DRAFT
ENVIRONMENTAL ASSESSMENT

Proposed Construction and Operation of an Outpatient Clinic in Tri-Cities, Washington

U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

October 2025

Executive Summary

This environmental assessment (EA) has been prepared to analyze the potential environmental impacts associated with the U.S. Department of Veterans Affairs' (VA's) Proposed Action to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in the Tri-Cities region of Washington. This EA has been prepared as required in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code § 4321 et seq.).

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 address space gaps and operational inefficiencies at existing clinics within the VA Walla Walla Health Care System. The Tri-Cities OPC would ensure continued access to high-quality, VA-operated outpatient care, supporting Veterans' current and future health care needs in the Tri-Cities region.

Proposed Action and Alternatives

VA's Proposed Action is to award a lease to a private entity that would construct an OPC for VA to lease and operate for up to 20 years in Tri-Cities, Washington. VA is evaluating two sites for the new OPC. VA received offers and conceptual OPC development plans from two private entities for one of the sites, and one offer and conceptual plan from a third private entity for the second site. VA would select only one site and the accompanying private entity for the new OPC. This EA identifies each potential site as Alternative 1 and 2. This EA examines Alternatives 1 and 2 and the No Action alternative in depth. These alternatives are described below.

Action Alternatives

Under Alternatives 1 or 2, the private entity would be responsible for designing and constructing the OPC in compliance with VA design requirements and applicable federal, state, and local regulations. The private entity would also be required to design and construct the OPC to meet Green Building Initiative Green Globes certification, which seeks to reduce energy and utility consumption through sustainable design practices (GBI, 2025). The OPC would be operated and staffed by the VA Walla Walla Health Care System, with approximately 231 new full-time staff anticipated.

Details unique to Alternatives 1A and 1B and Alternative 2 are described below:

- **Alternative 1 (1A and 1B) –** The site is located at 3811 Plaza Way, City of Kennewick, Benton County, WA, which is approximately 12 acres. VA received similar conceptual OPC designs from two different private entities for this site. This EA identifies these offers as Alternative 1A and 1B and provides separate analyses where the potential impacts between the alternatives are unique.
- **Alternative 2 –** This site is located at 8428 Bob Olson Parkway, City of Kennewick, Benton County, WA, which is approximately 19 acres. VA is considering one conceptual OPC design for this site.

Each of these alternatives involves the design, construction, and operation of a modern, state-of-the-art OPC facility with associated infrastructure, including access roads, parking, utilities, and landscaped areas. Once the new OPC is operational, VA would close the existing Richland VA community-based outpatient clinic (CBOC) at 825 Jadwin Avenue, Richland, WA, and relocate the services provided to the new OPC.

VA has not identified any other reasonable action alternatives that would meet the purpose and need for the Proposed Action.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. The existing Richland VA CBOC would remain the only primary care clinic operated by the VA Walla Walla Health Care System in the Tri-Cities area. It would continue to face space constraints and operational inefficiencies that could limit its ability to meet the growing health care needs of Veterans in the region. This alternative would not meet the growing health care demands of Veterans in the region and could result in longer waiting times and increased reliance on non-VA care providers. The No Action alternative would not meet the purpose and need for the Proposed Action. The proposed sites for the Tri-Cities OPC could remain vacant or be developed by others for different uses, in accordance with local zoning.

VA evaluated the No Action alternative in this EA. The No Action alternative provides a benchmark against which VA can compare the impacts of implementing the Proposed Action.

Summary of Potential Environmental Consequences

Table ES-1 lists the environmental resources evaluated and summarizes the potential impacts to each resource from each Alternative and the No Action alternative. As shown in Table ES-1, the Proposed Action under Alternatives 1A, 1B, or 2, would result in no significant adverse impact on any of the environmental resources analyzed in this EA.

Table ES - 1. Summary of Potential Environmental Consequences

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Aesthetics	**Construction:** Conversion of vacant land to active construction site for approximately 18-24 months. Temporary, negligible adverse impact during construction due to equipment and material presence. **Operation:** Permanent, minor beneficial impact by improving the site with a modern medical facility with professionally maintained landscaping.	**Construction:** Conversion of vacant land to active construction site for approximately 18-24 months. Temporary, negligible adverse impact during construction due to equipment and material presence. **Operation:** Permanent, minor beneficial impact by improving the site with a modern medical facility with professionally maintained landscaping.	No impact.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Air Quality	**Construction:** Emissions of fugitive dust from grading, criteria pollutants and greenhouse gas emissions from construction equipment and work vehicles. Temporary, negligible adverse impact on air quality. **Operation:** Emissions from heating, ventilation, and air conditioning (HVAC), emergency generator testing, staff and visitor vehicles, and operational energy use. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification. Permanent, negligible adverse impact on air quality.	**Construction:** Emissions of fugitive dust from grading, criteria pollutant and greenhouse gas emissions from construction equipment and work vehicles. Temporary, negligible adverse impact on air quality. **Operation:** Emissions from HVAC, emergency generator testing, staff and visitor vehicles, and operational energy use. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification. Permanent, negligible adverse impact on air quality.	No impact.
Wildlife and Habitat	**Construction:** No impact. There is no suitable habitat present for federal or state listed species at the site. **Operation:** No impact.	**Construction:** No impact. There is no suitable habitat present for federal or state listed species at the site. **Operation:** No impact.	No impact.
Floodplains, Wetlands, and Coastal Zone	**Floodplains:** The site is outside 100- and 500-year floodplains. No impact on floodplains. **Wetlands:** The site has no wetlands or waterbodies. No impact on wetlands or water resources. **Coastal Zone:** The site is not within the WA coastal zone. No impact on coastal zone resources.	**Floodplains:** The site is outside 100- and 500-year floodplains. No impact on floodplains. **Wetlands:** The site has a 0.012-acre wetland associated with a drainage ditch, but the wetland is not within the proposed OPC development area and would not be impacted during construction or operation of the OPC. No impact on wetlands or water resources. **Coastal Zone:** The site is not within the WA coastal zone. No impact on coastal zone resources.	No impact.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Cultural and Historic Resources	**Construction and Operation**: Based on an Initial Cultural Resource Impact Prediction (ICRIP) report and a Phase I archaeology investigation completed at each site, VA determined the Proposed Action/undertaking would result in a finding of no historic properties affected in accordance with 36 CFR 800.4(d)(1). On September 2, 2025, VA initiated Section 106 consultation as required under the NHPA with the Washington State Department of Archaeology and Historic Preservation (the State Historic Preservation Office [SHPO]), four federally recognized Indian tribes with ancestral ties to the area, and other consulting parties (see Section 3.6 in the EA for the detailed list). The WA SHPO issued a Section 106 letter concurring with the finding of no historic properties affected. No other parties provided comments.	**Construction and Operation**: Based on an ICRIP report and a Phase I archaeology investigation completed at each site, VA determined the Proposed Action/undertaking would result in a finding of no historic properties affected in accordance with 36 CFR 800.4(d)(1). On September 2, 2025, VA initiated Section 106 consultation as required under the NHPA with the WA SHPO, four federally recognized Indian tribes with ancestral ties to the area, and other consulting parties (see Section 3.6 in the EA for the detailed list). The WA SHPO issued a Section 106 letter concurring with the finding of no historic properties affected. No other parties provided comments.	No impact.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Geology and Soils	**Geology:** Construction and operation would have no impact on geological resources. The private entity would design and construct the OPC to meet or exceed federal, state, and local seismic codes. OPC construction is not anticipated to encounter bedrock. **Soil:** Prior to construction, the private entity would be required to apply for and obtain coverage under the Washington State Department of Ecology (WADOE) Construction Stormwater General Permit to manage soil erosion during construction and implement and maintain BMPs specified in the *2024 Stormwater Management Manual for Eastern Washington.* The private entity would also implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impact of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality. Releases of regulated quantities of petroleum-based fluids would be reported to VA and WADOE and cleaned up per state regulatory requirements. Construction would have a temporary, minor adverse impact on soil quality. **Operation:** No mechanisms to further impact soil or cause erosion during operation of the OPC.	**Geology:** Construction and operation would have no impact on geological resources. The private entity would design and construct the OPC to meet or exceed federal, state, and local seismic codes. OPC construction is not anticipated to encounter bedrock. **Soil:** Prior to construction, the private entity would be required to apply for and obtain coverage under the WADOE Construction Stormwater General Permit to manage soil erosion during construction and implement and maintain BMPs specified in the *2024 Stormwater Management Manual for Eastern Washington.* The private entity would also implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impact of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality. Releases of regulated quantities of petroleum-based fluids would be reported to VA and WADOE and cleaned up per state regulatory requirements. Construction would have a temporary, minor adverse impact on soil quality. **Operation:** No mechanisms to further impact soil or cause erosion during operation of the OPC.	No impact.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Hydrology and Water Quality	**Construction:** To minimize potential impacts on hydrology and water quality during construction, the private entity would obtain the WADOE Construction Stormwater General Permit and implement and maintain permit-required BMPs, such as bioretention areas, vegetated swales, and retention basins. Additionally, the private entity would establish a Spill Prevention, Control, and Countermeasure plan and train workers on how to respond to accidental releases of petroleum-based fluids to prevent impacts to groundwater during the construction phase. Permanent, negligible adverse impact on hydrology and water quality. **Operation**: On-site stormwater management systems installed during construction would be maintained as designed to reduce off-site migration of stormwater runoff. Permanent, negligible adverse impact on hydrology and water quality.	**Construction**: To minimize potential impacts on hydrology and water quality during construction, the private entity would obtain the WADOE Construction Stormwater General Permit and implement and maintain permit-required BMPs, such as bioretention areas, vegetated swales, and retention basins. Additionally, the private entity would establish a Spill Prevention, Control, and Countermeasure plan and train workers on how to respond to accidental releases of petroleum-based fluids to prevent impacts to groundwater during the construction phase. Permanent, negligible adverse impact on hydrology and water quality. **Operation**: On-site stormwater management systems installed during construction would be maintained as designed to reduce off-site migration of stormwater runoff. Permanent, negligible adverse impact on hydrology and water quality.	No impact.
Land Use	**Construction and Operation:** Use of the site for an OPC would be consistent with the Kennewick zoning designations for the parcel and consistent with land uses described in the City of Kennewick Comprehensive Plan. Additionally, the Proposed Action would not restrict land uses or require changes to zoning for properties surrounding either site. Construction and operation would have no impact on land use.	**Construction and Operation:** Use of the site for an OPC would be consistent with the Kennewick zoning designations for the parcel and consistent with land uses described in the City of Kennewick Comprehensive Plan. Additionally, the Proposed Action would not restrict land uses or require changes to zoning for properties surrounding either site. Construction and operation would have no impact on land use.	No impact.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Noise and Vibration	**Construction:** The private entity would comply with Kennewick Municipal Code 9.52.060 by operating construction equipment within the work site and not earlier than 6:00 a.m. or later than 8 p.m. Private entity would also implement the U.S. Occupational Safety and Health Administration (OSHA) worker hearing conservation program. Construction would have a temporary, negligible adverse impact on noise-sensitive receptors adjacent to the site, and temporary, negligible adverse impact on construction personnel working at the site. Construction methods would have no impact on vibration-sensitive receptors. **Operation:** Noises generated from HVAC systems, monthly emergency generator testing, and vehicles traveling to and from the site during operation, would have a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community. Operation would have no impact on vibration-sensitive receptors.	**Construction:** The private entity would comply with Kennewick Municipal Code 9.52.060 by operating construction equipment within the work site and not earlier than 6:00 a.m. or later than 8 p.m. Private entity would also implement the OSHA worker hearing conservation program. Construction would have a temporary, negligible adverse impact on noise-sensitive receptors adjacent to the site, and temporary, negligible adverse impact on construction personnel working at the site. Construction methods would have no impact on vibration-sensitive receptors. **Operation:** Noises generated from HVAC systems, monthly emergency generator testing, and vehicles traveling to and from the site during operation, would have a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community. Operation would have no impact on vibration-sensitive receptors.	No impact.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Solid Waste and Hazardous Materials	**Construction**: The Phase I Environmental Site Assessment (ESA) did not identify any recognized environmental conditions at the site. Construction debris recycled or reused to extent practicable, otherwise transported to an appropriate off-site landfill. Temporary, minor adverse impact from construction waste generation. **Operation:** Solid wastes generated during operation would be similar to other existing VA OPCs. Wastes would be transported and disposed of at a USEPA-licensed disposal facility. Permanent, negligible adverse impact due to minimal volumes of wastes generated and disposed.	**Construction**: The Phase I ESA did not identify any recognized environmental conditions at the site. Construction debris recycled or reused to extent practicable, otherwise transported to an appropriate off-site landfill. Temporary, minor adverse impact from construction waste generation. **Operation:** Solid wastes generated during operation would be similar to other existing VA OPCs. Wastes would be transported and disposed of at a USEPA-licensed disposal facility. Permanent, negligible adverse impact due to minimal volumes of wastes generated and disposed.	No impact.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Traffic, Transportation, and Parking	**Construction:** The private entity would be responsible for obtaining the City of Kennewick Public Works permits, including the Road Approach and Right-of-way Encroachment permits, required to construct driveways, curb cuts, or other modifications to roadways or rights-of-way. Construction material deliveries, facility entrance construction, workers commuting to and from the site, and removal of equipment once construction is complete would have a temporary, negligible impact on traffic. **Operation:** During operation, vehicle traffic would increase, but the level of service is projected to remain at a Level of Service (LOS) of A or B for the next 20 years, resulting in permanent, negligible impact on traffic conditions.	**Construction:** The private entity would be responsible for obtaining the City of Kennewick Public Works permits, including the Road Approach and Right-of-way Encroachment permits, required to construct driveways, curb cuts, or other modifications to roadways or rights-of-way. Construction material deliveries, facility entrance construction, workers commuting to and from the site, and removal of equipment once construction is complete would have a temporary, negligible impact on traffic. **Operation**: During operation, vehicle traffic would increase, but the level of service is projected to remain at an LOS of A for the next 20 years, resulting in no impact on traffic conditions.	No impact.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Utilities	**Construction:** Utility services are available from local providers for potable water, sewerage, electricity, and telecommunication services. Private entity required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. Private entity to obtain permits required to connect to and utilize utility services and to construct utility corridors in rights-of-way. Temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use would be similar to other OPCs. Private entity would be required to design the OPC to achieve Green Globes certification. Permanent, negligible adverse impact on utilities from standard consumption rates.	**Construction:** Utility services are available from local providers for potable water, sewerage, electricity, and telecommunication services. Private entity required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. Private entity to obtain permits required to connect to and utilize utility services and to construct utility corridors in rights-of-way. Temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use would be similar to other OPCs. Private entity would be required to design the OPC to achieve Green Globes certification. Permanent, negligible adverse impact on utilities from standard consumption rates.	No impact.
Community Services	**Construction and Operation:** Permanent, beneficial impact by expanding health care access for Veterans. OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Walla Walla Health Care System. No impact on other local community services.	**Construction and Operation:** Permanent, beneficial impact by expanding health care access for Veterans. OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Walla Walla Health Care System. No impact on other local community services.	No Action Alternative would have a permanent, adverse impact on health care services that VA is able to provide to Veterans in the Tri-Cities region.

Resource	Proposed Action – Alternatives 1A and 1B	Proposed Action – Alternative 2	No Action Alternative
Socio-economics	**Construction:** Potential spending on construction supplies at local vendors, employment of construction workers, and incidental spending in the local community. Temporary, negligible beneficial impact on socioeconomics. **Operation**: Increase in staff and incidental spending by staff and visitors. Permanent, negligible beneficial impact on socioeconomics.	**Construction:** Potential spending on construction supplies at local vendors, employment of construction workers, and incidental spending in the local community. Temporary, negligible beneficial impact on socioeconomics. **Operation**: Increase in staff and incidental spending by staff and visitors. Permanent, negligible beneficial impact on socioeconomics. No impact at regional or state level.	No impact.
Potential for Generating Substantial Controversy	**Construction:** No controversy anticipated during the construction. **Operation:** Community support for improving Veterans' medical care is anticipated.	**Construction:** No controversy anticipated during the construction. **Operation:** Community support for improving Veterans' medical care is anticipated.	Controversy anticipated as existing VA clinics would remain over-burdened.

Agency Coordination and Public Involvement

VA electronically sent a scoping notice to selected federal, state, and local agencies; Indian tribes; and elected officials to solicit input regarding the scope of the EA and environmental issues for in-depth analysis. The scoping notice was also published on VA's website at https://www.cfm.va.gov/environmental/ and in the *Tri-City Herald* on December 22 and 25, 2024, to announce VA's intent to prepare an EA and request scoping input. Copies of correspondence and newspaper notices are provided in Appendix E.

This Draft EA is published for a 30-day public review and comment period. VA electronically sent a notice of availability (NOA) to federal, state, and local agencies, tribes, and community stakeholders, to solicit input on the Draft EA. The NOA for the Draft EA was also published in the *Tri-City Herald.* The NOA explained how to obtain the Draft EA electronically from the VA website at https://www.cfm.va.gov/environmental/ and in print at the Mid-Columbia Libraries' Kennewick Branch, 1620 S. Union Street, Kennewick, WA 99338. The NOA explained that comments on the Draft EA are to be sent to vacoenvironment@va.gov. VA will summarize and address substantive comments in the Final EA.

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ACRONYMS AND ABBREVIATIONS

Acronym	Definition
ACAM	Air Conformity Applicability Model
APE	Area of Potential Effects
BCC	Birds of Conservation Concern
BGEPA	Bald and Golden Eagle Protection Act
BMP	Best Management Practice
CARB	California Air Resources Board
CBOC	Community Based Outpatient Clinic
CFR	Code of Federal Regulations
CLV	Critical Lane Volume
CO	Carbon Monoxide
CREC	Controlled Recognized Environmental Conditions
CZMA	Coastal Zone Management Act
dBA	A-weighted decibels
EA	Environmental Assessment
ESA	Endangered Species Act
FEMA	U.S. Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
GCR	General Conformity Review
GHG	Greenhouse Gas
HREC	Historical Recognized Environmental Conditions
HUC	Hydrologic Unit Code
HVAC	heating, ventilation, and air conditioning
ICRIP	Initial Cultural Resource Impact Prediction
IPaC	Information for Planning and Consultation
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHD	National Hydrography Dataset
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Services
NOA	Notice of Availability
NRCS	National Resource Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
OPC	Outpatient Clinic
OSHA	Occupational Safety and Health Administration
PM	Particulate Matter
PSD	Prevention of Significant Deterioration

Acronym	Definition
REC	Recognized Environmental Condition
SHPO	State Historic Preservation Office
TIA	Traffic Impact Analysis
TTG	The Traffic Group
USACE	U.S. Army Corps of Engineers
USAF	U.S. Air Force
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VA	U.S. Department of Veterans Affairs
VAMC	VA Medical Center
VdB	Vibration decibels
VOC	Volatile Organic Compounds
WA	Washington
WADOE	Washington State Department of Ecology
WADFW	Washington Department of Fish and Wildlife
WANHP	Washington Natural Heritage Program

1.0 INTRODUCTION

The U.S. Department of Veterans Affairs (VA) prepared this environmental assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code § 4321 et seq.). NEPA requires federal agencies to consider the environmental effects of their proposed actions.

This EA supports the decision-making process for VA's Proposed Action to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Tri-Cities, Washington (WA). VA is considering locating the new OPC at one of two alternative site locations:

- **Alternative 1:** 3811 Plaza Way, City of Kennewick, Benton County, WA
- **Alternative 2:** 8428 Bob Olson Parkway, City of Kennewick, Benton County, WA

Figure 2 shows the relative location of the Alternative 1 and 2 sites in Kennewick, WA. Figures 3 and 4 show a detailed location map of the Alternative 1 and 2 sites, respectively.

The VA received proposals from two private entities, each offering separate conceptual OPC development plans for the Alternative 1 site. These plans are similar but have minor differences; this EA refers to them as Alternative 1A and Alternative 1B for clarity. Additionally, a third private entity provided a conceptual OPC development plan for the Alternative 2 site. VA would select only one Alternative and its associated private entity for the new OPC.

This EA presents an analysis of the potential impacts on the human environment from construction and operation of the Proposed Action, as well as the impacts of a No Action alternative. As required under NEPA, this EA considers input from the public, agencies, and Tribes into the federal decision-making process; provides the federal decision-maker with an understanding of potential environmental effects of the decision before making it; identifies measures to reduce potential environmental effects; and documents the NEPA process. At the conclusion of the NEPA process, VA will determine whether this EA supports a Finding of No Significant Impact or if an Environmental Impact Statement is required.

Figure 1. Tri-Cities OPC Proposed Action Alternative Site Locations

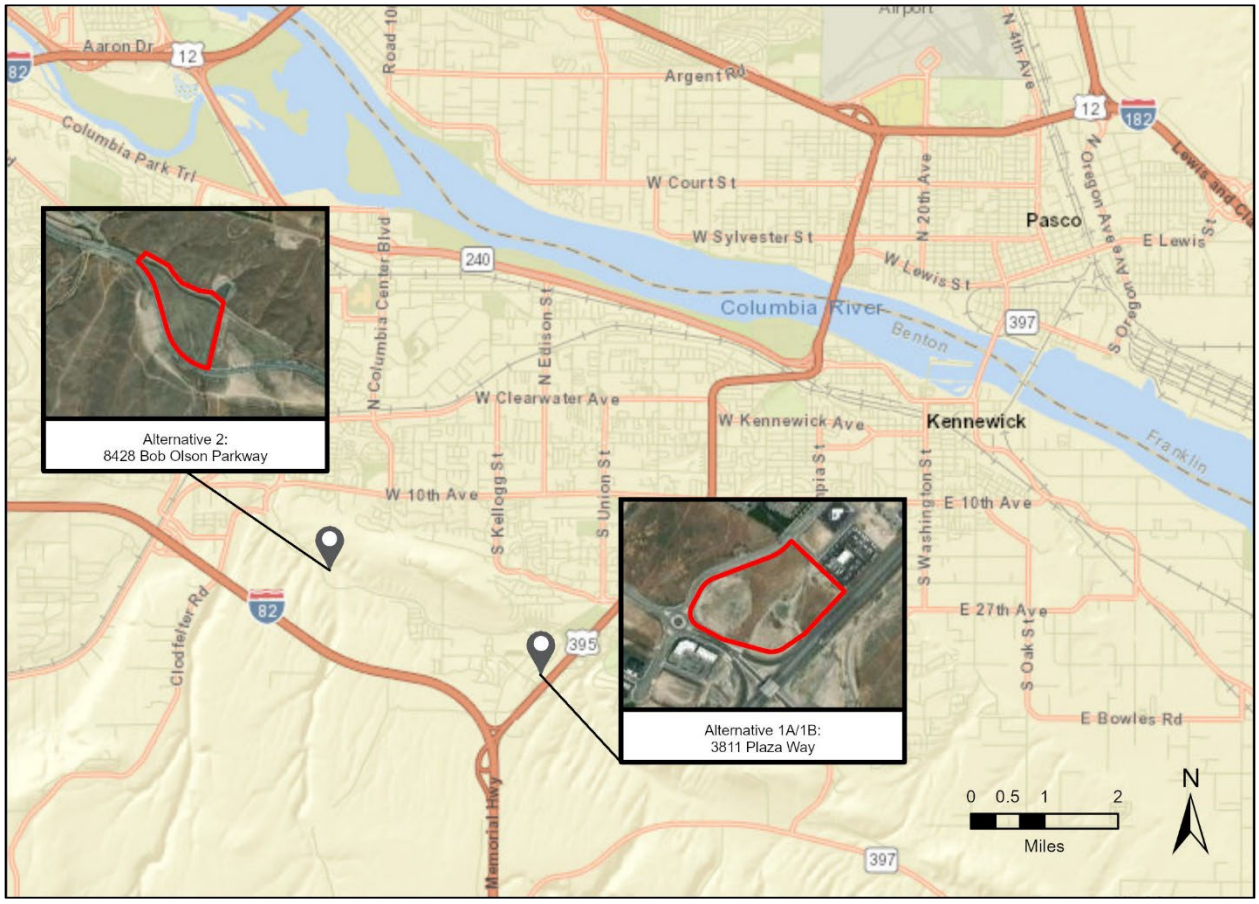


Figure 2. Alternative 1A/1B – 3811 Plaza Way Site Location Map

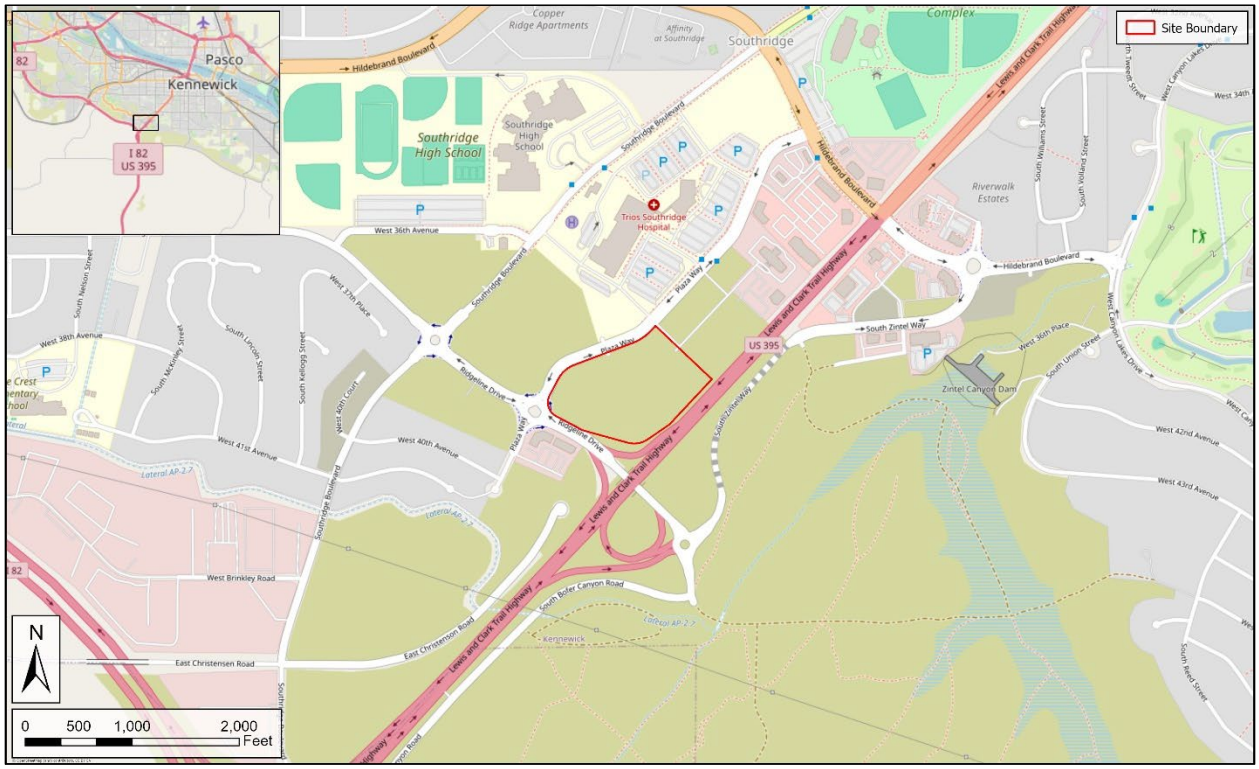


Figure 3. Alternative 2 – 8428 Bob Olson Parkway Site Location Map

1.1 Background

The VA Walla Walla Health Care System consists of the main Jonathan M. Wainwright Memorial VA Medical Center (VAMC) in Walla Walla, WA, and five (5) outpatient clinics throughout the state.

The locations of the existing VA clinics, along with their distances from Tri-Cities, are present in Table 1Table 1.

1.2 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 address space gaps and operational inefficiencies at existing clinics within the VA Walla Walla Health Care System. 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.

Table 1. Existing Tri-Cities VA Clinics and Walla Walla VAMC

Name	Address	Distance from Tri-Cities, WA
Jonathan M. Wainwright Memorial VAMC	77 Wainwright Drive Walla Walla, WA 99362-3975	52 miles SE
La Grande VA Clinic	202 12th Street La Grande, OR 97850-2879	121 miles SE
Lewiston VA Clinic	1630 23rd Avenue, Building 2 Lewiston, ID 83501-6350	135 miles E
Morrow County VA Clinic	2 Marine Drive, Suite 103 Boardman, OR 97818	56 miles SW
Richland VA Clinic	825 Jadwin Avenue, Suite 250, 2nd Floor Richland, WA 99352-3589	9 miles NW
Yakima Valley VA Clinic	1211 Ahtanum Ridge Drive Union Gap, WA 98903	79 miles NW

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

VA reviewed alternative approaches for meeting the purpose of and need for the Proposed Action. This section describes the Proposed Action and the No Action alternative in detail.

2.1 Proposed Action

VA's Proposed Action is to award a lease to a private entity that would construct an OPC for VA to lease and operate in Tri-Cities, WA. The private entity would construct the OPC on a "build-to-suit" basis for VA to lease for up to 20 years.

Under Alternative 1 or Alternative 2, 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 meet 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 grading, excavation for the building foundation and utilities, installation of new utility connections to public utility services for potable water, sanitary sewer, stormwater, electricity, and telecommunications. It will also include the construction of the OPC, as well as paving for roads, parking, and new entrances. The OPC is anticipated to be no more than two stories. On-site ground-level parking would be provided for approximately 700-750 vehicles. Construction activities would involve 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.

Following construction, the VA Walla Walla Health Care System would administer and staff the OPC, with approximately 231 full-time employees expected to work at the new facility. The new Tri-Cities OPC would provide primary care services and Compensation and Pension examinations for Veterans, multi-specialty services, including pharmacy, prosthetics, radiology, pathology & laboratory medicine, as well as Home-Based Primary Care, Patient Aligned Care Team, Physical Medicine/Rehabilitation, clinic management, education, engineering, logistics, police, and canteen services. Once the new OPC is operational, services currently provided at the Richland VA community-based outpatient clinic (CBOC) at 825 Jadwin Avenue, Richland, WA, would be relocated to the new OPC, along with the supporting staff. The new OPC would integrate with the surrounding environment, minimizing the environmental impact while ensuring convenient access for Veterans and staff. The OPC would comply with all applicable federal, state, and local regulations to ensure safety, sustainability, and high-quality health care services for Veterans. The OPC would provide services from approximately 7:00 a.m. to 5:00 p.m., Monday through Friday, although the operating hours are subject to change.

2.1.1 Action Alternatives

VA is evaluating two sites (Alternatives 1 and 2) for the new OPC. At the Alternative 1 site, VA received offers and conceptual OPC development plans from two private entities; these two offers are similar and are identified as Alternatives 1A and 1B. At the Alternative 2 site, VA received one offer and conceptual plan from a third private entity. Under the Proposed Action, VA would select only one of the Action Alternatives for the new OPC. A discussion of the Action Alternatives is provided in the following subsections. The summary of the major OPC design elements for each for the Action Alternatives is provided in Table 2. These values are approximate and may vary based on final site development plans.

2.1.1.1 Alternative 1 – 3811 Plaza Way, Kennewick, Benton County, WA

The Alternative 1 site is approximately 12 acres. The site is undeveloped and is surrounded by dense mixed commercial and residential developments. The site is northwest of US-395, east of Ridgeline Drive, and south of Plaza Way. The site is comprised of a single parcel identified by the Benton County Tax Assessor as Parcel ID: 116893013055001.

As previously discussed, VA received conceptual OPC development plans for the Alternative 1 site from two different private entities. The two conceptual OPC design plans are identified as Alternative 1A and 1B. The primary difference between Alternatives 1A and 1B is the position of the OPC within the site and proposed number of access roads to the OPC. The conceptual OPC development plans for Alternative 1A and Alternative 1B are shown in Figure 4 and Figure 5, respectively.

Figure 4. Alternative 1A – Tri-Cities Conceptual OPC Design

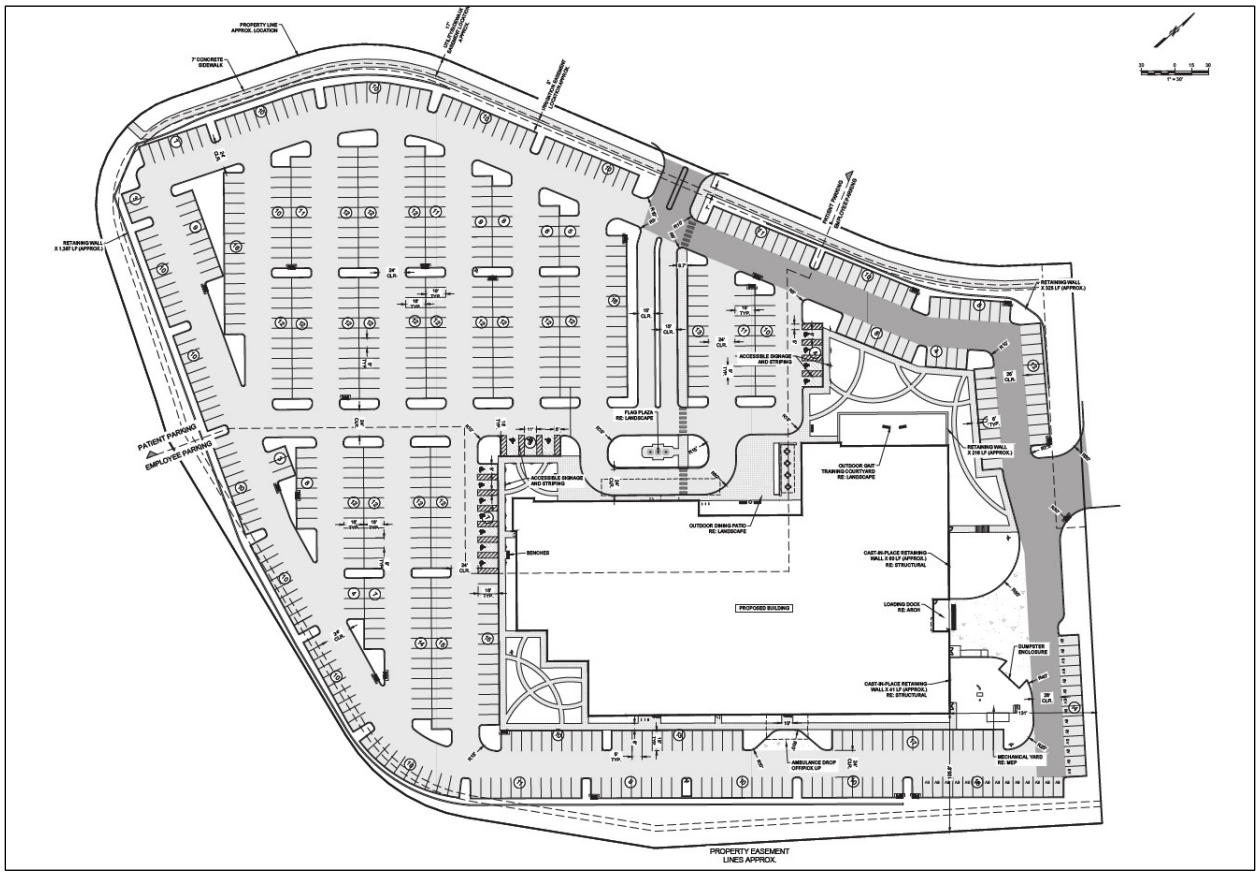
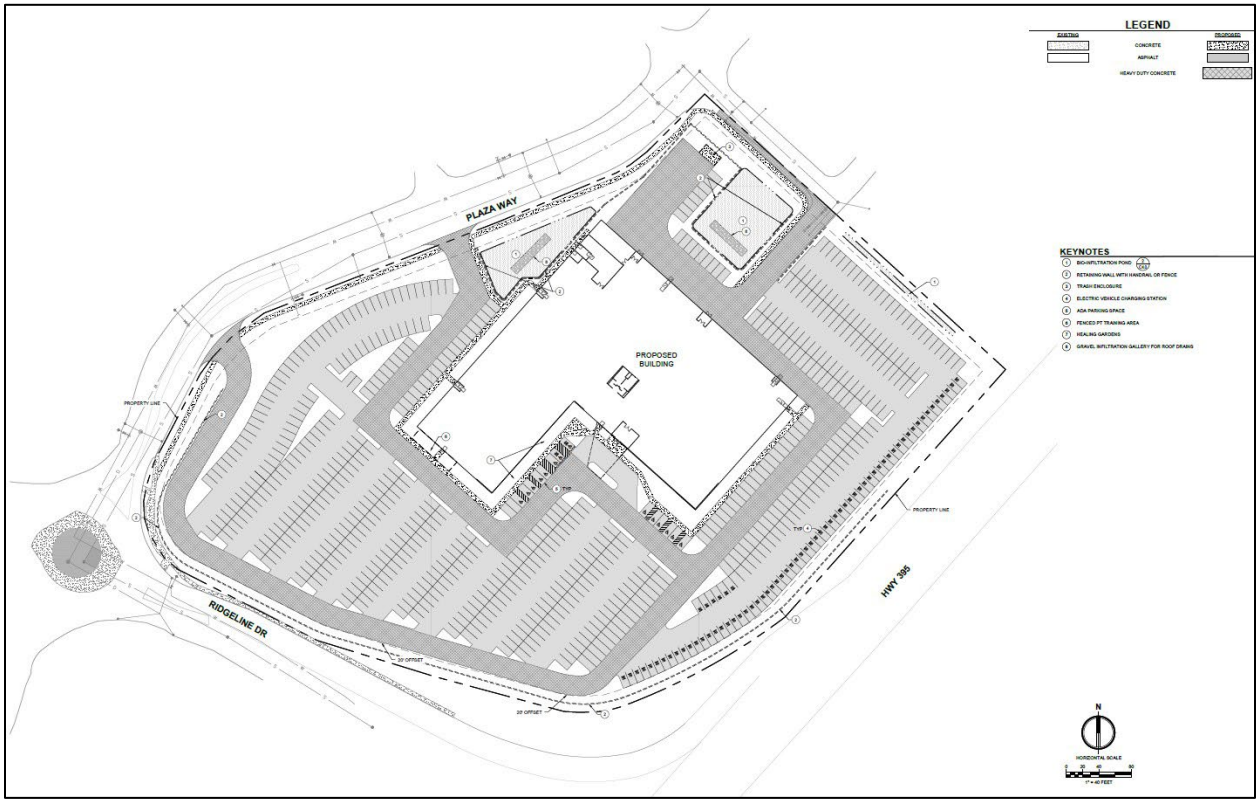


Figure 5. Alternative 1B – Tri-Cities OPC Conceptual Design



2.1.1.2 Alternative 2 – 8428 Bob Olson Parkway, Kennewick, Benton County, WA

The Alternative 2 site is approximately 19 acres. The site is currently undeveloped but formerly had public roadways crossing it from east to west and to the south. In 2016 the entire site was regraded during construction of Bob Olson Parkway, which is located along the southern boundary of the site. The adjacent properties around the site are undeveloped, but expansive residential developments are located within 0.3 miles to the north, east, and west of the site. Route 82 is located approximately 0.5 miles south of the site. The site is comprised of a single parcel identified by the Benton County Tax Assessor as Parcel ID: 107894000001010.

The conceptual OPC development plan for Alternative 2 is shown in Figure 6.

Figure 6. Alternative 2 – Tri-Cities Conceptual OPC Design

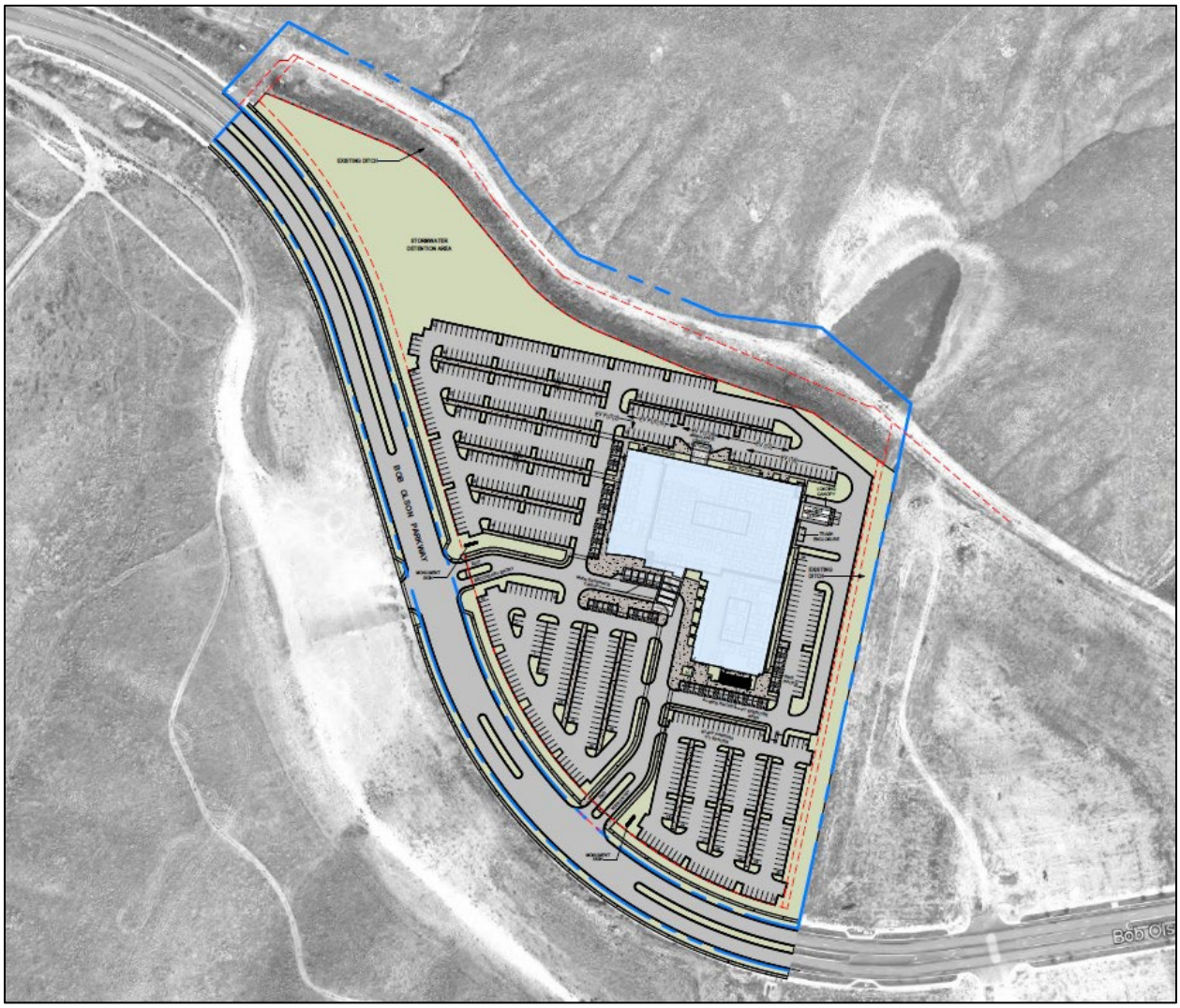


Table 2. Conceptual Design Elements for Alternatives 1A, 1B, and 2

Action Alternative	Total site area (approx. acres)	Building footprint (approx. sf)	Proposed roadway entrances	Parking spaces (approx.)	Proposed stormwater management	New impervious surface area (approx. acres)
Alternative 1A – 3811 Plaza Way	12	80,000	2	705	Underground detention ponds	8.2
Alternative 1B – 3811 Plaza Way	12	80,000	3	700	Infiltration gallery	9.2
Alternative 2 – 8428 Bob Olson Parkway	19	78,102	2	758	Detention basin	11.7

2.2 No Action Alternative

Under the No Action Alternative, VA would not award a lease to a private entity for a new Tri-Cities OPC and the Proposed Action would not be implemented. The existing Richland VA CBOC would remain the only VA-operated primary care clinic in the Tri-Cities area, continuing to face space limitations and operational inefficiencies that may hinder its ability to meet the growing health care needs of Veterans. The No Action alternative would fail to address increasing demand for VA-provided health care, potentially leading Veterans to experience longer wait times and greater reliance on non-VA health care providers.

If the No Action alternative is selected, the following conditions are expected:

- Limited availability of outpatient care services, resulting in increased wait times for Veterans.
- Ongoing reliance on outdated, space-constrained CBOC infrastructure, reducing operational efficiency.
- Greater need for Veterans to seek private-sector outpatient care, leading to higher out-of-pocket costs and dependence on third-party providers.
- Delayed facility modernization, postponing the adoption of energy-efficient and patient-centered health care design.

The No Action alternative does not meet the purpose of and need for the Proposed Action. However, VA evaluated the No Action alternative in this EA. The No Action alternative also provides a benchmark against which VA can compare the impacts of the Proposed Action.

2.2.1 Summary of Alternatives

VA has identified three Action Alternatives (1A, 1B, 2) and the No Action alternative. A single Action Alternative—either Alternative 1A, 1B, or 2—would be selected by VA for implementation. The final decision will be based on a comprehensive evaluation of environmental, technical, and operational factors.

The analysis of environmental impacts in this EA focuses on these alternatives to determine the most suitable development plan for the Proposed Action. No other Action Alternatives were identified by VA that meet the purpose and need for the Proposed Action.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section describes the existing conditions at the Alternative 1 and 2 sites and presents an analysis of the potential impacts of implementing the Proposed Action or the No Action Alternative on the human environment. The affected environment includes the site, and, depending on the resource, a region surrounding the site. When describing the impacts associated with the Proposed Action, the impacts apply to Alternatives 1A, 1B, and 2; in cases where impacts are unique to an Action Alternative, a separate subheading for that Alternative is provided.

To ensure consistency in the evaluation of potential environmental effects, this section defines key impact terminology used throughout the EA. These definitions clarify the nature, scale, and duration of impacts, as well as temporary and permanent changes. Impact intensity is categorized to reflect the degree of change a resource may experience due to the Proposed Action. The terms "effects" and "impacts" have the same meaning in this EA. The following definitions provide a standardized framework for assessing environmental consequences.

- **Permanent Impacts:** Effects that are caused by the action and result in irreversible changes to the environment, such as the permanent loss of wetlands due to development.
- **Temporary Impacts:** Effects that are caused by the action and are reversible and last for a limited period, such as noise disturbances during construction.
- **Negligible Impacts:** Effects that are so minor that they do not noticeably alter any important attribute of the resource.
- **Minor Impacts:** Effects that are detectable but do not significantly alter the resource's attributes.
- **Moderate Impacts:** Effects that are readily apparent and alter the resource noticeably, but do not threaten its integrity.
- **Adverse Impacts:** Effects that are detrimental or harmful to the environment, such as pollution leading to the decline of wildlife populations.
- **Beneficial Impacts:** Effects that are advantageous or positive, like restoration projects improving habitat quality.

For the purposes of this EA, a significant impact is an effect on the environment that is substantial in magnitude or duration, considering factors such as the extent of environmental change, potential harm to public health or natural resources, and whether the impact is irreversible. The determination of significance considers both the intensity of the impact and the broader environmental and societal context in which it occurs. If the analysis in this EA identifies a significant impact, a more detailed Environmental Impact Statement may be required to further evaluate those impacts and identify mitigation measures.

3.1 Environmental Resources Included in this EA for Detailed Analysis

Based on the results of VA's internal and external scoping, the resources analyzed in this EA include: aesthetics; air quality; wildlife and habitat; floodplains, wetlands and coastal zone; cultural resources and historic properties; geology and soils; hydrology and water quality; land use; noise and vibration; solid waste and hazardous materials; traffic, transportation, and parking; utilities; community services; and socioeconomics. Each section starts with an italicized definition of the environmental resource.

3.2 Aesthetics

Aesthetics refers to the visual interaction between an individual and the environment.

3.2.1 Affected Environment

3.2.1.1 Proposed Action – Alternatives 1A and 1B

The Alternative 1 site is located at 3811 Plaza Way, City of Kennewick, Benton County, WA. In 2022 and 2023, most of the site was cleared and graded. The entire site is currently vacant and undeveloped, has no tree cover, and no structures.

The site is located in a suburban setting and is surrounded by commercial properties and residential neighborhoods including Creekstone and South Highlands. The site is east of Plaza Way, south of Cleveland Street north of Ridgeline Drive, and adjacent to the north of US-395 (Thomas S. "Tom" Foley Memorial Highway).

Trios Ridge Southridge Hospital is located immediately north of the site, on the western side of Plaza Way; the hospital includes a large parking lot and helipad. Southridge High School campus is located approximately 900 feet north of the site; the campus includes the school, two parking lots, and athletic fields.

The Alternative 1 site is visible to passersby on Plaza Way, Ridgeline Drive, Cleveland Street, and US-395.

The site has no prominent scenic vistas, state scenic highways, or views of any other notable visual resources in its vicinity.

3.2.1.2 Proposed Action – Alternative 2

The Alternative 2 site is located at 8428 Bob Olson Parkway, Kennewick, Benton County, VA. The site is currently undeveloped and unimproved, but formerly had public roadways crossing it from east to west and to the south. In 2016, the entire site was regraded during construction of Bob Olson Parkway, which is located along the southern boundary of the site. The site is entirely cleared, has open grassland areas, no tree cover, and no structures. There is a linear ditch feature along the eastern and northern boundaries of the site. A pair of culverts direct stormwater flow north under the Bob Olson Parkway at the southeast portion of the site, and a culvert inlet is also present at the northeast end. Additionally, a culvert outlet is present at the northern boundary of the site; the culvert may be associated with stormwater infrastructure present to the north of the site.

The site is located in a rural area surrounded by vacant land. However, the site is approximately 0.3 miles southwest of large residential developments to the north, east, and west. Route 82 is located approximately 0.5 miles south of the site.

The Alternative 2 site is visible to passersby on Bob Olson Parkway, which is lined with planted trees and includes a pedestrian sidewalk on either side of this four-lane divided road.

The site has no prominent scenic vistas, state scenic highways, or views of any other notable visual resources in the vicinity of the site.

3.2.2 Environmental Consequences

3.2.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.2.2.1.1 Construction

Under Alternative 1 or 2, construction would involve the presence of construction equipment, vehicles, materials, and related activity that would temporarily affect the visual aesthetics of the site. Construction would require grading the site, compacting exposed soil, excavation for utilities, paving for new entrances and parking areas, and vertical construction of the OPC. The extent of these impacts would be similar within each site. These activities would convert the current visual aesthetic of each site from vacant land to an active construction area.

The construction area would be visible to passersby on the roads bordering each site. Construction activities at the Alternative 1 site may also be visible from nearby Trios Southridge Hospital. In contrast, the Alternative 2 site is only visible to passersby traveling on Bob Olson Parkway.

Under Alternatives 1 or 2, there would be no impact on scenic resources as there are no prominent scenic vistas, state scenic highways, or any other notable visual resources in the vicinity of either site.

Therefore, under Alternatives 1 or 2, construction of the Proposed Action is anticipated to have a temporary, negligible adverse impact on aesthetics in the area surrounding the site. This impact would end once the construction phase is complete.

3.2.2.1.2 Operation

Under Alternatives 1 or 2, the Tri-Cities OPC would be visible to passersby on the adjacent roadways and from nearby facilities in the case of Alternative 1. The OPC and new landscaping installed during construction would be professionally maintained for the duration of VA's lease to preserve compatibility with adjacent properties and minimize long-term aesthetic disruptions. As a result, the Proposed Action would convert either site from vacant, disturbed land, into a modern VA OPC campus with professionally maintained landscaping.

Therefore, under Alternatives 1 or 2, the operation of the Proposed Action would have a permanent, minor beneficial impact on aesthetics.

3.2.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at the sites, though each site could be developed by others. Therefore, the No Action alternative would result in no impact on aesthetics at either site.

3.3 Air Quality

Air quality refers to the concentration of air contaminants in a specific location. Air quality is determined by the type and amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and prevailing meteorological conditions.

3.3.1 Affected Environment

The U.S. Environmental Protection Agency (USEPA) and the Washington State Department of Ecology (WADOE) regulate air quality in the state of Washington, while the Benton Clean Air Agency is responsible for enforcing Federal and State Clean Air Acts in Benton County. These agencies develop rules, regulations, and policies for managing air quality in accordance with applicable legislation. USEPA regulations may not

be superseded; however, state and local regulations may be more stringent. The Alternative 1 and 2 sites are in the USEPA-designated Eastern Washington-Northern Idaho Interstate Air Quality Control Region.

The affected environments for Alternatives 1 and 2 are similar, as both sites are located in suburban areas with vehicle traffic from major roadways and nearby residential and commercial zones. In Benton County, three facilities are subject to Air Operating Permits issued by WADOE; these include Nutrien US, Williams Northwest Pipeline GP, and Horn Rapids Landfill (BCAA, 2025). None of these facilities are within one mile of the Action Alternative sites.

3.3.1.1 Federal Air Quality Standards

The Clean Air Act of 1970 (42 U.S. Code 7401 et seq.) authorizes the USEPA to establish National Ambient Air Quality Standards (NAAQS) (40 Code of Federal Regulations [CFR] Part 50) that set acceptable upper concentration limits for the following criteria pollutants: particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers ($PM_{2.5}$), sulfur oxides (SO_2), carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), and lead (Pb).

The USEPA General Conformity Rule (GCR) requires federal agencies to demonstrate that actions that they undertake, approve, permit, or support in nonattainment and maintenance areas will conform to the appropriate USEPA-approved State Implementation Plan (40 CFR Parts 51 and 93). A conformity applicability analysis is the first step to assess whether a federal action must be supported by a full conformity determination. If the results of the applicability analysis indicate that the total emissions of a proposed project would not exceed GCR *de minimis* emissions thresholds, then the conformity evaluation process is complete. If total emissions would equal or exceed federal GCR *de minimis* thresholds, then a full conformity determination is required to ensure that federal actions do not cause or contribute to violations of the NAAQS or affect NAAQS attainment.

Areas that violate NAAQS are designated as nonattainment areas; areas with levels below NAAQS are designated as attainment areas. An area may also be classified as a maintenance area if it was classified as nonattainment but has since reached attainment by implementing of a maintenance plan. Benton County is designated by USEPA as in attainment for all criteria pollutants (USEPA, 2025). Because Benton County is designated as in attainment for all criteria pollutants, the GCR does not apply. Therefore, emissions from temporary mobile construction activities are evaluated using the Prevention of Significant Deterioration (PSD) major source thresholds (250 tons per year for criteria pollutants; 25 tons per year for lead) as conservative insignificance indicators. These insignificance indicators provide a useful benchmark for determining whether emissions from the Proposed Action would be expected to cause meaningful air quality impacts in an attainment area.

3.3.1.2 Greenhouse Gases

Greenhouse gases (GHGs) include carbon dioxide (CO_2), methane, nitrous oxide, sulfur hexafluoride, hydrofluorocarbons, and perfluorocarbons. The global warming potential of these GHGs is measured relative to CO_2, the most abundant GHG, and GHG emissions are typically expressed in terms of pounds or tons of "CO_2 equivalents" (referred to as CO_2e).

3.3.1.3 Sensitive receptors

Sensitive receptors for air quality impacts are those that are the most sensitive to pollution impacts, such as young children, older adults, or people with respiratory and other related illnesses. Sensitive receptors include schools, daycare facilities, nursing homes, and religious institutions. The following sections describe sensitive receptors unique to each Action Alternative site.

3.3.1.3.1 Proposed Action - Alternatives 1A and 1B

Sensitive receptors within an approximately one-mile radius of the Alternative 1 site include:

- **North:** Residential developments; Southridge High School; Chinook Middle School; Lincoln Elementary School; Sacajawea Elementary School; Church of the Nazarene.
- **South:** No sensitive receptors.
- **East:** Residential developments.
- **West:** Residential developments; Sage Crest Elementary School; Southridge Church.

There are no daycare centers or nursing homes within a one-mile radius of the Alternative 1 site.

3.3.1.3.2 Proposed Action - Alternative 2

Sensitive receptors within an approximately one-mile radius of the Alternative 2 site include:

- **North:** Residential developments.
- **South:** No sensitive receptors.
- **East:** Residential developments; Ridge View Elementary School.
- **West:** Residential developments; Desert Hills Middle School; Kennewick Seventh-day Adventus Church.

There are no daycare centers or nursing homes within a one-mile radius of the Alternative 2 site.

3.3.2 Environmental Consequences

3.3.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.3.2.1.1 Construction

3.3.2.1.1.1 Criteria Pollutants

Construction emissions are primarily based on estimated operational time and number of workdays to complete each phase of the Proposed Action. Criteria pollutant emissions for construction of the Proposed Action were estimated using the U.S. Air Force's Air Conformity Applicability Model (ACAM). Although a construction period from 2026 to 2027 was used in the model, the actual dates may occur later. Because emissions from construction equipment generally decrease over time as newer, more efficient technologies replace older models, the 2026 to 2027 timeframe provides a reasonable upper bound for anticipated emissions. If construction occurs later, emissions would likely be lower due to the continued adoption of cleaner and more efficient equipment.

Under Alternatives 1 or 2, the Proposed Action would produce construction-related emissions over an approximately 18- to 24-month construction period. Activities would generate criteria pollutants from diesel-fueled off-road equipment (backhoes, loaders, graders, paving equipment), on-road heavy-duty vehicles (multi-axle delivery vehicles), workers' passenger vehicles, curing of asphalt pavement, and interior painting. Construction would also generate fugitive dust from earth-moving activities. The construction-related emissions would stop once construction is completed.

The estimated construction emissions calculated for Alternatives 1 and Alternative 2 are similar, as shown in Table 3**Error! Reference source not found.**. The tables use emissions of volatile organic compounds (VOC) to represent O_3 because VOCs may form ground-level O_3 by "reacting" with sources of oxygen molecules such as nitrogen oxides and CO in the atmosphere in the presence of sunlight.

Under Alternatives 1 or 2, the annual net changes in estimated emissions associated with construction of the OPC are below the PSD insignificance indicators. The insignificance indicators are trivial (*de minimis*) rate thresholds that have been demonstrated to have little to no impact to air quality. These indicators do not define a significant impact; however, they do provide a threshold to identify actions that are insignificant. Any action with net emissions below the insignificance indicators for all criteria pollutants is considered so insignificant that the action will not cause or contribute to an exceedance on one or more NAAQS.

Under Alternatives 1 or 2, the data show that the annual net changes in estimated emissions associated with the construction of the Proposed Action are below the insignificance indicators.

Therefore, construction of the Proposed Action under Alternatives 1 or 2 would have a temporary, negligible adverse impact on air quality.

3.3.2.1.1.2 Greenhouse Gas Emissions

GHG emissions generated during construction were also evaluated. Under Alternatives 1 or 2, construction of the Proposed Action would result in temporary GHG emissions from combustion of fossil fuels in construction equipment and vehicles, material production and transportation, and site preparation activities, including soil disturbance and grading. The GHG emissions from construction would end once the construction phase is finished. Though negligible, construction of either Alternative 1 or 2 would contribute GHG emissions to the region, but these emissions would stop once construction is completed.

To further reduce criterial pollutants and GHG emissions during construction of the Proposed Action, the private entity may incorporate the following strategies to the extent practicable:

- For construction equipment greater than 150 horsepower, aim to meet 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 vehicle tracking and the generation of dust by implementing best management practices (BMPs).

The private entity would be required to design and construct the facility to meet the Green Building Initiative Green Globes certification (GBI 2025), which seeks to reduce energy and utility consumption through sustainable design practices.

3.3.2.1.2 Operation

Under Alternatives 1 or 2, operation of the OPC would generate emissions primarily from vehicle traffic associated with patients, staff, and deliveries; heating, ventilation, and air conditioning (HVAC) systems; and monthly testing of two diesel-fueled emergency generators. The emissions associated with these operational activities would be similar under Alternatives 1 or 2, as shown in Table 3. These operational emissions are below the PSD insignificance indicators. Similar to the estimated construction emissions, 2028 was used in the ACAM model as the first year of operation; however, the actual start of operations may vary depending on the final construction timeline. While not negligible, VA has concluded the estimated GHG emissions from operation of the Proposed Action under Alternatives 1 or 2 would not be significant at a regional level.

Therefore, operation of the Proposed Action under Alternatives 1 or 2 would have a permanent, negligible adverse impact on air quality.

Table 3. Alternatives 1A, 1B, and 2 – Criteria Pollutant and GHG Emissions from Construction and Operation of the Proposed Action

Criteria Pollutant	Year 1, construction emissions (ton/yr)	Year 2, construction emissions (ton/yr)	Year 3, operational emissions (ton/yr)	Insignificance Indicator (ton/yr)
VOC	0.208	1.451	0.735	250
NO_2	1.778	1.386	0.917	250
CO	2.146	1.834	10.525	250
SO_2	0.004	0.003	0.019	250
PM_{10}	15.487	0.048	0.060	250
$PM_{2.5}$	0.062	0.044	0.058	250
Greenhouse Gas	**Year 1, construction emissions (ton/yr)**	**Year 2, construction emissions (ton/yr)**	**Year 3, operational emissions (ton/yr)**	**Threshold**
CO_2	436	336	1,613	Not established
Methane	0.02	0.01	0.06	Not established
Nitrous oxide	0.00	0.00	0.03	Not established
CO_2e	439	337	1,621	Not established

3.3.2.2 No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented, and existing air quality conditions would remain unchanged. Therefore, the No Action alternative would result in no impact on air quality.

3.4 Wildlife and Habitat

Considerations related to wildlife and habitat include the impacts of a project on wildlife including through direct habitat loss; habitat fragmentation; disruption of behavior; or the import, export, or taking of state or federally listed endangered species.

Species that are imperiled may be listed as endangered or threatened under the Endangered Species Act (ESA). In addition, specific locations may be mapped and identified as a listed species' designated critical habitat which support the continued conservation of imperiled species by guiding cooperation within the federal government. Under Section 7 of the ESA, all federal agencies are required to consult with the U.S. Fish and Wildlife Service (USFWS) about actions that they carry out, fund, or authorize to ensure that they will not harm a listed species (USFWS, 2024).

3.4.1 Affected Environment

The Alternative 1 and 2 sites are located in Benton County, Washington, which lies within the Columbia Plateau ecoregion, and features ecosystems typical of shrub-steppe, grasslands, riparian zones, and riverine landscapes (WDFW, 2025).

In November 2024, a biological habitat assessment was performed to assess the potential for federal and state protected species, critical habitats, or other sensitive resources to occur at the Alternative 2 site. An assessment was not conducted at the Alternative 1 site because the site was recently cleared and graded and does not provide suitable habitat for federal or state listed species.

The assessment involved a desktop review of known federally and state listed species known in the vicinity of each site. The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC),

which generates a list of federally threatened, endangered, proposed, and candidate species and habitats that may occur within or near the site. Additionally, available information was also obtained from the Washington Department of Fish and Wildlife (WADFW), Washington Natural Heritage Program (WANHP) "Rare Plants and Rare/High Quality Ecosystems" database, and other sources to identify the potential for the presence of state or federally listed species on or in the vicinity of each site. The assessment also considered the Migratory Bird Treaty Act (MBTA; 16 U.S.C. 703-712), which prohibits the pursuit, hunting, take, capture, kill, or sale of listed migratory bird species; and the Bald Eagle and Golden Eagle Protection Act (BGEPA; 16 U.S.C. 668-668c), which prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" eagles, including their parts, nests, or eggs.

Information collected during the desktop review was used in conjunction with the field assessment of land cover types to identify potential effects pursuant to the ESA.

The following sections describe the land cover for both the Alternative 1 and 2 sites and the biological habitat assessment findings for the Alternative 2 site.

3.4.1.1 Proposed Action – Alternatives 1A and 1B

3.4.1.1.1 Land Cover

The Alternative 1 site was cleared and graded between 2022 and 2023. Aerial photographs from this time period show vehicles, construction equipment, and piles of sand throughout the site. Aerial photographs from 1985 to 2008 show the site as undeveloped land with several paths crossing the interior. Aerial photographs from 2009 and later show construction roadways and other disturbance at the site. Currently, the site remains heavily disturbed from these prior activities and sparsely vegetated with low brush and grass. The site does not contain any sensitive or critical habitats. The Alternative 1 site is surrounded by roadways and densely developed commercial and residential properties.

3.4.1.2 Proposed Action – Alternative 2

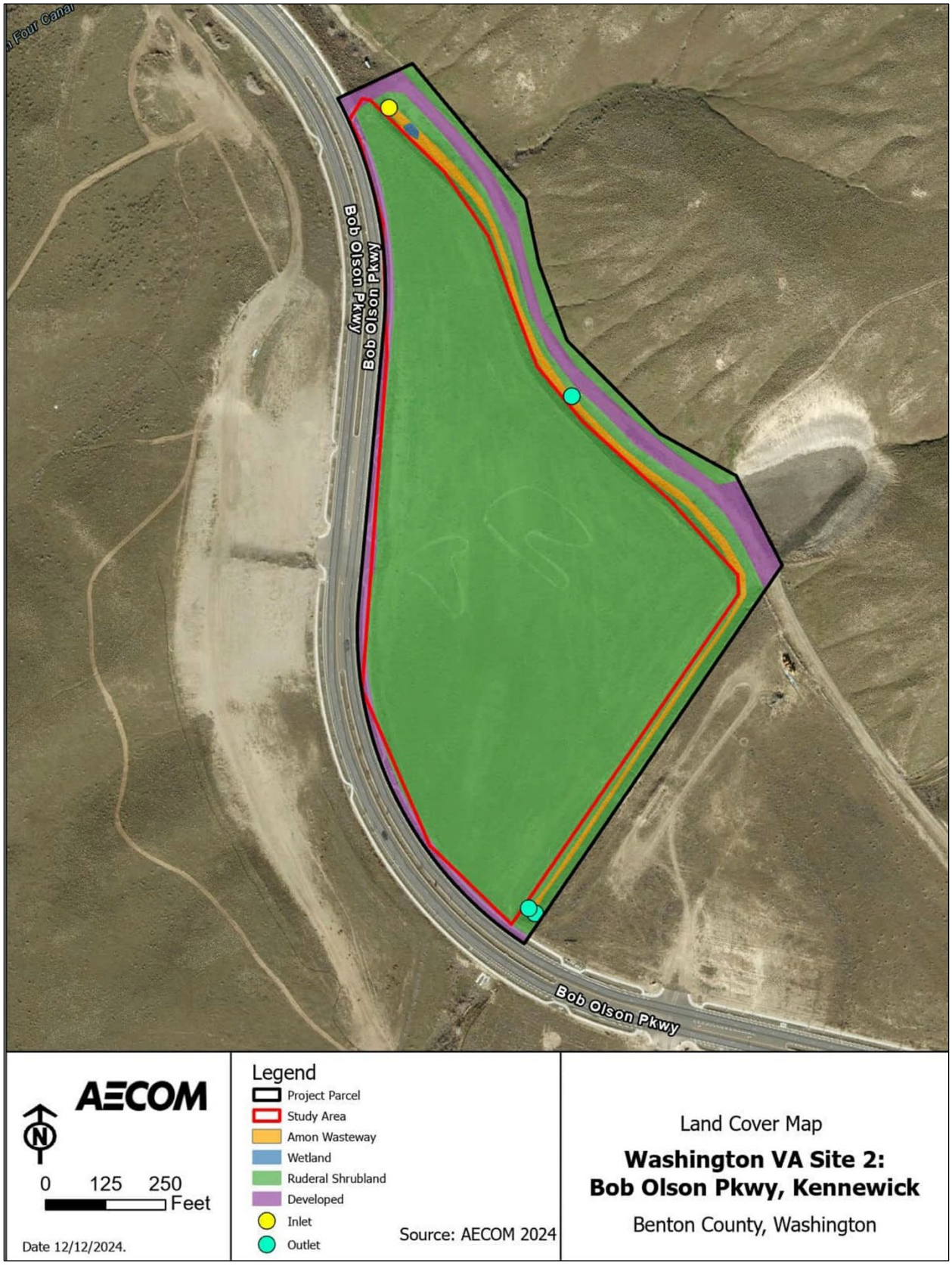
3.4.1.2.1 Land Cover

Historic aerial imagery indicates that prior to 2015, the Alternative 2 site was primarily shrubsteppe, with the Amon Wasteway's AP Lateral Drain and its associated riparian zone meandering through the site. This riparian zone appears to have included mature trees (likely composed of Russian-olive [*Elaeagnus angustifolia*]) and a dense shrub layer. However, development of the Bob Olson Parkway in 2015-2017 resulted in complete grading/flattening of the site, and re-routing of the Amon Wasteway's AP Lateral Drain into a highly channelized feature that runs along the eastern and northern boundaries of the site. After this development, the site was left completely devoid of woody vegetation, including mature trees.

In the subsequent years, weedy and/or generalist plant species have recolonized the site, which is now dominated by rubber rabbitbrush (*Ericameria nauseosa*) in the shrub layer, and cheatgrass (*Bromus tectorum*), white sweet-clover (*Melilotus albus*), diffuse knapweed (*Centaurea diffusa*), yellow starthistle (*Centaurea solstitialis*), and common yarrow (*Achillea millefolium*) in the herbaceous layer. A few Russian-olive saplings are present on the site but are less than eight feet tall. WADOE-designated noxious weeds were present at the site and include diffuse knapweed, kochia (*Kochia scoparia*), and yellow starthistle in upland shrubland areas, and reed canarygrass (*Phalaris arundinacea*), Canada thistle (*Cirsium arvense*), common reed (*Phragmites australis*), and saltcedar (*Tamarix* sp.) in wetland/wasteway areas.

The habitat assessment identified four land cover classifications at the site, including developed, ruderal shrubland, wetland, and the Amon wasteway. A land cover map is provided in Figure 7.

Figure 7. Alternative 2 – Proposed Action Site Land Cover



3.4.1.2.2 Federal Listed Species and Habitats

The USFWS IPaC report for the Alternative 2 site identified six species protected under the ESA that have potential to occur, including one mammal, one bird, three fish, and one insect. The IPaC report did not identify any critical habitat of protected species on or near the site.

The biological habitat assessment completed in November 2024 found that the Alternative 2 site did not contain any suitable habitat for any federal listed threatened or endangered species, or critical habitat on or near the Alternative 2 site.

3.4.1.2.3 State Listed Species and Habitats

State listed species and habitat information was obtained from the WADFW Priority Habitat and Species Mapper, WADFWs SalmonScape mapper, the Northwest Indian Fisheries Commission's Statewide Integrated Fish Distribution Mapper, and the WANHP "Rare Plants and Rare/High Quality Ecosystems" database. All WANHP and WADFW records within five miles of the Alternative 2 site were queried to identify state-listed plant and/or wildlife species with potential to occur.

The biological habitat assessment completed in November 2024 found that the Alternative 2 site had marginal habitat for the ferruginous hawk. No suitable habitat was found for any other state listed threatened, endangered, or candidate species on or near the Alternative 2 site.

3.4.1.2.4 Migratory Bird Treaty Act

The IPaC report identified birds of conservation concern (BCC) protected under the MBTA as having ranges with potential habitat overlapping the Alternative 2 site. This identification reflects the species' potential to occur in the broader geographic region based on mapped habitat ranges but does not confirm the presence of suitable habitat or individuals at the site itself.

The biological habitat assessment completed in November 2024 found that the Alternative 2 site did not have suitable habitat for MBTA birds.

3.4.1.2.5 Bald and Golden Eagle Protection Act

The IPaC report stated there is no habitat for bald or golden eagles at the Alternative 2 site nor in the immediate surrounding area. The biological habitat assessment completed in November 2024 confirmed there is no habitat for bald or golden eagles at the Alternative 2 site.

3.4.1.2.6 Critical Habitat

No designated critical habitat was identified during the November 2024 habitat assessment at the Alternative 2 site.

3.4.1.2.7 Plants

No protected plant species were observed during the November 2024 habitat assessment at the Alternative 2 site.

3.4.2 Environmental Consequences

3.4.2.1 Proposed Action – Alternatives 1A and 1B

3.4.2.1.1 Construction

The Alternative 1 site is heavily disturbed from recent clearing and grading and is sparsely vegetated with low brush and grass. As a result, the Alternative 1 site contained no suitable habitat for federal or state listed species.

Therefore, the construction of the Proposed Action at the Alternative 1 site would have no impact on federal or state listed species or their habitat.

3.4.2.1.2 Operation

Under Alternative 1, no further clearing of vegetation would occur following completion of the construction phase. The ornamental landscaped vegetation planted and established at the site during the construction phase is not anticipated to provide suitable habitat for listed species. Listed species would utilize suitable habitat available elsewhere in their range.

Therefore, under Alternative 1, the operation of the Proposed Action would have no impact on wildlife and habitat.

3.4.2.2 Proposed Action – Alternative 2

3.4.2.2.1 Construction

Under Alternative 2, construction of the Proposed Action would remove the existing habitat at the site during land clearing and grading. Based on the habitat assessment at the Alternative 2 site in November 2024, the ecosystems present are not habitat for federal, or state listed species because of a lack of suitable habitat features, the level of surrounding development and human presence, and a lack of known occurrences in the area. As a result, VA made a preliminary determination that implementing the Proposed Action at the Alternative 2 site would have "no effect" on any federal or state listed species.

Therefore, the construction of the Proposed Action under Alternative 2 would no impact on wildlife and habitat.

3.4.2.2.2 Operation

Under Alternatives 1 or 2, the site would be redeveloped and professionally landscaped. However, the landscaped vegetation, along with the regular presence of moving vehicles and people, would not be anticipated to provide suitable habitat for any listed species. Therefore, the operation of the Proposed Action would have no impact on wildlife and habitat.

3.4.2.3 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at the site or the surrounding area. Therefore, the No Action alternative would result in no impact on wildlife and habitat.

3.5 Floodplains, Wetlands, and Coastal Zone

Development in a floodplain may result in adverse impacts to the floodplain that can lead to the degradation and loss of natural functions and habitat. In particular, development could have direct and indirect detrimental impacts on the quantity and quality of floodplain habitats used by fish and other wildlife.

Protecting wetlands before construction is crucial because they act as natural filters for water preventing pollution from reaching waterways, help control flooding by absorbing excess rainwater, provide vital habitats for wildlife, and can contribute to shoreline erosion control.

The coastal zone is a legislatively defined geographic region that establishes the area regulated under the federal Coastal Zone Management Act (CZMA), encompassing both land and water areas.

3.5.1 Affected Environment

3.5.1.1 Floodplains

3.5.1.1.1 Alternatives 1A and 1B

The Alternative 1 site is located on the U.S. Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), panel number 5302370615B (effective 7/19/1982). FEMA shows that this panel has not been printed by FEMA because the area is in Zone C, which FEMA defines an area of minimal flood hazard, often located above the 500-year flood level (FEMA, 2020).

3.5.1.1.2 Alternative 2

The Alternative 2 site is partially located on FEMA FIRM panels 530237-0615B and 530237-0605B (both effective 7/19/1982). FEMA shows that both panels have not been printed by FEMA because the areas they cover are in Zone C, which FEMA defines an area of minimal flood hazard, often located above the 500-year flood level (FEMA, 2020).

3.5.1.2 Wetlands and Water Resources

Wetlands and water resources within the Alternative 1 and 2 sites were identified via desktop analysis, and site visits confirmed jurisdictional waters under the Clean Water Act at the Alternative 2 site.

3.5.1.2.1 Alternatives 1A and 1B

The USFWS National Wetland Inventory (NWI) shows no jurisdictional wetlands, streams, or water resources are located within or adjacent to the Alternative 1 site. The nearest water body is a constructed pond at the Village at Southridge, located approximately 3,300 feet east of the Alternative 1 site.

3.5.1.2.2 Alternative 2

The USFWS NWI maps showed wetlands at the site. National Hydrography Dataset (NHD)-mapped streams match the NWI features, except the NWI mapped one of the features as a vegetated wetland (PFO1C). The NHD data shows both waterbodies as intermittent streams. Based on review of aerial imagery, it appears that both the NWI and NHD data are mapping features that may have existed prior to clearing and grading of the Alternative 2 site that occurred during the construction of Bob Olson Parkway.

On November 26, 2024, an on-site field delineation focused on identifying wetland areas, surface water features, and their ecological functions was performed at the Alternative 2 site. The survey identified an approximately 0.012 acre wetland depression within the site, but outside of the proposed OPC development footprint. The wetland is hydrologically connected to the Amon Wasteway AP Lateral Drain, a constructed drainage feature that conveys stormwater. The wetland is classified as a riverine wetland, with hydrology primarily provided by irrigation return flows in the ditch. The Cowardin class is emergent with a temporarily flooded water regime. Figure 8 depicts the location of these features at the Alternative 2 site. As shown on this figure, the wetland is located within the property parcel boundary but is outside of the proposed study area which is defined as the area where the proposed OPC development would occur.

Given that the wetland and Amon Wasteway's AP Lateral Drain are almost entirely maintained by irrigation return flows, and that the wasteway itself is a constructed feature, it is unlikely that USACE or WADOE would consider the wetland and/or the wasteway jurisdictional. Additionally, as the Amon Wasteway has historically been determined to not qualify as a critical area (albeit in reference to a different section of the wasteway), it is also unlikely that the City of Kennewick would consider it a Critical Area under its municipal code.

3.5.1.3 Coastal Zone

The Alternative 1 and 2 sites are not located in the Washington State coastal zone. This environmental resource topic is not further analyzed in this EA.

3.5.2 Environmental Consequences

3.5.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.5.2.1.1 Floodplains

Both the Alternative 1 and 2 sites are located in the FEMA designated Zone C, which FEMA defines an area of minimal flood hazard, often located above the 500-year flood level (FEMA, 2020). As a result, the construction or operation of the Proposed Action under either Alternative 1 or 2 would have no impact on floodplains.

3.5.2.1.2 Wetlands and Water Resources

3.5.2.1.2.1 Alternatives 1A and 1B

The Alternative 1 site does not contain any wetlands or water resources. Therefore, under Alternative 1, the construction and operation of the Proposed Action would have no impact on wetlands or water resources.

3.5.2.1.2.2 Alternative 2

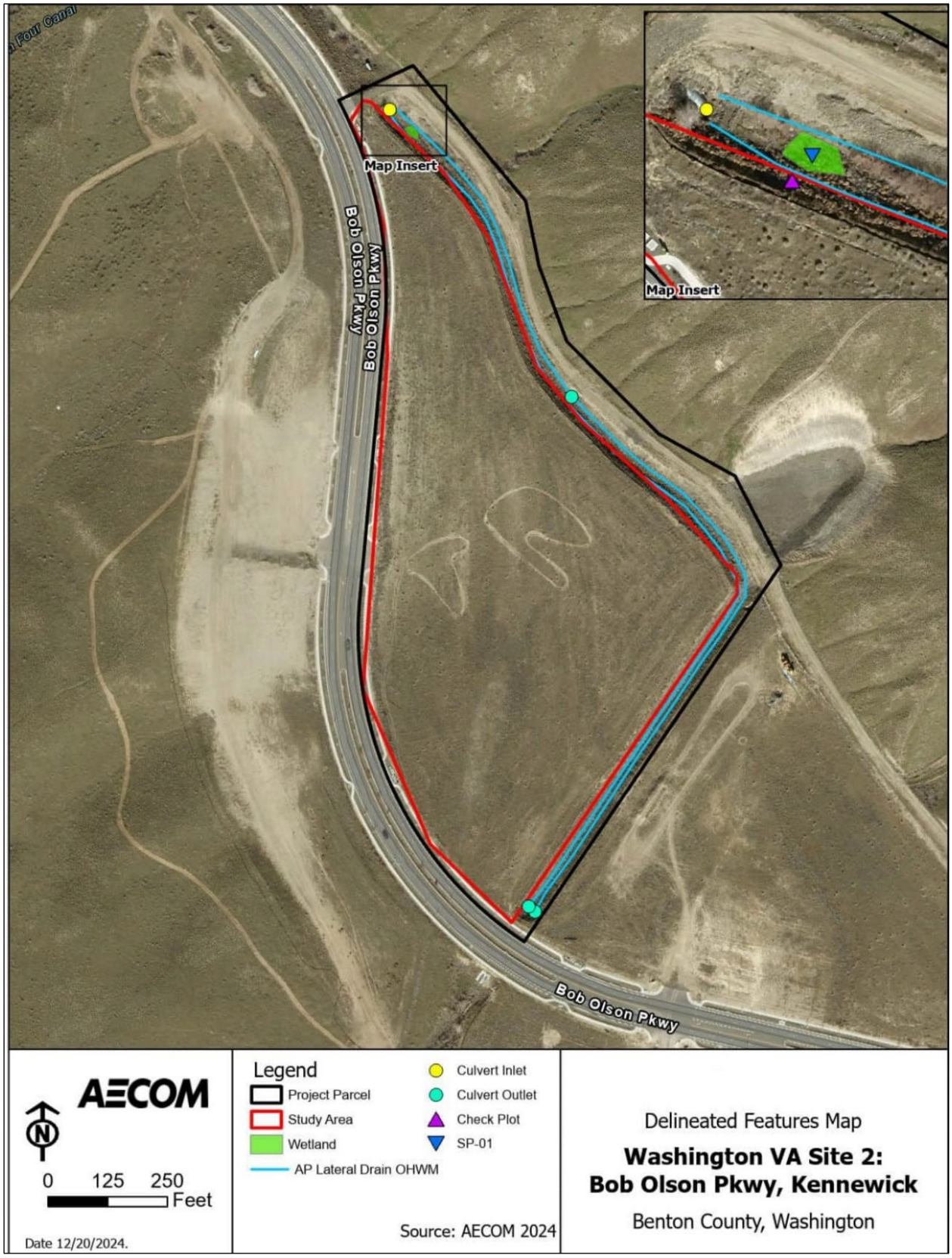
Based on the Alternative 2 conceptual OPC development plan (Figure 3), no development activities would occur within approximately 300 feet of the delineated wetland, and no development is proposed to occur within the Amon Wasteway's AP Lateral Drain. Therefore, the wetland identified within the drain would not be impacted. The private entity would ensure the final design plan for the OPC development would avoid any permanent impacts to these resources.

Therefore, under Alternative 2, the construction and operation of the Proposed Action would have no impact on wetlands or water resources.

3.5.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions. Therefore, the No Action alternative would result in no impact on floodplains, wetlands or water resources, or coastal zone resources.

Figure 8. Alternative 2 – Wetlands and Waters of the U.S. Survey Findings



3.6 Cultural and Historic Resources

Cultural resources and historic properties include both archaeologically significant elements and built environment elements. The National Historic Preservation Act (NHPA) of 1966, as amended, provides for the preservation of historic properties. Section 106 of the NHPA requires that federal agencies consider the effects of their actions on such properties. Section 110 of the NHPA requires all federal agencies to assume responsibility for the preservation of historic properties under federal agency ownership or control.

3.6.1 Affected Environment

At both the Alternative 1 and 2 sites, an Initial Cultural Resource Impact Prediction (ICRIP) study and a Phase I archaeological survey were performed. The studies included background research, pedestrian surveys, and subsurface testing in accordance with Section 106 of the NHPA. The following sections describe the results from these studies.

3.6.1.1 Proposed Action – Alternatives 1A and 1B

3.6.1.1.1 Initial Cultural Resource Impact Prediction Study

In October 2024, VA completed an ICRIP study at the Alternative 1 site to assess the potential effects of the Proposed Action/undertaking to historic properties within the Area of Potential Effects (APE) in compliance with Section 106 of the NHPA. The APE, as defined in 36 CFR 800.16(d), is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

The ICRIP study included a review of all properties on and near the proposed Alternative 1 site through fieldwork and research and defined a recommended APE. The ICRIP study concluded that there are no known National Register of Historic Places (NRHP) listed or eligible properties in the APE.

3.6.1.1.2 Phase I Archaeological Survey

On December 16 and 17, 2024, VA completed an archaeological pedestrian survey and Phase I testing within the 11.53-acre area that would be subject to ground disturbance during construction of the proposed OPC under either Alternative 1A or 1B.

The study found that no cultural resources were identified during fieldwork and supported a finding of no historic properties affected within the Alternative 1 site. No further archaeological investigation was recommended at the Alternative 1 site.

3.6.1.1.3 Section 106 Consultation

On December 10, 2024, VA emailed the SHPO, City, County, and Tribes a scoping notice that described the Proposed Action/undertaking and sought input on its effects on historic properties. The scoping notice also explained that NEPA procedures for public involvement would be applied instead of those in Subpart B of the Section 106 regulations, and that VA would conduct its Section 106 review and consultation separately.

Subsequently, and based on the ICRIP and Phase I archaeological studies completed at the Alternative 1 site, VA determined that there are no known NRHP listed or eligible properties within the APE. As a result, VA concluded that implementing the Proposed Action/undertaking at the Alternative 1 site would result in a finding of no historic properties affected in accordance with 36 CFR 800.4(d)(1).

On September 2, 2025, VA initiated Section 106 consultation as required under the NHPA with the Washington State Department of Archaeology and Historic Preservation (the State Historic Preservation Office [SHPO]), Kennewick Historic Preservation Commission, Benton County Planning Division, Kennewick Certified Local Government, and the four federally recognized Indian tribes with ancestral ties to the area: Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, and Nez Perce Tribe.

On September 2, 2025, the WA SHPO provided written concurrence with VA's finding of no historic properties affected for Alternative 1. Copies of Section 106 consultation correspondence are included in Appendix B.

3.6.1.2 Proposed Action – Alternative 2

3.6.1.2.1 Initial Cultural Resource Impact Prediction Study

In October 2024, VA completed an ICRIP study at the Alternative 2 site to assess the potential effects of the Proposed Action/undertaking to historic properties within the APE in compliance with Section 106 of the NHPA.

The ICRIP study included a review of all properties on and near the proposed Alternative 2 site through fieldwork and research and defined a recommended APE. The ICRIP study concluded that there are no known NRHP listed or eligible properties in the APE.

3.6.1.2.2 Phase I Archaeological Survey

On December 16 and 17, 2024, VA completed an archaeological pedestrian survey and Phase I testing within the 14.4-acre area that would be subject to ground disturbance during construction of the proposed OPC under Alternative 2.

The study found that no cultural resources were identified during fieldwork and supported a finding of no historic properties affected within the Alternative 2 site. No further archaeological investigation was recommended at the Alternative 2 site.

3.6.1.2.3 Section 106 Consultation

On December 10, 2024, VA emailed the SHPO, City, County, and Tribes a scoping notice that described the Proposed Action/undertaking and sought input on its effects on historic properties. The scoping notice also explained that NEPA procedures for public involvement would be applied instead of those in Subpart B of the Section 106 regulations, and that VA would conduct its Section 106 review and consultation separately.

Subsequently, and based on the ICRIP and Phase I archaeological studies completed at the Alternative 2 site, VA determined that there are no known NRHP listed or eligible properties within the APE. As a result, VA concluded that implementing the Proposed Action/undertaking at the Alternative 2 site would result in a finding of no historic properties affected in accordance with 36 CFR 800.4(d)(1).

On September 2, 2025, VA initiated Section 106 consultation as required under the NHPA with the Washington State Department of Archaeology and Historic Preservation (the State Historic Preservation Office [SHPO]), Kennewick Historic Preservation Commission, Benton County Planning Division, Kennewick Certified Local Government, and the four federally recognized Indian tribes with ancestral ties to the area: Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, and Nez Perce Tribe.

On September 2, 2025, the WA SHPO provided written concurrence with VA's finding of no historic properties affected for Alternative 2. Copies of Section 106 consultation correspondence are included in Appendix B.

3.6.2 Environmental Consequences

3.6.2.1 Proposed Action – Alternatives 1A, 1B, and 2

As previously described, VA and the SHPO concluded that the Proposed Action/undertaking under Alternative 1 or 2 would result in no historic properties affected, pursuant to 36 CFR 800.4(d)(1). The Final EA will be updated to describe any responses received from other consulting parties.

3.6.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at either the Alternative 1 or 2 sites. Therefore, the No Action alternative would result in no effect on historic properties.

3.7 Geology and Soils

The geology of an area includes surface and bedrock materials, its orientation and faulting, and geologic resources such as mineral deposits, petroleum reserves, and fossils. Soils refer to unconsolidated earthen materials overlaying bedrock or other parent material. Excavation, soil erosion, soil compaction, soil horizon removal, grading, and cutting and filling operations can result in a potential loss of soils and/or changes in geology.

3.7.1 Affected Environment

3.7.1.1 Proposed Action – Alternatives 1A, 1B, and 2

3.7.1.1.1 Geology

Kennewick, WA, is located within the Columbia Plateau, a geologic province dominated by the Columbia River basalt group, which consists of thick layers of basaltic lava flows deposited between 17 and 16 million years ago (USGS, 1990). These lava flows form much of the bedrock in the region. Overlying the basalt are layers of wind-blown silt and Missoula flood deposits, which include sand, gravel, and silts, deposited by the massive glacial outburst floods that shaped the region around 12,000 to 15,000 years ago. This event is known as the Spokane Flood, during which the massive water flow carved the landscape in its wake, creating distinct landforms like the Channeled Scablands. The area around the Tri-Cities is known to have the Yakima Fold Belt pass through, which consists of parallel anticlinal ridges and synclinal valleys. The Project area includes Pleistocene outburst flood deposits and fluvial gravels interbedded with silt lenses and is overlain by loess.

Seismically, Kennewick is in a region of low to moderate earthquake hazard (USGS, 2014). However, both the Alternative 1 and 2 sites are near the Wallula Fault Zone, Rattlesnake Hills Fault Zone, and the Horse Heaven Hills Fault Zone (WADNR, 2014). These fault zones are part of the active fault system in southeastern Washington that forms part of the larger Olympic-Wallowa Lineament, a major geologic structure extending across the region. The City of Kennewick identifies portions of both the Alternative 1 and 2 sites as located in areas with liquefaction hazards.

3.7.1.2 Proposed Action – Alternatives 1A and 1B

3.7.1.2.1 Soils

The U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) mapping shows three soils at the Alternative 1 site. Although the NRCS maps show slopes range from 2-30%, the site has been graded flat and has no substantive slope. The NRCS reported features for these soils are shown in Table 4 and depicted on Figure 9.

3.7.1.2.2 Prime Farmland

Designated farmland soils are comprised of three classes of soils that have been identified by NRCS: prime farmland, unique farmland, and farmland of statewide or local importance. These soil classes have been identified as contributing to the agricultural productivity of the country and should be protected from conversion to non-agricultural uses by federal programs.

Prime farmland is defined by the NRCS as "land that has the best combination of physical and chemical characteristics" for agriculture. This includes land with these characteristics used for livestock or timber production but not land that is already urbanized or used for water storage. Unique farmland is defined as "land other than prime farmland that is used for production of specific high value food and fiber crops," with such crops defined by the Secretary of Agriculture. Farmland of statewide or local importance is defined as "farmland, other than prime or unique farmland, that is of statewide or local importance for the production of food, feed, fiber, forage, or oilseed crops."

NRCS classifies Warden silt loam as farmland of statewide importance or of unique importance but is not prime farmland soil and is already urbanized.

Table 4. Alternative 1 – NRCS Mapped Soil Characteristics

Soil Name (NRCS map ID)	Drainage Classification	Prime Farmland	Acres	Percent in Site
Warden silt loam, 2 to 5 percent slopes (WdB)	Well drained	No. Soil is farmland of statewide importance	2.6	24.2%
Warden silt loam, 8 to 15 percent slopes (WdD)	Well drained	No. Soil is farmland of unique importance	7.1	64.9%
Warden silt loam, 15 to 30 percent slopes, severely eroded (WdE3)	Well drained	No. Soil is farmland of unique importance	1.2	10.9%

3.7.1.3 Proposed Action – Alternative 2

3.7.1.3.1 Soils

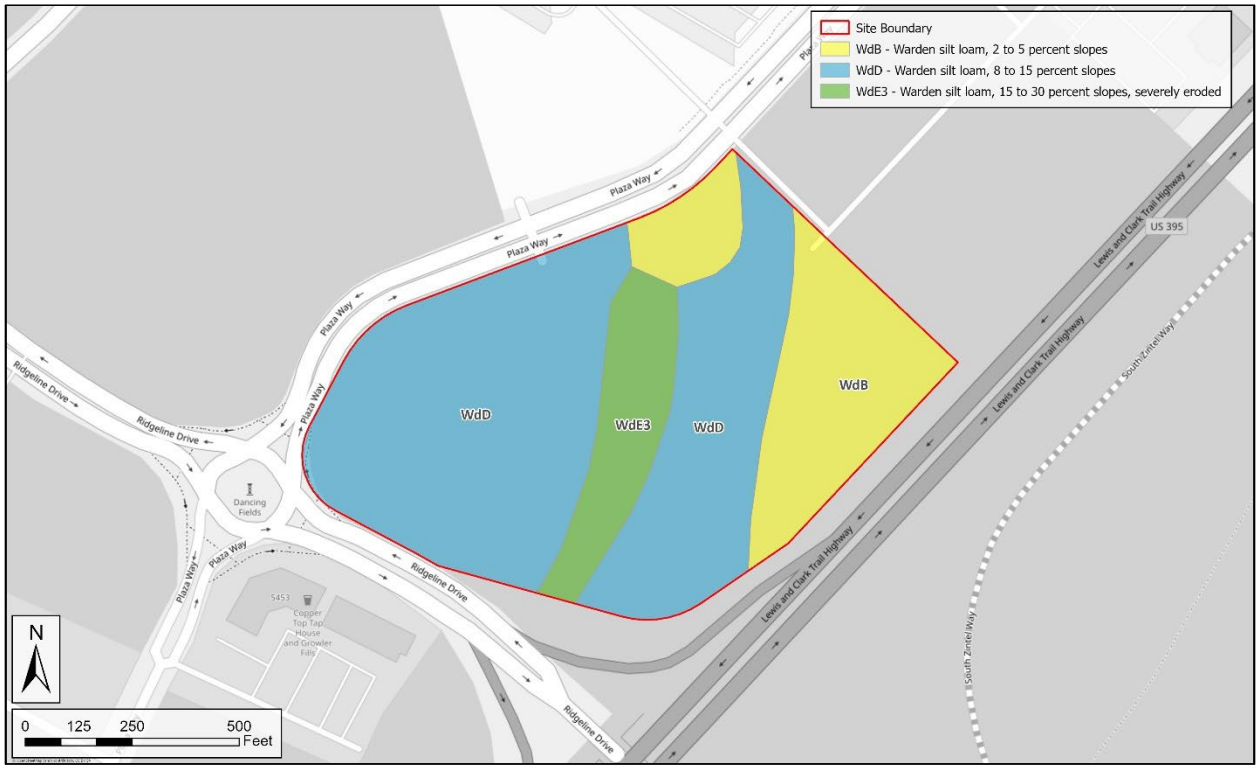
The NRCS mapping shows five soils at the Alternative 2 site (USDA, 2024). Slopes within the site vary from 2 to 30%. The soils with the 15-30% slopes are located along the southern and northern portions of the site, while the interior of the site is generally flat with 5% or less slopes. The NCRS reported features for these soils are shown in Table 5 and depicted on Figure 10.

3.7.1.3.2 Prime Farmland

NRCS classifies the Esquatzel fine sandy loam, Finley fine sandy loam, and Warden silt loam (0-5% slope) as prime farmland if irrigated (Table 5). Warden silt loam as farmland of statewide importance or of unique importance but is not prime farmland soil and is already urbanized.

However, during construction of Bob Olson Parkway in 2015-2017, the topsoil at the site was stripped, and the site was regraded and built-up. As a result, the soils at the site have been urbanized and do not meet the NRCS definition for prime farmland. A summary of the mapped soils, including prime farmland classifications, are shown in Table 5 and depicted on Figure 10.

Figure 9. Alternative 1 – NRCS Mapped Soils

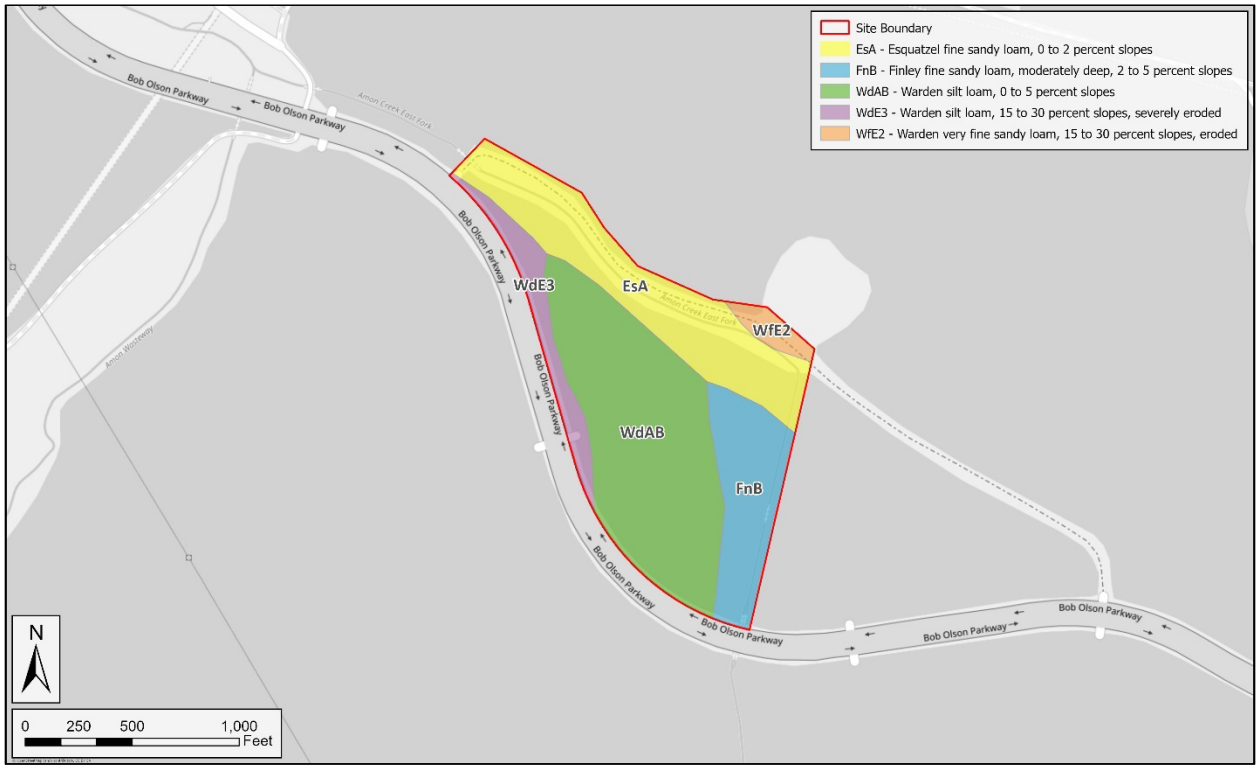


3.7.1.4 Proposed Action – Alternative 2

Table 5. Alternative 2 – NRCS Mapped Soil Characteristics

Soil Name	Drainage Classification	Prime Farmland	Acres	Percent in Site
Esquatzel fine sandy loam, 0 to 2 percent slopes	Well drained	No. Prime farmland has been disturbed and urbanized	5.6	29.00%
Finley fine sandy loam, moderately deep, 2 to 5 percent slopes	Well drained	No. Prime farmland has been disturbed and urbanized	3.2	16.5%
Warden silt loam, 0 to 5 percent slopes	Well drained	No. Prime farmland has been disturbed and urbanized	8.5	44.2%
Warden silt loam, 15 to 30 percent slopes, severely eroded	Well drained	No. Farmland of unique importance has been disturbed and urbanized	1.5	7.5%
Warden very fine sandy loam, 15 to 30 percent slopes, eroded	Well drained	No. Farmland of unique importance has been disturbed and urbanized	0.5	2.7%

Figure 10. Alternative 2 – NRCS Mapped Soils



3.7.2 Environmental Consequences

3.7.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.7.2.1.1 Construction

3.7.2.1.1.1 Geology

Under Alternatives 1 or 2, the construction of the OPC is not anticipated to encounter bedrock. No mineral resource impacts are anticipated, as the Proposed Action would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, state, national, or global basis. The private entity would design and construct all buildings to meet or exceed federal, state, and local seismic codes, which are intended to reduce the risk of damage and improve safety during earthquakes (ASCE, 2022).

As a result, the construction of the Proposed Action under Alternatives 1 or 2 would have no impact on geological resources.

3.7.2.1.1.2 Soils

Under Alternatives 1 or 2, construction would expose soil during grading and site development for the OPC, utilities, parking areas, entrances, and other project components. Exposed soils are more susceptible to erosion by wind and surface water run-off, resulting in off-site discharge of sediment-laden runoff.

Construction activities would disturb more than one acre of land. As a result, the private entity would be required to apply for and obtain coverage under the Washington State Department of Ecology Construction Stormwater General Permit (WADOE, 2024). To manage soil erosion, the private entity would be responsible for implementing and maintaining the BMPs specified in the *2024 Stormwater Management Manual for Eastern Washington* (WADOE, 2024).

The private entity would also implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impact of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality. Releases of regulated quantities of petroleum-based fluids would be reported to VA and Washington State Department of Ecology and cleaned up per state regulatory requirements.

Therefore, the construction of the Proposed Action under Alternatives 1 or 2 would have a temporary, minor adverse impact on soil quality.

3.7.2.1.2 Operation

3.7.2.1.2.1 Geology

Under Alternatives 1 or 2, the operation of the Proposed Action would have no mechanism to impact bedrock and therefore there would be no impact on geological resources.

3.7.2.1.2.2 Soil

Under Alternatives 1 or 2, during operation of the OPC, soils previously exposed during construction would be revegetated or covered with structures, asphalt/paving, or landscaping. The private entity would ensure that stormwater management facilities, which help to prevent soil erosion due to stormwater runoff, would function as designed for the duration of VA's lease.

Therefore, the operation of the Proposed Action under Alternatives 1 or 2 would have no impact on soils.

3.7.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions. Therefore, the No Action alternative would result in no impact on soil.

3.8 Hydrology and Water Quality

Hydrology and water quality considerations relate to both surface water and groundwater and the impact of stormwater on both. Stormwater is surface water runoff generated from precipitation and has the potential to introduce sediments and other pollutants into surface waters. Impervious surfaces such as buildings, roads, parking lots, and even some natural soils increase surface runoff. Stormwater infrastructure includes the manufactured conveyance systems that function together with natural drainages to collect and control the rate of surface runoff during and after a precipitation event. In urbanized areas, stormwater that is not infiltrated into the ground or discharged to a waterbody may be conveyed to stormwater management systems which are designed to contain runoff on site during construction and to maintain predevelopment stormwater flow characteristics following development through either the application of infiltration or retention practices.

3.8.1 Affected Environment

The USEPA defines the ecoregion encompassing the Alternative 1 and 2 sites as the Pleistocene Lake Basins, part of the larger Columbia Plateau (USEPA, 2016). The Columbia Plateau is the largest ecoregion in Washington and occupies nearly one-third of the state. It is dominated by the Columbia River and its tributaries and is bordered by the Cascade Range and the Rocky and Blue mountains. It is a landscape of glacial deposits, coulees, channeled scablands, and rolling areas of deep soil. The semi-arid climate supports native shrubsteppe vegetation as well as other drought-tolerant plant communities (WWHCWG, 2025). The average annual precipitation in Benton County, WA is approximately 8.2 inches (NOAA, 2025).

3.8.1.1 Proposed Action – Alternatives 1A and 1B

3.8.1.1.1 Surface Water

The Alternative 1 site has no surface water bodies.

3.8.1.1.2 Groundwater Characteristics

The USGS National Water Information System shows there is an inactive groundwater well (Site 461050119104801) located approximately 0.6 miles to the northeast of the Alternative 1 site. USGS reported the groundwater depth as 180 – 154.40 feet below ground surface between the years of 1978 and 1987 (USGS, 2025). Based on regional topography, groundwater flow direction is inferred to be northeast toward the Columbia River.

3.8.1.1.3 Stormwater Management and Drainage Patterns

Based on the USGS Kennewick, WA quadrangle 7.5-minute series topographic map, the Alternative 1 site is located approximately 758 feet above mean sea level. The map contour lines show the site generally slopes toward the northeast. The site is almost entirely pervious. The Alternative 1 site is entirely disturbed, vacant, and has no existing stormwater management features.

3.8.1.1.4 Water Quality Conditions

Watersheds, or drainage basins, are areas of land that drain into rivers or bodies of water. USGS shows the site is in the Zintel Canyon subwatershed (HUC 12 – 170200160603), which is within the larger Upper Columbia Basin (USGS, 2025). The USEPA "How's My Waterway" online system and USGS water data monitoring locations near Kennewick, WA, indicate that there are no assessed waterbodies in the Zintel Canyon watershed. Due to the lack of available data, the water quality for subwatershed HUC 12 – 170200160603 is currently undetermined. The nearest watershed, City of Kennewick-Columbia River (WA 170200160604), was reported in 2018 as having an impaired waterbody condition.

3.8.1.2 Proposed Action – Alternative 2

Prior to construction of Bob Olson Highway beginning in 2015, historic aerial imagery shows that prior to 2015, the Alternative 2 site was primarily shrubsteppe, with a watercourse and its associated riparian zone meandering through the site. This watercourse is part of the Amon Wasteway, a collection of waterways (some consisting of constructed irrigation canal features) occurring within the Amon Basin, which ultimately discharge irrigation water to the Yakima River near its confluence with the Columbia River. The portion of the Amon Wasteway occurring on the Project parcel is commonly referred to as the Amon Wasteway's AP Lateral Drain.

This riparian zone appears to have included mature trees (likely composed of Russian-olive [Elaeagnus angustifolia]) and a dense shrub layer. However, development of the Bob Olson Parkway in 2015-2017 resulted in complete grading and flattening of the site, and re-routing of the Amon Wasteway's AP Lateral Drain into a highly channelized feature that runs along the eastern and northern boundaries of the Alternative 2 site.

The re-routing of the Amon Wasteway's AP Lateral Drain on the Alternative 2 site resulted in the placement of a large ditch feature along the eastern and northern boundaries of the site. Banks leading down from the recently graded area are very steep and are composed of cobble-sized rock. A pair of culverts direct water flow to the north under the Bob Olson Parkway (at the southeast corner of the site), and a culvert inlet is also present at the northeast end where the Amon Wasteway's AP Lateral Drain leaves the site. Additionally, a culvert outlet is present at the northern end of the site, presumably associated with stormwater infrastructure present to the north of the site.

Historic aerial imagery indicates that there is likely only water in the feature during significant storm events, or when the feature receives excess irrigation water from the canal system and from lands within this area of the Kennewick Irrigation District. Historic aerial imagery indicates that ponding can sporadically occur in the portion of the ditch feature that runs along the northern boundary of the site, likely occurring when the feature receives excess irrigation water.

Following regrading of the site during construction of Bob Olson Parkway, the former drainages on the site were channelized and organized into ditch features that now skirt the perimeter of the site. Consequently, the waterbodies mapped by the NWI and/or NHD datasets do not reflect current Alternative 2 site conditions.

3.8.1.2.1 Surface Water

The Alternative 2 site has no surface water bodies.

3.8.1.2.2 Groundwater Characteristics

The USGS National Water Information System shows there is an active groundwater well (Site 461156119133001) located approximately 0.5 miles to the north of the Alternative 2 site. USGS recorded the groundwater depth at 121.85 to 105.59 feet below ground surface between the years 1976 to 2002 (USGS, 2025b).

The State Washington Department of Ecology, Well Construction & Licensing website shows the depth to groundwater was measured at approximately 23-feet below ground surface in a well located directly south of the site on May 17, 1982 (well report identification number 146374) (WADOE, 1982). Based on regional topography, groundwater flow direction is inferred to be northeast toward the Columbia River.

3.8.1.2.3 Stormwater Management and Drainage Patterns

The elevation of the Alternative 2 site is approximately 644 feet above mean sea level (United States Geological Survey [USGS] Kennewick, Washington 7.5-minute topographic quadrangle). The site slopes to the north-northwest.

During the wetland survey in November 2024, one watercourse was observed at the Alternative 2 site (Figure 8); this drainage feature runs along the eastern and northern boundaries of the site and is known as the Amon Wasteway's AP Lateral Drain. This feature was dry at the time of the investigation.

Much of the water that flows through the feature comes from agricultural irrigation return flows. The "Amon Wasteway is a designed and (in some places) constructed feature of the Kennewick Irrigation District operating system. Its purpose is to drain excess irrigation water away from the canal system and from lands within this area of the district" (KID, 2024). It is estimated that natural flow contributes less than 1% of the overall flow, with the remainder being provided by irrigation water. Additionally, flows can be infrequent and may only occur when irrigation return flows are drained into these features.

Several culvert features were documented within the wasteway on the site. One approximately 6-foot-diameter culvert is present at the northwest end of the site, where the wasteway leaves the site and continues downstream to the northwest. A pair of approximately 5-foot-diameter culverts are also present at the southeast corner where the wasteway enters the site. Additionally, a smaller 6-inch-diameter culvert is present along the northern border of the site, where stormwater discharges into the wasteway.

3.8.1.2.4 Water Quality Conditions

Watersheds, or drainage basins, are areas of land that drain into rivers or bodies of water. USGS shows the site is in the Coyote Canyon subwatershed (HUC 12 - 170300031204), which is within the larger Yakima Basin (USGS, 2025). According to the USEPA "How's My Waterway" online system and USGS water data

monitoring locations near Kennewick, WA, there are no assessed waterbodies in the Coyote Canyon watershed. Due to the lack of available data, the water quality for subwatershed (HUC 12 – 170300031204) is currently undetermined. The nearest watershed, Yakima River (170300031205), was reported to have impaired waterbody conditions in 2018.

3.8.2 Environmental Consequences

3.8.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.8.2.1.1 Construction

Under Alternatives 1 or 2, construction activities would include clearing and grading the site soils, which would require removing vegetation and exposing soils, which can lead to increased erosion during storm events. Additionally, grading and site reconfiguration may disrupt existing drainage patterns, leading to ponding in low-lying areas.

To minimize potential impacts on hydrology and water quality during construction, the private entity would obtain the WADOE Construction Stormwater General Permit and implement and maintain permit-required BMPs, such as bioretention areas, vegetated swales, and retention basins. Additionally, the private entity would establish a Spill Prevention, Control, and Countermeasure plan and train workers on how to respond to accidental releases of petroleum-based fluids to prevent impacts to groundwater during the construction phase.

Therefore, the construction of the Proposed Action under Alternatives 1 or 2 would have a permanent, negligible adverse impact on hydrology and water quality.

3.8.2.1.2 Operation

Under Alternatives 1 or 2, the conceptual OPC design would result in an increase in the impervious surface area at either site due to the presence of building, parking lots, and access roads. Table 2 shows the approximate addition of impervious surface area for each proposed OPC conceptual design. Stormwater generated at the site during operation of the Proposed Action may contain oils, grease, heavy metals, and other contaminants associated with vehicles and maintenance activities. Additionally, increasing impervious areas could permanently impact hydrology by reducing stormwater infiltration and groundwater recharge.

To minimize stormwater run-off during operation, on-site stormwater management systems installed during construction would be maintained as designed to reduce off-site migration of stormwater runoff. The conceptual OPC development plan for Alternative 1A shows two underground stormwater detention ponds; Alternative 1B includes an on-site stormwater bio-infiltration pond and a gravel infiltration gallery for roof drainage; and Alternative 2 includes a stormwater detention area in the northwest portion of the site.

Therefore, under Alternative 1 or 2, the operation of the Proposed Action is anticipated to have a permanent, negligible adverse impact on hydrology and water quality.

3.8.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions. Therefore, the No Action alternative would have no impact on hydrology and water quality.

3.9 Land Use

Considerations related to land use help to provide insights into existing land use patterns, identify potential conflicts, and inform decisions related to zoning and infrastructure planning.

3.9.1 Affected Environment

3.9.1.1 Proposed Action – Alternatives 1A and 1B

The Alternative 1 site zoning is identified by the City of Kennewick as CC (Commercial – Community). The city states the purpose of the CC district is to "stabilize, improve and protect commercial areas, and to provide for orderly growth in new commercial areas in accord with the Comprehensive Plan. CC districts are intended for a wide range of uses to serve the community area to which they are appurtenant" (City of Kennewick, 2024). Adjacent zones to the east, south and west are also zoned for Commercial – Community. To the north of the site, there are areas of Commercial – Regional zoning. Land use in the general area shows the Alternative 1 site is in an area with mixed development densities and other open spaces (Figure 11).

3.9.1.2 Proposed Action – Alternative 2

The Alternative 2 site zoning is identified by the City of Kennewick online mapping tool as CC (Commercial – Community)" (City of Kennewick, 2024). Parcels on the south side of Bob Olson Parkway are also zoned as Commercial – Community. Zoning to the north and west of the site are designated as RL (Residential – Low Density). The area located immediately to the east of the site is zoned as RH (Residential – High Density); however, the nearest residence located approximately 1,600 feet further east. The Benton County land cover map shows the Alternative 2 site is in an area with mixed development densities and other open spaces (Figure 12).

Figure 11. Alternative 1 – Land Use Cover Map

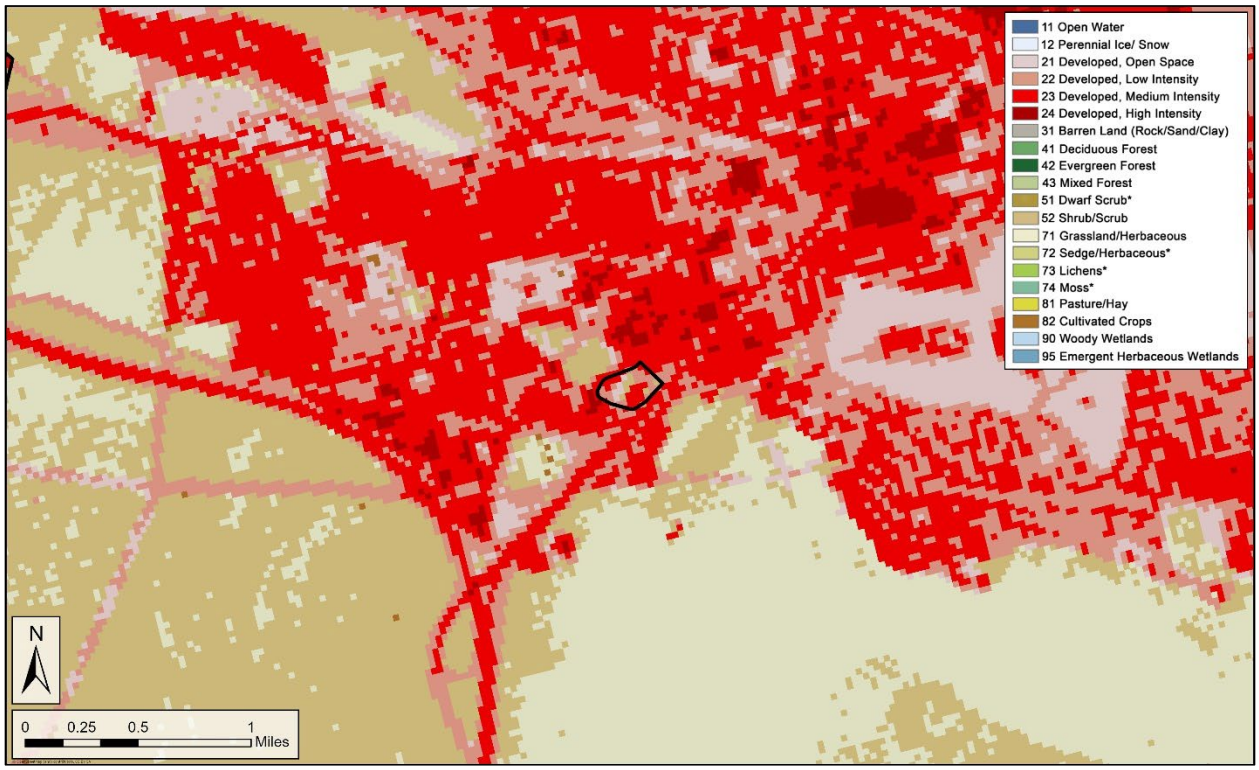
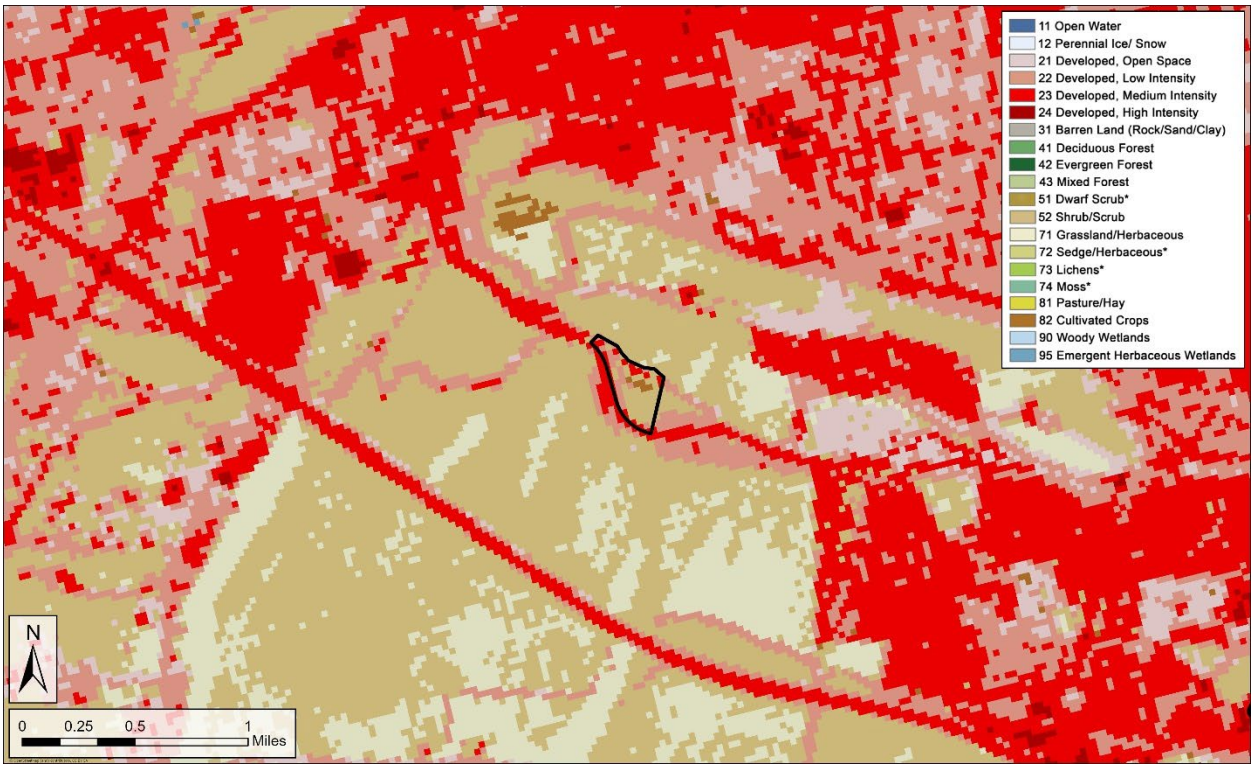


Figure 12. Alternative 2 – Land Cover Map



3.9.2 Environmental Consequences

3.9.2.1 Proposed Action – Alternatives 1A, 1B, and 2

Under Alternatives 1 or 2, constructing and operating the OPC in Tri-Cities at either site would be consistent with the Kennewick zoning designations for each parcel. The use of either site for a medical facility would also be consistent with land uses described in the City of Kennewick Comprehensive Plan (City of Kennewick, 2024). Additionally, the Proposed Action would not restrict land uses or require changes to zoning for properties surrounding either site.

Therefore, the Proposed Action would have no impact on land use.

3.9.2.2 No Action

Under the No Action alternative, there would be no change to existing land use conditions. Therefore, the No Action alternative would result in no impact on land use. The sites could be developed by other parties for other uses in the future.

3.10 Noise and Vibration

3.10.1 Noise

Noise is generally defined as an unwanted sound that interferes with or disrupts normal human activities. Sound is most commonly measured in A-weighted decibels (dBA). Daytime noise levels of 40 dBA are generally perceived as quiet, 60 dBA as moderate, and greater than 70 dBA as loud. The Noise Pollution and Abatement Act of 1972 initiated a federal program of regulating noise pollution with the intent of protecting human health and minimizing annoyance of noise to the public.

Sensitive noise receptors are defined as properties where frequent human use occurs and where a lowered noise level would be of benefit. Hospitals, schools, convalescent facilities, religious institutions, libraries, recreation areas, and residential areas are sensitive receptors, particularly when located within 0.25 miles of the noise source.

3.10.1.1 Construction Noise

Construction noise levels vary depending on the type of equipment being used, the duration of use, and the receptor's distance from the source. Table 6 details the predicted noise levels (at 100 feet from the source) for common construction equipment (FTA, 2018). The sound levels experienced by human receptors would vary depending on distance from the noise source and decrease approximately 6 dBA with every doubling of distance. Common sound levels are shown in Table 7 (OSHA, 2022).

Table 6. Predicted Noise Levels for Construction Equipment

Construction Equipment	Predicted Noise Level at 100 feet (dBA)
Welding generator	65–76
Backhoe	66–87
Roller	67–69
Concrete mixer	67–82
Crane	69–81
Grader/Dozer	74–87
Jackhammer	75–92
Truck	77–88
Paver	80–82

Table 7. Sound Levels for Common Sources

Source	Decibel Level
Silent Study Room	20
North Rim of Grand Canyon	30
Soft Whisper (5 ft. away)	40
Urban Residence	50
Conversation (3 ft. away)	60
Classroom Chatter	70
Freight Train (100 ft. away)	80
Boiler Room	90
Construction Site	90-100
Night Club (with music)	110
Operating Heavy Equipment	120
Jet Taking Off (200 ft. away)	130
Threshold of Pain	140

3.10.1.2 Municipal Noise Ordinances

The City of Kennewick Municipal Code 9.52.060 permits construction noise between the hours of 6:00 a.m. and 8:00 p.m. The city code does not designate weekdays differently from weekends (City of Kennewick, 1987).

3.10.1.3 U.S. Occupational Safety and Health Administration

The U.S. Occupational Safety and Health Administration (OSHA) requires employers to implement a hearing conservation program when noise exposure is at or above 85 dBA averaged over 8 working hours, or above 90 dBA over an 8-hour time-weighted average. The construction contractor would provide hearing protection to all workers who may be exposed to these noise levels.

3.10.2 Vibration

Vibration refers to the oscillatory motion of particles in a medium, often caused by mechanical forces. Vibration decibels (VdB) are used to measure vibration because they correspond well to how humans respond to environmental vibrations. The background vibration velocity level in residential areas is usually 50 VdB or lower and the threshold of perception for humans is approximately 65 VdB. A vibration level of 85 VdB in a residence can result in strong annoyance (FTA, 2018). *Sensitive receptors for vibration are the same as sensitive receptors for noise.*

3.10.3 Affected Environment

3.10.3.1 Proposed Action – Alternatives 1A and 1B

The current soundscape and vibration conditions in the area surrounding the Alternative 1 site are typical of a commercial district. The site is currently vacant and has no noise generating sources. Due to the proximity of the site to US-395, vehicle traffic is the predominant noise source influencing noise conditions at the site. The nearest receptors to the site include the Trios Southridge Hospital located 400 feet to the north and the residential neighborhood located approximately 450 feet to the southwest of the Alternative 1 site.

3.10.3.2 Alternative 2

The current soundscape and vibration conditions in the area surrounding the Alternative 2 site is influenced by vehicle traffic on Bob Olson Highway. The site is currently vacant and has no noise generating sources. The nearest residential receptors to the site are neighborhoods approximately 1,600 feet to the northeast of the Alternative 2 site.

3.10.4 Environmental Consequences

3.10.4.1 Construction Noise – Alternatives 1A, 1B, and 2

Under Alternatives 1 or 2, the Proposed Action construction activities would generate noise from equipment used during site grading and vertical construction. Typical construction equipment involved in the Proposed Action would include excavators, cranes, backhoe-loaders, welders, aerial lifts, graders, pavers/paving equipment, rollers, haul trucks, and concrete mixing trucks. Once mobilized to the site, construction equipment would be operated within the work site not earlier than 6:00 a.m. or later than 8 p.m. in accordance with the Kennewick Municipal Code 9.52.060 (City of Kennewick, 1987).

The private entity would comply with the City of Kennewick noise ordinance and the OSHA worker hearing conservation program.

If necessary, the construction contractor could also implement BMPs such as:

- Using shields or other physical barriers to restrict noise transmission.
- Providing soundproof housings or enclosures for noise producing machinery.
- Using efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified.

- Conducting truck loading, unloading, and hauling operations so that noise is kept to a minimum.
- Selecting material transportation routes as far away from sensitive receptors as possible.
- Shutting down noise-generating heavy equipment when not in use.

The following sections analyze potential noise impacts specific to each Alternative.

3.10.4.1.1 Alternatives 1A and 1B

Given the distance to the nearest residential noise-sensitive receptors, the existing vehicle noise from US-395 and other commercial and residential surroundings, temporary construction noise generated at the site would blend into the urban noise environment and would end after site preparation and exterior construction work is complete. However, multiple concurrent noise-generating construction activities could briefly increase background noise levels. Temporary construction activities generating noise levels of approximately 100 dBA would attenuate to approximately 80 dBA at the nearest residential receptors located approximately 450 feet from the site. The estimated noise level at the receptor location may be lower indoors because building materials (walls, windows, and other barriers) can act as sound-absorbing surfaces. The specific reduction in the indoor noise level has not been estimated for this EA because the variability in specific building construction and materials (e.g. exterior siding, wall insulation, windows, door seals) can influence indoor noise levels (PSU, 2018).

Therefore, construction of the Proposed Action would have a temporary, negligible adverse impact on noise-sensitive receptors adjacent to the site, and temporary, negligible adverse impact on construction personnel working at the site.

3.10.4.1.2 Alternative 2

Given the distance to the nearest residential noise-sensitive receptors, the existing vehicle noise from Bob Olson Parkway and other residential surroundings, temporary construction noise generated at the site would blend into the urban noise environment and would end after site preparation and exterior construction work is complete. However, multiple concurrent noise-generating construction activities could briefly increase background noise levels. Temporary construction activities generating noise levels of approximately 100 dBA would attenuate to approximately 71 dBA at the nearest residential receptors located approximately 1,400 feet from the site. The estimated noise level at the receptor location may be lower indoors because building materials (walls, windows, and other barriers) can act as sound-absorbing surfaces. The specific reduction in the indoor noise level has not been estimated for this EA because the variability in specific building construction and materials (e.g. exterior siding, wall insulation, windows, door seals) can influence indoor noise levels (PSU, 2018).

Therefore, construction of the Proposed Action would have a temporary, negligible adverse impact on noise-sensitive receptors adjacent to the site, and temporary, negligible adverse impact on construction personnel working at the site.

3.10.4.2 Operational Noise – Alternatives 1A, 1B, and 2

Operation of the Proposed Action under Alternative 1 or 2 would create noises and noise levels typical of a medical facility. Noises would be primarily generated from vehicles traveling to and from the OPC from adjacent roads. Noises would also be generated from operating the heating, ventilation, and air conditioning system and monthly testing of the emergency generators. The soundscape at adjacent properties would continue to be dominated by vehicles traveling on adjacent roadways.

Therefore, the operation of the Proposed Action under Alternative 1 and 2 would have a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.3 Vibration

3.10.4.3.1 Proposed Action - Alternatives 1A, 1B, and 2

3.10.4.3.1.1 Construction

The Alternative 1 and 2 sites do not have any existing buildings on them, so there would be no demolition as part of the Proposed Action. Additionally, the OPC is anticipated to be a slab-on-grade construction without requiring pile driving, which can generate vibrations, to shore the ground to support the OPC building.

Therefore, the construction of the Proposed Action would have no impact on vibration-sensitive receptors.

3.10.4.3.1.2 Operation

Under Alternatives 1 or 2, the operation of the Proposed Action has no mechanism to generate vibrations that would extend off-site to affect the surrounding community. Therefore, the operation of the Proposed Action would have no impact on vibration-sensitive receptors.

3.10.4.4 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions. Therefore, the No Action alternative would result in no impact on noise and vibration.

3.11 Solid Waste and Hazardous Materials

Hazardous materials include, but are not limited to, hazardous and toxic substances and waste, and any materials that pose a potential hazard to human health and the environment due to their quantity, concentration, or physical and chemical properties. Hazardous wastes are characterized by their ignitability, corrosivity, reactivity, and toxicity. Hazardous materials and wastes, if not controlled, may either (1) cause or significantly contribute to an increase in mortality, serious irreversible illness, or incapacitating reversible illness; or (2) pose a substantial threat to human health or the environment.

3.11.1 Affected Environment

For each Action Alternative site, VA received a Phase I Environmental Site Assessment (ESA) report performed on behalf of the private entity associated with that site. The Phase I ESA reports were completed in accordance with ASTM E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, and USEPA Standards and Practices for All Appropriate Inquiries contained in 40 CFR Part 312.

3.11.1.1 Proposed Action – Alternatives 1A and 1B

A Phase I ESA was completed at the Alternative 1 site by RSB Environmental in March 2024. The Phase I ESA report stated that the 11.77-acre site consists of vacant land with no existing structures or utility connections. The assessment included historical research, a site inspection, interviews, and a regulatory records review. The findings revealed no evidence of Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), or Historical Recognized Environmental Conditions (HRECs) associated with the site.

The report stated that a riverine (R4SBC) wetland was shown on the USFWS NWI map. However, this classification was based on aerial imagery analysis. Subsequent review of the USFWS NWI does not show this feature. An additional on-site review of the site confirmed no wetland features are present.

The Phase I ESA report showed several underground injection control wells and stormwater permits were identified at nearby properties, but they were not considered RECs.

No significant data gaps were identified, and no additional environmental investigation was recommended at the time of the Phase I ESA report.

3.11.1.2 Proposed Action – Alternative 2

A Phase I ESA was completed at the Alternative 2 site by EFI Global, Inc. in July 2024. The 19.27-acre site consisted of undeveloped land with no structures or utility connections. The assessment included historical research, a site inspection, interviews, and a regulatory records review. The findings revealed no evidence of RECs, CRECs, or HRECs associated with the site. No significant data gaps were identified, and no additional environmental investigation was recommended at the time of the report.

3.11.2 Environmental Consequences

3.11.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.11.2.1.1 Construction

Construction of the Proposed Action at the Alternative 1 or 2 sites would generate material debris and excess soils during land clearing and grading. The private entity would be required to recycle or reuse materials to the maximum extent practicable or dispose of them at USEPA-approved facilities. Only materials that cannot be reused or recycled would be transported off-site for disposal at a landfill approved for construction debris. All soil removed that cannot be reused on site would be transported to an appropriate landfill for reuse as fill or daily cover. The private entity would be responsible for the proper management and disposal of all construction wastes.

Therefore, the construction of the Proposed Action at the Proposed Action Alternative 1 or 2 sites would have a temporary, minor adverse impact on solid waste by temporarily increasing the volume of construction-related debris disposed of at an off-site landfill.

3.11.2.1.2 Operation

Consistent with existing VA OPC operational practices, the OPC would use a variety of small quantities of chemicals for diagnostics and treatments. Hazardous wastes may consist of chemical, low-level radiopharmaceutical, and medical wastes. Janitorial and landscaping maintenance activities include the use of cleaners, solvents, degreasers, and paints. Other non-hazardous materials used during OPC operations include diesel fuel for the emergency generators, lubricants, and oils.

The OPC would not have an on-site solid waste management facility. Solid wastes generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility.

Therefore, the operation of the Proposed Action under Alternatives 1 or 2 would have a permanent, negligible adverse impact on solid waste and hazardous materials associated with routine operation of an OPC.

3.11.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions. Therefore, the No Action alternative would result in no impact on solid waste and hazardous materials.

3.12 Traffic, Transportation, and Parking

Transportation and parking refer to the movement and parking of people, goods, and equipment on a local and regional transportation network, consisting of streets, railroads, transit facilities, bicycle lanes, and other modes of transportation, including walking.

A traffic analysis determines the volume-to-capacity ratio; essentially how close the actual traffic volume at an intersection is to its maximum capacity, allowing planners to identify potential bottlenecks and areas where traffic flow could be significantly impacted. The Critical Lane Volume (CLV) Capacity Analysis Procedure as described in Section 5 of the Highway Capacity Manual, 7th Edition, A Guide for Multi Mobility Analysis (Transportation Research Board, 2022) allows a Level of Service (LOS) to be determined for each intersection. LOS is a quantitative measure used to rank traffic operational conditions along six levels of service designated A through F (Table 8). LOS "A" represents good operating conditions and "F" represents unsatisfactory operating conditions (Transportation Research Board, 2022).

A traffic study informs decision-making by providing a technical framework for assessing the transportation implications of new development projects, ensuring that infrastructure improvements can be planned and implemented proactively to maintain safety, efficiency, and mobility.

Table 8. Level of Service Definitions

LOS Rating	Description of Traffic Conditions	CLV
A	Traffic flows freely, with little or no restrictions to vehicle maneuvers within the traffic stream.	Less than 1,000
B	Reasonably free-flowing conditions, with slight restrictions to vehicle maneuvers within the traffic stream.	1,000-1,150
C	Traffic speed approaches free-flowing conditions, but freedom to maneuver within the traffic stream noticeably restricted.	1,150-1,300
D	Traffic speed begins to reduce, and freedom to maneuver is seriously limited due to a high concentration of traffic.	1,300-1,450
E	Unpredictable traffic flow, with virtually no usable gaps in the traffic stream to accommodate vehicle maneuvers.	1,450-1,600
F	Unstable traffic flow resulting in delays and the formation of queues in locations where traffic demand exceeds roadway capacity.	Greater than 1,600

3.12.1 Affected Environment

3.12.1.1 Proposed Action – Alternatives 1A and 1B

3.12.1.1.1 Existing Transit Conditions

The Alternative 1 site is currently vacant and does not generate any traffic or provide vehicle parking. The site is accessible from Plaza Way, Cleveland Street, Ridgeline Drive, and US-385. Plaza Way is a four-lane collector road serving local commercial and medical facilities, while Cleveland Street provides local access to businesses. Ridgeline Drive connects US-385 and Plaza Way.

Public transportation options are available near the Alternative 1 site, with bus stops on Southridge Boulevard and Plaza Way in proximity to Trios Health Southridge Hospital, approximately 0.25 miles from the site.

Sidewalks and bicycle lanes are present along Plaza Way, Ridgeline Drive, and Cleveland Street.

3.12.1.1.2 Conceptual OPC Development Plan Access Points

Under Alternative 1, the two conceptual OPC development designs differ in the number of access points. Alternative 1A includes two access points: one on Plaza Way and one on Cleveland Street. Alternative 1B includes three access points: two on Plaza Way and one on Cleveland Street. For both Alternative 1A or 1B, the main entrance would be situated along Plaza Way with at least one secondary entrance on Cleveland Street.

3.12.1.1.3 Traffic Impact Analysis

On behalf of VA, a planning-level traffic impact analysis (TIA) was performed to assess the existing transportation conditions surrounding the Alternative 1 site and to estimate potential future traffic impacts on the LOS with and without the Proposed Action by the year 2044.

On Tuesday, December 3, 2024, intersection turning movement counts were conducted at two intersections: (1) Plaza Way & Cleveland Street/Hospital Access and (2) Plaza Way & Ridgeline Drive (roundabout) (these intersections are depicted on Figure 13). Traffic data was collected during peak periods from 6–9 a.m. and 3–7 p.m.

The TIA found that both study intersections currently operate at an optimal LOS "A" for both a.m. and p.m. peak hours (Table 9); LOS “A” indicates that traffic flows freely, with little or no restrictions to vehicle maneuvers within the traffic stream.

Table 9. Alternative 1 – Year 2024 LOS at the Traffic Impact Analysis Intersections

Intersection ID	Intersection	2024 LOS (a.m.)	2024 LOS (p.m.)
1	Plaza Way and Cleveland Street	A	A
2	Plaza Way and Ridgeline Drive	A	A

3.12.1.2 Alternative 2

3.12.1.2.1 Existing Transit Conditions

The Alternative 2 site is currently vacant and does not generate any traffic or provide vehicle parking. The site is accessible from Bob Olson Parkway. located at 8428 Bob Olson Parkway, Kennewick, Benton County, WA. Bob Olson Parkway is a five-lane regional road that was constructed in 2017. It runs from Steptoe Street and the 10th Avenue roundabout at its north end to Sherman Street in the south. This route connects US-395 via Hildebrand Boulevard to the south and State Route 240 via West Clearwater Avenue at its north end. It serves local residential uses and has a posted speed limit of 45 mph in the study area.

There are no public transit services available in the study area.

Sidewalks and bicycle lanes are available on both sides of Bob Olson Parkway.

3.12.1.2.2 Conceptual OPC Development Plan Access Points

The conceptual design for the proposed OPC includes two access points along Bob Olson Parkway. The main entrance and exit access point would be located near the southern portion of the OPC parking lot, while the secondary access point would be approximately 500 feet to the north of the main access point.

3.12.1.2.3 Traffic Impact Analysis

On behalf of VA, a traffic impact analysis was performed to assess the existing transportation conditions surrounding the Alternative 2 site and to estimate potential future traffic impacts on the LOS with and without the Proposed Action by the year 2044.

On Tuesday, December 3, 2024, traffic movement counts were conducted at the two proposed access points on Bob Olson Parkway (depicted on Figure 14). Traffic data was collected during peak periods from 6–9 a.m. and 3–7 p.m. Because there are no existing intersections on Bob Olson Parkway near the proposed access points under Alternative 2, the TIA did not include intersection capacity analyses for current existing conditions.

3.12.1.2.3.1 2044 Background Conditions without the Proposed OPC

The 2044 background conditions were projected using a 2% annual traffic growth rate, based on historical data and anticipated regional development. The analysis assumed no additional development associated with the OPC.

Because the site access points do not currently exist, no intersection capacity analyses were performed for 2044 baseline traffic conditions without the OPC.

3.12.1.2.3.2 2044 Conditions with the Proposed OPC

TTG estimated the OPC, based on having approximately 750 parking spaces, would have approximately 3,000 trips per day, which would generate approximately 300 trips occurring during peak hours.

TTG added the estimated OPC-generated traffic to the projected 2044 background traffic conditions and found that the proposed OPC would not degrade traffic operations. The projected LOS at the study intersections in 2044 remains at LOS "A," indicating free-flowing traffic conditions.

Additionally, TTG evaluated the CLV capacity analysis results and found that the percentage increase in CLV between the 2044 no-build and build scenarios is minimal, with projected increases of 1-2% in peak hours. VA considers a CLV increase of 20% or less to be a less-than-significant impact.

Because no significant impacts were identified, TTG did not recommend transportation improvements or mitigation measures. The study concluded that Bob Olson Parkway and the proposed site access points would operate at an acceptable LOS through 2044, even with the addition of OPC-generated traffic.

3.12.2 Environmental Consequences

3.12.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.12.2.1.1 Construction

Under Alternatives 1 or 2, construction activities would be conducted over approximately 18-24 months and involve the removal of construction and demolition debris, the delivery of construction materials and equipment, worker commuting, and the removal of equipment after construction concludes. To minimize the impact on traffic flow on area roadways, delivery and removal activities would be periodic and would generally be scheduled to occur outside of peak commuting periods. Construction worker travel would recur daily and may coincide with peak commuting periods. While worker trips would recur during the peak commuting periods, some of these trips would likely involve carpooling and/or transit, thus limiting impact on traffic.

The private entity would be responsible for obtaining the City of Kennewick Public Works permits, including the Road Approach and Right-of-way Encroachment permits, required to construct driveways, curb cuts, or other modifications to roadways or rights-of-way.

Therefore, under Alternatives 1 or 2, the construction of the Proposed Action would have a temporary, negligible adverse impact on traffic conditions.

Figure 13. Alternative 1 – Traffic Impact Analysis Intersections

Figure 14. Alternative 2 – Traffic Impact Analysis Intersections

3.12.2.2 Proposed Action – Alternatives 1A and 1B

3.12.2.2.1 Operation

The planning-level TIA used a model to project how operating the OPC under Alternative 1 could impact traffic conditions at the Alternative 1 study intersections by the year 2044 (TTG, 2025a). This analysis assumed a 1% annual baseline increase in traffic volume, and then incorporated the additional traffic expected from the operation of the Proposed Action over the same period. The data were utilized to evaluate the future impact of the Proposed Action under Alternative 1 on the CLV and LOS at the study intersections by the year 2044.

As shown in Table 9, during operation of the Proposed Action under Alternative 1A or 1B, the intersection at Plaza Way and Cleveland Street is projected to have a future LOS "A" and CLV increase of less than 20%. The intersection of Plaza Way and Ridgeline Drive is projected to have a future LOS "B" although the CLV increases would be greater than 20% in both peak hours. However, an LOS "B" is acceptable and shows that additional traffic generated by operating the OPC would not cause significant congestion or delays.

Therefore, the operation of the Proposed Action under Alternative 1 would have a permanent, negligible adverse impact on traffic conditions.

Table 10. Alternative 1 – 2044 Traffic Impact Analysis Summary for the Study Intersections

ID	Intersection	No-Build Scenario, 2044 (Without the OPC)				Future Build Scenario, 2044 (With the OPC)					
		2044 – a.m.		2044 – p.m.		2044 – a.m.			2044 – p.m.		
		LOS	CLV	LOS	CLV	LOS	CLV	% CLV change	LOS	CLV	% CLV change
1	Plaza Way and Cleveland Street	A	330	A	340	A	378	15%	A	403	19%
2	Plaza Way and Ridgeline Drive	A	821	A	798	B	1,072	31%	B	1,014	27%

3.12.2.3 Proposed Action – Alternative 2

3.12.2.3.1 Operation

The planning-level TIA used a model to project how operating the OPC under Alternative 2 could impact traffic conditions at the Alternative 2 study intersections by the year 2044 (TTG, 2025b). This analysis assumed a 2% annual baseline increase in traffic volume, and then incorporated the additional traffic expected from the operation of the Proposed Action. The data were utilized to evaluate the future impact of the Proposed Action on the CLV and LOS at the study intersections by the year 2044. The TIA showed that under Alternative 2, both intersections along Bob Olson Highway are projected to operate at LOS "A".

Therefore, the operation of the Proposed Action under Alternative 2 would have no impact on traffic conditions.

3.12.2.4 No Action Alternative

Under the No Action Alternative, no transportation impacts associated with the Proposed Action would occur.

3.13 Utilities

Utilities are the services that support the efficient and comfortable operation of a facility or location. Utilities include potable water, sanitary sewerage, electricity, telecommunications, and stormwater management.

3.13.1 Affected Environment

3.13.1.1 Proposed Action – Alternatives 1A, 1B, and 2

Core utilities including water, sewer, natural gas, and electric are available from the following regional utility providers at both of the Action Alternative sites:

- **Potable water:** Kennewick Utility Services Division of Public Works
- **Sanitary waste treatment:** Kennewick Utility Services Division of Public Works
- **Electric:** Benton Public Utility District
- **Natural gas:** Cascade Natural Gas
- **Stormwater:** Kennewick Utility Services Division of Public Works

3.13.2 Environmental Consequences

3.13.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.13.2.1.1 Construction

Under Alternatives 1 or 2, the private entity would be responsible for connecting the new OPC to utility infrastructure for potable water, sewerage, electricity, and telecommunication services. The private entity would be required to confirm and verify with utility providers that capacities are available to meet the projected demands for the OPC. The private entity would also be required to apply for and obtain permits required to connect to and utilize utility services, and to perform construction in a right-of-way.

The construction process would require excavating utility corridors needed to extend laterals from existing mains. Prior to construction, the private entity would coordinate with the utility providers to ensure that constructing new laterals and connecting to mains does not interrupt utility services to current customers in the community. Under Alternatives 1 or 2, stormwater generated on-site would be managed in the newly constructed on-site stormwater management systems and would not be discharged to the municipal stormwater system.

Therefore, the construction of the Proposed Action under Alternatives 1 or 2 would have a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way, and no impact on the quality of utility service delivery to existing customers in the surrounding community.

3.13.2.1.2 Operation

Under Alternatives 1 or 2, the Proposed Action operational use of utilities would be comparable to other OPCs, which has not resulted in impacts to the quality of service to other utility customers. Additionally, the private entity would be responsible for designing the OPC to achieve Green Globes certification, which seeks to reduce energy and utility consumption through sustainable design practices. The operation of the Proposed Action would not require impacts to utility infrastructure in the surrounding community.

Therefore, the operation of the Proposed Action would have a permanent, negligible adverse impact on utility usage due to standard consumption rates for an OPC.

3.13.2.2 No Action Alternative

Under the No Action alternative, no changes to utility consumption would occur. Therefore, the No Action alternative would result in no impact on any utility infrastructure or increase in use.

3.14 Community Services

Community services include police, fire, ambulance, and emergency services provided by VA or surrounding communities.

3.14.1 Affected Environment

3.14.1.1 Proposed Action – Alternatives 1A, 1B, and 2

Benton County, Washington has a population of approximately 215,219 people, of which 11,512 (7.2%) are Veterans (U.S. Census Bureau, 2023). This is similar to the statewide Veteran population rate of 7.6%. Veteran health care is available from the VA Walla Walla Health Care System, which offers a wide range of health, support, and facility services throughout Washington, including the Richland CBOC in Richland, WA which serves Veterans in the Kennewick area and surrounding parts of Benton County. Other major public hospitals near Kennewick include Trios Southridge Hospital in Kennewick, WA; Kadlec Regional Medical Center in Richland, WA: and Lourdes Medical Center in Pasco, WA.

Public safety services in Kennewick are provided by the Kennewick Police Department, which manages patrol, investigations, administration, and community programs. Fire and emergency/rescue services are provided by the Kennewick Fire Department, operating from five fire stations throughout the city. The department delivers fire suppression, emergency medical services (including basic life support and advanced life support), hazardous materials response, technical rescue, and fire prevention programs.

3.14.2 Environmental Consequences

3.14.2.1 Proposed Action – Alternatives 1A, 1B, and 2

Under Alternatives 1 or 2, constructing and operating the Proposed Action would not induce or require changes in non-Veteran community services, such as force protection or security services. Based on community impacts analyzed under similar prior VA OPC projects, the Proposed Action would not increase needs for housing, social, or emergency services in the surrounding community. The increase in available jobs associated with the construction or operation of the Proposed Action would not result in an increase in the population of families with children such that it would cause increased enrollment at local schools.

The Proposed Action would help to address space gaps and operational inefficiencies at existing clinics within the VA Walla Walla Health Care System and ensure Veterans have continued access to high-quality, VA-operated outpatient care.

Therefore, by increasing Veterans' access to quality health care, operation of the Proposed Action would result in a permanent, beneficial impact on community services related to health care for Veterans in the Tri-Cities region. There would be no impact on other local community services.

3.14.2.2 No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented and there would be no increase in capacity of VA-provided health care services. Therefore, the No Action alternative would have a permanent, adverse impact on health care services that VA is able to provide to Veterans in the Tri-Cities region.

3.15 Socioeconomics

Socioeconomics refers to the social and economic conditions in the communities surrounding the Proposed Action. The following subsections identify and describe the socioeconomic environment of Benton County and the State of Washington. The data provides an understanding of the socioeconomic factors that have developed the area. Socioeconomic areas of discussion include the local demographics of the area, as well as the regional and local economy.

3.15.1 Affected Environment

3.15.1.1 Proposed Action – Alternatives 1A, 1B, and 2

Benton County is in the south-central region of WA and is part of the Tri-Cities metropolitan area, which includes Kennewick and Richland, WA (WAESD, 2025). The city of Prosser is the Benton County seat. Kennewick is the largest city in Benton County. The county covers approximately 1,760 square miles, including 60 square miles of water, and features a mix of agricultural land and rolling prairie-like terrain. Benton County accounts for approximately 3% of WA's population. Major industries in Benton County include health care and social assistance; retail trade; professional, scientific, and technical services; government; administrative; and waste management services. Benton County's economy has been influenced by federal research and development activities (including the Hanford Military Site), agriculture (including wine production), food processing, and manufacturing. In 2023, Benton County supported approximately 97,832 jobs, with total wages of approximately $6.55 billion. The unemployment rate was approximately 4.5-5% in 2025 (WAESD, 2025).

Benton County and WA have similar population percentages across different demographic categories, including minority populations, age groups, high school graduate, and Veterans (U.S. Census Bureau, 2023) (Table 11).

Table 11. Demographic Data for Benton County and the State of Washington

Area	Population	Population under 18 years of age	Population over 65 years of age	Minority % (reporting other than white along)	High School graduates %	Veterans
Benton County	215,219	25.9% (55,819)	16.2% (34,750)	33.1% (71,237)	88.4% (190,254)	7.2% (11,512)
WA	7.8M	21.1% (1.6M)	17.1% (1.3M)	34.8% (2.7M)	92.4% (7.2M)	7.6% (465,141)

3.15.1.2 Income, Poverty, and Employment

Benton County has a slightly higher median household income and slightly higher percentage of population below the poverty line than the State of Washington (U.S. Census Bureau, 2023).

Table 12. Regional and State Employment and Income

Area	Number of households	Median Household Income	Population Below Poverty Level	Unemployment Rate
Benton County	78,748	$82,304	11% (25,387)	3.1% (5,090)
Washington	3.1M	$73,311	10.3% (794,426)	2.9% (182,384)

3.15.2 Environmental Consequences

3.15.2.1 Proposed Action – Alternatives 1A, 1B, and 2

3.15.2.1.1 Construction

Under Alternative 1 or 2, construction of the Proposed Action would involve the temporary employment of skilled and non-skilled laborers, and construction materials and supplies could be purchased from local and regional vendors. There could also be an increase in incidental spending by construction workers on food, lodging, products, and services during the construction phase. The amount of spending is anticipated to represent a negligible increase in the overall economic activity in Kennewick or Benton County, WA.

Therefore, the construction of the Proposed Action under Alternatives 1 or 2 would have a temporary, negligible beneficial impact on socioeconomic conditions in Kennewick or Benton County, WA.

3.15.2.1.2 Operation

The VA Walla Walla Health Care System would administer and staff the new OPC, with approximately 231 new staff anticipated. Once the new OPC is operational, VA would close the existing Richland VA CBOC at 825 Jadwin Avenue, Richland, WA, and relocate the services and supporting staff to the new OPC. The OPC staff and visitors could make incidental purchases from businesses in the surrounding community. The amount of spending is anticipated to represent a negligible increase in the overall economic activity in Kennewick or Benton County, WA.

Therefore, the operation of the Proposed Action under Alternative 1 or 2 would result in a permanent, negligible beneficial impact on socioeconomic conditions in Kennewick and Benton County.

3.15.2.2 No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented. There would be no change to existing conditions at either site and socioeconomic conditions would remain unchanged.

Therefore, the No Action alternative would result in no impact on socioeconomic conditions in Kennewick, Benton County, or the state of Washington.

3.16 Potential for Generating Substantial Public Controversy

VA has solicited input on the Proposed Action from the public, several federal, state, and local government agencies, and tribes with interest in Benton County. The Proposed Action is anticipated to receive strong community support for improving Veterans' timely access to modern, state-of-the-art health care services in The Tri-Cities area. See Appendix C for all regulatory agency correspondence and Appendix D for a record of all public engagement activities.

Therefore, the Proposed Action is not anticipated to generate substantial public controversy.

4.0 MINIMIZATION AND AVOIDANCE MEASURES

This section summarizes the measures identified throughout Section 3 that are proposed to avoid or minimize potential adverse impacts of the Proposed Action (Table 13). Implementation of the measures identified in Section 3.0 by the private entity would maintain potential impacts at less than significant adverse levels for all resources, but do not imply that impacts would in all or any cases be significant without these measures. For resources not listed, no specific measures beyond construction BMPs or compliance with VA's standard operating procedures have been identified.

Table 13. Measures Incorporated into the Proposed Action to Minimize or Avoid Potential Adverse Impacts

Resource Area	Alternative 1 and 2: Minimization, Avoidance, and Protection 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 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.
Wetlands	The private entity would ensure that the final design plan for the OPC development avoids any permanent impacts to the approximately 0.012-acre wetland depression located within the property parcel boundary but outside of the proposed OPC development footprint. No development activities would occur within approximately 300 feet of the delineated wetland, and no development would occur within the Amon Wasteway's AP Lateral Drain.
Geology and Soils	The private entity would design and construct all buildings to meet or exceed federal, state, and local seismic codes. The private entity would be required to apply for and obtain coverage under the Washington State Department of Ecology Construction Stormwater General Permit (WADOE, 2024). To manage soil erosion during construction, the private entity would be responsible for implementing and maintaining the BMPs specified in the *2024 Stormwater Management Manual for Eastern Washington* (WADOE, 2024). The private entity would also implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impact of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality. Releases of regulated quantities of petroleum-based fluids would be reported to VA and WADOE and cleaned up per state regulatory requirements.

Resource Area	Alternative 1 and 2: Minimization, Avoidance, and Protection Measures
Hydrology and Water Quality	To minimize potential impacts on hydrology and water quality during construction, the private entity would obtain the WADOE Construction Stormwater General Permit and implement and maintain permit-required BMPs, such as bioretention areas, vegetated swales, and retention basins, would be implemented and maintained. Additionally, the private entity would establish a Spill Prevention, Control, and Countermeasure plan and train workers on how to respond to accidental releases of petroleum-based fluids to prevent impacts to groundwater during the construction phase.
Land Use	The private entity would be required to apply for and obtain necessary state or local land use development permits required prior to beginning any land alteration activities.
Noise and Vibration	The private entity would operate construction equipment within the work site not earlier than 6:00 a.m. or later than 8 p.m. in accordance with the Kennewick Municipal Code 9.52.060 (City of Kennewick, 1987). The private entity would comply with the City of Kennewick noise ordinance and the OSHA worker hearing conservation program.
Solid Waste and Hazardous Materials	The private entity would be required to recycle or reuse materials to the maximum extent practicable or dispose of them at USEPA-approved facilities. Only materials that cannot be reused or recycled would be transported off-site for disposal at a landfill approved for construction debris. All soil removed that cannot be reused on site would be transported to an appropriate landfill for reuse as fill or daily cover. The private entity would be responsible for the proper management and disposal of all construction wastes.
Traffic, Transportation, and Parking	The private entity would be responsible for obtaining the City of Kennewick Public Works permits, including the Road Approach and Right-of-way Encroachment permits, required to construct driveways, curb cuts, or other modifications to roadways or rights-of-way.
Utilities	The private entity would coordinate with utility providers to confirm, apply for, and obtain any permits and approvals to access rights-of-way crossings needed to install utilities and to connect and utilize utility services. The construction of utility infrastructure would then require initial site preparation to establish utility corridors. The private entity would continue to coordinate with utility providers to ensure there are no service interruptions to existing customers in the community.

5.0 PUBLIC PARTICIPATION, COORDINATION, AND CONSULTATION

5.1 Public Involvement

VA initiated the public scoping process for the Proposed Action with publication of a notice in the *Tri-City Herald* announcing the opportunity to provide early input on the Proposed Action. The notice was published on December 22 and 25, 2024. The scoping notice was also published on the VA website at: www.cfm.va.gov/environmental/. No comments were received in response to the scoping notice. Appendix E contains all public engagement materials.

VA is publishing this Draft EA for a 30-day public review and comment period. A notice of availability (NOA) of the Draft EA is being posted in the *Tri-City Herald*. The NOA explains how to obtain the Draft EA electronically from the VA website at http://www.cfm.va.gov/environmental and in print at the Mid-Columbia Libraries - Kennewick Branch, 1620 S Union St, Kennewick, WA 99338. Comments on the Draft EA are to be sent to vacoenvironment@va.gov with the subject line "Tri-Cities OPC". VA will finalize the EA based on relevant public and stakeholder input and determine whether a Finding of No Significant Impact ("FONSI") is appropriate or if further analysis in an Environmental Impact Statement ("EIS") is required.

5.2 Consultation and Stakeholder Coordination

5.2.1 Consultation

On September 2, 2025, VA initiated Section 106 consultation with the Washington State Department of Archeology and Historic Preservation, Benton County Planning Division, Kennewick Historic Preservation Commission, Kennewick Certified Local Government, and the four federally recognized Indian tribes with interests in Benton County, WA: Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, and the Nez Perce Tribe. See Section 3.6.1.1.1 for more information and Appendix C for copies of all Section 106 correspondence.

5.2.2 Stakeholder Coordination

VA electronically sent stakeholders scoping notification letters to the entities listed below. VA addressed substantive scoping responses in this EA. Appendix E contains copies of the scoping correspondence.

5.2.3 Federal Agencies

- U.S. Environmental Protection Agency - Region 10
- USDA Natural Resources Conservation Service, Prosser Service Center

5.2.4 State Agencies

- Washington Department of Ecology
- Washington State Department of Transportation
- Washington Department of Archaeology and Historic Preservation
- Washington State Department of Veterans Affairs

5.2.5 City and County Agencies

- Mayor Gretl Crawford, City of Kennewick

- Benton County Commissioner, District 2
- Kennewick Certified Local Government

5.2.6 Federally Recognized Indian Tribes with Interests in Benton County

- Confederated Tribes and Bands of the Yakama Nation
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of the Warm Springs Reservation of Oregon
- Nez Perce Tribe

5.2.7 Environmental Organizations in Benton County, WA

- Lower Columbia Basin Audubon Society
- Benton Conservation District

5.2.8 Veteran Organizations in Benton County, WA

- Kennewick VFW Post 5785
- Columbia Basin Veterans Center, Benton and Franklin Counties Veteran Service

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