DRAFT
ENVIRONMENTAL ASSESSMENT

Proposed Construction and Operation of an Outpatient Clinic
Salt Lake City, Utah

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

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

Proposed Action 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 Salt Lake City, UT. VA is considering offers received from four private entities, each of which provided a conceptual plan to construct an OPC at one of four potential sites. This EA identifies each potential site and its corresponding conceptual plan as Alternative 1, 2, 3, and 4. VA would select only one of the four Alternatives for the OPC. This EA examines Alternatives 1, 2, 3, and 4, and the No Action alternative in depth. These alternatives are described below.

Action Alternatives

Under Alternative 1, 2, 3, or 4, 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 (GBI 2025). The OPC would be operated and staffed by the Salt Lake City VA Health Care System, with approximately 128 new staff anticipated.

Details unique to Alternatives 1, 2, 3, and 4 are described below:

Alternative 1: The site is located at 2191 South 300 West, South Salt Lake, UT, which is approximately 7 acres of developed land in a commercial area. The proposed OPC main entrance and ambulance/service entrance would be constructed on South 300 West. The proposed OPC would be approximately 113,862 square feet and include a parking garage with approximately 600 parking spaces.

Alternative 2: The site is located at 3300 South 1300 East, Millcreek, UT, which is approximately 6 acres of developed land in a commercial area. The proposed OPC main entrance would be on Utopia Drive, with a dedicated ambulance/service entrance on South 1300 East. The proposed OPC would be approximately 113,862 square feet and include a parking garage with approximately 600 parking spaces.

Alternative 3: The site is located at 3711 South State Street, South Salt Lake, UT, which is approximately 8.4 acres of developed land in a commercial area. The proposed OPC main entrance and

ambulance/service entrance would be constructed on State Street. The proposed OPC would be approximately 112,595 square feet and include a parking garage with approximately 600 parking spaces.

Alternative 4: The site is located at 2300 South 300 West, South Salt Lake, UT, which is approximately 4.4 acres of developed land in a commercial area. The proposed OPC main entrance and ambulance/service entrance would be constructed on South 300 West. The proposed OPC would be approximately 112,362 square feet and include a parking garage with approximately 600 parking spaces.

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. VA would continue to provide primary, mental health, and specialty care outpatient services at the existing VA clinics operated by the VA Salt Lake City Health Care System. The VA clinics would continue to have space gaps and operational inefficiencies, thus limiting VA's ability to provide modern, state-of-the-art health care services to Veterans in the region and would not meet the purpose of or need for the Proposed Action. The No Action alternative would not meet the purpose and need for the Proposed Action. The proposed sites for the Salt Lake City 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 1, 2, 3, or 4 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 and Minimization and Avoidance Measures

Resource	Alternative 1 (2191 South 300 West, South Salt Lake)	Alternative 2 (3300 South 1300 East, Millcreek)	Alternative 3 (3711 South State St., South Salt Lake)	Alternative 4 (2300 South 300 West, South Salt Lake)	No Action Alternative
Aesthetics	**Construction**: Active construction site for approximately 18-24 months. Temporary, negligible adverse impact on aesthetics due to presence of construction equipment and site clearing. **Operation**: Permanent, negligible beneficial impact on aesthetics from conversion of developed land to an active medical facility with a professionally maintained landscape.	**Construction**: Active construction site for approximately 18-24 months. Temporary, negligible adverse impact on aesthetics due to presence of construction equipment and site clearing. **Operation**: Permanent, negligible beneficial impact on aesthetics from conversion of developed land to an active medical facility with a professionally maintained landscape.	**Construction**: Active construction site for approximately 18-24 months. Temporary, negligible adverse impact on aesthetics due to presence of construction equipment and site clearing. **Operation**: Permanent, negligible beneficial impact on aesthetics from conversion of developed land to an active medical facility with a professionally maintained landscape.	**Construction**: Active construction site for approximately 18-24 months. Temporary, negligible adverse impact on aesthetics due to presence of construction equipment and site clearing. **Operation**: Permanent, negligible beneficial impact on aesthetics from conversion of developed land to an active medical facility with a professionally maintained landscape.	No impact
Air Quality	**Construction**: Permit-regulated dust from grading, criteria pollutant and greenhouse gas emissions from construction equipment and vehicles. Temporary, negligible adverse impact on air quality. **Operation**: Emissions from heating, ventilation, and air conditioning (HVAC), emergency generator testing, and vehicles, resulting in permanent, negligible adverse impact on air quality. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification.	**Construction**: Permit-regulated dust from grading, criteria pollutant and greenhouse gas emissions from construction equipment and vehicles. Temporary, negligible adverse impact on air quality. **Operation**: Emissions from HVAC, emergency generator testing, and vehicles, resulting in permanent, negligible adverse impact on air quality. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification.	**Construction**: Permit-regulated dust from grading, criteria pollutant and greenhouse gas emissions from construction equipment and vehicles. Temporary, negligible adverse impact on air quality. **Operation**: Emissions from HVAC, emergency generator testing, and vehicles, resulting in permanent, negligible adverse impact on air quality. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification.	**Construction**: Permit-regulated dust from grading, criteria pollutant and greenhouse gas emissions from construction equipment and vehicles. Temporary, negligible adverse impact on air quality. **Operation**: Emissions from HVAC, emergency generator testing, and vehicles, resulting in permanent, negligible adverse impact on air quality. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification.	No impact
Wildlife and Habitat	**Construction**: Site contains no suitable habitat for federal or state-listed species, due to the absence of any natural undeveloped areas. No impact on wildlife or habitat. **Operation**: No impact on wildlife or habitat.	**Construction**: The conceptual site development plan shows that the Proposed Action would not impact the existing trees that are off-site but adjacent to the on-site paved access road on the western portion of the site. The few on-site, sparse trees may provide limited habitat for common wildlife species but are not critical habitat or habitat for listed species. These on-site trees would be removed during site clearing. Therefore, construction of the Proposed Action would have a permanent, negligible impact on wildlife and habitat. **Operation**: No impact on wildlife or habitat.	**Construction**: The conceptual site development plan shows that the Proposed Action would remove approximately 0.5 acres of vegetation from the northern portion of the site and approximately 1 acre of trees from the southern portion of the site. These isolated vegetated areas may provide limited habitat for common wildlife species, but do not provide habitat for listed species. Therefore, construction of the Proposed Action would have a permanent, negligible impact on wildlife and habitat. **Operation**: No impact on wildlife or habitat.	**Construction**: Site contains no suitable habitat for federal or state-listed species, due to the absence of any natural undeveloped areas. No impact on wildlife or habitat. **Operation**: No impact on wildlife or habitat.	No impact

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Floodplains, Wetlands, and Coastal Zone	**Floodplains**: The site is located entirely in Zone X, the 500-year floodplain. The conceptual plan indicates development within the 500-year floodplain. There are no applicable floodplain ordinances for development in a 500-year floodplain. **Wetlands**: Site contains no wetlands. No impact on wetlands. **Coastal Zone**: Site is not in a coastal zone. No impact on coastal zone resources.	**Floodplains**: Site is outside the 100-year and 500-year floodplain. No impact on floodplains. **Wetlands**: Site contains no wetlands. No impact on wetlands. **Coastal Zone**: Site is not in a coastal zone. No impact on coastal zone resources.	**Floodplains**: Site is outside the 100-year and 500-year floodplain. No impact on floodplains. **Wetlands**: Site contains no wetlands. No impact on wetlands. **Coastal Zone**: Site is not in a coastal zone. No impact on coastal zone resources.	**Floodplains**: The site is located entirely in Zone X, the 500-year floodplain. The conceptual plan indicates development within the 500-year floodplain. There are no applicable floodplain ordinances for development in a 500-year floodplain. **Wetlands**: Site contains no wetlands. No impact on wetlands. **Coastal Zone**: Site is not in a coastal zone. No impact on coastal zone resources.	No impact
Cultural Resources and Historic Properties	**Construction and Operation:** An Initial Cultural Resources Impact Prediction (ICRIP) report and a Phase I archaeology investigation identified one property eligible for the National Register of Historic Places (NRHP) in the Area of Potential Effects (APE); the previously recorded archaeological site: Denver & Rio Grande Western Railway (42SL416), which has previously been determined eligible in the NRHP under Criterion A. This eligible property would not be impacted by the Proposed Action. VA found the Proposed Action/undertaking would have no adverse effect to the historic site, pursuant to 36 CFR 800.5(b). On June 10, 2025, VA initiated Section 106 consultation with the Utah (UT) State Historic Preservation Office (SHPO); Northwestern Band of the Shoshone Nation; Shoshone-Bannock Tribes of the Fort Hall Reservation; Ute Indian Tribe of the Uintah & Ouray Reservation; South Salt Lake City Planning Commission; and Utah Historical Society. On June 18, 2025, the UT SHPO provided written Section 106 concurrence of no adverse effect to the historic site.	**Construction and Operation:** An ICRIP report and a Phase I archaeology investigation identified two non-eligible archaeological properties; 42SL214 and 42SL1106. The segment of Jordan & Salt Lake City Canal (42SL214) within the APE has been piped and buried and is no longer extant in its original state as a canal. Due to a lack of post-contact period remains and expressions, 42SL214 lacks all aspects of integrity and is therefore recommended non-contributing to the site's overall eligibility. The newly documented archaeological site consists of a segment of an unnamed, secondary canal (42SL1106) and is recommended not eligible for listing in the NRHP. VA found the Proposed Action/undertaking would result in no historic properties affected, pursuant to 36 CFR 800.4(d)(1). On June 10, 2025, VA initiated Section 106 consultation with the UT SHPO; Northwestern Band of the Shoshone Nation; Shoshone-Bannock Tribes of the Fort Hall Reservation; Ute Indian Tribe of the Uintah & Ouray Reservation; Millcreek Planning Commission; Millcreek Historic Preservation Commission; and Utah Historical Society. On June 17, 2025, the UT SHPO provided written Section 106 concurrence of no effects to historic properties.	**Construction and Operation:** An ICRIP report and a Phase I archaeology investigation did not identify any NRHP-listed or eligible historic properties, archaeological sites, or isolated finds. VA found the Proposed Action/undertaking would result in no historic properties affected, pursuant to 36 CFR 800.4(d)(1). On June 10, 2025, VA initiated Section 106 consultation with the UT SHPO; Northwestern Band of the Shoshone Nation; Shoshone-Bannock Tribes of the Fort Hall Reservation; Ute Indian Tribe of the Uintah & Ouray Reservation; South Salt Lake City Planning Commission; and Utah Historical Society. On June 17, 2025, the UT SHPO provided written Section 106 concurrence of no effects to historic properties.	**Construction and Operation:** An ICRIP report and a Phase I archaeology investigation did not identify any NRHP-listed or eligible historic properties, archaeological sites, or isolated finds. VA found the Proposed Action/undertaking would result in no historic properties affected, pursuant to 36 CFR 800.4(d)(1). On June 10, 2025, VA initiated Section 106 consultation with the UT SHPO; Northwestern Band of the Shoshone Nation; Shoshone-Bannock Tribes of the Fort Hall Reservation; Ute Indian Tribe of the Uintah & Ouray Reservation; South Salt Lake City Planning Commission; and Utah Historical Society. On June 17, 2025, the UT SHPO provided written Section 106 concurrence of no effects to historic properties.	No impact

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Geology and Soils	**Geology**: Building foundation not anticipated to encounter bedrock, as construction would not require excavation to a sufficient depth where geological resources would be affected. The private entity would design and construct the OPC development according to applicable seismic design requirements per VA, International Building Code, and Greater Salt Lake Municipal Services District criteria. No impact on geology during construction or operation. **Soil**: Prior to construction, the private entity would obtain Utah Department of Environmental Quality (UT DEQ) Utah Pollutant Discharge Elimination System (UPDES) General Construction Stormwater Permit. Soil erosion and sedimentation are minimized by implementing and maintaining the UPDES permit-required BMP specified in Best Management Practices for Construction Sites. Construction would result in temporary, minor adverse impact on soil quality. No impact to prime farmland soil. No mechanisms to further impact soil or cause erosion during operation of the OPC. No impact on soil quality.	**Geology**: Building foundation not anticipated to encounter bedrock, as construction would not require excavation to a sufficient depth where geological resources would be affected. The private entity would design and construct the OPC development according to applicable seismic design requirements per VA, International Building Code, and Greater Salt Lake Municipal Services District criteria. No impact on geology during construction or operation. **Soil**: Prior to construction, the private entity would obtain a UT DEQ UPDES General Construction Stormwater Permit. Soil erosion and sedimentation are minimized by implementing and maintaining the UPDES permit-required BMP specified in Best Management Practices for Construction Sites. Construction would result in temporary, minor adverse impact on soil quality. No impact to prime farmland soil. No mechanisms to further impact soil or cause erosion during operation of the OPC. No impact on soil quality.	**Geology**: Building foundation not anticipated to encounter bedrock, as construction would not require excavation to a sufficient depth where geological resources would be affected. The private entity would design and construct the OPC development according to applicable seismic design requirements per VA, International Building Code, and Greater Salt Lake Municipal Services District criteria. No impact on geology during construction or operation. **Soil**: Prior to construction, the private entity would obtain a UT DEQ UPDES General Construction Stormwater Permit. Soil erosion and sedimentation are minimized by implementing and maintaining the UPDES permit-required BMP specified in Best Management Practices for Construction Sites. Construction would result in temporary, minor adverse impact on soil quality. No impact to prime farmland soil. No mechanisms to further impact soil or cause erosion during operation of the OPC. No impact on soil quality.	**Geology**: Building foundation not anticipated to encounter bedrock, as construction would not require excavation to a sufficient depth where geological resources would be affected. The private entity would design and construct the OPC development according to applicable seismic design requirements per VA, International Building Code, and Greater Salt Lake Municipal Services District criteria. No impact on geology during construction or operation. **Soil**: Prior to construction, the private entity would obtain a UT DEQ UPDES General Construction Stormwater Permit. Soil erosion and sedimentation are minimized by implementing and maintaining the UPDES permit-required BMP specified in Best Management Practices for Construction Sites. Construction would result in temporary, minor adverse impact on soil quality. No impact to prime farmland soil. No mechanisms to further impact soil or cause erosion during operation of the OPC. No impact on soil quality.	No impact

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Hydrology and Water Quality	**Construction:** Temporary, negligible adverse impact on hydrology and water quality by regrading site drainage patterns; construction stormwater managed through UT DEQ UPDES General Construction Stormwater Permit and permit-required Best Management Practices (BMPs), such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement a Spill Prevention, Control, and Countermeasure (SPCC) plan. **Operation:** Permanent, negligible adverse impact from increased impervious surface; private entity would design, construct, maintain, and operate a stormwater management system, such as oil-water separators in parking lot drainage systems, infiltration systems with liners or pre-treatment measures; and install and maintain advanced stormwater controls, including detention basins, rain gardens, and permeable pavement to reduce runoff and promote infiltration.	**Construction:** Temporary, negligible adverse impact on hydrology and water quality by regrading site drainage patterns; construction stormwater managed through UT DEQ UPDES General Construction Stormwater Permit and permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement an SPCC plan. **Operation:** Permanent, negligible adverse impact from increased impervious surface; private entity would design, construct, maintain, and operate a stormwater management system, such as oil-water separators in parking lot drainage systems, infiltration systems with liners or pre-treatment measures; and install and maintain advanced stormwater controls, including detention basins, rain gardens, and permeable pavement to reduce runoff and promote infiltration.	**Construction:** Temporary, negligible adverse impact on hydrology and water quality by regrading site drainage patterns; construction stormwater managed through UT DEQ UPDES General Construction Stormwater Permit and permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement an SPCC plan. **Operation:** Permanent, negligible adverse impact from increased impervious surface; private entity would design, construct, maintain, and operate a stormwater management system, such as oil-water separators in parking lot drainage systems, infiltration systems with liners or pre-treatment measures; and install and maintain advanced stormwater controls, including detention basins, rain gardens, and permeable pavement to reduce runoff and promote infiltration.	**Construction:** Temporary, negligible adverse impact on hydrology and water quality by regrading site drainage patterns; construction stormwater managed through UT DEQ UPDES General Construction Stormwater Permit and permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement an SPCC plan. **Operation:** Permanent, negligible adverse impact from increased impervious surface; private entity would design, construct, maintain, and operate a stormwater management system, such as oil-water separators in parking lot drainage systems, infiltration systems with liners or pre-treatment measures; and install and maintain advanced stormwater controls, including detention basins, rain gardens, and permeable pavement to reduce runoff and promote infiltration.	No impact
Land Use	**Construction and Operation:** Development consistent with City of Salt Lake zoning regulations; no impact on land use or zoning.	**Construction and Operation:** Development consistent with City of Millcreek zoning regulations; no impact on land use or zoning.	**Construction and Operation:** Development consistent with City of Salt Lake zoning regulations; no impact on land use or zoning.	**Construction and Operation:** Development consistent with City of Salt Lake zoning regulations; no impact on land use or zoning.	No impact
Noise and Vibration	**Construction:** Construction noise maintained in compliance with Salt Lake County noise ordinance and the U.S. Occupational Safety and Health Administration (OSHA) worker hearing conservation program, resulting in temporary, negligible adverse impacts on noise-sensitive receptors in the surrounding community. No impact on vibration-sensitive receptors. **Operation:** Distance from sensitive receptors means operation would have a permanent, negligible adverse impact on noise-sensitive receptors and no impact on vibration.	**Construction:** Construction noise maintained in compliance with Salt Lake County noise ordinance and the OSHA worker hearing conservation program, resulting in temporary, minor adverse impacts on noise-sensitive receptors in the surrounding community. Temporary, minor adverse impact on vibration-sensitive receptors, minimized by distance and assessed further in final design phase. **Operation:** Distance from sensitive receptors means operation would have a permanent, negligible adverse impact on noise-sensitive receptors and no impact on vibration.	**Construction:** Construction noise maintained in compliance with Salt Lake County noise ordinance and the OSHA worker hearing conservation program, resulting in temporary, minor adverse impacts on noise-sensitive receptors in the surrounding community. Temporary, minor adverse impact on vibration-sensitive receptors, minimized by distance and assessed further in final design phase. **Operation:** Distance from sensitive receptors means operation would have a permanent, negligible adverse impact on noise-sensitive receptors and no impact on vibration.	**Construction:** Construction noise maintained in compliance with Salt Lake County noise ordinance and the OSHA worker hearing conservation program, resulting in temporary, minor adverse impacts on noise-sensitive receptors in the surrounding community. No impact on vibration-sensitive receptors. **Operation:** Distance from sensitive receptors means operation would have a permanent, negligible adverse impact on noise-sensitive receptors and no impact on vibration.	No impact

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Solid Waste and Hazardous Materials	**Construction:** The Phase I Environmental Site Assessment (ESA) did not identify any recognized environmental conditions (RECs) at the site. Buildings present on site are either known to contain or may potentially contain regulated building materials, such as asbestos and lead. Prior to the demolition of any building, the private entity would be responsible for assessing the buildings for asbestos-containing materials (ACM) in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants and the OSHA Asbestos Construction Standard (29 CFR 1926.1101). Should ACM be present, the private entity would be responsible for proper abatement and disposal in accordance with USEPA 40 CFR 61.150 and UDEQ Asbestos Rule R307-801. The private entity would be responsible for assessing the buildings for lead-based paint (LBP) and determining the appropriate disposal requirements by testing samples using the Toxicity Characteristic Leaching Procedure. Should LBP be present, the private entity would be responsible for proper worker protection per the OSHA Lead-in-Construction standard and disposal at a USEPA-approved landfill in accordance with the Resource Conservation and Recovery Act (RCRA). 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 at the site would be transported to an appropriate landfill for reuse as fill or daily cover. Private entity would be responsible for proper management and disposal of all other construction wastes.	**Construction:** The Phase I ESA identified a REC associated with the former dry-cleaner (Norge Laundry and Dry Cleaning Village), operated on the northeast portion of the site. A subsequent investigation identified VOCs in the soil and groundwater beneath the footprint of the former drycleaner building. However, the concentrations were below USEPA Regional Screening Level and Maximum Contaminant Level and the UDEQ Initial Screening Level standards. Prior to the start of the construction phase, the private entity would coordinate with UDEQ to determine if further investigation or remediation is necessary. If required, the private entity would carry out these actions to achieve a "no further action" status from UDEQ for this legacy release. Mitigation to reduce VOC concentrations in soil could include excavating and disposing of contaminated soil off-site in a USEPA-approved landfill. Groundwater mitigation could include monitored natural attenuation; using VOC-absorbent socks in recovery wells; bioremediation, or chemical treatment. The OPC foundation could also be constructed with a vapor barrier to prevent VOCs from migrating into the facility. Mitigation could also include an institutional control, such as a deed restriction, to limit human exposure to contaminated soil and groundwater. Additionally, buildings present on site are either known to contain or may potentially contain regulated building materials, such as asbestos and lead. Prior to the demolition of any building, the private entity would be responsible for assessing the buildings for asbestos-containing materials (ACM) in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants and the OSHA Asbestos Construction Standard (29 CFR 1926.1101). Should ACM be present, the private entity would be responsible for proper abatement and disposal in accordance with	**Construction:** A Phase II ESA was conducted following the Phase I ESA, to assess the three identified RECs. The Phase II ESA showed petroleum hydrocarbon contamination in soil and groundwater collected near the former USTs and the oil-water separator. The petroleum hydrocarbon contamination concentrations were above UDEQ's unrestricted land use regulatory screening criteria in soil and Tier 1 screening levels in groundwater. Prior to the start of the construction phase, the private entity would coordinate with UDEQ to determine if further investigation or remediation is necessary. If required, the private entity would carry out these actions to achieve a "no further action" status from UDEQ for this legacy release. Mitigation to reduce petroleum hydrocarbon concentrations in soil could include excavating and disposing of contaminated soil off-site at a USEPA-approved landfill. Groundwater mitigation could include monitored natural attenuation; using oil-absorbent socks in recovery wells; bioremediation, or chemical treatment. The OPC foundation could also be constructed with a vapor barrier to prevent petroleum hydrocarbons from migrating into the facility. Mitigation could also include an institutional control, such as a deed restriction, to limit human exposure to contaminated soil and groundwater. Additionally, buildings present on site are either known to contain or may potentially contain regulated building materials, such as asbestos and lead. Prior to the demolition of any building, the private entity would be responsible for assessing the buildings for asbestos-containing materials (ACM) in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants and the OSHA Asbestos Construction Standard (29 CFR 1926.1101). Should ACM be present, the private entity would be responsible for proper	**Construction:** The Phase I ESA identified one REC and Vapor Encroachment Condition (VEC). One pad-mounted transformer, with evidence of staining and leaks, was observed on the side of the transformer and the surrounding soil. The presence of the pad-mounted transformer with an unknown installation date and evidence of staining and leaks on it and in the immediate surrounding area is considered a REC and a VEC. Additionally, buildings present on site are either known to contain or may potentially contain regulated building materials, such as asbestos and lead. Prior to the demolition of any building, the private entity would be responsible for assessing the buildings for asbestos-containing materials (ACM) in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants and the OSHA Asbestos Construction Standard (29 CFR 1926.1101). Should ACM be present, the private entity would be responsible for proper abatement and disposal in accordance with USEPA 40 CFR 61.150 and UDEQ Asbestos Rule R307-801. The private entity would be responsible for assessing the buildings for LBP and determining the appropriate disposal requirements by testing samples using the Toxicity Characteristic Leaching Procedure. Should LBP be present, the private entity would be responsible for proper worker protection per the OSHA Lead-in-Construction standard and disposal at a USEPA-approved landfill in accordance with RCRA. 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 at the site would be transported to an appropriate	No impact

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	Operation: Routine wastes managed per federal and state regulations. Solid waste generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility. Permanent, negligible adverse impact due to minimal volumes of waste generated and disposed.	USEPA 40 CFR 61.150 and UDEQ Asbestos Rule R307-801. The private entity would be responsible for assessing the buildings for LBP and determining the appropriate disposal requirements by testing samples using the Toxicity Characteristic Leaching Procedure. Should LBP be present, the private entity would be responsible for proper worker protection per the OSHA Lead-in-Construction standard and disposal at a USEPA-approved landfill in accordance with RCRA. 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 at the site would be transported to an appropriate landfill for reuse as fill or daily cover. Private entity would be responsible for proper management and disposal of all other construction wastes. **Operation:** Routine wastes managed per federal and state regulations. Solid waste generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility. Permanent, negligible adverse impact due to minimal volumes of waste generated and disposed.	abatement and disposal in accordance with USEPA 40 CFR 61.150 and UDEQ Asbestos Rule R307-801. The private entity would be responsible for assessing the buildings for LBP and determining the appropriate disposal requirements by testing samples using the Toxicity Characteristic Leaching Procedure. Should LBP be present, the private entity would be responsible for proper worker protection per the OSHA Lead-in-Construction standard and disposal at a USEPA-approved landfill in accordance with RCRA. 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 at the site would be transported to an appropriate landfill for reuse as fill or daily cover. Private entity would be responsible for proper management and disposal of all other construction wastes. **Operation:** Routine wastes managed per federal and state regulations. Solid waste generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility. Permanent, negligible adverse impact due to minimal volumes of waste generated and disposed.	landfill for reuse as fill or daily cover. Private entity would be responsible for proper management and disposal of all other construction wastes. **Operation:** Routine wastes managed per federal and state regulations. Solid waste generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility. Permanent, negligible adverse impact due to minimal volumes of waste generated and disposed.	
Traffic, Transportation, and Parking	**Construction:** Prior to constructing entrances along public roads, the private entity would coordinate with UDOT and obtain UDOT Conditional Access Permit for new driveway connections to state-managed roads; UDOT Encroachment Permit for construction within the UDOT right-of-way. The private entity would obtain a South Salt Lake Public Way (Right-of-Way) Permit for work in the city-	**Construction:** Prior to constructing entrances along public roads, the private entity would coordinate with UDOT and obtain UDOT Conditional Access Permit for new driveway connections to state-managed roads; UDOT Encroachment Permit for construction within the UDOT right-of-way. The private entity would obtain a Millcreek Right-of-Way Permit for work in the city-managed right-of-way and	**Construction:** Prior to constructing entrances along public roads, the private entity would coordinate with UDOT and obtain UDOT Conditional Access Permit for new driveway connections to state-managed roads; UDOT Encroachment Permit for construction within the UDOT right-of-way. The private entity would obtain a South Salt Lake Public Way (Right-of-Way) Permit for work in the city-	**Construction:** Prior to constructing entrances along public roads, the private entity would coordinate with UDOT and obtain UDOT Conditional Access Permit for new driveway connections to state-managed roads; UDOT Encroachment Permit for construction within the UDOT right-of-way. The private entity would obtain a South Salt Lake Public Way (Right-of-Way) Permit for work in the city-	No impact

Resource	Alternative 1 (2191 South 300 West, South Salt Lake)	Alternative 2 (3300 South 1300 East, Millcreek)	Alternative 3 (3711 South State St., South Salt Lake)	Alternative 4 (2300 South 300 West, South Salt Lake)	No Action Alternative
	managed right-of-way and a South Salt Lake Traffic Control Permit for any lane closures or signage during construction. Construction material deliveries, facility entrance construction, worker commutes, and equipment removal would have a temporary, negligible traffic impact. **Operation:** Vehicle traffic would increase during operation, but the current Level of Service (LOS) "A" is projected to remain unchanged for up to the next 20 years, indicating no impact on traffic conditions.	submit a Traffic Control Plan, including engineered construction drawings, that conforms to the Manual on Uniform Traffic Control Devices. Construction material deliveries, facility entrance construction, worker commutes, and equipment removal would have a temporary, negligible traffic impact. **Operation:** Vehicle traffic would increase during operation, but the current LOS "A" and "C" at the two study intersections would remain unchanged for up to the next 20 years, indicating no impact on traffic conditions.	managed right-of-way and a South Salt Lake Traffic Control Permit for any lane closures or signage during construction. 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:** Vehicle traffic would increase during operation, but the current LOS "A" is projected to remain unchanged for up to the next 20 years, indicating no impact on traffic conditions.	managed right-of-way and a South Salt Lake Traffic Control Permit for any lane closures or signage during construction. 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:** Vehicle traffic would increase during operation, decreasing the current LOS "A" to "B" during the p.m. peak hour at one of two study intersections, while LOS "A" would remain for up to the next 20 years at the second study intersection, indicating a permanent, negligible adverse impact on traffic conditions.	
Utilities	**Construction:** Utilities services are available; extensions of utility lines to the site are required and responsibility of the private entity. Private entity to obtain permits required to connect to and utilize utility services. Private entity would be required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. This would result in a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use is not anticipated to impact service quality to existing customers. Private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewer utilities, lessening the demand for utilities. The increased use would result in a permanent, negligible adverse impact on utilities.	**Construction:** Utilities services are available; extensions of utility lines to the site are required and responsibility of the private entity. Private entity to obtain permits required to connect to and utilize utility services. Private entity would be required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. This would result in a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use is not anticipated to impact service quality to existing customers. Private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewer utilities, lessening the demand for utilities. The increased use would result in a permanent, negligible adverse impact on utilities.	**Construction:** Utilities services are available; extensions of utility lines to the site are required and responsibility of the private entity. Private entity to obtain permits required to connect to and utilize utility services. Private entity would be required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. This would result in a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use is not anticipated to impact service quality to existing customers. Private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewer utilities, lessening the demand for utilities. The increased use would result in a permanent, negligible adverse impact on utilities.	**Construction:** Utilities services are available; extensions of utility lines to the site are required and responsibility of the private entity. Private entity to obtain permits required to connect to and utilize utility services. Private entity would be required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. This would result in a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use is not anticipated to impact service quality to existing customers. Private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewer utilities, lessening the demand for utilities. The increased use would result in a permanent, negligible adverse impact on utilities.	No impact
Community Services	**Construction and Operation:** OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Salt Lake City Health Care System.	**Construction and Operation:** OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Salt Lake City Health Care System.	**Construction and Operation:** OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Salt Lake City Health Care System.	**Construction and Operation:** OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Salt Lake City Health Care System.	VA Salt Lake City Health Care System outpatient clinics would continue to be overburdened and

Resource	Alternative 1 (2191 South 300 West, South Salt Lake)	Alternative 2 (3300 South 1300 East, Millcreek)	Alternative 3 (3711 South State St., South Salt Lake)	Alternative 4 (2300 South 300 West, South Salt Lake)	No Action Alternative
	Permanent, beneficial impact on community services related to health care for Veterans. No impact on other local community services.	Permanent, beneficial impact on community services related to health care for Veterans. No impact on other local community services.	Permanent, beneficial impact on community services related to health care for Veterans. No impact on other local community services.	Permanent, beneficial impact on community services related to health care for Veterans. No impact on other local community services.	local Veterans would still experience service gaps. Permanent, significant adverse impact on community services for Veterans in Salt Lake City.
Socioeconomics	**Construction:** Potential spending for construction materials at local vendors and through employment of construction workers. Temporary, negligible beneficial impact on socioeconomics. **Operation:** Increase in staff and incidental spending on local services by staff employed at the new OPC. Permanent, negligible beneficial impact on socioeconomics. No impact at regional or state level.	**Construction:** Potential spending for construction materials at local vendors and through employment of construction workers. Temporary, negligible beneficial impact on socioeconomics. **Operation:** Increase in staff and incidental spending on local services by staff employed at the new OPC. Permanent, negligible beneficial impact on socioeconomics. No impact at regional or state level.	**Construction:** Potential spending for construction materials at local vendors and through employment of construction workers. Temporary, negligible beneficial impact on socioeconomics. **Operation:** Increase in staff and incidental spending on local services by staff employed at the new OPC. Permanent, negligible beneficial impact on socioeconomics. No impact at regional or state level.	**Construction:** Potential spending for construction materials at local vendors and through employment of construction workers. Temporary, negligible beneficial impact on socioeconomics. **Operation:** Increase in staff and incidental spending on local services by staff employed at the new OPC. 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 of the OPC. **Operation:** Community support for improving Veterans' timely access to modern, state-of-the-art health care services is anticipated.	**Construction:** No controversy anticipated during the construction of the OPC. **Operation:** Community support for improving Veterans' timely access to modern, state-of-the-art health care services is anticipated.	**Construction:** No controversy anticipated during the construction of the OPC. **Operation:** Community support for improving Veterans' timely access to modern, state-of-the-art health care services is anticipated.	**Construction:** No controversy anticipated during the construction of the OPC. **Operation:** Community support for improving Veterans' timely access to modern, state-of-the-art health care services is anticipated.	Controversy anticipated as existing VA clinics remain overburdened. Permanent, significant adverse impact.

Agency Coordination and Public Involvement

VA electronically sent a scoping notice to selected federal, state, and local agencies; Native American 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 Salt Lake Tribune* 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 D.

This Draft EA is published for a 30-day 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 Salt Lake Tribune*. 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 Salt Lake City Public Library, located at 210 East 400 South, Salt Lake City, UT 84111. 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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Tables

Figures

Appendices

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ACAM	Air Conformity Applicability Model
ACM	asbestos-containing material
amsl	above mean sea level
APE	Area of Potential Effects
BMP	Best Management Practice
CAA	Clean Air Act
CFR	Code of Federal Regulations
CLV	Critical Lane Volume
CO	carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalents
CZMA	Coastal Zone Management Act
dBA	A-weighted decibels
EA	Environmental Assessment
EO	Executive Order
FEMA	U.S. Federal Emergency Management Agency
FIRMette	Flood Insurance Rate Map
GCR	USEPA General Conformity Rule
GDP	gross domestic product
GHG	greenhouse gas
HUC	hydrologic unit code
HVAC	heating, ventilation, and air conditioning
ICRIP	Initial Cultural Resource Impact Prediction
ISL	UDEQ Initial Screening Level
JVWCD	Jordan Valley Water Conservancy District
LBP	lead-based paint
LOS	Level of Service
LUST	Leaking Underground Storage Tank
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
MSA	Metropolitan Statistical Area
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO_2	Nitrogen dioxide
NOA	Notice of Availability
NPDES	National Pollutant Discharge Elimination System

Acronym/Abbreviation	Definition
NRCS	National Resource Conservation Service
NRHP	National Register of Historic Places
OPC	Outpatient Clinic
OSHA	U.S. Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
Phase I ESA	ASTM Phase I Environmental Site Assessment
Phase II ESA	ASTM Phase II Environmental Site Assessment
PM	particulate matter
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental conditions
RSL	Regional Screening Level
SHPO	State Historic Preservation Office
SO_2	Sulfur dioxide
SPCC	spill prevention, control, and countermeasure plan
TCE	trichloroethylene
UDEQ	Utah Department of Environmental Quality
UDOT	Utah Department of Transportation
UPDES	Utah Pollutant Discharge Elimination System
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground storage tank
UT	Utah
VA	U.S. Department of Veterans Affairs
VAMC	VA Medical Center
VdB	vibration decibels
VEC	Vapor Encroachment Condition
VOC	volatile organic compounds

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 Salt Lake City, UT. VA is considering offers received from four private entities, each of which provided a conceptual plan to construct an OPC at one of four potential sites. This EA identifies each potential site and its corresponding conceptual plan as Alternative 1, 2, 3, and 4. VA would select only one of the four Alternatives for the OPC. A location map showing the four Alternative site locations is presented in Figure 1. The Alternative 1, 2, 3, and 4 site locations are listed below and shown in maps provided in Figures 2 through 5.

- **Alternative 1**: 2191 South 300 West, South Salt Lake, Salt Lake County, UT (Figure 2).
- **Alternative 2**: 3300 South 1300 East, Millcreek, Salt Lake County, UT (Figure 3).
- **Alternative 3**: 3711 South State Street, South Salt Lake, Salt Lake County, UT (Figure 4).
- **Alternative 4**: 2300 South 300 West, South Salt Lake, Salt Lake County, UT (Figure 5).

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. Salt Lake City OPC Proposed Action Alternative Site Locations

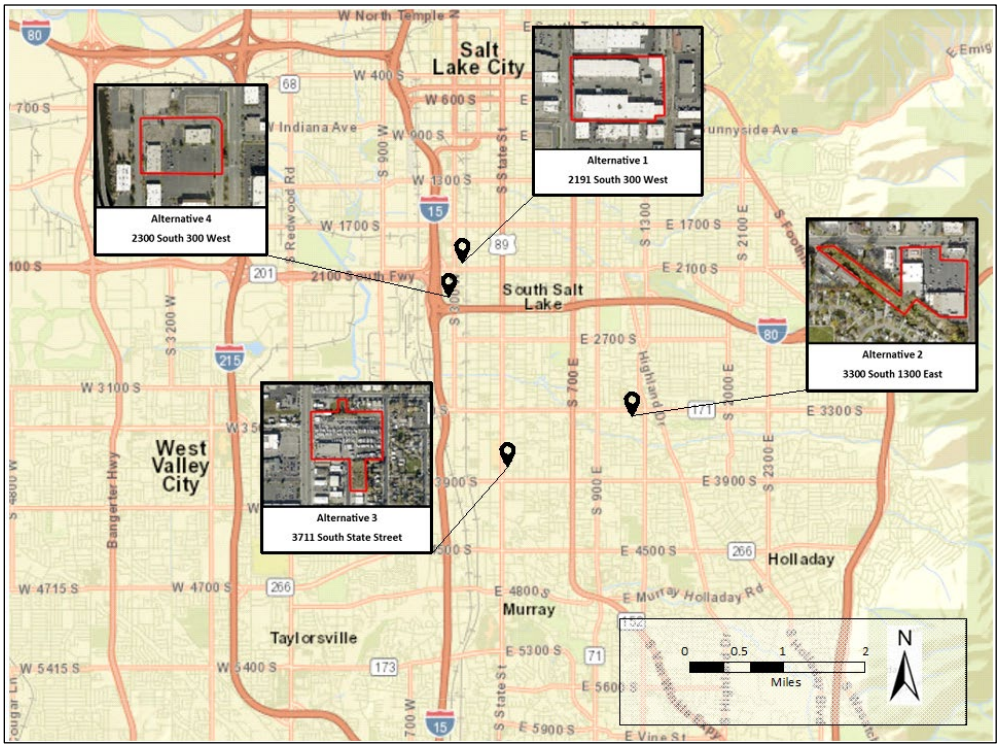


Figure 2. Alternative 1 – 2191 South 300 West Site Location Map

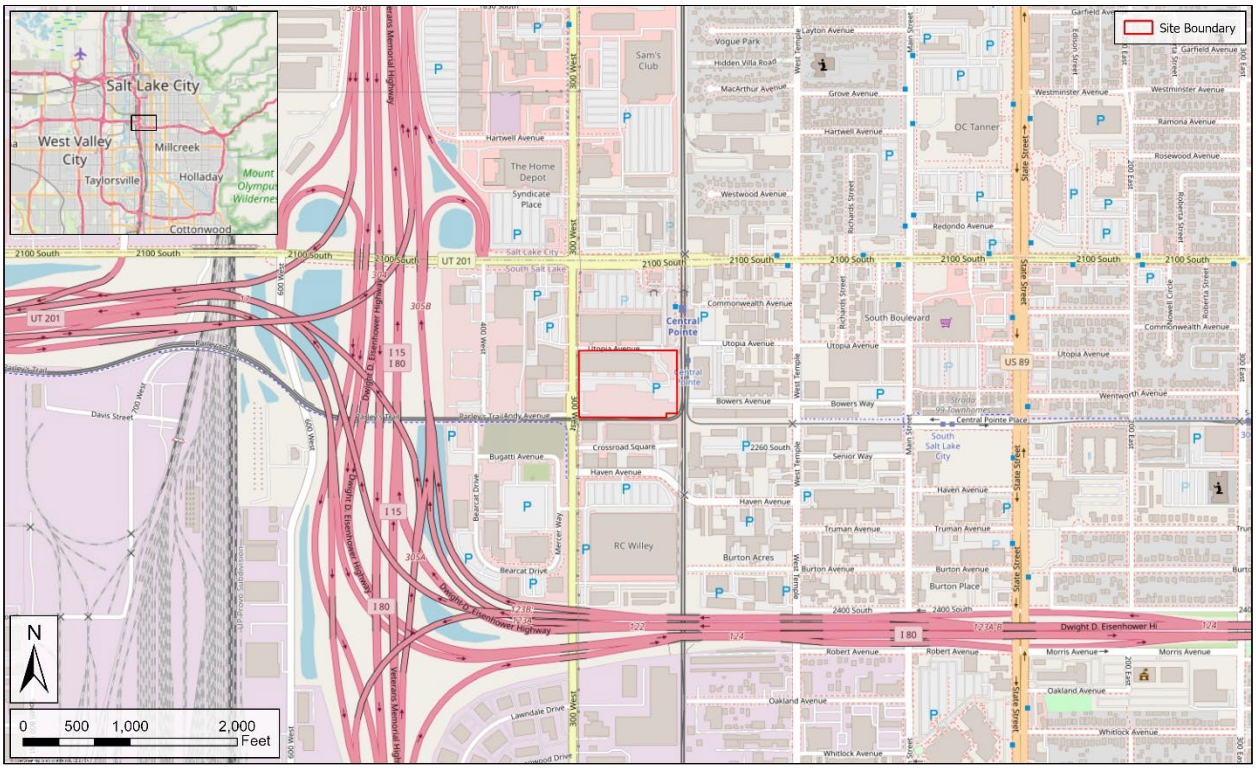


Figure 3. Alternative 2 – 3300 South 1300 East Site Location Map

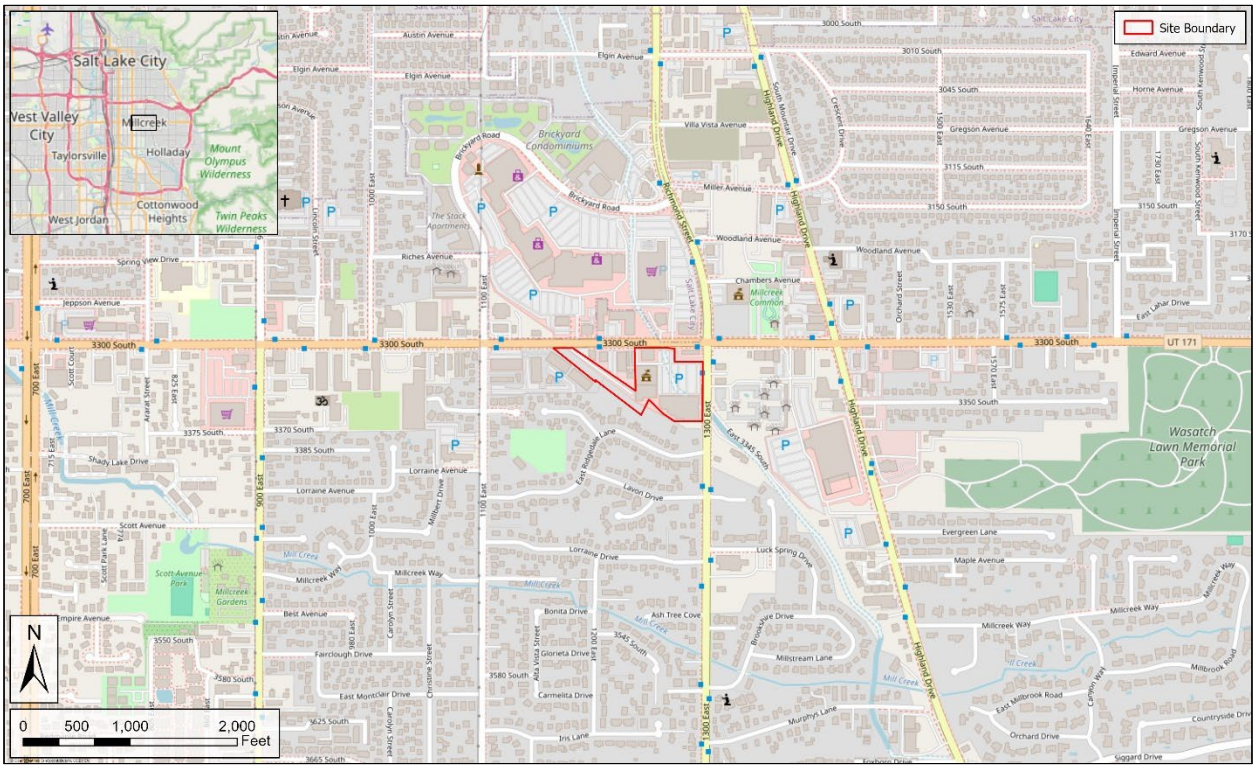


Figure 4. Alternative 3 – 3711 South State Street Site Location Map

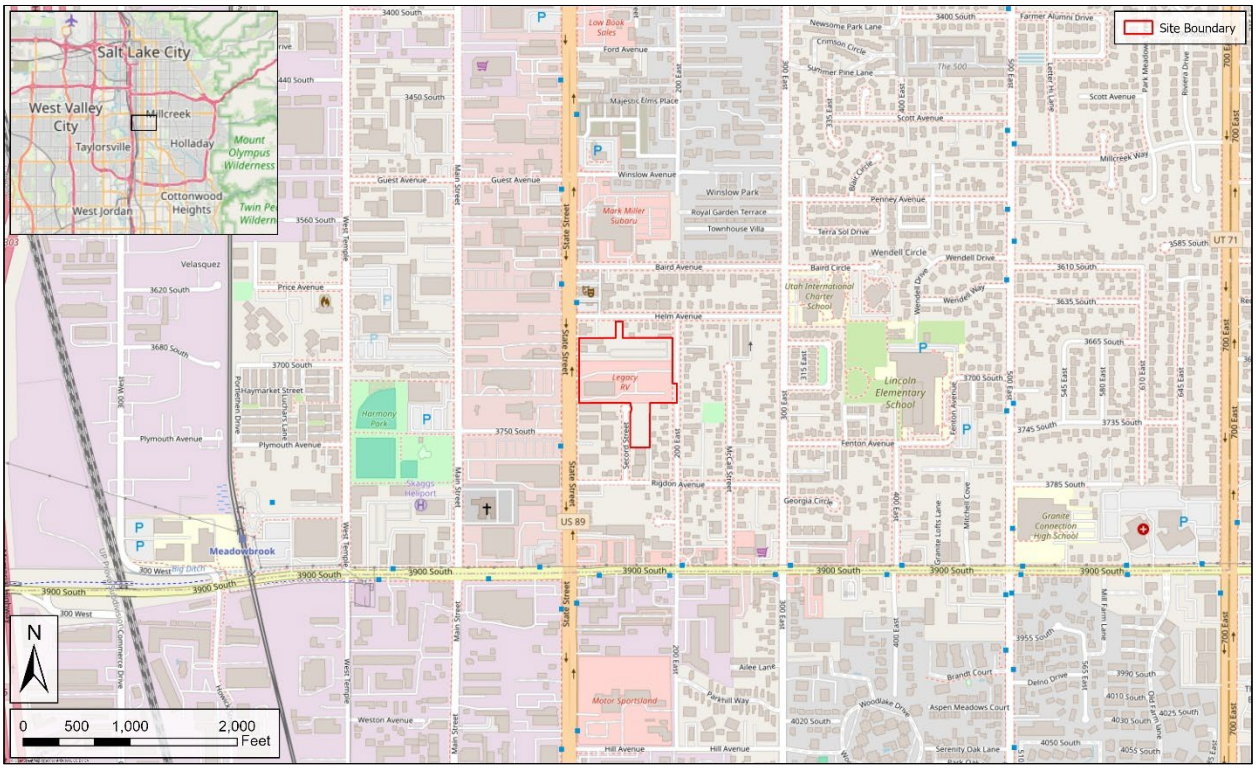
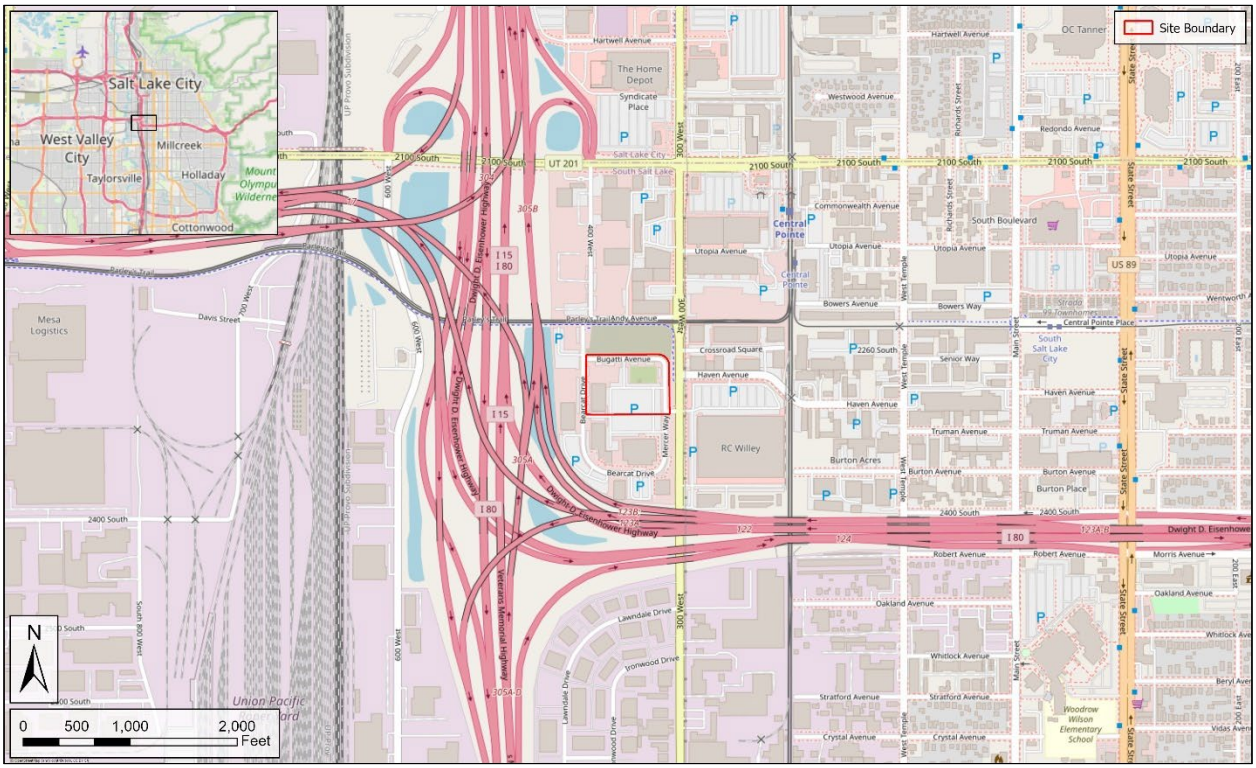


Figure 5. Alternative 4 – 2300 South 300 West Site Location Map



1.1 Background

The VA Salt Lake City Health Care System offers a wide range of health, support, and facility services for Veterans in parts of Utah, Idaho, and Nevada, through the main George E. Wahlen VA Medical Center (VAMC) in Salt Lake City and ten OPCs throughout the region. The locations of the existing VA clinics, along with their distances from Salt Lake City, are presented in Table 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 provide additional capacity within the VA Salt Lake City Health Care System by addressing space gaps and operational inefficiencies at existing clinics. These issues were identified through the VA Strategic Capital Investment Planning process. By expanding its capacity, VA would be able to provide area Veterans with timely access to state-of-the-art health care and mental health services in a modern facility commensurate with current and projected demands.

Table 1. Existing VA Salt Lake City Health Care System Outpatient Clinics

VA Clinic	Address	Distance from Salt Lake City
George E. Wahlen VA Medical Center	500 Foothill Drive, Salt Lake City, UT 84148	Located in northeastern Salt Lake City
Cache Valley VA Clinic	2380 North 400 East, Suite G, North Logan, UT 84341-1769	69 miles N
Elko VA Clinic	2719 Argent Avenue, Suite 9 Elko, NV 89801-8443	204 miles W
Idaho Falls VA Clinic	640 South Woodruff Avenue Idaho Falls, ID 83401-5299	184 miles N
Ogden VA Clinic	3945 South Washington Boulevard, Suite 1 South Ogden, UT 84403-1825	29 miles N
Orem VA Clinic	774 South State Street Orem, UT 84058-6308	35 miles S
Pocatello VA Clinic	500 South 11th Avenue Pocatello, ID 83201-4835	148 miles N
Price VA Clinic	189 South 600 West, Suite B Price, UT 84501-2833	98 miles SE
Roosevelt VA Clinic	245 West 200 North Roosevelt, UT 84066-2740	105 miles E
South Jordan VA Clinic	5119 West Daybreak Parkway South Jordan, UT 84009-5111	17 miles SW
St. George VA Clinic	585 East Riverside Drive, Riverfront Medical Center, Suite 300 St. George, UT 84790-7141	270 miles S

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

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

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 Salt Lake City, UT. 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, 2, 3, or 4, the private entity would design and construct the OPC in compliance with applicable VA design requirements and applicable federal, state, and local regulations, as well as meeting Green Building Initiative Green Globes certification (GBI 2025), which would minimize energy-related emissions using energy-efficient systems where feasible. Prior to construction, the private entity would be responsible for obtaining all applicable federal, state, and local permits from appropriate government authorities. Construction would take approximately 18-24 months, with operation of the OPC to follow.

Construction would involve clearing the existing development within the proposed limits of disturbance, followed by grading, excavation for the building foundation and utilities, 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 and parking garage, as well as paving for roads, parking, and new entrances. The OPC is anticipated to be no more than three stories. On-site parking for approximately 600 vehicles would be provided through a combination of ground-level parking and a two-level parking garage. Construction would require the use of diesel-fueled off-road equipment (backhoes, loaders, graders, paving equipment), transport of building materials to the site using on-road multi-axle delivery vehicles, travel to and from the site by construction workers, asphalt paving, and vertical construction of the OPC and associated infrastructure.

Upon completion of the construction phase, the VA Salt Lake City Health Care System would administer and staff the OPC, with approximately 128 staff members expected. The new Salt Lake City OPC would provide enhanced primary care services, compensation and pension examinations, women's clinic, residency program, compensation and pension, whole health, pathology and laboratory medicine, pharmacy service, clinic management, primary care mental health integration, primary care service administration, business service/health administration service program, engineering service, logistics service, police service, and canteen services. Primary care and Women's Health services currently provided at the George E. Wahlen VAMC would be relocated to the new OPC, along with supporting staff. 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 considering offers received from four private entities that have proposed conceptual designs for the OPC and supporting infrastructure at one of the four potential sites. Under the Proposed Action, VA would select only one of the four Alternatives for the OPC. This EA identifies the four action alternatives as Alternatives 1, 2, 3, and 4, as described in the following list:

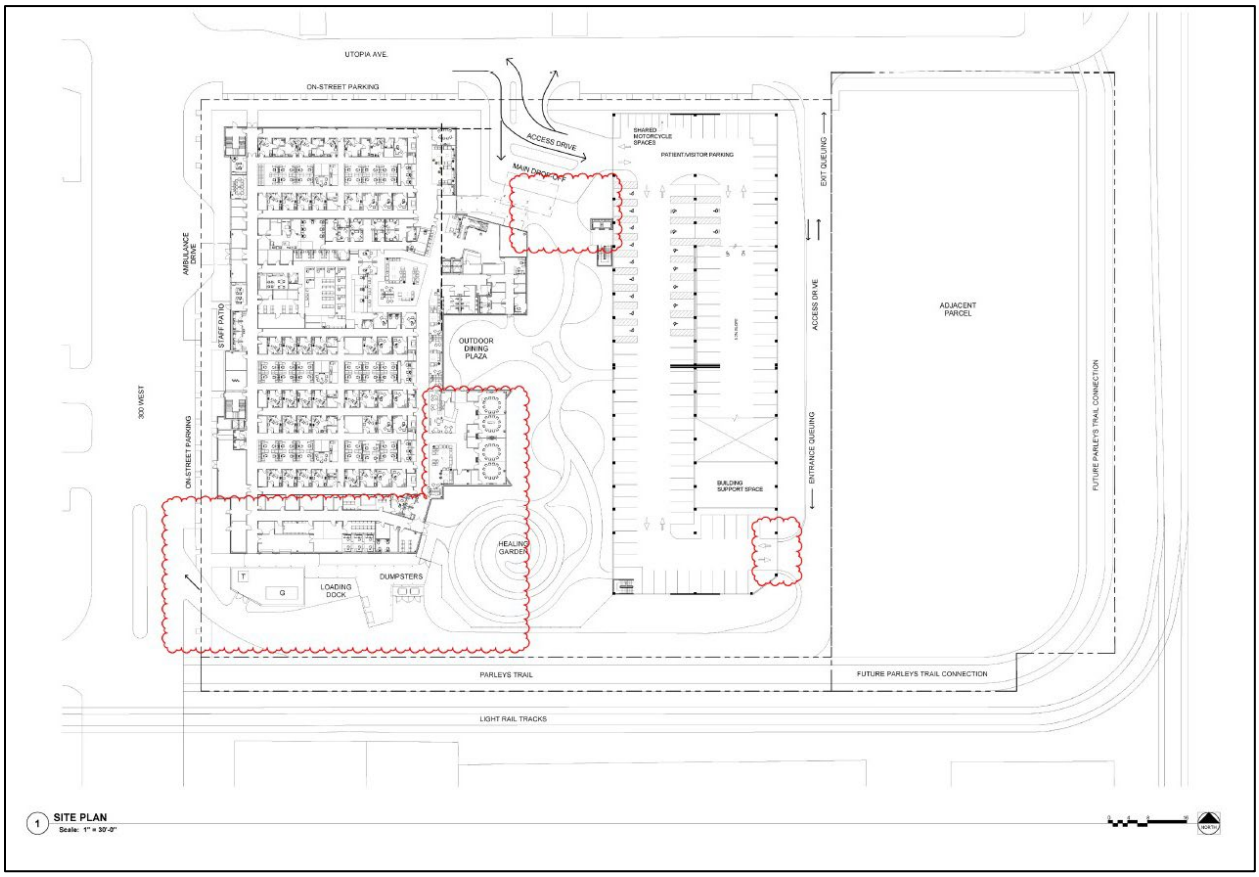
2.1.1.1 Alternative 1 – 2191 South 300 West

The Alternative 1 site is located at 2191 South 300 West, South Salt Lake, UT. The site covers approximately 7 acres of developed land in a commercial area (Figure 2). The site is a single parcel identified by the Salt Lake City Tax Assessor as Parcel ID 15242040050000. The OPC building would be

aligned in the western portion of the site and the parking garage in the eastern portion of the site (Figure 6). A pedestrian path with landscaped grounds would be located between the OPC and the parking garage. The proposed OPC would be two stories, with a footprint of approximately 62,000 square feet (SF) and approximately 113,862 SF of interior space.

The OPC main entrance drive would be located on Utopia Avenue and would provide visitors with a drop-off area between the OPC and the parking garage. A secondary entrance for visitors, staff, and deliveries would be on Utopia Drive, approximately 150 feet east of the main entrance. A dedicated ambulatory drive (drop-off point) would be located along South 300 West. A one-way exit drive on the southern portion of the site would allow vehicles to exit the site onto the northbound travel lane of 300 West.

Figure 6. Alternative 1 – Salt Lake City OPC Conceptual Design

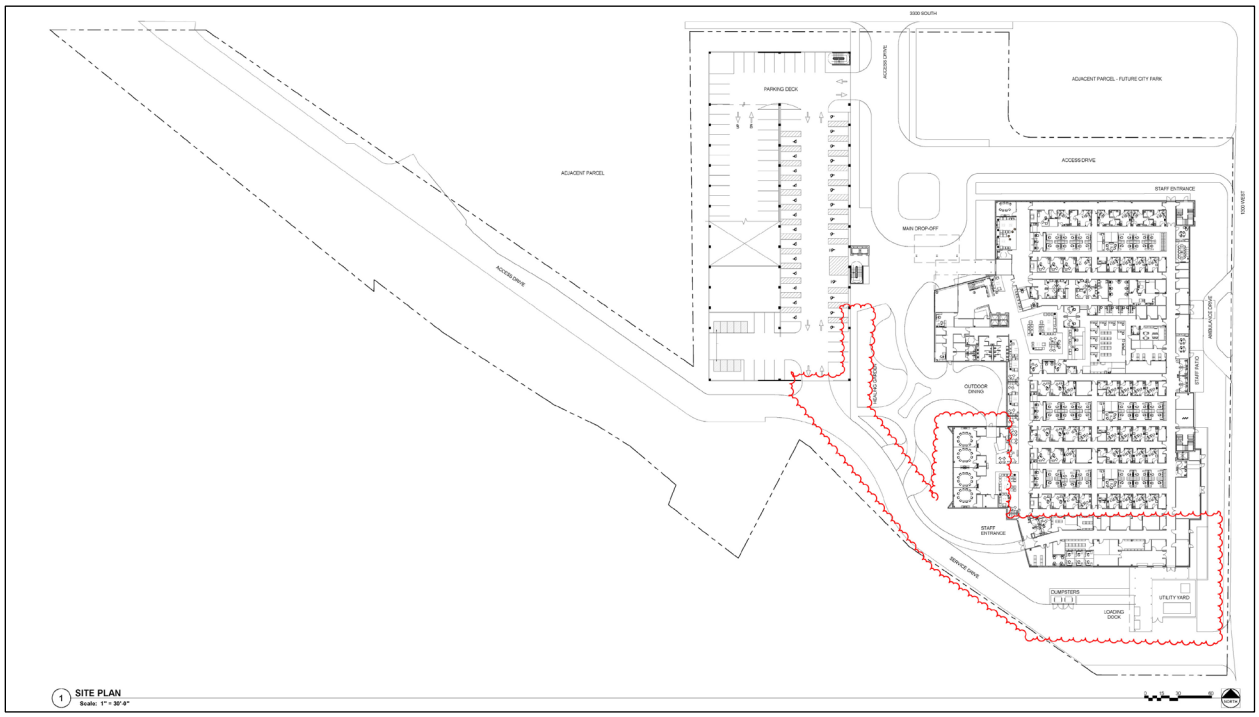


2.1.1.2 Alternative 2 – 3300 South 1300 East

The Alternative 2 site is located at 3300 South 1300 East, Millcreek, UT. The site covers approximately 6 acres of developed land in a commercial area (Figure 3). The site is comprised of nine abutting parcels identified by the Salt Lake City Tax Assessor as Parcel IDs 15242520020000, 15242520010000, 15241780010000, 15241780040000, 15242520040000, 15242520050000, 15241780020000, 15241780030000, and 15242520080000. The OPC building would be aligned in the southeastern portion of the site, with the parking garage on the western portion of the site (Figure 7). A pedestrian path with landscaped grounds would be located between the OPC and the garage; a path from the garage would also provide staff access to a dedicated staff entrance on the southwestern side of the OPC building. The proposed OPC would be two stories, with a footprint of approximately 62,000 SF and approximately 113,862 SF of interior space.

The OPC would have two main entrance drives, one on South 1300 East and one on 1300 West; both access drives would lead to a single main drop-off rotary in front of the OPC visitor entrance and also allow vehicles to continue to the parking garage. A dedicated ambulatory drive (drop-off point) would be located along 1300 West. An existing access drive that extends southeast from 300 South to the site would provide access to the southern entrance of the parking garage.

Figure 7. Alternative 2 – Salt Lake City OPC Conceptual Design

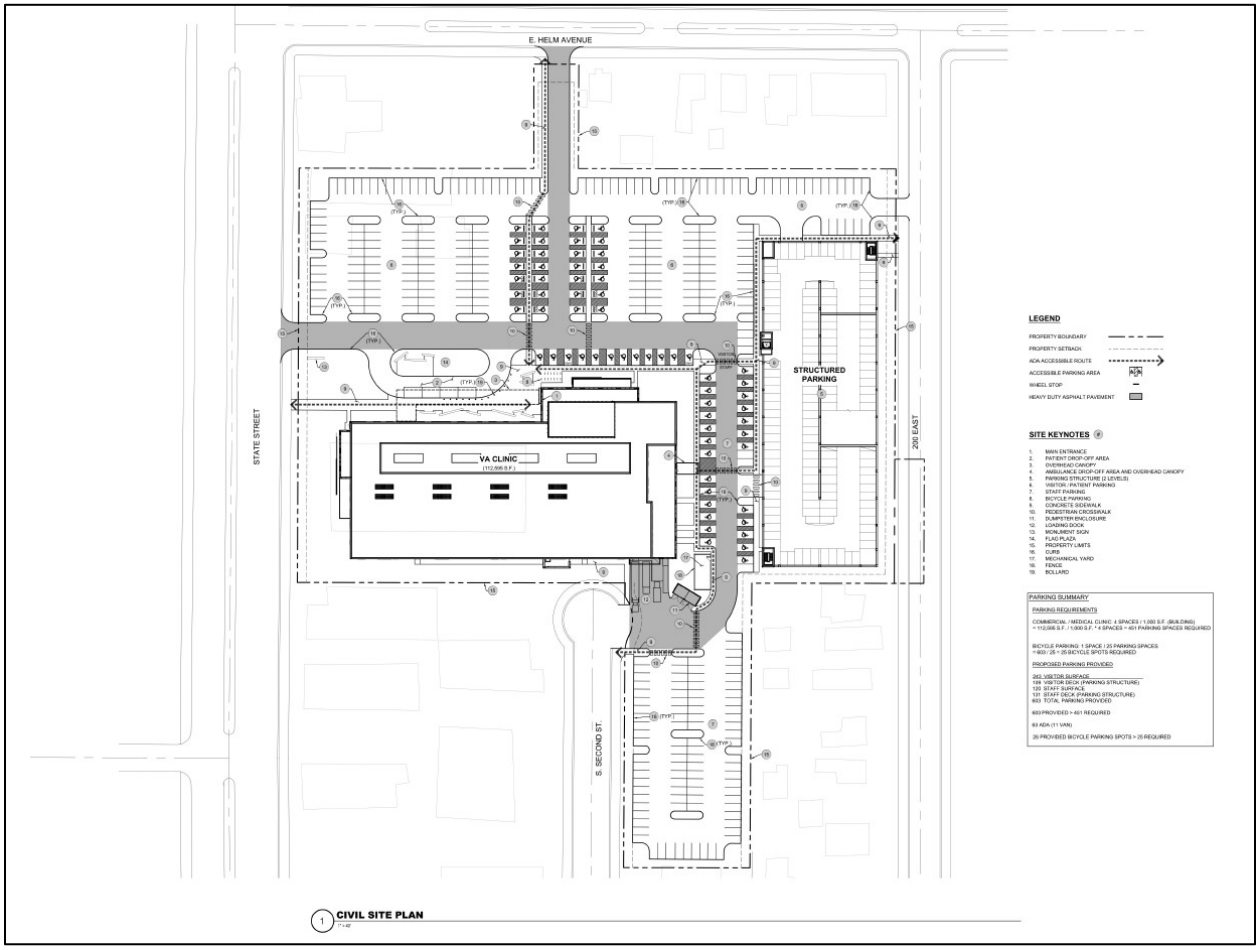


2.1.1.3 Alternative 3 – 3711 South State Street

The Alternative 3 site is located at 3711 South State Street, South Salt Lake, UT. The site covers approximately 8.4 acres of developed land in a commercial area (Figure 4). The site is comprised of seven abutting parcels identified by the Salt Lake City Tax Assessor as Parcel IDs 16311520030000, 16311520110000, 16311520120000, 16311520140000, 16311520150000, 16311780010000, and 16311780020000. The OPC building would be aligned in the central portion of the site, with the parking garage on the eastern portion of the site (Figure 8). Separate ground-level parking lots would be located in the northern and southern portions of the site, with the southern lot reserved for staff. A pedestrian walkway that crosses the staff entrance road would provide access to and from the OPC and the parking garage. The Alternative 3 conceptual development plan does not show any pedestrian pathways with landscaped grounds. The proposed OPC would be two stories, with a footprint of approximately 62,000 SF and approximately 112,595 SF of interior space.

The OPC would have three main vehicle entrance drives, with one on E. Helm Avenue, one on 200 East, and one on State Street. The E. Helm Avenue and 200 East access drives would provide access to the north ground-level parking lot, while the State Street access drive would also provide access to this lot and the main drop-off point to the OPC building. The State Street access drive continues around the eastern side of the OPC building to provide access to the southern ground-level parking lot for staff. The southern parking lot would also access the northern terminus of "South Secord Street". The parking garage would have a single entrance/exit point on 200 East.

Figure 8. Alternative 3 – Salt Lake City OPC Conceptual Design

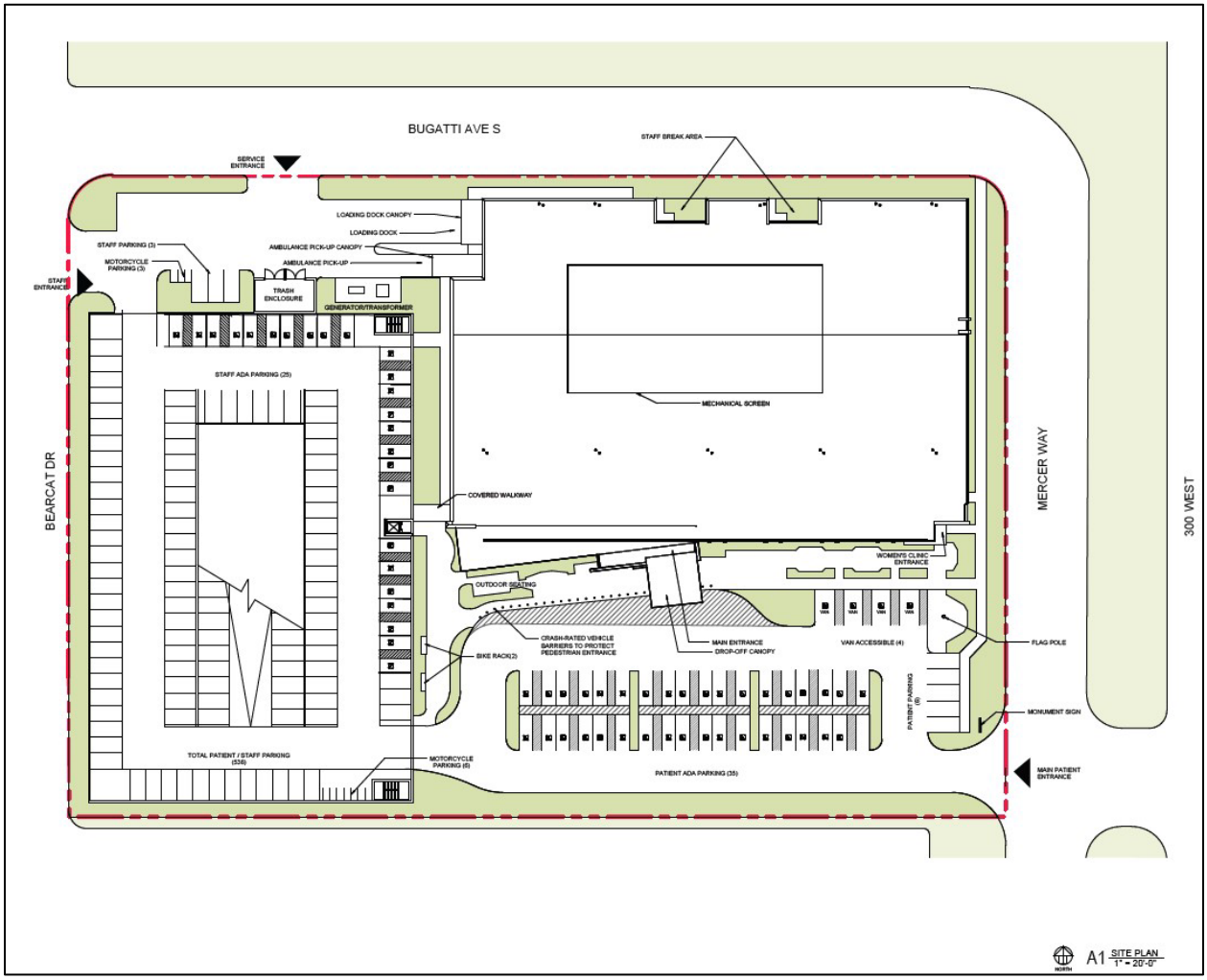


2.1.1.4 Alternative 4 – 2300 South 300 West

The Alternative 4 site is located at 2300 South 300 West, South Salt Lake, UT. The site covers approximately 4.4 acres of developed land in a commercial area (Figure 5). The site is comprised of nine abutting parcels identified by the Salt Lake City Tax Assessor as Parcel IDs 15242520020000, 15242520010000, 15241780010000, 15241780040000, 15242520040000, 15242520050000, 15241780020000, 15241780030000, and 15242520080000. The OPC building would be aligned in the northeast portion of the site, with the parking garage on the western portion of the site (Figure 9). A ground-level parking lot with spaces reserved for handicapped parking would be located in the southeastern portion of the site. A covered pedestrian walkway would provide access to and from the OPC and the parking garage. The Alternative 4 conceptual development plan shows several outdoor landscaped plazas throughout the site. The proposed OPC would be two stories, with a footprint of approximately 60,000 SF and approximately 112,362 SF of interior space.

The OPC would have one main vehicle entrance drive on Mercy Street, which is accessible from 300 West. This entrance would provide access to the drop-off point at the OPC building main entrance, the handicap parking area, and to the parking garage. An ambulatory/service entrance drive would be present along Bugatti Avenue South. A separate staff vehicle entrance would be along Bearcat Drive; this staff entrance would also provide access to the northern entrance of the parking garage.

Figure 9. Alternative 4 – Salt Lake City OPC Conceptual Design



2.2 No Action

Under the No Action alternative, VA would not award a lease to a private entity for a new Salt Lake City OPC, and the Proposed Action would not be implemented. The existing VA clinics would continue to be overburdened and unable to meet the growing medical needs of the Veteran population in the Salt Lake City area. The No Action alternative does not meet 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 potential impacts of the Proposed Action.

2.3 Summary of Alternatives

VA has identified four alternatives (Alternatives 1, 2, 3, and 4) and the No Action alternative. A single alternative — either Alternative 1, 2, 3, or 4 — 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, 2, 3, and 4 sites and analyzes the potential impacts of implementing the Proposed Action or the No Action Alternative on the human environment. The affected environment includes each site and, depending on the resource, a region surrounding the site. When describing the impacts to resources associated with the Proposed Action, the impacts apply to Alternatives 1, 2, 3, and 4; in cases where impacts to a resource are unique to Alternatives 1, 2, 3, and 4, a separate subheading for the analysis is provided.

To ensure consistency in the evaluation of potential environmental impacts, this section defines key impact terminology used throughout the EA. These definitions clarify the nature, scale, and duration of the anticipated 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 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 significant impacts, a more detailed Environmental Impact Statement may be required to further evaluate those effects 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. A definition of the environmental resource is provided in italics at the start of each section.

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 – Alternative 1

The Alternative 1 site is located at 2191 South 300 West, southeast of the intersection of South 300 West and West Utopia Avenue, in South Salt Lake, UT. The City of South Salt Lake is located south of Salt Lake City but is within the Salt Lake City metropolitan area. The site is approximately 7 acres and is developed with four structures, including two warehouses extending along most of the north and south sides of the site, and two smaller office/shop buildings on the northeastern portion of the site. Asphalt paving covers the remainder of the site. The site is bordered by the TRAX light rail Green Line tracks to the south and the Green/Blue/Red Lines to the east. The area surrounding the site is commercial and heavily developed. Overhead utility lines are present along the northern and western borders of the site, in addition to the light rail infrastructure present to the south and east of the site.

There are no scenic resources, prominent scenic vistas, state scenic highways, or any other notable visual resources in the vicinity of the Alternative 1 site.

3.2.1.2 Proposed Action – Alternative 2

The Alternative 2 site is located at 3300 South 1300 East, southwest of the intersection of South 1300 East and East 3300 South in Millcreek, UT. The City of Millcreek is located south of Salt Lake City but is within the Salt Lake City metropolitan area. The site is approximately 6 acres and is improved with a shopping plaza with three separate buildings and a shared asphalt-paved parking lot. There are few on-site, sparse trees located adjacent to the on-site buildings on the western and southern boundaries of the site. An asphalt-paved access drive extends northwest from the southwestern portion of the site to 3300 South; this access drive is approximately 700 feet long and 80 feet wide. A residential apartment complex is located adjacent to the western side of the access drive. Views of the access drive from the apartment complex are obstructed by a vinyl fence/wall and several large mature trees located off-site but adjacent to the western boundary of the Alternative 2 site. A retail shopping plaza is located adjacent to the eastern side of the access drive; the access drive is accessible from the rear parking area of the shopping plaza. The area to the north and east of the site is predominantly commercial and heavily developed, while the area to the south is predominantly residential. The residential area is at a lower elevation than the site. A steep vegetated embankment that increases in elevation between the residential area and the site effectively obstructs views into the southern portion of the site. Overhead utility lines run along the eastern border of the site.

There are no scenic resources, prominent scenic vistas, state scenic highways, or any other notable visual resources in the vicinity of the Alternative 2 site.

3.2.1.3 Proposed Action – Alternative 3

The Alternative 3 site is located at 3711 South State Street, on the east side of State Street (US 89) between East Helm and Rigdon Avenues, with 200 East Street located along the eastern border of the site. The site is located in South Salt Lake. The site is approximately 8.4 acres and is improved with a recreational vehicle dealership and rental car business, four buildings, and an asphalt-paved parking lot. An approximately 0.5-acre sparsely vegetated area is present on the northern portion of the site. An approximately 1-acre wooded area is present on the southern portion of the site. Overhead utility lines are present just beyond the northern site boundary. The site is located in a highly developed mixed commercial and residential

area. Generally, the areas west of the site are heavily developed with commercial and industrial buildings, while areas to the east are residential.

There are no scenic resources, prominent scenic vistas, state scenic highways, or any other notable visual resources in the vicinity of the Alternative 3 site.

3.2.1.4 Proposed Action – Alternative 4

The Alternative 4 site is located at 2300 South 300 West, northeast of Veterans Memorials Highway (I-15) and Dwight D. Eisenhower Highway (I-80), west of Mercer Way, east of Bearcat Drive, and south of Bugatti Avenue South, in South Salt Lake, UT. The site is approximately 4.4 acres and is improved with the Times Square Business Park with one commercial building, an asphalt-paved parking lot, and a graded area where two former buildings were located prior to their demolition between 2021 and 2022. The asphalt-paved parking lot extends south beyond the southern site boundary and is shared with an office complex that is not part of the Alternative 4 site. The area surrounding the site is densely developed with commercial buildings. The site is approximately 300 feet east of I-15 and 675 feet north of I-80.

There are no scenic resources, prominent scenic vistas, state scenic highways, or any other notable visual resources in the vicinity of the Alternative 4 site.

3.2.2 Environmental Consequences

Under Alternative 1, 2, 3, or 4, 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 clearing the site of existing improvements, grading and compacting exposed soil, excavation for utilities, paving for new entrances and parking areas, and vertical construction of the OPC and parking garage. If necessary, the construction contractor would erect temporary construction privacy fencing to obstruct views into the site during the construction phase. The fencing would also control access into the site to authorized users only.

The operation of Alternative 1, 2, 3, or 4, would permanently change the improvements at the respective site to a modern medical center of similar size and scale to existing development to other commercial developments in the area. The grounds at the OPC would be professionally maintained throughout the duration of VA's lease.

The following sections describe aesthetic impacts that are unique to each alternative.

3.2.2.1 Proposed Action – Alternative 1

3.2.2.1.1 Construction

Construction activities at the Alternative 1 site would be visible to passersby on South 300 West and West Utopia Avenue, as well as to light rail users. The site and surrounding areas are heavily developed with industrial buildings and infrastructure. As a result, the presence of construction activities at the Alternative 1 site would not significantly alter the visual character of the area.

Therefore, construction of the Proposed Action at the Alternative 1 site would have a temporary, negligible adverse impact on the visual aesthetics. This impact would end once the construction phase is complete.

3.2.2.1.2 Operation

The OPC would be visible to passersby on South 300 West and West Utopia Avenue, as well as to the light rail users. The size and scale of the OPC development would be similar to the prior development at the site and to existing commercial developments in the area surrounding the site. The OPC development

would replace the older structures and improvements at the site with a modern facility with professionally maintained grounds.

Therefore, the operation of the Proposed Action would have a permanent, negligible beneficial impact on aesthetics at the Alternative 1 site.

3.2.2.2 Proposed Action – Alternative 2

3.2.2.2.1 Construction

Construction activities at the Alternative 2 site would be visible to passersby on South 1300 East and East 3300 South. The steep vegetated slope would continue to obstruct views into the site from the residential areas to the south. Given the existing commercial development and infrastructure at the site and in the surrounding areas, the construction activities at the Alternative 2 site will not significantly alter the visual character of the area.

Therefore, construction of the Proposed Action would have a temporary, negligible adverse impact on the visual aesthetics of the Alternative 2 site. This impact would end once the construction phase is complete.

3.2.2.2.2 Operation

The OPC would be visible to passersby on South 1300 East and East 3300 South. The size and scale of the OPC development would be similar to the prior development at the site and to existing commercial developments in the area surrounding the site. The OPC development would replace the older structures and improvements at the site with a modern facility with professionally maintained grounds.

Therefore, the operation of the Proposed Action would have a permanent, negligible beneficial impact on aesthetics at the Alternative 2 site.

3.2.2.3 Proposed Action – Alternative 3

3.2.2.3.1 Construction

Construction activities at the Alternative 3 site would be visible to passersby on State Street, South Second Street, East Helm Avenue and 200 East, as well as to residences along 200 East. Construction of the southern staff parking lot would require clearing of the approximately 1-acre wooded area on the southern portion of the site; the permanent loss of this wooded area would be visible to the residents located immediately east adjacent of this area.

Therefore, construction of the Proposed Action would have a temporary, negligible adverse impact on the visual aesthetics of the Alternative 3 site. This impact would end once the construction phase is complete.

3.2.2.3.2 Operation

The OPC would be visible to passersby on State Street, South Secord Street, East Helm Avenue and 200 East, as well as to residences along 200 East. The size and scale of the OPC development would be similar to the prior development at the site and to existing commercial developments in the area surrounding the site. The OPC development would replace the older structures and improvements at the site with a modern facility with professionally maintained grounds.

Therefore, the operation of the Proposed Action would have a permanent, negligible beneficial impact on aesthetics at the Alternative 3 site.

3.2.2.4 Proposed Action – Alternative 4

3.2.2.4.1 Construction

Construction activities at the Alternative 4 site would be visible to passersby on South 300 West, as well as Bearcat Drive, Bugatti Avenue and Mercer Way. The site and surrounding areas are heavily developed with industrial buildings and infrastructure. As a result, the presence of construction activities at the Alternative 4 site would not significantly alter the visual character of the area.

Therefore, construction of the Proposed Action would have a temporary, negligible adverse impact on the visual aesthetics of the Alternative 4 site. This impact would end once the construction phase is complete.

3.2.2.4.2 Operation

The OPC would be visible to passersby on South 300 West, as well as Bearcat Drive, Bugatti Avenue and Mercer Way. The size and scale of the OPC development would be similar to the prior development at the site and to existing commercial developments in the area surrounding the site. The OPC development would replace the older structures and improvements at the site with a modern facility with professionally maintained grounds.

Therefore, the operation of the Proposed Action would have a permanent, negligible beneficial impact on aesthetics at the Alternative 4 site.

3.2.2.5 No Action Alternative

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

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 Utah Department of Environmental Quality (UDEQ) regulate air quality in the state of Utah. UT DEQ develops rules, regulations, and policies for regulating air quality in accordance with applicable legislation. USEPA regulations may not be superseded; however, state and local regulations may be more stringent.

3.3.2 Federal Air Quality Standards

The Clean Air Act (CAA) of 1970 (42 U.S. Code 7401 et seq.) authorizes USEPA to establish National Ambient Air Quality Standards (NAAQS) (40 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 dioxide (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 were once classified as nonattainment but has since reached attainment through implementation of a maintenance plan. Salt Lake County is designated by USEPA as serious non-attainment for 8-hour O_3 (2015 standard), serious non-attainment for $PM_{2.5}$ (2006 standard), and in non-attainment for SO_2 (1971 standard). Salt Lake County achieved moderate attainment for PM_{10} on March 27, 2020, and attainment for CO on March 22, 1999 (USEPA 2025).

3.3.3 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" or CO_2e.

3.3.4 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 places of worship. The following sections describe sensitive receptors unique to each Alternative site.

3.3.4.1 Proposed Action - Alternative 1

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

- **Places of worship**: Faith Temple Pentecostal Church, Salt Lake City Church of God, Full Armor Bible Center, The Church of Jesus Christ of Latter-day Saints, Church of the Living Dead
- **Schools**: Madison Junior High School, McKinley School, South High School, Salt Lake Community College – South City Campus
- **Daycare**: Little Rascals Children's Center
- **Nursing homes**: Monument Health South Lake

3.3.4.2 Proposed Action - Alternative 2

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

- **Places of worship**: Southside Church of Christ, The Church of Jesus Christ of Latter-day Saints
- **Schools**: Utah Schools for the Deaf and Blind Salt Lake Campus - Jean Massieu School of the Deaf, Millcreek Elementary School, Nibley Park School, Roosevelt Elementary School, William Penn Elementary School, Salt Lake Junior Academy, Sunitas Montessori School
- **Daycare**: Rock-A-Bye Infant and Child Care Center, Children's Corner Preschool and Childcare, The Eastside Preschool, and Little Geniuses Learning Center
- **Nursing homes**: Twin Oaks Assisted Living

- **Hospitals**: Doxey-Hatch Medical Center, Olympus View Hospital, Parkside Recovery Center, Saint Mark's Hospital

3.3.4.3 Proposed Action - Alternative 3

Sensitive receptors within an approximately one-mile radius of the Alternative 3 site include:

- **Places of worship**: New Life Christian Center, The Church of Jesus Christ of Latter-day Saints, Jehovah's Witnesses Granite Park Congregation, Potters House Christian Fellowship Church, Christian Congregation in the United States
- **Schools**: Blaine Junior High School, Granite Park Junior High School, Granite Park Junior High School, Lincoln Elementary School, Granite High School, Lumos Language School
- **Daycare**: Smart Kids Salt Lake
- **Nursing homes**: Rosewood Assisted Care, Monument Health Murray Creek, Twin Oaks Assisted Living, Trinity Care Center
- **Hospital**: Healthsouth Salt Lake Surgical Center

3.3.4.4 Proposed Action - Alternative 4

Sensitive receptors within an approximately one-mile radius of the Alternative 4 site include:

- **Places of worship**: Salt Lake City Church of God, The Church of Jesus Christ of Latter-day Saints, Full Armor Bible Center, Church of the Living Dead
- **Schools**: Madison Junior High School, McKinley School
- **Daycare**: Little Rascals Children's Center
- **Nursing homes**: None
- **Hospitals**: None

3.3.5 Environmental Consequences

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 for each Alternative were estimated using the U.S. Air Force's Air Conformity Applicability Model (ACAM). Although a construction period from 2026 to 2027 was applied 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. 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.

3.3.5.1 Proposed Action – Alternatives 1, 2, 3, and 4

3.3.5.1.1 Construction

Under Alternatives 1, 2, 3, or 4, the Proposed Action would produce construction-related emissions over an approximately 18- to 24-month construction period. Construction activities would generate criteria pollutants from the use of diesel-fueled off-road equipment (backhoes, loaders, graders, paving equipment), on-road heavy-duty vehicles (multi-axle delivery vehicles), construction workers' passenger

vehicles, curing of asphalt pavement, and interior painting. Construction activities would also generate fugitive dust from land clearing and earth moving activities. The construction-related emissions would stop once construction is completed.

The estimated construction emissions calculated for Alternatives 1, 2, 3 and 4 are similar, as shown in Table 3, Table 4, Table 5, and Table 6, respectively. The annual net changes in estimated emissions associated with construction of the OPC are below the GCR thresholds established at 40 CFR 93.153(b). Therefore, a GCR Determination is not warranted. Though negligible, the construction of the Proposed Action under Alternatives 1, 2, 3, or 4 would contribute GHG emissions to the region, but these emissions would stop once construction is completed.

To further reduce criteria pollutants and GHG emissions during construction of the Proposed Action under any of the Action Alternatives, 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 tracking of loose soil and the generation of dust by implementing construction best management practices (BMP).

The estimated construction criteria pollutant and GHG emissions for Alternative 1, 2, 3, and 4, are provided in Tables 2, 3, 4, and 5, respectively.

Therefore, construction of the Proposed Action under Alternatives 1, 2, 3, or 4, would have temporary, negligible adverse impact on air quality.

3.3.5.1.2 Operation

The private entity would be required to design and construct the facility to meet the Green Building Initiative Green Globes certification (GBI 2024), which would minimize energy-related emissions using energy-efficient systems where feasible. Emissions would primarily result from increased vehicular traffic associated with patients, staff, and deliveries; heating, ventilation, and air conditioning; and monthly testing of two diesel-fueled emergency generators.

The estimated operational emissions of criteria pollutants and GHGs for Alternative 1, 2, 3, and 4, are provided in Tables 2, 3, 4, and 5, respectively. These data show the annual net changes in estimated criteria pollutant emissions for any of the Alternatives would be below the GCR thresholds established at 40 CFR 93.153(b). Therefore, a General Conformity Determination is not required.

While not negligible, VA has concluded the estimated GHG emissions from operation of the Proposed Action under Alternatives 1, 2, 3, or 4, would not be significant at a regional level.

Therefore, operation of the Proposed Action under Alternatives 1, 2, 3, or 4, would have a permanent, negligible adverse impact on air quality.

Table 2. Alternative 1 – 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)	General Conformity Threshold/Exceedance (ton/yr)
VOC	0.294	1.708	0.420	50 / No
NO_2	2.501	2.162	0.805	50 / No
CO	3.182	2.876	5.482	100 / No
SO_2	0.006	0.005	0.015	100 / No
PM_{10}	11.082	0.075	0.056	100 / No
$PM_{2.5}$	0.082	0.069	0.055	100 / No
Greenhouse Gas	**Year 1, construction emissions (metric ton/yr)**	**Year 2, construction emissions (metric ton/yr)**	**Year 3, operational emissions (metric ton/yr)**	**Threshold**
CO_2	547	456	1,015	No threshold specified
Methane	0.0211	0.0183	0.0329	No threshold specified
Nitrous oxide	0.0046	0.0039	0.0174	No threshold specified
CO_2e	549	458	1,019	No threshold specified

Table 3. Alternative 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)	General Conformity Threshold/Exceedance (ton/yr)
VOC	0.226	1.808	0.434	50 / No
NO_2	1.901	2.596	0.921	50 / No
CO	2.431	3.465	5.630	100 / No
SO_2	0.004	0.006	0.016	100 / No
PM_{10}	10.393	0.090	0.061	100 / No
$PM_{2.5}$	0.064	0.083	0.059	100 / No
Greenhouse Gas	**Year 1, construction emissions (metric ton/yr)**	**Year 2, construction emissions (metric ton/yr)**	**Year 3, operational emissions (metric ton/yr)**	**Threshold**
CO_2	401	547	1,052	No threshold specified
Methane	0.0157	0.0220	0.0340	No threshold specified
Nitrous oxide	0.0032	0.0046	0.0179	No threshold specified
CO_2e	402	549	1,056	No threshold specified

Table 4. Alternative 3 – 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)	General Conformity Threshold/Exceedance (ton/yr)
VOC	0.232	2.173	0.440	50 / No
NO_2	1.948	2.621	1.036	50 / No
CO	2.531	3.472	5.726	100 / No
SO_2	0.004	0.006	0.016	100 / No
PM_{10}	12.067	0.091	0.070	100 / No
$PM_{2.5}$	0.066	0.084	0.068	100 / No
Greenhouse Gas	**Year 1, construction emissions (metric ton/yr)**	**Year 2, construction emissions (metric ton/yr)**	**Year 3, operational emissions (metric ton/yr)**	**Threshold**
CO_2	408	560	1,175	No threshold specified
Methane	0.0161	0.0223	0.0364	No threshold specified
Nitrous oxide	0.0033	0.0047	0.0202	No threshold specified
CO_2e	409	562	1,179	No threshold specified

Table 5. Alternative 4 – 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, operation emissions (ton/yr)	General Conformity Threshold/Exceedance (ton/yr)
VOC	0.224	1.716	0.432	50 / No
NO_2	1.868	2.595	0.892	50 / No
CO	2.403	3.465	5.606	100 / No
SO_2	0.004	0.006	0.015	100 / No
PM_{10}	6.262	0.090	0.059	100 / No
$PM_{2.5}$	0.064	0.083	0.057	100 / No
Greenhouse Gas	**Year 1, construction emissions (metric ton/yr)**	**Year 2, construction emissions (metric ton/yr)**	**Year 3, operational emissions (metric ton/yr)**	**Threshold**
CO_2	386	546	1,020	No threshold specified
Methane	0.0153	0.0220	0.0334	No threshold specified
Nitrous oxide	0.0032	0.0046	0.0173	No threshold specified
CO_2e	388	548	1,024	No threshold specified

3.3.5.2 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. 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 Endangered Species Act, 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

3.4.1.1 Proposed Action – Alternatives 1 and 4

The Alternative 1 and 4 sites are improved with commercial buildings and located in highly developed commercial/industrial and residential areas, as shown in respective land cover maps for the Alternative 1 and 4 sites in Figure 10 and Figure 13. The Alternative 1 and 4 sites do not contain critical habitats or provide any suitable land to support listed wildlife.

3.4.1.2 Proposed Action – Alternative 2

The Alternative 2 site is improved with a shopping plaza with three separate buildings and a shared asphalt-paved parking lot. The Alternative 2 site is located in a highly developed commercial/industrial and residential area, as shown in the respective land cover map for the Alternative 2 site in ***Figure 11***. There are few on-site, sparse trees located adjacent to the on-site buildings on the western and southern boundaries of the site. These trees may provide limited habitat for common wildlife species. However, the Alternative 2 site vegetation is not critical habitat and does not provide habitat for listed species.

3.4.1.3 Proposed Action – Alternative 3

The Alternative 3 site consists of an auto sales lot, four buildings, and an asphalt-paved parking lot. The site is located in a highly developed commercial/industrial and residential area, as shown in the respective land cover map for the Alternative 3 site in Figure 12. The site contains approximately 0.5 acres of sparsely vegetated grounds in the northern portion of the site and approximately 1 acre of wooded grounds in the southern portion of the site. The remainder of the site is entirely developed with buildings and asphalt-paved parking lots. The Alternative 3 site does not contain critical habitat or any suitable habitat to support listed wildlife.

3.4.2 Environmental Consequences

3.4.2.1 Proposed Action – Alternatives 1 and 4

Under Alternatives 1 or 4, the construction and operation of the Proposed Action at either the Alternative 1 or 4 sites would have no impact on wildlife or habitat. This is due to the absence of any natural, undeveloped areas at either site.

3.4.2.2 Proposed Action – Alternative 2

Under Alternative 2, the conceptual site development plan shows that the adjacent off-site wooded area, located west adjacent to the on-site access road, would not be impacted by the Proposed Action. The few on-site, sparse trees located adjacent to the south and west sides of the on-site buildings would be removed. These trees may provide limited habitat for common wildlife species, but they are not critical habitat or habitat for listed species. Therefore, construction and operation of the Proposed Action would have a permanent, negligible adverse impact on wildlife and habitat.

3.4.2.3 Proposed Action – Alternative 3

Under Alternative 3, the conceptual site development plan shows that the existing vegetation in the northern and southern portions of the site would require removal during land clearing and grading.

The state of Utah enacted the Utah Heritage Tree Act in 1975, which requires the preservation of rare, threatened, or vanishing species of trees in order to preserve Utah's scenic beauty and historic past (Utah DNR 2025). None of the trees at the Alternative 3 site have been designated as a heritage tree under the Utah Heritage Tree Act program.

The Alternative 3 conceptual design plan shows that the vegetated areas at the site would be cleared of the existing trees, many of which are large and well-established. While the City of South Salt Lake does not currently require a tree removal permit for trees on private property, it is in the process of developing a new Urban Forestry Plan and corresponding ordinances. These regulations, which area anticipated as early as summer 2025, may introduce permit requirements, tree preservation standards, or mitigation obligations for the removal of large or significant trees. Because the timeline for the Alternative 3 site tree clearing has not yet been finalized, it is possible that any future site activity could fall under new tree-related permitting rules. The private entity would monitor the development of South Salt Lake's forestry regulations and coordinate with city staff to ensure compliance with any applicable requirements prior to tree clearing at the Alternative 3 site.

Therefore, construction and operation of the Proposed Action would have a permanent, negligible adverse impact on wildlife and habitat.

3.4.2.4 No Action Alternative

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

Figure 10. Alternative 1 – Proposed Action Site Land Cover Map

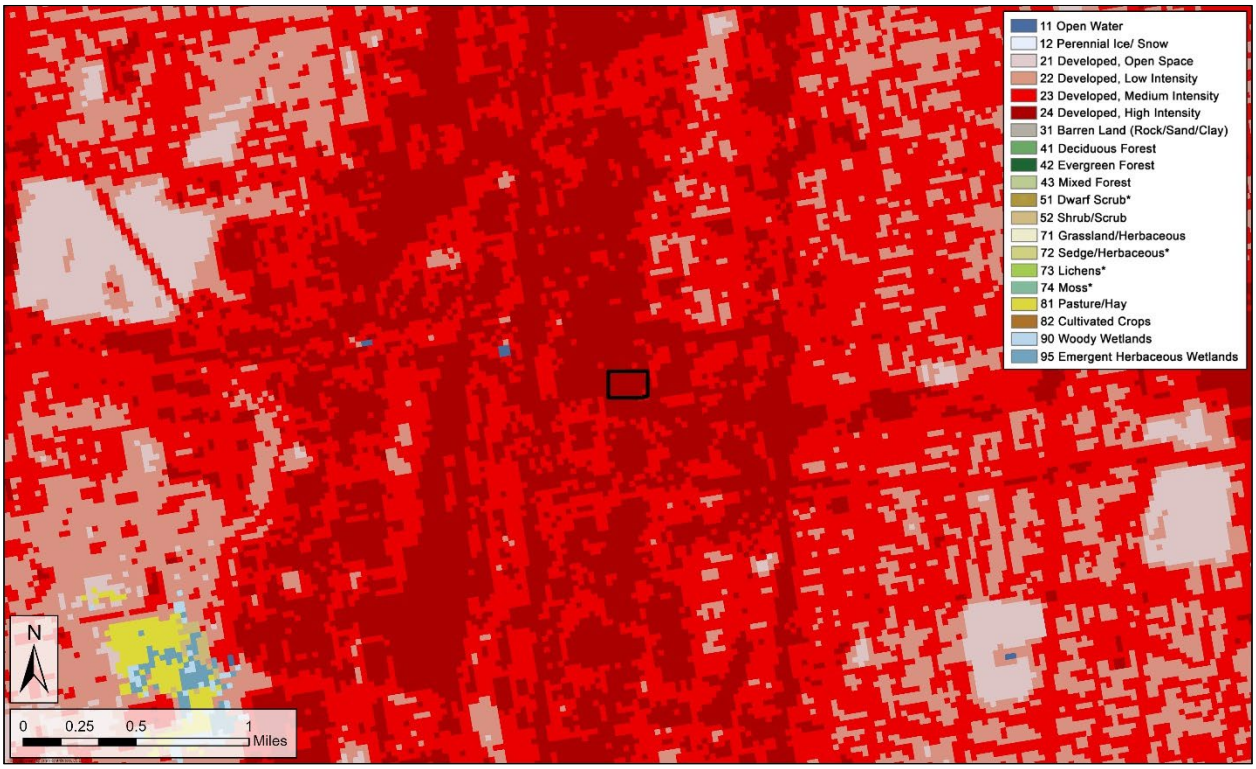


Figure 11. Alternative 2 – Proposed Action Site Land Cover Map

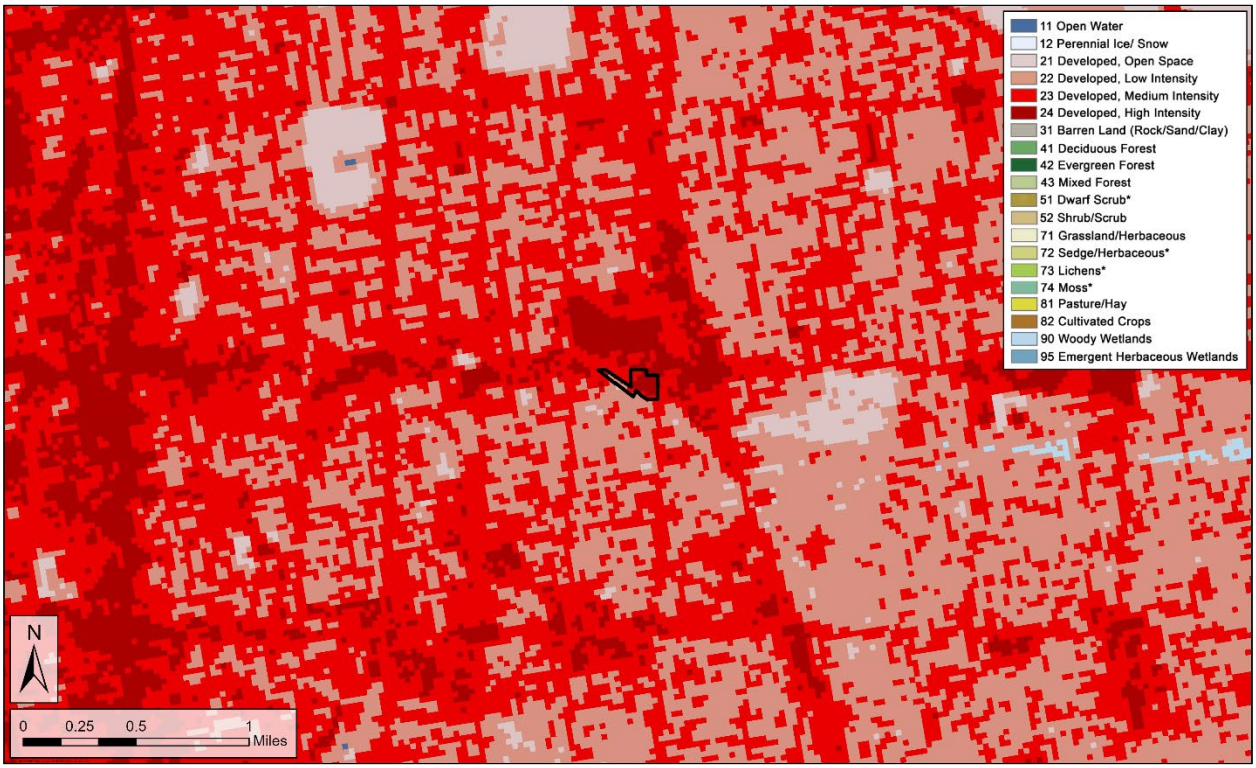


Figure 12. Alternative 3 – Proposed Action Site Land Cover Map

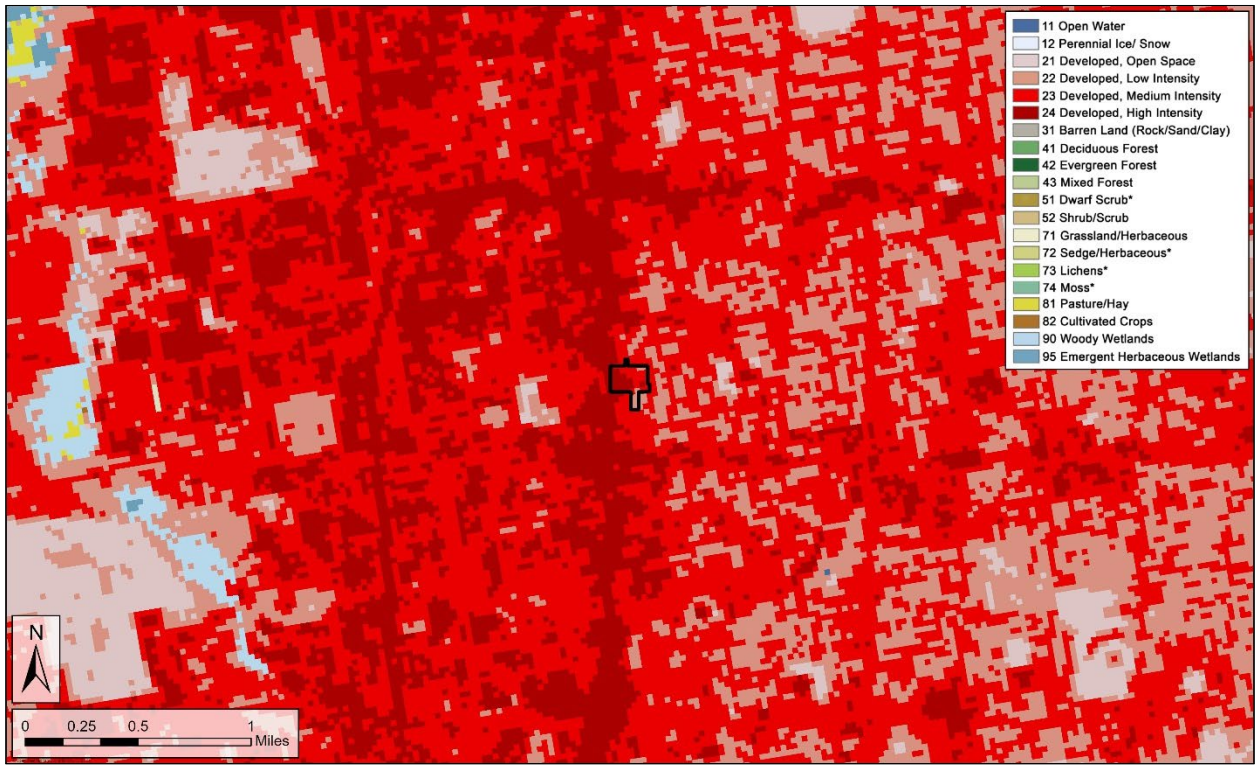
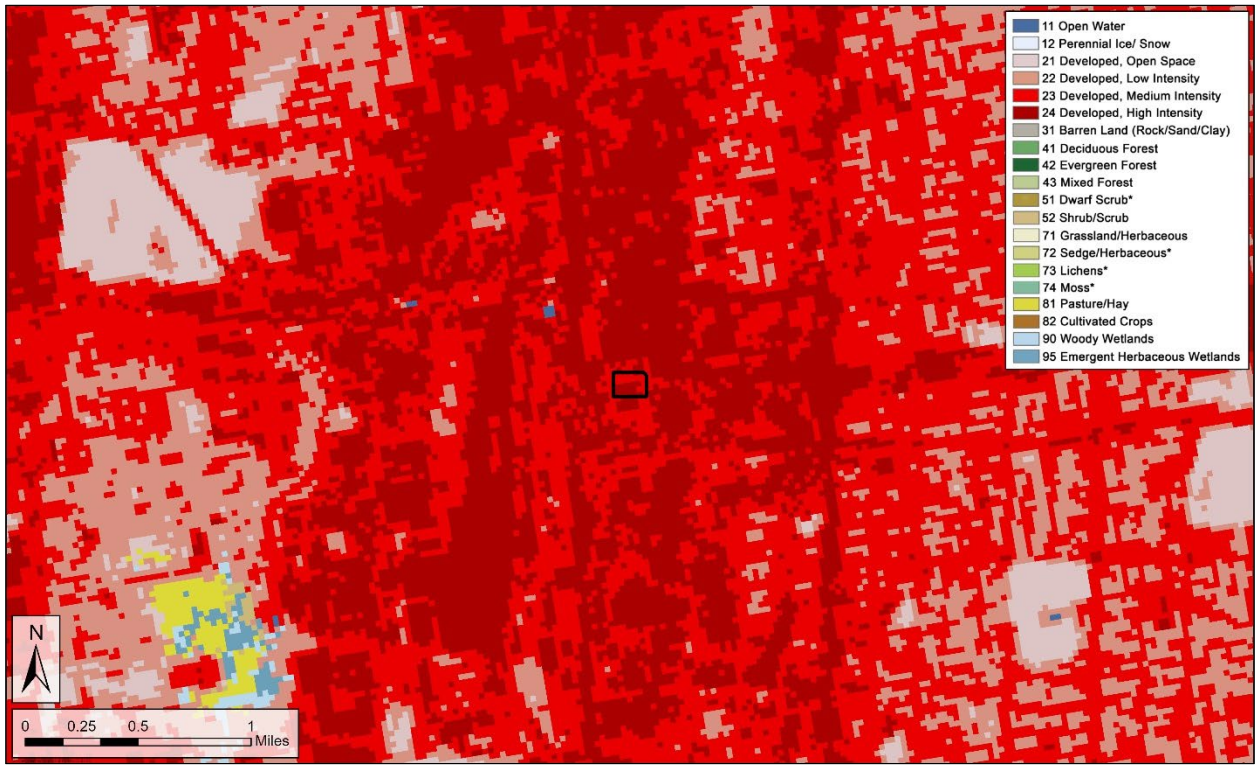


Figure 13. Alternative 4 – Proposed Action Site Land Cover Map



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 prior to construction is crucial because wetlands 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. Federal agencies must show their projects are consistent with state programs to implement the CZMA.

3.5.1 Affected Environment

3.5.1.1 Proposed Action – Alternative 1

3.5.1.1.1 Floodplains

The U.S. Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (FIRMette 49035C0282H, effective 8/2/2012) shows the Alternative 1 site is located in Zone X, which FEMA defines as "0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile" (FEMA 2012). The 0.2% annual chance flood hazard area is commonly referred to as the 500-year floodplain. The FEMA FIRMette is shown in Figure 14l

3.5.1.2 Proposed Action – Alternative 2

3.5.1.2.1 Floodplains

The FEMA FIRMette panel 49035C0303G (effective 9/25/2009) shows the Alternative 2 site is located in an "Area of Minimal Flood Hazard, Zone X", which FEMA defines as a minimal risk area outside of the 100-year and 500-year floodplain (FEMA 2009a). The FEMA FIRMette is shown in Figure 15.

3.5.1.3 Proposed Action – Alternative 3

3.5.1.3.1 Floodplains

The FEMA FIRMette panel 49035C0284G (effective 9/25/2009) shows the Alternative 3 site is located in an "Area of Minimal Flood Hazard, Zone X", which FEMA defines as a minimal risk area outside of the 100-year and 500-year floodplain (FEMA 2009b). The FEMA FIRMette is shown in Figure 16.

3.5.1.4 Proposed Action – Alternative 4

3.5.1.4.1 Floodplains

The FEMA FIRMette panel 49035C0282H (effective 8/2/2012) shows the Alternative 4 site is located in Zone X, which FEMA defines as a "0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile" (FEMA 2012). Zone X is commonly referred to as the 500-year floodplain. The FEMA FIRMette is shown in Figure 17.

Figure 14. Alternative 1 – FEMA FIRMette Flood Map

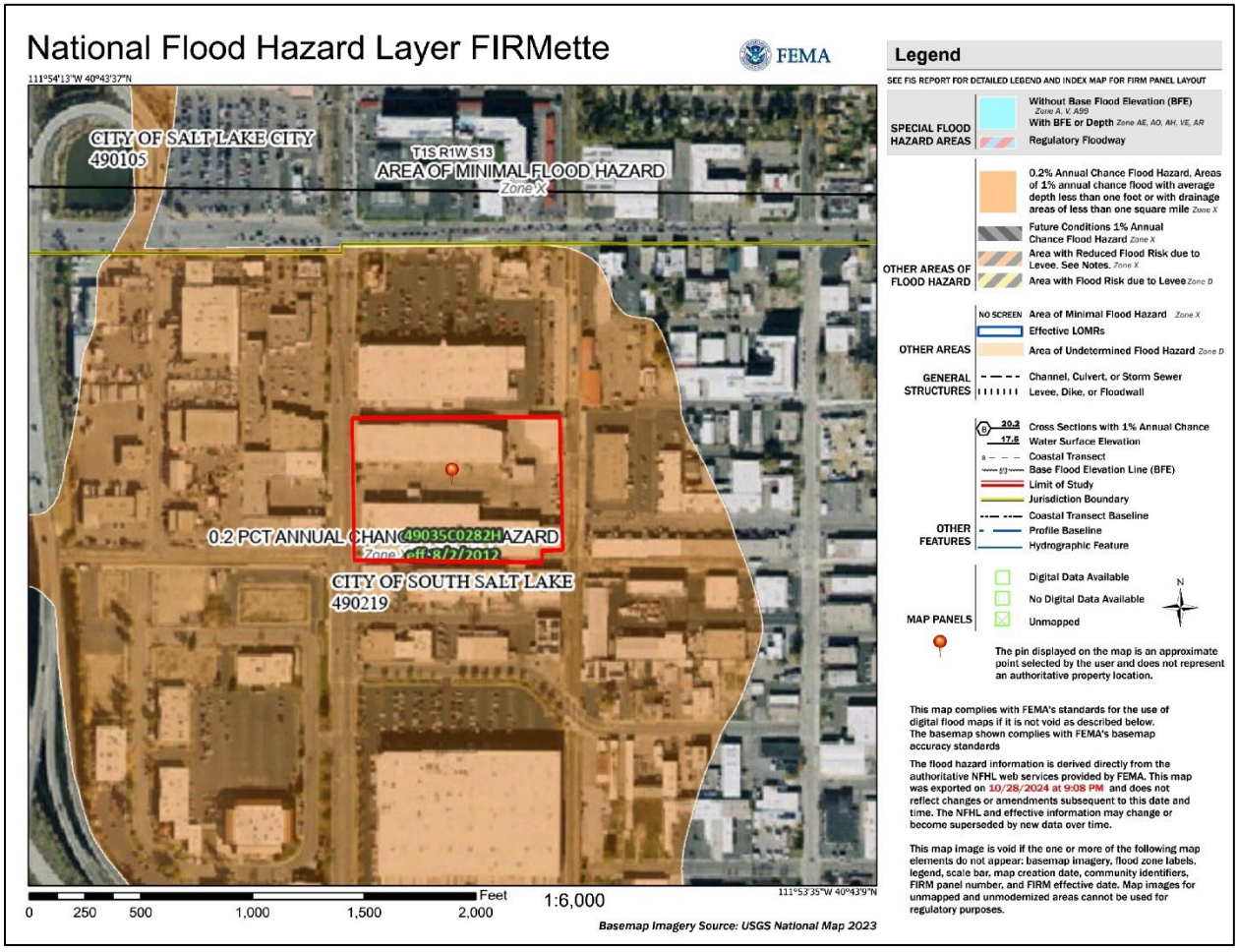


Figure 15. Alternative 2 – FEMA FIRMette Flood Map

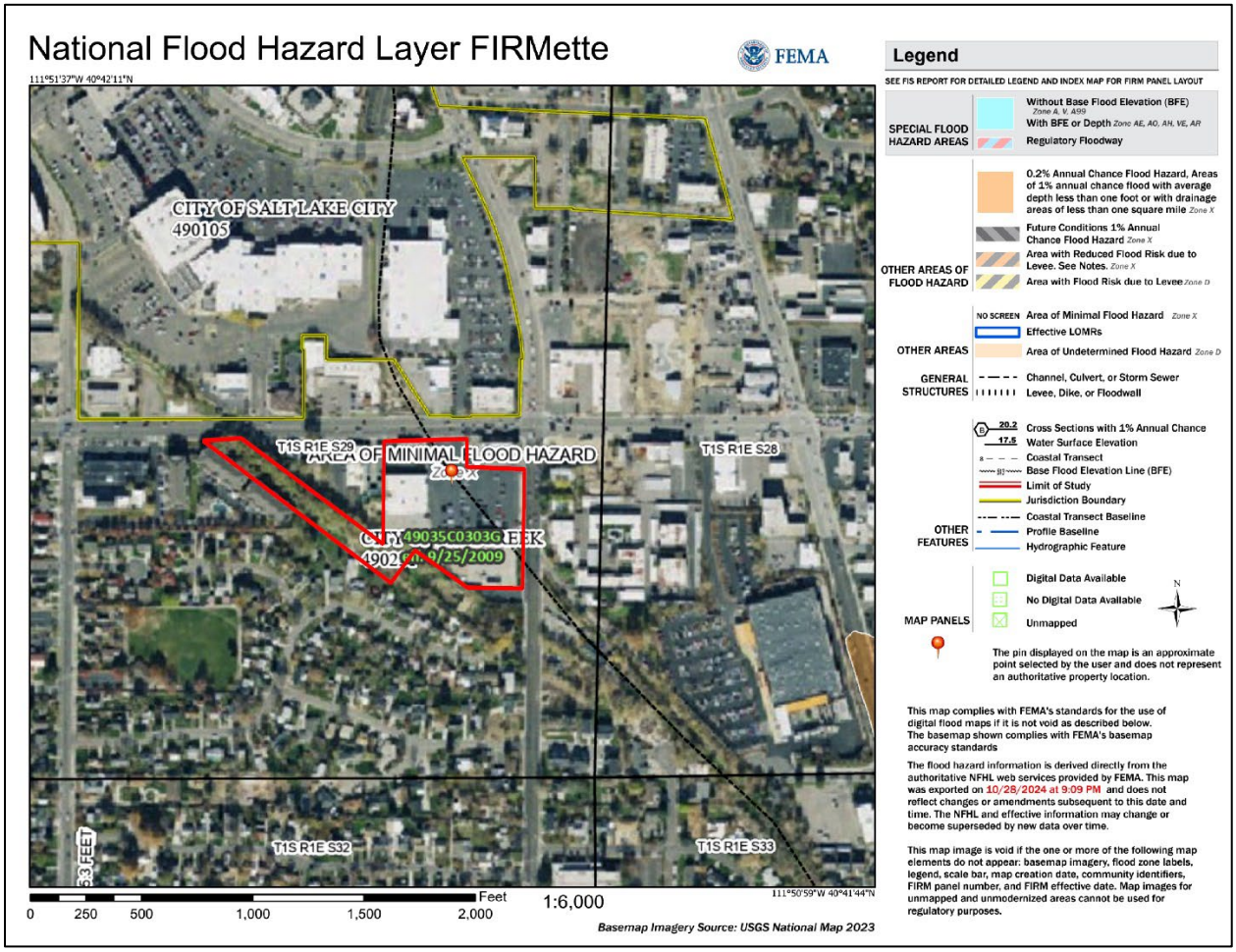


Figure 16. Alternative 3 – FEMA FIRMette Flood Map

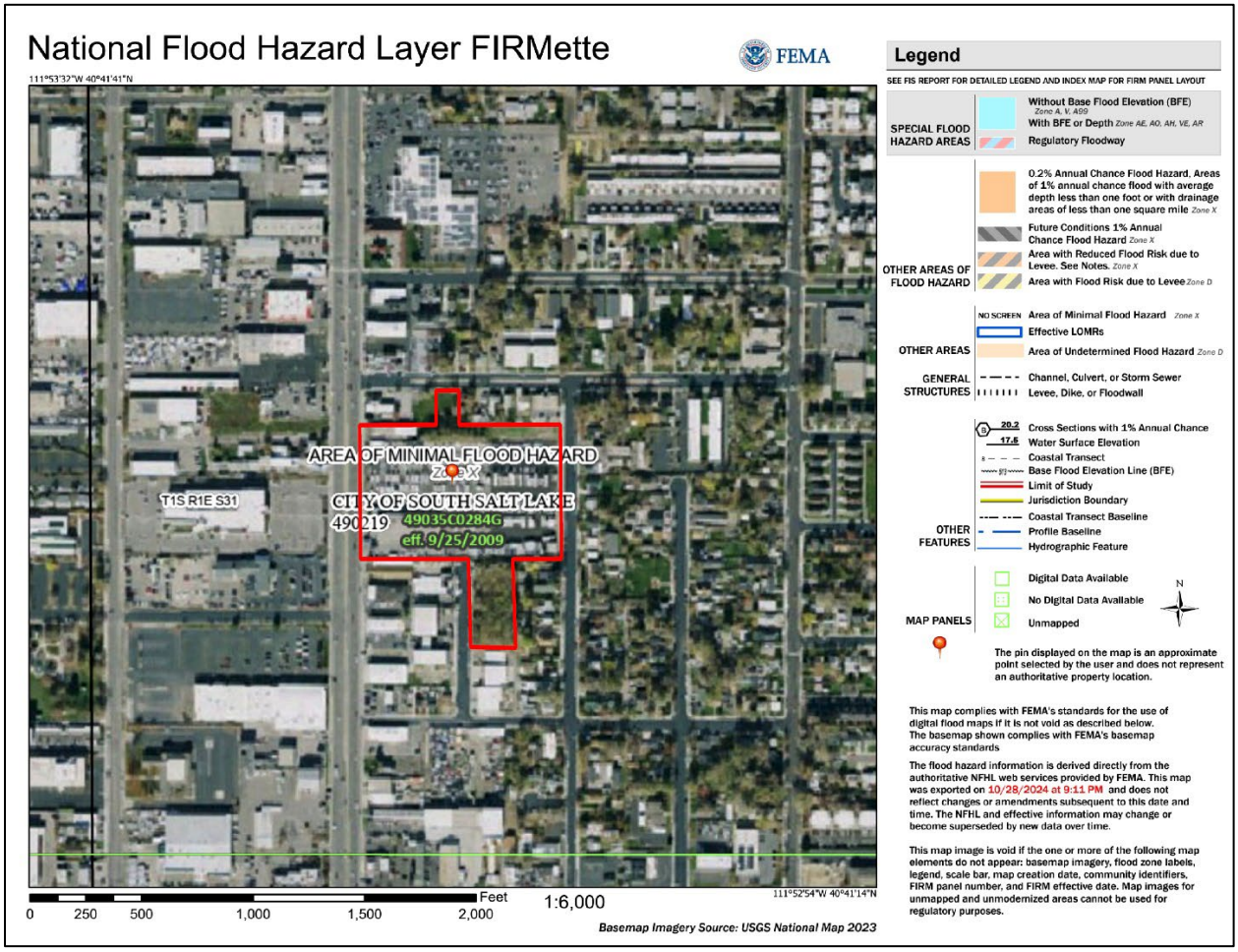
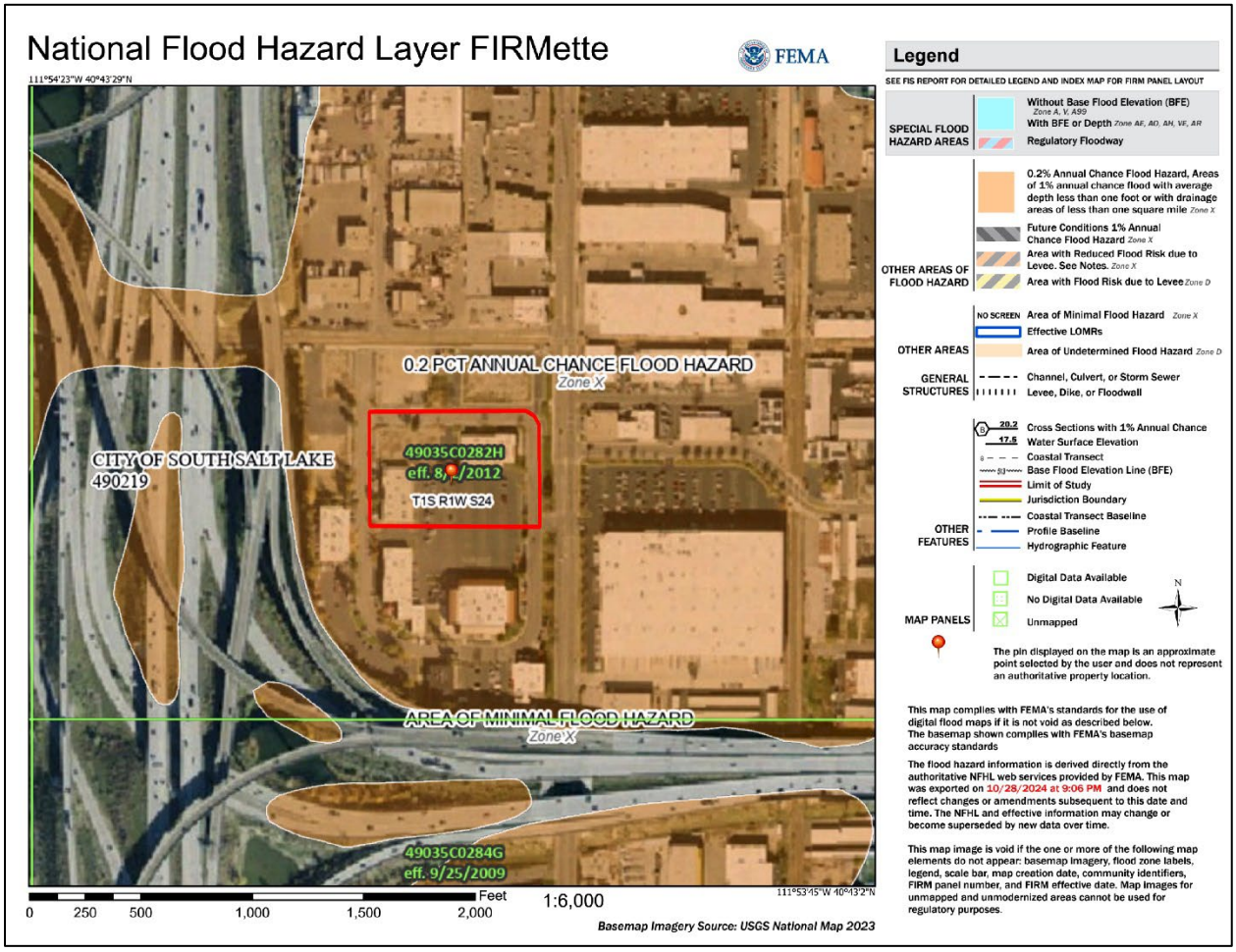


Figure 17. Alternative 4 – FEMA FIRMette Flood Map



3.5.1.5 Proposed Action – Alternatives 1, 2, 3, and 4

3.5.1.5.1 Coastal Zone

Salt Lake City is not located in a geographic region regulated under the Coastal Zone Management Act. Therefore, the Proposed Action under Alternatives 1, 2, 3, or 4 would have no impact on coastal zone resources. This topic does not require further analysis.

3.5.1.6 Proposed Action – Alternatives 1, 2, 3, and 4

3.5.1.6.1 Wetlands

The Alternative 1, 2, 3, and 4 sites are all developed and do not contain wetlands or other waters of the U.S. Therefore, the Proposed Action under Alternatives 1, 2, 3, or 4 would have no impact on wetlands. This topic does not require further analysis.

3.5.2 Environmental Consequences

3.5.2.1 Proposed Action – Alternatives 1 and 4

3.5.2.1.1 Floodplains

The Alternative 1 and 4 sites are located within the FEMA-mapped 500-year floodplain (0.2% Annual Chance Flood Hazard areas). VA does not designate an OPC as critical development and therefore the Proposed Action is not subject to Executive Order 11988—Floodplain Management. Additionally, the Salt Lake City floodplain hazard protection ordinance does not apply to development within the 500-year floodplain (Salt Lake City 2025).

The private entity would design the OPC to meet Green Globes certification. The Green Globes program encourages implementing flood-resilient design features, such as elevating mechanical systems or using flood-resistant materials, and using low-impact design techniques, such as bioswales and permeable paving, to help infiltrate stormwater generated at the site. However, the 500-year floodplain is several hundred acres. As a result, redevelopment of the Alternative 1 or 4 sites would not induce changes in floodplain hazards at the site or the surrounding properties.

Therefore, the construction and operation of the Proposed Action under Alternatives 1 or 4 would have a permanent, negligible adverse impact on floodplains.

3.5.2.2 Proposed Action – Alternatives 2 and 3

3.5.2.2.1 Floodplains

The Alternative 2 and 3 sites are both outside the FEMA-mapped 100- and 500-year floodplains.

Therefore, the construction and operation of the Proposed Action under Alternative 2 or 3 would have no impact on floodplains.

3.5.2.3 No Action Alternative

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

3.6 Cultural Resources and Historic Properties

Cultural resources include both archaeological and built environment elements. Historic properties are cultural resources that are eligible for or listed on the National Register of Historic Places (NRHP). 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 requires all federal agencies to assume responsibility for the preservation of historic properties under federal agency ownership or control.

3.6.1 Affected Environment

On December 10, 2024, VA emailed the SHPO 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. Section 5 of this EA provides more details about the public comment period. A detailed description of Section 106 consultation for each of the four Alternatives is provided in the following sections.

3.6.1.1 Proposed Action – Alternative 1

3.6.1.1.1 Initial Cultural Resource Impact Prediction Study

In February 2025, VA completed an Initial Cultural Resource Impact Prediction (ICRIP) study to assess the potential effects of the Proposed Action at the Alternative 1 site on the Area of Potential Effect (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 APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

The APE for Alternative 1 encompasses the site, plus a 150-foot buffer to the north and the adjacent streets/railroad tracks to the east, west, and south around the site to account for viewshed and other potential effects.

VA determined that there is one property eligible for the NRHP in the APE. The Park City Branch of the Denver & Rio Grande Western Railway (42SL416) is a previously identified historic era linear site, determined eligible under Criterion A. A segment of this historic site is located immediately south of the Alternative 1 site and is within the APE. Although this segment does contribute to historic site 42SL416, the Proposed Action/undertaking would have no adverse effect to the historic site, pursuant to 36 CFR 800.5(b).

3.6.1.1.2 Phase I Archaeological Survey

For the Alternative 1 site, VA's inventory resulted in the documentation of two archaeological sites and no isolated finds. One archaeological site was previously recorded, and one is newly identified. The newly documented archaeological site consists of the remnants of a historic period demolished building (commerce/trade site) (42SL1105) and is recommended not eligible for listing in the NRHP. The previously recorded archaeological site is the Denver & Rio Grande Western Railway (42SL416), which has previously been determined eligible for listing in the NRHP under Criterion A. Although the segment of 42SL416 intersecting the southern boundary of the Alternative 1 site has been replaced with modern light rail, the Phase I archaeological survey recommended the segment as contributing to the overall archaeological site's eligibility due to continuous use.

3.6.1.1.3 Section 106 Consultation

The Alternative 1 conceptual development plan shows that construction and operation of the OPC would entirely avoid the segment of the Denver & Rio Grande Western Railway located along the southern boundary of the Alternative 1 site. Based on the conceptual plan and the ICRIP and Phase I archaeological survey results, VA concluded that the Proposed Action/undertaking at the Alternative 1 site would result in no adverse effect to historic properties.

On June 10, 2025, pursuant to Section 106, VA initiated Section 106 consultation with the UT SHPO, Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation, Ute Indian Tribe of the Uintah & Ouray Reservation, South Salt Lake City Planning Commission, and Utah Historical Society, as required under NHPA. The Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation and Ute Indian Tribe of the Uintah & Ouray Reservation are federally recognized Indian tribes with ancestral ties to the area. The consultation included a copy of the ICRIP and Phase I archaeological survey and a finding that the Proposed Action/undertaking (Alternative 1) would result in no adverse effect to the historic site, pursuant to 36 CFR 800.5(b).

On June 18, 2025, the UT SHPO provided written concurrence with VA's determinations of eligibility and finding of effect 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 February 2025, VA completed an ICRIP study to assess the potential effects of the Proposed Action/undertaking at the Alternative 2 site on the APE. The APE for Alternative 2 encompasses the site limits plus a 150-foot buffer, as well as the steep ridge and adjacent drainage (that appears to have once been part of the Jordan and Salt Lake City Canal) along the south border of the site, Utah 171 to the north (four-lane divided highway), and South 1300 East (four-lane divided highway) to account for viewshed and other potential effects.

VA determined that there are no known NRHP-listed or eligible properties within the APE, and Alternative 2 would result in a finding of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

3.6.1.2.2 Phase I Archaeological Survey

VA's inventory resulted in the documentation of two archaeological sites and no isolated finds. One archaeological site was previously recorded, and one is newly identified. The newly documented archaeological site consists of a segment of an unnamed, secondary canal (agriculture/subsistence site) (42SL1106) and is recommended not eligible for listing in the NRHP. The previously recorded archaeological site is the Jordan and Salt Lake City Canal (42SL214), which has previously been determined eligible for listing in the NRHP under Criterion A. However, the segment of 42SL214 intersecting the Alternative 2 site was recommended non-contributing to the archaeological site's overall eligibility. The Phase I Archaeological survey recommended no further cultural resource work.

3.6.1.2.3 Section 106 Consultation

Based on the Alternative 2 ICRIP and Phase I archaeological survey results, VA concluded that the Proposed Action/undertaking at the Alternative 2 site would result in no historic properties affected.

On June 10, 2025, VA initiated Section 106 consultation with the UT SHPO, Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation and Ute Indian Tribe of the Uintah & Ouray Reservation, Millcreek Planning Commission, Millcreek Historic Preservation Commission, and the Utah Historical Society. The Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation and Ute Indian Tribe of the Uintah & Ouray Reservation are federally recognized Indian tribes with ancestral ties to the area. The consultation included a copy of the ICRIP and Phase I archaeological survey and a finding that the Proposed Action/undertaking would result in no historic properties affected, pursuant to 36 CFR Part 800.4(d)(1).

On June 17, 2025, the UT SHPO provided written concurrence with VA's determinations of eligibility and finding of effect for Alternative 2. Copies of Section 106 consultation correspondence are included in Appendix B.

3.6.1.3 Proposed Action – Alternative 3

3.6.1.3.1 Initial Cultural Resource Impact Prediction Study

In February 2025, VA completed an ICRIP study to assess the potential effects of the Proposed Action/undertaking at the Alternative 3 site on the APE. The APE for Alternative 3 encompasses the site plus a 150-foot buffer to the north, south, and east, and US Highway 89 (six-lane divided highway) to the west to account for viewshed and other potential effects.

VA determined that there are no known NRHP listed or eligible properties within the APE, and Alternative 3 would result in a finding of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

3.6.1.3.2 Phase I Archaeological Survey

VA's inventory did not result in the documentation of any archaeological sites or isolated finds at the Alternative 3 site. The Phase I Archaeological survey recommended no further cultural resource work.

3.6.1.3.3 Section 106 Consultation

Based on the ICRIP and Phase I archaeological survey results, VA concluded that the Proposed Action/undertaking at the Alternative 3 site would result in no historic properties affected.

On June 10, 2025, VA initiated Section 106 consultation with the UT SHPO, Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation and Ute Indian Tribe of the Uintah & Ouray Reservation, South Salt Lake City Planning Commission, and Utah Historical Society, as required under NHPA. The Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation and Ute Indian Tribe of the Uintah & Ouray Reservation are federally recognized Indian tribes with ancestral ties to the area. The consultation included a copy of the ICRIP and Phase I archaeological survey and a finding that the Proposed Action/undertaking would result in no historic properties affected pursuant to 36 CFR Part 800.4(d)(1).

On June 17, 2025, the UT SHPO provided written concurrence with VA's finding of effect for Alternative 3. Copies of Section 106 consultation correspondence are included in Appendix B.

3.6.1.4 Proposed Action – Alternative 4

3.6.1.4.1 Initial Cultural Resource Impact Prediction Study

In February 2025, VA completed an ICRIP study to assess the potential effects of the Proposed Action/undertaking at the Alternative 4 site on the APE. The APE for Alternative 4 encompasses the site limits plus a 150-foot buffer to the north, south, and west, and South 300 West (five-lane divided highway) to the east to account for viewshed and other potential effects.

VA determined that there are no known NRHP listed or eligible properties within the APE, and Alternative 4 would result in a finding of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

3.6.1.4.2 Phase I Archaeological Survey

VA's inventory did not result in the documentation of any archaeological sites or isolated finds at the Alternative 4 site. The Phase I Archaeological survey recommended no further cultural resource work.

3.6.1.4.3 Section 106 Consultation

Based on the ICRIP and Phase I archaeological survey results, VA concluded that Proposed Action/undertaking Alternative 4 would result in no historic properties affected at the Alternative 4 site.

On June 10, 2025, VA initiated Section 106 consultation with the UT SHPO, Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation and Ute Indian Tribe of the

Uintah & Ouray Reservation, South Salt Lake City Planning Commission, and Utah Historical Society, as required under NHPA. The Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation and Ute Indian Tribe of the Uintah & Ouray Reservation are federally recognized Indian tribes with ancestral ties to the area. The consultation included a copy of the ICRIP and Phase I archaeological survey and a finding that the Proposed Action/undertaking would result in no historic properties affected, pursuant to 36 CFR Part 800.4(d)(1).

On June 17, 2025, the UT SHPO provided written concurrence with VA's finding of effect for Alternative 4. Copies of Section 106 consultation correspondence are included in Appendix B.

3.6.2 Environmental Consequences

3.6.2.1 Proposed Action – Alternatives 1

As previously described in Section 3.6.1.1.3, VA and the SHPO concluded that Alternative 1 would result in no adverse effect to the historic site, pursuant to 36 CFR 800.5(b).

3.6.2.2 Proposed Action – Alternatives 2, 3, and 4

As previously described, VA and the SHPO concluded that Alternative 2, 3, or 4, would result in no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

3.6.2.3 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at any of the Alternative 1, 2, 3, or 4 sites. Therefore, the No Action alternative would result in no effect on cultural resources or 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 refers 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 1, 2, 3, and 4

3.7.1.1.1 Geology

The Salt Lake City metropolitan area, which encompasses South Salt Lake and Millcreek, are primarily located within the Basin and Range Physiographic Province, with the Wasatch Range, subrange of the Rocky Mountains, bordering the city to the east. The area sits in the Salt Lake Valley, which is a basin characteristic of the Basin and Range region. The Oquirrh Mountains are also nearby, to the west (Utah Geological Survey 2000).

The USGS Sugar House quadrille map shows the depth to bedrock underlying the Alternative 1, 2, 3, and 4 sites ranges from approximately 200- to 400-feet below grade (USGS 1974).

The Utah Geological Survey states that the Wasatch fault zone trends north-south through the Wasatch Front and is divided into 10 segments, including the Salt Lake City segment. Geologic evidence indicates that the Salt Lake City segment generates large earthquakes (approximately magnitude 7) on average

every 1,350 years, the most recent having been approximately 1,300 years ago (Utah Geological Survey 2003).

3.7.1.2 Proposed Action – Alternative 1

3.7.1.2.1 Soils

The National Resource Conservation Service (NRCS) mapping shows urban land is the only mapped soil type present at the Alternative 1 site, as depicted on Figure 18. Soil classified as urban land has been significantly altered by human activity, leading to changes in drainage characteristics. Urban land soils typically have very slow infiltration and high runoff potential due to compacted soils and impervious surfaces. All of the soil at the Alternative 1 site is covered with impervious surfaces. The NRCS features for this soil are listed in Table 6.

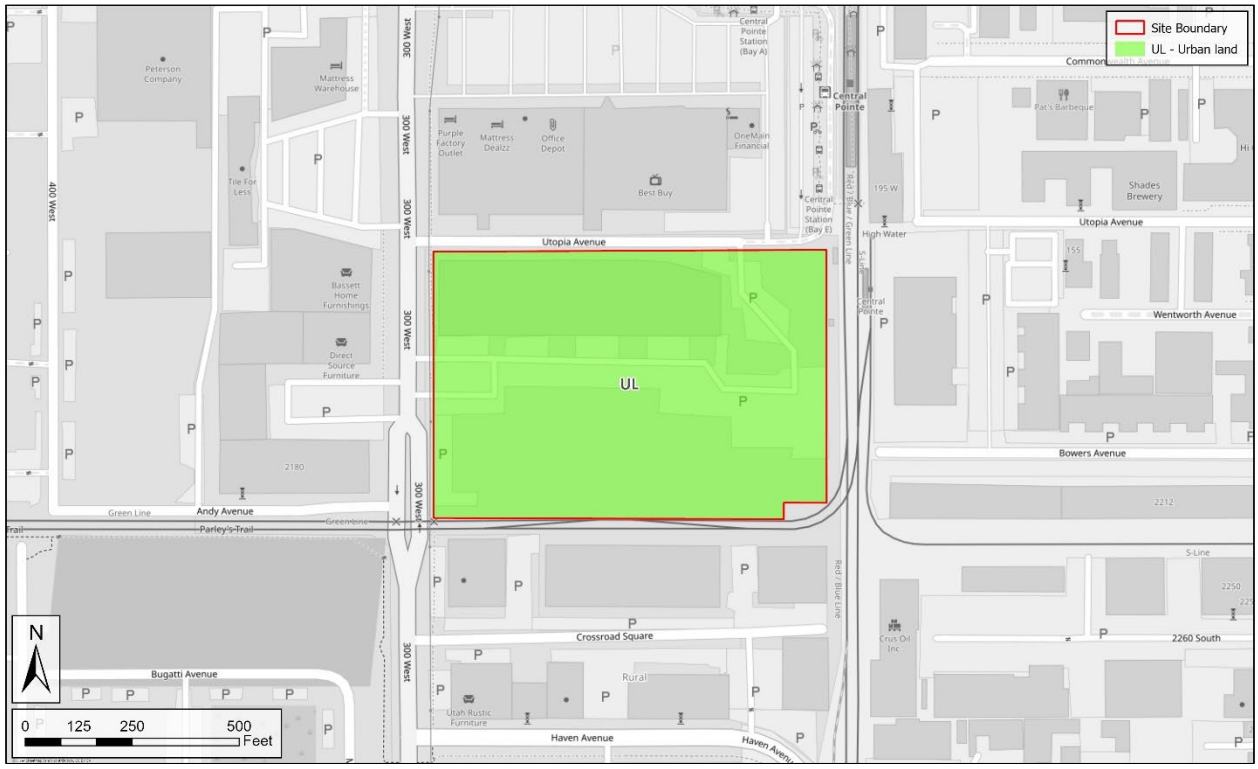
3.7.1.2.2 Prime Farmland

The Farmland Protection Policy Act requires federal agencies to assess the potential impact on agricultural land before approving a project that might convert prime farmland to non-agricultural use. NRCS does not classify urban land as prime farmland, as shown in Table 6.

Table 6. Alternative 1 – NRCS Mapped Soil Characteristics

Soil Name	Drainage Classification	Prime Farmland	Acres (approximate)	Percent of Site
Urban Land	Not classified	Not prime farmland	8	100%

Figure 18. Alternative 1 – NRCS Mapped Soil



3.7.1.3 Proposed Action – Alternative 2

3.7.1.3.1 Soils

The NRCS mapping shows two soil types at the Alternative 2 site, as depicted on Figure 19. The NRCS features for these soils are listed in Table 7. All of the soils at the site are covered with impervious surfaces. The stony terrace escarpment is covered with an asphalt access drive and steeply sloping shoulder to the west, and the Taylorsville silty clay loam is covered with buildings and an asphalt-paved parking lot.

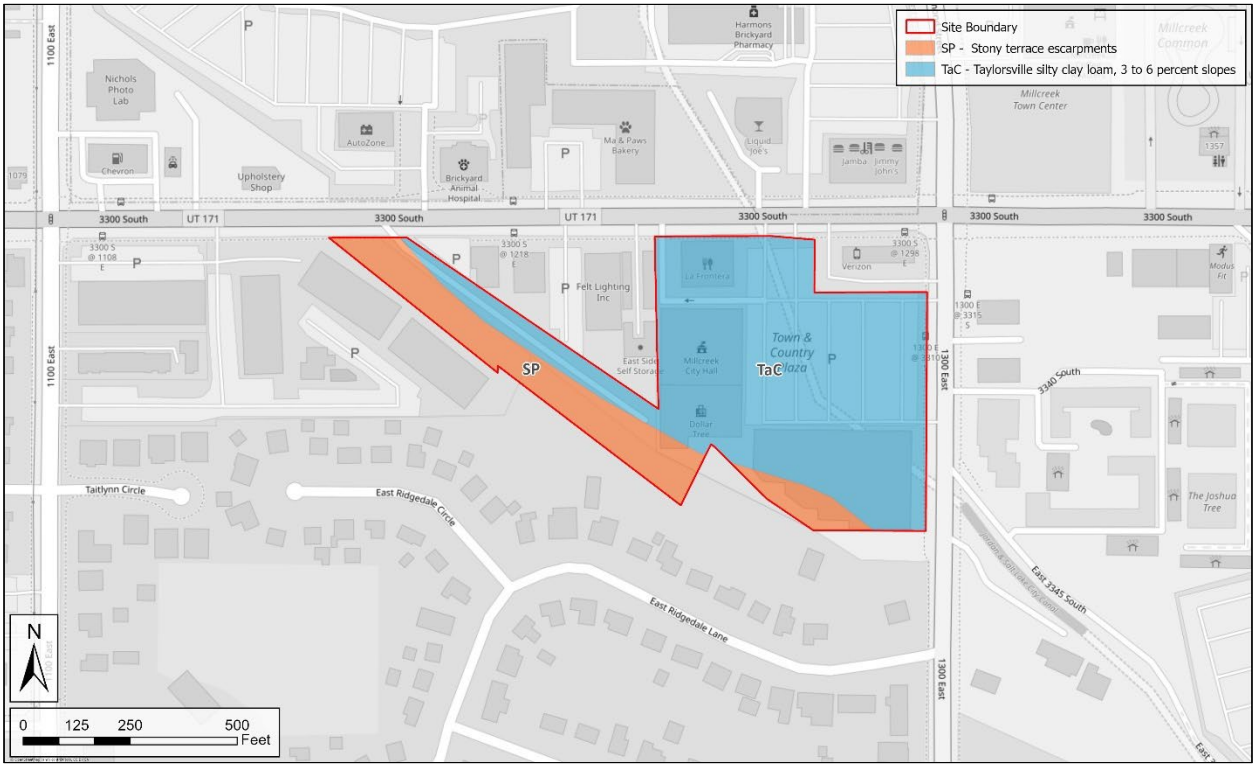
3.7.1.3.2 Prime Farmland

As shown on Table 7, NRCS classifies the Taylorsville silty clay loam as prime farmland if irrigated. However, the site and the surrounding area is urban and absent of agricultural production.

Table 7. Alternative 2 – NRCS Mapped Soil Characteristics

Soil Name	Drainage Classification	Prime Farmland	Acres (approximate)	Percent in Site
Stony terrace escarpments	Not classified	Not prime farmland	1.3	22%
Taylorsville silty clay loam, 3 to 6 percent slopes	Well drained	Prime farmland if irrigated	4.7	78%

Figure 19. Alternative 2 – NRCS Mapped Soils



3.7.1.4 Proposed Action – Alternative 3

3.7.1.4.1 Soils

The NRCS map shows one soil type, Welby silt loam, is present at the Alternative 3 site, as depicted on Figure 20. The NRCS features for the soil are listed in Table 8. Impervious surfaces (buildings, parking lots) cover approximately 7 acres of soil at the site, while approximately 0.5 acres to the north and 1 acre to the south are vegetated.

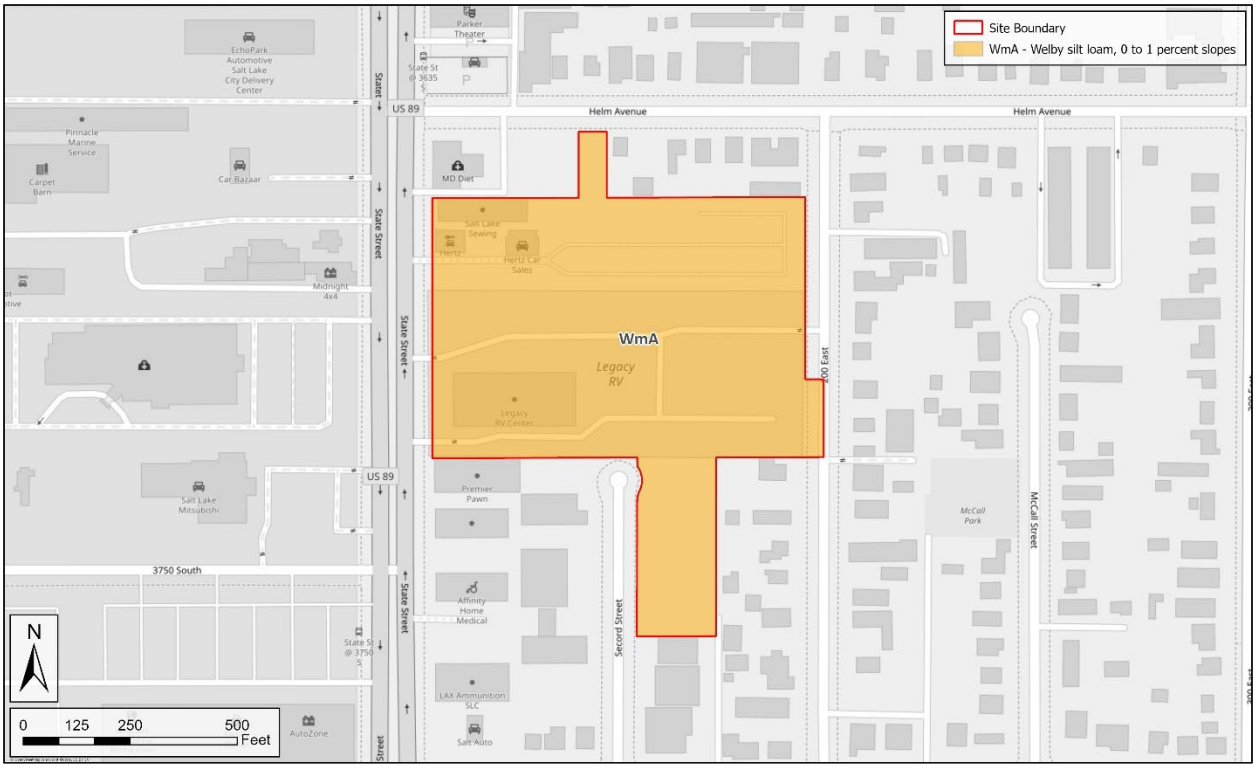
3.7.1.4.2 Prime Farmland

As shown in Table 8, NRCS classifies Welby silt loam as prime farmland if irrigated. However, the site and the surrounding area is urban and absent of agricultural production.

Table 8. Alternative 3 – NRCS Mapped Soil Characteristics

Soil Name	Drainage Classification	Prime Farmland	Acres (approximate)	Percent in Site
Welby silt loam, 0 to 1 percent slopes	Well drained	Prime farmland if irrigated	8.4	100

Figure 20. Alternative 3 – NRCS Mapped Soil



3.7.1.5 Proposed Action – Alternative 4

3.7.1.5.1 Soils

The NRCS map shows one soil type, urban land, is present at the Alternative 4 site, as depicted on Figure 21. Urban land soils typically have very slow infiltration and high runoff potential due to compacted soils

and impervious surfaces. All of the soil at the Alternative 4 site is covered with impervious surfaces or previously disturbed. The NRCS features for this soil are listed in Table 9.

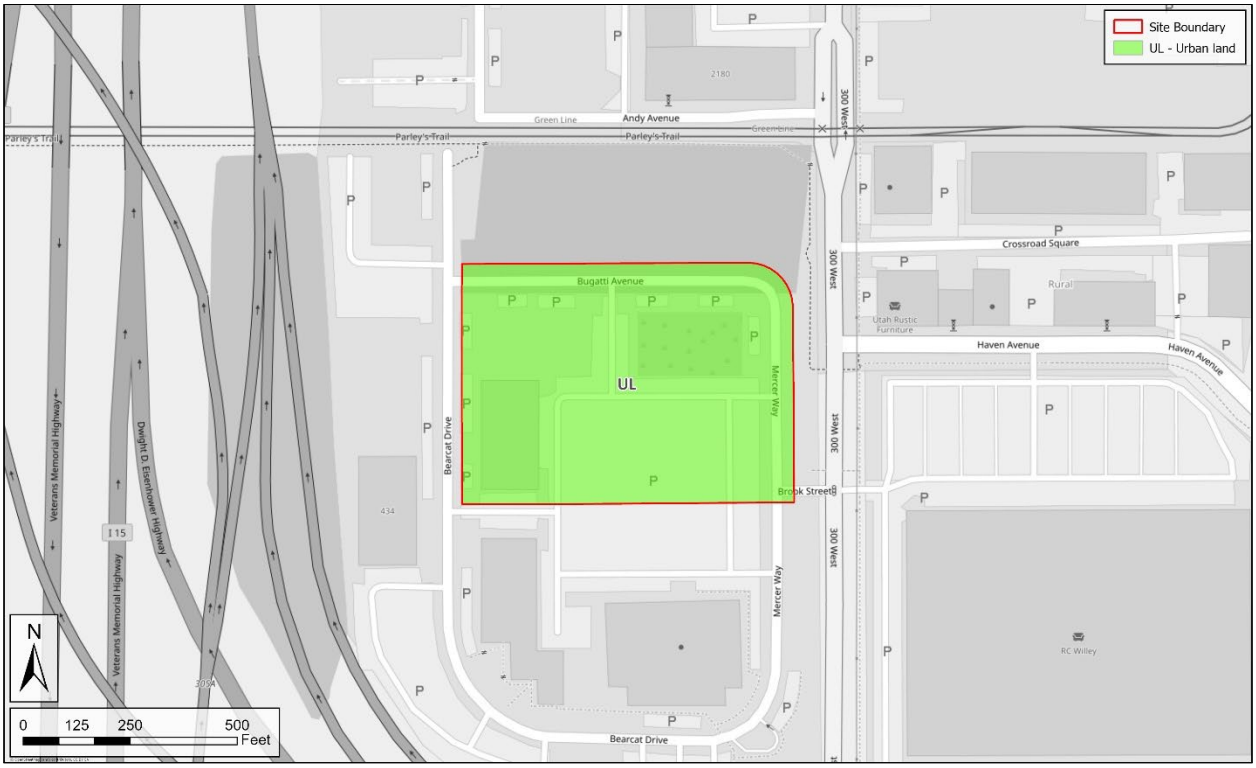
3.7.1.5.2 Prime Farmland

As shown in Table 9, NRCS does not classify the urban land as prime farmland.

Table 9. Alternative 4 - NRCS Mapped Soil Characteristics

Soil Name	Drainage Classification	Prime Farmland	Acres	Percent in Site
Urban Land	Not classified	Not prime farmland	5.7	100.00%

Figure 21. Alternative 4 – NRCS Mapped Soil



3.7.2 Environmental Consequences

3.7.2.1 Proposed Action – Alternatives 1, 2, 3, and 4

3.7.2.1.1 Construction

3.7.2.1.1.1 Geology

Under Alternatives 1, 2, 3, or 4, construction activities are not anticipated to contract bedrock. Therefore, construction of any one of Proposed Action Alternatives 1, 2, 3, or 4 would have no impact on geological resources. The private entity would design and construct the OPC development according to applicable seismic design requirements per VA, International Building Code, and Greater Salt Lake Municipal Services District criteria.

3.7.2.1.1.2 Soils

Under Alternatives 1, 2, 3, or 4, construction activities would require land clearing and grading, which exposes soils and could make them susceptible to erosion by wind and surface water runoff.

Operators of construction activities resulting in land disturbance equal to or greater than one acre are required to obtain coverage under the UT DEQ Utah Pollutant Discharge Elimination System (UPDES) General Construction Stormwater Permit (UT DEQ 2024). The UPDES is Utah's version of the National Pollutant Discharge Elimination System (NPDES). UPDES a permit system mandated by the Clean Water Act to control pollutants discharged into Utah's waters. UPDES permits are required for various facilities, including industrial, municipal, and construction sites, to regulate wastewater and stormwater discharges.

To minimize soil erosion during the construction phase of the Proposed Action, the private entity would be responsible for implementing and maintaining the UPDES permit-required BMP specified in *Best Management Practices for Construction Sites* (UT DEQ 2024), which include but are not limited to:

- Installing and maintaining sedimentation and erosion control measures, including silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, synthetic hay bales, rip-rap, and/or similar physical control structures.
- Retaining on-site vegetation to the maximum extent possible.
- Revegetating disturbed areas with native, non-invasive vegetation as soon as construction is completed.

To minimize the potential impact of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality, the private entity would implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site and train workers on the proper use of the equipment. Releases of regulated quantities of petroleum-based fluids would be reported to VA and UT DEQ and cleaned up per UT DEQ regulatory requirements.

Therefore, the construction of the Proposed Action under Alternative 1, 2, 3, or 4, would have a temporary, minor adverse impact on soil quality.

3.7.2.1.1.3 Prime Farmland

The U.S. Department of Agriculture (USDA) Farmland Conversion Impact Rating Form AD-1006 is not required for urban sites where the land is already considered "urban built-up" according to the US Census Bureau. The form is specifically designed to assess the potential impact of converting farmland to non-agricultural uses. Because the prime farmland at the Alternative 2 and 3 sites is already designated as urban, it is not considered farmland and therefore the AD-1006 form is not required (49 CFR 658).

Therefore, the construction of the Proposed Action under Alternatives 1, 2, 3, or 4, would have no impact on prime farmland soils.

3.7.2.1.2 Operation

During operation of any one of the Alternatives for Site 1, 2, 3, or 4, the potential for soil erosion would be minimized because structures, asphalt/paving, or landscaping would cover soils previously exposed during the construction phase. The private entity would ensure that any permanent stormwater management facilities installed 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 Alternative 1, 2, 3, or 4 would have no impact on soil quality.

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 have no impact on soil quality.

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

Salt Lake County's hydrology is defined by its location within the Great Basin, a region with no outlet to the ocean, and by the presence of the Great Salt Lake (Utah Geological Survey 2025). The county's water sources include snowmelt from the Wasatch Mountains, surface water from rivers and streams, and groundwater. The Great Salt Lake, a terminal lake, plays a significant role, influencing local precipitation and serving as a major endpoint for surface water.

All of the drinking water in Salt Lake County comes from either groundwater sources or from the Wasatch creeks that flow down into the valley (USU 2025). South Salt Lake water is groundwater and must be pumped from wells. South Salt Lake also receives water from Jordan Valley Water Conservancy District (JVWCD) to supplement its supply. Because of Salt Lake County land annexations in the past, some residents receive their water from either Salt Lake City or the Jordan Valley Water Conservancy District and are subject to their utility service rules and fees. Millcreek is primarily served by Salt Lake City's Public Utilities and uses groundwater aquifer wells managed locally and via JVWCD to supplement its supply during high demand or drought.

3.8.1.1 Proposed Action – Alternatives 1, 2, 3, and 4

3.8.1.1.1 Surface Water Features

There are no surface water features at any of the Alternative sites.

3.8.1.1.2 Groundwater Characteristics

The depth to groundwater in three monitoring wells within a two-mile radius of the Alternative 1, 2, 3, and 4 sites ranged from approximately 5- to 25-feet below ground surface (USGS 2025). Groundwater was encountered at approximately 9-feet below ground during a site investigation in 2024 at the Alternative 3 site.

3.8.1.1.3 Water Quality Conditions

Watersheds, or drainage basins, are areas of land that drain into rivers or bodies of water.

USGS shows the Alternative 1 and 4 sites are located within the Parleys Creek-Jordan River subwatershed (hydrologic unit code [HUC] 12 - 160202040405) and Alternatives 2 and 3 are withing the Outlet Millcreek subwatershed (HUC 12 – 160202040305) (USGS 2025).

3.8.2 Environmental Consequences

3.8.2.1 Proposed Action – Alternatives 1, 2, 3, and 4

3.8.2.1.1 Construction

Under Alternatives 1, 2, 3, or 4, construction of the Proposed Action would require regrading the site to create on-site drainage patterns that direct surface water runoff to newly constructed stormwater management control features, which would ultimately discharge into the municipal stormwater system.

During the construction phase, grading and site reconfiguration may disrupt existing stormwater runoff drainage patterns that could lead to off-site stormwater discharge. Additionally, the use of construction equipment could lead to accidental releases of petroleum-based fluids, posing a contamination risk to the underlying groundwater.

To minimize adverse impacts to hydrologic and water quality conditions from construction activities, the selected private entity would obtain the UDEQ UPDES General Construction Stormwater permit and implement and maintain permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement a Spill Prevention, Control, and Countermeasure (SPCC) plan and train workers on how to respond to and remediate accidental releases of petroleum-based fluids to prevent impacts to groundwater.

Therefore, construction of any one of Proposed Action Alternatives 1, 2, 3, or 4 would have a temporary, negligible adverse impact on hydrology and water quality.

3.8.2.1.2 Operation

Under Alternative 1, 2, 3, or 4, the conceptual designs for the OPC development include small areas of landscaped vegetated grounds that would increase the pervious surface area of the site compared to existing conditions. Stormwater runoff from impervious areas, including the OPC and parking lots, would be discharged to the Salt Lake City municipal storm sewers.

Stormwater run-off from the site during operation of any one of the Action Alternatives may contain oils, grease, heavy metals, and other contaminants associated with vehicular traffic and maintenance activities.

To reduce potential stormwater runoff impacts on hydrology and water quality, the Proposed Action would include an operational stormwater management system (installed during the construction phase) to minimize sedimentation and runoff discharge. The stormwater management systems may include oil-water separators in parking lot drainage systems to capture petroleum-based fluids and other contaminants, stormwater infiltration systems with liners or pre-treatment measures to mitigate the risk of contaminant migration into groundwater, or advanced stormwater controls such as detention basins, rain gardens, and permeable pavement to reduce runoff and encourage infiltration.

Therefore, the operation of the Proposed Action under Alternatives 1, 2, 3, or 4 would 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 result in 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.

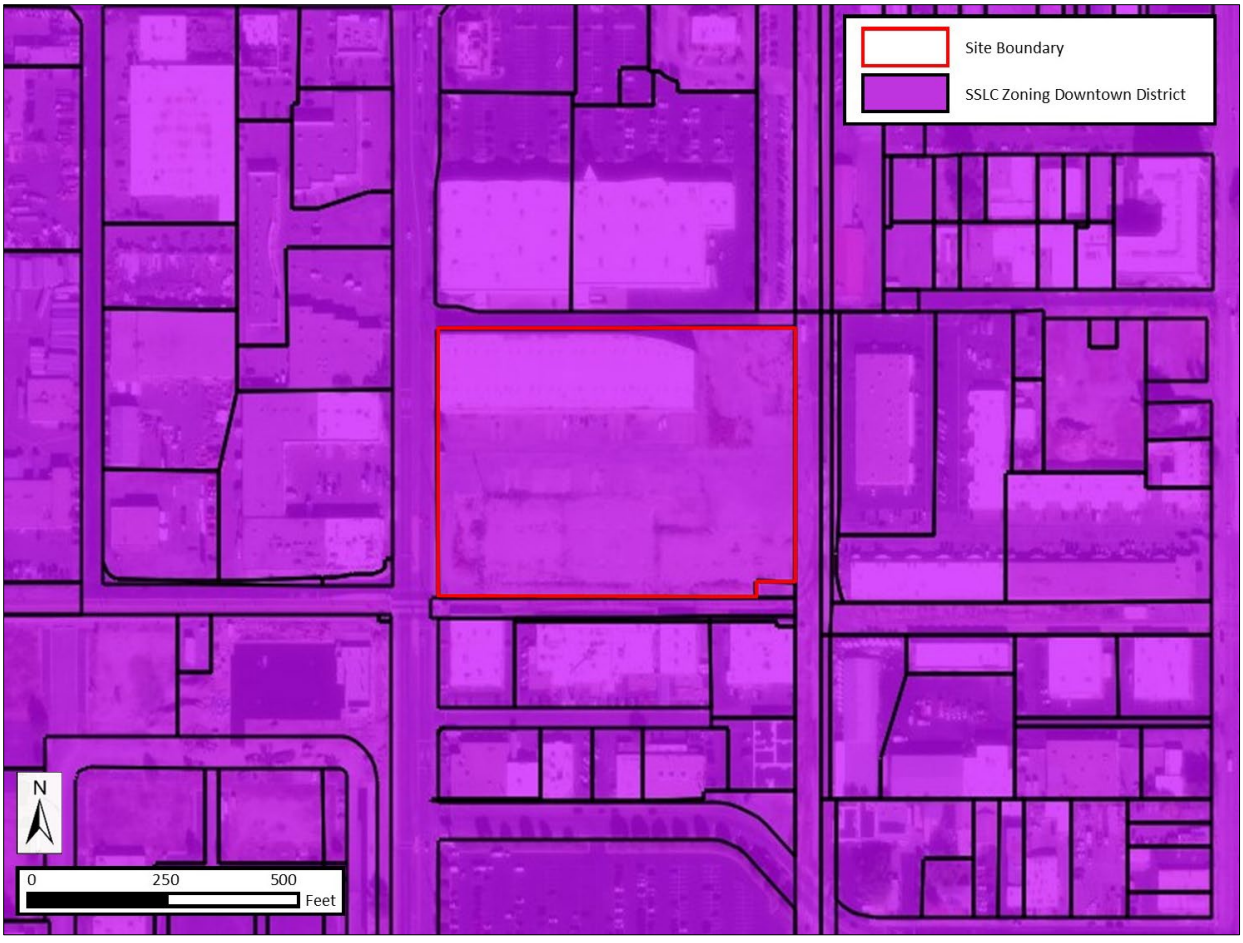
3.9.1 Affected Environment

3.9.1.1 Proposed Action – Alternative 1

The Alternative 1 site is located in the "Downtown South Salt Lake Master-Planned, Mixed-Use District" (South Salt Lake 2024) (Figure 22). This district was established by the South Salt Lake City to "facilitate the redevelopment of Downtown South Salt Lake as a regional Mixed-Use center in a manner Compatible with the South Salt Lake City General Plan and the Downtown South Salt Lake Master Plan. Redevelopment in this district is intended to transform the existing Streetscape into a walkable, urban place to serve as a City center of the community" (SSLC 2025).

The surrounding land use is commercial and heavily developed with no residential areas in the vicinity of the site.

Figure 22. Alternative 1 – Zoning Map

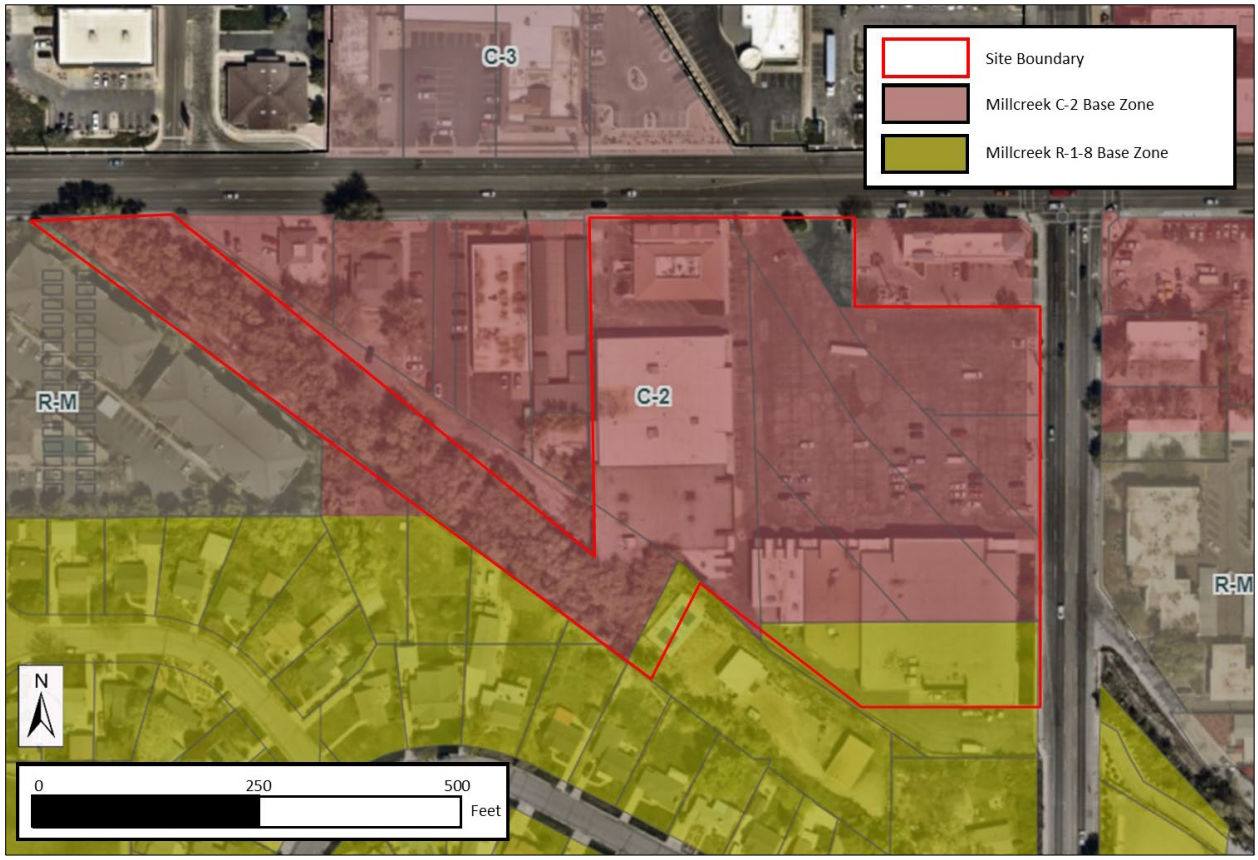


3.9.1.2 Proposed Action – Alternative 2

The Alternative 2 site is zoned by the City of Millcreek as C-2 (Community Commercial) (Figure 23). The southeastern portion of the site is zoned as R-1-8, which Millcreek defines as residential: single family dwellings. The purpose of the C-2 Commercial Zone is to provide areas for larger-scale community commercial development. Such zones cater to regional markets and generate traffic from a much larger regional area (Millcreek 2024). Surrounding land use to the north and east of the site is predominantly commercial and developed with retail stores and accompanying parking lots. Land use to the south of the site is predominantly residential.

Although the southern portion of the site is zoned for residential use, it is improved with buildings for commercial use.

Figure 23. Alternative 2 – Zoning Map

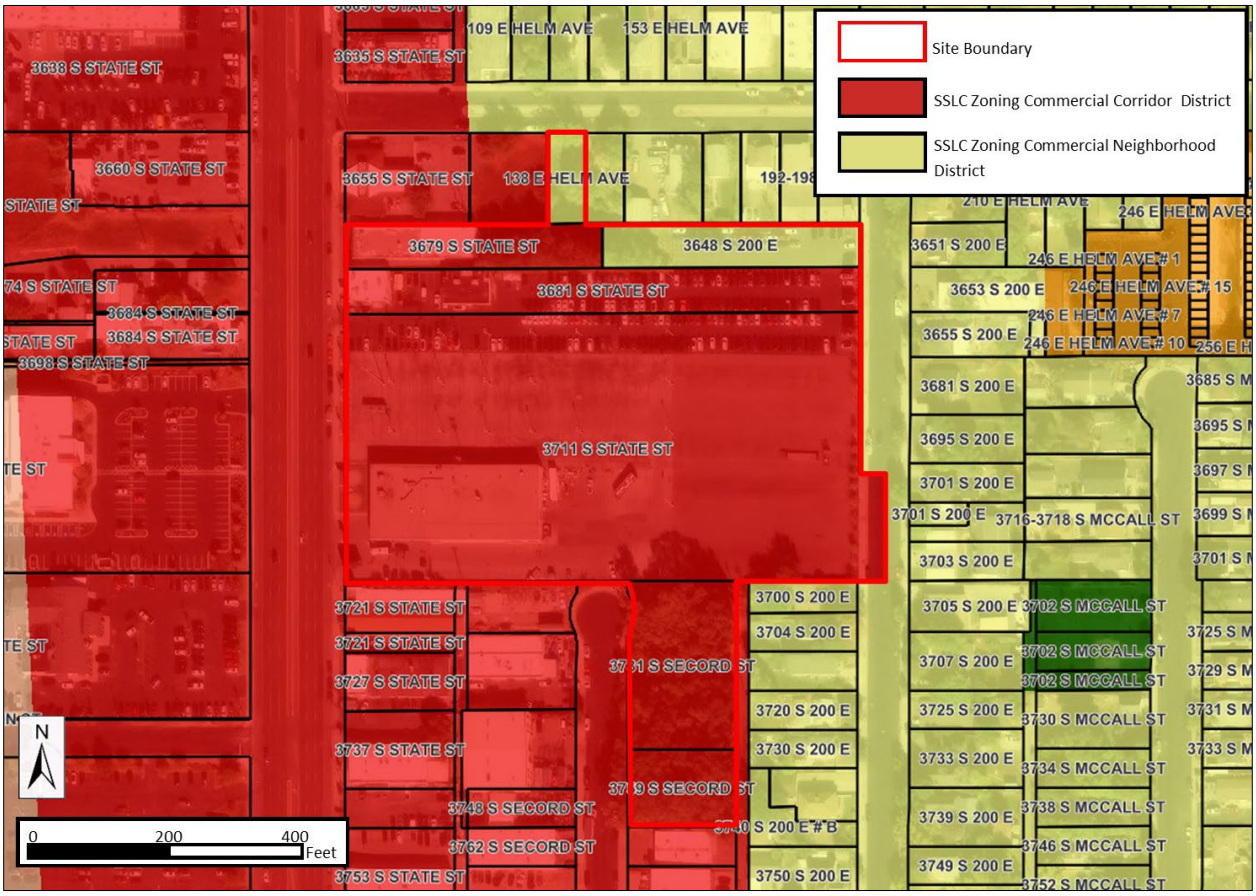


3.9.1.3 Proposed Action – Alternative 3

The Alternative 3 site is zoned by the City of South Salt Lake as a Commercial Corridor (South Salt Lake 2024) (Figure 24). This designation is established to allow for retail businesses and related uses to be grouped together along the city's principle arterial transportation corridors. The city promotes development that will enhance the corridor through architecture and site design standards (Utah 2019).

The surrounding land use is densely developed with a mix of residential and commercial land uses.

Figure 24. Alternative 3 – Zoning Map

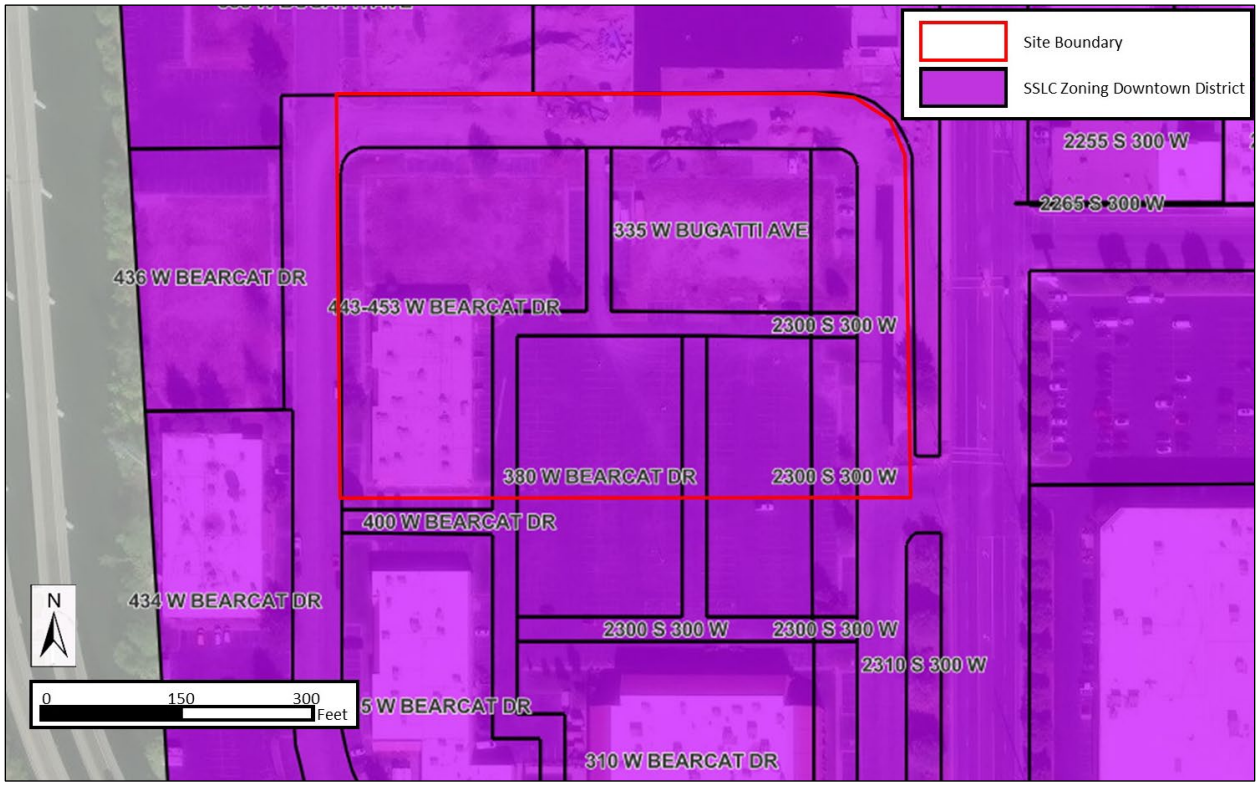


3.9.1.4 Proposed Action – Alternative 4

The Alternative 4 site is zoned by the City of South Salt Lake as DT (Downtown District) (South Salt Lake 2024) (Figure 25). This designation is established to facilitate the redevelopment of Downtown South Salt Lake as a regional mixed-use center in a manner compatible with the Wasatch Choice for 2040 Regional Growth Principles, the South Salt Lake City General Plan, and the Downtown South Salt Lake Master Plan. Redevelopment in this district is intended to transform it into a walkable, urban place to serve as a city center (Utah 2019).

The surrounding land use is commercial and heavily developed with no residential areas in the vicinity of the site.

Figure 25. Alternative 4 – Zoning Map



3.9.2 Environmental Consequences

3.9.2.1 Proposed Action – Alternatives 1, 2, 3, and 4

The construction and operation of the Proposed Action under Alternatives 1, 2, 3, or 4 would be consistent with the zoning established by the City of Salt Lake (Alternatives 1, 3, and 4) or the City of Millcreek (Alternative 2). The Proposed Action would not conflict with zoning or land uses at properties adjacent to the site.

Therefore, the construction and operation of the Proposed Action under Alternatives 1, 2, 3, or 4 would have no impact on land use or zoning.

3.9.2.2 No Action

Under the No Action alternative, there would be no change to existing conditions or land uses at the sites. Therefore, the No Action alternative would result in no impact on land use.

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 considered to be 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 10 details the predicted noise levels (at a distance of 50 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 10 (OSHA 2022).

Table 10. Predicted Noise Levels for Construction Equipment

Construction Equipment	Predicted Noise Level at 50 feet (dBA)
Concrete Saw	90
Jackhammer	89
Grader	85
Trailer/Loader/Backhoe	84
Roller	80
Crane	81
Paver	77
Dump Truck	76

Table 11. Common Sound Levels

Source	Decibel Level (dBA)
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

Salt Lake City prohibits excessive noise, such as noises that construction equipment could generate, between 9 p.m. and 7 a.m., and 9 p.m. to 9 a.m. on Sunday (Salt Lake City 2025). This regulation is applicable in South Salt Lake and Millcreek.

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 – Alternative 1

The current soundscape and vibration conditions in the area surrounding the Alternative 1 site are typical of a commercial district. The soundscape is influenced by vehicles travelling on South 300 West and on TRAX light rail tracks which border the site to the south and east. The site is located approximately 1,300 feet from the Veterans Memorials Highway (I-15) and Dwight D. Eisenhower Highway (I-80) interchange. A retail shopping plaza with a large parking lot is located to the north of the site, on the northern side of West Utopia Avenue, and commercial development surrounds the site on all sides. The nearest sensitive receptors are residences on Richards Street, with the nearest residence located approximately 1,025 feet to the northeast, and the Wasatch Front Baptist Church, located 0.25 miles northeast of the site. No other sensitive receptors are located within 0.25 miles of the site.

3.10.3.2 Proposed Action – Alternative 2

The soundscape and vibration conditions at the Alternative 2 site are typical of a mixed commercial and residential area. Areas to the north and west of the site are predominantly commercial and densely developed with large retail stores and parking lot on the northern side of East 3300 South. The soundscape is influenced by vehicles travelling on East 3300 South, which runs along the northern boundary of the site, and 1300 East which runs along the eastern boundary. The nearest sensitive receptors are residences bordering the eastern, western, and southern boundaries of the site, approximately 50 feet from the site; and The Church of Jesus Christ of Latter-day Saints, approximately 1,125 feet southwest of the site. The surrounding development to the north is commercial. No other sensitive receptors are located within 0.25 miles of the site.

3.10.3.3 Proposed Action – Alternative 3

The soundscape and vibration conditions at the Alternative 3 site are typical of a mixed commercial and residential area. Large commercial buildings and adjoining parking lots are located on the west side of State Street and an auto service facility is located directly south of the site. The soundscape is influenced by vehicles travelling on South State Street, which runs along the western boundary of the site, and Helm Avenue, which runs along the northern boundary. The nearest sensitive receptors are residences on 200 East and Helm Avenue, approximately 50 feet north and south of the site; The Church of Jesus Christ of Latter-day Saints, approximately 700 feet southwest of the site; Smart Kids Salt Lake, approximately 700

feet south of the site; Lumos Language School, approximately 1,000 feet south of the site; and the Christian Congregation in the United States, approximately 1,300 feet southeast of the site.

3.10.3.4 Proposed Action - Alternative 4

The soundscape and vibration conditions in the area surrounding the Alternative 4 site are typical of a busy commercial district. The site is located on the northeast quadrant of Veterans Memorials Highway (I-15) and Dwight D. Eisenhower Highway (I-80) on the west side of South 300 West. As such, the soundscape is influenced by heavily trafficked roads. The surrounding development is commercial. The nearest sensitive receptors are residences on Oakland Avenue, with the nearest residence located approximately 1,800 feet to the southeast. No other sensitive receptors are located within 0.25 miles of the site.

3.10.4 Environmental Consequences

3.10.4.1 Proposed Action – Alternatives 1, 2, 3, and 4

3.10.4.1.1 Construction Noise

Under Alternatives 1, 2, 3 or 4, the Proposed Action construction activities would generate noise from equipment used during building and infrastructure demolition, site grading, vertical construction, and paving. Typical construction equipment involved 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 7:00 a.m. or later than 9 p.m. in accordance with the Salt Lake City noise control ordinance.

The nearest residential receptors to the Alternative 1 and 4 sites are approximately 1,025 feet away from either site. Construction noises at approximately 90-100 dBA would be reduced to approximately 80-70 dBA. The nearest residential receptors to the Alternative 2 and 3 sites are approximately 50 feet away from either site. Construction noises of approximately 90-100 dBA would only have a minor reduction at 50 feet away, but the noise levels would be further at the residential receptors due to the presence of other sound dampening barriers, including the walls and windows of the residences.

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.

3.10.4.1.1.1 Alternatives 1 and 4

Construction of the Proposed Action at the Alternative 1 or 4 sites would result in a temporary, negligible adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.1.1.2 Alternatives 2 and 3

Construction of the Proposed Action at the Alternative 2 or 3 sites would result in a temporary, minor adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.1.2 Operation Noise

Under Alternative 1, 2, 3, or 4, the operation of the Proposed Action would create noises and noise levels typical of a medical outpatient facility. Noises would be primarily generated from vehicles traveling to and from the OPC on existing roadways. 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 roadways throughout the densely developed Salt Lake City metropolitan area.

Therefore, the operation of the Proposed Action under Alternatives 1, 2, 3, or 4, would have a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.1.3 Construction Vibration

Under Alternatives 1, 2, 3, or 4, existing buildings at a site would require demolition that may involve jackhammering equipment. Following grading, tampers may be needed to compact the soil to make it the site suitable for redevelopment. This work would temporarily increase vibration levels at a site.

Construction would cause various degrees of ground vibration, depending on the equipment, methods employed, and soil compactness, but the vibrations diminish in strength with distance (Hanson 2006). Typical vibration levels from construction equipment at a reference distance of 25 feet are: 104 VdB for an impact pile driver; 87 VdB for a bulldozer; 86 VdB for a loaded truck; and 79 VdB for a jackhammer. In general, if most construction activity is located more than 75 feet from the nearest sensitive receptor, the estimated vibration levels would be expected to be below the strong annoyance criterion of 85 VdB (FTA 2018).

3.10.4.1.3.1 Alternatives 1 and 4

Under Alternative 1 and 4, the nearest residential sensitive receptors are approximately 1,025 feet away.

Therefore, the construction of Proposed Action under Alternatives 1 and 4 would have no impact on vibration-sensitive receptors.

3.10.4.1.3.2 Alternatives 2 and 3

Under Alternatives 2 and 3, the nearest residential sensitive receptors are approximately 50 feet away.

Potential construction-period vibration impacts would be assessed during the final design phase, when construction methods and the locations of specific types of construction equipment have been identified. Measures for reducing vibration impact to sensitive receptors would be considered in the development of construction plans for areas where construction activities causing short-term perceptible vibration could be required.

Therefore, the construction of Proposed Action under Alternatives 2 and 3 would have a temporary, minor adverse impact on vibration-sensitive receptors.

3.10.4.1.4 Operation Vibration

Under Alternatives 1, 2, 3, or 4, the operation of Proposed Action has no mechanisms to generate vibrations that would extend off-site to impact the surrounding community.

3.10.4.2 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 impacts to noise- and vibration-sensitive receptors.

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 site, the associated private entity provided VA with a Phase I Environmental Site Assessment (ESA) completed according to 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. The following sections discuss the Phase I ESA findings for each site.

3.11.1.1 Proposed Action – Alternative 1

The Phase I ESA report for the Alternative 1 site (2191 South 300 West, South Salt Lake, UT) was completed in September 2023. The Phase I ESA did not identify evidence of recognized environmental conditions (RECs) at the Alternative 1 site.

The Phase I ESA stated that the four on-site buildings were constructed between 1950-1976. As a result, the buildings could contain asbestos-containing building materials, lead-based paints, mercury-containing light switches and fluorescent light ballasts with PCBs. Surveys for these buildings' materials have not been performed.

3.11.1.2 Proposed Action – Alternative 2

The Phase I ESA report for the Alternative 2 site (3300 South 1300 East, Millcreek, UT) was completed in September 2023. The Phase I ESA identified the following REC:

1. A dry-cleaner (Norge Laundry and Dry Cleaning Village) operated on the northeast end of the subject property from about 1961 to 1974. As the dry cleaner used and stored chlorinated solvents such as tetrachloroethylene, also known as PCE or PERC, there is a potential for subsurface soil, groundwater, and soil gas contamination on site related to historical releases of the solvents and their subsequent chemical breakdown products. The historical dry cleaner on site is a REC.

The Phase I ESA recommended further investigation to check for contamination on the property, but no additional investigation has been performed to date. The Phase I ESA did not identify any other RECs or Vapor Encroachment Conditions (VEC) from current or past property conditions or occupants, and there was no evidence of nearby off-site facilities or environmental conditions impacting the property or presenting a VEC.

Subsequently, in October 2023, four soil samples (collected 1- to 2.5-feet below ground surface) and four soil vapor samples (collected five feet below ground surface) were collected at the site for laboratory chemical analysis of volatile organic solvents associated with dry cleaning operations. The collected soils samples PCE and trichloroethylene (TCE) at concentrations above the USEPA Protection of Groundwater Soil Screening Levels, but below both the USEPA Residential and Industrial Screening Levels. The soil gas samples showed PCE and TCE concentrations were above the USEPA Vapor Intrusion Screening Levels for both Residential and Commercial Target Sub-slab and Exterior Soil Gas Concentrations. These data suggest

that solvents were released in the former dry cleaner building and have migrated into the subsurface soils. However, the full horizontal and vertical extent of contamination was not delineated in this investigation. The other contaminants detected in soil gas samples at concentrations exceeding USEPA residential and/or commercial targets included 1,3-butadiene and chloroform, likely due to releases of regional auto exhaust and through the standard process of chlorinating public drinking water. The October 2023 report recommended coordination with the UDEQ to help determine if further action is recommended regarding the detected soil gas contaminants. Presumably, further investigation involving soil gas, soil and groundwater sampling would be requested to help further delineate the extent of the contamination and to help find the source(s) of the release of solvents.

A Limited Subsurface Investigation Report prepared on June 12, 2024, described the findings from an additional investigation performed on April 20, 2024, to assess the REC identified in the Phase I ESA and the prior shallow soil sampling investigation. This investigation involved collecting soil samples from three borings and one groundwater sample for analysis of volatile organic compounds. A photoionization detector was used to field screen each soil boring for VOCs to target the 2-foot depth interval having the highest field screening reading from each boring; this depth interval would then be collected for laboratory analysis. The depth intervals with the highest field screening data ranged from 25 to 36 feet below ground. The soil samples collected from these depths were sent to an analytical laboratory for chemical analysis for VOCs. The laboratory data showed PCE was present in soil samples collected from 25- to 36-feet below ground at concentrations ranging from 0.0105 to 0.0285 milligrams per kilogram (mg/kg). Toluene was detected in one soil sample at 25-26-feet below ground at 0.00139 mg/kg. These concentrations in the soil samples were below the USEPA Regional Screening Level (RSL) and the UDEQ ISLs. In the only groundwater sample collected, chloroform and tetrachloroethene were detected at 0.00226 and 0.00191 milligrams per liter (mg/L), respectively. The concentrations were below the USEPA Maximum Contaminant Levels and Tapwater RSLs and the UDEQ ISLs for groundwater. The report stated "The observed concentrations of the chemicals of concern in the soil and groundwater indicate that the soil and groundwater are not negatively impacted and do not pose a risk from the chemicals of concern. The source of the PCE in the groundwater cannot be identified from the scope of this limited investigation."

The investigations completed in October 2023 and April 2024 showed that shallow and deep soil is contaminated with VOCs beneath the footprint of the former drycleaner building at the Alternative 2 site. To date, VA is not aware of any consultation between the private entity and UDEQ, corrective actions, or further investigations at the Alternative 2 site.

The September 2023 Phase I ESA also stated that the on-site buildings were constructed in 1974 and 1975 and may have been constructed with asbestos-containing building materials, lead-based paints, mercury-containing light switches and fluorescent light ballasts with PCBs. No surveys have been conducted to date.

3.11.1.3 Proposed Action - Alternative 3

The Phase I ESA report for the Alternative 3 site (3711 South State Street, South Salt Lake, UT) was completed in October 2023. The Phase I ESA identified the following three RECs:

1. **On-site Historical Underground Storage Tanks (USTs) and a Leaking Underground Storage Tank (LUST):** Six underground storage tanks were historically located in the southwestern portion of the site. Based on the absence of sufficient documentation of removal and closure of the six former USTs, and the identified benzene impacts to groundwater, the six USTs represent a REC to the site. Additionally, a 2,000-gallon gasoline LUST was located on the site from 1989 to 2011.

Based on the soil contaminants identified and the absence of groundwater sampling at the time of closure, the LUST represents a REC.

2. **South Adjoining Historical UST:** The "B and B Construction" facility is south adjacent of the Alternative 3 site. An unregistered 2,000-gallon gasoline UST was historically identified at the facility. According to the UDEQ, the UST installation date is unknown; however, the UST was estimated to have last been used prior to 1982. Following removal of the UST on April 30, 1990, a release was reported to the UDEQ on May 3, 1990. Petroleum hydrocarbons were detected in soil and in groundwater samples at concentrations above UDEQ Initial Screen Levels (ISLs), but below the USEPA maximum contaminant levels. According to the UDEQ, petroleum hydrocarbon concentrations in groundwater samples decreased from 1990 to 1993; however, no remediation activities occurred. In 1993, the UDEQ determined that no further action was required. The Phase I ESA reported that groundwater flow direction is to the north; groundwater flows from the B and B Construction facility toward the Alternative 2 site. As a result, the Phase I ESA identified the B and B Construction facility as a REC because of its distance and gradient from the site, the identified groundwater contamination, and the absence of remediation documentation.
3. **On-site Historical Automotive Repair:** The site was historically operated as an automobile sales and service facility from the 1960s to the mid-2010s. During the Phase I ESA site reconnaissance, evidence of former automobile service areas with approximately fifteen sub-grade hydraulic lifts, an oil-water separator, and shop trench floor drain were observed. Although a release from these features was not documented, the Phase I ESA identified these sub-grade features as a REC because they had been in use for more than 40 years.

Following the October 2023 Phase I ESA, a Phase II ESA was completed in December 2024 to assess the three RECs. Seven investigation borings were drilled to 15-feet below ground surface to collect soil and groundwater samples. Laboratory analysis of the soil and groundwater samples collected in the vicinity of the former USTs and near the oil-water separator showed petroleum hydrocarbon concentrations in soil exceeding the applicable UDEQ Initial Screening Level (ISL) unrestricted land use regulatory screening criteria, and in groundwater exceeding UDEQ's Tier 1 screening levels. Tier 1 screening criteria must be met before UDEQ can determine that no further action is warranted. The Phase II ESA concluded that petroleum hydrocarbons were reported in both soil and groundwater exceeding the UDEQ ISL for unrestricted land use. Groundwater concentrations also exceeded UDEQ's Tier 1 risk-based indoor commercial screening levels. The Phase II ESA stated the most likely sources of the contamination were the former underground storage tanks and the oil-water separator. The Phase II ESA recommended consultation with UDEQ for guidance on additional investigations or corrective action associated with proposed future use of the site. To date, VA is not aware of any consultation between the private entity and UDEQ, corrective actions, or further investigations at the Alternative 3 site.

Additionally, the September 2023 Phase I ESA did not provide information about the potential for on-site buildings to contain asbestos-containing building materials, lead-based paints, mercury-containing light switches and fluorescent light ballasts with PCBs. However, the four on-site buildings were constructed between 1969 and 1982. Due to the dates of construction, the buildings have potential to contain regulated building materials. No regulated building material surveys have been conducted to date.

3.11.1.4 Proposed Action - Alternative 4

The Phase I ESA report for Alternative 4 site (2300 South 300 West, South Salt Lake, UT) was completed in September 2023. The Phase I ESA identified the following REC and VEC:

1. One pad-mounted transformer was observed near the northeast exterior of the on-site building, which was constructed in 1976. A "non-polychlorinated biphenyl (non-PCB)" label was not observed on the transformer. Evidence of staining and leaks were observed on the side of the transformer and the surrounding soil. According to federal guidelines, transformers manufactured after July 1979 are required to contain less than 50 parts per million (ppm) PCBs. Because the on-site building was constructed in 1976, it is possible the associated transformer was installed prior to 1979. The Phase I ESA concluded that the presence of the pad-mounted transformer is considered a REC and a VEC because it had an unknown installation date and the evidence of staining and leaks observed on the side of the transformer and the surrounding soil. To date, no additional investigation has been performed.

On November 5, 2024, a Phase I ESA addendum was issued to document that Rocky Mountain Power confirmed that PCBs are not present in the pad-mounted transformer on-site. The addendum stated that the release observed from the transformer is no longer considered a REC/VEC due to the information from Rocky Mountain Power, and the release is a *de minimis* condition which would not be the subject of enforcement action if brought to the attention of appropriate regulatory authorities.

Additionally, the September 2023 Phase I ESA stated that the on-site building was constructed in 1976 and, due to its age, may have been constructed with asbestos-containing building materials, lead-based paints, mercury-containing light switches and fluorescent light ballasts with PCBs. However, no surveys for regulated building materials have been conducted to date.

3.11.2 Environmental Consequences

3.11.2.1 Construction

3.11.2.1.1 Regulated Building Materials

3.11.2.1.1.1 Alternatives 1, 2, 3, and 4

The Alternative 1, 2, 3, and 4 sites each have buildings that are either known to contain or may potentially contain (due to the age of the building) regulated building materials, such as asbestos and lead. As a result, prior to the demolition of any building, the private entity would be responsible for assessing the buildings for asbestos-containing materials (ACM) in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants and the OSHA Asbestos Construction Standard (29 CFR 1926.1101). Should ACM be present, the private entity would be responsible for proper abatement and disposal in accordance with USEPA 40 CFR 61.150 and UDEQ Asbestos Rule R307-801.

The disturbance of lead-based paint (LBP) is regulated by OSHA and the National Emission Standards for Hazardous Air Pollutants statute for general dust control. The disposal of commercial waste materials containing lead from rehabilitation, abatement, and/or demolition is regulated by the Resource Conservation and Recovery Act (RCRA). Accordingly, the private entity would be responsible for assessing the buildings for LBP and determining the appropriate disposal requirements by testing samples using the Toxicity Characteristic Leaching Procedure. Should LBP be present, the private entity would be responsible for proper worker protection per the OSHA Lead-in-Construction standard and disposal at a USEPA-approved landfill in accordance with RCRA.

3.11.2.1.2 Environmental Soil and/or Groundwater Contamination

3.11.2.1.2.1 Alternative 2

The Phase I ESA identified a REC associated with the former dry cleaner in the eastern portion of the Alternative 2 site. Subsequent investigations completed in October 2023 and April 2024 showed that shallow and deep soil and groundwater samples collected beneath the footprint of the former drycleaner

building were contaminated with VOCs, but at concentrations below the USEPA RSL and Maximum Contaminant Level and the UDEQ ISL.

Prior to the start of the construction phase, the private entity would coordinate with UDEQ to determine if further investigation or remediation is necessary. If required, the private entity would carry out these actions to achieve a "no further action" status from UDEQ for this legacy release. Accordingly, soil mitigation could include excavating and disposing of contaminated soil at a USEPA-approved off-site landfill. Groundwater mitigation could include monitored natural attenuation; using VOC-absorbent socks in recovery wells; bioremediation, or chemical treatment. The OPC foundation could also be constructed with a vapor barrier to prevent VOCs from migrating into the facility. Mitigation could also include an institutional control, such as a deed restriction, to limit human exposure to contaminated soil and groundwater.

3.11.2.1.2.2 Alternative 3

The Phase II ESA completed in December 2024 showed petroleum hydrocarbon contamination in soil and groundwater collected near the former USTs and the oil-water separator. The petroleum hydrocarbon contamination concentrations were above UDEQ's unrestricted land use regulatory screening criteria in soil and Tier 1 screening levels in groundwater.

Prior to the start of the construction phase, the private entity would coordinate with UDEQ to determine if further investigation or remediation is necessary. If required, the private entity would carry out these actions to achieve a "no further action" status from UDEQ for this legacy release. Accordingly, soil mitigation could include excavating and disposing of contaminated soil at a USEPA-approved off-site landfill. Groundwater mitigation could include monitored natural attenuation; using oil-absorbent socks in recovery wells; bioremediation, or chemical treatment. The OPC foundation could also be constructed with a vapor barrier to prevent petroleum hydrocarbons from migrating into the facility. Mitigation could also include an institutional control, such as a deed restriction, to limit human exposure to contaminated soil and groundwater.

3.11.2.1.3 Construction and Demolition Debris

3.11.2.1.3.1 Alternatives 1, 2, 3, and 4

Under Alternatives 1, 2, 3, or 4, for all other debris generated at the site during the construction phase, 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 other construction wastes.

Therefore, the construction of the Proposed Action under Alternatives 1, 2, 3, or 4, would remove potential contamination from the site but temporarily increasing the volume of construction-related debris disposed of at an off-site landfill. As a result, the construction of the Proposed Action would have a temporary, minor adverse impact on solid waste.

3.11.2.1.4 Operation

3.11.2.1.4.1 Alternatives 1, 2, 3, and 4

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 waste 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 Alternative 1, 2, 3, or 4, would have a permanent, negligible adverse impact on solid waste and hazardous materials due to the generation of routine wastes from operating 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.

3.12.1 Affected Environment

A traffic impact analysis evaluates the volume-to-capacity ratio, which measures how closely the actual traffic volume at an intersection approaches its maximum capacity. This analysis enables planners to identify potential bottlenecks and areas where traffic flow may be significantly affected. 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 12). An LOS "A" represents good operating conditions, while LOS "F" represents unsatisfactory operating conditions (Transportation Research Board 2022).

VA aims to limit the Proposed Action CLV increase to no more than 20% above the projected increase under the No Action alternative for the same time period. If the CLV increase exceeds 20%, then it should not be significantly higher than the CLV increase under the No Action alternative over the same period. If the CLV increase with the Proposed Action by year 2044 is significantly greater than the No Action alternative, then VA aims to maintain a consistent or improved LOS for the Proposed Action.

At each of the Alternative 1, 2, 3, and 4 sites, VA's transportation consultant performed a planning-level traffic impact analysis to assess the existing transportation conditions surrounding the site and to estimate potential future traffic impacts on the Level of Service (LOS) on transportation conditions with and without the Proposed Action by the year 2044. A description of the traffic impact analysis methods and findings is provided in the following sections for each alternative site.

3.12.1.1 Proposed Action – Alternative 1

3.12.1.1.1 Existing Transit Conditions

The Alternative 1 site is currently developed with two warehouses and two office/shop buildings. The area surrounding the site is commercial and heavily developed. Vehicle traffic generated at the site is associated with the warehouses and office/shop buildings. Vehicles can access the site from the western

site entrance along 300 West or the northern entrance along West Utopia Avenue. Pedestrian sidewalks are present only along 300 West. There are no designated bicycle lanes on 300 West.

The site is bordered by the TRAX Green Line tracks to the south and the Green/Blue/Red Lines to the east. The nearest TRAX light rail station is the Central Pointe Station, which is located approximately 200 feet northeast of the site. Public bus stops are located along 300 West and 2100 S/West Temple, approximately 750 feet north of the site.

Table 12. 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 is 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

3.12.1.1.2 OPC Concept Plan Layout

The Alternative 1 conceptual plan shows the OPC building would be aligned in the western portion of the site and the parking garage in the eastern portion of the site (Figure 6). The parking garage and ground-level parking would provide parking for approximately 600 vehicles. A pedestrian path with landscaped grounds would be located between the OPC and the parking garage.

The OPC main entrance drive would be located on Utopia Avenue and would provide visitors with a drop-off area between the OPC and the parking garage. A secondary entrance for visitors, staff, and deliveries would be on West Utopia Drive, approximately 150 feet east of the main entrance. A dedicated ambulatory drive (drop-off point) would be located along 300 West. A one-way exit drive on the southern portion of the site would allow vehicles to exit the site onto the northbound travel lane of 300 West.

3.12.1.1.3 Traffic Impact Analysis

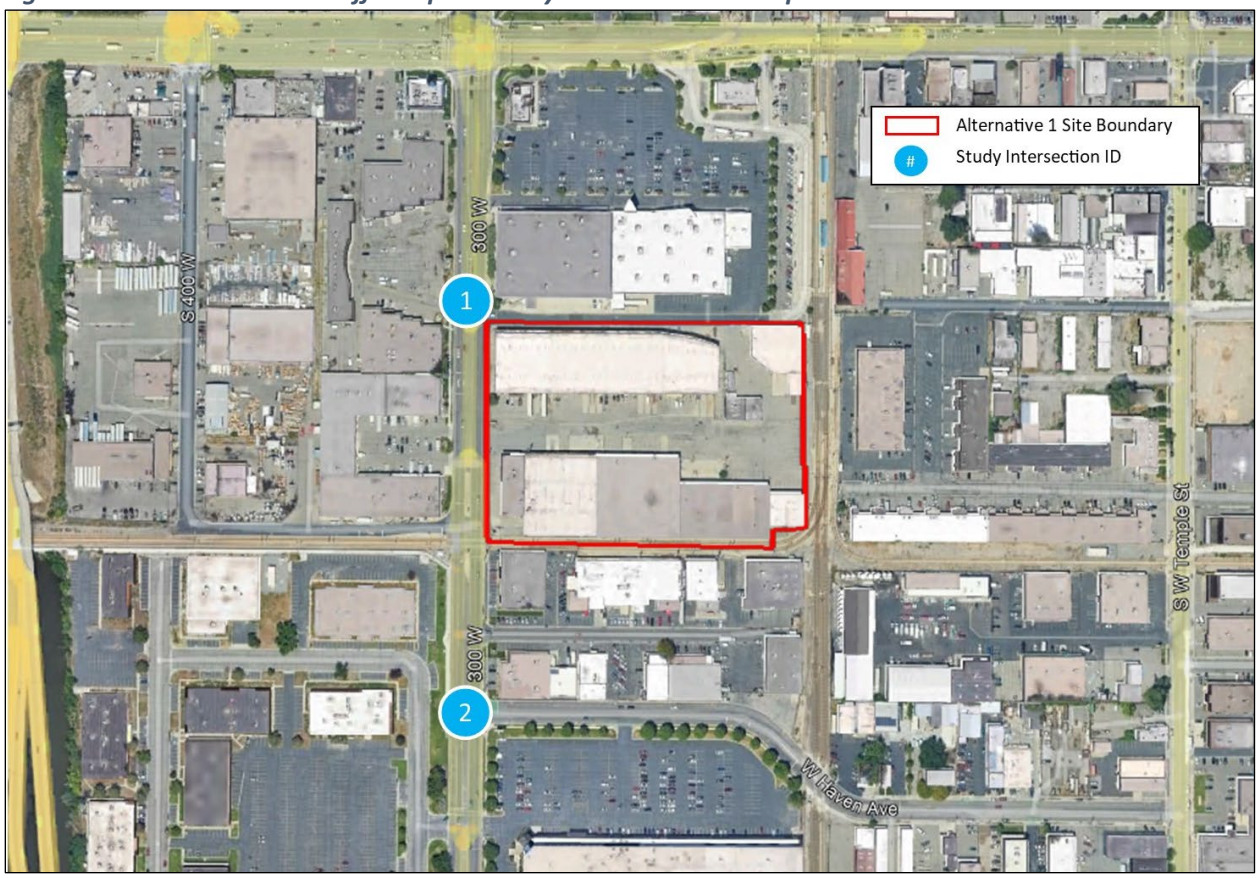
On December 3, 2024, intersection turning movement counts and capacity analyses were conducted at two intersections selected based on their proximity to the site and the proposed future OPC site entrances (Figure 26). Peak hour traffic volumes were collected from 6-9 a.m. and 3-7 p.m.

As shown in Table 13, both intersections operate at LOS “A”, meaning traffic flows freely, with little or no restrictions to vehicle maneuvers within the traffic stream.

Table 13. Alternative 1 – Year 2024 LOS at the Traffic Impact Analysis Intersection

Intersection	Crossroads	2024 LOS (a.m.)	2024 LOS (p.m.)
1	South 300 West & West Haven Avenue	A	A
2	South 300 West & West Utopia Avenue	A	A

Figure 26. Alternative 1 – Traffic Impact Analysis Intersection Map



3.12.1.2 Proposed Action – Alternative 2

3.12.1.2.1 Existing Transit Conditions

The Alternative 2 site is currently developed with a retail shopping plaza. The area surrounding the site is densely developed with mixed commercial and residential uses. Vehicle traffic generated at the site is associated with retail plaza. Vehicles can access the site from the northern site entrance along 3300 South or the eastern entrance along 1300 East. An access road along 3300 South leads to the southwestern portion of the site and the rear of the retail buildings. Pedestrian sidewalks are present along 3300 South West and 1300 East. There are no designated bicycle lanes on either road. Public transit bus stops are located directly in front of the site on 3300 South and 1300 East.

3.12.1.2.2 OPC Concept Plan Layout

The OPC building would be aligned in the southeastern portion of the site, with the parking garage on the western portion of the site (Figure 7). A pedestrian path with landscaped grounds would be located between the OPC and the garage; a path from the garage would also provide staff access to a dedicated staff entrance on the southwestern side of the OPC building.

The OPC would have two main entrance drives, one on South 1300 East and one on 1300 West; both access drives would lead to a single main drop-off rotary in front of the OPC visitor entrance and also allow vehicles to continue to the parking garage. A dedicated ambulatory drive (drop-off point) would be located along 1300 West. An existing access drive that extends southeast from 300 South to the site would provide access to the southern entrance of the parking garage.

3.12.1.2.3 Traffic Impact Analysis

On December 3, 2024, intersection turning movement counts and capacity analyses were conducted at two intersections selected based on their proximity to the site and the proposed future OPC access points (Figure 27). Peak hour traffic volumes were collected from 6-9 a.m. and 3-7 p.m.

As shown in Table 14**Error! Reference source not found.**, Intersection 1 operates at LOS "A" conditions during the a.m. peak hours and LOS "B" during the p.m. at the p.m. peak hour. Intersection 2 operates at LOS "A" during both a.m. and p.m. peak hours.

Table 14. Alternative 2 – Year 2024 LOS at the Traffic Impact Analysis Intersection

Intersection	Crossroads	2024 LOS (a.m.)	2024 LOS (p.m.)
1	South 1300 East & East 3300 South	A	B
2	South 1300 East & East 3345 South	A	A

Figure 27. Alternative 2 - Traffic Impact Analysis Intersection Map

3.12.1.3 Proposed Action – Alternative 3

3.12.1.3.1 Existing Transit Conditions

The Alternative 3 site is currently developed with a car rental service and a recreational vehicle dealership. The area surrounding the site is densely developed with mixed commercial and residential uses. Vehicle traffic generated at the site is associated with retail plaza. Vehicles can access the site from the western site entrance along South State Street or the eastern entrance along South 200 East. The site is also accessible from a curb cut at the northern end of the cul-de-sac on South Secord Street. Pedestrian sidewalks are present along State Street, South 200 East, and South Secord Street. There are no designated bicycle lanes on these roads. Public transit bus stops are located within 200 feet of the site

along South State Street.

3.12.1.3.2 OPC Concept Plan Layout

The OPC building would be aligned in the central portion of the site, with the parking garage on the eastern portion of the site (Figure 8). Separate ground-level parking lots would be located in the northern and southern portions of the site, with the southern lot reserved for staff. A pedestrian walkway that crosses the staff entrance road would provide access to and from the OPC and the parking garage. The Alternative 3 conceptual development plan does not show any pedestrian pathways with landscaped grounds.

The OPC would have three main vehicle entrance drives, with one on East Helm Avenue, one on 200 East, and one on State Street. The East Helm Avenue and 200 East access drives would provide access to the north ground-level parking lot, while the State Street access drive would also provide access to this lot and the main drop-off point to the OPC building. The State Street access drive continues around the eastern side of the OPC building to provide access to the southern ground-level parking lot for staff. The southern parking lot would also access the northern terminus of South Secord Street. The parking garage would have a single entrance/exit point on 200 East.

3.12.1.3.3 Traffic Impact Analysis

On December 3, 2024, intersection turning movement counts and capacity analyses were conducted at three intersections selected based on their proximity to the site and the proposed future OPC access points (Figure 28). Peak hour traffic volumes were collected from 6-9 a.m. and 3-7 p.m.

As shown in Table 15, all intersections currently operate at LOS "A" during the a.m. and p.m. peak hours.

Table 15. Alternative 3 – Year 2024 LOS at the Traffic Impact Analysis Intersection

Intersection	Crossroads	2024 LOS (a.m.)	2024 LOS (p.m.)
1	US 89 & East Helm Avenue	A	A
2	East Helm Avenue & South 200 East Street	A	A
3	US 89 & Rigdon Avenue	A	A

Figure 28. Alternative 3 – Traffic Impact Analysis Intersection Map

3.12.1.4 Proposed Action – Alternative 4

3.12.1.4.1 Existing Transit Conditions

The Alternative 4 site is currently developed with an office building and parking lot. The area surrounding the site is densely developed with commercial uses. Vehicle traffic generated at the site is associated with office buildings that share the parking lot. Vehicles can access the site from the northern site entrance along Bugatti Avenue, the western entrance along Bearcat Drive, the eastern entrance along Mercer Way, or from the south via the shared parking lot. There are no sidewalks or designated bicycle lanes on these roads. The nearest public transit bus stops are located on 300 West and 2100 South/West Temple, approximately 1,500 feet north of the site. The nearest TRAX light rail station is the Central Pointe Station, which is located approximately 1,200 feet northeast of the site.

3.12.1.4.2 OPC Concept Plan Layout

The OPC building would be aligned in the northeast portion of the site, with the parking garage on the western portion of the site (Figure 9). A ground-level parking lot with spaces reserved for handicapped parking would be located in the southeastern portion of the site. A covered pedestrian walkway would provide access to and from the OPC and the parking garage. The Alternative 4 conceptual development plan shows several outdoor landscaped plazas throughout the site.

The OPC would have one main vehicle entrance drive on Mercer Way, which is accessible from 300 West. This entrance would provide access to the drop-off point at the OPC building main entrance, the handicap parking area, and to the parking garage. An ambulatory/service entrance drive would be present along Bugatti Avenue South. A separate staff vehicle entrance would be along Bearcat Drive; this staff entrance would also provide access to the northern entrance of the parking garage.

3.12.1.4.3 Traffic Impact Analysis

On December 3, 2024, intersection turning movement counts and capacity analyses were conducted at two intersections selected based on their proximity to the site and the proposed future access points (Figure 29). Peak hour traffic volumes were collected from 6-9 a.m. and 3-7 p.m.

As shown in Table 16, both intersections operate at LOS “A” during the a.m. and p.m. peak hours.

Table 16. Alternative 4 – Year 2024 LOS at the Traffic Impact Analysis Intersection

Intersection	Crossroads	2024 LOS (a.m.)	2024 LOS (p.m.)
1	South 300 West & Times Square Business Park / RC Willey	A	A
2	Mercer Way & Times Square Business Park entrance	A	A

Figure 29. Alternative 4 – Traffic Impact Analysis Intersection Map

3.12.2 Environmental Consequences

3.12.2.1 Proposed Action – Alternatives 1, 2, 3, and 4

3.12.2.1.1 Construction

Under Alternatives 1, 2, 3, or 4, construction activities would generate vehicle traffic involved with transporting construction and demolition debris off site; the delivery of construction materials and equipment to the site; workers commuting to and from the site; and the removal of equipment once construction is completed. To minimize impact on traffic flow on area roadways, deliveries of construction materials and equipment to and from the site would be periodic and generally scheduled to occur outside of peak commuting periods. Construction worker travel would occur daily and may overlap with peak commuting times. Although worker trips would take place during these peak periods, some of these trips might involve carpooling and/or public transit, reducing the potential impact on traffic volumes.

Prior to constructing entrances to the along public roads, the private entity would be required to apply for and obtain the following permits:

As part of the proposed redevelopment project, several new vehicular entrances, access points, or modifications to the curb, gutter, or sidewalk within the public right-of-way along state- or city-managed roadways would require prior review and authorization by the Utah Department of Transportation (UDOT), the City of South Salt Lake (for Alternatives 1, 3, and 4) or the City of Millcreek (for Alternative 2).

Before any construction activity affecting a state-managed roadway begins, the private entity would complete formal pre-consultation process with UDOT Region 2; submit an application for a UDOT

Conditional Access Permit, which is required for new driveway connections to a state highway; obtain an UDOT Encroachment Permit, which is required for construction activities within the state right-of-way.

For Alternatives 1, 3, and 4, the City of South Salt Lake requires Engineering Permits, including a separate Public Way Permit for any work within its own public right-of-way. This local permit applies to modifications of curbs, sidewalks, and driveway approaches, even when the work overlaps with UDOT jurisdiction. As part of this process, the developer would also be required to obtain a Traffic Control permit and submit a traffic control plan for review by the South Salt Lake Transportation and Engineering Divisions. The plan must demonstrate how pedestrian and vehicle safety will be maintained during construction, and how disruptions to existing traffic patterns will be minimized.

For Alternative 2, the City of Millcreek requires a separate Right-of-Way Permit ("Excavation and Encroachment Permit") for any work within the municipal right-of-way. This permit, issued by the Millcreek Public Works Department, covers improvements such as curb cuts, sidewalk alterations, and park strip work. As part of the city's review process, the private entity would submit engineered construction drawings and a traffic control plan that conforms to the Manual on Uniform Traffic Control Devices.

Therefore, the private entity would obtain all necessary permits prior to initiating ground disturbance, and construction activities will be coordinated with these agencies to ensure adherence to safety standards, traffic management practices, and right-of-way protection requirements. As a result, the construction of the Proposed Action under Alternative 1, 2, 3, or 4 would have a temporary, negligible impact on traffic conditions at the site or on the surrounding roadways.

3.12.2.2 Proposed Action – Alternative 1

3.12.2.2.1 Operation

The planning-level traffic impact analysis used a model to project how the Proposed Action under Alternative 1 could impact traffic conditions at the study intersections by the year 2044 (TTG, Inc. 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. 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, in comparison with the No Action alternative at the same intersections.

As shown in Table 17, both of the Alternative 1 study intersections are projected to continue to operate at LOS "A" with or without the OPC. This means that the additional traffic from the new OPC would not cause significant congestion or delays, and the overall traffic conditions would not worsen compared to the No Action Alternative.

Therefore, the operation of the Proposed Action under Alternative 1 site would have no impact on traffic conditions.

Table 17. Alternative 1 – 2044 Traffic Impact Analysis Summary for the Study Intersections

ID	Intersection	No Action Alternative (by year 2044)				Proposed Action Alternative 1 (by year 2044)					
		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	South 300 West & West Haven Avenue	A	382	A	557	A	433	13%	A	588	6%
2	South 300 West & West Utopia Avenue	A	342	A	509	A	542	58%	A	756	49%

3.12.2.3 Proposed Action – Alternative 2

3.12.2.3.1 Operation

The planning-level traffic impact analysis used a model to project how the Proposed Action under Alternative 2 could impact traffic conditions at the study intersections by the year 2044 (TTG, Inc. 2025b). This analysis assumed a 0.5% 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, in comparison with the No Action alternative at the same intersections.

As shown in Table 18, the intersections and roadways at the study intersections in the vicinity of the site would operate at the same LOS "A" and "C" with or without the OPC. This means that the additional traffic from the new OPC would not cause significant congestion or delays, and the overall traffic conditions would not worsen compared to the No Action Alternative.

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

Table 18. Alternative 2 – 2044 Traffic Impact Analysis Summary for the Study Intersections

ID	Crossroads	No Action Alternative (by year 2044)				Proposed Action Alternative 2 (by year 2044)					
		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	South 1300 East & East 3300 South	A	794	C	1,176	A	834	5%	C	1,247	6%
2	South 1300 East & East 3345 South	A	455	A	780	A	500	10%	A	806	3%

3.12.2.4 Proposed Action – Alternative 3

3.12.2.4.1 Operation

The planning-level traffic impact analysis used a model to project how the Proposed Action under Alternative 3 could impact traffic conditions at the study intersections by the year 2044 (TTG, Inc. 2025c). 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. 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, in comparison with the No Action alternative at the same intersections.

As shown in Table 19, the intersections and roadways at the study intersections in the vicinity of the site would operate at LOS "A" with or without the OPC. This means that the additional traffic from the new OPC would not cause significant congestion or delays, and the overall traffic conditions would not worsen compared to the No Action Alternative.

Therefore, the operation of the Proposed Action under Alternative 3 would have no impact on traffic conditions.

As shown in Table 19, the contribution of the OPC to the CLV changes at intersection 1 at the a.m. peak hour, and at intersection 2 at both the a.m. and p.m. peak hours, are projected to be higher than VA's goal of 20% or less. However, the LOS for all three intersections remains at "A."

Therefore, the operation of the Proposed Action at the Alternative 3 site would have a permanent, negligible adverse impact on traffic, transportation, and parking.

Table 19. Alternative 3 – 2044 Traffic Impact Analysis Summary for the Study Intersections

ID	Crossroads	No Action Alternative (by year 2044)				Proposed Action Alternative 3 (by year 2044)					
		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	US 89 & East Helm Avenue	A	579	A	817	A	716	24%	A	945	16%
2	East Helm Avenue & South 200 East Street	A	55	A	107	A	151	175%	A	260	143%
3	US 89 & Rigdon Avenue	A	556	A	850	A	591	6%	A	850	0%

3.12.2.5 Proposed Action – Alternative 4

3.12.2.5.1 Operation

The planning-level traffic impact analysis used a model to project how the Proposed Action under Alternative 4 could impact traffic conditions at the study intersections by the year 2044 (TTG, Inc. 2025d). 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. 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, in comparison with the No Action alternative at the same intersections.

As shown in Table 20, the intersections and roadways at the study intersections in the vicinity of the site would operate at LOS "A" with or without the OPC during the peak a.m. hours. The traffic impact analysis

model predicts that the traffic from the Proposed Action at intersection 1 would result in an LOS "B" during the peak p.m. hours. LOS "B" is an acceptable traffic condition. These data show that additional traffic from the new OPC would not cause significant congestion or delays, and the overall traffic conditions would not significantly worsen compared to the No Action Alternative.

Therefore, the operation of the Proposed Action under Alternative 4 would have a permanent, negligible adverse impact on traffic conditions.

Table 20. Alternative 4 – 2044 Traffic Impact Analysis Summary for the Study Intersections

ID	Crossroads	No Action Alternative (by year 2044)				Proposed Action Alternative 4 (by year 2044)					
		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	South 300 West & Times Square Business Park / RC Willey	A	518	A	932	A	742	43%	B	1,147	23%
2	Mercer Way & Times Square Business Park entrance	A	323	A	316	A	576	78%	A	504	59%

3.12.2.6 No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented. Current roadway conditions at each of the Alternative Action sites would remain unchanged. Although future traffic volumes and conditions were projected for the No Action alternative, these could be influenced by other possible developments in South Salt Lake or Millcreek.

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 1, 3, and 4

The Alternative 1, 2, and 4 sites are located in densely developed areas with well-established utility infrastructure in City of South Salt Lake. Water services would be provided by the South Salt Lake Water Department. Sewer and stormwater services would be provided by the City of South Salt Lake. Electric services would be provided by Rocky Mountain Power and natural gas services would be provided by Enbridge Gas Utah. Telecommunications services can be obtained from multiple providers, including UTOPIA Fiber, Xfinity (Comcast), Verizon, T-Mobile, Google Fiber and CenturyLink (Salt Lake Chamber 2025).

3.13.1.2 Proposed Action – Alternative 2

The Alternative 2 site is located in a densely developed area with well-established utility infrastructure in the City of Millcreek. Water services would be provided by the Salt Lake City Department of Public Utilities. Sewer services would be provided by Mount Olympus Improvement District. Stormwater services would be provided by Millcreek Department of Public Works. Electric services would be provided by Rocky Mountain Power and natural gas services would be provided by Enbridge Gas Utah. Telecommunications services can be obtained from multiple providers, including UTOPIA Fiber, Xfinity (Comcast), Verizon, T-Mobile, Google Fiber, and CenturyLink (Salt Lake Chamber 2025).

3.13.2 Environmental Consequences

3.13.2.1 Proposed Action – Alternatives 1, 2, 3, and 4

Any one of Alternatives 1, 2, 3, or 4 would require connections to all standard utility services, including potable water, sewerage, electricity, telecommunications, and stormwater management. Existing on-site utility infrastructure, such as laterals and conduits, extending from the municipal mains would be removed and replaced with new on-site infrastructure. Stormwater generated at the site would be collected in on-site catch basins and discharged to the municipal stormwater system.

Under Alternatives 1, 2, 3, or 4, as part of the final design, the private entity would be required to confirm and verify with utility providers that sufficient capacities are available to meet the projected demands for the OPC. Additionally, the private entity would apply for and obtain the necessary permits required to connect to and utilize utility services. The private entity would also apply for and obtain any permits needed to use or cross rights-of-way to install utilities.

The construction of utility infrastructure would include preliminary site work to create utility corridors and coordination with utility providers to ensure uninterrupted utility services for existing customers in the community.

Therefore, the construction of the Proposed Action under Alternatives 1, 2, 3, or 4 would have a temporary, negligible adverse impact on utilities.

3.13.2.1.1 Operation

Under Alternatives 1, 2, 3, or 4, the private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewerage utilities, thereby lessening the demand for utilities. The private entity would be required to maintain any privately-owned on-site utility infrastructure to ensure that the quality of utility services continuously meets VA's operational requirements for the duration of VA's lease.

Therefore, the operation of the Proposed Action would have a permanent, negligible adverse impact through the increased consumption of utilities.

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 have no impact on any utility supplies or delivery infrastructure.

3.14 Community Services

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

3.14.1 Affected Environment

3.14.1.1 Proposed Action - Alternatives 1, 2, 3, and 4

The U.S. Census Bureau estimates Salt Lake County's population at approximately 1,185,813 (2023 ACS 1-year estimate), with approximately 32,058 veterans, or 3.6% of the total county population, which is lower than Utah's statewide Veteran rate of 4.5% (Census Reporter 2024).

The VA Salt Lake City Health Care System offers a wide range of services for Veterans in eleven locations in Utah, Idaho, and Nevada including the main VA hospital and ten outpatient clinics. These clinics are currently over capacity, resulting in prolonged waiting times for Veterans in need of care at a VA medical facility. Other major public hospitals near South Salt Lake and Millcreek include St. Marks Hospital, Intermountain Medical Center, Holy Cross Hospital, LDS Hospital, University of Utah Hospital, and the Salt Lake City VAMC.

Public safety services in South Salt Lake and Millcreek are provided by the South Salt Lake Police Department and the Unified Police Department of Greater Salt Lake, Millcreek Precinct. Fire and emergency/rescue services are provided by the South Salt Lake Fire Department and the Unified Fire Authority of Greater Salt Lake.

3.14.2 Environmental Consequences

3.14.2.1 Proposed Action - Alternatives 1, 2, 3, and 4

3.14.2.1.1 Construction and Operation

Under Alternative 1, 2, 3, or 4, the construction and operation of 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 prior VA OPC projects, the construction and operation of any one of the Proposed Action Alternatives 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 any one of the Proposed Action Alternatives would not result in an increase in the population of families with children such that it would cause expanded enrollment at local schools.

The OPC would resolve service gaps and capacity issues of the VA Salt Lake City Health Care System and provide a full range of outpatient medical services for Veterans in Salt Lake City. The OPC would serve Veterans with both primary care and mental health needs as well as offer pharmacy, laboratory, pathology, and social work services.

Therefore, by increasing area Veterans' access to quality health care, operation of the Proposed Action would result in a permanent, significant beneficial impact on community services related to health care for Veterans in Salt Lake City. There would be no impact on other local community services.

3.14.2.2 No Action Alternative

Under the No Action alternative, the VA Salt Lake City Health Care System outpatient clinics would continue to be overburdened, and local Veterans would still experience service gaps. The No Action alternative does not meet the purpose and need for action and would diminish the level of care that VA is able to provide Veterans in Salt Lake City.

Therefore, the No Action alternative would have a permanent, significant adverse impact on community services for Veterans in Salt Lake City.

3.15 Socioeconomics

Socioeconomics refers to the social and economic conditions in the communities surrounding the Proposed Action. In this chapter analyzing socioeconomic conditions, data were drawn specifically from Salt Lake County, even when discussing aspects of the regional economy. Salt Lake County serves as the economic and population core of the broader Salt Lake City Metropolitan Statistical Area (MSA) and contains the majority of the region's jobs, infrastructure, and residents.

Using county-level data allows for greater consistency and precision, as it is more frequently updated, widely available from the U.S. Census Bureau, and aligned with most local planning and service jurisdictions. While the MSA includes additional areas such as Tooele County, Salt Lake County alone provides a reliable and representative picture of regional socioeconomic trends for the purposes of this analysis.

3.15.1 Affected Environment

3.15.1.1 Proposed Action – Alternatives 1, 2, 3, and 4

Salt Lake County, UT is located in north-central Utah and encompasses sixteen cities, including South Salt Lake and Millcreek, and six townships. Salt Lake County is home to approximately one-third of Utah's population, providing approximately 47% of Utah's jobs, and more than half of the wages and the gross domestic product (GDP) for the state (The University of Utah 2025). Major industries in the region include healthcare and social assistance, retail trade, and manufacturing, and the highest paying industries are mining, quarrying, oil and gas extraction, utilities, and professional, scientific, & technical services (DATA USA 2025). Utah's military and defense industry is also a major contributor to the state's economy, contributing an estimated $22.2 billion to Utah's GDP and generating $14.6 billion in personal income (Utah Department of Veterans & Military Affairs 2025). In 2023, the GDP of Utah was approximately $300B and the GDP of Salt Lake County was $115B (FRED 2023).

The demographic data for Salt Lake County is provided in Table 21 (Census Reporter 2023). Other key socioeconomic indicators representing the affected environment include the unemployment rate, low-income rate, and education attainment, which are provided in Table 22.

Table 21. Demographic Data for Salt Lake County and the State of Utah

Area	Population	Population under 18 Years of Age	Population over 65 Years of Age	Minority (reporting other than white alone)	High School Graduate or higher	Veterans
Salt Lake County	1,185,813	292,798 (25%)	145,398 (12%)	34%	706,929 (91.3%)	32,058 (3.6%)
Utah	3,417,734	933,905 (27.3%)	415,749 (12.2%)	24.3%	1,940,800 (93.1%)	109,653 (4.4%)

3.15.1.2 Income, Poverty, and Employment

Salt Lake County has a similar median household income, a slightly higher percentage of population below the poverty line, and a slightly lower unemployment rate than the state of Utah (Census Reporter 2023).

Table 22. Regional and State Employment and Income

Area	Number of households	Median Household Income	Population Below Poverty Level	Unemployment Rate
Salt Lake County	436,181	$94,439	9.4%	3.1%
Utah	1,167,591	$93,421	9.1%	3.2%

3.15.2 Environmental Consequences

3.15.2.1 Proposed Action – Alternatives 1, 2, 3, and 4

3.15.2.1.1 Construction

Under Alternatives 1, 2, 3, or 4, the construction of the Proposed Action would involve the temporary employment of skilled and non-skilled laborers and require materials that may be purchased from local and regional vendors. There would also be an increase in incidental spending by workers on food, lodging, products, and services, but the amount of spending would represent a negligible increase in the overall economic activity in Salt Lake County.

Therefore, construction of the Proposed Action at any one of the Alternative 1, 2, 3, or 4 sites would have a temporary, negligible beneficial impact on socioeconomic conditions in Salt Lake County.

3.15.2.1.2 Operation

The VA Salt Lake City Health Care System would administer and staff the OPC, with approximately 128 new staff anticipated. The presence of the OPC staff could result in an increase in incidental spending on personal services provided within the local community, but the amount of spending would represent a negligible increase in the overall economic activity in South Salt Lake, Millcreek, but not impact in Salt Lake County.

Therefore, the operation of the Proposed Action under Alternative 1, 2, 3, or 4 would result in a permanent, negligible beneficial impact on socioeconomic conditions in South Salt Lake or Millcreek, but no impact at a regional or state level.

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 any site and socioeconomic conditions would remain unchanged.

Therefore, the No Action alternative would result in no impact on socioeconomic conditions in South Salt Lake, Millcreek, or Salt Lake County.

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 Salt Lake 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 Salt Lake City. 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 chapter summarizes the measures identified throughout Chapter 3 that are incorporated into the Proposed Action, under all Alternatives 1, 2, 3, and 4, to avoid or minimize potential adverse effects. The measures, described in Section 3 and summarized in Table 23, would be implemented by the private entity and maintain potential impacts at less than significant adverse levels for all resources, but do not imply that impacts would be significant without these measures. For resources not listed, no measures were identified.

Table 23. Measures Incorporated into the Proposed Action to Minimize or Avoid Potential Adverse Impacts

Resource	Minimization and Avoidance Measures
Aesthetics	The OPC facility and grounds would be professionally managed to maintain its appearance for the duration of VA's lease.
Air Quality	Design and operate the OPC to achieve Green Globes certification. To the extent practicable, for construction equipment greater than 150 horsepower, the private entity would aim to meet USEPA Tier 4 emissions standards, or Tier 3 standards if Tier 4 equipment is not available at the time of construction; tune and maintain all construction equipment in accordance with the equipment manufacturer's recommended maintenance schedule and specifications; use low-sulfur diesel or biodiesel in construction equipment; minimize off-site tracking of loose soil and the generation of dust by implementing construction best management practices.
Wildlife and Habitat	**For Alternative 3 only:** The private entity would monitor the development of South Salt Lake's forestry regulations, which are still under development, and coordinate with city staff to ensure compliance with any applicable requirements prior to tree clearing at the Alternative 3 site.
Floodplains, Wetlands, and Coastal Zone	**Floodplains**. The Alternative 1 and Alternative 4 sites are located within the 500-year floodplain. The private entity would design the OPC to meet Green Globes certification. The Green Globes program encourages implementing flood-resilient design features, such as elevating mechanical systems or using flood-resistant materials, and using low-impact design techniques, such as bioswales and permeable paving, to help infiltrate stormwater generated at the site.

Resource	Minimization and Avoidance Measures
Geology and Soils	The private entity would design and construct the OPC development according to applicable seismic design requirements per VA, International Building Code, and Greater Salt Lake Municipal Services District criteria. Prior to construction, private entity would apply for coverage under the UT DEQ Utah Pollutant Discharge Elimination System (UPDES) General Construction Stormwater Permit. Soil erosion and sedimentation minimized by implementing UPDES permit-required BMPs specified in *Best Management Practices for Construction Sites.* To minimize the potential impact of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality, the private entity would implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site and train workers on the proper use of the equipment. Releases of regulated quantities of petroleum-based fluids would be reported to VA and UT DEQ and cleaned up per UT DEQ regulatory requirements.
Hydrology and Water Quality	As described for soils, the private entity would implement and maintain UPDES permit-required BMPs. The private entity would also implement a Spill Prevention, Control, and Countermeasure (SPCC) plan and train workers on how to respond to and remediate accidental releases of petroleum-based fluids to prevent impacts to groundwater. The private entity would design and construct a stormwater management system to minimize sedimentation and runoff discharge, incorporating advanced controls like oil-water separators, infiltration systems, and permeable pavement.
Land Use	Private entity to comply with South Salt Lake (Alternative 1, 3, and 4) and City of Millcreek (Alternative 2) zoning regulations.
Noise	If necessary during construction, the private entity would use shields or other physical barriers to restrict noise transmission; provide soundproof housings or enclosures for noise producing machinery; use efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified; conduct truck loading, unloading, and hauling operations so that noise is kept to a minimum; select material transportation routes as far away from sensitive receptors as possible; shut down noise-generating heavy equipment when not in use. The private entity would avoid creating loud noises from 9 p.m. to 7 a.m. on weekdays and Saturday, and 9 p.m. to 9 a.m. on Sundays, to comply with the Salt Lake City noise ordinance, which also applies in South Salt Lake and Millcreek. Private entity to implement a hearing conservation program when construction worker noise exposure is at or above 85 decibels averaged over 8 working hours, or above 90 dBA over an 8-hour time-weighted average, including providing hearing protection.

Resource	Minimization and Avoidance Measures
Vibration	The private entity would assess potential construction-period vibration impacts as part of the final design phase, when construction methods and the locations of specific types of construction equipment have been refined. Measures for reducing vibration impacts to sensitive receptors would be considered in the development of construction plans for areas where construction activities causing short-term perceptible vibration could be required.
Solid Waste and Hazardous Materials	**Alternatives 1, 2, 3, and 4**: Prior to the demolition of any building, the private entity would assess the buildings for asbestos-containing materials (ACM) in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants and the OSHA Asbestos Construction Standard (29 CFR 1926.1101). Should ACM be present, the private entity would be responsible for proper abatement and disposal in accordance with USEPA 40 CFR 61.150 and UDEQ Asbestos Rule R307-801. The private entity would also assess the buildings for lead-based paint (LBP) and determine the appropriate disposal requirements by testing samples using the Toxicity Characteristic Leaching Procedure. Should LBP be present, the private entity would be responsible for proper worker protection per the OSHA Lead-in-Construction standard and disposal at a USEPA-approved landfill in accordance with RCRA. **Alternative 2**: the private entity would coordinate with UDEQ to determine if further investigation or remediation is necessary to achieve a "no further action" status for the release of volatile organic compounds to soil and groundwater from the former drycleaning building at the site. Soil mitigation could include excavating and disposing of contaminated soil at a USEPA-approved off-site landfill. Groundwater mitigation could include monitored natural attenuation; using VOC-absorbent socks in recovery wells; bioremediation, or chemical treatment. The OPC foundation could also be constructed with a vapor barrier to prevent VOCs from migrating into the facility. Mitigation could also include an institutional control, such as a deed restriction, to limit human exposure to contaminated soil and groundwater. **Alternative 3**: the private entity would coordinate with UDEQ to determine if further investigation or remediation is necessary to achieve a "no further action" status for the release of petroleum hydrocarbons to soil and groundwater from the former UST and shop area near the oil-water separator. Mitigation to reduce petroleum hydrocarbon concentrations in soil could include excavating and disposing of contaminated soil off-site at a USEPA-approved landfill. Groundwater mitigation could include monitored natural attenuation; using oil-absorbent socks in recovery wells; bioremediation, or chemical treatment. The OPC foundation could also be constructed with a vapor barrier to prevent petroleum hydrocarbons from migrating into the facility. Mitigation could also include an institutional control, such as a deed restriction, to limit human exposure to contaminated soil and groundwater.

Resource	Minimization and Avoidance Measures
Traffic, Transportation, and Parking	**For Alternatives 1, 2, 3, and 4:** The private entity would coordinate with UDOT for any impacts to state-managed roads and obtain UDOT Conditional Access Permit for new driveway connections to state-managed roads; UDOT Encroachment Permit for construction within the UDOT right-of-way. **For Alternatives 1, 3, and 4**: the private entity would obtain a South Salt Lake Public Way (Right-of-Way) Permit for work in the city-managed right-of-way and a South Salt Lake Traffic Control Permit for any lane closures or signage during construction. **For Alternative 2**: the private entity would obtain a Millcreek Right-of-Way Permit ("Excavation and Encroachment") for work in the city-managed right-of-way; Millcreek Public Works Permit for work on a right-of-way element; and submit a Traffic Control Plan including engineered construction drawings that conforms to the Manual on Uniform Traffic Control Devices.
Utilities	Private entity to apply for and obtain UDOT Encroachment Permit, and South Salt Lake Public Way Permit or Millcreek Right-of-Way Permit for work or activity on or crossing any right-of-way to extend utilities. Private entity to design and operate the OPC to achieve Green Globes certification to ensure efficient use of electricity, water, sewerage, and stormwater utilities during operation.

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 Salt Lake Tribune* 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: https://www.cfm.va.gov/environmental/. VA also electronically sent the scoping notice to selected federal, state, and local agencies; Native American Tribes; and elected officials to solicit input regarding the scope of the EA and environmental issues for in-depth analysis. The scoping notice also described the Proposed Action and solicited input pursuant to Section 106 of the NHPA. Appendix D contains a copy of the newspaper notice.

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 Salt Lake Tribune.* 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 Salt Lake City Public Library, located at 210 East 400 South, Salt Lake City, UT 84111. VA also electronically sent the NOA to federal, state, and local agencies, Tribes, and community stakeholders, to solicit comments on the Draft EA. 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. Appendix D contains a copy of the NOA.

5.2 Consultation and Stakeholder Coordination

5.2.1 Consultation

On June 10, 2025, VA initiated Section 106 consultation with the UT SHPO, Northwestern Band of the Shoshone Nation, Shoshone-Bannock Tribes of the Fort Hall Reservation, Ute Indian Tribe of the Uintah & Ouray Reservation, South Salt Lake City Planning Commission, Millcreek Planning Commission, Millcreek Historic Preservation Commission, and Utah Historical Society, as required under NHPA. The UT SHPO concurred that Alternative 1 would have no adverse effect to the historic site, pursuant to 36 CFR 800.5(b); and that Alternatives 2, 3, and 4 would have no historic properties affected, pursuant to 36 CFR 800.4(d)(1). See Section 3.6 for the detailed analysis and Appendix B for copies of all Section 106 correspondence.

5.2.2 Stakeholder Coordination

On December 20, 2024, VA electronically sent stakeholder scoping notification letters to the entities listed below. VA did not receive any comments in response to the scoping notice. Appendix D contains a copy of the scoping notice.

5.2.2.1 Federal Agencies

- U.S. Environmental Protection Agency, Region 8

5.2.2.2 State Agencies

- Utah State Clearinghouse
- Utah Department of Veterans' and Military Affairs

5.2.2.3 City Agencies

- Mayor Jenny Wilson, Mayor of Salt Lake County

5.2.2.4 Federally Recognized Tribes with Interests in Salt Lake County, UT

- Northwestern Band of the Shoshone Nation
- Shoshone-Bannock Tribes of the Fort Hall Reservation
- Ute Indian Tribe of the Uintah & Ouray Reservation, Utah

5.2.2.5 Environmental Organizations in Salt Lake County, UT

- Southern Utah Wilderness Alliance
- Breath Utah
- Friends of Great Salt Lake
- Great Salt Lake Audubon Society

5.2.2.6 Veteran Organizations in Salt Lake County, UT

- VFW Post 7442 West Valley-Kearns Post
- VFW Post 3586 Ben G. Russo Post
- VMA Salt Lake Metro Region

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