

Record of Decision

Reconfiguration of VA Black Hills Health Care System Environmental Impact Statement and Integrated Section 106 Consultation

1.0 Introduction and Summary of NEPA/NHPA Section 106 Process

As required by the *National Environmental Policy Act* (NEPA), the U.S. Department of Veterans Affairs (VA) identified, analyzed, and documented the potential physical, environmental, cultural, and socioeconomic impacts associated with the proposed reconfiguration of health care services within the VA Black Hills Health Care System (BHHCS) in the Final environmental impact statement (EIS) issued on November 10, 2016. The EIS is incorporated by reference in its entirety into this Record of Decision. VA BHHCS provides health care to approximately 19,000 Veterans over 100,000 square miles in western South Dakota, northwestern Nebraska, and eastern Wyoming.

1.1 Statutory and Regulatory Authorities

The EIS process was conducted in accordance with the *National Environmental Policy Act of 1969* (NEPA) (42 United States Code [U.S.C.] 4321 et seq.), the Council on Environmental Quality's (CEQ's) regulations for implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), VA's NEPA regulations titled "Environmental Effects of the Department of Veterans Affairs Actions" (38 CFR Part 26), and VA's "NEPA Interim Guidance for Projects" (VA 2010a). NEPA and these regulations require that VA, as a federal agency, evaluate the potential environmental impacts of the agency's major actions significantly affecting the quality of the human environment.

Section 106 of the *National Historic Preservation Act* (NHPA) (54 U.S.C. 30108) requires a federal agency to determine and consult on the effects of its undertaking on historic properties. The Hot Springs Campus of the VA BHHCS occupies the buildings constructed in 1907 as part of the Battle Mountain Branch of the National Home for Disabled Volunteer Soldiers. The Battle Mountain Sanitarium was recognized as a National Historic Landmark (NHL) in 2011 under Criterion 1 for its association with broad patterns of American History and Theme IV: *Shaping the Political Landscape*. The property also is a contributing element to the Hot Springs Historic District, a property listed in the National Register of Historic Places (NRHP). Nearly all buildings, structures, objects, and landscapes in the Hot Springs Campus are part of this historic district. Section 110 (f) of the NHPA requires a federal agency to exercise a higher standard of care when considering undertakings that may directly and adversely affect an NHL. The EIS substituted NEPA review for the Section 106 consultation process. CEQ's regulations direct agencies to integrate NEPA requirements with other planning and environmental review procedures (40 CFR 1500.2(c)), including those required by NHPA (40 CFR 1502.25(a)).

This integrated process complied with the Advisory Council on Historic Preservation (ACHP) "Procedures for the Protection of Historic Properties" (36 CFR Part 800), including the "Use of the

NEPA process for Section 106 purposes” (36 CFR 800.8(c)) and the joint CEQ-ACHP guidance *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106* (CEQ-ACHP 2013).

1.2 Purpose and Need

The **purpose** of VA’s proposal to reconfigure health care services in the VA BHHCS is to provide high-quality, safe, and accessible health care for Veterans well into the twenty-first century by:

- Providing locations and facilities that support VA’s efforts to enhance and maintain quality and safety of care in the 100,000-square-mile catchment area
- Ensuring facilities for Veterans receiving any services comply with accessibility requirements for handicapped individuals, support current standards of care, and can be well-maintained within available budgets and resources
- Increasing access to care closer to where Veterans reside
- Reducing out-of-pocket expenses for Veterans’ travel

VA has identified a **need** to reconfigure health care services in the VA BHHCS catchment area because:

- VA has difficulty maintaining high-quality, safe, and accessible care at the Hot Springs Campus.
- Existing locations and facilities constrain the quality of care, range of services, and access to care VA offers to Veterans in the catchment area.

The EIS analyzed impacts from the alternatives for the physical facilities from which health care services are offered within the VA BHHCS, and thus focused on decisions regarding the appropriate physical buildings and infrastructure required to provide the proposed reconfiguration of services. It was not within the scope of the EIS to determine the specific health care services that VA offers to Veterans at any location. These are decisions made by the Veterans Health Administration’s (VHA) leaders, planners, and health care practitioners to further the mission to “Honor America’s Veterans by providing exceptional health care that improves their health and well-being.”

1.3 NEPA and the Public Involvement Process

The public involvement process began with issuance of the Notice of Intent (NOI) in the Federal Register on May 16, 2014, announcing the preparation of an integrated EIS for the VA BHHCS reconfiguration proposal and the start of the public scoping period. VA BHHCS hosted 10 scoping meetings in 9 different communities throughout the service area between June 11 and 27, 2014. The public scoping period was open for 90 days from May 16 through August 16, 2014. Although not required by CEQ regulations implementing NEPA or by VA’s NEPA regulations or guidance, VA BHHCS hosted an open house in six communities within the service area between November 17 and 20, 2014, to update stakeholders on the EIS preparation status.

VA published the Notice of Availability (NOA) of the Draft EIS in the Federal Register, inviting public comments on the content of the document on October 30, 2015, and the Environmental Protection Agency (EPA) also published a NOA in the Federal Register on November 6, 2015, officially starting a 60-day public comment period. VA BHHCS hosted public comment meetings in six communities within the service area during the 60-day comment period. The public comment period was extended on four separate occasions, primarily in response to requests from the public and other stakeholders, including historic property consulting parties (consulting parties)

participating in the NEPA/NHPA substitution and consultation process and upon the advice of ACHP. A final extension was given to June 20, 2016 to provide for a 30-day review period following distribution of measures designed to mitigate the potential effects of the alternatives on historic properties. These are included in this Record of Decision (ROD). Responses to comments received during the comment period are provided in Appendix E of the Final EIS.

Comments on the Draft EIS were received from government agencies, consulting parties, Native American tribes, organizations, and individuals. The majority of substantive comments were submitted by Save the VA, National Trust for Historic Preservation, and other consulting parties under the NEPA/NHPA substitution process and related primarily to the NEPA process (e.g., timing of NEPA review), purpose and need (e.g., questioning VA's assessment of need), alternatives (e.g., range of alternatives, ability to meet purpose and need), impacts to historic properties and associated mitigation measures, and the NEPA/NHPA substitution process (e.g., flawed and ineffective). The majority of commenters were in opposition to the VA's Preferred Alternative, and supported continued operation of the existing Hot Springs Medical Center in some capacity, although many did not specify which Alternative they supported (i.e., Alternative C, E or F). However, of those that did specify, their support was for Save the VA's Alternative E. The Agency received no support for Alternatives B, C or D and only a few votes of support for Alternative A, which was identified as the preferred alternative in the Draft EIS.

The EPA published the NOA of the Final EIS in the Federal Register on November 10, 2016. Pursuant to 40 CFR 1506.10(b), VA waited 30-days after publication of this notice to make a final decision and issue this Record of Decision (ROD) on its reconfiguration proposal.

1.4 Summary of Historic Properties Consultation

By letter dated May 13, 2014, VA BHHCS formally notified ACHP, the Secretary of the Interior (through a National Park Service (NPS) representative), South Dakota State Historic Preservation Office (SHPO), and numerous other stakeholders (potential consulting parties) of its intent to integrate the NHPA Section 106 evaluation and consultation procedures into the NEPA EIS process. Nebraska and Wyoming SHPOs were extended invitations on September 24, 2014 but did not respond. VA identified other potential consulting parties through public scoping meetings, recommendations from other consulting parties, and requests from organizations. VA BHHCS conducted additional outreach to Native American tribes to participate as consulting parties. VA BHHCS hosted workshops and a teleconference with consulting parties between November 2014 and April 2015. Following publication of the draft EIS in October 2015, VA BHHCS hosted two additional consultation meetings, on January 21 and February 21, 2016, to discuss potential effects to historic properties as a result of the proposed reconfiguration.

Consulting Parties provided written communication throughout the consultation process, most notably following distribution of draft and revised draft measures to resolve adverse effects. These communications were considered to be part of the administrative record and are included in Appendix C, NEPA/NHPA Substitution Process, of the Final EIS.

The NHPA requires federal agencies to afford the ACHP an opportunity to comment on undertakings. On July 15, 2016, VA referred objections from four parties to the ACHP for an advisory opinion on whether the draft EIS released in October 2015 met the standards outlined for NEPA substitution for Section 106 of the NHPA. The ACHP responded to four areas of concern from the objecting parties to VA's compliance in a letter dated August 12, 2016.

- The ACHP did not agree with the first objection, and concluded VA had met its obligations to identify historic properties affected by the undertaking.
- The ACHP did not agree with the second objection, and concluded VA has provided a comprehensive assessment of effects to historic properties.
- The ACHP agreed with the third objection claiming VA did not “fully develop alternatives or propose adequate substantive measures to avoid, minimize, or mitigate adverse effects” following release of the draft EIS. VA disagrees with the ACHP opinion.
- The ACHP concurred with the fourth objection claiming VA efforts to resolve adverse effects to historic properties are inadequate. VA disagrees with the ACHP opinion.

VA summarized its comments to the ACHP opinion in a letter dated October 26, 2016. This letter documented that VA has taken into account the ACHP’s opinion about the objections raised regarding consultation for the proposed VA BHHCS reconfiguration and committed to addressing outstanding ACHP concerns in the Final EIS. This ROD was informed by the entire consultation process and further takes into account the ACHP advisory opinions of the sufficiency of the agency’s implementation of the NEPA substitution process.

2.0 Alternatives Analysis and Review

2.1 Alternatives Considered

Six alternatives, including two variations on one alternative (one of which is the preferred alternative) were evaluated in detail in the Final EIS as well as a supplement to five of the alternatives. The alternatives proposed different locations and combinations of facilities serving as a community-based outpatient clinic (CBOC), a multi-specialty outpatient clinic (MSOC), and a residential rehabilitation treatment program (RRTP) facility; expanding, renovating, or vacating existing facilities; and taking no action. They are summarized as follows:

- A. A-1. Hot Springs: new CBOC, cease services at existing VA campus
Rapid City: new MSOC (replacing leased CBOC) and 100-bed RRTP
- A-2. Hot Springs: new CBOC within Building 12 on existing VA campus
Rapid City: new MSOC (replacing leased CBOC) and 100-bed RRTP
- B. Hot Springs: new CBOC and 100-bed RRTP, cease services at existing VA campus
Rapid City: new MSOC (replacing leased CBOC)
- C. Hot Springs: new CBOC within Building 12 and 100-bed RRTP in domiciliary at existing VA campus
Rapid City: new MSOC (replacing leased CBOC)
- D. Hot Springs: new CBOC and 24-bed RRTP, cease services at existing VA campus
Rapid City: new MSOC (replacing leased CBOC) and 76-bed RRTP
- E. Save the VA Proposal
Hot Springs: renovations and construction to continue and expand inpatient and outpatient services at existing VA campus, including 110 (within existing domiciliary) to 160-bed RRTP
Rapid City: new MSOC (replacing leased CBOC)
- F. No Action

G. Supplemental alternative to A-1, A-2, B, C, or D for re-use of part or all of existing Hot Springs Campus

The new hybrid Alternative A-2 plus Supplemental Alternative G (A-2/G) was identified as the preferred alternative in the Final EIS.

2.2 Environmentally Preferable Alternative

Based on the potential environmental impacts identified in Chapter 4 and the available mitigation identified in Chapter 5, the environmentally preferable alternative is Alternative F, No Action. However, adoption of the No Action alternative does not meet VA's purpose and need as identified in the Final EIS.

3.0 Environmental Impact Analysis

The Final EIS includes an evaluation of the alternatives' direct, indirect, and cumulative environmental impacts for each resource area (Sections 4.1 through 4.15 of the Final EIS). Each section provides (1) the evaluation criteria by which the analysis determined whether there is an adverse impact to the resource, and (2) the analysis of impacts to that resource from each of Alternatives A through F and Supplemental Alternative G. Potential impacts from each alternative are discussed separately for construction (short-term impacts) and operation (long-term impacts).

The potential environmental impacts of each alternative are summarized in the Attachment to this ROD.

Because each of the proposed alternatives had the potential to adversely affect historic properties, including the Battle Mountain Sanitarium National Historic Landmark, the evaluation of cultural resources, notably historic properties, is addressed further below.

3.1 Cultural Resources, Notably Historic Properties

For purposes of analysis under the NEPA, cultural resources encompass "historic properties" as defined in the NHPA, "archaeological resources" as defined in the Archaeological Resources Protection Act, and "cultural items" as defined in the Native American Graves Protection and Repatriation Act. NEPA provides an overarching consideration of the human environment to address these cultural, historic, and archaeological resources, properties, and items (collectively referred to as "cultural resources" herein). "Historic properties" defined by the NHPA are any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. A historic property may include artifacts, records, and remains related to and located within such property, and properties of traditional religious and cultural importance to an Indian tribe that meet the NRHP criteria. Impacts to cultural resources were considered and analyzed in the Final EIS; however, the majority of impacts, notably adverse impacts, were to historic properties.

3.2 Areas of Potential Effect

Implementation of Alternative A-2/G has the potential to affect historic properties within the boundaries of the Hot Springs VA campus, within the Town of Hot Springs, and within Rapid City. Due to Consulting Party comments, VA also added the Battle Mountain Landform and the Fort Meade VA campus to the Areas of Potential Effect (APE). A full description and map of each APE is included in Section 3.3 of the Final EIS.

3.3 Identified Historic Properties

There are 22 historic properties within the Hot Springs APE (ARC 2016l NRHP 2016).¹ Of these, two are anticipated to be directly affected by implementation of Alternative A-2/G: the Battle Mountain Sanitarium, a National Historic Landmark (NHL); and the Hot Springs Historic District.

- The Hot Springs VA campus includes the Battle Mountain Sanitarium of the National Home for Disabled Volunteer Soldiers. The Secretary of the Interior designated the Battle Mountain Sanitarium as a NHL in 2011, under NHL Criterion 1 for its association with events that have made a significant contribution to our past; and NHL Theme IV, shaping the political landscape: governmental institutions, as a national example of Health/Medicine.
- The Battle Mountain Sanitarium is a contributing element to the Hot Springs Historic District, a property listed in the NRHP under *Criterion A: Commerce* as a commercial district and nineteenth century “spa town” and under *Criterion C: Architecture* for its representation of local sandstone construction techniques.

The Black Hills region is important in the heritage and traditions of Native American peoples who live or customarily lived in the region. The entire Black Hills landmass (“He Sapa” to some Siouan peoples) is sacred within certain Native American traditions (Sundstrom 1996). VA considers the Hot Springs sacred site area, with Battle Mountain interconnected, as a historic property of religious and cultural importance to Native American tribes with ancestral, aboriginal, or ceded land ties to the Black Hills Region.

The Rapid City APE includes 36 historic properties currently listed in the NRHP, 8 NRHP eligible archaeological sites, 247 NRHP eligible built resources, and 7 Future NRHP eligible building resources (ARC 2016; NRHP 2016). The effects of construction of the proposed MSOC and RRTP in Rapid City are unknown at this time. VA will select a site in accordance with federal laws and its own Directives; VA will follow any stipulations included in this ROD and, if appropriate, proceed in consultation in accordance with 36 CFR §800.3-6.

The Fort Meade VA campus is a recognized historic district and a site of archaeological potential. ~~No physical changes to the VA Fort Meade campus are planned as part of the proposed~~ reconfiguration of services and facilities within the VA BHHCS. Consequently, no historic properties within the VA Fort Meade campus would be affected by the proposed reconfiguration. The Fort Meade medical center is active, with a two-story addition recently completed for the North Wing, and has the potential to require further modifications in the future in order to conform to modern healthcare needs. Such ongoing or future undertakings are not related to the implementation of Alternative A-2/G.

3.4 Adverse Effects of Alternative A-2/G on Historic Properties

Implementation of Alternative A-2/G has the potential to directly adversely affect the setting, feeling and association of the Battle Mountain Sanitarium and the Hot Springs Historic District. Change in use of a large part of the property would be an adverse effect to the setting, feeling and association of the property, and thus an adverse effect to each of the historic districts. If an alternate VA use, or use by another federal agency, is not identified for redevelopment of the balance of the campus, or if substantive preservation easements are not imposed on the balance of the campus for future development, this alternative would also represent a direct adverse effect that threatens the

¹ Note- historic districts are included as a single property.

long-term preservation of the property. Additionally, if the Secretary of Interior's *Standards for Preservation* and/or *Standards for Rehabilitation* are not followed in the physical changes that flow from selecting this alternative, additional adverse effect is possible.

If identification and implementation of an adaptive re-use for the portions of the Hot Springs VA campus is not successful, there is potential for additional adverse effects, notably deterioration of the contributing elements of the Battle Mountain Sanitarium. Some level of deterioration, in spite of implementation of a long-term preservation plan that exceeds the NPS recommended guidelines for mothballing, is an identified potential effect of this supplemental alternative. Resolution of this adverse effect is included in this ROD. Demolition of buildings that have deteriorated past the point of fiscally responsible rehabilitation and/or safety protocols is a possibility; however, demolition of the buildings is not an undertaking evaluated in the Final EIS. Additional consultation and analysis will be required prior to any demolition resulting from vacancy and/or deterioration.

4.0 Decision

As a result of public input and analysis found in the Final EIS and with the implementation of identified management and mitigation measures to minimize impacts, VA has determined to implement Alternative A-2, the preferred Alternative, plus Supplemental Alternative G, re-use of part or all of existing Hot Springs Campus. Alternative A-2/G includes the following elements:

- Expansion of the number of provider options available to Veterans through the care in the community program, including an increase in the level of case management and coordination services offered to Veterans;
- Renovation of Building 12 on the existing Hot Springs Campus to provide a new and updated CBOC, thereby allowing VA to maintain a limited presence on campus;
- Continued search to identify and approve appropriate re-use of the Hot Springs Campus.
- Construction of an MSOC and 100-bed RRTP facility in Rapid City.

5.0 Agency Preference and Factors in Decision

VA's decision is based upon the analysis of potential impacts presented in the Final EIS and its conclusion that Alternative A-2/G meets VA's purpose and need and is fully consistent with the Agency's mission to provide high-quality, safe and accessible health care for Veterans well into the twenty-first century. In addition to offering a new and updated CBOC in Hot Springs and a new MSOC in Rapid City, it offers expanded providers and services under the Care in the Community Program (which help reduce travel distance and associated out-of-pocket expenses). It also offers a RRTP facility that fully meets the current VA standards for residential treatment with respect to VA's Mental Health Facilities Design Guide (VA 2010b). The proposed RRTP location in Rapid City is not only consistent with the VA mental health design guide's principle relating to community reintegration, but the more urban setting also offers a wider array of services that VA believes help improve the quality of care and provide greater opportunities for successful treatment and community reintegration. Overall, Alternative A-2/G better serves the ever changing health care needs of the VA BHHCS Veteran population, and provides safe and appropriate facilities for health care services.

Alternative A-2/G is also consistent with health care strategies laid out in VA's and VHA's national Blueprint for Excellence (2014), which include evolving from a hospital-centric model to becoming an integrated network of services offering a range of care settings organized around Veterans' needs,

not VHA's, to help ensure better health, better care, and better value. VA is committed to a model of service that transforms VHA health services from being provider-centric to being Veteran-centric. A vital element to this transformation is fostering new relationships with non-VA care and service providers and other national, state and local organizations whose services can benefit Veterans. The expanded Care in the Community program now available to eligible Veterans introduces new opportunities to provide care beyond the physical limits of VHA facilities, to allow Veterans safe, timely, efficient and coordinated services outside of VA and closer to their homes. This is an important element of the proposed reconfiguration and preferred Alternative A-2/G.

At the same time, VA recognizes and appreciates the NHL status of Battlefield Mountain Sanitarium and the significant role the hospital and VA have played in the Hot Springs community over the past 100 years. VA also recognizes its obligations under NHPA Section 100 (f), requiring that, to the maximum extent possible, VA undertake such planning and actions as may be necessary to minimize harm to such landmark. The overwhelming and extended public outcry over the potential closure of this facility and the resulting adverse effects it would have on the local economy and historic properties, has had an impact on VA's initial position regarding the selection of Alternative A (now A-1 in Final EIS), which included new construction for an off-campus CBOC in Hot Springs, as the preferred alternative in the Draft EIS.

As a result, VA has thoroughly revisited its earlier assumptions and findings and agrees that there are ways to renovate and rehabilitate the existing structures to meet existing federal (i.e., Americans with Disabilities Act, Architectural Barriers Act) and internal VHA guidelines (Recovery Model of Care). VA agreed to analyze a new alternative identified by consulting parties during the public comment period on the Draft EIS that included an on-campus component, new Alternative A-2/G. While the renovation costs are significantly higher than the new construction alternatives, VA has selected Alternative A-2/G because it (1) avoids some adverse effects and minimizes others, (2) fully meets purpose and need and the Agency's mission goals with respect to Veteran health care, and (3) helps preserve our nation's irreplaceable historic resources, through the reuse of historic buildings and maintaining a VA presence on the historic campus. Any implementation of decision is dependent upon amendment of FY17 Continuing Appropriations Act, PL 114-223 – Section 240.

Each of the proposed alternatives had the potential to adversely affect historic properties, including the Battle Mountain Sanitarium NHL; Alternative A-2/G does more to minimize adverse effects to historic properties than other alternatives that met the stated Purpose and Need. However, implementation of Alternative A-2/G has the potential to adversely affect historic properties on the Hot Springs VA campus, within the Town of Hot Springs, and within Rapid City. VA has committed to the measures to avoid and/or minimize effects when possible, and to mitigate the adverse effects when avoidance and/or minimization will impede VA's ability to perform its mission of providing quality healthcare to Veterans.

6.0 Avoiding or Minimizing Environmental Harm

6.1 Statement Regarding Adoption of All Practicable Means to Avoid or Minimize Environmental Harm

VA has adopted all practicable means to avoid or minimize environmental harm from the selected Alternative A-2/G. The measures and best practices identified in the Final EIS include measures that are incorporated into an alternative; compliance with federal, state, and local regulatory requirements; best management practices incorporated into an alternative; and additional VA-proposed protective measures. This ROD binds VA to implement specific mitigation commitments

stated in the ROD. Additionally, this ROD sets forth monitoring activities VA will undertake to ensure complete implementation of identified mitigation measures.

This ROD is subject to the Anti-Deficiency Act (31 U.S.C. Section 1341). VA's responsibilities to implement any actions under Section 6.0 are contingent upon the availability of appropriated funds from which payment, if any, can be made. Should funds not be available to allow VA to meet its responsibilities under Section 6.2.2, VA shall resume consultation to resolve unfunded measures pursuant to 36 CFR §800.4 through §800.7, as applicable.

6.2 Binding Commitment to Measures to Avoid, Minimize, or Mitigate Adverse Effects of Implementation of Alternative A-2/G

6.2.1 Measures Addressing Impacts to Resources Other than Cultural Resources

The potential adverse impacts to employment associated with the reduction in the number of full-time equivalent employees needed to operate VA facilities would be minimized through VA retraining efforts, if needed, to provide every employee with the option for placement in another VA facility, where possible, and transfers to other positions within the VA BHHCS service area; eligible retirements and offers for voluntary early retirements and buy-outs.

6.2.2 Measures Addressing Impacts to Cultural Resources, Notably Historic Properties

VA developed the following measures to resolve adverse effects in consultation with consulting parties in live meetings and through written communications. Vacation of healthcare services from portions of the VA Hot Springs campus will result in a greater adverse effect to the historic property and therefore carry more measures to resolve the effect. Resolution of the effect does not necessarily mean avoidance or minimization; Federal agencies also may mitigate the effects.

- a. VA shall provide written reports via email to all consulting parties about the implementation of measures to resolve adverse effects to historic properties every six months from the date of execution of this ROD until all measures have been enacted or for at least ten years. ~~These semi-annual reports will be posted to the consultation website that is already in place for this project.~~
- b. VA shall host annual meetings with consulting parties to update them about the implementation of measures to resolve adverse effects to historic properties. These meetings will continue for at least 5 years.
- c. Within 120 days of issuing the ROD, VA shall develop and email a timeline of major milestones with deadlines for implementing each measure to all consulting parties.
- d. Historic preservation measures, including architectural design, carried out pursuant to this undertaking shall meet the Secretary of the Interior's (SOI's) Standards for Archaeology and Historic Preservation (www.nps.gov/history/local-law/arch_stnds_0.htm), taking into account the suggested approaches to exterior rehabilitation and new construction in the SOI's Standards for Treatment of Historic Properties. New construction off the VA Hot Springs campus, will require additional consultation pursuant to 36 CFR § 800.
- e. VA shall ensure that all historic preservation mitigation measures carried out pursuant to this ROD shall be done by or under the direct supervision of historic preservation professionals who meet the SOI's Professional Qualifications Standards (www.nps.gov/history/local-law/pqs_0.htm).

law/arch_stnds_9.htm). VA shall ensure that consultants retained for services pursuant to this ROD meet these standards.

- f. VA shall not re-number or otherwise change the existing campus building numbers. New construction shall not copy any extant or past building numbers.
- g. VA shall assign a Dedicated Project Manager (DPM) at the Network level or higher within VA to coordinate, monitor, and report on progress implementing the historic preservation mitigation measures outlined in this ROD. This individual will have at least three years of project management experience and be experienced in the treatment of historic buildings or districts. This individual will serve as the direct point of contact with consulting parties and the public for matters related to preservation mitigation.
 - a) Preference shall be given to an individual who meets the SOI standards in Architecture or Architectural History.

6.2.2.1 Measures to Avoid or Minimize Adverse Effects, Including Potential Future Effects

- a. VA shall follow the tenets of the NHPA and its implementing regulations at 36 CFR §800 to select a site and prepare that site for any construction in Rapid City.
- b. When new construction on campus could affect the exterior of a building, or if the construction could have an effect on the campus district, this construction would normally trigger additional consultation under 36 CFR § 800; however, VA and its development partners shall instead work with a Design Review Committee (DRC) to avoid and minimize the adverse effects of said construction on historic properties. This construction could include non-recurring maintenance projects, (which could contain infrastructure improvements), renovation projects, and new construction projects on the Hot Springs campus associated with this alternative.
 - ~~a) VA shall invite the South Dakota SHPO, the NPS, and the Hot Springs Historic Preservation Commission to become members of the Design Review Committee~~
 - b) VA and its partners shall notify the DRC of plans for new construction prior to initiating design development documents.
 - i. VA shall include the intended scope of work in the notification.
 - ii. VA and its partners shall take into account comments from the DRC in finalizing the scope of work and schematic designs.
 - c) VA and its partners shall submit draft schematic designs to the DRC for review and comment. All parties to the DRC shall have 21 days to review the draft schematic designs and provide comments on ways to improve the design to best minimize effects to contributing elements to the Battle Mountain Sanitarium.
 - i. VA shall respond to DRC comments in writing, by conference call, or in person. The terms of response shall be the purview of VA BHHCS.
 - d) Following response to comments, VA and its partners may proceed with design and construction so long as all requirements of this ROD governing the protection of archaeological properties have been met.

- c. VA shall conduct an archaeological survey in areas planned for ground disturbance related to new construction on the Hot Springs campus, to identify archaeological properties and to determine the eligibility of any discovered archaeological sites for listing in the NRHP.
 - a) VA shall notify the South Dakota SHPO, the NPS, and Native American tribes that have potential traditional, historic, or current ties to the VA BHHCS service area of the survey at least seven days prior to initiating it.
 - b) VA shall invite the South Dakota SHPO and the NPS to consult on determinations of eligibility for all identified archaeological loci not related to Native American lifeways and cultural practices. VA shall invite the South Dakota SHPO, the NPS, and all Native American tribes that have potential traditional, historic, or current ties to the VA BHHCS service area to consult on determinations of eligibility for all identified archaeological loci related to Native American lifeways and cultural practices.
 - c) If archaeological properties are identified and determined to be eligible for listing in the NRHP, VA shall follow the tenets of the NHPA and its implementing regulations at 36 CFR §800 to avoid, minimize, or resolve adverse effects.
- d. If any historic building on the Hot Springs campus shall be unoccupied for a period of at least three months, VA shall develop a comprehensive plan for the long-term preservation of such buildings.
 - a) VA shall hire an SOI-qualified historic architect with experience in mothballing plans to design and oversee this comprehensive plan. This plan will be in keeping with the standards outlined in NPS Preservation Brief 31, "Mothballing Historic Buildings."
 - i. Preference shall be given to an individual or team that has experience developing plans for the preservation of multiple unoccupied historic buildings.
 - ii. This plan shall address any stabilization issues and include a schedule of preservation and inspection, full system monitors, onsite security, emergency repairs such as for damage from a fire or roof collapse, a plan for building interiors, a plan for the campus landscape, and annual consultation with the South Dakota SHPO and the NPS.
 - b) VA shall provide a draft plan to the consulting parties for a 30-day review and comment period, highlighting any deviations from the recommendations in Preservation Brief 31.
 - c) VA shall take into account the comments from the South Dakota SHPO and NPS when finalizing the plan.
 - d) VA shall forward a copy of the final plan to the South Dakota SHPO and NPS.
 - e) This plan shall make explicit reference to other federal agency experiences with preserving historic buildings in an unoccupied state, as well as specific experiences with maintaining historic buildings in South Dakota and similar climates.
 - f) VA recognizes the importance of fully funding a comprehensive program for the maintenance of unoccupied historic buildings. VA also recognizes the extraordinary cost of preserving large historic campuses and acknowledges that such cost is not

easily absorbed in an annual maintenance budget. VA will include costs for non-recurring maintenance and repair of the unoccupied buildings, in VA's annual Strategic Capital Investment Plan (SCIP) ten-year planning process, with emphasis on the priority of such non-recurring maintenance and repair given by BHHCS and VISN 23. VA shall seek funding at least annually for recurring maintenance and repair of the unoccupied buildings. VA shall include in its required six month written reports to all consulting parties, the results of any and all of VA's efforts to seek such funding.

- g) The plan shall include annual inspections, which will be open to the South Dakota SHPO and the NPS, and recorded in reports to the consulting parties.
 - i. Once the majority of Buildings 1, 2, 5, 6, 7, 8, 9, 10 and 11 of the campus have closed, preservation of the campus according to the tenets of the comprehensive plan will continue for a minimum of five years.
 - ii. After these five years, VA, in consultation with ACHP, NPS, South Dakota SHPO, and the Town of Hot Springs, may elect to renew the comprehensive plan for a period not to exceed five additional years. If VA elects to renew the comprehensive plan, this plan must be updated by an SOI-qualified historic architect, to account for extant conditions.
 - iii. If, after either five (if VA does not renew the comprehensive plan) or ten (if VA renews the comprehensive plan) years, VA elects not to renew the comprehensive plan for the preservation of historic buildings, VA shall re-engage in consultation with respect to the VA Hot Springs campus, following the tenets of the NHPA and its implementing regulations at 36 CFR §800. This process must be initiated prior to the end of the comprehensive preservation plan implementation.
- e. The DPM shall work with the VHA Historian, the Hot Springs Historic Preservation Commission, the South Dakota State Museum, and the South Dakota State Archives to find a suitable display location for VA-owned materials currently in the Battle Mountain Sanitarium Museum.
 - a) VA may loan commemorative materials in accordance with federal law and VA protocols.
 - b) VA is not obligated to care for materials owned by other agencies or private citizens currently on display in the Battle Mountain Sanitarium Museum.
 - c) Neither VA nor the Hot Springs Historic Preservation Commission will be monetarily obligated to fund a new display.
 - d) If an appropriate site cannot be found within the Town of Hot Springs, VA may look at other VA sites or pursue an agreement with the South Dakota State Museum or State Archives.
- f. VA shall develop and implement a marketing strategy to identify redevelopment partners.
 - a) VA shall develop a vigorous process to identify possible redevelopment partners for the unused portion of the Battle Mountain Sanitarium campus. This process will include alternative VA uses, other federal agency uses, state or local government uses, Native American uses, and private developer projects, as well as mixed use or

multiuser coalitions. VA shall seek input from the South Dakota SHPO, ACHP, National Trust for Historic Preservation, and NPS in developing this redevelopment process and will examine available public-private partnership authorities such as an enhanced-use lease and NHPA Section 111 leasing. This process will be distributed to consulting parties via email within 120 days of issuance of this ROD.

- b) VA shall establish an Integrated Project Team (IPT) at appropriate levels across the VA enterprise to evaluate possible alternative VA uses of the unused Battle Mountain Sanitarium campus that are not related to the direct delivery of Veteran health care services. The DPM will serve on the IPT. This process will include outreach to VHA programs that deliver administrative support services, Veterans Benefit Administration programs, National Cemetery Administration program needs, and VA staff office needs. This process will be documented, continue through the period of transition for the campus, and be reported in, at minimum, reports to the consulting parties on a semi-annual basis. Additionally, VA will accept comments and suggestions on the marketing plan within 30 days of reporting. As necessary, the IPT will present decision points to Secretary of the VA (Secretary) or his/her designee.
- c) The IPT will be composed of VA employees from several departments within VA including, but not limited to, the Office of Asset Enterprise Management, the Office of Construction and Facilities Management (including the Federal Preservation Office and Real Property Service), VISN 23, and the DPM. Members will be selected for their experience and areas of expertise.
- d) To the extent the Secretary determines to seek an external user for a portion of the campus, VA shall either seek a federal agency partner who can take over the property, or engage the General Services Administration (GSA) in the property excessing process. The first step in either process is to satisfy requirements under the *McKinney-Vento Act* as to offering the campus for homeless housing.
- e) Steps taken to identify federal partners shall include: correspondence from Secretary ~~to federal agency officials~~, consultation and outreach to federal preservation officers, and consultation and outreach to federal real property acquisition personnel. While this outreach work may be facilitated by a contractor, the process will remain the responsibility of VA. This process will be documented, continue through the period of transition for the campus, and be reported in, at minimum, reports to the consulting parties.
- f) If VA determines that it will excess any of the unused portions of the campus through GSA, GSA shall follow its own disposal process, subject to the requirements of the NHPA.
- g) If VA chooses to excess or dispose of any of the unused portion of the campus, VA shall require preservation conditions be attached to the property.
- h) Disposal preservation conditions will include, at minimum, required consultation with local tribal representatives and other appropriate consulting parties, required SOI-qualified personnel to plan and oversee any construction projects, archaeological studies overseen by SOI-qualified personnel where any ground disturbance will take place, adherence to the SOI Standards for the Treatment of Historic Properties, a process to account for unexpected discoveries that is consistent with 36 CFR

§800.13, and a process of annual reporting and consultation with the South Dakota SHPO and the NPS for a period of at least five years from the date of transfer.

6.2.2.2 Measures to Mitigate Adverse Effects

- a. Following publication of the ROD, and until portions of the Hot Springs campus are transferred to another entity or the campus buildings are preserved in accordance with the comprehensive preservation plan, VA shall make available to a local group or organization the greenhouse, so that group may determine if it is feasible to reactivate, operate and maintain it, and to use it to grow vegetation for the campus or town landscape.
- b. VA shall seek to develop a programmatic agreement for routine maintenance of the historic Ft. Meade and Sioux Falls VA-owned facilities in consultation with the South Dakota SHPO and the ACHP.
- c. VA shall support the Hot Springs Historic Preservation Commission to complete an application for the Preserve America program for the town of Hot Springs.
 - a) This support may include, but is not limited to, technical assistance, staff support, shipping fees, copy fees, and photography.
- d. VA shall host an annual reunion for patients, staff, and other community residents to commemorate the history of the Battle Mountain Sanitarium and celebrate the service of the residents of Hot Springs to our nation and our nation's Veterans.
 - a) During this reunion, VA shall establish an oral history booth/tent so participants may record oral histories.
 - i. VA shall utilize a qualified historian to oversee development of the oral history program.
 - ii. VA, in coordination with the Hot Springs Historic Preservation Commission and other interested consulting parties, shall develop a plan to annually record oral histories of patients, Veterans, staff members, and community residents related to the history of the Battle Mountain Sanitarium and the spirit of service in the Hot Springs area.
 - iii. VA shall solicit assistance from the local schools to develop questions and transcribe all recorded histories.
 - iv. VA shall archive at least one copy of the digital oral histories and the transcripts at the South Dakota State Archives and one copy with a publically-accessible archive in Hot Springs.
 - b) VA shall host this annual event for at least five years following publication of this ROD. VA will host the annual event within the boundaries of Hot Springs.
 - c) During the annual reunion, VA shall host an annual meeting with consulting parties to update them about the implementation of measures to resolve adverse effects to historic properties. These meetings will continue for at least 5 years.
- e. Within applicable laws and regulations, VA shall produce or contract for the production of, a book about the historical significance of the Battle Mountain Sanitarium/VA Hot Springs campus, the Hot Springs Historic District, and the spirit of service to country in Hot Springs

- a) This book shall be authored by a professional writer with experience writing commemorative history books; it shall not exceed 300 pages. This book shall contain photos of the Battle Mountain Sanitarium prior to implementing any mothballing plan. At least one chapter of the book will be devoted to the National Homes for Disabled Volunteer Soldiers. This book shall include information gathered from the oral history project established at the annual Battle Mountain Sanitarium/VA Hot Springs reunions.
- b) VA shall provide the consulting parties an opportunity to review and comment on the book outline and text. The consulting parties may provide documentation of the Battle Mountain Sanitarium at their discretion to support VA in development of the book.
- c) VA shall develop an e-reader version of the book, and make it available commercially
- d) VA shall produce or contract for the production of not less than 250 copies and not more than 2,500 copies of the book. Any profits realized by the sale of this book will be managed in accordance with applicable laws and regulations.
- f. VA shall create a photographic display related to the history of the Battle Mountain Sanitarium and the importance of the mineral springs in Hot Springs in a public area of Building 12 or any new construction associated with this Alternative.
 - a) This photographic display is intended to be a documentation of Battle Mountain Sanitarium through the years, and shall include at least three photographs of the Battle Mountain Sanitarium prior to executing this ROD. There is no limit on the number of historical photos that may be included in this display.
 - i. VA shall accept photograph recommendations from the South Dakota SHPO and the NPS, as well as other consulting parties.
 - ii. All photographs shall be fully labeled, cited, dated, and archivally stable to allow for VA scanning.
- g. VA shall develop a mobile application ("app") to memorialize the Battle Mountain Sanitarium.

 - a) This app shall include historic photos of the campus, oral histories, and historic context related to the Battle Mountain Sanitarium. VA shall reference the design and purpose of the app designed for the Clement J. Zablocki Veterans Affairs Medical Center (Milwaukee VAMC)/Northwestern Branch of the National Home for Disabled Volunteer Soldiers.
 - b) This app shall be made available to the public, free of charge (excluding personal user fees as charged by the user's service provider), prior to VA closing the majority of buildings 1-11 of the Battle Mountain Sanitarium campus and remain available for a period not less than three years.
 - c) The app platform compatibility shall be determined at the time of development based on current industry standards.
 - d) Once completed, no updates to the app shall be planned.
- h. VA shall support the Hot Springs Historic Preservation Commission in an effort to complete a re-survey of the Hot Springs Historic District and submit an amendment to the NRHP nomination to the South Dakota SHPO for consideration.

- a) This support may include, but is not limited to, hiring an SOI-qualified historic preservation consultant, advertising for volunteer photographers, and printing/shipping costs. VA shall not provide more than \$10,000 in monetary or in-kind support.
- i. VA shall allow the Hot Springs Historic Preservation Commission to submit photographs of the VA BHHCS Hot Springs Campus for inclusion in the amended NRHP nomination. The Hot Springs Historic Preservation Commission shall request access not less than 14 days prior to the intended survey. VA BHHCS staff will accompany the photographer to ensure all patient privacy requirements are met.
- j. VA shall conduct a Level I Historic American Buildings Survey (HABS) of all buildings that contribute to the Battle Mountain National Historic Landmark District that have not been recorded to HABS standards. This study will consist of laser scanning, rather than measured drawings, and large format, high resolution digital photography. The digital products of this survey will be made available locally at an appropriate repository, as well as with the State Archives, the South Dakota SHPO and the NPS.
- k. VA shall conduct a Historic American Landscape Survey (HALS) Level II survey of the Battle Mountain National Historic Landmark District, since the documentation necessary to produce a Level I survey is not believed to be extant.

6.3 Monitoring and Enforcement for Mitigation

The DPM will coordinate, monitor, and report on progress implementing the historic preservation mitigation measures outlined in this ROD.

6.3.1 Availability of Monitoring Program Information

This ends Section 6, Avoiding or Minimizing Environmental Harm. Section 7, Signature and Commitment, begins on the next page.

7.0 Recommendation and Decision

7.1 Recommendation

I recommend approval of VA's alternative A-2/G for the proposed reconfiguration of health care services within the VA Black Hills Health Care System. The decision would be subject to the terms, conditions, stipulations, and environmental protection measures reflected in this Record of Decision.

Elliott, Glenn (CFM)

Digitally signed by Elliott, Glenn (CFM)
DN: cn=Elliott, Glenn (CFM),
email=glenn.elliott@va.gov, o=Veterans Affairs
Date: 2016.12.30 12:18:41 -0500

12/30/2016

Glenn Elliott

Date

VA National Environmental Policy Act (NEPA) Implementation Officer
U.S. Department of Veterans Affairs



12/28/2016

Sandra L. Horsman, MBM

Date

Director, VA Black Hills Health Care System
U.S. Department of Veterans Affairs

Murphy, Janet

Digitally signed by Murphy, Janet
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12.29.16

Janet P. Murphy, MBA

Date

Director, VA Midwest Health Care Network (VISN 23)
U.S. Department of Veterans Affairs



JAN 3 2017

Stella Fikes, AIA

Date

Executive Director, Construction and Facilities Management
U.S. Department of Veterans Affairs

7.2 Decision

It is my decision to approve and implement alternative A-2/G for the proposed reconfiguration of health care services within VA Black Hills Health Care System. This decision is subject to the terms, conditions, stipulations, and environmental protection measures reflected in this Record of Decision.



Robert A. McDonald

VA Secretary

U.S. Department of Veterans Affairs

JAN 3 - 2017

Date

Attachment: Table 1: Summary of Impact Analysis

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Meets purpose of and need for action	Yes	Yes	No	No	Yes	No	No	Not applicable
Estimated 30-year cost (new construction)	\$148,622,461	\$217,103,464	\$168,234,767	\$229,838,861	\$176,040,980	\$217,036,697 [+\$additional 48,409,410 now added in for Rapid City MSOC]	\$215,082,431	Would vary based on use
Aesthetics	Presence of construction equipment could temporarily obstruct views, affect visual quality, and cause nighttime light trespass. VA facilities could permanently change visual appearance of site; create noticeable contrast to surrounding views; and cause nighttime illumination, glare, or light trespass.		Similar to Alternative A, with impacts slightly less for Rapid City due to smaller facility footprint.	No impacts to visual quality of VA Hot Springs Campus during construction. Construction and operation impacts for Rapid City similar to Alternative B.	Similar to Alternative A, with impacts slightly more for Hot Springs and slightly less for Rapid City.	Similar impacts to Alternative A, but would occur on VA Hot Springs Campus.	Similar to Alternative C for VA Hot Springs Campus; no impacts for Rapid City CBOC.	Similar to Alternative E.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Air Quality	<p>Construction and operation emissions would comply with all permit requirements and regulations, ensuring negligible impacts. Particulate emissions during construction would be below the <i>de minimis</i> threshold level. Decreased mobile source emissions due to improved geographic access to care.</p> <p>A-2: less short-term emissions from construction than Alternative A-1 since no new construction of CBOC in Hot Springs.</p> <p>Greenhouse gas emissions</p> <p>Greenhouse gas emissions expected to be negligible from construction; emissions from operation not expected to result in adverse regional impacts from climate change.</p>		Similar to Alternative A.	Impacts similar to but less than those from Alternative B. Less short-term emissions from construction than Alternative A or B.	Constructing and operating two RRTPs would result in increased emissions compared to Alternatives A and B, but impacts would otherwise be similar. Compliance with all permit requirements and regulations would ensure negligible impacts.	Short-term minor impacts during construction on the Hot Springs Campus. impact similar to or slightly greater than Alternative F, with all existing facilities plus new building(s) on the Hot Springs Campus. Compliance with all permit requirements and regulations would ensure negligible impacts.	No or minimal construction impacts due to mostly interior renovations as budget allows. Ongoing operational emissions continue at current levels; continued regulatory and permit compliance would ensure negligible impacts.	Construction and operation impacts similar to Alternatives C, E, or F, depending on the extent of renovation or construction and the nature and intensity of activities from specific re-use.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Cultural Resources and Historic Properties	<p><u>On-campus (A-1 and B):</u> Change in use of VA Hot Springs campus would diminish historic character of National Historic Landmark and affect setting and association of Historic District.</p> <p><u>On-campus (A-2):</u> Similar to Alternative A, except change in use of only some campus buildings and no effect to historic setting. Exterior and interior renovations could alter historic features.</p> <p><u>Off-campus:</u> Ground disturbance could encounter and remove archaeological and cultural materials. Construction introduces audible and visual elements to historic setting. Could affect the Hot Springs Historic District.</p>		<p><u>On-campus:</u> Similar to Alternative A-2.</p> <p><u>Off-campus:</u> Similar to Alternative A, except affects only Rapid City.</p>	<p><u>On-campus:</u> Similar to Alternative A-1.</p> <p><u>Off-campus:</u> similar to Alternative A-1.</p>	<p><u>On-campus:</u> Exterior and interior renovations, new construction could alter historic features. Ground disturbance could encounter archaeological and cultural materials. Construction introduces audible and visual elements to historic setting.</p> <p><u>Off-campus:</u> Potential viewshed concerns for Hot Springs Historic District</p>	<p><u>On-campus:</u> Actions to maintain or upgrade campus buildings could alter historic features.</p> <p><u>Off campus:</u> None.</p>	<p><u>On-campus:</u> Similar to Alternative E. Change in use of campus would diminish historic character of National Historic Landmark.</p> <p><u>Off-campus:</u> Similar to Alternative E.</p>	

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Geology and Soils	<p>Minor and short-term erosion and sedimentation potential during construction; would be minimized with best management practices and permit compliance. Possible impact to prime or unique farmland depending on locations. No impacts from operation.</p> <p>A-2: Potential for construction impacts similar to but less than Alternative A-1 due to decreased total ground area disturbed for new construction.</p>		<p>Potential for construction impacts similar to but slightly higher than Alternative A due to slightly increased total ground area disturbed for new construction.</p>	<p>Potential for construction impacts similar to but less than Alternative A due to decreased total ground area disturbed for new construction.</p>	<p>Potential for construction impacts similar to but higher than Alternative A due to increased total ground area disturbed for new construction.</p>	<p>Potential for construction impacts similar to but much less than Alternatives A, B, or C due to likely smaller total ground area disturbed for new construction.</p>	<p>Potential for construction impacts similar to or less than Alternative C; would occur only in the case of exterior modifications requiring ground disturbance.</p>	<p>Construction impacts similar to or less than Alternative E, depending on the extent of renovation or construction.</p>

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP?	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Hydrology and Water Quality	Minor and short-term spill, erosion, and sedimentation potential during construction; would be minimized with best management practices and permit compliance. Water supply and wastewater generation within capacity of existing sources / systems.	A-2: Potential for construction impacts similar to but less than Alternative A-1 due to decreased construction footprint.	Potential for construction impacts similar to but slightly higher than Alternative A due to slightly increased construction footprint. Water supply and wastewater generation within capacity of existing sources / systems.	Potential for construction impacts similar to but less than Alternative A due to decreased construction footprint. Water supply and wastewater generation within capacity of existing sources / systems.	Potential for construction impacts similar to but higher than Alternative A due to increased construction footprint. Water supply and wastewater generation within capacity of existing sources / systems.	Potential for construction impacts similar to but much less than Alternatives A, B, or C due to small construction footprint. Water use and wastewater generation would be greater than Alternative F, and would also be met with existing capacity.	Potential for construction impacts similar to or less than Alternative E; would occur only in the case of exterior modifications requiring ground disturbance. Current rates of water use and wastewater generation would continue, within capacity of existing sources / systems.	Construction and renovation impacts similar to or less than Alternatives C or E, depending on the re-use. Water use and wastewater generation would be maintained within capacity of existing sources / systems.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and R RTP		B – Hot Springs CBOC and R RTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and R RTP, Rapid City MSOC	D – Hot Springs CBOC and R RTP, Rapid City MSOC and R RTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Wildlife and Habitat	<p>Minimal habitat disturbance possible, depending on locations. Site survey for protected species, consultation and mitigation with state and federal wildlife agencies if needed would minimize potential for construction impacts. Negligible operation-related impacts to terrestrial or aquatic ecosystems.</p> <p>A-2: Potential for construction impacts similar to but less than Alternative A-1 due to decreased construction footprint.</p>		<p>Minimal habitat disturbance possible, depending on locations. Potential for construction impacts similar to but slightly higher than Alternative A due to slightly increased construction footprint. Negligible operation-related impacts to terrestrial or aquatic ecosystems.</p>	<p>Minimal habitat disturbance possible, depending on location for Rapid City MSOC. Potential for construction impacts similar to but less than Alternative A due to decreased construction footprint. Negligible operation-related impacts to terrestrial or aquatic ecosystems.</p>	<p>Minimal habitat disturbance possible, depending on locations. Potential for construction impacts similar to but higher than Alternative A due to increased construction footprint. Negligible operation-related impacts to terrestrial or aquatic ecosystems.</p>	<p>No construction or renovation in undeveloped areas; thus, no construction impacts. Negligible operation-related impacts to terrestrial or aquatic ecosystems.</p> <p>Minimal habitat disturbance possible, depending on locations (assuming MSOC would also be constructed in Rapid City.</p>	<p>No construction or renovation in undeveloped areas; thus, no construction impacts. Negligible operation-related impacts to terrestrial or aquatic ecosystems.</p>	<p>No construction or renovation in undeveloped areas; thus, no construction impacts. Negligible operation-related impacts to terrestrial or aquatic ecosystems.</p>

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Noise	Construction-related noise and vibration impacts would be short-term and potentially moderate in magnitude, depending on the locations in Hot Springs and Rapid City; daytime scheduling of construction activities and shielding would reduce impacts. Operation-related noise would be minor.		Similar to Alternative A, also depending on locations.	Similar to Alternative A, also depending on locations.	Similar to Alternative A, also depending on locations.	Construction and renovation-related noise and vibration impacts would be short-term and potentially moderate in magnitude for receptors on or near the Hot Springs Campus; daytime scheduling of construction activities and shielding would reduce impacts. Operation-related noise would be minor.	Renovation-related noise and vibration impacts would be short-term and potentially moderate in magnitude for receptors on or near the Hot Springs Campus; daytime scheduling of construction activities and shielding would reduce impacts. Operation-related noise would be minor.	Similar to Alternative E.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Land Use	Temporary disturbances to adjacent land uses and users during construction. Sites selected for VA facilities would be generally compatible with and not substantially conflict with current or planned future land uses and zoning designations. A-2: No impact to land use on VA Hot Springs campus or in City of Hot Springs			No impact to land use on VA Hot Springs Campus or in City of Hot Springs. Impact to land use in Rapid City similar to Alternative B.	Similar to Alternative B.	No impact to land use on VA Hot Springs Campus or in City of Hot Springs. Impact to land use in Rapid City similar to Alternative B.	Similar to Alternative C, except no impact in Rapid City.	Similar to Alternative C, except transfer to and re-use by non-federal proponent would be subject to Hot Springs land use planning and zoning. No impact in Rapid City.
Floodplains and Wetlands	No construction would occur within 100-year floodplains. If not feasible to avoid wetlands in site selection, VA would comply with federal and state coordination and permit requirements and, as needed, compensate for lost function and value.			Similar to Alternative A for location of Rapid City MSOC. No impacts in Hot Springs.	Similar to Alternative A.	No impacts.	No impacts.	No impacts.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Socioeconomics	<p><u>Hot Springs:</u> Beneficial but negligible impact to employment and housing during construction. Adverse minor to moderate impact to housing and employment, adverse major impact to wages from operation.</p> <p><u>Rapid City:</u> Beneficial negligible impact to employment and housing during construction using local contractor. Beneficial but negligible impact to housing, employment, and wages from operation.</p> <p><u>Other Counties:</u> Adverse negligible impact.</p>	<p><u>Hot Springs:</u> Similar to Alternative A, except more beneficial because larger construction workforce, and slightly less adverse minor to moderate impact to employment, housing, and wages from operation.</p> <p><u>Rapid City:</u> Similar to Alternative A during construction but less. No measurable impact from operation.</p> <p><u>Other Counties:</u> Similar to Alternative A</p>	<p><u>Hot Springs:</u> Similar to Alternative B during construction; same as Alternative B from operation.</p> <p><u>Rapid City:</u> Similar to Alternative B during construction; same as Alternative B from operation.</p> <p><u>Other Counties:</u> Same as Alternative B.</p>	<p><u>Hot Springs:</u> Similar to Alternative B but slightly less during construction; similar to Alternative A from operation but slightly less.</p> <p><u>Rapid City:</u> Similar to Alternative A but slightly less during construction and from operation.</p> <p><u>Other Counties:</u> Similar to Alternative A but slightly less.</p>	<p><u>Hot Springs:</u> Minor to major beneficial impact to employment and housing during construction. Major beneficial impact to wages and major increase in employment with potential adverse effects from operation if not enough employable persons to fill available jobs.</p> <p><u>Rapid City:</u> Negligible to minor beneficial impact to housing, wages.</p> <p><u>Other Counties:</u> Negligible beneficial impact.</p>	<p><u>Hot Springs:</u> Moderate beneficial impact to housing during construction; negligible impact from operation.</p> <p><u>Rapid City:</u> None.</p> <p><u>Other Counties:</u> None.</p>	<p><u>Hot Springs:</u> Similar to Alternative C or E.</p> <p><u>Rapid City:</u> None.</p> <p><u>Other Counties:</u> None.</p>	
Attachment to Record of Decision – Reconfiguration of VA Black Hills Health Care System EIS/Integrated Section 106								
A - 9								

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Community Services	<p>Negligible construction-related impact on local clinics / hospitals; fire, police, and emergency response; school districts; and parks / recreational facilities.</p> <p>No increase in demand for fire, police, and emergency response in Hot Springs or Rapid City from operation.</p> <p>Moderate decrease in school enrollment in Hot Springs and minor to moderate decrease in revenue support in Hot Springs; negligible change in Rapid City.</p>		Similar to Alternative A but slightly less for Hot Springs.	Construction-related impact similar to Alternative A but slightly less for Rapid City. Same as Alternative B from operation.	Similar to Alternative A but slightly less for Hot Springs and Rapid City.	Constructed-related impact similar to Alternative C, except impact to schools similar to Alternative A. Moderate additional demand on fire, police, and emergency services; moderate to major increase in school enrollment, beneficial impact to funding community services in Hot Springs from operation. Negligible change in Rapid City.	Negligible construction-related impact to Hot Springs community services; no impact to Rapid City. No operation-related impact.	Similar to Alternatives C or E.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Solid Waste and Hazardous Materials	Construction-related solid waste generation would have a negligible effect on remaining landfill capacities. Solid, medical, and hazardous waste generation rates (increased in Rapid City, decreased in Hot Springs) would have a negligible impact on treatment and disposal facilities.		Similar to Alternative A, except that operational rates of solid, medical, and hazardous waste generation would increase less in Rapid City, and decrease less in Hot Springs.	Similar to Alternative B, except that special wastes (asbestos-containing materials, lead-based paint) could also be generated.	Similar to Alternative A, except that operational rates of solid, medical, and hazardous waste generation would increase slightly less in Rapid City, and only slightly decrease in Hot Springs.	Construction- and renovation-related waste generation could include special wastes (asbestos-containing materials, lead-based paint); there would be a negligible effect on remaining landfill capacities. Solid, medical, and hazardous waste generation rates (increased in HS, unchanged in RC) would have a negligible impact on treatment and disposal facilities.	Renovation-related waste generation could include special wastes (asbestos-containing materials, lead-based paint); would have a negligible effect on remaining landfill capacities. Solid, medical, and hazardous waste generation rates would not change and would have a negligible impact on treatment and disposal facilities.	Similar to Alternatives E and F.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Transportation and Traffic	Temporary disruption to road networks and traffic circulation during construction. Vehicle trips decrease in Hot Springs; potential adverse impact on traffic congestion in Rapid City with operation. Potential increase in demand for public transportation.		Similar to Alternative A except impact more extensive for Hot Springs.	Similar to Alternative A but less extensive.	Similar to Alternative A but more extensive for Hot Springs and less extensive for Rapid City.	Similar to Alternative A but more extensive for Hot Springs. No impact for Rapid City.	Similar to Alternative C but less extensive. No impact for Rapid City.	Similar to Alternatives C or E. No impact for Rapid City.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Utilities	Projected utility requirements are within the capacity of existing systems. Energy efficiency and water conservation improvements compared to existing facilities could be incorporated. If the Hot Springs VA Campus is not in use, there could be a concern for proper functioning of the Hot Springs wastewater treatment plant, but the threshold for this issue is not known. Known. A significant reduction in flow could result in adverse impacts to Hot Springs wastewater treatment plant.		Projected utility requirements are within the capacity of existing systems. Renovations could include modifications to improve energy efficiency and water conservation at Hot Springs VA Campus. Decreased wastewater flow to the Hot Springs wastewater treatment plant could occur, but the threshold effects to the plant's function is not known.	Similar to Alternative A.	Utility requirements in Rapid City would remain the same. Requirements in Hot Springs would increase but remain within the capacity of the existing systems. Renovations could include modifications to improve energy efficiency and water conservation at Hot Springs VA Campus.	Utility requirements would remain the same, and continue to be within the capacity of existing systems. Renovations could include modifications to improve energy efficiency and water conservation at Hot Springs VA Campus.	Similar to Alternatives C, E, or F, depending on the type of re-use.	

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Environmental Justice	No disproportionate health or environmental effects to environmental justice communities. Improved geographic access to care except for proximity to RRTP services for Veterans closer to Hot Springs than Rapid City.		No disproportionate health or environmental effects to environmental justice communities. Improved geographic access to care except for proximity to RRTP services for Veterans closer to Rapid City than Hot Springs.	No disproportionate health or environmental effects to environmental justice communities. Improved geographic access to care except for proximity to RRTP services for Veterans closer to Rapid City than Hot Springs.	No disproportionate health or environmental effects to environmental justice communities. Improved geographic access to care.	No disproportionate health or environmental effects to environmental justice communities. Similar impacts related to geographic access to care as Alternative F.	No disproportionate health or environmental effects to environmental justice communities. Would continue to not meet VA guideline for acceptable geographic access to care (driving time to obtain care) in service area.	No health or environmental effects to environmental justice communities expected.

Table 1: Summary of Impact Analysis

Resource / Issue	A – Hot Springs CBOC, Rapid City MSOC and RRTP		B – Hot Springs CBOC and RRTP, Rapid City MSOC	C – Hot Springs Existing Campus CBOC and RRTP, Rapid City MSOC	D – Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP	E – Save the VA Proposal	F – No Action	Supplemental G – Re-use of Hot Springs Campus
	A-1 new CBOC in Hot Springs	A-2 CBOC Hot Springs Existing Campus						
Cumulative Impacts	<p>No significant cumulative impacts identified in Hot Springs or Rapid City for any resource area under any alternative except for socioeconomics as noted below. Potential cumulative impacts to historic resources are also a concern but would be addressed through mitigation measures.</p> <p>Socioeconomics: Given the past economic decline in Hot Springs and Fall River County region, resulting from a number of different circumstances, the proposed reduction in employment and wages could have potentially significant impact to the Fall River County and local Hot Springs community under Alternatives A-1, A-2, B, C and D. However, the recently proposed national VHA Pharmacy call center, which would be located in Buildings 3 and 4 on the existing Hot Springs Campus, would bring in 120 new jobs that would help offset the employment losses under Alternatives A-1 through D. Cumulative impacts under Alternative E would result in an overall beneficial impact on the economy.</p> <p>Cultural Resources: There could be a cumulative direct effect to the Hot Springs Historic District if exterior renovations, new construction, and aesthetic changes on the VA Hot Springs Campus, together with other ongoing and planned construction in Hot Springs, contrast with the historic setting, feeling, and association of the Hot Springs Historic District. Measures to resolve adverse effects would be designed and implemented to avoid or minimize effects. No anticipated change in status of NHL listing.</p> <p>Regarding campus reuse (Alternatives A-1, A-2, B, C and D with Alternative G, the marketing strategy included in the measures to resolve adverse effects takes into account potential for shared campus. Campus redevelopment would be subject to restrictions of the measures to resolve adverse effects to Bartle Mountain Sanitarium and the Hot Springs Historic District.</p>							

-----End, Table: Summary of Impact Analysis-----