Draft Environmental Impact Statement and *National Historic Preservation Act* Section 106 Consultation:

Reconfiguration of VA Black Hills Health Care System

U.S. Department of Veterans Affairs

Black Hills Health Care System

October 2015

What is NEPA and How Does it Apply to Federal Actions?

- Under the *National Environmental Policy Act* (NEPA), federal agencies must comply with the procedural requirements of NEPA before they make final decisions about major federal actions that could have effects on the human environment. For purposes of NEPA, "effects" and "impacts" mean the same thing. They include ecological, aesthetic, historic, cultural, economic, social, or health impacts, whether adverse or beneficial and whether direct, indirect, or cumulative. "Human environment" includes the natural and physical environment and the relationship of people with that environment.
- NEPA's procedural requirements pertain to a federal agency's projects, programs, plans, policies, and proposals. NEPA applies when a federal agency has discretion to choose among one or more alternative means of accomplishing a particular goal.
- NEPA requires federal agencies to consider environmental effects in their decision making. It does not require the decision maker to select the environmentally preferable alternative or prohibit adverse environmental effects. Decision makers in federal agencies often have other concerns and policy considerations to take into account in the decision-making process, such as social, economic, health, or national security interests. However, NEPA does require that decision makers be informed of the environmental consequences of their decisions.
- A federal agency must prepare an environmental impact statement (EIS) if it is proposing a "major federal action significantly affecting the quality of the human environment".
- One key aspect of an EIS is the statement of the underlying purpose (objectives) and need (reasons) for the proposed action. Agencies draft a "Purpose and Need" statement to describe what they are trying to achieve by proposing an action. The purpose and need statement explains to the reader why an agency action is necessary, and serves as the basis for identifying a reasonable range of alternatives that meet the purpose and need.
- The identification and evaluation of alternative ways of meeting the purpose and need of the proposed action is the heart of the NEPA analysis. The agency objectively evaluates all reasonable alternatives, and for alternatives that were eliminated from detailed study, briefly discusses the reasons for their having been eliminated.
- Reasonable alternatives include those that are practical or feasible from a technical and economic standpoint and using common sense, rather than simply desirable. Agencies must evaluate all reasonable alternatives in enough detail so that a reader can compare and contrast the environmental effects of the various alternatives.
- The record of decision is the final step in the EIS process. This document states what the decision is; identifies the alternatives considered, including the environmentally preferable alternative; and discusses mitigation plans, including any enforcement and monitoring commitments.

From *A Citizen's Guide to the NEPA*, Council on Environmental Quality, 2007.

ABSTRACT

LEAD AGENCY: U.S. Department of Veterans Affairs (VA), Black Hills Health Care System (BHHCS)

COOPERATING AGENCIES: None

TITLE OF PROPOSAL: Reconfiguration of VA Black Hills Health Care System

AFFECTED JURISDICTION: Western South Dakota, northwestern Nebraska, eastern Wyoming

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PROPONENT: VA BHHCS

DOCUMENT DESIGNATION: Draft Environmental Impact Statement (EIS) and *National Historic Preservation Act* Section 106 Consultation

VA proposes to reconfigure health care services throughout the VA BHHCS catchment area, including the addition of purchased care for Veterans from community providers (3 tertiary care facilities and 26 secondary care facilities), which would improve VA BHHCS's compliance with VA's "Geographic Access to Care" guidelines. This EIS analyzes the potential impacts of six alternatives for changes to VA's facilities in Hot Springs and Rapid City, South Dakota, to support the proposed services reconfiguration.

Alternatives A through D involve the addition of purchased care from community providers and varying combinations of new construction or leases in Hot Springs and Rapid City, and renovations to or vacating the Hot Springs VA campus. Alternative E is a proposal developed by Save the VA, a local community organization, for expanded VA health care services at the Hot Springs campus. Alternative F is the No Action alternative, which is required by the *National Environmental Policy Act* (NEPA) and its regulations and also provides a baseline for comparing potential impacts from the action alternatives. Supplemental Alternative G, repurposing all or part of the existing Hot Springs campus, could be implemented in concert with Alternatives A through D.

VA BHHCS's preferred alternative is Alternative A, which would add purchased care from community providers, construct a multi-specialty outpatient clinic and 100-bed residential rehabilitation treatment program facility in Rapid City, construct a community-based outpatient clinic in Hot Springs, discontinue services at the Hot Springs campus—which includes the Battle Mountain Sanitarium, a National Historic Landmark—and identify and approve appropriate re-use of the Hot Springs campus under Supplemental Alternative G.

The analysis uses the substitution procedures defined in the regulations for implementing Section 106 of the *National Historic Preservation Act*, by which agencies can substitute the NEPA process for effects analysis and consultation under Section 106, by developing an integrated NEPA analysis. Consultation and identification and resolution of effects to historic properties are documented throughout this EIS.

The EIS describes mitigation measures for the potential impacts to environmental resources that are identified in the analysis. Unavoidable adverse impacts include effects to air quality, cultural resources and historic properties, noise, socioeconomics, solid waste and hazardous materials, utilities, and transportation and traffic. With the exception of socioeconomics, mitigation measures would substantially decrease the magnitude of these impacts.

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ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
ADT	average daily traffic
APE	area of potential effects
AST	aboveground storage tank
BHHCS	Black Hills Health Care System
Btu	British thermal unit
CBOC	community-based outpatient clinic
CEQ	Council on Environmental Quality
CERCLA	*Comprehensive Environmental Response, Compensation, and Liability Act*
CESQG	conditionally exempt small-quantity generator
CFM	VA's Office of Construction & Facilities Management
CFR	Code of Federal Regulations
CLC	community living center
CRGRID	Cultural Resource Geographic Research Information Display
CT	computerized tomography
CWT	compensated work therapy
DAV	Disabled American Veterans (organization)
dB	decibel
dBA	A-weighted decibel
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
EUL	enhanced-use lease
FD	fire department
FEMA	Federal Emergency Management Agency
FIRM	flood insurance rate map
ft	foot, feet
ft^2	square feet
ft^3	cubic feet
FTEE	full-time equivalent employee
FWS	U.S. Fish and Wildlife Service
FY	fiscal year
gpd	gallons per day
GSF	gross square feet
HAP	hazardous air pollutant
IHS	Indian Health Service

L_{10}, L_{50}, L_{90}	sound level at 10th, 50th, 90th percentile
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent sound level
L_{max}, L_{min}	maximum or minimum sound level
MPO	Rapid City Area Metropolitan Planning Organization
MRI	magnetic resonance imaging
MSOC	multi-specialty outpatient clinic
NAAQS	National Ambient Air Quality Standards
NE	Nebraska
NEPA	*National Environmental Policy Act*
NHDVS	National Homes for Disabled Volunteer Soldiers
NHL	national historic landmark
NHPA	*National Historic Preservation Act*
NOA	notice of availability
NOI	notice of intent
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
NSR	new source review
NWI	National Wetlands Inventory
PCBs	polychlorinated biphenyls
PD	police department
PM	particulate matter
PM_{10}	particulate matter less than 10 micrometers in diameter
PTSD	post-traumatic stress disorder
RCRA	*Resource Conservation and Recovery Act*
ROD	record of decision
RRTP	residential rehabilitation treatment program
SD	South Dakota
SDCL	South Dakota Codified Laws
SDDENR	South Dakota Department of Environment and Natural Resources
SDDFG	South Dakota Department of Fish and Game
SHPO	State Historic Preservation Officer
SSPP	strategic sustainability performance plans
U.S.	United States
U.S.C.	United States Code
USACE	U.S. Army Corps of Engineers

UST	underground storage tank
VA	U.S. Department of Veterans Affairs
VAMC	VA Medical Center
VFD	volunteer fire department
VHA	Veterans Health Administration
VISN	Veterans Integrated Service Network
WY	Wyoming

EXECUTIVE SUMMARY

As required by the *National Environmental Policy Act* (NEPA), the U.S. Department of Veterans Affairs (VA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the proposed reconfiguration of health care services within the Black Hills Health Care System (BHHCS) in this environmental impact statement (EIS). VA BHHCS provides health care to approximately 19,000 Veterans over 100,000 square miles in western South Dakota, northwestern Nebraska, and eastern Wyoming.

This EIS integrates NEPA review of the proposal with requirements for consultation on effects to historic properties under Section 106 of the *National Historic Preservation Act*. This integrated process complies with the Advisory Council on Historic Preservation's "Procedures for the Protection of Historic Properties" as well as published federal guidance for substituting the NEPA process for Section 106 review.

The ***purpose*** of VA's proposal to reconfigure health care services in the 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 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 that VA offers to Veterans in the catchment area.

Decisions regarding appropriate physical buildings and infrastructure required to provide the proposed reconfiguration of services are the focus of this EIS and the NEPA process. **It is not within the scope of this 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 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." **This EIS analyzes impacts from the alternatives for the physical facilities from which health care services are offered within the VA BHHCS catchment area.**

Six alternatives are considered in detail in this EIS, as well as a supplement to four of the alternatives. The alternatives propose 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:

A. Hot Springs: new CBOC, cease services at 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: renovations for new CBOC in 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 200-bed RRTP
   Rapid City: services from existing leased CBOC

F. No Action

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

Alternative A is VA's preferred alternative.

The following table summarizes the potential environmental impacts of the alternatives.

Table: 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
Meets purpose of and need for action	Yes	Yes	No	Yes	No	No	Not applicable
Estimated 30-year cost	$148,622,461	$168,234,767	$229,838,861	$176,040,980	$247,036,697	$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.

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
Air Quality	Construction and operation emissions would comply with all permit requirements and regulations, ensuring negligible impacts. Particulate emissions during construction would be below the *de minimis* threshold level. Decreased mobile source emissions due to improved geographic access to care.	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 results 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. Operations 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.

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
Cultural Resources and Historic Properties	On-campus: Change in use of VA Hot Springs campus would diminish historic character of National Historic Landmark and affect setting of Historic District, traditional use area. Actions to maintain or mothball campus buildings could alter historic features. Off-campus: Ground disturbance could encounter and remove archaeological and cultural materials. Construction introduces audible and visual elements to historic setting.		On-campus: 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. Off-campus: Similar to Alternative A, except affects only Rapid City.	On-campus: Similar to Alternative A. Off-campus: similar to Alternative A.	On-campus: Exterior and interior renovations, new construction could alter historic features. Ground disturbance could encounter and remove archaeological and cultural materials. Construction introduces audible and visual elements to historic setting. Off-campus: None.	On-campus: Actions to maintain or upgrade campus buildings could alter historic features. Off campus: None.	On-campus: Similar to Alternative E. Change in use of campus would diminish historic character of National Historic Landmark. Off-campus: None/Not applicable.

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
Geology and Soils	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.	Potential for construction impacts similar to but slightly higher than Alternative A due to slightly increased total ground area disturbed for new construction.	Potential for construction impacts similar to but less than Alternative A due to decreased total ground area disturbed for new construction.	Potential for construction impacts similar to but higher than Alternative A due to increased total ground area disturbed for new construction.	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.	Potential for construction impacts similar to or less than Alternative C; would occur only in the case of exterior modifications requiring ground disturbance.	Construction impacts similar to or less than Alternative E, depending on the extent of renovation or construction.

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
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.	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.

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
Wildlife and Habitat	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.	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.	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.	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.	No construction or renovation in undeveloped areas; thus, no construction impacts. Negligible operation-related impacts to terrestrial or aquatic ecosystems.	No construction or renovation in undeveloped areas; thus, no construction impacts. Negligible operation-related impacts to terrestrial or aquatic ecosystems.	No construction or renovation in undeveloped areas; thus, no construction impacts. Negligible operation-related impacts to terrestrial or aquatic ecosystems.

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
Noise	Construction-related noise and vibration impacts would be short-term and potentially moderate in magnitude, depending on the locations; daytime scheduling of construction activities and shielding would reduce impacts. Operation-related noise would be minor.	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, and depending on location of Rapid City MSOC; daytime scheduling of construction activities and shielding would reduce impacts. Operation-related noise would be minor.	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.

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
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.		No impact to land use on VA Hot Springs campus or in City of Hot Springs. Impact to land us use in Rapid City similar to Alternative B.	Similar to Alternative B.	Similar to Alternative C, except no impact in Rapid City.	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.

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
Socioeconomics	Hot Springs: Beneficial negligible impact to employment and housing during construction. Adverse minor to moderate impact to housing and employment, adverse moderate to major impact to wages from operation. Rapid City: Beneficial negligible impact to employment and housing during construction using local contractor. Beneficial but negligible impact to housing, employment, and wages from operation. Other Counties: Adverse negligible impact.	Hot Springs: Similar to Alternative A, except minor to moderate beneficial impact to employment and housing during construction, and slightly less adverse minor to moderate impact to employment, housing, and wages from operation. Rapid City: Similar to Alternative A during construction but less. No measurable impact from operation. Other Counties: Similar to Alternative A.	Hot Springs: Similar to Alternative B during construction; same as Alternative B from operation. Rapid City: Similar to Alternative B during construction; same as Alternative B from operation. Other Counties: Same as Alternative B.	Hot Springs: Similar to Alternative B but slightly less during construction; similar to Alternative A from operation but slightly less. Rapid City: Similar to Alternative A but slightly less during construction and from operation. Other Counties: Similar to Alternative A but slightly less.	Hot Springs: 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. Rapid City: Negligible to minor beneficial impact to housing, wages. Other Counties: Negligible beneficial impact.	Hot Springs: Moderate beneficial impact to housing during construction; negligible impact from operation. Rapid City: None. Other Counties: None.	Hot Springs: Similar to Alternative C or E. Rapid City: None. Other Counties: None.

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
Community Services	Negligible construction-related impact on local clinics / hospitals; fire, police, and emergency response; school districts; and parks / recreational facilities. No increase in demand for fire, police, and emergency response in Hot Springs or Rapid City from operation. Minor decrease in school enrollment and minor to moderate decrease in revenue support in Hot Springs; negligible change in Rapid City.	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.

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
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 Hot Springs, unchanged in Rapid City) 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.

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
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.

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
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.		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.

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
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 dis-proportionate 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 dis-proportionate 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 dis-proportionate health or environmental effects to environmental justice communities. Improved geographic access to care.	No dis-proportionate health or environmental effects to environmental justice communities. Similar impacts related to geographic access to care as Alternative F.	No dis-proportionate 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.

Cumulative impacts from the incremental impact of the alternatives when added to other past, present, or reasonably foreseeable actions in the BHHCS service area are expected to be absent, negligible or minor for aesthetics, air quality, geology and soils, hydrology and water quality, wildlife and habitat, noise, floodplains and wetlands, solid waste and hazardous materials, utilities, and environmental justice. Any impacts to these resources would be similar to current VA health care services operations or to other new private and commercial developments that may occur within Hot Springs and Rapid City, and would include mitigation measures to minimize impacts. There are potential cumulative effects related to cultural resources, land use, socioeconomic conditions, and transportation and traffic, depending in most cases on the location(s) selected for new facilities. Mitigation measures, discussed in the EIS, would be applied to reduce any such impacts. In particular, effects to historic properties would be resolved by measures developed in consultation with the consulting parties for the integrated Section 106 process.

VA published a Notice of Availability (NOA) of this Draft EIS in the Federal Register, inviting public comments on the content of the document. VA BHHCS announced a 60-day comment period that officially started when the NOA for the Draft EIS was published by the Environmental Protection Agency in the Federal Register. VA BHHCS will host public comment meetings in six communities within the service area during the 60-day comment period. Responses to comments received during the comment period will be addressed in the Final EIS. After a 30-day review period for the Final EIS, VA will publish a record of decision that states the alternative selected for implementation and identifies associated mitigation commitments.

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1.0 INTRODUCTION, INCLUDING PURPOSE AND NEED

The United States (U.S.) Department of Veterans Affairs Black Hills Health Care System (VA BHHCS) announced in December 2011 their determination of a need to reconfigure VA BHHCS to enhance and maintain the quality and safety of care for Veterans in the 100,000-square mile service area, referred to as the "catchment area." In this environmental impact statement (EIS), VA identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the proposed reconfiguration of VA BHHCS.

This EIS is 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, must evaluate the potential environmental impacts of the agency's major actions significantly affecting the quality of the human environment.

This EIS substitutes NEPA review for the Section 106 process, which requires consultation on effects to historic properties under Section 106 of the *National Historic Preservation Act* (NHPA) (16 U.S.C. 470f). 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 complies 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).

The potential environmental impacts of six alternatives for carrying out the proposed reconfiguration are analyzed in this EIS. Alternatives A through D incorporate varying combinations of new construction or leases, and use of existing facilities. Alternative E is a proposal developed by Save the VA, a local community organization. Alternative F is the No Action alternative, which is required by NEPA and its regulations and also provides a baseline for comparing potential impacts from the action alternatives. Supplemental Alternative G, repurposing all or part of the existing Hot Springs facility, is a supplemental alternative that could be implemented in concert with Alternatives A through D.

1.1 Black Hills Health Care System

VA BHHCS is one of eight regional health care systems that comprise Veterans Integrated Service Network (VISN) 23 (also called the Midwest Health Care Network), one of 21 geographically defined networks within VA's Veterans Health Administration (VHA). VA BHHCS provides health care to approximately 19,000 Veterans over 100,000 square miles in western South Dakota (SD), northwestern Nebraska (NE), and eastern Wyoming (WY) (see Figure 1-1).

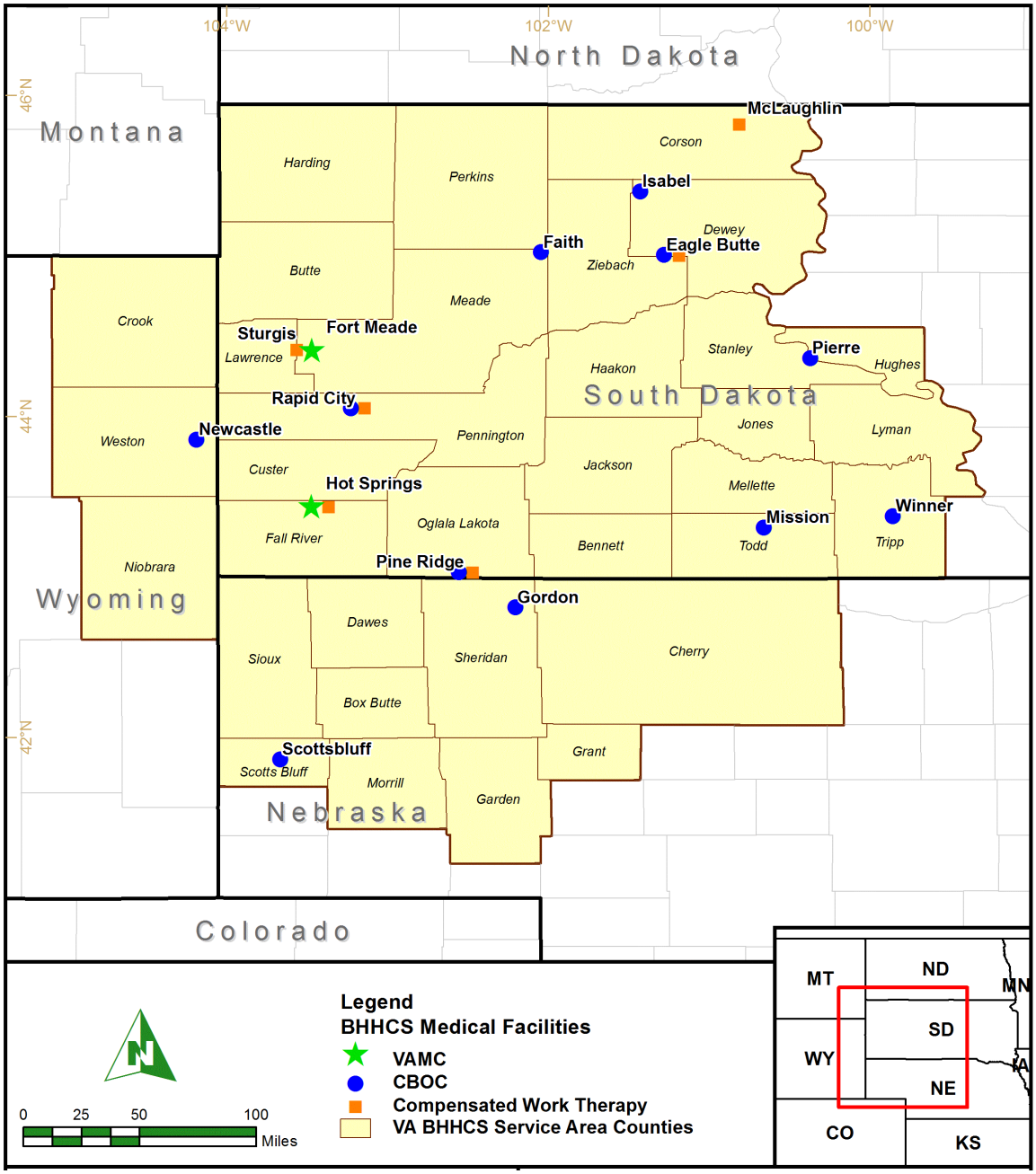


Figure 1-1. VA Black Hills Health Care System

1.1.1 Services and Partnerships

VA BHHCS provides the following services to Veterans at a network of facilities owned, leased, or where services are contracted by VA BHHCS:

- Compensated work therapy (CWT)
- Dialysis
- Home-based primary care
- Inpatient medical care (also referred to as "acute care")
- Laboratory
- Long-term care (nursing home)
- Mental health
- Mobile imaging, such as magnetic resonance imaging and computed tomography scans
- Call center
- Pharmacy services
- Physical therapy
- Primary care
- Residential rehabilitation treatment program (RRTP)
- Specialty care
- Surgical services
- Urgent care
- X-ray
- Emergency care
- Rehabilitation medicine

In addition, VA BHHCS has service agreements with other federal, state, and private entities:

- Provides radiology services to non-Veteran Native Americans in cooperation with Pine Ridge and Sioux San Indian Health Service (IHS) facilities.
- Reimburses IHS for authorized care received by Native American Veterans at IHS facilities.
- A mutual aid agreement with Ellsworth Air Force Base for sleep study services, radiology services, mobile imaging, and some mental health services.
- Memorandum of understanding with South Dakota Army National Guard at Fort Meade to provide urgent care for officer candidate school students.
- Provide onsite social work, nutrition, and behavioral health care to eligible Veterans residing in the Michael J. Fitzmaurice State Veterans Home in Hot Springs.
- Provide dialysis at the Hot Springs facility for Medicare recipients, and bill Medicare for reimbursement (a VA/Medicare partnership unique to Hot Springs).
- Coordinate care of Veterans by a non-VA provider, which is called *purchased care*, *non-VA care*, or *fee care*. VA provides a referral, schedules an appointment in coordination with the Veteran, pays the fee, and manages the patient as needed based on outcome. Patients can often manage themselves for multiple purchased care appointments for services such as physical therapy.

1.1.2 Facilities

VA BHHCS consists of two medical centers, 11 community-based outpatient clinics (CBOCs), and six CWT locations. Table 1-1 summarizes the BHHCS facilities.

Table 1-1. Existing VA BHHCS Medical Facilities.

Medical Centers	Compensated Work Therapy
Fort Meade, SD – hospital and outpatient services Hot Springs, SD – hospital, outpatient services, and RRTP	Transitional residence care units (VA staffed): Hot Springs, SD – at VA Hot Springs campus Pine Ridge, SD – co-located with Pine Ridge CBOC Rapid City, SD VA-owned, separate building from CBOC Sturgis, SD – VA- owned building Therapy program offices (VA staffed): Eagle Butte, SD – leased facility, separate building from CBOC Pine Ridge, SD – co-located with Pine Ridge CBOC McLaughlin, SD (also provides mental health outreach) – leased facility
Community-Based Outpatient Clinics	
VA-owned and staffed: Pine Ridge, SD VA-staffed leased facility: Rapid City, SD Newcastle, WY Contracted: Eagle Butte, SD Faith, SD Isabel, SD Mission, SD Pierre, SD Winner, SD Gordon, NE Scottsbluff, NE	

1.1.2.1 Fort Meade VA Medical Center

The Fort Meade VA Medical Center (VAMC) is located at 113 Comanche Road in Fort Meade, SD. The VAMC offers primary care, emergency medical care, pharmacy services, inpatient (18 medical/surgical and 10 mental health staffed beds) and outpatient specialty and surgical care, intensive care unit (4 staffed beds), operating room, laboratory services, x-ray and mobile imaging, physical therapy, and mental health services. Fort Meade VAMC also has 57 staffed beds for long-term care in a Community Living Center (nursing home).

The VA BHHCS reconfiguration proposal does not include any changes to the facilities at the Fort Meade VAMC; thus, it is not described or evaluated further in this EIS.

1.1.2.2 Hot Springs VA Medical Center

The Hot Springs VAMC campus occupies 71.7 acres at 500 North 5th Street in Hot Springs, SD. It opened its doors in 1907 as the Battle Mountain Sanitarium National Home for Disabled Volunteer Soldiers, and was listed as a National Historic Landmark in 2011. Section 3.3 of this EIS provides a detailed description of the historic significance of the Hot Springs campus.

Aerial view of Battle Mountain Sanitarium, Hot Springs.

The VAMC provides primary care, urgent care, pharmacy services, outpatient procedures, inpatient medical care (10 beds), dialysis, x-ray and mobile imaging, specialty care, laboratory services, mental health services, and a call center. The medical center also includes 7 beds (co-located with the 10-bed medical unit) for long-term care in a Community Living Center (nursing home) and 100 RRTP beds. The RRTP serves homeless Veterans and provides mental health services for post-traumatic stress disorder, substance abuse, alcohol abuse, and other conditions.

1.1.2.3 Community-Based Outpatient Clinics

The 11 CBOCs in the BHHCS provide mainly primary care service, as summarized in Table 1-2.

Table 1-2. BHHCS Community-Based Outpatient Clinics.

Location	Hours	Services [1]	Facility and Staffing
3625 5th Street **Rapid City, SD** 57701	Monday – Friday 7:00 a.m. – 4:30 p.m.	Primary care, specialty care, and mental health	Leased facility. Staffed and equipped by VA.
8000 Highway 212 **Eagle Butte, SD** 57625	Monday – Friday 8:00 a.m. – 3:30 p.m.	Primary care	Contract clinic operated by Prairie Community Health
112 N. 2nd Ave. W. **Faith, SD** 57626	Monday – Friday 8:00 a.m. – 3:30 p.m.	Primary care	Contract clinic operated by Prairie Community Health
118 N. Main St. **Isabel, SD** 57633	Monday – Friday 8:00 a.m. – 3:30 p.m.	Primary care	Contract clinic operated by Prairie Community Health
153 Main Street **Mission, SD** 57555	Monday – Friday 7:30 a.m. – 5:00 p.m.	Primary care	Contract clinic operated by Horizon Health Care Inc.
1601 North Harrison Suite 6 **Pierre, SD** 57501	Monday – Friday 8:00 a.m. – 5:00 p.m.	Primary care	Contract clinic operated by Linn Medical Clinic

Table 1-2. BHHCS Community-Based Outpatient Clinics (continued).

Location	Hours	Services [1]	Facility and Staffing
Next to Dialysis Building, across from IHS Hospital **Pine Ridge, SD** 57770	2nd and 4th Mondays 8:00 a.m. - 3:30 p.m.	Primary care and CWT	VA-owned facility. Staffed by VA.
1436 East 10th Street **Winner, SD** 57580	Monday – Friday 8:00 a.m. – 5:00 p.m.	Primary care	Contract clinic operated by Avera Health.
300 East 8th Street **Gordon, NE** 69343	Monday – Friday 8:00 a.m. – 5:00 p.m.	Primary care	Contract clinic operated by Gordon Memorial Hospital.
1720 E Portal Place **Scottsbluff, NE** 69361	Monday – Friday 7:00 a.m. – 4:30 p.m.	Primary care	Contract clinic operated by STGI.
1124 Washington Blvd. **Newcastle, WY** 57555	1st and 3rd Mondays 8:30 a.m. - 2:30 p.m.	Primary care	Leased space. Staffed by VA.

[1] The facility provides services that fall within the listed category, but does not necessarily provide the entire range of services in that category.

1.1.2.4 Compensated Work Therapy

CWT is a VA vocational rehabilitation program that matches and supports work-ready Veterans in competitive jobs in consultation with business and industry regarding their specific employment needs. VA BHHCS staff provide CWT services at leased facilities in Eagle Butte and McLaughlin, SD, and a VA-owned facility in Pine Ridge, SD. The health care system also has four CWT transitional residence care units, in Hot Springs, Pine Ridge, Rapid City, and Sturgis, SD.

1.1.3 Veteran Population in BHHCS Catchment Area

The 34 counties in the VA BHHCS catchment area were home to over 35,000 Veterans in fiscal year (FY) 2014. Approximately 60 percent of these Veterans were both eligible for and had enrolled to receive care at a VA facility. Eligibility for VA health care is determined by type of service in military, condition of separation from service, and length of duty. Once enrolled, a Veteran is assigned to one of eight priority groups. Availability of the congressionally allocated funds for Veterans health benefits is prioritized among these groups, considering factors such as service-connected disabilities, former prisoners of war, Purple Heart or Medal of Honor recipients, other aid received from VA, income, VA pension recipients, Medicaid eligibility, and certain specific service assignments, exposures, or conflicts (VA 2015a).

Numbers of Veterans residing in the catchment area, enrolled in VA health care, and receiving health care services provided by VA BHHCS vary with the time period covered if they are actual counts, or with the model and its baseline if they are projections. The sources and data for current and projected Veteran population and health care enrollees and service recipients are described in Section 1.2.2.2.

1.1.4 Employees

At the end of FY 2014, VA BHHCS employed 1,103 individuals, with 1,021 full-time and 82 part-time. The workforce represented a total of 1,069 full-time equivalent employees. The staff included 42 physicians, 271 nurses, and 29 physician assistants and nurse practitioners. Other employees included ancillary medical, housekeeping, administrative, and facilities management staff. There were also 301 volunteers that provided transportation; served in the Honor Guard; visited patients; and provided information desk, clerical, and other services.

1.2 Purpose of and Need for Reconfiguration of the BHHCS

The "purpose and need" element of an EIS explains why the action being proposed is needed, and serves as the basis for developing a reasonable range of alternatives. The purpose consists of the objectives of the proposed action that address an underlying condition or correct a problem. The need is the underlying condition or problem that leads the agency to propose the action.

1.2.1 Statement of Purpose and Need

The ***purpose*** of VA's proposal to reconfigure health care services in the 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 VISN 23'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 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 that VA offers to Veterans in the catchment area.

The factors that contribute to this determination of need are described in Section 1.2.2.

1.2.2 Factors Resulting in Need for Reconfiguration of BHHCS

The factors listed below, described more fully in the subsections that follow, contributed to the determination of need:

- The quality of care offered at the Hot Springs facility is constrained because VA has difficulties recruiting and retaining qualified staff to work at that location, and maintaining clinical competency of Hot Springs staff due to low patient volume.

- The Hot Springs VAMC campus needs significant renovation to maintain clinical standards and for continued facility sustainment. It does not comply with the *Architectural Barriers Act* and with VA accessibility requirements.
- The existing RRTP at Hot Springs limits care available to single parent Veterans or Veterans with families.
- The existing RRTP at Hot Springs does not meet the facility requirements for the VA's recovery model of care and has limited potential for enhancement to meet the requirements.
- Facility costs at the Hot Springs campus negatively affect VA's stewardship of funds appropriated for Veterans health care.
- Current and projected future Veteran population centers in the BHHCS catchment area are not in the same locations as existing VA facilities.
- Veterans currently face long distances, extended travel times, and travel costs to access primary and secondary care.

1.2.2.1 Factors Contributing to VA's Difficulty Maintaining High-Quality, Safe, and Accessible Care at the Hot Springs VAMC

1.2.2.1.1 Difficulty Recruiting and Retaining Qualified Staff, and Maintaining Clinical Competencies

VA BHHCS has difficulty recruiting and retaining qualified staff at the Hot Springs VAMC. This difficulty has been encountered for physicians, nurses, and some ancillary medical positions. The issues that contribute to this factor include:

- Low patient volume detracts from a licensed professional staff member's ability to attain and retain core competencies. In patient care, a reduced volume of procedures and decreasing familiarity with medications and treatment modalities increases the risk of error. In the Joint Commission's advice to the public *Helping You Choose: Quality Hospital Care*, the first question of 25 that are recommended is "Ask about the operation or treatment that you need. How often is it performed?" (Joint Commission 2013). Medical professionals may be expected to factor procedure volume into their decisions about where to practice, and providers will likewise consider this when evaluating what medical services to offer from a particular facility (see Section 1.2.2.2.1 discussion of "Critical Mass of Patients to Support a Service or Specialty").
- The federal government has difficulty in matching private sector salaries in addition to competing with a nationwide shortage of professional medical staff (see, for example, HRSA 2013). Some specialties are difficult to recruit in Hot Springs (orthopedics, laboratory technologists, sleep laboratory technicians, internal medicine, psychiatry, respiratory therapists, mental health professionals), even given the availability of the Education Debt Reduction Program, recruitment incentives, and enhanced salary rates.
- The rural location limits the appeal of relocating to Hot Springs. The U.S. Department of Labor's Bureau of Labor Statistics stated that "Job prospects should be good for physicians who are willing to practice in rural and low-income areas, because these areas tend to have

difficulty attracting physicians" (BLS 2015). VA offers recruitment/relocation incentives of up to 25 percent of basic pay, but recruitment for this location remains a challenge.

- Overall, affecting both public and private sector healthcare providers, Fall River County, SD, is designated as a "health professional shortage area" for all three categories reviewed: primary care, dental care, and mental health care (HHS 2015).

These recruiting and retention difficulties have resulted in high staff turnover, prolonged position vacancies, and more dependence on physicians who specifically seek positions for only a short period, usually a few weeks to a few months (referred to as "locum tenens" physicians).

The positions in and of themselves are not unattractive. The only part-time medical positions in Hot Springs for which VA BHHCS has tried to recruit are a surgeon and a certified registered nurse anesthetist, in both cases because full-time positions could not be supported by the workload.

The recruiting difficulties also affect and are affected by the limits on the designated level of medical services that VA can provide at the Hot Springs VAMC (basic-level ambulatory; see Section 1.2.2.2.1 discussion of "Critical Mass of Patients to Support a Service or Specialty").

1.2.2.1.2 Accessibility and Needed Renovations

Federal agencies must comply with the *Architectural Barriers Act* (42 U.S.C. 4151 et seq.) to ensure accessibility for handicapped individuals. (The *Americans with Disabilities Act* later extended similar protections to facilities of state and local governments and the private sector.) Specifically, federal agencies follow the regulations published as "*Architectural Barriers Act* Accessibility Guidelines" (36 CFR 1191 App. C). In addition, VA requires that its health care facilities follow the supplemental and more stringent "Barrier Free Design Guide" (VA 2011), which specifies greater accessibility related to the following:

- Ramp slope, length, clear width, and size of level landings where doors swing into landing.
- Handrail height.
- Elevator door width, car size. Double handrails required.
- Maximum window sill height in patient rooms.
- Minimum patient bedroom and toilet room entrance door width.
- Grab bar configurations in water closets and shower stalls.
- Minimum size for accessible and wheelchair front-transfer toilet stalls, and shower stalls.
- Grab bars required in all (not just accessible) toilet stalls.
- Higher knee clearance for a percent of cafeteria tables.
- Lower cutlery and supply height in cafeterias.
- 100 percent of patient bedrooms and toilet rooms are accessible (compared to 10 percent).

The facilities at Hot Springs were constructed as early as 1907. The 2015 Facility Condition Assessment of the Hot Springs VAMC (VA 2015b) identified 15 conditions specifically related to

accessibility, as listed in Table 1-3. The estimated total repair cost for only those conditions identified as accessibility deficiencies was estimated at $15,218,115. The assessment also listed many more repair and maintenance requirements at substantial additional costs to correct (see Chapter 2 for detailed information on estimated costs by alternative).

The 2015 Facility Condition Assessment for Hot Springs identified an additional $33,972,546 required to correct deficiencies in the architectural, electrical, mechanical, plumbing, steam generation/distribution, structural, transport, information technology, and hazardous materials (asbestos) systems of the campus buildings; and site work relating to parking lots, roads, and other items. The total cost to address all facility condition deficiencies was estimated to be $49,190,661 (VA 2015b).

Table 1-3. Accessibility Issues at Hot Springs VA Medical Center (2015).

Cost	Building Number	Building Name (current use)	Accessibility Issue
$62,325.00	10	Catholic Chapel, Electric Room	Rework ramps to provide accessible route. Replace door knobs with lever hardware along accessible routes. Renovate public and staff toilets to comply.
$18,697.00	11	Auditorium, Library	Small diameter (1-inch) handrails at connector do not meet criteria and should be replaced.
$987,222.00	12	Hospital	Many public and staff toilets do not comply or partially comply. Accessible toilets are limited to Ground and 1st Floor but not on the upper floors. Remodel to provide accessible facilities where required. Replace door knobs with lever hardware along accessible routes (approx 25 percent of doors).
$8,414.00	14	Facilities Management, MAS	Interior accessible routes and public and staff toilets on Floor 1 partially comply. Floor 2 Offices not accessible (less than 2,000 sf, no action recommended). Replace door knobs with lever hardware on Floor 1. Install lever faucets and grab bars at Floor 1 toilet.
$560,922.00	2	Dom Kitchen, EMS	Renovate public and staff toilets. Replace door knobs with lever hardware along accessible routes.
$137,114.00	20	Day Care/Quarters	Exterior entrances, interior accessible routes and stairs, and toilets partially comply with criteria. Ground Floor: accessible from rear. Construct ramps and landings for accessible entries to Floor 1. Renovate at least one (1) toilet for accessibility on Floor 1. Replace door knobs with lever handles along accessible routes.
$249,298.00	21	Apartments	Exterior entrances and interior accessible routes and stairs do not comply with criteria. Replace door knobs with lever hardware along accessible routes. Provide ramps to Ground and Floor 1. Renovate at least one (1) Apartment Unit for accessibility
$2,056,713.00	3	Dom Quarters, AMMS, Fiscal	* Interior accessible routes and ramps, public and staff toilets, Domiciliary resident rooms, toilets and bathing facilities do not comply with criteria. Renovate resident rooms, toilets and bathing facilities to meet accessibility criteria. Ramps from Arcade are up to 1:6 slope. Rework ramp from B to C Levels. Install elevator to provide access to all floors. * Replace door knobs with lever hardware throughout.
$2,461,823.00	5	Dom Quarters, Canteen	* Interior accessible routes and ramps do not comply. Ramps from Arcade are up to 1:6 slope. Rework ramp from B to C Levels and install elevator to provide access to all floors. * A Level Domiciliary resident rooms and A and B Level resident toilets and bathing facilities do not comply. Renovate resident rooms toilets and bathing facilities to meet accessibility criteria. C Level public and staff toilets do not comply and should be renovated. * Replace door knobs with lever hardware on approx 50 percent of all doors.
$24,930.00	53	Nutrition Food Svc, Eye, Podiatry	Public and staff toilets partially comply; remodel toilets and showers to meet criteria. Replace door knobs with lever hardware along accessible routes. (Basement toilets and locker costs included with Interior Finish/Door.)
$2,337,173.00	6	Dom Quarters, Warehouse	* Interior accessible routes and ramps do not comply. Ramps from Arcade are up to 1:6 slope. Rework ramp from B to C Levels and install elevator to provide access to all floors. * Domiciliary resident rooms and toilets and bathing facilities do not comply. Renovate resident rooms toilets and bathing facilities to meet accessibility criteria. * Replace door knobs with lever hardware throughout building.
$31,162.00	66	Fire & Security	Replace door knobs with lever hardware. Renovate public (office) toilet to meet criteria.
$3,116,231.00	7	Dom Quarters, Arts & Crafts	* Interior accessible routes and ramps do not comply. Ramps from Arcade are up to 1:6 slope. Rework ramp from B to C Levels, and install elevator to provide access to all floors. * Domiciliary resident rooms, and toilets and bathing facilities do not comply. Renovate resident rooms, toilets and bathing facilities to meet accessibility criteria. * Replace door knobs with lever hardware throughout.
$3,116,231.00	8	Dom Quarters, Recreation	* Interior accessible routes and ramps do not comply. Ramps from Arcade are up to 1:6 slope. Rework ramp from B to C Levels, and install elevator to provide access to all floors. * Replace door knobs with lever hardware throughout. * Domiciliary resident rooms, and toilets and bathing facilities do not comply. Renovate resident rooms, toilets and bathing facilities to meet accessibility criteria.
$49,860.00	9	Protestant Chapel	Rework ramps to provide accessible route. Replace door knobs with lever hardware along accessible routes. Renovate public and staff toilets to comply.
$15,218,115.00	**TOTAL**		

A separate study, "Analysis of VA Cost Options for VA Facilities with Status Quo Option; Updated with Input from Historic Architect" (Jones Lang LaSalle 2012a) reported the following (Table 1-4) overall costs of needed renovations and continuing operations at the Hot Springs VAMC:

Table 1-4. 30-Year Costs of Renovations and Continuing Operations at Hot Springs VAMC

Item	Cost [1]
Non-recurring (renovation and other capital investment) life cycle costs	$63,184,331
Recurring life cycle operating costs:	$140,797,070
Total	**$203,981,401**

[1] In 2012 dollars.

1.2.2.1.3 Limited Ability to Meet Current VA Standards for Residential Treatment

The facility requirements outlined in the VA Design Guide PG-18-12, Mental Health, are based upon the VA Office of Mental Health Services operating principles. These principles emphasize residential rather than institutional-like settings and include the ability to accept single Veterans with children. The residential setting should help Veterans improve their life skills and be complemented by access to jobs, long-term housing, education, and social services agencies.

Single Parent Veterans

Eleven percent of women service members are single parents, compared with four percent of men (DAV 2014). The American Legion (n.d.) has published statistics identifying this emerging issue:

> Women who are separating from service are 3.6 times more likely to become homeless than their non-military counterparts. A very disturbing fall out from the war is that, according to the National Coalition for Homeless Veterans . . ., 9 percent of the homeless veterans of the War on Terror are women. There is also an increase in the number of homeless women veterans who have children.

Disabled American Veterans published an in-depth analysis (DAV 2014) of challenges faced by female veterans; key statements include the following:

- Key Recommendation 5: VA should establish child care services as a permanent program to support health care, vocational rehabilitation, education and supported employment services.
- VA's efforts to eliminate veterans' homelessness have been impressive and are showing measurable success. However, women veterans still have higher rates of homelessness than their non-veteran counterparts and housing support needs to be enhanced, particularly for women with dependent children.
- Key Recommendation 25: VA and [the Department of Housing and Urban Development] should invest in additional safe transitional and supportive beds designated for women veterans.
- Key Recommendation 26: VA should work with community partners to provide housing programs to accommodate women veterans with families.

- On average, women are younger than men who use the VA health care system and many new veterans are of childbearing age. . . . This changing demographic has also meant that there has been increasing demand for on-site drop-in child care for veteran parents using VA medical and social support services.
- Finding: VA's efforts to eliminate veterans' homelessness have been impressive and are showing measurable success. Women veterans still have higher rates of homelessness than their non-veteran counterparts and housing support needs to be enhanced particularly for women with dependent children.
- Recommendation: VA and [the Department of Housing and Urban Development] should invest in additional safe transitional and supportive beds designated for homeless women veterans, especially those with children.

The need for VA to ensure that new or renovated health care and residential facilities can accommodate single-parent Veterans has been recognized by VA BHHCS, although VA does not currently have a formal policy or statement identifying this as an agency goal or priority. VA BHHCS intends to improve support for single parent Veterans, particularly for the residential services available.

Recovery Model of Care

The domiciliary's location in Hot Springs is not consistent with the "recovery" model of care. The setting of an RRTP should help Veterans improve their life skills and be complemented by access to jobs, public transportation, long-term housing, education, acceptable activities/diversion, and other social services agencies. A larger city would offer a greater depth of community services, more housing choices and capacity, a wider range of employment and educational opportunities, and a more robust clinically skilled labor force to support recovery.

Layout of Hot Springs Domiciliary

The current Hot Springs VAMC domiciliary layout, including open-bay sleeping and communal bathrooms, does not meet current VA standards for delivery of health care for RRTP.

VHA Handbook 1162.02, "Mental Health Residential Rehabilitation Treatment Program (MH RRTP)," establishes the procedures for VA's RRTP level of care. The existing domiciliary layout is not consistent with one item within this standard, which, states that the Facility Director must, among other requirements, "ensure the environment is designed to promote an individual sense of well-being, optimism, and integration with the surrounding community (as opposed to a hospital- or dormitory-like dwelling)."

The VA "Mental Health Facilities Design Guide" (VA 2010b) provides further technical, architectural, and engineering specifications; and "emphasizes principles, and strategies for building state-of-the-art, recovery-oriented environments" for VA mental health settings. The existing configuration of the residential facilities at the Hot Springs VAMC does not fully meet that guidance for the issues listed in Table 1-5.

Table 1-5. Hot Springs VAMC Deficiencies – Design of Mental Health Facilities.

VA "Mental Health Facilities Design Guide" Principal or Criteria	Hot Springs VAMC Description
Principle #1: Mental health services should be recovery-oriented • Patient and family-centered • Rehabilitation/recovery-focused • Evidence-based • Emphasis on community reintegration	No accommodations for single-parent Veterans. Small town setting offers limited opportunities for employment, housing, and permanent re-integration.
Principle #2: Mental health services should be provided in a therapeutically enriching environment • Home-like • Familiarity • Visual and physical access to nature to promote healing • Patient autonomy, respect, and privacy	The domiciliary is an institutional (dormitory or hospital-like) setting. Patient autonomy and privacy are constrained by partial bedroom walls and shower-curtain doors, and the unit-wide restroom, shower, laundry, and kitchenette facilities.
Principle #5: Mental health services should be provided in settings that respect and can accommodate a diverse range of patient populations and care needs • Provide appropriate accommodations for specific patient groups • Promote safety, privacy, and dignity of female Veterans • Provide separation within inpatient units or provide distinct units, where necessary	Patient privacy is constrained by partial-height bedroom walls and shower-curtain doors, and the unit-wide restroom and shower facilities.
Key design concepts for RRTPs (Chapter 3 of Guide) include independent living: • Resident rooms within a MH RRTP facility should be residential in character. • The multiple occupancy living units accommodates living, dining and limited kitchen facilities shared by up to four residents. The goal of this space is to replicate an independent living setting including simple meal preparation.	Resident rooms are institutional in character. Living, dining, limited kitchen, laundry facilities are shared by 8 to 16 residents.

1.2.2.1.4 Facility Costs Negatively Affect VA's Stewardship of Funds Appropriated for Veterans Health Care

VISN 23 (Midwest Health Care Network) includes the following health care systems: Fargo, Iowa City, Minneapolis, Nebraska Western Iowa, Sioux Falls, St. Cloud, Black Hills, and Central Iowa.

VISN 23's responsible stewardship of appropriated funds is impacted by VA BHHCS's high operating costs: the VA BHHCS cost per unique patient is the highest among VISN 23 health care systems, many of which have facilities that offer more costly and more highly complex medical services compared to those available in VA BHHCS. Based on FY 2014 data, VA BHHCS's cost per unique patient (see text box) was approximately $9,404 and was $8,960 and $8,958 in FY 2013 and FY 2012, respectively (2015c). The FY 2014 cost was approximately 22 percent higher than the next highest cost (VA Minneapolis Health Care System at $7,713) and 23 to 65 percent higher than the other health care systems VISN-wide (whose costs per unique veteran ranged from $5,690 to $7,670 in FY 2014 (VA 2015c). At the Hot Springs VAMC specifically, the FY 2013 per-patient cost was $9,099, compared to $7,605 at Fort Meade VAMC (FY 2014 data not available) (Email message from DeAnne Pavel, VISN 23, to James Stewart et al., August 25, 2014).

> A ***unique patient*** is counted as unique in each division from which they receive care. For example, if a patient receives primary care at one VA facility and specialty care from another VA facility, they will be counted as one unique patient in each.

A contributing factor to the relatively high costs within VA BHHCS is the increasing age and cost of operating, maintaining, and improving buildings that range from 40 to over 100 years old. VA BHHCS maintains 464,000 square feet and 77 acres of property at Hot Springs and 820,000 square feet and 220 acres at Fort Meade. Both of these campuses must maintain a full suite of site services (fire department, security, laboratory, nutrition and food, radiology, and others) serving a total of more than 1.2 million square feet of space. Maintaining this costly infrastructure diverts financial resources from direct patient care.

As an executive branch agency, VA is subject to the provisions of the *Energy Policy Act of 2005* and the *Energy Independence and Security Act of 2007* that require federal agencies to achieve mandated energy and sustainability goals in new and existing buildings. Both acts define high-performance buildings as the integration and optimization on a life-cycle basis of all major high-performance attributes, including energy and water conservation, environment, safety, security, durability, accessibility, cost-benefit, productivity, sustainability, functionality, and operational consideration. The following excerpts from *Innovative 21st Century Building Environments for VA Health Care Delivery (Parts 1 and 2)* (VA 2009) concisely describe the basis for VA's direction toward providing services from modern new facilities compared to continued use of older, existing facilities:

- Transformation to 21st century care delivery presents . . . VA with critical challenges similar to those confronting private sector healthcare facility owners and operators. New healthcare facilities are subject to growing requirements for patient-centered care, increased productivity, reduced operating and maintenance expenses, enhanced energy and sustainability, higher disaster resistance, improved accessibility, and other societal objectives. Existing healthcare facilities can quickly become outdated as new medical practices and technologies emerge; older facilities are recognized as vulnerable to disasters and inaccessible to patients, caregivers, and other users. In addition, increasing operating costs in both new and existing buildings lead to deferred maintenance resulting in significant reductions in system performance.
- At the same time that energy and sustainability demands are forcing innovations in building design and operation, new care delivery methods and technologies are changing where, how, and by whom care is provided. The demand for higher performing facilities and the desire to provide world-class service to veterans and their families are driving VA to pursue new and

innovative solutions for care delivery. VA's buildings have been and are being produced under conditions that are insufficient to support future care delivery and technology developments, and, in fact, can often constrain their implementation [*emphasis added*]. True high-performance buildings will support the VA healthcare delivery mission and goals for transformation to 21st century care.

- Changes in healthcare delivery are taking place more quickly than present healthcare facilities can adapt. The facility itself will constrain care if it cannot be changed to accommodate newer methods of care delivery. Responsive, effective design based on optimized workflow has a strong impact on staffing required to deliver care as well as the quality of that care, resulting in a care model that delivers high quality outcomes for less costs and resource requirements than is the standard today. Future healthcare facilities should be designed with flexibility to accommodate growth and expansion and critical changes in clinical flow patterns.

1.2.2.2 Factors Contributing to Constraints on Services and Access Due to Existing Locations

1.2.2.2.1 Locations of Veteran Population Compared to VA Medical Facilities

Current and Projected Veteran Population Locations

The existing VA BHHCS facilities are not in the same locations as Veteran population centers. Pennington County, SD, had the highest population of Veterans in FY 2014 at 12,433; approximately 60 percent were enrolled to receive VA health care services.

Proximity to an individual's primary care provider, in particular, is important. In FY 2014, 16,876 Veterans were receiving primary care through the VA BHHCS, with the majority going to Fort Meade, followed by Rapid City, Hot Springs, Pierre, and other sites. Figure 1-2 illustrates the proportion of patients receiving primary care from each source (Email message from L. Epperson, VA BHHCS, to C. Modovsky, October 29, 2014).

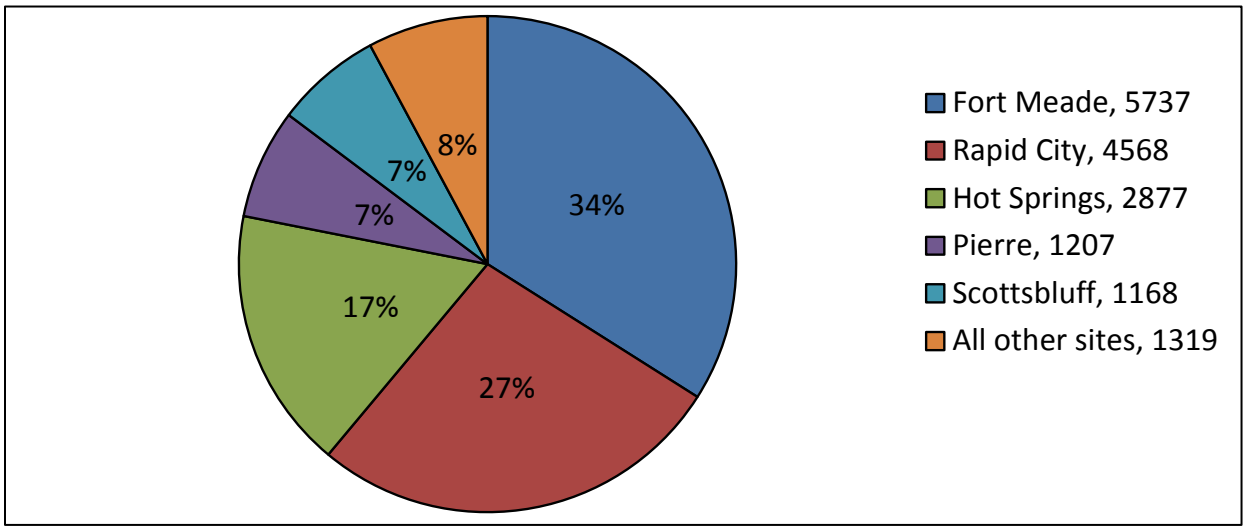


Figure 1-2. Patients Receiving Primary Care by Location, FY 2014.

Population data show that, for FY 2012 through FY 2013, VA BHHCS health care facilities served 983 unique patients residing in Fall River County (where the Hot Springs VAMC is located), compared to 5,928 unique patients from Pennington County (where the Rapid City CBOC is located). These data indicate that Rapid City would be a more central location for providing medical services to Veterans compared to Hot Springs.

Exhibit 1 on the following pages provides additional detailed discussion of Veterans' locations compared to services received.

Critical Mass of Patients to Support a Service or Specialty

Hot Springs VAMC has insufficient patient volume to support services or specialties in addition to those currently provided. In fact, some of the services currently provided are not adequately supported.

For any particular health service, a certain patient volume is required for a facility to responsibly offer that service, medically and financially. In 2010, VA completed a nationwide review of surgical facilities and classified each one to ensure that scheduled (non-emergency) surgical procedures do not exceed the infrastructure capabilities (see www.va.gov/health/surgery/). Facility infrastructure refers to diagnostic evaluation; consultation; surgical physician staffing; operating room staffing, instruments, equipment, coverage, and radiology; anesthesia services; post-anesthesia care unit; intensive care unit; ward; supply, processing, and distribution; and other support services related to a surgical procedure. Each inpatient surgical program was assigned a "surgical complexity" level of *standard* (such as an appendectomy), *intermediate* (such as a shoulder joint reconstruction), or *complex* (such as coronary artery bypass surgery); and each ambulatory (outpatient only) surgery center was assigned a surgical complexity level of either *basic* (for example, surgical removal of a skin cancer) or *advanced* (such as laparoscopic gallbladder removal). A facility can request a change to a more or less complex designation in compliance with VA policies on restructuring clinical programs and with documented changes in infrastructure.

Exhibit 1
Discussion: Locations of Veterans and Services

VA BHHCS provides health care services to Veterans primarily from the states that the service area covers (South Dakota, Nebraska, and Wyoming) but also to Veterans from a number of other states outside the service area. The table below shows the number of Veterans by their location of residence who had been served by the VA BHHCS between FY 2012 and FY 2014. Of the 22,334 Veterans served over the past three years, approximately 74 percent (16,470) were from the 34 counties that comprise the VA BHHCS service area. South Dakota represents the largest concentration of Veterans (inside and outside the service area) served by VA BHHCS. Veterans from 41 different states and territories received service, with Colorado and North Dakota the residence of the largest number of Veterans outside the service area at 592 and 528, respectively.

Number and Residence of Veterans Served by VA BHHCS, FY 2012-2014.

Veteran Residence Location	Number of Veterans Served
Within VA BHHCS Service Area	
South Dakota	13,335
Nebraska	2,564
Wyoming	571
Subtotal	16,470
Outside VA BHHCS Service Area	
South Dakota	1,394
Colorado	592
North Dakota	528
Wyoming	470
Nebraska	398
Montana	342
Arizona	255
Texas	174
Florida	166
Minnesota	161
California	158
Other States/Territories	1,226
Subtotal	5,864
Total	22,334

Source: VA 2015d.

One way that VA tracks health care services is by patient care encounters (PCEs). A PCE is a contact between patient and a provider who has primary responsibility for assessing and treating the patient during an appointment, by telephone, or as a walk-in. A patient may have multiple PCEs for one appointment or during a single visit to a VA facility.

Exhibit 1
Discussion: Locations of Veterans and Services (continued)

The following table lists the number of PCEs at each VA BHHCS facility for FY 2014, along with the number of patients (Veterans) that generated the PCEs. One Veteran can have multiple PCEs at more than one facility; however, each Veteran is counted only once in the patient totals for each facility regardless of the number of visits or PCEs recorded for the Veteran at that facility. As shown in the table, there were 362,272 PCEs by 32,851 patients at 13 VA BHHCS facilities during FY 2014. The majority (52.1 percent) of all PCEs occurred at the Fort Meade facility and 34.1 percent occurred at the Hot Springs facility. The number of patients with a PCE at Fort Meade (15,326) was more than double the number of patients with a PCE at Hot Springs (6,861).

Patient Care Encounters at VA BHHCS Facilities, FY 2014.

VA BHHCS Facility Location	Patient Care Encounters	Percent Total	Patients
Fort Meade	188,571	52.1%	15,326
Hot Springs	123,668	34.1%	6,898
Rapid City	33,914	9.4%	6,462
Scottsbluff	5,925	1.6%	1,389
Pierre	4,340	1.2%	1,381
Winner	1,833	0.5%	515
Eagle Butte	1,772	0.5%	258
Pine Ridge	876	0.2%	179
McLaughlin	436	0.1%	162
Gordon	422	0.1%	140
Mission	325	0.1%	84
Newcastle	193	0.1%	57
Total	362,272	100%	32,851

Source: VA 2015e, 2015f.

Exhibit 1
Discussion: Locations of Veterans and Services (continued)

The PCEs completed at the Hot Springs facility (123,589) in FY 2014 were further evaluated to understand the specific types of services and encounters that occurred most often. As shown below, encounters related to the RRTP (41,827) represented 33.7 percent of the total. Telephone encounters, which include 16 sub-categories, represented the next largest number of PCEs at 15,006 or 12.0 percent of the total. There was an average of 341 PCEs per calendar day during FY 2014 at the VA Hot Springs facility.

Types of Patient Care Encounters at VA Hot Springs Facility, FY 2014.

Type of Encounter	Total	Average/ Calendar Day	Percent Total
All RRTP	41,827	115	33.7%
All telephone	15,006	41	12.0%
Respiratory therapy	8,249	23	6.7%
All outpatient primary care	8,121	22	6.5%
Clinical pharmacy	6,189	17	5.0%
All mental health	4,410	12	3.5%
Urgent care unit	3,697	10	2.9%
X-ray	3,691	10	2.9%
Assisted hemodialysis	3,157	9	2.6%
Optometry	2,270	6	1.6%
Physical therapy	2,268	6	1.6%
Dental	2,089	6	1.6%
Home telehealth non-video monitoring	2,026	6	1.6%
All nutrition	1,904	5	1.5%
Electrocardiogram	1,662	5	1.5%
Dermatology	1,541	4	1.2%
Podiatry	1,355	4	1.2%
Computerized tomography	1,011	3	0.9%
All home-based primary care	1,010	3	0.9%
Social work service	972	3	0.9%
All others	11,134	31	9.1%
Total	123,589	341	100%

Source: VA 2015e.

Exhibit 1
Discussion: Locations of Veterans and Services (continued)

The table below shows the PCEs that occurred at the VA Hot Springs facility during FY 2014 by the locations of the Veterans' residence. Veterans residing within the VA BHHCS service area accounted for 72.1 percent of the total PCEs (123,589). Veterans from other states outside the three-state area of South Dakota, Nebraska, and Wyoming accounted for more than 20.8 percent of the total PCEs.

Patient Care Encounters at VA Hot Springs Facility by Veterans Residence, FY 2014.

Veteran Residence Location	Patient Care Encounters	Percent Location Total	Percent Facility Total
Within VA BHHCS Service Area			
Fall River County, SD	31,727	35.6%	25.7%
Pennington County, SD	12,047	13.5%	9.7%
Other South Dakota counties	25,154	28.2%	20.4%
Nebraska counties	17,307	19.4%	14.0%
Wyoming counties	2,848	3.2%	2.3%
Location Total	**89,083**	**100%**	**72.1%**
Outside VA BHHCS Service Area			
South Dakota	3,571	10.3%	2.9%
Nebraska	2,652	7.7%	2.1%
Wyoming	2,520	7.3%	2.0%
Other states	25,763	74.6%	20.8%
Location Total	**34,506**	**100%**	**27.9%**
Hot Springs Facility Total	**123,589**	**100%**	**100%**

Source: VA 2015e.

In addition to the 362,272 PCEs (65.7 percent) that occurred at VA BHHCS facilities, another 189,254 encounters (34.3 percent) occurred at non-VA facilities for a total 551,526 encounters during FY 2014 (VA 2015e). The encounters at non-VA facilities are recorded into broad categories. The categories that accounted for almost two-thirds of the total encounters in FY 2014 included:

- Evaluation and management (emergency room, critical care, inpatient) – 20,388
- Medicine (physical therapy, acupuncture, chiropractic care, cardiovascular, ophthalmology) – 46,466
- Pathology and laboratory – 19,761
- Radiology and nuclear medicine – 18,182
- Surgery – 17,472

The Hot Springs VAMC was designated as a basic-level ambulatory surgical facility. This current designation limits the types of procedures that surgeons and the support team can conduct at the facility. Prior to this designation in 2010, VA BHHCS had been discontinuing providing certain medical services at the Hot Springs VAMC at points when the infrastructure (as described in the preceding paragraph) was determined to no longer safely support that service or type of care. This prospective mitigation of risk was to specifically prevent an increased rate of unfavorable medical events. For current inpatients at the Hot Springs VAMC, physicians carefully review the support care known to be needed or that potentially could be needed to determine whether it is available, and, if not, the patient is transferred to Fort Meade or to a community provider where the appropriate level of medical care can be provided to the patient.

Some of the concerns generated by the low patient volume at Hot Springs VAMC include:

- The availability of a surgeon and other health care providers after a surgery in the case of post-operative complications.
- The Hot Springs VAMC has a low inpatient census, averaging 5 patients in the 10 available beds. When alcohol detoxification, which is provided on an outpatient basis in most treatment settings, is subtracted, the average inpatient census decreases to less than 4 patients. This low patient volume detracts from a licensed professional staff member's ability to attain and retain core competencies; see Section 1.2.2.1.1.
- Within a finite budget, VA must ensure that resources are appropriately allocated and reasonably balanced among all eligible Veterans throughout the entire VISN. A consideration in determining which medical specialties are offered at specific VISN locations is whether the size of the Veteran population within a reasonable driving distance (see Section 1.2.2.2.2) correlates with an appropriate per-patient cost. If the size of the area containing a sufficient Veteran population for supporting a specialty must be drawn too widely, choices must be made regarding offering that specialty in-house and whether non-VA care purchased from community providers could offer better geographic access to the Veteran population, as funds generally do not allow for both approaches to providing a single specialty service within the same geographic area

Because community providers of urgent care and specialty services are available in this highly rural area, VA BHHCS maintains a program for Veterans to obtain purchased care from non-VA providers. VA has found this approach to be medically responsible and fiscally reasonable. In addition, it relieves Veterans throughout the catchment area from the travel burdens that would be imposed if, in order to support a particular specialty at Hot Springs, Veterans were then required to use a VA provider to ensure adequate patient volume to support that service.

1.2.2.2.2 Distance Veterans Must Travel for Care

Maintaining multiple VA providers of advanced care and specialty services in a highly rural (seven or fewer Veterans per square mile) health care system like VA BHHCS can be inconsistent with ensuring that Veterans have reasonable distances to travel to receive care. This is because VA would not be able to both support the costs of maintaining a specialty in-house and pay outside providers for the same specialty services. Table 1-6 lists VA guidelines for driving time.

Table 1-6. VA Driving Time Guidelines.

Level of Care	Driving Time (minutes)			Threshold Criteria
	Urban Setting	Rural Location	Highly Rural	
Primary Care Main health care provider seen on regular basis; first, most generalized stop for symptoms.	30	30	60	70%
Secondary Care Care by someone with specific expertise in condition, generally by reference from primary care physician.	60	90	120	65%
Tertiary Care Hospitalized patient needing higher level of specialty care within the hospital; includes highly specialized equipment and surgery.	240	240	Within VISN	65%

Source: VA 2004.

There is a need to provide better geographic access (and reduce driving times) to health care facilities for Veterans living in the highly rural catchment area. By VA standards, driving times now are too long, especially to reach secondary health care facilities. Secondary/specialty care is currently provided at the Hot Springs VAMC (limited) and the Fort Meade VAMC; VA tertiary care facilities are located in Omaha and Minneapolis. Scarce medical specialties are either not available or not accessible in the catchment area. Figure 1-3 shows current driving times for secondary care access.

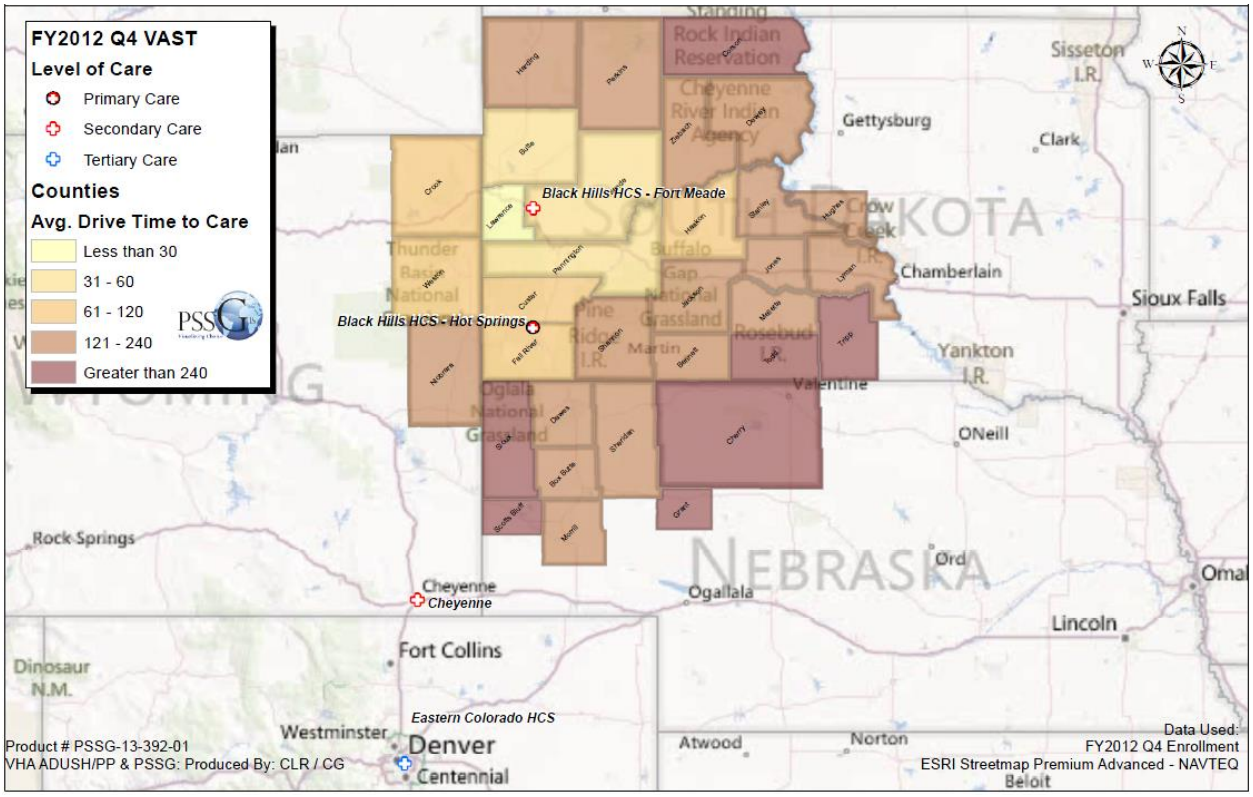


Figure 1-3. Driving Times for Secondary Care in VA BHHCS.

Total Veterans and enrollment for the VA BHHCS catchment area are projected to remain stable over the next 20 years, but with a shift toward more Veterans and enrollees in the existing higher population centers. Pennington, Meade, and Lawrence Counties, SD, and Scotts Bluff County, NE, are the population centers and are all projected to increase in Veteran population and enrollment within the 20-year horizon. Other counties in the catchment area are projected to remain stable or slightly decline.

1.3 Scope of this EIS

The scope of the analysis in this EIS is evaluating the potential environmental impacts of alternatives that might meet the purpose of and need for the proposed reconfiguration of the VA BHHCS. As required by NEPA, the potential environmental impacts of taking no action on the proposal are also evaluated.

This EIS analyzes impacts to the natural and built environment from the alternatives for changes to the physical facilities from which health care services are offered within the VA BHHCS catchment area. These physical facilities are owned or leased by VA. Constructing, leasing, renovating, re-using, re-purposing, or vacating one or more facilities to meet the stated purpose and need for reconfiguration is the focus of this EIS. VA BHHCS has invited public input to the NEPA process on the proposal and potential environmental impacts of the alternatives. The alternatives that involve vacating the existing Hot Springs campus have attracted public attention and generated other alternatives offered by the public and considered by VA. The public's concerns related to potential impacts to historic resources and socioeconomic conditions are within the scope of this NEPA analysis and are evaluated in detail in this EIS.

It is beyond the scope of this EIS to determine the specific health care services that VA offers to Veterans at any location. These are decisions made by VHA's leaders, planners, and health care practitioners to further the VHA mission to "Honor America's Veterans by providing exceptional health care that improves their health and well-being." Each facility's medical services and associated support processes are monitored and adjusted based on VHA standards of care to ensure that Veterans and their families receive high-quality and safe care. These standards of care also ensure that, when needed, a patient is moved or referred to a facility that provides a higher level of care or a specialty service.

Although decisions about health care services are not within the scope of this EIS, decisions regarding appropriate physical buildings and infrastructure required to provide these services are the focus of this EIS and the NEPA process. For example, the number of patients receiving primary care determines the size of waiting rooms, number of exam rooms, size of the parking lot, and number of physician offices. Specialty services such as laboratories or operating rooms require spaces specifically designed for those purposes. Thus, while decisions on health care services offered are not subject to NEPA analysis, the scope of the NEPA decision does include changes to the facilities whose design is driven by VA's projections for services. The EIS often refers to the types of services needed wherever this information clarifies the need for a specific type of facility, new/changed facility, or size of a building.

In addition, the EIS includes information on alternatives for Veterans to receive some care that would be paid for by VA, at community or IHS clinics and hospitals. VA's decisions about reimbursing other providers of health care for Veterans, or the comparative quality or advisability of

using other providers, is an important agency responsibility. Such decisions are not subject to an environmental impact analysis under NEPA; however, they are an important consideration in identifying where VA facilities should be located to adequately meet the needs of Veterans throughout the catchment area and are thus discussed where appropriate in this EIS.

1.4 Integration of *National Historic Preservation Act* Section 106 Process

Section 106 of NHPA requires a federal agency to determine and consult on the effects of its undertaking on historic properties. The Hot Springs VAMC occupies the buildings constructed in 1907 as the Battle Mountain Branch of the National Home for Disabled Volunteer Soldiers. This property is listed on the National Register of Historic Places as a National Historic Landmark and as a contributing resource to the Hot Springs Historic District.

Section 106 review and consultation usually is carried out separately from the NEPA process. However, in the interest of efficiency, completeness, and facilitating public involvement, VA is substituting the implementation and review procedures of Section 102 of NEPA for consultation under Section 106 of the NHPA. This process meets the integration intent of the NEPA regulations (40 CFR 1500.2(c) and 1502.25(a)) and the substitution intent of the NHPA regulations (36 CFR 800.8(c)). Under the integrated substitution process, Section 106 review and consultation proceeds concurrently with the EIS, and the EIS includes identification and evaluation of impacts to historic properties. This process follows the joint CEQ–ACHP guidance for integrating NEPA and Section 106 compliance (CEQ-ACHP 2013) to complete the following activities:

- **Initiate the process.** VA determined the undertaking, described in Chapter 2; notified the ACHP, the State Historic Preservation Office (SHPO), the National Park Service (NPS), and affected Tribal Historic Preservation Officers of VA's intent to use the NEPA process for Section 106 purposes; identified tribes and other consulting parties to participate in the Section 106 process; and through extensive EIS scoping offered all interested stakeholders and members of the public mechanisms to obtain details of the undertaking as well as provide input to the issues evaluated in the integrated NEPA/NHPA process. The agency coordination and public involvement activities, including Section 106 consultation, are described in Chapter 6.
- **Identification of historic properties**. Section 3.3 describes the Affected Environment for this NEPA analysis as it relates to cultural resources, including the area of potential effects and historic properties, as developed in consultation with consulting parties and public scoping input.
- **Assessment of adverse effects**. The potential effects of the alternatives to historic resources that are listed or eligible for listing on the National Register of Historic Places are evaluated in Section 4.3. Consultation with SHPO, ACHP, NPS, and other consulting parties and scoping input from the public was considered throughout this evaluation.
- **Resolution of adverse effects.** In consultation with SHPO, ACHP, NPS, and other consulting parties, VA developed mitigation measures to resolve adverse effects to historic properties. These are described in Section 4.3 and summarized in Chapter 5.

1.5 Relevant Statutes, Regulations, and Executive Orders

National Environmental Policy Act

NEPA requires federal agencies to consider the potential impacts of projects, policies, programs, funding decisions and other agency actions on the environment. NEPA integrates environmental planning requirements into agency decision-making.

National Historic Preservation Act

NHPA declared that it is the policy of the federal government to, among other goals, "Administer federally owned, administered, or controlled prehistoric and historic resources in a spirit of stewardship for the inspiration and benefit of present and future generations." The most relevant provisions of the Act for this EIS are Sections 106 and 110.

Section 106 requires all federal agencies to review the effects of actions permitted or funded directly or indirectly by the federal government ("an undertaking") on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places, and to take those effects into account as part of the assessment of the project. Federal agencies must also provide the ACHP the opportunity to comment on such undertakings. While such undertakings are often necessary to fulfill the mission of an agency, this section ensures that the agency considers cultural resources in the planning of such projects, and seeks to avoid, minimize, or mitigate adverse effects to the cultural resources in its decisions and agreements. The implementing regulations for the Section 106 process are provided at 36 CFR Part 800: Protection of Historic Properties.

Section 110 ensures that historic preservation is fully integrated into the ongoing programs of all federal agencies. Among its requirements are for each agency to establish a preservation program to identify, evaluate, nominate to the National Register, and protect historic properties; consult with other federal, state, and local agencies, tribes, and other parties on its historic preservation planning activities; and minimize harm from its undertakings to National Historic Landmarks. Section 110 states that "Prior to acquiring, constructing, or leasing buildings for purposes of carrying out agency responsibilities, each federal agency shall use, to the maximum extent feasible, historic properties available to the agency in accordance with Executive Order No. 13006." This executive order is titled *Locating Federal Facilities on Historic Properties in our Nation's Central Cities*, and states "the Federal Government shall utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in our central business areas."

Council on Environmental Quality Regulations for Implementing NEPA

The CEQ is a division of the Executive Office of the President that coordinates federal environmental policy by working closely with agencies and other executive offices. The Chair of CEQ acts as the top environmental policy advisor to the President. Congress established CEQ through NEPA to ensure federal agencies meet their obligations under the Act. CEQ developed regulations for implementing NEPA (40 CFR Part 1500) and publishes guidance documents to assist agencies with compliance.

Executive Order 11593 – Protection and Enhancement of the Cultural Environment

This executive order directs federal agencies to locate, inventory, and nominate properties under their jurisdiction or control to the National Register of Historic Places if they qualify.

Executive Order 11988 – Floodplain Management

Federal agencies are required to avoid actions that adversely impact floodplains where there are practicable alternatives and to minimize environmental harm. Each federal agency must evaluate the potential effects of an action in a floodplain and ensure planning programs and budget requests consider flood hazards and floodplain management.

Executive Order 11990 – Protection of Wetlands

Each federal agency must take action to minimize the destruction, loss, or degradation of wetlands and preserve and enhance the values of wetlands in carrying out agency responsibilities. An agency must follow this order when acquiring, managing, and disposing of federal lands and facilities; financing, constructing, or assisting in construction and improvements; and conducting federal activities and programs affecting land use. The order does not apply to permits, licenses, or other activities involving wetlands on non-federal property. Each agency must allow the public to review plans or proposals for new construction in wetlands early in the planning process.

Executive Order 12898 – Environmental Justice

Executive Order 12898 directs each federal agency to make environmental justice part of its mission. A federal agency will identify and address the human health or environmental effects of its actions on minority and low-income populations.

Executive Order 13007 – Indian Sacred Sites

Federal agencies are directed to accommodate access to and ceremonial use of American Indian sacred sites by their religious practitioners, and avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies are to maintain the confidentiality of sacred sites.

Executive Order 13175 – Consultation and Coordination with Indian Tribal Governments

This order supplements the Executive Memorandum (dated April 29, 1994) entitled, "Government-to-Government Relations with Tribal Governments," and states that each executive branch department and agency shall consult with tribal governments on, and assess the impacts of, federal plans, projects, programs, and activities that may affect tribal resources.

Executive Order 13287 – Preserve America

Federal policy is established to advance the protection, enhancement, and contemporary use of the historic properties owned by the federal government and promote intergovernmental cooperation and partnerships for the preservation and use of historic properties.

Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management

This order instructs federal agencies to conduct their environmental, transportation, and energy-related activities in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.

Executive Order 13693 – Planning for Federal Sustainability in the Next Decade

This 2015 order sets policy and goals for federal agencies to maintain federal leadership in sustainability and greenhouse gas emission reductions. Through a combination of more efficient federal operations as detailed in the order, agencies are directed to reduce direct greenhouse gas emissions by at least 40 percent over the next decade while at the same time fostering innovation, reducing spending, and strengthening the communities in which federal facilities operate. The order

also includes specific sustainability goals related to building energy conservation, efficiency, and management; using renewable and alternative sources for electrical energy, with specific goals for clean energy use by year; improving water use efficiency and management, including stormwater management; improving fleet and vehicle efficiency and management; use of recycled and sustainably produced materials; advancing waste prevention and pollution prevention; and promoting electronics stewardship.

Appendix A lists environmental permits potentially required to implement the project proposal.

1.6 Organization of this Environmental Impact Statement

This EIS is organized in the format recommended by CEQ (40 CFR 1502.10) and includes:

- Cover Sheet, Executive Summary, Table of Contents, and Acronyms and Abbreviations.
- **Chapter 1: Introduction, including Purpose and Need** presents background information and the purpose and need for proposing to reconfigure the VA BHHCS health care services.
- **Chapter 2: Alternatives** describes each of the alternatives evaluated, including taking no action, and summarizes alternatives that were considered but not evaluated in detail.
- **Chapter 3: Affected Environment** describes the natural and human environment within the area that could be affected by the proposal.
- **Chapter 4: Environmental Consequences** is the assessment of the potential environmental impacts of the alternatives.
- **Chapter 5: Mitigation, Monitoring, Minimization, and Best Practices** discusses the measures identified to minimize or mitigate for the adverse impacts identified in Chapter 4.
- **Chapter 6: Public Involvement and Agency Coordination** summarizes the process to involve the public and the input received during the scoping process, integrated NHPA Section 106 consultation process, and, in the Final EIS, comments received on the Draft EIS. This chapter also summarizes coordination with federal, state, and local agencies.
- **Chapter 7: List of Preparers** provides the names, education, and experience of the individuals involved in the preparation of the EIS.
- **Chapter 8: References** lists the references cited in the EIS.
- **Chapter 9: Glossary** provides definitions of the technical terminology used in the EIS.
- **Appendices:**

  A. Permits

  B. Save the VA Proposal

  C. NEPA/NHPA Substitution Process

  D. Summary of Public Scoping

  E. Draft EIS Comments and Responses (in Final EIS)

2.0 ALTERNATIVES

The *National Environmental Policy Act* (NEPA) and the Council on Environmental Quality's and Department of Veterans Affairs (VA's) NEPA regulations require rigorous exploration and objective evaluation of all reasonable alternatives for implementing a proposal. This environmental impact statement (EIS) evaluates the potential environmental consequences of six alternatives including No Action, as well as a supplement to four of the alternatives. This chapter describes the development of the alternatives, the details of the alternatives, and other alternatives identified but eliminated from detailed analysis.

2.1 Development of Alternatives

As early as 2006, VA Black Hills Health Care System (BHHCS) recognized that the issues described in Section 1.2 *Purpose of and Need for Reconfiguration of the BHHCS* would require changes to the health care system. VA BHHCS also recognized that they would need to do more than change the set of services offered from existing locations, and would have to consider changes to the actual facilities from which the health care system operates. By 2011, VA BHHCS's internal analysis had coalesced around specific recommendations for reconfiguring services that involved changes to the facilities from which VA BHHCS operated. In July 2011, VA BHHCS presented the Secretary of VA with a preliminary option for a phased approach to (1) re-locating services from the VA-owned Hot Springs VA Medical Center (VAMC) and Rapid City community-based outpatient clinic (CBOC) leased space; (2) providing these services from a new Hot Springs CBOC, Rapid City multi-specialty outpatient clinic (MSOC), and Rapid City residential rehabilitation treatment program (RRTP); and (3) offering the Hot Springs campus for an enhanced-use lease. These features have been incorporated into one of the alternatives analyzed in this EIS, Alternative A. At the Secretary's direction, VA BHHCS developed details of requirements, timelines, and compliance needs, and presented the reconfiguration proposal for public feedback at 15 public town hall meetings and 8 VA employee meetings from December 2011 through June 2012. During this time, VA BHHCS leadership also met with local, state, and federal government officials; Veterans service organizations; representatives from private health care facilities; and community and tribal leaders. For the next two years, VA continued discussions with the community, identified and evaluated aspects of alternative approaches, and responded to inquiries.

The May 16, 2014, *Notice of Intent to Prepare an Integrated EIS* identified seven potential action alternatives and the no action alternative:

- Building/leasing a CBOC in Hot Springs and an MSOC/100-bed RRTP in Rapid City
- Building/leasing a 100-bed RRTP in Hot Springs and an MSOC in Rapid City
- Renovating Building 12 for a CBOC and the domiciliary for a 100-bed RRTP at VA's existing Hot Springs campus and building/leasing an MSOC in Rapid City
- Building/leasing a CBOC and 24-bed RRTP in Hot Springs and an MSOC and 76-bed RRTP in Rapid City
- The "Save the VA" proposal
- An as-yet unidentified alternative use that might be proposed during the EIS process

- A supplemental alternative to repurpose all or part of the Hot Springs campus through an enhanced-use lease or other agreement with another governmental agency or private entity in conjunction with one of the other action alternatives
- No action

This EIS evaluates the potential environmental impacts of alternatives for new facilities and changes to existing facilities; the need for changes to facilities is based on the need for changes in medical services to meet the purpose of and need for action. Actual changes to medical services provided by any VA facility, in the near term or future, are not subject to NEPA review. However, the proposed changes to the facilities result from the services reconfiguration throughout the VA BHHCS catchment area. Scoping for this EIS identified the location of specific VA medical services as a topic of great interest and concern to the Veteran community. The health care service offerings in Hot Springs and Rapid City associated with each alternative for new or renovated facilities are summarized in Table 2-1, but the health care services themselves are not an inherent or unchangeable component of any alternative evaluated in this EIS.

As shown in Table 2-1, under some of the alternatives, there are some services that have been provided for Veterans by VA BHHCS that would no longer be offered at a VA facility in Hot Springs, but these services would be available locally through purchased care (care from non-VA community providers).

The overall services reconfiguration proposal for VA BHHCS under Alternatives A, B, C, and D also includes the addition of purchased care for Veterans from 3 tertiary care facilities and 26 secondary care facilities within the VA BHHCS catchment area, which would provide notable improvement to the system's compliance with VA's "Geographic Access to Care" guidelines (VA 2005), as shown in Table 2-2.

Tertiary care is a higher level of specialty care within a hospital, including highly specialized equipment and surgery. The three proposed additional community providers are St. Mary's Healthcare Center (Pierre, SD); Regional West Medical Center (Scottsbluff, NE); and Rapid City Regional Hospital (Rapid City, SD)

Secondary care providers have specific expertise in a condition, generally by reference from primary care physician. The 26 proposed additional community providers include 18 critical access hospitals (6 in NE, 8 in SD, 4 in WY) and 8 Indian Health Service (7 in SD and 1 in ND).

Source: VA 2015.

Table 2-1. Health Services by Location Associated with the EIS Alternatives.[1]

Service	Source					
	Alternative A	**Alternative B**	**Alternative C**	**Alternative D**	**Alternative E**	**Alternative F**
Hot Springs Area						
Primary care Dialysis Mental health	New CBOC	New CBOC	CBOC in Building 12	New CBOC	Hot Springs VAMC	Hot Springs VAMC
Inpatient beds	Community	Community	Community	Community	Hot Springs VAMC: 15 acute care beds 3 intensive care unit beds	Hot Springs VAMC (10 beds)
Laboratory Pharmacy Urgent care	Community	Community	Community	Community	Hot Springs VAMC	Hot Springs VAMC
Surgery	Community	Community	Community	Community	Hot Springs VAMC – outpatient surgery: • General surgery: screening / diagnostic endoscopy (upper gastrointestinal system and colon exams) and similar complexity • Specialty surgery: orthopedic, urologic, ophthalmic	Hot Springs VAMC (basic outpatient)

Table 2-1. Health Services by Location Associated with the EIS Alternatives[1] (continued).

Service	Source					
	Alternative A	**Alternative B**	**Alternative C**	**Alternative D**	**Alternative E**	**Alternative F**
Specialty care	Expanded at new CBOC + community	Expanded at new CBOC + community	Expanded at CBOC (Building 12) + community	Expanded at new CBOC + community	Hot Springs VAMC: • Cardiology • Internal medicine • Urology • Ear/nose/throat clinics • Respiratory care • Medical rehabilitation, including cardio-pulmonary • Clinical dietetics • Optometry • Clinical pharmacy • Dental	Limited at Hot Springs VAMC + community
Medical imaging	Mobile computed tomography (CT) and magnetic resonance imaging (MRI) at new CBOC + community	Mobile CT and MRI at new CBOC + community	Mobile CT and MRI at CBOC (Building 12) + community	Mobile CT and MRI at new CBOC + community	Hot Springs VAMC: • Diagnostic radiology • Ultrasound (24/7) • Echocardiogram (24/7) • CT (24/7)	Hot Springs VAMC
Community living center (nursing home)	Community	Community	Community	Community	Hot Springs VAMC: 15 beds	Hot Springs VAMC (7 beds)

Table 2-1. Health Services by Location Associated with the EIS Alternatives[1] (continued).

Service	Source					
	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
RRTP	None in Hot Springs area	New 100-bed RRTP	100-bed RRTP in existing domiciliary	New 24-bed RRTP	Hot Springs domiciliary: • 200 beds, including substance abuse (40), after care treatment (40), compensated work therapy (CWT) (32), care management (50), post-traumatic stress disorder (PTSD) (30) • Integrated family counseling and onsite temporary accommodations for families who wish to participate in family therapy • Legal and benefits counseling would be provided • Virtual learning center, learning support, virtual and onsite classes, library	Hot Springs domiciliary (100 beds)
Rapid City Area						
Primary care	New MSOC	New MSOC	New MSOC	New MSOC	Existing CBOC	Existing CBOC
Specialty care	Expanded at new MSOC	Expanded at new MSOC	Expanded at new MSOC	Expanded at new MSOC	Limited at existing CBOC	Limited at existing CBOC
Mental health	New MSOC	New MSOC	New MSOC	New MSOC	Existing CBOC	Existing CBOC
Pharmacy	New MSOC	New MSOC	New MSOC	New MSOC	None	None
Laboratory	New MSOC	New MSOC	New MSOC	New MSOC	Samples drawn at CBOC and sent to lab at Fort Meade	Samples drawn at CBOC and sent to lab at Fort Meade
X-ray	New MSOC	New MSOC	New MSOC	New MSOC	None	None
RRTP	New 100-bed RRTP	None in Rapid City area	None in Rapid City area	New 76-bed RRTP	None	None

[1] Supplemental Alternative G is not included in this table as it is not associated with reconfigured VA BHHCS health care services, but instead represents options for re-use of the current Hot Springs VAMC.

Table 2-2. Improved Geographic Access with VA BHHCS Services Reconfiguration Proposal.

Type of Care	Drive Time (minutes) Guideline for Level of Rurality [a]	Percent of Enrollees Meeting Guideline		
		Threshold for Acceptable Level of Access [b]	Current VA BHHCS [c]	With Services Reconfiguration [d]
Primary	30 – urban 30 – rural 60 – highly rural	70%	87%	88%
Acute hospital	60 – urban 90 – rural 120 – highly rural	65%	65%	99%
Tertiary	240 – urban 240 – rural Community standard–highly rural	65%	13%	100%

[a] Urban = urbanized area or urban cluster with core census block groups or blocks that have a population density of at least 1,000 people per square mile and surrounding census blocks that have an overall density of at least 500 people per square mile. Rural = outside of urbanized area or urban cluster. Highly rural = 1 to 6 people per square mile (VA 2015).
[b] VA 2005.
[c] VA 2013a.
[d] Alternatives A through D include additional purchased care from 3 tertiary care facilities and 26 secondary care (including acute hospital) facilities.

The specific mechanisms by which VA covers the costs of a community provider's care may change over time, but include the nationwide Veterans Choice Program (www.va.gov/opa/choiceact/) and the VA BHHCS's current purchased care program for providing referrals or authorizations for service from non-VA community providers (billed to VA), which would be expanded by the services reconfiguration proposal.

In addition to obtaining services from the new Hot Springs and Rapid City VA facilities and community providers, Veterans may seek care from other VA locations (such as Rapid City or Fort Meade), receive prescriptions from a VA pharmacy by mail, and, for some health conditions, continue to take advantage of "telehealth." Telehealth uses a telecommunications link for real-time interaction between the patient and provider, or two providers. A patient can participate from a local VA health care facility, or in some cases from home, in a consultation or examination with a remote VA medical professional using closed-circuit television and devices that measure and transmit medical data.

The EIS scoping process did not yield new action alternatives that were defined sufficiently for meaningful analysis, so the placeholder for an unidentified alternative was deleted. The first five action alternatives are now labeled as A though E, the no action alternative is labeled as F, and the supplemental alternative is labeled as G. Commenters did offer specific suggestions for re-use of part or all of the campus by non-VA entities; these are captured within Supplemental Alternative G, which is described in Section 2.3.8.

2.2 Alternatives Overview

Figure 2-1 illustrates the major components of the six stand-alone alternatives evaluated in detail in this EIS. Supplemental Alternative G could be implemented in conjunction with Alternative A, B, C, or D.

Location	Alternatives*					
	A	B	C	D	E	F No Action
Hot Springs	CBOC New Location in Hot Springs ~~Existing VA Campus~~	CBOC New Location in Hot Springs RRTP 100 beds New Location in Hot Springs ~~Existing VA Campus~~	CBOC Building 12 Renovation RRTP–100 beds Domiciliary Renovation	CBOC New Location in Hot Springs RRTP 24 beds New Location in Hot Springs ~~Existing VA Campus~~	Renovate Building 12 for expanded inpatient and CLC services RRTP–200 beds Domiciliary Renovation Other Upgrades / Renovations New programs & services	(No Change) Continued VA healthcare services from existing campus RRTP 100 beds Upgrades / Renovations Maintenance and clinical standards
Rapid City	MSOC RRTP 100 beds	MSOC	MSOC	MSOC RRTP 76 beds	CBOC (No Change)	CBOC (No Change)

*Scoping did not yield new action alternatives. "No Action," (previously "H") was re-labeled "F", which had been a placeholder.
**Alternative G: future re-use by others of all/part of Hot Springs VA campus; supplement to Alternatives A–D. Would include "Medical Miracle" proposal.

CBOC = Community Based Outpatient Clinic
CLC = community living center (nursing home)
MSOC = Multi Specialty Outpatient Clinic
RRTP = Residential Rehabilitation Treatment Program

Figure 2-1. Alternatives.

There are three important aspects of this set of alternatives:

- Alternatives A through D involve an expanded presence in the Rapid City area while maintaining locations in the Hot Springs area. There was a common misconception during scoping, also appearing in subsequent editorials and social media posts, that expansion in the Rapid City area meant that all services in the Hot Springs area would be discontinued. VA has clearly stated, and reiterates in this EIS, that **continuation of outpatient primary care services in the Hot Springs area (either at the current location or a new facility) is and always has been part of every alternative**.
- For the alternatives that include a new facility in the Hot Springs area or Rapid City area (A through D), **VA BHHCS has not yet identified any specific site on which to construct a new building or lease space for a new facility**. VA would follow departmental facility specifications, standards, and guidelines in any site selection, planning, design, and construction for a new CBOC, MSOC, or RRTP. These requirements include

those that are available online for public access from the Technical Information Library of VA's Office of Construction & Facilities Management (CFM) (www.cfm.va.gov/til/). The general parameters of proposed new facilities are outlined under the alternatives descriptions that follow. If the characteristics of the proposed site(s) for a new facility in either Hot Springs or Rapid City could be associated with potential environmental impacts not evaluated in this EIS, additional NEPA review would be undertaken.

- **It is not within the scope of this EIS to determine the specific health care services that VA offers to Veterans at any location.** Although decisions about health care services are not subject to NEPA review, decisions regarding appropriate physical buildings and infrastructure required to provide these services are the focus of this EIS and the NEPA process. Section 1.3 fully discusses this point.

Figure 3.3-12, in Section 3.3, provides a facility map of VA's Hot Springs campus that can be referenced when specific buildings are discussed.

2.3 Description of Alternatives

The following sections describe Alternatives A through F and Supplemental Alternative G, which were summarized in Figure 2-1.

2.3.1 Alternative A – Hot Springs CBOC, Rapid City MSOC and RRTP

Under Alternative A, VA BHHCS would build or lease a CBOC in the Hot Springs area, build or lease an MSOC and 100-bed RRTP in the Rapid City area, and cease providing services from the existing Hot Springs campus and Rapid City CBOC. The subsections that follow address the physical facilities, employment, estimated cost, and timeline for Alternative A.

2.3.1.1 Facilities

2.3.1.1.1 New Facilities

Hot Springs CBOC

VA would construct or lease a building in the Hot Springs area to serve as a CBOC. The CBOC is estimated to require approximately five acres, with 16,711 square feet of building space and 100 parking spaces. The actual concept or design for the proposed Hot Springs CBOC is unknown, but Figure 2-2 illustrates modern CBOCs of similar size based on VA's current design guidelines and approaches. CFM provides detailed and extensive guidelines for all VA construction projects, which are available online at www.cfm.va.gov/til/index.asp. VA has not identified a specific location for the proposed Hot Springs CBOC, although it would be expected to be within or near the city limits of Hot Springs.

Figure 2-2. New VA Outpatient Clinics Similar in Size to Proposed Hot Springs CBOC.

The proposed Hot Springs CBOC would either be constructed under contract to VA on land purchased by VA, or an existing building modified or new building constructed ("build to suit" arrangement) according to VA specifications by a developer who would enter into a long-term lease with VA. VA has not identified a specific location for the proposed Hot Springs CBOC, although it is expected to be within or near the city limits of Hot Springs.

Site selection criteria would include existing natural and built site features and improvements, public transportation access, location outside of a 100-year floodplain, availability of the property, cost of the property, and other factors identified in VA's "Site Development Design Manual" (VA 2013b). VA would also comply with its "Strategic Sustainability Performance Plan" (VA 2014), and would consider the "Recommendations on Sustainable Siting for Federal Facilities" (DOT et al. 2010). Site selection also considers a location's potential to achieve integration of the proposed facility into the surrounding environment, blending existing conditions and future facility requirements (low-impact development). The proposed facility's "fit" within the existing property lines would be assessed, along with which orientation would provide the best energy reduction opportunities.

Rapid City MSOC and RRTP

VA would construct or lease buildings in the Rapid City area, at a single location, to serve as an MSOC and RRTP. The co-located Rapid City MSOC and RRTP would require an estimated 132,942- to 144,956-square-foot facility with 620 parking spaces on approximately 14 to 17 acres.

The actual concept or design for the proposed Rapid City MSOC is unknown, but Figure 2-3 provides examples of modern VA outpatient clinics of similar size based on VA's current design guidelines and approaches.

Figure 2-3. New VA Outpatient Clinics Similar in Size to Proposed Rapid City MSOC.

The actual concept or design for the proposed Rapid City RRTP is unknown, but Figure 2-4 illustrates a modern RRTP based on VA's current design guidelines and approaches. It is likely to be a single- and multi-story apartment and townhouse setting, similar to the facility shown in Figure 2-4. The Veterans' residences would consist of patient care units, each with single and double rooms for up to four residents with shared living, kitchen, laundry, and bathroom space. The Rapid City RRTP would have a sweat lodge in a secluded location; a central patient dining area; and a common area for therapy, education, training, recreation, conference, and administration.

Figure 2-4. Example of Modern RRTP Layout

The proposed Rapid City MSOC and RRTP would either be constructed under contract to VA on land purchased by VA, or an existing building modified or new building constructed ("build to suit" arrangement) according to VA specifications by a developer who would enter into a long-term lease with VA.

VA has not identified a specific location for the proposed Rapid City MSOC and RRTP, although it would be expected to be within or near the city limits of Rapid City. General site selection criteria would be the same as those described above in the subsection *Hot Springs CBOC*.

2.3.1.1.2 Vacated Facilities

Under Alternative A, VA BHHCS would no longer offer health care services from the existing Hot Springs campus or the existing Rapid City CBOC.

VA would consider various options for the Hot Springs campus, most of which is a National Historic Landmark. Under Supplemental Alternative G, Re-Use by Others, VA would evaluate proposals from other entities for new use(s) of the Hot Springs campus (see Section 2.3.8). VA would continue to maintain the property until a re-use of the campus is identified and approved. If necessary, VA would secure and maintain the property following the National Park Service's guidance for mothballing historic buildings, which "involves controlling the long-term deterioration of the building while it is unoccupied as well as finding methods to protect it from sudden loss by fire or vandalism. This requires securing the building from unwanted entry, providing adequate ventilation to the interior, and shutting down or modifying existing utilities" (NPS 1993).

The existing Rapid City CBOC is a leased facility from which the VA could re-locate with no future actions required of the VA.

2.3.1.2 Employment

Under Alternative A, VA BHHCS would gradually reduce the number of employees in Hot Springs from the current level, which is 357 full-time equivalent employees (FTEEs), and increase the number of employees in Rapid City, which is currently 30 FTEEs:

> One ***full-time equivalent employee***, or ***FTEE***, represents either one full-time employee working 40 hours per week, or two or more part-time employees whose combined working hours total to 40 hours per week.

- Approximately 67 FTEEs would staff the proposed Hot Springs CBOC and maintain the vacated campus, a decrease of 290 FTEEs in Hot Springs.
- Approximately 128 FTEEs would staff the proposed Rapid City area MSOC and RRTP, an increase of 98 FTEEs in Rapid City.
- The remaining Hot Springs FTEEs not transitioned to Rapid City would decrease through eligible retirements, early retirements, buy-outs, and voluntary separations. No VA employees would lose VA employment, although they may need to fill a different job, with retraining as needed.

2.3.1.3 Estimated Cost

The estimated costs for Alternative A are summarized in Table 2-3. These costs were estimated by Jones Lang LaSalle (2012a) and included real property and operational costs, using the methodology described as follows:

a. Isolate the cost components for each alternative (based on facility needs and acquisition method).
b. Estimate 30-year life cycle costs of non-recurring (that is, capital investment) and facility recurring costs (that is, lease payments and operating costs). The 30-year life cycle cost represents the present value of recurring and non-recurring cash flows between 2013 and 2043. Data sources included:
    i. VA resources such as CFM's Facility Condition Assessment and Capital Resource Survey
    ii. Adjusted CFM renovation cost estimates based on recommendations from a historic architect (Treanor 2012).
    iii. Private sector resources such as Building Owners and Managers Association, Co-Star Realty Information, Inc., and RSMeans (construction cost data supplier).
c. Aggregate 30-year life cycle costs of the cost components within each alternative.

Table 2-3. Estimated Cost for Alternative A.

Build / Lease Options	Estimated 30-Year Life Cycle Cost
Build both Hot Springs CBOC and co-located Rapid City MSOC/RRTP	$148,622,461
Lease Hot Springs CBOC and build co-located Rapid City MSOC/RRTP	$149,358,949
Build Hot Springs CBOC and lease co-located Rapid City MSOC/RRTP	$152,285,341
Lease both Hot Springs CBOC and co-located Rapid City MSOC/RRTP	$153,021,829

Source: Jones Lang LaSalle 2012a.

2.3.1.4 Timeline

Alternative A would be implemented over a five-year timeline beginning at some point after publishing the Record of Decision for this EIS and based on available funding, as summarized in Table 2-4.

Table 2-4. Implementation Timeline for Alternative A.

Location		Services at VA Facilities			
		Current	**Years 1–2**	**Years 2–4**	**Year 5**
Hot Springs	VAMC	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Dialysis ▪ Lab ▪ Pharmacy ▪ Imaging ▪ Urgent care ▪ Basic outpatient surgery Inpatient ▪ Hospital ▪ Nursing home RRTP Call center	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Dialysis ▪ Lab ▪ Pharmacy ▪ Imaging RRTP Call center	—	—
	CBOC	—	—	Outpatient [a] ▪ Primary care ▪ Limited lab services ▪ Mental health ▪ Expanded specialty care ▪ Dialysis ▪ Imaging ▪ Call center	Outpatient [a] ▪ Primary care ▪ Limited lab services ▪ Mental health ▪ Expanded specialty care ▪ Dialysis ▪ Imaging ▪ Call center
Rapid City	CBOC	▪ Primary care ▪ Limited specialty care ▪ Mental health	▪ Primary care ▪ Limited specialty care ▪ Mental health	—	—
	MSOC	—	—	Outpatient ▪ Primary care ▪ Expanded specialty care ▪ Mental health ▪ Pharmacy ▪ Laboratory ▪ Imaging	Outpatient ▪ Primary care ▪ Expanded specialty care ▪ Mental health ▪ Pharmacy ▪ Laboratory ▪ Imaging
	RRTP	—	—	RRTP	RRTP

[a] Veterans could also receive purchased care for inpatient, laboratory, pharmacy, urgent care, surgery, additional specialty care and medical imaging, and nursing home services from community providers in Hot Springs and communities closer to Veterans' homes.

2.3.2 Alternative B — Hot Springs CBOC and RRTP, Rapid City MSOC

Under Alternative B, VA BHHCS would build or lease a CBOC and 100-bed RRTP in the Hot Springs area, build or lease an MSOC in the Rapid City area, and cease providing services from the existing Hot Springs campus and Rapid City CBOC. The subsections that follow address the physical facilities, employment, estimated cost, and timeline for Alternative B. The reader is referred back to Alternative A for details of elements that are identical within the two alternatives.

2.3.2.1 Facilities

2.3.2.1.1 New Facilities

Hot Springs CBOC and RRTP

VA would construct or lease buildings in the Hot Springs area to serve as a new CBOC and 100-bed RRTP. The co-located CBOC and RRTP would require an estimated 102,571-square-foot facility with 300 parking spaces on approximately 15 acres.

All details for the CBOC are the same as those described for Alternative A in Section 2.3.1.1.1, in the subsection *Hot Springs CBOC*.

The actual concept or design for a Hot Springs RRTP is unknown, but Figure 2-4 (in Section 2.3.1.1.1 for Alternative A) illustrates a modern RRTP based on VA's current design guidelines and approaches. It is likely to be a single- and multi-story apartment and townhouse setting, similar to the facility shown in Figure 2-4. The Veterans' residences would consist of patient care units, each with single and double rooms for up to four residents with shared living, kitchen, laundry, and bathroom space. The Hot Springs RRTP would have a sweat lodge in a secluded location; a central patient dining area; and a common area for therapy, education, training, recreation, conference, and administration. Constructing or leasing an RRTP in the Hot Springs area would require VA to also build or lease a firehouse to protect life and property.

VA has not identified a specific location for a Hot Springs CBOC and RRTP, although it would be expected to be within or near the city limits of Hot Springs. The facilities would either be constructed under contract to VA on land purchased by VA, or existing buildings modified or new buildings constructed ("build to suit" arrangement) according to VA specifications by a developer who would enter into a long-term lease with VA.

Rapid City MSOC

VA would construct or lease a building in the Rapid City area to serve as an MSOC. The MSOC is estimated to require approximately 10 acres, with 66,281 square feet of building space and 400 parking spaces. The actual concept or design for the proposed Rapid City MSOC is unknown, but Figure 2-3 in Section 2.3.1.1.1 provides examples of modern VA outpatient clinics of similar size based on VA's current design guidelines and approaches.

The MSOC would either be constructed under contract to VA on land purchased by VA, or an existing building modified or new building constructed ("build to suit" arrangement) according to VA specifications by a developer who would enter into a long-term lease with VA.

VA has not identified a specific location for a Rapid City MSOC, although it would be expected to be within or near the city limits of Rapid City. General site selection criteria would be the same as those described in Section 2.3.1.1.1, in the subsection *Hot Springs CBOC*.

2.3.2.1.2 Vacated Facilities

Under Alternative B, VA BHHCS would no longer offer health care services from the existing Hot Springs campus or Rapid City CBOC. Vacated facilities would be handled the same way as discussed for vacated facilities under Alternative A.

2.3.2.2 Employment

Under Alternative B, VA BHHCS would gradually reduce the number of employees in Hot Springs from the current level, which is 357 FTEEs, and increase the number of employees in Rapid City, which is currently 30 FTEEs:

- Approximately 139 FTEEs would staff the proposed Hot Springs CBOC and RRTP and maintain the vacated campus, a decrease of 218 FTEEs in Hot Springs.
- Approximately 56 FTEEs would staff the proposed MSOC in Rapid City, an increase of 26 FTEEs in Rapid City.
- The remaining Hot Springs FTEEs would decrease gradually through early retirements, buy-outs, and voluntary separations. No VA employees would lose VA employment, although they may need to fill a different job, with retraining as needed.

2.3.2.3 Estimated Cost

The estimated costs for Alternative B, using the same methodology and data sources described in Section 2.3.1.3, are summarized in Table 2-5.

Table 2-5. Estimated Costs for Alternative B

Build / Lease Options	Estimated 30-Year Life Cycle Cost
Build Hot Springs CBOC, RRTP, and firehouse; and Rapid City MSOC	$168,234,767
Lease Hot Springs CBOC, RRTP, and firehouse; and Rapid City MSOC	$170,713,726

Source: Jones Lang LaSalle 2012a.

2.3.2.4 Timeline

Alternative B would be implemented over a five-year timeline beginning at some point after publishing the Record of Decision for this EIS and based on available funding, as summarized in Table 2-6.

Table 2-6. Implementation Timeline for Alternative B.

Location		Services at VA Facilities			
		Current	**Years 1–2**	**Years 2–4**	**Year 5**
Hot Springs	VAMC	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Basic outpatient surgery ▪ Dialysis ▪ Lab ▪ Pharmacy ▪ Imaging ▪ Urgent care Inpatient ▪ Hospital ▪ Nursing home RRTP Call center	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Dialysis ▪ Lab ▪ Pharmacy ▪ Imaging RRTP Call center	—	—
	CBOC	—	—	Outpatient [a] ▪ Primary care ▪ Limited lab services ▪ Mental health ▪ Expanded specialty care ▪ Dialysis ▪ Imaging ▪ Call center	Outpatient [a] ▪ Primary care ▪ Limited lab services ▪ Mental health ▪ Expanded specialty care ▪ Dialysis ▪ Imaging ▪ Call center
	RRTP	—	—	RRTP	RRTP
Rapid City	CBOC	▪ Primary care ▪ Limited specialty care ▪ Mental health	▪ Primary care ▪ Limited specialty care ▪ Mental health	—	—
	MSOC	—	—	Outpatient ▪ Primary care ▪ Expanded specialty care ▪ Mental health ▪ Pharmacy ▪ Laboratory ▪ Imaging	Outpatient ▪ Primary care ▪ Expanded specialty care ▪ Mental health ▪ Pharmacy ▪ Laboratory ▪ Imaging

[a] Veterans could also receive purchased care for inpatient, laboratory, pharmacy, urgent care, surgery, additional specialty care and medical imaging, and nursing home services from community providers in Hot Springs and communities closer to Veterans' homes.

2.3.3 Alternative C — Hot Springs Renovation, Rapid City MSOC

Under Alternative C, VA BHHCS would renovate Building 12 at the existing Hot Springs campus as the location for a CBOC, renovate the Hot Springs domiciliary to be a 100-bed RRTP, and build or lease an MSOC in the Rapid City area. The subsections that follow address the physical facilities, employment, estimated cost, and timeline for Alternative C. The reader is referred back to Alternative A for details of elements that are identical within the two alternatives.

2.3.2.1 Facilities

2.3.3.1.1 Renovated and New Facilities

Hot Springs CBOC

VA would renovate the existing hospital building (Building 12) for use as a CBOC on the Hot Springs campus. The boiler plant (Building 18), high voltage switchgear building (Building 64), and information resources management building (Building 65) would also be renovated and remain in use. The CBOC is estimated to require 45,841 square feet within the 134,918-square-foot building.

Hot Springs RRTP

VA would renovate the administration building (Building 1), dining services (Building 2), patient wards (Buildings 3 through 8), the auditorium/call center (Building 11), one duplex quarters (Building 29), and the fire/security facility (Building 66) to serve as and support a 100-bed RRTP on the Hot Springs campus. As described above for a CBOC located on the campus, the boiler plant (Building 18), high voltage switchgear building (Building 64), and information resources management building (Building 65) would also be renovated and remain in use, supporting the CBOC and the RRTP.

The existing space in the patient wards can accommodate 110 beds while adhering closely to the desired recovery model of care. The patient care unit would be single and double rooms of 8 to 16 beds with shared bathroom space. Accessibility standards could be met by modifications, which would require a significant amount of evaluation and study to ensure major character-defining features of the historical property are not destroyed in the process.

Rapid City MSOC

VA would construct or lease a building in the Rapid City area to serve as an MSOC; all details are the same as those described for Alternative B in Section 2.3.2.1.1, in the subsection *Rapid City MSOC*. VA has not identified a specific location for the MSOC, although it would be expected to be within or near the city limits of Rapid City.

2.3.3.1.2 Vacated Facilities

Under Alternative C, VA BHHCS would not have use for some portions of the hospital building (Building 12) and would therefore close areas of the building. This alternative would close the two existing chapels (Buildings 9 and 10), which are attached to Building 2, and all other buildings not listed above as being used for the CBOC, RRTP, or their supporting functions. VA BHHCS would no longer offer health care services from the existing Rapid City CBOC. Vacated facilities would be handled the same way as discussed for vacated facilities under Alternative A.

2.3.3.2 Employment

Under Alternative C, VA BHHCS would gradually reduce the number of employees in Hot Springs from the current level, which is 357 FTEEs, and increase the number of employees in the Rapid City area, which is currently 30 FTEEs:

- Approximately 139 FTEEs would staff the proposed Hot Springs CBOC and RRTP and maintain the vacated campus, a decrease of 218 FTEEs in Hot Springs.
- Approximately 56 FTEEs would staff the proposed MSOC in Rapid City, an increase of 26 FTEEs in Rapid City.
- The remaining Hot Springs FTEEs would decrease gradually through early retirements, buy-outs, and voluntary separations. No VA employees would lose VA employment, although they may need to fill a different job, with retraining as needed.

2.3.3.3 Estimated Cost

The estimated costs for Alternative C are summarized in Table 2-7, using the same methodology and data sources described in Section 2.3.1.3.

Table 2-7. Estimated Costs for Alternative C

Build / Lease Options	Estimated 30-Year Life Cycle Cost
Renovate for Hot Springs CBOC in Building 12, Hot Springs RRTP in existing domiciliary; build Rapid City MSOC	$229,838,861
Renovate for Hot Springs CBOC in Building 12, Hot Springs RRTP in existing domiciliary; lease Rapid City MSOC	$230,391,843

Source: Jones Lang LaSalle 2012a.

2.3.3.4 Timeline

Alternative C would be implemented over a five-year timeline beginning at some point after publishing the Record of Decision for this EIS and based on available funding, as summarized in Table 2-8.

Table 2-8. Implementation Timeline for Alternative C

Location		Services at VA Facilities			
		Current	**Years 1–2**	**Years 2–4**	**Year 5**
Hot Springs	VAMC, transitioning to be a CBOC and RRTP	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Basic outpatient surgery ▪ Dialysis ▪ Lab ▪ Pharmacy ▪ Imaging ▪ Urgent care Inpatient ▪ Hospital ▪ Nursing home RRTP Call center	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Dialysis ▪ Lab ▪ Pharmacy ▪ Imaging RRTP Call center	Outpatient [a] ▪ Primary care ▪ Limited lab services ▪ Mental health ▪ Expanded specialty care ▪ Dialysis ▪ Imaging RRTP Call center	Outpatient [a] ▪ Primary care ▪ Limited lab services ▪ Mental health ▪ Expanded specialty care ▪ Dialysis ▪ Imaging RRTP Call center
Rapid City	CBOC	▪ Primary care ▪ Limited specialty care ▪ Mental health	▪ Primary care ▪ Limited specialty care ▪ Mental health	—	—
	MSOC	—	—	Outpatient ▪ Primary care ▪ Expanded specialty care ▪ Mental health ▪ Pharmacy ▪ Laboratory ▪ Imaging	Outpatient ▪ Primary care ▪ Expanded specialty care ▪ Mental health ▪ Pharmacy ▪ Laboratory ▪ Imaging

[a] Veterans could also receive purchased care for inpatient, laboratory, pharmacy, urgent care, surgery, additional specialty care and medical imaging, and nursing home services from community providers in Hot Springs and communities closer to Veterans' homes.

2.3.4 Alternative D — Hot Springs CBOC and RRTP, Rapid City MSOC and RRTP

Under Alternative D, VA BHHCS would build or lease a CBOC and 24-bed RRTP in the Hot Springs area, build or lease an MSOC and 76-bed RRTP in the Rapid City area, and cease providing services from the existing Hot Springs campus and Rapid City CBOC. The subsections that follow address the physical facilities, employment, estimated cost, and timeline for Alternative D. The reader is referred back to Alternative A for details of elements that are identical within the two alternatives.

2.3.4.1 Facilities

2.3.4.1.1 New Facilities

Hot Springs CBOC and RRTP

VA would construct or lease buildings in the Hot Springs area to serve as a CBOC and 24-bed RRTP. For the CBOC, details are expected to be similar to those described for Alternative A in Section 2.3.1.1.1, in the subsection *Hot Springs CBOC*. With the exception of a smaller size, the RRTP design details and patient care units are the same as those described for Alternative B in Section 2.3.2.1.1, in the subsection *Hot Springs RRTP*, including the requirement that VA would also build or lease a firehouse to protect life and property. If the CBOC and RRTP are co-located, the total space requirements would range from 44,830 to 95,386 square feet, including the fire station, on approximately 11 to 13 acres.

Rapid City MSOC and RRTP

VA would construct or lease buildings in the Rapid City area, at a single location, to serve as an MSOC and 76-bed RRTP; construction details and overall space and land requirements would be generally similar to those described for Alternative A in Section 2.3.1.1.1, in the subsection *Rapid City MSOC and RRTP*.

2.3.4.1.2 Vacated Facilities

Under Alternative D, VA BHHCS would no longer offer health care services from the existing Hot Springs campus or Rapid City CBOC. Vacated facilities would be handled the same way as discussed for vacated facilities under Alternative A.

2.3.4.2 Employment

Under Alternative D, VA BHHCS would gradually reduce the number of employees in Hot Springs from the current level, which is 357 FTEEs, and increase the number of employees in Rapid City, which is currently 30 FTEEs:

- Approximately 87 FTEEs would staff the proposed Hot Springs CBOC and RRTP and maintain the vacated campus, a decrease of 270 FTEEs in Hot Springs.
- Approximately 118 FTEEs would staff the proposed MSOC and RRTP in Rapid City, an increase of 88 FTEEs in Rapid City.

- The remaining Hot Springs FTEEs would decrease gradually through early retirements, buy-outs, and voluntary separations. No VA employees would lose VA employment, although they may need to fill a different job, with retraining as needed.

2.3.4.3 Estimated Cost

The estimated costs for Alternative D, using the same methodology and data sources described in Section 2.3.1.3, are summarized in Table 2-9.

Table 2-9. Estimated Costs for Alternative D

Build / Lease Options	Estimated 30-Year Life Cycle Cost
Build Hot Springs CBOC and RRTP and firehouse, and Rapid City MSOC and RRTP	$176,040,980
Lease Hot Springs CBOC and RRTP and firehouse, and Rapid City MSOC and RRTP	$182,387,084

Source: Jones Lang LaSalle 2012a.

2.3.4.4 Timeline

Alternative D would be implemented over a five-year timeline beginning at some point after publishing the Record of Decision for this EIS and based on available funding, as summarized in Table 2-10.

Table 2-10. Implementation Timeline for Alternative D

Location		Services at VA Facilities			
		Current	**Years 1–2**	**Years 2–4**	**Year 5**
Hot Springs	VAMC	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Basic outpatient surgery ▪ Dialysis ▪ Lab ▪ Pharmacy ▪ Imaging ▪ Urgent care Inpatient ▪ Hospital ▪ Nursing home RRTP Call center	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Dialysis ▪ Lab ▪ Pharmacy ▪ Imaging RRTP Call center	—	—
	CBOC	—	—	Outpatient [a] ▪ Primary care ▪ Limited lab services ▪ Mental health ▪ Expanded specialty care ▪ Dialysis ▪ Imaging ▪ Call center	Outpatient [a] ▪ Primary care ▪ Limited lab services ▪ Mental health ▪ Expanded specialty care ▪ Dialysis ▪ Imaging ▪ Call center
	RRTP	—	—	RRTP	RRTP
Rapid City	CBOC	▪ Primary care ▪ Limited specialty care ▪ Mental health	▪ Primary care ▪ Limited specialty care ▪ Mental health	—	—
	MSOC	—	—	Outpatient ▪ Primary care ▪ Expanded specialty care ▪ Mental health ▪ Pharmacy ▪ Laboratory ▪ Imaging	Outpatient ▪ Primary care ▪ Expanded specialty care ▪ Mental health ▪ Pharmacy ▪ Laboratory ▪ Imaging
	RRTP	—	—	RRTP	RRTP

[a] Veterans could also receive purchased care for inpatient, laboratory, pharmacy, urgent care, surgery, additional specialty care and medical imaging, and nursing home services from community providers in Hot Springs and communities closer to Veterans' homes.

2.3.5 Alternative E — Save the VA Proposal

The Save the VA proposal was prepared by a coalition from the Hot Springs community and is provided in its entirety in Appendix B to this EIS. The proposal includes elements that would be implemented by VA BHHCS, a nonprofit organization (Hot Springs Community Partnership Corporation), a for-profit company (Veterans Industries), regional higher education providers, major medical research facilities, the City of Hot Springs, and Fall River County. Its key features are continuing and expanded health care services at the Hot Springs VAMC, implementing a national demonstration project focusing on treatment and clinical research for PTSD in an expanded Hot Springs domiciliary, and VA partnership with the local community in a CWT program in Hot Springs. The following sections summarize the features of this proposal that would occur at VA facilities or be implemented by VA BHHCS. The full proposal (Appendix B) describes all features of the project.

In addition to the changes to facilities as described below, the Save the VA proposal includes other VA actions and participation. The nonprofit Hot Springs Community Partnership Corporation would establish a joint services agreement with VA for CWT services, managing revenue returns to VA, and other purposes, as necessary:

- Compensated work therapy: The Corporation's for-profit subsidiary, Veterans Industries, would function as the CWT location for Hot Springs RRTP residents. A related incentive work therapy program, also through Veterans Industries, would provide part-time work for Veterans in after care treatment in the RRTP to slowly adjust to the demands of a work schedule.
- Revenue returns: Seventy-five percent of the profits from the Corporation's for-profit subsidiary, Veterans Industries, would go to VA for patient and treatment costs of Veterans at the Hot Springs RRTP.

VA would participate in a joint evaluation team to biennially assess the progress of the Corporation and its for-profit subsidiary against performance benchmarks to be established by the Corporation's Board of Directors. VA would also cooperate with the Corporation and other appropriate stakeholders in activities such as white papers, materials, seminars, and other appropriate support for an interested national audience.

The Hot Springs VAMC would work with VA medical researchers and those from major medical research facilities to provide and conduct (with informed consent) research into treatment effectiveness and into regional and local issues that may not affect veterans in urban settings. Should the project be a success, VA could determine after 10 years if the Hot Springs facility is adequate for a Center of Excellence designation. Research could also be conducted on traditional Native American healing activities, including sweat lodges and mineral water therapy; this could also encourage currently untreated Native American veterans in the catchment area to enroll in the Hot Springs treatment programs. Special research attention would be given to the integration of Veterans Industries into treatment components.

Although the Save the VA proposal did not include specific provisions for purchased care, services from community providers would remain available through the nationwide Veterans Choice Program (www.va.gov/opa/choiceact/).

2.3.5.1 Facilities

Hot Springs VAMC

Internal and external renovations would be made to buildings on campus to meet VA inpatient and accessibility standards. Renovations to the hospital (Building 12) would accommodate an increase in inpatient (acute care) beds from 10 to 15, add 3 intensive care unit beds, and increase the community living center (nursing home) beds from 7 to 15.

Building spaces would be identified and renovated as necessary for medical research activities.

The standard operating and maintenance plan for the Hot Springs campus would continue to be determined and directed by VA staff. The Save the VA proposal states that the private company Veterans Industries would facilitate certification of CWT patients in historic preservation practices, following which Veterans Industries employees would conduct renovations and upgrades. VA's financial analysis of the Save the VA proposal accounted for the timing of VA's investment for required initial facility renovations occurring before CWT patients are trained for complex renovations.

Table 2-11 summarizes the Alternative E renovations to the VA Hot Springs hospital (Building 12) and other campus buildings included in Alternative E; renovations to the domiciliary are addressed in the next section.

Table 2-11. Hot Springs Hospital and Campus Construction/Renovations, Alternative E

Building/Location	Construction / Renovation
Boiler plant	Green standard upgrades to update four boilers for dual source fuel to add liquid natural gas.
Near boiler plant	Build new storage facility by the boiler plant.
Not specified	Save the VA proposed renovating unspecified existing buildings or rooms to create four 600-square-foot classrooms. However, VA did not identify an available existing location on campus; thus, the cost estimate includes a new facility that would house the classrooms and also provide space for other support functions listed in the proposal (as well as RRTP beds; see Table 2-12).
Hospital (Building 12)	Add second floor to east wing addition for surgery suites and updated air handling and storage areas.
Hospital (Building 12)	Renovate the old surgery area for recovery rooms and the west end for specialty clinics.
Hospital (Building 12)	Convert south wings to 15-bed inpatient ward.
Hospital (Building 12)	Convert north wing to allow for more specialty clinic space.
Hospital (Building 12)	Renovate ward 1-East for continued inpatient care.
Director's quarters (Building 23)	Renovate to become the headquarters for the National Archives. The lower level could be turned into the museum and visitor center. The upper levels could be turned into offices.
Near Building 23	Add a building that has museum-quality heat and light controlled areas for preservation of special documents and historical items if needed.

Hot Springs RRTP

Renovations would be made to accommodate 200 residents, create additional RRTP living spaces, and meet existing code, *Architectural Barriers Act* requirements, and VA residential standards. Some facilities would require adjustments to existing ramps to achieve 100 percent accessibility. Updates such as tunnels, bridges, or elevators would also contribute to meeting accessibility standards. The RRTP would be renovated to provide private or semi-private rooms with closer bathrooms for residents. Historic preservation standards would be followed during renovations.

The Save the VA proposal specified that the existing domiciliary would be renovated to accommodate 200 residents. However, VA's analysis (Jones Lang LaSalle 2012b) concluded that an additional RRTP facility would also need to be constructed onsite to accommodate the additional beds and services included in the proposal that cannot fit in the existing facility. Based on VA Space Planning Criteria, the existing space in the patient wards can accommodate 110 beds while adhering closely to the desired recovery model of care, as described for Alternative C. The patient care unit would be single and double rooms of 8 to 16 beds with shared bathroom space. A new facility must be constructed to house the additional beds, classrooms, support functions, and all other RRTP services included in the proposal.

Save the VA proposed that an educational facility would be created with sufficient classroom space to accommodate at least four simultaneous classes for patient treatment and orientation, as well as education and college-level classes. These classrooms would each be about 600 square feet and outfitted with tables, chairs, Smart Board, projection system, computer, screen, and a high definition monitor. The educational facility would also incorporate video conferencing, audio conferencing, and online capabilities. The nonprofit Hot Springs Community Partnership Corporation would enter into agreements with educational providers to establish outreach programs at the Hot Springs VAMC. These programs and classrooms would be available for RRTP residents, VA staff, Veterans in the catchment area, Veterans Industries employees, and community members. Although the Save the VA proposal stated that existing buildings or rooms would be modified to accommodate these educational opportunities, VA did not identify an available existing location on campus that could be modified to create these classrooms. Therefore, the cost estimate includes these classroom in a new facility that would be constructed to also provide space for other support functions listed in the proposal, as well as 82 RRTP beds (as described in next section).

Table 2-12 summarizes the VA Hot Springs domiciliary complex (Buildings 1 through 11) renovations included in Alternative E.

Table 2-12. Hot Springs Domiciliary and Related Renovations under Alternative E

Building/Location	Renovation
New construction, possibly west of Building 11, beyond parking lot, at horseshoe pits; or on the far side of the main parking lot by the Police and Fire Station and at the north end of 6th Street. Or use existing Buildings 21 or 28.	Separate family, singles with children, and female housing, all with handicap access, for a total of 40 beds capacity. The VA cost estimate (Jones Lang LaSalle 2012b) included this housing in the renovation estimate for the line item below, which would convert four current residences into multifamily housing.

Table 2-12. Hot Springs Domiciliary and Related Renovations under Alternative E

Building/Location	Renovation
Buildings 20, 21, 23, 24, 25, 26, 27, 28, 29 (four only)	Renovation of four current medical residences into apartments to house families of RRTP residents participating in integrated family counseling. Renovation of four current medical residences to serve as additional transitional residences for CWT patients. The VA cost estimate (Jones Lang LaSalle 2012b) assumed total renovation of Buildings 23, 24, 26, and 27 to convert quarters into multi-family transitional housing.
Buildings 3, 5, 6, 7, 8 (Building 4 has already been completed)	Complete remodel of B-level ramps from lower arcade to B wards.
Buildings 5, 7, 8	Install two-, three-, or four-stop elevators. The cost estimate assumed elevators would be added to all RRTP buildings instead of tunnels and bridges, since tunnels and bridges would further reduce available space, require rerouting water and sewer lines, require re-planning the building structural and physical system, and increase operating costs.
Buildings 3, 4, 6, 7	Two tunnels, between Buildings 3 and 4 and Buildings 6 and 7. VA did not include this in the cost estimate for the reasons listed above. Elevators were costed instead.
Not specified	Two bridges to allow access to upper arcade. The cost estimate assumed the bridges would be between Buildings 3 and 4 and Buildings 6 and 7. VA did not include this in the cost estimate for the reasons listed above. Elevators were costed instead.
11 wards (Wards 3B and 5B are already remodeled)	Save the VA proposes to remodel wards for single and double occupancy rooms for a total of 200 patients. However: • The Save the VA proposal states this renovation would create a 200-bed RRTP, but the proposal's enumeration of the various types of beds sums to 192. • VA has determined that Buildings 3 through 8 can be renovated to accommodate a total of 110 patients and still maintain the recovery model of care; therefore, this is the total used in the renovation cost estimate in Section 2.3.5.3. • VA also estimated the cost for constructing separate on-campus modern patient care units with 82 additional beds, to achieve the proposal's total of 192 beds.
Near Buildings 3, 4, and near new housing (see Table 2-11)	Handicap parking between Buildings 3 and 4 and where new housing is added, for a total of 40 spaces.
Building 7	Two handicap ramps for west end of street-level entrance.
Buildings 1-11	Green standard upgrades to provide better insulation and thermal windows (inside envelope).
Unspecified	New 82-bed RRTP to accommodate 192-bed capacity (total of bed types specified in proposal); estimated size = 84,110 gross square feet, assumed two acres site disturbance.

2.3.5.2 Employment

VA would employ an adequate number of qualified professional, specialty, and support staff to provide the medical and treatment services in the Save the VA proposal, as well as serve as liaison to the Veterans Industries project. Positions would be established as full-time permanent staff. Save the VA stated that VA would activate policies to encourage and enhance staff retention. Appendix D to the Save the VA proposal identified the following approaches, all of which are currently utilized by VA BHHCS: nationwide advertisement, offers of permanent employment, and enhancing attraction of positions by providing information about education debt-reduction programs and benefits. Competencies could be developed and maintained through rotation to another facility for updates/training, virtual training, and simulation training.

In Hot Springs, approximately 633 FTEEs employees would be needed to staff the VAMC, RRTP, and other services; this would be an increase of 276 FTEEs. VA BHHCS would continue to staff the Rapid City CBOC at a similar level as currently (approximately 30 FTEEs).

2.3.5.3 Estimated Cost

The estimated costs for Alternative E are summarized in Table 2-13. These costs were estimated using the same methodology and data sources described in Section 2.3.1.3. Tables 2-11 and 2-12 include notes on assumptions VA made regarding the details of construction, renovation, and space planning in order to estimate the cost of each item included in the proposal.

Table 2-13. Estimated Costs for Alternative E

Build / Lease Options	Estimated 30-Year Life Cycle Cost
Renovations and construction at Hot Springs campus, continued lease of Rapid City CBOC.	$247,036,697

Source: Jones Lang LaSalle 2012b.

2.3.5.4 Timeline

Medical facilities would be updated as necessary and all treatments and medical services would be maintained for a minimum five-year demonstration period in which to establish a new baseline of patient data. These data would be evaluated to determine recommendations related to levels of health care services. The Veterans Industries project would run for a minimum of 10 years. The Save the VA proposal states that the nonprofit Hot Springs Community Partnership Corporation would establish a joint services agreement with VA within six months. The CWT location would be operational within 18 to 24 months, and VA would begin receiving revenue returns from the Veterans Industries subsidiary in 36 to 48 months.

Alternative E would be implemented for at least a 10-year timeline beginning at some point after publishing the Record of Decision for this EIS and based on available funding, as summarized in Table 2-14.

Table 2-14. Implementation Timeline for Alternative E

Location		Services at VA Facilities			
		Current	**Years 1–2**	**Years 3–5**	**Years 5-10**
Hot Springs	VAMC	Outpatient ▪ Primary care ▪ Mental health ▪ Limited specialty care ▪ Basic outpatient surgery ▪ Dialysis ▪ Laboratory ▪ Pharmacy ▪ Imaging ▪ Urgent care Inpatient ▪ Hospital (10 beds) ▪ Nursing home (7 beds)	Outpatient ▪ Primary care ▪ Mental health ▪ Expanded specialty care ▪ Advanced outpatient surgery ▪ Dialysis ▪ Laboratory ▪ Pharmacy ▪ Imaging including ultrasound ▪ Urgent care ▪ Dental Inpatient ▪ Hospital (15 beds) ▪ Community living center (nursing home) (15 beds)	Outpatient ▪ Primary care ▪ Mental health ▪ Expanded specialty care ▪ Advanced outpatient surgery ▪ Dialysis ▪ Laboratory ▪ Pharmacy ▪ Imaging including ultrasound ▪ Urgent care ▪ Dental Inpatient ▪ Hospital (15 beds) Community living center (nursing home) (15 beds)	Outpatient ▪ Primary care ▪ Mental health ▪ Expanded specialty care ▪ Advanced outpatient surgery ▪ Dialysis ▪ Laboratory ▪ Pharmacy ▪ Imaging including ultrasound ▪ Urgent care ▪ Dental Inpatient ▪ Hospital (15 beds) ▪ Community living center (nursing home) (15 beds)
	RRTP	RRTP (100 beds)	▪ RRTP (100 beds) ▪ Planning and design for expanded RRTP ▪ RRTP construction initiated	▪ RRTP (200 beds) ▪ Family housing ▪ CWT ▪ Legal and benefits counseling	▪ RRTP (200 beds) ▪ Family housing ▪ CWT ▪ Legal and benefits counseling
	Education	—	▪ Planning and design ▪ Construction initiated	▪ Learning center	▪ Learning center
	Research	—	▪ Program plan developed	▪ Program established and in progress	▪ Program continues and data collected/analyzed
Rapid City	CBOC	No changes to existing Rapid City CBOC specified.			

2.3.6 Alternative F — No Action

2.3.6.1 Facilities

Hot Springs VAMC

VA BHHCS would continue to provide primary care, nursing home, and other health services at the existing Hot Springs VAMC. Scheduled and non-scheduled maintenance of buildings would continue, and upgrades and renovations to maintain clinical standards would be initiated as funding was available through the routine budgeting process.

Hot Springs RRTP

VA BHHCS would continue to provide RRTP services from the domiciliary on the existing Hot Springs campus. Scheduled and non-scheduled maintenance of buildings would continue, and upgrades and renovations to maintain clinical standards would be initiated as funding was available through the routine budgeting process.

Rapid City CBOC

VA BHHCS would continue to provide primary care and other health services from leased space in Rapid City. The current lease extends through January 2016, and may be renewed at that time or other space in Rapid City could be secured.

The mechanisms by which VA would cover the costs of community providers' care for Veterans may change over time, but include the nationwide Veterans Choice Program (www.va.gov/opa/choiceact/) and the VA BHHCS's current purchased care program for providing referrals or authorizations for purchased care (billed to VA). There would be no immediate reconfiguration providing for additional purchased care for Veterans from regional tertiary or secondary care facilities within the region.

In addition to obtaining services from the existing Hot Springs and Rapid City VA facilities and through current provisions for community providers, Veterans may seek care from other VA locations (such as Fort Meade), receive prescriptions from a VA pharmacy by mail, and, for some health conditions, take advantage of "telehealth".

2.3.6.2 Employment

VA BHHCS would employ similar levels of personnel under Alternative F as presently, approximately 357 FTEEs in Hot Springs and 30 FTEEs in Rapid City. Minor changes or the addition/subtraction of certain positions could happen over time based on changes in the volume of patients and the specific services provided at the existing facilities.

2.3.6.3 Estimated Cost

The estimated costs for Alternative F, using the same methodology and data sources described in Section 2.3.1.3, are summarized in Table 2-15.

Table 2-15. Estimated Costs for Alternative F

Build / Lease Options	Estimated 30-Year Life Cycle Cost
Renovate and maintain existing Hot Springs campus ($203,981,431) and continue to lease Rapid City CBOC ($11,101,000)	$215,082,431

Source: Jones Lang LaSalle 2012a.

2.3.6.4 Timeline

Alternative F represents the continuation of the current approach to health care services in the VA BHHCS. Identified renovation needs for the Hot Springs campus were assumed to be addressed over the course of a 30-year period, as budgets permit.

2.3.7 Supplemental Alternative G — Re-Use by Others of All or Part of Hot Springs Campus

Under Alternatives A, B, and D, VA BHHCS would no longer offer any medical services from the existing Hot Springs campus and nearly the entire campus could potentially become available for re-use by others. The National Cemetery and appropriate access will always remain under VA ownership and use.

Under Alternative C, VA BHHCS would continue operating from the existing hospital (Building 12); the domiciliary administration building, dining services, patient wards, and auditorium/library (Buildings 1–8 and 11); one duplex quarters (Building 29); fire/security facility (Building 66); boiler plant (Building 18) and fuel storage tanks; high voltage switchgear building (Building 64); and information resources management building (Building 65). Some or all of the following could potentially become available for re-use by others: the two chapels (Buildings 9–10); buildings previously or currently housing campus/facility support functions (Buildings 13, 14, 17, 23, 30, 31, 35, 42–45, 47, 50, 53, 57, 67, 68, A, B, C); the conservatory ("greenhouse") (Building 16); bandstand and recreation shelter (Buildings 19 and 62); quarters (Buildings 20, 21, 24–28); and three water reservoirs. (See Figure 2-2 for a campus map of the referenced buildings.)

VA currently has several authorities related to use, transfer, or sale of properties including permit to another federal, state, or local governmental agency; license to other entities; enhanced-use lease; *National Historic Preservation Act* Section 111 (historic) lease; in-kind swap for land or facilities in another location; transfer to another federal agency, or to state or local government; and transfer to a Native American tribe.

Re-use of some or (nearly) all of the Hot Springs campus could include activities undertaken by nonprofit groups; commercial interests; local, state, or other federal entities; or some combination of these. If potential developers are sought, VA would identify goals for the development. Examples of these uses could include the following, alone or in combination:

- Housing for homeless or at-risk Veterans and their families in accordance with the Building Utilization Review and Repurposing initiative.
- Medical education/research/treatment: Continued VA presence (such as Alternative C) with the remaining portion used for a medical/scientific research program that interacts

with or depends on the VA's continued presence, such as the "Medical Miracle" proposal (VNRC 2014) submitted by the nonprofit Veterans National Recovery Center. The three main elements of this specific proposal are:

- Minnekahta College of Osteopathic and Regenerative Medicine would "provide education to the cadre of osteopaths, hydro therapists, regenerative medicine experts, and other practitioners necessary to populate the world's new wave of medical technology". Some of the college's facilities would be located in new construction or repurposed space on the VA Hot Springs campus under the EUL program, with the remaining facilities in the City of Hot Springs.
- Battle Mountain Research Institute would be partially owned by the Swiss private sector firm Elanix and focus on regulatory clinical studies for regenerative products derived from human stem cells (human fetal tissue). A showcase research project is proposed to be a clinical trial of high quantity mineralized hydrotherapy for treatment of traumatic brain injury, PTSD, and military sexual trauma. A second showcase project is proposed to be clinical trials of four master human progenitor fetal tissue lines for skin, ligaments, tendon, and bone, incorporating application technique, and hydrotherapeutic convalescence. This institute would be located either in the City of Hot Springs or on the VA Hot Springs campus through the EUL program.
- Battle Mountain Clinic, a part of the medical college, would support medical training at the VA hospital and the clinical research of the Battle Mountain Research Institute (see above) on VA-owned property at or near the VA Hot Springs campus and leased to the developer through the EUL program

The Medical Miracle proposal calls for initial funding to the nonprofit Veterans National Recovery Center (and through them to the elements listed above) from the public sector and charitable contributions; self-funding the college, research institute, and clinics through tuition, research grants, and contracts; and an endowed foundation supported by a private sector startup firm that deals in regenerative medicine. The proposer estimated the cost to the federal government as $8 million the first year and a total of $50 million over five years, and stated that "much of this money will be refunded to the public sector investor and/or other donors after year five and may be treated as a loan for budgeting purposes." The cost of combining Alternative C with the Medical Miracle version of Alternative G would be $230–$280 million over 30 years, for a refund amount ranging from none to all, and assuming no further financial support would be required from VA over this timeframe.

- Continued VA presence with additional renovated housing for single-parent and handicapped Veterans in treatment programs; this could supplement Alternative C and is a component of Alternative E.
- A VA-associated teaching hospital for rural health care providers and housing for students in training.
- Veterans' education, job training, and related housing.
- Community and economic development such as rental housing, retail, or office space.
- Tourism and recreation such as a vacation resort or museum.

- Campus and facility for higher learning, such as a vocational school, community college, or small university.
- Corporate retreat.

Any options for re-use of the VA Hot Springs campus buildings or landscape would have to consider and be consistent with preserving the historic significance of the National Historic Landmark.

On July 1, 2015, VA published Solicitation VA10115N0183 seeking expressions of interest for the development of the existing Hot Springs campus. The announcement included potential use of any of the current VA authorities and requested the submission of organization information, whether the interest is for the entire campus or portion thereof, whether the interest was for a lease or ownership, and the potential funding source for project. The submissions that are received will be used to gauge the interest level of prospective purchasers, lessees, developers, or operators and may be used to develop formal Requests for Proposal at a future date, depending on the outcome of the EIS process and other VA management decisions.

2.4 Alternatives Identified But Not Evaluated in Detail

A NEPA review specifies the purpose of and need for a proposed action, describes the action that the federal agency proposes to meet that purpose and need, and identifies reasonable alternatives to that action. A potential alternative might be eliminated from detailed consideration for many reasons including, but not limited to, if the alternative would not meet the purpose and need, take too long to implement, is not within the agency's purview to implement, would be prohibitively expensive, or would be highly speculative in nature and thus is considered unreasonable.

During the scoping process for this EIS, several alternatives for reconfiguring health care services in the VA BHHCS catchment area were identified or suggested by stakeholders but were not evaluated in detail. Reasons for not including these alternatives in the EIS analysis include that the suggestion does not meet the purpose of and need for the reconfiguration proposal (see Chapter 1), is not within VA's authority to implement, is not able to be defined sufficiently for meaningful analysis, or is a specific suggestion for services (with no changes to facilities) that is independent of this NEPA review. The alternatives identified but not evaluated in detail include the following:

- Hot Springs should remain open, but ownership and management should be decentralized and transferred to elected boards of veterans using a cooperative or employee-owned model of ownership and control.
- Restore Hot Springs and provide the full services it once offered. Provide more doctors and nurses to expand and continue health care services in Hot Springs
- Close Fort Meade instead of Hot Springs. Return Fort Meade to the SD National Guard.
- Close VA facilities at both Hot Springs and Fort Meade and build a new Department of Defense/VA hospital in one location near Ellsworth Air Force Base or in Rapid City to combine the services.
- Close the VA hospitals in Hot Springs and Fort Meade and consolidate services in Rapid City.

- Keep Hot Springs and Fort Meade open and add a large outreach program with regional hospitals. Use Southern Nevada Veterans Outreach program as a model.
- Open VA CBOCs in other communities (Alliance, Spearfish, others).
- Add a services agreement with Box Butte General Hospital in Alliance to save drive time. (Note: This is one of the 18 critical access hospitals for which purchased care would become available in the proposal for reconfiguring VA BHHCS health services; see Section 2.1).
- Close the VA in Hot Springs and let Veterans go to their own private doctors.
- Develop modern and new medical facilities to attract and retain more qualified staff.
- Expand telemedicine (telehealth) services to reduce time and expense for traveling to receive care.
- Allow Veterans to use available domiciliary space as overnight accommodations when traveling to receive care.

Other comments submitted during scoping were not stand-alone alternatives but pertained to one or more of Alternatives A through G.

2.5 Comparison of Environmental Impacts of Alternatives

The Executive Summary contains a table that summarizes the potential environmental impacts of the evaluated alternatives, by environmental resource, based on the analysis presented in Chapter 4 of this EIS.

2.6 Preferred Alternative

VA BHHCS's preferred alternative is Alternative A, which would add purchased care from 3 tertiary and 26 secondary community providers, construct an MSOC and 100-bed RRTP facility in Rapid City, construct a CBOC in Hot Springs, discontinue services at the Hot Springs campus including the Battle Mountain Sanitarium National Historic Landmark, and identify and approve appropriate re-use of the Hot Springs campus under Supplemental Alternative G. Alternative A, with or without Supplemental Alternative G, would meet the purpose of and need for action.

2.7 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. This conclusion is based on the following determinations:

- Potential impacts from Alternatives A through E, with mitigation measures applied, would be negligible to minor to aesthetics, noise, land use, floodplains and wetlands, solid waste and hazardous materials, community services, transportation and traffic, utilities, and environmental justice. Alternative F would have no impacts to these resources, with the exception of negligible impacts from ongoing generation of solid waste and hazardous materials, short-term noise during renovations, and continued use of utilities.

- Potential construction-related impacts to air quality, geology and soils, hydrology and water, and wildlife and habitat are generally proportional to the ground surface area disturbed. Alternatives A through E would disturb from 2 to 25 acres. Alternative F would not disturb any ground surface.
- Alternative E has the greatest potential for impacts to the Battle Mountain Sanitarium National Historic Landmark, as a result of proposed expanded operations, renovations, and construction on the VA Hot Springs campus. Alternative D has the most potential for affecting as-yet unidentified cultural resources from off-campus construction, depending on the locations selected for new facilities. Alternative F would have no off-campus effects and the least amount of on-campus construction or renovations.

Alternative F does not meet the purpose of and need for action.

3.0 AFFECTED ENVIRONMENT

Each section of this chapter addresses one of the 15 environmental resources or issues for which impacts are assessed in this environmental impact statement (EIS):

- Aesthetics
- Air quality
- Cultural resources and historic properties
- Geology and soils
- Hydrology and water quality
- Wildlife and habitat
- Noise
- Land use
- Floodplains and wetlands
- Socioeconomics
- Community services
- Solid waste and hazardous materials
- Transportation and parking
- Utilities
- Environmental justice

The regulatory and policy framework relevant to each resource is summarized, and the existing conditions are described; these discussions provide a current baseline for analyzing potential impacts. The last subsection of this chapter lists the projects and activities ongoing or proposed in the Rapid City and Hot Springs areas, regardless of who is implementing them, that could contribute to cumulative impacts with VA's proposal.

3.1 Aesthetics

Aesthetics include the physical (natural and manmade) and biological features of the landscape that contribute to the visual character or scenic quality of an area. Scenic quality is a measure of the visual appeal of the landscape, which is subjective and varies among observers. A viewshed is the area that is visible from a specified location.

3.1.1 Regulatory and Policy Framework

There are no federal standards relating to aesthetics or visual resources that apply to Department of Veterans Affairs (VA) actions. In carrying out its federal functions, VA is not subject to state or local regulations absent a clear statutory waiver to the contrary. This concept is based upon the Supremacy Clause (Article VI) of the U.S. Constitution. Although local governments cannot regulate activities of the federal government on federally owned land, federal agencies must consider local requirements for aesthetic qualities of new building construction (40 United States Code 619(b)). VA actions on non-federal land are subject to the regulatory jurisdiction of the landowner, including local plans or codes pertaining to aesthetics.

A viewshed, as it pertains to the setting of a historic property, is evaluated in accordance with regulations implementing Section 106 of the *National Historic Preservation Act* (NHPA) (see Section 3.3).

3.1.2 Current Conditions

3.1.2.1 VA Hot Springs Campus

3.1.2.1.1 Setting and Landscape

The VA Hot Springs campus occupies approximately 68 acres atop a bluff overlooking the Fall River to the north, west, and south; and the Hot Springs business district and the historic River Street to the southwest. The red-hued bluffs and canyon walls of the Fall River are visible to the north and west. Large stately houses built by prominent Hot Springs residents during the late nineteenth and early twentieth century are visible on the wooded bluff opposite the campus to the west. An aerial view of the campus is shown in Figure 3.1-1.

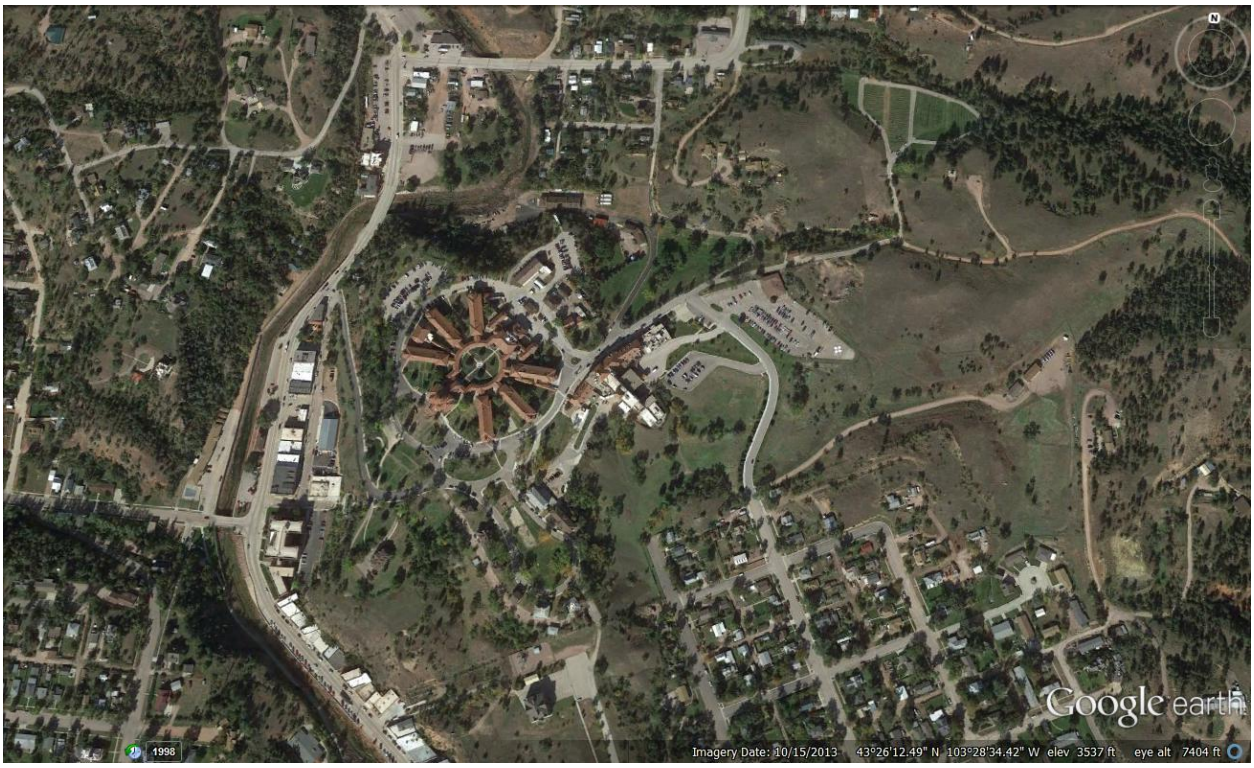


Figure 3.1-1. Aerial View of VA Hot Springs Campus and Landmarks.

The Battle Mountain landform, for which the early-day sanitarium was named, rises to about 4,400 feet in elevation to the east of the campus. At approximately 3,560 feet in elevation, the campus sits about 100 feet above the Fall River channel and about 840 feet lower than the Battle Mountain peak.

The original hospital, wards, administration building, quarters, and some of the support buildings were constructed on the bluff plateau, with the original hospital complex and the governor's quarters occupying the highest and most prominent locations. The site slopes down toward the northeast at the rear of the original hospital complex, which reduced the visibility of the support buildings (conservatory, stable, carriage house, power plant, and root cellar) from the hospital and wards.

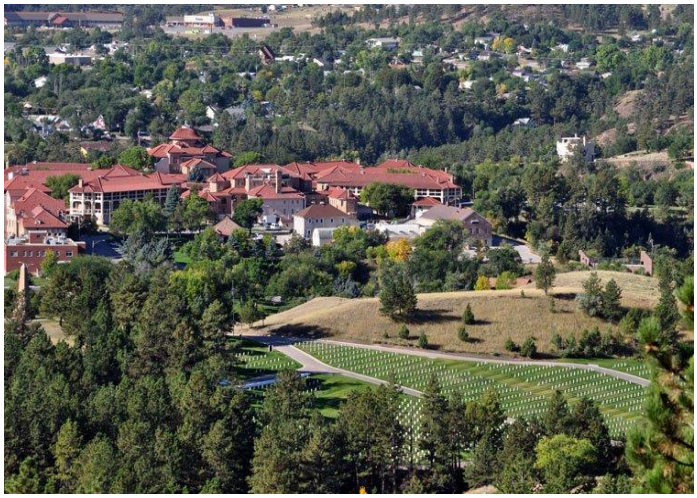
Hot Springs National Cemetery covers approximately nine acres on the campus at the foot of Battle Mountain. The north sloping site provides an open view to the hills to the northeast. Located about a quarter mile northeast of the Administration Building, the cemetery location is largely out of view from the occupied buildings on the campus.

Very little vegetation screened the campus from the community below when the sanitarium buildings were constructed, but today mature vegetation on the slopes of the bluff and on the campus blocks many views to and from the campus.

Sources of nighttime light on the campus include street lights and security lights around buildings and hospital parking lot.

Figure 3.1-2 shows representative photos of the VA Hot Springs campus setting.

View to east of Battle Mountain; Battle Mountain Monument in Hot Springs National Cemetery visible at picture center.



View to west of VA Hot Springs campus and national cemetery.

Figure 3.1-2. Representative Photos of the Setting and Landscape

3.1.2.1.2 Buildings and Architecture

The picturesque road layout reflects the era's appreciation for naturalistic settings (NPS 2010). Curving roads encircle the original hospital complex and the residential area.

The original hospital complex was designed around a circular courtyard with a prominent administration center (Building 1) and service buildings (Buildings 2, 9, and 10), and six hospital wards (Buildings 3 through 8) connecting as rectangular spokes. The architecture is a Mission/Spanish Colonial style that incorporated elements of the Romanesque architecture that was visible in the town of Hot Springs at the time of construction (NPS 2010). The buildings were constructed from local sandstone, and featured massive walls, bands of arched and deeply recessed windows, and arched entries. The combination of the different architectural styles with the use of

local sandstone and red tile roofs created a particularly attractive facility in a striking location at the top of the bluff.

The hospital annex (Building 12) was constructed later, completed in 1926, and a number of additions to the building have been constructed over the years. The original structure, with a design similar to Buildings 1 through 10, had eight bays of varying heights. It was built of sandstone with a red tile roof, but the additions have been constructed with different materials. The later additions to the hospital are south and east of the original structure, and because of elevation are not very visible from the original hospital complex.

The stairway linking the historic business district of Hot Springs to the grounds of the campus, referred to as the Grand Staircase, was constructed in 1915 of pink sandstone and concrete with lampposts and black iron railings. The ornamental staircase splits into two stairways about half-way to curve around an area with a fountain (no longer functioning) and landscaping. The stairways rejoin at the next landing to continue to the top.

The staff quarters and the governor's quarters that were constructed in 1907 were laid out in a loop along the southwest edge of the bluff. The quarters have a Colonial/Tudor architectural mix and are wood construction on sandstone foundations. The duplex quarters constructed in the 1920s have Neoclassical/Classical architecture and are wood frame construction on sandstone foundations. Landscaping of trees and shrubs surround the quarters.

The main entrance road to the campus from North 5th Street has views of Battle Mountain to the east and is lined with mature trees on the west.

Figure 3.1-3 shows representative photos of the buildings on the VA Hot Springs campus.

View to east of Administration Building 1.

View to west of Domiciliary Building 8.

Figure 3.1-3. Representative Photos of VA Hot Springs Campus Buildings.

View to west of rear of Hospital Building 12.

View to east of Grand Staircase from National Avenue.

Figure 3.1-3. Representative Photos of VA Hot Springs Campus Buildings (continued).

3.1.2.2 City of Hot Springs

The City of Hot Springs sits in the canyon of Fall River at the base of Battle Mountain to the east, Seven Sisters Range to the south, and Hot Brook and Cold Brook canyons to the north-northwest. The visual appeal of the city is the surrounding sandstone cliffs and evergreen forests. Most of the oldest part of the city is designated as a historic district and maintains many of the original buildings constructed to support the city's early days as a resort destination for the therapeutic warm waters in the area. The historic River Street business area is characterized by Richardsonian Romanesque buildings constructed of pink sandstone from Fall River County quarries. The newer areas of Hot Springs are typical of more modern buildings and houses.

Sources of nighttime light throughout the city include street lights and security lights for buildings and parking lots.

3.1.2.3 City of Rapid City

Rapid City, called the gateway to the intermountain west, is set against the eastern slope of the Black Hills. The city was initially established along Rapid Creek and has expanded to a larger area that is divided by a mountain range into eastern and western parts. The visual appeal of the city is the mountain range to the west, the plains to the east, parkland along Rapid Creek, and the redevelopment and preservation of the city's historic core. Rapid City includes business and housing areas that are typical of an urban community with surrounding suburban and rural neighborhoods.

Sources of nighttime light throughout the city include street lights and security lights for buildings and parking lots.

3.2 Air Quality

This section describes the air quality regulations applicable to the proposed action and the regional air quality in the VA Black Hills Health Care System (BHHCS) catchment area.

3.2.1 Regulatory and Policy Framework

3.2.1.1 National Ambient Air Quality Standards

As required by the *Clean Air Act*, the U.S. Environmental Protection Agency (EPA) set National Ambient Air Quality Standards (NAAQS) for selected criteria pollutants considered harmful to public health and the environment: ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, particulate matter (PM), and lead (40 Code of Federal Regulations [CFR] Part 50), with an averaging time and data form for determining compliance specific to each standard. Primary NAAQS are limits set to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary NAAQS protect public welfare, including protection against visibility impairment and damage to animals, crops, vegetation, and buildings.

Based upon ambient air quality monitoring data, U.S. EPA designates areas within each state as:

- in ***attainment*** for those NAAQS that are being met;
- in ***non-attainment*** for any NAAQS that are being exceeded;
- in ***maintenance*** if the area was reclassified from non-attainment to attainment and is therefore subject to an EPA-approved maintenance plan; or
- ***unclassified*** if no determination has been made.

For areas of non-attainment, a federally enforceable state implementation plan is implemented with the goal of achieving attainment.

"General conformity" requirements apply to all federal actions (EPA 2014a). The purpose of the General Conformity Rule is to ensure that:

- Federal activities do not cause or contribute to a new violation of a NAAQS
- Actions do not cause additional or worsen existing violations of or contribute to new violations of the NAAQS
- Attainment of the NAAQSs is not delayed

The general conformity regulations (40 CFR 93 Subpart B) establish *de minimis* thresholds for criteria pollutants and precursors. A "conformity determination" is required for each criteria pollutant or precursor where the total of direct and indirect emissions of the criteria pollutant or precursor in a nonattainment or maintenance area caused by a federal action would equal or exceed any of the *de minimis* thresholds (40 CFR 93.153(b)).

3.2.1.2 Clean Air Act Title V Operating Permit Requirements

Title V of the *Clean Air Act* regulates emissions of 188 specific hazardous air pollutants (HAPs) (40 CFR Part 70). Sources that meet the definition of a "major source" of either the criteria pollutants (regulated by the NAAQS) or HAPs must apply for and obtain a Title V operating permit. For HAPs a major source is one that has the potential to emit more than 10 tons per year of any individual HAP, or 25 tons per year of any combination of HAPs. For criteria pollutants, the definition of a major source depends on the region's attainment status: in an attainment area, a major source is one that has a potential to emit more than 100 tons per year of any criteria pollutant, with more restricted levels at various classifications of non-attainment for some criteria pollutants (40 CFR 70.2).

The South Dakota Department of Environment and Natural Resources (SDDENR) issued the Title V permit for the Hot Springs VA Medical Center (VAMC), Permit #28.0102-27 (SDDENR 2013), effective from March 4, 2014 until SDDENR takes final action on the current application for renewal. Units covered by the Title V permit are described in Table 3.2-1.

Table 3.2-1. Description of Title V Permitted Units

Unit	Description	Maximum Operating Rate
3	Boiler #3 – 1974 Nebraska boiler, water tube model, fired with distillate oil	20.4 million BTU per hour heat input
4	Boiler #4 – 2004 Hurst boiler fired with distillate oil	7.5 million BTU per hour heat input
5	Boiler #1 – 2008 Cleaver Brooks boiler, model CEW-101-500-150, fired on distillate oil	20.4 million BTU per hour heat input
6	Boiler #2 – 20 II Cleaver Brooks CEW-101500-200ST, 500 horsepower, fired on distillate oil	20.4 million BTU per hour heat input
7	Emergency generator # 1, Gen-Dom-1998 Generac 98A 032195, fired on distillate oil	80 kilowatts, 60 horsepower
8	Emergency generator #2, Gen-BP-1997 Cummins Onan 230DF AB, fired on distillate oil	230 kilowatts, 172 horsepower
9	Emergency generator #3, Gen-Hosp-2001 Generac 1740510100 Type SD400, fired on distillate oil	400 kilowatts, 298 horsepower

Note: BTU = British thermal unit.
Source: SDDENR 2013.

3.2.1.3 New Source Review

The New Source Review (NSR) permitting program, under Title I of the *Clean Air Act*, is a preconstruction permitting program that assures that air quality is not degraded by new stationary emission sources or modified old sources. There are three types of permits issued under this program (EPA 2015a):

- "Prevention of Significant Deterioration" NSR permits are required for new major sources or a major source making a major modification in an attainment area or unclassified area

- Nonattainment NSR permits are required for new major sources or major sources making a major modification in a nonattainment area
- Minor source NSR permits for new construction or modifications with emissions that do not meet the thresholds of major sources

3.2.1.4 State and Local Regulations and Coordination

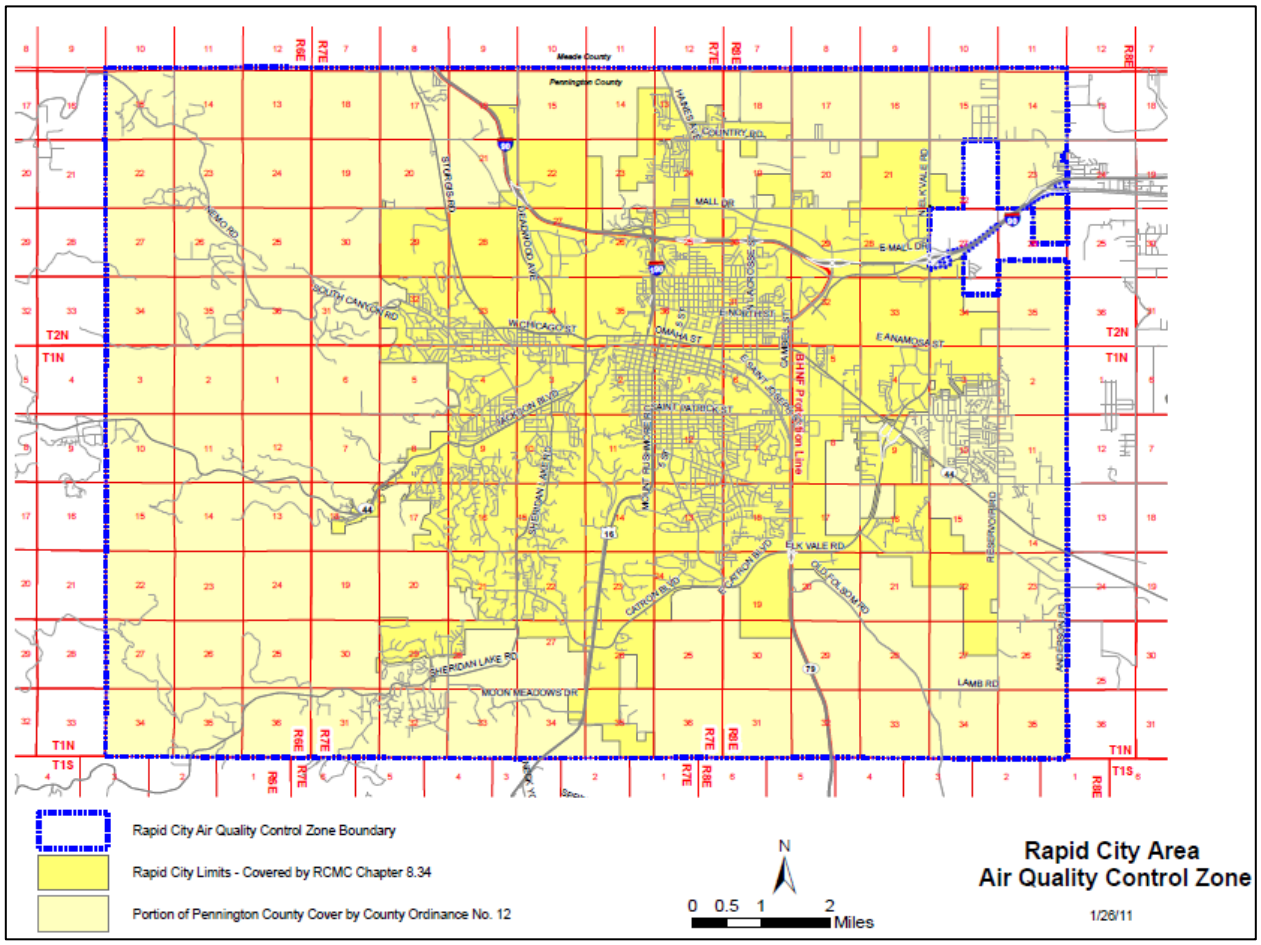
States may establish air quality standards that are more stringent than the federal standards (40 CFR 50.2), but South Dakota has adopted the federal standards. Air quality laws are included in South Dakota Codified Laws Section 34A-1, and rules for the state program are contained in the South Dakota Administrative Rules Section 74:36. State-wide air compliance and enforcement activities are coordinated by the SDDENR Air Quality Program.

South Dakota is a member state of the Western States Air Resources Council, which addresses air quality issues of regional concern (WESTAR 2014) and the Western Governors' Association initiative on weather and climate risk (Western Governors' Association 2014).

For project activities in the Rapid City area, the Pennington County Department of Ordinance Enforcement implements procedures for the enforcement of county ordinances relating to environmental and resource issues, among other issues. The only air quality-related ordinance is Pennington County Ordinance No. 12, *Fugitive Emissions and the Abatement of Smoke*. This ordinance applies to construction (and other activities) in a limited area of Pennington County.

Rapid City may administer an air quality control program within its jurisdiction, in accordance with South Dakota Codified Laws 34A-1-36. The Rapid City Air Quality Control Board works to maintain compliance with the NAAQS, especially particulate matter. The Rapid City Air Quality Control Board achieves its goals through programs to control, abate, and educate about fugitive dust emissions and smoke from wood burning and open burning (Rapid City 2014). Rapid City's air quality is regulated under Rapid City Code of Ordinance 8.34-*Fugitive Emissions and the Abatement of Smoke*. Figure 3.2-1 shows Rapid City air quality control zones.

No Fall River County or City of Hot Springs ordinances specifically address air quality issues.



Source: RCAQD 2014.

Figure 3.2-1. Rapid City Air Quality Control Zones

3.2.2 Current Conditions

Construction and operation of new facilities, and discontinued use of existing facilities, could occur in Hot Springs (Fall River County) and Rapid City (Pennington County) under Alternative A through G; therefore, the air quality analysis in this EIS focuses on these two counties.

3.2.2.1 Regional Climate

Weather and climate are important influences on air resources in this region. Cold weather limits the range of pollution control options available, and high winds in the area contribute to pollutant dispersion. Rapid City sits at an elevation of 3,250 feet and Hot Springs sits at an elevation of 3,448 feet. The climate of this region is classified as mid-latitude steppe according to the Koppen climate system and is characterized by arid summers and dry winters (NWS 2014). Average minimum and maximum temperatures measured at the Rapid City Weather Forecast Office are 16.4 and 37.4 degrees Fahrenheit in January and 61.7 and 84.3 degrees Fahrenheit in July. Average minimum and maximum temperatures in Hot Springs are similar: 14.4 and 41.3 degrees Fahrenheit in January and 57.2 and 89.2 degrees Fahrenheit in July. The average annual precipitation is 17.7 inches in Hot

Springs and 19.8 inches in Rapid City. Both locations show similar monthly rainfall patterns, with May typically being the wettest month and January the driest month (NCDC 2014a, 2014b). Prevailing winds are from the north and northwest, with average daily wind speeds ranging from 10 to 13 miles per hour (Cedar Lake Ventures, Inc. 2014).

Geography also has a particular influence on air quality in Rapid City, as summarized by SDDENR: "Western Rapid City lies in the middle of the geological formation termed the limestone racetrack that surrounds the Black Hills National Forest. It is bordered on the west and south by the Black Hills and on the east by a series of hogback hills creating a bowl-like formation ideal for air pollution problems" (SDDENR 1998). Air quality is poor when winter temperature inversions (cold air trapped below warm air) occur in this area (RCAQD 2014).

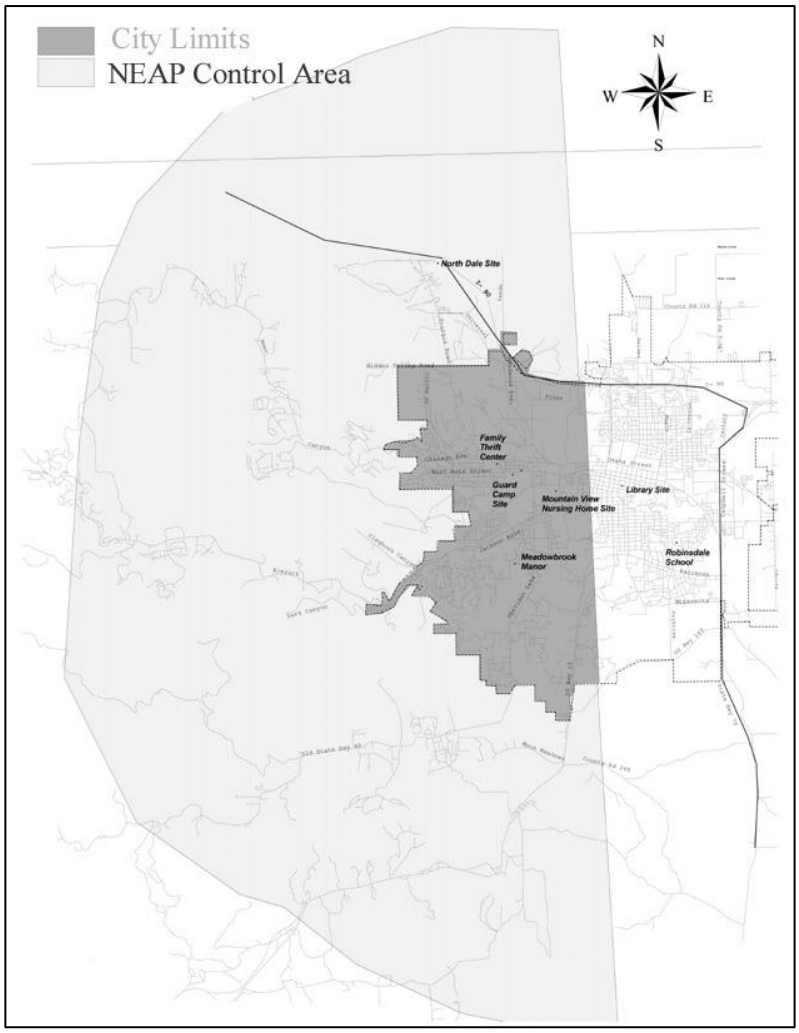
3.2.2.2 Regional Attainment Status for National Ambient Air Quality Standards

The project area includes the counties of Fall River and Pennington, SD. The region for which the U.S. EPA designates NAAQS attainment is the "Black Hills-Rapid City Intrastate Air Quality Control Region (South Dakota)" which consists of the South Dakota counties of Butte, Custer, Fall River, Lawrence, Meade, and Pennington (40 CFR 81.214). From 1978 to 1991, part of Pennington County was designated in nonattainment for the particulates standard that was in place at the time (EPA 2014b). Since then, the region has been designated as unclassified or in attainment for all criteria pollutants. At this time, there are no designated maintenance or non-attainment areas in South Dakota for any criteria pollutants (EPA 2014c, 2015b).

Though the region is currently in attainment for all criteria pollutants, particulate pollution has historically been a problem in the Rapid City area. In 1978, the area around Rapid City (before the current air quality control region was defined) was designated as non-attainment for a NAAQS for total suspected particulates that is no longer in effect (EPA 2014b). Since then, the area has had several exceedances of the NAAQS for particulate matter less than 10 micrometers in diameter (PM_{10}). In 1992, there were two exceedances of the PM_{10} standard that was promulgated in 1986 that did not violate the NAAQS because the form of the standard is "not to be exceeded more than once per year on average over 3 years". In 1996, there were three exceedances, followed by a fourth in 1997, triggering a review process by EPA. Additional exceedances of the PM_{10} standard were measured in Rapid City in 2000, in 2001, and twice in 2002 (RCAQD 2014). Still, the area is designated as in attainment for all particulate matter NAAQS due to an EPA policy of allowing exclusion of PM_{10} air quality data that are attributable to natural events (volcanic and seismic activity, wildland fires, or high wind events) (Nichols 1996). To qualify for this exclusion, the SDDENR developed a Natural Events Action Plan, and sources that contribute to fugitive dust emissions must install and implement best available control measures (SDDENR 1998, 2005). The state plan was approved by EPA in 1998 and updated in 2005. Best available control measures were developed for industrial fugitive dust sources in the west Rapid City area to which the plan applies (Figure 3.2-2) and are federally enforceable through the facility's minor source permits. High wind dust alerts are called when all of the following conditions are forecast, although they may be (and have been at times) called when only one or two of the conditions are expected:

- Hourly wind speeds exceed 20 miles per hour
- Peak wind gusts are greater than 40 miles per hour
- Five consecutive days of 0.02 inches or less of precipitation each day excluding dry snow

The fugitive dust emissions sources are individually notified of high wind dust alerts. During alerts, the SDDENR requests that construction activities be ceased or minimized, or that the facilities use additional measures to prevent fugitive dust. Restrictions on construction activities are voluntary (SDDENR 2005).



Source: SDDENR n.d.

Figure 3.2-2. Natural Events Action Plan Control Area.

3.2.2.3 Emission Sources

3.2.2.3.1 Regional Sources

The National Emission Inventory provides estimates of criteria and hazardous air pollutant emissions from all air emissions sources. The latest available National Emissions Inventory is from 2011. At the time of this writing, the 2014 inventory, the next inventory to be completed in the three-year cycle, is not yet available (EPA 2015c). Economic sectors emitting more than 100 tons per year of a pollutant in Pennington County or Fall River County are shown in Table 3.2-2.

Table 3.2-2. 2011 National Emissions Inventory Data

Pollutant	Economic Sectors Emitting More than 100 Tons per Year (aggregated for all sources in county)	
	Pennington County	**Fall River County**
Acetaldehyde	biogenics (vegetation and soil), commercial cooking, agricultural field burning, prescribed fire, wildfire, electric generations, industrial boilers, residential fuel combustion, oil and gas production, pulp and paper, mobile sources, solvent use, waste disposal	biogenics (vegetation and soil), commercial cooking, agricultural field burning, prescribed fire, wildfire, residential fuel combustion, oil and gas production, mobile sources, waste disposal
Ammonia	fertilizer application, livestock waste, prescribed fire	fertilizer application, livestock waste, wildfire
Benzene	bulk gasoline terminals, commercial cooking, agricultural field burning, prescribed fire, wildfire, electric generations, industrial boilers, residential fuel combustion, gas stations, oil and gas production, mobile sources, solvent use, waste disposal	bulk gasoline terminals, commercial cooking, agricultural field burning, prescribed fire, wildfire, residential fuel combustion, gas stations, oil and gas production, mobile sources, waste disposal
Carbon dioxide	prescribed fire, wildfire, mobile sources	prescribed fire, wildfire, mobile sources
Carbon monoxide	biogenics (vegetation and soil), agricultural field burning, prescribed fire, wildfire, residential wood combustion, cement manufacturing, industrial processes not elsewhere classified, mobile sources, waste disposal	biogenics (vegetation and soil), agricultural field burning, prescribed fire, wildfire, mobile sources
Formaldehyde	biogenics (vegetation and soil), commercial cooking, agricultural field burning, prescribed fire, wildfire, electric generations, industrial boilers, residential fuel combustion, oil and gas production, pulp and paper, mobile sources, solvent use, waste disposal	biogenics (vegetation and soil), commercial cooking, agricultural field burning, prescribed fire, wildfire, fuel combustion, oil and gas production, mobile sources, waste disposal
Hexane	bulk gasoline terminals, prescribed fire, wildfire, electric generations, residential fuel combustion, gas stations, oil and gas production, mobile sources, solvent use, waste disposal	bulk gasoline terminals, prescribed fire, wildfire, residential fuel combustion, gas stations, oil and gas production, mobile sources, solvent use
Methane	prescribed fire, wildfire	prescribed fire, wildfire
Methanol	biogenics (vegetation and soil), oil and gas production, pulp and paper, aircraft, solvent use, waste disposal	biogenics (vegetation and soil), oil and gas production, aircraft, solvent use, waste disposal
Nitrogen oxides	biogenics (vegetation and soil), prescribed fire, coal-fired electricity generation, residential natural gas use, cement manufacturing, industrial processes not elsewhere classified, mobile sources	biogenics (vegetation and soil), wildfire, mobile sources
PM_{10}	agriculture, construction, dust from paved roads, dust from unpaved roads, prescribed fire, wildfire, waste disposal	agriculture, dust from unpaved roads, prescribed fire, wildfire, mining

Table 3.2-2. 2011 National Emissions Inventory Data (continued).

Pollutant	Economic Sectors Emitting More than 100 Tons per Year (aggregated for all sources in county)	
	Pennington County	Fall River County
Particulate matter less than 2.5 micrometers in diameter	agriculture, construction, dust from paved roads, dust from unpaved roads, prescribed fire, wildfire	prescribed fire, wildfire
Sulfur dioxide	prescribed fire, coal-fired electricity generation, cement manufacturing	wildfire
Toluene	bulk gasoline terminals, commercial cooking, agricultural field burning, prescribed fire, wildfire, electric generations, industrial boilers, residential fuel combustion, gas stations, oil and gas production, mobile sources, solvent use, waste disposal	bulk gasoline terminals, commercial cooking, agricultural field burning, prescribed fire, wildfire, residential fuel combustion, gas stations, oil and gas production, mobile sources, solvent use, waste disposal
Volatile organic compounds	biogenics (vegetation and soil), bulk gasoline terminals, prescribed fire, wildfire, gas stations, pulp and paper, mobile sources, consumer and commercial solvent use, industrial surface coating and solvent use, nonindustrial surface coating, waste disposal	biogenics (vegetation and soil), prescribed fire, wildfire, mobile sources

Source: EPA 2015c.

3.2.2.3.2 VA BHHCS Facility Emissions

Fuel combustion and construction/maintenance activities at VA BHHCS medical facilities produce air emissions. Specifically, four boiler units (fed with distillate fuel oil) and three emergency generators (fed with distillate fuel oil) at the Hot Springs VAMC are permitted under Title V Air Quality Permit Number 28.0102-27. The Title V permit specifies the maximum operating rate for each unit, and requires recordkeeping for the volume and sulfur content of the distillate fuel oil burned in the boilers and the number of hours each unit is in operation. Additionally, the Title V permit specifies limits for visible emissions, total suspended particulate emissions, and sulfur dioxide emissions. The VAMC is currently in compliance with the Title V permit conditions.

Construction and maintenance activities also produce air emissions, including total suspended particulate and fuel combustion by-products. These mobile sources are not individually permitted, and their operation is not continuous. Proper equipment maintenance prevents unacceptable emissions from these mobile sources.

Emissions from contracted and leased facilities, such as the existing Rapid City CBOC, are not regulated by VA air quality permits.

3.3 Cultural Resources and Historic Properties

Cultural resources, including historic properties, are nonrenewable representations of our human past and heritage. The regulatory setting for these resources and their relationships to federal actions and undertakings are presented below, followed by background on their identification, areas of potential effects (APEs), consultation and outreach, and cultural background. Specific attention is given to historic properties of religious and cultural significance, historic districts, and to National Historic Landmarks (NHLs) (ACHP 2015).

3.3.1 Regulatory and Policy Framework

For purposes of analysis under the *National Environmental Policy Act* (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 National Register of Historic Places (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.

The regulations implementing Section 106 of the NHPA encourage the coordination of reviews under Section 106 with concurrent reviews under NEPA, the *Archaeological Resources Protection Act*, the *Native American Graves Protection and Repatriation Act*, and other authorities (36 CFR 800.3(c)). VA is following the substitution process of 36 CFR 800.8(c) to meet the Section 106 review requirements for cultural resources and historic properties for this federal action and undertaking. This means that VA is using the information and documentation required to prepare the EIS and record of decision for the reconfiguration proposal to comply with Section 106 in place of the procedures in 36 CFR 800.3 through 800.6.

3.3.2 Cultural Resource and Historic Property Identification

VA BHHCS applied the following approach to identify historic properties within the study area defined as the BHHCS service area (see Figure 1-1 in Section 1.1). This approach is based on the Council on Environmental Quality and Advisory Council on Historic Preservation guidance for integrating NEPA and Section 106 (CEQ/ACHP 2013).

- Establish, in consultation with the State Historic Preservation Office (SHPO), the APEs for the various alternatives of the reconfiguration proposal.
- Seek information from SHPO, other consulting parties including tribal and local governments, and appropriate archives for known and potential historic properties within the APE.

- Consult with SHPO and other consulting parties to determine NRHP eligibility for identified cultural resources in the APEs, and confirm for those already NRHP-listed properties their retention of significance, integrity, and character-defining features.
- Establish, in consultation with the Section 106 consulting parties, the phased approach to identifying and evaluating potential historic properties at places selected in the future for new facilities associated with the alternatives.

3.3.3 Areas of Potential Effects for Historic Properties

Within the VA BHHCS service area and EIS study area, VA identified two geographic areas (APEs) where the reconfiguration proposal could alter the character or use of historic properties. These APEs encompass the cities of Hot Springs and Rapid City (see Figure 1-1 in Section 1-1 for the locations of these cities within the VA BHHCS service area).

The Hot Springs APE (Figure 3.3-1) includes the VA Hot Springs campus and potential but as-yet unidentified locations for new VA facilities proposed under some of the EIS alternatives.

The Rapid City APE (Figure 3.3-2) includes the potential but as-yet unidentified locations for new VA facilities under some of the EIS alternatives.

The alternatives propose construction (new buildings or modifications to existing buildings) at locations yet to be identified in Hot Springs and Rapid City. When identified, these locations would receive phased review under the Section 106 process following 36 CFR 800.4(b)(2), and APEs would be revised, as necessary. VA would continue to adhere to Section 106 and guidelines in VA's cultural resource management procedures (VA 2011) during future planning and actions involving acquisition and construction of properties.

VA continues to consider the entire VA BHHCS service area as the EIS study area for cultural resources. No connected actions have been identified at other locations within the service area where effects from the proposed reconfiguration would extend; thus, no expansion is made to the APEs beyond the areas of Hot Springs and Rapid City or to include the Fort Meade VA campus.

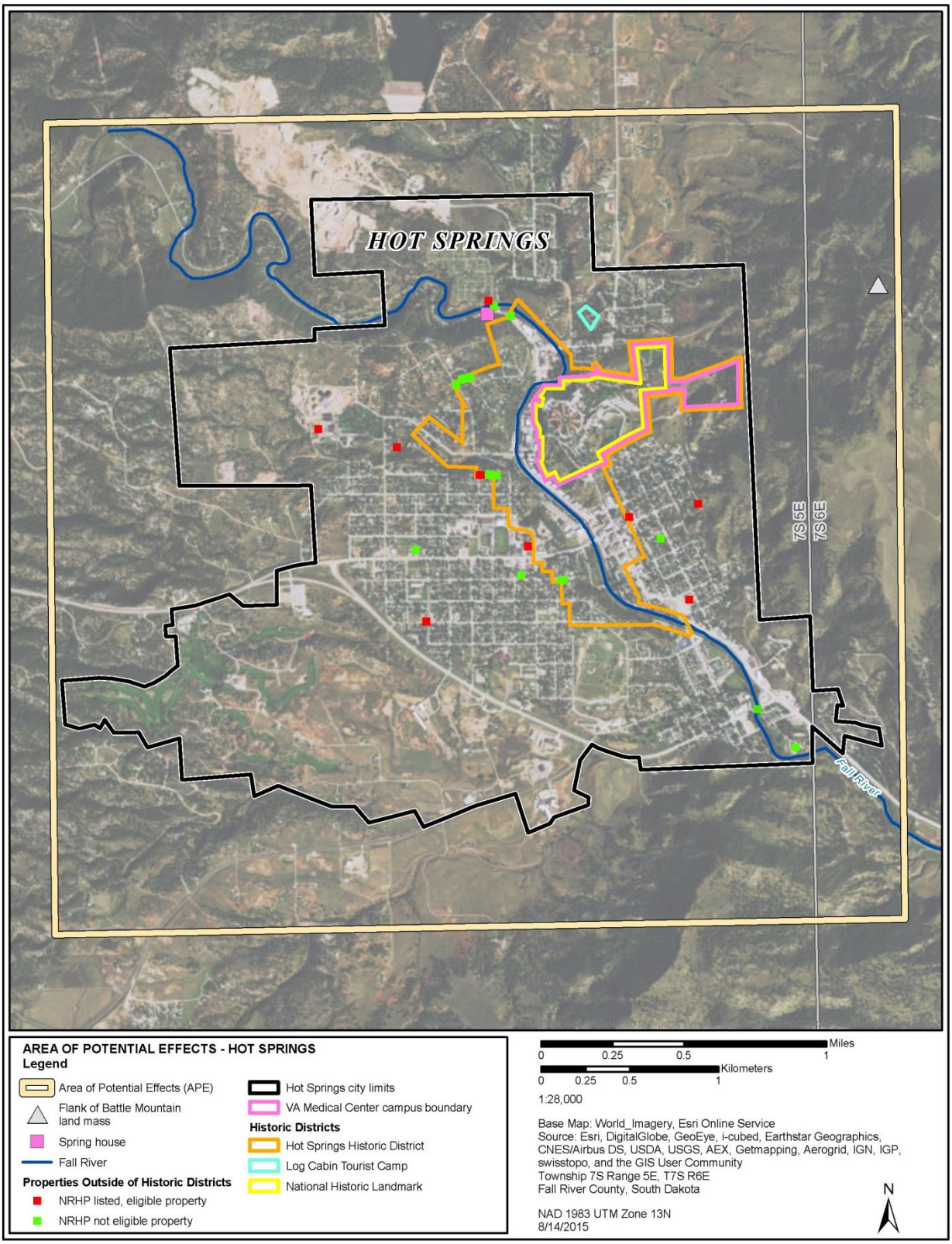


Figure 3.3-1. Area of Potential Effects – Hot Springs.

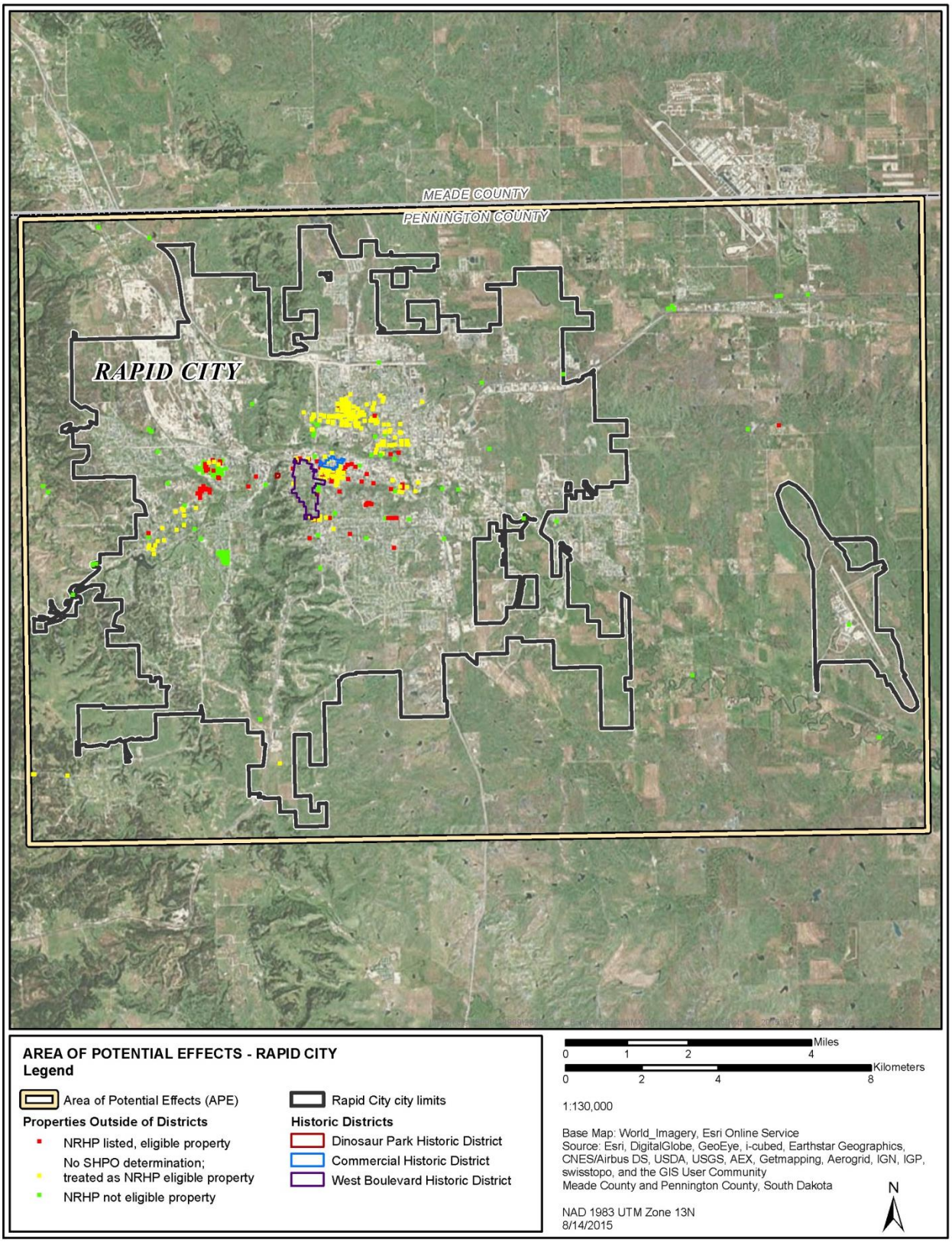


Figure 3.3-2. Area of Potential Effects – Rapid City.

3.3.4 Consultation and Outreach

In May 2012, VA BHHCS initiated consultation under NHPA Sections 106 and 110(f) to consider ways of identifying and avoiding, minimizing, or mitigating potential adverse effects to historic properties, including the Battle Mountain Sanitarium NHL that could result from the reconfiguration proposal. Following publication of the Notice of Intent in the Federal Register on May 16, 2014, which initiated the integrated NEPA/NHPA process to prepare an EIS for the reconfiguration proposal, VA re-engaged the consultation process. SHPO, the Advisory Council for Historic Preservation, the National Park Service, and stakeholders were also formally notified of the integrated process by letter dated May 13, 2014.

The public involvement process, identification of consulting parties, and consultation on historic properties for the integrated NEPA/NHPA process are described in Chapter 6, Public Involvement, Consultation, and Agency Coordination.

3.3.5 Cultural Background, Identified Cultural Resources and Historic Properties

Evidence of human occupation of the Black Hills region corresponds archaeologically to that of Northwest Plains cultures in general, spanning at least the previous 12,000 years (Kornfeld et al. 2010). Archaeological evidence of the human occupation of the current study area in prehistoric times commonly ranges from artifact scatters, lithic reduction sites (workshops), and lithic procurement areas (quarries) to hearths, stone circles, and rock features (cairns), as well as a variety of other archaeological site and feature types (USFS 1996, 2010). The VA Hot Springs campus may contain such common archaeological sites as prehistoric artifact and lithic scatters and historic debris or dump scatters where the land surface is not built up or the grounds not too extensively modified.

The Black Hills region was within the Great Sioux Reservation as the U.S. expanded its western frontiers and territories in the nineteenth century. Conflicts and incursions with prospectors, settlers, and troops through about 1877 ended in the U.S. Army's removal of the Sioux and their allies from the Black Hills. In 1879, Colonel W. J. Thornby staked a primitive claim at a spring on the headwaters of Fall River (City of Hot Springs 2015). Meanwhile, successful mining at Deadwood, about 65 air miles north of present-day Hot Springs, firmly established the Dakota Territory gold fields. Mining traffic also established a wagon route from Deadwood south, passing near the Thornby spring and claim, into Nebraska and the closest railroad access at Sidney (Federal Writers' Project 2006). The town of Hot Springs was developed in the 1880s, with resorts forming around the springs. The federal Battle Mountain Sanitarium was constructed by 1907.

These and other historic properties identified in the APEs are discussed in the following sections. Identification of cultural resources and historic properties within the APEs began with examination of the South Dakota SHPO's Historic Sites Survey files, available through the Cultural Resource Geographic Research Information Display (CRGRID) interface. The CRGRID data were supplemented by examining local and regional studies, and soliciting input from consulting parties on potential cultural resources.

3.3.5.1 Cultural Resources in Hot Springs Area of Potential Effects

CRGRID identified 321 cultural resources previously recorded within the 8.5-square-mile Hot Springs APE (Archaeological Research Center 2015). These resources, listed in Table 3.3-1, include the Battle Mountain Sanitarium NHL and two parks, Centennial Park and Chautauqua Park. Two historic districts in the area contain most of the historic buildings: the Hot Springs Historic District contains 231 buildings and the Log Cabin Tourist Camp District on the north side of the city has another 18 buildings. Figure 3.3-3 shows details of the historic districts within the Hot Springs APE. An individual historic property listed in the NRHP in 2009 is the 1929 dairy barn at the State Veterans Home. The remainder of the buildings at the State Veterans Home and its cemetery are not documented historic properties on record in the SHPO files.

Table 3.3-1. Summary of CRGRID Resources in Hot Springs Area of Potential Effects.

Resource Type	Total Resources	Reviewed[1] for NRHP		
		Listed	Eligible	Not Eligible
Prehistoric Archaeological (5)				
Artifact scatter	4			1
Stone feature (stone circle)	1			
Historic Archaeological (2)				
Artifact scatter	1			
Building/structure remnant	1			1
Combined Historic/Prehistoric Archaeological (2)				
Artifact scatter	2			1
Building, Structure (312)				
Structure and building	310	143	10	157
Park	2		1	1
Total	**321**	**143**	**11**	**161**

[1] Reviewed by SD SHPO for NRHP status.
Source: South Dakota CRGRID (Archaeological Research Center) 2015.

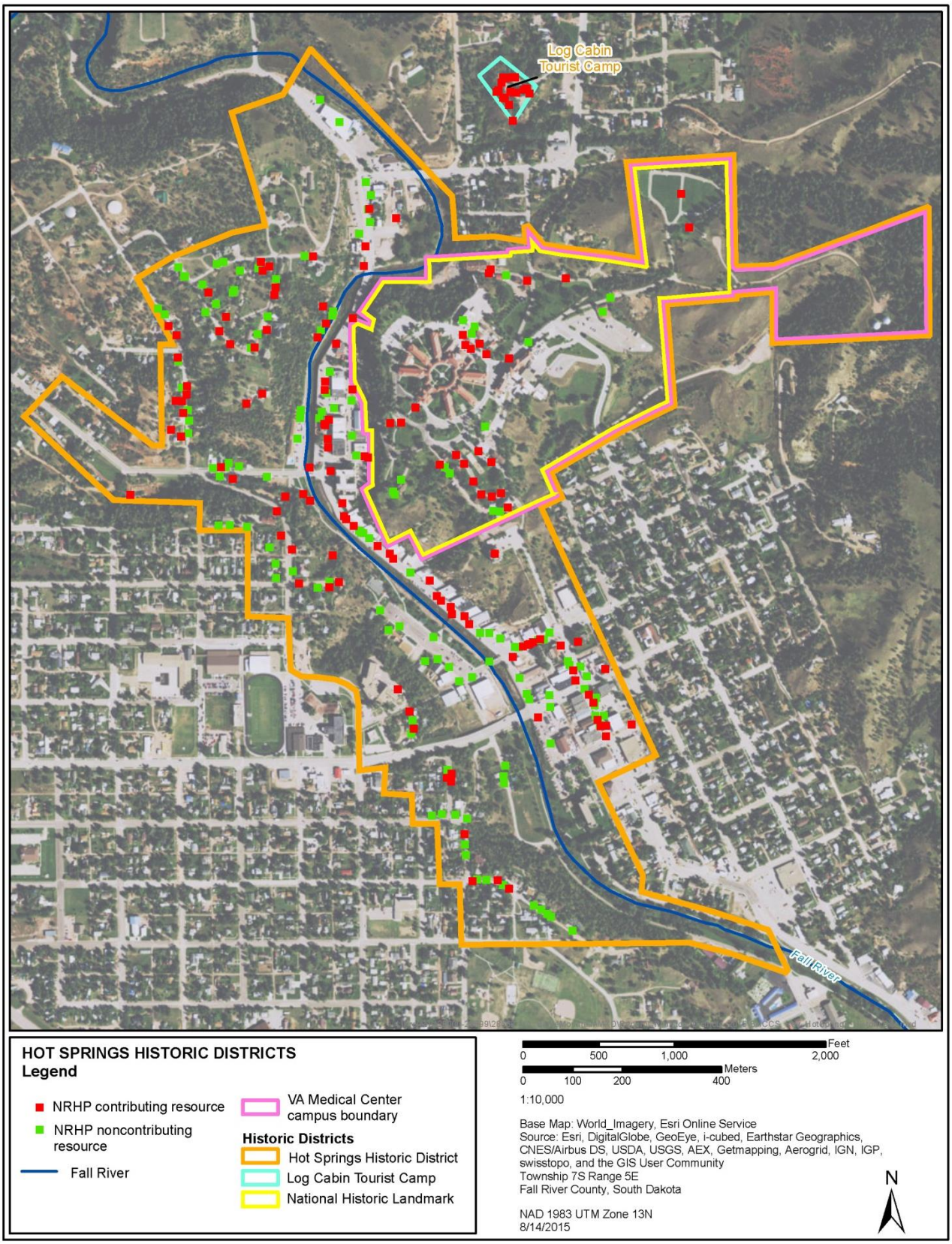


Figure 3.3-3. Historic Districts in Hot Springs Area of Potential Effects.

The Hot Springs APE includes the Battle Mountain Sanitarium NHL, which is discussed in Section 3.3.5.1.2, and a known sacred area to Native American tribes, which is discussed in Section 3.3.5.3. Stone features, such as the stone circle in the Hot Springs APE listed in Table 3.3-1 and cairns at archaeological sites are cultural resources of traditional importance to Native American tribes in the Black Hills region.

A sweat lodge constructed on the VA Hot Springs campus represents the ongoing Native American traditions. Although it is a location for cultural activities, the structure itself is not a cultural resource. The sweat lodge was built in 1993 by the Substance Abuse Residential Treatment program, but is used by non-program patients as well (L. Epperson, email to M. Peters et al., February 10, 2015). Along the lines of traditional practices, various parts of the VA Hot Springs campus have received Native American blessings in recent times. The campus also contains two religious chapels in the traditions of other cultures in American society.

The VA Hot Springs campus and its designed landscape are part of the constructed environment built during the development of the City of Hot Springs after 1880. However, the area surrounding the campus and some undeveloped parts of the campus retain elements of setting persisting from pre-development eras (see Section 3.3.5.3, Regional Cultural Resources), especially where natural areas remain.

3.3.5.1.1 Hot Springs Historic District

In 1881 a group of Deadwood entrepreneurs, including freight wagon operator Fred Evans, formed the Hot Springs Town-Site Company to attract the region's new wealth and visitors to a warm-springs resort on the Fall River in the southern Black Hills (Putz 1974). With two national rail system connections in the Black Hills, continued growth of the Hot Springs region included agricultural settlement, mining services, tourism, and health care (Hufstetler and Bedeau 2007).

Town founder and contractor Evans constructed the railroads' Union Depot building in 1891, and Fall River County erected a new courthouse on River Street near its Fall River crossing. Additional sturdy downtown commercial and institutional buildings followed, most of similar local sandstone (Putz 1974). Evans built the five-story sandstone Evans Hotel in 1892, added a hotel wing in 1893, and built his own house on Summit Avenue. The 1893 sandstone City Hall on River Street, the Public School, and 1895 IOOF (International Order of Odd Fellows) Hall on Chicago Avenue are also from this initial downtown development period. Residential subdivisions extended the city along its Fall River Valley streets with single-family homes typical of the period, built of local stone and wood (Putz 1974).

By the 1970s, preservationists recognized Hot Springs, with the surviving buildings noted above as well as the Battle Mountain Sanitarium of 1907, as significant and representing a Black Hills health spa of the early twentieth century. The SHPO and U.S. Department of the Interior listed downtown and several adjacent neighborhoods (generally the city limits circa 1920) on the NRHP as the Hot Springs Historic District (Putz 1974); see Figure 3.3-4. A complete and recent tally of contributing and noncontributing resources in the Hot Springs Historic District is a pending effort of the city and SHPO (Julin 2010).

Figure 3.3-4. Downtown Hot Springs along River Street.

3.3.5.1.2 Battle Mountain Sanitarium National Historic Landmark

Congress passed legislation in 1902, signed by President Theodore Roosevelt, adding a 10th federal facility to the post-Civil War National Home for Disabled Volunteer Soldiers (NHDVS), the Battle Mountain Sanitarium. The NHDVS in Hot Springs became the first fully equipped hospital among the system's traditional assisted living dormitories and accompanying cemeteries (Julin 2010).

The initial buildings for Battle Mountain Sanitarium were designed by Omaha architect Thomas Rogers Kimball. The associated landscape was designed by Kansas City urban planner George Edward Kessler. Construction was completed in 1907 for the majority of buildings still serving the VA Hot Springs campus. A new Main Hospital was added in 1926 and other improvements were made in the 1930s, following World War II, and through the late twentieth century (Julin 2010).

The Secretary of the Interior designated the Battle Mountain Sanitarium a NHL in July 2011. The buildings and campus are "an outstanding representation of the development of the [NHDVS], the first national system to provide benefits to volunteer soldiers…the only NHDVS branch to be established as an independent medical facility, rather than a residential institution" (Julin 2010). The NHL has 40 contributing buildings, sites, structures, and objects, interspersed with 17 noncontributing buildings and structures.

The NHL is focused on the 12 buildings of the main campus that reflect Kimball's original design (Figures 3.3-5 to 3.3-7). These include the administration building (Building 1) and connected hospital complex of Buildings 2 through 11, most of which are rectangular wards arrayed in a spoke arrangement around a center court, and connected by a circular arcade. A study on the character-defining elements of these buildings conducted in 2012 on behalf of VA concluded that the buildings retain a high degree of historic integrity (Treanor Architects 2012). The exterior of most buildings remain as originally designed, with additions and exterior fire escapes having been added. The interiors of buildings have been remodeled to serve a more contemporary use; however, much of the historic material remains intact. The later additions of wings onto the north and southeast of the 1926 hospital (Building 12) are two of the few major noncontributing components of the NHL (Julin 2010).

Figure 3.3-5. Battle Mountain Sanitarium, Administration Building (Building 1).

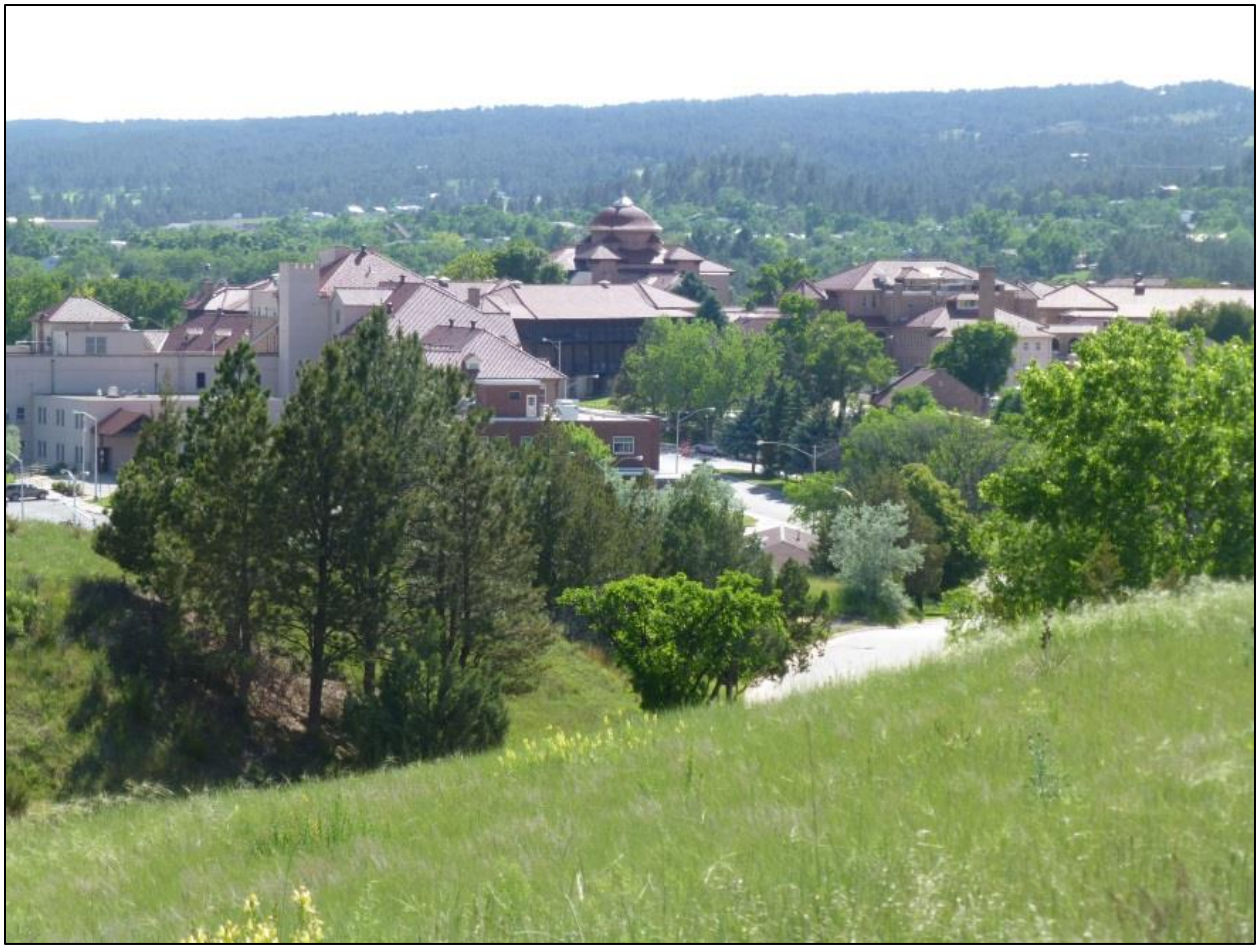


Figure 3.3-6. Westerly Overview of Battle Mountain Sanitarium/VA Hot Springs Campus.

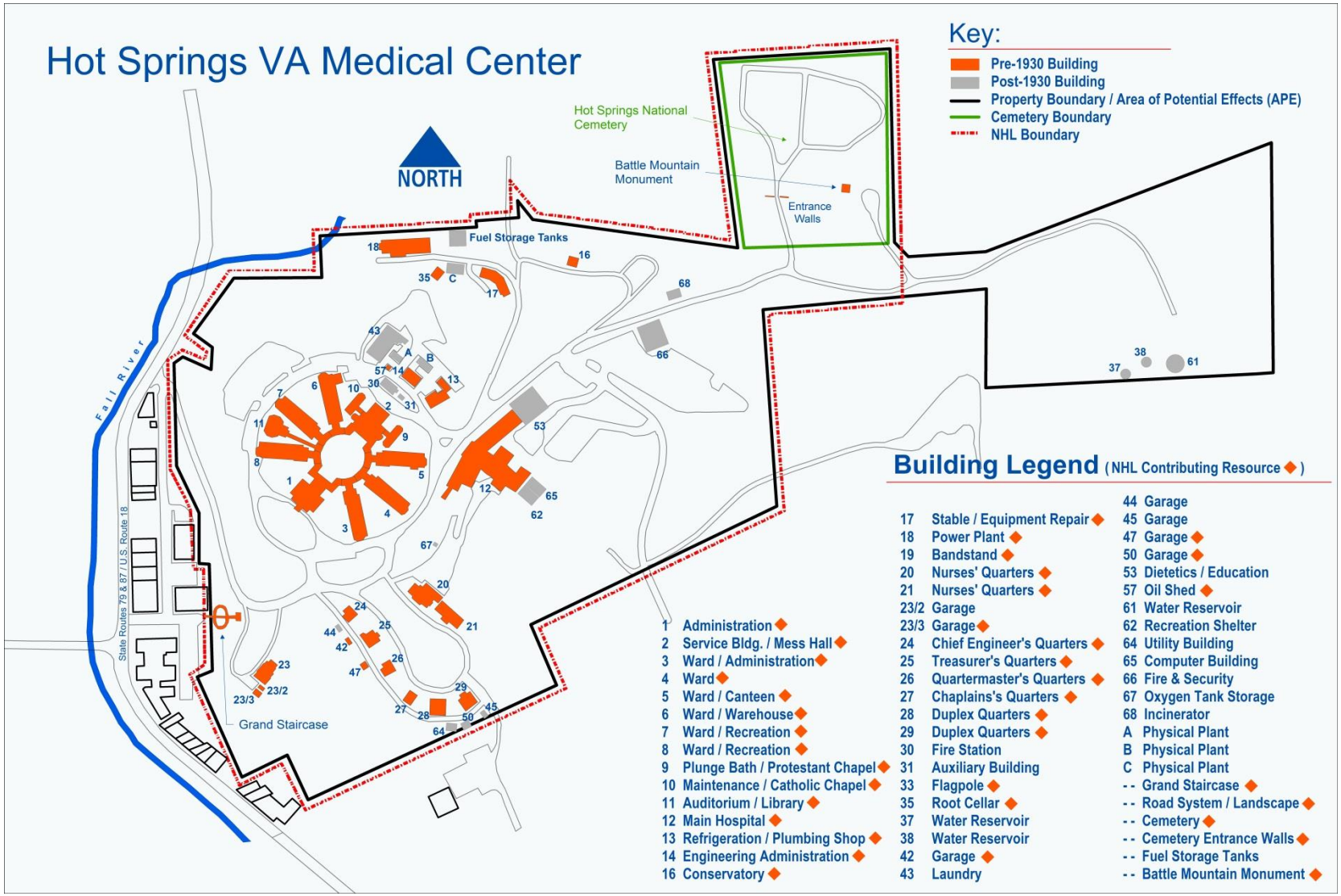


Figure 3.3-7. Battle Mountain Sanitarium National Historic Landmark.

While historically connected to the Battle Mountain Sanitarium as its water supply, the VA-owned spring house on Fall River (Figure 3.3-8) is outside of the NHL boundary and the Hot Springs Historic District. The water source appears as a spring house on Battle Mountain plans as early as 1903 (VA 1903), and is associated with institutional use of the local springs (Federal Writers' Project 2006). The original appearance of the structure over the spring is not known; however, updates include modern shingles, paint, and a security fence. This spring house is eligible for listing in the NRHP.

Figure 3.3-8. VA Spring House near Fall River.

As the first national Veterans care center to serve as an independent medical facility, the Battle Mountain Sanitarium is a place of long-established custom in the health care of generations of Veterans. During public scoping meetings and consultation with consulting parties, the Battle Mountain Sanitarium was recognized as a traditional place of care for the Veteran community. The presence of the Battle Mountain Sanitarium is part of what leads the City of Hot Springs to self-identify as "The Veterans Town". This customary or traditional use makes the Battle Mountain Sanitarium and the VA Hot Springs campus a traditional cultural property to the associated Veteran community (as "traditional cultural property" is defined by National Register Bulleting 38 [Parker and King 1998]). This traditional use is associated with the historic characteristics of feeling and association that make the NHL eligible for NRHP listing.

3.3.5.2 Cultural Resources in the Rapid City Area of Potential Effects

CRGRID identified 1,317 cultural resources located within the 150-square-mile Rapid City APE (Archaeological Research Center 2015). These resources are listed in Table 3.3-2. The historic districts in the APE contain most of the historic buildings. Figure 3.3-9 illustrates historic building and district distributions within the Rapid City APE. Dinosaur Park Historic District is a single historic property. Beyond the districts, another 25 historic properties within the Rapid City APE are listed in the NRHP.

Table 3.3-2. Summary of CRGRID Resources in Rapid City Area of Potential Effects.

Resource Type	Total Resources	Reviewed[a] for NRHP		
		Listed	Eligible	Not Eligible
Prehistoric Archaeological (50)				
Artifact scatter	23		1	13
Isolated artifact	17			17
Stone feature	6			1
Quarry	3			
Village site	1			1
Historic Archaeological (63)				
Building/structure remnant	26			22
Earthwork	9		4	4
Transportation route (road, railroad)	8		6	1
Artifact scatter	6			5
Well/cistern, dam	6			2
Isolated artifact	3			3
Rock art and monument	3			2
Industrial site	1			1
Burial site	1			
Combined Historic/Prehistoric Archaeological (9)				
Artifact scatter	6			2
Rock art	2		1	
Building/structure remnant, stone feature, artifact	1			1
Unknown Period Archaeological (2)				
Stone feature (cairn)	2			1
Building, Structure, and Built Landscape (1,193)				
Structure and building	1,167	467	78	325
Park, landscape structure	26	1	1	16
Total	**1,317**	**468**	**91**	**417**

[a] Reviewed by SD SHPO for NRHP status.
Source: South Dakota CRGRID (Archaeological Research Center 2015.

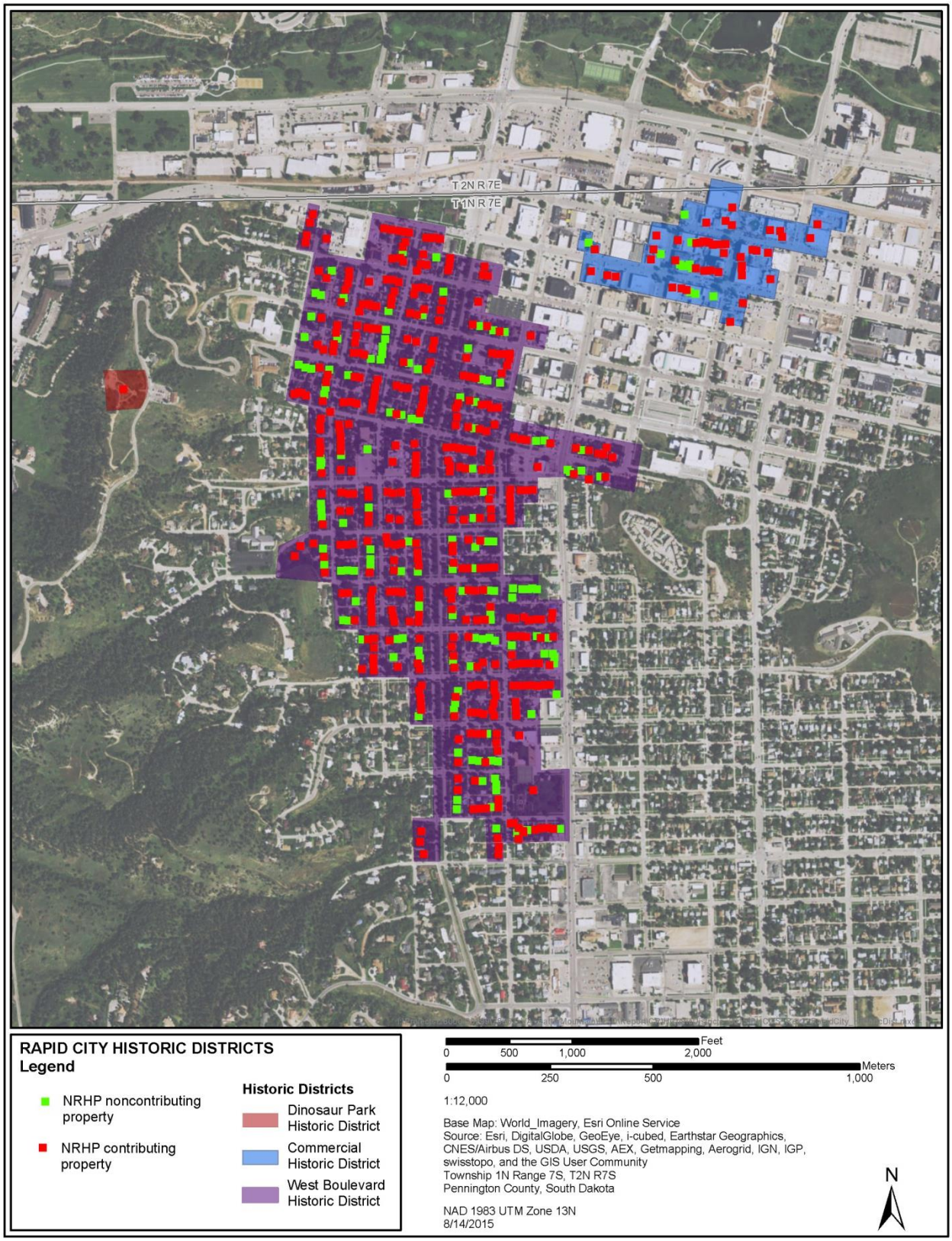


Figure 3.3-9. Historic Districts in Rapid City Area of Potential Effects.

3.3.5.2.1 Commercial Historic District

Listed in the NRHP in 1974 and expanded in 1998, the Commercial Historic District has 57 contributing resources from the late nineteenth through mid-twentieth centuries (Archaeological Research Center 2015).

3.3.5.2.2 West Boulevard Historic District

The West Boulevard Historic District, listed in the NRHP in 1974 and expanded in 1995, is southwest of the Commercial Historic District and has 535 contributing resources over 34 full and 14 partial subdivision blocks of primarily single-family detached residences built between 1900 and 1940 (Archaeological Research Center 2015; Kooiman et al. 1995).

3.3.5.3 Regional Cultural Resources

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). Within the Black Hills region, some higher profile landmarks continue to be well-recognized as specific sacred sites, including the Hot Springs area (Sundstrom 1996). Sundstrom (1996) distinguishes the "traditional or sacred landscapes" of the Black Hills to encompass three kinds of properties: (1) distinctive regions, such as the Black Hills or Bear Lodge Mountains; (2) specific points in the landscape, such as the hot springs or Bear Butte; and (3) kinds or types of places, such as springs and caves. The Hot Springs sacred site ("Minnekahta" to some Siouan peoples) constitutes a general—rather than discretely delimited—location, encompassing the entire area of the Fall River Valley and bounding mountains (the traditional use area) that contains the hot springs proximate to and south of present-day Evans Plunge in the Fall River floodplain within the City of Hot Springs. While Battle Mountain (Figures 3.3-1 and 3.3-10) is not distinctly identified in the ethnographic literature, this landform is recognized by a Siouan name ("He-oki-cize") by at least one nineteenth century source (Hans 1907). One archaeological artifact scatter is recorded on the Battle Mountain prominence (Archaeological Research Center 2015). Historic accounts referring to Battle Mountain tend to tie it to occupation of the Hot Springs area (SD SHPO et al. 1990; Hot Springs Chamber 2010). Sundstrom (1996) notes that the main areas of the Black Hills cultural landscape, including Hot Springs specifically, have a potential for connected traditional properties that are "less prominent [and] not as likely to have been recorded ethnographically," such as additional "high peaks, prominent buttes, springs, caves…." The VA Hot Springs campus is within the Fall River Valley, on the western foot of the Battle Mountain landform, within the vicinity of prominent hot springs locations. Therefore, the VA Hot Springs campus is in the Native American traditional area of the Hot Springs sacred site (Sundstrom 1996), interconnecting with the Battle Mountain landform. 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.

Figure 3.3-10. View of Battle Mountain Land Mass from the VA Hot Springs Campus.

The Black Hills region and its features are traditionally important to a number of Northwest Plains tribes. In addition to the Sioux (Lakota, Dakota, and Nakota), these tribes include the Cheyenne, Arapaho, and Kiowa, as well as potentially the Ponca, Mandan, and other tribes with connections to the greater Northwest Plains culture area (Sundstrom 1996; Phillips et al. 2013). Sioux tribes retain historic claim to the Black Hills in U.S. treaty negotiations, first with the 1851 Treaty of Fort Laramie and then reiterated in the 1868 Treaty of Fort Laramie (Phillips et al. 2013). The list of tribes contacted for consultation is included in Appendix C.

Despite recent development and historic construction, there could be archaeological sites or materials that represent important connections to the traditional use of the Hot Springs/Battle Mountain area or the Black Hills. Archaeological sites or materials could exist on the VA Hot Springs campus or at locations yet to be identified in Hot Springs and Rapid City where construction could occur under the reconfiguration alternatives. Existing cultural resource site records (see Sections 3.3.5.1 and 3.3.5.2) indicate potential sites or materials include rock art, stone circles, and cairns. Locations for any construction or modification would receive phased review (see Section 3.3.6).

3.3.6 Phased Identification and Evaluation of Historic Properties

Certain alternatives could result in construction or renovation of additional VA facilities in Hot Springs and Rapid City, or cause ground-disturbing activities that could expose archaeological sites or features at the VA Hot Springs campus or yet to be identified locations. VA would continue phased identification and evaluation of historic properties when any specific locations for future construction are determined.

Phased review of new development locations is subject to identification and evaluation of cultural resources and historic properties pursuant to federal NEPA and NHPA Section 106 regulations (40 CFR 1502.16(g) and 36 CFR 800.4). Any discovery of historic properties during new development actions would be addressed under the Section 106 process pursuant to 36 CFR 800.13 (Post-Review Discoveries) and under NEPA pursuant to 40 CFR 1502.9(c).

3.4 Geology and Soils

Geological resources consist of surface and subsurface materials. Within a given physiographic province, geologic resources are described in terms of topography and physiography, geology, soils, and, where applicable, geologic hazards.

Topography and physiography relate to the shape and arrangement of a land surface, including elevation and the position of natural and human-made features.

Geology is the study of the physical and dynamic history of the Earth and provides information on the structure and configuration of surface and subsurface features. Geologic data are based on field observations of the surface and borings to identify subsurface composition.

Soils are the unconsolidated materials overlying bedrock or other parent material. Soils are described by their type, slope, and physical characteristics. In some cases, soil properties must be examined for their compatibility with particular construction activities or types of land use.

3.4.1 Regulatory and Policy Framework

The *Clean Water Act*, described further in Section 3.5.1, includes provisions that regulate soil erosion and stormwater runoff to navigable waters. The applicability of the Act to the proposed project is described in greater detail in Section 3.5, Hydrology and Water Quality.

The *Earthquake Hazards Reduction Act* was enacted to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." The act established the National Earthquake Hazards Reduction Program, led by the Federal Emergency Management Agency.

Executive Order 12699, *Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction* (1990), requires federal agencies to ensure that buildings (including both new construction and leases) are designed and constructed in accordance with appropriate seismic design and construction standards.

Executive Order 12941, *Seismic Safety of Existing Federally Owned or Leased Buildings* (1994), adopted standards for assessing the seismic safety of owned and leased buildings and mitigating unacceptable seismic risks in those buildings.

The International Building Code provides minimum standards to protect the public safety, health, and welfare in regards to building construction. The Code was developed to consolidate existing building codes into one uniform code, and includes specifications related to soils and foundations.

VA Directive 7512, *Seismic Safety of VA Buildings*, establishes policy regarding the seismic safety of VA buildings and incorporates requirements established by Executive Orders 12699 and 12941.

3.4.2 Current Conditions

3.4.2.1 Regional Geology and Seismicity

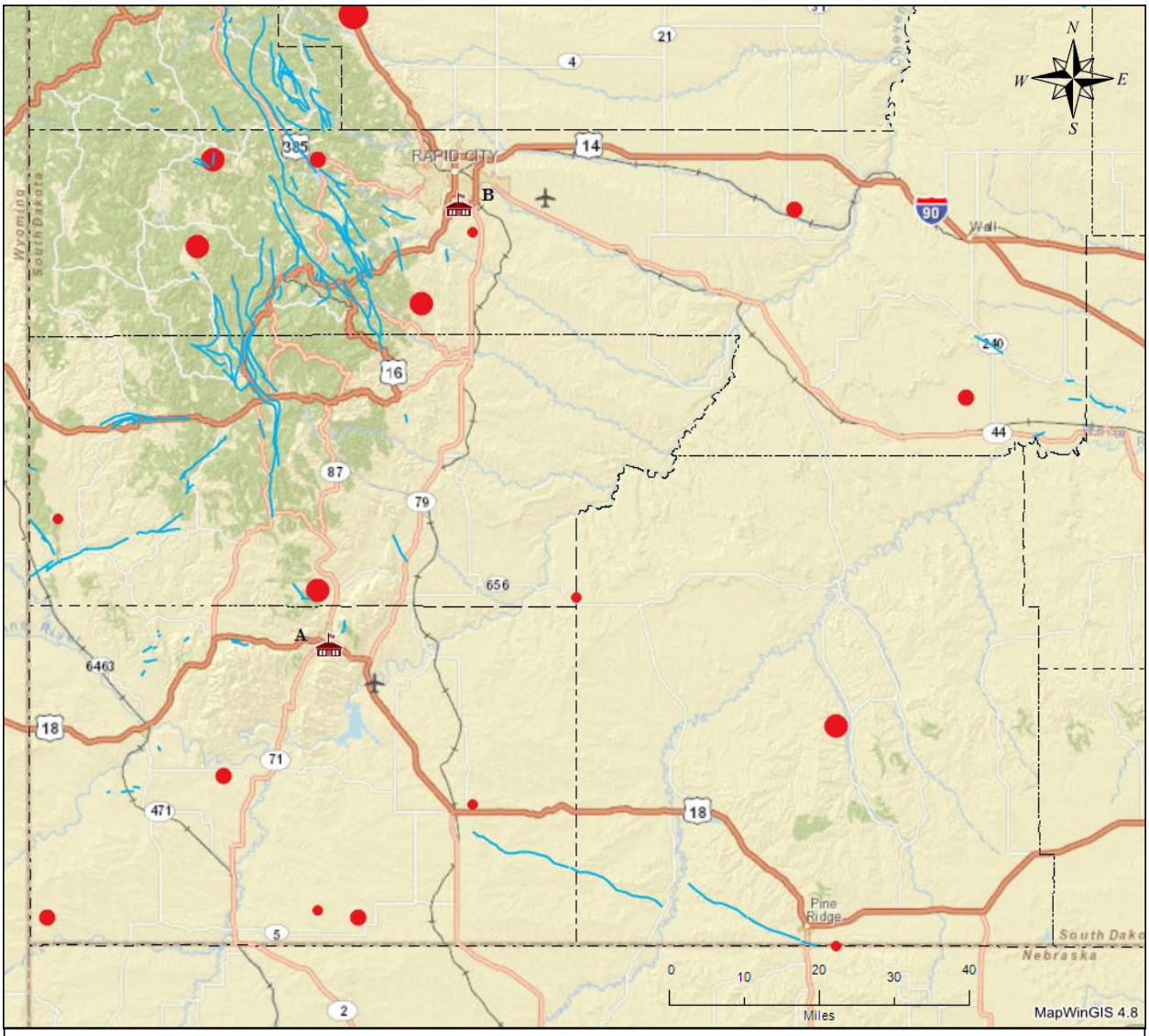
The Hot Springs and Rapid City areas are located near the border of the Pierre Hills and Black Hills physiographic divisions of the Great Plains province (SDGS n.d.). The Pierre Hills division consists of a series of smooth hills and ridges with rounded tops. This region is underlain by the Pierre shale formations and has lower elevations than the plateau country to the north and south (Malo 1997). The Black Hills division is a mountainous area consisting of a series of upturned sedimentary strata (hogbacks), arranged concentrically around a core of igneous and metamorphic rocks (Malo 1997).

Peak ground accelerations—an indicator of seismic event effects—in southwestern South Dakota are relatively low (two percent probability over 50 years of exceeding approximately 0.06 to 0.14 times the standard acceleration of gravity) (USGS 2014a). The region has a history of earthquakes ranging in intensity, as measured on the Modified Mercalli Intensity Scale (see Table 3.4-1), from III to VI (USGS 2007), with the more intense earthquakes and the majority of faults located within the Black Hills division. Figure 3.4-1 depicts the regional locations of earthquakes and faults.

Table 3.4-1. Modified Mercalli Intensity Scale.

Intensity	Shaking	Description/Damage
I	Not felt	Not felt except by a very few under especially favorable conditions.
II	Weak	Felt only by a few persons at rest, especially on upper floors of buildings.
III	Weak	Felt quite noticeably by persons indoors, especially on upper floors of buildings. Many people do not recognize it as an earthquake. Standing motor cars may rock slightly. Vibrations similar to the passing of a truck. Duration estimated.
IV	Light	Felt indoors by many, outdoors by few during the day. At night, some awakened. Dishes, windows, doors disturbed; walls make cracking sound. Sensation like heavy truck striking building. Standing motor cars rocked noticeably.
V	Moderate	Felt by nearly everyone; many awakened. Some dishes, windows broken. Unstable objects overturned. Pendulum clocks may stop.
VI	Strong	Felt by all, many frightened. Some heavy furniture moved; a few instances of fallen plaster. Damage slight.
VII	Very Strong	Damage negligible in buildings of good design and construction; slight to moderate in well-built ordinary structures; considerable damage in poorly built or badly designed structures; some chimneys broken.
VIII	Severe	Damage slight in specially designed structures; considerable damage in ordinary substantial buildings with partial collapse. Damage great in poorly built structures. Fall of chimneys, factory stacks, columns, monuments, walls. Heavy furniture overturned.
IX	Violent	Damage considerable in specially designed structures; well-designed frame structures thrown out of plumb. Damage great in substantial buildings, with partial collapse. Buildings shifted off foundations.
X	Extreme	Some well-built wooden structures destroyed; most masonry and frame structures destroyed with foundations. Rails bent.

Source: USGS 2014b.



Legend

A – VAMC – Hot Springs
B – CBOC – Rapid City
Mercalli Intensity
III IV V VI
Faults

Projection: WGS84 Web Mercator (Auxiliary Sphere)
Source: SDGS 2013 and USGS 2007.
Basemap Source: ArcGIS Online World Street Map, 2014.

Figure 3.4-1. Earthquakes and Faults in the Hot Springs and Rapid City Areas.

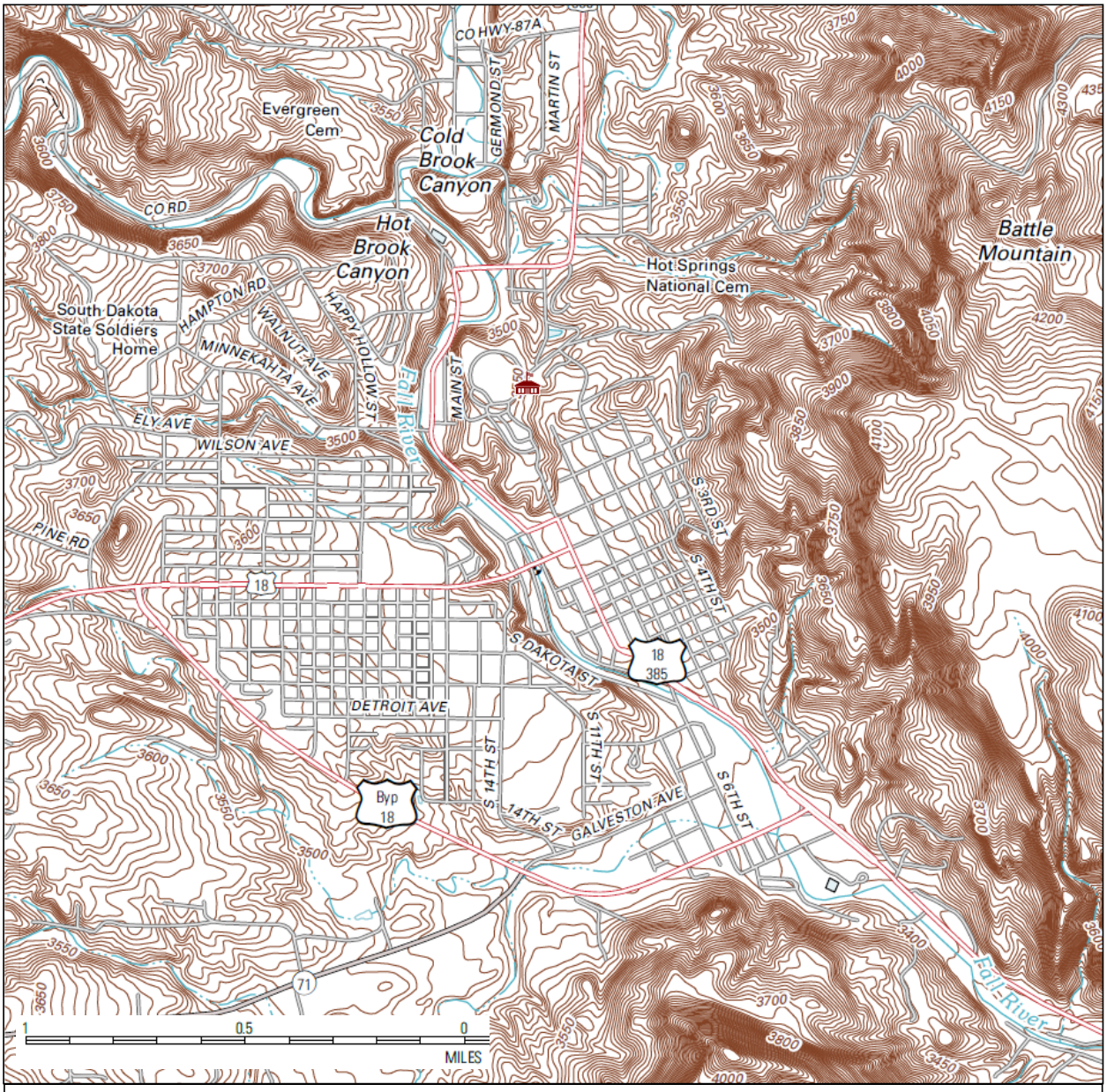
3.4.2.2 Hot Springs Area Topography and Soils

Topography in the Hot Springs, SD, area ranges from gently sloping (central city area) to severely sloped (mountainous areas surround the city), and generally slopes toward Fall River in the center of the city (see Figure 3.4-2).

The following geologic units are present in the Hot Springs area (see Figure 3.4-3) (USGS 2007):

- Jms
  - Morrison Formation (Late Jurassic): Light-gray to green and variegated red, brown, yellow, or lavender, siliceous claystone, shale, and siltstone containing interbedded sandstone and fresh-water limestone lenses. Thickness up to 150 feet (46 meters).
  - Unkpapa Sandstone (Late Jurassic): White, massive to thin-bedded, fine-grained, argillaceous sandstone. May be variegated to banded red, yellow, brown, or lavender. Thickness up to 267 feet (81 meters).
  - Sundance Formation (Late to Middle Jurassic): Greenish-gray, yellow, tan, red to orange, and white, variegated, interbedded, fine- to coarse-grained sandstone, siltstone, clay, and limestone. Thickness 250 to 350 feet (76 to 107 meters).
  - Gypsum Springs Formation (Middle Jurassic): Massive white gypsum and minor maroon siltstone and shale. Thickness up to 40 feet (12 meters).
- Pmo
  - Minnekahta Limestone: Purple to gray, finely crystalline, thin- to medium-bedded limestone with varying amounts of red shale. Thickness 30 to 50 feet (9 to 15 meters).
  - Opeche Shale: Red siltstone, argillaceous sandstone and shale interbedded with caliche layers. Thickness 85 to 130 feet (26 to 40 meters).
- PPm – Minnelusa Formation: Variegated, yellow to red, gray to brown, pink to purple, and black, interbedded sandstone, siltstone, shale, limestone, dolomite, calcarenite, chert, and brecciated beds. Thickness 394 to 1,175 feet (120 to 358 meters).
- Qal – Alluvium: Clay to boulder-size clasts with locally abundant organic material. Thickness up to 75 feet (23 meters).
- Qt – Terrace Deposits: Clay to boulder-size clasts deposited as pediments, paleochannels, and terrace fills of former flood plains. Thickness up to 75 feet (23 meters).
- TrPs – Spearfish Formation: Red sandy shale, siltstone, sandstone, and minor limestone. Interbedded with abundant gypsum. Thickness 328 to 559 feet (100 to 170 meters).

Hot Springs area is primarily urban with little to no agricultural activity. No land within the city limits is designated as prime farmland. In 1980, about 12,000 acres in Fall River County, or about 1 percent of the total acreage, met the requirements for prime farmland. All of this acreage was used for irrigated crops, mainly corn and alfalfa (USDA 1982).

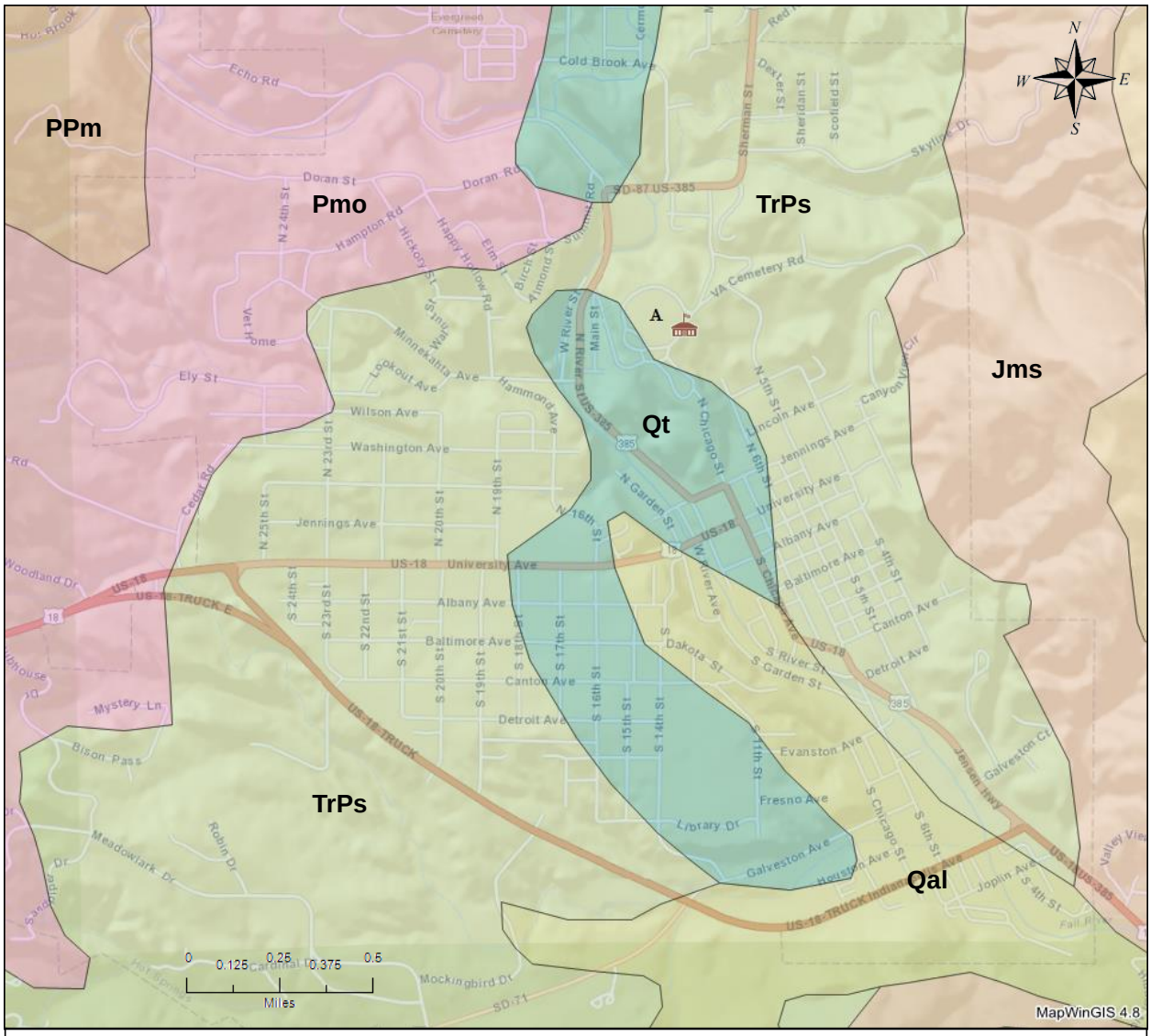


Legend

VAMC – Hot Springs

Basemap Source: Hot Springs Quadrangle, 7.5-Minute Series. USGS 2012a.
Contour Interval = 10 feet

Figure 3.4-2. Topography: Hot Springs, SD.



Legend

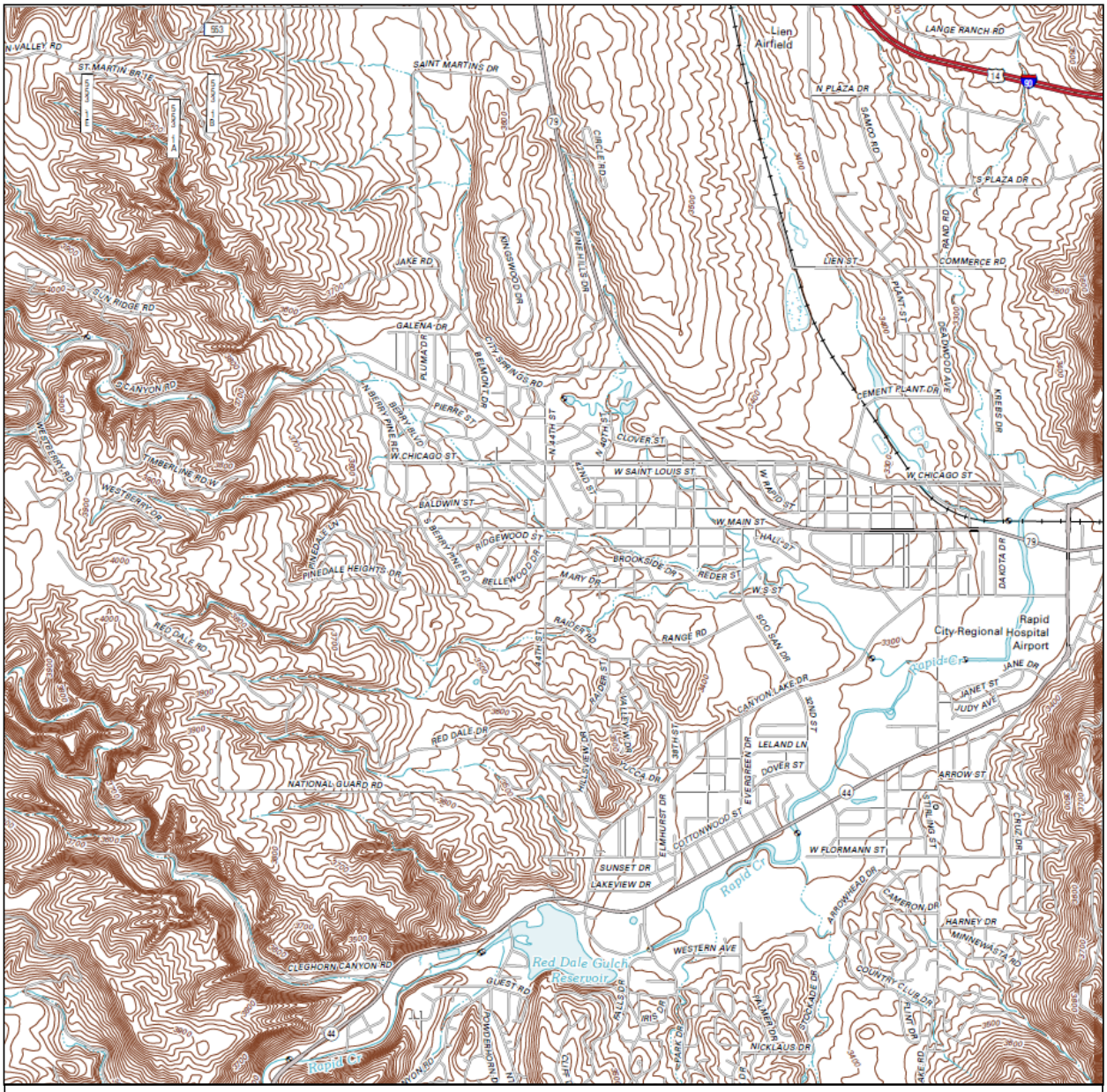
A – VAMC – Hot Springs

Projection: WGS84 Web Mercator (Auxiliary Sphere)
Source: USGS 2007.
Basemap Source: ArcGIS Online World Street Map, 2014.

Figure 3.4-3. Geologic Units, Hot Springs, SD.

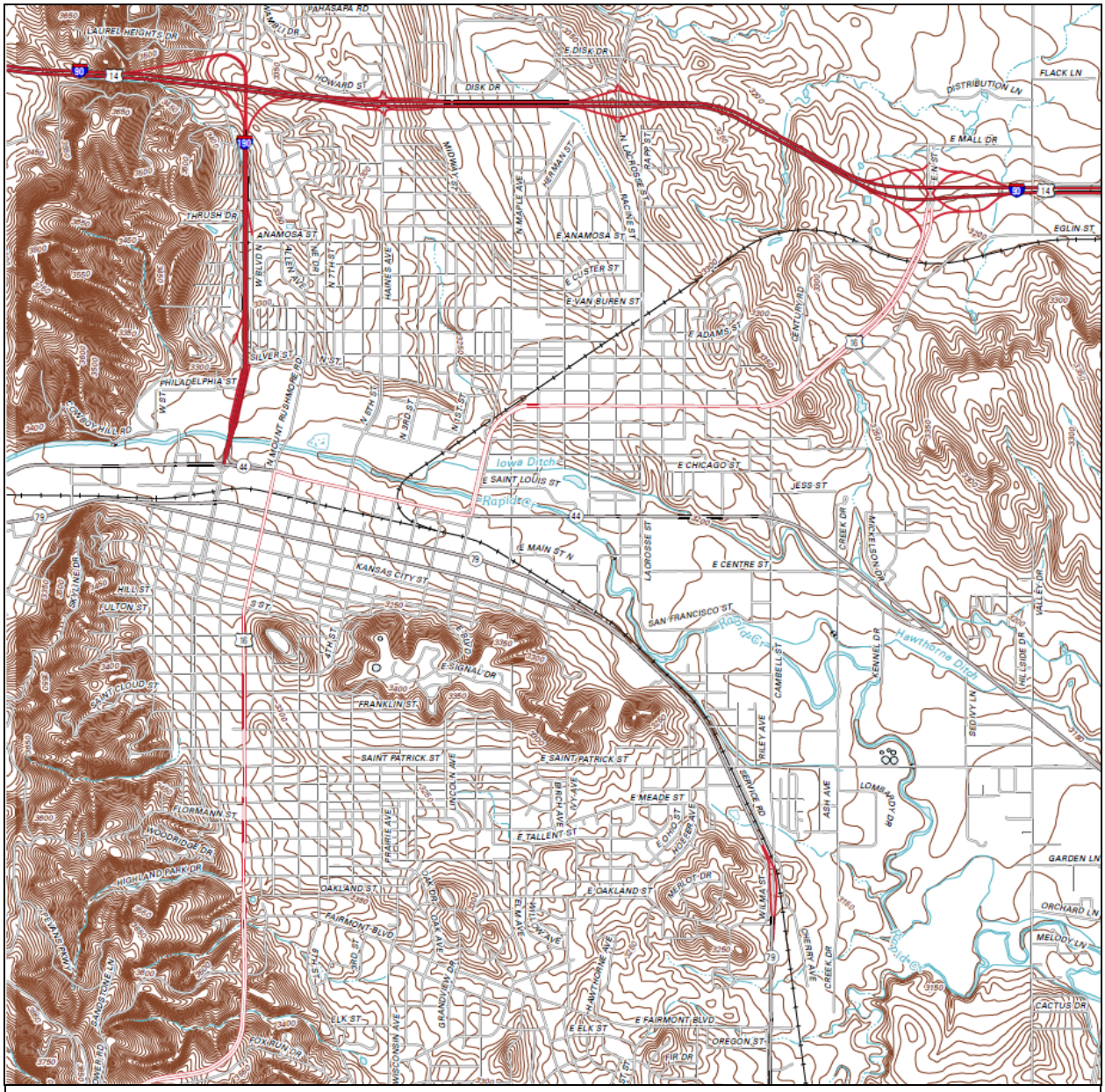
3.4.2.3 Rapid City Area Topography and Soils

Topography in the Rapid City, SD, area ranges from gently sloping (central and eastern city area) to moderately sloped (ridge separating the western and eastern city areas), and generally slopes toward Rapid Creek in the center of the city (see Figures 3.4-4 and 3.4-5).



Basemap Source: Rapid City West Quadrangle, 7.5-Minute Series. USGS 2012b.
Contour Interval = 20 feet

Figure 3.4-4. Topography: Rapid City, SD (west).



Legend

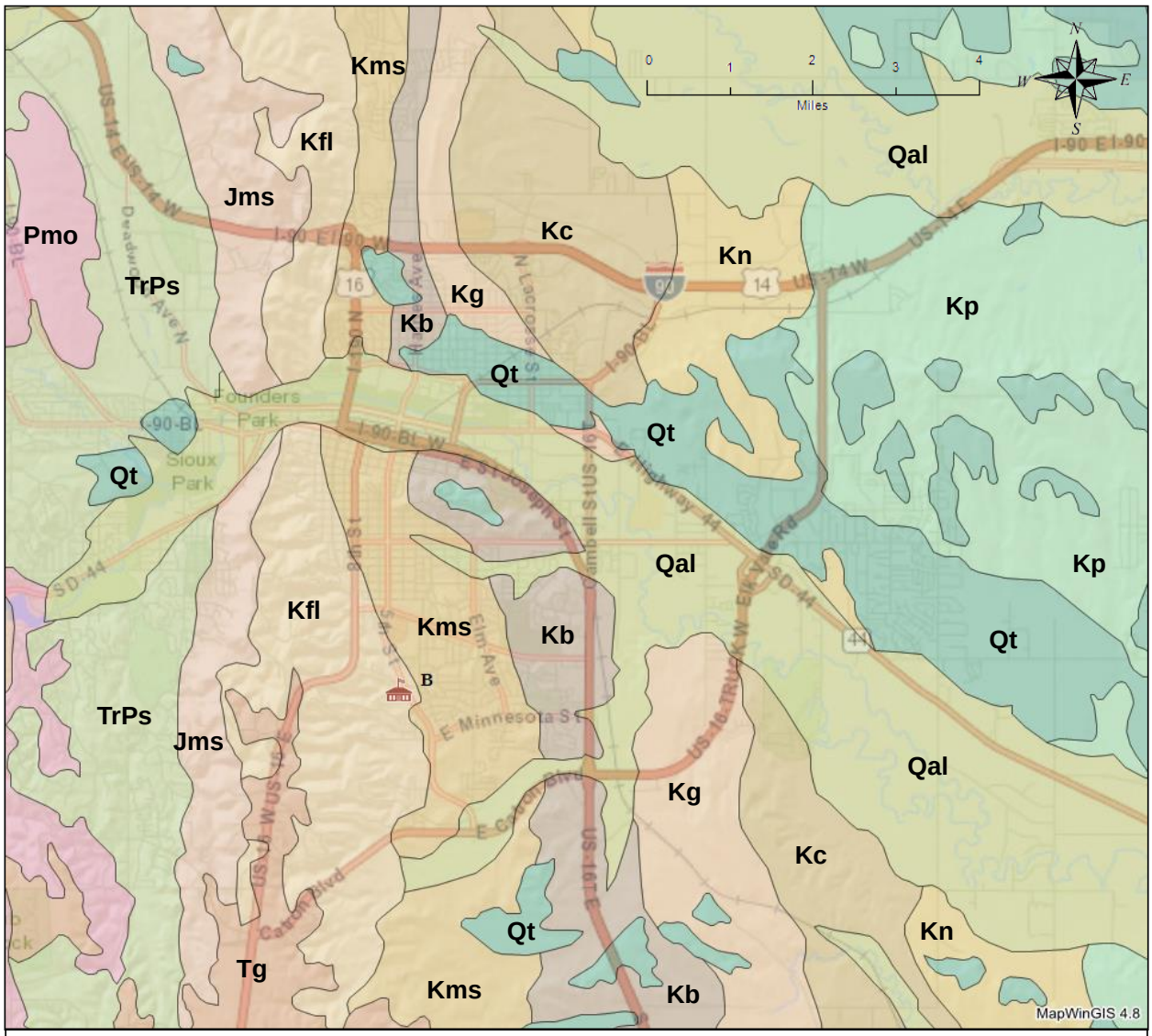
CBOC – Rapid City

Basemap Source: Rapid City East Quadrangle, 7.5-Minute Series. USGS 2012c.
Contour Interval = 10 feet

Figure 3.4-5. Topography: Rapid City, SD (east).

The following geologic units are present in the Rapid City area (see Figure 3.4-6) (USGS 2007):

- Jms
  - Morrison Formation (Late Jurassic): Light gray to green and variegated red, brown, yellow, or lavender, siliceous claystone, shale, and siltstone containing interbedded sandstone and fresh-water limestone lenses. Thickness up to 150 feet (46 meters).
  - Unkpapa Sandstone (Late Jurassic): White, massive to thin-bedded, fine-grained, argillaceous sandstone. May be variegated to banded red, yellow, brown, or lavender. Thickness up to 267 feet (81 meters).
  - Sundance Formation (Late to Middle Jurassic): Greenish-gray, yellow, tan, red to orange, and white, variegated, interbedded, fine- to coarse-grained sandstone, siltstone, clay, and limestone. Thickness 250 to 350 feet (76 to 107 meters).
  - Gypsum Springs Formation (Middle Jurassic): Massive white gypsum and minor maroon siltstone and shale. Thickness up to 40 feet (12 meters).
- Kb – Belle Fourche Shale: Dark gray to black bentonitic shale containing minor limestone lenses, bentonite layers, fossiliferous calcarenite, and large, ferruginous, carbonate concretions. Thickness 150 to 350 feet (46 to 107 meters).
- Kc – Carlile Shale: Dark gray to black, silty to sandy shale with several zones of septarian, fossiliferous, carbonate concertions. Contains up to three sandstone beds near the middle of the formation and sandy calcareous marl at the base. Thickness 345 to 620 feet (105 to 189 meters).
- Kfl (Inyan Kara Group)
  - Fall River Formation: Variegated brown, red, gray to purple, calcareous, well-sorted, fine-grained sandstone, siltstone, and shale containing mica flakes. Thickness 100 to 200 feet (30 to 61 meters).
  - Lakota Formation: Yellow, brown, red-brown, gray to black silty shale, pebble conglomerate, and massive to thin-bedded, cross-bedded sandstone. Locally interbedded with fresh-water limestone and bituminous coal beds. Thickness 35 to 500 feet (11 to 152 meters).
- Kg – Greenhorn Formation: Gray shale, mudstone, marl, calcarenite, and shaley limestone grading upward into light gray to tan, alternating marl and thin-bedded, fossiliferous limestone. Thickness 225 to 315 feet (69 to 96 meters).
- Kms
  - Mowry Shale: Black to gray, siliceous, fissile shale and siltstone containing bentonite layers, and sparse sandstone dikes and sills. Thickness 125 to 250 feet (38 to 76 meters).
  - Newcastle Sandstone: Gray, light-brown to yellow, discontinuously distributed siltstone, claystone, sandy shale, and fine-grained sandstone. Thickness up to 290 feet (88 meters).
  - Skull Creek Shale: Dark gray to blueish-gray shale containing ferruginous, and carbonate concretions. Thickness 150 to 275 feet (46 to 84 meters).



Legend

B – CBOC – Rapid City

Projection: WGS84 Web Mercator (Auxiliary Sphere)
Source: USGS 2007.
Basemap Source: ArcGIS Online World Street Map, 2014.

Figure 3.4-6. Geologic Units: Rapid City, SD.

- Kn – Niobrara Formation: White to dark gray argillaceous chalk, marl, and shale. Weathers yellow to orange. Contains thin, laterally continuous bentonite beds, chalky carbonaceous shale, minor sand, and small concretions. Thickness 160 to 225 feet (49 to 69 meters).
- Kp – Pierre Shale: Blue-gray to dark gray, fissile to blocky shale with persistent beds of bentonite, black organic shale, or light-brown chalky shale. Contains minor sandstone, conglomerate, and abundant carbonate and ferruginous concretions. Thickness 1,000 to 2,700 feet (305 to 823 meters).

- Pmo
  - Minnekahta Limestone: Purple to gray, finely crystalline, thin- to medium-bedded limestone with varying amounts of red shale. Thickness 30 to 50 feet (9 to 15 meters).
  - Opeche Shale: Red siltstone, argillaceous sandstone and shale interbedded with caliche layers. Thickness 85 to 130 feet (26 to 40 meters).
- Qal – Alluvium: Clay to boulder-size clasts with locally abundant organic material. Thickness up to 75 feet (23 meters).
- Qt – Terrace Deposits: Clay to boulder-size clasts deposited as pediments, paleochannels, and terrace fills of former flood plains. Thickness up to 75 feet (23 meters).
- Tg – Gravel Deposits: Clay to boulder-size clasts primarily from igneous and metamorphic rocks of the central Black Hills. Also includes Phanerozoic lithic clasts and rare vertebrate fossils. Thickness up to 60 feet (18 meters).
- TrPs – Spearfish Formation: Red sandy shale, siltstone, sandstone, and minor limestone. Interbedded with abundant gypsum. Thickness 328 to 559 feet (100 to 170 meters).

Rapid City is primarily urban with little to no agricultural activity. No land within the city limits is designated as prime farmland.

3.5 Hydrology and Water Quality

The hydrologic setting of a project includes both surface water and groundwater, and the quantity and quality of each. Local climates are also useful in describing and understanding the local hydrologic setting. While related to hydrology, floodplains and wetlands are discussed separately Section 3.9.

Surface water resources typically consist of rivers, streams, lakes, and wetlands. Groundwater consists of subsurface hydrologic resources, and is an essential resource that functions to recharge surface water and is often used for potable water consumption, agricultural irrigation, and industrial applications. Surface water and groundwater resources are important contributors to the economic, ecological, recreational, and human health of a region.

3.5.1 Regulatory Framework

3.5.2.1 Clean Water Act

The *Clean Water Act of 1977* gave the U.S. EPA the authority to set effluent standards on an industry-by-industry basis, and continued the requirements to set water quality standards for contaminants in surface waters by requiring each state to adopt water quality standards for receiving water bodies (Section 303). The Act requires the discharge of any pollutant from point sources into navigable waters to be authorized by a permit obtained under the NPDES (Section 402). The NPDES establishes limits on specific pollutants in order to restore and maintain the chemical, physical, and biological integrity of the surface water resource. The NPDES also regulates discharge of non-point sources of water pollution, such as stormwater.

Section 303 of the *Clean Water Act* requires states to adopt water quality standards for all surface waters based on the designated beneficial use. The SDDENR received EPA approval of their 2014 Integrated Report, identifying impaired water bodies within South Dakota that require water quality standards.

Section 404 of the *Clean Water Act* regulates the discharge of dredge or fill material into waters of the U.S., which includes wetlands (see Section 3.9).

3.5.2.2 Energy Independence and Security Act

In 2007, the *Energy Independence and Security Act* was passed, which in part (Section 438) established new stormwater design requirements for federal development and redevelopment projects to reduce the impacts of stormwater runoff. Specifically, construction projects that disturb more than 5,000 square feet must maintain or restore the predevelopment hydrology to the maximum extent technically feasible with respect to temperature, rate, volume, and duration of flow.

3.5.2 Current Conditions

South Dakota has 14 major river basins, most of which drain into the Missouri River. The Hot Springs and Rapid City areas lie within the Upper Cheyenne River Basin (SDDENR 2014). Hot Springs is located in the Fall River subwatershed, within the Fall River watershed (hydrologic unit 101201090105) (USGS 2009).

The VA Hot Springs campus contains both impervious surfaces (which allow little infiltration of precipitation into the soil and generate higher levels of runoff) and landscaped areas. Surface runoff of stormwater is generally in a westerly direction toward Fall River, which runs through Hot Springs. The annual mean flow in Fall River through Hot Springs is 24.2 cubic feet per second (USGS 2014a). Fall River is designated as an impaired water due to stream temperature exceedances for the coldwater permanent fish life beneficial use (SDDENR 2014). The watershed contains highly erodible soils. VA holds a surface water discharge system general permit (permit number SDG860037) authorizing the discharge of water from water treatment and/or distribution system activities to Fall River and includes monitoring and sampling requirements (SDDENR 2010).

The majority of Rapid City is located in the Cyclone Ditch-Rapid Creek subwatershed, within the Middle Rapid Creek watershed (hydrologic unit 101201100204) (USGS 2009). Primarily impervious surfaces surround the Rapid City CBOC. Surface runoff of stormwater is generally in an easterly direction towards Rapid Creek, which runs through Rapid City. The annual mean flow in Rapid Creek through Rapid City is 69.5 cubic feet per second (USGS 2014b). Rapid Creek is designated as an impaired water due to *Escherichia coli* and fecal coliform exceedances for the immersion recreation beneficial use (SDDENR 2014). The watershed contains highly erodible soils.

The availability of groundwater resources in the project area is influenced by many factors including location, local recharge and groundwater flow conditions, and structural features. The major confined aquifers in the project area are (from shallowest to deepest) the Inyan Kara, Minnekahta, Minnelusa, Madison, and Deadwood aquifers (USGS 2003). Groundwater quality is generally good with limitations related to aesthetic qualities associated with hardness and high concentrations of chloride, sulfate, sodium, manganese, and iron; very few health-related limitations exist (USGS 2003). Each of the aquifers is described below, based on information in USGS (2003).

- Shallow unconfined aquifer: Both the Hot Springs and Rapid City areas are underlain by a shallow unconfined aquifer. These alluvial deposits are generally adjacent to streams in the floodplain and readily yield water to wells.
- Inyan Kara Aquifer: The uppermost confined aquifer is the Inyan Kara aquifer, which lies below the Rapid City area, but is absent below the Hot Springs area. The depth to the top of this group below the Rapid City area ranges from less than 200 feet (outcrop in central Rapid City) to 2,000 feet.
- Minnekahta Aquifer: The Minnekahta aquifer lies below both the Hot Springs and Rapid City areas. The depth to the top of this group below the Rapid City area ranges from less than 200 feet (outcrop on the western side of Rapid City) to 3,500 feet. The depth to the top of this group below the Hot Springs area is 200 to 400 feet.
- Minnelusa Aquifer: The Minnelusa aquifer lies below both the Hot Springs and Rapid City areas. The depth to the top of this group below the Rapid City area ranges from less than 200 feet to 3,500 feet. The depth to the top of this group below the Hot Springs area is 200 to 400 feet.
- Madison Aquifer: The Madison aquifer lies below both the Hot Springs and Rapid City areas. The depth to the top of this group below the Rapid City area ranges from 600 feet to 4,000 feet. The depth to the top of this group below the Hot Springs area is 1,000 to 1,500

feet. The Madison aquifer returns the highest average well yields and temperatures are generally the warmest of the major aquifers.

- Deadwood Aquifer: The Deadwood aquifer lies below both the Hot Springs and Rapid City areas. The depth to the top of this group below the Rapid City area ranges from 1,000 feet to 4,500 feet. The depth to the top of this group below the Hot Springs area is 1,000 to 1,500 feet.

Hot Springs is known for the warm mineral springs found in the region. Initially settled in 1879 as Minnekahta (a Lakota Sioux word meaning Hot Water), the settlement was renamed Hot Springs in 1882. In 1890, Evans Plunge (an indoor pool fed by the natural springs) was constructed; the facility remains a local attraction today.

3.6 Wildlife and Habitat

This section describes the biological resources within the proposed project area. Biological resources include wildlife and plants and the habitats in which they exist. Habitat may be described in terms of ecological regions, or ***ecoregions***, which are geographical areas with similar climate and landforms, containing a variety of ecosystems characterized by their plant and animal communities and abiotic conditions, such as climate, soils, and elevation. Ecoregions are described at varying scales, using a Roman numeral classification scheme. Level I is the largest scale, dividing North America into 15 ecoregions. Levels II and III further divide the continent into 50 and 85 subregions, respectively, while further subdivisions (Level IV) includes hundreds of subregions. This discussion focuses on the subregions identified at the Level III and Level IV scale.

3.6.1 Regulatory and Policy Framework

The *Endangered Species Act* of 1973, as amended, is federal legislation that is intended to conserve the ecosystems upon which endangered and threatened species depend and provide programs for the conservation of those species, thus preventing extinction of plants and animals. The law is administered by the Department of the Interior's Fish and Wildlife Service (FWS) and, for marine resources, the Commerce Department's National Oceanic and Atmospheric Administration. Section 4 of the *Endangered Species Act* addresses the listing and recovery of species and designation of critical habitat, which is a designated geographic area that contains feature essential for the conservation of a threatened or endangered species. Section 7 requires all federal agencies to ensure that any action they authorize, fund, or implement is not likely to jeopardize the continued existence of a federally protected species or result in destruction or adverse modification of its designated critical habitat. Section 9 prohibits the unauthorized "take" of federally protected species, which includes harassment, harm, pursuit, hunting, shooting, wounding, killing, trapping, capture, or collection of a protected species, or the attempt to engage in any such conduct. Federally protected species fall under one of two classifications:

- Endangered species are in danger of extinction throughout all or a significant portion of their range.
- Threatened species are likely to become endangered within the foreseeable future.

A species that is being considered by the FWS for protection as either endangered or threatened is described as "proposed" if a proposed regulation for its listing has been published in the Federal Register, or "candidate" if a proposed regulation has not been published.

The *Migratory Bird Treaty Act* of 1918 and Executive Order 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*, require federal agencies to minimize or avoid impacts on migratory birds that are listed in 50 CFR 10.13. If a federal action cannot avoid measurable negative impact on migratory birds, the responsible agency must develop and implement, within two years, a Memorandum of Understanding with the FWS to promote the conservation of migratory bird populations. Migratory birds are those that live, reproduce, or migrate within or across international borders during their annual life cycle. The Act prohibits the taking (hunting, wounding, killing, possessing, or transporting) of any migratory bird, their eggs, features, or nests.

The *Bald and Golden Eagle Protection Act* and the *Migratory Bird Treaty Act* provide continued federal protection for the bald eagle, which was removed from the federal list of endangered and threatened

wildlife in 2007, although it may still be protected where it is listed under state laws. National guidelines for bald eagle management have been developed (FWS 2007).

Golden eagles received protection under the *Eagle Act* in 1962 due to the threat of their extinction, their similarity of appearance to bald eagles, and their value to agriculture as predators of rodents. Both species of eagles have special significance to Native American culture.

The *Federal Noxious Weed Act* mandates control of noxious weeds by limiting possible weed seed transport from infested areas to non-infested sites. Executive Order 13112, *Invasive Species*, requires federal agencies to prevent the introduction of invasive species; provide for their control; minimize their economic, ecological, and human health impacts; and, to the extent practicable, not authorize, fund, or carry out management actions that are likely to cause the introduction or spread of invasive species.

3.6.2 Current Conditions

3.6.2.1 Regional Overview

Hot Springs in Fall River County and Rapid City in Pennington County and their immediate surroundings comprise the potentially affected environment for biological resources. These surroundings include the Black Hills area and Black Hills National Forest, which directly flank Rapid City on its western border and closely envelop the town of Hot Springs to the north and west. Black Hills National Forest encompasses over 1.2 million acres that consist primarily of early to late succession ponderosa pine communities with inclusions of white spruce, quaking aspen, paper birch, bur oak, mountain mahogany, and high mountain meadows. Riparian habitats consist mainly of sedges, forbs, and willows. The lower elevations include grassland prairie. The forest includes 11 reservoirs, 1,300 miles of streams, and 13,000 acres of wilderness (National Forest Foundation 2015).

Approximately half of Fall River County is occupied by the Buffalo Gap National Grassland to the south and the Black Hills National Forest to the north. Higher elevation areas to the north into the Black Hills National Forest create favorable growing conditions for ponderosa pine. The lower elevation areas surrounding the Black Hills to the south are primarily used as rangeland for livestock grazing and as agricultural land. Just south of Hot Springs is a wild horse sanctuary on 11,000 acres of grassland prairies, ponderosa pine forests, and canyons along the Cheyenne River. Ten miles south of town is the Angostura Reservoir and Recreation Area that includes 36 miles of shoreline and sandy beaches. It is one of the few reservoirs in southwestern South Dakota and is an important location for migratory birds (SDFGP 2015a).

More than half of Pennington County is occupied by the Black Hills National Forest; as a result, the majority of the land cover in this county consists of ponderosa pine forest associated with short to tall grasslands and agricultural fields (NRC 2009). Within Rapid City, the land bordering Rapid Creek is prone to periodic flooding; thus, the city has conserved much of the land along its banks as open greenways that include habitat conservation and environmentally sensitive areas. City preservation areas include the floodplains along Rapid Creek and Box Elder Creek, riparian and upland wooded areas, and wildlife corridors. Agricultural uses are located primarily to the north, east, and south of Rapid City, outside of the urban services boundary, although some active agricultural lands currently existing within the urban services boundary today. Buffer reserves are found around major public facilities, such as the airport and water reclamation plant. Publicly and privately owned forest

conservation areas are located in the forested areas primarily to the west of Rapid City limits as well as central locations along Skyline Drive and north of M Hill.

3.6.2.2 Vegetation

3.6.2.2.1 Black Hills

The Black Hills are dominated by ponderosa pine with open parklands and valleys covered by grasses. Pine forest intergrades with ponderosa pine woodland at lower elevations, in the lower Minnekahta Foothills, Red Valley, and Hogback Rim. This analysis focuses on the lower elevations of the Black Hills, which is the portion that abuts Rapid City and Hot Springs. In these areas, pine woodland includes somewhat closed to open, savanna-like stands of ponderosa pine. Bur oak, often mixed with ponderosa pine, can form large stands, especially in the northern and eastern parts of the Black Hills. Riparian hardwood vegetation at the lower elevations may include stands of bur oak with ironwood. Other riparian woodland types include cottonwood stands on low elevation floodplains, and a mix of hardwoods species such as oak, ash, boxelder, elm, and hawthorn in lower elevation draws and drainages.

Riparian shrublands at lower elevations typically consist of a mix of shrubs such as western snowberry, gooseberry, currant, and rose. Silver sagebrush occasionally forms large stands on floodplains. Thickets of western snowberry are common in draws and on floodplains.

Non-riparian shrubland types are best developed at lower elevations. Stands of big sagebrush are found in the outer part of the Hogback Rim. Mixed-grass prairie grasslands are most extensive at lower elevations, in the Minnekahta Foothills, Red Valley, and Hogback Rim. Dominant species include representatives of short, mixed and tallgrass prairies (Hall et al. 2002)

The Ponderosa Pine Woodland ecological system is best developed at lower elevations in the Black Hills, below 5,500 feet in the southern part and 4,500 feet in the northern part. Stands are occasional at higher elevations. This matrix system typically occurs in large-scale mosaics with grassland and shrubland types, and with bur oak in the northern and eastern Black Hills. These communities include ponderosa pine/bluebunch wheatgrass woodland, ponderosa pine/chokecherry forest, ponderosa pine/little bluestem woodland, ponderosa pine/Rocky Mountain juniper woodland, ponderosa pine/sedge woodland, and ponderosa pine/western wheatgrass woodland. Not all communities may be present, and some appear to be limited in distribution. Component communities can occur at higher elevations but are less common and not as extensive.

The Prairie ecological system also occurs at the same lower elevations in the Black Hills. Smaller stands of component communities occur at elevations as high as 6,000 feet in the southern Black Hills. This large patch system typically occurs in large-scale mosaics with ponderosa pine woodland communities and with low-elevation shrubland types. The Prairie ecological system includes stands of grassland communities, including western wheatgrass–green needlegrass mixed grass prairie, needle-and-thread–blue grama mixed grass prairie, northern Great Plains little bluestem prairie, northern plains big bluestem prairie, western wheatgrass–blue Grama–threadleaf sedge prairie, and wheatgrass–needle-and-thread mixed grass prairie. Not all communities may be present.

The Low Elevation Floodplain ecological system occurs along larger streams and rivers below 5,000 feet in the Black Hills. Most habitat is in private ownership; as a result, this system is under-surveyed and not well-characterized. It consists of various combinations of low elevation hardwood and

shrubland types, including ash–elm/wolfberry forest, box elder/chokecherry forest, cottonwood–peach-leaf willow floodplain woodland, cottonwood/wolfberry floodplain woodland, sandbar willow shrubland, silver sagebrush/western wheatgrass shrub prairie, and western snowberry shrubland. Grassland stands may also be present (Hall et al. 2002; USGS 2013).

3.6.2.2.2 Hot Springs

Hot Springs is located within the Level IV Foothills ecoregion of the Level III Black Hills Ecoregion. The Black Hills Foothills ecoregion consists of two contrasting landscapes, the Hogback Ridge and the Red Valley. The Hogback Ridge forms a ring of foothills surrounding the Black Hills. The Red Valley (of Racetrack) encircles most of the Black Hills dome and acts as a buffer between the Hogback Ridge and the Black Hills. Natural vegetation within this region includes ponderosa pine, woodlands and open savannas with an understory of western wheatgrass, needle-and-thread grass, little bluestem, blue grama, buffalo grass, and leadplant. In addition, Rocky Mountain juniper occurs in the south. Battle Mountain, which rises from the northeast edge of Hot Springs, is located in the Dakota Hogback region of the Black Hills. Most of the mountain is covered with ponderosa pine forest although some aspen can be found (USGS 2013; SummitPost 2014).

The Hot Springs VAMC grounds include mature vegetation. The bluff opposite of the site is thickly wooded. The campus slopes northeast at the rear of the hospital complex; the slope is covered with trees and shrubs.

3.6.2.2.3 Rapid City

Rapid City is generally consistent with an urban setting but the Rapid City area lies in the plains, just east of the hogback in the Black Hills, and is flanked to the west by the Black Hills Foothills ecoregion. Rapid City is located within the Northwestern Great Plains Ecoregion (Level III) and the Semi-arid Pierre Shale Plains. The Semi-arid Pierre Shale Plains are relatively treeless, consisting of rolling hills and grasslands. Native grasslands persist in areas of steep or unbroken topography, but they have been largely replaced by spring wheat and alfalfa over most of the ecoregion. Agriculture is limited by erratic precipitation patterns and limited opportunities for irrigation. The mixed grass prairie outside of Rapid City has a predominance of shortgrass species such as little bluestem and buffalograss (Omernik et al. 2008).

3.6.2.3 Wildlife

Wildlife populations in the Black Hills are diverse, consisting of species found in both western and eastern states. Elk, mule deer, pronghorn, and white-tailed deer are commonly seen. Black bears have been spotted in the Black Hills. Mountain lions are increasing dramatically as a result of prolific herds of deer and elk. Coyote, bighorn sheep, and mountain goats are also frequently seen. Bald eagle, hawk, osprey, peregrine falcon, and another 200 species of birds can be found in the forest, especially along streams and near water sources.

Low elevation riparian ecosystems in the Black Hills National Forest are not well-documented (USFS 2005). Approximately one-half of all low elevation riparian systems on the forest are privately owned (USFS 2005). As with other riparian ecosystems found in the Black Hills, these low elevation riparian ecosystems are highly productive and have relatively high levels of biodiversity. Numerous emphasis species are associated with low-elevation riparian ecosystems.

Wildlife populations are more limited in the developed cities of Rapid City and Hot Springs; small mammal vertebrates (bats, mice, and rabbits) are common, although white-tailed deer may also be seen, including on the VA Hot Springs campus. Abundant bird species are found near Rapid Creek in Rapid City and Fall River in Hot Springs. The most common wildlife species near the town of Hot Springs are deer and pronghorn antelope, with other species present including elk, mountain lion, bighorn sheep, coyote, porcupine, fox, and rabbits. Like the entire Black Hills region, there is an abundance of bird species near Hot Springs.

Wildlife in the region of Rapid City includes many species of birds, reptiles, amphibians, and mammals that are characteristic of the Great Plains. Common wildlife species that occur around Rapid City are those typical of semi-developed grassland areas. Common mammals include mule deer, white-tailed deer, coyote, red fox, white-tailed jackrabbit, striped skunk, raccoon, black-tailed prairie dog, and big brown bat (SDGFP 2015b).

3.6.2.4 Fisheries

3.6.2.4.1 Black Hills

Streams in the southern Black Hills are generally intermittent or ephemeral; many disappear underground. Others empty into the Cheyenne River, one of the two main rivers that encircle the Black Hills National Forest. The Cheyenne River flows from Wyoming into the southern part of the forest, towards the southeast and then turns northeastward along the southern foothills. About 60 miles further downstream, the Cheyenne empties into Lake Oahe on the Missouri River.

Historically, fish species diversity was limited in the Black Hills. Native species include creek chub, fathead minnow, finescale dace, lake chub, longnosed dace, longnosed sucker, mountain sucker, and white sucker. Many non-native fish species have been introduced, including salmonids. Trout were first introduced from Colorado in the 1880s. Following introduction, fish were further distributed by fishing enthusiasts, and many streams became populated with trout from reproduction and movement within watersheds. The effects of these non-natives on the native fisheries are unclear, although it is known that trout compete for food and space and prey on small fishes. All native fish species still occur in the Black Hills at varying population levels.

3.6.2.4.2 Hot Springs

Hot Springs is located within the Fall River watershed. The major waterbodies that support fisheries in Hot Springs and surrounding environs include the Fall River, Hot Brook Creek, Cold Brook Creek, and the Angostura Reservoir located 10 miles to the south. Multiple species of warmwater fish are found in Hot Brook Creek and the Fall River including longnose dace, sand shiner, bluegill, green sunfish, white sucker, creek chub, plains topminnow, and domestic non-native goldfish and jack dempsey. Other species found in the Fall River include channel catfish, smallmouth bass, shorthead redhorse, rock bass, and common carp. The South Dakota Department of Game, Fish, and Parks and SDDENR independently conducted waterbody assessments dating back to 1998; neither agency documented coldwater species in either Hot Brook Creek or the Fall River, where water temperatures are warm, often exceeding 80° F. During the winter months, the water temperature remains high enough that the creek and river do not freeze. In 2010, both Hot Brook Creek and the Fall River were assessed by the SDDENR, who determined the beneficial use designation of "coldwater marginal fish life propagation waters" should be removed and replaced as follows:

- Fall River: From the confluence of Hot Brook and Cold Brook Creek all the way to the Cheyenne River, the beneficial use designation was changed to (4) Warmwater permanent fish life propagation waters; (8) Limited contact recreation waters; (9) Fish and wildlife propagation, recreation, and stock watering waters; and (10) Irrigation waters.
- Hot Brook Creek: From Section 19, Township 7 South, Range 5 East to the confluence of Cold Brook Creek, the beneficial use designation was changed to (1) Domestic water supply; (4) Warmwater permanent fish life propagation waters; (8) Limited contact recreation waters; (9) Fish and wildlife propagation, recreation, and stock watering waters; and (10) Irrigation waters.

Cold Brook Dam was constructed on Cold Brook Creek to reduce flood damages in the Fall River Basin. Cold Brook Reservoir, located less than one mile north of Hot Springs, is managed for flood control and recreation. It is approximately 32 acres in area and contains rainbow trout, largemouth bass, black crappie, and green sunfish (SDGFP 2007). The reservoir is currently managed as a trout fishery (rainbow trout) with monthly stocking when water temperatures permit adequate survival; bass are managed as natural yield.

Angostura Reservoir lies to the southeast of Hot The reservoir is classified as a warmwater permanent fishery. Primary species (game and forage) include walleye, channel catfish, smallmouth bass, gizzard shad, largemouth bass, black crappie, spottail shiner, and emerald shiner. Secondary and other species include bluegill, common carp, green sunfish, northern pike, northern redhorse, river carpsucker, white sucker, yellow perch, and freshwater drum (SDGFP 2013a).

3.6.2.4.3 Rapid City

Rapid City is located primarily within the Rapid Creek watershed, with the Box Elder Creek watershed running just to the north of Rapid City. Rapid Creek is the largest stream in the Black Hills of western South Dakota. It is an important stream for anglers and has two dams on it creating Pactola Reservoir and Canyon Lake. Canyon Lake is a small reservoir (25 acres) located in the southwestern part of Rapid City. It is a popular for fishing and contains rainbow trout (stocked throughout the year), brown trout, and white sucker (SDGFP n.d.).

Like most streams in the Black Hills, Rapid Creek experienced drastic changes in flow over the past 15 years. Most of western South Dakota experienced moderate to severe drought from 2002 to 2008 (SDGFP 2013b), followed by four years of above average precipitation, and then lower than average precipitation in 2012. Drastically varying flow events likely changed fish populations and habitat throughout Rapid Creek.

Another stressor for Rapid Creek fish populations is the diatom *Didymosphenia geminate* (didymo or rock snot), that was discovered there in 2002. By 2004 large mats of didymo were present in the creek and generated complaints about aesthetics and water quality.

The majority of Rapid Creek and its tributaries are managed as a wild trout (natural yield) fishery. One area of Rapid Creek within Rapid City is managed for catch and release, from Jackson Boulevard upstream through the Meadowbrook Golf Course to Park Drive (SDGFP 2013b). Popular fishing areas with good access on Rapid Creek are around Pactola Reservoir and within Rapid City. As part of a statewide fisheries survey in 2013, eight species of fish were sampled in Rapid Creek. Brown trout were the most abundant in every segment and rainbow trout were found

in all five segments. Other species were found in low densities and included creek chub, longnose dace, white sucker, rock bass, mountain sucker, and bluegill. Most of these non-trout species occur near the reservoirs located on Rapid Creek (SDGFP 2013b). The SDGFP developed the *Fisheries Management Plan for Black Hills Streams 2015-2019* to guide fisheries management activities over the next five years (SDGFP n.d.).

The Box Elder Creek watershed lies north of the Rapid Creek watershed. The creek flows east through the northwest end of Rapid City and drains into the Cheyenne River south of Wasta, SD. A state fisheries survey conducted on the creek in 2012 captured eight species of fish; the most abundant species was longnose dace. From a game fish perspective, the creek appears to change from a brown trout fishery to a brook trout fishery with upstream progression. Other species found were mountain sucker, creek chub, stonecat, and black bullhead (SDGFP 2012a).

3.6.2.5 Protected Species

Protected and sensitive biological resources include listed (threatened or endangered), proposed, and candidate species under the *Endangered Species Act*; state-listed threatened or endangered species; and migratory birds. Sensitive habitats include those areas designated by the FWS as critical habitat and sensitive ecological areas as designated by state or federal rulings. Sensitive habitats can also include wetlands, plant communities that are unusual or of limited distribution, and important seasonal use areas for wildlife (such as migration routes, breeding areas, and crucial summer and winter habitats).

Federally and state listed threatened and endangered species in Fall River and Pennington Counties are listed in Table 3.6-1.

The *South Dakota Wildlife Action Plan* (SDGFP 2012b) addresses the protection of all fish and wildlife species, with a priority on "species of greatest conservation need". The plan identifies essential habitats within the state, the habitats that have changed since the state was settled, which animal species need special attention to ensure their long-term survival, and ways to be more proactive in wildlife and habitat management. Table 3.6-2 lists the species of greatest conservation need whose habitat range includes all or part of Fall River or Pennington Counties, or are located within the portion of the Black Hills Ecoregion that lies at the fringe of Hot Springs and Rapid City areas, based on the current distribution map in the Plan.

Table 3.6-1. Threatened and Endangered Species in Fall River and Pennington Counties

Scientific Name	Common Name	Status	
		Federal	State
Fall River County			
Anthus spragueii	Sprague's pipit	Candidate	—
Calidris canutus rufa	Red knot	Threatened	—
Centrocercus urophasianus	Greater sage grouse	Candidate	—
Chrosomos neogaeus	Finescale dace	—	Endangered
Haliaeetus leucocephalus	Bald eagle	Delisted	Threatened
Myotis septentrionalis	Northern long-eared bat	Threatened	—
Pandion haliaetus	Osprey	—	Threatened
Vulpe velox	Swift fox	—	Threatened
Pennington County			
Anthus spragueii	Sprague's pipit	Candidate	—
Calidris canutus rufa	Red knot	Threatened	—
Catostomus catostomus	Longnose sucker	—	Threatened
Cinclus mexicanus	American dipper	—	Threatened
Falco peregrinus	Peregrine falcon	—	Endangered
Grus americana	Whooping crane	Endangered	Endangered
Haliaeetus leucocephalus	Bald eagle	Delisted	Threatened
Lontra canadensis	Northern river otter	—	Threatened
Macrhybopsis gelida	Sturgeon chub	—	Threatened
Mustela nigripes	Black-footed ferret	Endangered	Endangered
Myotis septentrionalis	Northern long-eared bat	Threatened	—
Pandion haliaetus	Osprey	—	Threatened
Rhodiola integrifolia ssp. *leedy*	Leedy's roseroot	Threatened	—
Sterna antillarum	Least tern (interior population)	Endangered	Endangered
Vulpe velox	Swift fox	—	Threatened

Source: FWS 2015; SDGFP 2015b.

Table 3.6-2. Species of Greatest Conservation Need in Fall River and Pennington Counties.

Birds	
Bald eagle (year round resident inside Black Hills ecoregion; summer resident outside region)	
Burrowing owl (summer)	
Ferruginous hawk (summer resident outside Black Hills region; migration inside region)	
Lark bunting – summer	
Northern goshawk (year round resident inside Black Hills region; winter resident outside region)	
Osprey (summer resident inside Black Hills region; migration outside region)	
Peregrine falcon – migration	
Mammals	***Insects***
Fringe tailed myotis (year-round)	Great Plains tiger beetle (year-round) [a]
Fringe tailed myotis (year-round)	Indian Creek tiger beetle (year-round) [b]
Silver haired bat (summer)	Iowa skipper (year-round) [a]
Townsend's big eared bat [a]	Little white tiger beetle (year-round) [b]
Fish	Ottoe skipper
Finescale dace (tributaries to Cheyenne) [a]	Regal fritillary (butterfly) (year-round)
Mountain sucker	***Flying Insects***
	Dakota stonefly (Cheyenne tributaries) [a]
	Dot-winged baskettail (Cheyenne tributaries) [a]

[a] Designated in Hot Springs area / Fall River County only.
[b] Designated in Rapid City area / Pennington County only.
Source: SDGFP 2012b.

Certain species that are protected under the *Migratory Bird Treaty Act* are present within the region at various times throughout the year given the state's proximity to the Central Flyway, a north-south migratory bird route. There are 24 migratory birds of concern in Fall River and Pennington Counties (FWS 2015):

American bittern
bald eagle
bell's vireo
black-billed cuckoo
Brewer's sparrow
burrowing owl
dickcissel
ferruginous hawk
golden eagle
grasshopper sparrow
greater sage-grouse
Hudsonian godwit
Lewis' woodpecker
loggerhead shrike
long-billed curlew
marbled godwit
mountain plover (Fall River County only)
pinyon jay
prairie falcon
red headed woodpecker
sage thrasher
short-eared owl
Swainson's hawk
upland sandpiper

3.7 Noise

Noise is defined as any sound that is undesired by the recipient and typically includes sounds not present in the natural environment, such as sounds emanating from aircraft; highways; and industrial, commercial, and residential sources. Noise generally interferes with normal activities or otherwise diminishes the quality of the natural environment. Noise may be intermittent or continuous, steady or impulsive, stationary or transient.

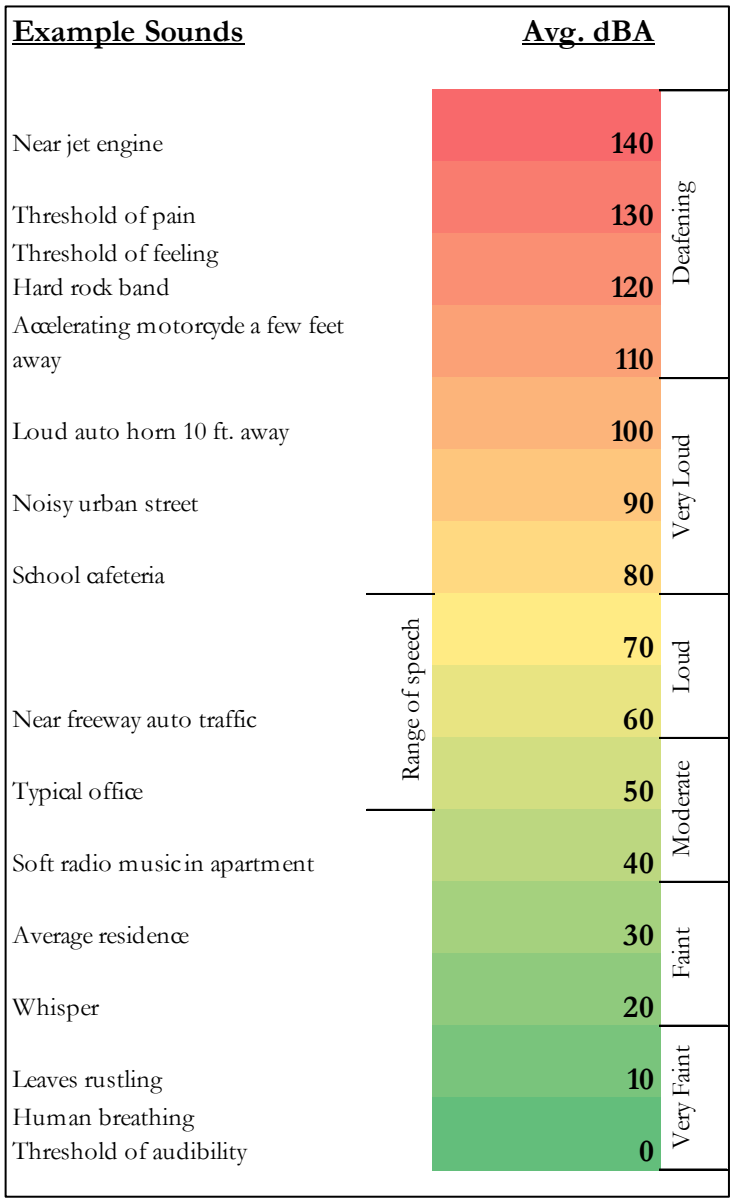
The standard measurement unit of sound is the decibel (dB), which represents the relationship between a measured sound pressure level and the minimum sound level a person with good hearing can detect reported on a logarithmic scale. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by three dB, and a halving of the energy would result in a three dB decrease, both of which are barely perceptible to the human ear.

The human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, sound can be characterized by several methods. The most common method is the "A-weighted" sound level (dBA), which gives greater weight to the frequencies audible to the human ear by filtering out noise frequencies not audible to the human ear. Human judgments of the relative loudness or annoyance of a sound correlate well with the dBA levels of those sounds. Therefore, the dBA scale is used for measurements and standards involving the human perception of noise. Figure 3.7-1 provides common sounds and the corresponding sound levels to demonstrate human perception of the correlation of noise with acoustical energy.

Noise levels vary continuously with time, and various descriptions of noise are used to account for this variance with time, including L_{eq} (which is the equivalent continuous sound level), L_{min} and L_{max} (which are the minimum and maximum noise levels recorded during a monitoring period), and L_{dn} (which is the day-night average sound level).

The construction and operation of new facilities generates noise. Construction-related noise is associated with the operation of construction equipment and vehicles, both in transit to/from and at the project site. Equipment noise levels also vary as a function of the usage factor or percentage of time the equipment is employed. Table 3.7-1 provides a list of noise levels associated with typical construction equipment.

The Roadway Construction Noise Model is a national noise screening model developed by the Federal Highway Administration to predict construction noise levels and determine compliance with regulatory noise limits.



Source: HUD 2009.

Figure 3.7-1. Common Sounds and Corresponding Sound Levels

Table 3.7-1. Noise Levels Associated with Typical Construction Equipment.

Equipment	Typical Noise Level 50 feet from source (dBA)	Typical Usage Factor (%)
Backhoe	80	40
Clam shovel (dropping)	93	20
Compactor (ground)	80	20
Compressor (air)	80	40
Concrete mixer truck	85	40
Concrete pump truck	82	20
Concrete saw	90	20
Crane	85	16
Dozer	85	40
Dump truck	84	40
Excavator	85	40
Flat bed truck	84	40
Front end loader	80	40
Generator	82	50
Grader	85	40
Jackhammer	85	20
Man lift	85	20
Pickup truck	55	40
Pneumatic tools	85	50
Pumps	77	50
Scraper	85	40
Tractor	84	40
Warning horn	85	5

Source: FHWA 2006.

Note: Typical construction equipment selected from Roadway Construction Noise Model default equipment list.

Ground-borne vibration is commonly associated with noise since vibration sources include many of the same sources (for example, construction equipment and vehicles) and may also interfere with normal activities or otherwise diminish the quality of the natural environment. Ground-borne vibration is not a common environmental problem, as it is unusual for vibration from sources such as road vehicles to be perceptible, even in locations close to major roads. Perceptible vibration sources for projects similar to that analyzed in this EIS include construction-related equipment (for example, heavy earth-moving equipment and pile-driving equipment).

Ground-borne vibration is typically reported as the root mean square of the vibration velocity level in vibration decibels. The approximate threshold for human perception of vibration is 65 vibration decibels.

3.7.1 Regulatory Framework

3.7.1.1 Noise Control Act

The U.S. EPA Office of Noise Abatement and Control was originally established to coordinate federal noise control activities. Upon its enactment, the office also implemented the *Federal Noise Control Act* of 1972, which established programs and guidelines to identify and address the effects of noise on public health and welfare and the environment. Table 3.7-2 summarizes recommended guidelines for noise levels considered safe for community exposure without the risk of adverse health or welfare effect (EPA 1974). To prevent hearing loss over the lifetime of a receptor, the yearly average L_{eq} should not exceed 70 dBA, and the L_{dn} should not exceed 55 dBA in outdoor activity areas or 45 dBA indoors to prevent interference and annoyance.

Table 3.7-2. Summary of EPA-Recommended Noise Level Standards

Effect	Level	Area
Hearing loss	$L_{eq(24)} \leq 70$ dB	All areas
Outdoor activity interference and annoyance	$L_{dn} \leq 55$ dB	Outdoors in residential areas and farms and other outdoor areas where people spend widely varying amounts of time and other places in which quiet is a basis for use
	$L_{eq(24)} \leq 55$ dB	Outdoor areas where people spend limited amounts of time, such as school yards and playgrounds
Indoor activity interference and annoyance	$L_{dn} \leq 45$ dB	Indoor residential areas
	$L_{eq(24)} \leq 45$ dB	Other indoor areas with human activities such as schools

Source: EPA 1974.

In 1981, EPA administrators determined that subjective issues such as noise would be better addressed at lower levels of government. Consequently, in 1982, responsibilities for regulating noise control policies were transferred to state and local governments. However, noise control guidelines and regulations contained in the rulings by EPA in prior years are still upheld by designated federal agencies, allowing more individualized control for specific issues by designated federal, state, and local government agencies. The *Noise Control Act* is applicable to the project insofar as it establishes general guidelines for acceptable noise levels perceived by adjacent or onsite receptors.

3.7.1.2 Federal Transit Authority Ground-Borne Vibration Guidelines

The Federal Transit Authority has established guidelines for maximum-acceptable vibration criteria for different land uses. Maximum acceptable vibration criteria based on the frequency of an event are applied to the different land uses to address the human response to ground-borne vibration (FTA 2006).

The Federal Transit Authority also established criteria addressing the potential for construction-caused vibration annoyance or interference. The primary concern related to construction vibration is the potential to cause structural damage to buildings by the operation of heavy-duty construction equipment. Situation-specific criteria address the level of vibration considered acceptable before it may result in damage to structures or different building types (FTA 2006).

3.7.1.3 Department of Veterans Affairs Master Construction Specifications, Temporary Environmental Controls

Section 01 57 19 of VA's master construction specification includes specific mitigating actions that would be required of any development on VA property to reduce construction-related noise (VA 2011). In particular, construction activities would mainly be limited to the hours of 8:00 a.m. to 6:00 p.m. and would abide by local noise ordinances. In addition, all equipment is required to be properly maintained and muffled such that noise levels of specific equipment would not exceed those shown in Table 3.7-3. VA also requires monitoring of noise levels at least once every five days during high noise generating construction activities.

Table 3.7-3. Maximum Permissible Construction Equipment Noise Levels.

Earthmoving Equipment	Maximum Permissible Noise Level (L_{max}) (dBA)	Materials Handling Equipment	Maximum Permissible Noise Level (L_{max}) (dBA)
Front loader	75	Concrete mixer	75
Backhoe	75	Concrete pump	75
Dozer	75	Crane	75
Tractor	75	Derrick, impact	75
Scraper	80	Pile driver	95
Grader	75	Jack hammer	75
Truck	75	Rock drill	80
Paver	80	Pneumatic tools	80
Pump	75	Saw	75
Generator	75	Vibrator	75
Compressor	75		

Source: VA 2011.

Note: Maximum permissible construction equipment noise level measured at 50 feet from source.

3.7.1.4 Local Noise Control Ordinances

According to Rapid City Ordinance 10.20.020(A), "Every motor vehicle shall, at all times, be equipped with a muffler in good working order and in constant operation to prevent excessive raucous or unusually loud noise, smoke or flame, and no person shall operate a motor vehicle upon the streets and highways of the city which is not so equipped, or which is equipped with a muffler cutout, bypass, Hollywood pipes or any similar device."

3.7.2 Current Conditions

For each project area, noise-sensitive land uses were identified. Noise-sensitive land uses include:

- Nearby residential areas
- Schools
- Hospitals
- Hotels/motel;
- Churches/cemeteries
- Libraries
- Public parks

Baseline sound levels were measured at representative locations in the vicinity of each currently operating facility. Sound levels were measured using an Extech Instruments Model 407736 digital sound level meter, which meets American National Standards Institute S1.4-1983 and International Electrotechnical Commission 60651 Type II standards. The meter's internal calibration feature was checked prior to obtaining measurements at each location, and the meter was operated on the A-weighting scale with slow response using a porous windscreen. Sound level measurements were taken at intervals over a recorded monitoring period at each location. Notes regarding monitoring conditions were recorded, and the L_{eq}, L_{min} L_{max}, and 10-, 50-, and 90-percentile (L_{10}, L_{50}, and L_{90}) values were determined.

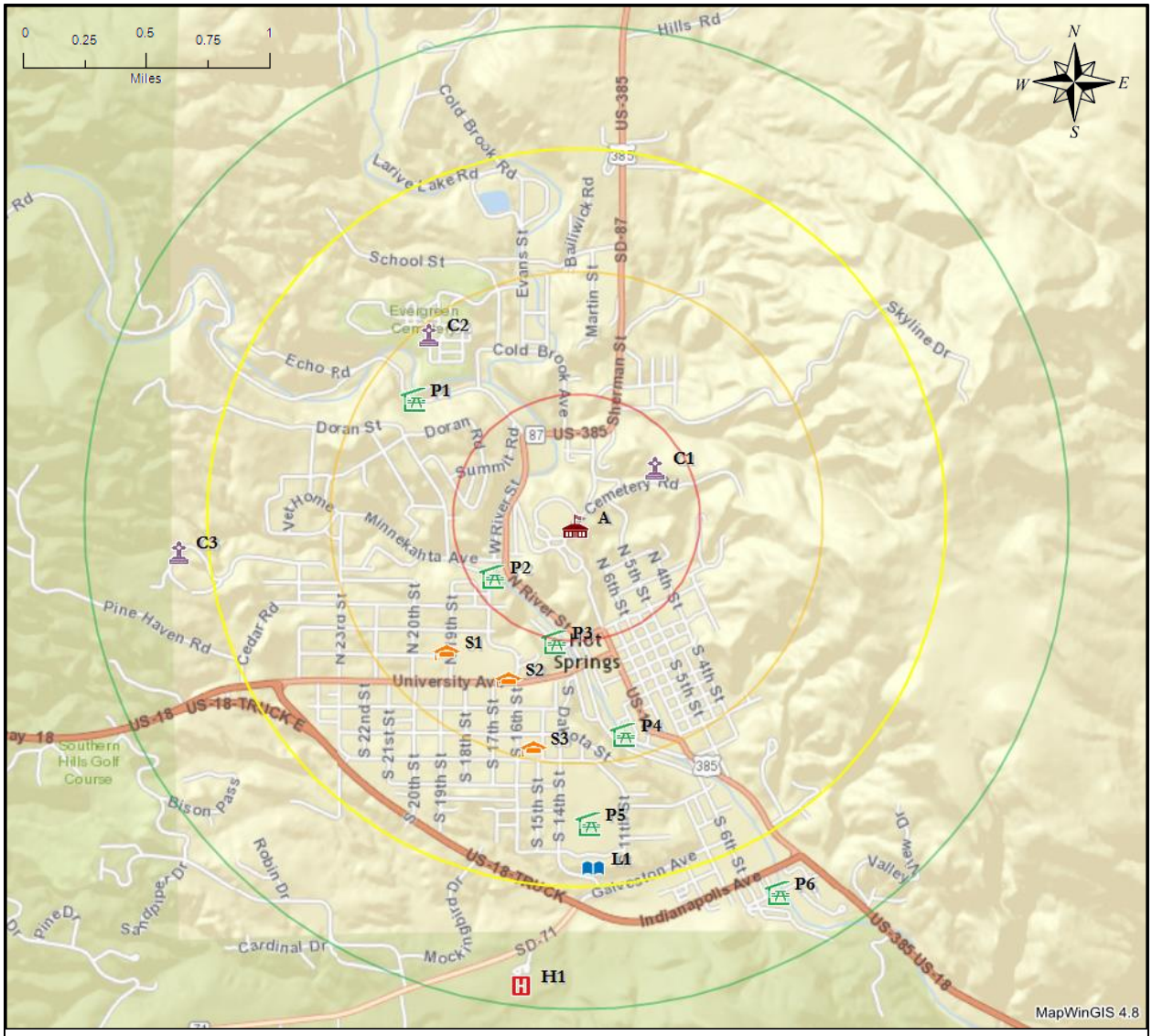
3.7.2.1 Hot Springs Area

The Hot Springs area is generally consistent with an urban or suburban setting. As such, the predominant noise sources in the area include mobile sources (such as personal and commercial vehicles) and stationary sources (such as heating, ventilation, and air conditioning units attached to buildings). Vehicle traffic and associated noise is heaviest along U.S. Highway 18 (University Avenue), U.S. Highway 18 Bypass (Indianapolis Avenue), and U.S. Highway 385 (N. River Street / Fall River Road).

Noise-sensitive land uses in the Hot Springs area were identified and mapped (see Figure 3.7-2). Table 3.7-4 lists the noise-sensitive receptors and their proximity to the existing Hot Springs VAMC. Hotels/motels, places of worship, and residential areas are also considered noise-sensitive land uses; these land uses were not depicted in Figure 3.7-2 due to their great numbers in the project area.

Table 3.7-4. Noise-Sensitive Receptors in Hot Springs Area.

Receptors within 0.5 miles of Hot Springs VAMC: • National Cemetery • Kidney Spring Park	Receptors within 1 mile of Hot Springs VAMC: • Evergreen Cemetery • Chautauqua Park • Centennial Park • Brookside Park • Hot Springs Elementary School • Hot Springs Middle/High School • Bethesda Lutheran School
Receptors within 1.5 miles of Hot Springs VAMC: • Butler Park • Hot Springs Library	Receptors within 2 miles of Hot Springs VAMC: • State Home Cemetery • Fall River Hospital • Umiker Park



Legend

A – VAMC – Hot Springs
C1 – National Cemetery
C2 – Evergreen Cemetery
C3 – State Home Cemetery
H1 – Fall River Hospital
L1 – Hot Springs Library
P1 – Chautauqua Park
P2 – Kidney Spring Park
P3 – Centennial Park
P4 – Brookside Park
P5 – Butler Park
P6 – Umiker Park
S1 – Hot Springs Elementary School
S2 – Hot Springs Middle/High School
S3 – Bethesda Lutheran School

½-mile radius
1-mile radius
1 ½-mile radius
2-mile radius

Projection: WGS84 Web Mercator (Auxiliary Sphere)
Source: Data Compiled by Labat Environmental, Inc., 2014.
Basemap Source: ArcGIS Online World Street Map, 2014.

Figure 3.7-2. Hot Springs Area Noise-Sensitive Receptors.

Sound level measurements were collected at four locations in the Hot Springs area to determine representative existing sound levels. These monitoring locations are shown in Figure 3.7-3. Sound levels were measured using an Extech Instruments Model 407736 digital sound level meter. Notes regarding monitoring conditions were recorded, and the L_{eq}, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} values were determined (see Table 3.7-5). The measured daytime sound levels are characteristic of a typical urban area.

Noise-sensitive buildings are also commonly considered as vibration-sensitive receptors. Historic or lightweight buildings are considered most vulnerable to vibration disturbance or damage. Vibration due to passing vehicles was not noticeable during the collection of sound level measurements.

Table 3.7-5. Existing Sound Level Measurements in the Hot Springs Area.

Site	Location	Time	Sound Level (dBA)					
			L_{eq}	L_{max}	L_{10}	L_{50}	L_{90}	L_{min}
1	Butler Park	7:50 a.m.	48.1	52.2	50.4	47.4	46.7	46.5
2	Hot Springs VAMC	8:06 a.m.	47.9	50.3	48.9	47.6	46.8	46.5
		9:50 a.m.	48.0	50.7	49.5	47.6	46.8	46.5
3	Near Chautauqua Park	8:23 a.m.	51.9	66.4	48.0	47.5	47.0	46.9
4	Centennial Park	9:33 a.m.	51.8	61.9	52.4	48.7	47.5	47.0

Source: Data collected by Labat Environmental, Inc., November 17, 2014.

Key: L_{eq} = equivalent sound level, L_{MIN} = minimum sound level, L_{max} = maximum sound level, L_n = sound level exceeded n% of the specific time period.

Observation Notes:

Site 1: Quiet calm morning, occasional vehicles passing approximately 100 feet away.

Site 2: Quiet calm morning, occasional vehicles passing approximately 150 feet away.

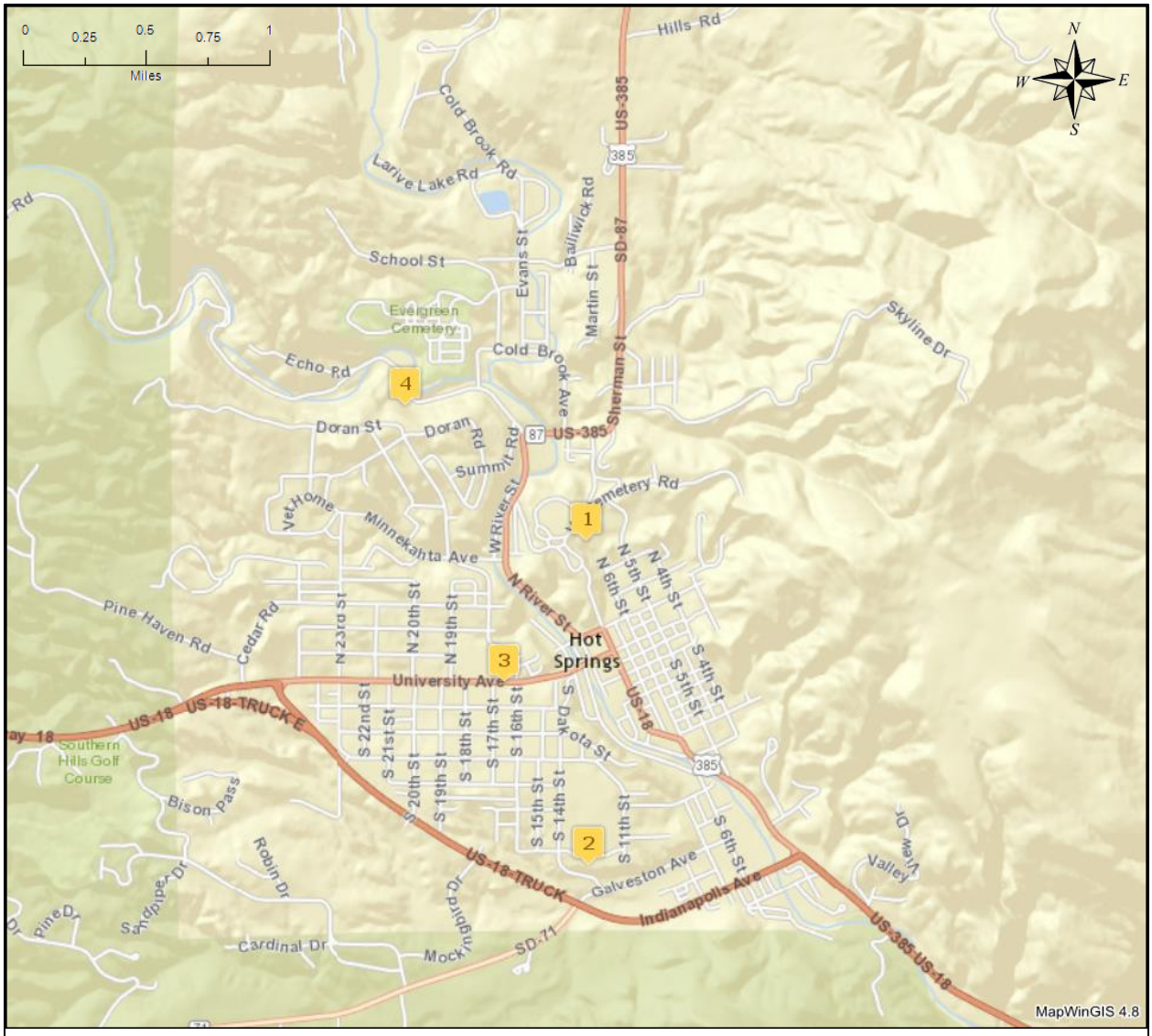
Site 3: Quiet calm morning, occasional vehicles passing adjacent to location.

Site 4: Quiet breezy morning, occasional vehicles passing adjacent to location.

3.7.2.2 Rapid City Area

The Rapid City area is generally consistent with an urban setting. As such, the predominant noise sources in the area include mobile sources (such as personal and commercial vehicles) and stationary sources (such as heating, ventilation, and air conditioning units attached to buildings). Vehicle traffic (and associated noise) is heaviest along Interstate 90, U.S Highway 16 (Mount Rushmore Road), SD-79 (St. Joseph Street / Main Street), and SD-44 (Omaha Street).

Noise-sensitive land uses in the Rapid City area were identified and mapped. Figure 3.7-4 shows noise-sensitive land uses in the vicinity of the existing Rapid City CBOC, and Figure 3.7-5 shows noise-sensitive land uses in the Rapid City metropolitan area. Table 3.7-6 lists noise-sensitive receptors and their proximity to the existing Rapid City CBOC. Hotels/motels, places of worship, and residential areas are also considered noise-sensitive land uses; these land uses were not depicted in Figures 3.7-4 and 3.7-5 due to their great numbers.

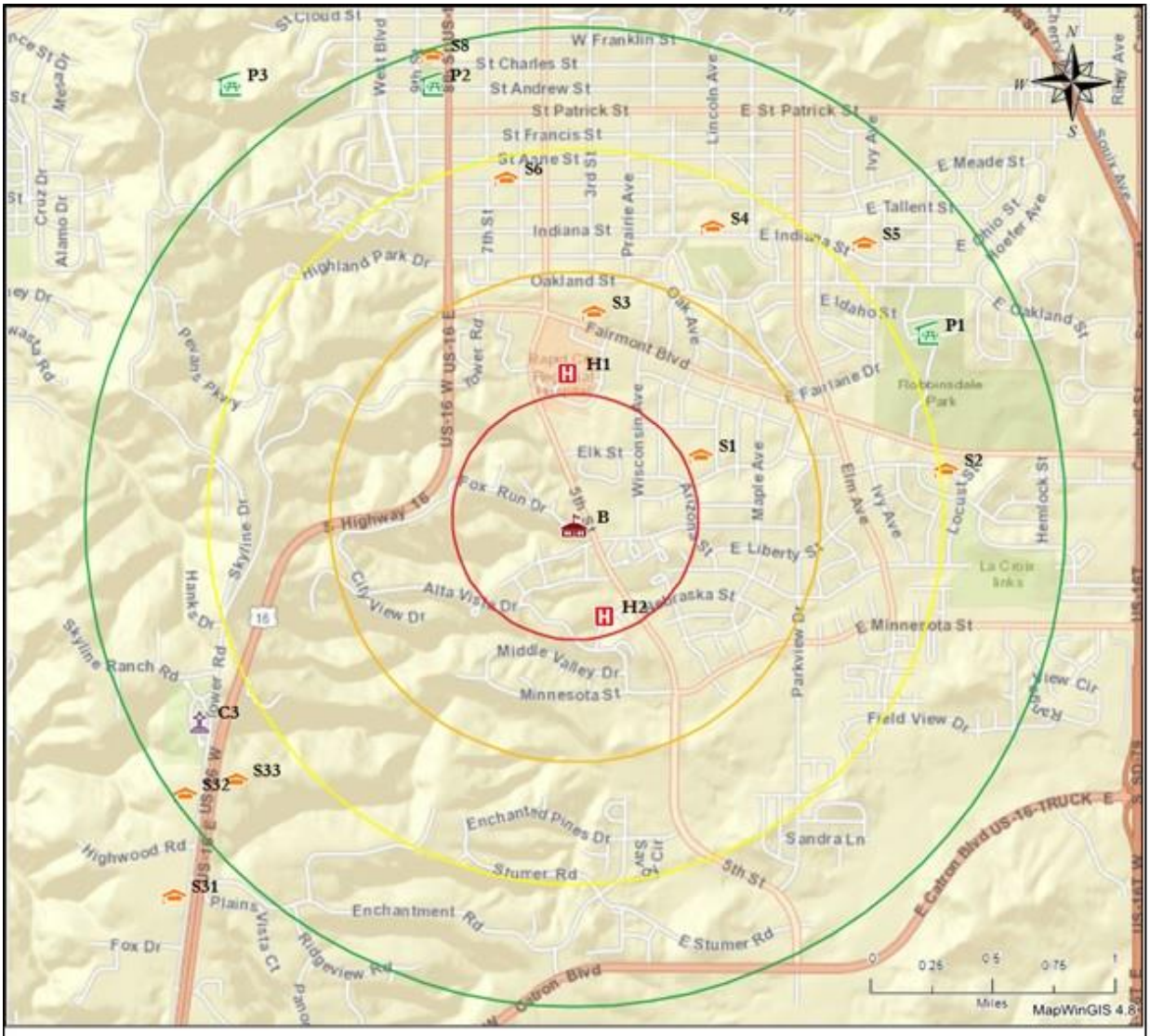


Legend

Sound Level Monitoring Location

Projection: WGS84 Web Mercator (Auxiliary Sphere)
Source: Data Compiled by Labat Environmental, Inc., 2014.
Basemap Source: ArcGIS Online World Street Map, 2014.

Figure 3.7-3. Hot Springs Area Sound Level Monitoring Locations.



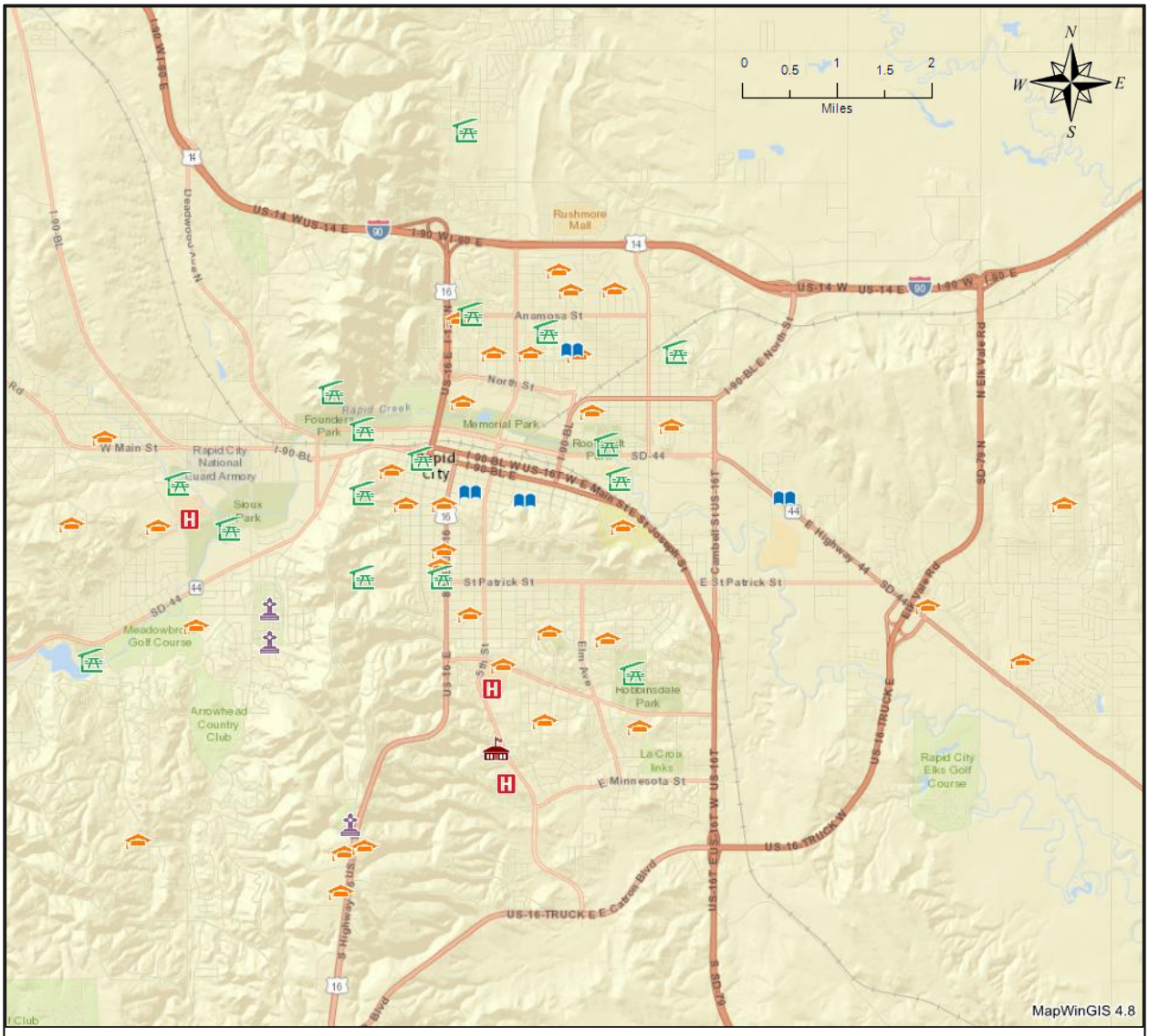
Legend

B – CBOC – Rapid City
C3 – Pine Lawn Memorial Park
H1 – Rapid City Regional Hospital
H2 – Black Hills Surgical Hospital
P1 – Robbinsdale Park
P2 – Wilson Park
P3 – Skyline Wilderness Park
S1 – Grandview Elementary School
S2 – St. Paul's Lutheran School
S3 – Saint Thomas More High School
S4 – South Middle School
S5 – Robbinsdale Elementary School
S6 – USD School of Medicine
S8 – Wilson Elementary School
S31 – Memorial Christian School
S32 – Calvary Christian School
S33 – Zion Lutheran School

½-mile radius
1-mile radius
1 ½-mile radius
2-mile radius

Projection: WGS84 Web Mercator (Auxiliary Sphere)
Source Data Compiled by Lab at Environmental, Inc., 2014.
Basemap Source: ArcGIS Online World Street Map, 2014.

Figure 3.7-4. Rapid City Area Noise-Sensitive Receptors (CBOC Vicinity).



Legend

- CBOC – Rapid City
- Cemetery
- Hospital
- Library
- Park
- School

Projection: WGS84 Web Mercator (Auxiliary Sphere)
Source: Data Compiled by Labat Environmental, Inc., 2014.
Basemap Source: ArcGIS Online World Street Map, 2014.

Figure 3.7-5. Rapid City Area Noise-Sensitive Receptors.

Table 3.7-6. Noise-Sensitive Receptors in Vicinity of Rapid City CBOC.

Receptors within 0.5 miles of Rapid City CBOC: • Black Hills Surgical Hospital	Receptors within 1 mile of Rapid City CBOC: • Rapid City Regional Hospital • Grandview Elementary School • Saint Thomas More High School
Receptors within 1.5-miles of Rapid City CBOC: • South Middle School • University of South Dakota School of Medicine	Receptors within 2 miles of Rapid City CBOC: • Pine Lawn Memorial Park • Robbinsdale Park • Wilson Park • St. Paul's Lutheran School • Robbinsdale Elementary School • Wilson Elementary School • Calvary Christian School • Zion Lutheran School

Sound level measurements were collected at four locations in the Rapid City area to determine the representative existing sound levels. These monitoring locations are shown in Figure 3.7-6. Sound levels were measured using an Extech Instruments Model 407736 digital sound level meter. Notes regarding monitoring conditions were recorded, and the L_{eq}, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} values were determined (see Table 3.7-7). The measured daytime sound levels are characteristic of a typical urban area.

Noise-sensitive buildings are also commonly considered as vibration-sensitive receptors. Historic or lightweight buildings are considered most vulnerable to vibration disturbance or damage. Vibration due to passing vehicles was not noticeable during the collection of sound level measurements.

Table 3.7-7. Existing Sound Level Measurements in the Rapid City Area

Site	Location	Time	Sound Level [dBA]					
			L_{eq}	L_{max}	L_{10}	L_{50}	L_{90}	L_{MIN}
1	Rapid City CBOC	10:52 AM	54.3	64.4	55.5	52.9	51.1	50.3
2	Rapid City Reg. Hospital	11:07 AM	53.5	57.7	55.4	52.8	50.4	49.9
3	Robbinsdale Park	11:23 AM	57.6	65.2	60.3	56.6	52.5	51.1
4	Rushmore Mall	11:46 AM	55.6	66.3	57.1	53.2	51.4	50.7

Source: Data collected by Labat Environmental, Inc., November 17, 2014.

Key: L_{eq} = equivalent sound level, L_{MIN} = minimum sound level, L_{max} = maximum sound level, L_n = sound level exceeded n% of the specific time period.

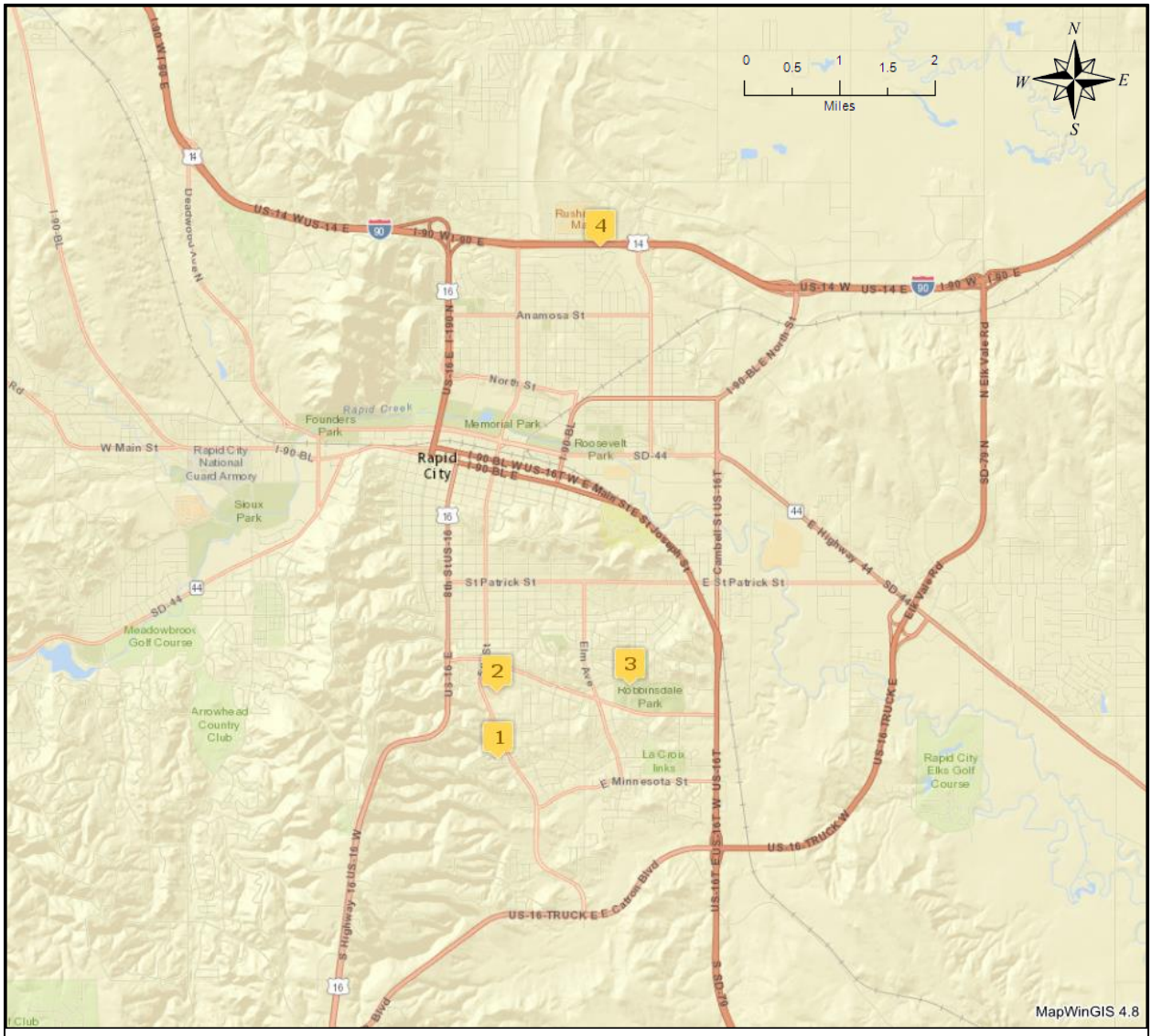
Observation Notes:

Site 1: Breezy day, cars passing by approximately 100 feet away on active roadway.

Site 2: Breezy day, gusty winds, cars passing by approximately 200 feet away on active roadway.

Site 3: Gusty winds, cars passing by adjacent to location, people talking and yelling.

Site 4: Gusty winds, I-90 approximately 500 feet away, cars passing adjacent to location.



Legend

Sound Level Monitoring Location

Projection: WGS84 Web Mercator (Auxiliary Sphere)
Source: Data Compiled by Labat Environmental, Inc., 2014.
Basemap Source: ArcGIS Online World Street Map, 2014.

Figure 3.7-6. Rapid City Area Sound Level Monitoring Locations.

3.8 Land Use

Land use is defined by the physical and functional arrangement of and interrelationships between structures, transportation systems, utilities, uses, and open lands. Human decisions and actions create, influence, and are subject to these physical and functional systems.

To the extent enabled by law, most communities attempt to manage land use in ways that will promote orderly development and limit the negative impacts of unplanned, unregulated random development. While the benchmark of what constitutes orderly development varies widely, the tools used to accomplish orderly development are common and include comprehensive plans and zoning regulations. Prudent planning, combined with land use regulations designed to accomplish plan objectives, can increase the likelihood of orderly growth.

3.8.1 Regulatory and Policy Framework

Several VA documents address various aspects of siting and designing different types of VA health care facilities including land use compatibility and constraints. Consideration is given to local land use planning and zoning ordinances even if VA is not legally required to comply with them.

3.8.1.1 VA Directive and Guidelines

3.8.1.1.1 VA Directive 0066, Sustainable Locations

In fiscal year (FY) 2012, VA issued Directive 0066 regarding sustainable locations for VA facilities. This directive states that VA will:

- advance local and regional planning goals
- seek location-efficient sites that
  - prioritize central business districts and rural town centers,
  - prioritize locations that promote transportation choice,
  - promote walkable and bikeable sites,
  - locate in areas that are accessible to a diverse range of employees and visitors
- maximize use of existing resources by
  - prioritizing areas that are currently well-served by water, sewer and other relevant public infrastructure
  - prioritizing brownfield/grayfield and infill development, including historic districts
  - emphasizing the preservation and re-use of historic and other existing buildings
- foster protection of the natural environment by
  - preserving existing ecosystems
  - avoiding development of green space
  - promoting climate change adaptation planning

In choosing sites for new medical facilities, VA deploys a strategy to minimize greenfield construction (that is, construction in a previously undeveloped location). VA's Sustainable Design Manual (VA 2014a) promotes the practice of sustainable siting.

3.8.1.1.2 VA Mental Health Facilities Design Guide

The VA *Mental Health Facilities Design Guide* (VA 2014b) makes specific reference to local zoning: "Unlike many general aspects of site design such as roadways and parking aisles, zoning is site specific. Preliminary plans should not advance without performing a zoning analysis. In the case of government-owned property, it is important to consider the zoning and adjacencies for compatibility with neighboring buildings." The design guide factors for zoning include:

- Height
- Lot occupancy
- Number of stories
- Parking
- Green space
- Historic district
- Floor area ratio (ratio of the total area of all floors of a building to the area of the parcel
- Setbacks
- Use groups

According to VA, an RRTP should be developed as part of a larger campus with compatible uses or adjacent to such uses, so that efficiencies and operations are enhanced. Landscaping is also emphasized in VA's design guides.

3.8.1.1.3 VA Outpatient Clinic Design Guide and Standards for Leased CBOC Facilities

The VA *Outpatient Clinic Design Guide* (VA 2009a) includes criteria for site selection. The clinic site should be in a neighborhood with prime commercial or medical office space, or with research, clinical, or technology space that is suitable for medical uses. The neighborhood should present a professional image and offer a feeling of security for patients and personnel. Other selection factors include:

- Topography without steep grades and not within the 100-year or 500-year floodplains.
- No environmental hazards or restrictions.
- Prominent visibility from major public thoroughfares.
- Ingress/egress easily accessible from major public thoroughfares.
- Convenient to regularly scheduled public transportation.

VA's standards for leased CBOC facilities (VA 2009b) include the same site selection criteria listed above, in addition to being within two miles of laboratory and x-ray facilities, evidence of compliance with local zoning laws or variance approvals, and evidence of compliance with any specific zoning conditions that may be required in order to develop the property.

3.8.1.1.4 VA Site Development Design Manual

VA has published a comprehensive Site Development Design Manual (VA 2013) concerning a wide range of issues, and incorporates contemporary practices such as low-impact development and green building principles (LEED – Leadership in Energy & Environmental Design). This guidance addresses sustainability, stormwater management, energy and water conservation, linkages to

adjacent and proximal uses, solar orientation, pedestrian and bike paths, various benefits of and approaches to site landscaping, and other topics.

3.8.1.2 Local Land Use Planning

Land use in the State of South Dakota is primarily regulated through county and municipal planning and zoning ordinances, as well as subdivision platting requirements. South Dakota state laws specifically grant this local authority (11 South Dakota Codified Laws [SDCL] 2, 4, 6; 9 SDCL 9-12(3)).

3.8.1.2.1 Fall River County

Fall River County does not at present have a comprehensive plan or a transportation plan, but has a land use policy adopted by the County Commission (Fall River County 2011). Policy #2011-01, "Land Use Policy for Fall River County" states that:

- The Commission opposes the following actions:
  - Reduction in grazing allotments or changes that would hamper agricultural industry
  - Reduction in public access to public lands
  - Road closures or travel restrictions on public lands
  - The introduction or re-introduction of any species not currently present except biological control of noxious weeds and invasive plant species
  - The introduction or re-introduction of any predator animals
  - Further additions to public land unless an equal value of land is returned to private ownership
  - Restriction on public access to archaeological resources
- The Commission supports or favors the following actions:
  - Control of any existing predators
  - Immediate attention to disease outbreak or infestation in the forests or grasslands
  - Good forestry management, well managed timber sales, and safe mineral extraction
  - Agricultural and recreational activity on public land to include, but not be limited to, livestock grazing, hunting, hiking, ATV riding, rock hounding, horse-back riding, sight-seeing, photography, or camping

3.8.1.2.2 Pennington County

The Pennington County Comprehensive Plan was adopted in August of 2003 by the Board of County Commissioners (Pennington County 2003).

Rapid City is the largest community in the county, with roughly 71,000 of the county's 106,000 residents in 2013. At the time the plan was developed, it was anticipated that over 75 percent of future population growth in the county would occur within Rapid City. It was also anticipated that Rapid City's position as a "regional healthcare, educational and retail center" would lead to additional service sector employment and that the area would continue to attract retirees. The future

land use map focuses urban growth toward areas that have sufficient infrastructure and public services, such as water, sanitary sewer, access, and public safety. The plan is not specific in regard to health care and related services.

3.8.1.2.3 Hot Springs Comprehensive Plan

The current comprehensive plan was written in the early 1980s based on the data cited within it (Hot Springs n.d.). The plan was partly based on the assumption that the VA Hot Springs facility would continue to grow. The population projections of 6,000 to 7,000 persons by the year 2000 have not occurred compared to the current population of 3,800. Thus, instead of specifics, this overview summarizes the basic goals and policies within the plan.

The stated land use goal is "To establish a land use pattern which will enhance and preserve the environment while allowing new growth and development to occur, and to preserve those fragile natural areas and features which contribute to the present community character and atmosphere." The stated land use objectives are:

- Protect prime irrigated agricultural lands from development and direct future urban growth toward dry land areas.
- Prohibit development in natural hazard areas (floodplains, steeply sloping areas, and unstable geologic areas).
- Promote clustering activities to discourage costly urban sprawl and inefficient land use.
- Preserve unique and sensitive natural areas (lakes, unique scenic vista, unique natural areas, wildlife habitats, and aquifer recharge areas).
- Provide intensified land uses adjacent to transportation facilities.
- Utilize open space as a means of preserving and protecting the natural environment.
- Support reasonable air, water, and land quality management programs.
- Review adjoining unincorporated areas, with the goal of obtaining mutual benefits in annexation procedures.
- Acquisition of land for a second landfill site outside the City.
- Develop annexation procedures to ensure the orderly development of the City. Cooperation between City and County should be fostered in efforts to control growth in the three mile area. Examine the following areas for possible future annexation:
    - The area along Fall River Road
    - The west edge of the City (north and south of U.S. Highway 18), including the Municipal Golf Course
    - The area north of Cold Brook
    - The area along U.S. Highway 385 (north of City)
    - The area south of the City along Cascade Road

The plan recognizes the VA Hot Springs facility stating it "should continue to play a major role in the economic vitality of Hot Springs [and] will continue to grow in size and importance." Other objectives included the need to reserve land for future development of public facilities and developing a long-range plan for providing new and expanding facilities to meet the community's needs.

Residential development within the city is separated into two distinct types: suburban residential, which includes areas for medium residential development; and mountain residential, which includes areas that are natural or scenic home site locations. Projected residential development (as of circa 1980) was expected to increase south and east along U.S. Highway 385, north of U.S. Highway 385, west of U.S. Highway 18, and south along Cascade Road.

Major traffic generators identified within the comprehensive plan included the VA Hot Springs campus and other "destination" uses, such as Evans Plunge and the downtown business area. The plan states that these areas with more traffic need to be serviced with adequate streets and lanes to meet expected growth along with the anticipated population increase.

3.8.1.2.4 Rapid City Comprehensive Plan

The Rapid City Comprehensive Plan, updated in 2014, describes how the city's economic vitality is weighted towards tourism, healthcare, retail and the military; however the city's focus is to support efforts to diversify its economic base (Rapid City 2014a). Rapid City has adopted a strategic goal to be "nationally recognized by industry trade measures as a premier regional hub for health care," and to "enhance the quality of healthcare services in the City to assure Rapid City is the regional destination for healthcare."

The purpose of the city's Regional Health Area is to continue to develop primarily as an area for medical uses and to focus on improving pedestrian amenities, infill development, and encouraging mixed land uses. Chapter 5 of the Comprehensive Plan, titled "A Safe, Healthy, Inclusive & Skilled Community (SHIS)," sets goals and policies for accessing health care services. Rapid City recognizes the need for improvement to health care facilities including enhanced access and adding new medical services. The following planning policies endorse health care services development within Rapid City:

- SHIS-3.3A Facility Coordination: Coordinate and collaborate with health and social service providers on the siting of new facilities. Encourage locations that are convenient for clients, and explore options for shared-use facilities to maximize efficiency and client access.
- SHIS-3.3B Multi-Modal Accessibility: Support improvements that increase opportunities for community members to access health and social services.
- SHIS-3.3C Nearby Housing: Encourage housing (especially for the elderly, disabled, low-income and other special populations) in close proximity to health and social service facilities to enhance convenience and provide opportunities for access without needing to drive.
- EC (Economic Stability & Growth)-2.2A Additional Health Care Services and Providers: Attract additional medical services and providers that are not currently present or are under-represented in Rapid City. Identify strategies to enhance and expand the medical services offered in Rapid City, support the expansion of existing health care services and facilities, and market the medical services available to the City.

The above policies encourage community housing, access, and medical services which provide convenient opportunities and reduce travel time for patients. The 2014 Comprehensive Plan further identifies the need to maintain and improve open spaces, park accessibility, and transportation near medical service areas. The plan identifies future land uses surrounding the VA BHHCS Rapid City CBOC for employment purposes located east and west of 5th Street, low residential south of Fox Road, and urban development on the southeastern corner surrounding 5th Street just south of the employment zone. In addition, regional medical facilities are expected to expand around the northern edge of U.S. Highway 16 (Rapid City 2014).

3.8.2 Current Conditions

3.8.2.1 Hot Springs Area

Land use in the Hot Springs area is primarily agriculture, grazing, and recreation. Land surrounding the city is under federal ownership by the U.S. Forest Service for Buffalo Gap National Grasslands and Black Hills National Forest, and by the U.S. Army Corps of Engineers (USACE) for Cold Brook and Cottonwood Springs reservoirs, and under state ownership by the South Dakota Game, Fish, and Parks.

Most of the city lies to the west of U.S. Highway 385 and includes a diverse mix of land uses, utility infrastructure, and road network. The Fall River Hospital is located at the far south end of Hot Springs, just outside the city limits. The Michael J. Fitzmaurice State Veterans Home is located in the northwestern corner of Hot Springs.

The City of Hot Springs Land Use Map and Zoning Ordinance (Hot Springs 2014) shows that land is used and zoned for Class A Residential Development located to the north and south of the VA Hot Springs campus, General Commercial land uses to the west, and Mountain Residential to the east. The land use zones are shown in Figure 3.8-1.

The land use within Hot Springs north of the VA campus is primarily small single family homes, small-scale commercial and retail developments, Evans Plunge recreational facility, and a city park. Land use to the east is undeveloped private land at the foot of Battle Mountain, which is managed for recreation by the South Dakota Game, Fish, and Parks. Land use directly south of the campus is a, moderate density residential neighborhood of single-family homes. Land use directly to the west of the campus is the commercial, retail, and hospitality business area along the historic River Street and the city park that parallels Fall River.

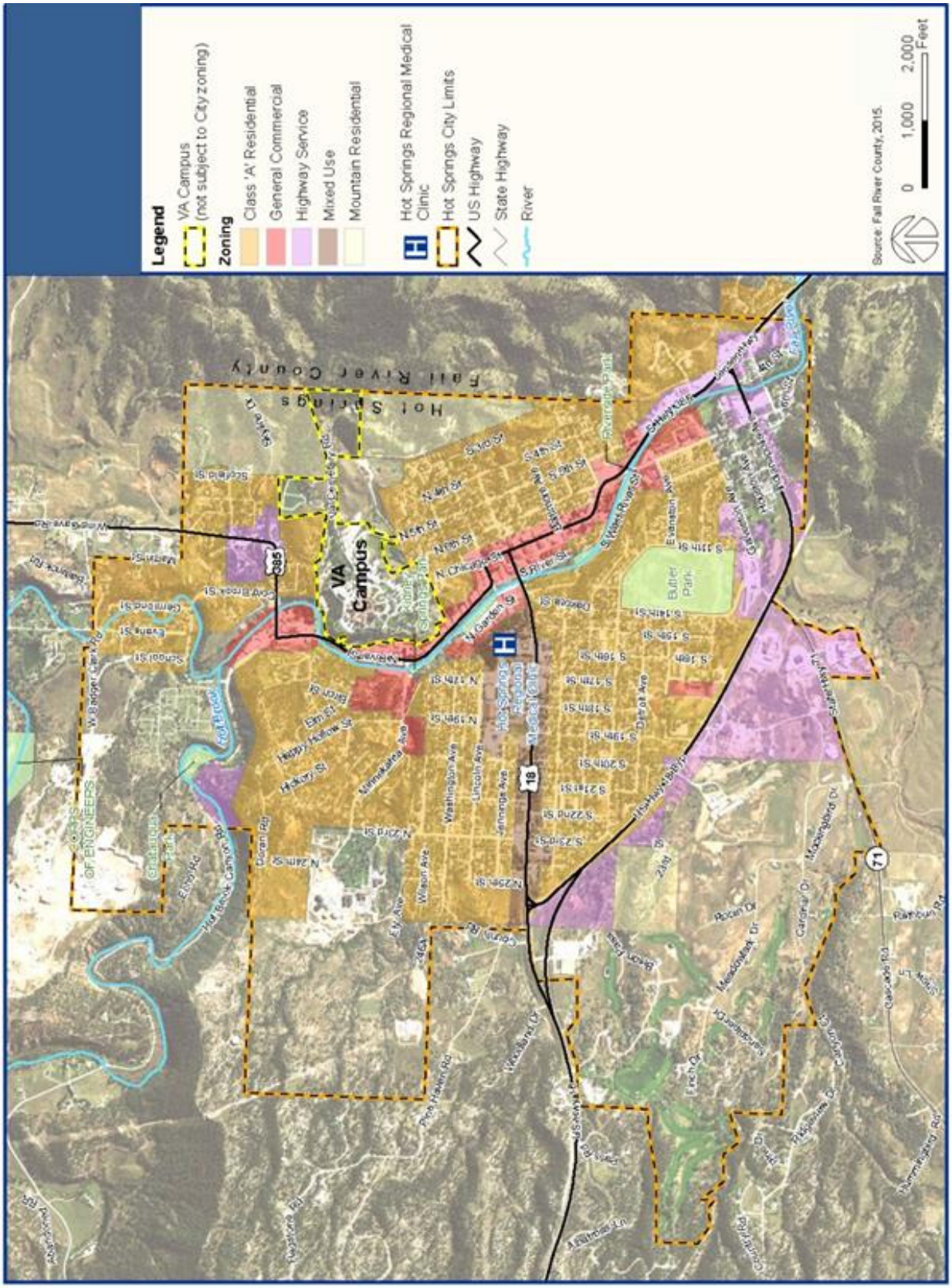


Figure 3.8-1. Hot Springs Zoning.

3.8.2.2 VA BHHCS Hot Springs Campus

The VA Hot Springs campus is located at 500 North 5th Street and encompasses 68 acres. The campus sits on a bluff north and east of the historic River Street business area of Hot Springs and overlooks the Fall River canyon. The campus has approximately 45 buildings connected by a curvilinear system of streets. The campus landscape plan and road system were designed by renowned city planner and architect George Kessler. Land use on the campus includes the medical services and administration complex, infrastructure and maintenance, housing, fire and security, Hot Springs National Cemetery, and open space.

The campus was intended to operate independent of its immediate surroundings, for the most part, and was not designed to incorporate significant physical or functional connections with adjacent lands and uses, with the exception of access. The campus' location on the bluff also segregates it topographically from River Street and commercial and retail uses to the west.

3.8.2.3 Rapid City Area

Rapid City is located along the eastern edge of the Black Hills National Forest within Pennington County. Since the nineteenth century, Rapid City has developed as gateway to the Black Hills. Its location and setting made it an ideal distribution node for the northern plains region, and today it is served by major interstate highways and rail. The city is home to Camp Rapid, a U.S. Army National Guard base located approximately five miles northwest of the existing VA BHHCS CBOC. Ellsworth Air Force Base is just outside the city limits, approximately 15 miles northeast of the clinic. As a well-developed community, Rapid City has a full complement of public facilities including numerous parks, golf courses, and lakes. Regional and community health centers, and public and private schools are generally located east of U.S. Highway 16, south of Interstate 90 and north of Catron Boulevard.

Shown in Figure 3.8-2, the future land use map for Rapid City depicts the land use patterns across the city. It identifies specific land use categories, centers, and corridors associated with different locations or types of places within the community. Figure 3.8-3 shows the location and type of zoning within Rapid City. Future zone changes would generally adhere to the land use categories shown on the land use map.

3.8.2.4 VA BHHCS Community-Based Outpatient Clinic

The VA BHHCS CBOC is located on 5th Street at Fox Run Drive in Rapid City. The CBOC is adjacent to the Colonial and Robbinsdale neighborhoods. According to the city's Planning Boundaries Map (Rapid City 2014), the VA BHHCS CBOC is located within the U.S. Highway 16 Neighborhood Area, the land use category is Employment (see Figure 3.8-2), and the area is currently zoned Office Commercial on the city's zoning map (see Figure 3.8-3).

The CBOC is surrounded by multi- and single-family developments, with a mix of apartments and homes defining the area as a suburban location. The surrounding zoning districts include Office Commercial, Low-Density Residential 1, Medium-Density Residential, General Commercial, and Civic Center.

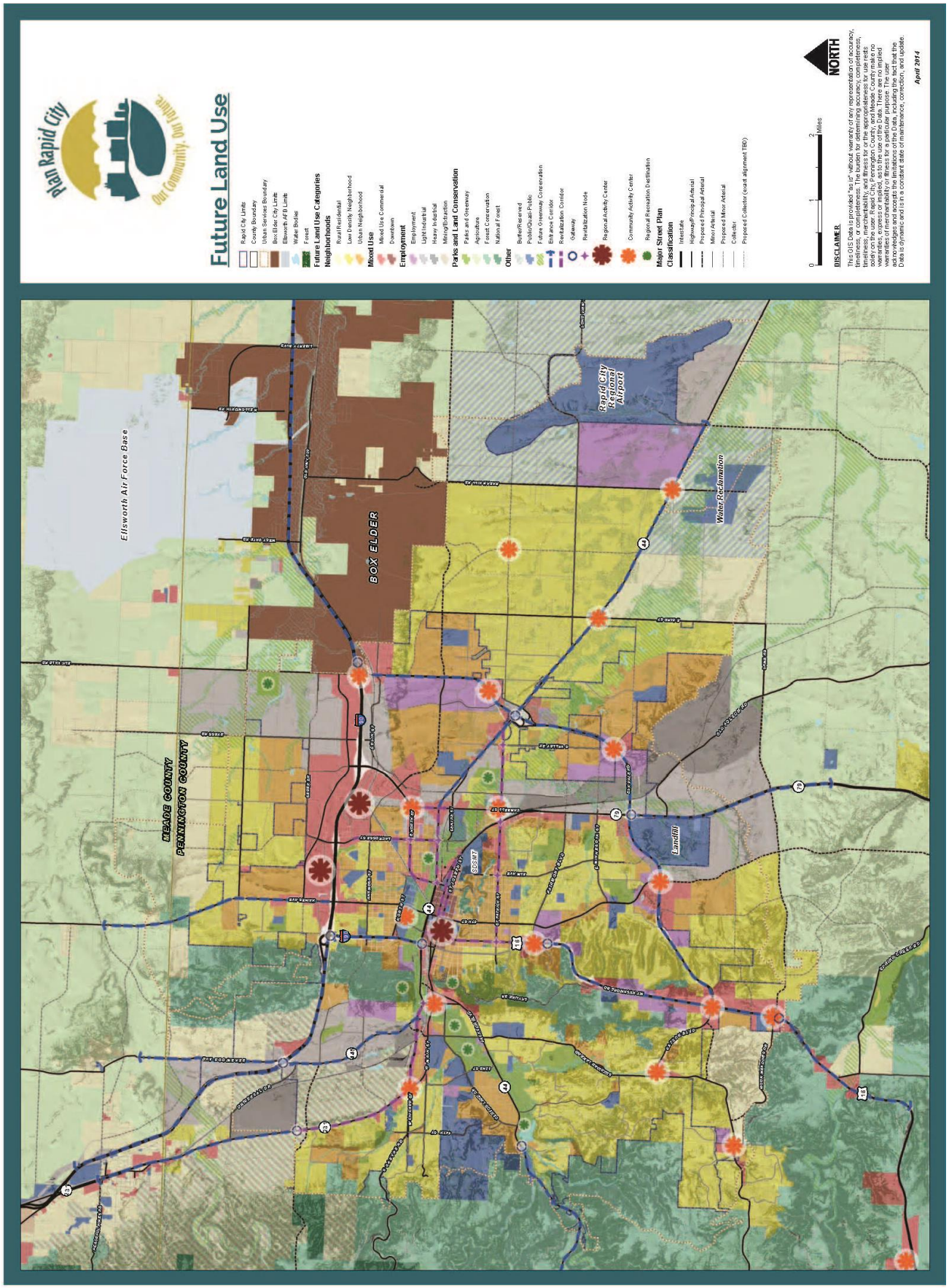


Figure 3.8-2. Rapid City Future Land Use.

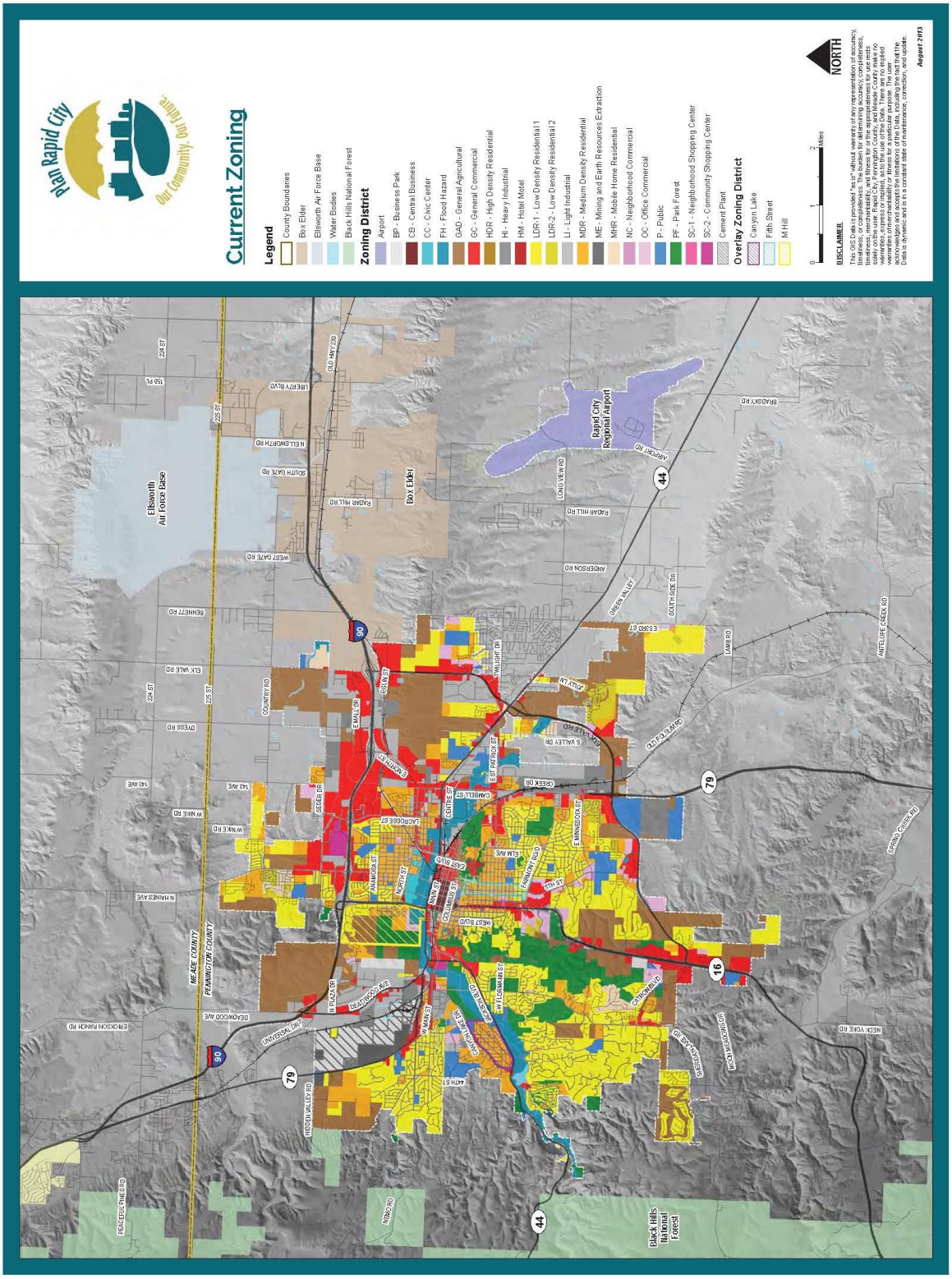


Figure 3.8-3. Rapid City Zoning.

3.9 Floodplains and Wetlands

A floodplain is the low-lying area adjacent to a river or stream that is periodically subject to flooding. A wetland is an area that is inundated or saturated by surface or groundwater and supports hydrophytic vegetation.

3.9.1 Regulatory and Policy Framework

Development in floodplains is regulated through the National Flood Insurance Program administered by the Federal Emergency Management Agency (FEMA) and managed through mutual agreements with local governments. The program regulates development in special flood hazard areas to prevent flooding, protect human health and safety, and minimize property damage caused by flooding. Special flood hazard areas are those areas subject to inundation by the one percent annual chance flood (commonly referred to as the 100-year flood). FEMA models the flooding potential within communities and delineates special flood hazard zones (collectively referred to as the 100-year floodplain) and other flood areas, which are published on Flood Insurance Rate Maps (FIRM). Designated flood-prone areas within the City of Hot Springs are regulated by its Code of Ordinances, Chapter 31, Flood Damage Prevention. Special flood hazard areas within the City of Rapid City are regulated by its Code of Ordinances, Chapter 32.15, Flood Area Construction Regulations.

Federal agencies are required to avoid or minimize actions that could adversely affect floodplains (Executive Order 11988, *Floodplain Management*; see Section 1.5). The VA Site Development Design Manual (VA 2013) provides direction for planning, siting, and designing VA facilities. The manual states that when siting a facility, floodplain functions should be protected by avoiding or limiting development within the 100-year floodplain. Development in floodplains should be limited to open spaces and recreation areas first, parking areas second, and structures only if absolutely necessary.

Development in wetlands is regulated under the *Clean Water Act* and as authorized by USACE, and by farmland conservation programs administered by the Natural Resources Conservation Service. Regulating the filling of wetlands is primarily to avoid damage to aquatic environments and to prevent degradation of water quality. Three indicators (hydric soil, hydrophytic vegetation, and wetland hydrology) must be present during some portion of the growing season to define an area as a wetland within the regulatory jurisdiction of the USACE. Although not all-encompassing, the National Wetland Inventory (NWI) maintained by FWS provides location information on possible wetlands. Not all wetlands shown on the NWI would meet the criteria required to delineate a regulated wetland. Federal agencies are required to avoid filling or modifying wetlands to the extent practicable (Executive Order 11990, *Protection of Wetlands*; see Section 1.5).

3.9.2 Current Conditions

3.9.2.1 VA Hot Springs Campus

The VA Hot Springs campus is located atop a bluff overlooking the Fall River that flows along the base of the bluff on the west and north. The campus sits about 100 feet above the Fall River channel, which is delineated on the Hot Springs FIRM (FEMA 2007) as a regulated floodway. There is minimal flood risk with no rivers, streams, or other surface water bodies on the campus. The campus is outside the 0.2 percent annual chance flood (commonly referred to as the 500-year flood),

which is labeled on the FIRM as an unshaded Zone X. The FIRM does not show any special flood hazard areas and the NWI (FWS 2015) does not identify any wetlands on the campus.

3.9.2.2 City of Hot Springs

The City of Hot Springs participates in the National Flood Insurance Program; the FIRM for the city was updated in 2007. The flood hazards are primarily Fall River, which flows approximately through the center of the city from north to south; Cold Brook Canyon Creek, which enters Fall River near the north end of the city; and an unnamed tributary, which enters Fall River along the south end of the city. The FEMA-designated 100-year floodplain in Hot Springs is shown on Figure 3.9-1.

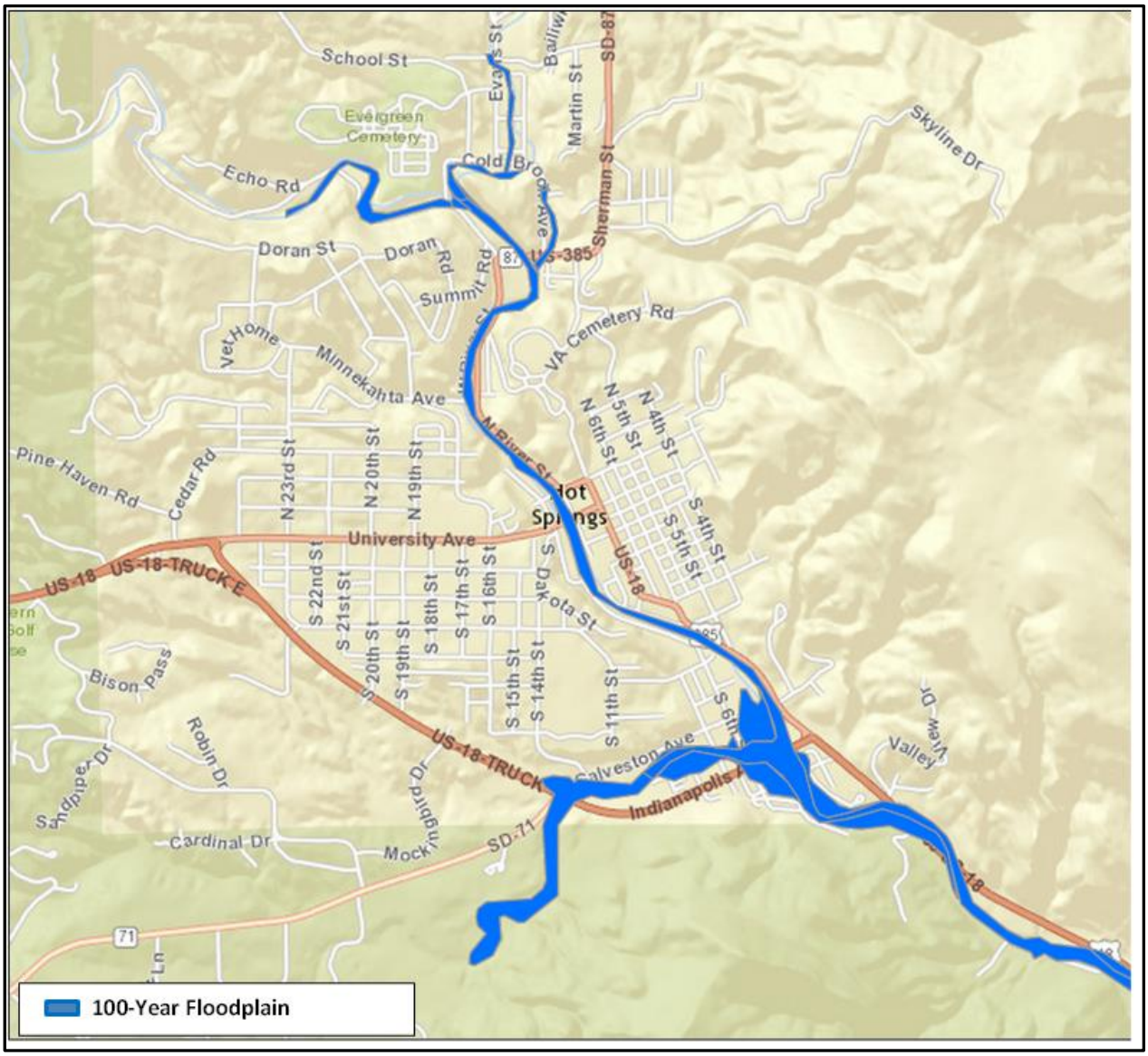


Figure 3.9-1. Location of Flood-Prone Areas in Hot Springs.

As a regulated floodway, the channel and adjacent floodplain of Fall River must be kept free of encroachment to carry the 100-year flood. The floodplain is generally less than 150 feet wide through most of the city except at the confluence area with the unnamed tributary near the U.S. Highway 18 bypass intersection.

The unnamed tributary and Cold Brook Canyon Creek have designated areas subject to flooding by a 100-year flood. The 100-year floodplain of the unnamed tributary begins in Fall River County outside the south edge of the Hot Springs corporate limits and extends to the confluence with Fall River near U.S. Highway 18/385. The width of the floodplain varies from 200 to 400 feet and approaches 800 feet in the confluence area. The designation of the 100-year floodplain of Cold Brook Canyon Creek begins at the west edge of the Hot Springs corporate limits and extends to the confluence with Fall River. The width of the floodplain is mostly less than 100 feet but approaches approximately 150 to over 250 feet through a bend and at the confluence.

Fall River is considered "waters of the U.S." and is therefore subject to the regulatory jurisdiction of USACE under the *Clean Water Act*. The NWI identifies an area of approximately one-half acre adjacent to Fall River between Jennings Avenue and U.S. Highway 18 as a wetland. It is defined as a riverine wetland with surface water present throughout the year except during times of drought. The NWI shows two other smaller wetlands less than one-quarter acre each located in the far northeast corner of the city. One is defined as seasonally flooded with emergent vegetation and the other is defined as a manmade pond. Two additional wetlands less than one-quarter acre and identified as manmade excavations are located southwest of the U.S. Highway 18 bypass.

3.9.2.3 City of Rapid City

The City of Rapid City participates in the National Flood Insurance Program; the FIRM for the city was updated in 2013. The flood hazards are primarily Rapid Creek, which flows through a major portion of the city from the southwest to the southeast, and a number of named and unnamed tributaries and drainages to Rapid Creek. The FEMA-designated special flood hazard zones and other flood areas in Rapid City are shown on Figure 3.9-2.

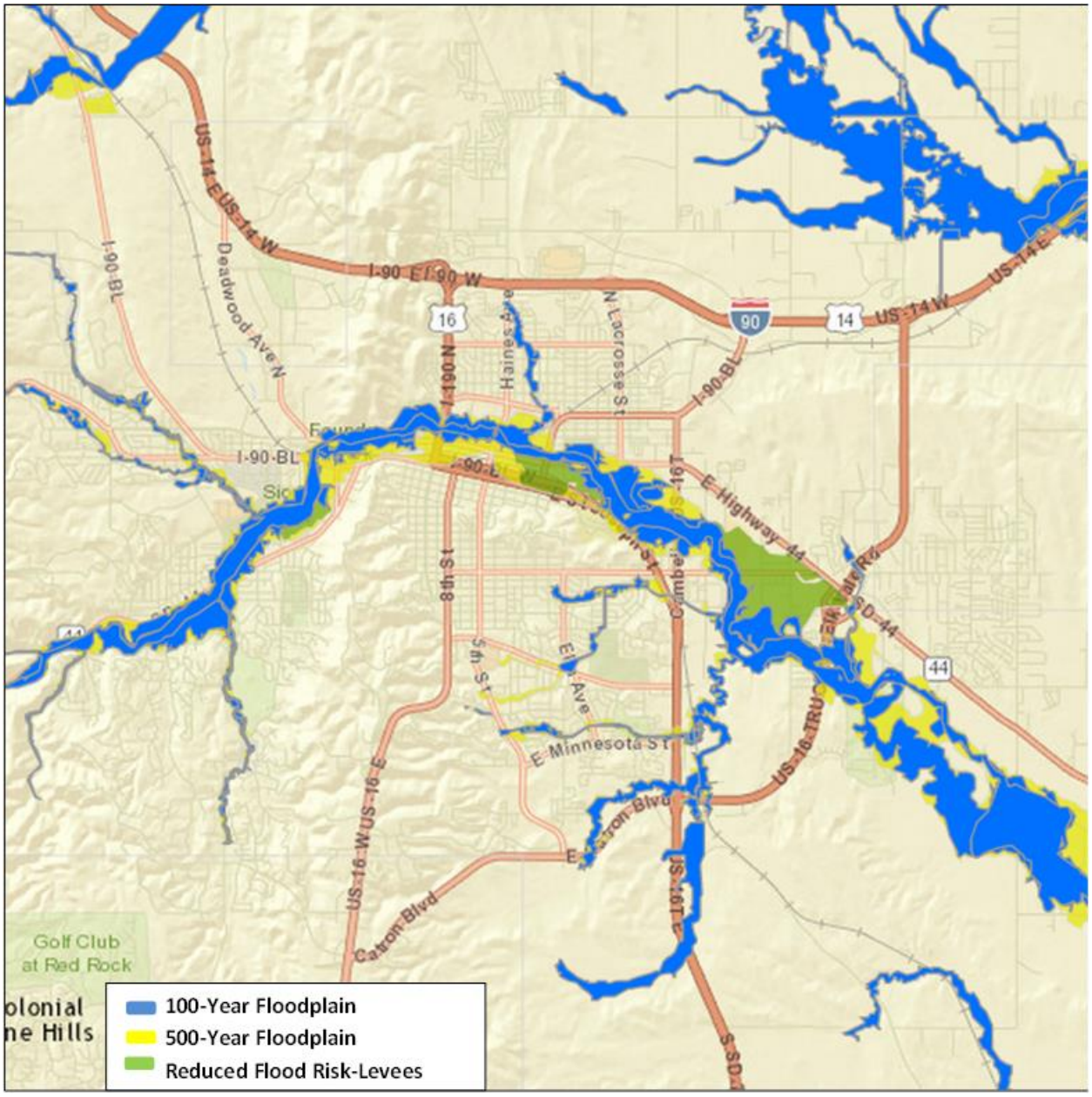


Figure 3.9-2. Location of Flood-Prone Areas in Rapid City.

The City of Rapid City implemented an extensive floodplain management program in the aftermath of the 1972 floods. Most of the 100-year floodplain of Rapid Creek has been converted to greenway occupied by parks, trails, golf courses, and open spaces. Flood hazard zones along Rapid Creek include the regulated floodway, 100- and 500-year floodplains, and areas of reduced flood risk due to levees. These flood-prone areas are extensive and collectively encompass many city blocks reaching over one-half mile in width in most locations.

Rapid Creek is considered "waters of the U.S." and is therefore subject to the regulatory jurisdiction of USACE under the *Clean Water Act*. The NWI shows numerous areas as wetlands of different shapes, sizes, and lengths throughout Rapid City, with most being located within or near the 100- and 500-year floodplains. The wetlands include seasonally and permanently flooded ponds (natural and manmade), seasonally and temporarily flooded palustrine wetlands with emergent vegetation, and temporarily flooded palustrine wetlands with forested vegetation.

The location of the existing CBOC is labeled on the FIRM as within unshaded Zone X, which is outside the 500-year floodplain in an area of minimal flood risk. Across 5th Street to the east of the CBOC, the NWI shows a temporarily flooded palustrine wetland with forested vegetation of approximately one-half acre. The wetland was created or modified by manmade flow obstructions.

3.10 Socioeconomics

Socioeconomics are described using demographic and employment measures, as these measures influence the local economy and housing demand.

3.10.1 Regulatory and Policy Framework

There are no federal standards relating to socioeconomics that apply to VA, and no state or local requirements to address. The regulatory framework for addressing socioeconomics is in the context of the human environment referred to in NEPA and defined by the CEQ regulations implementing NEPA. Economic or social effects will be discussed in an EIS when interrelated with the natural and physical environment (40 CFR 1508.14).

3.10.2 Current Conditions

The VA BHHCS service area covers approximately 100,000 square miles and includes 34 counties in South Dakota, Nebraska, and Wyoming. Socioeconomic data are presented by the following groupings:

- Fall River County, South Dakota: location of the VA Hot Springs campus and where components of the proposed reconfiguration would occur.
- Pennington County, South Dakota: location where components of the proposed reconfiguration would occur.
- Other South Dakota Counties: counties within the VA BHHCS service area, including Bennett, Butte, Corson, Custer, Dewey, Haakon, Harding, Hughes, Jackson, Jones, Lawrence, Lyman, Meade, Mellette, Oglala Lakota, Perkins, Stanley, Todd, Tripp, and Ziebach.
- Nebraska Counties: counties within the VA BHHCS service area, including Box Butte, Cherry, Dawes, Garden, Grant, Morrill, Scotts Bluff, Sheridan, and Sioux.
- Wyoming Counties: counties within the VA BHHCS service area, including Crook, Niobrara, and Weston.

3.10.2.1 Population

The total population within the VA BHHCS service area using the 2010 census was 349,864 people. As shown in Table 3.10-1, the population in the VA BHHCS service area is projected to increase by 10.5 percent between 2010 (349,864) and 2030 (386,625). Pennington County is projected to experience the highest population growth rate at 24 percent, while the population of Fall River County is projected to increase by 6.8 percent through 2030. The other South Dakota counties and Wyoming counties are projected to experience growth of 11.5 percent and 16.4 percent, respectively, while the Nebraska counties are projected to lose population (-10.0 percent).

Table 3.10-1. Current and Projected Population in VA BHHCS Service Area.

Counties in VA BHHCS Service Area	Population					Change 2010–2030
	2010	2015	2020	2025	2030	
Fall River, South Dakota	7,094	7,262	7,394	7,500	7,575	+6.8%
Pennington, South Dakota	100,948	107,845	114,161	119,876	125,154	+24.0%
Other South Dakota	148,284	152,799	157,397	161,647	165,282	+11.5%
Nebraska	76,763	75,125	73,286	71,240	69,094	-10.0%
Wyoming	16,775	17,810	18,600	19,070	19,520	+16.4%
Total	349,864	360,841	370,838	379,333	386,625	+10.5%

Source: Census 2010; SD DLR 2015a; UnivNE 2009; WY DAI 2011.

3.10.2.2 Veteran Population

The Veteran population projection in the VA BHHCS service area for the fiscal year ending September 30, 2014 (FY 2014) was 35,007 Veterans. Table 3.10-2 shows the projected Veteran population through FY 2030 by the counties in the service area, along with the percent change over this time period. The population projections are those developed by VA's National Center for Veteran Analysis and Statistics; these projections of county-level Veteran population changes are the basis for VA's nationwide services and facilities planning. This analysis was based on the most recent projections available, which were modeled using 2013 Veteran population estimates. With the exception of Pennington County, the Veteran population is projected to decrease throughout the VA BHHCS service area with an overall decline (35,007 to 33,755) of 3.6 percent by the end of FY 2030.

Table 3.10-2. Projected Veteran Population in VA BHHCS Service Area.

Counties in VA BHHCS Service Area	Veteran Population				Change 2014–2030
	FY 2014	FY 2020	FY 2025	FY 2030	
Fall River, South Dakota	1,013	968	933	882	-12.9%
Pennington, South Dakota	12,433	12,767	12,919	12,973	+4.3%
Other South Dakota	14,136	13,699	13,263	12,931	-8.5%
Nebraska	5,733	5,592	5,481	5,352	-6.6%
Wyoming	1,692	1,661	1,634	1,617	-4.4%
Total	35,007	34,657	34,230	33,755	-3.6%

Source: VA 2015a.

Approximately 60 percent of the Veteran population in the VA BHHCS service area was enrolled in the VA health benefits program in FY 2014 (VA 2015a). Although the Veteran population is projected to decrease by FY 2030, enrollment to receive health care services is projected to increase to approximately 62 percent (VA 2015a).

3.10.2.3 Housing

Table 3.10-3 shows the number of housing units and the occupancy rate in the VA BHHCS service area between 2000 and 2010. A housing unit is defined by the U.S. Census Bureau as a house, apartment, mobile home or trailer, group of rooms, or a single room that is intended for occupancy

as separate living quarters. The total number of housing units increased (144,645 to 160,220) by 10.8 percent, with Pennington County having the largest increase (37,249 to 44,949) at 20.7 percent and the Nebraska counties having the smallest increase (36,831 to 37,193) at 1.0 percent. Although the number of housing units increased across the service area, the occupancy rate of those units decreased slightly (87.8 to 87.2 percent). The exception is the Wyoming counties, with a small occupancy increase of 3.6 percent. Pennington County had the highest 2010 occupancy rate at 91.8 percent and Fall River County had the lowest rate at 78.1 percent. Fall River County also had the largest change in occupancy with a decrease of 3.9 percent. Approximately one-third of the occupied housing units are by renters in the counties throughout the service area, except for the Wyoming counties where renters occupy approximately one-fourth of the housing units (Census 2010).

Table 3.10-3. Housing Units in VA BHHCS Service Area.

Counties in VA BHHCS Service Area	Housing Units		Occupancy Rate		Change 2000–2010	
	2000	2010	2000	2010	Units	Rate
Fall River, South Dakota	3,812	4,191	82.0%	78.1%	9.9%	-3.9%
Pennington, South Dakota	37,249	44,949	93.0%	91.8%	20.7%	-1.2%
Other South Dakota	59,249	65,421	86.0%	85.6%	10.4%	-0.4%
Nebraska	36,831	37,193	87.7%	86.5%	1.0%	-1.2%
Wyoming	7,504	8,466	79.2%	82.8%	12.8%	+3.6%
Total	144,645	160,220	87.8%	87.2%	10.8%	-0.6%

Source: Census 2010.

VA BHHCS contracts for health care professionals, including physician staffing services (locum tenens) and other support personnel on an as-needed basis to augment VA staff. These contract or fee-based positions amounted to approximately $678,000 for FY 2014 (VA 2015b). VA BHHCS also purchases care for Veterans from non-VA providers, which amounted to approximately $25.9 million in FY 2011 (VA 2012).

3.10.2.4 Income

Median household income from the 2010 census is used as a benchmark to evaluate income levels in the VA BHHCS service area. Census data is readily available and is generally a more reliable source, particularly for small counties like the ones that are in the service area. While more current data is available from the U.S. Bureau of Economic Analysis, personal income data from this source is not considered to be as reliable because income levels of groups atypical of the resident population may cause a longer term high or low per capita personal income that is not indicative of the economic well-being of the area (BEA 2014). For example, a major construction project could substantially raise the per capita personal income of an area for several years because it attracts highly paid workers whose incomes are measured at the construction site instead of their county of residence.

Table 3.10-4 shows the change in estimated median household income for the VA BHHCS service area between 2000 and 2010. The entire service area had large increases in median household income, with the most significant increase of 56.1 percent in the three counties in Wyoming. Fall River County had both the lowest median income ($29,631 and $35,833) and the smallest increase at 20.9 percent. Although there were individual counties in the three states with lower median incomes than Fall River County, the average by data groupings for Other South Dakota, Nebraska, and Wyoming counties was higher.

Table 3.10-4. Median Household Income in VA BHHCS Service Area.

Counties in VA BHHCS Service Area	Median Household Income		Change 2000–2010
	2000	2010	
Fall River, South Dakota	$29,631	$35,833	20.9%
Pennington, South Dakota	$37,485	$46,849	25.0%
Other South Dakota	$30,943	$42,645	37.8%
Nebraska	$30,690	$38,403	25.1%
Wyoming	$31,667	$49,440	56.1%
Total[1]	$32,083	$42,634	32.9%

[1] Represents the average of the median household incomes.
Source: Census 2010.

3.10.2.5 Labor Force and Employment Characteristics

The U.S. Bureau of Labor Statistics defines the labor force as civilians (not active duty military or institutionalized persons) 16 years and older who are employed, seeking employment, or unemployed and available to work. Table 3.10-5 shows the number of persons who were employed compared to the size of the labor force in the VA BHHCS service from 2010 through 2014. The total labor force in the service area fluctuated slightly between 2010 (181,978) and 2013 (182,322) and then dropped to 178,422 in 2014. The trend in the number of persons employed tracked with the total labor force. Employment increased each year from 2010 to 2013, and then in 2014 the number of persons employed (171,496) dropped below the 2010 level (172,336). This would not be unexpected since the labor force in 2014 was also smaller than it was in 2010. While the overall change to the total labor force in the service area from 2010 to 2014 (181,978 to 178,422) decreased by 2.0 percent, the number of persons employed only decreased by 0.5 percent. Only the three Wyoming counties in the service area experienced both an increase in their total labor force (9.5 percent) and employment (12.2 percent) over the past five years. Although the total labor force decreased in Pennington County (0.7 percent) and the Nebraska counties (0.3 percent) between 2010 and 2014, the number of persons employed increased by 1.2 percent.

Table 3.10-6 shows the number of unemployed persons in the VA BHHCS service area along with the unemployment rate from 2010 to 2014. All county groupings within the service area had sizeable decreases in the number of unemployed persons, along with improvements (decreases) in the unemployment rate. The Nebraska and Wyoming counties had the largest decreases in unemployed persons at 30.8 and 33.1 percent, respectively, while the service area counties in South Dakota had decreases between approximately 21 to 36 percent. The largest decrease in the unemployment rate from 2010 to 2014 was in the Wyoming counties with a decrease of 2.3 percentage points from 6.0 to 3.7 percent. Pennington County was next with a decrease of 1.8 percentage points from 5.2 to 3.4 percent. The Nebraska counties had the lowest unemployment rate in the service area over the past five years from 4.8 percent down to 3.3 percent. The unemployment rate in Fall River County and the other South Dakota counties improved by 0.9 and 1.0 percentage points, respectively. For comparison purposes, the 2014 statewide unemployment rates for South Dakota, Nebraska, and Wyoming were 3.4, 4.3, and 3.3 percent, respectively (SD DLR 2015b; NE DOL 2015; WY LMI 2015).

Table 3.10-7 provides overview information on the different employment sectors, establishments, employees, and average and total wages for Fall River County and Pennington County for 2014.

Table 3.10-5. Labor Force and Employment in VA BHHCS Service Area, 2014.

Counties in VA BHHCS Service Area	Total Labor Force (Total) and Persons Employed (Empl)										Change 2010–2014	
	2010		2011		2012		2013		2014			
	Total	Empl	Total	Empl	Total	Empl	Total	Empl	Total	Empl	Total	Empl
Fall River, South Dakota	3,815	3,607	3,741	3,548	3,677	3,499	3,632	3,473	3,026	2,886	-20.7%	-20.0%
Pennington, South Dakota	54,063	51,251	54,881	52,299	54,783	52,451	55,056	52,946	53,691	51,878	-0.7%	+1.2%
Other South Dakota	74,330	70,180	73,427	69,274	72,887	68,972	72,710	69,057	71,295	68,022	-4.1%	-3.1%
Nebraska	41,500	39,527	42,082	40,265	42,391	40,694	42,741	41,086	41,358	39,992	-0.3%	+1.2%
Wyoming	8,270	7,771	8,188	7,741	8,320	7,914	8,183	7,830	9,052	8,718	+9.5%	+12.2%
Total	181,978	172,336,	182,319	173,127	182,058	173,530	182,322	174,392	178,422	171,496	-2.0%	-0.5%

Source: BLS 2015.

Table 3.10-6. Unemployment and Unemployment Rate in VA BHHCS Service Area.

Counties in VA BHHCS Service Area	Persons Unemployed (Unempl) and Unemployment Rate (Rate)										Change 2010-2014	
	2010		2011		2012		2013		2014			
	Unempl	Rate	Unempl	Rate	Unempl	Rate	Unempl	Rate	Unempl	Rate	Unempl	Rate
Fall River, South Dakota	208	5.5%	193	5.2%	178	4.8%	159	4.4%	140	4.6%	-32.7%	-0.9%
Pennington, South Dakota	2,812	5.2%	2,582	4.7%	2,332	4.3%	2,110	3.8%	1,813	3.4%	-35.5%	-1.8%
Other South Dakota	4,150	5.6%	4,153	5.7%	3,915	5.4%	3,653	5.0%	3,273	4.6%	-21.1%	-1.0%
Nebraska	1,973	4.8%	1,817	4.3%	1,697	4.0%	1,655	3.9%	1,366	3.3%	-30.8%	-1.5%
Wyoming	499	6.0%	447	5.5%	406	4.9%	353	4.3%	334	3.7%	-33.1%	-2.3%
Total	9,650	5.3%	9,437	5.2%	8,793	4.8%	8,171	4.5%	7,242	4.1%	-25.0%	-1.2%

Source: BLS 2015.

Table 3.10-7. Employment Sectors and Wages, Fall River County (FRC) and Pennington County (PC).

Employment Sector	Establishments		Employees		Average Wage		Total Wages	
	FRC	PC	FRC	PC	FRC	PC	FRC	PC
Industry (total private ownership)	250	4,377	1,351	47,680	$25,794	$36,765	$34,847,153	$1,752,947,009
Natural resources/mining	12	33	53	146	$41,348	$33,639	$2,191,442	$4,911,288
Construction	26	516	81	3,635	$27,181	$42,577	$2,201,630	$154,766,796
Manufacturing	8	138	15	2,639	$31,563	$43,119	$473,443	$113,791,333
Trade/transportation/utilities	49	1,027	278	11,888	$25,847	$33,452	$7,185,466	$397,676,287
Information	4	83	25	875	$48,866	$42,188	$1,221,640	$36,914,837
Financial activities	24	471	60	3,755	$36,733	$43,944	$2,203,968	$165,008,811
Professional/business services	40	824	83	4,628	$32,133	$49,758	$2,667,018	$230,281,192
Education/health services	24	437	323	9,651	$34,243	$47,313	$11,060,351	$456,622,256
Leisure/hospitality services	45	511	385	8,376	$12,759	$15,961	$4,912,241	$133,687,185
Other services	18	337	49	2,089	$14,897	$28,381	$729,954	$59,287,024
Government	44	136	1,040	7,761	$40,238	$43,285	$41,847,893	$335,932,253
Total (Government and Industry)	**294**	**4,513**	**2,391**	**55,441**	**$32,077**	**$37,678**	**$76,695,046**	**$2,088,879,262**

Source: SD DLR 2015c.

Only these two counties within the VA BHHCS service area are listed because they are the counties where the proposed reconfiguration would occur. The information in the table is intended to provide an overview of employment sector information, and the reader should note that the data are not inclusive of all workers because of how data are collected from and reported for private industry, government, self-employed, and religious and non-profit organizations.

As shown in Table 3.10-7, private industry in Fall River County employed approximatley one-third more persons (1,351) than did the government (local, state, and federal) sector (1,040), yet accounted for approximately $7 million less in total wages ($34.8 to $41.8 million) in 2014. The highest average wage in Fall River County was in the natural resources/mining sector ($41,348) and the lowest was in the leisure/hospitality sector ($12,759). The construction sector was very small with only 81 employees earning an average wage of $27,181. The education/health services sector was larger with 24 establishments supporting 323 employees earning an average wage of $34,243.

As shown in Table 3.10-7, private industry in Pennington County employed significantly more persons (47,680) than did the government sector (7,761) and accounted for approximately five times the total wages ($1.75 billion to $333.9 million) in 2014. The highest average wage in Pennington County was in the professional/business services sector ($49,758) with the lowest in the leisure/hospitality sector ($15,961). The construction sector had 3,635 employees earning an average wage of $42,577. The education/health services sector had 437 establishments supporting 9,651 employees earning an average wage of $47,313.

3.10.2.6 VA BHHCS Employment

VA BHHCS employed 1,103 people (1,021 full-time and 82 part-time) in FY 2014 (VA 2015b). This equates to 1,069 full-time equivalent employees (FTEEs) assigned to the VA facilities in Hot Springs (357 FTEEs), Rapid City (30 FTEEs), and Fort Meade (682 FTEEs). One FTEE represents either one full-time employee working 40 hours per week, or two or more part-time employees whose combined working hours total to 40 hours per week. Table 3.10-8 shows the location assignment of the FTEEs for FY 2014 by the county of residence of the employees associated with those FTEEs. Fall River County and Pennington County are listed separately because they are the counties where the proposed reconfiguration would occur. The "Other" counties include the remaining counties within the VA BHHCS service area and others outside the service area.

Table 3.10-8. VA BHHCS FTEEs by VA Facility and Employee County of Residence.

FTEE County of Residence	Hot Springs Campus	Rapid City CBOC	Fort Meade Campus	Total
Fall River	266	0	6	272
Pennington	39	26	149	214
Other	52	4	527	583
Total	357	30	682	1,069

Source: VA 2015b.

Table 3.10-9 shows the estimated total wages earned by VA BHHCS employees for FY 2014. The wages are listed by VA facility and county of residence of the FTEEs earning the wages at that facility.

Table 3.10-9. VA BHHCS Estimated Total Wages by VA Facility and FTEE County of Residence

FTE County of Residence	Hot Springs Campus	Rapid City CBOC	Fort Meade Campus	Total
Fall River	$16,377,677	$0	$406,248	$16,783,925
Pennington	$2,401,238	$2,020,316	$10,088,504	$14,510,058
Other	$3,201,651	$310,818	$35,682,157	$39,194,626
Total	$21,980,566	$2,331,135	$46,176,909	$70,488,609

Source: VA 2015b.

3.11 Community Services

Community services are provided by public and non-profit agencies and organizations to support and enhance the community with educational, protective, medical, and recreational services. These services include local community hospitals and clinics, fire/rescue and emergency medical services, law enforcement, local schools, and parks and recreation facilities.

3.11.1 Regulatory and Policy Framework

Legislation, regulations, and plans govern local government responsibilities for providing community services. No state or local requirements related to community services apply to VA.

VA acts as its own building and fire protection official and "authority having jurisdiction". As such, VA reviews fire code requirements during the design and construction phases of a project. VA may also conduct an evaluation of the emergency response services (including local fire departments) available to facility operations. Construction and operation of a dedicated VA fire department are included in project plans when required to support VA medical facilities operating 24 hours a day in communities where fire response is provided by volunteers instead of full-time, 24-hour fire response staff. A support agreement or mutual aid agreement may be prepared to document shared fire response services. A police and security unit is staffed 24 hours a day at VA facilities operating 24 hours a day to provide physical security and monitor law enforcement activities for the protection of persons and VA property. VA Handbook 0730 *Security and Law Enforcement* (VA 2014) requires the establishment of a support agreement with local law enforcement agencies.

3.11.2 Current Conditions

Figures 3.11-1 and 3.11-2 identify the locations of the community services in the Hot Springs and Rapid City areas described in the following subsections.

3.11.2.1 Hospitals and Clinics

In the VA BHHCS service area, there are 3 tertiary care hospitals, 18 critical access hospitals, 5 Indian Health Services hospitals, 3 Indian Health Services health care centers, and numerous primary care clinics.

3.11.2.1.1 Hot Springs and Fall River County

The VA Hot Springs hospital and clinic serve Veterans predominately from the VA BHHCS service area. Services provided at the VA Hot Springs campus include primary care, urgent care, pharmacy services, outpatient surgery, inpatient care (10 beds), dialysis, x-ray and mobile imaging, specialty care, laboratory services, mental health, and a call center. There are also seven beds for long-term care in a Community Living Center (nursing home) and 100 beds for the RRTP that serves homeless Veterans and provides mental health services for post-traumatic stress, substance abuse, alcohol abuse, and other conditions.

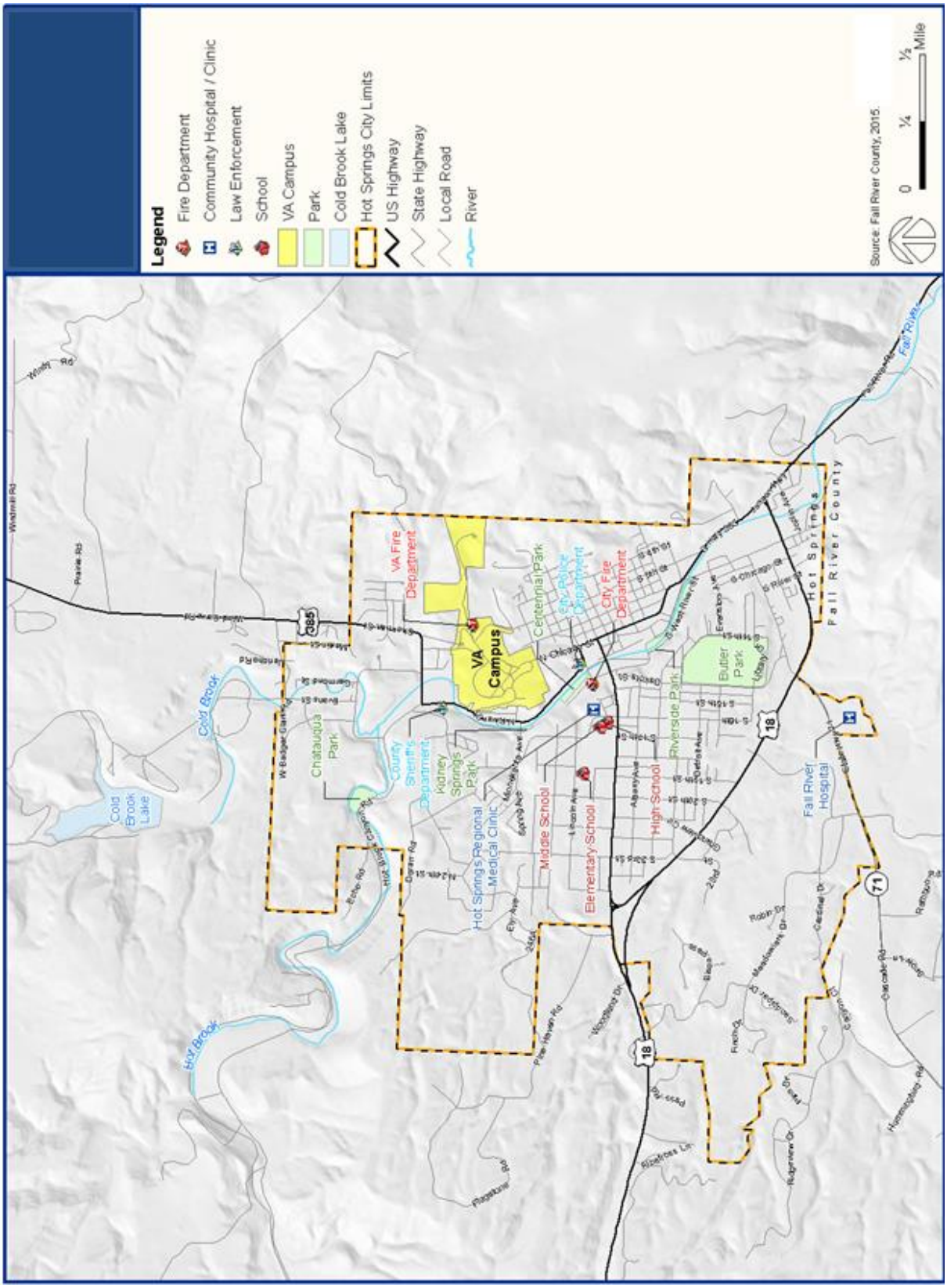


Figure 3.11-1. Hot Springs Community Services.

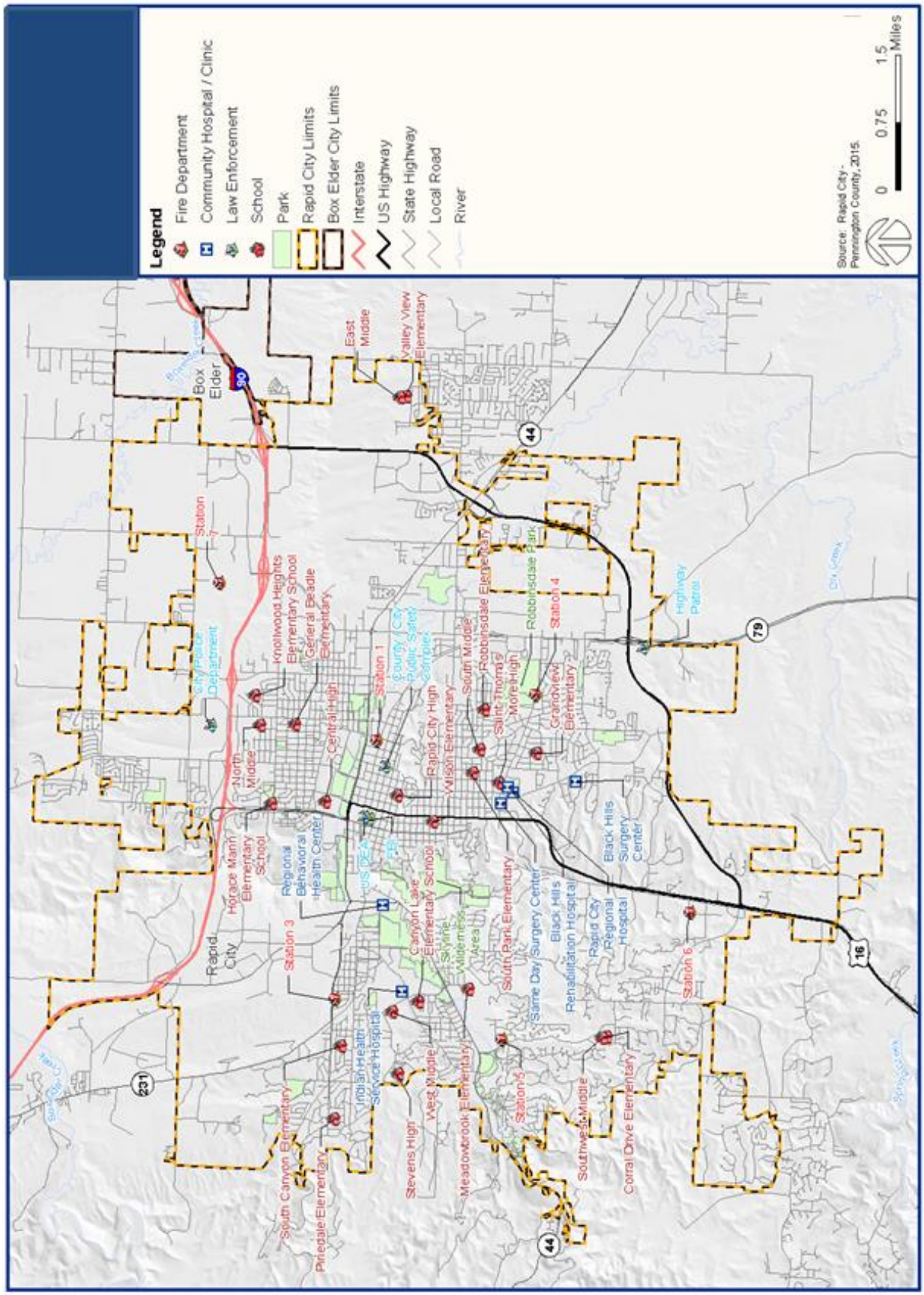


Figure 3.11-2. Rapid City Community Services.

Fall River Health Services operates the Fall River Hospital, Rural Health Clinic, and Seven Sisters Living Center in Hot Springs. The hospital is designated by the U.S. Department of Health and Human Services as a critical access hospital. The hospital has 25 inpatient beds and provides services for acute (urgent) and emergency care, laboratory, medical imaging, ultrasound, physical therapy and rehabilitation, surgery, orthopedics, podiatry, and sleep studies. Fall River Hospital employees two physicians and two nurse practitioners; contracts four emergency medicine physicians and four outreach specialty physicians; and has additional nursing, patient care, and service and facility support staff (Fall River Health Services 2013).

Hot Springs Regional Medical Clinic operates Monday through Friday from 9:00 a.m. to 4:00 p.m. It offers family and internal medicine services and specialties in audiology, counseling, endocrinology, nephrology, urology, and surgical practices.

3.11.2.1.2 Rapid City and Pennington County

The VA CBOC in Rapid City serves Veterans primarily from the Rapid City area. The facility provides primary care, specialty care, and compensated work therapy.

Rapid City Regional Hospital is an urban hospital serving the communities in Pennington County and the Black Hills region. The hospital has an inpatient capacity of 329 beds and provides specialty medical, surgical, and intensive care (tertiary) services. Rapid City Regional Hospital is one of the three tertiary hospitals in the VA BHHCS service area; the other two are located in Pierre and Scottsbluff.

3.11.2.2 Fire/Rescue and Emergency Medical Services

3.11.2.2.1 Hot Springs and Fall River County

There are nine volunteer fire department (VFD) response areas in Fall River County, of which Hot Springs is one. Hot Springs Volunteer VFD has over 30 volunteers, of which approximately 20 are active firefighters providing fire suppression within and surrounding the city (G. Hanson, personal communication, July 29, 2015). The City of Hot Springs provided approximately $85,000 from the general (tax) fund for fire department operations (Hot Springs 2013). The fire station is located on Garden Street, approximately one mile south of the VA Hot Springs campus.

Wildland fire suppression in Fall River County is provided by VFDs, the State of South Dakota, and the U.S. Forest Service. Because local fire departments are staffed by volunteers, the status and response capability to wildland fires may vary. Hot Springs is considered a "community at risk" due to the moderate level of wildland fire susceptibility (BLM 2004) and because of the size of and structures within the wildland-urban interface surrounding the city (Fall River County 2014).

VA BHHCS Fire Department (FD) is a federally funded department that provides fire response services for VA facilities in Hot Springs and Fort Meade. The fire department on the VA Hot Springs campus is staffed 24 hours a day with a total staffing level of 13 firefighters who operate two fire engines and one brush truck. A mutual aid agreement was executed between the VA Hot Springs FD and the Hot Springs VFD in June 1998 to provide firefighting assistance (personnel and apparatus) to one another (VA 1998). Requests for assistance are infrequent. VA Hot Springs FD is rarely called to provide assistance to the Hot Springs VFD; there have been approximately two to three calls over the past couple of years (J. Henderson, email message to M. Peters, June 26, 2015.).

Although there is no written mutual aid agreement with another federal agency for wildland firefighting assistance, the VA Hot Springs FD would provide appropriate assistance to the Forest Service if requested. VA Hot Springs FD and medical center do not provide ambulance transport for emergency medical response, although the urgent care clinic accepts ambulance transport vehicles.

Hot Springs Ambulance Service provides basic and advanced life support service throughout Fall River and Custer Counties using volunteer and paid personnel (emergency medical technicians and paramedics) from Hot Springs and surrounding communities.

3.11.2.2.2 Rapid City and Pennington County

The Rapid City FD is a paid professional department providing fire suppression and prevention and incident response 24 hours a day from seven fire stations located throughout Rapid City. The department has 142 employees, including 119 firefighters (RCFD 2015). The Emergency Medical Service Division of the Rapid City FD is provides basic and advanced life support ambulance service for Rapid City and throughout Pennington County, and frequently responds into neighboring counties as well. Approximately one-third of the firefighters are paramedics with the others certified as emergency medical technicians. The Rapid City FD responded to 15,422 calls during 2014, of which 75 percent were emergency medical or rescue related (RCFD 2015). The Rapid City FD budget for 2015 is approximately $12.9 million dollars, of which approximately 75 percent is general (tax) funds and 25 percent enterprise (non-tax) funds (Rapid City 2015).

Pennington County Volunteer Fire Service consists of over 450 volunteers belonging to 20 individual VFDs throughout the county providing fire suppression and emergency medical response. These VFDs operate under a mutual aid agreement among the VFDs, the Rapid City FD, and Ellsworth Air Force Base's FD.

3.11.2.3 Law Enforcement Services

3.11.2.3.1 Hot Springs and Fall River County

VA BHHCS maintains a police and security unit to provide law enforcement and security services for the safety and well-being of patients, staff, and visitors at VA facilities. VA Hot Springs Police Department (PD) is staffed by 10 police officers and a supervisor with a minimum of two officers patrolling the VA Hot Springs campus 24 hours a day. The police officers provide security patrols of the facilities, parking lots, and living quarters, and respond to reported suspicious or criminal activity, vehicle activity, and personal property losses on the campus. Although the campus is federal property, VA Hot Springs PD has a support agreement with the local, state, and federal law enforcement agencies having jurisdiction over the area for assistance, as needed, with law enforcement situations.

Police protection and law enforcement within the City of Hot Springs is provided by the Hot Springs PD with a staff of 10 people (Hot Springs 2015). The City of Hot Springs provided approximately $577,000 from the general (tax) fund for police department operations (Hot Springs 2013). The area surrounding the city (outside the corporate limits) is served by the Fall River County Sheriff's Office with a staff of 19 people (R. Evans, personal communication, December 12, 2014). Both law enforcement agencies provide assistance to the VA Hot Springs PD in the event of an emergency or if requested in accordance to the terms of the support agreement.

3.11.2.3.2 Rapid City and Pennington County

Rapid City PD provides law enforcement patrol and investigative and forensic services for the city and surrounding suburban areas. Rapid City PD has a staff of 153 employees and operates on a budget of approximately $13.6 million from general (tax) funds (Rapid City 2015). The Pennington County Sheriff's Office is co-located in the same station as the Rapid City PD. The Sheriff's Office has 372 employees and 221 volunteers with an annual budget of approximately $28 million (Pennington County 2014).

The VA CBOC in Rapid City is not a 24-hour operation and therefore does not require 24-hour protection by a VA police and security unit. VA police from the Fort Meade campus monitor alarms and other law enforcement actions at the CBOC, with assistance from the Rapid City PD in accordance with the terms of a written support agreement. Rapid City PD responds to calls or alarms at the CBOC that require an immediate response.

3.11.2.4 Schools

3.11.2.4.1 Hot Springs and Fall River County

There are three public school districts in Fall River County serving pre-kindergarten through grade 12: Hot Springs, Edgemont, and Oelrichs. Hot Springs School District covers part of Custer County. There is one private elementary school in Hot Springs serving pre-kindergarten through grade 5. School enrollment and expenditure by student for the past five school years are shown in Table 3.11-1.

Table 3.11-1. Enrollment and Expenditure per Student, Fall River County School Districts.

School District	School Year Ending					Change 2010–2014
	2014	2013	2012	2011	2010	
***Enrollment*[1]**						
Hot Springs	802	798	813	810	840	-1.1%
Edgemont	163	170	169	153	150	+2.3%
Oelrichs	123	115	125	123	126	-0.5%
***Expenditure per Student*[1]**						
Hot Springs	$7,559	$8,599	$7,291	$7,891	$6,186	+6.5%
Edgemont	$11,312	$11,592	$11,600	$11,680	$9,542	+4.8%
Oelrichs	$16,019	$17,821	$15,264	$18,082	$14,419	+4.1%

[1] Kindergarten through grade 12.
Source: SDDOE 2015a.

Student enrollment has decreased slightly in Hot Springs and Oelrichs and has increased in Edgemont, while expenditure per student has increased at the three school districts. Expenditures per student for the 2014 school year for Hot Springs, Edgemont, and Oelrichs ranked 115, 24, and 4, respectively, out of the 151 districts in the state (SDDOE 2015b).

Student-to-staff ratios vary by school and from one school year to another. The State of South Dakota Department of Education creates a model district profile based on enrollments and averages for the model district profile. Table 3.11-2 shows the student-to-staff ratio at the Fall River County school districts for the past five school years compared to the state model district average. Hot Springs School District historically operates at a student-to-staff ratio comparable to other school

districts throughout the state with similar student enrollment, whereas Edgemont and Oelrichs historically have had better ratios compared to similarly situated school districts.

Table 3.11-2. Student-to-Staff Ratio, Fall River County School Districts.

School District	School Year Ending					State Average[1]
	2014	2013	2012	2011	2010	
Hot Springs	13.7	13.3	14.6	13.1	14.2	14.1
Edgemont	8.8	9.2	9.5	9.3	10.3	11.3
Oelrichs	8.7	7.5	8.8	6.9	6.5	11.3

[1] School year ending 2014.
Source: SDDOE 2015a.

School district revenue is from local, county, state, and federal sources. The majority of revenue is from local and state sources, with the local sources predominantly from property and sales taxes. There are over 60 other sources of school revenue, such as utility taxes, bank franchise taxes, fines, investment income, and payments in lieu of taxes. A school district's revenue is augmented based on enrollment; number of English proficiency, special needs, and free/reduced lunch eligible students; and if the district is in a sparsely populated area. Table 3.11-3 shows the revenue and expenditure for the Fall River County school districts for the past five school years. Hot Springs and Oelrichs have experienced slight decreases in both revenue and expenditure, whereas Edgemont has experienced increases.

Table 3.11-3. Revenue and Expenditure, Fall River County School Districts.

School District	School Year Ending					Change 2010–2014
	2014	2013	2012	2011	2010	
Revenue[1]						
Hot Springs	$7,216,608	$7,132,873	$7,195,607	$7,477,682	$7,248,351	-0.1%
Edgemont	$2,243,334	$2,277,875	$2,143,916	$2,179,328	$2,047,434	+2.4%
Oelrichs	$1,551,557	$1,654,053	$1,585,342	$1,661,987	$1,574,098	-0.2%
Expenditure[1]						
Hot Springs	$7,056,672	$7,692,006	$6,851,147	$7,827,951	$7,410,216	-0.7%
Edgemont	$2,849,552	$2,209,797	$2,046,652	$2,066,355	$1,893,636	+11.3%
Oelrichs	$2,059,353	$1,972,087	$2,055,241	$2,129,296	$2,087,621	-0.3%

[1] Includes general, capital outlay, special education, and pension funds from local, county, state, and federal sources.
Source: SDDOE 2015a.

3.11.2.4.2 Rapid City

There are six public school districts located entirely or partially in Pennington County: Rapid City, Douglas, New Underwood, Wall, Hill City, and Custer. For purposes of this EIS, only the Rapid City School District is described.

School enrollment and expenditure by student for the past five school years for the Rapid City School District are shown in Table 3.11-4. Enrollment has increased slightly while expenditure per student has increased more. Expenditure per student for the 2014 school year for Rapid City ranked 111 out of the 151 districts in the state (SDDOE 2015b).

Table 3.11-4. Enrollment and Expenditure per Student, Rapid City School District.

School District	School Year Ending					Change 2010–2014
	2014	2013	2012	2011	2010	
Enrollment[1]						
Rapid City	13,702	13,898	13,506	13,280	13,126	+1.1%
Expenditure per Student[1]						
Rapid City	$7,611	$7,188	$7,302	$7,565	$5,778	+7.9%

[1] Kindergarten through grade 12.
Source: SDDOE 2015a.

Table 3.11-5 shows the student-to-staff ratio at the Rapid City public schools for the past five school years compared to the state model district average. Rapid City School District historically operates at a student-to-staff ratio comparable to other school districts throughout the state with similar student enrollment.

Table 3.11-5. Student-to-Staff Ratio, Rapid City School District.

School District	School Year Ending					State Average[1]
	2014	2013	2012	2011	2010	
Rapid City	15.4	16.1	15.6	15.2	16.2	15.5

1 School year ending 2014.
Source: SDDOE 2015a.

Table 3.11-6 shows the revenue and expenditure for the Rapid City School District for the past five school years. Rapid City has experienced minor increases in both revenue and expenditure.

Table 3.11-6. Revenue and Expenditures, Rapid City School District.

School District	School Year Ending					Change 2010–2014
	2014	2013	2012	2011	2010	
Revenue[1]						
Rapid City	$118,372,970	$120,052,644	$119,888,704	$121,909,594	$117,489,528	+0.8%
Expenditure[1]						
Rapid City	$121,742,480	$134,674,624	$154,233,665	$136,078,716	$110,443,034	+3.6%

[1] Includes general, capital outlay, special education, and pension funds from local, county, state, and federal sources.
Source: SDDOE 2015a.

3.11.2.5 Parks and Recreation

Recreational resources near the VA Hot Springs campus include local, state, and national parks. The City of Hot Springs maintains a number of public parks and amenities for various recreational and community events, including golfing, playgrounds, trails, sports, picnicking, swimming, organized events, and relaxing. City parks include Upper Chautauqua, Lower Chautauqua, Brookside, Butler, Centennial, and Cold Brook. Cold Brook Lake and Angostura Reservoir provide fishing, boating, and camping options. Evans Plunge, fed by the natural hot springs, is an enclosed pool offering year-round swimming, hot tubs, and a steam room. Fall River is a major recreational asset through the center of the city with the Freedom Trail system and parks along the river.

Custer State Park is approximately 20 miles north of Hot Springs. Encompassing 71,000 acres within the Black Hills, the park is known for its granite peaks and buffalo herds, and provides wildlife viewing areas, scenic drives, fishing, educational programs, trails, and resort services.

Wind Cave National Park is approximately six miles north of Hot Springs. Encompassing approximately 33,000 acres, the park offers trails, camping opportunities, and tours through one of the longest caves in the world.

The Rapid City Parks and Recreation Department maintains parks, open space, bicycling and walking trails, recreation facilities, and golf courses throughout the community. Rapid City has approximately 22 acres of parks, open space, and public grounds per 1,000 people, which exceeds the national standard of 10 acres (Rapid City 2014). The department manages approximately 1,650 acres of parkland, with some of the more notable being Dinosaur Park (a historic site), Skyline Wilderness Area, Memorial Park, and Storybook Island.

3.12 Solid Waste and Hazardous Materials

Hazardous material is defined (49 CFR 171.8) as a substance or material that has been determined to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce. The term includes "hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, materials designated as hazardous in the Hazardous Materials Table (49 CFR 172.101), and materials that meet the defining criteria for hazard classes and divisions" in 49 CFR Part 173. Transportation of hazardous materials is regulated by the U.S. Department of Transportation (49 CFR Parts 105–180).

Hazardous materials can also be defined as any substance with special characteristics that poses a health or safety hazard to people, plants, or animals when released. Specific types of solid and hazardous materials identified and evaluated in this EIS include:

- Solid (municipal) waste – Solid material discarded by a community, including excess food, containers and packaging, residential garden wastes, other household discards, and light industrial debris (Lindeburg 2001).
- Asbestos-containing materials – Used in many building materials prior to 1989, including floor tiles, textured ceilings, heating pipe insulation, and structural fire protection insulation.
- Lead-based paint – Used in building paints prior to 1978.
- Polychlorinated biphenyls (PCBs) – Includes dielectric fluids, heat-transfer fluids, and hydraulic fluids. Although no longer manufactured in the U.S., PCBs remain in products still in use and in contaminated media from spills and previously contacted surfaces.
- Hazardous waste – Specific wastes regulated by the *Resource Conservation and Recovery Act* (RCRA), including characteristic wastes (wastes exhibiting ignitable, corrosive, reactive, or toxic properties) and listed wastes (specifically identified process and chemical wastes).
- Regulated medical waste – Includes disposable equipment, instruments, utensils, human tissue, laboratory waste, blood specimens, or other substances that could carry pathogenic organisms.
- Hazardous materials stored in aboveground storage tanks (ASTs) and underground storage tanks (USTs).

3.12.1 Regulatory Framework

3.12.1.1 Federal Requirements

The *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) (commonly known as Superfund), enacted in 1980, provides a federal mechanism for cleaning up uncontrolled or abandoned hazardous waste sites as well as accidents, spills, and other emergency releases of pollutants. CERCLA imposes a tax on hazardous substances to create a fund (Superfund) so that EPA can clean up abandoned sites when potentially responsible parties cannot be identified or located, or when potentially responsible parties fail to act (IHMM 2002). Releases of hazardous

substances to the environment in excess of reportable quantities are required to be reported to the National Response Center.

In 1986, the *Superfund Amendments and Reauthorization Act* (SARA) reauthorized CERCLA to continue cleanup activities around the country (IHMM 2002). Title III of this reauthorization act expanded chemical reporting requirements and is also known as the *Emergency Planning and Community Right-to-Know Act*. Title III also required each state to appoint a state emergency response commission, which in turn divided states into emergency planning districts managed by a local emergency planning committee. Chemical use reports are made available to the public to aid in emergency planning and community awareness.

The *Toxic Substances Control Act* of 1976 provides a means to test, regulate, and screen all chemicals produced in or imported into the U.S. The Act has special provisions for the regulation of PCBs, asbestos, radon, lead-based paint, and dioxins (IHMM 2002).

Enacted in 1976, RCRA gave EPA the authority to regulate hazardous waste from "cradle-to-grave," which includes the generation, transport, treatment, storage, and disposal of hazardous waste (IHMM 2002). RCRA also provides a framework for managing nonhazardous solid wastes. The law set forth an intent to promote conservation of resources through reduced reliance on landfilling (ACHMM 2000). In South Dakota, RCRA is administered by the SDDENR.

The 1984 amendments to RCRA, known as the *Hazardous and Solid Waste Amendments*, required that land disposal of hazardous waste be phased out (IHMM 2002). The amendments also increased EPA's enforcement authority, provided more stringent hazardous waste management standards, and created a comprehensive UST program.

Through the 1975 *Hazardous Materials Transportation Act* and its regulations in 49 CFR, the U.S. Department of Transportation has authority over the safe transportation of hazardous materials. The regulation covers hazardous materials classification, hazard communication, packaging requirements, operational rules, and training (IHMM 2002).

Under the *Pollution Prevention Act* of 1990, preventing or reducing waste generation where it originates was made the national environmental policy of the U.S. The Act's purpose was to focus attention on reducing pollution through changes in production, operation, and hazardous material selection.

The *Atomic Energy Act* of 1954 governs the use, possession, and disposal of source, special nuclear, and byproduct materials for civilian and military uses (IHMM 2002). Medical facilities that may use nuclear materials for medical imaging or research purposes are subject to the regulations of the Act.

3.12.1.2 South Dakota Requirements

South Dakota Codified Laws define infectious and medical wastes and govern the unlawful release of infectious wastes to the environment (SDCL 34A-6). Facilities that generate infectious and medical wastes are subject to these laws. SDDENR also regulates the management of solid wastes (as defined in SDCL 34A-6-1.3(17), including municipal garbage, tires, yard waste, construction and demolition debris, contaminated soil, and sludge), hazardous wastes (as defined in SDCL 34A-11-2(4), as they apply to apply to generators and transporters of hazardous waste, used oil, and universal waste), and asbestos abatement (as described in SDCL 34-44, including the removal, storage, and handling of asbestos containing construction, renovation, and demolition debris).

3.12.1.3 Department of Veterans Affairs Guidance

Several VA directives and handbooks provide guidance for the management of solid and hazardous materials and waste, including:

- VA Directive 0057, VA Environmental Management Program (January 15, 2010) – establishes environmental policies within VA.
- VA Directive 0059 and VA Handbook 0059, VA Chemicals Management and Pollution Prevention (May 25, 2012) – prescribes the goals, policies, roles and responsibilities, and major requirements for chemicals management within VA, including reducing or eliminating the quantity of hazardous chemicals and materials acquired, generated, used, or disposed to the extent possible. The guidance also requires development of a chemical management and pollution prevention plan.
- VA Directive 0062 and VA Handbook 0062, Environmental Compliance Management (January 10, 2012) – prescribes the goals, policies, roles and responsibilities, and major requirements for environmental compliance management and reporting within VA, including continual improvement of environmental compliance and optimization through robust environmental management systems.
- VA Directive 0063 and VA Handbook 0063, Waste Prevention and Recycling Program (October 17, 2011) – establishes waste prevention and recycling program policy within VA, promoting source reduction as the most important approach for meeting waste prevention and recycling goals.

3.12.2 Current Conditions

3.12.2.1 Solid Waste

Solid waste is routinely generated through operations at the Hot Springs VAMC. In FY 2013, the Hot Springs VAMC generated 274,530 pounds (137.3 tons) of solid waste (VA 2014a). Corrugated cardboard is compacted onsite; solid waste is collected and transferred by a third party and disposed at the Custer Fall River Regional Landfill (see Figure 3.12-1). The Custer Fall River Regional Landfill (currently managed by Barker Concrete & Construction, Inc.) is a Type IIB municipal landfill that covers 280 acres and is permitted to receive up to 25,000 tons per year of solid waste (SDDENR 2014a), including authorization to receive construction and demolition waste. The landfill accepted approximately 18,000 tons of solid waste in 2013, and ample landfill capacity remains as two additional cells will be constructed in the coming months and a subsequent phase of expansion is planned (Barker 2014).

Solid waste is also routinely generated through operations at the Rapid City CBOC. The Rapid City CBOC is located in a leased facility, and thus the FY 2013 solid waste generation amount is unknown. The solid waste is collected and transferred by a third party and disposed at the Rapid City Landfill (see Figure 3.12-2). The Rapid City Landfill covers 451 acres and is permitted to receive up to 200,000 tons per year of solid waste (SDDENR 2014b), including authorization to receive construction and demolition waste. The landfill accepted approximately 17,000 tons of solid waste from over 18,000 accounts in 2011 (Rapid City 2011). The Rapid City CBOC operations are an insignificant contributor to the overall solid waste intake at the Rapid City Landfill.

Figure 3.12-1. Hot Springs Area Solid Waste Landfills.

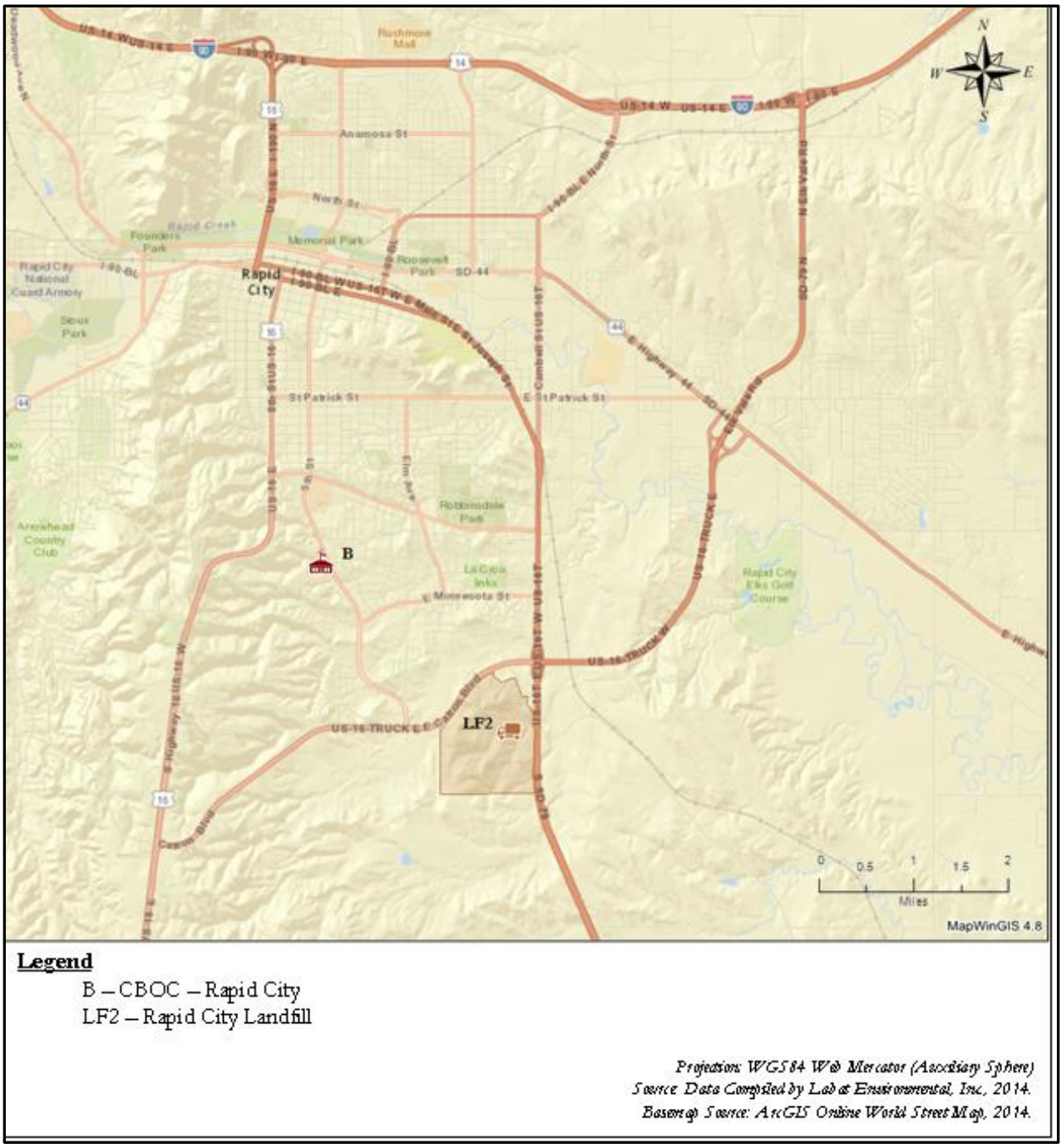


Figure 3.12-2. Rapid City Area Solid Waste Landfills.

3.12.2.2 Medical Waste

Medical waste is routinely generated through operations at both the Hot Springs VAMC and the Rapid City CBOC. Medical waste is collected by a third party and transferred to Stericycle in Dacono, CO, where wastes are treated for ultimate disposal. In FY 2013, the Hot Springs VAMC generated 12,754 pounds of medical waste and the Rapid City CBOC generated 806 pounds of medical waste (VA 2014a).

3.12.2.3 Hazardous Waste

The Hot Springs VAMC is classified as a RCRA Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste (EPA 2014a). CESQGs generate 100 kilograms (220 pounds) per month) or less of hazardous waste or 1 kilogram (2.2 pounds) per month or less of acutely hazardous waste. Additionally, CESQGs may not accumulate more than 1,000 kilograms (2,200 pounds) of hazardous waste at any time. During FY 2014, the Hot Springs VAMC generated 603 pounds of hazardous waste, including 4 pounds of acutely hazardous waste (VA 2014b). All generated hazardous waste is contracted for transportation and disposal at authorized facilities.

Hazardous waste generated at the Rapid City CBOC is managed through the Fort Meade VAMC (a small quantity generator of hazardous waste) (EPA 2014b). Rapid City CBOC operations contribute a small fraction of the hazardous waste generated and managed by the Fort Meade VAMC.

3.12.2.4 Hazardous Materials

Hazardous materials stored and used in VA BHHCS operations (including operations at the Hot Springs VAMC and the Rapid City CBOC) are tracked using a chemical inventory tracking system developed by the VA Center for Engineering and Occupational Safety and Health. Management of hazardous materials within VA is outlined in VA Directive 0059, *VA Chemicals Management and Pollution Prevention* (VA 2012).

The Hot Springs VAMC stores some hazardous materials in ASTs; no USTs are present at the site. Three ASTs (39,590 gallons each) store #2 diesel fuel oil for site heating purposes. Twelve additional ASTs (ranging from 40 gallons to 2,000 gallons) store #1 and #2 diesel fuel, gasoline, hydraulic oil, cylinder oil, and compressor oil. ASTs at the site are located within secondary containment and are managed in accordance with the site Spill Prevention, Control, and Countermeasures Plan. Rapid City CBOC operations do not utilize any ASTs or USTs.

Radioactive materials are used in medical operations within the VA BHHCS. The BHHCS radioactive material management program effectively tracks and manages radioactive sources while onsite, where they naturally decay and are eventually disposed in accordance with solid waste regulations.

3.12.2.5 Building Materials

Many uses of asbestos-containing materials were phased out or banned in a series of federal regulations from 1973 to 1990. Lead-based paint was used in many structures built or repainted before 1978. Due to the age of the facilities at the Hot Springs VAMC, asbestos-containing materials and lead-based paint are present in facility building materials. The VA BHHCS Industrial Hygiene group maintains an inventory of facilities where asbestos-containing materials and lead-based paint

are present. These materials are not known or expected to be present at the Rapid City CBOC, as the facility was constructed in 1995.

No PCB-containing equipment is known to be located at either the Hot Springs VAMC or the Rapid City CBOC.

3.13 Transportation and Traffic

Transportation and traffic are defined by the physical attributes and functionality of the roadway network within the VA BHHCS service area, along with the available modes of travel that are available within the service area. A segment of a roadway network is commonly referred to as a transportation facility.

3.13.1 Regulatory and Policy Framework

3.13.1.1 South Dakota

The Statewide Long Range Transportation Plan prepared by the South Dakota Department of Transportation provides an overview of the transportation network and trends in the state, and outlines actions to address these trends and develop solutions to transportation problems (SDDOT 2010). The plan guides annual decision-making for the Statewide Transportation Improvement Program, which is a five-year list of transportation projects scheduled for completion. State and federal funding for transportation improvement projects is based on these two plans.

3.13.1.2 Pennington County and Rapid City Area

The transportation goal established by the Pennington County Comprehensive Plan is to achieve a safe, efficient, and convenient transportation network that is coordinated with existing land use and future planned growth throughout the county (Pennington County 2003). Pennington County coordinates with municipal governments in the development of the regional transportation system and facility improvements.

Transportation planning in the Rapid City area is conducted by the Rapid City Area Metropolitan Planning Organization (MPO). The MPO includes the cities of Rapid City, Box Elder, Summerset, and Piedmont; Ellsworth Air Force Base; unincorporated areas of Black Hawk; and developing areas of Pennington and Meade Counties. The long range transportation plan for the Rapid City area is called *RapidTRIP 2035* (MPO 2010). The MPO is in the process of updating the plan to 2040. The plan identifies specific services and projects for different modes of travel that will be necessary to meet the transportation needs of the Rapid City area through 2040, once updated. The different modes of travel addressed in the plan include auto, transit, non-motorized (bicycle and pedestrian), and, to a lesser extent aviation, rail, and freight.

The MPO prepared the *2013-2017 Coordinated Public Transit-Human Services Transportation Plan* (MPO 2013) to identify strategies to improve transportation and access to services, health care, and employment for seniors, persons with disabilities, and individuals with low incomes. Some of the strategies to improve transportation services include expanding the transit service times, days, and destinations; adding *Americans with Disabilities Act* accessible bus stops; sharing resources among agencies; and increasing outreach to transit users.

The MPO prepared the *Rapid City Area Bicycle and Pedestrian Master Plan* (MPO 2011) to guide the development of a network of bicycle and pedestrian routes that link activity centers within Rapid City and provide opportunities for connections to surrounding areas. The plan calls for including appropriate bicycle and pedestrian access in design criteria for roadway construction projects.

The Rapid City Comprehensive Plan (Rapid City 2014) goals and policies pertaining to transportation include synchronizing the transportation network with land use needs, and expanding public transit service by enhancing bus stops, improving safety and functionality for elderly or disabled residents, and expanding transit service hours and connectivity between key community destinations.

3.13.1.3 Fall River County and Hot Springs Area

Fall River County does not have a transportation plan.

The Hot Springs Comprehensive Plan (Hot Springs n.d.) goals specific to transportation include:

- Provide for adequate road capacity to serve both current and future needs as new development occurs.
- Evaluate street improvement standards to encourage designs that will serve to reduce adverse effects on adjacent and abutting land uses.
- Improve signage along the main traffic corridors, indicating distance and direction to shopping and parking areas and areas of special interest.
- Improve north-south traffic flow along North River Street (through the lower town area).
- Provide financial resources for improvements and adequate maintenance of existing roads.
- Establish a street grade ordinance for new streets to avoid future problems.
- Institute a program to ensure that all main collector streets be resurfaced with durable all-weather hard-surfaced finish through the use of assessment districts or a bond issue.
- Require private developers to install curb and gutter and sidewalks during new development in major renovation areas.
- Monitor high accident intersections in Hot Springs and develop effective measures to reduce accidents in these areas.

3.13.2 Current Conditions

Roadways are classified by function based on the type of service the road provides for the traveling public. Road functions fall generally within four broad classifications, which are further defined by transportation planning agencies to reflect local conditions, such as in rural or urban areas. The road functional classifications in the VA BHHCS service area include:

- Principal (major) arterials: Divided, limited access facilities that serve higher traffic volumes and longer distance trips, connect major traffic generators, and are primarily interstates, freeways, or expressways. In rural areas, principal arterials also include two-lane, undivided highways with no access controls, and are primarily U.S. highways or major state highways.
- Minor arterials: Collect and distribute traffic from principal arterials to lower classified streets in urban areas, or link rural communities.
- Collectors: Provide traffic circulation and land access between urban residential and commercial areas, or serve intra-county travel in rural areas.

- Local roads: Provide lowest level of mobility and highest level of access to adjacent land; traffic speed is relatively slow.

3.13.2.1 VA BHHCS Service Area

The principal arterials crossing east-west through the VA BHHCS service area include Interstate 90 (I-90), U.S. Highway 18 (US-18), US-20, and US-26. The principal arterials crossing north-south through the service area include US-385, US-85, and South Dakota Highway 79 (SD-79). Examples of minor arterials in the rural area include SD-36, SD-44, SD-73, Nebraska Highway 2 (NE-2), and NE-27; and examples of collectors include SD-71 and SD-471. The major roadways in the VA BHHCS region are shown in Figure 3.13-1.

Average daily traffic (ADT) counts range between approximately 5,100 and 7,300 vehicles on the rural stretches of I-90 through the VA BHHCS service area, and approximately 3,400 and 9,000 vehicles on SD-79 between Hot Springs and Rapid City (SDDOT 2014). The ADT counts on the rural stretches of other principal arterials and minor arterials range between approximately 1,500 and 3,600 vehicles, with less than 1,000 vehicles on the collector roads (SDDOT 2014; NDOR 2014; WYDOT 2013). These counts increase near and through the rural communities.

Rural public transit services are available throughout the VA BHHCS service area that are 80 percent funded by the Federal Transit Administration and operated by local governments, transportation service providers, non-profit organizations, or Indian tribes. These services are generally operated on a 24-hour advance request and some provide regularly scheduled trips to the larger communities. Fares vary based on originating location and trip destination. Some of the rural public transit providers offer free or reduced fare services for Veterans and senior citizens. The VetTrans program offered by rural transit services assists Veterans, Veterans' families, and Veteran service organizations with their transportation needs for medical appointments, employment, and daily activities.

Commercial bus transportation in the VA BHHCS service area is limited to interstate routes. Commercial air transportation is available in Pierre, Rapid City, and Scottsbluff. Commercial taxi or private shuttle services are available in most communities within the service area.

The Disabled American Veterans (DAV) organization provides transportation for Veterans to VA medical facilities. The DAV has volunteer shuttle coordinators and drivers for Rapid City, Fort Meade, and other communities in the VA BHHCS service area to arrange transportation services to local CBOCs and to the medical facilities in Hot Springs and Fort Meade. The DAV estimates that they provide 200 to 250 rides per month throughout the VA BHHCS service area (Personal communication, Don Sealock, DAV Hospital Service Coordinator for BHHCS, with A. Woodruff, 7/15/15). Transportation services are funded by donation and federal grants and are free for injured or ill Veterans.

Figure 3.13-1. Major Roadways in VA BHHCS Service Area.

3.13.2.2 Rapid City Area

The principal arterials through Rapid City include I-90, I-190, US-16 (Mount Rushmore Road), US-16 Bypass (Elk Vale Road), and SD-44 (Jackson Boulevard and Omaha Street). Examples of minor arterials in the urban area of Rapid City include Main Street, St. Patrick Street, 5th Street, and Campbell Street. Examples of collectors include Skyline Drive and Minnesota Street.

The ADT counts on I-90 through the Rapid City area range between approximately 21,000 and 35,000 vehicles (SDDOT 2014). The ADT counts on the other principal arterials range between approximately 8,000 and 23,000 vehicles, with the highest counts between 25,000 and 30,000 vehicles in the downtown area on Omaha Street between East Boulevard and West Boulevard (MPO 2015). The ADT counts vary widely on the minor arterials and collectors based on the locations throughout the city, but generally range between 5,000 and 15,000 vehicles (MPO 2015).

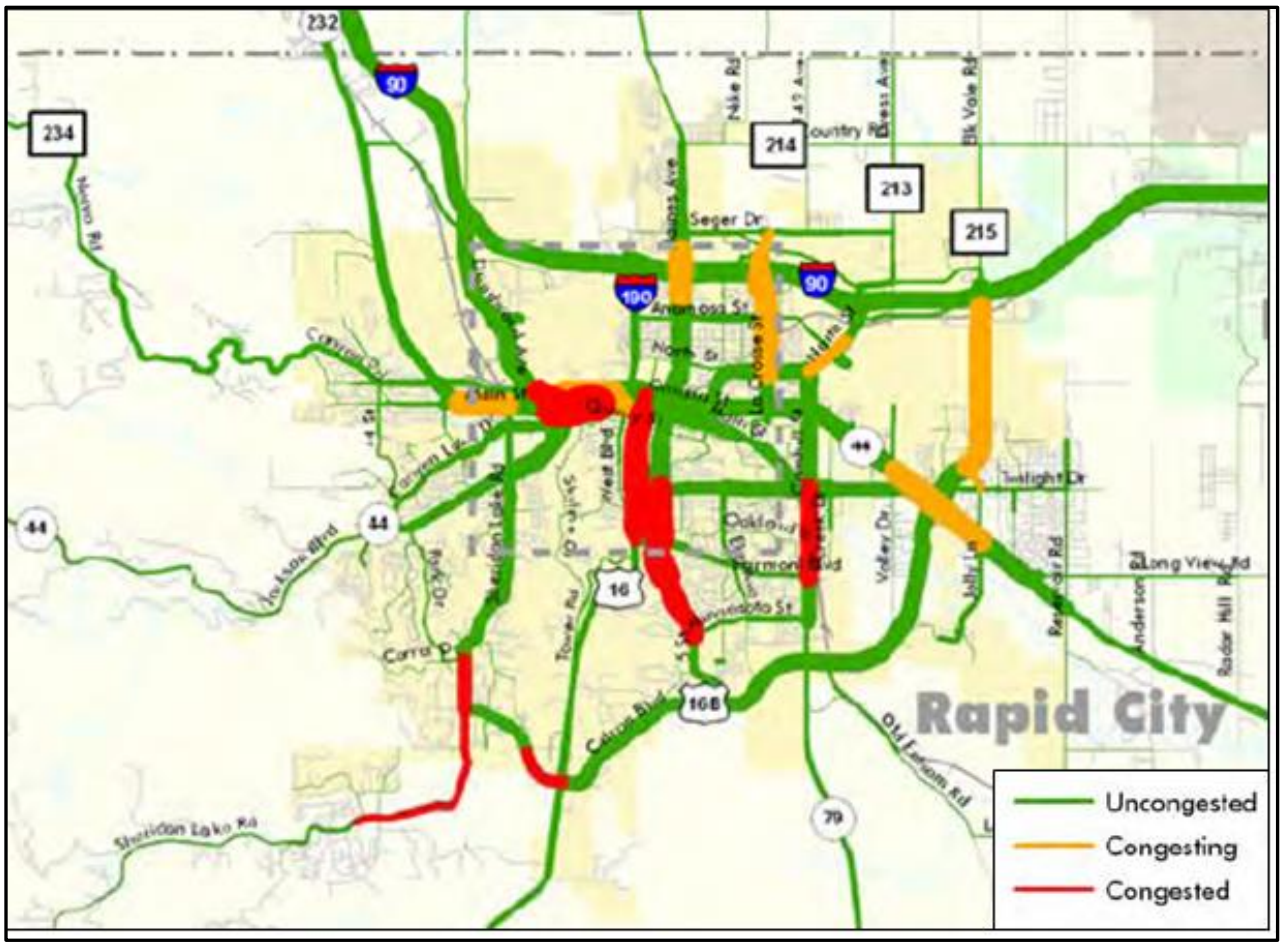
According to the long-range transportation plan, *RapidTRIP 2035,* the existing roadway network handles current traffic demands quite well, with sporadic congestion problems generally occurring at intersections with deficient signalization or where the addition of turn lanes could alleviate the congested condition. The baseline traffic congestion that was used for transportation planning is shown in Figure 3.13-2.

Research and data gathering for the 2015 update of *RapidTRIP 2035* indicated that residents and employers are satisfied overall with the quality of roads and highways in the Rapid City area, including road maintenance and improvements. There was some dissatisfaction with congestion in specific locations, including Sheridan Lake Road, SD-44 from the airport, and in the vicinity of schools (BBC 2014).

Congestion during morning and evening peak hours will increase based on residential growth in the south and southwest areas of Rapid City. The transportation facility improvements through 2015 with projected 2035 traffic increases will likely result in peak hour congestion on north-south principal and minor arterials, as shown in Figure 3.13-3.

Source: MPO 2010.

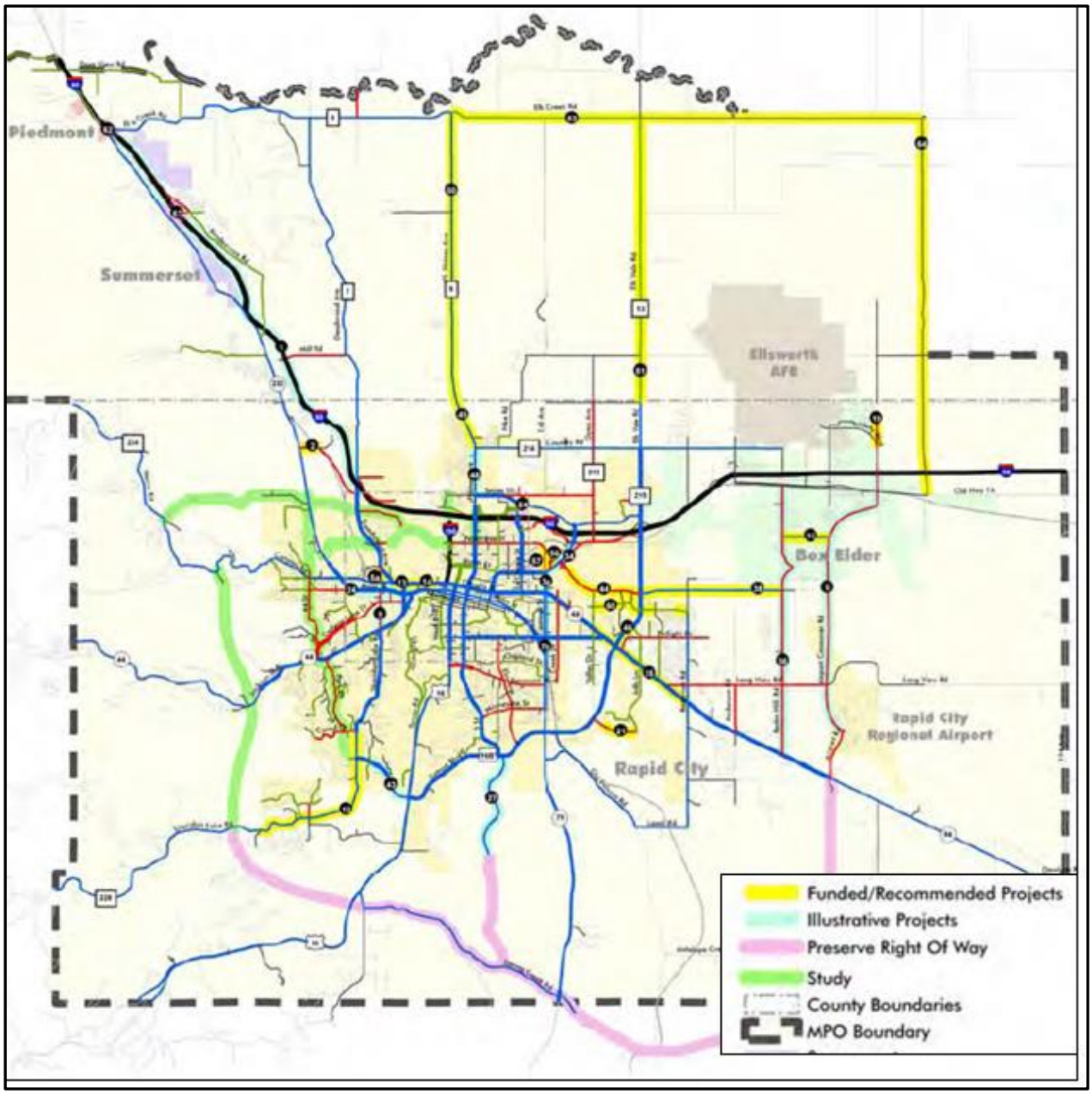
Figure 3.13-2. Traffic Congestion in Rapid City.



Source: MPO 2010.

Figure 3.13-3. Future Congestion with 2015 Transportation Improvements and 2035 Traffic.

The Rapid City Area MPO adopted a future "financially constrained" roadway plan in *RapidTRIP 2035* that identified projects and studies needed to improve transportation capacity. The plan includes recommended (funded) projects, but it is financially constrained because it also includes illustrative (unfunded) projects, studies to determine feasibility of transportation improvement projects, and right-of-way preservation. Figure 3.13-4 shows this future roadway plan. Although this future roadway plan would not address all anticipated congestion with 2035 traffic, it would be expected to improve conditions in the Rapid City area, as shown in Figure 3.13-5.



Source: MPO 2010.

Figure 3.13-4. Future 2035 Financially Constrained Roadway Plan.

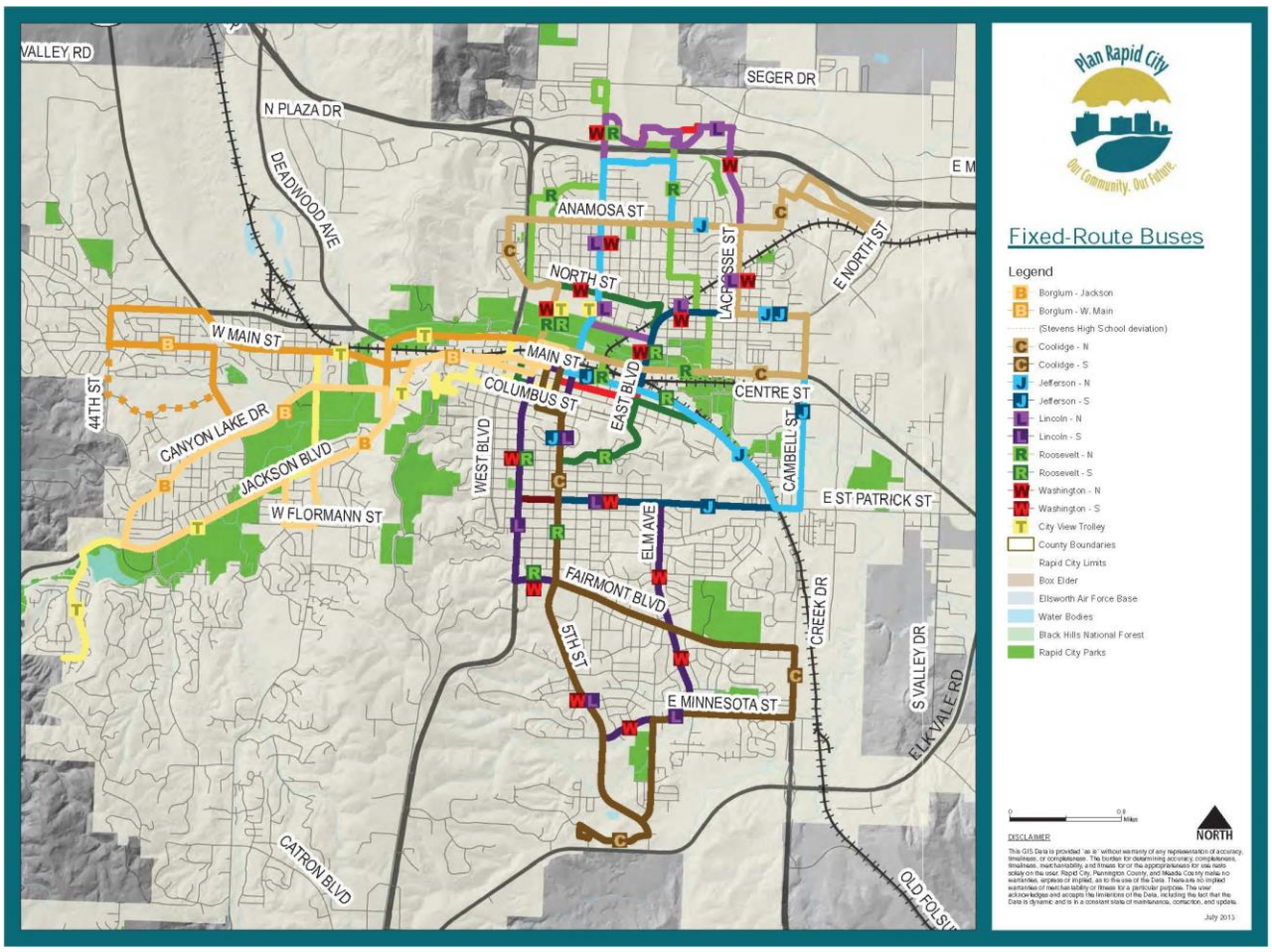
Source: MPO 2010.

Figure 3.13-5. Future Congestion with 2035 Financially Constrained Roadway Plan.

Public transportation options in Rapid City include a fixed bus route system (RapidRide), para-transit service (Dial-A-Ride) for passengers with disabilities, and trolley service (City View Trolley) between popular tourist destinations. These services are operated by Rapid Transit System.

Dial-A-Ride provides curb-to-curb or door-to-door transportation for local residents who qualify for services under the *Americans with Disabilities Act*. The service operates within the corporate limits of Rapid City on Monday through Friday from 6:20 a.m. to 5:50 p.m. and on Saturday from 8:00 a.m. to 7:00 p.m., excluding holidays. Service must be scheduled with Rapid Transit System one day prior to the passenger's planned trip.

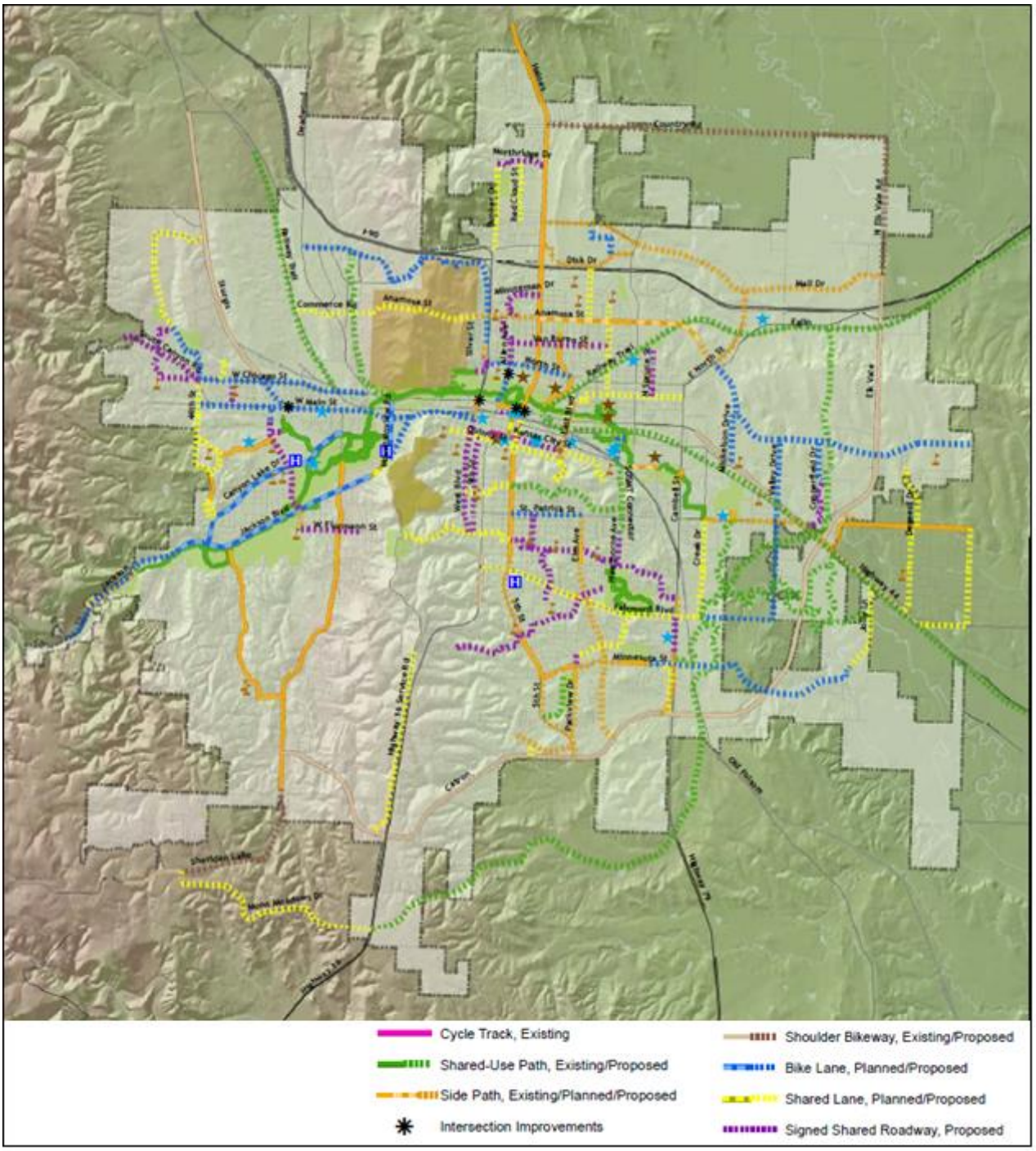
RapidRide operates year-round on six different fixed routes from the Milo Barber Transportation Center located at 333 6th Street, and on two school routes during the school year. The service operates on Monday through Friday from 6:20 a.m. to 5:50 p.m. and on Saturday from 9:50 a.m. to 4:40 p.m., excluding holidays. The route system map is shown in Figure 3.13-6.



Source: Rapid City 2014.

Figure 3.13-6. RapidRide Bus System Route Map.

The *Bicycle and Pedestrian Master Plan* is intended to make bicycling and walking a more viable mode of transportation in the Rapid City area. A network of on-street and off-street bicycle and pedestrian facilities will provide connections to destinations throughout the city, and will integrate with the bus network to increase the distance that can be comfortably traveled by a pedestrian or bicyclist. The locations of existing and proposed bikeways are shown in Figure 3.13-7.



Source: MPO 2011.

Figure 3.13-7. Existing and Proposed Bikeways.

3.13.2.3 Hot Springs Area

The principal arterials through the Hot Springs area include SD-79, US-18/US-385, US-18 Bypass (Indianapolis Avenue)/US-18, US-18 (Chicago Street), and US-385 (River Street). University Avenue (US-18) is a minor arterial, and Galveston Avenue, SD-71, Argyle Road, and a short segment of 6th Street are collector roads. The remaining street network throughout Hot Springs is rural local roads.

The ADT counts on the principal arterials range from approximately 4,900 to 5,700 vehicles on the stretch of US-18/US-385 from SD-79 through Hot Springs (SDDOT 2014). The ADT counts on US-18 between Hot Springs and Edgemont range from 1,940 to 1,785 vehicles, and from 1,600 to 120 vehicles on SD-71 between Hot Springs and Ardmore at the Nebraska state line. The ADT count on US-385 north of Hot Springs is less than 1,400 vehicles.

The main travel route through Hot Springs on Chicago Street and River Street can experience congestion with additional cars, tour buses, and recreational vehicles during the peak tourist season.

Rural public transit services are available in Hot Springs and Fall River County. Prairie Hills Transit, a non-profit organization, provides public transportation within Hot Springs and service to Rapid City, Custer, and Edgemont via disability accessible vehicles. The transportation service is available Monday through Friday from 7:00 a.m. to 4:00 p.m. with a 24-hour advance request.

Bicycle and pedestrian routes in the Hot Springs area include the Freedom Trail that parallels Fall River through the city, and the George S. Mickelson Trail that crosses the western part of Fall River County.

3.14 Utilities

Utilities are defined as services provided to the public, often but not always distributed by community-wide infrastructure. Specific utilities identified and evaluated in this EIS include:

- Water treatment and supply
- Wastewater treatment
- Electricity supply
- Heating supply (natural gas or heating oil)
- Communications (telephone and data)

3.14.1 Regulatory and Policy Framework

Three *Energy Policy Acts* have been passed, which include provisions for conservation and energy development, use of alternative fuels, increased fuel economy requirements, biofuel development, and changes to indoor lighting, with grants and tax incentives for both renewable and non-renewable energy.

On March 19, 2015, the White House issued Executive Order 13693, *Planning for Federal Sustainability in the Next Decade*. This order stated that federal agencies should prioritize reducing energy use and cost, then on finding renewable or alternative energy solutions; propose greenhouse gas emission reduction targets; beginning in FY 2016, where life-cycle cost-effective, implement measures specified in the order related to building energy use, renewable energy sourcing, water use, decreasing fleet inventories and mobile source greenhouse gas emissions, use of recycled and sustainably produced materials; advance waste prevention and pollution prevention; and promote electronics stewardship. Agencies, including VA, were previously required to develop and implement strategic sustainability performance plans (SSPPs) in accordance with Executive Order 13514, which was revoked by Executive Order 13693. VA's existing SSPP identifies sustainability goals and defines strategies for achieving these goals, consistent with VA's Sustainability Management Policy. The SSPP includes goals for sustainable buildings, water use efficiency, greenhouse gas reductions, and renewable energy usage (VA 2014). A draft 2015 SSPP is in review at this time of this publication (Email from B. Carlson, July 23, 2015).

3.14.2 Current Conditions

3.14.2.1 Water Treatment and Supply

Water is supplied to the Hot Springs VAMC from a natural spring located approximately one-half mile northwest of the VAMC campus. Water is diverted from the spring to a cistern located at the VAMC Boiler Plant (Building 18) through a buried eight-inch diameter pipe via gravity. Water is pumped from the cistern via two pumps to two water towers (980,000 gallons total capacity) through buried eight-inch and six-inch diameter pipe. Typically, one pump is operated at a time, but both pumps can be operated if necessary. Water is treated for potable use with gaseous chlorine. Water uses at the VAMC include potable use, heating, fire protection, and landscape irrigation. Water diverted to the cistern in excess of VAMC demand is discharged to Fall River.

South Dakota administers water rights under the Doctrine of Prior Appropriation, where the priority of each water right is established based on the date of filing an application (priority date) –

older rights are senior to more recent rights. VA holds two water rights licenses authorizing its use of the spring water supply. Vested Right Water License No. 2420-2 appropriates 1.56 cubic feet per second (700 gallons per minute) of water from the spring. This water right has a priority date of January 1, 1907 (SD 1999). Water License No. 2421-2 appropriates an additional 1.23 cubic feet per second (551 gallons per minute) of water from the spring. This water right has a priority date of March 17, 1999 (SD 2011).

The Hot Springs VAMC is also connected to the Hot Springs municipal water system for backup supply.

The Hot Springs VAMC reported a total water consumption of 24,284,000 gallons in FY 2013 and 26,103,000 gallons in FY 2014, with greater consumption during the summer months when landscape irrigation is required (VA 2015). Figure 3.14-1 depicts the monthly water consumption for the Hot Springs VAMC.

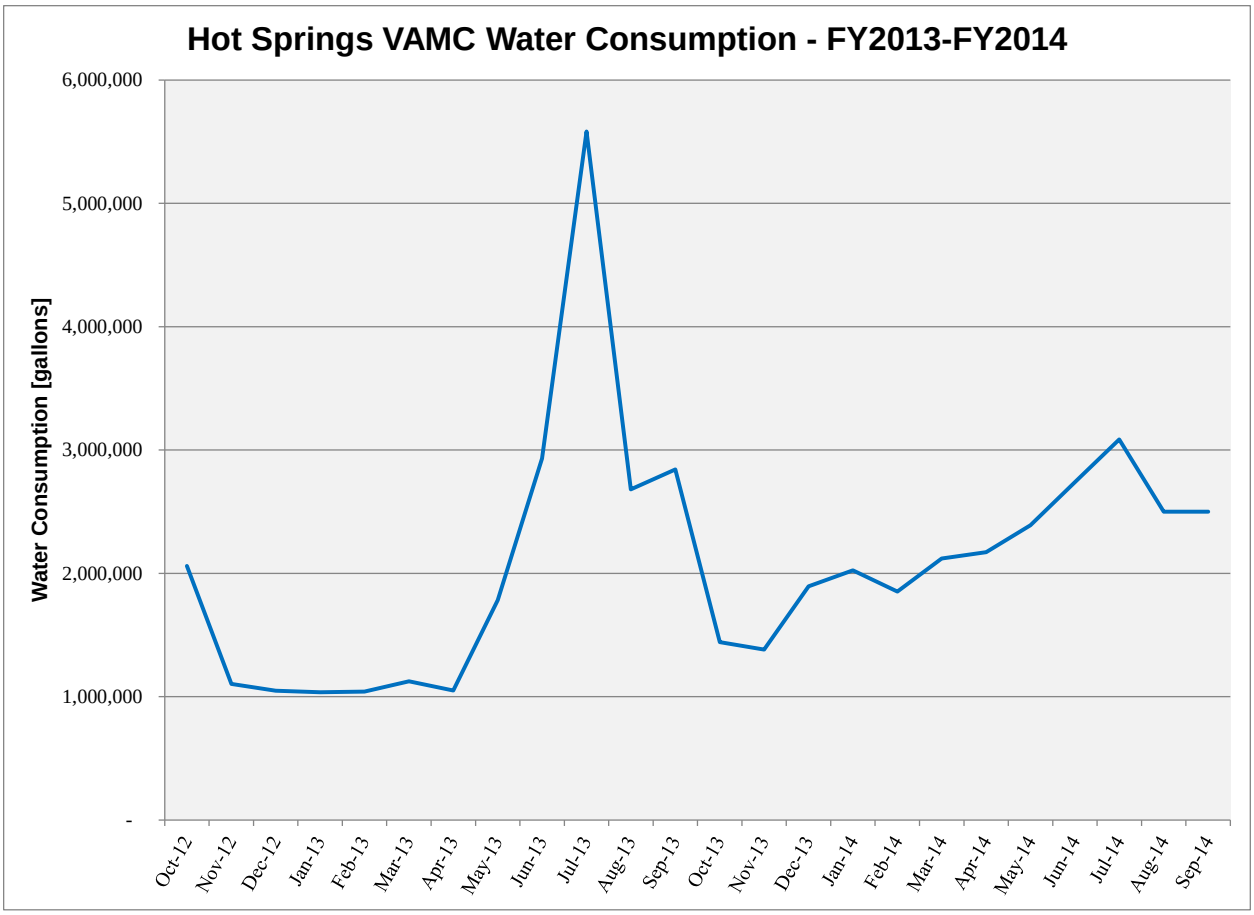


Figure 3.14-1. Hot Springs VAMC Water Consumption, FY 2013 – FY 2014.

The Rapid City CBOC is connected to the Rapid City municipal water system for water supply. Water uses at the CBOC include potable use and fire protection. The CBOC is one tenant located within a leased facility, and water consumption attributable only to CBOC operations is not available.

3.14.2.2 Wastewater Treatment

The Hot Springs Wastewater Treatment Plant treats wastewater generated throughout Hot Springs, including wastewater generated at the Hot Springs VAMC. The treatment facility design flow is 700,000 gallons per day (EPA 2014a), and the average facility flow is 350,000 gallons per day (Bastian 2014). Treated water is discharged to Fall River. The Hot Springs City Engineer noted that concerns have been raised regarding the potential for anaerobic conditions developing in the treatment plant clarifier if average flows are significantly lower than the design flow. However, such conditions have not yet developed at the current average flow, and it is unknown at what average flow such conditions would develop (Bastian 2014).

Wastewater generation from the Hot Springs VAMC is metered at two locations where wastewater is discharged to the city wastewater collection and treatment system. The Hot Springs VAMC reported a total wastewater generation of approximately 13,200,000 gallons in FY 2013 and approximately 10,100,000 gallons in FY 2014 (VA 2015), or approximately nine percent of the Hot Springs Wastewater Treatment Plant average facility flow. Figure 3.14-2 depicts the monthly wastewater generation for the Hot Springs VAMC.

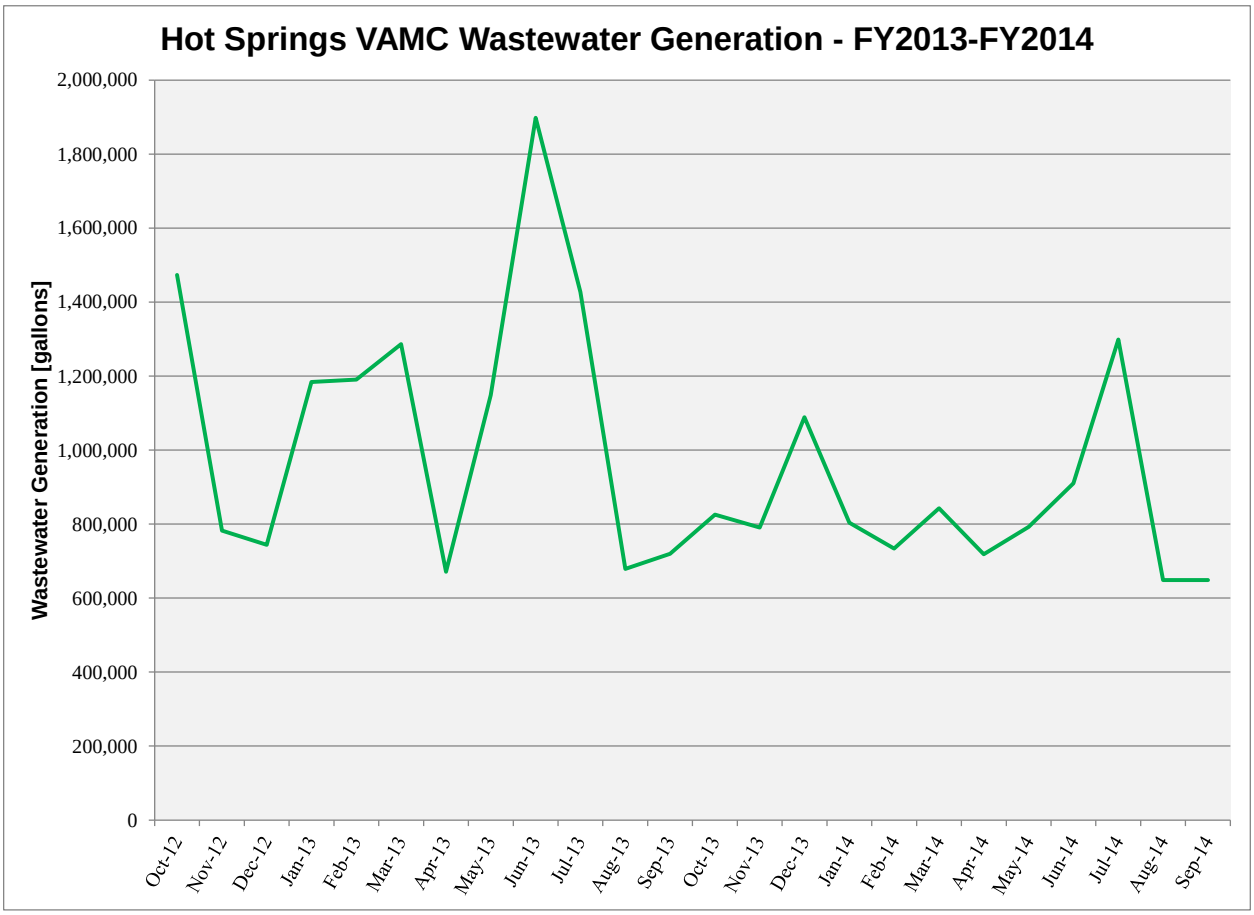


Figure 3.14-2. Hot Springs VAMC Wastewater Generation, FY 2013 – FY 2014.

The Rapid City Wastewater Treatment Plant treats wastewater generated throughout Rapid City, including wastewater generated at the Rapid City CBOC. The treatment facility processed 3.5 billion gallons of wastewater in 2011 (averaging 9.6 million gallons per day from over 20,000 accounts) (Rapid City 2011). Treated water is discharged to Rapid Creek (EPA 2014b). The Rapid City CBOC is one tenant located within a leased facility, and wastewater generation attributable only to CBOC operations is not available. However, the Rapid City CBOC operations are an insignificant contributor to the overall wastewater inflow at the Rapid City Wastewater Treatment Plant.

3.14.2.3 Electricity Supply

Electricity service at both the Hot Springs VAMC and the Rapid City CBOC is provided by Black Hills Power, a subsidiary of Black Hills Corporation. Black Hills Power provides electricity service to nearly 70,000 customers in 20 different communities throughout western South Dakota, northern Wyoming, and southeastern Montana (BHP 2014a). Black Hills Power has full or partial ownership in 11 power generating facilities in the region (BHP 2014b).

The Hot Springs VAMC consumed 6,409,513 kilowatt-hours in FY 2013 and 6,275,920 kilowatt-hours in FY 2014 (VA 2015). The operational square footage of the Hot Springs VAMC is 464,000 square feet, meaning the average annual electricity consumption for the facility was 13.8 kilowatt-hours per square foot. This electricity consumption rate is similar to the electricity consumption rate of 13.2 kilowatt-hours per square foot for all buildings in the Midwest census region (EIA 2003). Figure 3.14-3 depicts the monthly electricity consumption for the Hot Springs VAMC.

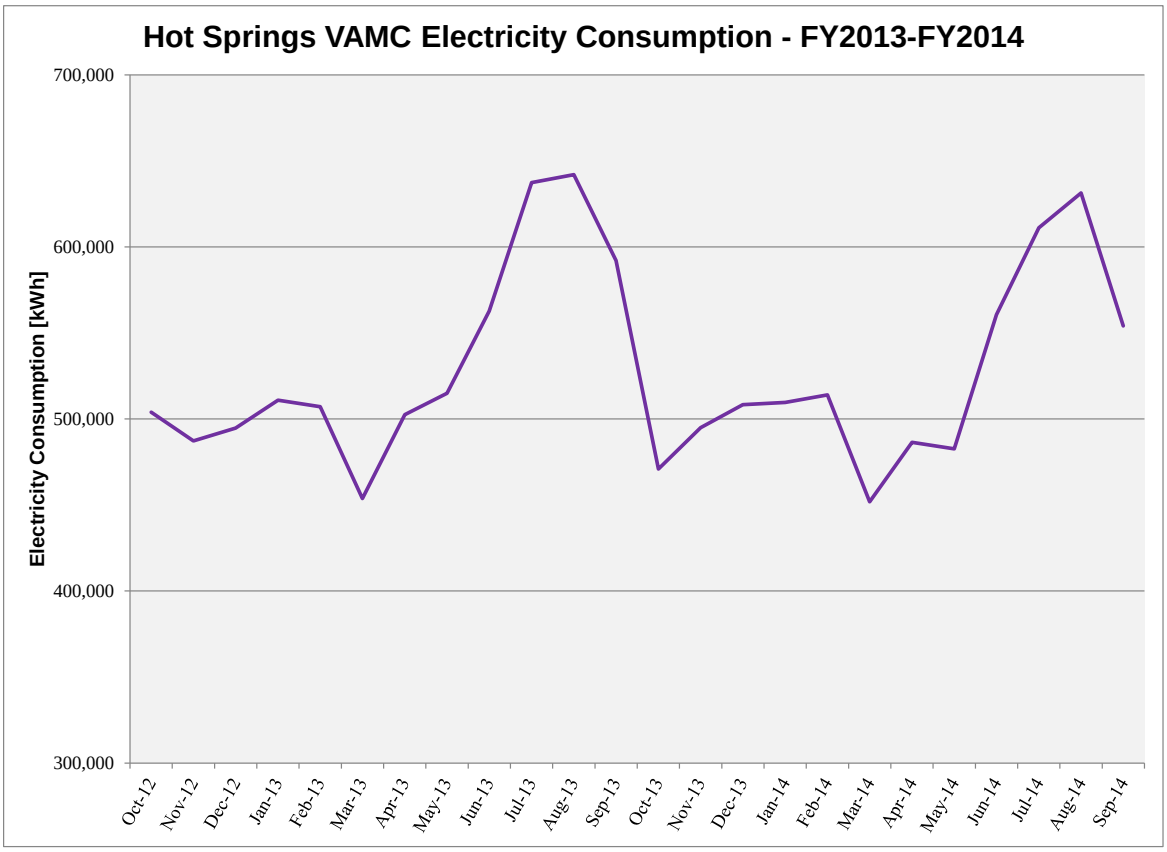


Figure 3.14-3. Hot Springs VAMC Electricity Consumption, FY 2013 – FY 2014.

The Rapid City CBOC is one tenant located within a leased facility, and electricity consumption attributable only to CBOC operations is not available.

3.14.2.4 Heating Supply

The Hot Springs VAMC operates three 500-horsepower steam boilers to provide facility heating. The boilers utilize #2 fuel oil supplied by Harm's Oil in Aberdeen, SD. Fuel oil is stored in three 39,590-gallon ASTs. The Hot Springs VAMC consumed 397,444 gallons of #2 fuel oil for steam generation in FY 2013 and 438,765 gallons in FY 2014 (VA 2015). Figure 3.14-4 depicts the monthly fuel oil consumption for the Hot Springs VAMC. The majority of facilities and residences in Hot Springs use either electricity or propane for heating purposes (City-Data 2014a).

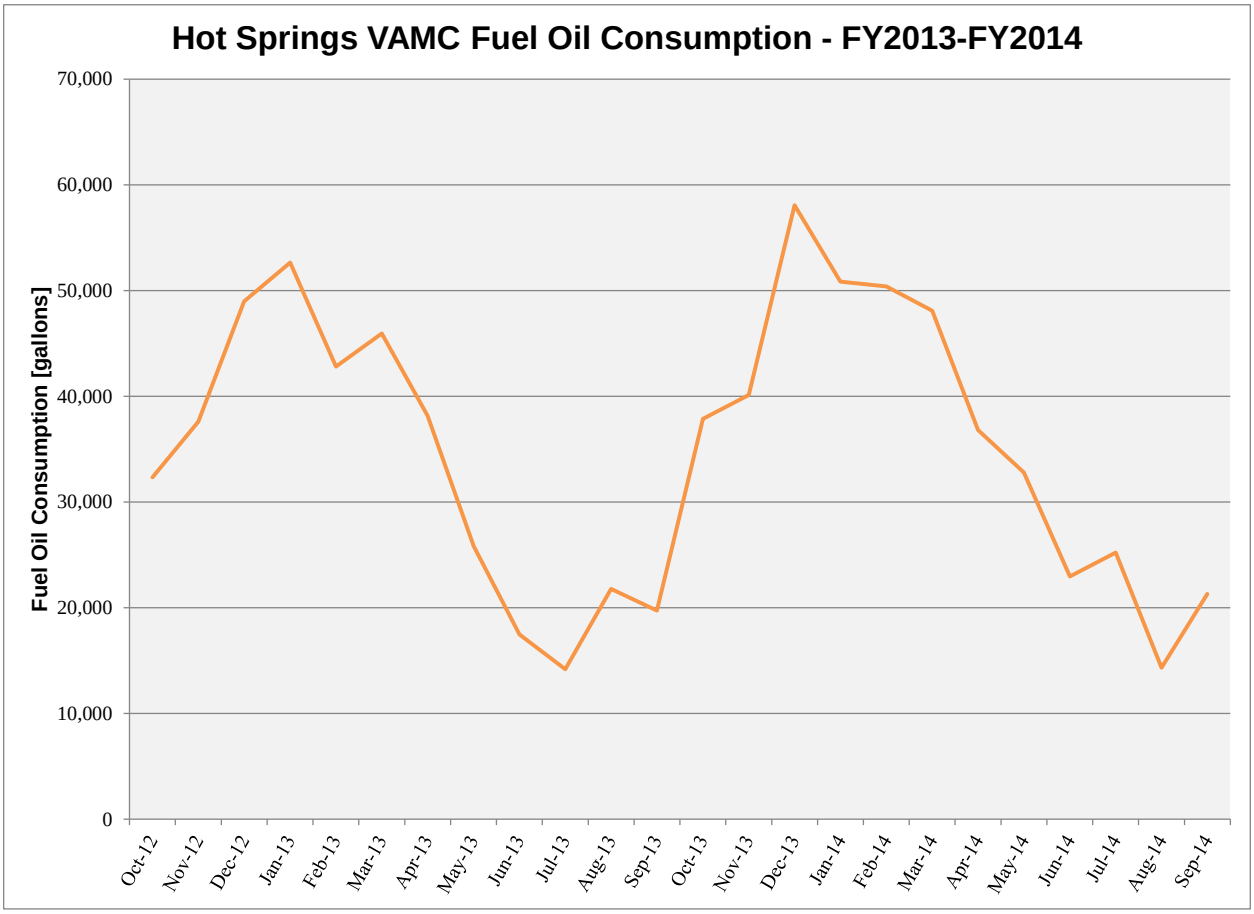


Figure 3.14-4. Hot Springs VAMC Fuel Oil Consumption, FY 2013 – FY 2014.

The Rapid City CBOC is one tenant located within a leased facility, and natural gas consumption for heating purposes attributable only to CBOC operations is not available. The majority of facilities and residences in Rapid City use natural gas for heating purposes (City-Data 2014b), supplied by Montana-Dakota Utilities Company.

3.14.2.5 Communications

The Hot Springs VAMC currently receives telephone, television, and internet service from Golden West Telecommunications. Golden West Telecommunications provides services to much of the southwestern South Dakota area, including Hot Springs. Communications services are available throughout the area.

As the Rapid City area is a larger metropolitan area than the Hot Springs area, a greater number of telephone, television, and internet providers service the area, allowing consumers a choice in service providers. Communications services are available throughout the area.

3.15 Environmental Justice

Environmental justice applies to potential adverse environmental impacts disproportionately borne by minority or low income populations. Environmental justice includes protection from health and safety risks if the potential for such risks are driven by an environmental impact. Related to environmental justice is any disproportionate risk to children, regardless of minority or income status, from environmental health and safety impacts.

3.15.1 Regulatory and Policy Framework

3.15.1.1 Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Executive Order 12898 requires each federal agency identify and address, as appropriate, the disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. These provisions also apply fully to programs involving Native Americans. The executive order is also intended to promote nondiscrimination in federal programs, policies, and activities that affect human health and the environment, and to provide minority and low-income communities with access to public information and public participation.

3.15.1.2 Council on Environmental Quality Guidance

CEQ prepared *Environmental Justice Guidance under the National Environmental Policy Act* (CEQ 1997) for performing environmental justice analyses as part of the NEPA process. The guidance provides definitions, thresholds, and overall methodology for environmental justice analyses, including the following:

- ***Minority.*** Individuals who identify themselves as American Indian or Alaska Native, Hispanic or Latino, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, some other race, or member of two or more races. For purposes of this EIS, the definition has been updated from the population groups listed in CEQ (1997) to include groups currently listed on the U.S. Census form.
- ***Minority population.*** Minority populations should be identified in a NEPA document where either (a) the minority population of an affected area exceeds 50 percent, or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. For purposes of this EIS, "meaningfully greater" is defined as more than 10 percentage points higher than the general population of the geographic unit of the VA BHHCS service area in the states of South Dakota, Nebraska, and Wyoming.
- ***Low-income population.*** Low-income populations in an affected area are identified based on the annual statistical poverty thresholds from the U.S. Census Bureau's Current Population Reports, Series P60, Income and Poverty. For purposes of this EIS, a "low-income population" is defined similarly to a minority population in terms of percentages of persons in the affected area.

3.15.1.3 Executive Order 13045: Protection of Children from Environmental Health Risks and Safety Risks

Under Executive Order 13045, each federal agency must identify and assess environmental health risks and safety risks that may disproportionately affect children, and ensure that its actions address disproportionate risks to children that result from environmental health risk or safety risks.

3.15.1.4 Interagency Environmental Justice Memorandum of Understanding and VA Strategy

In 2011, VA and 16 other federal agencies signed the *Memorandum of Understanding on Environmental Justice and Executive Order 12898* (Holder et al. 2011). Combined, Executive Order 12898 and the Memorandum of Understanding:

- Require each covered and participating agency to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."
- Declare the continued importance of identifying and addressing environmental justice considerations in agency programs, policies, and activities as provided in Executive Order 12898.
- Renew the process for agencies to provide environmental justice strategies and implementation progress reports.
- Establish structures and procedures to ensure that the Environmental Justice Interagency Working Group operates effectively and efficiently.
- Require development or review/update of each agency's environmental justice strategy.
- Require agencies to provide opportunities for the public to submit comments and recommendations relating to the agency's environmental justice strategy, annual implementation progress reports, and ongoing efforts to incorporate environmental justice principles into its programs, policies, and activities.

The VA Environmental Justice Strategy is a dynamic framework intended to be a living document. This strategy was drafted as an initial step in an ongoing effort to ensure integration of environmental justice objectives into VA's activities. VA has adopted the following three goals for its environmental justice strategy:

- Identify and address VA programs, policies, and activities that may have disproportionately high and adverse human health or environmental effects on minority, low-income, or tribal populations.
- Ensure transparent and accessible information sharing and promote public participation for programs, activities, and operations that have potential environmental justice implications.
- Identify areas to improve research and data collection methods.

3.15.2 Current Conditions

The affected area for identifying environmental justice populations based on minority and low-income status consists of the counties in the VA BHHCS service area, which covers western South Dakota, northwestern Nebraska, and eastern Wyoming (see Figure 1.1-1). The counties are listed in Tables 3.15-1 through 3.15-6.

Data on populations of concern and poverty status for purpose of identifying minority and low-income composition in the affected area are from the 2010 U.S. Census, with income adjusted for inflation to 2013 dollars. Poverty thresholds are updated annually for inflation by the U.S. Census Bureau and are used for calculating official poverty population statistics. The dollar value thresholds vary by family size and composition (adults and children), but do not vary geographically. The Census Bureau calculates a weighted average poverty threshold based on the relative number of families in each size and composition. The weighted average provides a general sense of the poverty level. For purposes of this EIS, the census categories of "all families" and "all people" are used, along with the weighted average poverty threshold for one and four persons.

3.15.2.1 Demographic Conditions: VA BHHCS Service Area in South Dakota

Table 3.15-1 presents demographic data for each of the counties in the VA BHHCS service area in South Dakota. The counties for which minority populations are identified based on the guidance in CEQ (1997) are Bennett, Corson, Dewey, Jackson, Mellette, Oglala Lakota (previously Shannon), Todd, and Ziebach. These counties represent the Indian reservations, and accordingly, these populations consist primarily of Native American people (Census 2010).

As shown in the table, minority persons in the VA BHHCS service area in South Dakota are approximately 27.9 percent of the population. In addition to the eight counties listed above, Lyman County's minority percentage is meaningfully greater (10 percentage points higher) than the service area. For comparison, the number of minority persons in the State of South Dakota is approximately 17.6 percent of the total population. The eight counties listed above along with Lyman County have minority population percentages that are meaningfully greater than the state's percentage.

The number of children, defined in the U.S. Census as persons 18 years and younger, varies among the counties. The percentage of children in the total population in the VA BHHCS service area and the State of South Dakota is fairly similar at approximately 25 percent.

Table 3.15-1. Populations of Concern, South Dakota Counties in VA BHHCS Service Area.

County	Total Population	Minority		Children	
		Number of Persons	Percent Total Population	Number of Persons	Percent Total Population
Bennett	3,431	2,341	68.2%	1,189	34.7%
Butte	10,110	890	8.8%	2,527	25.0%
Corson	4,050	2,952	72.9%	1,390	34.3%
Custer	8,216	661	8.0%	1,630	19.8%
Dewey	5,301	4,284	80.8%	1,803	34.0%
Fall River	7,094	966	13.6%	1,334	18.8%
Haakon	1,937	120	6.2%	431	22.3%
Harding	1,255	71	5.7%	292	23.3%
Hughes	17,022	2,979	17.5%	4,017	23.6%
Jackson	3,031	1,774	58.5%	997	32.9%
Jones	1,006	57	5.7%	225	22.4%
Lawrence	24,097	1,962	8.1%	4,720	19.6%
Lyman	3,755	1,606	42.8%	1,106	29.5%
Meade	25,434	2,802	11.0%	6,415	25.2%
Mellette	2,048	1,264	61.7%	661	32.3%
Oglala Lakota	13,586	13,487	99.3%	5,342	39.3%
Pennington	100,948	20,642	20.4%	24,837	24.6%
Perkins	2,982	112	3.8%	639	21.4%
Stanley	2,966	317	10.7%	721	24.3%
Todd	9,612	8,918	92.8%	3,857	40.1%
Tripp	5,644	1,015	18.0%	1,323	23.4%
Ziebach	2,801	2,278	81.3%	1,095	39.1%
Total for VA BHHCS service area in South Dakota	256,326	71,498	27.9%	66,551	25.9%
South Dakota	844,877	148,698	17.6%	207,840	24.6%

Source: Census 2010.

Table 3.15-2 shows the percentage of families and individuals living below the poverty level in the South Dakota counties in the VA BHHCS service area. Bennett, Corson, Dewey, Mellette, Oglala Lakota, Todd, and Ziebach Counties have families or persons living below the poverty level at a meaningfully greater percentage (10 percentage points higher) than the VA BHHCS service area in South Dakota and the State of South Dakota. The average percentage of families and persons living below the poverty level in the VA BHHCS service area in South Dakota is not meaningfully greater than the state's percentage.

Table 3.15-2. Poverty Information, South Dakota Counties in VA BHHCS Service Area.

County	Families Below Poverty Level[1]	Persons Below Poverty Level[1]
Bennett	30.3%	39.3%
Butte	7.2%	10.2%
Corson	32.1%	44.2%
Custer	5.1%	10.3%
Dewey	24.8%	33.3%
Fall River	12.1%	17.4%
Haakon	12.7%	14.9%
Harding	14.6%	17.6%
Hughes	6.0%	11.4%
Jackson	14.5%	22.3%
Jones	11.0%	14.4%
Lawrence	8.2%	14.4%
Lyman	13.6%	17.0%
Meade	8.5%	11.0%
Mellette	27.7%	36.6%
Oglala Lakota	45.4%	53.2%
Pennington	8.9%	13.5%
Perkins	6.9%	14.1%
Stanley	7.1%	10.2%
Todd	39.1%	44.6%
Tripp	16.1%	20.6%
Ziebach	39.3%	42.3%
Aggregate average for VA BHHCS service area in South Dakota	18.3%	23.9%
South Dakota	9.1%	14.1%
Weighted average poverty threshold	$23,834[2]	$11,888[3]

[1] Based on 2013 inflation adjusted dollars.
[2] Four-person family.
[3] One person.
Source: Census 2013a, 2013b.

3.15.2.2 Demographic Conditions: VA BHHCS Service Area in Nebraska

Table 3.15-3 presents demographic data for each of the counties in the VA BHHCS service area in Nebraska. Minority persons do not exceed 50 percent of the population in any county. As shown in the table, minority persons in the VA BHHCS service area in Nebraska are approximately 24.6 percent of the population, which is approximately the same as the State of Nebraska at 24.9 percent. No county has a percentage of minority persons that is meaningfully greater (10 percentage points higher) than the VA BHHCS service area in Nebraska. However, Scotts Bluff County's minority percentage is meaningfully greater than the state's percentage.

The percentage of children in the total population in the VA BHHCS service area and the State of Nebraska are similar at approximately 24 percent.

Table 3.15-3. Populations of Concern, Nebraska Counties in VA BHHCS Service Area.

		Minority		Children	
County	Total Population	Number of Persons	Percent Total Population	Number of Persons	Percent Total Population
Box Butte	11,308	2,316	20.5%	2,849	25.2%
Cherry	5,713	628	11.0%	1,265	22.1%
Dawes	9,182	1,280	13.9%	1,766	19.2%
Garden	2,057	150	7.3%	382	18.6%
Grant	614	17	2.8%	115	18.7%
Morrill	5,042	1,129	22.4%	1,210	24.0%
Scotts Bluff	36,970	12,448	33.7%	9,152	24.8%
Sheridan	5,469	1,011	18.5%	1,293	23.6%
Sioux	1,311	103	7.9%	293	22.3%
Total for VA BHHCS service area in Nebraska	77,666	19,082	24.6%	18,325	23.6%
Nebraska	1,868,516	377,440	20.2%	465,260	24.9%

Source: Census 2010.

Table 3.15-4 shows the percentage of families and individuals living below the poverty level in the Nebraska counties in the VA BHHCS service area. None of the counties have families or persons living below the poverty level at a meaningfully greater percentage (10 percentage points higher) than the VA BHHCS service area. However, the percentage of individuals below the poverty level in Box Butte County is meaningfully greater than the state's percentage.

Table 3.15-4. Poverty Information, Nebraska Counties in VA BHHCS Service Area.

County	Families Below Poverty Level[1]	Persons Below Poverty Level[1]
Box Butte	17.3%	23.9%
Cherry	6.1%	13.0%
Dawes	7.8%	19.3%
Garden	7.2%	9.4%
Grant	10.3%	18.8%
Morrill	10.9%	13.8%
Scotts Bluff	10.2%	13.7%
Sheridan	12.9%	16.0%
Sioux	7.7%	9.3%
Aggregate average for VA BHHCS service area in Nebraska	10.04%	15.24%
Nebraska	8.6%	12.8%
Weighted average poverty threshold	$23,834[2]	$11,888[3]

[1] Based on 2013 inflation adjusted dollars.
[2] Four-person family.
[3] One person.
Source: Census 2013a, 2013b.

3.15.2.3 Demographic Conditions: VA BHHCS Service Area in Wyoming

Table 3.15-5 presents demographic data for each of the counties in the VA BHHCS service area in Wyoming. Minority persons do not exceed 50 percent of the population in any county. As shown in the table, minority persons in the VA BHHCS service area in Wyoming are approximately 6.1 percent of the population. No county has a percentage of minority persons that is meaningfully greater (10 percentage points higher) than the VA BHHCS service area in Wyoming. The minority population percentages of each county and the VA BHHCS service area are all less than the State of Wyoming's percentage.

Table 3.15-5. Populations of Concern, Wyoming Counties in VA BHHCS Service Area.

County	Total Population	Minority		Children	
		Number of Persons	Percent Total Population	Number of Persons	Percent Total Population
Crook	7,083	340	4.8%	1,689	23.8%
Niobrara	2,484	139	5.9%	470	18.9%
Weston	7,208	539	7.5%	1,573	21.8%
Total for VA BHHCS service area in Wyoming	16,775	1,018	6.1%	3,732	22.2%
Wyoming	582,658	98,469	16.9%	137,507	23.6%

Source: Census 2010.

The percentages of children in the total population in the VA BHHCS service area and the State of Wyoming are similar at approximately 22 to 23 percent.

Table 3.15-6 shows the percentage of families and individuals living below the poverty level in the Wyoming counties in the VA BHHCS service area. None of the counties have families or persons living below the poverty level at a meaningfully greater percentage (10 percentage points higher) than the VA BHHCS service area in Wyoming or the State of Wyoming. The percentages of families and persons living below the poverty level in the VA BHHCS service area in Wyoming is the same as the State of Wyoming.

Table 3.15-6. Poverty Information, Wyoming Counties in VA BHHCS Service Area.

County	Families Below Poverty Level[1]	Persons Below Poverty Level[1]
Crook	4.3%	6.7%
Niobrara	8.8%	16.3%
Weston	9.0%	11.2%
Aggregate average for VA BHHCS service area in Wyoming	7.4%	11.4%
Wyoming	7.7%	11.5%
Weighted average poverty threshold	$23,834[2]	$11,888[3]

[1] Based on 2013 inflation adjusted dollars.
[2] Four-person family.
[3] One person.
Source: Census 2013a, 2013b.

3.16 Other Past, Present, and Reasonably Foreseeable Projects

This section identifies other past, present and reasonably foreseeable projects and actions that are considered in the evaluation of cumulative impacts. Data sources include:

- VA BHHCS
- U.S. Forest Service, Black Hills National Forest
- South Dakota Department of Environment and Natural Resources
- South Dakota Public Utility Commission
- South Dakota Department of Transportation
- Nuclear Regulatory Commission (EIS for the Dewey-Burdock Project in Custer and Fall River Counties. Supplement to the Generic EIS for In-Situ Leach Uranium Mining Facilities. January 2014)
- EPA databases for other recent EISs within South Dakota
- In-person observations

Table 3.16-1 lists the projects identified during this process.

Table 3.16-1. Projects Considered in Cumulative Impacts Analysis.

Project Description
Expansion of State Veterans Home in Hot Springs 2500 Minnekahta Avenue, Hot Springs, SD Construction of new 133,000 ft^2 two-story building at the Michael J. Fitzmaurice South Dakota Veteran's Home and demolition of existing Building 4 (previously used as an infirmary)
Fall River County Health Service (Hospital) 1209 Highway 71 South, Hot Springs, SD Plans to update Castle Manor Nursing Home by building a new structure and bringing the services onto the campus of Fall River Health Services in next few years
Teckla-Osage-Lange 230-Kilovolt Transmission Line Crosses Black Hills National Forest from the South Dakota/Wyoming border through Pennington County to Pactola substation to the Lange substation northwest of Rapid City. Proposed 144-mile transmission line (Black Hills Power), including 37 miles of National Forest System land and through a right-of-way through Rapid City http://www.fs.usda.gov/project/?project=30774
Southern Black Hills Water System Construction and Operation Construction of water system to provide potable water to rural residents of Southern Black Hills area of South Dakota (along Argyle Road). Southern boundary of Phase I service area lies immediately north of Hot Springs; southern boundary of Phase II service area lies immediately northwest of Hot Springs.

Table 3.16-1. Projects Considered in Cumulative Impacts Analysis (continued).

Project Description
Transportation projects in Hot Springs area • US 79 Concrete pavement repair, northbound and southbound lanes, Junction US 18 (runs through Hot Springs) north to Junction SD-36 (http://sddot.com/travelers/docs/ConstructionMap.pdf) • US 18 from junction with US 385 to the southeast city limits of Hot Springs; urban reconstruction, grading, surfacing, curb and gutter, sidewalk, roadway lighting
Transportation projects in Rapid City area • I-90 westbound, exit 30, deceleration land extension • I-90 North service road, from exit 44 to exit 46, near Piedmont in Meade County; grading, gravel surfacing, and structures • US 16 - Mt. Rushmore Road between Tower Road and Flormann Street in Rapid City; full urban reconstruction • SD 44 – Jackson Boulevard in Rapid City from Chapel Lane to Rapid Creek west of Argyle Street

In addition to these defined projects, there are other general community development objectives, resource uses, and disturbances that may occur in the Hot Springs and Rapid City areas. Table 3.16-2 lists examples of actions for which timing and location are generally not predictable in terms of their specific likelihood during construction or operation of VA's reconfigured BHHCS.

Table 3.16-2. Other Generalized Actions and Disturbances Considered in Cumulative Impacts Analysis.

Action	Description
Wildfires	The frequency, size and intensity of possible wildfires depend upon various factors, including weather, ignition means, and fuels loadings. The Black Hills area has a level of wildland fire fuel hazard as a result of mountain pine beetle destruction of pines.
Livestock grazing Range development	Developments include fencing, dugouts, wells, and spring developments. Permitted livestock grazing would continue on National Forest system and private lands.
Vegetation treatment	Commercial and non-commercial vegetation treatments would continue in the area. Treatments may include mechanical or chemical measures to achieve timber harvest, hardwood restoration, meadow restoration, and fuel treatments. These types of treatments may also occur on private land but at a smaller scale.
Recreational activities (motorized, hunting, fishing)	Recreation activities including hunting, fishing, hiking, skiing, and the use of off-road vehicles would continue in the area.

Table 3.16-2. Other Generalized Actions and Disturbances Considered in Cumulative Impacts Analysis.

Action	Description
Subdivision and development of residential areas in Fall River and Pennington Counties	Given current trends, it is likely that additional private lands may be subdivided and new residences constructed. Additional special use permits such as utility, water line, rights of way, and access/easements may be requested.
Special use permits related to utility lines and transmission line projects	The area contains telephone overhead and underground distribution and transmission power utility lines under special use permits. Maintenance is ongoing for these facilities.
Targets/goals for Rapid City as identified in 10-year Comprehensive Plan (adopted in 2014).	Examples include: • Downtown revitalization (Rapid City): Priorities are enhancing connections to and between major destinations, mixed income housing, employment space, and retail/entertainment; encourage and enhance infill development; encourage multi-family housing project in downtown area. • Study Box Elder drainage basin to identify future stormwater infrastructure needs in the area prior to development. • Plan for new north-south roadway connection between Rapid City Regional Airport and I-90; assess feasibility of connection between airport and rail to enhance efficiency of freight transfers. • Water and sewer infrastructure expansion.

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4.0 ENVIRONMENTAL CONSEQUENCES

This chapter presents the evaluation of the alternatives' direct, indirect, and cumulative environmental impacts. The sections of this chapter are organized by resource, with information presented in the same sequence as in Chapter 3 to provide a logical flow for the discussion. The baseline for determining potential impacts is the current condition described in Chapter 3. Each resource-specific section (Sections 4.1 through 4.15) 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 Impacts Summary Table in the Executive Summary summarizes the impacts of each alternative. Section 4.17 discusses the proposal's potential for generating substantial controversy (required by the Department of Veterans Affairs' [VA's] interim *National Environmental Policy Act* (NEPA) guidance). Sections 4.18 through 4.20 provide specific analyses required by the Council on Environmental Quality's (CEQ's) NEPA regulations: unavoidable adverse impacts, the relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity, and irreversible or irretrievable commitments of resources.

Because certain aspects of the alternatives are not narrowly defined at this stage of project development (such as the specific location of new construction in the Hot Springs or Rapid City areas), a conservative scenario of environmental effects for each resource is evaluated throughout this chapter. This approach ensures an estimate of any adverse impacts that is unlikely to be exceeded in the actual design and implementation of an alternative.

As discussed in Section 1.3, it is beyond the scope of this environmental impact statement (EIS) (and not subject to NEPA review) to determine the health care services that VA offers or will offer at any location, even though some relevant service information is included in Chapter 2 to provide context for the features of the alternatives. Details of health care services are only discussed in this chapter as they are incidental to impacts of the alternatives in terms of physical buildings and infrastructure.

Impact Terminology

An ***impact*** is defined as a modification of the existing environment that is brought about by an outside action. The terms ***effect*** and ***impact*** as used in this document are synonymous and could be beneficial or adverse.

Adverse impacts are defined in terms of context and intensity. ***Context*** relates to environmental circumstances at the location of the impact and its immediate vicinity, as well as other interests that are potentially affected. ***Intensity*** refers to the severity or extent of the impact or magnitude of change from existing conditions. Impact intensity is used in the determination of the severity and magnitude of an impact, and helps determine whether mitigation is needed to lessen the impact. The following terms are among those that are applied in this EIS to describe the intensity of adverse impacts:

- None/no impact: No change from current conditions.
- Negligible impacts: No measurable or discernible change from current conditions.
- Minor impacts: Slight but detectable; there would be a small change. Effects are generally short-term and highly localized.
- Moderate impacts: Readily apparent; there would be a noticeable change that could result in major short-term or moderate long-term impacts.
- Major impacts: Large and highly noticeable; long-term or permanent.

The duration of the impact is important in evaluating its intensity:

- Short-term impacts occur only for a short time after implementation of a management action; for example, construction noise impacts from construction activities would be considered short-term in nature.
- Long-term impacts occur for an extended period after implementation of a management action; for example, operational noise during facility operations would be a long-term impact, as it would last for as long as the facility is in operation.

Direct effects are caused by the action and occur at the same time and place as the action. ***Indirect effects*** are caused by the action and occur later in time or further in distance, but are still reasonably foreseeable (40 Code of Federal Regulations [CFR] 1508.8).

Cumulative impacts are those effects resulting from the incremental impacts of an action when combined with other past, present, and reasonably foreseeable future actions (regardless of which agency or person undertakes such actions) (40 CFR 1508.7). Cumulative impacts could result from individually insignificant but collectively significant actions taking place over a period of time.

Mitigation Measures

The CEQ NEPA regulations (40 CFR 1508.20) state that ***mitigation*** includes:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

The measures and best practices identified in this 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. The record of decision (ROD) for an EIS binds an agency to implement specific mitigation

commitments stated in the ROD. In addition, compliance with regulatory requirements is enforced by the respective regulatory agency. For example, compliance with air quality regulations would be enforced by the South Dakota Department of Environment and Natural Resources (SDDENR). Where relevant for a particular alternative, the mitigation, monitoring, minimization, and best practices summarized in Chapter 5 could reduce adverse impacts identified in this chapter.

4.1 Aesthetics

4.1.1 Evaluation Criteria

A visual or aesthetic impact is the creation of an intrusion, obstruction, or noticeable contrast to the landscape that affects visual character or scenic quality. A visual effect can be considered adverse if an action obstructs what most observers would consider a scenic view or blocks or detracts from a significant feature of the landscape. The introduction of a visual element that is incompatible, out of scale, in great contrast, or out of character with the surrounding area can be an adverse visual impact. An action that eliminates open space can have an adverse effect on aesthetic or visual appeal of the area. Together with observers' attitudes, expectations, and perspectives, the extent of obstruction and the compatibility of introduced features within established views determine the subjective importance or intensity of the visual impact.

In regard to a historic property, adverse visual effects are those that diminish the property's integrity, which negatively affects its historic significance and its eligibility for listing in the National Register of Historic Places (NRHP). Visual impacts on historic properties are discussed in Section 4.3.

4.1.2 Alternative A

4.1.2.1 Impacts from Construction

Because there would be no changes to existing buildings or construction of new buildings on the VA Hot Springs campus, the visual appearance and aesthetic quality of the campus would not be affected.

Construction activities in Hot Springs for a community-based outpatient clinic (CBOC) and in Rapid City for a multi-specialty outpatient clinic (MSOC) and residential rehabilitation treatment program (RRTP) would temporarily affect the visual quality of the area because of the presence of heavy equipment and unfinished stages of site preparation and building construction. The visual quality impacts would change over the course of the phased construction as each task is completed, progressing toward being negligible in the later stages as landscaping is completed and work focuses on the interiors of completed buildings. The extent of the impact would depend on the visual or scenic quality of the site selected in each community, and the presence and expectations of observers of the site. Because the size of the site and building proposed in Hot Springs (a CBOC on five acres) is smaller than that proposed in Rapid City (14 to 17 acres for a co-located MSOC and RRTP), the extent of any visual impact from and during construction activities would be less in Hot Springs in both space and time.

Construction activities would be limited to daylight hours so there would be no impact from nighttime lighting from the use of construction equipment lights. Security lighting could be required for construction staging areas, which would have a minor impact relative to nighttime light levels near the sites; however, security lighting would be directed downward to minimize light trespass onto adjacent property and land uses.

4.1.2.2 Impacts from Operation

VA would continue to maintain the Hot Springs campus so there would be no change or effect to the visual or aesthetic appearance of the campus, although health care operations would cease at this location.

The size and height of each building proposed for Hot Springs and Rapid City would vary as described in Section 2.3.1, and could affect the visual appearance of the site selected in each community. These buildings could create a noticeable contrast to the landscape surrounding the selected site. An undeveloped site on the suburban edge of the community could intrude on the scenic quality of the surrounding landscape, whereas an infill development would not likely affect a scenic landscape. The extent of any impact would depend on the visual or scenic quality of the selected site in each community and surrounding land uses, and would also depend on the compatibility of the buildings with existing or planned land use and zoning of the selected sites. Building setbacks, perimeter fences, and landscaping must conform to physical security and antiterrorism design requirements for VA facilities defined as mission critical. These requirements, along with incorporating the topography into the site layout, could minimize any noticeable presence of the buildings.

Exterior lighting around the buildings would be controlled to minimize light trespass onto adjacent properties but would be designed to provide sufficient illumination to meet physical security requirements. Lighting on roads internal to a larger site for a combined MSOC and RRTP in Rapid City would provide enough intensity so that drivers, pedestrians, and bicyclists can identify directional signage, access gates, lanes, and curbs. Exterior light fixtures would use the cutoff design that directs light downward and minimizes glare.

4.1.3 Alternative B

4.1.3.1 Impacts from Construction

Because there would be no changes to existing buildings or construction of new buildings on the VA Hot Springs campus, the visual appearance and aesthetic quality of the campus would not be affected.

Visual or aesthetic impacts from construction would be similar to the impacts described for Alternative A. Because only an MSOC (10 acres) is proposed for Rapid City, the extent of any temporary construction-related impact on the visual quality of the selected site could be less than in Hot Springs where a co-located CBOC and RRTP (11 to 13 acres) are proposed.

4.1.3.2 Impacts from Operation

VA would continue to maintain the Hot Springs campus so there would be no change or effect to the visual or aesthetic appearance of the campus, although health care operations would cease at this location.

The size and height of each building proposed for Hot Springs and Rapid City would vary as described in Section 2.3.2, and could affect the visual appearance of the site selected in each community. Any impacts to the visual appearance or scenic quality of the selected sites from the design and placement of the buildings would be similar to the impacts described for Alternative A.

4.1.4 Alternative C

4.1.4.1 Impacts from Construction

Construction equipment and vehicles would be visible during interior renovations and modifications to Building 12 and the domiciliary. Because there would be no major exterior changes to or construction of new buildings on the VA Hot Springs campus, the temporary presence of construction equipment would not affect the visual appearance and aesthetic quality of the campus.

Visual or aesthetic impacts from construction of an MSOC on 10 acres in Rapid City would be similar to the impacts described for Alternative A.

4.1.4.2 Impacts from Operation

Health care operations and maintenance would continue at the VA Hot Springs campus, so there would be no change or affect to the visual or aesthetic appearance of the campus.

The size and height of the MSOC proposed for Rapid City would be as described in Section 2.3.1, and could affect the visual appearance of the selected site. Any impacts to the visual appearance or scenic quality of the selected site from the design and placement of the building would be similar to the impacts described for Alternative A.

4.1.5 Alternative D

4.1.5.1 Impacts from Construction

Because there would be no changes to existing buildings or construction of new buildings on the VA Hot Springs campus, the visual appearance and aesthetic quality of the campus would not be affected.

Visual or aesthetic impacts from construction would be similar to the impacts described for Alternative A. Because the size of the site and buildings proposed in Hot Springs (11 to 13 acres for co-located CBOC and RRTP) is slightly smaller than what would be needed in Rapid City (14 to 17 acres for co-located MSOC and RRTP), the extent of any visual impact from and during construction activities could be slightly less in Hot Springs in both space and time.

4.1.5.2 Impacts from Operation

VA would continue to maintain the Hot Springs campus so there would be no change or effect to the visual or aesthetic appearance of the campus, although health care operations would cease at this location.

The size and height of each building proposed for Hot Springs and Rapid City would vary as described in Section 2.3.4, and could affect the visual appearance of the site selected in each community. Any impacts to the visual appearance or scenic quality of the selected sites from the design and placement of the buildings would be similar to the impacts described for Alternative A.

4.1.6 Alternative E

4.1.6.1 Impacts from Construction

Construction equipment and vehicles would be visible during interior and exterior renovations and modifications of numerous buildings on the Hot Springs campus and during construction of new buildings to accommodate additional RRTP beds and housing as described in Section 2.3.5. Open space that might be suitable for new buildings is scattered throughout the campus, so the presence of construction equipment and ongoing construction activities would temporarily affect the visual appearance and aesthetic quality of the campus.

Because no modifications to the existing CBOC in Rapid City are proposed and an MSOC would not be constructed, there would be no temporary effects at sites within Rapid City or off-campus in Hot Springs on aesthetics or visual appearance from construction activities.

4.1.6.2 Impacts from Operation

Open space that might be suitable to construct a building for additional RRTP beds near the Hot Springs domiciliary is limited, and construction on that space would change the visual appearance and scenic quality of the original core of the campus. The building would likely be designed similar to the domiciliary for aesthetics, and any adverse effects would likely be minimal because of observers' expectations and attitudes regarding the additional building.

Construction of additional housing in open spaces within the loop near the staff quarters would also affect the visual appearance of this area. Similar housing designs and construction materials could minimize the visual intrusion and aesthetic impacts of new buildings. Simulated views of additional housing adjacent to the existing housing are shown in Figure 4.1-1.

Construction of new buildings for the RRTP and housing on the open space at the main entrance from North 5th Street would affect the visual appearance and scenic quality of the campus. These buildings would be out of character for the entrance but would likely be seen by observers as compatible with the view; thus, any adverse visual effects would be minimal.

There would be no changes to health care operations in Rapid City that would have any effect on aesthetics or visual quality of the area.

Figure 4.1-1. Visual Simulations of Possible Locations for Additional Housing.

4.1.7 Alternative F

4.1.7.1 Impacts from Construction

Upgrades and renovations to buildings to maintain clinical standards would be initiated as funding was available through the routine budgeting process. Construction equipment and vehicles would be visible during interior renovations and modifications to buildings. Because there would be no major exterior changes or construction of new buildings on the VA Hot Springs campus, the temporary presence of construction equipment would not affect the visual appearance and aesthetic quality of the campus.

There would be no changes to the existing CBOC in Rapid City that would have any temporary effects on aesthetics or visual appearance from construction activities. If other space is leased upon the expiration of the current lease, that new location could require interior modifications to the building. Any impacts to the visual appearance of the area would be limited to the temporary presence of construction vehicles.

4.1.7.2 Impacts from Operation

Health care operations and maintenance would continue at the VA Hot Springs campus. The VA Black Hills Health Care System (BHHCS) has no plans that would require construction of new buildings or major exterior modifications or additions to existing buildings to support operations, so there would be no change or affect to the visual or aesthetic appearance of the campus.

There would be no changes to health care operations in Rapid City that would have any effect on aesthetics or visual quality of the area.

4.1.8 Supplemental Alternative G

4.1.8.1 Impacts from Construction

The effects on the visual appearance or scenic quality of the VA Hot Springs campus would depend on the selected re-use. Should the selected re-use include construction of new buildings on the campus or major exterior modifications or additions, construction activities and the presence of construction equipment would temporarily affect the visual appearance of the campus. The extent of the visual impact would depend on the location, size, and timing of construction. Impacts could be similar to those from Alternatives E (if some new construction was initiated) or F (if there was no new construction).

4.1.8.2 Impacts from Operation

The type of re-use of the VA Hot Springs campus would determine the extent of effects to the visual appearance, aesthetics, or scenic quality of the campus. The addition and placement of new buildings on the campus to support different operations could have a visual effect on the campus landscape and appearance, and would be similar to the impacts described for Alternative E. If no new buildings are constructed and the overall level of campus activity is similar to that due to current VA health care services, operational impacts would be similar to those of Alternative F.

4.2 Air Quality

4.2.1 Evaluation Criteria

All of South Dakota is in attainment or unclassified for all National Ambient Air Quality Standards (NAAQS). The alternatives are evaluated for their potential to result in a net increase in pollutants that causes or contributes to a violation of the NAAQS, exposes sensitive receptors to substantially increased pollutant concentrations, or exceeds any evaluation criteria established by a state implementation plan.

For this EIS, the proposed action occurs in an attainment area, therefore the *de minimis* levels do not apply and no conformity determination is required for proposed federal actions.

4.2.2 Alternative A

Alternative A would have short-term minor impacts to air quality during construction of new facilities in Rapid City and Hot Springs. In the long term, the impact to air quality from operations would be negligible as a result of operating from newer facilities designed for energy efficiency in accordance with VA Office of Construction & Facilities Management (CFM) guidelines.

4.2.2.1 Impacts from Construction

The overall construction period for each new facility (CBOC in Hot Springs, MSOC and RRTP in Rapid City) would be approximately two years, with site clearing, excavation, and grading largely accomplished in the first year. Should VA BHHCS lease facilities, air quality impacts from potential customization of the facility for VA use would be minimal, less than those from constructing a new facility.

Particulates are the main air pollutant of concern from construction projects. VA would comply with the South Dakota Natural Events Action Plan, Pennington County Ordinance 12 and Rapid City Code of Ordinance 8.34, both of which are titled *Fugitive Emissions and the Abatement of Smoke*, where applicable. Figure 3.2-1 and 3.2.-2 illustrate the Rapid City area locations subject these local rules. The Natural Events Action Plan applies to the west Rapid City area (see Figure 3.2-2) and requires, in part, voluntary cessation of construction or use of control measures during high wind dust alerts.

Reasonably available control technology requirements for minimizing fugitive dust during construction activities, listed in Pennington County Ordinance 12 and Rapid City Code of Ordinance 8.34, include but are not limited to:

- Wetting down
- Chemical stabilization
- Applying dust palliative
- Minimization of area disturbed
- Reclamation of disturbed area as soon as possible
- Vehicular speed limitation
- Cleaning of paved areas

Construction activities would generate both coarse and fine particulate emissions from excavation, soil removal, site grading, and small-scale road construction. The amount of particulate emissions can be estimated from the amount of ground surface exposed, the type and intensity of activity, soil type and conditions, wind speed, and dust control measures used. Total suspended particulates were calculated using the emission factor for heavy construction activity operations specified in AP-42 Compilation for Air Pollutant Emission Factors (EPA 1995) resulting in conservative estimates of particulate emissions shown in Table 4.2-1. Reasonably available control technology requirements for construction activities would be applied.

Table 4.2-1. Estimated Year 1 Particulate Emissions from Construction—Alternative A

Facility	Lot size (acres)	Construction Duration (months)	Emission Factor (tons/acre/ month)*	Control Efficiency (%)	Total Particulate Emissions (tons/year)
Hot Springs CBOC	5	12	1.2	80	14.4
Rapid City MSOC	10	12	1.2	80	28.8
Rapid City RRTP	10	12	1.2	80	28.8
Total	25	12			72

*Emission factor from Section 13.2.3 "Heavy Construction Operations" (dated 1/95), of AP-42 (EPA 1995).

The estimated 57.6 tons of particulates emitted from VA's Rapid City construction would be a 0.53 percent increase in the approximately 10,800 tons per year of particulates already emitted annually in Pennington County (EPA 2015). The 14.4 tons emitted from Hot Springs construction would be a 0.33 percent increase in the approximately 4,365 tons per year of particulates already emitted in Fall River County (EPA 2015). Thus, fugitive dust emissions from construction under Alternative A would have a negligible impact on regional air quality.

4.2.2.2 Impacts from Operation

Under Alternative A, VA BHHCS emissions from the existing Hot Springs VA Medical Center (VAMC) facilities would be reduced, although emissions from the campus would continue at some decreased level providing for facility maintenance or would be attributable to re-use of the campus, at a level estimated not to exceed the current emissions levels (as characterized for Alternative F, No Action, in Section 4.2.7).

Operation of newly or recently constructed facilities would produce air emissions through:

- Propane combustion for heat and hot water (Hot Springs)
- Propane storage and dispensing (Hot Springs)
- Natural gas combustion for heating and hot water (Rapid City)
- Electricity use (indirect emissions)
- Emergency generator(s) (RRTP only)
- Patient and employee commuting
- Ongoing maintenance and landscaping activities

In Hot Springs, the primary option for heating large facilities is propane stored onsite, and this is assumed to be the case for operation of new facilities in Hot Springs. Emissions from propane combustion would be directly attributable to VA BHHCS operations. Propane combustion produces mostly gaseous emissions and a lesser amount of particulate emissions. Pollutants from combustion (aside from carbon dioxide) are nitrogen oxides, carbon monoxide, sulfur dioxide, particulate matter (PM), and total organic compounds (EPA 1992). Fugitive emissions may also result from propane storage and dispensing, but these would be minimal compared to combustion emissions. The new facilities in Rapid City would be heated by natural gas supplied by the Montana-Dakota Utilities Company. It is further assumed that fuel oil combustion would continue at the Hot Springs VAMC in order to maintain existing facilities in an unoccupied state (assumed 30 percent of the fiscal year [FY] 2013 fuel oil combustion rate).

Estimated facility heating emissions are shown in Table 4.2-2 for each of the alternatives using the projected utility requirements provided in Section 4.14, *Utilities*.

Table 4.2-2. Estimate of Annual Emissions from Facility Heating under Each Alternative*

Alternative	Emissions (pounds per year)				
	Nitrogen oxides	Carbon monoxide	PM	Sulfur dioxide	Total Organic Compounds
A	3,691	968	457	5,084	158
B	3,909	1,152	459	5,084	160
C	9,860	2,124	1,338	16,933	259
D	3,847	1,067	464	5,085	168
E	12,415	2,604	1,703	21,894	295
F	9,620	2,022	1,318	16,932	230

*Emission factor from Volume 1, Chapter 1 "External Combustion Sources" of AP-42 (EPA 2010).

Electricity is provided to the existing VA facilities in Rapid City and Hot Springs by Black Hills Power. Black Hills Power would also provide electricity to the new facilities proposed in Alternative A. Indirect emissions from electricity generation are not calculated. The quantitative impact on overall electricity use is unknown from cessation of operations at existing facilities, movement of the Hot Springs campus into a maintenance status or re-use, and health care service operations at new facilities. However, it is likely that overall usage would decrease because newly constructed facilities would be designed to be more energy efficient (VA 2014).

An emergency generator would be required for the new 100-bed RRTP proposed to be constructed in Rapid City. Emissions would be minimal because it would only be operated if the primary electric supply was interrupted.

As illustrated by Table 2-2 in Section 2.1, Alternative A would improve geographic access to care, with reduced patient travel distances. Emissions from mobile sources would decrease proportionately under Alternative A compared to No Action (Alternative F). Ongoing maintenance and landscaping activities would not contribute measurably to operational emissions.

According to the VA Design Guide for Mental Health Facilities (VA 2014), the U.S. Green Building Council Leadership in Energy and Environmental Design Project Certification is a recommended standard. The following codes and standards are adopted for new construction at a minimum:

- *Energy Policy Act of 2005*
- Energy Efficiency Standards and Energy Code for New Federal Commercial and Multi-Family Residential Buildings (10 CFR Parts 433, 434 and 435)
- The 16-agency (including VA) memorandum of understanding committing to design, construct, and operate their facilities in an energy-efficient and sustainable manner, *Federal Leadership in High Performance and Sustainable Buildings*
- Executive Order 13423, Strengthening Federal Environmental, Energy, Transportation Management
- Executive Order 13148, Greening the Government through Leadership in Environmental Management

4.2.3 Alternative B

Alternative B would have short-term minor impacts to air quality during construction of new facilities in Rapid City and Hot Springs. In the long term, the impact to air quality from operations would be negligible as a result of operating from newer facilities designed for energy efficiency in accordance with VA CFM guidelines.

4.2.3.1 Impacts from Construction

The air quality impacts from construction would be the same as under Alternative A except the RRTP would be built in Hot Springs, changing the location of emissions. Table 4.2-3 shows the estimated particulate emissions from construction under Alternative B.

Table 4.2-3. Estimated Year 1 Particulate Emissions from Construction—Alternative B

Facility	Lot size (acres)	Construction Duration (months)	Emission Factor (tons/acre/ month)*	Control Efficiency (%)	Total Particulate Emissions (tons/year)
Hot Springs CBOC	5	12	1.2	80	14.4
Hot Springs RRTP	10	12	1.2	80	28.8
Rapid City MSOC	10	12	1.2	80	28.8
Total	25	12			72

*Emission factor Section 13.2.3 "Heavy Construction Operations" (dated 1/95), of AP-42 (EPA 1995).

The estimated 28.8 tons of particulates emitted from VA's Rapid City construction would be a 0.27 percent increase in the approximately 10,800 tons per year of particulates already emitted annually in Pennington County (EPA 2015). The 43.2 tons emitted from Hot Springs construction would be a 0.93 percent increase in the approximately 4,365 tons per year of particulates already emitted in Fall

River County (EPA 2015). Thus, fugitive dust emissions from construction under Alternative B would have a negligible impact on regional air quality.

4.2.3.2 Impacts from Operation

The air quality impacts from Alternative B would be similar to Alternative A except the RRTP is built in Hot Springs where the primary option for heat and hot water is propane. Emissions from propane combustion would be greater because propane would be required for both the CBOC and RRTP. The Rapid City MSOC would be heated with natural gas. Emissions projections are shown in Table 4.2-2.

4.2.4 Alternative C

Air quality impacts from Alternative C would be similar to but less than those from Alternative B. This alternative would produce less short-term emissions from construction than either Alternative A or B due to smaller areas developed for new construction. In the long term, the impact to air quality would be minor to moderate.

4.2.4.1 Impacts from Construction

Construction impacts would be less than for Alternative A and B because there would be no new construction in Hot Springs and only the MSOC in Rapid City. Emissions from renovations to develop the CBOC and RRTP within existing buildings at the Hot Springs campus would be negligible on a regional scale. Estimated construction emissions from Alternative C are provided in Table 4.2-4.

Table 4.2-4. Estimated Year 1 Particulate Emissions from Construction—Alternative C

Facility	Lot size (acres)	Construction Duration (months)	Emission Factor (tons/acre/ month)*	Control Efficiency (%)	Total Particulate Emissions (tons/year)
Rapid City MSOC	10	12	1.2	80	28.8
Total	25	12			28.8

*Emission factor Section 13.2.3 "Heavy Construction Operations" (dated 1/95), of AP-42 (EPA 1995).

The estimated 28.8 tons of particulates emitted from VA's Rapid City construction would be a 0.27 percent increase in the approximately 10,800 tons per year of particulates already emitted annually in Pennington County (EPA 2015). Negligible particulate emissions would be associated with renovations to existing facilities in Hot Springs. Thus, fugitive dust emissions from construction under Alternative C would have a negligible impact on regional air quality.

4.2.4.2 Impacts from Operation

In this alternative, the Hot Springs campus would continue to operate, using fuel oil combustion as the heat source. Air quality impacts for the MSOC in Rapid City would be the same as Alternative A. Total emissions projections for this alternative are shown in Table 4.2-2 and are comparable to Alternative F, No Action.

4.2.5 Alternative D

Alternative D would have short-term minor impacts to air quality during construction of new facilities in Rapid City and Hot Springs. In the long term, the impact to air quality from operations would be negligible as a result of operating from newer facilities designed for energy efficiency in accordance with VA CFM guidelines.

4.2.5.1 Impacts from Construction

Construction impacts would be similar to but slightly greater than for Alternative A or B because two separate RRTPs would be constructed.

The total construction period for each facility would be approximately two years, with most of the site excavation and grading accomplished in the first year. Table 4.2-5 shows the estimated particulate emissions from construction under Alternative D.

Table 4.2-5. Estimated Year 1 Particulate Emissions from Construction—Alternative D

Facility	Lot size (acres)	Construction Duration (months)	Emission Factor (tons/acre/ month)*	Control Efficiency (%)	Total Particulate Emissions (tons/year)
Hot Springs CBOC	5	12	1.2	80	14.4
Hot Springs 24-bed RRTP	6	12	1.2	80	17.3
Rapid City MSOC	10	12	1.2	80	28.8
Rapid City 76-bed RRTP	10	12	1.2	80	28.8
Total	25	12			89.3

*Emission factor Section 13.2.3 "Heavy Construction Operations" (dated 1/95), of AP-42 (EPA 1995).

The estimated 14.4 tons of particulates emitted from VA's Rapid City construction would be a 0.063 percent increase in the approximately 23,000 tons per year of particulates already emitted annually in Pennington County. The 7.9 tons emitted from Hot Springs construction would be a 0.0089 percent increase in the approximately 89,000 tons per year of particulates already emitted in Fall River County. Thus, fugitive dust emissions from construction under Alternative D would have a negligible impact on regional air quality.

4.2.5.2 Impacts from Operation

The air quality impacts from Alternative D would be similar to those for Alternatives A or B, with variances based on the facility location and related heating source fuel. Propane combustion would be required for both the Hot Springs CBOC and RRTP. The Rapid City MSOC and RRTP would be heated with natural gas. It is further assumed that fuel oil combustion would continue at the Hot Springs VAMC in order to maintain existing facilities in an unoccupied state (assumed 30 percent of the FY 2013 fuel oil combustion rate). Emissions projections are shown in Table 4.2-2.

4.2.6 Alternative E

Alternative E would have short-term minor impacts to air quality during construction of new facilities on the Hot Springs campus. In the long term, the impact to air quality from operations would be similar to or slightly greater than those from Alternative F (No Action), due to operation from all existing facilities plus operation of new buildings on the Hot Springs campus.

4.2.6.1 Impacts from Construction

Construction under Alternative E would consist of constructing an 82-bed RRTP on the Hot Springs campus to provide the total capacity of 200 beds specified in the Save the VA proposal.

Construction impacts would be less than for Alternatives A, B, or C because there would be no new construction in Rapid City and the only construction in Hot Springs would be on limited areas on the Hot Springs campus. Emissions from renovations to develop the various facilities and improvements proposed within existing buildings on the Hot Springs campus would be negligible on a regional scale. Estimated construction emissions from Alternative E are provided in Table 4.2-6.

Table 4.2-6. Estimated Year 1 Particulate Emissions from Construction—Alternative E

Facility	Lot size (acres)	Construction Duration (months)	Emission Factor (tons/acre/ month)*	Control Efficiency (%)	Total Particulate Emissions (tons/year)
Hot Springs construction	2	12	1.2	80	5.8
Total	2	12			5.8

*Emission factor Section 13.2.3 "Heavy Construction Operations" (dated 1/95), of AP-42 (EPA 1995).

The estimated 5.8 tons of particulates emitted from VA's Rapid City construction would be a 0.13 percent increase in the approximately 4,365 tons per year of particulates already emitted annually in Fall River County (EPA 2015). Thus, fugitive dust emissions from construction under Alternative E would have a negligible impact on regional air quality.

4.2.6.2 Impacts from Operation

An increase in operational emissions due to expansion of services at the Hot Springs VAMC would be expected. It was assumed that any building renovations/additions would be connected to the existing fuel oil heating system, and fuel oil consumption would occur at the current rate (gallons per year per building square foot) scaled for the projected increase in facility size. The estimated emissions are presented in Table 4.2-2.

4.2.7 Alternative F

Alternative F would have no construction air quality impacts, as there would be no construction.

Emissions from facility heating (fuel oil combustion) and other operations would continue at levels shown in Table 4.2-2.

4.2.8 Supplemental Alternative G

4.2.8.1 Impacts from Construction

Under Alternative G, some or all of the existing facilities at the Hot Springs VAMC would be re-used by other tenants. Depending on the intended use, some facility renovation may be required. Air quality construction impacts would be minimal as facilities would largely be repurposed and building renovations would not disturb significant areas. Air quality impacts from construction would likely be similar to Alternatives C, E, or F, depending on the extent of renovation or construction.

4.2.8.2 Impacts from Operation

Air quality impacts attributable to re-use of Hot Springs VAMC facilities by other tenants would be similar to those for Alternatives C, E, and F, depending on the re-use. It is assumed that occupied facilities would continue to be heated using the existing fuel oil combustion system, and unoccupied facilities would be heated only to maintain them in an unoccupied state. Actual emissions estimated would depend on the extent of facility reutilization.

4.3 Cultural Resources and Historic Properties

4.3.1 Evaluation Criteria

The CEQ regulations implementing NEPA provide the basis for evaluating the context and intensity of impacts to historic properties listed in or eligible for listing in the NRHP or the degree to which it may cause loss or destruction of significant cultural resources (40 CFR 1508.27(b)(8)). The Section 106 regulations implementing the *National Historic Preservation Act* define an adverse effect as an action that may directly or indirectly alter a characteristic that qualifies a property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR 800.5(a)(1)). An impact would be beneficial if the action results in the preservation of historic properties and their character.

4.3.2 Assessment Methodology

The alternatives to implementing the reconfiguration proposal have common components that would result in similar effects on historic properties. The assessment methodology for identifying potential effects separated the components into "on-campus" and "off-campus" actions. The alternatives would involve some extent of action on the existing VA Hot Springs campus and away from the campus at some new location(s) yet to be identified in the Hot Springs and Rapid City areas. On-campus actions focus on vacating (and relocating health care services to other locations) or renovating campus buildings, whereas off-campus actions focus on development (new construction or modifications to existing buildings) at different locations. Potential types of direct and indirect effects on historic properties were identified by VA BHHCS and consulting parties based on the on-campus or off-campus actions similar among the alternatives. The criteria for determining if a direct or indirect effect is adverse, along with examples of adverse effects (36 CFR 800.5(a)(1) and (2)) were applied to the identified potential effects. This assessment methodology also provided a basic approach to determining measures to resolve those adverse effects that are common across alternatives (see Section 5.2, Resolution of Adverse Cultural Resources Effects). Figures 4.3-1 and 4.3-2 diagram this assessment methodology for on-campus and off-campus actions and effects. In keeping with this assessment methodology, the presentation of impacts by alternative differs from the other resources, where impacts are presented as they relate to construction and operation.

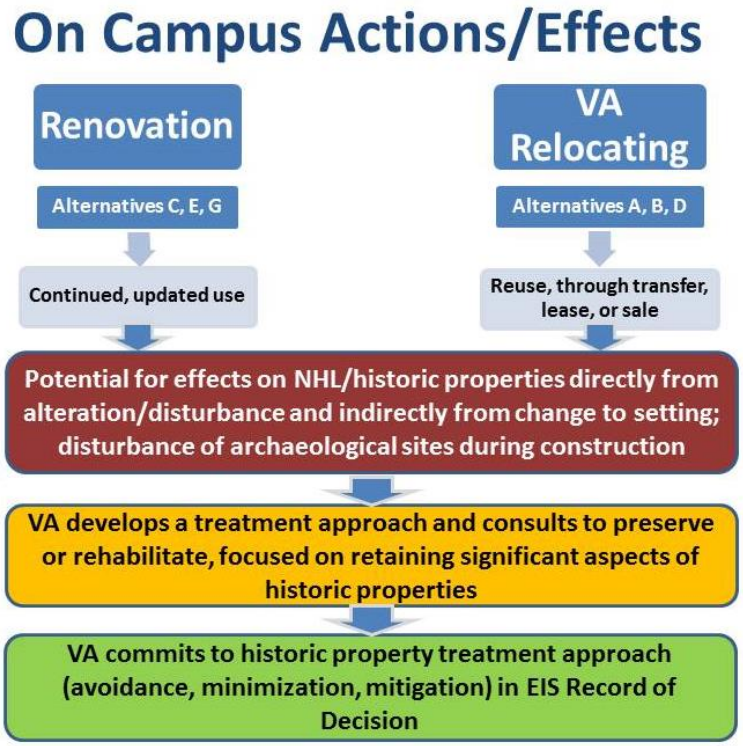

Figure 4.3-1. Assessment Methodology for On-Campus Actions and Effects.

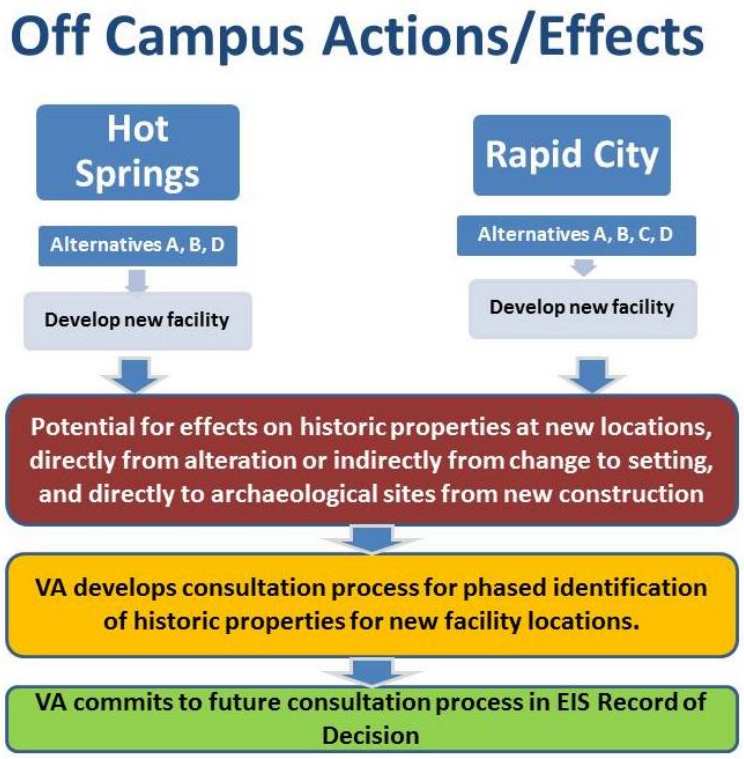

Figure 4.3-2. Assessment Methodology for Off-Campus Actions and Effects.

4.3.2.1 Types of Effects on Historic Properties and Other Cultural Resources

An effect is an alteration to the characteristics of a historic property qualifying it for the NRHP (36 CFR 800.13(i)). The same as for the other environmental resources (see Section 4.0), a direct effect is caused by the action and occurs at the same time and place (40 CFR 1508.8(a)), whereas an indirect effect is caused by the action and is later in time or farther removed in distance, but is still reasonably foreseeable (40 CFR 1508.8(b)).

Direct effects relate predominantly to the physical structure of the historic property or cultural resource:

- Battle Mountain Sanitarium National Historic Landmark (NHL) and its contributing resources (buildings and features) could be directly affected by physical modification, change in use, change in maintenance or upkeep of the buildings and campus, or other alteration.
- Hot Springs Historic District could be directly affected by any direct effects to the NHL, which is a contributing resource to the Historic District.
- Hot Springs/Battle Mountain traditional use area, or features or components of this area, could be directly affected if ground disturbance alters archaeological or cultural materials considered by Native American tribes to be associated with the traditional importance of the area.
- Other archaeological sites, historic building locations, or historic districts (identified during phased review (36 CFR 800.4(b)(2)) could be directly affected if relocated services occupy or change the use of buildings that are part of historic properties in the Hot Springs or Rapid City area, or if ground disturbance alters or results in unexpected discovery of archaeological or cultural materials.

Indirect effects relate predominantly to important aspects of historic setting, feeling, and association where these aspects are integral to conveying the character of historic properties:

- Battle Mountain Sanitarium NHL and its contributing resources, including the National Cemetery, could be indirectly affected if physical modifications or changes in use create substantial new contrasts to the historic setting of the NHL or alter its historic feeling and association.
- Hot Springs Historic District could be indirectly affected if substantial new contrasts are readily perceptible from the Historic District contributing resources or alter its historic feeling and association. Perceptible contrasts could include visible, audible, or atmospheric modifications at the NHL, which is located at an elevated position to the rest of the Historic District, or new construction in the Hot Springs area located within line of sight from the Historic District.
- Hot Springs/Battle Mountain traditional use area could be indirectly affected if substantial new contrasts are readily perceptible from traditional use places that retain their historic setting (natural environment of the Battle Mountain landform intact and undeveloped), or retain associated cultural features of traditional concern. Perceptible contrasts could include visible, audible, or atmospheric modifications at the NHL or a new construction location in the Hot Springs area.

- Other historic properties (identified during phased review (36 CFR 800.4(b)(2)) could be indirectly affected if buildings to support relocated services are readily perceptible (such as in line of sight) and create any substantial new contrasts to the historic setting, feeling, or association of these properties.

Direct and indirect effects (impacts) may vary in duration and depend on the stage of implementing an action:

- Temporary impact – occurs during construction and ends when a historic property is returned to preconstruction condition; for example, when construction components such as scaffolding, equipment, markers/barriers, and machinery noise are removed.
- Short-term impact – occurs more persistently, possibly enduring two to five years; for example, returning landscaping to its original setting through vegetation regrowth, or temporarily shuttering instead of mothballing a historic building while its re-use is being negotiated.
- Long-term impact – lasts for the life of an extended action; for example, reducing the recognizable historic character of a building through re-use for another purpose subject to a long-term lease.
- Permanent impact – results from an action that alters a historic property in a manner persisting indefinitely, or that is irreversible; for example, altering a building or its setting through new additions or remodeling inconsistent with its historic character.

4.3.2.2 Types of Adverse Effects on Historic Properties

An adverse effect is an alteration that diminishes the integrity of the location, design, setting, materials, workmanship, feeling, or association of a historic property. Adverse effects may include reasonably foreseeable effects caused by the action that may occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5(a)(1)). Examples of adverse effects include:

- Physical destruction of or damage to all or part of the property
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines
- Removal of the property from its historic location
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribes

- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance (30 CFR 800.5(a)(2))

The potential effects of the proposed on-campus and off-campus actions were analyzed against the criteria of adverse effects and compared to the examples above to determine if the impacts of the alternatives would adversely affect historic properties.

4.3.3 Alternative A

4.3.3.1 Impacts from On-Campus Actions

The on-campus actions under Alternative A would involve relocating health care services to other locations and vacating the VA Hot Springs campus including the Battle Mountain Sanitarium NHL. However, VA BHHCS would continue to maintain the campus pending transition to a future re-use. Maintenance of the National Cemetery would continue. Maintaining the campus could result in temporary shuttering or short-term mothballing of buildings. Maintenance would not likely result in substantial alterations or modifications to the NHL. VA BHHCS would monitor the condition of vacant (shuttered) buildings. If necessary, buildings would be mothballed following procedures outlined in the National Park Service Preservation Brief 31, Mothballing Historic Buildings (NPS 1993), with further consideration given due to the NHL status.

VA BHHCS would no longer offer health care services at the campus, which would diminish the character of the property's use that contributes to its historic significance, including the traditional feeling and association of the campus with the Veteran community. This adverse effect could be a permanent impact depending on future re-use of the campus.

Navigating between shuttering, mothballing, and re-use could be a temporary transition from current VA BHHCS occupancy to new occupancy, depending on interest from others (government, non-profit, and for-profit agencies and organizations) and options for a viable re-use. Mitigation measures (see Chapter 5) committed to by VA BHHCS would resolve an adverse effect. Re-use would be a permanent effect from VA BHHCS vacating the campus, and is assessed as Supplemental Alternative G.

4.3.3.2 Impacts from Off-Campus Actions

The off-campus actions under Alternative A would involve new construction or redevelopment/ renovation of facilities in the Hot Springs area for a CBOC and in the Rapid City area for an MSOC and 100-bed RRTP. VA BHHCS has not yet identified specific locations for these facilities.

Regardless of the size and specific location that could be selected, the potential exists for impacts on historic properties and cultural resources. The locations would be in the Black Hills, which have received millennia of human use and occupancy. Lands anywhere in the region have the potential to reflect this lengthy heritage in the form of prehistoric archaeological vestiges and Native American cultural materials and features, as well as in the historic debris and remnants of development following the nineteenth century establishment of Hot Springs and Rapid City. Ground-disturbing activities could encounter archaeological and cultural materials that could be impacted by physical damage or removal from their historic location. These could be permanent adverse effects.

However, mitigation and minimization measures identified in Chapter 5 would address adverse effects to archaeological resources.

A location that best meets the selection criteria (see Section 2.3) could require new construction, involve redeveloping non-historic buildings, or involve redeveloping historic buildings pursuant to Executive Order 13006, Locating Federal Facilities on Historic Properties in Our Nation's Central Cities. Alterations to historic buildings to accommodate health care services could result in adverse effects. Historic buildings or districts could be present in the surroundings of a selected location and could be indirectly affected by introduction of visual, atmospheric, or audible elements by the new development. This could be an adverse effect if the new development diminishes the integrity of significant historic features such as setting, or design. The effect could be temporary during construction or permanent upon completion of construction. If a proposed location is in the viewshed of a historic property, potential effects would be resolved during phased evaluation and subsequent consultation.

New locations for a CBOC in Hot Springs and an MSOC and RRTP in Rapid City would be subject to a phased review to identify and evaluate historic properties (36 CFR 800.4(b)(2)). Any discovery of cultural resources and historic properties during the phased review would be addressed following the commitments stated in the record of decision (36 CFR 800.13(a)(2)). Discoveries of human burial remains on federal land would be addressed according to the *Native American Graves Protection and Repatriation Act*, and on non-federal lands according to State of South Dakota Statutes, Chapter 34-27-25.

4.3.4 Alternative B

4.3.4.1 Impacts from On-Campus Actions

The on-campus actions under Alternative B would involve relocating health care services to other locations and vacating the VA Hot Springs campus including the Battle Mountain Sanitarium NHL. However, VA BHHCS would continue to maintain the campus pending transition to a future re-use. Maintenance of the National Cemetery would continue. The impacts on cultural resources and historic properties from vacating the VA Hot Springs campus would be the same as described for Alternative A.

4.3.4.2 Impacts from Off-Campus Actions

The off-campus actions under Alternative B would involve new construction or redevelopment/ renovation of facilities in the Hot Springs area for a CBOC and 100-bed RRTP, and in the Rapid City area for an MSOC. VA BHHCS has not yet identified specific locations in either city. Although the construction footprints would not be the same in the Hot Springs and Rapid City areas because of the specific facilities proposed in each city, the difference would be too minimal to identify a substantial difference between the cities in the potential for impacts to archaeological sites or historic buildings. Thus, the likelihood of encountering cultural resources or affecting historic properties would be similar in both cities, in the absence of specific locations being identified. The process for selecting locations in the Hot Springs and Rapid City areas would be the same, and the types of effects to cultural resources and historic properties would be similar to the impacts described for Alternative A.

4.3.5 Alternative C

4.3.5.1 Impacts from On-Campus Actions

The on-campus actions under Alternative C would involve interior renovations and modifications to Building 12 and the domiciliary (Buildings 1 through 8 and 11) to continue partial operation of the VA Hot Springs campus as a medical facility for Veterans. This continuation would retain the character of the property's historic use, which would be beneficial to maintaining the integrity of the historic property. Accessibility standards could be met by modifications, which would require a significant amount of evaluation and study to ensure major character-defining features of the historical property are not destroyed in the process. If inconsistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (NPS 1995), they would be adverse effects. Visual, atmospheric, or audible elements of construction activities and equipment would not likely diminish the integrity of the property and would be removed after renovations are completed, so any effect would be temporary and not adverse.

Buildings unneeded for providing health care services would be vacated. VA BHHCS would continue to maintain and monitor the condition of vacant (shuttered) buildings and, as necessary, follow mothballing procedures as described for Alternative A. Transfer of the property out of federal ownership or control would not likely occur under Alternative C; however, leasing parts of the VA Hot Springs campus not needed by VA BHHCS could occur, with similar effects to the NHL as described for Supplemental Alternative G.

4.3.5.2 Impacts from Off-Campus Actions

The off-campus actions under Alternative C would involve new construction or redevelopment/ renovation of existing facilities in the Rapid City area for an MSOC; however, VA BHHCS has not yet identified a specific location. The potential effects of development to cultural resources and historic properties in the Rapid City area would be the same as described for Alternative A.

There would be a reduced potential for affecting archaeological sites or surrounding historic properties in the Hot Springs area because no development would occur outside the VA Hot Springs campus. There would be no effect to the historic setting of the Hot Springs Historic District, the Hot Springs/Battle Mountain traditional use area, or other historic properties in the Hot Springs area. Ground disturbance that might expose archaeological materials or burial remains would not occur.

4.3.6 Alternative D

4.3.6.1 Impacts from On-Campus Actions

The on-campus actions under Alternative D would involve relocating health care services to other locations and vacating the VA Hot Springs campus including the Battle Mountain Sanitarium NHL. However, VA BHHCS would continue to maintain the campus pending transition to a future re-use. Maintenance of the National Cemetery would continue. The impacts on cultural resources and historic properties from vacating the VA Hot Springs campus would be the same as described for Alternative A.

4.3.6.2 Impacts from Off-Campus Actions

The off-campus actions under Alternative D would involve new construction or redevelopment/ renovation of facilities in the Hot Springs area for a CBOC and 24-bed RRTP, and in the Rapid City area for an MSOC and 76-bed RRTP. VA BHHCS has not yet identified specific locations in either city. Although the construction footprints would not be the same in the Hot Springs and Rapid City areas because of the specific facilities proposed in each city, the difference would be too minimal to identify a substantial difference between the cities in the potential for impacts to archaeological sites or historic buildings. Thus, the likelihood of encountering cultural resources or affecting historic properties would be similar in both cities, in the absence of specific locations being identified. The process for selecting locations would be the same, and the types of effects to cultural resources and historic properties would be similar to the impacts described for Alternative A.

4.3.7 Alternative E

4.3.7.1 Impacts from On-Campus Actions

The on-campus actions under Alternative E would involve interior and exterior renovations and modifications to numerous buildings to expand health care operations and address accessibility and barrier-free standards, and new construction of buildings to accommodate additional RRTP beds and housing, as described in Section 2.3.5. The VA Hot Springs campus, including the NHL, would continue to operate as a medical facility for Veterans. This continuation would retain the character of the property's historic use, which would be beneficial to maintaining the integrity of the historic property.

The impacts of retaining and expanding health care operations on the VA Hot Springs campus would be similar to the impacts described for Alternative C but would be more intense. Exterior renovations for accessibility, an additional floor to Building 12, and loss of open space to accommodate more RRTP beds and housing would alter the historic property, change physical features of the historic setting, and introduce visual elements that could diminish the integrity of the significant historic features. If inconsistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (NPS 1995), these would be adverse effects.

Visual, atmospheric, or audible elements of construction activities and equipment would not likely diminish the integrity of the property and would be removed after construction is completed, so any effect would be temporary and not adverse. Ground-disturbing activities could encounter archaeological and cultural materials that could be impacted by physical damage or removal from their historic location. These could be permanent adverse effects. However, mitigation and minimization measures identified in Chapter 5 would resolve adverse effects to archaeological resources.

New construction for additional RRTP beds and housing near the domiciliary or staff quarters could affect the integrity of the historic setting, feeling, and association of the property. Construction could indirectly adversely affect the Hot Springs Historic District or Hot Springs/Battle Mountain traditional use area if it creates a substantial contrast that diminishes the integrity of their significant historic features.

4.3.7.2 Impacts from Off-Campus Actions

The off-campus actions under Alternative E would be the continuation of health care operations at the leased CBOC in Rapid City. If space is leased in a different location for a CBOC upon the expiration of the current lease, the process for selecting the location and the types of effects to cultural resources and historic properties would be similar to those described for Alternative A as it relates to Rapid City.

4.3.8 Alternative F

4.3.8.1 Impacts from On-Campus Actions

The on-campus actions under Alternative F would involve continued management and operation of the VA Hot Springs campus as a medical facility for Veterans. This continuation would retain the character of the property's historic use, which would be beneficial to maintaining the integrity of the historic property. Upgrades and renovations to buildings to maintain clinical standards would be initiated as funding became available. The effects to the property would be similar to the impacts described for Alternative C.

4.3.8.2 Impacts from Off-Campus Actions

The off-campus actions under Alternative F would be the continuation of operations at the leased CBOC in Rapid City. If space is leased in a different location for a CBOC upon the expiration of the current lease, the process for selecting the location and the types of effects to cultural resources and historic properties would be similar to those described for Alternative A as it relates to Rapid City.

4.3.9 Supplemental Alternative G

4.3.9.1 Impacts from On-Campus Actions

The on-campus actions under Supplemental Alternative G would involve relocating health care services to other locations and vacating the VA Hot Springs campus including the Battle Mountain Sanitarium NHL. VA BHHCS would continue to maintain the campus pending transition to a future re-use. Maintenance of the National Cemetery would continue. The potential for effects to cultural resources and historic properties would depend on the selected re-use, but impacts would likely be similar to those described for Alternatives C and E.

Re-use of the VA Hot Springs campus could result in the transfer of ownership or change of occupant. If long-term preservation of the historic property is not legally ensured, an adverse effect could result; however, mitigation and minimization measures (see Chapter 5) committed to by VA BHHCS could resolve such effects. Further, any entity taking over use or possession that may involve change(s) to the facility would be required to comply with all mitigation, minimization, monitoring, and best practices identified in the ROD if VA BHHCS determines it will implement Supplemental Alternative G.

Alterations, modifications, or other activities to support re-use could affect the integrity of the historic properties. The historic setting, feeling, and association of the NHL, Hot Springs Historic District, and the Hot Springs/Battle Mountain traditional use area could be affected. Ground

disturbance could affect archaeological or cultural materials (prehistoric and historic) on the property. However, mitigation and minimization measures identified in Chapter 5 could resolve adverse effects to archaeological resources. These actions could have adverse effects on the property and NHL if inconsistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (NPS 1995).

The re-use and continued occupancy of the campus could have beneficial effects. Occupancy of the campus by an entity other than VA BHHCS would avoid having to shutter or mothball the buildings for an extended period.

4.3.9.2 Impacts from Off-Campus Actions

There are no off-campus actions specific to Supplemental Alternative G.

4.4 Geology and Soils

4.4.1 Evaluation Criteria

The potential effects related to geology and soils were evaluated through a qualitative assessment of geologic hazards and the potential for severe erosion or liquefaction, including both construction- and operation-related activities. An alternative would be considered to result in an adverse impact related to geology and soils if it would result in any of the following effects:

- expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, or seismic-related ground failure, including liquefaction or landslides
- be located on a geologic unit or soil that is unstable or would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse
- be located on expansive soil creating substantial risks to life or property

4.4.2 Alternative A

4.4.2.1 Impacts from Construction

Under Alternative A, construction activities would include site grading and preparation, which would disturb exposed subsurface soils. Approximately 5 acres could be disturbed in Hot Springs and approximately 17 acres could be disturbed in Rapid City. Locations for the proposed facilities have not yet been selected. Exposed soils would be susceptible to erosion from wind and stormwater runoff from the construction sites. Cut and fill actions in areas of severe sloping would be limited to those necessary to reduce erosion potential. Soils generated during excavation would be reutilized in areas requiring fill material or transported offsite. Site topography is not anticipated to be substantially altered. Drainage changes resulting from changes to site topography are anticipated to be minimal and would be monitored for erosion potential through routine site stormwater management practices. Wind erosion could temporarily increase airborne particulate matter in the area, resulting in short-term health, visibility, and aesthetics impacts. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

Development of a new facility location could impact prime, unique, statewide, or local important farmlands protected by the *Farmland Protection Policy Act*. Upon identification of a site for new construction, a Farmland Conversion Impact Rating form (Form AD-1006) would be completed by VA and submitted to the local National Resources Conservation Service office for a determination of whether the site contains prime, unique, statewide, or local important farmland and the level of impacts.

A general stormwater permit from the SDDENR would be required because the construction activities would disturb one or more acres of land. Development of a Stormwater Pollution Prevention Plan is required, consistent with the National Pollutant Discharge Elimination System (NPDES) general permit.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts would be minimized through implementation of construction best management practices and conformance with NPDES permit requirements. These minimization opportunities are described in Chapter 5.

4.4.2.2 Impacts from Operation

Operation of the proposed new facilities is not expected to result in adverse impacts to geology and soils. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and the resulting erosion potential.

4.4.3 Alternative B

4.4.3.1 Impacts from Construction

Under Alternative B, construction activities would include site grading and preparation, which would disturb exposed subsurface soils. Approximately 15 acres could be disturbed in Hot Springs and approximately 10 acres could be disturbed in Rapid City. Locations for the potential facilities have not yet been selected. The potential impacts from construction and regulatory compliance requirements would be the same as those described for Alternative A as adjusted for the differences in affected acreage.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts would be minimized through implementation of construction best management practices and conformance with NPDES permit requirements, as described in Chapter 5.

4.4.3.2 Impacts from Operation

Operation of the potential facilities is not expected to result in adverse impacts to geology and soils. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and the resulting erosion potential.

4.4.4 Alternative C

4.4.4.1 Impacts from Construction

Under Alternative C, construction activities would include site grading and preparation, which would disturb exposed subsurface soils. Soil disturbance from building renovation activities would be minimal. Approximately 10 acres could be disturbed in Rapid City. The potential impacts from construction and regulatory compliance requirements are the same as those described for Alternative A as adjusted for the differences in affected acreage and limited to Rapid City only under Alternative C.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts would be minimized through implementation of construction best management practices and conformance with NPDES permit requirements, as described in Chapter 5.

4.4.4.2 Impacts from Operation

Operation of the facilities is not expected to result in adverse impacts to geology and soils. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and the resulting erosion potential.

4.4.5 Alternative D

4.4.5.1 Impacts from Construction

Under Alternative D, construction activities would include site grading and preparation, which would disturb exposed subsurface soils. Approximately 13 acres could be disturbed in Hot Springs and approximately 17 acres could be disturbed in Rapid City. The potential impacts from construction and regulatory compliance requirements are the same as those described for Alternative A as adjusted for the differences in affected acreage.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts would be minimized through implementation of construction best management practices and conformance with NPDES permit requirements, as described in Chapter 5.

4.4.5.2 Impacts from Operation

Operation of the potential facilities is not expected to result in adverse impacts to geology and soils. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and the resulting erosion potential.

4.4.6 Alternative E

4.4.6.1 Impacts from Construction

Under Alternative E, construction activities associated with the renovation of existing facilities at the Hot Springs VAMC would occur. Approximately two acres or less could be disturbed due to new construction on the campus. Soil disturbance from building renovation activities would be minimal. Exposed soils would be susceptible to erosion from wind and stormwater runoff from the construction site. Soils generated during excavation would be reutilized in areas requiring fill material or transported offsite. Site topography is not anticipated to be substantially altered. Drainage changes resulting from changes to site topography are anticipated to be minimal and would be monitored for erosion potential through routine site stormwater management practices. Wind erosion could temporarily increase airborne particulate matter in the area, resulting in short-term health, visibility, and aesthetics impacts. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

Depending on the size of the campus location(s) selected for the additional RRTP facility and any new housing, a general stormwater permit from the SDDENR could be required if the construction activities would disturb one or more acres of land. Development of a Stormwater Pollution Prevention Plan would also be required, consistent with the NPDES general permit.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts would be minimized through implementation of construction best management practices, as described in Chapter 5.

4.4.6.2 Impacts from Operation

Operation of the potential facilities is not expected to result in adverse impacts to geology and soils. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and the resulting erosion potential.

4.4.7 Alternative F

4.4.7.1 Impacts from Construction

Under Alternative F, only renovation of existing facilities at the Hot Springs VAMC provided for in annual budgets would occur. Soil disturbance from building renovation activities would be minimal. Exposed soils would be susceptible to erosion from wind and stormwater runoff from the construction site. Wind erosion could temporarily increase airborne particulate matter in the area, resulting in short-term health, visibility, and aesthetics impacts. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

Construction-related impacts, if any, would be minor and short-term. Erosion and sedimentation impacts would be minimized through implementation of construction best management practices, as described in Chapter 5.

4.4.7.2 Impacts from Operation

Continued operation of the facilities is not expected to result in adverse impacts to geology and soils. Landscape vegetation would be maintained, thereby minimizing exposed soils and the resulting erosion potential.

4.4.8 Supplemental Alternative G

4.4.8.1 Impacts from Construction

Under Supplemental Alternative G, depending on the intended use, some facility renovation may be required, but construction of facilities would not be expected to exceed that described for Alternative E. The potential impacts from construction and regulatory compliance requirements would be similar to those of Alternative E if there was a small amount of construction or Alternative F if there was none.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts would be minimized through implementation of construction best management practices, as described in Chapter 5.

4.4.8.2 Impacts from Operation

Operation of some or all of the Hot Springs VAMC facilities by a new tenant is not expected to result in adverse impacts to geology and soils. For construction of any new building, landscape vegetation would be maintained, thereby minimizing exposed soils and the resulting erosion potential.

4.5 Hydrology and Water Quality

4.5.1 Evaluation Criteria

The potential effects related to hydrology and water quality were evaluated through a qualitative assessment of potential project-related drainage alterations, increased impervious areas, water quality degradation, or groundwater depletion, including both construction- and operation-related activities. An alternative would be considered to result in an adverse impact related to hydrology and water quality if it would result in any of the following effects:

- violate existing water quality standards or otherwise substantially degrade water quality
- result in substantial water quality changes that would adversely affect beneficial uses
- result in substantive groundwater depletion

4.5.2 Alternative A

4.5.2.1 Impacts from Construction

Under Alternative A, construction activities would include site grading and preparation, which would disturb exposed subsurface soils. Approximately 5 acres could be disturbed in Hot Springs and approximately 17 acres could be disturbed in Rapid City. Locations for the new facilities have not yet been selected. Exposed soils would be susceptible to erosion from stormwater runoff from the construction sites. Drainage changes resulting from changes to site topography and installation of impervious surfaces are anticipated to be minimal and would be monitored for erosion potential through routine site stormwater management practices. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

A general stormwater permit from the SDDENR must be obtained because the construction activities would disturb one or more acres of land. Development of a Stormwater Pollution Prevention Plan is required, consistent with the NPDES general permit.

The use of construction materials and generation of construction wastes could increase the potential for stormwater contamination that could adversely affect water quality. Additionally, spills or leaks from construction equipment could adversely affect water quality if allowed to enter surface waters.

Groundwater resources are not anticipated to be used nor measurably affected by construction activities.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts and the potential for equipment spills or leaks would be minimized through implementation of construction best management practices and conformance with NPDES permit requirements, as described in Chapter 5.

4.5.2.2 Impacts from Operation

Operation of the proposed new facilities is not expected to result in adverse impacts to hydrology and water quality. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and impervious surface areas. Wastewater generated by facility operations would be treated by the municipal wastewater treatment plant in either city of operation.

4.5.3 Alternative B

4.5.3.1 Impacts from Construction

Under Alternative B, construction activities would include site grading and preparation, which would disturb exposed subsurface soils. Approximately 15 acres could be disturbed in Hot Springs and approximately 10 acres could be disturbed in Rapid City. Locations for the new facilities have not yet been selected. The potential impacts from construction and regulatory compliance requirements are the same as those described for Alternative A as adjusted for the differences in affected acreage.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts and the potential for equipment spills or leaks would be minimized through implementation of construction best management practices and conformance with NPDES permit requirements, as described in Chapter 5.

4.5.3.2 Impacts from Operation

Operation of the new facilities is not expected to result in adverse impacts to hydrology and water quality. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and impervious surface areas. Wastewater generated by facility operations would be treated by the municipal wastewater treatment plant in either city of operation.

4.5.4 Alternative C

4.5.4.1 Impacts from Construction

Under Alternative C, construction activities would include site grading and preparation, which would disturb exposed subsurface soils. Soil disturbance from building renovation activities would be minimal. Approximately 10 acres could be disturbed in Rapid City. A location for the potential new facility in Rapid City has not yet been selected. The potential impacts from construction and regulatory compliance requirements are the same as those described for Alternative A as adjusted for the differences in affected acreage and limited to Rapid City only under Alternative C.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts and the potential for equipment spills or leaks would be minimized through implementation of construction best management practices and conformance with NPDES permit requirements, as described in Chapter 5.

4.5.4.2 Impacts from Operation

Operation of the facilities is not expected to result in adverse impacts to hydrology and water quality. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and impervious surface areas. Wastewater generated by facility operations would be treated by the municipal wastewater treatment plant in either city of operation.

4.5.5 Alternative D

4.5.5.1 Impacts from Construction

Under Alternative D, construction activities would include site grading and preparation, which would disturb exposed subsurface soils. Approximately 13 acres could be disturbed in Hot Springs and approximately 17 acres could be disturbed in Rapid City. Locations for the potential new facilities have not yet been selected. The potential impacts from construction and regulatory compliance requirements are the same as those described for Alternative A as adjusted for the differences in affected acreage.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts and the potential for equipment spills or leaks would be minimized through implementation of construction best management practices and conformance with NPDES permit requirements as described in Section 5.5.

4.5.5.2 Impacts from Operation

Operation of the new facilities is not expected to result in adverse impacts to hydrology and water quality. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and impervious surface areas. Wastewater generated by facility operations would be treated by the municipal wastewater treatment plant in either city of operation.

4.5.6 Alternative E

4.5.6.1 Impacts from Construction

Under Alternative E, construction activities associated with the renovation of existing facilities at the Hot Springs VAMC would occur. Approximately two acres or less could be disturbed due to new construction on the campus. Soil disturbance from building renovation activities would be minimal. Exposed soils would be susceptible to erosion from stormwater runoff from the construction site. Site topography is not anticipated to be substantially altered. Drainage changes resulting from changes to site topography are anticipated to be minimal and would be monitored for erosion potential through routine site stormwater management practices. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

The use of construction materials and generation of construction wastes could increase the potential for stormwater contamination that could adversely affect water quality. Additionally, spills or leaks from construction equipment could adversely affect water quality if allowed to enter surface waters. However, these potential impacts would likely be less than potential impacts from the new facility construction activities of Alternatives A, B, and D.

Depending on the size of the campus location(s) selected for the additional RRTP facility and any new housing, a general stormwater permit from the SDDENR could be required if the construction activities would disturb one or more acres of land. Development of a Stormwater Pollution Prevention Plan would also be required, consistent with the NPDES general permit.

Groundwater resources are not anticipated to be used nor measurably affected by renovation activities.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts and the potential for equipment spills or leaks would be minimized through implementation of construction best management practices, as described in Chapter 5.

4.5.6.2 Impacts from Operation

Operation of the facilities is not expected to result in adverse impacts to hydrology and water quality. Landscape vegetation would be installed and maintained, thereby minimizing exposed soils and impervious surface areas. Wastewater generated by facility operations would be treated by the municipal wastewater treatment plant in either city of operation.

4.5.7 Alternative F

4.5.7.1 Impacts from Construction

Under Alternative F, only renovation of existing facilities at the Hot Springs VAMC provided for in annual budgets would occur. Soil disturbance from building renovation activities would be minimal. Exposed soils would be susceptible to erosion from stormwater runoff from the construction site. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

The use of construction materials and generation of construction wastes could increase the potential for stormwater contamination that could adversely affect water quality. Additionally, spills or leaks from construction equipment could adversely affect water quality if allowed to enter surface waters. However, these potential impacts would be less than potential impacts from the renovation or new facility construction activities of Alternatives A through E.

Groundwater resources would not be affected by renovation activities.

Construction-related impacts, if any, would be minor and short-term. Erosion and sedimentation impacts and the potential for equipment spills or leaks would be minimized through implementation of construction best management practices, as described in Chapter 5.

4.5.7.2 Impacts from Operation

Continued operation of the facilities is not expected to result in adverse impacts to hydrology and water quality. Landscape vegetation would be maintained, thereby minimizing exposed soils and impervious surface areas. Wastewater generated by facility operations would be treated by the municipal wastewater treatment plant in each city of operation.

4.5.8 Supplemental Alternative G

4.5.8.1 Impacts from Construction

Under Supplemental Alternative G, depending on the intended use, some facility renovation may be required, but construction of facilities would not be expected to exceed that described for Alternative E. The potential impacts from construction and regulatory compliance requirements would be similar to those of Alternative E if there was a small amount of construction or Alternative F if there was none.

Construction-related impacts would be minor and short-term. Erosion and sedimentation impacts and the potential for equipment spills or leaks would be minimized through implementation of construction best management practices, as described in Chapter 5.

4.5.8.2 Impacts from Operation

Operation of the VA Hot Springs campus facilities by a new tenant is not expected to result in adverse impacts to hydrology and water quality. For construction of any new building, landscape vegetation would be installed and maintained, thereby minimizing exposed soils and impervious surface areas. Wastewater generated by facility operations would be treated by the Hot Springs municipal wastewater treatment plant.

4.6 Wildlife and Habitat

4.6.1 Evaluation Criteria

Impacts on biological resources are based on (1) the legal, commercial, recreational, ecological, or scientific importance of the resource; (2) the proportion of the resource that would be affected relative to its occurrence in the region; (3) the sensitivity of the resource to the proposed activities; and (4) the duration of ecological effects. An adverse impact on a biological resource would be identified in the case of a violation of the laws and regulations pertaining to biological resources, if species or habitats of high concern are adversely affected over relatively large areas, or if disturbances cause reductions in population size or distribution of a species of special concern. A habitat perspective is used to provide a framework for analysis of general classes of effects such as those caused by due to removal of critical habitat, noise, or human disturbance.

New sites have not yet been selected for a proposed CBOC, RRTP, and MSOC in Hot Springs or Rapid City. For purposes of bounding the impact analysis, it is assumed that the alternatives would involve new construction on a previously undisturbed site. Ground disturbance and noise associated with construction might directly or indirectly cause potential effects on wildlife and habitat. Direct effects from ground disturbance were evaluated by identifying the types of potential ground-disturbing activities and area affected in comparison to the extent of existing resources. Mortality of individuals, habitat removal, and damage or degradation of habitats are impacts that might be associated with ground-disturbing activities. By itself, noise associated with these alternatives is not likely to be of sufficient magnitude to result in the direct loss of individuals or reduce reproductive output. Effects assessment considered the number of individuals or protected species involved, amount of habitat affected, relationship of the area of potential effect to total available habitat within the region, type of stressors involved, and magnitude of the effects.

To evaluate effects to biological resources, the alternatives are reviewed with respect to the following criteria to determine whether any activities have the potential to directly or indirectly result in the following:

- Cause displacement of terrestrial or aquatic communities or loss of habitat
- Diminish the value of habitat for wildlife or plants
- Interfere with the movement of native resident or migratory wildlife species
- Conflict with applicable management plans for terrestrial, avian and aquatic species and their habitat
- Cause the introduction of noxious or invasive plant species
- Diminish the value of habitat for fish species;
- Cause a decline in native fish populations
- Affect or displace endangered, threatened, or other special status species
- Cause encroachment on or affect designated critical habitat of a federally listed species

4.6.2 Alternative A

4.6.3.1 Impacts from Construction

Under Alternative A, construction activities would include site grading and preparation, which would clear existing vegetation and habitat. Siting the new CBOC in Hot Springs would disturb up to approximately 5 acres of land, and siting the new MSOC and RRTP in Rapid City would disturb up to approximately 17 acres of land if a greenfield site is selected.

Locations for the new facilities have not yet been selected; therefore, site-specific impacts on habitat and wildlife species within or adjacent to individual sites cannot be evaluated on a site-specific basis in this EIS. However, given the relatively small affected areas within each city in relation to available wildlife habitat in the area, habitat disturbance is expected to be minimal. In addition, VA's site selection process would include reviewing potential locations for the presence of sensitive ecological resources and protected species and a preference to avoid such locations.

Animal species that are adapted to more urban areas, such as small mammals (mice, rabbits, ground squirrels), birds, and reptiles would be affected at any site located within the city limits. Some of the less mobile species within the construction zone could perish during land-clearing activities and from increased vehicular traffic during construction and operation. Activities and noise associated with construction could cause larger mammals and birds to relocate to similar habitat in the area. Depending on the populations present in those areas, the ecosystem dynamics could be altered, adding stress if food or shelter were limited. Prior to construction, the proposed site would be surveyed for nests of migratory birds in accordance with the *Migratory Bird Treaty Act*. Construction impacts related to the presence of heavy equipment and related noise would be short-term, concentrated in the first year of an estimated two-year construction schedule for each new facility. To the extent that some of the building components may be constructed elsewhere, an offsite construction process has an advantage of reducing construction time and decreasing site disruption.

With respect to impacts on potential greenfield sites, VA would make efforts to preserve existing natural features and significant vegetation and avoid impacts to sensitive resources as part of the site selection process, consistent with VA siting guidelines (VA 2013), including:

- Preserve and conserve natural features and significant vegetation, especially trees and shrubs (including sensitive habitat), for environmental protection (reduce maintenance and enhance sustainability).
- Preserve existing trees, forests, wetlands and landscape features that are important resources and visual assets; site analysis and planting design shall identify, retain and protect mature trees and vegetation, whenever reasonably possible.
- Minimize site disturbance and modification to natural topography.
- Concentrate development in areas with minimal non-engineered slopes and existing infrastructure.
- Mitigate any construction disturbance.
- Minimize creation of impervious surfaces.
- Maximize use of existing drainage patterns and features.

- Use required buffers/setbacks to restrict use of the area if any wetlands or protected waterways are on the site; all wetlands and waterways on federal lands must be identified and protected throughout the site design and construction process and after the project is finished.

Although site clearing would destroy individual plants and would kill or displace individual animals (particularly small mammals and songbirds with limited home ranges), no adverse effects to these species are expected from implementing any of the alternatives because non-sensitive species impacts are assessed on a regional population-level basis.

Aquatic resources may be indirectly affected through increased runoff or water and soil to surface waters from construction sites. Additionally, incidental spills or leaks from construction equipment could adversely affect water quality and aquatic resources if they enter surface waters. However, implementation of best management practices and conformance with NPDES permit requirements would help minimize impacts on water quality and thus aquatic resources; these minimization opportunities are described in Chapter 5. Therefore, the impacts to aquatic ecosystem are expected to be minimal.

Protected Species and Habitats

Table 3.6-2 in Section 3.6 lists the federally and state-protected endangered and threatened species occurring or potentially occurring within the Fall River and Pennington Counties. If a site was selected on which construction and operation of a proposed facility could disturb, displace, injure, or kill a protected species, a site-specific analyses and consultation with the U.S. Fish and Wildlife Service (FWS) and South Dakota Department of Fish and Game (SDDFG) would be required before the project is implemented. That analysis would take into account specific locations for the facilities in relation to the location of sensitive habitats and sensitive species at or near the site, particularly species listed by the FWS or state as endangered or threatened.

For those sites that may contain sensitive habitats or protected wildlife, the degree to which these habitats and wildlife may be affected by noise or vibration disturbance, human presence, vehicle or equipment emissions, runoff, or encroachment by nearby construction activities depends on the likelihood such species or habitat are present and VA's ability to avoid siting near sensitive habitats and protected wildlife species. The occurrence of sensitive habitats and wildlife within Hot Springs and Rapid City area varies by location, with low to no occurrence in the developed city centers and slightly higher occurrence in adjacent rural areas, particularly in the adjoining Black Hills area.

The potential for site clearing and excavation to affect nearby sensitive habitats, including wetlands and designated critical habitats of federally and state-listed endangered and threatened species, was assumed to be proportional to facility acreage requirements. Considering the relatively small land requirements for the proposed facilities, compared to many federal and commercial development projects, it is expected that VA would have a great degree of flexibility in selecting a suitable site that would allow minimal impact to wildlife and habitat. VA follows siting guidelines that emphasize preservation (through avoidance) of sensitive habitats and special status vegetation and species, as listed above.

Pre-construction surveys and coordination/consultation with FWS and SDDFG would be conducted, as appropriate, to ensure that impacts on any sensitive animal and plant species in the

vicinity of the selected site are negligible and that appropriate mitigation and minimization actions are implemented. Mitigation measures could include site development plans that avoid disturbing species or habitat, timing activities to avoid critical timeframes such as breeding season, or relocating sensitive species away from areas likely to be disturbed. Appropriate mitigations would be coordinated with the regulatory agencies as part of the consultation process. As needed, site-specific NEPA analysis tiered to this EIS would evaluate the extent and severity of impacts from developing sites or undertaking actions that are not within the bounds of the analysis in this EIS.

4.6.2.2 Impacts from Operation

Operation of the new facilities could impact wildlife in the area due to human presence. Facility emissions would be minimal and would comply with all applicable regulations and permitting procedures. No point-source discharges to surface water are anticipated from routine operation of the facilities proposed under Alternative A. Depending on the site, there could be a potential for stormwater runoff to enter aquatic habitat. However, the mitigation and minimization measures described in Chapter 5 would ensure impacts are minimized. Therefore, the impacts to aquatic ecosystems are expected to be minimal.

The municipal water system would provide the water requirements for the proposed Hot Springs and Rapid City facilities. No need to withdraw water from surface water sources is anticipated; thus, surface water volumes would not be affected and would continue to adequately support the existing aquatic ecosystem.

Operational impacts on sensitive habitats would be unlikely because any airborne and aqueous effluents would be controlled and permitted. Because species and habitat presence would be considered during site selection, it is unlikely that any federally or state-listed threatened or endangered species would be affected by facility operations.

4.6.3 Alternative B

4.6.3.1 Impacts from Construction

Under Alternative B, construction would include site grading and preparation, which would disturb existing vegetation and habitat. Up to approximately 15 acres could be disturbed in Hot Springs and up to approximately 10 acres could be disturbed in Rapid City. Locations for the new facilities have not yet been selected.

Impacts from construction under Alternative B would be very similar to those under Alternative A, since similar facilities would be constructed and the same conditions would apply. The land requirements would be slightly different under Alternative B, potentially disturbing a slightly larger area in Hot Springs (15 acres versus 5 acres under Alternative A) and a slightly smaller area in Rapid City (10 acres versus 17 acres under Alternative A). However, overall impacts from construction under Alternative B are expected to be minimal.

Locations for the new facilities have not yet been selected, therefore site-specific impacts on terrestrial and aquatic habitats and wildlife within or adjacent to individual sites cannot be evaluated in this EIS, and would be addressed in additional NEPA analysis as needed. However, given the relatively small potentially affected areas within each city in relation to available wildlife habitat in the

area, and VA's site selection process that would avoid sites that have or are near protected species or sensitive habitat, habitat disturbance is expected to be minimal.

Considering the relatively small land requirements for new facilities under the alternatives and the small amount of sensitive habitat within the city limits of Hot Springs and Rapid City, it is expected that VA would have a great degree of flexibility in selecting a suitable site that would have minimal impact on sensitive habitat and wildlife. Appropriate mitigation measures (see Chapter 5) and coordination/consultation with FWS and SDDFG would ensure that site clearing to implement any alternative would not affect protected species or their habitat.

4.6.3.2 Impacts from Operation

The proposed facilities under Alternative B are not significantly different from those under Alternative A. Therefore, impacts from Alternative B from facility operation in Hot Springs and Rapid City would be similar to those from Alternative A. Operation of the facilities is not expected to result in adverse impacts to existing ecological resources including vegetation, habitat, and wildlife.

4.6.4 Alternative C

4.6.4.1 Impacts from Construction

Under Alternative C, construction activities would include site grading and preparation, which would disturb existing vegetation and habitat. Vegetation and habitat disturbance from building renovation activities at the existing Hot Springs VAMC would be minimal since most activities would occur within existing buildings. Approximately 10 acres could be disturbed in Rapid City for construction of an MSOC. A location for this new facility has not yet been selected; however, impacts would be identical to those in Rapid City under Alternative B, which would also affect up to 10 acres of land. Overall impacts from construction under Alternative B are expected to be minimal.

4.6.4.2 Impacts from Operation

The size of the proposed new facility in Rapid City under Alternative C is identical to that proposed in Rapid City under Alternative B. Therefore, impacts are expected to be the same. Activities proposed at the existing Hot Springs VAMC would not disturb any new land. Operation of the proposed facilities under Alternative C is not expected to result in adverse impacts to existing ecological resources including vegetation and habitat and wildlife.

4.6.5 Alternative D

4.6.5.1 Impacts from Construction

Under Alternative D, construction activities would include site grading and preparation, which would disturb existing vegetation and habitat. Up to approximately 13 acres could be disturbed in Hot Springs and up to approximately 17 acres could be disturbed in Rapid City.

Locations for the new facilities have not yet been selected; however, impacts occurring in Hot Springs would be somewhat less than but similar to those under Alternative B (where up to 15 acres would be affected), and impacts occurring in Rapid City would be similar to those under Alternative A.

4.6.5.2 Impacts from Operation

The sizes of the proposed new facilities in Hot Springs and Rapid City under Alternative D are not significantly different from those proposed under Alternatives A and B. Therefore, impacts from Alternative B from facility operation in Hot Springs and Rapid City would be similar to those from Alternatives A and B. Operation of the facilities is not expected to result in adverse impacts to existing ecological resources including vegetation and habitat and wildlife.

4.6.6 Alternative E

4.6.6.1 Impacts from Construction

Under Alternative E, construction activities would include the renovation of existing facilities and minor onsite new construction in previously disturbed areas on the VA Hot Springs campus. There would be no change in location or operation of the existing CBOC in Rapid City. The majority of renovation work in Hot Springs would be confined to building interiors and disturbance to existing vegetation and habitat from building renovation activities would be minimal, affecting less than two acres. There would be negligible potential for adverse impact to existing vegetation and wildlife at the VA facilities in Hot Springs or Rapid City under Alternative E.

4.6.6.2 Impacts from Operation

Continued operation of the existing facilities, even with some new facility uses and limited new construction at the Hot Springs VAMC, is not expected to result in adverse impacts to ecological resources including vegetation, habitat, and wildlife.

4.6.7 Alternative F

4.6.7.1 Impacts from Construction

Under Alternative F, there would be no (or limited) exterior construction. Ground disturbance would be minimal and there would be no appreciable change in existing habitat and wildlife conditions. This alternative would have no adverse impact on ecological resources, including terrestrial and aquatic resources or sensitive habitats and species.

4.6.7.2 Impacts from Operation

Continued operation of the existing facilities in Hot Springs and Rapid City under Alternative F is not expected to result in adverse impacts to existing ecological resources including vegetation, habitat, and wildlife.

4.6.8 Supplemental Alternative G

4.6.8.1 Impacts from Construction

Under Alternative G, some of the existing facilities in Hot Springs would be re-used by other tenants. Depending on the intended use, some facility renovation and small construction (as in Alternative E) may be required; the majority of renovation activities are assumed to occur inside and ground disturbance would be minimal (two acres or less is assumed). Impacts on ecological resources would be minimal to none, similar to those of Alternatives E and F.

4.6.8.2 Impacts from Operation

Operations from re-use of some or all of the VA Hot Springs campus by a tenant are not expected to result in adverse impacts to ecological resources, including habitat and wildlife; activities and impacts are estimated to be bounded by those projected for Alternatives E and F, depending on the intensity of onsite activity.

4.7 Noise

To assess the potential short-term noise impacts from construction, sensitive receptors and their relative levels of exposure were identified. Construction noise generated by the proposed projects was predicted using the Roadway Construction Noise Model (FHWA 2006). Noise levels of specific construction equipment and resultant noise levels at representative locations were calculated.

Ground-borne vibration impacts from construction activities were assessed based on existing documentation (such as for vibration levels produced by specific construction equipment operations) and the distance of sensitive receptors from the given source. Vibration levels were predicted, and impacts were evaluated against the established thresholds.

Two primary groups of noise-generating activities were identified: construction and renovation. For each activity group, noise levels were predicted using the Roadway Construction Noise Model (FHWA 2006). Default values for equipment specification sound levels and usage factors were used in modeling predicted noise levels. It was assumed that all equipment is in use simultaneously (conservative assumption overestimating predicted noise levels) and the construction site is surrounded by a noise barrier with some gaps (providing an estimated noise shielding of five A-weighted decibels [dBA]). Outdoor noise levels were predicted at distances from the source equipment of 100 feet and 500 feet. Figures 4.7-1 through 4.7-6 provide the model results.

For the construction activities group, the following pieces of equipment were assumed to potentially be in use:

- Backhoe
- Compactor (ground)
- Compressor (air)
- Concrete mixer truck
- Concrete pump truck
- Concrete saw
- Crane
- Dozer
- Dump truck
- Excavator
- Flat bed truck
- Front end loader
- Generator
- Grader
- Man lift
- Pickup truck
- Pneumatic tools
- Pumps
- Scraper
- Warning horn

The resulting predicted equivalent continuous noise level (L_{eq}) for the construction activities group at a distance of 100 feet is 81.0 dBA and at a distance of 500 feet is 67.0 dBA.

For the renovation activities group, the following pieces of equipment were assumed to potentially be in use:

- Backhoe
- Compactor (ground)
- Compressor (air)
- Crane
- Dump truck
- Flat bed truck
- Front end loader
- Generator
- Man lift
- Pickup truck
- Pneumatic tools
- Pumps
- Warning horn

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/9/2015
Case Description: BHHCS EIS - Construction Activities

---- Receptor #1 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Hot Springs, SD @ 100 ft	Residential	50	40	35

Description	Impact Device	Usage (%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Backhoe	No	40	80		100	5
Compactor (ground)	No	20	80		100	5
Compressor (air)	No	40	80		100	5
Concrete Mixer Truck	No	40	85		100	5
Concrete Pump Truck	No	20	82		100	5
Concrete Saw	No	20	90		100	5
Crane	No	16	85		100	5
Dozer	No	40	85		100	5
Dump Truck	No	40	84		100	5
Excavator	No	40	85		100	5
Flat Bed Truck	No	40	84		100	5
Front End Loader	No	40	80		100	5
Generator	No	50	82		100	5
Grader	No	40	85		100	5
Man Lift	No	20	85		100	5
Pickup Truck	No	40	55		100	5
Pneumatic Tools	No	50	85		100	5
Pumps	No	50	77		100	5
Scraper	No	40	85		100	5
Warning Horn	No	5	85		100	5

Equipment	Results Calculated (dBA) *Lmax	Leq	Noise Limits (dBA) Day Lmax	Leq	Evening Lmax	Leq	Night Lmax	Leq	Noise Limit Exceedance (dBA) Day Lmax	Leq	Evening Lmax	Leq	Night Lmax	Leq
Backhoe	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compactor (ground)	69	62	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compressor (air)	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Mixer Truck	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Pump Truck	71	64	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Saw	79	72	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Crane	74	66	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dozer	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dump Truck	73	69	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Excavator	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Flat Bed Truck	73	69	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Front End Loader	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Generator	71	68	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Grader	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Man Lift	74	67	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pickup Truck	44	40	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pneumatic Tools	74	71	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pumps	66	63	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Scraper	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Warning Horn	74	61	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Total	79	81	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Note: dBA = A-weighted decibel. L_{eq} = equivalent continuous noise level. L_{max} = maximum noise level.

Figure 4.7-1. Hot Springs Construction Noise Estimates at 100 Feet from Source.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/9/2015
Case Description: BHHCS EIS - Construction Activities

---- Receptor #2 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Hot Springs, SD @ 500 ft	Residential	50	40	35

Description	Impact Device	Usage (%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Backhoe	No	40	80		500	5
Compactor (ground)	No	20	80		500	5
Compressor (air)	No	40	80		500	5
Concrete Mixer Truck	No	40	85		500	5
Concrete Pump Truck	No	20	82		500	5
Concrete Saw	No	20	90		500	5
Crane	No	16	85		500	5
Dozer	No	40	85		500	5
Dump Truck	No	40	84		500	5
Excavator	No	40	85		500	5
Flat Bed Truck	No	40	84		500	5
Front End Loader	No	40	80		500	5
Generator	No	50	82		500	5
Grader	No	40	85		500	5
Man Lift	No	20	85		500	5
Pickup Truck	No	40	55		500	5
Pneumatic Tools	No	50	85		500	5
Pumps	No	50	77		500	5
Scraper	No	40	85		500	5
Warning Horn	No	5	85		500	5

Equipment	Results Calculated (dBA) *Lmax	Leq	Noise Limits (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq	Noise Limit Exceedance (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq
Backhoe	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compactor (ground)	55	48	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compressor (air)	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Mixer Truck	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Pump Truck	57	50	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Saw	65	58	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Crane	60	52	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dozer	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dump Truck	59	55	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Excavator	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Flat Bed Truck	59	55	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Front End Loader	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Generator	57	54	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Grader	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Man Lift	60	53	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pickup Truck	30	26	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pneumatic Tools	60	57	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pumps	52	49	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Scraper	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Warning Horn	60	47	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Total	65	67	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Note: dBA = A-weighted decibel. L_{eq} = equivalent continuous noise level. L_{max} = maximum noise level.

Figure 4.7-2. Hot Springs Construction Noise Estimates at 500 Feet from Source.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/9/2015
Case Description: BHHCS EIS - Construction Activities

---- Receptor #3 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Rapid City, SD @ 100 ft	Residential	55	40	35

Description	Impact Device	Usage (%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Backhoe	No	40	80		100	5
Compactor (ground)	No	20	80		100	5
Compressor (air)	No	40	80		100	5
Concrete Mixer Truck	No	40	85		100	5
Concrete Pump Truck	No	20	82		100	5
Concrete Saw	No	20	90		100	5
Crane	No	16	85		100	5
Dozer	No	40	85		100	5
Dump Truck	No	40	84		100	5
Excavator	No	40	85		100	5
Flat Bed Truck	No	40	84		100	5
Front End Loader	No	40	80		100	5
Generator	No	50	82		100	5
Grader	No	40	85		100	5
Man Lift	No	20	85		100	5
Pickup Truck	No	40	55		100	5
Pneumatic Tools	No	50	85		100	5
Pumps	No	50	77		100	5
Scraper	No	40	85		100	5
Warning Horn	No	5	85		100	5

Equipment	Results Calculated (dBA) *Lmax	Leq	Noise Limits (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq	Noise Limit Exceedance (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq
Backhoe	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compactor (ground)	69	62	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compressor (air)	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Mixer Truck	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Pump Truck	71	64	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Saw	79	72	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Crane	74	66	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dozer	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dump Truck	73	69	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Excavator	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Flat Bed Truck	73	69	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Front End Loader	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Generator	71	68	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Grader	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Man Lift	74	67	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pickup Truck	44	40	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pneumatic Tools	74	71	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pumps	66	63	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Scraper	74	70	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Warning Horn	74	61	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Total	79	81	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Note: dBA = A-weighted decibel. L_{eq} = equivalent continuous noise level. L_{max} = maximum noise level.

Figure 4.7-3. Rapid City Construction Noise Estimates at 100 Feet from Source.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/9/2015
Case Description: BHHCS EIS - Construction Activities

---- Receptor #4 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Rapid City, SD @ 500 ft	Residential	55	40	35

Description	Impact Device	Usage (%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Backhoe	No	40	80		500	5
Compactor (ground)	No	20	80		500	5
Compressor (air)	No	40	80		500	5
Concrete Mixer Truck	No	40	85		500	5
Concrete Pump Truck	No	20	82		500	5
Concrete Saw	No	20	90		500	5
Crane	No	16	85		500	5
Dozer	No	40	85		500	5
Dump Truck	No	40	84		500	5
Excavator	No	40	85		500	5
Flat Bed Truck	No	40	84		500	5
Front End Loader	No	40	80		500	5
Generator	No	50	82		500	5
Grader	No	40	85		500	5
Man Lift	No	20	85		500	5
Pickup Truck	No	40	55		500	5
Pneumatic Tools	No	50	85		500	5
Pumps	No	50	77		500	5
Scraper	No	40	85		500	5
Warning Horn	No	5	85		500	5

Equipment	Results Calculated (dBA) *Lmax	Leq	Noise Limits (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq	Noise Limit Exceedance (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq
Backhoe	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compactor (ground)	55	48	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compressor (air)	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Mixer Truck	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Pump Truck	57	50	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Concrete Saw	65	58	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Crane	60	52	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dozer	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dump Truck	59	55	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Excavator	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Flat Bed Truck	59	55	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Front End Loader	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Generator	57	54	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Grader	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Man Lift	60	53	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pickup Truck	30	26	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pneumatic Tools	60	57	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pumps	52	49	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Scraper	60	56	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Warning Horn	60	47	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Total	65	67	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Note: dBA = A-weighted decibel. L_{eq} = equivalent continuous noise level. L_{max} = maximum noise level.

Figure 4.7-4. Rapid City Construction Noise Estimates at 500 Feet from Source.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/9/2015
Case Description: BHHCS EIS - Construction Activities

---- Receptor #1 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Hot Springs, SD @ 100 ft	Residential	50	40	35

Description	Impact Device	Usage (%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Backhoe	No	40	80		100	5
Compactor (ground)	No	20	80		100	5
Compressor (air)	No	40	80		100	5
Crane	No	16	85		100	5
Dump Truck	No	40	84		100	5
Flat Bed Truck	No	40	84		100	5
Front End Loader	No	40	80		100	5
Generator	No	50	82		100	5
Man Lift	No	20	85		100	5
Pickup Truck	No	40	55		100	5
Pneumatic Tools	No	50	85		100	5
Pumps	No	50	77		100	5
Warning Horn	No	5	85		100	5

Results

Equipment	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Noise Limits (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq	Noise Limit Exceedance (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq
Backhoe	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compactor (ground)	69	62	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compressor (air)	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Crane	74	66	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dump Truck	73	69	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Flat Bed Truck	73	69	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Front End Loader	69	65	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Generator	71	68	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Man Lift	74	67	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pickup Truck	44	40	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pneumatic Tools	74	71	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pumps	66	63	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Warning Horn	74	61	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Total	74	77.6	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Note: dBA = A-weighted decibel. L_{eq} = equivalent continuous noise level. L_{max} = maximum noise level.

Figure 4.7-5. Hot Springs Renovation Noise Estimates at 100 Feet from Source.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/9/2015
Case Description: BHHCS EIS - Construction Activities

---- Receptor #2 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Hot Springs, SD @ 500 ft	Residential	50	40	35

Description	Impact Device	Usage (%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Backhoe	No	40	80		500	5
Compactor (ground)	No	20	80		500	5
Compressor (air)	No	40	80		500	5
Crane	No	16	85		500	5
Dump Truck	No	40	84		500	5
Flat Bed Truck	No	40	84		500	5
Front End Loader	No	40	80		500	5
Generator	No	50	82		500	5
Man Lift	No	20	85		500	5
Pickup Truck	No	40	55		500	5
Pneumatic Tools	No	50	85		500	5
Pumps	No	50	77		500	5
Warning Horn	No	5	85		500	5

Equipment	Results Calculated (dBA) *Lmax	Leq	Noise Limits (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq	Noise Limit Exceedance (dBA) Day Lmax	Day Leq	Evening Lmax	Evening Leq	Night Lmax	Night Leq
Backhoe	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compactor (ground)	55	48	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Compressor (air)	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Crane	60	52	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Dump Truck	59	55	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Flat Bed Truck	59	55	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Front End Loader	55	51	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Generator	57	54	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Man Lift	60	53	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pickup Truck	30	26	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pneumatic Tools	60	57	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Pumps	52	49	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Warning Horn	60	47	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A
Total	60	63.7	90	90	N/A	N/A	N/A	N/A	None	None	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Note: dBA = A-weighted decibel. L_{eq} = equivalent continuous noise level. L_{max} = maximum noise level.

Figure 4.7-6. Hot Springs Renovation Noise Estimates at 500 Feet from Source.

The resulting predicted L_{eq} for the construction activities group at a distance of 100 feet is 77.6 dBA and at a distance of 500 feet is 63.7 dBA.

At distances from the noise-generating activities of greater than 2,000 feet (0.38 miles), predicted noise levels are not significantly above measured background sound levels and would not likely have an adverse impact on receptors.

4.7.1 Evaluation Criteria

An alternative would be considered to result in an adverse impact related to noise if it would result in either of the following:

- the exposure of receptors to construction noise levels in excess of U.S. Environmental Protection Agency (EPA) standards, as stated in Table 3.7-2 in Section 3.7
- exposure of persons or structures to excessive ground-borne vibration

4.7.2 Alternative A

4.7.2.1 Impacts from Construction

Under Alternative A, construction activities associated with the construction of a new CBOC in Hot Springs and a new MSOC and RRTP in Rapid City would occur. These activities would be accompanied by a conservatively predicted short-term noise level increase to approximately 81.0 dBA at 100 feet from the source and 67.0 dBA at 500 feet from the source (comparable to traffic sound levels from a nearby freeway). The increase in noise levels in the vicinity of the construction activities would be short-term but noticeable. As the distance from the source is increased, the noise levels attributable to the construction activities continue to decrease as they approach existing background sound levels. In the event that VA operations are located in existing facilities rather than newly constructed facilities, the construction-related noise level increases described would not occur.

The perceived impacts from the increase in noise levels would depend on the receptor and site-specific conditions (including sound shielding). Locations for the proposed new facilities have not yet been selected, thus noise-related impacts to specific receptors cannot be determined. However, the predicted increases in noise levels would be consistent with typical urban construction projects, activities could be scheduled for normal daytime business hours, and proper equipment maintenance and noise shielding would minimize noise level increases from construction activities. Sound levels, in the immediate vicinity of the construction activities averaged over an entire day may approach the EPA-recommended noise level standards.

Construction activities would include vibration-producing activities (such as excavation, grading, basement excavation, and clearing). Depending on the specific construction equipment used and operations involved, short-term increases in ground vibration may result. Because locations for the proposed new facilities have not yet been selected, vibration-related impacts to specific receptors cannot be determined. The increase in vibration levels in the vicinity of the construction activities would be short-term but noticeable. Activities would be limited to daytime hours and would be anticipated to be a minor disturbance to neighboring receptors.

Construction-related noise impacts would be adverse, short-term, and potentially moderate in magnitude (approaching EPA threshold levels), depending on the receptor type and proximity to the project location. Construction-related vibration impacts would also be adverse, short-term, and potentially moderate in magnitude, depending on the receptor type and proximity to the project location. Mitigation, minimization, monitoring, and best practices to control noise and vibration impacts are listed in Chapter 5.

4.7.2.2 Impacts from Operation

Routine operation of a CBOC, MSOC, and RRTP would not significantly increase sound levels from existing background levels. New facilities could be designed to position and incorporate sound shielding for stationary noise-generating equipment (such as refrigeration units). Traffic-related noise levels may increase in the vicinity of the proposed new facilities, but would not be expected to increase disproportionately from current levels typical of urban settings. Routine operation would not be expected to increase vibration levels.

Operation-related noise impacts would be minor. Operation-related vibration impacts would not be expected.

4.7.3 Alternative B

4.7.3.1 Impacts from Construction

Under Alternative B, construction activities associated with the construction of a new CBOC and RRTP in Hot Springs and a new MSOC in Rapid City would occur. These activities would be accompanied by a conservatively predicted short-term noise level increase to approximately 81.0 dBA at 100 feet from the source and 67.0 dBA at 500 feet from the source (comparable to traffic sound levels from a nearby freeway). The increase in noise levels in the vicinity of the construction activities would be short-term but noticeable. As the distance from the source is increased, the noise levels attributable to the construction activities continue to decrease as they approach existing background sound levels. In the event that VA operations are located in existing facilities rather than newly constructed facilities, the construction-related noise level increases described would not occur.

The perceived impacts from the increase in noise levels would depend on the receptor and site-specific conditions (including sound shielding). Locations for the new facilities have not yet been selected, and noise-related impacts to specific receptors cannot be determined. However, the predicted increases in noise levels would be consistent with typical urban construction projects, activities could be scheduled for normal daytime business hours, and proper equipment maintenance and noise shielding would minimize noise level increases from construction activities. Sound levels in the immediate vicinity of the construction activities averaged over an entire day may approach the EPA-recommended noise level standards.

Construction activities would include vibration-producing activities (such as excavation, grading, basement excavation, and clearing). Depending on the specific construction equipment used and operations involved, short-term increases in ground vibration may result. Locations for the new facilities have not yet been selected, thus vibration-related impacts to specific receptors cannot be determined. The increase in vibration levels in the vicinity of the construction activities would be short-term but noticeable. Activities would be limited to daytime hours and would be anticipated to be a minor disturbance to neighboring receptors.

Construction-related noise impacts would be adverse, short-term, and potentially moderate in magnitude (approaching EPA threshold levels) depending on the receptor type and proximity to the project location. Construction-related vibration impacts would also be adverse, short-term, and potentially moderate in magnitude depending on the receptor type and proximity to the project location. Mitigation, monitoring, minimization, and best practices to control noise and vibration impacts are listed in Chapter 5.

4.7.3.2 Impacts from Operation

Routine operation of a CBOC, MSOC, and RRTP would not significantly increase sound levels from existing background levels. New facilities could be designed to position and incorporate sound shielding for stationary noise-generating equipment (such as refrigeration units). Traffic-related noise levels may increase in the vicinity of new facility locations, but would not be expected to increase disproportionately from current levels typical of urban settings. Routine operation would not be expected to increase vibration levels.

Operation-related noise impacts would be minor. Operation-related vibration impacts would not be expected.

4.7.4 Alternative C

4.7.4.1 Impacts from Construction

Under Alternative C, the existing CBOC and RRTP facilities in Hot Springs would be renovated, and a new MSOC in Rapid City would be constructed. Construction activities would be accompanied by a conservatively predicted short-term noise level increase to approximately 81.0 dBA at 100 feet from the source and 67.0 dBA at 500 feet from the source (comparable to traffic sound levels from a nearby freeway). The increase in noise levels in the vicinity of the construction activities would be short-term but noticeable. As the distance from the source is increased, the noise levels attributable to the construction activities continue to decrease as they approach existing background sound levels. In the event that VA operations are located in existing facilities rather than newly constructed facilities, the construction-related noise level increases described would not occur.

Renovation activities would be accompanied by a conservatively predicted short-term noise level increase to approximately 77.6 dBA at 100 feet from the source and 63.7 dBA at 500 feet from the source (comparable to traffic sound levels from a nearby freeway). The increase in noise levels in the vicinity of the renovation activities would be short-term but noticeable. As the distance from the source is increased, the noise levels attributable to the renovation activities continue to decrease as they approach existing background sound levels.

The perceived impacts from the increase in noise levels would depend on the receptor and site-specific conditions (including sound shielding). Locations for the new facilities have not yet been selected, thus noise-related impacts to specific receptors cannot be determined. However, the predicted increases in noise levels would be consistent with typical urban construction projects, activities could be scheduled for normal daytime business hours, and proper equipment maintenance and noise shielding would minimize noise level increases from construction activities. Sound levels in the immediate vicinity of the construction activities averaged over an entire day may approach the EPA-recommended noise level standards.

Construction activities would include vibration-producing activities (such as excavation, grading, basement excavation, and clearing). Depending on the specific construction equipment used and operations involved, short-term increases in ground vibration may result. Locations for the new facilities have not yet been selected, thus vibration-related impacts to specific receptors cannot be determined. The increase in vibration levels in the vicinity of the construction and renovation activities would be short-term but noticeable. Activities would be limited to daytime hours and would be anticipated to be a minor disturbance to neighboring receptors.

Construction-related noise impacts would be adverse, short-term, and potentially moderate in magnitude (approaching EPA threshold levels) depending on the receptor type and proximity to the project location. Construction-related vibration impacts would also be adverse, short-term, and moderate in magnitude depending on the receptor type and proximity to the project location. Mitigation, monitoring, minimization, and best practices to control noise and vibration impacts are listed in Chapter 5.

4.7.4.2 Impacts from Operation

Routine operation of a CBOC, MSOC, and RRTP would not significantly increase sound levels from existing background levels. New facilities could be designed to position and incorporate sound shielding for stationary noise-generating equipment (such as refrigeration units). Traffic-related noise levels may increase in the vicinity of the new facility locations, but would not be expected to increase disproportionately from current levels typical of urban settings. Routine operation would not be expected to increase vibration levels.

Operation-related noise impacts would be minor. Operation-related vibration impacts would not be expected.

4.7.5 Alternative D

4.7.5.1 Impacts from Construction

Under Alternative D, construction activities associated with the construction of a new CBOC and RRTP in Hot Springs and a new MSOC and RRTP in Rapid City would occur. These activities would be accompanied by a conservatively predicted short-term noise level increase to approximately 81.0 dBA at 100 feet from the source and 67.0 dBA at 500 feet from the source (comparable to traffic sound levels from a nearby freeway). The increase in noise levels in the vicinity of the construction activities would be short-term but noticeable. As the distance from the source is increased, the noise levels attributable to the construction activities continue to decrease as they approach existing background sound levels. In the event that VA operations are located in existing facilities rather than newly constructed facilities, the construction-related noise level increases described would not occur.

The perceived impacts from the increase in noise levels would depend on the receptor and site-specific conditions (including sound shielding). Locations for the new facilities have not yet been selected, thus noise-related impacts to specific receptors cannot be determined. However, the predicted increases in noise levels would be consistent with typical urban construction projects, activities could be scheduled for normal daytime business hours, and proper equipment maintenance and noise shielding would minimize noise level increases from construction activities. Sound levels,

in the immediate vicinity of the construction activities averaged over an entire day may approach the EPA-recommended noise level standards.

Construction activities would include vibration-producing activities (such as excavation, grading, basement excavation, and clearing). Depending on the specific construction equipment used and operations involved, short-term increases in ground vibration may result. Locations for the new facilities have not yet been selected, thus vibration-related impacts to specific receptors cannot be determined. The increase in vibration levels in the vicinity of the construction and demolition activities would be short-term but noticeable. Activities would be limited to daytime hours and would be anticipated to be a minor disturbance to neighboring receptors.

Construction-related noise impacts would be adverse, short-term, and potentially moderate in magnitude (approaching EPA threshold levels) depending on the receptor type and proximity to the project location. Construction-related vibration impacts would also be adverse, short-term, and potentially moderate depending on the receptor type and proximity to the project location. Mitigation, monitoring, minimization, and best practices to control noise and vibration impacts are listed in Chapter 5.

4.7.5.2 Impacts from Operation

Routine operation of a CBOC, MSOC, and RRTP would not significantly increase sound levels from existing background levels. New facilities could be designed to position and incorporate sound shielding for stationary noise-generating equipment (such as refrigeration units). Traffic-related noise levels may increase in the vicinity of the new facility locations, but would not be expected to increase disproportionately from current levels typical of urban settings. Routine operation would not be expected to increase vibration levels.

Operation-related noise impacts would be minor. Operation-related vibration impacts would not be expected.

4.7.6 Alternative E

4.7.6.1 Impacts from Construction

Under Alternative E, some of the existing facilities in Hot Springs would be renovated, and a building would be constructed to accommodate the additional RRTP beds. Renovation and construction activities would be accompanied by a conservatively predicted short-term noise level increase to approximately 77.6 dBA at 100 feet from the source and 63.7 dBA at 500 feet from the source (comparable to traffic sound levels from a nearby freeway). The increase in noise levels in the vicinity of the renovation and construction activities would be short-term but noticeable. As the distance from the source is increased, the noise levels attributable to the renovation and construction activities continue to decrease as they approach existing background sound levels.

The perceived impacts from the increase in noise levels would depend on the receptor and site-specific conditions (including sound shielding). The predicted increases in noise levels would be consistent with typical urban construction projects, activities could be scheduled for normal daytime business hours, and proper equipment maintenance and noise shielding would minimize noise level increases from construction activities. Sound levels, in the immediate vicinity of the renovation and

construction activities and averaged over an entire day, may approach the EPA-recommended noise level standards.

Renovation activities could include vibration-producing activities (such as excavation, grading, and clearing). Depending on the specific construction equipment used and operations involved, short-term increases in ground vibration may result. The increase in vibration levels in the vicinity of the construction and renovation activities would be short-term but noticeable. Activities would be limited to daytime hours and would be anticipated to be a minor disturbance to neighboring receptors.

Construction-related noise impacts would be adverse, short-term, and potentially moderate in magnitude (approaching EPA threshold levels) depending on the receptor type and proximity to the project location, including day and residential Veteran patients on campus. Construction-related vibration impacts would also be adverse, short-term, and potentially moderate, depending on the receptor type and proximity to the project location. Mitigation, monitoring, minimization, and best practices to control noise and vibration impacts are listed in Chapter 5.

4.7.6.2 Impacts from Operation

Routine operation of the VA hospital and RRTP would not significantly increase sound levels from existing background levels at the Hot Springs campus. Renovated facilities could be designed to position and incorporate sound shielding for stationary noise-generating equipment (such as refrigeration units). Traffic-related noise levels may increase due to increased campus activity, but would not be expected to increase appreciably from current levels onsite. Routine operation would not be expected to increase vibration levels.

Operation-related noise impacts would be minor. Operation-related vibration impacts would not be expected.

4.7.7 Alternative F

4.7.7.1 Impacts from Construction

Under Alternative F, some of the existing facilities in Hot Springs would be renovated as annual budgets allow. Renovation activities would be accompanied by a conservatively predicted short-term noise level increase to approximately 77.6 dBA at 100 feet from the source and 63.7 dBA at 500 feet from the source (comparable to traffic sound levels from a nearby freeway). The increase in noise levels in the vicinity of the renovation activities would be short-term but noticeable. As the distance from the source is increased, the noise levels attributable to the renovation activities continue to decrease as they approach existing background sound levels.

The perceived impacts from the increase in noise levels would depend on the receptor and site-specific conditions (including sound shielding). The predicted increases in noise levels would be consistent with typical urban renovation projects, activities could be scheduled for normal daytime business hours, and proper equipment maintenance and noise shielding would minimize noise level increases from construction activities. Sound levels, in the immediate vicinity of the renovation activities, averaged over an entire day may approach the EPA-recommended noise level standards.

No vibration-producing activities (such as excavation, grading, and clearing) are anticipated.

Construction-related noise impacts would be adverse, short-term, and potentially moderate in magnitude (approaching EPA threshold levels) depending on the receptor type and proximity to the project location, including day and residential Veteran patients on campus. Construction-related vibration impacts are not anticipated. Mitigation monitoring, minimization, and best practices to control noise and vibration impacts are listed in Chapter 5.

4.7.7.2 Impacts from Operation

Continued operation of the Hot Springs VAMC and domiciliary would not increase sound levels from existing background levels. Renovated facilities could be designed to position and incorporate sound shielding for stationary noise-generating equipment (such as refrigeration units). Routine operation would not be expected to increase vibration levels.

Operation-related noise and vibration impacts would not be expected.

4.7.8 Supplemental Alternative G

4.7.8.1 Impacts from Construction

Under Supplemental Alternative G, some or all of the existing facilities at the VA Hot Springs campus would be re-used by other tenants. Depending on the intended use, some facility renovation or small-scale construction could occur. Impacts would be similar to those of Alternatives E (if there was some construction) or Alternative F (if improvements consisted only of renovations).

4.7.8.2 Impacts from Operation

The operational noise-generating potential of new tenants on the existing VA Hot Springs campus would depend on the intended use. However, uses would be compatible with the site's status as a National Historic Landmark; therefore, industrial operations or similar activities that would generate excessive noise would not occur, and noticeable increases in sound levels from existing background levels would not be expected. Renovated facilities could be designed to position and incorporate sound shielding for stationary noise-generating equipment (such as refrigeration units). Routine operation would not be expected to increase vibration levels.

Operation-related noise and vibration impacts would not be expected.

4.8 Land Use

4.8.1 Evaluation Criteria

The evaluation of land use impacts focuses on current land use plans and zoning. In carrying out its federal functions, VA is not subject to state or local regulations absent a clear statutory waiver to the contrary. This concept is based upon the Supremacy Clause (Article VI) of the U.S. Constitution. Although local governments cannot regulate or permit activities of the federal government on federally owned land, federal agencies must consider local zoning laws for new building construction (40 United States Code [U.S.C.] 619(b)). VA actions on non-federal land (such as at a leased facility) are subject to the regulatory requirements of the landowner, including local plans and ordinances pertaining to land use and zoning.

General compatibility with existing and future land use designations and zoning ordinances is the basis to indicate the potential for land use impacts. Adverse land use impacts are identified if the reconfiguration proposal would:

- Be inconsistent with current or planned future land uses and community goals for land use
- Alter the character and use of the land in relation to surrounding uses
- Conflict with zoning designations or ordinances

4.8.2 Alternative A

4.8.2.1 Impacts from Construction

Construction of the proposed CBOC in the Hot Springs area and the proposed co-located MSOC and RRTP in the Rapid City area would cause disturbances to adjacent land uses. The extent of the disturbance would depend on the type of adjacent land use. Should the adjacent land use be commercial or retail, daytime construction could have a temporary effect on access to these businesses and could be inconvenient to customers. Construction activities would not likely affect adjacent land use that is vacant (undeveloped), but could disturb users of adjacent land use that is open space or parkland.

4.8.2.2 Impacts from Operation

4.8.2.2.1 Hot Springs

The criteria for selecting a site in the Hot Springs area to operate a CBOC would be generally compatible with the land use objectives of the Hot Springs Comprehensive Plan (see Section 3.8.1.2.4) and current zoning. VA design guidance requirements for advancing local planning goals, prioritizing areas that are currently served by public infrastructure (utilities and roads), and protecting the natural environment while avoiding environmental hazards are generally compatible with the Hot Springs Comprehensive Plan objectives of intensifying land uses adjacent to transportation facilities, clustering activities to promote efficient land use, and prohibiting development in natural hazard areas. Based on the land use and zoning throughout Hot Springs (see Figure 3.8-1), it is anticipated a suitable site of five acres would be available in or adjacent to General Commercial, Mixed Use, or Highway Service zoning where a CBOC would be a compatible land use and not substantially conflict with zoning designations.

VA BHHCS would continue to maintain the Hot Springs campus (although health care services would not be offered there) and the National Cemetery would be operated and maintained as usual; thus, there would be no impact on land use. Although VA health care services would continue to be offered in the Hot Springs area, vacating the campus would change one of "the factors [that] represent the keys to the future strength and vitality of the Hot Springs' economy" in the City of Hot Springs Comprehensive Plan, which assumed the campus "will continue to grow in size and importance". However, as federally owned land, the campus is not subject to local land use planning or zoning restrictions. Potential land use impacts due to re-use of the campus are described as part of Alternative G (see Section 4.8.8).

4.8.2.2.2 Rapid City

Both the Pennington County and Rapid City comprehensive plans recognize the area as a regional center for health care. The criteria for selecting sites in the Rapid City area to operate an MSOC and RRTP would be generally compatible with the planning policies that endorse health care services development (see Section 3.8.1.2.4). VA design guidance requirements for advancing local planning goals, prioritizing areas that are currently served by public infrastructure (utilities and roads), and protecting the natural environment while avoiding environmental hazards are generally compatible with the Rapid City Comprehensive Plan goals and policies of targeting infrastructure investments, supporting a diverse mix of land uses, and protecting natural resources. The city has sufficient scale, complexity, utilities, and other characteristics necessary to accommodate both an MSOC and RRTP. Based on the future land use throughout Rapid City (see Figure 3.8-2), it is anticipated suitable sites would be available in or adjacent to areas identified as Mixed Use or Employment categories where health care facilities would be a compatible land use. The Rapid City Comprehensive Plan provides flexibility in applying future land use categories; thus, site selection and facility design for an MSOC and RRTP should not substantially conflict with current or planned future land uses.

The Rapid City zoning ordinance (Rapid City 2014b) defines medical facilities to include "medical clinic" and "sanitarium." Medical clinic is further defined as an examination and treatment facility for outpatients, whereas sanitarium is defined as an institution providing health facilities for inpatient medical treatment or treatment and recuperation using natural therapeutic agents. These definitions would include the health care services that would be provided at an MSOC and RRTP. The zoning ordinance allows for medical facilities in districts zoned as General Commercial, Neighborhood Commercial, Neighborhood Shopping Center, Community Shopping Center, or Office Commercial. A proposed MSOC and RRTP in the Rapid City area would require 14 to 17 acres. It is anticipated suitable sites would be available in or adjacent to these zoning districts; thus, operation of an MSOC and RRTP would not substantially conflict with zoning designations or the zoning ordinance.

The zoning ordinance defines group home as a facility that provides room, board, counseling, and rehabilitative services for individuals who, by reason of mental or physical disability, addiction to drugs or alcohol, or family and school adjustment problems, require specialized attention and care in order to achieve personal independence. This definition would include the health care services provided at the RRTP. A group home is a conditional use that may be permitted in Low, Medium, and High Density Residential and General Commercial zoning districts, as well as the Central Business district. It is anticipated suitable sites would be available in or adjacent to these zoning districts; thus, operation of an RRTP would not substantially conflict with these zoning designations or the zoning ordinance.

4.8.3 Alternative B

4.8.3.1 Impacts from Construction

Construction of a CBOC and RRTP in the Hot Springs area and an MSOC in the Rapid City area would cause disturbances to adjacent land uses. The extent of the disturbance would depend on the type of adjacent land use, and in Hot Springs the extent of disturbance would also depend on whether the CBOC and RRTP would be at separate sites or co-located. The potential land use impacts from construction would be similar to the impacts described for Alternative A.

4.8.3.2 Impacts from Operation

4.8.3.2.1 Hot Springs

The criteria for selecting sites in the Hot Springs area to operate a CBOC and 100-bed RRTP would be generally compatible with the land use objectives of the Hot Springs Comprehensive Plan and current zoning. Impacts to land use would be similar to the impacts described for Alternative A. However, a suitable site of 11 to 13 acres in the Hot Springs area to co-locate a CBOC and RRTP with a fire station may be difficult to locate within the currently zoned areas for General Commercial and Mixed Use as a compatible land use. A suitable site may be available within or adjacent to Highway Service zoning to avoid incompatible land uses, or located on land not zoned where a potential land use conflict could occur. The extent of any incompatible land use would depend on the surrounding land use and planned future use.

Health care services would not be offered at the VA Hot Springs campus. The land use impacts of vacating the campus are similar to the impacts described for Alternative A.

4.8.3.2.2 Rapid City

The criteria for selecting a site in the Rapid City area to operate an MSOC would be generally compatible with the planning policies that endorse health care services development and the zoning ordinances that apply to medical facilities. Impacts to land use and zoning from siting and operating an MSOC in the Rapid City area would be similar to the impacts described for Alternative A. Because only an MSOC would be proposed under Alternative B, the land use and zoning restrictions for siting and operating an RRTP would not apply.

4.8.4 Alternative C

4.8.4.1 Impacts from Construction

Renovations and modifications to buildings on the VA Hot Springs campus would not affect land use. No construction is proposed elsewhere in Hot Springs under this alternative so there would be no conflicts with existing land use and zoning designations. Potential temporary impacts to adjacent land uses from construction of an MSOC in Rapid City would be similar to the temporary impacts described for Alternative A.

4.8.4.2 Impacts from Operation

4.8.4.2.1 Hot Springs

Health care operations and building maintenance would continue at the VA Hot Springs campus, which would not affect the existing land use of the campus or the land uses or zoning designations of the areas surrounding the campus. As federally owned land, operation of the campus is not subject to local planning or zoning restrictions.

4.8.4.2.2 Rapid City

Impacts to land use and zoning from siting and operating an MSOC in the Rapid City area would be similar to the impacts described for Alternative B.

4.8.5 Alternative D

4.8.5.1 Impacts from Construction

Construction of a CBOC and 24-bed RRTP in the Hot Springs area and an MSOC and 76-bed RRTP in Rapid City area would cause disturbances to adjacent land uses. The extent of the disturbance would depend on the type of adjacent land use, and whether the facilities would be at separate sites or co-located. The potential temporary land use impacts from construction would be similar to the impacts described for Alternative A.

4.8.5.2 Impacts from Operation

4.8.5.2.1 Hot Springs

The criteria for selecting sites in the Hot Springs area to operate a CBOC and 24-bed RRTP with a fire station would be generally compatible with the land use objectives of the Hot Springs Comprehensive Plan and current zoning. Impacts to land use would be similar to the impacts described for Alternative A if the facilities are at separate locations or similar to Alternative B if the facilities are co-located.

Health care services would not be offered at the VA Hot Springs campus. The land use impacts of vacating the campus are similar to the impacts described for Alternative A.

4.8.5.2.2 Rapid City

Impacts to land use and zoning from siting and operating an MSOC and 76-bed RRTP in the Rapid City area would be similar to the impacts described for Alternative A. Although the RRTP proposed for the Rapid City area would have fewer beds than Alternative A, the size of the site (14 to 17 acres) to co-locate the RRTP and MSOC would be similar.

4.8.6 Alternative E

4.8.6.1 Impacts from Construction

Renovations and modifications to buildings and construction of additional buildings on the VA Hot Springs campus are proposed under Alternative E. Open space that might be suitable for construction of new buildings is scattered throughout the campus. Although the overall use of the

campus for health care services would remain, open space land use would be lost to construction of new buildings. Expansion on the campus would be consistent with the City of Hot Springs' planning, which assumed the campus "will continue to grow in size and importance". No construction is proposed elsewhere in Hot Springs under this alternative so there would be no conflicts with existing land use and zoning designations off the campus.

Because no modifications to the existing CBOC in Rapid City are proposed and an MSOC would not be constructed, there would be no temporary impacts on land use or zoning from construction activities in the Rapid City area.

4.8.6.2 Impacts from Operation

4.8.6.2.1 Hot Springs

Health care operations and building maintenance would continue at the VA Hot Springs campus, which would not affect the existing land uses or zoning designations of the areas surrounding the campus. Although the overall use of the campus for health care services would remain, open space land use would be lost to accommodate new buildings. As federally owned land, operation of the campus is not subject to local planning or zoning restrictions.

4.8.6.2.2 Rapid City

The CBOC would continue to operate in Rapid City. If space is leased in a different location for a CBOC upon the expiration of the current lease, it is anticipated that another location in Rapid City would be in compliance with the zoning ordinances for medical facilities and there would be no impact on land uses.

4.8.7 Alternative F

4.8.7.1 Impacts from Construction

Upgrades and renovations to buildings to maintain clinical standards would be initiated as funding was available through the routine budgeting process. These construction projects would not affect the existing land uses or zoning designations of the areas surrounding the VA Hot Springs campus. There would be no upgrades or renovations to the existing CBOC in Rapid City so there would be no temporary impacts on land use or zoning from construction.

4.8.7.2 Impacts from Operation

4.8.7.2.1 Hot Springs

Health care operations and building maintenance would continue at the VA Hot Springs campus, which would not affect the existing land use of the campus or the land uses or zoning designations of the areas surrounding the campus. As federally owned land, operation of the campus is not subject to local planning or zoning restrictions.

4.8.7.2.2 Rapid City

The CBOC would continue to operate in Rapid City. If space is leased in a different location for a CBOC upon the expiration of the current lease, it is anticipated that the different location in Rapid

City would be in compliance with the zoning ordinances for medical facilities and there would be no impact on land uses.

4.8.8 Supplemental Alternative G

4.8.8.1 Impacts from Construction

Supplemental Alternative G involves full or partial re-use of the VA Hot Springs campus and could only happen with implementation of Alternatives A, B, C, or D. If the proposed re-use included any renovations or modifications to buildings or construction of additional buildings on the VA Hot Springs campus, these actions would be consistent with the City of Hot Springs' planning, which assumed the campus "will continue to grow in size and importance" and construction impacts would be similar to or less than those impacts described for Alternative E. If the potential re-use did not require any construction, renovation, or modification, potential impacts from construction would be similar to the impacts described for Alternative F.

4.8.8.2 Impacts from Operation

Impacts to existing land use of the campus or to the land uses or zoning designations of the areas surrounding the campus would depend on the type of re-use selected. Should the re-use involve renovations and modifications to buildings and construction of additional buildings on the VA Hot Springs campus to continue to operate as a medical facility, potential land use impacts would be similar to the impacts described for Alternative E.

If VA retains ownership of the Hot Springs campus and re-use is accomplished through an enhanced-use lease, or if it is transferred to another federal agency, there would be no adverse effects on land use from implementing Supplemental Alternative G.

Should re-use involve the transfer of land ownership from the federal government, re-use plans would be subject to the Hot Springs Comprehensive Plan and zoning ordinances. Depending on the proposed type of re-use, the re-use proponent may have to coordinate with the City of Hot Springs to avoid conflict with, request a waiver from, or revise current land use plans and zoning ordinances. VA BHHCS would also ensure that any transfer agreement to a non-federal entity is developed in accordance with the outcome of appropriate *National Historic Preservation Act* consultation, and that the agreement incorporates conditions and restrictions to ensure the prospective landowner would maintain the National Historic Landmark status of the site.

4.9 Floodplains and Wetlands

4.9.1 Evaluation Criteria

Executive Order 11988, *Floodplain Management*, requires VA to avoid adverse impacts associated with occupancy and modification of floodplains to the extent possible, and avoid direct and indirect support of floodplain development wherever there is a practicable alternative. According to the VA Site Development Design Manual, development within the 100-year floodplain should be avoided or limited, with structures in the floodplain only if absolutely necessary. For purposes of this evaluation, an impact to floodplains would be considered adverse if development impedes or redirects flood flows, no practicable alternative exists to development within a 100-year floodplain, or compliance with flood hazard reduction requirements is not technically or economically feasible.

Section 404 of the *Clean Water Act* requires authorization for activities that fill or disturb waters of the U.S, including wetlands. USACE determines if a wetland is within their jurisdictional authority to regulate waters of the U.S. To be a jurisdictional wetland, it must meet the regulatory definition and be adjacent to other waters of the U.S. For purposes of this evaluation, an impact to wetlands would be considered adverse if the loss of a jurisdictional wetland cannot be avoided or if compensatory mitigation is not feasible, and USACE does not authorize the activity that fills or disturbs the wetland.

4.9.2 Alternative A

4.9.2.1 Impacts from Construction

There are no special flood hazard areas, other flood areas, or wetlands on the VA Hot Springs campus that could be impacted. (Note that no construction on the campus is proposed under Alternative A.)

One criterion to selecting a site in Hot Springs to construct a CBOC and in Rapid City to construct an MSOC and RRTP would be to avoid sites within a designated 100-year floodplain. The size of the site for a proposed CBOC in Hot Springs is five acres. Based on the location and extent of the flood-prone areas throughout Hot Springs (see Figure 3.9-1), it is anticipated a suitable site would be available outside the 100-year floodplain to meet this site selection criterion. There would be practicable alternatives to developing within the 100-year floodplain; thus, construction activities would not impede flood flows or impact a floodplain in the Hot Springs area.

A proposed MSOC and RRTP in Rapid City would require 10 acres each or 14 to 17 acres if the buildings are co-located. The special flood hazard zones are located throughout the city and the extent varies based on proximity to Rapid Creek and to the larger tributaries and drainages entering Rapid Creek (see Figure 3.9-2). Together with other siting criteria, such as natural and built site features, infrastructure improvements, and public transportation access, the criterion of avoiding the 100-year floodplain would likely be met. Construction activities would therefore not impede flood flows or impact a 100-year floodplain in the Rapid City area.

A site could be selected in Rapid City within the 500-year floodplain, including the area of reduced flood risk due to levees, if other siting criteria are available and acceptable. New construction or renovation of existing buildings are permitted by the City of Rapid City within these other flood areas without specific flood reduction design and construction requirements, such as finished floor

elevations or floodproofing. Construction in these areas would not impede flood flows or cause a rise in flood elevations.

The wetland adjacent to Fall River in Hot Springs would not be impacted by construction simply because of its location. The two wetlands in the northeast corner of Hot Springs would not likely be impacted because their locations appear to be on residential properties near houses. This area would not meet the site selection criteria for a CBOC. The two manmade excavations in the southwest, regardless if disturbed by construction, would not meet the regulatory definition of a wetland and the locations are not adjacent to Fall River or other waters of the U.S. Therefore, no jurisdictional wetlands would be impacted by construction of a CBOC in Hot Springs.

Many of the wetlands shown on the National Wetlands Inventory in Rapid City are within or near the 100- and 500-year floodplains. Because of the floodplain locations, construction of an MSOC and RRTP would not likely impact these wetlands. It is possible a wetland(s) shown on the National Wetlands Inventory or observed in the field could be on a site determined to be available and meeting the selection criteria for acceptable siting for an MSOC and RRTP. Construction could impact the wetland(s) if the site design and layout of buildings and infrastructure could not avoid disturbing the wetland(s). The extent of any impact would not only depend on whether the wetland met the regulatory definition, but also the function, value, quality, and size of the wetland(s) that could be disturbed during construction.

Field surveys would be completed of potential sites to determine presence and jurisdiction of any wetlands. Impacts to jurisdictional (regulated) wetlands would be minimized to the extent practicable during construction. If jurisdictional wetlands cannot be avoided, VA would develop a mitigation plan to compensate for the lost function and value of the wetland either by creating or enhancing other wetlands onsite or at an offsite location through an established mitigation bank, or through an in-lieu fee program.

Impacts to any nearby floodplains or wetlands from changes to the site hydrology, stormwater runoff patterns, and stormwater volumes are addressed in Section 4.5. Site designs or structures, such as drainage swales or detention basins, could be necessary to manage stormwater on the selected site. Any such design or structure could potentially serve a secondary purpose of wetland creation.

4.9.2.2 Impacts from Operation

VA BHHCS would continue to maintain the VA Hot Springs campus, although health care operations would not be offered at that location. There are no special flood hazard areas, other flood areas, or wetlands on the campus that could be impacted regardless of continued maintenance activities.

Operations of a CBOC, MSOC, and RRTP at new locations in Hot Springs and Rapid City would not impede flood flows or affect floodplains or wetlands. Impacts to floodplains and wetlands would be addressed during the design and construction phases of the buildings at the selected sites.

4.9.3 Alternative B

4.9.3.1 Impacts from Construction

There are no special flood hazard areas, other flood areas, or wetlands on the VA Hot Springs campus that could be impacted (note that no construction on the campus is proposed under Alternative B).

Potential impacts to floodplains and wetlands from construction would be similar to the impacts described for Alternative A. It is anticipated a suitable site of 11 to 13 acres would be available outside the 100-year floodplain in the Hot Springs area to co-locate a CBOC and RRTP with a fire station; thus, construction activities would not impede flood flows or impact the floodplain or wetlands. Because only an MSOC (10-acre site) is proposed for Rapid City, the extent of any construction-related impact on floodplains and wetlands could be less than Alternative A, but would depend on the location and features of the selected site. The process for identifying and minimizing impacts to any jurisdictional wetlands on potential sites would be as described for Alternative A.

4.9.3.2 Impacts from Operation

VA BHHCS would continue to maintain the Hot Springs campus, although health care operations would not be offered at this location. There are no floodplains or wetlands on the campus that could be impacted regardless of continued maintenance.

Operations of a CBOC, MSOC, and RRTP at new locations in Hot Springs and Rapid City would not impede flood flows or affect floodplains or wetlands. Impacts to floodplains and wetlands would be addressed during the design and construction phases of the buildings at the selected sites.

4.9.4 Alternative C

4.9.4.1 Impacts from Construction

There are no floodplains or wetlands on the VA Hot Springs campus that could be impacted, regardless of renovations and modifications proposed to campus buildings under Alternative C.

No construction is proposed elsewhere in Hot Springs under this alternative so floodplains and wetlands would not be affected.

Potential impacts to floodplains and wetlands from construction of an MSOC proposed for Rapid City would be similar to the impacts described for Alternative A. Because only a 10-acre site is proposed instead of a larger site to co-locate an RRTP, the extent of any construction-related impact on floodplains and wetlands could be less than Alternative A, but would depend on the location and features of the selected site. The process for identifying and minimizing impacts to any jurisdictional wetlands on potential sites would be as described for Alternative A.

4.9.4.2 Impacts from Operation

Health care operations and building maintenance would continue at the VA Hot Springs campus. There are no floodplains or wetlands on the campus that could be impacted regardless of continued operations and maintenance.

Operations of an MSOC at a new location in Rapid City would not impede flood flows or affect floodplains or wetlands. Impacts to floodplains and wetlands would be addressed during the design and construction phases of the buildings at the selected site.

4.9.5 Alternative D

4.9.5.1 Impacts from Construction

There are no floodplains or wetlands on the VA Hot Springs campus that could be impacted (note that no construction on the campus is proposed under Alternative B).

Potential impacts to floodplains and wetlands from construction in Hot Springs and Rapid City would be similar to the impacts described for Alternative A. It is anticipated a suitable site of 11 to 13 acres would be available outside the 100-year floodplain in the Hot Springs area to co-locate a CBOC and 24-bed RRTP with a fire station; thus, construction activities would not impede flood flows or impact the floodplain or wetlands. Although the RRTP proposed for Rapid City would be smaller than Alternative A, the size of the site (14 to 17 acres) to co-locate the RRTP and MSOC would be similar. The extent of any construction-related impact on floodplains and wetlands in Rapid City would depend on the location and features of the selected site. The process for identifying and minimizing impacts to any jurisdictional wetlands on potential sites would be as described for Alternative A.

4.9.5.2 Impacts from Operation

VA would continue to maintain the Hot Springs campus, although health care operations would no longer be offered there. There are no floodplains or wetlands on the campus that could be impacted regardless of continued maintenance.

Operations of a CBOC and RRTP with a fire station at a different location in Hot Springs and an MSOC and RRTP at a new location in Rapid City would not impede flood flows or affect floodplains or wetlands. Impacts to floodplains and wetlands would be addressed during the design and construction phases of the buildings at the selected sites.

4.9.6 Alternative E

4.9.6.1 Impacts from Construction

There are no floodplains or wetlands on the VA Hot Springs campus that could be impacted, regardless of renovations and modifications to campus buildings and construction of additional buildings proposed under Alternative E.

Because no modifications to the existing CBOC in Rapid City are proposed and an MSOC would not be constructed, there would be no affect to floodplains or wetlands. If space is leased in a different location for a CBOC upon the expiration of the current lease, it is anticipated that the different location in Rapid City and any interior modifications to the building would be in compliance with floodplain ordinances.

4.9.6.2 Impacts from Operation

Health care operations would continue at the VA Hot Springs campus. There are no floodplains or wetlands on the campus that could be impacted regardless of expanded operations and maintenance.

There would be no changes to health care operations in Rapid City that would have any effect on floodplains or wetlands.

4.9.7 Alternative F

4.9.7.1 Impacts from Construction

There are no floodplains or wetlands on the VA Hot Springs campus that could be impacted, regardless of upgrades and renovations over time to buildings to maintain clinical standards.

The existing CBOC in Rapid City is not within any floodplain, and there would be no changes that would affect nearby floodplains or wetlands. If space is leased in a different location for a CBOC upon the expiration of the current lease, it is anticipated that the different location in Rapid City and any interior modifications to the building would be in compliance with floodplain ordinances.

4.9.7.2 Impacts from Operation

Health care operations and maintenance would continue at the VA Hot Springs campus without major exterior modifications or additions to existing buildings. There are no floodplains or wetlands on the campus that could be impacted regardless of continued operations and maintenance.

There would be no changes to health care operations in Rapid City that would have any effect on floodplains or wetlands.

4.9.8 Supplemental Alternative G

4.9.8.1 Impacts from Construction

There are no floodplains or wetlands on the VA Hot Springs campus that could be impacted, regardless of possible renovations and modifications to campus buildings or construction of additional buildings to support a selected full or partial re-use of the campus.

4.9.8.2 Impacts from Operation

There are no floodplains or wetlands on the VA Hot Springs campus that could be impacted, regardless of the possible operational requirements of a selected full or partial re-use of the campus.

4.10 Socioeconomics

4.10.1 Evaluation Criteria

The socioeconomic analysis considers the economic conditions of the VA BHHCS service area in terms of population, housing, income, employment, and labor force. The evaluation includes a qualitative and quantitative analysis of various sources of data to predict reconfiguration-related impacts within the service area, with specific focus on Fall River County and Pennington County as the locations where the reconfiguration proposal would be implemented. An impact would be considered adverse if the reconfiguration would result in any of the following conditions:

- Displace populations, residents, or businesses to accommodate construction
- Generate an economic loss or gain without the capacity to absorb a decrease or increase
- Place a demand on suitable housing that exceeds availability
- Induce growth without adequate supporting infrastructure

The intensity of socioeconomic impacts can be determined by analyzing fluctuations in employment. Such an analysis provides a threshold beyond which changes in employment would noticeably affect individuals and communities in other areas such as housing, community services, schools, and revenues. Based on the trend in employment (see Table 3.10-5) shown in Figure 4.10-1, the average annual change calculated for Fall River County is -4.4 percent, with deviation between the annual change and average annual change ranging from 3.7 percent (difference between -4.4 and -0.7 percent) and -9.5 percent (difference between -4.4 and -13.9 percent). These threshold values represent the range within which Fall River County would have the capacity to absorb increases or decreases in socioeconomic conditions. Thus, a major impact for Fall River County would be an increase greater than 3.7 percent or a decline more than 9.5 percent. Similarly for Pennington County, the average annual change is 0.3 percent with the deviation ranging from 1.7 percent (difference between 0.3 and 2.0 percent) and -1.7 percent (difference between 0.3 and -2.0 percent). Therefore, a major impact for Pennington County would be an increase greater than 1.7 percent or a decline more than 1.7 percent.

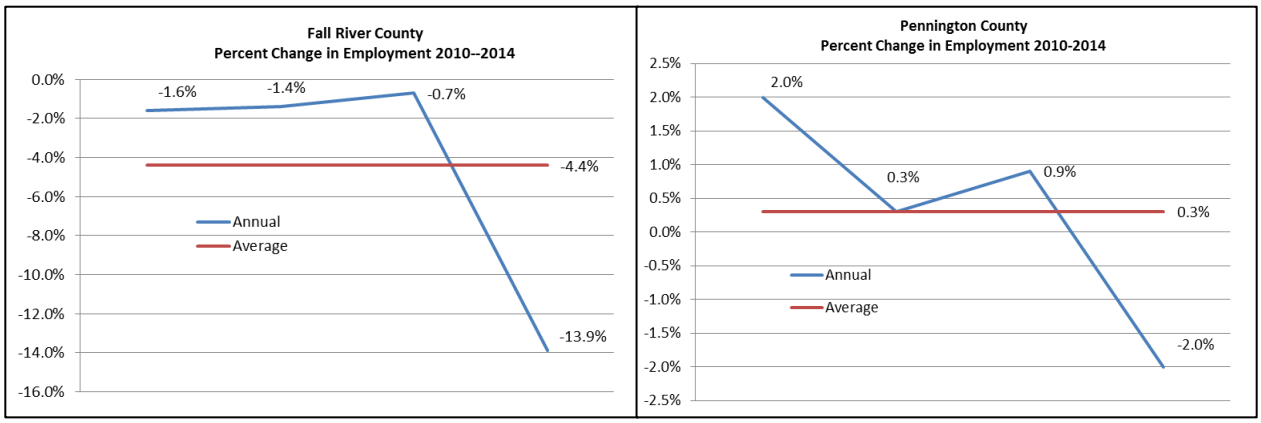

Figure 4.10-1. Employment Trend for Fall River County and Pennington County.

Implementation of any action alternative was estimated to occur over a five-year time period from design to completion. It is important to note that although actual construction activities (site

preparation, erection of structures, utilities installations, interior finishes, and landscaping) would probably take between two and three years, the time period used for analysis includes the ramp-up time to construction (site selection and acquisition, plans and designs) and transition time following construction to full operational status of the reconfiguration of services.

It is typical for project estimates to include costs for pre-design planning, architectural and engineering services, site acquisition, construction services, and contingencies. For this analysis, the project estimate is referred to as "construction costs". It is common for impact analyses to average the construction costs over the entire project time frame to discount the extremes in activity. Using an annual average presents the impacts of a project as a whole versus what the impacts would be during the first year, second year, and so on. Additionally, from a timing perspective, specific details of construction costs are not available on a year-by-year basis prior to completing project designs and bid estimates. The annual average is also the method by which action alternatives can be compared on a consistent basis.

4.10.2 Alternative A

4.10.2.1 Impacts from Construction

Construction of the proposed CBOC in Hot Springs and the proposed MSOC and RRTP in Rapid City was estimated to occur over a five-year time period from design to completion. During this time, there could be short-term impacts to employment, housing, and the local economy primarily connected to the number of construction workers.

The number of construction workers potentially needed to construct or lease facilities was determined by using wages and employee numbers from the construction sector for Fall River County (81 employees) and Pennington County (3,635 employees) (see Table 3.10-7) with the total estimated construction cost. A weighted average annual wage was first calculated using the percentage of construction workers from each county and the wage earned in that county to arrive at $42,211 per construction worker in the area. This wage would exceed the median household income (see Table 3.10-4) in Fall River County ($35,833) by approximately 17.8 percent, but it would be 9.9 percent less than the median household income in Pennington County ($46,849). A weighted average was used because the size of the construction sector in Fall River County alone is unlikely to provide the requisite number and skill of workers to complete the scale of construction proposed for Hot Springs. For example, the general contractor for the new State Veterans Home is based in Pennington County with construction and trade workers coming from outside Fall River County (D. Iverson, Scull Construction Services, personal communication, July 2015). The value of benefits (paid leave, insurance, retirement, social security, etc.) was then added to the weighted average annual wage of $42,211 to arrive at a total compensation cost. Benefits add 34 percent to the hourly wage for a construction worker (BLS 2015), putting the total compensation per construction worker at $56,563.

Labor generally accounts for approximately 40 percent of the total construction cost of a project (CLMA 2014). Therefore, the number of construction workers would be determined by dividing the 40 percent labor portion of the project construction cost by the total compensation cost per construction worker. A range of ±15 percent and an annual average over the five-year construction time period are used for analysis purposes. The number of annual average workers is not cumulative but reflects the level of employment that could be required to complete the construction. An annual

average was also used for analysis purposes because of the difficulty in determining fluctuations in numbers of workers due to different phases of construction.

Table 4.10-1 shows the total construction cost (JLL 2012a) to build new facilities or lease and renovate existing facilities in Hot Springs and Rapid City for Alternative A, and the number of construction workers needed. Leasing and renovating an existing facility generally takes less time to complete than constructing a new facility, but the same five-year time period from design to completion was used for purposes of this analysis.

Table 4.10-1. Construction Workers Estimated by Facility Construction Cost, Alternative A.

Construction Workers by Facility	Hot Springs		Rapid City	
	New	Lease	New	Lease
CBOC	$11,070,525	$642,243	--	--
MSOC, 100-bed RRTP	--	--	$71,655,425	$5,626,049
Labor (40% construction cost)	$4,428,210	$256,897	$28,662,170	$2,250,420
Total compensation per worker	$56,563	$56,563	$56,563	$56,563
Workers (labor/compensation)	78	5	507	40
Range of workers (±15%)	67-90	4-5	431-583	34-46
Annual average of workers over 5 years	13-18	1	86-117	7-10

Source: JLL 2012a (for facility construction cost).

4.10.2.1.1 Hot Springs

The annual average of 13 to 18 construction workers would add approximately 0.6 percent to the 2014 employment numbers for Fall River County (see Table 3.10-5). Because the number of annual workers is not cumulative, some of these workers would retain their employment year to year. Although the short-term impact to employment would be beneficial for the local economy, it would be negligible when compared to the evaluation criteria (Section 4.10.1).

There are no general contractors located in Hot Springs that are licensed to construct projects valued greater than $500,000 (Hot Springs 2013). Therefore, it was assumed that a general contractor available to construct the CBOC would be from outside Fall River County and would provide their own construction workers, but could also use some local construction or trade workers. Research shows that construction workers will commute as much as two hours one way from their residence rather than relocate (EPRI 1982). A general contractor and most construction workers from Pennington County would be within a two-hour commute; thus, impact to the local Hot Springs economy from construction of VA facilities would be primarily from the purchase of construction materials and supplies, gas, and food.

Construction workers residing outside a two-hour commute could occupy local housing or accommodations (hotel, campground/RV park) during the work week, and some could temporarily relocate to Fall River County depending on length of work assignment, current residence, and personal preference. There are 13 hotels in Hot Springs (Hot Springs 2015) and more than 900 housing units available in Fall River County (based on the total number of housing units and occupancy rate shown in Table 3.10-3). In the unlikely scenario that the 13 to 18 construction workers all occupied housing units, the number of available units would decrease by approximately

2.0 percent. The short-term impact to housing or hotel accommodations would be a minor beneficial impact to the local economy.

There would be no measurable impact to local employment, housing, or the economy from leasing and renovating an existing facility in Hot Springs for a CBOC. An annual average of one construction job would benefit the local economy but the impact would likely be unmeasurable.

4.10.2.1.2 Rapid City

The annual average of 86 to 117 construction workers would add approximately 0.2 percent to the 2014 employment numbers for Pennington County (see Table 3.10-5). Although the short-term impact to employment would be beneficial for the local economy, it would be negligible when compared to the evaluation criteria.

If a general contractor available to construct the MSOC and RRTP was located in Pennington County, it is assumed that many of the construction workers would also be located in Rapid City or other communities within the county. The 86 to 117 construction workers represent an average increase of 2.8 percent in construction sector employees in Pennington County (see Table 3.10-7). This would be a major increase in the construction sector employment in the county when compared to the evaluation criteria. However, the impact would only be adverse if the existing sector employees from Pennington County would not be available for construction of VA facilities without drawing on workers from nearby counties within a two-hour commute. Any construction workers residing outside a two-hour commute to Rapid City could occupy local housing or accommodations (hotel, campground/RV park) during the work week, or could temporarily relocate to Rapid City depending on length of work assignment, current residence, and personal preference. However, based on the assumption that a general contractor from Pennington County with their local workforce would construct the VA facilities, there would be a relatively low demand on available housing and accommodations. Any impact on the housing market or hotel accommodations from temporary occupancy by construction workers would be beneficial, but the impact would likely be unmeasurable.

Should a general contractor be from outside Pennington County with their own construction workers, there would be a short-term impact on local housing and hotel accommodations. There are over 5,400 hotel rooms in the Rapid City area (Rapid City 2015) and approximately 3,700 housing units available in Pennington County (based on the total number of housing units and occupancy rate shown in Table 3.10-3). If the 86 to 117 construction workers all occupied housing units, the number of available units would decrease by approximately 2.8 percent. This would be considered a major impact, which would be beneficial to the local housing market. Occupancy of approximately 2.0 percent of available hotel rooms would also be considered a major beneficial impact to the hotel industry.

There would be a negligible impact to local employment, housing, or the economy to lease and renovate an existing facility in Rapid City for an MSOC and RRTP. An average annual of 7 to 10 construction workers would likely be available in Pennington County and, although the construction would benefit the local economy, the impact would be negligible.

4.10.2.2 Impacts from Operation

Operational impacts would potentially affect local employment, housing, and income (wages), and ultimately the local economy. Change in the number and location of full-time equivalent employees (FTEEs) would be the primary source of socioeconomic impacts from operating the facilities under Alternative A. A change in wages associated with the change in FTEEs could affect local revenue that supports public services benefitting the community. Thus, impacts due to gain or loss in wages are tied to the county of residence of the wage earner and not the location of employment. Impacts to community services are described in Section 4.11.

Table 4.10-2 shows the FY 2014 FTEEs assigned to the VA Hot Springs campus and Rapid City CBOC by their county of residence and the proposed change in FTEEs to staff and operate the new VA BHHCS facilities in Hot Springs and Rapid City. **For purposes of analysis, the estimated change in FTEEs by county of residence was based strictly on the percentage of the total FY 2014 FTEEs currently assigned to the VA Hot Springs campus and Rapid City CBOC.** The actual change in FTEEs by county of residence at the time of implementation would result from operational decisions such as staffing needs (nurses, physicians, administrators, and other staff) and staff availability (location, recruitment, retirement, and other factors such as willingness to commute to another VA BHHCS facility). For example, the actual FTEE increase to staff the MSOC and RRTP in Rapid City could be filled by the FTEEs residing in Fall River County instead of new FTEEs residing in Pennington County.

VA BHHCS estimates 464 FTEEs would be eligible for retirement within the service area by FY 2020 (VA 2015). The 387 FTEEs assigned to the VA Hot Springs campus and Rapid City CBOC combined represent 36.2 percent of the 1,069 total FTEEs in the VA BHHCS. For purposes of this analysis, it is assumed that 168 of the retirement-eligible FTEEs (36.2 percent of 464) would be from VA facilities in Hot Springs and Rapid City. Thus, many of the proposed reductions in FTEEs at the VA Hot Springs campus could occur as retirements that could happen with or without the reconfiguration.

Implementation of the reconfiguration proposal was estimated to occur over a five-year time period. The gain or loss of FTEEs would be expected to occur over the same period; thus, for analysis purposes, the full gain or loss would be reached by the end of FY 2020.

Table 4.10-2. Change in Total FTEEs by County of Residence, Alternative A.

FTEE County of Residence	Hot Springs Campus FY 2014		Rapid City CBOC FY 2014		Hot Springs	Rapid City	Change 2014-2020
	FTEEs	% Total	FTEEs	% Total	-290 FTEEs	+98 FTEEs	Total FTEEs
Fall River	266	74.5%	0	0.0%	(216)	0	(216)
Pennington	39	10.9%	26	86.7%	(32)	85	53
Other[1]	52	14.6%	4	13.3%	(42)	13	(29)
Total	357	100.0%	30	100.0%	(290)	98	(192)

[1] Includes other counties within and outside the VA BHHCS service area.
Source: VA 2015.

An average annual wage was used to determine the gains or losses of total wages associated with the number of FTEEs proposed to staff and operate VA BHHCS facilities in Hot Springs and Rapid

City. This wage was calculated by using the total compensation of VA BHHCS employees for FY 2014, discounting 32 percent to account for benefits, and then dividing by the total number of FTEEs to arrive at an annual average wage of $65,939 per FTEE. The estimated change in total wages due to the reconfiguration proposal was calculated by county of residence for the FY 2014 FTEEs. The wages for Fall River County, Pennington County, and the other counties within and outside the service area were based strictly on the percentage of the total FTEEs currently assigned to the VA Hot Springs campus and Rapid City CBOC. For example, Table 4.10-2 shows 266 FTEEs assigned to the Hot Springs campus who reside in Fall River County. This represents 74.5 percent of the 357 total FTEEs assigned to the campus. Thus, 74.5 percent of the total change in wages associated with the change in FTEEs proposed for the VA Hot Springs campus would be assumed to affect Fall River County.

Table 4.10-3 shows the changes in wages to operate a new CBOC in Hot Springs and an MSOC and RRTP in Rapid City. Implementation of the reconfiguration proposal was estimated to occur over a five-year time period. The gain or loss of wages would therefore be expected to occur over the same period; thus, for analysis purposes, the full gain or loss would be reached by the end of FY 2020.

Table 4.10-3. Change in Total Wages by FTEE County of Residence, Alternative A.

FTEE County of Residence	Total Wages FY 2014	Hot Springs -290 FTEEs	Rapid City +98 FTEEs	Change in Wages	Total Wages FY 2020	Change 2014-2020
Fall River	$16,783,925	($14,247,959)	$0	($14,247,959)	$2,535,966	(84.9%)
Pennington	$14,510,058	($2,088,986)	$5,600,405	$3,511,419	$18,021,477	24.2%
Other[1]	$39,194,626	($2,785,315)	$861,600	($1,923,715)	$37,270,911	(4.9%)
Total	$70,488,609	($19,122,260)	$6,462,005	($12,660,255)	$57,828,354	(18.0%)

[1] Includes other counties within and outside the VA BHHCS service area.
Source: VA 2015 (for total FY 2014 wages, FTEEs).

4.10.2.2.1 Hot Springs

A new CBOC in Hot Springs would be staffed with 67 FTEEs, which would result in a reduction of 290 FTEEs from the FY 2014 total of 357 FTEEs. As shown in Table 4.10-2, there would be a reduction of 216 FTEEs residing in Fall River County over the five-year implementation time period. This would represent a decrease of 7.5 percent in employment in Fall River County (see Table 3.10-5). There would be a similar increase in the unemployment rate (see Table 3.10-6) from 4.6 to 11.8 percent if all 216 FTEEs became unemployed and remained in the labor force. Assuming the same distribution of FTEEs by county of residence, 116 of the 168 retirement-eligible FTEEs could reside in Fall River County. Thus, more than half of the FTEE reduction (116 of 216) could occur through retirement, with an overall decrease in Fall River County employment of 3.5 percent. There would be a similar increase in the unemployment rate from 4.6 to 7.9 percent if the other 100 FTEEs (216 minus 116) became unemployed and remained in the labor force. This change in Fall River County employment assumes none of the 216 FTEE reductions would occur via retirement, early retirement, buy-out, or a transfer to another position within the VA BHHCS service area. A reduction in employment and an increase in the unemployment rate would be adverse; however, the impact would be considered minor (with retirements) to moderate (without retirements) when compared to the evaluation criteria.

The reduction in FTEEs could have an effect on available housing and occupancy if the FTEEs relocated away from Fall River County. The reduction of 216 FTEEs would decrease the occupancy rate by 5.2 percentage points from 78.1 percent (see Table 3.10-3) to 72.9 percent. The reduction could be less (2.4 percentage points) if those FTEEs eligible for retirement remained in Fall River County or if the other FTEEs gained employment within commuting distance of their residences. A reduction in housing occupancy would be adverse; however, the impact would be considered minor (with retirements) to moderate (without retirements).

As shown in Table 4.10-3, wages of FTEEs residing in Fall River County would decrease by 84.9 percent over the five-year implementation time period. The reduction of $14.25 million in VA wages would represent a decrease of 18.6 percent in the total wages of $76.7 million for Fall River County (see Table 3.10-7), which would be a major impact. If the FTEE reduction is partially met by not replacing FTEEs eligible for retirement, the reduction in VA wages due to the proposal would be smaller by approximately $7.65 million (116 FTEEs x $65,939 annual wage), since it was assumed the retired FTEEs would have no additional wages. Therefore, the total reduction with retirements would be approximately $6.6 million, which represents a decrease of 8.6 percent in total county wages. Although the reduction in wages would be adverse, the impact would be considered moderate when compared to the evaluation criteria.

4.10.2.2.2 Rapid City

A new MSOC and RRTP in Rapid City would be staffed with 128 FTEEs, which would result in an additional 98 FTEEs from the FY 2014 total of 30 FTEEs. As shown in Table 4.10-2, there would be an increase of 53 FTEEs residing in Pennington County over the five-year implementation time period. This would represent a negligible change (0.1 percent increase) in employment in Pennington County (see Table 3.10-5) and a similar change in the unemployment rate. This change in Pennington County employment assumes none of the 53 FTEE additions would be filled by existing FTEEs residing in Fall River County. Assuming the same distribution of FTEEs by county of residence, 28 of the 168 retirement-eligible FTEEs could reside in Pennington County and would need to be replaced to operate the VA facilities in Rapid City. Any impact on Pennington County employment would be negligible regardless if the retirement-eligible FTEEs remained in the labor force.

The increase in FTEEs could affect available housing and occupancy. The increase of 53 FTEEs in Pennington County would increase the occupancy rate by 0.1 percentage points from 91.8 percent (see Table 3.10-3) to 91.9 percent. Any further increase would be negligible if those FTEEs eligible for retirement remained in Pennington County and replacement FTEEs resided in or within commuting distance of the county. Although an increase in housing occupancy would be beneficial, the impact would be considered negligible.

As shown in Table 4.10-3, wages of FTEEs residing in Pennington County would increase by 24.2 percent over the five-year implementation time period. On its own, this increase in wages from VA employment would be a major impact. However, as a percent of the total wages of $2.09 billion for Pennington County (see Table 3.10-7) the increase of $3.51 million (0.2 percent) in VA wages would be beneficial but negligible.

4.10.2.2.3 Other Counties

VA BHHCS employees reside in 20 other counties in addition to Fall River County and Pennington County. The other counties include 12 within the service area (9 South Dakota counties, 2 Nebraska counties, and 1 Wyoming county), and 8 outside the service, with the majority of the FTEEs residing in the South Dakota counties of Lawrence and Meade. There would be a reduction of 29 FTEEs residing in these other counties with an estimated reduction of $1.92 million (-4.9 percent) in VA wages (see Tables 4.10-2 and 4.10-3) to implement Alternative A in Hot Springs and Rapid City.

There would not likely be measurable changes in employment in these other counties because of the size of the total labor force (see Table 3.10-5), and no measurable change in the unemployment rate regardless if all 29 FTEEs became unemployed and remained in the labor force. Of the 168 retirement-eligible FTEEs assigned to the VA Hot Springs campus and Rapid City CBOC, 24 FTEEs would reside in these other counties. Thus, almost all of the FTEE reduction (24 of 29) proposed to implement the reconfiguration could occur through retirement, with an unmeasurable impact on employment, housing, and wages in these other counties.

4.10.3 Alternative B

4.10.3.1 Impacts from Construction

Construction of the proposed CBOC and RRTP in Hot Springs and the proposed MSOC in Rapid City is estimated to occur over a five-year time period from design to completion. During this time, there could be short-term impacts to employment, housing, and the local economy primarily connected to the number of construction workers.

Table 4.10-4 shows the total construction cost (JLL 2012a) to build new facilities or lease and renovate existing facilities in Hot Springs and Rapid City for Alternative B, and the annual average number of construction workers needed over the five-year time period.

Table 4.10-4. Construction Workers Estimated by Facility Construction Cost, Alternative B.

Construction Workers by Facility	Hot Springs		Rapid City	
	New	Lease	New	Lease
CBOC, 100-bed RRTP, fire station	$44,292,636	$3,938,441	--	--
MSOC	--	--	$42,026,299	$2,547,131
Labor (40% construction cost)	$17,717,054	$1,575,376	$16,810,520	$1,018,852
Total compensation per worker	$56,563	$56,563	$56,563	$56,563
Workers (labor/compensation)	313	28	297	18
Range of workers (±15%)	266-360	24-32	253-342	15-21
Annual average of workers over 5 years	53-72	5-6	51-68	3-4

Source: JLL 2012a (for facility construction cost).

4.10.3.1.1 Hot Springs

Construction of new facilities would have similar effects on local housing and accommodations as described for Alternative A, but the effects would be much greater because of the larger Hot Springs construction workforce.

The annual average of 53 to 72 construction workers would add approximately 2.2 percent to the 2014 employment numbers for Fall River County (see Table 3.10-5). Although the short-term impact to employment would benefit the local economy, it would be minor when compared to the evaluation criteria. A general contractor with their own construction workforce would be from outside Fall River County, but could also use some local construction or trade workers. Construction workers residing outside a two-hour commute from Hot Springs could occupy local housing or accommodations during the work week, and some could temporarily relocate to Fall River County depending on length of work assignment, current residence, and personal preference. Assuming the 53 to 72 construction workers all occupied housing units, the number of available units would decrease by an average of approximately 7.0 percent, a moderate short-term beneficial to the local housing market and economy. The more likely scenario would be far fewer workers occupying housing, with a smaller short-term beneficial impact.

Leasing and renovating existing facilities would have similar effects on local housing and accommodations as constructing new facilities described for Alternative A. However, the extent of the effects would be less because a smaller construction workforce would be needed for renovations as compared to new construction.

4.10.3.1.2 Rapid City

Construction would have similar effects on local employment, housing and accommodations, and the economy as described for Alternative A, but the extent of the effects would be less because of the smaller construction workforce needed for Alternative B.

The annual average of 51 to 68 construction workers would add approximately 0.1 percent to the 2014 employment numbers for Pennington County (see Table 3.10-5). Although the short-term impact to employment would benefit the local economy, it would be minor.

Based on the assumption that a general contractor from Pennington County would construct the MSOC, there would be relatively low to no demand on available housing and accommodations because the general contractor's workforce would likely reside within a two-hour commute.

The housing market and hotel accommodations would benefit from temporary occupancy by construction workers should the general contractor and their workforce be from outside Pennington County and reside more than two hours from Rapid City. In the unlikely scenario that the 51 to 68 construction workers all occupied housing units, the number of available units would decrease by approximately 2.0 percent. The short-term impact to housing availability would be considered major when compared to the evaluation criteria, but would benefit the local housing market and economy. Occupancy of approximately 1.0 percent of available hotel rooms would be a moderate beneficial impact to the hotel industry and local economy.

Leasing and renovating an existing facility for an MSOC would have similar effects on local housing and accommodations as described for Alternative A, but the extent of the effects would be less because a smaller construction workforce would be needed for renovations for Alternative B.

4.10.3.2 Impacts from Operation

Table 4.10-5 shows the FY 2014 FTEEs assigned to the VA Hot Springs campus and Rapid City CBOC by their county of residence and the proposed change in FTEEs to staff and operate the new

VA BHHCS facilities in Hot Springs and Rapid City for Alternative B. The assumptions used for analysis are the same as described in Section 4.10.2.2 for Alternative A.

Table 4.10-5. Change in Total FTEEs by County of Residence, Alternative B.

FTEE County of Residence	Hot Springs Campus FY 2014		Rapid City CBOC FY 2014		Hot Springs	Rapid City	Change 2014-2020
	FTEEs	% Total	FTEEs	% Total	-218 FTEEs	+26 FTEEs	Total FTEEs
Fall River	266	74.5%	0	0.0%	(162)	0	(162)
Pennington	39	10.9%	26	86.7%	(24)	23	(1)
Other[1]	52	14.6%	4	13.3%	(32)	3	(29)
Total	357	100.0%	30	100.0%	(218)	26	(192)

[1] Includes other counties within and outside the VA BHHCS service area.
Source: VA 2015.

Table 4.10-6 shows the changes in wages to operate a new CBOC and RRTP in Hot Springs and an MSOC in Rapid City. The assumptions used for analysis are the same as described in Section 4.10.2.2 for Alternative A.

Table 4.10-6. Change in Total Wages by FTEE County of Residence, Alternative B.

FTEE County of Residence	Total Wages FY 2014	Hot Springs -218 FTEEs	Rapid City +26 FTEEs	Change in Wages	Total Wages FY 2020	Change 2014-2020
Fall River	$16,783,925	($10,710,535)	$0	($10,710,535)	$6,073,390	(63.8%)
Pennington	$14,510,058	($1,570,342)	$1,485,822	($84,520)	$14,425,538	(0.6%)
Other[1]	$39,194,626	($2,093,789)	$228,588	($1,865,201)	$37,329,425	(4.8%)
Total	$70,488,609	($14,374,666)	$1,714,410	($12,660,256)	$57,828,353	(18.0%)

[1] Includes other counties within and outside the VA BHHCS service area.
Source: VA 2015 (for total FY 2014 wages, FTEEs).

4.10.3.2.1 Hot Springs

A new CBOC and 100-bed RRTP in Hot Springs would be staffed with 139 FTEEs, which would result in a reduction of 218 FTEEs from the FY 2014 total of 357 FTEEs. As shown in Table 4.10-5, there would be a reduction of 162 FTEEs residing in Fall River County over the five-year implementation time period. This would represent a decrease of 5.6 percent in employment in Fall River County (see Table 3.10-5). There would be a similar increase in the unemployment rate (see Table 3.10-6) from 4.6 to 10.0 percent if all 162 FTEEs became unemployed and remained in the labor force. Assuming the same distribution of FTEEs by county of residence, 116 of the 168 retirement-eligible FTEEs could reside in Fall River County. Thus, almost three-fourths of the FTEE reduction (116 of 162) could occur through retirement, with a smaller impact on Fall River County employment of -1.6 percent. There would be a similar increase in the unemployment rate from 4.6 to 6.1 percent if the other 46 FTEEs (162 minus 116) became unemployed and remained in the labor force. This change in Fall River County employment none of the 162 FTEE reductions would occur via retirement, early retirement, buy-out, or a transfer another position within the VA BHHCS service area. A reduction in employment and an increase in the unemployment rate would

be adverse; however, the impact would be considered minor (with retirements) to moderate (without retirements) when compared to the evaluation criteria.

The reduction in FTEEs could have an effect on available housing and occupancy. The reduction of 162 FTEEs in Fall River County would decrease the occupancy rate by 3.9 percentage points from 78.1 percent (see Table 3.10-3) to 74.2 percent. The reduction could be less (1.1 percentage points) if those FTEEs eligible for retirement remained in Fall River County or the other FTEEs remained employed within commuting distance of their residences. Although a reduction in housing occupancy would be adverse, the impact would be considered minor (with or without retirements).

As shown in Table 4.10-6, wages of FTEEs residing in Fall River County would decrease by 63.8 percent over the five-year implementation time period. The reduction of $10.71 million in VA wages would represent a decrease of 14.0 percent in the total wages of $76.7 million for Fall River County (see Table 3.10-7), which would be a major impact. If the FTEE reduction is partially met by not replacing FTEEs eligible for retirement, the reduction in wages due to the proposal would be smaller by approximately $7.65 million (116 FTEEs x $65,939 annual wage), since it was assumed the retired FTEEs would have no additional wages. The total reduction with retirements would therefore be $3.06 million, which would represent 4.0 percent of the total county wages. Although the reduction of wages would be adverse, the impact would be considered minor when compared to the evaluation criteria.

4.10.3.2.2 Rapid City

A new MSOC in Rapid City would be staffed with 56 FTEEs, which would result in an additional 26 FTEEs from the FY 2014 total of 30 FTEEs. As shown in Table 4.10-5, there would be a reduction of one FTEE residing in Pennington County over the five-year implementation time period, which would have no effect to employment or to the unemployment rate in Pennington County. Assuming the same distribution of FTEEs by county of residence, 28 of the 168 retirement-eligible FTEEs could reside in Pennington County and would need to be replaced to operate the VA facilities in Rapid City. This change in Pennington County employment assumes the one FTEE addition and retirement-eligible FTEEs would not be filled by existing FTEEs residing in Fall River County. Any impact on Pennington County employment would be unmeasurable regardless if the retirement-eligible FTEEs remained in the labor force.

The reduction of one FTEE would not affect available housing or the occupancy rate. Any effect would be negligible if those FTEEs eligible for retirement remained in Pennington County and replacement FTEEs resided in or within commuting distance of the county.

As shown in Table 4.10-6, wages of FTEEs residing in Pennington County would decrease by 0.6 percent over the five-year implementation time period. This reduction of $84,520 in wages from VA employment would be negligible as a percent of the total wages of $2.09 billion for Pennington County, and would be essentially offset if the FTEE reduction is met by not replacing an FTEE eligible for retirement.

4.10.3.2.3 Other Counties

There would be a reduction of 29 FTEEs residing in the other counties with an estimated reduction of $1.87 million (-4.8 percent) in VA wages to implement Alternative B in Hot Springs and Rapid

City. The impacts to employment, housing, and wages would be similar to the impacts described for Alternative A.

4.10.4 Alternative C

4.10.4.1 Impacts from Construction

Renovations to Building 12 and the domiciliary and construction of a new MSOC are estimated to occur over a five-year time period from design to completion. During this time, there could be short-term impacts to employment, housing, and the local economy primarily connected to the number of construction workers.

Table 4.10-7 shows the total construction cost (JLL 2012a) to renovate existing facilities on the VA Hot Springs campus and build new or lease existing facilities Rapid City for Alternative C, and the average annual number of construction workers needed over the five-year implementation period.

Table 4.10-7. Construction Workers Estimated by Facility Construction Cost, Alternative C.

Construction Workers by Facility	Hot Springs		Rapid City	
	Renovate	--	New	Lease
CBOC, 100-bed RRTP	$46,290,392	--	--	--
MSOC	--	--	$42,026,299	$2,547,131
Labor (40% construction cost)	$18,516,157	--	$16,810,520	$1,018,852
Total compensation per worker	$56,563	--	$56,563	$56,563
Workers (labor/compensation)	327	--	297	18
Range of workers (±15%)	278-376	--	253-342	15-21
Annual average of workers over 5 years	56-75	--	51-68	3-4

Source: JLL 2012a (for facility construction cost).

4.10.4.1.1 Hot Springs

Renovations to Building 12 and the domiciliary would have similar effects on local employment, housing and accommodations, and the economy as described for constructing new facilities for Alternative B because of the comparable number of annual average construction workers needed to complete the renovations.

4.10.4.1.2 Rapid City

The proposed construction of new facility or lease and renovation of an existing facility for an MSOC would be the same as Alternative B, so impacts on employment, local housing and accommodations, and the economy would be the same as described for Alternative B.

4.10.4.2 Impacts from Operations

4.10.4.2.1 Hot Springs

The VA Hot Springs campus would be staffed with 139 FTEEs, which would result in a reduction of 218 FTEEs from the FY 2014 total of 357 FTEEs. The FTEEs to operate a renovated Building 12 as a CBOC and a renovated domiciliary for a 100-bed RRTP would be the same as Alternative B.

Reductions in FTEEs and wages would have the same impacts on local employment, housing, income, and the economy as the impacts described for Alternative B.

4.10.4.2.2 Rapid City

Operation of a new MSOC in Rapid City would be staffed with 56 FTEEs, which would result in an additional 26 FTEEs from the FY 2014 total of 30 FTEEs. The increase in FTEEs and wages to operate a new MSOC would be the same as Alternative B, so impacts on employment, housing, income, and the economy would be the same as described for Alternative B.

4.10.4.2.3 Other Counties

The reduction in FTEEs and wages in the other counties throughout the VA BHHCS service area would be the same as Alternative B, so impacts on employment, housing, income, and the economy would be the same as described for Alternative B.

4.10.5 Alternative D

4.10.5.1 Impacts from Construction

Construction of the proposed CBOC and 24-bed RRTP in Hot Springs and the proposed MSOC and 76-bed RRTP in Rapid City is estimated to occur over a five-year time period from design to completion. During this time, there could be short-term impacts to employment, housing, and the local economy primarily connected to the number of construction workers.

Table 4.10-8 shows the total construction cost (JLL 2012a) to build new facilities or lease and renovate existing facilities in Hot Springs and Rapid City for Alternative D, and the annual average number of construction workers needed over the five-year implementation period.

Table 4.10-8. Construction Workers Estimated by Facility Construction Cost, Alternative D.

Construction Workers by Facility	Hot Springs		Rapid City	
	New	Lease	New	Lease
CBOC, 24-bed RRTP, fire station	$24,959,425	$2,268,370	--	--
MSOC, 76-bed RRTP	--	--	$66,810,520	$5,109,048
Labor (40% construction cost)	$9,983,770	$907,348	$26,772,303	$2,043,619
Total compensation per worker	$56,563	$56,563	$56,563	$56,563
Workers (labor/compensation)	177	16	473	36
Range of workers (±15%)	150-203	14-18	402-544	31-42
Annual average of workers over 5 years	30-41	3-4	80-109	6-8

Source: JLL 2012a (for facility construction cost).

4.10.5.1.1 Hot Springs

Construction of new facilities would have similar effects on local employment, housing and accommodations, and the economy as described for Alternative B, but the extent of the effects would be less because of the smaller construction workforce needed for Alternative D.

The annual average of 30 to 41 construction workers would add approximately 1.2 percent to the 2014 employment numbers for Fall River County (see Table 3.10-5). Although the short-term impact to employment would benefit the local economy, it would be minor when compared to the evaluation criteria.

A general contractor with their own construction workforce would be from outside Fall River County, but could also use some local construction or trade workers. Construction workers residing outside a two-hour commuting distance from Hot Springs could occupy local housing or accommodations during the work week, and some could temporarily relocate to Fall River County depending on length of work assignment, current residence, and personal preference. Assuming the 30 to 41 construction workers all occupied housing units, the number of available units would decrease by an average of approximately 4.0 percent, a moderate short-term beneficial impact to the local housing market and economy. The more likely scenario would be far fewer workers occupying housing, with a smaller short-term beneficial impact.

Leasing and renovating existing facilities would have similar effects on local employment, housing and accommodations, and the economy as described for Alternative B, but the extent of the effects could be slightly less because a smaller construction workforce would be needed for renovations.

4.10.5.1.2 Rapid City

The proposed construction of new facilities or lease and renovation of existing facilities would have similar effects on local employment, housing and accommodations, and the economy as described for Alternative A, but the extent of the effects could be slightly less because of the slightly smaller construction workforce needed for Alternative D.

4.10.5.2 Impacts from Operation

Table 4.10-9 shows the FY 2014 FTEEs assigned to the VA Hot Springs campus and Rapid City CBOC by their county of residence and the proposed change in FTEEs to staff and operate the new VA BHHCS facilities in Hot Springs and Rapid City for Alternative D. The assumptions used for analysis are the same as described in Section 4.10.2.2 for Alternative A.

Table 4.10-9. Change in Total FTEEs by County of Residence, Alternative D.

FTEE County of Residence	Hot Springs Campus FY 2014		Rapid City CBOC FY 2014		Hot Springs	Rapid City	Change 2014-2020
	FTEEs	% Total	FTEEs	% Total	-270 FTEEs	+88 FTEEs	Total FTEEs
Fall River	266	74.5%	0	0.0%	(201)	0	(201)
Pennington	39	10.9%	26	86.7%	(30)	76	46
Other[1]	52	14.6%	4	13.3%	(39)	12	(27)
Total	357	100.0%	30	100.0%	(270)	88	(182)

[1] Includes other counties within and outside the VA BHHCS service area.
Source: VA 2015.

Table 4.10-10 shows the changes in wages to operate a new CBOC and 24-bed RRTP in Hot Springs and an MSOC and 76-bed RRTP in Rapid City. The assumptions used for analysis are the same as described in Section 4.10.2.2 for Alternative A.

Table 4.10-10. Change in Total Wages by FTEE County of Residence, Alternative D.

FTEE County of Residence	Total Wages FY 2014	Hot Springs -270 FTEEs	Rapid City +88 FTEEs	Change in Wages	Total Wages FY 2020	Change 2014-2020
Fall River	$17,930,497	($13,265,341)	$0	($13,265,341)	$3,518,584	(79.0%)
Pennington	$14,369,104	($1,944,918)	$5,028,935	$3,084,016	$17,594,074	(21.3%)
Other[1]	$38,189,008	($2,593,225)	$773,682	($1,819,542)	$37,375,084	(4.6%)
Total	$70,488,609	($17,803,484)	$5,802,617	($12,000,867)	$58,487,742	(17.0%)

[1] Includes other counties within and outside the VA BHHCS service area.
Source: VA 2015 (for total FY 2014 wages, FTEEs).

4.10.5.2.1 Hot Springs

A new CBOC and 24-bed RRTP in Hot Springs would be staffed with 87 FTEEs, which would result in a reduction of 270 FTEEs from the FY 2014 total of 357 FTEEs. As shown in Table 4.10-9, there would be a reduction of 201 FTEEs residing in Fall River County over the five-year implementation time period. This would represent a decrease of 7.0 percent in employment in Fall River County. There would be a similar increase in the unemployment rate from 4.6 to 11.3 percent if all 201 FTEEs became unemployed and remained in the labor force. Assuming the same distribution of FTEEs by county of residence, 116 of the 168 retirement-eligible FTEEs could reside in Fall River County. Thus, more than half of the FTEE reduction (116 of 201) could occur through retirement, with an overall decrease in Fall River County employment of 2.9 percent. There would be a similar increase in the unemployment rate from 4.6 to 7.4 percent if the other 85 FTEEs (201 minus 116) became unemployed and remained in the labor force. This change in Fall River County employment assumes none of the 201 FTEE reductions would occur via retirement, early retirement, buy-out, or a transfer to another position within the VA BHHCS service area. A reduction in employment and an increase in the unemployment rate would be adverse; however, the impact would be considered minor (with retirements) to moderate (without retirements) when compared to the evaluation criteria.

The reduction in FTEEs could have an effect on available housing and occupancy if the FTEEs relocated away from Fall River County. The reduction of 201 FTEEs would decrease the occupancy rate by 4.8 percentage points from 78.1 percent to 73.3 percent. The reduction could be less (2.0 percentage points) if those FTEEs eligible for retirement remained in Fall River County or if the other FTEEs gained employment within commuting distance of their residences. A reduction in housing occupancy would be adverse; however, the impact would be considered minor (with retirements) to moderate (without retirements).

As shown in Table 4.10-10, wages of FTEEs residing in Fall River County would decrease by 79.0 percent over the five-year implementation time period. The reduction of $13.27 million in VA wages would represent a decrease of 17.3 percent in the total wages of $76.7 million for Fall River County, which would be a major impact. If the FTEE reduction is partially met by not replacing FTEEs eligible for retirement, the reduction in VA wages would be smaller by approximately $7.65 million (116 FTEEs x $65,939 annual wage), since it was assumed the retired FTEEs would have no additional wages. The total reduction with retirements would therefore be $5.62 million, which would amount to 7.3 percent of the total county wages. Although the reduction of VA wages would be adverse, the impact would be considered moderate when compared to the evaluation criteria.

4.10.5.2.2 Rapid City

A new MSOC and 76-bed RRTP in Rapid City would be staffed with 118 FTEEs, which would result in an additional 88 FTEEs from the FY 2014 total of 30 FTEEs. As shown in Table 4.10-9, there would be an increase of 46 FTEEs residing in Pennington County over the five-year implementation period. This would represent a negligible change (0.1 percent increase) in employment in Pennington County, with a similar change in the unemployment rate. This change in Pennington County employment assumes none of the 46 FTEE additions would be filled by existing FTEEs residing in Fall River County. Assuming the same distribution of FTEEs by county of residence, 28 of the 168 retirement-eligible FTEEs could reside in Pennington County and would need to be replaced to operate the VA facilities in Rapid City. Any impact on Pennington County employment would be negligible regardless if the retirement-eligible FTEEs remained in the labor force.

The increase of 46 FTEEs would have a similar effect on available housing and occupancy as described for Alternative A (increase of 53 FTEEs).

As shown in Table 4.10-10, wages of FTEEs residing in Pennington County would increase by 21.3 percent over the five-year implementation time period. On its own, this increase in wages from VA employment would be a major impact. However, as a percent of the total wages of $2.09 billion for Pennington County the increase of $3.08 million (0.1 percent) in VA wages would be beneficial but negligible.

4.10.5.2.3 Other Counties

There would be a reduction of 27 FTEEs residing in the other counties with an estimated reduction of $1.82 million (-4.6 percent) in VA wages to implement Alternative D in Hot Springs and Rapid City. The impacts to employment, housing, and wages would be similar to the impacts described for Alternative A (29 FTEE reductions, $1.92 million fewer wages).

4.10.6 Alternative E

4.10.6.1 Impacts from Construction

Renovations and additions to Building 12 to expand inpatient/outpatient care, and renovations to the domiciliary and construction of a new facility for a total of 200 beds are estimated to occur over a five-year time period from design to completion. During this time, there could be short-term impacts to employment, housing, and the local economy primarily connected to the number of construction workers. No construction or renovations are proposed to the CBOC in Rapid City under this alternative.

Table 4.10-11 shows the total construction cost (JLL 2012b) to renovate existing facilities and build new facilities on the VA Hot Springs campus for Alternative E, and the annual average number of construction workers needed over the five-year implementation period.

Table 4.10-11. Construction Workers Estimated by Facility Construction Cost, Alternative E.

Construction Workers by Facility	Hot Springs
	Renovate / Construct
Inpatient/outpatient, 200-bed RRTP	$100,176,540
Labor (40% construction cost)	$40,070,616
Total compensation per worker	$56,563
Workers (labor/compensation)	708
Range of workers (±15%)	602-815
Annual average of workers over 5 years	120-163

Source: JLL 2012b (for facility construction cost).

Constructing new facilities and renovating existing facilities on the VA Hot Springs campus would have similar effects on local employment, housing and accommodations, and the economy as described for Alternatives B and C; however, the extent of the effects would be greater because of the larger construction workforce needed for Alternative E.

The annual average of 120 to 163 construction workers would add approximately 4.9 percent to the 2014 employment numbers for Fall River County (see Table 3.10-5). This would be considered a minor short-term beneficial impact to employment when compared to the evaluation criteria.

A general contractor with their own construction workforce would be from outside Fall River County, but could also use some local construction or trade workers. Construction workers residing outside a two-hour commute from Hot Springs could occupy local housing or accommodations during the work week, and some could temporarily relocate to Fall River County depending on length of work assignment, current residence, and personal preference. In the unlikely scenario that the 120 to 163 construction workers all occupied housing units, the number of available units would decrease by an average of approximately 15.0 percent. This would be considered a short-term major impact that would benefit the local housing market and economy. Hotel occupancy rates (South Dakota 2014) indicate that hotels could accommodate an increase in demand, which would also benefit the local economy.

4.10.6.2 Impacts from Operation

Table 4.10-12 shows the FY 2014 FTEEs assigned to the VA Hot Springs campus by their county of residence and the proposed change in FTEEs to staff and operate the expanded facilities on the campus for Alternative E. The assumptions used for analysis are the same as described in Section 4.10.2.2 for Alternative A. No change in staffing is proposed to operate the CBOC in Rapid City under this alternative.

Table 4.10-12. Change in Total FTEEs by County of Residence, Alternative E

FTEE County of Residence	Hot Springs Campus FY 2014		Hot Springs	Change 2014-2020
	FTEEs	% Total	+276 FTEEs	FTEEs
Fall River	266	74.5%	206	206
Pennington	39	10.9%	30	30
Other[1]	52	14.6%	40	40
Total	357	100.0%	276	276

[1] Includes other counties within and outside the VA BHHCS service area.
Source: VA 2015.

Table 4.10-13 shows the changes in wages to operate the expanded VA Hot Springs campus. The assumptions used for analysis are the same as described in Section 4.10.2.2 for Alternative A.

Table 4.10-13. Change in Total Wages by FTEE County of Residence, Alternative E

FTEE County of Residence	Total Wages FY 2014	Hot Springs +276 FTEEs	Total Wages FY 2020	Change 2014-2020
Fall River County	$17,930,497	$13,560,127	$30,344,052	80.8%
Pennington County	$14,369,104	$1,988,139	$16,498,197	13.7%
Other Counties	$38,189,008	$2,650,852	$41,845,478	6.8%
Total	$70,488,609	$18,199,118	$88,687,727	25.8%

[1] Includes other counties within and outside the VA BHHCS service area.
Source: VA 2015 (for total FY 2014 wages, FTEEs).

4.10.6.2.1 Hot Springs

An expanded campus in Hot Springs would be staffed with 633 FTEEs, which would result in an additional 276 FTEEs from the FY 2014 total of 357 FTEEs. As shown in Table 4.10-12, there would be an increase of 206 FTEEs residing in Fall River County over the five-year implementation time period. This would represent an increase of 7.1 percent in employment in Fall River County (see Table 3.10-5), which would be a major impact. There would be a similar decrease in the unemployment rate (see Table 3.10-6) by 6.8 percentage points from 4.6 to -2.2 percent if all new employees were already Fall River County residents. A negative unemployment rate means there are not enough employable persons available to fill jobs. An increase in employment and a decreased unemployment rate would be beneficial to a point, but then could become an adverse impact.

As shown in Table 3.10-6, there were 140 unemployed persons in Fall River County in 2014. In the unlikely scenario those 140 persons could fill the 206 FTEEs needed to implement Alternative E, another 66 employable persons (206 minus 140) would have to either relocate to Fall River County or change jobs in the county. Assuming the same distribution of FTEEs by county of residence, 116 of the 168 retirement-eligible FTEEs could reside in Fall River County. Thus, an additional (replacement) 116 FTEEs from Fall River County could be needed to implement Alternative E. These 322 FTEEs (206 plus 116) would represent an increase of 11.2 percent in county employment with a similar decrease in the unemployment rate of 10.6 percentage points from 4.6 to -6.0 percent, which would be a major impact. Generally, an increase in employment and a decrease in the unemployment rate are viewed as beneficial. However, the impact would be potentially adverse to the City of Hot Springs if it lacks sufficient supporting infrastructure (particularly housing, but also

schools and other community services) to absorb the increase, and to the city and VA BHHCS if the local labor force does not offer enough capacity in the employment sectors assumed to be needed to implement Alternative E. Insufficient labor capacity could result in competition with other Hot Springs employers for candidates, as well as provide a challenge for VA in staffing positions without relocating people to the area.

The increase in FTEEs could have an effect on available housing and occupancy. The increase of 206 FTEEs in Fall River County would increase the occupancy rate by 4.9 percentage points from 78.1 percent (see Table 3.10-3) to 83.0 percent, which would be a major impact. The increase could be greater at 7.7 percentage points (85.8 percent occupancy) if those FTEEs eligible for retirement remained in Fall River County, or the additional (replacement) 116 FTEEs preferred or needed to relocate to Hot Springs based on their current location of residence. A major increase in housing occupancy would generally be considered beneficial based on the assumption that available housing units would be suitable and accommodate occupiers' preferences.

As shown in Table 4.10-13, wages of FTEEs residing in Fall River County would increase by 80.8 percent over the five-year implementation time period. As a percent of the total wages of $76.7 million for Fall River County (see Table 3.10-7), an increase of $13.56 million in VA wages would amount to a 17.7 percent increase in the total county wages. The increase in wages would be considered major and beneficial.

4.10.6.2.2 Rapid City

Although no change in staffing is proposed to operate the CBOC in Rapid City, the substantial increase in FTEEs to implement Alternative E in Hot Springs would have an effect in Pennington County on housing, income, and the local economy. As shown in Table 4.10-12, there would be an additional 30 FTEEs residing in Pennington County over the five-year implementation time period. Because of the retirement-eligible FTEEs, an additional (replacement) 28 FTEEs from Pennington County could be needed to implement Alternative E in Hot Springs. This number of FTEEs would not result in a measurable change in employment in Pennington County or a measurable change in the unemployment rate because of the size of the labor force in the county. The impact on employment and housing would be similar to but less than the impact described for Alternative D (increase of 46 FTEEs).

As shown in Table 4.10-13, wages of FTEEs residing in Pennington County would increase by 13.7 percent ($1.99 million) over the five-year implementation time period. The beneficial impact on income (VA wages) and the local economy would be similar to but slightly greater than the impact described for Alternative D (increase of $1.82 million in wages).

4.10.6.2.3 Other Counties

There would be an increase of 40 FTEEs residing in counties other than Fall River and Pennington, with an estimated increase of $2.65 million in wages to implement Alternative E in Hot Springs. Even with the increases, there would not likely be measurable changes in employment in these other counties because of the size of the total labor force, and no measurable change in the unemployment rate. Because of the retirement-eligible FTEEs, an additional (replacement) 24 FTEEs from these other counties could be needed to implement this alternative. These 64 FTEEs (40 plus 24) could slightly increase employment in some of these counties with a similar decrease in

the unemployment rate; however, the changes would not likely be measureable but would be beneficial.

The increase in FTEEs in these other counties could increase the housing occupancy rate; however, changes to the rates would not likely be measureable because of the number of available units in these counties (see Table 3.10-3). Although an increase in housing occupancy would be beneficial, the impact would be negligible.

As shown in Table 4.10-13, wages of FTEEs residing in these other counties would increase by 6.8 percent over the five-year implementation time period. This increase in VA wages would be a beneficial impact, and depending on the amount compared against the total wages of a particular county, the impact could be measurable but likely negligible.

4.10.7 Alternative F

4.10.7.1 Impacts from Construction

Buildings on the VA Hot Springs campus would be renovated and modified to maintain clinical standards. Renovations would be scheduled under the routine budget process. For purposes of this analysis, it was unrealistic to assume the routine budget process would provide sufficient funds to accomplish the long-term renovations of the "no action alternative" during the same five-year time period proposed to implement an "action alternative" that supports reconfiguration of services within five years. A more realistic time period would be closer to 20 years; however, for this analysis a 10-year time period was used for the baseline by which to compare the action alternatives.

There could be short-term impacts to employment, housing, and the local economy primarily connected to the number of construction workers. No construction or renovations are proposed for the CBOC in Rapid City under this alternative. Table 4.10-14 shows the total construction cost (JLL 2012a) to renovate facilities on the VA Hot Springs campus for Alternative F, and the annual average number of construction workers needed over a 10-year time period.

Table 4.10-14. Construction Workers Estimated by Facility Construction Cost, Alternative F.

Construction Workers by Facility	Hot Springs
	Renovate / Maintain
Inpatient/outpatient, 100-bed RRTP	$63,184,331
Labor (40% construction cost)	$25,273,732
Total compensation per worker	$56,563
Workers (labor/compensation)	447
Range of workers (±15%)	380-514
Annual average of workers over 10 years	38-51

Source: JLL 2012a (for facility construction cost).

The annual average of 38 to 51 construction workers would add approximately 1.6 percent to the 2014 employment numbers for Fall River County (see Table 3.10-5). Although the short-term impact to employment would benefit the local economy, it would be minor when compared to the evaluation criteria. Similar to the other alternatives, a general contractor with their own construction workforce would be from outside Fall River County, but could also use some local construction or

trade workers. Construction workers residing outside a two-hour commute from Hot Springs could occupy local housing or accommodations during the work week, which would benefit the local economy. In the unlikely scenario that the 38 to 51 construction workers all occupied housing units, the number of available units would decrease by an average of approximately 5.5 percent. This would be considered a short-term moderate impact that would benefit the local housing market and economy. Hotel occupancy rates (South Dakota 2014) indicate that hotels could accommodate an increase in demand, which would also benefit the local economy.

4.10.7.2 Impacts from Operation

Operation of the VA Hot Springs campus and Rapid City CBOC would continue with the FTEEs assigned to these facilities (see Table 3.10-8). Any changes to employment, housing, and wages for continued operation of these facilities would be negligible.

4.10.8 Supplemental Alternative G

4.10.8.1 Impacts from Construction

Supplemental Alternative G involves full or partial re-use of the VA Hot Springs campus and could only happen with implementation of Alternatives A, B, C, or D. If a potential re-use included renovations or modifications to buildings or construction of additional buildings on the campus, construction-related impacts to local employment, housing and accommodations, and the economy could likely be similar to the impacts described for Alternatives C and E. However, the extent of the impacts would depend on the total construction value of the renovations and modifications, and the time period over which the construction would occur.

4.10.8.2 Impacts from Operation

The type of re-use of the VA Hot Springs campus would determine the extent of effects to employment, housing, income, and ultimately the economy. The extent of any impacts would depend on the scope and scale of the re-use and the employment workforce it would need; however, the impacts could likely be similar to those described for Alternatives C and E.

4.11 Community Services

4.11.1 Evaluation Criteria

The evaluation of impacts on community services focused on the availability of and demand for educational, medical, public safety and protection, and recreational services. The evaluation involved a qualitative analysis of the operational capacity of and funding for providing such services, with specific focus on Hot Springs and Rapid City as the locations where physical facilities would be changed to implement the reconfiguration proposal. An adverse effect on community services is identified under any of the following conditions:

- Change in the number of users of community services that exceed existing capacity
- Change in the demand for emergency and public protection services that would increase response times based on existing personnel resources and equipment
- Change in the funding needed to sustain services or to increase access to services

The demand for and use of community services is based on the population served; therefore, changes in demand and use depend on changes in that population. The alternatives would change the population through changes in employment. Therefore, the magnitude of impacts on community services can be determined by analyzing fluctuations in employment, as estimated in the analysis for impacts on socioeconomics (see Section 4.10.1 Evaluation Criteria). This analysis provides a threshold beyond which changes in employment would noticeably affect the community. A noticeable impact to community services offered in Hot Springs (based on data for Fall River County) would result from an increase greater than 3.7 percent or a decrease more than 9.5 percent in users, response times, or funding. For Rapid City (based on data for Pennington County) the noticeable impact would be an increase greater than 1.7 percent or a decrease more than 1.7 percent.

A change in wages associated with a change in FTEEs could affect local revenue used to support public services that benefit the community. Thus, impacts due to a gain or loss in wages are tied to the county of residence of the wage earner and not the location of employment. Local government decisions regarding funding for community services generally place a higher priority on public safety and less on recreation or other "non-essential" governmental functions. Decreases in revenues often result in disproportionate reductions in "non-essential" services to allow for the continued adequate funding of public safety and other "essential" services.

4.11.2 Alternative A

4.11.2.1 Impacts from Construction

Construction of the proposed CBOC in Hot Springs and the proposed MSOC and RRTP in Rapid City could have short-term impacts to public safety and protection services. Construction sites can be sources of accidents involving workers, equipment, and materials; attract theft and vandalism; and create safety hazards for persons not authorized to enter the site. Such incidents would have the potential to increase the number of calls for responses by emergency medical providers, fire departments (FDs), or police departments (PDs). General contractors minimize the occurrence of these types of incidents by properly maintaining construction equipment and implementing "good housekeeping" procedures to prevent fire ignition, educating construction workers in Occupational Safety and Health Administration-required safety standards, and securing and monitoring the

construction site. In addition, the general contractor would be required to follow VA Construction Specification Section 01-35-26 "Safety Requirements" and prepare and implement an accident prevention plan and fire safety plan, and Section 01-00-00 "General Requirements, Construction Security" and prepare a plan to secure the site. With these procedures and plans to manage accident, fire, and security risks, any increase in requests for emergency response by medical, fire, or police would not likely exceed the capacity of these providers in either Hot Springs or Rapid City. The VA Hot Springs FD, through the mutual aid agreement with the Hot Springs Volunteer Fire Department (VFD), would provide firefighting assistance as necessary.

Construction activities that temporarily close or restrict travel lanes or designate a detour, along with slow-moving construction traffic, could potentially affect emergency vehicle (medical, fire, and police) response times. Access to buildings adjacent to the construction sites would be maintained for fire trucks and emergency vehicles; however, construction vehicles and haul trucks near the sites could reduce traffic flows and delay emergency vehicles traveling through the area. Traffic control plans would be prepared and shared with emergency response providers, as required by the local public works/engineering departments in Hot Springs and Rapid City.

The numbers of workers associated with the construction of VA facilities in either community would not likely cause an increase in student enrollment high enough to affect average student-to-staff ratios in the Hot Springs and Rapid City school districts. The estimated yearly average of 13 to 18 construction workers would not be expected to relocate to Hot Springs (see Section 4.10.2.1.1). However, should some of these workers have school-age children and choose to temporarily relocate, the capacity of the Hot Springs School District would not be impacted based on enrollment trends and student-to-staff ratios over the past five years (see Tables 3.11-1 and 3.11-2). The estimated yearly average of 86 to 117 workers that would be needed for construction in Rapid City would likely already reside in the local area (see Section 4.10.2.1.2); thus, there would be no measurable impact on student enrollment in the Rapid City School District. However, should there be a temporary influx of some construction workers with school-age children the capacity of the Rapid City School District would not be impacted based on trends in enrollment and student-to-staff ratios over the past five years (see Tables 3.11-4 and 3.11-5).

The temporary influx of a few construction workers to Hot Springs would not be expected to substantially increase the usage of city parks or place excess demand on recreational facilities. Many of the workers in Rapid City would be expected to already reside in the area; thus, construction-related impacts on parks and recreation facilities would be negligible.

4.11.2.2 Impacts from Operation

The reduction of approximately 216 FTEEs whose residence is Fall River County and the addition of 53 FTEEs whose residence is Pennington County (see Table 4.10-2) would reduce VA wages by approximately $14.25 million in Fall River County and increase VA wages by $3.51 million in Pennington County (see Table 4.10-3) over the five-year implementation time period. The reduction in VA wages would be moderate when compared to total wages earned in Fall River County and minor when retirement-eligible FTEEs and wages are included (see Section 4.10.2.2.1). The increase in VA wages would be negligible when compare to total wages earned in Pennington County (see Section 4.10.2.2.2). Local sources of funding for FDs, emergency medical services, PDs, schools, and parks are predominantly property and sales taxes. Property taxes would not be affected by reduction in FTEEs and wages because the tax would still be paid regardless if the property is

occupied. The increase in FTEEs in Pennington County would have a negligible impact on housing and thus a negligible impact on property taxes. Fall River County could experience a minor to moderate decrease in sales tax revenue, whereas a negligible increase in sales tax revenue could occur in Pennington County.

The VA Hot Springs campus is federal government property on federal land owned by VA. It is not defined as "entitlement land" under the *Payments in Lieu of Taxes Act* (31 U.S.C. 69); therefore, Fall River County does not receive federal payments associated with the VA campus to offset losses in property taxes that fund community services.

4.11.2.2.1 Hospitals and Clinics

The reconfiguration proposal would increase options for Veterans to choose to receive care from non-VA providers at clinics and hospitals in their local communities throughout the VA BHHCS service area. The projected operating cost for non-VA care was estimated to increase approximately 19.9 percent from $25.9 million to $31.0 million (VA 2012). This would be a major increase in health care services provided by non-VA clinics and hospitals based on the evaluation criteria. Because the care would be provided at a number of different locations and would be a mutually agreeable service between VA BHHCS and the clinic or hospital, any impact on the capacity of facilities to provide service would be negligible.

4.11.2.2.2 Fire/Rescue, Emergency Medical, and Law Enforcement Services

The demand for fire protection, emergency medical services, and police protection is closely linked to the size of the population served. The operation of a new CBOC in Hot Springs and an MSOC and RRTP in Rapid City would result in the reduction of approximately 216 FTEEs whose residence is Fall River. Implementation of the reconfiguration proposal was estimated to occur over five years, so the reduction of FTEEs would be reached by the end of FY 2020. If these 216 FTEEs all relocated from Hot Springs, the projected 2020 population of Fall River County (see Table 3.10-1) would decrease by 2.9 percent, which would be a minor impact. The decrease would be less (1.4 percent) but still minor if the FTEE reduction was partially met by the 116 retirement-eligible FTEEs and if they continued to reside in the county. The addition of 53 FTEEs to Rapid City would have no measurable change to the projected 2020 population of Pennington County. There would be no additional demand that would exceed the capacity of fire or police protection response or emergency medical services because of changes in VA staff levels to operate VA facilities in either Hot Springs or Rapid City.

VA BHHCS would no longer staff and operate the VA Hot Springs FD since there would not be 24-hour inpatient care at the campus or the new CBOC. VA Hot Springs FD has only received two or three requests from the Hot Springs VFD for firefighting assistance under the mutual aid agreement over the past couple of years. Ending the VA Hot Springs FD operations and relocating fire equipment from the VA campus would have a negligible impact on the fire response within the community by the Hot Springs VFD. There are numerous other century-old sandstone buildings in Hot Springs, so including the similar type buildings on the vacated VA campus within the response area of the Hot Springs VFD should not impact the capacity of the VFD to provide fire protection services.

The location and operation of an MSOC and RRTP would be within the response area of the Rapid City FD. The department is staffed 24 hours a day by professional firefighters at seven fire stations.

The department has developed a plan and increased annual budgets to add staffing to address the growth and development occurring in the response area (RCFD 2015; Rapid City 2015). The Rapid City FD can provide the response time requirements for VA facilities with 24-hour patient care, eliminating the need for VA BHHCS to staff and operate an FD to support the MSOC and RRTP. The VA facilities would be comparable to facilities and land uses in planned growth areas where the Rapid City FD would provide services; thus, operating an MSOC and RRTP would not exceed the capacity of the Rapid City FD to provide fire suppression and emergency response services to the community.

VA BHHCS would continue to maintain a police and security unit to provide for the safety of patients, staff, and visitors at the CBOC in Hot Springs and the MSOC and RRTP in Rapid City. VA police would continue to patrol the VA Hot Springs campus until a re-use is implemented that would no longer require VA security. The proposed CBOC would not require 24-hour patrol. Requests could be made of the Hot Springs PD to respond to calls or alarms requiring immediate response and to any potential increase in incidents due to the unoccupied campus, but any increase would not be expected to exceed the response capacity of the Hot Springs PD. VA BHHCS police would monitor any such activity and respond accordingly to protect VA facilities, such as increasing the frequency of patrols by VA police. The presence of VA police would increase in Rapid City to provide protection and security for the MSOC and RRTP, with assistance from the Rapid City PD. Because a location has not been selected, the proximity of the Rapid City PD is not yet determined for responding to calls or alarms from the MSOC or RRTP that could require an immediate response; the need for 24-hour patrols by VA officers would be reviewed but would not likely be necessary. VA BHHCS would update the support agreements with local law enforcement agencies to reflect the change in police presence and security patrols for VA facilities in Hot Springs and Rapid City.

Any decrease in sales tax revenue used to support the Hot Springs VFD and PD because of reduced VA wages would be minor to moderate in sustaining the services when compared to total wages for Fall River County. There would be a negligible change to sales tax revenue used to support the Rapid City FD and PD. Emergency response services are mostly cost recovery services with negligible effects from changes in sales tax revenues.

4.11.2.2.3 Schools

The reduction of approximately 216 FTEEs whose residence is Fall River County would have a minor impact on the capacity of the Fall River County school districts. There were 1,088 students enrolled in the three districts at the end of the 2014 school year (see Table 3.11-1). Students account for approximately 15 percent of the population, or 150 students per 1,000 residents, based on the 2015 projected population of 7,262 for Fall River County (see Table 3.10-1). Using this simple ratio, if all 216 FTEEs relocated out of Fall River County with school-age children, the enrollment would decrease by approximately 32 students or 2.9 percent. This decrease would be minor when compared to the evaluation criteria. Because more than half of the FTEEs (116 of 216) would be eligible for retirement by FY 2020 (see Section 4.10.2.2.1) and would probably not have school-age children at home, the impact on school enrollment would be much less. Assuming the remaining 100 FTEEs would relocate from Fall River County and all would have school-age children, the decrease in school enrollment would be 15 students or 1.3 percent, which would be a minor impact.

Students account for approximately 13 percent of the Pennington County population, or 130 students per 1,000 residents. The addition of 53 FTEEs residing in Pennington County, with an additional (replacement) 28 retirement-eligible FTEEs by 2020, could increase enrollment by approximately 11 students if all FTEEs would have school-age children and would relocate into the school district. This increase would have an unmeasurable impact on a school enrollment of over 13,700 (see Table 3.11-4) and on the Rapid City School District.

Any decrease in sales tax revenue used to support the Fall River County school districts because of reduced VA wages would be minor to moderate in sustaining school revenue when compared to total wages for the county. Any increase in sales tax revenue to support the Rapid City School District would be negligible.

4.11.2.2.4 Parks and Recreation

There are numerous city, state, and federal recreational lands, facilities, and amenities that are easily accessible to VA BHHCS employees in both Hot Springs and Rapid City and the surrounding area. The demand for recreational facilities is also closely linked to the size of the population served, so any reduction in population would increase the amount of city park acreage per resident, having a beneficial effect on the user. Relocating VA BHHCS employees from the VA Hot Springs campus to a new CBOC would impact those employees who use the campus grounds and open spaces during the workday for passive recreation or exercise.

Patients and visitors to the Hot Springs CBOC and Rapid City MSOC would not be expected to use nearby parks because their visits to the VA facilities would be focused on health care services. Patients and visitors to the Rapid City RRTP would likely use parks and recreational facilities that are nearby and accessible from the RRTP. Because Rapid City maintains more parks and open space per 1,000 residents than the national average (see Section 3.11.2.5), any use by VA patients, visitors, and employees would be negligible.

4.11.3 Alternative B

4.11.3.1 Impacts from Construction

Construction of a proposed MSOC in Rapid City could have short-term impacts to public safety and protection services, and would have similar effects on community services as described for Alternative A. Temporary impacts to fire and emergency vehicle response times in Hot Springs could be more extensive than described for Alternative A because the construction site would be larger (11 to 13 acres) to co-locate a CBOC and RRTP with a fire station, and the amount of construction vehicle and equipment traffic would be greater. Construction workers would have similar effects on schools and recreation facilities as described for Alternative A, but the effects would be greater in Hot Springs because of the larger construction workforce.

4.11.3.2 Impacts from Operation

4.11.3.2.1 Hospitals and Clinics

Operational impacts on local clinics and hospitals for Alternative B would be the same as described for Alternative A.

4.11.3.2.2 Fire/Rescue, Emergency Medical, and Law Enforcement Services

The demand for fire and police protection and emergency medical services for Alternative B would not exceed the capacity of local departments, and impacts would be similar to the impacts described for Alternative A. A smaller reduction in FTEEs for Alternative B to operate VA facilities in Hot Springs and Rapid City would have similar impacts to population as Alternative A; thus, the decrease in demand for and operational impacts on fire, police, and emergency services would be slightly less than Alternative A.

VA BHHCS would construct, staff, and operate a new fire station to support a new RRTP in Hot Springs because the Hot Springs VFD would not be able to meet the response times required by VA. The presence of the VA Hot Springs FD would benefit the community by providing firefighting assistance if requested by the Hot Springs VFD in accordance with the mutual aid agreement.

VA BHHCS would continue to maintain a police and security unit to provide for the safety of patients, staff, and visitors at a CBOC and RRTP in Hot Springs. VA police would continue to patrol the VA Hot Springs campus until a re-use is implemented that would no longer require VA security. VA officers would provide 24-hour patrol of the RRTP in Hot Springs. The presence of VA police in Rapid City would be similar to the current situation in which VA police from the Fort Meade campus monitor alarms and other law enforcement actions at the Rapid City facility, with assistance from the Rapid City PD in accordance with the terms of a written support agreement. VA BHHCS would update the support agreements with local law enforcement agencies to reflect the changes in VA facilities in Hot Springs and Rapid City.

The change in sales tax revenue and impact to the Hot Springs VFD and PD or Rapid City FD and PD would be similar to Alternative A but slightly less.

4.11.3.2.3 Schools

The reduction 162 FTEEs residing in Fall River County would have similar impacts on school enrollment and the school districts, but slightly less than described for Alternative A. If all 162 FTEEs relocated out of Fall River County with school-age children, the enrollment would decrease by approximately 24 students or 2.2 percent. This decrease would be minor when compared to the evaluation criteria. Because almost three-fourths of the FTEEs (116 of 162) would be eligible for retirement by FY 2020 and would probably not have school-age children at home, the impact on school enrollment would be much less (decrease of 7 students or 0.6 percent) if the remaining 46 FTEEs would relocate from Fall River County with school-age children.

The reduction of 1 FTEE and 28 retirement-eligible FTEEs residing in Pennington County would have an unmeasurable impact on school enrollment in the Rapid City School District.

Change in sales tax revenue used to support the Fall River County school districts because of reduced VA wages would be minor to moderate in sustaining school revenue when compared to total wages for the county. Change in sales tax revenue to support the Rapid City School District would be negligible.

4.11.3.2.4 Parks and Recreation

Impacts on parks and recreational facilities would be the same as described for Alternative A.

4.11.4 Alternative C

4.11.4.1 Impacts from Construction

Renovations to Building 12 and the domiciliary would have similar effects on community services as described for constructing new facilities for Alternative B because of the comparable number of yearly construction workers needed to complete the renovations. Construction activities on the VA Hot Springs campus could require temporary closures or blockages of internal roads, but access to buildings for VA fire and police vehicles would be maintained during construction.

Construction of a proposed MSOC in Rapid City would have similar impacts to community services as described for Alternative A.

4.11.4.2 Impacts from Operation

4.11.4.2.1 Hospitals and Clinics

Operational impacts on local clinics and hospitals for Alternative C would the same as described for Alternative A.

4.11.4.2.2 Fire/Rescue, Emergency Medical, and Law Enforcement Services

The demand for fire and police protection and emergency medical services and funding sources for these services for Alternative C would be similar to the impacts described for Alternative B. The operation of a renovated CBOC and RRTP on the VA Hot Springs campus and an MSOC in Rapid City would result in the same reduction of FTEEs as Alternative B. There would be no additional demand that would exceed the capacity of the local fire or police protection response or emergency medical services because of changes in VA staff levels to operate VA facilities in either Hot Springs or Rapid City.

VA BHHCS would continue to staff and operate the fire station on the campus to support the RRTP. The continued presence of the VA Hot Springs FD would benefit the community by providing firefighting assistance if requested by the Hot Springs VFD in accordance with the mutual aid agreement.

VA BHHCS would continue to maintain a police and security unit to provide for the safety of patients, staff, and visitors to VA facilities. VA police would continue to patrol the campus, including 24-hour patrol by VA officers for the RRTP. The presence of VA police in Rapid City would be similar to Alternative B. VA BHHCS would update the support agreements with local law enforcement agencies to reflect the change in police presence and security patrols for VA facilities in Hot Springs and Rapid City.

The change in sales tax revenue and impact to the Hot Springs VFD and PD or Rapid City FD and PD would be similar to Alternative A but slightly less.

4.11.4.2.3 Schools

Because the reduction in FTEEs would be the same as Alternative B, impacts on school enrollment and school districts would be the same as Alternative B.

4.11.4.2.4 Parks and Recreation

Because the reduction in FTEEs would be the same as Alternative B, impacts on parks and recreational facilities would be the same as Alternative B, except the VA Hot Springs campus would remain available for passive recreation and exercise by VA employees during the work day.

4.11.5 Alternative D

4.11.5.1 Impacts from Construction

Construction of a proposed MSOC and 76-bed RRTP in Rapid City would impact fire, police, and emergency vehicle response times similar to the impacts described for Alternative A. Temporary impacts to fire, police, and emergency vehicle response times in Hot Springs could be slightly more than described for Alternative A because the construction site would be larger to co-locate a CBOC and 24-bed RRTP with a fire station. Construction workers would have similar effects on schools and recreational facilities as described for Alternative A, because the size of the construction workforce would be comparable.

4.11.5.2 Impacts from Operation

4.11.5.2.1 Hospitals and Clinics

Operational impacts on local clinics and hospitals for Alternative D would the same as described for Alternative A.

4.11.5.2.2 Fire/Rescue, Emergency Medical, and Law Enforcement Services

The demand for fire and police protection and emergency medical services for Alternative D would be similar to the impacts described for Alternative A. A smaller reduction in FTEEs for Alternative D to operate VA facilities in Hot Springs (-201 FTEEs) and a smaller increase in Rapid City (+46 FTEEs) would have similar impacts to population as Alternative A; thus, the change in demand for and operational impacts on community fire, police, and emergency services would be slightly less than Alternative A.

VA BHHCS would construct, staff, and operate a new fire station to support the 24-bed RRTP in Hot Springs because the Hot Springs VFD would not be able to meet the response times required by VA. The presence of the VA Hot Springs FD would benefit the community by providing firefighting assistance if requested by the Hot Springs VFD in accordance with the mutual aid agreement.

VA BHHCS would continue to maintain a police and security unit to provide for the safety of patients, staff, and visitors at a CBOC and 24-bed RRTP in Hot Springs and an MSOC and 76-bed RRTP in Rapid City. VA police would continue to patrol the VA Hot Springs campus until a re-use is implemented that would no longer require VA security. VA police officers would provide 24-hour patrol of the RRTP in Hot Springs. The presence of VA police in Rapid City would be similar to

Alternative A. Because a location has not been selected, the proximity of the Rapid City PD is not yet determined for responding to calls or alarms from the MSOC or RRTP that would require an immediate response; the need for 24-hour patrols by VA officers would be reviewed but would not likely be necessary. VA BHHCS would update the support agreements with local law enforcement agencies to reflect the change in police presence and security patrols for VA facilities in Hot Springs and Rapid City.

The change in sales tax revenue and impact to the Hot Springs VFD and PD or Rapid City FD and PD would be similar to Alternative A but slightly less.

4.11.5.2.3 Schools

Because the reduction of 201 FTEEs would be very similar to Alternative A (216 FTEEs), impacts on Fall River County school enrollment and school districts would be similar to Alternative A. Enrollment would decrease by approximately 30 students or 2.8 percent if all FTEEs relocated out of Fall River County with school-age children, which would be a minor impact. Because more than half of the FTEEs (116 of 201) would be eligible for retirement by FY 2020 and would probably not have school-age children at home, the impact on school enrollment would be much less. Assuming the remaining 85 FTEEs would relocate from Fall River County and all would have school-age children, the decrease in school enrollment would be 13 students or 1.2 percent, which would be a minor impact.

The addition of 46 FTEEs residing in Pennington County, with an additional (replacement) 28 retirement-eligible FTEEs by 2020, could increase enrollment by approximately 10 students if all FTEEs would have school-age children and would all relocate into the school district. This increase would have an unmeasurable impact on school enrollment or on the Rapid City School District.

Change in sales tax revenue used to support the Fall River County school districts because of reduced VA wages would be minor to moderate in sustaining school revenue when compared to total wages for the county. Change in sales tax revenue to support the Rapid City School District would be negligible.

4.11.5.2.4 Parks and Recreation

Because the reduction in FTEEs would be very similar to Alternative A, impacts on parks and recreational facilities would be similar to Alternative A.

4.11.6 Alternative E

4.11.6.1 Impacts from Construction

Constructing new facilities and renovating existing facilities on the VA Hot Springs campus would have similar effects on fire and emergency response times, and law enforcement services as described for Alternative C; however, the extent of the effects would be greater because the construction workforce needed for Alternative E would be more than double that of Alternative C. The temporary influx of construction workers would have similar effects on schools and recreational facilities as described for Alternative A, but the extent of the effects would be greater because the size of the construction workforce would be larger. No construction would be proposed for Rapid City for Alternative E; no construction-related impacts to community services would occur there.

4.11.6.2 Impacts from Operation

4.11.6.2.1 Hospitals and Clinics

There would be no change compared to current levels of Veterans receiving care from non-VA providers.

4.11.6.2.2 Fire/Rescue, Emergency Medical, and Law Enforcement Services

The demand for fire and police protection and emergency medical services is closely linked to the size of the population served. The expansion of the VA Hot Springs campus would increase the FTEEs residing in Fall River County by approximately 206 and in Pennington County by approximately 30 (see Table 4-10.12). If these 206 FTEEs all relocated to Fall River County from outside the county, the projected 2020 population (see Table 3.10-1) would increase by approximately 2.8 percent, which would be a moderate impact. There could be additional demand from this population increase that could exceed the capacity of fire or police protection response or emergency medical services from local departments in Hot Springs. There would be no measurable change to the Pennington County population that would have an additional demand on fire, police, or emergency services.

VA BHHCS would continue to staff and operate the fire station on the campus to support the RRTP and expanded 24-hour inpatient care. The doubling of the number of RRTP beds would not be expected to increase the VA Hot Springs FD staffing or equipment. The continued presence of the VA Hot Springs FD would benefit the community by providing firefighting assistance if requested by the Hot Springs VFD in accordance with the mutual aid agreement.

VA BHHCS would continue to maintain a police and security unit to provide for the safety of patients, staff, and visitors to the expanded VA Hot Springs campus. VA police would continue 24-hour patrols of the campus. VA security in Rapid City would be similar to the current operations, in which VA police from the Fort Meade campus monitor alarms and other law enforcement actions at the CBOC, with assistance from the Rapid City PD in accordance with the terms of a written support agreement. VA BHHCS would maintain the support agreements with local law enforcement agencies for the VA facilities in Hot Springs and Rapid City.

Increases in sales tax revenue from increases in the VA wages would benefit funding for fire and police services, local schools, and parks and recreational facilities in both communities, and would be a major beneficial impact for Fall River County.

4.11.6.2.3 Schools

The increase of approximately 206 FTEEs whose residence would be Fall River County would have a minor impact on the capacity of the Fall River County school districts. There were 1,088 students enrolled in the three districts at the end of the 2014 school year (see Table 3.11-1). Students account for approximately 15 percent of the population, or 150 students per 1,000 residents, based on the 2015 projected population of 7,262 for Fall River County (see Table 3.10-1). Using this simple ratio, if all 206 FTEEs relocated to Fall River County with school-age children, the enrollment would increase by approximately 31 students or approximately 2.8 percent. This increase would be a moderate impact on enrollment when compared to the evaluation criteria. If the 116 retirement-eligible FTEEs from Fall River County would be replaced to implement Alternative E and all had

school-age children, enrollment would increase by approximately 48 students or approximately 4.4 percent, which would be a major impact on enrollment. However, if all 48 students enrolled in the Hot Springs School District, the student-to-staff ratio would be 14.5, which would slightly exceed the state average of 14.1.

Students account for approximately 13 percent of the Pennington County population, or 130 students per 1,000 residents. The increase of 30 FTEEs residing in Pennington County, along with 28 eligible for retirement by 2020, would increase enrollment by approximately 8 students which would have an unmeasurable impact on school enrollment and the Rapid City School District.

4.11.6.2.4 Parks and Recreation

Impacts on parks and recreational facilities would be similar to the impacts described for Alternative A, but with an increase in FTEEs and population, usage of local parks and recreational facilities in Hot Springs would be expected to increase.

4.11.7 Alternative F

4.11.7.1 Impacts from Construction

Buildings on the VA Hot Springs campus would be renovated as agency budgets allow. Renovations would have similar effects on community services in Hot Springs as described for Alternative A. Construction activities on the VA Hot Springs campus could require temporary closures or blockages of internal roads, but access to buildings for VA fire and police vehicles would be maintained during construction. No construction or renovations are proposed for the CBOC in Rapid City under this alternative.

4.11.7.2 Impacts from Operation

Operation of the VA Hot Springs campus and Rapid City CBOC would continue with the FTEEs assigned to these facilities. There would be no additional demand in services that would exceed the capacity of the local fire, police, or emergency medical services, or increased school enrollment or usage of parks and recreational facilities because of continued operation of VA facilities in either Hot Springs or Rapid City.

VA BHHCS would continue to maintain a police and security unit and FD to provide for the safety of patients, staff, and visitors to the VA Hot Springs campus, and support the RRTP and 24-hour inpatient care. VA police would continue 24-hour patrols of the campus. VA BHHCS would maintain support agreements with local law enforcement agencies, and provide firefighting assistance if requested by the Hot Springs VFD in accordance with the mutual aid agreement.

4.11.8 Supplemental Alternative G

4.11.8.1 Impacts from Construction

Supplemental Alternative G would involve full or partial re-use of the VA Hot Springs campus and could only happen with implementation of Alternatives A, B, C, or D. If a potential re-use included renovations or modifications to buildings or construction of additional buildings on the campus, construction activities that could increase the demand on fire, police, and emergency vehicle response times, school enrollment, and parks and recreational facilities would likely be similar to the

impacts described for Alternatives C and E. However, the extent of the impacts on these community services would depend on the number of construction workers that would be users of these services and the time period over which construction would occur.

4.11.8.2 Impacts from Operation

The type of re-use of the VA Hot Springs campus would determine the extent of effects to community services. Additional employment and induced population growth relating to this alternative could lead to increased demand on fire and police protection, and increased school enrollment and usage of parks and recreational facilities. The extent of any impacts would depend on the scope and scale of the re-use and the employment workforce it would need; however, the impacts would likely be similar to those described for Alternatives C and E.

4.12 Solid Waste and Hazardous Materials

4.12.1 Evaluation Criteria

The potential effects related to solid waste generation and disposal were evaluated through a comparison of current and projected solid waste generation rates and the permitted capacity and intake rates for solid waste landfills serving each project area. The evaluation resulted in a determination as to whether existing solid waste disposal facilities could accommodate the projected solid waste generation rates for each alternative.

Hazardous materials that could be transported, used, encountered, or disposed in the construction and operation of each alternative were evaluated to predict the potential effects to human health and the environment. Additionally, the potential for legacy hazardous material contamination at project sites was considered.

An alternative would be considered to result in an adverse impact related to solid waste and hazardous materials if it would:

- result in the exposure of the public or the environment to harmful levels of hazardous materials
- exceed the permitted capacity or intake rates for solid waste landfills serving each project area
- result in noncompliance with applicable federal and state regulations or VA management practices

4.12.2 Alternative A

4.12.2.1 Impacts from Construction

Wastes generated by construction activities would be transferred to either the Custer Fall River Regional Landfill or the Rapid City Landfill, both of which have adequate capacity to receive additional solid waste.

Locations for the proposed new facilities have not yet been selected. As such, the potential for existing contamination at a project site cannot be determined. However, should environmental contamination be encountered during construction activities, all waste would be abated and managed in accordance with regulations and disposed in appropriate disposal facilities.

In the event that a new storage tank is installed as part of facility construction, the tank must be registered with SDDENR and spill controls may need to be installed. Similarly, any tanks that are closed and removed as part of demolition activities must be coordinated with SDDENR and in accordance with applicable regulations.

Construction-related adverse impacts from solid and hazardous materials are not expected to occur. Short-term increases in solid waste generation are predicted, but would have a negligible effect on remaining landfill capacities. Waste minimization opportunities are described in Chapter 5.

4.12.2.2 Impacts from Operation

Solid waste, medical waste, and hazardous waste generation from the proposed Hot Springs CBOC would decrease from the current waste generation rates of the VAMC campus. Attempts to meet VA waste diversion goals could reduce quantities destined for disposal. Adverse impacts to waste disposal facilities are not expected.

Solid waste, medical waste, and hazardous waste generation from operating an MSOC and RRTP in Rapid City would increase from current waste generation rates. The Rapid City Landfill has sufficient capacity to accept an increase in solid waste generation without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are available to accept increases in medical waste generation. Hazardous waste generation could also increase. VA would determine whether hazardous waste generation from operating a Rapid City MSOC and RRTP could continue to be managed under the Fort Meade VAMC permit or would require a new permit.

Operation of the new facilities is not expected to result in adverse impacts related to solid waste and hazardous materials. In Rapid City, increases in generation of solid, medical, and hazardous waste are predicted, but would have a negligible impact on treatment and disposal facilities. Waste minimization opportunities are described in Chapter 5.

4.12.3 Alternative B

4.12.3.1 Impacts from Construction

Wastes generated by construction activities would be transferred to either the Custer Fall River Regional Landfill or the Rapid City Landfill, both of which have adequate capacity to receive additional solid waste.

Locations for the new facilities have not yet been selected. As such, the potential for existing contamination at a project site cannot be determined. However, should environmental contamination be encountered during construction activities, all waste would be abated and managed in accordance with regulations and disposed in appropriate disposal facilities.

In the event that a new storage tank is installed as part of facility construction, the tank must be registered with SDDENR and spill controls may need to be installed. Similarly, any tanks that are closed and removed as part of demolition activities must be coordinated with SDDENR and in accordance with applicable regulations.

Construction-related adverse impacts from solid waste and hazardous materials are not expected to occur. Short-term increases in solid waste generation are predicted, but would have a negligible impact on remaining landfill capacities. Waste minimization opportunities are described in Chapter 5.

4.12.3.2 Impacts from Operation

Solid waste, medical waste, and hazardous waste generation from a Hot Springs CBOC and RRTP would be similar to or less than current waste generation rates of the VA Hot Springs campus. The Custer Fall River Regional Landfill has sufficient capacity to accept an increase in solid waste

generation without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are available to accept a similar level of medical waste generation. Hazardous waste generation could also increase. VA would determine whether hazardous waste generation could continue to be managed under the current permit or a new permit would be required. Attempts to meet VA waste diversion goals could reduce quantities destined for disposal. Adverse impacts to waste disposal facilities are not expected.

Solid waste, medical waste, and hazardous waste generation from operating an MSOC in Rapid City would increase from current waste generation rates. The Rapid City Landfill has sufficient capacity to accept an increase in solid waste generation without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are available to accept increases in medical waste generation. Hazardous waste generation could also increase. VA would determine whether hazardous waste generation from operating a Rapid City MSOC could continue to be managed under the Fort Meade VAMC permit or would require a new permit.

Operation of the new facilities is not expected to result in adverse impacts to solid and hazardous materials. In Rapid City, increases in generation of solid, medical, and hazardous waste are predicted, but would have a negligible impact on treatment and disposal facilities. Waste minimization opportunities are described in Chapter 5.

4.12.4 Alternative C

4.12.4.1 Impacts from Construction

Wastes generated by renovation of the Hot Springs VAMC and construction of the MSOC in Rapid City would be transferred to either the Custer Fall River Regional Landfill or the Rapid City Landfill, both of which have adequate capacity to receive additional solid waste.

Renovation activities could generate special wastes, including asbestos-containing materials and lead-based paint waste. All waste would be abated and managed in accordance with regulations and disposed in appropriate disposal facilities. Attempts to meet VA solid waste diversion goals would reduce quantities destined for disposal.

A location for a new MSOC in Rapid City has not yet been selected. As such, the potential for existing contamination at a project site cannot be determined. However, should environmental contamination be encountered during construction activities, all waste would be abated and managed in accordance with regulations and disposed in appropriate disposal facilities.

In the event that a new storage tank is installed as part of MSOC construction, the tank must be registered with SDDENR and spill controls may need to be installed. Similarly, any tanks that are closed and removed as part of renovation activities must be coordinated with SDDENR and in accordance with applicable regulations.

Construction- or renovation-related adverse impacts from solid wastes and hazardous materials are not expected to occur. Short-term increases in solid waste generation are predicted, but would have a negligible impact on remaining landfill capacities. Waste minimization opportunities are described in Chapter 5.

4.12.4.2 Impacts from Operation

Solid waste, medical waste, and hazardous waste generation from operations in Hot Springs would be similar to or less than current waste generation rates. The Custer Fall River Regional Landfill has sufficient capacity to continue accepting this level of solid waste without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are available to accept a similar level of medical waste generation. Hazardous waste generation would also be similar or less. VA would determine whether hazardous waste generation could continue to be managed under the current permit or a new permit would be required. Attempts to meet VA waste diversion goals could reduce quantities destined for disposal. Adverse impacts to waste disposal facilities are not expected.

Solid waste, medical waste, and hazardous waste generation from operating an MSOC in Rapid City would increase from current waste generation rates. The Rapid City Landfill has sufficient capacity to accept an increase in solid waste generation without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are available to accept increases in medical waste generation. Hazardous waste generation could also increase. VA would determine whether hazardous waste generation from a Rapid City MSOC could continue to be managed under the Fort Meade VAMC permit or would require a new permit.

Operation of the new/renovated facilities is not expected to result in adverse impacts to solid and hazardous materials. In Rapid City, increases in generation of solid, medical, and hazardous waste are predicted, but would have a negligible impact on treatment and disposal facilities. Waste minimization opportunities are described in Chapter 5.

4.12.5 Alternative D

4.12.5.1 Impacts from Construction

Wastes generated by construction activities would be transferred to either the Custer Fall River Regional Landfill or the Rapid City Landfill, both of which have adequate capacity to receive additional solid waste.

Locations for the new facilities have not yet been selected. As such, the potential for existing contamination at a project site cannot be determined. However, should environmental contamination be encountered during construction activities, all waste would be abated and managed in accordance with regulations and disposed in appropriate disposal facilities.

In the event that a new storage tank is installed as part of facility construction, the tank must be registered with SDDENR and spill controls may need to be installed. Similarly, any tanks that are closed and removed as part of demolition activities must be coordinated with SDDENR and in accordance with applicable regulations.

Construction-related adverse impacts from solid wastes and hazardous materials are not expected to occur. Short-term increases in solid waste generation are predicted, but would have a negligible impact on remaining landfill capacities. Waste minimization opportunities are described in Chapter 5.

4.12.5.2 Impacts from Operation

Solid waste, medical waste, and hazardous waste generation from operating a CBOC and 24-bed RRTP in Hot Springs would decrease from current waste generation rates. The Custer Fall River Regional Landfill has sufficient capacity to accept a decreased level of solid waste generation without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are available to accept a decreased level of medical waste generation. Hazardous waste generation could also decrease. VA would determine whether hazardous waste generation could continue to be managed under the current permit or a new permit would be required. Attempts to meet VA waste diversion goals could reduce quantities destined for disposal. Adverse impacts to waste disposal facilities are not expected.

Solid waste, medical waste, and hazardous waste generation from operating an MSOC and 76-bed RRTP in Rapid City would increase from current waste generation rates. The Rapid City Landfill has sufficient capacity to accept an increase in solid waste generation without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are available to accept increases in medical waste generation. Hazardous waste generation could also increase. VA would determine whether hazardous waste generation from Rapid City operations could continue to be managed under the Fort Meade VAMC permit or would require a new permit.

Operation of the new facilities is not expected to result in adverse impacts to solid wastes and hazardous materials. In Rapid City, creases in generation of solid, medical, and hazardous waste are predicted, but would have a negligible impact on treatment and disposal facilities. Waste minimization opportunities are described in Chapter 5.

4.12.6 Alternative E

4.12.6.1 Impacts from Construction

Wastes generated by renovation and small-scale construction activities at the Hot Springs campus would be transferred to the Custer Fall River Regional Landfill, which has adequate capacity to receive additional solid waste. No construction activities would occur in Rapid City.

Renovation activities could generate special wastes, including asbestos-containing materials and lead-based paint waste. All waste would be abated and managed in accordance with regulations and disposed in appropriate disposal facilities. Attempts to meet VA solid waste diversion goals would reduce quantities destined for disposal.

Renovation- and construction-related adverse impacts from solid and hazardous materials are not expected to occur. Short-term increases in solid waste generation are predicted, but would have a negligible impact on remaining landfill capacities. Waste minimization opportunities are described in Chapter 5.

4.12.6.2 Impacts from Operation

Solid waste, medical waste, and hazardous waste generation from expanded operations on the Hot Springs campus would increase from current waste generation rates. The Custer Fall River Regional Landfill has sufficient capacity to accept an increase in solid waste generation without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are

available to accept increases in medical waste generation. Hazardous waste generation could also increase. VA would determine whether hazardous waste generation could continue to be managed under the current permit or a new permit would be required. Attempts to meet VA waste diversion goals could reduce quantities destined for disposal. Adverse impacts to waste disposal facilities are not expected.

Solid waste, medical waste, and hazardous waste generation from operations in Rapid City would remain relatively similar to current waste generation rates.

Operation of the facilities is not expected to result in adverse impacts to solid and hazardous materials. In Hot Springs, increases in generation of solid, medical, and hazardous waste are predicted, but would have a negligible impact on treatment and disposal facilities. Waste minimization opportunities are described in Chapter 5.

4.12.7 Alternative F

4.12.7.1 Impacts from Construction

Under Alternative F, only renovation of existing facilities at the Hot Springs VAMC as authorized by annual budgets would occur. Wastes generated by renovation activities would be transferred to the Custer Fall River Regional Landfill, which has adequate capacity to receive additional solid waste. No construction activities would occur in Rapid City.

Renovation activities could generate special wastes, including asbestos-containing materials and lead-based paint waste. All waste would be abated and managed in accordance with regulations and disposed in appropriate disposal facilities. Attempts to meet VA solid waste diversion goals would reduce quantities destined for disposal.

Renovation-related adverse impacts from solid and hazardous materials are not expected to occur. Short-term increases in solid waste generation are predicted, but would have a negligible impact on remaining landfill capacities. Waste minimization opportunities are described in Chapter 5.

4.12.7.2 Impacts from Operation

Solid waste, medical waste, and hazardous waste generation from operations in Hot Springs and Rapid City would remain relatively similar to current waste generation rates. Continued operation of the facilities is not expected to result in adverse impacts to solid and hazardous materials. Waste minimization opportunities are described in Chapter 5.

4.12.8 Supplemental Alternative G

4.12.8.1 Impacts from Construction

Under Supplemental Alternative G, some or all of the existing facilities in Hot Springs would be re-used by other tenants. Depending on the intended use, some facility renovation or small-scale construction may be required. Wastes generated by renovation and construction activities would be transferred to the Custer Fall River Regional Landfill, which has adequate capacity to receive additional solid waste.

Renovation activities could generate special wastes, including asbestos-containing materials and lead-based paint waste. All waste would be abated and managed in accordance with regulations and disposed in appropriate disposal facilities. Attempts to meet VA solid waste diversion goals would reduce quantities destined for disposal.

Construction- and renovation-related adverse impacts from solid and hazardous materials are not expected to occur. Short-term increases in solid waste generation are predicted, but would have a negligible impact on remaining landfill capacities. Waste minimization opportunities are described in Chapter 5.

4.12.8.2 Impacts from Operation

Operation of some or all of the Hot Springs VAMC facilities by new tenant(s) is not expected to result in adverse impacts to solid and hazardous materials. Solid waste, medical waste, and hazardous waste generation could increase or decrease, depending on nature of the tenant operations. The Custer Fall River Regional Landfill has sufficient capacity to accept an increase in solid waste generation without adversely affecting the facility. Similarly, medical waste treatment facilities (located outside South Dakota) are available to accept increases in medical waste generation. Hazardous waste generation could also increase. The tenant would determine whether a hazardous waste permit would be required.

4.13 Transportation and Traffic

4.13.1 Evaluation Criteria

The evaluation of transportation and traffic focuses on the operational capacity and physical condition of the urban and rural roadway networks and the availability of modes of travel. The VA Site Development Design Manual (VA 2013) includes traffic circulation and roadway network as criteria for site selection, along with accessibility to public transportation. An impact would be considered adverse if a reconfiguration alternative would result in any of the following conditions:

- The current roadway network is insufficient to accommodate changes in traffic circulation around existing or proposed VA BHHCS facilities in Hot Springs or Rapid City without major capacity, safety, or access improvements.
- A substantial increase in demand for public transit services that could not be accommodated by transit providers without disrupting available capacity or existing levels of service.
- Potentially hazardous conditions for pedestrians or bicyclists, or interference with pedestrian or bicycle access to existing or proposed VA BHHCS facilities or adjacent areas.

Reduction in vehicle trips or travel associated with any reconfiguration alternative would be a beneficial impact on traffic circulation on the local and urban roadway networks.

4.13.2 Alternative A

4.13.2.1 Impacts from Construction

Construction of the proposed CBOC in the Hot Springs area and the proposed MSOC and RRTP in the Rapid City area would temporarily disrupt the roadway network and traffic circulation. The extent of the disruption would depend on the location of the selected sites and the existing roadway function (arterial, collector, or local road), and traffic conditions. Construction activities could temporarily require the closure or restriction of travel lanes (including sidewalks and bikeways) or designation of a detour, which could result in traffic congestion near the construction sites and impede safe travel by pedestrians and bicyclists. Trucks hauling construction equipment, materials, and debris to and from the sites would be expected to use local truck traffic routes; however, haul truck activity would still likely result in temporary adverse impacts on traffic in the vicinity of the construction sites. Traffic control plans would be coordinated with the local public works/engineering departments to address temporary road closures, detours, and haul truck routes to minimize disruption to traffic flow and to maintain access to any businesses and residential areas that could be near the selected locations.

Increases in the number of construction worker vehicles and haul trucks traveling on the primary arterials outside the city limits of Hot Springs and Rapid City would be temporary and not likely to have any adverse effects to these roadways.

4.13.2.2 Impacts from Operation

4.13.2.2.1 Hot Springs

The roadway network through and around Hot Springs would be expected to accommodate traffic to and from a new five-acre CBOC site located in the Hot Springs area. Depending on the selected site, local roadway improvements could include resurfacing, drainage (curb and gutter), accessible sidewalks, and crosswalks.

Vehicle trips to, from, and within Hot Springs by employees, patients, visitors, and support/delivery services would decrease with the relocation of the RRTP to Rapid City, maintenance status of the VA Hot Springs campus pending re-use, and availability of expanded health care services at an MSOC in Rapid City. The reduction in vehicle trips would result in a net neutral or a beneficial impact on local traffic and roads. On a city-wide basis, the route of these vehicle trips would change based on the location of the new Hot Springs CBOC in relation to the VA campus, but could still affect traffic circulation and congestion during the peak tourist season along the main thoroughfares and intersections.

Rural public transit could experience an increase in demand for transportation service should Veterans choose not to use their community's health care services and instead choose to travel to a VA facility. Since rural public transit is provided on 24-hour advanced request, any increase in demand is not likely to disrupt capacity or level of service.

4.13.2.2.2 Rapid City

The roadway network through and around Rapid City would be expected to accommodate traffic to and from a 17-acre site for a co-located RRTP and MSOC. Depending on the selected site, local roadway improvements could include resurfacing, drainage (curb and gutter), turn lanes, traffic signals, bus turn-outs, bicycle lanes, accessible sidewalks, and crosswalks. These improvements are typical of new developments within larger communities and would be addressed by the local zoning and code requirements for public roadways and traffic control to minimize adverse effects.

Operating an MSOC and RRTP in the Rapid City area would increase vehicle trips to and from the selected site. Any adverse effect to local traffic conditions would depend on the location of the site and roadway improvements associated with the development. Traffic congestion is based on the number of vehicle trips during peak travel hours. The number of peak-hour vehicle trips made by employees, patients, visitors, and delivery services can be estimated based on the type of land use or facility. The estimated vehicle trips associated with an MSOC and RRTP are shown in Table 4.13-1.

Table 4.13-1. Estimated Vehicle Trips for MSOC and RRTP.

Facility Type	Trip Rate Unit[1]	Trip Rate[1]		Units[2]	Vehicle Trips	
		PM Peak Hour	Daily		PM Peak Hour	Daily
MSOC[3]	**1,000 square feet**	**3.57**	**36.13**	**66,281 square feet**	**237**	**2,395**
RRTP[4]	**Room**	**0.47**	**5.63**	**100 beds**	**47**	**563**
Total (co-located MSOC and RRTP)					**284**	**2,958**

[1] Source: ITE 2012.
[2] Refer to Section 2.3.1.1.1, New Facilities
[3] Comparable to medical office land use code (ITE 2012).
[4] Comparable to motel land use code (ITE 2012).

An estimated 284 vehicles could be entering and exiting the site of a co-located MSOC and RRTP during a peak hour between 4:00 p.m. and 6:00 p.m. on a weekday. This number of vehicles could contribute to current or future congestion (based on 2035 projected traffic) anticipated along principal and minor arterial roadways throughout Rapid City during evening peak travel time (shown in Figures 3.13-2, 3.13-3, and 3.13-5 in Section 3.13). The extent of any adverse effect to traffic circulation would depend on the selected site and travel routes to and from the site, and locations of other future development that would contribute to 2035 traffic. The estimated 2,958 daily vehicle trips on weekdays would contribute to the average daily traffic on the roadways used as travel routes to access the site of a co-located MSOC and RRTP. The current (2014) average daily traffic on principal and minor arterial roadways ranges between 8,000 and 30,000 vehicles (see Section 3.13.2.2) and, depending on the location and travel routes, the daily vehicle trips to and from a co-located MSOC and RRTP could have an adverse effect on traffic circulation on lesser-traveled roadways. However, if travel routes are the same as those used to access the existing CBOC, the number of daily vehicle trips would be less due to accounting for the CBOC vehicles trips already on those routes. Any effect on roadway condition or capacity that could require improvements would depend on whether current or projected traffic exceeds the design function of the roadway for safe and convenient travel. VA BHHCS would coordinate with the Rapid City Public Works Department to complete a traffic study, if required, for the selected site for the MSOC and RRTP and incorporate appropriate roadway improvements into the site design. Roadway improvements to minimize adverse traffic impacts could include traffic signals, turn lanes, and bus turn-outs.

The demand for public transportation (fixed bus route and door-to-door transit) could increase because of the addition of the MSOC and RRTP to the Rapid City area. A criterion for site selection is accessibility to public transportation; therefore, a fixed bus route adjacent to or near the selected site(s) could experience an increase in riders. The extent of any adverse effect from increased ridership would depend on the existing operating capacity on routes serving the area. VA BHHCS would coordinate with the Rapid Transit System to encourage adding or extending bus service and capacity to accommodate any increased ridership, including adding a bus stop and shelter at the site of the MSOC and RRTP. Since door-to-door transit is provided on 24-hour advanced request, any increase in demand is not likely to disrupt capacity or level of service.

4.13.3 Alternative B

4.13.3.1 Impacts from Construction

Construction activities would be expected to have similar effects on local roadways and traffic circulation as described for Alternative A. Temporary impacts to traffic in the Hot Springs area could be more extensive than described for Alternative A because the construction site would be larger (11 to 13 acres) to co-locate a CBOC and RRTP with a fire station. Because only an MSOC (10-acre site) is proposed for Rapid City, construction-related impacts on traffic could be less extensive than Alternative A. The extent of impacts would be dependent on the location of the selected sites in Hot Springs and Rapid City and the design function and traffic conditions of the roadway network adjacent to and surrounding the sites.

4.13.3.2 Impacts from Operation

4.13.3.2.1 Hot Springs

Impacts to local roadways and traffic circulation would be similar to impacts described for Alternative A. This is because the number of vehicle trips would still likely decrease due to the reduction in FTEEs and availability of expanded health care services at a new MSOC in Rapid City. Impacts to rural public transit would be similar to the impacts described for Alternative A.

4.13.3.2.2 Rapid City

Impacts to the local roadways and traffic circulation in Rapid City would be similar to and possibly less extensive than the impacts described for Alternative A. Operation of an MSOC in Rapid City would increase daily vehicle trips (see Table 4.13-1) to and from the selected site over the number of vehicle trips to the existing CBOC, and would have similar but less extensive impacts to traffic circulation and congestion as the impacts described for Alternative A. Impacts to public transportation would be similar to but less extensive than the impacts described for Alternative A.

4.13.4 Alternative C

4.13.4.1 Impacts from Construction

Construction activities in Hot Springs would only occur on the VA campus and would be primarily internal building renovations. Temporary construction impacts to local roadways and traffic circulation would be limited to disruptions caused by haul truck activity, and would be similar to but less extensive than the impacts described for Alternative A.

Potential impacts to Rapid City roadways and traffic during construction of an MSOC would be similar to the impacts described for Alternative A. Because only a 10-acre site is proposed instead of a larger site to co-locate an RRTP, the extent of any construction-related disruptions to roadways and traffic would be less extensive than Alternative A, but would depend on the design function and traffic conditions of the roadway network adjacent to and surrounding the site.

4.13.4.2 Impacts from Operation

4.13.4.2.1 Hot Springs

Impacts to local roadways and traffic would be similar to impacts described for Alternative A. This is because the number of vehicle trips would still likely decrease due to the reduction in FTEEs and availability of expanded health care services at a new MSOC in Rapid City. Impacts to rural public transit would be similar to the impacts described for Alternative A.

4.13.4.2.2 Rapid City

Impacts to the local roadways and traffic circulation in Rapid City would be similar to the impacts described for Alternative B. Impacts to public transportation would be similar to but less extensive than the impacts described for Alternative A.

4.13.5 Alternative D

4.13.5.1 Impacts from Construction

Construction activities would be expected to have similar effects on local roadways and traffic circulation as described for Alternative A. Temporary impacts to traffic in the Hot Springs area could be more extensive than described for Alternative A because the construction site would be larger (11 to 13 acres) to co-locate a CBOC and 24-bed RRTP with a fire station. Although the RRTP proposed for Rapid City would have fewer beds than Alternative A, the size of the site (14 to 17 acres) to co-locate the RRTP and MSOC would be similar; thus, construction-related impacts on traffic would be similar to those described for Alternative A. The extent of impacts would be dependent on the location of the selected sites in Hot Springs and Rapid City and the design function and traffic conditions of the roadway network adjacent to and surrounding the sites.

4.13.5.2 Impacts from Operation

4.13.5.2.1 Hot Springs

Impacts to local roadways and traffic circulation would be similar to impacts described for Alternative A. This is because the number of vehicle trips would still likely decrease due to the reduction in FTEEs and availability of expanded health care services at a new MSOC in Rapid City. Impacts to rural public transit would be similar to the impacts described for Alternative A.

4.13.5.2.2 Rapid City

Impacts to the local roadways and traffic circulation in Rapid City would be similar to and possibly less extensive than the impacts described for Alternative A. Operation of an MSOC and a 76-bed RRTP would increase daily vehicle trips (but less than shown in Table 4.13-1) to and from the selected site over the number of vehicle trips to the existing CBOC, and would have similar but less extensive impacts to traffic circulation and congestion as the impacts described for Alternative A because the RRTP would have fewer beds than Alternative A. Impacts to public transportation would be similar to but less extensive than the impacts described for Alternative A.

4.13.6 Alternative E

4.13.6.1 Impacts from Construction

Construction activities in Hot Springs would likely only occur on the VA campus and would include exterior and interior renovations to numerous buildings, the addition of another floor to Building 12, and construction of new buildings to accommodate additional RRTP beds and housing. Temporary construction impacts to local roadways and traffic circulation would be limited to disruptions caused by haul truck activity, and would be similar to and more extensive than the impacts described for Alternative B.

Because no modifications to the existing CBOC in Rapid City are proposed and an MSOC would not be constructed, there would be no temporary disruptions to local roads or traffic from construction activities in Rapid City.

4.13.6.2 Impacts from Operation

4.13.6.2.1 Hot Springs

Operations of the VA Hot Springs campus would expand with doubling the RRTP capacity; increasing the number of in-patient, community living center, and intensive care beds; and initiating compensated work therapy programs. The number of VA FTEEs would almost double, along with workers from other support systems.

The proposed expansion would greatly increase vehicle trips by employees, patients, visitors, and support/delivery services and workers, which could have an adverse effect on the traffic circulation on the local roadways through Hot Springs and on the campus. Traffic congestion and vehicle queues could increase along the main thoroughfares and at certain intersections during peak morning and evening travel hours, and during the peak tourist season. The capacity of the roadway network in Hot Springs would likely accommodate an increase in vehicle trips; however, certain roadway improvements such as adding turn lanes and intersection signals (traffic light, four-way stop) would minimize adverse traffic impacts. Implementation of any roadway improvements outside the VA campus would be at the discretion of the City of Hot Springs.

The additional vehicle trips could adversely affect the capacity of the roadway network and parking on the campus such that roadway improvements could be necessary to minimize traffic congestion, especially during peak travel hours. Possible improvements could include one-way travel direction, lane striping, and additional parking.

Demand for rural public transit service is not likely to change.

4.13.6.2.2 Rapid City

There would be no change to the operation of the Rapid City CBOC that would have any effect on local roadways, traffic, or public transportation.

4.13.7 Alternative F

4.13.7.1 Impacts from Construction

Buildings on the VA Hot Springs campus would be renovated and modified to maintain clinical standards as funds are available through the routine budget process. Construction-related transportation impacts would be similar to the impacts described for Alternative C but would be less extensive. There would be no upgrades or renovations to the existing CBOC in Rapid City so there would be no temporary impacts on local roads or traffic from construction in Rapid City.

4.13.7.2 Impacts from Operation

There would be no change to the operation of the Hot Springs campus that would affect local roads or traffic. Vehicle trips to and from the campus would be expected to remain fairly consistent. Demand for rural public transit service is not likely to change. There would be no change to the operation of the Rapid City CBOC that would have any effect on local roadways, traffic, or public transportation.

4.13.8 Supplemental Alternative G

4.13.8.1 Impacts from Construction

Supplemental Alternative G involves full or partial re-use of the VA Hot Springs campus and could only happen with implementation of Alternatives A, B, C, or D. If a potential re-use included renovations or modifications to buildings or construction of additional buildings on the campus, construction-related impacts to the roadway network and local traffic would be similar to the impacts described for Alternatives C and E. There would be no construction-related transportation impacts if a potential re-use did not require any construction, renovation, or modification to campus buildings.

4.13.8.2 Impacts from Operation

The type of re-use of the VA Hot Springs campus would determine the extent of effects to the roadway network and traffic in Hot Springs and on the campus. The extent of any adverse impacts would depend on the specific re-use and the level of traffic it would generate, which could vary widely, for example, from low-traffic uses of a continuing care facility or low-density residential occupation of existing buildings, in contrast to retail or general office uses. Impacts to the roadway network and traffic circulation could be similar to impacts described for Alternative E. However, some re-use proposals, such as the Medical Miracle (see Section 2.3.8), would incorporate off-campus components of their activities, which would further increase vehicle trips through Hot Springs and potentially have a greater adverse effect by increasing traffic congestion and vehicle queues during peak travel times. Roadway improvements could be necessary to minimize traffic congestion, especially during peak travel hours. Possible improvements could include adding turn lanes and intersection signals (traffic light, four-way stop) on the main thoroughfares in Hot Springs and one-way travel direction, lane striping, and additional parking on the VA campus.

4.14 Utilities

4.14.1 Evaluation Criteria

An alternative would be considered to result in an adverse impact related to utilities if it would:

- require or result in the construction of new water supply or new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause adverse environmental effects
- require or result in the construction of new electricity or natural gas generation or transmission facilities, the construction of which could cause adverse environmental effects
- require or result in the construction of communications lines or expansion of existing facilities, the construction of which could cause adverse environmental effects

The assumptions used in estimating utility consumption and potential for impacts are listed in the following paragraphs.

4.14.1.1 Water Supply and Wastewater Treatment

Indoor water use projections can vary widely for a given facility and function, and would depend on the number of staff employed and patients served. However, water use projections for some facilities based on facility size are available.

- CBOC – It is assumed that a CBOC would resemble the water use of a facility characterized as a medical office. Reported medical office water use rates range from 0.0375 gallons per day per square foot (gpd/ft^2) to 0.6185 gpd/ft^2. A water use rate of 0.1308 gpd/ft^2 was used in the impact evaluation (Morales et al. 2009).
- MSOC – It is assumed that an MSOC would, as an upper bound, resemble the water use of a facility characterized as a hospital. A water use rate of 0.2040 gpd/ft^2 was used in the impact evaluation (Stanford 2010).
- RRTP – It is assumed that a RRTP would resemble the water use of a facility characterized as a hotel. A water use rate of 0.2696 gpd/ft^2 was used in the impact evaluation (Morales et al. 2009).

Outdoor water uses (including landscape irrigation) are also included in water use projections. It is assumed that approximately 10 percent of a site would be irrigated, and the associated outdoor water use requirement is approximately 610,000 gallons per year per acre (Brelje & Race 2009). This estimate is consistent with past Hot Springs VAMC irrigation water usage (average 620,000 gallons per year per acre from FY 2010 to FY 2014) (L. Epperson, email to C. Modovsky and M. Peters, July 6, 2015).

Wastewater generation rates are typically associated with water consumption rates. An indoor water use to wastewater generation ratio of 1:1 was assumed for the impact evaluation.

4.14.1.2 Electricity

The potential effects related to electricity consumption were evaluated through a comparison of current and projected electricity consumption rates and the ability of electric utilities to supply the projected consumption requirements. Electricity consumption rates were projected using the current electricity consumption rates, standard electricity consumption rates based on geographic location and facility size, and the estimated facility size for each alternative. The standard annual electricity consumption rate of 13.2 kilowatt-hours per square foot for all buildings in the Midwest census region (EIA 2003a) was used for the impact evaluation.

4.14.1.3 Heating

For new facilities located in Rapid City, where natural gas is available, the standard annual natural gas consumption rate of 51.5 cubic feet per gross square foot (ft^3/GSF) for all buildings in the Midwest census region (EIA 2003b) was used for the impact evaluation.

For new facilities located in Hot Springs, propane-fueled heating was assumed. The heating requirement was determined using the standard natural gas consumption rate, and a corresponding propane consumption rate was calculated.

For use of existing (and renovated) facilities at the VAMC in Hot Springs, continued consumption of fuel oil was assumed. The fuel oil consumption rate for the existing VA Hot Springs facilities indicates that the campus has a higher rate of energy use for facility heating, measured in British thermal units (Btu) per GSF, than the standard consumption rate (EIA 2003b). This may be due to inefficiencies with the boiler system and because generated steam is used for purposes other than heating (such as equipment sterilization, hot water production, and humidification). Renovations to the boiler system could result in improved efficiencies.

4.14.1.4 Communications

The potential effects related to communications services were evaluated through a qualitative assessment of the ability of communications utilities to provide services to new facilities.

4.14.2 Alternative A

The following assumptions pertain to facilities under Alternative A:

- CBOC, Hot Springs – approximately 16,711 GSF, minimal landscape irrigation requirements
- MSOC, Rapid City – approximately 66,281 GSF, minimal landscape irrigation requirements
- RRTP (100-bed facility), Rapid City – approximately 78,675 GSF, moderate landscape irrigation requirements

4.14.2.1 Impacts from Construction

Projected utility requirements for all alternatives are summarized in Figure 4.14-1.

Figure 4.14-1. Projected Utility Requirements

BHHCS EIS Utilities

Constants:

Facility Size Estimates

Facility	GSF	Irr. Acres
Hot Springs VAMC	464,000	15.0
CBOC	16,711	0.5
RRTP (100 bed)	78,675	1.0
RRTP (24 bed)	28,119	0.6
MSOC	66,281	1.0
RRTP (76 bed)	66,661	0.7
Fire Department	7,099	0.0

Utility Consumption Estimates

Commodity	Rate	Unit	Source	Rate	Unit
Electricity	13.2	kWh/GSF yr	EIA 2013a		
Natural Gas	51.5	ft^3/GSF yr	EIA 2013b		
Natural Gas	1,030	BTU/ft^3	Propane 101		
Propane	2,516	BTU/ft^3	Propane 101		
Propane	0.0278	gal/ft^3	@ STP		
Water, Clinic Avg.	0.10	gal/GSF day	Stanford Univ.	0.1000	gal/GSF day
Water, Hospital	1,310	L/bed day	Mays et. al.	346	gal/bed day
Water, Hospital	177	gal/bed day	Sutter Med. Ctr.	177	gal/bed day
Water, Hospital	315	gal/bed day	WaterSense	315	gal/bed day
Water, Hospital Avg. (MSOC)	0.204	gal/GSF day	Stanford Univ.	0.2040	gal/GSF day
Water, Hotel	102	gal/room day	WaterSense	102	gal/room day
Water, Hotel/Motel (RRTP)	8.2	gal/HSF mo	Morales et. al.	0.2696	gal/HSF day
Water, Medical Office	25.2	L/m^2 day	Mays et. al.	0.6185	gal/GSF day
Water, Medical Office (CBOC)	3.98	gal/HSF mo	Morales et. al.	0.1308	gal/HSF day
Water, Medical Office	0.0375	gal/GSF day	Sutter Med. Ctr.	0.0375	gal/GSF day
Water, Nursing Home	503	L/bed day	Mays et. al.	133	gal/bed day
Water, Office	12	gal/worker day	WaterSense	12	gal/worker day
Water, Private Hospital	2.62	gal/HSF mo	Morales et. al.	0.0861	gal/HSF day
Water/Wastewater Ratio	1.0	gal : gal	assumed		
Water, Landscape Irrigation	610,000	gal/acre yr	Sutter Med. Ctr. (CA)		

Electricity and Heating:

Alt.	RC GSF	HS GSF	RC Elec. kWh/yr	HS Elec. kWh/yr	Tot. Elec. kWh/yr	RC NG ft3/yr	RC NG MMBTU/yr	HS Prop. gal/yr	HS Prop. MMBTU/yr
A	144,956	16,711	1,913,419	220,585	2,134,004	7,465,234	7,689	9,794	886
B	66,281	95,386	874,909	1,259,095	2,134,004	3,413,472	3,516	55,907	5,060
C	66,281	181,426	874,909	2,394,823	3,269,732	3,413,472	3,516	Fuel Oil	Fuel Oil
D	132,942	44,830	1,754,834	591,756	2,346,590	6,846,513	7,052	26,275	2,378
E	16,711	600,000	220,585	7,920,000	8,140,585	860,617	886	Fuel Oil	Fuel Oil
F	16,711	464,000	220,585	6,124,800	6,345,385	860,617	886	Fuel Oil	Fuel Oil

Water and Wastewater:

Alt.	RC GSF	HS GSF	RC H_2O Indoor gal/yr	RC H_2O Outdoor gal/yr	RC H_2O Total gal/yr	RC WW gal/yr	HS H_2O Indoor gal/yr	HS H_2O Outdoor gal/yr	HS H_2O Total gal/yr	HS WW gal/yr
A	144,956	16,711	12,676,903	1,220,000	13,896,903	12,676,903	798,117	305,000	1,103,117	798,117
B	66,281	95,386	4,935,283	610,000	5,545,283	4,935,283	8,539,737	915,000	9,454,737	8,539,737
C	66,281	181,426	4,935,283	610,000	5,545,283	4,935,283	6,214,427	9,300,000	15,514,427	6,214,427
D	132,942	44,830	11,494,726	1,037,000	12,531,726	11,494,726	3,565,027	671,000	4,236,027	3,565,027
E	16,711	600,000	798,117	305,000	1,103,117	798,117	20,551,940	9,300,000	29,851,940	20,551,940
F	16,711	464,000	798,117	305,000	1,103,117	798,117	15,893,500	9,300,000	25,193,500	11,654,239

The facilities are projected to be located within the utility service area of each city such that extensive construction of new utility connections (water supply, wastewater collection, electricity supply, and natural gas supply [Rapid City only]) would not be required.

Construction activities would involve the use of heavy equipment and support vehicles, resulting in a temporary increase in energy consumption attributable to fuel use. However, this fuel use would not adversely affect existing site utility systems as vehicles and equipment would likely be fueled offsite. Water and wastewater requirements during construction activities would also likely be provided by offsite sources and would not adversely affect existing utility systems.

4.14.2.2 Impacts from Operation

Water Supply and Wastewater Treatment

Water use for the proposed new facilities in Rapid City is projected at 13.9 million gallons per year. This is 0.4 percent of the total water produced by the Rapid City Public Works Department in 2011. Wastewater generation for the new facilities in Rapid City is projected at 12.7 million gallons per year. This is 0.4 percent of the total wastewater treated by the Rapid City wastewater treatment plant. Projected water use and wastewater generation are not expected to have an adverse impact on Rapid City utilities.

Water use for the proposed new facility in Hot Springs is projected at 1.1 million gallons per year, and wastewater generation is projected at 0.8 million gallons per year. The Hot Springs City Engineer stated that system capacity exists for new water users. The projected wastewater generation rate is significantly reduced from the current VAMC wastewater generation rate. The Hot Springs City Engineer noted that concerns have been raised regarding anaerobic conditions developing in the treatment plant clarifier due to average flows being significantly lower than the design flow. However, it is unknown at what average flow such conditions would develop (Bastian 2014). A significant reduction in inflow from VA operations could result in adverse impacts to the Hot Springs wastewater treatment plant.

Incorporation of water efficiency elements into facility design could reduce the water consumption rate and wastewater generation rate of new facilities.

Electricity

The new facilities would consume approximately 220,600 kilowatt-hours per year in the Hot Springs area and approximately 1,913,400 kilowatt-hours per year in the Rapid City area. This electricity consumption rate is projected to decrease from current operating conditions and would not result in an adverse impact to area electrical utilities. Incorporation of energy efficiency and renewable energy elements into facility design could further reduce the electricity consumption rate of new facilities.

Heating

Natural gas supply is available for consumers in the Rapid City area. The new facilities in Rapid City would consume approximately 7,500,000 ft^3/year (approximately 7,700 million Btu/year) of natural gas. This natural gas consumption would not result in an adverse impact to area natural gas utilities.

New facilities constructed in the Hot Springs area are assumed to consume propane for heating purposes. The new facility in Hot Springs would consume approximately 9,800 gallons per year of

propane. Fuel oil consumption at the existing facility would be reduced to that necessary to shutter and maintain buildings until eventual reuse. Adverse impacts on propane and fuel oil suppliers are not expected as a result of the new Hot Springs facility.

Incorporation of energy efficiency elements into facility design could reduce the natural gas and propane consumption rate of new facilities.

Communications

Telephone, television, and internet services are currently provided in both Hot Springs and Rapid City. Transferring these services to other facility locations in the area would not result in adverse impacts to area communication utilities.

4.14.3 Alternative B

The following assumptions pertain to the facilities under Alternative B:

- CBOC, Hot Springs – approximately 16,711 GSF, minimal landscape irrigation requirements
- RRTP (100-bed facility), Hot Springs – approximately 78,675 GSF, moderate landscape irrigation requirements
- MSOC, Rapid City – approximately 66,281 GSF, minimal landscape irrigation requirements

4.14.3.1 Impacts from Construction

The facilities are projected to be located within the utility service area of each city such that extensive construction of new utility connections (water supply, wastewater collection, electricity supply, and natural gas supply [Rapid City only]) would not be required.

Construction activities would involve the use of heavy equipment and support vehicles, resulting in a temporary increase in energy consumption attributable to fuel use. However, this fuel use would not adversely affect existing site utility systems as vehicles and equipment would likely be fueled offsite. Water and wastewater requirements during construction activities would also likely be provided by offsite sources and would not adversely affect existing utility systems.

4.14.3.2 Impacts from Operation

Water Supply and Wastewater Treatment

Water use for the new facility in Rapid City is projected at 5.5 million gallons per year. This is 0.2 percent of the total water produced by the Rapid City Public Works Department in 2011. Wastewater generation for the new facility in Rapid City is projected at 4.9 million gallons per year. This is 0.1 percent of the total wastewater treated by the Rapid City wastewater treatment plant. Projected water use and wastewater generation are not expected to have an adverse impact on Rapid City utilities.

Water use for the new facilities in Hot Springs is projected at 9.5 million gallons per year, and wastewater generation is projected at 8.5 million gallons per year. The Hot Springs City Engineer stated that system capacity exists for new water users. Additionally, the water rights held by the VA could be reused/transferred to accommodate the new facilities. The projected wastewater generation

rate is reduced from the current VAMC wastewater generation rate. The Hot Springs City Engineer noted that concerns have been raised regarding anaerobic conditions developing in the treatment plant clarifier due to average flows being significantly lower than the design flow. However, it is unknown at what average flow such conditions would develop (Bastian 2014). A reduction in inflow from VA operations could result in adverse impacts to the Hot Springs wastewater treatment plant.

Incorporation of water efficiency elements into facility design could reduce the water consumption rate and wastewater generation rate of new facilities.

Electricity

The new facilities would consume approximately 1,260,000 kilowatt-hours per year in the Hot Springs area and approximately 875,000 kilowatt-hours per year in the Rapid City area. This electricity consumption rate is projected to decrease from current operating conditions and would not result in an adverse impact to area electrical utilities. Incorporation of energy efficiency and renewable energy elements into facility design could further reduce the electricity consumption rate of new facilities.

Heating

Natural gas supply is available for consumers in the Rapid City area. The new facility in Rapid City would consume approximately 3,400,000 ft^3/year (approximately 3,500 million Btu/year) of natural gas. This natural gas consumption would not result in an adverse impact to area natural gas utilities.

New facilities constructed in the Hot Springs area are assumed to consume propane for heating purposes. The new facility in Hot Springs would consume approximately 55,900 gallons per year of propane. Fuel oil consumption at the existing facility would be reduced to that necessary to shutter and maintain buildings until eventual reuse. Adverse impacts on propane and fuel oil suppliers are not expected as a result of the new Hot Springs facility.

Incorporation of energy efficiency elements into facility design could reduce the natural gas and propane consumption rate of new facilities.

Communications

Telephone, television, and internet services are currently provided in both Hot Springs and Rapid City. Transferring these services to other facility locations in the area would not result in adverse impacts to area communication utilities.

4.14.4 Alternative C

The following assumptions pertain to the facilities under Alternative C:

- CBOC and RRTP (100-bed facility), Hot Springs – assumed CBOC would occupy 45,841 GSF within existing 134,918 GSF hospital building, continued use of 135,585 GSF in the domiciliary and administration building for a 100-bed RRTP, significant landscape irrigation requirements
- MSOC, Rapid City – approximately 66,281 GSF, minimal landscape irrigation requirements

4.14.4.1 Impacts from Construction

The new facility in Rapid City is projected to be located within the utility service area such that extensive construction of new utility connections (water supply, wastewater collection, electricity supply, and natural gas supply) would not be required.

Renovation activities at the Hot Springs VAMC would involve the use of heavy equipment and support vehicles, resulting in a temporary increase in energy consumption attributable to fuel use. However, this fuel use would not adversely affect existing site utility systems as vehicles and equipment would likely be fueled offsite. Water and wastewater requirements during renovation activities could be accommodated by existing onsite systems and would not adversely affect existing utility systems.

4.14.4.2 Impacts from Operation

Water Supply and Wastewater Treatment

Water use for the new facility in Rapid City is projected at 5.5 million gallons per year. This is 0.2 percent of the total water produced by the Rapid City Public Works Department in 2011. Wastewater generation for the new facility in Rapid City is projected at 4.9 million gallons per year. This is 0.1 percent of the total wastewater treated by the Rapid City wastewater treatment plant. Projected water use and wastewater generation are not expected to have an adverse impact on Rapid City utilities.

Water use and wastewater generation for the renovated facilities in Hot Springs are projected to decrease compared to current operation rates. Water use for the renovated facilities on the VA Hot Springs campus is projected at 15.5 million gallons per year based on the use rate assumptions stated above, and wastewater generation is projected at 6.2 million gallons per year based on the use rate assumptions. Water would continue to be supplied by the natural spring, at a decreased rate compared to the current 25.2 million gallons per year. The projected wastewater generation rate would also be expected to be reduced, as compared to the current VAMC wastewater generation rate of 11.7 million gallons. (Note that the use rate assumptions have overpredicted wastewater generation on the Hot Springs campus compared to current rates, but a reduction would be expected.) The Hot Springs City Engineer noted that concerns have been raised regarding anaerobic conditions developing in the treatment plant clarifier due to average flows being significantly lower than the design flow. However, it is unknown at what average flow such conditions would develop (Bastian 2014). A significant reduction in inflow from VA operations could result in adverse impacts to the Hot Springs wastewater treatment plant.

Incorporation of water efficiency elements into facility design could reduce the water consumption rate and wastewater generation rate of new and renovated facilities.

Electricity

The new and renovated facilities would consume approximately 2,395,000 kilowatt-hours per year in the Hot Springs area and approximately 875,000 kilowatt-hours per year in the Rapid City area. This electricity consumption rate is similar to current operating conditions and would not result in an adverse impact to area electrical utilities. Incorporation of energy efficiency and renewable energy

elements into facility design could further reduce the electricity consumption rate of new and renovated facilities.

Heating

Natural gas supply is available for consumers in the Rapid City area. The new facility in Rapid City would consume approximately 3,400,000 ft^3/year (approximately 3,500 million Btu/year) of natural gas. This natural gas consumption would not result in an adverse impact to area natural gas utilities.

Renovated facilities (and existing facilities) at the Hot Springs VAMC are assumed to continue use of fuel oil for heating purposes. The fuel oil consumption rate would be less compared to current operating conditions and would not result in an adverse impact to fuel oil suppliers.

Incorporation of energy efficiency elements into facility design could reduce the natural gas and fuel oil consumption rate of new and renovated facilities.

Communications

Telephone, television, and internet services are currently provided in both Hot Springs and Rapid City. Transferring these services to other facility locations or continuing services would not result in adverse impacts to area communication utilities.

4.14.5 Alternative D

The following assumptions pertain to the facilities under Alternative D:

- CBOC, Hot Springs – approximately 16,711 GSF, minimal landscape irrigation requirements
- RRTP (24-bed facility), Hot Springs – approximately 28,119 GSF, moderate landscape irrigation requirements
- MSOC, Rapid City – approximately 66,281 GSF, minimal landscape irrigation requirements
- RRTP (76-bed facility), Rapid City, SD – approximately 66,661 GSF, moderate landscape irrigation requirements

4.14.5.1 Impacts from Construction

The facilities are projected to be located within the utility service area of each city such that extensive construction of new utility connections (water supply, wastewater collection, electricity supply, and natural gas supply [Rapid City only]) would not be required.

Construction activities would involve the use of heavy equipment and support vehicles, resulting in a temporary increase in energy consumption attributable to fuel use. However, this fuel use would not adversely affect existing site utility systems as vehicles and equipment would likely be fueled offsite. Water and wastewater requirements during construction activities would also likely be provided by offsite sources and would not adversely affect existing utility systems.

4.14.5.2 Impacts from Operation

Water Supply and Wastewater Treatment

Water use for the new facilities in Rapid City is projected at 12.5 million gallons per year. This is 0.4 percent of the total water produced by the Rapid City Public Works Department in 2011. Wastewater generation for the new facilities in Rapid City is projected at 11.5 million gallons per year. This is 0.3 percent of the total wastewater treated by the Rapid City wastewater treatment plant. Projected water use and wastewater generation are not expected to have an adverse impact on Rapid City utilities.

Water use for the new facilities in Hot Springs is projected at 4.2 million gallons per year, and wastewater generation is projected at 3.6 million gallons per year. The Hot Springs City Engineer stated that system capacity exists for new water users. The projected wastewater generation rate is significantly reduced from the current VAMC wastewater generation rate. The Hot Springs City Engineer noted that concerns have been raised regarding anaerobic conditions developing in the treatment plant clarifier due to average flows being significantly lower than the design flow. However, it is unknown at what average flow such conditions would develop (Bastian 2014). A significant reduction in inflow from VA operations could result in adverse impacts to the Hot Springs wastewater treatment plant.

Incorporation of water efficiency elements into facility design could reduce the water consumption rate and wastewater generation rate of new facilities.

Electricity

The new facilities would consume approximately 590,000 kilowatt-hours per year in the Hot Springs area and approximately 1,755,000 kilowatt-hours per year in the Rapid City area. This electricity consumption rate is projected to decrease from current operating conditions and would not result in an adverse impact to area electrical utilities. Incorporation of energy efficiency and renewable energy elements into facility design could further reduce the electricity consumption rate of new facilities.

Heating

Natural gas supply is available for consumers in the Rapid City area. The new facilities in Rapid City would consume approximately 6,800,000 ft^3/year (approximately 7,100 million Btu/year) of natural gas. This natural gas consumption would not result in an adverse impact to area natural gas utilities.

New facilities constructed in the Hot Springs area are assumed to consume propane for heating purposes. The new facilities in Hot Springs would consume approximately 26,300 gallons per year of propane. Fuel oil consumption at the existing facility would be reduced to that necessary to shutter and maintain buildings until eventual reuse, preservation, or demolition. Adverse impacts on propane and fuel oil suppliers are not expected as a result of the new Hot Springs facilities.

Incorporation of energy efficiency elements into facility design could reduce the natural gas and propane consumption rate of new facilities.

Communications

Telephone, television, and internet services are currently provided in both Hot Springs and Rapid City. Transferring these services to other facility locations in the area would not result in adverse impacts to area communication utilities.

4.14.6 Alternative E

The following assumptions pertain to the facilities under Alternative E:

- Facility renovations/expansions, Hot Springs – assumed 600,000 GSF, significant landscape irrigation requirements
- CBOC, Rapid City – approximately 16,711 GSF, minimal landscape irrigation requirements

4.14.6.1 Impacts from Construction

CBOC operations in Rapid City would continue, presumably at the present facility location. Construction of new utility connections would not be required.

Renovation and expansion activities in Hot Springs would involve the use of heavy equipment and support vehicles, resulting in a temporary increase in energy consumption attributable to fuel use. However, this fuel use would not adversely affect existing site utility systems as vehicles and equipment would likely be fueled offsite. Water and wastewater requirements during construction and renovation activities can be accommodated by existing onsite systems and would not adversely affect existing utility systems.

4.14.6.2 Impacts from Operation

Water Supply and Wastewater Treatment

Water use for the existing CBOC facility in Rapid City is projected at 1.1 million gallons per year. This is 0.03 percent of the total water produced by the Rapid City Public Works Department in 2011. Wastewater generation for the existing CBOC in Rapid City is projected at 0.8 million gallons per year. This is 0.02 percent of the total wastewater treated by the Rapid City wastewater treatment plant. Projected water use and wastewater generation are not expected to have an adverse impact on Rapid City utilities.

Water use and wastewater generation for the renovated and expanded facilities in Hot Springs, SD are projected to increase from current operation rates. Water would continue to be supplied by the natural spring. If necessary, the Hot Springs City Engineer stated that system capacity exists for new water users, and increased flows to the wastewater treatment plant would help to alleviate concerns regarding anaerobic conditions developing in the treatment plant clarifier due to average flows being significantly lower than the design flow (Bastian 2014). Projected water use and wastewater generation are not expected to have an adverse impact on Hot Springs utilities.

Incorporation of water efficiency elements into facility design could reduce the water consumption rate and wastewater generation rate of new and renovated facilities.

Electricity

The renovated and expanded facilities would consume approximately 7,920,000 kilowatt hours per year in the Hot Springs area, and the current facility would consume approximately 220,000 kilowatt-hours per year in the Rapid City area. This electricity consumption rate would not result in an adverse impact to area electrical utilities. Incorporation of energy efficiency and renewable energy elements into facility design could further reduce the electricity consumption rate of new and renovated facilities.

Heating

Natural gas supply is available for consumers in the Rapid City area. The current facility in Rapid City would consume approximately 860,000 ft^3/year (approximately 900 million Btu/year) of natural gas. This natural gas consumption would not result in an adverse impact to area natural gas utilities.

Renovated and expanded facilities (and existing facilities) at the Hot Springs VAMC are assumed to continue use of fuel oil for heating purposes. The fuel oil consumption rate is assumed to be similar to current operating conditions and would not result in an adverse impact to fuel oil suppliers.

Incorporation of energy efficiency elements into facility design could reduce the natural gas and fuel oil consumption rate of new and renovated facilities.

Communications

Telephone, television, and internet services are currently provided in both Hot Springs and Rapid City. Transferring these services to other facility locations in the area would not result in adverse impacts to area communication utilities.

4.14.7 Alternative F

Under Alternative F, current operations would continue at the existing facilities at the Hot Springs VAMC and the CBOC in Rapid City. The following assumptions pertain to these facilities:

- VAMC, Hot Springs – assumed 464,000 GSF, significant landscape irrigation requirements
- CBOC, Rapid City – approximately 16,711 GSF, minimal landscape irrigation requirements

4.14.7.1 Impacts from Construction

CBOC operations in Rapid City would continue, presumably at the present facility location. Construction of new utility connections would not be required.

VAMC operations in Hot Springs would also continue, although some building renovations may be undertaken over time. Renovation activities in Hot Springs would involve the use of heavy equipment and support vehicles, resulting in a temporary increase in energy consumption attributable to fuel use. However, this fuel use would not adversely affect existing site utility systems as vehicles and equipment would likely be fueled offsite. Water and wastewater requirements during renovation could be accommodated by existing onsite systems and would not adversely affect existing utility systems.

4.14.7.2 Impacts from Operation

Water Supply and Wastewater Treatment

Water use for the CBOC facility in Rapid City is projected at 1.1 million gallons per year. This is 0.03 percent of the total water produced by the Rapid City Public Works Department in 2011. Wastewater generation for the new facility in Rapid City is projected at 0.8 million gallons per year. This is 0.02 percent of the total wastewater treated by the Rapid City wastewater treatment plant. Projected water use and wastewater generation are not expected to have an adverse impact on Rapid City utilities.

Water use and wastewater generation for the facilities in Hot Springs are projected to remain at current operation rates. Water would continue to be supplied by the natural spring. The potential for water use and wastewater generation rates to increase or decrease from current levels exists. If necessary, the Hot Springs City Engineer stated that system capacity exists for new water users, and increased flows to the wastewater treatment plant would help to alleviate concerns regarding anaerobic conditions developing in the treatment plant clarifier due to average flows being significantly lower than the design flow (Bastian 2014). Projected water use and wastewater generation are not expected to have an adverse impact on Hot Springs utilities.

Incorporation of water efficiency elements into facility design could reduce the water consumption rate and wastewater generation rate of new and renovated facilities.

Electricity

The existing facilities would consume approximately 6,125,000 kilowatt-hours per year in the Hot Springs area, and the current facility would consume approximately 220,000 kilowatt-hours per year in the Rapid City area. This electricity consumption rate would not result in an adverse impact to area electrical utilities. Incorporation of energy efficiency and renewable energy elements into facility design could further reduce the electricity consumption rate of new and renovated facilities.

Heating

Natural gas supply is available for consumers in the Rapid City area. The current facility in Rapid City would consume approximately 860,000 ft^3/year (approximately 900 million Btu/year) of natural gas. This natural gas consumption would not result in an adverse impact to area natural gas utilities.

Existing facilities at the Hot Springs VAMC are assumed to continue use of fuel oil for heating purposes. The fuel oil consumption rate is assumed to be similar to current operating conditions and would not result in an adverse impact to fuel oil suppliers.

Incorporation of energy efficiency elements into facility design could reduce the natural gas and fuel oil consumption rate of new and renovated facilities.

Communications

Telephone, television, and internet services are currently provided in both Hot Springs and Rapid City. The No Action Alternative would not result in adverse impacts to area communication utilities.

4.14.8 Supplemental Alternative G

Under Supplemental Alternative G, some or all of the existing facilities on the VA Hot Springs campus would be reused by other tenants. Depending on the intended use, some facility renovation may be required.

4.14.8.1 Impacts from Construction

If required, renovation activities in Hot Springs would involve the use of heavy equipment and support vehicles, resulting in a temporary increase in energy consumption attributable to fuel use. However, this fuel use would not adversely affect existing site utility systems as vehicles and equipment would likely be fueled offsite. Water and wastewater requirements during construction and demolition activities could be accommodated by existing onsite systems and would not adversely affect existing utility systems.

4.14.8.2 Impacts from Operation

Water Supply and Wastewater Treatment

If VAMC facilities are repurposed, water use and wastewater generation in Hot Springs could increase. Water could continue to be supplied to the repurposed facilities by the natural spring. If necessary, the Hot Springs City Engineer stated that system capacity exists for new water users, and increased flows to the wastewater treatment plant would help to alleviate concerns regarding anaerobic conditions developing in the treatment plant clarifier due to average flows being significantly lower than the design flow (Bastian 2014). Projected water use and wastewater generation are not expected to have an adverse impact on Hot Springs utilities.

Incorporation of water efficiency elements into facility design could reduce the water consumption rate and wastewater generation rate of new and renovated facilities.

Electricity

If Hot Springs VAMC facilities are repurposed, regional electricity consumption could increase. The level of increase would depend on the extent to which facilities are repurposed and the function of the tenant, but would not be expected to result in an adverse impact to area electrical utilities. Incorporation of energy efficiency and renewable energy elements into facility design could further reduce the electricity consumption rate of new and renovated facilities.

Heating

Repurposed facilities at the Hot Springs VAMC are assumed to continue use of fuel oil for heating purposes, although conversion to propane could be considered. The fuel oil or propane requirement would depend on the extent to which facilities are repurposed and the function of the tenant, but would not be expected to result in an adverse impact to fuel oil or propane suppliers.

Incorporation of energy efficiency elements into facility design could reduce the fuel oil or propane consumption rate of new and renovated facilities.

Communications

Telephone, television, and internet services are currently provided in Hot Springs and available to new users. The supplemental alternative would not result in adverse impacts to area communication utilities.

4.15 Environmental Justice

4.15.1 Evaluation Criteria

An analysis of environmental justice determines whether a disproportionate share of adverse human health or environmental impacts from implementing a federal action would be borne by minority or low-income populations.

The CEQ (1997) guidance states that, to determine whether impacts to minority or low-income populations are disproportionately high and adverse, agencies should consider the following:

- For human health effects (including bodily impairment, infirmity, illness, or death), whether:
  - Risks or rates of health effects are significant (as the term is used in NEPA analyses) or above generally accepted norms
  - The risk or rate of exposure to an environmental hazard for a minority or low-income population is significant and appreciably exceeds or is likely to exceed the risk or exposure rate for the general population.
  - Health effects occur in a minority or low-income population affected by cumulative or multiple adverse exposures from environmental hazards
- For environmental effects (ecological, cultural, human health, economic, or social impacts), whether:
  - There is or would be an impact on the natural or physical environment that significantly and adversely affects a minority or low-income population when those impacts are interrelated to impacts on the natural or physical environment
  - Environmental effects are significant (as the term is used in NEPA analyses) and are or may be having an adverse impact on minority or low-income populations that appreciably exceeds or is likely to appreciably exceed those on the general population
  - The environmental effects occur or would occur in a minority or low-income population by cumulative or multiple adverse exposures from environmental hazards

As described in Section 3.15, the affected area for the environmental justice analysis is the VA BHHCS service area, including counties in the states of South Dakota, Nebraska, and Wyoming. The South Dakota counties of Bennett, Corson, Dewey, Jackson, Lyman, Mellette, Oglala Lakota, Todd, and Ziebach are environmental justice communities in the VA BHHCS service area based on guidance in CEQ (1997), as described in Section 3.15.1.2. There are no environmental justice communities in the VA BHHCS service area in Nebraska or Wyoming. Therefore, the environmental justice impact analysis for the reconfiguration proposal is limited to the nine South Dakota counties listed above. Fall River and Pennington Counties, where the physical effects of any alternative would occur, do not have any environmental justice communities.

Section 2.1 provides a discussion of the improved geographic access to health care—including primary, secondary, and tertiary care—that would be available throughout the catchment area under the VA BHHCS services reconfiguration proposal. Overall, the services reconfiguration proposal improves geographic access, as summarized in Table 2-2 in Section 2.1. While services are not a

focus of the impact analysis in this EIS (see Section 1.3), it is important to note that this would be a beneficial effect for all Veterans in the catchment area, including those in minority and low-income populations. Attaining improved geographic access to care in this rural health care system is one of the main objectives of the services reconfiguration resulting in VA's proposed changes to the facilities in Hot Springs and Rapid City.

4.15.2 All Alternatives – Construction

Construction impacts to all resources would be limited to the vicinity of the construction in the areas of Hot Springs (Fall River County) and Rapid City (Pennington County). Neither of these counties was defined as having an environmental justice community; thus, environmental or health impacts would not be disproportionately borne by any environmental justice community.

Construction sites that are in close proximity to areas with higher concentrations of children, such as schools or parks, could attract unauthorized entry by children. Active construction sites are generally monitored or secured by fencing so the potential for unauthorized entry resulting in a safety risk would be minimal. Construction would not have environmental health risks or safety risks that would disproportionately affect children.

4.15.3 All Alternatives – Operation

The operational impacts of the reconfiguration under any alternative would occur predominantly in the areas of Hot Springs (Fall River County) and Rapid City (Pennington County). Neither of these counties was defined as having a minority or low-income population; thus, environmental or health impacts would not be disproportionately borne by any environmental justice community. The reconfiguration under any alternative would not affect the existing VA BHHCS facilities located in the counties that have minority or low-income populations: a therapy program office in McLaughlin (Corson County), CBOCs in Eagle Butte and Isabel (Dewey County), CBOC and compensated work therapy facility in Pine Ridge (Oglala Lakota County), and a CBOC in Mission (Todd County).

Improving travel time to access health care is one of the underlying conditions that contribute to the need for the VA BHHCS reconfiguration proposal (see Section 1.2.2.2.2, *Distance Veterans Must Travel for Care*). Alternatives A, B, C, or D would improve overall geographic access to care (see Table 2-2 in Chapter 2). As summarized in Table 2-1 in Chapter 2, primary and specialty health care services under Alternatives A, B, C, or D would continue in Hot Springs at a new CBOC, renovated Building 12 on the campus, or community facilities, and services would expand at a new MSOC in the Rapid City area where more Veterans are served. The changes in travel time and distance to receive care would benefit most Veterans in the VA BHHCS catchment area. For Veterans who are closer to Hot Springs than Rapid City, the change in location of VA's RRTP services from Hot Springs to Rapid City under Alternative A is the only service for which the distance would increase. This change to travel time and distance would not be disproportionately borne by Veterans from minority or low-income populations any more so than Veterans from the general population; therefore, this would not be an environmental justice impact. Alternatives E and F would retain the current levels of geographic access, with no beneficial effect to travel time and distance.

Supplemental Alternative G is limited to potential re-use scenarios at the VA Hot Springs campus. Although the nature of any such re-use has not yet been determined, any effects are expected to be

localized, with no potential for adverse operational impacts to environmental justice populations in the nine listed counties.

The operations conducted under any alternative for the VA BHHCS reconfiguration proposal would continue to be provision of health care services to Veterans and their families, and would not have environmental health risks or safety risks that would disproportionately affect children.

4.16 Cumulative Impacts

Section 3.16 identified the other past, present, and reasonably foreseeable future actions that may occur within the VA BHHCS service area. Actions in Hot Springs include expansion of the State Veterans Home, updating and relocating a community nursing home, new water distribution, and highway repair and reconstruction. Actions in Rapid City include new electricity transmission, road improvements and reconstruction, and residential developments.

Scoping for this EIS included requests that the cumulative impact analysis evaluate the effects of VA's changes to health care services at the Hot Springs VAMC since the mid-1990s. However, these changes related only to the offering of specific health care services from various locations, and are not subject to NEPA review (see Section 1.3).

Cumulative impacts from these actions or other potential future actions together with those of any of the EIS alternatives are expected to be absent, negligible or minor for aesthetics, air quality, geology and soils, hydrology and water quality, wildlife and habitat, noise, floodplains and wetlands, community services, solid waste and hazardous materials, utilities, and environmental justice. Any impacts to these resources would be similar to current VA health care services operations or to other new private and commercial developments that may occur within Hot Springs and Rapid City, and would include mitigation measures to minimize impacts as described in Chapter 5.

Cultural Resources

Direct or indirect adverse effects to historic properties from implementing any of the reconfiguration alternatives could further diminish the integrity of that property should any of the other past, present, or reasonably foreseeable projects also adversely affect the same property.

There could be a cumulative indirect 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, cause substantial contrasts to the historic setting, feeling, and association of the Historic District.

Changes in local economic conditions could alter the use and upkeep of historic commercial areas in Hot Springs and Rapid City and have the potential for indirect effects to accumulate on such historic properties. However, ongoing and planned construction projects in Hot Springs and Rapid City, including proposed construction for the reconfiguration alternatives, would cumulatively benefit local economies, and indirectly benefit historic properties. There would be no impacts to the economies of Hot Springs or Rapid City from changes in employment under any reconfiguration alternative that, together with changes in employment associated with other development projects, could result in significant cumulative indirect effects to historic properties.

There could be cumulative adverse effects to archaeological resources from ground disturbance in the Hot Springs and Rapid City areas from ongoing and planned construction, together with construction proposed for the reconfiguration alternatives. The significance of any cumulative adverse effect would depend on the extent of archaeological resources encountered, and how other projects mandatorily or voluntarily address such resources.

Land Use

For alternatives that include construction (A, B, C, and D), the potential for cumulative impacts related to land use depends on the specific site(s) selected and the existing adjacent and nearby land uses. Construction of a new VA facility, particularly if it is in an area in which other building or roadway construction is ongoing, could have a short-term adverse effect on residents or businesses use and enjoyment of their property in case of increased noise and traffic; this type of cumulative effect would be temporary, occurring only while the construction projects overlap in time. For Supplemental Alternative G, possible non-federal re-use scenarios could increase the locations in Hot Springs available for various uses, competing with existing private and commercial parcels that may be offered to potential users.

Socioeconomic Conditions

There could be cumulative impacts to the economy of Fall River County if the schedules of the larger construction projects listed in Table 3.16-1 overlap with construction for the reconfiguration proposal. The construction industry could experience short-term impacts if the industry is not able to locate and employ an adequate number of workers with the appropriate skills. The construction workforce for overlapping projects could have a cumulative impact on the demand for local housing and accommodations, particularly during the peak tourist season. Although these cumulative impacts could overlap for the VA facility construction period (estimated to be two to three years), the impacts would be considered short-term and overall beneficial to the local economy. The increase in employment anticipated with Alternative E and possibly Supplemental Alternative G could induce growth in other similar businesses and thus create a further demand on the available labor force. This cumulative impact could be adverse if the induced growth creates competition for the same employment sector needed to successfully implement the reconfiguration or re-use alternatives.

Transportation and Traffic

There could be possible short-term cumulative impacts to traffic circulation if a site selected for a new VA facility in Hot Springs or Rapid City is near or mainly accessed by a travel route that is undergoing or planned for roadway improvements or reconstruction. The vehicle trips added to the local area by the construction and operation of VA facilities could further increase traffic congestion beyond what the locality would have experienced due to the roadway project alone, in the absence of the VA-related traffic. This cumulative impact would be temporary. A travel route that would serve the site selected for a new VA facility in Rapid City could be the same route that would serve areas planned for residential and commercial development. There could be a cumulative impact if the daily vehicle trips to and from the VA facility would exceed the safe and efficient design function of the travel route planned to serve future development. However, any cumulative impact would not be significant because the traffic projections and long-range planning conducted by the City of Rapid City extend to 2035 (with an update underway to 2040) and include development scenarios similar to the proposed VA facility.

4.17 Potential for Generating Substantial Controversy

As discussed in Chapter 6, VA has solicited input from various federal, state, and local government agencies regarding the reconfiguration proposal, and has conducted town halls, scoping meetings, and other outreach regarding the details of this effort. The public and agencies will now have an opportunity to comment on this Draft EIS, with their input incorporated into the Final EIS.

Before the Notice of Intent for this EIS was published, the local community, particularly in Hot Springs, organized against the reconfiguration proposal and developed a detailed alternative, which has been analyzed in this EIS as Alternative E.

As communicated throughout the public participation events and scoping meetings, and re-stated in Section 2.2 of this EIS, Alternatives A through D involve expansion into new facilities in Rapid City while maintaining a presence in Hot Springs. **There was a common misconception during scoping, also appearing in subsequent editorials and social media posts, that expansion in Rapid City meant that all services in Hot Springs would be discontinued. VA has clearly stated, and reiterates in this EIS, that continuation of outpatient primary care services in Hot Springs (either at the current location or a different facility) is and always has been part of every alternative.**

A summary of the public scoping process and the comments received is included in Appendix B, and can also be viewed at the VA BHHCS webpage (www.blackhills.va.gov/vablackhillsfuture).

Since the project was first announced, several dozen newspaper articles have been published in local newspapers regarding the reconfiguration proposal.

In summary, VA BHHCS reconfiguration proposal is associated with public controversy. The issues of concern to the public that were identified through the scoping process and that are within the scope of the analysis for this EIS (see Section 1.3) have been evaluated in this impact analysis.

4.18 Unavoidable Adverse Impacts

Unavoidable adverse impacts are those that would occur if an alternative was implemented. In many cases, adverse impacts that were identified and evaluated in this chapter are avoidable through following agency policies, procedures, and directives; complying with federal, state, and local requirements; and applying best management practices, including those listed in Chapter 5.

Because site selection for potential new VA facilities (whether new construction, lease, or renovation of an existing non-VA facility) has not occurred, any adverse impact that could occur simply because of a new VA facility being sited in a particular location would be considered avoidable. For example, if a site has endangered species habitat that would be eliminated to construct the VA facilities, the adverse impact to the endangered species can be avoided by selecting a different site. As stated in Section 2.2, VA would follow departmental facility specifications, standards, and guidelines in any site selection, planning, design, and construction for a new CBOC, MSOC, or RRTP. These requirements include those that are available online for public access from the Technical Information Library of VA's Office of Construction & Facilities Management (www.cfm.va.gov/til/).

The following unavoidable adverse impacts have been identified.

Air Quality: Construction- or renovation- and operation-related air emissions, within permit limits, would occur under each alternative. These emissions would be mitigated to acceptable levels by compliance with permit limits and regulatory requirements.

Cultural Resources and Historic Properties: A change in the character of use that contributes to the historic significance of the Battle Mountain Sanitarium NHL would be an unavoidable adverse impact under Alternatives A, B, and D; and Supplemental Alternative G. Introducing visual or audible elements to the historic setting of the Battle Mountain Sanitarium NHL during construction would be a temporary unavoidable adverse impact under Alternatives C, E, and F; and Supplemental Alternative G. Introducing new development within the Battle Mountain Sanitarium NHL could diminish the integrity of historic features such as setting or design, which would be an unavoidable adverse impact under Alternative E. Mitigation for these impacts will be identified with consulting party input; see Chapter 5, Mitigation, Monitoring, Minimization, and Best Practices.

Noise: Construction- and renovation-related noise and vibration impacts would occur to varying degrees under each alternative, as would ongoing minor noise from operations. The intensity of noise impacts would depend on locations compared to receptors, and would be mitigated by daytime scheduling of construction activities and shielding where appropriate.

Socioeconomics: The reduction in FTEEs and wages would be an unavoidable adverse impact to some local economies of the VA BHHCS service area.

Solid Waste and Hazardous Materials, Utilities: Construction and renovation would generate solid waste and, for renovation of older facilities, specialty wastes (asbestos-containing materials, lead-based paint). Solid, medical, and hazardous waste would be generated by operation of facilities. Energy (electricity, propane, natural gas, fuel oil) and water would be consumed during construction and operation. VA BHHCS would continue to comply with VA's Waste Prevention and Recycling Program, strategic sustainability performance plan (update in progress in accordance with Executive

Order 13693), Sustainability Management Policy, and related agency guidance to minimize waste generation and improve energy and resource efficiency.

Transportation and Traffic: Construction vehicles and haul trucks traveling on roadways and accessing the construction site could have short-term unavoidable impacts to other motorists.

4.19 Relationship between Short-Term Uses of the Environment and the Maintenance and Enhancement of Long-Term Productivity

CEQ's NEPA regulations (40 CFR 1502.16) require consideration of the relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity. This involves considering whether an alternative would sacrifice a resource value that might benefit the environment in the long-term for some short-term value to the government or the public. In this analysis, short-term refers to a time span of approximately five years, including continued uses that would not change and the construction and initial operation of any new facilities. Long-term refers to VA's ongoing operation of existing or new facilities for as long as the location is operated by VA and all time thereafter.

Short-term uses are generally those that determine the present quality of life for the public, including Veterans utilizing VA health care services, VA BHHCS employees, and the local community. The current use of the Hot Springs VAMC and Rapid City CBOC is that of facilities providing health care services to Veterans and their families. The short-term uses of the environment associated with implementing any of the alternatives would be those typical of operating a medical hospital or clinic or residential facility. Table 4.19-1 summarizes the current use of each existing and potential facility location, and how that use would change under each alternative.

Table 4.19-1. Existing and Future Uses.

Location / Facility and Existing Use	Change to Use, by Alternative						
	A	B	C	D	E	F	G (supplemental)
Hot Springs VAMC: VA health care	No VA health care	No VA health care	Decreased intensity	No VA health care	Increased intensity	No change	Unknown
New Hot Springs CBOC (+RRTP): current use unknown (location not selected)	VA health care (CBOC only)	VA health care	NA	VA health care	NA	No change	NA
Rapid City CBOC: VA health care	No VA health care	No VA health care	No VA health care	Non-VA	No change	No change	NA
New Rapid City MSOC (+RRTP): current use unknown (location not selected)	VA health care	VA health care (MSOC only)	VA health care (MSOC only)	VA health care	NA	No change	NA

NA = not applicable.

Long-term productivity for a medical facility refers to its capability to support and improve the health of patients seeking care, which is a component of the human environment. Alternatives A through E would improve one or more aspects of the long-term productivity of the VA BHHCS medical facilities in Hot Springs and Rapid City by increasing access, improving service locations

compared to patient populations, or increasing levels of service in one of the cities. The clear goal of VA's proposal to reconfigure VA BHHCS health care services is to maintain and enhance the long-term productivity (capacity to provide health care for Veterans) of its facilities.

With the exceptions of economic conditions in the City of Hot Springs, land selected for new construction, and construction waste generation, no measurable difference in the current level of impact to long-term productivity of the human or natural environment is expected, regardless of changes that may be made in the location and levels of activities at VA facilities in Hot Springs and Rapid City:

- Alternatives that decrease VA's operations in Hot Springs (A, B, C, D; whether at the existing VAMC or elsewhere) would also decrease the VA-related input to the local economy, including local employment, purchase of goods and services by VA, and utilization of local businesses by employees and patients. However, under Alternatives A, B, C, and D, the existing Hot Springs VAMC campus would be made partially or fully available for re-use, with associated input to the Hot Springs economy that would partially, fully, or more than offset the decrease in VA-related local economic input. Thus, Alternatives A through D's impact on the long-term productivity of economic conditions in Hot Springs may be a decrease, little change, or an enhancement, depending on the concurrent implementation of Supplemental Alternative G and the features of the specific re-use plan.
- Construction being considered by VA BHHCS under Alternatives A, B, C, and D could result in disturbance, use, and long-term decreased productivity of relatively small amounts of previously undisturbed land. The potential locations in Hot Springs and Rapid City for a new CBOC, RRTP(s), and MSOC have not been identified but are expected to be within city limits, with a zoned land use that would accommodate, or that the respective city would be willing to revise to accommodate, a VA health care services facility. Location selection and facility design would consider and seek to minimize any potential for impacts to the environmental values and characteristics of the natural and human environment.
- Ongoing management of sanitary solid waste and medical waste generated by existing or new locations would continue to require the use of energy and space at local or regional disposal facilities. Construction debris would similarly require appropriate disposal. Land used for waste management requires a permanent commitment of terrestrial resources, preventing its long-term environmental productivity. A VA health care facility would not constitute a novel waste source nor generate more than a minor or negligible portion of the volume of the waste handled by a facility; thus, it would have a similarly minor or negligible contribution to the lack of long-term productivity of the land used for disposal. Adequate landfill capacity has already been developed in the area to accommodate any construction waste associated with the alternatives, and thus would also have a minor or negligible contribution to the lack of long-term productivity of the land used for its disposal.

4.20 Irreversible or Irretrievable Commitments of Resources

The CEQ NEPA regulations (40 CFR 1502.16) require an analysis of irreversible and irretrievable commitments of resources, such as the use or consumption of a resource that is neither renewable nor recoverable, or the unavoidable destruction of environmental resources. Irreversible and irretrievable commitments of resources from the VA BHHCS alternatives include fossil fuel-based energy consumption and use of nonrenewable materials for construction and operation. Construction, operation, and transportation would mainly rely on fossil fuel-based energy to run construction equipment; supply heat, air conditioning, and electricity for operation of the medical facilities; and power private, public, and volunteer transportation of patients to and from the facilities. Energy would be consumed in the form of gas- and oil-generated electricity, fuel oil, natural gas, propane, gasoline, and diesel fuel. Materials from nonrenewable sources used for construction and operation include those produced from mined materials (such as metals) or petroleum-based plastics, polymers, and other materials.

In compliance with Executive Order 13693, VA's pending update to its strategic sustainability performance plan will, in part, identify approaches for reducing energy use and cost, finding renewable or alternative energy solutions, and using recycled and sustainably produced materials. The provisions of the updated plan will be applied agency-wide, including during implementation of the selected alternative from this EIS process, reducing the irreversible and irretrievable commitment of resources.

5.0 MITIGATION, MONITORING, MINIMIZATION, AND BEST PRACTICES

The Council on Environmental Quality (CEQ) *National Environmental Policy Act* (NEPA) regulations (40 Code of Federal Regulations [CFR] 1508.20) state that mitigation includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action
- Compensating for the impact by replacing or providing substitute resources or environments

Mitigation also includes resolution of adverse effects identified through the integrated *National Historic Preservation Act* (NHPA) Section 106 consultation process; see Section 5.2.

The measures and best practices identified in this environmental impact statement (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. The record of decision (ROD) for an EIS binds an agency to implement specific mitigation commitments stated in the ROD. In addition, compliance with regulatory requirements is enforced by the respective regulatory agency. For example, compliance with air quality regulations would be enforced by the South Dakota Department of Environment and Natural Resources. Where relevant for a particular alternative, the following mitigation, monitoring, minimization, and best practices can reduce the adverse impacts that were identified in Chapter 4.

If the characteristics of the proposed site(s) for a new facility in either Hot Springs or Rapid City could be associated with potential environmental impacts not evaluated in this EIS, additional NEPA review would be undertaken and would incorporate the measures described in this chapter.

5.1 Resources other than Cultural Resources

5.1.1 Aesthetics

Any security lighting used during construction would be directed downward to minimize light trespass onto adjacent property and land uses.

VA would consult with local officials and consider recommendations on setbacks, landscaping, lighting, and aesthetic qualities of buildings in accordance with 40 United States Code 619(c) and (d).

5.1.2 Air

The U.S. Department of Veterans Affairs (VA) Black Hills Health Care System (VA BHHCS) would comply with the South Dakota Natural Events Action Plan; and Pennington County Ordinance 12,

and Rapid City Code of Ordinance 8.34, both of which are titled *Fugitive Emissions and the Abatement of Smoke*, where applicable. The Natural Events Action Plan applies to the west Rapid City area and requires, in part, voluntary cessation of construction or use of control measures during high wind dust alerts.

Pennington County Ordinance 12 and Rapid City Code of Ordinance 8.34 also identify reasonably available control technology requirements for minimizing fugitive dust during construction activities, including but not limited to:

- Wetting down
- Chemical stabilization
- Applying dust palliative
- Minimization of area disturbed
- Reclamation of disturbed area as soon as possible
- Vehicular speed limitation
- Cleaning of paved areas

New construction would comply with the *VA Design Guide for Mental Health Facilities*, in which the U.S. Green Building Council Leadership in Energy and Environmental Design Project Certification is a recommended standard. The following codes and standards would be followed for new construction at a minimum:

- *Energy Policy Act of 2005*
- Energy Efficiency Standards and Energy Code for New Federal Commercial and Multi-Family Residential Buildings (10 CFR Parts 433, 434 and 435)
- The 16-agency (including VA) memorandum of understanding committing to design, construct, and operate their facilities in an energy-efficient and sustainable manner (Federal Leadership in High Performance and Sustainable Buildings)
- Executive Order 13423, *Strengthening Federal Environmental, Energy, Transportation Management*
- Executive Order 13148, *Greening the Government through Leadership in Environmental Management*
- VA's strategic sustainability performance plan (in preparation), which will specify agency plans and procedures for complying with Executive Order 13693, *Planning for Federal Sustainability in the Next Decade*. This order states, in part, that federal agencies should propose greenhouse gas emission reduction targets and decrease fleet inventories and mobile source greenhouse gas emissions.

5.1.3 Geology and Soils

Construction- and operation-related geology and soils impacts, including erosion and sedimentation impacts, would be minimized through implementation of the following:

- Design, install, and maintain erosion and sediment controls during the duration of construction activities and any subsequent soil disturbance activities near site drainages. Such controls may include silt fences, runoff control berms, erosion control fabric, and rip-rap.
- Minimize the amount of exposed soils at any given time during construction activities. Quickly revegetate disturbed areas following completion of activities.

- Minimize the disturbance of steep slopes.
- Provide an undisturbed natural buffer between the activity area and surface drainages, and direct stormwater runoff to vegetated areas.
- Develop a stormwater pollution prevention plan, consistent with the requirements of the National Pollutant Discharge Elimination System general permit.
- Implement spill and leak prevention and response procedures.
- Use appropriate dust control methods during construction activities. Dust control methods include water sprays, chemical soil additives, and wheel washers.
- Suspend construction activities during periods of high winds.

5.1.4 Hydrology and Water Quality

Construction- and operation-related hydrology and water quality impacts, including erosion and sedimentation impacts, would be minimized through implementation of the best management practices listed above for Geology and Soils. Additional impacts would be minimized through implementation of the following:

- Design new facilities to minimize the area of impervious surfaces.
- Route stormwater runoff from impervious surfaces to stormwater retention and drainage areas.
- Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the project area, to reduce the impacts of incidental releases of vehicle fluids.
- Design onsite construction staging areas to minimize stormwater runoff from these areas directly to drainages.

5.1.5 Wildlife and Habitat

During site selection for new construction, review potential locations for the presence of sensitive ecological resources and protected species and include a preference to avoid such locations.

Prior to construction, survey the proposed site for nests of migratory birds in accordance with the *Migratory Bird Treaty Act*.

For construction on greenfield sites, make efforts to preserve existing natural features and significant vegetation and avoid impacts to sensitive resources as part of the site selection process, consistent with VA siting guidelines, including:

- Preserve and conserve natural features and significant vegetation, especially trees and shrubs (including sensitive habitat), for environmental protection (reduce maintenance and enhance sustainability).
- Preserve existing trees, forests, wetlands and landscape features that are important resources and visual assets; site analysis and planting design would identify, retain and protect mature trees and vegetation, whenever reasonably possible.

- Minimize site disturbance and modification to natural topography.
- Concentrate development in areas with minimal non-engineered slopes and existing infrastructure.
- Mitigate any construction disturbance.
- Minimize creation of impervious surfaces.
- Maximize use of existing drainage patterns and features.
- Use required buffers/setbacks to restrict access if any wetlands or protected waterways are on the site; all wetlands and waterways on federal lands must be identified and protected throughout the site design and construction process and after the project is finished.

Protect aquatic species habitat by implementing best management practices and conforming to National Pollutant Discharge Elimination System permit requirements (see measures listed for Geology and Soils and for Hydrology and Water Quality, above).

Conduct pre-construction surveys and coordination/consultation with the U.S. Fish and Wildlife Service and the South Dakota Department of Fish and Game, as appropriate, to ensure that impacts on any sensitive animal and plant species in the vicinity of the selected site are negligible and that appropriate mitigation actions are implemented. Mitigation measures would include site development plans that avoid disturbing species or habitat, timing activities to avoid critical timeframes such as breeding season, or relocating sensitive species away from areas likely to be disturbed. Regulatory agencies would be consulted in developing and applying appropriate mitigation.

5.1.6 Noise

Construction- and operation-related noise impacts would be minimized through implementation of the following:

- Limit outdoor construction activities using heavy equipment to daylight hours.
- Properly maintain and muffle equipment such that the equipment sound levels specified in the VA Master Construction Specifications, *Temporary Environmental Controls* are not exceeded.
- Monitor area noise levels at least once every five days during high noise generating activities.
- Maintain sound shielding around the project site during high noise generating activities.
- Minimize equipment idling, and shut down construction equipment when not in use.
- Design new facilities and renovated facilities to utilize berms, tree lines, and vegetative buffers for additional sound shielding of operational activities.
- Upon determining the location of new facilities, conduct a survey of the preexisting condition of neighboring facilities and receptors for both potential noise and vibration impacts. Consider site-specific impact minimization actions.

5.1.7 Land Use

VA BHHCS would notify and coordinate with property owners adjacent to the selected sites for a community-based outpatient clinic, multi-specialty outpatient clinic, and residential rehabilitation treatment program to minimize disturbance to land uses during construction. Construction would occur during daytime hours to minimize disruption to residential areas. Construction would not block ingress/egress to adjacent businesses during their business hours of operation.

If the campus is transferred out of federal ownership, VA BHHCS would require the re-use proponent to coordinate with the City of Hot Springs to ensure compliance with the city's current land use plan and zoning, or would become compliant through a waiver or revision to the plan or zoning. VA BHHCS would also ensure a transfer agreement is developed in accordance with NHPA consultation requirements and that it includes conditions and restrictions to ensure the prospective landowner would maintain the integrity of the National Historic Landmark status of the site.

5.1.8 Floodplains and Wetlands

VA BHHCS would conduct field surveys to identify and determine the jurisdiction of any wetlands as part of the site selection process.

Site design would avoid jurisdictional (regulated) wetlands to the extent practicable. If jurisdictional (regulated) wetlands cannot be avoided, VA BHHCS would develop a mitigation plan to compensate for the lost function and value of wetlands either by creating or enhancing other wetlands onsite or at an offsite location through an established mitigation bank, or through an in-lieu fee program.

5.1.9 Socioeconomics

The impacts to employment associated with the reduction in the number of full-time equivalent employees needed to operate VA facilities would be minimized through eligible retirements and offers for voluntary early retirements, buy-outs, re-training, and transfers to other positions within the VA BHHCS service area.

Alternative E could strain the capacity of Fall River County to absorb the major increase of employees proposed to implement this alternative. VA BHHCS would coordinate with the City of Hot Springs, Fall River County, and Save the VA organization in the community's planning for the anticipated increased demands on housing and infrastructure.

5.1.10 Community Services

VA BHHCS would update support agreements with local law enforcement agencies to reflect the change in VA police presence and security patrols for VA facilities in Hot Springs and Rapid City.

VA BHHCS police would monitor for increases in incidents due to the unoccupied Hot Springs campus that require police response, and respond accordingly to protect VA facilities, such as by increasing the frequency of patrols by VA police.

VA BHHCS would require the general contractor(s) to manage accident, fire, and security risks such that requests for emergency response by medical, fire, or police would not exceed the capacity of

these providers in Hot Springs or Rapid City. This would be accomplished by ensuring the general contractor(s) follow VA Construction Specification Section 01-35-26 "Safety Requirements" and prepare and implement an accident prevention plan and fire safety plan; and follow Section 01-00-00 "General Requirements, Construction Security" and prepare a plan to secure the construction site.

5.1.11 Solid Waste and Hazardous Materials

Construction- and operation-related solid waste and hazardous materials impacts would be minimized through implementation of the following:

- Conduct proper vehicle maintenance and inspection to reduce the potential for incidental releases of vehicle fluids.
- Maximize reuse and recycling of wastes to minimize quantities destined for disposal. Conduct facility renovation/demolition such that valuable facility components may be reused or recycled.

5.1.12 Transportation and Traffic

VA BHHCS would coordinate with the Hot Springs Engineering Department and the Rapid City Public Works Department to address transportation-related requirements during the site selection process for new facilities.

VA BHHCS would prepare traffic control plans in coordination with the Hot Springs Engineering Department and the Rapid City Public Works Department to address construction-related road closures, detours, and haul truck routes to minimize disruption to traffic flow, maintain access to any businesses and residential areas near the construction sites, and provide safe passage for pedestrians and bicyclists.

VA BHHCS would coordinate with the Hot Springs Engineering Department and Rapid City Public Works Department on any requirements to complete a traffic study for the selected site(s) for new facilities, and incorporate appropriate roadway improvements into a site design. Improvements to minimize adverse traffic impacts at a site could include roadway resurfacing, drainage (curb and gutter), accessible sidewalks, crosswalks, turn lanes, bicycle lanes, intersection signalization (traffic light, four-way stop), and bus turn-outs.

VA BHHCS would coordinate with the Rapid Transit System to encourage the expansion of bus service to accommodate any projected increase in ridership, including the extension of bus route(s), additional bus stop(s), and shelter(s) at new facilities in Rapid City.

If the campus is transferred out of federal ownership, VA BHHCS would require the re-use proponent to coordinate with the Hot Springs Engineering Department to ensure the re-use plan complies with the city's transportation planning goals. VA BHHCS would also ensure a transfer agreement is developed in accordance with NHPA consultation requirements and that it includes conditions and restrictions to ensure the prospective landowner would maintain the integrity of the National Historic Landmark status of the site, including the road network, which is a contributing resource to the landmark.

5.1.13 Utilities

Construction- and operation-related utilities impacts would be minimized through implementation of the following:

- Consider use of renewable energy generation and energy/water conservation measures in the design of new and renovated facilities.
- Utilize native vegetation and drought-resistant vegetation for area landscaping to reduce irrigation requirements.

5.1.14 Environmental Justice

Implementation of the mitigation measures for all environmental impacts identified in the paragraphs above would also ensure that environmental justice impacts would be negligible. Neither of the communities affected by facility construction or renovation have disproportionately high minority or low income populations.

5.2 Resolution of Adverse Cultural Resources Effects

5.2.1 Guidance

Adverse effects to historic properties can be resolved by measures that VA BHHCS would take to avoid, minimize, or mitigate such effects. Regulations, directives, policies, standards, and guidelines of VA, the Advisory Council on Historic Preservation, and National Park Service (NPS) provide the basis for identifying and developing measures to resolve adverse effects to historic properties, including those presented in the following sections.

5.2.1.1 Standards and Guidelines for Treatment of Historic Properties

The Secretary of the Interior's Standards are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations to historic properties (NPS 1995). The Standards are presented by the four treatment approaches of preservation, rehabilitation, restoration, and reconstruction. The Guidelines offer general design and technical recommendations to assist in applying the standards to a specific property (NPS 1995). Together, the Standards and Guidelines provide a framework for decision-making about changes to a historic property. For the VA BHHCS reconfiguration alternatives, both the Standards and Guidelines would be advisory, not regulatory.

Rehabilitation treatment is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey the property's historical, cultural, or architectural values (NPS 1995). The 10 standards for rehabilitation acknowledge the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character and would be the treatment most applicable to the VA BHHCS reconfiguration alternatives. The rehabilitation treatment standards (NPS 1995) are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

5.2.1.2 Mothballing

The process of closing up (shuttering) a building temporarily to protect it from the weather and secure it from vandalism while planning for future re-use is referred to as mothballing. NPS Preservation Brief 31 provides guidance on protecting historic buildings for up to 10 years, depending on continued monitoring and maintenance (NPS 1993). The Preservation Brief identifies the following nine steps in properly mothballing a building:

- Documentation:
  - Document the architectural and historical significance of the building.
  - Prepare a condition assessment of the building.
- Stabilization:
  - Structurally stabilize the building, based on a professional condition assessment.
  - Exterminate or control pests, including termites and rodents.
  - Protect the exterior from moisture penetration.

- Mothballing:
  - Secure the building and its component features to reduce vandalism or break-ins.
  - Provide adequate ventilation to the interior.
  - Secure or modify utilities and mechanical systems.
  - Develop and implement a maintenance and monitoring plan for protection.

5.2.1.3 Facility Condition Assessment

VA tracks and manages the physical and operational condition of VA facilities through the Facility Condition Assessment process. The Facility Condition Assessment is compiled by a multidisciplinary contractor team of architects and engineers working with VA facility engineering staff and program managers to evaluate most VA buildings on a three-year cycle (VA 2014). Each building system (architectural, structural, mechanical, electrical, and plumbing) is assessed and assigned a grade of A, B, C, D, or F based on condition and remaining useful life of the system components. Any component graded D or F is recorded with an estimated cost for maintenance, repair, or replacement.

5.2.1.4 Managing Underutilized Real Property

VA Directive 7633 and associated Handbook 7633 address methods, policies, and options for managing underutilized real property (buildings and land) (VA 2006a, 2006b). Options for managing underutilized property are considered in the order of priority listed below:

- Offer underutilized property to other VA entities and federal agencies.
- Enhanced-use leasing to a public, private, or non-profit sector for up to 75 years for VA or non-VA use consistent with the mission of VA.
- Sharing, license, outlease, permit, or easement to a public, private, or non-profit sector for VA or non-VA use for three- to five- year timeframes.
- Transfer to non-VA entity, including a federal or state agency, Indian tribe, or public or private entity, depending on the suitability and availability of the property for use by a homeless assistance group.
- Like-kind exchange of property.
- Disposal through the General Services Administration.
- Mothballing, demolition, or deconstruction.

The Building Utilization Review and Repurposing initiative assesses underutilized real property for the potential to develop new housing opportunities for homeless Veterans or Veterans and their families at risk for homelessness (VA 2015). This initiative is part of VA's enhanced-use lease program.

Any transfer or disposal of real property must comply with NEPA and the NHPA. VA may also enter into a partnership or agreement with public or private entities dedicated to historic preservation to facilitate a transfer of properties listed in the National Register of Historic Places (VA 2006b).

5.2.2 Measures to Avoid, Minimize, or Mitigate Adverse Effects

Table 5-1 lists the possible measures that VA BHHCS could take to resolve the potential adverse effects on historic properties from the alternatives to implement the reconfiguration proposal. The measures include input received from the consulting parties. The measures are briefly outlined and are not intended to be all-inclusive for purposes of this Draft EIS. VA BHHCS will continue consultation with the consulting parties and, with input from the public's review of the Draft EIS, will develop further details of the possible measures and present them in the Final EIS, focusing on the preferred reconfiguration alternative and the supplemental alternative, as appropriate. The measures to avoid, minimize, or mitigate adverse effects to historic properties that VA BHHCS will commit to implementing will be documented in the ROD (36 CFR 800.8(c)(4)(i)(A)).

Table 5-1. Possible Measures to Resolve Potential Adverse Effects by Alternative.

Alternative Actions and Effects	Potential Adverse Effects[1,2]	Possible Measures to Resolve Adverse Effects[3]
Alternative A		
On-Campus (Hot Springs): • Continued maintenance of campus facilities. • Temporarily shutter or mothball campus facilities. • Change of use of campus facilities from providing health care services to unoccupied.	2, 4	• Use the Facility Condition Assessment (FCA) process to identify and schedule maintenance needs of unoccupied campus facilities. − Facility staff with historic preservation training will accompany FCA team. • Provide historic preservation training to and/or employ facilities staff/manager with historic preservation qualifications. • Use the Rehabilitation treatment standards (from the Secretary of the Interior's *Standards for the Treatment of Historic Properties*), as necessary, in maintaining unoccupied campus facilities. − Consult with architects/engineers with historic preservation qualifications on maintenance actions. • Follow NPS Preservation Brief 31 *Mothballing Historic Buildings* as necessary to shutter unoccupied campus facilities pending re-use. • Establish procedures to monitor and report on status of resolutions. • Define and implement a future consultation process.
Off-Campus: • Ground disturbance that could potentially encounter and remove archaeological and cultural materials. • Introduction of visual or audible elements into historic setting.	1, 2, 3, 5	• Implement VA Directive 7545 *Cultural Resource Management* and follow VA Handbook 7545 *Cultural Resource Management Procedures* for phased identification and evaluation of historic properties. • Use the Rehabilitation treatment standards (from the Secretary of the Interior's *Standards for the Treatment of Historic Properties*) for renovating any historic building(s) to accommodate health care services at new locations in Hot Springs and Rapid City. − Consult with architects/engineers with historic preservation qualifications on rehabilitation/renovation designs. • Develop a plan for treatment/recovery of archaeological and cultural materials, including a *Native American Graves Protection and Repatriation Act* plan of action. • Determine presence of archaeological and cultural materials. − Determine treatment/recovery measures, as appropriate. − Implement treatment/recovery measures, as appropriate. • Establish procedures to monitor and report on status of resolutions. • Define and implement a future consultation process.

Alternative Actions and Effects	Potential Adverse Effects[1,2]	Possible Measures to Resolve Adverse Effects[3]
Alternative B		
Same as Alternative A.	Same as Alternative A.	Same as Alternative A.
Alternative C		
On-Campus (Hot Springs): • Exterior and interior renovations to Building 12 and domiciliary. • Continued maintenance of campus facilities. • Temporarily shutter or mothball certain campus facilities.	2, 4	• Facility staff with historic preservation training will accompany FCA team. • Provide historic preservation training to and/or employ facilities staff/manager with historic preservation qualifications. • Use the Rehabilitation treatment standards (from the Secretary of the Interior's *Standards for the Treatment of Historic Properties*) for exterior and interior renovations and for maintaining campus facilities. − Consult with architects/engineers with historic preservation qualifications on renovation designs and maintenance actions. • Develop a historic preservation plan. • Follow NPS Preservation Brief 31 *Mothballing Historic Buildings* as necessary to shutter facilities pending re-use. • Establish procedures to monitor and report on status of resolutions. • Define and implement a future consultation process.
Off-Campus: Same as Alternative A.	Same as Alternative A.	Same as Alternative A.
Alternative D		
Same as Alternative A.	Same as Alternative A.	Same as Alternative A.

Alternative Actions and Effects	Potential Adverse Effects[1,2]	Possible Measures to Resolve Adverse Effects[3]
Alternative E		
On-Campus (Hot Springs): • Exterior and interior renovations to campus facilities. • New construction of buildings. • Continued maintenance of campus facilities. • Introduction of visual or audible elements into historic setting. • Ground disturbance that could potentially encounter and remove archaeological and cultural materials.	1, 2, 3, 4, 5	• Facility staff with historic preservation training will accompany FCA team. • Provide historic preservation training to and/or employ facilities staff/manager with historic preservation qualifications. • Use the Rehabilitation treatment standards (from the Secretary of the Interior's *Standards for the Treatment of Historic Properties*) for exterior and interior renovations and for maintaining campus facilities. − Consult with architects/engineers with historic preservation qualifications on renovation designs, new construction designs, and maintenance actions. • Develop a historic preservation plan. • Develop a plan for treatment/recovery of archaeological and cultural materials, including a *Native American Graves Protection and Repatriation Act* plan of action. • Determine presence of archaeological and cultural materials. − Determine treatment/recovery measures, as appropriate. − Implement treatment/recovery measures, as appropriate. • Establish procedures to monitor and report on status of resolutions. • Define and implement a future consultation process.
Off-Campus: No effects.	None.	None required.
Alternative F		
On-Campus (Hot Springs): • Continued maintenance of campus facilities. • Upgrade and renovate campus facilities to maintain clinical standards.	2	• Facility staff with historic preservation training will accompany FCA team. • Provide historic preservation training to and/or employ facilities staff/manager with historic preservation qualifications. • Use the Rehabilitation treatment standards (from the Secretary of the Interior's *Standards for the Treatment of Historic Properties*) for renovations and maintenance of campus facilities. − Consult with architects/engineers with historic preservation qualifications on renovation designs and maintenance actions. • Develop a historic preservation plan. • Consult with SHPO and NPS, as appropriate.
Off-Campus: No effects.	None.	None required.

Alternative Actions and Effects	Potential Adverse Effects[1,2]	Possible Measures to Resolve Adverse Effects[3]
Supplemental Alternative G		
On-Campus (Hot Springs): • Exterior and interior renovations to campus facilities. • New construction of buildings. • Continued maintenance of campus facilities. • Introduction of visual or audible elements into historic setting. • Ground disturbance that could potentially encounter and remove archaeological and cultural materials. • Change of use of campus facilities from providing health care services to a different use.	1, 2, 3, 4, 5, 7	• Implement VA Directive 7633 *Managing Underutilized Real Property, Including Disposal* and follow VA Handbook 7633 *Managing Underutilized Real Property, Including Disposal* and Building Utilization Review and Repurposing initiatives for re-use decisions and compliance with NHPA. • Develop a historic preservation plan • Develop a plan for treatment/recovery of archaeological and cultural materials, including a *Native American Graves Protection and Repatriation Act* plan of action. • Use the Rehabilitation treatment standards (from the Secretary of the Interior's *Standards for the Treatment of Historic Properties*) for exterior and interior renovations, maintenance of campus facilities, and for new construction. − Consult with architects/engineers with historic preservation qualifications on renovation designs, new construction designs, and maintenance actions. • Execute a legally enforceable document with new occupant/owner to implement the historic preservation plan or follow *Standards for the Treatment of Historic Properties*. • Establish procedures to monitor and report on status of resolutions. • Define and implement a future consultation process.

[1] 36 CFR 800.5.(a): Examples of adverse effects on historic properties include, but are not limited to:

1. Physical destruction of or damage to all or part of a historic property.
2. Alteration of a historic property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines.
3. Removal of a historic property from its historic location.
4. Change in character of the property's use or of physical features within the property's setting that contributes to its historic significance.
5. Introduction of visual, atmospheric, or audible elements that diminish the integrity of a historic property's significant historic features.
6. Neglect of a historic property which causes its deterioration, except where such neglect and deterioration are recognized qualities of religious and cultural significance to a Native American tribe.
7. Transfer, lease, or sale of a historic property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

[2] Identification of possible adverse effects not covered by these examples from the regulation would be indicated by a text notation in the second column of this table, as Section 106 consultation continues.

[3] Possible resolutions are not listed in any order of importance or priority.

6.0 AGENCY COORDINATION AND PUBLIC INVOLVEMENT

The goals of public involvement and agency coordination are to provide thorough information in a convenient and timely manner to allow meaningful input to the integrated *National Environmental Policy Act* (NEPA)/*National Historic Preservation Act* (NHPA) process, and help facilitate decisions to be made by the U.S. Department of Veterans Affairs (VA) Black Hills Health Care System (BHHCS). The public and agencies are commonly referred to as "stakeholders". Stakeholders include those who may be affected by or have an interest in VA's proposal and the NEPA/NHPA process, including individuals, interest groups, community organizations, elected officials, tribal governments, and federal, state, or local government agencies. Stakeholders also include consulting parties as defined by the consultation regulations of Section 106 of the NHPA.

Federal regulations, policies, and guidelines provide the framework within which VA remains accountable for timely and effective stakeholder involvement in decisions which may interest or affect them. This chapter provides an overview of the framework to involve stakeholders during the integrated NEPA/NHPA process.

6.1 Public Involvement Process

The public involvement process begins with scoping and continues throughout the preparation of the environmental impact statement (EIS) until VA signs the record of decision. This section describes the milestones and timeframes when stakeholders are involved during the NEPA process.

6.1.1 Scoping

"Scoping" is the term used in the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [CFR] 1501.7) to define the process for determining the scope of issues to address during the environmental analysis of an agency's proposed action. Scoping also helps identify issues that are neither significant nor relevant to a proposal, or alternatives that are not feasible, thereby eliminating these issues or alternatives from detailed analysis.

6.1.1.1 Notice of Intent

The Notice of Intent (NOI) is the U.S. government's means of notifying the public and interested parties of an agency's intention to prepare an EIS for its proposed action. VA published NOIs 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; and on June 13, 2014, announcing the extension of the public scoping comment period.

6.1.1.2 Scoping Notice and News Release

Scoping notices announcing the reconfiguration proposal, schedules for public scoping meetings, and an extension to the comment period were published in 15 newspapers covering communities in the VA BHHCS catchment area in South Dakota, Nebraska, and Wyoming. The two scoping notices were paid publications in the public notice or legal section of the newspapers. VA BHHCS also prepared news releases announcing the NOI, schedules and locations for public scoping meetings, and the extension to the public comment period along with additional public scoping

meetings. The three news releases were circulated to more than 50 media outlets, and were posted on the VA BHHCS reconfiguration proposal webpage (www.blackhills.va.gov/vablackhillsfuture).

6.1.1.3 Scoping Meetings

VA BHHCS hosted 10 scoping meetings in 9 different communities throughout the service area between June 11 and 27, 2014. The scoping meetings offered stakeholders an opportunity to learn about and provide comments on the reconfiguration proposal. Attendance at the meetings ranged from 3 to 115 people. The meeting format consisted of an open house followed by a presentation that explained the purpose of and need for the reconfiguration proposal, alternatives for implementing the reconfiguration, the integration of the NHPA process with the EIS, and the public's role in contributing to the NEPA process. Upon completion of the presentation, the attendees were invited to provide verbal comments.

6.1.1.4 Scoping Summary

The public scoping period was open for 90 days from May 16 through August 16, 2014. The scoping process provided sufficient opportunity for stakeholders to express their comments and provide meaningful input to the integrated NEPA/NHPA process. There were 386 written comments received, 159 verbal comments made during the scoping meetings, and a form letter submitted by 138 individuals. The comments focused generally on the purpose, need, and alternatives for the reconfiguration; potential effects to local social and economic conditions, community services, and utilities; the National Historic Landmark (NHL) status of the VA Hot Springs campus and potential adverse effects to historic properties; integration of NHPA consultation with the NEPA process; and implementation of the NEPA process. A summary of the public scoping process and the comments received is included in Appendix D, and can also be viewed at the VA BHHCS webpage (www.blackhills.va.gov/vablackhillsfuture).

6.1.2 EIS Status Open House

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 status of preparing the EIS. Stakeholders were provided with additional information on the purpose of and need for the reconfiguration, a summary of public scoping comments, and a map of the proposed area in which to identify and assess effects to historic properties. The potential health care services were outlined on a chart to explain the basis for the facility types and changes proposed under each alternative and location. VA BHHCS and EIS contractor staff informally discussed the information with attendees; no public testimony or comments were invited or recorded. The information presented at the open houses can be viewed at the VA BHHCS reconfiguration webpage (www.blackhills.va.gov/vablackhillsfuture).

6.1.3 Draft EIS Comment Period

VA published a Notice of Availability (NOA) of the Draft EIS in the Federal Register, inviting public comments on the content of the document. VA BHHCS offers a 60-day comment period that officially started when the NOA for the Draft EIS was published by the Environmental Protection Agency in the Federal Register. The NOA was published in local newspapers, posted online (along with other project updates and information) on the VA BHHCS reconfiguration webpage (www.blackhills.va.gov/vablackhillsfuture), and provided to the media outlets covering the

service area. More than 500 stakeholders who had previously signed on to the project mailing list were mailed a postcard with the NOA of the Draft EIS.

VA BHHCS will host public comment meetings in six communities within the service area during the 60-day comment period. The meetings will provide stakeholders an opportunity to comment on the potential environmental, social, and economic impacts as described in the Draft EIS. The meeting format will consist of a presentation to explain the purpose of and need for the reconfiguration proposal, describe the alternatives, and summarize the analysis and potential impacts associated with each alternative. The presentation and verbal comments at each meeting will be transcribed by a professional court reporter. Responses to comments received during the comment period will be addressed in the Final EIS.

6.2 NEPA/NHPA Substitution and Consultation

The reconfiguration proposal is a federal undertaking subject to Section 106 of the NHPA and Advisory Council on Historic Preservation (ACHP) regulations implementing Section 106 (36 CFR 800). VA has chosen to integrate Section 106 compliance within the overall NEPA framework, following the substitution process of 36 CFR 800.8(c).

VA BHHCS used *NEPA and NHPA, A Handbook for Integrating NEPA and Section 106* as guidance in preparing this EIS. Developed jointly by ACHP and CEQ, the handbook includes a checklist for preparing environmental documents to comply with the Section 106 substitution process. This checklist is included in Appendix C, NEPA/NHPA Substitution Process.

6.2.1 Notification

VA's Federal Preservation Officer initiated informal conversation in September 2012 with the ACHP, National Park Service, South Dakota State Historic Preservation Office (SHPO), and other stakeholders of the possibility of substituting the NEPA process for Section 106 compliance for the reconfiguration proposal being considered at that time. By letter dated May 13, 2014, VA BHHCS formally notified ACHP, the National Park Service, SHPO, and numerous other stakeholders of its intent to integrate the NHPA Section 106 evaluation and consultation procedures into the NEPA environmental impact analysis following the substitution process. This letter and the list of recipients are included in Appendix C, NEPA/NHPA Substitution Process.

6.2.2 Identification of Consulting Parties

Consulting parties, as defined under 36 CFR 800.2(c), include: (1) SHPO; (2) Indian tribes; (3) representatives of local governments; (4) applicants for federal assistance, permits, licenses and other approvals; and (5) additional consulting parties. An additional consulting party is defined as "certain individuals and organizations with a demonstrated interest in the undertaking [who] may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties". Because the reconfiguration proposal involves an NHL, the Secretary of the Interior, represented by the National Park Service, is included as a consulting party pursuant to Section 110(f) of the NHPA and 36 CFR 800.10, which address special requirements for protecting an NHL.

VA BHHCS identified potential consulting parties from stakeholders who were notified by letter dated May 13, 2014, of the intent to prepare an EIS that integrates the Section 106 compliance requirements of the NHPA within the framework of the NEPA process. Attendees at the public scoping meetings were invited to submit written requests to VA BHHCS to be considered as a consulting party. Agencies and organizations that submitted written requests to be consulting parties during the scoping period were accepted. VA BHHCS conducted additional outreach to Native American tribes to participate as consulting parties (see Section 6.3). By letter dated October 9, 2014, VA BHHCS notified stakeholders of the preliminary list of consulting parties identified from the scoping process. VA BHHCS again notified four Veterans service organizations by letter dated January 15, 2015, of participation in the process as a consulting party, and accepted those organizations that responded in writing.

Table 6-1 lists the 17 NHPA Section 106 consulting parties identified as of the publication of the Draft EIS. Additional consulting parties may be identified as the integrated NEPA and Section 106 process continues. Correspondence pertaining to consulting party identification and consulting party representatives is included in Appendix C, NEPA/NHPA Substitution Process.

Table 6-1. NHPA Section 106 Consulting Parties

Advisory Council for Historic Preservation
American Federation of Government Employees, Hot Springs Local
Assiniboine and Sioux Tribes of the Fort Peck Reservation
City of Hot Springs
Department of the Interior, National Park Service
Fall River County Commissioners Office
Fall River County Historical Society
Hot Springs Certified Local Government–Historic Preservation Commission
Individual Veteran
Kiowa Tribe of Oklahoma
National Trust for Historic Preservation
Northern Arapaho Tribe
Oglala Sioux Tribe of the Pine Ridge Reservation
Save the VA Organization
South Dakota American Legion
South Dakota State Historic Preservation Office
Yankton Sioux Tribe

6.2.3 Consultation on Effects to Historic Properties

VA hosted an initial Section 106 consultation meeting on May 31, 2012, to receive input from stakeholders regarding potential effects to historic properties, primarily the VA Hot Springs campus, which encompasses the Battle Mountain Sanitarium NHL. With the Federal Register publication of the NOI on May 16, 2014, VA BHHCS re-initiated the consultation process to identify and address effects to historic properties with the start of the integrated NEPA/NHPA process.

VA BHHCS hosted workshops and a teleconference with consulting parties between November 2014 and April 2015 to consult on:

- Geographic area of potential effects of the reconfiguration alternatives in Hot Springs and Rapid City
- Identification of historic properties within the geographic area of potential effects
- Types of actions that potentially affect historic properties
- Criteria and examples of adverse effects
- Approach to identifying and assessing potential adverse effects to historic properties
- Possible measures to avoid, minimize, or mitigate adverse effects

The summaries of the consultation and discussions from the workshops and teleconference are included in Appendix C, NEPA/NHPA Substitution Process.

6.3 Native American Consultation

VA consults with federally recognized tribal governments in accordance with NHPA Section 106 on issues relating to historic properties, including those of traditional religious and cultural importance. VA also consults with tribal governments on a much broader range of potential tribal concerns and issues with respect to proposed VA actions, as prescribed by Executive Order 13175, Consultation and Coordination with Indian Tribal Governments and by VA Directive 8603, Consultation and Communication with Federally-Recognized Indian Tribes.

VA sought government-to-government consultation with Native American tribes that have potential traditional, historic, or current ties to the VA BHHCS service area. A list of potentially affected tribes (federally recognized and other tribes) was compiled from VA sources and from SHPOs for South Dakota, Nebraska, and Wyoming; the U.S. Department of Housing and Urban Development website; tribal historic preservation office directories; tribal government websites; federal agency websites related to tribal consultation; historic maps of tribal territories; and from the EIS contractor's previous experience. The VA Office of Public and Intergovernmental Affairs, by letter sent in August 2014, informed these tribal governments of the reconfiguration proposal, invited their participation in the Section 106 consultation process pertaining to historic properties, and requested their input on other issues such as access to medical care and Veterans benefits. The letter was sent to 68 representatives of 41 tribes. The letter and list of tribes to whom it was sent are included in Appendix C, NEPA/NHPA Substitution Process.

Follow-up contacts were made with the 41 tribes after the August 2014 letter was sent to gauge interest in the reconfiguration proposal and participation in the consultation process on historic properties. The follow-up contacts included phone calls to both tribal leadership (chairpersons, presidents, and governors) and tribal historic preservation officers (as applicable). Contact was attempted until the person was reached or a message could be left with an administrative assistant or on voicemail. Additional outreach was conducted to the tribes residing within the VA BHHCS service area and within the State of South Dakota. As a result of the additional outreach, five tribes are participating as consulting parties (refer to Table 6-1).

The Office of Public and Intergovernmental Affairs, along with the Office of Tribal Government Relations and VA BHHCS, hosted a government-to-government consultation meeting on the reconfiguration proposal on the Pine Ridge Reservation in South Dakota in November 2014. This meeting was part of VA's ongoing responsibilities to consult and coordinate with tribal governments per Executive Order 13175 and VA Directive 8603. Issues pertaining to historic properties or the EIS were not raised or discussed during this meeting, for which a transcript is available.

6.4 Agency Coordination

Coordination with federal, state, or local agencies is required by certain laws such as the NHPA, *Endangered Species Act*, or *Clean Water Act*; by executive orders addressing interagency and intergovernmental coordination; and by CEQ regulations implementing NEPA that emphasize cooperative consultation among agencies. Agencies with jurisdiction by law or with special expertise with respect to any environmental issue are requested to cooperate in the NEPA process (40 CFR 1501.6). VA BHHCS has requested such agencies, including ACHP, the National Park Service, and SHPO, to cooperate as NHPA Section 106 consulting parties for their expertise in historic properties and cultural issues, along with the other agencies and organizations listed in Table 6-1. No other environmental issues are anticipated that would require the special expertise or jurisdiction of other agencies to cooperate in the preparation of the EIS, or provide additional coordination required by law.

Certain federal, state, and local agencies were contacted by VA BHHCS and the EIS contractor for data to use in describing baseline environmental, social, and economic conditions, and for use in assessing impacts to those conditions. Further input or comments from these agencies will be addressed in the Final EIS.

Copies of the Draft EIS were sent to the following federal, state, and local agencies and officials, in addition to those that are also listed as consulting parties in Table 6-1:

Ellsworth Air Force Base
U.S. Environmental Protection Agency, Region 8
U.S. Fish and Wildlife Service
U.S. Representative Kristi Noem (SD)
U.S. Senator John Thune (SD)
U.S. Senator Mike Rounds (SD)

Nebraska Department of Veterans Affairs
South Dakota Department of Environment and Natural Resources
South Dakota Department of Veterans Affairs
South Dakota Division of Wildlife
Wyoming Veterans Commission

Fall River Board of County Commissioners

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9.0 GLOSSARY

Aesthetic resources: The components of the environment as perceived through the visual sense only. Aesthetic specifically refers to beauty in both form and appearance.

Affected environment: A portion of the NEPA document that succinctly describes the environment of the area(s) to be affected or created by the alternatives under consideration. Includes the environmental and regulatory setting of the proposed action.

Alternative: A reasonable way to fix the identified problem or satisfy the stated need.

Attainment area: An area that the Environmental Protection Agency has designated as being in compliance with one or more of the National Ambient Air Quality Standards for sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and particulate matter. An area may be in attainment for some pollutants but not for others.

Council on Environmental Quality (CEQ): Established by Congress within the Executive Office of the President as part of the *National Environmental Policy Act of 1969*, CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives. The Council's Chair, who is appointed by the President with the advice and consent of the Senate, serves as the principal environmental policy adviser to the President. The CEQ reports annually to the President on the state of the environment, oversees federal agency implementation of the environmental impact assessment process, and acts as a referee when agencies disagree over the adequacy of such assessments.

Criteria pollutant: An air pollutant that is regulated by National Ambient Air Quality Standards. Criteria pollutants include sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and two size classes of particulate matter, PM_{10} and $PM_{2.5}$ New pollutants may be added to, or removed from, the list of criteria pollutants as more information becomes available.

Critical habitat: Habitat essential to the conservation of an endangered or threatened species that has been designated as critical by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service following the procedures outlined in the *Endangered Species Act* and its implementing regulations.

Cumulative effect (cumulative impact): The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Decibel (dB): A unit for expressing the relative intensity of sounds on a logarithmic scale from zero for the average least perceptible sound to about 130 for the average level at which sound causes pain to humans. For traffic and industrial noise measurements, the A-weighted decibel (dBA), a frequency-weighted noise unit, is widely used. The A-

weighted decibel scale corresponds approximately to the frequency response of the human ear and thus correlates well with the loudness perceived by people.

Direct effects: Caused by the action and occur at the same time and place.

Ecoregion: Geographical area with similar climate and landforms, containing a variety of ecosystems characterized by its plant and animal communities and abiotic conditions, such as climate, soils, and elevation.

Effects: "Effects" and "impacts" as used in this analysis are synonymous. Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.

Endangered species: Plants or animals that are in danger of extinction through all or a significant portion of their ranges and that have been listed as endangered by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service following the procedures outlined in the *Endangered Species Act* and its implementing regulations.

Environmental impact statement (EIS): A detailed written statement required by Section 102(2)(C) of NEPA, analyzing the environmental impacts of a proposed action, adverse effects of the project that cannot be avoided, alternative courses of action, short-term uses of the environment versus the maintenance and enhancement of long-term productivity, and any irreversible and irretrievable commitment of resources.

Environmental justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Executive Order 12898 directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing disproportionately high and adverse effects of agency programs, policies, and activities on minority and low-income populations.

Floodplain: The lowland and relatively flat areas adjoining inland and coastal waters including flood-prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year.

Hazardous material: Any material that poses a threat to human health and/or the environment. Hazardous materials are typically toxic, corrosive, ignitable, explosive, or chemically reactive.

Historic property: Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the

Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

Impacts: See Effects.

Impervious surface: A hard surface area that either prevents or retards the entry of water into the soil or causes water to run off the surface in greater quantities or at an increased rate of flow. Common impervious surfaces include, but are not limited to, rooftops, walkways, patios, driveways, parking lots, storage areas, concrete or asphalt paving, and gravel roads.

Indirect effects: Caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. May include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Mitigation: Includes (a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and (e) compensating for the impact by replacing or providing substitute resources or environments.

National Ambient Air Quality Standards (NAAQS): Standards defining the highest allowable levels of certain pollutants in the ambient air (i.e., the outdoor air to which the public has access). Primary standards are established to protect public health; secondary standards are established to protect public welfare (for example, visibility, crops, animals, buildings).

National Pollutant Discharge Elimination System (NPDES): A provision of the *Clean Water Act* that prohibits discharge of pollutants into waters of the United States unless a special permit is issued by the Environmental Protection Agency, a state, or, where delegated, a tribal government on an Indian reservation.

National Register of Historic Places: The nation's inventory of known historic properties that have been formally listed by the National Park Service (NPS). The National Register of Historic Places is administered by the NPS on the behalf of the Secretary of the Interior. National Register listings include districts, landscapes, sites, buildings, structures, and objects that meet the set of criteria found in 36 CFR 60.4.

No action alternative: The alternative where current conditions and trends are projected into the future without another proposed action.

Non-attainment area: An area that the Environmental Protection Agency has designated as not meeting (that is, not being in attainment of) one or more of the National Ambient Air

Quality Standards for sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and particulate matter. An area may be in attainment for some pollutants, but not for others.

Particulate matter (PM), PM_{10}, $PM_{2.5}$: Any finely divided solid or liquid material, other than uncombined (that is, pure) water. A subscript denotes the upper limit of the diameter of particles included. Thus, PM_{10} includes only those particles equal to or less than 10 micrometers (0.0004 inch) in diameter; $PM_{2.5}$ includes only those particles equal to or less than 2.5 micrometers (0.0001 inch) in diameter.

Primary care: The Institute of Medicine's definition of primary care provides the foundation of VHA primary care. "Primary care is the provision of integrated, accessible health care services by clinicians who are accountable for addressing a large majority of personal health care needs, developing a sustained partnership with patients, and practicing in the context of family and community." VHA primary care gives eligible Veterans easy access to health care professionals familiar with their needs. It provides long-term patient-provider relationships, coordinates care across a spectrum of health services, educates, and offers disease prevention programs. Primary care has become the first point of contact with the health care system for Veterans enrolled in VHA. (Source: http://www.va.gov/health/services/primarycare/)

Runoff: The portion of rainfall, melted snow, or irrigation water that flows across ground surface and is eventually returned to streams. Runoff can pick up pollutants from the air or the land and carry them to streams, lakes, and oceans.

Scoping: An early and open process for determining the extent and variety of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR §1501.7). The scoping process helps not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the NEPA process accordingly, and for early identification of what are and what are not the real issues (40CFR §1500.5(d)). The scoping process identifies relevant issues related to a proposed action through the involvement of all potentially interested or affected parties (affected federal, state, and local agencies; recognized Indian tribes; interest groups, and other interested persons) in the environmental analysis and documentation.

Secondary care: Provided by someone with specific expertise in a condition, generally by reference from primary care physician.

Solid waste: Non-liquid, non-soluble materials ranging from municipal garbage to industrial wastes that contain complex and sometimes hazardous substances. Solid wastes also include sewage sludge, agricultural refuse, demolition wastes, and mining residues. Technically, solid waste also refers to liquids and gases in containers.

Specialty care: VHA specialty care components include: allergy and immunology, anesthesia, cardiology, chaplain Services, critical care, dermatology, diabetes and endocrinology, emergency medicine, eye care (optometry and ophthalmology), gastroenterology, infectious diseases, nephrology (kidneys), neurology, nutrition and food services,

oncology and hematology, pain management, podiatry, and rheumatology. Source: http://www.medicalsurgical.va.gov/medicalsurgical/index.asp

Tertiary care: A higher level of specialty care within a hospital, including highly specialized equipment and surgery.

Unique Veteran: A "unique Veteran" is counted as unique in each division from which they receive care. For example, if a patient receives primary care at one VA facility and specialty care from another VA facility, they will be counted as a unique patient in each.

Wetlands: Those areas that are inundated by surface water or groundwater with a frequency sufficient to support, and under normal circumstances do, or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas. Jurisdictional wetlands are those wetlands protected by the *Clean Water Act*. They must have a minimum of one positive wetland indicator from each parameter (vegetation, soil, and hydrology). The U.S. Army Corps of Engineers requires a permit to fill or dredge jurisdictional wetlands.

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Appendix A
Permits

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Appendix A: Permits

This appendix lists environmental permits or other agreements that may need to be obtained by the U.S. Department of Veterans Affairs to implement the actions included in the alternatives in this environmental impact statement. Key federal, state, and local requirements are identified for both construction and operation. When specific location and construction (if any) decisions are made, the South Dakota "DENR ONE STOP Permitting" website, at https://denr.sd.gov/onestop.aspx, provides a detailed and useful guide to the state-level environmental permitting and regulatory requirements for projects within the state.

Agency	Permit / Requirement	Need / Basis	Status
Air Quality			
South Dakota Department of Environment and Natural Resources (SDDENR)	Title V (Part 70) Operating Permit	For operation of steam generation boilers, furnaces, emergency generators, and storage tanks with the potential to emit pollutants in excess of regulatory limits. Required pursuant to Chapter 34A-1-21 of the South Dakota Codified Laws and the Air Pollution Control Regulations of the State of South Dakota.	Existing Permit Number 28.0102-27 for Hot Springs VA Medical Center (VAMC). Modifications to existing permit may be required if existing facility is changed. New permit may be required based on potential emissions.
SDDENR	Minor Operating Permit(s)	For operation of sources not covered by a Part 70 Permit with the potential to emit uncontrolled emissions of regulated air pollutants below regulatory limits. Required pursuant to Chapter 34A-1-21 of the South Dakota Codified Laws and the Air Pollution Control Regulations of the State of South Dakota.	New permit(s) may be required based on potential emissions.

Agency	Permit / Requirement	Need / Basis	Status
Pennington County / Rapid City Air Quality Division	Air Quality Construction Permit	Required for a construction activity disturbing one or more acres of land area which may cause fugitive emissions to be released into the ambient air. Required by Pennington County Ordinance 12, Fugitive Emissions and the Abatement of Smoke, Section 110, Air Quality Construction Permit Requirements Rapid City Ordinance 8.34.100, Construction Permit Requirements.	Specific to new construction, if any.
Cultural Resources			
Advisory Council on Historic Preservation, South Dakota Historic Preservation Office, tribal representatives, other consulting parties	Consultation	Consultation under *National Historic Preservation Act* Section 106 to evaluate potential effects of federal undertaking on historic resources listed or eligible for listing on the National Register of Historic Places.	Ongoing.
Geology and Soils			
Natural Resource Conservation Service (U.S. Department of Agriculture)	Farmland Conversion Impact Rating (Form AD-1006)	Evaluation of prime, unique, statewide, or local important farmland that may be impacted, in accordance with the *Farmland Protection Policy Act*.	Specific to new construction sites, if any.
Hydrology and Water Quality			
SDDENR	National Pollutant Discharge Elimination System/Surface Water Discharge permit	Compliance with South Dakota *Water Pollution Control Act* and Administrative Rules of South Dakota (ARSD) 74:52:01 through 74:52:11.	Maintain and revise, as needed, existing Hot Springs VAMC Permit SDG860037.

Agency	Permit / Requirement	Need / Basis	Status
SDDENR	Notice of Intent to Obtain Coverage Under the SWD General Permit for Storm Water Discharges Associated with Construction Activities	Required for disturbance of one or more acres of land area; must prepare stormwater pollution prevention plan.	Specific to new construction, if any.
Rapid City	Erosion and sediment control permit	Required for any earth disturbing activities, except as specifically excluded – no lower limits on disturbed areas. Required by Rapid City Code of Ordinances Section 8.46.020.	Specific to new construction, if any.
Wildlife and Habitat			
U.S. Fish and Wildlife Service	Consultation	Required if listed species may be affected by a project, per Section 7 of the *Endangered Species Act*	Requirement to be determined after selection of sites for new facilities, if any.
Floodplains and Wetlands			
U.S. Army Corps of Engineers and SDDENR	Consultation and permitting	Permits under Sections 401 and 404 of the *Clean Water Act* may be required before construction activities commence if wetlands are present.	Specific to new construction, if any.
SDDENR	Water Quality Certification for 404 dredge and fill permit	SDDENR must issue a water quality certification before the federal 404 dredge and fill permit is issued.	Specific to new construction, if any.
Pennington County	Floodplain Development Permit	Required prior to construction or development within any area of special flood hazard, by Pennington County Flood Damage Prevention Ordinance.	Site-specific requirement. Specific to new construction, if any.
Fall River County	Floodplain Development Permit	Required prior to construction or development within any area of special flood hazard by Fall River County Ordinance 2007-1A, Building within the Flood Plain.	Site-specific requirement. Specific to new construction, if any.

Agency	Permit / Requirement	Need / Basis	Status
Rapid City	Floodplain Development Permit	Required prior to construction within areas of special flood hazard per Rapid City Code of Ordinances Section 15.32.060 and 15.32.280.	Site-specific requirement. Specific to new construction, if any.
Rapid City	Flood Hazard District Conditional Use Permit	Authorization is required for specified uses in the flood hazard district per Rapid City Code of Ordinances Section 17.28.	Site-specific requirement. Specific to new construction, if any.
Solid Waste and Hazardous Materials			
SDDENR	Asbestos Demolition/ Renovation Notification Form	South Dakota Codified Law 34-44; Administrative Rules of South Dakota 74:36:08, and 40 Code of Federal Regulations (CFR) Part 61.	Specific to renovations of existing facilities, if any.
SDDENR	RCRA Permit / Hazardous Waste Generation Notification Form	*Hazardous Waste Management Act* in South Dakota Codified Law 34A-11 and hazardous waste rules in ARSD 74:28 (which adopts regulations in 40 CFR Parts 260-279.) Permit depends upon hazardous waste generation quantities.	Maintain or modify Hot Springs VAMC permit RCRA CESQG ID SD1360080061. Maintain or modify Fort Meade VAMC permit RCRA SQG ID SD9360090063.
SDDENR	Notification for Aboveground Stationary Storage Tanks Regulated Storage Tank Removal Notification Form	Comply with storage tank statutes South Dakota Codified Laws 34A-2-98, 99, 100, and 101; and ARSD 74:56:01, 02, and 03.	Required for installation of new tanks and changes or closure of existing tanks.

Appendix B
Save the VA Proposal

Note: The "CONFIDENTIAL" watermark that appears on the title page of this proposal also appears on the same proposal as it is publicly posted online by the Save the VA community organization.

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Building an Integrated Veterans Support Community

A Proposal for a National Veterans Administration Demonstration Project

5/25/2012

CONFIDENTIAL

A proposal developed by the Hot Springs "Save the VA Committee" in cooperation with the community of Hot Springs and volunteers representing community, county, and tribal organizations

A. Introduction

The Announcement

On December 12th, 2011 the community of Hot Springs faced a life changing situation. That night administrators from the Black Hills VA Health Care System announced to a "standing room only" crowd that a new vision for VA services in the Black Hills meant a significant reduction in services provided by the Hot Springs VA facility. Many jobs would either be lost or transferred from the community. The domiciliary, which had housed veterans for nearly 100 years, would most likely be moved 50 miles away; and most of the historic VA facility would most likely be abandoned.

The reaction among community residents, many of whom are veterans served by the Hot Springs facility, was immediate and intense. Shock, outrage, and anger filtered through the theater where the meeting was held. Questions about the accuracy of the data were asked and, to most attendees, inadequately answered. A community with a 100 year legacy of veterans care was told that legacy meant little if it stood in the way of the VA vision of progress.

To be fair, the announcement was not a complete surprise. Services at the Hot Springs facility had been systematically reduced for nearly 20 years. Facilities that once housed and cared for several hundred veterans in the domiciliary had been reduced to 100. Many medical services had been relocated to Ft. Meade, and many professional staff were on temporary rather than permanent contracts. Rumors had persisted for some time that the facility would most likely be closed in the near future.

Although the signs of eventual closure, in retrospect, were evident, the community continued to believe that the community wide investment in caring for veterans of our nation's wars ultimately was more important than the VA's concept of consolidation and efficiency. A national reputation for superior PTSD and substance abuse treatment surely meant something. They learned that evening that it meant little.

The Reaction

Within a matter of days the community, veterans and non-veterans alike, began to organize. The most obvious place to start was to counter what the community believed were both inaccurate assumptions and data about the services provided by the Hot Springs facility. Toward that end, a community open meeting was held and a recommendation made for a series of work groups to be formed to gather information about all aspects of the impact of the Hot Springs facility. This information was to include medical services, the current and future

needs of veterans, the historic facility, the impact a closure would have on the community and much more.

Each work group was tasked with developing a white paper outlining their research and recommendations coming from that research. The intent was for the white papers to form the background information for a community-based proposal to counter what had been presented by the Black Hills VA Health Care System administrators. The "Save the VA" campaign had begun.

Several hundred people volunteered for tasks ranging from serving on the work group committees, making signs, fundraising, publicity, and much more. Community forums were held, and parades were organized. The community responded to this challenge in a way deeper and more profound than any previous challenge in its history.

As the work groups progressed it became apparent that the effort was bigger than saving one community. It was ultimately about conflicting visions of care for our nation's veterans. It was also about the importance of providing care for rural veterans. Veterans care facilities were first placed in rural locations such as Hot Springs because of the quiet and caring environment. More and more the country is seeing veterans care relocated and consolidated in urban centers. The campaign questioned whether urban settings were appropriate for many veterans suffering from PTSD and substance abuse problems. The campaign learned from many rural veterans how important the Hot Springs facility has been to their care. Finally, the campaign further questioned the overall economic impact such consolidation had for rural communities with long traditions of serving veterans. Hot Springs certainly was not the first rural community to be threatened, and all indications were it wouldn't be the last.

The Proposal

Therefore the vision of the campaign grew. It grew beyond only Hot Springs and the veterans within the catchment area. Although both the community and service for regional veterans remains at the core of the campaign, the mission grew to encompass a larger purpose. And that purpose was to address several questions:

- Can services be provided in a rural location like Hot Springs using strategies that can result in cost savings for the system?
- Can a partnership be created between the VA system and a community like Hot Springs that can impact both the quality of veterans care as well as having a positive impact on community revitalization?
- Could Hot Springs serve as a demonstration model for veterans services provided in rural settings across the country?

So, the concept grew from a local concern, to a national concern. The concept of a counter proposal grew from addressing only the local issues but also national issues. The focus grew from simply a counter proposal to a national demonstration project that would address these and many more questions with the results helping to serve as a blueprint for rural veteran's health care for years into the future.

Community members, professional and service organizations, regional governments, and tribal councils have all come together to voice their vision represented by this proposal for a demonstration project. The following pages provide a detailed overview of the project and its potential for national impact. Much of the original intent of the work groups remain. The white papers developed by the work groups are appended to the proposal. Also appended is a collection of veteran's stories. Veterans from the Second World War through the current conflicts in the mid-East volunteered their stories of service, emotional and physical scars, and healing. Included in their stories is the role that veteran's care facilities like Hot Springs have played in that healing.

B. Project Vision

The Hot Springs Domiciliary and its related medical services has become a nationally recognized treatment center for PTSD and related substance abuse problems. The Hot Springs VA has served not only veterans in the region, but also has become a preferred treatment center for many other veterans across the country. Unfortunately, over the past several years many of the services historically provided at Hot Springs have been downsized. For example, the capacity of the domiciliary has been reduced from over 200 beds to 100. Other medical services have been reduced or transferred to other locations in the region. Despite this, the reputation of the Hot Springs VA has remained strong as exemplified by a continued waiting list to receive services at this rural location.

At the same time, projections about the numbers of veterans affected by PTSD and PTSD related illnesses continue to rise significantly. According to information provided by the National Veterans Training Institute (www.nvti.ucdenver.edu):

"***A recent study conducted by Stanford University titled A Dynamic Model for Posttraumatic Stress Disorder among U.S. Troops in Operation Iraqi Freedom found that rates of PTSD among service members deployed in Iraq and Afghanistan may be as high as 35 percent. With two million troops deployed to Iraq and Afghanistan, expect another astounding 700,000 veterans will suffer from PTSD. These numbers are double previously projected numbers because unlike other projections, this study factors in delayed onset of PTSD, which is common***."

As the future impact of the scope of PTSD and related illnesses increases, we became concerned about whether reduction in locations and scope of services by the VA was the correct approach. The overall impact of rising treatment costs is very real; however, so is the national commitment to the care and well-being of our nation's veterans. As we considered how to approach our proposal we asked whether there might be methodology to demonstrate how to maintain a high level of care and treatment while at the same time developing a model that could help mitigate costs. Such a model would prove to be an important component for future veterans care in other regions of the country as well.

The vision we developed for the future of the Hot Springs VA recognizes the historic strength and reputation the facility has earned in the past. It builds on that reputation by developing a national demonstration project focusing on treatment and research for PTSD and substance abuse combined with a strong partnership with the community for ongoing patient support. The goal is to provide a cost effective pathway for societal reintegration that can serve as a model for other VA facilities across the country. Often veterans receive initial treatment only to

relapse once back at home. Also, many veterans suffer from a lack of confidence or sufficient work skills to be successful following their initial treatment. While other VA facilities offer compensated work therapy as part of the treatment protocol, the approach offered under this project is different. A community sponsored not-for-profit corporation will create a local Veterans Industry company that will employ veterans to create salable goods, where veterans will be compensated and profits will be returned to the VA to help offset treatment and operations costs. The Veterans Industries Corporation will also serve as a catalyst for the development and growth of Hot Springs. These joint outcomes will serve as a national model for both improved veterans care and rural community development.

The project has additional benefits as well. Because this is a national model focused on improving services for veterans suffering from PTSD and illness related to PTSD it can serve as a center for treatment effectiveness research. In addition, as the Veterans Industries Corporation grows, and potential employment opportunities grow beyond the domiciliary population, the corporation can provide employment for unemployed and underemployed veterans throughout the catchment area. Also, there is a rich environment of higher education options in the Black Hills region. The project will also demonstrate partnerships between the VA, the Hot Springs community, and local higher education providers for ongoing educational options for domiciliary residents and others employed in the enterprise.

The following proposal provides an outline of our vision. However, for a full understanding of the scope of work that went into this proposal it is necessary to review the White Papers which are appended to this narrative. Much of this proposal is dependent on the research, observations, and recommendations that were provided by the many committees involved in the Save the VA campaign.

C. Project Goals

1. To maintain and improve veterans services provided at the Hot Springs VA facility especially in the facility's recognized strengths of PTSD and related substance abuse treatment

2. To attract and serve veterans suffering from PTSD and substance abuse problems from both within the Hot Springs VA catchment area and nationwide as part of demonstrating the value of this potential national model

3. To create a model Compensated Work Therapy program integrated throughout the community of Hot Springs that serves as a catalyst for building work skills, self-confidence and personal direction for Hot Springs VA domiciliary residents

4. To create a viable and sustainable industry to house the Compensated Work Therapy program that can return resources to the VA system to help offset treatment and related costs

5. To develop a partnership between the VA system and the community of Hot Springs to develop and grow this sustainable industry which can serve as a national partnership model

6. To utilize this partnership as a catalyst for the development and growth of the community of Hot Springs

7. To demonstrate this model as a catalyst for partnership and growth of other small rural communities.

8. To provide educational and employment opportunities for domiciliary residents and for unemployed and underemployed veterans living within the Hot Springs VA catchment area

9. To serve as a national center for research on PTSD and substance abuse treatment effectiveness in partnership with the Veterans Administration, national medical research facilities, and the Native American community

10. To demonstrate that increasing the number of veterans receiving care in the facility reduces the per veteran cost to a level comparable (or below) other VA healthcare facilities with multiple campuses

11. To demonstrate that the services and outcomes of this demonstration project are scalable both at the Hot Springs facility and at other VA healthcare facilities

D. Project Summary

1. Developing a Community Partnership Infrastructure

- Create the Hot Springs Community Partnership Corporation
  - A non-profit corporation to serve as the platform for partnership activities
  - Develop a 7 member board of directors with business development experience
  - The Corporation will have the following purposes:
    - To create and oversee the Veterans Industries company
    - To create and manage the Partnership Agreement with the VA
    - To create and manage employment opportunities and protocols
      - The initial hiring priority will be for domiciliary residents
      - As opportunities grow, the second priority is unemployed and underemployed veterans in the catchment area
      - The third priority would be unemployed and underemployed county residents
      - Veterans would be hired in skill areas they either have or want to develop (i.e. marketing, manufacturing, accounting, etc.)
    - To facilitate, in partnership with other organizations, community development activities
    - To manage joint services agreements as necessary between the community, county, and the VA
    - To conduct national seminars and symposia offered in Hot Springs concerning the demonstration project
    - To work with state officials and other agencies to generate seed capital for the Enterprise
- Under the Partnership, establish the Veteran's Industries company
  - Develop the business plan
  - Establish the product line
  - Hire the management staff
- Acquire facilities for the company
  - Utilize vacant buildings in the community
  - Initially rent the facilities with a potential option to purchase in the future
  - Acquire needed equipment
- Establish a partnership agreement with the VA
  - Create domiciliary resident employment protocols and training
  - Establish the revenue sharing agreement

- 75% of the after expenses revenue goes to the VA to offset treatment and related costs
- 25% of the after expenses revenue goes to the corporation for community development, i.e.:
  - Revolving loan fund
  - Economic development stimulus
  - Other workforce development projects

- The City and County enter into a Joint Services Agreement with the VA as opportunities arise

2. Treatment and Medical Services to be provided by the Hot Springs VA

- Because this is a national demonstration project and because the model requires a sufficient number of residents to utilize the work therapy option, domiciliary capacity would be increased from 100 to 200 residents
  - First priority would be the catchment area
  - As capacity allows, the program would draw from veterans nationally building on the existing exemplary PTSD treatment reputation of this facility
- The project would maintain and revitalize phased continuum of care that includes the substance abuse, after care, compensated work therapy, and PTSD and would include the reestablishment of the Medical/Coping Skills team
- Compensated Work Therapy through the Enterprise would be a component of treatment following the initial 28 day intensive treatment protocol
- The number of VA employees would be reviewed and adjusted as necessary
  - To accommodate the larger domiciliary capacity
  - To accommodate treatment protocols
  - To serve as liaison to the Veterans Industries project
- In-Patient services will be maintained
  - The FOIA information and the responses to the Congressional requests for information casts doubt on the statistics provided concerning in-patient services and numbers. Due to either conflicting data or lack of data, services will continue to be provided for a minimum of 5 years to allow new base line data to be collected
  - Because the domiciliary capacity will increase, additional in-patient services will likely be needed in the future
  - The existing medical facilities and equipment will be updated as necessary to assure the highest quality of care during the 5 year demonstration period because currently beds are often full resulting in patients being diverted to other locations.

  - Depending on volume, specialized services would be provided either through visiting specialists or at other facilities as necessary
- Medical services would be enhanced
  - Because of the rural demographic area which serves over 10,000 veterans, inpatient, urgent care and outpatient services will remain as integral components of the facility
  - The in-patient census will be increased to accommodate the increased domiciliary capacity
  - Because of increased capacity due to the demonstration project, appropriate medical services will either be maintained or reestablished. These would include a three bed ICU, same day surgery, dental, and other medical support programs
  - The project will research and implement as necessary, enhanced outreach services such as tele-medicine and a mobile clinic, especially focusing on serving the high number of Native American veterans living on reservations
  - To assure quality care during the demonstration project, full time permanent positions needed to fulfill the mission will be aggressively recruited and retained

3. Facility Renovations and Upgrades

- Appropriate renovations would be made to create additional domiciliary living spaces and to meet existing code and ADA requirements
- An educational facility would be created with sufficient classroom space to accommodate at least 4 simultaneous classes in state-of-the-art classrooms. These will be used for both patient treatment orientation and education and college level classes
- Some or all of the older medical residences would be renovated to provide temporary patient family residences
- Spaces would be identified and renovated as necessary for medical research activities
- The historic nature of the Hot Springs VA facility would be respected and all renovations and upgrades would be conducted as appropriate for a site which has just attained National Historic Treasure status

4. Creating Educational Opportunities

- The Community Partnership Corporation would seek agreements with regional higher education providers to establish outreach programs at the Hot Springs VA for both domiciliary residents and other Veterans Industry employees
  - Western Dakota Tech
  - Oglala Lakota College

  - Black Hills State University
  - Chadron State College
- The college level programs would be targeted toward:
  - Skill building career-based courses (i.e. WDT)
  - General college courses (i.e. Gen Ed)(i.e. OLC, BHSU, CSC)
  - Health related continuing education and certificate programs for domiciliary residents, Veterans Industry employees and VA employees
- Courses would be provided at the VA in the renovated classrooms
- The VA educational facility would also incorporate video conferencing and other educational technology to increase educational options

5. Conducting Research

- Because of Hot Springs' unique rural location it provides an excellent controlled environment for clinical research measuring treatment effectiveness
- For the duration of the demonstration project, the facility would work both with VA medical researchers and those from major medical research facilities to provide and conduct such research. Informed consent would be sought and all research ethics protocols would be followed.
- Because of the high concentration of Native American veterans, research could also be conducted focusing on traditional Native American healing activities
- Treatment protocols showing strong evidence of significant effectiveness would be shared throughout the VA system
- Special research attention would be given to the integration of Veterans Industries as an important treatment component

6. Project Duration and Costs

- Because this project, especially the Veterans Industries component, requires start up time as well as sufficient time to establish and grow the business, it is recommended that the demonstration project be given at least a 10 year duration
- Continuation of the project would depend on demonstrated effectiveness of the project as determined jointly between the Veterans Administration and the Corporation
- Project development would be evaluated every two years with recommendations for project improvement and additional activities provided
- Currently the Black Hills Health Care System of the VA has requested funds for facilities improvements in the system. The estimated cost for physical improvements for this

proposal is approximately $26.3 million. The 30 year life-cycle costs, based upon the historic average for the Hot Springs campus is estimated to be (on the high side) $144 million. Both estimates are less than the estimated costs for options outlined by the VA proposal.

E. Developing Veterans Industries and a Community Partnership Infrastructure

A critical component of this proposal is to create job opportunities for both domiciliary residents as well as underemployed and unemployed veterans in the region. These job opportunities are important for a variety of reasons including providing compensated work therapy for veterans undergoing treatment; providing opportunities to improve work skills or develop new skills; mitigating homelessness, and providing opportunities for veterans to engage in meaningful employment.

We believe that it is also important to look for methodology by which compensated work therapy can mitigate treatment costs for domiciliary residents. Traditional work therapy programs tend to utilize community job opportunities which can help provide employment for patients yet do not provide any return to the VA system. The community of Hot Springs has a keen interest in community development and building or attracting new industry. Recently new planning groups have been formed to promote the infrastructure advantages and location that the community has to offer.

We propose combining the two efforts--- building a model compensated work therapy program that can return revenue to the VA along with growing a sustainable industry that can be an important component of community development. We believe that, if properly developed, this partnership between the VA and community can serve as an important national demonstration model for both the VA system and rural communities.

For those reasons we propose creating a for-profit industry, tentatively titled Veterans Industries (VI), that will engage in meaningful production of salable goods that can be both self-sufficient as well as returning a profit to the company. We propose developing VI on a scale that will gain national attention with national distribution of product. We propose growing an industry that can build a sizable national market share and has the ability to grow as its market expands.

The VI will provide sets of jobs and responsibilities across the company that are reserved for domiciliary residents. These jobs and responsibilities will include production, marketing, accounting, shipping, and many others. As treatment progresses and the residents graduate from the program, they would have the opportunity to compete for full time jobs in VI as they are available. Additional employment opportunities would be made available for unemployed

and underemployed veterans living in the Hot Springs VA catchment area. If additional employees are needed then employment opportunities would be made available to unemployed and underemployed non-veterans living in the area.

The goal of VI is to be self-sufficient and profitable enough to provide for the management and growth of the company while still able to return revenues to the VA system. It is also important that this effort not lead to any new bureaucracy or costs on the part of the VA. We envision VI to attract its own start-up capital independent of the VA system. In order to accomplish this an entity needs to be created that can build the Veterans Industries, provide management oversight, and help provide both the foundation for this effort as well as a vision for the future.

For that reason, this proposal calls for the creation of a non-profit corporation, tentatively titled the Hot Springs Partnership Corporation (HSPC), which can serve as the organizational and management entity. This non-profit entity can serve as both the umbrella organization overseeing the for-profit Veterans Industries as well as the liaison with the VA for coordination of partnership activities between HSPC and the VA, City, and County.

The HSPC will be led by a seven member Board of Directors all of whom will have experience in the creation, leadership, and/or management of substantial business operations. The recruitment for the HSPC Board has already begun with several potential members identified. The HSPC Board will be responsible for the following start up activities:

1. Planning
    a. Establish an Operations Committee
    b. Generate business ideas and select preferred concept
    c. Build the Business Model
    d. Create the Business Plan
    e. Create the Marketing Plan
2. Finance
    a. Audit and reporting controls
    b. Determine early revenue needs
    c. Establish Banking relationships
    d. Establish Insurance requirements
3. Management
    a. Create management team
    b. Create appropriate Boards
    c. Determine required labor needs
4. Legal
    a. Develop Board by-laws

b. Create Organizational documents
c. Secure not-for-profit status with IRS
d. File required Incorporation documents
e. Establish joint services agreement with the VA for revenue capture and other purposes as necessary

These initial activities will be completed within six months of the approval of this proposal.

Following these initial activities, and once the VI product line is determined; the HSPC will be responsible for finalizing the VI business model and acquiring the necessary start-up funding. The HSPC will work with South Dakota officials and other agencies in order to acquire sufficient capital to begin VI operations. Concurrently, the HSPC will identify available sites for VI operations utilizing vacant commercial facilities in the Hot Springs community. The HSPC will also recruit and hire the management team for the VI as well as acquire the equipment necessary to begin operations.

The VI operation will be a for-profit subsidiary of the HSPC whose goal will be to not only cash flow the VI operation, but also plan for the ongoing growth of the business as well as to return revenue to both the VA and to the HSPC. The goal is for 75% of the revenue after expenses to be returned to the VA for costs associated with the Hot Springs VA facility (i.e. patient and treatment costs, etc.), with 25% of the revenue after expenses to be used by the HSPC for community development activities such as a revolving loan fund for business development, economic development stimulus projects, and other workforce and economic development activities. We believe this revenue sharing arrangement can serve as a national model for both mitigation of VA overhead and rural community development.

The HSPC will also serve as the liaison to the community and the VA for coordination of partnership activities. For example, the HSPC can create and manage any joint services agreements necessary with the VA for serving as a compensated work therapy location for domiciliary residents, managing revenue returns to the VA, and other areas of agreement and partnership that may be necessary. The HSPC will also provide on-going reports to the community of Hot Springs and to Fall River County regarding the community development component of the corporation.

While it might be desirable to identify the product line to be created and marketed by VI as part of this proposal, it was decided the most advantageous approach would be to create the HSPC Board and, through their expertise, conduct a thorough market analysis to determine the appropriate product line. It is also anticipated that the VI build out, from inception of the HSPC through start up to take approximately 18 to 24 months. Achieving profitability will most likely take another 18 to 24 months. For that reason, it is important that this demonstration project

be given sufficient time to demonstrate real cost benefits to both the VA and the community partnerships once profitability is achieved. We propose that the demonstration period for this part of the project be at least 10 years. However, we also understand the need to evaluate the ongoing efforts of the HSPC and the VI. We propose a joint evaluation team made up of representation from the VA as well as State, community, and County stakeholders. The team would be charged to evaluate the progress and performance of the HSPC as well as VI on a bi-annual basis. For that reason, the HSPC Board will create a series of projected benchmarks for the development and growth of the partnership and the VI that will be used as part of the criteria for this evaluation.

Because we are proposing a demonstration project, and if it is to have applicability in other settings, it is also important to share the strategies, experiences, successes and challenges of the HSPC and VI with a national audience. For that reason, the HSPC will also have the responsibility of sponsoring, in conjunction with the Hot Springs VA and the community, an annual conference concerning all aspects of this demonstration project. The annual conference will begin in the third year of the project.

Also, the HSPC in cooperation with the Hot Springs VA and other appropriate stakeholders will also provide white papers, materials, seminars and other appropriate support for the national audience interested in replicating this experience. Revenue from these activities will also help to support HSPC activities.

F. Treatment and Medical Services to be provided by the Hot Springs VA

We begin this section with an important assumption. In order to achieve the benefits outlined in our proposal for a national demonstration project, the Hot Springs VA requires a full complement of treatment and other medical services. Contrary to the announced VA proposal of eliminating services, we propose to not only maintain services but to increase them as appropriate to address the health care needs of the rural veterans in the catchment area. It is also necessary to accommodate the increased number of Residential Rehabilitation Treatment Program (RRTP) residents outlined in this proposal, and the anticipated increase of veterans with Post Traumatic Stress Disorder (PTSD) and related problems due to our most recent conflicts.

First and foremost, the Black Hills VA Health Care Service (BHVAHCS) proposal has called for the closure of the Hot Springs campus based upon their assumption of decreasing need (decline in veterans) in the future. Our data, as well as data obtained through our Freedom of Information Act (FOIA) requests, tell a different story. Because we have conflicting information, we propose all treatment and medical services be maintained for a minimum of five years. This is important in order to provide the medical services required to accomplish this demonstration project, and secondly to provide a sufficient period of time to establish new baseline data.

The following components of this section outline the proposed medical services to be provided as part of this proposal, the rationale for providing these services, and implications of the proposal for the Domiciliary Residential Rehabilitation Treatment Program (DRRTP), inpatient services, Community Living Center (CLC), outpatient/same day surgery services, and specialty care.

Proposed Medical Services:

We propose several clinical enhancements and the reinstatement of programming at the Hot Springs Campus. These improvements will provide quality, accessible care for the Rural and Highly Rural Veteran, the Native Veteran, Women Veterans, Homeless Veterans, and those suffering from Substance Abuse and PTSD in the Hot Springs rural and highly rural catchment area as well as those veterans to be served as part of the national demonstration project.

- Expanding the number of beds in the Domiciliary RRTP to 200. Increase programming by providing adequate qualified staff to assess and treat veterans from across the nation participating in this demonstration project.

- Re-establish the medical Intensive Care Unit (ICU) in Hot Springs to accommodate Hot Springs catchment area veterans, thus saving travel time, travel dollars, fee basis charges, and unnecessary hardship on our veterans.
- Increase the number of inpatient acute care beds to 15.
- Increase the number of Community Living Center (CLC) Beds to 15.
- Re-establish Same Day Outpatient Surgery to meet the needs of veterans in the Hot Springs catchment area.
- Adequately staff positions as full time permanent staff to ensure recruitment of highly qualified staff.
- Provide adequate Specialty and Support staff to accommodate the increase in workload.
- Activate policies to encourage and enhance staff retention.

Existing facilities and care:

The Hot Springs Campus currently maintains 10 Medicine Beds for detoxification. There are no operating surgical or psychiatric beds. The facility provides primary care, urgent care, outpatient specialty care, outpatient psychiatry care and minimal outpatient surgery. The inpatient medical unit supports the dialysis unit and provides inpatient care to post-operative ambulatory surgical patients as needed.

The facility maintains a 5 station dialysis unit which serves 20 individuals, both veteran and community patients. This is the only VHA dialysis program in the nation that provides dialysis to non-veterans. It is surveyed under Centers for Medicare and Medicaid Services (CMS). A new remodeled dialysis unit, (not yet activated) will accommodate 7 chairs, bringing the potential dialysis census to 28. CMS guidelines for dialysis units require prompt access to an inpatient facility.

The Hot Springs campus maintains a 100 bed Domiciliary Residential Rehabilitation Treatment Program (DRRTP). The special emphasis programs supported in the Domiciliary include residential substance abuse, PTSD, Women Veterans, Native Americans and Homeless veterans.

Medical support is also provided to the South Dakota State Veterans Home (SVH) with 120 operating beds. The SVH is currently building a new facility which is also located in Hot Springs.

The facility supports Community Based Outpatient Clinics (CBOC's) in Newcastle, Wyoming; Winner, SD; Rushville, NE; Gordon, NE; Scottsbluff, NE, Rosebud, SD; and Pine Ridge, SD.

Rationale for Increased Services:

Rural Access & Service Delivery Location for 10,000 veterans - The Hot Springs campus serves as a critical rural access point for 10,000 rural and highly rural veterans. It is the closest VA Inpatient Unit, comprehensive Primary Care, Urgent Care, and Diagnostic and Specialty Services available to veterans on the Pine Ridge Reservation and surrounding highly rural and rural counties to the south, east and west of Hot Springs.

Health Care Professional Shortage Areas- The following counties in the Hot Springs catchment area are designated as Health Professional Shortage Areas: **South Dakota**: Fall River, Shannon, Todd, Jackson, Mellette, Haakon and Bennett; **Nebraska**: Sioux, Sheridan, Brown, Grant; **Wyoming**: Niobrara, Crook, and Weston.

Native American Access- Of the counties designated as Health Care Professional Shortage Areas, Shannon and Todd County encompass two large Indian Reservations. Inadequate transportation systems on these two reservations compromise access to care. Personal transportation is out of reach for many Native American veterans, and there is very limited public transportation. The only reliable transportation is a VA van operated by volunteers, which runs three days a week to the Hot Springs campus.

Access - Access to health care in this sparsely populated widely spread geographical setting is paramount. Without an inpatient medical presence in Hot Springs, an additional 60 minutes to Rapid City and 100 minutes to Ft. Meade are needed to access quality hospital care for a significant portion of patients who live to the south, west and east of Hot Springs.

Data Inconsistencies- There are significant differences in utilization data between information provided by the BHVAHCS and information obtained in the FOIA requests. The working groups found significant variances in unique patient count. The data received in a FOIA request seemed to indicate far fewer unique count veterans treated by Hot Springs than other national reports which showed an increase in unique count in Hot Springs by 19% over the last four years. The VA Office of Rural Health data shows an increase in the number of rural and highly rural veterans in the Black Hills Health Care System with a decrease in the urban veteran population which includes Rapid City and Sturgis. This contradicts data provided in the BHVAHCS proposal and other planning documents which state the veteran demographic is moving into the urban areas. Data also reveals that there is a significant duplication of the services provided to veterans who live in Pennington County by FM and RC CBOC.

Demographic statistics regarding where veterans actually live versus where they receive treatment showed that a significant number of veterans are now required to drive an additional 180 miles to and from Ft. Meade for services had been provided at the Hot Springs campus this day long drive is often for a 15 minute appointment. Removing these services from Hot Springs has placed additional hardship on many veterans, especially veterans from the Pine Ridge and Rosebud Reservations, for whom travel is a particular barrier to care.

Access to validated, internal and external data systems will prove that the current services offered at the Hot Springs VA are not adequate. Increasing acute Inpatient capacity, Community Living Center capacity, Specialty Services, and particularly Same Day Surgery in Hot Springs will result in the right service in the right place at the right time for the many rural and highly rural veterans in this area.

Staffing Shortage Consequences- Due to reduction in staffing, the Domiciliary Residential Rehabilitation Treatment Program (DRRTP) census has significantly dropped in the last few years. Consequently, fewer services are being offered. Reduced or eliminated services include family programming and the Care Management Team. This team provided holistic care management to meet the patient's psychological, medical and functional needs for select veterans whose age, medical or psychiatric condition result in a temporary or permanent need for supportive or structured living. Many of these veterans are now forced to live in the Mission in Rapid City. Fewer week-end and evening offerings are now available. Multidisciplinary teams for the addictions continuum have been decreased from three to one. The Assessments Unit Multidisciplinary process has been reduced. There is usually a wait list for care or veterans are asked to choose a date in the future as their "desired" date. The wait time for veterans to enter the PTSD program during Quarter 4 of FY 11 was 157 days or almost six months. All of these reductions have resulted in long wait times and fewer veterans being treated. Therefore, fewer veterans receiving the care they need.

Staff Competency- An argument has been made about the potential competency of staff because they do not routinely perform certain tasks. This argument has been used as a rational to further degrade clinical services at the Hot Springs facility. However, employees can partner with service-area community hospitals and other VA facilities in VISN 23 to achieve and maintain important competencies. Simulation training is already offered at the Hot Springs VA. We believe these opportunities mitigate this concern. It's important to state that the Hot Springs Campus, including Surgery and Specialty Service is accredited by The Joint Commission. This national accrediting agency has not identified any significant systemic quality issues at the Hot Springs Campus.

Recruitment- A robust campaign to recruit professional staff needs to be supported. This should include nation-wide advertisement, offers of permanent employment, and enhancing attraction of positions by providing information about education debt-reduction programs and benefits. The argument that professional employees do not want to live in a small town is unsubstantiated, especially when looking at recruitment success in other rural areas of the country.

Cost Containment- Enhancing and reinstating Inpatient Services will potentially save several million dollars per year. Both the current costs of ambulance transportation ($500,000 paid to the Hot Springs Ambulance Service alone in FY 11) and the costs of inpatient care at Rapid City Regional Hospital will be greatly reduced with the addition of an ICU in Hot Springs. The increase in veterans treated in this facility would reduce the cost per patient, bringing costs more in line with national Veterans Health Administration (VHA) average cost per patient.

Community Hospital Availability- Many components of the BHVAHCS Proposal clearly rely on the Fall River Health Care System and other small community hospitals throughout the Hot Springs catchment area to assume care of the veterans currently served by Hot Springs. The White Paper from Fall River Hospital (Appendix A) clearly states the position of the leadership of the Fall River Hospital. The conclusion of their white paper is quite simple: Routine admission of veterans to FRH for inpatient services does not appear to be a viable option financially or logistically.

The Fall River Hospital's inability to absorb veteran services within the VA guidelines will be replicated in other small communities targeted by the BHVAHCS Proposal. The position of the Fall River Hospital Board of Directors, compounded by the fact that the entire catchment area of the Hot Springs facility is considered a health care shortage area for Mental Health, Primary Care, Dental and Medical Care, makes it indisputable closing the HS facility would have a significant detrimental impact on the care of rural and reservation veterans.

Details of Proposed Additional Services:

To address the issues that prohibit adequate veterans care, a series of additional services are proposed. These services are necessary to promote and sustain healthy Domiciliary Residential Rehabilitation Treatment Programs (DRRTP).

Domiciliary Residential Rehabilitation Treatment Programs Services:

- **Substance Abuse Residential** Treatment – 40 Beds – This program would include explanation of the addictive and recovery process through groups, classes, and individual counseling. Specialty groups include grief, Adult Children of Alcoholics (ACOA), domestic abuse, anger, ethnic issues, assertiveness, gender and gambling issues and a family program. The demand for this treatment is significant and will contribute substantially to the health of veterans and their families. Data shows that 76% of homeless veterans experience alcohol, drug or mental health problems. To end veteran homelessness, it is imperative that veterans have immediate access to a comprehensive substance abuse treatment program. Sobriety is the cornerstone that most homeless veterans need to begin rebuilding their lives.
- **After Care Treatment** – 40 Beds – The aftercare treatment phase would be a semi-structured environment fostering a continued addiction free lifestyle through therapeutic programming to develop life skills. The aftercare program provides the time and support for the veteran to build a foundation of sobriety with a goal of returning to independent living. Veterans in this phase are often employed part time in the Incentive Work Therapy Program. The IT program allows the veteran to slowly adjust to the demands of a work schedule. The IT program will be integrated within Veterans Industries.
- **Compensated Work Therapy** – 32 beds – Veterans in this phase would be ready for work. They would be entered into training or a job which meets their abilities through the Veterans Industries component of this proposal. The VI will also offer the potential of permanent employment. Transitional Housing on station will supplement the 32 beds. Transitional housing offers a semi-independent living environment which is the final step before independent community living. At the present time the Hot Springs Campus has one TR house. This proposal calls for the renovation of four existing medical residences to provide additional transitional housing. This housing will be necessary to meet the demands of the growing program.
- **Care Management Team** – 50 beds – This phase would provide holistic care management to meet the patient's psychological, medical and functional needs. This support is critical to veterans whose age, medical or psychiatric condition result in a temporary or permanent need for supportive or structured living. Medication management, psychiatry and psychiatric medical care would be provided in this flexible, semi-structured program. This is not designed to be a permanent living arrangement, but will fill the needs of those in transition to a higher level of care, or those who need more time in a supportive environment.

- **Post Traumatic Stress Program** – 30 beds – The PTSD program would utilize a Cognitive Behavior Therapy Model. This is a 45 day program. Treatment components would include: one-to-one mental health assessment and testing, medication management, one-to-one psychotherapy, family therapy, group therapy (covering topics such as anger, stress, PTSD issues for veterans with combat support roles, and relationship issues). This program would also provide treatments shown by research to be effective in treating veterans such as cognitive behavioral therapy or prolonged exposure therapy. In addition to PTSD, the program would also address coping skills for veterans with mild or moderate traumatic brain injury (TBI). The complex care needed by the large number of veterans with both TBI and PTSD issues is of major interest to veterans, veteran's organizations and the VA.
- **Women Veterans** – The needs of women veterans are met with the services of the programs listed above. Currently, a separate ward in a separate building is used for female veterans. Additional services from the Women's Veterans Coordinator and the OIF/OEF staff would be available to meet the needs of women veterans. An increase in the number of female veterans needs to be matched with an increase in women's health care services.
- **Family Therapy** – This program would be revitalized with an emphasis on family centered care. Temporary residences for families who wish to participate in family therapy would be established in the renovated medical residences. Family therapy is crucial to ensure successful reintegration of veterans with families.
- **Legal and Benefits Counseling** – Veterans have repeatedly indicated a need for legal assistance. Alcohol and drug addictions often are complicated by involvement with the legal system. When veterans begin to heal, their first goals are to deal with past legal issues. Another service that is currently lacking is access to a veteran's benefits counselor. In the past the facility housed a VBA counselor on site. When this position was not re-hired, it was detrimental to the veterans in not only the DRRTP, but the surrounding rural and highly rural communities. Both of these services would be reestablished through this proposal. These services are necessary to ensure a successful recovery for veterans.
- **Learning Center** – This is discussed in Section H of this proposal. Input we have received from current DRRTP veterans indicates their desire for a virtual learning center, learning support, virtual and onsite classes and a library.
- **Staffing requirements** – Staffing adequate to re-establish and enhance the programming would be determined by VHA staffing guidelines. It is clear that additional staff will be required to accommodate the larger capacity of the DRRTP, to ensure the application of up-to-date treatment protocols, and to serve as liaison to the Veterans Industries project. As previously mentioned, it is highly likely that such additional staff

would be required regardless of location due to the projected increase in the number of veterans with PTSD and related illnesses.

Inpatient Care, Community Living Center, Specialty Care, Surgery and Support Services:

- **Inpatient Bed Capacity** - The current demand indicates a need for 15 fully staffed inpatient beds. The current capacity of the inpatient unit is limited by the staffing levels. The average daily census is not reflective of the needs of the veterans in the Hot Springs catchment area. Diversions and transfers are frequent occurrences. This means that veterans who would normally be treated in Hot Springs are fee-based to a private facility or transferred to Ft. Meade. The census would increase if staffing was increased and stabilized with permanent full time positions to meet the real needs of the catchment area.
- **ICU Bed Capacity** - In concert with the newly established Tele-ICU connection with the Minneapolis VA, a three bed ICU would be returned to Hot Springs. An ICU and its services will greatly reduce the need for fee basis admission to Rapid City Regional. The costs of a greatly expanded fee basis program are currently absorbed by the BHVAHCS and have served to increase the cost per patient. The ICU capacity would be coordinated with staffing levels in accordance with the needs of this proposal. This would be determined by clear admission criteria and a robust competency program that may include rotation to another facility for updates/training or virtual training. Utilization of state of the art simulation training, newly available in Hot Springs, would also provide opportunities for competency enhancement.
- **Community Living Center Bed Capacity** (CLC) - Current demand indicates a need for 15 fully staffed inpatient beds and 15 fully staffed CLC beds. There is a lack of Nursing Home or skilled nursing facilities in South Dakota. An increase in beds would increase availability of this service to rural and highly rural veterans served by the Hot Springs catchment area.
- **Decreasing Transfers** -These bed capacity additions will greatly decrease the amount of fee basis, and decrease the unnecessary and difficult transfers to other facilities. It is not unusual for Rapid City Regional, Ft. Meade and Hot Springs Inpatient Units to be full. The current restraint of bed capacity is strictly based on available staff. This increase will also afford absorption of the medical needs of an increased DRRTP census. Veterans entering into substance abuse treatment are often in need of inpatient detoxification services. Staffing commensurate with the needs of a 15 bed unit would

be provided on a full time, permanent basis. This will provide stability that would enhance recruitment and retention of qualified staff.

- **Out Patient and Same Day Surgical Services** - We propose to reinstitute the same day surgical services to the Hot Springs VAMC. Information obtained through FOIA 2012-0028 indicates that In FY 2011, 450 Hot Springs catchment patients had surgical procedures performed Ft. Meade. In FY 2011, 655 Hot Springs catchment area veterans were referred to non-VA facilities for procedures. This represents over 1,100 veterans, many of whom could have received same day surgical procedures in Hot Springs if staffing were provided. While we understand that there are limitations on the complexity of surgical procedures that Hot Springs should provide, data reveals that there is an adequate workload in the Hot Springs catchment area for procedures such as screening and diagnostic endoscopy (upper GI and colon exams). With the increase in domiciliary residents in the domiciliary SA/PTSD treatment program, as proposed for this demonstration project, the case numbers would only increase. While not all of the 1099 procedures performed elsewhere should have been provided at Hot Springs, it is clear that there is an adequate same day surgery workload in this rural and highly rural population.
- **Caseload** - We estimate that the potential case load for a general surgeon would exceed 500+ procedures per year based on the veteran population that are currently served. Adding to the general surgery case load are cases that the specialty surgeons--orthopedic, urologic and ophthalmic--could treat in an ambulatory, out-patient setting. All of these procedures were successfully done at HSVAMC and could be done again when the surgical services are re-established.
- **Standards** - VA Hot Springs has consistently met The Joint Commission hospital standards, including operative standards. In addition, Surgical Service follows Association of Operating Room Nurses (AORN) guidelines for nursing practice in the OR. Few, if any, small rural hospitals put themselves through the rigorous ordeal of a JCAHO inspection and evaluation on a regular basis. Similarly, few small rural hospitals have a dedicated operating room and post anesthesia recovery staff of RNs who are trained and maintain their specialized skills. The operating room is a specialized and increasingly technically challenging site for care delivery, and veterans deserve care from adequately trained and skilled providers.

Additional Support and Specialty Services

- **Fully Functioning Medical Facility** - To provide high quality, cost effective, and accessible care to the increased number of DRRTP veterans and the 10,000 veterans served by this rural access hospital, a fully functioning medical facility must be

reinstated. Clinical services and ancillary support services must include respiratory care, adequate inpatient beds (15), adequate CLC beds (15), adequate ICU beds (3), same day surgery, medical and surgical specialty care, pharmacy, medical rehabilitative services, clinical dietetics, optometry, diagnostic radiology, and lab. In addition, full time dental services, a ventilator program, fully staffed (24/7) ultrasound and echocardiogram services will be reinstated. Establishing Computerized Tomography (CT) services 24/7 would eliminate the expense of transporting patients to Fall River Hospital or Rapid City Regional via ambulance services. Cardiology, Internal Medicine, Urology, and Ear/Nose/Throat clinics should also be reinstated to support the increasing demand. Cardio-pulmonary rehab services would be fully developed at this site.

- **Clinical Pharmacy** - Adequate Clinical Pharmacy Services are particularly important with the increase in DRRTP residents. Close monitoring of self-medication and staff administered medication by clinical pharmacy staff is a requirement for safe care in a residential program.
- **CBOC Parent Site** - In addition, the Hot Springs VA should be designated as the parent site for all service area CBOCs. Diagnostic equipment, surgical equipment, all other equipment, supplies, space, and management support would be provided to all clinical areas. Additional needs determination will be made in collaboration and the staff of the Hot Springs Campus. All areas will be supported with adequate, full time, permanent staff.

G. Facility Renovations and Upgrades

This National Demonstration Project calls for the upgrade and renovation of the existing historic structures at Hot Springs. Currently comprised of several buildings, the 105 year old facility is in remarkable physical condition. The Hot Springs VA facility has demonstrated great flexibility and ability to change over the years. One of the contributing elements of this flexibility is the layout of the campus and the ability for historic structures to easily adapt to meet the needs of a changing veteran community and evolving therapies. Its rural setting and history of care contribute to its century long success in healing our nation's veterans.

Upon its completion in 1907, the VA campus contained an administration building, a service building, bath house, chapel, library, laundry, and a six ward building for treatment (the current Domiciliary). The facility was designed like a ships wheel and constructed to maximize cool breeze, natural sunlight, breathtaking vistas, and a variety of therapeutic settings to meet the needs of various patients. Features included the large courtyard, an inner circle measuring 180 feet in diameter, and the upper arcade, which was heated during cold weather. The large circular fountain and cool lounging areas provided a serene environment in the summer. An orchard containing 1,000 trees provided apples, pears, plums and cherries to the patients at the Sanitarium. A tuberculosis treatment facility was eventually constructed, but became unnecessary and was replaced 16 years later to make way for the new hospital building in 1924. The Conservatory and Green House were built in 1913 and still stands today. Construction of many new buildings was completed to support, sustain, and grow the quality of health care provided at Hot Springs.

In 2011, the Hot Springs VA was listed as historically significant and as a National Historic Landmark. The Hot Springs VA is also listed on the National Register of Historic Places and is the core of the Hot Springs Historic District. The area is also considered sacred by many Native Americans on account of the healing spring waters, centuries old history, and the number of Native American Veterans that have been assisted at the VA. The National Trust for Historic Preservation (NTHP) recently recognized the VA's plan for decommission and the detrimental effects the plan would have on the historical integrity of the Hot Springs campus. In March of this year, the NTHP designated the Hot Springs VA as a National Treasure and has committed resources towards its historic preservation as a functioning healthcare facility for veterans.

The proposed renovations will address a variety of elements:

- Appropriate renovations would be made to create additional domiciliary living spaces and meet existing code, ADA compliance, and VA residential and inpatient standards. This domiciliary space exists already, but can be economically updated to provide

private or semi-private rooms with closer bathrooms for residents. These rooms are necessary to accommodate the increased number of patients in the programs. While the facility is currently ADA accessible and meets existing requirements, some facilities will require minor adjustments to existing ramps to make the facility 100% ADA accessible. Updates such as tunnels, bridges, or elevators will also contribute to ADA accessibility. Renovations will be conducted with VA clinical standards for veteran care in mind. It will be necessary to follow some historic preservation standards during renovations. These standards are typically aimed at modifying the current historic space to make it successfully work with the new proposed activity while maintaining the historic integrity of the setting and function of the building.

- An educational facility would be created with sufficient classroom space to accommodate at least four simultaneous classes in state of the art classrooms. These classrooms will be used for patient treatment and orientation as well as educational college level classes. Existing buildings or rooms can be easily and economically modified to accommodate the educational needs outlined in this proposal. These classrooms would be multipurpose, suiting the needs of patients, VA employees, local veterans in the catchment area, and community members.
- Some or all of the older medical residences will be renovated to provide temporary patient family residences. This type of short term living space for visiting families of patients will be necessary as the therapy program expands to including family counseling and reintegration skills. This type of housing provides an opportunity for the family to participate in the patient's healing. This also gives the patient insight and important skills for their departure from the VA and return to society. Patients, at times, relapse when presented with stressful situations (such as family life and dynamics) and return to the program. A therapy program that provides integrated family counseling with onsite short term housing for families will reduce the number of relapses for many patients. The renovations of these residences will occur as the program demand increases.
- Spaces would be identified and renovated as necessary for medical research activities. Ongoing research is imperative to successfully treating and healing veterans. With the current under-used facilities and the ease at which these facilities can be modified, the opportunity to make the Hot Springs VA a national example of veteran's health research is immense. Clinical research provides the opportunity for cutting edge treatment, partnerships with educational institutions, and an increased number of well cared for veterans.
- The historic nature of the Hot Springs VA facility would be respected, and all renovations and upgrades would be conducted as appropriate for a site which has just attained

National Historic Landmark Status. The Veterans Industries will facilitate certification of compensated work therapy patients in historic preservation practices. The standard operating and maintenance plan for the Hot Springs campus will continue to be determined and directed by VA facilities staff. The work will be conducted by VI employees. This program will be a national model and success story for federal agencies and will illustrate its ability to successfully administer a therapy program as well as a Section 110 program, per the National Historic Preservation Act (NHPA). Renovations necessary to the current campus to comply with the future demands would and could be completed through this program. Aspects of employment, contracting, regulations, and guidelines can be taught through this program. Participants will eventually leave the program with accreditation in a skill they are also able to use after their rehabilitation. The program would assist in the following ways:

- Labor costs would be reduced through the program.
- The historic preservation maintenance of the VA will be met through cost effective approaches.
- The veterans will receive a new, marketable skill, contributing to their future success.

H. Creating Educational Opportunities

An important component of any treatment protocol is the availability of educational opportunities for residents. One of the advantages stated in the original Black Hills VA proposal for moving the domiciliary to Rapid City is the proximity of local schools and colleges. We agree that convenient educational facilities are important.

For that reason, we propose to enter into agreements with educational providers to establish outreach programs at the Hot Springs VA facility. These programs would be available for not only domiciliary residents, but also Hot Springs VA staff and community members. In addition, these programs would also be available to Veterans Industries employees.

A unique feature of providing education programs at the Hot Springs VA facility is the ability to couple learning with the compensated work therapy program offered through VI. In other VA facilities, education and work are often separate activities. Through our proposal, coursework could be tied directly to work skill development. This is similar to internship programs offered by most colleges. The advantage provided in this proposal is to manage the integration of coursework and workplace skills through the treatment protocols.

The HSPC in partnership with the Hot Springs VA would seek agreements with the following institutions for outreach programs to be located in Hot Springs:

- **Western Dakota Tech**

  Western Dakota Tech provides a wide variety of career programs in allied health, manufacturing, business, technology, and related fields that lead to the Associate of Applied Science degree or a professional certificate. The institution has articulation programs with most State four year institutions. Additionally, most of their programs are designed for career entry following the AAS degree or certificate. Finally, the institution has a wide variety of developmental programs and general education programs that can be offered to prospective students regardless of previous educational experience. The main campus is located in Rapid City.

- **Oglala Lakota College**

  Oglala Lakota College is a four year institution providing a variety of bachelors and graduate programs. An important component of the College is their focus on providing educational experiences that also embody Lakota culture. Given the anticipated large number of Native American veterans which could be served by this demonstration project, we believe it is important to provide opportunities for this stakeholder group as

well as others who might wish to learn more about what this College has to offer. The College has two campuses, one in Rapid City and one located on the Pine Ridge Reservation.

- **Black Hills State University**

  Black Hills State University is a regional four year institution that offers a wide range of degree programs at the undergraduate and graduate level. The institution is well known for its teacher education programs as well as the quality of its instructors in all fields. The main campus is located in Spearfish, SD, about 80 miles from Hot Springs.

- **Chadron State College**

  Chadron State College is a four year institution that also offers a wide range of degree programs. The College is located in Chadron, NE, about 50 miles south of Hot Springs. Chadron State would provide opportunities for Nebraska residents to participate in educational programs at in-state tuition rates.

If these agreements prove advantageous for the institutions involved, the HSPC could also reach out to institutions in other surrounding states. By so doing, the domiciliary residents could have a variety of educational opportunities from which to choose, many offering in-state tuition rates.

To assure that these outreach programs are advantageous for the participating institutions, and to avoid unnecessary duplication, there would need to be some level of agreement over curriculum responsibilities. For instance, WDT offers skill building career-based programs. Others offer different sets of programs. The goal would be to provide the widest variety of educational choice and opportunity in one convenient location.

Coursework would not be restricted to only domiciliary residents. To help provide the necessary number of students to support the outreach center; courses would also be available to other VI employees as well as residents of Hot Springs and other nearby communities. Additionally, the participating colleges could also provide continuing education programs and other services for Hot Springs VA employees.

Because many colleges now utilize distance learning technology, we propose to renovate space on the Hot Springs VA campus that would include four state-of-the-art classrooms. These classrooms would include traditional teaching and learning furnishings as well as video conferencing, audio conferencing, and on-line capabilities. The classrooms could be used for the college outreach programs, as well as classroom space for other purposes such as orientations, meetings, etc.

These classrooms would each be about 600 square feet and outfitted with tables, chairs, Smart Board, projection system, computer, screen, and a high definition monitor. The cost of renovating and outfitting the classrooms would be about $25,000 per room, or an estimated total of $100,000.

Finally, should additional space be required, the former Hot Springs Community Hospital facility is also available. The current manager of the facility has indicated his desire to utilize that space for postsecondary education as well. We propose that the HSPC evaluate both alternatives and select the one which is most cost-effective and practical for the intended students.

I. Conducting Research

Research is necessary to provide the best veteran care possible and to monitor the success and potential of this National Demonstration Project. The open sharing of research results will facilitate any changes or adjustments that need to be made to the project, as well as learning points imperative to changes in veteran health care, therapies, or treatment techniques.

- Hot Springs' unique rural location provides an excellent controlled environment for clinical research measuring treatment effectiveness.
- For the duration of the demonstration project, the facility would work both with VA medical researchers and those from major medical research facilities to provide and conduct (with informed consent) such research. The VA currently has an outstanding Health Services Research and Development Services (HSR&D) division. This division is comprised of Centers for Excellence, usually VA facilities or educational institutions that address veteran health issues. Currently, all Centers for Excellence are located in major urban areas. With the exception of Michigan, Illinois and Indiana, all Centers for Excellence are located in states that border the US and none are located within a 15 -20 hour drive of the center and heartland of our country. Most Native American veterans and many veterans living within the interior of the US do not have access to VA research facilities or the outstanding care that they provide. Such research can focus not only on national issues affecting veterans, but also regional and local issues that may not affect veterans in urban settings. Establishing a research program and possibly grooming the Hot Springs facility as a Center for Excellence will enhance patient care, satisfaction, and VA success on a national level. Should the project be a success, the VA could determine after 10 years if the Hot Springs facility is adequate for a Center of Excellence designation.
- The high concentration of Native American veterans suggests that research should also be conducted on traditional Native American healing activities, including sweat lodges, mineral water therapy, etc. The Hot Springs area and current facility is considered a place of traditional healing among many Native Americans and have been for several hundred years. Traditional healing methods fairly unexplored in modern clinical medicine. Research into traditional healing practices may provide new and successful treatments that are currently unknown. This research could encourage currently untreated Native American veterans in the catchment area to enroll in the Hot Springs treatment programs and provide long term and sustainable practices to traditional cultures.
- Treatment protocols showing strong evidence of significant effectiveness would be shared throughout the VA system in conjunction with the HSR&D.

- Special research attention would be given to the integration of Veterans Industries as an important treatment component. As a National Demonstration Project, this research could provide alternatives to other federal agencies charged with increasing demands and tasks.

J. Project Duration and Costs

We acknowledge that the scope of this proposal is large. However, we also believe that its success has important implications for both the VA system as well as rural communities across the country. For that reason, the elements of this proposal need sufficient time for development and implementation. We propose the following timelines for the overall project:

1. **Treatment and Medical Services**

   First of all, because of the scope of the project and the increase in domiciliary residents from 100 to 200, and because the VI will also employ other veterans from the catchment area, we propose that the treatment and medical services portion of this proposal be allowed to run for a minimum of five years at the level of service outlined in Section F of this proposal. This represents an important guarantee of a level of service commensurate with the scope of this proposal and the anticipated needs of veterans to be served by the Hot Springs VA in accordance with this proposal. FOIA information we've received conflicts with the VA's data regarding the number of veterans served by the Hot Springs VA. Because of this, a five year data collection period can serve to establish accurate baseline data concerning services offered and number of veterans served.

2. **Veterans Industries**

   It is anticipated that the creation of the Hot Springs Partnership Corporation and the required market research and business planning will take approximately six months to complete. Further, obtaining the seed financing and establishing the Veterans Industries Company will take an additional 12 to 18 months. Finally, time to profitability, when resources can be returned to the VA system, will most likely take another 12 to 18 months. For that reason, we propose that this part of the demonstration project be given a minimum of ten years to allow sufficient time to establish the company, obtain profitability, and chart the scope of revenue that can help offset VA operational costs.

3. **Project Evaluation**

   We propose that evaluation criteria for the different elements of this proposal be established jointly between the HSPC, the VA system, and the local governments. Additionally, the HSPC would establish benchmark timelines for different phases of VI development and implementation. Evaluations of the VI and other proposal elements would occur every two years starting at the end of the second year of the project. An

evaluation report would be prepared and shared within the VA system and publically. This report would outline progress, successes, and challenges faced by the project and would include recommendations for future consideration.

4. **Project Continuation**

   Following the initial project period, the continuation of the project would be based on successfully meeting the project benchmarks and the overall recommendations of the evaluators.

5. **Project Dissemination**

   The HSPC would be expected to host a bi-annual conference concerning the experiences learned from the project and recommendations for others considering a similar project. Additionally, the HSPC would provide white papers, material, and other supporting activities for national dissemination. This would be done on a revenue generating basis.

The other critical component of this demonstration project is the anticipated cost. It should be noted that the HSPC and Veterans Industries components of the proposal will be self funding. There will be no expectation for funding from the VA system for this portion of the project. Additionally, the demonstration project will not add to the overhead or bureaucracy of the VA system as this work will be done by the HSPC through a joint agreement with the VA.

Staffing costs for maintaining treatment and medical services may add some additional costs beyond what the Black Hills Health Care System currently budgets. However, because the scope of this demonstration project will increase the number of veterans served, and because it is anticipated that the overall number of veterans requiring PTSD and related treatment will increase significantly over the next decade, the VA system will need to be anticipating these additional costs in any event.

The major evaluative factor concerning costs is the question about whether it is more cost effective to build new facilities in another location or to renovate the existing Hot Springs VA campus. The details, rationale, and requirements for renovating the Hot Springs VA campus are provided in Section G of this proposal.

In summary, the anticipated life cycle cost for a new domiciliary constructed in Rapid City and a new CBOC in Hot Springs was estimated by the VA analysis to be slightly over $148 million.

The estimated cost of renovating the current Hot Springs campus is estimated at approximately $26.25 Million as outlined below (See Appendix B). Using the historic (15 year) annual average of $8.89/sq. ft. for maintenance of the campus, the 30 year life cycle cost for the Hot Springs

facility is estimated to be $144,000. However, we also believe the VA cost estimate for maintaining a vacated Hot Springs facility is about $1.5 million per year too low. It that is the case, the VA Rapid City option would be increased by about $45 million over the 30 year life cycle, resulting in a total for that option of $193 million.

Projected Costs for the Hot Springs Campus Renovation:

Project	Estimate	Total
Architectural Design funding	$17,670,000.00 total project x 10%	$1,767,000.00
Complete remodel of B level ramps from lower arcade to B wards. Building 4 has already been completed with these modifications and serves as a great example.	$15-20,000 x 5 (Bldgs. 3, 5 – 8)	$100,000.00
Install 2, 3 or 4 stop elevators	$160-240,000 x 3 (Bldgs. 5, 7, 8)	$720,000.00
Remodel all wards for single and double occupancy rooms	$750,000 x 11 (3B and 5B are already remodeled which is why the number is 11 instead of 13)	$8,250,000.00
Tunnels between Bldg. 3 & 4 and Bldg. 6 & 7	$160,000 x 2 (Note the savings of building tunnels as compared to installing elevators)	$320,000.00
Separate family, singles with children, and/or female housing all with handicap access	$50,000 per bed x 40	$2,000,000.00
Handicap parking between Bldgs. 3 & 4 and where new housing is added	$10,000 per vehicle x 40	$400,000.00
Handicap ramps for west end of street level entrance Bldg. 7	$35,000 per ramp x 2	$70,000.00
Bridges to allow access to upper arcade and meet Historic Preservation guidelines	$250,000 x 2	$500,000.00
Green standard upgrades to provide better insulation and thermal windows (inside envelope) to meet Historic Preservation guidelines	$330,000 per bldg. x 11 (Bldgs. 1 – 11 = Entire Dom Complex)	$3,630,000.00
Green standard upgrades to update boilers for dual source fuel to add Liquid Natural Gas	$420,000 per boiler x 4	$1,680,000.00

Renovation of four current medical residences into apartments to house additional domiciliary families	$250,000 per building x 4	$1,000,000.00
Renovation of space to create and equip 4 classrooms @ approximately 600 square feet per classroom	$25,000 per classroom x 4	$100,000.00
Add second floor to the East wing addition for state-of-the-art surgery suites and updated air handling and storage areas	$2,850,000	$2,850,000.00
Renovate the old surgery area for recovery rooms and the west end for specialty clinics	$1,300,000	$1,300,000.00
Convert south wings of bldg. 12 to 15 bed in-patient ward.	$200,000	$200,000.00
Convert north wing to allow for more specialty clinic space	$780,000	$780,000.00
Renovate ward one east for continued in-patient care	$580,000	$580,000.00
ESTIMATED TOTAL		**$26,247,000.00**

Note 1: The last seven cost items are not included in Appendix B as they were added following the completion of that white paper.

Note 2: This estimate does not include any possible costs for asbestos removal or lead paint removal.

Note 3: The estimated 30 year life cycle cost for this proposal is estimated to total between $134 million and $144 million depending on construction options. For comparison this proposal uses the higher estimate.

It is our estimation that the cost of maintaining the Hot Springs campus facility, and making appropriate renovations to upgrade the existing physical plant and to accommodate necessary changes to incorporate this project, would be less than half of the estimated cost of moving the facility to another location. Also, maintaining the current facility and incorporating the elements of this demonstration project would provide significant benefit not only to veterans and the residents of Hot Springs, but also, through their actions, serve as a national model for approaching both veterans care in a rural environment and rural community development that can have far reaching national impact.

K. Additional Advantages of a Project in Hot Springs

- The Hot Springs facilities are currently in place and of sufficient size to accommodate this program
- The cost of renovating existing facilities, including ADA requirements, for this project is less than new construction
- The Hot Springs community is willing to work as a significant partner in creating and developing the Veterans Industry concept
- The community has available commercial spaces to house the Industry
- The community culture is supportive of the veteran community and the important role played by the resident VA treatment programs
- The medical facilities are in place, although they will require some updating
- The facility is in a rural setting which provides some level of a controlled environment for the project
- The Hot Springs VA already has an excellent national reputation for quality care of veterans suffering from PTSD and substance abuse problems which will allow for a quicker project start-up
- The demonstration project provides visibility for the BHHCS and for the State of South Dakota

L. Summary

In summary, this proposal recommends the following actions:

1. Establish a national demonstration project for veterans care in a rural environment

2. Build on the Hot Springs VA's national reputation for PTSD and related substance abuse treatment

3. Increase the capacity of domiciliary residents from 100 to 200 for the duration of this demonstration project

4. Maintain and grow both the inpatient and out-patient services provided by the Hot Springs VA

5. Maintain the current facilities and enhance staffing for a minimum of 5 years to establish new base line data

6. Create a community partnership corporation to establish a Veterans Industry to provide compensated work therapy opportunities for domiciliary residents as well as job opportunities for unemployed and underemployed veterans in the catchment area

7. Grow profitable Veterans Industry that can return revenue to the VA system to help offset treatment costs and to provide revenue for community development

8. Establish an evaluation protocol for this project to be conducted every two years

9. Establish a dissemination strategy for sharing the results of the demonstration project with a national audience

10. Create opportunities to add to the body of knowledge by inviting research opportunities afforded by the demonstration project

11. Create joint agreements with regional colleges and universities to provide educational opportunities for domiciliary residents, local veterans and other citizens, and to provide continuing education opportunities for VA staff

12. Renovate the existing Hot Springs VA campus to both upgrade existing facilities and to accommodate this project at a cost significantly less than building new facilities in another location

13. Maintain the historic nature of the Hot Springs VA campus

14. Create a model through this demonstration project, that can address the increasing numbers of veterans suffering from PTSD and related illness over the coming years.

15. Demonstrate that the VA system and a local community can form an effective partnership that provides critical services for our nation's veterans while at the same time providing new opportunities for the VA system and our nations rural communities.

Building an Integrated Veterans Support Community

Appendices

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Appendix A: Fall River Hospital Committee White Paper

Committee members include Rich Olstad, president of Fall River Health Services (FRHS) board of directors; Rich Nelson, past president of FRHS board; Garry Strauser, MD, vice-president of FRHS board and former staff and fee-basis radiologist at Hot Springs (HS) VA; Carolann Schwarzenbach HS City Council member; Barb Fetters, MD, staff physician at HSVA; and Paul Smith, Pastor of Prairie View United Methodist Church.

Topics to be presented in this paper:

- Discussion of VA's official public contacts and of FRHS board's contacts with VA officials;
- Discussion of general differences between veteran care in a private hospital, such as Fall River Hospital (FRH), and care provided by a VA facility, including discussion of unique challenges confronting veterans and those providing their care;
- Comparison of services provided at FRHS and the HSVA; 4) Charges for inpatient care at FRH;
- Results of research of various VA hospitals, clinics, or programs that have been closed or downsized or targeted for same; and
- Comments and suggestions of committee members.

Note that the term "he" is not gender-specific.

<u>Discussion of VA's official public contacts and of FRHS board's contacts with VA officials is as follows:</u>

The proposal presented by Stephen DiStasio (previously Acting Director and now Director of VA Black Hills Health Care System, which includes HSVA) and VISN (Veterans Integrated Service Network) leadership, starting at the December 12, 2011 employee and community town hall meetings, included the option of using FRH/FRHS for inpatient and outpatient care, possibly co-locating a new VA clinic at FRH. The latter concept was presented, again, in the February 12, 2012 letter that the VA sent to all enrolled veterans.

Upon hearing the initial announcement of the proposal in December 2011, members of the FRHS board were quick to point out that they had no prior knowledge that the VA was considering any new contractual or other arrangements with FRHS. The CEO of FRHS (which also includes FRH) had been contacted by Stephen DiStasio just prior to the December 12 meeting, and was asked if Stephen DiStasio could mention the FRHS name in the context of working together. At no time were the soon-to-be-made-public details of the VA proposal shared with the CEO—or how the plan could involve FRHS; and, since FRHS already had a relationship with the VA through contracts for ultrasound, radiology, and endoscopy services, the CEO gave approval. The first time the FRHS board members were made aware that their

hospital was being considered as an option in the VA's proposal was at the December 12 meetings.

The first meeting with FRHS board members and local VA leadership was on December 21, 2011. A second meeting was held on February 22, 2012. Board members who attended these meetings relate that Stephen DiStasio made several vague suggestions, but offered no details on what relationship VA is seeking with FRHS. No business proposal has been received from the VA, nor have specific questions been presented regarding what services should be requested, offered, provided, etc. Those FRHS board members who were present at both meetings indicate that language used by HSVA leadership remained very vague during the second meeting, with no new information or inquiries presented by the VA, despite the fact that the VA Director had requested the follow-up gathering.

Individuals who have attended town hall meetings in other communities report that Stephen DiStasio has specifically mentioned building a new wing, presumably for a Community-Based Outpatient Clinic (CBOC), at FRH for veterans care, yet the FRHS board has never responded to this suggestion in either of its discussions with Stephen DiStasio and feels that it is very unlikely that such a proposal is feasible.

(Of note is that in Canandaigua, NY, where similar downsizing was proposed, the VA Director promised to build a $10-12 million wing on the local hospital. This was never built.)

In summary, the contents of the proposal presented by the local VA and VISN leadership on December 12, 2011 came as a surprise to the board of directors of Fall River Health Services who, despite the fact that the VA chose to publicly suggest some type of collaboration with FRHS, had no prior knowledge of such a plan. To date, any suggestions or proposals made directly by the VA to FRHS have been very vague, at best—lacking any detail or sense of a business plan. Despite The VA Director's public mention of "building a wing" or "co-locating" at FRH, the FRHS board has never publicly or privately encouraged or responded, feeling, rather, that it is very unlikely that such an idea is feasible.

Discussion of general differences between veteran care in a private hospital, such as Fall River Hospital (FRH), and care provided by a VA facility, including discussion of unique challenges confronting veterans and those providing their care, is as follows:

The committee has discussed the unique aspects of veterans' health care. Service-connected combat and non-combat injuries are a significant part of caring for veterans. The veteran population suffers from mental health issues such as Post Traumatic Stress Disorder (PTSD) at a much higher rate than the general population. The veteran population includes Native American veterans and others who have a significant amount of co-morbid illnesses. There are often multiple medical problems to deal with in veterans who do not have a local support system. Veterans seek detoxification and long-term help for alcohol and substance abuse, and these issues compound their medical and psychological problems. Disability, pension and other veterans' benefits are administered through a complex system that requires assistance from VA

social workers and other VA employees, as well as veteran service officers. In-depth knowledge of presumptive service-connected conditions and other regulations is needed to ensure that veterans receive the full spectrum of benefits that they have earned.

In summary, health issues of veterans are often complex and unique when compared to the general population. Typically, non-VA medical personnel, including physicians and other professional staff, lack the knowledge, training, and experience needed to navigate the VA bureaucracy and its regulations. Without this knowledge, veterans do not receive all the benefits they have earned, nor the specific health care they deserve.

Comparison of services provided at FRHS and the HSVA is as follows:

Medicare and Title 19 recipients comprise the vast majority of FRH inpatient and swing-bed patients. The FRH emergency room is staffed 24/7 by a physician. The FRHS rural outpatient clinic utilizes two family physicians, and one nurse practitioner; and visiting consultants/providers deliver scheduled clinic care in the specialty areas of cardiology, general surgery, neurology, orthopedics, and podiatry. Scheduled outpatient endoscopic procedures and surgeries are provided by specialists in general surgery, ophthalmology, orthopedics, and podiatry. Fall River Health Services employs two full-time pharmacists, one of whom has a Pharm.D, as well as two pharmacy technicians, but specific clinics that manage anticoagulation therapy, lipid control treatment, and diabetes control are not provided. The FRHS rehabilitation department consists of one part-time contract occupational therapist (OT), two full-time physical therapists (PT), one full-time PT assistant, two part-time contract PTs, one part-time contract PT assistant, and one part-time contract speech and language pathologist (SLP)/therapist. A full-time director and assistant provide activities. Full-time food services are provided on-site, with a part-time contract registered dietitian. One full-time and two part-time therapists, with occasional callback coverage, deliver daytime respiratory therapy. The staff of FRHS offers on-site sleep studies, cardiac rehabilitation, and pulmonary rehabilitation. The laboratory at FRHS employs one full-time phlebotomist and five full/part-time technicians who provide 24/7 availability. Three full-time radiologic technologists are available 24/7 to provide radiology services, including radiographic and computed tomographic (CT) studies. Fluoroscopy and nuclear medicine are not available. The imaging department employs one full-time daytime ultrasound technologist, with regular screening mammography and once-weekly magnetic resonance imaging (MRI) scheduled on-site by contract. No mental health services are offered. Social work services are provided on an as-needed basis, under contract. There is no medical library. Security and fire protection at FRHS are provided by local public law enforcement and volunteer fire fighters.

Services at the VA include mental health services at the Domiciliary (Dom), provided by two full-time psychiatrists, two psychologists and a mid-level provider. There is also a psychologist assigned to Primary Care.

The VA's Primary Care section has two full-time physicians, and two full-time mid-level providers. Outpatient care also includes a full time optometrist and podiatrist, and an

audiologist two days a week. Although the pharmacy department is ordinarily staffed with sufficient numbers of pharmacy technicians and pharmacists (including some holding a Pharm.D), the service is now short several staff, largely because VA management has chosen not to fill vital vacancies. Pharmacists provide consultation services for inpatient and outpatient care, including specialized clinics that manage anticoagulation therapy, lipid control treatment, and diabetes control. The nutrition and food service staff provides inpatient and outpatient consultation. A neurologist provides outpatient services periodically, as does a nephrologist. The VA has a full-time PT/OT department, periodic coverage by SLPs, full-time dental services and a full-time prosthetics department. The respiratory therapy department has 24/7 availability for inpatients and outpatients, performs sleep studies and manages home oxygen and CPAP set-up and follow-up. Social work services are provided for inpatients, outpatients and Dom patients. Orthopedics, general surgery, ENT, and urology specialties hold regular but not full-time clinics.

The VA also houses a full time dialysis unit, and a busy Compensation and Pension evaluation service, and provides Environmental Agent Registry examinations. Cardiac rehabilitation services, a medical library, and a staff education service are also provided. The VA police force provides 24/7 security and firefighters man the fully equipped on-site fire station round-the-clock.

Diagnostic services include lab and radiology with 24/7 availability, a nuclear medicine department, and CT and MRI scanners on a rotating basis. Patients are generally sent to Fort Meade or Rapid City for ultrasound studies, but contracts are also in place with FRHS for some ultrasound and radiology services. Echocardiograms are available on-site one day a week.

Surgical services at the Hot Springs VA have been severely decreased over the years by VA management, despite protests from veterans and staff. The only surgical service now available at HSVA is cataract surgery, with a consulting ophthalmologist also performing outpatient procedures twice a month. While most surgery and endoscopies are performed at the Fort Meade VA, endoscopy also can be provided, under contract, at FRHS. Still other, usually more complex, operative procedures are referred to tertiary facilities.

Urgent Care daily handles up to 25 patients during business hours, from walk-in patients with routine needs to all types of emergencies. It is staffed 24/7 by registered nurses and an in-house physician.

The Dom houses a call center that receives and directs calls to all of the VA's three campuses. Dom programs include 28-day alcohol treatment, a 6-week PTSD program, Compensated Work Therapy programs and substance abuse after-care, as well as a busy outpatient psychiatry and counseling service. Services tailored to veterans include an OEF/OIF/OND (Operation Enduring Freedom/Operation Iraqi Freedom/Operation New Dawn) case management program. There is a suicide prevention program, a Home-Based Primary Care program, as well as Chronic Disease Management. The Domiciliary Committee's report should be reviewed for a full description of Dom programs. The following description of inpatient services at the VA is from a staff

physician: As for the inpatient services, we have an inpatient unit that now is limited to 10 beds. Along with that is our CLC (Community Living Center), which is the equivalent of a 7-bed swing-bed unit. The census in the inpatient unit varies anywhere from 3-10 patients daily and, at times, possibly more when we are on diversion. The same nursing (as well as physician) staff provides care for the CLC beds, and that census is usually between 3-7 patients. After the CARES (Capital Asset Realignment for Enhanced Services) commission met in 2003 we were given the status of a rural access hospital, which is the same as a critical access hospital in the private world. We do not have an ICU per se, but many of the patients we care for have conditions similar to those provided in an ICU. We do have telemetry. We are unable to treat conditions that require long-term drips, but some things like short-term diltiazem, nitroglycerin, insulin, etc. can be used. Most of these patients are transferred either to Fort Meade ICU or to Rapid City Regional Hospital (RCRH) if longer-term treatment is needed. We have a lot of alcohol and substance abuse patients that make up the majority of patients. For sicker or more acute patients our job is to stabilize and transfer. We can do thrombolytic or other life saving measures in Urgent Care. We can intubate and do short term ventilator support, but all ventilated patients have to be shipped to RCRH. We have the capacity to admit patients with chest pain to exclude myocardial infarction, but if there is any evidence of such the patients are shipped out immediately. We see a lot of chronic obstructive pulmonary disease (COPD) and exacerbations, as well as pneumonias and other respiratory problems. We see a lot of diabetes-related illnesses including open wounds and cellulitis. We can and do adjust cardiac medications as long as management can be provided with oral medications. Our physicians and staff have the ability to provide more advanced care if administration would give us the support we need. At Hot Springs we have an Urgent Care instead of an Emergency Room (ER), but we provide the same type of care as the Fort Meade VA ER. Since we do not have surgery back up, we are not designated as an ER. Respiratory therapy is in the hospital 16 hours daily, but can be called back if needed. We also can do nuclear stress tests on cardiac patients and on patients suspected of such. We are able to medically treat such things as abdominal infections, like diverticulitis, but nothing surgical. We have a very active referral case manager as well as dietary support and social work service.

In summary, the following are vital services that FRHS does not provide: mental health services (including suicide prevention program), pharmacy consultation services, prosthetics, audiology, optometry, fluoroscopy, nuclear medicine (including nuclear stress testing), nephrology, urology, ENT, full-time podiatry, dentistry, routine alcohol and drug detoxification, on-site social work services, dialysis, chronic disease management, and home-based primary care program. Additionally, FRHS has no medical library or on-site security service or fire station. It is also quite likely that other small community hospitals that the VA would be “purchasing care” from would not have these services available to veterans.

Discussion of charges for inpatient care at FRH is as follows:

Fall River Hospital is a Critical Access Hospital (CAH), as certified by the federal government. Critical Access Hospitals are in rural areas and provide essential services to their communities, operating under certain stipulations regarding length of stay, number of beds, distance from

tertiary hospitals, etc. The CAH program is designed to improve rural health care access and reduce hospital closures. A cost-based system is used, which is calculated by figuring all expenses needed to care for the patient. The hospital is then reimbursed based on that figure. To date, however, the VA has presented no reimbursement proposals, cost analysis, needs assessments, or business plan to the board of directors of FRHS, so no comparison of probable costs/charges and proposed reimbursement has been possible.

In summary, Fall River Hospital is a federally certified Critical Access Hospital and, as such, utilizes charges predicated on a cost-based system. To date, the board of directors of Fall River Health Services has received no reimbursement proposals, cost analysis, needs assessments, or business plan from the VA that would permit initiation of contract negotiations for delivery of inpatient care to veterans at Fall River Hospital.

Results of research of various VA hospitals, clinics, or programs that have been closed or downsized or targeted for same are as follows:

Members of this committee have been interested in the experience of other private hospitals and clinics that have had contracts with the VA. We contacted personnel from these VAs and private facilities. Committee members also serving on the FRHS board have provided additional relevant information regarding local relationships.

In Grand Island, NE, the VA closed their ICU and hospital, and contracted with St. Francis Hospital, a private hospital. After two years, VA (which is managed by the same VISN as HSVA) ended the contract because it was too expensive. There was no alternative provided to the veterans, so those veterans needing VA inpatient services are now typically transferred to the Omaha VA, 155 miles from Grand Island. If a veteran is medically unstable and presents at St. Francis, he is transferred to the Omaha VA as soon as he is stabilized.

At Miles City, MT, the VA closed their hospital and again arranged a contract with a private hospital. This contract was broken and inpatient care for veterans is now provided 380 miles away at Helena, MT VA. The only remaining services at Miles City are a VA CBOC that is staffed with one physician and a part-time nurse practitioner. Any specialty care requires the veteran to travel to the Helena VA, which is eight hours away.
We have been told by contacts at both Grand Island and Miles City that veterans feel like "second class citizens" at the private hospitals. Also of note is that even if a veteran has Medicare, once he enters the private hospital as a VA patient, he cannot stay at the private hospital under Medicare, but must follow the VA requirement that he be transferred to the nearest VA hospital when stable.

As previously mentioned, it has been learned that in Canandaigua, NY, where similar downsizing was proposed, the VA Director promised to build a $10-12 million wing on the local hospital. This was never built.

It has been learned that a VA fee-for-service contract (negotiated through the Fargo, ND VA) with a private clinic in Williston, ND (again, managed by the same VISN as HSVA) was not renewed after its initial two to three years. This happened despite improvements that were made by the clinic, including acquisition of more clinic space and additional personnel by the private facility. Without any warning or without giving the private clinic an opportunity to re-bid, the VA failed to renew the contract and, instead, awarded a new (capitated) contract to a company from the east coast. The same scenario (i.e. sudden, unexpected loss of contract) also occurred in Dickinson, ND, after the private clinic had maintained the original contract for approximately five years.

Additionally, fee-based contracts were in place in Williston, ND, in order to provide various types of local specialized services (i.e. eye care, imaging, etc.). However, when fee-based funds ran low, contracts were canceled and patient appointments were arranged at the Fargo VA, requiring the patients to drive approximately 800 round-trip miles for the necessary procedures or care.

Also of note is that the VA operated a CBOC in Alliance, NE, staffed two days a month by HSVA employees who traveled to the clinic. This clinic was closed, with staff being told the VA could not find a suitable building, and others being told there weren't enough veterans to keep the clinic operational. Veterans now must travel to Scottsbluff, NE, 53 miles away, to see a VA contract provider there. Specialty care is not provided at Scottsbluff, however, and a veteran must go to Fort Meade, Minneapolis, or Omaha VAs, depending on the care needed.

Local VA leadership has repeatedly stated that the HSVA is unable to recruit and/or retain qualified physicians because either the physicians or their spouses do not wish to live in the Hot Springs area. Fall River Health Services board members point out that—without solicitation—FRHS has hired physicians who voluntarily left the HSVA and who have continued to live in Hot Springs. It is well known that other qualified physicians—including specialists—intentionally have either been released or not hired by the VA, despite the fact that they already live in Hot Springs or expressed willingness to do so.

Furthermore, Stephen DiStasio stated in the VA/FRHS meeting of December 21 that VA management wished it could provide additional orthopedic services locally. Although the VA was informed in that meeting that veterans could, indeed, receive orthopedic services at FRHS, Stephen DiStasio has made no effort to initiate such care for his veterans.

In summary, then, the initiation, termination, and longevity of contracts involving CBOC and hospital care and personnel are quite unpredictable, without apparent regard for veterans' needs, and totally at the discretion of the VA.

Comments and suggestions of committee members are as follows:

From our research with other VAs that have downsized or closed hospital services, we have learned that there are many problems with private hospitals or clinics contracting with the VA

to provide inpatient or outpatient care for veterans. The hospitals are reimbursed at Medicare rates, which is too low a rate for FRH to provide care to veterans. The VA has not maintained the contracts long term, and once the contracts are gone the veteran must travel on his own or be transferred to a VA that is an even greater distance away. Veterans feel like second-class citizens. Outpatient specialty care is not provided at the CBOCs so the veteran must travel farther for these services. This is already seen at HS, where veterans often have to travel to Rapid City or Fort Meade VA for procedures or services that were previously provided at HSVA. Given that veterans from Nebraska have already traveled an hour or more to HS, traveling further for specialty care is very burdensome and may also entail the need for overnight lodging, particularly during the winter months.

Also of note is that if the VA plans to provide care closer to the veteran's home, they would need to negotiate contracts or payment arrangements with hospitals and clinics in each city/town of the service area. We do not believe the VA has even attempted to initiate such contracts. This is certainly true locally.

In summary, it is evident that the promises that VA makes when they initiate downsizing or closure are not fulfilled, resulting in the veterans feeling like second-class citizens. The VA has a history of ending clinic and hospital contracts, without providing local alternatives. In the end, the veteran is left with fewer services being available nearby, and he must travel longer distances to obtain care. Routine admission of veterans to FRH for inpatient services does not appear to be a viable option financially or logistically. The scope of services currently provided veterans hospitalized at the HSVA would not be available at FRH. Veterans prefer care at VA hospitals and clinics. This has been obvious to anyone who has attended any of the community meetings that the VA has held. Health care for veterans is unique, and contract care solely from the private sector is not adequate to meet these needs.

Appendix B: Residential Rehabilitation Treatment Program (RRTP) Physical Plant White Paper

History of the Hot Springs Facility

The community of Hot Springs was chosen as home for the Battle Mountain Sanitarium because of the great care that residents at the State Soldiers Home were receiving, the healing waters, and the supportive community members. Today, more than a hundred years later, these factors remain. We intend to show through this white paper that the Residential Rehabilitation Treatment Program (RRTP) of the VA Black Hills Health Care System should remain in Hot Springs.

The Battle Mountain Sanitarium was completed in 1907 to maximize all elements of successful veteran rehabilitation. Architect Thomas Rogers Kimball designed the Spanish Mission style Domiciliary with a unique approach to hospital layout. By using a ship's wheel design, or radial plan, Kimball produced a building that gave several possible kinds of orientation for the wards. The arrangement was such that each section had one covered porch side, while the other side was purposely exposed to the sun. The orientation also allowed a great amount of fresh air to circulate through and around the wards. The inner courtyard was a gathering place for veterans with a fountain and gardens. Windows surrounding the courtyard brought the outdoors inside.

Kimball's design incorporated ramps instead of stairs wherever patients were able to go, making it easily accessible for disabled patients. By locating the ramps at connecting links between wards, no space was wasted. In addition, a circular pedestrian walkway connected all sections of the building which provided a shady and cool walkway in the summer and a dry and warm area in the winter.

Government Supervising Architect, James Knox Taylor, praised Kimball's design by calling it "a gem, one of the finest conceptions for a hospital I ever saw." In 1909, Kimball was appointed by President Theodore Roosevelt as a member of the first Commission for Fine Arts.

Fast forward to December 12, 2011, when then Acting Director Mr. Steven DiStasio presented a proposal to abandon the facilities currently on the VA campus. Some of his reasons were that the Hot Springs VA RRTP:

- Was not compliant with the Americans with Disabilities Act (ADA)
- Did not have elevators to assist with handicap access
- Had ramps steeper than mandated for ADA access
- Did not have bathrooms accessible to wheelchairs
- Presented problems for the delivery of high-quality care due to building design and age.

Instead, Mr. Steven DiStasio, BHHCS Medical Center Director, has proposed that a new, state-of-the-art facility should be built in Rapid City. He claims this relocation would allow for services to homeless veterans, women veterans, and single veterans with children. DiStasio also

believed this would provide more post-treatment job opportunities and maximum recovery emphasizing independence and health.

The statements presented in Mr. DiStasio's proposal are inaccurate, and we do not agree with his conclusions that a new $37 million facility in Rapid City is necessary to provide for the elements in his plan.

First, the RRTP has met Americans with Disabilities Act requirements since the late 1970s. The RRTP has two elevators at each end and in 2011 added another elevator in Ward 4. Also completed in 2011 was the modification of the ramp from the lower arcade to Ward 4B to meet ADA requirements. Ward 4B was intended to be remodeled to meet ADA requirements for rooms and bathrooms but the project was halted prior to Mr. DiStasio's announcement.

However, there are handicap accessible bathrooms in other parts of the RRTP already. It is important to note that because the Hot Springs VA was named a National Historic Landmark in 2011, it does not need to meet all VA standards for new construction but rather must show it has made reasonable accommodation toward the standards.

Second, the present RRTP structure is solid and in the last few years has had new heating and air systems installed. We contend that the RRTP is safer than buildings that only have elevators and stairs for the evacuation of handicapped patients. In the event of a fire, elevators are not able to be used for evacuation, so handicapped patients need to be assisted or carried down the stairs. However, due to the brilliant architectural plans by Thomas Kimball, handicapped patients can easily be evacuated using the RRTP ramp system instead. Handicapped patients could actually evacuate themselves in a dire situation.

Third, we contend that remodeling the current RRTP will be more economical. Remodeling the current structures enhance recovery and health for veterans. The remainder of this paper will prove this without a doubt. Veterans themselves say that a rural environment is preferred over urban settings.

Rural environments provide the peace and quiet that many of these patients require for a full recovery. Urban environments, besides being chaotic and noisy, also provide many more temptations for those who are battling drug and alcohol addiction.

Finally, the VA campus has space for additional buildings. Women veterans already have their own newly remodeled ward in the RRTP. However, if the VA Administration insists that women should be housed separately, a new cottage-style structure that blends in with the historical design of the current buildings could be constructed. A similar structure for single veterans with children or veterans with families could also be constructed on campus for this purpose. There are several locations on the Hot Springs VA campus where this residential-type housing could be located. One possible location, which would need the approval of the Historic Preservation Council and would have to comply with infill preservation guidelines, is on the west side of Building 11 beyond the parking lot where the horseshoe pits are located (please refer to

campus map). There would even be enough room to add a playground there. Using the existing historic residences, such as Building 21 or 28 is another option. Other places on campus where land is available is on the far side of the main parking lot by the Police and Fire Station and at the north end of 6th Street. The street could be extended for several cottage style residential units and still remain on VA owned property.

Though the VA Administration has not released an architectural drawing of the proposed new RRTP in Rapid City, Mr. DiStasio has stated that it would house 100 veterans. We believe that by remodeling the current space in the RRTP to single and double rooms we could house 200 veterans. By adding the cottage-style structures for women and veterans with families, we could add to that total. With less money the RRTP could be remodeled AND offer MORE space for the care of veterans than that proposed in Rapid City. This supports our plan to expand services to veterans. It is our hope that the Hot Springs RRTP would become the premier PTSD program in the United States. We also believe that there are unique CWT opportunities available if we could become a training ground for veterans interested in Historic Preservation techniques. We also have a lovely greenhouse which is vacant and could be used for a horticulture program.

The suggestion to abandon the Hot Springs VA campus is tragic. The domiciliary in particular is a beautiful building with no structural defects. If vacated, the buildings on the Hot Springs VA campus will still have to be maintained to a high degree due to its National Historic Landmark status. If the property is going to have to be maintained anyway, it might as well be modernized and used for the reason it was constructed—serving veterans. Even if the cost to modernize the building costs twice as much as what we estimate, it would still be more cost effective than the plan to move the RRTP to Rapid City.

Projected Costs of VA Administration Proposal: New RRTP Complex in Rapid City	$37,400,000.00	
Activation money for furniture, computers, new equipment for new RRTP	$11,000,000.00	
New CBOC in Hot Springs with Dialysis	$15,000,000.00	
Activation money for furniture, computers, new equipment for new CBOC	$5,000,000.00	
Maintenance of abandoned Hot Springs VA Campus with National Historic Landmark status. Estimated costs include heat, maintenance of roads and grounds, security and building maintenance.	$2,500,000 per yr. x 25	$25,000,000.00
ESTIMATED TOTAL:	**$93,400,000.00**	

Projected Costs of Save the VA Proposal: Project	Estimate	Total
Architectural Design funding	$17,670,000.00 total project x 10%	$1,767,000.00
Complete remodel of B level ramps from lower arcade to B wards as has been done in Bldg. 4 already	$15-20,000 x 5 (Bldgs. 3, 5 – 8)	$100,000.00
Install 2, 3 or 4 stop elevators	$160-240,000 x 3 (Bldgs. 5, 7, 8)	$720,000.00
Remodel all wards for single and double occupancy rooms	$750,000 x 11 (3B and 5B are already remodeled which is why the number is 11 instead of 13)	$8,250,000.00
Tunnels between Bldg. 3 & 4 and Bldg. 6 & 7	$160,000 x 2 (Note the savings building tunnels is compared to installing elevators)	$320,000.00
Separate family, singles with children, and/or female housing all with handicap access	$50,000 per bed x 40	$2,000,000.00
Handicap parking between Bldgs. 3 & 4 and where the new housing is added	$10,000 per vehicle x 40	$400,000.00
Handicap ramps for west end of street level entrance Bldg. 7	$35,000 per ramp x 2	$70,000.00
Bridges to allow access to upper arcade and meet Historic Preservation guidelines	$250,000 x 2	$500,000.00
Green standard upgrades to provide better insulation and thermal windows (inside envelope) to meet Historic Preservation guidelines	$330,000 per bldg. x 11 (Bldgs. 1 – 11 = Entire Dom Complex)	$3,630,000.00
Green standard upgrades to update boilers for dual source fuel to add Liquid Natural Gas	$420,000 per boiler x 4	$1,680,000.00
ESTIMATED TOTAL	**$19,437,000.00**	

*Disclaimer: These figures are an estimated guess to the best of our ability.

THE BOTTOM LINE: VA ADMINISTRATION PROPOSAL	$93,400,000.00
SAVE THE VA PROPOSAL	$19,437,000.00

DIFFERENCE BETWEEN THE PROPOSALS:	$73,963,000.00

****Note**: This cost savings does not take in account the energy cost savings that would be gained with the installation of better insulation, thermal windows and Liquid Natural Gas. We believe that over the next 30 years the energy savings would be a minimum of $400,000.00 per year totaling a savings of $12,000,000.00.

Additional Concerns

1. The VA Administration claims the cost to maintain the buildings at Hot Springs is part of the reason a new RRTP is needed in Rapid City. Since 1996, VA management has made the decision to allot the maintenance, equipment and non-recurring maintenance funding for the VA Black Hills Health Care System (BHHCS) to be divided, on average, 40% to the Hot Springs campus and 60% to the Fort Meade campus. Using the numbers from the VA BHHCS 2010 Annual Report, the total for maintenance, equipment and non-recurring maintenance funding was 9.6 million dollars. Divided between the two campuses, Hot Springs received $3.84 million and Fort Meade $5.76 million. However, the average age of the patient care and support buildings are Hot Springs is about 100 years old and the average age of the patient care and support buildings at Fort Meade is about 35 years old. In addition, there is seven maintenance staff at Hot Springs compared to fourteen at Fort Meade.

In other words, even though the Hot Springs campus has much older buildings than Fort Meade, it has been maintained with an average of $2.3 million a year less and with fewer employees than the newer buildings at Fort Meade. Since 1996, the overall maintenance costs at Hot Springs have been $36.8 million less to maintain the old buildings at Hot Springs vs. the new buildings at Fort Meade.

The VA Administration justifies this inequity by basing their decision on the square footage of the campuses—800,000 sq. ft. at Fort Meade and 460,000 sq. ft. at Hot Springs. However, what they fail to take into account or acknowledge is that many of these buildings are leased, vacant or rented and should not be a part of the square footage calculation. Approximately 337,000 sq. ft. at Fort Meade and 35,000 sq. ft. at Hot Springs falls within this definition. If you subtract this square footage from each campus, the Fort Meade campus reduces to 463,000 sq. ft. and the Hot Springs campus to 425,000 sq. ft. Once again, the justification for a 40/60 split in the maintenance, equipment and non-recurring maintenance funding falls on its face and our request for an equal 50/50 split is even-handed.

By allotting funds unfairly, the VA Administration has caused maintenance at the Hot Springs campus to be deferred which has led them to say a new building is needed. We wholeheartedly disagree with this wasteful plan. By consolidating the size of what needs to be cared for at the Fort Meade campus, we estimate at least two million dollars could be saved in maintenance costs annually. It also would have no negative impact on the veterans we serve. The money saved could be used to modernize the RRTP complex at Hot Springs.

2. We want to mention here that Historic Preservation law and VA policy states that leasing out of historic buildings is to be done so that it does not take away from the agency's main mission of taking care of veterans. Leases are to be written to ensure the cost of maintenance, utilities, infrastructure, and preservation are covered. At the Fort Meade campus, there are buildings utilized by the National Guard, a Museum, and employees living in residences. Each of these occupants should be paying for the upkeep of these buildings, not the VA. However, in the case of the museum, there is no current lease in place at all. The most recent lease record available expired on October 10, 2000! In that lease the museum did not pay anything to use the museum but was expected to "maintain, restore and protect the leased premises." However, we know that $353,000.00 was spent by the VA to update the museum which included the purchase of new aluminum clad windows which do not meet Historic Preservation guidelines. Poor management of VA property has led to more taxpayer money being spent than is necessary when a properly executed lease with the National Guard (who has actually asked to buy the property they use), Museum and renters could solve this issue.

This leads us to another question: why has the VA Administration not supported the purchase by the National Guard of the property they use? The historic buildings on the Fort Meade campus are significant to the National Guard because it was a Calvary post. They are not significant to the Department of Veterans Affairs. We suggest the National Guard should be allowed to determine how best to preserve their own history.

3. The VA Administration has stated that it is too costly to modernize the Dom Complex which is 105 years old and claims the buildings are in poor condition. We find this an unsupported claim when we compare the requested funds for Hot Springs vs. those of the Fort Meade campus and the Rapid City campus. Each year the VA submits a Strategic Capital Investment Plan (SCIP) to Congress for approval.

Fort Meade SCIP Requests	
2012 SCIP: Approved construction and design of new surgery tower	$10,200,000.00
2013 SCIP: Wind Turbine generator	$1,900,000.00
Relocate SPD and Endoscopy	$8,500,000.00
Renovate Patient Wards	$7,200,000.00
Renovate Quarters & Outlying Bldgs. (which should be covered by lease money—see previous paragraph)	$500,000.00
Renovate Mental Health	$5,000,000.00
Renovate and expand CLC (Nursing Home)	$25,000,000.00
Relocate Dietetics	$9,300,000.00
ESTIMATED TOTAL:	**$67,600,000.00**
2013 Rapid City SCIP Requests	
New RRTP and New Multi-Specialty Outpatient Clinic	**$69,000,000.00**

Hot Springs Requests	
2013 SCIP: Renovate and upgrade clinic areas, bio-mass boiler, and building system controls	$9,270,000.00
Save the VA Proposal	$19,437,000.00
ESTIMATED TOTAL:	**$28,707,000.00**

From the charts above, it is obvious that the renovations to the historic Hot Springs RRTP and Hospital would be far less costly than those proposed to the fairly new buildings at Fort Meade. In fact, the difference is approximately 40 million dollars. **According to the VA Administration's SCIP report,** the 105-year-old Hot Springs campus needs only $9,270,000.00 in upgrades while the much younger buildings on the Fort Meade campus need $67,600,000.00 in upgrades. It would appear that the Fort Meade campus is actually the more costly campus to maintain.

It is shocking to see that Fort Meade will basically have a new facility just like in Rapid City—less than a 2 million dollar difference between the two proposals. How can the VA Administration justify this expense for facilities that are 30 miles apart and serve the same catchment area? While on the other hand, Hot Springs is 60 miles from Rapid City and 90 miles from Fort Meade and serves veterans from the Southern Hills, Indian Nation Reservations, Nebraska and Wyoming.

4. We contend that since the VA Administration is based at the Fort Meade campus and since Mr. Steven DiStasio has shown clear bias against Hot Springs, it makes it very difficult for them to look at this decision in an un-biased manner. The same can be said about this counter proposal, so, to be fair, we believe a non-biased panel should look at the facts and figures to assist in making a very critical decision. Sometimes, by slowing the process down, a more intelligent decision can be made. Rushing this important decision could result in a negative impact on all veterans involved, the American taxpayer, all employees of VA BHHCS, and the communities involved.

In conclusion, the Hot Springs RRTP is more than capable of being updated with reasonable cost to accommodate the present and future needs of all veterans. The RRTP will be able to meet ADA, privacy, security, and safety standards. The RRTP can add the social aspects that veterans are seeking by providing a newly remodeled recreation/workout area, library, and computer area.

By revitalizing the RRTP, the VA will show its commitment to quality veteran care, providing care where veterans are—many of them being rural, and its own Historic Preservation standards which advocate for using historic buildings. Remodeling the RRTP in its present serene environment will increase the quality of life for veterans, their families, VA employees and the community of Hot Springs.

It is hoped that the VA Administration would see the “gem” that is the Hot Springs VA with its unique architectural plan and sandstone buildings sitting high on a hill overlooking the city.

Most of all, we hope that the VA Administration would move forward with the Save the VA plan which is guided by these considerations, in this order:

- *What is best for Veterans
- *What is best for Taxpayers
- *What follows Federal Law
- *Impact on VA Employees
- *Impact on the Community.

The following represents the current RRTP layout and a proposed layout which would provide handicapped access and semi private and private rooms for all veterans for the estimated cost of **$19,437,000.00.**

Current RRTP Layout

Map Key: A = Upper level; B = Ground floor; C = Basement

Building #1

- 3rd Floor = Fiscal and Human Resources offices
- 2nd Floor = Mental Health and Community Affairs offices
- 1st Floor = Director's Office and RRTP Operations offices
- C = RRTP Clinic and RRTP Fileroom

Building #2

- A = SATP classrooms and offices
- B = Dining Room and Kitchen
- C = Quality Assurance
- Sub-basement = Housekeeping

Building #3

- A = Contracting offices
- B = Business Offices
- C = Voluntary Services offices

Building #4 Currently Empty but has an ADA accessible ramp to the B level plus an elevator

Building #5

- A = PTSD Living Quarters
- B = Women's Quarters
- C = Canteen

Building #6

- A = PTSD Living Quarters
- B = Recreation
- C = Warehouse

Building #7

- A = SATP Living Quarters
- B = IT/CWT Living Quarters
- C = Arts & Crafts

Building #8

- A = SATP Living Quarters
- B = SATP Living Quarters
- C = Mechanical Room and Storage

Building #9

- B = Protestant Chapel
- C = Storage

Building #10

- B = Catholic Chapel

- C = Electrical Shop and EMS Locker Room

Building #11

- A = Auditorium
- B = Call Center/Museum

Proposed RRTP Layout

Map Key: A = Upper level; B = Ground floor; C = Basement

Building #1

- 3rd = Fiscal and Human Resources offices
- 2nd = Mental Health and Community Affairs offices *Has an elevator already
- 1st = Director's Office and Dom Operations offices
- C = SATP Offices, RRTP Clinic and RRTP Fileroom

Building #2

- A = Remodel space for Contracting and Business offices
- B = Dining Room and Kitchen *Has an elevator already
- C = Quality Assurance
- Sub-basement = Housekeeping

Building #3

- A = PTSD Living Quarters and Offices
- B = Remodel offices into individual PTSD Living Quarters; remodel shower/bathroom
- C = Voluntary Services and PTSD Classrooms and Offices

Building #4

- A = PTSD Living Quarters and Offices *Has an elevator already
- B = PTSD Living Quarters, Classrooms and Offices
- C = PTSD Living Quarters, Classrooms and Offices

Building #5

- A = IT/CWT Living Quarters and Offices
- B = Women's Quarters, Section Office and Classrooms
- C = Canteen

Building #6

- A = IT/CWT Living Quarters and Offices
- B = Call Center
- C = Warehouse

Building #7

- A = SATP Living Quarters and Offices *Add an elevator
- B = SATP Living Quarters, Classrooms and Offices
- C = Arts & Crafts/Hobby Shop

Building #8

- A = SATP Living Quarters and Offices
- B = SATP Living Quarters, Classrooms and Offices
- C = Mechanical Room and Recreation

Building #9

- B = Protestant Chapel
- C = Storage

Building #10

- B = Catholic Chapel
- C = Electrical Shop and EMS Locker Room

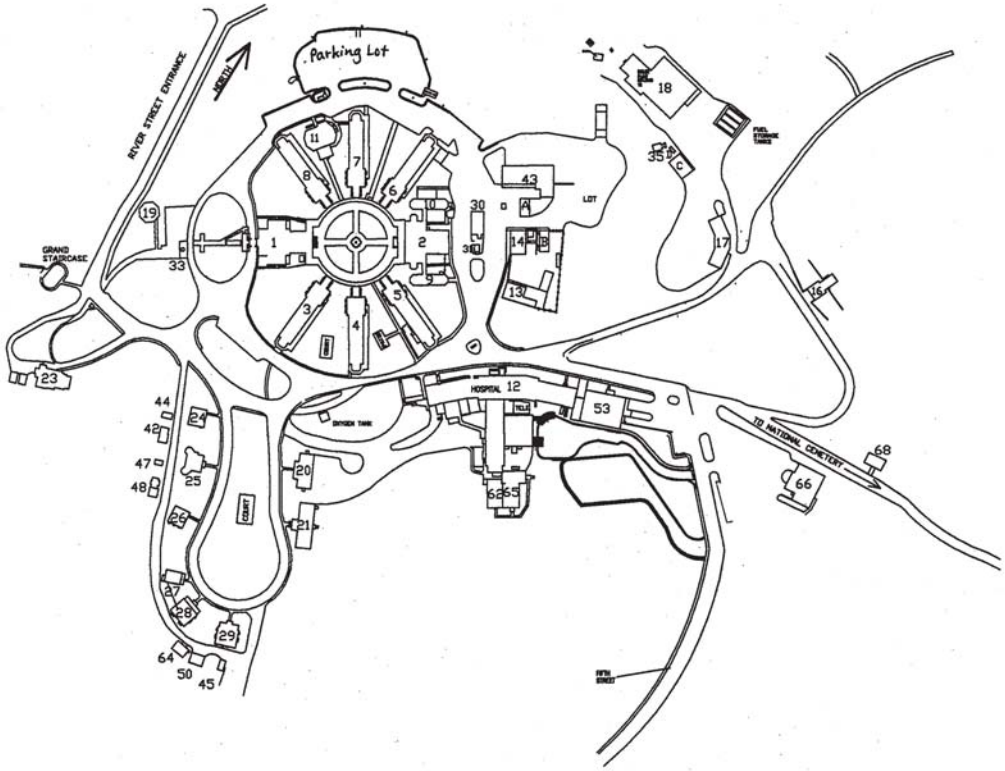
Building #11
A = Auditorium
B = Computer Area/Library

Additional Notes:
Since Building 8 basement was a storage area, a new storage area could be built by the boiler plant on VA grounds.

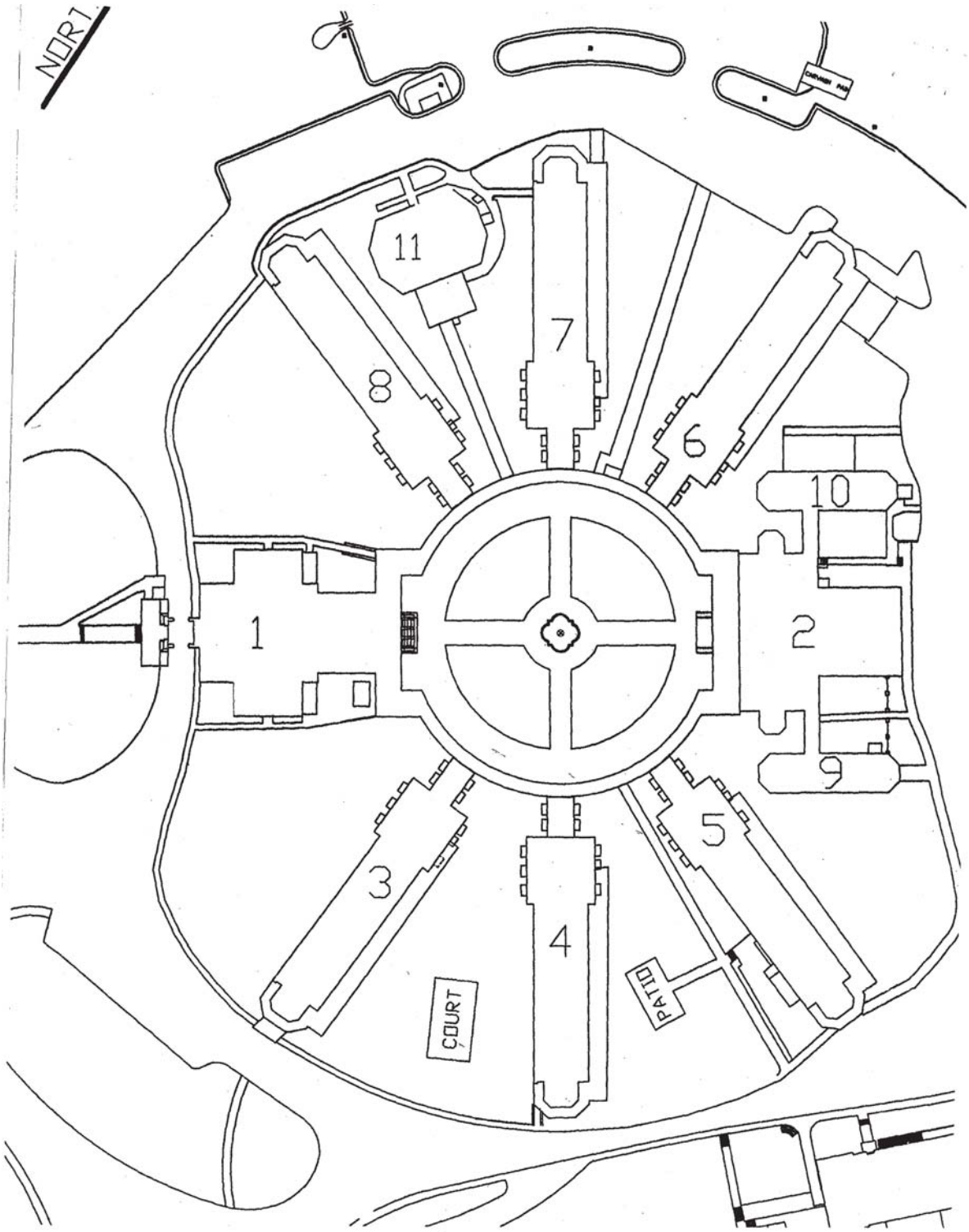
We are suggesting that the Director's House, Building 23, become the headquarters for the National Archives. The lower level could be turned into the museum and visitor's center. The upper levels could be turned into offices. There is enough land near the Director's House to add a building that has museum-quality heat and light controlled areas for preservation of special documents and historical items if needed.

Our plans include creating tunnels between Buildings 3 & 4 and from Buildings 6 & 7. The reasons for this are to allow handicap access and a secondary fire exit. Due to Building 4 having an elevator, the tunnel would allow Building 3 to also be handicap accessible. Similarly, if an elevator was installed in Building 7, the tunnel would make Building 6 handicap accessible as well.

We are not putting classrooms on any of the A wards so that handicap veterans do not need to access this level. This will save money because elevators will not need to be installed that come to the A wards and modifying the ramps to this level is not feasible.



VA BLACK HILLS HEALTHCARE SYSTEM
HOT SPRINGS, SD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Appendix C: Residential Rehabilitation Treatment Programming White Paper

The Residential Rehabilitation Treatment Program (RRTP) in Hot Springs is the primary entry point into a multifaceted mental health rehabilitation continuum of care. While many RRTP's are single focused programs, i.e., a 28 day Substance Abuse Program, the Hot Springs VA is full service RRTP. This is desirable to many veterans because they are able to address their needs in a comprehensive and holistic manner. Concurrent treatment for multiple mental health and chronic medical conditions is a cost effective method designed to meet the multiple needs of our most at risk veterans.

RRTP (Dom) Recent Clinical History

In 2004 the Hot Springs RRTP carried a patient census of 160 veterans. The facility provided five core treatment components which included: 28 day Substance Abuse Program; 45-60 day After Care Program; 90-120 day Compensated Work Therapy Program; Medical/Psych/Long Term Care; and PTSD. Additionally there was an Assessment Team. There were also two full time Chaplains.

The Programs of Substance Abuse, After Care and CWT/IT were managed by three multidisciplinary teams composed of the following disciplines: Psychology, Nursing, Social Worker (MSW), Addiction Therapist, Vocational Rehabilitation Specialist and Psychiatrist or Psychiatric Nurse Practitioner.

Since that time, the programs have been slowly and systematically eroded by staff reductions. Loss of positions resulted in programs being eliminated or collapsed into other teams. With the reduction of staff came the mandatory reduction in beds. What once was a thriving multi-state residential program has been reduced to 60 patients.

Veterans seeking admission into the program have reported wait times of several weeks to several months. Instead of speaking with a qualified staff member, phone calls for admission are now answered by a phone bank. The veterans, who are often homeless and without normal resources are expected to wait for a return phone call. These system created delays have resulted in the low census and the loss of several major referral sources.

Veteran length of stay has been reduced to 90 days. Reduction of the LOS is not supported by the current Allocation Resource Methodology which reimburses at a higher complex rate for homeless veterans who are served in a residential homeless program for 180 days. Instead,

many veterans are discharged to the Cornerstone Mission in Rapid City, in spite of open beds and resources to provide rehabilitation services to them in Hot Springs.

It is the conclusion of the Save the VA group that the systematic reduction in services to our most needy veterans; the homeless, the Substance Abusers, and the Veterans with PTSD must be stopped. A reconstruction programming to include an appropriate level of staffing and services is clearly indicated.

Urban Versus Rural Residential Rehabilitation

The Rapid City area does not represent the majority demographic of the RRTP in Hot Springs. According to VHA data system, 9% of veterans using the RRTP are from the Rapid City area. Data reflects that 91% of the RRTP veterans of the Hot Springs RRTP are NOT from the Rapid City area, and do NOT relocate in Rapid City on discharge but return to their home area.

A cornerstone in the proposal to move the RRTP to Rapid City is the stated improvement in vocational opportunities in Rapid City. The proposal cited improved educational opportunities, improved vocational opportunities, improved transportation and improved schools for dependents in Rapid City.

However, it is critical to understand that access to both vocational and educational opportunities are *currently available to veterans who chose to locate to Rapid City*. **In fact there is a plethora of VA homeless and vocational services in Rapid City.** These include an outpatient Substance Abuse Program, VHA vocational specialists, a supported employment program, MHICM program, a Grant and Per Diem facility at the Cornerstone Mission and two Transitional Residences in Rapid City and Sturgis. The HUD-VASH program provides housing vouchers for veterans in need of housing in Rapid City. The current needs of the homeless veterans in the Rapid City are being met by current resources. If additional resources are needed in Rapid City to provide access to Educational and Vocational opportunities, they can be obtained in a more economical way than moving an entire health care facility.

According to the Journal of Rural Health, 26 (2010); "Only half of the highly rural Veteran enrollees live within an hour of Primary Care, and 70% must travel more than 2 hours to acute care or 4 hours to tertiary care."

Hot Springs RRTP, Inpatient and Outpatient facility serve a highly rural population as designated by the Office of Rural Health. Veterans from the Hot Springs' highly rural catchment area currently required to drive up to 400 miles to Ft. Meade to obtain routine ultrasound tests, endoscopic examinations, specialty services, and same day surgery. All of these services were previously provided in Hot Springs before the services were systematically dismantled.

All of the counties served by the VA in Hot Springs are considered Health Provider Shortage Areas. This includes the counties of Fall River, Custer, Shannon, Todd, Bennett, Jackson, and Mellette in South Dakota; Sioux, Dawes, Sheridan, Grant, Cherry, Box Butte, Morrill in Nebraska; Niobrara, Weston and Crook in Wyoming.

Crime and Veterans Safety – Urban versus Rural Community

Veterans, especially female veterans express their feeling of safety in Hot Springs, where they can walk down town safety. Female veterans have experienced assault in Rapid City and find the safety of Hot Springs conducive to healing. The crime index between Rapid City and Hot Springs supports this feeling of safety.

Year	Location		Murder	Rape	Robbery	Assault	Burglary	Thefts	Vehicle Thefts	Arson	Crime Index
2009	Hot Springs, SD	Count	0	0	0	5	9	24	2	0	
	Hot Springs, SD	Per 100,000	0	0	0	124.5	224.2	597.8	49.8	0	411
	South Dakota	Per 100,000	2.6	54.8	13.7	114.6	305.2	1,314.20	100.1	NA	979

Rapid City, SD
Crime by Year

Year	City		Murder	Rape	Robberies	Assaults	Burglaries	Thefts	Vehicle Thefts	Arson	Crime Index
2009	Rapid City, SD	Count	2	97	41	167	433	2,264	132	21	
	Rapid City, SD	Per 100,000	3	146.6	62	252.4	654.4	3,421.50	199.5	31.7	2,408
	South Dakota	Per 100,000	2.6	54.8	13.7	114.6	305.2	1,314.20	100.1	NA	979

Hot Springs RRTP (DOM) Rural Rehabilitation Entry Point

The RRTP in Hot Springs is a primary entry point into a multifaceted mental health rehabilitation continuum of care. Unlike many of the newer single purpose RRTP's, the services in Hot Springs provide a multi-phase approach by offering patient centered programming that meets the

specific needs of the veteran. These services currently include Substance Abuse Treatment, Compensated Work Therapy, Incentive Therapy, and PTSD treatment. Additionally, the Hot Springs RRTP supports two transitional houses, one on the Pine Ridge Reservation and one located on the Hot Springs Campus. In the recent past, the continuum included a Residential After-Care Program and a Medical/Coping Skills Program. These last two programs were eliminated due to an incremental cutback in staffing.

Unlike the Inpatient, Outpatient and Nursing Home Services, the Hot Springs RRTP enjoys a catchment area that extends well beyond the current geographical boundaries of the Black Hills Health Care System. It's longer-term, specialized services draw veterans primarily from the five state areas of Wyoming, Montana, Nebraska, Colorado, South Dakota and North Dakota. With homelessness and alcoholism so prevalent on Indian Reservations, this facility provides a needed service to Native American Veterans. Hot Springs is a major resource for Native Americans from Wyoming, Montana and the seven reservations in North and South Dakota. Admission demographics show that veterans from every state in the United States are drawn to the unique location and the specialized programming

In 2011 veterans entering the majority of RRTP admissions came from the following states: Colorado, Montana, Nebraska, and Wyoming. Veterans come from as far east as Pennsylvania and as far west as Washington State. Veterans from South Dakota accounted for 50% of the total admissions.

Special Emphasis Populations served by the VA Hot Springs RRTP

The RRTP serves several populations which are considered Special Emphasis in the Veterans Health Administration. These special emphasis populations are:

Homeless Veterans:

- *23% of the homeless population are veterans*
  33% of the male homeless population are veterans
  47% served Vietnam-era
  33% were stationed in war zone
  76% experience alcohol, drug or mental health problems
- *On a single night in January 2009, the states with the highest estimated share of veterans among their total homeless populations were Kansas (34%),* ***North Dakota (22%), South Dakota (23%)*** *and* ***Wyoming (22%).*** *In these same states, veterans make up a relatively small share of the total population (8, 8, 10 and 9) percent respectively.*

Homeless is a result – not a diagnosis. Providing a veteran a bed will not end homelessness. To end homeless one must address and conquer the reasons for becoming homeless. Veterans must be given the opportunity to "stand down". They must be given the opportunity, time, and resources to heal their soul, to regain their health with nutrition, medical, mental health and dental care, to remain drug and alcohol free, to be a part of a healing community, and to learn the skills needed to live on his/her own. This does not happen in 28 days. The Hot Springs RRTP meets the multiple complex needs of our homeless veterans.

Native American Veterans:

The access to residential rehabilitation and Inpatient/Nursing Home Care is particularly important to the Native American Veteran Population.

The 2010 Census data (State and County Quick Facts) shows that Shannon and Todd Counties, home to the Oglala Lakota and Rosebud Tribes are two of the three poorest counties in the United States.

- Shannon County – Persons below the poverty line, 2006-2010 – 53.3%
- Todd County – Persons below the poverty line, 2006-2010 – 48.8%
- Pennington County (Rapid City), 2006-2010 – 14%
- Meade County (Sturgis, Ft. Meade), 2006-2010 – 10%
- South Dakota – Persons below the poverty line, 2006-2010 – 13.7%

Compared to veterans in general, a higher proportion of Native Americans veterans served in later periods – Gulf War, Peace Time between Viet Nam and the Gulf War, and in Viet Nam. The Native American Veteran population is younger than "all races" due to their increasing military numbers in recent years. The Native American Veteran population is decreasing at a slower rate than "all races". From 2005 to 2020, it is estimated that the Native American veteran population will decrease at a rate of 7% compared to a decrease of 26% of the overall veteran population.

The 2010 Census data (State and County Quick Facts) shows that Shannon and Todd Counties, home to the Oglala Lakota and Rosebud Tribes are two of the three poorest counties in the United States.

- Shannon County – Persons below the poverty line, 2006-2010 – 53.3%
- Todd County – Persons below the poverty line, 2006-2010 – 48.8%

Native American Health Care Disparities -- Indian Health Service Fact Sheets (www.IHS.gov)

American Indians and Alaska Natives die at higher rates than other Americans. (The following rates are adjusted for misreporting on Indian race or state death certificates, 2004-2006 rates)

Tuberculosis (500% higher); Alcoholism (514% higher); Diabetes (177% higher); Unintentional Injuries (140% higher); Homicide 92% higher); Suicide (82% higher)

Rural and highly rural Native Americans are drawn to the rural nature of the RRTP in Hot Springs. The facility operates the first sweat lodge ever established on VA grounds. The beauty and peaceful surroundings in Hot Springs are welcoming to the Native American. Moving this facility to an urban area is not in the best interests of our Native American veterans. Travel will be longer, families will be further away, and there will be more negatives influences in Rapid City as evidenced by the high crime rate and number of liquor establishments.

Post Traumatic Stress Disorder:

Viet Nam - Among Vietnam veterans, approximately 15% of men and 9% of women were found to have PTSD at the time of the study. Approximately 30% of men and 27% of women had PTSD at some point in their life following Vietnam.

Persian Gulf War - *Studies examining the mental health of Persian Gulf War veterans have found that rates of PTSD stemming from the war range anywhere from almost 9% to approximately 24%. These rates are higher than what has been found among veterans not deployed to the Persian Gulf.*

Iraq War and Afghanistan - *The conflicts in Iraq and Afghanistan are ongoing. That's why the full the impact the war has had on the mental health of soldiers in Iraq in not yet known. One study looked at members of four United States combat infantry units (3 Army and 1 Marine) who had served in Iraq and Afghanistan. The majority of soldiers were exposed to some kind of traumatic, combat-related situations, such as being attacked or ambushed (92%), seeking dead bodies (94.5%), being shot at (95%), and/or knowing someone who was seriously injured or killed (86.5%). After deployment, approximately 12.5% had PTSD, a rate greater than that found among these soldiers before deployment.*

The Hot Springs RRTP PTSD Component is considered one of the top PTSD Programs in the Nation. Veterans seek treatment in Hot Springs not only because of the programming but as importantly, because of the feeling of safety and security found in the small town and on the campus itself.

PTSD is a condition of anxiety and the quest for feeling safe. Failing to use this historic site for mending the wounds of war – as it has done for Spanish American, WWI, WWII, Peacetime, Korean, Viet Nam, and now Gulf War and OEF/OIF veterans is to ignore two aspects of "psychosocial rehab" that of healing the spirit and the mind. This facility provides a basic requirement healing – safety.

To a number, the veterans speak of the quiet and serene atmosphere in the Hot Springs RRTP. They note the lack of city noise, the lack of air traffic, the lack of horns and sirens. They enjoy the comfort of the surroundings, including "Battle Mountain", the mountain overlooking the facility where the Cheyenne and the Lakota Indians fought for the right to winter in Hot Springs.

Veterans speak of the nearness of nature, the ease of taking a walk, sitting quietly and most of all Healing. They heal in this atmosphere, just as the thousands of veterans who came before them healed. Whether physical, emotional or spiritual, the veterans who come to Hot Springs are healed.

If one believes in the spirit, one must believe in the spiritual remnants of the thousands of veterans healed in these buildings. The stones have absorbed their voices and their footsteps. Their presence is there for those who wish to tap into their strength. It is in fact a spiritual place – one that only time and souls can create. This centuries old spirituality cannot be replaced with new apartments in an urban area.

<u>Rural and Highly Rural Veterans</u>

Rural Veterans Health Care Disparities:

- "About 3.3 million Veterans (about 41% of total) enrolled in the VA Health Care System live in rural or highly rural areas of the country.
- Men and women Veterans from geographically rural areas make up a disproportionate share of service members and comprise about 39% of the enrolled Veterans who served in Iraq and Afghanistan; many of who are returning to their rural communities."
- U.S. soldiers in recent conflicts are increasingly drawn from rural areas and, therefore, rural VA users are growing proportionate to urban VA users. **Youths living in the most sparsely populated zip codes are 22 percent more likely to join the Army, with an opposite trend in cities.** Regionally, most enlistees come from the South (40 percent) and West (24 percent).
- Specifically, rural Veterans have lower health-related quality-of-life scores and experience a higher prevalence of physical illness compared to urban Veterans.

- While prevalence of most psychiatric disorders is lower for rural compared to urban Veterans, **rural Veterans with psychiatric disorders are sicker as measured by lower health-related quality-of-life compared with urban Veterans.**
- These differences in health-related quality-of-life scores, which equate to lower self-rated health status, among rural dwelling Veterans, are **substantial, clinically meaningful and associated with increased demand for healthcare services.**
- **Despite greater health care needs, rural Veterans are less likely to access health services for both physical and mental illness either through the VA or the private sector.** In particular, rural Veterans have lower access to care for chronic conditions such as hypertension and post-traumatic stress disorder. (VHA Office of Rural Health www.**ruralhealth.va**.gov)

Enhance and reinstate programming for the Homeless, the Native Veterans, the Rural and Highly Rural, women and those suffering from PTSD in Hot Springs.

Due to constricted staffing, the DRRTP census has significantly dropped in the last few years. Consequently, fewer services are being offered. Reduced or eliminated services include family programming and the Care Management Team. Fewer week-end and evening offerings are available. Multidisciplinary teams for the addictions continuum has been decreased from three to one. The Assessment Units Multidisciplinary process has been reduced. There is usually a wait list or veterans are asked to choose a date in the future as their "desired" date. All of these reductions have resulted in fewer veterans being treated and therefore, fewer veterans receiving the care they need.

Substance Abuse Residential Treatment – Beds 40. This program includes explanation of the addictive and recovery process through groups, classes, and individual counseling. Specialty groups include grief, ACOA, domestic abuse, anger, ethnic issues, assertiveness, gender and gambling issues and a family program.

After Care Treatment – 40 Beds – The aftercare treatment phase is a semi-structured environment fostering a continued addiction free lifestyle through therapeutic programming to develop life skills. The aftercare program provides the time and practice for the veteran to build a foundation of sobriety with a goal of returning to independent living. Veterans in this phase are often employed part time in the Incentive Work Therapy Program. The IT program allows the veteran to slowly adjust to the demands of a work schedule.

Compensated Work Therapy – 32 beds – Veterans in this phase are work ready. They will be placed in a training program or a job which meets their abilities. Work sites are available on station in the Environmental Management Program. Certified Nursing Assistant Training and Painting is program that have been discontinued – but offered the veterans a valuable work training. The Veterans Enterprise will offer further opportunities for CWT and possibly

permanent employment. Transitional Housing on station will supplement the 32 beds. Transitional housing offers a semi-independent living environment which is the final step before independent community living. At the present time the Hot Springs Campus has one TR house. This level of care will be increased as the demand increases, by further rehabilitation the housing on the campus.

Care Management Team – 50 beds – This phase provides holistic care management to meet the patient's psychological, medical and functional needs to support veterans whose age, medical or psychiatric condition results in a temporary or permanent need for supportive or structured living. Medication Management, psychiatry and medical needs are met in this flexible, semi-structured program. This is not designed to be a permanent living arrangement, but it will fill the needs of those in transition to a higher level of care, permanent housing, or those who need more time in a supportive environment.

Post Traumatic Stress Program – 30 beds – The PTSD program provides a Cognitive Behavior Therapy Model. This is a 45 day program. Treatment components include; one-to-one mental health assessment and testing; medications; one-to-one psychotherapy and also family therapy, group therapy (covers such topics as anger, stress, combat support, partners. This program provides treatments shown by research to be effective in treating Veterans such as cognitive behavioral therapy or prolonged exposure therapy. In addition to PTSD, the program also addresses coping skills for veterans with mild or moderate traumatic brain injury (TBI).

Women Veterans – The needs of women veterans are met with the services of the programs listed above. A separate ward in a separate building is used for female veterans. Additional services from the Women's Veterans Coordinator and the OIF/OEF staff are available to meet their needs.

Family Therapy – This program must be revitalized with an emphasis on family centered care. Temporary lodging for families who which to participate in family therapy should be established. Family residences can be provided by remodeling current housing or building family residences on station. See Dom Structure report for more on this.

Legal and Benefits Counseling – Veterans have indicated a real need for legal assistance. Alcohol and Drug addictions often are complicated by involvement with the legal system. When veterans begin to heal, there first goals are to deal with past legal issues. Another service that is currently lacking is access to a veteran's benefits counselor. The facility used to house a VBA counselor on station. When this position was not re-hired, it was really detrimental to the veterans in not only the RRTP, but the surrounding rural and highly rural communities.

Learning Center – This is covered fully in another area of this proposal. Input we have received from current RRTP veterans indicates their desire for a virtual learning center, learning support, virtual classes and a library.

Staffing requirements to re-establish and enhance the programming will be determined by VHA staffing guidelines. It is clear that additional staff will be required to accommodate the larger capacity in the RRTP, to insure the application of up to date treatment protocols, and to serve as liaison to the Veterans Enterprise project.

Appendix D: Inpatient Committee White Paper

We consider the Hot Springs VA a rural health hospital, and offer this summary of what we believe would be an ideal mix of services to enhance and grow the services offered at this facility. While we understand we cannot be all things to all veterans, we truly believe that services and clinics need to be brought back to life at this facility. A 15-year erosion of services, staff, and equipment has occurred as a result of unsuccessful facility integration with the Ft. Meade, SD, and campus.

The Data table below from the Office of Rural Health does not support the statement that there is a demographic shift in urban veterans seeking care in the VA System. If fact, there has been a decrease in unique urban males served by the BHHCS. Further research in the use of non-VA health resources in Rapid City and the availability of alternate health insurance coverage for urban veterans may prove helpful to fully understand the health needs and demands of the Urban Veterans living in Pennington, Meade and Box Butte Counties.

	FY 08	*FY 09*	*FY 10*	*FY 11*	*% of total Unique (FY 11)*	
Rural Male	*5,777*	*5,796*	*6,138*	*5,449*	*30%*	***Rural and Highly rural male veterans account for 71% of the BH Unique in FY 11***
Highly Rural Male	*8,663*	*8,434*	*6,180*	*7,472*	*41%*	
**Urban Male (Pennington, Meade, Box Butte Counties)*	*3,700*	*3,768*	*3,898*	*3,439*	*19%*	
Rural Female	*311*	*326*	*352*	*324*	*02%*	***Rural and Highly rural female veterans account for 8% of the BH Unique.***
Highly Rural Female	*1000*	*1048*	*1090*	*1139*	*06%*	
**Urban Female (Pennington & Meade Counties)*	*259*	*273*	*305*	*279*	*02%*	
Total	*19,710*	*19,649*	*17,963*	*18,102*		***Total R & HR = 79%*** *Total Urban = 21%*
Numbers represent Unique veterans	*Rural Health Profile dated 1/12/2012 (568 Black Hills)-* *All Pharmacy only unique excluded*					

- *There are Urban designated counties in the BHHCS – Pennington, Meade and Box Butte Counties*

The table below shows the number of unique veterans served at each location in the BHHCS. This reveals that Hot Springs has seen a 19% increase in unique veterans treated as compared to 9% at Ft. Meade and 18% at RC Clinic. The major increase in veterans occurred in Hot Springs. This would indicate that resources should be directed to Hot Springs, not away.

An additional factor that affects these numbers is the specialty and surgery workload that has been diverted from Hot Springs to Ft. Meade, in addition to the 43% increase in the use of Fee Basis. This has created an artificial increase in unique veterans in Ft. Meade. Despite the removal of needed services – same day surgery, diagnostic endoscopies, specialty services such as Neurology – Hot Springs has continued to grow.

Unique Vets per FY	FY 08	FY 09	FY 10	FY 11	% difference	Number
Ft. Meade	15400	15768	15969	16258	9%	858
FM CLC	298	290	270	302	1%	4
HS CLC	84	54	61	58	-44%	-26
HS	9067	9185	10175	11175	19%	2108
Dom	459	459	482	438	1%	-21
Non VAH	248	358	378	437	43%	189
RC Cl	4628	5170	5455	5649	18%	1021
Pierre	1793	1714	1677	1648	12%	-145
New Castle	108	86	97	82	-32%	-26
Gordon	171	165	160	218	21%	47
Pine Ridge	177	166	181	157	-13%	-20
Gering	1079	1077	1310	1441	25%	362
Rosebud	159	166	184	205	22%	46
McLaughlin	61	60	57	55	-11%	-6
Eagle Butte	320	301	292	291	-10%	-29
Winner	645	593	575	574	-12%	-71
Ft. Meade PRRTP	103	87	59	84	-23%	-19

Beds

We propose an increase in acute care beds to 15medical beds, and four step-down beds. The 1 East medical ward once had over 20 beds; there is sufficient area on this ward to accommodate additional beds.

We propose re-establishing ICU care at Hot Springs, requesting four ICU beds.

Expand the current ambulatory surgery services into a Same Day surgery unit. The requested ICU beds could have dual usage, either for patients who need critical care or those who may have post-operative complications.

Increase the number of CLC (nursing home beds) to 15 beds. These beds ideally would be both a mixture of short- and long-term care beds, hospice beds, and rehab beds designated as necessary to meet the needs of our veterans. The long-term care nursing home bed concept should be reinstated at Hot Springs, rather than shipping veterans to Ft. Meade.

In the past, the Hot Springs VA had a strong ventilator program in conjunction with a six-bed ICU. We ask that those services be returned to this facility to complement the proposed ICU and CLC beds.

Increase the number of Urgent Care beds from two to five. There is sufficient patient traffic on any given day or evening to support an increased number of beds.

Ancillary Services

Reinstate ultrasound/echocardiogram services to the Hot Springs VA. There is existing equipment at this facility that could be put to use on a daily basis. Have on-site CT services 24/7. There is no reason to transport patients to Fall River hospital or Rapid City Regional Hospital via ambulance for these services.

Propose that former clinics such as Cardiology, Internal Medicine, ENT (Ear/Nose/Throat) and Urology be reinstated at this facility.

Propose that cardio-pulmonary rehab services be fully developed at this site. Such services are a standard of care for COPD, which is one of the major admission diagnoses of this hospital.

Designate VA Hot Springs as the parent site for service-area CBOCs and for all of our existing and proposed services.

Staff Training/ Competency

The argument that staff cannot be competent because they do not routinely perform certain tasks has been presented and used as an excuse to degrade clinical services at this facility. The fact is that employees can partner with service-area community hospitals, and other VA facilities in VISN 23 to achieve and maintain important competencies. Simulation training is

already offered at the Hot Springs VA.

Recruitment

We propose that the efforts for long-term career positions include nation-wide advertisement, offers of permanent employment, and enhancing attraction of positions by providing information about education debt-reduction programs and benefits. The argument that professional employees do not want to live in a small town is unsubstantiated.

Appendix E: Surgical Services Committee White Paper

Hot Springs Surgical Service History

Approximately sixteen years ago, Surgical Services at the Hot Springs VAMC was staffed by four surgeons, five contract specialty surgeons, two full-time nurse anesthetists (CRNAs), six RNs, and a scrub tech.

Surgical Service performed major procedures (cholecystectomy - open and laparoscopic, hernia repair, mastectomy, transurethral prostate resection -TURP) as well as and minor procedures (simple excision/biopsy, endoscopy -upper GI, colonoscopy, sigmoidoscopy, cystoscopy, and prostate biopsy). Compared nationally to facilities of similar size and practice, Hot Springs outstanding morbidity/mortality statistics (record of complications and/or death directly related to surgery) were indicative of highly skilled care and complications which did arise were those often seen in an age group of patients with multiple system disease processes?

In 1995, Hot Springs VAMC merged with Ft Meade VAMC to become Black Hills Health Care System. In the ensuing years, the Hot Springs campus saw our services slowly diminished and eroded. Initially, management was based at the Ft. Meade campus and the various department managers made monthly visits to Hot Springs, but over time, the frequency of visitations decreased. Hot Springs Surgical Services re-invented itself as an efficient, same-day surgery department and maintained a presence utilizing the services of a semi-retired general surgeon, or the services of a short-term contracted surgeon.

There have been instances of highly qualified surgeons who wanted to live in Hot Springs and work at the VA but whose applications have been turned down. In some cases surgeons were given the choice of working at Ft. Meade or not being employed at all by the VA.

Four years ago the Hot Springs VAMC was reduced to one general surgeon who would assist the three or four surgeons employed full time at Ft. Meade, one nurse anesthetist, and five RNs. We still had an orthopedic surgeon and urologist once or twice per week and a contract Ophthalmologist twice per month.

Three years ago, a general surgeon from Ft. Meade came down once per week and performed mainly endoscopic procedures (upper GI and colonoscopy). Eventually it was twice per month and soon the decision was made that our procedure numbers were insufficient to allow the surgeon to maintain his proficiency. This, in spite of the fact that our numbers were included in the total numbers for VABHHCS and the same surgeon was doing procedures at both facilities.

Hot Springs Surgical Service recently employed a full time, board-certified Urologist. She lived in Hot Springs with her young family and intended to stay here. However, she was denied a

permanent employment position after working for three years in a temporary position. She is now a permanent staff urologist at the VA in Helena, Montana.

We have had a fee-basis, or short term contract surgeon who wanted to return to work at Hot Springs but was denied. We believe this systematic dismantling and proposed closure of the VAMC in Hot Springs is not in the best interest of the thousands of veterans who currently need or will need health services.

Current Status of Surgical Services in Hot Springs

The only surgical procedures currently being performed at Hot Springs are ophthalmic surgeries, i.e., cataract removal with lens implant-- twice per month--and minor urology procedures, There is no general surgeon, no anesthetist, and the nursing staff has been parceled out to other departments as their surgical proficiency suffers.

Veterans from this area, western Nebraska and eastern Wyoming are being referred to Ft. Meade or the Minneapolis VA, or other facilities for surgical care as well as screening and diagnostic endoscopy. Travel times of two, three or four hours are not unusual.

Per FOIA request 2012-0028, the numbers of Hot Springs patients referred to Fort Meade for surgery or diagnostic procedures since 2008 have steadily increased: 113 in FY 2009, 171 in FY 2010 and 306 in FY 2011. Additionally, Hot Springs patients were referred to other VISN 23 facilities for care: 41 in FY 2009, 51 in FY 2010, and 37 in FY 2011. Figures provided show that 461 Hot Springs patients were contracted for care to non-VA facilities in 2010 and 655 in FY 2011.

These increased numbers coincide with the cuts and reductions in services at HSVAMC. In 2007 the number of patients referred to Fort Meade was 285. This coincided with the retirement of a full time general surgeon assigned to Hot Springs. In 2008 the number of referrals to Ft. Meade decreased to 151, per FOIA 2012-0028, and coincided with the hiring of another general surgeon who started in 2008 and left in 2009. In 2010 a general surgeon came to Hot Springs from Ft. Meade for one day a week initially, decreasing to one day per month. Of all these numbers, only those referred to VISN 23 facilities, other than Ft. Meade, appear to be for more complex and specialty procedures i.e., neck, spine and lower back disc surgeries, total knee and hip arthroplasties, etc., . These procedures would not be performed at an out-patient, same-day surgery setting. A breakdown of surgery type was not provided for the 461 veterans contracted for care in non-VA facilities in FY 2010 and 655 veterans in FY 2011. For purposes of this proposal, it is assumed that 25-50 would be more complex and/or specialty procedures.

Now that veterans must travel further for exams, we suspect that many veterans are simply opting not to have diagnostic exams done rather than put themselves thru the hardship of prolonged travel times or the stress of dealing with unfamiliar facilities and personnel. Our

veterans have established a trust relationship with their care providers at Hot Springs. It appears veterans are not getting the care they need and deserve because of the aforementioned obstacles. Care delayed is care denied!

Proposal for the Future of Surgical Service in Hot Springs:

We propose that the appropriate level of surgical services be reinstated in Hot Springs to provide care to our highly rural veterans

This includes the acquisition of two to three general surgeons, two nurse anesthetists, and an experienced nurse manager and adequately trained nursing staff. Five to six RNs would be needed for the operating room in addition to a Surgical PA. Two additional RNs would be needed for pre and post op along with a PACU RN. A certified surgical housekeeping staff person would also be required. Sterile Processing & Delivery (SPD) must also have two trained staff and an aide. The total required staff to reinstate Outpatient Surgery is: two general surgeons, two nurse anesthetists, one nurse manager, one surgical PA, eight or nine RNs, one housekeeping staff, along with two trained SPD staff and one aide.

In addition, specialty surgeons are needed on a regular schedule for consultation clinics. These include: audiology, cardiology, ear nose and throat (ENT), endoscopy, nephrology, neurology, ophthalmology, orthopedic, podiatry and urology. Outpatient surgery would be offered on a regular basis to keep the waiting list within one month for the following areas: cataract surgery, other ophthalmologic, orthopedic, ENT, colonoscopy and other endoscopy and urology.

FOIA 2012-0028 supports this recommendation, although we believe that using Primary Care assignment [unclear if there should be another word added to these last three words] under-reports the number of veterans whose surgical needs would be served closer to where they live by providing those procedures at the Hot Springs VAMC.

Per FOIA 2012-0028, 306 Hot Springs surgical patients were treated at Ft. Meade in 2011, and in FY 2010 and 2011, 240 unique patients were referred to non-VA facilities for screening and diagnostic endoscopy (upper GI and colon exams). All 240 would have been served closer to home at HSVAMC. In addition, 461 veterans in 2010 and 655 in 2011 were referred to non-VA facilities for surgical procedures. This would result in anywhere from 231 to 346 veterans appropriate for surgical care in Hot Springs in 2010 and from 328 to 491 veterans appropriate for Hot Springs surgical procedures in 2011. With the addition of another 200 patients in the domiciliary SA/PTSD treatment program, the case numbers would only increase. So it appears, even using only those patients with a primary care provider at HS, there were almost 1000 procedures appropriate to an outpatient surgery performed in
2011.

These figures do not include the increase in RRTP patients mentioned above, some percentage of whom will also need this type of surgery.

We estimate that the potential case load for a general surgeon would exceed 500+ procedures per year based on the veteran population that we currently serve. Adding to the general surgery case load, there are the cases that the specialty surgeons--orthopedic, urologic and ophthalmic--could treat in an ambulatory, out-patient setting. All of these procedures were successfully done at HSVAMC and could be done again when the surgical services are re-established.

The available time for a surgeon would be about 44 weeks, (four weeks of vacation, two weeks holidays, one week education/conferences, one week sick leave). Assuming an average of 11 to 12 procedures a week, one surgeon could do 484 to 528 procedures a year. This assumes that some procedures require a pre-visit and many require a post visit and almost all would need a follow up phone call.

Two years ago, a review and study of the physical status of the operating suites was done and a bid was received to thoroughly update and modernize both OR suites and the procedure room for a reasonable cost. Before any action could be taken to begin the upgrades, Hot Springs surgery was removed from the list of facilities to benefit.

We are deeply concerned about the standard of care veterans would receive at some small rural hospitals and clinics. VA Hot Springs has consistently met The Joint Commission Hospital Accreditation Standards. In addition, Surgical Service follows AORN (Association of Operating Room Nurses) guidelines for nursing practice in the OR. Few, if any, small rural hospitals put themselves thru the rigorous ordeal of a JCAHO inspection and evaluation on a regular basis. Similarly, few small rural hospitals have a dedicated operating room and post anesthesia recovery staff of RNs who are trained and maintain their specialized skills. Small facilities typically pull staff from other hospital areas to cover the OR, the general feeling being that anyone can work in the OR. The operating room is a very specialized and increasingly technically challenging site for care delivery, and veterans deserve care from adequately trained and skilled providers.

Another concern for all contracted services is the security of veterans' personal and health information. The VA administration has provided no information as to how the privacy and integrity of information will be guaranteed. The VA has been in the vanguard of computerized medical records but now we question contract facilities and providers having access to VA computerized health records. How will access be controlled? How will access be monitored? These are important questions that remain unanswered.

When we grow the VA Hot Springs and when the PTSD/Alcohol/Substance Abuse Treatment programs become the national magnet programs that they have the potential to become, we must be able to meet the surgical and diagnostic needs of the 150-200 or more veterans projected in treatment numbers. We must be able to perform surgical and endoscopic procedures to promote and maintain the health of our veterans.

The South Dakota State Veterans Home, also located in Hot Springs, has been approved and funded for a substantial upgrade of new construction. The veteran residents there are also entitled to quality medical and surgical care and this has been provided by the VA, close to home without travel hardship. This care can and should be delivered at VA Hot Springs. Several thousand Native American veterans from the Pine Ridge reservation would benefit from surgical care and screening delivered closer to their homes and families. Those living on reservations are likely under-enrolled for VA services based on the current population of veterans living in these communities.

Recruitment of professional medical staff is always an issue in rural areas. This is obviously exacerbated when closure and downsizing is a continuous part of the culture. Hot Springs is a beautiful, low-crime rate community with many outdoor activities that attract people to move to the area. This has been true of staff serving at the VA as well.

A number of doctors have requested permanent assignment to the Hot Springs VAMC and have been denied this location. However, they were hired at other VA locations. Currently, www.USAJobs.com lists vacancies at several VA hospitals for "board certified general surgeons, proficient in GI endoscopy" with a salary range from $97,987 to $295,000, not unreasonable considering that the surgeon has no office or employee overhead expenses. If no one is aware that Hot Springs Surgical Service needs a general surgeon, it is difficult to recruit help. Additionally, FOIA 2012-0028 also indicates that the amount of money spent on recruitment for Hot Springs has dramatically decreased over recent years.

Appendix F: Historic Preservation White Paper

Introduction

Recently, a proposal to decommission the Hot Springs VA facility was presented to communities in the Greater Black Hills region. This proposal was not favored by most individuals in these communities. The proposal also called for feedback, input, and counter proposals. Community members, determined to "Save the VA", implemented committees to address the various concerns that had prompted the Decommissioning Proposal. The following pages reflect the feedback, input, and counterproposal provided by the Historic Preservation Committee of the Save the VA Campaign.

The Historic Preservation committee determined that an appropriate assessment of past events, current situations, and preferred future path, be conducted. The past events will provide a brief overview of Hot Springs VA history. A summary of events and decisions regarding historic preservation at the VA will also be provided. This crucial summary provides a foundation to understand our current historic preservation situation.

In 2011, the Hot Springs VA was listed as historically significant and as a National Historic Landmark. The Hot Springs VA is also listed on the National Register of Historic Places and is the core of the Hot Springs Historic District. The area is also considered sacred by most Native Americans on account of the healing spring waters, centuries old history, and the number of Native American Veterans that have been assisted at the VA.

History

The history of healing and care for warriors began in Hot Springs hundreds of years ago. The local mineral springs are considered to have healing and medicinal powers to various Native American tribes throughout history. Recognizing their importance and powers, the Cheyenne and Sioux tribes engaged in a battle over the rights to the various springs. The mountain on which this battle took place was subsequently called "Battle Mountain". Centuries later, the

Hot Springs VA would be built on the sacred battleground and was initially named “the Battle Mountain Sanitarium”.

Prior to the construction of the Battle Mountain Sanitarium, Civil War veterans encouraged the construction of a State Soldiers Home in Hot Springs. In 1889, the State Soldiers Home of Hot Springs was opened and long term housing and care was provided for Civil War veterans. 123 years later, this facility is still in use for the same purpose today.

A few short years later, the same Civil War veterans noted the therapeutic landscape, mild environment, welcoming community, the success of the state home, and the healing waters. Thirty disabled soldiers were sent to Hot Springs for “special treatment” in the spring water. All patients benefited from the treatment. Collectively, this information prompted the Veterans and the Grand Army of the Republic to establish a national sanitarium in Hot Springs. In May of 1902, Congress approved the Battle Mountain Sanitarium at the encouragement of President Roosevelt.

Upon its completion in 1907, the VA campus contained an administration building, a service building, bath house, chapel, library, laundry, and a six ward buildings for treatment. The facility was shaped like a ships wheel and constructed to maximize cool breeze, natural sunlight, breathtaking vistas, and a variety of therapeutic settings to meet the needs of various patients. Features included a circular fountain court measuring 180 feet in diameter that was heated during cold weather, and cool lounging areas for the summer. An orchard containing 1,000 trees provided apples, pears, plums and cherries to the patients at the Sanitarium. The National Cemetery was also opened in 1907. Currently there are 1484 burials in this cemetery. A tuberculosis treatment facility was eventually constructed, but became unnecessary and was torn down 16 years later to make way for the new hospital building in 1924. The Conservatory and Green House were built in 1913 and is still stand today. Construction of many new buildings was completed to support, sustain, and grow the quality of health care provided at the Battle Mountain Sanitarium. Services over the years have included trauma and emergency, substance abuse, surgical, dietary, dialysis, ophthalmology, oncology, cardiac care, life skills, transitional skills, and PTSD, just to name a few.

The end of WWII marked the expansion of the Recreational Therapy program. The Hobby Shop taught weaving, woodworking and material arts that provided therapeutic outlets and trades training for the veterans. Veterans in this program could create, construct, and sell their wares within the community. The Hobby Shop was self sustaining for many years and also provided a source of income for veterans.

Many veterans also participated in horticultural studies in the greenhouse and orchards or grounds keeping. Veterans were able to learn agricultural practices, grow their own plants, maintaining a landscape, and provide for others.

Most patients participated in water therapy in the healing mineral springs. Water was pumped from the springs below up to the sanitarium. Various pools provided the opportunity for veterans to soak or exercise in the healing waters. The therapy pools were eventually filled in. It is unknown why the hydrotherapy program ceased.

Some veterans participated in the Compensated Work Therapy (CWT) Program. The CTW program offered an extensive variety of options for rehabilitation. One such program was the painter program, in which veterans were offered hands experience, training and certification in structural painting. In return many maintenance tasks at the VA were completed by the veterans in this program.

Alternative therapies were offered to accommodate various cultural beliefs. True to local Native American culture, a sweat lodge is offered on the Hot Springs campus. This sweat lodge is important to many local Native American veterans. The Hot Springs VA has served more Native Americans than any other VA in the nation.

Many of these therapies are mentioned because of the impact they had on local historic preservation. Some of these therapies also had an impact on the culture of the VA and its history. The Hot Springs VA has demonstrated great flexibility and ability to change. New therapies, treatments, or facilities were required to treat the various veterans of our various wars. One of the contributing elements of this flexibility is the layout of the campus and the ability for historic structures to adapt to meet the needs of a changing community. In the past

years, many therapies have ceased to be used. The Hobby Shop and recreational therapy, painter program and other aspects of the Compensated Work Therapy program, hydrotherapy, landscape and horticultural practices, and others have been eliminated.

While change does occur and various treatments and therapies have fallen in and out of popularity, one thing has remained the same. The continued need for Veteran care is constant and such a need has been demonstrated over the last 105 years at Hot Springs. It is anticipated that the need for Veteran care will increase with the increase in veterans returning from Afghanistan, aging veterans, female veterans, and an increase in Native American veterans. The Hot Springs VA was voted #1 for patient care in the 1990's and has become nationally renowned for the services it offered.

1996 began a merger of services with the Fort Meade Facility in Sturgis, SD. While it was well-intended, the merger proved to be detrimental to the success of the Hot Springs VA, and to the Historic Preservation of the historical landmark. Funding for maintenance and historic preservation practices was split, 40% going to the Hot Springs Facility and 60% to the Fort Meade Facility. Several issues associated with this merger impacted the Hot Springs VA:

- The VA determined that the Fort Meade facility was larger in square footage and needed greater financing than the Hot Springs campus. However, only 1/3 of the landscape at Fort Meade is actually used by the VA. The rest is used occasionally by the National Guard, but financed and maintained by the VA.
- The historical site on which the Fort Meade campus sits is known as the Fort Meade Calvary Post. It was established in 1878 and decommissioned in 1944, surviving on the landscape for only 66 years. The actual fort comprises less than 10% of the Fort Meade VA campus. The fort ceased to serve its original intended purpose in 1944 when it was decommissioned. While this history is significant, disproportionate funding was allocated to maintain the entire Fort Meade campus based on a small historical site is not significant to VA History. Concurrently, funding was cute for the much larger BMS facility that represents national history.

- The Hot Springs VA Facility, consists of 47 buildings and 77 acres. It is only one of the original four remaining national sanitariums built expressly for the care of veterans. It has maintained its original intent and purpose, historic integrity, and continues to serve veterans and Native Americans.

A variety of changes since 1995 have taken place. Positions, services, and facilities were eliminated, deemed unnecessary, or transferred from Hot Springs to Fort Meade. The laundry, certain therapies, patient library, surgical services, and others were abandoned or redirected at the direction of VA administration. Maintenance support also suffered. These positions were and are critical to the upkeep of the Hot Springs Historic campus. These positions were not refilled and the maintenance and painter staff dropped 64% in 15 years. In addition to a cut back in staffing, the existing staff was expected to take on collateral duties that make it difficult to complete their daily tasks.

Currently, many historic preservation tasks need to be completed. These tasks, some federally mandated, were regularly, effectively and efficiently cared for prior to the 1996 merger. The neglect of historic preservation displayed in the last 15 years is a direct result of the management decisions to funnel support and services away from the Hot Springs VA. Furthermore, the lack of commitment to the local VA historic preservation program on the side of administration contributes to the diminished state of the Hot Springs VA structures and historic preservation program.

The past management choices have compromised the current level of historic preservation of the Hot Springs VA. The pending proposal offered by VA administration worsens this level and compromises the historical integrity of the Hot Springs VA campus and newly designated National Historic Landmark. This proposal also propels the VA into a violation and foreclosure of Section 110 and Section 106 of the National Historic Preservation Act (NHPA). The VA is also negligent in failing to begin the National Environmental Policy Act (NEPA) process and comply with several Executive Orders. Some of these processes were established to assist federal agencies in effective decision making. Conversely, the VA has made their decisions to evacuate the BMS prior to even initiating the very laws that were created to assist them in evaluating

alternatives, consider impacts, and come to a well informed decision. The Executive Orders, NEPA and NHPA, in relation to historic preservation, are outlined below.

National Historic Preservation Act

The National Historic Preservation Act of 1966 (as amended) provides for the historic preservation of sites and structures. Section 110 of the National Historic Preservation Act (NHPA) sets out the broad historic preservation responsibilities of Federal agencies. It is intended to ensure that historic preservation is integrated completely into the ongoing programs of all Federal agencies. Section 110 also holds each Federal agency responsible for considering projects and programs that further the purposes of the NHPA, and it declares that the costs of preservation activities are eligible project costs in all undertakings conducted or assisted by a Federal agency.

The NHPA was amended in 1992 to further strengthen the provisions of section 110. Under the law, the head of each Federal agency must:

- Assume responsibility for the preservation of historic properties owned or controlled by the agency.
- Establish a preservation program for the identification, evaluation, nomination to the National Register, and protection of historic properties.
- Consult with the Secretary of the Interior (acting through the Director of the National Park Service) in establishing its preservation programs.
- To the maximum extent feasible, use historic properties available to it in carrying out its responsibilities.

The Battle Mountain Sanitarium was nominated a National Historic Landmark in 2011. Prior to that year, the **VA Central Office conducted a study to determine where historic preservation efforts should be focused. VA Central office concluded that out of the 1,713 buildings managed by the VA, the Hot Springs VA and three other locations were most historically significant. It is out of that study that the Hot Springs VA was nominated and awarded a National Historic Landmark status in June of 2011.**

As outlined by the Department of Interior's Standards and Guidelines, Section 110 also requires that Federal agencies exercise a "higher standard of care" when considering undertakings that may directly and adversely affect National Historic Landmarks. Some of these higher standards require the Federal agency to:

- Minimize the harm to National Historic Landmarks
- Consider all prudent and feasible alternatives to avoid any adverse effect on the Landmark.
- In situations where the Federal agencies alternatives appear to require undue cost or compromise the project's goal or objectives, the agency must
    - Consider the magnitude of the undertakings harm to the historical, archaeological and cultural qualities of the NHL.
    - Consider public interest in the Landmark.
    - Consider the effect a mitigation action would have on meeting the goals.

Section 106 of the (NHPA) comes into effect when 1) there is a federal or federally licensed action, including grants, licenses, and permits, and 2) that action has the potential to affect properties listed in or eligible for listing in the National Register of Historic Places. This act requires Federal agencies to consult on the undertaking and effects and provide the Advisory Council on Historic Preservation the opportunity to comment. The Advisory Council on Historic Preservation (ACHP) is an independent federal agency that promotes the preservation, enhancement, and productive use of our nation's historic resources, and advises the President and Congress on national historic preservation policy. The Section 106 process is outlined below:

- The Federal agency identifies and assesses the effects of its actions on historic resources.
- The Federal agency must consult with the State Historic Preservation Officer (SHPO), Indian tribes (Tribal Historic Preservation Officer), applicants for federal assistance, and

members of the public or other consulting parties and consider their views and concerns about historic preservation issues when making final project decisions. In the case of the Hot Springs VA, other consulting parties would likely include the Hot Springs Historic Preservation Commission, Nebraska SHPO and Wyoming SHPO, and the National Trust for Historic Preservation.

- Determine the possible effects of the project on the historic site or sites.
- In consultation with the SHPO/THPO, make an assessment of the potential adverse effects on the identified historic properties based on criteria found in ACHP's regulations.
- Adverse effects are resolved by mutual agreement, usually among the affected state's State Historic Preservation Officer or the Tribal Historic Preservation Officer, the federal agency, and any other consulting parties.

The proposal to decommission the Hot Springs VA would have an adverse effect on the Battle Mountain Sanitarium National Historic Landmark. Furthermore, it will also have an adverse effect on the National Register Historic District of the city of Hot Springs. Public involvement is a key ingredient in successful Section 106 consultation, and the views of the public must be solicited and considered throughout the process. At this time, the VA BHHCS is in violation of the Section 106 process which has not been initiated, though agencies are required to do so at the earliest stages of project planning. The State Historic Preservation Officer has requested that VA BHHCS immediately begin the consultation process.

Executive Orders

Aside from the NHPA, there are two Executive orders involving historic preservation that have not been fulfilled. Executive Orders 12898 and 13007 are orders that VA BHHCS have neglected to consider with their current proposal to decommission the Hot Springs VA.

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires that agencies avoid imposing disproportionate adverse environmental impacts on low-income populations and minority communities, including impacts on cultural environments.

The Hot Springs VA is located near the three poorest counties in the United States—Shannon, Todd, and Ziebach. These counties are home to mostly Native American populations, a minority group. Furthermore, the area surrounding the Hot Springs VA is designated as a medically underserved area. The cultural environment of most Native American veterans in the Shannon, Todd, and Ziebach counties would be adversely impacted by the closure or decommissioning of the Hot Springs VA. The Cheyenne River, Crow Creek, Fort Peck, Lower Brule, Pine Ridge, Rose Bud, Yankton, Santee, and Stand Rock Indian Reservations have declared that they are not in agreement with the closure of the Hot Springs VA. The low income populations served by the Hot Springs VA would also suffer detrimentally from the VA's closure.

Executive Order 13007, Indian Sacred Sites, requires agencies to try to avoid adversely affecting Indian tribal "sacred sites" located on Federal land and tribal access to such sites.

It has been stated by many Native Americans that they view the Hot Springs VA as a sacred site or traditional cultural property due to the many Native Americans that have been healed there over time, both prior to pioneer settlement and after the construction of the Battle Mountain Sanitarium. Prior to pioneer settlement in the area, the hot springs were used by the Crow, Cheyenne, and Sioux as healing waters. The Hot Springs VA is also one of the few VA's that offers a sweat lodge on the grounds for traditional healing. A recent event attended by nearly 1000 Native and non-Native veterans and supporter demonstrated the importance that the Battle Mountain Sanitarium holds for many individuals. A Resolution recently put forth by Native American tribes declares the Hot Springs VA a sacred place. This resolution was signed

by the Cheyenne River, Crow Creek, Fort Peck, Lower Brule, Pine Ridge, Rose Bud, Yankton, Santee, and Stand Rock Indian Reservations.

National Environmental Policy Act

The National Environmental Policy Act is a federal law that requires federal agencies to implement projects that promote the enhancement of the environment. This law is accompanied by procedural requirements for all federal government agencies to prepare Environmental Assessments (EAs) and Environmental Impact Statements (EISs). EAs and EISs contain statements of the environmental effects of proposed federal agency actions. The effects could be cultural, social, economical, environmental, or historical. In the case of the Hot Springs VA, an EIS would consider the many different impacts that would result from the closure of the Hot Springs VA and subsequent construction of a new facility in Rapid City.

History in the Future

The VA's proposal compromises our national history and belittles the contributions of the BMS National Historic Landmark, and the contributions of veterans over the last 105 years. The disregard for Native American sacred sites is blatant and disrespectful. The VA has declared that historic preservation tactics are costly and "not on board" with the mission of the agency. The lack of financial commitment and program support to maintain the BMS and the lack of legal compliance is disappointing violation of federal law. The VA has not conducted a cost or condition assessment to determine the cost of continuing operations at Hot Springs. It has not conducted such a study to justify the need for a new facility in Rapid City. Our goal is to offer solutions for effectively and efficiently meeting the historic preservation needs while economically providing the best care for our nation's veterans. The historic preservation committee has devised the following proposals.

Compensated Work Therapy (CWT)

The CWT program will expand to certify compensated work therapy patients in historic preservation practices. The standard operating and maintenance plan for the BMS campus will

continue to be determined and directed by VA facilities staff. The work will be conducted by CWT veterans. This program will be a national model and success story for federal agencies and their ability to successfully administer a therapy program as well as a Section 110 program, per the NHPA.

Renovations necessary to the current campus to comply with the future demands would and could be completed through this program. Aspects of employment, contracting, regulations, and guidelines can be taught through this program. Participants will eventually leave the program with accreditation in a skill they are also able to use after their rehabilitation. The program would assist in the following ways:

1. Labor costs would be reduced through the program.

2. The historic preservation maintenance of the VA will be met through cost effectiveness approaches.

3. The veterans will receive a new, marketable skill, contributing to their future success.

National Archives

The Battle Mountain Sanitarium National Historic Landmark is the oldest functioning veterans sanitarium in the country. Veterans from the Civil War thru the War in Afghanistan have healed at BMS. The VA's National Archives is looking for a home. The historic BMS is perfectly suited for this honor. The existing buildings can easily be adapted to accommodate this task, including the Governor's Mansion and many others which would be ideal for this national honor. These buildings will be climate controlled and secure research environment for the agencies most sensitive and precious documents. Not only is the BMS an adaptable facility, but it is also near the geographical center or the United States. This location will lend to an ease for researchers, employees, and veterans and others to utilize the National Archives. This new National Archives would also benefit the community with increased research opportunities to locals and visitors nationwide.

National Historic Landmark

The National Historic Landmark status is an honor. This honor needs to be accepted and promoted by the VA and celebrated by the community. Other historic properties awarded NHL status includes Wounded Knee, the birthplace of Martin Luther King, and the home of Paul Revere. These locations, just like BMS, have defined us as a nation. This NHL represents our national history, not just local history.

In summary, the VA has the opportunity to offer the best possible care for our veterans, and meet the growing need for increased and improved care for Native American veterans, female veterans, PTSD and substance abuse patients, and an aging veteran population. This situation also offers the opportunity for the VA to become compliant with federal laws and the VA's own manual. Lastly, the current situation offers the opportunity for the VA to celebrate our national history and become a model of cutting edge therapy, cultural resource management, and contributor to a nationwide community.

Appendix G: Native American Committee White Paper

Introduction

Of all the sub-groups receiving care at the Hot Springs Veterans Administration Medical Center (HS VAMC), the Native American veterans residing on the nine Indian reservations of South Dakota will certainly be the most adversely affected. In meeting after meeting on the Pine Ridge Reservation, Native American veterans have vehemently expressed dismay and opposition over the proposed closure of the Hot Springs VA facility. The following report reviews some of the special concerns and considerations of the local Native American population.

Tradition

History, tradition and trust are important factors in the lives of Native American people. It takes time to build a relationship between two groups of people who share a long history of confrontation and suspicion, but during the last hundred years our Native American veterans have gradually come to place their trust with the doctors, nurses and other employees of the Hot Springs VAMC. Ties like these have not necessarily occurred at VA facilities in other areas, where Native Americans say they do not receive the same degree of respect and acceptance.

Additionally, Hot Springs (*minnekahta* in the Lakota language) has long been venerated by the indigenous people as a sacred healing site. In 1869, Lakota and Cheyenne warriors fought a fierce battle for possession of the source of the "healing waters" from which Hot Springs draws its name. Over the decades since 1907, the VAMC and its surrounding community have achieved renown for the welcoming, nurturing spirit extended to the many thousands of veterans, including Native American *akichita*, who have come to be healed atop Battle Mountain.

Historically Strong Representation in the Military

Among indigenous American tribes, few can claim equal status with the Lakota as a warrior culture. For hundreds of years, young men--and even young women--have honed their skills in the art of war and have prided themselves in defending their people and way of life. In all America's wars of the past 100 years, the Native American population has contributed in disproportionately high numbers to the American military. Nine Indian reservations in the state of South Dakota boast significant numbers of resident veterans. Not all are registered, but Veteran Service Officers from just four of those reservations have offered the following numbers:

Pine Ridge	3,969
Rosebud	750
Cheyenne River	1,247
Standing Rock	1,200
TOTAL:	7,166

Those figures undoubtedly will increase dramatically with the return of veterans from the Iraq and Afghanistan wars. Many of those returning have not yet begun to utilize the Hot Springs facility because their medical and mental/emotional problems have yet to surface to the point of causing them to seek help. It should be noted that most Native Americans enter the service as enlistees rather than as officers, and so are more likely to see combat, resulting in a significant incidence of Post Traumatic Stress Disorder diagnoses.

The Plains Indian culture places high priority on respect, honor and trust. As a proud people with deep traditions, the Lakota value the respect accorded them in Hot Springs, and fear they will lose this quality of treatment with closure of the VAMC in Hot Springs. Over and over, Native Americans report they do not receive the same level of treatment in Rapid City or Ft. Meade, and they emphatically state they do not want to go to those facilities or to the Indian Health Services (IHS) hospitals.

Special Needs for Native Veterans

Since the establishment of reservations for indigenous peoples, Native Americans have struggled with a range of addictions, exacerbated by high unemployment and PTSD for returning veterans. Three of the poorest counties in the United States are located on South Dakota Indian reservations. Although at least one of the reservations (Pine Ridge) is dry, illicit drugs and alcohol are available. The town of White Clay, Nebraska, located within walking distance (two miles) from the town of Pine Ridge and supporting a population of ten residents, sells approximately five million cans of beer per year, virtually all destined to be consumed by Native Americans from the reservation.

Conditions on the reservations can be severe, with below-standard housing, sub-zero winters, high rates of unemployment, suicide and domestic violence, and the highest rates of infant mortality in the nation, all working to place returning veterans in at-risk situations for drug and

alcohol use. Even veterans who recognize a problem and seek treatment often have difficulty maintaining sobriety when they return to homes where they may be surrounded by family and community members who continue to drink and use drugs.

Honor and pride are important to Native Americans, who are often reluctant to seek help or to appear weak. Cultural sensitivity is a high priority for the Hot Springs VAMC, which has designed an excellent PTSD program around the cultural values of honor, pride, respect and dignity. The Hot Springs facility was the first in the nation to offer a sweat lodge (*inipi*), in which Native veterans pray for strength to reconnect with their spiritual values. The sweat lodge has been an active part of the Hot Springs facility for 20 years, with some 10,000 documented veterans, both native and non-native from all across the United States, taking part in the ceremonies.

Lack of Health Care Facilities on the Reservation

In his proposal of December 12, Stephen DiStasio suggested that veterans services could become community-based through Indian Health Services (IHS), which is not a comparable system and which is already overwhelmed. Many IHS doctors take a two-year assignment at IHS hospitals to work off their student loans, and a common sentiment of Native American veterans is, "We don't want to go to the IHS so that young and inexperienced doctors can practice on us. We aren't guinea pigs."

In a speech before the National Congress of American Indians on March 7, 2012, VA Undersecretary of Health Robert A. Petzel stated:

"Compared to urban veterans, rural and highly-rural veterans have lower health-related quality-of-life scores and a higher prevalence of physical illness. At the same time, rural veterans are less likely to have access to mental and physical health services they desperately need--especially for chronic conditions such as hypertension and Post Traumatic Stress Disorder."

For both addiction and PTSD treatment, the mental health facilities of the VA system are critical. This type of support is nearly non-existent on the reservations, and what is available is not specifically geared to the needs of veterans.

VA Undersecretary of Health Petzel concluded his March 7 speech with the words: "You have my promise that VA will always try to be there for America's native veterans--to care for those who shall have borne the battle."

Special Advantages of Hot Springs Facility

In contrast with the poor health care support provided on the nine South Dakota reservations, Hot Springs is well known as a caring, supportive community for healing veterans. For over two hundred years, Native Americans have journeyed to their sacred *minnekahta* in the Black Hills

to avail themselves of its healing power.

There appear to be several reasons why Native Americans prefer to utilize the Hot Springs VA Medical Center rather than the Ft. Meade or Rapid City facilities, in part because Hot Springs is closer and more accessible to them. Even in cases where travel distances are not shorter, veterans prefer to travel to Hot Springs, where they feel they receive higher quality care.

Native American veterans from reservations as far away as Lower Brule, Crow Creek, Cheyenne River, Standing Rock, Yankton, and Lake Traverse have expressed a strong preference to receive treatment at the Hot Springs VAMC despite the fact that a round trip to Ft. Meade or Rapid City would involve less total mileage and travel time. There are several reasons for this. Reservation veterans frequently cite an all-too-familar pattern of harassment towards Native Americans by South Dakota law enforcement officers on the major highways leading into Rapid City. *Akichita* typically complain of being targeted because of physical appearance, the number of occupants in the car, or due to a mal-functioning head or tail light on a "rez car." There is a perception that racial profiling generates a disproportionate number of pullovers against Native Americans, leading to imposition of traffic fines up to $300 per violation.

In contrast, Native Americans often mention the serenity of Hot Springs, the attraction of its advantageous housing/rental fees for outpatients and their families, as well as the townspeople's reputation for warmly receiving all veterans and honoring their service. Additional reasons for preferring Hot Springs over Sturgis or Rapid City are the marked absence of vice and distractions for those enrolled in treatment programs for PTSD, mental disorders or substance abuse. Hot Springs offers special advantages for Native American veterans. It is much closer to the reservation, encouraging more frequent visitation from family members. Ft. Meade is twice as far for Pine Ridge Reservation families to travel. Additionally, Native American veterans are less likely to receive harassment from state troopers when traveling closer to home, and have less to worry about a vehicle that might not meet state standards for longer travel.

Near-Term Planned Tribal Initiatives

The proposed closure of the Hot Springs VAMC has prompted the Veterans Committee of Pine Ridge Reservation to call for a vets convention in April, 2012, to organize and let their voices be heard. As a sovereign nation, the Lakota people will have their chairman and special delegation go to Washington, just as nations from other countries send their ambassadors. They will call on senators and representatives on the Veterans Committee, Indian Affairs, the Department of the Interior and especially Senators John McCain and Daniel Inouye.

Summary

The history of the United States is inextricably tied to Native American culture, but Native Americans cannot simply be relegated to the annals of history long past. People of the Lakota Nation, long known for their valor and skill on the battlefield, continue to volunteer in record numbers for today's military service. When they return home to their families and reservations, they deserve special consideration for their needs and concerns, which are often unique or severe and cannot be met by other governmental agencies.

Hot Springs has consistently and respectfully provided that care, and the tribe is united in supporting the continuation of that success. To the Lakota, healing needs to be spiritual as well as physical, and they strongly believe that there is no better place for it to take place than in their traditional "healing place" in the sacred *Paha Sapa* (Black Hills). The alternatives (Ft. Meade, Rapid City or the IHS) cannot compete.

History has not been kind to the indigenous people of the plains, but they continue to love this country and to serve loyally in disproportionate numbers in the ranks of the US military. Now our country has a chance to make their lives a bit easier by ensuring continued operation of the Hot Springs VA hospital and Domiciliary. These proud people deserve to be treated with empathy, dignity, respect and honor. Native American veterans are neither guinea pigs nor throw-away people and they should not be forgotten.

Appendix H: Veterans White Paper

We represent the veterans of the United States Armed Services. We have rucked through the jungles near Long Binh. We were aboard the aircraft carrier Enterprise when it exploded under a kamikaze attack off Okinawa. We were at the barracks in Beirut in 1983. We manned isolated outposts in the Army Security Agency. We liberated Kuwait. We patrolled the streets of Baghdad in 120 degree heat.

We understand words like "honor," "sacrifice," and "integrity," because we live them. Some of us were drafted and some of us voluntarily enlisted. Our Native American and rural populations have always had a higher percentage of service than any other cross-section of our population. On the reservation and in the country, good health care is not always easily accessible.

Iraq and Afghanistan have ended the myth that women do not serve in combat. Now everyone knows what we have always known, that generations of women have served on the front lines. Women in uniform are an integral part of our nation's security.

We speak not for ourselves individually, but for our brothers and sisters. We know that veterans of each era and conflict have different needs. The WW II, Korean and Vietnam veterans are an aging population and have different needs than those of younger veterans. We have cycled two million service members in and out of Iraq and Afghanistan during the War on Terror. Each conflict has its own unique problems.

No matter what branch of service or the era or conflict in which we served, we are united in our belief that now is not the time to shrink VA services. We are united in our belief that it is never the time to contract our care out to third party providers. With two of our longest wars winding down, now is the time to expand services for veterans.

Our brothers and sisters are now rewarded for their service by a VA that believes it is appropriate to contract with homeless shelters to house veterans. We are appalled. It is beyond our comprehension that a brother or sister who has been awarded a purple heart could return home and be placed in a homeless shelter by our VA. This madness must end. We can do better.

We need to expand our inpatient/outpatient services. Full diagnostic capabilities at the Hot Springs VA must be reinstated. These services are crucial in order to maintain the Hot Springs VA as a rural hospital and parent VA Medical Center for the proposed rural Community Based Outpatient Clinics.

On December 12, we were told that the Hot Springs VA needs to be closed and replaced with a CBOC. The proponents of this plan tell us that Hot Springs is a dying community. They tell us that a "third party contracted medical provider" will provide the same quality of service that our brothers and sisters now enjoy. Other parts of this white paper will address the

"economics" of the VA plan. However, there are intangibles that the VA has failed to quantify or address. These intangibles are just as critical to meeting the VA's objective as are the size of the work force or the size of the budget. Even though you can't put a number on it, you must consider the commitment of the Hot Springs VA staff and the commitment of the Hot Springs community to the veterans of our nation.

The staff at the Hot Springs VA is beyond compare. BHHCS Director Stephen DiStasio has conceded that VA survey cards overwhelmingly show that the staff at the Hot Springs VA is top notch. Each day our veterans are treated at the Hot Springs VA and each day our brothers and sisters are treated with respect and kindness. No matter the position (nurse, patient advocate, secretary), the staff at the Hot Springs VA help get each veteran to the right place, help each one fill out the right form and make sure to schedule that follow-up appointment. And they do it with a smile.

Finally, the Hot Springs community is committed to serving veterans.

Hot Springs is a small town that welcomes our veterans. Each day this community pitches in to help veterans and asks nothing in return. The local taxicab driver gives discounts to veterans and does it without recognition. During the winter months one sees average citizens helping a wheelchair-bound veteran through a patch of snow.

Nothing is asked in return. And when veterans asked for help to stop the proposed cuts in the Black Hills VA System, the entire community responded.

Nothing demonstrates this community's commitment to veterans more than the march to the VA on February 25. On that day, the Hot Springs community fed hundreds of supporters and organized a march of over 1,000 people.

We are united in our belief that now is not the time to shrink VA services.

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Appendix I: School Committee Report White Paper

This white paper is written to ensure the Veterans Administration that the children of their professional and support staff will have an opportunity for a high-quality education in the Hot Springs School District. The district is aware that a quality education for their children is very important to prospective residents of a community. We can and do provide for that education and there should be no doubt to the Veterans Administration that this is another reason the VA can and should remain in Hot Springs.

District Achievements

The district has been able to continue to hire quality teachers that meet NCLB requirements. The district is proud of the educational programs that have been established. Hot Springs School District has been able to meet AYP (Annual Yearly Progress) yearly since its inception. It should be noted that the elementary and high school were named distinguished schools for the 2005-06, 2006-07 school years and the high school again in 2009-10. Some of the special features of the Hot Springs School District are: an expanded Pre-K program, an all-day kindergarten program, a strong technology system and program with laptops provided for each high school student, and excellent professional development opportunities for all staff as well as an alternative education program. Students preparing for higher education are required to complete ACT testing. Students not preparing for higher education are also encouraged to complete ACT testing. Even so, our composite average scores are comparable with average state scores.

Highly Qualified Staff

We have a highly qualified staff with many certified teachers holding master degrees and many years of experience. 52% of our staff has 11-35 years of experience in education with another 8% providing 36-40 years of experience.

Graduate Accomplishments

Graduates from this school district have gone on to attain higher education and career opportunities. Three Rhodes scholars, a four-star general, lawyers, doctors, professors, morticians, pro basketball players, and coaches have graduated from this school district. Four students have enrolled at West Point; three students have enrolled at the Air Force Academy and one at the Naval Academy. All but one of those students has done this since graduating in 2006. Having a connection to veterans and a strong feeling for patriotism, many our students have joined the military service branches.

Hot Springs High School Graduates who have entered the Military

School Year	# Signed or Entered Military Service	# Total Graduates	% of Total Graduates Entering Military
2011-2012	4	54	7%
2010-2011	12	72	16%
2009-2010	9	83	10%

Facilities and Community Investment

The community has also made a large investment in its school facilities, most recently building a new structure to provide elementary classrooms, Title I and Special Education areas as well as additional physical education classrooms, handicapped restrooms and lockers. The physical education portion will be available to adult community members for use of the walking track. The decision to go forward with these structures and the long-term debt assumed was done with the expectation that our student population would remain stable and the VA would continue here. Our facilities allow our students to experience extracurricular activities and social interaction that can be used throughout their lifetime. We have invested in a technology program that provides laptop computers with high-speed connectivity to all high school students and also provides staff with tools to interact with students in a high-tech environment.

School and Community Bond to Veterans

The Hot Springs School District has 87 full time employees. We have 12 employees who are veterans and 17 employees who are the spouses of veterans. This makes a total of 29 employees that are veteran- connected. More than one employee stated that they moved to Hot Springs because of the VA being here. 33% of our school district is veteran- connected.

The school has a significant bond with the veterans, the VA facility and staff. Every year the students present a Veterans Day program. This is one of the proudest moments for both veterans and students and the auditorium is packed for each year's program. A video of past and current members of the military is presented, including their rank and area of service. The students have developed a strong sense of patriotism by what they have learned from our veterans.

Students have done job-shadowing at the VA and student internships.

Groups of students visit with the veterans to present programs, to entertain and to learn from

the veterans about their part in protecting our freedom. The veterans of our community compliment the students for their patriotism and the respect they show the military at community events and during opportunities for personal contact.
Student internships have included DECA, Career Exploratory, and Senior Experience. The National Honor Society and the Student Council are strong supporters of our veterans and provide volunteer hours at the VA. Over the past 10 years, the number of volunteers ages 11-20 at the VA has been reduced from 48 (with a high number of 62 in 2006) to only 12 volunteers in 2011. This can be related to the number of services the VA offers. Reduction in services reduces the amount of volunteers needed, therefore reducing the opportunities for our students to have this experience. Students also make and send holiday greetings as well as care packages to our soldiers overseas as well as our local domiciliary residents.

Impact on the School District

We feel the Hot Springs School District has a very positive image now and in the past, but we also have to look at the impact on the district if the VA services are diminished or closed. In 1995 there were 1001 students enrolled and 492 employees at the VA. In 2011 there were 813 students and 385 VA employees. While we cannot directly connect the total drop in student numbers to decline in VA staff numbers, it would certainly appear there is some connection. Further reduction would no doubt cause smaller enrollments.

The district receives Impact Aid for students who have parents that work and/or live on federal property. Impact Aid is a very important source of revenue for the operation of the Hot Springs School District. These federal Impact Aid revenues come to the district in lieu of local tax dollars for land that is owned by the federal government. We feel it is the federal government's responsibility to pay their tax bill the same as our local property owners. Our district has many acres of federal property — some eligible for Impact Aid and some not. For our district, we receive around $22,000 for those students connected to the VA. We currently have 118 students with parents connected to the VA.

The largest impact would be the loss in state aid and school apportionment which are calculated per head count. That amount is approximately $5,000 per pupil. It is easy to see that the loss of 50 students would amount to approximately $250,000 or a quarter of a million dollars. 100 students would be $500,000 or a half-million dollars.

School districts in South Dakota faced a mandatory 6.6% reduction in state aid in the school year 2011-2012. These kinds of losses have and will continue to have a very serious negative effect on the district's programs.

In addition to these more obvious reductions, there are trickle-down effects—less community/fewer services needed, businesses closing or declining in services, property valuations dropping and many more negative effects resulting.

Appendix J: Hot Springs Business, Community and Economic Impact White Paper

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What Hot Springs Offers to VA Black Hills Health Care

Among numerous variables validating Hot Springs as a community of positive rehabilitative and life-style qualities for veterans are areas such as crime rate statistics, community demographics, and the overall small town environment. Hot Springs offers many of the same or similar benefits, services, and recreational opportunities as Rapid City. However, Hot Springs emphasizes care for veterans and prioritizes those who have served our country individually and as a prominent sub-culture in our community. Hot Springs has proven for over a century to be a community to not only support, but embrace the veterans who visit or choose to reside here.

Hot Springs prides themselves in being a "Veteran's Community", many local businesses' offer a veterans discount. The local taxi service exists specifically for veterans. This is one of the many examples of how the veterans are treated with respect and care throughout the community. The local taxi service not only provides a Veteran's Discount, but veterans receive top priority when multiple calls are pending. In addition, we have several businesses' that provide non-transportation services such as grocery shopping, running errands, etc. Hot Springs will continue to provide a safe, comfortable, friendly small town atmosphere for veterans, temporarily utilizing services or considered residents of the community.

Based on property crime on a scale from 1 (low) to 10, Hot Springs ranks at a level one, Rapid City ranks at a level 5, with the national average of 4. Property crime in this study includes the offenses of burglary, larceny-theft, motor vehicle theft, and arson. Hot Springs is ideal for veterans living on a "fixed" income. The following cost of living indicators are based on a US average of 100. An amount below 100 means the community is cheaper than the US average. Rapid City scores 94.7, while Hot Springs is only 83 on this scale (www.bestplaces.net). Hot Springs also has an abundance of homes offered for sale. There are 3 subsidized housing properties that offer over 300 units to people based on their income. On an average, at least 25% of the tenant population have received or continue to receive services and treatment at the VA campus, and another dozen tenants have worked or continue to work on the campus. There are several different contractors available to build on the lots and acreage

surrounding our town. There is much potential for someone wanting to make Hot Springs a permanent home. The nationwide growing problem of homelessness is an ongoing concern. Our homeless count for 2011 was 51 in Fall River County, as opposed to 506 in Pennington County.

The community of Hot Springs has unique and exemplary offerings regarding the care and rehabilitation of veterans. The tranquil setting, favorable climate, healing environment, and history of successful rehabilitation all play a role in the health and wellbeing of veterans and the community. With its healing waters, serene surroundings and mild climate, Hot Springs provides the perfect environment for the recovery of veterans from physical, emotional, and spiritual injuries.

The State Veterans Home was originally built in 1882, to care for aging and injured veterans. Shortly thereafter, the area was recognized for its community activism for veterans, “wonderfully impressive” care of veterans, and the “curative qualities of the water”. These rave reviews, along with a growing industry of tourists attracted to the pleasant climate and medicinal waters, encouraged the construction of the Battle Mountain Sanitarium. The Sanitarium (now the Domiciliary) was designed to provide a breathtaking view for the patients, incorporate the abundant sunshine, and maximize the natural breeze through all the wards.

Hot Springs is famous for its healing waters. They (the springs) were considered by the Native Americans as a remedy for all that ills. The water has been found useful in the treatment of chronic disease of the gastro-intestinal tract, disease of the liver and biliary passages, in rheumatism & arthritic joint disturbances, gout, and others. (Quote from Mineral Water in the United States by Dr. W.E. Fitch.) Over 120 natural and mineral springs abound in the area. Many are recognized for their healing capabilities. There are three large springs located in Hot Springs. The Mammoth Spring furnished the water that was pumped to pools in the Domiciliary to provide healing to the veterans. In the downtown district veterans can journey daily to fill their domestic water containers at Kidney Springs. The water flows out of the rock canyon wall and into a basin at the Kidney Springs Gazebo, which is a Victorian trellis topped with a statue called "The Gift of Water." From here you are on the Freedom Trail that

winds its way along the banks of the Fall River. With this river flows the healing warm water, springs, a waterfall & the occasional wildlife. The water in the river ranges between 81°F and 92°F at all times.

Hot Springs is home to the World's largest natural warm water indoor swimming pool. Naturally warm 87°F mineral water flows from an enormous thermal spring at a rate of 5000 gallons a minute. The therapeutic "healing" water has soothed visitors for over one hundred years.

Cradled in the peaceful hills above Hot Springs, the Hot Springs Domiciliary and surrounding environment embodies the hope of recovery from emotional trauma. In addition to the “visible” wounds of war, there are a significant number of veterans requiring mental health services for psychological trauma. Current studies have estimated that 20.3% of active duty and 42.4% of reserve duty soldiers require mental health services for Post-Traumatic Stress Disorder (PTSD). [1]

Using nature as an instrument in healing is supported through existing research. Numerous studies have been done that demonstrate the benefits outdoor spaces bring to patients, staff, and visitors (Marcus and Barnes 1999 [2]). Hot Springs provides four areas to enjoy fishing within a 10 mile radius. There are also many places to participate in boating, camping, hiking, biking, skiing and swimming.

Known as the “Banana Belt”, Hot Springs climate is unique to the Black Hills and prairie region. With one of the highest average annual temperatures in the state, the winters are marked by moderate snowfall with warm temperatures. This natural and native climate allows for veterans to have the freedom to move year round. It is common to see wheel chair bound veterans and community members traversing sidewalks and city streets in the winter. Pleasant weather, well maintained sidewalks, and the Freedom Trail promote an active lifestyle, sense of independence, and mobility for our veterans.

We have the Michelson Trail, and the Minnekahta Trail Head is just west of town, and there is over 100 miles of bike & walking trails with breathtaking scenery. The tranquil setting and history of outstanding

care allows our veterans that are suffering from PTSD and substance abuse issues to heal and recover in a serene, secluded and tranquil environment. Comforted by a longstanding tradition of healing, a pleasant climate, therapeutic environment, and a supportive and easily accessible community, the community of Hot Springs is the perfect setting for veteran care.

[1] Milliken, C.S., Auchterloinie, J., and Hoge, C.W. (2007). "Longitudinal Assessment of Mental Health Problems Among Active and Reserves Component Soldiers Returning From the Iraq War." JAMA, vol. 298, no 18.

[2] Breslau, N., Davis, G.C., & Schultz, L.R. (2003). Posttraumatic stress disorder and the incidence of nicotine, alcohol, and other drug disorders in persons who have experienced trauma. Archives of General Psychiatry, 60, 289-294.

Economic Impact of the VABHHCS Proposal on Community and Business

Economic Impact

The current proposal by VABHHCS would reduce total employment from 385 employees to 55 employees, eliminating 330 positions in Hot Springs over the next 5 years. Following is a summary of projections of some of the economic impact on Fall River County if this proposal is implemented as described.

- A ripple effect of job losses in the area will bring the total employment loss to 453 positions or 15% of the total employee count in the county.
- Many employees live outside of the county. The number of positions lost by residents of the county will be 379.
- There are a total of 3010 employed workers living in the county. 12.6% will lose their jobs.
- Total wage loss by county residents will be $17.5 million.
- Total wage income in the county last year was $88.2 million. The county will lose 19.8% of its total wage income.
- Population can probably be expected to decline in a similar fashion to employed workers.

The following sections explain how these projections were derived.

Analysis done by SD Labor Department

The current proposal by VABHHCS would eliminate 330 employee positions in Hot Springs over the next 5 years.

An economic impact analysis of the impact of the VA proposal on Hot Springs and surrounding area was done by the Labor Market Information Center of the SD Department of Labor and Regulation (Appendix A). This study projected the loss of 330 positions at the VA would also cause an indirect loss of an additional 123 jobs in Hot Springs and the surrounding area for a total of 453 jobs lost. Total labor income loss was projected at $21.5 million.

Employment and wage loss as a percentage of total employment and wages

Fall River County, per the US Census Bureau, has an employed work force of 3010 positions[2]. The total projected loss of positions, both directly and indirectly, caused by the VA proposal is 453. This is 15.0% of the total employee count in Fall River County.

The VA proposes to build a community based outpatient clinic co-located with Fall River Hospital, the State Veterans Home or as a stand alone unit. They also propose to buy more inpatient and outpatient health services from local providers. These two proposals have some potential to add employee positions in the private sector. However the VA may also be including these positions in the 55 positions the proposal projects to be left in Hot Springs. At best these would be a very few positions added to the economy and will not be considered in this analysis.

Most VA employees live in Hot Springs but many live in Fall River County outside of Hot Springs and some come from communities outside of Fall River County. Obviously Hot Springs will feel the greatest economic impact from jobs lost by employees who live in Hot Springs, a lesser economic impact from jobs lost by employees from Fall River County but outside of Hot Springs and little impact from jobs lost

by employees outside of Fall River County. Similarly Fall River County will feel the greatest impact from jobs lost by Fall River residents and little impact from jobs lost by residence outside of Fall River County.

According to employee data gathered by the Hot Springs Save the VA group 74.11% of VA employees are Hot Springs residents, 83.65% of VA employees are in Fall River County and 16.35% reside outside of Fall River County. To adjust our employment numbers based on location of residence we can say that of the 330 VA positions being lost, Hot Springs will lose 247 positions (74.11% of 330) and Fall River County will lose 276 positions (83.65% of 330). We must assume that a percentage of employees who indirectly lose their jobs due to the VA losses will also reside outside of Hot Springs and Fall River County. For this analysis we will assume that these positions are spread through the county and outside of the county in similar percentages to the VA employees. This may introduce a small margin of error but it should have little effect on the projected numbers. Using this assumption to adjust our employment numbers based on location of residence we can say that of the 123 total positions being lost indirectly, Hot Springs will lose 91 positions (74.11% of 123) and Fall River County will lose 103 positions (83.65% of 123). Total employee loss for Hot Springs will be 336 and for Fall River County will be 379.

Fall River County, per the US Census Bureau, has an employed work force of 3010 positions[2]. The adjusted count of employees residing in Fall River County who will lose their positions due to the VA proposal is 379. This is 12.6% (379/3010) of the total employee positions in Fall River County.

The average wage of our VA employees is $53,363 per year (Appendix B). Wage loss due to 276 VA jobs lost in Fall River County will be approximately $14.7 million. The average earnings for workers in Fall River County is $27,732 [1] per year. Wage loss due to the 103 indirect job loss will be an additional $2.8 million. Total projected wage loss $17.5 million. Total estimated wage and salary income for Fall River County in 2010 was $88.2 million[3]. The projected wage loss due to the VA proposal is 19.8% of the total wage and salary income for the county.

Population loss as a percentage of total population

Population loss is the metric which probably has the most impact on the community and probably the most difficult to project. People follow jobs and, in general, we might expect population lost to be similar to job loss. This would predict a loss of 12.6% of the population. Current population of Fall River County is 7078[2] so long term population loss might be projected at approximately 890 people.

The VA will offer early retirements as a way to soften the impact of job losses. If the proposal is implemented over 5 years a significant number of people will retire and this will soften the population loss in the short term but probably not in the long term.

Estimate of Impact on Real Estate Values

The current proposal by VABHHCS would have a grave impact on real estate values in the Southern Black Hills. The Southern Black Hills Association of REALTORS has provided the following statistics.

The current VA Employee Data Appendix B gives the county statistics as to the number of employees residing in the surrounding areas. The largest employee count is in Fall River County and the Hot Springs area, therefore the statistics concentrated on this area for the evaluation of impact.

The current number of residential active listings for this area, at the time of this report, is 85. To gauge the average number of sales occurring in this area, a report of sold residential properties from 2007 through 2011 was compiled through the Southern Black Hills Multiple Listing Service. Keep in mind this does not take into consideration the impact of investment or commercial properties. The average absorption of sold properties for the immediate areas of Hot Springs and Fall River County is 67 per year. The average price for the area is $120,550.00.

The economic recovery in housing began more than two years ago. During the years of 2009 and 2010 this area experienced a decrease of 10% in the values of residential real estate. 2011 was beginning to show an increase. With the news of the VABHHCS in December of 2011 that increase has slowed.

If this market doubled the active number of listings due to job loss and decrease in population, from 85 to 170 active listings, and the market only absorbed 67 sold homes of this inventory we would have 2/3 of our active inventory to carry over. The absorption rate of active listings would impact the supply and demand of our market and therefore more time on the market would impact prices to fall. We would greatly exceed the effective demand of the area.

Not surprisingly, this large imbalance of supply and demand would reflect in a drop in home values of historic proportions. Nationally, house prices have plunged about 30 percent in normal terms from their peak and nearly 40 percent in real or inflation-adjusted terms. Our area did uphold a drop in home values of only 10 percent due to the absorption of the supply and demand in our area.

We would predict that in the immediate area of Fall River County and Hot Springs the decrease of home values could be as high as 25% due to the new stress of an oversupply of listings due to the decrease in jobs for the area and loss of population.

1) The Southern Black Hills Association of REALTORS Multiple Listing Service.
2) Today's Housing Market, Consumer News and Advice. RISMEDIA.com

Impact on Business - Business Person Comments

The VA medical facility and campus is part and parcel to Hot Springs, Fall River County and the region. It is not simply a RIF or reduction in force; it will impact everyone from the homeowner (and property values) to the restaurant to the small business to State Veterans Home. Each parcel of the whole will see a ripple effect on the bottom line as business declines. Some businesses will go away as employees and their families move away. Businesses have already seen a downturn in business due to the announcement of the proposal. People are uneasy about the possibility of the future without the services and manpower and facilities for veterans and their families. The impact of the proposed venue would devastate economic development thus impacting the growth of the area. Again the ripple effect would take many years to overcome. In our area of many miles, we have no one (metropolitan area) to feed on and to encompass, to grow with, to partner with for sustainability. The other side of the coin is the potential for businesses and services that would grow with the enhancement of the VA medical facility and campus. The possibilities are endless.

The impact of the proposed change to VA medical facility is summed up in this statement from one of the businesses surveyed in Hot Springs: *"the negative impact to all businesses in the community would be exponential. That much revenue taken out of the local economy impacts all businesses whether or not they do business directly with VA employees and veterans or not, it's the law of economics, if some do better we all do better and vice versa".*

Hot Springs business owners were asked to answer the following question in a survey:

"The Veteran's Administration proposal reduces their employment at The Hot Springs facility by 330 positions over five years. The South Dakota Dept. of Labor estimates that an additional 123 jobs will be lost due to the ripple effect for a Total of 453 jobs lost. The Fall River County Census of 2010 reports

3000 employment positions in the County. In the next 5 years over 15 percent of these jobs could be lost. How will this impact your business?”

Complete responses to the survey are contained in Appendix C of this document. What follows are selected excerpts from those comments.

‘…we will have a flood of property for sale with desperate sellers, which will negatively affect the value of the rest of the area properties. … I may be very busy listing properties, but we won't have people to buy’

…’we will see a decrease in the number of families we see due to VA employees moving; we will not build a new office due to this fact. We have been planning on a build in the next year or so, now we are forced to forfeit those ideas.’…

…‘we have already tossed around the thought of selling our business …If the population decreases winters will be impossible to make a living and we will be forced to close our doors. Selling before the VA announces its closure… makes better financial sense and a secure future for our family.’

‘The loss of jobs … will impact every business in this town. If you lose the VA then you have less money to invest in our town, which then impacts our tourist industry, which impacts our businesses, which impacts our schools and our housing. Loss of tax dollars will most definitely affect everything.’

‘It will have a devastating effect on our businesses. I do not know if we will be able to survive a hit like that.’

… ‘I believe between the major employers in town the actual loss of jobs will be closer to 1000 including, schools, ACE, grocery stores and health care.’

… ‘I believe my revenues would be down by at least 15%, maybe down by 20%. All of my expenses would remain the same so that would be a $20-25,000 decrease in profits, not to mention the decrease in the value of the business if I wish to sell. Probably could not get it sold.’…

… 'THIS WOULD BE A TOTAL DISASTER FOR OUR COMMUNITY AND THE SURROUNDING AREA.'

'This will greatly impact an already struggling post office in a smaller community. The revenue brought in by VA and employees is a large chunk for this office. Lower revenue could result in layoffs and or hours reduction.'

The loss of 453 jobs in our community would be a big blow to the businesses in our area. In our store we could see decreases in business of 20 to 25%. This loss in business would lead to a reduction in jobs of 5-10 positions.

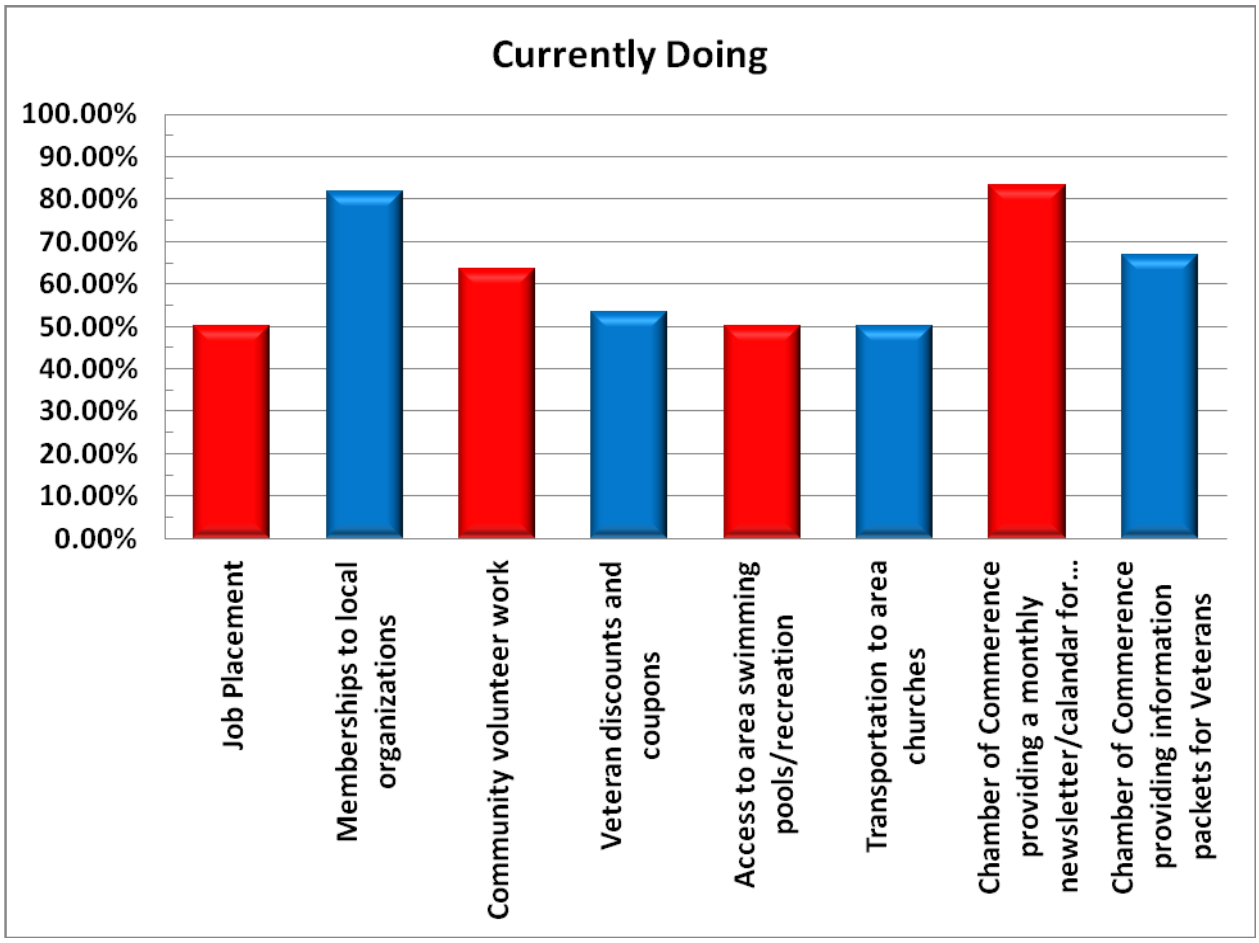
[1] 2010 LEHD State of South Dakota County Reports at http://lehd.did.census.gov/led/datatools/qwiapp.html

[2] US Census Bureau Selected Economic Characteristics (DP03) for Fall River County SD

[3] US Census Bureau Aggregate Wage or Salary Income in the Past 12 Months (B19062) for Fall River County SD

What the Business Community Can Offer VABHHC

As a Sub-Committee under the Business Community Group, we were tasked with creating a Veterans Survey and a Business Survey on topics concerning Veteran's issues. A number of areas were covered including Job Placement, veterans Discounts, Transportation, and Community Volunteer Work among others. The responses from these surveys indicated many businesses already employ veterans and veteran's Spouses. Businesses that were too small to have employees would hire them if the need arose. Surveys show during the years that the VA has been in Hot Springs, local businesses have been directly involved in the lives of our veterans, and will continue to do so.



On line survey results indicate: if opportunity presents itself Businesses and Organizations of Hot Springs are willing to do more. Hot Springs is a progressive community, striving to better serve our veterans. This statement has resulted in a symbolic relationship between the Hot Springs Business Community and veterans.

Transportation is important for the mobility of our veterans and this is being addressed by a local taxi service which adheres to veterans. Local churches provide for the spiritual needs of our veterans by arranging transport to and from their services. The Intimacy of Hot Springs promotes a cordial relationship between the veterans and the Business Community. This is witnessed by the veterans being willing to volunteer their valuable time and talents.

The Hot Springs Chamber of Commerce already distributes community packets. In an effort to better communicate activities and events, the business community thru the chamber would provide information packets and calendars to all newly arriving veterans in the Domiciliary. This would acclimate our veterans to the Hot Springs area, and show them how much we care.

In Conclusion; after evaluating the surveys we realized that we were headed in a totally different direction than what we were looking for. It wasn't just what we could do for the Veteran, but what the Veteran has done for us. Every Community needs something to call themselves complete. Without the VA and the veterans associated with our facility, we would no longer be a complete entity. We are not the only town that cares about the Veteran, but there is no town that cares more!

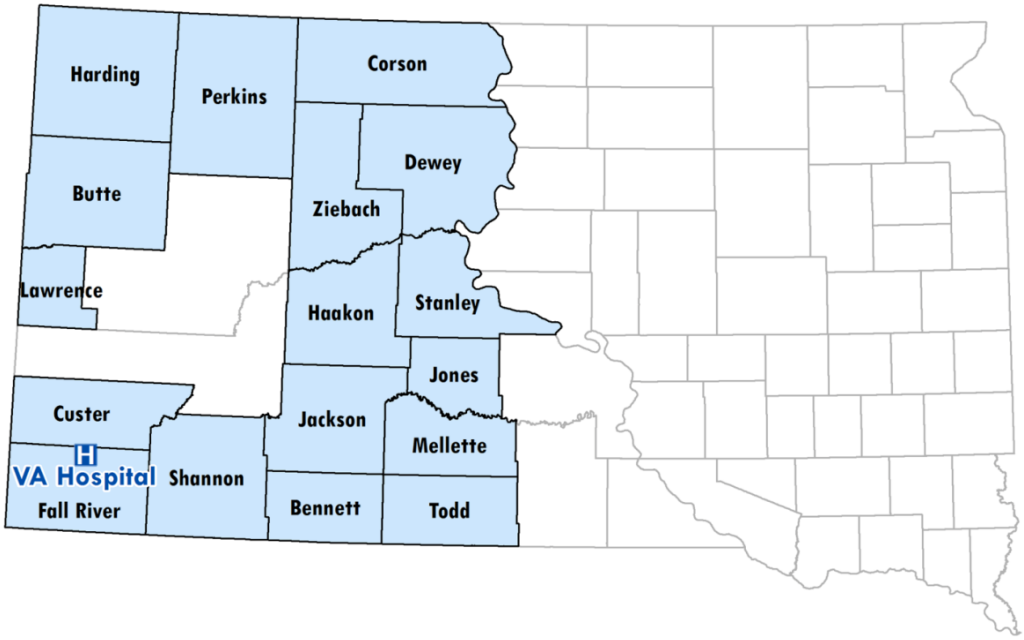
Appendix J-1

Economic Impact Analysis

Veterans Affairs Black Hills Healthcare System Hot Springs Campus

Multiple County Region in South Dakota

The study area of this impact analysis includes a multiple county region in South Dakota, including the counties of Bennett, Butte, Corson, Custer, Dewey, Fall River, Haakon, Harding, Jackson, Jones, Lawrence, Mellette, Perkins, Shannon, Stanley, Todd and Ziebach.



The estimated impact of the Veterans Affairs (VA) Hospital can be identified by the type of economic activity incurred in the region:

- Direct effects include the value of production, employment and payroll from the operations of the VA Hospital.

- Indirect effects include the value of production, employment and payroll at all local business in the region that supply goods and services purchased by the VA Hospital to support its operations.

- Induced effects include the value of production, employment and payroll resulting from local employee spending of earnings paid by the VA Hospital and all local businesses that support the company's operations.

Three separate analyses were conducted to measure the economic impact of expected reduced employment levels at the VA Hospital. The first analysis estimated the current economic impact of this establishment. The second analysis estimated the impact of the employment level being reduced by 100 workers in the year 2014. The final analysis estimated the impact of the initial employment level being reduced by 330 workers, resulting with an estimated worker level of only 55 workers in the year 2016.

Estimated Impacts For Years 2011, 2014 and 2016				
2011				
Impact Type	Direct Effect	Indirect	Induced	Total Effect
Employment	385	59	84	528
Labor Income	$20,622,524	$1,997,088	$2,488,579	$25,108,190
Output	$43,106,065	$6,505,370	$8,685,146	$58,296,581
2014				
Impact Type	Direct Effect	Indirect	Induced	Total Effect
Employment	-100	-15	-22	-137
Labor Income	($5,356,500	($518,724)	($646,384)	($6,521,609
Output	($11,196,381	($1,689,707	($2,255,882	($15,141,970
2016				
Impact Type	Direct Effect	Indirect	Induced	Total Effect
Employment	-330	-51	-72	-453
Labor Income	($17,676,450	($1,711,791	($2,133,068	($21,521,309
Output	($36,948,054	($5,576,034	($7,444,411	($49,968,500

Top Ten Industries Impacted 2016					
			Labor	Value	
397	Private hospitals	-	($17,849,56	($18,703,21	($37,327,42
413	Food services and drinking places	-12.3	($191,826	($281,505	($644,414
360	Real estate establishments	-7.0	($215,902	($994,253	($1,320,094
	Medical and diagnostic labs and outpatient and other ambulatory care				
382	Employment services	-6.1	($112,512	($121,810	($179,532
319	Wholesale trade businesses	-4.4	($177,427	($302,564	($467,954
324	Retail Stores - Food and beverage	-3.9	($93,274	($141,120	($226,541
	Offices of physicians, dentists, and				
	Automotive repair and maintenance,				
398	Nursing and residential care facilities	-3.2	($91,018	($94,349	($138,480

Note: Impacts may not sum to total due to rounding. All effects are expressed in 2011 dollars on an annual average basis. Employment includes both full-time and part-time jobs.

Prepared by Labor Market Information Center, SD Department of Labor and Regulation, December 2011.

Appendix J-2

VA Employee Data

The VA made available to the Save the VA group a list of all employees and their pay grades. This list was used to calculate total wages, average wages and place of residence for all current VA employees.

Total employee count from this list is 393. Note that this is a slight variance from the 385 contained in the VA proposal. This is probably due to taking the count at different points in time.

Government wage tables are public and it was a simple matter to cross reference employee pay grades to the corresponding salary and then calculate average wage and total wages. Total yearly wages of all VA employees is $20,971,465. Average salary is $53,363.

The VA was not able to release employee residence data so this data had to be created and so must be considered as projected residences but should be very accurate projections. Members of the save the VA group were very familiar most of the names on the list and place of residence of 268 of the employees were know. Of the remaining 125 names 99 were easily found using internet based research, primarily whitepages.com. This left only 26 names whose residences were completely unknown. The author looked at the percentages of known employees living in each of the surrounding communities and, assuming that the unknown employees would be geographically scattered in roughly the same areas, used those percentages to project where the unknown 26 employees most likely lived. Following are tables of the projected town and county of residence for the 393 VA employees.

County	Employee Count	Percent of Total
Fall River	329	83.65%
Custer	35	8.99%
Pennington	26	6.54%
Shannon	2	0.54%
Mellete	1	0.27%

Town	Employee Count	Percent of Total
Buffalo Gap	11	2.72%
Custer	21	5.18%
Edgemont	16	4.09%
Fairburn	2	0.54%
Hill City	1	0.27%
Hot Springs	292	74.11%
Keystone	1	0.27%
Oelrichs	6	1.63%
Oral	13	3.27%
Pine Ridge	2	0.54%
Pringle	2	0.54%
Rapid City	24	5.99%
Smithwick	2	0.54%
White River	1	0.27%

Appendix J-3

Individual Business Person Comments

A poll of Hot Springs businesses was done by hand delivering surveys, advertising the survey in the local paper Chamber of Commerce Enewsletter and distributing the survey at local events. Responses were received via an online website where the survey was available, by dropping the survey off at the local newspaper or Chamber of Commerce office and by direct mail.

Following is the question business people were asked to respond to:

> The Veteran's Administration proposal reduces their employment at The Hot Springs facility by 330 positions over five years. The South Dakota Dept. of Labor estimates that an additional 123 jobs will be lost due to the ripple effect. For a Total of 453 jobs lost. The Fall River County Census of 2010 reports 3000 employment positions in the County. In the next 5 years over 15 percent of these jobs could be lost. How will this impact your business?

Following are responses:

- The newspaper business is only successful if the area business community is successful due to our high reliance on advertising revenue to survive. As the population decreases due to lack of jobs, so will our advertising base, as well as subscription base.
- the loss of jobs will have a negative impact on our local economy which will impact every business in this town. If you lose the VA then you have less money to invest in our town, which then impacts our tourist industry, which impacts our businesses, which impacts our schools and our housing. Loss of tax dollars will most definitely affect everything.
- It won't Hot Springs is dying!
- most of the businesses will close town will go down hill
- I work in retail sales and the loss of those jobs would affect me greatly. I would likely have to look at what I stocked in inventory and cut back as warranted.
- As a hotel owner, I will lose approx. $5,000 from rooms not rented to veterans coming for eye surgery
- A retail business typically runs on a less then 10% profit margin. A 15% cut in sales doesn't cut profits, it eliminates them. If we have a 15% cut in sales I might be able to

remain profitable but I would have to make cuts and it would be very difficult to maintain cash flow, IE pay my loans. If the cut in sales gets much more then 15% it would be nearly impossible to stay in business. Most of my expenses are fixed so the places I can cut are in things like donations and work force. A 15% sales decrease would probably mean a 15 to 20 % cut in a workforce of 15. These folks would not get early retirements or paid transfers to new jobs like the 350 VA employees. I fear that our sales will drop a lot more then 15%. The VA jobs are the best paying jobs in town and these people probably represent a disproportionatlely large part of our sales. I think it's ridiculous that the VA could come out with this proposal without having given us some kind of professionally done economic impact analysis that would help the business owners plan for the future.

- As a Realtor, the problem I foresee is that we will have a flood of property for sale with desperate Sellers, which will negatively affect the value of the rest of the area properties. Our business district will suffer with the sudden drop in population and our town may not be able to survive! As a Realtor, I may be very busy listing properties, but we won't have people to Buy.
- It will be devastating.
- Spouse of VA employee will be forced to move as well. We will see a decrease in the number of families we see due to VA employees moving, we will not build a new office due to this fact. We have been planning on a build in the next year or so, now we are forced to forfeit those ideas. That would have given more jobs to local businesses.
- It will have a devastating effect on our businesses. I do not know if we will be able to survive a hit like that.
- As a motel, we house a number of vets each week who are here to be seen at the VA. If our revenue drops, we will have no choice but to lay off staff.
- Many veterans purchase homes in Hot Springs to be close to the VA. The influx will likely cease if the VA moves and some of those who have already purchased may choose to sell their homes creating a glut of homes on the market.
- Our business probably will not be affected by job loss because we do not see locals coming out to camp in our campground. We will however see a loss in the number of vets coming to the area for their VA appointments as a lot of vets stay in their campers at our campground when here for their medical needs.
- It would significantly affect our business as we are dependent on people with good jobs and good benefits for our success also. I would expect to see a similar number of 15 percent decrease in our numbers.
- Long term like other business owners the loss of clients will result in loss of employment for my employees. I believe between the major employers in town the actual loss of jobs will be closer to 1000 including, schools, ACE, grocery stores and health care.
- Honestly we have already tossed around the thought of selling our business now. If the VA closes it will have an ominous affect on our livelihood. We are not only losing the

people whose jobs are eliminated but we will lose entire families from the area. It is hard to make ends meet in the winter with the population we have already. If the population decreases winters will be impossible to make a living and we will be forced to close our doors. Selling before the VA announces its closure (hopefully they decided against this) makes better financial sense and a secure future for our family.

- I am a service business. I believe my revenues would be down by at least 15%, maybe down by 20%. All of my expenses would remain the same so that would be a $20-25,000 decrease in profits, not to mention the decrease in the value of the business if I wish to sell. Probably could not get it sold. Who wants to move to a dieing community?
- SERIOUSLY....THIS WOULD BE A TOTAL DISASTER FOR OUR COMMUNITY AND THE SURROUNDING AREA.
- We insure a good percentage of this town. If our town shuts down then so does our business.
- If the population of Hot Springs decreases, that will have a direct, negative impact on our business
- So far with the down sizing of the V.A. we have noticed a decline in business from the from VA employees.
- We won't have Doctors staying at our hotel for visits to the VA.
- Possible reduction in staff/wages/benefits, possible reduction in services and community support.
- This will greatly impact an already struggling post office in a smaller community. The revenue brought in by VA and employees is a large chunk for this office. Lower revenue could result in layoffs and or hours reduction.
- The loss of 453 jobs in our community would be a big blow to the businesses in our area. In our store we could see decreases in business of 20 to 25%. This loss in business would lead to a reduction in jobs of 5-10 positions.
- The negative impact to all businesses in the community would be exponential. That much revenue taken out of the local economy impacts all businesses whether or not they do business directly with VA employees and veterans or not, it's the law of economics, if some do better we all do better and vice versa.
- This would take roughly 35% of my client base from my shop, this would not fair well on a one person business.

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Appendix C

NEPA / NHPA Substitution Process

- Checklist for Substitution, NEPA and NHPA Handbook for Integrating NEPA and Section 106
- VA BHHCS Letter and Mailing List (May 13, 2014): Notification of NEPA/NHPA Integration
- VA BHHCS Letter (October 9, 2014): Section 106 Consultation
- VA BHHCS Letters (4) (January 15, 2015): Consulting Party Participation
- VA Office of Public and Intergovernmental Affairs Letter and Mailing List (August 2014): Native American Consultation
- Summary of Consulting Parties Workshop (November 18-19, 2014)
- Summary of Consulting Parties Workshop (February 12, 2015)
- Consulting Parties Teleconference Notes (April 27, 2015)

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ATTACHMENT C
CHECKLIST FOR SUBSTITUTION

This checklist was developed by the Advisory Council on Historic Preservation (ACHP) as a guide for those preparing or reviewing a NEPA document – Environmental Impact Statement (EIS) or Environmental Assessment (EA) – used for Section 106 purposes in accordance with Section 800.8(c) of the Section 106 implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). The checklist is based on the standards for developing environmental documents to comply with Section 106 at 36 C.F.R. § 800.8(c)(1). Ideally, the preparer or reviewer will be able to answer "yes" to all items.

NOTIFICATION	YES	NO	COMMENTS
Did the agency notify *in advance* the SHPO/THPO and the ACHP of its intent to use the NEPA process for Section 106 purposes?	X		Section 6.2.1 Notification
Is the notification correspondence included in the EA/DEIS or appendices?	X		Appendix C - NEPA/NHPA Substitution Process
IDENTIFICATION OF CONSULTING PARTIES	**YES**	**NO**	**COMMENTS**
Is the effort to identify consulting parties described in the EA/DEIS?	X		Section 6.2.2 Identification of Consulting Parties
Is a list of the consulting parties provided in the EA/DEIS?	X		Section 6.2.2 Identification of Consulting Parties
Are all consulting parties included? (Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties)	X		Section 6.2.2 Identification of Consulting Parties Appendix C - NEPA/NHPA Substitution Process Section 6.2.3 Native American Consultation
Has the agency reviewed and responded to all requests to be consulting parties? Has the agency documented the exchange in its administrative record?	X		Section 6.2.2 Identification of Consulting Parties Appendix C - NEPA/NHPA Substitution Process Correspondence, outreach documentation in Administrative Record
IDENTIFICATION OF HISTORIC PROPERTIES	**YES**	**NO**	**COMMENTS**
Is the effort to identify historic properties of all types (buildings, structures, objects, districts, and sites) described, including the Area of Potential Effects and the methodology for investigation? If no, has the agency disclosed its intent to phase the identification and assessments?	X		Section 3.3.2 Cultural Resource and Historic Property Identification; Section 3.3.3 Areas of Potential Effects for Historic Properties; Section 3.3.5.1 Cultural Resources in Hot Springs APE; Section 3.3.5.2 Cultural Resources in Rapid City APE; 3.3.6 Phased Identification and Evaluation of Historic Properties
Is the effort to identify historic properties commensurate with the assessment of other environmental factors?	X		Section 3.3 Cultural Resources in relation to other resources sections in Chapter 3
Are determinations of eligibility for the National Register of Historic Places (NRHP) clearly stated?	X		Section 3.3.5.1 Cultural Resources in Hot Springs APE; Section 3.3.5.2 Cultural Resources in Rapid City APE; Section 3.3.5.1.1 Hot Springs Historic District; Section 3.3.5.1.2 Battle Mountain Sanitarium NHL
Can a layman understand the characteristics of each historic property and why it is significant (eligible for the NRHP) and retains integrity?	X		Section 3.3.5.1 Cultural Resources in Hot Springs APE; Section 3.3.5.2 Cultural Resources in Rapid City APE; Section 3.3.5.3 Historic Properties of Religious and Cultural Significance; Section 3.3.5.1.1 Hot Springs Historic District; Section 3.3.5.1.2 Battle Mountain Sanitarium NHL

ASSESSMENT OF EFFECTS	YES	NO	COMMENTS
Has one of the following Section 106 effect findings for the undertaking been clearly stated? - No historic properties affected - No historic properties adversely affected - Historic properties adversely affected	X		Sections 4.3.3 through 4.3.9
If adverse effects may result, is the application of the criteria of adverse effect described?	X		Section 4.3.2 Assessment Methodology; Section 4.3.2.2 Types of Adverse Effects on Historic Properties; Sections 4.3.3 through 4.3.9
Was all of the above information presented during scoping meetings and/or other public and stakeholder outreach?	X ongoing		Appendix C - NEPA/NHPA Substitution Process, Section 106 Consultation Workshop Summaries Section 6.1.3 Draft EIS Comment Period
CONSULTATION AND PUBLIC INVOLVEMENT	**YES**	**NO**	**COMMENTS**
Is the SHPO/THPO concurrence with eligibility determinations documented? Is the documentation included in the document and appendices?	X		Section 3.3.5.1 Cultural Resources in Hot Springs APE; Section 3.3.5.2 Cultural Resources in Rapid City APE; Section 3.3.5.1.1 Hot Springs Historic District; Section 3.3.5.1.2 Battle Mountain Sanitarium NHL
Is the SHPO/THPO concurrence with the Section 106 effect finding documented? Is the correspondence included?			Pending SHPO review of Draft EIS
Has an adequate opportunity for consulting with the SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties been provided prior to the release of the DEIS/EA? Is all relevant documentation (subject to confidentiality) included?	X		Section 6.1.1 Scoping Section 6.2.3 Consultation on Effects to Historic Properties Section 6.3 Native American Consultation Appendix C - NEPA/NHPA Substitution Process
Do any of the consulting parties substantively disagree with the agency's determinations of eligibility or findings of effect? If so; is the process for seeking agreement on those issues disclosed?			To be determined
If a National Historic Landmark (NHL) may be affected by the undertaking, has the agency notified the National Park Service (pursuant to 36 C.F.R. § 800.10(c)) and invited its participation where there may be an adverse effect? Is all relevant correspondence included?	X		Section 6.2.2 Identification of Consulting Parties Appendix C - NEPA/NHPA Substitution Process Correspondence in Administrative Record
Does the document cover sheet or distribution letter clearly indicate that the DEIS/EA also documents the Section 106 process?	X		Draft EIS Cover Abstract
Have historic preservation concerns expressed by members of the public been addressed? If appropriate, have such commenters been invited to be consulting parties in the Section 106 review?	X ongoing		Section 6.1.1.4 Scoping Summary; Section 6.2.2 Identification of Consulting Parties; Section 6.1.3 Draft EIS Comment Period; Section 4.3 Cultural Resources and Historic Properties; Appendix C - NEPA/NHPA Substitution Process
Have the scoping notices and other public meeting notices included information about Section 106?	X ongoing		Section 6.1.1 Scoping Section 6.1.3 Draft EIS Comment Period Appendix B - Scoping Summary

DEVELOPMENT OF ALTERNATIVES OR MEASURES TO AVOID, MINIMIZE, OR MITIGATE ADVERSE EFFECTS	YES	NO	COMMENTS
Is the development and evaluation of alternatives or modifications that could avoid or minimize adverse effects to historic properties documented?	X		Chapter 2 Alternatives; Sections 4.3.3 through 4.3.9; Section 5.2 Resolution of Adverse Cultural Resources Effects
Where appropriate have mitigation measures been proposed?	X		Section 5.2 Resolution of Adverse Cultural Resources Effects
Is the consultation with SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties about avoidance, minimization, or mitigation measures documented? Is all relevant documentation (subject to confidentiality) included in the EA/DEIS or appendices?	X ongoing		Section 5.2 Resolution of Adverse Cultural Resources Effects Appendix C - NEPA/NHPA Substitution Process
STEPS TO CONCLUSION	**YES**	**NO**	**COMMENTS**
Is there a potential for the preferred alternative to adversely affect at least one historic property? If no, Section 106 is complete if no objections are raised by the SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, other consulting parties, or the ACHP. Is the final Section 106 finding documented?	X ongoing		Section 2.6 Preferred Alternative Section 4.3.3 Alternative A
If the preferred alternative could adversely affect historic properties, is one of the following strategies for completing the Section 106 process identified? - Execution of a Memorandum of Agreement or a Programmatic Agreement - Incorporation of the binding commitment to mitigation measures in the Record of Decision - Termination, formal ACHP comments pursuant to 36 C.F.R. § 800.7, and response by head of the agency	X		Section 5.2.2 Measures to Avoid, Minimize, or Mitigate Adverse Effects
If incorporating binding commitment to mitigation measures in the ROD, does the ROD include the following: - Commitments clearly identifying who will do what by when - Administrative provisions including: - Process for continued consultation during implementation (for example, regarding design review, data recovery, development of mitigation products) - Deadlines/timelines for implementation - Post-review discoveries - Dispute resolution process - Contingency for changes to the undertaking referencing 36 C.F.R. § 800.8(c)(5)			Record of Decision pending
IMPLEMENTATION	**YES**	**NO**	**COMMENTS**
Is the agency prepared to carry out the commitments made in: - Memorandum of Agreement or a Programmatic Agreement, - Record of Decision, or - Response by head of the agency to formal ACHP comments following termination?			Record of Decision Pending

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

May 13, 2014

«Courtesy Title» «First Name» «Last Name»
«Job Title»
«Company»
«Address 1»
«City», «State» «Postal Code»

Dear «Courtesy Title» «Last Name»:

Since December 2011, VA Black Hills Health Care System (VA BHHCS) has been engaged in discussions with Veterans and other stakeholders regarding proposed changes in the delivery of high-quality health care for Veterans in the VA BHHCS service area. Many changes have been proposed, but no decisions have been made at this time. VA is now preparing an integrated Environmental Impact Statement (EIS) regarding the proposed reconfiguration in accordance with the National Environmental Policy Act (NEPA). The EIS will include a comprehensive analysis of the potential environmental, cultural and historic, and socioeconomic effects of the proposed reconfiguration of health care services. A contract for EIS support will be utilized to prepare the EIS.

The proposed reconfiguration of VA BHHCS, summarized in Attachment 1, involves changes in how health care is delivered in Hot Springs, SD and the surrounding areas as well as shifting resources to service area population centers. VA BHHCS recognizes that such changes may have an impact on the Hot Springs medical center campus, which is a National Historic Landmark (NHL), as well as a future Rapid City, SD location. In May 2012, VA BHHCS initiated consultation under Sections 106 and 110(f) of the National Historic Preservation Act (NHPA) to consider ways of identifying and avoiding, minimizing, or mitigating such impacts.

EIS/NHPA Support Contractor Selection:

VA has contracted with Labat Environmental, Inc. to support the environmental impact analysis process. Labat Environmental is a multi-disciplinary environmental consulting firm and a Service Disabled Veteran Owned Small Business. They have over 30 years of experience in environmental management, consultation, and compliance and have provided expert environmental and historic preservation support services to many Federal agencies, including VA.

EIS Notice of Intent:

The Notice of Intent (NOI) formally initiating the EIS process will soon be published in the Federal Register. Following publishing of the NOI, VA and Labat Environmental will begin the EIS process with public scoping meetings. The meeting schedule will be posted on our website and notices will be provided to the media.

NEPA/NHPA Integration:

In part because the cultural, historic, and natural environmental elements of the Black Hills area are so interrelated, we have chosen to integrate the NHPA Section 106 consultation procedures into the NEPA environmental impact analysis process using an option formally known as substitution. A more common option is to coordinate the NHPA Section 106 compliance separately but in parallel with the broader NEPA process. However, 36 CFR 800.8(c) of the NHPA grants Federal agencies the latitude to use the substitution option in accordance with the provisions in the Section 106 regulations if they choose. This approach is consistent with the March 2013 report, NEPA and NHPA: A Handbook for Integrating NEPA and Section 106, issued by the Advisory Council on Historic Preservation (ACHP) and Council on Environmental Quality (CEQ). Finally, substituting the NEPA process implements the direction found in Presidential Executive Order 13563, Improving Regulation and Regulatory Review, issued in January 2011.

Reengaging consultation:

VA is now reengaging consultation with all appropriate consulting parties (including the ACHP, National Trust for Historic Preservation, National Park Service, State Historic Preservation Office, Native American Tribes, and federal, state and local governmental officials). It is important to engage in consultation early, in conjunction with the start of the EIS, when a wider range of alternatives is open for consideration.

Your organization was identified as a potential consulting party and invited to participate in May 2012. We want to be sure that we have involved all potential consulting parties; please examine the list of the parties (Attachment 2) that we have identified. If you are aware of additional parties that you believe should be invited to consult, we would appreciate knowing of them.

For your information, the proposed improvements to VA BHHCS as well as information specific to the EIS or Section 106 and 110(f) consultation process can be found online at http://www.blackhills.va.gov/VABlackHillsFuture/.

We welcome your participation in our efforts to identify and consult on potential impacts as well as preserve our National Historic Landmark and other potentially affected historic properties as we prepare for the future of Veteran health care. Additional questions may be directed to Luke Epperson, Administrative Officer to the Office of the Director at vablackhillsfuture@va.gov or 605-720-7170.

Sincerely,

Stephen R. DiStasio
Director

Attachments (2)

Attachment 1

The driving factor that led to the proposals is our need to deliver safe, quality health care. We also want to decrease travel times for Veterans and their family members. We know that in the coming years, the Veteran population in our area will continue to decline. The more prepared we are for the future, the better we can assure the quality and safety of Veteran health care.

Below is a summary of the proposed changes:

- **Opening a new Hot Springs Community Based Outpatient Clinic either co-located with the Fall River Hospital, the State Veterans Home or at a free-standing site.** This VA-staffed clinic would provide the same outpatient care Veterans currently receive, but in a modern, more efficient building for providing health care, primary care, mental health, and limited specialty care. We want to continue to provide dialysis and would like to purchase pharmacy, laboratory and x-ray services at the Fall River Hospital.

- **A phased plan would be implemented to close the VA Hot Springs inpatient and nursing home units, operating rooms, and urgent care facilities.** VA would buy the care from providers in Hot Springs and in your local communities. The goal is to make health care, especially specialty care, more accessible, and save Veterans long-distance travel. VA nurses will be helping manage Veterans' care between VA and non-VA providers.

- **Building a new Residential Rehabilitation Treatment Program facility (also known as the Domiciliary) in Rapid City.** This new structure would be designed to meet modern health care standards and help us better accommodate disabled Veterans, more female Veterans, and Veterans with children. Veterans would benefit from increased access to job training and job sites, state-of-the-art home-like facilities, educational opportunities, housing options following treatment, and other community services. This new facility would allow VA to phase out use of the Hot Springs Domiciliary which is out of compliance with the Americans with Disabilities Act (ADA).

- **Services in Rapid City would be enhanced by expanding the VA Community Based Outpatient Clinic.** Expansion in Rapid City would take care of more Veterans and would also provide x-ray, lab, pharmacy and physical therapy services - allowing VA to provide more services where more Veterans live.

- **Enhance services at the Fort Meade VA Medical Center by building new operating rooms and renovating the inpatient medical/surgical/intensive care units.**

Attachment 2

Potential Consulting Parties
(Listed in alphabetical order)

1) Advisory Council for Historic Preservation Representative
2) AFGE Local 1539 President
3) Area Tribal Leadership Representative
4) Black Hills Historic Preservation Trust Representative
5) City of Hot Springs: Mayor, City Council, Chamber of Commerce Representative
6) Department of the Interior: National Park Service
7) Department of Veterans Affairs: Historic Preservation Office—VISN 23 Midwest Health Care Network—Black Hills Health Care System—Black Hills National Cemetery
8) Fall River County, SD Representatives: Historical Society, County Commissioner and School District
9) Hot Springs CLG Historic Preservation Commission Representative
10) Local "Save the VA" Representative
11) National American Indian Veterans, Inc. Representative
12) National Trust for Historic Preservation Representative
13) Preserve South Dakota Representative
14) South Dakota Historical Society Representative
15) South Dakota - Office of the Governor
16) South Dakota State Historic Preservation Office Representative
17) South Dakota State Legislators—District 30
18) State Veterans Service Organization Leadership Representatives: Nebraska, South Dakota, Wyoming
19) U.S. Senators and Representatives from South Dakota, Nebraska and Wyoming
20) Other attendees of May 31, 2012 consultation meeting

MAILING LIST - EIS NOI

Last Name	First Name	Title 1	Title 2	Organization	Address	City	State	Zip
Murphy	Janet	Ms.	Network Director	VA Midwest Health Care Network	2805 Dodd Rd. Suite 250	Eagan	MN	55121
Julius	Steven	Dr.	Chief Medical Officer	VA Midwest Health Care Network	2805 Dodd Rd. Suite 250	Eagan	MN	55121
Yakowicz	Peter	Mr.	Capital Assets Manager	VA Midwest Health Care Network	2805 Dodd Rd. Suite 250	Eagan	MN	55121
Enzi	Michael	Senator	U.S. Senator	State of Wyoming	400 S. Kendrick, Suite 303	Gillette	WY	82716
Barrasso	John	Senator	U.S. Senator	State of Wyoming	PO Box 22202	Casper	WY	82602
Lummis	Cynthia	Representative	U.S. Representative	State of Wyoming	PO Box 44003	Casper	WY	82602
Barttelbort	Larry	Mr.	Director	Wyoming Veterans Commission	5500 Bishop Blvd	Cheyenne	WY	82009
Yeager	Brian	Mr.	State Veterans Service Officer	Powder River Basin - State of WY	551 Running W Drive	Gillette	WY	82718
Johnson	Tim	Senator	U.S. Senator	State of South Dakota	405 E. Omaha St., Suite B	Rapid City	SD	57701
Thune	John	Senator	U.S. Senator	State of South Dakota	1313 W. Main Street	Rapid City	SD	57701
Noem	Kristi	Representative	U.S. Representative	State of South Dakota	343 Quincy Street	Rapid City	SD	57701
Gaspar	LaVonne	Ms.	Interim Superintendent	Michael J. Fitzmaurice Veterans Home	2500 Minnekahta Ave	Hot Springs	SD	57747
Zimmerman	Larry	Secretary	Secretary	South Dakota Department of Veterans Affairs	2525 W Main Street - 303A - Suite #4	Rapid City	SD	57702
Hubbard	Wade	Mr.	Chairman	South Dakota State Veterans Commission	401 N. Grand Avenue	Pierre	SD	57501
McDonald	Rick	Mr.	Commander	South Dakota American Legion	14 1st Ave., SE, PO Box 67	Watertown	SD	57201
Brenden	Denny	Mr.	Adjutant	South Dakota American Legion	14 1st Ave., SE, PO Box 67	Watertown	SD	57201
Parr	Helen	Ms.	Commander	South Dakota DAV	1519 W 51st Street	Sioux Falls	SD	57105
Laughlin	Ken	Mr.	Adjutant	South Dakota DAV	1519 W 51st Street	Sioux Falls	SD	57105
Couch	Darold	Mr.	Commander	South Dakota VFW	3601 S. Minnesota Avenue	Sioux Falls	SD	57105
Barg	Rick	Mr.	Adjutant/Quartermaster	South Dakota VFW	3601 S. Minnesota Avenue	Sioux Falls	SD	57105
Paulsen	Terry	Mr.	Government Relations Director	South Dakota PVA-North Central Chapter	209 N. Garfield	Sioux Falls	SD	57104
Daugaard	Dennis	Governor		State of South Dakota	500 East Capitol Avenue	Pierre	SD	57501
Michels	Matt	Lt. Governor		State of South Dakota	500 East Capitol Avenue	Pierre	SD	57501
Rampelberg	Bruce	Senator	South Dakota Senate	South Dakota District 30	13948 Lariat Road	Rapid City	SD	57702
Russell	Lance	Representative	South Dakota House	South Dakota District 30	1938 Lincoln Avenue	Hot Springs	SD	57747
Verchio	Mike	Representative	South Dakota House	South Dakota District 30	PO Box 205	Hill City	SD	57745
Fischer	Deb	Senator	U.S. Senator	State of Nebraska	1110 Circle Drive, Suite F2	Scottsbluff	NE	69361
Johanns	Mike	Senator	U.S. Senator	State of Nebraska	115 Railway Street, Suite C102	Scottsbluff	NE	69361
Smith	Adrian	Representative	U.S. Representative	State of Nebraska	1811 West Second Street, Ste 105	Grand Island	NE	68803
Vogt	Jay	Mr.	Director	State Historical Society	900 Governors Drive	Pierre	SD	57501
Nelson	Chris	Mr.	West River HPO	State Historic Preservation Office	900 Governors Drive	PIerre	SD	57501
Meeks	Stephanie	Ms.	Chief Exec. Officer	National Trust for Hist. Preservation	2600 Virginia Avenue, Suite 1000	Washington	DC	20037
Buddenborg	Jennifer	Ms.	Field Officer Denver office	National Trust for Hist. Preservation	1420 Ogden St. Suite 203	Denver	CO	80218
Cole	Amy	Ms.	Director Denver office	National Trust for Hist. Preservation	1420 Ogden St. Suite 203	Denver	CO	80218
Tillisch	Skip	Mr.	President	Black Hills Historical Preservation Trust	12066 Deerfield Road	Hill City	SD	57745
				Preserve South Dakota	PO Box 267	Pierre	SD	57501
Archambault II	Dave	Chairman	Chairman	Standing Rock Sioux Tribe	PO Box D	Fort Yates	ND	58538
Hill	Manaja		Tribal Veteran Service Officer	Standing Rock Sioux Tribe	PO Box D	Fort Yates	ND	58538
Win Young	Wast'e		Tribal HPO	Standing Rock Sioux Tribe	PO Box D	Fort Yates	ND	58538
Brewer	Brian	Chairman	President	Oglala Sioux Tribe	PO Box 2070	Pine Ridge	SD	57770
Adams	Alton		Tribal Veteran Service Officer	Oglala Sioux Tribe	PO Box 211	Pine Ridge	SD	57770
Catches Enemy	Mike		Tribal HPO	Oglala Sioux Tribe	PO Box 419	Pine Ridge	SD	57770
Keckler	Kevin	Chairman	Chairman	Cheyenne River Sioux Tribe	PO Box 590	Eagle Butte	SD	57625
Dunsmore	Robert		Tribal Veteran Service Officer	Cheyenne River Sioux Tribe	PO Box 590	Eagle Butte	SD	57625
Vance	Steve		Tribal HPO	Cheyenne River Sioux Tribe	PO Box 590	Eagle Butte	SD	57625
Scott	Cyril	Chairman	Chairman	Rosebud Sioux Tribe	PO Box 430	Rosebud	SD	57570
Morrison	Orlando		Tribal Veteran Service Officer	Rosebud Sioux Tribe	PO Box 720	Rosebud	SD	57570

Arcoren	Kathy		Director	Rosebud Sioux Historical Preservation Office	PO Box 658	Rosebud	SD	57570
Eagle Bear	Russell		Tribal Historic Preservation Officer	Rosebud Sioux Tribe	PO Box 658	Rosebud	SD	57570
Members			City Council	City of Hot Springs	303 N. River St.	Hot Springs	SD	57747
Haden	Scott	Mr.	Exec. Director	HS Chamber of Commerce	P.O. Box 342	Hot Springs	SD	57747
Commissioners			County Commission	Fall River County	906 N. River	Hot Springs	SD	57747
Russell	Patrick	Mr	President	AFGE Local 1539	500 N. 5th St	Hot Springs	SD	57747
Campbell	Amanda	Ms.	Spokesperson/Historic	"Save the VA"	2308 Washington Ave.	Hot Springs	SD	57747
Loundner	Donald	Mr.	National Commander	National American Indian Veterans	35157 Weiss Road	Walker	LA	70785
			Director	Black Hills National Cemetery	20901 Pleasant Valley Drive	Sturgis	SD	57785
Crawford	Brian	Mr.	Chairman	Hot Springs Historic Preservation Comm.	303 N. River St.	Hot Springs	SD	57747
Sanders	Peggy	Mrs.	Member	Fall River County Historical Society	906 N. River	Hot Springs	SD	57747
Sanford	Dena	Ms.	Architectural Historian	National Park Service	301 River Road	Harrison	NE	69346
Davila	Vidal	Mr.	Superintendent	Wind Cave/NPS	26611 U.S. Highway 385	Hot Springs	SD	57747
Durbin	Jeffrey	Mr.	Sec. 106 Compliance Officer	WASO/ NPS	1201 I St. NW 7th floor	Washington	DC	20005
Bruckner	Dave	Mr.	Commander	Nebraska American Legion	PO Box 5205	Lincoln	NE	68505
Salak	David	Mr.	Adjutant	Nebraska American Legion	PO Box 5205	Lincoln	NE	68505
Hagel	Virgil	Mr.	Commander	Nebraska DAV	2533 N 83rd Street	Lincoln	NE	68507
Shuey	Jim	Mr.	Adjutant	Nebraska DAV	2533 N 83rd Street	Lincoln	NE	68507
Schlender	Harold	Mr.	State Commander	Nebraska VFW	PO Box 4552	Lincoln	NE	68504
Hilgert	John	Mr.	Director	Nebraska Department of Veterans Affairs	PO Box 95083	Lincoln	NE	68509
Vazquez	Amanda	Ms.	Government Relations Director	Paralyzed Veterans of America-Great Plains Chapter	7612 Maple Street	Omaha	NE	68134

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

October 9, 2014

«AddressBlock»

RE: Proposed VA Black Hills Health Care System Services Reconfiguration – Section 106 Consultation

«GreetingLine»

The U.S. Department of Veterans Affairs (VA) has proposed to reconfigure the delivery of health care services across the VA Black Hills Health Care System (VA BHHCS) service area. VA is preparing an integrated environmental impact statement (EIS) to evaluate the environmental effects this proposal may have. The EIS will integrate the implementation and review procedures of Section 102 of the *National Environmental Policy Act* (NEPA) with consultation under Section 106 of the *National Historic Preservation Act* (NHPA). The purpose of this letter is to provide an update on the NHPA Section 106 consultation process.

During the EIS scoping period (May 16 to August 16, 2014), comments on a range of issues, including historic resources, were submitted by letter, email, and web-based forms; and in both written and verbal comments at ten public meetings. Attendees at these scoping meetings were invited to submit written requests to the VA to be considered as a consulting party[1] under Section 106 of NHPA. The VA has now developed the following preliminary list of consulting parties with whom consultation on effects to historic properties will be conducted. This list may be modified as consultation proceeds.

Consulting Parties:

- Advisory Council on Historic Preservation
- South Dakota State Historical Society/State Historic Preservation Office
- Wyoming State Historic Preservation Office
- Department of the Interior–National Park Service, Midwest Regional Office
- Fall River County, South Dakota–County Commission
- City of Hot Springs
- National Trust for Historic Preservation
- Save the VA
- Oglala Sioux Tribe
- Northern Arapahoe Tribe
- Kiowa Tribe of Oklahoma

[1] In addition to the state historic preservation officer(s), tribal representatives, local government representatives, additional consulting parties are "Certain individuals and organizations with a demonstrated interest in the undertaking… [who] may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effect on historic properties" (36 CFR 800.2).

- additional tribal governments (follow-up contacts in progress)

In accordance with 36 CFR 800.2(d), the VA is also seeking and considering the views of the public "in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties, confidentiality concerns of private individuals and businesses, and the relationship of the Federal involvement to the undertaking." The 90-day public scoping period provided multiple avenues and opportunities for the public to communicate their views and concerns related to historic properties and cultural resources effects, among other issues. The public will be invited to review the status of the proposal alternatives in late 2014, and comment on the analysis of effects to historic resources from the proposed action and alternatives in the published Draft EIS in 2015. The published Final EIS will address comments on the Draft EIS analysis, with the analysis revised as needed, prior to the VA's decision on this proposal. All recipients of this letter have also been added to the mailing list for the integrated NEPA/Section 106 process, and will receive postcard notification of future public meetings and the availability of the Draft EIS, Final EIS, and Record of Decision.

The VA BHHCS website (www.blackhills.va.gov/VABlackHillsFuture/) has and will continue to provide periodic updates and access to documents throughout this integrated NEPA/Section 106 process. A summary and schedule of the milestones for the integrated NEPA/Section 106 process is attached, for your reference.

If you have any questions regarding the list of consulting parties or concerns about the historic properties consultation process, please send an email to vablackhillsfuture@va.gov, or a letter to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Road, Fort Meade, SD 57741.

Sincerely,

Stephen R. DiStasio
Director

Attachment (1)

«CC»
«CC1»
«CC2»
«CC3»

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

January 15, 2015

VFW
Lester Zimiga, Representative
13111 Wild Turkey Lane
Hot Springs, SD 57747

Dear Mr. Zimiga,

I have received questions about the participation of Veteran Organizations as 'consulting parties' in the integrated National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) process in preparing the Environmental Impact Statement (EIS) for the proposed reconfiguration of health care services in the Black Hills Health Care System service area. hope this letter provides additional clarification about how consulting parties are involved in the process and information about how to request participation.

On October 20, 2014, your office received a letter from VA BHHCS regarding the NHPA Section 106 process that identified the consulting parties who would be invited to actively participate in the Section 106 consultation meetings. The list of consulting parties was based on NHPA regulation 36 CFR 800.2(c) (5) that states consulting parties include "...Certain individuals and organizations with a demonstrated interest in the undertaking... [Who] may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effect on historic properties." Other stakeholders, including the public at large, are encouraged to participate in the NHPA/NEPA process by providing comments during EIS public involvement opportunities, including scoping and the Draft EIS review and comment period.

The list of consulting parties can be modified as the NHPA consultation process continues if demonstrated interest in effects on historic properties is established by an individual or organization. If you would like your organization to be considered as a consulting party for the remainder of the process, please submit a written request either by email to vablackhillsfuture@va.gov or by regular mail to Staff Assistant to the Director, 113 Comanche Rd., Fort Meade, SD 57741. The request letter should include your organization's interest and connection to VA's decision regarding its historic properties. With this request in hand I can review your status as a consulting party.

At this time, we plan to have further discussions with the consulting parties to continue the consultation process early in 2015. Information regarding dates and times will be forthcoming. Thank you for your continued service to our nation's Veterans.

Sincerely,

Stephen R. DiStasio, FACHE
Director

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

January 14, 2015

The American Legion of South Dakota
State Headquarters
PO Box 67
Watertown, SD 57201

Commander Jergens,

Thank you for your December 4, 2014, letter regarding questions about the VA Black Hills Health Care System (VA BHHCS) reconfiguration proposal and the corresponding National Environmental Policy Act (NEPA) process, which VA is integrating with the National Historic Preservation Act (NHPA) process. I forwarded your letter and the attached resolution to the contractor assisting VA with preparing the Environmental Impact Statement (EIS).

On October 20, 2014, your office received a letter from VA BHHCS regarding the NHPA Section 106 process that identified the consulting parties who would be invited to actively participate in the Section 106 consultation meetings. The list of consulting parties was based on NHPA regulation 36 CFR 800.2(c)(5) that states consulting parties include "...Certain individuals and organizations with a demonstrated interest in the undertaking... [who] may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effect on historic properties." Other stakeholders, including the public at large, are encouraged to participate in the NHPA/NEPA process by providing comments during EIS public involvement opportunities, including scoping and the Draft EIS review and comment period.

The list of consulting parties can be modified as the NHPA consultation process continues if demonstrated interest in effects on historic properties is established by an individual or organization. If you would like the South Dakota American Legion to be considered as a consulting party for the remainder of the process, please submit a written request either by email to vablackhillsfuture@va.gov or by regular mail to Staff Assistant to the Director, 113 Comanche Rd., Fort Meade, SD 57741. The request letter should include the American Legion's interest and connection to VA's decision regarding its historic properties. With this request in hand I can confirm your status as a consulting party.

At this time, we plan to have further discussions with the consulting parties to continue the consultation process early in 2015. Information regarding dates and times will be forthcoming. Thank you for your continued service to our Nation's Veterans.

Sincerely,

Stephen R. DiStasio, FACHE
Director

VA HEALTH CARE | ***Defining*** **EXCELLENCE** ***in the 21st Century***

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

January 15, 2015

Paralyzed Veterans of America
Attn: Michael Olson
209 North Garfield
Sioux Falls, SD 57104

Dear Mr. Olson,

I have received questions about the participation of Veteran Organizations as 'consulting parties' in the integrated National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) process in preparing the Environmental Impact Statement (EIS) for the proposed reconfiguration of health care services in the Black Hills Health Care System service area. hope this letter provides additional clarification about how consulting parties are involved in the process and information about how to request participation.

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At this time, we plan to have further discussions with the consulting parties to continue the consultation process early in 2015. Information regarding dates and times will be forthcoming. Thank you for your continued service to our nation's Veterans.

Sincerely,

Stephen R. DiStasio, FACHE
Director

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

January 15, 2015

DAV Department of South Dakota
Eric Van Emmerik
1519 W. 51st Street
Sioux Falls, SD 57105

Dear Mr. Emmerik,

I have received questions about the participation of Veteran Organizations as 'consulting parties' in the integrated National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) process in preparing the Environmental Impact Statement (EIS) for the proposed reconfiguration of health care services in the Black Hills Health Care System service area. hope this letter provides additional clarification about how consulting parties are involved in the process and information about how to request participation.

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At this time, we plan to have further discussions with the consulting parties to continue the consultation process early in 2015. Information regarding dates and times will be forthcoming. Thank you for your continued service to our nation's Veterans.

Sincerely,

Stephen R. DiStasio, FACHE
Director

VA HEALTH CARE | *Defining* **EXCELLENCE** *in the 21st Century*

Department of Veterans Affairs
ASSISTANT SECRETARY FOR PUBLIC AND INTERGOVERNMENTAL AFFAIRS
WASHINGTON DC 20420

Dear Tribal Leader:

The Department of Veterans Affairs (VA) is sending this communication to provide information regarding upcoming consultations on the Proposed Reconfiguration of the VA Black Hills Health Care System (BHHCS).

Proposal and Recent Efforts

The proposal would involve reconfiguring existing services and expanding points of access to health care within the VA Black Hills Health Care System (BHHCS) service area to better serve the health care needs and distribution of Veterans in the VA BHHCS service area over the next 20 to 30 years. That area includes portions of South Dakota, Nebraska, and Wyoming. More information is available on the BHHCS website (http://www.blackhills.va.gov/vablackhillsfuture/).

As required by the National Environmental Policy Act (NEPA), an Environmental Impact Statement (EIS) is being prepared to analyze the environmental consequences of the proposal. A series of NEPA public scoping meetings were held throughout the service area in June. The purpose of public scoping is to ensure the EIS evaluates the range of potential issues associated with the proposal. The public scoping period ended August 16.

Evaluating the potential effect(s) or impact(s) of this proposal is a comprehensive effort that involves outreach efforts, consultations, and compliance with several applicable laws and regulations. To assist in understanding these processes, VA would like to take this opportunity to clarify the term "consultation", which appears in several of these laws and regulations. With respect to the proposal to reconfigure the Black Hills Health Care System, there are two distinct, yet interrelated, sets of consultations.

National Historic Preservation Act Consultation

The regulations implementing Section 106 of the National Historic Preservation Act (NHPA) discuss "consultation" as the process "to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties." This consultation process focuses exclusively on effects to historic properties. NHPA recognizes the government-to-government relationship between the Federal government and the tribes.

Since a key component of this BHHCS proposal involves the VA Hot Springs campus, which is designated as a National Historic Landmark, VA is following the "substitution" process described in the handbook issued jointly by the Council on Environmental Quality and the Advisory Council on Historic Preservation for integrating NEPA and NHPA Section 106 (dated March 2013). This substitution does not lessen any of the NHPA requirements, rather, it provides a more integrated and streamlined mechanism to accomplish the same.

Tribal Consultation

Consultation, as prescribed by Executive Order 13175 and by VA Directive 8603, covers a much broader range of potential tribal concerns and/or issues with respect to the proposed Federal action than just historic preservation. These consultation topics and scope extend well beyond the historical aspects of a particular facility or location. Formal tribal consultation in this sense is a documented process in which input is sought from tribal officials on proposed VA actions which may: (1) require tribal and VA senior leadership involvement; (2) involve the potential for widespread, direct and substantial impact upon more than one tribe or on the relationship between VA and tribes; (3) affect tribal resources, rights, or land; (4) entail policy, legislative, or legal actions involving tribes; or (5) change the distribution of authority and responsibilities between VA and Indian tribes.

Participation in the Section 106 Process for Historic Properties

If you indicate an interest in the NHPA Section 106 consultation process, you will be provided additional details about the relevant schedule and milestones in future correspondence. Please recognize the focus of the Section 106 consultations is limited to evaluation of the potential adverse effects to the Hot Springs campus and other historic properties that may be identified. **Please notify the VA of your interest in the Section 106 process by referencing this letter and identifying your selected point of contact for Section 106 coordination, by either an email to vablackhillsfuture@va.gov, or a letter to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Road, Fort Meade, SD 57741**. We welcome your interest and would appreciate receiving your response within 15 days of your receipt of this letter.

Participation in Tribal Consultation Pursuant to Executive Order 13175

VA is preparing to initiate formal Tribal Consultation this summer as well, possibly as soon as late August or early September. To prepare for these efforts, VA is requesting input from tribes located in South Dakota, North Dakota, Montana, Wyoming, Minnesota, Oklahoma, and Nebraska. The input would be focused on primary topics of concern to the affected tribes and would help craft the agenda, identify venues, and ensure that key VA leadership and personnel attend.

We very much look forward to your input. Based upon the communications to date, VA anticipates Tribal Consultation subjects of interest to include, but not be limited to, the following:

- Tribal government concerns specific to the Hot Springs campus itself;
- Potential for Tribal government interest in the use or actual acquisition of part or all (with some exceptions) of the Hot Springs campus, if the decision to vacate some or all is reached;
- Specific concerns surrounding access, timeliness, and quality of medical care to American Indian Veterans through facilities on or near reservations;
- Other mechanisms for provision of medical care to American Indian Veterans;
- Any effect on other Veterans benefits and services available to American Indian Veterans (for example, through VA's Veterans Benefits Administration or VA's National Cemetery Administration) as a result of the proposal.

In order to properly prepare for the upcoming Tribal Consultation under Executive Order 13175, please provide your comments and requests by September 12, 2014. Comments and requests may be sent electronically to tribalgovernmentconsultation@va.gov, by fax (202) 273-5716 or mail: Department of Veterans Affairs, Office of Tribal Government Relations, 810 Vermont Ave. NW Suite 915e, Washington, DC 20420.

VA recognizes the value of dialogue and importance of communication with American Indian tribes and looks forward to receiving your input. If you have any questions regarding this communication you may contact Peter Vicaire, Office of Tribal Government Relations Specialist, Central Region at (651) 405-5676 or Peter.Vicaire@va.gov.

Sincerely,

Josh Taylor
Acting Assistant Secretary
Office of Public and Intergovernmental Affairs

TRIBAL_NAME	FIRST_NAME	LAST_NAME	TITLE	STREET_ADDRESS	CITY	STATE	ZIP_CODE	WORK_PHONE	FAX_NUMBER	EMAIL
Apache Tribe of Oklahoma	Donnie	Cabaniss Jr.	Chairman	P.O. Box 1330	Anadarko	OK	73005	(405) 247-9493	(405) 247-2686	chairman@apachetribe.com
Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation	Floyd	Azure	Chairman	P.O. Box 1027	Poplar	MT	59255	(406)-768-2382	(406) 768-3054	cultres@nemontel.net
Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation	Darrell	"Curly" Youpee	THPO	P.O. Box 1027	Poplar	MT	59255	(406)-768-2382	(406) 768-3054	cultres@nemontel.net
Blackfeet Nation	Willie A.	Sharp	Chairman	850 Government Square	Browining	MT	59417	(406) 338-7521	(406) 338-7530	blkftthpo@aol.com
Blackfeet Nation	John	Murray	THPO	850 Government Square	Browining	MT	59417	(406) 338-7521	(406) 338-7530	blkftthpo@aol.com
Bois Forte Reservation	Kevin	Leecy	Chairman	5344 Lakeshore Dr.	Nett lake	MN	55772	(218)757-3261	(218)-753-4055	kevin.leecy@boisforte-nsn.gov
Cheyenne and Arapaho Tribes, Oklahoma	Eddie	Hamilton	Governor	P.O. Box 38	Concho	OK	73022	(405) 422-7540	(405) 422-8267	
Cheyenne and Arapaho Tribes, Oklahoma	Max	Bear	THPO, Director	P.O. Box 145	Concho	OK	73022	(405) 422-7714	(405) 422-1199	mbear@c-a-tribes.org
Cheyenne River Sioux Tribe of the Cheyenne River Reservation	Kevin	Keckler, Sr.	Tribal Chairman	P.O. Box 590	Eagle Butte	SD	57625	(605) 964-4155	(605) 964-4151	kevin.keckler@yahoo.com
Cheyenne River Sioux Tribe of the Cheyenne River Reservation	Donna Rae	Peterson		P.O. Box 590	Eagle Butte	SD	57625	(605) 964-7554	(605) 964-7552	
Chippewa-Cree Indians of the Rocky Boy's Reservation	Richard	Morsette	Chairman	RR1, P.O. Box 544	Box Elder	MT	59521	(406) 395-4282	(406) 395-5702	
Chippewa-Cree Indians of the Rocky Boy's Reservation	Alvin	Windy Boy	THPO	RR1, P.O. Box 544	Box Elder	MT	59521	(406) 352-8000	(406) 395-4195	awindyboy@cccrpd.com
Comanche Nation	Wallace	Coffey	Chairman	P.O. Box 908	Lawton	OK	73502	(580) 492-4988	(580) 492-3796	
Comanche Nation	Jimmy	Arterberry	THPO	P.O. Box 908	Lawton	OK	73502	(580) 595-9960 ext.9618	(580) 595-9733	jimmya@comanchenation.com
Confederated Salish and Kootenai Tribes of the Flathead Reservation	Ron	Trahan	Chairman	P.O. Box 278	Pablo	MT	59855	(406) 675-2700, ext. 1076	(406) 675-2629	
Confederated Salish and Kootenai Tribes of the Flathead Reservation	Ira	Matt	THPO	P.O. Box 278	Pablo	MT	59855	(406) 675-2700, ext. 1075	(406) 675-2629	preservation@cskt.org
Crow Creek Sioux Tribe of the Crow Creek Reservation	Roxanne	Sazue	Chairwoman	P.O. Box 50	Fort Thompson	SD	57339	(605) 245-2221	(605) 245-2470	
Crow Creek Sioux Tribe of the Crow Creek Reservation	Wanda	Wells	THPO	P.O. Box 50	Fort Thompson	SD	57339	(605) 245-2250	(605) 245-2470	wandawells@midstatesd.net
Crow Tribe of Montana	Darrin	Old Coyote	Chairman	P.O. Box 159	Crow Agency	MT	59022	(406) 638-3708	(406) 638-3773	
Crow Tribe of Montana	Emerson	Bull Chief	THPO	P.O. Box 159	Crow Agency	MT	59022	(406) 638-4238	(406) 638-3169	ebullchief@crownations.net
Eastern Shoshone	Darwin	St. Clair, Jr.	Chairman	P.O. Box 538	Fort Washakie	WY	82514	(307) 332-3532	(307) 332-3055	sbc_receptionist@yahoo.com
Eastern Shoshone	Wilfred	Ferris	THPO	P.O. Box 538	Fort Washakie	WY	82514	(307) 332-2081	(307) 332-3055	wjferrisiii@yahoo.com
Flandreau Santee Sioux Tribe of South Dakota	Anthony	Reider	President	P.O. Box 283	Flandreau	SD	57028	(605) 997-3891	(605) 997-3878	tony.reider@fsst.org
Flandreau Santee Sioux Tribe of South Dakota	James	Weston	THPO	P.O. Box 283	Flandreau	SD	57028	(605) 997-3512	(605) 997-3878	JB.Weston@fsst.org
Fond du Lac Band of Lake Superior Chippewa	Karen	Driver	Chairwoman	1720 Big Lake Rd.	Cloquet	MN	55720	(218) 879-4593		
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	Mark L.	Azure	President	656 Agency Main Street	Harlem	MT	59526	(406) 353-8450	(406) 353-4541	
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	Morris	Belgard	THPO	656 Agency Main Street	Harlem	MT	59526	(406) 353-8433	(406) 353-2797	mbelgarde@yahoo.com
Grand Portage Reservation	Norman	Deschampe	Chairman	P.O. Box 428	Grand Portage	MN	55605	(218) 475-2277	(218) 475-2284	
Kiowa Indian Tribe of Oklahoma	Amber	Toppah	Chairperson	P.O. Box 369	Carnegie	OK	73015	(405) 654-1729	(508) 654-8714	kbo@kiowatribe.org
Kiowa Indian Tribe of Oklahoma	Amie	Tah-bone	NAGPRA Representative	P.O. Box 369	Carnegie	OK	73015	(405) 654-2300		amie.r.tah-bone-1@ou.edu
Leech Lake Band of Ojibwe	Carri	Jones	Chairwoman	190 Sailstar Dr. NW	Cass Lake	MN	56633	(218) 335-8200	(218) 335-8309	
Lower Brule Sioux Tribe	Michael	Jandreau	Chairman	187 Oyate Circle	Lower Brule	SD	57548	(605) 473-5561	(605) 473-5606	clairsgreen@yahoo.com
Lower Sioux Indian Community in the State of Minnesota	Denny	Prescott	President	P.O. Box 308	Morton	MN	56270	(507) 697-6185	(507) 697-8618	denny.prescott@lowersioux.com
Lower Sioux Indian Community in the State of Minnesota	Grace	Goldtooth-Campos	THPO	P.O. Box 3078	Morton	MN	56270	(507) 697-6321	(507) 637-4380	lowersiouxthpo@gmail.com
Mille Lacs Band of Ojibwe	Melanie	Benjamin	Chairwoman	43408 Oodena Dr.	Onamia	MN	56359	(320) 532-4181	(320) 532-7505	

TRIBAL_NAME	FIRST_NAME	LAST_NAME	TITLE	STREET_ADDRESS	CITY	STATE	ZIP_CODE	WORK_PHONE	FAX_NUMBER	EMAIL
Northern Arapaho Tribe	Darrell	O'Neal, Sr.	Chairman	P.O. Box 396	Fort Washakie	WY	82514	(307) 332-6120	(307) 332-7543	northernarapaho@msn.com
Northern Arapaho Tribe	Corrine	Headly	THPO	P.O. Box 396	Fort Washakie	WY	82514	(307) 856-1628	(307) 856-4611	northernarapahothpo@msn.com
Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation	Llevando	Fisher	President	P.O. Box 128	Lame Deer	MT	59043	(406) 477-6284	(406) 477-6210	llevando.fisher@cheyennenation.com
Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation	Conrad	Fisher	THPO	P.O. Box 128	Lame Deer	MT	59043	(406) 477-6284 ext. 165	(406) 477-6210	conrad.fisher@cheyennenation.com
Oglala Sioux Tribe of the Pine Ridge Reservation	Bryan	Brewer	President	P.O. Box 2070	Pine Ridge	SD	57770	(605) 867-8420	(605) 867-6076	bb@oglala.org
Oglala Sioux Tribe of the Pine Ridge Reservation	Mike	Catches Enemy	THPO	P.O. Box 419	Pine Ridge	SD	57770	(605) 455-1225		oglalathpo@goldenwest.net
Omaha Tribe of Nebraska	Clifford	Wolfe, Jr.	Chairman	P.O. Box 368	Macy	NE	68039	(402) 837-5391	(402) 837-5308	
Omaha Tribe of Nebraska	Calvin R.	Harlan	THPO	P.O. Box 368	Macy	NE	68039	(402) 837-5391	(402) 837-5308	CJHarlan59@yahoo.com
Ponca Tribe of Indians of Oklahoma	Douglas G.	Rhodd, Sr.	Chairman	20 White Eagle Drive	Ponca City	OK	74601	(580) 762-8104	(580) 762-2743	chairmanrhodd@ponca.com
Ponca Tribe of Nebraska	Rebecca	White	Chairwoman	P.O. Box 288	Niobrara	NE	68760	(402) 857-3391	(402) 857-3736	janc@poncatribe-ne.org
Ponca Tribe of Nebraska	Randy	Teboe	THPO	P.O. Box 288	Niobrara	NE	68760	(402) 857-3519	(402) 857-3652	rteboe@poncatribe-ne.org
Prairie Island Indian Community in the State of Minnesota	Ronald	Johnson	President	5636 Sturgeon Lake Road	Welch	MN	55089	(651) 385-2554	(651) 385-4180	
Red Lake Nation	Seki	Darrell	Chairman	24200 Council St.	Red Lake	MN	56671	(218) 679-3341		
Rosebud Sioux Tribe of the Rosebud Indian Reservation	Cyril	Scott	President	P.O. Box 430	Rosebud	SD	57570	(605) 747-2381	(605) 747-2905	rst_chairman@gwtc.net
Rosebud Sioux Tribe of the Rosebud Indian Reservation	Russell	Eagle Bear	THPO	P.O. Box 809	Rosebud	SD	57570	(605) 747-4255	(605) 441-9884	rstthpo@yahoo.com
Santee Sioux Nation	Roger	Trudell	Chairman	108 Spirit Lake Avenue West	Niobrara	NE	68760	(402) 857-2772	(402) 857-2779	rtrudell@santeedakota.org
Santee Sioux Nation	Richard	Thomas	THPO	108 Spirit Lake Avenue West	Niobrara	NE	68760	(402) 857-3346	(402) 857-2862	rick_thpo02@yahoo.co
Shakopee Mdewakanton Sioux Community	Charlie	Vig	Chairman	2330 Sioux Trail NW	Prior Lake	MN	55372	(952) 496-6109		
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation	Robert	Shepherd	Chairman	P.O. Box 509	Agency Village	SD	57262	(605) 698-3911	(605) 698-3708	roberts@swo-nsn.gov
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation	Dianne	Desrosiers	THPO	Old Agency Box 717	Agency Village	SD	57262-0509	(605) 698-3584	(605) 698-4283	DianneD@swo-nsn.gov
Spirit Lake Sioux Tribe	Leander 'Russ"	McDonald	Chairperson	P.O. Box 359	Fort Totten	ND	58335	(701) 766-4221	(701) 766-4126	admin@spiritlakenation.com
Standing Rock Sioux Tribe of North and South Dakota	Dave	Archambault II	Chairman	P.O. Box D	Fort Yates	ND	58538	(701) 854-7201	(701) 854-8595	acordova@standingrock.org
Standing Rock Sioux Tribe of North and South Dakota	Waste'Win	Young	THPO	P.O. Box D	Fort Yates	ND	58538	(701) 854-8645	(701) 854-8595	wyoung@standingrock.org
Three Affiliated Tribes of the Fort Berthold Reservation (Mandan, Hidatsa, Arikara)	Tex	Hall	Chairman	404 Frontage Road	New Town	ND	58763	(701) 862-2474	(701) 862-2490	texhall@mhanation.com
Three Affiliated Tribes of the Fort Berthold Reservation (Mandan, Hidatsa, Arikara)	Elgin	Crows Breast	THPO	404 Frontage Road	New Town	ND	58763	(701) 862-2474	(701) 862-3401	redhawk@mhanation.com
Turtle Mountain Band of Chippewa Indians of North Dakota	Richard	McCloud	Chairman	P.O. Box 900	Belcourt	ND	58316	(701) 477-2600	(701) 477-6836	merle.stclaire@yahoo.com
Turtle Mountain Band of Chippewa Indians of North Dakota	Kade	Ferris	THPO	P.O. Box 900	Belcourt	ND	58316	(701) 477-2604	(701) 477-3593	kade@tribalresources.com
Upper Sioux Community	Kevin	Jensvold	Chairman	P.O. Box 147	Granite Falls	MN	56241-0147	(320) 564-2360	(320) 564-4482	kevinj@uppersiouxcommunity-nsn.gov
Upper Sioux Community	Marlow	LaBatte	THPO	P.O. Box 147	Granite Falls	MN	56241-0147	(320) 564-3853	(320) 564-4482	marlowl@uppersiouxcommunity-nsn.gov
White Earth Nation	Erma	Vizenor	Chairwoman	P.O. Box 418	White Earth	MN	56591	(218) 983-3285		
Winnebago Tribe of Nebraska	John	Blackhawk	Chairman	100 Bluff St. P.O. Box 687	Winnebago	NE	68071	(402) 878-2272	(402) 878-2963	
Yankton Sioux Tribe of South Dakota	Robert	Flying Hawk	Chairman	P.O. Box 1153	Wagner	SD	57380	(605) 384-3641	(605) 384-5687	
Yankton Sioux Tribe of South Dakota	Lyle	Miller	THPO	P.O. Box 1153	Wagner	SD	57380	(605) 384-3641	(605) 384-5687	yst.thpo@gmail.com

Section 106 Consultation for the Integrated National Environmental Policy Act and National Historic Preservation Act Process

Proposed Reconfiguration of the VA Black Hills Health Care System

Summary of Consulting Parties Workshop Hot Springs and Pine Ridge, South Dakota November 18-19, 2014

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

January 20, 2015

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A Consulting Parties Workshop Invitation Letter
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C Consulting Parties Workshop Handout and Displays

LIST OF ACRONYMS

ADA – Americans with Disabilities Act
ABA – Architectural Barriers Act
APE - Area of potential effects
BHHCS - Black Hills Health Care System
CBOC - Community Based Outpatient Clinic
CFR – Code of Federal Regulations
EIS – Environmental Impact Statement
MSOC - Multi Specialty Outpatient Clinic
NEPA - National Environmental Policy Act
NHPA – National Historic Preservation Act
NHL – National Historic Landmark
NPS – National Park Service
NRHP – National Register of Historic Places
RRTP - Residential Rehabilitation Treatment Program
SHPO - State Historic Preservation Office
THPO – Tribal Historic Preservation Office
VA - Veterans Affairs

1.0 INTRODUCTION

The Department of Veterans Affairs (VA) Black Hills Health Care System (VA BHHCS) has proposed to reconfigure health care services within the VA BHHCS service area, which VA has determined to be a federal undertaking under Section 106 of the National Historic Preservation Act (NHPA) and a federal action subject to the National Environmental Policy Act (NEPA). VA has chosen to integrate Section 106 consultation within the overall NEPA framework, following the substitution process of 36 Code of Federal Regulations (CFR) 800.8(c). VA is preparing an environmental impact statement (EIS) that will meet the standards for compliance with Section 106.

Three proposed alternatives for the undertaking include vacating the Hot Springs VA Medical Center campus and three alternatives propose renovations to existing buildings on the campus. The proposed undertaking (federal action) would affect the campus, which is a National Historic Landmark (NHL) and a contributing element to the Hot Springs Historic District as listed on the National Register of Historic Places (NRHP).

1.1 Consulting Parties

Consulting parties for Section 106 of the NHPA fall into five categories per 36 CFR 800.2(c): (1) the state historic preservation officer; (2) Indian tribes; (3) representatives of local governments; (4) applicants for Federal assistance, permits, licenses and other approvals; and (5) additional consulting parties. This last category is defined as "Certain individuals and organizations with a demonstrated interest in the undertaking [who] may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties."

VA hosted a Section 106 workshop for the consulting parties on November 18 and 19, 2014, at Hot Springs and Pine Ridge, South Dakota. The consulting parties with a demonstrated interest in the undertaking and its effects on historic properties who had been identified by October 20, 2014, and who were invited to participate in the workshop are listed in Table 1. The letter inviting the consulting parties to the workshop is included in Appendix A. Other consulting parties may be added as the Section 106 consultation process continues.

1.2 Purpose of this Summary

The purposes for this summary are to document the discussions and input received during the workshop, and to present the next steps for further consultation.

Table 1. Workshop Invitations and Attendance

Organization*	Attended Workshop
Advisory Council for Historic Preservation	Yes
City of Hot Springs	Yes
Department of the Interior: National Park Service	Yes
Fall River County Commission Office	Yes
Fall River County Historical Society	No
Fort Peck Tribes of Assiniboine and Sioux	No
Hot Springs Certified Local Government–Historic Preservation Commission	Yes
Kiowa Tribe of Oklahoma	No
National Trust for Historic Preservation	Yes
Northern Arapaho Tribe	No
Oglala Sioux Tribe of the Pine Ridge Reservation	Yes
Save the VA	Yes
South Dakota State Historic Preservation Office	Yes
Yankton Sioux Tribe	No
* Includes all consulting parties identified as of October 20, 2014	

2.0 WORKSHOP DISCUSSION

The Section 106 workshop participants included consulting party representatives (see Appendix B), VA staff, and the EIS contractor (Labat Environmental and SWCA Environmental Consultants). The meetings were open to public observation and members of the public attended. The agenda for the workshop is included in Appendix C. Discussion during the workshop focused primarily on seeking input from consulting parties regarding the area of potential effects, identifying historic properties, and identifying potential effects to the historic properties for each of the proposed alternatives for the undertaking.

The following sections summarize the discussion of each agenda topic. Responses and explanations, as appropriate for clarification, are included for some of the questions and issues raised during the discussions.

2.1 Undertaking and Alternatives

A brief summary of the undertaking (and federal action) and proposed alternatives was provided. The summary focused on highlighting the similar components among the alternatives, which include vacating all or some of the buildings on the Hot Springs VA Medical Center campus, renovations to some buildings, and construction of new buildings on the campus or at yet to be identified locations in Hot Springs and Rapid City.

VA outlined the process regarding building/campus reuse options, should an alternative be chosen that results in vacating the Hot Springs campus facility. The Director for the VA Black Hills Health Care System described the reuse study VA is exploring. Although the study is currently in the initial stages of information gathering, VA will engage with other federal agencies to identify if their agencies may have a need for a facility in Hot Springs. VA would then request reuse

interest/proposals from other entities including the city, non-profits, or possibly for-profit organizations that might operate under a lease agreement with VA. A reuse option referred to as the "medical miracle" was submitted to VA as a comment during the EIS scoping process. The consideration of reuse options in the EIS will focus on the analysis of the broader effects of reuse, and not the details of any particular reuse.

2.2 Scoping Comments

Comments received from the consulting parties during the EIS public scoping period were summarized. The consulting parties confirmed their interests in the undertaking and related historic property concerns, including:

- economy, historic district, and community of Hot Springs;
- historic property of the Battle Mountain Sanitarium NHL;
- continued use of the sanitarium buildings, reuse of the buildings that is compatible with the original design, and Americans with Disabilities Act (ADA) and Architectural Barriers Act (ABA) accessibility options and rehabilitation alternatives; and
- Section 106/NEPA integration (substitution) process and general Section 106 compliance.

2.3 Area of Potential Effects

The initial area of potential effects (APE) identified by VA during the EIS scoping process was the VA property boundary for the Hot Springs VA Medical Center campus, including the National Cemetery. VA consulted the South Dakota State Historic Preservation Office (SHPO) about the APE, and SHPO requested via letter dated November 7, 2014, the APE be expanded to include the Hot Springs Historic District. Other consulting parties made similar requests during the workshop. Because the boundaries of the Historic District are not well defined, the SHPO and Hot Springs Historic Preservation Commission will provide additional information to more accurately determine the boundary.

Consulting parties asked how VA will determine and address the size and scale of the APE for alternatives that would result in new construction in Hot Springs or Rapid City at locations yet to be identified. Alternatives that would require ground disturbance or that could otherwise affect historic properties in as-yet unidentified locations would be assessed in a broader sense for the purposes of the EIS. VA recognizes its NEPA and Section 106 responsibilities in identifying historic properties, and potential effects to them, on any new parcels that might be acquired. VA will adhere to Section 106 and its Cultural Resource Management Procedures during future scoping for acquisition of property for new construction or renovation. VA's cultural resources procedures can be found at (www.va.gov/vapubs/viewPublication.asp?Pub_ID=584&FType2). Section 106 regulation 36 CFR 800.4(b)(2) allows for deferral of identification and evaluation of historic properties, through provisions in the EIS Record of Decision or another agreement document, until specific locations of the selected alternative are refined and through appropriate consultation procedures.

Suggestions were made to include the pumphouse for the VA Hot Springs campus, State Veterans Home and cemetery, Fort Meade Historic District, the Battle Mountain landform, and the town of Hot Springs. The pumphouse location is not included within the NHL or Historic District

boundaries, but it supports the operations of the Hot Springs VA medical center and will be considered for inclusion in the APE. Based on parcel information provided by the City, the State Veterans Home and cemetery are not part of the Hot Springs Historic District; its connection to potential effects of the undertaking on historic properties is being reviewed by VA. The extension of the undertaking and inclusion of Fort Meade Historic District in the APE are also being reviewed by VA. The potential for effects of the undertaking to the Battle Mountain landform and its inclusion in the APE are being considered by VA. Although the town of Hot Springs will be included in the study area for the EIS for all potentially affected resources, it will be considered by VA for inclusion in the APE. These locations (except Fort Meade) are shown on Figure 1.

2.4 Identification of Historic Properties

Identification efforts to date found that the principal historic properties that would be affected by the undertaking are the Battle Mountain Sanitarium NHL, which makes up most of the Hot Springs VA Medical Center campus, and the Hot Springs Historic District. The Battle Mountain Sanitarium has been a contributing resource to the Hot Springs Historic District since the listing in the NRHP in 1974. Additionally the proposed undertaking is in an area (Black Hills region) that is historically and culturally important to Native American tribes.

Consulting parties stated that other historic or prehistoric resources may be present within the property boundaries of the Hot Springs VA Medical Center campus, such as the VA facility's historic-era trash dump, its original pumphouse along the river, and evidence of prehistoric occupancy. No archaeological resources have been identified according to VA and SHPO records. Only Alternative E currently contemplates ground disturbance or possible alteration of management of the medical center campus grounds that could affect unknown archaeological resources. The EIS analysis will consider effects to these types of resources and a phased approach to identification and assessment of effects per 36 CFR 800.

The Battle Mountain landform was suggested as a historic property related to the history of American Indian activity in the area and the importance of the hot springs there. The Battle Mountain landform and associated potential historic property concerns are being reviewed by VA.

Another suggestion was to consider the entire town of Hot Springs as a historic property, not just the Historic District. Although the Hot Springs Historic District encompasses much of the town, including the downtown business district, the VA Medical Center campus and cemetery, and adjacent residential areas, it is unlikely that all buildings and features in this living town are historic.

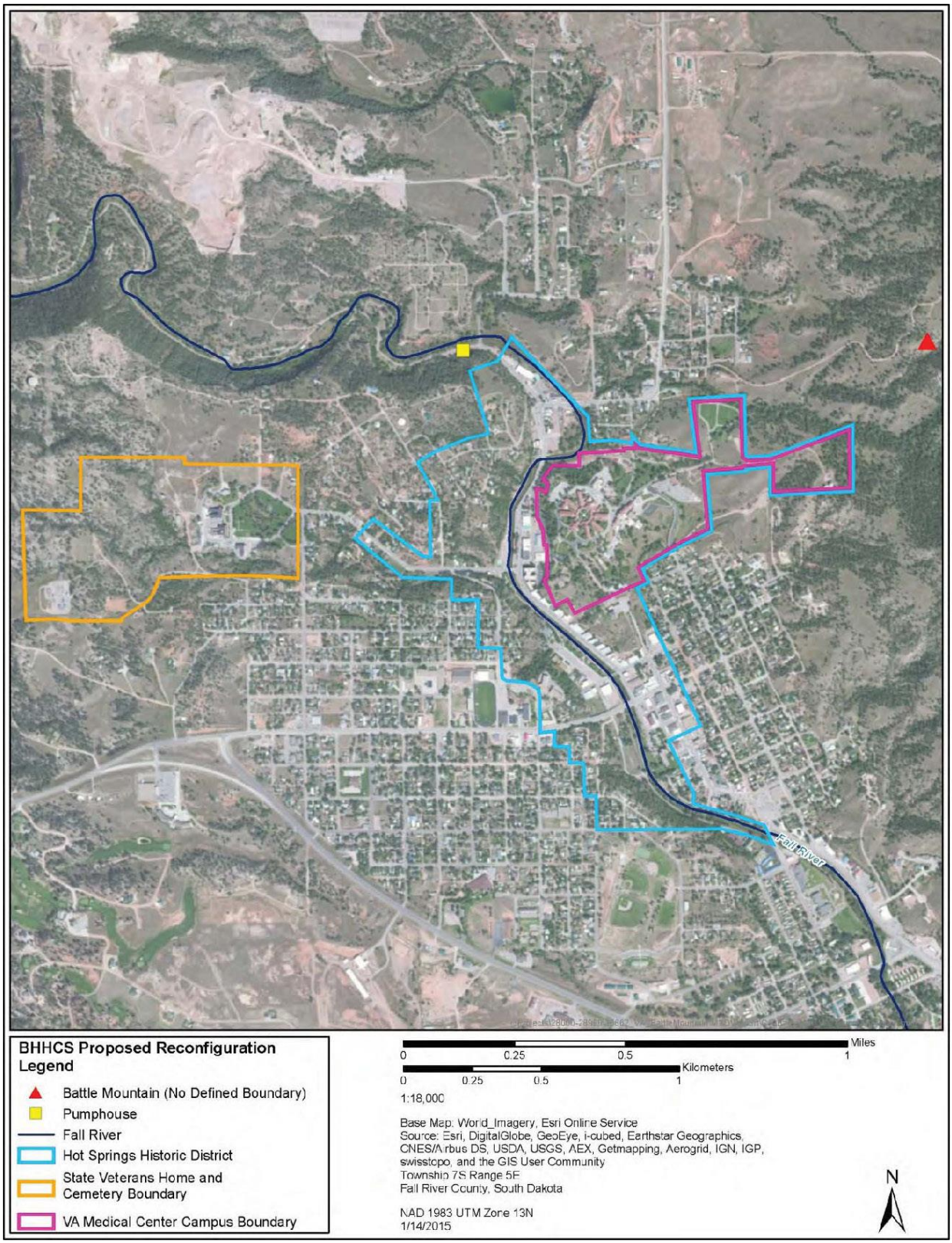


Figure 1. Locations Considered for Inclusion in Area of Potential Effects.

Appendix C: NEPA / NHPA Substitution Process C-27

2.5 Potential Effects

Potential effects of the undertaking on historic properties for each of the proposed alternatives were discussed and are listed in Table 2. Due to the similar components of some of the alternatives, including those considering vacating and/or renovating portions of the Hot Springs Medical Center campus, many of the potential effects would apply to more than one alternative. The potential effects listed in the table have not yet been screened or evaluated to determine if the effects are to historic properties or to other environmental, economic, and social resources, or to both. Input during the workshop included indirect, direct, and cumulative effects. The list of potential effects will be further refined and possibly expanded or reduced during further consultation as the impact analysis proceeds and the Draft EIS is prepared.

Effects that would likely be either beneficial or adverse were identified. VA will apply the criteria for determining adverse effect (36 CFR 800.5) and continue discussions with consulting parties during future consultation.

Table 2. Potential Effects Identified by Alternative

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
A	Build or lease new CBOC Vacate VA Hot Springs campus	Build or lease new MSOC and 100-bed RRTP	➢ The new location may impact the historic district including viewshed, traffic, and other concerns. ➢ City infrastructure may be impacted due to a decline in rate of use and customer base. Possibility exists that the infrastructure is also historic. ➢ Potential for archaeological sites at new locations. ➢ Potential for archaeological sites on Hot Springs (Battle Mountain) campus, including a historic-era VA dump area. ➢ Battle Mountain and waters (Fall River and associated hot springs) as possible historic property concern related to Native American history. ➢ Re-Use Options. Future management of the property. VA's Property Disposition Process [to be initiated if alternatives are chosen that vacate the Hot Springs campus]. ➢ Change of use if the campus is no longer used as a medical facility. ➢ Vacant building; damage during mothballing. ➢ Native American access to the VA sweat lodge facility may be limited. ➢ Water rights retained by the VA. ➢ Local government tax-base impacts. ➢ Removing VA from the property and the impacts to Hot Springs as the "Veterans Town." ➢ Potential degradation of the National Historic Landmark and the Hot Springs Historic District. ➢ Museum collections and records currently stored at the campus will need to be rehoused if the campus is vacated. ➢ Consideration of cumulative effects per Section 106. ➢ Potential effect to the State Veterans Home due to changes in VA services in the area. ➢ Potential effect to the National Cemetery management, which currently relies on co-location with VA health services at the Hot Springs (Battle Mountain) campus.

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
B (same potential effects identified as Alternative A)	Build or lease new CBOC and 100-bed RRTP Vacate VA Hot Springs campus	Build or lease new MSOC	➢ The new location may impact the historic district including viewshed, traffic, and other concerns. ➢ City infrastructure may be impacted due to a decline in rate of use and customer base. Possibility exists that the infrastructure is also historic. ➢ Potential for archaeological sites at new locations. ➢ Potential for archaeological sites on Hot Springs (Battle Mountain) campus, including a historic-era VA dump area. ➢ Battle Mountain and waters (Fall River and associated hot springs) as possible historic property concern related to Native American history. ➢ Re-Use Options. Future management of the property. VA's Property Disposition Process [to be initiated if alternatives are chosen that vacate the Hot Springs campus]. ➢ Change of use if the campus is no longer used as a medical facility. ➢ Vacant building; damage during mothballing. ➢ Native American access to the VA sweat lodge facility may be limited. ➢ Water rights retained by the VA. ➢ Local government tax-base impacts. ➢ Removing VA from the property and the impacts to Hot Springs as the "Veterans Town." ➢ Potential degradation of the National Historic Landmark and the Hot Springs Historic District. ➢ Museum collections and records currently stored at the campus will need to be rehoused if the campus is vacated. ➢ Consideration of cumulative effects per Section 106. ➢ Potential effect to the State Veterans Home due to changes in VA services in the area. ➢ Potential effect to the National Cemetery management, which currently relies on co-location with VA health services at the Hot Springs (Battle Mountain) campus.
C	Renovate Building 12 for CBOC Renovate Domiciliary for 100-bed RRTP	Build or lease new MSOC	➢ Building exteriors may be potentially altered for rehabilitation or reuse. ➢ Vacate portions of buildings or entire buildings on the campus. ➢ Change in use of some of the buildings. ➢ Potential for maintenance neglect. ➢ Renovation is a positive effect for continued use of the property. ➢ Continued VA ownership ensures compliance with historic preservation laws.

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
D (same potential effects identified as Alternatives A and B)	Build or lease new CBOC and 24-bed RRTP Vacate VA Hot Springs campus	Build or lease new MSOC and 76-bed RRTP	➢ The new location may impact the historic district including viewshed, traffic, and other concerns. ➢ City infrastructure may be impacted due to a decline in rate of use and customer base. Possibility exists that the infrastructure is also historic. ➢ Potential for archaeological sites at new locations. ➢ Potential for archaeological sites on Hot Springs (Battle Mountain) campus, including a historic-era VA dump area. ➢ Battle Mountain and waters (Fall River and associated hot springs) as possible historic property concern related to Native American history. ➢ Re-Use Options. Future management of the property. VA's Property Disposition Process [to be initiated if alternatives are chosen that vacate the Hot Springs campus]. ➢ Change of use if the campus is no longer used as a medical facility. ➢ Vacant building; damage during mothballing. ➢ Native American access to the VA sweat lodge facility may be limited. ➢ Water rights retained by the VA. ➢ Local government tax-base impacts. ➢ Removing VA from the property and the impacts to Hot Springs as the "Veterans Town." ➢ Potential degradation of the National Historic Landmark and the Hot Springs Historic District. ➢ Museum collections and records currently stored at the campus will need to be rehoused if the campus is vacated. ➢ Consideration of cumulative effects per Section 106. ➢ Potential effect to the State Veterans Home due to changes in VA services in the area. ➢ Potential effect to the National Cemetery management, which currently relies on co-location with VA health services at the Hot Springs (Battle Mountain) campus.

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
E (Save the VA)	Renovate domiciliary for 200-bed RRTP Renovate Building 12 for inpatient care Other upgrades/ renovations to buildings/new construction New programs and services at Hot Springs campus	No change	➢ Will restore/renew services to the campus (see "Save the VA" White Paper) ensuring continued use of all the historic buildings. ➢ Facility continues to be maintained. ➢ Disabled access alterations on building exteriors including ramps and sidewalk upgrades. ➢ Upgrades and renovations may have a potential effect on the historic property. ➢ Potential for archaeological sites on Hot Springs (Battle Mountain) campus where new construction would occur. ➢ Location of new construction may impact the historic landmark including viewshed, traffic, and other concerns.
F (No Action)	Continue health care services at VA Hot Springs campus	No change	➢ Facility continues to be maintained. ➢ Retains historic use.

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
G	Future re-use of all or part of VA Hot Springs campus	No change	➢ Re-Use Options. Future management of the property. VA's Property Disposition Process [to be initiated if alternatives are chosen that vacate the Hot Springs campus]. ➢ Change of use if the campus is no longer used as a medical facility. ➢ Removing VA from the property and the impacts to Hot Springs as the "Veterans Town." ➢ Potential degradation of the National Historic Landmark and the Hot Springs Historic District. ➢ Museum collections and records currently displayed and stored at the campus will need to be rehoused if the campus is vacated. ➢ City infrastructure may be impacted due to a change in rate of use and customer base. Possibility exists that the infrastructure is also historic. ➢ Potential for archaeological sites on Battle Mountain Campus, including a historic-era VA dump area. ➢ Battle Mountain and Waters (Fall River, and associated hot springs) as possible historic property concern related to Native American history. ➢ VA would no longer offer a Native American sweat lodge facility at the Battle Mountain Campus location. ➢ Consideration of cumulative effects per Section 106. ➢ Potential effect to the State Veterans Home due to changes in VA services in the area. ➢ Potential effect to the National Cemetery management, which currently relies on co-location with VA health services.

CBOC = Community Based Outpatient Clinic
MSOC = Multi Specialty Outpatient Clinic
RRTP = Residential Rehabilitation Treatment Program

3.0 NEXT STEPS

Next steps, of which some overlap, include:

- Finalize APE – The final APE will include the 1974-listed Hot Springs Historic District and the pumphouse. The State Veterans Home and cemetery, the Battle Mountain landform, and Fort Meade Historic District will be considered by VA for addition to the APE. The procedure for addressing effects on future properties hosting new or renovated facilities under the reconfiguration will be described in the EIS. VA will present a final APE to the consulting parties in January 2015.

- Prepare Description of Affected Environment/APE – VA will describe the affected environment for the EIS upon determination of the final APE.

- Apply the Criteria of Adverse Effect – VA will review potential effects discussed with the consulting parties, and any other potential effects identified during VA's consideration of the undertaking's alternatives, and apply the Criteria of Adverse Effect to those potential effects. VA will consider all potential adverse effects in its selection of the preferred alternative, and will develop measures to resolve those effects through avoidance, minimization, or mitigation, in consultation with the consulting parties.

- Identify Preferred Alternative – VA will identify the preferred alternative to the consulting parties to assist with the consultation process, and it will also be identified in the Draft EIS, which is anticipated to be completed by late spring 2015. All alternatives will receive due diligence and analysis through the EIS process.

- Resolution of Adverse Effects – Acknowledging the importance of consulting parties' input on the resolution of adverse effects, VA anticipates that consultation and discussions in early 2015 will focus on resolving any potential adverse effects of VA's preferred alternative. Because of the similar components among the alternatives, identification of measures to avoid, minimize, or mitigate adverse effects will apply to more than one alternative. Input from the consulting parties on resolutions of adverse effects will be incorporated into the cultural resources section of the Draft EIS for review by the consulting parties.

- Future Consultation – Consulting parties will be given as much notice as possible for scheduling purposes and provided a range of dates for future consultation to review and discuss adverse effects and options to resolve any such effects. Several consulting parties stated that in-person meetings were preferred to conference calls; therefore, VA will continue to emphasize future in-person meetings as the schedule allows.

4.0 OTHER COMMENTS

Comments made that did not pertain to the agenda topics under discussion were noted in the "parking lot". These comments were not dismissed, but were considered not pertinent to the

topic of historic properties, and potential effects to them, during the limited workshop schedule. Those comments and responses are as follows:

- Provide information on how and when consulting parties were identified and when Section 106 was initiated for the project. Response: Consulting parties were identified from numerous stakeholders who VA had notified in May 2012 and again in May 2014 of the reconfiguration proposal. Attendees at the public scoping meetings in June 2014 were invited to submit written requests to be considered as a consulting party, and in October 2014, VA notified the stakeholders of the preliminary list of consulting parties. VA held discussions with stakeholders in 2012 regarding potential effects to historic properties and has since re-initiated consultation with the start of the integrated NEPA/NHPA process as noticed in the Federal Register on May 16, 2014.

- Provide examples of successful NEPA/NHPA integration. Response: Examples can be found in the NEPA and NHPA Handbook for Integrating NEPA and Section 106 prepared by the Council on Environmental Quality and Advisory Council on Historic Preservation (www.achp.gov/docs/NEPA_NHPA_Section_106_Handbook_Mar2013.pdf).

- How will the Section 106 process be concluded through the EIS and what agreements might be executed to complete the process? Response: The results of the Section 106 consultation process, commitments to resolve any adverse effects, and the commitment to conduct future Section 106 consultation for yet to be identified sites will be documented in the Record of Decision for the EIS.

- An architect with historic preservation experience should be hired to fully evaluate the historic buildings and to assess the costs associated with renovations and ADA compliance upgrades. Response: Information and data from a 2012 historic condition assessment, renovation impact review, and renovation cost estimates prepared by Treanor Architects, a historic architecture company, will be included in the Draft EIS. As appropriate, the Draft EIS will also develop or discuss the need for additional information on this topic in accordance with the requirements of 40 CFR 1502.22 for addressing incomplete or unavailable information in an EIS.

- Can other alternatives be considered at this point in the process? Response: There were no additional alternatives to the proposed reconfiguration identified during the public scoping process. Any alternatives that might be proposed by the public in response to the Draft EIS will be considered.

- Provide more detail on the alternatives to adequately compare and analyze the differences. Response: Detailed descriptions of the alternatives will be provided in the Draft EIS; however, VA will be sharing more detail with the consulting parties to facilitate the consultation process in discussing possible adverse effects and measures to avoid, minimize, or mitigate adverse effects.

- Review the purpose and need statement regarding ADA compliance, and relatedly, review the VA operating costs for the Hot Springs facility. Response: The Draft EIS will fully discuss the purpose and need for the reconfiguration proposal and include estimated costs of all alternatives. The purpose and need statement, as published during the

workshop and open houses, has been updated to identify the need for accessible facilities without using phrasing that would limit the acceptable solutions.

- Does Alternative F—no action—keep services as they are? Response: The No Action Alternative involves no change from current approach to maintenance, renovations, or other management actions for existing facilities. The Council on Environmental Quality's "40 Questions" explains what a no action alternative includes (http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf).
- Provide copies of scoping comments for review in both Hot Springs and Ft. Meade. Response: A scoping report that provides a summary of the comments received will be posted online at www.blackhills.va.gov/vablackhillsfuture.
- When did the "downsizing process" at the Hot Springs campus start? Response: As part of its mission, VA has continually adjusted medical services to meet current and projected medical needs of Veterans and their families, including the nature of the services and the locations where they are provided. The trends that were considered by VA in determining the purpose and need for the proposed reconfiguration will be described in the Draft EIS.

APPENDIX A

Consulting Parties Workshop Invitation Letter

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

October 20, 2014

RE: Proposed Black Hills Health Care System Reconfiguration
Consulting Party Confirmation and Workshop

Dear Consulting Party:

The Department of Veterans Affairs (VA) Black Hills Health Care System (VA BHHCS) is recognizing your organization as a consulting party to assist VA BHHCS with the National Historic Preservation Act (NHPA) Section 106 process for the proposal to reconfigure the delivery of health care services across the VA BHHCS service area. VA BHHCS is preparing an environmental impact statement (EIS) on this proposal that integrates the implementation and review procedures of the National Environmental Policy Act with consultation under Section 106 of the NHPA. This letter confirms your participation as the consulting party representative for your organization, and announces a workshop for consulting parties in Hot Springs and Pine Ridge, SD.

Historic Properties and Effects

The VA BHHCS' proposed reconfiguration is referred to as the federal "undertaking" for purposes of Sections 106 and 110(f) of the NHPA. Section 106 focuses on the potential effects of an undertaking on historic properties that are listed or eligible for listing in the National Register of Historic Places, whereas Section 110(f) specifically refers to National Historic Landmarks (NHL).

Three of the proposed alternatives for the undertaking (refer to Attachment 1) include vacating the Hot Springs VA medical center campus and three alternatives propose renovations to existing buildings on the campus. Since the Hot Springs campus encompasses the NHL Battle Mountain Sanitarium, National Home for Disabled Volunteer Soldiers, the proposed undertaking might affect this historic property. The NHL was designated in 2011 and part of the campus also contributes to the 1974 National Register listed Hot Springs Historic District. The Battle Mountain Sanitarium NHL documentation is available at www.blackhills.va.gov/battlemtn.

Role of the Consulting Party

Consultation is defined in the Section 106 regulations as "the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process". Consulting parties can assist in this process by:

- Identifying historic properties;
- Identifying and evaluating potential effects to those historic properties;

- Recommending options to avoid, minimize, or mitigate adverse effects;
- Reviewing information on VA's findings and plans for the undertaking;
- Participating in teleconferences, workshops, and meetings; and
- Assuming a specific role, as appropriate, in any agreements necessary to resolve adverse effects on historic properties.

Section 106 Workshop for Consulting Parties

VA BHHCS, with assistance from our contractor team of Labat Environmental and SWCA Environmental Consultants, will be hosting a Section 106 workshop for consulting parties. The workshop will be held at two different locations with the same material presented at both locations, so you are invited to attend one or both. The workshop schedule is:

Hot Springs	Pine Ridge
Tuesday, November 18, 2014	Wednesday, November 19, 2014
1:00 to 3:00 p.m.	10:00 a.m. to 12:00 p.m. (noon)
Mueller Center	Billy Mills Hall
801 South 6th Street	U.S. Highway 18
Hot Springs, SD 57747	Pine Ridge, SD 57770

The format for the workshop will include presentations by the contractor team, followed by discussions of the topics on the agenda. The tentative agenda includes:

- Presentation of the undertaking and alternatives
- Presentation of scoping comments pertaining to historic properties/Section 106
- Presentation of the Area of Potential Effects
- Discussion and identification of historic properties
- Discussion of potential effects to historic properties
- Discussion of options to avoid, minimize, or mitigate adverse effects
- Next steps

As the consulting party representative, you will be the spokesperson for your organization during the workshop discussions. Therefore, to ensure productive and organized discussions, we anticipate you will have received input from your organization prior to the workshop and will participate and speak on its behalf.

We appreciate your willingness to serve as a consulting party representative and look forward to your participation in the workshop and the Section 106 process. Please direct any questions regarding your role as a consulting party representative or questions on the workshop to vablackhillsfuture@va.gov.

Sincerely,

Stephen R. DiStasio
Director

Attachment

Attachment 1

INFORMATION SHEET

Environmental Impact Statement for VA Black Hills Health Care System Reconfiguration

National Environmental Policy Act (NEPA)

- Federal agency must consider environmental impacts of their proposal in deciding what action to take
- Prepare an Environmental Impact Statement (EIS) to determine if the proposed action or alternatives have potential to significantly impact the natural and human (social, economic) environment
- Identify reasonable measures to avoid or minimize environmental harm

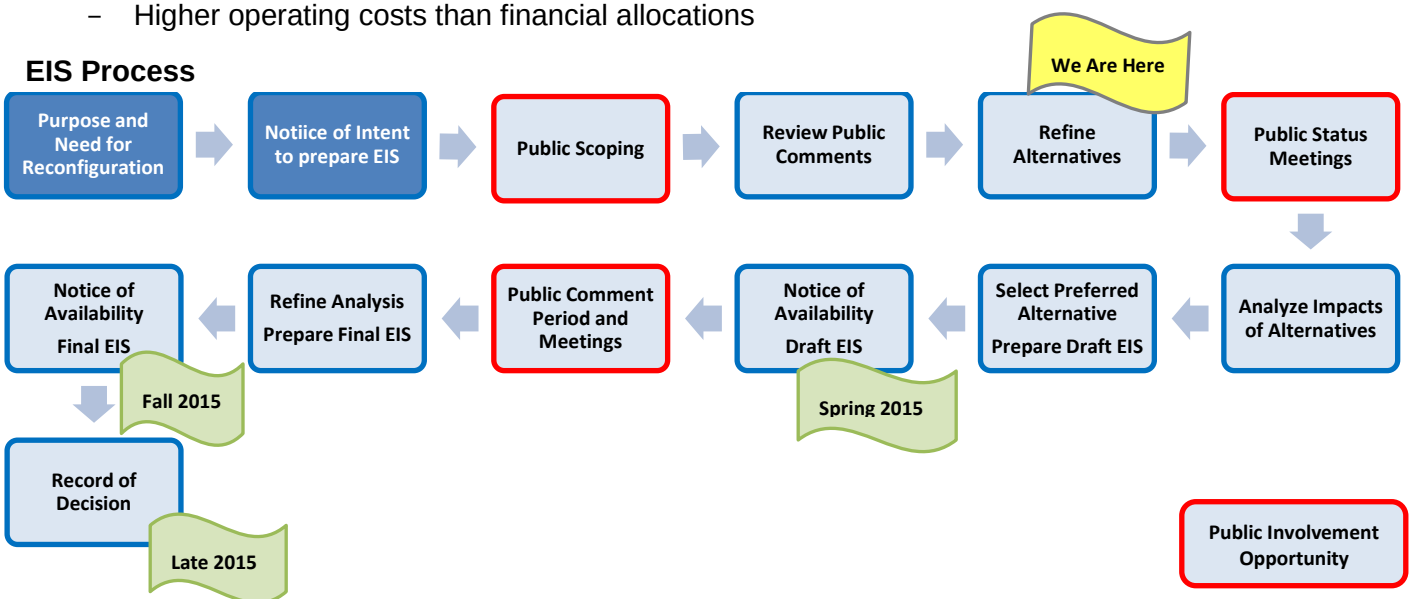
Scoping Process

- Involve public with identifying the issues and resources to evaluate in the EIS
- Receive public and agency input on alternatives, impacts, and mitigation options
- Use comments in preparing EIS

Purpose of and Need for Health Care System Reconfiguration

- ***Purpose*:** Provide quality, safe, accessible health care for Veterans well into the 21st century by:
  - Enhancing and maintaining quality and safety of care in the 100,000-square-mile service area
  - Replacing aging and ADA-noncompliant buildings for Veterans in Residential Rehabilitation and Treatment Programs and Community-Based Outpatient Clinics
  - Increasing access to care closer to Veterans' homes
  - Reducing out-of-pocket expenses for Veterans' travel
- ***Need:***
  - Veteran population centers are not in the same location as current VA facilities
  - Difficulty recruiting and retaining qualified staff at Hot Springs facility
  - Difficulty maintaining high-quality, safe, and accessible care
  - Long distances and travel times to receive specialty care
  - Current residential treatment facilities and locations limit care available to single parent Veterans and handicapped Veterans, and limit enhancements of the recovery model of care
  - Higher operating costs than financial allocations

EIS Process



Alternatives

	Hot Springs	Rapid City
A	CBOC – build/lease; vacate VA campus	MSOC, RRTP (100 beds) – build/lease
B	CBOC, RRTP (100 beds) – build/lease; vacate VA campus	MSOC – build/lease
C	CBOC – renovate Bldg 12; RRTP (100 beds) – renovate Domiciliary	MSOC – build/lease
D	CBOC, RRTP (24 beds) – build/lease; vacate VA campus	MSOC, RRTP (76 beds) – build/lease
E*	RRTP (200 beds) – renovate Domiciliary; Bldg 12 (inpatient) – renovate; other upgrades/renovations – new programs & services	no change
F	to be determined	to be determined
G**	future re-use of all or part of VA campus	no change
H	no action – status quo	no action – status quo

* "Save the VA" ** Supplement to Alternatives A–D CBOC – Community Based Outpatient Clinic
MSOC – Multi Specialty Outpatient Clinic RRTP – Residential Rehabilitation Treatment Program

"Save the VA" Alternative

- Renovate existing hospital and domiciliary instead of *construction* or *lease* of a new facility.
- Expand and restore hospital healthcare services at Hot Springs VA for a length of time (recommended 10 years) to get baseline data regarding Veteran need for and access to healthcare, on which to support future alignment plans.
- Engage Compensated Work Therapy (CWT) Veterans and teach historic building preservation standards and methods to support VA maintenance program of the National Historic Landmark and other recognized historic structures in the Black Hills.
- Expand on educational opportunities for Veterans and staff in the catchment area, including the Pine Ridge Indian Reservation.
- Undertake expanded study of effectiveness of PTSD/TBI/ Substance Abuse Treatment in a therapeutic **rural setting**.
- Utilize expanded work-therapy programs, educational opportunities, and physical and mental programs to treat homeless Veterans, and assist unemployed and underemployed Veterans.

Analysis of Environmental Resources

Human Environment	
Aesthetics	Community Services
Cultural Resources	Solid / Hazardous Materials
Noise	Transportation / Parking
Land Use	Utilities
Socioeconomics	Environmental Justice
Physical Environment	
Air Quality	Geology / Soils
Floodplains / Wetlands	Hydrology / Water Quality
Biological Environment	
Wildlife / Habitat	

National Historic Preservation Act (NHPA)

- Requires a federal agency to determine the effects of their action on historic properties
- Regulations permit "substitution" of NEPA review for the Section 106 compliance process
- Identify consulting parties during scoping process
- Identify and evaluate historic properties concurrently with other resources
- Consult with tribal governments
- Assess potential effects to Battle Mountain Sanitarium National Historic Landmark and other cultural resources
- Opportunities for input from consulting parties and public before releasing Draft EIS (see EIS process graph)
- Commit to mitigation strategy in Record of Decision if preferred alternative affects a historic property

Photos: Battle Mountain Sanitarium Building 1 – Rotunda (top); vintage aerial view (bottom)

APPENDIX B

Consulting Parties Workshop Attendee List

Consulting Parties Section 106 Workshop Attendee List		
Organization	**Representative (s)**	**Workshop Attended**
Advisory Council for Historic Preservation	Chris Daniel	Hot Springs, Pine Ridge
City of Hot Springs	Cindy Donnell	Hot Springs, Pine Ridge
	Scott Simianer	Hot Springs, Pine Ridge
Department of the Interior, National Park Service	Dena Sanford	Hot Springs, Pine Ridge
Fall River County Commission Office	Mike Ortner	Hot Springs
Hot Springs Certified Local Government–Historic Preservation Commission	Brian Powers	Hot Springs
	Pat Lyke	Hot Springs, Pine Ridge
National Trust for Historic Preservation	Jenny Buddenborg	Hot Springs, Pine Ridge
	Betsy Merritt	Pine Ridge
Oglala Sioux Tribe of the Pine Ridge Reservations	Regina Brave	Pine Ridge
Save the VA	Bob Nelson	Hot Springs, Pine Ridge
	Amanda Campbell	Hot Springs
South Dakota State Historic Preservation Office	Paige Olson	Hot Springs, Pine Ridge

APPENDIX C

Consulting Parties Workshop Handout and Displays

November 18-19, 2014

RECONFIGURATION OF BLACK HILLS HEALTH CARE SYSTEM

National Historic Preservation Act, Section 106
Consulting Parties Workshop

Agenda:

1. Welcome and introductions
2. Role of Consulting Party
3. Workshop process and ground rules
4. Federal undertaking and alternatives
5. Public scoping comments on historic properties and Section 106
6. Area of Potential Effects
7. Discussion and identification of historic properties
8. Discussion of potential effects to historic properties
9. Discussion of options to avoid, minimize, or mitigate adverse effects
10. Next steps

Role of the Consulting Party:

Section 106 of the National Historic Preservation Act requires federal agencies to consider the effects of their undertakings on historic properties. Section 106 regulations (36 CFR 800.16) define consultation as:

> *". . . the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process."*

Advisory Council on Historic Preservation's *Citizens Guide to Section 106 Review* further explains consulting party participation and offers tips to make the most of consultation:

> *Consulting party status entitles you to share your views, receive and review pertinent information, offer ideas, and consider possible solutions together with the federal agency and other consulting parties.*
>
> *Consultation does not mandate a specific outcome. Rather, it is the process of seeking, discussing, and considering the views of consulting parties about how project effects on historic properties should be handled.*
>
> *Creative ideas about alternatives – not complaints – are the hallmarks of effective consultation.*

Consulting parties will assist VA in this process by:

- identifying historic properties;
- identifying and evaluating potential effects to those historic properties;
- recommending options to avoid, minimize, or mitigate adverse effects;
- reviewing information on VA's findings and plans for the undertaking;
- participating in teleconferences, workshops, and meetings; and
- assuming a specific role, as appropriate, in any agreements necessary to resolve adverse effects on historic properties.

Making the Most of Consultation:

Often consultation involves participants with a wide variety of concerns and goals. While the focus of some may be historical preservation, the focus of others may be time, cost, and the purpose to be served by the project.

Effective consultation occurs when you:

- keep an open mind;
- state your interests clearly;
- acknowledge that others have legitimate interests, and seek to understand and accommodate them;
- consider a wide range of options;
- identify shared goals and seek options that allow mutual gain; and
- bring forward solutions that meet the agency's needs.

Undertaking (Federal Action): Proposed Reconfiguration of VA Black Hills Health Care System

Alternatives for Proposed Reconfiguration of VA Black Hills Health Care System:

Alternative	Hot Springs	Rapid City
A	Build or lease new CBOC *Vacate VA Battle Mountain campus*	Build or lease new MSOC and 100-bed RRTP
B	Build or lease new CBOC and 100-bed RRTP *Vacate VA Battle Mountain campus*	Build or lease new MSOC
C	*Renovate Building 12* for CBOC *Renovate Domiciliary* for 100-bed RRTP	Build or lease new MSOC
D	Build or lease new CBOC and 24-bed RRTP *Vacate VA Battle Mountain campus*	Build or lease new MSOC and 76-bed RRTP
E **"Save the VA"**	*Renovate Domiciliary* for 200-bed RRTP *Renovate Building 12* for inpatient care *Other upgrades/renovations to buildings* *New programs and services at Battle Mountain*	No change
F **No Action**	Continue inpatient/outpatient services at Battle Mountain	No change
G	*Future re-use of all or part of Battle Mountain campus*, as supplement to Alternatives A–D.	No change
CBOC = Community Based Outpatient Clinic RRTP = Residential Rehabilitation Treatment Program MSOC = Multi Specialty Outpatient Clinic		

References:

A Citizen's Guide to Section 106 Review: www.achp.gov/docs/CitizenGuide.pdf

Useful Resources on the Web: www.achp.gov/106course-resources.html

Section 106 for Users: www.achp.gov/usersguide.html

Section 106 Regulations Summary: www.achp.gov/106summary.html

NEPA/NHPA Handbook for Integrating NEPA and Section 106:
www.achp.gov/docs/NEPA_NHPA_Section_106_Handbook_Mar2013.pdf

TERMS AND DEFINITIONS

Criteria of adverse effect: An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative (Section 106, 36 CFR 800.5 Assessment of Adverse Effects).

Examples of adverse effects (the "Criteria of Adverse Effect")

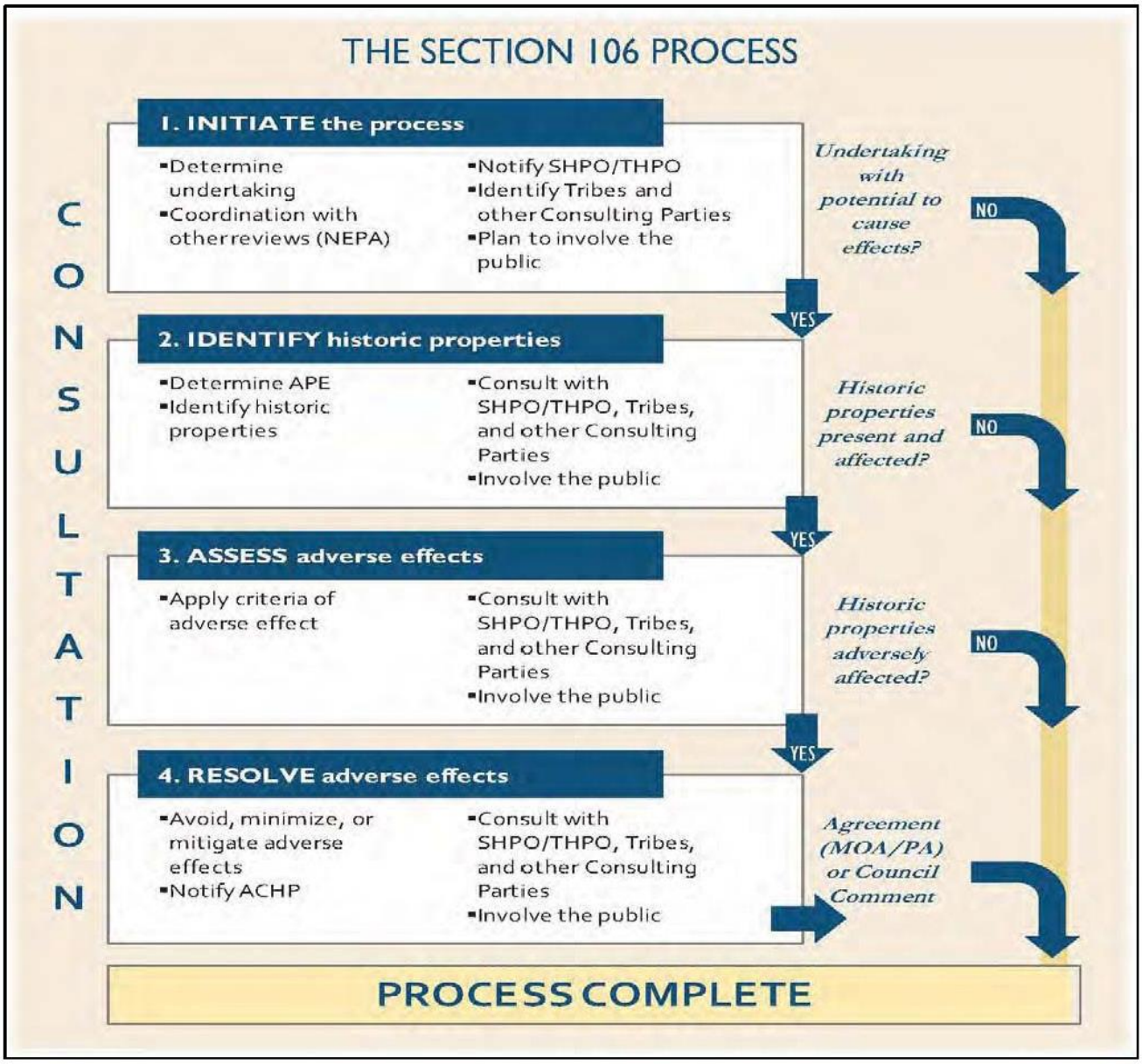
Adverse effects on historic properties include, but are not limited to:

1. physical destruction of or damage to all or part of the property;
2. alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;
3. removal of the property from its historic location;
4. change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
5. introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
6. neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe; and
7. transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

Area of potential effects (APE): 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.

Historic property: any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior.

Undertaking: a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those conducted by or on behalf of a federal agency; those conducted with federal financial assistance; and those requiring a federal permit, license, or approval.



Source: NEPA/NHPA Handbook for Integrating NEPA and Section 106

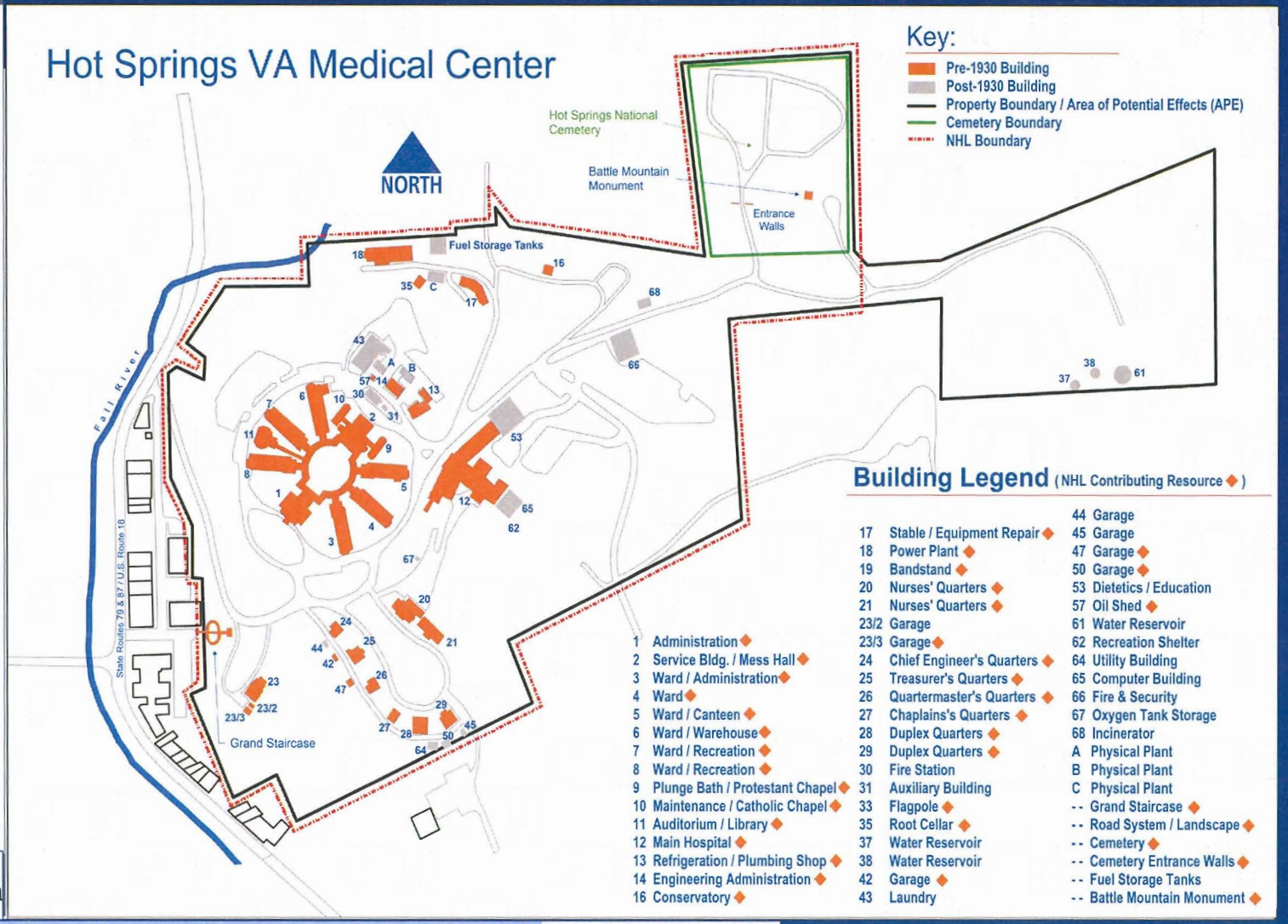
Proposed Area of Potential Effects for VA Black Hills Health Care System Reconfiguration

The Battle Mountain Branch of the National Home for Disabled Volunteer Soldiers was listed as a National Historic Landmark (NHL) in 2011.

Area of potential effects (APE) means 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 contributing resources (noted by the ◆ symbol in the Building Legend) of an NHL are buildings, sites, structures, or objects that add to the historical associations, historic architectural qualities, or archaeological values for which a property is nationally significant because they were present during the period of significance, relate to the documented significance of the property, and possess a high degree of historical integrity.

Black Hills Health Care System
Department of Veteran Affairs



Integrating *National Historic Preservation Act* Section 106 Compliance into the NEPA Process

Section 106 of the *National Historic Preservation Act:*

Federal agencies must:

- Identify and assess effects of actions on historic properties
- Avoid, minimize, or mitigate those effects
- Provide the Advisory council on Historic Preservation a reasonable opportunity to comment

Agencies are encouraged to coordinate Section 106 compliance with NEPA.

Federal regulations permit "substitution" of NEPA review for the Section 106 process. Historic properties analysis is integrated into NEPA public involvement, agency coordination, impact analysis, and the agency decision.

Black Hills Health Care System
Department of Veteran Affairs

Notify Consulting Parties and Initiate Consultation

- Secretary of the Interior, State Historic Preservation Officers, Advisory Council on Historic Preservation, Tribal Historic Preservation Officers and other tribal representatives, and other stakeholders.
- Identify/discuss historic preservation issues associated with the Black Hills Health Care System reconfiguration alternatives.

Identify Historic Properties and Traditional Cultural Properties

- Establish areas of potential effect for the EIS alternatives.
- Identify known and potential cultural resources and their status or eligibility for listing on the National Register.
- Document findings as the Affected Environment for cultural resources in the EIS.

Assess Potential Effects

- Evaluate potential impacts to cultural resources using Section 106 criteria.
- With consulting parties, identify measures to avoid, minimize, or mitigate effects on historic properties.
- Document findings in the EIS as part of the Environmental Consequences and Mitigation Measures for cultural resources impacts.

Additional Consultation and Public Involvement

- Provide adequate opportunity for consulting parties' input prior to finalizing the Draft EIS.
- Notify National Park Service of potential effects on the Battle Mountain Sanitarium, a National Historic Landmark.
- Provide ongoing information to the public on the Section 106 process and its integration into the NEPA process.
- Document all Section 106 consultation activities in the EIS and its Administrative Record.

Concluding Section 106 Consultation

- If preferred alternative can potentially affect a historic property, identify mitigation strategy: Memorandum of Agreement, Programmatic Agreement, other binding mitigation commitment made in the VA's Record of Decision.
- Implement the selected alternative and any associated mitigation.

Alternatives for Reconfiguration of VA Black Hills Health Care System

- All reasonable alternatives are evaluated in the EIS (40 CFR 1502.14).
- Reasonable alternatives are technically and economically practicable or feasible, and meet the purpose and need for the proposed action.
- The No Action alternative must be considered, and also provides a baseline for comparing impacts among alternatives.

Location	Alternatives*					
	A	B	C	D	E	F No Action
Hot Springs	CBOC New Location in Hot Springs ~~Existing VA Campus~~	CBOC New Location in Hot Springs RRTP 100 beds New Location in Hot Springs ~~Existing VA Campus~~	CBOC Building 12 Renovation RRTP–100 beds Domiciliary Renovation	CBOC New Location in Hot Springs RRTP 24 beds New Location in Hot Springs ~~Existing VA Campus~~	Continue inpatient services Building 12 Renovation RRTP–200 beds Domiciliary Renovation Other Upgrades / Renovations New programs & services	(No Change) Continue inpatient and outpatient services RRTP 100 beds Upgrades / Renovations Maintenance and clinical standards
Rapid City	MSOC RRTP 100 beds	MSOC	MSOC	MSOC RRTP 76 beds	CBOC (No Change)	CBOC (No Change)

*Scoping did not yield new action alternatives. "No Action," (previously "H") was re-labeled "F", which had been a placeholder.

**Alternative G: future re-use by others of all/part of Hot Springs VA campus; supplement to Alternatives A–D. Would include "Medical Miracle" proposal.

CBOC = Community Based Outpatient Clinic
MSOC = Multi Specialty Outpatient Clinic
RRTP = Residential Rehabilitation Treatment Program

Black Hills Health Care System
Department of Veteran Affairs

Section 106 Consultation for the Integrated National Environmental Policy Act and National Historic Preservation Act Process

Proposed Reconfiguration of VA Black Hills Health Care System

Summary of Consulting Parties Workshop
VA Medical Center, Hot Springs, South Dakota
February 12, 2015

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

April 2, 2015

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LIST OF ACRONYMS

APE: Area of potential effects
BHHCS: Black Hills Health Care System
CBOC: Community Based Outpatient Clinic
CFR: Code of Federal Regulations
EIS: Environmental Impact Statement
MSOC: Multi Specialty Outpatient Clinic
NEPA: National Environmental Policy Act
NHPA: National Historic Preservation Act
NHL: National Historic Landmark
NRHP: National Register of Historic Places
RRTP: Residential Rehabilitation Treatment Program
SCIP: Strategic Capital Investment Plan
SHPO: State Historic Preservation Office
VA: Veterans Affairs
VISN: Veterans Integrated Service Network

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1.0 INTRODUCTION

The Department of Veterans Affairs (VA) Black Hills Health Care System (VA BHHCS) has proposed to reconfigure health care services within the VA BHHCS service area, which VA has determined to be a federal undertaking under Section 106 of the National Historic Preservation Act (NHPA) and a federal action subject to the National Environmental Policy Act (NEPA). VA has chosen to integrate Section 106 consultation within the overall NEPA framework, following the substitution process of 36 Code of Federal Regulations (CFR) 800.8(c). VA is preparing an environmental impact statement (EIS) that will meet the standards for compliance with Section 106.

Three alternatives for the undertaking propose relocating services from the Hot Springs VA Medical Center campus to other Hot Springs and Rapid City locations, and three alternatives propose renovations to existing buildings on the campus instead of relocating services within the area. The proposed undertaking (federal action) would affect the campus, which is a National Historic Landmark (NHL) and a contributing element to the Hot Springs Historic District as listed on the National Register of Historic Places (NRHP).

1.1 Consulting Parties Involvement

Consulting parties, as defined in Section 106 of the NHPA, fall into five categories per 36 CFR 800.2(c): (1) the state historic preservation officer; (2) Indian tribes; (3) representatives of local governments; (4) applicants for federal assistance, permits, licenses and other approvals; and (5) additional consulting parties. This last category is defined as "Certain individuals and organizations with a demonstrated interest in the undertaking [who] may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties."

On February 12, 2015, VA hosted a second Section 106 workshop for the consulting parties at the VA Medical Center in Hot Springs, South Dakota. The workshop was a follow-on session to the November 2014 workshop. Table 1 lists the identified consulting parties who were invited to participate in the workshop and whether or not they attended. Other consulting parties may still be added as the integrated Section 106 consultation and NEPA EIS process continues.

1.2 Purpose of this Summary

The purposes of this summary are to document the discussions and input received during the February 2015 workshop, and to present the next steps for further consultation. This summary and the summary from the November 2014 workshop are available for review by the public at http://www.blackhills.va.gov/vablackhillsfuture.

Table 1. Workshop Invitations and Attendance

Organization*	Attended Workshop
Advisory Council on Historic Preservation	Yes
AFGE Hot Springs Local	Yes
American Legion	Yes
City of Hot Springs	Yes
Department of the Interior, National Park Service	Yes
Fall River County Commission Office	No
Fall River County Historical Society	Yes
Fort Peck Tribes of Assiniboine and Sioux	No
Hot Springs Certified Local Government–Historic Preservation Commission	Yes
Kiowa Tribe of Oklahoma	No
National Trust for Historic Preservation	Yes
Northern Arapaho Tribe	No
Oglala Sioux Tribe of the Pine Ridge Reservation	No
Save the VA	Yes
South Dakota State Historic Preservation Office	Yes
Yankton Sioux Tribe	No
* Includes all consulting parties identified as of the workshop date of February 12, 2015.	

2.0 WORKSHOP DISCUSSION

The Section 106 workshop participants included consulting party representatives (see Appendix A), VA staff, and the EIS contractor (Labat Environmental and SWCA Environmental Consultants). The workshop was open to public observation and members of the public attended. The handout with the agenda for the workshop is included in Appendix B.

The following sections summarize the discussion of each agenda topic. Responses and explanations, as appropriate for clarification, are included for some of the questions and issues raised during the discussions.

2.1 Omnibus Bill and Status of VA BHHCS Reconfiguration and EIS

The Consolidated and Further Continuing Appropriations Act, 2015, House Resolution 83, Public Law No. 113-235 – referred to as the Omnibus Bill – contained language pertaining to VA medical services and facilities in Veterans Integrated Service Network (VISN) 23. The application of that language to the proposed VA BHHCS reconfiguration and EIS is being reviewed by Veterans Health Administration Central Office. Until further direction is provided, VA BHHCS is proceeding with the EIS process that was initiated during fiscal year 2014.

Consulting parties also noted that line items in the President's budget for fiscal year 2016 and beyond appear to support certain alternatives for the proposed reconfiguration. None of the line items related to the reconfiguration proposal are requested in the fiscal year 2016 budget; instead

they are described in the Strategic Capital Investment Plan (SCIP) as "potential future year projects". They represent place holders to inform planning of potential future appropriations needs. Only one place holder can be realistically applied, not options for all alternatives. That one place holder was based on the originally proposed action for reconfiguration. All alternatives for reconfiguration will be assessed equally in the EIS.

2.2 NEPA/NHPA Substitution Process

Using the NEPA process for NHPA compliance is referred to as "substitution" and is guided by 36 CFR 800.8(c). The subsections of 800.8(c) were reviewed along with what VA has completed and will complete to ensure compliance with Section 106 consultation. Consulting parties were provided a copy of the Checklist for Substitution, which is Attachment C to the Handbook for Integrating NEPA and Section 106. The checklist and the review of 800.8(c) are included in Appendix C to this summary.

Consulting parties expressed concern regarding continued involvement of the public with Section 106. As noted during the review of 800.8(c), the public is involved in accordance with VA's NEPA procedures, which to date has included notices, news releases, 10 public scoping meetings, and an extended public scoping period (90 days) for the public to provide comments on environmental and historic preservation issues. Additional opportunities for public involvement will be during the review period for the Draft EIS and at six public comment meetings to be scheduled during the summer months of 2015. Consulting parties also noted their own constituencies, which encompass members of the public, such as the City of Hot Springs, Fall River County, State of South Dakota, Veterans' organizations, and groups and individuals interested in historic preservation.

Documents pertaining to Section 106 consultation are available for public review at www.blackhills.va.gov/vablackhillsfuture. Consulting parties are welcome to post information pertaining to the Section 106 consultation process on their respective websites as a means to further inform the public.

Consulting parties asked how historic properties, as compared to cultural resources in general, will be addressed in the EIS. The affected environment section (generally Chapter 3) of the EIS will provide the current and background contexts for all cultural resources, including historic properties, and explain what constitutes a significant cultural resource and historic property in relation to the NEPA definition and NRHP eligibility, plus properties of traditional religious or cultural importance to American Indian tribes (per 36 CFR 800). The impact analysis section (generally Chapter 4) of the EIS will describe the basis for an effect on a resource, including historic properties typically subject to effects as defined in Section 106 regulations. Other cultural resources that do not qualify as significant or as historic properties are considered under other appropriate regulations and executive orders.

2.3 Additional Detail on Alternatives

Additional details on the types of facilities and accommodations for a community-based outpatient clinic (CBOC), multi-specialty outpatient clinic (MSOC), and residential rehabilitation treatment program (RRTP) that are being considered under each alternative were provided, including basic space requirements for each building type and renovation requirements for existing buildings to

meet current "recovery model of care" standards. Example photos of similar buildings at other VA locations were shown.

It was emphasized that primary care will continue in Hot Springs under all alternatives. VA requests the consulting parties' assistance in correcting misconceptions to this component of the alternatives in the press, social media, or other sources whenever they occur.

2.4 Area of Potential Effects Revision

VA adjusted the APE after review and consideration of input received from consulting parties during the November 2014 workshop and written letters submitted by consulting parties subsequent to that workshop. The adjusted APE was provided to the State Historic Preservation Officer (SHPO) and copied to all other consulting parties on January 20, 2015. VA's letter with a figure showing the adjusted APE is available at www.blackhills.va.gov/vablackhillsfuture. Consulting parties expressed concern that Fort Meade and the State Veterans Home were not included within the adjusted APE, and again asked how VA would address unknown locations for possible acquisition for construction or renovation within Hot Springs and Rapid City under Alternatives A, B, and D.

As discussed during the November workshop and included in the written summary, VA would initiate the phased process for identification and evaluation of historic properties following 36 CFR 800.4(b)(2), and would determine other APEs should the selected reconfiguration alternative include new construction or renovation at locations that would be identified at a future time. Until then, VA will include the entire municipal boundaries of the cities of Hot Springs and Rapid City in the defined boundary of the APE, as shown on the figures included in Appendix D.

As explained in VA's adjusted APE letter dated January 20, 2015, construction at Fort Meade needed for ongoing operation of the hospital was independent (not connected) of the need for the proposed reconfiguration of health care services. Connected actions are those that could not or would not proceed unless another action proceeds previously or simultaneously (40 CFR 1508.25(a)(1(ii)). VA continues to consider the entire VA BHHCS service area as the EIS study area for cultural resources; however, no connected actions have been identified at other locations within the service area where effects from the proposed reconfiguration (undertaking) would extend, and thus, no expansion is made to the APE beyond the cities of Hot Spring and Rapid City.

2.5 Identification of Historic Properties

The principal historic properties that have been identified that would be affected by the undertaking remain the Battle Mountain Sanitarium NHL and the Hot Springs Historic District. The springhouse located near Fall River and currently used to supply water to the VA Medical Center campus has since been found to be historic and connected directly with the historic use of the Battle Mountain Sanitarium. The Battle Mountain landform has also been identified as a historic property related to the history of American Indian activity in the area and the importance of the hot springs. Unknown locations for potential new or renovated facility development in the cities of Hot Springs or Rapid City could affect other archaeological or above-ground historic properties.

In addition to considering the Battle Mountain landform as a sacred place to tribes, consulting parties also recommended that Battle Mountain Sanitarium be considered a traditional cultural property to Veterans. Traditional cultural properties are defined and considered under National Register Bulletin 38 (Parker and King 1998); VA will use this bulletin for further review of the Sanitarium as such.

2.6 Potential Effects

The approach to identifying potential effects, and then assessing and resolving adverse effects was presented. The approach separates on-campus from off-campus actions and effects. The on-campus actions focus on renovation or relocation, and off-campus actions focus on location of either Hot Springs or Rapid City. The alternatives are assigned by action (renovation or relocation) and location (Hot Springs or Rapid City).

Many of the potential effects are similar across the alternatives due to the similar components of the alternatives. For example, renovation of buildings or facilitation of their reuse would potentially affect the Battle Mountain Sanitarium NHL and historic properties within its views in the Hot Springs Historic District and the Hot Springs/Battle Mountain traditional area. Construction or renovation of other facilities at unknown locations in the Hot Springs or Rapid City areas could potentially affect archaeological sites or historic buildings at these locations or in view of the locations.

The identification of potential effects considered the following issues:

- Potential for archaeological resources discovery.
- Integrity aspects of feeling and association, as intangible historic qualities, may be affected through reuse of properties.
- Risk of building deterioration or removal with changes in use.
- Risk in historic building deterioration/neglect with short-term vacancy should a gap in occupancy occur to the NHL.
- Some areas on campus, specifically the sweat lodge, the east wing addition to Building 12, and the inner circle of the Domiciliary, have been formally blessed by Native American spiritual leaders.

Concerns for resources and effects identified during the November 2014 workshop were reviewed against examples of adverse effects listed in 36 CFR 800.5(a)(2). The list of these concerns by alternative was part of the workshop handout (included in Appendix B) and reorganized by the approach described above for identifying potential effects. The list will be further refined and will be the focus of the next consultation workshop with consulting parties.

Overall, allotted meeting time ran short by the time this agenda topic was reached, which limited productive discussion.

2.7 Avoiding, Minimizing, or Mitigating Adverse Effects

Commitments to historic preservation, conditions of approval, and stipulations and measures for treatment of historic properties would be specified in the Record of Decision for the EIS. The Secretary of the Interior's Standards for the Treatment of Historic Properties will guide the identification of measures to avoid, minimize, or mitigate adverse effects to historic properties. Preservation and rehabilitation are applicable treatments defined under those standards. Preservation seeks to maintain the significant historic aspects of a property, while rehabilitation does the same with allowances for mechanical, access, and life safety alterations or additions to properties; both recommend appropriate reuse of historic properties.

It was noted that NHPA Section 110(f) states a federal agency should minimize harm "to the maximum extent possible" if an undertaking affects a NHL. However, "maximum extent possible" is not defined and VA and National Park Service were asked for examples of what is viewed as a higher standard in terms of considering effects and resolutions. Maintaining historic use and aspects of historic feeling and association were briefly discussed in the context of considerations for resolution (including avoidance) of effects.

Overall, allotted meeting time ran short by the time this agenda topic was reached, which limited productive discussion.

3.0 NEXT STEPS

Next steps, some of which overlap, include:

- Draft EIS Publication and Identification of Preferred Alternative: VA will provide a schedule update when available.

- Identification of Historic Properties: VA will list historic properties in the Draft EIS that are located within the revised/expanded APE. VA will continue to review cultural resource management data from previous projects addressing the Battle Mountain landform, and will consider traditional cultural property status for the Battle Mountain Sanitarium NHL. The results of this review will be considered in the analyses presented in the Draft EIS, and will also be part of continued consultation.

- Resolution of Adverse Effects: VA will continue to develop measures to resolve adverse effects with the consulting parties and through the EIS analysis, including assessment of minimizing harm to the NHL to "the maximum extent possible".

- Future Consultation: The list of potential effects with adverse effects criteria, and potential measures to resolve effects determined to be adverse, will be the focus of further consultation with the consulting parties via teleconference.

4.0 OTHER COMMENTS

Comments made that were not directly related to agenda topics under discussion were deferred to be addressed as time allowed in the agenda or to be addressed through another avenue, such as through assessment in the EIS. These comments were not dismissed, but were considered not pertinent to the topic of historic properties and potential effects to them. Those comments and responses are as follows:

- Record future Section 106 consultation discussions and provide transcripts for review by consulting parties and the public. Response: It is not standard practice for VA to transcribe 106 consultation meetings for the record; however, VA will consider the request.
- Hold a public meeting focusing on the Section 106 process to inform the public and receive further public comments. Response: VA conducted 10 public scoping meetings to explain the integrated NEPA/NHPA process and to receive public comments on the undertaking (federal action), historic properties and preservation, and other related concerns. Consulting parties are welcome to post information pertaining to the Section 106 consultation process on their respective websites as a means to further inform the public.
- Provide more information regarding the clinical standards that are in place that VA follows as part of their mission to provide care to Veterans to better understand Alternative F-No Action. Response: VA's mission to provide health care and the standards by which that care is provided will be described briefly in the Draft EIS to the extent it is related to the purpose of and need for action or to differentiate among the alternatives. VA offers information on health care issues and benefits topics online at http://www.va.gov/health/.

5.0 REFERENCES

Parker, Patricia L., and Thomas F. King
1998 Guidelines for Evaluating and Documenting Traditional Cultural Properties. National Park Bulletin No. 38. Available at: http://www.nps.gov/nr/publications/bulletins/pdfs/nrb38.pdf.

APPENDIX A

Consulting Party Workshop Attendee List

Organization	Representative(s)
Advisory Council on Historic Preservation	Chris Daniel
AFGE Hot Springs Local	Pat Russell
American Legion	Ken Orrock
City of Hot Springs	Cindy Donnell
Department of the Interior, National Park Service	Dena Sanford
Fall River County Historical Society	Peggy Sanders
Hot Springs Certified Local Government–Historic Preservation Commission	Pat Lyke
National Trust for Historic Preservation	Jenny Buddenborg
	Amy Cole
Save the VA	Bob Nelson
	Amanda Campbell
South Dakota State Historic Preservation Office	Paige Olson
	Ted Spencer

APPENDIX B

Consulting Party Workshop Agenda and Handout

February 12, 2015

RECONFIGURATION OF BLACK HILLS HEALTH CARE SYSTEM

National Historic Preservation Act, Section 106
Consulting Parties Workshop

AGENDA

9:00 a.m. – 4:00 p.m.

1. Welcome and introductions
2. Omnibus Bill and status of BHHCS Reconfiguration and EIS
3. Objectives for workshop and brief recap from November workshop
4. NHPA/NEPA substitution process
5. Additional detail on reconfiguration alternatives
6. Area of Potential Effects as revised
7. Discussion of identified historic properties
8. Discussion of preliminary consideration on potential effects on identified historic properties
9. Discussion of preliminary considerations for avoiding, minimizing, or mitigating adverse effects
10. Next steps

Lunch Break 12:00 – 1:00 p.m.

TERMS AND DEFINITIONS

Criteria of adverse effect: An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative (Section 106, 36 CFR § 800.5 Assessment of Adverse Effects).

Examples of adverse effects (the "Criteria of Adverse Effect")

Adverse effects on historic properties include, but are not limited to:

1. physical destruction of or damage to all or part of the property;
2. alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
3. removal of the property from its historic location;
4. change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

5. introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
6. neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe or Native Hawaiian organization; and
7. transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

Area of potential effects (APE): 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.

Historic property: any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior.

Undertaking: a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those conducted by or on behalf of a federal agency; those conducted with federal financial assistance; and those requiring a federal permit, license, or approval.

REFERENCES

A Citizen's Guide to Section 106 Review: www.achp.gov/docs/CitizenGuide.pdf

Useful Resources on the Web: www.achp.gov/106course-resources.html

Section 106 for Users: www.achp.gov/usersguide.html

NEPA/NHPA Handbook for Integrating NEPA and Section 106:
www.achp.gov/docs/NEPA_NHPA_Section_106_Handbook_Mar2013.pdf

Secretary of the Interior's Standards for the Treatment of Historic Properties:
http://www.nps.gov/tps/standards/four-treatments/treatment-guidelines.pdf

National Park Service Preservation Brief No. 31 – Mothballing Historic Buildings
http://www.nps.gov/tps/how-to-preserve/preservedocs/preservation-briefs/31Preserve-Brief-Mothballing.pdf

introduction

Choosing an Appropriate Treatment for the Historic Building

-INTRODUCTION-

Choosing Treatment

Using the Standards + Guidelines

-Historical Overview-

Exterior Materials
Masonry
Wood
Architectural Metals

Exterior Features
Roofs
Windows
Entrances + Porches
Storefronts

Interior Features
Structural System
Spaces/Features/Finishes
Mechanical Systems

Site

Setting

Special Requirements
Energy Efficiency
Accessibility
Health + Safety
New Additions

The Standards are neither technical nor prescriptive, but are intended to promote responsible preservation practices that help protect our Nation's irreplaceable cultural resources. For example, they cannot, in and of themselves, be used to make essential decisions about which features of the historic building should be saved and which can be changed. But once a treatment is selected, the Standards provide philosophical consistency to the work.

The four treatment approaches are Preservation, Rehabilitation, Restoration, and Reconstruction, outlined below in hierarchical order and explained:

The first treatment, **Preservation**, places a high premium on the retention of all historic fabric through conservation, maintenance and repair. It reflects a building's continuum over time, through successive occupancies, and the respectful changes and alterations that are made.

Rehabilitation, the second treatment, emphasizes the retention and repair of historic materials, but more latitude is provided for replacement because it is assumed the property is more deteriorated prior to work. (Both Preservation and Rehabilitation standards focus attention on the preservation of those materials, features, finishes, spaces, and spatial relationships that, together, give a property its historic character.)

Restoration, the third treatment, focuses on the retention of materials from the most significant time in a property's history, while permitting the removal of materials from other periods.

Reconstruction, the fourth treatment, establishes limited opportunities to re-create a non-surviving site, landscape, building, structure, or object in all new materials.

Choosing the most appropriate treatment for a building requires careful decision-making about a building's historical significance, as well taking into account a number of other considerations:

Relative importance in history. Is the building a nationally significant resource--a rare survivor or the work of a master architect or craftsman? Did an important event take place in it? National Historic Landmarks, designated for their "exceptional significance in American history," or many buildings individually listed in the National Register often warrant Preservation or Restoration. Buildings that contribute to the significance of a historic district but are not individually listed in the National Register more frequently undergo Rehabilitation for a compatible new use.

Physical condition. What is the existing condition–or degree of material integrity–of the building prior to work? Has the original form survived largely intact or has it been altered over time? Are the alterations an important part of the building's history? Preservation may be appropriate if distinctive materials, features, and spaces are essentially intact and convey the building's historical significance. If the building requires more extensive repair and replacement, or if alterations or additions are necessary for a new use, then Rehabilitation is probably the most appropriate treatment. These key questions play major roles in determining what treatment is selected.

Proposed use. An essential, practical question to ask is: Will the building be used as it was historically or will it be given a new use? Many historic buildings can be adapted for new uses without seriously damaging their historic character; special-use properties such as grain

silos, forts, ice houses, or windmills may be extremely difficult to adapt to new uses without major intervention and a resulting loss of historic character and even integrity.

Mandated code requirements. Regardless of the treatment, code requirements will need to be taken into consideration. But if hastily or poorly designed, a series of code-required actions may jeopardize a building's materials as well as its historic character. Thus, if a building needs to be seismically upgraded, modifications to the historic appearance should be minimal. Abatement of lead paint and asbestos within historic buildings requires particular care if important historic finishes are not to be adversely affected. Finally, alterations and new construction needed to meet accessibility requirements under the Americans with Disabilities Act of 1990 should be designed to minimize material loss and visual change to a historic building.

historical overview - **PRESERVING** - **REHABILITATING** - **RESTORING** - **RECONSTRUCTING** main - credits - email

www.nps.gov/tps/standards/four-treatments/standguide/overview/choose_treat.htm

Some of the web versions of the Preservation Briefs differ somewhat from the printed versions. Many illustrations are new and in color; Captions are simplified and some complex charts are omitted. To order hard copies of the Briefs, see Printed Publications.

PRESERVATION BRIEFS

31
Mothballing Historic Buildings

Sharon C. Park, AIA

Documentation

Stabilization

Mothballing

Mothballing Checklist

Maintenance Chart

Summary and References

Reading List

Download the PDF

Appropriately mothballed historic building. Photo: NPS files.

When all means of finding a productive use for a historic building have been exhausted or when funds are not currently available to put a deteriorating structure into a useable condition, it may be necessary to close up the building temporarily to protect it from the weather as well as to secure it from vandalism. This process, known as mothballing, can be a necessary and effective means of protecting the building while planning the property's future, or raising money for a preservation, rehabilitation or restoration project. If a vacant property has been declared unsafe by building officials, stabilization and mothballing may be the only way to protect it from demolition.

This Preservation Brief focuses on the steps needed to "de-activate" a property for an extended period of time. The project team will usually consist of an architect, historian, preservation specialist, sometimes a structural engineer, and a contractor. Mothballing should not be done without careful planning to ensure that needed physical repairs are made prior to securing the building. The steps discussed in this Brief can protect buildings for periods of up to ten years; long-term success

This building has been successfully mothballed for 10 years because the roof and walls were repaired and structurally stabilized, ventilation louvers added, and the property maintained. Photo: NPS files.

will also depend on continued, although somewhat limited, monitoring and maintenance. For all but the simplest projects, hiring a team of preservation specialists is recommended to assess the specific needs of the structure and to develop an effective mothballing program.

A vacant historic building cannot survive indefinitely in a boarded-up condition, and so even marginal interim uses where there is regular activity and monitoring, such as a caretaker residence or non-flammable storage, are generally preferable to mothballing. In a few limited cases when the vacant building is in good condition and in a location where it can be watched and checked regularly, closing and locking the door, setting heat levels at just above freezing, and securing the windows may provide sufficient protection for a period of a few years.

But if long-term mothballing is the only remaining option, it must be done properly. This will require stabilization of the exterior, properly designed security protection, generally some form of interior ventilation—either through mechanical or natural air exchange systems—and continued maintenance and surveillance monitoring.

Boarding up without adequate ventilation and maintenance has accelerated deterioration of this property. Photo: NPS files.

Comprehensive mothballing programs are generally expensive and may cost 10% or more of a modest rehabilitation budget. However, the money spent on well-planned protective measures will seem small when amortized over the life of the resource. Regardless of the location and condition of the property or the funding available, the following 9 steps are involved in properly mothballing a building:

Documentation

1. Document the architectural and historical significance of the building.
2. Prepare a condition assessment of the building.

Stabilization

3. Structurally stabilize the building, based on a professional condition assessment.
4. Exterminate or control pests, including termites and rodents.
5. Protect the exterior from moisture penetration.

Mothballing

6. Secure the building and its component features to reduce vandalism or break-ins.
7. Provide adequate ventilation to the interior.
8. Secure or modify utilities and mechanical systems.
9. Develop and implement a maintenance and monitoring plan for protection.

These steps will be discussed in sequence below. Documentation and stabilization are critical components of the process and should not be skipped over. Mothballing measures should not result in permanent damage, and so each treatment should be weighed in terms of its reversibility and its overall benefit.

Table 2. Potential Effects Identified by Alternative

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
A	Build or lease new CBOC Vacate VA Hot Springs campus	Build or lease new MSOC and 100-bed RRTP	➢ The new location may impact the historic district including viewshed, traffic, and other concerns. ➢ City infrastructure may be impacted due to a decline in rate of use and customer base. Possibility exists that the infrastructure is also historic. ➢ Potential for archaeological sites at new locations. ➢ Potential for archaeological sites on Hot Springs (Battle Mountain) campus, including a historic-era VA dump area. ➢ Battle Mountain and waters (Fall River and associated hot springs) as possible historic property concern related to Native American history. ➢ Re-Use Options. Future management of the property. VA's Property Disposition Process [to be initiated if alternatives are chosen that vacate the Hot Springs campus]. ➢ Change of use if the campus is no longer used as a medical facility. ➢ Vacant building; damage during mothballing. ➢ Native American access to the VA sweat lodge facility may be limited. ➢ Water rights retained by the VA. ➢ Local government tax-base impacts. ➢ Removing VA from the property and the impacts to Hot Springs as the "Veterans Town." ➢ Potential degradation of the National Historic Landmark and the Hot Springs Historic District. ➢ Museum collections and records currently stored at the campus will need to be rehoused if the campus is vacated. ➢ Consideration of cumulative effects per Section 106. ➢ Potential effect to the State Veterans Home due to changes in VA services in the area. ➢ Potential effect to the National Cemetery management, which currently relies on co-location with VA health services at the Hot Springs (Battle Mountain) campus.

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
B (same potential effects identified as Alternative A)	Build or lease new CBOC and 100-bed RRTP Vacate VA Hot Springs campus	Build or lease new MSOC	➢ The new location may impact the historic district including viewshed, traffic, and other concerns. ➢ City infrastructure may be impacted due to a decline in rate of use and customer base. Possibility exists that the infrastructure is also historic. ➢ Potential for archaeological sites at new locations. ➢ Potential for archaeological sites on Hot Springs (Battle Mountain) campus, including a historic-era VA dump area. ➢ Battle Mountain and waters (Fall River and associated hot springs) as possible historic property concern related to Native American history. ➢ Re-Use Options. Future management of the property. VA's Property Disposition Process [to be initiated if alternatives are chosen that vacate the Hot Springs campus]. ➢ Change of use if the campus is no longer used as a medical facility. ➢ Vacant building; damage during mothballing. ➢ Native American access to the VA sweat lodge facility may be limited. ➢ Water rights retained by the VA. ➢ Local government tax-base impacts. ➢ Removing VA from the property and the impacts to Hot Springs as the "Veterans Town." ➢ Potential degradation of the National Historic Landmark and the Hot Springs Historic District. ➢ Museum collections and records currently stored at the campus will need to be rehoused if the campus is vacated. ➢ Consideration of cumulative effects per Section 106. ➢ Potential effect to the State Veterans Home due to changes in VA services in the area. ➢ Potential effect to the National Cemetery management, which currently relies on co-location with VA health services at the Hot Springs (Battle Mountain) campus.
C	Renovate Building 12 for CBOC Renovate Domiciliary for 100-bed RRTP	Build or lease new MSOC	➢ Building exteriors may be potentially altered for rehabilitation or reuse. ➢ Vacate portions of buildings or entire buildings on the campus. ➢ Change in use of some of the buildings. ➢ Potential for maintenance neglect. ➢ Renovation is a positive effect for continued use of the property. ➢ Continued VA ownership ensures compliance with historic preservation laws.

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
D (same potential effects identified as Alternatives A and B)	Build or lease new CBOC and 24-bed RRTP Vacate VA Hot Springs campus	Build or lease new MSOC and 76-bed RRTP	➢ The new location may impact the historic district including viewshed, traffic, and other concerns. ➢ City infrastructure may be impacted due to a decline in rate of use and customer base. Possibility exists that the infrastructure is also historic. ➢ Potential for archaeological sites at new locations. ➢ Potential for archaeological sites on Hot Springs (Battle Mountain) campus, including a historic-era VA dump area. ➢ Battle Mountain and waters (Fall River and associated hot springs) as possible historic property concern related to Native American history. ➢ Re-Use Options. Future management of the property. VA's Property Disposition Process [to be initiated if alternatives are chosen that vacate the Hot Springs campus]. ➢ Change of use if the campus is no longer used as a medical facility. ➢ Vacant building; damage during mothballing. ➢ Native American access to the VA sweat lodge facility may be limited. ➢ Water rights retained by the VA. ➢ Local government tax-base impacts. ➢ Removing VA from the property and the impacts to Hot Springs as the "Veterans Town." ➢ Potential degradation of the National Historic Landmark and the Hot Springs Historic District. ➢ Museum collections and records currently stored at the campus will need to be rehoused if the campus is vacated. ➢ Consideration of cumulative effects per Section 106. ➢ Potential effect to the State Veterans Home due to changes in VA services in the area. ➢ Potential effect to the National Cemetery management, which currently relies on co-location with VA health services at the Hot Springs (Battle Mountain) campus.

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
E (Save the VA)	Renovate domiciliary for 200-bed RRTP Renovate Building 12 for inpatient care Other upgrades/ renovations to buildings/new construction New programs and services at Hot Springs campus	No change	➢ Will restore/renew services to the campus (see "Save the VA" White Paper) ensuring continued use of all the historic buildings. ➢ Facility continues to be maintained. ➢ Disabled access alterations on building exteriors including ramps and sidewalk upgrades. ➢ Upgrades and renovations may have a potential effect on the historic property. ➢ Potential for archaeological sites on Hot Springs (Battle Mountain) campus where new construction would occur. ➢ Location of new construction may impact the historic landmark including viewshed, traffic, and other concerns.
F (No Action)	Continue health care services at VA Hot Springs campus	No change	➢ Facility continues to be maintained. ➢ Retains historic use.

Alternative	Proposed Changes in Hot Springs	Proposed Changes in Rapid City	Potential Effects or Historic Property Concerns
G	Future re-use of all or part of VA Hot Springs campus	No change	➢ Re-Use Options. Future management of the property. VA's Property Disposition Process [to be initiated if alternatives are chosen that vacate the Hot Springs campus]. ➢ Change of use if the campus is no longer used as a medical facility. ➢ Removing VA from the property and the impacts to Hot Springs as the "Veterans Town." ➢ Potential degradation of the National Historic Landmark and the Hot Springs Historic District. ➢ Museum collections and records currently displayed and stored at the campus will need to be rehoused if the campus is vacated. ➢ City infrastructure may be impacted due to a change in rate of use and customer base. Possibility exists that the infrastructure is also historic. ➢ Potential for archaeological sites on Battle Mountain Campus, including a historic-era VA dump area. ➢ Battle Mountain and Waters (Fall River, and associated hot springs) as possible historic property concern related to Native American history. ➢ VA would no longer offer a Native American sweat lodge facility at the Battle Mountain Campus location. ➢ Consideration of cumulative effects per Section 106. ➢ Potential effect to the State Veterans Home due to changes in VA services in the area. ➢ Potential effect to the National Cemetery management, which currently relies on co-location with VA health services.

CBOC = Community Based Outpatient Clinic
MSOC = Multi Specialty Outpatient Clinic
RRTP = Residential Rehabilitation Treatment Program

APPENDIX C

NEPA/NHPA Substitution Process

NEPA / NHPA Substitution

36 CFR 800.8(c) *Use of the NEPA Process for Section 106 Purposes* Refer to the Checklist for Substitution (Attachment C to NEPA and NHPA *Handbook for Integrating NEPA and Section 106*) for process.	
800.8(c): Agency may use NEPA process and documentation to comply with Section 106 if SHPO and ACHP have been notified in advance.	• VA notified SHPO and ACHP by letter dated May 13, 2014, of intent to integrate Section 106 into the NEPA process following "substitution".
800.8(c)(1) *Standards for developing environmental documents to comply with Section 106*	
(i): Identify consulting parties through NEPA scoping process with results consistent with 800.3(f).	• Consulting parties include SHPO, Indian tribes, and representatives of local government. • Identified, invited, and accepted requests from others to be consulting parties. • Informed interested parties during scoping meetings to submit written requests to be considered a consulting party. • Continue to consider requests for consulting party status as 106 process moves forward.

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NEPA / NHPA Substitution

800.8(c)(1) ***Standards for developing environmental documents to comply with Section 106***	
(ii): Identify historic properties and assess effects of the undertaking consistent with 800.4 and 800.5	• **Determined area of potential effects with consulting parties.** • **Sought information about historic properties from public and consulting parties (including Native American tribes) during scoping; continue to seek information from consulting parties.** • **Identifying historic properties with consulting parties.** • **Identifying effects with consulting parties.** • **Applying criteria of adverse effect.**
(iii): Consult with consulting parties regarding the effects of the undertaking during scoping, environmental analysis, and preparation of EIS.	• **Presenting preliminary assessment of adverse effects to consulting parties.** • **Full analysis will be documented in Draft EIS.**

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NEPA / NHPA Substitution

800.8(c)(1) ***Standards for developing environmental documents to comply with Section 106***	
(iv): Involve the public in accordance with agency's published NEPA procedures.	• **Notice of Intent to prepare an EIS integrated with Section 106 was published in Federal Register on May 16, 2014.** • **News releases and public notices announced the public scoping period.** • **90-day public scoping comment period.** • **10 public scoping meetings throughout BHHCS service area.**
(v): In consultation with consulting parties, develop alternatives and proposed measures that might avoid, minimize, or mitigate adverse effects and describe them in the Draft EIS.	• **Identifying and discussing with consulting parties possible resolutions to avoid, minimize, or mitigate adverse effects.** • **Full consideration, descriptions, analysis, and resolutions will be documented in Draft EIS.**

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NEPA / NHPA Substitution

800.8(c)(2) *Review of environmental documents*	
(i): Submit Draft EIS to consulting parties when making the document available for public comment.	• **Notice of Availability, news releases, and public notices will announce the availability of the Draft EIS.** • **Consulting parties will be notified by email.** • **Minimum 45-day public comment period.**
(ii): Prior to or within Draft EIS public comment period, consulting parties may object to agency official that preparation of the Draft EIS has not met standards of (c)(1), or substantive resolution of effects proposed in Draft EIS is inadequate.	• **Follow Checklist for Substitution (Attachment C to NEPA and NHPA *Handbook for Integrating NEPA and Section 106*).** • **Comments on impact analysis and resolutions of adverse effects presented in Draft EIS will be discussed and consulted on with consulting parties.** • **Consideration of comments and additional analysis, as appropriate, will be presented in the Final EIS.**
800.8(c)(4) *Approval of the undertaking*	
(i): Binding commitment in EIS Record of Decision to proposed measures to resolve adverse effects.	• **Record of Decision will document measures to avoid, minimize, or mitigate adverse effects.**

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ATTACHMENT C
CHECKLIST FOR SUBSTITUTION

This checklist was developed by the Advisory Council on Historic Preservation (ACHP) as a guide for those preparing or reviewing a NEPA document – Environmental Impact Statement (EIS) or Environmental Assessment (EA) – used for Section 106 purposes in accordance with Section 800.8(c) of the Section 106 implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). The checklist is based on the standards for developing environmental documents to comply with Section 106 at 36 C.F.R. § 800.8(c)(1). Ideally, the preparer or reviewer will be able to answer "yes" to all items.

NOTIFICATION	YES	NO	COMMENTS
Did the agency notify *in advance* the SHPO/THPO and the ACHP of its intent to use the NEPA process for Section 106 purposes?			
Is the notification correspondence included in the EA/DEIS or appendices?			
IDENTIFICATION OF CONSULTING PARTIES	**YES**	**NO**	**COMMENTS**
Is the effort to identify consulting parties described in the EA/DEIS?			
Is a list of the consulting parties provided in the EA/DEIS?			
Are all consulting parties included? (Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties)			
Has the agency reviewed and responded to all requests to be consulting parties? Has the agency documented the exchange in its administrative record?			
IDENTIFICATION OF HISTORIC PROPERTIES	**YES**	**NO**	**COMMENTS**
Is the effort to identify historic properties of all types (buildings, structures, objects, districts, and sites) described, including the Area of Potential Effects and the methodology for investigation? If no, has the agency disclosed its intent to phase the identification and assessments?			
Is the effort to identify historic properties commensurate with the assessment of other environmental factors?			
Are determinations of eligibility for the National Register of Historic Places (NRHP) clearly stated?			
Can a layman understand the characteristics of each historic property and why it is significant (eligible for the NRHP) and retains integrity?			

ASSESSMENT OF EFFECTS	YES	NO	COMMENTS
Has one of the following Section 106 effect findings for the undertaking been clearly stated? ▸ No historic properties affected ▸ No historic properties adversely affected ▸ Historic properties adversely affected			
If adverse effects may result, is the application of the criteria of adverse effect described?			
Was all of the above information presented during scoping meetings and/or other public and stakeholder outreach?			
CONSULTATION AND PUBLIC INVOLVEMENT	**YES**	**NO**	**COMMENTS**
Is the SHPO/THPO concurrence with eligibility determinations documented? Is the documentation included in the document and appendices?			
Is the SHPO/THPO concurrence with the Section 106 effect finding documented? Is the correspondence included?			
Has an adequate opportunity for consulting with the SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties been provided prior to the release of the DEIS/EA? Is all relevant documentation (subject to confidentiality) included?			
Do any of the consulting parties substantively disagree with the agency's determinations of eligibility or findings of effect? If so; is the process for seeking agreement on those issues disclosed?			
If a National Historic Landmark (NHL) may be affected by the undertaking, has the agency notified the National Park Service (pursuant to 36 C.F.R. § 800.10(c)) and invited its participation where there may be an adverse effect? Is all relevant correspondence included?			
Does the document cover sheet or distribution letter clearly indicate that the DEIS/EA also documents the Section 106 process?			
Have historic preservation concerns expressed by members of the public been addressed? If appropriate, have such commenters been invited to be consulting parties in the Section 106 review?			
Have the scoping notices and other public meeting notices included information about Section 106?			

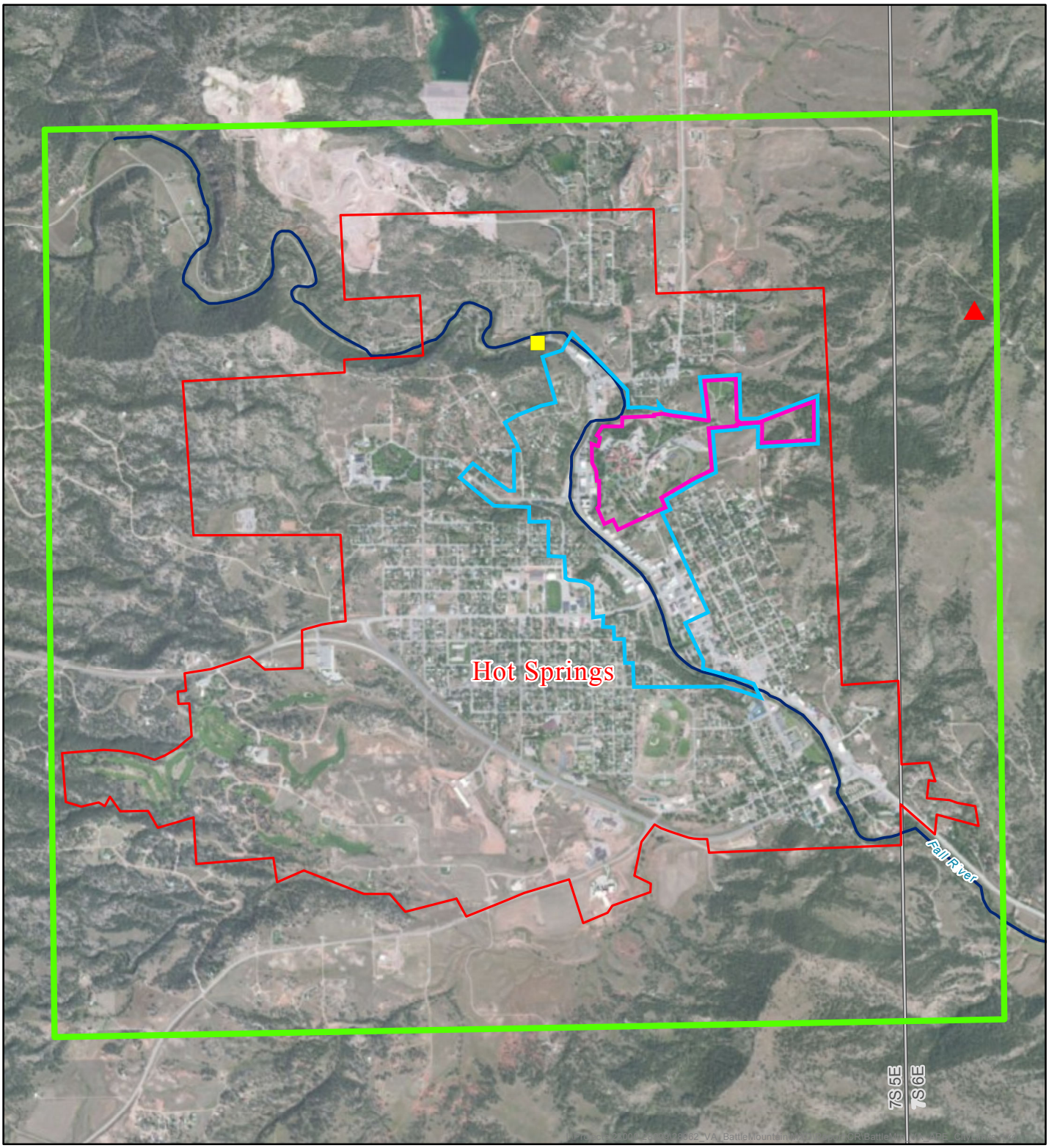
DEVELOPMENT OF ALTERNATIVES OR MEASURES TO AVOID, MINIMIZE, OR MITIGATE ADVERSE EFFECTS	YES	NO	COMMENTS
Is the development and evaluation of alternatives or modifications that could avoid or minimize adverse effects to historic properties documented?			
Where appropriate have mitigation measures been proposed?			
Is the consultation with SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties about avoidance, minimization, or mitigation measures documented? Is all relevant documentation (subject to confidentiality) included in the EA/DEIS or appendices?			
STEPS TO CONCLUSION	**YES**	**NO**	**COMMENTS**
Is there a potential for the preferred alternative to adversely affect at least one historic property? If no, Section 106 is complete if no objections are raised by the SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, other consulting parties, or the ACHP. Is the final Section 106 finding documented?			
If the preferred alternative could adversely affect historic properties, is one of the following strategies for completing the Section 106 process identified? ▸ Execution of a Memorandum of Agreement or a Programmatic Agreement ▸ Incorporation of the binding commitment to mitigation measures in the Record of Decision ▸ Termination, formal ACHP comments pursuant to 36 C.F.R. § 800.7, and response by head of the agency			

If incorporating binding commitment to mitigation measures in the ROD, does the ROD include the following:
▸ Commitments clearly identifying who will do what by when
▸ Administrative provisions including:
  ▸ Process for continued consultation during implementation (for example, regarding design review, data recovery, development of mitigation products)
  ▸ Deadlines/timelines for implementation
  ▸ Post-review discoveries
  ▸ Dispute resolution process
  ▸ Contingency for changes to the undertaking referencing 36 C.F.R. § 800.8(c)(5)			

IMPLEMENTATION	**YES**	**NO**	**COMMENTS**
Is the agency prepared to carry out the commitments made in: ▸ Memorandum of Agreement or a Programmatic Agreement, ▸ Record of Decision, or ▸ Response by head of the agency to formal ACHP comments following termination?			

APPENDIX D

Revised Areas of Potential Effects



BHHCS Proposed Reconfiguration
Legend

- Area of Potential Effects (APE)
- Battle Mountain (No Defined Boundary)
- Spring House
- Fall River
- Hot Springs City Limits
- Hot Springs Historic District
- VA Medical Center Campus Boundary
- Township/Range Boundary

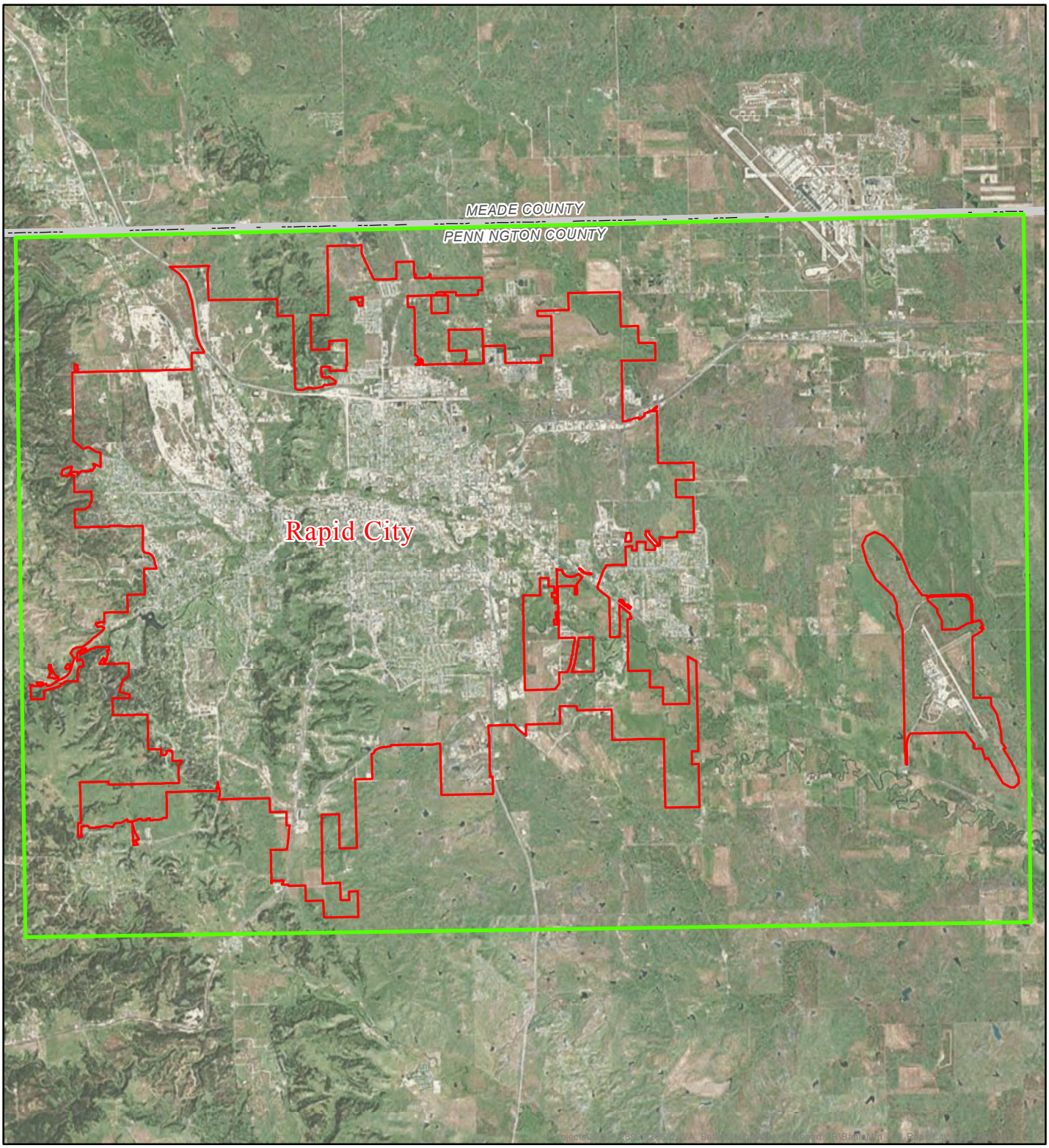
Miles: 0 0.25 0.5 1
Kilometers: 0 0.25 0.5 1

1:28,000

Base Map: World_Imagery, Esri Online Service
Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community
Township 7S Range 5E, T7S R6E
Fall River County, South Dakota

NAD 1983 UTM Zone 13N
3/3/2015

N



BHHCS Proposed Reconfiguration
Legend

- Area of Potential Effects (APE)
- County Boundary
- Rapid City Limits

Miles: 0 2 4 8
Kilometers: 0 2 4 8

1:130,000

Base Map: World_Imagery, Esri Online Service
Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community
Meade County and Pennington County, South Dakota

NAD 1983 UTM Zone 13N
3/3/2015

N

MEETING / TELECONFERENCE NOTES

Subject: Proposed Reconfiguration of the Black Hills Health Care System; Section 106 Consultation
Date: April 27, 2015
Time: 9:00 a.m. – 1:00 p.m. MDT
Participants: VA BHHCS, Labat Environmental, SWCA Consultants, Consulting Parties (see list)
Attachments: Teleconference Agenda, Potential Effects Tables
Recorded by: Zonna Barnes, SWCA

The agenda for the teleconference focused on seeking input from consulting parties on the review of potential effects to the historic properties under the criteria of adverse effects, and a discussion of preliminary considerations for avoiding, minimizing, and mitigating adverse effects for each of the proposed alternatives.

Due to similar components of the alternatives, many of the potential effects are similar across the alternatives. Therefore, the intent of the teleconference was to continue the framework of previous consultation by focusing on effects and resolutions as relating to off-campus and on-campus actions. Overall, concerns for resources and effects identified during the previous Section 106 workshops (November 2014 and February 2015) were reviewed in relation to the examples of adverse effects listed in the Section 106 regulations. Analysis of effects is on-going and will be finalized during the EIS preparation.

All alternatives considered would affect cultural resources and historic properties. Adverse effects would be avoided, minimized, and mitigated by VA following existing federal regulations, directives, policies, standards, or guidelines. Planning for and commitment to implementation of specific practices would be addressed in the Record of Decision (ROD) for any alternative selected. Proposed resolutions for addressing the potential adverse effects were presented in a broad framework tied to the criteria of adverse effects for consulting party review and comment.

Consulting party input resulted in the following additions to the treatment/resolution approach presented:

- Complete ethnographic research.
- Implement a monitoring and reporting system to ensure all measures outlined in the treatment approach are completed.
- Develope a Historic Property Preservation Plan that outlines the proper preservation protocol for the facility.
- Ensure that properly trained/qualified historic preservation staff is assigned to oversee the facility and ensure the standards and measures outlined in the treatment approach are followed.
- Outline the third-party disposal process for the facility.
- Outline the process for transferring the property including request for proposals.

All input from consulting party attendees will be considered during analysis and preparation of the Draft EIS. Additional consultation meetings are planned after the Draft EIS is released for review and comment.

Consulting Party	Participated in Teleconference
Advisory Council for Historic Preservation	Yes
AFGE Hot Springs Local	Yes
American Legion	Yes
City of Hot Springs	Yes
Department of the Interior: National Park Service	Yes
Fall River County Commission Office	No
Fall River County Historical Society	No
Fort Peck Tribes of Assiniboine and Sioux	No
Hot Springs Certified Local Government – Historic Preservation Commission	Yes
Individual Veteran	Yes
Kiowa Tribe of Oklahoma	No
National Trust for Historic Preservation	Yes
Northern Arapaho Tribe	No
Oglala Sioux Tribe of the Pine Ridge Reservation	No
Save the VA	Yes
South Dakota State Historic Preservation Office	Yes
Yankton Sioux Tribe	No

April 27, 2015

RECONFIGURATION OF BLACK HILLS HEALTH CARE SYSTEM

National Historic Preservation Act, Section 106
Consulting Parties Workshop

Agenda:

9:00am– 1:00pm

1. Welcome and introductions
2. Instructions for participating via teleconference
3. Approach for identifying effects and resolutions
4. Review of effects and adverse effects criteria
5. Review guidance/policy for resolving adverse effects
6. Discussion of potential resolutions

ON CAMPUS ACTIONS / EFFECTS				
RENOVATION: Alternatives C, E, G (continued VA occupancy or reuse by others) **VA RELOCATION: Alternatives A, B, D (available for reuse by others)**				
Potential Actions That May Cause Effects	**Potential Effects**	**Direct (Physical)**	**Indirect (Setting)**	**Examples of Adverse Effects**
Consideration of cumulative effects per Section 106.	Cumulative effects	X	X	1 through 7
Building exteriors may be potentially altered for rehabilitation or reuse.	Alteration of historic property	X	X	1, 2, 4, 5
Upgrades and renovations may occur.				
Renovations to continue use of the property.				
[Renovation-specific] Restore/renew health care and other services to the campus ("Save the VA" Alternative) ensuring continued use of all the historic buildings.				
Alterations to building exteriors and interiors for disabled access, including ramps and sidewalk upgrades.				
Possible archaeological sites on Hot Springs campus where new construction could occur.	Ground disturbance from construction	X		1
[Reuse-specific] Change of use if the campus is no longer used as a medical facility.	Change in use and potential alteration of historic property	X	X	1, 2, 4
Change in use of some of the buildings.				
Location of new construction on the Hot Springs campus may impact the National Historic Landmark, including viewshed, traffic, and other concerns.	Alteration of setting of historic property		X	4, 5
Vacate parts of buildings or entire buildings on the campus.	Change in use and potential deterioration of the historic property	X	X	4, 6, 7

WORKING DRAFT – DO NOT CITE 1

ON CAMPUS ACTIONS / EFFECTS				
RENOVATION: Alternatives C, E, G (continued VA occupancy or reuse by others) **VA RELOCATION: Alternatives A, B, D (available for reuse by others)**				
Potential Actions That May Cause Effects	**Potential Effects**	**Direct (Physical)**	**Indirect (Setting)**	**Examples of Adverse Effects**
[Reuse-specific] Re-Use Options. Future management of the property—VA's Property Disposition Process [to be initiated if an alternative is selected that relocates services and vacates the Hot Springs campus].	Deterioration or potential alteration of historic property or change in historic use	X	X	4, 6, 7
Battle Mountain and waters (Fall River and associated hot springs) as possible historic property concern related to Native American history.	Alteration of setting or use of historic properties		X	5
Changes to the State Veterans Home due to changes in VA services in the area.				
Potential degradation of the National Historic Landmark and the Hot Springs Historic District.	Deterioration or alteration of historic property	X	X	2, 6
Buildings continue to be maintained while occupied by VA.	Potential for alteration of historic property	X	X	2
Continued VA ownership and use maintains compliance with historic preservation laws.	Potential for alteration of historic property	X	X	2
Museum collections and records currently stored at the campus would need to be relocated if the campus is vacated.	Not historic properties, but important to VA's heritage			N/A
Water rights retained by the VA	Change in use and potential alteration of historic property	X		4

WORKING DRAFT – DO NOT CITE 2

ON CAMPUS ACTIONS / EFFECTS				
RENOVATION: Alternatives C, E, G (continued VA occupancy or reuse by others) **VA RELOCATION: Alternatives A, B, D (available for reuse by others)**				
Potential Actions That May Cause Effects	**Potential Effects**	**Direct (Physical)**	**Indirect (Setting)**	**Examples of Adverse Effects**
Removing VA from the property and the impacts to Hot Springs as the "Veterans Town."	Alteration of setting or use of historic properties		X	4
Changes to National Cemetery Administration management, which is currently co-located with VA health services at the Hot Springs campus.	Alteration of setting or use of historic properties	X	X	4
Potential degradation of the National Historic Landmark and the Hot Springs Historic District.	Deterioration or alteration of historic property	X	X	4, 6, 7
Potential for maintenance neglect.				
Vacant buildings; damage during mothballing.				
City infrastructure (if determined historic) may be impacted due to a decline in rate of use and customer base.				
*Any alterations to the NHL that do not comply with the Secretary of the Interior's Standards (Secretary's Standards) for the Treatment of Historic Properties.	Alteration of historic property	X		2
*Alterations of historic window and door openings.	Alteration of historic property	X		1, 2, 4
*Potential for unmarked burials at new construction areas on campus. (Anywhere archaeological sites are a concern, as in the Black Hills, burial discovery while less frequent is of great concern when it arises.)	Ground disturbance from construction and effect to setting and feeling	X		1

WORKING DRAFT – DO NOT CITE 3

ON CAMPUS ACTIONS / EFFECTS				
RENOVATION: Alternatives C, E, G (continued VA occupancy or reuse by others) **VA RELOCATION: Alternatives A, B, D (available for reuse by others)**				
Potential Actions That May Cause Effects	**Potential Effects**	**Direct (Physical)**	**Indirect (Setting)**	**Examples of Adverse Effects**
*Any archaeological or burial site could also be a site of Native American traditional concern. These could be found to be a feature or component of sacred site use in the Black Hills, such as the Hot Springs traditional use area.	Ground disturbance from construction	X		1, 2
*Painting natural stone or brick exteriors at the NHL. While renovation may cause structural alterations to NHL buildings, painting of natural exteriors may have a greater affect to appearance and setting, including the surrounding Historic District which also has native sandstone, than some ground level modifications such as ADA access ramps.	Alteration of historic property	X		2, 4, 5

*SWCA addition

OFF CAMPUS ACTIONS / EFFECTS				
HOT SPRINGS: Alternatives A, B, D (new construction off campus) **RAPID CITY: Alternatives A, B, C, D (new construction off campus)**				
Potential Actions That May Cause Effects	**Effect**	**Direct (Physical)**	**Indirect (Setting)**	**Criteria of Adverse Effect**
Consideration of cumulative effects per Section 106.	Cumulative effects	X	X	1 through 7
Change in local government tax-base. [to be determined from socioeconomic analysis]	Cumulative effect		X	2, 4, 5
Native American access to the sweat lodge on the VA campus may be limited.	Alteration of setting or use	X		Under other authorities
Potential for archaeological sites at new locations.	Ground disturbance from construction	X		1
The new location may impact the Hot Springs Historic District, including viewshed, traffic, and other concerns.	Alteration of setting of historic property		X	4, 5
Potential effects (setting) to the State Veterans Home due to changes in VA services (new development) in the area.	Cumulative effect of altering the setting of the historic property	X	X	4, 5, 6
Battle Mountain and waters (Fall River and associated hot springs) as possible historic property concern related to Native American history.	Alteration of setting or use of historic properties		X	5
*Potential for unmarked burials at new construction site. Burials on non-federal land, if VA leases rather than purchases a new development site. Burials on non-federal or tribally held lands are not afforded protection under NAGPRA; however, the State of South Dakota burial protection law and Section 106 would still federally apply.	Ground disturbance from construction	X		1

WORKING DRAFT – DO NOT CITE 5

Examples of Adverse Effects

1. Physical destruction of or damage to all or part of the property;
2. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;
3. Removal of the property from its historic location;
4. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
5. Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
6. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe; and
7. Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

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Appendix D
Summary of Public Scoping

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DEPARTMENT OF VETERANS AFFAIRS

PROPOSED RECONFIGURATION OF BLACK HILLS HEALTH CARE SYSTEM

ENVIRONMENTAL IMPACT STATEMENT

SUMMARY OF PUBLIC SCOPING

JUNE 2014

ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
ADA	Americans with Disabilities Act
BHHCS	Black Hills Health Care System
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EIS	Environmental Impact Statement
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NOI	Notice of Intent
Project	Proposed Reconfiguration of the VA Black Hills Health Care System
SHPO	State Historic Preservation Office(r)
VA	Department of Veterans Affairs
U.S.	United States
U.S.C.	United States Code

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1.0 INTRODUCTION

The United States (U.S.) Department of Veterans Affairs (VA) proposes to reconfigure health care services in Hot Springs and Rapid City, South Dakota, to expand points of access to health care within the VA Black Hills Health Care System (BHHCS) service area. The purpose for the reconfiguration is to better serve the health care needs and distribution of Veterans over the next 20 to 30 years. Alternate ways to implement the reconfiguration could include construction of new facilities, modifications to existing facilities, and additional options to receive health care services provided by non-VA facilities.

The reconfiguration proposal (Project) is a federal action subject to Section 102 of the National Environmental Policy Act (NEPA) (42 United States Code [U.S.C.] 4321 et seq.). VA is preparing an Environmental Impact Statement (EIS) on this Project in accordance with NEPA, Council on Environmental Quality (CEQ) "Regulations Implementing the Procedural Provisions of NEPA" (40 Code of Federal Regulations [CFR] 1500-1508), VA NEPA regulations "Environmental Effects of the Department of Veterans Affairs Actions" (38 CFR Part 26), and VA guidance "NEPA Interim Guidance for Projects" (September 2010).

The Project is also a federal undertaking subject to Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C 470f) and Advisory Council on Historic Preservation (ACHP) regulations implementing Section 106 (36 CFR 800). VA has chosen to integrate Section 106 consultation and compliance within the overall NEPA framework, following the substitution process of 36 CFR 800.8(c).

This summary documents the results of the public scoping process for the EIS for the Project.

2.0 SCOPING PROCESS

"Scoping" is the term used in the CEQ regulations implementing NEPA to define the process for determining the scope of issues to address during the environmental analysis of a proposed action or project. Scoping provides an avenue to involve the public with identifying potentially significant issues and concerns of public importance related to a project, and possible alternatives to that project. Scoping also helps identify any issues that are not significant or not related to a project, or alternatives that are not feasible, and thereby eliminating these issues or alternatives from detailed analysis.

The scoping process for the Project involved the activities described in the following sections.

2.1 Notice of Intent

The Notice of Intent (NOI) is the legal forum notifying the public of the federal agency's intent to prepare an EIS for a major federal action. The NOI invites the participation of affected and interested agencies, organizations, elected officials, Veterans, and members of the public (all commonly referred to as "stakeholders") in determining the scope and significant issues to be

addressed and analyzed in the EIS. The NOI to prepare an EIS for VA's proposal to reconfigure health care services within the VA BHHCS service area was published in the Federal Register (Vol. 79, No. 95) on May 16, 2014. The close of the scoping period was 30 days later on June 16, 2014; however, VA chose to extend the scoping period an additional 60 days to August 16, 2014, in response to public request and the unavailability of the *regulations.gov* website for submitting public comments. The second NOI extending the comment period was published in the Federal Register (Vol. 79, No. 114) on June 13, 2014. The NOIs are included in Appendix A.

2.2 Scoping Notice

A scoping notice announcing the Project and the schedule for public scoping meetings was published in newspapers covering communities in the VA BHHCS service area in South Dakota, Nebraska, and Wyoming. The newspapers are listed in Table 2-1. A second notice was published announcing additional public scoping meetings and the extended public comment period. The locations of the additional meetings listed in the notice varied by the circulation area of the newspaper, with the Rapid City Journal publication including all meeting locations. The number of days the notice was published was based on whether the newspaper was a daily or weekly publication. The two scoping notices were paid publications and appeared in the public notice or legal section of the newspapers. The notices and the newspaper affidavits of publication are included in Appendix B.

Table 2-1. Newspaper Publications of Scoping Notice

Newspaper	Publication Dates[1]	Newspaper	Publication Dates[1]
Rapid City Journal (SD)	May 23, 24, 28 June 15	Hot Springs Star (SD)	May 27 June 17
Black Hills Pioneer (SD)	May 23, 24, 27	Meade County Times (SD)	June 4
Capital Journal (SD)	May 23, 27, 28 June 16, 17, 18	Native Sun News (SD)	May 28 June 19
Custer County Chronicle (SD)	May 28	West River Eagle (SD)	June 19
Lakota Country Times (SD)	May 28 June 19	Chadron Record (NE)	May 28 June 18
Alliance Times-Herald (NE)	May 22, 23, 24 June 13, 14, 16	Scottsbluff Star Herald (NE)	May 23, 24, 25 June 13, 14, 16
Gering Courier (NE)	May 29 June 19	Newcastle News Letter Journal (WY)	May 29 June 19
Weston County Gazette (WY)	May 29		
[1] All publication dates were 2014			

2.3 News Release

VA BHHCS prepared a news release dated May 19, 2014, announcing the publication of the NOI in the Federal Register and the start of the public scoping and comment period. A second news release dated May 21, 2014, announced the schedule and locations for public scoping meetings, and a third

news release dated June 10, 2014, announced the extension of the public comment period and the schedule and locations of additional public scoping meetings. The three news releases included the methods for submitting public comments. The Public Affairs Office distributed the news releases to the broadcast and print media outlets throughout the VA BHHCS service area listed in Table 2-2. The news releases are included in Appendix C.

Table 2-2. Media Outlets

Newspaper	Radio
Rapid City Journal Hot Springs Star Edgemont Herald Tribune Native Sun News Custer Chronicle Winner Advocate Meade County Times-Tribune Pierre Capital Journal Black Hills Pioneer Butte County Post Lakota Country Times Hill City Prevailer Gregory News New Underwood Post Faith Independent Scottsbluff Star Herald Lemmon Leader West River Eagle Kadoka Press Corson/Sioux County News Messenger Bennett County Booster Todd County Tribune Isabel Dakotan	KDSJ – Deadwood KBHB – Sturgis KFXS – Rapid City KLMP – Rapid City KTPT – Rapid City KOTA – Rapid City KJBI – Fort Pierre KGFX – Pierre KCCR – Pierre KLXS – Pierre KPLO – Reliance KMLO – Lawry KOLY – Mobridge KABD – Aberdeen KBHU – Black Hills State University KCMI – Scottsbluff SDPB – South Dakota Public Broadcasting American Ag Network
Television	**Other**
KEVN/Fox – Rapid City KOTA/ABC – Rapid City KNBN/NBC – Rapid City KELO/CBS – Sioux Falls OAHE TV – Pierre SDPB – South Dakota Public Broadcasting	Associated Press SD Department of Veterans Affairs Newsletter VFW Newsletter American Legion Newsletter Meade County Town Hall (Facebook) Freelance Writers

2.4 Website

VA BHHCS Public Affairs Office maintains a webpage (www.blackhills.va.gov/vablackhillsfuture) to keep the public informed about the Project. Scoping information that has been posted to the webpage includes the NOI, scoping notices, news releases, and materials presented during the public scoping meetings.

2.5 Scoping Meetings

VA BHHCS hosted 10 scoping meetings in 9 different communities throughout the service area. The scoping meetings offered the public an opportunity to learn about and provide comments on the Project. The dates, locations, and estimated attendance of those meetings are listed in Table 2-3.

Table 2-3. Public Scoping Meetings

Location	Date[1]	Attendance[2]
Hot Springs, SD	June 11 (afternoon)	105
	June 11 (evening)	115
Rapid City, SD	June 12	35
Pine Ridge, SD	June 24	25
Chadron, NE	June 24	91
Alliance, NE	June 25	51
Gering/Scottsbluff, NE	June 25	53
Mission, SD	June 26	3
Pierre, SD	June 26	20
Newcastle, WY	June 27	5
[1] All meeting dates were 2014	[2] Estimated	

Scoping meeting attendees were invited to add their name to a mailing list and to view display boards prior to the start of each meeting. The display boards included information on NEPA and the scoping process, integrating the NHPA into the NEPA process, purpose and need for the Project, alternatives for implementing the Project, and the environmental resources to be analyzed in the EIS. The attendees were also provided two handouts – an information sheet on the Project and NEPA process, and a comment form.

Each meeting started with a PowerPoint® presentation explaining the purpose of public scoping, the NEPA process, and the public's role in contributing to the NEPA process. The purpose and need for the Project, alternatives for implementing the Project, and the integration of the NHPA process with the EIS were presented. Upon completion of the presentation, the attendees were invited to provide verbal comments. The presentation and verbal comments at each meeting were transcribed by a registered professional court reporter.

The display boards, handouts, and presentation are included in Appendix D.

2.6 Identify Consulting Parties

As defined by the Section 106 implementing regulation 36 CFR 800.2(c), consulting parties include the State Historic Preservation Officer (SHPO); Indian tribes; representatives of local governments; and individuals and organizations with a demonstrated interest in the undertaking due to the nature

of their legal or economic relation to the undertaking or affected historic properties, or their concern with the undertaking's effects on historic properties.

VA BHHCS identified consulting parties from numerous stakeholders who were notified by letter dated May 13, 2014, of the intent to prepare an EIS that integrates the Section 106 consultation requirements of the NHPA within the framework of the NEPA process. Attendees at the public scoping meetings were invited to submit written requests to VA BHHCS to be considered as a consulting party. By letter dated October 20, 2014, the stakeholders were notified of the preliminary list of identified consulting parties. Table 2-4 lists the consulting parties identified as of October 20, 2014. Additional consulting parties may be identified as the integrated NEPA and Section 106 process continues. Letters pertaining to identifying consulting parties are included in Appendix E.

Table 2-4. Identified Consulting Parties

Consulting Party[1]
Advisory Council for Historic Preservation
City of Hot Springs
Department of the Interior: National Park Service
Fall River County Commission Office
Fall River County Historical Society
Fort Peck Tribes of Assiniboine and Sioux
Hot Springs Certified Local Government–Historic Preservation Commission
Kiowa Tribe of Oklahoma
National Trust for Historic Preservation
Northern Arapaho Tribe
Oglala Sioux Tribe of the Pine Ridge Reservation
Save the VA
South Dakota State Historic Preservation Office
Yankton Sioux Tribe
[1] Includes all consulting parties identified as of October 20, 2014

3.0 SCOPING SUMMARY

The scoping period was open for 90 days from May 16 through August 16, 2014. The scoping process provided sufficient opportunity for the public to express their comments and provide meaningful input to the integrated NEPA/NHPA process for the Project. VA BHHCS provided adequate notice of the public scoping meetings and offered different methods for the public to provide their input. Verbal and written comments were received at the scoping meetings, and written comments were also received via:

1. email to vablackhillsfuture@va.gov
2. online at www.regulations.gov, Docket VA-2014-VACO-0001 and -0002

3. online at www.blackhillseis.com (EIS contractor website)
4. mail to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Road, Fort Meade, SD 57741

Comments were received from Veterans, individuals, organizations, businesses, and agencies. There were 386 written comments received, 159 verbal comments made during the scoping meetings, and a form letter submitted by 138 individuals. Excerpts from the written comments and the scoping meeting transcripts are available upon request for public review during regular business hours at the Public Affairs Office in Building 116 at the VA BHHCS Fort Meade location and the Administration Office in Building 1 on the VA Hot Springs campus.

3.1 Comment Categories

The written comments and scoping meeting transcripts were read to identify substantive issues and to define issues and comments by the categories listed in Table 3-1. These categories generally represent the content of the EIS, and are used to verify that the comments and issues identified during the scoping process are appropriately addressed in the EIS or during the completion of the NEPA process. The categories applicable to or mentioned in the comments that were received are indicated in the table by a checkmark (✓). Some comments were applicable to more than one category.

Table 3-1. Comment Categories

Category		Category	
Purpose and Need	✓	Geology and Soils	
Alternatives	✓	Hydrology and Water Quality	✓
Aesthetics	✓	Land Use	✓
Air Quality	✓	Noise	
Community Services	✓	Socioeconomics	✓
Cultural Resources / Historic Properties	✓	Solid and Hazardous Materials	✓
Cumulative Impacts	✓	Transportation and Parking	✓
Environmental Justice	✓	Utilities	✓
Floodplains and Wetlands		Wildlife and Habitat	
NEPA Process	✓	NEPA / NHPA Integration	✓
Outside Scope of NEPA and EIS	✓		
✓ Category applicable to or mentioned in a comment			

3.2 Summary of Comments

Scoping is not a vote-counting process; the emphasis is on content of the comments rather than the number of times a particular comment was stated. All comments are given equal weight regardless of whether they were mentioned once or mentioned several times.

The comments are summarized in this section by the assigned categories and are repeated when applicable to more than one category. Repeated comments are shown in *italics*. The comments in each category are not listed in any priority but are only numbered for convenience for the reader.

3.2.1 Purpose and Need

1. *Quality of and access to health care for Veterans should be the major considerations.*
2. *Factual basis of and discrepancies with data used for purpose and need.*
3. Travel distance to receive health care may discourage (or encourage) Veterans from seeking care, or make it more (or less) difficult to access care (depends on location of Veteran in relation to location of VA health service provider).
4. Travel distance affects both reimbursable and non-reimbursable travel expenses.
5. *Expand Tele-Med services to reduce time and expense for traveling to receive care.*
6. *Provide more doctors and nurses to expand and continue health care services in Hot Springs.*
7. Provide more funding to hire more staff; pay higher salaries.
8. *Lengthy time period for making a decision on the reconfiguration proposal causes uncertainty for VA employees (current and future).*
9. VA's recruitment, hiring, and retention practices contribute to loss and lack of qualified staff; part-time versus full-time positions.
10. *Modern and new medical facilities would attract and retain more qualified staff.*
11. Provide access to local, private health care services (non-VA care) purchased by VA.
12. Increased use of non-VA care from local providers who may already be operating at capacity.
13. *Increased occupancy at State Veterans Home would increase demand for in-patient services at VA Hot Springs hospital.*
14. *More employment, housing, and education opportunities for Veterans in urban settings.*
15. Larger network of community partners to support Veterans in urban settings.
16. *Cost comparison to build new facilities or renovate existing facilities.*
17. *Provide Veterans in work therapy and rehabilitation treatment programs with training to maintain and preserve historic buildings.*
18. Reconfiguration purpose should benefit Veterans, not maintain facilities for the benefit of the community.
19. Funding police, fire, and maintenance staff to continue acute care/inpatient services at VA Hot Springs is not good stewardship of public money.
20. State-of-the-art health care facilities to provide quality, safe care should be located where most Veterans live.
21. Slopes of interior ramps in domiciliary building do not comply with building codes or accessibility standards.
22. *Historic buildings can be renovated to comply with requirements of the Americans with Disability Act (ADA).*
23. Renovations of historic buildings for ADA compliance and modern uses would (or would not) be costly.

24. Rephrase purpose statement to address issues associated with ADA compliance instead of assuming non-compliant buildings have to be replaced, which essentially forecloses rehabilitation/renovation as an alternative.
25. Medical accreditation inspections indicate VA Hot Springs provides safe, quality health care.
26. Maintaining 100+ old buildings for medical facilities is unacceptable for any Veteran.

3.2.2 Alternatives

1. *Quality of and access to health care for Veterans should be the major considerations.*
2. *Factual basis of and discrepancies with data used to develop alternatives.*
3. List which health care services would be provided by each alternative.
4. Consider an alternative that restores the health care services previously offered at the VA Hot Springs campus.
5. Consider an alternative that expands and enhances VA health care and work therapy services at the VA Hot Springs campus (Alternative E–Save the VA).
6. *Provide Veterans in work therapy and rehabilitation treatment programs with training to maintain and preserve historic buildings.*
7. Consider an alternative that includes some (or excludes some) components from the other alternatives.
8. Consider an alternative that incorporates a teaching hospital associated with VA Hot Springs for rural health care providers and students in training.
9. Consider an alternative that includes opening VA community-based outpatient clinics in other communities.
10. Consider an alternative that closes the VA Fort Meade facilities and transfer services to VA Hot Springs.
11. Consider an alternative that closes the VA hospitals in Hot Springs and Fort Meade and that consolidates services in Rapid City.
12. *Modern and new medical facilities would attract and retain more qualified staff.*
13. *Expand Tele-Med services to reduce time and expense for traveling to receive care.*
14. *Provide more doctors and nurses to expand and continue health care services in Hot Springs.*
15. Establish partnerships with local health care service providers for Veterans care.
16. Increase access to and capacity of RRTP services, including for single-parent and handicapped Veterans.
17. Renovate housing rented to VA staff on VA Hot Springs campus to increase capacity for single-parent and handicapped Veterans in treatment programs.
18. Co-locate primary and specialty care with RRTP.
19. Allow Veterans to use available domiciliary space as overnight accommodations when traveling to receive care.
20. *Increased occupancy at State Veterans Home would increase demand for in-patient services at VA Hot Springs hospital.*
21. *Cost comparison to build new facilities or renovate existing facilities.*

22. *VA Directive 0066 instructs the agency to give priority to locations in "rural town centers to strengthen the vitality and livability of the communities in which federal facilities are located."*
23. Use the buildings on the VA Hot Springs campus as a museum or to house homeless Veterans if VA relocates health care services.
24. The No Action Alternative does not represent an objective baseline but partial implementation of the reconfiguration proposal; the alternative should represent a fully functioning facility.
25. VA has not responded to the Save the VA organization's proposed alternative.
26. Establish a Veterans National Recovery Center at VA Hot Springs campus through an enhanced-use lease.
27. *Incorporation of comments from initial town hall meetings from 2011 into developing alternatives.*
28. *List of alternatives is biased, incomplete, and not responsive to public comments.*
29. *Majority of Veterans and the public do not want the VA Hot Springs campus closed.*

3.2.3 Aesthetics

1. The architecture of the buildings and setting of the VA Hot Springs campus are beautiful.
2. *Façade of historic buildings on NHL add to the visual appearance and ambience of the City of Hot Springs.*

3.2.4 Air Quality

1. Longer travel distances to receive care increases gas consumption and vehicle emissions that affect air quality.

3.2.5 Community Services

Community services are provided for the benefit of the public and generally include law enforcement, fire protection, emergency response, education, medical services, and parks and recreation.

1. Qualifications and capacity of Fall River Hospital to provide health care services to Veterans and State Veterans Home residents.
2. Qualifications and capacity of private health care providers to provide health care services to Veterans.
3. Continued collaboration between State Veterans Home and VA BHHCS to provide health care services.
4. Operational status of State Veterans Home should VA Hot Springs change services or close.
5. Access to dialysis services should VA Hot Springs change services or close.
6. Loss of VA fire department services that support Hot Springs and rural volunteer fire departments.
7. Loss of VA fire department would change protection class rating and increase homeowners insurance.
8. Decline in population could decrease the pool of volunteers for firefighters, emergency personnel, and other community services and activities.

9. Less employment opportunities, loss of jobs, and vacant homes and businesses in Hot Springs could increase crime, which burdens law enforcement services.
10. Decrease in school enrollment in Hot Springs because of loss of jobs and relocations.
11. Decrease in school enrollment in Hot Springs would affect school funding.
12. Decrease in school enrollment in Hot Springs would affect the number of teaching positions.
13. Funding affects school quality and offered programs, and ability to attract teachers and families with school-aged children.
14. Revenue from sales taxes and property taxes to maintain community services would change.
15. *Renewed interest in community improvements and new business ventures in Hot Springs with reuse of VA campus.*

3.2.6 Cultural Resources / Historic Properties

1. Requirement to maintain VA Hot Springs campus because of its National Historic Landmark (NHL) status.
2. Identify agency responsible for maintenance of NHL.
3. Importance of NHL designation in addition to National Register of Historic Places listing.
4. Financial cost to VA to maintain the historic condition of the NHL buildings if the VA Hot Springs campus is vacated.
5. *Incorporation of and compliance with relevant federal historic preservation laws and executive orders during the planning process for the undertaking.*
6. VA compliance with its Cultural Resources Management Procedures, Handbook 7545.
7. Maximize the reuse of existing historic properties in accordance with VA's Sustainable Locations Program.
8. NHL status requires VA minimize harm to the landmark to the maximum extent practicable.
9. Facilitate continued or compatible new uses of the NHL through VA's Enhanced-use Lease authority and the Building Utilization Review and Repurposing Initiative to address Veterans homelessness.
10. Historic and traditional views of healing powers of thermal springs in the Hot Springs area.
11. *Access to sweat lodge on VA Hot Springs campus for use by Native Americans.*
12. *Changes to City of Hot Springs revenues, employment, and businesses could affect Historic District.*
13. Deterioration, disrepair, and demolition of historic buildings should VA vacate the Hot Springs campus.
14. NHL listed as an endangered historic place by National Trust for Historic Preservation.
15. Relocating health care services from the NHL would change the historic use of the buildings and NHL.
16. Historic architectural assessment indicates historic buildings on NHL are in good condition and can be renovated for modern needs.
17. *Historic buildings can be renovated to comply with requirements of the ADA.*
18. *Façade of historic buildings on NHL add to the visual appearance and ambience of the City of Hot Springs.*

19. Donate (move) the unused greenhouse (conservatory) located on Hot Springs VA campus to State Veterans Home.
20. NEPA and historic preservation laws require the historic buildings remain occupied to prevent deterioration.
21. *Provide Veterans in work therapy and rehabilitation treatment programs with training to maintain and preserve historic buildings.*
22. Continued funding and maintenance of the National Cemetery should VA vacate its Hot Springs campus.

3.2.7 Cumulative Impacts

1. National Guard using Fort Meade campus as a training complex should a multi-specialty outpatient clinic in Rapid City result in the future closure of VA facilities at Fort Meade.
2. Address VA's actions for the BHHCS since 1995.
3. Consider cumulative impacts of past VA actions of closing parts of the NHL.
4. Consider adverse cumulative impacts of all alternatives.

3.2.8 Environmental Justice

1. Effect of closing Hot Springs VA on the availability of health care services for Native American Veterans.
2. Travel distance and availability of transportation for Native American Veterans to receive services at VA Hot Springs or at other locations should VA Hot Springs close.
3. *Access to sweat lodge on VA Hot Springs campus for use by Native Americans.*

3.2.9 Hydrology and Water Quality

1. Construction of new and larger facilities increases storm water runoff into creeks and ponds.

3.2.10 Land Use

1. Address applicability of 1868 Fort Laramie Treaty to future use of Hot Springs VA campus.
2. Available land on VA Hot Springs campus can accommodate construction of new buildings instead of acquiring land elsewhere.

3.2.11 Socioeconomics

Socioeconomics focuses on economic activity based on population, employment, income, tax revenue, and housing.

1. As Hot Springs' largest employer, closing the VA campus would decrease employment opportunities.
2. Less employment opportunities and loss of jobs in Hot Springs would result in relocations and a declining population.
3. Less employment opportunities and loss of jobs in Hot Springs would increase dependence on government assistance programs.

4. Enhancing VA services would also enhance rural economic development (Alternative E–Save the VA).
5. *More employment opportunities for Veterans in urban settings.*
6. Time and cost for VA Hot Springs employees to commute to work at other VA locations.
7. Reduction in Veteran's work days and salary to travel for health care.
8. Veterans would not relocate to or would relocate from Hot Springs because of no access to health care services.
9. Relocations and a declining population in Hot Springs would affect the real estate market (home prices, days on market, inventory).
10. Loss of equity on home sales affects income.
11. Declining population in Hot Springs would deter establishment of new businesses.
12. Closing the VA Hot Springs campus would result in an estimated loss of $21 million in annual revenue for the City of Hot Springs and Fall River County.
13. Decrease in annual revenue attributed to VA operations could increase property taxes in Hot Springs and Fall River County.
14. Property tax increases would increase rental costs and vacancies in Hot Springs and Fall River County.
15. Changes to City of Hot Springs revenues and employment could affect property values.
16. *Changes to City of Hot Springs revenues, employment, and businesses could affect Historic District.*
17. Loss of Veterans and VA employees in Hot Springs would decrease customer base and revenue for local businesses, which could cause some businesses to close or decrease resale value.
18. Loss of a customer based for local businesses would decrease sales tax revenue for the City of Hot Springs and Fall River County.
19. Loss of local businesses would cause residents to travel further for goods and services.
20. Closed businesses and closure of VA campus would deter tourists from stopping in Hot Springs.
21. Length of time for economy of City of Hot Springs to recover without VA operations.
22. *Renewed interest in community improvements and new business ventures in Hot Springs with reuse of VA campus.*
23. Presence of VA fire department in Hot Springs affects protection class rating for homeowners insurance.
24. Insurance on vacant homes and businesses is more expensive and difficult to obtain.
25. Change to median income with loss of higher-paying VA jobs in Hot Springs.
26. Purchase of non-VA care from local provider would aid financial stability of provider, which in turn benefits all users.
27. The rates paid for non-VA care would be insufficient for the local provider to recoup the costs of the care.
28. Individual Veteran's financial hardship from delay in receiving reimbursement from VA for payment for services by a private medical care provider.

29. *VA Directive 0066 instructs the agency to give priority to locations in "rural town centers to strengthen the vitality and livability of the communities in which federal facilities are located."*

3.2.12 Solid and Hazardous Materials

1. Conduct an inspection for historic dump sites on the Hot Springs campus that could contain hazardous materials such as asbestos and lead-based paint, and conduct any required remediation before vacating the property.

3.2.13 Transportation and Parking

1. Travel distance to receive health care at other locations should VA Hot Springs campus close.
2. Travel distance affects timely access to emergency care.
3. Travel distance affects the length of time Veterans endure during group transport and waiting while numerous appointments are completed.
4. Travel distance is more difficult during extreme weather conditions.
5. Travel distance is more difficult to endure by aging Veterans.
6. Travel distance affects transportation budgets of Veterans' families, VA employees, volunteer groups, and government agencies transporting Veterans.
7. Availability of and access to public transportation (bus, air) to VA locations.
8. Availability of and access to VA or volunteer provided shuttle services.
9. Availability of shuttle/car-pool service for VA employees to work at other VA locations.
10. Pace and volume of traffic in Rapid City can be more difficult to navigate.
11. Local roads and sidewalks within the City of Hot Springs are more accessible for pedestrians, wheelchairs, and motorized scooters.
12. *Funding infrastructure (streets and utilities) improvements that serve the VA campus have taken priority over other infrastructure needs within the City of Hot Springs.*

3.2.14 Utilities

1. Further reduction of inflow to the Hot Springs wastewater treatment plant from the VA campus would disrupt the efficiency of the treatment plant processes and operations. Physical and mechanical alterations to the treatment plant would be required to process less wastewater.
2. Loss of revenue from reduced wastewater inflow from the VA campus would increase the processing costs for all Hot Springs customers/users.
3. *Funding infrastructure (streets and utilities) improvements that serve the VA campus have taken priority over other infrastructure needs within the City of Hot Springs.*
4. New facilities would follow "green energy" designs.

3.2.15 NEPA Process

1. VA decision-makers should visit the VA Hot Springs campus before implementing any reconfiguration.

2. Use of EIS results by VA decision-makers.
3. Identify VA decision-makers.
4. *Factual basis of and discrepancies with data used for purpose and need, alternatives, and impact analysis*.
5. Study area for EIS.
6. Criteria used for decision-making, including ranking and importance of the criteria.
7. EIS should be conducted with transparency and in an honest, fair, and unbiased manner.
8. Lengthy time period for making a decision on the reconfiguration proposal causes uncertainty for the Hot Springs community.
9. *Lengthy time period for making a decision on the reconfiguration proposal causes uncertainty for VA employees (current and future)*.
10. Decisions made before starting and completing EIS; timing of announcing and preparing EIS.
11. EIS is illegal because VA made the reconfiguration decision before completing an EIS.
12. Unusual to include any proposed alternatives before scoping is completed; VA's responsibility is to consider alternatives that come from scoping.
13. *Incorporation of comments from initial town hall meetings from 2011 into developing alternatives.*
14. Provide the public with sufficient notice of public meeting schedules and through appropriate contacts (media and organizations).
15. Select meeting locations that are accessible to the majority of the Veterans, including Native American Veterans.
16. Provide access to public meeting and EIS information; electronic access not available to all.
17. Provide a form that lists issues on which the public can provide comments.
18. EIS failed (and will fail) to address comments and recommendations.
19. *List of alternatives is biased, incomplete, and not responsive to public comments.*
20. *Majority of Veterans and the public do not want the VA Hot Springs campus closed.*
21. Relationship of the contractor preparing the EIS with the VA.

3.2.16 NEPA / NHPA Integration

1. VA must consult with consulting parties following 36 CFR 800.8(c), apply the guidance in the handbook for integrating NEPA with Section 106, and notify consulting parties of the timing of their input/consultation.
2. Substituting NEPA for Section 106 is not an effective way to address historic properties; uncertainty as to how VA will progress through the Section 106 consultation process.
3. NEPA and NHPA compliance started after VA made its preferred alternative known to the public.
4. NEPA and historic preservation laws require the buildings remain occupied to prevent deterioration.
5. *Incorporation of and compliance with relevant federal historic preservation laws and executive orders during the planning process for the undertaking*.
6. Assessment of impacts to historic properties when scope/size and location(s) of new facilities are yet to be determined.

7. Identification and selection of consulting parties.

3.2.17 Outside Scope of NEPA and EIS

1. Personal experiences with VA-provided or private-sector-provided care.
2. Wait time at VA facilities for health care appointments.
3. VA mission decisions regarding types of health care services provided.
4. VA mission decisions regarding how (VA or non-VA/purchased care) health care services are provided.
5. VA mission decisions regarding where health care services are provided.
6. Privatizing or decentralizing VA health care services, including management of VA facilities.
7. Timeliness of VA reimbursement to private providers.
8. Reduction ("downsizing") of health care services offered over the years at VA Hot Springs campus.
9. Sociological culture and attitude of Hot Springs community towards Veterans.
10. Advantages of rural, small-town setting for health care treatment and recovery, including "Veterans Town" community support and respect.
11. Requests for Congressional field hearing with House Veterans Affairs Committee.
12. Introduction of bills into Congress pertaining to the reconfiguration proposal and EIS process.
13. Availability of VA health care facilities in case of a national emergency.
14. Benefits offered to Veterans upon entry to military service versus benefits received upon completion of service.
15. Personal opinions of and accusations towards VA management and staff.

3.3 Incorporation of Comments and Issues into the EIS

The CEQ regulations implementing NEPA provide guidance as to content (40 CFR 1502.10), scope (40 CFR 1502.4), and impact analysis (40 CFR 1502.16) for an EIS. The scoping process (40 CFR 1501.7(a)(2)) allows for issues (comments) to be identified and eliminated from detailed study which are not considered significant.

Comments summarized by the categories representing the content of the EIS that are considered substantive are incorporated into the EIS. The substantive comments are assessed based on best available data to conduct a reasonable analysis.

Comments pertaining to the NEPA process and NEPA/NHPA integration are considered and addressed in the EIS if relevant and appropriate, or are incorporated into the ongoing public involvement and Section 106 consultation procedures.

Comments considered outside the NEPA process or outside the EIS scope, content, and impact analysis are not addressed or incorporated into the EIS. These types of comments generally address VA mission, administration, or policy actions. The analysis of reasonably foreseeable impacts must

be supported by credible scientific evidence, not be based on pure conjecture, and be within the rule of reason (40 CFR 1502.22), which generally applies to personal experiences, opinions, or beliefs.

Appendix A: Notices of Intent

the property and interests in property of, *inter alia,* persons listed on the Annex to the Order.

On July 30, 2004, the President issued Executive Order 13350, which, inter alia, replaced the Annex to Executive Order 13315 with a new Annex that included the names of individuals and entities, including individuals and entities that had previously been designated under Executive Order 12722 and related authorities.

The Department of the Treasury's Office of Foreign Assets Control has determined that the following individual and entities should be removed from the SDN List:

Individual

ABBAS, Kassim, Lerchesbergring 23A, D–60598, Frankfurt, Germany; DOB 7 Aug 1956;
POB Baghdad, Iraq (individual) [IRAQ2]

Entities

S.M.I. SEWING MACHINES ITALY S.P.A., Italy [IRAQ2]
EUROMAC TRANSPORTI INTERNATIONAL SRL, Via Ampere 5, Monza 20052, Italy [IRAQ2]
EUROMAC, LTD, 4 Bishops Avenue, Northwood, Middlesex, United Kingdom [IRAQ2]
BAY INDUSTRIES, INC., 10100 Santa Monica Boulevard, Santa Monica, CA [IRAQ2]

The removal of the names from the SDN List was effective as of April 29, 2014. All property and interests in property of the individual and the entities that are in or hereafter come within the United States or the possession or control of United States persons are now unblocked.

Dated: May 12, 2014.

Barbara C. Hammerle,

Acting Director, Office of Foreign Assets Control.

[FR Doc. 2014–11411 Filed 5–15–14; 8:45 am]

BILLING CODE 4810–AL–P

DEPARTMENT OF VETERANS AFFAIRS

Notice of Intent To Prepare an Integrated Environmental Impact Statement for the Department of Veterans Affairs, Black Hills Health Care System Proposed Improvements and Reconfiguration, Hot Springs and Rapid City, South Dakota

AGENCY: Department of Veterans Affairs (VA).

ACTION: Notice of intent

SUMMARY: Pursuant to the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4331 et seq.); the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (40 CFR Parts 1500–1508); VA's NEPA Implementing Guidance (38 CFR Part 26); Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C. Part 470F); and the Advisory Council on Historic Preservation Procedures for the Protection of Historic Properties (36 CFR Part 800 et seq.), VA intends to prepare an integrated environmental impact statement (EIS) for the proposed improvements to and reconfiguration of the VA Black Hills Health Care System (VA BHHCS) services in the Hot Springs and Rapid City, South Dakota, vicinities. The proposed action would involve reconfiguring existing services and expanding points of access to health care within the VA BHHCS service area to better serve the health care needs and distribution of Veterans in the VA BHHCS service area over the next 20 to 30 years. That area includes parts of South Dakota, northwestern Nebraska, and eastern Wyoming. The effects and impacts to be addressed will include those identified in 40 CFR 1508.8; i.e., ecological, aesthetic, historic, cultural, economic, social, and health, whether direct, indirect, or cumulative. Both beneficial and detrimental effects of the proposed action will be identified as well. As part of the scoping process, VA seeks public input on the relative importance of these and other areas of environmental concern, and suggestions regarding additional environmental impacts that should be evaluated.

DATES: With the publication of this notice, VA is initiating the scoping process to identify issues and concerns to be addressed in the integrated EIS. Federal, state, and local agencies, environmental organizations, businesses, other interested parties and the general public are encouraged to submit their written comments identifying specific issues or topics of environmental concern that should be addressed. VA will hold two or more public scoping meetings within the VA BHHCS service area; the dates, times, and locations of which will be announced and published at least 14 days prior to the meetings. All written comments on the proposal should be submitted by June 16, 2014. VA will consider all comments received during the 30-day public comment period in determining the scope of the integrated EIS.

ADDRESSES: Submit written comments on VA's notice of intent to prepare an integrated EIS through *www.Regulations.gov* or *vablackhillsfuture@va.gov.* Please refer to: ''VA BHHCS Notice of Intent to Prepare an Integrated EIS''. Comments may also be submitted to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Rd., Fort Meade, SD 57741

FOR FURTHER INFORMATION CONTACT: Staff Assistant to the Director, VA BHHCS, at the address above or by telephone, 605–720–7170. Documents related to the VA BHHCS proposed reconfiguration will be available for viewing on the VA BHHCS Web site: *http://www.blackhills.va.gov/VABlackHillsFuture/.*

SUPPLEMENTARY INFORMATION: In December 2011, VA made public a proposal to improve and reconfigure the Black Hills Health Care System services. The purpose of this proposed action is to enhance and maintain the quality and safety of care for Veterans in the 100,000 square-mile VA BHHCS service area, replace aging buildings for Veterans in Residential Rehabilitation and Treatment Programs (RRTP) and Community-Based Outpatient Clinics (CBOC), increase access to care closer to Veterans' homes, and reduce out-of-pocket expenses for Veterans' travel. VA BHHCS served approximately 18,650 Veterans in fiscal year 2012, a decrease from 20,500 in fiscal year 2009. VA projections estimate that within 10 years VA BHHCS will serve about 19,750 Veterans in the two hospitals (Hot Springs and Fort Meade) and nine CBOCs currently in operation.

The need for the reconfiguration of services is further substantiated by the following facts: (1) Veteran population centers are not in the same location as current VA facilities; (2) Difficulty recruiting and retaining qualified staff at current Hot Springs facility; (3) Difficulty maintaining high-quality, safe, and accessible care; (4) Long distances and travel times to receive specialty care; (5) Current residential treatment facilities and locations limit care available to Veterans; and (6) Higher operating costs than financial allocations.

At VA Hot Springs there are approximately 2,800 Veterans that receive primary care. About 5,500 Veterans visit the facility annually for some aspect of care. The operation of this small, highly rural facility located in a community of approximately 3,900 persons raises concerns about safety, quality of care, sustainability over time, recruitment and retention of staff, and cost of operations and maintenance and upgrades to the facility. Contributing factors are the difficulty complying with rules and laws governing handicapped

access, and the increasing age and cost of operating, maintaining and improving buildings ranging from 40 to over 100 years old.

At present, VA has identified seven potential action alternatives to be analyzed in the EIS: *Alternative A* would involve building/leasing a CBOC in Hot Springs and a Multi-Specialty Outpatient Clinic (MSOC) and 100-bed RRTP in Rapid City. *Alternative B* would involve building/leasing a 100-bed RRTP in Hot Springs and a MSOC in Rapid City. *Alternative C* would entail renovating Building 12 for a CBOC and the Domiciliary for a 100-bed RRTP at Hot Springs and building/leasing a MSOC at Rapid City. *Alternative D* would involve building/leasing a CBOC and 24-bed RRTP at Hot Springs and a MSOC and 76-bed RRTP at Rapid City. *Alternative E* would involve implementing a proposal put forward by the ''Save the VA'' committee, a Hot Springs public interest group, to repurpose VA Hot Springs as a multifaceted national demonstration project for Veterans care in a rural environment. *Alternative F* would be an as yet unidentified alternative use that might be proposed during the EIS process. *Supplemental Alternative G* would entail repurposing all or part of the Hot Springs campus through an enhanced-use lease or other agreement with another governmental agency or private entity in conjunction with Alternatives A through F. In addition to the above seven action alternatives, the EIS also will evaluate the impacts associated with the No Action or ''status quo'' alternative (*Alternative H*) as a basis for comparison to the action alternatives.

Potential issues and impacts to be addressed in the EIS will include, but not be limited to, physical and biological resources, cultural and historic resources, land use, socioeconomics, community services, transportation and parking, and cumulative effects. Relevant and reasonable measures that could alleviate or mitigate adverse effects and impacts also will be included. VA will undertake necessary consultations with other governmental agencies and consulting parties pursuant to the NHPA, Endangered Species Act, Clean Water Act, and other applicable environmental laws. Consultation will include, but not be limited to, the following Federal, Tribal, state, and local agencies: State and Tribal Historic Preservation Officers; U.S. Fish and Wildlife Service; U.S. Environmental Protection Agency; National Park Service; and the Advisory Council on Historic Preservation. Information related to the EIS process, including notices of public scoping and other informational meetings and hearings, will be available for viewing on the VA BHHCS Web site: *http://www.blackhills.va.gov/VABlackHillsFuture/*

VA anticipates that many of the issues to be addressed in assessing the impacts of the various alternatives will be broadly cultural in character; that is, they will involve potential impacts on the cultural environment as perceived by Veterans, their families, Indian tribes and communities of the area. Such impacts may include, but are not limited to: (a) Impacts on historic properties; (b) impacts on the cultural values ascribed to the Hot Springs and Fort Meade campuses by Veterans, local residents, Indian tribes and others; (c) impacts to ongoing or traditional cultural uses of such locations; and (d) impacts on archaeological, historical, and scientific data.

In the interests of efficiency, completeness, and facilitating public involvement, it is VA's intention that all cultural impacts be addressed together, in consultation with all appropriate parties. To facilitate this inclusive process, VA will incorporate into its NEPA analysis process the review procedures for historic properties usually carried out separately under 36 CFR 800.3 through 6 of the NHPA Section 106 implementing regulations. This process is described in 36 CFR 800.8(c) of those procedures and in the Council on Environmental Quality and Advisory Council on Historic Preservation handbook for integrating NEPA and Section 106 dated March 2013.

Signing Authority

The Secretary of Veterans Affairs, or designee, approved this document and authorized the undersigned to sign and submit the document to the Office of the Federal Register for publication electronically as an official document of the Department of Veterans Affairs. Jose D. Riojas, Chief of Staff, Department of Veterans Affairs, approved this document on May 6, 2014, for publication.

Dated: May 13, 2014.

Robert C. McFetridge,

Director, Regulation Policy and Management, Office of the General Counsel, Department of Veterans Affairs.

[FR Doc. 2014–11316 Filed 5–15–14; 8:45 am]

BILLING CODE 8320–01–P

DEPARTMENT OF VETERANS AFFAIRS

[OMB Control No. 2900–0404]

Agency Information Collection (Veteran's Application for Increased Compensation Based on Unemployability) Activity Under OMB Review

AGENCY: Veterans Benefits Administration, Department of Veterans Affairs.

ACTION: Notice.

SUMMARY: In compliance with the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C. 3501–3521), this notice announces that the Veterans Benefits Administration (VBA), Department of Veterans Affairs, will submit the collection of information abstracted below to the Office of Management and Budget (OMB) for review and comment. The PRA submission describes the nature of the information collection and its expected cost and burden; it includes the actual data collection instrument.

DATES: Comments must be submitted on or before July 14, 2014.

ADDRESSES: Submit written comments on the collection of information through *www.Regulations.gov,* or to Office of Information and Regulatory Affairs, Office of Management and Budget, Attn: VA Desk Officer; 725 17th St. NW., Washington, DC 20503 or sent through electronic mail to *oira_submission@omb.eop.gov.* Please refer to ''OMB Control No. 2900–0404'' in any correspondence.

FOR FURTHER INFORMATION CONTACT: Crystal Rennie, Enterprise Records Service (005R1B), Department of Veterans Affairs, 810 Vermont Avenue NW., Washington, DC 20420, (202) 632–7492 or email *crystal.rennie@va.gov.* Please refer to ''OMB Control No. 2900–0404.''

SUPPLEMENTARY INFORMATION:

Title: Veteran's Application for Increased Compensation Based on Unemployability, VA Form 21–8940.

OMB Control Number: 2900–0404.

Type of Review: Revision of a currently approved collection.

Abstract: VA Form 21–8940 is used by Veterans to file a claim for increased disability compensation based on unemployability. Claimants are required to provide current medical, educational, and occupational history in order for VA to determine whether he or she is unable to secure or follow a substantially gainful employment due to service-connected disabilities.

An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The **Federal Register** Notice with a 60-day comment period soliciting comments on this collection of information was published on January 3, 2014, at page 426.

Affected Public: Individuals or households.

Estimated Annual Burden: 18,000 hours.

Estimated Average Burden per Respondent: 45 minutes.

Frequency of Response: One-time.

Estimated Number of Respondents: 24,000.

Dated: June 9, 2014.

By direction of the Secretary.

Crystal Rennie,

Department Clearance Officer, Department of Veterans Affairs.

[FR Doc. 2014–13810 Filed 6–12–14; 8:45 am]

BILLING CODE 8320–01–P

DEPARTMENT OF VETERANS AFFAIRS

Notice of Intent To Prepare an Integrated Environmental Impact Statement for the Department of Veterans Affairs, Black Hills Health Care System Proposed Improvements and Reconfiguration, Hot Springs and Rapid City, South Dakota; Comment Period Extension

AGENCY: Department of Veterans Affairs (VA).

ACTION: Notice of intent; Comment period extension.

SUMMARY: The Department of Veterans Affairs (VA) published, in the **Federal Register** on May 16, 2014, the Notice of Intent to prepare an integrated environmental impact statement (EIS) for the proposed improvements to and reconfiguration of the VA Black Hills Health Care System (VA BHHCS) services in the Hot Springs and Rapid City, South Dakota vicinities. Due to public request and the unavailability of the regulations.gov public comment Web site, the comment period for the scoping process has been extended from June 16, 2014 to August 16, 2014.

DATES: Public comments must be received by August 16, 2014.

ADDRESSES: Submit written comments on VA's notice of intent to prepare an integrated EIS through *www.Regulations.gov* or *vablackhillsfuture@va.gov.* Please refer to: ''VA BHHCS Notice of Intent to Prepare an Integrated EIS''. Comments may also be submitted to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Rd., Fort Meade, SD 57741.

FOR FURTHER INFORMATION CONTACT: Staff Assistant to the Director, VA BHHCS, at the address above or by telephone, 605–720–7170. Documents related to the VA BHHCS proposed reconfiguration will be available for viewing on the VA BHHCS Web site: *http://www.blackhills.va.gov/VABlackHillsFuture/.*

Correction: In the **Federal Register** of May 16, 2014 in FR Doc. 2014–11316, on page 28603, in the second column, correct the **DATES** caption to read:

DATES: With the publication of this notice, VA is initiating the scoping process to identify issues and concerns to be addressed in the integrated EIS. Federal, state, and local agencies, environmental organizations, businesses, other interested parties and the general public are encouraged to submit their written comments identifying specific issues or topics of environmental concern that should be addressed. VA will hold two or more public scoping meetings within the VA BHHCS service area; the dates, times, and locations of which will be announced and published at least 14 days prior to the meetings. All written comments on the proposal should be submitted by August 16, 2014. VA will consider all comments received during the 90-day public comment period in determining the scope of the integrated EIS.

Extension: The public comment period for the scoping process for the integrated environmental impact statement for the proposed improvements to and reconfiguration of the VA Black Hills Health Care System services in the Hot Springs and Rapid City, South Dakota vicinities has been extended from June 16, 2014 to August 16, 2014.

Signing Authority

The Secretary of Veterans Affairs, or designee, approved this document and authorized the undersigned to sign and submit the document to the Office of the Federal Register for publication electronically as an official document of the Department of Veterans Affairs. Jose D. Riojas, Chief of Staff, Department of Veterans Affairs, approved the Notice of Intent on May 6, 2014, for publication.

Robert C. McFetridge,

Director of Regulations Policy and Management, Office of the General Counsel, Department of Veterans Affairs.

[FR Doc. 2014–13840 Filed 6–12–14; 8:45 am]

BILLING CODE 8320–01–P

Appendix B: Scoping Notices

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS: Wednesday, June 11, 2014, 2:30 – 4:30 p.m. and 6:30 – 8:30 p.m.
Mueller Center, Auditorium
801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY: Thursday, June 12, 2014, 6:30 – 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room
2111 N. LaCrosse Street, Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. Consultation on potential effects to historic resources, as required by Section 106 of the National Historic Preservation Act, will be integrated into this EIS process. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts. The content and format of the public scoping meetings at each location will be the same.

PINE RIDGE, SD:	Tuesday, June 24, 2014, 1:30 – 3:30 p.m. Prairie Wind Casino Convention Center, Lakota Dome Room U.S. 18, Pine Ridge, SD 57770
CHADRON, NE:	Tuesday, June 24, 2014, 7:00 – 9:00 p.m. Chadron State College, Student Center Ballroom 1000 Main Street, Chadron, NE 69337
ALLIANCE, NE:	Wednesday, June 25, 2014, 1:30 – 3:30 p.m. Alliance High School, Performing Arts Center 1450 Box Butte Avenue, Alliance NE 69301
SCOTTSBLUFF, NE:	Wednesday, June 25, 2014, 7:00 – 9:00 p.m. Gering Civic Center 1050 M Street, Gering, NE 69341
MISSION, SD:	Thursday, June 26, 2014, 1:00 – 3:00 p.m. Sinte Gleska University, Multipurpose facility/gym 101 Antelope Circle, Mission, SD 57555
PIERRE, SD:	Thursday, June 26, 2014, 7:00 – 9:00 p.m. Pierre Ramkota, Amphitheater II 920 W Sioux Ave, Pierre, SD 57501
NEWCASTLE, WY:	Friday, June 27, 2014, 1:30 – 3:30 p.m. U.S. Forest Service Office 1225 Washington Boulevard, Newcastle, WY 82701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at the listed meeting time, after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments **by August 16, 2014**:

- by email to vablackhillsfuture@va.gov
- online at www.regulations.gov, Docket VA-2014-VACO-0002
- online, direct to EIS contractor, at www.blackhillseis.com (option to submit anonymously)

- by mail to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Road, Fort Meade, SD 57741

This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act. Please continue to visit www.blackhills.va.gov/vablackhillsfuture/ for project updates.

PUBLIC SCOPING MEETINGS: ENVIRONMENTAL IMPACT STATEMENT FOR RECONFIGURATION OF VA BLACK HILLS HEALTH CARE SYSTEM

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide [illegible], safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS:
Wednesday, June 11, 2014, 2:30 - 4:30 p.m. and 6:30 - 8:30 p.m.
Mueller Center, Auditorium, 801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY:
Thursday, June 12, 2014, 6:30 - 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room, 2111 N. LaCrosse Street, Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System. Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

PUBLISH: May 22, 23, and 24, 2014 ZNEZ

Affidavit of Publication

BOX BUTTE COUNTY
STATE OF NEBRASKA } **SS.**

Tom Shaal, being first duly sworn, deposes and says that he is the Publisher of the Alliance Times-Herald, a legal newspaper, under the statutes of the State of Nebraska, published in Box Butte County; that said newspaper circulation in Box Butte County and that to his personal knowledge, the notice, a true copy of which is here to annexed, was published in said newspaper for 3 week on the following dates:

May 22, 23 and 24, 2014

Tom Shaal

Subscribed in my presence and sworn to before me this

24 **day of** May, **20**14

Fee $ 78.45

Marilyn Harris
Notary Public

GENERAL NOTARY - State of Nebraska
MARILYN HARRIS
My Comm. Exp. January 11, 2016

Federal I.D. Number 47-0368289

Affidavit of Publication

STATE OF SOUTH DAKOTA:
COUNTY OF LAWRENCE:

Letitia Lister of said County and State being first duly sworn, on her oath says: That the BLACK HILLS PIONEER is a legal daily newspaper of general circulation, printed and published in the City of Spearfish, in said County and State by Letitia Lister, and has been such a newspaper during the times hereinafter mentioned; and that said newspaper has a bonafide circulation of at least 200 copies weekly, and has been published within said County in the English language for at least one year prior to the first publication of the notice herein mentioned, and is printed in whole or in part in an office maintained at the place of publication; and that I, Letitia Lister, the undersigned, am the Publisher of said newspaper and have personal knowledge of all the facts stated in this affidavit; and that the advertisement headed:

Public Scoping Meetings

a printed copy of which is hereto attached, was printed and published in said newspaper for 3 successive ~~and consecutive weeks~~ days, the first publication being made on the 23rd day of May, 2014, and the last publication on the 27th day of May, 2014, that the full amount of fees charged for publishing same, to-wit: The sum of $51.74, insures solely to the benefit of the publisher of the BLACK HILLS PIONEER, that no agreement or understanding for a division thereof has been made with any person and that no part thereof has been agreed to be paid to any other person whomsoever.

Subscribed and sworn to before me this 28th day of May, 2014

Notary Public, Lawrence County, South Dakota
My commission expires: 10-24-2016

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS: Wednesday, June 11, 2014, 2:30 – 4:30 p.m. and 6:30 – 8:30 p.m.
Mueller Center, Auditorium

Capital Journal

AFFIDAVIT OF PUBLICATION

State of South Dakota, County of Hughes

Jackie Odom of said county, being, first duly sworn, on oath, says: That he/she is the publisher or an employee of the publisher of the Capital Journal, a daily newspaper published in the City of Pierre in said County of Hughes and State of South Dakota; that he/she has full and personal knowledge of the facts herein stated, that said newspaper is a legal newspaper as defined in SDCL 17-2-2.1 through 17-2-2.4 inclusive, that said newspaper has been published within the said County of Hughes and State of South Dakota, for at least one year next prior to the first publication of the attached public notice, and that the legal/display advertisement headed Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health... a printed copy of which, taken from the paper in which the same was published, and which is hereto attached and made a part of this affidavit, was published in said newspaper for three successive week(s) to wit:

May 23	20 14		20
May 27	20 14		20
May 28	20 14		20
	20		20
	20		20

That the full amount of the fee charged for the publication of the attached public notice inures to the sole benefit of the publisher or publishers; that no agreement or understanding for the division thereof has been made with any other person, and that no part thereof has been agreed to be paid to any person whomsoever; that the fees charged for the publication thereof are: $62.89.

Signed: Jackie Odom

subscribed and sworn to before me this 30 day of May 2014

Mary Bale

Notary Public in and for the County of Hughes, South Dakota.
My Commission expires 2-19, 2015.

Affidavit of Publication

STATE OF SOUTH DAKOTA

County of Pennington SS:

Brandyn Crawford being first duly sworn, upon his/her oath says: That he/she is now and was at all time hereinafter mentioned, an employee of the RAPID CITY JOURNAL, a corporation of Rapid City, South Dakota, the owner and publisher of the RAPID CITY JOURNAL, a legal and daily newspaper printed and published in Rapid City, in said County of Pennington, and has full and personal knowledge of all the facts herein stated as follows: that said newspaper is and at all of the times herein mentioned has been a legal and daily newspaper with a bonafide paid circulation of at least Two Hundred copies daily, and has been printed and published in the English language, at and within an office maintained by the owner and publisher thereof, at Rapid City, in said Pennington County, and has been admitted to the United States mail under the second class mailing privilege for at least one year prior to the publication herein mentioned; that the advertisement, a printed copy of which, taken from said Rapid City Journal, the paper in which the same was published, is attached to this sheet and made a part of this affidavit, was published in said paper once each Week for 3 successive Days, the first publication there of being on the 23rd day of May that the fees charged for the publication there of are 329 dollars and 94 cents.

Display Ad

Brandyn Crawford

Subscribed and sworn to before me this 2nd day of June, 2014.

Kerri Berard

Notary public

KERRI BERARD
NOTARY PUBLIC
MY COMM.EXP.AUGUST 21,2019

My commission expires

KERRI BERARD
SEAL NOTARY PUBLIC SOUTH DAKOTA SEAL

AFFIDAVIT OF PUBLICATION

Star Herald
PO Box 1709
Scottsbluff, NE 69363

State of Nebraska
County of Scotts Bluff } ss.

I, *Jennifer Harms* do solemnly swear that I am the Accounts Receivable Bookkeeper of the Star-Herald, a legal newspaper of general circulation, published daily except Mondays, at Scottsbluff, Scotts Bluff County, Nebraska; that the notice hereto attached and which forms a part of this affidavit was Published in said paper *3 (three)* consecutive week (s) in the issues published, respectively *May 23, 24, 25, 2014*

that said notice was published in the regular and entire issues and every number of the paper on the days mentioned, the same being the corresponding day of each week during the period of time of publication and that said notice was published in the newspaper proper and not in the supplement.

Jennifer Harms

SUBSCRIBED in my presence and sworn to before me on May 27, 2014

Conny Herdt
Notary Public

GENERAL NOTARY - State of Nebraska
CONNY HERDT
My Comm. Exp. Oct. 10, 2014

The publication fees amount to $ *98.72*

CASHPC13 - 53885031

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host scoping meetings to invite comments from stakeholders, government agencies, and members for an environmental impact statement (EIS) regarding figuration of the Black Hills Health Care System. The uate a range of alternatives, including no action, for re vices and resources to provide high-quality, safe, acc cost-effective care closer to where Veterans live. The input on the development of these alternatives, poten mental impacts from any alternatives, and suggestion impacts.

The content and format of the public scoping meetings cation will be the same.

HOT SPRINGS:
Wednesday, June
2:30-4:30 p.m. & 6:3
Mueller Center, Audi
801 S. 6th Street, Ho
SD 57747

RAPID CITY:
Thursday, June 12,
8:30 p.m.
Best Western Ramk
and Conference Ce
Sheridan Room
2111 N. LaCrosse
City, SD 57701

Doors will open 30 minutes before each meeting so can review displays and obtain handouts and form comments. A brief presentation will begin at 2:3 Springs only) and 6:30 p.m. (both locations), after wh will have the opportunity to provide oral comments VA's proposed realignment of the Black Hills Health C Those who cannot attend or who prefer to provide ments are encouraged to participate by submitting vablackhillsfuture@va.gov by June 26, 2014. This s ess complies with the VA's procedures for preparing the National Environmental Policy Act.

Published in the Star-Herald, Scottsbluff, Nebraska
3t. May 23, 24, 25, 2014

AFFIDAVIT OF PUBLICATION

State of South Dakota)
) ss.
County of Fall River)

Brett Nachtigall of Hot Springs, Fall River County, South Dakota, being duly sworn, upon oath says that he is the publisher of the Hot Springs Star, as a legal newspaper, as defined in SDCL 17-2-2.1 through 17-2-2.4 inclusive, and is published at Hot Springs, county and state aforesaid; that the advertisement headed –

#520 Public Meetings

a true printed copy thereof is hereunto annexed, was published in the said Hot Springs Star, in the regular and entire issue of said paper,

for one

successive issues, beginning with the

issue dated

May 27, 2014

and ending with the issue dated

May 27, 2014

That the full amount of the fee charged for the publication of said notice is

$ 20.02, and that no aggreement or understanding, for the division thereof, has been made with any other person, and that no part thereof has been agreed to be paid to any person whomsoever, that the whole amount insures to the benefit of the publishers of said newspaper.

Subscribed and sworn to before me this 29 day of May 2014.

Notary Public

My Commission Expires
December 3, 2019

LAURA TARRELL NOTARY SEAL PUBLIC STATE OF SOUTH DAKOTA

520

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS:
Wednesday, June 11, 2014
2:30 4:30 p.m. and 6:30 8:30 p.m.
Mueller Center, Auditorium, 801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY:
Thursday, June 12, 2014
6:30 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room, 2111 N. LaCrosse Street, Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VAs proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VAs procedures for preparing an EIS under the National Environmental Policy Act.

Published once at the total approximate cost of $20.02.

May 27

PROOF OF PUBLICATION

STATE OF NEBRASKA

COUNTY OF DAWES

I, Kerri Rempp, editor of the Chadron Record, being first duly sworn, on my oath, depose and say that the Chadron Record is a weekly legal newspaper for the publication of legal and other official notices, printed and published at Chadron, in Dawes County, Nebraska in the English language and having a bonafide circulation of at least three hundred copies weekly and which said Chadron Record has been published within said county of Dawes County for more than fifty-two successive weeks prior to the publication of the attached notice, and printed in an office maintained in Chadron, the place of publication, and that I have personal knowledge of the fact of the publication of said notice as hereafter specified.

That a legal notice of which the annexed is a printed copy, cut from the said Chadron Record and to which reference is hereby made as part of this affidavit was regularly published in said weekly newspaper once each week for 1 successive weeks, the first of said weekly publications having been so made in said newspaper on the 28 day of May, 2014; and the last of said weekly publications having been so made in said newspaper on the _____ day of _____, 20 _____; that the said notice was published in the regular and entire issue of every number of said newspapers during the time of publication; and that said published in the newspaper, and not in the supplement.

Kerri Rempp

Subscribed in my presence and sworn to before me this 28 day of May, A.D., 2014.

Raelynn Nuno Notary Public

Printer's Fee $ 26.14

Paid by _____

GENERAL NOTARY-State of Nebraska
RAELYNN NUNO
My Comm. Expires: July 1, 2015

910

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS:
Wednesday, June 11, 2014, 2:30 – 4:30 p.m. and 6:30 – 8:30 p.m.

Mueller Center, Auditorium
801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY:
Thursday, June 12, 2014, 6:30 – 8:30 p.m.

Best Western Ramkota Hotel and Conference Center, Sheridan Room
2111 N. LaCrosse Street, Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

Publish May 28, 2014

Affidavit of Publication

State of South Dakota)
)ss.
County of Custer)

Charles W. Najacht of said county, being duly sworn, on oath says that he is publisher of the Custer County Chronicle, a weekly newspaper printed and published in Custer City, said County of Custer and has full and personal knowledge of all the facts herein stated; that said newspaper is a legal newspaper and has a bona-fide circulation of at least two hundred copies weekly, and has been published within said County for fifty-two successive weeks next prior to the publication of the notice herein, mentioned, and was and is printed wholly or in part in an office maintained at said place of publication: that the

Dept of Veterans Affairs
Public Scoping Meetings

a printed copy of which, taken from the paper in which the same was published, is attached to this sheet, and is made a part of this Affidavit, was published in said newspaper at least once each week for 1 successive week(s), on which said newspaper was regularly published, to wit:

May 28, 2014; _____, _____;
_____, _____; _____, _____;
_____, _____; _____, _____;
_____, _____; _____, _____;
_____, _____; _____, _____;

the full amount of the fees for the publication of the annexed notice is $ 41.10.

Charles W. Najacht

Subscribed and sworn to me before this 28
of May, 20 14;

Norma Najacht
NOTARY PUBLIC
MY COMMISSION EXPIRES: May 5, 2018

Public Scoping Meetings:
Environmental Impact Statement for
Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to [illegible] comments from Veterans, [illegible] environmental agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS: Wednesday, June 11, 2014, 2:30 – 4:30 p.m. and 6:30 – 8:30 p.m.
Mueller Center, Auditorium
801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY: Thursday, June 12, 2014, 6:30 – 8:30 p.m.
Best Western Ramkota Hotel and Conference Center,
Sheridan Room
2111 N. LaCrosse Street, Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System. Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

Published once at an approximate cost of $41.10

AFFIDAVIT OF PUBLICATION

Gering Courier
PO Box 70
Gering, NE 69341

State of Nebraska
County of Scotts Bluff } ss.

I, *Jennifer Harms* do solemnly swear that I am the Accounts Receivable Bookkeeper of the Gering Courier, a legal newspaper of general circulation, published weekly at Gering, Scotts Bluff County, Nebraska; that the notice hereto attached and which forms a part of this affidavit was Published in said paper *1 (one)* consecutive week (s) in the issues published, respectively *May 29, 2014*

that said notice was published in the regular and entire issues and every number of the paper on the days mentioned, the same being the corresponding day of each week during the period of time of publication and that said notice was published in the newspaper proper and not in the supplement.

Jennifer Harms

SUBSCRIBED in my presence and sworn to before me on *May 29, 2014*

Conny Herdt
Notary Public

GENERAL NOTARY - State of Nebraska
CONNY HERDT
My Comm. Exp. Oct. 10, 2014

The publication fees amount to $ *35.12*

1CASHCH - 53885193

Public Scoping Meetings:
Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will consider a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS:
Wednesday, June 11, 2014
2:30 - 4:30 p.m. and 6:30 - 8:30 p.m.
Mueller Center, Auditorium
801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY:
Thursday, June 12, 2014, 6:30 - 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room
2111 N. LaCrosse Street, Rapid City, 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System. Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

Published in the Gering Courier, Gering, Nebraska
11, May 29, 2014

www.lakotacountrytimes.com

LAKOTA COUNTRY TIMES

Truth, Integrity and Lakota Spirit

316 Main St. PO Box 386, Martin, SD 57551 *Phone: 605-685-1868* *FAX:605-685-1870*

US Postal Permit Number: USPS 024-176

AFFIDAVIT OF PUBLICATION

State of South Dakota, County of Bennett:

Faith Cross of said county, being first duly sworn, on oath, says that he/she is the Editor/Publisher or an employee of the Publisher of the Lakota Country Times, a weekly newspaper published in the county of Bennett for circulation in the counties of Bennett and Shannon and Todd in South Dakota; That he/she has full and personal knowledge of the facts herein stated, that said newspaper is a legal newspaper as defined in SDCL 17-2-2.1 through 17-2-2,4 inclusive, that said newspaper has been published within the said County of Bennett and State of South Dakota, for a least one year prior to the first publication of the attached public notice, and that the legal advertisement headed

PUBLIC SCOPING MEETINGS

printed copy of which, taken from the paper in which the same was published, and which is hereto attached and made a part of this affidavit, was published in said newspaper for 1 successive week(s) to wit:

MAY 29	2014	Volume 10	Issue # 36
	2014	Volume 10	Issue #
	2014	Volume 10	Issue #
	2014	Volume 10	Issue #

That the full amount of the fee charged for the publication of the attached public notice inures to the sole benefit of the publisher or publishers; that no agreement or understanding for the division thereof has been made with any other person, and that no part thereof has been agreed to be paid to any person whomsoever; that the fees charged for the publication thereof are:

$ 46.92

Signed: Faith Cross

Subscribed and sworn to before me this date: JUNE 15, 2014, 2014

Signed: Connie Smith

Notary Public in and for the County of Bennett, South Dakota

My Commission expires Dec. 11, 2019

CONNIE L. SMITH
SEAL NOTARY PUBLIC SEAL
SOUTH DAKOTA

Affidavit Proof of Publication

I, Robert A. Bonnar do solemnly swear that I am Editor of the *News Letter Journal*, a newspaper of general circulation, printed and published each week at Newcastle, County of Weston, State of Wyoming; that the advertisement hereto attached, and which has been made a part of the affidavit, and a part of the proof of publication:

Meeting Notice
Public Scoping Meetings: Hot Springs, SD – June 11, 2014
Rapid City, SD – June 12, 2014
Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care Systems
Department of Veterans Affairs

Advertisement was printed the first having been Printed and made in said newspaper May 29, 2014

And the last on May 29, 2014

That said advertisement was printed and published in the newspaper proper and not a supplement
Subscribed and sworn before me on the 23rd day of June, 2014

Editor _____

Notary Public _____

Commission Expires: October 21, 2014

Becky M. Vodopich - Notary Public
County of Weston
State of Wyoming
My Commission Expires October 21, 2014

Meeting Notice

PUBLIC SCOPING MEETINGS: ENVIRONMENTAL IMPACT STATEMENT FOR RECONFIGURATION OF VA BLACK HILLS HEALTH CARE SYSTEM

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS:
Wednesday, June 11, 2014
2:30 – 4:30 p.m. and 6:30 – 8:30 p.m.
Mueller Center, Auditorium
801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY:
Thursday, June 12, 2014, 6:30 – 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room
2111 N. LaCrosse Street, Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

(Publish May 29 and June 5, 2014)

June 4
L20867331

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmehtal impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS:
Wednesday, June 11, 2014, 2:30 - 4:30 p.m. and 6:30 - 8:30 p.m.
Mueller Center, Auditorium
801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY:
Thursday, June 12, 2014, 6:30 - 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room
2111 N. LaCrosse Street, Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

(Published once at the total approximate cost of $29.95).
MEADE COUNTY TIMES

Affidavit of Publication

STATE OF SOUTH DAKOTA

County of Pennington SS:

Robert Evans being first duly sworn, upon his/her oath says: That he/she is now and was at all time hereinafter mentioned, an employee of the Rapid City Journal, a corporation of Rapid City, South Dakota, the owner and publisher of the MEADE COUNTY TIMES, a legal and daily newspaper printed and published in Sturgis, in said County of Meade, and has full and personal knowledge of all the facts herein stated as follows: that said newspaper is and at all of the times herein mentioned has been a legal and daily newspaper with a bonafide paid circulation of at least Two Hundred copies weekly, and has been printed and published in the English language, at and within an office maintained by the owner and publisher thereof, at Sturgis, in said Meade County, and has been admitted to the United States mail under the second class mailing privilege for at least one year prior to the publication herein mentioned; that the advertisement, a printed copy of which, taken from said Meade County Times, the paper in which the same was published, is attached to this sheet and made a part of this affidavit, was published in said paper once each day for one successive day, the first publication there of being on the 4th day of June that the fees charged for the publication there of are 29 dollars and 95 cents.

Robert J Evans

Subscribed and sworn to before me this 4th day of June, 2014.

Kerri Berard
Notary public

KERRI BERARD
NOTARY PUBLIC
MY COMM.EXP.AUGUST 21,2019

My commission expires

KERRI BERARD
SEAL NOTARY PUBLIC SOUTH DAKOTA SEAL

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS: Wednesday, June 11, 2014,
2:30 – 4:30 p.m. and 6:30 – 8:30 p.m.
Mueller Center, Auditorium
801 S. 6th Street,
Hot Springs, SD 57747

RAPID CITY: Thursday, June 12, 2014,
6:30 – 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room
2111 N. LaCrosse Street,
Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

CONNIE E. MONTGOMERY NOTARY PUBLIC
COUNTY OF WESTON
STATE OF WYOMING
MY COMMISSION EXPIRES OCTOBER 11, 2014

Affidavit of Publication

I, Lisa LeVasseur, Editor and Publisher of the WESTON COUNTY GAZETTE, a weekly newspaper published every Thursday at Upton, Wyoming, do solemnly swear that a copy of the notice as per clipping attached, was published weekly in the regular and entire issue of the said newspaper and not in any supplement thereof, for 3 week (s) commencing with the issue dated MAY 29, 2014 and ending with the issue dated MAY 29, 2014.

Lisa LeVasseur

Editor and Publisher

SUBSCRIBED AND SWORN TO BEFORE ME,

THIS 11TH **day of** June **, 2014.**

Connie E. Montgomery
Notary Public

My commission expires: 10/11, 2014.

Affidavit of Publication

STATE OF SOUTH DAKOTA

County of Pennington SS:

Brandyn Crawford being first duly sworn, upon his/her oath says: That he/she is now and was at all time hereinafter mentioned, an employee of the RAPID CITY JOURNAL, a corporation of Rapid City, South Dakota, the owner and publisher of the RAPID CITY JOURNAL, a legal and daily newspaper printed and published in Rapid City, in said County of Pennington, and has full and personal knowledge of all the facts herein stated as follows: that said newspaper is and at all of the times herein mentioned has been a legal and daily newspaper with a bonafide paid circulation of at least Two Hundred copies daily, and has been printed and published in the English language, at and within an office maintained by the owner and publisher thereof, at Rapid City, in said Pennington County, and has been admitted to the United States mail under the second class mailing privilege for at least one year prior to the publication herein mentioned; that the advertisement, a printed copy of which, taken from said Rapid City Journal, the paper in which the same was published, is attached to this sheet and made a part of this affidavit, was published in said paper once each week for one successive week, the first publication there of being on the 15th day of June that the fees charged for the publication there of are 1421 dollars and 75 cents.

Display Ad

Brandyn Crawford

Subscribed and sworn to before me this 18th day of July, 2014.

Kerri Berard

Notary public

KERRI BERARD
NOTARY PUBLIC
MY COMM.EXP.AUGUST 21,2019

My commission expires

KERRI BERARD
SEAL NOTARY PUBLIC SOUTH DAKOTA SEAL

AFFIDAVIT OF PUBLICATION

State of South Dakota)
) ss.
County of Fall River)

Brett Nachtigall of Hot Springs, Fall River County, South Dakota, being duly sworn, upon oath says that he is the publisher of the Hot Springs Star, as a legal newspaper, as defined in SDCL 17-2-2.1 through 17-2-2.4 inclusive, and is published at Hot Springs, county and state aforesaid; that the advertisement headed –

#543 Public Scoping Meeting

a true printed copy thereof is hereunto annexed, was published in the said Hot Springs Star, in the regular and entire issue of said paper,

for one

successive issues, beginning with the

issue dated

June 17, 20 14

and ending with the issue dated

_____, 20____

That the full amount of the fee charged for the publication of said notice is

$ 44.56, and that no aggreement or understanding, for the division thereof, has been made with any other person, and that no part thereof has been agreed to be paid to any person whomsoever, that the whole amount insures to the benefit of the publishers of said newspaper.

Brett Nachtigall

Subscribed and sworn to before me this 17 day of June 20 14.

Connie Gerard

Notary Public

My Commission Expires
July 29, 2015

CONNIE GERARD NOTARY SEAL PUBLIC STATE OF SOUTH DAKOTA

543

Public Scoping Meetings:
Environmental Impact Statement for
Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host additional public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

PINE RIDGE, SD:	Tuesday, June 24, 2014, 1:30 3:30 p.m. Prairie Wind Casino Convention Center, Lakota Dome Room U.S. 18, Pine Ridge, SD 57770
CHADRON, NE:	Tuesday, June 24, 2014, 7:00 9:00 p.m. Chadron State College, Student Center Ballroom 1000 Main Street, Chadron, NE 69337
ALLIANCE, NE:	Wednesday, June 25, 2014, 1:30 3:30 p.m. Alliance High School, Performing Arts Center 1450 Box Butte Avenue, Alliance NE 69301
SCOTTSBLUFF, NE:	Wednesday, June 25, 2014, 7:00 9:00 p.m. Gering Civic Center 1050 M Street, Gering, NE 69341
MISSION, SD:	Thursday, June 26, 2014, 1:00 3:00 p.m. Sinte Gleska University, Multipurpose facility/gym 101 Antelope Circle, Mission, SD 57555
PIERRE, SD:	Thursday, June 26, 2014, 7:00 9:00 p.m. Pierre Ramkota, Amphitheater II 920 W Sioux Ave, Pierre, SD 57501
NEWCASTLE, WY:	Friday, June 27, 2014, 1:30 3:30 p.m. U.S. Forest Service Office 1225 Washington Boulevard, Newcastle, WY 82701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at the listed meeting time, after which the public will have the opportunity to provide oral comments regarding the VAs proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments by August 16, 2014:

by email to vablackhillsfuture@va.gov

online at www.regulations.gov, Docket VA-2014-VACO-0002

online, direct to EIS contractor, at www.blackhillseis.com (option to submit anonymously)

by mail to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Road, Fort Meade, SD 57741

This scoping process complies with the VAs procedures for preparing an EIS under the National Environmental Policy Act. Please continue to visit www.blackhills.va.gov/vablackhillsfuture/ for project updates.

Published once at the total approximate cost of $44.56.

June 17

PROOF OF PUBLICATION

STATE OF NEBRASKA

COUNTY OF DAWES

I, Kerri Rempp, editor of the Chadron Record, being first duly sworn, on my oath, depose and say that the Chadron Record is a weekly legal newspaper for the publication of legal and other official notices, printed and published at Chadron, in Dawes County Nebraska in the English language and having a bonafide circulation of at least three hundred copies weekly and which said Chadron Record has been published within said county of Dawes County for more than fifty-two successive weeks prior to the publication of the attached notice, and printed in an office maintained in Chadron, the place of publication, and that I have personal knowledge of the fact of the publication of said notice as hereafter specified.

That a legal notice of which the annexed is a printed copy, cut from the said Chadron Record and to which reference is hereby made as part of this affidavit was regularly published in said weekly newspaper once each week for 1 successive weeks the first of said weekly publications having been so made in said newspaper on the 18 day of June, 20 14 and the last of said weekly publications having been so made in said newspaper on the _____ day of _____, 20 _____; that the said notice was published in the regular and entire issue of every number of said newspapers during the time of publication and that said published in the newspaper, and not in the supplement.

Kerri Rempp

Subscribed in my presence and sworn to before me this 18 day of June, A.D., 20 14.

Raelynn Nuno Notary Public

Printer's Fee $ 36.45

Paid by _____

GENERAL NOTARY-State of Nebraska
RAELYNN NUNO
My Comm. Expires: July 1, 2015

Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host additional public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

PINE RIDGE, SD: Tuesday, June 24, 2014, 1:30 – 3:30 p.m.

Prairie Wind Casino Convention Center, Lakota Dome Room

[illegible] Pine Ridge, SD 57770

CHADRON, NE: Tuesday, June 24, 2014, 7:00 – 9:00 p.m.

Chadron State College, Student Center Ballroom

1000 Main Street, Chadron, NE 69337

ALLIANCE, NE: Wednesday, June 25, 2014, 1:30 – 3:30 p.m.

Alliance High School, Performing Arts Center

1450 Box Butte Avenue, Alliance NE 69301

SCOTTSBLUFF, NE: Wednesday, June 25, 2014, 7:00 – 9:00 p.m.

Gering Civic Center

1050 M Street, Gering, NE 69341

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at the listed meeting time, after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments by August 16, 2014:

by email to vablackhillsfuture@va.gov

online at www.regulations.gov, Docket VA-2014-VACO-0002

online, direct to EIS contractor, at www.blackhillseis.com (option to submit anonymously)

by mail to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Road, Fort Meade, SD 57741

This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act. Please continue to visit www.blackhills.va.gov/vablackhillsfuture/ for project updates.

Publish June 18, 2014

PUBLIC SCOPING MEETINGS: ENVIRONMENTAL IMPACT STATEMENT FOR RECONFIGURATION OF VA BLACK HILLS HEALTH CARE SYSTEM

The Department of Veterans Affairs (VA) will host additional public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

PINE RIDGE, SD: Tuesday, June 24, 2014, 1:30 - 3:30 p.m. Prairie Wind Casino Convention Center, Lakota Dome Room U.S. 18, Pine Ridge, SD 57770

CHADRON, NE: Tuesday, June 24, 2014, 7:00 - 9:00 p.m. Chadron State College, Student Center Ballroom, 1000 Main Street, Chadron, NE 69337

ALLIANCE, NE: Wednesday, June 25, 2014, 1:30 - 3:30 p.m. Alliance High School, Performing Arts Center, [redacted] Alliance NE 69301

SCOTTSBLUFF, NE: Wednesday, June 25, 2014, 7:00 - 9:00 p.m. Gering Civic Center, 1050 M Street, Gering, NE 69341

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at the listed meeting time, after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments by August 16, 2014

o by email to vabblackhillsfuture@va.gov

Affidavit of Publication

BOX BUTTE COUNTY } SS.
STATE OF NEBRASKA }

Tom Shaal, being first duly sworn, deposes and says that he is the Publisher of the Alliance Times-Herald, a legal newspaper, under the statutes of the State of Nebraska, published in Box Butte County; that said newspaper circulation in Box Butte County and that to his personal knowledge, the notice, a true copy of which is here to annexed, was published in said newspaper for 3 week on the following dates:

June 13, 14 and 16, 2014

Tom Shaal

Subscribed in my presence and sworn to before me this

16 **day of** June **, 2014**

Fee $ 106.29 PAID

Marilyn Harris
Notary Public

GENERAL NOTARY - State of Nebraska
MARILYN HARRIS
My Comm. Exp. January 11, 2016

Federal I.D. Number 47-0368289

AFFIDAVIT OF PUBLICATION OF NEWSPAPER
NOTICE OF PUBLIC HEARING

THE STATE OF SOUTH DAKOTA

COUNTY OF Pennington

BEFORE ME, the undersigned authority, on this day personally appeared Jackie Giago, publisher (OR REPRESENTATIVE) of Native Sun News, who, being by me duly sworn, upon oath deposes and says:

That the attached NOTICE OF PUBLIC HEARING was published in the NATIVE SUN NEWS, a newspaper published in the English language and of general circulation in the City of RAPID CITY, SOUTH DAKOTA and in the territory proposed to be annexed, which said territory is described in said NOTICE OF PUBLIC HEARING, in the following issue: 13 Volume 6, 20 14, and that the attached newspaper clipping is a true and correct copy of said published notice.

Signed: Jackie Giago

SWORN TO AND SUBSCRIBED BEFORE ME, this the 19th day of June, 20 14

Christy C. Tibbitts
Notary Public in and for Pennington County, South Dakota

Commission expiring March 11, 2017

(SEAL)

Published at a rate of $ 13.20

www.lakotacountrytimes.com

LAKOTA COUNTRY TIMES

Truth, Integrity and Lakota Spirit

316 Main St. PO Box 386, Martin, SD 57551 *Phone: 605-685-1868* *FAX:605-685-1870*

US Postal Permit Number: USPS 024-176

AFFIDAVIT OF PUBLICATION

State of South Dakota, County of Bennett:

Faith Cross of said county, being first duly sworn, on oath, says that he/she is the Editor/Publisher or an employee of the Publisher of the Lakota Country Times, a weekly newspaper published in the county of Bennett for circulation in the counties of Bennett and Shannon and Todd in South Dakota; That he/she has full and personal knowledge of the facts herein stated, that said newspaper is a legal newspaper as defined in SDCL 17-2-2.1 through 17-2-2,4 inclusive, that said newspaper has been published within the said County of Bennett and State of South Dakota, for a least one year prior to the first publication of the attached public notice, and that the legal advertisement headed

PUBLIC SCOPING MEETINGS

printed copy of which, taken from the paper in 2 successive week(s) to wit:

MAY 29	2014	Volume 10	Issue # 36
JUNE 19	2014	Volume 10	Issue # 39
	2014	Volume 10	Issue #
	2014	Volume 10	Issue #

That the full amount of the fee charged for the publication of the attached public notice inures to the sole benefit of the publisher or publishers; that no agreement or understanding for the division thereof has been made with any other person, and that no part thereof has been agreed to be paid to any person whomsoever; that the fees charged for the publication thereof are:

$ 70.38 AND $46.92 =$117.30

Signed: Faith Cross

Subscribed and sworn to before me this date: JUNE 30, 2014, 2014

Signed: Connie Smith

Notary Public in and for the County of Bennett, South Dakota

My Commission expires Dec. 11, 2019

CONNIE L. SMITH
SEAL NOTARY PUBLIC SEAL
SOUTH DAKOTA

Affidavit Proof of Publication

I, Robert A. Bonnar do solemnly swear that I am Editor of the *News Letter Journal*, a newspaper of general circulation, printed and published each week at Newcastle, County of Weston, State of Wyoming; that the advertisement hereto attached, and which has been made a part of the affidavit, and a part of the proof of publication:

Meeting Notice
Public Scoping Meetings: Newcastle, WY – June 27, 2014
Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care Systems
Department of Veterans Affairs

Advertisement was printed the first having been Printed and made in said newspaper June 19, 2014

And the last on June 19, 2014

That said advertisement was printed and published in the newspaper proper and not a supplement
Subscribed and sworn before me on the 23rd day of June, 2014

Editor Robert A. Bonnar

Notary Public Becky M. Vodopich

Commission Expires: October 21, 2014

Becky M. Vodopich - Notary Public
County of Weston
State of Wyoming
My Commission Expires October 21, 2014

Meeting Notice

PUBLIC SCOPING MEETINGS: ENVIRONMENTAL IMPACT STATEMENT FOR RECONFIGURATION OF VA BLACK HILLS HEALTH CARE SYSTEM

The Department of Veterans Affairs (VA) will host an additional public scoping meeting to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

NEWCASTLE, WY:
Friday, June 27, 2014, 1:30 – 3:30 p.m.
U.S. Forest Service Office
1225 Washington Boulevard,
Newcastle, WY 82701

Doors will open 30 minutes before the meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at the listed meeting time, after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments by August 16, 2014:

by email to vablackhillsfuture@va.gov online at www.regulations.gov, Docket VA-2014-VACO-0002 online, direct to EIS contractor, at www.blackhillseis.com (option to submit anonymously) by mail to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Road, Fort Meade, SD 57741

This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act. Please continue to visit www.blackhills.va.gov/vablackhillsfuture/ for project updates.

(Publish June 19, 2014)

AFFIDAVIT OF PUBLICATION

Gering Courier
PO Box 70
Gering, NE 69341

State of Nebraska
County of Scotts Bluff } ss.

I, Jennifer Harms do solemnly swear that I am the Accounts Receivable Bookkeeper of the Gering Courier, a legal newspaper of general circulation, published weekly at Gering, Scotts Bluff County, Nebraska; that the notice hereto attached and which forms a part of this affidavit was Published in said paper 1 (one) consecutive week (s) in the issues published, respectively June 19, 2014

that said notice was published in the regular and entire issues and every number of the paper on the days mentioned, the same being the corresponding day of each week during the period of time of publication and that said notice was published in the newspaper proper and not in the supplement.

Jennifer Harms

SUBSCRIBED in my presence and sworn to before me on 6/19/14.

Debra K. Flowers
Notary Public

The publication fees amount to $ 39.32

1LABAT - 53887105

GENERAL NOTARY - State of Nebraska
DEBRA K. FLOWERS
My Comm. Exp. October 8, 2017

See attached

~~

Appendix C: New Releases

Black Hills Health Care System
Department of Veterans Affairs

VA HEALTH CARE Defining EXCELLENCE in the 21st Century

FOR FURTHER INFORMATION CONTACT:
Teresa Forbes, Public Affairs Officer
605.720.7170 or 605-490-5074
www.blackhills.va.gov

News Release

FOR IMMEDIATE RELEASE

May 19, 2014

VA Black Hills Health Care System (VA BHHCS) announces the publication of the Notice of Intent in the Federal Register

The Department of Veterans Affairs (VA) Black Hills Health Care System (BHHCS) announced today the publication of the Notice of Intent (NOI) in the Federal Register on Friday, May 16th, 2014. The NOI signaled the formal start of the Integrated Environmental Impact Statement (EIS) process regarding VA BHHCS' proposal to reconfigure the services of VA BHHCS and the Hot Springs VA campus.

The NOI specifies that all written comments on the proposal should be submitted by June 16th, 2014. VA will consider all comments received during the 30-day public comment period in determining the scope of the integrated EIS.

The methods to submit written comments on VA's notice of intent to prepare an integrated EIS are through www.Regulations.gov or vablackhillsfuture@va.gov. Please refer to: ``VA BHHCS Notice of Intent to Prepare an Integrated EIS''. Comments may also be submitted to the Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Rd., Fort Meade, SD 57741. Public meetings are being planned; notifications about the meetings dates, times, and locations will be published 14 days in advance of the meetings.

Veterans, their families, and community members should continue to use the VA BHHCS website www.blackhills.va.gov as a resource for information about the EIS process.

# # #

Black Hills Health Care System
Department of Veterans Affairs

VA HEALTH CARE Defining EXCELLENCE in the 21st Century

FOR FURTHER INFORMATION CONTACT:
Teresa Forbes, Public Affairs Officer
605-720-7170 or 605-490-5074
www.blackhills.va.gov

News Release

FOR IMMEDIATE RELEASE

May 21, 2014

VA Black Hills Health Care System (VA BHHCS) Announces Public Scoping Meetings: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

The Department of Veterans Affairs (VA) will host three public scoping meetings to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the Black Hills Health Care System. The EIS will evaluate a range of alternatives, including no action, for realigning services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. The VA requests input on the development of these alternatives, potential environmental impacts from any alternatives, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS: Wednesday, June 11, 2014, 2:30 – 4:30 p.m. and 6:30 – 8:30 p.m.
Mueller Center, Auditorium
801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY: Thursday, June 12, 2014, 6:30 – 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room
2111 N. LaCrosse Street, Rapid City, SD 57701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. A brief presentation will begin at 2:30 p.m. (Hot Springs only) and 6:30 p.m. (both locations), after which the public will have the opportunity to provide oral comments regarding the VA's proposed realignment of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments to vablackhillsfuture@va.gov by June 26, 2014. This scoping process complies with the VA's procedures for preparing an EIS under the National Environmental Policy Act.

# # #

Black Hills Health Care System
Department of Veterans Affairs

VA HEALTH CARE Defining EXCELLENCE in the 21st Century

FOR FURTHER INFORMATION CONTACT:
Teresa Forbes, Public Affairs Officer
605.720.7170 or 605-490-5074
www.blackhills.va.gov

News Release

FOR IMMEDIATE RELEASE

6/10/2014

Additional Public Scoping Meetings and Public Comment Period Extension: Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

Seven additional scoping meetings have been scheduled by the Department of Veterans Affairs (VA) to invite comments from Veterans, stakeholders, government agencies, and members of the public for an environmental impact statement (EIS) regarding the reconfiguration of the VA Black Hills Health Care System. VA is also extending the public comment period for EIS scoping from June 16, 2014 to August 16, 2014.

The EIS will evaluate the proposal to realign services and resources to provide high-quality, safe, accessible, and cost-effective care closer to where Veterans live. Six alternatives to implement the proposal, a supplemental re-use alternative, and no action will be assessed. Consultation on potential effects to historic resources, as required by Section 106 of the National Historic Preservation Act, will be integrated into this EIS process. The VA requests input on the development of the alternatives, potential environmental impacts from any alternative, and suggestions to mitigate impacts.

The content and format of the public scoping meetings at each location will be the same.

HOT SPRINGS, SD: Wednesday, June 11, 2014, 2:30 – 4:30 p.m. and 6:30 – 8:30 p.m.
Mueller Center, Auditorium
801 S. 6th Street, Hot Springs, SD 57747

RAPID CITY, SD: Thursday, June 12, 2014, 6:30 – 8:30 p.m.
Best Western Ramkota Hotel and Conference Center, Sheridan Room
2111 N. LaCrosse Street, Rapid City, SD 57701

PINE RIDGE, SD: Tuesday, June 24, 2014, 1:30 – 3:30 p.m.
Prairie Wind Casino Convention Center, Lakota Dome Room
U.S. 18, Pine Ridge, SD 57770

CHADRON, NE: Tuesday, June 24, 2014, 7:00 – 9:00 p.m.
Chadron State College, Student Center Ballroom
1000 Main Street, Chadron, NE 69337

ALLIANCE, NE: Wednesday, June 25, 2014, 1:30 – 3:30 p.m.
Alliance High School, Performing Arts Center
1450 Box Butte Avenue, Alliance NE 69301

SCOTTSBLUFF, NE: Wednesday, June 25, 2014, 7:00 – 9:00 p.m.
Gering Civic Center
1050 M Street, Gering, NE 69341

MISSION, SD: Thursday, June 26, 2014, 1:00 – 3:00 p.m.
Sinte Gleska University, Multipurpose facility/gym
101 Antelope Circle, Mission, SD 57555

PIERRE, SD: Thursday, June 26, 2014, 7:00 – 9:00 p.m.
Pierre Ramkota, Amphitheater II
920 W Sioux Ave, Pierre, SD 57501

NEWCASTLE, WY: Friday, June 27, 2014, 1:30 – 3:30 p.m.
U.S. Forest Service Office
1225 Washington Boulevard, Newcastle, WY 82701

Doors will open 30 minutes before each meeting so participants can review displays and obtain handouts and forms for written comments. Following a brief presentation, the public will have the opportunity to provide oral comments regarding the VA's proposed reconfiguration of the Black Hills Health Care System.

Those who cannot attend or who prefer to provide written comments are encouraged to participate by submitting comments no later than August 16, 2014:

- by email to vablackhillsfuture@va.gov
- online at www.regulations.gov, Docket ID VA-2014-VACO-0002
- Submit direct to EIS contractor at www.blackhillseis.com (with option to submit anonymously)
- by mail to: Staff Assistant to the Director
  VA Black Hills Health Care System
  113 Comanche Road
  Fort Meade, SD 57741

# # #

Appendix D: Scoping Meeting Materials, Displays, and Presentation

INFORMATION SHEET
PUBLIC SCOPING MEETING
Environmental Impact Statement for
VA Black Hills Health Care System Reconfiguration

Black Hills Health Care System
Department of Veteran Affairs

National Environmental Policy Act (NEPA)

- Federal agency must consider environmental impacts of their proposal in deciding what action to take
- Prepare an Environmental Impact Statement (EIS) to determine if the proposed action or alternatives have potential to significantly impact the natural and human (social, economic) environment
- Identify reasonable measures to avoid or minimize environmental harm

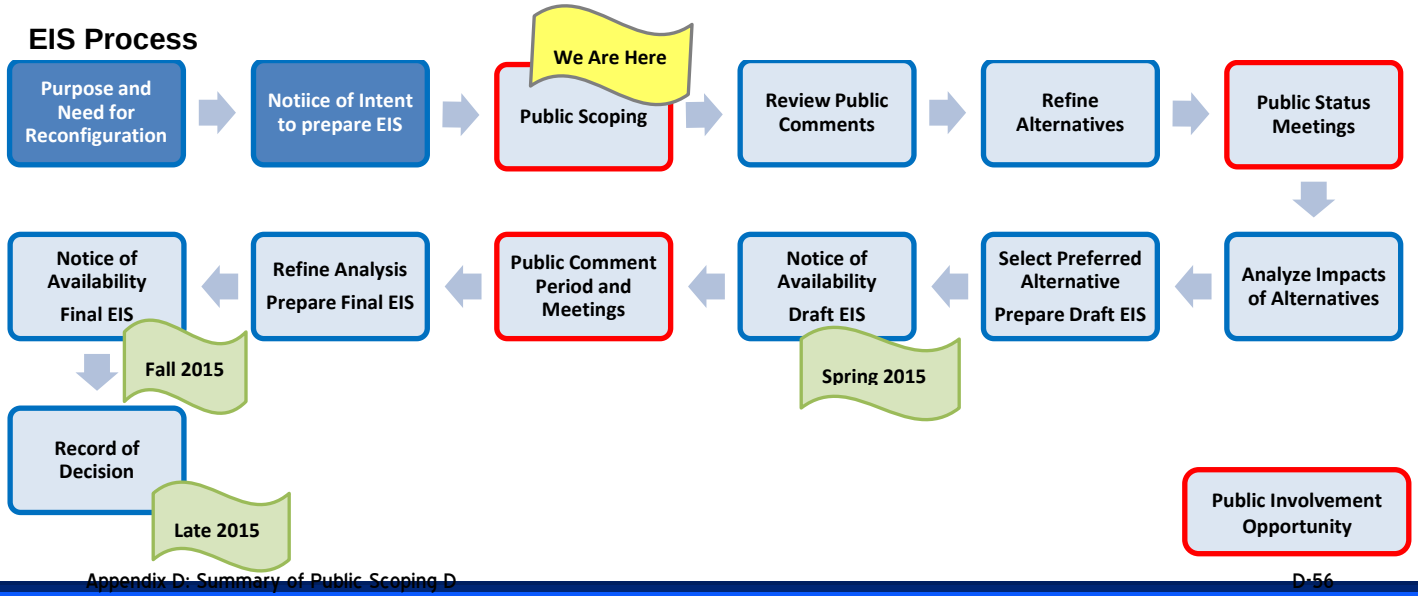
Scoping Process

- Involve public with identifying the issues and resources to evaluate in the EIS
- Receive public and agency input on alternatives, impacts, and mitigation options
- Use comments in preparing EIS

Purpose of and Need for Health Care System Reconfiguration

- ***Purpose*:** Provide quality, safe, accessible health care for Veterans well into the 21st century by:
  - Enhancing and maintaining quality and safety of care in the 100,000-square-mile service area
  - Replacing aging and ADA-noncompliant buildings for Veterans in Residential Rehabilitation and Treatment Programs and Community-Based Outpatient Clinics
  - Increasing access to care closer to Veterans' homes
  - Reducing out-of-pocket expenses for Veterans' travel
- ***Need:***
  - Veteran population centers are not in the same location as current VA facilities
  - Difficulty recruiting and retaining qualified staff at Hot Springs facility
  - Difficulty maintaining high-quality, safe, and accessible care
  - Long distances and travel times to receive specialty care
  - Current residential treatment facilities and locations limit care available to single parent Veterans and handicapped Veterans, and limit enhancements of the recovery model of care
  - Higher operating costs than financial allocations

EIS Process



Alternatives

	Hot Springs	Rapid City
A	CBOC – build/lease; vacate VA campus	MSOC, RRTP (100 beds) – build/lease
B	CBOC, RRTP (100 beds) – build/lease; vacate VA campus	MSOC – build/lease
C	CBOC – renovate Bldg 12; RRTP (100 beds) – renovate Domiciliary	MSOC – build/lease
D	CBOC, RRTP (24 beds) – build/lease; vacate VA campus	MSOC, RRTP (76 beds) – build/lease
E*	RRTP (200 beds) – renovate Domiciliary; Bldg 12 (inpatient) – renovate; other upgrades/renovations – new programs & services	no change
F	to be determined	to be determined
G**	future re-use of all or part of VA campus	no change
H	no action – status quo	no action – status quo

* "Save the VA" ** Supplement to Alternatives A–D CBOC – Community Based Outpatient Clinic
MSOC – Multi Specialty Outpatient Clinic RRTP – Residential Rehabilitation Treatment Program

"Save the VA" Alternative

- Renovate existing hospital and domiciliary instead of *construction* or *lease* of a new facility.
- Expand and restore hospital healthcare services at Hot Springs VA for a length of time (recommended 10 years) to get baseline data regarding Veteran need for and access to healthcare, on which to support future alignment plans.
- Engage Compensated Work Therapy (CWT) Veterans and teach historic building preservation standards and methods to support VA maintenance program of the National Historic Landmark and other recognized historic structures in the Black Hills.
- Expand on educational opportunities for Veterans and staff in the catchment area, including the Pine Ridge Indian Reservation.
- Undertake expanded study of effectiveness of PTSD/TBI/ Substance Abuse Treatment in a therapeutic **rural setting**.
- Utilize expanded work-therapy programs, educational opportunities, and physical and mental programs to treat homeless Veterans, and assist unemployed and underemployed Veterans.

Analysis of Environmental Resources

Human Environment	
Aesthetics	Community Services
Cultural Resources	Solid / Hazardous Materials
Noise	Transportation / Parking
Land Use	Utilities
Socioeconomics	Environmental Justice
Physical Environment	
Air Quality	Geology / Soils
Floodplains / Wetlands	Hydrology / Water Quality
Biological Environment	
Wildlife / Habitat	

National Historic Preservation Act (NHPA)

- Requires a federal agency to determine the effects of their action on historic properties
- Regulations permit "substitution" of NEPA review for the Section 106 compliance process
- Identify consulting parties during scoping process
- Identify and evaluate historic properties concurrently with other resources
- Consult with tribal governments
- Assess potential effects to Battle Mountain Sanitarium National Historic Landmark and other cultural resources
- Opportunities for input from consulting parties and public before releasing Draft EIS (see EIS process graph)
- Commit to mitigation strategy in Record of Decision if preferred alternative affects a historic property

Photos: Battle Mountain Sanitarium Building 1 – Rotunda (top); vintage aerial view (bottom)

COMMENT FORM

Public Scoping

Black Hills Health Care System
Department of Veteran Affairs

VA BLACK HILLS HEALTH CARE SYSTEM RECONFIGURATION

Environmental Impact Statement

PLEASE PRINT

Name:		**Organization:**
Address:		**City:**
State:	**Zip:**	**Add to Mailing List?** ☐ **No** ☐ **Yes**
Comments:		

Comments must be postmarked or sent electronically by **August 16, 2014.** Email to vablackhillsfuture@va.gov. Postal mail to address on reverse. Online submission via www.regulations.gov (Docket ID VA-2014-VACO-0002). Online submission direct to EIS contractor at www.blackhillseis.com (with option to submit anonymously).

FOLD AND TAPE – DO NOT STAPLE

From:

First
Class
Stamp

Staff Assistant to the Director
VA Black Hills Health Care System
113 Comanche Road
Fort Meade, SD 57741

FOLD AND TAPE – DO NOT STAPLE

MAILING LIST

VA Black Hills Health Care System Reconfiguration Environmental Impact Statement

PUBLIC SCOPING MEETING

Location:_____

Name & Address (PLEASE PRINT)
NAME:
ADDRESS:
CITY/STATE/ZIP:
ORGANIZATION:
NAME:
ADDRESS:
CITY/STATE/ZIP:
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Environmental Impact Statement for Reconfiguration of VA Black Hills Health Care System

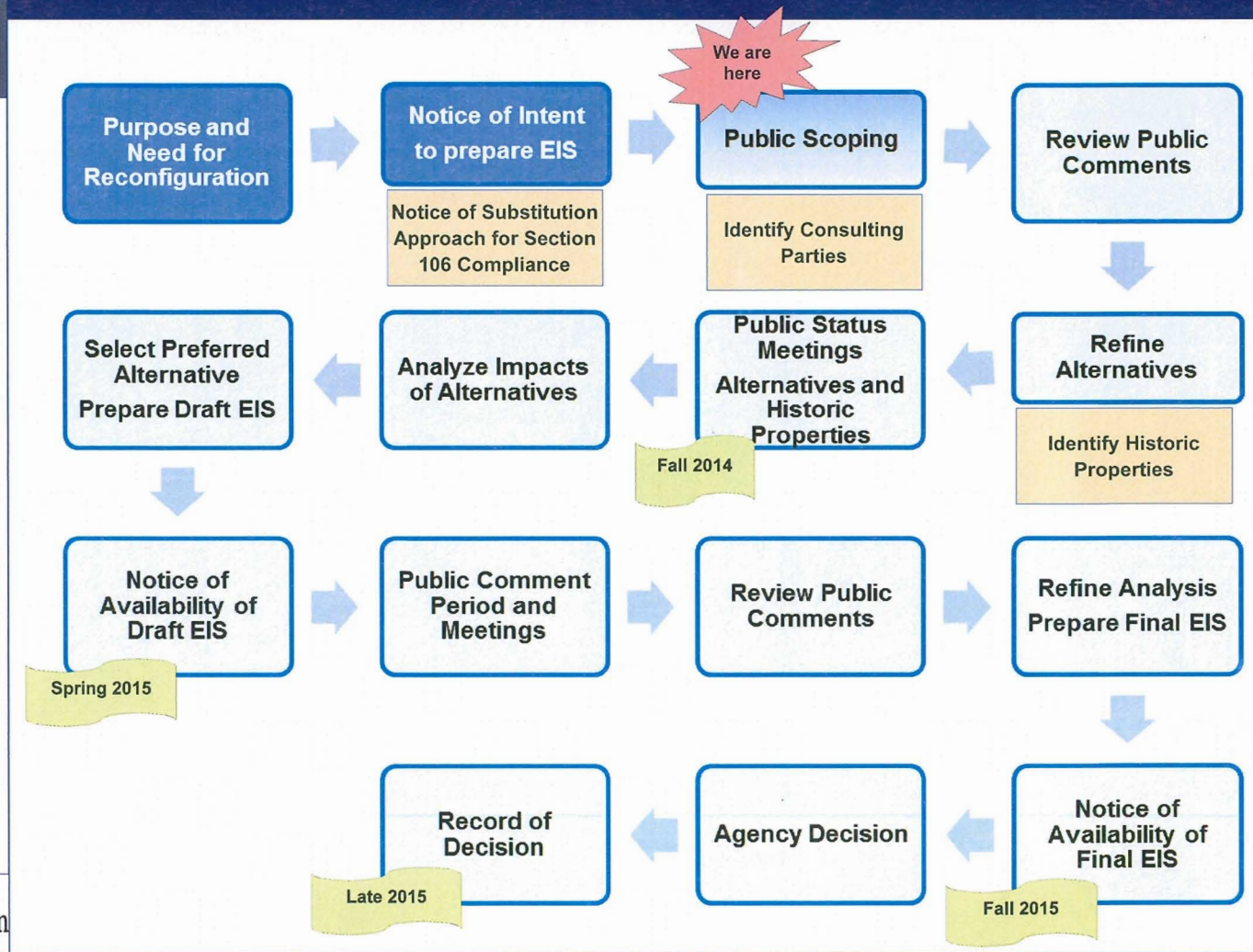
The *National Environmental Policy Act* requires federal agencies to evaluate the environmental impacts of their actions.

This EIS will:

- State the purpose and need for the health care system reconfiguration
- Describe a range of alternatives for implementing the proposed action
- Analyze the potential for environmental impacts of the alternatives
- Identify possible mitigation

Compliance with Section 106 of the *National Historic Preservation Act* is integrated into this NEPA process.

Black Hills Health Care System
Department of Veteran Affairs



Public Involvement: EIS for Reconfiguration of VA Black Hills Health Care System

Scoping is your opportunity to provide input to the alternatives and help us improve our analysis of their potential environmental impacts.

Scoping includes:

- Determining the scope and the significant issues to be analyzed in depth in the EIS.
- Identifying and eliminating from detailed study the issues that are not significant or not related to the agency decision at hand.
- Identifying environmental review and consultation requirements.

Dec 2011	VA announced the proposal to reconfigure the Black Hills Health Care System.
2011–2012	VA held 15 public town hall meetings to seek Veteran and stakeholder feedback.
May 2012	VA held a *National Historic Preservation Act* Section 106 consultation meeting related to the reconfiguration proposal.
May 16 – Aug 16, 2014	Public scoping period, with scoping meetings in 10 towns in June.
Fall 2014	Public status update meetings—details on alternatives and historic properties
Spring 2015	Draft EIS published for public review and comment.
Fall 2015	Final EIS available to public

Black Hills Health Care System
Department of Veteran Affairs

Purpose and Need for Reconfiguration of VA Black Hills Health Care System

The "purpose and need" element of an EIS explains why the action being proposed is needed, and serves as the basis for developing a reasonable range of alternatives.

Need: underlying condition or problem that leads the agency to propose the action.

Purpose: objectives of proposed action that address the underlying condition or correct the problem.

Black Hills Health Care System
Department of Veteran Affairs

Purpose of Action

Provide quality, safe, accessible health care for Veterans well into the 21st century by:

- Enhancing and maintaining quality and safety of care in the 100,000-square-mile VA Black Hills Health Care System service area
- Replacing aging, ADA-noncompliant buildings for Veterans in Residential Rehabilitation and Treatment Programs and Community-Based Outpatient Clinics
- Increasing access to care closer to Veterans' homes
- Reducing out-of-pocket expenses for Veteran's travel

Need for Action

- Veteran population centers are not in the same location as current VA facilities
- Difficulty recruiting and retaining qualified staff at current Hot Springs facility
- Difficulty maintaining high-quality, safe, and accessible care
- Long distances and travel times to receive specialty care
- Current residential treatment facilities and locations limit care available to single parent Veterans and handicapped Veterans, and limit the enhancement of the recovery model of care

Alternatives for Reconfiguration of VA Black Hills Health Care System

- All reasonable alternatives are evaluated in the EIS (40 CFR 1502.14).
- Reasonable alternatives are technically and economically practicable or feasible, and meet the purpose and need for the proposed action.
- The No Action alternative must be considered, and also provides a baseline for comparing impacts among alternatives.

Location	Alternatives*						
	A	B	C	D	E "Save the VA"	G Supplemental Alternative	H No Action
Hot Springs	CBOC ~~Existing VA Campus~~	CBOC RRTP 100 beds ~~Existing VA Campus~~	Building 12 Renovation CBOC Domiciliary Renovation RRTP–100 beds	CBOC RRTP 24 beds ~~Existing VA Campus~~	Building 12 Renovation Continue inpatient services Domiciliary Renovation RRTP–200 beds Other Upgrades / Renovations New programs & services	Future re-use of all or part of the existing Hot Springs VA campus by others: Supplement to Alternatives A–D	No Change
Rapid City	MSOC RRTP 100 beds	MSOC	MSOC	MSOC RRTP 76 beds	No Change	No Change	No Change

Black Hills Health Care System
Department of Veteran Affairs

*Alternative F— to be determined.
CBOC = Community Based Outpatient Clinic
RRTP = Residential Rehabilitation Treatment Program
MSOC = Multi Specialty Outpatient Clinic

Analysis of Environmental Consequences

Affected Environment

The geographic range of the analysis is determined by the alternatives and may vary by resource, due to the different nature of potential impacts.

For example:

- Potential impacts to aesthetics would be assessed at the locations of specific VA facilities.
- Potential impacts to socioeconomics would be evaluated on a local and regional basis.

The affected environment for each resource will be clearly described in the EIS.

Black Hills Health Care System
Department of Veteran Affairs

The EIS will evaluate the potential impacts of the alternatives on the resources that make up the environment:

Human Environment

- Aesthetics
- Cultural resources
- Noise
- Land use
- Socioeconomics
- Community services
- Solid and hazardous materials
- Transportation and parking
- Utilities
- Environmental justice

Physical Environment

- Air quality
- Floodplains and wetlands
- Geology and soils
- Hydrology and water quality

Biological Environment

- Wildlife and habitat

Other issues for analysis:

- Cumulative impacts
- Controversy
- Unavoidable adverse impacts
- Mitigation and monitoring

Integrating *National Historic Preservation Act* Section 106 Compliance into the NEPA Process

Section 106 of the *National Historic Preservation Act:*

Federal agencies must:

- Identify and assess effects of actions on historic properties
- Avoid, minimize, or mitigate those effects
- Provide the Advisory council on Historic Preservation a reasonable opportunity to comment

Agencies are encouraged to coordinate Section 106 compliance with NEPA.

Federal regulations permit "substitution" of NEPA review for the Section 106 process. Historic properties analysis is integrated into NEPA public involvement, agency coordination, impact analysis, and the agency decision.

Black Hills Health Care System
Department of Veteran Affairs

Notify Consulting Parties and Initiate Consultation

- Secretary of the Interior, State Historic Preservation Officers, Advisory Council on Historic Preservation, Tribal Historic Preservation Officers and other tribal representatives, and other stakeholders.
- Identify/discuss historic preservation issues associated with the Black Hills Health Care System reconfiguration alternatives.

Identify Historic Properties and Traditional Cultural Properties

- Establish areas of potential effect for the EIS alternatives.
- Identify known and potential cultural resources and their status or eligibility for listing on the National Register.
- Document findings as the Affected Environment for cultural resources in the EIS.

Assess Potential Effects

- Evaluate potential impacts to cultural resources using Section 106 criteria.
- With consulting parties, identify measures to avoid, minimize, or mitigate effects on historic properties.
- Document findings in the EIS as part of the Environmental Consequences and Mitigation Measures for cultural resources impacts.

Additional Consultation and Public Involvement

- Provide adequate opportunity for consulting parties' input prior to finalizing the Draft EIS.
- Notify National Park Service of potential effects on the Battle Mountain Sanitarium, a National Historic Landmark.
- Provide ongoing information to the public on the Section 106 process and its integration into the NEPA process.
- Document all Section 106 consultation activities in the EIS and its Administrative Record.

Concluding Section 106 Consultation

- If preferred alternative can potentially affect a historic property, identify mitigation strategy: Memorandum of Agreement, Programmatic Agreement, other binding mitigation commitment made in the VA's Record of Decision.
- Implement the selected alternative and any associated mitigation.

WELCOME
Public Scoping Meeting

VA Black Hills Health Care System Reconfiguration

Meeting Overview

- Purpose of this meeting
- Information on reconfiguration proposal
- Process to prepare Environmental Impact Statement (EIS)
- Integration of historic preservation concerns and tribal consultation
- How to provide comments
- Comments

Meeting Purpose

NEPA and NHPA

- **NEPA – National Environmental Policy Act**
  - **Federal agency *action* or project**
  - **Effects of that action on *human environment***
- **NHPA – National Historic Preservation Act**
  - **Federal agency *undertaking***
  - **Effects of that undertaking on *historic properties***

Scoping

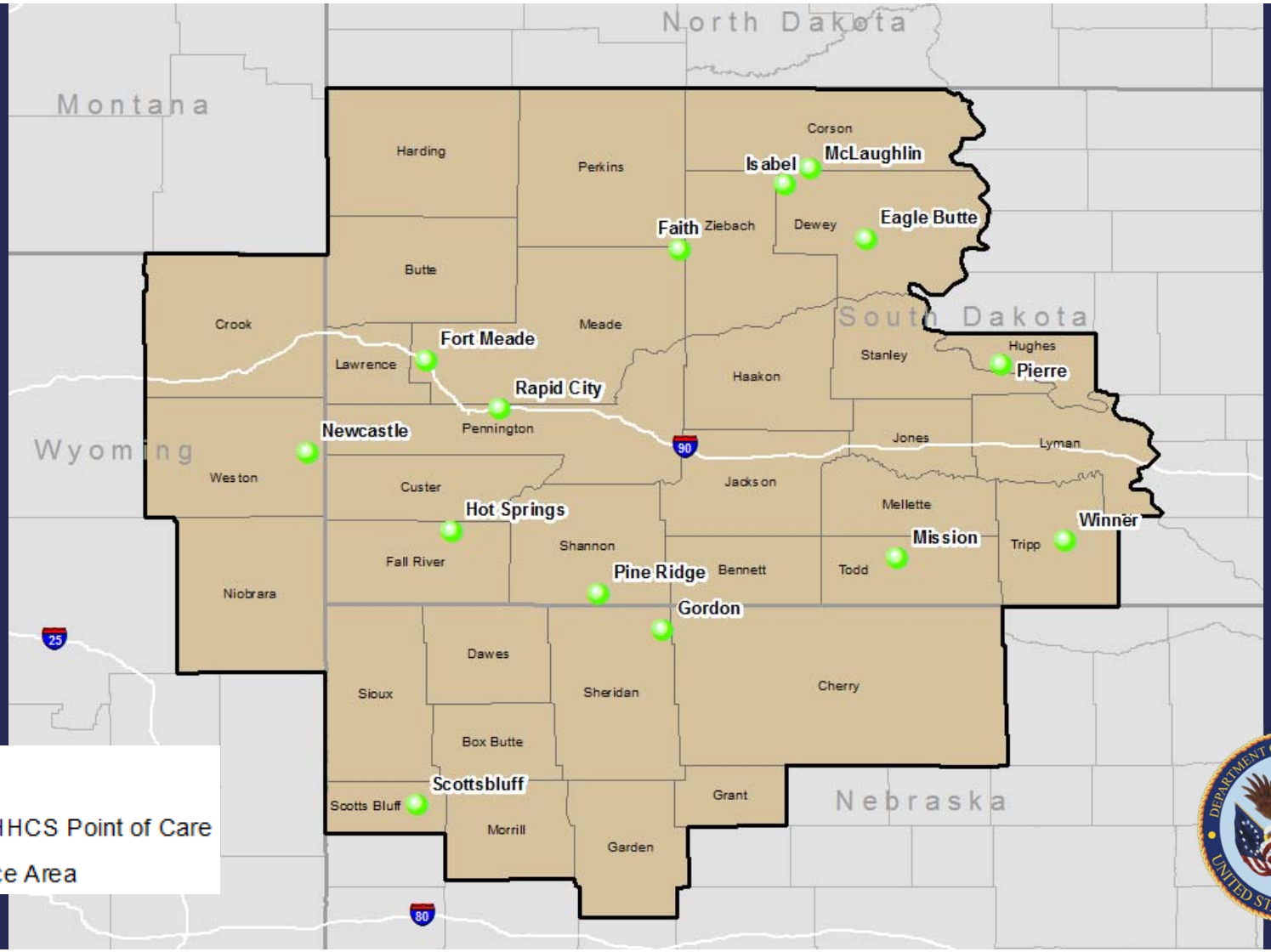
- Initial step in environmental analysis process
- Identify scope of issues related to proposal
- Gather information on resources to be analyzed
- Receive public and agency input on alternatives, impacts, and mitigation

Scoping

- Identify consulting parties
- Use comments to prepare EIS
  - Process questions – provide clarification on NEPA or NHPA
  - Content questions – will be noted and applied to:
    - Refining alternatives
    - Analyzing alternatives
    - Identifying mitigation
  - Comments are not a "vote" for or against the proposal

Reconfiguration Proposal

BH Health Care System



Purpose and Need

- **Purpose for reconfiguration**
  - **Enhance and maintain quality and safety of care**
  - **Replace aging, non-ADA accessible buildings**
  - **Increase access to care closer to Veterans' homes**
  - **Reduce Veterans' travel expenses**

Purpose and Need

- **Need for reconfiguration**
  - **Veteran population centers are not in same location as current VA facilities**
  - **Recruiting and retaining qualified staff at Hot Springs facility**
  - **Maintaining high-quality, safe, and accessible care**
  - **Long distances and travel times to receive specialty care**

Purpose and Need

- **Need for reconfiguration (continued)**
  - **Existing residential treatment facilities limit care available to single parent Veterans and handicapped Veterans, and limit the enhancement of the recovery model of care**
  - **Higher operating costs than financial allocations**

Alternatives

- A, B, and D – build / lease in Hot Springs and Rapid City, vacate Hot Springs VA campus
- C – renovate in Hot Springs and build/ lease in Rapid City
- E – renovate / repurpose Hot Springs VA campus ("Save the VA" alternative)

Alternatives

- F – to be determined
- G – future re-use of Hot Springs VA campus by others (supplement to alternatives A – D)
- H – No Action (status quo)
  - No action must be considered
  - Provides baseline for comparing impacts among alternatives

Location	Alternatives*					
	A	B	C	D	E	H No Action
Hot Springs	CBOC ~~Existing VA Campus~~	CBOC RRTP 100 beds ~~Existing VA Campus~~	CBOC Building 12 Renovation RRTP–100 beds Domiciliary Renovation	CBOC RRTP 24 beds ~~Existing VA Campus~~	Continue inpatient services Building 12 Renovation RRTP–200 beds Domiciliary Renovation Other Upgrades / Renovations New programs & services	No Change
Rapid City	MSOC RRTP 100 beds	MSOC	MSOC	MSOC RRTP 76 beds	No Change	No Change

*Alternative F— to be determined.

* G - future re-use by others of all or part of existing Hot Springs VA campus; supplemental action to Alternatives A-D.

CBOC = Community Based Outpatient Clinic

RRTP = Residential Rehabilitation Treatment Program

MSOC = Multi Specialty Outpatient Clinic

EIS Process

EIS

- Purpose and need for action
- Alternatives
- Affected or baseline environment
  - Ecological and physical features
    - Natural and manmade
  - Social and economic issues
  - Historic properties and cultural values

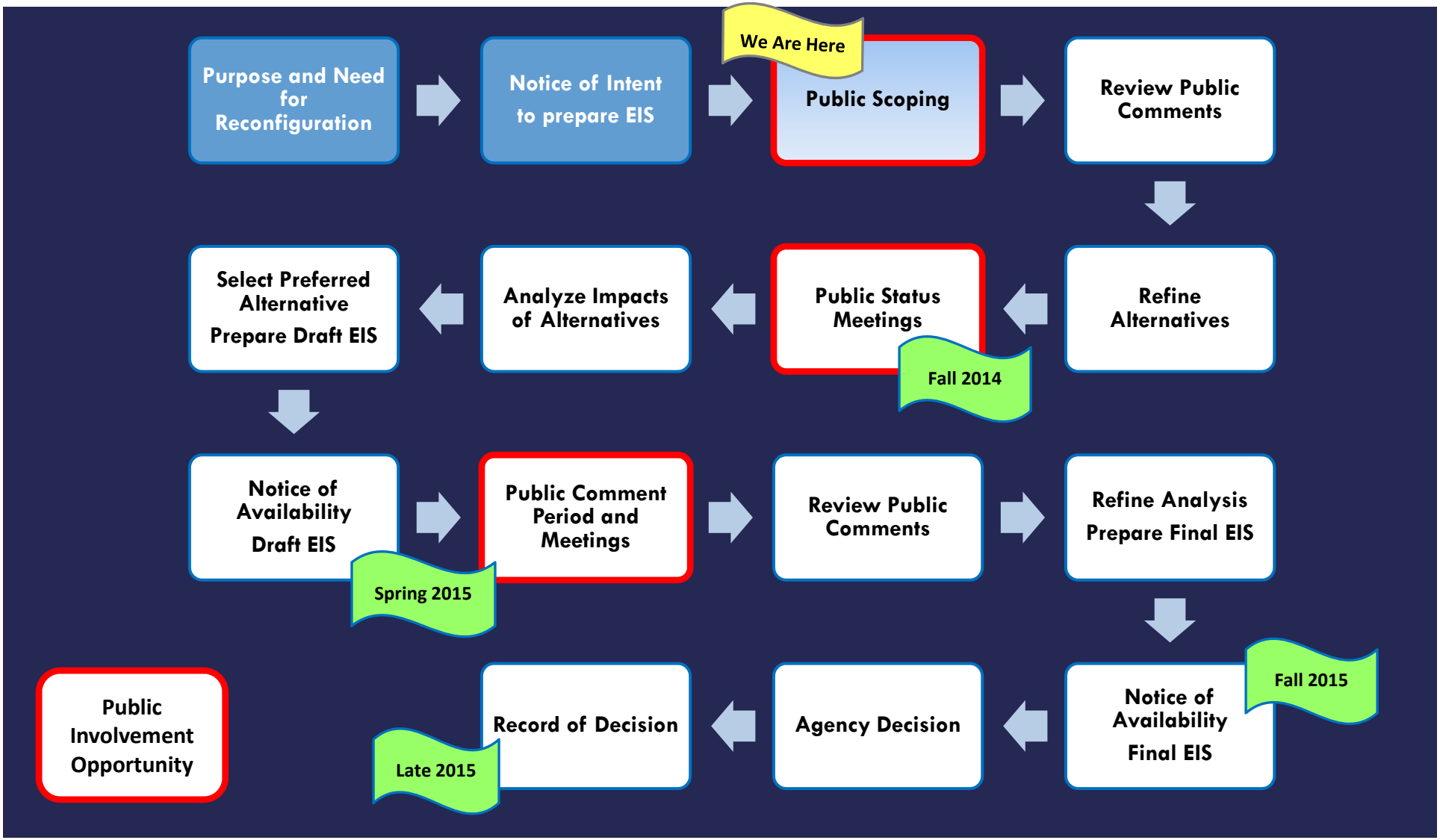
EIS

- Impacts (effects)
  - Direct, indirect, cumulative
  - Adverse, beneficial
- Mitigation
- Public involvement
- Tribal and agency consultations

Impact Evaluation

- Aesthetics
- Air quality
- Cultural resources
- Geology / soils
- Hydrology / water quality
- Wildlife / habitat
- Noise
- Land use
- Floodplain / wetlands
- Socioeconomics
- Community services
- Solid / hazardous materials
- Transportation / parking
- Utilities
- Environmental justice

EIS Process and Schedule



EIS

- **Stay involved and informed**
  - **Now – provide scoping comments**
  - **Later –**
    - **Fall 2014 – status meetings on alternatives and historic properties**
    - **Spring 2015 – public comment period on Draft EIS**
  - **Always – www.blackhills.va.gov/vablackhillsfuture**

NHPA Integration

NHPA Integration

- **Section 106 of NHPA**
  - **Process to determine effects of undertaking on historic properties**
  - **Can be separate process or integrated with NEPA using *substitution***
- **Black Hills EIS: integrated process**
  - **Section 106 proceeds concurrently with EIS**
  - **Identification and evaluation of historic properties documented in EIS**
  - **Enhance opportunities for public participation**

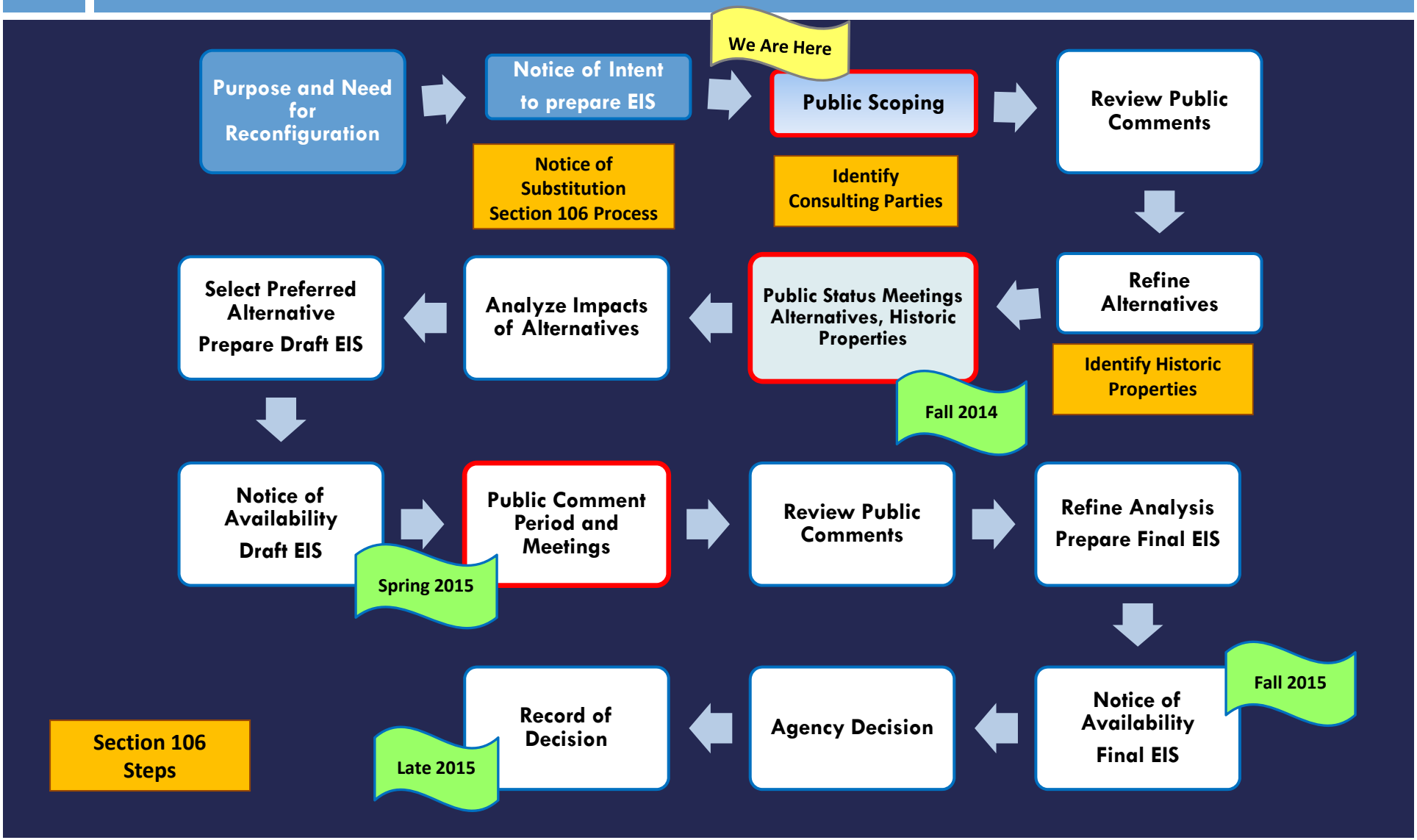
Section 106 Steps

- **Identify consulting parties**
  - **State Historic Preservation Officer (SHPO)**
  - **Tribal Historic Preservation Officer (THPO)**
  - **Native American tribes**
  - **Local governments**
  - **Other individuals and organizations entitled to be consulting parties, determined in consultation with SHPO and THPO**

Section 106 Steps

- Identify historic properties
  - National Historic Landmark
  - Other pre-historic or historic resources
    - Site, building, structure, object, or district
    - Artifacts, records, material remains of properties
  - Traditional religious and cultural importance
  - Included in or eligible for inclusion in National Register of Historic Places
- Seek and consider views of public to inform agency decision-making

Section 106 with EIS



How to Provide Comments

Written Comments

- Complete comment form today
  - Available at entrance table
  - Deposit in basket before leaving
- Mail comment form or letter to:

  Staff Assistant to Director

  VA BHHCS

  113 Comanche Road

  Fort Meade, SD 57741

Written Comments

- **E-mail:**

  vablackhillsfuture@va.gov

- **Internet:**

  www.blackhillseis.com

  (online submission direct to EIS contractor; option to submit anonymously)

  www.regulations.gov

  Docket number: VA-2014-VACO-0002

Submit comments by

August 16, 2014

Verbal Comments

- Use microphone
  - State name and organization if speaking as representative
  - May remain anonymous
- Be considerate of others who would like to speak (there may be time for a second opportunity to speak)
- Provide speaker your full attention (refrain from side conversations, cell phone use)

Comments

- **Requesting your input on:**
  - **Reconfiguration proposal**
  - **Alternatives to consider**
  - **Data and information resources to consider in impact evaluation**
  - **Suggestions to improve environmental analysis**

Send Your Comments

vablackhillsfuture@va.gov

www.blackhillseis.com

www.regulations.gov

Docket number: VA-2014-VACO-0002

Staff Assistant to Director
VA BHHCS
113 Comanche Road
Fort Meade, SD 57741

Thank you for participating!

Appendix E: Consulting Party Identification

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

May 13, 2014

«Courtesy Title» «First Name» «Last Name»
«Job Title»
«Company»
«Address 1»
«City», «State» «Postal Code»

Dear «Courtesy Title» «Last Name»:

Since December 2011, VA Black Hills Health Care System (VA BHHCS) has been engaged in discussions with Veterans and other stakeholders regarding proposed changes in the delivery of high-quality health care for Veterans in the VA BHHCS service area. Many changes have been proposed, but no decisions have been made at this time. VA is now preparing an integrated Environmental Impact Statement (EIS) regarding the proposed reconfiguration in accordance with the National Environmental Policy Act (NEPA). The EIS will include a comprehensive analysis of the potential environmental, cultural and historic, and socioeconomic effects of the proposed reconfiguration of health care services. A contract for EIS support will be utilized to prepare the EIS.

The proposed reconfiguration of VA BHHCS, summarized in Attachment 1, involves changes in how health care is delivered in Hot Springs, SD and the surrounding areas as well as shifting resources to service area population centers. VA BHHCS recognizes that such changes may have an impact on the Hot Springs medical center campus, which is a National Historic Landmark (NHL), as well as a future Rapid City, SD location. In May 2012, VA BHHCS initiated consultation under Sections 106 and 110(f) of the National Historic Preservation Act (NHPA) to consider ways of identifying and avoiding, minimizing, or mitigating such impacts.

EIS/NHPA Support Contractor Selection:

VA has contracted with Labat Environmental, Inc. to support the environmental impact analysis process. Labat Environmental is a multi-disciplinary environmental consulting firm and a Service Disabled Veteran Owned Small Business. They have over 30 years of experience in environmental management, consultation, and compliance and have provided expert environmental and historic preservation support services to many Federal agencies, including VA.

EIS Notice of Intent:

The Notice of Intent (NOI) formally initiating the EIS process will soon be published in the Federal Register. Following publishing of the NOI, VA and Labat Environmental will begin the EIS process with public scoping meetings. The meeting schedule will be posted on our website and notices will be provided to the media.

NEPA/NHPA Integration:

In part because the cultural, historic, and natural environmental elements of the Black Hills area are so interrelated, we have chosen to integrate the NHPA Section 106 consultation procedures into the NEPA environmental impact analysis process using an option formally known as substitution. A more common option is to coordinate the NHPA Section 106 compliance separately but in parallel with the broader NEPA process. However, 36 CFR 800.8(c) of the NHPA grants Federal agencies the latitude to use the substitution option in accordance with the provisions in the Section 106 regulations if they choose. This approach is consistent with the March 2013 report, NEPA and NHPA: A Handbook for Integrating NEPA and Section 106, issued by the Advisory Council on Historic Preservation (ACHP) and Council on Environmental Quality (CEQ). Finally, substituting the NEPA process implements the direction found in Presidential Executive Order 13563, Improving Regulation and Regulatory Review, issued in January 2011.

Reengaging consultation:

VA is now reengaging consultation with all appropriate consulting parties (including the ACHP, National Trust for Historic Preservation, National Park Service, State Historic Preservation Office, Native American Tribes, and federal, state and local governmental officials). It is important to engage in consultation early, in conjunction with the start of the EIS, when a wider range of alternatives is open for consideration.

Your organization was identified as a potential consulting party and invited to participate in May 2012. We want to be sure that we have involved all potential consulting parties; please examine the list of the parties (Attachment 2) that we have identified. If you are aware of additional parties that you believe should be invited to consult, we would appreciate knowing of them.

For your information, the proposed improvements to VA BHHCS as well as information specific to the EIS or Section 106 and 110(f) consultation process can be found online at http://www.blackhills.va.gov/VABlackHillsFuture/.

We welcome your participation in our efforts to identify and consult on potential impacts as well as preserve our National Historic Landmark and other potentially affected historic properties as we prepare for the future of Veteran health care. Additional questions may be directed to Luke Epperson, Administrative Officer to the Office of the Director at vablackhillsfuture@va.gov or 605-720-7170.

Sincerely,

Stephen R. DiStasio
Director

Attachments (2)

Attachment 1

The driving factor that led to the proposals is our need to deliver safe, quality health care. We also want to decrease travel times for Veterans and their family members. We know that in the coming years, the Veteran population in our area will continue to decline. The more prepared we are for the future, the better we can assure the quality and safety of Veteran health care.

Below is a summary of the proposed changes:

- **Opening a new Hot Springs Community Based Outpatient Clinic either co-located with the Fall River Hospital, the State Veterans Home or at a free-standing site.** This VA-staffed clinic would provide the same outpatient care Veterans currently receive, but in a modern, more efficient building for providing health care, primary care, mental health, and limited specialty care. We want to continue to provide dialysis and would like to purchase pharmacy, laboratory and x-ray services at the Fall River Hospital.

- **A phased plan would be implemented to close the VA Hot Springs inpatient and nursing home units, operating rooms, and urgent care facilities.** VA would buy the care from providers in Hot Springs and in your local communities. The goal is to make health care, especially specialty care, more accessible, and save Veterans long-distance travel. VA nurses will be helping manage Veterans' care between VA and non-VA providers.

- **Building a new Residential Rehabilitation Treatment Program facility (also known as the Domiciliary) in Rapid City.** This new structure would be designed to meet modern health care standards and help us better accommodate disabled Veterans, more female Veterans, and Veterans with children. Veterans would benefit from increased access to job training and job sites, state-of-the-art home-like facilities, educational opportunities, housing options following treatment, and other community services. This new facility would allow VA to phase out use of the Hot Springs Domiciliary which is out of compliance with the Americans with Disabilities Act (ADA).

- **Services in Rapid City would be enhanced by expanding the VA Community Based Outpatient Clinic.** Expansion in Rapid City would take care of more Veterans and would also provide x-ray, lab, pharmacy and physical therapy services - allowing VA to provide more services where more Veterans live.

- **Enhance services at the Fort Meade VA Medical Center by building new operating rooms and renovating the inpatient medical/surgical/intensive care units.**

Attachment 2

Potential Consulting Parties
(Listed in alphabetical order)

1) Advisory Council for Historic Preservation Representative
2) AFGE Local 1539 President
3) Area Tribal Leadership Representative
4) Black Hills Historic Preservation Trust Representative
5) City of Hot Springs: Mayor, City Council, Chamber of Commerce Representative
6) Department of the Interior: National Park Service
7) Department of Veterans Affairs: Historic Preservation Office—VISN 23 Midwest Health Care Network—Black Hills Health Care System—Black Hills National Cemetery
8) Fall River County, SD Representatives: Historical Society, County Commissioner and School District
9) Hot Springs CLG Historic Preservation Commission Representative
10) Local "Save the VA" Representative
11) National American Indian Veterans, Inc. Representative
12) National Trust for Historic Preservation Representative
13) Preserve South Dakota Representative
14) South Dakota Historical Society Representative
15) South Dakota - Office of the Governor
16) South Dakota State Historic Preservation Office Representative
17) South Dakota State Legislators—District 30
18) State Veterans Service Organization Leadership Representatives: Nebraska, South Dakota, Wyoming
19) U.S. Senators and Representatives from South Dakota, Nebraska and Wyoming
20) Other attendees of May 31, 2012 consultation meeting

Black Hills Health Care System
Department of Veterans Affairs

FORT MEADE MEDICAL CENTER
113 Comanche Road, Fort Meade, SD 57741-1099

HOT SPRINGS MEDICAL CENTER
500 North 5th Street, Hot Springs, SD 57747-1497

October 9, 2014

«AddressBlock»

RE: Proposed VA Black Hills Health Care System Services Reconfiguration – Section 106 Consultation

«GreetingLine»

The U.S. Department of Veterans Affairs (VA) has proposed to reconfigure the delivery of health care services across the VA Black Hills Health Care System (VA BHHCS) service area. VA is preparing an integrated environmental impact statement (EIS) to evaluate the environmental effects this proposal may have. The EIS will integrate the implementation and review procedures of Section 102 of the *National Environmental Policy Act* (NEPA) with consultation under Section 106 of the *National Historic Preservation Act* (NHPA). The purpose of this letter is to provide an update on the NHPA Section 106 consultation process.

During the EIS scoping period (May 16 to August 16, 2014), comments on a range of issues, including historic resources, were submitted by letter, email, and web-based forms; and in both written and verbal comments at ten public meetings. Attendees at these scoping meetings were invited to submit written requests to the VA to be considered as a consulting party[1] under Section 106 of NHPA. The VA has now developed the following preliminary list of consulting parties with whom consultation on effects to historic properties will be conducted. This list may be modified as consultation proceeds.

Consulting Parties:

- Advisory Council on Historic Preservation
- South Dakota State Historical Society/State Historic Preservation Office
- Wyoming State Historic Preservation Office
- Department of the Interior–National Park Service, Midwest Regional Office
- Fall River County, South Dakota–County Commission
- City of Hot Springs
- National Trust for Historic Preservation
- Save the VA
- Oglala Sioux Tribe
- Northern Arapahoe Tribe
- Kiowa Tribe of Oklahoma

[1] In addition to the state historic preservation officer(s), tribal representatives, local government representatives, additional consulting parties are "Certain individuals and organizations with a demonstrated interest in the undertaking… [who] may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effect on historic properties" (36 CFR 800.2).

- additional tribal governments (follow-up contacts in progress)

In accordance with 36 CFR 800.2(d), the VA is also seeking and considering the views of the public "in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties, confidentiality concerns of private individuals and businesses, and the relationship of the Federal involvement to the undertaking." The 90-day public scoping period provided multiple avenues and opportunities for the public to communicate their views and concerns related to historic properties and cultural resources effects, among other issues. The public will be invited to review the status of the proposal alternatives in late 2014, and comment on the analysis of effects to historic resources from the proposed action and alternatives in the published Draft EIS in 2015. The published Final EIS will address comments on the Draft EIS analysis, with the analysis revised as needed, prior to the VA's decision on this proposal. All recipients of this letter have also been added to the mailing list for the integrated NEPA/Section 106 process, and will receive postcard notification of future public meetings and the availability of the Draft EIS, Final EIS, and Record of Decision.

The VA BHHCS website (www.blackhills.va.gov/VABlackHillsFuture/) has and will continue to provide periodic updates and access to documents throughout this integrated NEPA/Section 106 process. A summary and schedule of the milestones for the integrated NEPA/Section 106 process is attached, for your reference.

If you have any questions regarding the list of consulting parties or concerns about the historic properties consultation process, please send an email to vablackhillsfuture@va.gov, or a letter to Staff Assistant to the Director, VA Black Hills Health Care System, 113 Comanche Road, Fort Meade, SD 57741.

Sincerely,

Stephen R. DiStasio
Director

Attachment (1)

«CC»
«CC1»
«CC2»
«CC3»

INTEGRATING NEPA AND SECTION 106
PROPOSED RECONFIGURATION OF THE VA BLACK HILLS HEALTH CARE SYSTEM
MILESTONES AND SCHEDULE

Note: This schedule is subject to change to allow for availability of participants and unforeseen events, but will be targeted in order to keep the integrated NEPA/106 process on schedule; slippage in dates could affect the schedule for activities that follow.

MILESTONE AND ACTIVITIES	SCHEDULE
Public Scoping and Consulting Party Identification	
Notice of Intent to prepare EIS	5/16/2014
VA letter to stakeholders potentially interested in Section 106 process	5/13/2014
Public scoping meetings	6/11–27/2014
Mailing lists	September 2014
List of potentially affected tribes	8/18/2014
Identify appropriate consulting parties from stakeholders list, requests to participate as a consulting party, and others	September 2014
Contact consulting parties by telephone, email, or written letter to confirm party representative contact information and other logistics	September–October 2014
Tribal Consultations	
VA letter to list of potentially affected tribes inviting their participation in Section 106 consultation process; response requested from tribes within 15 days of receipt of letter	8/18/2014
VA letter with additional Project and consultation information to tribes who accept invitation to participate in Section 106 consultation process	October 2014
Communicate with tribal governments via group or individual emails, teleconferences, and web-based presentations to identify religious and culturally significant properties and potential effects	September–November 2014
Identification of Historic Properties	
Define area(s) of potential effects (APE)	October 2014
Consult with SHPO(s) for concurrence on APE(s)	October 2014
Communicate with consulting parties (including tribal governments) to identify historic properties and potential effects via group emails, teleconferences, and web-based presentations (type and frequency of communication will vary)	October–November 2014
Project Status Meetings	
Notify consulting parties (including tribal governments) and other stakeholders of meeting schedules and locations	2 weeks before meetings
Public meetings to present status of Project alternatives, identified historic properties, and initial assessment of effects	November 2014

MILESTONE AND ACTIVITIES	SCHEDULE
Communicate via group emails, teleconferences, or web-based presentations with consulting parties (including tribal governments) on measures to resolve potential adverse effects to historic properties	October–December 2014
Draft EIS Comment Period	
Notice of Availability of Draft EIS	Spring 2015
Notify consulting parties (including tribal governments) and other stakeholders of schedules and locations for public comment meetings on Draft EIS	Spring 2015
Public meetings on Draft EIS	Spring 2015
Final EIS and Record of Decision	
If necessary, communicate via group emails, teleconferences, or web-based presentations with consulting parties (including tribal governments) for input for resolution of adverse effects of preferred alternative on historic properties in preparing Final EIS	Spring–Summer 2015
If necessary, communicate via group emails, teleconferences, or web-based presentations with consulting parties (including tribal governments) on measures the VA will implement to resolve adverse effects to historic properties in preparing Record of Decision	Fall 2015
Notice of Availability of Final EIS	Fall 2015
If necessary, communicate via group emails, teleconferences, or web-based presentations with consulting parties (including tribal governments) on measures the VA will implement to resolve adverse effects to historic properties in preparing Record of Decision	Fall 2015
Record of Decision	Fall 2015

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