

FINDING OF NO SIGNIFICANT IMPACT

**Seneca Healthcare District Facility Replacement Project
Plumas County, CA**

**Rural Housing Service
U.S. Department of Agriculture**

Seneca Healthcare District

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USDA Rural Development**

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A. INTRODUCTION

Seneca Healthcare District (SHD) plans to submit a financing request to the U.S. Department of Agriculture, Rural Housing Service (RHS) to construct the proposed Hospital Replacement Project (Project) in Plumas County, CA. RHS is considering this financing request. Prior to taking a federal action (i.e., providing financial assistance), RHS is required to complete an environmental impact analysis in accordance with the National Environmental Policy Act of 1969 (NEPA) (U.S.C. 4231 et seq.), the Council on Environmental Quality's (CEQ) regulations for implementing NEPA (40 CFR Parts 1500-1508), and RD's NEPA implementing regulations, Environmental Policies and Procedures (7 CFR Part 1970). After completing an independent analysis of an environmental report prepared by Seneca Healthcare District and its consultant, RUS concurred with its scope and content. In accordance with 7 CFR § 1970.102, RHS adopted the report and issued it as the Agency's Environmental Assessment (EA) for the proposed Project. RHS finds that the EA is consistent with federal regulations and meets the standards for an adequate assessment. Seneca Healthcare District published a newspaper notice, announcing the availability of the EA for public review, in accordance with 7 CFR § 1970.102. In addition, RHS considers the proposed Project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 16 USC 470(f), and its implementing regulation, "Protection of Historic Properties" (36 CFR Part 800).

B. PROJECT DESCRIPTION AND PURPOSE/NEED

The overall purpose of the Project is to construct a new state-of-the-art acute-care hospital, skilled nursing facility, support buildings, employee housing, parking lot, access roads, heliport, and flight path. The new facilities will replace existing aged facilities and expand upon the current services offered by SHD. The final design will integrate address, disaster staging, infrastructure resiliency, and fire-resistant building materials. RHS has reviewed the purpose and need for the Project and determined that the proposal will meet the present and future needs of Seneca Healthcare District.

C. ALTERNATIVES EVALUATED

1. No Action

Under the No Action Alternative, RHS would not provide financial assistance to Seneca Healthcare District, and/or the proposed Project would not be constructed. This alternative would not assist Seneca Healthcare District in providing new state-of-the-art acute-care hospital, skilled nursing facility, support buildings, employee housing, and heliport. The community would have to make do with the existing aged and substandard facilities and the existing capacity limitations.

2. Action Alternative (Preferred Alternative)

Under the Action Alternative, RHS would consider financing the proposed Project, and Seneca Healthcare District would construct Hospital Replacement Project. The proposed project would

construct a new acute-care hospital and skilled nursing facility building to replace SHD's existing aged facilities in Chester, CA.

3. Alternatives Eliminated from Further Consideration

As the project is a less-complex, single-site action and no adverse effects to any environmental resources are anticipated as a result of implementing the proposed project, no further alternatives analysis was required.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The analyses in the EA documented that the proposed Project would have no adverse effects to Land Use, Floodplains, Wetlands, Water Resources, Coastal Resources, Biological Resources, Historic and Cultural Properties, Aesthetics, Air Quality, Socio-Economic Impact Assessment/Environmental Justice, and Human Health and Safety. A summary of anticipated impacts on the human environment is provided below, including any mitigation measures deemed necessary to avoid or minimize impacts. Seneca Healthcare District is responsible for implementing these measures.

1. Land Use – The project site is located adjoined to a commercial corridor flanking State Highway 36 in the unincorporated Town of Chester, CA. Current and surrounding site uses are the existing Seneca Healthcare District's hospital/clinic buildings, residential, hotel, retirement community, and pine forest. The proposed zoning change would replace the existing 7-R, M-R, C-2, Rec-OS, R-10, and Rec-P designations with C-2 (health services and parking lots) and M-R (dwelling units). Once the zoning changes are approved, the project will be consistent with current land uses and zoning designations, and all permitting requirements and ordinances will be complied with.
2. Floodplains – The project site is located in flood zone X, according to FEMA map panel 06063C0175E dated March 2, 2005. The project will have no effect on floodplains, and no flood insurance will be required.
3. Wetlands – A wetland screening investigation was conducted by a specialist for the proposed site. It was determined that a limited amount of wetland habitat was located in the extreme northwestern corner of the project area, and is associated with a linear hydrologic feature mapped as "Stover Ditch". The wetland area itself only extends into the project parcel by approximately 7 feet. Stover Ditch may be considered Waters of the US. Site plans have been designed to fully avoid the wetland, and any waters of the US, potential waters of the US, and associated riparian zones shall be established as environmentally sensitive areas and marked off with fencing as directed by a qualified biologist. Monitoring by biologist will be required for any work near the ESAs. (Mitigation WET-1). Potential indirect effects will be avoided by the implementation of the mandatory Stormwater Pollution Prevention Plan (SWPPP). As the project will fully avoid wetland areas, and prevent indirect effects with the SWPPP, it has been determined that the project will have no effects to wetlands.
4. Water Resources – The project is not within a Sole Source Aquifer area. The project is within the Upper Feather River watershed. As the project is over 1 acre in size, the project will be required to obtain coverage under the Statewide Construction General

Permit (CGP) order 2009-0009-DWQ, administered by the Regional Water Quality Control Board. The CGP is issued by the State Water Resources Control Board (SWRCB) which has been designated by the USEPA to regulate stormwater discharges in compliance with the National Pollutant Discharge Elimination System (NPDES). The CGP requires a number of BMPs in order to prevent construction pollutants from entering storm water runoff. With the implementation of all mitigation and permit requirements, including all Best Management Practices required by the CGP/SWPPP, no impacts to water resources are anticipated.

5. Coastal Resources – This project is not located in a Coastal Zone. There are no Coastal Barrier Resources Act areas in California. There will be no effects to Coastal Resources.
6. Biological Resources – According to an iPac official species list from the U.S. Fish and Wildlife service, there are 12 threatened, endangered, or candidate species with the potential to be in the general project area. Analysis of specific habitat requirements and current and historical occurrences determined that none of the special status plant species and no federally listed or candidate animal species identified in the initial research were likely to occur within the action area due to anthropogenic disturbance, lack of suitable habitat and soil types, and/or lack of known/recent occurrences in the project vicinity. However, floristic surveys were recommended during appropriate blooming periods to prove absence (BIO-1). In addition, even though the Jeffrey pine trees present in the action area are only marginally suitable for bald eagle or osprey nesting, and no nests were observed during previous surveys, pre-construction surveys to determine the presence of nests will be required if the tree and vegetation clearing or construction will begin during migratory bird nesting season (BIO-2b). A list of mitigation measures are included in the EA to ensure construction staff receive awareness training (BIO-2a), that tree/vegetation removal and construction is conducted outside of nesting seasons with pre-removal surveys completed (BIO-2b), and that buffers are installed and consultation initiated with CDFW and/or USFWS (if applicable) should any evidence of species be discovered (BIO-1, 2b & 2c). Based on all available information, USDA RD has determined that this project will have no effect to any federally listed threatened or endangered species or their critical habitat.
7. Historic and Cultural Properties – NHPA S. 106 – In January 2023 an archaeological survey of the project site was performed by PaleoWest. The evaluation also included an archival records search at the Northeast Information Center at CSU Chico, which is part of the California Historical Resources Information System (CHRIS), as well as an intensive archeological pedestrian survey of the APE. The initial pedestrian survey was performed on June 15, 2022, and a supplemental survey on October 3, 2022. Archival search identified one previously-recorded historic site. Site testing within the previously recorded site was completed by PaleoWest archeologists on Nov 29-30, 2022. The work was monitored by tribal representatives from the Susanville Indian Rancheria and the Greenville Rancheria. One item was identified, but no other cultural materials were observed. PaleoWest concluded that no significant archaeological resources were identified on the project site. On November 14, 2022 and March 14, 2023 letters were sent to representatives of the following tribes: Mooretown Rancheria of Maidu Indians, Greenville Rancheria of Maidu Indians, Estom Yumeka Maidu Tribe of the Enterprise Rancheria, Washoe Tribe of Nevada and California, United Auburn Indian Community of the Auburn Rancheria, Susanville Indian Rancheria, and Tsi Akim Maidu. Responses

were received to the initial November letters as follows: The Greenville Rancheria responded requesting a monitor during subsurface testing, which took place in Nov. 2022. The Washoe Tribe responded stating they would defer to the Greenville Rancheria. The United Auburn Indian Community request no curation of artifacts encountered on site, and if resources were found but determined to be not significant, requested that they be reburied in a part of the site away from future disturbance. The former cultural director for the Tsi Akim Maidu responded to state he was no longer cultural director and had no updated contact info, later an administrative assistant responded and stated the tribe was in transition and unable to comment at this time. The Moortown Rancheria responded indicating they were not aware of any known cultural resources in the area, and declined consultation. Following the subsurface testing in Nov 2022, copies of the report were delivered to all tribes listed above, along with a letter requesting concurrence or objection to the recommended finding of No Historic Properties Affected. No responses to the May 2023 recommended finding were received. In June 2022 PaleoWest also completed an architectural history survey of the APE which involved the identification and documentation of 36 buildings in two potential historic districts requiring evaluation for eligibility. Residences on Maywood drive and the original Seneca hospital campus were both evaluationed, and it was concluded that none of the evaluated properties met eligibility criteria for the NRHP. Consultation with the State Historic Preservation Office (SHPO) was initiated March 6, 2023 for concurrence with a proposed No Effect finding, as well as the NRHP eligibility determinations for sites evaluated. SHPO responded via letter on May 3, 2023, in which they concurred with the No Historic Properties Affected finding and that the evaluated properties were ineligible for listing on NRHP either individually or as a historic district. USDA RD has determined a Finding of No Effect to Historic Properties for the Seneca Healthcare District project.

8. Farmland – According to the NRCS Web Soil Survey, none of the soil types present in the project area are classified as prime farmland. CA Farmland Mapping and Monitoring program does not currently have this site, nor any surrounding site, mapped. The nearest mapped farmland is roughly 25 miles from the proposed site. As the project site does not contain any areas designated as important farmland, no further farmland analysis is required. The project will not affect important farmland and will not convert farmland to nonagricultural uses.
9. Noise – Ambient noise at the project areas consists predominantly of rural or natural sounds, and manmade noise from vehicular traffic, residences, local roads, and minimal air traffic from the nearest airport approx.. 1.1 miles away. The new facilities will be immediately adjacent to the existing healthcare facility, so the noise experienced at the new facility will be the same as at the existing one. Short-term and long-term impacts of the project were addressed in the Noise Analysis for the Seneca Hospital Replacement Project. Any construction noise would be temporary. The project will comply with the allowed construction hours stipulated in the Plumas County General Plan Policy 3.1.4. Operational noise will consist of vehicular traffic, which is expected to increase only 6.8% from the existing level of traffic. The helipad would shift existing hospital-related helicopter traffic from the Rogers Field Airport to the area just west of the primary project site. This would introduce new periodic noise to the Project Vicinity. Helicopter transfers have historically averaged 6 to 7 transports per month, and the new helipad would

introduce a comparable number of helicopter trips to the hospital vicinity. The noise experienced at ground level would be elevated for a few minutes per trip. The anticipated helicopter noise levels at the exterior of the nearest residence have been calculated to be 36 dBA, which is less than the sound of a passing car at 50 feet. The periodic helicopter flights would not result in substantial noise levels at neighboring residences, either indoors or outdoors, and the noise levels within the hospital itself will be attenuated to below 45dBA indoors. With flights occurring only 6 or 7 times per month, and takeoff and landing noise lasting only for a few minutes at most each event, the noise impacts will not be significant. No mitigation is required.

10. Aesthetics – The site is located by both natural and residential areas. The project is not located near any scenic highways or roadways, and is not located within any designated scenic area. The project site is located outside the Chester designed review area, and is not subject to its review guidelines, however the 2036 General Plan contains policies that are designed to minimize potential impacts. The project has been designed to avoid the adjacent stream, wetland, and riparian areas, and while some modification is required, the site will not create a significant impact on the forested habitat in the vicinity. New light sources will follow County Code and will focus away from adjoining properties, helipad lighting will be designed to minimize light splash, and the walkway will have motion-sensing lights. Construction and implementation of the project would have no effect to the visual character or quality of the area.
11. Air Quality – The project site is located in an area categorized as attainment for all federal criteria pollutants. Construction will have a minor, temporary, effect on air quality. The project will incorporate all rules and requirements from the state and Northern Sierra Air Quality Management District, including fugitive dust control measures. Minimal emissions would result from operations, generally occurring with a minor increase in vehicular traffic and the operation of a generator during power outage situations. The generator will be subject to a permit with the NSAQMD, and will follow all applicable conditions. With implementation of all pertinent local, regional, and state regulations and rules, and permitting requirements, the construction and operation emissions associated with the project will be insignificant.
12. Socio-Economic Impact Analysis/Environmental Justice – The proposed project will not have effects that would disproportionately affect minority or low-income populations in the area. No Environmental Justice or Civil Rights impacts are likely to result from the implementation of the proposed project.
13. Human Health and Safety – The project site is not located on or near a hazardous materials site. The routine transport, disposal, or use of hazardous materials associated with hospital operations will increase proportionally with the increase in facility capacity. The Plumas County Environmental Health Dept (PCEH) maintains the Hazardous Materials Business Plan and Inventory Program, with which the applicant must remain in compliance. As the project site is within an area designated as a Very High Fire Hazard Severity Zone, the project will be subject to the Wildland Urban Interface Building Standards and will put a Fire Prevention Plan into place (Mitigation HAZ-1). With the implementation of all local, state, and federal laws and regulations, no effects to Human Health and Safety are anticipated.

Summary of Required Mitigation:

- WET-1: Implementation of ESAs and Monitoring for Waters of the United States and Associated Riparian Zones. Prior to Project implementation, with or without Option 1, any waters of the United States, potential waters of the United States, and associated riparian zones shall be established as environmentally sensitive areas (ESAs) and marked off with fencing as directed by a qualified biologist. Monitoring by a qualified biologist shall occur for any required work near the ESAs.
- BIO-1: Floristic Surveys. Appropriately timed surveys for special-status plants shall be conducted in compliance with all CDFW (2018), USFWS (1996), and CNPS (2001) published survey guidelines prior to initiation of work activities. Project (including Option 1) commencement shall not be initiated until special-status plant pre-construction surveys are completed and subsequent mitigation, if necessary, is implemented. If no special-status plant species are found to inhabit the site, no further mitigation measures would be necessary.

If special-status plant species are detected, individuals shall be clearly marked and avoided. If special-status plants detected during focused surveys cannot be avoided, consultation with CDFW and/or USFWS (depending on listing status) shall occur. As part of this consultation, a mitigation plan shall be developed and approved by the appropriate agencies to avoid all adverse impacts. The mitigation plan shall include methodology of transplanting and/or on-site replanting at a 1:1 (mitigation to impacts) ratio, five-year monitoring program, success criteria (e.g., 70% survivorship threshold), and annual reporting requirements. In addition, this plan shall include worker education and development of appropriate avoidance and minimization measures.

- BIO-2a: Environmental Training. Each year prior to the commencement of Project-related activities (including Option 1 activities), a qualified biologist will provide an environmental awareness training program to educate Project personnel on relevant special-status species and their habitats, sensitive/regulated habitats, and applicable environmental laws and permits. The training shall include a description of the species and their habitats, importance of preserving species and habitats, penalties for unauthorized take, and the Project limits.
- BIO-2b: Migratory Birds and Raptors (osprey and bald eagle)/Nest Avoidance. Tree and vegetation clearing (removal, pruning, trimming, and mowing) shall be scheduled to occur outside of the migratory bird nesting season (February 1 through August 31). However, if clearing and/or construction activities will occur during the migratory bird nesting season, then pre-construction surveys to identify active migratory bird and/or raptor nests shall be conducted by a qualified biologist within 14 days of construction initiation on the Project site and within 300 feet (i.e., zone of influence) of Project-related activities. The zone of influence includes areas outside of the Project and Option 1 sites where birds could be disturbed by construction-related noise or earth-moving vibrations. If active nest, roost, or burrow sites are identified within the Project or Option 1 sites, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed Project-related activities to avoid construction or access-related disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which proposed Project-related activities (e.g., vegetation removal, earth moving, and construction) cannot occur. A minimum buffer size of 50 feet for passerines and 300

feet for raptors shall be implemented; sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist. If work is required within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work shall have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

- BIO-2c: Bald Eagle and Golden Eagle. In accordance with the Bald and Golden Eagle Protection Act (BGEPA) (USFWS, last amended 1978), pre-construction surveys for eagles shall be conducted on the Project site and Option 1 site (if applicable) and within 0.5 miles of Project/Option 1 site boundaries. If an active eagle nest is detected within this survey area, the Project proponent shall implement a 0.5-mile no-disturbance buffer around the nest until a qualified biologist determines the nest is no longer active.
- BIO-3: Invasive Species. Vehicles and construction equipment should be inspected prior to entering the project site, and any soil and plant material shall be washed off equipment or vehicle tires and treads prior to entering the site and before leaving site. Any seed and mulch landscaping used during the course of construction shall comply with state regulations.
- HAZ-1: Fire Prevention Plan. To reduce the risk of fire onsite, prior to construction SHD shall prepare a Fire Prevention Plan that includes the following provisions:
 - a) SHD shall use fire resistant vegetation in onsite landscaping.
 - b) Maintenance of the site shall include establishment of defensible space of structures onsite and the inspection of fire suppression equipment such as sprinklers.
 - c) SHD shall coordinate with the Chester Public Utilities District (CPUD) to determine the appropriate amount of water and fire suppression equipment to be kept onsite for fire prevention purposes during project construction and operation.
 - d) SHD and/or its contractors shall have water tanks, water trucks, or portable water backpacks (where space or access for a water truck or water tank is limited) sited/available at the project site for fire protection.
 - e) During construction of the project SHD and/or its contractors shall implement ongoing fire patrols during construction hours and for 1 hour after the end of daily construction and hotwork.
 - f) All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational along the entire length of the approved route to allow communications with other vehicles and construction crews. All fires shall be reported immediately upon detection.
 - g) All internal combustion engines, stationary and mobile, shall be equipped with spark arresters in good working order.
 - h) Light trucks and cars with factory-installed mufflers shall be used only on roads where the roadway is cleared of vegetation.
 - i) Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable material.
 - j) SHD shall prohibit smoking in wildland areas, with smoking limited to paved areas or areas cleared of all vegetation.
 - k) All construction vehicles shall carry fire suppression equipment.

- l) SHD shall ensure that all construction workers receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire.
 - m) As construction may occur simultaneously at several locations, each construction site shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.
 - n) SHD shall instruct construction personnel to park vehicles within roads, road shoulders, graveled areas, and/or cleared areas (i.e., away from dry vegetation) wherever such surfaces are present at the construction site.
 - o) SHD and its contractor shall cease work during Red Flag Warning events in areas where vegetation would be susceptible to accidental ignition by project activities such as welding or use of equipment that could create a spark.
 - p) SHD shall coordinate the finalization of road improvements with CPUD and other emergency responders to ensure that sufficient ingress and egress exists onsite.
- A copy of the Fire Prevention Plan shall be posted at all construction sites and all employees and contractors should be encouraged to sign a statement indicating that they have read and understand the Fire Prevention Plan.

E. PUBLIC AND AGENCY INVOLVEMENT

A local newspaper advertisement [and as appropriate, legal notice], announcing the availability of the EA and participation under Section 106 of the National Historic Preservation Act, was published 7-7-23 through 7-10-2023, in Lassen News, Plumas County, California and Plumas News, Plumas County Ca. A copy of the EA was available for public review at the Seneca Hospital Website, 199 Reynolds Road, Chester Ca. 96020 (Hospital Location), and by request from RD or the applicant. The 14-day comment period ended on 7-21-23. RHS received no comments.

F. FINDING OF NO SIGNIFICANT IMPACT

Based on its EA, RHS has concluded that the proposed Project would have no significant effects to Land Use, Floodplains, Wetlands, Water Resources, Coastal Resources, Biological Resources, Historic and Cultural Properties, Aesthetics, Air Quality, Socio-Economic Impact Assessment/Environmental Justice, and Human Health and Safety. The proposed Project will have no effects on historic properties listed or eligible for listing on the National Register of Historic Places and no effects to federally listed species or designated critical habitat.

The proposed Project would not disproportionately affect minority or low-income populations.

In accordance with the National Environmental Policy Act, as amended (42 U.S.C. 4321 et seq.), the Council on Environmental Quality Regulations (40 CFR 1500–1508), and RD's Environmental Policies and Procedures (7 CFR Part 1970), RHS has determined that the environmental impacts of the proposed Project have been adequately addressed and that no significant impacts to the quality of the human environment would result from construction and operation of the proposed Project. Any final action by RHS related to the proposed Project will be subject to, and contingent upon, compliance with all relevant federal and state environmental laws and regulations. Because RHS's action will not result in significant impacts to the quality of

the human environment, RHS will not prepare an Environmental Impact Statement for its potential federal action associated with the proposed Project.

G. RHS LOAN REVIEW AND RIGHT OF ADMINISTRATIVE REVIEW

This FONSI is not a decision on a loan application and therefore not an approval of the expenditure of federal funds. Issuance of the FONSI and its notices concludes RHS’s environmental review process. The ultimate decision on loan approval depends upon conclusion of this environmental review process in addition to financial and engineering reviews. Issuance of the FONSI and publication of notices will allow for these reviews to proceed. The decision to provide financial assistance also is subject to the availability of loan funds for the designated purpose in RHS’s budget. There are no provisions to appeal this decision (i.e., issuance of a FONSI). Legal challenges to the FONSI may be filed in Federal District Court under the Administrative Procedures Act.

H. APPROVAL

This Finding of No Significant Impact is effective upon signature.

Signature

Lisa Butler
Name

Community Facilities Programs Director
Title

August 9, 2023
Date