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## **APPENDIX A - LIST OF ENVIRONMENTAL PERMITS REQUIRED**

## LIST OF ENVIRONMENTAL PERMITS REQUIRED

### A.1 REGULATORY FRAMEWORK

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and VA's regulations for implementing NEPA (38 CFR Part 26). In addition, the EA has been prepared as prescribed in VA's *NEPA Interim Guidance for Projects* (VA 2010). Federal, state, and local laws and regulations specifically applicable to this Proposed Action are identified, where appropriate, within this EA, and include:

- Coastal Zone Management Act of 1972.
- Endangered Species Act of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Energy Independence Security Act Section 438.
- Executive Order 11988, *Floodplain Management* (24 May 1977).
- Executive Order 11990, *Protection of Wetlands* (24 May 1977).
- Executive Order 12898, *Environmental Justice* (11 February 1994).
- Executive Order 13112, *Invasive Species* (8 February 1999).
- Executive Order 13834, *Efficient Federal Operations* (17 May 2018).
- Farmland Protection Policy Act (7 USC 4201, et seq.)
- Federal Clean Air Act of 1990 (42 USC 7401 et seq., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 et seq.); Sections 401 and 404.
- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Native American Graves Protection and Repatriation Act, as amended (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- Noise Control Act of 1972, Noise Control.
- Texas Administrative Code (TAC) Title 13 (Cultural Resources), Part 2 (Texas Historical Commission on Environmental Quality).
- Texas Administrative Code (TAC) Title 25 (Health Services), Part 1 (Department of State Health Services), Chapter 295 (Occupational Health).
- Texas Administrative Code (TAC) Title 30 (Environmental Quality), Part 1 (Texas Commission on Environmental Quality), Chapter 305 (Consolidated Permits).
- Texas Administrative Code (TAC) Title 30 (Environmental Quality), Part 1 (Texas Commission on Environmental Quality), Chapter 307 (Texas Surface Water Quality Standards).
- Texas Administrative Code (TAC) Title 30 (Environmental Quality), Part 1 (Texas Commission on Environmental Quality), Chapter 308 (Criteria and Standards for the National Pollutant Discharge Elimination System).
- Texas Administrative Code (TAC) Title 30 (Environmental Quality), Part 1 (Texas Commission on Environmental Quality), Chapter 319 (General Regulations Incorporated into Permits).

- Texas Administrative Code (TAC) Title 30 (Environmental Quality), Part 1 (Texas Commission on Environmental Quality), Chapter 327 (Spill Prevention and Control).
- Texas Administrative Code (TAC) Title 30 (Environmental Quality), Part 1 (Texas Commission on Environmental Quality), Chapter 334 (Underground and Aboveground Storage Tanks).
- Texas Administrative Code (TAC) Title 30 (Environmental Quality), Part 1 (Texas Commission on Environmental Quality), Chapter 335 (Industrial Solid Waste and Municipal Hazardous Waste).
- Texas Administrative Code (TAC) Title 31 (Natural Resources and Conservation), Part 1 (General Land Office), Chapter 16 (Coastal Protection).
- Texas Administrative Code (TAC) Title 31 (Natural Resources and Conservation), Part 2 (Texas Parks and Wildlife Department), Chapter 65 (Wildlife).
- Texas Administrative Code (TAC) Title 31 (Natural Resources and Conservation), Part 2 (Texas Parks and Wildlife Department), Chapter 69 (Resource Protection).
- Texas Administrative Code (TAC) Title 43 (Transportation), Part 1 (Texas Department of Transportation).
- Texas Water Code, Section 16.453 (Floodplain Management Account).
- Dallas City Code, Chapter 5A (Air Pollution).
- Dallas City Code, Chapter 19 (Health and Sanitation), Article IX (Stormwater Drainage Systems).
- Dallas City Code, Chapter 30 (Noise).
- Dallas City Code, Chapter 48 (Trees and Shrubs).
- Dallas City Code, Chapter 49 (Water and Wastewater).
- Dallas City Code, Chapter 51A (Dallas Development Code).
- Dallas City Code, Chapter 51A (Dallas Development Code), Article IV (Zoning Regulations).
- Dallas City Code, Chapter 51A (Dallas Development Code), Article V (Floodplain and Escarpment Zone Regulations).
- Dallas City Code, Chapter 51A (Dallas Development Code), Article VI (Environmental Performance Standards).
- Dallas City Code, Chapter 51A (Dallas Development Code), Article X (Landscape and Tree Conservation Regulations).

## **A.2 ENVIRONMENTAL PERMITS REQUIRED**

In addition to the regulatory framework of NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, VA's NEPA regulations (38 CFR Part 26), and VA's *NEPA Interim Guidance for Projects*, the following federal, state, and/or local environmental permits that may be required as part of this Proposed Action include:

- TCEQ Air Permit by Rule Registration
- Texas Pollution Discharge Elimination System (TPDES) Stormwater Permit for Construction Activities
- City of Dallas Stormwater Management Department Service Connection Authorization (required for modifications to existing connection)

- U.S. EPA and Texas Department of State Health Services Asbestos/Demolition Notification Form
- TCEQ registration for new emergency generator ASTs and USTs
- Modification of the existing Dallas VAMC DWU wastewater discharge permit (condition for connection)



## **APPENDIX B – AGENCY CORRESPONDENCE**

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**From:** Elliott, Glenn (CFM) <Glenn.Elliott@va.gov>  
**Sent:** Thursday, July 1, 2021 4:29 PM  
**To:** Polk.Jonna@epa.gov; Eric.Verwers@usace.army.mil; Michael.Brooks@tx.usda.gov; Sonya.Riebock@tceq.texas.gov; tiffany.smith@tceq.texas.gov; Angela.Motloch@tceq.texas.gov; susana.aschkenas@tceq.texas.gov; Connie.Green@tceq.texas.gov; karen.hardin@tpwd.texas.gov; TexasNatural.DiversityDatabase@tpwd.texas.gov; Mo.Bur@txdot.gov; solvera@tsswcb.texas.gov; tbarbee@nctcog.org; communications@trinityra.org; mina.eskander@dallascityhall.com; franklyn.honeycutt@dallascityhall.com; greendallas@dallascityhall.com; john.lawrence@dallascityhall.com; neva.dean@dallascityhall.com; kris.sweckard@dallascityhall.com; sandra.donehoo@dallascityhall.com; StormWater@dallascityhall.com; WaterSpecialtyUnit@dallascityhall.com; amcardle@achp.gov; bkomardley@outlook.com; williamn@comanchenation.com; llangley@mcneese.edu; jbrown@tonkawatribe.com; gary.mcadams@wichitatribe.com; thc@thc.texas.gov; murray.miller@dallascityhall.com; admin@preservationdallas.org; nina\_cooper@fws.gov  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Long-Term Spinal Cord Injury and Clinical Expansion for Mental Health Projects Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Texas  
**Attachments:** NOTICE OF PUBLIC INVOLVEMENT FOR THE PROPOSED LONG-TERM SPINAL CORD INJURY AND CLINICAL EXPANSION FOR MENTAL HEALTH PROJECTS DALLAS VA MEDICAL CENTER.pdf



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

**Date:** July 1, 2021  
**To:** Valued Stakeholders  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Long-Term Spinal Cord Injury and Clinical Expansion for Mental Health Projects Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Texas

The US Department of Veterans Affairs (VA) Office of Construction and Facilities Management is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the Federal decision-making process for proposed construction of Long-Term Spinal Cord Injury (LTSCI) and Clinical Expansion for Mental Health (CEMH) facilities at the VA North Texas Health Care System – Dallas Campus (Dallas VAMC). The location of the Dallas VAMC campus is shown on Figure 1. The existing Dallas VAMC facilities, originally constructed in 1940 and expanded throughout the years, have become antiquated and inadequately sized to provide the modern delivery of health care services currently needed. The proposed LTSCI and CEMH projects would provide larger, state-of-the-art facilities and infrastructure at the Dallas VAMC campus to meet the need for expanded Veteran health care services in the region.

The primary components of the LTSCI project include:

- Construction and operation of an approximately 172,000-square-foot, three to four-story LTSCI facility in the southeastern portion of the campus, adjacent to Building 74.
- Demolition of Buildings 10, 12, and 27 in the northeastern portion of the campus and construction and operation of a new Warehouse/Office building in this area that is approximately 80,000-square-foot in size and two stories tall.
- Temporary construction support areas and utility improvements on and off the Dallas VA campus to accommodate the facility.

The primary components of the CEMH project are anticipated to include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, and TT51 in the north-central portion of the campus and construction and operation of a new CEMH facility in this area that is approximately 215,000-square-foot in size and three to four stories tall.
- Demolition of Buildings 5, 6, 8, 9 and TT49 in the northern portion of the campus, reconfiguration/relocation of the Liberty Loop road and the construction of surface parking lots in this area for the CEMH. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.
- Construction and operation of a new approximately 1,000-car, three to five-story parking garage in the northwestern portion of the campus, in the northern portion a current Dallas VAMC parking lot.
- Temporary construction support areas and utility improvements on and off the Dallas VA campus to accommodate the facility.

Figures 2-4 illustrate the current Dallas VAMC campus configuration and the proposed LTSCI and CEMH project locations.

The LTSCI and CEMH projects would be conducted in phases over a period of 5 or more years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

As part of the decision-making process, VA will undertake an environmental analysis of the proposed action in compliance with the requirements of the National Environmental Policy Act (NEPA). VA is seeking input as part of the scoping process on issues to be addressed during the NEPA analysis, including environmental concerns.

NEPA requires that a Federal agency provide the public with an opportunity to participate in the process of analyzing the impact of Federal actions on the human environment. The purpose of this letter is to notify members of the community and other stakeholders of this opportunity to assist VA in identifying issues, including environmental concerns that may occur as a result of the proposed Federal action. VA will also be initiating consultation under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108 at a future date. VA will be consulting with the State Historic Preservation Office, Tribes, and other consulting parties to identify historic properties that may potentially be affected by the undertaking and to seek ways to avoid, minimize or mitigate for potential adverse effects.

A public scoping comment period will be open through **Tuesday, August 3, 2021**. During this time, agencies and stakeholders are encouraged to submit written comments and input on the proposed action in order to help identify potential issues or concerns for consideration in the NEPA process. Submissions received during the scoping period will be considered in the NEPA analysis.

Due to the on-going COVID-19 pandemic, all submissions should be sent/made via email to [vacoenvironment@va.gov](mailto:vacoenvironment@va.gov) with the subject line "Dallas VAMC LTSCI and CEMH NEPA Scoping." The point of contact for this proposed action is Mr. Bruce Mack, telephone number is (224) 610-7337.

**DALLAS VAMC CAMPUS LOCATION**  
**Proposed LTSCI and CEMH Projects**  
**Dallas VA Medical Center**  
**4500 South Lancaster, Dallas, Texas**





FIGURE 2

**EXISTING DALLAS VAMC CAMPUS CONFIGURATION**  
Proposed LTSCI and CEMH Projects  
Dallas VA Medical Center  
4500 South Lancaster, Dallas, Texas



**FIGURE 3**

**PRELIMINARY LTSCI and CEMH PROJECT SITE PLAN**  
**Proposed LTSCI and CEMH Projects**  
**Dallas VA Medical Center**  
**4500 South Lancaster, Dallas, Texas**

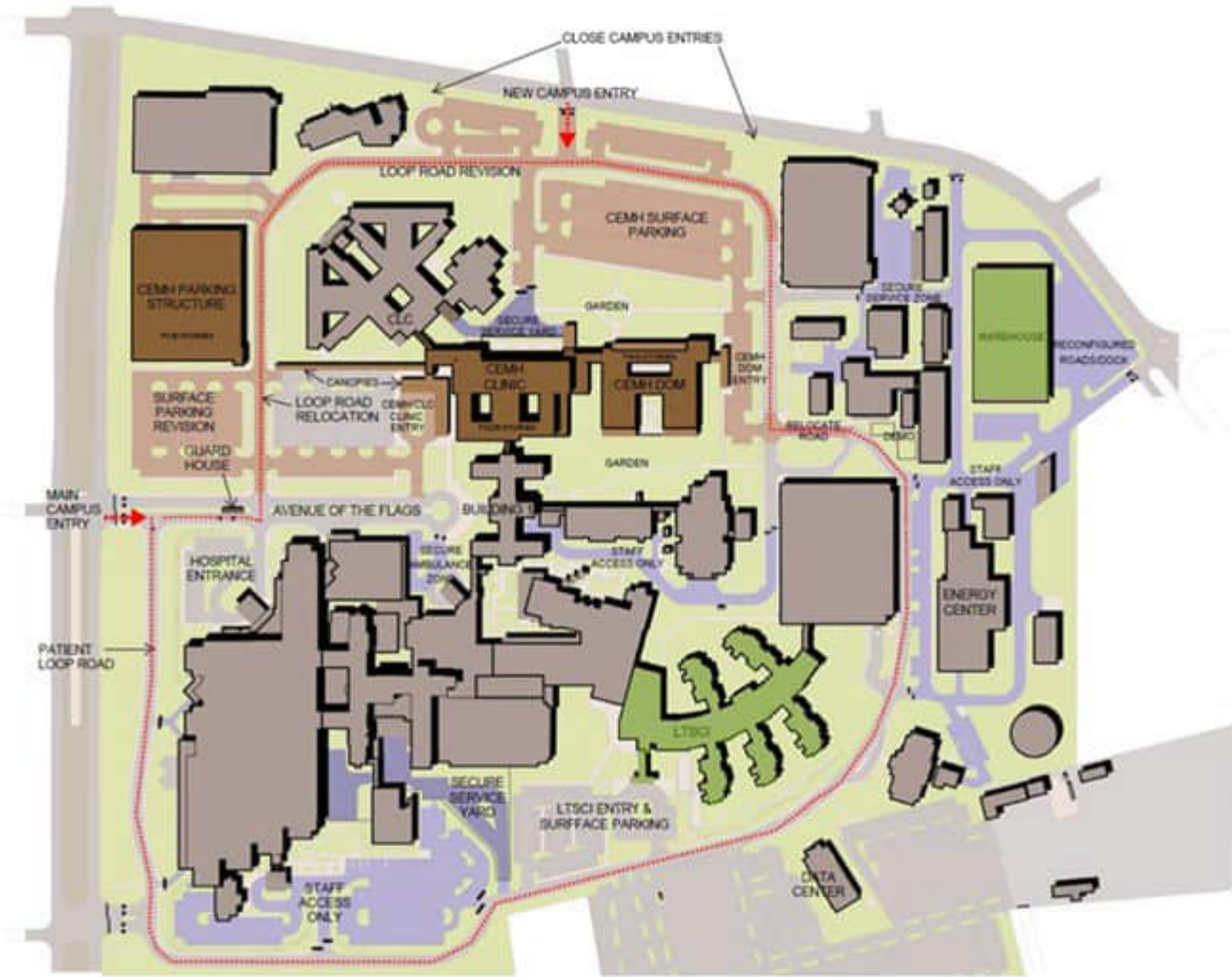
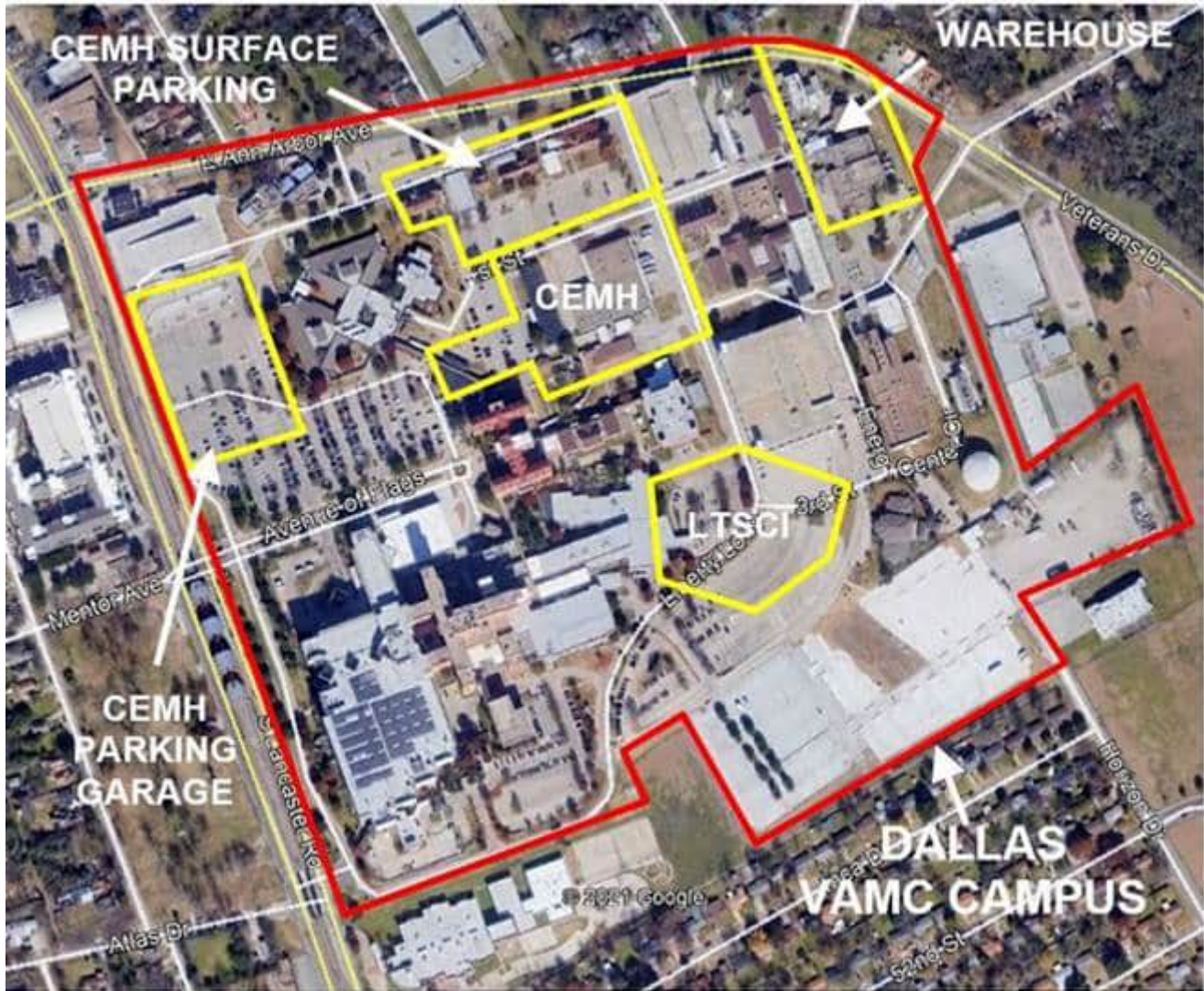




FIGURE 4

**PROPOSED LTSCI and CEMH PROJECT LOCATIONS**

Proposed LTSCI and CEMH Projects  
Dallas VA Medical Center  
4500 South Lancaster, Dallas, Texas



Thank you,  
Glenn

*"Fortitudine Vincimus"* By Endurance We Conquer.

**Glenn Elliott** | Director | Environmental Program Office  
Department of Veterans Affairs | Construction and Facilities Management (CFM)  
a: 425 "I" St. N.W. | Washington D.C. | 20001  
w: 202-632-5879 | c: 202-360-1243 | e: [glenn.elliott@va.gov](mailto:glenn.elliott@va.gov)  
[VA Website](#) | [CFM Website](#) | [Sustainable Design](#) | [TIL](#)

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**U.S. DEPARTMENT OF VETERANS AFFAIRS  
OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT**

**NOTICE OF SCOPING AND PUBLIC INVOLVEMENT  
UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT  
FOR THE PROPOSED  
LONG-TERM SPINAL CORD INJURY AND  
CLINICAL EXPANSION FOR MENTAL HEALTH PROJECTS  
DALLAS VA MEDICAL CENTER  
DALLAS, TEXAS**

The U.S. Department of Veterans Affairs (VA) Office of Construction and Facilities Management is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the Federal decision-making process for the proposed Long-Term Spinal Cord Injury (LTSCI) and Clinical Expansion for Mental Health (CEMH) projects at the VA North Texas Health Care System – Dallas Campus (Dallas VAMC) located at 4500 South Lancaster Road, Dallas, Texas. The proposed LTSCI and CEMH buildings include an approximately 172,000-square-foot LTSCI facility, an approximately 215,000-square-foot CEMH facility, an approximately 80,000-square-foot warehouse/office, and an approximately 1,000-car parking garage. Approximately 14 small to medium-sized, older buildings would be demolished to create space on the campus for the new, larger LTSCI and CEMH buildings.

In accordance with the National Environmental Policy Act (NEPA), VA is seeking the public's input on issues to be addressed during the NEPA process, including environmental concerns that may occur as a result of the proposed Federal action.

A public scoping period is open through **August 3, 2021**. During this time, the public is invited to submit comments on the proposed action and identify potential issues or concerns for consideration in the NEPA process. Due to the on-going COVID 19 pandemic all submissions should be sent/made via email to [vacoenvironment@va.gov](mailto:vacoenvironment@va.gov) with the subject line "Dallas VAMC LTSCI and CEMH NEPA Scoping."

If including your address, phone number, e-mail address, or other personally identifiable information in your comment, please be aware that your entire comment – including your personal identifiable information – may be made publicly available at any time. While you can ask us in your comment to withhold your personally identifiable information from public review, we cannot guarantee that we will be able to do so.



Jon Niermann, *Chairman*  
Emily Lindley, *Commissioner*  
Bobby Janecka, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

July 22, 2021

Glenn Elliott  
Director  
Department of Veteran Affairs  
425 "I" Street N.W.  
Washington D.C.

Via: **E-mail**

Re: **TCEQ NEPA Request #2021-124. CONTRUCTION OF MEDICAL FACILITIES. Dallas County.**

Dear Mr. Elliott,

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments:

In accordance with the general conformity regulations in 40 CFR Part 93, this proposed action was reviewed for air quality impact. The proposed action is located in Dallas County, which is designated nonattainment for the ozone National Ambient Air Quality Standards (NAAQS) with a classification of serious for the 2008 eight-hour ozone NAAQS and a classification of marginal for the 2015 eight-hour ozone NAAQS. General conformity requirements apply for federal actions in Dallas County according to the higher, serious classification.

Volatile organic compounds (VOC) and nitrogen oxides (NOX) are precursor pollutants that lead to the formation of ozone. A general conformity demonstration may be required when the total projected direct and indirect VOC or NOX emissions from an applicable action are equal to or exceed the de minimis emissions level, which is 50 tons per year (tpy) for ozone NAAQS serious nonattainment areas. Based on the information provided to the TCEQ, the emissions from this proposed action are expected to be below the general conformity de minimis threshold and are not anticipated to impact the state implementation plan.

The Office of Water does not anticipate significant long-term environmental impacts from this project as long as construction and waste disposal activities associated with it are completed in accordance with applicable local, state, and federal environmental permits, statutes, and regulations. We recommend that the applicant take necessary steps to ensure that best management practices are used to control runoff from construction sites to prevent detrimental impact to surface and ground water.

Any debris or waste disposal should be at an appropriately authorized disposal facility.

Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA coordinator at (512) 239-0010 or [NEPA@tceq.texas.gov](mailto:NEPA@tceq.texas.gov)

Sincerely,

A handwritten signature in dark ink, appearing to read "Ryan Vise".

Ryan Vise,  
Division Director  
External Relations



Life's better outside.®

July 23, 2021

Mr. Bruce Mack  
U.S. Department of Veterans Affairs  
Office of Construction and Facilities Management  
Washington, DC 20420

Commissioners

Arch "Beaver" Aplin, III  
Chairman  
Lake Jackson

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Wimberley

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Chairman-Emeritus  
Fort Worth

T. Dan Friedkin  
Chairman-Emeritus  
Houston

Carter P. Smith  
Executive Director

RE: Dallas VAMC LTSCI and CEMH NEPA Scoping, Dallas County

Dear Mr. Bruce Mack:

The U.S. Department of Veterans Affairs (VA) proposes the construction of Long-Term Spinal Cord Injury (LTSCI) and Clinical Expansion for Mental Health (CEMH) facilities at the VA North Texas Health Care System – Dallas Campus (Dallas VAMC). The VA provided scoping materials for Texas Parks and Wildlife Department (TPWD) input to assist in identifying potential issues or concerns associated with the proposed action and for consideration during the National Environmental Policy Act (NEPA) process.

The Dallas VAMC is a developed campus in an urban environment with several buildings, roads, parking lots, and associated infrastructure. The proposed construction primarily involves redevelopment of portions of the campus including demolition of existing structures and road reconfigurations to accommodate the new facilities.

As the state agency with primary responsibility for protecting the state's fish and wildlife resources and in accordance with the authority granted by Texas Parks and Wildlife Code (PWC) section 12.0011, TPWD provides the following recommendations to minimize potential adverse impacts to the state's fish and wildlife resources, including threatened and endangered species, in association with the proposed project.

**Federal Regulations - Migratory Bird Treaty Act (MBTA)**

The MBTA prohibits direct and affirmative purposeful actions that reduce migratory birds, their eggs, or their nests, by killing or capturing, to human control, except when specifically authorized by the Department of the Interior. This protection applies to most native bird species, including ground nesting species. The U.S. Fish and Wildlife Service Migratory Bird Office can be contacted at (505) 248-7882 for more information.

Within the project area, potential impacts to migratory birds may occur during disturbance of existing vegetation, structures, and bare ground that may harbor active bird nests, including nests that may occur on structures, in grass, shrubs, and trees, and on bare ground including gravel staging areas.

**Recommendation:** TPWD recommends excluding vegetation clearing activities during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If clearing vegetation during the migratory bird nesting season is unavoidable, TPWD recommends surveying the area proposed for

disturbance to ensure that no nests with eggs or young will be disturbed by construction. If active nests are observed, TPWD recommends a 150-foot disturbance-free buffer until the eggs have hatched and the young have fledged.

Sky glow because of light pollution can have negative impacts on wildlife and ecosystems by disrupting natural diurnal and nocturnal behaviors such as migration, reproduction, nourishment, rest, and cover from predators.

**Recommendation:** As bird protection measures for migrant and resident birds as well as other wildlife, TPWD recommends utilizing the minimum amount of permanent night-time lighting needed for safety and security at the Dallas VAMC and encourages the use of dark sky friendly lighting. TPWD recommends minimizing the project's contribution toward skyglow by focusing light downward, with full cutoff luminaries to avoid light emitting above the horizontal, and to use dark-sky friendly lighting that is on only when needed, down-shielded, as bright as needed, and minimizes blue light emissions. Appropriate lighting technologies, beneficial management practices, and other dark sky resources can be found at the International Dark-Sky Association and McDonald Observatory websites.

#### **State Regulations – PWC Chapter 64, Birds**

PWC section 64.002, regarding protection of nongame birds, provides that no person may catch, kill, injure, pursue, or possess a bird that is not a game bird. PWC section 64.003, regarding destroying nests or eggs, provides that, no person may destroy or take the nests, eggs, or young and any wild game bird, wild bird, or wild fowl. Chapter 64 does not allow for incidental take and therefore is more restrictive than the MBTA.

**Recommendation:** To minimize potential impacts to avian species, please review the *Migratory Bird Treaty Act* section above for recommendations as they are also applicable for compliance with PWC.

#### **State Regulations – PWC Chapter 68 and PWC Chapter 12**

PWC chapter 68 regulates state-listed threatened and endangered animal species. The capture, trap, take, or killing of state-listed threatened and endangered animal species is unlawful unless expressly authorized under a permit issued by USFWS or TPWD.

The TPWD Rare, Threatened, and Endangered Species of Texas (RTEST) is an on-line resource that identifies threatened and endangered species and species of greatest conservation need (SGCN) that have potential to occur within each county in Texas. State-listed species and SGCN could be impacted if suitable habitat is present at or near the project site. TPWD review of the project actions, aerial imagery, and other publicly available data indicate the proposed activities are primarily located within existing developed areas with some development occurring in maintained lawn areas at Dallas VAMC.

**Recommendation:** The TPWD Wildlife Habitat Assessment Program does not anticipate adverse impacts to state-listed threatened or endangered species associated with implementation of the project actions, however, TPWD

recommends the EA identify the state-listed species with potential to occur in Dallas County, identify if suitable habitat occurs within the project action areas, present an assessment of potential impacts, and present beneficial management practices (BMPs) that would be employed to minimize potential impacts.

The Texas Natural Diversity Database (TXNDD) is a database of known occurrences of rare, threatened, and endangered species, sensitive vegetation communities, and animal assemblages that have been reported to TPWD, occur in other public databases, or occur in published reports. The TXNDD intended to assist users in avoiding harm to known locations of rare species or significant ecological features. Given the small proportion of public versus private land in Texas, the TXNDD does not include a representative inventory of rare resources in the state. Please note that absence of information in the database does not imply that a species is absent from that area. Although it is based on the best data available to TPWD regarding rare species, the data from the TXNDD do not provide a definitive statement as to the presence, absence or condition of listed species, SGCN, natural communities, or other significant features within your project area. These data are not inclusive and **cannot be used as presence/absence data**. This information cannot be substituted for on-the-ground surveys. For questions regarding a record or to obtain digital data, please contact [TexasNatural.DiversityDatabase@tpwd.texas.gov](mailto:TexasNatural.DiversityDatabase@tpwd.texas.gov). Specific locations of rare resources may not be known by TPWD or included in the TXNDD; therefore, rare resources may exist where suitable habitat characteristics are present. A TPWD review of the TXNDD did not reveal known records of state-listed species within the project action area.

### **Species of Greatest Conservation Need**

In addition to federal and state threatened and endangered species, TPWD tracks SGCN and natural plant communities and actively promotes their conservation. TPWD considers it important to evaluate and, if feasible, minimize impacts to SGCN and their habitat to reduce the likelihood of endangerment and preclude the need to list as threatened or endangered in the future.

The RTEST list for Dallas County identifies several SGCN amphibians, birds, fish, mammals, reptiles, crustaceans, insects, mollusks, and plants that are of potential occurrence in Dallas County.

**Recommendation:** TPWD recommends taking precautions to avoid impacts to SGCN flora and fauna, natural plant communities, riparian zones, streams, wetlands, native prairie, or special features if discovered in the project area during the site assessment, construction, operation, and maintenance activities.

### **Beneficial Management Practices**

For the protection or benefit of fish and wildlife resources, TPWD recommends the following BMPs for the VA to implement for the proposed project:

1. TPWD recommends a landscaping plan that utilizes native vegetative species. Prairie pockets can provide beneficial habitat for grassland species and pollinators including the American bumble bee (*Bombus pensylvanicus*), an SGCN, as well as

the monarch butterfly, a federal candidate species. TPWD recommends the establishment of pocket prairies at the Dallas VAMC to promote biodiversity and create a beautiful space to be enjoyed by visitors to the campus.

2. TPWD recommends informing employees and contractors of the potential for SGCN to occur in the project area. Contractors should be advised to avoid impacts to all wildlife that are encountered.
3. Wildlife observed during construction should be allowed to safely leave the site or be translocated to a nearby area with similar habitat that would not be disturbed during construction. TPWD recommends that any translocations of reptiles be the minimum distance possible no greater than one mile, preferably within 100-200 yards from the initial encounter location. For purposes of relocation, surveys, monitoring, and research, terrestrial state-listed species may only be handled with authorization through the TPWD Wildlife Permits Office. TPWD recommends that consultants obtain such authorization and serve as on-site biological monitors if encounters of state-listed threatened terrestrial wildlife are likely.
4. Small vertebrates including snakes, lizards, toads, and mice fall into trenches and become trapped. Wildlife unable to escape from trenches are susceptible to loss from backfilling activities, exposure to elements, starvation, dehydration, and predation by other wildlife. If trenching is involved, TPWD recommends minimizing the length of trenches left open at any given time during construction. Trenches left open for more than two daylight hours should be inspected for the presence of trapped wildlife prior to backfilling. If trenches cannot be backfilled the day of initial trenching, then escape ramps, in the form of short lateral trenches or wooden planks sloping to the surface at an angle of less than 45 degrees, should be installed at least every 90 meters.
5. For soil stabilization and revegetation of disturbed areas within the proposed Project area, TPWD recommends erosion and seed/mulch stabilization materials that avoid entanglement hazards to snakes and other wildlife species. Because the mesh found in many erosion control blankets or mats pose an entanglement hazard to wildlife, TPWD recommends the use of no-till drilling, hydromulching and/or hydroseeding rather than erosion control blankets or mats due to a reduced risk to wildlife. If erosion control blankets or mats will be used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Because microplastic pollution is a concern for wildlife food chains, hydromulch containing plastic ingredients and plastic mesh matting should be avoided.
6. To aid in the scientific knowledge of a species' status and current range, TPWD encourages reporting encounters of SGCN, threatened, and endangered species according to the data submittal instructions found on the Texas Natural Diversity Database (TXNDD) website. An alternative method for reporting observations of species is the iNaturalist citizen science app in which plant and animal observations are uploaded from a smartphone. The observer then selects to add the observation to specific TPWD Texas Nature Tracker Projects appropriate for the taxa observed, including Herps of Texas, Birds of Texas, Texas Eagle Nests, Texas Whooper

Bruce Mack  
Page 5  
July 23, 2021

Watch, Mammals of Texas, Rare Plants of Texas, Bees & Wasps of Texas,  
Terrestrial Mollusks of Texas, Texas Freshwater Mussels, Fishes of Texas, and All  
Texas Nature.

Thank you for considering the fish and wildlife resources of Texas. If you have any  
questions, please contact me at Karen.Hardin@tpwd.texas.gov or (903) 322-5001.

Sincerely,

A handwritten signature in black ink that reads "Karen B. Hardin". The signature is fluid and cursive, with the first name "Karen" and last name "Hardin" clearly legible.

Karen B. Hardin  
Wildlife Habitat Assessment Program  
Wildlife Division

kbh/46969

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**Subject:** RE: Notice of Scoping and Stakeholder Involvement for the Proposed Long-Term Spinal Cord Injury and Clinical Expansion for Mental Health Projects Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Texas

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**From:** Elliott, Glenn (CFM) <[Glenn.Elliott@va.gov](mailto:Glenn.Elliott@va.gov)>

**Sent:** Wednesday, July 7, 2021 5:56 AM

**To:** Mack, Bruce G. (CFM) <[Bruce.Mack@va.gov](mailto:Bruce.Mack@va.gov)>

**Subject:** Fwd: Notice of Scoping and Stakeholder Involvement for the Proposed Long-Term Spinal Cord Injury and Clinical Expansion for Mental Health Projects Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Texas

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**From:** Texas Natural Diversity Database <[TexasNatural.DiversityDatabase@tpwd.texas.gov](mailto:TexasNatural.DiversityDatabase@tpwd.texas.gov)>

**Sent:** Tuesday, July 6, 2021 5:01:20 PM

**To:** Elliott, Glenn (CFM) <[Glenn.Elliott@va.gov](mailto:Glenn.Elliott@va.gov)>; [Polk.Jonna@epa.gov](mailto:Polk.Jonna@epa.gov) <[Polk.Jonna@epa.gov](mailto:Polk.Jonna@epa.gov)>; [Eric.Verwers@usace.army.mil](mailto:Eric.Verwers@usace.army.mil) <[Eric.Verwers@usace.army.mil](mailto:Eric.Verwers@usace.army.mil)>; [Michael.Brooks@tx.usda.gov](mailto:Michael.Brooks@tx.usda.gov) <[Michael.Brooks@tx.usda.gov](mailto:Michael.Brooks@tx.usda.gov)>; [Sonya.Riebock@tceq.texas.gov](mailto:Sonya.Riebock@tceq.texas.gov) <[Sonya.Riebock@tceq.texas.gov](mailto:Sonya.Riebock@tceq.texas.gov)>; [tiffany.smith@tceq.texas.gov](mailto:tiffany.smith@tceq.texas.gov) <[tiffany.smith@tceq.texas.gov](mailto:tiffany.smith@tceq.texas.gov)>; [Angela.Motloch@tceq.texas.gov](mailto:Angela.Motloch@tceq.texas.gov) <[Angela.Motloch@tceq.texas.gov](mailto:Angela.Motloch@tceq.texas.gov)>; [susana.aschkenas@tceq.texas.gov](mailto:susana.aschkenas@tceq.texas.gov) <[susana.aschkenas@tceq.texas.gov](mailto:susana.aschkenas@tceq.texas.gov)>; [Connie.Green@tceq.texas.gov](mailto:Connie.Green@tceq.texas.gov) <[Connie.Green@tceq.texas.gov](mailto:Connie.Green@tceq.texas.gov)>; Karen Hardin <[Karen.Hardin@tpwd.texas.gov](mailto:Karen.Hardin@tpwd.texas.gov)>; [Mo.Bur@txdot.gov](mailto:Mo.Bur@txdot.gov) <[Mo.Bur@txdot.gov](mailto:Mo.Bur@txdot.gov)>; [solvera@tsswcb.texas.gov](mailto:solvera@tsswcb.texas.gov) <[solvera@tsswcb.texas.gov](mailto:solvera@tsswcb.texas.gov)>; [tbarbee@nctcog.org](mailto:tbarbee@nctcog.org) <[tbarbee@nctcog.org](mailto:tbarbee@nctcog.org)>; [communications@trinityra.org](mailto:communications@trinityra.org) <[communications@trinityra.org](mailto:communications@trinityra.org)>; [mina.eskander@dallascityhall.com](mailto:mina.eskander@dallascityhall.com) <[mina.eskander@dallascityhall.com](mailto:mina.eskander@dallascityhall.com)>; [franklyn.honeycutt@dallascityhall.com](mailto:franklyn.honeycutt@dallascityhall.com) <[franklyn.honeycutt@dallascityhall.com](mailto:franklyn.honeycutt@dallascityhall.com)>; [greendallas@dallascityhall.com](mailto:greendallas@dallascityhall.com) <[greendallas@dallascityhall.com](mailto:greendallas@dallascityhall.com)>; [john.lawrence@dallascityhall.com](mailto:john.lawrence@dallascityhall.com) <[john.lawrence@dallascityhall.com](mailto:john.lawrence@dallascityhall.com)>; [neva.dean@dallascityhall.com](mailto:neva.dean@dallascityhall.com) <[neva.dean@dallascityhall.com](mailto:neva.dean@dallascityhall.com)>; [kris.sweckard@dallascityhall.com](mailto:kris.sweckard@dallascityhall.com) <[kris.sweckard@dallascityhall.com](mailto:kris.sweckard@dallascityhall.com)>; [sandra.donehoo@dallascityhall.com](mailto:sandra.donehoo@dallascityhall.com) <[sandra.donehoo@dallascityhall.com](mailto:sandra.donehoo@dallascityhall.com)>; [StormWater@dallascityhall.com](mailto:StormWater@dallascityhall.com) <[StormWater@dallascityhall.com](mailto:StormWater@dallascityhall.com)>; [WaterSpecialtyUnit@dallascityhall.com](mailto:WaterSpecialtyUnit@dallascityhall.com) <[WaterSpecialtyUnit@dallascityhall.com](mailto:WaterSpecialtyUnit@dallascityhall.com)>; [amcardle@achp.gov](mailto:amcardle@achp.gov) <[amcardle@achp.gov](mailto:amcardle@achp.gov)>; [bkomardley@outlook.com](mailto:bkomardley@outlook.com) <[bkomardley@outlook.com](mailto:bkomardley@outlook.com)>; [williamn@comanchenation.com](mailto:williamn@comanchenation.com) <[williamn@comanchenation.com](mailto:williamn@comanchenation.com)>; [llangley@mcneese.edu](mailto:llangley@mcneese.edu) <[llangley@mcneese.edu](mailto:llangley@mcneese.edu)>; [jbrown@tonkawatribe.com](mailto:jbrown@tonkawatribe.com) <[jbrown@tonkawatribe.com](mailto:jbrown@tonkawatribe.com)>; [gary.mcadams@wichitatribe.com](mailto:gary.mcadams@wichitatribe.com) <[gary.mcadams@wichitatribe.com](mailto:gary.mcadams@wichitatribe.com)>; [thc@thc.texas.gov](mailto:thc@thc.texas.gov) <[thc@thc.texas.gov](mailto:thc@thc.texas.gov)>; [murray.miller@dallascityhall.com](mailto:murray.miller@dallascityhall.com) <[murray.miller@dallascityhall.com](mailto:murray.miller@dallascityhall.com)>; [admin@preservationdallas.org](mailto:admin@preservationdallas.org) <[admin@preservationdallas.org](mailto:admin@preservationdallas.org)>; [nina\\_cooper@fws.gov](mailto:nina_cooper@fws.gov) <[nina\\_cooper@fws.gov](mailto:nina_cooper@fws.gov)>

**Subject:** [EXTERNAL] RE: Notice of Scoping and Stakeholder Involvement for the Proposed Long-Term Spinal Cord Injury and Clinical Expansion for Mental Health Projects Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Texas

Hello Glenn -

The Texas Natural Diversity Database (TXNDD) staff would like to announce the availability of the TXNDD Information Request Tool (IRT); an online application created through ArcGIS Online. The IRT will allow users on-demand access to TXNDD data for download. If you are interested in using the IRT please follow this [link](#) to determine if you or your organization meet the minimum user requirements. For those that cannot or choose not to use the IRT, TXNDD staff will continue to accept and process email information requests as per usual.

The Texas Natural Diversity Database (TXNDD) staff provides the following information in response to your request for data. Included are data for a 10-mile radius around the Area of Interest for the Dallas VA Medical Center, 4500



**South Lancaster Road, Dallas, Texas campus only.** Please read this entire message for important information regarding your request, additional data sources, and project review.

As of June 1, 2019, each information request **may** contain additional spatial and report information. Be aware of files labeled in the following format (sfpt\_(requestor\_name)\_yyyymmdd.zip, sfln\_(requestor\_name)\_yyyymmdd.zip, or sfpy\_(requestor\_name)\_yyyymmdd.zip). The additional files contain Source Features (observations) of tracked species or communities that haven't been added to an Element Occurrence (EO) record yet. You may also see reports that have file names starting with sf. All data, regardless of the record being an Element Occurrence (EO) or Source Feature (SF) should be considered when evaluating the impact of any project. If you have any questions about Source Feature data or how to use that information, please contact Bob Gottfried at (512)389-8744.

### Data

The [TXNDD](#) includes federal and state listed and tracked Threatened, Endangered, and Rare species. Please note that **areas where Element Occurrence (EO) data are absent should not be interpreted as an absence of Threatened, Endangered, and Rare species.** *Given the small proportion of public versus private land in Texas, the TXNDD does not include a representative inventory of rare resources in the state. Data from the TXNDD do not provide a definitive statement as to the presence, absence, or condition of special species, natural communities, or other significant features within your project area. These data cannot substitute for an on-site evaluation by qualified biologists.*

### Attached documents

The attached .zip file contains several documents that will guide you in appropriate use, restrictions, and interpretation of TXNDD data as well as a reporting form for submitting data to the TXNDD. The .zip file also includes additional supplemental documents. Below is a list of the files in the attached folder:

- **Shapefiles** (eo\_[last name of requestor]\_yyyymmdd.zip, sfpt\_[last name of requestor]\_yyyymmdd.zip, sfln\_[last name of requestor]\_yyyymmdd.zip, sfpy\_[last name of requestor]\_yyyymmdd.zip) of the Threatened, Endangered and Rare species Element Occurrences and Source Features made from information the TXNDD presently has available for the requested quad(s) (or within the requested county, by requested species when applicable). Not all responses will contain each shapefile depending on the data available in the requested area.
- **EO Report** (eoreport\_[last name of requestor]\_yyyymmdd.pdf) of the EOs in the shapefile mentioned above. The **EO Report** includes more detailed information about each EO than what is contained in the attribute table of the shapefile. Link the information in the shapefile to the information in the **EO Report** by *EO ID*. Note that if the number of records in your request area is large, this report may not be included; however, if, in this circumstance, you would like more detailed information about a particular EO, species, or smaller geographic area, you may request those data.
- **SF Report** (sfreport\_[last name of requestor]\_yyyymmdd.pdf) of the *Source Features* in the shapefile mentioned above. The **SF Report** includes more detailed information about each Source Feature than what is contained in the attribute table of the shapefile. Link the information in the shapefile to the information in the **SF Report** by *Source Feature ID*. Note that if the number of records in your request area is large, this report may not be included; however, if, in this circumstance, you would like more detailed information about a particular Source Feature, species, or smaller geographic area, you may request those data.
- **County List FAQ** (County\_lists\_FAQ\_20150415.pdf) produced by the Wildlife Habitat Assessment Program.
- **TXNDD Information** document (txndd\_information.pdf) that includes a background of the TXNDD, a description of past and current spatial methodology employed, and an explanation of interpretation of the data. Global and subnational (state) conservation ranks are also explained in this document as are the shapefile attributes and EO report sections.
- **TXNDD Reporting Form** (txndd\_reporting\_form.doc) for reporting observations of tracked elements to the Texas Natural Diversity Database. To submit data, fill out this form and send it to [TexasNatural.DiversityDatabase@tpwd.texas.gov](mailto:TexasNatural.DiversityDatabase@tpwd.texas.gov). Note that you can also submit data in the form of an Excel spreadsheet or written report.



### **Project Review, Rare Species County Lists, Project Planning, and BMPs**

This email cannot substitute for an environmental review of your project by TPWD. For information on project review and to access the county lists of protected species and species of greatest conservation need with potential to occur in the county, please visit the Wildlife Habitat Assessment (WHAB) website at [http://tpwd.texas.gov/huntwild/wild/wildlife\\_diversity/habitat\\_assessment/](http://tpwd.texas.gov/huntwild/wild/wildlife_diversity/habitat_assessment/). The WHAB website includes several resources to consider while planning your project to minimize impacts to fish and wildlife resources, including information /guidelines on Wind Energy projects, Transmission Line projects, Communication Towers, and Karst Zones (Travis, Williamson, and Bexar Counties).

### **Ecologically Significant Stream Segments**

If your information request area contains known ecologically significant stream segments, the data can be obtained by contacting Albert El-Hage ([Albert.El-Hage@tpwd.texas.gov](mailto:Albert.El-Hage@tpwd.texas.gov)).

### **Critical Habitat**

If your information request area contains federally designated critical habitat, the data can be obtained at <http://ecos.fws.gov/crithab/>.

### **TPWD Managed Areas**

We are no longer providing Managed Area shapefiles and associated Managed Area Reports. To obtain shapefiles for Wildlife Management Areas and State Park Boundaries, please visit the Texas Parks and Wildlife Department GIS Data Download page (<https://tpwd.texas.gov/gis/>).

Sincerely,

*The Texas Natural Diversity Database*

---

**From:** Elliott, Glenn (CFM) <[Glenn.Elliott@va.gov](mailto:Glenn.Elliott@va.gov)>

**Sent:** Thursday, July 1, 2021 3:29 PM

**To:** [Polk.Jonna@epa.gov](mailto:Polk.Jonna@epa.gov); [Eric.Verwers@usace.army.mil](mailto:Eric.Verwers@usace.army.mil); [Michael.Brooks@tx.usda.gov](mailto:Michael.Brooks@tx.usda.gov); [Sonya.Riebock@tceq.texas.gov](mailto:Sonya.Riebock@tceq.texas.gov); [tiffany.smith@tceq.texas.gov](mailto:tiffany.smith@tceq.texas.gov); [Angela.Motloch@tceq.texas.gov](mailto:Angela.Motloch@tceq.texas.gov); [susana.aschkenas@tceq.texas.gov](mailto:susana.aschkenas@tceq.texas.gov); [Connie.Green@tceq.texas.gov](mailto:Connie.Green@tceq.texas.gov); Karen Hardin <[Karen.Hardin@tpwd.texas.gov](mailto:Karen.Hardin@tpwd.texas.gov)>; Texas Natural Diversity Database <[TexasNatural.DiversityDatabase@tpwd.texas.gov](mailto:TexasNatural.DiversityDatabase@tpwd.texas.gov)>; [Mo.Bur@txdot.gov](mailto:Mo.Bur@txdot.gov); [solvera@tsswcb.texas.gov](mailto:solvera@tsswcb.texas.gov); [tbarbee@nctcog.org](mailto:tbarbee@nctcog.org); [communications@trinityra.org](mailto:communications@trinityra.org); [mina.eskander@dallascityhall.com](mailto:mina.eskander@dallascityhall.com); [franklyn.honeycutt@dallascityhall.com](mailto:franklyn.honeycutt@dallascityhall.com); [greendallas@dallascityhall.com](mailto:greendallas@dallascityhall.com); [john.lawrence@dallascityhall.com](mailto:john.lawrence@dallascityhall.com); [neva.dean@dallascityhall.com](mailto:neva.dean@dallascityhall.com); [kris.sweckard@dallascityhall.com](mailto:kris.sweckard@dallascityhall.com); [sandra.donehoo@dallascityhall.com](mailto:sandra.donehoo@dallascityhall.com); [StormWater@dallascityhall.com](mailto:StormWater@dallascityhall.com); [WaterSpecialtyUnit@dallascityhall.com](mailto:WaterSpecialtyUnit@dallascityhall.com); [amcardle@achp.gov](mailto:amcardle@achp.gov); [bkomardley@outlook.com](mailto:bkomardley@outlook.com); [williamn@comanchenation.com](mailto:williamn@comanchenation.com); [llangleymc@mcneese.edu](mailto:llangleymc@mcneese.edu); [jbrown@tonkawatribe.com](mailto:jbrown@tonkawatribe.com); [gary.mcadams@wichitatribe.com](mailto:gary.mcadams@wichitatribe.com); [thc@thc.texas.gov](mailto:thc@thc.texas.gov); [murray.miller@dallascityhall.com](mailto:murray.miller@dallascityhall.com); [admin@preservationdallas.org](mailto:admin@preservationdallas.org); [nina\\_cooper@fws.gov](mailto:nina_cooper@fws.gov)

**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Long-Term Spinal Cord Injury and Clinical Expansion for Mental Health Projects Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Texas



**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

**Date:** July 1, 2021

**To:** Valued Stakeholders

**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Long-Term Spinal Cord Injury and Clinical Expansion for Mental Health Projects Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Texas

The US Department of Veterans Affairs (VA) Office of Construction and Facilities Management is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the Federal decision-making process for proposed construction of Long-Term Spinal Cord Injury (LTSCI) and Clinical Expansion for Mental Health (CEMH) facilities at the VA North Texas Health Care System – Dallas Campus (Dallas VAMC). The location of the Dallas VAMC campus is shown on Figure 1. The existing Dallas VAMC facilities, originally constructed in 1940 and expanded throughout the years, have become antiquated and inadequately sized to provide the modern delivery of health care services currently needed. The proposed LTSCI and CEMH projects would provide larger, state-of-the-art facilities and infrastructure at the Dallas VAMC campus to meet the need for expanded Veteran health care services in the region.

The primary components of the LTSCI project include:

- Construction and operation of an approximately 172,000-square-foot, three to four-story LTSCI facility in the southeastern portion of the campus, adjacent to Building 74.
- Demolition of Buildings 10, 12, and 27 in the northeastern portion of the campus and construction and operation of a new Warehouse/Office building in this area that is approximately 80,000-square-foot in size and two stories tall.
- Temporary construction support areas and utility improvements on and off the Dallas VA campus to accommodate the facility.

The primary components of the CEMH project are anticipated to include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, and TT51 in the north-central portion of the campus and construction and operation of a new CEMH facility in this area that is approximately 215,000-square-foot in size and three to four stories tall.
- Demolition of Buildings 5, 6, 8, 9 and TT49 in the northern portion of the campus, reconfiguration/relocation of the Liberty Loop road and the construction of surface parking lots in this area for the CEMH. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.
- Construction and operation of a new approximately 1,000-car, three to five-story parking garage in the northwestern portion of the campus, in the northern portion a current Dallas VAMC parking lot.
- Temporary construction support areas and utility improvements on and off the Dallas VA campus to accommodate the facility.

Figures 2-4 illustrate the current Dallas VAMC campus configuration and the proposed LTSCI and CEMH project locations.

The LTSCI and CEMH projects would be conducted in phases over a period of 5 or more years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

As part of the decision-making process, VA will undertake an environmental analysis of the proposed action in compliance with the requirements of the National Environmental Policy Act (NEPA). VA is seeking input as part of the scoping process on issues to be addressed during the NEPA analysis, including environmental concerns.

NEPA requires that a Federal agency provide the public with an opportunity to participate in the process of analyzing the impact of Federal actions on the human environment. The purpose of this letter is to notify members of the community and other stakeholders of this opportunity to assist VA in identifying issues, including environmental concerns that may occur as a result of the proposed Federal action. VA will also be initiating consultation under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108 at a future date. VA will be consulting with the State Historic Preservation Office, Tribes, and other consulting parties to identify historic properties that may potentially be affected by the undertaking and to seek ways to avoid, minimize or mitigate for potential adverse effects.

A public scoping comment period will be open through **Tuesday, August 3, 2021**. During this time, agencies and stakeholders are encouraged to submit written comments and input on the proposed action in order to help identify potential issues or concerns for consideration in the NEPA process. Submissions received during the scoping period will be considered in the NEPA analysis.

Due to the on-going COVID-19 pandemic, all submissions should be sent/made via email to [vacoenvironment@va.gov](mailto:vacoenvironment@va.gov) with the subject line "Dallas VAMC LTSCI and CEMH NEPA Scoping." The point of contact for this proposed action is Mr. Bruce Mack, telephone number is (224) 610-7337.

**FIGURE 1**

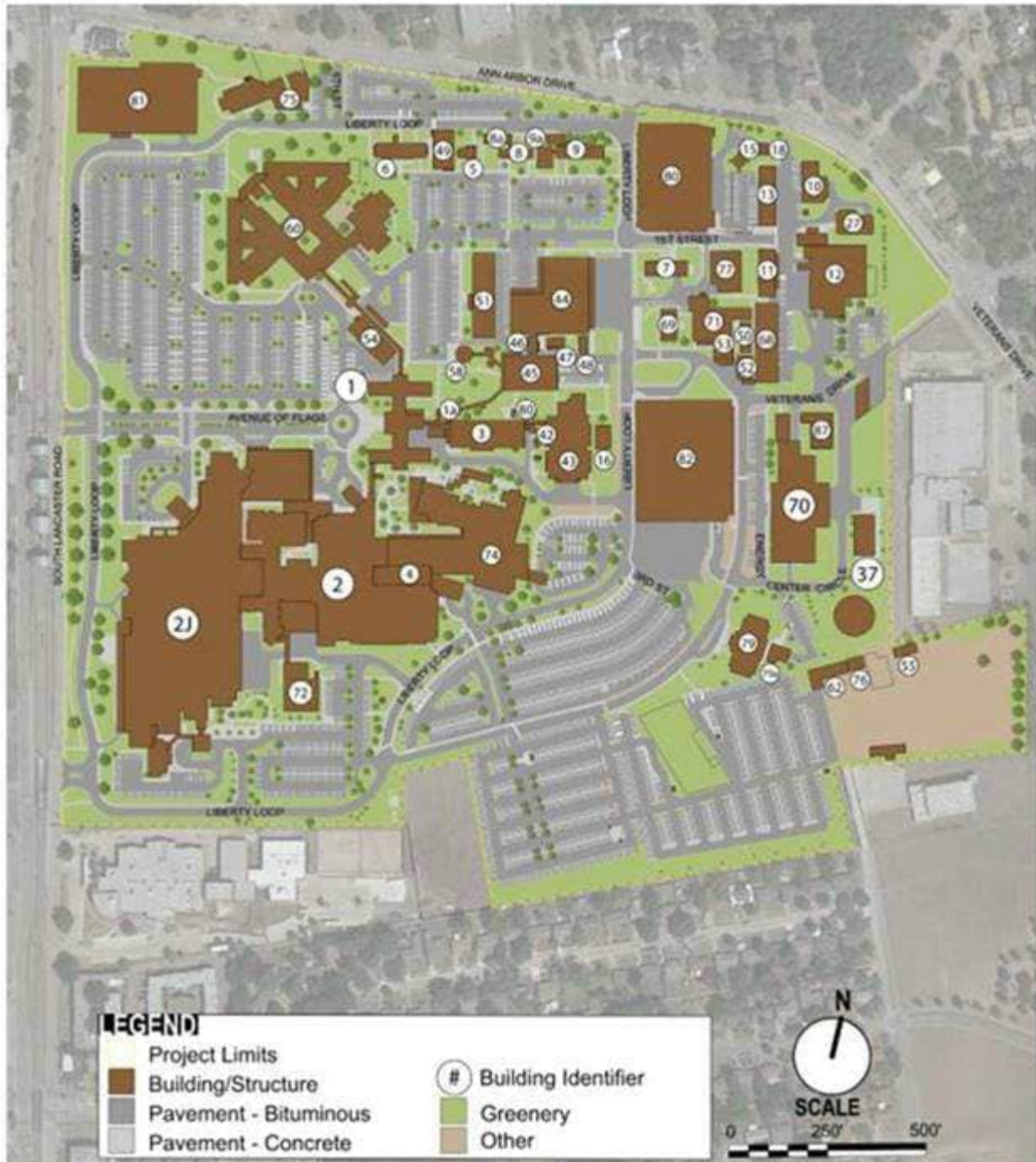
**DALLAS VAMC CAMPUS LOCATION**  
**Proposed LTSCI and CEMH Projects**  
**Dallas VA Medical Center**  
**4500 South Lancaster, Dallas, Texas**





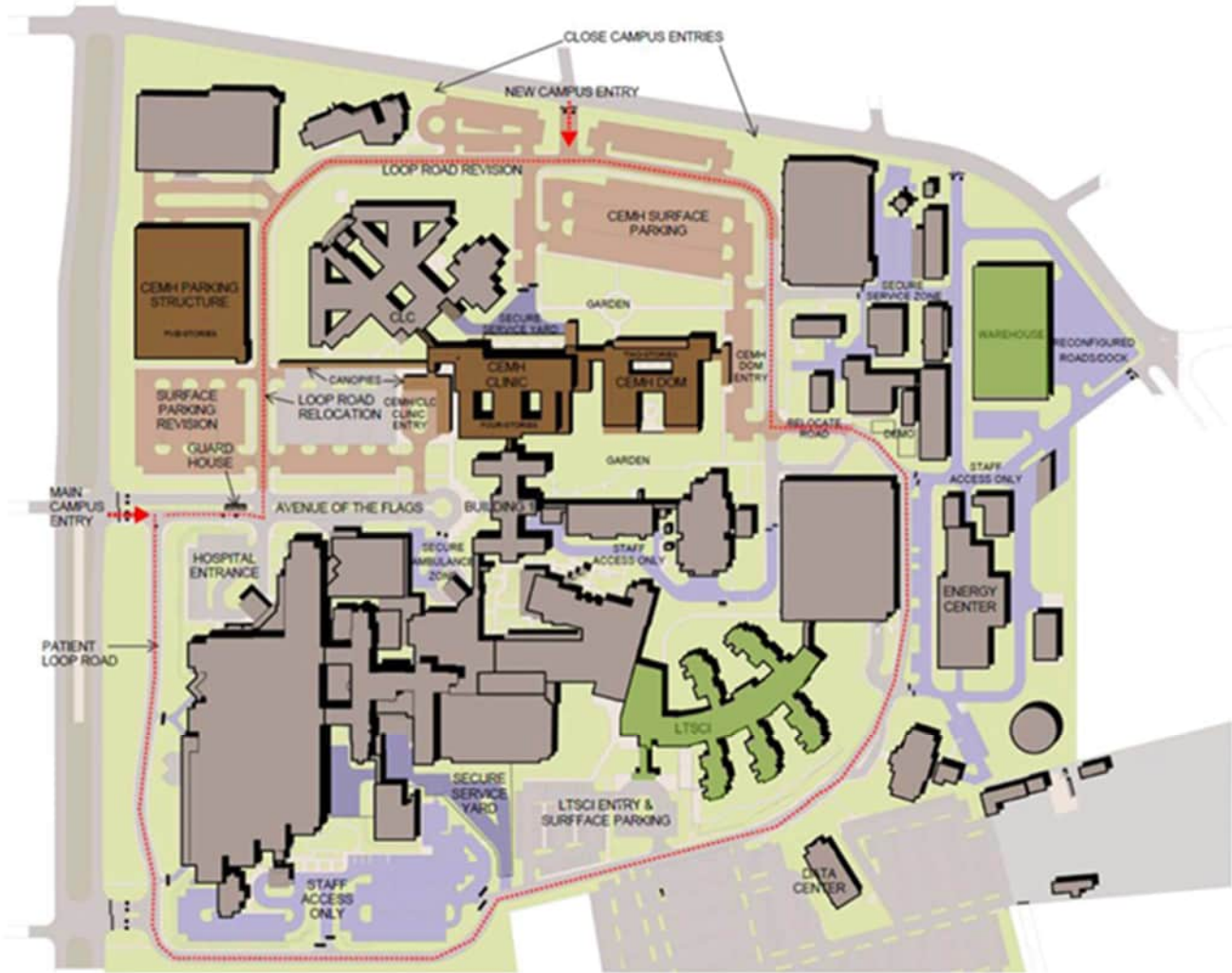
FIGURE 2

**EXISTING DALLAS VAMC CAMPUS CONFIGURATION**  
Proposed LTSCI and CEMH Projects  
Dallas VA Medical Center  
4500 South Lancaster, Dallas, Texas



**FIGURE 3**

**PRELIMINARY LTSCI and CEMH PROJECT SITE PLAN**  
**Proposed LTSCI and CEMH Projects**  
**Dallas VA Medical Center**  
**4500 South Lancaster, Dallas, Texas**

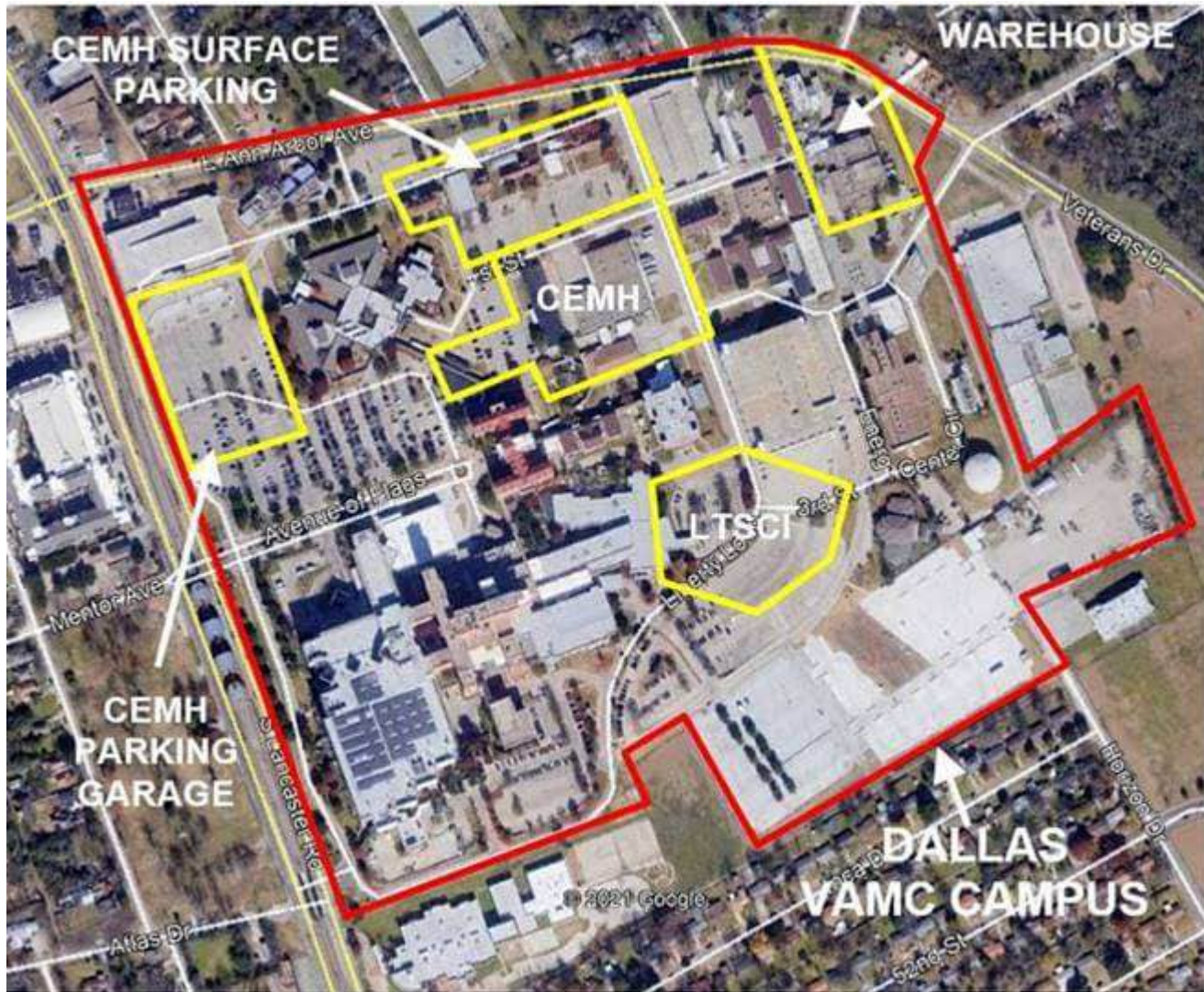




**FIGURE 4**

**PROPOSED LTSCI and CEMH PROJECT LOCATIONS**

**Proposed LTSCI and CEMH Projects  
Dallas VA Medical Center  
4500 South Lancaster, Dallas, Texas**



Thank you,  
Glenn

*"Fortitudine Vincimus"* By Endurance We Conquer.

**Glenn Elliott** | Director | Environmental Program Office  
Department of Veterans Affairs | Construction and Facilities Management (CFM)  
a: 425 "I" St. N.W. | Washington D.C. | 20001  
w: 202-632-5879 | c: 202-360-1243 | e: [glenn.elliott@va.gov](mailto:glenn.elliott@va.gov)  
[VA Website](#) | [CFM Website](#) | [Sustainable Design](#) | [TIL](#)

\*\*\*\*\*

This email had an attachment that may have been harmful and per security policy it was removed. If

you have any comments or questions about this procedure, contact your local ISO. The CONTENTS

of the attachment were NOT examined. The action taken was based on attachment type ( elliott\_20210701.zip / elliott\_20210701.zip / compressed/zip removed by filter).

\*\*\*\*\*

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



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## **APPENDIX C - NHPA SECTION 106 CONSULTATION AND NATIVE AMERICAN TRIBE CORRESPONDENCE**

# TEXAS HISTORICAL COMMISSION

## REQUEST FOR SHPO CONSULTATION:

### Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas

Please see instructions for completing this form and additional information on Section 106 and Antiquities Code consultation on the Texas Historical Commission website at <http://www.thc.state.tx.us/crm/crmsend.shtml>.

☒ This is a new submission.

☐ This is additional information relating to THC tracking number(s): \_\_\_\_\_

#### Project Information

PROJECT NAME <b>Construction &amp; Operation of Clinical Expansion of Mental Health (CEMH) &amp; Long Term Spinal Cord Injury (LTSCI) Facilities</b>		
PROJECT ADDRESS <b>4500 South Lancaster Road</b>	PROJECT CITY <b>Dallas</b>	PROJECT ZIP CODE(S) <b>75216</b>
PROJECT COUNTY OR COUNTIES <b>Dallas</b>		
PROJECT TYPE (Check all that apply) <input checked="" type="checkbox"/> Road/Highway Construction or Improvement <input type="checkbox"/> Site Excavation <input checked="" type="checkbox"/> Utilities and Infrastructure <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> Repair, Rehabilitation, or Renovation of Structure(s) <input checked="" type="checkbox"/> Addition to Existing Structure(s) <input checked="" type="checkbox"/> Demolition or Relocation of Existing Structure(s) <input type="checkbox"/> None of these		
BRIEF PROJECT DESCRIPTION: Please explain the project in one or two sentences. More details should be included as an attachment to this form. <b>VA NTHCS has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus. See cover letter for more information.</b>		

#### Project Contact Information

PROJECT CONTACT NAME <b>Karen Wieckowski</b>	TITLE <b>Project Manager</b>	ORGANIZATION <b>VA OCFM</b>	
ADDRESS <b>1425 Tri-State Parkway, Suite 140</b>	CITY <b>Gurnee</b>	STATE <b>IL</b>	ZIP CODE <b>60031</b>
PHONE <b>202-445-8901</b>	EMAIL <b>Karen.Wieckowski@va.gov (preferred communication)</b>		

#### Federal Involvement (Section 106 of the National Historic Preservation Act)

Does this project involve approval, funding, permit, or license from a federal agency? <input checked="" type="checkbox"/> Yes (Please complete this section) <input type="checkbox"/> No (Skip to next section)	
FEDERAL AGENCY <b>U.S. Department of Veterans Affairs</b>	FEDERAL PROGRAM, FUNDING, OR PERMIT TYPE <b>Major Project</b>
CONTACT PERSON <b>Karen Wieckowski</b>	PHONE <b>202-445-8901</b>
ADDRESS <b>1425 Tri-State Parkway, Suite 140 Gurnee, IL 60031</b>	EMAIL <b>Karen.Wieckowski@va.gov (preferred communication)</b>

#### State Involvement (Antiquities Code of Texas)

Does this project occur on land or property owned by the State of Texas or a political subdivision of the state? <input type="checkbox"/> Yes (Please complete this section) <input checked="" type="checkbox"/> No (Skip to next section)	
CURRENT OR FUTURE OWNER OF THE PUBLIC LAND	
CONTACT PERSON	PHONE
ADDRESS	EMAIL

### Identification of Historic Properties: Archeology

Does this project involve ground-disturbing activity?

☒ Yes (Please complete this section)

☐ No (Skip to next section)

Describe the nature of the ground-disturbing activity, including but not limited to depth, width, and length.  
**Demolition of existing buildings and structures; construction of multi-story medical buildings; roadway improvements; utility upgrades and installations**

**The exact areas of ground disturbance are unknown, but depths are anticipated to exceed 10 feet.**

Describe the previous and current land use, conditions, and disturbances.

**Native American occupation (undocumented), followed by agricultural cultivation, Veterans hospital construction initiated in the late 1930s. Currently a Veterans hospital.**

### Identification of Historic Properties: Structures

Does the project area or area of potential effects include buildings, structures, or designed landscape features (such as parks or cemeteries) that are 45 years of age or older?

☒ Yes (Please complete this section)

☐ No (Skip to next section)

Is the project area or area of potential effects within or adjacent to a property or district that is listed in or eligible for listing in the National Register of Historic Places?

☐ Yes, name of property or district:

☒ No

☐ Unknown

In the space below or as an attachment, describe each building, structure, or landscape feature within the project area or area of potential effect that is 45 years of age or older.

ADDRESS	DATE OF CONSTRUCTION	SOURCE FOR CONSTRUCTION DATE
See attached.		

### Attachments

[Please see detailed instructions regarding attachments.](#)

Include the following with each submission:

☒ Project Work Description

☒ Maps

☒ Identification of Historic Properties

☒ Photographs

For Section 106 reviews only, also include:

☒ Consulting Parties/Public Notification

☒ Area of Potential Effects

☒ Determination of Eligibility

☒ Determination of Effect

**Submit completed form and attachments to the address below. Faxes and email are not acceptable.**

Mark Wolfe

State Historic Preservation Officer

Texas Historical Commission

P.O. Box 12276, Austin, TX 78711-2276 (mail service)

108 W. 16th Street, Austin, TX 78701 (courier service)

### For SHPO Use Only



## U.S. Department of Veterans Affairs

Veterans Health Administration  
VA North Texas Health Care System

November 15, 2021

In Reply Refer To: 549/003

Mark Wolfe  
State Historic Preservation Officer  
Texas Historical Commission  
P.O. Box 12276  
Austin, TX 78711-2276

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear Mr. Wolfe:

From 2010 to 2013, the U.S. Department of Veterans Affairs VA North Texas Health Care System (VANTHCS) consulted in accordance with the National Historic Preservation Act (54 USC 300101 et seq.), specifically 54 USC § 306108, and 36 CFR Part 800 (collectively "Section 106") to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at the Dallas VA Medical Center (VAMC) (THC Project No. VA/106/201102288). Component projects of this Undertaking included construction of a medical building and a parking garage for the CEMH and a medical building, parking garage, and warehouse for the LTSCI. The proposed construction would have resulted in the demolition of Buildings 5, 6, 8, 9, 10, 12, and 27, and necessitated improvements to the campus roadways and circulation system. VANTHCS determined this Undertaking would adversely affect historic properties and consultation to resolve adverse effects resulted in the execution of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* on January 22, 2013 (2013 MOA). VANTHCS extended the 2013 MOA in December 2017 to provide more time to implement the Undertaking. The proposed construction has been delayed due to funding cycles and, to date, only the LTSCI parking garage has been built.

VA continually seeks to improve its facility design to meet the needs of Veterans and current standards of medical care. As a result, while the design of the LTSCI facility is largely complete and similar to the design proposed in 2010, the design of the CEMH facility is in development due to recent changes in VA's mental health space requirements. Given the state of the CEMH design and the need to phase assessment of adverse effects, VANTHCS proposes to consult with appropriate agencies, Tribes, and organizations in accordance with 36 CFR § 800.14(b), including § 800.14(b)(1)(ii), to develop a programmatic agreement (PA) to

*Corporate Office:* Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, TX 75216  
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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

supersede the 2013 MOA. Alex Toprac and Caitlin Brasher of the THC staff concurred with the plan to develop a new PA in a conversation on July 20, 2021. VA also received a recommendation from the Advisory Council on Historic Preservation related to developing a PA to supersede the 2013 MOA.

Definition of the Undertaking

VANTHCS has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus to address the undersized facilities and operational deficiencies at the Dallas VAMC and to support the rapidly growing Veteran demand for health care services in the region. VANTHCS has determined that the Undertaking is the construction and operation of LTSCI and CEMH facilities with all utilities and infrastructure. The improvements would be conducted in phases over a period of approximately six years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

As part of the Undertaking, the primary components of the CEMH project are anticipated to include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, TT51, and Structure 58. Building 44 is a one-story, concrete warehouse built in 1976. Building 45 is one-story, masonry/brick structure built in 1985 as a campus recreation facility and is also used for VA Fiscal and Medical Care Collections Fund Services offices. TT46 (VA Police Administration), TT47 (Fiscal Service), TT48 (Environmental Management Services Administrations), and TT51 (Human Resources) are all temporary trailers installed on the campus between 1992 and 2008. Structure 58 is a modern gazebo added to the campus in 1996. These buildings and structures would be demolished to make space for the CEMH facility.
- Construction and operation of a new approximately 215,000-square-foot CEMH facility in the north-central portion of the campus. The CEMH would consolidate and expand mental health services provided at the campus. Design of the CEMH facility is in progress. It could consist of one large building or two adjacent, connected buildings, one containing a mental health clinic and one containing residences for mental health patients. It is anticipated that the CEMH facility would be three to four stories in height.
- Demolition of Buildings 5, 6, 8, 9 and TT49. Building 5 is a two-story, masonry/brick structure built in 1940 as the VA Hospital Manager's Quarters and is currently vacant. Building 6 is a three-story masonry/brick structure built in 1940 as nurses' quarters and is currently used as a Mental Health Treatment Day Services Center and Veteran Recovery Center. Building 8 is a two-story masonry/brick structure built in 1940 as a residence for the hospital director and chief surgeon and is currently used for Acquisition and Material Management. Building 9 is a one-story masonry/brick structure built in 1955 as a residence for the hospital physicians or other senior personnel and is currently used for Engineering Services. TT49 (Quality Management Services) is a temporary trailer that was installed on the campus in 2005.
- Reconfiguration/relocation of Liberty Loop and the construction of surface parking lots for the CEMH in the northern portion of the campus, in the location of the to be demolished Buildings 5, 6, 8, 9 and TT49. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.

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- Construction and operation of a new approximately 1,000-car, up to 5-story parking garage associated with the CEMH facility in the northwestern portion of the campus, in the northern portion of current Parking Lot 1.
- Vacation of mental health space in Building 1. Renovation of the vacated space may be necessary to accommodate a new function, however, significant modifications are not anticipated at this time. If and when such plans are developed, VANTHCS will consult in accordance with 36 CFR Part 800

As part of this Undertaking, the primary components of the LTSCI project include:

- Demolition of the small east wing of Building 74.
- Construction and operation a new approximately 172,000-square-foot, three-story (plus basement) LTSCI facility in the southeastern portion of the campus, adjacent to Building 74, in the location of the to be demolished eastern wing of Building 74. The LTSCI would provide residences for Veterans with long-term spinal cord injuries and would house an Outpatient Spinal Cord Injury Clinic and physical/occupational therapy facilities.
- Demolition of Buildings 10, 12, and 27. Building 10 is a two-story, masonry/brick structure built in 1940 as the campus boiler house and has been vacant since the early 1990s, when the new campus Energy Center (Building 70) was constructed. Building 12 is a two-story masonry/brick structure built between 1947 and 1955 and is used for the campus laundry. Building 27 is a one-story, masonry/brick warehouse built in 1991.
- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse. The first floor of the building would primarily be used for storage and would include some office space. The second floor would include VAMC offices.
- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace the displaced laundry services from Building 12.
- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

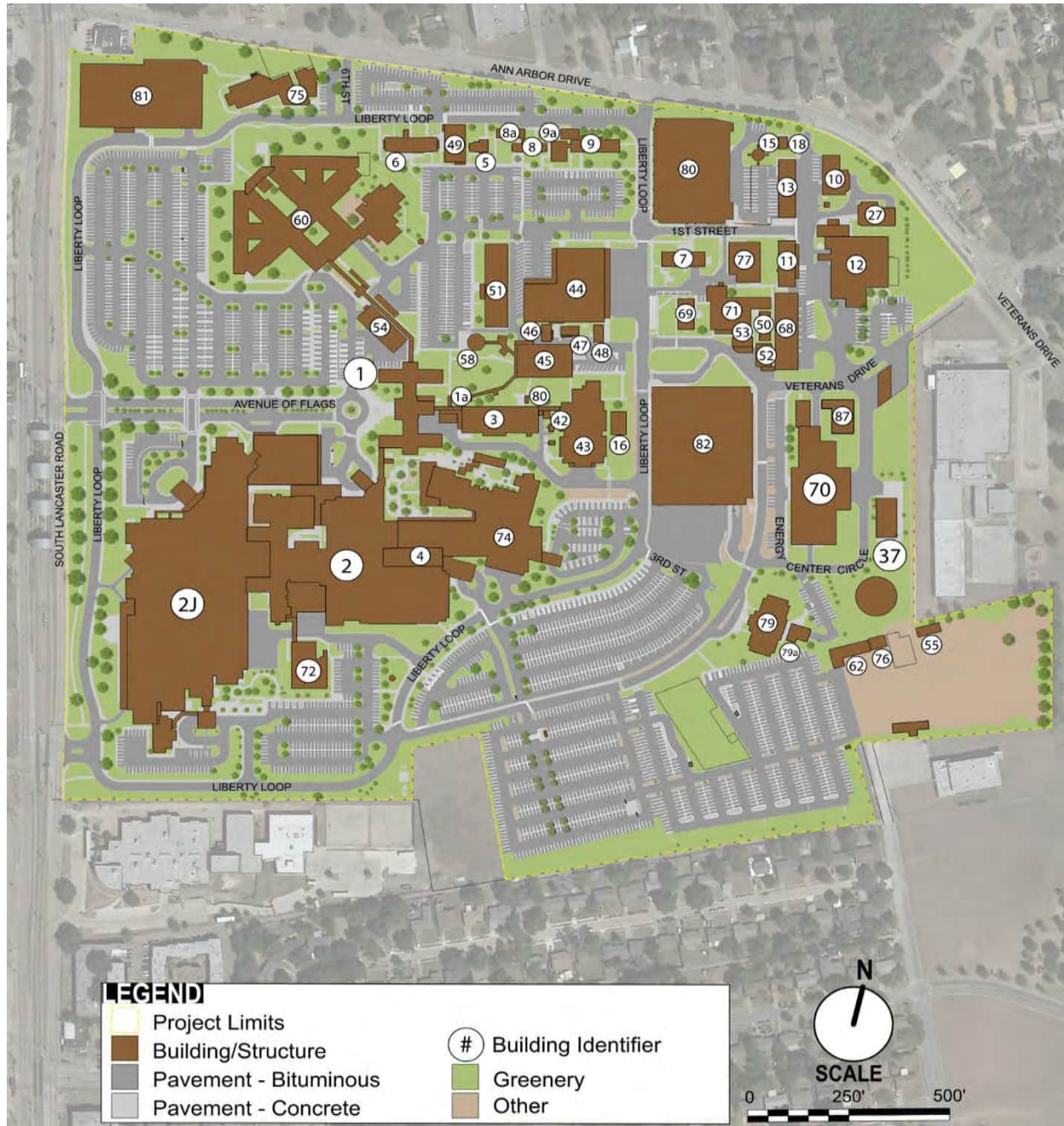
In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development.

Figure 1 - Rendering of the Dallas VAMC following construction of the CEMH and LTSCI facilities. Although the design of the LTSCI facilities (shown in green) is largely complete, the design of the CEMH facilities (shown in brown) is in development.

Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).



**FIGURE 2 – DALLAS VAMC WITH THE APE INDICATED IN YELLOW**



*Figure 2 – Dallas VAMC with the APE indicated in yellow*

### Identification of Historic Properties

**Built Resources** - There are 54 built resources currently on the grounds of the Dallas VAMC. Since 2010, when VANTHCS first initiated consultation related to this Undertaking, VA has conducted two nationwide studies of its twentieth century hospitals resulting in historic contexts reviewed and approved by the Keeper of the National Register of Historic Places.

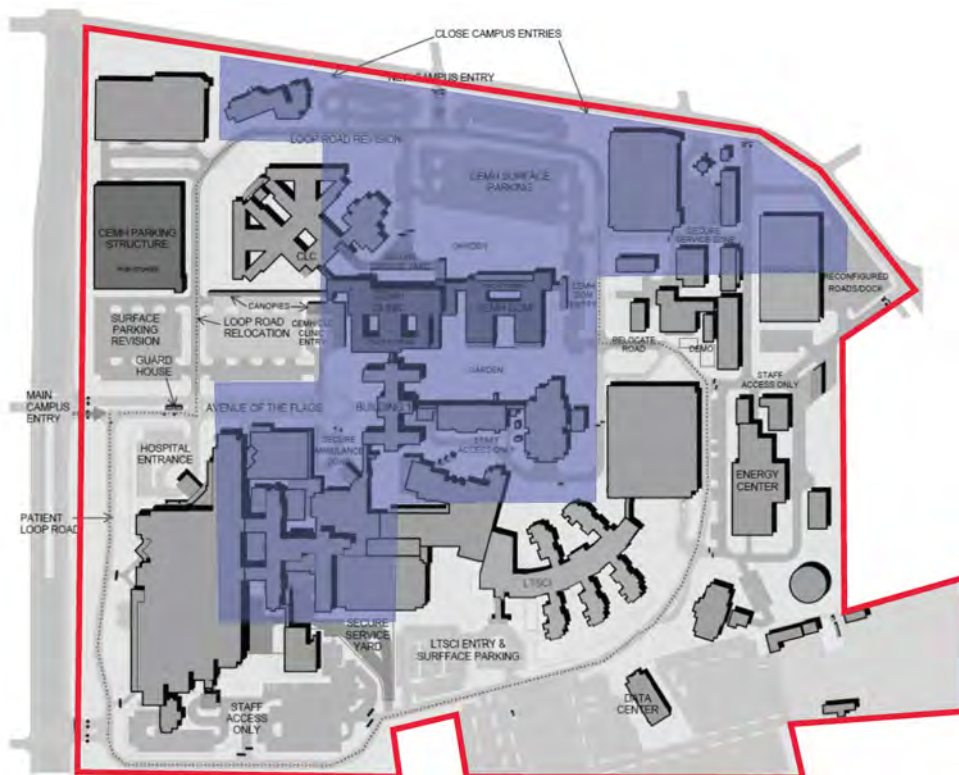


National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

VANTHCS has determined, based on a reassessment of existing built resources of the Dallas VAMC, that only Building 1, with Building 3 as an associated component, retains sufficient integrity and possesses the significance necessary to be individually listed in the National Register of Historic Properties. The remaining built resources were determined not eligible not eligible for listing in the National Register. See Attachment A for more detail.

*Archaeological Resources* - Archaeological investigations in 2010 identified Site 41DL499 along the northern border of the Dallas VAMC. Twelve of the fifteen shovel tests contained cultural materials. These materials related to the farmstead predating the construction of the campus and the tenure of VA and its predecessor at the Dallas VAMC. Investigations were limited to 1.2 acres of the campus.<sup>1</sup> In 2011, the THC concurred the site had little research potential and was not eligible for listing in the National Register of Historic Places. In 2011, the site was revisited and additional ground near the engineering buildings investigated. This effort determined the portions of the site investigated held no potential due to the extensive ground disturbances in the area from site development. (Figure 3).<sup>2</sup>

**Figure 2 - ONE POTENTIAL DESIGN OF THE DALLAS VAMC CAMPUS FOLLOWING CONSTRUCTION OF THE CEMH AND LTSCI FACILITY FOOTPRINTS. THE PURPLE SHADED AREA REPRESENTS THE APPROXIMATE BOUNDARIES OF 41DL499**



*Figure 3 One potential design of the Dallas VAMC campus following construction of the CEMH and LTSCI facility footprints. - The purple shaded area represents the approximate boundaries of Site 41DL499.*

<sup>1</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049901, May 10, 2010.

<sup>2</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049902, October 24, 2011.

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### Assessment of Adverse Effect

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

Upgrades to existing utilities are unlikely to produce adverse effects because the existing corridors were disturbed during installation and again during any work since their initial installation. Improvements requiring work in new areas or expansion of existing corridors into previously undisturbed areas has the potential to affect intact deposits, if any are present. Resurfacing of existing roadways is unlikely to disturb archaeological resources, however, construction of new road paths or removal of existing roads could disturb intact deposits, if any are present.

The effects of construction – noise, temporary alteration of campus roadways, installation of staging areas and trailers on existing hardscape – are temporary.

*CEMH* - VANTHCS has not finalized a design for CEMH facilities, including associated utilities and roadway improvements, and therefore the full range of effects on historic properties cannot be fully determined at this time. There is potential for the design to affect Building 1, both directly and indirectly.

*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. As seen in Figure 1, there are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

### Public Involvement

Pursuant to 36 CFR § 800.2(d), VANTHCS intends to provide information to the public and seek comments on the Undertaking, through a public announcement on the VANTHCS website on August 24, 2021. As of October 13, 2021, VANTHCS has not received any responses. Additionally, VANTHCS will seek comments from the public on the Undertaking through National Environmental Policy Act (NEPA) compliance efforts. This outreach has involved notices in The Dallas Morning News from July 4 - 6, 2021 and will involve review of draft Environmental Assessment.

VANTHCS has also invited the following Tribes, agencies, and organizations to participate in consultation: the ACHP; the Apache Tribe of Oklahoma; Comanche Nation; Coushatta Tribe of Louisiana; Tonkawa Tribe; and the Wichita & Affiliated Tribes; the City of Dallas Office of Historic Preservation, as the Certified Local Government; the Dallas County Historical Commission; and Preservation Dallas.

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Consultation

Therefore, VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects. VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually. Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Holt", with a stylized flourish at the end.

Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosure

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission

**DATE**

Mark Wolfe  
State Historic Preservation Officer  
Texas Historical Commission  
PO Box 12276  
Austin, Texas 78711-2276

Re: U.S. Department of Veterans Affairs North Texas Health Care System (VANTHCS), Dallas, Texas  
Memorandum of Agreement – Clinical Expansion for Mental Health & Long Term Spinal Cord  
Injury Projects

Dear Mr. Wolfe:

This summary report is submitted in partial fulfillment of Stipulation II of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* (MOA) executed January 22, 2013 and extended in 2017. The mitigation measures included in the MOA were not completed due to lack of funding.

VANTHCS has determined the Undertaking described above has changed to meet updated VA design requirements. Although VANTHCS still intends to construct mental health (CEMH) and spinal cord injury (LTSCI) facilities, the design for the CEMH is in development and the full extent of effects to historic properties cannot be determined at this time. VANTHCS intends to supersede the MOA with a programmatic agreement developed in consultation with your office, the Advisory Council on Historic Preservation, and interested Tribes and Consulting Parties.

VANTHCS will not complete the mitigation measures included in the MOA and instead will develop measures to resolve adverse effects of the expanded Undertaking through consultation with your office and interested federally recognized Tribes and other parties. For your records, the state of the MOA mitigation measures is:

1. Documentation of Buildings 5, 6, and 10 – Incomplete.
2. Windshield Survey – A draft windshield survey of the campus was completed in 2018 but this report was never finalized. VANTHCS completed a windshield survey of the campus in 2021 as part of its obligations to identify historic properties under 54 U.S.C. § 306108 of the National Historic Preservation Act and 36 CFR § 800.4 as part of the refinements to the Undertaking. A copy of this report is included in this transmission.
3. National Register Nomination for Building 1 – Incomplete.
4. Rehabilitation of the Lobby of Building 1 – Such a project is not included as part of the funding for the Undertaking and is not related to construction and operation of CEMH and LTSCI facilities. The project is incomplete due to lack of funding and will not be included in the programmatic agreement.
5. Historical Markers – Incomplete.

Please notify Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) if you have any questions or require additional information.

Sincerely,

Dr. Stephen R. Holt

Hospital Director

Cc:

Angela McArdle, Program Analyst, Advisory Council on Historic Preservation

Alex Toprac, Project Reviewer, Texas Historical Commission

Caitlin Brashear, Historian, Texas Historical Commission

Rebecca Shelton, Terrestrial Archeologist, Texas Historical Commission

Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs

Karen Wieckowski, Project Manager, U.S. Department of Veterans Affairs





**Advisory Council on Historic Preservation  
Electronic Section 106 Documentation Submittal System (e106) Form  
*MS Word* format**

Send to: [e106@achp.gov](mailto:e106@achp.gov)

Please review the instructions at [www.achp.gov/e106-email-form](http://www.achp.gov/e106-email-form) prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

**I. Basic information**

**1. Purpose of notification.** Indicate whether this documentation is to:

- ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- ☒ Invite the ACHP to participate in a Section 106 consultation
- ☒ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- ☐ Supply additional documentation for a case already entered into the ACHP record system
- ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- ☐ Other, please describe

[Click here to enter text.](#)

**2. ACHP Project Number** (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): [Click here to enter text.](#)

**3. Name of federal agency** (If multiple agencies, list them all and indicate whether one is the lead agency):

U.S. Department of Veterans Affairs

**4. Name of undertaking/project** (Include project/permit/application number if applicable):

Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System

**5. Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

No Tribal lands

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 ☐ Washington, DC 20001-2637

Phone: 202-517-0200 ☐ Fax: 202-517-6381 ☐ [achp@achp.gov](mailto:achp@achp.gov) ☐ [www.achp.gov](http://www.achp.gov)

**6. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:**

Karen Wieckowski, VA Project Manager, 202-445-8901, [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov)

**II. Information on the Undertaking\***

**7. Describe the undertaking and nature of federal involvement** (if multiple federal agencies are involved, specify involvement of each):

VANTHCS has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus to address the undersized facilities and operational deficiencies at the Dallas VAMC and to support the rapidly growing Veteran demand for health care services in the region. VANTHCS has determined that the Undertaking is the construction and operation of LTSCI and CEMH facilities with all utilities and infrastructure. The improvements would be conducted in phases over a period of approximately six years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

**8. Describe the Area of Potential Effects (APE):**

Dallas VA Medical Center campus

**9. Describe steps taken to identify historic properties:**

Built resource survey

Limited archaeological investigations

**10. Describe the historic property** (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

VA has determined Building 1 (with Building 3 as a component) eligible for listing in the National Register of Historic Places.

**11. Describe the undertaking's effects on historic properties:**

See attached letter.

**12. Explain how this undertaking would adversely affect historic properties** (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

See attached letter.

**13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public,** including any correspondence from the SHPO and/or THPO.

See attached letter.

### III. Additional Information

**14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation.** Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

VA intends to develop a programmatic agreement to supercede an existing memorandum of agreement.  
See attached letter.

**15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:**

**16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:**

No

**The following are attached to this form (check all that apply):**

- ☒ Section 106 consultation correspondence
- ☒ Maps, photographs, drawings, and/or plans
- ☐ Additional historic property information
- ☐ Consulting party list with known contact information
- ☐ Other: [Click here to enter text.](#)



## U.S. Department of Veterans Affairs

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

Reid Nelson  
Executive Director, Acting  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001

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Dear Mr. Nelson:

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- Construction and operation of a new approximately 215,000-square-foot CEMH facility in the north-central portion of the campus. The CEMH would consolidate and expand mental health services provided at the campus. Design of the CEMH facility is in progress. It could consist of one large building or two adjacent, connected buildings, one containing a mental health clinic and one containing residences for mental health patients. It is anticipated that the CEMH facility would be three to four stories in height.
- Demolition of Buildings 5, 6, 8, 9 and TT49. Building 5 is a two-story, masonry/brick structure built in 1940 as the VA Hospital Manager's Quarters and is currently vacant. Building 6 is a three-story masonry/brick structure built in 1940 as nurses' quarters and is currently used as a Mental Health Treatment Day Services Center and Veteran Recovery Center. Building 8 is a two-story masonry/brick structure built in 1940 as a residence for the hospital director and chief surgeon and is currently used for Acquisition and Material Management. Building 9 is a one-story masonry/brick structure built in 1955 as a residence for the hospital physicians or other senior personnel and is currently used for Engineering Services. TT49 (Quality Management Services) is a temporary trailer that was installed on the campus in 2005.
- Reconfiguration/relocation of Liberty Loop and the construction of surface parking lots for the CEMH in the northern portion of the campus, in the location of the to be demolished Buildings 5, 6, 8, 9 and TT49. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.



National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

- Construction and operation of a new approximately 1,000-car, up to 5-story parking garage associated with the CEMH facility in the northwestern portion of the campus, in the northern portion of current Parking Lot 1.
- Vacation of mental health space in Building 1. Renovation of the vacated space may be necessary to accommodate a new function, however, significant modifications are not anticipated at this time. If and when such plans are developed, VANTHCS will consult in accordance with 36 CFR Part 800.

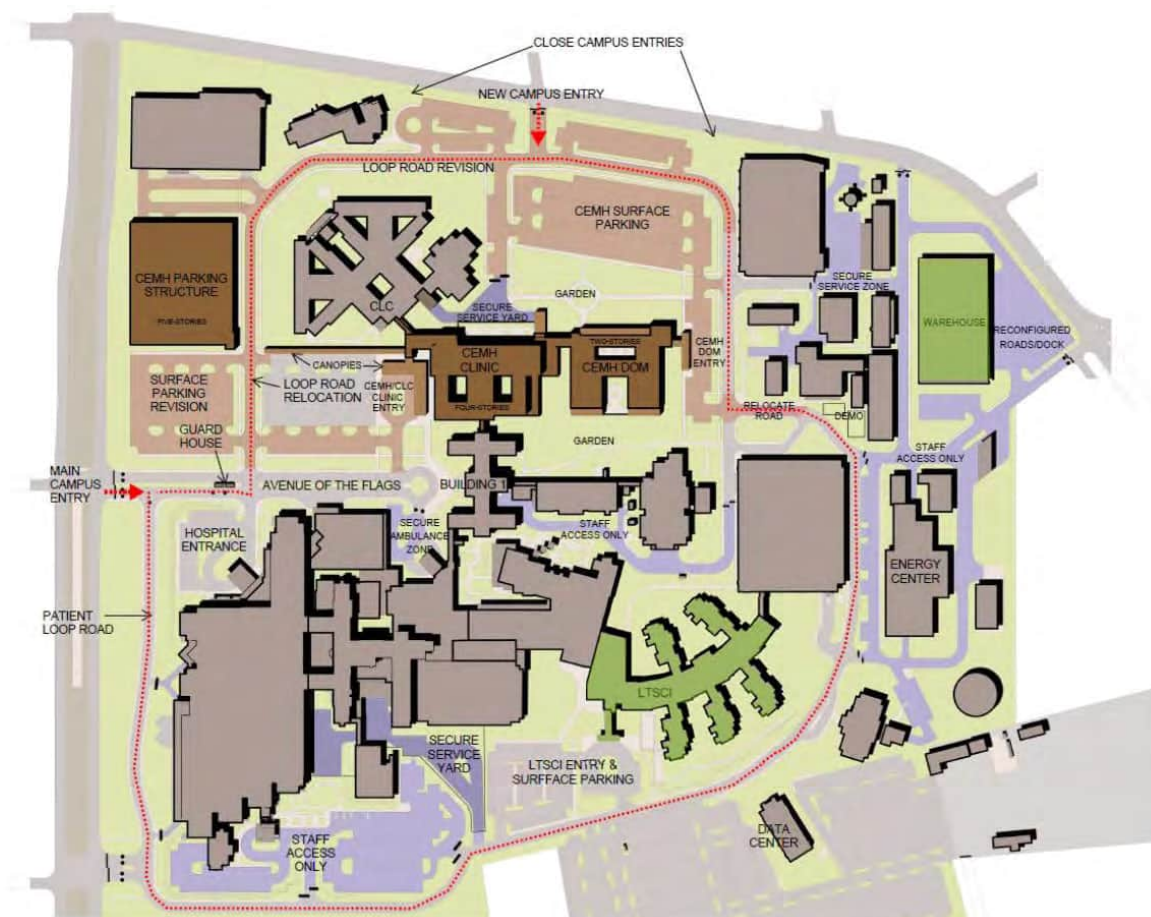
As part of this Undertaking, the primary components of the LTSCI project include:

- Demolition of the small east wing of Building 74.
- Construction and operation a new approximately 172,000-square-foot, three-story (plus basement) LTSCI facility in the southeastern portion of the campus, adjacent to Building 74, in the location of the to be demolished eastern wing of Building 74. The LTSCI would provide residences for Veterans with long-term spinal cord injuries and would house an Outpatient Spinal Cord Injury Clinic and physical/occupational therapy facilities.
- Demolition of Buildings 10, 12, and 27. Building 10 is a two-story, masonry/brick structure built in 1940 as the campus boiler house and has been vacant since the early 1990s, when the new campus Energy Center (Building 70) was constructed. Building 12 is a two-story masonry/brick structure built between 1947 and 1955 and is used for the campus laundry. Building 27 is a one-story, masonry/brick warehouse built in 1991.
- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse. The first floor of the building would primarily be used for storage and would include some office space. The second floor would include VAMC offices.
- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace the displaced laundry services from Building 12.
- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development.

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

**FIGURE 1 - RENDERING OF THE DALLAS VAMC FOLLOWING CONSTRUCTION OF THE CEMH AND LTSCI FACILITIES. ALTHOUGH THE DESIGN OF THE LTSCI FACILITIES (SHOWN IN GREEN) IS LARGELY COMPLETE, THE DESIGN OF THE CEMH FACILITIES (SHOWN IN BROWN) IS IN DEVELOPMENT**



*Figure 1 – Rendering of the Dallas VAMC following construction of the CEMH and LTSCI facilities. Although the design of the LTSCI facilities (shown in green) is largely complete, the design of the CEMH facilities (shown in brown) is in development.*

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Delineation of the Area of Potential Effect (APE)

Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).

**FIGURE 2 – DALLAS VAMC WITH THE APE INDICATED IN YELLOW**

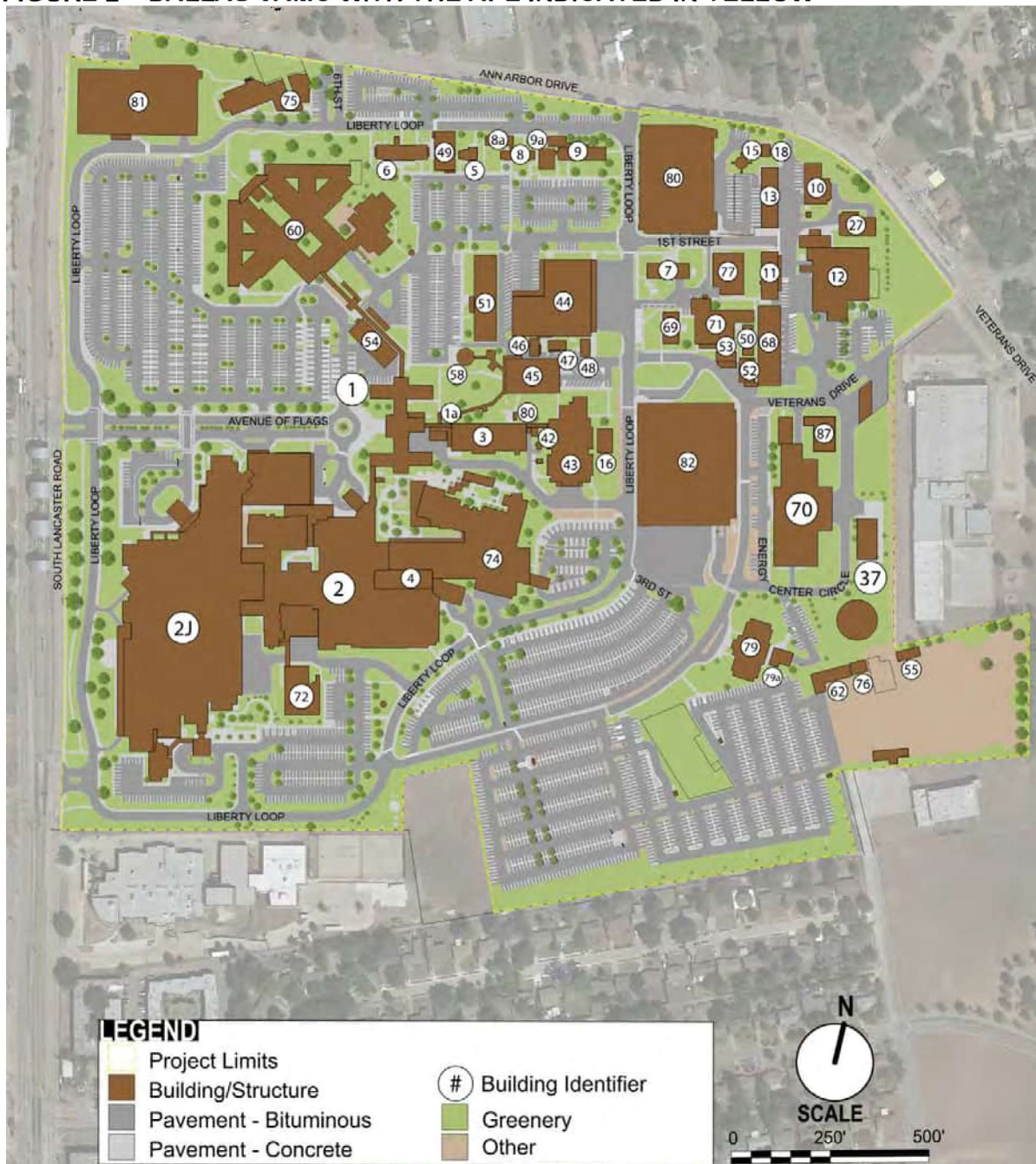


Figure 2 – Dallas VAMC with the APE indicated in yellow

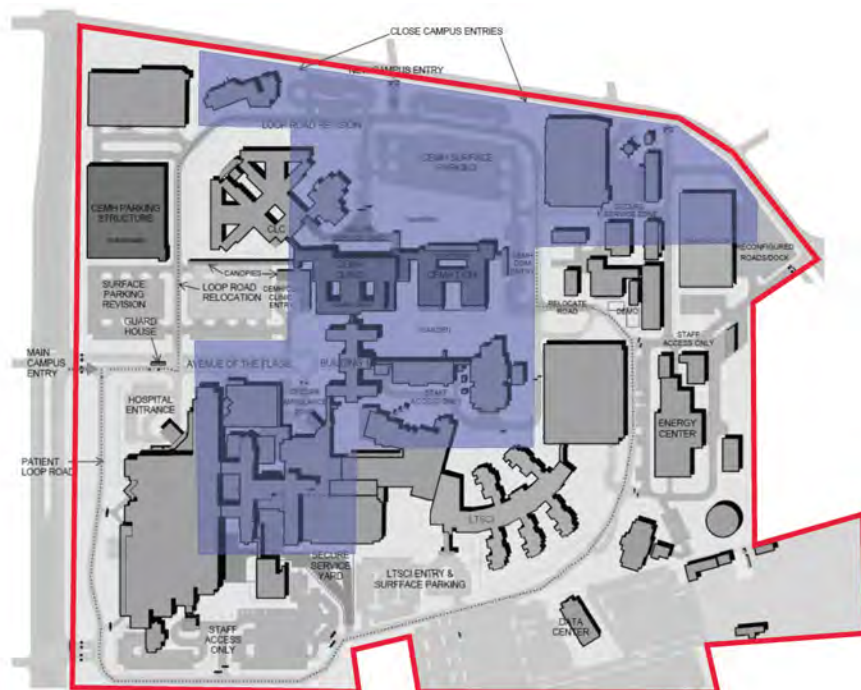


### Identification of Historic Properties

*Built Resources* - There are 54 built resources currently on the grounds of the Dallas VAMC. Since 2010, when VANTHCS first initiated consultation related to this Undertaking, VA has conducted two nationwide studies of its twentieth century hospitals resulting in historic contexts reviewed and approved by the Keeper of the National Register of Historic Places. VANTHCS has determined, based on a reassessment of existing built resources of the Dallas VAMC, that only Building 1, with Building 3 as an associated component, retains sufficient integrity and possesses the significance necessary to be individually listed in the National Register of Historic Properties. The remaining built resources were determined not eligible not eligible for listing in the National Register. See Attachment A for more detail.

*Archaeological Resources* - Archaeological investigations in 2010 identified Site 41DL499 along the northern border of the Dallas VAMC. Twelve of the fifteen shovel tests contained cultural materials. These materials related to the farmstead predating the construction of the campus and the tenure of VA and its predecessor at the Dallas VAMC. Investigations were limited to 1.2 acres of the campus.<sup>1</sup> In 2011, the THC concurred the site had little research potential and was not eligible for listing in the National Register of Historic Places. In 2011, the site was revisited and additional ground near the engineering buildings investigated. This effort determined the portions of the site investigated held no potential due to the extensive ground disturbances in the area from site development. (Figure 3).<sup>2</sup>

**FIGURE 3 – ONE POTENTIAL DESIGN OF THE DALLAS VAMC CAMPUS FOLLOWING CONSTRUCTION OF CEMH AND LTSCI FACILITY FOOTPRINTS. THE PURPLE SHADED AREAS REPRESENTS THE APPROXIMATE BOUNDARIES OF SITE 41DL499.**



*Figure 3 - One potential design of the Dallas VAMC campus following construction of the CEMH and LTSCI facility footprints. The purple shaded area represents the approximate boundaries of Site 41DL499.*

<sup>1</sup> Steven Hunt, Site 41DL499, Atas No. 9113049901, May 10, 2010.

<sup>2</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049902, October 24, 2011.

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

### Assessment of Adverse Effect

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

Upgrades to existing utilities are unlikely to produce adverse effects because the existing corridors were disturbed during installation and again during any work since their initial installation. Improvements requiring work in new areas or expansion of existing corridors into previously undisturbed areas has the potential to affect intact deposits, if any are present. Resurfacing of existing roadways is unlikely to disturb archaeological resources, however, construction of new road paths or removal of existing roads could disturb intact deposits, if any are present.

The effects of construction – noise, temporary alteration of campus roadways, installation of staging areas and trailers on existing hardscape – are temporary.

*CEMH* - VANTHCS has not finalized a design for CEMH facilities, including associated utilities and roadway improvements, and therefore the full range of effects on historic properties cannot be fully determined at this time. There is potential for the design to affect Building 1, both directly and indirectly.

*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. As seen in Figure 1, there are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

### Public Involvement

Pursuant to 36 CFR § 800.2(d), VANTHCS intends to provide information to the public and seek comments on the Undertaking, through a public announcement on the VANTHCS website on August 24, 2021. As of October 13, 2021, VANTHCS has not received any responses. Additionally, VANTHCS will seek comments from the public on the Undertaking through National Environmental Policy Act (NEPA) compliance efforts. This outreach has involved notices in The Dallas Morning News from July 4 - 6, 2021 and involved review of draft Environmental Assessment.

VANTHCS has also invited the following Tribes, agencies, and organizations to participate in consultation: the THC, as the Texas State Historic Preservation Office; the Apache Tribe of Oklahoma; Comanche Nation; Coushatta Tribe of Louisiana; Tonkawa Tribe; and the Wichita & Affiliated Tribes; the City of Dallas Office of Historic Preservation, as the Certified Local Government; the Dallas County Historical Commission; and Preservation Dallas.



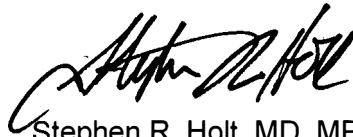
National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

### Consultation

VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects. VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually. Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,



Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosure

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission



## U.S. Department of Veterans Affairs

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

Durell Cooper, III  
Chairman  
Apache Tribe of Oklahoma  
P.O. Box 1330  
Anadarko, OK 73005

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear Chairman Cooper:

From 2010 to 2013, the U.S. Department of Veterans Affairs VA North Texas Health Care System (VANTHCS) consulted in accordance with the National Historic Preservation Act (54 USC 300101 et seq.), specifically 54 USC § 306108, and 36 CFR Part 800 (collectively "Section 106") to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at Dallas VA Medical Center (VAMC) (THC Project No. VA/106/201102288). Component projects of this Undertaking included construction of a medical building and a parking garage for the CEMH and a medical building, parking garage, and warehouse for the LTSCI. The proposed construction would have resulted in the demolition of Buildings 5, 6, 8, 9, 10, 12, and 27, and necessitated improvements to the campus roadways and circulation system. VANTHCS determined this Undertaking would adversely affect historic properties and consultation to resolve adverse effects resulted in the execution of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* on January 22, 2013 (2013 MOA). VANTHCS extended the 2013 MOA in December 2017 to provide more time to implement the Undertaking. The proposed construction has been delayed due to funding cycles and, to date, only the LTSCI parking garage has been built.

VA continually seeks to improve its facility design to meet the needs of Veterans and current standards of medical care. As a result, while the design of the LTSCI facility is largely complete and similar to the design proposed in 2010, the design of the CEMH facility is in development due to recent changes in VA's mental health space requirements. Given the state of the CEMH design and the need to phase assessment of adverse effects, VANTHCS proposes to consult with appropriate agencies, Tribes, and organizations in accordance with

*Corporate Office:* Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, TX 75216  
Sam Rayburn Memorial Veterans Center, 1201 East Ninth Street, Bonham, TX 75418  
Fort Worth Outpatient Clinic, 2201 SE Loop 820, Fort Worth, TX 76119  
Tyler VA Primary Care Clinic, 7916 S. Broadway Ave, Tyler, TX 75703  
Polk Street Annex Primary Care Clinic, 4243 S. Polk Street, Dallas, TX 75224  
Plano VA Outpatient Clinic, 3804 W, 15<sup>th</sup> Street, Plano, TX 75075  
Grand Prairie VA Outpatient Clinic, 2737 Sherman Drive, Grand Prairie, TX 75051  
Garland VA Medical Center, 2300 Marie Curie Boulevard, Garland, TX 75042

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

36 CFR § 800.14(b), including § 800.14(b)(1)(ii), to develop a programmatic agreement (PA) to supersede the 2013 MOA.

### Definition of the Undertaking

VANTHCS has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus to address the undersized facilities and operational deficiencies at the Dallas VAMC and to support the rapidly growing Veteran demand for health care services in the region. VANTHCS has determined that the Undertaking is the construction and operation of LTSCI and CEMH facilities with all utilities and infrastructure. The improvements would be conducted in phases over a period of approximately six years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

As part of the Undertaking, the primary components of the CEMH project are anticipated to include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, TT51, and Structure 58.
- Construction and operation of a new approximately 215,000-square-foot CEMH facility in the north-central portion of the campus. The CEMH would consolidate and expand mental health services provided at the campus. Design of the CEMH facility is in progress. It could consist of one large building or two adjacent, connected buildings, one containing a mental health clinic and one containing residences for mental health patients. It is anticipated that the CEMH facility would be three to four stories in height.
- Demolition of Buildings 5, 6, 8, 9 and TT49.
- Reconfiguration/relocation of Liberty Loop and the construction of surface parking lots for the CEMH in the northern portion of the campus. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.
- Construction and operation of a new approximately 1,000-car, up to 5-story parking garage associated with the CEMH facility in the northwestern portion of the campus, in the northern portion of current Parking Lot 1.
- Vacation of mental health space in Building 1. Renovation of the vacated space may be necessary to accommodate a new function, however, significant modifications are not anticipated at this time.

As part of this Undertaking, the primary components of the LTSCI project include:

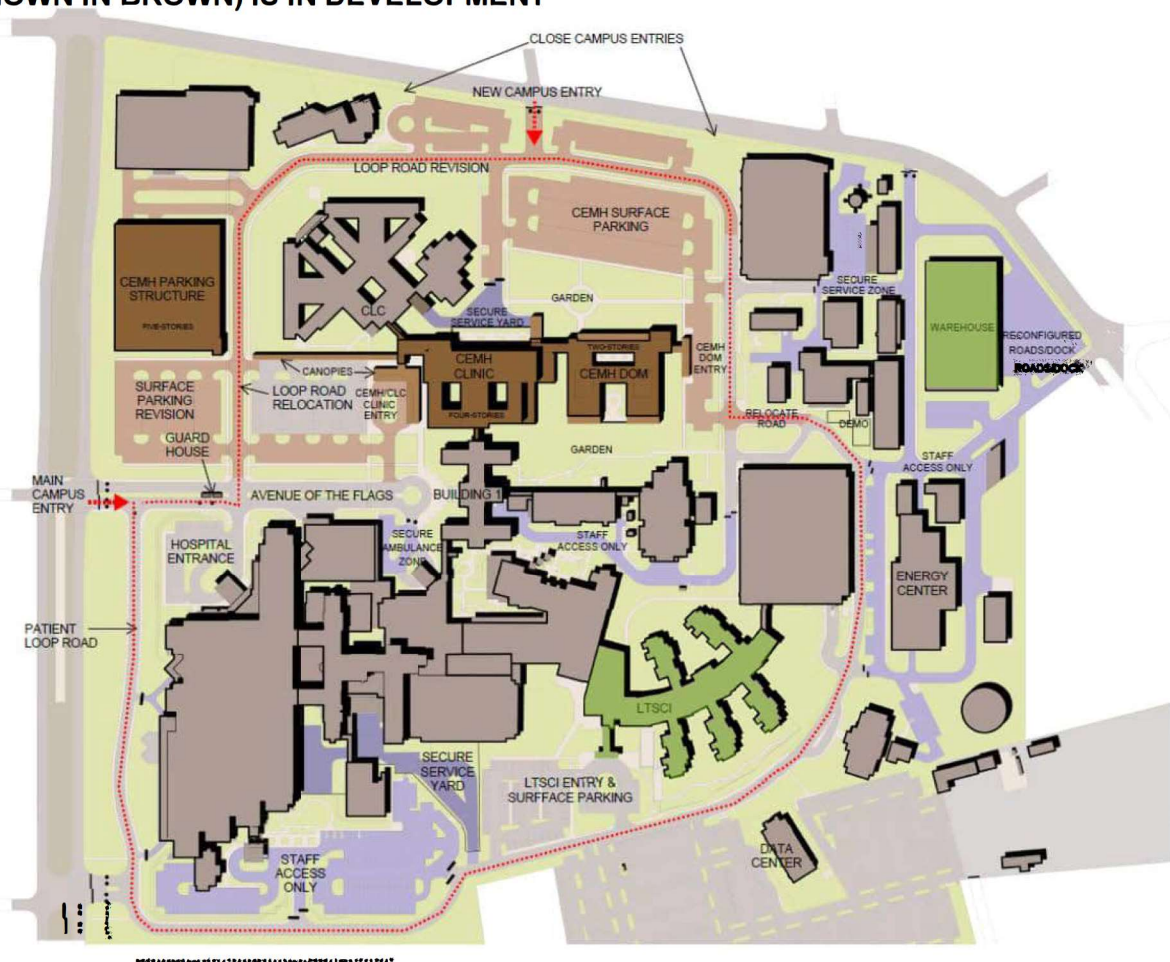
- Demolition of the small east wing of Building 74.
- Construction and operation a new approximately 172,000-square-foot, three-story (plus basement) LTSCI facility in the southeastern portion of the campus, adjacent to Building 74, in the location of the to be demolished eastern wing of Building 74. The LTSCI would provide residences for Veterans with long-term spinal cord injuries and would house an Outpatient Spinal Cord Injury Clinic and physical/occupational therapy facilities.
- Demolition of Buildings 10, 12, and 27.
- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse.

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace the displaced laundry services.
- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development. A graphic depicting one concept is shown in Figure 1. This design concept is not final.

**FIGURE 1 - RENDERING OF THE DALLAS VAMC FOLLOWING CONSTRUCTION OF THE CEMH AND LTSCI FACILITIES. ALTHOUGH THE DESIGN OF THE LTSCI FACILITIES (SHOWN IN GREEN) IS LARGELY COMPLETE, THE DESIGN OF THE CEMH FACILITIES (SHOWN IN BROWN) IS IN DEVELOPMENT**



*Figure 1 – Rendering of the Dallas VAMC following construction of the CEMH and LTSCI facilities. Although the design of the LTSCI facilities (shown in green) is largely complete, the design of the CEMH facilities (shown in brown) is in development.*



National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Delineation of the Area of Potential Effect (APE)

Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).

**FIGURE 2 – DALLAS VAMC WITH THE APE INDICATED IN YELLOW**

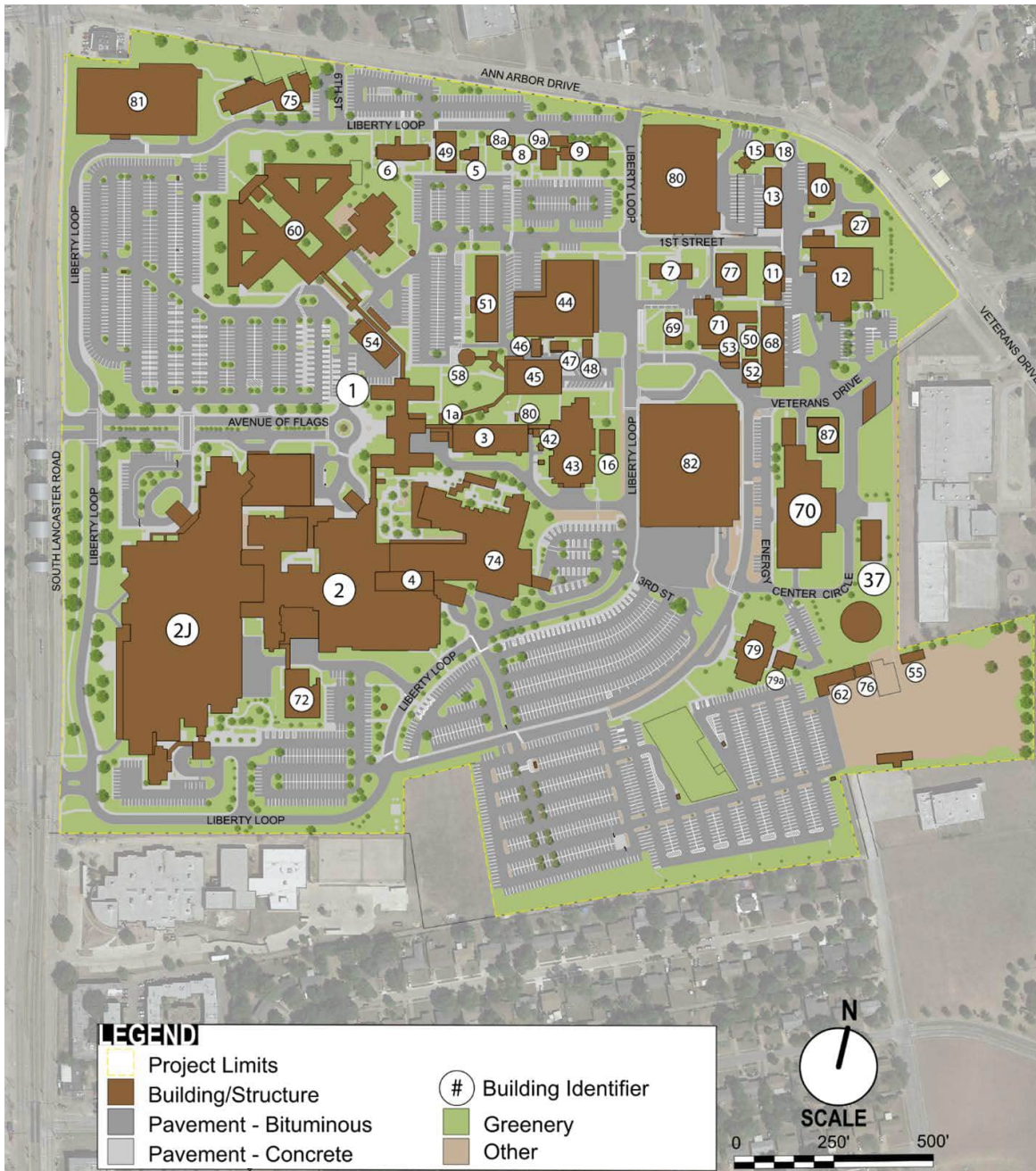


Figure 2 – Dallas VAMC with the APE indicated in yellow

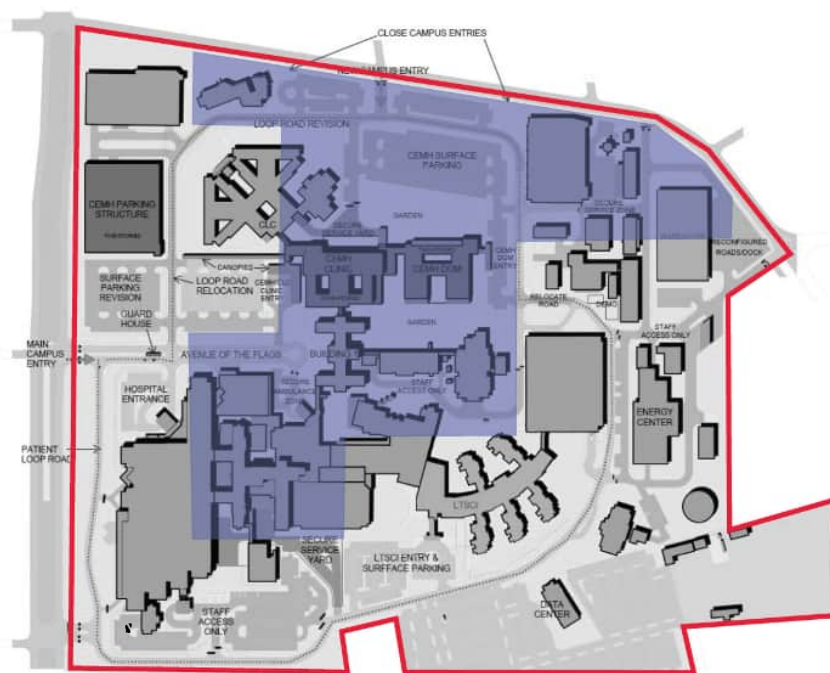


### Identification of Historic Properties

*Built Resources* - There are 54 built resources currently on the grounds of the Dallas VAMC. Since 2010, when VANTHCS first initiated consultation related to this Undertaking, VA has conducted two nationwide studies of its twentieth century hospitals resulting in historic contexts reviewed and approved by the Keeper of the National Register of Historic Places. VANTHCS has determined, based on a reassessment of existing built resources of the Dallas VAMC, that only Building 1, with Building 3 as an associated component, retains sufficient integrity and possesses the significance necessary to be individually listed in the National Register of Historic Properties. The remaining built resources were determined not eligible not eligible for listing in the National Register.

*Archaeological Resources* - Archaeological investigations in 2010 identified Site 41DL499 along the northern border of the Dallas VAMC (Figure 3). Twelve of the fifteen shovel tests contained cultural materials. These materials related to the farmstead predating the construction of the campus and the tenure of VA and its predecessor at the Dallas VAMC. Investigations were limited to 1.2 acres of the campus.<sup>1</sup> In 2011, the THC concurred the site had little research potential and was not eligible for listing in the National Register of Historic Places. In 2011, the site was revisited and additional ground near the engineering buildings investigated. This effort determined the portions of the site investigated held no potential due to the extensive ground disturbances in the area from site development.<sup>2</sup>

**FIGURE 3 - THE BLUE SHADED AREA REPRESENTS THE APPROXIMATE BOUNDARIES OF SITE 41DL499.**



*Figure 3 – The blue shaded area represents the approximate boundaries of Site 41DL499*

<sup>1</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049901, May 10, 2010.

<sup>2</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049902, October 24, 2011.

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

### Assessment of Adverse Effect

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

Upgrades to existing utilities are unlikely to produce adverse effects because the existing corridors were disturbed during installation and again during any work since their initial installation. Improvements requiring work in new areas or expansion of existing corridors into previously undisturbed areas has the potential to affect intact deposits, if any are present. Resurfacing of existing roadways is unlikely to disturb archaeological resources, however, construction of new road paths or removal of existing roads could disturb intact deposits, if any are present.

The effects of construction – noise, temporary alteration of campus roadways, installation of staging areas and trailers on existing hardscape – are temporary.

*CEMH* - VANTHCS has not finalized a design for CEMH facilities, including associated utilities and roadway improvements, and therefore the full range of effects on historic properties cannot be fully determined at this time. There is potential for the design to affect Building 1, both directly and indirectly.

*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. As seen in Figure 1, there are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

### Consultation

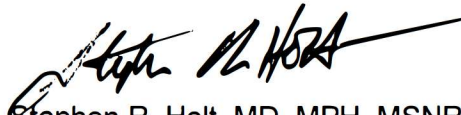
VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects. VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually. Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Page 7

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Holt", with a long horizontal flourish extending to the right.

Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosure

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission





## U.S. Department of Veterans Affairs

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

Martina Minthorn  
Tribal Historic Preservation Officer  
Comanche Nation  
6 SW D Avenue  
Lawton, OK 73502

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear THPO Minthorn:

From 2010 to 2013, the U.S. Department of Veterans Affairs VA North Texas Health Care System (VANTHCS) consulted in accordance with the National Historic Preservation Act (54 USC 300101 et seq.), specifically 54 USC § 306108, and 36 CFR Part 800 (collectively "Section 106") to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at Dallas VA Medical Center (VAMC) (THC Project No. VA/106/201102288). Component projects of this Undertaking included construction of a medical building and a parking garage for the CEMH and a medical building, parking garage, and warehouse for the LTSCI. The proposed construction would have resulted in the demolition of Buildings 5, 6, 8, 9, 10, 12, and 27, and necessitated improvements to the campus roadways and circulation system. VANTHCS determined this Undertaking would adversely affect historic properties and consultation to resolve adverse effects resulted in the execution of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* on January 22, 2013 (2013 MOA). VANTHCS extended the 2013 MOA in December 2017 to provide more time to implement the Undertaking. The proposed construction has been delayed due to funding cycles and, to date, only the LTSCI parking garage has been built.

VA continually seeks to improve its facility design to meet the needs of Veterans and current standards of medical care. As a result, while the design of the LTSCI facility is largely complete and similar to the design proposed in 2010, the design of the CEMH facility is in development due to recent changes in VA's mental health space requirements. Given the state of the CEMH design and the need to phase assessment of adverse effects, VANTHCS proposes to consult with appropriate agencies, Tribes, and organizations in accordance with 36 CFR

*Corporate Office:* Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, TX 75216  
Sam Rayburn Memorial Veterans Center, 1201 East Ninth Street, Bonham, TX 75418  
Fort Worth Outpatient Clinic, 2201 SE Loop 820, Fort Worth, TX 76119  
Tyler VA Primary Care Clinic, 7916 S. Broadway Ave, Tyler, TX 75703  
Polk Street Annex Primary Care Clinic, 4243 S. Polk Street, Dallas, TX 75224  
Plano VA Outpatient Clinic, 3804 W, 15<sup>th</sup> Street, Plano, TX 75075  
Grand Prairie VA Outpatient Clinic, 2737 Sherman Drive, Grand Prairie, TX 75051  
Garland VA Medical Center, 2300 Marie Curie Boulevard, Garland, TX 75042



National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

§ 800.14(b), including § 800.14(b)(1)(ii), to develop a programmatic agreement (PA) to supersede the 2013 MOA.

Definition of the Undertaking

VANTHCS has determined larger, state -of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus to address the undersized facilities and operational deficiencies at the Dallas VAMC and to support the rapidly growing Veteran demand for health care services in the region. VANTHCS has determined that the Undertaking is the construction and operation of LTSCI and CEMH facilities with all utilities and infrastructure. The improvements would be conducted in phases over a period of approximately six years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

As part of the Undertaking, the primary components of the CEMH project are anticipated to include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, TT51, and Structure 58.
- Construction and operation of a new approximately 215,000-square-foot CEMH facility in the north-central portion of the campus. The CEMH would consolidate and expand mental health services provided at the campus. Design of the CEMH facility is in progress. It could consist of one large building or two adjacent, connected buildings, one containing a mental health clinic and one containing residences for mental health patients. It is anticipated that the CEMH facility would be three to four stories in height.
- Demolition of Buildings 5, 6, 8, 9 and TT49.
- Reconfiguration/relocation of Liberty Loop and the construction of surface parking lots for the CEMH in the northern portion of the campus. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.
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- Vacation of mental health space in Building 1. Renovation of the vacated space may be necessary to accommodate a new function, however, significant modifications are not anticipated at this time.

As part of this Undertaking, the primary components of the LTSCI project include:

- Demolition of the small east wing of Building 74.
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- Demolition of Buildings 10, 12, and 27.
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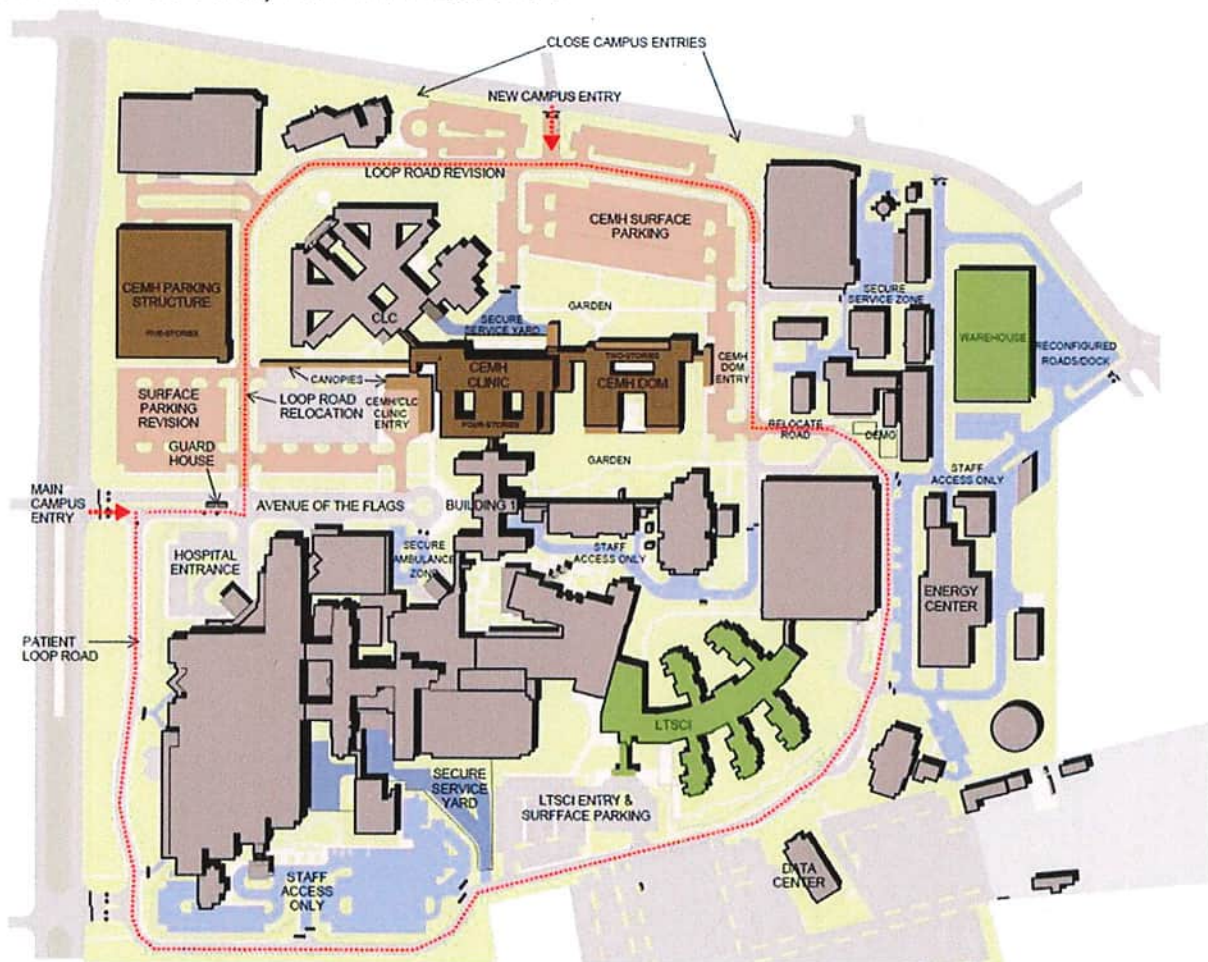


National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace the displaced laundry services.
- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development. A graphic depicting one concept is shown in Figure 1. This design concept is not final.

**FIGURE 1 - RENDERING OF THE DALLAS VAMC FOLLOWING CONSTRUCTION OF THE CEMH AND LTSCI FACILITIES. ALTHOUGH THE DESIGN OF THE LTSCI FACILITIES (SHOWN IN GREEN) IS LARGELY COMPLETE, THE DESIGN OF THE CEMH FACILITIES (SHOWN IN BROWN) IS IN DEVELOPMENT**



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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Delineation of the Area of Potential Effect (APE)

Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).

**FIGURE 2 – DALLAS VAMC WITH THE APE INDICATED IN YELLOW**

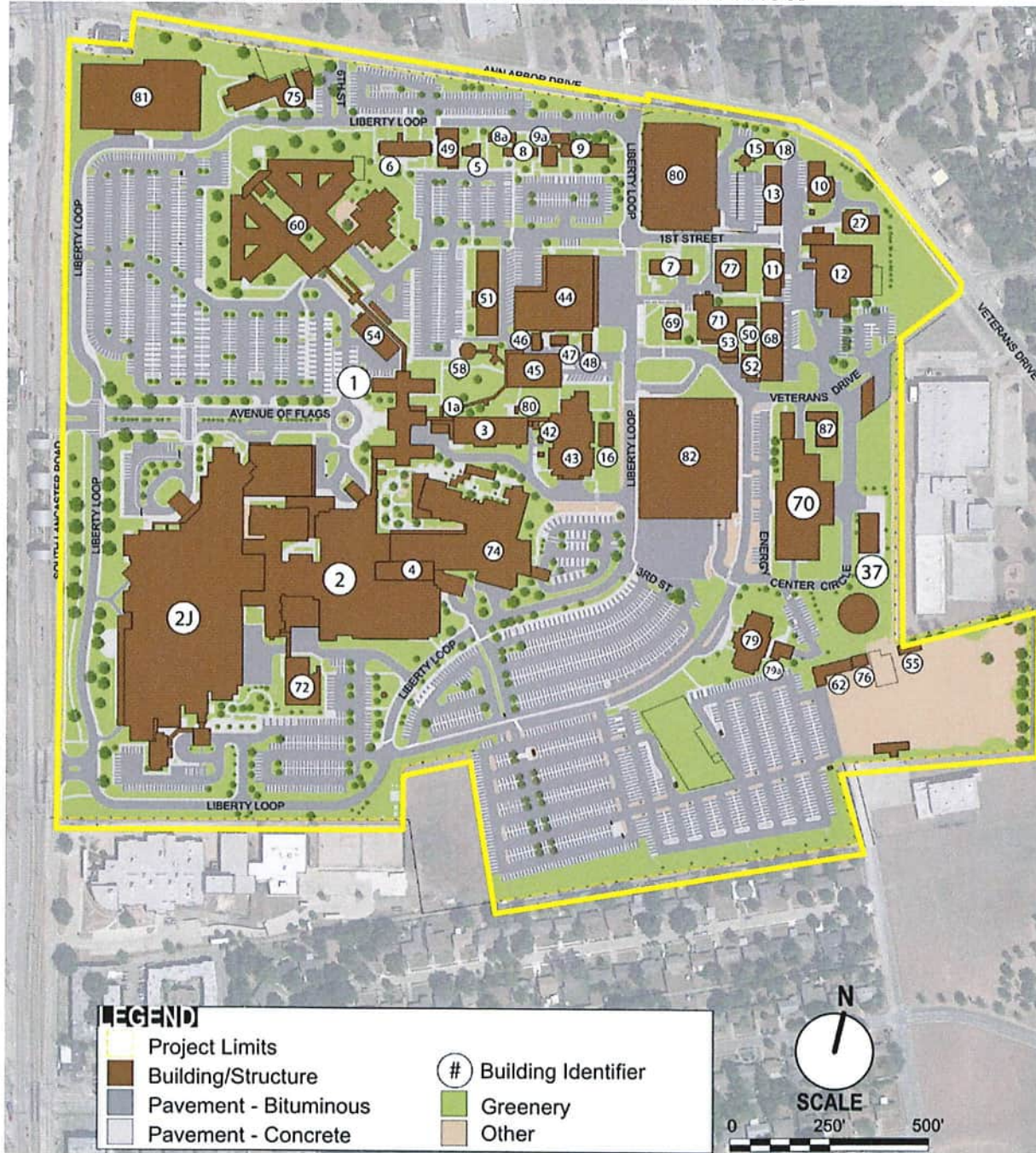


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### Identification of Historic Properties

*Built Resources* - There are 54 built resources currently on the grounds of the Dallas VAMC. Since 2010, when VANTHCS first initiated consultation related to this Undertaking, VA has conducted two nationwide studies of its twentieth century hospitals resulting in historic contexts reviewed and approved by the Keeper of the National Register of Historic Places. VANTHCS has determined, based on a reassessment of existing built resources of the Dallas VAMC, that only Building 1, with Building 3 as an associated component, retains sufficient integrity and possesses the significance necessary to be individually listed in the National Register of Historic Properties. The remaining built resources were determined not eligible not eligible for listing in the National Register.

*Archaeological Resources* - Archaeological investigations in 2010 identified Site 41DL499 along the northern border of the Dallas VAMC (Figure 3). Twelve of the fifteen shovel tests contained cultural materials. These materials related to the farmstead predating the construction of the campus and the tenure of VA and its predecessor at the Dallas VAMC. Investigations were limited to 1.2 acres of the campus.<sup>1</sup> In 2011, the THC concurred the site had little research potential and was not eligible for listing in the National Register of Historic Places. In 2011, the site was revisited and additional ground near the engineering buildings investigated. This effort determined the portions of the site investigated held no potential due to the extensive ground disturbances in the area from site development.<sup>2</sup>

**FIGURE 3 - THE BLUE SHADED AREA REPRESENTS THE APPROXIMATE BOUNDARIES OF SITE 41DL499.**



Figure 3 – The blue shaded area represents the approximate boundaries of Site 41DL499

<sup>1</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049901, May 10, 2010.

<sup>2</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049902, October 24, 2011.



National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

### Assessment of Adverse Effect

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

Upgrades to existing utilities are unlikely to produce adverse effects because the existing corridors were disturbed during installation and again during any work since their initial installation. Improvements requiring work in new areas or expansion of existing corridors into previously undisturbed areas has the potential to affect intact deposits, if any are present. Resurfacing of existing roadways is unlikely to disturb archaeological resources, however, construction of new road paths or removal of existing roads could disturb intact deposits, if any are present. The effects of construction – noise, temporary alteration of campus roadways, installation of staging areas and trailers on existing hardscape – are temporary.

*CEMH* - VANTHCS has not finalized a design for CEMH facilities, including associated utilities and roadway improvements, and therefore the full range of effects on historic properties cannot be fully determined at this time. There is potential for the design to affect Building 1, both directly and indirectly.

*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. As seen in Figure 1, there are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

### Consultation

VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects. VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually. Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Page 7

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Holt".

Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosure

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission





**U.S. Department of Veterans Affairs**

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

Dr. Linda Langley  
Tribal Historic Preservation Officer  
Coushatta Tribe of Louisiana  
P.O. Box 10  
Elton, LA 70532

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear Dr. Langley:

From 2010 to 2013, the U.S. Department of Veterans Affairs VA North Texas Health Care System (VANTHCS) consulted in accordance with the National Historic Preservation Act (54 USC 300101 et seq.), specifically 54 USC § 306108, and 36 CFR Part 800 (collectively "Section 106") to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at Dallas VA Medical Center (VAMC) (THC Project No. VA/106/201102288). Component projects of this Undertaking included construction of a medical building and a parking garage for the CEMH and a medical building, parking garage, and warehouse for the LTSCI. The proposed construction would have resulted in the demolition of Buildings 5, 6, 8, 9, 10, 12, and 27, and necessitated improvements to the campus roadways and circulation system. VANTHCS determined this Undertaking would adversely affect historic properties and consultation to resolve adverse effects resulted in the execution of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* on January 22, 2013 (2013 MOA). VANTHCS extended the 2013 MOA in December 2017 to provide more time to implement the Undertaking. The proposed construction has been delayed due to funding cycles and, to date, only the LTSCI parking garage has been built.

VA continually seeks to improve its facility design to meet the needs of Veterans and current standards of medical care. As a result, while the design of the LTSCI facility is largely complete and similar to the design proposed in 2010, the design of the CEMH facility is in development due to recent changes in VA's mental health space requirements. Given the state of the CEMH design and the need to phase assessment of adverse effects, VANTHCS proposes to consult with appropriate agencies, Tribes, and organizations in accordance with 36 CFR § 800.14(b), including § 800.14(b)(1)(ii), to develop a programmatic agreement (PA) to

*Corporate Office:* Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, TX 75216  
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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

### Definition of the Undertaking

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As part of the Undertaking, the primary components of the CEMH project are anticipated to include:

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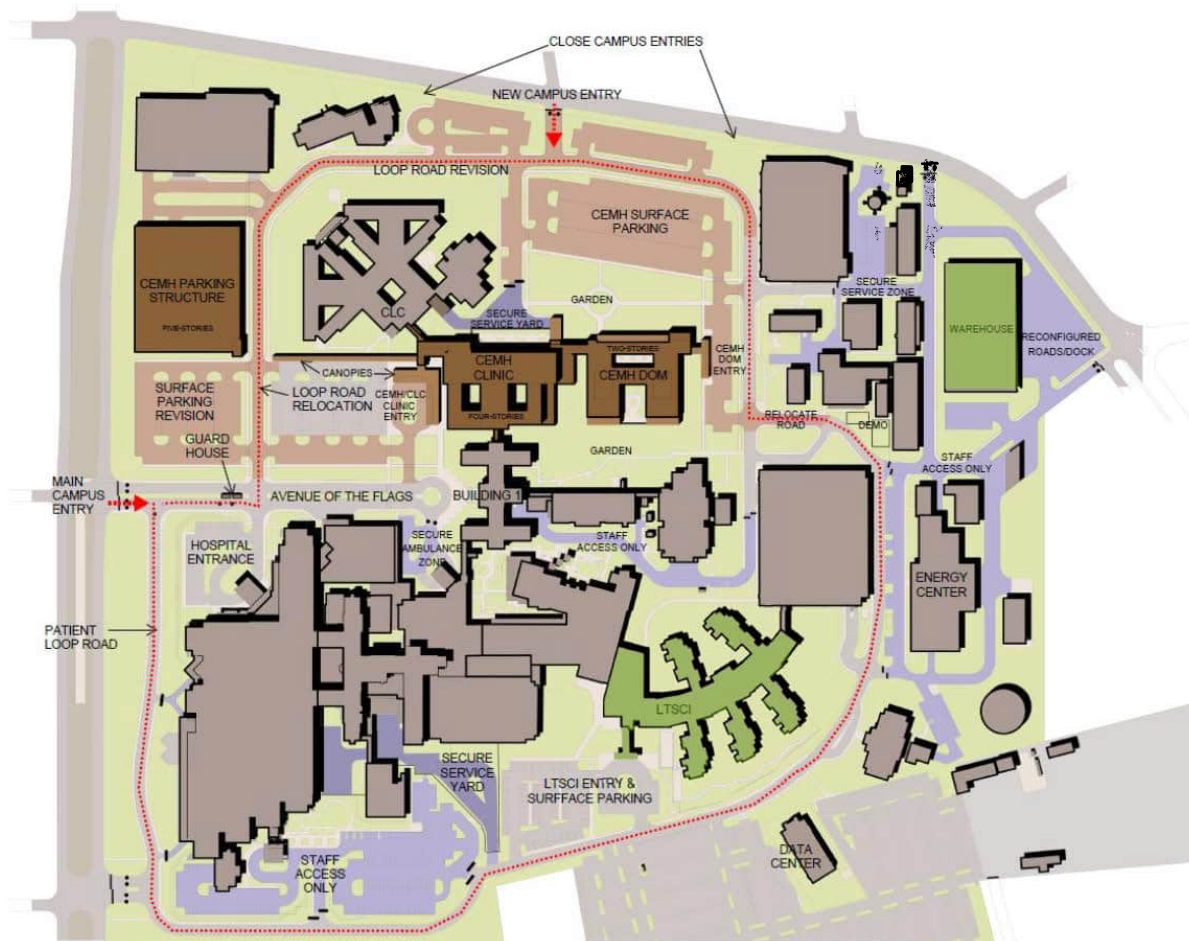
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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

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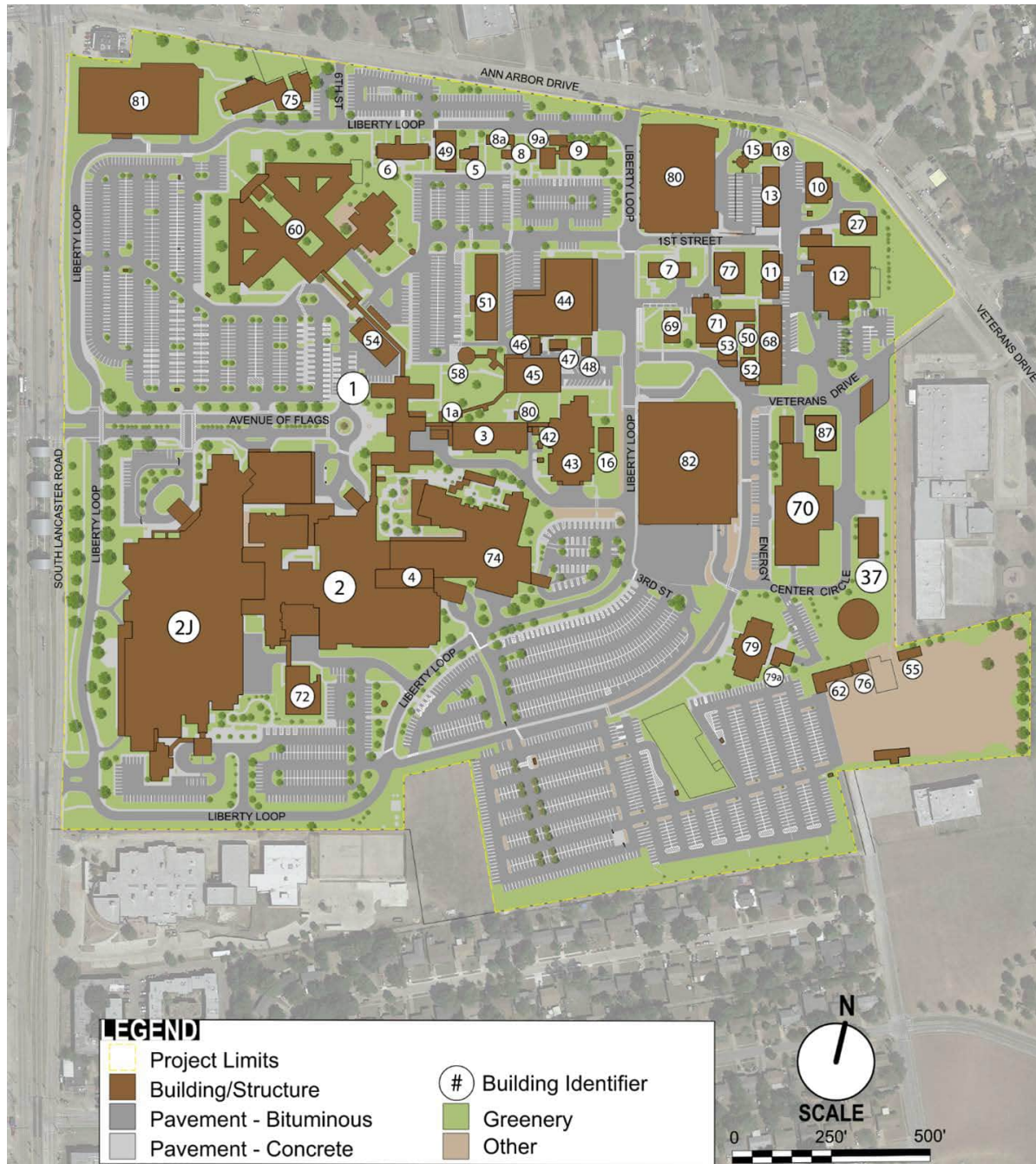


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### **ASSESSMENT OF ADVERSE EFFECT**

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

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### **Consultation**

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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Holt", written in a cursive style.

Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosures

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission



**U.S. Department of Veterans Affairs**

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

Lauren Brown  
Tribal Historic Preservation Officer  
Tonkawa Tribe  
1 Rush Buffalo Road  
Tonkawa, OK 74653

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear THPO Brown:

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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

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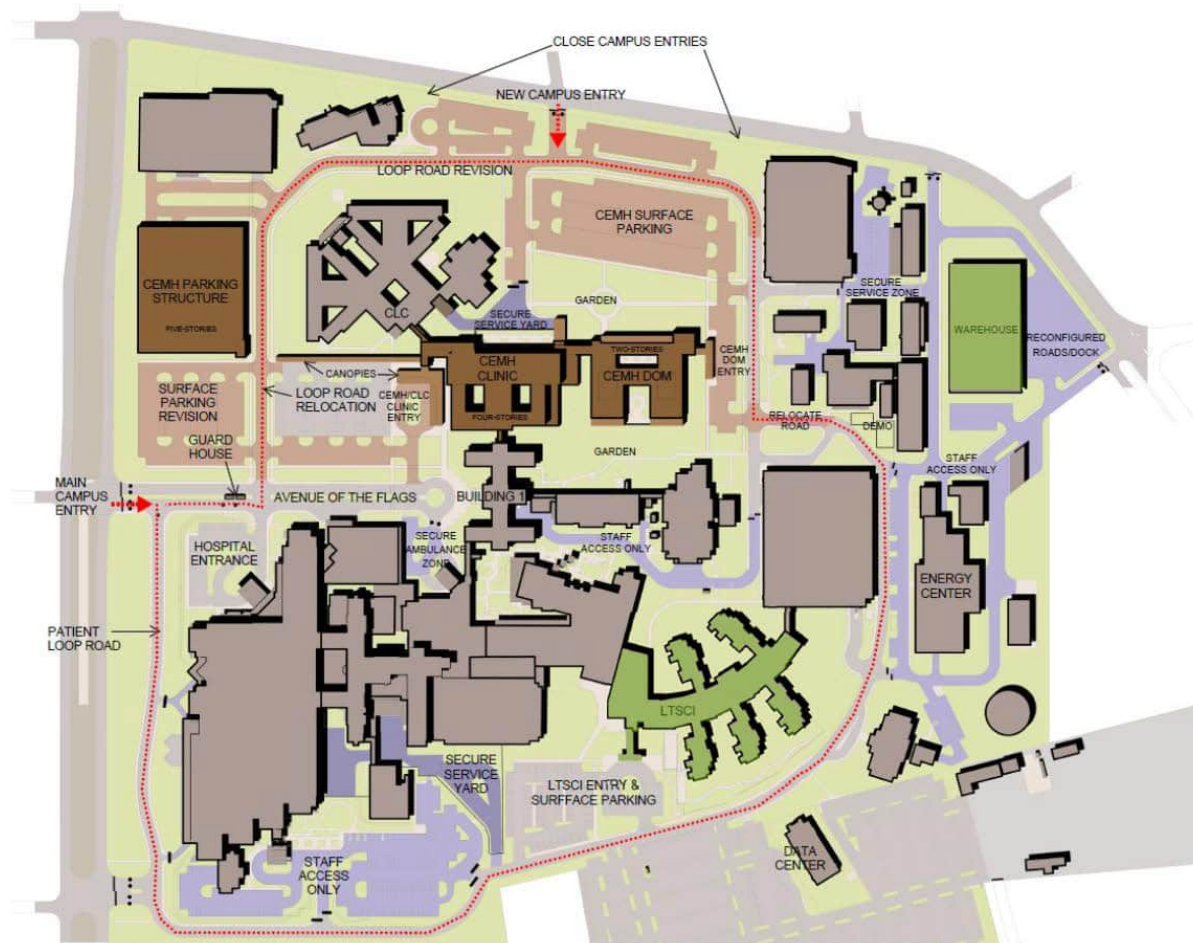
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- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse.
- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace the displaced laundry services.
- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development. A graphic depicting one concept is shown in Figure 1. This design concept is not final.

**FIGURE 1 - RENDERING OF THE DALLAS VAMC FOLLOWING CONSTRUCTION OF THE CEMH AND LTSCI FACILITIES. ALTHOUGH THE DESIGN OF THE LTSCI FACILITIES (SHOWN IN GREEN) IS LARGELY COMPLETE, THE DESIGN OF THE CEMH FACILITIES (SHOWN IN BROWN) IS IN DEVELOPMENT**



*Figure 1 – Rendering of the Dallas VAMC following construction of the CEMH and LTSCI facilities. Although the design of the LTSCI facilities (shown in green) is largely complete, the design of the CEMH facilities (shown in brown) is in development.*



National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Delineation of the Area of Potential Effect (APE)

Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).

**FIGURE 2 – DALLAS VAMC WITH THE APE INDICATED IN YELLOW**

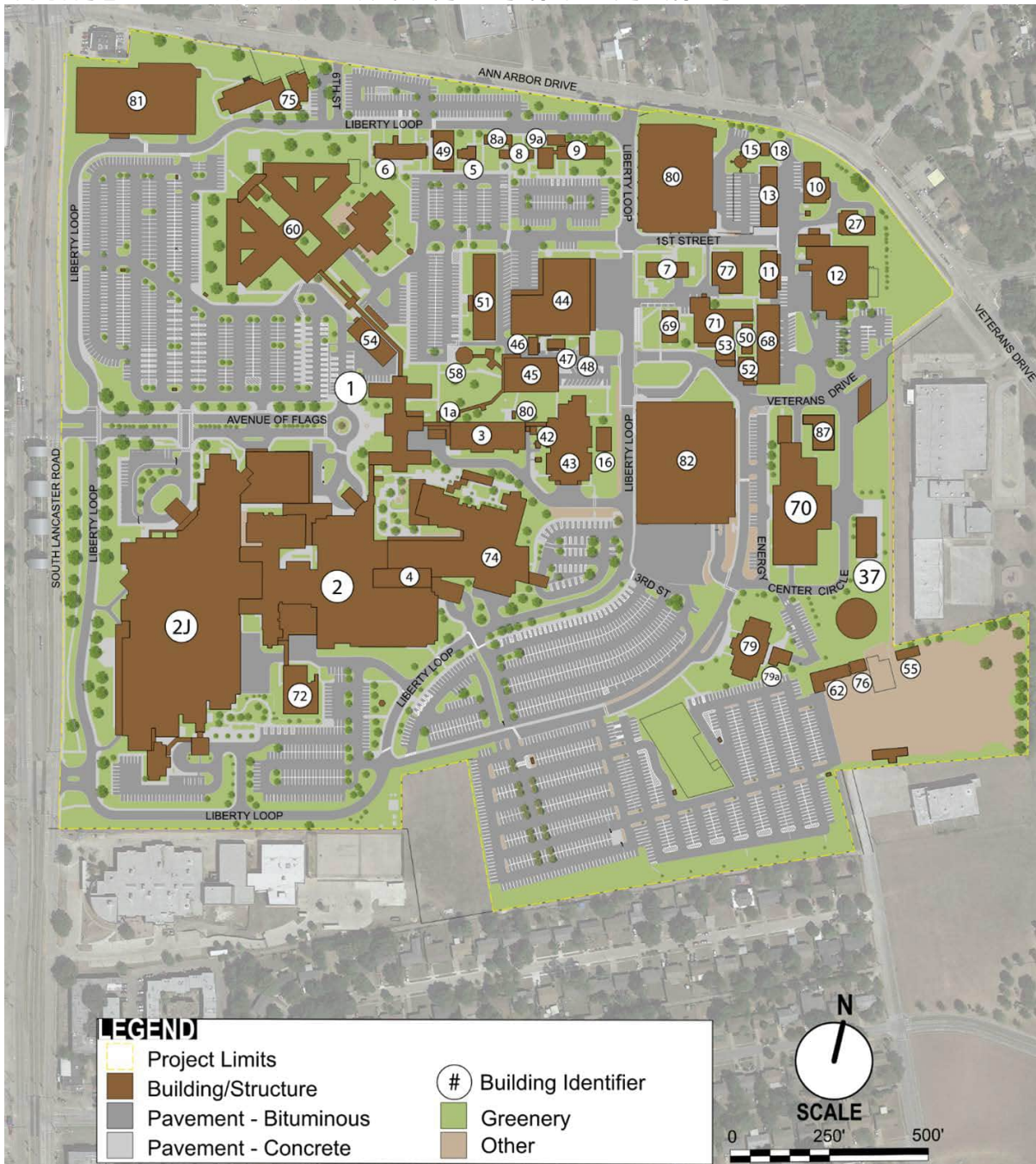


Figure 2 – Dallas VAMC with the APE indicated in yellow

***Built Resources*** - There are 54 built resources currently on the grounds of the Dallas VAMC. Since 2010, when VANTHCS first initiated consultation related to this Undertaking, VA has conducted two nationwide studies of its twentieth century hospitals resulting in historic contexts reviewed and approved by the Keeper of the National Register of Historic Places. VANTHCS has determined, based on a reassessment of existing built resources of the Dallas VAMC, that only Building 1, with Building 3 as an associated component, retains sufficient integrity and possesses the significance necessary to be individually listed in the National Register of Historic Properties. The remaining built resources were determined not eligible for listing in the National Register.

*Archaeological Resources* - Archaeological investigations in 2010 identified Site 41DL499 along the northern border of the Dallas VAMC (Figure 3). Twelve of the fifteen shovel tests contained cultural materials. These materials related to the farmstead predating the construction of the campus and the tenure of VA and its predecessor at the Dallas VAMC. Investigations were limited to 1.2 acres of the campus.<sup>1</sup> In 2011, the THC concurred the site had little research potential and was not eligible for listing in the National Register of Historic Places. In 2011, the site was revisited and additional ground near the engineering buildings investigated. This effort determined the portions of the site investigated held no potential due to the extensive ground disturbances in the area from site development.<sup>2</sup>

**FIGURE 3 - THE BLUE SHADED AREA REPRESENTS THE APPROXIMATE BOUNDARIES OF SITE 41DL499.**



<sup>1</sup> Steven Hunt, Site 41DL499, Atas No. 9113049901, May 10, 2010.

<sup>2</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049902, October 24, 2011.

### Assessment of Adverse Effect

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

Upgrades to existing utilities are unlikely to produce adverse effects because the existing corridors were disturbed during installation and again during any work since their initial installation. Improvements requiring work in new areas or expansion of existing corridors into previously undisturbed areas has the potential to affect intact deposits, if any are present. Resurfacing of existing roadways is unlikely to disturb archaeological resources, however, construction of new road paths or removal of existing roads could disturb intact deposits, if any are present.

The effects of construction – noise, temporary alteration of campus roadways, installation of staging areas and trailers on existing hardscape – are temporary.

*CEMH* - VANTHCS has not finalized a design for CEMH facilities, including associated utilities and roadway improvements, and therefore the full range of effects on historic properties cannot be fully determined at this time. There is potential for the design to affect Building 1, both directly and indirectly.

*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. As seen in Figure 1, there are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

### Consultation

VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects.



Page 7

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually. Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Holt".

Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosure

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission





**U.S. Department of Veterans Affairs**

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

Mary Botone  
Section 106  
Wichita & Affiliated Tribes  
P.O. Box 729  
Anadarko, OK 73005

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear Ms. Botone:

From 2010 to 2013, the U.S. Department of Veterans Affairs (VA) North Texas Health Care System (NTHCS) consulted in accordance with the National Historic Preservation Act (54 USC 300101 et seq.), specifically 54 USC § 306108, and 36 CFR Part 800 (collectively "Section 106") to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at Dallas VA Medical Center (VAMC) (THC Project No. VA/106/201102288). Component projects of this Undertaking included construction of a medical building and a parking garage for the CEMH and a medical building, parking garage, and warehouse for the LTSCI. The proposed construction would have resulted in the demolition of Buildings 5, 6, 8, 9, 10, 12, and 27, and necessitated improvements to the campus roadways and circulation system. VANTHCS determined this Undertaking would adversely affect historic properties and consultation to resolve adverse effects resulted in the execution of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* on January 22, 2013 (2013 MOA). VANTHCS extended the 2013 MOA in December 2017 to provide more time to implement the Undertaking. The proposed construction has been delayed due to funding cycles and, to date, only the LTSCI parking garage has been built.

VA continually seeks to improve its facility design to meet the needs of Veterans and current standards of medical care. As a result, while the design of the LTSCI facility is largely complete and similar to the design proposed in 2010, the design of the CEMH facility is in development due to recent changes in VA's mental health space requirements. Given the state of the CEMH design and the need to phase assessment of adverse effects, VANTHCS proposes to consult with appropriate agencies, Tribes, and organizations in accordance with

*Corporate Office:* Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, TX 75216  
Sam Rayburn Memorial Veterans Center, 1201 East Ninth Street, Bonham, TX 75418  
Fort Worth Outpatient Clinic, 2201 SE Loop 820, Fort Worth, TX 76119  
Tyler VA Primary Care Clinic, 7916 S. Broadway Ave, Tyler, TX 75703  
Polk Street Annex Primary Care Clinic, 4243 S. Polk Street, Dallas, TX 75224  
Plano VA Outpatient Clinic, 3804 W, 15<sup>th</sup> Street, Plano, TX 75075  
Grand Prairie VA Outpatient Clinic, 2737 Sherman Drive, Grand Prairie, TX 75051  
Garland VA Medical Center, 2300 Marie Curie Boulevard, Garland, TX 75042

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

36 CFR § 800.14(b), including § 800.14(b)(1)(ii), to develop a programmatic agreement (PA) to supersede the 2013 MOA.

#### Definition of the Undertaking

VANTHCS has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus to address the undersized facilities and operational deficiencies at the Dallas VAMC and to support the rapidly growing Veteran demand for health care services in the region. VANTHCS has determined that the Undertaking is the construction and operation of LTSCI and CEMH facilities with all utilities and infrastructure. The improvements would be conducted in phases over a period of approximately six years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

As part of the Undertaking, the primary components of the CEMH project are anticipated to include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, TT51, and Structure 58.
- Construction and operation of a new approximately 215,000-square-foot CEMH facility in the north-central portion of the campus. The CEMH would consolidate and expand mental health services provided at the campus. Design of the CEMH facility is in progress. It could consist of one large building or two adjacent, connected buildings, one containing a mental health clinic and one containing residences for mental health patients. It is anticipated that the CEMH facility would be three to four stories in height.
- Demolition of Buildings 5, 6, 8, 9 and TT49.
- Reconfiguration/relocation of Liberty Loop and the construction of surface parking lots for the CEMH in the northern portion of the campus. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.
- Construction and operation of a new approximately 1,000-car, up to 5-story parking garage associated with the CEMH facility in the northwestern portion of the campus, in the northern portion of current Parking Lot 1.
- Vacation of mental health space in Building 1. Renovation of the vacated space may be necessary to accommodate a new function, however, significant modifications are not anticipated at this time.

As part of this Undertaking, the primary components of the LTSCI project include:

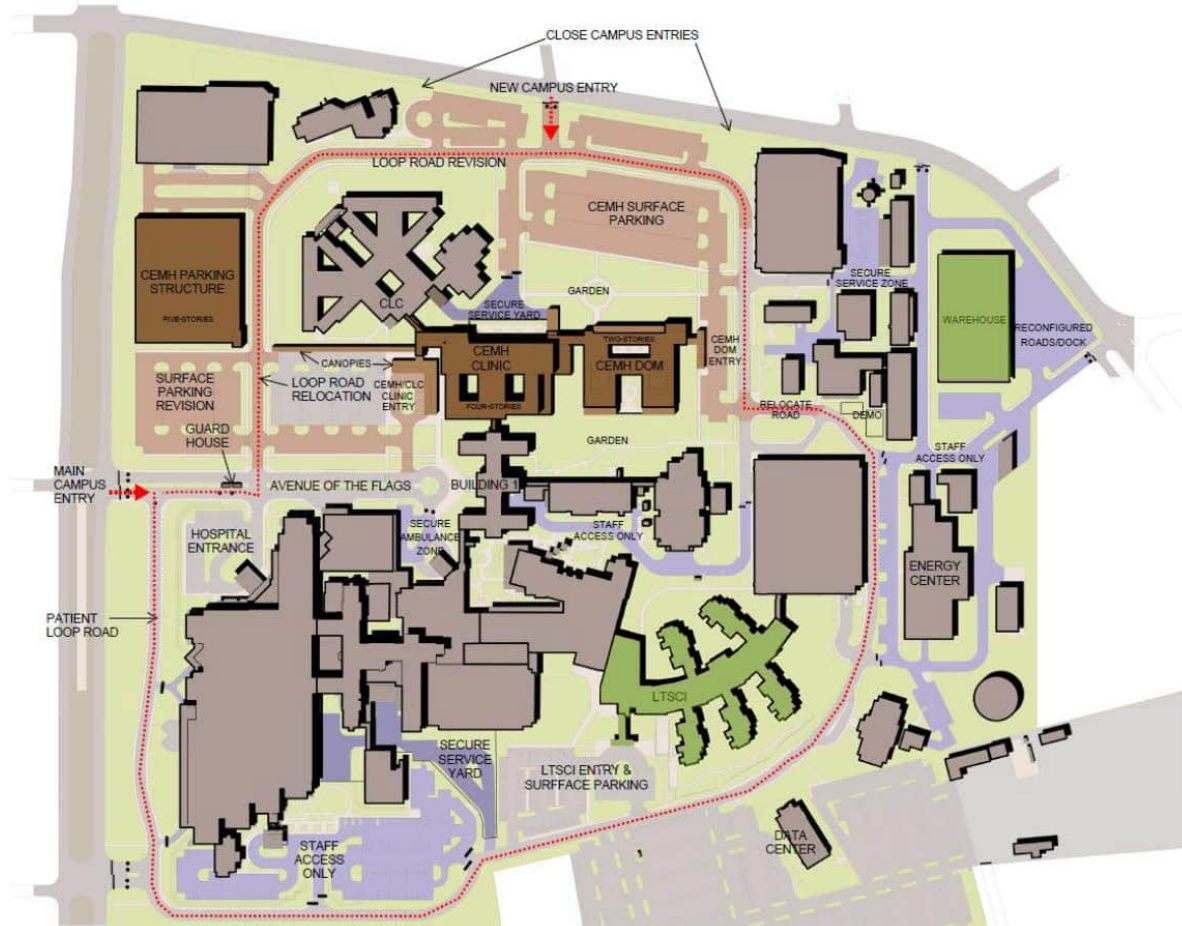
- Demolition of the small east wing of Building 74.
- Construction and operation a new approximately 172,000-square-foot, three-story (plus basement) LTSCI facility in the southeastern portion of the campus, adjacent to Building 74, in the location of the to be demolished eastern wing of Building 74. The LTSCI would provide residences for Veterans with long-term spinal cord injuries and would house an Outpatient Spinal Cord Injury Clinic and physical/occupational therapy facilities.
- Demolition of Buildings 10, 12, and 27.
- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse.

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace the displaced laundry services.
- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development. A graphic depicting one concept is shown in Figure 1. This design concept is not final.

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Delineation of the Area of Potential Effect (APE)

Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).

**FIGURE 2 – DALLAS VAMC WITH THE APE INDICATED IN YELLOW**

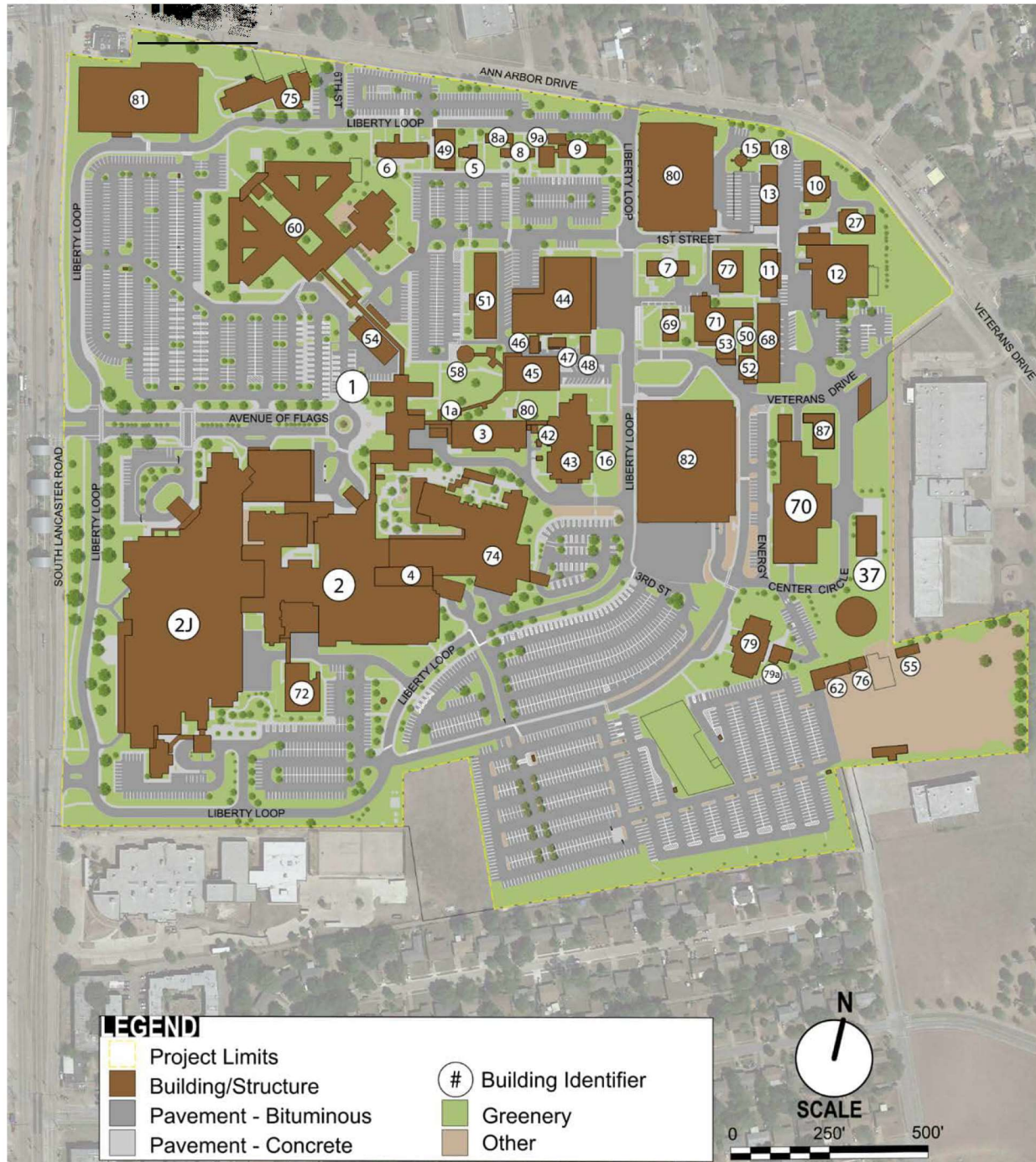


Figure 2 – Dallas VAMC with the APE indicated in yellow



### Identification of Historic Properties

**Built Resources** - There are 54 built resources currently on the grounds of the Dallas VAMC. Since 2010, when VANTHCS first initiated consultation related to this Undertaking, VA has conducted two nationwide studies of its twentieth century hospitals resulting in historic contexts reviewed and approved by the Keeper of the National Register of Historic Places. VANTHCS has determined, based on a reassessment of existing built resources of the Dallas VAMC, that only Building 1, with Building 3 as an associated component, retains sufficient integrity and possesses the significance necessary to be individually listed in the National Register of Historic Properties. The remaining built resources were determined not eligible not eligible for listing in the National Register.

**Archaeological Resources** - Archaeological investigations in 2010 identified Site 41DL499 along the northern border of the Dallas VAMC (Figure 3). Twelve of the fifteen shovel tests contained cultural materials. These materials related to the farmstead predating the construction of the campus and the tenure of VA and its predecessor at the Dallas VAMC. Investigations were limited to 1.2 acres of the campus.<sup>1</sup> In 2011, the THC concurred the site had little research potential and was not eligible for listing in the National Register of Historic Places. In 2011, the site was revisited and additional ground near the engineering buildings investigated. This effort determined the portions of the site investigated held no potential due to the extensive ground disturbances in the area from site development.<sup>2</sup>

**FIGURE 3 - THE BLUE SHADED AREA REPRESENTS THE APPROXIMATE BOUNDARIES OF SITE 41DL499.**

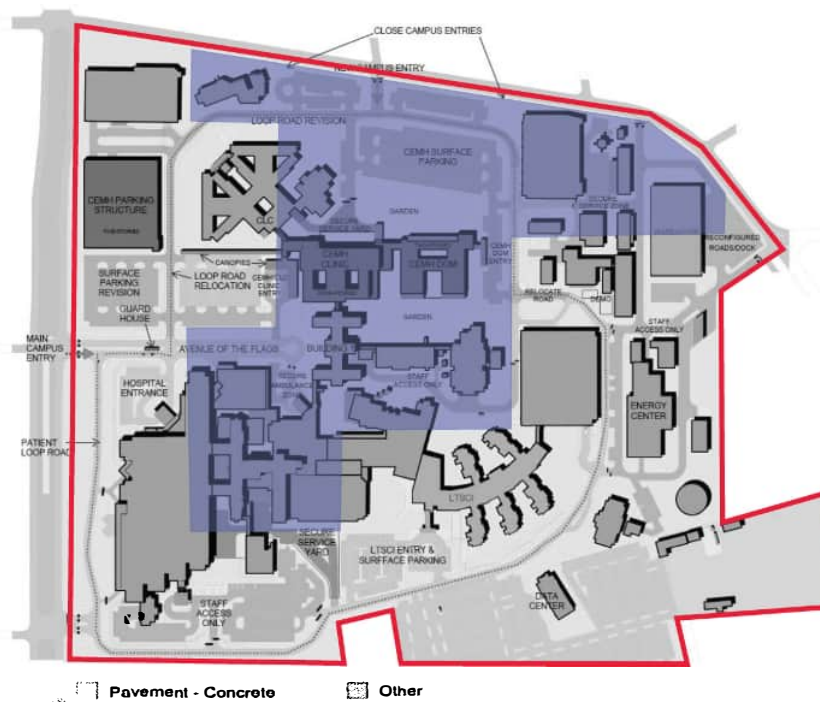


Figure 3 – The blue shaded area represents the approximate boundaries of Site 41DL499

<sup>1</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049901, May 10, 2010.

<sup>2</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049902, October 24, 2011.

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

Upgrades to existing utilities are unlikely to produce adverse effects because the existing corridors were disturbed during installation and again during any work since their initial installation. Improvements requiring work in new areas or expansion of existing corridors into previously undisturbed areas has the potential to affect intact deposits, if any are present. Resurfacing of existing roadways is unlikely to disturb archaeological resources, however, construction of new road paths or removal of existing roads could disturb intact deposits, if any are present.

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*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. As seen in Figure 1, there are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

### Consultation

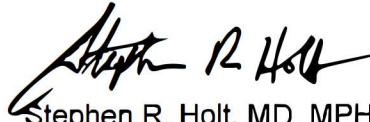
VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects. VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually. Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Page 7

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Holt". The signature is fluid and cursive, with the first name "Stephen" and last name "Holt" clearly distinguishable.

Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosure

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission



**U.S. Department of Veterans Affairs**

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

Mr. Murray Miller  
Director  
City of Dallas Office of Historic Preservation  
Dallas Certified Local Government  
1500 Marilla  
Room 5BN  
Dallas, Texas 75201  
Via email: [Murray.Miller@dallascityhall.com](mailto:Murray.Miller@dallascityhall.com)

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear Director Miller:

From 2010 to 2013, the U.S. Department of Veterans Affairs VA North Texas Health Care System (VANTHCS) consulted in accordance with the National Historic Preservation Act (54 USC 300101 et seq.), specifically 54 USC § 306108, and 36 CFR Part 800 (collectively "Section 106") to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at Dallas VA Medical Center (VAMC). Component projects of this Undertaking included construction of a medical building and a parking garage for the CEMH and a medical building, parking garage, and warehouse for the LTSCI. The proposed construction would have resulted in the demolition of Buildings 5, 6, 8, 9, 10, 12, and 27, and necessitated improvements to the campus roadways and circulation system. VANTHCS determined this Undertaking would adversely affect historic properties and consultation to resolve adverse effects resulted in the execution of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* on January 22, 2013 (2013 MOA). VANTHCS extended the 2013 MOA in December 2017 to provide more time to implement the Undertaking. The proposed construction has been delayed due to funding cycles and, to date, only the LTSCI parking garage has been built.

VA continually seeks to improve its facility design to meet the needs of Veterans and current standards of medical care. As a result, while the design of the LTSCI facility is largely complete and similar to the design proposed in 2010, the design of the CEMH facility is in development due to recent changes in VA's mental health space requirements. Given the state of the CEMH design

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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

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Definition of the Undertaking

VANTHCS has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus to address the undersized facilities and operational deficiencies at the Dallas VAMC and to support the rapidly growing Veteran demand for health care services in the region. VANTHCS has determined that the Undertaking is the construction and operation of LTSCI and CEMH facilities with all utilities and infrastructure. The improvements would be conducted in phases over a period of approximately six years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

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- Vacation of mental health space in Building 1. Renovation of the vacated space may be necessary to accommodate a new function, however, significant modifications are not anticipated at this time. If and when such plans are developed, VANTHCS will consult in accordance with 36 CFR Part 800.

As part of this Undertaking, the primary components of the LTSCI project include:

- Demolition of the small east wing of Building 74.
- Construction and operation a new approximately 172,000-square-foot, three-story (plus basement) LTSCI facility in the southeastern portion of the campus, adjacent to Building 74, in the location of the to be demolished eastern wing of Building 74. The LTSCI would

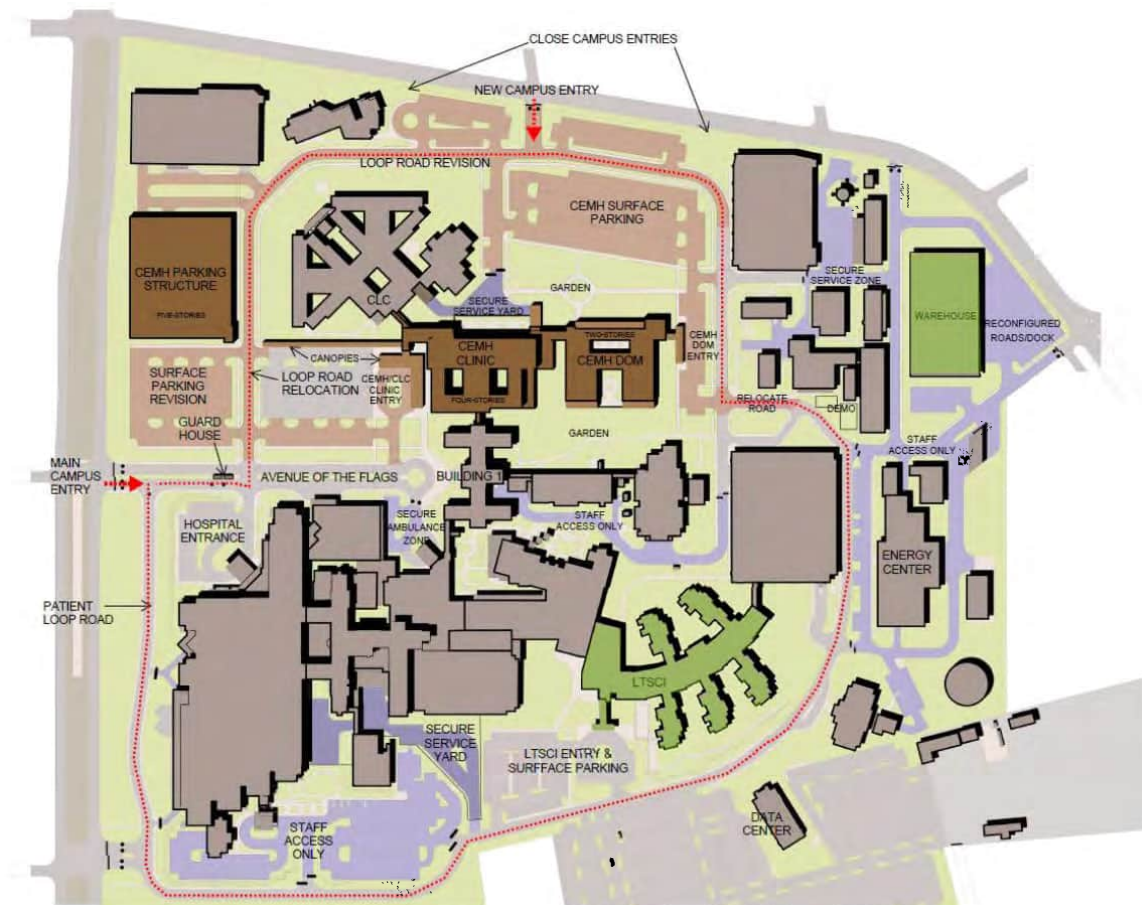
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- Demolition of Buildings 10, 12, and 27.
- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse.
- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace displaced laundry services.
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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Delineation of the Area of Potential Effect

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Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).

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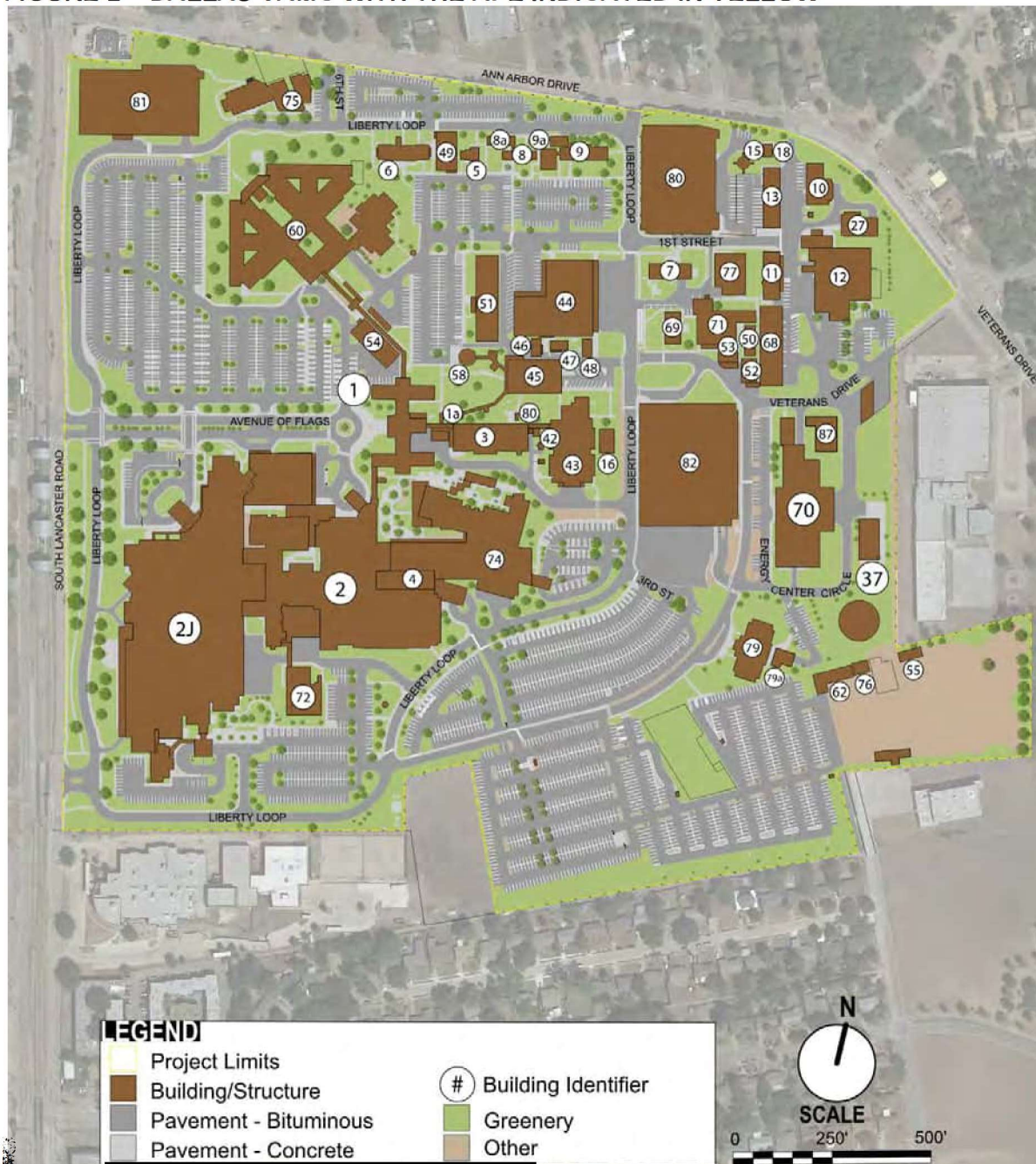


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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

### Identification of Historic Properties

*Built Resources* - There are 54 built resources currently on the grounds of the Dallas VAMC. Since 2010, when VANTHCS first initiated consultation related to this Undertaking, VA has conducted two nationwide studies of its twentieth century hospitals resulting in historic contexts reviewed and approved by the Keeper of the National Register of Historic Places. VANTHCS has determined, based on a reassessment of existing built resources of the Dallas VAMC, that only Building 1, with Building 3 as an associated component, retains sufficient integrity and possesses the significance necessary to be individually listed in the National Register of Historic Properties (Figure 3). The remaining built resources were determined not eligible not eligible for listing in the National Register.<sup>1</sup>

**FIGURE 3 – FAÇADE OF BUILDING 1, 2021**



*Figure 2 - Facade of Building 1, 2021*

*Archaeological Resources* - Archaeological investigations in 2010 identified Site 41DL499 along the northern border of the Dallas VAMC. In 2011, the THC concurred the site had little

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<sup>1</sup> Row 10 Historic Preservation Solutions, LLC, *Identification of Historic Properties Potentially Affected by the Proposed LRSCI and CEMh Projects, VA North Texas Health Care System, Dallas VA Medical Center*, October 13, 2021.



research potential and was not eligible for listing in the National Register of Historic Places. In 2011, the site was revisited and additional ground near the engineering buildings investigated. This effort determined the portions of the site investigated held no potential due to the extensive ground disturbances in the area from site development.<sup>2</sup>

#### Assessment of Adverse Effect

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

Upgrades to existing utilities are unlikely to produce adverse effects because the existing corridors were disturbed during installation and again during any work since their initial installation. Improvements requiring work in new areas or expansion of existing corridors into previously undisturbed areas has the potential to affect intact deposits, if any are present. Resurfacing of existing roadways is unlikely to disturb archaeological resources, however, construction of new road paths or removal of existing roads could disturb intact deposits, if any are present.

The effects of construction – noise, temporary alteration of campus roadways, installation of staging areas and trailers on existing hardscape – are temporary.

*CEMH* - VANTHCS has not finalized a design for CEMH facilities, including associated utilities and roadway improvements, and therefore the full range of effects on historic properties cannot be fully determined at this time. There is potential for the design to affect Building 1, both directly and indirectly.

*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. There are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

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<sup>2</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049902, October 24, 2011.

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Consultation

VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects. VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually. Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,



Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosures

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission



## U.S. Department of Veterans Affairs

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

David Preziosi, FAICP  
Executive Director  
Preservation Dallas  
2922 Swiss Avenue  
Dallas, Texas 75204-5928  
Via email: [admin@preservationdallas.org](mailto:admin@preservationdallas.org)

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear Director Preziosi:

From 2010 to 2013, the U.S. Department of Veterans Affairs VA North Texas Health Care System (NTHCS) consulted in accordance with the National Historic Preservation Act (54 USC 300101 et seq.), specifically 54 USC § 306108, and 36 CFR Part 800 (collectively "Section 106") to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at Dallas VA Medical Center (VAMC). Component projects of this Undertaking included construction of a medical building and a parking garage for the CEMH and a medical building, parking garage, and warehouse for the LTSCI. The proposed construction would have resulted in the demolition of Buildings 5, 6, 8, 9, 10, 12, and 27, and necessitated improvements to the campus roadways and circulation system. VANTHCS determined this Undertaking would adversely affect historic properties and consultation to resolve adverse effects resulted in the execution of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* on January 22, 2013 (2013 MOA). VANTHCS extended the 2013 MOA in December 2017 to provide more time to implement the Undertaking. The proposed construction has been delayed due to funding cycles and, to date, only the LTSCI parking garage has been built.

VA continually seeks to improve its facility design to meet the needs of Veterans and current standards of medical care. As a result, while the design of the LTSCI facility is largely complete and similar to the design proposed in 2010, the design of the CEMH facility is in development due to recent changes in VA's mental health space requirements. Given the state of the CEMH design and the need to phase assessment of adverse effects, VANTHCS proposes to consult with appropriate agencies, Tribes, and organizations in accordance with 36

*Corporate Office:* Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, TX 75216  
Sam Rayburn Memorial Veterans Center, 1201 East Ninth Street, Bonham, TX 75418  
Fort Worth Outpatient Clinic, 2201 SE Loop 820, Fort Worth, TX 76119  
Tyler VA Primary Care Clinic, 7916 S. Broadway Ave, Tyler, TX 75703  
Polk Street Annex Primary Care Clinic, 4243 S. Polk Street, Dallas, TX 75224  
Plano VA Outpatient Clinic, 3804 W, 15<sup>th</sup> Street, Plano, TX 75075  
Grand Prairie VA Outpatient Clinic, 2737 Sherman Drive, Grand Prairie, TX 75051  
Garland VA Medical Center, 2300 Marie Curie Boulevard, Garland, TX 75042

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

CFR § 800.14(b), including § 800.14(b)(1)(ii), to develop a programmatic agreement (PA) to supersede the 2013 MOA.

### Definition of the Undertaking

VANTHCS has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus to address the undersized facilities and operational deficiencies at the Dallas VAMC and to support the rapidly growing Veteran demand for health care services in the region. VANTHCS has determined that the Undertaking is the construction and operation of LTSCI and CEMH facilities with all utilities and infrastructure. The improvements would be conducted in phases over a period of approximately six years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

As part of the Undertaking, the primary components of the CEMH project are anticipated to include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, TT51, and Structure 58. These buildings and structures would be demolished to make space for the CEMH facility.
- Construction and operation of a new approximately 215,000-square-foot CEMH facility in the north-central portion of the campus. The CEMH would consolidate and expand mental health services provided at the campus. Design of the CEMH facility is in progress. It could consist of one large building or two adjacent, connected buildings, one containing a mental health clinic and one containing residences for mental health patients. It is anticipated that the CEMH facility would be three to four stories in height.
- Demolition of Buildings 5, 6, 8, 9 and TT49.
- Reconfiguration/relocation of Liberty Loop and the construction of surface parking lots for the CEMH in the northern portion of the campus, in the location of the to be demolished Buildings 5, 6, 8, 9 and TT49. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.
- Construction and operation of a new approximately 1,000-car, up to 5-story parking garage associated with the CEMH facility in the northwestern portion of the campus, in the northern portion of current Parking Lot 1.
- Vacation of mental health space in Building 1. Renovation of the vacated space may be necessary to accommodate a new function, however, significant modifications are not anticipated at this time. If and when such plans are developed, VANTHCS will consult in accordance with 36 CFR Part 800.

As part of this Undertaking, the primary components of the LTSCI project include:

- Demolition of the small east wing of Building 74.
- Construction and operation a new approximately 172,000-square-foot, three-story (plus basement) LTSCI facility in the southeastern portion of the campus, adjacent to Building 74, in the location of the to be demolished eastern wing of Building 74. The LTSCI would provide residences for Veterans with long-term spinal cord injuries and would house an Outpatient Spinal Cord Injury Clinic and physical/occupational therapy facilities.



National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

- Demolition of Buildings 10, 12, and 27.
- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse.

In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development. A graphic depicting one concept is shown in Figure 1. This design concept is not final.

**FIGURE 1 - RENDERING OF THE DALLAS VAMC FOLLOWING CONSTRUCTION OF THE CEMH AND LTSCI FACILITIES. ALTHOUGH THE DESIGN OF THE LTSCI FACILITIES (SHOWN IN GREEN) IS LARGELY COMPLETE, THE DESIGN OF THE CEMH FACILITIES (SHOWN IN BROWN) IS IN DEVELOPMENT**



*Figure 1 – Rendering of the Dallas VAMC following construction of the CEMH and LTSCI facilities. Although the design of the LTSCI facilities (shown in green) is largely complete, the design of the CEMH facilities (shown in brown) is in development.*

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Delineation of the Area of Potential Effect (APE)

Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).

**FIGURE 2 – DALLAS VAMC WITH THE APE INDICATED IN YELLOW**



Figure 2 – Dallas VAMC with the APE indicated in yellow



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*Archaeological Resources* - Archaeological investigations in 2010 identified Site 41DL499 along the northern border of the Dallas VAMC. In 2011, the THC concurred the site had little research potential and was not eligible for listing in the National Register of Historic Places. In 2011, the site was revisited and additional ground near the engineering buildings investigated. This effort determined the portions of

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Assessment of Adverse Effect

*Both LTSCI and CEMH* - Construction of the CEMH and LTSCI facilities has the potential to affect subsurface deposits. In some locations, ground disturbance will exceed depths of 15 feet. Additionally, the demolition of existing buildings has the potential to disturb intact deposits, if any are present, as brick and concrete are pulled from the ground. Given past eras of construction on the campus and the proposed general locations of the CEMH and LTSCI construction, it is unlikely that intact deposits are present within the areas proposed for ground disturbance.

Upgrades to existing utilities are unlikely to produce adverse effects because the existing corridors were disturbed during installation and again during any work since their initial installation. Improvements requiring work in new areas or expansion of existing corridors into previously undisturbed areas has the potential to affect intact deposits, if any are present. Resurfacing of existing roadways is unlikely to disturb archaeological resources, however, construction of new road paths or removal of existing roads could disturb intact deposits, if any are present.

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*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. There are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

Consultation

VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures to resolve adverse effects. VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually.

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Page 7

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Holt".

Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosure

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission



## U.S. Department of Veterans Affairs

Veterans Health Administration  
VA North Texas Health Care System

November 16, 2021

In Reply Refer To: 549/003

Juanita H Nãnez  
Chair  
Dallas County Historical Commission  
411 ELM Street, 3<sup>rd</sup> Floor  
Dallas, Texas 75202-3301  
Via email: [Rachel.Brown@DallasCounty.org](mailto:Rachel.Brown@DallasCounty.org)

Re: National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Dear Chair Nãnez:

From 2010 to 2013, the U.S. Department of Veterans Affairs VA North Texas Health Care System (VANTHCS) consulted in accordance with the National Historic Preservation Act (54 USC 300101 et seq.), specifically 54 USC § 306108, and 36 CFR Part 800 (collectively "Section 106") to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at Dallas VA Medical Center (VAMC). Component projects of this Undertaking included construction of a medical building and a parking garage for the CEMH and a medical building, parking garage, and warehouse for the LTSCI. The proposed construction would have resulted in the demolition of Buildings 5, 6, 8, 9, 10, 12, and 27, and necessitated improvements to the campus roadways and circulation system. VANTHCS determined this Undertaking would adversely affect historic properties and consultation to resolve adverse effects resulted in the execution of the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion of Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* on January 22, 2013 (2013 MOA). VANTHCS extended the 2013 MOA in December 2017 to provide more time to implement the Undertaking. The proposed construction has been delayed due to funding cycles and, to date, only the LTSCI parking garage has been built.

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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

800.14(b), including § 800.14(b)(1)(ii), to develop a programmatic agreement (PA) to supersede the 2013 MOA.

### Definition of the Undertaking

VANTHCS has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically LTSCI and CEMH services, are needed at the Dallas VAMC campus to address the undersized facilities and operational deficiencies at the Dallas VAMC and to support the rapidly growing Veteran demand for health care services in the region. VANTHCS has determined that the Undertaking is the construction and operation of LTSCI and CEMH facilities with all utilities and infrastructure. The improvements would be conducted in phases over a period of approximately six years to minimize campus disruption and to support continued campus operations. It is anticipated that the majority of the LTSCI construction activities would be completed prior to beginning the CEMH construction.

As part of the Undertaking, the primary components of the CEMH project are anticipated to include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, TT51, and Structure 58. These buildings and structures would be demolished to make space for the CEMH facility.
- Construction and operation of a new approximately 215,000-square-foot CEMH facility in the north-central portion of the campus. The CEMH would consolidate and expand mental health services provided at the campus. Design of the CEMH facility is in progress. It could consist of one large building or two adjacent, connected buildings, one containing a mental health clinic and one containing residences for mental health patients. It is anticipated that the CEMH facility would be three to four stories in height.
- Demolition of Buildings 5, 6, 8, 9 and TT49.
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- Construction and operation of a new approximately 1,000-car, up to 5-story parking garage associated with the CEMH facility in the northwestern portion of the campus, in the northern portion of current Parking Lot 1.
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As part of this Undertaking, the primary components of the LTSCI project include:

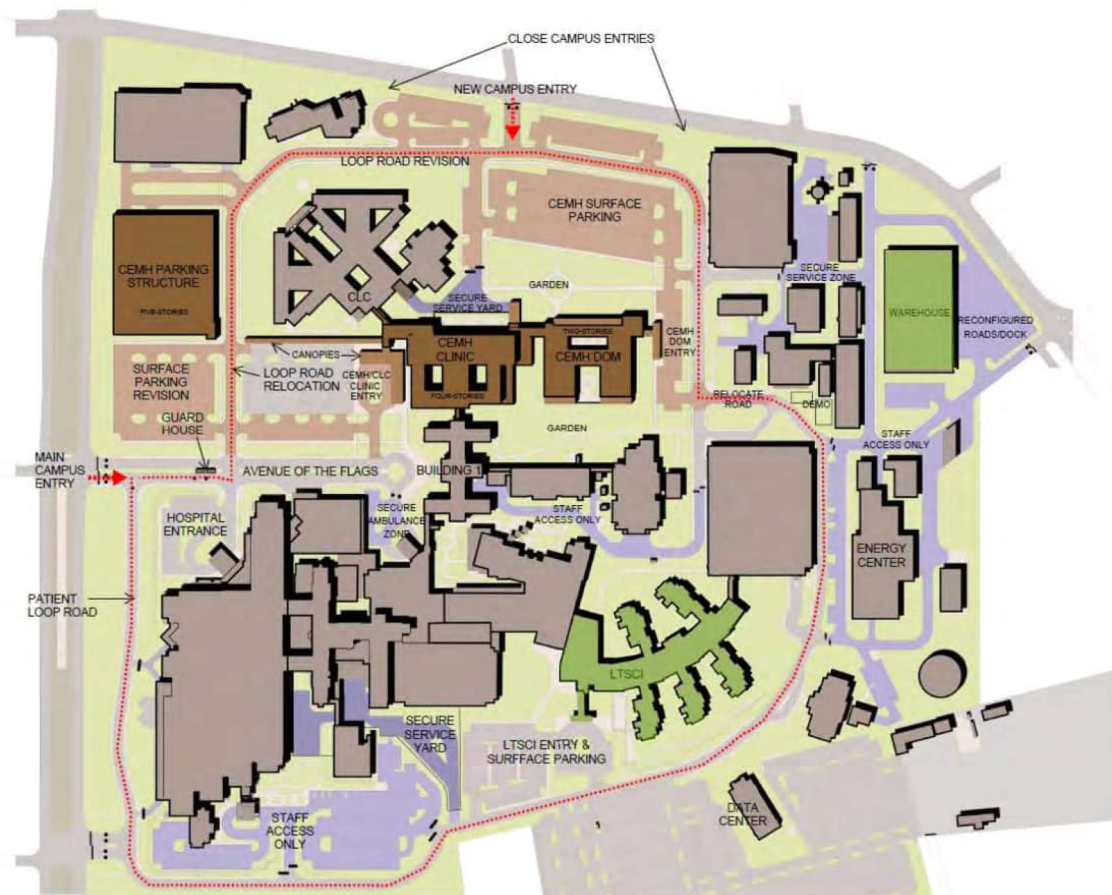
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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

- Demolition of Buildings 10, 12, and 27.
- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse.
- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace displaced laundry services.
- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development. A graphic depicting one concept is shown in Figure 1. This design concept is not final.

**FIGURE 1 - RENDERING OF THE DALLAS VAMC FOLLOWING CONSTRUCTION OF THE CEMH AND LTSCI FACILITIES. ALTHOUGH THE DESIGN OF THE LTSCI FACILITIES (SHOWN IN GREEN) IS LARGELY COMPLETE, THE DESIGN OF THE CEMH FACILITIES (SHOWN IN BROWN) IS IN DEVELOPMENT**



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National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Delineation of the Area of Potential Effect (APE)

Given the heights and locations of the proposed construction; the improvements to circulation patterns and roadways; the anticipated utility installations; and the uncertainty of the exact locations of such work, VANTHCS recommends the APE be the whole of the Dallas VAMC campus on South Lancaster Road (Figure 2).

**FIGURE 2 – DALLAS VAMC WITH THE APE INDICATED IN YELLOW**

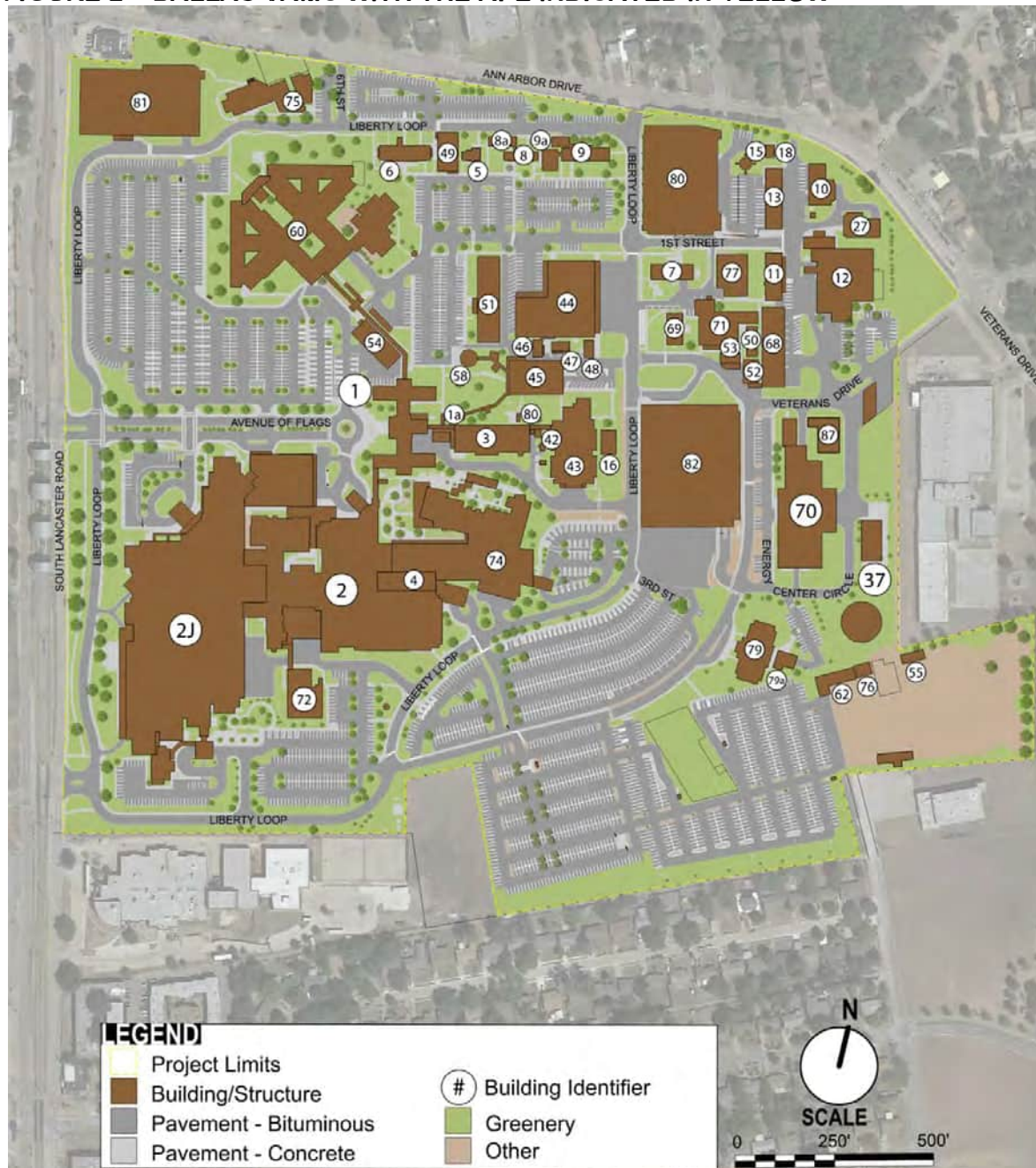


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### Assessment of Adverse Effect

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The effects of construction – noise, temporary alteration of campus roadways, installation of staging areas and trailers on existing hardscape – are temporary.

*CEMH* - VANTHCS has not finalized a design for CEMH facilities, including associated utilities and roadway improvements, and therefore the full range of effects on historic properties cannot be fully determined at this time. There is potential for the design to affect Building 1, both directly and indirectly.

*LTSCI* –No historic buildings will be demolished or otherwise altered by the construction and operation of LTSCI facilities. As seen in Figure 1, there are several buildings located between Buildings 1/3 and the proposed construction. Views of the LTSCI from Building 1 will be limited to the upper stories; the historic viewshed of Building 1 has been impeded since construction of Building 2 in 1955 and the subsequent expansion of that space. The demolition of non-historic built resources is not an adverse effect. No historic properties are anticipated to be affected by the construction and operation of the LTSCI facilities.

### Consultation

VANTHCS requests your comment on the new delineation of the APE, updated identification of historic properties, and assessment of adverse effects to historic properties as well as our proposal to supersede the 2013 MOA by executing a Programmatic Agreement to address the new undertaking. A draft of the PA is included in this documentation for review and comment and was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to discuss the Undertaking, its anticipated effects to historic properties, and measures

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<sup>2</sup> Steven Hunt, Site 41DL499, Atlas No. 9113049902, October 24, 2011.



Page 7

National Historic Preservation Act Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

to resolve adverse effects. VANTHCS proposes to hold the meeting during the week of November 29, 2021. If preferred, VANTHCS will discuss the Undertaking with you individually. Please respond to Karen Wieckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your preference and availability by November 22, 2021.

Thank you for your attention to this matter. Please contact Ms. Wieckowski if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Holt".

Stephen R. Holt, MD, MPH, MSNRS  
Executive Director

Enclosures

cc:

Douglas Pulak, U.S. Department of Veterans Affairs  
Hector Abreu, U.S. Department of Veterans Affairs  
Karen Wieckowski, U.S. Department of Veterans Affairs  
Angela McArdle, Advisory Council on Historic Preservation  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission



December 17, 2021

Karen Wieckowski  
VA Office of Construction and Facilities Management  
1425 Tri State Parkway, Ste 140  
Gurnee, IL 60031

Re: *Request for SHPO Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health and Long Term Spinal Cord Injury at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, Dallas County (VA/106, THC #202203790)*

Dear Karen Wieckowski:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed undertaking from Mark Wolfe, Executive Director of the Texas Historical Commission (THC) and the State Historic Preservation Officer.

It is our understanding that from 2010 to 2013 the U.S. Department of Veterans Affairs (VA) North Texas Health Care System (VANTHCS) consulted with our office to resolve adverse effects to historic properties related to the construction of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) facilities at the Dallas VA Medical Center (VAMC). In our previous consultation, it was established that the proposed construction would have resulted in the demolition of three buildings—the Managers Quarters (Building 5), the Nurses Dormitory (Building 6), and the Boiler House (Building 10)—that were determined eligible for listing in the National Register of Historic Places (NRHP), and that the proposed Undertaking would adversely affect historic properties. As such, a Memorandum of Agreement (MOA) was executed in 2013 to resolve any adverse effects, and the MOA was extended in December 2017 to allow more time to implement the Undertaking. Since the time of that review, VANTHCS has proposed to supersede the MOA with a Programmatic Agreement (PA), which would allow VANTHCS to phase the assessment of Adverse Effects for the proposed project based on the design of the Undertaking which is still in development. The THC is in receipt of your initial draft PA and our comments on that document are enclosed. Additionally, we are in receipt of the draft survey report—*Identification of Historic Properties Potentially Affected by the Proposed LTSCI and CEMH Projects*. Our comments on that document are below. Please note that our comments on the draft survey report will likely need to be addressed before we proceed with additional consultation on the draft PA.

The History Programs Division review staff, led by Caitlin Brashear, has reviewed the draft survey report identifying historic properties, and has the following comments on that document regarding above-ground resources. We **concur** that Building 1/1A (Behavioral Health) is Eligible for listing in the NRHP under Criterion A at the local level as a representation of federal government care for Veterans and under Criterion C in the area of Architecture, and that Building 3 (Research Laboratories) should be considered as an Eligible component of Building 1/1A. We also **concur** that the following resources are not *individually* Eligible for listing in the NRHP: the Main Hospital (Building 2), Learning Center (Building 4), Managers Quarters (Building 5), Nurses Dormitory (Building 6), Texas Tech School of Pharmacy (Building 7), Police, Nursing, Facility Planner, Credentialing (Building 8), Engineering Service (Building 9), Boiler House (Building 10), Engineering Shops (Building 11), Laundry (Building 12), Engineering Shops/Garage Building 13), Water Tower (Structure 15), Pump/Meter House (Building 18), and Warehouse (Building 44). However, we **do not concur** that Buildings 5, 6, and 10 are Ineligible for listing in the NRHP as Contributing resources to a

Dallas VAMC historic district. As noted in the Multiple Property Documentation Form (MPDF) for United States Second Generation Veterans Hospitals criteria for evaluating historic districts, “discrete portions of the complex may merit eligibility as a historic district even though the composite sense of theme, place, or time is lost.” Despite modern intrusions and recent alterations to the hospital complex as a whole, we believe that sufficient integrity remains within a smaller area of the complex to convey the historic design and function of the complex. This smaller district would include Building 1/1A, Building 3, Building 5, Building 6, Building 10, Building 11, Building 13, Structure 15, and Building 18. We recommend that this refined Dallas VAMC historic district, would be Eligible for listing under Criterion A as a representation of federal government care for Veterans at the local level, and under Criterion C for Architecture. Should you not agree with our recommendations, additional justification for the change in determination of Eligibility from our previous consultation for Buildings 5, 6, and 10 may be required.

The Division of Architecture review staff, led by Alex Toprac, has determined that the undertaking will continue to have an Adverse Effect on the potential Dallas VAMC historic district, and more specifically on those historically contributing facilities proposed for demolition (Buildings 5, 6, and 10) as well as on Building 1 due to the proposed alterations. Our staff looks forward to continuing to review drafts of the PA to ensure that any foreseeable adverse effects to above-ground resources and corresponding procedures for the resolution of adverse effects are addressed appropriately.

The Archeology Division review staff, led by Rebecca Shelton, has reviewed the draft survey report identifying historic properties, and has the following comments on that document regarding archaeological site **41DL499**. We concur with the statement on page 13 which notes that “unevaluated portions of the site may contain deposits,” specifically intact deposits. Although 1.2 acres of the site were reviewed in 2011, the NRHP designation for the entire site remains listed as undetermined in the THC Sites Atlas. In addition, page 35 states “there is potential for disturbance to potential [sic.] intact deposits of site **41DL499** related to the proposed undertaking.” We recommend a detailed archival evaluation be conducted using historic aerials and Sanborn maps (if they are available for this location) to see what the potential is for uncovering subsurface features at the locations where construction is proposed. If there are areas identified within the proposed locations for construction, additional archeological investigations may need to be conducted.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review, or if we can be of further assistance, please contact Caitlin Brashear at 512-463-5851 or [caitlin.brashear@thc.texas.gov](mailto:caitlin.brashear@thc.texas.gov); Alex Toprac at 512-463-6183 or [alex.toprac@thc.texas.gov](mailto:alex.toprac@thc.texas.gov); and Rebecca Shelton at 512-463-6043 or [rebecca.shelton@thc.texas.gov](mailto:rebecca.shelton@thc.texas.gov).

Sincerely,



Caitlin Brashear, Historian, Federal Programs  
For: Mark Wolfe, State Historic Preservation Officer

Enclosure: Comments on the draft PA

cc: Hector Abreu, U.S. Department of Veterans Affairs, *via email*  
Douglas Pulak, U.S. Department of Veterans Affairs, *via email*  
Murray Miller, City of Dallas Office of Historic Preservation, *via email*  
Angela McArdle, ACHP VA Liaison, *via email*  
Mary B. Botone, Wichita & Affiliated Tribes, *via email*

## Rob Clark

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**Subject:** RE: THC Letter Response and Comments on Draft PA for the LTSCI & CEMH Dallas Project (Track# 202203790)

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**From:** Wieckowski, Karen (CFM) <Karen.Wieckowski@va.gov>  
**Sent:** Monday, December 27, 2021 8:27 AM  
**To:** Mack, Bruce G. (CFM) <Bruce.Mack@va.gov>; Read, Patrick R. (CFM) <Patrick.Read@va.gov>; Rob Clark <rclark@ttlassoc.com>; Kelly Sellers Wittie <kelly@row10hps.com>; Zelenka, Karen (CFM) <Karen.Zelenka@va.gov>  
**Cc:** Abreu, Hector M. <Hector.Abreu@va.gov>; Pulak, Douglas D. (CFM) <Douglas.Pulak@va.gov>  
**Subject:** FW: THC Letter Response and Comments on Draft PA for the LTSCI & CEMH Dallas Project (Track# 202203790)

Forwarding comments fyi from the City of Dallas on the Windshield Survey.

*KarenAWieckowski*

Project Manager VA CFM  
202-445-8901

---

**From:** Miller, Murray <murray.miller@dallascityhall.com>  
**Sent:** Friday, December 24, 2021 12:53 PM  
**To:** Wieckowski, Karen (CFM) <Karen.Wieckowski@va.gov>  
**Cc:** Alex Toprac <alex.toprac@thc.texas.gov>; Rebecca Shelton <Rebecca.Shelton@thc.texas.gov>; mary.botone@wichitatribe.com; Rachel.Brown@DallasCounty.org; admin@preservationdallas.org; amcardle@achp.gov; Caitlin Brashear <Caitlin.Brashear@thc.texas.gov>; Pulak, Douglas D. (CFM) <Douglas.Pulak@va.gov>; Abreu, Hector M. <Hector.Abreu@va.gov>  
**Subject:** [EXTERNAL] RE: THC Letter Response and Comments on Draft PA for the LTSCI & CEMH Dallas Project (Track# 202203790)

Hello Karen,

Thank you for sending the Windshield Survey after the December 1, 2021, Consulting Party Meeting. The City of Dallas's Office of Historic Preservation offers the following observations, with the understanding that feedback on the proposed undertaking and the identified potential effects are due today:

1. There appears to be a building-centric focus on the evaluation of historic properties, where individual eligibility is weighted more favorably than comparative discussions on the potential group/associative values that might make certain properties eligible for NR listing at the local level;
2. There appears to be insufficient illustrated evidence of the consideration of alternatives to demolition of properties, including historic properties that were acknowledged as being eligible for listing in 2010;
3. There is insufficient visual analysis of the assessments of integrity where baseline conditions are discussed in relation to changes to the setting that have been cited as the primary reasons for ineligibility;
4. Proposed undertakings appear to further compromise the residual settings of eligible historic properties, which will likely have cumulative effects that may benefit from further evaluation.

Happy Holidays to all!  
Stay safe!

Murray

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**From:** Wieckowski, Karen (CFM) <[Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov)>  
**Sent:** Monday, December 20, 2021 4:58 PM  
**To:** Caitlin Brashear <[Caitlin.Brashear@thc.texas.gov](mailto:Caitlin.Brashear@thc.texas.gov)>  
**Cc:** Alex Toprac <[alex.toprac@thc.texas.gov](mailto:alex.toprac@thc.texas.gov)>; Rebecca Shelton <[Rebecca.Shelton@thc.texas.gov](mailto:Rebecca.Shelton@thc.texas.gov)>;  
[mary.botone@wichitatribe.com](mailto:mary.botone@wichitatribe.com); Miller, Murray <[murray.miller@dallascityhall.com](mailto:murray.miller@dallascityhall.com)>; [Rachel.Brown@DallasCounty.org](mailto:Rachel.Brown@DallasCounty.org);  
[admin@preservationdallas.org](mailto:admin@preservationdallas.org); [amcardle@achp.gov](mailto:amcardle@achp.gov); Pulak, Douglas D. (CFM) <[Douglas.Pulak@va.gov](mailto:Douglas.Pulak@va.gov)>; Abreu, Hector M. <[Hector.Abreu@va.gov](mailto:Hector.Abreu@va.gov)>  
**Subject:** RE: THC Letter Response and Comments on Draft PA for the LTSCI & CEMH Dallas Project (Track# 202203790)

**External Email!**

Hi Caitlin,

Thank you for your participation in this consultation. VA will review all the comments received and advance consultation efforts in January 2022. Please email me if you have any additional questions or require additional information before then.

*Karen A Wieckowski*

Project Manager VA CFM  
202-445-8901

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**From:** Caitlin Brashear <[Caitlin.Brashear@thc.texas.gov](mailto:Caitlin.Brashear@thc.texas.gov)>  
**Sent:** Friday, December 17, 2021 7:31 AM  
**To:** Wieckowski, Karen (CFM) <[Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov)>  
**Cc:** Alex Toprac <[Alex.Toprac@thc.texas.gov](mailto:Alex.Toprac@thc.texas.gov)>; Rebecca Shelton <[Rebecca.Shelton@thc.texas.gov](mailto:Rebecca.Shelton@thc.texas.gov)>;  
[mary.botone@wichitatribe.com](mailto:mary.botone@wichitatribe.com); Miller, Murray <[murray.miller@dallascityhall.com](mailto:murray.miller@dallascityhall.com)>; [Rachel.Brown@DallasCounty.org](mailto:Rachel.Brown@DallasCounty.org);  
[admin@preservationdallas.org](mailto:admin@preservationdallas.org); [amcardle@achp.gov](mailto:amcardle@achp.gov); Pulak, Douglas D. (CFM) <[Douglas.Pulak@va.gov](mailto:Douglas.Pulak@va.gov)>; Abreu, Hector M. <[Hector.Abreu@va.gov](mailto:Hector.Abreu@va.gov)>  
**Subject:** [EXTERNAL] THC Letter Response and Comments on Draft PA for the LTSCI & CEMH Dallas Project (Track# 202203790)

Hi Karen,

Thank you for meeting with our review staff earlier this month and for the opportunity to consult on the proposed Clinic Expansion for Mental Health (CEMH) & Long-Term Spinal Cord Injury (LTSCI) Facilities at the Dallas VAMC. Attached is a copy of our response letter and comments on the working draft of the Programmatic Agreement. You should also receive a copy of this letter response through our eTRAC system. Please feel free to reach out with any questions and we look forward to further consultation on this project.

Thanks,  
Caitlin



**Caitlin Brashear**

Historian, Federal Programs  
History Programs Division  
P.O. Box 12276, Austin, Texas 78711-2276  
Phone: +1 512 463 5851

[thc.texas.gov](http://thc.texas.gov)





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U.S. Department  
of Veterans Affairs

**Office of Construction & Facilities Management**

Central Region Office

1425 Tri-State Parkway, Suite 140

Gurnee, IL 60031

[www.va.gov](http://www.va.gov)

January 21, 2022

Ms. Caitlin Brashear  
Historian, Federal Programs  
History Programs Division  
P.O. Box 12276  
Austin, Texas 78711

**Subject:** Consultation Regarding the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long-Term Spinal Cord Injury (LTSCI) facilities at the VA NTHCS – Dallas VAMC campus, Dallas, Texas

Dear Ms. Brashear:

The U.S. Department of Veterans Affairs (VA) North Texas Health Care System (NTHCS) has determined larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically long term spinal cord injury (LTSCI) and mental health care services (also known as Clinical Expansion of Mental Health or CEMH), are needed at the Dallas VA Medical Center (VAMC) campus to address the undersized facilities and operational deficiencies at the Dallas VAMC to support the rapidly growing Veteran demand for health care services in the region. VA NTHCS serves more than 195,000 Veterans in 38 counties in Texas and 2 in southern Oklahoma. In 2017, the system provided approximately 1.4 million outpatient visits.

On December 1, 2021, VA hosted a Consulting Party meeting to discuss the proposed CEMH and LTSCI facilities Undertaking. This Undertaking has the potential to adversely affect historic resources. Participating Consulting Parties requested information about alternative sites/alternative construction that could lessen adverse effects to historic properties.

The Dallas VAMC measures 102 acres with limited space for expansion. The campus is bound on the west and north by busy area thoroughfares. Figure 1 provides a map of the campus in its current configuration. One potential configuration of the campus following construction of the CEMH and LTSCI facilities is included as Figure 2. VANTHCS has produced design plans for the LTSCI clinical facility, including associated utilities and roadway improvements, but has not finalized a design for the CEMH clinical facility, CEMH parking garage or LTSCI warehouse, including associated utilities and roadway improvements.

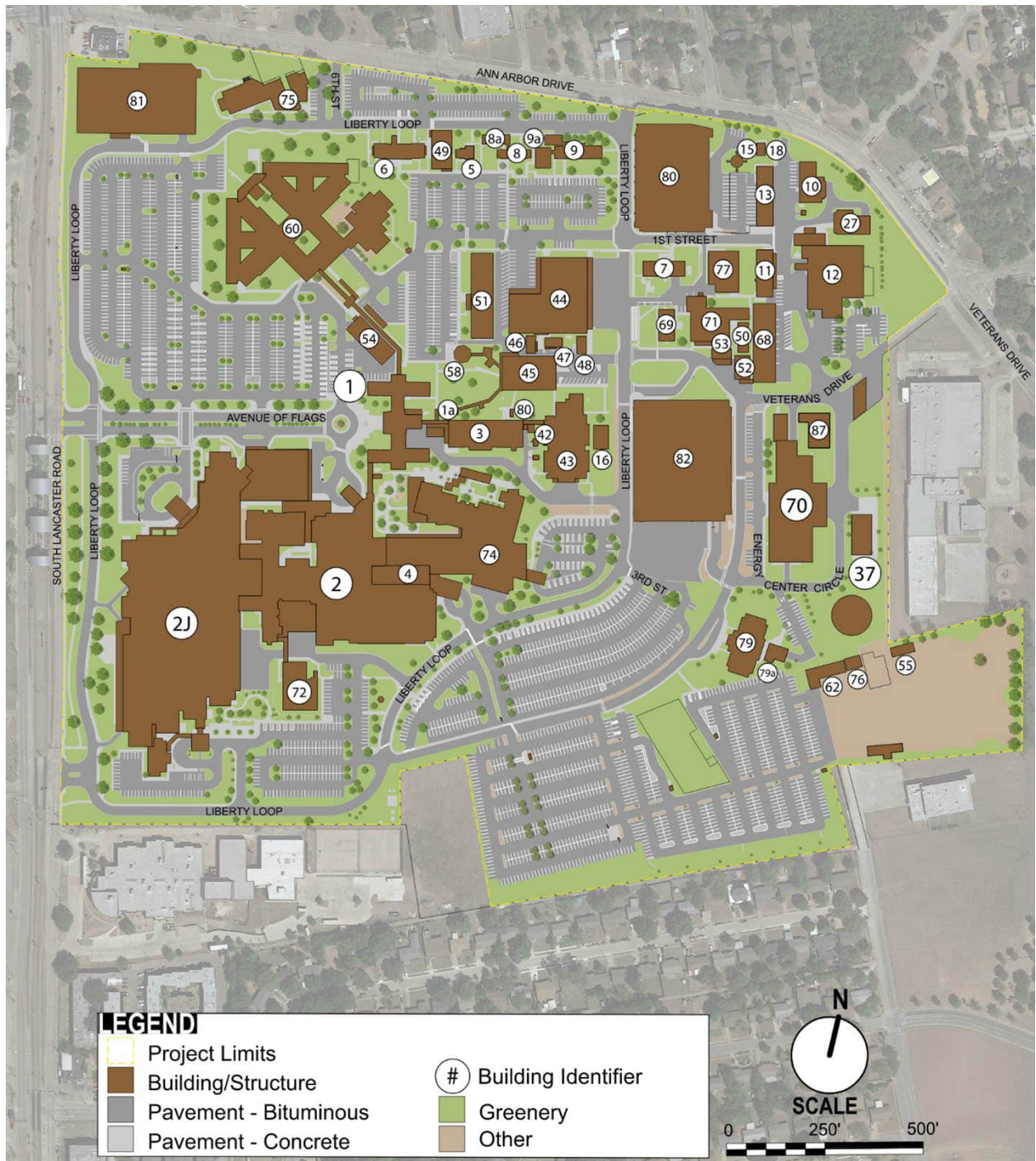


Figure 1 - Dallas VAMC

## Specifics of the Undertaking

The primary components of the CEMH project include:

- Demolition of Buildings 44, 45, TT46, TT47, TT48, TT51, TT54 and Structure 58.<sup>1</sup> Building 44 is a one-story, concrete warehouse built in 1976. The other buildings were constructed less than 45 years ago.
- Construction and operation of a new approximately 215,000-square-foot, three to four-story CEMH facility in the north-central portion of the campus, in the location of the to be demolished Buildings 44, 45, TT46, TT47, TT48, TT51, TT54, and Structure 58. The CEMH would consolidate and expand mental health services provided at the campus. It is anticipated the CEMH would consist of two adjacent, connected buildings, one containing a mental health clinic and one containing residences for mental health patients.
- Demolition of Buildings 5, 6, 8, 9 and TT49. Building 5 is a two-story, masonry/brick structure built in 1940 as the VA Hospital Manager's Quarters and is currently vacant. Building 6 is a three-story masonry/brick structure built in 1940 as nurses' quarters and is currently used as a Mental Health Treatment Day Services Center and Veteran Recovery Center. Building 8 is a two-story masonry/brick structure built in 1940 as a residence for the hospital director and chief surgeon and is currently used for Acquisition and Material Management. Building 9 is a one-story masonry/brick structure built in 1955 as a residence for the hospital physicians or other senior personnel and is currently used for Engineering Services. TT49 (Quality Management Services) is a temporary trailer that was installed on the campus in 2005.
- Reconfiguration/relocation of Liberty Loop and the construction of surface parking lots for the CEMH in the northern portion of the campus, in the location of the to be demolished Buildings 5, 6, 8, 9 and TT49. A reconfigured Dallas VAMC campus entrance may also be constructed in this area.
- Construction and operation of a new approximately 1,000-car, up to 5-story parking garage associated with the CEMH facility in the northwestern portion of the campus, in the northern portion of current Parking Lot 1.
- Vacation of mental health space in Building 1. Depending on future use, this space may require renovation.

The primary components of the LTSCI project include:

- Demolition of the small east wing of Building 74.
- Construction and operation a new approximately 172,000-square-foot, three-story (plus basement) LTSCI facility in the southeastern portion of the campus, adjacent to Building 74, in the location of the to be demolished eastern wing of Building 74. The LTSCI would provide residences for Veterans with long-term spinal cord injuries and would house an Outpatient Spinal Cord Injury Clinic and physical/occupational therapy facilities.
- Demolition of Buildings 10, 12, and 27. Building 10 is a two-story, masonry/brick structure built in 1940 as the campus boiler house and has been vacant since the early 1990s, when the new campus Energy Center (Building 70) was constructed. Building 12 is a two-story masonry/brick structure built between 1947 and 1955 and is used for the campus laundry. Building 27 is a one-story, masonry/brick warehouse built in 1991.
- Construction and operation of a new approximately 80,000-square-foot, two-story warehouse. The first floor of the building would primarily be used for storage and would include some office space. The second floor would include VAMC offices.
- Renovation of approximately 2,000 square feet of the basement of Building 2 to replace the displaced laundry services from Building 12.

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<sup>1</sup> Building TT54 was inadvertently excluded from the list provided in the letter to initiate consultation dated November 16, 2021. TT54 was constructed in 2008 and is not eligible for listing in the National Register of Historic Places.



- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

In addition, the LTSCI and CEMH projects include the installation, relocation, and/or removal of campus utilities to support the new development. A reorganization of campus roadways would also be required.

### **Proposed CEMH Clinical Facility**

The primary goal of construction of the new CEMH clinical facility is to consolidate departments, improve patient care, and improve workplace conditions through a new CEMH Building with Clinic and Domiciliary wings that meets current codes, standards, and has sufficient space for the current workload of the VANTHCS Mental Health program.<sup>2</sup>

An independent inspection of clinical space at the Dallas VAMC conducted in 1999 determined Building 1 to have space and functional inadequacies for the provision of mental health. To address these issues, VA relocated some mental health services to Buildings 6, 71, TT50, TT52, and TT53. This dispersion has created a lack of staff and equipment operational efficiencies such as a concern for the safety of Women Veterans and staff, particularly on weekends and after hours, in and around the Methadone Clinic and Trauma Services. This lack of monitoring also has resulted in diversion and trafficking of DEA-controlled substances.

Additionally, the design of Building 1 does not meet current VA, Architectural Barriers Act Accessibility Standards, and Americans with Disabilities Act (ADA) standards. For example, some clinical offices have narrow entry doors which do not allow wheelchair-bound Veterans to access the offices. In order to receive care in these offices, Veterans have to be lifted/moved from their wheelchairs into stationary chairs which represents an increased safety risk. The domiciliary and Substance Abuse Residential Rehabilitation Treatment Program lack private rooms, including bathrooms. This results in inadequate space separation between male and female bathrooms and sleeping and bathing quarters.

Building 1 measures 121,634 square feet. VA estimates it needs approximately 215,000 square feet of mental health space to be compliant with current VA standards, including the nationwide initiative to prevent suicides among Veterans. To meet this need, VA considered seven alternatives:

1. Status quo – Existing space and functional deficiencies would not be resolved.
2. Renovation – Existing space deficiencies would not be resolved without significant additions to Building 1.
3. Construction – Meets space and functional needs.
4. Lease – Does not meet functional needs. Increased required travel for Veterans and staff.
5. Contract services – Breaks the continuity of care. Increased required travel for Veterans and staff. Functional deficiencies would not be resolved.
6. Acquire existing facility – Limited options in the immediate area of the Dallas VAMC. Functional deficiencies would not be resolved.
7. Joint Project with DOD – No sharing agreements in place. Functional deficiencies would not be resolved.

Construction of a new facility best meets VA's needs.<sup>3</sup>

Any location selected for the proposed CEMH facility had to meet the requirements of the *VA Physical Security and Design Manual*. The CEMH facility is classified as Mission Critical and therefore requires

<sup>2</sup> Anderson Engineering of Minnesota, *VANTHCS Dallas CEMH Project Book – Final Draft*, December 17, 2021, 216.

<sup>3</sup> VA, Business Case: Construct Clinical Expansion for Mental Health (VHA17-549-2015-27435), July 12, 2018.

a 50' setback for safety.<sup>4</sup> The design must conform to the PG 18-12: *Inpatient Mental Health (IPMH) & Mental Health Residential Rehabilitation Treatment Program (MH RRTP) Design Guide*. For operational efficiencies, VA preferred to site the new CEMH clinical facility in a location that provided interior access to Building 2 (Main Hospital). The space north of Building 1 met these criteria.

### **Proposed CEMH Parking Garage**

The proposed CEMH parking garage is intended for Veteran and visitor parking. It is intended to replace lost surface parking spaces and service the CEMH clinical facility and Building 60 (Community Living Center). For operational efficiencies, a location close to the proposed CEMH facility that provided easy access to campus entrances/exits was preferred. VA also preferred to maintain the line-of-sight from South Lancaster Road to Building 1.<sup>5</sup>

### **Proposed LTSCI Clinical Facility**

VA is mandated to provide comprehensive care, including long-term residential care, to Veterans with spinal cord injuries and disorders that addresses their unique medical and psychosocial needs. VA Veterans Health Administration Directive 1176(2) outlines the requirements of the VA's Spinal Cord Injuries and Disorders System of Care. This directive requires that beds and staffing must be provided for spinal cord injuries and disorders to meet or exceed requirements as described in this directive.<sup>6</sup> At present, the Dallas VAMC has an acute spinal cord injury clinic but there are no long-term beds for spinal cord injuries or disorders in VISN 17,<sup>7</sup> the network of VA medical centers and clinics covering most of Texas and portions of New Mexico and Oklahoma, and recent analyses predict an increased bed shortage in the coming decades. It is anticipated that a LTSCI facility in Dallas would serve all of VISN-17 and receive referrals from adjacent VA regional networks.<sup>8</sup>

The proposed LTSCI clinical facility will measure approximately 172,000 square feet. Any location selected for the proposed LTSCI facility had to meet the requirements of the *VA Physical Security and Design Manual*. The LTSCI clinical facility is classified as Mission Critical and therefore requires a 50' setback for safety.<sup>9</sup> The location further had to meet the requirements of VA PG 18-12: *Spinal Cord Injury/Disorders Center Design Guide* which requires LTSCI clinical facilities to be "located at ground level with a dedicated entrance and direct access to exterior passive and active recreational space."<sup>10</sup> Furthermore, VA works to incorporate outdoor spaces and connections to outdoor living spaces, as practical, to facilitate recovery.<sup>11</sup>

To meet these requirements and best integrate into the functionality of the Dallas VAMC, VA chose to site the proposed LTSCI clinical facility adjacent to Building 74, the existing acute clinic for spinal cord injuries proximate and accessible to Building 2 to provide internal access to Building 2, the main hospital so patients will not have to be transported by vehicle. Additionally, this location provided space for construction of a dedicated LTSCI parking garage. The site is large enough to provide space for outdoor activity centers.

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<sup>4</sup> VA, *VA Physical Security and Resiliency Design Manual*, October 1, 2020, revised September 1, 2021, page 6-3.

<sup>5</sup> Anderson Engineering of Minnesota, *VANTHCS Dallas CEMH Project Book – Final Draft*, December 17, 2021, 270.

<sup>6</sup> VA, VHA Directive 1176(2), issued September 30, 2019, amended February 7, 2020, 1.

<sup>7</sup> VA has created regional systems of care for medical centers and clinics to work together to better meet local health care needs and provides greater access to care known as Veterans Integrated Services Networks (VISNs). VANTHCS is located in VISN 17: VA Heart of Texas Health Care Network.

<sup>8</sup> VA, Business Case: Spinal Cord Injury (VHA17-549-2015-27415), August 23, 2013.

<sup>9</sup> VA, *VA Physical Security and Resiliency Design Manual*, October 1, 2020, revised September 1, 2021, page 6-3.

<sup>10</sup> VA, PG 18-12: Spinal Cord Injury/Disorders Center Design Guide, November 1, 2020, 2-11.

<sup>11</sup> VA, PG 18-12: Spinal Cord Injury/Disorders Center Design Guide, November 1, 2020, 2-12.

### **Proposed LTSCI Warehouse**

Although identified as the LTSCI warehouse, this warehouse is intended to service the entire campus.

Any location selected for the proposed LTSCI warehouse had to meet the requirements of the *VA Physical Security and Design Manual*. The warehouse is classified as Life Safety Protected and therefore requires a 25' setback for safety.<sup>12</sup> Construction of the CEMH and LTSCI clinical facilities will require demolition of existing Engineering/Service offices, storage, and workspaces, including Building 44 (the existing warehouse). The proposed warehouse will replace these spaces and consolidate functions. It will measure approximately 80,000 square feet.

The Dallas VAMC is working to develop a dedicated Engineering/Service zone in the northeastern portion of the campus, away from Veteran health care operations, for increased Veterans/visitor/staff safety and improved circulation. The proposed warehouse location is within this zone. The location is adjacent to Ann Arbor Avenue and therefore allows VA to create a dedicated service entry to minimize interruptions to campus traffic. The service yard is required to have a minimum of 92-foot diameter turnaround to provide access space for large delivery trucks and fire engine maneuvering.<sup>13</sup> A dedicated service parking lot also will be constructed to separate Engineering/Service vehicles from staff parking. Additionally, the location and orientation of the proposed building provides for creation of a service yard oriented toward Ann Arbor Avenue to minimize the impact of odors on medical spaces of the campus.<sup>14</sup>

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<sup>12</sup> VA, *VA Physical Security and Resiliency Design Manual*, October 1, 2020, revised September 1, 2021, page 6-3.

<sup>13</sup> Anderson Engineering of Minnesota, *VANTHCS Dallas CEMH Project Book – Final Draft*, December 17, 2021, 159.

<sup>14</sup> Page Southerland Page, LTSCI + CEMH DD Presentation, October 27, 2011, slide 29.







**U.S. Department of Veterans Affairs**

Veterans Health Administration  
VA North Texas Health Care System

March 8, 2022

In Reply Refer To: 549/00

Murray Miller  
Director  
City of Dallas Office of Historic Preservation  
Dallas Certified Local Government  
1500 Marilla Room 5BN  
Dallas, TX 75201  
Via email: [Murray.Miller@dallascityhall.com](mailto:Murray.Miller@dallascityhall.com)

Re: National Historic Preservation Act Section 106 Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long-Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas (VA/106, THC #202203790)

Dear Director Miller:

Thank you for the continued involvement of the City of Dallas Office of Historic Preservation (DOHP) in consultation related to the construction and operation of CEMH and LTSCI facilities at the U.S. Department of Veterans Affairs North Texas Health Care System (VANTHCS) Dallas VA Medical Center (VAMC).

VANTHCS seeks to supersede the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion for Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* (MOA) executed January 22, 2013 and scheduled to expire January 23, 2023, with a programmatic agreement (PA) due to changes in the definition of the Undertaking. The revised Undertaking includes the construction of a CEMH clinical facility, a LTSCI clinical facility, a CEMH parking garage, and a warehouse including all associated infrastructure and utility improvements, including stormwater, telecom, and electrical. Although the design of the LTSCI clinical facility is largely decided and similar to the design proposed and consulted on in 2010, the design of the CEMH clinical facility is in development due to increased patients loads at the Dallas VAMC and recent changes in VA's design standards and guidelines. Given the state of the CEMH design and the need to phase assessment of adverse effects, VANTHCS formally notified your office and other potential Consulting Parties of the intent to develop a PA on November 19, 2021. VANTHCS is consulting with appropriate agencies, Indian tribes, and organizations in accordance with 36 CFR § 800.14(b) to develop the PA.

In your email of December 24, 2022, the DOHP provided the following comments identified in italics. VANTHCS's responses follow:

*Corporate Office:* Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, TX 75216  
*Sam Rayburn Memorial Veterans Center,* 1201 East Ninth Street, Bonham, TX 75418  
*Fort Worth Outpatient Clinic,* 2201 SE Loop 820, Fort Worth, TX 76119  
*Tyler VA Primary Care Clinic,* 7916 S. Broadway Ave, Tyler, TX 75703  
*Polk Street Annex Primary Care Clinic,* 4243 S. Polk Street, Dallas, TX 75224  
*Plano VA Outpatient Clinic,* 3804 W, 15<sup>th</sup> Street, Plano, TX 75075  
*Grand Prairie VA Outpatient Clinic,* 2737 Sherman Drive, Grand Prairie, TX 75051  
*Garland VA Medical Center,* 2300 Marie Curie Boulevard, Garland, TX 75042

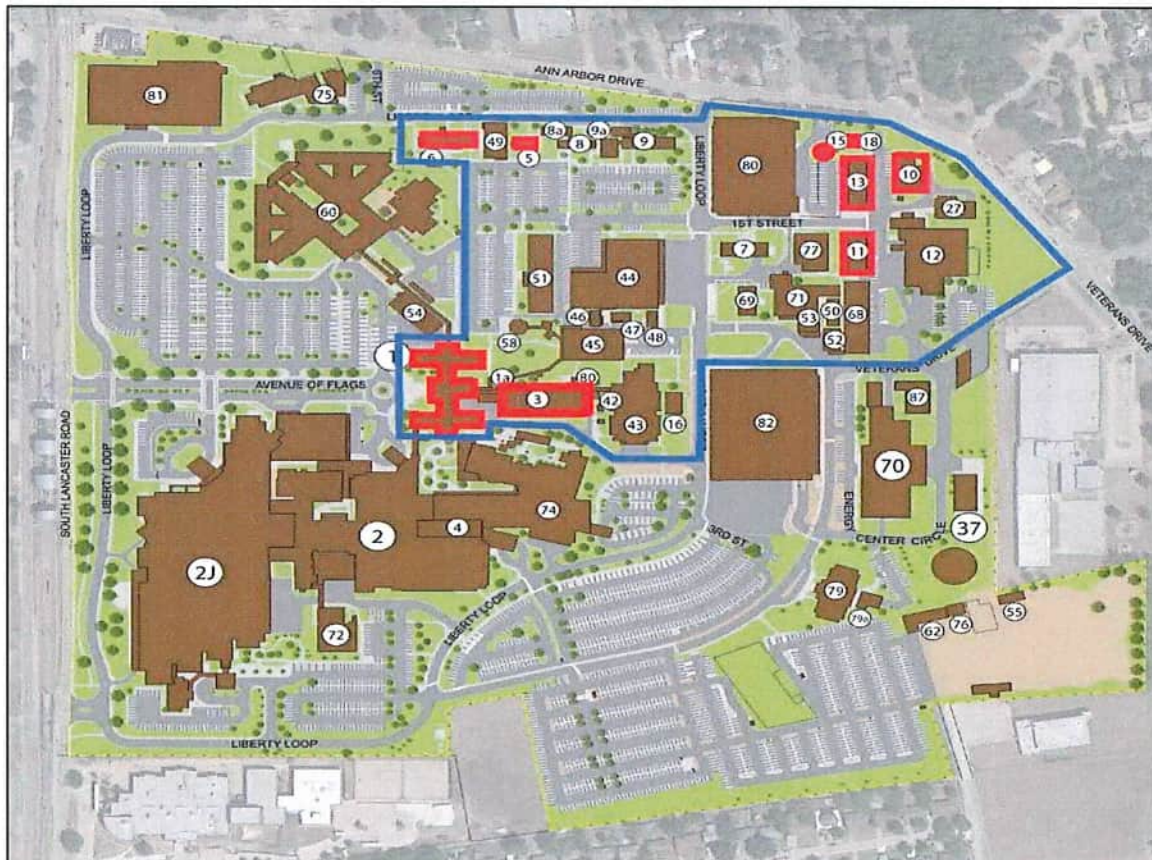


1. There appears to be a building-centric focus on the evaluation of historic properties, where individual eligibility is weighted more favorably than comparative discussions on the potential group/associative values that might make certain properties eligible for NR listing at the local level;

VANTHCS, as a result of your comments and recommendations provided by the Texas Historical Commission (THC) reviewed its identification of historic built resources. VANTHCS looked at the Dallas VAMC campus as a whole. Less than 30% of the built stock of the campus was constructed more than 45 years ago (16 of the total 54 buildings, structures, and objects). Of these, VANTHCS and the THC concur that Buildings 2, 4, 7, 8, 9, and 12 lack the necessary integrity to be listed in the National Register of Historic Places (NRHP) and that Building 44 lacks the necessary significance. This leaves nine potential historic buildings and structures of the total 54 (Buildings 1, 3, 5, 6, 10, 11, 13, 18 and Structure 15). Although there is no established threshold or limit for contributing/non-contributing ratios, the recommended number of contributing buildings account for less than 17% of the total. VANTHCS does not support an assertion that the whole of the Dallas VAMC campus should be designated as a historic district, including at the local level of significance due to lack of integrity.

On December 17, 2021, and in subsequent discussions to provide clarification, the THC recommended a portion of the Dallas VAMC be designated a historic district (Figure 1).

**FIGURE 1 - RECOMMENDED BOUNDARIES OF A DALLAS VAMC CAMPUS HISTORIC DISTRICT. RECOMMENDED BOUNDARY INDICATED IN BLUE. RECOMMENDED CONTRIBUTING RESOURCES IDENTIFIED IN RED.**





VANTHCS has considered the historic district boundaries recommended by the THC and does not concur that the historic district possesses the integrity necessary for listing in the NRHP. The recommended historic district would contain nine contributing buildings and 28 non-contributing buildings. Although there is no established threshold or limit for contributing/non-contributing ratios, the recommended number of contributing buildings in the proposed district account for less than 25% of the total (9 buildings out of 37 resources; the total square footage of non-contributing buildings is more than 250,000 square feet larger than contributing square footage). Additionally, as development of the campus has resulted in the construction of buildings, structures, objects, and features such as parking lots, across the once-open greenspaces of the property, there are no contributing landscapes or roadways. As seen in the supporting documentation, many of these newer buildings are large in scale, such as Building 43 and the parking garages, which further reduces the visual links among the original campus buildings.

VANTHCS also reviewed the guidance provided by the THC in the letter dated December 17, 2021, concerning the eligibility of the campus under the Second Generation of Veterans Hospitals nationwide context. As a historic district eligible under both Criteria A and C, Second Generation facilities should retain a high degree of integrity regarding the resources' physical characteristics, including materials, workmanship, and design, and more ephemeral characteristics related to the historic district as a whole, such as location, setting, association, and feeling. The collection of resources within the historic district must reflect the spatial patterns and associations dating to the period of significance (For the Dallas VAMC, 1940-1950). Pages 102-107 of Section F of the Second-Generation Multiple Property Documentation Form provide standards and guidance for evaluating Second Generation campuses for listing in the NRHP. The Dallas VAMC lacks architectural cohesion as required by the context. The modern construction is not sympathetic in massing, scale, footprint, or design, despite the occasional use of red brick on the exterior to attempt a visual link with the original buildings. These buildings are distributed throughout the campus, including throughout the original functional groupings of the 1940 campus and thereby interrupt the original spatial patterns and associations. Additionally, construction of Building 2 in 1955 shifted the focal point of the campus away from Building 1, the original hospital. Subsequent additions to Building 2 also resulted in the loss of the formal campus entry.<sup>1</sup>

Lastly, the open greenspaces of the original campus, specifically the lawn north of Building 1, have been covered by modern construction and parking lots. VANTHCS does not concur that the campus or portions of the campus possesses the integrity necessary for listing in the NRHP under the Second Generation of Veterans Hospitals. Photos and maps documenting the development of the Dallas VAMC are included as Attachment B.

VANTHCS has determined Building 1, with Building 3 as a component, retains the necessary integrity and possesses the significance necessary for individual listing in the NRHP.

*2. There appears to be insufficient illustrated evidence of the consideration of alternatives to demolition of properties, including historic properties that were acknowledged as being eligible for listing in 2010;*

DOHP participated in the December 1, 2021, consulting party meeting regarding this Undertaking and provided comments in an email dated December 24, 2021. As part of these

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<sup>1</sup> Adverse effects resolved through implementation of the *Memorandum of Agreement* executed May 2, 1990 by VA and the THC, and accepted by the Advisory Council on Historic Preservation on June 15, 1990.



communications, the DOHP requested additional information about alternatives considered by VANTHCS that may have impacted the overall level of adverse effect to historic properties. VANTHCS provided this information to DOHP and all parties via email on January 21, 2022.

*3. There is insufficient visual analysis of the assessments of integrity where baseline conditions are discussed in relation to changes to the setting that have been cited as the primary reasons for ineligibility;*


Attachment A contains an archival review of the development of the Dallas VAMC property, including maps and photographs from 1891 to the present. As seen in this documentation, the setting of the Dallas VAMC has changed significantly since its initial construction in the early 1940s. Significant changes include (1) replacement of the original formal entry to Building 1 with a curvilinear roadway to Building 2 in the mid-1950s; (2) infill of the open greenspace between Building 1 and the former residences with large buildings and parking lots; (3) removal of the campus roadway, and (4) construction of modern buildings not in keeping with the scale/massing of the original buildings of the Dallas VAMC campus. The accumulation of these changes is a diminishment of the prominence of Building 1, a characteristic both of the original campus design and the Second Generation of Veterans Hospital nationwide campaign.

*4. Proposed undertakings appear to further compromise the residual settings of eligible historic properties, which will likely have cumulative effects that may benefit from further evaluation.*

VANTHC has determined Building 1, with Building 3 as a component, is individually eligible for listing in the NRHP. VANTHCS has stated a potential for adverse effects to the setting and viewsheds of these buildings as a result of the proposed construction of the CEMH clinical facility. VANTHCS has proposed to include design review in the PA to seek comments and guidance from offices such as yours to minimize and/or avoid adverse effects to historic properties. VANTHCS has recommended development of a PA in order to phase assessment of effect, including cumulative effects, until a design has been selected.

A draft of the revised PA is included as an attachment to this letter for review and comment. Comments are requested in 30 days. A copy was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to continue discussion of the Undertaking and the development of the PA. VANTHCS proposes to hold the meeting in the first week of April 2022. Please respond to Karen Więckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your availability that week by March 25, 2022.

Thank you for your attention to this matter. Please contact Ms. Więckowski if you have any questions or require any additional information.

Sincerely,  
  
**FOR AND IN  
THE ABSENCE OF**  
Stephen R. Holt, MD, MPH, MSNRS  
Executive Medical Center Director

Enclosures

Attachment A – Archival Review  
Attachment B – Development of Dallas VAMC  
Attachment C – Draft PA



Page 5

cc:

Héctor Abreu-Cintrón, Federal Preservation Officer, U.S. Department of Veterans Affairs  
Karen Więckowski, Project Manager, U.S. Department of Veterans Affairs  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission



**U.S. Department of Veterans Affairs**

Veterans Health Administration  
VA North Texas Health Care System

March 8, 2022

In Reply Refer To: 549/00

Mark Wolfe  
State Historic Preservation Officer  
Texas Historical Commission  
P.O. Box 12276  
Austin, Texas 78711-2276

Re: National Historic Preservation Act Section 106 Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long-Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas (VA/106, THC #202203790)

Dear Mr. Wolfe:

Thank you for the continued involvement of the Texas Historical Commission (THC) in consultation related to the construction and operation of CEMH and LTSCI facilities at the U.S. Department of Veterans Affairs North Texas Health Care System (VANTHCS) Dallas VA Medical Center (VAMC).

VANTHCS seeks to supersede the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion for Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* (MOA) executed January 22, 2013 and scheduled to expire January 22, 2023, with a programmatic agreement (PA) due to changes in the definition of the Undertaking. The revised Undertaking includes the construction of a CEMH clinical facility, a LTSCI clinical facility, a CEMH parking garage, and a warehouse including all associated infrastructure and utility improvements, including stormwater, telecom, and electrical. Although the design of the LTSCI clinical facility is largely decided and similar to the design proposed and consulted on in 2010, the design of the CEMH clinical facility is in development due to recent changes in the patient load of the Dallas VAMC and VA's design standards and guidelines. Given the state of the CEMH design and the need to phase assessment of effects, VANTHCS formally notified your office and other potential Consulting Parties of the intent to develop a PA on November 19, 2021. PPaP

*Corporate Office:* Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, TX 75216  
Sam Rayburn Memorial Veterans Center, 1201 East Ninth Street, Bonham, TX 75418  
Fort Worth Outpatient Clinic, 2201 SE Loop 820, Fort Worth, TX 76119  
Tyler VA Primary Care Clinic, 7916 S. Broadway Ave, Tyler, TX 75703  
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Grand Prairie VA Outpatient Clinic, 2737 Sherman Drive, Grand Prairie, TX 75051  
Garland VA Medical Center, 2300 Marie Curie Boulevard, Garland, TX 75042



VANTHCS is consulting with appropriate agencies, Indian tribes, and organizations in accordance with 36 CFR § 800.14(b) to develop the PA.

In addition, following the opening of the CEMH clinical facility, VANTHCS intends to move some select services from Building 1 into the new CEMH clinical facility. While a change in building function is not considered an adverse effect to historic properties, if VANTHCS determines additional modifications are needed to Building 1 to make it fit new potential program needs, VANTHCS will initiate Section 106 consultation with the THC and others as required. In accordance with VANTHC's budget projections, VANTHCS also will commit to seek funding to rehabilitate Building 1, which include renovations to the lobby area that currently holds offices and mechanical equipment.

#### Area of Potential Effects

Due to the changes in the definition of the Undertaking, VA recommended expanding the Area of Potential Effects (APE) for the Undertaking to account for all potential adverse effects. The letter of December 17, 2021, from your office and subsequent conversations with your staff imply concurrence with VANTHCS's delineation of an APE to include the whole of the Dallas VAMC, but a formal statement has not been received. VANTHCS requests your concurrence with the revised APE.

#### Identification of Historic Properties

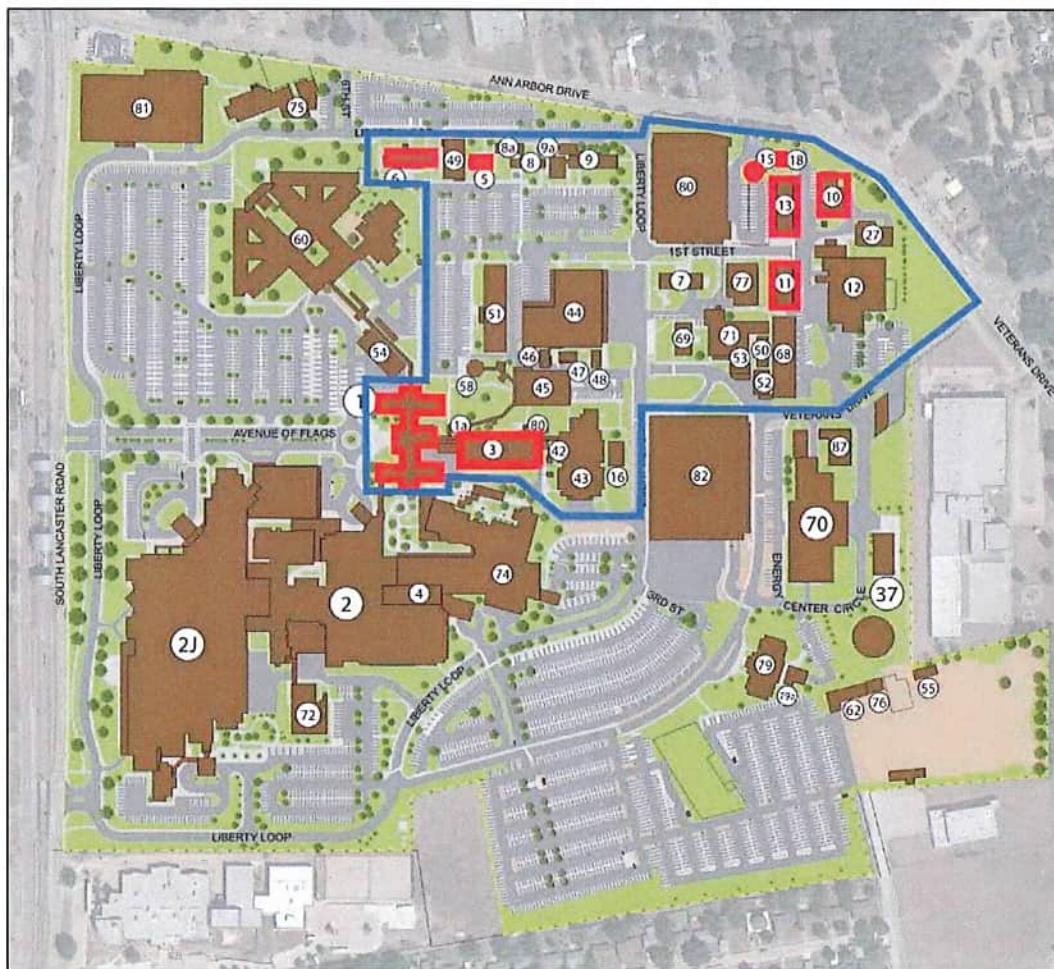
In the letter dated December 17, 2021, the THC requested an archival review to determine the potential of Site 41DL499 to hold intact subsurface deposits eligible for listing in the National Register of Historic Places (NRHP). VANTHCS investigated the past history of the property, both prior to purchase of the land in 1937 by the Veterans Administration and subsequent development of the medical center as requested (Attachment A). Prior to purchase by the Veterans Administration, the land was in use as an agricultural field with a small cluster of private residences near the intersection of South Lancaster and Ann Arbor roads. The Veterans Administration demolished all residences on the government's property and constructed ten buildings and a water tank with all associated utilities in the early 1940s. In the early 1950s, the Veterans Administration began construction of additional medical, residential, and engineering/support facilities. Development of the campus accelerated in the 1980s/1990s as the population of Dallas and Texas increased. Several more medical and support buildings, along with associated utilities, have been constructed. The campus retains minimal greenspace due to the increased need for parking. Due to this development, VANTHCS has determined Site 41DL499 has little to no potential to contain intact deposits eligible for listing in the NRHP. VA requests your concurrence with this determination.

In the letter dated December 17, 2021, the THC concurred with VA's determination that Building 1, with Building 3 as an eligible component, was eligible for individual listing in the NRHP under Criteria A and C. The THC also concurred that Buildings 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 18, and 44, and Structure 15 are not eligible for individual listing in



the National Register of Historic Places. In this same letter, the THC recommended a portion of the Dallas VAMC campus be designated a historic district with Buildings 1, 3, 5, 6, 10, 11, 13, 18, and Structure 15 as contributing resources. On January 25, 2022, VANTHCS met with Alex Toprac, Caitlin Brashear, and Rebecca Shelton of your office to receive clarification on the boundaries of THC's historic district recommendation. Ms. Brashear recommended the boundaries shown in blue in Figure 1 below and confirmed the proposed boundaries in a subsequent meeting held February 9, 2022.

**FIGURE 1 - RECOMMENDED BOUNDARIES OF A DALLAS VAMC CAMPUS HISTORIC DISTRICT. RECOMMENDED BOUNDARY INDICATED IN BLUE. RECOMMENDED CONTRIBUTING RESOURCES IDENTIFIED IN RED.**



VANTHCS has considered the THC recommendation and does not concur that the recommended historic district possesses the integrity necessary for listing in the NRHP. The recommended historic district would contain nine contributing buildings and 28 non-contributing buildings. Although there is no established threshold or limit for contributing/non-contributing ratios, the recommended number of contributing buildings



in the proposed district account for less than 25% of the total (9 buildings out of 37 resources; the total square footage of non-contributing buildings is more than 250,000 square feet larger than contributing square footage). Additionally, as development of the campus has resulted in the construction of buildings, structures, objects, and features such as parking lots, across the once-open greenspaces of the property, there are no contributing landscapes or roadways. As seen in the supporting documentation (Attachment B), many of these newer buildings are large in scale, such as Building 43 and the parking garages, which further reduces the visual links among the original campus buildings.

VANTHCS also reviewed the guidance provided by the THC in the letter dated December 17, 2021, concerning the eligibility of the campus under the Second Generation of Veterans Hospitals nationwide context. As a historic district eligible under both Criteria A and C, Second Generation facilities should retain a high degree of integrity regarding the resources' physical characteristics, including materials, workmanship, and design, and more ephemeral characteristics related to the historic district as a whole, such as location, setting, association, and feeling. The collection of resources within the historic district must reflect the spatial patterns and associations dating to the period of significance (For the Dallas VAMC, 1940-1950). Pages 102-107 of Section F of the Second-Generation Multiple Property Documentation Form provide standards and guidance for evaluating Second Generation campuses for listing in the NRHP. The Dallas VAMC lacks architectural cohesion as required by the context. The modern construction is not sympathetic in massing, scale, footprint, or design, despite the occasional use of red brick on the exterior to attempt a visual link with the original buildings. These buildings are distributed throughout the campus, including throughout the original functional groupings of the 1940 campus and thereby interrupt the original spatial patterns and associations. Additionally, construction of Building 2 in 1955 shifted the focal point of the campus away from Building 1, the original hospital. Subsequent additions to Building 2 also resulted in the loss of the formal campus entry.<sup>1</sup>

Lastly, the open greenspaces of the original campus, specifically the lawn north of Building 1, have been covered by modern construction and parking lots. VANTHCS does not concur that the campus or portions of the campus possesses the integrity necessary for listing in the NRHP under the Second Generation of Veterans Hospitals. Photos and maps documenting the development of the Dallas VAMC are included as Attachment B. VA requests your concurrence with these determinations concerning built resources.

#### Commitment to Document Buildings of Interest

While VANHCS maintains its determination that only Building 1, with Building 3 as a component, is eligible for the NRHP, VANTHCS will proceed with completing Historic American Buildings Survey (HABS) documentation of Buildings 5, 6, and 10 prior to their demolition, because of the interest in these buildings expressed by the THC and.

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<sup>1</sup> Adverse effects resolved through implementation of the *Memorandum of Agreement* executed May 2, 1990, by VA and the THC, and accepted by the Advisory Council on Historic Preservation on June 15, 1990.



the City of Dallas Office of Historic Preservation and previous commitments to document.

#### Assessment of Adverse Effect

Based on VA's assessment of Site 41DL499, VANTHCS has determined the Undertaking will not adversely affect archaeological historic properties. VANTHCS will include stipulations in the PA in the event of post-review/unanticipated discoveries. Based on VA's identification of Building 1, with Building 3 as a component, as eligible for individual listing in the NRHP, VANTHCS has determined construction and operation of the LTSCI clinical facility, warehouse, and CEMH parking garage will not adversely affect historic built resources based on their proposed locations. VANTHCS cannot assess potential adverse effects of construction and operation of the CEMH clinical facility until a design has been selected. VANTHCS therefore confirms its commitment to developing a PA as described by 36 CFR § 800.5(a)(3) and 36 CFR § 800.14(b) in consultation with your office and other Consulting Parties that will include design review to help avoid or minimize adverse effects of the proposed construction on Buildings 1 and 3, and, if adverse effects cannot be sufficiently minimized or avoided, develop mitigation to resolve adverse effects to the historic property.

#### Public Involvement

Pursuant to 36 CFR § 800.2(d), VANTHCS has provided information to the public and continues to seek comments on the Undertaking. On August 24, 2021, VANTHCS posted a request for information on its website. No responses were received through October 2021; the request is no longer available on the website. VANTHCS sought comments from the public on the Undertaking through notices in *The Dallas Morning News* from July 4<sup>th</sup> to 6<sup>th</sup>, 2021 as part of the ongoing National Environmental Policy Act (NEPA) process. No comments concerning cultural resources or historic properties were received. VANTHCS will continue to seek comments from the public through National Historic Preservation Act (NHPA) consultation and the NEPA process, including public reviews of the draft environmental assessment anticipated later this year.

VANTHCS invited the following Indian tribes, agencies, and organizations to participate in consultation: the Advisory Council on Historic Preservation (ACHP); the Apache Tribe of Oklahoma; Comanche Nation; Coushatta Tribe of Louisiana; Tonkawa Tribe; and the Wichita & Affiliated Tribes; the City of Dallas Office of Historic Preservation, as the Certified Local Government; the Dallas County Historical Commission; and Preservation Dallas. On December 1, 2021, VANTHCS hosted a Consulting Party meeting to discuss the Undertaking, the APE, the identification of historic properties, the assessment of adverse effects, and the development of the PA. Since this meeting, VANTHCS has received comments from the ACHP, your office, Preservation Dallas, and the Comanche Nation. During the December 2021 consultation meeting, the City of Dallas Office of Historic Preservation and your staff requested additional information about VANTHCS's selection of sites and development of plans for the proposed CEMH and

LTSCI facilities. VANTHCS provided this information to all invited parties on January 21, 2022. VANTHCS looks forward to additional consultation regarding this Undertaking.

### Continuing Consultation

Therefore, VANTHCS requests your concurrence with the delineation of the APE, identification of historic properties, and assessment of adverse effects to historic properties. A draft of the PA is included as Attachment C to this letter for review and comment. A copy was distributed to all invited parties. VANTHCS will host a virtual consultation meeting to continue discussion of the Undertaking and the development of the PA. VANTHCS proposes to hold the meeting in the first week of April 2022. Please respond to Karen Więckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your availability that week by March 25, 2022.

Thank you for your attention to this matter. Please contact Ms. Więckowski if you have any questions or require any additional information.

Sincerely,

FOR AND IN  
THE ABSENCE OF

  
Stephen R. Holt, MD, MPH, MSNRS  
Executive Medical Center Director

Enclosures

Attachment A – Archival Review  
Attachment B – Development of Dallas VAMC  
Attachment C – Draft PA

cc:

Héctor Abreu-Cintrón, Federal Preservation Officer, U.S. Department of Veterans Affairs  
Karen Więckowski, Project Manager, U.S. Department of Veterans Affairs  
Alex Toprac, Texas Historical Commission  
Caitlin Brashear, Texas Historical Commission  
Rebecca Shelton, Texas Historical Commission

**INTENDED AS AN EMAIL**

**Subj: Dallas VAMC Proposed Construction of CEMH and LTSCI Facilities**

**NOTICE TO ALL PARTIES**

Re: National Historic Preservation Act Section 106 Consultation Related to the Construction and Operation of Clinical Expansion of Mental Health (CEMH) and Long Term Spinal Cord Injury (LTSCI) at the U.S. Department of Veterans Affairs North Texas Health Care System – Dallas VA Medical Center, 4500 South Lancaster Road, Dallas, Dallas County, Texas

Thank you for your continued involvement in consultation related to the construction and operation of CEMH and LTSCI facilities at the U.S. Department of Veterans Affairs (VA) North Texas Health Care System (NTHCS) Dallas VA Medical Center (VAMC).

VANTHCS seeks to supersede the *Memorandum of Agreement Among the U.S. Department of Veterans Affairs, Texas Historical Commission and Advisory Council on Historic Preservation Regarding the Clinical Expansion for Mental Health & Long Term Spinal Cord Injury Projects at the Veterans Affairs North Texas Health Care System, Dallas, Texas* (MOA) executed January 22, 2013 and scheduled to expire January 22, 2023, with a programmatic agreement (PA) due to changes in the definition of the Undertaking. The revised Undertaking includes the construction of a CEMH clinical facility, a LTSCI clinical facility, a CEMH parking garage, and a warehouse including all associated infrastructure and utility improvements, including stormwater, telecom, and electrical. Although the design of the LTSCI clinical facility is largely decided and similar to the design proposed and consulted on in 2010, the design of the CEMH clinical facility is in development due to increased patient loads at the Dallas VAMC and recent changes in VA's design standards and guidelines. Given the state of the CEMH design and the need to phase assessment of adverse effects, VANTHCS formally notified the Texas Historical Commission (THC) and other potential Consulting Parties of the intent to develop a PA on November 19, 2021. This letter included a copy of the draft PA for review. VANTHCS is consulting with appropriate agencies, Tribes, and organizations in accordance with 36 CFR § 800.14(b) to develop the PA.

VANTHCS hosted a consultation meeting on December 1, 2021. During this meeting, the THC and the City of Dallas Office of Historic Preservation (DOHP) requested additional information concerning alternatives that may have reduced impacts to historic properties. VANTHCS provided this information via email on January 21, 2022.

VANTHCS received comments on the identification of historic properties from the THC and the DOHP following the consultation meeting and the close of the initial comment period. Copies of VANTHCS's responses to comments are attached to this transmission. VANTHCS maintains its determination that Building 1, with Building 3 as a component, is individually eligible for listing in the National Register of Historic Places under Criteria A and C. VANTHCS also received confirmation from the Advisory Council on Historic Preservation on December 2, 2021 that it would not participate in this consultation effort and notice from the Comanche Nation on January 6, 2022 that the Dallas VAMC campus does not contain identified historic properties of interest to the Comanche Nation.

A revised draft of the PA is included in this documentation for review and comment; VANTHCS requests response as soon as possible. VANTHCS will host a virtual consultation meeting to discuss the draft PA in the first week of April 2022. If you would like to participate, please respond to Karen Więckowski, VA Project Manager, at [Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov) with your availability that week by March 25, 2022.



VANTHCS has offered the opportunity to speak privately to federally-recognized Indian tribes requesting confidentiality.

Thank you for your attention to this matter. Please contact Ms. Więckowski if you have any questions or require any additional information.

Sincerely,

Dr. Stephen R. Holt

Hospital Director

Enc: Draft PA

Cc:

Héctor Abreu-Cintrón, Federal Preservation Officer, U.S. Department of Veterans Affairs

Karen Więckowski, Project Manager, U.S. Department of Veterans Affairs

**From:** [noreply@thc.state.tx.us](mailto:noreply@thc.state.tx.us)  
**To:** [Wieckowski, Karen \(CFM\)](#); [reviews@thc.state.tx.us](mailto:reviews@thc.state.tx.us)  
**Subject:** [EXTERNAL] Section 106 Submission  
**Date:** Thursday, April 7, 2022 4:08:09 PM

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**Re:** Project Review under Section 106 of the National Historic Preservation Act  
**THC Tracking #202207692**

**Date:** 04/07/2022

LTSCI & CEMH Dallas  
4500 S. Lancaster

**Description:** Response to THC & DOHP in preparation of Programmatic Agreement between the VA concerning the VA North Texas Health Care System in Dallas.

Dear Karen Wieckowski:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Rebecca Shelton, Alex Toprac and Caitlin Brashear, has completed its review and has made the following determinations based on the information submitted for review:

**Above-Ground Resources**

- Property/properties are eligible for listing or already listed in the National Register of Historic Places.
- Adverse effects on historic properties.

We have the following comments: The History Programs Division review staff, led by Caitlin Brashear, concurs with the Area of Potential Effect (APE), to include the whole of the Dallas VAMC located at 4500 South Lancaster Road, as defined in the correspondence we received on March 8, 2022. Further, we have reviewed all past recommendations for built resources as provided by your office, and we concur that Building 1 with Building 3 as a component is Eligible for individual listing in the National Register of Historic Places (NRHP). Finally, we concur that, based on the information provided, the historic district that our office previously recommended is Not Eligible for NRHP listing due to a lack of integrity owing to the cumulative development of the Dallas VAMC over the past thirty (30) years. The Division of Architecture review staff, led by Alex Toprac, has determined that the undertaking now presents a cumulative adverse effect to the formerly NHRP-eligible Dallas VAMC historic district and the NRHP-individually eligible Building 1 & Building 3. The Archeology Division review staff, led by Rebecca Shelton, concurs that historic site 41DL499 is ineligible for listing on the NRHP due to lack of integrity. The Texas Historical Commission review

staff has provided, via email, in-depth comments and revisions regarding the aforementioned change in eligibility determination and the associated cumulative adverse effect determination within the submitted draft Programmatic Agreement, and look forward to further consultation with the Veterans Administration staff regarding our feedback.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: [rebecca.shelton@thc.texas.gov](mailto:rebecca.shelton@thc.texas.gov), [alex.toprac@thc.texas.gov](mailto:alex.toprac@thc.texas.gov), [caitlin.brashear@thc.texas.gov](mailto:caitlin.brashear@thc.texas.gov).

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,



for Mark Wolfe, State Historic Preservation Officer  
Executive Director, Texas Historical Commission

**Please do not respond to this email.**

---

**From:** Wieckowski, Karen (CFM)  
**Sent:** Wednesday, April 27, 2022 4:55 PM  
**To:** Caitlin Brashear <[Caitlin.Brashear@thc.texas.gov](mailto:Caitlin.Brashear@thc.texas.gov)>; Rebecca Shelton <[Rebecca.Shelton@thc.texas.gov](mailto:Rebecca.Shelton@thc.texas.gov)>; Alex Toprac <[Alex.Toprac@thc.texas.gov](mailto:Alex.Toprac@thc.texas.gov)>  
**Cc:** Mcardle, Angela B. (CFM) (she/her/hers) <[Angela.McArdle@va.gov](mailto:Angela.McArdle@va.gov)>; Abreu, Hector M. <[Hector.Abreu@va.gov](mailto:Hector.Abreu@va.gov)>; Zelenka, Karen (<[Karen.Zelenka@va.gov](mailto:Karen.Zelenka@va.gov)>) <[Karen.Zelenka@va.gov](mailto:Karen.Zelenka@va.gov)>; Romero, Ruben (CFM) <[Ruben.Romero@va.gov](mailto:Ruben.Romero@va.gov)>  
**Subject:** FW: [EXTERNAL] Project Review Submission

Hello,

For your review & approval, I have uploaded into the eTRAC, the attached PA that was revised per your comments on April 7, 2022 & as discussed on April 25, 2022. The eTRAC # is noted below & copy of document is also attached herewith.

Thank you for cooperation & assistance in preparation of this PA.

Please advise at your earliest convenience if you have any concerns with this submission.

*KarenAWieckowski*

Project Manager VA CFM  
202-445-8901

---

**From:** [noreply@thc.state.tx.us](mailto:noreply@thc.state.tx.us) <[noreply@thc.state.tx.us](mailto:noreply@thc.state.tx.us)>  
**Sent:** Wednesday, April 27, 2022 4:47 PM  
**To:** Wieckowski, Karen (CFM) <[Karen.Wieckowski@va.gov](mailto:Karen.Wieckowski@va.gov)>  
**Subject:** [EXTERNAL] Project Review Submission

Project Review Submission: LTSCI & CEMH Dallas

**Tracking Number:** 202209511

**Due Date:** 5/27/2022 4:47:29 PM

**TEXAS HISTORICAL COMMISSION**

**Do Not Respond to This Email**

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



## **APPENDIX D – SITE PHOTOGRAPHS**

## SITE PHOTOGRAPHS LTSCI SITE – ADJOINING PROPERTIES



Photo #1: Looking westerly at the main entrance to Building 74 (Spinal Cord Injury Center).



Photo #2: Looking south across the LTSCI Site from parking lot 19.



Photo #3: Looking southeast across the LTSCI Site from parking lot 19.



Photo #4: Looking southwest across the LTSCI Site from parking lot 19.



Photo #5: Looking west across the LTSCI Site from parking lot 20.



Photo #6: Looking northeast across the LTSCI Site from parking lot 20.

## SITE PHOTOGRAPHS LTSCI SITE – ADJOINING PROPERTIES



Photo #7: North adjoining Building 43 (Research and Education).



Photo #8: Northeast adjoining Building 82 (Freedom Parking Garage).



Photo #9: Northeast adjoining Building 70 (Energy Center).



Photo #10: Southeast adjoining Building 79 (Fisher House).



Photo #11: South adjoining parking lots 22 and 27.



Photo #12: West adjoining parking lot 21.



## SITE PHOTOGRAPHS WAREHOUSE SITE – ADJOINING PROPERTIES



Photo #1: Looking northerly at the south and west sides of Building 12 (Laundry).



Photo #2: Looking southwesterly across the east side of Building 12.



Photo #3: Looking southeasterly at a shed located between Buildings 12 and 27 and the north side of Building 12.



Photo #4: Looking east at the west side of Building 27



Photo #5: Looking northerly at the west and south sides of Building 10 and a shed located south of Building 10.



Photo #6: Looking northwest across the east side of Building 10.



## SITE PHOTOGRAPHS WAREHOUSE SITE – ADJOINING PROPERTIES



Photo #7: North adjoining residence.



Photo #8: Northeast adjoining church.



Photo #9: East adjoining vacant land.



Photo #10: Southeast adjoining Elementary School (4601 Veterans Drive).



Photo #11: Southeast adjoining Dallas VAMC campus fueling station.



Photo #12: South adjoining Dallas VAMC campus electrical substation.

## SITE PHOTOGRAPHS WAREHOUSE SITE – ADJOINING PROPERTIES



Photo #13: Southwest adjoining Building 68 (Engineering Storage and Supply Management).



Photo #14: West adjoining Building 11 (Engineering Shops).



Photo #15: West adjoining Building 13 (Garage and Engineering Shops).



Photo #16: West adjoining Building 18 (Pump and Meter House).



## SITE PHOTOGRAPHS CEMH SITE



Photo #1: Looking southeasterly across the western portion of the CEMH Site.



Photo #2: Looking southwesterly across the western portion of the CEMH Site.



Photo #3: Looking southwesterly across the southern grassy portion of the CEMH Site.



Photo #4: Looking southeasterly at the west side of Building TT-51 (Workforce Solutions offices).



Photo #5: Looking northerly across the west side of Building 45 (Fiscal, Accounting, and Compliance offices).



Photo #6: Looking southwesterly across the east side of Building 45.

## SITE PHOTOGRAPHS CEMH SITE



Photo #7: Looking southerly across the northeastern portion of Building 44 (Warehouse)



Photo #8: Looking southeasterly at the northwestern portion of Building 44.



Photo #9: Looking easterly across the south side of Building 44.



Photo #10: Looking westerly across the east side of Building 44.



Photo #11: Looking easterly at the west side of Building TT-46 (Fiscal offices).



Photo #12: Looking northwesterly at the south side of Building TT-47 (Fiscal System offices).



## SITE PHOTOGRAPHS CEMH SITE – ADJOINING PROPERTIES



Photo #13: Northerly adjoining parking lot with CEMH Surface Parking Site beyond.



Photo #14: Northeasterly adjoining Building 80 (Liberty Parking Garage).



Photo #15: Easterly adjoining Building 69 (Readjustment Counseling Services, right) and Building 7 (Texas Tech University Health Science Center, center).



Photo #16: South adjoining Building 43 (Research).



Photo #17: South adjoining Building 3 (Research Labs, left) and Building 1 (Behavioral Health, right).



Photo #18: West adjoining Building 60 (Community Living Center).

## SITE PHOTOGRAPHS CEMH GARAGE SITE



Photo #1: Looking northerly across the CEMH Garage Site.



Photo #2: Looking northerly across the northern portion of the CEMH Garage Site.



Photo #3: Looking northwesterly across the central portion of the CEMH Garage Site.



Photo #4: Looking southerly across the CEMH Garage Site.



Photo #5: Looking easterly across the CEMH Garage Site.



Photo #6: Looking northerly across the CEMH Garage Site.



## SITE PHOTOGRAPHS CEMH GARAGE SITE – ADJOINING PROPERTIES



Photo #7: North adjoining parking lot and Building 81 (Patriot Parking Garage) beyond.



Photo #8: Northeast adjoining Building 75 (Daycare and Community Center).



Photo #9: Easterly adjoining Building 60 (Community Living Center).



Photo #10: Southerly adjoining Building 2 (Main Hospital/Clinical Addition).



Photo #11: Westerly adjoining South Lancaster Road with a commuter train.



Photo #12: Westerly adjoining multi-tenant shopping retail plaza located beyond South Lancaster Road.

## SITE PHOTOGRAPHS NORTH AREA SITE – ADJOINING PROPERTIES



Photo #1: Looking northwesterly across the south side of Building 6 (Day Treatment Center).



Photo #2: Looking southeasterly at the west side of Building 6.



Photo #3: Looking southwesterly across the north side of Building 6.



Photo #4: Looking southwesterly across the north and east sides of Building TT-49.



Photo #5: Looking northwesterly at the south and east sides of Building 5.



Photo #6: Looking southerly at the north side of Building 5.



## SITE PHOTOGRAPHS NORTH AREA SITE – ADJOINING PROPERTIES



Photo #7: Looking northwesterly across the south side of Building 8 (EAP, VERA, Police, Nursing, Facility Planner, and Credentialing).



Photo #9: Looking northwesterly across the south side of Building 9 (Engineering Services, Admin, and Support Staff).



Photo #11: Northerly adjoining parking lot.



Photo #8: Looking southeasterly across the north side of Building 8A.



Photo #50: Looking southeasterly across the north and west sides of the Building 9 attached addition section (Section 9A).



Photo #12: Northerly adjoining parking lot.

## SITE PHOTOGRAPHS NORTH AREA SITE – ADJOINING PROPERTIES



Photo #13: Vacant commercial building (2007 Ann Arbor Avenue) located beyond the northerly adjoining parking lot.



Photo #14: Northeasterly located residences located beyond the northerly adjoining parking lot.



Photo #15: Easterly adjoining Building 80 (Liberty Parking Garage).



Photo #16: Southerly adjoining parking lot.



Photo #17: Southwesterly adjoining parking lot.



Photo #18: Westerly adjoining Building 60 (Community Living Center).

## **APPENDIX E – IPAC REPORT AND TEXAS PARKS & WILDLIFE INFORMATION**





## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Arlington Ecological Services Field Office  
2005 Ne Green Oaks Blvd  
Suite 140

Arlington, TX 76006-6247

Phone: (817) 277-1100 Fax: (817) 277-1129

<http://www.fws.gov/southwest/es/arlingontexas/>

<http://www.fws.gov/southwest/es/EndangeredSpecies/lists/>

In Reply Refer To:

May 04, 2021

Consultation Code: 02ETAR00-2021-SLI-1862

Event Code: 02ETAR00-2021-E-04080

Project Name: LTSCI and CEMH Projects

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, which may occur within the boundary of your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under section 7(a)(1) of the Act, Federal agencies are directed to utilize their authorities to carry out programs for the conservation of threatened and endangered species. Under and 7(a)(2) and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to determine whether their actions may affect threatened and endangered species and/or designated critical habitat. A Federal action is an activity or program authorized, funded, or carried out, in whole or in part, by a Federal agency (50 CFR 402.02).

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For Federal actions other than major construction activities, the Service suggests that a biological evaluation (similar to a Biological Assessment) be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.



After evaluating the potential effects of a proposed action on federally listed species, one of the following determinations should be made by the Federal agency:

1. *No effect* - the appropriate determination when a project, as proposed, is anticipated to have no effects to listed species or critical habitat. A "no effect" determination does not require section 7 consultation and no coordination or contact with the Service is necessary. However, the action agency should maintain a complete record of their evaluation, including the steps leading to the determination of effect, the qualified personnel conducting the evaluation, habitat conditions, site photographs, and any other related information.
2. *May affect, but is not likely to adversely affect* - the appropriate determination when a proposed action's anticipated effects are insignificant, discountable, or completely beneficial. Insignificant effects relate to the size of the impact and should never reach the scale where "take" of a listed species occurs. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not be able to meaningfully measure, detect, or evaluate insignificant effects, or expect discountable effects to occur. This determination requires written concurrence from the Service. A biological evaluation or other supporting information justifying this determination should be submitted with a request for written concurrence.
3. *May affect, is likely to adversely affect* - the appropriate determination if any adverse effect to listed species or critical habitat may occur as a direct or indirect result of the proposed action, and the effect is not discountable or insignificant. This determination requires formal section 7 consultation.

The Service recommends that candidate species, proposed species, and proposed critical habitat be addressed should consultation be necessary. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at: <http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the wind energy

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guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

For additional information concerning migratory birds and eagle conservation plans, please contact the Service's Migratory Bird Office at 505-248-7882.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Arlington Ecological Services Field Office**

2005 Ne Green Oaks Blvd

Suite 140

Arlington, TX 76006-6247

(817) 277-1100

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## Project Summary

Consultation Code: 02ETAR00-2021-SLI-1862

Event Code: 02ETAR00-2021-E-04080

Project Name: LTSCI and CEMH Projects

Project Type: DEVELOPMENT

Project Description: LTSCI and CEMH Projects

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.694728999999995,-96.78893505866537,14z>



Counties: Dallas County, Texas

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## Endangered Species Act Species

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 2 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Birds

NAME	STATUS
Golden-cheeked Warbler (=wood) <i>Dendroica chrysoparia</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/33">https://ecos.fws.gov/ecp/species/33</a>	Endangered
Piping Plover <i>Charadrius melodus</i> Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is <b>final</b> critical habitat for this species. The location of the critical habitat is not available. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> <li>▪ Wind Energy Projects</li> </ul> Species profile: <a href="https://ecos.fws.gov/ecp/species/6039">https://ecos.fws.gov/ecp/species/6039</a>	Threatened
Red Knot <i>Calidris canutus rufa</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> <li>▪ Wind Energy Projects</li> </ul> Species profile: <a href="https://ecos.fws.gov/ecp/species/1864">https://ecos.fws.gov/ecp/species/1864</a>	Threatened
Whooping Crane <i>Grus americana</i> Population: Wherever found, except where listed as an experimental population There is <b>final</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/758">https://ecos.fws.gov/ecp/species/758</a>	Endangered

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## Clams

NAME	STATUS
Texas Fawnsfoot <i>Truncilla macrodon</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/8965">https://ecos.fws.gov/ecp/species/8965</a>	Candidate

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

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# IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

## Project information

### NAME

LTSCI and CEMH Projects

### LOCATION

Dallas County, Texas





# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Log in to IPaC.
2. Go to your My Projects list.
3. Click PROJECT HOME for this project.
4. Click REQUEST SPECIES LIST.

Listed species<sup>1</sup> and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries<sup>2</sup>).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

## Birds

NAME	STATUS
<b>Golden-cheeked Warbler (=wood)</b> <i>Dendroica chrysoparia</i> Wherever found No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/33">https://ecos.fws.gov/ecp/species/33</a>	Endangered
<b>Piping Plover</b> <i>Charadrius melodus</i> This species only needs to be considered if the following condition applies: <ul style="list-style-type: none"><li>• Wind Energy Projects</li></ul> There is <b>final</b> critical habitat for this species. The location of the critical habitat is not available. <a href="https://ecos.fws.gov/ecp/species/6039">https://ecos.fws.gov/ecp/species/6039</a>	Threatened
<b>Red Knot</b> <i>Calidris canutus rufa</i> Wherever found This species only needs to be considered if the following condition applies: <ul style="list-style-type: none"><li>• Wind Energy Projects</li></ul> No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/1864">https://ecos.fws.gov/ecp/species/1864</a>	Threatened

Whooping Crane *Grus americana*

Endangered

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<https://ecos.fws.gov/ecp/species/758>

## Clams

NAME

STATUS

Texas Fawnsfoot *Truncilla macrodon*

Candidate

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/8965>

## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

## Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.

2. The [Bald and Golden Eagle Protection Act](#) of 1940.



Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)



This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

## Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort (I)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

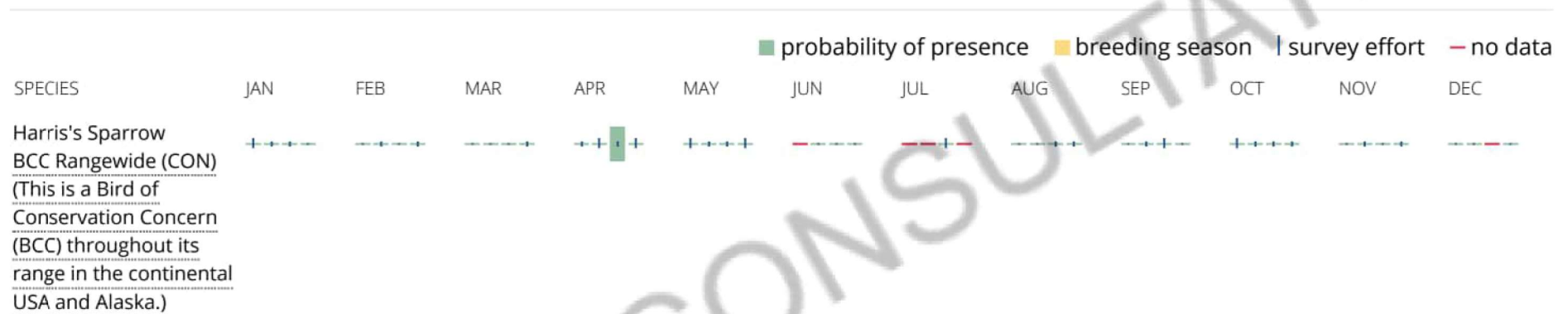
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

### No Data (—)

A week is marked as having no data if there were no survey events for that week.

### Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.



### What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

### What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

### How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore

energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### **What if I have eagles on my list?**

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### **Proper Interpretation and Use of Your Migratory Bird Report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.



# Facilities

## National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

## Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

## Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

**Data limitations**

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

### **Data exclusions**

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

### **Data precautions**

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Arlington Ecological Services Field Office  
2005 Ne Green Oaks Blvd  
Suite 140

Arlington, TX 76006-6247

Phone: (817) 277-1100 Fax: (817) 277-1129

<http://www.fws.gov/southwest/es/arlingtontexas/>

<http://www.fws.gov/southwest/es/EndangeredSpecies/lists/>

IPaC Record Locator: 889-103496322

July 01, 2021

Subject: Consistency letter for 'LTSCI and CEMH Projects' for specified federally threatened and endangered species and designated critical habitat that may occur in your proposed project area consistent with the Arlington Ecological Services Field Office (ESFO) Determination Key (DKey) for project review and guidance for federally listed species.

Paul Jackson:

The U.S. Fish and Wildlife Service (Service) received on **July 01, 2021** your effects determination for the 'LTSCI and CEMH Projects' (the Action) using the Arlington ESFO DKey for project review and guidance for federally-listed species within the Information for Planning and Consultation (IPaC) system. The Service developed this system in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Based on your answers and the assistance of the Service's Arlington ESFO DKey, you determined the proposed Action will have "No Effect" on the following species:

Species	Listing Status	Determination
Golden-cheeked Warbler (=wood) ( <i>Dendroica chrysoparia</i> )	Endangered	No effect
Piping Plover ( <i>Charadrius melodus</i> )	Threatened	No effect
Red Knot ( <i>Calidris canutus rufa</i> )	Threatened	No effect
Whooping Crane ( <i>Grus americana</i> )	Endangered	No effect

### Consultation Status

Thank you for informing the Service of your "No Effect" determinations for this project. No further consultation/coordination for this project is required for these species.

This letter only covers the listed species in the above table. The following candidate species that may also occur in the Action area:

- Texas Fawnsfoot *Truncilla macrodon* Candidate

Candidate species are not afforded protection under the ESA; however, we recommend they be considered in project planning and that conservation measures be implemented to avoid or minimize impacts to individuals or their habitat as much as possible.

The Service recommends that your agency contact the Arlington ESFO or re-evaluate the Action in IPaC if: 1) the scope, timing, duration, or location of the Action changes, 2) new information reveals the Action may affect listed species or designated critical habitat, or 3) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Arlington ESFO should take place before project changes are final or resources committed.

The proposed project is within the range of the black-capped vireo (*Vireo atricapilla*). The black-capped vireo was removed from the List of Endangered and Threatened Wildlife due to recovery on May 16, 2018. Although the black-capped vireo is no longer protected under the ESA, the Service continues to monitor its status as described in the post-delisting monitoring plan for the species (<https://www.fws.gov/southwest/es/arlingtontexas/>). As such, we encourage new information related the species' occurrence, and any threats, to be submitted to the Arlington ESFO for consideration in the post-delisting monitoring effort.

**At Risk Species:** The Service's responsibilities under the ESA include evaluating species that have been petitioned to be listed or are candidates for listing under the ESA. These "at risk" species are not afforded protection under the ESA; however, we continue to collect information on their status and potential threats in order to assess their biological status and address requirements under the ESA. For these reasons, we request any information on the status of these species (e.g., surveys) be provided to the Arlington ESFO for consideration. This may also include any conservation measures implemented to avoid or reduce impacts to these species as a result of proposed actions. The proposed project falls within the range of the following at risk species:

Texas heelsplitter (<https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=F02K>)

Texas fawnsfoot (<https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=F04E>)

Western chicken turtle (<https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=9903>)

**Bald and Golden Eagle Protection Act(BGEPA):** The following resources are provided to project proponents and consulting agencies as additional information. Bald and golden eagles are not included in this section 7(a)(2) consultation and this information does not constitute a determination of effects by the Service.

The Service developed the National Bald Eagle Management Guidelines to advise landowners, land managers, and others who share public and private lands with bald eagles when and under what circumstances the protective provisions of the BGEPA may apply to their activities. The guidelines should be consulted prior to conducting new or intermittent activity near an eagle nest.

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This document may be downloaded from the following site: <https://www.fws.gov/migratorybirds/pdf/management/nationalbaldeaglenanagementguidelines.pdf>

If the recommendations detailed in the National Bald Eagle Management Guidelines cannot be followed, you may apply for a permit to authorize removal or relocation of an eagle nest in certain instances. The application form is located at <http://www.fws.gov/forms/3-200-72.pdf>.

Please note this guidance does not authorize bird mortality for species that are protected under the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. sec. 703-712). If you believe migratory birds will be affected by this activity, we recommend you contact our Migratory Bird Permit Office at P.O. Box 709, Albuquerque, NM 87103, (505) 248-7882.

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## Qualification Interview

1. Is the action authorized, funded, or being carried out by a Federal agency?

Yes

2. Are you the Federal agency or designated non-federal representative?

Yes

3. Is this a wind energy project ?

No

4. Is this a solar energy project ?

No

5. [Semantic] Does the project intersect the piping plover AOI?

**Automatically answered**

Yes

6. [Semantic] Does the project intersect the red knot AOI?

**Automatically answered**

Yes

7. [Semantic] Does the project intersect the Golden-cheeked Warbler AOI?

**Automatically answered**

Yes

8. Does the action area (including all temporary rights-of-way, storage spaces, borrow areas, etc.) encompass or overlap with oak-juniper woodland habitat as defined in [Management Guidelines for the Golden-cheeked Warblers?](#)

No

9. Is the action area (including all temporary rights-of-way, storage spaces, borrow areas, etc.) located within 300 feet of oak-juniper woodland habitat?

No

10. [Semantic] Does the project intersect the whooping crane AOI?

**Automatically answered**

Yes

11. Does the action area have habitat that may be used by whooping cranes during spring and fall migrations (Mar 19- Apr 30, Oct 20 – Nov 24)?

**Note:** Note: Whooping crane habitat includes croplands and grasslands interspersed with wetlands such as lakes, ponds and rivers. The portion of water bodies used by whooping cranes tend to be shallow (up to 20 inches in depth). More information on stopover habitat can be found here: <https://pubs.er.usgs.gov/publication/70202378>.

No

12. [Semantic] Does the project intersect the black-capped vireo range?

**Automatically answered**

Yes

---

13. [Semantic] Does the project intersect the Texas kangaroo rat range?  
**Automatically answered**  
*No*
14. [Semantic] Does the project intersect the lesser prairie-chicken range?  
**Automatically answered**  
*No*
15. [Semantic] Does the project intersect the alligator snapping turtle range?  
**Automatically answered**  
*No*
16. [Semantic] Does the project intersect the Texas screwstem range?  
**Automatically answered**  
*No*
17. [Semantic] Does the project intersect the peppered chub range?  
**Automatically answered**  
*No*
18. [Semantic] Does the project intersect the Texas heelsplitter range?  
**Automatically answered**  
*Yes*
19. [Semantic] Does the project intersect the Louisiana pigtoe range?  
**Automatically answered**  
*No*
20. [Semantic] Does the project intersect the Texas fawnsfoot range?  
**Automatically answered**  
*Yes*
21. [Semantic] Does the project intersect the western chicken turtle range?  
**Automatically answered**  
*Yes*
-



Last Update: 6/22/2021

## DALLAS COUNTY

### AMPHIBIANS

**eastern tiger salamander** *Ambystoma tigrinum*

Terrestrial adults generally occur under cover objects or in burrows surrounding a variety of lentic freshwater habitats, such as ponds, lakes, bottomland wetlands, or upland ephemeral pools. The specific terrestrial habitats are also varied and the occurrence of this species seems to be more closely associated with sandy, loamy or other soils which have easy burrowing properties, rather than any particular ecological system type. Requires fishless breeding pools for successful reproduction.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S5

**spotted dusky salamander** *Desmognathus conanti*

This species occurs in association with aquatic habitats in forested areas. Small, clear, spring fed streams with sandy substrate bordered with ferns and moss as well as murky, stagnant water bodies in cypress swamps, baygalls, and flood plains in bottomland forests support populations of this species.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S1

**Strecker's chorus frog** *Pseudacris streckeri*

Terrestrial and aquatic: Wooded floodplains and flats, prairies, cultivated fields and marshes. Likes sandy substrates.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3

**Woodhouse's toad** *Anaxyrus woodhousii*

Terrestrial and aquatic: A wide variety of terrestrial habitats are used by this species, including forests, grasslands, and barrier island sand dunes. Aquatic habitats are equally varied.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: SU

### BIRDS

**bald eagle** *Haliaeetus leucocephalus*

Found primarily near rivers and large lakes; nests in tall trees or on cliffs near water; communally roosts, especially in winter; hunts live prey, scavenges, and pirates food from other birds

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3B,S3N

**black rail** *Laterallus jamaicensis*

Salt, brackish, and freshwater marshes, pond borders, wet meadows, and grassy swamps; nests in or along edge of marsh, sometimes on damp ground, but usually on mat of previous years dead grasses; nest usually hidden in marsh grass or at base of Salicornia

Federal Status: LT	State Status: T	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: S2

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## DALLAS COUNTY

### BIRDS

**black-capped vireo** *Vireo atricapilla*

Oak-juniper woodlands with distinctive patchy, two-layered aspect; shrub and tree layer with open, grassy spaces; requires foliage reaching to ground level for nesting cover; return to same territory, or one nearby, year after year; deciduous and broad-leaved shrubs and trees provide insects for feeding; species composition less important than presence of adequate broad-leaved shrubs, foliage to ground level, and required structure; nesting season March-late summer

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: S3B

**chestnut-collared longspur** *Calcarius ornatus*

According to Partners in Flight's Landbird Conservation Plan (2016), this species has a continental decline of 85%. Occurs in open shortgrass settings especially in patches with some bare ground. Also occurs in grain sorghum fields and Conservation Reserve Program lands

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3

**Franklin's gull** *Leucophaeus pipixcan*

This species is only a spring and fall migrant throughout Texas. It does not breed in or near Texas. Winter records are unusual consisting of one or a few individuals at a given site (especially along the Gulf coastline). During migration, these gulls fly during daylight hours but often come down to wetlands, lake shore, or islands to roost for the night.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S2N

**golden-cheeked warbler** *Setophaga chrysoparia*

Ashe juniper in mixed stands with various oaks (*Quercus* spp.). Edges of cedar brakes. Dependent on Ashe juniper (also known as cedar) for long fine bark strips, only available from mature trees, used in nest construction; nests are placed in various trees other than Ashe juniper; only a few mature junipers or nearby cedar brakes can provide the necessary nest material; forage for insects in broad-leaved trees and shrubs; nesting late March-early summer.

Federal Status: LE	State Status: E	SGCN: Y
Endemic: N	Global Rank: G2	State Rank: S2S3B

**interior least tern** *Sternula antillarum athalassos*

Sand beaches, flats, bays, inlets, lagoons, islands. Subspecies is listed only when inland (more than 50 miles from a coastline); nests along sand and gravel bars within braided streams, rivers; also know to nest on man-made structures (inland beaches, wastewater treatment plants, gravel mines, etc); eats small fish and crustaceans, when breeding forages within a few hundred feet of colony

Federal Status: DL: Delisted	State Status: E	SGCN: N
Endemic: N	Global Rank: G4T3Q	State Rank: S1B

**piping plover** *Charadrius melodus*

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## DALLAS COUNTY

### BIRDS

Beaches, sandflats, and dunes along Gulf Coast beaches and adjacent offshore islands. Also spoil islands in the Intracoastal Waterway. Based on the November 30, 1992 Section 6 Job No. 9.1, Piping Plover and Snowy Plover Winter Habitat Status Survey, algal flats appear to be the highest quality habitat. Some of the most important aspects of algal flats are their relative inaccessibility and their continuous availability throughout all tidal conditions. Sand flats often appear to be preferred over algal flats when both are available, but large portions of sand flats along the Texas coast are available only during low-very low tides and are often completely unavailable during extreme high tides or strong north winds. Beaches appear to serve as a secondary habitat to the flats associated with the primary bays, lagoons, and inter-island passes. Beaches are rarely used on the southern Texas coast, where bayside habitat is always available, and are abandoned as bayside habitats become available on the central and northern coast. However, beaches are probably a vital habitat along the central and northern coast (i.e. north of Padre Island) during periods of extreme high tides that cover the flats. Optimal site characteristics appear to be large in area, sparsely vegetated, continuously available or in close proximity to secondary habitat, and with limited human disturbance.

Federal Status: LT	State Status: T	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: S2N

#### **rufa red knot** *Calidris canutus rufa*

Red knots migrate long distances in flocks northward through the contiguous United States mainly April-June, southward July-October. A small plump-bodied, short-necked shorebird that in breeding plumage, typically held from May through August, is a distinctive and unique pottery orange color. Its bill is dark, straight and, relative to other shorebirds, short-to-medium in length. After molting in late summer, this species is in a drab gray-and-white non-breeding plumage, typically held from September through April. In the non-breeding plumage, the knot might be confused with the omnipresent Sanderling. During this plumage, look for the knot's prominent pale eyebrow and whitish flanks with dark barring. The Red Knot prefers the shoreline of coast and bays and also uses mudflats during rare inland encounters. Primary prey items include coquina clam (*Donax* spp.) on beaches and dwarf surf clam (*Mulinia lateralis*) in bays, at least in the Laguna Madre. Wintering Range includes-Aransas, Brazoria, Calhoun, Cameron, Chambers, Galveston, Jefferson, Kennedy, Kleberg, Matagorda, Nueces, San Patricio, and Willacy. Habitat: Primarily seacoasts on tidal flats and beaches, herbaceous wetland, and Tidal flat/shore.

Federal Status: LT	State Status: T	SGCN: Y
Endemic: N	Global Rank: G4T2	State Rank: S2N

#### **western burrowing owl** *Athene cunicularia hypugaea*

Open grasslands, especially prairie, plains, and savanna, sometimes in open areas such as vacant lots near human habitation or airports; nests and roosts in abandoned burrows

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4T4	State Rank: S2

#### **white-faced ibis** *Plegadis chihi*

Prefers freshwater marshes, sloughs, and irrigated rice fields, but will attend brackish and saltwater habitats; currently confined to near-coastal rookeries in so-called hog-wallow prairies. Nests in marshes, in low trees, on the ground in bulrushes or reeds, or on floating mats.

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S4B

#### **whooping crane** *Grus americana*

Small ponds, marshes, and flooded grain fields for both roosting and foraging. Potential migrant via plains throughout most of state to coast; winters in coastal marshes of Aransas, Calhoun, and Refugio counties.

Federal Status: LE	State Status: E	SGCN: Y
Endemic: N	Global Rank: G1	State Rank: S1N

#### **wood stork** *Mycteria americana*

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## DALLAS COUNTY

### BIRDS

Prefers to nest in large tracts of baldcypress (*Taxodium distichum*) or red mangrove (*Rhizophora mangle*); forages in prairie ponds, flooded pastures or fields, ditches, and other shallow standing water, including salt-water; usually roosts communally in tall snags, sometimes in association with other wading birds (i.e. active heronries); breeds in Mexico and birds move into Gulf States in search of mud flats and other wetlands, even those associated with forested areas; formerly nested in Texas, but no breeding records since 1960

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: SHB,S2N

### CRUSTACEANS

**a cave obligate isopod** *Caecidotea bilineata*

Spring obligate. *Caecidotea bilineata* is known only from non-cave groundwater habitats in deposits of Cretaceous age. It is presumably a phreatobite. Fine scale habitat requirements unknown.

Federal Status:	State Status:	SGCN: Y
Endemic: Y	Global Rank: G2G3	State Rank: S1

### FISH

**american eel** *Anguilla rostrata*

Originally found in all river systems from the Red River to the Rio Grande. Aquatic habitats include large rivers, streams, tributaries, coastal watersheds, estuaries, bays, and oceans. Spawns in Sargasso Sea, larva move to coastal waters, metamorphose, and begin upstream movements. Females tend to move further upstream than males (who are often found in brackish estuaries). American Eel are habitat generalists and may be found in a broad range of habitat conditions including slow- and fast-flowing waters over many substrate types. Extirpation in upstream drainages attributed to reservoirs that impede upstream migration.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: S4

**Mississippi silvery minnow** *Hybognathus nuchalis*

Found in eastern Texas streams, from the Brazos River eastward and northward to the Red River; found in moderate current; silty, muddy, or rocky substrate. In Texas, adults likely to inhabit smaller tributary streams.

Federal Status:	State Status:	SGCN: Y
Endemic:	Global Rank: G5	State Rank: S4

### INSECTS

**American bumblebee** *Bombus pensylvanicus*

Habitat description is not available at this time.

Federal Status:	State Status:	SGCN: Y
Endemic:	Global Rank: G3G4	State Rank: SNR

**Comanche harvester ant** *Pogonomyrmex comanche*

Habitat description is not available at this time.

Federal Status:	State Status:	SGCN: Y
Endemic: Y	Global Rank: G2G3	State Rank: S2

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## DALLAS COUNTY

### INSECTS

**No accepted common name** *Arethaea ambulator*

Habitat description is not available at this time.

Federal Status:	State Status:	SGCN: Y
Endemic:	Global Rank: GNR	State Rank: SNR

### MAMMALS

**big brown bat** *Eptesicus fuscus*

Any wooded areas or woodlands except south Texas. Riparian areas in west Texas.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S5

**cave myotis bat** *Myotis velifer*

Colonial and cave-dwelling; also roosts in rock crevices, old buildings, carports, under bridges, and even in abandoned Cliff Swallow (*Hirundo pyrrhonota*) nests; roosts in clusters of up to thousands of individuals; hibernates in limestone caves of Edwards Plateau and gypsum cave of Panhandle during winter; opportunistic insectivore.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4G5	State Rank: S2S3

**eastern red bat** *Lasiurus borealis*

Red bats are migratory bats that are common across Texas. They are most common in the eastern and central parts of the state, due to their requirement of forests for foliage roosting. West Texas specimens are associated with forested areas (cottonwoods). Also common along the coastline. These bats are highly mobile, seasonally migratory, and practice a type of "wandering migration". Associations with specific habitat is difficult unless specific migratory stopover sites or wintering grounds are found. Likely associated with any forested area in East, Central, and North Texas but can occur statewide.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3G4	State Rank: S4

**eastern spotted skunk** *Spilogale putorius*

Generalist; open fields prairies, croplands, fence rows, farmyards, forest edges & woodlands. Prefer wooded, brushy areas & tallgrass prairies. S.p. ssp. interrupta found in wooded areas and tallgrass prairies, preferring rocky canyons and outcrops when such sites are available.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: S1S3

**hoary bat** *Lasiurus cinereus*

Hoary bats are highly migratory, high-flying bats that have been noted throughout the state. Females are known to migrate to Mexico in the winter, males tend to remain further north and may stay in Texas year-round. Commonly associated with forests (foliage roosting species) but are found in unforested parts of the state and lowland deserts. Tend to be captured over water and large, open flyways.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3G4	State Rank: S4

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## DALLAS COUNTY

### MAMMALS

#### **long-tailed weasel**

*Mustela frenata*

Includes brushlands, fence rows, upland woods and bottomland hardwoods, forest edges & rocky desert scrub. Usually live close to water.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5

State Rank: S5

#### **mountain lion**

*Puma concolor*

Generalist; found in a wide range of habitats statewide. Found most frequently in rugged mountains & riparian zones.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5

State Rank: S2S3

#### **Muskrat**

*Ondatra zibethicus*

Found in fresh or brackish marshes, lakes, ponds, swamps, and other bodies of slow-moving water. Most abundant in areas with cattail. Dens in bank burrow or conical house of vegetation in shallow vegetated water. It is primarily found in the Rio Grande near El Paso and in SE Texas in the Houston area.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5

State Rank: S5

#### **southeastern myotis bat**

*Myotis austroriparius*

Caves are rare in Texas portion of range; buildings, hollow trees are probably important. Historically, lowland pine and hardwood forests with large hollow trees; associated with ecological communities near water. Roosts in cavity trees of bottomland hardwoods, concrete culverts, and abandoned man-made structures.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G4

State Rank: S3

#### **swamp rabbit**

*Sylvilagus aquaticus*

Primarily found in lowland areas near water including: cypress bogs and marshes, floodplains, creeks and rivers.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5

State Rank: S5

#### **tricolored bat**

*Perimyotis subflavus*

Forest, woodland and riparian areas are important. Caves are very important to this species.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G2G3

State Rank: S3S4

#### **western hog-nosed skunk**

*Conepatus leuconotus*

Habitats include woodlands, grasslands & deserts, to 7200 feet, most common in rugged, rocky canyon country; little is known about the habitat of the ssp. *telmalestes*

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G4

State Rank: S4

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## DALLAS COUNTY

### MOLLUSKS

#### Louisiana Pigtoe

*Pleurobema riddellii*

Occurs in small streams to large rivers in slow to moderate currents in substrates of clay, mud, sand, and gravel. Not known from impoundments (Howells 2010f; Randklev et al. 2013b; Troia et al. 2015). [Mussels of Texas 2019]

Federal Status:

State Status: T

SGCN: Y

Endemic: N

Global Rank: G1G2

State Rank: S1

#### Sandbank Pocketbook

*Lampsilis satura*

Occurs in small streams to large rivers in slow to moderate current in sandy mud to sand and gravel substrate. Can occur in a variety of habitats but most common in littoral habitats such as banks or backwaters or in protected areas along point bars (Randklev et al. 2013b; Randklev et al. 2014a; Troia et al. 2015). [Mussels of Texas 2019]

Federal Status:

State Status: T

SGCN: Y

Endemic:

Global Rank: G2?

State Rank: S1

#### Texas Heelsplitter

*Potamilus amphichaenus*

Occurs in small streams to large rivers in standing to slow-flowing water; most common in banks, backwaters and quiet pools; adapts to some reservoirs. Often found in soft substrates such as mud, silt or sand (Howells et al. 1996; Randklev et al. 2017a). [Mussels of Texas 2019]

Federal Status:

State Status: T

SGCN: Y

Endemic: N

Global Rank: G1G3

State Rank: S1

#### Trinity Pigtoe

*Fusconaia chunii*

Found in a variety of habitats but most common in riffles. Inhabits various substrates though most often sand, gravel, and cobble (species was recently split from Texas Pigtoe and occurs in similar habitats; Howells 2010a; Randklev et al. 2013b; Randklev et al. 2014a; Troia et al. 2015). [Mussels of Texas 2020]

Federal Status:

State Status: T

SGCN: Y

Endemic: Y

Global Rank: GNR

State Rank: S1

### REPTILES

#### alligator snapping turtle

*Macrochelys temminckii*

Aquatic: Perennial water bodies; rivers, canals, lakes, and oxbows; also swamps, bayous, and ponds near running water; sometimes enters brackish coastal waters. Females emerge to lay eggs close to the waters edge.

Federal Status:

State Status: T

SGCN: Y

Endemic: N

Global Rank: G3

State Rank: S2

#### common garter snake

*Thamnophis sirtalis*

Terrestrial and aquatic: Habitats used include the grasslands and modified open areas in the vicinity of aquatic features, such as ponds, streams or marshes. Damp soils and debris for cover are thought to be critical.

Federal Status:

State Status:

SGCN: N

Endemic:

Global Rank: G5

State Rank: S2

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## DALLAS COUNTY

### REPTILES

**eastern box turtle** *Terrapene carolina*

Terrestrial: Eastern box turtles inhabit forests, fields, forest-brush, and forest-field ecotones. In some areas they move seasonally from fields in spring to forest in summer. They commonly enters pools of shallow water in summer. For shelter, they burrow into loose soil, debris, mud, old stump holes, or under leaf litter. They can successfully hibernate in sites that may experience subfreezing temperatures.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3

**Pigmy Rattlesnake** *Sistrurus miliarius*

The pygmy rattlesnake occurs in a variety of wooded habitats from bottomland coastal hardwood forests to upland savannas. The species is frequently found in association with standing water.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S2S3

**Prairie Skink** *Plestiodon septentrionalis*

The prairie skink can occur in any native grassland habitat across the Rolling Plains, Blackland Prairie, Post Oak Savanna and Pineywoods ecoregions.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S5

**slender glass lizard** *Ophisaurus attenuatus*

Terrestrial: Habitats include open grassland, prairie, woodland edge, open woodland, oak savannas, longleaf pine flatwoods, scrubby areas, fallow fields, and areas near streams and ponds, often in habitats with sandy soil.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3

**Texas garter snake** *Thamnophis sirtalis annectens*

Terrestrial and aquatic: Habitats used include the grasslands and modified open areas in the vicinity of aquatic features, such as ponds, streams or marshes. Damp soils and debris for cover are thought to be critical.

Federal Status:	State Status:	SGCN: Y
Endemic: Y	Global Rank: G5T4	State Rank: S1

**Texas horned lizard** *Phrynosoma cornutum*

Terrestrial: Open habitats with sparse vegetation, including grass, prairie, cactus, scattered brush or scrubby trees; soil may vary in texture from sandy to rocky; burrows into soil, enters rodent burrows, or hides under rock when inactive. Occurs to 6000 feet, but largely limited below the pinyon-juniper zone on mountains in the Big Bend area.

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G4G5	State Rank: S3

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## DALLAS COUNTY

### REPTILES

**timber (canebrake) rattlesnake**      *Crotalus horridus*

Terrestrial: Swamps, floodplains, upland pine and deciduous woodland, riparian zones, abandoned farmland. Limestone bluffs, sandy soil or black clay. Prefers dense ground cover, i.e. grapevines, palmetto.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: S4

**western box turtle**      *Terrapene ornata*

Terrestrial: Ornate or western box turtles inhabit prairie grassland, pasture, fields, sandhills, and open woodland. They are essentially terrestrial but sometimes enter slow, shallow streams and creek pools. For shelter, they burrow into soil (e.g., under plants such as yucca) (Converse et al. 2002) or enter burrows made by other species.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3

**western chicken turtle**      *Deirochelys reticularia miaria*

Aquatic and terrestrial: This species uses aquatic habitats in the late winter, spring and early summer and then terrestrial habitats the remainder of the year. Preferred aquatic habitats seem to be highly vegetated shallow wetlands with gentle slopes. Specific terrestrial habitats are not well known.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5T5	State Rank: S2S3

**western massasauga**      *Sistrurus tergeminus*

Terrestrial: Shortgrass or mixed grass prairie, with gravel or sandy soils. Often found associated with draws, floodplains, and more mesic habitats within the arid landscape. Frequently occurs in shrub encroached grasslands.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3G4	State Rank: S3S4

### PLANTS

**Engelmann's bladderpod**      *Physaria engelmannii*

Grasslands and calcareous rock outcrops in a band along the eastern edge of the Edwards Plateau, ranging as far north as the Red River (Carr 2015).

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: S3

**glandular gay-feather**      *Liatris glandulosa*

Occurs in herbaceous vegetation on limestone outcrops (Carr 2015)

Federal Status:	State Status:	SGCN: Y
Endemic: Y	Global Rank: G3	State Rank: S2

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## DALLAS COUNTY

### PLANTS

**Glass Mountains coral-root**      *Hexalectris nitida*

Apparently rare in mixed woodlands in canyons in the mountains of the Brewster County, but encountered with regularity, albeit in small numbers, under *Juniperus ashei* in woodlands over limestone on the Edwards Plateau, Callahan Divide and Lampasas Cutplain; Perennial; Flowering June-Sept; Fruiting July-Sept

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: S3

**Glen Rose yucca**      *Yucca necopina*

Grasslands on sandy soils and limestone outcrops; flowering April-June

Federal Status:	State Status:	SGCN: Y
Endemic: Y	Global Rank: G1G2	State Rank: S3

**Hall's prairie clover**      *Dalea hallii*

In grasslands on eroded limestone or chalk and in oak scrub on rocky hillsides; Perennial; Flowering May-Sept; Fruiting June-Sept

Federal Status:	State Status:	SGCN: Y
Endemic: Y	Global Rank: G3	State Rank: S2

**Oklahoma phlox**      *Phlox oklahomensis*

Known from a 1958 collection from an oak woodland four miles east of Garland, Texas (Carr 2015).

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: SH

**Osage Plains false foxglove**      *Agalinis densiflora*

Most records are from grasslands on shallow, gravelly, well drained, calcareous soils; Prairies, dry limestone soils; Annual; Flowering Aug-Oct

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: S2

**plateau milkvine**      *Matelea edwardsensis*

Occurs in various types of juniper-oak and oak-juniper woodlands; Perennial; Flowering March-Oct; Fruiting May-June

Federal Status:	State Status:	SGCN: Y
Endemic: Y	Global Rank: G3	State Rank: S3

**Sutherland hawthorn**      *Crataegus viridis* var. *glabriuscula*

In mesic soils of woods or on edge of woods, treeline/fenceline, or thicket. Above/near creeks and draws, in river bottoms. Flowering Mar-Apr; fruiting May-Oct.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5T3T4	State Rank: S3

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## DALLAS COUNTY

### PLANTS

#### **Texas milk vetch**

*Astragalus reflexus*

Grasslands, prairies, and roadsides on calcareous and clay substrates; Annual; Flowering Feb-June; Fruiting April-June

Federal Status:

State Status:

SGCN: Y

Endemic: Y

Global Rank: G3

State Rank: S3

#### **tree dodder**

*Cuscuta exaltata*

Parasitic on various *Quercus*, *Juglans*, *Rhus*, *Vitis*, *Ulmus*, and *Diospyros* species as well as *Acacia berlandieri* and other woody plants; Annual; Flowering May-Oct; Fruiting July-Oct

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G3

State Rank: S3

#### **Warnock's coral-root**

*Hexalectris warnockii*

In leaf litter and humus in oak-juniper woodlands on shaded slopes and intermittent, rocky creekbeds in canyons; in the Trans Pecos in oak-pinyon-juniper woodlands in higher mesic canyons (to 2000 m [6550 ft]), primarily on igneous substrates; in Terrell County under *Quercus fusiformis* mottes on terraces of spring-fed perennial streams, draining an otherwise rather xeric limestone landscape; on the Callahan Divide (Taylor County), the White Rock Escarpment (Dallas County), and the Edwards Plateau in oak-juniper woodlands on limestone slopes; in Gillespie County on igneous substrates of the Llano Uplift; flowering June-September; individual plants do not usually bloom in successive years

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G2G3

State Rank: S2

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## **APPENDIX F – PUBLIC NOTICES AND COMMENTS**





**U.S. DEPARTMENT OF VETERANS AFFAIRS  
OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT**

**NOTICE OF SCOPING AND PUBLIC INVOLVEMENT  
UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT  
FOR THE PROPOSED  
LONG-TERM SPINAL CORD INJURY AND  
CLINICAL EXPANSION FOR MENTAL HEALTH PROJECTS  
DALLAS VA MEDICAL CENTER  
DALLAS, TEXAS**

The U.S. Department of Veterans Affairs (VA) Office of Construction and Facilities Management is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the Federal decision-making process for the proposed Long-Term Spinal Cord Injury (LTSCI) and Clinical Expansion for Mental Health (CEMH) projects at the VA North Texas Health Care System – Dallas Campus (Dallas VAMC) located at 4500 South Lancaster Road, Dallas, Texas. The proposed LTSCI and CEMH buildings include an approximately 172,000-square-foot LTSCI facility, an approximately 215,000-square-foot CEMH facility, an approximately 80,000-square-foot warehouse/office, and an approximately 1,000-car parking garage. Approximately 14 small to medium-sized, older buildings would be demolished to create space on the campus for the new, larger LTSCI and CEMH buildings.

In accordance with the National Environmental Policy Act (NEPA), VA is seeking the public's input on issues to be addressed during the NEPA process, including environmental concerns that may occur as a result of the proposed Federal action.

A public scoping period is open through **August 3, 2021**. During this time, the public is invited to submit comments on the proposed action and identify potential issues or concerns for consideration in the NEPA process. Due to the on-going COVID 19 pandemic all submissions should be sent/made via email to [vacoenvironment@va.gov](mailto:vacoenvironment@va.gov) with the subject line "Dallas VAMC LTSCI and CEMH NEPA Scoping."

If including your address, phone number, e-mail address, or other personally identifiable information in your comment, please be aware that your entire comment – including your personal identifiable information – may be made publicly available at any time. While you can ask us in your comment to withhold your personally identifiable information from public review, we cannot guarantee that we will be able to do so.