
**FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED VA JACKSONVILLE OUTPATIENT CLINIC AND DOMICILIARY
DUVAL COUNTY, FLORIDA**

Introduction

A Final Environmental Assessment (EA), included herein by reference, was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) Proposed Action to establish an approximately 158,600-square-foot outpatient clinic (OPC) and an approximately 26,900-square-foot domiciliary in the Jacksonville, Florida, area (Duval County). The EA was prepared in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26).

The purpose of the Proposed Action is to provide enhanced and expanded outpatient health care and inpatient mental health services to Veterans in the Jacksonville, Florida, area in integrated, right-sized, energy-efficient facilities. The proposed OPC would provide a centralized, appropriately sized facility for VA to consolidate, enhance, and expand primary care, mental health, and specialty care services to area Veterans. The proposed domiciliary would provide an appropriately sized facility to expand inpatient mental health services to area Veterans. The Proposed Action would allow VA to provide timely access to state-of-the-art, health care and mental health services in modern, properly sized facilities to meet current and projected workloads.

The Proposed Action is needed to address current and future projected health care capacity and space gaps and operational inefficiencies that were identified through the VA Strategic Capital Investment Planning process. The existing leased Jacksonville VA SouthPoint Clinic and Jacksonville VA University Clinic are undersized (total 50,000 square feet) and insufficient to meet the current and rapidly growing outpatient health care needs of area Veterans. In addition, operating separate outpatient clinics in the area creates operational inefficiencies, integrates services poorly, and increases costs. The domiciliary is needed to address inpatient mental health space gaps and the shortage of Veteran residential care in the Jacksonville area.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action is to establish an approximately 158,600-square-foot, two-story OPC and an approximately 26,900-square-foot, one-story domiciliary, with approximately 1,150 surface parking spaces on one contiguous piece of land in the Jacksonville, Duval County, Florida, area. Two undersized leased clinics would be replaced by the new facility, and the downtown Jacksonville OPC would continue to provide Veterans' health care services.

Alternatives Considered

VA examined the existing facilities for their potential to support the Proposed Action. The leased SouthPoint OPC and University OPC cannot be expanded beyond their current sizes. In addition, continued operation of two separate facilities would not enable VA to provide centralized, consolidated health care services. VA determined that the existing facilities could not be expanded, modified, or renovated to meet the purpose of and need for the Proposed Action.

VA advertised through a Request for Lease Proposals for the development and lease of facilities for implementing the Proposed Action within a delineated area (Duval County). VA received offers within the competitive range for development at two sites (Sites 1 and 2).

The EA examined in depth implementation of the Proposed Action at Site 1 and Site 2, as well as the No Action Alternative.

Site 1 (Max Leggett Parkway): Site 1 is located near the northwest corner of the intersection of Max Leggett Parkway (formerly Duval Road) and Hyatt Road within the City of Jacksonville. Site 1 is approximately 21 acres of mostly undeveloped land with overgrown grassy and scrub vegetation, wooded areas containing mostly pine trees, dirt roads, and a vacant office trailer. Site 1 contained grassy land and/or agricultural fields and wooded land with a residence and other structures from the 1940s through the 2006, was mostly cleared in 2007, was planted with pine trees by 2011, and was partially cleared and graded in 2017. Primary and secondary access to the OPC and domiciliary would be from Max Leggett Parkway.

Site 2 (Lone Star Road): Site 2 is located northwest of the intersection of Lone Star Road/Tredinick Parkway and the southbound Southside Connector (State Route 113) Service Drive within the City of Jacksonville. Site 2 is approximately 20.6 acres of vacant and cleared land. Site 2 was undeveloped woodlands in 1943, was part of a large titanium strip mine from approximately 1950 to the early 1970s, and was the site of land disposal of sanitary and industrial wastewater residuals from the early 1970s until 1985. Mixed use development of the surrounding properties began in the early 2000s, during which Site 2 was regraded; however, Site 2 has remained undeveloped. The preliminary site plan includes access to the OPC and domiciliary from the southbound Southside Connector Service Drive and Lone Star Road/Tredinick Parkway.

The developer would build and own the OPC and domiciliary, and would be responsible to design and construct the facilities in compliance with VA design requirements and applicable federal, state, and local regulations. The facilities would be leased and operated by VA. VA anticipates construction of the proposed OPC and domiciliary would begin in 2021 and that the facilities would be open in 2024.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. VA would continue to provide primary care, mental health, and specialty care outpatient services at the two small VA-leased facilities in the area through lease extensions for an undetermined period of time. The Action Alternative sites likely would remain vacant in the near future and ultimately may be developed by others for other commercial use or residential use, in accordance with local zoning. This alternative would limit VA's ability to provide health care services to U.S. Veterans in the region, and thus would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was evaluated in the EA as required under the CEQ regulations and provides a benchmark analysis for comparing the effects of the Proposed Action.

2. Environmental Analysis

Environmental Consequences

Action Alternatives

The Final EA concluded that the Action Alternatives would result in short-term and/or long-term potential adverse impacts to aesthetics, air quality, soils, hydrology and water quality, wildlife and habitat (Site 1), noise, wetlands (Site 1), solid waste and hazardous materials, and transportation. All of these potential impacts are less than significant and would be further reduced through careful coordination and implementation of the general best management practices (BMPs); management, mitigation, and minimization measures; and compliance with regulatory requirements, as identified in the Final EA.

At Site 2, environmental investigations conducted in 2006 found the sanitary and industrial wastewater treatment residuals/sludges that were placed on the site and the surrounding properties from the early 1970s until 1985 contaminated the soil at these properties. In 2006, contaminated soil was removed from surrounding properties that were planned for residential development and placed on properties planned for commercial development, including Site 2. Soil sampling conducted at Site 2 in 2020 identified polynuclear aromatic hydrocarbon concentrations exceeding the Florida Residential and Commercial Direct Exposure Soil Cleanup Target Levels (SCTLs) and copper-impacted soil exceeding the Residential Direct Exposure SCTL. The impacted soil at Site 2 would require remediation to prevent potential unacceptable exposures to the contaminants by future occupants of the proposed OPC and domiciliary. The developer has preliminarily planned the excavation and removal from the site of the soil that exceeds the Residential Direct Exposure SCTLs, and has drafted a plan to ensure integrity of existing engineering controls for contamination that would remain in place. The developer would prepare and submit for approval by the Florida Department of Environmental Protection (FDEP) a Remedial Action Plan that would prevent potential unacceptable exposures for future occupants of the proposed OPC and domiciliary. A Soil and Water Management Plan would inform construction contractors of the site conditions and ensure proper handling and disposal of excavated soils. With the effective and documented successful completion of these actions (state approval of the site as suitable for residential use, soil remediation, engineering control maintenance, and implementation of a Soil and Water Management Plan), potential impacts associated with contamination identified at Site 2 would be less than significant.

The Action Alternatives would result in beneficial short-term and long-term impacts to the local socioeconomic environment. Notably, a significant long-term beneficial effect supporting the health of U.S. Veterans in the region would occur should the new OPC and domiciliary be constructed under the Proposed Action.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented and no improvements to the current level of VA's regional health care services or capability would occur. No beneficial impacts attributable to the Proposed Action would occur and VA's ability to provide sufficient, requisite health care services to the region's Veterans would be compromised.

Cumulative Impacts

The EA also examined the potential cumulative effects of implementing each of the considered alternatives. The analysis found that the Action Alternatives, with the implementation of the BMPs; management, mitigation, and minimization measures; and regulatory compliance measures specified in this EA, would not result in significant adverse cumulative impacts to the human environment.

Management, Minimization, and Mitigation Measures

The BMPs, management and minimization measures, project-specific mitigation, and regulatory compliance measures summarized in Table 8 of the Final EA (attached herein as Appendix A) will be included by VA's developer in the selected Action Alternative to minimize and maintain adverse effects at less-than-significant levels.

3. Regulations

Implementing the Proposed Action at either alternative site will be consistent with federal, state, and local environmental regulations, including those listed in Section 6.0 of the Final EA.

4. Commitment to Implementation

VA affirms its commitment to implement the BMPs; management, mitigation, and minimization measures; and regulatory compliance measures identified in the Final EA and this finding of no significant impact (FONSI). VA will ensure that the measures identified in Appendix A are requirements in any contract awarding a long-term lease for the Proposed Action.

5. Agency and Public Involvement

VA has consulted with appropriate federal, state, and local regulatory agencies, and federally recognized Native American Tribes identified as having possible ancestral ties to the Duval County, Florida, area. This consultation is documented in the Final EA. Comments and input submitted by regulatory agencies and Tribes have been addressed in the Final EA.

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability published in the Florida Times-Union, a local newspaper of general circulation, on July 8 and 12, 2020. A copy of the Draft EA was also made available on the North Florida Health Care System website.

VA emailed notification of the availability of the Draft EA for review and comment, with a link to the Draft EA on the North Florida Health Care System website, to each of the agencies and Tribes that were contacted during the NEPA scoping and Section 106 consultation. Four agencies (Florida Department of Transportation, FDEP Florida Geological Survey, FDEP Division of Waste Management, and U.S. Environmental Protection Agency) provided comments regarding the Draft EA. The agency comments on the Draft EA were considered in preparing the Final EA, as appropriate.

VA held a virtual public meeting on July 23, 2020, at 6 pm to present a summary of the Draft EA and to receive public input and comment on the Draft EA. One member of the public attended the public meeting. One comment was received regarding the timing of the lease award. No comments regarding the Proposed Action or the Draft EA were provided.

6. Finding of No Significant Impact

After careful review of the Final EA, VA has concluded that implementing either alternative would not generate significant controversy or have a significant impact on the quality of the human environment, provided the selected developer implements the BMPs; management, mitigation, and minimization measures; and regulatory compliance measures identified in Appendix A to this FONSI

This analysis fulfills the requirements of NEPA and is consistent with the VA and CEQ regulations implementing the Act. An environmental impact statement is not required.

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**Management, Mitigation, and Minimization Measures
 Incorporated into the Proposed Action**

Technical Resource Area	Measure
Aesthetics	Comply with the development standards of the Jacksonville Code of Ordinances.
	Use vegetative buffers to enhance viewsapes, particularly near adjacent residential properties.
	Use shielded, downward-facing outdoor lighting.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust, palliative, covers, suspension of earth moving in high wind conditions) during onsite construction activities.
	Stabilize disturbed area through re-vegetation or mulching if the area would be inactive for several weeks or longer.
	Implement measures to reduce diesel particulate matter emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Comply with the applicable Florida Department of Environmental Protection (FDEP) Division of Air and City of Jacksonville air quality regulations. Secure any required minor air emissions permits from FDEP, and the Jacksonville Regulatory Compliance Department of Environmental Quality, Air Quality Branch prior to construction.
Cultural Resources	Should potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work in the area until VA, a qualified archaeologist, Florida State Historic Preservation Office, the Muscogee (Creek) Nation, and other consulting parties are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s).

Technical Resource Area	Measure
<p>Geology and Soils</p>	<p>Properly compact fill soil imported to the site (Site 1).</p>
	<p>Complete a geotechnical investigation of the selected site. Identify and implement design recommendations to prevent unacceptable settling/subsidence.</p>
	<p>Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the St. John’s River Water Management District (SJRWMD) Environmental Resource Program (ERP) and the FDEP National Pollutant Discharge Elimination System (NPDES) permitting processes. Implement effective controls through a site-specific Stormwater Pollution Prevention Plan (SWPPP). The ERP and NPDES permits would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the ERP and NPDES permits and the SWPPP to protect surface water quality.</p>
<p>Hydrology and Water Quality</p>	<p>Control soil erosion and sedimentation impacts during construction by complying with the SJRWMD ERP and FDEP NPDES permit.</p>
	<p>Obtain approval from FDEP and SJRWMD for any alteration of existing stormwater features or the construction of new stormwater features per requirements of the restrictive covenant (Site 2).</p>
	<p>Design improvements in accordance with the requirements of Energy Independence Security Act Section 438 with respect to stormwater runoff quantity and characteristics.</p>
	<p>Ensure the design of the OPC and domiciliary includes sufficient stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas.</p>

Technical Resource Area	Measure
<p>Wildlife and Habitat</p>	<p>Conduct a preconstruction survey within 90 days of construction to determine the potential presence of gopher tortoises or eastern indigo snakes. If either species is identified, contact the Florida Fish and Wildlife Conservation Commission to obtain the necessary permit and approval for their relocation (Site 1).</p>
	<p>Avoid vegetation clearing construction during the common ground dove nesting season (February to December), if possible; that is, clear vegetation only during January. If not possible, have a qualified biologist survey the site for active nests prior to clearing. If active common ground dove nests are identified, avoid disturbance of the nests until eggs have incubated (12-14 days) and the young birds have fledged (another 11-12 days or more) (Site 1).</p>
	<p>Native species should be used to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species.</p>
<p>Noise</p>	<p>Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 7:00 p.m. on Monday through Friday, or during normal, weekday, work hours.</p>
	<p>Locate stationary operating equipment as far away from sensitive receptors as possible.</p>
	<p>Comply with the noise control provisions of the Jacksonville Code of Ordinances.</p>
	<p>Coordinate proposed construction activities in advance with nearby sensitive receptors (residences adjacent and within 700 feet of each site). Let these local residents know what operations would be occurring at what times, including when they would start and when they would finish each day. Post signage at the entry points of the selected site providing current construction information, including schedule and activity.</p>
	<p>Shut down noise-generating heavy equipment when it is not needed.</p>
	<p>Maintain equipment per manufacturer’s recommendations to minimize noise generation.</p>
	<p>Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, engine speed restrictions).</p>

Technical Resource Area	Measure
Land Use	Comply with the applicable zoning regulations and development standards for the selected site.
Wetlands, Floodplains, and Coastal Zone Management	Complete the required mitigation for filling on-site wetlands in accordance with the U.S. Army Corps of Engineers and SJRWMD permit requirements (Site 1).
	Include design measures to prevent impacts to the adjacent wetland off-site wetland conservation/preservation areas in the stormwater plan for the ERP permit (Site 1).
	Design improvements in accordance with the requirements of Energy Independence Security Act Section 438 with respect to stormwater runoff quantity so as not to adversely affect the flood elevations or water quantity/quality in downstream receiving waters.
	Obtain necessary environmental permits and coordinate with the FDEP, as required, to ensure that the Proposed Action is consistent with the FDEP's Coastal Zone Management Program.
Socioeconomics	Construction areas would be secured to prevent unauthorized access by children from the nearby residential areas.
Community Services	None required.

Technical Resource Area	Measure
Solid Waste and Hazardous Materials	Comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid and hazardous materials and medical wastes.
	Comply with the terms of the restrictive covenant placed on the site to address vanadium impacts from the use of EZBase at the site. The restrictive covenant prohibits the use of groundwater, requires a plan approved by FDEP for any dewatering, requires approval from FDEP and SJRWMD for any alteration of the existing stormwater features or the construction of new stormwater features, and requires the right-of-way (ROW) area with remaining EZBase to be permanently covered with impermeable material (Site 2).
	Prepare, have approved by FDEP, and implement a plan for the proper handling and disposal of soils beneath the pavement covering the remaining EZBase within the Tredinick Parkway/Lone Star Road ROW that would be disturbed during site development. Restore the pavement engineering barrier, as necessary (Site 2).
	Develop and implement a Soil and Groundwater Management Plan to inform construction contractors of site contamination and to ensure the proper handling and disposal of impacted groundwater and soil that may be encountered during construction (Site 2).
	Remediate soils at the site that exceed the Florida Residential Direct Exposure Soil Cleanup Target Levels (SCTLs) for polynuclear aromatic hydrocarbons (PAHs) and copper, and obtain FDEP concurrence with the site's suitability for residential use (Site 2).
	Transportation and Parking
Utilities	Submit detailed design plans to each utility provider to determine the specific connection/extension requirements and implement the necessary requirements.
Environmental Justice	None required.