FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED LTSCI AND CEMH PROJECTS
VA NORTH TEXAS HEALTH CARE SYSTEM
DALLAS VA MEDICAL CENTER
4500 SOUTH LANCASTER ROAD
DALLAS, TEXAS

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 new Long-Term Spinal Cord Injury (LTSCI) and Clinical Expansion for Mental Health (CEMH) projects at the VA North Texas Health Care System (VANTHCS) – Dallas Campus (Dallas VA Medical Center or Dallas VAMC) located at 4500 South Lancaster Road in Dallas, Dallas County, Texas. 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 larger, state-of-the-art facilities and supporting infrastructure to further expand and enhance Veteran health care services, specifically long-term spinal cord injury and mental health care services, at the Dallas VAMC campus.

The proposed LTSCI facility would be equipped with approximately 30 to 60 beds and would be operationally integrated with the existing 30-bed acute spinal cord injury (SCI) center in Building 74 and would provide specialized long-term residential care for Veterans with spinal cord injuries that is not currently available in the region. The proposed CEMH facility would enable VA to consolidate existing mental health care programs, including outpatient services, acute inpatient beds, and residential rehabilitation beds into a single, appropriately-sized, modern facility specially designed for mental health care that meets VA mental health program and safety guidelines. The proposed LTSCI and CEMH projects also include the construction of a new warehouse/office building to consolidate and house services provided by several small buildings and trailers that would be demolished for the CEMH development, a new parking garage to replace surface parking lost as a result of the LTSCI and CEMH projects, and relocating Liberty Loop Road to accommodate the LTSCI and CEMH development, meet federal physical security requirements, and to improve traffic flow at the campus.

The Proposed Action is needed to address the antiquated and undersized facilities and operational deficiencies at the Dallas VAMC to support the rapidly growing Veteran demand for health care services in the region.

There are currently no dedicated long-term care specialty facilities for Veterans with spinal cord injuries and disorders at the Dallas VAMC or other VA facilities in the region. Veterans with spinal cord injuries that require long-term care reside in VA Community Living Centers (CLCs), VA SCI Acute Care hospital wards, and community nursing homes. Community nursing homes and CLCs do not have the necessary staff, training, or specialized equipment to meet the unique medical and psychosocial needs of these patients and SCI Acute Care hospital wards are unacceptable locations for long-term residential care. In 2013, approximately 80 Texas-area Veterans with

spinal cord injuries required long-term care. VA projects this number will grow to approximately 100 by 2025.

Building 1, the original VA hospital building constructed in the late 1930s, houses the primary mental health facilities at the Dallas VAMC. Building 1 does not conform to VA function, safety, and privacy standards of care that are critical to the provision of mental health services. In addition, Dallas VAMC mental health care services have outgrown the allotted space and, as a result, mental health clinics and programs are scattered throughout the campus with some programs being required to be located off campus. This dispersion of mental health services/programs impedes access to mental health care and does not conform to VA guidelines regarding delivery of patient-centered care. VA projects Veteran demand for mental health services in the Dallas area will continue to grow. Mental health outpatient visits are estimated to increase 67 percent between 2011 and 2031.

1. Description of the Proposed Action and Alternatives

Proposed Action

The Proposed Action is to construct and operate new LTSCI and CEMH facilities and supporting infrastructure, including on-campus parking, to expand and enhance health care services at the Dallas VAMC campus. 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 building, and an approximately 1,000-car parking garage. The LTSCI and CEMH projects include the demolition of 15 small to medium-sized, older campus buildings and temporary trailers. These facilities are primarily used for administrative and support services and/or are underutilized and their removal creates space on the space-constrained Dallas VAMC campus for the new LTSCI and CEMH buildings. The proposed LTSCI and CEMH projects would provide larger, state-of-the-art facilities and infrastructure at the Dallas VAMC campus to meet the rapidly growing Veteran needs for health care services in the region.

The LTSCI and CEMH projects would be conducted in phases over a period of approximately 6 to 8 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. Project design details are not available at this time.

Alternatives Considered

After identifying the need for a LTSCI facility and the inadequacies of the existing mental health facilities at the Dallas VAMC campus, VA examined other potential buildings and spaces within the campus for establishing a new LTSCI and consolidated, expanded mental health facilities. No suitable space was identified in the existing over-crowded and functionally-deficient campus buildings. VA also considered leasing new facilities, acquiring existing off-campus facilities, or contracting out LTSCI and mental health services, but found that none these options were viable. Consequently, VA determined that construction of new LTSCI and centralized CEMH facilities at the Dallas VAMC campus was the only viable and reasonable alternative to fully meet the purpose and need for the Proposed Action.

VA examined various locations at the campus for construction of the new LTSCI and CEMH buildings. Based on the advantages of providing integrated LTSCI care with existing SCI care, VA selected the area adjacent to the east of Building 74 (SCI) for the new LTSCI building. No centralized, unused space was available for the construction of the new CEMH facility. However, VA identified underutilized portions of the Dallas VAMC campus that were available to be repurposed to expand and enhance health care services at the campus. These underutilized portions of the campus include small, antiquated buildings that are either unused and/or have limited use potential based on the size, location, and/or configuration, temporary trailer buildings,

and areas with generally inefficient use of space, such as small surface-level parking lots. VA concluded that these buildings and areas were suited for removal and replacement with modern, state-of-the-art facilities that better utilize campus space and increase the efficiency of campus operations. The area north and northeast of Building 1 was selected for the new CEMH building.

The EA examined in-depth two alternatives, the Proposed Action and the No Action Alternative.

Proposed Action

The Proposed Action would include the construction of 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.

The primary components of the LTSCI project include:

- Construction and operation a new approximately 172,000-square-foot, three to four-story LTSCI facility in the southeastern portion of the campus, adjacent to 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 in the northeastern portion of the campus and the construction and operation of a new approximately 80,000-square-foot, two-story warehouse/office in this area.
- Reconfiguration/relocation of Liberty Loop to the south and east of the new LTSCI building and LTSCI parking garage.

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

- Demolition of Buildings 44, 45, TT46, TT47, TT48, TT51, TT54, and Structure 58 in the north-central portion of the campus and the construction and operation of a new approximately 215,000-square-foot, three to four-story, approximately 80-bed, CEMH facility in this area. The CEMH would consolidate and expand mental health services provided at the campus. It is anticipated the CEMH would consist of two adjacent, connected structures, one containing a mental health clinic and one containing residences for mental health patients.
- Demolition of Buildings 5, 6, 8, 9 and TT49 in the northern portion of the campus and reconfiguration/relocation of Liberty Loop and the construction of surface parking lots for the CEMH in this area. 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 associated with the CEMH facility in the northwestern portion of the campus, in the northern portion of a current Dallas VAMC parking lot.

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

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented; the proposed LTSCI and CEMH facilities would not be constructed at the Dallas VAMC campus. Veterans with spinal cord injuries in need of long-term care would continue to reside in VA CLCs and community nursing homes that do not have the necessary specially-trained staff and equipment or VA SCI Acute Care hospital wards that are not suitable for long-term residential needs. VA would continue to provide mental health services in antiquated Building 1, which does not conform to VA function, safety and privacy standards, and other scattered buildings at the campus and off-campus.

2. Environmental Analysis

Environmental Consequences

Proposed Action Alternatives

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

Through National Historic Preservation Act (NHPA) Section 106 compliance investigations and consultation, VA identified one building at the Dallas VAMC campus (Building 1, with Building 3 as a component) as a historic property individually eligible for listing in the National Register of Historic Places (NRHP). No other buildings, structures, or archaeological sites at the Dallas VAMC campus are historic. No historic properties are anticipated to be affected by the LTSCI project; however, the CEMH design has not been completed and the full range of effects on historic properties cannot be determined at this time. Consequently, VA developed a Programmatic Agreement (PA), in consultation with the Texas Historical Commission (THC), which serves as the Texas State Historic Preservation Office (SHPO), for the Proposed Action. The PA includes project design review by THC to avoid, minimize, and/or mitigate adverse effects to historic properties; nomination of Building 1, with Building 3 as a component, for inclusion in the NRHP; documentation of Buildings 5, 6 and 10 prior to their demolition (formerly considered to be historic properties); and the installation of interpretative signage at the campus that memorializes the significance of the Dallas Veterans Administration Hospital. The PA was executed on June 2, 2022. With the implementation of the PA stipulations, cultural resources impacts would be less than significant.

A Hydrology Evaluation completed by Calibre Engineering in October 2021 (Second Revision) found that: the northern and central sections of the existing Dallas VAMC campus stormwater system contain one or more pipes that cannot fully accommodate 5-year and 10-year storms, with the west-central basin containing the greatest number of pipes that are overcapacity during 5-year and 10-year storm events. Much of the northern and central sections of the existing Dallas VAMC campus stormwater system cannot fully accommodate a 100-year storm. The evaluation found that most of the southwestern section of the existing campus stormwater system can accommodate 5-year, 10-year, and 100-year storms. The City of Dallas Drainage Manual and VA design criteria require stormwater piping to accommodate a 100-year storm event. The Dallas VAMC has requested and secured funding for required upgrades to the Dallas VAMC stormwater collection and conveyance system as a separate project from the Proposed Action, which would alleviate the current stormwater capacity issues at the campus. With the implementation of the upgrades, as needed, hydrological resource impacts would be less than significant.

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

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

Management, Minimization and Mitigation Measures

VA will include the BMPs; management, minimization and mitigation measures; and regulatory compliance measures summarized in Table 4-1 of the Final EA (attached herein as Appendix A) in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

3. Regulations

The Proposed Action will be consistent with federal, state, and local environmental regulations, including those listed in Appendix A of the Final EA.

4. Commitment to Implementation

VA affirms its commitment to implement the BMPs; management, minimization and mitigation measures; and regulatory compliance measures identified in the Final EA and this Finding of No Significant Impact (FONSI).

5. Agency and Public Involvement

VA has consulted with appropriate federal, state, and local regulatory agencies, and federally recognized Indian tribes identified as having possible ancestral ties to the Dallas VAMC 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 (NOA) published in the Dallas Morning News , a local newspaper of general circulation, on June 2 and 5, 2022. The Draft EA was made available for public review on the VA Office of Construction and Facilities Management Environmental Program website (https://www.cfm.va.gov/environmental/index.asp). In addition, a copy of the Draft EA was made available for public review at the Dallas Public Library. VA also emailed notification of the release of the Draft EA to the stakeholders previously contacted during the NEPA scoping and NHPA Section 106 consultation. The notice contained a link to the Draft EA on VA's website and invited the stakeholders to provide comments on the document. The Texas Council on Environmental Quality and U.S. Congresswoman Eddie Bernice Johnson provided comments on the Draft EA. These comments were considered in preparing the Final EA, as appropriate.

6. Finding of No Significant Impact

After careful review of the Final EA, VA has concluded that the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human environment, provided VA implements the BMPs; management, minimization and mitigation measures; and regulatory compliance measures identified in Appendix A to this FONSI. VA will implement these measures.

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

Bruce G MACK 3564500 Digitally signed by Bruce G MACK 3564500 Date: 2022.07.12 14:49:50 -05'00' 7/12/22

Mr. Bruce Mack, PG, REA, CHMM
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Table 4-1 Management, Minimization and Mitigation Measures Incorporated into the Proposed Action

Technical Resource Area	Measure
Aesthetics	Comply with the development standards of the Dallas City Code (DCC), to the extent practicable.
	Use shielded, downward-facing outdoor lighting.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust, palliative, covers, and 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 federal Clean Air Act as adopted in Texas Council on Environmental Quality (TCEQ) air quality regulations. Complete Permit By Rule (PBR) registration through TCEQ Form 10228.
Cultural and Historic Resources	Comply with the stipulations of the Programmatic Agreement (PA) to avoid, minimize, and/or mitigate adverse effects to historic properties.
	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, Texas State Historic Preservation Office (SHPO), and other consulting parties are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal laws.
Geology, Topography, and Soils	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the TCEQ-issued Texas Pollutant Discharge Elimination System (TPDES) permit required under the federal Clean Water Act, including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). The TPDES permit 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 TPDES permit and the SWPPP to protect surface water quality.
	Comply with DCC Stormwater Drainage Systems ordinance, as required to comply with the federal Clean Water Act.

Hydrology and Water Quality	Control soil erosion and sedimentation impacts during construction by complying with the TCEQ TPDES permit.
	Comply with DCC Stormwater Drainage Systems ordinance, as required to comply with the federal Clean Water Act.
	Receive prior authorization for stormwater discharges to the municipal stormwater system from the Dallas Stormwater Management Department.
	Ensure Dallas VAMC stormwater infrastructure is upgraded to accommodate a 100-year storm event (separate project).
	Design improvements in accordance with the requirements of Energy Independence and Security Act Section 438 with respect to stormwater runoff quantity and characteristics.
Wildlife and Habitat	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.
	Conduct vegetation clearing between September 16 and March 14 or conduct a survey for active bird nests prior to clearing.
	Use downward facing outdoor lighting.
Noise	Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 7:00 p.m., Monday through Friday, and between the hours of 8:00 a.m. and 7:00 p.m. on Saturdays and legal holidays.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Comply with the noise control provisions of the DCC, to the extent practicable.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer's recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, engine speed restrictions).
Land Use	Comply with the applicable DCC zoning regulations and development standards, to the extent practicable.
Wetlands, Floodplains, and Coastal Zone Management	None required.
Socioeconomics	Secure construction areas to prevent unauthorized access by children from nearby residential areas.

Community Services	None required.
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.
	Prepare a Soil Management Plan to notify construction contractors of the soil conditions in the proposed Warehouse/Office area and ensure proper handling and disposal of impacted soil that may be encountered during construction.
	Remove asbestos containing materials (ACMs) in accordance with the federal and state requirements prior to building renovation or demolition activities.
	Implement dust control measures, such as the use of water, during building demolition to control lead-based paint emissions.
	Register, install, and operate new emergency generator underground storage tanks (USTs) and aboveground storage tanks (ASTs) in accordance with TCEQ petroleum storage tank (PST) requirements, as applicable and to the extent practicable.
Transportation and Parking	Work with the City of Dallas Transportation Department during site design to identify and implement roadway and traffic signal improvements to reduce on-campus vehicle queueing.
	Ensure debris and/or soil is not deposited on local roadways during the demolition and construction activities.
Utilities	Submit design plans to each utility provider to determine the specific connection/extension requirements and implement the necessary requirements.
	Obtain a modified wastewater discharge permit from the Dallas Water Utility Pretreatment Program, if required.
Environmental Justice	None required.