Proposed El Paso Health Care Center
Finding of No Significant Impact

July 2022

Prepared for:

U.S. Department of Veterans Affairs
Office of Construction and Facilities Management

and

U.S. Army Garrison, Fort Bliss

Prepared by:
LRS Federal LLC

1.0 Introduction

A Final Environmental Assessment (EA), included by reference, was prepared to identify, analyze, and document the physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) proposed action to construct and operate an approximately 500,000-square-foot health care center (HCC) with 1,500 - 2,000 parking spaces on Fort Bliss in Texas. The HCC would employ approximately 987 staff. The site would include other site improvements, amenities, and landscaped areas. The HCC would be designed and built to VA design criteria.

The purpose of the proposed action is to enhance and expand services for Veterans in the El Paso, Texas area. The proposed HCC would be designed to focus on specialty care, to expand ambulatory surgery functions, and to provide virtual health care to Veterans. The proposed action is needed to address future projected health care needs, expand capacity, reduce service gaps, and enhance VA health care services. The center would augment the services provided at existing VA facilities, health care centers, and clinics and position the VA to meet the growing health care needs of Veterans in the El Paso area. VA will provide timely access to state-of-the-art health care, enhance specialty care services, and provide ambulatory surgery functions to Veterans in the El Paso area.

2.0 Alternatives

Under the no action alternative, the proposed action would not be implemented. VA would continue to provide services at existing, under-sized VA facilities, health care centers, and clinics. The proposed site would not be used by VA and could possibly be used by Fort Bliss for other purposes. This alternative would limit VA's ability to provide needed health care services to Veterans in the region. The alternative does not meet the purpose and need. However, analysis of the no action alternative is required by CEQ regulations and provides a benchmark for comparing and analyzing the potential effects of the other alternatives.

3.0 Affected Environment and Environmental Consequences

Based on the analysis in the Final EA, construction and operation of the HCC would result in less than significant impacts. Table 3-1 summarizes the findings of the impact analysis by resource area.

Table 3-1. Summary of Impact Analysis

Resource Area	Proposed Action	No Action Alternative
Aesthetics	Aesthetic impacts associated with construction activities would be temporary and less than significant. The design of the Veterans Affairs (VA) Health Care Center (HCC) would be consistent with surrounding development and would not detract from the aesthetics of the area. Aesthetic impacts would be less than significant.	None

Air Quality	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Operation emissions would be less than significant. The only sensitive air quality receptor in the area is the William Beaumont Army Medical Center (WBAMC). Best management practices (BMPs) would be followed, and applicable permit requirements would be met. Air quality impacts would be less than significant.	None
Cultural and Historic Resources	No historic properties were identified within the area of potential effects (APE); therefore, no historic properties would be affected by the project. Cultural and historic resources impacts would be less than significant.	None
Geology and Soils	Ground disturbances would be stabilized during construction activities and permit requirements would be met. BMPs to limit impacts to the soil at the site would be implemented. Geology and soil impacts would be less than significant.	None
Hydrology and Water Quality	BMPs would be implemented to control stormwater at the site during construction and operation, and all applicable permit requirements would be met. Hydrology and water quality impacts would be less than significant.	None
Wildlife and Habitat	BMPs would be implemented to ensure wildlife does not enter the site during construction. Biological monitoring for the Texas Horned Lizard would be implemented during construction and a workforce protected species awareness training would be given in advance. Disturbed areas would be revegetated after construction is complete. Wildlife and habitat impacts would be less than significant.	None
Noise	Construction-related noise would be localized to traffic along the main roads. The only sensitive noise receptor in the area is the WBAMC. Ongoing operational noise would be minimal and primarily related to vehicular traffic. Noise impacts would be less than significant.	None

Land Use	The VA HCC site would remain compatible with surrounding commercial land uses. Land use impacts would be less than significant.	None
Floodplains, Wetlands, and Coastal Management	None	None
Socioeconomics	There would be employment-related, beneficial impacts as a result of the proposed VA HCC. The facility would also enhance health care for Veterans in the region. Socioeconomic impacts to would be less than significant.	None
Community Services	Construction activities at the proposed site are not expected to place additional substantial demands on police, fire, emergency services, or other community services. Community service impacts would be less than significant.	None
Solid Waste and Hazardous Materials	During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill; however, BMPs would be implemented to avoid any impacts from hazardous waste. Solid waste, including medical and biohazardous waste generated at the VA HCC, would be managed in accordance with applicable laws and regulations. Solid waste and hazardous material impacts would be less than significant.	None
Traffic, Transportation, and Parking	Traffic conditions are not anticipated to be significantly impacted by the facility. Parking would be sufficient to meet the employee and visitor demand of the new VA HCC. Traffic, transportation, and parking impacts would be less than significant.	None
Utilities	Electric, natural gas, water, and sewer utilities would need to be incorporated into the design of the site. Utilities in the area have the capacity to meet the VA HCC's projected demand. Utility impacts would be less than significant.	None

Environmental Justice	There would be no disproportionate impacts to minority or low-income populations. Environmental justice impacts would be less than significant.	None

4.0 Protection, Mitigation, and Compliance Measures

This section summarizes mitigation (if necessary) and protection measures, which are proposed to minimize and maintain potential adverse effects of the proposed action at acceptable, less-than-significant levels.

Per established protocols, procedures, and requirements, VA and its construction contractors would implement routine BMPs and would satisfy all applicable regulatory requirements in association with the proposed action. In general, implementation of such protection measures would maintain impacts at acceptable levels for all resource areas analyzed. These protection measures are different from mitigation measures, which are defined as project-specific requirements, not routinely implemented as part of development projects and are necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

The routine BMPs which are likely to be implemented for the proposed action are summarized in Table 4-1. The regulatory requirements consistent with the project's federal status that are anticipated to apply to the proposed action are summarized in Table 4-2. For a list of permits which may apply to the proposed action, see Appendix A. There have been no mitigation measures identified as necessary to reduce identified potentially significant adverse environmental impacts for the proposed action.

In addition, the following federal, state, and/or local environmental permits are anticipated as part of the proposed action. This list may not be exhaustive, and the selected developer will be responsible for any additional compliance and permits.

- National Pollutant Discharge Elimination System (NPDES) 1200-C Construction Stormwater Permit
- Texas Commission on Environmental Quality Construction General Permit (TXR150000)
- Texas Commission on Environmental Quality Title V Air Operating Permit

Table 4-1. Best Management Practices and Protection Measures for the Proposed Action

Resource Area	Description
Aesthetics	Design new buildings to be architecturally and aesthetically consistent with the with surrounding developments, including the adjacent WBAMC.
Air Quality	Use modern construction equipment with emissions controls, and properly maintain construction equipment.
	Reduce idling of construction equipment and vehicles to minimize exhaust emissions.

	Use appropriate fugitive dust suppression measures during construction activity (e.g., watering exposed areas during dry periods, tracking control for construction equipment accessing the site, limiting grading during excessively windy days, and stockpile stabilization practices).
Geology and Soils/ Hydrology and Water Quality	Implementation of dust controls, wind fences, perimeter controls, and soil stabilization practices would reduce the potential for soil erosion.
Cultural	Create and implement a project-related inadvertent discovery plan outlining procedures on what to do and who to contact if there is an inadvertent discovery as a result of any project-related excavation, grading, or ground-disturbing activities.
Hydrology and Water Quality	Utilize engineered stormwater retention systems during operation to manage impacts from precipitation events.
	Implement groundwater engineering controls if groundwater is encountered during construction.
Wildlife and Habitat	Install sediment control fence prior to initial grading activities to exclude any wildlife from the construction area. The exclusion fence should be buried at least six inches and be at least 24 inches high.
	Limit vehicular speeds within the project area to a maximum of 15-miles per hour.
	Cover open trenches or excavation areas overnight and inspect every morning to ensure no wildlife species have been trapped.
	Incorporate dark-sky lighting practices into the final design for the VA HCC.
	Utilize mulch with a tackifier to promote revegetation of disturbed areas rather than matting to avoid entanglement hazards to wildlife.
	Use no-till drilling, hydro-mulching, and/or hydro-seeding to reduce risk to wildlife.
	Avoid impacts to any burrows or other suitable habitat on the site, if feasible, and avoid or minimize disturbing or removing downed trees, rotting stumps, and leaf litter where feasible.
	Minimize vegetation clearing to the greatest extent practical. Revegetate temporarily impacted areas with native species, while incorporating pollinator conservation and management and invasive species control measures into a revegetation and maintenance plan to the extent practicable.
	Limit vegetation clearing to exclude the general bird nesting season, March 15th through September 15th, to avoid adverse impacts to breeding birds. Perform active bird nest surveys prior to planned clearing or construction, and a minimum 150-foot buffer of vegetation should remain around any active nests that are observed prior to disturbance.

	Limit construction activities like clearing or grading during April and May and after October to reduce risk to reptiles.
	When designing roads or parking areas with curbs, consider using Type I or Type III curbs to provide a gentle slope to enable turtles and small animals to get out of roadways.
	Provide an environmental awareness training that addresses protected species and protection measures prior to construction and implement a "No Kill Wildlife Policy" during the construction and operation of the site.
	Follow appropriate protocol if wildlife is encountered, as outlined by TPWD. Any translocations of reptiles should be the minimum distance possible, no greater than one mile and preferably within 100 to 200 yards from the initial encounter location. Contractors should be informed to allow reptiles found on the project site to safely leave the project area.
	Conduct biological monitoring by a permitted biologist during active construction involving ground-disturbing activities. Request the most recent Texas Natural Diversity Database data on a regular basis and report all encounters of Species of Greatest Conservation Need.
Noise	Coordinate proposed construction activities in advance with any nearby sensitive receptors (e.g., WBAMC).
	Shut down noise-generating heavy equipment when it is not needed and maintain equipment per manufacturer's recommendations to minimize noise generation.
	Utilize broadband, self-adjusting backup alarms in lieu of backup-beepers consistent with applicable safety requirements and encourage construction personnel to operate equipment in the quietest manner practicable.
Socioeconomics	Secure the construction area to prevent unauthorized access to the property and to reduce the potential of health and safety risks.
	Implement BMPs during construction to minimize and control construction noise and fugitive dust, as discussed in other sections of this report, which would minimize adverse impacts to the surrounding populations.
Community Services	Coordinate any short-term road closures with the El Paso Police and Fire Department and the adjacent WBAMC to prevent significant disruption to their services.
Solid Waste and Hazardous Materials	Properly storage with appropriate labeling of petroleum products and hazardous materials in approved containers.
	Provide a secondary containment system around fuel storage containers and during refueling activities.

	Should a spill or release occur, any impacted soil would be effectively managed per applicable federal and state laws and regulations.
	Conduct sampling of the HCC development site to further characterize the site and identify any potential soil contaminants. If soil contamination is found, it would be remediated in accordance with all applicable regulations prior to vertical construction.
	Recycle or divert debris in accordance with Fort Bliss's construction and demolition debris diversion policy.

Table 4-2. Regulatory Requirements for the Proposed Action

Resource Area	Regulatory Requirement
Air Quality	Title V permit (update if necessary)
	USEPA's Mandatory GHG Reporting Rule
Geology and Soils/ Hydrology and Water Quality	Erosion and Sediment Control Plan (ESCP)* Stormwater Pollution Prevention Plan (SWPPP)*
Noise	Occupational Safety and Health Act standards (29 CFR 1926.52)
Solid Waste and Hazardous Materials	Spill Prevention Control & Countermeasure Plan (SPCCP)
Community Services	Coordination with the El Paso Police and Fire Department, Fort Bliss, and the adjacent WBAMC on any temporary road closures or traffic configurations.

* These regulatory requirements are part of the National Pollutant Discharge Elimination System (NPDES) 1200-C Construction Stormwater Permit and the Texas Commission on Environmental Quality (TCEQ) Construction General Permit (TXR150000).

5.0 Agency Coordination and Public Participation

VA consulted with appropriate federal, state, and local regulatory agencies, and federally recognized Native American Tribes. The consultation is documented in the Final EA and supporting appendices.

The public was provided with an opportunity to review and comment on the Draft EA. VA received one letter of concurrence from the White Mountain Apache Tribe that the proposed action would have no adverse effects to the tribe's cultural heritage resources and historical properties and one letter from Texas Parks and Wildlife Department (TPWD) with comments on the Draft EA. TPWD's comments have been addressed in the Final EA.

After surveying efforts conducted by the VA for proposed utility corridors, the Texas Historical Commission concurred that construction and operation of the HCC would not affect any properties or archaeological sites eligible for listing in the National Register of Historic Places.

The VA also requested early coordination with the TPWD and received recommendations to assist in project planning and compliance with state and federal laws. These recommendations, as provided in Table 4-1, are also included in the Final EA.

6.0 Finding of No Significant Impact

After careful review of the Final EA, VA has concluded that implementation of the proposed action would not generate significant controversy or have a significant impact on the quality of the human or natural environment provided the selected developer implements the protection measures, including BMPs and regulatory requirements, identified in Section 4.0. This analysis fulfills the requirements of the National Environmental Policy Act of 1969 and is consistent with the VA and Council on Environmental Quality regulations implementing the Act. An environmental impact statement is not required.

Signatory:

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Signatory:

U.S. Army Fort Bliss

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James A. Brady
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Proposed El Paso Health Care Center
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Signatory:

El Paso Medical Center

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