Finding of No Significant Impact
U.S. Department Of Veterans Affairs
Proposed Construction and Operation of an Outpatient Clinic
Virginia Beach, Virginia

The U.S. Department of Veterans Affairs (VA) proposes to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Virginia Beach, Virginia (the Proposed Action). As required by the National Environmental Policy Act of 1969 (NEPA; 42 U.S. Code § 4321 et seq.), VA prepared an environmental assessment (EA) evaluating the Proposed Action. The Final EA was completed in July 2025 and is incorporated by reference.

Purpose and Need

The purpose of the Proposed Action is to provide outpatient health care services to area Veterans. The Proposed Action is needed to provide additional capacity within the VA Hampton Health Care System as identified through the VA Strategic Capital Investment Planning process and to reduce transportation times for routine appointments. The new OPC would broaden access to Veterans in the southside area of Hampton Roads, where the majority of Veterans in the Hampton Roads area live, and expand upon care currently provided at nearby, at-capacity community-based outpatient clinics.

Proposed Action

VA's Proposed Action is to award a lease to a private entity to construct an OPC on an approximately 33-acre site north of the intersection of Premium Outlets Boulevard and Northampton Boulevard in Virginia Beach, VA. The OPC building would be located in the central portion of the site. The OPC building footprint would be approximately 130,000 square-feet (SF), have approximately 246,000 building-square-feet, and not exceed three stories. The OPC building would be surrounded by parking areas with capacity for approximately 1,250 vehicles. Utilities for potable water, sewer, electric, and stormwater would be extended to the site. The OPC would include two diesel-fueled generators to provide emergency backup electrical power. A paved walking path would be constructed adjacent to the outer boundary of the parking lot, beyond which would be a 10- to 15-foot-wide vegetated landscape buffer on the eastern, western, and northern sides, separating the walking path from the adjacent properties. A marked pedestrian crosswalk is proposed across Premium Outlets Boulevard to connect the OPC to the Lake Wright trail entrance located on the west side of Premium Outlets Boulevard. The OPC would have a main entrance along Northampton Boulevard, with a two-lane access road extending north from the main entrance to the eastern side of the OPC parking lot. Additionally, a maintenance/ambulatory access road on Premium Outlets Boulevard would provide direct access to the western side of the OPC.

Under the Proposed Action, the private entity would be responsible for designing and constructing the OPC in compliance with VA design requirements, applicable federal, state, and local regulations, and to meet Green Globes certification. The OPC would be operated and staffed by the VA Hampton Health Care System, with approximately 600 new staff anticipated. VA would lease the OPC from the private entity for up to 20 years.

Alternatives

The EA examined two Action Alternatives at the Virginia Beach site for the implementation of the Proposed Action and the No Action Alternative.

- **Alternative 1**: The OPC building would have a footprint of approximately 130,000 SF and create approximately 21 acres of impervious surface area.

- **Alternative 2**: The OPC building would have a footprint of approximately 120,000 SF and create approximately 17 acres of impervious surface area.
- **No Action Alternative:** Under the No Action alternative, the Proposed Action would not be implemented. VA would continue to provide primary, mental health, and specialty care outpatient services at six existing clinics in the Virginia Beach area. The clinics would remain overburdened and limit VA's ability to provide modern, state-of-the-art health care services to Veterans in the region. The No Action alternative does not meet VA's purpose or need for the Proposed Action.

Potential Environmental Effects

The potential environmental effects associated with implementing the alternatives as analyzed in the Final EA are summarized in Table 1. The terms "effects" and "impacts" have the same meaning in this NEPA review.

Resource	Potential Effects of Alternatives 1 or 2	Potential Effects of No Action
Aesthetics	**Construction**: Conversion of former golf course to active construction site for approximately 18-24 months. Temporary impact due to presence of construction equipment and site clearing. No significant adverse impact. **Operation**: Conversion of former golf course to an active medical facility; landscaped vegetated buffer would surround development area. No significant adverse impact.	No impact
Air Quality	**Construction**: Temporary emissions including fugitive dust from grading, criteria pollutant and GHG emissions from construction equipment and vehicles. No significant adverse impact. **Operation**: Emissions from heating/ventilation and air conditioning (HVAC), emergency generator testing, and vehicles. Design and operate OPC to achieve Green Building Initiative Green Globes certification. No significant adverse impact.	No impact
Wildlife and Habitat	**Construction**: Biological survey identified clusters of trees potentially providing low quality habitat for federal and state listed bats. Vegetation clearing with minor habitat loss; time-of-year restrictions on tree clearing and pre-construction surveys to avoid bat and bird impacts. No significant adverse impact. **Operation**: No additional impact beyond site development. No significant adverse impact.	No impact

Resource	Potential Effects of Alternatives 1 or 2	Potential Effects of No Action
Floodplains, Wetlands, and Coastal Zone	**Floodplains**: Site is outside of 100- and 500-year floodplains. No impact. **Wetlands**: **Construction and operation** - Two small wetlands (less than 0.1 acre) in central portion of site to be filled with Virginia Department of Environmental Quality (VDEQ) permit approval; mitigation required by VDEQ. No significant adverse impact. **Coastal Zone: Construction and operation -** consistent with Virginia coastal zone policies. No significant adverse impact.	No impact
Cultural and Historic Resources	**Construction and Operation**: No National Register of Historic Places-listed or -eligible historic properties present at the site; no historic properties affected. No impact.	No impact
Geology and Soils	**Construction**: Soil erosion potential managed with VDEQ permit-required best management practices (BMPs); OPC building foundation not anticipated to encounter bedrock. Conversion of prime farmland would not lead to loss of agricultural production elsewhere. No significant adverse impact. **Operation**: No mechanisms to further impact soil or cause erosion during operation of the OPC. No impact.	No impact
Hydrology and Water Quality	**Construction**: Construction stormwater runoff management required through VDEQ permit; BMPs to prevent sedimentation. Groundwater is several hundred feet below grade, no impact from construction. No significant adverse impact. **Operation**: New impervious surfaces would increase stormwater, which would discharge to storm sewers operated by the City of Virginia Beach; stormwater controls avoid impacts. Groundwater is several hundred feet below grade, no impact from operation. No significant adverse impact.	No impact
Land Use	**Construction**: Consistent with City of Virginia Beach and City of Norfolk zoning and plans for high density mixed-use development in this area. No significant adverse impact. **Operation**: Use of site for an OPC is consistent with planned land use. No significant adverse impact.	No impact
Noise and Vibration	**Construction**: Noise minimized through equipment maintenance, daytime use, and common construction BMPs. Temporary, negligible vibration impacts to sensitive receptors minimized by distance and assessed further in final design. No significant adverse impact. **Operation**: Noise from vehicle traffic, HVAC systems, and emergency generator testing. No significant adverse impact. No vibration impacts on sensitive receptors.	No impact

Resource	Potential Effects of Alternatives 1 or 2	Potential Effects of No Action
Solid Waste and Hazardous Materials	**Construction**: Phase I Environmental Site Assessment did not identify any recognized environmental conditions at the site. Construction wastes managed per regulations; recycled or reused to extent practicable. No significant adverse impact. **Operation**: Routine wastes managed per federal and state regulations. No significant adverse impact.	No impact
Traffic, Transportation, and Parking	**Construction**: Private entity to obtain Virginia Department of Transportation (VDOT) permits for road and right-of-way modifications, as well as coordinate with the Cities of Virginia Beach and Norfolk for entrance locations and roadway designs. Temporary traffic disruptions mitigated through planning. No significant adverse impact. **Operation**: While traffic forecasts suggest a potential decline in level of service by year 2044, any future decisions regarding mitigation should consider conditions and information available at that time. The private entity would be responsible for future coordination with VDOT and implementing mitigation, if warranted. No significant adverse impact.	No impact
Utilities	**Construction**: Utilities services are available; extension to site is required and responsibility of the private entity. Private entity to obtain right-of-way permits for utility extensions as needed. No significant adverse impact. **Operation**: Increased demand from OPC is within system capacity; operational utility use not anticipated to impact service quality to existing customers. No significant adverse impact.	No impact
Community Services	**Construction**: No impact on community services. **Operation**: Significant long-term benefit to community services by improving Veteran health care access. No impact on other local community services.	Long-term significant adverse impact; existing VA clinics would remain overburdened.
Socioeconomics	**Construction**: Beneficial short-term impact due to spending on labor and material. **Operation**: Beneficial long-term impact through new staffing and spending on local economy, but no impact at regional or state level. No significant beneficial or adverse impact.	No impact

Resource	Potential Effects of Alternatives 1 or 2	Potential Effects of No Action
Potential for generating substantial controversy	Community support for improving Veterans' medical care is anticipated.	Controversy anticipated as existing VA clinics would remain overburdened.

The project-specific protection and mitigation measures listed in Attachment A are incorporated into the Proposed Action and would ensure the potential adverse effects would be less than significant. VA would require the developer to construct and operate the Proposed Action in accordance with these measures and comply with the agreements developed in the Endangered Species Act and Virginia Department of Environmental Quality consultation processes.

Public Comment and Agency Consultation

VA requested public and agency scoping input in October 2024 and published the Draft EA for public and agency comment in May 2025. In each case, newspaper notices were published in the *Virginia-Pilot* and VA notified agencies, Tribes, and other stakeholders via email.

VA received four scoping comment submissions and two comment submissions on the Draft EA. Comments were considered in developing the EA. Responses to each comment submission are included in the Final EA.

VA consulted with the U.S. Fish and Wildlife Service (USFWS) Virginia Ecological Services Field Office on potential effects of the Proposed Action to the federally listed northern long-eared bat and tricolored bat and to birds protected under the Migratory Bird Treaty Act (MBTA) under Section 7 of the Endangered Species Act. VA also consulted with the Virginia Department of Wildlife Resources (VDWR) on the potential effects of the Proposed Action to the state listed Rafinesque's eastern big-eared bat and little brown bat. The Final EA includes the consultation correspondence and summarizes the outcome of the consultation, including the USFWS conclusion of "may affect not likely to adversely affect" the northern long-eared bat and tricolored bat by implementing a time-of-year-restriction on tree clearing or performing surveys prior to clearing, and preconstruction clearance surveys for birds protected under the MBTA. VDWR concurred that these impact avoidance measures would also be protective of state listed Rafinesque's eastern big-eared bat and little brown bat.

VA consulted under Section 106 of the NHPA with the Virginia State Historic Preservation Office and federally recognized Tribes on potential effects of the Proposed Action on historic properties. The Final EA includes the consultation correspondence and summarizes the outcome of the consultation, including the State Historic Preservation Office's concurrence with VA's finding of no historic properties affected.

Finding of No Significant Impact

Based on the analyses in the Final EA, which is summarized and incorporated by reference herein, VA concludes that implementing either Action Alternative would have no significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(2)(C) of NEPA. Therefore, preparation of an environmental impact statement is not required.

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Attachment A: Best Management Practices, Management, Minimization, and Mitigation Measures Incorporated into the Proposed Action

ATTACHMENT A

Best Management Practices, Management, Minimization, and Mitigation Measures Incorporated into the Proposed Action

Resource	Protection and Mitigation Measures
Aesthetics	The private entity would professionally manage the OPC and the landscaped grounds at the site to maintain its appearance throughout the duration of VA's lease.
Air Quality	Design and operate the OPC to achieve Green Globes certification. To minimize generating fugitive dust during land-disturbing activities, VDEQ requires use of control methods outlined in 9VAC5-50-60 *et seq.* of the Regulations for the Control and Abatement of Air Pollution. The private entity would implement these precautions that include, but are not limited to, the following: ▪ Use, where possible, of water or suitable chemicals for dust control during the proposed demolition and construction operations and from material stockpiles; ▪ Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials; ▪ Covering of open equipment for conveying materials; and ▪ Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion. VDEQ also recommends necessary precautions to restrict the emissions of VOCs and NO_X from asphalt paving during construction. A precaution, which typically applies to road construction and paving work (9VAC5-45-780 *et seq*.), places limitations on the use of "cut-back" (liquefied asphalt cement, blended with petroleum solvents), and may apply to the Proposed Action. The asphalt must be "emulsified" (predominantly cement and water with a small amount of emulsifying agent) except when specified circumstances apply. Moreover, there are time-of-year restrictions on its use from April through October in VOC emission control areas. The private entity would implement these precautions during construction paving. To the extent practicable, for construction equipment greater than 150 horsepower, aim to meet USEPA/CARB Tier 4 emissions standards, or Tier 3 standards if Tier 4 equipment is not available at the time of construction; tune and maintain all construction equipment in accordance with the equipment manufacturer's recommended maintenance schedule and specifications; use low-sulfur diesel or biodiesel in construction equipment; and diesel-powered vehicles may idle for up to 10 minutes to minimize restart problems, but turned off after 10 minutes when not in use (VAC 1985).

Resource	Protection and Mitigation Measures
Wildlife and Habitat	Avoid tree removal and trimming during both the torpor season time-of-year restriction from December 15 – February 15 and the summer occupancy time-of-year restriction from April 1 – July 15 to minimize potential impacts to federal and state listed bats. Perform presence/probable absence surveys for listed bats prior to any clearing between March 1 and October 15. Perform preconstruction clearance surveys for MBTA birds and state-listed nesting birds prior to any clearing between March 15 and August 15.
Wetlands	Obtain VDEQ VWP permit to fill wetlands and complete VDEQ-required mitigation for the permanent loss of wetlands at the site.
Soils	Obtain a General VPDES CGP from VDEQ [the Virginia Erosion and Sediment Control Program [VESCP]/Virginia Stormwater Management Program [VSMP] authority) including providing an SWPPP, an ESC plan, an SWM plan, and a Stormwater Management Facility Maintenance Agreement. Adhere to RMA performance criteria including compliance with the requirements of the Virginia Stormwater Management Handbook, Version 1.1. Implement spill and leak prevention and response procedures to reduce the impacts of incidental releases of vehicle fluids (such as diesel or hydraulic fluids), including maintaining a complete spill kit at the site. Report releases of regulated quantities of petroleum-based fluids to VDEQ and conduct cleanup per state regulatory requirements
Hydrology and Water Quality	Construction stormwater runoff to be managed through VDEQ permit-required BMPs; demonstrate consistency with Chesapeake Bay TMDL goals; and implement a construction Spill Prevention, Control, and Countermeasure plan. Adhere to RMA performance criteria including compliance with the requirements of the Virginia Stormwater Management Handbook, Version 1.1.
Noise and Vibration	Comply with City of Virginia Beach noise ordinance during construction and operation. If necessary during construction, use shields or other physical barriers to restrict noise transmission; provide soundproof housings or enclosures for noise producing machinery; use efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified; conduct truck loading, unloading, and hauling operations so that noise is kept to a minimum; select material transportation routes as far away from sensitive receptors as possible; shut down noise-generating heavy equipment when not in use. Implement a hearing conservation program when construction worker noise exposure is at or above 85 decibels averaged over 8 working hours, or above 90 dBA over an 8-hour time-weighted average, including providing hearing protection.

Resource	Protection and Mitigation Measures
Vibration	Potential construction-period vibration impacts would be assessed during the final design phase, when construction methods and the locations of specific types of construction equipment have been identified. Measures for reducing vibration impact to sensitive receptors would be considered in the development of construction plans for areas where construction activities causing short-term perceptible vibration could be required.
Solid Waste and Hazardous Materials	Recycle or reuse construction debris to the maximum extent practicable.
Traffic, Transportation, and Parking	Obtain and comply with the conditions of a Land Use Permit from the VDOT for the construction of entrances to the OPC. Entrance locations and roadway design shall be coordinated with City of Virginia Beach Traffic Engineering. A site plan must be submitted to the City of Virginia Beach Development Services Center for work in City right-of-way. Work in the City of Virginia Beach right-of-way shall be designed in accordance with the City of Virginia Beach Public Works Design Manual and Public Utilities Design Manual. Obtain and comply with a Right-of-Way-Use Permit from the City of Virginia Beach and City of Norfolk for the construction of the maintenance/ambulance entrance from Premium Outlets Boulevard. Obtain and comply with a Street, Lane, or Sidewalk Closure Permit for any work within the right-of-way which closes or prevents access to the roadway, driveway entrances, sidewalk, or blocks any lanes of traffic for more than fifteen minutes. Obtain approval from the City of Virginia Beach and City of Norfolk for any traffic detours and/or lane closures.

Resource	Protection and Mitigation Measures
Utilities	Apply for and obtain a Land Use Permit for work or activity on or crossing any right-of-way under the jurisdiction of the VDOT. Utility connections shall be coordinated with the City of Virginia Beach Public Utilities Engineering. Potentially applicable sanitary sewerage permits may include but not be limited to a Sewage Handling Permit from the VDH to discharge to the municipal Department of Public Works. Should the final design include connecting to and discharging to the City of Virginia Beach sewage system, the private entity would be required to adhere to the Commercial/Multi-Family Utility Connection New Construction process (Virginia Beach 2024), including submission of a completed commercial American Water Works Association calculation form. Obtain any permits or approvals required by Dominion Energy and local telecommunications providers to extend service to the OPC. Design and operate the OPC to achieve Green Globes certification to ensure efficient use of electricity, water, and sewerage and stormwater infrastructure during operation of the OPC. The selected private entity would be required to maintain any privately-owned on-site utility infrastructure required to operation of the Proposed Action for the duration of VA's lease. Obtain permits to discharge operational stormwater to the City of Virginia Beach stormwater management systems.