

DRAFT

ENVIRONMENTAL ASSESSMENT
OF THE PROPOSED
VA OUTPATIENT CLINIC AND
MENTAL HEALTH CLINIC
ALACHUA COUNTY, FLORIDA



DEPARTMENT OF VETERANS AFFAIRS

425 I STREET, NW

WASHINGTON, DC 20001

PREPARED BY:

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JULY 24, 2019

EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs' (VA's) proposed establishment of an approximately 70,849 net useable square-foot (NUSF) Outpatient Clinic (OPC) and an approximately 39,932 NUSF Mental Health Clinic (MHC) in the Gainesville, Florida area (Alachua County). Preparation of this EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 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). This EA has also been prepared in accordance with *VA NEPA Interim Guidance for Projects* dated 30 September 2010.

PROPOSED ACTION

VA's Proposed Action is to establish an approximately 70,849 NUSF, two-story OPC, including required parking (approximately 500 surface parking spaces) and an approximately 39,932 NUSF, one to two-story MHC, including required parking (approximately 300 surface parking spaces) in the Gainesville, Alachua County, Florida, area. The proposed OPC and MHC are separate, but related, proposed lease procurement/development projects.

The proposed OPC would reduce space and workload pressures at the overcrowded Malcolm Randall Medical Center (Gainesville VAMC) and would expand primary health care services to area Veterans. Primary care services currently provided by the Gainesville VAMC would be relocated to the OPC.

The proposed MHC would consolidate and replace two existing, undersized leased VA mental health care clinics (three leases) in the Gainesville area with a new, appropriately sized, centralized facility.

VA would select developers (VA developers) to construct the proposed OPC and MHC on build-to-suit bases, and then lease the facilities to VA for up to 20 years.

PURPOSE AND NEED

The purpose of the Proposed Action is to provide enhanced and expanded outpatient health care and mental health services to Veterans in the Gainesville, Florida, area in integrated, right-sized, energy-efficient facilities. The proposed OPC would decompress the overcrowded Gainesville VAMC and would provide an appropriately sized facility for VA to expand its primary care services to Veterans in the region. The proposed MHC would provide a centralized, appropriately sized facility to consolidate and expand 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 Gainesville VAMC is overcrowded and space-constrained and insufficient to meet the current and rapidly growing health care needs of area Veterans. The two existing VA-leased mental health clinics in the Gainesville area are undersized (total 21,360 NUSF) and insufficient to meet the current and projected future mental health needs of Veterans in the area. In addition, operating separate mental health clinics in the area creates operational inefficiencies, poorly integrated services, and increases costs.

The Proposed Action would result in improved health care for Gainesville area Veterans by providing expanded and enhanced primary care and mental health care services in new, appropriately sized, centralized and enhanced, modern facilities.

ALTERNATIVES

Four sites (Sites 1-4) are being considered for the proposed OPC and MHC developments. The proposed OPC and MHC may be co-located or established on separate sites. Possible development scenarios for the four sites are:

- Site 1 – Both the OPC and the MHC, only the OPC, only the MHC, or no development.
- Site 2 – Both the OPC and the MHC, only the OPC, only the MHC, or no development.
- Site 3 – Only the OPC, only the MHC, or no development.
- Site 4 – Only the MHC or no development.

This EA examines in depth the implementation of the Proposed Action at one of the four Action Alternative sites (co-located OPC and MHC on Sites 1 or 2) or two of the four Action Alternative sites (separate OPC and MHC on Sites 1, 2, 3, and/or 4), and the No Action Alternative.

Site 1 (SW 34th Street between Williston Road and SW 56th Avenue): Site 1 includes approximately 17 acres of unimproved wooded land. Site 1 is southeast of the intersection of Williston Road and SW 34th Street and northeast of the intersection of SW 34th Street and SW 56th Avenue in an unincorporated area of Alachua County. Site 1 was unimproved pasture land prior to the 1990s and has gradually become reforested since the 1990s. Primary and secondary access to the OPC and MHC would be from SW 34th Street. If selected, the OPC would be located on the southern portion of Site 1 and/or the MHC would be located on the northern portion of Site 1.

Site 2 (NW 95th Boulevard): Site 2 includes approximately 18.6 acres of unimproved grassy land (northern and eastern portions), wooded land (majority of Site 2), two small wetlands in the southeastern portion, and an abandoned road (NW 95th Court) in the south-central portion. Site 2 is located on the north side of NW 95th Boulevard, just north of the Interstate 75/NW 39th Avenue interchange and west of NW 92 Court, in an unincorporated area of Alachua County. Site 2 was mostly unimproved farmland from at least the 1800s to the early 2000s with two to five small buildings, likely residences and/or agricultural buildings, in the central portion of the Site from approximately 1940 until approximately 2006. Since the early 2000s, the majority of Site 2 has

gradually become reforested, while the northern and eastern portions continued to be farmed or maintained until the early 2010s and have been vacant grassy land since the early 2010s. Primary and secondary access to the OPC and MHC would be from a proposed road adjoining to the north of Site 2. If selected, the OPC would be located on the western portion of Site 2 and/or the MHC would be located on the eastern portion of Site 2, north of the wetlands.

Site 3 (2100 NW 53rd Avenue): Site 3 includes approximately 8 acres of unimproved wooded land. Site 3 is located at the northwest corner of the intersection of NW 53rd Avenue and northwest of NW 55th Avenue, within the City of Gainesville. Site 3 was wooded land from at least the 1930s to the 1950s, was cleared of trees in the 1950s, and has gradually become reforested since the 1950s. Primary access to the OPC or MHC would be from NW 53rd Avenue. Secondary access would be from NW 55th Boulevard.

Site 4 (SW 24th Avenue): Site 4 includes approximately 8.5 acres of unimproved wooded and grassy land. Site 4 is located southeast of the intersection of SW 24th Avenue and SW 75th Street/Tower Road in an unincorporated area of Alachua County. Site 4 was mostly wooded land from at least the 1930s until approximately 2007, when the eastern portion of the site was mostly cleared of trees. A dirt road and small structure (possible residence) appears to have been present within the woods in the southern portion of the site from approximately 1988 until the early 2000s. Access to the MHC would be from SW 24th Avenue and SW 75th Street.

With any of the Action Alternatives, the VA developer(s) would build and own the OPC and MHC, and would be responsible to design and construct the facilities in compliance with VA design requirements and applicable federal, state, and local regulations. The OPC would be an approximately 70,849 NUSF, two-story, slab-on-grade structure with associated paved surface parking (approximately 500 spaces). The MHC would be an approximately 39,932 NUSF, one to two-story, slab-on-grade structure with associated paved surface parking (approximately 300 spaces). The VA design requirements specify that the OPC and MHC developments must meet a minimum rating of two Green Globes for new construction and sustainable interiors and the buildings are required to earn an Energy Star label. These VA contract design requirements ensure that the OPC and MHC would be sustainably developed. The facilities would be leased and operated by VA.

VA anticipates construction of the proposed OPC and MHC would begin in 2020 and that the OPC and MHC would be open in 2022. The new OPC would provide primary care and outpatient services to the area's Veterans, services currently provided by the Gainesville VAMC. Primary care services would be relocated from the VAMC to the OPC, allowing VA to decompress other operations at the VAMC. The new MHC would provide mental health care outpatient services to the area's Veterans. This function is currently provided by the two small existing VA-leased facilities in the Gainesville area. VA would no longer lease or operate these facilities once the proposed MHC is open and the existing leases expire.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. VA would continue to provide primary care outpatient services at the Gainesville VAMC and mental health services at two small VA-leased facilities in the area. The Action Alternative sites likely would remain vacant in the near future and ultimately be developed by others for other commercial use or residential use (Site 3), in accordance with local zoning. This alternative would limit VA's ability to provide necessary health care services to U.S. Veterans in the region, and would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was retained to provide a comparative baseline analysis as required under the CEQ regulations.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The affected environment of the Action Alternative sites and their immediate surroundings, or the Region of Influence (ROI) of the Proposed Action, is discussed in Section 3 of this EA.

The considered alternatives, including the implementation of the Proposed Action at one (co-located OPC and MHC) or two (separate OPC and MHC) of the four Action Alternative sites and the No Action Alternative, are evaluated in this EA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action's ROI. Technical areas evaluated in this EA include:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid Waste and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

Action Alternatives

The Action Alternatives would result in the impacts identified throughout Section 3 and summarized in Table 10. These include short-term and/or long-term potential adverse impacts to aesthetics (Sites 1, 3, and 4), air quality, cultural resources (Sites 1, 3, and 4), soil and geology, hydrology and water quality (Sites 1 and 2), wildlife and habitat (Sites 1, 2, and 4), noise (Sites 3 and 4), land use (Site 3), wetlands (Sites 1, 2, and 4), floodplains (Site 4), solid waste and hazardous materials, and transportation. All of these impacts are less than significant and would be further reduced through careful coordination and implementation of the general best management practices (BMPs), management measures, and compliance with regulatory requirements, as identified in Section 5.

Based on the available information, no historic properties listed on the National Register of Historic Properties (NRHP) or eligible for listing on the NRHP are known to be present at any of the Action Alternative sites or would be impacted by the Proposed Action. Sites 1, 3, and 4 are

located in areas that may contain archaeological resources; these sites have not been fully assessed for these resources. Archaeological investigations of these sites are being conducted. The results of these investigations will be provided to Florida Division of Historical Resources (SHPO). If archaeological resources eligible for listing on the NRHP are identified at the selected site(s) that could be impacted by the proposed OPC and MHC developments, VA would enter into a Memorandum of Agreement (MOA) under Section 106 of the National Historic Preservation Act (NHPA) with the Florida SHPO, Advisory Council on Historic Preservation (ACHP), and other interested consulting parties to mitigate the adverse effects. Mitigation measures may include avoidance of the archaeological resources during site design, further exploration for data inventory and recovery, and/or archaeological monitoring during excavation work associated with the OPC and MHC construction. With the completion of these NHPA mitigation measures, if necessary, potential cultural resources impact at Sites 1, 3 and 4 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 to the health of U.S. Veterans in the region would occur should the new OPC and new MHC be constructed at one or two of the Action Alternative sites.

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.

AGENCY AND PUBLIC INVOLVEMENT

Agencies consulted for this EA include:

- U.S. Fish and Wildlife Service (USFWS)
- U.S. Environmental Protection Agency (USEPA)
- U.S. Army Corps of Engineers (USACE)
- U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS)
- Florida Fish and Wildlife Conservation Commission (FFWCC)
- Florida Division of Historical Resources (State Historic Preservation Office or SHPO)
- Florida Department of Environmental Protection (FDEP), various divisions
- Florida Department of Transportation (FLDOT)
- Florida Department of Agriculture and Consumer Services (FDACS)
- Florida Natural Areas Inventory (FNAI)
- St. Johns River Water Management District (SJRWMD)
- Alachua County (various divisions)
- City of Gainesville (various departments)

Responses were received from USEPA, USFWS, Florida SHPO, FFWCC, FNAI, FDEP-Florida State Clearinghouse (FSCH), SJRWMD, and various Alachua County divisions. Input provided by these agencies is summarized in Section 4. Agency information and comments have been incorporated into this EA, as and where appropriate. Copies of relevant correspondence can be found in Appendix A.

Three federally recognized Native American Tribes [Coushatta Tribe of Louisiana, Miccosukee Tribe of Indians, and the Muscogee (Creek) Nation] were identified as having possible ancestral ties to the area of the Action Alternative sites. VA invited each of these Tribes to provide input regarding the Proposed Action. A response was received from the Coushatta Tribe of Louisiana. Tribal information and comments have been incorporated into this EA (Section 3.4). Tribal input is summarized in Section 4. Tribal correspondence is provided in Appendix B.

VA will publish and distribute the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in a local newspaper of general circulation (Gainesville Sun). A copy of the Draft EA will be made available for public review at a local public library. VA will respond to public comments within the Final EA.

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SECTION 1: INTRODUCTION

1.1 Introduction

This Section provides the reader with necessary introductory and background information concerning the Proposed Action for proper analytical context and identifies the purpose of and need for the Proposed Action and the federal decision to be made.

This Environmental Assessment (EA) has been prepared as required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 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). This EA is required to determine if VA's Proposed Action would have significant environmental impacts. Federal agencies are required to consider the environmental and related social and economic effects of their proposed actions. This EA has been prepared in accordance with VA's *NEPA Interim Guidance for Projects* (2010).

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed construction and operation of:

- An approximately 70,849 net usable square-foot (NUSF), two-story, slab-on-grade Outpatient Clinic (OPC) with associated surface parking (approximately 500 spaces); other required site improvements and amenities; and landscaped open space areas.
- An approximately 39,932 NUSF, one to two-story, slab-on-grade Mental Health Clinic (MHC) with associated surface parking (approximately 300 spaces); other required site improvements and amenities; and landscaped open space areas.

These facilities would be co-located on one of two sites (Sites 1 or 2) or established separately on two of four sites (Sites 1, 2, 3, and/or 4) in the Gainesville, Florida, area (Alachua County). Figure 1 depicts the general locations of the four sites.

In accordance with the above regulations, this EA: allows for public input into the federal decision-making process; provides federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; identifies measures the federal decision-maker could implement to reduce potential environmental effects; and documents the NEPA process.

1.2 Background

The Malcom Randall VA Medical Center (1601 SW Archer Road) in Gainesville (Gainesville VAMC) is one of two VAMCs in the North Florida/South Georgia Veterans Health System, which also includes the Lake City VAMC in Lake City, Florida, and twelve outpatient clinics in

Jacksonville, Tallahassee, Lecanto, Marianna, Ocala, Palatka, Perry, St. Augustine, and The Villages, Florida, and St. Mary's, Valdosta, and Waycross, Georgia. The Gainesville VAMC and Lake City VAMC and their associated clinics offer primary care, tertiary care, and long-term care in areas of medicine, surgery, psychiatry, physical medicine and rehabilitation, spinal cord injury, neurology, oncology, dentistry, geriatrics, and extended care services to Veterans in central northern Florida and southern Georgia.

The Gainesville VAMC, which provides primary health care services to Gainesville area Veterans, is overcrowded and space-constrained and insufficient to meet the current and future projected health care needs of area Veterans.

VA provides mental health services at two small VA-leased facilities (three leases) in the Gainesville area, located at 620 NW 16th Street and 825 NW 23rd Street, which are undersized and insufficient to meet the current and future projected mental health care needs of area Veterans.

In 2018, Congress authorized VA, under the Veterans Access, Choice, and Accountability Act, to establish a new OPC in the Gainesville area, which would reduce space and workload pressures at the Gainesville VAMC by moving primary health care services to a new, off-site, leased location. In addition, Congress authorized VA to establish a new, larger MHC in the Gainesville area to consolidate and replace the two existing, undersized leased mental health clinics. The new facilities would enhance VA outpatient services by closing space and utilization gaps identified in the VA Strategic Capital Investment Planning (SCIP) process and would reduce patient wait times. The new facilities would expand and enhance primary care and mental health services in appropriately sized and efficient state-of-the-art facilities to meet the requirements of the VHA Health Care Uniform Benefits package.

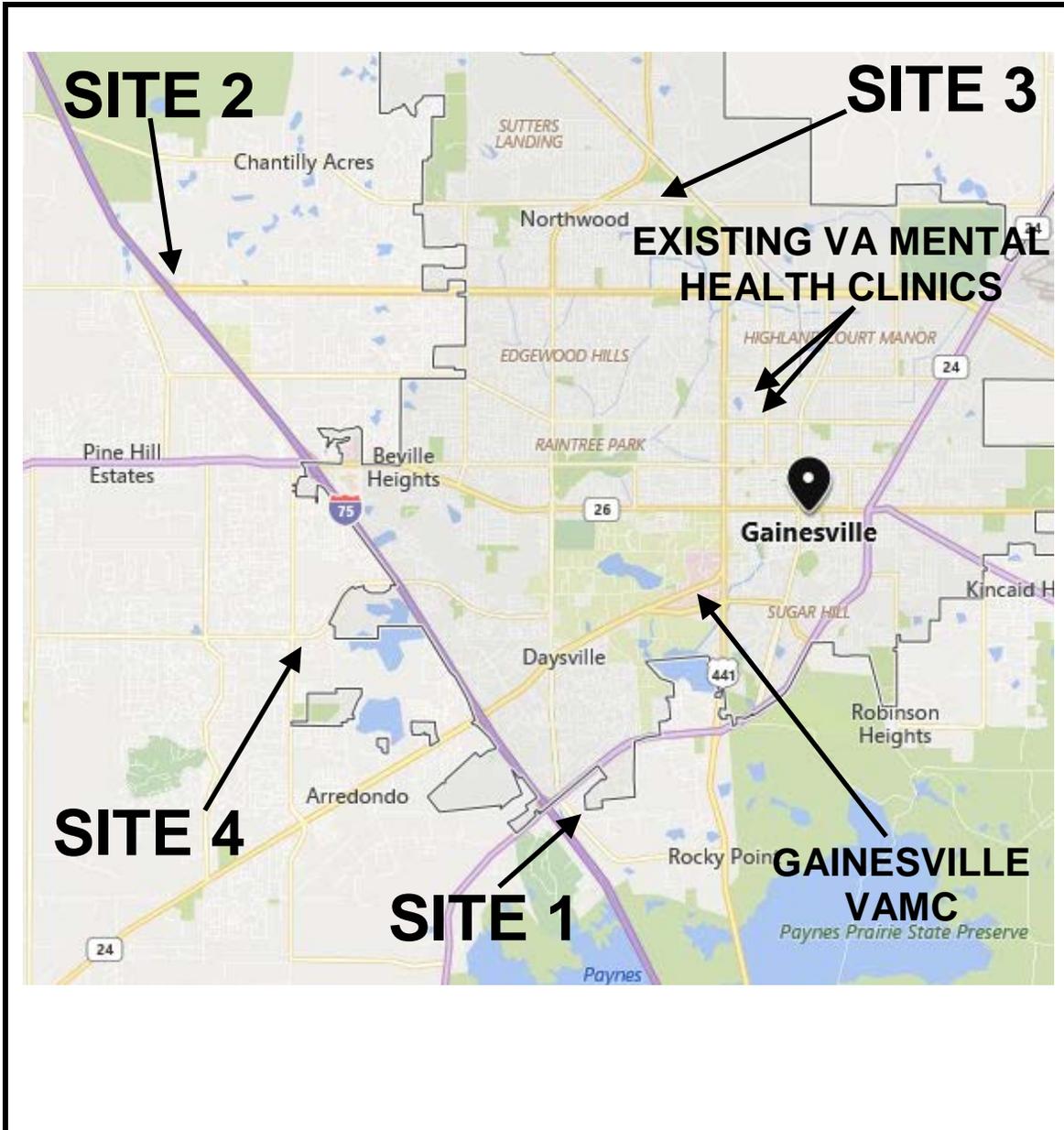


FIGURE 1
REGIONAL LOCATION MAP
ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, DC

TTL PROJECT NO. 1817601



1.3 Purpose and Need

The purpose of the Proposed Action is to provide enhanced and expanded outpatient health care and mental health services to Veterans in the Gainesville, Florida, area in integrated, right-sized, energy-efficient facilities. The proposed OPC would decompress the overcrowded Gainesville VAMC and would provide an appropriately sized facility for VA to expand its primary care services to Veterans in the region. The proposed MHC would provide a centralized, appropriately sized facility to consolidate and expand 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 Gainesville VAMC is overcrowded and space-constrained and insufficient to meet the current and rapidly growing health care needs of area Veterans. The two existing VA-leased mental health clinics in the Gainesville area are undersized (total 21,360 NUSF) and insufficient to meet the current and projected future mental health needs of Veterans in the area. In addition, operating separate mental health clinics in the area creates operational inefficiencies, poorly integrated services, and increases costs.

The Proposed Action would result in improved health care for Gainesville area Veterans by providing expanded and enhanced primary care and mental health care services in new, appropriately sized, centralized and enhanced, modern facilities.

1.4 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed construction and operation of a new OPC and a new MHC in the Gainesville, Florida, area (Alachua County).

VA, as a federal agency, is required to incorporate environmental considerations into their decision-making process for the actions they propose to undertake. This is done in accordance with the regulations identified in Section 1.1.

In accordance with the above regulations, VA has prepared this EA. This EA allows for public input into the federal decision-making process; provides federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; and documents the NEPA process.

Ultimately, VA will decide, in part based on the analysis presented in this EA and after having taken potential environmental, cultural, and socioeconomic effects into account, whether VA should implement the Proposed Action, and, as appropriate, carry out mitigation and management measures to reduce effects on the environment.

SECTION 2: DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This Section provides the reader with necessary information regarding the Proposed Action and its alternatives, including those that VA initially considered, but eliminated, and the reasons for eliminating them. The screening criteria and process developed and applied by VA to hone the number of viable sites are described, providing the reader with an understanding of VA's rationale in ultimately analyzing four Action Alternative sites in this EA.

2.2 Proposed Action

VA's Proposed Action is to establish an approximately 70,849 NUSF, two-story OPC, including required parking (approximately 500 surface parking spaces) and an approximately 39,932 NUSF, one to two-story MHC, including required parking (approximately 300 surface parking spaces) in the Gainesville, Alachua County, Florida, area. The proposed OPC and MHC are separate, but related, proposed lease procurement/development projects.

VA established the sizes of the facilities and land area required for this proposal based on the number of Veterans currently receiving primary health care services at the Gainesville VAMC and mental health services at the existing Gainesville area clinics, and those Veterans forecasted to require such services over the anticipated 20-year life of the proposed OPC and MHC. The proposed OPC would reduce space and workload pressures at the Gainesville VAMC and would expand health care services to area Veterans. Primary care services provided by the Gainesville VAMC would be relocated to the OPC. The proposed MHC would consolidate and replace two existing undersized leased VA mental health care clinics in the Gainesville area with a new, appropriately sized, centralized facility. VA would select developers (VA developers), who would construct the proposed OPC and MHC for VA on a build-to-suit basis, and then lease them to VA for up to 20 years.

The OPC and MHC would provide primary care and mental health care outpatient services, respectively, to Gainesville area Veterans. The OPC and MHC would comply with the Americans with Disabilities Act and meet all requirements set forth in EO 13834: *Efficient Federal Operations*. The facilities would be designed and built to VA design criteria and in accordance with local building and zoning codes.

The OPC and MHC would be used Monday through Friday except on federal holidays, and would operate from 7:00 am to 5:00 pm. The OPC would provide space for an estimated approximately 500 vehicle stops (staff, patients, volunteers, and other guests) on an average, daily basis. The MHC would provide space for an estimated 300 vehicle stops on an average daily basis. Staff and patients would primarily be drawn from the Gainesville VAMC and current Gainesville area mental health clinics; however, some additional VA staff would likely be required for the expanded services. The OPC and MHC would be available to Veterans and service members from all branches of the U.S. Armed Forces who meet the criteria for treatment.

2.3 Alternatives Analysis

The CEQ and VA regulations for implementing NEPA require reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered “reasonable” only if it would enable VA to accomplish the primary mission of providing suitable health care facilities that meet the purpose of and need for the Proposed Action. “Unreasonable” alternatives would not enable VA to meet the purpose of and need for the Proposed Action.

2.3.1 Alternatives Development

VA undertook a sequential planning and screening process, seeking viable alternatives for the Proposed Action. The results of this process are summarized below:

- After identifying the inadequacies of the Gainesville VAMC and the two leased Gainesville mental health clinics to meet the current and increasing demand for primary health care and mental health care services, respectively, by area Veterans, VA examined these facilities for their potential to support the Proposed Action. The Gainesville VAMC is overcrowded and space-constrained with no available space for new construction or expansion. The two leased mental health clinics cannot be expanded beyond their current sizes. In addition, continued operation of two separate facilities would not enable VA to provide centralized, consolidated mental health services. As such, VA determined that the existing facilities could not be expanded, modified, or renovated to meet the purpose and need for the Proposed Action.
- VA then advertised (via a pre-solicitation) for developable land (for new construction) or existing buildings of sufficient size located within Alachua County, Florida, that would accommodate a 70,849 NUSF two-story OPC with 500 on-site parking spaces. Separately, VA advertised (via a pre-solicitation) for developable land (for new construction) or existing buildings of sufficient size located within in Alachua County, Florida that would accommodate a 39,932 NUSF one to two-story MHC with 300 on-site parking spaces.
- VA received several responses (expressions of interest) to these advertisements. VA evaluated each of these sites based on surrounding land uses; location of nearest emergency response services; aesthetic quality; current zoning; accessibility to highways, public transportation, shopping, restaurants, and other features; utility availability; overall site condition; site shape and size; topography; floodplains; and visible environmental issues/features. Based on this analysis, VA determined that there appeared to be sufficient potentially suitable locations for the proposed OPC and MHC within the delineated area.
- VA then advertised through a Solicitation for Offers for the development and lease of a new 70,849 NUSF, two-story, clinical building with 500 parking spaces within the delineated area (OPC). Separately, VA advertised through a Solicitation for Offers for the development and lease of a new 39,932 NUSF, one to two-story, clinical building with 300 parking spaces within the delineated area (MHC). In response to the solicitations, VA received offers within the competitive range for the proposed OPC developed at three sites (Sites 1 through 3) and MHC development at four sites (Sites 1 through 4). These sites are described in Section 2.3.2.

2.3.2 Evaluated Alternatives

Based on the described solicitation process and analysis, VA identified four reasonable sites (Sites 1 through 4) to establish the proposed OPC and MHC (the Action Alternative sites). The proposed OPC and MHC may be co-located or established on separate sites. Possible development scenarios for the four sites are:

- Site 1 – Both the OPC and the MHC, only the OPC, only the MHC, or no development.
- Site 2 – Both the OPC and the MHC, only the OPC, only the MHC, or no development.
- Site 3 – Only the OPC, only the MHC or no development.
- Site 4 – Only the MHC, or no development.

This EA examines in depth the implementation of the Proposed Action at one of the four Action Alternative sites (co-located OPC and MHC on Sites 1 or 2) or two of the four Action Alternative sites (separate OPC and MHC on Sites 1, 2, 3, and/or 4), and the No Action Alternative. The locations of the four Action Alternative sites are shown on Figure 1. The four Action Alternative sites include:

Site 1 (SW 34th Street between Williston Road and SW 56th Avenue): Site 1 includes approximately 17 acres of unimproved wooded land. Site 1 is southeast of the intersection of Williston Road and SW 34th Street and northeast of the intersection of SW 34th Street and SW 56th Avenue in an unincorporated area of Alachua County. Site 1 was unimproved pasture land prior to the 1990s and has gradually become reforested since the 1990s. Primary and secondary access to the OPC and MHC would be from SW 34th Street. If selected, the OPC would be located on the southern portion of Site 1 and/or the MHC would be located on the northern portion of Site 1. Site 1 is depicted on Figures 2 and 3.

Site 2 (NW 95th Boulevard): Site 2 includes approximately 18.6 acres of unimproved grassy land (northern and eastern portions), wooded land (majority of Site 2), two small wetlands in the southeastern portion, and an abandoned road (NW 95th Court) in the south-central portion. Site 2 is located on the north side of NW 95th Boulevard, just north of the Interstate 75/NW 39th Avenue interchange and west of NW 92 Court, in an unincorporated area of Alachua County. Site 2 was mostly unimproved farmland from at least the 1800s to the early 2000s with two to five small buildings, likely residences and/or agricultural buildings, in the central portion of the site from approximately 1940 until approximately 2006. Since the early 2000s, the majority of Site 2 has gradually become reforested, while the northern and eastern portions continued to be farmed or maintained until the early 2010s and have been vacant grassy land since the early 2010s. Primary and secondary access to the OPC and MHC would be from a proposed road adjoining to the north of Site 2. If selected, the OPC would be located on the western portion of Site 2 and/or the MHC would be located on the eastern portion of Site 2, north of the wetlands. Site 2 is depicted on Figures 4 and 5.

Site 3 (2100 NW 53rd Avenue): Site 3 includes approximately 8 acres of unimproved wooded land. Site 3 is located at the northwest corner of the intersection of NW 53rd Avenue and northwest

of NW 55th Avenue, within the City of Gainesville. Site 3 was wooded land from at least the 1930s to the 1950s, was cleared of trees in the 1950s, and has gradually become reforested since the 1950s. Primary access to the OPC or MHC would be from NW 53rd Avenue. Secondary access would be from NW 55th Boulevard. Site 3 is depicted on Figures 6 and 7.

Site 4 (SW 24th Avenue): Site 4 includes approximately 8.5 acres of unimproved wooded and grassy land. Site 4 is located southeast of the intersection of SW 24th Avenue and SW 75th Street/Tower Road in an unincorporated area of Alachua County. Site 4 was mostly wooded land from at least the 1930s until approximately 2007, when the eastern portion of the site was mostly cleared of trees. A dirt road and small structure (possible residence) appears to have been present within the woods in the southern portion of the site from approximately 1988 until the early 2000s. Access to the MHC would be from SW 24th Avenue and SW 75th Street. Site 4 is depicted on Figures 8 and 9.

No detailed design plans for the proposed OPC and MHC are currently available as these projects would be executed as build-to-suit leases. The VA developer (lessor) would be responsible to design and construct the facilities, in compliance with VA design requirements and applicable federal, state, and local regulations. The OPC would be a two-story, approximately 70,849 NUSF structure with surrounding paved, surface-level parking lots (total of approximately 500 parking spaces). The MHC would be a one to two-story, approximately 39,932 NUSF structure with surrounding paved, surface-level parking lots (total of approximately 300 parking spaces). The majority of the selected site(s) would be developed or altered to accommodate the proposed OPC and MHC developments. No substantial cutting or filling is anticipated, other than for general site leveling and stormwater detention. The VA design requirements specify that the OPC and MHC developments must meet a minimum rating of two Green Globes for new construction and sustainable interiors and the buildings are required to earn an Energy Star label. These VA contract design requirements ensure that the OPC and MHC would be sustainably developed. The facilities would be leased and operated by VA.

VA anticipates construction of the proposed OPC and MHC would begin in 2020 and the new facilities would open in 2022. The new OPC and MHC would provide primary care and mental health care outpatient services to the area's Veterans. Primary care services currently provided by the Gainesville VAMC would be relocated to the new OPC, allowing VA to decompress other operations at the VAMC. Mental health care services provided by the two existing small leased facilities would be relocated and consolidated at the new MHC. VA would no longer lease or operate these facilities once the proposed MHC is open and the existing leases expire.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. VA would continue to provide primary care outpatient services at the overcrowded and space-constrained Gainesville VAMC and mental health services at the two small VA-leased facilities in the area. The Action Alternative sites likely would remain vacant in the near future and ultimately be developed by others for other commercial use or residential use (Site 3), in accordance with local zoning. This alternative would limit VA's ability to provide necessary health care services to U.S. Veterans in the region, and would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was retained to provide a comparative baseline analysis as required under the CEQ regulations.

2.3.3 Alternatives Eliminated From Further Consideration

As described in Section 2.3.1, VA eliminated alternative sites through the screening process. Each of the offered sites, with the exception of the four Action Alternative sites, failed to meet the required screening criteria or was not within the competitive range.

VA considered modification or renovation of the Gainesville VAMC; however, it is space constrained and cannot not be reconfigured or expanded beyond its current size. Modification or renovation of the two existing mental health clinics in the Gainesville area is also not a viable option, as these leased facilities cannot be expanded beyond their current sizes.

VA considered building new VA-owned facilities in the Gainesville area; however, new VA-owned facilities would limit VA's ability to relocate services in the future and adapt to changes in Veterans health care needs and demographics. VA-owned facilities would also require land acquisition and construction, increasing the cost and lengthening the implementation timeline.

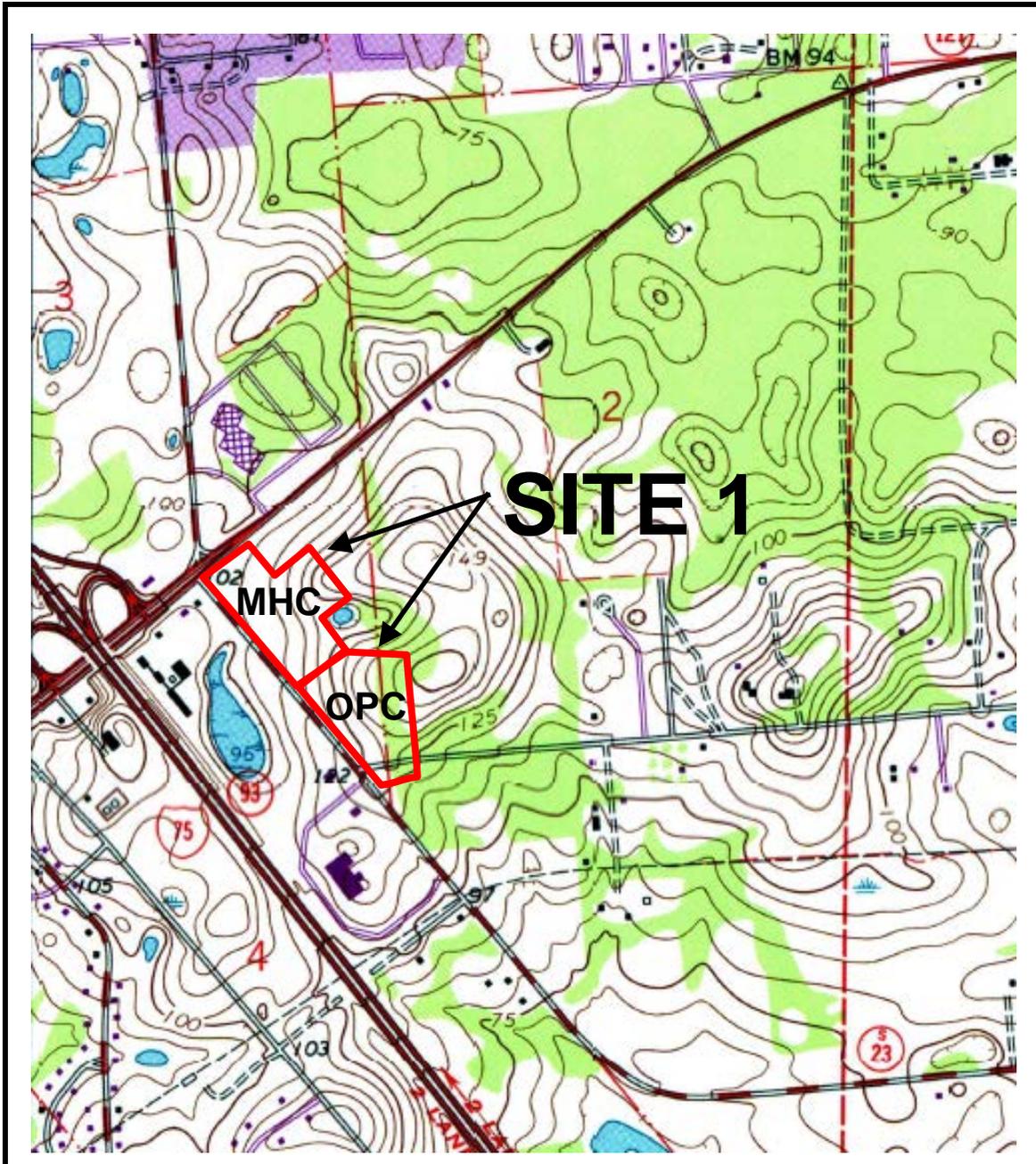
VA considered the renovation of another VA-owned vacant or underutilized facility; however, local VA planners determined no other available VA-owned facilities, suitable for renovation, are located in the Gainesville area.

VA also considered contracting out all primary care and mental health care outpatient services to private health care providers in the community. However, this alternative is not cost-effective and would not guarantee clear access and consistent standard and continuity of care. There also may not be sufficient, qualified, private-sector providers in the Gainesville area to accommodate the Veteran population.

VA considered the acquisition of existing facilities in the Gainesville area through purchase; however, market research and interviews with local VA planners indicated that suitable facilities for possible acquisition and subsequent renovation that would meet all project requirements does not exist in the delineated market area of the proposed OPC and MHC.

VA also considered collaboration with the Department of Defense (DoD) for a Joint Lease Project; however, according to local VA planners and VHA's Office of Interagency Health Affairs – Office of VA-DoD Coordination, there are currently no facility sharing opportunities in the Gainesville area. The nearest DoD medical facilities are at Naval Hospital Jacksonville in Jacksonville, Florida, and Mayport Naval Clinic, located in Mayport, Florida. These facilities are located approximately 70 and 90 miles away from the delineated area, respectively.

For the reasons stated above, these other alternatives were eliminated from further consideration.



**FIGURE 2
SITE 1
TOPOGRAPHIC MAP**

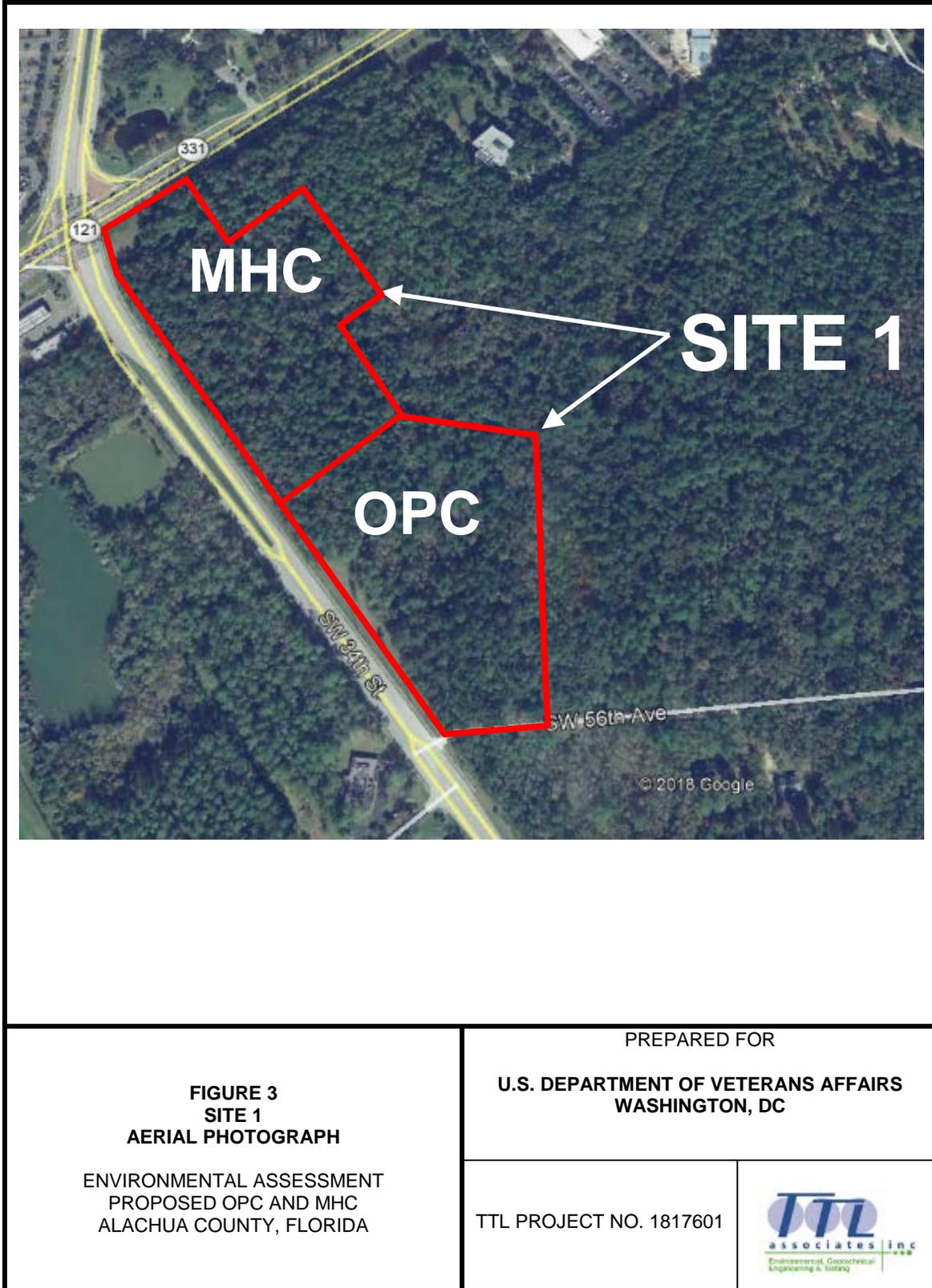
ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

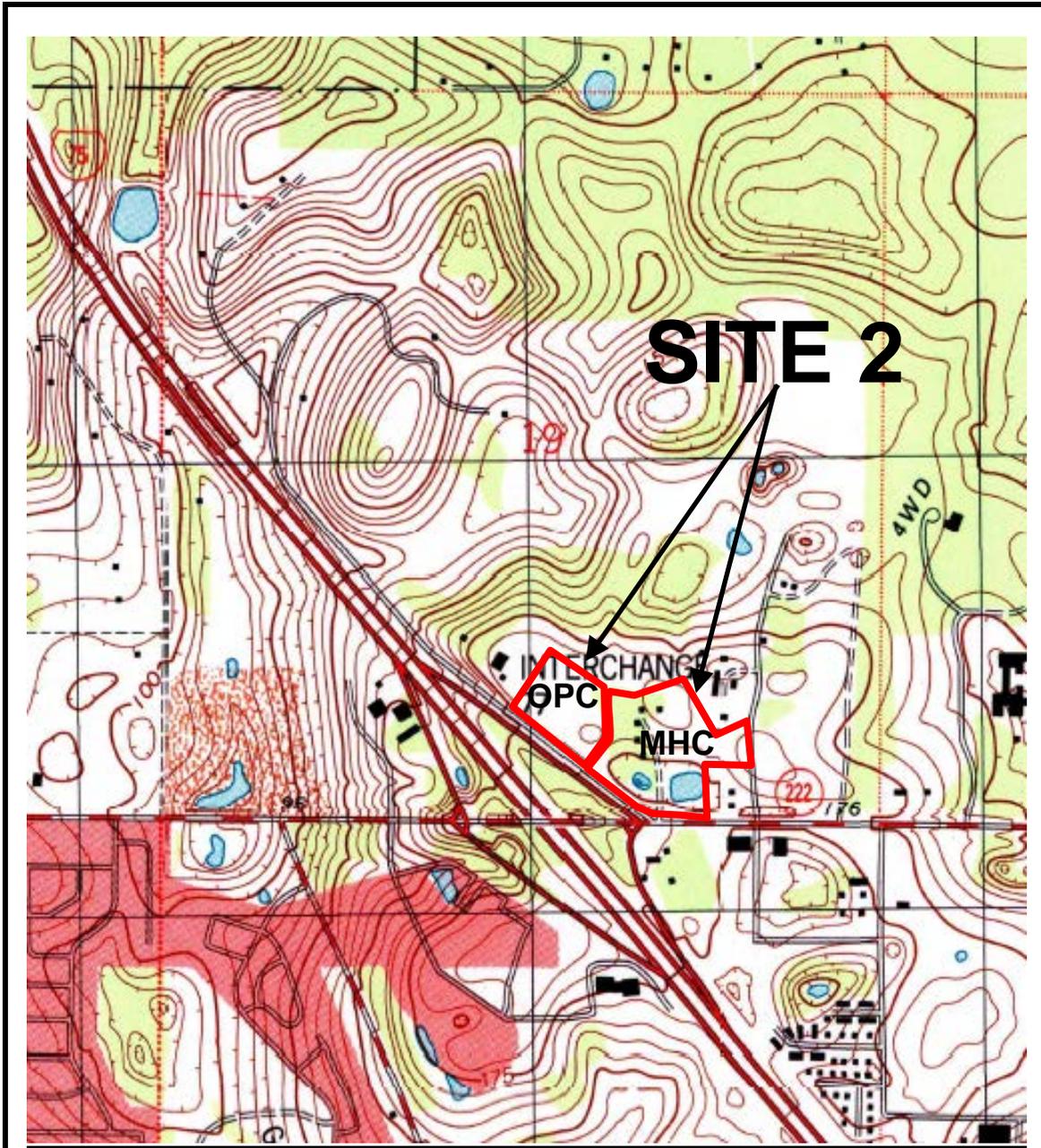
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**FIGURE 4
SITE 2
TOPOGRAPHIC MAP**

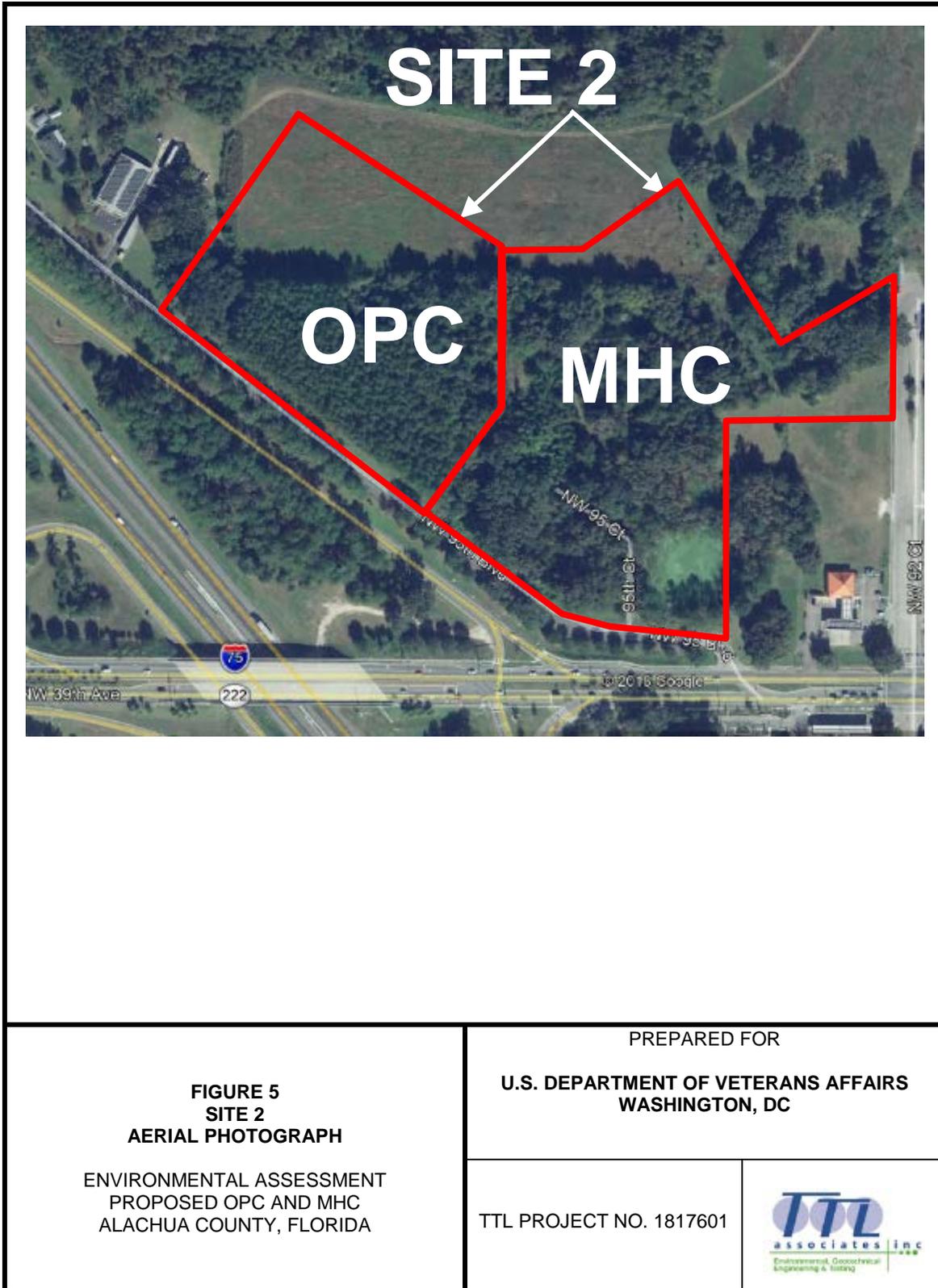
ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

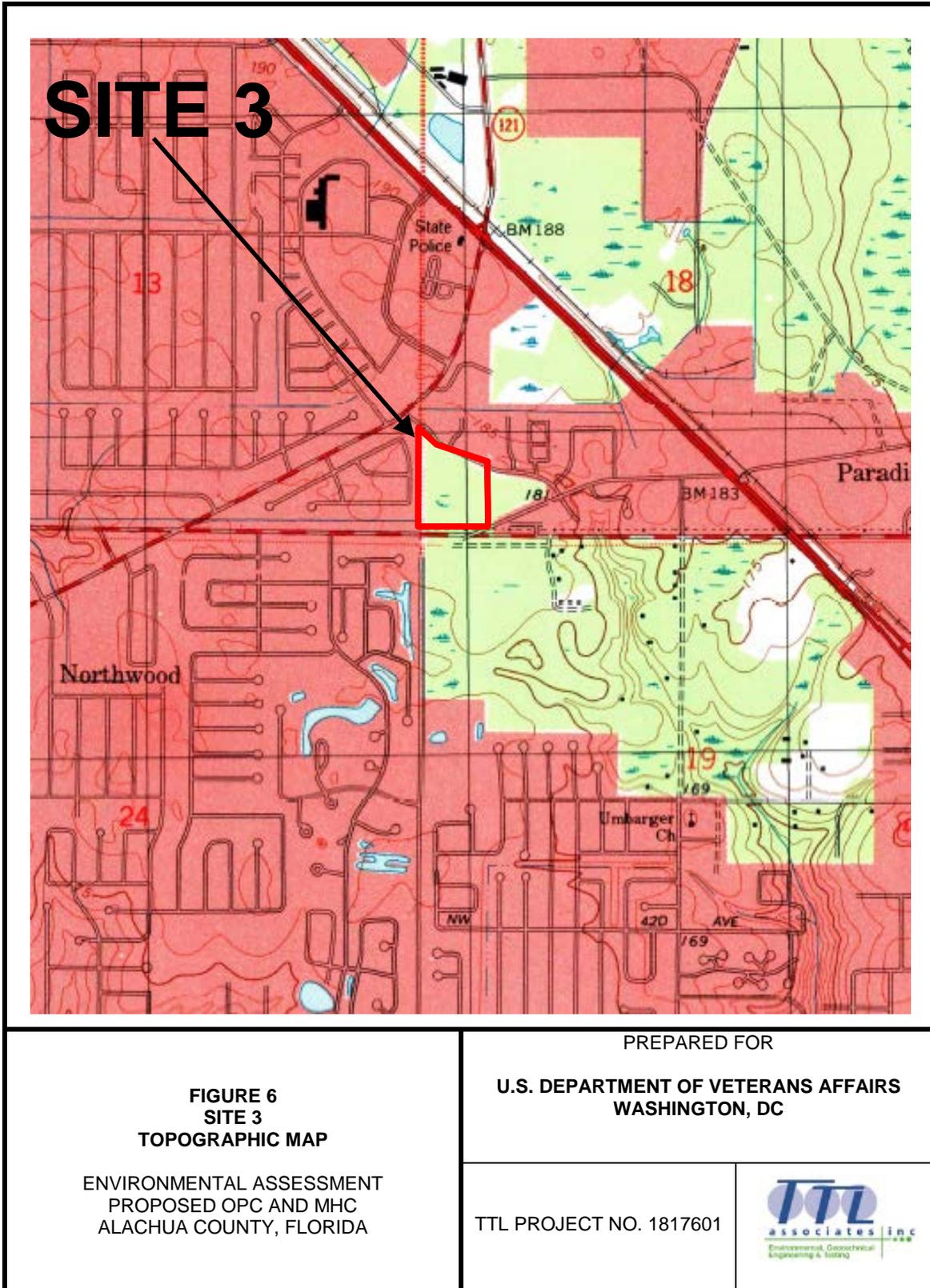
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WASHINGTON, DC

TTL PROJECT NO. 1817601









**FIGURE 7
SITE 3
AERIAL PHOTOGRAPH**

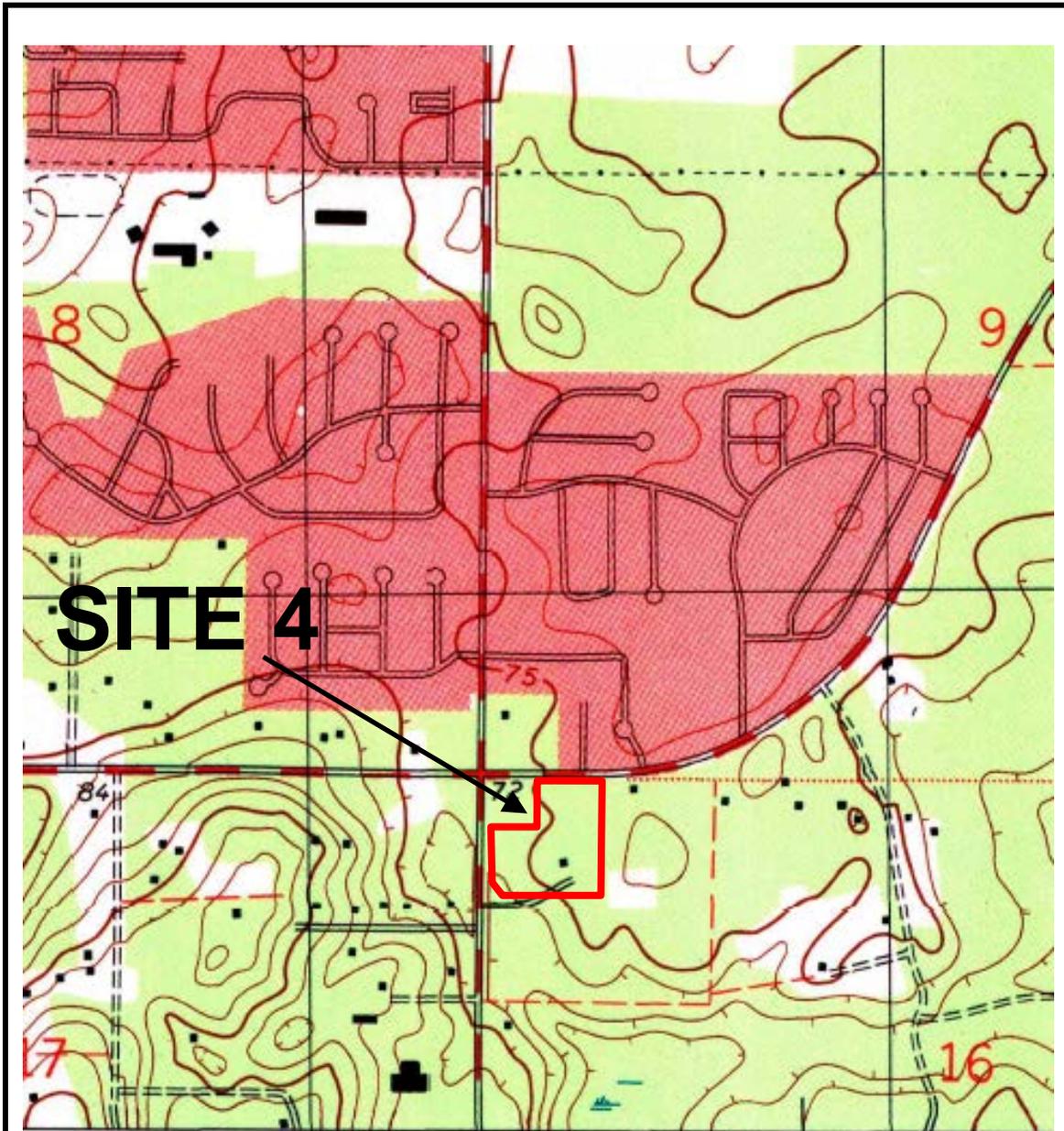
ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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WASHINGTON, DC**

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<p>FIGURE 8 SITE 4 TOPOGRAPHIC MAP</p> <p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>PREPARED FOR</p> <p>U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>
	<p>TTL PROJECT NO. 1817601</p> 



**FIGURE 9
SITE 4
AERIAL PHOTOGRAPH**

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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WASHINGTON, DC**

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SECTION 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) environmental, cultural, and socioeconomic conditions at the four Action Alternative sites (see Figures 1 through 9) and their general vicinities (that is, the Proposed Action's Region of Influence (ROI), with emphasis on those resources potentially impacted by the Proposed Action. Appendix C provides photographs, with captions, of the Action Alternatives sites and their vicinities. Under each resource area (Sections 3.2 through 3.16), the potential direct and indirect effects of implementing the Proposed Action at the four Action Alternative sites and the No Action Alternative are identified. Potential cumulative impacts are discussed in Section 3.17.

In this EA, impacts are identified as either significant, less than significant (that is, impacts that would not be of the context or intensity to be considered significant under the CEQ regulations), or no/negligible impact. As used in this EA, the terms "effects" and "impacts" are synonymous. Where appropriate and clearly discernible, each impact is identified as either adverse or beneficial.

The CEQ regulations specify that in determining the significance of effects, consideration must be given to both "*context*" and "*intensity*" (40 CFR 1508.27):

Context refers to the significance of an effect to society as a whole (human and national), to an affected region, to affected interests, or to just the locality. Significance varies with the setting of the Proposed Action.

Intensity refers to the magnitude or severity of the effect and whether it is beneficial or adverse.

In this EA, the significance of potential direct, indirect, and cumulative effects has been determined through a systematic evaluation of each considered alternative in terms of its effects on each individual environmental resource component.

Resource areas considered in this EA are as follows:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid Waste and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

3.2 Aesthetics

Site 1

Site 1 is located in a mixed use (commercial and vacant land), developing suburban area approximately 4.25 miles southwest of the center of the City of Gainesville (see Figures 1 and 2). Site 1 includes approximately 17 acres of unimproved wooded land located southeast of the intersection of SW 34th Street and SW Williston Road, and northeast of the intersection of SW 34th Street and SW 56th Avenue, in an unincorporated area of Alachua County. Site 1 is depicted on Figure 3.

Adjacent to the north of Site 1 across SW Williston Road is a Nationwide Insurance office building. Adjacent to the east of Site 1 are unimproved wooded lands, including a wetland. Adjacent to the south of Site 1, across SW 56th Avenue, is unimproved wooded land. SW 56th Avenue is a designated Scenic Road. Adjacent to the west and northwest of Site 1 (across SW 34th Street) are wooded lands, a retention pond, two gasoline stations, a McDonald's restaurant, a retail plaza, and an office building complex. Interstate 75 is located approximately 800 feet west of Site 1.

Site 2

Site 2 is located in a mixed use (commercial and vacant land), developing, suburban area approximately 7.75 miles west-northwest of the center of the City of Gainesville (see Figures 1 and 4). Site 2 includes approximately 18.6 acres of unimproved grassy land (northern and eastern portions), wooded land (majority of Site 2), two small wetlands in the southeastern portion, and an abandoned road (NW 95th Court) in the south-central portion. Site 2 is located on the north side of NW 95th Boulevard, just north of the Interstate 75/NW 39th Avenue interchange and west of NW 92 Court, in an unincorporated area of Alachua County. Site 2 is depicted on Figure 5.

Adjacent to the north of the Site 2 is unimproved grassy and wooded land. Adjacent to the east of the Site 2 are unimproved grassy and wooded land, a gasoline station, and across NW 92nd Court are unimproved grassy and wooded land and a McDonald's restaurant. Adjacent to the south of Site 2 across NW 95th Boulevard are wooded land and an entrance ramp to northbound Interstate 75. Adjacent to the west of Site 2 is unimproved grassy and wooded land, and Gleim Publications, Inc.

Site 3

Site 3 is located in a mixed use (residential and commercial), mostly developed suburban area approximately four miles northwest of the center of the City of Gainesville (see Figures 1 and 6). Site 3 includes approximately 8 acres of unimproved wooded land and is located at the northwest corner of the intersection of NW 53rd Avenue and northwest of NW 55th Avenue, within the City of Gainesville. Site 3 is depicted on Figure 7.

Adjacent to the north, south, and west of the Site 3 are single-family residential properties. Adjacent to the east of Site 3 is Peaceful Paths (a women's shelter).

Site 4

Site 4 is located in a mixed use (residential and commercial) suburban area approximately six miles west-southwest of the center of the City of Gainesville (see Figures 1 and 8). Site 4 includes approximately 8.5 acres of unimproved wooded and grassy land. Site 4 is located southeast of the intersection of SW 24th Avenue and SW 75th Street/Tower Road in an unincorporated area of Alachua County. Site 4 is depicted on Figure 9.

Adjacent to the north of Site 4 across SW 24th Avenue are residential properties and a CVS/pharmacy drug store. Adjacent to the east of Site 4 is Woodlands Care Center (senior care facility/nursing home). Adjacent to the south of Site 4 is a residential apartment community. Adjacent to the west of the Site 4 is a Walgreens drug store and, across SW 75th Street, is the Tower 24 Shopping Center.

3.2.1 Effects of the Action Alternatives

VA's closure of the two existing Gainesville mental health clinics, leased facilities owned by others, would have no aesthetics impacts. These facilities would likely be leased by others for another commercial use.

Site 1

The Proposed Action at Site 1 would result in less-than-significant aesthetic impacts. Site 1 is located in a developing area of mostly commercial properties and undeveloped wooded land. The new OPC and MHC would be attractive one to two-story medical office buildings that would be designed and constructed in a way that is visually consistent with the development of the surrounding area, and built in accordance with the Alachua County Unified Land Development Code (ACULDC). Existing on-site green space would be reduced and views from the surrounding areas would be altered by the OPC and MHC developments. However, visual effects would be minimized through attractive OPC and MHC designs and landscaping. Site 1 is located within Alachua County's Idylwild-Serenola Special Study Area (ISSSA), which has special land development requirements designed to preserve natural areas during development. The developer has stated they would comply with these development standards, which would further reduce aesthetic impacts.

Alachua County protects its designated Scenic Roads by restricting development within 100 feet of the associated ROW. The OPC and MHC developments would be designed in accordance with these standards. As a result, aesthetic impacts on SW 56th Avenue, a designated Scenic Road, would be less than significant.

Site 2

The Proposed Action at Site 2 would result in negligible aesthetic impacts. Site 2 is located in a developing area of mostly commercial properties and undeveloped grassy and wooded land and is located within the planned 390-acre Spring Hills Transit Oriented and Traditional Neighborhood (TND/TOD) development area. The new OPC and MHC would be attractive one to two-story medical office buildings that would be designed and constructed in a way that is visually consistent with the development of the surrounding area, and built in accordance with the ACULDC. Wetlands located in the southeastern portion of the site and associated buffers would not be

developed. Existing on-site green space would be reduced and views from the surrounding areas would be altered by the OPC and MHC developments. However, no sensitive viewshed receptors are located in the Site 2 area and visual effects would be minimized through attractive OPC and MHC designs and landscaping.

Site 3

The Proposed Action at Site 3 would result in less-than-significant aesthetic impacts. Site 3 is located in a mostly developed area and is surrounded by residential properties. The new OPC or MHC would be an attractive one or two-story medical office building that would be designed and constructed in a way that is visually consistent with the development of the general site area, and built in accordance with the City of Gainesville Code of Ordinances (GCO). Existing on-site green space would be mostly eliminated and views from the surrounding areas would be altered by the OPC or MHC development. However, visual effects on sensitive receptors adjacent to Site 3 (surrounding residential areas) would be minimized through an attractive OPC or MHC design and landscaping.

Site 4

The Proposed Action at Site 4 would result in less-than-significant aesthetic impacts. Site 4 is located in a mostly developed area and is surrounded by commercial and residential properties. The new MHC would be an attractive one or two-story medical office building that would be designed and constructed in a way that is visually consistent with the mixed-use development of the surrounding area, and built in accordance with the ACULDC. Existing on-site green space would be mostly eliminated and views from the surrounding areas would be altered by the MHC development. However, visual effects on sensitive receptors adjacent to Site 4 (adjacent residential areas) would be minimized through an attractive MHC design and landscaping.

3.2.2 Effects of the No Action Alternative

Under the No Action Alternative, no aesthetics impacts by VA would result. The Action Alternative sites would likely be developed for commercial use or residential use (Site 3) by others, consistent with local zoning. Aesthetics impacts similar to those associated with the Proposed Action could occur, depending on the use of the sites.

3.3 Air Quality

3.3.1 Ambient Air Quality

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act (CAA) requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the following principal pollutants, called "criteria pollutants" (as listed under Section 108 of the CAA):

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO_x)

- Ozone (O₃)
- Particulate matter (PM), divided into two size classes:
 - Aerodynamic size less than or equal to 10 micrometers (PM₁₀)
 - Aerodynamic size less than or equal to 2.5 micrometers (PM_{2.5})
- Sulfur dioxide (SO₂)

Areas are designated by the USEPA as “attainment”, “non-attainment”, “maintenance”, or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. In areas where the applicable NAAQS are not being met, a “non-attainment” status is designated. Areas that have been classified as “non-attainment”, but are now in compliance can be re-designated “maintenance” status if the state completes an air quality planning process for the area. Areas for which no monitoring data is available are designated as “unclassified”, and are by default considered to be in attainment of the NAAQS. According to the USEPA Green Book, Alachua County is currently designated as a full-attainment area.

3.3.2 Sensitive Receptors

Sensitive air quality receptors in the vicinity of Action Alternative sites include the residential areas surrounding Sites 3 and the senior care facility/nursing home and residential areas adjacent to Site 4. No sensitive air quality receptors were identified in the vicinity of Sites 1 and 2.

3.3.3 Effects of the Action Alternatives

Air emissions generated from the Proposed Action would have less-than-significant direct and indirect, short-term and long-term adverse impacts to the existing air quality environment around the selected Action Alternative site(s). Impacts would include short-term and long-term increased air emission levels as a result of: 1) construction activities, and 2) operation of the proposed OPC and MHC and onsite activities.

Construction activities would be performed in accordance with federal and state air quality requirements. Construction-related emissions are generally short-term, but may still have adverse impacts on air quality, primarily due to the production of dust. Dust can result from a variety of activities, including excavation, grading, and vehicle travel on paved and unpaved surfaces. Dust from construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Implementing dust control measures (BMPs) significantly reduces dust emissions from construction. Construction-related emissions also include the exhaust from the operation of construction equipment, including diesel particulate matter (DPM). The use of newer construction equipment with emissions controls and minimizing the time that the equipment is idling (BMPs) reduces construction equipment exhaust emissions. Implementation of BMPs, discussed in Section 5, would minimize these anticipated less-than-significant adverse, short-term construction-related, air quality impacts.

Operational (long-term) air quality impacts from the OPC and MHC would include emissions from equipment, such as boilers and generators, and vehicle emissions from patients and staff driving to and from the OPC and MHC. The proposed OPC would have daily site visits by approximately 500 staff, patients, volunteers, and other guests. The proposed MHC would have daily visits by approximately 300 staff, patients, volunteers, and other guests. As such, there would be a

localized, less-than-significant increase in vehicle air emissions at the selected Action Alternative site(s). However, regional vehicle emissions would be similar to current emissions as most patients and staff that would use the proposed OPC and MHC currently travel to the existing Gainesville VAMC and two leased Gainesville area mental health facilities.

A Title V operating permit is not anticipated to be required for the proposed OPC's or MHC's boiler equipment, generators, and other equipment as this equipment is not anticipated to emit more than 100 tpy of any individual or combination of hazardous air pollutants. However, VA's selected developer(s) would secure any required air emissions permits from FDEP and ACEPD.

VA's closure of the existing leased mental health clinics would have negligible air quality effects. These facilities would likely be leased by others for commercial use with similar operational air emissions.

3.3.4 Effects of the No Action Alternative

Under the No Action Alternative, no air quality impacts related to construction or operation of the proposed OPC and MHC would result. Should the Action Alternative sites ultimately be developed for use by others, potential for air quality impacts could result, depending upon the future use.

3.4 Cultural Resources

Site 1

Site 1 is currently unimproved wooded land. Site 1 was unimproved pasture land prior to the 1990s and has gradually become reforested since the 1990s. Site 1 is not listed on the National Register of Historic Properties (NRHP). Row 10 Historic Preservation Solutions (Row 10) prepared an Initial Cultural Resources Impact Prediction (ICRIP) report for Site 1 in April 2019 (Row 10 2019c). No historic buildings or structures were identified at the site. The Florida Master Site File listed no archaeological sites at Site 1. No historic properties eligible for listing in the NRHP were identified at the site or surrounding properties.

The Florida Division of Historical Resources (Florida State Historic Preservation Office or SHPO) indicated that the project area for Site 1 has never been surveyed for archaeological and historic sites and conditions in the area are favorable for the presence of these kinds of resources. Florida SHPO recommended that Site 1 be subjected to a professional cultural resources assessment survey (Florida SHPO 2019).

Archaeological investigation of Site 1 is being conducted as recommended by Florida SHPO.

Site 2

Site 2 includes approximately 18.6 acres of unimproved grassy land (northern and eastern portions), wooded land (majority of Site 2), two small wetlands in the southeastern portion, and an abandoned road (NW 95th Court) in the south-central portion. Site 2 was mostly unimproved farmland from at least the 1800s to the early 2000s with two to five small buildings, likely residences and/or agricultural buildings, in the central portion of Site from approximately 1940 until approximately 2006. Since the early 2000s, the majority of Site 2 has gradually become reforested, while the northern and eastern portions continued to be farmed or maintained until the

early 2010s and have been vacant grassy land since the early 2010s. Site 2 is not listed on the NRHP. Row 10 completed an ICRIP report for Site 2 in April 2019 (Row 10 2019a). No historic structures or buildings were identified at the site. Florida Master Site Files list one archaeological site on the eastern portion of Site 2 that was determined not to be eligible for listing on the NRHP by the Florida SHPO. No historic properties eligible for listing in the NRHP were identified at the site or surrounding properties.

The Florida SHPO stated the project area for Site 2 was previously surveyed for archaeological and historic sites. No additional cultural resources assessment survey of Site 2 was recommended by Florida SHPO; however, Florida SHPO stated that measures should be taken to address unexpected finds during construction if the Proposed Action is implemented at Site 2 (Florida SHPO 2019).

Site 3

Site 3 includes approximately 8 acres of unimproved wooded land. Site 3 was wooded land from at least the 1930s to the 1950s, was cleared of trees in the 1950s, and has gradually become reforested since the 1950s. Site 3 is not listed in the NRHP. Row 10 completed an ICRIP of Site 3 in April 2019 (Row 10 2019b). No historic buildings or structures were identified at the site. The Florida State Master File listed no archaeological sites at Site 3. No historic properties eligible for listing in the NRHP were identified at the site or surrounding properties.

The Florida SHPO indicated the project area for Site 3 has never been surveyed for archaeological and historic sites and conditions in the area are favorable for the presence of these kinds of resources. Florida SHPO recommended that Site 3 be subjected to a professional cultural resources assessment survey (Florida SHPO 2019).

Archaeological investigation of Site 3 is being conducted as recommended by Florida SHPO.

Site 4

Site 4 includes approximately 8.5 acres of unimproved wooded and grassy land. Site 4 was mostly wooded land from at least the 1930s until approximately 2007, when the eastern portion of the site was mostly cleared of trees. A dirt road and small structure (possible residence) appears to have been present within the woods in the southern portion of the site from approximately 1988 until the early 2000s. Site 4 is not listed on the NRHP. Row 10 completed an ICRIP of Site 4 in April 2019 (Row 10 2019d). No historic buildings or structures were identified at the site.

A Desktop Review of Site 4 was prepared by Wiregrass Archaeological Consulting in December 2018. The Desktop Review indicated archaeological surveys have been completed in the area of Site 4 and numerous artifacts were identified. One of the identified archaeological sites extended onto the southern and eastern portions of Site 4, but was determined to be ineligible for listing on the NRHP. However, only a portion of Site 4 had been assessed and it was considered likely that additional artifacts were present in the unsurveyed areas.

Archaeological investigation of Site 4 is being conducted.

3.4.1 Effects of the Action Alternatives

Based on the findings of the ICRIP for Site 2, the implementation of the Proposed Action at Site 2 would not affect NRHP-listed or eligible cultural resources. The SHPO concurred with this determination in June 2019. Cultural resources impacts of Site 2 would be negligible.

Based on the findings of the ICRIPs and other available information for Sites 1, 3, and 4, no historic properties listed on the NRHP or eligible for listing on the NRHP are known to be present at these sites or would be impacted by the Proposed Action. However, each of these sites is located in an area that may contain archaeological resources and the sites have not been fully assessed for these resources. Archaeological investigations of these sites are being conducted. The results of these investigations will be provided to Florida SHPO. If archaeological resources eligible for listing on the NRHP are identified at the selected site(s) that could be impacted by the proposed OPC and MHC developments, VA would enter into a Memorandum of Agreement (MOA) under Section 106 of the National Historic Preservation Act (NHPA) with the Florida SHPO, the Advisory Council on Historic Preservation (ACHP), and other interested consulting parties to mitigate the adverse effects. Mitigation measures may include avoidance of the archaeological resources during site design, further exploration for data inventory and recovery, and/or archaeological monitoring during excavation work associated with the OPC and MHC construction. With the completion of these NHPA mitigation measures, if necessary, cultural resources impacts would be less than significant.

VA's closure of the existing leased mental health clinics would have no cultural resources impacts.

3.4.2 Effects of the No Action Alternative

Under the No Action Alternative, no cultural resources impacts related to construction by VA would occur. Should the Action Alternative sites be developed by others, cultural resources impacts could result.

3.5 Geology and Soils

According to *A Tapestry of Time and Terrain* (USGS 2000), the Action Alternative sites are located within the Floridian physiographic section of the Coastal Plain physiographic province of the Atlantic Plains physiographic region. The Coastal Plain is composed of undeformed sedimentary rock layers whose ages range from the Late Cretaceous to the present Holocene sediments of the coast. Large portions of Alachua County are underlain by the Ocala Limestone formation, consisting of nearly pure limestone and occasional dolostones. The Ocala Limestone is at or near the surface within the Ocala Karst District and exhibits extreme karstification.

Karstification is the chemical dissolution process by water in limestone and similar carbonate rocks (creation of cavities due to dissolving rock). Karstification can result in fissures, sinkholes, underground streams, and caverns. According to the Alachua County Map Genius internet application, the western half of Alachua County, including the areas around the Action Alternative sites, is largely designated as being within Sensitive Karst Areas, areas with a high vulnerability to the Floridan Aquifer and the presence of well drained soils.

Site 1

The Micanopy, Florida USGS Topographic Quadrangle (dated 1988) indicated that surficial topography of Site 1 slopes slightly to the west with elevations ranging from approximately 130 feet to 140 feet above mean sea level (amsl) along the eastern boundary to approximately 105 feet amsl in the northwestern corner. The nearest surface water bodies depicted on the topographic map are a small pond located adjoining to the east of Site 1 and a pond located approximately 400 feet west of Site 1 across SW 34th Street. Figure 2 depicts the topography of Site 1 and the surrounding area.

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, Site 1 contains four soil types identified as Millhopper sand, 0 to 5 percent slope (northwestern corner); Blichton sand, 0 to 2 percent slopes (east-central portion); Blichton sand, 2 to 5 percent slopes (northern portion); and Bivans sand, 2 to 5 percent slopes (southern portion). Millhopper sand soils are characterized as moderately well drained sand, loamy, sand, and sandy clay loam. Blichton and Bivans sand soils are characterized by poorly drained sand, sandy clay, and sandy clay loam. Site 1 soils are shown on Figure 10.

According to the FDEP Florida Geological Survey (FGS), Site 1 is located in a region dominated by bare or thinly covered limestone with few generally shallow and broad sinkholes. The limestone bedrock surface is intensely karstified and the thin, overburden materials gradually settle into buried voids and cavities within the bedrock. No evidence of karst activity was identified on Site 1; however, the pond located adjoining to the east of Site 1 may represent a sinkhole. According to the Alachua County Map Genius internet application, Site 1 does not contain any designated karst-sensitive areas.

Site 2

The Gainesville West, Florida USGS Topographic Quadrangle (dated 1994) indicated that surficial topography of Site 2 is mostly level with slight slope to the south and an elevation of approximately between 165 feet and 170 feet amsl throughout most of Site 2, with a low-lying area in the southeastern portion, where two ponds are located. Other small ponds are located in the general area, but are at least 500 feet away from the site. Figure 4 depicts the topography of Site 2 and the surrounding area.

According to the USDA NRCS Web Soil Survey, Site 2 contains five soil types identified as Millhopper sand, 0 to 5 percent slopes (western and northeastern portions); Fort Meade fine sand, 0 to 5 percent slopes (northwestern corner); Millhopper-Urban land complex, 0 to 5 percent slopes (southern portion along NW 95th Boulevard); Lochloosa fine sand, 2 to 5 percent slopes (eastern portion); and Blichton sand, 5 to 8 percent slopes (south-central portion). Fort Meade fine sand and Millhopper sand soils are characterized as moderately to well drained sand, loamy sand, and sandy clay loam. The Lochloosa fine sand and Blichton sand soils are characterized as somewhat poorly to poorly drained sand, fine sand, fine sandy loam, and sandy clay loam. Site 2 soils are shown on Figure 11.

According to the FDEP FGS, Site 2 is located in a region dominated by cohesive clayey sediments with low permeability between 30 and 200 feet thick and numerous sinkholes. The limestone bedrock surface is intensely karstified and the thicker, overburden materials abruptly collapse into buried voids and cavities within the bedrock. The ponds located in the southeastern portion of

Site 2 are likely sinkholes. No other evidence of karst activity was identified at Site 2. Information provided by Alachua County indicates the northern portion of Site 2 is designated as a karst-sensitive area (Figure 12).

Site 3

A review of the Gainesville East, Florida USGS Topographic Quadrangle (dated 1994) indicated that surficial topography of Site 3 is level and at an elevation of approximately 180 feet amsl. The nearest surface water body depicted on the topographic map is a small wetland located on the western portion of Site 3. However, a wetland determination found that there are no wetlands at the site (see Section 3.10). No other surface waters are depicted within 500 feet of Site 3. Figure 6 depicts the topography of Site 3 and the surrounding area.

According to the USDA NRCS Web Soil Survey, Site 3 contains two soil types identified as Wauchula sand (majority of Site 3) and Riviera sand (northwestern corner Site 3). These soils are characterized by poorly drained sand and sandy loam. Site 3 soils are shown on Figure 13.

According to the FDEP FGS, Site 3 is located in a region dominated by cohesive clayey sediments with low permeability between 30 and 200 feet thick with numerous sinkholes. The limestone bedrock surface is intensely karstified and the thicker, overburden materials abruptly collapse into buried voids and cavities within the bedrock. No evidence of potential karst activity was identified at Site 3. According to Alachua County mapping, Site 3 is not located within a designated karst-sensitive area.

Site 4

The Gainesville West, Florida USGS Topographic Quadrangle (dated 1994) indicated that surficial topography of Site 4 slopes slightly to the west with elevations ranging from approximately 80 feet amsl in the eastern portion of the site to approximately 70 feet amsl near the southwestern corner of the site. No surface water bodies are depicted on Site 4 or within 500 feet of the site. Figure 8 depicts the topography of Site 4 and the surrounding area.

According to the USDA NRCS Web Soil Survey, Site 4 contains three soil types identified as Millhopper sand, 0 to 5 percent slopes (eastern portion); Bonneau fine sand, 2 to 5 percent slopes (southwestern and northern portions); and Jonesville-Cadillac-Bonneau complex, 0 to 5 percent slopes (central and northwestern portions). These soils are characterized by moderately well to well drained fine sand, sand, and sandy clay loam. Site 4 soils are shown on Figure 14.

According to the FDEP FGS, Site 4 is located in a region dominated by bare or thinly covered limestone with few generally shallow and broad sinkholes. The limestone bedrock surface is intensely karstified and the thin, overburden materials gradually settle into buried voids and cavities within the bedrock. No evidence of karst activity was identified at Site 4. According to the Alachua County Map Genius internet application, the central portion of Site 4 is classified as a karst-sensitive area (Figure 15).

3.5.1 Prime and Unique Agricultural Land Soils

Prime and unique farmlands are regulated in accordance with the Farmland Protection Policy Act (FPPA) (7 USC 4201, *et seq.*) to ensure preservation of agricultural lands that are of statewide or local importance. Soils designated as prime agricultural land are capable of producing high yields of various crops when managed using modern farming methods. Prime agricultural land is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion. Unique agricultural lands are also capable of sustaining high crop yields and have special combinations of favorable soil and climate characteristics that support specific high-value foods or crops.

According to the USDA NRCS Web Soil Survey, none of the soils at the Action Alternative sites are classified as prime farmland.

3.5.2 Effects of the Action Alternatives

No major changes to topography would occur at the selected Action Alternative site(s) due to the Proposed Action. The OPC and MHC would be designed in concert with the selected sites' current topography. All of the Action Alternative sites are generally level. Although some grading would be required, it is anticipated that the OPC and MHC buildings and parking areas would be constructed near current grades.

Less-than-significant impacts to geology are anticipated. No active significant faults are known extend through the subsurface geology at the Action Alternative sites. As such, no impacts associated with seismic hazards are identified. No mineral resource impacts are anticipated, as the Proposed Action would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, state, national, or global basis. In addition, the Proposed Action would not impact prime agricultural land.

The Action Alternative sites are located in an area where karst conditions and associated sinkholes are common. Possible karst conditions at the Action Alternative sites would require geotechnical exploration and may require geotechnical management measures. VA's selected developer(s) would complete a geotechnical investigation for the OPC and MHC developments that would include a karst survey of the selected site(s). Geotechnical recommendations would be incorporated into the OPC and MHC designs to ensure the stability of the development. In addition, the site design would include management measures to reduce any potential sinkhole development.

During construction, less-than-significant, direct and indirect, short-term soil erosion and sedimentation impacts would be possible as the selected site(s) are graded and proposed building, parking areas, entrance road, and other project components are constructed. Construction would remove the vegetative cover, disturb the soil surface, and compact the soil. The soil would then be susceptible to erosion by wind and surface runoff. Exposure of the soils during construction has the potential to result in increased sedimentation to stormwater management systems and offsite discharges of sediment-laden runoff. However, such potential adverse erosion and sedimentation effects would be prevented through utilization of appropriate BMPs (Section 5) and adherence to the terms of an approved FDEP-issued National Pollutant

Discharge Elimination System (NPDES) permit. In addition, stormwater management review by the St. John's River Water Management District (SJRWMD) would be required as part of any proposed onsite development activities. An Environmental Resources Permit (ERP) from the SJRWMD would be required to manage stormwater discharges associated with the proposed OPC and MHC. The ERP supersedes any NPDES permits; however, documentation of the ERP is required to be provided to the lead NPDES agency.

Once construction is complete, no long-term erosion and sedimentation impacts would be anticipated. No long-term soil erosion impacts would occur as a result of increased impervious surfaces onsite; these effects would be mitigated by including appropriately designed on-site stormwater management systems as part of final site design.

VA's closure of the existing leased mental health clinics would have no geology and soils impacts.

3.5.3 Effects of the No Action Alternative

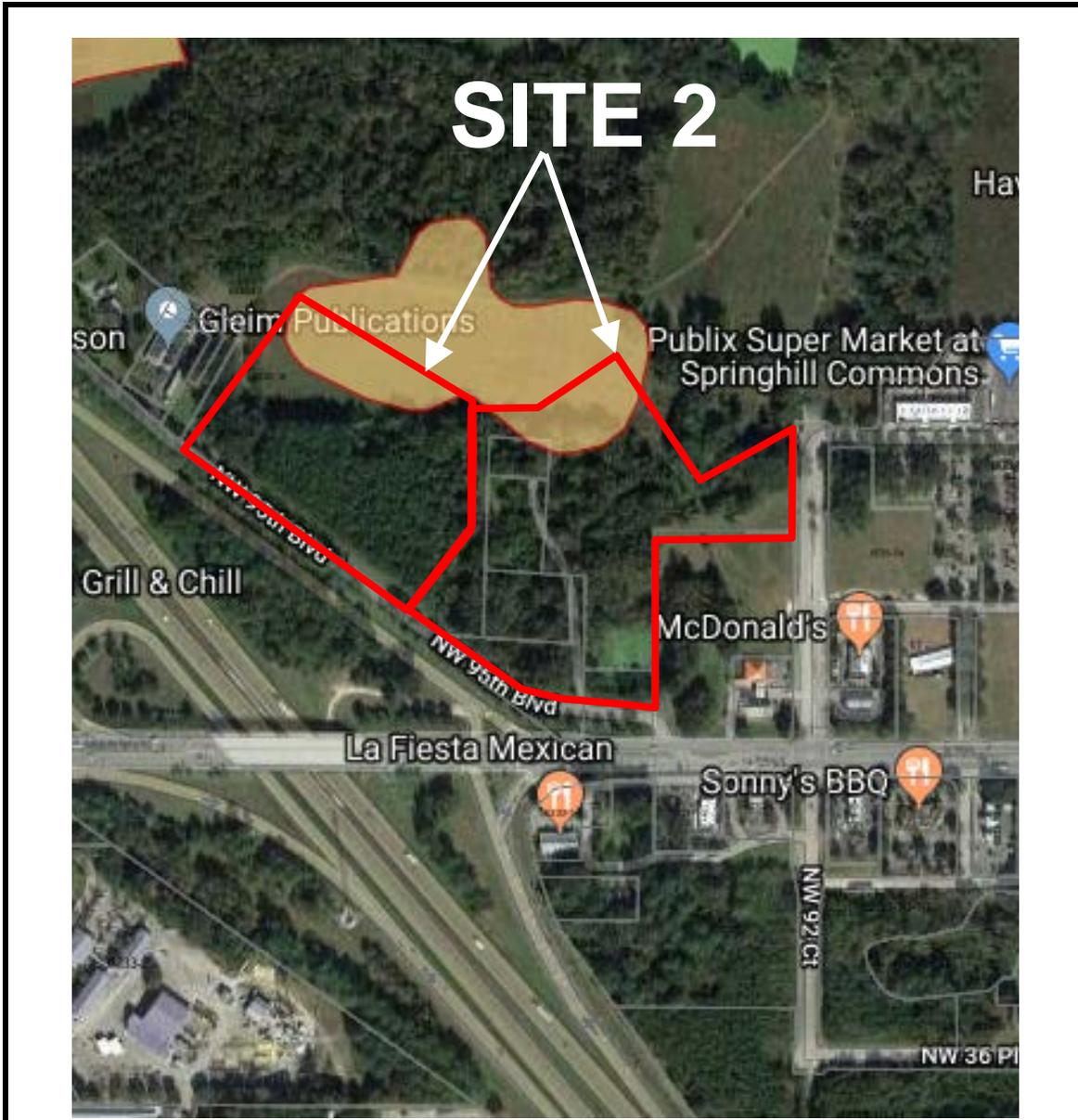
Under the No Action Alternative, no construction by VA's selected developer(s) would occur. No impacts to soils, topography, or geology would occur at the Action Alternative sites as a result of VA's actions. However, the Action Alternative sites would likely be developed by others for commercial use and impacts similar to those as identified above could occur.



<p>FIGURE 10 SITE 1 SOILS MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	



<p>FIGURE 11 SITE 2 SOILS MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	



<p>FIGURE 12 SITE 2 ALACHUA COUNTY SENSITIVE KARST AREAS MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	



**FIGURE 13
SITE 3
SOILS MAP**

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, DC

TTL PROJECT NO. 1817601





**FIGURE 14
SITE 4
SOILS MAP**

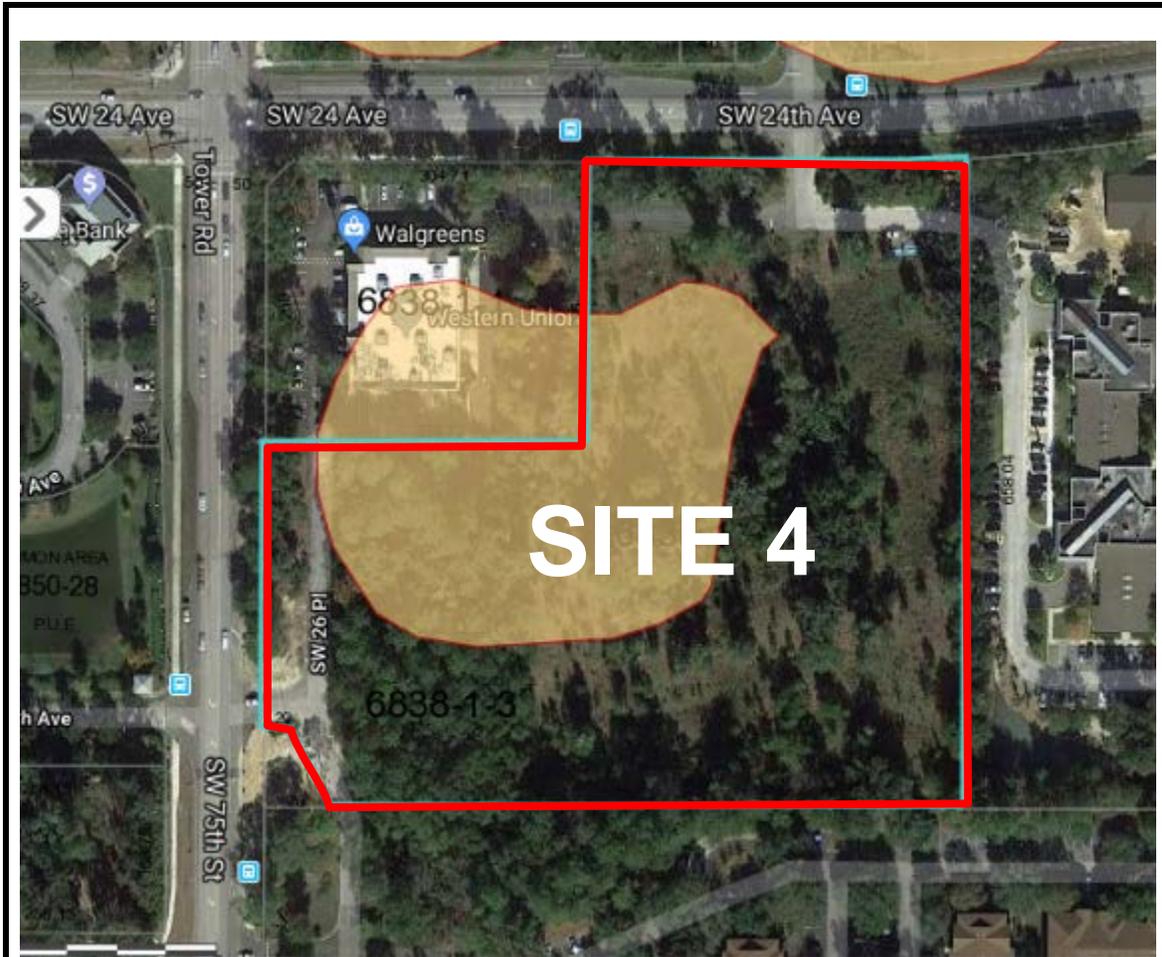
ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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**FIGURE 15
SITE 4
ALACHUA COUNTY
SENSITIVE KARST AREAS MAP**

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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3.6 Hydrology and Water Quality

3.6.1 Surface Waters

The Action Alternative sites are located in the Lower SJRWMD. No direct surface water connection is present between the Gainesville area and the St. John's River, which is located approximately 40 miles east of Gainesville; however, surface water gradually makes its way to the east towards the St. John's River through various wetland complexes, lakes, and connecting waterbodies.

Site 1

No surface water features were identified at Site 1. A natural pond, that appears to be associated with a sinkhole, is located adjoining to the east of Site 1 and a pond is located approximately 400 feet west of Site 1. In addition, a man-made stormwater retention pond is located west of the site, across SW 34th Street. No other surface waters were identified in the immediately adjacent areas to Site 1. Stormwater at Site 1 generally infiltrates into onsite soils or flows over ground towards the west.

Site 2

Two natural ponds are located in the southeastern portion of Site 2 that appear to be associated with sinkholes. No other surface water features were identified at Site 2 or in the immediately adjacent areas to Site 2. Other small ponds are located in the general area, but are located at least 500 feet away from the site. Stormwater at Site 2 generally infiltrates into onsite soils or flows over ground towards the south.

Site 3

A small wetland is depicted in the western portion of Site 3; however, a wetland determination found that there are no wetlands at the site. Refer to Section 3.10 for a discussion of wetlands on Site 3. No natural surface water features were identified at Site 3 or within 500 feet of Site 3. Stormwater at Site 3 generally infiltrates into onsite soils.

Site 4

No surface water features were identified at Site 4 or within 500 feet of Site 4. Stormwater at Site 4 generally infiltrates into onsite soils or flows over ground towards the southwest.

3.6.2 Groundwater

According to the Groundwater Atlas of the United States, the Floridan Aquifer is the principal aquifer in Florida and is comprised of a thick sequence of carbonate rocks (limestone and dolomite) of Tertiary age. In the Gainesville area, the Floridan Aquifer is thinly confined (upper confining unit is less than 100 feet thick) to fully confined (upper confining unit is greater than 100 feet thick). The Floridan Aquifer in the Gainesville area ranges from 1,400 feet to 1,600 feet in thickness.

No site-specific information pertaining to the groundwater conditions was identified for the Action Alternative sites. However, based on available information from the USGS Groundwater Resources Program and topographic maps, groundwater is likely to be found within 50 feet below grade at the Action Alternative sites.

The Alachua County Growth Management Division (ACGMD) stated that due to the sinkholes and sensitive karst areas at Sites 1, 2, and 4, the areas are listed as moderate aquifer recharge zones with a high vulnerable aquifer assessment ratings. ACGMD stated that Site 3 is listed as a moderate aquifer recharge zone with a lower vulnerability aquifer assessment rating (ACGMD 2019).

3.6.3 Effects of the Action Alternatives

The proposed OPC and MHC would be slab-on-grade buildings and serviced with municipal water supplies. Therefore, it is not anticipated that groundwater would be impacted by the Proposed Action. If shallow groundwater is encountered during construction, appropriate groundwater engineering controls would be utilized to ensure no adverse effects to groundwater. As such, impacts to groundwater are anticipated to be less than significant.

The Action Alternatives would not result in significant impacts to surface waters, provided that the BMPs described in Section 5 are implemented. These BMPs would control construction-related impacts of soil erosion and sedimentation and would provide proper stormwater management following the completion of the Proposed Action. Each site would include stormwater management in on-site retention ponds. The stormwater management systems would be designed and constructed in accordance with Florida Administrative Code (FAC), and ACULDA, GCO (Site 3), and SJRWMD requirements. Stormwater management systems at Sites 1, 2, and 4 would also meet the Sensitive Karst Area Hydrologic Basin criteria. Anticipated stormwater management for each site is described below.

Site 1

Stormwater from the proposed OPC and/or MHC development at Site 1 would be collected from the development areas and routed to two interconnected, long detention basins that would be constructed on the western portion of the site, along SW 34th Street. These ponds would discharge to a new retention pond that would be constructed at the northwestern corner of the site.

Site 2

Stormwater from the proposed OPC and/or MHC development at Site 2 would be collected from the development areas and routed to new retention basins that would be constructed in the southern and southeastern portions of the site. The retention basins would be located outside of the conservation management area that includes the two natural, sinkhole ponds/wetlands.

Site 3

Stormwater from the proposed OPC or MHC development at Site 3 would be conveyed to five small retention ponds that would be constructed near the northern and southern site boundaries.

Site 4

Stormwater from the proposed MHC development at Site 4 would be routed to two retention ponds that would be constructed in the northern portion of the site.

3.6.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA's selected developer(s) would occur. No impacts to water resources at the Action Alternative sites would occur as a result of the VA's actions. However, should the sites be developed for commercial or residential use by others, impacts similar to those as identified above could occur.

3.7 Wildlife and Habitat

3.7.1 Vegetation and Wildlife

Site 1

Site 1 includes approximately 17 acres of unimproved wooded land. The properties surrounding Site 1 consist of primarily unimproved wooded land with commercial development to the north and west. The vegetative communities on Site 1 could support wildlife species associated with partially developed suburban Gainesville areas.

ACGMD stated that Site 1 is occupied by a regenerated upland hardwood hammock with scattered pines and identified Site 1 as part of the ISSSA, which requires an evaluation for the presence of significant upland habitats and has specific land development requirements. TTL's reconnaissance of Site 1 indicated that the plant communities at Site 1 may fall into the significant upland habitat category of Mesic Hammock/Upland Mixed Forest and; therefore, the development of Site 1 may be required to meet the significant upland habitat criteria associated with the ISSSA. Nonresidential development within the ISSSA, such as the Proposed Action, must be designed so that the total mass of all buildings, parking and loading areas do not occupy in excess of 50 percent of significant upland habitats and the remainder of significant upland habitat must retain the existing undisturbed vegetation. ACGMD also noted that Site 1 contains several large trees that would require protection or mitigation, if removed.

ACGMD stated that Site 1 is located adjoining to the west of, but not within, the designated Serenola Forest Strategic Ecosystem and noted the adjoining proximity of the Serenola Forest Strategic Ecosystem could be a factor in the evaluation of where habitat protection may be designated to achieve the preservation requirements of the aforementioned ISSSA (ACGMD 2019). Refer to Figure 16.

Site 2

Site 2 includes approximately 18.6 acres of unimproved grassy land (northern and eastern portions), wooded land (majority of Site 2), two small wetlands in the southeastern portion, and an abandoned road (NW 95th Court) in the south-central portion. The properties surrounding Site 2 consist of a primarily unimproved grassy and wooded land with limited commercial development

to the west and east, and Interstate 75 to the southwest. The vegetative communities on Site 2 could support wildlife species associated with partially developed suburban Gainesville areas.

ACGMD stated that the identified wetlands and associated buffers located in the southeastern portion of Site 2 are designated as CMA associated with the 390-acre Springhills TND/TOD, which includes Site 2 (ACGMD 2019).

Site 3

Site 3 includes approximately 8 acres of unimproved wooded land (an established pine plantation). The properties surrounding Site 3 primarily consist of residential properties with some unimproved wooded land (north). The vegetative communities on Site 3 could support wildlife species associated with suburban Gainesville areas.

Site 4

Site 4 includes approximately 8.5 acres of unimproved wooded and grassy land. The area surrounding Site 4 consists primarily of residential and commercial properties. The vegetative communities on Site 4 could support wildlife species associated with suburban Gainesville areas.



FIGURE 16
SITE 1
ALACHUA COUNTY
STRATEGIC ECOSYSTEMS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

PREPARED FOR
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1817601



3.7.2 Threatened and Endangered Species

As part of the preparation of this EA, the USFWS and various state natural resources' agencies were contacted to identify any potential for the presence of state or federally listed species on or in the vicinity of the Action Alternative Sites.

According to the USFWS Information for Planning and Conservation (IPaC) internet application, one federally listed endangered species, four threatened species, one proposed threatened species, and one candidate species were identified for the vicinity of the Action Alternative sites. The same species were identified for all four Action Alternative site areas. The IPaC reports for the sites are provided in Appendix D. No critical habitats for protected species were identified on the Action Alternative sites. USFWS (USFWS 2019) stated that the Action Alternatives are not likely to adversely affect the resources protected by the Endangered Species Act (the IPaC identified species). Table 1 provides a summary of the federally protected species listed in the IPaC reports, their habitat requirements, and the potential presence of their required habitat at the Action Alternative sites.

Table 1. Federally Listed Species in the Vicinity of the Action Alternative Sites			
Species	Status	Habitat	Potential Habitat Present at the Sites
<i>Birds</i>			
Eastern black rail	Proposed Threatened	Slat, brackish, and freshwater marshes, pond borders, wet meadows, and grassy swamps.	No
Red-cockaded woodpecker	Endangered	Open mature pine woodlands, rarely deciduous or mixed pine-hardwoods located near pine woodlands.	No
Wood stork	Threatened	Wetlands, primarily cypress swamps.	No
<i>Reptiles</i>			
Eastern indigo snake	Threatened	Sandhill regions dominated by mature longleaf pines, turkey oaks, and wiregrass;	Limited potential at Sites 1, 2, and 4
Gopher tortoise	Candidate	Well-drained sandy substrate, ample herbaceous vegetation for food, and sunlit areas for nesting.	Limited potential at Sites 2 and 4
<i>Amphibians</i>			
Frosted flatwoods salamander	Threatened	Mesic Long-Leafed Pine, flatwoods, and savannahs.	No
<i>Crustaceans</i>			
Squirrel chimney cave shrimp	Threatened	Obligate cavernicole; known only from one water-filled cave contiguous with a deep sinkhole.	No

The IPaC reports also identified fourteen bird species protected under the Migratory Bird Treaty Act (MBTA) for the Action Alternative sites region. Based on habitat information obtained from the NatureServe Explorer internet application, only five of these species (bald eagle, common ground

dove, red-headed woodpecker, short-tailed hawk, and swallow-tailed kite) could potentially be present on the Action Alternative sites during breeding season. For the remaining migratory bird species, there is little to no suitable habitat at the sites.

The Florida Natural Areas Inventory (FNAI 2019) stated that after review of the Action Alternative sites, a FNAI Standard Data Report is not required; however, the eastern portion of Site 2 may slightly overlap or fall adjacent to a single 2004 occurrence of a juvenile eastern indigo snake (federally listed threatened).

According to the Florida Fish and Wildlife Conservation Commission (FWWCC) Terrestrial Resources GIS internet application, no federal or state-listed protected species are known to be located on or near the Action Alternative sites. In addition, the swallow-tailed kite is the only migratory bird species that has the potential to be located in the vicinity of the Action Alternative sites.

Site 1

FWWCC stated that Site 1 has potential habitat to support the presence of the federally listed threatened eastern indigo snake and the Florida black bear. FFWCC indicated Site 1 is located within the Central Bear Management Unit and Florida black bears are abundant in the area. FFWCC recommended coordinating with USFWS North Florida Ecological Services Office for federally listed species; and taking measures during the implementation of the Proposed Action to prevent or reduce conflicts with bears (FWWCC 2019).

Site 2

FWWCC stated that Site 2 has potential habitat to support the presence of the federally listed threatened eastern indigo snake, the state-listed threatened southeastern American kestrel, and the state-listed threatened gopher tortoise. The FFWCC recommended coordinating with USFWS North Florida Ecological Services Office for federally listed species; conducting a southeastern American kestrel survey during their nesting season (April to August) within suitable habitat areas; and following FFWCC's Gopher Tortoise Permitting Guidelines (Revised January 2017) for survey methodology and permitting guidance prior to any development activity (FWWCC 2019).

ACGMD stated gopher tortoises have the potential to be present in the Site 2 area; however, no gopher tortoise burrows were identified during a previous study of the Springhills TNT/TOD project area (including Site 2), and no gopher tortoise burrows were observed during the brief site review conducted by ACGMD (ACGMD 2019). In addition, TTL observed no gopher tortoise burrows at Site 2 during the June 2019 reconnaissance.

During TTL's reconnaissance of Site 2 in June 2019, no suitable southeastern American kestrel habitat (less than 25% tree cover with herbaceous ground cover less than 25 centimeters in height) was identified at the site and no kestrels were observed at the site. As such, it is unlikely that southeastern American kestrels are present at Site 2.

Site 3

FWWCC stated that no protected species occurrences were identified within 0.5 miles of Site 3 (FWWCC 2019).

Site 4

According to ACGMD, the efforts associated with 2015 development plans for Site 4 did not identify any protected species at the site (ACGMD 2019).

3.7.3 Effects of the Action Alternatives

As confirmed by the USFWS, the Proposed Action is not likely to have adverse effects on federally listed protected species or their critical habitats at any of the Action Alternative sites.

Marginally suitable habitats for gopher tortoises (state-listed threatened) exist at Site 2 and 4; however, no gopher tortoise burrows were observed at either site. If Site 2 or Site 4 is selected, a preconstruction gopher tortoise survey would be conducted as recommended by FFWCC, and any identified tortoises would be relocated in coordination with the FFWCC.

It is anticipated that vegetation clearing would occur outside of the early March to late June swallow-tailed kite nesting season to avoid impacts to species protected under the MBTA. If vegetation clearing occurs within migratory bird nesting season, impacted vegetation would be surveyed by a qualified biologist to for active nests prior to clearing. Active nests would not be disturbed.

Site 1

Site 1 is located within the ISSSA boundaries and contains an upland hardwood hammock with scattered pines that may be considered significant upland habitat as defined by Alachua County. If Site 1 is selected, it would be evaluated for significant upland habitat, as required, prior to site design. If significant upland habitat is identified, the OPC and/or MHC development would be designed to maintain at least 50 percent of the significant upland habitat as undeveloped land with the existing vegetation, as required under the ACULDC for the ISSSA. Large trees present at the site would be protected or mitigated, if removed.

Site 1 is located within an area with abundant Florida black bear. VA's developer would implement recommended management measures provided by the FFWCC to prevent or reduce conflicts with bears resulting from the Proposed Action.

Site 2

Two isolated wetlands are located in the southeastern portion of Site 2. The wetlands and associated buffers are designated as a CMA associated with the 390-acre Springhills TND/TOD, limiting use to those activities that do not adversely affect natural resource function and ecological integrity (that is, no ground-disturbing activities are allowed). VA's developer would comply with the CMA requirements.

Through the implementation of these management measures and BMPs, wildlife and habitat impacts would be less than significant.

VA's closure of the existing leased mental health clinics would have no wildlife and habitat impacts.

3.7.4 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to biological resources by VA would occur. However, should the Action Alternative sites ultimately be developed by others, impacts similar to those identified under the Proposed Action could occur.

3.8 Noise

Site 1

The existing noise environment around Site 1 is relatively quiet with noise from vehicle traffic along SW Williston Road and SW 34th Street, and more distant vehicle noise from Interstate 75 (approximately 800 feet west of the site). No other notable noise-generating sources are present in the immediate vicinity of Site 1. As such, the noise environment of Site 1 can be characterized as that typical of a suburban area.

Site 2

The existing noise environment around Site 2 is relatively quiet with vehicle traffic noise from Interstate 75 (approximately 300 feet southwest of the site) and NW 39th Avenue. No other notable noise-generating sources are present in the immediate vicinity of Site 2. As such, the noise environment of Site 2 can be characterized as that typical of a suburban area.

Site 3

The existing noise environment around Site 3 is relatively quiet with limited noise from vehicle traffic along NW 53rd Avenue. No other notable noise-generating sources are present in the immediate vicinity of Site 3. As such, the noise environment of Site 3 can be characterized as that typical of a suburban area.

Site 4

The existing noise environment around Site 4 is relatively quiet with limited noise from vehicle traffic along SW 75th Street and SW 24th Avenue. No other notable noise-generating sources are present in the immediate vicinity of Site 4. As such, the noise environment of Site 4 can be characterized as that typical of a suburban area.

3.8.1 Sensitive Receptors

Sensitive noise receptors in the vicinity of Action Alternative sites include residential areas and the women's shelter adjacent to Site 3 and the senior care facility/nursing home and residential areas adjacent to Site 4. No sensitive noise receptors are located in the vicinity of Sites 1 and 2.

3.8.2 Effects of the Action Alternatives

The Proposed Action would have short-term impacts to the existing noise environment due to construction activities. Noise generating sources during construction activities would be associated primarily with standard construction equipment and construction equipment

transportation. These increased noise levels could directly affect the neighboring areas. Activities would be conducted in accordance with the ACULDC and GCO.

Construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Construction activities are expected to generally be typical of other similar construction projects and would include mobilization, site preparation, excavation, placing foundations, utility development, heavy equipment movement, and paving roadways and parking areas. The most prevalent noise source at typical construction sites is the internal combustion engine. General construction equipment using engines includes, but is not limited to: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA (decibels, A-weighted scale) would occur on the active construction site, decreasing with distance from the construction areas. Generally speaking, peak noise levels within 50 feet of active construction areas and material transportation routes would most likely be considered “striking” or “very loud”, comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud - approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25 miles, construction noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times. Table 2 presents peak noise levels that could be expected from a range of construction equipment during proposed construction activities.

Combined peak noise levels when several loud pieces of equipment are used in a small area at the same time, are expected to occur rarely, if ever, during the project. However, under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the construction area, depending on equipment being used.

Although noise levels would be quite loud in the immediate area, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Construction workers would follow standard federal Occupational Safety and Health Administration (OSHA) requirements to prevent hearing damage.

Areas that could be most affected by noise from construction include those closest to the construction footprint, including the residences and women’s shelter located adjacent to Site 3 and the residences and senior care facility located adjacent to Site 4. Indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels. In addition, BMPs (described in Section 5) would be implemented to reduce noise impacts. Direct construction noise impacts would be temporary and less than significant.

Indirect impacts include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes)

transit to and from the site. Persons in the project area would experience temporary increases in traffic noise during daytime hours. These effects are not considered significant because they would be temporary, intermittent, and similar to existing traffic noise levels in the area.

Table 2. Peak Noise Levels Expected from Typical Construction Equipment

Source	Peak Noise Level (dBA, attenuated)							
	Distance from Source (feet)							
	0	50	100	200	400	1,000	1,700	2,500
Heavy Truck	95	84-89	78-93	72-77	66-71	58-63	54-59	50-55
Dump Truck	108	88	82	76	70	62	58	54
Concrete Mixer	108	85	79	73	67	59	55	51
Jack-hammer	108	88	82	76	70	62	58	54
Scraper	93	80-89	74-82	68-77	60-71	54-63	50-59	46-55
Bulldozer	107	87-102	81-96	75-90	69-84	61-76	57-72	53-68
Generator	96	76	70	64	58	50	46	42
Crane	104	75-88	69-82	63-76	55-70	49-62	45-48	41-54
Loader	104	73-86	67-80	61-74	55-68	47-60	43-56	39-52
Grader	108	88-91	82-85	76-79	70-73	62-65	58-61	54-57
Pile driver	105	95	89	83	77	69	65	61
Forklift	100	95	89	83	77	69	65	61
Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)								
Combined Peak Noise Level	Distance from Source							
	50 feet	100 feet	200 feet	¼ mile	½ mile			
	103	97	91	74	68			

Source: Tipler 1976

No significant long-term noise impacts are anticipated with the operation of the proposed OPC and MHC. The OPC and MHC would be quiet medical office facilities with operational noise from HVAC systems typical of other comparably sized commercial buildings and grounds maintenance noise (such as lawn mowing or, leaf blowers). Proposed operational activities at the new OPC and MHC would also include vehicle traffic to and from the selected Action Alternative site(s). The vehicle traffic would not produce excessive noise, is consistent with the existing noise environment of the Action Alternative site areas, and would not produce a significant adverse noise impact on surrounding land uses.

3.8.3 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment of the Action Alternative sites would not be altered by activities of VA; however, the development of the Action Alternative sites by others would likely produce similar construction and operational noise impacts as identified under the Proposed Action.

3.9 Land Use

Site 1

Site 1 includes approximately 17 acres of unimproved wooded land and occupies the southern and western portions of an approximately 36-acre parcel. The properties surrounding Site 1 are generally unimproved land with commercial properties to the north and west, and an office park to the southwest. According to the Alachua County Zoning Administration (ACZA), Site 1 is currently zoned Business, Highway (BH). Health care facilities are a permitted use under the current zoning designation for Site 1.

Surrounding properties to the north of Site 1, across SW Williston Road, are located in the City of Gainesville and zoned Corporate Park (CP). Properties adjoining to the east of Site 1 are currently zoned BH, Single-Family Residential (RE), and Residential Professional District (RP). Properties adjoining to the south of Site 1 across SW 56th Avenue are currently zoned BH and RE. Properties adjoining to the west of Site 1 across SW 34th Street are currently zoned BH. Zoning designations for Site 1 and surrounding properties are shown on Figure 17.

Site 2

Site 2 includes approximately 18.6 acres of unimproved grassy and wooded land, two small wetlands in the southeastern portion, and an abandoned road in the south-central portion. Site 2 is located in the southern portion of the 390-acre Springhills TND/TOD planned development area. The properties surrounding Site 2 are generally unimproved land with commercial properties to the east and west, and Interstate 75 to the southwest. According to the ACZA, the majority of Site 2 is zoned Wholesale/Warehousing (BW) and Business Highway (BH). Two small areas in the southeastern portion of Site 2, corresponding to the wetlands, are zoned Conservation District (C-1). Health care facilities are a permitted use under the current primary zoning designations for Site 2.

The neighboring properties to the north of Site 2 are also currently zoned BW. The neighboring properties to the east and south are currently zoned BH. The neighboring property to the west is currently zoned BW. Areas associated with Interstate 75 to the south and west are not currently zoned. Zoning designations for Site 2 and surrounding properties are shown on Figure 18.

Site 3

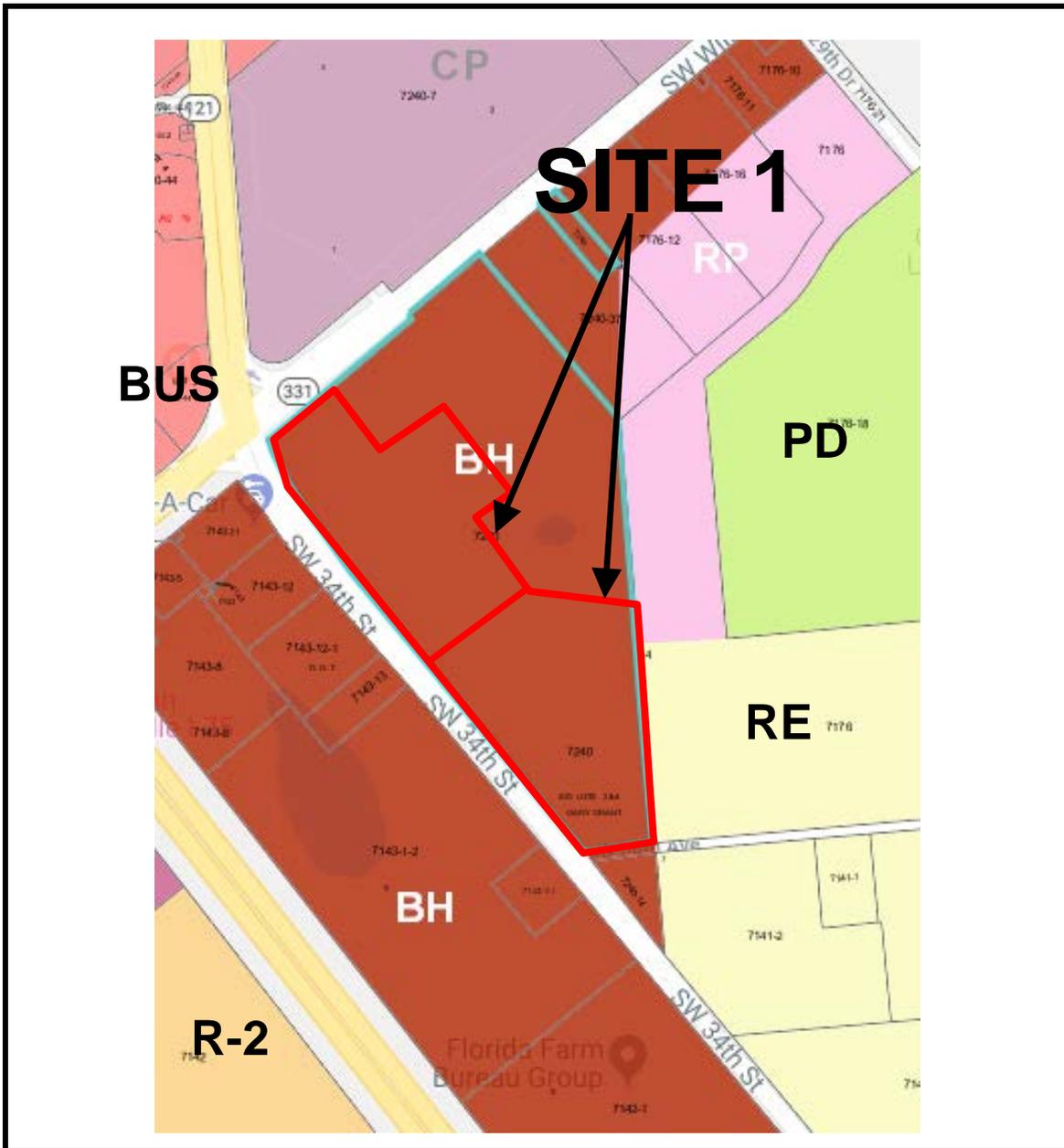
Site 3 includes approximately 8 acres of unimproved wooded land within the City of Gainesville. The properties surrounding Site 3 are primarily residential and some unimproved land. According to the Gainesville Planning Department, Site 3 is zoned Multi-Family (RMF7). Health care facilities are not a permitted, special, or accessory use under the current zoning designations for Site 3.

The neighboring property to the north of Site 3, occupied by NW 55th Boulevard and a green belt, is currently zoned RMF7 and Conservation (CON). Properties north of the green belt are zoned RMF7. The neighboring properties to the east of Site 3 are currently zoned RMF7 and General Office (OF). The narrow neighboring property to the south of Site 3 is currently zoned Public Services (PS) and is occupied by a municipal drainage and public utility ROW. Residential properties south across NW 53rd Avenue are zoned Planned Development (PD). The neighboring properties to the west of Site 3 are currently zoned PS and Single-Family Residential (RSF2). Zoning designations for Site 3 and surrounding properties are shown on Figure 19.

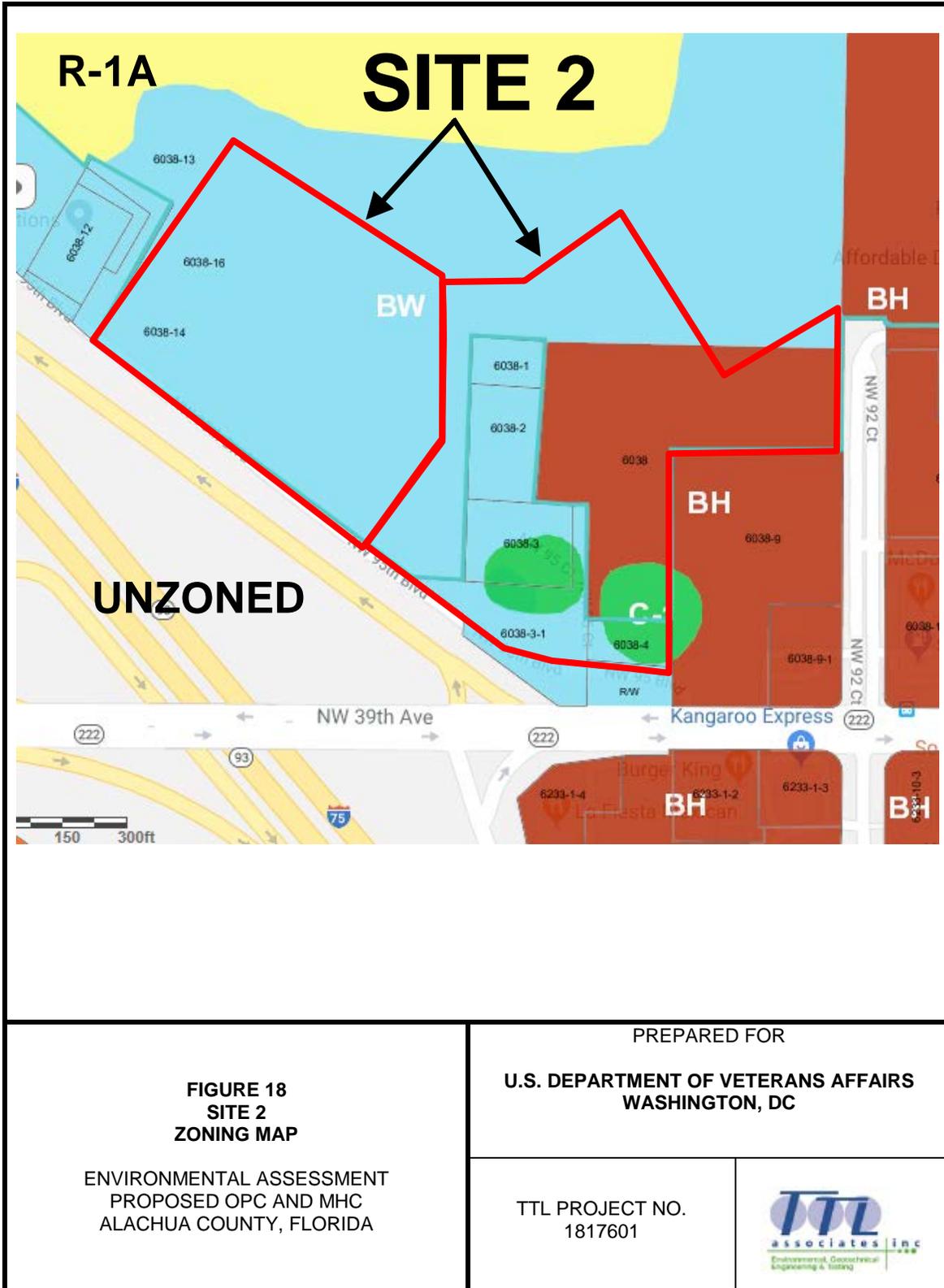
Site 4

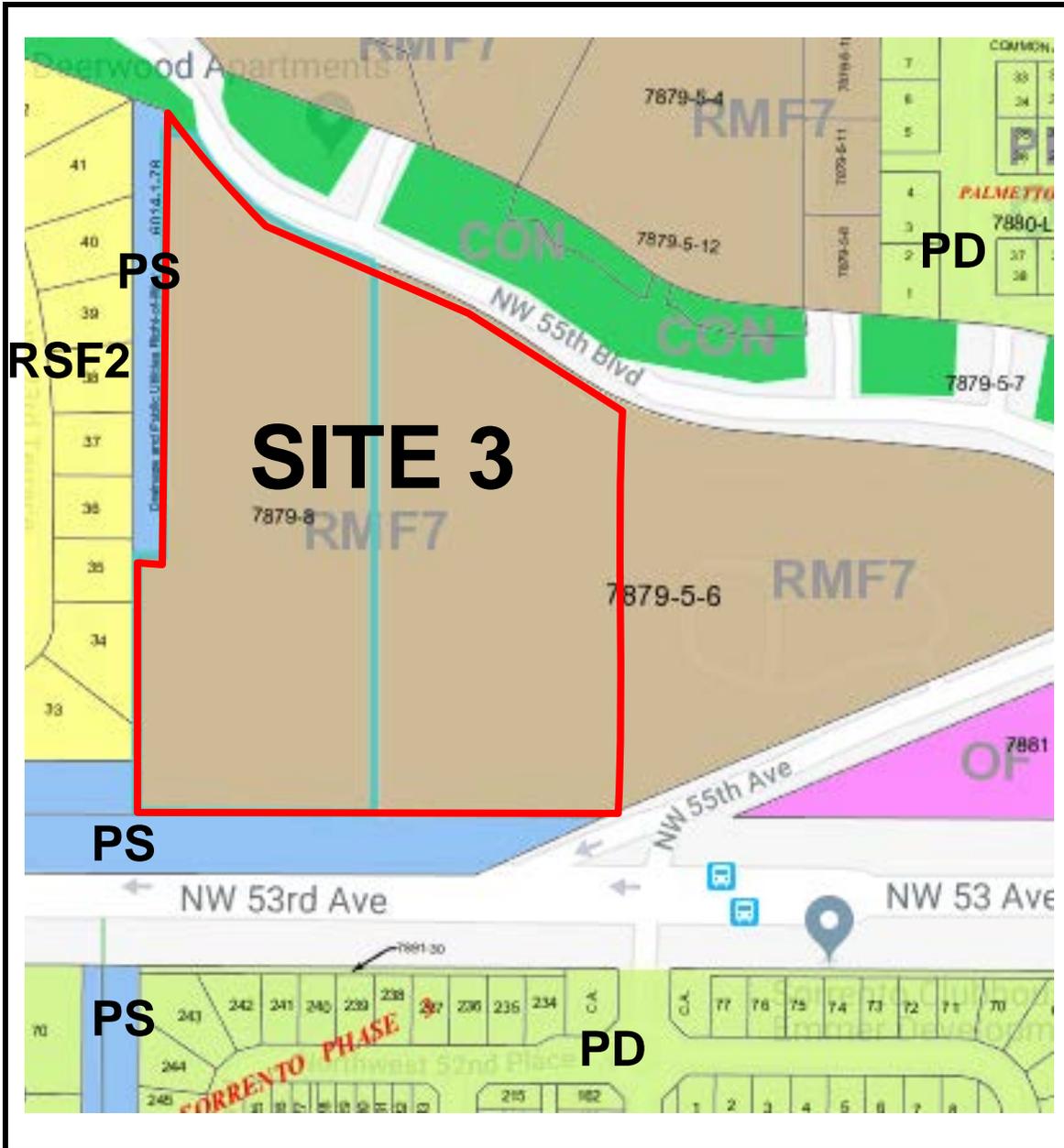
Site 4 includes approximately 8.5 acres of unimproved wooded and grassy land. Site 4 is surrounded by a mixture of residential and commercial properties. According to the ACZA, Site 4 is zoned Planned Development District (PD). Health care facilities are a permitted use under the current zoning designations for Site 4.

The neighboring properties to the north, east, and south of Site 4 are also currently zoned PD. The neighboring properties to the west of Site 4 are currently zoned PD and R-1A. Zoning designations for Site 4 and surrounding properties are shown on Figure 20.



<p>FIGURE 17 SITE 1 ZONING MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p> 





**FIGURE 19
SITE 3
ZONING MAP**

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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TTL PROJECT NO.
1817601





<p align="center">FIGURE 20 SITE 4 ZONING MAP</p>	<p align="center">PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p align="center">ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p align="center">TTL PROJECT NO. 1817601</p>	

3.9.1 Effects of the Action Alternatives

The Proposed Action at Sites 1, 2, and 4 would be consistent with local zoning and compatible with surrounding land use and would have negligible land use effects. Site 3 would require rezoning from its current RMF7 zoning designation to a zoning designation suitable for medical facilities; however, the City of Gainesville has reportedly agreed to the rezoning of Site 3 in concept. Land use effects of the Proposed Action at Site 3 would be less than significant. No adverse onsite building function or architecture impacts are anticipated. The OPC and MHC would be designed and constructed in accordance with local building codes and zoning ordinances.

VA's closure of the existing leased mental health clinics would have negligible land use impacts.

3.9.2 Effects of the No Action Alternative

Under the No Action Alternative, no land use impacts due to VA's Proposed Action would occur. The Action Alternative sites would likely be developed by others for commercial or residential (Site 3) use in accordance with local zoning regulations. The land use impacts (and associated community benefits) of any future proposed developments would depend upon the use proposed.

3.10 Wetlands, Floodplains, and Coastal Zone Management

3.10.1 Wetlands

This section discusses wetlands at or near the Action Alternative sites and surface waters (streams) as they pertain to wetlands. Additional information regarding surface waters is provided in Section 3.6.

Site 1

No wetlands were identified at Site 1 on the USFWS National Wetland Inventory (NWI) online wetland mapper (Figure 21) or the Alachua County Map Genius internet application (Figure 22); however, a small freshwater emergent wetland (apparently associated with a sinkhole) is located adjoining to the east of Site 1 and a fresh water pond is located west of Site 1, across SW 34th Street. No other visual evidence of wetlands was observed at Site 1 or the surrounding properties during the site reconnaissance.

According to the ACGMD (ACGMD 2019), no wetlands or surface waters are located at Site 1; however, an isolated forest wetland is located adjoining to the east of Site 1. The ACGMD stated that development would be required to follow the wetland and surface water buffer requirements of the ACULDC (minimum of 50 feet).

Site 2

One freshwater pond was identified in the southeastern portion of Site 2 on the USFWS NWI (Figure 23). Two wetland areas were identified in the southeastern portion of Site on the Alachua County Map Genius internet application (Figure 24). No other visual evidence of wetlands was observed at Site 2 or the surrounding properties during the site reconnaissance.

ACGMD stated that the two isolated wetlands and associated floodplains in the southeastern portion of Site 2 are associated with sinkholes. ACGMD indicated that the identified wetlands and associated buffers are designated as a CMA (ACGMD 2019).

The SJRWMD stated that a Formal Wetland Determination (FWD), number 16-001-126047-1, was issued on November 17, 2011 and expired on November 17, 2016 for Site 2. SJRWMD stated that since the FWD has expired, a field review would be necessary to determine if wetlands or surface waters exist on Site 2 (SJRWMD 2019).

Site 3

No potential wetlands were identified at Site 3 on the USFWS NWI online wetland mapper. The NWI map notes the stormwater drainage ditch located along the northern side of NW 53rd Avenue, west of the site (Figure 25). Two small freshwater emergent wetlands were depicted on the western portion of Site 3 and a very small portion of a freshwater emergent wetland complex was depicted on the northwest corner of Site 3 on the Alachua County Map Genius internet application (Figure 26). A drainage ditch is located along the northern half of the western boundary of Site 3 discharges to a drain located at the northwestern corner of Site 3 and that flows to the north across NW 55th Boulevard and then along the northern side of the road. No other visual evidence of potential wetlands was observed at Site 3 or the surrounding properties during the site reconnaissance.

According to the ACGMD, three potential small wetland areas (each approximately 0.04-acre in size) were recently delineated with flagging tape on the western portion of Site 3. According to the ACGMD, these areas were evaluated and found not to have sufficient hydrophytic vegetative, hydric soil or hydrologic indicators to be classified as wetlands. ACGMD indicated that there are no areas on Site 3 that meet the criteria to be considered surface waters or wetlands (ACGMD 2019).

Site 4

No wetlands were identified at Site 4 on the USFWS NWI online wetland mapper (Figure 27) or the Alachua County Map Genius internet application (Figure 28). No visual evidence of wetlands was observed at Site 4 or the surrounding properties during the site reconnaissance.

The wetlands identified at Site 2 and the pond located adjacent to the east of Site 1 appear to be associated with sinkholes and would likely be classified as isolated, outside of the jurisdiction of the USACE, and under the jurisdiction of the FDEP. In Florida, a FDEP-issued ERP is required prior to any direct or indirect impacts to isolated wetlands. In addition, both Alachua County and the City of Gainesville require a review and approval of site plans, as they pertain to surface waters and wetlands, prior to the issuance of construction permits.

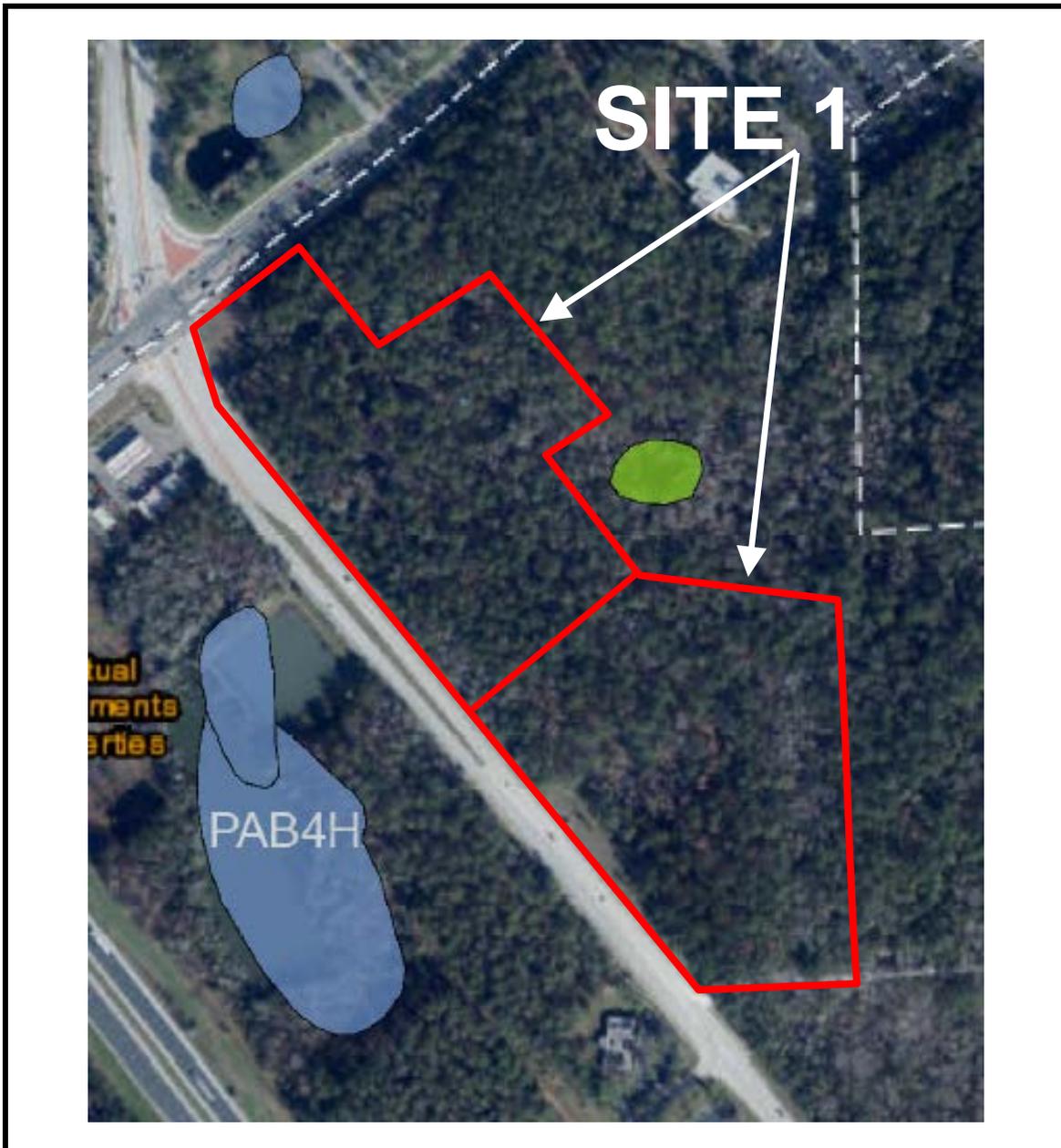


FIGURE 21
SITE 1
NWI MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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**FIGURE 22
SITE 1
ALACHUA COUNTY WETLANDS MAP**

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

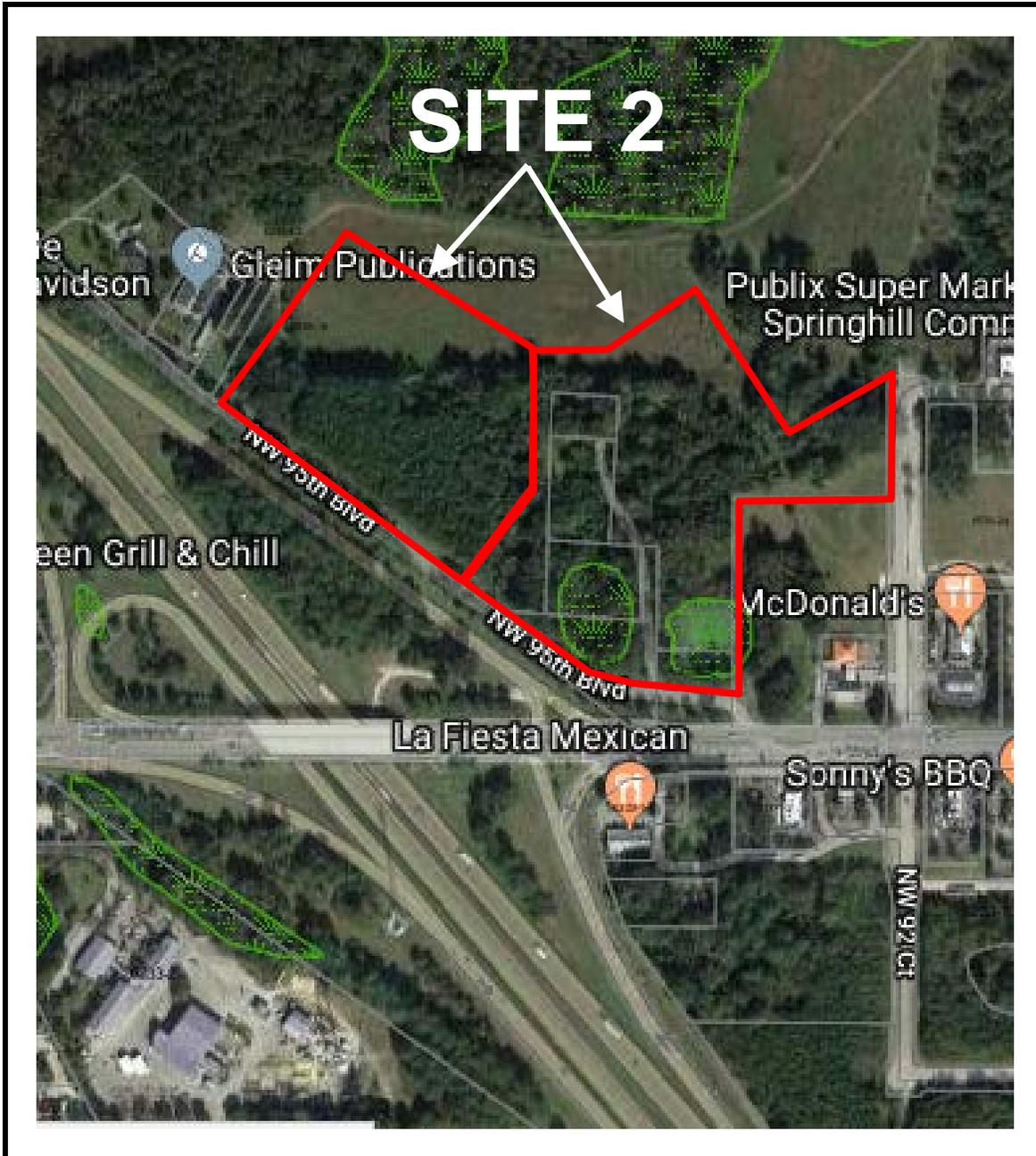
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<p>FIGURE 23 SITE 2 NWI MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	 <p>TTL associates inc Environmental, Geotechnical Engineering & Testing</p>



<p>FIGURE 24 SITE 2 ALACHUA COUNTY WETLANDS MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	



**FIGURE 25
SITE 3
NWI MAP**

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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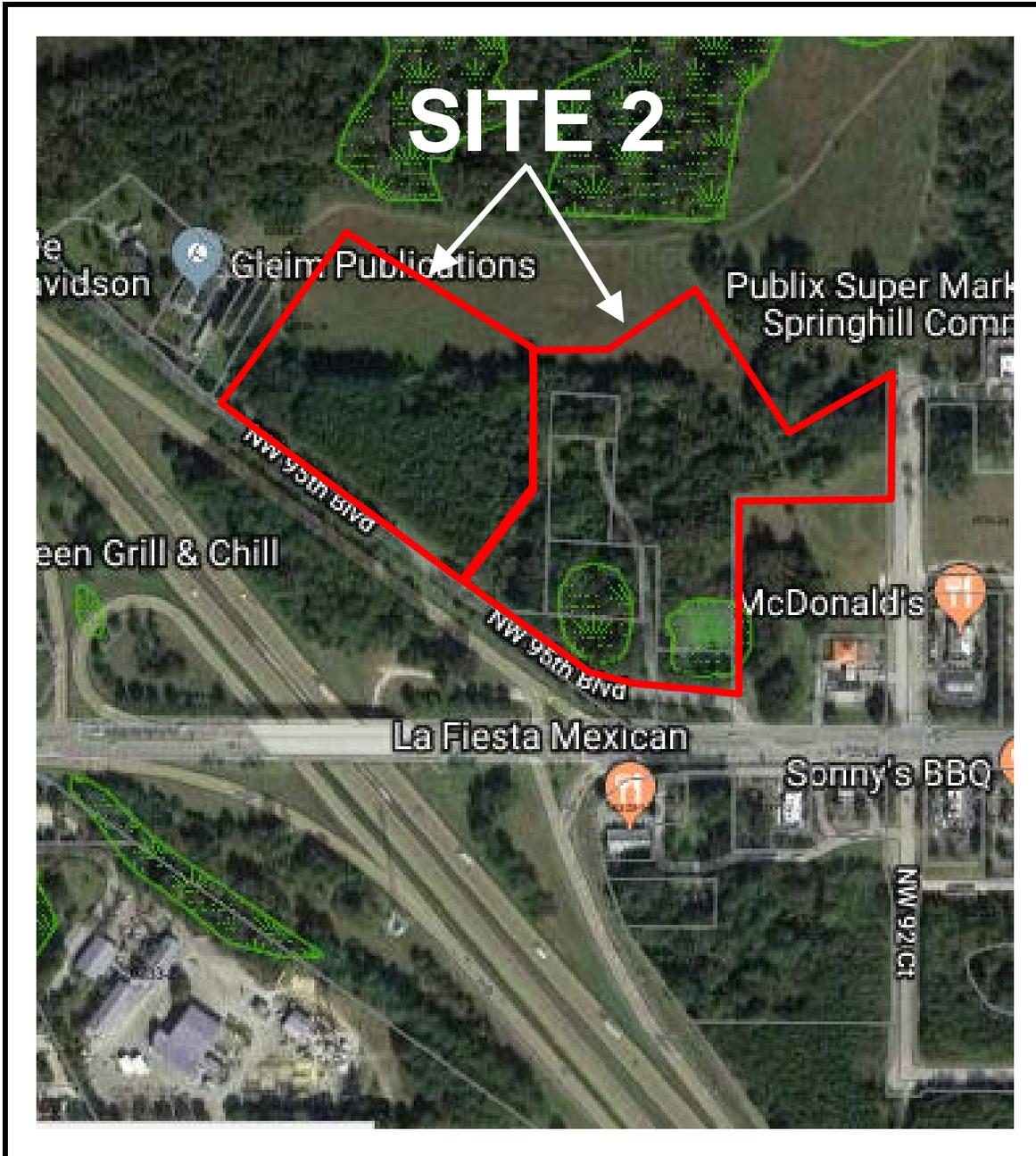
**FIGURE 26
SITE 3
ALACHUA COUNTY WETLANDS MAP**

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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**FIGURE 27
SITE 4
NWI MAP**

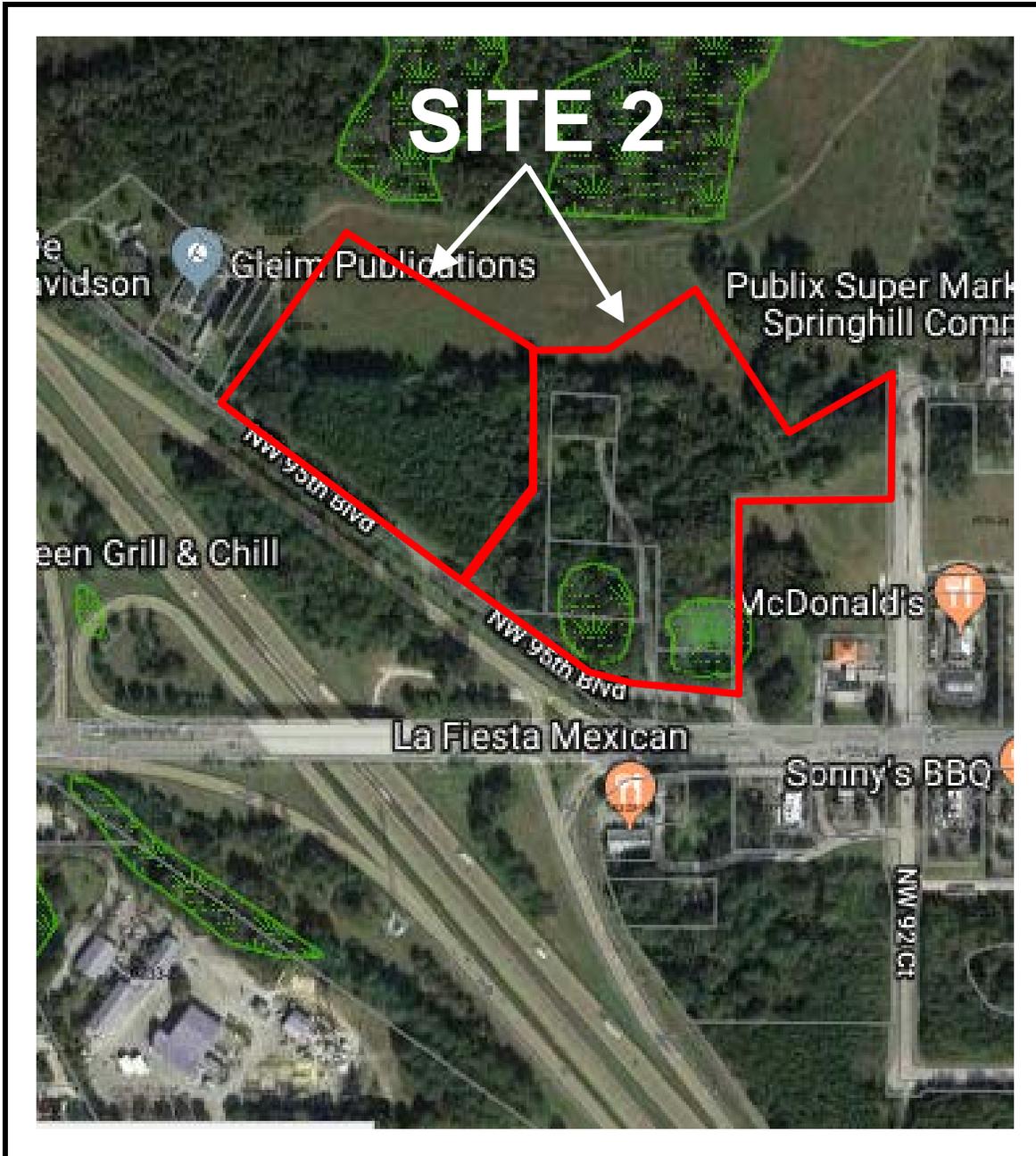
ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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1817601





<p>FIGURE 28 SITE 4 ALACHUA COUNTY WETLANDS MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	

3.10.2 Floodplains

The Federal Emergency Management Agency (FEMA) National Flood Hazard Flood Layer FIRMette (FIRMette) internet mapping application was used to determine if the Action Alternative sites or surrounding properties are located in designated floodplains.

Site 1 is not located within the 100-year or 500-year floodplain. The pond located adjoining to the east of Site 1 and the pond located west of Site 1, across 34th Street, are depicted as being located within the 100-year floodplain (Figure 29).

The western wetland located in the southeastern portion of Site 2 is depicted as being within the 100-year floodplain. The remainder of Site 2 and the surrounding area are not located within a floodplain (Figure 30).

Site 3 and the surrounding area are not located within the 100-year or 500-year floodplain (Figure 31).

The southwestern corner of Site 4 and off-site properties to the west, northwest, and northeast of Site 4 are shown to be located within the 100-year floodplain (Figure 32).

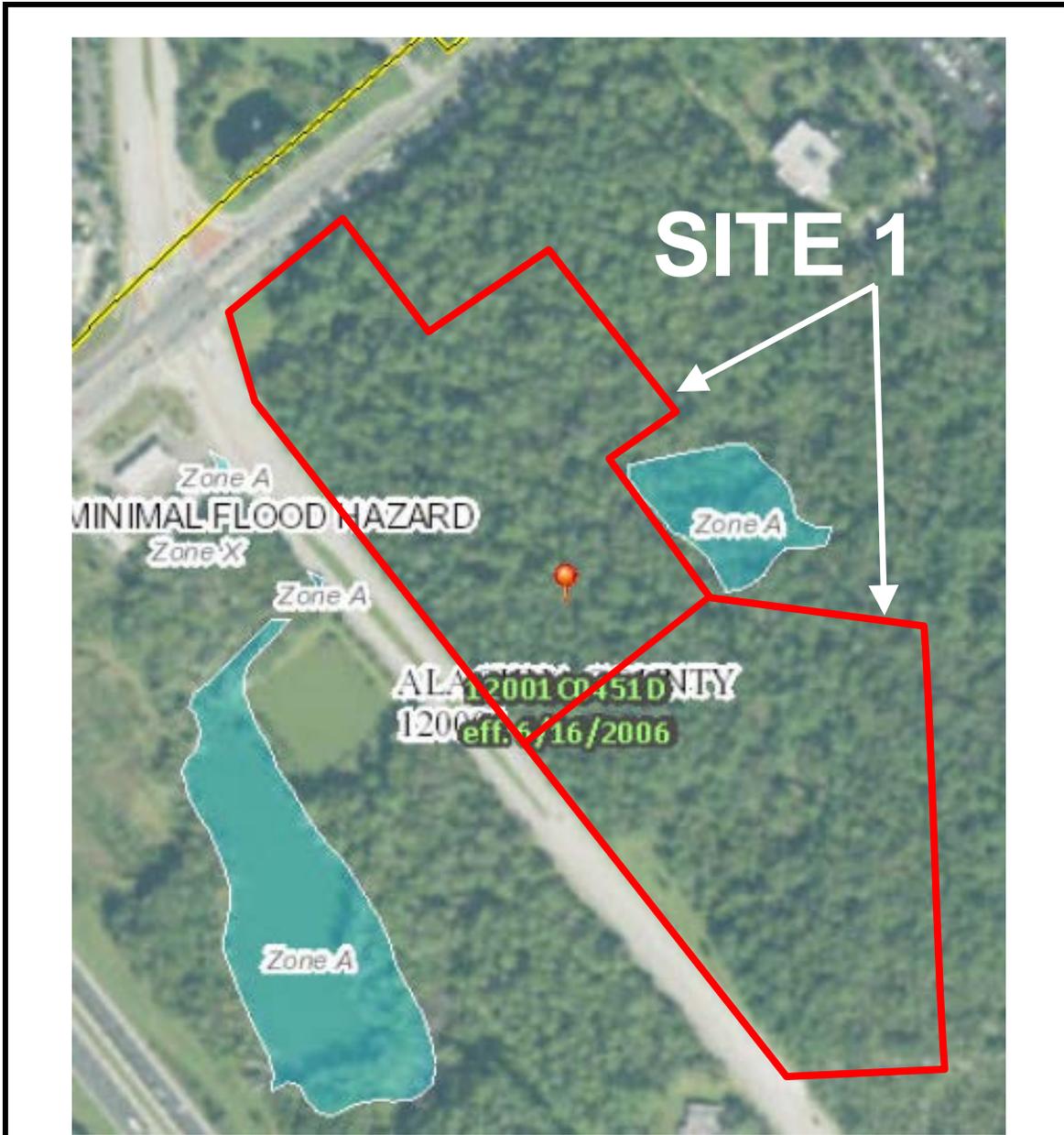


FIGURE 29
SITE 1
FEMA FLOODPLAIN MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

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<p>FIGURE 30 SITE 2 FEMA FLOODPLAIN MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	





<p>FIGURE 32 SITE 4 FEMA FLOODPLAIN MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	 <p>TTL associates inc Environmental, Geotechnical Engineering & Surveying</p>

3.10.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA of 1990, as amended (16 USC 1451 *et seq.*) encourages states to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats.

The entirety of the State of Florida is identified as being in a managed coastal zone and the CZMA is administered by the FDEP-Coastal Management Program (FCMP). Consequently, VA, as a federal agency, must coordinate with the FDEP to ensure that its Proposed Action is consistent with the FDEP's Coastal Zone Management Program. A formal review of plans and specifications would be required prior to site construction activities (FDEP 2019).

The FSCH stated that based on the information submitted regarding the Proposed Action and the minimal project impacts, the State of Florida has no objection to the use of federal funds for the Proposed Action and; therefore, the funding for award is consistent with the FCMP. FSCH stated that the state final concurrence with the FCMP will be determined during any environmental permitting processes (FSCH 2019).

3.10.4 Effects of the Action Alternatives

The Proposed Action would not result in significant impacts to regulated wetlands. No wetlands are located on Sites 1, 3, or 4. Two isolated wetlands associated with sinkholes are located in the southeastern portion of Site 2. These wetlands and their associated buffers are already designated as a CMA and are protected from development. As required, VA's selected developer would design the OPC and/or MHC developments to avoid impacting these protected wetland areas. The off-site freshwater pond located adjacent to the east of Site 1 is also protected from impacts by the buffer requirements of the ACULDC. VA's developer would complete the site design to maintain the undeveloped buffer around the off-site wetland, as required.

The Proposed Action would have less than significant impacts on floodplains. No floodplains were located at Sites 1 and 3. Site 2 contained a small floodplain area associated with the wetlands in the southeastern portion of the site. This area of Site 2 is protected from development through a CMA and would not be disturbed by the Proposed Action. The southwestern corner of Site 4 is also located within the 100-year floodplain. Conceptual development plans for the floodplain area include an entrance drive to the proposed MHC, landscaping, and a small amount of surface parking. The proposed MHC building would not be located within or near the floodplain. During the site design, the developer would evaluate current conditions in the floodplain area and the proposed filling of the floodplain as a result of the MHC development, and would ensure that the design includes sufficient compensatory storage so the development does not affect flood elevations, conveyance, or storage on surrounding properties. The developer would obtain a floodplain development permit from Alachua County, as required. In addition, all Action Alternatives include on-site stormwater retention and would be designed not to affect hydrology of the surrounding properties.

As confirmed by the FSCH, the Proposed Action would have minimal coastal zone impacts. Final concurrence would be determined during the review of plans and specifications to obtain permits for site development. However, coastal zone impacts are anticipated to be negligible.

VA's closure of the leased mental health clinics would have no wetland, floodplains, or coastal zone impacts.

3.10.5 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to wetlands, floodplains, or coastal zones would occur as a result of the Proposed Action. The Action Alternative sites would likely be developed for commercial or residential use by others, which could result in wetlands and floodplain impacts, depending on the future development.

3.11 Socioeconomics

The following subsections identify and describe the socioeconomic environment of the City of Gainesville, Alachua County, and the State of Florida. The data provide an understanding of the socioeconomic factors that have developed the area. Socioeconomic areas of discussion include the local demographics of the area, regional and local economy, and local recreation activities. Data used in preparing this section were collected from the 2010 Census of Population and Housing (U.S. Census Bureau), subsequent U.S. Census Bureau data, and the U.S. Department of Commerce Bureau of Economic Analysis (BEA).

Demographics

The City of Gainesville and Alachua County have similar minority populations to the national average (38.8%) and slightly lower than that of the State of Florida as a whole. Minority populations specific to the Action Alternative site areas are discussed in Section 3.16 (Environmental Justice). Age distribution and high school graduation rates are generally similar throughout Gainesville, Alachua County, and Florida (Table 3).

Area	All Individuals (2018 Estimate)	Population Under 18 Age Years (2018)	Population Over 65 Age Years (2018)	Minority (2018)	High School Graduates (2013-17)	Veterans (2013-17)
Florida	21,299,325	19.9 %	20.5 %	46.6 %	87.6 %	1,454,632
Alachua County	269,956	18.0 %	14.0 %	37.7 %	92.1 %	15,456
Gainesville	133,857	12.5 %	9.7 %	40.0 %	91.5 %	5,609

Note: People of Hispanic or Latino origin may be of any race.
Source: U.S. Census Bureau, 2010 Census, Profile of General Demographic Characteristics, 2013-2017.
N/A – Not Available

Employment and Income

The City of Gainesville and Alachua County have lower median household incomes and larger populations below the poverty line than the State of Florida as a whole (Table 4). Household incomes specific to the Action Alternative site areas are discussed in Section 3.16.

Area	Number of Households	Median Household Income	Population Below Poverty Level	Unemployment Rate May 2019
Florida	7,510,882	\$50,883	14.0 %	3.5 %
Alachua County	97,485	\$45,478	21.2 %	2.6 %
Gainesville	48,993	\$34,004	33.6 %	3.2 %

Source: U.S. Census Bureau, 2010 Census, Profile of General Demographic Characteristics, 2013-2017.
N/A – Not Available

Commuting Patterns

Residents of the Gainesville area are largely dependent on personal automobiles for transportation to and from work. Other methods of transit include public transportation (Gainesville Regional Transit System or RTS), carpooling, and walking. The average commuting time in Gainesville and Alachua County was approximately 18 to 21 minutes in 2017.

Protection of Children

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, *Protection of Children From Environmental Health Risks and Safety Risks*, was introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that federal agencies' policies, programs, activities, and standards address environmental risks and safety risks to children. This section identifies the distribution of children and locations where numbers of children may be proportionately high (such as schools, childcare centers, family housing) in areas potentially affected by the Proposed Action.

Children are not regularly present at any of the Action Alternative sites. Children may be present in the off-site residential areas located near the Sites 3 and 4. No schools or playgrounds are located in the immediate area of any of the Action Alternative sites.

3.11.1 Effects of the Action Alternatives

The Proposed Action is anticipated to result in short-term, direct, beneficial impacts to local employment and personal income. Construction of the proposed new OPC and MHC would

provide additional temporary construction jobs in the private sector, thus providing short-term socioeconomic benefit to the selected site area(s).

The Proposed Action would result in significant long-term beneficial health impacts by providing a new OPC and a new MHC that would enhance the health care provided to regional U.S. Veterans.

No adverse health or safety risks to children are anticipated to result from construction or operation of the new OPC and MHC. Children are not regularly present at the Action Alternative sites. In addition, once operational, children would only be present at the OPC and MHC as visitors; all Veterans are above the age of 18. Construction areas would be secured to prevent unauthorized access by children from the nearby residential areas. The construction contractor would limit and control construction dust and noise as discussed in Section 5, thereby minimizing adverse effects to children in the area.

VA's closure of the existing leased mental health clinics would have negligible socioeconomic impacts. These facilities would likely be leased for another commercial use.

3.11.2 Effects of the No Action Alternative

The No Action Alternative would result in no construction and no increased short- or long-term economic benefit due to VA's action. The Action Alternative sites would likely be developed by others for commercial or residential use in accordance with local zoning. The socioeconomic impacts of any future developments would depend on the proposed use.

Most importantly, the inability of VA to provide adequate medical facilities commensurate with the current and anticipated future needs would result in a significant adverse, long-term, direct impact to U.S. Veterans in the region.

3.12 Community Services

The Action Alternative sites are all located within the Alachua County Public Schools District. There are no schools located within 2,500 feet of the Action Alternative sites (Google Earth 2019).

The Gainesville Police Department (Site 3) and Alachua County Sheriff's Office (Sites 1, 2, and 4) provide police protection and emergency medical services to the Action Alternative sites and their vicinities. Gainesville/Alachua County Fire Rescue provides fire protection and emergency medical services to the Action Alternative sites and their vicinities.

The Gainesville Public Works Department (GPWD), Alachua County Engineering and Operations Division (ACEOD), and/or Florida Department of Transportation (FLDOT) provide maintenance to primary roads and bridges in the vicinity of the Action Alternative sites.

There are no developed recreational facilities in the immediate vicinity of the Action Alternative sites.

There are no hospitals or other major medical facilities located within one mile of the Action Alternative sites.

Public transportation is provided to the vicinity of the Action Alternative sites by RTS, via bus stops along SW Williston Road (Site 1 – Bus Route 35), NW 39th Avenue (Site 2 – Bus Routes 39, 77, and 800x), NW 53rd Avenue (Site 3 – Bus Route 6), and SW 24th Avenue (Site 4 – Bus Route 76). Additional information regarding public transportation in the site vicinities is provided in Section 3.14.

3.12.1 Effects of the Action Alternatives

No significant additional load is expected to be placed on the fire or police departments as the result of implementing the Proposed Action at any of the Action Alternative sites. Coordination with RTS may expand bus services to include new bus stops at the proposed OPC and MHC. Increased use of other public or community services as a result of the Proposed Action is not expected. As such, the Proposed Action is expected to have a negligible impact on local public services.

VA's closure of leased mental health clinics, which would be replaced with the larger, centralized proposed MHC, would have negligible community service impacts.

3.12.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA's selected developer would occur and no impacts to community services would be anticipated. Should the Action Alternative sites be developed in the future by others, community service impacts may occur, depending on the use.

3.13 Solid Waste and Hazardous Materials

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment.

Site 1

A Phase I Environmental Site Assessment (Phase I ESA) of the southern portion of Site 1 was prepared by GSE Engineering and Consulting, Inc. in December 2018 (GSE 2019). The Phase I ESA indicated Site 1 has been heavily to sparsely wooded land with open pasture since at least the 1930s. The site has remained heavily wooded since the 1990s. No environmental concerns or recognized environmental conditions (RECs) were identified. A Phase I ESA was not provided for the northern half of Site 1; however, based on information provided in the Phase I ESA, the use of the northern portion of the site was similar (undeveloped open pasture and wooded land). It does not appear that there are any RECs associated with the northern portion of the site.

Site 2

Partin Group Environmental Services (Partin) completed a Phase I ESA for Site 2 in January 2019 (Partin 2019). The Phase I ESA indicates Site 2 was farmland with minimal residential structures and ancillary rural buildings from at least the late 1800s until the early 2000s, when structures were demolished as part of preparation of the site area for development. Based on information provided in the Phase I ESA and a review of historical aerial photographs, the site was part of

Haufler Farm. The Haufler Farm buildings (residence, barns, other small buildings) were primarily located off-site, north of the northeastern portion of the Site 2. The Phase I ESA identified no environmental concerns or RECs for Site 2.

Appended to the Phase I ESA was a Groundwater Monitoring Report – Former Haufler Farm Property, prepared by Environmental Assessments and Consulting (EAC) and dated September 21, 2016. The EAC report stated that the Haufler Farm has a history of contamination of associated with its former maintenance barn, which was located approximately 100 feet north of the northeast corner of Site 2. EAC indicated chlorinated volatile organic compounds (VOCs) had been identified in soil and groundwater in the maintenance barn area in 2004/2005 that exceeded the cleanup target levels (CTLs). The extent of contamination was delineated and the contaminated area was remediated by chemical oxidation through the injection of potassium permanganate. Post remedial monitoring documented the reduction of chlorinated VOCs to below the CTLs by 2007 and these parameters were eventually eliminated from future monitoring. Groundwater monitoring continued through at least 2016 as a result of elevated metals (aluminum, chromium, and manganese) being detected in groundwater near the maintenance barn in excess of CTLs. The limited area of contamination was reported to be stable and not migrating. The Phase I ESA indicates that FDEP has issued a conditional closure status and a no further action with conditions letter for the minor residual groundwater contamination associated with the Haufler Farm maintenance barn.

The Phase I ESA also included information regarding four small (550-gallon) underground storage tanks (USTs) and a small (260-gallon) aboveground storage tank containing gasoline and diesel that had been located at Haufler Farm and removed in 1988. These tanks had been located off-site in the vicinity of the maintenance barn and had no identified contamination.

Based on the available information, the former maintenance activities and petroleum storage tanks associated with the off-site Haufler Farm maintenance barn, located approximately 100 feet downgradient from the site, are not likely to have impacted soil or groundwater on Site 2.

Site 3

A Phase I ESA for Site 3 was prepared by Verde Environmental in December 2018 (Verde 2019). The Phase I ESA indicates Site 3 has been unimproved wooded land since at least the 1930s. The site was logged in the 1950s and regenerated to a completely wooded condition by the 1970s. No environmental concerns or RECs were identified.

Site 4

A review of historical aerial photographs indicates Site 4 was mostly unimproved wooded land from at least the 1930s until approximately 2007, when the eastern portion of the site was cleared of trees for development. A dirt road and small structure (possible residence) appears to have been present within the woods on the southern portion of the site from approximately 1988 until the early 2000s.

According to an Environmental Data Resources, Inc. (EDR) Radius Map for Site 4, dated December 11, 2018, Site 2 was not identified on any ASTM-specified state, tribal, and federal databases researched by EDR. No environmental concerns associated with Site 4 or the

surrounding properties were identified in the environmental database report or TTL's June 2019 site reconnaissance.

3.13.1 Effects of the Action Alternatives

The Proposed Action would result in short-term, less-than-significant adverse impacts due to the increased presence and use of petroleum and hazardous substances during construction. An increase in construction vehicle traffic would increase the likelihood for release of vehicle operating fluids (such as oil, diesel, gasoline, and antifreeze) and maintenance materials. As such, a less-than-significant, direct, short-term adverse impact is possible. Implementation of standard construction BMPs would serve to ensure this impact is further minimized.

No significant adverse long-term impacts during operation of the OPC and MHC are anticipated. Long-term operational solid wastes, hazardous materials, and medical wastes would be managed in accordance with VA's solid waste and hazardous materials SOPs and applicable federal and state laws. Wastes would be collected and properly disposed of by licensed, contracted transportation and disposal companies.

The Proposed Action would not result in a substantial increase in the generation of solid or hazardous wastes, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation. Based on the Phase I ESAs, and the former mostly undeveloped/agricultural uses of the sites, no contamination is known or suspected to be present at any of the sites.

VA's closure of the leased mental health clinics would have no solid waste or hazardous materials impacts.

3.13.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA's developer would occur and no petroleum and hazardous substances impacts associated with the Proposed Action would occur. Should the Action Alternative sites be developed in the future by others, similar short-term and long-term solid waste and hazardous materials impacts as realized under the Proposed Action could occur, depending upon the use.

3.14 Transportation and Parking

Traffic in the vicinities of the Action Alternative sites is regulated by the Gainesville Public Works Department (Site 3), Alachua County Engineering and Operations Division (Sites 1, 2, and 4), and/or Florida Department of Transportation (all Action Alternative sites).

Public transportation is provided to the vicinity of the Action Alternative sites by RTS, via bus stops along SW Williston Road (Site 1 – Bus Route 35), NW 39th Avenue (Site 2 – Bus Routes 39, 77, and 800x), NW 53rd Avenue (Site 3 – Bus Route 6), and SW 24th Avenue (Site 4 – Bus Route 76). As part of VA's contract requirements, the VA developer(s) would provide public transportation to the selected site(s) either through an extension of the existing public transportation service or a new shuttle service.

Site 1

Access to Site 1 is provided via SW 34th Street from SW Williston Road, which intersects with Interstate 75 approximately 1,000 feet from the site. SW Williston Road is an east-west oriented, four to five-lane paved road (two traffic lanes in each direction and additional turn lanes) with a current estimated Level of Service¹ (LOS) rating of C or better. SW 34th Street is a north-south oriented, two to three-lane paved road (one traffic lane in each direction with associated turn lanes) with a current estimated LOS rating of B or better. SW 34th Street intersects SW Williston Road at the northwest corner of Site 1. The intersection of SW 34th Street and SW Williston Road is fully signalized with dedicated turn lanes in all directions. According to FLDOT, the 2018 annual average daily traffic (AADT) for SW Williston Road in the vicinity of Site 1 was 29,500 vehicles and the 2018 AADT for SW 34th Street in the vicinity of Site 1 was 4,000 vehicles.

SW 56th Avenue, a designated Scenic Road, runs along the southern boundary of Site 1. No access to the OPC and MHC developments at Site 1 would be available from SW 56th Avenue.

Roads near Site 1 are illustrated on Figures 2, 3, and 33. Refer to Table 5 for roadway information for Site 1.

Type	Route	Direction	Site	Road Width (feet)	Lanes	Average Daily Traffic (year)	Estimated Level of Service
Major Arterial	SW Williston Road	East-West	Site 1	75 to 90	4 to 5	29,500 (2018)	C or better
Minor Arterial	SW 34 th Street	North-South	Site 1	75 to 90	2 to 3	4,000 (2018)	B or better
Scenic Road	SW 56 th Avenue	East-West	Site 1	15	1.5	N/A	B or better

AADT Data Source: FLDOT
 Additional Data Source: TTL Site Reconnaissance, June 25, 2019.
 N/A – Not Available

Site 2

Access to Site 2 is currently provided via NW 95th Boulevard and NW 92nd Court from NW 39th Avenue, which intersects with Interstate 75 just southwest of the site. NW 95th Boulevard is a northwest-southeast oriented, two-lane paved road (one traffic lane in each direction) with a current estimated LOS rating of B or better. NW 92nd Court is currently a north-south oriented, short, three to four-lane paved road (two south-bound traffic lanes and one north-bound traffic lane with associated turn lanes) with a current estimated LOS rating of B or better. NW 39th Avenue is an east-west oriented, four to five-lane paved road (two traffic lanes in each direction with associated turn lanes) with a current estimated LOS rating of C or better. NW 95th Boulevard intersects with NW 39th Avenue near the southeastern portion of Site 2 and is unsignalized. NW

¹ **Level of Service** – LOS represents a set of qualitative descriptions of a transportation system's performance. The Federal Highway Administration Highway Capacity Manual defines levels of service for intersections and highway segments, with ratings that range from A (best) to F (worst). Generally, a LOS of D or higher is considered acceptable by transportation planning agencies.

92nd Court intersects with NW 39th Avenue approximately 400 feet south and east of Site 2 and is fully signalized with dedicated turn lanes in all directions. According to FLDOT, the 2018 AADT for NW 95th Boulevard in the vicinity of Site 2 was 2,000 vehicles, AADT for NW 92nd Court in the vicinity of Site 2 was not available, and the 2018 AADT data for NW 39th Avenue in the vicinity of Site 2 was 31,500 vehicles. Roads near Site 2 are illustrated on Figures 4, 5, and 34. Refer to Table 6 for roadway information for Site 2.

Type	Route	Direction	Site	Road Width (feet)	Lanes	Average Daily Traffic (year)	Estimated Level of Service
Major Arterial	NW 39 th Avenue	East-West	Site 2	85	4 to 5	31,500 (2018)	C or better
Access Road	NW 95 th Boulevard	Northwest-Southeast	Site 2	30	2	2,000 (2018)	B or better
Future Major Arterial	NW 92 nd Court	North-South	Site 2	75	3 to 4	N/A	B or better

AAADT Data Source: FLDOT
 Additional Data Source: TTL Site Reconnaissance, June 25, 2019.
 N/A – Not Available

Site 3

Access to Site 3 is provided via NW 55th Boulevard from NW 34th Street and NW 53rd Avenue. NW 55th Boulevard is a northwest-southeast oriented, two-lane paved road (one traffic lane in each direction) with a current estimated LOS rating of B or better. NW 34th Street is a generally north-south oriented, two to four-lane paved road (one traffic lane in each direction with associated turn lanes) with a current estimated LOS rating of B or better. NW 53rd Avenue is an east-west oriented, two to four-lane paved road (one traffic lane in each direction with associated turn lanes) with a current estimated LOS rating of B or better. NW 55th Boulevard intersects with NW 34th Street approximately 220 feet northwest of Site 3; the intersection is unsignalized. According to FLDOT, the 2018 AADT for NW 53rd Avenue in the vicinity of Site 3 was 14,500 vehicles, the 2018 AADT for NW 34th Street in the vicinity of Site 3 was 10,500 vehicles, and AADT for NW 55th Boulevard is not available. Roads near Site 3 are illustrated on Figures 6, 7, and 35. Refer to Table 7 for roadway information for Site 3.

Type	Route	Direction	Site	Road Width (feet)	Lanes	Average Daily Traffic (year)	Estimated Level of Service
Residential Collector	NW 55 th Boulevard	Northwest-Southeast	Site 3	25 to 50	2	N/A	B or better
Major Arterial	NW 34 th Street	North-South	Site 3	40	2 to 4	10,500 (2018)	B or better
Major Arterial	NW 53 rd Avenue	East-West	Site 3	45 to 65	2 to 4	14,500 (2018)	B or better

AAADT Data Source: FLDOT
 Additional Data Source: TTL Site Reconnaissance, June 25, 2019.
 N/A – Not Available

Site 4

Access to Site 4 is provided via SW 26th Place from SW 75th Street/Tower Road, and from SW 24th Avenue. SW 26th Place is a north-south oriented, two-lane paved access road. SW 75th Street/Tower Road is a north-south oriented, two to four-lane paved road (one traffic lane in each direction with associated turn lanes) with a current estimated LOS rating of B or better. SW 24th Avenue is an east-west oriented, two to four-lane paved road (one traffic lane in each direction with associated turn lanes) with a current estimated LOS rating of B or better. SW 26th Place intersects with SW 75th Street/Tower Road approximately 50 feet west of Site 4 and is unsignalized. SW 75th Street/Tower Road intersects with SW 24th Avenue approximately 400 feet northwest of Site 4 and is fully signalized with dedicated turn lanes in all directions. According to FLDOT, the 2018 AADT for SW 24th Avenue in the vicinity of Site 4 was 19,500 vehicles and the 2018 AADT for SW 75th Street/Tower Road in the vicinity of Site 4 was 15,000 vehicles. Roads near Site 4 are illustrated on Figures 8, 9, and 36. Refer to Table 8 for roadway information for Site 4.

Type	Route	Direction	Site	Road Width (feet)	Lanes	Average Daily Traffic (year)	Estimated Level of Service
Access Drive	SW 26 th Place	North-South	Site 4	20	2	N/A	B or better
Minor Arterial	SW 75 th Street/Tower Road	North-South	Site 4	45 to 50	2 to 4	15,000 (2018)	B or better
Minor Arterial	SW 24 th Avenue	East-West	Site 4	45 to 55	2 to 4	19,500 (2018)	B or better
AADT Data Source: FLDOT Additional Data Source: TTL Site Reconnaissance, June 25, 2019. N/A – Not Available							



**FIGURE 33
SITE 1
FLORIDA DOT AADT MAP**

ENVIRONMENTAL ASSESSMENT
PROPOSED OPC AND MHC
ALACHUA COUNTY, FLORIDA

PREPARED FOR

**U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, DC**

TTL PROJECT NO.
1817601





<p>FIGURE 34 SITE 2 FLORIDA DOT AADT MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p> 



FIGURE 35
SITE 3
FLORIDA DOT AADT MAP

ENVIRONMENTAL ASSESSMENT
 PROPOSED OPC AND MHC
 ALACHUA COUNTY, FLORIDA

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, DC

TTL PROJECT NO.
 1817601





<p>FIGURE 36 SITE 4 FLORIDA DOT AADT MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED OPC AND MHC ALACHUA COUNTY, FLORIDA</p>	<p>TTL PROJECT NO. 1817601</p>	 <p>TTL associates inc Environmental, Geotechnical Engineering & Testing</p>

3.14.1 Effects of the Action Alternatives

The Proposed Action could have short-term and long-term, direct and indirect, transportation impacts. Construction traffic, consisting of trucks, workers' personal vehicles, and construction equipment, would increase traffic volumes in the local area, and could cause delays if this occurred during morning and evening peak periods. Installation and connection of utilities, located within or adjacent to the site could also impact local roadways. These activities could result in additional traffic congestion, as well as a potential need to detour traffic around the area during utility work.

During operation, public roadways in the vicinity of the proposed OPC and MHC would experience traffic as a result of usage of these new facilities. As described in Section 2.2, the OPC and MHC would be used Monday through Friday except on federal holidays, and would operate from 7:00 am to 5:00 pm. The OPC would experience approximately 500 Veteran, staff, volunteer and other visitor vehicle stops on an average, daily basis, generating a total of approximately 500 round-trip vehicle trips per day (1,000 one-way vehicle trips per day). The MHC would experience approximately 300 Veteran, staff, volunteer and other visitor vehicle stops on an average, daily basis, generating a total of approximately 300 round-trip vehicle trips per day (600 one-way vehicle trips per day). Given the proposed operational use, traffic generated by the Proposed Action would occur throughout the day, Monday through Friday. Patients of the OPC and MHC would travel at various times during the day during daylight hours. Staff at the OPC and MHC would commute to and from work at peak travel hours (7:00 am and 5:00 pm).

Traffic associated with the proposed OPC and MHC at the selected site(s) would be new to the local area, because the Veterans who would be served by the OPC and MHC (and the associated staff) currently use the existing Gainesville VAMC and the two leased mental health facilities. The Proposed Action would result in a reduction in VA traffic near the existing facilities and an increase in traffic near the selected OPC and MHC site(s). Overall, miles driven by Veterans and staff would be similar to existing conditions.

The Proposed Action would have no adverse impacts on parking. The OPC and MHC developments would include on-site parking (approximately 500 spaces and 300 spaces, respectively) adequate to accommodate the projected needs of Veterans and VA staff using the proposed OPC and MHC.

Site 1

Primary and secondary access to the OPC and/or MHC at Site 1 would be provided by SW 34th Street. The estimated traffic associated with the proposed OPC and MHC (1,600 one-way vehicle trips/day combined for the two clinics) would be an increase of 5.4 percent on SW Williston Road and 40 percent on SW 34th Street. VA's NEPA regulations (38 CFR 26(26.6(a)2)(ii)) define a potential significant traffic impact as "an increase in average daily traffic volume of at least 20 percent on access roads to the site or the major roadway network." The anticipated increased traffic on SW Williston Road is below the 20 percent threshold that indicates a potential significant traffic impact and SW Williston Road currently operates at a good LOS (estimated C or better). As such, transportation impacts on SW Williston Road are anticipated to be less than significant.

Although the estimated increase in traffic on SW 34th Street from both clinics would exceed 20 percent, it is minimally used and currently operates (estimated LOS B or better) well below its

designed capacity, and would likely be able to accommodate the traffic increase associated with the proposed OPC and MHC. As such, transportation impacts on SW 34th Street are anticipated to be less than significant.

Site 2

Primary and secondary access to the OPC and/or MHC at Site 2 would be provided by a new access road associated with the planned 390-acre Springhills development from NW 92nd Court. No direct access to the OPC and MHC would be available from NW 95th Boulevard. The estimated traffic associated with the proposed OPC and MHC (1,600 one-way vehicle trips/day combined) would be an increase of 5.1 percent on NW 39th Avenue, below the 20 percent threshold that indicates a potential significant traffic impact. In addition, NW 39th Avenue currently operates at a good LOS (estimated C or better). As such, transportation impacts on NW 39th Avenue are anticipated to be less than significant.

Although the increase in traffic on NW 92nd Court would likely exceed 20 percent, it is minimally used and currently operates well below its designed capacity. NW 92nd Court was designed for the planned expanded development along NW 92nd Court, north of NW 39th Avenue, and would likely be able to fully accommodate the traffic increase associated with the proposed OPC and MHC. As such, transportation impacts on NW 92nd Court are anticipated to be less than significant.

Site 3

Primary access to the OPC or MHC at Site 3 would be provided from NW 53rd Avenue, with secondary access from NW 55th Boulevard. The estimated traffic associated with the proposed OPC (1,000 one-way vehicle trips/day) or MHC (600 one-way vehicle trips/day) would be an increase of approximately 11 percent or 4.1 percent, respectively, on NW 53rd Avenue, below the 20 percent threshold that indicates a potential significant traffic impact. In addition, NW 53rd Avenue currently operates at a good LOS (estimated B or better). As such, transportation impacts on NW 53rd Avenue are anticipated to be less than significant.

Although there would be an increase traffic on NW 55th Boulevard with its use as secondary access to the proposed OPC or MHC at Site 3, it would likely be lightly used and would likely be able to accommodate the traffic increase. As such, transportation impacts on NW 55th Boulevard are anticipated to be less than significant.

Site 4

It is anticipated that access to the MHC at Site 4 would be provided approximately equally from SW 24th Avenue and SW 75th Street/Tower Road. SW 26th Place would be removed and reconfigured as part of the MHC development. Evenly divided, the estimated traffic associated with the proposed MHC (600 one-way vehicle trips/day) would be an increase of 1.6 percent on SW 24th Avenue and 2.0 percent on SW 75th Street/Tower Road, well below the 20 percent threshold that indicates a potential significant traffic impact. In addition, SW 24th Avenue and SW 75th Street/Tower Road currently operate at good LOSs (estimated B or better). As such, transportation impacts on SW 24th Avenue and SW 75th Street/Tower Road are anticipated to be less than significant.

All Action Alternatives

The estimated increase in traffic from the proposed OPC and/or MHC developments on the major roads near the Action Alternative sites would be below 20 percent, and roads near the sites currently operate at good LOSs (estimated C or better) and would likely be able to accommodate the traffic increase associated with the proposed OPC and/or MHC. The VA developer(s) would work with Alachua County Engineering and Operations Division, the Gainesville Public Works Department, and FDOT, as applicable, during the OPC and MHC design to identify and implement roadway improvements, such as signalization and turn lanes, as necessary, to ensure that there would be no significant traffic impacts.

3.14.2 Effects of the No Action Alternative

Under the No Action Alternative, no transportation or parking impacts associated with the Proposed Action would occur. However, should the Action Alternative sites ultimately be developed by others, traffic and parking impacts would occur. The type and magnitude of transportation and parking effects would be dependent upon the future use of the sites.

3.15 Utilities

Basic utilities in the vicinities of the Action Alternative sites (water, sewer, natural gas, and electric) are provided by various utility providers. As part of the preparation of this EA, local utility providers were researched and developer provided information was reviewed to determine the availability of required utilities in the vicinity of the Action Alternative sites. Utility providers to the sites were identified as follows:

- **Gainesville Regional Utilities (GRU)** supplies potable water, sanitary sewer, stormwater management sewer services, electricity, and natural gas to the vicinity of each of the Action Alternative sites. Potable water, sanitary sewer, electricity, and natural gas lines are located along the roads near each of the sites.
- Various companies provide telecommunication services to the vicinity of the Action Alternative sites.

3.15.1 Effects of the Action Alternatives

The proposed OPC and MHC would result in an increase in the consumption of utilities, including electricity, natural gas, potable water, and sanitary sewer discharges. All major utility services are available immediately next to or in close proximity to the Action Alternative sites. On-site stormwater retention, as discussed in Section 3.6, would also be required for the Proposed Action.

The proposed OPC and MHC are not anticipated to require extraordinary utility services beyond those of a similarly sized light industrial/commercial operation. Based on preliminary design information provided by the prospective developers, adequate utilities likely exist to supply the facilities as currently proposed. However, each utility provider would require a review of the detailed final design plans to validate these preliminary findings and to determine connection/extension requirements to service the proposed OPC and MHC. No significant utility impacts are anticipated.

VA's closure of the existing leased mental health clinics would have negligible utility impacts.

3.15.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA's selected developer(s) would occur and there would be no utility impacts by VA. However, should the Action Alternative sites ultimately be developed by others, impacts similar to those identified under the Proposed Action could occur. The type and magnitude of utility effects would be dependent upon the future use of the Action Alternative sites.

3.16 Environmental Justice

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued to focus attention of federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed.

According to the USEPA-developed EJSCREEN (an environmental justice mapping and screening internet application), Site 4 is located in an area with a higher minority population (52 percent) than the State of Florida as a whole (44 percent). Sites 1 and 4 are located in areas with higher low-income populations (63 percent and 40 percent, respectively) than the State of Florida as a whole (37 percent). Sites 2 and 3 are not located in areas with disproportionately high minority or low-income populations relative to the remainder of Florida.

3.16.1 Effects of the Action Alternatives

The Proposed Action would have negligible environmental justice effects. Although Action Alternative Sites 1 and 4 are located in areas with a larger than average minority population and/or a larger than average low-income population, the Proposed Action would have very little impacts on the residents in the area. During construction, effects on nearby residential land uses, such as through noise and dust, would be limited and controlled through BMPs, thereby minimizing adverse effects to populations within the ROI.

Proposed Action construction activities are anticipated to have a short-term beneficial socioeconomic (and environmental justice) effect on the local employment and personal income in the ROI, as described in Section 3.11.

3.16.2 Effects of the No Action Alternative

Under the No Action Alternative, no development by VA's selected developer(s) would occur at the Action Alternative sites and there would be no direct environmental justice effect by VA. However, Veterans in the Gainesville area, including low-income and minority populations, would continue to be served by undersized, inadequate VA outpatient health care facilities.

If Sites 1 and 4 were to be developed by others, there could be adverse environmental justice effects, depending on the use of the sites.

3.17 Cumulative Impacts

The CEQ regulations define cumulative impacts as those which “result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions” (40 CFR 1508.7). Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions before, during, or after the Proposed Action in the same geographic area. Because of extensive influences of multiple forces, cumulative effects are the most difficult to analyze.

3.17.1 Effects of the Action Alternatives

Site 1

Site 1 is located in a suburban area 4.25 miles southwest of the center of the City of Gainesville in an unincorporated area of Alachua County. The ROI for Site 1 is a mix of undeveloped land (east, south, and west) and developed commercial properties (north, west, and southwest). The area north of Williston Road, located within the City of Gainesville, has been mostly developed for the past 15 years with little remaining space for additional development. Further potential development on the undeveloped land to the south and east in the Site 1 area is possible; however, these undeveloped lands are part of the ISSSA and/or Serenola Forest Strategic Ecosystem and have development restrictions. Although additional development is possible in these areas, it would likely be less intensive than other development in the area.

Site 2

Site 2 is located in a suburban area approximately 7.75 miles west-northwest of the center of the City of Gainesville in an unincorporated area of Alachua County. The ROI for the Site 2 is a mix of undeveloped land (north and west), developed commercial properties (east, south, and west), and Interstate 75 (southwest). NW 92nd Court was constructed and commercial development began east of Site 2 in the early 2000s. Site 2 is located in the southern portion of the 390-acre planned Springhill Traditional Neighborhood Development/Transit Oriented Development, a mixed residential and non-residential development. No development has yet begun in this area, but it is likely that this area will be developed in phases, in the future. No specific development plans were identified.

Site 3

Site 3 is located in a suburban area approximately four miles northwest of the center of the City of Gainesville, within the City of Gainesville. The ROI for Site 3 is mostly developed with residential properties with little vacant land left for further potential development. No other development plans were identified for the Site 3 area.

Site 4

Site 4 is located in a suburban area approximately six miles west-southwest of the center of the City of Gainesville in an unincorporated area of Alachua County. The ROI for the Site 4 is almost fully developed with residential and commercial properties with little vacant land left for further

potential development. No other development plans were identified for the Site 4 area.

The Proposed Action would result in impacts to the area as identified throughout Section 3. These include short-term and/or long-term potential adverse impacts to aesthetics (Sites 1, 3, and 4), air quality, cultural resources (Sites 1,3, and 4), soil and geology, hydrology and water quality (Sites 1 and 2), wildlife and habitat (Sites 1, 2, and 4), noise (Sites 3 and 4), land use (Site 3), wetlands (Sites 1, 2, and 4), floodplains (Site 4), solid waste and hazardous materials, and transportation. All of these impacts are less than significant and would be further reduced through careful coordination and implementation of general BMPs and management measures, and compliance with regulatory requirements, as identified in Section 5. NHPA mitigation may be required for potential cultural resources impacts, if NRHP-eligible archaeological resources are identified that would be affected by the Proposed Action; however, NHPA mitigation in consultation with Florida SHPO, NCHP and other interested parties would result in less-than-significant impacts. Given the nature of the Proposed Action and the potential other development in the Action Alternative site areas, no significant cumulative adverse effects to any of these resource areas are anticipated. Other potential development in the area of the selected site(s) would be subject to zoning requirements and site plan approval by Alachua County or the City of Gainesville, as applicable, which would serve to maintain and control regional, potentially cumulative impacts.

No significant adverse cumulative impacts to the environment, induced by the Proposed Action, are anticipated within the region. Close coordination between the federal and state agencies, Alachua County (Sites 1, 2, and 4), the City of Gainesville (Site 3), and community representatives would serve to manage and control cumulative effects within the region, including managing regional transportation increases with adequate infrastructure. Implementation of local land use and resource management plans would serve to control the extent of environmental impacts, and continued planning would ensure future socioeconomic conditions maintain the quality of life the area's residents currently enjoy. Implementation of effective resource management plans and programs should minimize or eliminate any potential cumulative degradation of the natural ecosystem, cultural, or human environment within the ROI of the Proposed Action.

3.17.2 Effects of the No Action Alternative

Under the No Action Alternative, cumulative impacts would be similar to those identified for the Proposed Action, as the Action Alternative sites would likely be developed for other commercial or residential use. The extent of cumulative effects under the No Action Alternative would depend upon that future use. However, cumulative impacts would not likely be significant, as any new development would be subject to zoning requirements and site plan approval.

3.18 Potential for Generating Substantial Public Controversy

As discussed in Section 4, VA has solicited input from various federal, state, and local government agencies regarding the Proposed Action. Several of these agencies have provided input; none of the input has identified opposition or controversy related to the Proposed Action or the Action Alternatives. VA is publishing and distributing this Draft EA for a 30-day public comment period. Public comments will be considered and addressed in the Final EA.

SECTION 4: PUBLIC INVOLVEMENT

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by the VA NEPA regulations (38 CFR Part 26). Additional guidance is provided in VA's NEPA Interim Guidance for Projects (VA 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as minority, low-income, and disadvantaged persons, are urged to participate. A record of agency coordination and public involvement associated with this EA is provided in Appendix A and Appendix E.

4.1 Agency Coordination

Agencies consulted for this EA include:

- U.S. Fish and Wildlife Service
- U.S. Environmental Protection Agency
- U.S. Army Corps of Engineers
- U.S. Department of Agriculture Natural Resource Conservation Service
- Florida Fish and Wildlife Conservation Commission
- Florida Department of Environmental Protection (various divisions)
- Florida Department of Transportation
- Florida Department of Agriculture and Consumer Services
- Florida Natural Areas Inventory
- St. Johns River Water Management District
- Alachua County (various divisions)
- City of Gainesville (various departments)

VA initially mailed NEPA scoping letters to these agencies on May 8, 2019, regarding the proposed OPC development on Sites 1-3. VA later determined that the smaller proposed MHC also required an EA. On July 2, 2019, VA mailed and emailed a second scoping letter regarding the proposed MHC development on Sites 1-4 to those agencies that responded to the original scoping letter.

Responses were received from USEPA, USFWS, FFWCC, FNAI, FDEP-Florida State Clearinghouse (FSCH), Florida SHPO, SJRWMD, and various Alachua County agencies. Input provided by these agencies is addressed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix A. The following summarizes that input, which VA used to focus this EA's analysis:

General Responses/All Action Alternative Sites

- **USEPA** stated that Sites 1-3 are located in areas containing freshwater emergent-nontidal wetlands and floodplains. USEPA indicated the Proposed Action should avoid and minimize, to the maximum extent practicable, placement of fill into jurisdictional Waters of the U.S. The USEPA also recommended that the Proposed Action include stormwater collection and treatment mechanisms design to protect the function of surrounding wetlands and surface water, and BMPs to prevent or reduce soil erosion into surface waters and minimize adverse soil impacts.

USEPA also stated that Alachua County contains federally protected threatened and endangered species and recommended consultation with USFWS if the Proposed Action may affect these protected species.

- **USFWS** stated that the Action Alternatives are not likely to adversely affect resources protected by the Endangered Species Act.
- **ACEPD Petroleum Programs** stated that state petroleum storage tank registration and petroleum cleanup databases indicate no history of petroleum storage, usage, discharges, cleanup activities, or related issues on the Action Alternative sites.
- **ACGMD** stated that applications for land use change, zoning change, and development approval are required to submit an inventory of natural resources information and provided an Environmental Resources Assessment (ERA) checklist. ACGMD also provided environmental information regarding each site.
- **ACEPD Hazardous Materials Program** stated that they do not have any hazardous materials records associated with Sites 1, 3 or 4. Information provided for Site 2 is discussed below.
- **FNAI** stated that after review of the Action Alternative sites, a FNAI Standard Data Report is not required; however, the eastern portion of Site 2 may slightly overlap or fall adjacent to a single 2004 occurrence of a juvenile eastern indigo snake (federally listed as threatened).
- **FSCH** stated the FDEP Air Section should be contacted to request a review of the project to determine whether an air permit is required for burning the land clearing debris. FDEP also stated that the developer is required to provide prior notification of the installation of petroleum storage tank systems (ASTs and USTs), and the storage tank system equipment must be approved by FDEP. FDEP also stated that review by SJRWMD environmental resource permitting program is required for the Proposed Action.

FSCH stated that based on the information submitted and the minimal project impacts, the State of Florida has no objection to the use of federal funds for the Proposed Action and; therefore, the funding award for the Proposed Action is consistent with the Florida Coastal Management Program (FCMP). FSCH stated that the state's final concurrence with the FCMP will be determined during any environmental permitting process.

Site 1

- **ACGMD** stated that Site 1 was formerly a pasture for cattle grazing and is now occupied by regenerated upland hardwood hammock with scattered pines. ACGMD identified Site 1 as part of the ISSSA, which requires an evaluation for the presence of significant upland habitats, and has specific land development requirements. ACGMD stated that nonresidential development within the ISSSA, such as the Proposed Action, must be designed so that the total mass of all buildings, parking and loading areas does not occupy in excess of 50 percent of the Significant Upland Habitat and that the remainder of the Significant Upland Habitat must retain the existing undisturbed vegetation. ACGMD noted that Site 1 contains several large trees that would require protection or mitigation, if removed. ACGMD stated that Site 1 is located adjoining to, but not within, the designated Serenola Forest Strategic Ecosystem and further stated that due to the potential presence of Significant Upland Habitat at the site, the adjoining proximity of the designated Serenola Forest Strategic Ecosystem could be a factor in the evaluation of where habitat protection may be designated to achieve the preservation requirements of the ISSSA. ACGMD indicated that the south adjoining SW 56th Street is a designated Scenic Road and stated that roads with this designation and areas within 100 feet of the associated right-of-way may have specific development requirements. The ACGMD identified an isolated forested wetland and associated floodplain adjoining to the east of Site 1 and stated that development would be required to follow the wetland and surface water buffer requirements of the ACULDC. In addition, the ACGMD stated that the isolated wetland may represent a sinkhole.
- **FFWCC** stated that Site 1 has the potential habitat to support the presence of the federally listed as threatened eastern indigo snake and the Florida black bear. FFWCC indicated Site 1 is located within the Central Bear Management Unit and Florida black bears are abundant in the area. FFWCC recommended coordinating with USFWS North Florida Ecological Services Office for federally listed species and taking measures during the implementation of the Proposed Action to prevent or reduce conflicts with bears.
- **Florida SHPO** indicated the project area for Site 1 has never been surveyed for archaeological and historic sites and conditions in the area are favorable for the presence of these kinds of resources. Florida SHPO recommended that Site 1 be subjected to a professional cultural resources assessment survey. An archaeological survey of Site 1 is being conducted.
- **SJRWMD** stated that a proposed stormwater management system at Site 1 must meet the conditions for issuance and must also meet the Sensitive Karst Areas Hydrologic Basin criteria. SJRWMD also stated that a field review would be necessary to determine if wetlands or surface waters exist on Site 1. SJRWMD did not identify information pertaining to existing wells on Site 1.

Site 2

- **ACGMD** stated that Site 2 is occupied by a grassy field (northern portion), a pine plantation (southwestern portion), and scattered upland hardwood hammocks (east-central, north-central and northeastern portions). ACGMD indicated that Site 2 is part of the 390-acre Springhills Transit Oriented and Traditional Neighborhood Development (TND/TOD). ACGMD stated that there are two isolated wetlands and associated floodplains in the southeastern portion of Site 2 that are associated with sinkholes and the northern portion of Site 2 is designated as a karst-sensitive area. ACGMD stated that the identified wetlands and associated buffers are already designated as a Conservation Management Area (CMA) associated with the Springhills TND/TOD. ACGMD stated that due to the sinkholes and sensitive karst areas at Site 2, the area is listed as a moderate aquifer recharge zone with a vulnerable aquifer assessment rating. The ACGMD stated gopher tortoises have the potential to be in the Site 2 area; however, no gopher tortoise burrows were identified during a study of the Springhills TNT/TOD project area and no gopher tortoise burrows were observed at the site by ACGMD. ACGMD indicated Site 2 is not located within a designated Special Area Study or Strategic Ecosystem area and there are no vegetative communities at the site that would be considered significant habitat.
- **FFWCC** stated that Site 2 has the potential habitat to support the presence of the federally listed threatened eastern indigo snake, the state-listed threatened southeastern American kestrel, and the state-listed threatened gopher tortoise. The FFWCC recommended coordinating with USFWS North Florida Ecological Services Office for federally listed species, conducting a southeastern American kestrel survey during their nesting season (April to August) within suitable habitat areas, and following FFWCC's Gopher Tortoise Permitting Guidelines (Revised January 2017) for survey methodology and permitting guidance prior to any development activity.
- **Florida SHPO** indicated the project area for Site 2 was previously surveyed for archaeological and historic sites with no identified resources determined to be eligible for listing in the NRHP. No additional cultural resources assessment survey of Site 2 was recommended by Florida SHPO; however, Florida SHPO stated that measures should be taken to address unexpected finds during construction if the Proposed Action is implemented at Site 2.
- The **ACEPD** Hazardous Materials Program indicated the eastern portion of Site 2 includes Haufler Farms, a site with an Early Detection Incentive (EDI) Program notice filed in 1988. However, FDEP determined contamination could not be verified and the site was closed in 1989. Records provided by ACEPD indicate that four small (550-gallon) underground storage tanks (USTs) and a small (260-gallon) aboveground storage tank containing leaded gasoline and diesel had been located off-site near the northeastern corner of Site 2 and removed with no identified below ground contamination associated with the tanks. The EDI Notification Application was associated with overfilling, if any. The EDI Notification Application appears to have been filed for the purpose of obtaining State of Florida funds to complete remediation of the USTs, if needed. FDEP inspected the property and reviewed available information, identified no contamination, and determined no cleanup was required.
- **SJRWMD** stated that a proposed stormwater management system at Site 2 must meet the conditions for issuance and must also meet the Sensitive Karst Areas Hydrologic Basin

criteria. The SJRWMD stated that a Formal Wetlands Determination (FWD) for Site 2 was issued in November 2011 and expired in November 2016. SJRWMD stated that since the FWD has expired, a field review would be necessary to determine if wetlands or surface waters exist on Site 2. The SJRWMD did not identify information pertaining to existing wells on Site 2.

Site 3

- **ACGMD** stated that Site 3 is occupied by an established pine plantation. According to ACGMD, three small potential wetland areas (each approximately 0.04 acres in size) were recently delineated with flagging tape on the western portion of Site 3. According to the ACGMD, these areas were evaluated and found not to have sufficient hydrophytic vegetative, hydric soil or hydrologic indicators to be classified as wetlands. ACGMD stated that the soils at Site 3 have a high water table depth and confining clays that generally require stormwater treatment designs utilizing wet detention basins. ACGMD stated that Site 3 is listed as a moderate aquifer recharge zone with a lower vulnerability aquifer assessment rating. Site 3 is not located within a designated Special Area Study or Strategic Ecosystem area and there are no vegetative communities at the site that would be considered significant habitat.
- **FFWCC** stated that no protected species occurrences were identified within 0.5 miles of Site 3.
- **Florida SHPO** indicated the project area for Site 3 has never been surveyed for archaeological and historic sites and conditions in the area are favorable for the presence of these kinds of resources. Florida SHPO recommended that Site 3 be subjected to a professional cultural resources assessment survey. An archaeological survey of Site 3 is being conducted.
- **SJRWMD** stated that a proposed stormwater management system at Site 3 must meet the conditions for issuance, but would not need to meet the Sensitive Karst Areas Hydrologic Basin criteria, as Site 3 is not located within a Sensitive Hydrologic Basin. SJRWMD stated that a field review would be necessary to determine if wetlands or surface waters exist on Site 3. The SJRWMD did not identify information pertaining to existing wells on Site 3.

Site 4

- **ACGMD** stated that Site 4 is occupied primarily by upland mesic hardwood/pine habitat with two roughly graded stormwater basins in the southeastern and north-central portions of the site associated with a previous planned site development plan from 2015. According to ACGMD, the efforts associated with the planned 2015 development plans did not identify any protected species at Site 4 and no wetlands or surface waters are located at the site. The small southwestern portion of the site was noted to be within the 100-year floodplain. ACGMD stated that Site 4 is listed as a moderate aquifer recharge zone with a high vulnerability aquifer assessment rating. ACGMD stated Site 4 is not located within a designated Special Area Study or Strategic Ecosystem area and there are no vegetative communities at the site that would be considered significant habitat.

4.2 Native American Consultation

VA consulted with three federally recognized Native American Tribes as part of this NEPA process, in accordance with 36 CFR 800.2 and EO 13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000. These Tribes, identified as having possible ancestral ties to the area of the Action Alternative sites, were invited by VA to participate in the EA process as Sovereign Nations per EO 13175. Coordination and consultation letters were sent to the Tribes in June 2019. Section 10 contains a list of the Tribes invited to consult. Written correspondence with the Tribes is provided in Appendix B.

A response was received from the Coushatta Tribe of Louisiana, who stated that they do not believe that the Proposed Action would have a negative impact on any archaeological, historic, or cultural resources of the Coushatta people. The Coushatta Tribe requested that they be immediately contacted should inadvertent Native American cultural items be discovered at the selected site. As of the date of this EA, no other Tribal responses have been received.

4.3 Public Review

VA is publishing and distributing this Draft EA for a 30-day public comment period, as announced by a Notice of Availability published in a local newspaper of general circulation (Gainesville Sun). Review copies of the Draft EA are available for public review at a local public library. VA will respond to public comments within the Final EA.

SECTION 5: MANAGEMENT AND MINIMIZATION MEASURES

This section summarizes the management and minimization measures that 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, the VA developer(s) and their construction contractors would implement BMPs and would satisfy all applicable regulatory requirements in association with the design, construction, and operation of the proposed OPC and MHC at the selected Action Alternative site(s). These “management measures” are described in this EA, and are included as components of each of the Action Alternatives. “Management measures” are defined as routine BMPs and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across Florida. In general, implementation of such management measures would maintain impacts at acceptable levels for all resource areas analyzed. These are different from “mitigation measures,” which are defined as project-specific requirements, not routinely implemented as part of development projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

The routine BMPs, management measures, and avoidance measures summarized in Table 9 would be included by VA’s developer(s) in the selected Action Alternative to minimize and maintain adverse effects at less-than-significant levels.

Technical Resource Area	Best Management Practice/Minimization Measure
Aesthetics	Use vegetative buffers to enhance viewscales, particularly near adjacent residential properties (Sites 3 and 4).
	Use shielded, downward-facing outdoor lighting.
	Comply with the applicable ACULDC and/or GCO land development standards for the selected Action Alternative site(s), including the ISSSA requirements (Site 1).
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 demolition/construction activities.
	Stabilize disturbed areas through re-vegetation or mulching if the area would be inactive for several weeks or longer.
	Implement measures to reduce diesel particulate matter (DPM) 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), Alachua County and/or City of Gainesville air quality regulations. Secure any required minor air emissions permits from FDEP, Alachua County and/or the City of Gainesville prior to construction.

Table 9. Best Management Practices and Minimization Measures Incorporated into the Proposed Action	
Technical Resource Area	Best Management Practice/Minimization Measure
Cultural Resources	Complete the required subsurface archaeological testing at Sites 1, 3, and 4 and Section 106 consultation. If archaeological resources eligible for listing on the NRHP are discovered at the selected site(s), VA would enter into a Memorandum of Agreement (MOA) under Section 106 of the National Historic Preservation Act with the Advisory Council on Historic Preservation (ACHP), Florida SHPO, and other interested consulting parties to mitigate the adverse effects under the NHPA.
	Should potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work in the area of the discovery until VA, a qualified archaeologist, Florida SHPO, and the Coushatta Tribe of Louisiana are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s).
Geology, Topography, and Soils	Conduct geotechnical investigations for the OPC and MHC developments at the selected site(s) that include a karst survey. Design and construct the proposed OPC and MHC to avoid any identified karst areas, to ensure the stability of the development, and to reduce potential future sinkhole development.
	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the SJRWMD ERP and the FDEP NPDES permitting processes. Implement effective controls through a site-specific Stormwater Management Plan and Report (SWMPR). 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 SWMPR to protect surface water quality.
Hydrology and Water Quality	Utilize low impact development practices, to the extent practicable, during the OPC and MHC designs.
	Maintain a minimum 50-foot setback from on-site or off-site surface waters and wetlands per the ACULDC (Sites 1 and 2).
	Control soil erosion and sedimentation impacts during construction by complying with the SJRWMD ERP and FDEP NPDES permit.
	Design improvements in accordance with the requirements of EISA Section 438 with respect to stormwater runoff quantity and characteristics.
	Ensure the designs of the OPC and MHC include sufficient on-site stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas.

Table 9. Best Management Practices and Minimization Measures Incorporated into the Proposed Action	
Technical Resource Area	Best Management Practice/Minimization Measure
Wildlife and Habitat	Evaluate the site for Significant Upland Habitat in consultation with Alachua County prior to site design (Site 1).
	Comply with applicable ACULDC land development standards for the selected site, including required buffers for wetlands/surface waters (Sites 1 and 2), Significant Upland Habitat preservation (Site 1), tree preservation, and open spaces.
	Although not anticipated, contact and consult with the USFWS if any eastern indigo snakes are encountered during construction.
	Conduct a preconstruction survey of the selected site within 60 days of construction to determine the potential presence of gopher tortoises. If gopher tortoises are identified, contact the FFWCC to obtain the necessary permit and approval for the relocation of the tortoises (Sites 2 and 4).
	Avoid vegetation clearing construction during the swallow-tailed kite breeding season (early March to late June), if possible. If not possible, clear site only when ready to build, avoid leaving cleared areas with no activity for extended periods of time, and regularly survey piles of construction-related sand for evidence of swallow-tailed kite nests. If swallow-tailed kite nests are identified, then contact FFWCC to obtain the necessary permit and approval for the relocation of any identified swallow-tailed kites.
	Follow management measures provided by the FFWCC to prevent or reduce conflicts with Florida black bears (Site 1).
	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.
Noise	Comply with the noise control provisions of the ACULDC and/or GCO, as applicable, for the selected Action Alternative site(s).
	Coordinate proposed construction activities in advance with nearby sensitive receptors. Let the 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.
	Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 9:00 p.m. (Alachua County) and between 6:00 a.m. and 7:00 p.m. (City of Gainesville) on Monday through Friday, or during normal, weekday, work hours.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Select material transportation routes as far away from sensitive receptors as possible.
	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).	

Table 9. Best Management Practices and Minimization Measures Incorporated into the Proposed Action	
Technical Resource Area	Best Management Practice/Minimization Measure
Land Use	Comply with the applicable zoning regulations and development standards for the selected site(s).
	Health care facilities are not a permitted, special, or accessory use under the current zoning designations (RMF7) for Site 3. Complete a rezoning of Site 3 through the City of Gainesville Planning Department, if selected.
Wetlands, Floodplains, and Coastal Zone Management	Ensure that the Proposed Action design includes sufficient stormwater management so as not to adversely affect the flood elevations or water quantity/quality in downstream receiving waters.
	Complete the site design to maintain an undeveloped buffer around the on-site wetlands (Site 2) and easterly adjacent pond (Site 1) as required under the ACULDC.
	Ensure the site design includes sufficient compensatory storage so that development within the 100-year floodplain (access drive and small amount of parking) does not affect flood elevations, conveyance, or storage on surrounding properties (Site 4).
	Obtain a floodplain development permit from Alachua County, as required (Site 4).
	Coordinate with the FDEP-CMP, as required, to ensure that the Proposed Action is consistent with the CMP's Coastal Zone Management Program.
Socioeconomics	None required.
Community Services	None required.
Solid Waste and Hazardous Materials	Comply with VA Standard Operating Procedures and applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid waste and hazardous materials.
Transportation and Parking	Work with the FLDOT, Alachua County, and the City of Gainesville, as applicable, during the OPC and MHC design to identify and implement roadway improvements, if necessary, such as signalization and turn lanes.
	Coordinate with the FLDOT, Alachua County, and the City of Gainesville, as applicable, to ensure that construction and operational traffic are considered in the planning of future transportation improvements in this vicinity.
	Ensure construction activities do not adversely affect traffic flow on local roadways; construction would be timed to avoid peak travel hours.
	Ensure debris and/or soil is not deposited on local roadways during construction activities.
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.

SECTION 6: SUMMARY AND CONCLUSIONS

This EA evaluates the Proposed Action of VA to establish an approximately 70,849 NUSF, two-story OPC, including required parking (approximately 500 surface parking spaces), and an approximately 39,932 NUSF, one to two-story MHC, including required parking (approximately 300 surface parking spaces) in the Gainesville, Alachua County, Florida area. This EA examines the implementation of the Proposed Action at one of the four Action Alternative sites (co-located OPC and MHC on Sites 1 or 2) or two of the four Action Alternative sites (separate OPC and MHC on Sites 1, 2, 3, and/or 4) and the No Action Alternative. The EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid waste and hazardous materials; transportation and parking; utilities; and environmental justice. Table 10 provides a comparative summary of the potential environmental effects associated with each of the Action Alternatives.

Table 10. Summary of Site Characteristics and Potential Impacts Associated with the Action Alternatives					
Technical Resource Area	Site 1 SW 34th Street/Williston Road Alachua County	Site 2 NW 95th Boulevard Alachua County	Site 3 2100 NW 53rd Avenue Gainesville	Site 4 SW 24th Ave/SW 75th Street Alachua County	No Action Alternative
Aesthetics	<p>Approximately 17 acres of unimproved wooded land. Part of the Idylwild-Serenola Special Study Area. South adjoining SW 56th Street is a designated Scenic Road.</p> <p>Undeveloped and commercial area.</p> <p>Less-than-significant Impact</p>	<p>Approximately 18.6 acres of unimproved grassy and wooded land, with two small wetlands in the southeastern portion, and an abandoned road. Located within a planned 390-acre mixed use development area.</p> <p>Undeveloped and commercial area.</p> <p>No/Negligible Impact</p>	<p>Approximately 8 acres of unimproved wooded land.</p> <p>Predominantly residential area.</p> <p>Less-than-significant Impact</p>	<p>Approximately 8.5 acres of unimproved wooded and grassy land.</p> <p>Residential and commercial area.</p> <p>Less-than-significant Impact</p>	No impacts.
Air Quality	<p>Short-term impacts due to construction dust and particulate matter (managed through BMPs) and long-term due to vehicle emissions.</p> <p>Less-than-significant Impacts</p>				Similar vehicle emissions with current VA facilities.
Cultural Resources	<p>No known NRHP-listed or eligible historic properties present at or near site. In an area favorable for archaeological resources; archaeological investigation is being conducted. If NRHP-eligible resources are encountered that could be impacted, VA would enter into a MOA to mitigate under Section 106 of NHPA.</p> <p>Less-than-significant Impact, with NHPA mitigation, if necessary</p>	<p>No NRHP-listed or eligible historic properties present at or near site. SHPO confirmed no further investigation is necessary.</p> <p>No/Negligible Impact</p>	<p>No known NRHP-listed or eligible historic properties present at or near site. In an area favorable for archaeological resources; archaeological investigation is being conducted. If NRHP-eligible resources are encountered that could be impacted, VA would enter into a MOA to mitigate under Section 106 of NHPA.</p> <p>Less-than-significant Impact, with NHPA mitigation, if necessary</p>	<p>No known NRHP-listed or eligible historic properties present at or near site. In an area favorable for archaeological resources; archaeological investigation is being conducted. If NRHP-eligible resources are encountered that could be impacted, VA would enter into a MOA to mitigate under Section 106 of NHPA.</p> <p>Less-than-significant Impact, with NHPA mitigation, if necessary</p>	No impacts.

Table 10. Summary of Site Characteristics and Potential Impacts Associated with the Action Alternatives					
Technical Resource Area	Site 1 SW 34th Street/Williston Road Alachua County	Site 2 NW 95th Boulevard Alachua County	Site 3 2100 NW 53rd Avenue Gainesville	Site 4 SW 24th Ave/SW 75th Street Alachua County	No Action Alternative
Geology, Topography, and Soils	<p>All sites are mostly level; only minor grading anticipated. All sites are located in an area with karstification. Known and suspected karst conditions identified on or adjacent to Sites 1, 2, and 4, which are located within designated karst-sensitive areas. Site 3 is not located within a designated karst-sensitive area. Geotechnical investigations, including karst surveys, would be conducted for the selected site(s) and associated recommendations would be included in the site development plans. None of the sites contain prime farmland or soils of local importance. Soil erosion and sediment impacts would be managed through BMPs.</p> <p style="text-align: center;">Less-than-significant Impacts</p>				No impacts.
Hydrology and Water Quality	<p>No surface water on the site. A sinkhole pond is located adjoining to east, which is protected through development buffer/setback requirements.</p> <p>Stormwater runoff during construction managed through BMPs. OPC and/or MHC would include on-site stormwater retention.</p> <p style="text-align: center;">Less-than-significant Impact</p>	<p>Two isolated sinkhole ponds/wetlands located in southeastern portion of the site. On-site ponds and buffers are located within a designated conservation management area and protected from development. No other surface waters on or near the site.</p> <p>Stormwater runoff during construction managed through BMPs. OPC and/or MHC would include on-site stormwater retention.</p> <p style="text-align: center;">Less-than-significant Impact</p>	<p>No natural surface waters located on or adjacent to the site. A drainage ditch is located along the western site boundary. Other drains are located off-site to southwest and north.</p> <p>Stormwater runoff during construction managed through BMPs. OPC or MHC would include on-site stormwater retention.</p> <p style="text-align: center;">No/Negligible Impact</p>	<p>No surface waters identified on or near the site.</p> <p>Stormwater runoff during construction managed through BMPs. MHC would include on-site stormwater retention.</p> <p style="text-align: center;">No/Negligible Impact</p>	No impacts.

Table 10. Summary of Site Characteristics and Potential Impacts Associated with the Action Alternatives

Technical Resource Area	Site 1 SW 34 th Street/Williston Road Alachua County	Site 2 NW 95 th Boulevard Alachua County	Site 3 2100 NW 53 rd Avenue Gainesville	Site 4 SW 24 th Ave/SW 75 th Street Alachua County	No Action Alternative
Wildlife and Habitat	<p>Unimproved wooded land. Located within the Idylwild-Serenola Special Study Area (ISSSA) and adjacent to the west of the Serenola Forest Strategic Ecosystem. Site may contain "significant upland habitat" as defined by Alachua County. Site design and development would comply with ISSSA-specific development standards, designed to minimize ecologic impacts.</p> <p>Marginal potential habitat for federally listed threatened eastern indigo snake. No other federally protected or state-protected species likely present or affected. USFWS confirmed federally protected species are not likely to be adversely affected.</p> <p>Potential for Florida black bear contact, managed through FFWCC-recommended BMPs.</p> <p>Less-than-significant impacts</p>	<p>Unimproved grassy and wooded land with two small wetlands in the southeastern portion and an abandoned road. Located within a planned 390-acre mixed use development area.</p> <p>Identified wetlands are located within a conservation management area and protected from development.</p> <p>Marginal potential habitat for federally listed threatened eastern indigo snake and state-listed threatened gopher tortoises. No gopher tortoise burrows were observed at the site. No other federally protected or state-protected species likely present or affected. USFWS confirmed federally protected species are not likely to be adversely affected.</p> <p>Less-than-significant impacts</p>	<p>Unimproved wooded land in an almost fully developed area.</p> <p>No federally protected or state-protected species likely present or affected. USFWS confirmed federally protected species are not likely to be adversely affected. FFWCC did not identify any state-protected species for the site area.</p> <p>No/Negligible Impacts</p>	<p>Unimproved wooded and grassy land in an almost fully developed area.</p> <p>Marginal potential habitat for federally listed threatened eastern indigo snake and state-listed threatened gopher tortoises. No gopher tortoise burrows were observed at the site. No other federally protected or state-protected species likely present or affected. USFWS confirmed federally protected species are not likely to be adversely affected.</p> <p>Less-than-significant impacts</p>	No impacts.

Table 10. Summary of Site Characteristics and Potential Impacts Associated with the Action Alternatives

Technical Resource Area	Site 1 SW 34 th Street/Williston Road Alachua County	Site 2 NW 95 th Boulevard Alachua County	Site 3 2100 NW 53 rd Avenue Gainesville	Site 4 SW 24 th Ave/SW 75 th Street Alachua County	No Action Alternative
Noise	<p>No sensitive noise receptors in the site area.</p> <p>Short-term noise impacts during OPC/MHC development activities controlled through construction BMPs.</p> <p>Operational impacts minor associated with vehicle traffic.</p> <p>No/Negligible Impact</p>	<p>No sensitive noise receptors in the site area.</p> <p>Short-term noise impacts during OPC/MHC development activities controlled through construction BMPs.</p> <p>Operational impacts minor associated with vehicle traffic.</p> <p>No/Negligible Impact</p>	<p>Residences located on adjacent properties.</p> <p>Short-term noise impacts during OPC/MHC development activities controlled through construction BMPs.</p> <p>Operational impacts minor associated with vehicle traffic.</p> <p>Less-than-significant Impact</p>	<p>Residences and senior care facility located on adjacent properties.</p> <p>Short-term noise impacts during MHC development activities controlled through construction BMPs.</p> <p>Operational impacts minor associated with vehicle traffic.</p> <p>Less-than-significant Impacts</p>	No impacts.
Land Use	<p>Site is located in an undeveloped and commercial area.</p> <p>Site is zoned BH, which allows for health care facilities.</p> <p>No/Negligible Impact</p>	<p>Site is located in an undeveloped and commercial area within a planned 390-acre mixed use development.</p> <p>Proposed development areas of the site are zoned BW and BH, which allow for health care facilities.</p> <p>No/Negligible Impact</p>	<p>Site is located in a mostly residential area.</p> <p>Site is zoned RMF7, which does not allow for health care facilities. Rezoning required; City of Gainesville has agreed, in concept, to rezoning.</p> <p>Less-than-significant Impacts</p>	<p>Site is located in a mixed use residential and commercial area. Site is zoned PD, which allows for health care facilities.</p> <p>No/Negligible Impact</p>	No impacts.
Wetlands, Floodplains, and Coastal Zone Management	<p>No wetlands or floodplains located on-site. Isolated sinkhole wetland/pond with associated floodplain adjoining to east, which is protected from development impacts.</p> <p>Located within a coastal zone.</p> <p>Less-than-significant Impact</p>	<p>Two isolated sinkhole wetlands with associated floodplains located in southeast portion of the site, which are protected from development impacts.</p> <p>Located within a coastal zone.</p> <p>Less-than-significant Impact</p>	<p>No wetlands or floodplains located on-site or adjacent properties.</p> <p>Located within a coastal zone.</p> <p>No/Negligible Impact</p>	<p>No wetlands located on-site or adjacent properties. FEMA-designated 100-year floodplain located on southwestern portion would be impacted during development (access road and parking). Compensatory storage would be included in the site design.</p> <p>Located within a coastal zone.</p> <p>Less-than-significant Impact</p>	No impacts.

Table 10. Summary of Site Characteristics and Potential Impacts Associated with the Action Alternatives					
Technical Resource Area	Site 1 SW 34th Street/Williston Road Alachua County	Site 2 NW 95th Boulevard Alachua County	Site 3 2100 NW 53rd Avenue Gainesville	Site 4 SW 24th Ave/SW 75th Street Alachua County	No Action Alternative
Socioeconomics	Minor beneficial impacts to local economy as a result of temporary construction jobs.				Inadequate VA medical facilities – adverse impact to local Veterans.
Community Services	Significant beneficial impact to area Veterans seeking health care services. Community services are provided to the site areas. Proposed OPC and MHC would not put a significant additional load on these services.				No impacts.
Solid Waste and Hazardous Materials	No/Negligible Impact Based on Phase I ESAs, former use of the sites, and/or other available information, no contamination is known or likely to be present on the sites. Potential impacts from petroleum/hazardous substance handling during construction and operation would be managed through standard BMPs and VA SOPs. Less-than-significant Impacts				No impacts.

Table 10. Summary of Site Characteristics and Potential Impacts Associated with the Action Alternatives

Technical Resource Area	Site 1 SW 34 th Street/Williston Road Alachua County	Site 2 NW 95 th Boulevard Alachua County	Site 3 2100 NW 53 rd Avenue Gainesville	Site 4 SW 24 th Ave/SW 75 th Street Alachua County	No Action Alternative
<p>Transportation and Parking</p>	<p>Primary and secondary access to the OPC and/or MHC at Site 1 would be provided by SW 34th Street from SW Williston Road. Additional traffic would be an increase of 5.4 percent on SW Williston Road.</p> <p>Estimated increase in traffic on SW 34th Street would exceed 20 percent; however, it is lightly used and operates (estimated LOS B or better) well below its designed capacity and would likely be able to accommodate the traffic increase associated with the proposed OPC and MHC.</p> <p>VA's developer would work with FLDOT and Alachua County during the OPC and MHC designs to identify and implement transportation improvements, as necessary.</p> <p>Proposed OPC and MHC would include adequate on-site parking.</p> <p>Less-than-significant Impacts</p>	<p>Primary and secondary access to the OPC and/or MHC at Site 2 would be provided by a new access road from NW 92nd Court from NW 39th Avenue. Additional traffic would be an increase of 5.1 percent on NW 39th Avenue.</p> <p>Estimated increase in traffic on NW 92nd Court would likely exceed 20 percent; however, it is minimally used, was designed for the planned expanded development along NW 92nd Court, north of NW 39th Avenue, and would likely be able to accommodate the traffic increase associated with the proposed OPC and MHC.</p> <p>VA's developer would work with FLDOT and Alachua County during the OPC and MHC designs to identify and implement transportation improvements, as necessary.</p> <p>Proposed OPC and MHC would include adequate on-site parking.</p> <p>Less-than-significant Impacts</p>	<p>Primary access to the OPC or MHC at Site 3 would be provided from NW 53rd Avenue, with secondary access from NW 55th Boulevard. Additional traffic would be an increase of 11 percent (OPC) or 4.1 percent (MHC) on NW 53rd Avenue.</p> <p>Although there would be an increase in traffic on NW 55th Boulevard due to its use as secondary access point, it would likely be lightly used and would likely be able to accommodate the traffic increase associated with the proposed OPC or MHC.</p> <p>VA's developer would work with FLDOT and City of Gainesville during the OPC or MHC design to identify and implement transportation improvements, as necessary.</p> <p>Proposed OPC or MHC would include adequate on-site parking.</p> <p>Less-than-significant Impacts</p>	<p>Access to the MHC at Site 4 would be provided approximately equally from SW 24th Avenue and from SW 75th Street/Tower Road. Additional traffic would be an increase of 1.6 percent on SW 24th Avenue and 2.0 percent on SW 75th Street/Tower Road. Small current access road (SW 26th Place) would be removed/reconfigured.</p> <p>VA's developer would work with FLDOT and Alachua County during the MHC design to identify and implement transportation improvements, as necessary.</p> <p>Proposed MHC would include adequate on-site parking.</p> <p>Less-than-significant Impacts</p>	<p>No impacts.</p>
<p>Utilities</p>	<p>Utilities likely adequate for the proposed OPC and/or MHC already located at or near the sites.</p> <p>No/Negligible Impact</p>				<p>No impacts.</p>

Table 10. Summary of Site Characteristics and Potential Impacts Associated with the Action Alternatives					
Technical Resource Area	Site 1 SW 34th Street/Williston Road Alachua County	Site 2 NW 95th Boulevard Alachua County	Site 3 2100 NW 53rd Avenue Gainesville	Site 4 SW 24th Ave/SW 75th Street Alachua County	No Action Alternative
Environmental Justice	<p>Sites 1 and 4 are located in areas with higher than average low-income populations. Site 4 is also located in an area with a higher than average minority population.</p> <p>Proposed Action would have negligible impact on the residents in the selected site area(s). Low-income and minority Veterans would benefit from the proposed OPC and MHC.</p> <p>No/Negligible Impact</p>				No impacts.

SECTION 7: LIST OF PREPARERS

DEPARTMENT OF VETERANS AFFAIRS STAFF

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 Department of Veterans Affairs

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 Senior Historic Preservation Specialist
 CFM, Historic Preservation Office
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TTL ASSOCIATES, INC. (CONSULTANTS)

Name	Role	Degree	Years of Experience
Paul Jackson	Research and Data Gathering, Site Reconnaissance Document Preparation, Affected Environment, Environmental Impact Analysis, and Scoping Coordination	B.A., Biology/English 1992	20
Rob Clark	Project Manager, Technical QA/QC Review, Program Management/Project Coordination	B.S., Aquatic Environments/ Environmental Science, 1985	33

SECTION 8: REFERENCES

- 38 CFR Part 26. Environmental Effects of the Department of Veterans Affairs Actions. 1 July 2008.
- ACGMD 2019. Alachua County Growth Management Department, Veteran's Administration-Proposed Gainesville Outpatient Clinic Summary – Preliminary Natural Resource & Environmental Evaluation Alachua County Environmental Protection Department (June 4, Updated July 12, 2019).
- Alachua County, Florida, 2019.
- Alachua County Environmental Protection Division, Petroleum Programs, provided information in response to NEPA scoping request, 2019.
- Alachua County Environmental Protection Division, Hazardous Materials Program, provided information in response to NEPA scoping request, 2019.
- City of Gainesville, Florida, 2019.
- Clean Air Act of 1970 (42 U.S. Code [USC] 7401 et. seq.; 40 CFR Parts 50-87) Section 176(c).
- Council on Environmental Quality. 40 CFR Parts 1500-1508, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA).
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- EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. 1994.
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- FFWCC 2019. Florida Fish and Wildlife Conservation Commission, provided information in response to NEPA scoping request, 2019.
- Florida SHPO 2019. Florida Department of State, Division of Historical Resources (State Historic Preservation Office), 2019.
- Florida Department of Transportation, 2019.
- Florida Department of Environmental Protection, 2019.
- Florida Department of Agriculture and Consumer Services, 2019.

- FNAI 2019. Florida Natural Areas Inventory, provided information in response to NEPA scoping request, 2019.
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- Partin 2019. Phase I Environmental Site Assessment and Desktop Cultural Resource Assessment Survey, Site 2, The Partin Group, January 7, 2019.
- Row 10 2019a. Initial Cultural Resource Impact Prediction Study for the Proposed Construction and Lease of a VA Clinic at 3901-4129 Northwest 95th Court, Gainesville Area, Alachua County, Florida, Row 10 Historic Preservation Solutions, April 11, 2019.
- Row 10 2019b. Initial Cultural Resource Impact Prediction Study for the Proposed Construction and Lease of a VA Clinic at NW 53rd Avenue and NW 55th Avenue, Gainesville, Alachua County, Florida, Row 10 Historic Preservation Solutions, April 11, 2019.
- Row 10 2019c. Initial Cultural Resource Impact Prediction Study for the Proposed Construction and Lease of a Clinic at SW Williston Road and SW 34th Street, Gainesville Area, Alachua County, Florida, Row 10 Historic Preservation Solutions, April 11, 2019.
- Row 10 2019d. Initial Cultural Resource Impact Prediction Study for the Proposed Construction and Lease of a VA Mental Health Clinic at SW 24th Avenue and SW 75th Street, Gainesville Area, Alachua County, Florida, Row 10 Historic Preservation Solutions, April 11, 2019.
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Other internet searches and data (accessed January - July 2019):

City of Gainesville, Florida: <http://www.cityofgainesville.org/>

Alachua County, Florida: <https://www.alachuacounty.us/Pages/AlachuaCounty.aspx>

Florida Department of Environmental Protection: <https://floridadep.gov/>

Florida Fish and Wildlife Conservation Commission: <https://myfwc.com/>

Florida Department of Agriculture and Consumer Services: <https://www.freshfromflorida.com/>

Florida Department of Transportation: <https://www.fdot.gov/>

Florida Natural Areas Inventory: <https://www.fnai.org/>

St. Johns River Water Management District: <https://www.sjrwmd.com/>

U.S. Army Corps of Engineers: <https://www.usace.army.mil>

National Wetlands Inventory: <https://www.fws.gov/wetlands/Data/mapper.html>

FEMA Flood Hazard Insurance Map: <http://msc.fema.gov/portal>

U.S. Bureau of Census (2000 and 2010 U.S. Census Data): <https://www.census.gov/>

U.S. Department of Agriculture NRCS Web Soil Survey:
<https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

U.S. Environmental Protection Agency: <https://www.epa.gov>

U.S. Fish and Wildlife Service: <https://www.fws.gov>

U.S. Geological Survey: <https://store.usgs.gov/map-locator>

Various mapping tools: www.maps.google.com, www.google.earth.com, etc.

SECTION 9: LIST OF ACRONYMS AND ABBREVIATIONS

ACEOD	Alachua County Engineering and Operations Division	GPD	Gainesville Planning Department
ACEPD	Alachua County Environmental Protection Division	GPWD	Gainesville Public Works Department
ACGMD	Alachua County Growth Management Division	GRTS	Gainesville Regional Transit System
ACHP	Advisory Council on Historic Preservation	GRU	Gainesville Regional Utilities
ACPCLD	Alachua County Parks and Conservation Lands Division	HAP	Hazardous Air Pollutant
ACPWD	Alachua County Public Works Division	IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
AHPA	Archaeological and Historic Preservation Act	LOS	Level of Service
AIRFA	American Indian Religious Freedom Act	MBTA	Migratory Bird Treaty Act
amsl	above mean sea level	NAAQS	National Ambient Air Quality Standards
BEA	Bureau of Economic Analysis	NAGPRA	Native American Graves Protection and Repatriation Act
bgs	Below Ground Surface	NEPA	National Environmental Policy Act of 1969
BMP	Best Management Practice	NESHAP	National Emission Standards for Hazardous Air Pollutants
CAA	Clean Air Act	NHPA	National Historic Preservation Act
CEQ	Council on Environmental Quality	NOA	Notice of Availability
CFR	Code of Federal Regulations	NO _x	Nitrogen Oxides
CMP	Coastal Management Program	NPDES	National Pollution Discharge Elimination System
CWA	Clean Water Act	NPS	National Park Service
CZMA	Coastal Zone Management Act	NRCS	Natural Resources Conservation Service
EA	Environmental Assessment	NRHP	National Register of Historic Places
EIS	Environmental Impact Statement	NWI	National Wetlands Inventory
EO	Executive Order	O ₃	Ozone
ESA	Endangered Species Act	OPC	Outpatient Clinic
FDACS	Florida Department of Agriculture and Consumer Services	Pb	Lead
FDEP	Florida Department of Environmental Protection	PM	Particulate matter
FDOT	Florida Department of Transportation	PM ₁₀	Particulate matter less than or equal to 10 micrometers in aerodynamic size
FEMA	Federal Emergency Management Agency	PM _{2.5}	Particulate matter less than or equal to 2.5 micrometers in aerodynamic size
FFWCC	Florida Fish and Wildlife Conservation Commission	RCRA	Resource Conservation and Recovery Act
FHA	Federal Highway Administration	ROI	Region of Influence
FNAI	Florida Natural Areas Inventory	SCD	Soil Conservation District
FONSI	Finding of No Significant Impact	SIP	State Implementation Plan
FPPA	Farmland Protection Policy Act	SHPO	Florida Department of State – Division of Historic Resources (State Historic Preservation Office)
GCRPA	Gainesville Parks, Recreation, and Cultural Affairs		

SJRWMD	St. Johns River Water Management District
SO ₂	Sulfur dioxide
SRWMD	Suwannee River Water Management District
TPY	Tons per year
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans Affairs

SECTION 10: AGENCIES AND INDIVIDUALS CONSULTED

Agencies Consulted**U.S. Fish and Wildlife Service – Region 4****North Florida Ecological Services Field Office**

7915 Baymeadows Way, Suite 200
Jacksonville, Florida 32256-7517
Phone: (904) 731-3336

U.S. Environmental Protection Agency, Region 4

Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303
Phone: (404) 562-9900

U.S. Army Corps of Engineers**South Atlantic Division – Jacksonville District**

Public Affairs Office
701 San Marco Boulevard
Jacksonville, Florida 32207-0019
Phone: (904) 232-2234

**Florida Fish and Wildlife Conservation Commission –
North Central Region**

3377 East U.S. Highway 90
Lake City, Florida 32055-8795
Phone: (386) 758-0525

Florida Department of Environmental Protection

Office of the Ombudsman and Public Services
Attention: Public Records Custodian
3900 Commonwealth Blvd, Mail Slot 49
Tallahassee, Florida 32399
Phone: (850) 245-2118

**Florida Department of Environmental Protection –
Northeast District**

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Jacksonville, Florida 32256-7590
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**Florida Department of Environmental Protection -
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3900 Commonwealth Boulevard, Mail Slot 235
Tallahassee, Florida 32399-2400
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**Florida Department of Environmental Protection – Water
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**Florida Department of Environmental Protection – Air
Resource Management**

2600 Blair Stone Road, MS 5500
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**Florida Department of Environmental Protection – Waste
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Florida Department of Transportation

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**Florida Department of State
Division of Historical Resources (FL SHPO)**

R. A. Gray Building
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Tallahassee, Florida 32399-0250
Phone: (850) 245-6300

Florida Natural Areas Inventory

1018 Thomasville Road, Suite 200-C
Tallahassee, Florida 32303
Phone: (850) 224-8207

Suwannee River Water Management District

9225 CR 49
Live Oak, Florida 32060
Phone: (386) 362-1101

St. Johns River Water Management District

P.O. Box 1429
Palatka, FL 32178-1429
Phone: (386) 329-4500

USDA Natural Resource Conservation Service

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Alachua County Engineering and Operations Division

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**Alachua County Environmental Protection Division
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**Alachua County Environmental Protection Division
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**Alachua County Environmental Protection Division
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**Alachua County Growth Management Division
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**Alachua County Growth Management Division
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Alachua County Public Works Division

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Gainesville Regional Utilities (GRU)

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Gainesville Parks, Recreation, and Cultural Affairs

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Phone: (352) 334-5067

Gainesville Planning Department

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Gainesville, Florida 32627-0490
Phone: (352) 334-5023

Gainesville Public Works Department

P.O. Box 490, MS 58
Gainesville, Florida 32627
Phone: (352) 334-5070

Gainesville Regional Transit System

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Gainesville, Florida 32601
Phone: (352) 393-7855

Native American Tribes Consulted**Coushatta Tribe of Louisiana**

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Elton, Louisiana 70532

Miccosukee Tribe of Indians of Florida

Mr. Colley Billie, Chairperson
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Tamiami Station
Miami, Florida 33144-0021

The Muscogee (Creek) Nation, Oklahoma

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SECTION 11: LIST OF ENVIRONMENTAL PERMITS REQUIRED

11.1 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:

- Endangered Species Act (ESA) of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Energy Independence Security Act (EISA) 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 13834, *Efficient Federal Operations* (17 May 2018).
- Farmland Protection Policy Act (FPPA) (7 USC 4201, et seq.)
- Federal Clean Air Act (CAA) 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 (NAGPRA) (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- Florida Department of Environmental Protection, National Pollution Discharge Elimination System.
- Florida Department of Environmental Protection, Environmental Resource Permit.

- Florida Administrative Code.
- Florida Building Code.
- Alachua County Unified Land Development Code.
- City of Gainesville Code of Ordinances.

11.2 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 are required as part of this Proposed Action, and include:

All Action Alternative Sites

- Florida Department of Environmental Protection, National Pollution Discharge Elimination System.
- St. Johns River Water Management District, Environmental Resource Permit
- Coastal Zone Management Program Consistency Determination.
- Florida Department of Environmental Protection: Petroleum Storage Tank Systems (ASTs and USTs) Installation Permit.

Site 1

- Alachua County Site Development Permit.

Site 2

- Alachua County Site Development Permit.

Site 3

- City of Gainesville Site Development Permit.

Site 4

- Alachua County Site Development Permit.
- Alachua County Floodplain Development Permit.

SECTION 12: GLOSSARY

100-Year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a one percent chance of it occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient - The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards - Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer - An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Asbestos - Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area - Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Bedrock - The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) - Methods, measures, or practices to prevent or reduce the contributions of pollutants to U.S. waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial land use – Land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals,

clinics, etc.), and military buildings and installations.

Compaction - The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Contaminants - Any physical, chemical, biological, or radiological substances that have an adverse effect on air, water, or soil.

Council on Environmental Quality (CEQ) - An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends, and to appraise programs and activities of the federal government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants - The CAA of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), lead (Pb), nitrogen dioxide (NO₂), and particulate matter.

Cultural Resources - The physical evidence of our Nation's heritage. Included are: archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what

agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Decibel (dB) - A unit of measurement of sound pressure level.

Direct Impact - A direct impact is caused by a Proposed Action and occurs at the same time and place.

Emission - A release of a pollutant.

Endangered Species - Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) - An EA is a publication that provides sufficient evidence and analyses to show whether a proposed system will adversely affect the environment or be environmentally controversial.

Erosion - The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Agricultural land - Cropland, pastures, meadows, and planted woodland.

Fauna - Animal life, especially the animal characteristics of a region, period, or special environment.

Flora - Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain - The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FONSI - Finding of No Significant Impact, a NEPA document.

Fugitive Dust - Particles light enough to be suspended in air, but not captured by a filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed

soils at construction sites.

Geology - Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater - Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance - Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under TSCA.

Any hazardous air pollutant listed under Section 112 of CAA.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a

above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR 302.4.

Hazardous Waste - A solid waste which, when improperly treated, stored, transported, or disposed of, poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR 261.3 or applicable foreign law, rule, or regulation.

Hazardous Waste Storage - As defined in 40 CFR 260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".

Hydric Soil - A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Indirect Impact - An indirect impact is caused by a Proposed Action that occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Isolated Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the Waters of the U.S.

Jurisdictional Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the U.S. These wetlands are regulated by the USACE.

Listed Species - Any plant or animal designated by a state or the federal government as threatened, endangered, special concern, or candidate species.

Mitigation - Measures taken to reduce adverse impacts on the environment.

Gainesville Sources - Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring - A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter, and sulfur dioxide (SO₂).

National Environmental Policy Act (NEPA) - U.S. statute that requires all federal agencies to consider the potential effects of major federal actions on the human and natural environment.

Non-attainment Area - An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more national or state ambient air quality standards.

Parcel - A plot of land, usually a division of a larger area.

Particulates or Particulate Matter - Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic Region - A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant - A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water - Water which is suitable for drinking.

Prime Agricultural land - A special category of highly productive cropland that is recognized and described by the U.S. Department of Agriculture's Natural Resource Conservation Service and receives special protection under the Surface Mining Law.

Remediation - A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas - Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

River Basin - The land area drained by a river and its tributaries.

Sensitive Receptors - Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Significant Impact - According to 40 CFR 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world

as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Small quantity generator - A generator who generates greater than 220 pounds but less than 2,200 pounds of hazardous waste in a calendar month and who does not accumulate more than 13,200 pounds of hazardous waste at any one time (if either threshold is exceeded, the generator becomes a large quantity generator). A small quantity generator may accumulate hazardous waste up to 180 days from the accumulation start date.

Soil - The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste - Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

Threatened species - Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography - The relief features or surface configuration of an area.

Toxic Substance - A harmful substance which includes elements, compounds, mixtures, and materials of complex composition.

Waters of the United States - Include the following: (1) All waters which are currently being used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (2) All interstate waters including interstate wetlands. (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet

meadows, playa lakes, or natural ponds; the use, degradation or destruction of which could affect interstate or foreign commerce.

Watershed - The region draining into a particular stream, river, or entire river system.

Wetlands - Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes, and estuaries.

Wildlife Habitat - Set of living communities in which a wildlife population lives.