
**FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED VA HEALTH CARE CENTER
FREDERICKSBURG, VIRGINIA**

Introduction

A Final Environmental Assessment (EA), included herein by reference, was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) Proposed Action to establish an approximately 426,722-square-foot health care center (HCC) in the Fredericksburg, Virginia, area. The EA was prepared in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26).

The purpose of the Proposed Action is to provide enhanced and expanded primary care, mental health, and specialty care outpatient services to Veterans in the Fredericksburg, Virginia, area in an integrated, right-sized, energy-efficient facility. The proposed HCC would decompress the overcrowded Hunter Holmes McGuire VA Medical Center in Richmond, Virginia (Richmond VAMC), resulting in the improved delivery of health care services by reducing the workload at this facility. The Proposed Action would consolidate and expand outpatient services to Veterans in the region, allowing VA to provide area Veterans timely access to state-of-the-art health care and mental health services in a centralized, appropriately sized, modern facility commensurate with current and projected workloads. The proposed HCC would also facilitate collaboration and sharing of health care services with the Department of Defense.

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 (SCIP) process. The Richmond VAMC is overcrowded and space-constrained and insufficient to meet the current and rapidly growing health care needs of area Veterans. The SCIP process identified an approximately 815,000-square-foot space gap for the Richmond VAMC and its supporting outpatient clinics. In addition, the Richmond and Fredericksburg area is one of the fastest growing markets in the VA health care system. Over the next 20 years, the number of Veterans enrolled is projected to increase more than 44 percent and the outpatient workload is projected to increase more than 71 percent. The two existing VA-leased outpatient clinics in the Fredericksburg area are undersized (total 26,000 square feet) and insufficient to meet the current and projected future health care needs of Veterans in the Fredericksburg area. Further, operating separate VA clinics in the area creates operational inefficiencies, integrates services poorly, and increases costs. In addition, the Richmond VAMC is located more than 50 miles south of Fredericksburg, requiring substantial travel time for Fredericksburg-area Veterans seeking outpatient health care services from the Richmond VAMC.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action is to establish an approximately 426,722- square-foot HCC with approximately 2,600 parking spaces in the Fredericksburg, Virginia, area. Two undersized leased Fredericksburg-area VA clinics would be replaced by the new facility. The proposed HCC would also provide approximately 30,000 square feet of clinical space for the Department of Defense.

Alternatives Considered

VA examined the existing facilities for their potential to support the Proposed Action. The Richmond VAMC is overcrowded and space-constrained with no available space for new construction or expansion and is located more than 50 miles from the Fredericksburg area. The two existing leased Fredericksburg VA clinics cannot be expanded beyond their current sizes. In addition, continued operation of two separate facilities would not enable VA to provide centralized, consolidated health care services. 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 advertised through a Request for Lease Proposals and received three offers within the competitive range for the proposed HCC development at two sites (Gateway Site and Hood Drive Site).

The EA examined in depth three Action Alternatives—the implementation of the Proposed Action at the Gateway Site (Gateway Site A or Gateway Site B) or the Hood Drive Site—and the No Action Alternative.

Action Alternatives

Gateway Site: The Gateway Site consists of approximately 35 acres of land within the 88-acre proposed 1500 Gateway Boulevard Development. The Gateway Site is located along the eastern side of Interstate 95, between Cowan Boulevard and Plank Road, and west of the proposed Gateway Boulevard extension in the City of Fredericksburg. The site is mostly undeveloped woodlands. The site was primarily farmland in the 1960s and 1970s with limited undeveloped woodlands along the eastern and northern boundaries, and has been gradually reforested since the 1980s. Two development plans (offers) are being considered for the Gateway Site:

- **Alternative A: Gateway Site A** – The Gateway Site A Alternative consists of approximately 35 acres. The HCC development would include a three-story HCC building located near the center of the site and approximately 2,600 surface parking spaces located north, east, and south of the HCC building. Site access would be provided by three drives from the proposed Gateway Boulevard extension.
- **Alternative B: Gateway Site B** – The Gateway Site B Alternative consists of approximately 33 acres. The HCC development would include a four-story HCC building located near the center of the site, a two-story parking garage north of the HCC building, and surface parking spaces located north, east, and south of the building. A total of approximately 2,600 parking spaces would be provided. Site access would be provided by three drives from the proposed Gateway Boulevard extension.

Hood Drive Site: The Hood Drive Site consists of approximately 49 acres of land located along the eastern side of Interstate 95, south of Hood Drive, and east of U.S. Route 1 in an unincorporated area of Spotsylvania County. The site is mostly undeveloped, grassy land with small areas of shrubs/trees and a pond. The site includes a small parcel with a house (4708 Hood Drive) that was built in the early 1950s and a small parcel with a vacant gasoline station/convenience store (5313 U.S. Route 1) that was built in the early 1970s. The Hood Drive Site was mostly unimproved farmland with a farmstead in the northeastern portion from at least 1942 to the 1970s. With the exception of the north-central portion, the site gradually became reforested starting in the 1970s and was heavily wooded by 2003. The site was cleared of most of its vegetation between 2005 and 2006 in anticipation of commercial development. Earthwork for the commercial development began in late 2008 and ceased prior to completion in 2009. During that time, the southern portion of the site was heavily disturbed and graded in preparation for development. Since 2009, the majority of the site has gradually become revegetated with grass and shrubs.

- **Alternative C: Hood Drive Site** – The Hood Drive Site Alternative would consist of a four-story HCC building located near the center of the site and approximately 2,600 surface parking spaces

located north, east, south, and west of the HCC building. A stormwater management pond would be located near the southern site boundary. Site access would be provided by two drives from U.S. Route 1 and one drive from Hood Drive. The main access drive would be from U.S. Route 1.

The selected developer would construct the HCC on a build-to-suit basis and then lease the facility to VA for up to 20 years. The developer (lessor) would be responsible to design and construct the facility in compliance with VA design requirements and applicable federal, state, and local regulations. The facility would be staffed by VA, with facility management and maintenance provided by the lessor.

VA anticipates construction of the proposed HCC would begin in 2021 and the new facility would open in 2024 or 2025.

No Action Alternative

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

2. Environmental Analysis

Environmental Consequences

Action Alternatives

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

National Historic Preservation Act (NHPA) compliance and consultation indicates that mitigation would be required for potential cultural resources impacts at the Gateway Site. One archaeological site that represents a Confederate Civil War encampment with a likely artillery position encompasses much of the eastern portion of the Gateway Site (approximately eight acres) and is eligible for listing on the National Register of Historic Places (NRHP). VA has prepared a procedural Programmatic Agreement under Section 106 of the NHPA with the Virginia Department of Historical Resources (Virginia State Historic Preservation Office [SHPO]) that establishes procedures to address potential adverse effects if the Gateway Site is selected for the proposed HCC. If the Gateway Site is selected and adverse effects cannot be avoided, VA would develop and execute a Memorandum of Agreement with appropriate mitigation measures. Mitigation measures may include further exploration for data inventory and recovery, archaeological/historic publications, and/or archaeological monitoring during excavation work associated with the proposed HCC construction. With the completion of these NHPA mitigation measures, cultural resources impacts would be less than significant.

A traffic impact analysis (TIA) for the Hood Drive Site found that the traffic conditions at several the intersections near the site would operate at an unacceptable level of service (LOS) in 2025 without the proposed HCC at this site. Traffic generated by the proposed HCC at the Hood Drive Site would

exacerbate these failing conditions and would cause other intersections to operate at an unacceptable LOS. However, the TIA found that that with the implementation of roadway improvements, the intersections in the vicinity of the Hood Drive Site would operate at an acceptable LOS. If the Hood Drive Site is selected for the proposed HCC, the developer would work with the Spotsylvania County Public Works Department and Virginia Department of Transportation (VDOT), as applicable, during the HCC design to identify and implement roadway improvements to ensure that there would be no significant traffic impacts. Spotsylvania County has committed to funding the necessary local roadway network improvements if the Hood Drive Site is selected for the HCC. The developer would be responsible for funding improvements at the HCC entrance/exit drives.

A TIA for the 88-acre 1500 Gateway Boulevard Development identified several improvements to area roadways and intersections that would be needed to mitigate the traffic impacts from the 1500 Gateway Boulevard Development, including the proposed HCC at the Gateway Site. The identified improvements are planned to be implemented by the City of Fredericksburg, the Gateway Site owner, and/or VDOT, and have been partially funded for implementation. The City of Fredericksburg anticipates VDOT Smart Scale funds will complete the funding for the roadway improvements. The City of Fredericksburg has committed to funding the improvements if Smart Scale funds are not received. The TIA found that with the implementation of the planned improvements, roads and intersections in the site area would operate at an acceptable LOS with the complete 1500 Gateway Boulevard Development, including the proposed HCC at the Gateway Site.

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 HCC be constructed at one 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.

Cumulative Impacts

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

Management, Minimization, and Mitigation Measures

The BMPs, management and minimization measures, project-specific mitigation measures, and regulatory compliance measures summarized in Table 4-1 of the Final EA (attached herein as Appendix A) will be included by the developer in the selected Action Alternative to minimize and maintain adverse effects at less-than-significant levels.

3. Regulations

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

4. Commitment to Implementation

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

5. Agency and Public Involvement

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

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability published in the Free Lance Star, a local newspaper of general circulation, on July 12 and 15, 2020. A copy of the Draft EA was also made available on the Richmond VAMC website.

VA emailed notification of the availability of the Draft EA for review and comment, with a link to the Draft EA on the Richmond VAMC website, to each of the agencies and Tribes that were contacted during the NEPA scoping and Section 106 consultation. Six agencies (a member of the Stafford County Board of Supervisors, Spotsylvania County Department of Economic Development, Virginia Department of Agriculture and Consumer Services, Spotsylvania County Zoning Administrator, Spotsylvania County Administrator, and the Virginia Department of Environmental Quality Office of Local Government Programs) provided comments regarding the Draft EA. The agency comments on the Draft EA were considered in preparing the Final EA, as appropriate.

VA held a virtual public meeting on July 29, 2020, at 6 pm to present a summary of the Draft EA and to receive public input and comment on the Draft EA. Two members of the public attended the public meeting. Public comments on the Draft EA were considered in preparing the Final EA, as appropriate.

6. Finding of No Significant Impact

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

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

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

Technical Resource Area	Measure
Aesthetics	Comply with the development standards of the Fredericksburg Unified Development Ordinance and the Fredericksburg Code of Ordinances (FCO) for the Gateway Site and the Spotsylvania County Code of Ordinances (SCCO) for the Hood Drive Site.
	Use vegetative buffers to enhance viewscales, particularly near adjacent residential properties.
	Use shielded, downward-facing outdoor lighting.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust, palliative, covers, and suspension of earth moving in high wind conditions) during onsite construction activities.
	Stabilize disturbed area through re-vegetation or mulching if the area would be inactive for several weeks or longer.
	Implement measures to reduce diesel particulate matter emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Comply with the applicable VDEQ air quality regulations. Secure any required minor air emissions permits from VDEQ prior to construction.
Cultural and Historic Resources	Implement the procedural Programmatic Agreement (PA) to mitigate the adverse historic property effects to the NRHP-eligible Confederate Civil War encampment and artillery position, if the Gateway Site is selected for the proposed HCC.
	Should potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work in the area until VA, a qualified archaeologist, Virginia SHPO, and other consulting parties are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal laws.
Geology and Soils	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the VDEQ-issued Virginia Pollutant Discharge Elimination System (VPDES) permit, including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). The VPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the VPDES permit and the SWPPP to protect surface water quality.
Hydrology and Water Quality	Control soil erosion and sedimentation impacts during construction by complying with the VDEQ VPDES permit.
	Design improvements in accordance with the requirements of Energy Independence and Security Act Section 438 with respect to stormwater runoff quantity and characteristics.
	Ensure the design of the HCC includes sufficient stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas.
Wildlife and Habitat	Native species should be used to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species.
	For the selected site, the developer would comply with city, county, and/or state regulations and ordinances implementing the CBPA.

Technical Resource Area	Measure
Noise	Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 7:00 p.m. on Monday through Friday, or during normal, weekday, work hours.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Comply with the noise control provisions of the FCO (Gateway Site) and SCCO (Hood Drive Site).
	Coordinate proposed construction activities in advance with nearby sensitive receptors within 500 feet of the selected site. 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.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer’s recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, engine speed restrictions).
Land Use	Comply with the applicable zoning regulations and development standards for the selected site.
Wetlands, Floodplains, and Coastal Zone Management	Obtain a permit from USACE and VDEQ for any filling or taking of wetlands on the Gateway Site. Obtain a jurisdictional determination from the USACE and obtain a permit from USACE and/or VDEQ for any filling or taking of wetlands on the Hood Drive Site. Completed the permit-required mitigation measures.
	Design improvements in accordance with the requirements of Energy Independence and Security Act Section 438 with respect to stormwater runoff quantity and characteristics.
	Developer to coordinate with the VDEQ, as required, to ensure that the Proposed Action is consistent with the VDEQ’s Coastal Zone Management Program.
Socioeconomics	Construction areas would be secured to prevent unauthorized access by children from nearby residential areas.
Community Services	None required.
Solid Waste and Hazardous Materials	Comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid and hazardous materials and medical wastes.
	Prepare a Soil and Groundwater Management Plan to notify construction contractors of the soil and groundwater conditions in the eastern portion of the Hood Drive Site (vacant gasoline station) and ensure proper handling and disposal of impacted groundwater and soil that may be encountered during construction (Hood Drive Site).
	Complete surveys of the Hood Drive Site buildings for ACMs prior to demolition activities. Remove ACMs in accordance with the federal and state requirements prior to demolition activities.

Technical Resource Area	Measure
Traffic, Transportation, and Parking	Work with the City of Fredericksburg and VDOT, as applicable, during the HCC design to identify and implement roadway improvements to address traffic impacts (Gateway Site).
	Work with Spotsylvania County and VDOT, as applicable, during the HCC design to identify and implement roadway improvements to address traffic impacts (Hood Drive Site).
	Complete a traffic signal warrant analysis and submit it for review and approval by VDOT and the City of Fredericksburg for the proposed main entrance drive (Gateway Site).
	Prepare a signal justification report and access management request for the proposed main entrance drive from U.S. Route 1 and submit to VDOT for review and approval by the State Traffic Engineer (Hood Drive Site).
	Ensure debris and/or soil is not deposited on local roadways during the demolition and construction activities.
Utilities	None required.
Environmental Justice	None required.