DRAFT

Environmental Assessment for the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy and Sterile Processing at the Malcom Randall Veterans Affairs Medical Center North Florida/South Georgia Veterans Health Care System Gainesville, FL

VA Project: VHA8-573-2021-43065

FEBRUARY 2023

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

EXECUTIVE SUMMARY AND FINDINGS

The U.S. Department of Veterans Affairs (VA) has prepared a Draft Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code §§ 4321-4370h), as implemented by the Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] §§ 1500-1508); *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26); and VA's *NEPA Interim Guidance for Projects* (VA, 2010)

NEPA requires federal agencies to consider the environmental effects of their proposed actions. The EA evaluates the potential impacts on the human and natural environments resulting from the Proposed Action to correct non-compliant surgical, emergency, pharmacy, and sterile processing services at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), Alachua County, 1601 Southwest (SW) Archer Road, Gainesville, Florida.

The MRVAMC is one of two VAMCs in the North Florida/South Georgia Veterans Health System (NF/SGVHS). Construction of the MRVAMC began in 1964 and the first patients were admitted in 1967. The MRVAMC now provides a full range of comprehensive health care, including primary, specialty, tertiary, and long-term care. It also serves as an active teaching hospital. Between 40,000 and 50,000 outpatient visits are provided each month. Annually, the MRVAMC provides specialty services to 100,000 Veterans and admits 12,000 inpatients.

Under the Proposed Action, the Ambulatory Care Addition (ACA) would be demolished, and its current site would be used to create a new Hospital Services Addition (HSA) at the MRVAMC.

The ***purpose*** of the Proposed Action is to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies. The HSA would supply the required amount of space, create an efficient configuration, and improve communications. The additional space (new and renovated) would correct significant issues in the existing key departments of Surgery, Pharmacy Services (inpatient and outpatient), Emergency Department (ED), Sterile Processing Services (SPS), Surgical Intensive Care Unit (SICU), Office of Information and Technology (OIT), Logistics, Health Administration Services, Prosthetics, Sensory Aid Services, Pathology, and Laboratory Medicine.

The concurrent addition of a new parking garage would increase capacity and reduce patient walking distances to critical services.

The Proposed Action is ***needed*** to bring the MRVAMC services into compliance with current VA facility codes and standard of care practices and to provide the standard of care to Veterans in North Florida and South Georgia required to meet current and future VA strategic goals.

The EA analyzes a single site location covering approximately 10 acres on the western portion of the MRVAMC campus for implementation of the Proposed Action. The Proposed Action would include demolition of the existing ACA and several other buildings currently on the site to accommodate the HSA (approximate 250,000 building gross square feet), a new 500-space parking garage (with a footprint of approximately 60,000 square feet), relocation of major utilities, and relocation of the existing loop road.

The EA also examines a No Action Alternative; a process required under NEPA that serves as the baseline for impact analysis. Under the No Action Alternative, the Proposed Action would not be implemented and existing deficient conditions at the MRVAMC would remain unresolved for the foreseeable future. For this reason, the No Action Alternative does not meet the purpose and need for action and would diminish the level of care that VA is able to provide at the MRVAMC to Veterans in North Florida and South Georgia.

The EA provides VA decision makers the information needed to construct and operate service enhancements at the MRVAMC while minimizing potential adverse impacts to the human and natural environments. Once the Final EA is completed, a conceptual alternative would be selected and refined during a formal design process performed by VA in collaboration with the U.S. Army Corps of Engineers (USACE) and a designated Architect/Engineer of Record (A/E).

The following table summarizes the findings of the environmental analysis of the Proposed Action and the No Action Alternative.

Environmental Resource Topic	Proposed Action	No Action
Aesthetics		
Construction	The Proposed Action is anticipated to have a direct, short-term (though lasting up to years), less-than-significant adverse impact on aesthetics at the MRVAMC. This impact would end once the construction phase is complete.	No impact
Operation	The Proposed Action would have a long-term, direct, minor beneficial impact on aesthetics within the western portion of the MRVAMC. There would be no impacts to aesthetics elsewhere at the MRVAMC.	No impact
Air Quality		
Construction	The Proposed Action would be considered to have a direct, short-term, less-than-significant adverse impact on air quality.	No impact
Operation	The Proposed Action would be considered to have a direct, long-term, less-than-significant adverse impact on air quality.	Direct, long-term, less-than-significant adverse impact on air quality
Cultural and Historic Resources		
Construction and Operation	The Proposed Action would have no impact on cultural and historic resources.	No impact
Geology, Topography, and Soils		
Construction	The Proposed Action would have no impact on geologic resource; and a direct, long-term, negligible adverse impact on topography and soil quality.	No impact

Operation	The Proposed Action would have no impact on geology or topography, and a direct, long-term, negligible adverse impact on soil quality.	No impact
Hydrology and Water Quality		
Construction	The Proposed Action would have a direct, short-term, negligible adverse impact on groundwater quality and a direct, short-term, negligible adverse impact on stormwater quality.	No impact
Operation	The Proposed Action would have no impact on groundwater quality and a direct, long-term, negligible adverse impact on stormwater quality.	No impact
Coastal Zone Management		
Construction and Operation	The Proposed Action would have no impact on Florida's coastal zone resources.	No impact
Noise and Vibration		
Construction	The Proposed Action would have a direct, short-term, less-than-significant adverse impact on noise-sensitive receptors at the MRVAMC and a negligible impact on the surrounding community. The Proposed Action would have a direct, short-term, negligible adverse impact on vibration-sensitive receptors at the MRVAMC and no impact to the surrounding community.	No impact
Operation	The Proposed Action would have a direct, long-term, negligible adverse impact on noise-sensitive receptors at the MRVAMC and no impact on the surrounding community, and no impact on vibration-sensitive receptors at the MRVAMC or in the surrounding community.	No impact
Solid Waste and Hazardous Materials		
Construction	The Proposed Action would have a direct, long term, less-than-significant beneficial impact on RBMs, and a direct, short-term, less-than-significant adverse impact by increasing the volume of waste disposed of at an off-site landfill.	No impact
Operation	The Proposed Action would have a direct, long-term, negligible adverse impact on solid waste and hazardous materials.	No impact
Traffic and Parking		
Construction	The Proposed Action would have no impact on regional transportation, and a direct, short-term, minor adverse impact on MRVAMC traffic and parking.	No impact

Operation	The Proposed Action would have no impact on transportation or traffic conditions within or surrounding the MRVAMC, and a direct, long-term, moderate beneficial impact on parking and pedestrian safety within the MRVAMC.	The current loop road alignment would have a direct, long-term, less-than-significant adverse impact on pedestrian safety within the MRVAMC.
Utilities		
Construction	The Proposed Action would have a direct, short-term, negligible adverse impact on overall utility operations at the MRVAMC and no impact on customers outside of the MRVAMC.	No impact
Operation	The Proposed Action would have a direct, long-term, negligible adverse impact due to the increased consumption of utilities, but no impact on utility service quality within MRVAMC or to customers outside of the MRVAMC	No impact
Community Services		
Construction	The Proposed Action would have a direct, short-term, minor adverse impact on the delivery of medical and administrative support services.	No impact
Operation	The Proposed Action would have a direct, long-term, significant beneficial impact on Veteran's medical services.	Direct, long-term, significant adverse impact
Socioeconomics/ Demographics		
Construction	The Proposed Action would have a direct, short-term, minor beneficial impact on local socioeconomic conditions.	No impact
Operation	The Proposed Action would have a direct and indirect, long-term, negligible beneficial impact on socioeconomic conditions.	No impact
Environmental Justice		
Construction	The Proposed Action overall would not significantly nor disproportionately impact vulnerable populations. However, the direct, short-term, negligible beneficial impact on local socioeconomic conditions in Gainesville and Alachua County on local socioeconomic conditions could positively impact vulnerable populations.	No impact
Operation	The Proposed Action would have a direct and indirect, long-term, negligible beneficial impact on socioeconomic conditions in Gainesville and Alachua County.	No impact

Cumulative Impacts		
Construction and Operation	The Proposed Action would have no significant adverse impacts to the resources analyzed in this EA, and a significant beneficial impact on community services as it relates to Veteran's medical care.	Direct, long-term, significant adverse impact on community services as it relates to Veteran's medical care
Potential for Generating Substantial Controversy		
Construction and Operation	The Proposed Action is not anticipated to generate substantial controversy or lead to negative public reaction because it would bring the MRVAMC services into compliance with current VA facility codes and standard of care practices.	Significant public controversy

During development of the Draft EA, VA published on August 5 and 7, 2022 in *The Gainesville Sun* a Notice of Intent (NOI) to prepare a Draft EA and also posted it on VA's website at https://www.cfm.va.gov/environmental. VA provided instructions on how the public could submit comments to be considered during the NEPA process. On August 4, 2022, VA also mailed letters to Native American Tribes; federal, state, and local regulatory agencies; and elected officials with potential interest in the Proposed Action inviting them to submit any comments on the scope of issues for analysis or relevant information. Relevant comments received during this 30-day period were incorporated in the Draft EA.

VA has published a Notice of Availability (NOA) for the Draft EA announcing the start of the 30-day public review and comment period in *The Gainesville Sun.* VA emailed copies of the NOA to the same Native American Tribes; federal, state, and local regulatory agencies; and elected officials with interest in the Proposed Action.

The Draft EA is available at the Alachua County Library District Headquarters Library at 401 East University Avenue, Gainesville, FL 32601 and electronically via download from VA's website at https://www.cfm.va.gov/environmental. Comments could be submitted to VACOEnvironment@va.gov during the 30-day review period.

Relevant comments on the Draft EA received during the 30-day public comment period will be documented and addressed in the Final EA.

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AADT	Annual Average Daily Traffic
ACA	Ambulatory Care Addition
ACGMD	Alachua County Growth Management Division
ACHP	Advisory Council on Historic Preservation
ACM	Asbestos-Containing Materials
ADT	Average Daily Traffic
AHERA	Asbestos Hazard Emergency Response Act
ALTA	American Land Title Association
APE	Area of Potential Effect
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
BGSF	Building Gross Square Footage
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CGP	Construction Generic Permit For Stormwater Discharge From Large And Small Construction Activities
CLG	Certified Local Government
CO	Carbon Monoxide
CUP	Central Utility Plant
CZMA	Coastal Zone Management Act
DDC	Direct Digital Controls
EA	Environmental Assessment
ED	Emergency Department
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EJ	Environmental Justice
EO	Executive Order
ESA	Endangered Species Act
FDOT	Florida Department of Transportation
FIRM	Federal Emergency Management Agency Flood Insurance Rate Map
FL	Florida
FLCMP	Florida Coastal Zone Management Program
FLDEP	Florida Department Of Environmental Protection
FONSI	Finding Of No Significant Impact
FTA	Federal Transit Administration
GRU	Gainesville Regional Utilities
H/VAC	Heating/Ventilation and Air Conditioning
HSA	Hospital Services Addition
HUD	U. S. Department of Housing and Urban Development
ICRIP	Initial Cultural Resources Impact Prediction
IERA	Institute for Environment, Safety and Occupational Health Risk Analysis
LCP	Lead-Containing Paint
LED	Light-Emitting Diode

Acronym/Abbreviation	Definition
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
MARSSIM	Multi-Agency Radiation Survey And Site Investigation Manual
MEP	Mechanical, Electrical, and Plumbing
MRVAMC	Malcom Randall Veterans Administration Medical Center
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection And Repatriation Act
NEPA	National Environmental Policy Act
NESHAP	National Emission Standard For Hazardous Air Pollutants
NF/SGVHS	North Florida/South Georgia Veterans Health System
NHHP	National Health Physics Program
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NOX	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRC	U.S. Nuclear Regulatory Commission
NRCS	National Resource Conservation Service
NRHP	National Register Of Historic Places
NSF	Net Square Footage
NUREG	U.S. Nuclear Regulatory Commission
OCFM	Office of Construction and Facilities Management
OIT	Office of Information and Technology
OR	Operating Room
OSHA	U.S. Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyls
PE	Probability of Exceedance
PFD	Program For Design
PM	Particulate Matter
PRR	Project Risk Register
PSRDM	Physical Security and Resiliency Design Manual
RME	Reusable Medical Equipment
SCH	Florida State Clearinghouse
SEPS	Space and Equipment Planning System
SF	Square Feet
SHPO	State Historic Preservation Office
SICU	Surgical Intensive Care Unit
SIP	State Implementation Plans
SPS	Sterile Processing Services
SR	State Road
SW	Southwest
SWPPP	Stormwater Management Plan
TCLP	Toxicity Characteristic Leaching Procedure
TPY	Tons Per Year
TRB	U.S. Transportation Research Board
TTG	The Traffic Group

Acronym/Abbreviation	Definition
UF	University of Florida
UFC	Unified Facilities Criteria
US	United States
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish And Wildlife Service
USGBC	U.S. Green Building Council
USGS	U.S. Geological Survey
VA	U.S. Department Of Veterans Affairs
VAMC	Veterans Affairs Medical Center
VOC	Volatile Organic Compounds

1. INTRODUCTION

The U.S. Department of Veterans Affairs (VA) has VA prepared this Draft Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code §§ 4321-4370h), as implemented by the Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] §§ 1500-1508); Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26); and VA's NEPA Interim Guidance for Projects (VA, 2010).

NEPA requires federal agencies to consider the environmental effects of their proposed actions. The EA evaluates the potential impacts on the human environment resulting from the Proposed Action to correct non-compliant surgical, emergency, pharmacy, and sterile processing services at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), Alachua County, 1601 SW Archer Road, Gainesville, FL.

1.1 Purpose and Need

One of the critical missions of VA is to provide healthcare to the nation's millions of Veterans. This often requires construction projects to meet the changing demand for services, improve aging infrastructure, and keep pace with ever changing technology and models of care.

Under the Proposed Action, the existing Ambulatory Care Addition (ACA) would be demolished, along with several ground-level parking areas; the open area would be used to create a new, larger Hospital Services Addition (HSA); a new 500-space parking garage; a relocated loop road; and other supporting infrastructure.

The ***purpose*** of the Proposed Action is to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies. The HSA would supply the required amount of space, create an efficient configuration, and improve communications. The additional space (new and renovated) would correct significant issues in the existing key departments of Surgery, Pharmacy Services (inpatient and outpatient), Emergency Department (ED), Sterile Processing Services (SPS), Surgical Intensive Care Unit (SICU), Office of Information and Technology (OIT), Logistics, Health Administration Services, Prosthetics, Sensory Aid Services, Pathology, and Laboratory Medicine.

The concurrent addition of a new parking garage would increase capacity and reduce patient walking distances to critical services.

The Proposed Action is ***needed*** to bring the MRVAMC services into compliance with current facility codes and to provide the standard of care to Veterans in North Florida and South Georgia required to meet current and future VA strategic goals.

The EA analyzes a single site location covering approximately 10 acres on the western portion of the MRVAMC campus for implementation of the Proposed Action. The Proposed Action would include demolition of the existing ACA and several other buildings currently on the site to accommodate the HSA (approximate 250,000 building gross square feet [BGSF]), a new 500-space parking garage (five deck with 100-spaces per deck; approximately 60,000 square feet [SF] per deck), relocation of major utilities, and relocation of the existing loop road.

The EA also examines a No Action Alternative; a process required under NEPA that serves as the

baseline for impact analysis. Under the No Action Alternative, the Proposed Action would not be implemented and existing deficient conditions at the MRVAMC would remain unresolved for the foreseeable future. For this reason, the No Action Alternative does not meet the purpose and need for action and would diminish the level of care that VA is able to provide at the MRVAMC to Veterans in North Florida and South Georgia.

The EA provides VA decision makers the information needed to construct and operate service enhancements at the MRVAMC while minimizing potential adverse impacts to the human and natural environment. Once the Final EA is completed, a conceptual alternative would be selected and refined during a formal design process performed by VA in collaboration with the U.S. Army Corps of Engineers (USACE) and a designated Architect/Engineer of Record (A/E).

1.2 Background

The North Florida/South Georgia Veterans Health Care System (NF/SGVHS) serves Veterans across a large geographical area across 33 counties in North Florida and 19 counties in South Georgia. In addition to the MRVAMC in Gainesville and the Lake City VAMC, the NF/SGVHS includes over twenty community-based outpatient clinics. The NF/SGVHS is VA's largest Health Care System spanning 40,000 square miles across the two states.

In 1962, the VA Administrator approved the master plan which provided for a 480-bed general hospital to be located adjacent to the University of Florida. VA purchased 31 acres of land and construction began on January 16, 1964. Malcom Randall was the first director and, upon his retirement in 1998, the hospital was renamed in his honor. At the dedication on October 22, 1967, the keynote speaker, U.S. Representative Olin E. "Tiger" Teague, stated: "The Veterans of the sunshine state can be assured they are never forgotten men." The five-story hospital began admitting patients in October 1967.

The MRVAMC in Gainesville is the hub of the NF/SGVHS. It is a tertiary care facility that also serves as an active teaching hospital with an extensive array of specialty services. The MRVAMC combines a full range of patient care services with state-of-the-art technology, education, and research. Between 40,000 and 50,000 outpatient visits are provided each month. Patients from the system of clinics must travel to Gainesville for most specialty services resulting in over 100,000 Veterans served annually. In 2021, the MRVAMC served 119,722 Veterans and provided 670,233 outpatient visits (VA, 2021a). Combined with approximately 12,000 in-patient admissions each year, the MRVAMC is one of the busiest VA medical centers in the country.

Specialized services include but are not limited to: Traumatic Brain Injury Treatment, Spinal Cord Injury Treatment, Stroke Rehabilitation, Radiation/Oncology, Hospice and Palliative Care, and Surgery (including Surgical Inpatient Care, Cardiothoracic, Neurological, and Musculoskeletal).

The MRVAMC campus now encompasses approximately 41 acres in the center of the City of Gainesville, Florida (Figure 1 and Figure 2). It is bounded on the north by SW Archer Road (also known as State Road [SR] 24), on the east by SW 16th Street, on the south by SW 16th Avenue (also known as SR 226), and on the west by the intersection of SW Archer Road and SW 16th Avenue (Figure 3). The existing main medical center, now often referred to as Building 1, was made up of wings A, B, C, and D when it was built in 1966. In 1998, wings F and G were constructed and designated together as the Ambulatory Care Addition (ACA). See Figure 4 for the current MRVAMC orientation plan.

Figure 1. MRVAMC Regional Location Map

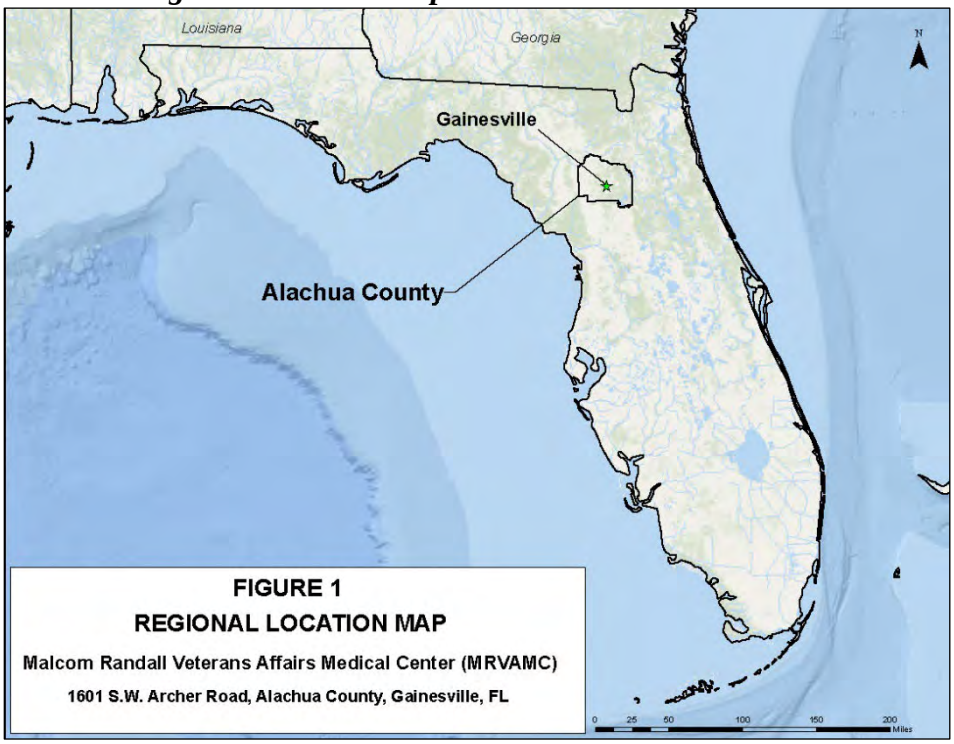


Figure 2. MRVAMC Site Locus Map

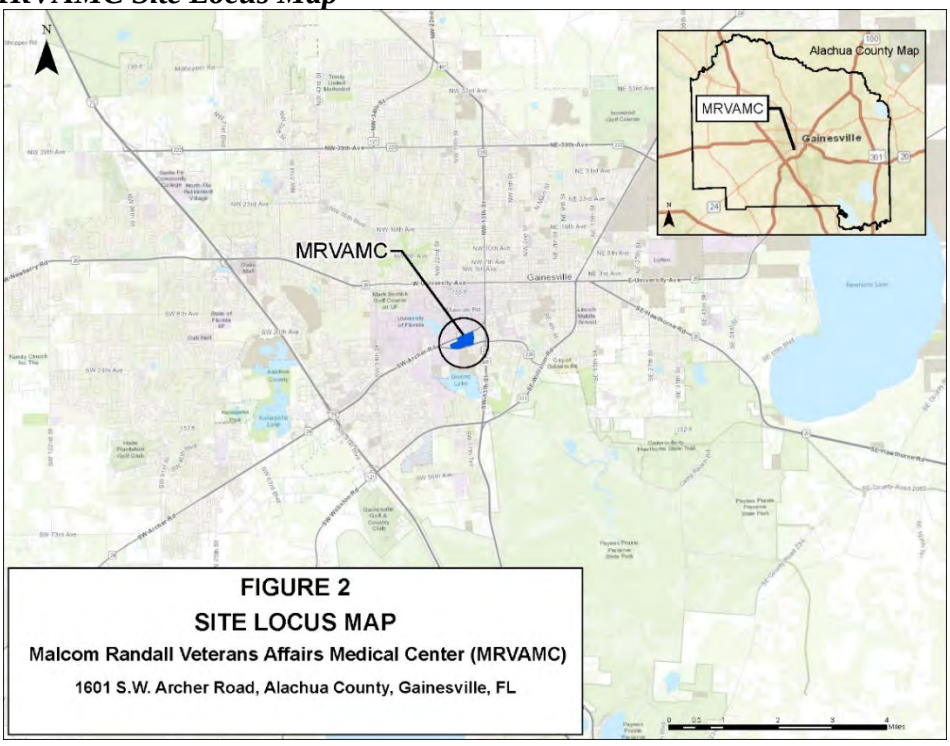


Figure 3. MRVAMC Site Map

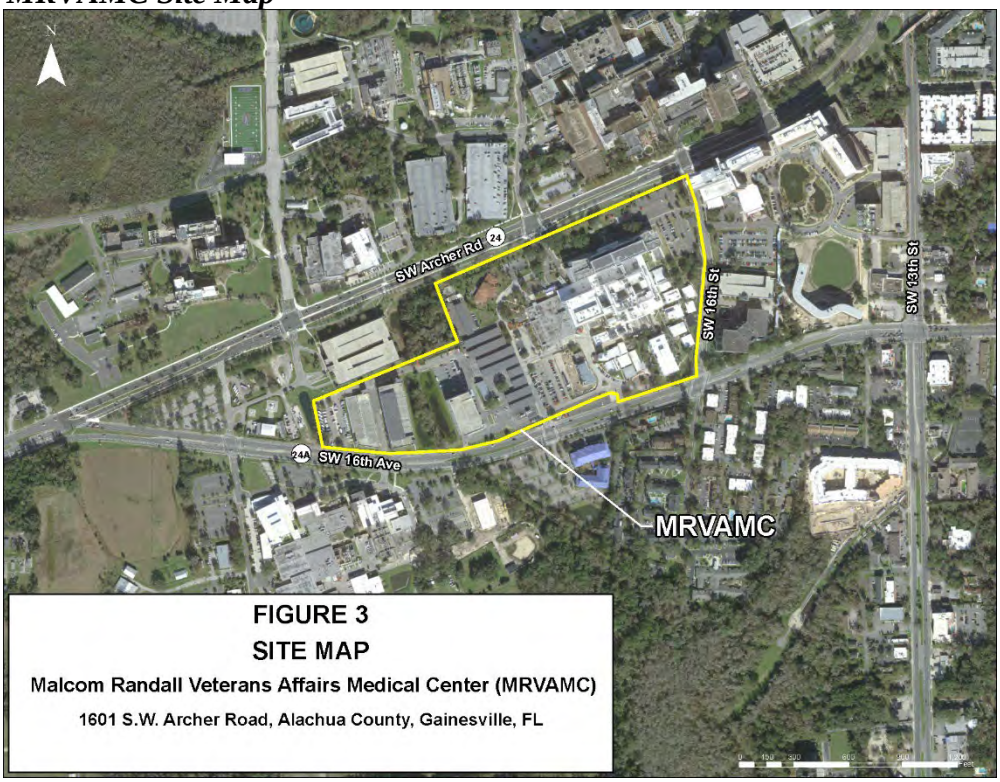
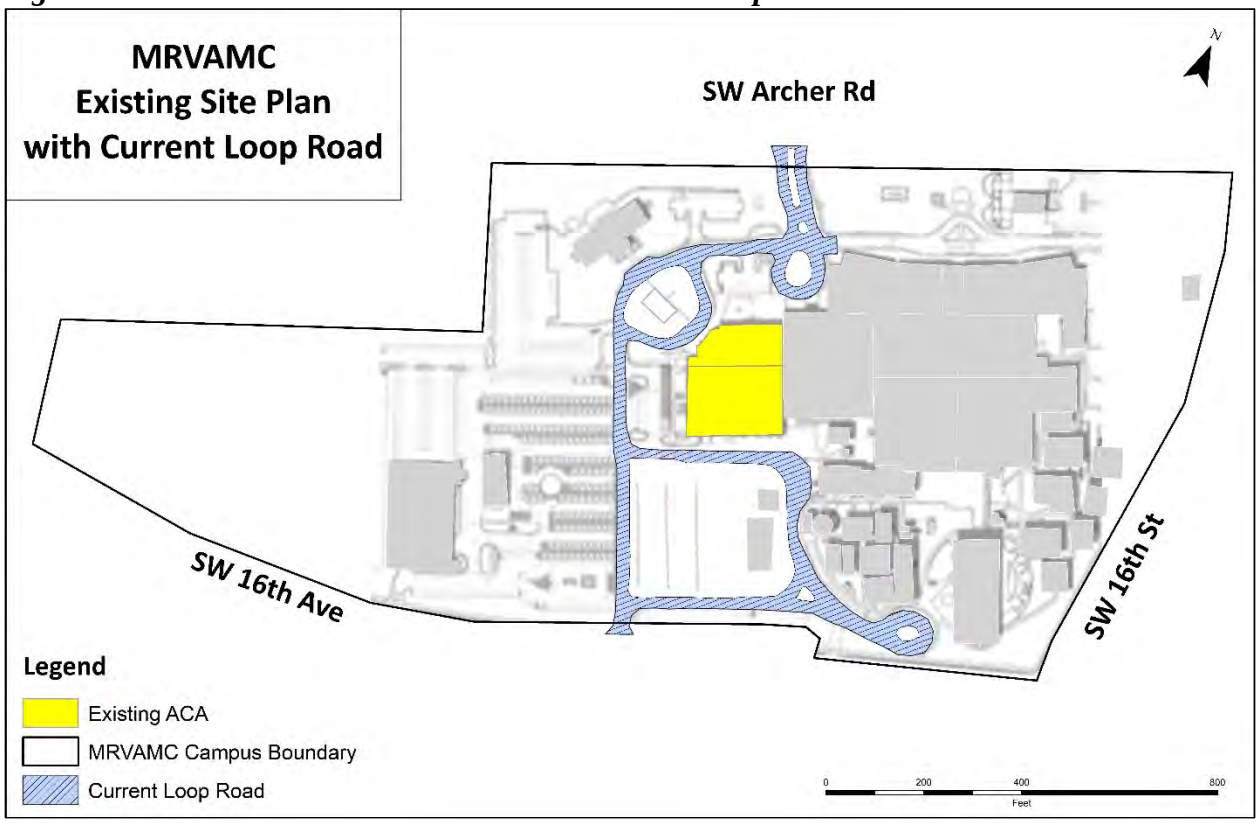


Figure 4. Current MRVAMC Site Plan with Current Loop Road



1.3 Proposed Action

A detailed description of the Proposed Action is presented in Section 2.1. In summary, the Proposed Action, titled Correct Non-Compliant Surgical, Emergency, Pharmacy and Sterile Processing, would demolish the existing ACA (approximately 107,692 BGSF). An HSA (approximately 250,000 BGSF) would be built to correct significant issues in the existing key departments of Surgery, Pharmacy Service, Emergency, Sterile Processing, Surgical Intensive Care Unit, and other services. The concurrent addition of a new parking garage would increase capacity and reduce patient walking distances to critical services as well as account for the loss of existing surface parking as a result of the HSA construction. A number of other buildings would also be demolished, and the existing loop road would be demolished and a new loop road would be constructed with improved safety and accessibility features. As the proposed services planned for the HSA would be considered Mission Critical, the new HSA would comply with the building design requirements in the Physical Security and Resiliency Design Manual (VA, 2022e).

1.4 Regulatory Basis for the Environmental Assessment

VA is required to evaluate the potential environmental impacts of VA facilities, operations, and related funding decisions in accordance with the NEPA Act of 1969 (42 United States Code 4321 *et seq*.), the White House Council on Environmental Quality (CEQ) "Regulations Implementing the Procedural Provisions of NEPA" (40 CFR 1500–1508), VA's NEPA regulations titled "Environmental Effects of the Department of Veterans Affairs Actions" (38 CFR Part 26), and VA's NEPA Interim Guidance for Projects (VA, 2010).

VA utilizes the NEPA review process to make an informed decision prior to implementing a Proposed Action. An EA provides sufficient analysis to determine whether an action would cause significant environmental impacts (requiring an Environmental Impact Statement [EIS]) (40 CFR 1508.9). VA decision makers review the EA and, if an EIS is not required, can issue a Finding of No Significant Impact (FONSI) (40 CFR 1508.13). As required by NEPA and the implementing regulations from CEQ and VA, the EA also evaluates a No Action Alternative, which provides a baseline for comparison of potential impacts associated with the Proposed Action.

1.5 Decision-Making

VA has prepared this EA to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with implementing the Proposed Action. The EA also examines a No Action Alternative.

VA, as a federal agency, is required to incorporate environmental considerations into its decision-making process for the actions it proposes to undertake. This is done according to the regulations and guidance identified above.

The EA informs the public of the possible environmental impacts of the Proposed Action and methods to reduce impacts; supports informed decision-making by the federal government; 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.

2. PROPOSED ACTION AND NO ACTION ALTERNATIVE

NEPA regulations require that federal agencies evaluate reasonable alternatives for meeting the purpose of and need for action, as well as a No Action Alternative.

2.1 Proposed Action

The existing ACA surgical services facilities are undersized per VA standards. All of the existing operating rooms are functionally deficient due to being undersized and do not meet national design guide standards. The existing size, location, and design of the facility create the following issues:

- Surgical suite design is functionally deficient as it does not meet current design guide "racetrack" configuration around a centrally located clean core (clean core configuration is currently non-existent).
- Undersized operating rooms create workflow and surgical staff space functional deficiencies due to constraints in placement of support equipment, ancillary support area needs, and sterile fields. Current operating rooms average at approximately 480 net square footage (NSF) compared to current design standards of 650 to 900 NSF.
- Surgical services has direct adjacency and connectivity functional deficiencies to sterile processing (deficient clean core standards) and surgery lacks both a direct horizontal and vertical adjacency to sterile processing services for required surgical equipment transfer efficiencies.
- Ceiling heights in the operating room spaces are functionally deficient and do not allow for needed modern surgical equipment and technology.
- Surgical services has functional deficiencies due to the space not having a dedicated soiled or clean elevator/corridor to sterile processing for delivery of clean Reusable Medical Equipment (RME) or retrieval of contaminated RME.
- Surgical services layout and space is functionally deficient with constraints in clean supply storage, equipment storage, operating rooms, lockers, staff lounges, pre-op and post-op recovery areas, patient rooms, as well as staff and support work areas as detailed in design guides.
- Recurring utility disruptions to power and medical gases as well as expansion joint issues create potential condensation/infection control issues in key sterile areas.

The Proposed Action involves demolishing the existing ACA and constructing and operating a new, larger Hospital Services Addition (HSA). The HSA would comply with current VA facility codes and standard of care practices and meet current and future VA strategic goals. The expansion would supply the required amount of space, create an efficient configuration, and improve patient care.

In developing the Proposed Action, VA used the Space and Equipment Planning System (SEPS), tool, during conceptional and pre-design efforts for space and equipment planning purposes. The SEPS generates a Program for Design (PFD), a project specific itemized listing of the spaces, rooms, and square foot area required for the proper operation of a specific service/department and the corresponding area for each. The HSA would meet the following "guiding principles" developed during strategic planning by MRVAMC medical staff and documented in this project's PFD:

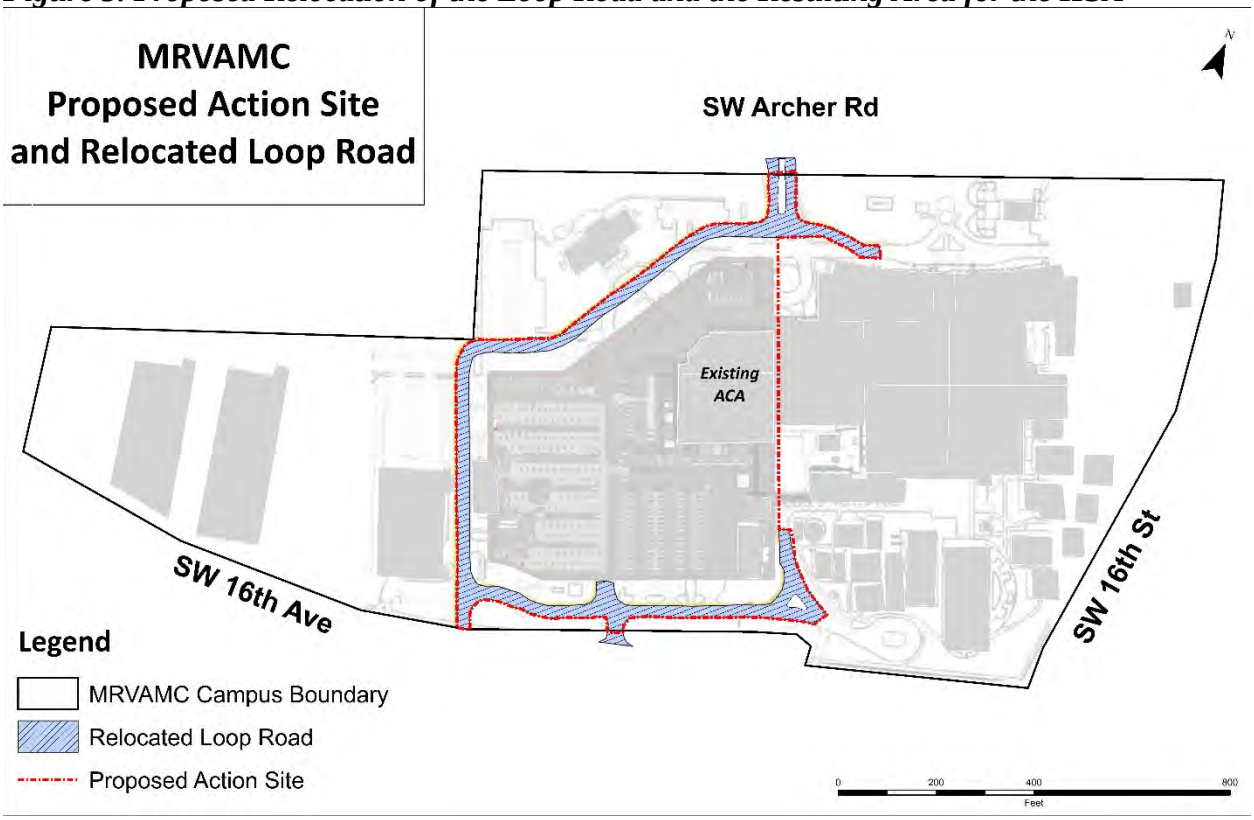
- Inpatient Pharmacy and Outpatient Pharmacy would be consolidated in one area to reduce redundancies and improve communications.
- The Pharmacy would be located adjacent to the Parking Garage for easy access to pick up prescriptions.
- The new Parking Garage would be located to reduce patient walking distances to critical services.
- The ED would have grade level access on Level 1 while Pharmacy has grade level access on the Basement level.
- The Endovascular Operating Rooms (ORs) and support spaces would be integrated with the major Surgical OR Suite and support areas.
- Dedicated clean and soiled elevators would be planned for vertical connection to Surgery from SPS.
- The lab expansion/renovation would be adjacent to current Pathology spaces.
- The Warehouse would have a maintained service yard with adequate tractor trailer maneuvering space.
- Vertical expansion would be incorporated into the design of the HSA as well as horizontal expansion.
- *Physical Security and Resiliency Design Manual* (PSRDM) guidelines would be met to maintain the required setbacks for Mission Critical Services within the PSRDM requirements (VA, 2022e).

2.2 Elements of the Proposed Action

VA has identified a general location for the HSA on the existing MRVAMC campus. This would be an approximately 10-acre area west of the existing ACA and bounded by the relocated loop road (Figure 5).

Due to the larger footprint of the HSA compared to the existing ACA, the Proposed Action would require demolition of other buildings and infrastructure to provide the space needed for the HSA within the 10-acre area. Certain departments and functions currently located in this area would need to be temporarily relocated prior to demolition. New buildings and infrastructure would need to be constructed to support services provided at the HSA. Section 2.2 provides a summary of the buildings to be demolished and buildings to be constructed to accommodate the reconfiguration of services.

Figure 5. Proposed Relocation of the Loop Road and the Resulting Area for the HSA

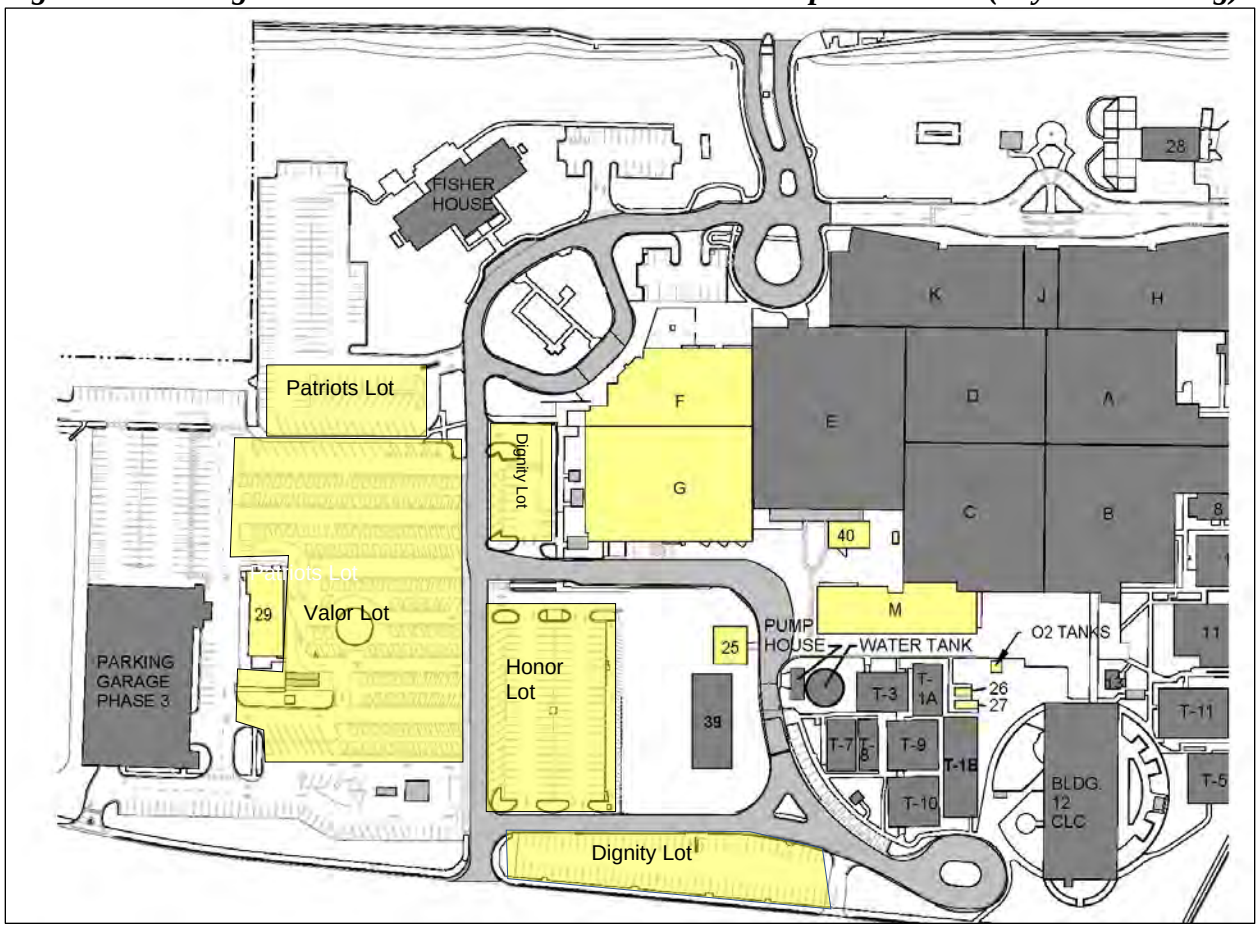


2.2.1 Demolition

In order to make room for the HSA, demolition of the following existing buildings and infrastructure would be necessary (as depicted on Figure 6):

- ACA
- Building 29 (standby emergency generator)
- Building 25 (main campus electrical switchgear)
- Building 40 (includes switchgear serving the C, D and E Wings plus another emergency generator)
- Central Utility Plant (CUP) in the M Wing including the four below-grade fuel tanks and lines located near the main hospital and generator buildings
- Outbuilding structures 26 (radiation waste) and 27 (hazardous waste storage)
- Most or all of the following surface parking lots: Patriots, Valor, Dignity, Honor, and Heritage, including removal of the solar canopies.

Figure 6. Buildings and Lots to be Demolished under the Proposed Action (in yellow shading)



2.2.2 New Construction

The following new buildings and supporting infrastructure would be constructed:

- New HSA with a potential connecting corridor to the main hospital building.
- New 500-space parking garage (5 decks) to replace displaced surface parking. The new garage would be located to the west of the HSA and include a bridge connecting the garage to the HSA basement and first level. The location of the proposed garage is designed to make walking distances more manageable for Veterans navigating their way to their appointments.
- A new utility addition is proposed for the south side of the E Wing to house the services previously in Building 29 (standby emergency generator), Building 25 (main campus electrical switchgear), Building 40 (includes switchgear serving the C, D and E Wings plus another emergency generator), the CUP in the M Wing, and new fuel tanks to meet the anticipated demand.
- A new Central Chiller Plant in order to meet the expected load demand of the existing MRVAMC and the HSA.
- Relocation of the loop road to provide more ground area for redevelopment.
- Relocation of major utilities currently within the planned footprint of the HSA and adjacent to the area planned for the relocated loop road.

2.2.3 Functional Service Relocation

Prior to demolition of the current ACA, the functional services performed there would need to be temporarily relocated to swing space (an interim working environment used during renovation/construction). These services would then be moved into the HSA once it becomes operational and include Prosthetics, Medical Service Administration, Research, and the Centralized Staff Lockers and Toilets; all of which are currently located on the basement level of the ACA. Travel, Release of Information, Patient Processing, Admitting, and Admissions, currently on the first level, would also need swing space. Other functions that would need swing space include Exam Rooms, Social Work, and Nutrition.

The existing Warehouse in the basement level of the ACA would be temporarily relocated to vacant space in the main hospital or in temporary trailers. The Outpatient Pharmacy would be relocated to vacant space in the main hospital and be conveniently located for patients while the HSA is under construction.

The western entrance/exit of the existing ACA used by visitors and staff and where valet parking is obtained would be temporarily relocated to the Patient Tower entrance.

Prior to demolition, the mechanical equipment in the penthouse of the existing ACA would be relocated and commissioned for operation. This mechanical equipment also serves the E Wing and specifically the existing surgery area. The relocated equipment needs to be in operation prior to the demolition of the ACA to keep the existing surgery operational.

2.2.4 Parking

The Proposed Action includes a new 500-car parking garage to support the HSA and account for the loss of surface parking due to the Proposed Action.

However, this new garage may not be operational before most or all of the selected surface parking lots are demolished (Patriots, Valor, Dignity, Honor, and Heritage).

To offset this loss of surface parking during construction, the MRVAMC would provide a combination of alternate on-site parking and temporary off-site parking. On-site parking would be available through the Liberty and Independence Garage Expansion Projects, both of which are being completed independent of the Proposed Action. Temporary off-site parking would be available at the Winn-Dixie at 300 SW 16th Avenue (0.75 miles away) and the Days Inn located at 1901 SW 13th Street (0.3 miles away), with shuttle service provided by VA.

2.2.5 Staffing

Swing space and temporary relocation of departments would provide for all staff to continue to work in their current roles. The HSA would accommodate all current staff. The current medical and support staffing levels are anticipated to be maintained. Should additional staff be required, VA would follow standard hiring practices and procedures.

2.2.6 Sustainable Design

2.2.6.1 Energy

VA requires major renovations be designed to reduce energy used by a minimum of 30% compared to the baseline building performance rate per American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) *90.1-2019 Energy Efficiency Standard for Buildings*. The design for the Proposed Action would meet this requirement.

Per *VA Sustainable Design Manual Section 2.4.1*, dated August 18, 2017, all VA construction and renovation projects occurring on buildings of 5,000 SF or more shall comply with the *2016 Guiding Principles for Sustainable Federal Buildings* (VA, 2017). Further, the VA Office of Construction and Facilities Management (OCFM) *Policy Memorandum 003C-2021-21, Green Building Certification Requirements*, dated August 3, 2021 (VA, 2021b), and the *Standards Alert 018*, dated August 24, 2021 (VA, 2021c), established green building certification requirements to support VA facility compliance with applicable laws. The policy requires that VA must certify all VA major construction projects, including major renovations, using U.S. Green Building Council (USGBC) "Leadership in Energy and Environmental Design" (LEED) certification system and achieve a minimum certification level of silver (USGBC, 2022).

Accordingly, the Proposed Action would incorporate sustainable design elements to include installing LED lighting; maximizing energy performance; installing advanced utility meters for electricity, natural gas, and/or steam; and employing total building commissioning practices (VA, 2021b). The A/E would also be required to design the HSA to achieve a minimum of a LEED silver certification by an independent third party.

Additionally, *VA Sustainable Design Manual* (VA, 2017) Section 5.1 requires that all VA construction and renovation projects employ strategies that in aggregate use a minimum of 20 percent less potable water than the indoor water use baseline calculated for the building, after meeting the Energy Policy Act of 1992, and the International Plumbing Code 2006 fixture performance requirements.

VA's sustainable design commitments are consistent with U.S. Environmental Protection Agency (USEPA) Region 4's response to VA's request for early input on the Proposed Action, where USEPA recommended that VA consider green building practices that provide an opportunity to create environmentally-sound and resource-efficient buildings by using an integrated approach to design. A copy of USEPA's response is provided in Appendix A.

2.2.6.2 Stormwater Management

The Proposed Action is a federal action having a construction footprint greater than 5,000 SF. Therefore, the A/E would design the Proposed Action to comply with Section 438 of the Energy Independence and Security Act (EISA) of 2007 by using site planning, design, construction, and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow. The A/E would produce documents showing how site planning, design, construction, and maintenance strategies would meet this requirement.

Accordingly, the Proposed Action would include opportunities for use of alternative water sources, including water recycling, industrial water reuse, water reclamation, and stormwater harvesting and provide appropriate infrastructure to support selected opportunities.

Additionally, because the Proposed Action would disturb greater than one acre of contiguous land during construction, the A/E would apply for, obtain, and implement the terms of the Florida Department of Environmental Protection (FLDEP) National Pollutant Discharge Elimination System (NPDES) Generic Permit for Stormwater Discharge from Large and Small Construction Activities (CGP), including best management practices (BMPs) specified in the Stormwater Management Plan (SWPPP) to minimize stormwater volume and velocity, soil erosion, and sedimentation of stormwater runoff from the Proposed Action site. Based on the final design of

the Proposed Action, the A/E would also obtain any operational stormwater management permits required by FLDEP and the City of Gainesville and ensure any modifications to the MRVAMC stormwater system comply with the City of Gainesville *Engineering Design & Construction Manual Chapter 4: Stormwater Management*. This approach is consistent with USEPA Region 4's recommendation in response to VA's request for early input on the Proposed Action regarding stormwater management (Appendix A).

2.2.7 No Action Alternative

The No Action Alternative serves as the baseline for which the effects of the Proposed Action can be evaluated, as required by NEPA regulations (38 CFR Part 26). Under the No Action Alternative, the Proposed Action would not be implemented and existing deficient conditions at the MRVAMC would remain unresolved for the foreseeable future. For this reason, the No Action Alternative does not meet the purpose and need for action and would diminish the level of care that VA is able to provide at the MRVAMC to Veterans in North Florida and South Georgia.

2.3 Alternatives Considered but Dismissed from Further 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 Renovation and Expansion of the Existing ACA

VA initially considered vertically expand the existing ACA. Based on analyses, the renovation and expansion of the existing ACA became unfeasible in terms of supplying the required amount of space as well as an efficient configuration to serve all proposed services.

Several disadvantages to expanding and renovating the ACA became apparent:

- An awkward, limited area for vertical expansion above the ACA would not result in any efficient layouts.
- The existing structural grid would not accommodate the large clear areas needed for ORs and surgical support areas.
- To create larger structural grid bays, ceiling heights would be further reduced.
- Proposed Mission Critical Services would trigger structural upgrades for blast resistance and progressive collapse if renovated.

The assessment resulted in a recommendation to demolish the ACA and construct an HSA to house the planned services except for Pathology. Expanded Pathology services would occur in renovated space within the main hospital building. For these reasons the alternative of renovation and expansion of the ACA was dismissed from further analysis in this EA as it would not meet the purpose and need of the Proposed Action.

2.3.2 East Campus Expansion

VA considered relocating the Warehouse to the area east of the main hospital building and south of the Tribute and Pride parking lots. Locating the Warehouse on the east side of the site would require the demolition of Buildings 14 and 8, including the therapy pool. The team also studied

the possibility of locating the ED on the east side. This would make the service remote from Surgery and Imaging with long connecting walking distances. The steep grade was another consideration in the evaluation of the east side site option. The grade drops one floor level in that area. A two-story addition to that site could be an option. However, the Warehouse and the ED were eliminated as feasible options for such an approach due to the need for the vehicular access to those functions while also mitigating the steep slope. The Warehouse would need a large service yard for large semi-trucks to maneuver. The ED needs an ambulance entrance and a walk-in entrance with convenient parking nearby. The site area on the east campus does not have the space available to accommodate the vehicular traffic and the footprint of the programs. For these reasons the alternative of an expansion on the east side of the MRVAMC was dismissed from further analysis in this EA as it would not meet the purpose and need of the Proposed Action.

2.3.3 Offsite Expansion

VA's *Surgical and Endovascular Services Design Guide* (May 2022 revision) states, "Recently there has been a shift toward one integrated interventional platform consolidating surgical and invasive cardiovascular services directly adjacent to each other. By utilizing the same aseptic environment this concept maximizes efficiency by sharing resources and promotes quality outcomes and patient safety." The VA *Surgical and Endovascular Services Design Guide* does not describe locating these services away from the main campus in an off-site facility.

An off-site suit to lease facility would not allow VA to consolidate critical medical services at the MRVAMC, would not provide a direct connection to the main hospital building, thus not improving Veterans' access to VA-provided medical services.

For these reasons the alternative of an off-site alternative was dismissed from further analysis in this EA as it would not meet the purpose and need of the Proposed Action.

3. AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section describes the affected environment and evaluates the potential environmental effects of the Proposed Action and the No Action Alternative. The affected environment includes the MRVAMC campus, and depending on the resource, a region surrounding the campus. CEQ regulations (40 CFR 1501.3) specify that in considering whether the effects of a proposed action are significant, agencies shall analyze the potentially affected environment and degree of the effects of the action. In considering the potentially affected environment, agencies should consider, as appropriate to the specific action, the affected area (national, regional, or local), and its resources.

3.1 Criteria for Analysis of Impacts

The specific criteria for evaluating the potential environmental impacts of the Proposed Action and the No Action Alternative are described in the following sections. The significance of an action is also measured in terms of its context and intensity. The context and intensity of potential environmental impacts are described in terms of duration, the magnitude of the impact, and whether they are adverse or beneficial, as summarized in the following paragraphs:

Short-term or long-term. In general, short-term impacts are those that would occur only with respect to a particular activity, for a finite period, or only during the time required for construction or installation activities. Long-term impacts are those that are more likely to be persistent and chronic. Impacts must also be reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives.

Less-than-significant (negligible, minor, moderate), or significant. These relative terms are used to characterize the magnitude or intensity of an impact. Negligible impacts are generally those that might be perceptible but are at the lower level of detection. A minor impact is slight, but detectable. A moderate impact is readily apparent. Significant impacts are those that, in their context and due to their magnitude (severity), have the potential to meet the thresholds for significance set forth in CEQ regulations (40 CFR Part 1508.27) and, thus, warrant heightened attention and examination for potential means for mitigation to fulfill NEPA. Significance criteria by resource area are presented in the following sections.

Adverse or beneficial. An adverse impact is one having unfavorable or undesirable outcomes on the human-made or natural environment. A beneficial impact is one having positive outcomes on the human-made or natural environment.

3.2 Environmental Resources Dismissed from Further Analysis

The potential impacts of the Proposed Action and the No Action Alternative on certain environmental resources were analyzed but were determined to be none to negligible at even a localized level. Therefore, the Proposed Action would not impact nor necessitate compliance with any requisite regulatory requirements associated with protecting these resources. A brief summary of the environmental resources dismissed from further detailed analysis is provided in Table 1.

Table 1. Environmental Resources Dismissed from Further Analysis

Environmental Resource Dismissed	Rationale
Land Use and Zoning	The Proposed Action is consistent with activities at the MRVAMC and with the City of Gainesville Land Use and Zoning regulations. The Proposed Action would not require changes in land use or zoning to properties adjacent to or in the vicinity of the MRVAMC. The MRVAMC has been operating in this location for over 50 years in concert with increasing residential and commercial development in abutting properties and throughout Gainesville. Thus, the Proposed Action would not reasonably be anticipated to induce any future changes in land use or zoning at properties outside of the MRVAMC. Therefore, the Proposed Action would have no impact on these resources.
Wildlife and Habitat	There are no federal- or state-listed flora or fauna at the Proposed Action site. The Proposed Action site is highly developed with buildings, extensive pavements, and grounds that are subject to routine mowing and maintenance. Thus, the site does not provide suitable habitat to support listed wildlife species or birds protected under the Migratory Bird Treaty Act. Therefore, the Proposed Action would have no impact on wildlife or habitat. The findings from the U.S. Fish and Wildlife (USFWS) Information for Planning and Consultation (IPaC) database search results are provided in Appendix B.
Wetlands	According to the USFWS National Wetlands Inventory Map Viewer, there are no wetlands or natural surface water bodies on the campus. A copy of the map is provided in Appendix B. The 2021 U.S. Geological Survey (USGS) topographic map depicts the closest wetlands as off-site (south of MRVAMC and on the southern side of Route 226).
Floodplains	The MRVAMC is located on the Federal Emergency Management Agency Flood Insurance Rate Map (FIRM) FIRMette panels 12001C0313E and 12001C0314D. The MRVAMC is in an area of minimal flood hazard, meaning outside of the 0.2%- and 1%-annual chance (500-year and 100-year, respectively) flood zones. A copy of the FIRMette panels is provided in Appendix B.

3.3 Aesthetics

Aesthetics refers to the visual resources, including natural and human-made features that give a particular piece of land its aesthetic properties. A combination of natural and built features influence and contribute to the aesthetic environment of an area. Natural features may include topography and vegetation, which may have been altered over time by human action, while built features can include buildings and other constructed elements. Beneficial or adverse impacts may occur depending on how changes to the existing aesthetic environment are perceived by human receptors, which can include visitors and staff at the MRVAMC and residents living adjacent to and in the vicinity of the MRVAMC.

3.3.1 Existing Conditions

The Proposed Action site (Figure 3) is located in the central portion of the MRVAMC campus. This area of the MRVAMC is dominated by the built environment, which includes buildings, a

parking area with a solar canopy, roadways, walkways, curbing, landscaped grounds and plantings, light fixtures, and supporting infrastructure.

A detailed analysis of the cultural and historic resources is presented in Section 3.5. In summary, while the original MRVAMC is more than 50 years old and thus meets the definition to be classified as a historic structure, it is a standard late 20th century commercial form with extensive alterations and additions which have significantly changed its original design, construction, and materials. Therefore, it does not meet the criteria to be listed on or eligible for the NRHP. The Proposed Action site buildings are all newer and the ACA is a more recent building massing addition.

3.3.2 Environmental Consequences

3.3.2.1 Construction

The aesthetic impacts during construction are associated with how staff and visitors who are familiar with the existing campus aesthetics would perceive the temporary modifications created during the Proposed Action construction phase.

The Proposed Action site is on the western portion of the MRVAMC campus and would be visible to staff and patients walking between the western parking garages and the main building. However, the Proposed Action site is not visible from patient rooms, there is limited visibility of the site from outside of the campus, and the campus and the surrounding area are intensely developed.

To further limit the view of the construction site, the construction contractor would install temporary fencing with privacy screens around the construction areas. The fencing would also establish a safe construction zone work area and minimize visibility of the demolition of selected buildings and infrastructure and the construction of the HSA, loop road, parking garage, and new utility infrastructure. The construction contractor would also designate an area within the fenced boundary where construction equipment and materials would also be staged.

To prevent the release of fugitive dust into the air, the construction contractor would also implement dust suppression methods identified in *VA Specification 01 57 19: Temporary Environmental Controls*. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of dust-generating activities during sustained high wind conditions (10-40 mph with gusts at or above 50 mph). Additionally, the contractor would install and maintain gravel pads at the construction site exit to prevent tracking loose soil onto roadways.

Based on the final design for the Proposed Action, the construction contractor would also plant native, non-invasive, drought-resistant vegetation where required. This vegetation would enhance the final appearance of the completed construction site and help to stabilize soils and minimize dust generation.

Therefore, construction of the Proposed Action is anticipated to have a direct, short-term, less-than-significant adverse impact on aesthetics at the MRVAMC. This impact would end once the construction phase is complete.

3.3.2.2 Operation

The design for the HSA and parking garage would be consistent with the existing aesthetic of modern medical facility, and during its operation the façade would be professionally maintained under the direction of the MRVAMC staff. Additionally, new landscaping installed during

construction would be professionally maintained by MRVAMC staff to provide a greenscape around the HSA.

Therefore, the Proposed Action would have a long-term, direct, minor beneficial impact on aesthetics within the western portion of the MRVAMC. There would be no impacts to aesthetics elsewhere at the MRVAMC.

3.3.2.3 No Action

Under the No Action Alternative, no changes to the existing aesthetics of the MRVAMC aesthetic viewshed would occur. Regular maintenance activities would continue. Therefore, the No Action Alternative would have no mechanism to impact aesthetics.

3.4 Air Quality

Air quality refers to the concentration of air contaminants in a specific location. Air quality is determined by the type and number of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions.

3.4.1 Existing Conditions

3.4.1.1 Regional Climate

Weather and climate are important influences on air resources. Gainesville has an average summertime high temperature above 85°F. July has the hottest average high temperature at 90°F. Often temperatures are above 90°F and occasionally break 95°F. A record high temperature was recorded at 105°F in June of 2020. The coldest average temperature is in January with an average high temperature of 71°F. Average annual precipitation (rainfall) is 50.2 inches. Rainfall is most likely between June and September, with the highest monthly average rainfall occurring in July with 6.0 inches (NOAA, 2023).

Extreme weather events include high heat with very high humidity and high wind gusts with the possibility of tornadoes. Tornadoes frequent the area; however, they are typically rated by the National Weather Service as “EF2” (3-second wind gusts of 111-135 miles per hour) or less. Tropical storms and hurricanes also occur due to Gainesville’s proximity to the Gulf of Mexico. The last hurricane to make landfall in Gainesville was Hurricane Elsa in 2021 (NOAA, 2022).

3.4.1.2 National 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), as amended, requires the U.S. Environmental Protection Agency (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” (per Section 108 of the CAA):

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO_x)
- Ozone (O_3) (using volatile organic compounds [VOC] as a precursor)
- Particulate matter (PM), divided into two size classes:
    - Aerodynamic size less than or equal to 10 micrometers (PM_{10})
    - Aerodynamic size less than or equal to 2.5 micrometers ($PM_{2.5}$)
- Sulfur dioxide (SO_2)

Geographic areas are designated by 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" if the state completes an air quality planning process for the area. Areas for which no monitoring data are available are designated as “unclassified” and are by default considered to be in attainment of the NAAQS.

According to USEPA, Alachua County, Florida has been designated in attainment for all criteria pollutants since 1992 (USEPA, 2022a).

3.4.1.3 Local Emissions Sources

Emissions sources at the MRVAMC that can impact air quality include the Central Heating Plant boilers, which primarily burn natural gas to generate steam for hot water and heat that is then distributed to the majority of buildings throughout the campus. Large chillers also burn natural gas to produce cooled water that is used to cool indoor air. Additionally, MRVAMC operates several diesel-fueled emergency generators to provide back-up power to critical medical functions in the event of a main power outage. According to FLDEP Division of Air Resource Management, the MRVAMC does not have any active air permits but formerly had a non-Title V Air Operation Permit for the CUP boilers (the permit expired in 2017) (FLDEP, 2023).

Other sources of emissions that can impact air quality at MRVAMC include regulated building materials, including asbestos-containing materials (ACM) and lead-containing paint (LCP), which are present at the MRVAMC. These materials, if disturbed and made small enough, can be released into the air and cause health impacts. See Section 3.10 for further analysis of hazardous materials management.

3.4.1.4 Sensitive Receptors

CEQ NEPA regulations require evaluation of the degree to which the Proposed Action affects public health (40 CFR 1508.27). Children, the elderly, and people with illnesses are especially sensitive to the effects of air pollutants; therefore, hospitals, schools, convalescent facilities, and residential areas are considered to be sensitive receptors for air quality impacts, particularly when located within one mile of the emissions source.

Sensitive air quality receptors in the immediate vicinity of the Proposed Action include patients in the MRVAMC main building. The MRVAMC campus is surrounded primarily by University of Florida (UF) buildings and parking lots. Somerset Village, a condominium complex, is the nearest residence at 0.11 miles south of the loop road across SW 16th Avenue. The other nearest off-campus sensitive receptors are: UF Health Shands Children’s Hospital, approximately 0.4 miles northeast of the MRVAMC; the Ronald McDonald House, approximately 0.7 miles southeast; UF Health Pediatrics – Gerold L. Schiebler CMS Center, approximately 0.3 miles south; UF Health Pediatric Specialties and UF Health Internal Medicine Medical Plaza, approximately 0.3 miles north; UF Health Heart & Vascular Hospital, approximately 0.3 miles east; and the UF Health Pediatric Emergency Room, approximately 0.3 miles northeast.

3.4.2 Environmental Consequences

The impacts of the Proposed Action on air quality were analyzed on a local region of influence. This is the area within approximately 1,500 feet of the Proposed Action site because sensitive receptors in this area may experience localized air quality impacts from construction and operational activities occurring at the Proposed Action site.

Direct emissions are emissions that are caused or initiated by a federal action and occur at the same time and place as the action. Indirect emissions are reasonably foreseeable emissions that are caused by the action but might occur later in time and/or be farther removed in distance from the action itself and that the federal agency can practicably control. There are no indirect emissions anticipated with this Proposed Action.

To evaluate emissions associated with the Proposed Action, this EA includes a General Conformity Applicability Analysis, which estimates levels of potential NOx, VOC, SO_2, CO, PM_{10}, and $PM_{2.5}$ air emissions from the Proposed Action construction activities.

3.4.2.1 Construction

3.4.2.1.1 Fugitive Dust Air Emissions

Construction activities often generate fugitive dust when vegetative cover or pavement is removed and the underlying soils are exposed and subjected to mechanical or natural disturbance. The amount of fugitive dust, also referred to as total suspended particles, can be estimated from the area of ground surface exposed, the type and intensity of activity, soil type and conditions, wind speed, and dust control measures used. The Proposed Action would temporarily expose soil where construction occurs within the approximately 10-acre Proposed Action site, which is generally defined by the boundary of the proposed new loop road.

Total suspended particulates that may be generated during the Proposed Action were calculated using the emissions factor for heavy construction activity operations from "AP-42, Compilation for Air Pollutant Emission Factors" (USEPA, 1995). Detailed emissions inputs and calculations are presented in Appendix B.

To minimize the generation of total suspended solids, the construction contractor would implement BMPs including dust suppression methods identified in *VA Specification 01 57 19: Temporary Environmental Controls*. Available methods include application of water mist or other dust palliatives to the structure being demolished and to exposed soils; use of enclosures and covers over highly friable materials being demolished; covering haul trucks with tarps; and postponing dust-generating activities during sustained high wind conditions (10-40 mph with gusts at or above 50 mph). Haul trucks would be covered with a tarp when transporting material to or from the site.

Construction vehicles and equipment with diesel-fueled engines also emit particulate matter. To limit these emissions, the construction contractor would limit engine idling to no more than three minutes to the extent practicable. Construction vehicles would also utilize Tier 4-compliant engines, to the extent practicable, to reduce emissions of particulate matter and nitrogen oxides to help meet emission standards established by USEPA.

Fugitive dust and particulate air emissions containing ACM and LCP can also be generated during demolition of the buildings where ACM and LCP were identified. To minimize the potential for the release of ACM or LCP, these materials would be abated (removed) from all buildings prior to demolition and then transported off-site for proper disposal, as described in Section 3.10.

3.4.2.1.2 Off-Road Construction Equipment Emissions

Emissions were estimated using the USEPA MOVES3.0 software (USEPA, 2020). Emissions factors for years 2028 through 2032 were used in these calculations; this time period represents VA's preliminary conceptual construction schedule. Should construction activities occur farther into the future, the emissions would generally be lower than those presented here because emissions factors typically decrease over time as new and more efficient equipment is brought to market.

Because the actual construction techniques can vary depending on the final architectural design for the Proposed Action, a composite of different construction equipment (e.g. excavators, graders, loaders, lifts) was used to estimate off-road heavy equipment construction emissions. However, separate emissions estimates were calculated for each major construction activity: parking garage construction; site grading; demolition of the ACA and supporting buildings; and construction of the loop road and HSA. Detailed calculations and assumptions for the off-road heavy equipment construction emissions are provided in Appendix B.

3.4.2.1.3 On-Road Heavy-Duty Construction/Haul Trucks

Construction of the Proposed Action would utilize on-road diesel-fueled heavy-duty vehicles, such as semi-trucks with multi-axle trailers used to transport demolition debris off-site and to bring building supplies and equipment on-site. Table 2 presents an annualized average of emissions generated by on-road diesel-fueled heavy-duty vehicles used to support each major construction activity under the Proposed Action. Detailed emissions inputs and calculations are presented in Appendix B.

3.4.2.1.4 Construction Workers' Vehicle Emissions

Emissions were estimated from gasoline-fueled passenger vehicles that construction workers would use to travel to and from the MRVAMC during the construction Phase. Because different construction activities would require different numbers of workers, separate emissions estimates for construction workers' vehicles were calculated for each major construction activity. Detailed emissions inputs and calculations are presented in Appendix B.

3.4.2.1.5 Total Construction Emissions

The total estimated construction emissions on an annualized average basis are presented in Table 2. Based on these estimates, none of the criteria pollutant concentrations would exceed the General Conformity de minimis threshold limits, either on an annualized basis or cumulatively. Therefore, construction of the Proposed Action would be considered to have a direct, short-term, less-than-significant adverse impact on air quality.

Additionally, a full General Conformity Determination would not be required for the Proposed Action. Further, a Record of No-Applicability is not required because Gainesville is not located in a non-attainment or maintenance area.

Table 2. Total Construction Emissions

Activity	Projected Year	Criteria Pollutant					
		CO	VOC	NOX	SO2	PM10	PM2.5
		Emissions (tons per year)					
Activity 1a: Infrastructure and MEP Systems (24 months)	**2027**	0.163	0.021	0.013	0.001	0.005	0.003
	2028	0.163	0.021	0.013	0.001	0.005	0.003
Activity 1b: Parking Garage (24 months)	**2028**	2.556	0.384	6.153	0.014	0.334	0.319
	2029	1.993	0.301	4.700	0.012	0.254	0.241
Activity 2: ACA and Supporting Building Demolition (9 months)	**2029**	2.360	0.364	6.124	0.015	0.414	0.322
Activity 3a: New Loop Road (3 months)	**2030**	0.114	0.021	0.153	0.001	0.009	0.007
Activity 3b: Construct HSA (36 months)	**2030**	4.128	0.608	8.344	0.024	0.462	0.437
	2031	3.819	0.568	7.641	0.024	0.424	0.399
	2032	2.204	0.314	2.859	0.012	0.178	0.161
Activity 4: Renovation (12 months)	**2033**	0.44	0.06	0.04	0.00	0.01	0.01
TOTAL PROJECT EMISSIONS		**17.94**	**2.66**	**36.04**	**0.11**	**2.10**	**1.90**
ANNUALIZED AVERAGE TOTAL EMISSIONS (per year, from 2027-2033)		**2.56**	**0.38**	**5.15**	**0.02**	**0.30**	**0.27**
General Conformity *De Minimis* Thresholds[(1)] (40 CFR 93.153(b)(2))		**100**	**100**	**100**	**100**	**100**	**100**

3.4.2.2 Operation

The HSA would be designed and operated to achieve LEED Silver certification, which incorporates more efficient building information management control technologies, resulting in more efficient use of each utility (USGBC, 2022). However, the HSA would place additional demand on the MRVAMC CUP, which would utilize fossil fuels to operate boilers that generate steam, hot water, chilled water, and operate electric pumps to transport potable water to the HSA. The estimated amount of emissions generated from operating the Proposed Action is anticipated to be less than the General Conformity *de minimis* thresholds. These emissions would be considered to have a direct, long-term, less-than-significant adverse impact on air quality.

Operational emissions for the Proposed Action are not included in the General Conformity Applicability Analysis because they are subject to local agency new source review air permitting requirements and are therefore excluded from the General Conformity Applicability Analysis pursuant to 40 CFR 93.153(d)(1). Under this regulation, a conformity determination is not required for the portion of an action that includes major or minor new or modified stationary sources that require a permit under the new source review program or the prevention of significant deterioration program. Based on the final design for the Proposed Action, the selected Architect/Engineer (A/E) of Record would determine whether any new air quality permits would be required to operate the

HSA and/or the boilers used to support the HSA. The HSA would only be commissioned after this review is completed and the appropriate air permits are acquired, if warranted.

3.4.2.3 No Action

Under the No Action Alternative, the ACA and supporting buildings would continue to operate for the foreseeable future and continue to place demand on the MRVAMC CUP for steam, hot water, chilled water, and pressurized potable water. Emissions would continue to be generated from operating the MRVAMC CUP, which provide these utility services to the ACA and other buildings throughout the MRVAMC. Thus, the current emissions generated by the MRVAMC would remain generally unchanged under the No Action Alternative and would continue to have a direct, long-term, less-than-significant adverse impact on air quality.

3.5 Cultural and Historic Resources

VA prepared an Initial Cultural Resources Impact Prediction (ICRIP) report to assess the potential impacts of the Proposed Action on the Area of Potential Effect (APE) in compliance Section 106 of the National Historic Preservation Act. The APE, as defined in 36 CFR 800.16(d), is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." The APE of the Proposed Action is limited to the portion of the MRVAMC property where demolition and construction would occur. The following sections summarize the ICRIP findings.

3.5.1 Existing Conditions

3.5.1.1 Area of Potential Effect

The MRVAMC is surrounded by facilities of the University of Florida (UF), particularly hospitals, clinics, and medical school, with apartment complexes to the south and the UF Veterinary College to the southwest. The entire area is heavily developed with underground utilities, roads, sidewalks, and parking lots. The only undeveloped land consists of small, landscaped areas of lawn, shrubberies, trees, and plants.

3.5.1.2 Architectural Resources

Following the hospital dedication in 1957, the MRVAMC has been expanded and modified with additions. These include new wings, a tower, a Fisher House, utility buildings, offices, and parking facilities. The only above ground historic resource within the APE is the original MRVAMC Building 1, which was built between 1964 and 1967. Although the appearance of Building 1 remains largely the same, the lower floors have been altered by various additions and expansions, including the new tower on the main facade. Overall, the MRVAMC is a standard 20th century modern commercial style with numerous alterations and additions.

3.5.1.3 Archaeological Resources

Two previously recorded archaeological sites are mapped within the MRVAMC immediately adjacent to Archer Road. The Shirea Mound is classified as a prehistoric Native American burial mound, and Shirea Mound Village, which is classified as a Deptford site. Neither site has been evaluated for eligibility to the NRHP. Given the extensive development in this area and widening of Archer Road, it is probable that both sites have been obliterated.

The historic Florida Railroad Corridor, Florida's first railroad line, ran along the south side of Archer Road. Although the corridor is considered eligible for the National Register, all rails and ties from the railroad have been removed throughout the original cross-Florida corridor. The only possible evidence of the railroad in the vicinity of the MRVAMC is a raised area with a bicycle/pedestrian lane adjacent to Archer Road.

3.5.2 Section 106 Consultation

On September 26, 2022, VA initiated Section 106 consultation with the Florida State Historic Preservation Office (SHPO), as well as the following three federally recognized Native American tribes with interests in Alachua County, FL, as listed in the U.S. Department of Housing and Urban Development (HUD) Tribal Directory Assessment Tool (HUD, 2022) and as required under NHPA, Native American Graves Protection and Repatriation Act (NAGPRA), Executive Order (EO) 13007, *Indian Sacred Sites*, and EO 13175, *Consultation and Coordination with Indian Tribal Governments:*

- Miccosukee Tribe of Indians of Florida
- Muscogee (Creek) Nation
- Coushatta Tribe of Louisiana

Additionally, VA initiated Section 106 consultation with the Gainesville Historic Preservation Board (Certified Local Government [CLG]) and offered them an opportunity to participate as a consulting party.

VA's Section 106 consultation letters described the MRVAMC historic district, provided detailed information about the Proposed Action, and identified the Area of Potential Effect (APE) for architectural and archaeological resources. See Appendix A for copies of the letters.

VA included a determination of finding that the Proposed Action would not impact any archaeological or historical resources. This supports a finding of "No Historic Properties Affected" [36 CFR Part 800.4(d)(1)]. Development of the area since 1967 has left little space where archaeological testing could be conducted, and the entire area has been extensively disturbed by construction and landscaping. While the original MRVAMC is old enough to be classified as a historic structure, it does not meet the criteria to be listed on or eligible for the National Register of Historic Places (NRHP).

Neither the SHPO nor the tribes nor the CLG responded to the Section 106 consultation letters. Therefore, per 36 CFR 800.4(d)(1)(i), VA's responsibilities under Section 106 are fulfilled and NHPA compliance has been met for the Proposed Action. Copies of consultation letters and correspondence are provided in Appendix A.

3.5.3 Environmental Consequences

3.5.3.1 Construction and Operation

None of the previously recorded cultural resources would be impacted by the Proposed Action at the MRVAMC. The APE has been so disturbed by buildings, pavement, sidewalks, utilities, and landscaping that no intact archaeological sites remain. Thus, modifications to the MRVAMC would have no mechanism to impact any archaeological or historic resources listed on or eligible for the NRHP.

To ensure that the Proposed Action would avoid impacts to undiscovered cultural resources, VA would implement an "Inadvertent Discovery" plan. Under this plan, if prehistoric or historic

artifacts that could be associated with Native American, early European, or American settlement are encountered at any time within the Proposed Action site, VA would cease all activities involving subsurface disturbance in the vicinity of the discovery. The Florida Department of State, Division of Historical Resources, Compliance Review Section and aforementioned federally recognized Native American Tribes would be contacted, and project activities would not resume without VA's verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work would stop immediately, and the proper authorities notified in accordance with Section 872.05, Florida Statutes

Therefore, construction and operation of the Proposed Action would have no impact on cultural and historic resources.

3.5.3.2 No Action

Under the No Action Alternative, no changes to the existing MRVAMC campus would occur. Therefore, the No Action Alternative would have no mechanism to impact cultural and historic resources.

3.6 Geology, Topography, and Soils

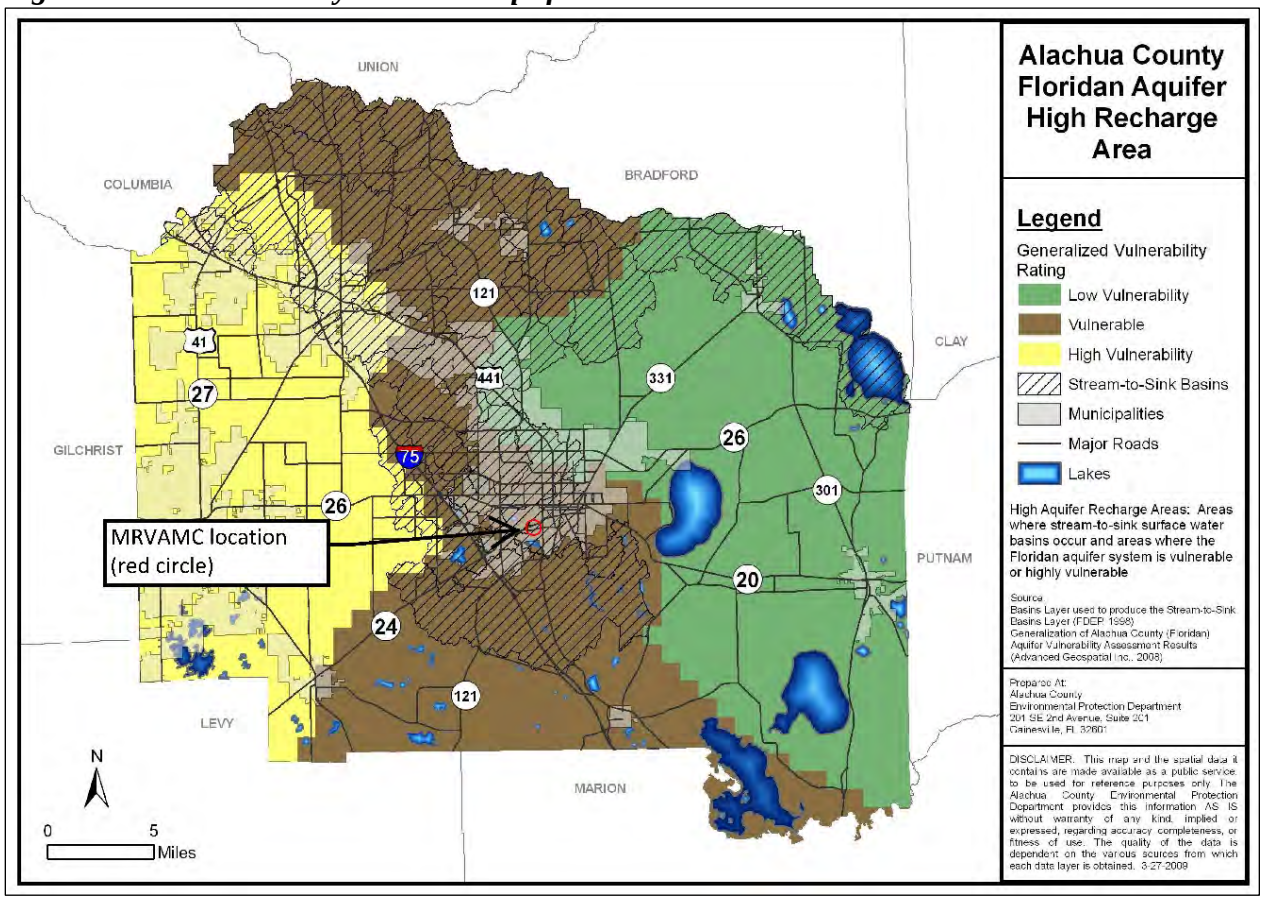
3.6.1 Existing Conditions

3.6.1.1 Geology

According to the USGS Geologic Map of the State of Florida, bedrock on the Site is characterized as Ocala Limestone. The Ocala Limestone consists of nearly pure limestones and occasional dolostones. Bedrock outcroppings are not present at the MRVAMC. Based on the Alachua County Growth Management Division's Alachua County Floridan Aquifer Protection Zones map, the MRVAMC is located in a portion of Alachua County that is listed as having high aquifer recharge zones with a "vulnerable" aquifer assessment rating due to sinkholes and sensitive karst areas (Figure 7) (ACGMD, 2022).

VA's subsurface exploration and geotechnical engineering for the Proposed Action included the advancement of three test borings to depths ranging from approximately 80 to 100 feet below existing site grades. The test boring data suggested there may be porous zones in the limestone and surrounding rock-like materials in the soil profile. None of the borings indicated the presence of very loose or very soft "raveled" zones which can occur above and within the limestone formation due to karst activity such as dissolutioning/erosion of the limestone due to movement of slightly acidic groundwater through the formation over geologic time (VA, 2022d).

Figure 7. Alachua County Floridan Aquifer Protection Zones



3.6.1.2 Topography

Based on the 2021 USGS 7.5-Minute Series Gainesville East Topographic Quadrangle map, the regional topography is generally flat with little relief (Figure 8) (USGS, 2022).

The MRVAMC campus site is relatively flat though generally slopes from north to south, with the east side of the campus higher than the west side, with elevations of the ground surface ranging from approximately 90- to 100-feet above mean sea level (Figure 9). The roadway from the campus entry off of Archer Road is higher and slopes from the first-floor elevation to the basement elevation toward the west side of the main hospital building. There are two stormwater detention ponds and in the western portion of the campus and a 0.2-acre grass-covered detention basin to the south/southwest of the Fisher House. No other substantial topography is present at the MRVAMC.

3.6.1.3 Soils

According to the U.S. Department of Agriculture (USDA) Web Soil Survey, the predominant soil composition at the MRVAMC and within the Proposed Action site is classified by the USDA Natural Resources Conservation Service (NRCS) as Millhopper complex urban land. Other soils at the MRVAMC include Arrendondo fine sand, Arrendondo urban land complex, Kanapaha sand, Pomona sand, Surrency sand, Newnan sand, and Blichton sand. Descriptions and key details of this and less prevalent soil types are presented in Table 3, and a map of soils at MRVAMC is provided in Figure 10.

Soils at the MRVAMC are vegetated with grass, trees, and shrubs. Due to the extensive development throughout the MRVAMC property, it is expected that all surficial soils have been disturbed.

Figure 8. USGS Regional Topographic Map

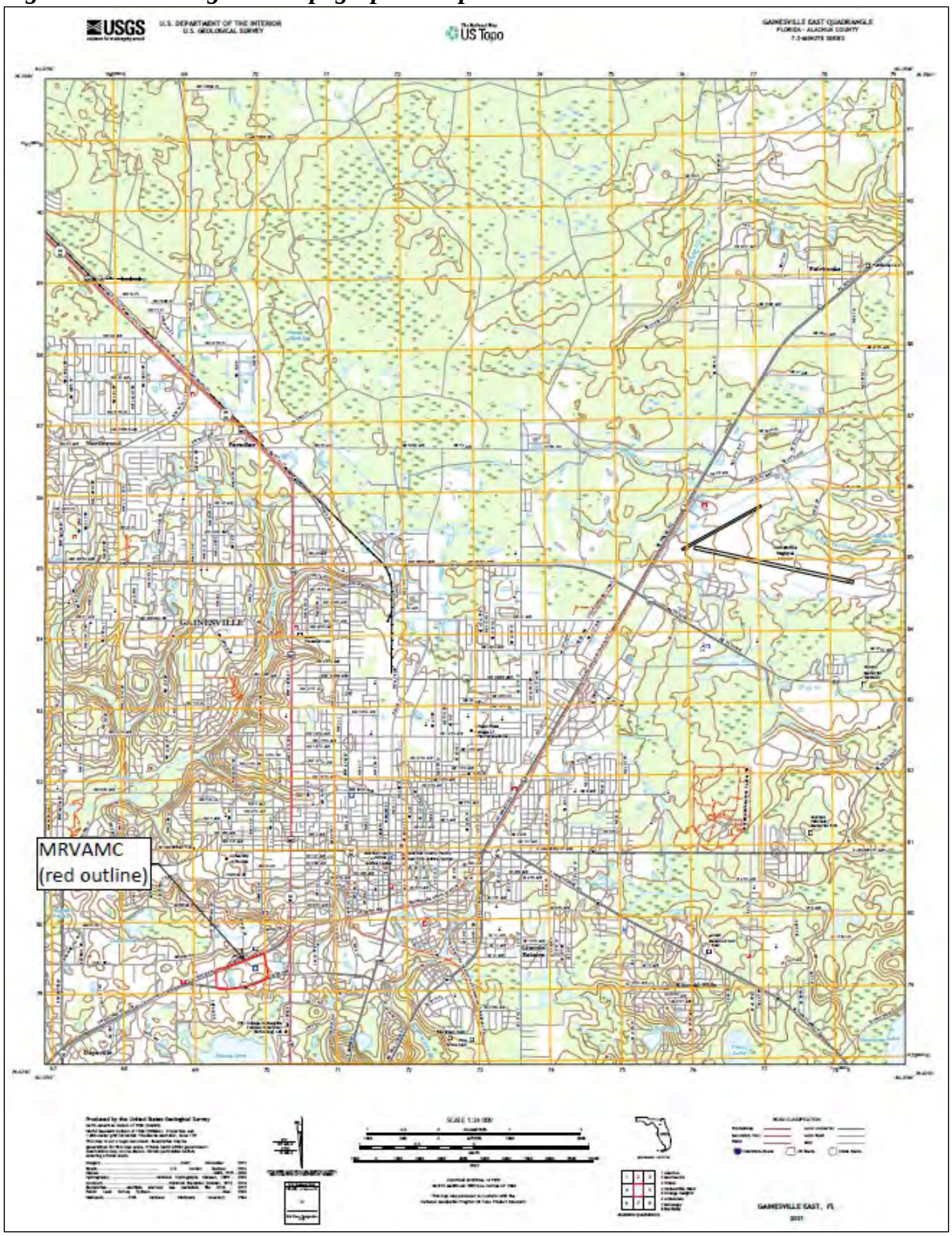
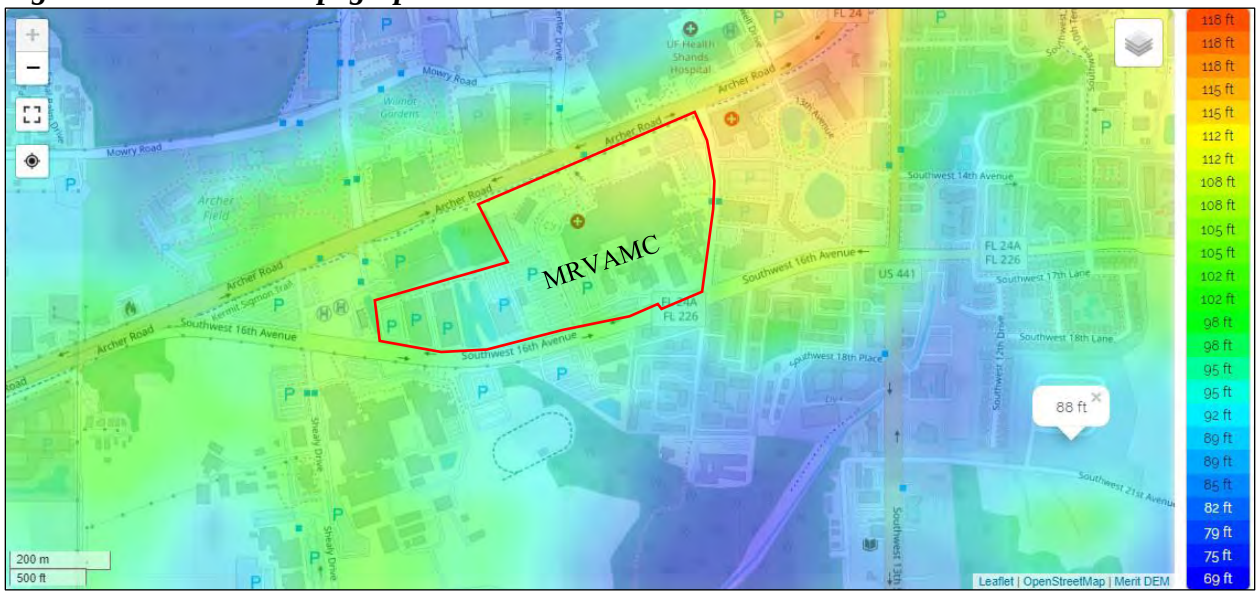


Figure 9. MRVAMC Topographic Visualization



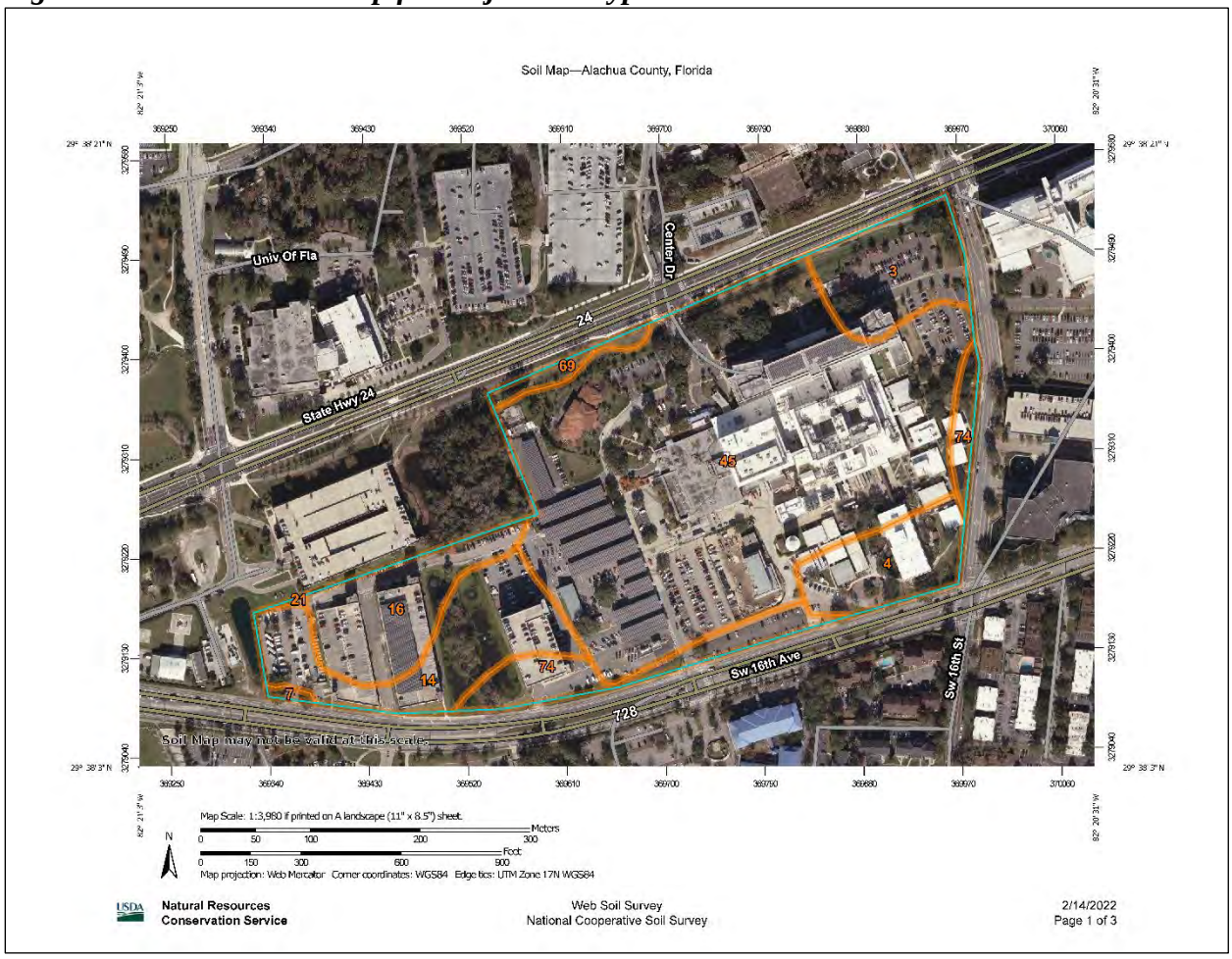
Note: Scale at right represents feet above mean sea level.

Table 3. Applicable USDA NRCS Soil Descriptions and Details

Soil Code	Type	Percent Coverage at MRVAMC	Drainage Classification	Hydrologic Group	Rate of Water Transmission	Typical Profile
45	Urban Land Millhopper Complex	60.2%	Moderately Well	A	Moderately low to high	Fine sand, loamy fine sand, and sandy clay loam
16	Surrency Sand	7.9%	Very Poorly	A/D	Moderately low to high	Sand, and sandy clay loam
14	Pomona Sand	10.8%	Poorly	A/D	Moderately high to high	Sand and sand clay loam
3	Arredondo Fine Sand	1.2%	Very Well	A	Moderately high to high	Fine sand, loamy fine sand, and sandy clay
74	Blichton Sand,	6.2%	Poorly	C/D	Moderately low to moderately high	Sand and sandy clay loam
4	Arredondo-Urban Land Complex	6.1%	Very Well	A	Moderately high to high	Fine sand, loamy sand, and sandy clay loam

Note: The "Soil Codes" in Table 3 are depicted on Figure 10.

Figure 10. USDA-NRCS Map for Major Soil Types at MRVAMC



Note: Refer to the numeric code on the figure to the "Soil Code" column in Table 3.

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3.6.2 Environmental Consequences

3.6.2.1 Construction

3.6.2.1.1 Geology

No active significant faults are known to extend through the subsurface geology at the Proposed Action site. However, VA completed a Tier 1 Seismic Evaluation for the Proposed Action and identified several deficiencies, such as story drift issues, structural overstresses, and concrete column steel reinforcing tie spacing (VA, 2022d). As a result, the A/E would design the Proposed Action facilities to incorporate all required seismic design elements and requirements specified in VA Specification H-18-8: *Seismic Design Requirements*; VA Master Construction Specification 13 05 41: *Seismic Restraint Requirements for Non-Structural Components*; and the Unified Facilities Criteria (UFC 3-310-04), which requires structures, such as the proposed HSA and parking garage, to be designed to resist an earthquake with a 2% Probability of Exceedance (PE) over a 50-year exposure period (i.e. a 2,475-year design earthquake).

Should the selected design require footings or other structural elements to be advanced into bedrock, bedrock removal may include ripping or chipping with a hydraulic hammer. It is

anticipated that blasting of rock would not be allowed, because blasting could cause vibrations that could impact medical services in nearby buildings at the MRVAMC.

The advancement of borings, footings, or removal of bedrock in an area localized to the Proposed Action site would not substantively change geologic conditions at MRVAMC or in the surrounding area.

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.

Therefore, construction of the Proposed Action would have no impact on geologic resources.

3.6.2.1.2 Topography

The Proposed Action would require grading of the site to support the HSA, parking garage, and the new loop road. Minor or partial filling of an existing 0.2-acre stormwater detention basin located to the south/southwest of the Fisher House may be required to allow for the construction of the new loop road. However, the overall topography of the Proposed Action site would remain level and at elevations and grades similar to existing conditions.

Additionally, the A/E would ensure, to the extent practicable, that the site of the HSA matches the elevation of the main hospital building so no finished floor elevations and no internal ramps would be required for the basement and first floors.

Therefore, the Proposed Action would have a direct, long-term, negligible adverse impact on topography.

3.6.2.1.3 Soils

Construction activities associated with site preparation, grading, and excavating for foundations and utilities would remove vegetation and pervious cover (e.g., asphalt), exposing the underlying soil. Exposed soils can be subject to erosion from wind, precipitation, or mechanical means. Erosion can lead to nuisance dust generation and sedimentation of stormwater run-off from the construction site.

To minimize soil erosion, the A/E would apply for, obtain, and implement the terms of the FLDEP NPDES CGP (FLDEP, 2015). The construction contractor would adhere to BMPs specified in the CGP and VA's Specification 01 57 19: *Temporary Environmental Controls*, and would include the following measures at a minimum:

- Install and maintain sedimentation and erosion control measures, including silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, synthetic hay bales, rip-rap, and/or similar physical control structures.
- Retain on-site vegetation to the maximum extent possible.
- Revegetate disturbed areas with native, non-invasive vegetation as soon as construction is completed.

Additionally, the construction contractor would implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impacts of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality. The construction contractors would report releases of regulated quantities of petroleum-based fluids to VA and FLDEP and be responsible for cleanup per state regulatory requirements.

Therefore, with these permit required BMPs in place, construction of the Proposed Action would have a direct, short-term, negligible adverse impact on soil quality.

3.6.2.2 Operation

3.6.2.2.1 Geology, Topography, and Soils

Following commissioning of the HSA and parking garage, operational activities would have no mechanism to impact geology nor topography.

Soils exposed during construction and revegetated would be professionally maintained during operation to prevent exposure and subsequent erosion. Stormwater from the Proposed Action site would also be minimized through engineering controls and improvements to the MRVAMC stormwater management system (described in further detail in Section 3.7). Therefore, stormwater run-off velocities would be minimized, resulting in less likelihood for soils to be eroded.

Therefore, operation of the Proposed Action would have a direct, long-tern, negligible adverse impact on soil quality.

3.6.2.3 No Action

Under the No Action Alternative, no changes to the existing geology, topography, or soils would occur at the MRVAMC. Regular maintenance activities would continue. Therefore, the No Action Alternative would have no mechanism to impact geology, topography, or soils.

3.7 Hydrology and Water Quality

This section focuses on groundwater and natural surface water resources and stormwater management.

3.7.1 Existing Conditions

3.7.1.1 Groundwater

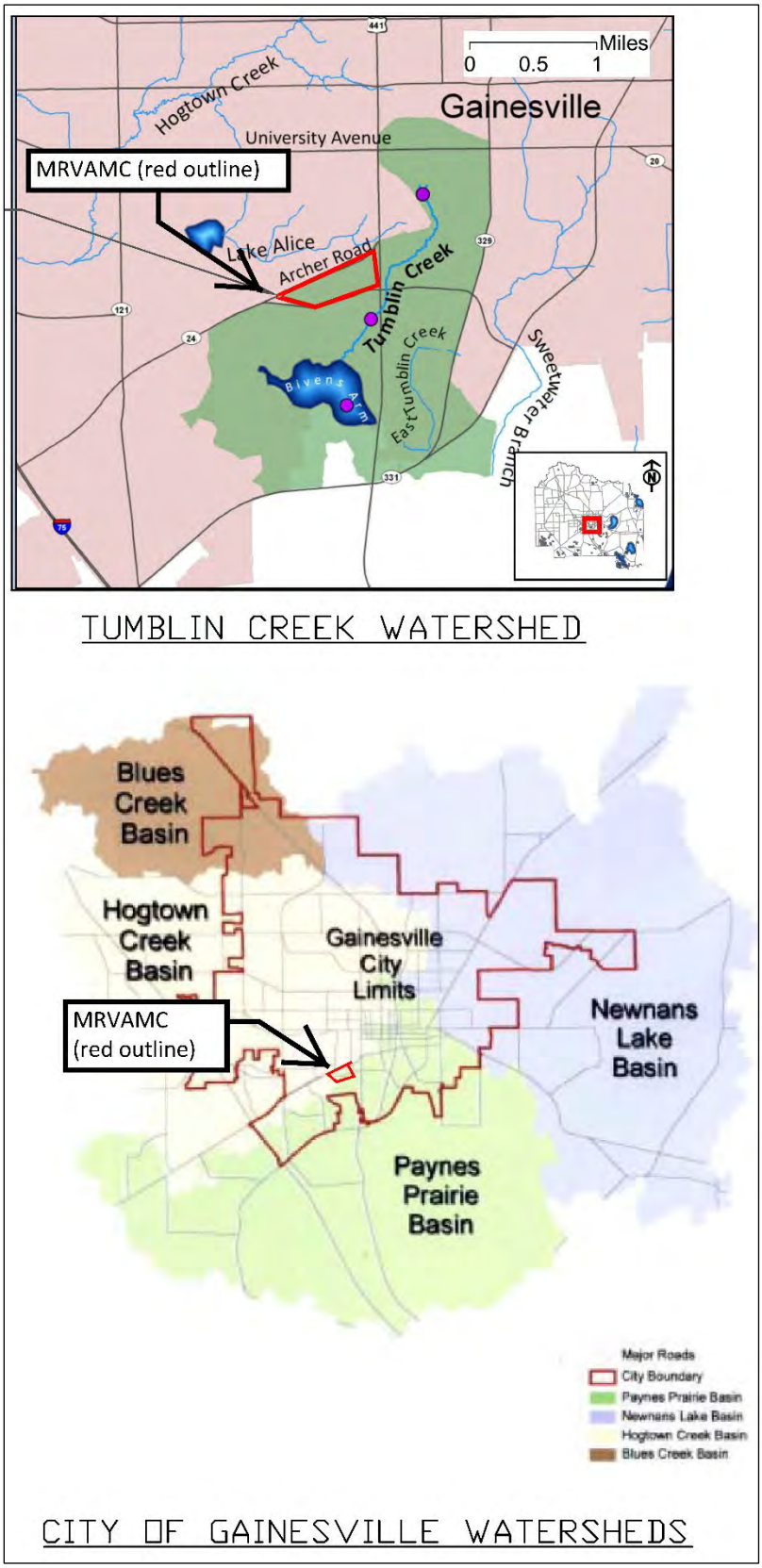
The regional direction of groundwater flow is assumed to flow to the southwest, generally following surface topography. Actual groundwater flow direction underlying the MRVAMC may vary due to the presence of underground utilities such as sewers, storm drains, and heterogeneous subsurface soil conditions. The USGS reported the depth to groundwater at approximately 135-feet below land surface in the nearest monitoring well to the MRVAMC located approximately 6 miles northeast of the MRVAMC and installed in the Floridan aquifer system) (USGS, 2022). Groundwater beneath the MRVAMC is anticipated to be at a similar depth.

As previously described in Section 3.6.1.1, the MRVAMC is located in a portion of Alachua County that is listed as having high aquifer recharge zones with a “vulnerable” aquifer assessment rating due to sinkholes and sensitive karst areas (ACGMD, 2022).

3.7.1.2 Natural Water Bodies

There are no natural surface water bodies present at the MRVAMC. The nearest natural surface water bodies located in the vicinity of the MRVAMC include: Tumblin Creek, Bivens Arm Lake, and Lake Alice (Figure 11) (VA, 2022c). Regionally, the MRVAMC is located in the Tumblin Creek Watershed, which is located within the Paynes Prairie Basin.

Figure 11. Watersheds and Basins Associated with MRVAMC



3.7.1.3 MRVAMC Stormwater Management

Stormwater is defined as rainwater that runs off streets, lawns, and other sites. Stormwater when filtrated into soil, ultimately replenishes aquifers or flows through the ground into streams and rivers. Stormwater management is a process of directing excess water that is not absorbed into soil to a location to prevent flooding and erosion.

The MRVAMC topography divides the campus into four distinct watersheds, as depicted in Figure 12 (VA, 2022c). As such, stormwater that does not infiltrate into soil will flow into one of the four watersheds.

Watershed 1 is approximately 5.71 acres and situated in the western portion of the campus. This watershed collects stormwater from the westernmost portion of the campus including from Glory Lot, Independence Garage, Freedom Garage.

Watershed 2 is approximately 18.0 acres and situated in the central-western portion of the campus. The watershed collects stormwater from Liberty Garage, Liberty Lot, Victory Lot, Patriots Lot, Remembrance Lot, Eagle Lot, Dignity Lot, the western portion of the Honor Lot.

Watershed 3 is approximately 11.4 acres and situated in the central-eastern portion of the campus. The watershed collects stormwater from the Ambulatory Care Building, E-Wing Building, Building 1, Bed Tower, CLC, and the trailers (Buildings T-1A, T-1B, T-3, T-7, T-8, T-9, T-10) on the southern portion of the campus, as well as the eastern portions of the Honor and Heritage Lots.

Watershed 4 is approximately 6.5 acres and situated in the eastern portion of the campus. The watershed collects stormwater from east of Building 1 to the campus boundary, including from Buildings 8, 11, 14, T-2, T-4, T-5, T-6, and T-11, as well as from Victory Lot and Tribute Lot.

Stormwater from watersheds 1 and 2 flows into two constructed stormwater detention ponds on the western portion of the MRVAMC. Prior to entering these basins, it may also flow into an approximately 0.18-acre grass-covered detention basin located south/southwest of the Fisher House; this grass-covered basin has an overflow weir that discharges into the two larger basins. The east stormwater basin is approximately 27,750 square feet with a maximum depth of 6 feet. The west stormwater basin is approximately 23,080 square feet with a maximum depth of 6 feet. Both basins connect to a drainage easement owned by the Florida Department of Transportation (FDOT). Stormwater then exits the campus and flows into the FDOT MS4 culvert beneath SW 16th Avenue, then continues flowing south into a canal and ultimately discharges to Bivens Arm Lake, which is located approximately 0.5 miles south of the campus. Bivens Arm overflows onto Payne's Prairie and ultimately discharges to the aquifer via Alachua Sink (VA, 2022c).

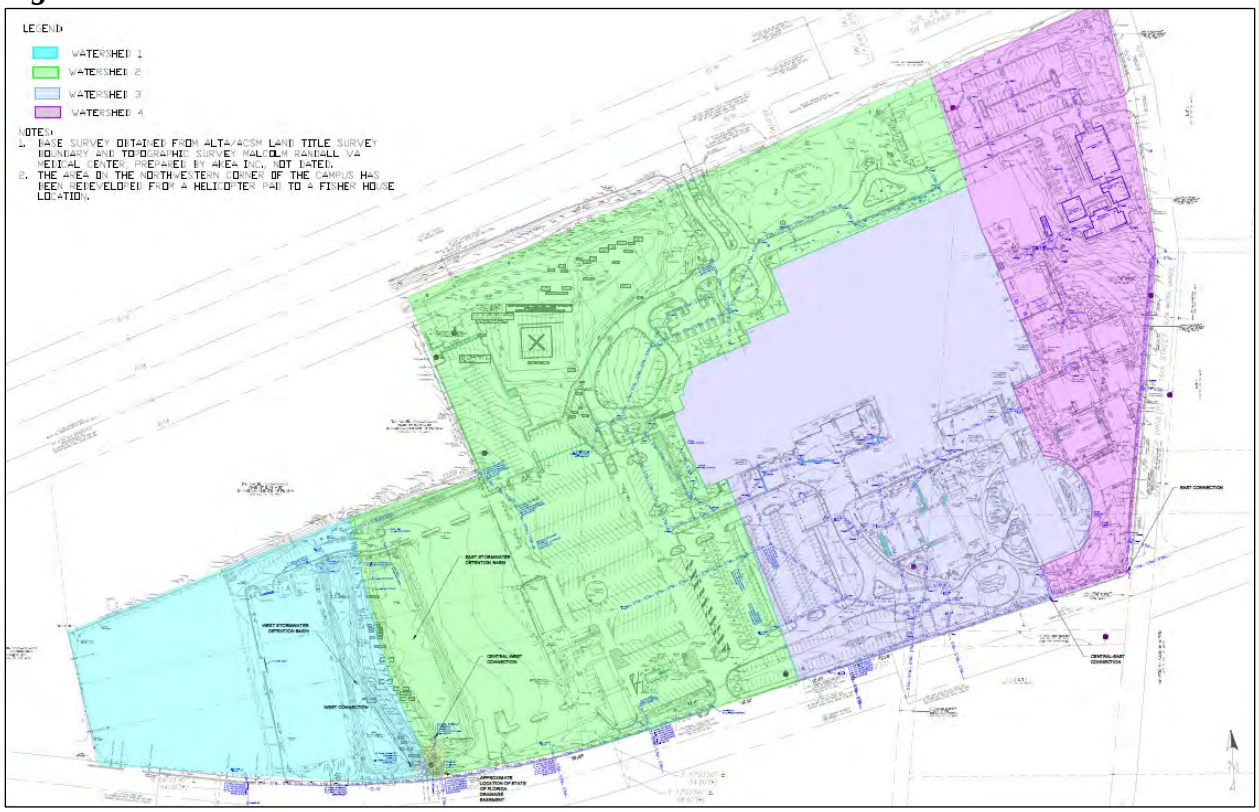
Stormwater from watersheds 3 and 4 MRVAMC watersheds is routed in underground piping to the southeast portion of the campus, where the stormwater flows into the FDOT MS4 18-inch-diameter reinforced concrete pipe that also ultimately discharges to Bivens Arm Lake (VA, 2022c).

A search of FLDEP and municipal agency stormwater databases did not identify MRVAMC as being permitted under any MS4 program or other federal, state, or municipal stormwater program.

The stormwater system consists of two constructed stormwater detention basins are present on the western portion of the campus. Stormwater from the central-western portion of the campus flows into these basins. The east stormwater basin is approximately 27,750 square feet with a maximum depth of 6 feet. The west stormwater basin is approximately 23,080 square feet with a maximum depth of 6 feet. Both basins connect to a drainage easement owned by the Florida Department of

Transportation (FDOT). The stormwater then flows south, beneath SW 16th Avenue, and ultimately discharges to Bivens Arm Lake, which is located approximately 0.5 miles south of the campus.

Figure 12. MRVAMC Watersheds



3.7.1.3.1 Stormwater Regulations

A search of FLDEP and municipal agency stormwater databases did not identify the MRVAMC stormwater system and its discharges as being permitted under any MS4 program or other federal, state, or municipal stormwater program (VA, 2022c).

The following sections describe state and municipal stormwater management programs that may be potentially applicable to the current and/or future MRVAMC stormwater management systems.

The State of Florida Phase II MS4 permit requires that a program be put in place to monitor the quality of the stormwater, sources of pollutants, and surface water bodies negatively affected by stormwater pollutants (VA, 2022c).

Alachua County identifies water bodies in the county that are impaired because they do not meet applicable state water quality standards. Total Maximum Daily Loads (TMDLs) and Basin Management Action Plans (BMAPs) have been adopted by the FLDEP for these waters. The Alachua County Phase II MS4 permit (FLR04E005) requires the implementation of management actions to reduce pollutant loadings to these impaired water bodies. Future development or redevelopment projects discharging into impaired waterbodies in Alachua County may require a net improvement for treatment of stormwater discharges. Alachua County defines net improvement for nitrogen and phosphorus loading in the Basin Specific Performance Standard (VA, 2022c).

The City of Gainesville's MS4 Permit authorizes discharge of stormwater from Phase II MS4s to surface waters of the State pursuant to the FLDEP NPDES stormwater program. Permit compliance includes the implementation of BMPs as well as development and implementation of a stormwater management program to reduce the discharge from Phase II MS4s to surface waters of the State to the maximum extent practicable. Should any future stormwater discharge connections or new discharges from the MRVAMC be necessary, compliance with the City's MS4 permit and the City of Gainesville's *Engineering Design & Construction Manual Chapter 4: Stormwater Management* may be required at the time when the connection or discharges are anticipated to occur (VA, 2022c).

3.7.2 Environmental Consequences

3.7.2.1 Construction

3.7.2.1.1 Groundwater

The need for significant groundwater control is not anticipated for general site preparation and foundation construction activities because the depth to groundwater at the MRVAMC is anticipated to be at least 100-feet below ground surface (USGS, 2022), which is below the anticipated depth of building footings.

However, perched groundwater is often encountered at the existing fill/natural soil interface, within existing fill, at the overburden soil interface or within seams. Additionally, groundwater level fluctuations can occur due to seasonal variations in the amount of rainfall, runoff, and other factors that may influence localized groundwater depths.

As a result, the A/E would consider the possibility of encountering perched groundwater and groundwater level fluctuations when developing the design for the Proposed Action. Long-term observations in piezometers, or observation wells sealed from the influence of surface water, are often required to define groundwater levels in profiles of this type. Additionally, basement design and construction would consider the need for waterproofing, as well as a positive permanent drainage system (VA, 2022d). Further, if the HSA or other infrastructure have deeper basement levels that require drainage control structures and utility pipes, the A/E would implement groundwater control measures to facilitate bearing surface preparation and backfilling operations.

Construction vehicles and equipment utilize petroleum-based fluids that, if accidentally released, could migrate through soil and into the underlying groundwater. To minimize the probability of a release, equipment would be maintained in good working order according to the manufacturer's requirements. Construction vehicles would be equipped with spill kits to remediate surficial releases of petroleum-based fluids, and contractors would be properly trained to use these kits. Should a release occur, the construction contractor would deploy the spill kit and notify MRVAMC and FLDEP immediately. This would help to ensure that a release of petroleum-based fluids would not cause more than a direct, short-term, negligible adverse effect on groundwater quality.

Therefore, the Proposed Action would have a direct, short-term, negligible adverse impact on groundwater quality.

3.7.2.1.2 Stormwater Management

The A/E would complete pre-construction planning to ensure that the MRVAMC stormwater infrastructure remains functional and complaint with all federal, state, and municipal stormwater regulations and permits.

Additionally, because the Proposed Action would disturb greater than one acre of contiguous land during construction, the A/E would apply for, obtain, and implement the terms of the Florida Department of Environmental Protection (FLDEP) National Pollutant Discharge Elimination System (NPDES) Generic Permit for Stormwater Discharge from Large and Small Construction Activities (CGP), including best management practices (BMPs) specified in the Stormwater Management Plan (SWPPP) to minimize stormwater volume and velocity, soil erosion, and sedimentation of stormwater runoff from the Proposed Action site. Based on the final design of the Proposed Action, the A/E would also obtain any operational stormwater management permits required by FLDEP and the City of Gainesville and ensure any modifications to the MRVAMC stormwater system comply with the City of Gainesville *Engineering Design & Construction Manual Chapter 4: Stormwater Management*. This approach is consistent with USEPA Region 4's recommendation in response to VA's request for early input on the Proposed Action regarding stormwater management (Appendix A).

The Proposed Action would also be designed to comply to the maximum extent technically practicable with EISA Section 438.

All permit-required stormwater management measures would be implemented and maintained throughout the duration of construction to minimize soil erosion and sedimentation of runoff.

Therefore, construction is anticipated to have a direct, short-term, negligible adverse impact on stormwater quality.

3.7.2.2 Operation

3.7.2.2.1 Groundwater

Operation of the Proposed Action has no mechanism to impact groundwater. The groundwater underlying the MRVAMC would not be extracted for potable or other uses. Potable water would continue to be obtained from the City of Gainesville. The Proposed Action would not change regional groundwater recharge rates, flow patterns, or elevations.

Therefore, operation of the Proposed Action would have no impact on groundwater quality.

3.7.2.2.2 Stormwater Management

The conceptual design for the Proposed Action has a slight larger area of impervious surface compared to the current campus, because the new loop road would require removing a small grass-covered drainage ditch in the northwestern portion of the campus. As a result, the Proposed Action may generate more stormwater compared to the current MRVAMC.

During operation, MRVAMC personnel would operate and integrate any new stormwater management infrastructure constructed to support the Proposed Action into the overall maintenance program for other MRVAMC stormwater system infrastructure. Should the MRVAMC also be required to obtain state or municipal permits to operate the stormwater management system in order to commission the Proposed Action, then the MRVAMC would obtain those operational permits and comply with the permit requirements. This would ensure the stormwater infrastructure functions according to its design requirements and meets all applicable operational stormwater permit requirements.

Therefore, operation of the Proposed Action would have a direct, long-term, negligible adverse impact on stormwater quality because of the anticipated increase in stormwater volume.

3.7.2.3 No Action

Under the No Action Alternative, no changes to the existing groundwater and hydrology/stormwater conditions would occur at the MRVAMC. No new impervious areas would be created and stormwater runoff would continue to infiltrate into vegetated ground and/or enter the existing MRVAMC infrastructure. Routine maintenance and any future upgrades to stormwater infrastructure would occur. Therefore, the No Action Alternative would have no mechanism to impact groundwater or hydrology/stormwater.

3.8 Coastal Zone Management

3.8.1 Existing Conditions

The Coastal Zone Management Act (CZMA) was enacted in 1972 to preserve, protect, develop, and, where possible, restore and enhance the resources of the nation's coastal zone. The CZMA requires that any federal actions affecting any land or water use, or natural resource of the coast be consistent with the enforceable policies of a state's federally-approved coastal management program.

The U.S. Department of Commerce National Oceanic and Atmospheric Administration (NOAA) approves coastal management programs. The Florida Coastal Management Program (FLCMP) was approved by NOAA in 1981 and is codified at Chapter 380, Part II, FS. The Florida coastal zone is the entire state but is divided into two tiers. Gulf and Atlantic coastal cities and 35 counties are those which include or are contiguous to state water bodies where marine species of vegetation constitute the dominant plant community.

Although Alachua County (where MRVAMC is located) is not designated as a coastal county, a consistency evaluation is required by the FLCMP in coordination with the environmental review process per Section 373.428, F.S.

The Florida State Clearinghouse (SCH) administers the intergovernmental coordination and review process for federal projects. The SCH is Florida's single point of contact for coordinating state agencies reviews. The Draft EA has been made available to SCH to initiate the review for consistency with the FLCMP. SCH's findings will be included in the final SEA.

3.8.2 Environmental Consequences

3.8.2.1 Construction and Operation.

The Proposed Action incorporates construction BMPs that reduce soil erosion and minimize sedimentation of stormwater run-off in accordance with FLDEP NPDES-required BMPs. These measures prevent adverse impacts to downstream water quality and coastal zone resources. Additionally, there are no coastal zone resources within the MRVAMC property, which is entirely developed. Therefore, the Proposed Action operations, which would occur entirely within the MRVAMC property, have no mechanism to directly impact coastal zone resources.

Therefore, VA has determined that the Proposed Action would be consistent with the FLCMP and that construction and operation of the Proposed Action are not anticipated to adversely affect any Florida coastal zone resources.

Results from the Florida SCH CZMA consistency review will be included in the Final EA.

3.8.2.2 No Action

Under the No Action Alternative, no changes to the existing features at the MRVAMC would occur. Therefore, the No Action Alternative would have no mechanism to impact coastal zone resources.

3.9 Noise and Vibration

3.9.1 Noise

Noise is traditionally defined as unwanted sound that interferes with normal activities in a way that reduces the quality of the environment. Magnitudes of sound, whether wanted or unwanted, are usually described by sound pressure. There are two primary types of sound sources that generate noise: stationary and transient. Sounds produced by these sources can be intermittent or continuous. A stationary source is usually associated with a specific land use or site, such as construction activities or the operation of generators. Transient sound sources, such as vehicles and aircraft, move through the area. The human auditory system is sensitive to fluctuations in air pressure above and below the barometric static pressure. The loudness of sound as heard by the human ear is measured on the A-weighted decibel (dBA) scale.

Sound pressure levels are quantified in decibels (dB), which is dependent on both frequency and intensity, and is given a level on a logarithmic scale. The way the human ear hears sound intensity is quantified in A-weighted decibel (dBA), which are level "A" weights according to weighting curves. Sound levels for common activities and construction work are presented in Table 4. Noise levels and durations from these activities would vary depending on the specific equipment being used, and the impact from this noise on a receptor would depend on the distance between the receptor and the source of the noise. Generally, noise levels decrease by approximately 6 dBA for every doubling of distance for point sources (such as a single piece of construction equipment), and approximately 3 dBA for every doubling of distance for line sources (such as a stream of motor vehicles on a busy road at a distance).

Table 4. Common Sound Levels and Exposure Conditions

Source	Decibel Level	Exposure Concern
Soft Whisper	30	Normal safe level
Quiet Office	40	
Average Home	50	
Conversational Speech	65	
Highway Traffic	75	May affect hearing in some individuals depending on sensitivity, exposure length, etc.
Noisy Restaurant	80	
Average Factory and Construction Equipment Vehicles	80-90	
Pneumatic Drill	100	
Automobile Horn	120	
Jet Plane	140	Above 140 decibels may cause pain.
Gunshot Blast	140	

3.9.2 Vibration

Vibration is the motion of the ground transmitted into a building that can be described in terms of displacement, velocity, or acceleration (Metro Council, 2015). Vibration velocity (VdB) is used to

describe vibration because it corresponds well to human response to environmental vibration. Vibration is defined by the maximum vibration level during a given event. Human sensitivity to vibration increases with increasing numbers of events during the day. Vibration velocity is defined by the following terms:

- **Level:** Vibration is expressed in vibration decibels (VdB). And represents how much the ground is moving. The threshold of human perception to vibration is approximately 65 VdB and annoyance begins to occur for frequent events at vibration levels over 70 VdB.
- **Frequency:** Vibration frequency is expressed in Hertz (Hz). Human response to vibration is typically from approximately 6 Hz to 200 Hz.
- **Time Pattern:** Environmental vibration changes all the time and human response is correlated to the number of vibration events during the day.

3.9.3 Existing Conditions

3.9.3.1 Noise

Sensitive noise receptors are defined as properties where frequent human use occurs and where a lowered noise level would be of benefit. Hospitals, schools, convalescent facilities, religious institutions, libraries, recreation areas, and residential areas are considered to be sensitive receptors, particularly when located within 0.25 miles of the noise source.

Sensitive noise receptors in the immediate vicinity of the Proposed Action include patients in the main building. The MRVAMC campus is surrounded primarily by UF buildings and parking lots. Somerset Village, a condominium complex, is the nearest residence at 0.11 miles south of the loop road. The other nearest off-campus sensitive receptors are: UF Health Shands Children's Hospital, approximately 0.4 miles northeast of the MRVAMC; the Ronald McDonald House, approximately 0.7 miles southeast; UF Health Pediatrics – Gerold L. Schiebler CMS Center, approximately 0.3 miles south; UF Health Pediatric Specialties and UF Health Internal Medicine Medical Plaza, approximately 0.3 miles north; UF Health Heart & Vascular Hospital, approximately 0.3 miles east; and the UF Health Pediatric Emergency Room, approximately 0.3 miles northeast.

The soundscape at the Proposed Action site is typical of a modern VA Medical Center or other active hospital campus. It is dominated by noise from passenger cars, buses, and various types of commercial trucks. Noise from building operations, such as generators and heating/ventilation and air conditioning ("H/VAC") systems equipped with noise-dampeners/mufflers, or a noise-shielding structure, contribute to the soundscape to a lesser extent. No other notable noise-generating sources are present in the vicinity of the Proposed Action site.

External noise sources that can be heard within the MRVAMC include vehicle traffic on SW Archer Road and SW 16th Avenue.

3.9.3.2 Vibration

Normal facility operations and vehicle traffic within the MRVAMC do not cause vibrations that impact sensitive receptors within the MRVAMC or in the surrounding community.

3.9.4 Environmental Consequences

3.9.4.1 Construction

3.9.4.1.1 Noise

Construction of the Proposed Action activities would generate noise from equipment used during building demolition, site grading, and vertical construction. Typical construction equipment involved in the Proposed Action may include excavators, cranes, backhoe-loaders, welders, aerial lifts, graders, pavers/paving equipment, rollers, haul trucks, and concrete mixing trucks. Once mobilized to the site, construction equipment would be operated within the work site in the western portion of the MRVAMC.

Construction noise levels would vary depending on the type of equipment being used at the time. Table 5 summarizes the predicted noise levels (at a distance of 50 feet from the source) for common construction equipment (FTA, 2018).

Table 5. Predicted Noise Levels for Construction Equipment

Construction Equipment	Predicted Noise Level at 50 feet (dBA)
Welding generator	71–82
Backhoe	72–93
Roller	73–75
Concrete mixer	74–88
Crane	75–87
Grader/Dozer	80–93
Jackhammer	81–98
Truck	83–94
Paver	86–88

The noise from demolition and construction equipment would be localized and intermittent during the Proposed Action construction. Intermittent loud noises, likely generated from machinery involved in demolition or installing building foundation footings, would be isolated to the area where that specific activity is occurring and anticipated to range from approximately 90 to 100 dBA.

The sound levels experienced by human receptors would vary depending on distance from the noise source. Sound levels decrease approximately 6 dBA with every doubling of distance. Therefore, the predicted sound levels that a receptor might experience would vary depending on their distance from the construction site, as shown in Table 6 (assuming construction activity generates noise at 90-100 dBA). These predicted sound levels are for outdoor environments and assume there are no obstructions between the noise source and the receptor. The predicted sound levels would be expected to be at least 15-25 decibels lower than the outdoor levels at the same distance.

Table 6. Predicted Noise Levels Based on Distance from Source

Distance from Noise Source (feet)	Predicted Noise Level (dBA)
50	90 to 94
100	84 to 88
150	81 to 85
200	78 to 82
400	72 to 76
800	66 to 70
1,500	Less than 64

The distance between the Proposed Action construction site and other occupied buildings and parking areas at the MRVAMC ranges from approximately 5 to 300 feet. For visitors and staff who are temporarily outdoors and on the western portion of the MRVAMC where the construction activities would occur, noises from active demolition and exterior building construction would be audible but temporary.

The sound levels from construction activities would be minimally audible to staff and patients in the MRVAMC bed tower due to distance and the presence of physical barriers, such as interior building walls, and interior ambient sounds within the patient rooms. As a management measure, and because sensitive receptors include MRVAMC medical areas sharing walls with the ACA, the MRVAMC facilities staff would provide medical and administrative staff with advance information on the schedule for demolition and construction; activities and expected noise levels; and duration of activities.

Construction workers who are in close proximity to construction equipment may be exposed to noise levels above 90 dBA, which is the permissible exposure level defined by the U.S. Occupational Safety and Health Administration (OSHA). The construction contractor would provide hearing protection to all workers who may be exposed to these noise levels.

To further minimize noise impacts to staff and visitors at the MRVAMC, the construction activities would take place during daylight hours and during weekdays, unless there are specific activities that needed to be completed outside of this schedule to avoid impacting the staff, visitors, and patients at the MRVAMC. Should such activity be necessary, the MRVAMC Public Information Office (or via NF/SGVHS) would notify sensitive receptors in advance of the work taking place. The construction contractor would also implement administrative and engineering noise controls according to VA Specification *01-57-19 Temporary Environmental Controls* in the VA Technical Information Library (VA, 2014). The contractor would also comply with the City of Gainesville noise ordinance (Chapter 15), which establishes maximum sound levels and durations from continuous and impulsive noise-generating activities for commercial land uses (City of Gainesville, 2022).

Additional measures to minimize noise impacts implemented by the construction contractor would include:

- Using shields or other physical barriers to restrict noise transmission.
- Providing soundproof housings or enclosures for noise producing machinery.
- Using efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified.
- Conducting truck loading, unloading, and hauling operations so that noise is kept to a minimum.

- Selecting material transportation routes as far away from sensitive receptors as possible.
- Shutting down noise-generating heavy equipment when it is not needed (do not allow equipment to idle for more than three minutes).

Therefore, construction of the Proposed Action would have a direct, short-term, less-than-significant adverse impact on noise-sensitive receptors at the MRVAMC and a negligible impact on the surrounding community.

3.9.4.1.2 Vibration

Demolition of buildings and other infrastructure would cause various degrees of ground vibration, depending on the equipment, methods employed, and soil compactness, but the vibrations diminish in strength with distance (Hanson, 2006). The vibration velocity level experienced at a receptor located more than 230 feet from the vibration source (except impact pile driving) would diminish below the 65-VdB threshold of perception by humans and interference with vibration-sensitive activities.

From a vibration standpoint, a jackhammer would be the most likely to create vibrational impacts. At a distance of 75 feet from the jackhammer, the vibration level, measured in peak particle velocity, would be 0.01 inches per second. The threshold of perceptibility is 0.08-0.019 inches per second. Thus, vibration levels would be nearly imperceptible by a receptor located 50 feet or more away from the jackhammering.

Should pile driving be required to help shore the ground and support the HSA and parking garage, the construction contractor would implement all necessary precautions to reduce the potential for vibration impacts to any medical operations elsewhere in the MRVAMC. The construction contractor would coordinate in advance with the MRVAMC Director to ensure the timing of such activity does not impact any ongoing vibration-sensitive medical activities.

Therefore, construction of the Proposed Action would have a direct, short-term, negligible adverse impact on vibration-sensitive receptors at the MRVAMC and no impact to the surrounding community.

3.9.4.2 Operation

3.9.4.2.1 Noise

The Proposed Action would generate noise from operating the HSA, parking garage, and new loop road. The types of noises and noise levels generated from these elements would be similar to those currently generated at the MRVAMC. These operational noises would be generated from passenger vehicles traveling on the new loop road and entering and existing the parking garage and any air handling equipment, which the A/E would design and locate to minimize noise impacts to occupants of the HSA and other buildings at the MRVAMC.

Therefore, operation of the Proposed Action would have a direct, long-term, negligible adverse impact on noise-sensitive receptors at the MRVAMC and no impact on the surrounding community.

3.9.4.2.2 Vibration

The Proposed Action would have no mechanism to create vibrations that would disrupt medical or administrative operations at any of the MRVAMC buildings.

Therefore, operation of the Proposed Action would have no impact on vibration-sensitive receptors at the MRVAMC or in the surrounding community.

3.9.4.3 No Action

Under the No Action Alternative, no changes to the existing soundscape and vibration conditions would occur at the MRVAMC. Therefore, the No Action Alternative would have no mechanism to impact noise- or vibration-sensitive receptors.

3.10 Solid Waste and Hazardous Materials

3.10.1 Existing Conditions

3.10.1.1 Phase I Environmental Site Assessment

VA conducted a Phase I Environmental Site Assessment (ESA) for the Proposed Action in February 2022 (VA, 2022b). No recognized environmental conditions (RECs) were identified within the Proposed Action site. Two historical RECs were associated with releases of petroleum, which were remediated by excavating and disposing of the contaminated soil offsite.

3.10.1.2 Regulated Building Materials

The buildings scheduled for demolition as part of the Proposed Action, as detailed in Section 2.2.1, are the ACA; Buildings 25 and 29; Building 40 and adjacent generator; the CUP in the mechanical, electrical, and plumbing (MEP) Wing (Building M); and outbuilding structures 26 and 27.

From February 22 through February 25, 2022, VA contracted with a specialized firm to collect samples of suspect ACM and LCP from selected building areas that may be impacted by the Proposed Action (VA, 2022a). Samples were collected from all accessible interior and exterior areas of the ACA, Building 25, Building 29, Building 40, Water Tank, and Trailers: T1A, T3, T7, T8, T9, and T10. Selected areas of the main hospital building including the E-, C-, and K-Wings, were also sampled. The selected areas in the E- and C-Wings included perimeter rooms on the basement and 1st floors that may be renovated or impacted by the planned demolition of the ACA. However, the CUP in the MEP Wing and the outbuilding structures scheduled for demolition were not inspected for ACM or LCP.

The ACM inspection was conducted in accordance with USEPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations (ref.: 40 CFR, Part 61), following criteria established for identifying ACM that may be impacted by planned renovation activities; applicable protocols established by the Asbestos Hazard Emergency Response Act (AHERA) (ref.: 40 CFR 763).

The LCP inspection included visual identification of homogenous paint applications sampling of the paint(s). While the U.S. Department of Housing and Urban Development (HUD) promulgates guidelines for LCP inspections in child occupied facilities, there are no formal guidelines for non-HUD regulated inspections. Thus, the LCP inspection was conducted in accordance with generally accepted industry standards and practices.

The February 2022 survey report stated that no ACM or assumed ACM was present in the ACA or Buildings 25, 29, and 40 (VA, 2022a). However, ACM or assumed ACM was identified in the E-Wing, which would be impacted by the demolition of the adjoining ACA. The report also stated that LCP was present in Building 25 and was assumed to be present in an inaccessible area of the existing ACA.

VA conducted a data gap analysis of the February 2022 survey report and determined that, prior to performing any demolition activities for the Proposed Action, the construction contractor would need to perform additional sampling for ACM and LCP to ensure that building materials are properly characterized and segregated prior to demolition and subsequently disposed of properly (VA, 2022e). Table 7 details additional ACM sampling to be completed prior to any demolition, renovation, or construction activities. Table 8 details the additional sampling to be done for LCP.

Table 7. Additional ACM Sampling to be Conducted Prior to Proposed Action

Buildings to Be Demolished as Part of Proposed Action	Additional Areas to Be Sampled
ACA; E Wing perimeter rooms adjacent to the ACA; C Wing perimeter rooms adjacent to the MEP Wing; Building 25; Building 29; Building 40 and adjacent generator; CUP in the MEP Wing; Outbuilding Structure 26; Outbuilding Structure 27	Roof, roof flashings, caulking, duct sealant, wall/pipe chases, and above hard ceilings

Table 8. Additional LCP Sampling to be Conducted Prior to Proposed Action

Buildings to Be Demolished as Part of Proposed Action	Additional Areas to Be Sampled
ACA; E Wing perimeter rooms adjacent to the ACA; C Wing perimeter rooms adjacent to the MEP Wing; Building 25; Building 29; Building 40 and adjacent generator; CUP in the MEP Wing; Outbuilding Structure 26; Outbuilding Structure 27	Painted windows, doors, floors, radiators

3.10.1.3 Polychlorinated Biphenyls

VA determined that a pre-demolition survey would be necessary for polychlorinated biphenyls (PCBs) (VA, 2022e). PCBs may be present in caulk used around windows, door frames, masonry columns, and other masonry building materials in buildings constructed or renovated prior to 1978. PCBs may also be present in transformers, capacitors, fluorescent light ballast, other oil-containing equipment, and in other building materials (e.g., paint, roofing, flooring, insulation). Thus, prior to demolition, a survey would be performed for PCBs on behalf of VA by the A/E. The survey results would allow VA to ensure that the construction contractor uses the appropriate disposal methods to comply with FLDEP and USEPA guidance regarding disposal of polychlorinated biphenyls (PCB) bulk waste, should PCBs be present in the building materials to be demolished.

3.10.1.4 Radiological Waste

Radiological wastes are produced from research activities within Building 1. Radiological waste is temporarily stored in Building 27 prior to transport off-site for disposal by a licensed contractor.

3.10.2 Environmental Consequences

3.10.2.1 Construction

3.10.2.1.3 Construction and Demolition Debris

Demolition of the buildings would generate construction debris. Prior to demolition, the construction contractor would submit (via the City of Gainesville ePLan website portal) and obtain a demolition permit from the City of Gainesville per *Florida Building Code, Chap. 1, Sec. 105: Permits*. The construction contractor would be required to recycle or reuse construction debris to the maximum extent practicable. Only materials that could not be reused or recycled would be transported off-site for disposal at a landfill approved for construction debris. VA's plan is consistent with USEPA Region 4's response to VA's request for early input on the Proposed Action which recommended recycling or reusing non-hazardous construction debris (Appendix A).

3.10.2.1.4 Regulated Building Materials

Prior to demolition of the building materials containing ACM, the construction contractor would submit a Notification of Demolition or Asbestos Renovation through the FLDEP Division of Air Resource Management's Online Asbestos Notification System. The construction contractor would then use FL-licensed workers to abate ACM and transport it off-site for proper disposal.

The construction contractor would follow specific requirements for handling lead-based paint during demolition that have been established in USEPA's Lead Renovation, Repair, and Painting Rule and Florida's Lead Poisoning Prevention Program. Prior to disposal of demolition debris containing LCP, the construction contractor would conduct Toxicity Characteristic Leaching Procedure (TCLP) testing (for lead) of those materials to determine the appropriate handling and disposal methods. If the TCLP test results indicate that the lead levels are above regulatory limits, the contractor would follow lead-safe work practices and may be required to remove the paint prior to demolition. Alternatively, the contractor may take a pre-demolition sample of the building material containing LCP for TCLP analysis to determine the appropriate handling and disposal methods.

Any previously unsampled suspect ACM, LCP, or PCBs discovered in the demolition process prior to or during construction would be tested or abated. Sampling of these materials may not be necessary if, in the case of suspect ACM, the materials are assumed to be ACM or if they are determined by a licensed asbestos inspector to be homogenous to other materials that were sampled.

VA's plan is consistent with USEPA Region 4's response to VA's request for early input on the Proposed Action which recommended proper management and disposal of hazardous materials (Appendix A).

With these procedures in place, the construction phase of the Proposed Action would have a direct, long term, less-than-significant beneficial impact on RBMs by removing these materials from the MRVAMC and a direct, short-term, less-than-significant adverse impact by increasing the volume of waste disposed of at an off-site landfill.

3.10.2.1.5 Radiological Waste

The Proposed Action involves removal of the existing radiological storage outbuilding (Building 27) and replacing it with a new structure. Prior to demolishing this outbuilding, all radiological

waste would be removed according to the MRVAMC's existing radiological waste management program. If warranted, the existing emptied outbuilding would be surveyed for radiological isotopes to ensure the demolition debris is properly managed and disposed of.

3.10.2.2 Operation

3.10.2.2.6 Solid Waste and Hazardous Materials

During operation of the Proposed Action, the MRVAMC would continue to manage any operational-related solid waste and hazardous materials in accordance with VA's Standard Operating Procedures (SOPs) and applicable federal and state laws governing the use, generation, storage, or transportation and disposal of these materials. Radiological waste would be stored in a new, onsite, designated building as part of routine MRVAMC operational activities.

Therefore, operation of the Proposed Action would have a direct, long-term, negligible adverse impact on solid waste and hazardous materials associated with normal medical operations.

3.10.2.3 No Action

Under the No Action Alternative, no changes to the existing solid waste and hazardous materials conditions at the MRVAMC would occur. Regular maintenance activities would continue. Therefore, the No Action Alternative would have no mechanism to impact on solid waste and hazardous materials conditions.

3.11 Traffic and Parking

3.11.1 Existing Conditions

3.11.1.1 Regional Transportation

The Gainesville Regional Transit System provides access along SW Archer Road, SW 16th Street, and SW 16th Avenue. It indicates that there are approximately 30 bus stops on the portions of these roads that are adjacent to the MRVAMC.

3.11.1.2 Traffic

In March 2022, VA contracted The Traffic Group, Inc. (TTG) to perform a Traffic Impact Analysis and Parking Baseline study in order to project potential traffic impacts as a result of implementing the Proposed Action (TTG, 2022). This included reviewing existing data showing that that the Annual Average Daily Traffic (AADT) decreased between 2016 and 2020 on selected public roadways adjacent to the MRVAMC. The existing intersections and entrances to the MRVAMC were found to be sufficient for current and future projected traffic levels.

3.11.1.3 Parking

TTG's report included an analysis of a MRVAMC parking study conducted from July 12 to July 16, 2020 (Monday through Friday) (TTG, 2022). A professional "rule of thumb" used by planners is that the occupancy at which optimum efficiency is reached is approximately 90% of actual capacity. The results indicated that several parking areas exceed the 90% average weekday occupancy, and several other areas are close to 90% occupancy. The limited availability of parking spaces increases time spent searching for a space. This can lead to congestion, increase in emissions, and traffic safety concerns. The parking study also indicated that there are 248 available off-site parking spaces, but utilization of those spaces was minimal (averaging 8%).

3.11.2 Environmental Consequences

3.11.2.1 Construction

3.11.2.1.7 Traffic

The existing network of federal highways, state roads, and local roads is sufficient for construction equipment and materials to be transported to the MRVAMC during the construction phase of the Proposed Action. Therefore, no modifications to transportation infrastructure or traffic patterns to these roads would be required and construction would have no impact on regional transportation.

The number of construction workers traveling to and from the MRVAMC during the Proposed Action construction phase is anticipated to be fewer than 100 at any given time. Should each worker drive one vehicle, the additional volume would add an insignificant increase (<20%) in overall traffic volume on roadways outside of the MRVAMC. VA's NEPA regulations at 38 CFR 26(26.62)(ii) define a 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." Such impacts would typically require an Environmental Impact Statement.

When traveling on these roadways, construction workers would be required to follow all existing posted traffic requirements, as all non-emergency vehicles must. The existing roadways within the MRVAMC also provide sufficient access to the Proposed Action site.

To ensure that construction vehicles do not degrade the quality of the roadways within the MRVAMC, gravel construction pads would be installed at the construction site exit to ensure loose debris is physically removed from construction equipment before that equipment travels on MRVAMC roadways; brushes and/or water may also be used to remove debris. Flaggers may be used to alert other drivers when oversized vehicles are entering, exiting, or traveling through the MRVAMC.

Construction would temporarily disrupt pedestrian and vehicle circulation patterns during demolition of selected buildings, parking lots (Patriots, Valor, Dignity, Honor, and Heritage), and current loop road; when heavy equipment and building materials are delivered to the construction site; and during the construction phase for the HSA, parking garage, and new loop road.

Therefore, construction of the Proposed Action would have a direct, short-term, minor adverse impact on traffic conditions.

3.11.2.1.8 Parking

The Proposed Action includes a new 500-car parking garage to support the new HSA. However, this new garage may not be operational before most or all of the selected surface parking lots (Patriots, Valor, Dignity, Honor, and Heritage) are demolished.

To offset this loss of surface parking during construction, the MRVAMC would provide a combination of alternate on-site parking and temporary off-site parking. On-site parking would be available through the Liberty and Independence Garage Expansion Projects, both of which are being completed independent of the Proposed Action. Temporary off-site parking would be available at the Winn-Dixie at 300 SW 16th Avenue (0.75 miles away) and the Days Inn located at 1901 SW 13th Street (0.3 miles away), with shuttle service provided by VA.

Therefore, construction of the Proposed Action would have a direct, short-term, minor adverse impact on parking.

3.11.2.2 Operation

3.11.2.2.9 Traffic

The 2022 traffic study calculated ADT projections for the No Action Alternative and for the Proposed Action.

Incorporated into these projections was the decreasing trend in AADT between 2016 and 2020 (see Section 3.11.1.2). It is typically not reasonable to make traffic increase projections when there is a decreasing trend. However, to estimate a worst-case condition, the study assumed the trend could stop in 2021 and AADT would increase by 1% per year over the period 2021 to 2030.

The study found that while there may be a change in AADT during this period, it would not be due to the Proposed Action. As stated in Section 2.2.5, the current medical and support staffing levels are anticipated to be maintained after the new HSA is in operation so daily traffic to and from the MRVAMC is not projected to increase.

Table 9 presents the findings using Level of Service (LOS) ratings provided by the U.S. Transportation Research Board (TRB, 2000). The only projected change would be in the middle of Archer Road caused by a potential increase in AADT not related to the Proposed Action.

Therefore, operation of the Proposed Action would have no impact on transportation nor traffic conditions on the roadways within or surrounding the MRVAMC.

Table 9. Existing and Projected Level of Service (LOS) for Roadways Adjacent to the MRVAMC

Adjacent Roadways	2020 LOS - Existing	2030 LOS – No Action	2030 LOS – Proposed Action
Southwest End of Archer Rd	C	C	C
Middle of Archer Road	B	C	C
East End of Archer Road	B	B	B
Southwest 16th Avenue	B	B	B

LOS Ratings Defined	
Rating	Description of Traffic Conditions
A	Traffic flows freely, with little or no restrictions to vehicle maneuvers within the traffic stream.
B	Reasonably free-flowing conditions, with slight restrictions to vehicle maneuvers within the traffic stream.
C	Traffic speed approaches free-flowing conditions, but freedom to maneuver within the traffic stream noticeably restricted.
D	Traffic speed begins to reduce, and freedom to maneuver is seriously limited due to a high concentration of traffic.
E	Unpredictable traffic flow, with virtually no usable gaps in the traffic stream to accommodate vehicle maneuvers.
F	Unstable traffic flow resulting in delays and the formation of queues in locations where traffic demand exceeds roadway capacity.
Source: (TRB, 2000)	

3.11.2.2.10 Parking

The Proposed Action includes construction of a new 500-car parking garage restricted to MRVAMC visitor use to compensate for lost surface parking due to the placement of the new HSA. The new garage would be sufficient to accommodate the current demand, which is expected to remain the same when the HSA is operational. The garage will reduce patient walking distances to critical services and the design would locate the parking garage close to the Pharmacy to provide more convenient access for Veterans picking up prescriptions.

Therefore, the Proposed Action would have a direct, long-term, moderate beneficial impact on parking within the MRVAMC.

3.11.2.3 No Action

Under the No Action Alternative, no changes to the existing transportation and traffic conditions at the MRVAMC would occur. The current MRVAMC loop road would remain unchanged and continue to present safety issues to visitors and staff who must cross the loop road when existing or entering the ACA's western entrance. Therefore, the No Action Alternative would have result in a direct, long-term, less-than-significant adverse impact on pedestrian safety within the MRVAMC.

For the No Action Alternative, VA conducted a study projecting future parking demand and determined that the MRVAMC would require over 3,320 total parking spaces by 2042; currently, only 2,300 spaces exist. This projected deficit in parking spaces would continue with or without the Proposed Action. Additionally, when considering that 90% occupancy is considered "fully occupied," the MRVAMC should plan for a total demand of at least 3,600 parking spaces. (The parking garage planned as part of the Proposed Action would not significantly impact the projected deficit as it primarily replaces surface parking lots removed in order to build the new HSA.)

Under the No Action Alternative, VA could address this projected parking deficiency by constructing new parking facilities under a project(s) that are separate from the Proposed Action. VA would complete an environmental analysis prior to designing and constructing any new major parking facilities to serve the MRVAMC.

Under the No Action Alternative, no short-term changes to the existing parking conditions at the MRVAMC would occur. The projected deficit in parking spaces would continue with or without the Proposed Action. The parking garage planned as part of the Proposed Action would not significantly impact the projected deficit as it primarily replaces surface parking lots removed in order to build the new HSA.

Therefore, the No Action Alternative would have no mechanism to impact parking, though the MRVAMC would continue to experience parking deficiencies over time.

3.12 Utilities

3.12.1 Existing Conditions

The City of Gainesville, under the Gainesville Regional Utilities (GRU) provides many of the utilities for the MRVAMC campus, including, water (potable and reclaimed), sanitary sewer, stormwater (off-site), natural gas, telecommunications fiber (cable), and electric. The MRVAMC distributes these utilities to buildings and facilities throughout the MRVAMC via VA-owned infrastructure (Figure 13). Additionally, the MRVAMC CUP generates and distributes steam, hot water, and chilled water to buildings throughout the campus. Medical-grade oxygen and fuel for emergency generators are stored in designated tanks on the MRVAMC property.

Table 10 summarizes available information about the current state of utility capacity, demand, and condition at MRVAMC (VA, 2022d). The table also identifies upgrades to the utility distribution infrastructure identified by MRVAMC as necessary to support current MRVAMC operations and to meet VA PSRDM redundancy requirements, even if the Proposed Action is not implemented.

Figure 13. MRVAMC Existing Utility Diagram

Table 10. MRVAMC Existing Utility Capabilities and Conditions

Utility:	**Electricity**	**Sanitary Sewer**	**Potable Water**	**Natural Gas**	**Steam**	**Chilled Water/AC**	**Hot Water System**	**Medical Gas System**	**Fuel Storage**	**Telecom**
Provider:	GRU	GRU	GRU	GRU	MRVAMC	MRVAMC	MRVAMC	External vendor (not specified)	External vendor (not specified)	AT&T and CenturyLink
Existing Capacity:	Two 12.47kV feeders north of the MRVAMC property line. Numerous standby power generators are present throughout the campus.	MRVAMC sanitary sewer connection to GRU is an 8-inch diameter vitrified clay pipe near SW 16th Street.	Two entry sources from SW 16th Avenue and Archer Road, each feeding 12-inch diameter mains. Operating pressure is at 85 psi from GRU. MRVAMC has a 750,000 gallon-water storage tank to support 96 hours of emergency operations.	N/A	Three boilers, each with output capacity of 20,000 lbs/hr. Steam distributed at 90 psi.	Two plants: one 1,920-ton and one 2,400 ton. Both in fair condition. Two 1,000-ton redundant chillers and several smaller air-cooled units throughout campus.	MRVAMC generates and distributes hot water from the CUP (steam to hot water exchangers). There are five heat exchangers, each providing 120 gpm, 12,000 mbh.	9,000 gallons at 50 psi to the buildings	Underground: One 40K gallon; two 30K gallon; two 50K gallon; one 2.5K gallon Above ground: One 8K gallon; one 6K gallon	N/A

Utility:	**Electricity**	**Sanitary Sewer**	**Potable Water**	**Natural Gas**	**Steam**	**Chilled Water/AC**	**Hot Water System**	**Medical Gas System**	**Fuel Storage**	**Telecom**
Existing Demand	9.0M Kilowatt hours (KWh; average for 2017-2021)	N/A	14.7M gallons (average for 2017-2021)	30.6M MMBtu	Estimated daily load is 8,000 to 10,000 lbs/hr, up to 20,000 lbs/hr during the winter.	The connected load is 5,448 tons. Plant capacity is 4320-tons.	N/A	686,000 cubic feet per month	N/A	N/A
Upgrades recommended to support current MRVAMC operations	No major deficiencies identified, but upgrades needed to meet VA PSRDM requirements.	No major upgrades identified.	No major upgrades identified.	No major upgrades identified.	No major upgrades identified.	The chiller plants do not provide sufficient capacity for the current facility needs. The connected load is 5448 tons. Plant capacity is 4320-tons.	No major upgrades identified.	No major upgrades identified.	No major upgrades identified.	No major upgrades identified.

3.12.1.1 Construction

Based on the conceptual design, the Proposed Action is generally anticipated to have a larger demand for utilities compared with the ACA, because the HSA would have a larger BGSF than the ACA. VA's conceptual anticipated demand for selected utilities is provided in Table 11 (VA, 2022d), though the final projected demand would be determined during development of the final design. Additionally, several of the existing underground utility corridors, which are situated beneath the parking lot where the new HSA would be situated, would need to be rerouted prior to demolition of the overlying parking lots and before the HSA can be constructed; the specific realignment would be determined as part of the final design.

Table 11. Proposed Action Anticipated Utility Demand

Utility	Stormwater	Sanitary Sewerage	Steam	Chilled Water/AC	Fuel Storage
Anticipated Demand from the Proposed Action(1)	New on-site underground detention basin anticipated	New storage system to accommodate 96 hours' worth of sewage	22,200 lbs/hour	1,800 tons with 4,400 gpm	New supply to power generators for 96 hours of operation

1 – Anticipated demand (load) was not available for electricity, stormwater, sanitary sewer, potable water, natural gas, hot water, medical gas, and telecommunications. The A/E of Record would confirm all loads during the design effort, because loads may vary based on system equipment selected, and/or changes in VA standards, and/or changes in design scope, and/or accommodation for future loads.

As part of the final design development process, the A/E would confirm the future utility demands for the Proposed Action, then coordinate with each external utility provider to assess whether there is sufficient supply to meet this demand without impacting service quality to other external customers. Additionally, the A/E would also coordinate with the MRVAMC Chief of Facilities to ensure that any utility upgrades that are planned to correct existing utility deficiencies and to meet VA PSRDM requirements would consequently support the Proposed Action. The A/E and the MRVAMC Chief of Facilities would identify the specific utility corridors and lines that would require re-configuration and develop a utility construction phasing plan to ensure that delivery of utility services throughout the MRVAMC would not be disrupted during the Proposed Action construction process. Re-configuration would involve upfront site work to maintain uninterrupted utility services to all other buildings, creation of redundant utility connections, and creation of new utility corridors. To the extent practicable, any new utility corridors would be constructed within existing areas of disturbance on the MRVAMC property. Should mitigation be required to avoid a significant adverse impact on utility service quality at the MRVAMC or off-campus GRU utility customers, the A/E would design the mitigation strategy and provide a monitoring and maintenance plan to ensure the mitigation remains effective over time.

Once the design of the Proposed Action is finalized, the proposed utility upgrades and re-configurations would be constructed. Construction would involve creating new and redundant connections to the MRVAMC CUP and new utility tunnels to service the HSA. Redundant loops would be required because the HSA would be classified as Mission Critical. Temporary utility lines may be needed to ensure continuity of utility services throughout the MRVAMC while other permanent new utility lines are constructed. The new utility lines installed during construction would present an improvement compared with the prior existing conditions. Additionally, the HSA would meet LEED Silver energy efficient design principles to reduce the demand for utilities.

The pre-design and design coordination among the A/E, MRVAMC Chief of Facilities, and external utility providers, as well as the construction management measures implemented by the A/E, would ensure that Proposed Action does not adversely impact the existing the quality of utility services elsewhere at MRVAMC during the Proposed Action construction phase.

As a result, the Proposed Action would be anticipated to have a direct, short-term, negligible adverse impact on utility services at the MRVAMC, and no impact on GRU utility customers outside of the MRVAMC.

3.12.1.2 Operation

The Proposed Action would utilize all of the utilities identified in Table 10, with anticipated demand for selected utilities identified in Table 11. The utility demand would be minimized by utilizing energy efficient equipment and designing and operating the HSA to meet LEED Silver certification.

Therefore, operation of the Proposed Action, is anticipated to have a direct, long-term, negligible adverse impact on utilities due to the increased consumption of utilities, but no impact on utility service quality within MRVAMC or to GRU customers outside of the MRVAMC.

3.12.1.3 No Action

Under the No Action Alternative, the condition of utilities at the MRVAMC would remain unchanged until any planned upgrades identified by MRVAMC are made as necessary to support current MRVAMC operations and to meet VA PSRDM redundancy requirements. These improvements are not dependent on VA implementing the Proposed Action.

Therefore, the No Action Alternative would have a no impact on utility infrastructure until planned upgrades are designed, constructed, and operated.

3.13 Community Services

Community services include security (police, fire), medical (hospital and ambulatory), educational (public and private schools), and recreational areas (parks, playgrounds) to the community.

With the exception of hospital medical services, the Proposed Action would not increase, reduce, or otherwise impact the level of community services (police, fire, ambulance, schools, public institutions). Therefore, this section analyzes how the Proposed Action would impact medical services provided to Veterans in North Florida and South Georgia.

3.13.1 Existing Conditions

As previously stated, the existing ACA surgical services facilities are functionally deficient due to being undersized. As a result, the current MRVAMC ACA does not provide the amount of space specified in the VA Standards nor national design guide standards.

3.13.2 Environmental Consequences

3.13.2.1 Construction

Construction of the Proposed Action would require demolition of the ACA, which provide space for medical and supportive administrative functions. Prior to demolition of the ACA, planned displaced functions would be accommodated with temporary modular swing space for the length of the construction phase, potentially in combination with added and extended telework plans and some staff relocations. Patients familiar with the layout of the ACA would receive in advance

directions to locate temporary swing space facilities. MRVAMC would also be available to help patients and visitors locate services in swing space facilities. The A/E would coordinate the relocation phasing with the MRVAMC Director to ensure that these temporary swing space facilities minimize disruptions to the delivery of medical and supportive administrative services at the MRVAMC.

Therefore, construction of Proposed Action would have a direct, short-term, minor adverse impact on the delivery of medical and administrative support services.

3.13.2.2 Operation

Operation of the Proposed Action would correct existing space constraint deficiencies in surgical services. The new HSA would also create an efficient configuration and improve communications. The additional space (new and renovated) would correct significant issues in the existing key departments of Surgery, Pharmacy Services (inpatient and outpatient), ED, SPS, SICU, OIT, Logistics, Health Administration Services, Prosthetics, Sensory Aid Services, Pathology, and Laboratory Medicine.

The concurrent addition of a new parking garage would increase capacity and reduce patient walking distances to critical services.

The Proposed Action would bring the MRVAMC into compliance with current facility codes and standard of care practices and provide modern medical services to Veterans in North Florida and South Georgia. Therefore, operation of the Proposed Action would have a direct, long-term, significant beneficial impact on Veteran's medical services.

3.13.2.3 No Action

Under the No Action Alternative, the Proposed Action would not be implemented. The current ACA would not meet national design guide standards or VA Standards for space and patient populations. Existing medical functions would continue, but the purpose and need for action would not be met.

Therefore, the No Action Alternative would have a direct, long-term, significant adverse impact on Veterans' medical services.

3.14 Socioeconomics/Demographics

3.14.1 Existing Conditions

The MRVAMC is located in Gainesville, the county seat of Alachua County, Florida, and the largest city in North Central Florida, with a population of 140,406 in 2021. It is the principal city of the Gainesville metropolitan area, which had a population of 344,881 in 2021 (USCB, 2021b). Gainesville is home to UF, the fourth-largest public university campus by enrollment in the US as of the 2021–2022 academic year. The main campus surrounds and is directly adjacent to the MRVAMC campus.

The socioeconomic conditions are influenced by the employment opportunities in the region, which are predominantly associated with educational services, health care, social assistance, and retail trade (Data USA, 2020). The median household income in Gainesville is $40,822, which is significantly less than the median incomes of $56,445 for Alachua County, $63,062 for Florida, and $69,717 for the United States (USCB, 2021b).

The population in Alachua County increased by 5% between 2020 and 2021 to approximately 279,238 individuals (the year the most recent data was reported) (USCB, 2021b).

The percentage of the population living below the poverty line in Gainesville is significantly higher than in Alachua County overall (40% higher) and in the US (144% higher). Relevant demographic data for Gainesville, Alachua County, and Florida are presented in Table 12 and economic data are presented in Table 13. The data presented are from the U.S. Census Bureau Census Reporter dataset 2021 (USCB, 2021b).

Table 12. Demographic Data for Gainesville, Alachua County, and Florida

Location	Total Population	Median Age	% Under Age 18	% Minority Population (1)	% High School Graduates	% Veterans
Gainesville	140,398	27.7	14.0%	45%	94%	4.6%
Alachua County	279,238	32.8	18.2%	41%	93.7%	7%
Florida	21,828,069	42.8	19.7%	49%	89.8%	7.8%
(1) Data includes all race/ethnicity categories except non-Hispanic White persons.						

Table 13. Economic Data for Gainesville, Alachua County, and Florida

Location	Number of Households	% Population Below the Poverty Line	% Unemployed (1)
Gainesville	56,513	26.9%	2.3%
Alachua County	108,189	19.2%	2.3%
Florida	8,565,329	13.1%	3.3%
(1) Data based on population age 16 and over in civilian labor force.			

3.14.2 Environmental Consequences

3.14.2.1 Construction

The Proposed Action would require the construction contractor to employ skilled laborers and make expenditures on construction equipment, vehicles, supplies, and support facilities (e.g., office trailers, safety equipment, erosion-control materials). Workers from outside of Alachua County who are involved with construction of the Proposed Action may utilize area lodging and other amenities. The temporary increase in the number of workers supporting construction of the Proposed Action would not induce changes in the demographic profile of Gainesville or Alachua County as it relates to population, housing, or income levels.

During the design phase, VA may determine that new staff would need to be hired to support the new facility. Although the specific operating budget and staffing levels would be defined during the design phase, routine operating expenditures would generally benefit Gainesville through additional tax revenue. However, Gainesville had a total gross domestic product of approximately $18 billion in 2022 (FRED, 2022).

Therefore, the temporary increase in employment and spending on equipment, supplies, and local services would have a direct, short-term, negligible beneficial impact on local socioeconomic conditions in Gainesville and Alachua County.

3.14.2.2 Operation

Operation of the Proposed Action would enable Veterans in North Florida and South Georgia to continue receiving medical care at the MRVAMC, avoiding the related expenses of traveling outside of this region to obtain medical care at another VA medical center or at a non-VA medical provider.

Once construction is complete, the Proposed Action would require capital expenditures to operate and maintain the new infrastructure, including the purchase of maintenance, technological, and medical equipment.

Therefore, operation of the Proposed Action would have a direct and indirect, long-term, negligible beneficial impact on socioeconomic conditions in Gainesville and Alachua County.

3.14.2.3 No Action

Under the No Action Alternative, the Proposed Action would not be implemented. There would be no increase in expenditures on local or regional services and materials. Baseline expenditures on local services and materials would continue for the foreseeable future. Therefore, the No Action Alternative would have no impact on socioeconomics and demographics.

3.15 Environmental Justice

Environmental Justice (EJ) was established at the federal level as a priority under Executive Order (EO) 12898 "Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations," issued in 1994. EO 12898 directs each federal agency to make achieving EJ part of their mission by identifying and addressing disproportionately high and adverse human health or environmental effects of the agencies' programs, policies, and activities on minority and low-income populations. Under the EO, federal agencies are required to develop an EJ Strategy in addition to reporting on their compliance with the EO. VA issued its formal Environmental Justice Strategy (VA, 2012) in February 2012.

VA has embraced and practices the principles of environmental justice through the assurance of fair and equitable care of our Nation's Veterans and compliance with environmental and non-discrimination laws. VA's strategy complies with the EJ requirements under NEPA, 42 U.S.C. Section 4321 et seq. and through compliance with Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. Section 2000d *et seq*.

3.15.1 Existing Conditions

To help achieve USEPA's goal for EJ (i.e., the fair treatment and meaningful involvement of all people), VA analyzes proposed actions considering the public health of and environmental conditions affecting minority, low-income, and indigenous populations in recognition of the fact that these populations frequently bear a disproportionate burden of environmental harms and risks.

In order to determine if the impacts of the Proposed Action may disproportionately impact vulnerable communities as defined by USEPA, VA utilized the same minority and poverty data presented in Table 12 and Table 13 along with data specific to a 1-mile radius around the MRVAMC to determine whether the minority and/or low-income populations surrounding the MRVAMC are significantly higher than in the City of Gainesville and Alachua County.

Forty percent (40%) of the population in a 1-mile radius surrounding the MRVAMC are minorities. This represents the percent of individuals who list their racial status in the Census as a race other

than white alone and/or list their ethnicity as Hispanic or Latino. The word "alone" in this case indicates that the person is of a single race, not multiracial. Seventy-one percent (71%) of individuals in a 1-mile radius are members of households whose household income is less than or equal to the federal poverty level (USEPA, 2022b).

As stipulated in *EO 13045: Protection of Children from Environmental Health Risks and Safety Risks*, federal agencies (a) shall make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children; and (b) shall ensure that their policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks (USEPA, 1997). Seven percent (7%) of individuals in a 0.7-mile radius around the MRVAMC are under the age of 18 (USCB, 2021). This is significantly less than the proportion under 18 in the City of Gainesville (15%) and in the United States (22%).

3.15.2 Environmental Consequences

3.15.2.1 Construction

Construction of the Proposed Action would have no or negligible adverse impacts on most of the resources analyzed in this EA. While it would have direct, short-term, less-than-significant adverse impacts on air quality and on noise-sensitive receptors at the MRVAMC (but not in the surrounding community), and direct, short-term, minor adverse impacts on administrative and medical support services at the MRVAMC, none of these would rise to a significant adverse level.

The construction contractor would establish a safe work zone around the perimeter of the western portion of the MRVAMC with signage and fencing to ensure only authorized personnel can enter the work zone. These measures would help to ensure that the Proposed Action does not pose a disproportionate environmental health and safety risk to children.

Therefore, construction of the Proposed Action overall would not significantly nor disproportionately impact vulnerable populations.

However, the temporary increase in employment and spending on equipment, supplies, and local services would have a direct, short-term, minor beneficial impact on local socioeconomic conditions that could positively impact vulnerable populations.

3.15.2.2 Operation

Operation of the Proposed Action would have no significant adverse impacts on the resources analyzed in this EA. However, it would have a direct, long-term, significant beneficial impact on community services by bringing the MRVAMC into compliance with current facility codes and standard of care practices and providing modern medical services to Veterans in North Florida and South Georgia.

Considering that approximately 25% of Veterans are minorities (USA Facts, 2019) and, in Florida, 106,000 Veterans live below federal poverty levels (USCB, 2021c), the significant beneficial impact on community services would likely positively impact one or more vulnerable populations.

3.15.2.3 No Action

The No Action Alternative would have no mechanism to impact environmental justice conditions.

3.16 Cumulative Impacts

As defined by CEQ regulations in 40 CFR Part 1508.7, cumulative impacts are those which "result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (federal or non-federal) or individual who undertakes such other actions."

Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions taken before, during, or after the Proposed Action in the same geographic area.

The Proposed Action site is an approximately 10-acre area located on the western portion of the MRVAMC. The site is highly developed and devoid of wildlife habitat or significant natural features (e.g. wetlands or water bodies). It has been extensively graded, and the subsurface environment consists of densely compacted urban fill interspersed with numerous utility corridors and duct banks.

The surrounding MRVAMC grounds are also highly developed with medical and infrastructure support buildings, roadways, parking areas, designated entrances, utility infrastructure, and landscaped grounds. The MRVAMC is located in the south-western portion of the City of Gainesville, which is highly urbanized and includes primarily a mixture of university and medical facilities. The continued use of the MRVAMC property as a medical hospital is also consistent with the *Gainesville 2040 Comprehensive Plan* (City of Gainesville, 2022). No new development plans were identified for off-campus properties. Given the fully developed nature of the surrounding area, there is little remaining space for in-fill development.

Other projects currently underway or planned for the MRVAMC campus in the near future include repairs and renovations to Building 1, the replacement of boilers and oxygen tank structures, expansion of the Liberty parking garage, and the construction of an administration building and information technology wing.

3.16.1 Proposed Action

Constructing and operating the Proposed Action would result in no significant adverse impacts to the resources analyzed in this EA.

Cumulative impacts on the resources are mostly likely to occur through additional development at the MRVAMC. Additional development could increase impervious surface area and/or impact the existing stormwater management infrastructure, such that new and/or replacement infrastructure is required to achieve stormwater quality requirements. Major projects that involve new or expanded medical or administrative functions, such as the new sterile processing facility, could increase the demand for utilities. This demand, when considered on a cumulative basis with other future expansions, could be considered to have a less-than-significant adverse impact due to the possibility that the resources from which the utilities are obtained are not renewable. Based on VA's experience constructing and operating similar projects, potential adverse impacts from these future projects are anticipated to remain less-than-significant because of increases in the efficiencies in future building systems.

As VA continues to identify improvements and advancements in standards of delivering care, future renovations to or demolition of existing facilities may be required. These would be analyzed separately.

As previously described, the Proposed Action would have a direct, long-term, significant beneficial impact on community services, and a direct, short-term, minor beneficial impact on local socioeconomic conditions.

3.16.2 No Action

The No Action Alternative would have a direct, long-term, significant adverse impact on community services by not correcting non-compliant surgical, emergency, pharmacy, and sterile processing at the MRVAMC and failing to provide the standard of care to Veterans in North Florida and South Georgia required to meet current and future VA strategic goals and standard of care practices.

3.17 Potential for Generating Substantial Public Controversy

3.17.1 Proposed Action

The Proposed Action is not anticipated to generate substantial controversy or lead to negative public reaction because it would bring the MRVAMC services into compliance with current facility codes and standard of care practices.

3.17.2 No Action

Significant public controversy would be anticipated under the No Action Alternative due to the public's awareness that the MRVAMC services are not in compliance with current facility codes and standard of care practices nor providing the highest quality of care to Veterans in North Florida and South Georgia.

4. IMPACT MANAGEMENT AND MINIMIZATION MEASURES

This section summarizes the impact management and minimization measures that are proposed to minimize and maintain potential adverse impacts of the Proposed Action at acceptable, less-than-significant levels (Table 14).

Per established protocols, procedures, and requirements, the A/E and construction contractor(s) would incorporate and implement these BMPs and would satisfy all applicable regulatory compliance requirements in associated with the design, construction, and operation of the Proposed Action at the MRVAMC. These measures are consistent with those regularly implemented on VA construction projects. These "management measures" are described in this EA for the Proposed Action. "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.

Table 14. Management and Minimization Measures Incorporated into the Proposed Action

ENVIRONMENTAL RESOURCE TOPIC	
Aesthetics	**Type of Measure**
Construction	
Implement dust suppression methods identified in VA Specification 01 57 19: Temporary Environmental Controls. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of dust-generating activities during sustained high wind conditions (10-40 mph with gusts at or above 50 mph).	BMP
Install gravel pads at the construction site exit to prevent tracking loose soil onto roadways.	BMP
Designate a central staging area for equipment and materials that is within the construction site.	BMP
Install construction privacy fencing between the construction area and the existing hospital grounds to reduce visual impacts to visitors and staff.	BMP
Plant native, non-invasive, drought-resistant vegetation following grading to stabilize soils and minimize dust generation.	BMP
Operation	
Professionally maintain the façades of the new HSA and parking garage.	
Professionally maintain newly landscaped areas with native, non-invasive vegetation.	BMP
Air Quality	
Construction	
Use Tier 4-compliant engines to reduce emissions of particulate matter and nitrogen oxides to meet emission standards established by USEPA.	BMP
Limit the idling of mobile sources to three minutes.	BMP
Implement dust suppression methods identified under Aesthetics.	BMP
Operation	
Implement and maintain design processes required to achieve USGBC LEED Silver certification.	BMP

ENVIRONMENTAL RESOURCE TOPIC	
Aesthetics	**Type of Measure**
Based on the final design for the Proposed Action, obtain any required air quality permits necessary to operate the HSA and/or boilers used to support the HSA.	Permit requirements
Cultural and Historic Resources	
The construction contractor would implement an "Inadvertent Discovery" plan to address unanticipated discoveries in the event construction activities encounter previously unknown archaeological properties.	BMP
Geology, Topography, and Soils	
Construction	
Geology - The A/E shall complete a Site-Specific Seismic Hazard Analysis as part of the design process, as required under VA H-18-8 and incorporate seismic design elements and requirements specified therein; VA Master Construction Specification 13 05 41: *Seismic Restraint Requirements for Non-Structural Components*; and the Unified Facilities Criteria (UFC 3-310-04).	BMP, Regulatory requirement
Geology – Avoid blasting bedrock and causing vibrations that could impact medical services in nearby buildings at the MRVAMC.	BMP
Topography – Ensure to the extent practicable that the site of the HSA matches the elevation of the main hospital building finished floor elevations and no internal ramps would be required for the basement and first floors.	BMP
Soils – The A/E would apply for, obtain, and implement the terms of the FLDEP National Pollutant Discharge Elimination System (NPDES) Generic Permit for Stormwater Discharge from Large and Small Construction Activities (CGP). The construction contractor would implement and maintain permit-required BMPs for sedimentation and erosion control, including using silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, synthetic straw bales, rip-rap, and/or similar physical control structures. Retain on-site vegetation to the maximum extent possible. Revegetate disturbed areas with native, non-invasive vegetation as soon as construction is completed. These BMPs would be consistent with VA's Specification 01 57 19: *Temporary Environmental Controls*.	BMP, Regulatory requirement
Soils - Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impacts of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality. Report releases of regulated quantities of petroleum-based fluids to VA and FLDEP. Perform cleanup according to applicable state regulatory requirements.	BMP, Regulatory requirement
Operation	
Professionally maintain soils exposed during construction and revegetated to prevent exposure and subsequent erosion.	BMP
Prevent soil erosion by managing stormwater through engineering controls and improvements to the MRVAMC stormwater management system.	BMP
Hydrology and Water Quality	
Construction	
Conduct periodic observations of initial site preparation activities, including groundwater and surface water runoff control measures, stripping, proof-rolling of the exposed site surface after stripping, observation and testing of engineered fill, subgrade preparation testing of compaction in foundation bearing soils, and other exposed geotechnical conditions.	BMP

ENVIRONMENTAL RESOURCE TOPIC	
Aesthetics	**Type of Measure**
If deeper drainage control structures and utility pipes are required, implement groundwater control measures to facilitate bearing surface preparation and backfilling operations if necessary.	BMP
Assess the need for waterproofing as well as a positive permanent drainage system as part of the design and construction of basement.	BMP
Design the Proposed Action to comply with EISA Section 438 to the maximum extent technically feasible.	Regulatory requirement
A/E would apply for, obtain, and the construction contractor would implement the terms of the Florida Department of Environmental Protection (FLDEP) National Pollutant Discharge Elimination System (NPDES) Generic Permit for Stormwater Discharge from Large and Small Construction Activities (CGP), including BMPs specified in the Stormwater Management Plan (SWPPP) to minimize stormwater volume and velocity, soil erosion, and sedimentation of stormwater runoff from the Proposed Action site. Based on the final design of the Proposed Action, the A/E would also obtain any stormwater permits required by the City of Gainesville and ensure any modifications to the MRVAMC stormwater system comply with the City of Gainesville *Engineering Design & Construction Manual Chapter 4: Stormwater Management*.	Permit-required regulatory compliance
Operation	
Integrate the new stormwater management infrastructure installed for Proposed Action into the overall operational and maintenance program for other MRVAMC stormwater system infrastructure., as well as adhere to any permit-required stormwater quality monitoring programs.	Permit-required regulatory compliance
Noise and Vibration	
Construction	
MRVAMC facilities staff would provide medical and administrative staff with advance information on the schedule for demolition and construction; activities and expected noise levels; and duration of activities.	BMP
Implement VA's noise control requirements and noise management BMPs specified in VA Specification *01-57-19 Temporary Environmental Controls* including but not limited to: ▪ Using shields or other physical barriers to restrict noise transmission. ▪ Providing soundproof housings or enclosures for noise producing machinery. ▪ Using efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified. ▪ Conducting truck loading, unloading, and hauling operations so that noise is kept to a minimum. ▪ Selecting material transportation routes as far away from sensitive receptors as possible. ▪ Shutting down noise-generating heavy equipment when it is not needed (do not allow equipment to idle for more than three minutes).	BMP
Comply with the City of Gainesville noise ordinance (Chapter 15) for commercial land use.	Regulatory requirement
Perform construction activities during daylight hours on weekdays unless there is a specific activity that needs to be completed outside of this schedule to avoid impacting the staff, visitors, and patients at the MRVAMC to the extent practicable. Should such activity be necessary, the MRVAMC Public	BMP

ENVIRONMENTAL RESOURCE TOPIC	
Aesthetics	**Type of Measure**
Information Office would notify sensitive receptors in advance of the work taking place.	
Comply with OSHA requirements to protect hearing of workers around loud construction equipment.	Regulatory requirement
Should pile driving be required, coordinate with MRVAMC Director in advance and implement precautions to reduce impacts on vibration-sensitive receptors.	BMP
Solid Waste and Hazardous Materials	
Construction	
Obtain a demolition permit from the City of Gainesville per *Florida Building Code, Chap. 1, Sec. 105: Permits* and recycle or reuse construction debris to the maximum extent practicable, as required.	Permit-required regulatory compliance
Prior to demolishing the radiological storage outbuilding (Building 27), remove all radiological waste. If warranted, survey the emptied existing building for radiological isotopes to ensure the demolition debris is properly disposed of.	Regulatory requirement
Submit a Notification of Demolition or Asbestos Renovation through the FLDEP Division of Air Resource Management's Online Asbestos Notification System prior to demolishing buildings containing ACM. Employ FL-licensed workers to abate ACM and transport it off-site for proper disposal.	Regulatory requirement
Remove all identified ACM in the areas to be demolished or that are adjacent to those areas to ensure worker safety and to eliminate future ACM-related maintenance and management costs and risks. Test or abate any new materials discovered in the demolition process.	Regulatory requirement
Prior to demolition, conduct TCLP lead testing on existing building materials, painted and unpainted, for lead. If lead is present, appropriately monitor and protect workers against lead exposure.	Regulatory requirement
Sample and test building materials for PCBs. Manage and dispose of PCB waste according to applicable USEPA regulations.	Regulatory requirement
Operation	
Follow VA and MRVAMC SOPs and applicable federal and state laws governing the use, generation, storage, or transportation and disposal of solid waste and hazardous materials.	Regulatory requirement
Store radiological waste in a new, onsite, designated building as part of routine MRVAMC operational activities.	Regulatory requirement
Transportation and Parking	
Construction	
Implement housekeeping measures to keep MRVAMC and surrounding roadways free of debris, as specified for Aesthetics.	BMP
Utilize flaggers when transporting oversized vehicles to and from the construction site and entering and existing the MRVAMC, if warranted.	BMP
Provide a combination of alternate on-site parking and temporary off-site parking to offset loss of surface parking.	BMP
Operation	
Restrict the use of the new 500-space parking garage to MRVAMC visitors.	BMP
Utilities	
Construction	
Design the Proposed Action to meet USGBC LEED Silver certification and VA PSRDM requirements.	BMP

ENVIRONMENTAL RESOURCE TOPIC	
Aesthetics	**Type of Measure**
The A/E would calculate projected utility demand based on the final design of the Proposed Action, then coordinate with each utility provider to assess whether there is sufficient supply to meet this demand.	BMP
Operation	
If it is determined that operational utility use would result in a significant decrease in utility service quality, incorporate into the design a mitigation strategy and provide a monitoring and maintenance plan to ensure the mitigation remains effective over time.	BMP
Community Services	
Construction	
Relocate displaced medical and administrative functions to temporary swing space to avoid disrupting services.	BMP
Provide patients with multiple types of wayfinding support to locate services in temporary swing space locations.	BMP

5. POTENTIALLY APPLICABLE ENVIRONMENTAL PERMITS AND APPROVALS

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 table presents potentially applicable federal, state, and municipal environmental permits and approvals required for the Proposed Action (Table 15). The A/E and construction contractor(s) would be responsible for obtaining and implementing these and any other environmental permits deemed necessary based on the final design for the Proposed Action.

Table 15. Potentially Applicable Environmental Permits and Approvals

Permit, Approval, or Certification	Responsible Agency	Applicable Criteria	Required Actions	Permitting Schedule	Comments
NPDES Construction Generic Permit (CGP) for Large Construction Activity (greater than 5 acres) http://www.dep.state.fl.us/water/stormwater/npdes/	Florida Department of Environmental Protection (FLDEP)	Construction of any facility that disturbs 5 acres or more	File Notice of Intent. Include Stormwater Pollution Prevention Plan (SWPPP)	2 weeks to prepare, 2 days to achieve permit coverage	Submit NOI form via FLDEP Interactive NOI website. Renew coverage every five years.
Coastal Zone Management Program Consistency Determination	The Florida Coastal Management Program	Federal undertakings that may impact coastal zone resources.	Submit Draft EA to Florida State Clearinghouse	30-day review period	FL SCH will distribute to FLCMP for review.
Asbestos Abatement	FLDEP Division of Air Resource Management	Abatement of ACM	Contractor to submit Notification of Demolition or Asbestos Renovation through the FLDEP Division of Air Resource Management's Online Asbestos Notification System	30-day review period	Contractor to submit abatement and monitoring plan.
City of Gainesville Demolition Permit	City of Gainesville	Demolition of buildings	Construction contractor to submit permit	30-day review period	Contractor may be required to submit permit even though work occurs at a federal facility.
ASSUMPTIONS:					
Local permits will not be obtained.					

6. STAKEHOLDER AND 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 38 CFR Part 26, VA's regulations for implementing NEPA. 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. Members of the public with interest in the Proposed Action are encouraged to participate.

6.1 Scoping

During development of the Draft EA, VA published a Notice of Intent (NOI) to prepare a Draft EA in *The Gainesville Sun* on August 5 and 7, 2022, and on the VA website at https://www.cfm.va.gov/environmental. A copy of the NOI is provided in Appendix C. VA provided instructions on how to submit comments to be considered during the NEPA process.

On August 4, 2022, VA also mailed letters to Native American Tribes; federal, state, and local regulatory agencies; and elected officials with potential interest in the Proposed Action inviting them to submit any comments on the scope of issues for analysis or relevant information. Relevant comments received during this 30-day period were incorporated into the Draft EA. A list of stakeholders contacted, and copies of all correspondence are provided in Appendix A.

Comments were only received from USEPA Region 4 who provided recommendations regarding:

- Employing green building practices that provide an opportunity to create environmentally-sound and resource-efficient buildings by using an integrated approach to design
- Managing stormwater
- Mitigating noise impacts
- Recycling/reusing non-hazardous construction debris
- Properly managing and disposing of hazardous materials

A copy of USEPA's response is provided in Appendix A. No other input was received from stakeholders nor the public.

6.2 Draft EA

The Draft EA was published and released for a 30-day review and comment period, as announced by a Notice of Availability (NOA) published in The Gainesville Sun. The NOA was also emailed/mailed to the same Native American Tribes; federal, state, and local regulatory agencies; and elected officials to inform them of the 30-day review and comment period. A copy of the NOA is provided in Appendix C.

As stated in the NOA, the Draft EA was available for review in print at the Alachua County Library District Headquarters Library at 401 East University Avenue, Gainesville, FL 32601 and electronically via download from the VA website at https://www.cfm.va.gov/environmental.

Comments or requests for additional information on the draft EA can be sent via email to VACOEnvironment@va.gov with the subject line "Malcom Randall VAMC HSA Draft EA."

Comments received during the Draft EA 30-day review period will be included and addressed in the Final EA.

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8. LIST OF PREPARERS

US Department of Veterans Affairs	
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Mabbett & Associates, Inc. (Contractor)	
A. Glucksman	Project Manager, Document Preparation, Technical Quality Assurance/Quality Control
D. McClane	Architectural History Research and Affected Environment
D. Martin	Geographic Information System mapping
S. Grabelle	Research and Data Gathering, Document Preparation
R. Blanchette	Civil Engineering, Stormwater Management

9. GLOSSARY

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- NEPA Glossary, U.S. Fish and Wildlife Service, http://www.fws.gov/r9esnepa/Intro/Glossary.PDF

Aesthetic resources: The components of the environment as perceived through the visual sense only. Aesthetic specifically refers to beauty in both form and appearance.

Affected environment: A portion of the NEPA document that succinctly describes the environment of the area(s) to be affected or created by the alternatives under consideration. Includes the environmental and regulatory setting of the proposed action.

Alternative: A reasonable way to fix the identified problem or satisfy the stated need.

Attainment area: An area that the Environmental Protection Agency has designated as being in compliance with one or more of the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and particulate matter. An area may be in attainment for some pollutants but not for others.

Conformity analysis: The *Clean Air Act* requires the Environmental Protection Agency to promulgate rules to ensure that federal actions conform to the appropriate state implementation plans (SIP) for air quality. Two sets of rules (one for transportation and one for all other actions) developed by USEPA establish the criteria and procedures governing the determination of this conformity. A conformity analysis follows these criteria and procedures to quantitatively assess whether a proposed federal action confirms with the SIP.

Council on Environmental Quality (CEQ): Established by Congress within the Executive Office of the President as part of the *National Environmental Policy Act of 1969*, CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives. The Council's Chair, who is appointed by the President with the advice and c consent of the Senate, serves as the principal environmental policy adviser to the President. The CEQ reports annually to the President on the state of the environment, oversees federal agency implementation of the environmental impact assessment process, and acts as a referee when agencies disagree over the adequacy of such assessments.

Criteria pollutant: An air pollutant that is regulated by NAAQS. Criteria pollutants include sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and two size classes of particulate matter, PM10 and PM2.5 New pollutants may be added to, or removed from, the list of criteria pollutants as more information becomes available.

Cumulative effect (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.

Decibel (dB): A unit for expressing the relative intensity of sounds on a logarithmic scale from zero for the average least perceptible sound to about 130 for the average level at which sound causes pain to humans. For traffic and industrial noise measurements, the A-weighted decibel (dBA), a frequency-weighted noise unit, is widely used. The A-weighted decibel scale corresponds approximately to the frequency response of the human ear and thus correlates well with the loudness perceived by people.

Effects: Effects and impacts, as used in NEPA, are synonymous. Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect would be beneficial. There are direct effects and indirect effects. Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Endangered species: Plants or animals that are in danger of extinction through all or a significant portion of their ranges and that have been listed as endangered by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service following the procedures outlined in the *Endangered Species Act (ESA)* and its implementing regulations.

Environmental assessment (EA): A concise public document for which a federal agency is responsible that serves to briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS) or a finding of no significant impact; aid an agency's compliance with NEPA when no environmental impact statement is necessary; or facilitate preparation of an EIS when one is necessary. Includes brief discussions of the need for the proposal, of alternatives, of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.

Environmental impact statement (EIS): A detailed written statement required by Section 102(2)(C) of NEPA, analyzing the environmental impacts of a proposed action, adverse effects of the project that cannot be avoided, alternative courses of action, short-term uses of the environment versus the maintenance and enhancement of long-term productivity, and any irreversible and irretrievable commitment of resources.

Environmental justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Executive Order 12898 directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing disproportionately high and adverse effects of agency programs, policies, and activities on minority and low-income populations.

Finding of no significant impact (FONSI): A public document issued by a federal agency briefly presenting the reasons why an action for which the agency has prepared an environmental

assessment has no potential to have a significant effect on the human environment and, thus, would not require preparation of an environmental impact statement.

Floodplain: The lowland and relatively flat areas adjoining inland and coastal waters including flood- prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year. **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.

Fugitive emissions: Emissions that do not pass through a stack, vent, chimney, or similar opening where they could be captured by a control device. Any air pollutant emitted to the atmosphere other than from a stack. Sources of fugitive emissions include pumps; valves; flanges; seals; area sources such as ponds, lagoons, landfills, and piles of stored material (such as coal); and road construction areas or other areas where earthwork is occurring.

Hazardous material: Any material that poses a threat to human health and/or the environment. Hazardous materials are typically toxic, corrosive, ignitable, explosive, or chemically reactive.

Historic property: Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

Impacts: see Effects.

Impervious surface: A hard surface area that either prevents or retards the entry of water into the soil or causes water to run off the surface in greater quantities or at an increased rate of flow. Common impervious surfaces include, but are not limited to, rooftops, walkways, patios, driveways, parking lots, storage areas, concrete or asphalt paving, and gravel roads.

National Ambient Air Quality Standards (NAAQS): Standards defining the highest allowable levels of certain pollutants in the ambient air (i.e., the outdoor air to which the public has access). Primary standards are established to protect public health; secondary standards are established to protect public welfare (for example, visibility, crops, animals, buildings).

National Pollutant Discharge Elimination System (NPDES): A provision of the *Clean Water Act* that prohibits discharge of pollutants into waters of the United States unless a special permit is issued by the Environmental Protection Agency, a state, or, where delegated, a tribal government on an Indian reservation.

National Register of Historic Places (NRHP): The nation's inventory of known historic properties that have been formally listed by the National Park Service (NPS). The NRHP is administered by the NPS on the behalf of the Secretary of the Interior. National Register listings include districts, landscapes, sites, buildings, structures, and objects that meet the set of criteria found in 36 CFR 60.4.

No action Alternative: The alternative where current conditions and trends are projected into the future without another proposed action.

Particulate matter (PM), PM10, PM2.5: Any finely divided solid or liquid material, other than uncombined (that is, pure) water. A subscript denotes the upper limit of the diameter of particles

included. Thus, PM10 includes only those particles equal to or less than 10 micrometers (0.0004 inch) in diameter; PM2.5 includes only those particles equal to or less than 2.5 micrometers (0.0001 inch) in diameter.

Proposed action: In a NEPA document, this is the primary action being considered. Its impacts are analyzed together with the impacts from alternative ways to achieve the same objective and the required no action alternative, which means continuing with the status quo.

Runoff: The portion of rainfall or irrigation water that flows across ground surface and is eventually returned to streams. Runoff can pick up pollutants from the air or the land and carry them to streams, lakes, and oceans.

Scope: Consists of the range of actions, alternatives, and impacts to be considered in an environmental analysis. The scope of an individual statement may depend on its relationships to other statements (also see tiering).

Scoping: An early and open process for determining the extent and variety of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR §1501.7). The scoping process helps not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the NEPA process accordingly, and for early identification of what are and what are not the real issues (40 CFR §1500.5(d)). The scoping process identifies relevant issues related to a proposed action through the involvement of all potentially interested or affected parties (affected federal, state, and local agencies; recognized Indian tribes; interest groups, and other interested persons) in the environmental analysis and documentation.

Significantly: As used in NEPA, requires considerations of both context and intensity.

Context— significance of an action must be analyzed in its current and proposed short- and long-term effects on the whole of a given resource (for example, affected region).

Intensity—refers to the severity of the effect.

Solid waste: Non-liquid, non-soluble materials ranging from municipal garbage to industrial wastes that contain complex and sometimes hazardous substances. Solid wastes also include sewage sludge, agricultural refuse, demolition wastes, and mining residues. Technically, solid waste also refers to liquids and gases in containers.

Wetlands: Those areas that are inundated by surface water or groundwater with a frequency sufficient to support, and under normal circumstances do, or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas.

Jurisdictional wetlands are those wetlands protected by the *Clean Water Act*. They must have a minimum of one positive wetland indicator from each parameter (vegetation, soil, and hydrology). The U.S. Army Corps of Engineers requires a permit to fill or dredge jurisdictional wetlands.

APPENDICES

APPENDIX A

Agency - Federal	Dear	Position	Address 1	Address 2	City State Zip	Telephone	Email
U.S. Fish and Wildlife Service - North Atlantic-Appalachian Regional Office	Wendi Weber	Regional Director	300 Westgate Center Dr.		Hadley, MA 01035	413-253-8200	Northeast@fws.gov
U.S. Environmental Protection Agency Region 4	Ntale Kajumba	Acting Director, Strategic Programs Office	U.S. EPA Region 4	61 Forsyth Street, S.W	Atlanta, Georgia 3030	404-562-9620	Kajumba.ntale@epa.gov
U.S. Army Corps of Engineers, Jacksonville Regulatory District	Col. James Booth	District Commander	701 San Marco Blvd		Jacksonville, FL 32207	904-232-2568	CESAJ-CC@usace.army.mi
USDA Natural Resource Conservation Service	Terry Cosby	Chief	USDA, NRCS, Office of the Chief	1400 Independence Ave., SW, Room 4081-	Washington, DC 20250	202-690-7246	terry.cosby@usda.gov

Agency - State	Dear	Position	Address 1		City State Zip	Telephone	Email
Florida State Clearinghouse **state.clearinghouse@FloridaDEP.gov** (the clearinghouse will distribute the letter to other state agencies							
Florida Department of Environmental Protection	cc: Victoria Ford	Administrative Assistant	Northeast District	3900 Commonwealth Blvd.	Tallahassee, FL 32399	850-245-3029	Victoria.Ford@FloridaDEP.gov
Florida Department of Transportation	Jared W. Perdue, P.E.	Secretary	605 Suwannee St.		Tallahassee, FL 32399	850-414-4100	state.clearinghouse@FloridaDEP.gov
Florida Local Environmental Resource Agencies (FLERA)	Faye Brainard	Executive Assistant	c/o Florida Association of Counties	100 South Monroe Street	Tallahassee, FL 32301		state.clearinghouse@FloridaDEP.gov
Florida Division of Historical Resources	Timothy Parsons, Ph.D.	SHPO Director	R.A. Gray Building, Room 305	500 S. Bronough	Tallahassee, FL 32399-0250	850-245-6300	state.clearinghouse@FloridaDEP.gov
Florida Coastal Zone Management Program	Scott Eastman	Regional Administrator					Scott.Eastman@dep.state.fl.us
FWC Conservation Planning Services	(see general email column)						FWCConservationPlanningServices@myfwc.com
The St. Johns River Water Management District	Steve Fitzgibbons	Intergovernmental Planner	Palatka Headquarters	P.O. Box 1429	Palatka, FL 32178-1429	386-312-2369	sfitzgibbons@sjrwmd.com

Elected Officials - Federal, State, Local	Dear	Position	Address 1	City State Zip	Telephone	Email
Senator Marco Rubio, United States Senate	Senator Rubio		284 Russell Senate Office Building	Washington, DC 20510	202-224-3041	
Senator Rick Scott. United States Senate	Senator Scott		716 Hart Senate Office Building	Washington. DC 20510-0001	202-224-5274	
Representative Kat Cammack, United States House of Representatives - District 3	Representative Cammack		1626 Longworth House Office Building	Washington, DC 20515-0903	202-225-5744	
Senator Keith Perry, Florida State Senate - District 8	Senator Perry		2610 NW 43rd Street	Suite 2B Gainesville, FL 32606	352-264-4040	
Charles Wesley "Chuck" Clemons, Sr., Florida House of Representatives - District 21	Representative Clemons		322 The Capitol	402 South Monroe Street Tallahassee, FL 32399-1300	850-717-5021	

Agency - County	Dear	Position	Address 1	Address 2	City State Zip	Telephone	Email
Alachua County Environmental Protection Department	Stephen Hofstetter	Environmental Protection Director	408 W. University Ave.	Suite 106	Gainesville, FL 32601	352-264-6800	SHofstetter@alachuacounty.us
Alachua County Growth Management Department	Missy Daniels	Growth Management Director	10 SW 2nd Ave		Gainesville, FL 32601	352-374-5243	mdaniels@alachuacounty.us
Alachua Conservation Trust (ACT)	Tom Kay	Executive Director	Prairie Creek Lodge	7204 SE CR 234	GAINESVILLE, FL 32641	352-373-1078	info@alachuaconservationtrust.org
Alachua County Housing Authority	Ron Hall	Operations Director	703 NE 1st Street		Gainesville, FL 32601	352-372-2549	ron@acha-fl.com <ron@acha-fl.com>;
Alachua County Veteran Services Division	Kim Davis	Veteran Services Director	John Henry Thomas, M.D. Center	218 SE 24th Street	Gainesville, FL 32641	352-264-6740	kdavis@alachuacounty.us

Agency - City	Dear	Position	Address 1	Address 2	City State Zip	Telephone	Email
Gainesville City Manager's Office	Cynthia W. Curry	City Manager	P. O. Box 2496		Gainesville, GA 30503		citymgr@gainesvillefl.gov
Gainesville Economic Development			P.O. Box 2496		Gainesville, GA 30503	770-531-6570	bredfeldea@gainesvillefl.gov
Gainesville Public Works Department	Chris Rotalsky	Public Works Director	P.O. Box 2496		Gainesville, GA 30503	770-535-6882	pubwrk@gainesvillefl.gov

Agency - Tribe	Dear	Position	Address 1	Address 2	City State Zip	Telephone	Email
Miccosukee Tribe of Indians of Florida	Talbert Cypress	Chairperson	Tamiami Station	P.O. Box 440021	Miami, FL 33144	305-223-8380	marlap@miccosukeetribe.com
Muscogee (Creek) Nation	David Hill	Principal Chief	P.O. Box 580		Okmulgee, OK 74447	800-482-1979	dhill@mcn-nsn.gov
Coushatta Tribe of Louisiana	Jonathan Cernek	Chairperson	P.O. Box 818		Elton, LA 70532	337-584-1401	rrich@coushatta.org

Section 106 Potential Consulting Parties	Dear	Position	Address 1	Address 2	City State Zip	Telephone	Email
Certified Local Government	Kathleen Kauffman	Historic Preservation Officer	Gainesville Historic Preservation Board	P. O. Box 490, Station 11	Gainesville, Florida 32602-0490	352-393-8686	kauffmank1@cityofgainesville.org

SHPO above
Tribes above

U.S. DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

August 3, 2022

SUBJECT: Scoping for an Environmental Assessment of the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy, and Sterile Processing at the Malcom Randall Veterans Affairs Medical Center (MRVAMC) located at 1601 S.W. Archer Road, Gainesville, FL 32608-1197.

Dear Valued Stakeholder:

The U.S. Department of Veterans Affairs (VA) is preparing a Draft Environmental Assessment (EA) to analyze the potential environmental impacts associated with the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy, and Sterile Processing at the Malcom Randall Veterans Affairs Medical Center (MRVAMC) located at 1601 SW Archer Road, Gainesville, FL 32608-1197 (*Figures 1, 2, and 3*). The Proposed Action consists of the demolition of the existing Ambulatory Care Addition (ACA) and replacing it with a new ACA (~249,000 building gross square feet) as well as a new 500-space parking garage to account for the loss of existing surface parking as a result of the construction.

The **purpose** of the Proposed Action is to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies. The Proposed Action is **needed** to bring the MRVAMC services into compliance with VA standards and to provide the standard of care to Veterans in North Florida and South Georgia required to meet current and future VA strategic goals.

This scoping notice has also been published in *The Gainesville Sun* to inform and solicit input from the public. The notice is also available on the VA website at https://www.cfm.va.gov/environmental.

VA will prepare the Draft EA according to the regulations for the implementation of the procedural provisions of the National Environmental Policy Act of 1969 (42 U.S. Code 4321-4370h), as implemented by the Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] 1500-1508), and VA Implementing Regulations (38 CFR Part 26).

VA recognizes that you as an identified Stakeholder and/or your organization may have comments on the scope of issues for analysis or information relevant to the Proposed Action for consideration in the Draft EA. Please submit your comments/information via email within 30 days following receipt of this notice to vacoenvironment@va.gov with the subject line “Malcom Randall VAMC Correction of Ambulatory Care Draft EA.”

VA will address and incorporate relevant comments in the Draft EA. Once VA completes the Draft EA, it will be published and made available for a 30-day public review and comment period. VA will announce the start of this review period by publishing a notice of availability (NOA) of the Draft EA in *The Gainesville Sun*. VA will concurrently notify stakeholders via email/mail and include instructions on how to submit comments.

Respectfully,

GLENN
ELLIOTT

Digitally signed by GLENN ELLIOTT
Date: 2022.08.03 16:35:12 -04'00'

Glenn Elliott
Director, Environmental Program Office
Office of Construction and Facilities Management

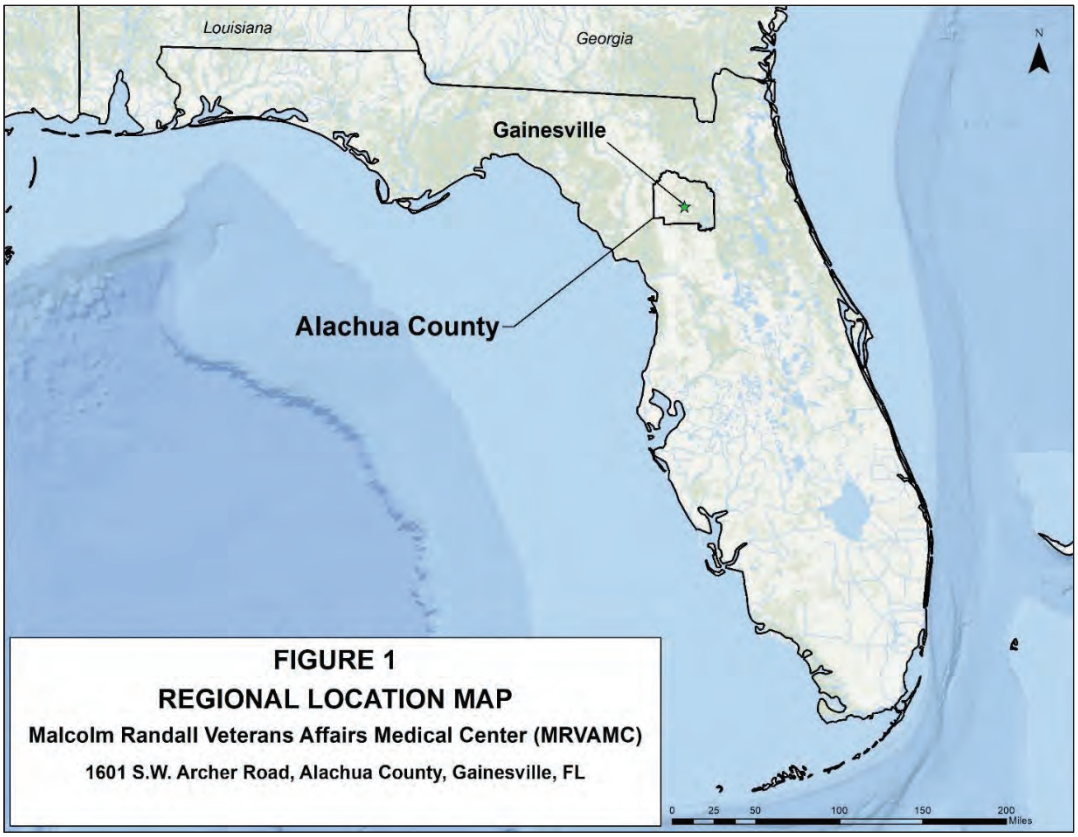

FIGURE 1
REGIONAL LOCATION MAP
Malcolm Randall Veterans Affairs Medical Center (MRVAMC)
1601 S.W. Archer Road, Alachua County, Gainesville, FL

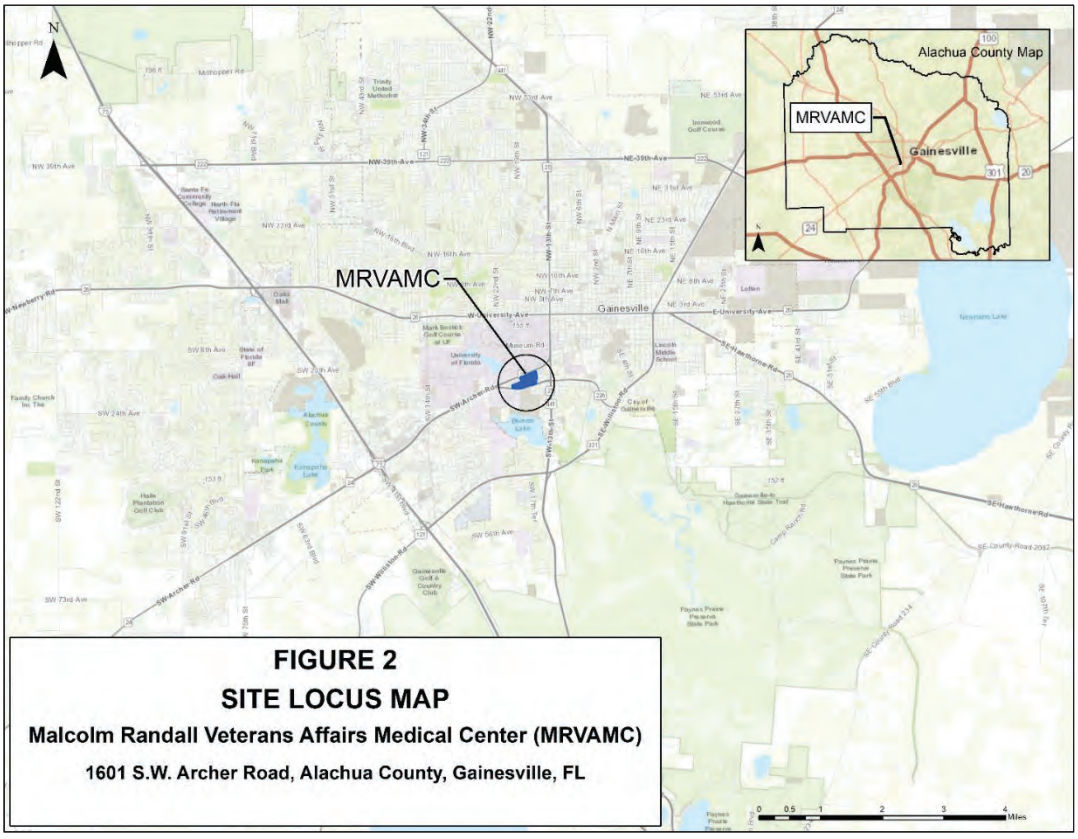

FIGURE 2
SITE LOCUS MAP
Malcolm Randall Veterans Affairs Medical Center (MRVAMC)
1601 S.W. Archer Road, Alachua County, Gainesville, FL

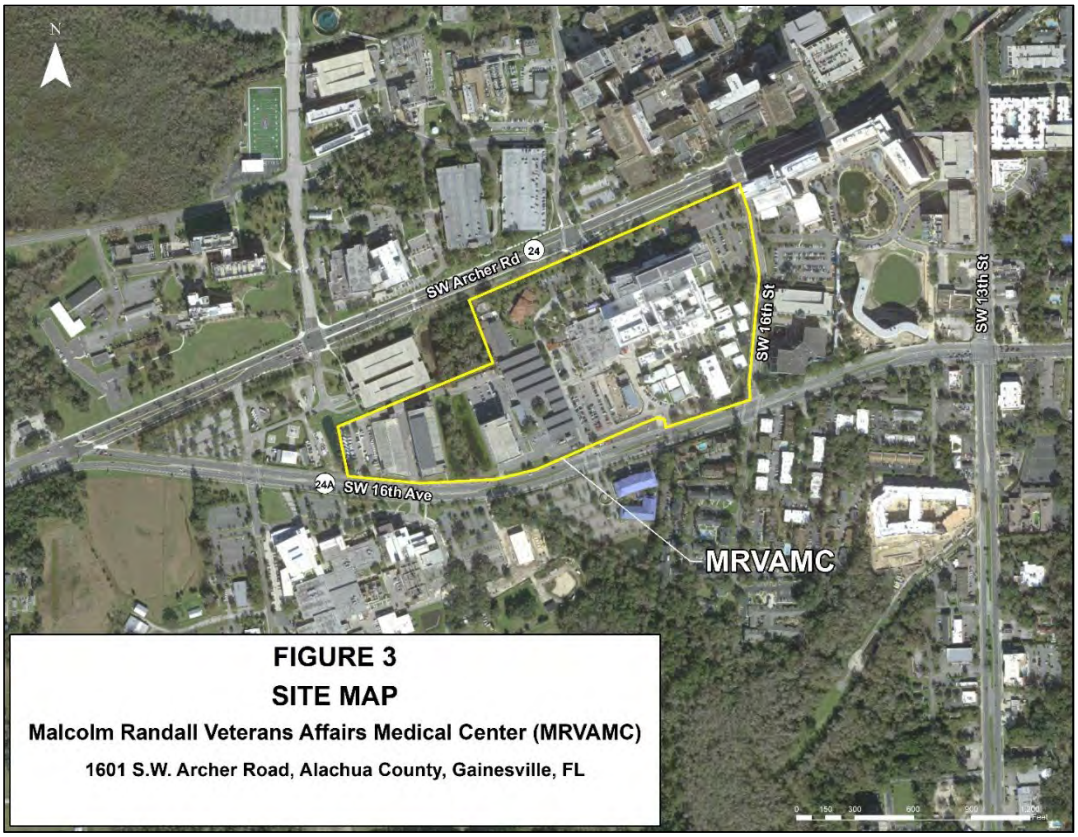

FIGURE 3

SITE MAP

Malcolm Randall Veterans Affairs Medical Center (MRVAMC)

1601 S.W. Archer Road, Alachua County, Gainesville, FL

From: VACO Environment <VACOEnvironment@va.gov>
Sent: Thursday, August 4, 2022 11:39 AM
To: rrich@coushatta.org
Cc: Bennett, Alec (CFM) <Alec.Bennett@va.gov>
Subject: *EXTERNAL* Notice Scoping for an Environmental Assessment of the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy, and Sterile Processing at the Malcom Randall Veterans Affairs Medical Center (MRVAMC)

Dear Chairman Cernek

The U.S. Department of Veterans Affairs (VA) is proposing a project at the Malcom Randall Veterans Affairs Medical Center to demolish the existing Ambulatory Care Addition (ACA) and replace it with a new ACA (~249,000 building gross square feet) as well as build a new 500-space parking garage to account for the loss of existing surface parking because of the construction. As part of the decision-making process, VA will prepare an environmental assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA will initiate formal Section 106 consultation for the undertaking at the appropriate time with the Coushatta Tribe of Louisiana. The Section 106 consultation process and conclusions will contribution to the EA's analysis of potential effects to historic and cultural resources. VA seeks your input on other issues to be addressed during the NEPA process, including environmental concerns. Please see the attached letter for additional project details and how to submit scoping comments.

Respectfully,

Glenn Elliott

Director, Environmental Program Office
Office of Construction and Facilities Management

From: VACO Environment <VACOEnvironment@va.gov>
Sent: Thursday, August 4, 2022 11:40 AM
To: marlap@miccosukeetribe.com
Cc: Bennett, Alec (CFM) <Alec.Bennett@va.gov>
Subject: *EXTERNAL* Notice of Scoping for an Environmental Assessment of the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy, and Sterile Processing at the Malcom Randall Veterans Affairs Medical Center

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Dear Chairperson Cypress,

The U.S. Department of Veterans Affairs (VA) is proposing a project at the Malcom Randall Veterans Affairs Medical Center to demolish the existing Ambulatory Care Addition (ACA) and replace it with a new ACA (~249,000 building gross square feet) as well as build a new 500-space parking garage to account for the loss of existing surface parking because of the construction. As part of the decision-making process, VA will prepare an environmental assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA will initiate formal Section 106 consultation for the undertaking at the appropriate time with the Miccosukee Tribe of Indians of Florida. The Section 106 consultation process and conclusions will contribution to the EA's analysis of potential effects to historic and cultural resources. VA seeks your input on other issues to be addressed during the NEPA process, including environmental concerns. Please see the attached letter for additional project details and how to submit scoping comments.

Respectfully,

Glenn Elliott
Director, Environmental Program Office
Office of Construction and Facilities Management

From: VACO Environment <VACOEnvironment@va.gov>
Sent: Thursday, August 4, 2022 11:40 AM
To: dhill@mcn-nsn.gov
Cc: Bennett, Alec (CFM) <Alec.Bennett@va.gov>
Subject: *EXTERNAL* Notice Scoping for an Environmental Assessment of the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy, and Sterile Processing at the Malcom Randall Veterans Affairs Medical Center (MRVAMC)

Dear Principal Chief Hill,

The U.S. Department of Veterans Affairs (VA) is proposing a project at the Malcom Randall Veterans Affairs Medical Center to demolish the existing Ambulatory Care Addition (ACA) and replace it with a new ACA (~249,000 building gross square feet) as well as build a new 500-space parking garage to account for the loss of existing surface parking because of the construction. As part of the decision-making process, VA will prepare an environmental assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA will initiate formal Section 106 consultation for the undertaking at the appropriate time with the Muscogee (Creek) Nation. The Section 106 consultation process and conclusions will contribution to the EA's analysis of potential effects to historic and cultural resources. VA seeks your input on other issues to be addressed during the NEPA process, including environmental concerns. Please see the attached letter for additional project details and how to submit scoping comments.

Respectfully,

Glenn Elliott

Director, Environmental Program Office
Office of Construction and Facilities Management

From: VACO Environment <VACOEnvironment@va.gov>
Sent: Thursday, August 4, 2022 11:38 AM
Subject: *EXTERNAL* Notice of Scoping for an Environmental Assessment of the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy, and Sterile Processing at the Malcom Randall Veterans Affairs Medical Center

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Dear Valued Stakeholder,

The U.S. Department of Veterans Affairs (VA) is proposing a project at the Malcom Randall Veterans Affairs Medical Center to demolish the existing Ambulatory Care Addition (ACA) and replace it with a new ACA (~249,000 building gross square feet) as well as build a new 500-space parking garage to account for the loss of existing surface parking as a result of the construction. As part of the decision-making process, VA will prepare an environmental assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns. Please see the attached letter for additional project details and how to submit scoping comments.

Respectfully,

Glenn Elliott

Director, Environmental Program Office
Office of Construction and Facilities Management

From: Dean, Kenneth <Dean.William-Kenneth@epa.gov>
Sent: Wednesday, August 31, 2022 3:53 PM
To: VACO Environment <VACOEnvironment@va.gov>
Cc: Buskey, Traci P. <Buskey.Traci@epa.gov>
Subject: [EXTERNAL] Malcom Randall VAMC Correction of Ambulatory Care Draft EA.

Glenn Elliott
Director, Environmental Program Office
Office of Construction & Facilities Management
U.S. Department of Veterans Affairs
Washington DC 20420

Re: Malcom Randall VAMC Correction of Ambulatory Care Draft Environmental Assessment

Dear Mr. Elliot:

The U.S. Environmental Protection Agency (EPA) Region 4 has reviewed your letter, dated August 3, 2022, to "Valued Stakeholders", regarding scoping for an environmental assessment (EA) of the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy, and Sterile Processing at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), located at 1601 S.W. Archer Road, Gainesville, FL 32608-1197. The Proposed Action consists of the demolition of the existing Ambulatory Care Addition (ACA) and replacing it with a new ACA (approximately 249,000 building gross square feet) as well as a new 500-space parking garage to account for the loss of existing surface parking as a result of the construction.

According to the scoping notice, "The purpose of the Proposed Action is to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies. The scoping notice states, "The Proposed Action is needed to bring the MRVAMC services into compliance with VA standards and to provide the standard of care to Veterans in North Florida and South Georgia required to meet current and future VA strategic goals." According to the letter, the U.S. Department of Veterans Affairs (VA) is preparing a Draft EA to analyze the potential environmental impacts associated with the Proposed Action. The VA is seeking comments from the EPA on the scope of issues for analysis or information relevant to the Proposed Action for consideration in the Draft EA.

Based on the EPA's review of available information, the following comments are provided for your consideration.

1. Noise: Noise impacts are predicted to result from the demolition of the existing ACA and the construction of the new ACA. The EPA understands that noise sensitive medical facilities are located in the vicinity of the MRVAMC. The EPA recommends that the VA provide early information and schedules on demolition and construction activities and expected noise levels and duration to personnel of the nearby facilities. A mechanism for reporting construction-related noise concerns should be established if the noise levels are determined to approach/exceed the noise abatement criteria. The EA should estimate the total project construction time (months, years) in order to assess the general magnitude and/or duration of the potential construction noise impact.

2. Stormwater Management: Excessive sediment loads from construction activities can enter waterbodies and alter the specific water quality and habitat characteristics fish populations and other biological communities need for survival. The EPA encourages implementing best management practices

during and after construction to minimize stormwater impacts on the streams. Coverage under a statewide National Pollutant Discharge Elimination System (NPDES) construction stormwater general permit will be needed if the project disturbs one acre or more of contiguous land. The EPA recommends that erosion control and sediment control measures be implemented in accordance with the State's NPDES construction general permit requirements.

3. Management and Disposal of Wastes/Hazardous Wastes: The NEPA document should include a discussion that addresses demolition and construction debris. The EPA recommends the VA ensures that all wastes from the demolition of the existing ACA be properly handled by licensed contractors and disposed in licensed sanitary landfills for each type of debris in accordance with local, state, and federal requirements. The NEPA document should also address proper handling of hazardous materials removal and disposal (e.g., asbestos, polychlorinated biphenyls, lead from paint). Reuse, recycling, and reclamation should be viewed as ways of managing hazardous wastes which, if properly conducted, can avoid environmental hazards, protect scarce natural resources, and reduce the nation's reliance on raw materials and energy. Promoting reuse and recovery is certainly one of the goals of Resource Conservation and Recovery Act; however, this goal does not take precedence over ensuring the proper management of hazardous waste.

4. Energy Conservation: Given the national energy policy, resource conservation measures that minimize impacts from major federal facilities are important. The EPA understands that the VA has a Sustainability Performance Plan, which includes "approaches for reducing energy use and cost, finding renewable or alternative energy solutions and using recycled and sustainably produced materials." The EPA recommends that the VA consider green building practices that provide an opportunity to create environmentally- sound and resource-efficient buildings by using an integrated approach to design.

5. Short-Term Air Impacts: Localized impacts to air quality could occur during construction due to equipment exhaust emissions and fugitive dust. The EPA recommends the VA implement measures to reduce diesel emissions from construction equipment. The EPA also encourages controlling fugitive dust by watering or the application of other controlled materials.

The EPA appreciates the opportunity to provide scoping comments on the proposed action. If you have any questions regarding the EPA's comments, please contact me by phone at 404-562-9378 or via email at dean.william-kenneth@epa.gov.

William Kenneth Dean
Acting Chief, NEPA Section
Strategic Programs Office
Office of the Regional Administrator
U.S. Environmental Protection Agency, Region 4
Office: (404) 562-9378
Mobile: (678-628-2079

North Florida/South Georgia Veterans Health System
1601 Southwest Archer Road
Gainesville, Florida 32608

U.S. Department of Veterans Affairs
Veterans Health Administration
Malcom Randall VA Medical Center

5 October 2022

Timothy Parsons, PhD
Division Director, State Historic Preservation Officer
Florida Division of Historical Resources
R.A. Gray Building
500 South Bronough Street
Tallahassee, Florida 32399-0250

Via email to: CompliancePermits@dos.myflorida.com

Subject: Initiation for Section 106 Consultation RE: Environmental Assessment of the Proposed Action to Correct Non-Compliant Surgical, Emergency, Pharmacy, and Sterile Processing Services at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197

Dear Dr. Parsons:

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is initiating Section 106 consultation with the Florida State Historic Preservation Office (SHPO) for the above-referenced project.

The undertaking is defined as the Proposed Action to demolish the existing Ambulatory Care Addition (ACA) and replace it with a new Hospital Services Addition (HSA) (approximately 249,000 building gross square feet) and a new 500-space parking garage to account for the loss of existing surface parking as a result of constructing the HSA. The purpose of the Proposed Action is to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies.

VA is initiating Section 106 consultation with the Florida SHPO for this undertaking as it does not meet the definition of routine activities as defined in Appendix B of the *Programmatic Agreement (PA) for Routine Management Activities at Ten VA Medical Centers in Florida* (dated August 12, 2015). VA has also initiated Section 106 consultation with the Gainesville Historic Preservation Board, Miccosukee Tribe of Indians of Florida, Muscogee (Creek) Nation, and Coushatta Tribe of Louisiana.

In April 2022, VA completed the attached Initial Cultural Resource Analysis Report for the Proposed Action, which includes a defined Area of Potential Effect.

Pursuant to 36 CFR 800.4(d)(1) and subject to your review of the attached documentation required by 36 CFR 800.11(e), VA finds that the undertaking will result in no historic properties affected. VA asks for your concurrence with this finding.

Should you have questions about this particular project, please feel free to contact Edwin Burnett at Edwin.Burnett@va.gov or (352) 548-6000 Ext. 106927.

Sincerely,

Wende Dottor
Acting Executive Health System Director
VA North Florida/South Georgia Healthcare

Attachment A: *Initial Cultural Resource Analysis Report, April 2022*

cc: Patrick Read, VA CFM Environmental Engineer
Alec Bennett, VA CFM Senior Historic Preservation Specialist
Jeffrey Carrington, Project Manager, VA Eastern Region Office
Edwin Burnett, Chief, Facilities Management Service, Malcom Randall VAMC

ATTACHMENT A
Initial Cultural Resource Analysis Report, April 2022

INITIAL CULTURAL RESOURCES ANALYSIS

MALCOM RANDALL VETERANS AFFAIRS HOSPITAL, ALACHUA COUNTY, FLORIDA

Commonwealth Heritage Group, Inc.
April 22, 2022

1 Introduction

The U.S. Department of Veterans Affairs (VA) is considering possible modifications to the existing Malcom Randall VA Medical Center (MRVAMC) located in Gainesville, Alachua County, Florida (Figure 1 and Figure 2). A Programmatic Agreement (PA) for Routine Management Activities at Ten VA Medical Centers in Florida, dated August 12, 2015, includes the Gainesville facility [MRVAMC] and states:

> *Given the absence of historic properties on the facilities, no further consultation with SHPO or other consulting parties is necessary for any routine management activities listed in Appendix B, unless there is an unanticipated discovery (ACHP 2015:2).*

However, Appendix B indicates that routine activities do not cover construction or demolition related to the existing structures (ACHP 2015:B-1-B-2). Since both activities are under consideration as part of the proposed undertaking, an initial cultural resources analysis of the property has been performed in compliance with NHPA requirements. Under subcontract to Mabbett & Associates, Inc. (Mabbett), Commonwealth Heritage Group, Inc. (Commonwealth) prepared this initial cultural resources analysis. Lucy B. Wayne, Ph.D., RPA, Regional Director for Commonwealth's Gainesville, Florida office served as Principal Investigator and Project Manager for the analysis. Dr. Wayne is an archaeologist and architectural historian. She was assisted by John Davidson, B.A., Staff Archaeologist and Graphics Manager, for fieldwork, background research, and graphic preparation.

2 Project Approach

Commonwealth's initial task was to complete a search of the Florida Master Site File (FMSF) GIS database to determine whether there had been previous surveys in the vicinity of the hospital and what previously identified cultural resources were located within one mile of the MRVAMC property. Commonwealth also reviewed old and new aerial photographs, topographic and soils maps, the Alachua County Property Appraiser's file, historic information on the project area and overall cultural history of the area.

Fieldwork was performed on March 23, 2022, and was limited to photographing the exterior of the original MRVAMC building (Building 1), the proposed project area and the other permanent buildings on the VA property. The Staff Archaeologist who took the photographs also noted any relatively undeveloped areas that might contain undisturbed archaeological resources.

Figure 1. Location of Malcom Randall VA Medical Center, Gainesville, Alachua County, Florida (Source: DeLorme 2013)

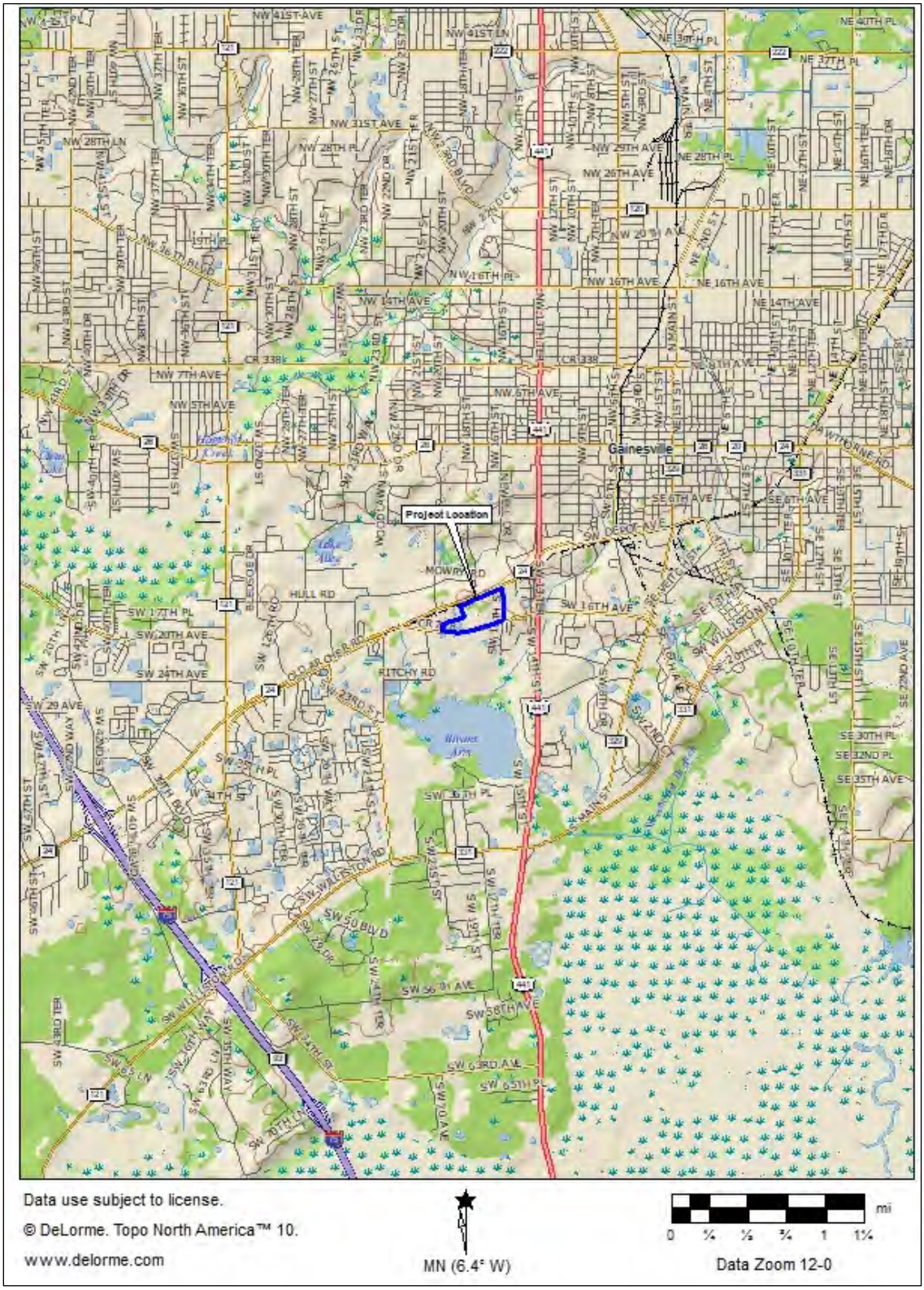


Figure 2. Aerial Photograph with Area of Potential Effect (APE) boundary
Malcom Randall VA Medical Center, Gainesville, Alachua County, Florida
(Sources: Google 2022; Mabbett 2021)

3 Area of Potential Effect

The MRVAMC is located on the southeast side of Archer Road [State Road (SR) 24] and the northwest side of SW 16th Avenue in southwest Gainesville (Figure 2). It is in Section 7 of Township 10 South, Range 20 East of Alachua County. The MRVAMC is surrounded by facilities of the University of Florida (UF), particularly hospitals, clinics, and medical school, with apartment complexes to the south and the UF Veterinary College to the southwest (Figure 2). The entire area is heavily developed with underground utilities, roads, sidewalks, and parking lots. The only undeveloped land consists of small landscaped areas of lawn, shrubberies, trees, and plants. The project Area of Potential Effect (APE) is limited to the portion of the MRVAMC property where demolition and construction will occur (Figures 2 and 3).

4 Cultural History

The APE is located about halfway between two natural lakes: Lake Alice to the northwest and Bivans Arm to the south. These lakes and the drainageways which run into them would be the closest natural water sources. The lakes are over 800 meters from the APE. Soils in the APE are Kanapaha sand, a poorly drained upland soil. This soil type supports slash and loblolly pine, water, live and laurel oak, sweetgum and holly, with an understory of waxmyrtle, huckleberry and grasses (USDA 1985). The natural environment would have been Upland Hardwood Hammocks, a productive environment which could provide botanical resources such as cherries, acorns, pignut hickories, greenbriar, wild grapes and blackberries. Faunal resources would include raccoons, opossums, southern flying squirrels, gray squirrels, gray foxes, bobcats, deer, and a variety of birds (SWCS 1989). The lakes would provide fish, amphibians, reptiles, and water birds. Given this location, the area would have been attractive to Native American hunter-gathers.

The APE is within the North Central prehistoric cultural region of Florida (Milanich 1994). The best current summary of Native American occupation of this region is found in *Archaeology of Precolumbian Florida* and *Florida Indians and the Invasion from Europe* (Milanich 1994, 1995). The following paragraphs summarize the prehistory and history of the area in order to provide context for understanding the known and potential cultural resources in the area.

The majority of the identified prehistoric sites in this region date from the Archaic to European contact periods (7,500 B.C. to A.D. 1565). Occasional Paleoindian artifacts and sites have been identified (10,000 to 7,500 B.C.), but these are rare compared to materials from later periods. Early to Middle Archaic sites are defined by lithic artifacts consisting of debitage (fragments) from quarrying stone and toolmaking/maintenance, along with large stemmed points identified as Florida Archaic Stemmed points. During the Late Archaic (2,000 to 1,000 B.C.) slab-constructed Orange ceramics tempered with plant fibers appear in the artifact assemblage (Milanich 1994; Milanich and Fairbanks 1980).

Figure 3. Proposed Construction Area Southwest of Main Building, Malcom Randall VA Medical Center, Gainesville, Alachua County, Florida

MRVAMC, West end, proposed demolition and construction location

MRVAMC, West end, proposed demolition and construction location

MRVAMC, West end, proposed demolition and construction location

Following the Archaic periods, the periods classified as Woodland dominate. Sites from these periods indicate a less migratory pattern with villages, burial mounds, and ceremonial sites. Prior to A.D. 200 North Central Florida sites include evidence of the St. Johns culture from East Florida, distinguished by chalky ware ceramics with sponge spicules in the paste. Although a variety of surface decorations occur, check stamping becomes prevalent. During the same period, there is evidence of occupation by Deptford people from the northwest and west coastal region. Deptford ceramics are sand or grit tempered, but check stamping is also common. During the early ceramic periods, sites tend to be small camps associates with major water sources (Milanich 1994; Milanich and Fairbanks 1980).

Beginning about A.D. 200 and continuing until about A.D. 600, a specific regional adaptation has been identified in North Central Florida. These Cades Pond sites have been documented in a limited area bounded roughly by the Santa Fe River on the north and Orange Lake on the south (although one site from this period was identified slightly further south in Marion County). Cades Pond sites are found in proximity to extensive swamp areas and/or large lakes with a focus on exploitation of wetland environments. Ceramics are dominated by plain sand tempered wares, but Deptford, Weeden Island and St. Johns wares are also common. A distinctive point called Cades Pond blades are frequently found on the sites (Milanich 1994; Milanich and Fairbanks 1980).

After A.D. 600, a new cultural group identified as Hickory Pond, appeared in North Central Florida. This group is thought to have spread south from Georgia into Florida. Hickory Pond sites are characterized by plain and Prairie Cord Marked sand tempered ceramics. The final prehistoric cultural group—Alachua—evolved from Hickory Pond. Alachua people practiced intensive horticulture, supplemented by hunting/gathering. The sites tend to be in areas of better agricultural soils on high ground in proximity to lakes and ponds. Occupation was considered to be semi-permanent with some seasonal migration to the coasts (Milanich 1994; Milanich and Fairbanks 1980). The Alachua people were identified as the Potano by the Spaniards when European contact occurred (Milanich 1995).

Although there was some historic Seminole activity in the Alachua County area between 1715 and 1842, settlements tended to be small. The Seminole were pushed into this region after the Treaty of Moultrie Creek in 1823, and primarily settled in proximity to Paynes Prairie where they exploited cattle introduced by Spaniards. After the Second Seminole War of 1835 to 1842, the remaining Seminole were forced to migrate to Oklahoma or retreat to the Everglades in South Florida.

European settlement began with a Spanish ranch on Paynes Prairie south of the APE. The first community settled in the area was Micanopy, south of the Prairie and in the vicinity of the previous Seminole town of Cuscawilla. There was little settlement in the area during the Spanish and British periods beyond the ranch, attempts at Spanish missions and trade with the Native Americans. After the U.S. acquired Florida in 1819, a number of planters from Georgia and South Carolina moved to the region, particularly to raise Sea Island cotton. The initial county seat was at Newnansville north of the present City of Gainesville. The county seat was moved to Gainesville in 1853 to take advantage of the new railroad line being put through the area. The southwestern part of what is now the city remained largely rural until the early 20th century. When the University of Florida was established in Gainesville in 1906, the area began to grow with housing and businesses in support of the University.

When the first land surveys of this area were made after the U.S. acquired Florida, the APE was part of the huge Arredondo Grant. By 1845, portions of the grant had been obtained or granted to other individuals. The south end of what is now Section 7 includes part of two those grants—the D. L. Clinch Grant on the east and the Thomas Napier Grant on the south (Washington 1845). The APE is located in a segment of Section 7 between the two grants. The 1845 map shows that the north boundary of the Napier Grant ran through Bivans Arm, which is about 850 meters south of the APE. The survey notes for the grant map describe the boundaries of the two grants as in hammock with brooks or branches. The road between Newnansville and Fort Tarver was noted on the map to the west of the APE (Washington 1845).

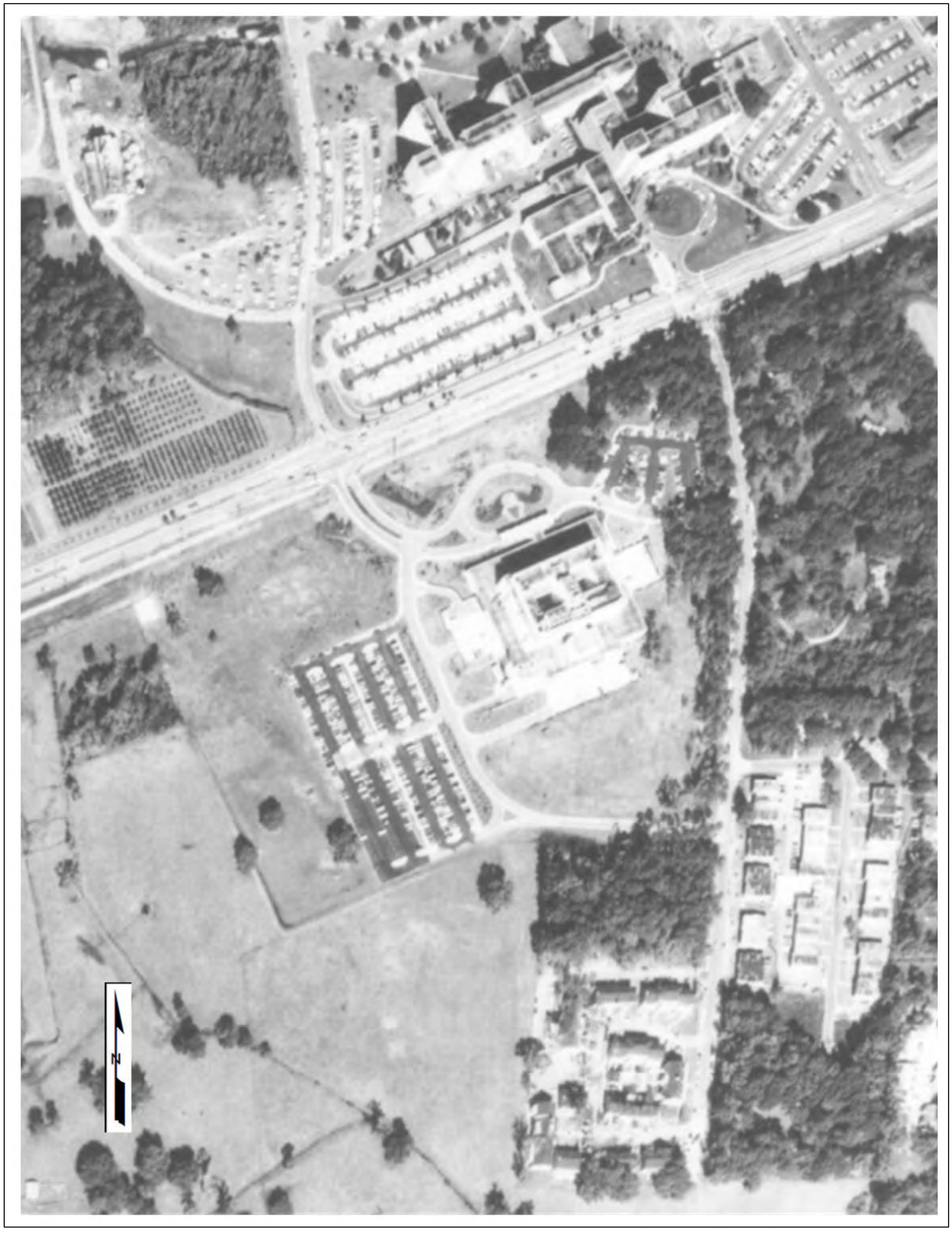
Commonwealth's review of readily available historic information (local histories, historic maps, online sources) found no subsequent information on the history of the APE prior to the 20th century. In 1937, the APE was primarily agricultural (Figure 4). The Fernandina to Cedar Key railroad line was still present on the south side of Archer Road and the APE seems to be a farmstead (west of the pond).

Location of a VA hospital in Gainesville was approved by President Harry Truman in 1945, but construction did not begin until 1964 on 31 acres of land acquired by the VA. The 480-bed hospital was dedicated in 1967 (http://va.gov/north.florida.health.care 2022) (Figure 5). The picture below shows the original hospital building in 1978. Since that date, the MRVAMC has been expanded and modified with additions including new wings, a tower, a Fisher House, utility buildings, offices, and parking facilities (compare Figures 2 and 5). The exterior has also been modified from its original appearance.

Malcom Randall VA Medical Center in 1978, Gainesville, Alachua County, Florida
(Source: Resvanis 2018)

Figure 4. Malcom Randall VA Medical Center APE in the Early 20th Century Alachua County, Florida (Source: USDA 1937)

Figure 5. Malcom Randall VA Medical Center in 1968, Gainesville, Alachua County, Florida (Source: USDA 1968)



5 Previous Surveys and Recorded Cultural Resources

A review of the FMSF GIS database shows that there have been 20 cultural resources studies completed within a mile of the APE (Table 1). This includes five completed by Commonwealth staff (Surveys #6882, 22229, 22902, 23599 and 25043). Four of the surveys were limited to historic structures, including one county-wide survey (Surveys #4724, 5986, 10656 and 14508). Five of the surveys were for cellular communication towers (Surveys #7593, 8294, 9131, 9945 and 17734; this type of survey is very limited in nature with the archaeology confined to the footprint of the tower compound and only *National Register*-listed or eligible buildings reviewed. The closest surveys to the APE were the historic documentation of the former Gainesville-South Florida Railroad (Survey #14508) which ran along the south side of Archer Road, and the UF Shands Hospital re-development tract (Survey #12766) which is immediately east of the APE.

These surveys have resulted in identification of numerous cultural resources within one mile of the APE (Figure 6 and Table 2). Not all cultural resources are classified as eligible for the *National Register.* The final column in Table 2 indicates whether or not a resource is classified as eligible, ineligible or has not been evaluated by the State Historic Preservation Office. [Note: Due to the large number of historic structures recorded within one mile of the APE only the *National Register*-eligible structures outside the boundaries of the identified historic districts within one mile are listed in Table 2. For example, twelve structures within the University of Florida Campus Historic District (8AL2552) north of the APE are individually listed on the *National Register*, but only the district itself is listed in Table 2.]

Table 1. Previous Surveys Within One Mile of the Malcom Randall VA Medical Center APE, Gainesville, Alachua County, Florida

Survey #	Year	Survey Area	Type of Survey
4724	1995	University-related thematic survey	Architectural
5986	2000	County-wide historic structure survey	Architectural
6882	2002	UF Genetics & Cancer Research Center	CRAS
7593	2000	Idlylwild	Cellular tower
8294	2002	Lake Alice	Cellular tower
9131	2003	GRU/Police Station	Cellular tower
9902	2004	SR 329	CRAS
9945	2004	Evergreen	Cellular tower
10161	2007	Depot Avenue	CRAS
10656	2004	UF World War II and Post-War historic campus	Architectural
12766	2006	Shands Hospital Re-development Tract	CRAS
14508	2006	Florida Railroad documentation	Historic
17734	2007	Gainesville-South Florida	Cellular tower
18262	2010	SR 226	CRAS
21115	2014	UF Greenway	CRAS
22229	2015	UF ODAS Utilities Building Power	CRAS
22902	2016	UF IFAS Building 675	CRAS
23599	2016	UF Newell and Museum Roads tract	CRAS
24694	2017	UF large commuter parking lot	CRAS
25043	2018	UF Band Field Project	CRAS
Source: FMSF 2022			

Figure 6. Topographic Map with Known Cultural Resources within One Mile of Malcom Randall VA Medical Center, Gainesville, Alachua County, Florida (Sources: USGS 1988, 1994; FMSF 2022; DeLorme 2013)

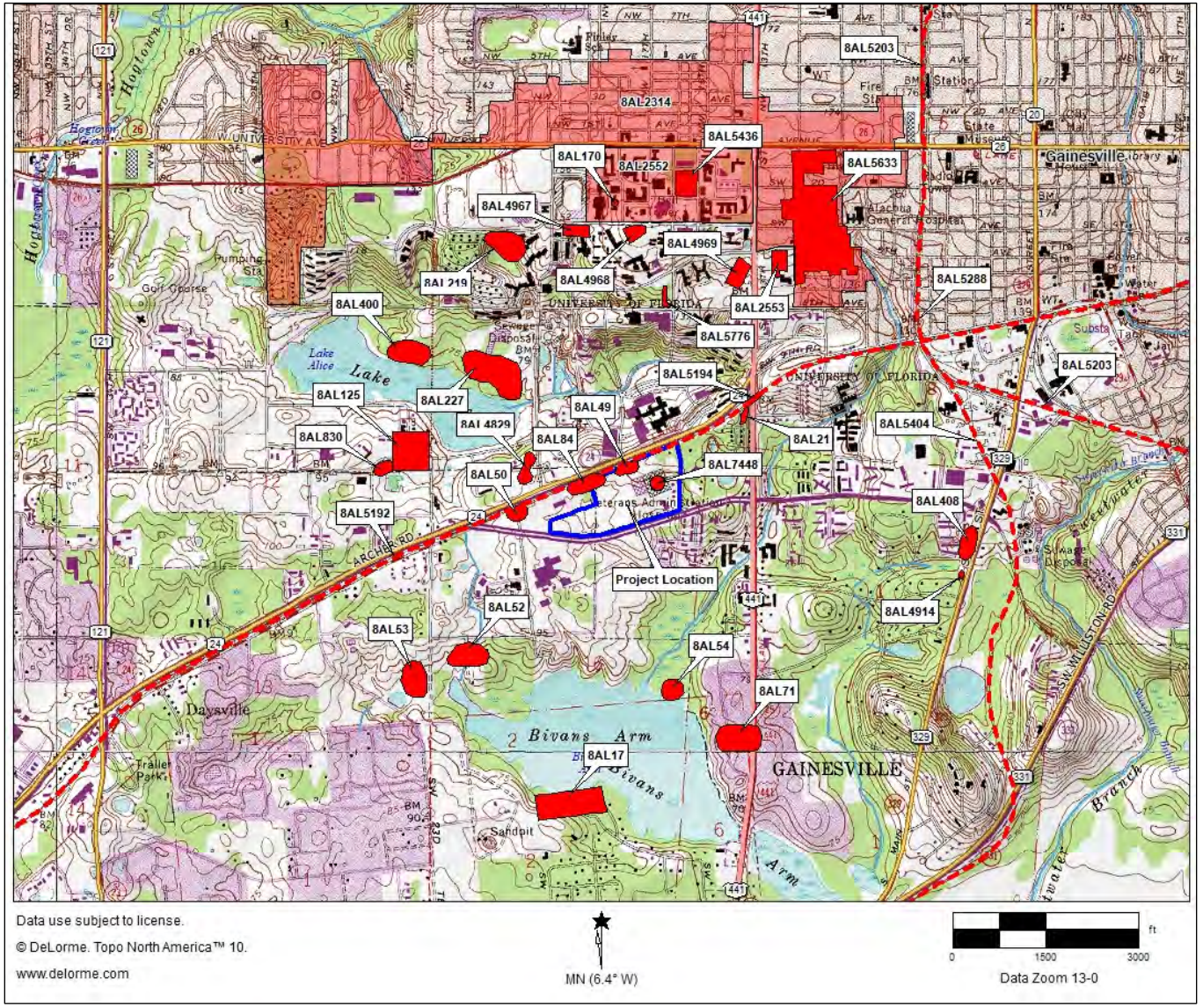


Table 2. Cultural Resources Within One Mile of Malcom Randall VA Medical Center, Gainesville, Alachua County, Florida

Site #	**Name**	**Type of Resource**	**NRHP Status***
Archaeological Sites [Note: GV indicates exact location not known]			
8AL17(GV)	Bivan's Arm	Prehistoric lithic scatter	Not evaluated
8AL21	Little Gandy	Alachua and 20th c. habitation	Not evaluated
8AL49	Shirea Mound	Prehistoric burial mound	Not evaluated
8AL50	Archer Road Campus	Alachua artifact scatter	Not evaluated
8AL52	West Bivan's Arm	Alachua and contact period artifact scatter	Not evaluated
8AL53	Cameron's	Archaic lithic scatter	Not evaluated
8AL54	North Bivan's Arm	Alachua artifact scatter	Not evaluated
8AL71	NE Bivan's Arm	Unspecified	Not evaluated
8AL84	Shirea Mound Village	Deptford occupation	Not evaluated
8AL125(GV)	Lake Alice	Alachua village	Not evaluated
8AL170	unnamed	Deptford artifact scatter	Not evaluated
8AL219	unnamed	Deptford artifact scatter	Not evaluated
8AL227	unnamed	Prehistoric artifact scatter	Not evaluated
8AL400	unnamed	Prehistoric lithic scatter	Not evaluated
8AL408	South Main Street	Multicomponent prehistoric site	Ineligible
8AL830	City of Gainesville Survey A	Alachua site	Not evaluated
8AL4829	Pony Site	Prehistoric habitation site	Not evaluated
8AL4914	Billy's Day Out	Prehistoric lithic scatter	Ineligible
9AL5776	McCarty Woods	Multicomponent artifact scatter	Not evaluated
Resource Groups			
8AL2552	UF Campus Historic District	Boom/Depression period campus	Listed 1989
8AL2314	University Related Residential	20th century historic district	Not evaluated
	Thematic District		
8AL5436	The Meadow	Historic landscape	Eligible
8AL5404	Tampa Jacksonville Railroad	19th century railroad	Not evaluated
8AL5288	Gainesville and Gulf Corridor	Late 19th century railroad	Ineligible
8AL5192	Florida Railroad Corridor	19th century railroad	Eligible
8AL5203	Atlantic Coastline Railroad	20th century railroad	Ineligible
8AL5633	University Heights Historic		
	District South	1920s historic district	Not evaluated
Bridge			
8AL5194	Gainesville Railroad Bridge	ca. 1957 railroad bridge	Eligible
National Register Listings			
8AL2552	UF Campus Historic District	Boom/Depression period campus	Listed 1989
8AL2553	Old P.K. Yonge Laboratory	UF teaching school	Listed 1990
	School		

Site #	Name	Type of Resource	NRHP Status*
8AL4968	The Hub	UF student center	Listed 2008
8AL4969	Yulee-Mallory-Reid Dormitory	UF dormitories	Listed 2008
	Complex		
8AL4967	Engineering Industries Building	UF classrooms and laboratories	Listed 2008
Note: NRHP Status refers to eligibility to the *National Register of Historic Places*			
* *National Register of Historic Places* status			
Source: FMSF 2022			

Two of the previously recorded archaeological sites—8AL49 and 8AL84—are mapped within the MRVAMC immediately adjacent to Archer Road (Figure 2). The Shirea Mound, 8AL49, is classified as a prehistoric Native American burial mound, and 8AL84 is the associated Shirea Mound Village, which is classified as a Deptford site. Neither site has been evaluated for eligibility to the *National Register*. The original 1948 record for the Shirea Mound described it as a sand burial mound with a house built on top of it. It was noted that the mound was disturbed—presumably by the house and associated landscaping (FMSF 2022). A subsequent 1978 article classified the site as Cades Pond (Hemmings 1978). The FMSF form notes that a UF graduate student conducted excavations at the site in the 1980s, but no additional information was provided on that work (FMSF 2022). The Village site was recorded in 1949 as a flint and sherd area identified in a vegetable garden adjacent to the mound. Collected artifacts consisted of one Swift Creek Complicated Stamped sherd (a Georgia form) and 18 plain gritty sherds (FMSF 2022). Given the extensive development in this area and widening of Archer Road, it is probable that both sites have been obliterated. Comparison of the recorded geographic coordinates of the mound and village to present APE coordinates suggest that the sites are located approximately in the area of the main entrance road to the MRVAMC.

The historic Florida Railroad Corridor, 8AL5192, ran along the south side of Archer Road. This was Florida's first railroad line, connecting Fernandina Beach in northeast Florida with Cedar Key on the Gulf coast. Although the corridor is considered eligible for the *National Register*, all rails and ties from the railroad have been removed throughout the original cross-Florida corridor. The only possible evidence of the railroad in the vicinity of the MRVAMC is a raised area with a bicycle/pedestrian lane adjacent to Archer Road.

6 Above-Ground Resources

There are no above ground historic resources within the APE.

7 Identified Consulting Parties

The primary party which would have an interest in cultural resources at the MRVAMC would be the Florida State Historic Preservation Office (SHPO). The City of Gainesville Planning Department has historic preservation specialists but there is not a city ordinance concerning archaeological or historic properties. Alachua County has an ordinance regarding archaeological and historical resources which is enforced by the County Department of Environmental Protection.

However, the MRAMC is in the city, not the county, so the ordinance is probably not applicable as the two governments operate separately on most permitting issues. The St. Johns River Water

Management District and the Florida Department of Environmental Protection both have the right to request cultural resource surveys, but it is unlikely they would do so for modifications to an existing hospital since impacts to the natural environment are unlikely. There are five federally recognized Native American tribes who at times consult on cultural resources in Florida, but they are unlikely to have an interest in expansion of an existing 20th century medical facility. Contact information for the potentially interested parties is provided as an appendix to this document.

Figure 7. Site Plan, Malcom Randall VA Medical Center, Gainesville, Alachua County, Florida (Source: John Poe Architects 2021)

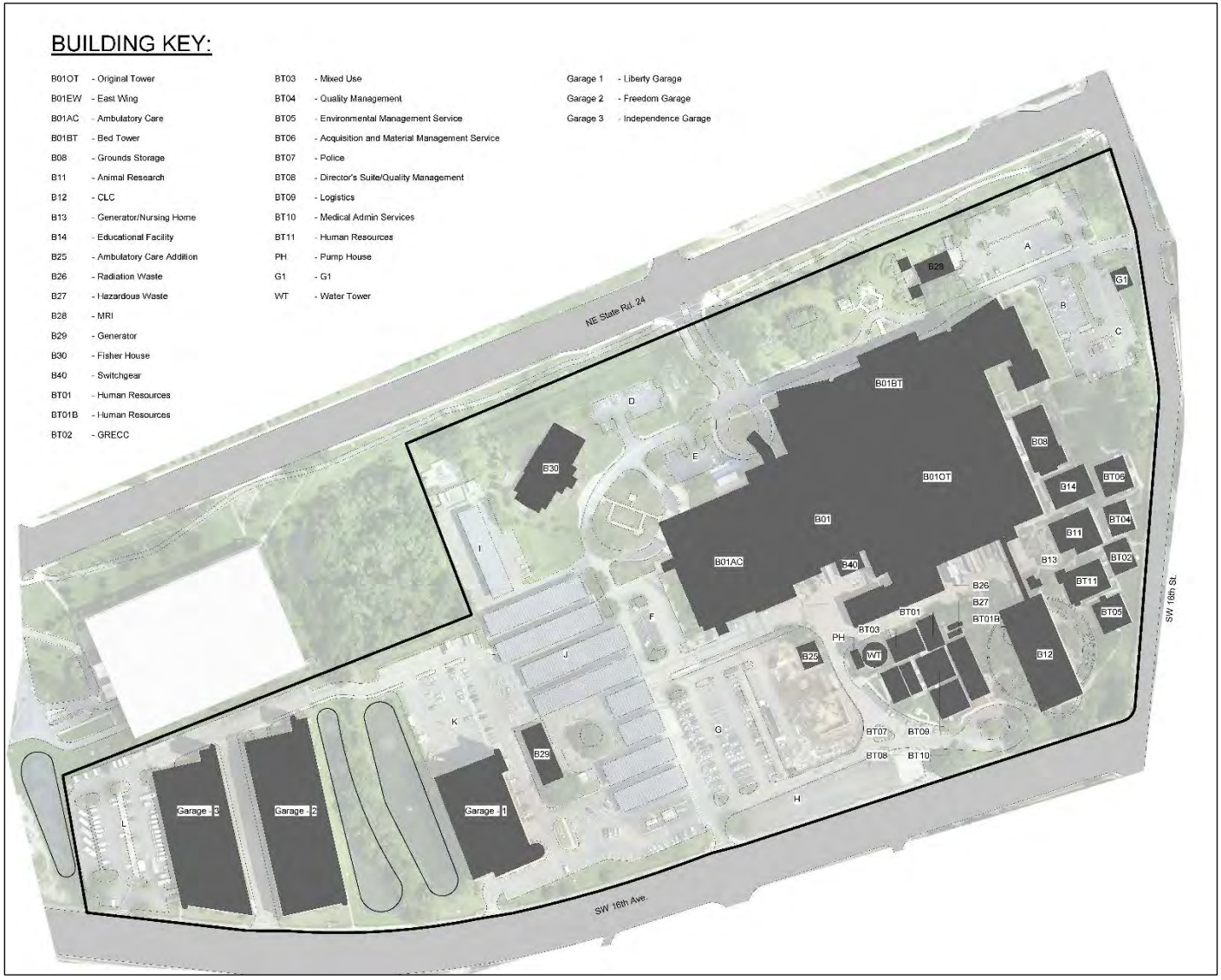


Figure 8. Representative Photographs, Malcom Randall VA Medical Center, Gainesville, Alachua County, Florida

North side of VA Medical Center, West and North facades

North side of VA Medical Center, North and East facades

VA Medical Center, CLC, East facade

VA Medical Center, Second Tower, South facade

Water tank

VA Medical Center, Power Building, West facade

Figure 9. Current Pictures Original Building, Malcom Randall VA Medical Center, 8AL7448, Gainesville, Alachua County, Florida

8AL7448, East facade

8AL7448, East and South facades

8AL7448, South facade

8AL7448, West end of South facade

8AL7448, Southwest corner (right side of image)

8 Conclusions and Recommendations

None of the other previously recorded cultural resources will be impacted by modifications to the MRVAMC. It is likely that the APE has been so disturbed by buildings, pavement, sidewalks, utilities, and landscaping that no intact archaeological sites remain. There are, in fact, very few areas where subsurface testing could even be conducted because of the development of the property (see Figure 3).

It is the opinion of Commonwealth's archaeologists and architectural historian that proposed modifications to the MRVAMC would not impact any archaeological or historical resources listed on or eligible for the *National Register of Historic Places.* This supports a finding of "No Historic Properties Affected" [36 CFR Part 800.4(d)(1)]. Development of the area since 1967 has left little space where archaeological testing could be conducted, and the entire area has been extensively disturbed by construction and landscaping. While the original MRVAMC is old enough to be classified as a historic structure, it is a standard late 20th century commercial form with extensive alterations and additions which have adversely impacted its original design, construction, and materials. It does not meet the criteria for eligibility to the *National Register*. In addition, the proposed demolition/construction area (Figure 2 and 3) is located at one of the more recent additions to the building and in a parking lot, so the original building is unlikely to be impacted.

9 REFERENCES CITED

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2015 Programmatic Agreement Among the Veterans Health Administration of the U.S. Department of Veterans Affairs, the Florida State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Management Activities at 10 VA Medical Facilities in Florida. Washington, DC.

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www.prweb.com

2011 Malcom Randall VA Medical Center Patient Tower Addition Now Open to Veterans. Web page news article.

APPENDIX

IDENTIFIED CONSULTING PARTIES
MALCOM RANDALL VA MEDICAL CENTER
GAINESVILLE, ALACHUA COUNTY, FLORIDA

Identified Party	Name/Department	Address	Phone
Florida State Historic Preservation Officer (SHPO)	Timothy Parsons, Ph.D.	500 So. Bronough Street Tallahassee, FL 32399	850-245-6333
Gainesville Historic Preservation Board	Kathleen Kauffman, Historic Preservation Officer	P. O. Box 490, Station 11 Gainesville, Florida 32602-0490	352-393-8686
Coushatta Tribe of Louisiana	Jonathan Cernek, Chairperson	P.O. Box 818 Elton, LA 70532	337-584-1401
Miccosukee Tribe of Indians of Florida	Talbert Cypress, Chairperson	Tamiami Station PO Box 440021 Miami, FL 33144	305-223-8380
Muscogee (Creek) Nation	David Hill, Principal Chief	PO Box 580 Okmulgee, OK 74447	800-482-1979

From: Burnett, Edwin J. <Edwin.Burnett@va.gov>
Sent: Tuesday, October 18, 2022 12:01 PM
To: CompliancePermits@dos.myflorida.com; Read, Patrick R. (CFM); Bennett, Alec (CFM)
Cc: Glucksman Andrew; Samantha H. Grabelle
Subject: *EXTERNAL* Initiation of Section 106 Consultation Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197
Attachments: SIGNED Template Letter VA OCFM - Gainesville VAMC - Section 106 - SHPO w attachment.pdf

Dear Mr. Parsons,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is sending the attached letter to initiate consultation with the Florida State Historic Preservation Office (SHPO) for the referenced project at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197.

Please confirm receipt of this email.

The VA looks forward to receiving your response.

Thank you,

Ed Burnett
Chief, Facilities Management Service
North Florida/South Georgia Veterans Health System
Office: (352) 548-6000 Ext. 106927
Cell: (352) 233-6033

From: Burnett, Edwin J. <Edwin.Burnett@va.gov>
Sent: Tuesday, October 18, 2022 12:43 PM
To: kauffmank1@cityofgainesville.org; Read, Patrick R. (CFM); Bennett, Alec (CFM)
Cc: Glucksman Andrew; Samantha H. Grabelle
Subject: *EXTERNAL* Initiation of Section 106 Consultation Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197
Attachments: SIGNED Template Letter VA OCFM - Gainesville VAMC - Section 106 - Gainesville Historic Preservation Board.pdf

Dear Ms. Kauffman,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is sending the attached letter to initiate consultation with the Gainesville Historic Preservation Board for the referenced undertaking at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197.

Please confirm receipt of this email.

The VA looks forward to receiving your response.

Thank you,

Ed Burnett
Chief, Facilities Management Service
North Florida/South Georgia Veterans Health System
Office: (352) 548-6000 Ext. 106927
Cell: (352) 233-6033

From: Burnett, Edwin J. <Edwin.Burnett@va.gov>
Sent: Tuesday, October 18, 2022 12:06 PM
To: rrich@coushatta.org; Read, Patrick R. (CFM); Bennett, Alec (CFM)
Cc: Glucksman Andrew; Samantha H. Grabelle
Subject: *EXTERNAL* Subject: Initiation of Section 106 Consultation Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197
Attachments: SIGNED Template Letter VA OCFM - Gainesville VAMC - Section 106 - Coushatta Tribe of Louisiana.pdf

Dear Mr. Cernek,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is sending the attached letter to initiate consultation with the Coushatta Tribe of Louisiana for the referenced undertaking at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197.

Please confirm receipt of this email.

The VA looks forward to receiving your response.

Thank you,

Ed Burnett
Chief, Facilities Management Service
North Florida/South Georgia Veterans Health System
Office: (352) 548-6000 Ext. 106927
Cell: (352) 233-6033

From: Burnett, Edwin J. <Edwin.Burnett@va.gov>
Sent: Tuesday, October 18, 2022 12:33 PM
To: marlap@miccosukeetribe.com; Read, Patrick R. (CFM); Bennett, Alec (CFM)
Cc: Glucksman Andrew; Samantha H. Grabelle
Subject: *EXTERNAL* Initiation of Section 106 Consultation Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197
Attachments: SIGNED Template Letter VA OCFM - Gainesville VAMC - Section 106 - Miccosukee Tribe of Indians of Florida w attachment.pdf

Dear Mr. Cypress,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is sending the attached letter to initiate consultation with the Miccosukee Tribe of Indians of Florida for the referenced undertaking at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197.

Please confirm receipt of this email.

The VA looks forward to receiving your response.

Thank you,

Ed Burnett
Chief, Facilities Management Service
North Florida/South Georgia Veterans Health System
Office: (352) 548-6000 Ext. 106927
Cell: (352) 233-6033

From: Burnett, Edwin J. <Edwin.Burnett@va.gov>
Sent: Tuesday, October 18, 2022 12:38 PM
To: dhill@mcn-nsn.gov; Read, Patrick R. (CFM); Bennett, Alec (CFM)
Cc: Glucksman Andrew; Samantha H. Grabelle
Subject: *EXTERNAL* Initiation of Section 106 Consultation Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197
Attachments: SIGNED Template Letter VA OCFM - Gainesville VAMC - Section 106 - Muscogee (Creek) Nation w attachment.pdf

Dear Mr. Hill,

The U.S. Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), is sending the attached letter to initiate consultation with the Muscogee (Creek) Nation for the referenced undertaking at the Malcom Randall Veterans Affairs Medical Center (MRVAMC), 1601 S.W. Archer Road, Gainesville, FL 32608-1197.

Please confirm receipt of this email.

The VA looks forward to receiving your response.

Thank you,

Ed Burnett
Chief, Facilities Management Service
North Florida/South Georgia Veterans Health System
Office: (352) 548-6000 Ext. 106927
Cell: (352) 233-6033

APPENDIX B

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Florida Ecological Services Field Office
1339 20th Street
Vero Beach, FL 32960-3559
Phone: (772) 562-3909 Fax: (772) 562-4288
Email Address: fw4flesregs@fws.gov
https://www.fws.gov/office/florida-ecological-services

In Reply Refer To: January 31, 2023
Project Code: 2023-0039975
Project Name: Malcom Randall VA Medical Center

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. **Please include your Project Code, listed at the top of this letter, in all subsequent correspondence regarding this project.** Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see https://www.fws.gov/birds/policies-and-regulations.php.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of

this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Migratory Birds
- Wetlands

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Florida Ecological Services Field Office
1339 20th Street
Vero Beach, FL 32960-3559
(772) 562-3909

Project Summary

Project Code: 2023-0039975
Project Name: Malcom Randall VA Medical Center
Project Type: New Constr - Above Ground
Project Description: 1601 SW Archer Rd, Gainesville, FL 32608
Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@29.636809,-82.34528502735847,14z

Counties: Alachua County, Florida

Endangered Species Act Species

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Birds

NAME	STATUS
Eastern Black Rail *Laterallus jamaicensis ssp. jamaicensis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10477	Threatened
Red-cockaded Woodpecker *Picoides borealis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7614	Endangered

Reptiles

NAME	STATUS
Eastern Indigo Snake *Drymarchon couperi* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/646	Threatened

Insects

NAME	STATUS
Monarch Butterfly *Danaus plexippus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

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1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Kestrel *Falco sparverius paulus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9587	Breeds Apr 1 to Aug 31
American Oystercatcher *Haematopus palliatus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8935	Breeds Apr 15 to Aug 31

NAME	BREEDING SEASON
Bachman's Sparrow *Aimophila aestivalis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6177	Breeds May 1 to Sep 30
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Sep 1 to Jul 31
Black Skimmer *Rynchops niger* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5234	Breeds May 20 to Sep 15
Chimney Swift *Chaetura pelagica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
Great Blue Heron *Ardea herodias occidentalis* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Jan 1 to Dec 31
Gull-billed Tern *Gelochelidon nilotica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9501	Breeds May 1 to Jul 31
Henslow's Sparrow *Ammodramus henslowii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3941	Breeds elsewhere
King Rail *Rallus elegans* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8936	Breeds May 1 to Sep 5
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Magnificent Frigatebird *Fregata magnificens* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Oct 1 to Apr 30
Painted Bunting *Passerina ciris* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Apr 25 to Aug 15

NAME	BREEDING SEASON
Prairie Warbler *Dendroica discolor* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Ruddy Turnstone *Arenaria interpres morinella* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Short-billed Dowitcher *Limnodromus griseus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Swallow-tailed Kite *Elanoides forficatus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8938	Breeds Mar 10 to Jun 30
Willet *Tringa semipalmata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 5

Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

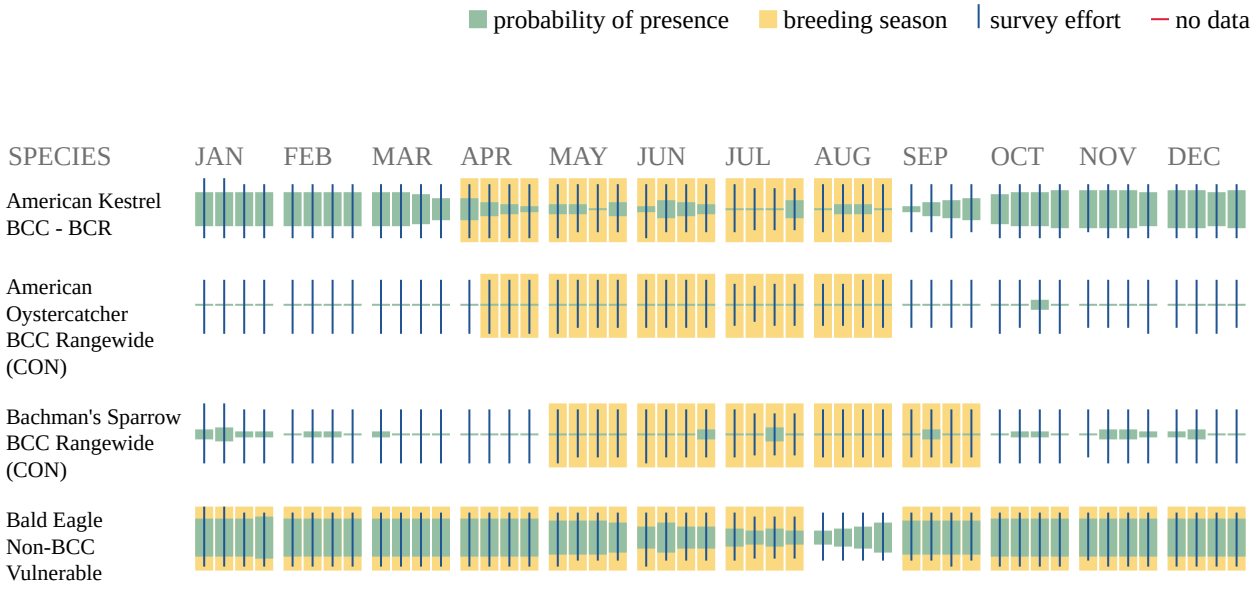
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

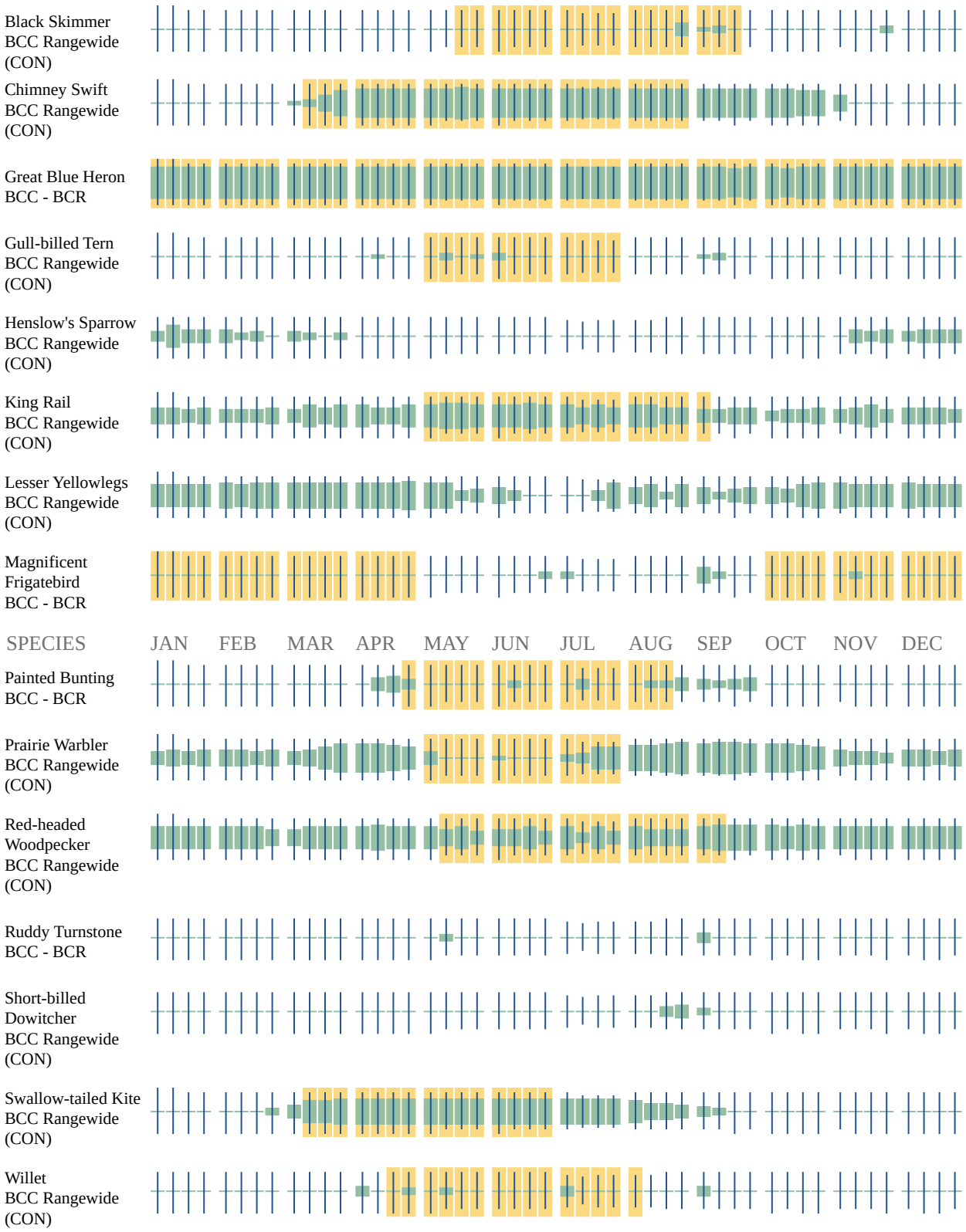
Breeding Season (■)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.




Black Skimmer BCC Rangewide (CON)
Chimney Swift BCC Rangewide (CON)
Great Blue Heron BCC - BCR
Gull-billed Tern BCC Rangewide (CON)
Henslow's Sparrow BCC Rangewide (CON)
King Rail BCC Rangewide (CON)
Lesser Yellowlegs BCC Rangewide (CON)
Magnificent Frigatebird BCC - BCR
SPECIES
JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC
Painted Bunting BCC - BCR
Prairie Warbler BCC Rangewide (CON)
Red-headed Woodpecker BCC Rangewide (CON)
Ruddy Turnstone BCC - BCR
Short-billed Dowitcher BCC Rangewide (CON)
Swallow-tailed Kite BCC Rangewide (CON)
Willet BCC Rangewide (CON)

Additional information can be found using the following links:

- Birds of Conservation Concern https://www.fws.gov/program/migratory-birds/species
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and

how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?
To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?
Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects
For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?
If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Wetlands

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPaC User Contact Information

Agency:	Department of Veterans Affairs
Name:	andrew glucksman
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Address Line 2:	Suite 200
City:	NORTH SMITHFIELD
State:	RI
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Phone:	7812756050

U.S. Fish and Wildlife Service
National Wetlands Inventory

Gainesville VAMC Wetlands Map

February 11, 2022

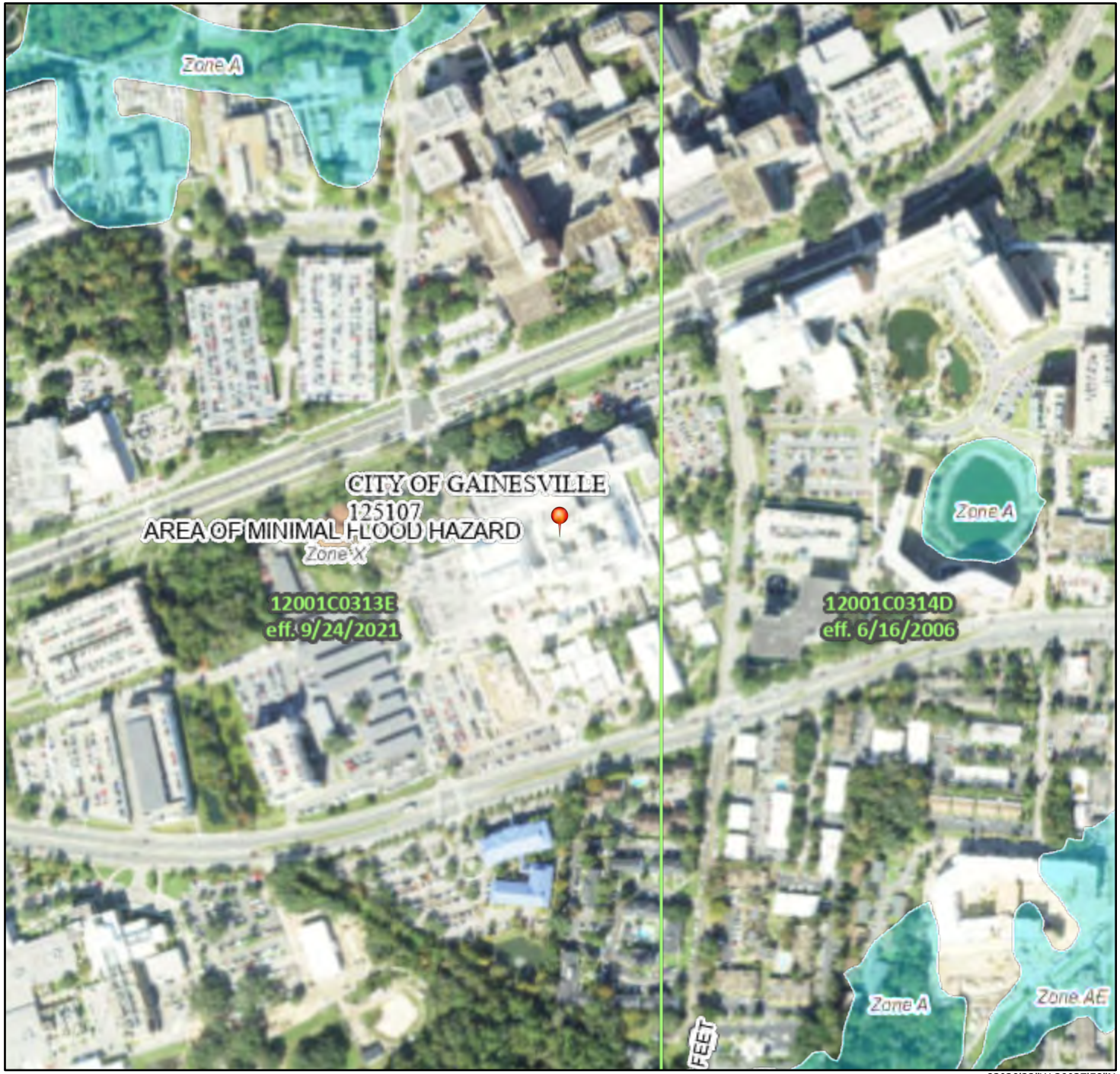
Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

National Flood Hazard Layer FIRMette

FEMA

82°21'W 29°38'29"N



82°20'22"W 29°37'58"N

Feet

0 250 500 1,000 1,500 2,000

1:6,000

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 2/11/2022 at 12:41 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

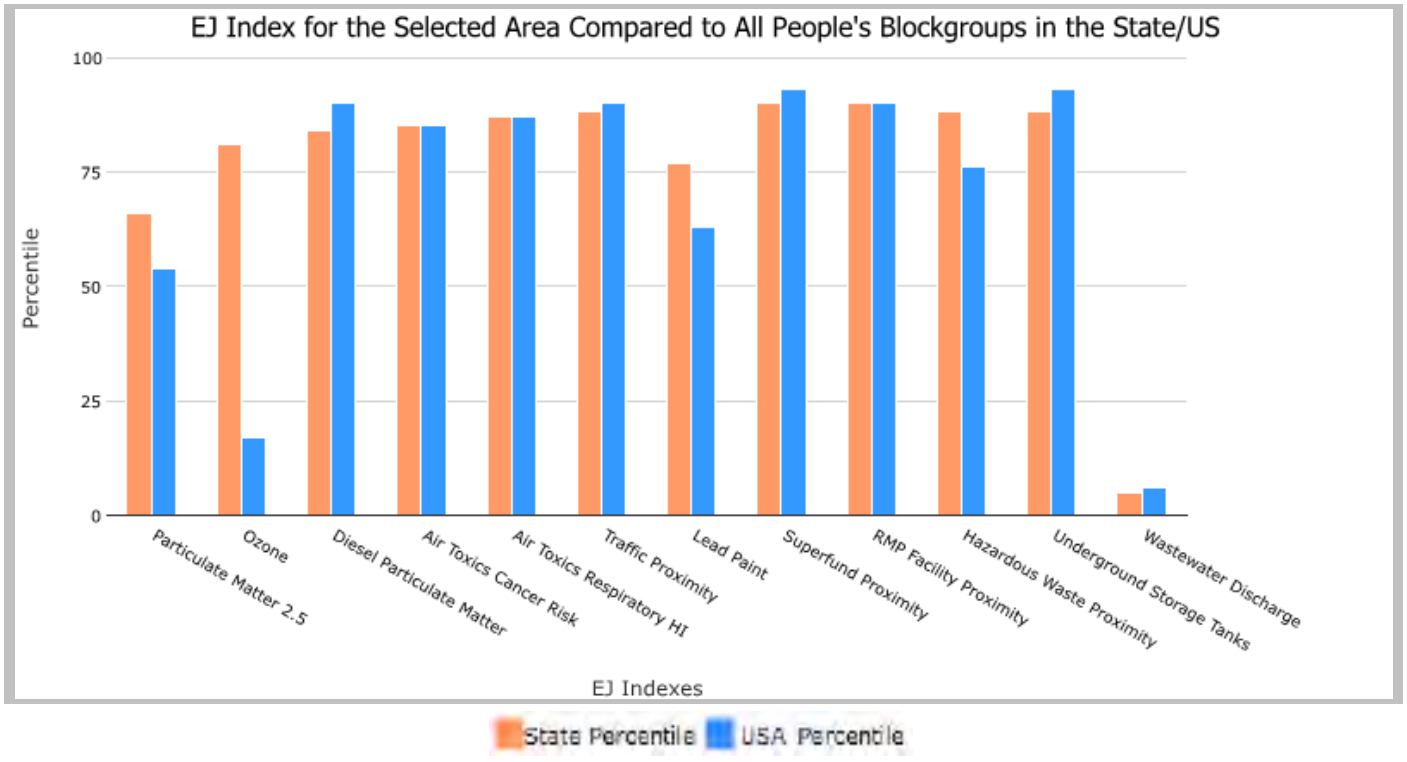
EJScreen Report (Version 2.1)

1 mile Ring Centered at 29.637183,-82.344697, FLORIDA, EPA Region 4

Approximate Population: 18,235

Input Area (sq. miles): 3.14

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	66	54
EJ Index for Ozone	81	17
EJ Index for Diesel Particulate Matter*	84	90
EJ Index for Air Toxics Cancer Risk*	85	85
EJ Index for Air Toxics Respiratory HI*	87	87
EJ Index for Traffic Proximity	88	90
EJ Index for Lead Paint	77	63
EJ Index for Superfund Proximity	90	93
EJ Index for RMP Facility Proximity	90	90
EJ Index for Hazardous Waste Proximity	88	76
EJ Index for Underground Storage Tanks	88	93
EJ Index for Wastewater Discharge	5	6



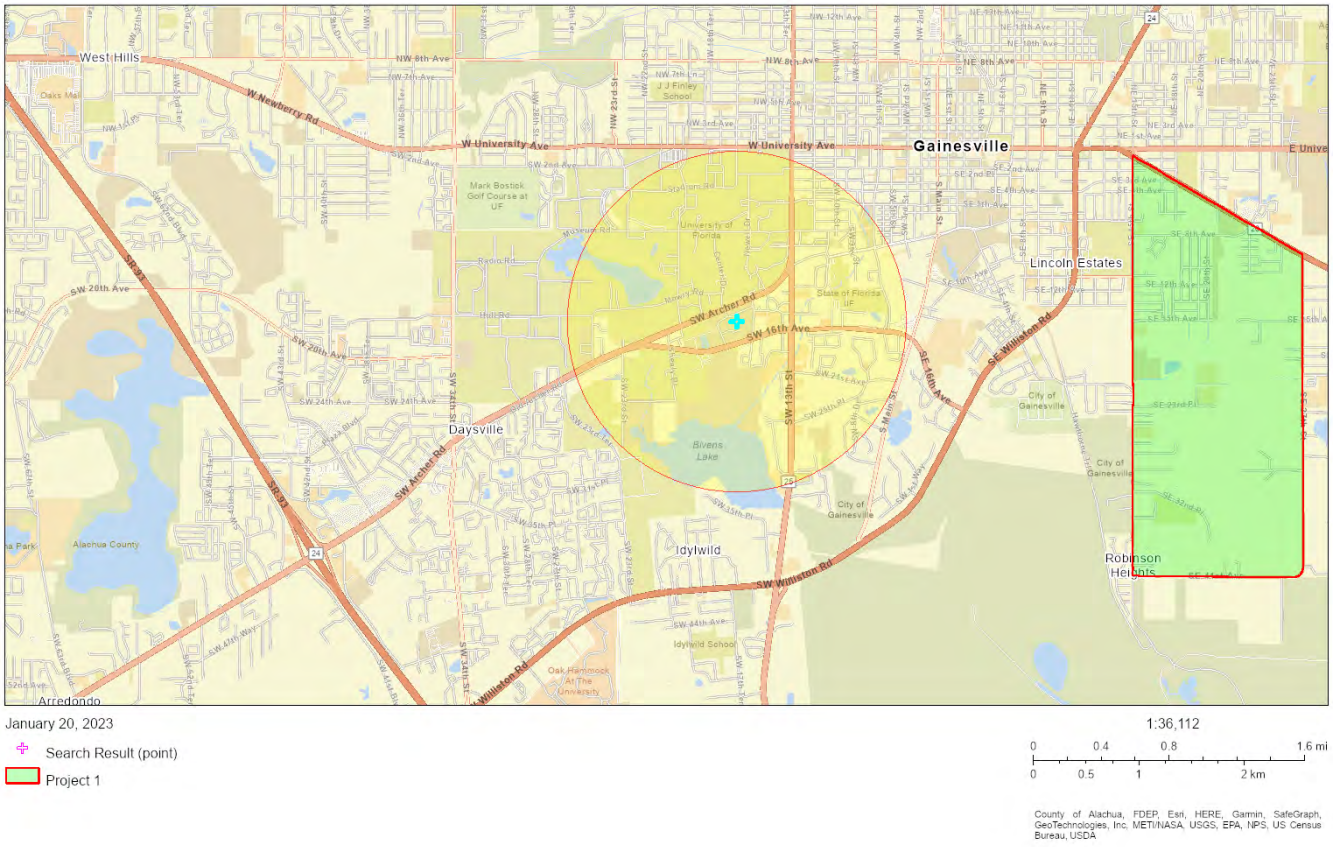
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

EJScreen Report (Version 2.1)

1 mile Ring Centered at 29.637183,-82.344697, FLORIDA, EPA Region 4

Approximate Population: 18,235

Input Area (sq. miles): 3.14



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

1 mile Ring Centered at 29.637183,-82.344697, FLORIDA, EPA Region 4

Approximate Population: 18,235

Input Area (sq. miles): 3.14

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 (µg/m^3)	7.54	7.63	39	8.67	22
Ozone (ppb)	32.5	32.7	49	42.5	5
Diesel Particulate Matter* (µg/m^3)	0.443	0.335	75	0.294	80-90th
Air Toxics Cancer Risk* (lifetime risk per million)	30	27	96	28	80-90th
Air Toxics Respiratory HI*	0.4	0.36	92	0.36	80-90th
Traffic Proximity (daily traffic count/distance to road)	1300	690	85	760	85
Lead Paint (% Pre-1960 Housing)	0.089	0.11	63	0.27	33
Superfund Proximity (site count/km distance)	0.25	0.13	89	0.13	89
RMP Facility Proximity (facility count/km distance)	1.5	0.8	83	0.77	84
Hazardous Waste Proximity (facility count/km distance)	0.71	0.53	81	2.2	50
Underground Storage Tanks (count/km^2)	16	7	86	3.9	94
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.26	1.2	89	12	88
Socioeconomic Indicators					
Demographic Index	62%	39%	81	35%	84
People of Color	40%	47%	51	40%	59
Low Income	71%	33%	94	30%	94
Unemployment Rate	6%	5%	66	5%	66
Limited English Speaking Households	7%	7%	71	5%	80
Less Than High School Education	5%	11%	33	12%	35
Under Age 5	2%	5%	27	6%	18
Over Age 64	2%	20%	3	16%	4

*Diesel particular matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

For additional information, see: www.epa.gov/environmentaljustice

TOTAL EMISSIONS FOR CONSTRUCTION OF THE PROPOSED ACTION

Activity	Year	Criteria Pollutant					
		CO	VOC	NOX	SO2	PM10	PM2.5
		Emissions (tons per year)					
Phase 1a: Infrastrcuture and MEP Systems (24 months)	2027	0.163	0.021	0.013	0.001	0.005	0.003
	2028	0.163	0.021	0.013	0.001	0.005	0.003
Phase 1b: Parking Garage (24 months)	2028	2.556	0.384	6.153	0.014	0.334	0.319
	2029	1.993	0.301	4.700	0.012	0.254	0.241
Phase 2: ACA and Supporting Building Demolition (9 months)	2029	2.360	0.364	6.124	0.015	0.414	0.322
Phase 3a: New Loop Road (3 months)	2030	0.114	0.021	0.153	0.001	0.009	0.007
Phase 3b: Construct HSA (36 months)	2030	4.128	0.608	8.344	0.024	0.462	0.437
	2031	3.819	0.568	7.641	0.024	0.424	0.399
	2032	2.204	0.314	2.859	0.012	0.178	0.161
Phase 4: Renovation (12 months)	2033	0.44	0.06	0.04	0.00	0.01	0.01
TOTAL PROJECT EMISSIONS		**17.94**	**2.66**	**36.04**	**0.11**	**2.10**	**1.90**
ANNUALIZED AVERAGE TOTAL EMISSIONS (per year, from 2027-2033)		**2.56**	**0.38**	**5.15**	**0.02**	**0.30**	**0.27**
General Conformity *De Minimis* Thresholds[(1)] (40 CFR 93.153(b)(2))		100	100	100	100	100	100

Notes:

1 - Alachua County, Florida is in full attainment for all criteria pollutants as of December 31, 2022. see: https://www3.epa.gov/airquality/greenbook/anayo_fl.html

Paving Assumptions

Item	Value	Unit			source
New roadway, length	3015	feet			final project book
New roadway, width	23	feet			final project book
New roadway, area	69,345	square feet			
Depth of asphalt					https://www.apai.net/Files/content/DesignGuide/Chapter_4B.pdf
asphalt wearing course	2	inches	0.17	feet	
asphalt binder course	4	inches	0.33	feet	
upper asphalt base course	6	inches	0.50	feet	
lower asphalt base course	6	inches	0.50	feet	
TOTAL	**18**	**inches**	**1.50**	**feet**	

Volume of aggregate needed				
Area	69,345	square feet	1.6	acres
Depth	1.50	feet		
Volume (CF)	104,018	cubic feet		
Volume (CYF)	**3,853**	**cubic yards**		

Asphalt Curing VOC Emissions - Construction

Asphalt Curing VOC Emissions - Construction

Account for VOC emissions from the asphalt curing process. The emission factor is based on 2.62 lbs of VOCs emitted per acre of pavement and the following equation to determine VOC emissions from asphalt curing (SMAQMD, 1994)

Equation: $\mathbf{TPY_{VOC} = (EF_A \times A)/C1}$

Where:

TPY_{VOC} = tons per year of VOCs emitted

EF_A = Emission factor in lbs VOC/acre = 2.62 lbs VOC/acre

A = Area paved

C1 = Conversion from lbs to tpy (2,000)

For this project:

EFA=	2.62	lbs VOC/acre
A=	1.6	acres
C1=	2000	conversion factor
TPYvoc=	**0.0021**	

On-Road Haul Truck Construction Inputs

Phase 1b: Parking Garage Construct (24 months)			
Construction Material Inputs	**Value:**	**Units:**	**Assumptions:**
Approximate number of pre-cast garage panel deliveries	660	trucks	From: https://cdn.ymaws.com/sites/www.aspenational.org/resource/resmgr/et/2017/May_2017_Tech_Paper.pdf
Roundtrip miles (from supplier to site)	120	miles	Assumes pre-cast concrete manufacturers are located within a 60 miles radius from MRVAMC in North Central Florida
Total miles traveled for Parking Garage Construction	**79,200**	**miles**	

Phase 2: ACA and Supporting Building Demolition (9 months)			
Debris Inputs	**Value:**	**Units:**	**Assumptions:**
Number of buildings to be demolished	7	buildings	Maximum number of all alternatives
Total cubic feet of buildings to be demolished	544,692	cubic feet	Based on building square footage and height
Volume of building demolition debris	6,657	cubic yards	From General Building Debris Estimation Formula (Per FEMA, Debris Estimating Field Guide, FEMA Publication No. 329, September 2010):
Volume of asphalt+base debris to be generated	3,259	cubic yards	Additional debris from pavement removal, excess soil cuttings, and utility tunnel reworking
Volume of typical unsuitable soil debris from grading to be generated	7,185	cubic yards	Additional debris from pavement removal, excess soil cuttings, and utility tunnel reworking
Total volume of debris to be hauled off-site	17,102	cubic yards	Volume of building demo debris+asphalt+unsuitable soil
How many cubic yards does a haul truck trailer hold?	20	cubic yards	Based on a triaxle trailer
How many 20-cubic yard triaxle haul trucks would be needed?	855	trucks	20 CY per haul truck
Roundtrip miles (from site to off-site disposal area)	100	miles	C&D debris to be transported to typical C&D landfill in Raiford, FL or Interlacken, FL
Total miles traveled for derbis haul trucks	**85,509**	**miles**	

Phase 3a: New Loop Road (3 months)			
Construction Material Inputs	**Value:**	**Units:**	**Assumptions:**
Asphalt Roadway - volume of new base and aspahlt materials	3,853	cubic yards	wearing, binder, upper and lower base course
How many cubic yards of material does a truck hold?	20	cubic yards	Volume of material haul truck can deliver to the site
How many trucks would be needed? (with 20% increase factor	231	Truck deliveries	Assumes each truck can deliver 20 cubic yards of material
Roundtrip miles (from supplier to site)	100	miles	Assumes asphalt material suppliers located within a 60 miles radius from MRVAMC in North Central Florida
Total miles traveled for Phase 3 new loop road material delivery trucks	**23,115**	**miles**	

On-Road Haul Truck Construction Inputs

Phase 3: Construction HSA and Supporting Infrastructure (36 months)			
Construction Material Inputs	**Value:**	**Units:**	**Assumptions:**
Approximate square footage of HSA	250,000	gross square feet	From Project Book
Volume of building materials	100,000	cubic feet	Based on 40% of building size
Convert cubic feet to cubic yards of material	3,704	cubic yards	Volume of materials to be delivered to the site
How many cubic yards of material does a truck hold?	20	cubic yards	Volume of material haul truck can deliver to the site
How many trucks would be needed? (with 20% increase factor	222	Truck deliveries	Assumes each truck can deliver 20 cubic yards of material
Roundtrip miles (from supplier to site)	100	miles	Assumes large commerical building suppliers located within a 60 miles radius from MRVAMC in North Central Florida
Total miles traveled for Phase 3 material delivery trucks	**22,222**	**miles**	

Phase 4: Renovation (12 months)			
Debris Inputs	**Value:**	**Units:**	**Assumptions:**
Square footage of renovation area	20,000	gross square feet	Rough order of magnitude
Volume of building materials	8,000	cubic feet	Rough order of magnitude
Cubic yards of material	296	cubic yards	
How many cubic yards does a truck hold?	20	cubic yards per truck	
How many trucks would be needed?	15	trucks	Assumes each truck can deliver 20 cubic yards of material
Roundtrip miles (from supplier to site)	100	miles	Assumes large commerical building suppliers located within a 60 miles radius from MRVAMC in North Central Florida
Total miles traveled for Phase 4 renovation material trucks	**1,481**	**miles**	

Demolition - Volume Inputs

Building	Footprint (sqft)	Height (ft)	Total cubic footage	Debris factor	Total cubic feet of debris	Total cubic yards of debris
ACA	47000	40	107692	0.33	35538.36	1316
40	1500	20	30000	0.33	9900	367
Building M - CUP in MEP wing	11000	25	275000	0.33	90750	3361
29	4500	20	90000	0.33	29700	1100
25	1800	20	36000	0.33	11880	440
T26, 27	600	10	6000	0.33	1980	73
TOTAL			**544,692**		**179,748**	**6,657**

Activity	Area (sqft)	Depth (ft)	Total cubic footage	Debris factor	Total cubic feet of debris	Total cubic yards of debris	Assumptions
Aspahlt Removal	220,000	0.40	88,000	1.00	88,000	3,259	Asphalt parking lot to be removed; all debris to be taken off site for recycling
Grading area	388,000	1.00	388,000	0.50	194,000	7,185	Assumes 50% of soil beneath lot and ACA requires removal

Parking Garage Assumptions

Parking Garage - 5 levels (100 spaces per level) from Project Book

Source:	https://cdn.ymaws.com/sites/www.aspenational.org/resource/resmgr/et/2017/May_2017_Tech_Paper.pdf	
Parking garage 500 spaces		
columns	26	
rows	3	
floors	5	
total prestressed floor panels	390	trucks
double tees	40	trucks (one truck can hold 2 double tees)
stairwells	18	trucks (one truck can hold 2 stairwell sections)
columns	80	trucks
shear wall	12	trucks
spandrel panels	60	trucks
precast inverted t beams	50	trucks
deck drains	10	trucks
TOTAL TRUCKS	660	trucks

Off-Road Heavy Duty Construction Equipment Emissions (MOVES)

			MOVES Emissions in grams/day (June [highest]), for Alachua County, FL										
Activity	Year	Equipment	CO	VOC	NOX	SO2	PM10	PM2.5	CH4	Number of units=	Days in use=	Time variable (not used for MOVES)	C1
Phase 1b: Parking Garage (24 months)	2028	Other Construction Equipment[1]	1248.0	190.0	3459.0	7.0	183.0	178.0	12.0	6	260	1	453.6
	2029	Other Construction Equipment[1]	1105.0	170.0	3137.0	7.0	164.0	159.0	11.0	5	260	1	453.6
Phase 2: ACA and Supporting Building Demolition (9 months)	2029	Other Construction Equipment[1]	1105.0	170.0	3137.0	7.0	164.0	159.0	11.0	8	207	1	453.6
Phase 3a: New Loop Road (3 months)	2030	Paving Equipment[2]	143.0	34.0	587.0	1.0	20.0	20.0	3.0	1	69	1	453.6
Phase 3b: Construct HSA (36 months)	2030	Other Construction Equipment[1]	979.0	153.0	2862.0	7.0	147.0	143.0	10.0	10	260	1	453.6
	2031	Other Construction Equipment[1]	871.0	139.0	2617.0	7.0	134.0	130.0	9.0	10	260	1	453.6
	2032	Other Construction Equipment[1]	773.0	126.0	2382.0	7.0	121.0	118.0	9.0	5	207	1	453.6

Emissions						
CO	VOC	NOX	SO_2	PM10	PM2.5	CH4
4292.0635	653.4392	11896.0317	24.0741	629.3651	612.1693	41.2698
3166.8871	487.2134	8990.5203	20.0617	470.0176	455.6878	31.5256
4034.1270	620.6349	11452.5397	25.5556	598.7302	580.4762	40.1587
21.7526	5.1720	89.2923	0.1521	3.0423	3.0423	0.4563
5611.5520	876.9841	16404.7619	40.1235	842.5926	819.6649	57.3192
4992.5044	796.7372	15000.4409	40.1235	768.0776	745.1499	51.5873
1763.7897	287.5000	5435.1190	15.9722	276.0913	269.2460	20.5357
SUBTOTAL POUNDS FOR ALL PHSAES (2028-2032)						
23882.68	*3727.68*	*69268.71*	*166.06*	*3587.92*	*3485.44*	*242.85*
SUBTOTAL TONS FOR ALL PHSAES (2028-2032)						
11.94	*1.86*	*34.63*	*0.08*	*1.79*	*1.74*	*0.12*
5-YEAR ANNUALIZED AVERAGE TONS (2028-2032)						
2.388	**0.373**	**6.927**	**0.017**	**0.359**	**0.349**	**0.024**

Equation:

Tons per year (TPY_{Pj} = (EF_P x N x D)/C1

Efp = emissions Factor for the given pollutant

N = Number of pieces of equipment

D = Days of use of equipment in a given year

C1 = Conversion from grams to pounds (divide grams by 453.6)

Annualized Average Emissions Per Phase

Phase	CO	VOC	NOX	SO_2	PM10	PM2.5	CH4
Phase 1b: Parking Garage (24 months)	1.8647	0.2852	5.2216	0.0110	0.2748	0.2670	0.0182
Phase 2: ACA and Supporting Building Demolition (9 months)	2.0171	0.3103	5.7263	0.0128	0.2994	0.2902	0.0201
Phase 3a: New Loop Road (3 months)	0.0109	0.0026	0.0446	0.0001	0.0015	0.0015	0.0002
Phase 3b: Construct HSA (36 months)	2.0613	0.3269	6.1401	0.0160	0.3145	0.3057	0.0216

NOTES:

Source: USEPA MOVES 3.0 Software

(1) - Emissions based on category "Other Construction Equipment," a composite of multiple off-road construction equipment. Values are specific to Alachua County, Florida, for the years shown, using June (highest emissions of all month) to represent emissions for each month as a conservative (high) estimate.

(2) - Emissions based on category "Paving Equipment," a composite of typical paving equipment (scraper, paver, tamper, roller, etc.). Values are specific to Alachua County, Florida, for the years shown, using June (highest emissions of all month) to represent emissions for each month as a conservative (high) estimate.

On-Road Heavy Duty Diesel Truck Emissions

Criteria Pollutant:			CO	VOC	NOX	SO2	PM10	PM2.5	CH4
Pounds Per Mile Emission Factors for Heavy Duty Diesel Trucks (33,001 to 60,000 pounds). Assumes all vehicle model years range from 1982 to 2026.			0.0042030	0.0007718	0.0089899	0.0000395	0.0004672	0.0003456	0.0000363
Activity	Year	Miles	Emissions (pounds per activity)						
Phase 1a: Parking Garage (24 months)	2028	39,600.00	166.44	30.56	356.00	1.56	18.50	13.69	1.44
Phase 1a: Parking Garage (24 months)	2029	39,600.00	166.44	30.56	356.00	1.56	18.50	13.69	1.44
Phase 2: ACA and Supporting Building Demolition (9 months)	2029	85,508.96	359.39	65.99	768.72	3.37	39.95	29.56	3.10
Phase 3a: New Loop Road (3 months)	2030	23,115.00	97.15	17.84	207.80	0.91	10.80	7.99	0.84
Phase 3b: Construct HSA (36 months)	2030	7,407.41	31.13	5.72	66.59	0.29	3.46	2.56	0.27
Phase 3b: Construct HSA (36 months)	2031	7,407.41	31.13	5.72	66.59	0.29	3.46	2.56	0.27
Phase 3b: Construct HSA (36 months)	2032	7,407.41	31.13	5.72	66.59	0.29	3.46	2.56	0.27
Phase 4: Renovation (12 months)	2033	1,481.48	6.23	1.14	13.32	0.06	0.69	0.51	0.05
			SUBTOTAL POUNDS (2028-2033)						
			889.04	*163.25*	*1901.61*	*8.35*	*98.82*	*73.11*	*7.68*
			SUBTOTAL TONS (2028-2033)						
			0.444521904	*0.0816264*	*0.950806145*	*0.0041731*	*0.0494099*	*0.03655663*	*0.0038393*
			6-YEAR ANNUALIZED AVERAGE TONS (2028-2033)						
			0.074086984	**0.01360441**	**0.158467691**	**0.00069552**	**0.00823498**	**0.006092771**	**0.00063988**

The on-road emission factors were compiled by running the California Air Resources Board's EMFAC2007 (version 2.3) Burden Model and extracting the **Heavy-Heavy-Duty Diesel Truck (HHDT)** Emission Factors.

These emission factors can be used to calculate on-road mobile source emissions for the vehicle/emission categories listed in the tables below, by use of the following equation:

Emissions (pounds per day) = N x TL x EF

where N = number of trips, TL = trip length (miles/day), and EF = emission factor (pounds per mile)

The **HHDT-DSL** vehicle/emission category accounts for all emissions from heavy-heavy-duty diesel trucks, including start, running and idling exhaust. In addition, ROG emission factors account for diurnal, hot soak, running and resting emissions, and the PM10 & PM2.5 emission factors account for tire and brake wear.

On-Road Worker Passenger Vehicle Emissions

Criteria Pollutant:			CO	VOC	NOX	SO2	PM10	PM2.5	CH4
Pounds Per Mile Emission Factors for Gasoline-Fueled Passenger Vehicles (<8,500 pounds). Assumes all vehicle model years range from 1982 to 2026:			0.00328779	0.00042052	0.00027141	0.00001076	0.00009687	0.00006415	0.00003518
Activity	Year	Miles	Emissions (pounds per activity)						
Phase 1a: Infrastrcuture and MEP Systems (24 months)	2027	99,360.00	326.67	41.78	26.97	1.07	9.63	6.37	3.50
	2028	99,360.00	326.67	41.78	26.97	1.07	9.63	6.37	3.50
Phase 1b: Parking Garage (24 months)	2028	198,720.00	653.35	83.57	53.93	2.14	19.25	12.75	6.99
	2029	198,720.00	653.35	83.57	53.93	2.14	19.25	12.75	6.99
Phase 2: ACA and Supporting Building Demolition (9 months)	2029	99,360.00	326.67	41.78	26.97	1.07	9.63	6.37	3.50
Phase 3a: New Loop Road (3 months)	2030	33,120.00	108.89	13.93	8.99	0.36	3.21	2.12	1.17
Phase 3b: Construct HSA (36 months)	2030	794,880.00	2613.40	334.27	215.74	8.55	77.00	50.99	27.96
	2031	794,880.00	2613.40	334.27	215.74	8.55	77.00	50.99	27.96
	2032	794,880.00	2613.40	334.27	215.74	8.55	77.00	50.99	27.96
Phase 4: Renovation (12 months)	2033	264,960.00	871.13	111.42	71.91	2.85	25.67	17.00	9.32
			SUBTOTAL POUNDS (2027-2033)						
			10453.59	*1337.07*	*862.95*	*34.21*	*308.02*	*203.96*	*111.85*
			SUBTOTAL TONS (2027-2033)						
			5.22679674	*0.668533594*	*0.431476227*	*0.017103132*	*0.154007739*	*0.101982397*	*0.055923265*
			7-YEAR ANNUALIZED AVERAGE TONS (2027-2033)						
			0.746685249	**0.095504799**	**0.061639461**	**0.002443305**	**0.022001106**	**0.014568914**	**0.007989038**

The following emission factors were compiled by running the California Air Resources Board's EMFAC2007 (version 2.3) Burden Model, taking the weighted average of vehicle types:

Passenger Vehicles

These emission factors can be used to calculate on-road mobile source emissions for the vehicle categories listed in the tables below, by use of the following equation:

Emissions (pounds per day) = N x TL x EF

where N = number of trips, TL = trip length (miles/day), and EF = emission factor (pounds per mile)

All the emission factors account for the emissions from start, running and idling exhaust. In addition, the ROG emission factors include diurnal, hot soak, running and resting emissions, and the PM10 & PM2.5 emission factors include tire and brake wear.

Worker Miles Traveled Inputs

Activity	Year	Number of Workers per Day for this Activity	Days Worked Per Month	Number of Months Worked per Year	Miles Driven per Vehicle, Round Trip	Commuting Factor	TOTAL MILES
Phase 1a - Infrastructure and	2027	20	23	9	40	0.6	99,360
MEP Systems	2028	20	23	9	40	0.6	99,360
Phase 1b - Parking Garage	2028	30	23	12	40	0.6	198,720
	2029	30	23	12	40	0.6	198,720
Phase 2 - ACA and Supporting Building Demolition	2029	60	23	3	40	0.6	99,360
Phase 3a - Loop Road Construction	2030	20	23	3	40	0.6	33,120
Phase 3b - ACA Construction	2030	120	23	12	40	0.6	794,880
	2031	120	23	12	40	0.6	794,880
	2032	120	23	12	40	0.6	794,880
Phase 4 - Renovations	2033	40	23	12	40	0.6	264,960
SUM		**580**	**230**	**96**	**400**	**0.6**	**3,378,240**

Fugitive Dust Emissions

$E_{10} = (acres \times EF \times CF \times PM_{10}) / C$

$E_{2.5} = E10 \times PM_{2.5}$

$E_{total} = E_{10} + E_{2.5}$

Acres	EF	CF	PM10	PM2.5	C
10.0	80	0.5	0.45	0.15	2000

E_{10}	0.09
$E_{2.5}$	0.0135
E_{total} (tons/year)	**0.104**

E = Tons per year of Particulate Matter (sum of E10 and E2.5)

Acres = Number of acres to be cleared

EF = 80 lb Total Suspended Particles/acre

TSP = Total Suspended Particulates

CF = Capture Fraction

CF = 0.5 (50% of emissions captured)

PM = Particulate matter; specific for PM_{10} and $PM_{2.5}$

PM_{10} = 0.45 lb/TSP

$PM_{2.5}$ = 0.15 lb/ PM_{10} lb

C = Conversion from lbs to tpy (2,000)

E10= PM10 Emissions

E2.5= PM2.5 Emissions

APPENDIX C

LOCALiQ
The Gainesville Sun | The Ledger
Daily Commercial | Ocala StarBanner
News Chief | Herald-Tribune

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STATE OF FLORIDA, COUNTY OF ALACHUA

Before the undersigned authority personally appeared said legal clerk, who on oath says that he or she is of the legal clerk of the Gainesville Sun, a newspaper published at Gainesville in Alachua County, Florida; that the attached copy of advertisement, being a in the matter of in the Court, was published in said newspaper in the issues dated or by publication on the newspaper's website, if authorized, on:

08/05/2022, 08/07/2022

and that the fees charged are legal. Affiant further says that the Gainesville Sun is a newspaper published at Gainesville, in Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said County, Florida, each and has been entered as periodicals matter at the post office in Gainesville, in Alachua County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that he or she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before on 08/07/2022

Legal Clerk

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PUBLIC NOTICE
SCOPING FOR AN ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF VETERANS AFFAIRS
Malcom Randall Veterans Affairs Medical Center
North Florida/South Georgia Veterans Health Care System
Gainesville, FL

The U.S. Department of Veterans Affairs (VA) requests scoping input for the preparation of a Draft Environmental Assessment (EA) for the Proposed Action to demolish the existing Ambulatory Care Addition (ACA) and replace it with a new ACA (~249,000 building gross square feet) as well as a new 500-space parking garage to account for the loss of existing surface parking as a result of the construction. The Malcom Randall Veterans Affairs Medical Center (MRVAMC) is located at 1601 SW Archer Road, Gainesville, FL 32608-1197. The purpose of the Proposed Action is to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies. Project details are available in the scoping notice at https://www.cfm.va.gov/environmental.

If you have comments on the scope of issues for analysis or information relevant to the Proposed Action, please submit your comments via email within 30 days following publication of this notice to vacoenvironment@va.gov with the subject line "Malcom Randall VAMC Correction of Ambulatory Care Draft EA."

VA will address and incorporate relevant comments in the Draft EA. Once VA completes the Draft EA, it will be published and made available for a 30-day public review and comment period. VA will announce the start of this review period by publishing a notice of availability (NOA) of the Draft EA in The Gainesville Sun. The NOA will include instructions on how to submit comments. The Draft EA will be available for review in print at the Alachua County Library District Headquarters at 401 East University Ave., Gainesville, FL 32601 and electronically via download from the VA website at https://www.cfm.va.gov/environmental.

Aug 5, 7, 2022 #7604540

The Gainesville Sun

Public Notices

Originally published at gainesville.com on 08/05/2022

PUBLIC NOTICE
SCOPING FOR AN
ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF
VETERANS AFFAIRS
Malcom Randall Veterans Affairs Medical Center
North Florida/South Georgia
Veterans Health Care System
Gainesville, FL

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The Gainesville Sun

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ENVIRONMENTAL ASSESSMENT
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VETERANS AFFAIRS
Malcom Randall Veterans Affairs Medical Center
North Florida/South Georgia
Veterans Health Care System
Gainesville, FL

The U.S. Department of Veterans Affairs (VA) requests scoping input for the preparation of a Draft Environmental Assessment (EA) for the Proposed Action to demolish the existing Ambulatory Care Addition (ACA) and replace it with a new ACA (~249,000 building gross square feet) as well as a new 500-space parking garage to account for the loss of existing surface parking as a result of the construction. The Malcom Randall Veterans Affairs Medical Center (MRVAMC) is located at 1601 SW Archer Road, Gainesville, FL 32608-1197. The purpose of the Proposed Action is to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies. Project details are available in the scoping notice at https://www.cfm.va.gov/environmental.

If you have comments on the scope of issues for analysis or information relevant to the Proposed Action, please submit your comments via email within 30 days following publication of this notice to vacoenvironment@va.gov with the subject line “Malcom Randall VAMC Correction of Ambulatory Care Draft EA.”

VA will address and incorporate relevant comments in the Draft EA. Once VA completes the Draft EA, it will be published and made available for a 30-day public review and comment period. VA will announce the start of this review period by publishing a notice of availability (NOA) of the Draft EA in The Gainesville Sun. The NOA will include instructions on how to submit comments. The Draft EA will be available for review in print at the Alachua County Library District Headquarters at 401 East University Ave., Gainesville, FL 32601 and electronically via download from the VA website at https://www.cfm.va.gov/environmental.

Aug 5, 7, 2022 #7604540

NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF VETERANS AFFAIRS
CORRECT NON-COMPLIANT SURGICAL, EMERGENCY, PHARMACY, AND STERILE PROCESSING AT THE MALCOM RANDALL VETERANS AFFAIRS MEDICAL CENTER
NORTH FLORIDA/SOUTH GEORGIA VETERANS HEALTH CARE SYSTEM
GAINESVILLE, FL

The U.S Department of Veterans Affairs (VA) herby gives Notice of Availability (NOA) of the Draft Environmental Assessment (EA) for the Proposed Action to demolish the Ambulatory Care Addition (ACA) and construct a new Hospital Services Addition (HSA) at the Malcom Randall Veterans Affairs Medical Center (MRVAMC) located at 1601 S.W. Archer Road, Gainesville, Alachua County, FL. The Proposed Action is needed to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies. The Proposed Action is needed to bring the MRVAMC services into compliance with current facility codes and standard of care practices and to provide the standard of care to Veterans in North Florida and South Georgia required to meet current and future VA strategic goals.

The Draft EA was prepared according to 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] Parts 1500-1508), and VA's NEPA implementing regulations (38 CFR Part 26).

The Draft EA is available for review via the VA website at https://www.cfm.va.gov/environmental and in print at the Alachua County Library District Headquarters (401 East University Ave., Gainesville, FL).

The review period for the Draft EA will close 30 days from the publication of this notice. Comments or questions may be sent during this review period to vacoenvironment@va.gov. Please use the subject line "Malcom Randall VAMC Draft EA" in your correspondence.

Relevant comments received during the Draft EA 30-day review period will be documented and addressed in the Final EA.