
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
DEPARTMENT OF VETERANS AFFAIRS
PROPOSED ACQUISITION OF LAND FOR THE CONSTRUCTION AND OPERATION OF SURFACE
PARKING LOTS AND PROPOSED MODIFICATION OF KIRMAN AVENUE
VA SIERRA NEVADA HEALTHCARE SYSTEM
975 KIRMAN AVENUE
RENO, WASHOE COUNTY, NEVADA

Introduction

A Final Environmental Assessment (EA), included herein by reference, was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs (VA's) proposed acquisition of land adjoining the VA Sierra Nevada Healthcare System (VASNHCS) campus located at 975 Kirman Avenue, Reno, Washoe County, Nevada for the construction and operation of surface parking lots and the proposed modification of the section of Kirman Avenue that bisects the VASNHCS campus. Preparation of the EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*).

The **purpose** of the Proposed Action is to provide additional parking capacity in the vicinity of the VASNHCS campus that would help alleviate the current and future projected parking space deficits at the VASNHCS and to improve the safety of VASNHCS patients and staff crossing Kirman Avenue between the eastern and western portions of the campus. The Proposed Action would provide additional surface level parking to help meet the unmet parking needs of Veterans seeking healthcare services at the VASNHCS and medical center staff. The proposed parking lots would also help meet the parking needs of contractors during planned campus construction activities. The Proposed Action would also modify Kirman Avenue to increase safety for patients, staff, and visitors who cross Kirman Avenue from the primary parking areas to the primary hospital facilities.

This Proposed Action is **needed** to help address the current and projected long-term parking deficiency at the VASNHCS campus and to address pedestrian safety issues for patients, staff, and visitors that are required to cross Kirman Avenue between the eastern and western portions of the campus.

The VASNHCS is land locked on an approximately 12.5-acre campus, which currently supports over 540,000 square feet of patient care, related structures, a two-story parking garage and seven small parking lots. The VASNHCS campus is currently divided into east and west portions by Kirman Avenue with the majority of medical care operations to the west of Kirman Avenue and the majority of support functions and on-campus parking to the east of Kirman Avenue.

From Fiscal Year (FY) 2007 to FY 2014, the number of patients receiving healthcare services at the VASNHCS grew from 25,000 per year to over 35,000 per year (an increase of over 40 percent) and the number of outpatient visits increased from 244,000 per year to 420,000 per year (over 70 percent increase). VA anticipates that Reno area Veterans need for healthcare services and, consequently, VASNHCS's workload will continue to grow in the future.

The VASNHCS campus currently includes approximately 578 VA-owned, on-campus parking spaces provided by the parking garage on the eastern portion of the campus and seven small surface parking lots. A parking demand analysis conducted by VA found that the facility is currently operating under an approximately 580 parking space deficit that is projected to increase for the foreseeable future. The VASNHCS currently relies on street parking in the residential neighborhoods surrounding the campus to overcome the on-campus parking deficiency. This has resulted in overutilization of the residential street parking, traffic congestion, and pedestrian hazards. Planned future VASNHCS projects include the construction of an additional parking structure on the eastern portion of the campus; however, the structure would not fully address the parking deficiency. In addition, the proposed construction activities would temporarily eliminate some existing on-campus parking, which would exacerbate the parking shortfall.

The Proposed Action would provide additional land for the creation of new VA-owned parking, which would partially eliminate the long-term VASNHCS parking deficit and would reduce the parking impacts associated with the planned campus construction activities.

Kirman Avenue is a southbound, two-lane, one-way road with parallel parking on both sides of the street. During each weekday, approximately 3,400 vehicles use the segment of Kirman Avenue that separates the eastern and western portions of the VASNHCS campus. The main curbside drop-off area for the medical center is located along the western side of Kirman Avenue within this segment. Primary parking for the medical center is provided by the parking garage and surface lots located east of Kirman Avenue, requiring patients and staff to cross Kirman Avenue. VA, in conjunction with the City of Reno, has installed a mid-block crosswalk with a flashing beacon to provide safe passage between the parking area and the medical center. However, this section of Kirman Avenue is congested and dangerous to cross, especially for medical center patients, who by their nature, walk more slowly.

The proposed modification of the section of Kirman Avenue that bisects the campus would moderate and control the flow of traffic in this area to improve pedestrian safety.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action is to acquire land adjoining the VASNHCS campus and, due to a shortage of on-campus parking, construct and operate surface parking lots. These new parking lots would be used by VASNHCS staff, Veteran patients, and visitors, who currently park on the streets surrounding the VASNHCS. The parking lots may also be used by contractors during planned construction projects at the VASNHCS.

VA may consider the development of other VASNHCS-related uses on the acquired parcels in the future; however, these potential other uses are not defined at this time and are not included in this Proposed Action. If other VASNHCS-related uses are planned in the future, they would be addressed in a future supplemental NEPA analysis, as applicable, prior to development.

VA's Proposed Action also includes the modification of the section of Kirman Avenue that bisects the VASNHCS campus. Primary parking at the campus is located east of Kirman Avenue and the medical center buildings are located west of Kirman Avenue. VA's proposed modification would provide improved safety for patients and staff crossing Kirman Avenue between the eastern and western portions of the campus.

Alternatives Considered

After identifying the need for additional on-campus parking to accommodate the needs of VASNHCS patients and staff, VA examined the existing campus for the creation of additional on-site parking. The campus is fully developed and space for additional construction is limited. VA considered the construction of a new parking garage in one or more of the existing on-campus parking lots; however, these lots were found to be too small to support an adequately sized structure. In addition, the construction of a parking garage in these areas would limit future planned construction projects at the campus. VA also considered the construction of additional levels on the existing parking structure. However, the existing parking garage is nearing the end of its design life and is not structurally suitable for the construction of additional levels. VA considered demolishing the existing parking structure and replacing it with a new, larger structure. While this would provide additional needed parking capacity, it would result in the temporary loss of approximately 330 parking spaces provided by the current structure during construction, which would greatly exacerbate the current parking shortage. Therefore, this alternative was eliminated. VA also considered the demolition and/or relocation of some of the smaller structures in the southeastern portion of the campus for the construction of a new parking structure. However, this alternative would temporarily eliminate approximately 70 existing parking spaces during construction, which would exacerbate the current parking shortage. Therefore, this alternative was eliminated from further consideration for this Proposed Action. However, VA plans to construct a new parking garage in this area in the future, once the new proposed surface parking lots are established. The new parking garage would be needed because the proposed new parking lots would provide a maximum of 200 new parking spaces, which would not fully address the parking shortage (580 parking spaces).

VA previously leased and operated an off-campus satellite parking lot at Park Lane Mall in an attempt to partially address the on-campus parking deficiency. However, patients and staff elected to park on streets in the vicinity of the campus and walk to their appointments or work in lieu of parking at the satellite parking lot and using the VA-provided free shuttle service to and from the campus. Based on this past experience, VA eliminated off-campus satellite parking options to address the parking shortage.

Through this analysis, VA determined that the acquisition of additional land adjoining the VASNHCS campus for the development of surface parking lots best met its needs for additional VA-owned, on-site parking.

VA initially considered the complete closure of the section of Kirman Avenue that bisects the campus as the most desirable solution to address pedestrian street crossing safety hazards. This option would have eliminated the need to cross Kirman Avenue and would have improved the continuity of the campus, providing VA increased options for possible future campus development and reconfiguration. Building an elevated walkway with stairs over Kirman Avenue was not considered feasible due to the physical limitations of many Veteran patients. In addition, Federal standards do not permit the construction of pedestrian skywalks over public roads due to new security standards. VA also approached the City of Reno with a request to install a pedestrian traffic signal to permit safe crossing between the eastern and western portion of the campus; however, the City of Reno responded that national traffic and pedestrian traffic standards do not justify the installation of a pedestrian traffic signal.

VA approached the City of Reno and local resident groups regarding the possible closure of this portion of Kirman Avenue. The local resident groups expressed concern that the complete closure of this section of Kirman Avenue would worsen already strained traffic conditions in the

VASNHCS area and requested that VA consider other options to improve pedestrian safety. Through additional evaluation and meetings with the City of Reno and local resident groups, VA found that modification of Kirman Avenue to moderate and control traffic flow adjacent to the campus, yet maintaining the flow of through traffic on one lane, would improve pedestrian safety and was supported by area residents and the City of Reno.

The EA examined in-depth two alternatives, the Preferred Action Alternative and the No Action Alternative, defined as follows:

Preferred Action Alternative

VA's Preferred Action Alternative is to acquire up to 11 parcels of residential land (approximately two acres) adjoining to the north and east of the existing VASNHCS campus across East Taylor Street, Kirman Avenue, and Belli Drive for the construction and operation of surface-level parking lots and the reduction of Kirman Avenue to one lane between the eastern and western portions of the VASNHCS campus. The 11 parcels identified for possible acquisition include the following:

- **691/693 East Taylor Street**
- **697/699 East Taylor Street**
- **825/835 Kirman Avenue**
- **700 – 710 East Taylor Street**
- **701 – 735 Belli Drive**
- **765 – 807 Belli Drive**
- **825 – 831 Belli Drive**
- **845 Belli Drive**
- **865 Belli Drive**
- **885 Belli Drive**
- **703 Balzar Circle**

VA would seek to purchase the 11 parcels of land from willing landowners through negotiation. Several of the property owners have expressed interest in selling their land to VA. VA would negotiate to acquire as many of the parcels as voluntarily available and would base the parking lot design on the land acquired. VA estimates that if all 11 parcels were to be acquired, up to 200 parking spaces would be constructed on the acquired land. The land and parking lots would be owned and maintained by VA as part of an expanded VASNHCS campus.

The section of Kirman Avenue between the eastern and western portions of the VASNHCS campus would be modified to moderate and control the flow of traffic adjacent to the campus to improve the safety of VASNHCS Veteran patients, staff, and visitors crossing this section of road. Modifications would include the reduction of the two southbound lanes on this one-way section of road to one southbound lane. The roadway modifications would be designed in coordination with the City of Reno.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented and operations at the VASNHCS campus would continue as currently conducted. Parking at the VASNHCS campus would continue to be deficient. VA would continue to rely on over utilized street parking in the residential neighborhoods surrounding the VASNHCS to overcome the on-campus

parking deficiency, and associated traffic congestion and pedestrian hazards would persist. The proposed acquisition parcels would likely continue in their current residential use. In addition, the section of Kirman Avenue that bisects the campus would not be modified and would remain dangerous to cross for VASNHCS patients, staff and visitors.

The Preferred Action Alternative effectively provides the best combination of adjacent land and close proximity to increase VASNHCS parking and improve pedestrian safety. The Preferred Action Alternative would reduce VA's current and projected parking deficiencies, would reduce VA's reliance on street parking in the adjacent residential neighborhoods, and would improve the safety of VASNHCS patients, staff, and visitors who cross from campus parking facilities east of Kirman Avenue to the medical center buildings west of Kirman Avenue. The No Action Alternative would not reduce the parking deficiency at the VASNHCS, would not enable VA to provide adequate parking to U.S. Veterans and VASNHCS staff, and would not improve pedestrian safety. However, the No Action Alternative was assessed in the EA to provide a comparative baseline analysis, as required under the CEQ Regulations.

2. Environmental Analysis

Based on the analysis contained in the Final EA, VA concludes there would be no significant direct, indirect, or cumulative adverse impact to the local environment or quality of life associated with implementing the Preferred Action Alternative, provided general Best Management Practices (BMPs), management measures, and mitigation measures specified in the EA are implemented. The following summarizes the environmental analysis for each alternative.

Preferred Action Alternative

The Preferred Action Alternative could result in potential significant adverse impacts to cultural resources and transportation, and less-than-significant adverse impacts to aesthetics, air quality, soils and geology, hydrology and water quality, noise, land use, socioeconomics, solid and hazardous materials, parking, utilities, and environmental justice. With the exception of potential cultural resources and transportation impacts, all of these impacts are less-than-significant and will be further reduced through careful implementation of the general BMPs and management measures, and compliance with regulatory requirements.

The Preferred Action Alternative could result in significant adverse effects on cultural resources. Residential structures on six of the eleven parcels proposed for acquisition (700-710 East Taylor Street, 701-735 Belli Drive, 765-807 Belli Drive, 845 Belli Drive, 865 Belli Drive, and 885 Belli Drive) contribute to the National Register of Historic Places (NRHP)-eligible Belli Addition Historic District. The demolition of the homes on these parcels would result in an adverse effect to the historic district by diminishing the number of contributing properties in the district, by altering its southern boundary along Belli Drive, and by eliminating the only multi-story brick multi-unit apartment buildings in the district. In consultation with Nevada State Historic Preservation Office (SHPO), VA will develop a plan to mitigate cultural resource effects associated with the Preferred Action Alternative. The mitigation measures will be formalized in a Memorandum of Agreement (MOA) between VA and SHPO and other interested parties. Compliance with the terms of the MOA will satisfy VA's requirements under Section 106 of the National Historic Preservation Act (NHPA) and will mitigate the adverse effects to cultural resources of the Preferred Action Alternative to acceptable, less-than-significant levels.

The Preferred Action Alternative could also result in significant adverse effects on transportation. The reduction of Kirman Avenue from two southbound lanes to one southbound lane would allow the continued flow of through traffic and is anticipated to result in less traffic impacts than the complete closure of the road. However, the roadway reduction would impact traffic flow in the area of the VASNHCS campus. VA will conduct a traffic impact analysis to evaluate the potential effects of the proposed Kirman Avenue modifications and will work with the City of Reno to design and implement improvements that will mitigate any identified significant adverse effects to acceptable, less-than-significant levels.

No adverse effects to wetlands, floodplains, coastal zones, or community services would be anticipated.

The Preferred Action Alternative will result in significant long-term positive effects to parking conditions at the VASNHCS and on the neighboring streets and to pedestrian safety. The Preferred Action Alternative could also result in potential positive impacts to socioeconomic and environmental justice, and long-term positive impacts to solid and hazardous materials. No health or safety risks to children are anticipated. Safety conditions will improve by reducing street parking and calming traffic on Kirman Avenue.

The EA also examined the potential cumulative effects of implementing the Proposed Action. This analysis found that implementation of the Preferred Action Alternative with the general BMPs, management measures, and mitigation measures specified in the EA would not result in significant adverse cumulative impacts to onsite or regional natural or cultural resources, and would maintain or enhance the socioeconomic environment of the area through long-term provision of additional parking and safe access necessary for Veterans seeking healthcare services at the VASNHCS.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented and no short-term or long-term improvements to parking conditions at the VASNHCS or the safety of VASNHCS patients, staff and visitors crossing Kirman Avenue between the eastern and western portions of the campus would occur. VA's ability to provide sufficient parking to Veterans seeking healthcare services at the VASNHCS and safe access to the medical facilities at the campus would be compromised.

Mitigation

Cultural Resources

The Preferred Action Alternative could cause adverse effects to historic resources. VA has actively engaged with the SHPO and through this consultation, has developed plans to mitigate the adverse effects to less-than-significant levels. If the Preferred Action Alternative is implemented and Site parcels containing structures contributing to the Belli Addition Historic District are acquired, VA will:

- Enter into a formal MOA with the SHPO and other interested parties that defines an appropriate plan to mitigate the adverse cultural resources effects.
- Implement the mitigation plan defined in the MOA.

In addition, implementing BMPs to reduce impacts during construction will further minimize potential impacts to local cultural resources. All contractors involved in site preparation and ground disturbing construction will be advised that all work must stop immediately in the event that archaeological features, artifacts, or remains are discovered during project construction. The construction contractor will immediately cease work until VA, a qualified archaeologist and the SHPO are contacted to properly identify and appropriately treat discovered items in accordance with the MOA and applicable State and Federal law(s).

Transportation

The proposed modifications to Kirman Avenue could result in significant traffic impacts. To identify and mitigate these potential impacts, VA will:

- Conduct a revised traffic impact analysis to evaluate potential traffic impacts associated with the proposed Kirman Avenue modifications and proposed parking lots.
- Work with the City of Reno to design and implement roadway improvements to mitigate any identified potentially significant traffic impacts. Submit Kirman Avenue modification plans at the 30 percent, 60 percent, 90 percent, and 100 percent design completion stages to The City of Reno for approval. Present preliminary and final plans to the Ward 3 Neighborhood Advisory Board and Reno City Council.

In addition, implementing BMPs will minimize the potential impacts on local roadways. As part of the Preferred Action Alternative, transportation impacts will be maintained at acceptable levels through implementation of the following BMPs:

- VA will work with the City of Reno, as applicable and necessary, to identify and implement roadway improvements, such as signalization and turn lanes, to maintain traffic within the region of influence of the parking lots at an acceptable level of service.
- Ensure debris and/or soil is not deposited on local roadways during the construction period.
- Ensure construction activities do not adversely affect traffic flow on local roadways; construction traffic would be timed to avoid peak travel hours.

Management Measures

VA will also implement the following routine management measures and BMPs identified in the Final EA to reduce identified potential adverse effects of the Preferred Action Alternative:

Aesthetics. Comply with the City of Reno Land Development Code (RLDC), to the extent practicable, install focused lighting with baffles, install landscaping and pedestrian-friendly improvements in the design of Kirman Avenue modifications.

Air Quality. Complete predemolition asbestos and lead-based paint (LBP) surveys, remove asbestos-containing materials (ACM) and peeling/damaged LBP from the site buildings prior to demolition, use dust suppressants during demolition, develop and implement a Construction Emissions Mitigation Plan (CEMP) to reduce impacts from fugitive dust and diesel particulate

matter, control fugitive dust emissions during construction, obtain required air quality emissions construction and operation permits (if necessary) from Washoe County Air Quality Management Division (AQMD), and comply with the Washoe County AQMD regulations.

Geology and Soils. Control soil erosion and sedimentation impacts during construction by complying with National Pollutant Discharge Elimination System (NPDES) permit requirements.

Hydrology and Water Quality. Implement BMPs to control construction and operational-related impacts of soil erosion and sedimentation. Include sufficient on-site stormwater management during project design.

Wildlife and Habitat. Replant and landscape with native species, and comply with the City of Reno RLDC to the extent practicable.

Noise. Comply with the City of Reno Noise Ordinance. Minimize noise effects during construction activities.

Socioeconomics. Develop and implement a Relocation Plan for residents, residential tenants, and/or landlords displaced by the Proposed Action.

Solid and Hazardous Materials. Complete predemolition asbestos and LBP surveys, remove ACM and damaged/peeling LBP from the site buildings prior to demolition; further investigate the Site parcels to evaluate for potential heating oil underground storage tanks (USTs) and contamination; empty and remove any identified USTs; remediate any identified impacted soil to the required applicable standards; properly characterize and manage residual impacted soils excavated during redevelopment; and implement construction and operational BMPs to minimize effects and to comply with applicable regulations.

Utilities. Submit Proposed Action design plans to obtain necessary approvals from utility providers.

Environmental Justice. Provide relocation assistance for residents and residential tenants displaced by the Proposed Action.

3. Regulations

The Proposed Action will not violate the NEPA, the CEQ Regulations, 38 CFR Part 26, or other Federal, State, or local environmental regulations. This will be achieved by implementing the mitigation and management measures summarized above.

4. Commitment to Implementation

VA affirms their commitment to implement the Final EA and FONSI in accordance with the NEPA, the CEQ Regulations, and 38 CFR Part 26. Implementation is dependent on funding. VA will ensure that adequate funds are requested in future years' budget(s) to achieve the goals and objectives set forth in the Final EA and this FONSI, and to fund the commitments described above.

5. Agency and Public Involvement

VA has consulted with appropriate Federal, State, and local regulatory agencies, and has attempted to consult with federally recognized Native American Tribes identified as having ancestral ties to the VASNHCS area. This consultation is documented in the Final EA. Concerns expressed by pertinent regulatory agencies and tribes have been addressed in the Final EA.

In addition, VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in the *Reno Gazette-Journal*, on November 21- 23, 2015. The Draft EA was made available for public review at the VASNHCS and the Washoe County Library. In addition, VA held a public meeting at VASNHCS on December 17, 2015 to briefly summarize the Draft EA and receive public comment. Twenty-one people, mostly residents or property owners of the area near the VASNHCS, signed in as attendees at the public meeting. Twelve people provided verbal comments during the meeting. Three people provided written comments via email or on the comment sheet after the meeting. Several of the commenters provided similar comments and many provided multiple comments. Comments included the suggestion of other alternatives to address the parking deficit and pedestrian safety issues at the VASNHCS campus, concern about potential traffic impacts associated with the Preferred Action Alternative, concern that VA would obtain parcels through eminent domain and would close Kirman Avenue entirely (neither is planned), and concern about the economic and aesthetic impacts of the Preferred Action Alternative on the surrounding residential properties. Where applicable, the Final EA was modified to reflect these comments.

6. Finding of No Significant Impact

After careful review of the Final EA, I have concluded that implementation of the Preferred Action Alternative would not generate significant controversy or have a significant impact on the quality of the human or natural environment, provided VA implements the management measures and mitigation measures identified in the Final EA. VA will implement these measures.

Therefore, per the NEPA, the CEQ Regulations, and 38 CFR Part 26, I am signing this FONSI. This analysis fulfills the requirements of the NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared.

Date

2/4/16


Ms. Lisa Howard
VASNHCS Director
Department of Veterans Affairs

