FINAL

ENVIRONMENTAL ASSESSMENT

OF THE PROPOSED RENOVATION
AND MODERNIZATION OF THE

SIERRA NEVADA
VA HEALTHCARE SYSTEM CAMPUS

975 KIRMAN AVENUE
RENO, WASHOE COUNTY, NEVADA

DEPARTMENT OF VETERANS AFFAIRS

VA SIERRA NEVADA HEALTHCARE SYSTEM

975 KIRMAN AVENUE

RENO, NEVADA

PREPARED BY:

TTL Associates, Inc.

SEPTEMBER 28, 2016

ENVIRONMENTAL ASSESSMENT
ABSTRACT

LEAD AGENCY:	Department of Veterans Affairs (VA)
COOPERATING AGENCIES:	None
TITLE OF PROPOSED ACTION:	Proposed Renovation and Modernization of the VA Sierra Nevada Healthcare System Campus
AFFECTED JURISDICTION:	Reno, Washoe County, Nevada
POINT OF CONTACT:	Ms. Arlee Fisher, Facility Planner, VA Sierra Nevada Healthcare System, 975 Kirman Avenue (001), Reno, Nevada 89502-2597; Tel.: (775) 789-6625
PROPONENTS:	Department of Veterans Affairs (VA)

DOCUMENT DESIGNATION: Environmental Assessment (EA)

ABSTRACT: This Environmental Assessment (EA) evaluates the Proposed Action of VA to renovate and modernize the Sierra Nevada VA Healthcare System (VASNHCS) campus located at 975 Kirman Avenue in Reno, Washoe County, Nevada. The Proposed Action is needed because existing facilities are antiquated and inadequately sized to provide the modern delivery of healthcare services needed by Reno area Veterans. These deficiencies are projected to grow in the future as the patient workload for the VASNHCS increases. In addition, the VASNHCS campus does not meet all modern VA design standards and Federal setback and security requirements. This EA discusses two alternatives: (1) *Proposed Action Alternative* – the implementation of various construction and renovation projects to renovate and modernize the existing VASNHCS campus facilities; and (2) the *No Action Alternative*. The EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; and environmental justice. The EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementing the Proposed Action Alternative, provided general best management practices (BMPs) and management measures specified in this EA are implemented. Therefore, this EA concludes that a Finding of No Significant Impact (FONSI) is appropriate, and that an Environmental Impact Statement (EIS) is not required.

EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs (VA's) proposed renovation and modernization of the existing Sierra Nevada VA Healthcare System (VASNHCS) campus located at 975 Kirman Avenue in Reno, Washoe County, Nevada. Preparation of this EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq*.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). This EA has also been prepared in accordance with *VA NEPA Interim Guidance for Projects* dated September 30, 2010.

PROPOSED ACTION

VA's Proposed Action would renovate and modernize the existing VASNHCS campus facilities to meet the current and growing needs of area Veterans. The Proposed Action is needed because existing facilities are antiquated and inadequately sized to provide the modern delivery of healthcare services needed by Reno area Veterans. These deficiencies are projected to grow in the future as the patient workload for the VASNHCS increases. In addition, the VASNHCS campus does not meet all modern VA design standards and Federal safety, setback and security requirements.

Several renovation and modernization projects are proposed for the VASNHCS campus. Those projects included within the Proposed Action include:

- Construction of New Community Living Center Pod 2
- Demolition of Small Eastern Campus Buildings
- Construction of a New Parking Structure
- Installation of New North Campus Backup Power Generators
- Renovation of Ward B3 Space Adjacent to the New Intensive Care Unit
- Renovate and Right-Size Operating Rooms and Operating Room Suite
- Expand and Renovate Magnetic Resonance Imaging Area
- Renovate Sterile Processing Service Area
- Renovate Vacated Primary Care Space for Pharmacy

VA would design and complete the proposed VASNHCS campus renovation and modernization projects in compliance with modern VA design criteria, nationally recognized building codes, and State and local building codes, to the maximum extent practicable. Prior to construction, VA would obtain all applicable Federal, State, and local permits for the proposed construction from appropriate government authorities. VA would incorporate the best management practices (BMPs) and management measures identified in this EA into the design process to ensure potential environmental effects are maintained at less-than-significant levels.

PURPOSE AND NEED

The ***purpose*** of the Proposed Action is to provide modern, adequately-sized VASNHCS healthcare facilities to meet the current and growing future needs of Reno area Veterans and Federal design standards, setbacks and security requirements.

The Proposed Action is ***needed*** because existing VASNHCS campus facilities are antiquated and inadequately sized to provide the modern delivery of healthcare services needed by Reno area Veterans. Existing VASNHCS campus facilities were mostly constructed in the late 1930s and early 1990s, are not designed to modern VA standards, and do not meet the needs of today's Veterans. In addition, Reno area Veteran needs for healthcare services have increased dramatically. From FY 2007 to FY 2014, the number of patients receiving healthcare services at 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). These Veteran patient service deficiencies are projected to grow in the future as the patient workload for the VASNHCS continues to increase. In addition, the existing VASNHCS campus does not meet all modern VA design standards and Federal safety, setback and security requirements.

Over the past several years, VA has made a strong national commitment to provide high quality, accessible healthcare to all former members of the nation's military because of the service they provided to the country. This commitment has resulted in the dramatic increase in VASNHCS workload, budget and staffing. VA projections indicate additional increases in workload for VASNHCS in the future, particularly in outpatient services. It is in consideration of the additional workload projections and the estimated increase in population in the Reno, Nevada area (estimates show a projected population growth in Washoe County of 30 percent between 2014 and 2033) that VA is in the process addressing long term VASNHCS facility needs.

ALTERNATIVES

VA undertook a sequential planning and screening process, seeking reasonable alternatives for the development of a modern, adequately-sized VASNHCS facility in general, and the Proposed Action in specific. After identifying existing onsite capability shortfalls and deficiencies, VA began developing alternatives to support a more modern, adequately-sized VASNHCS facility, Alternatives considered included renovating and reconfiguring the existing VASNHCS facilities, constructing a replacement facility at the current location or some new site in the Reno area, and outsourcing healthcare services to other existing medical facilities in the Reno area.

VA developed a list of screening criteria to guide the alternative review, evaluation, and selection process. These screening criteria included the physical, operational, and location requirements of the VASNHCS facility, as well as land availability, overall project costs, environmental issues, and other factors.

VA then reviewed the possible development alternatives against the screening criteria to determine locations and facilities best suited to meet the purpose of and need for the Proposed Action. Through this analysis, VA concluded that only the renovation and modernization of the current VASNHCS campus met the screening criteria and was reasonable to meet the purpose and need of the Proposed Action.

This EA examines in-depth two alternatives, the Proposed Action Alternative and the No Action Alternative, defined as follows:

Proposed Action Alternative

VA's Proposed Action is the renovation and modernization of existing VASNHCS campus facilities. The following projects are included in the Proposed Action Alternative:

Construction Projects

- Construction of New Community Living Center (CLC) Pod 2
  - Construct a new 2-story, approximately 16,700 square foot (SF) CLC building on the southeast corner of Locust and E. Taylor Streets, which is currently used as a paved VASNHCS, surface-level parking lot

- Demolition of Small Eastern Campus Buildings
  - Demolition of small underutilized support buildings east of Kirman Avenue, including Buildings 15A, 15B, F, K and 138
  - Provides space for master planned expansions

- Construction of a New Parking Structure
  - Construct a new three-level parking garage located at the southeastern corner of the VASNHCS campus that would be accessed via Belli Drive
  - Needed to help address current and projected VASNHCS campus parking deficiency (580 parking spaces)
  - Approximately 320 new parking spaces provided

- Installation of New North Campus Backup Power Generators
  - Backup generators to support the CLC and Specialty Clinic

Renovation Projects

- Renovate Building B3 Space Adjacent to New Intensive Care Unit (ICU)
  - Renovate 5,000 SF of space for improved staff and patient workflow

- Renovate and Right-Size Operating Rooms and Operating Room Suite
  - Renovate existing space to expand Operating Rooms and correct facility condition assessment deficiencies
  - Renovate existing space to construct Operating Room support spaces
  - Small building addition into courtyard area (north) of current Operating Rooms.

- Expand/Renovate Magnetic Resonance Imaging (MRI) Area
  - Renovation of existing MRI Wing area to provide space for new MRI unit, control room, prep and recovery area and other support spaces
  - Small building addition for second MRI area

- Renovate Sterile Processing Service Area
  - Renovate existing space in Building 1D to correct deficiencies.

- Renovate Vacated Primary Care Space for Pharmacy
  - Renovate vacant space in Building 12 to consolidate Pharmacy into one location.

No Action Alternative

Under the No Action Alternative, the renovation and modernization projects included in the Proposed Action would not be implemented and operations at the VASNHCS would continue as currently conducted. This alternative would not allow VA to provide required and necessary medical care to Veterans living within the Reno area. Patients would continue to lack privacy within antiquated facilities; operations would continue under inefficient, inadequate, un-safe, and outdated conditions; and existing medical center space deficiencies would remain and increase in the future. In addition, patients, staff and the community would face continued and increasing parking and safety challenges as on-campus parking space shortages would continue.

While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative is assessed in this EA to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under CEQ Regulations. The No Action Alternative reflects the *status quo*, serving as a standard against which VA can evaluate the effects of the Proposed Action.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The affected environment or the Region of Influence (ROI) of the Proposed Action, the VASNHCS campus and the immediate surrounding area, is discussed in Section 3 of this EA.

The two considered alternatives, the Proposed Action Alternative and the No Action Alternative, are evaluated in this EA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action's ROI. Technical areas evaluated in this EA include:

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

<u>Proposed Action Alternative</u>

The Proposed Action Alternative would result in the impacts identified throughout Section 3. These include less-than-significant adverse impacts to aesthetics, air quality, cultural resources, soils and geology, hydrology and water quality, noise, land use, socioeconomics, solid and hazardous materials, transportation and parking, utilities, and environmental justice. All of these impacts are less-than-significant and would be further reduced through careful coordination and implementation of the general best management practices (BMPs) and management measures,

and compliance with regulatory requirements as identified throughout Section 3 and summarized in Section 5 of this EA.

No adverse effects to wildlife and habitat; wetlands, floodplains, coastal zones, or community services would be anticipated. In addition, no health or safety risks to children are anticipated.

The Proposed Action Alternative would result in significant long-term beneficial socioeconomic impacts by providing improved and modernized healthcare facilities and services to regional Veterans. The Proposed Action Alternative would also result in significant long-term positive effects to parking conditions at the VASNHCS and on the neighboring streets. In addition, the Proposed Action Alternative would provide additional temporary construction jobs in the private sector, thus providing short-term socioeconomic benefit to the area.

The EA also examines the potential cumulative effects of implementing the Proposed Action in consideration of other recently completed and planned projects at the VASNHCS and surrounding area. In addition to the proposed VASNHCS campus renovation and modernization projects included within the Proposed Action, VA is planning the partial demolition of Building 1 and the construction of an approximately 160,000 square foot, 5-story addition to the east of Building 1 to provide expanded outpatient services (Building 1 Seismic Upgrade and Clinical Expansion Project); the acquisition of up to 11 residential parcels adjacent to the north and east of the campus for surface parking; and the reduction of Kirman Avenue to one lane between the eastern and western portions of the campus to improve the safety of patients and staff crossing from parking facilities east of Kirman Avenue to medical center buildings west of Kirman Avenue (Land Acquisition and Kirman Avenue Modification Project). No other non-VA projects are known to be planned for the VASNHCS area.

The other planned VASNHCS projects have been assessed in separate EAs as separate proposed actions; however, the cumulative effects of these other planned projects in conjunction with the planned projects included in this Proposed Action are assessed in this EA.

This analysis finds that implementation of the Proposed Action with the general BMPs and management measures specified in this EA and the mitigation measured specified in the other EAs (cultural resources and traffic), and close and ongoing coordination between VA and the City of Reno and the Nevada State Historic Preservation Office (SHPO), 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 the renovation and modernization of the existing VASNHCS campus facilities to meet the current and growing needs of area Veterans, including the provision of additional on-campus parking to reduce parking on neighboring streets.

No Action Alternative

Under the No Action Alternative, the renovation and modernization projects included in the Proposed Action would not be implemented and operations at the VASNHCS would continue as currently conducted. This alternative would not allow VA to provide required and necessary medical care to Veterans living within the Reno area. Patients would continue to lack privacy within antiquated facilities; operations would continue under inefficient, inadequate, un-safe, and outdated conditions; and existing medical center space deficiencies would remain and increase in the future. In addition, patients, staff and the community would face continued and increasing parking and safety challenges as on-campus parking space shortages would continue.

AGENCY AND PUBLIC INVOLVEMENT

Agencies consulted for this EA include: US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Army Corps of Engineers (USACE); Nevada Division of Environmental Protection (NDEP); Nevada Department of Conservation and Natural Resources (NCDNR); Nevada State Historic Preservation Office (SHPO); Nevada Department of Transportation (NDOT), United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Washoe County Air Quality Management Division (AQMD); Reno Economic Community Development Department (RECDD), Reno Economic Development and Redevelopment Department (REDRD), Reno Department of Public Works (RDPW), and Regional Transportation Commission of Washoe County (RTC). Agency information and comments have been incorporated into this EA. Copies of relevant correspondence can be found in Appendix A.

The following summarizes information provided by the agencies consulted:

- The **US Environmental Protection Agency (USEPA)** Environmental Review Section, in a letter dated October 19, 2015, stated that the Proposed Action appears to be part of the same VASNHCS campus renovation efforts as the Site Acquisition and Kirman Avenue Modification Project and the Building 1 Seismic Upgrading, Renovation, and Expansion Project. USEPA expressed concern that the separate evaluation of these three projects could affect VA's ability to determine if the cumulative impacts of these projects could be significant and recommended that VA evaluate the appropriateness of dividing the three projects. VA decided to complete separate NEPA EAs for these three projects due to the separate timing and funding constraints of these projects. However, VA recognizes that impacts of these projects may overlap and have the potential to be cumulatively significant; therefore, this EA includes a cumulative effects analysis for each resource area (Section 3) that considers all three projects.

  USEPA also stated that the VASNHCS campus vicinity includes low-income populations and the EA should include a full assessment of impacts to communities with environmental justice concerns and should include commitments to the level of mitigation necessary to reduce impacts below the level of significance for this population. USEPA's specific environmental justice concerns related to VA's planned project to acquire up to 11 residential parcels adjacent to the VASNHCS for use as surface parking (Land Acquisition and Kirman Avenue Modification Project), which was addressed in detail in a separate EA. Environmental justice impacts associated with the Proposed Action and cumulative environmental justice impacts are discussed in Section 3.16.

  USEPA recommended that a plan be developed to address the potential impacts from house demolition (including impacts from lead-based paint), project construction (noise, vehicle emissions, dust), routing of construction vehicles, and increased traffic. Air quality, noise, and transportation impacts and management measures are discussed in Sections 3.3, 3.8, and 3.14.

  USEPA stated that the EA should provide a detailed discussion of ambient air conditions (existing conditions), National Ambient Air Quality Standards (NAAQS), criteria pollutant non-attainment areas, potential air quality impacts of the Proposed Action (including cumulative and indirect impacts), and construction-related impacts. Potential air quality impacts and management measures are discussed in Section 3.3.

USEPA noted that the VASNHCS is located in an area designated as non-attainment (serious) for the PM_{10} NAAQS. In addition, USEPA stated the site is located in a maintenance area for carbon monoxide, indicating that general conformity regulations still apply because of its maintenance designation. In December 2015, following the receipt of USEPA's input regarding the Proposed Action, USEPA redesignated the Reno area as attainment (maintenance) for the PM_{10} NAAQS.

USEPA stated that the EA should include an analysis of air quality impacts associated with the Proposed Action, including emission estimates of all criteria pollutants and diesel particulate matter (DPM), disclose the available information about the health risks associated with vehicle emissions and mobile source air toxics, and recommended a Construction Emissions Mitigation Plan (CEMP) for fugitive dust and DPM. Potential air quality impacts and management measures are discussed in Section 3.3.

USEPA recommended that VA use CEQ's December 2014 NEPA Revised Draft Greenhouse Gas (GHG) guidance document (GHG Guidance Document) to help outline the framework for its analysis of GHG emissions associated with the Proposed Action, relevant climate change impacts, reasonable alternatives and/or practicable mitigation measures to reduce project-related GHG emissions, and design of the Proposed Action to incorporate GHG reduction measures and resilience to foreseeable climate change effects. GHG emissions and climate change are discussed in Section 3.3.

The USEPA stated that VA should identify ways to minimize the Proposed Action footprint and reduce impervious surfaces by implementing low-impact development (LID) features that divert runoff from parking areas and roadways into stormwater treatment structures, such as bioretention areas, infiltration trenches or basins, and/or filter strips on-site. Potential erosion and sedimentation and stormwater impacts and management measures are discussed in Sections 3.5 and 3.6.

The USEPA stated that the EA should describe how the project will meet the restoration of native plant and tree species requirements of Executive Order 13112 on Invasive Species and should consider the federal memorandum issued in June 2014 entitled Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators which directs Federal agencies to take steps to protect and restore domestic populations of pollinators. Wildlife and habitat are discussed in Section 3.7.

- According to the **US Fish and Wildlife Service (USFWS), Reno Fish and Wildlife Office (RFWO)**, information pertaining to threatened, endangered, and candidate species and critical habitat can be obtained from the USFWS Information, Planning, and Conservation System (IPAC) internet website. VA reviewed the IPAC website for information regarding the protected species in Washoe County. Based on the lack of natural habitat at the VASNHCS, no protected species identified on the IPAC website are likely to be present. Protected species are discussed in Section 3.7.

- The **Nevada Division of Environmental Protection (NDEP), Bureau of Waste Management (BWM)** indicated that they maintain a Resource Conservation and Recovery Act (RCRA) file for the VASNHCS campus, but provided no input or comment regarding the Proposed Action.

- The **Regional Transportation Commission of Washoe County (RTC)** provided no comments specific to the Proposed Action, but reiterated its previous comments regarding VA's plan to modify the section of Kirman Avenue that bisects the VASNHCS campus. The RTC noted that Kirman Avenue is a regional road and should the road be abandoned (which was being considered by VA at one time, but is no longer under consideration), the regional transportation plan and travel demand model would need to be updated to reflect the change and the bus transit line (Route 13) that serves this area and uses Kirman Avenue would need to be altered. RTC stated that the abandonment of Kirman Avenue (no longer considered by VA) would have clear impacts to transit, but RTC believed that those impacts could be mitigated as long as VA is required to maintain current transit access or create new and better access to the facility. VA plans to modify the section of Kirman Avenue that bisects the campus, but will maintain one of the two current through lanes to allow the continued flow of traffic on the road. The impacts of the planned modification of Kirman Avenue were evaluated in the Proposed Acquisition of Land for the Construction and Operation of Surface Parking Lots and Proposed Modification of Kirman Avenue Final EA dated February 4, 2016. VA will continue to work with the City of Reno to address traffic impacts associated with the modification of Kirman Avenue. Potential traffic impacts and management measures are discussed in Section 3.14.

- In a letter dated October 19, 2015, the **City of Reno** concurred with VA that this EA must evaluate the cumulative effects of all the planned VASNHCS renovation projects. The City of Reno noted that VASNHCS had reported issues with the pedestrian crossing at Kirman Avenue between the eastern and western portions of the campus and that any additions to the east side of the campus (the proposed parking garage) should address this issue. The City of Reno indicated that VA should consider the installation of an elevated pedestrian walkway over Kirman Avenue. (Federal regulations do not permit the construction of pedestrian skywalks over public roads due to new security standards). The City of Reno stated that it was not opposed to the reduction of Kirman Avenue to one lane and described the procedures and requirements for the proposed roadway reduction (addressed in the Proposed Acquisition of Land for the Construction and Operation of Surface Parking Lots and Proposed Modification of Kirman Avenue Final EA dated February 4, 2016). Potential traffic impacts and management measures are discussed in Section 3.14.

Several Federally-recognized Native American Tribes were identified as having possible ancestral ties to the VASNHCS region (listed in Section 10). In addition, SHPO identified two Nevada organizations, Preserve Nevada and Nevada Architectural History Alliance, and requested that VA include these agencies in their consultation. These tribes and organizations were contacted by VA for input regarding the Proposed Action. As of the date of this EA, no responses have been received from the tribes (VA 2016).

VA, as the proponent of the Proposed Action, 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* from August 5, 2016 through August 7, 2016. The Draft EA was also made available for public review at the VASNHCS and the Washoe County Library and was posted on the VASNHCS website. VA received a comment letter from the USEPA, dated September 6, 2016. The USEPA indicated that the Draft EA addressed their concern of the separate NEPA evaluation of the Proposed Action from the Site Acquisition and Kirman Avenue Modification Project and the Building 1 Seismic Upgrading, Renovation and Expansion Project through an analysis of the cumulative effects of each of these projects. However, the USEPA stated that the Draft EA did not appear to have fully addressed the potential for cumulative air

quality impacts and did not discuss the magnitude of other campus renovation projects, primarily the Building 1 Seismic Upgrade and Clinical Expansion Project, and the potential cumulative air quality impacts of the campus renovation projects if they were all implemented concurrently. USEPA recommended that a schedule of the campus renovation projects be discussed in the Final EA and that the Final EA include a quantification and evaluation of air quality emissions, if the campus renovation projects are planned to be implemented concurrently. USEPA stated that if quantification of air quality emissions is not conducted, VA should provide additional support for concluding that cumulative air quality impacts are less than significant. USEPA also stated that should VA establish a construction schedule for the various planned projects to reduce the cumulative air quality impacts to less than significant, the schedule should be included in the Final EA.

USEPA also commended VA for its environmental justice approach for the Land Acquisition Project (only acquiring parcels from willing sellers and providing relocation assistance) and encouraged VA to describe in the Final EA and FONSI the proposed strategy for community outreach, including a description of how VA will determine willing sellers among affected landowners. Details regarding VA's property acquisition, relocation, and community outreach efforts and procedures are included in the Final EA and FONSI for the Land Acquisition and Kirman Avenue Modification Project (February 2016).

The USEPA's comments are included in Appendix D. Where applicable, the Final EA was modified to reflect these comments.

No other public comments were received regarding the Draft EA.

CONCLUSIONS

The analysis performed in this EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementation of the Proposed Action, provided general BMPs and management measures, specified in this EA are implemented. This EA's analysis determines, therefore, that an Environmental Impact Statement (EIS) is unnecessary for implementation of the Proposed Action Alternative, and that a FONSI is appropriate.

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SECTION 1: INTRODUCTION

1.1 Introduction

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs (VA), a Federal agency, proposed renovation and modernization of the VA Sierra Nevada Healthcare System (VASNHCS) campus in Reno, Nevada to meet the current and growing needs of area Veterans. The VASNHCS campus is located at 975 Kirman Avenue in Reno, Washoe County, Nevada. Refer to Figures 1 through 5, which depict the location and features of the VASNHCS campus.

Existing VASNHCS campus facilities, mostly constructed between the late 1930s and early 1990s, are antiquated and inadequately sized to provide the modern delivery of healthcare services currently needed by Reno area Veterans. These deficiencies are projected to grow in the future as the patient workload for the VASNHCS continues to increase. In addition, the VASNHCS campus does not meet all modern Federal setback and security requirements. Through a series of proposed renovation and modernization construction projects, the VASNHCS would renovate and modernize facilities to meet these requirements.

This Introduction section provides the reader with necessary introductory and background information concerning the renovation and modernization of the VASNHCS campus for proper analytical context, identifies the purpose of and need for the Proposed Action, and the Federal decision to made after considering the EA findings. Section 2 provides detailed information regarding the Proposed Action and the alternatives considered by VA. Section 3 describes the existing environmental, cultural, and socioeconomic conditions at the VASNHCS campus and the surrounding area and identifies the potential direct and indirect effects of the Proposed Action. Management measures and mitigation measures (project-specific requirements, not routinely implemented as part of construction projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels), if any, that would be employed to minimize potential adverse effects of the Proposed Action are presented for each resource area in Section 3 and are summarized in Section 5. Section 4 describes the VA public and agency outreach and involvement process for this EA. Section 6 provides the conclusions of this EA, based on the analysis presented in Section 3.

Preparation of this EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq*.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). This EA also has been prepared in accordance with VA's *NEPA Interim Guidance for Projects* (2010).

In accordance with the above NEPA regulations, this EA: allows for public input into the Federal decision-making process; provides Federal decision-makers, before making decisions, with an understanding of potential environmental effects; identifies measures the Federal decision-maker could implement to reduce potential environmental effects; and documents the NEPA process. A summary of public/agency involvement (and key issues identified) is provided in Section 4. Federal, State, and local regulations applicable to the Proposed Action are identified in Section 11.

This EA examines in-depth two alternatives: Renovation and Modernization of the VASNHCS Campus (the Proposed Action Alternative), and the No Action Alternative, defined as follows:

Proposed Action Alternative: Renovation and Modernization of the existing VASNHCS Campus. The following VASNHCS campus proposed renovation and modernization projects are included in the Proposed Action:

Construction Projects:

- Construction of New Community Living Center (CLC) Pod 2. Anticipated to begin in 2022.
- Demolition of Small Eastern Campus Buildings. Anticipated to begin in fall 2017.
- Construction of New Parking Structure. Anticipated to begin in August 2018.
- Installation of New North Campus Backup Power Generators. Anticipated for 2017.

Renovation Projects:

- Renovate Ward B3 Space Adjacent to New Intensive Care Unit (ICU)
- Renovate and Right-Size Operating Rooms and Operating Room Suite
- Expand and Renovate Magnetic Resonance Imaging (MRI) Area
- Renovate Sterile Processing Service Area
- Renovate Vacated Primary Care Space for Pharmacy

Proposed Action construction project locations are illustrated on Figure 6.

No Action Alternative: Do not implement the Proposed Action as identified and continue with operations as currently conducted at the VASNHCS campus.

1.2 Other Planned and Future VASNHCS Campus Projects

In addition to the proposed VASNHCS campus renovation and modernization projects included within this Proposed Action, VA is planning other VASNHCS expansion, renovation and modernization projects. Other planned projects include:

Land Acquisition and Kirman Avenue Modification Project

- Acquisition of up to 11 residential properties adjoining to the north and east of the current VASNHCS campus, across East Taylor Street and Kirman Avenue, for surface level parking (up to 200 parking spaces). Anticipated to be completed for the initial 3 parcels by April 2018. The remaining parcels will be acquired as they become available, anticipated in late 2020.

- Reduction of Kirman Avenue to one lane between western and eastern portions of the VASNHCS campus to connect the two portions of the campus and provide safe patient and staff access from parking facilities east of Kirman Avenue with medical center buildings west of Kirman Avenue. Anticipated to begin in December 2021.

Building 1 Seismic Upgrade and Clinical Expansion Project

- Clinical Expansion Building
  - Construction of a 160,000 SF, 5-story addition to the east of Building 1 to provide expanded outpatient services

- Upgrading and Renovation of Building 1
  - demolition of 50,000 SF of Building 1
  - seismic upgrading of Building 1 to meet current building codes
  - renovation of the remaining 97,000 SF of Building 1 to provide better delivery of services

- Anticipated to begin in spring 2018.

These other planned VASNHCS projects were assessed as separate proposed actions in separate EAs and hence are not analyzed in this EA. However, the cumulative effects of these other planned VASNHCS campus projects in conjunction with the planned projects that are included in this Proposed Action are assessed in this EA throughout Section 3.

VA is also considering additional, future VASNHCS campus renovation and modernization projects, including:

- Additional Community Living Center Space (Pods 1 and 3)

- Either construction of new or renovation of existing space to provide a New Inpatient Mental Health Facility

- Construction of an additional New Parking Structure (to replace existing parking garage with a more permanent structure and with added capacity)

- Construction of New Wellness Center

- Replace Existing Chillers with More Efficient Chillers

- Construct Sanitary Sewer Storage System to Meet Emergency Management Requirement

- Construct Potable Water Storage System to Meet Emergency Management Requirement

Details of these future projects, such as proposed project locations or exact need, have not yet been determined. Therefore, these future projects are not included in this Proposed Action. Should these planned future projects remain viable, and VA justifies and receives Federal (Congressional) funding, additional NEPA analyses of these projects, as appropriate, will be conducted in the future.

1.3 Background

The VASNHCS provides primary and secondary care to a large geographic area that includes 21 counties in northern Nevada and northeastern California. In addition, VA offers regional medical care in four Outpatient Clinics located in Minden and Fallon, Nevada and Auburn and Susanville, California. Additionally, VASNHCS operates a Rural Outreach Clinic in Winnemucca, Nevada, provides offsite primary care services at the VASNHCS East Campus at 1201 Corporate Boulevard, and also operates a Homeless Clinic at 250 Capitol Hill Avenue and an Eye Clinic at 2295 Kietzke Lane, all in Reno, Nevada.

Prior to the late 1930s, the land that the VASNHCS campus currently occupies was unimproved. The construction of Building 1A, located in the central portion of the VASNHCS campus and west of Kirman Avenue, was approved in 1935 and the VA hospital opened in 1939. The area east of Kirman Avenue remained unimproved land until the late 1970s. The VASNHCS campus was expanded from the late 1970s through the early 1990s, including the construction of the current Specialty Clinic, Community Living Center, Dining and Canteen, and Clinical buildings west of Kirman Avenue; and the current Boiler Plant and Laundry buildings, and surface-level parking east of Kirman Avenue. An additional expansion of the VASNHCS campus occurred in the late 1990s with the addition of the Bed Tower, ED Wing, and MRI Wing buildings west of Kirman Avenue; and the Maintenance and Research buildings east of Kirman Avenue.

The VASNHCS campus is land locked on an approximately 12.5-acre area, 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 located west of Kirman Avenue and the majority of support functions and parking located east of Kirman Avenue (Refer to Figures 1 through 5).

In excess of 120,000 Veterans reside within the VASNHCS region, with the City of Reno representing the largest urban area. The VASNHCS campus is the site of the Ioannis A. Lougaris VA Medical Center (VAMC), which operates 56 hospital beds and 60 Transitional Care Unit beds. During Fiscal Year (FY) 2014, VASNHCS provided care to over 35,000 individual patients, which accounted for approximately 420,000 outpatient visits and more than 3,000 inpatients. These numbers represent a dramatic increase since FY 2007, at which time the facility was treating 25,000 individual patients, which resulted in 244,000 outpatient visits and 2,800 inpatients.

Over the past several years, VA has made a strong national commitment to provide high quality, accessible healthcare to all former members of the nation's military because of the service they

provided to the country. This commitment has resulted in the dramatic increase in VASNHCS workload, budget and staffing. VA projections indicate additional increases in workload for VASNHCS in the future, particularly in outpatient services. It is in consideration of the additional workload projections and the estimated increase in population in the Reno, Nevada area (estimates show a projected population growth in Washoe County of 30 percent between 2014 and 2033) that VA is in the process addressing long term VASNHCS facility needs.

Starting in 2010, VA began a multi-year effort to reconfigure the VASNHCS campus to provide for additional and more efficient medical care to Veterans. Specifically, VA is in the process of planning or designing projects that would correct existing shortcomings or increase the capacity of the facility to provide the following services:

- Primary and Specialty Care Services
- Dental Services
- Diagnostic Imaging Services
- Same Day (Outpatient) Surgical Services
- Intensive Care Unit
- Community Living Center
- Eye Clinic Services
- Audiology Services

In addition to positioning the facility to address the projected increases in the above listed areas, VA is also in the process of planning improvements to the VASNHCS campus as a whole to allow enhanced access to the site for all patients and staff, along with improvements to the surrounding neighborhood. These campus improvements would vastly enrich the experience of all patients who come to the facility for healthcare services, while simultaneously enriching the residents in the community immediately surrounding the facility. Planned campus improvements include:

- Construction of parking garages as necessary to provide a sufficient number of onsite parking stalls to meet the demand of patients and staff.
- Construction of a pedestrian mall off the old Locust Street main facility entrance.
- Partial closure of Kirman Avenue where it bisects the facility campus.
- Demolition of old structures and modular buildings on the east side of Kirman Avenue which no longer support the functions of the facility and replacement with new, appropriate permanent structures.

FIGURE 1

REGIONAL LOCATION MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS CAMPUS
RENOVATION AND MODERNIZATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS

TTL PROJECT NO.
12181.03

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Environmental, Geotechnical Engineering & Testing

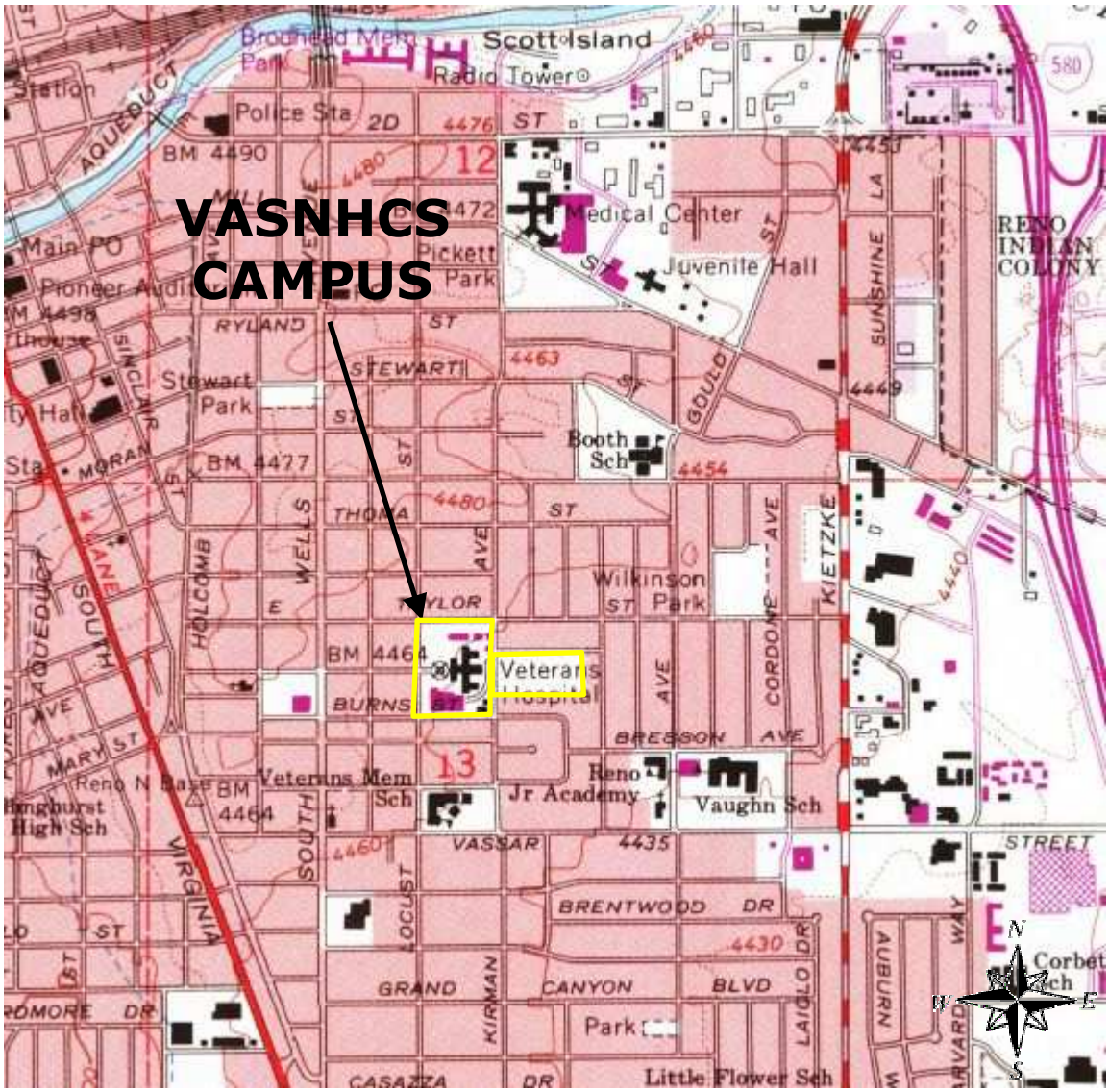

FIGURE 2

VICINITY TOPOGRAPHIC MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS CAMPUS
RENOVATION AND MODERNIZATION
RENO, NEVADA

PREPARED FOR

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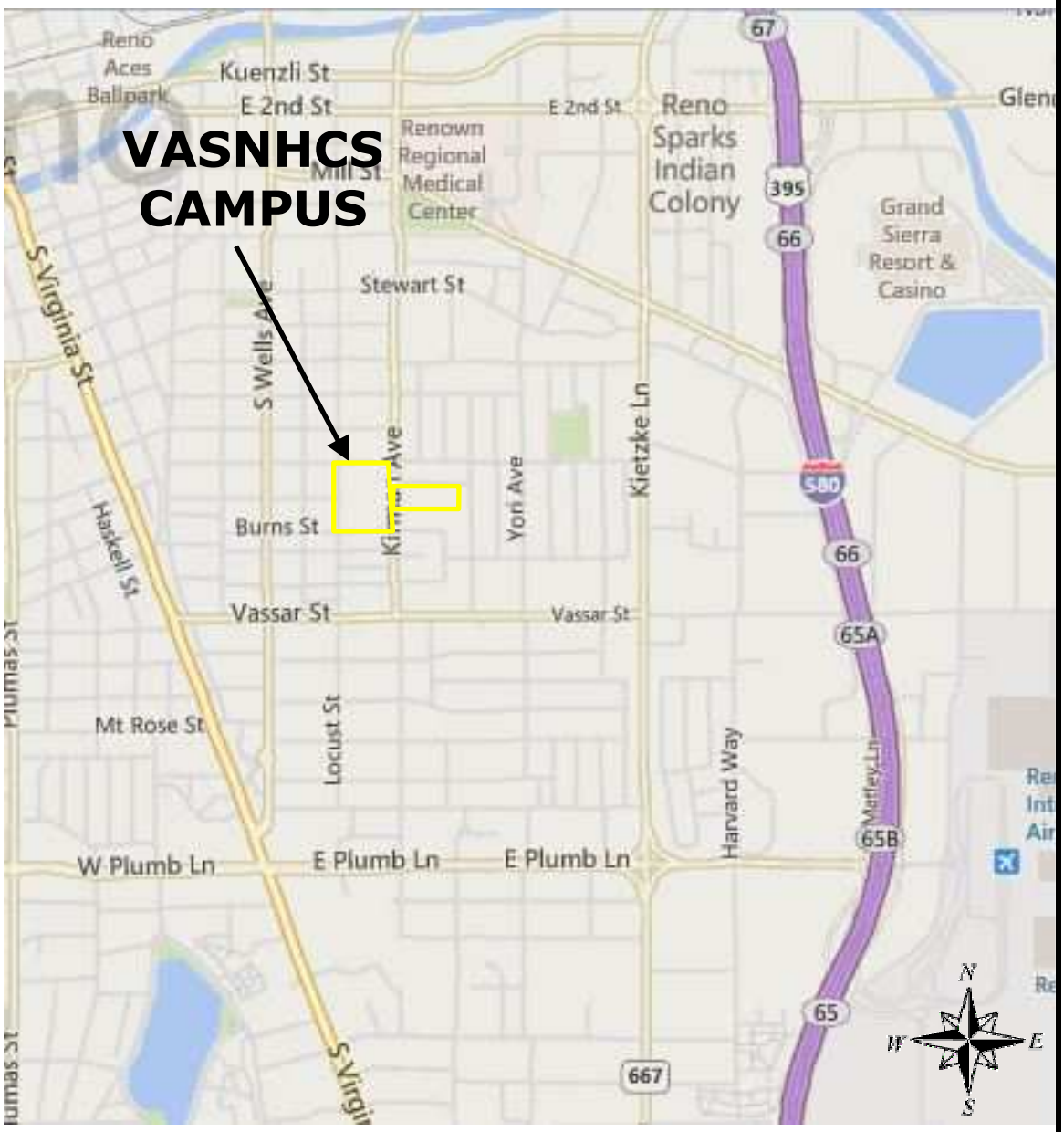

FIGURE 3

VICINITY STREET MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS CAMPUS
RENOVATION AND MODERNIZATION
RENO, NEVADA

PREPARED FOR

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FIGURE 4

2014 AERIAL PHOTOGRAPH

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS CAMPUS
RENOVATION AND MODERNIZATION
RENO, NEVADA

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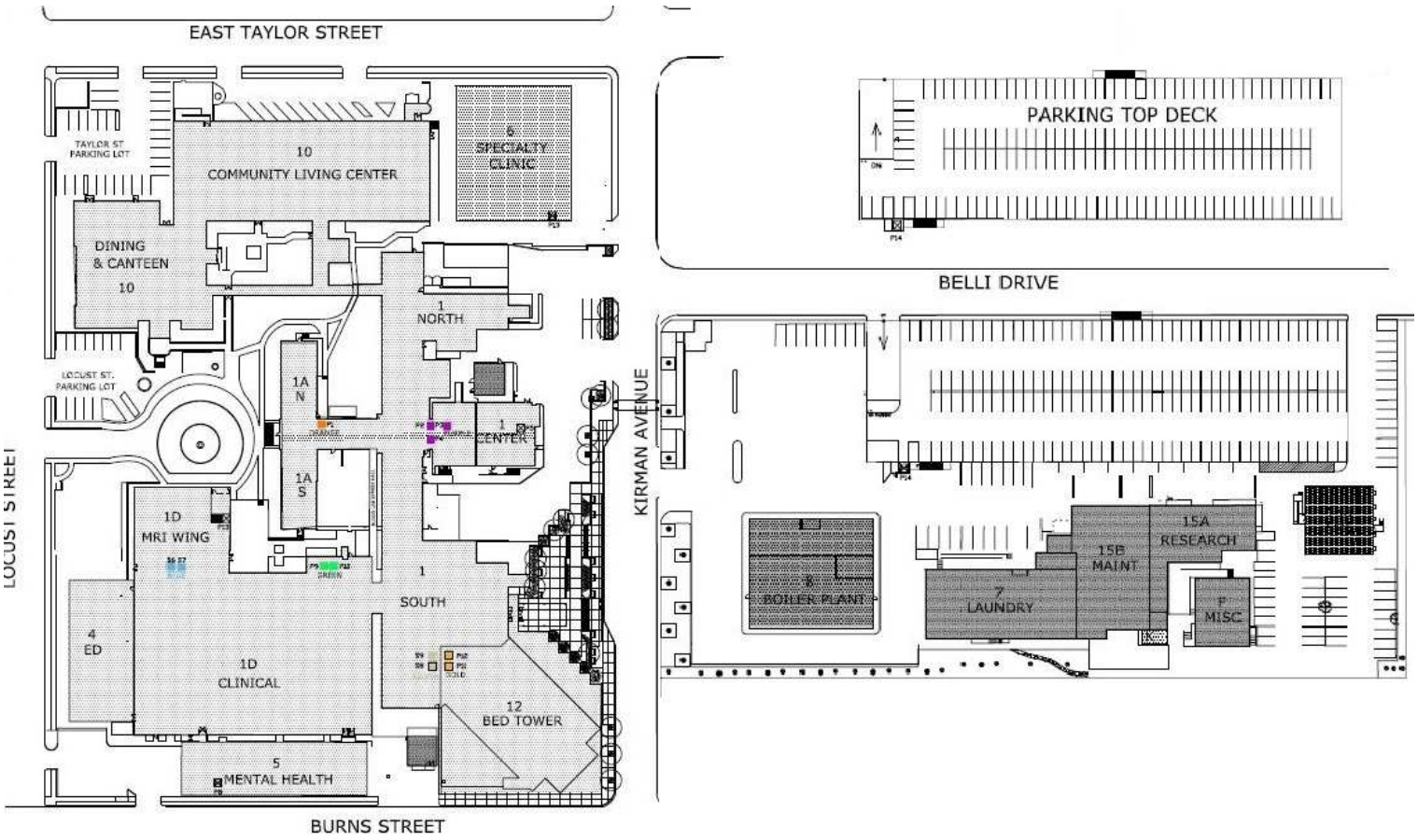

FIGURE 5
VASNHCS CAMPUS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS CAMPUS RENOVATION AND MODERNIZATION
RENO, NEVADA

PREPARED FOR

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12181.03

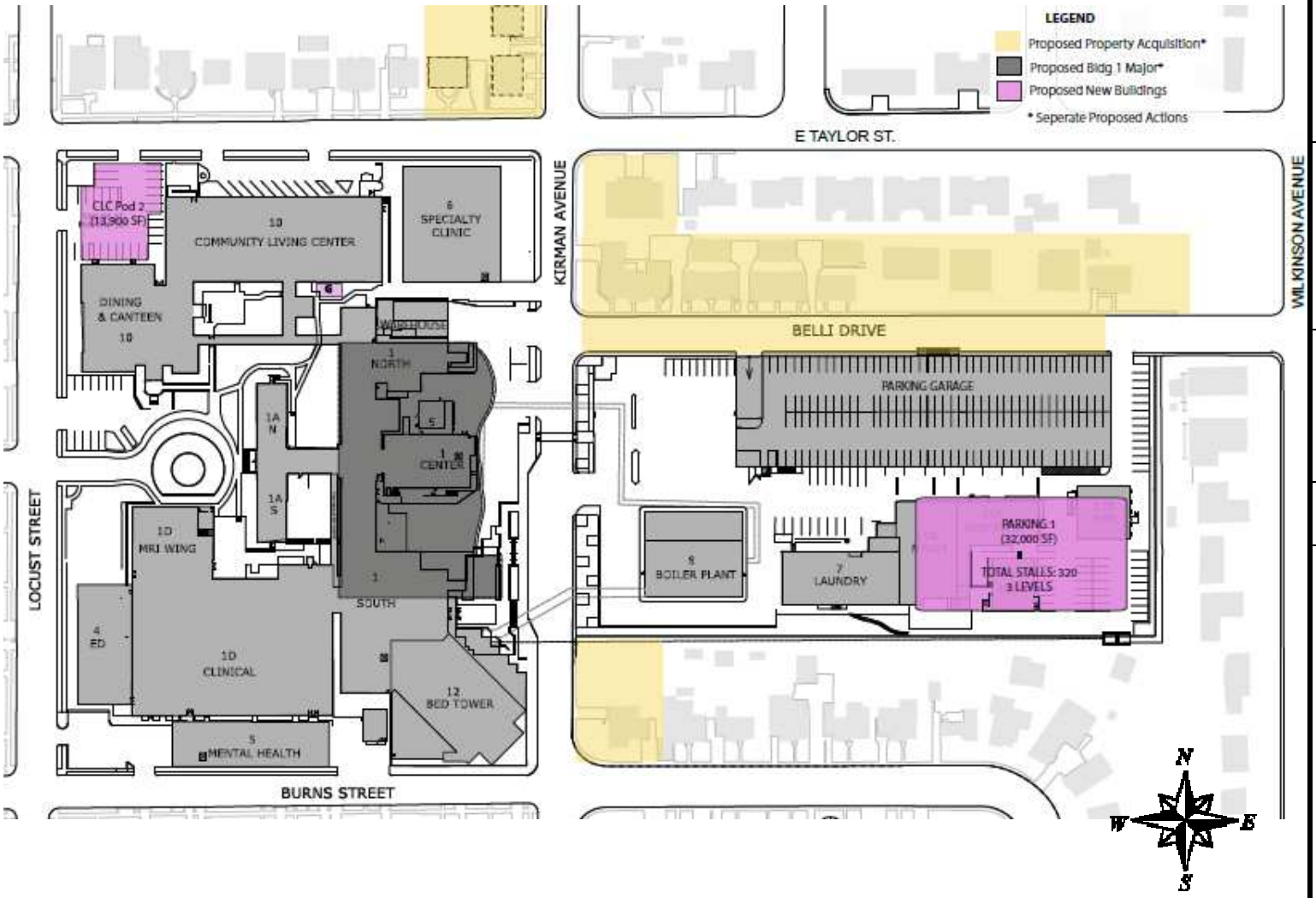

FIGURE 6
PROPOSED VASNHCS CAMPUS CONSTRUCTION PROJECTS

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS CAMPUS RENOVATION AND MODERNIZATION
RENO, NEVADA

PREPARED FOR

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Environmental, Geotechnical Engineering & Testing

1.4 Purpose and Need

The ***purpose*** of the Proposed Action is to provide modern, adequately-sized VASNHCS healthcare facilities to meet the current and growing future needs of Reno area Veterans and Federal design standards, setbacks and security requirements.

The Proposed Action is ***needed*** because existing VASNHCS campus facilities are antiquated and inadequately sized to provide the modern delivery of healthcare services needed by Reno area Veterans. Existing VASNHCS campus facilities were mostly constructed in the late 1930s and early 1990s, are not designed to modern VA standards, and do not meet the needs of today's Veterans. In addition, Reno area Veteran needs for healthcare services have increased dramatically. From FY 2007 to FY 2014, the number of patients receiving healthcare services at 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). These Veteran patient service deficiencies are projected to grow in the future as the patient workload for the VASNHCS continues to increase. In addition, the existing VASNHCS campus does not meet all modern VA design standards and Federal safety, setback and security requirements.

VASNHCS campus needs are many and wide-ranging. As noted in Sections 1.1 and 1.2, VA has planned and is implementing many initiatives to renovate, modernize, and expand the VASNHCS campus to meet the current and projected healthcare needs of Reno area Veterans. Descriptions of the projects included in this Proposed Action are provided in Section 2.2. Specific VASNHCS campus needs that would be addressed by the projects included in this Proposed Action are as follows:

Construction Projects

<u>New Community Living Center Pod 2</u>

The proposed new CLC building would provide needed additional space to transform nursing home services provided by VASNHCS. The CLC buildings would provide space for patient activities and a physical layout conducive with a home-like environment that cannot be provided in the existing nursing home building. At the end of the proposed project, the facility would have long term care buildings that are compliant with current VA long term care standards, which would provide much improved patient safety, corrected infrastructure deficiencies, an improved environment for infection control measures, and increased quality of life.

<u>Demolition of Small Eastern Campus Buildings</u>

Five small buildings on the eastern side of the campus (Buildings 15A & 15B, F, K, and 138), constructed approximately 20 to 35 years ago, have exceeded their life expectancy, are not compliant with current VA space allocations and contain numerous utility deficiencies. The VASNHCS campus is fully developed and land-locked within an urban area with limited available space for new construction necessary to meet the current needs of the facility. As part of the Proposed Action, VA would demolish the underutilized and functionally obsolete buildings (Buildings 15A and 15B, F, K and 138). This would create valuable additional space in the southeastern portion of the campus for future development opportunities (the proposed new parking structure).

Construction of New Parking Structure

The VASNHCS is currently experiencing an approximately 580-space on-campus parking deficiency that is projected to grow in the future as Veteran use of the facility increases. The VASNHCS currently relies on street parking in the residential neighborhoods surrounding the VASNHCS campus to accommodate the on-campus parking deficiencies. This has resulted in over utilization of the residential street parking, traffic congestion, and pedestrian hazards. Additional on-campus parking is needed to address the on-campus parking deficiency and the off-site parking concerns. The proposed new parking structure, to be located in the vacant area that would be created by the proposed eastern campus small building demolition project, would provide approximately 320 on-campus parking spaces.

New North Campus Backup Power Generators

Additional backup electrical power generators are needed to address numerous existing emergency power deficiencies at the north side of the VASNHCS campus, specifically the current CLC and Specialty Clinic buildings. These buildings are currently supported by a single, undersized backup generator. A second backup electrical generator would be added to close the existing emergency power gap for these buildings and a third backup generator would be added to meet VA's emergency power redundancy requirements. This project would also replace the existing diesel underground storage tank (UST) used to fuel the generators, which is aged and in need of replacement.

Renovation Projects

Renovate Ward B3 Space Adjacent to New Intensive Care Unit

Approximately 5,000 SF of Ward B3 space adjacent to the new ICU was formerly used as part of the facility's inpatient ward that was moved to Ward B5. This functionally obsolete area would be renovated to improve staff and patient efficiency of services.

Renovate and Right-Size Operating Rooms and Operating Room Suite

VASNHCS Operating Rooms do not meet current VA design criteria – they are undersized, have low ceilings, and lack a clean core. All four of the facility's Operating Rooms are smaller than current VA space criteria. In addition, the Operating Rooms have faulty piping and electrical issues, and an antiquated air handling system that does not provide a sufficient number of air exchanges per hour per current VA criteria. This project would renovate and right-size the Operating Rooms, including an expansion of approximately 1,300 SF. The renovation and new construction would occur in the approximately 14,000 SF vacated space that formerly housed the ICU. This project would provide Operating Room support spaces and address current design issues, including a lack of clean core, and undersized Operating Rooms with low ceilings. In addition, this project would correct current utility issues. Better designed space, with updated utilities and size corrections, would improve the flow in the Operating Room suite, allowing for an increase in output. This would ensure rooms are able to accommodate expanding workload and ensure low wait times. The larger Operating Rooms to be provided by this project would also accommodate additional equipment within the room, allowing for better patient care.

Expand and Renovate Magnetic Resonance Imaging (MRI)

VASNHCS currently provides MRI services with a single MRI unit and is unable to meet current patient demand for these services, resulting in extended patient wait times and/or the need to outsource these services to other non-VA medical facilities. Patient demand for MRI services at the facility is projected to grow in the future. VA plans to expand and renovate the existing MRI Wing to add the new space necessary for a second MRI unit, control room, prep and recovery areas, and other associated support spaces. This project would allow the facility to close the entire projected gap for MRI services and; therefore, reduce patient wait times, eliminate the expenditures associated with sending these services off site, and maintain better coordinated quality healthcare services for Veteran patients.

Renovate Sterile Processing Service Area

The VASNHCS Sterile Processing Service Area is undersized for the current facility's needs and is outdated, resulting in inefficiencies. VA plans to renovate and expand the Sterile Processing Service Area to increase capacity to meet the facility's needs for medical equipment sterilization.

Renovate Vacated Primary Care Space for Pharmacy

The VASNHCS campus currently includes small pharmacies at numerous locations throughout the facility, with a division between the inpatient and outpatient pharmacies, resulting in operational inefficiencies. The current 20,000 SF Primary Care area in Building 12 will be vacated following the completion of VA's proposed Building 1 Seismic Upgrade and Clinical Expansion Project. VA plans to renovate the 20,000 SF to-be-vacated Primary Care area within Building 12 to consolidate pharmacy services into one convenient location.

1.5 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed renovation and modernization of the VASNHCS campus.

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

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

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

1.6 Related Environmental Documents

Related environmental documents include:

- A Historic Context for the Wells Neighborhood, Reno, Nevada, Summit Envirosoultions, Inc., July 2014.
- Cultural and Historic Resources Survey, VA Sierra Nevada Healthcare System. Diablo Green Consulting, Inc., February 2015.
- Reno Planning Commission Staff Report, City of Reno, October 2012.
- VA Sierra Nevada Healthcare System Renovation and Modernization Traffic Study Report, GHD, Inc. June 2016.
- Final Environmental Assessment, Proposed Acquisition of Land for the Construction and Operation of Surface Parking Lots and Proposed Modification of Kirman Avenue for the VA Sierra Nevada Healthcare System, TTL Associates, Inc., February 2016.
- Draft Environmental Assessment, VA Sierra Nevada Healthcare System, Reno Campus Clinical Expansion and Building 1 Seismic Upgrade, Klienfelder, Inc., June 2016.

SECTION 2: DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

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

2.2 Proposed Action

VA's Proposed Action would renovate and modernize the existing VASNHCS campus facilities to meet the current and growing needs of area Veterans. The Proposed Action is needed because existing facilities are antiquated and inadequately sized to provide the modern delivery of healthcare services needed by Reno area Veterans. These deficiencies are projected to grow in the future as the patient workload for the VASNHCS increases. In addition, the VASNHCS campus does not meet all modern VA design standards and Federal safety, setback and security requirements.

Several renovation and modernization projects are proposed for the VASNHCS campus. Those projects included within the Proposed Action include:

- Construction of New CLC Pod 2
- Demolition of Small Eastern Campus Buildings
- Construction of a New Parking Structure
- Installation of New North Campus Backup Power Generators
- Renovation of Ward B3 Space Adjacent to the New ICU
- Renovate and Right-Size Operating Rooms and Operating Room Suite
- Expand and Renovate MRI Area
- Renovate Sterile Processing Service Area
- Renovate Vacated Primary Care Space for Pharmacy

VA would design and complete the proposed VASNHCS campus renovation and modernization projects in compliance with modern VA design criteria, nationally recognized building codes, and State and local building codes, to the maximum extent practicable. Prior to construction, VA would obtain all applicable Federal, State, and local permits for the proposed construction from appropriate government authorities. VA would incorporate the general best management practices and management measures identified in this EA into the design process to ensure potential environmental effects are maintained at less-than-significant levels (see Section 5).

2.3 Alternatives Analysis

The NEPA, CEQ Regulations, and 38 CFR Part 26 require all reasonable alternatives to be rigorously 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 modern, adequately-sized VASNHCS healthcare facilities that meet the purpose of and need for the Proposed Action. "Unreasonable" alternatives would not enable VA to meet the purpose of and need for the Proposed Action.

2.3.1 Alternatives Development

VA undertook a sequential planning and screening process, seeking reasonable alternatives for the development of a modern, adequately-sized VASNHCS facility in general, and the Proposed Action in specific. After identifying existing onsite capability shortfalls and deficiencies, VA began developing alternatives to support a more modern, adequately-sized VASNHCS facility, Alternatives considered included renovating and reconfiguring the existing VASNHCS facilities, constructing a replacement facility at the current location or some new site in the Reno area, and outsourcing healthcare services to other existing medical facilities in the Reno area.

VA developed a list of screening criteria to guide the alternative review, evaluation, and selection process. These screening criteria included the physical, operational, and location requirements of the VASNHCS facility, as well as land availability, overall project costs, environmental issues, and other factors, as described below.

The screening criteria included:

1. **Location**: An alternative site for the VASNHCS facility should be located within or the Reno area in a suitable configuration to accommodate the Proposed Action.

2. **Size:** An alternative site should provide adequate land to accommodate the Proposed Action.

3. **Cost:** The alternative needs to be able to be developed to suit VA's needs and mission at reasonable costs.

4. **Continuous Operations:** The alternative should allow for continuous VA operations and services and should not impact VA's ability to provide these services to regional Veterans. The proposed facilities must not conflict with ongoing use of the VASNHCS during construction or operation. Implementation of the Proposed Action should maintain continuous, seamless operation of all existing VASNHCS functions.

5. **Availability:** An alternative site should be available for acquisition by VA from willing landowners to facilitate design and construction of the Proposed Action.

6. **Land Use Compatibility:** An alternative site should be located in an area with compatible offsite land use and appropriate local zoning, as designated by the local government.

7. **Environmental:** An alternative site should have few environmental concerns, such as hazardous waste contamination, asbestos, lead-based paint, wetlands, floodplain or flooding issues, geotechnical, cultural or biological concerns, or other regulated environmental resource concerns.

VA then reviewed the possible development alternatives against the screening criteria to determine locations and facilities best suited to meet the purpose of and need for the Proposed Action. Through this analysis, VA concluded that only the renovation and modernization of the current VASNHCS campus met the screening criteria and was reasonable to meet the purpose and need of the Proposed Action. The proposed renovation and modernization projects associated with the Proposed Action are described in Section 2.3.2. Alternatives eliminated from further consideration, including the development of a modern replacement facility at the current VASNHCS campus location or at a new site, and outsourcing healthcare services to other medical facilities, are discussed in Section 2.3.3.

2.3.2 Evaluated Alternatives

This EA examines in-depth two alternatives, the Proposed Action Alternative and the No Action Alternative, defined as follows:

Proposed Action Alternative

VA's Proposed Action is the renovation and modernization of existing VASNHCS campus facilities. The following projects are included in the Proposed Action Alternative:

Construction Projects

New Community Living Center Pod 2

This project would construct a new CLC building at the southeast corner of Locust and E. Taylor Street, which is currently used as a VASNHCS paved, surface-level parking lot. The newly constructed two-story, approximately 16,700 gross SF building would include an estimated 12,900 SF of CLC space and 1,000 SF of common space and would provide 12 to 20 beds. In addition, the existing CLC building would undergo interior renovations. The CLC buildings would provide needed space for patient activities and a physical layout conducive with a home-like environment that is compliant with current VA long term care standards and cannot be provided in the existing nursing home building. Anticipated to begin in 2022.

Demolition of Small Eastern Campus Buildings

This project would include the demolition of five underutilized and functionally obsolete single story buildings (Buildings 15A & 15B, F, K, and 138) located east of the Boiler Plant and Laundry in the southeastern portion of the campus and the relocation of the functions from these structures to other existing VASNHCS buildings. This project would create valuable additional space in the southeastern portion of the campus for future development opportunities (the proposed new parking structure). Anticipated to begin in fall 2017.

Construction of New Parking Structure

This project would include the construction of a new, three-level parking garage in the southeastern portion of the VASNHCS campus in the vacant area created by the proposed

eastern campus small building demolition project. The parking garage has not been designed yet, but is anticipated to have a footprint of approximately 32,000 SF, be approximately 36 to 42 feet above ground level, and provide approximately 320 on-campus parking spaces. Access to the parking structure would be provided by a drive from Belli Drive. Anticipated to begin in August 2018.

Installation of New North Campus Backup Power Generators

This project would include the installation of two additional backup electrical generators on the northern portion of the campus, adjacent to Blockhouse 10 (south of the existing CLC), where an existing, undersized backup electrical generator is located. The electrical output of the new generators has not been determined; however, the generators would be fueled by diesel fuel. The generators would be equipped with mufflers and emission control equipment to reduce noise, vibration, and air emissions during operation. Neither generator would be routinely used during normal VASNHCS operations; they would be used in the event of a power failure associated with the local utility provided electrical service. The generators would be operated periodically for short periods without power failure to ensure functionality in the event of a power failure. This project would also replace the existing diesel UST used to fuel the current backup generator with a new, double-walled UST with interstitial monitoring that would fuel the existing generator as well as the two new generators. Anticipated for 2017.

Renovation Projects

Renovate Ward B3 Space Adjacent to New ICU

This project would renovate approximately 5,000 SF of Ward B3 space adjacent to the new ICU for improved staff and patient efficiency of services.

Renovate and Right-Size Operating Rooms and Operating Room Suite

This project would renovate and right-size the Operating Rooms, including an expansion of approximately 1,300 SF into the courtyard area (north) for the Operating Rooms and renovation the existing Operating Room space. The renovation and new construction would occur in the approximately 14,000 SF vacated space that formerly housed the ICU, allowing for continuous operations of current Operating Rooms while project is under construction. This project would provide Operating Room support spaces and address current design issues, including a lack of clean core, and undersized Operating Rooms with low ceilings. This project would also correct utility issues, including grandfathered air handling, faulty piping, and electrical issues.

Renovate and Expand MRI Wing

This project would include an approximately 4,000 SF building addition to the existing MRI Wing to provide space necessary for a second MRI unit, control room, prep and recovery areas, and other associated support spaces. The project would also include renovating the existing 3,400 SF MRI area. This project would allow the facility to close the entire projected gap for MRI services.

Renovate Sterile Processing Service Area

This project would renovate and expand the Sterile Processing Service Area in Building 1D by approximately 3,000 SF to meet the facility's needs for medical equipment sterilization.

Renovate Vacated Primary Care Space for Pharmacy

This project would renovate the current 20,000 SF Primary Care area in Building 12 that will be vacated following the completion of the proposed Building 1 Seismic Upgrading, Renovation, and Expansion Project to consolidate pharmacy services into one convenient location.

The Proposed Action Alternative effectively provides the best alternative to renovate and modernize the VASNHCS to provide the modern delivery of healthcare services needed by Reno area Veterans. The Proposed Action would help meet current and projected needs for the VASNHCS.

No Action Alternative

Under the No Action Alternative, the renovation and modernization projects included in the Proposed Action would not be implemented and operations at the VASNHCS would continue as currently conducted. This alternative would not allow VA to provide required and necessary medical care to Veterans living within the Reno area. Patients would continue to lack privacy within antiquated facilities; operations would continue under inefficient, inadequate, un-safe, and outdated conditions; and existing medical center space deficiencies would remain and increase in the future. In addition, patients, staff and the community would face continued and increasing parking and safety challenges as on-campus parking space shortages would continue.

While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative is retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under CEQ Regulations (40 CFR Part 1502.14). The No Action Alternative reflects the *status quo*, serving as a standard against which VA can evaluate the effects of the Proposed Action.

2.3.3 Alternatives Eliminated From Further Consideration

As described in Section 2.3.1, VA eliminated other initially considered alternatives to renovating and modernizing the existing VASNHCS campus. Each of these alternatives failed to meet VA's screening criteria. The following provides a brief discussion of VA's rationale for eliminating these alternatives.

New VA Medical Facility at the Current Location

Under this alternative, VA would demolish the existing, outdated medical center facilities at the current VASNHCS campus site and construct a new, modern medical center at this property. This alternative would provide modern VA healthcare facilities that would meet Reno area Veterans needs for the foreseeable future. However, the complete demolition and reconstruction of the medical center would require several years to accomplish, during which time, Veterans using the VASNHCS would need alternate healthcare facilities. No alternate VA facilities are located in the region. In addition, this alternative would be much more expensive than the renovation of the campus, well beyond the VA funding that is available. This alternative was considered to be too disruptive to VA's provision of healthcare and cost-prohibitive and thus, was eliminated from further consideration.

New VA Medical Facility at New Location

Under this alternative, VA would acquire and develop a new, modern medical center at a new site in the Reno metropolitan area. This alternative would maintain the continuity of healthcare provided by VA during the new medical center construction and would provide a modern VA healthcare facility that would meet Reno area Veterans needs for the foreseeable future. However, site acquisition and construction costs must be reasonable to be an appropriate use of taxpayers' funds. The cost of purchasing a new site and constructing an entirely new VA medical center facility would be far greater than the renovation and modernization of the existing VASNHCS campus. As such, this alternative was considered cost-prohibitive and was eliminated from further consideration.

Outsourcing Healthcare Services

Under this alternative, VA would send Veteran patients to other existing medical facilities in the Reno metropolitan area where they could receive the privacy and/or more modern care the VASNHCS is currently struggling to provide. While Veterans may, with many exceptions (Veteran special needs care) receive the care they require under this alternative, this alternative would not allow the VA to fulfill its purpose of providing the best and most comprehensive medical care possible to Veterans. In addition, VA would not be able to effectively control the quality and consistency of outsourced medical care and the high cost of outsourcing would be cost-prohibitive. This alternative does not meet the purpose of or need for the Proposed Action and does not address existing space and care deficiencies at the VASNHCS. As such, this alternative was not considered reasonable and was eliminated from further consideration.

SECTION 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) environmental, cultural, and socioeconomic conditions at the VASNHCS campus and its general vicinity (see Figures 1-5) with emphasis on those resources potentially impacted by the Proposed Action. Under each resource area, the potential direct and indirect effects of implementing the Proposed Action Alternative and the No Action Alternative on these environments are identified. Potential cumulative impacts associated with the Proposed Action and other planned VASNHCS campus projects are also discussed under each resource area and Section 3.17.

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

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

Context refers to the significance of an effect to society as a whole (human and national), to an affected region, to affected interests, or to just the locality. In other words, the context measures how far the effect would be "felt."

Intensity refers to the magnitude or severity of the effect, whether it is beneficial or adverse. Intensity refers to the "punch strength" of the effect within the context involved.

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

Significance criteria for resource areas considered in this EA are as follows:

- *Aesthetics.* An alternative could significantly affect visual resources if it resulted in abrupt changes to the complexity of the landscape and skyline (i.e., in terms of vegetation, topography, or structures) when viewed from points readily accessible by the public.

- *Air quality.* An alternative could have a significant air quality effect if it would result in substantially higher air pollutant emissions or cause established air quality standards to be exceeded.

- *Cultural resources.* An alternative could have a significant effect on cultural resources if it would: result in damage, destruction, or demolition to an archaeological site or building that is eligible or listed on the National Register of Historic Places; promote neglect of such a resource, resulting in resource deterioration or destruction; introduce audio or visual intrusion to such a resource; or decrease access to resources of value to federally recognized Native American tribes. Impact assessment for cultural resources focuses on properties that are listed in or considered eligible for the National Register of Historic Places or are National Historic Landmarks.

- *Geology and Soils.* If an alternative would result in an increased geologic hazard or a change in the availability of a geologic resource, it could have a significant effect. Such geologic and soil hazards would include, but not be limited to, seismic vibration, land subsidence, and slope instability.

- *Hydrology and Water Quality.* If an alternative would result in a reduction in the quantity or quality of water resources for existing or potential future use, it could have a significant effect. A significant effect could occur if the demand exceeded the capacity of the potable water system.

- *Wildlife and Habitat.* The effect of an alternative on biological resources and ecosystems could be significant if it would disrupt or remove any endangered or threatened species or its designated critical habitat. The loss of a substantial number of individuals of any plant or animal species (sensitive or non-sensitive species) that could affect the abundance or diversity of that species beyond normal variability could also be considered significant. The measurable degradation of sensitive habitats, particularly wetlands, could also be significant.

- *Noise.* An alternative could have a significant noise effect if it would generate new sources of substantial noise, increase the intensity or duration of noise levels to sensitive receptors, or result in exposure of more people to unacceptable levels of noise.

- *Land use.* If an alternative would conflict with adopted plans and goals of the affected community or if it would result in a substantial alteration to the present or planned land use of an area, it could have a significant direct effect. If an alternative would result in substantial new development or prevent such development elsewhere, it could have a significant indirect effect. In addition, an alternative could significantly affect visual resources if it resulted in abrupt changes to the complexity of the landscape and skyline (i.e., in terms of vegetation, topography, or structures) when viewed from points readily accessible by the public.

- *Floodplains, Wetlands, and Coastal Zone Management.* An alternative could have a significant effect on water resources if it would cause substantial flooding or erosion, if it would subject people or property to flooding or erosion, or if it would adversely affect a significant water body, such as a stream or lake.

- *Socioeconomics.* If an alternative would substantially alter the location and distribution of the population within the geographic “region of influence” cause the population to exceed historical growth rates, or substantially affect the local housing market and vacancy rates, the effect would be significant. Significant effects could occur if an

alternative caused disproportionate risks to children that resulted from environmental health risks or safety risks. In addition, an alternative could have a significant effect if it would create a need for new or increased fire or police protection, or medical services, beyond the current capability of the local community, or would decrease public service capacities so as to jeopardize public safety. *It is important to note that, per CEQ Regulations (40 CFR 1508.14), social or economic effects are not intended by themselves to require preparation of an EIS.* Only when social or economic effects are interrelated with natural or physical environmental effects will all of these effects be analyzed as part of the NEPA process.

- *Community Services.* An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition.

- *Solid and Hazardous Materials.* An alternative could have a significant effect if it would result in a substantial increase in the generation of hazardous substances, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation. Data provided in the site-specific ESAs and other prior HTMW studies helps to identify these potential impacts, as well as their significance.

- *Transportation and Parking.* An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition. For instance, an alternative could have a significant effect on traffic if it would increase the volume of traffic beyond the existing road capacity, cause parking availability to fall below minimum local standards, or require new or substantially improved roadways or traffic control systems.

- *Utilities.* An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition.

- *Environmental Justice.* Significant effects could occur if an alternative would disproportionately affect minority or low-income populations.

3.2 Aesthetics

The VASNHCS campus is located in an urban, fully developed area approximately 1.2 miles southeast of the center of the City of Reno, Nevada. The approximately 12.5-acre VASNHC campus is divided into eastern and western portions by Kirman Avenue. The eastern portion of the VASNHCS campus is generally bounded by Kirman Avenue to the west, Belli Drive to the north, residential properties along the west side of Wilkinson Avenue to the east, and residential properties on the north side of Balzar Circle to the south. The eastern portion of the VASNHCS campus currently includes a two-story parking garage, the VASNHCS Boiler Plant (Building 8), Laundry (Building 7), Maintenance Department (Building 15B), Research Department (Building 15A), Engineering Department (Building 138), Safety Department (Building F), Research Conference Room (Building K), paved areas, and surface-level parking. The western portion of

the VASNHCS campus is generally bounded by East Taylor Street to the north, Kirman Avenue to the east, Burns Street to the south, and Locust Street to the west. The western portion of the VASNHCS campus currently includes a CLC (Building 10), Specialty Clinic (Building 6), Dining and Canteen (Building 10), and the main hospital building, including Buildings 1 North, 1 Center, 1 South, 1A North, 1A South, 12 (Bed Tower), 1D (Clinical/OR and MRI Wing), 4 (ER), and 5 (Mental Health), and four small surface-level parking lots.

The western portion of the VASNHCS campus is adjoined to the north across East Taylor Street, to the south across Burns Street, and to the west across Locust Street by residential properties; and to the east across Kirman Avenue by the eastern portion of the VASNHCS campus and residential properties. The eastern portion of the VASNHCS campus is adjoined to the north across Belli Drive, to the east, and to the south by residential properties; and to the west across Kirman Avenue by the western portion of the VASNHCS campus.

Aesthetics are managed by the City of Reno through the Chapter 8.32 (Trees and Shrubs), Chapter 18.12 (General Development and Design Standards), and Chapter 18.08 (Zoning) of the Reno Land Development Code (RLDC).

3.2.1 Effects of the Proposed Action Alternative

The Proposed Action would result in less-than-significant adverse aesthetic impacts. The VASNHCS campus is located in an urban, mixed institutional and residential use area, dominated by the existing VASNHCS campus, which has occupied the area since 1939. The Proposed Action projects would change the appearance of the VASNHCS campus, but would not result in an abrupt change to the visual resources of the area. The Proposed Action projects would be designed and implemented in a way that is visually consistent with the existing VASNHCS campus and surrounding areas. Aesthetic effects associated with each Proposed Action project are discussed below.

Construction Projects:

<u>New Community Living Center Pod 2</u>

This project would be located at the southeast corner of Locust and East Taylor Street, which is currently used as a paved, VASNHCS surface-level parking lot. The new two-story building would be approximately 16,700 gross square feet and would adjoin the western side of the existing CLC. In addition, the existing CLC building would undergo interior renovations, which would not be visible outside of the building. The new CLC building would be visible from adjoining residential properties to the north and west across East Taylor and Locust Streets. However, the proposed new CLC building would be designed to match the general character of the existing adjacent CLC building and the rest of the more massive existing VASNHCS campus, as such, the aesthetic impacts associated with the new CLC building are anticipated to be minor and less-than-significant.

<u>Demolition of Small Eastern Campus Buildings</u>

This project would include the demolition of (Buildings 15A & 15B, F, K, and 138), five underutilized and functionally obsolete single story buildings in the southeastern portion of the campus for the construction of a new parking structure (see below). The demolition of these small buildings would have minimal aesthetic impact.

Construction of New Parking Structure

This project would include the construction of a new, three-level (one ground level, two elevated levels) parking garage in the southeastern portion of the VASNHCS campus in the vacant area created by the proposed small building demolition project. The parking garage has not yet been designed, but is anticipated to have a footprint of approximately 32,000 SF and extend to a height of approximately 36 to 42 feet above grade. The new parking garage would be located adjacent to the existing two-level parking structure on the eastern portion of the campus. The parking garage would be partially visible from adjoining residential properties to the east and south of the campus and would be shielded from view from the residential properties to the north of the campus by the existing two-story parking garage. The proposed parking structure would be taller than the existing single story structures and more visible to surrounding areas. The parking structure could also shade easterly adjacent residential properties during late afternoon and evening hours. However, the eastern portion of the VASNHCS campus is already occupied by a parking structure and the construction of an additional parking structure in this area would not represent an abrupt change to the visual resources of the area. The aesthetic impacts associated with the new parking garage are anticipated to be moderate and less-than-significant.

Installation of New North Campus Backup Power Generators

This project would include the installation of two additional backup electrical generators on the northern portion of the campus, adjacent to Blockhouse 10 (south of the existing CLC). The two additional backup electrical generators would be located in the interior portion of the VASNHCS campus and entirely shielded from view from the surrounding properties by the existing campus buildings. As such, there would be no aesthetic impacts associated with the two additional backup electrical generators.

Renovation Projects:

Renovate and Right-Size Operating Rooms and Operating Room Suite

This project would renovate and right-size the Operating Rooms, including an expansion of approximately 1,300 SF into an existing VASNHCS courtyard area (north). The small exterior expansion associated with this project would be located in the interior of the VASNHCS campus and entirely shielded from view from the surrounding properties. The remaining portions of this project are entirely within the interior of existing VASNHCS buildings and would not be visible. As such, there would be no aesthetic impacts associated with this project.

Renovate and Expand MRI Wing

This project would include an approximately 4,000 SF building addition to the existing wing, located on the western portion of the campus. The 4,000 SF building addition would be visible from surrounding properties to the west, but would be shielded from view from the north, east, and south by existing buildings associated with the VASNHCS campus. The proposed 4,000 SF MRI building addition would be designed to match the general character of the rest of the VASNHCS campus and would be a very minor addition to the large campus, as such, the aesthetic impacts associated with this project would be minimal and less-than-significant.

The remaining Proposed Action renovation projects would be entirely within the interior of existing VASNHCS buildings, would not be visible to the surrounding area, and would have no aesthetic impacts.

3.2.2 Cumulative Impacts

With the exception of the proposed construction of CLC Pod 2 and the new parking structure, the Proposed Action projects would have minimal or no aesthetic impacts and would not contribute to cumulative impacts. CLC Pod 2 and the new parking structure would be visibly noticeable from certain areas surrounding the campus; however, these structures would be designed to match the general character of the VASNHCS campus and would be consistent with similar structures of like use in these areas of the campus. Therefore, their aesthetic impacts would be less-than-significant and would have minor contribution to cumulative aesthetic impacts. Through general BMPs, project-specific management measures, and coordination and consultation with the City of Reno and community representatives, VA has considered and minimized the aesthetic impacts of each of its planned projects. The proposed modifications of Kirman Avenue will include additional landscaping and pedestrian-friendly improvements that will have a positive aesthetics impact. The largest and most noticeable project, the proposed five-story clinical addition to the eastern side of Building 1, will be designed to remain visually consistent with existing Building 1 massing and height, yet provide a modern, attractive entrance and addition to the medical center building. VA has conducted community and Veteran outreach efforts for the design and appearance of the clinical addition. No significant adverse cumulative aesthetic impacts are anticipated. Close and ongoing coordination between VA and the City of Reno, and other community agencies and representatives would serve to manage and control cumulative effects within the ROI.

3.2.3 Effects of the No Action Alternative

Under the No Action Alternative, no demolition, construction, or renovation by VA would occur. No aesthetic impacts by VA would occur as the VASNHCS campus would continue its current operations.

3.2.4 Mitigation/Management Measures

No significant adverse aesthetic impacts are anticipated and project-specific mitigation measures are required.

Aesthetic impacts in general, would be maintained at less-than-significant levels through project planning and development, to the extent practicable, in accordance with Chapter 8.32 (Trees and Shrubs), Chapter 18.12 (General Development and Design Standards), and Chapter 18.08 (Zoning) of the RLDC. In addition, VA would implement the following BMP to reduce aesthetic impacts:

- Maintain landscaping along site boundaries with residences.
- Design the new parking structure to maintain setback distances from the surrounding residential properties to the extent possible.
- The Proposed Action projects would be designed and implemented in a way that is visually consistent with the existing VASNHCS campus.

3.3 Air Quality

3.3.1 Regulatory Background

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, as amended (CAA and CAAA) requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the following principal pollutants, called “criteria pollutants” (as listed under Section 108 of the CAA):

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO_x)
- Ozone (O_3)
- 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)

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

In October 2015, as part of the EA scoping process, the USEPA stated that the VASNHCS is located in an area designated as non-attainment (serious) for the PM_{10} NAAQS. In addition, USEPA stated that the VASNHCS is located in a maintenance area for carbon monoxide; indicating that general conformity still applies because of its maintenance designation.

Updated information (2016) from Washoe County Air Quality Management Division and USEPA indicates that the Reno area attained the PM_{10} NAAQS in 2011 and subsequent air quality monitoring data demonstrated that the area has continued to the attain the PM_{10} NAAQS since that time. In December 2015, USEPA redesignated the Reno area as attainment (maintenance) for PM_{10}. The Reno area of Washoe County is currently designated as a *maintenance* area for the PM_{10} and carbon monoxide. Washoe County is designated as *full-attainment* or is not classified for all other criteria pollutants (Washoe County Air Quality Management Division, 2016).

Greenhouse Gases and Climate Change

Gases that trap heat in the atmosphere are often called greenhouse gases (GHG). Some greenhouse gases, such as carbon dioxide occur naturally and are emitted to the atmosphere through natural processes and human activities. Other greenhouse gases (e.g., fluorinated gases) are created and emitted solely through human activities.

The principal greenhouse gases that enter the atmosphere because of human activities are:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Fluorinated gases (e.g., hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride)

Gases in the atmosphere can contribute to the greenhouse effect both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other greenhouse gases, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the earth. It is now well established that rising global atmospheric GHG emission concentrations are significantly affecting the Earth's climate. Based primarily on scientific assessments, the USEPA has issued a finding that the changes in our climate caused by increased concentrations of atmospheric GHG emissions endanger public health and welfare. However, the Federal government has not adopted any comprehensive national strategy to reduce GHG emissions.

The USEPA requirements for Mandatory Reporting of Greenhouse Gases Rule (74 FR 56260), which requires reporting of greenhouse gas data and other relevant information from large sources and suppliers in the United States, are designed to collect accurate and timely GHG data to inform future policy decisions. EOs 13423 and 13514 require Federal agencies to reduce GHG emissions.

In December 2014, the CEQ released its Revised Draft Guidance on the Consideration of Greenhouse Gas Emissions and the Effects of Climate Change (GHG Guidance Document), which describes how Federal agencies should consider the effects of GHG emissions and climate change in their NEPA decision-making documents. The guidance indicates that Federal agencies should consider both the potential effect of a proposed action on climate change, as indicated by its estimated GHG emissions, and the implications of climate change for the environmental effects of a proposed action. The guidance indicates that the agency analysis should be commensurate with the projected GHG emissions and climate impacts of the proposed action. It recommends that agencies consider 25,000 metric tons of carbon dioxide equivalent emissions on an annual basis as a threshold below which quantitative analysis of GHG is not recommended.

Operating Permits

The CAA regulates criteria pollutants as well as 188 specifically listed hazardous air pollutants (HAPs). The Title V Operating Permit Program under 40 CFR 70 requires sources that meet the definition of a "major source" of criteria pollutants or HAPs to apply for and obtain a Title V operating permit. A major source of HAPs has the potential to emit (PTE) more than 10 tons per year (tpy) of any individual HAP, or 25 tpy of any combination of HAPs. The definition of major source for criteria pollutants is dependent on the air quality attainment status of the region where the source is located (i.e., areas that are in attainment or non-attainment with the NAAQS). Major sources have a PTE more than 100 tpy of any criteria pollutant in an attainment area or lower levels in various classifications of non-attainment (i.e., marginal, moderate, serious, severe, and extreme).

The VASNHCS currently generates air emissions (e.g., from boilers, generators, or other minor equipment); however, the VASNHCS is not considered to be a major source of criteria pollutants. The VASNHCS does not have and is not required to have a Title V operating permit.

State and Local Regulations

Nevada Administrative Code (NAC) Chapter 445B (Air Control) contain provisions to protect Nevada's air quality through monitoring, inspection, permitting, and rules, and is administered by the Nevada Division of Environmental Protection (NDEP); however, according to the NDEP, Bureau of Air Pollution Control, the responsibility of maintaining air quality in the City of Reno has been delegated by the NDEP to the Washoe County Air Quality Management Division (AQMD). The Washoe County Air Quality Management Division air quality regulations require a permit for the construction of a new air emissions source, modifying an existing air emissions source, or operating a new air emissions source.

Conformity with State Implementation Plans

The General Conformity Provision of the CAA of 1970 (42 USC 7401 *et seq*.; 40 CFR Parts 50-87) Section 176(c), including the USEPA's implementation mechanism, the General Conformity Rule (40 CFR Part 51, Subpart W), prohibits the Federal government from conducting, supporting, or approving any actions that do not conform to a USEPA-approved State Implementation Plan (SIP). A SIP is a state's self-authored blueprint for achieving and maintaining compliance with the goals of the CAA.

Federal agencies prepare written Conformity Determinations for Federal actions in or affecting NAAQS non-attainment areas or maintenance areas when the total direct and indirect emissions of non-attainment or maintenance pollutants exceed specified thresholds. Conformity with the SIP is demonstrated, and Conformity Determinations are not required, if project emissions fall below the threshold values.

According to the Washoe County Air Quality Management Division and USEPA, the Reno area of Washoe County is designated as a *maintenance* area for PM_{10} and carbon monoxide. Washoe County is designated as *full-attainment* or is not classified for all other criteria pollutants (Washoe County Air Quality Management Division, 2016).

3.3.2 Sensitive Receptors

Sensitive air quality receptors in the vicinity of VASNHCS campus include the surrounding residential neighborhoods. In addition, Veterans Memorial Elementary School (1200 Locust Street) is located approximately 600 feet south of the campus; Bailey Charter elementary School (1090 Bresson Avenue) is located approximately 600 feet southeast of the campus; Vaughn Middle School (1200 Bresson Avenue) is located approximately 900 feet southeast of the campus; and Booth Elementary School (425 East 9th Street) is located approximately 1,300 feet north of the campus. There are no other hospitals or schools located within 2,000 feet of VASNHCS campus. No other sensitive air quality receptors were identified in the site area.

3.3.3 Effects of the Proposed Action Alternative

Air emissions generated from the Proposed Action would have less-than-significant direct and indirect, short- and long-term adverse impacts to the existing air quality environment around the

VASNHCS campus. Impacts would include short-term increased air emission levels as a result of demolition and construction activities and long-term increased air emission levels associated with the operation of the renovated and modernized VASNHCS campus.

Demolition and construction activities would be performed in accordance with Federal, State and local air quality requirements. Requirements would include compliance with WCAQMD regulations and an approved permit for construction under Section 030.020 of the District Board of Health Regulations Governing Air Quality Management. Construction emissions are generally short-term, but may still have adverse impacts on air quality, primarily due to the production of dust. Dust can result from a variety of activities, including excavation, grading, and vehicle travel on paved and unpaved surfaces. Dust from construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. Implementing dust control measures (BMPs) significantly reduces dust emissions from construction. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Construction-related emissions also include the exhaust from the operation of construction equipment, including diesel particulate matter (DPM). The use of newer construction equipment with emissions controls and minimizing the time that the equipment is idling (BMPs) reduce construction equipment exhaust emissions. Implementation of BMPs, discussed below in Section 3.3.5, including the preparation and implementation of a CEMP, would minimize the anticipated less-than-significant adverse, short-term air quality impacts.

The structures to be renovated or demolished at the VASNHCS may contain asbestos-containing building materials (ACM) and lead-based paint (LBP). Predemolition/renovation asbestos surveys would be conducted for each of the structures to be renovated or demolished as part of the Proposed Action. The surveys would identify and quantify ACMs, which would be removed by licensed asbestos abatement contractors in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) and Washoe County requirements prior to building renovation or demolition. Asbestos abatement procedures require the removal of ACM with various controls and monitoring to prevent asbestos emissions. The demolition of buildings containing LBP can result in the generation of LBP-containing dust. Standard demolition BMPs to control dust would reduce LBP dust emissions during demolition to less-than-significant levels.

The electrical output of the new backup power generators has not been determined; however, the generators would be fueled by diesel fuel. The generators would be equipped with emission control equipment to reduce air emissions during operation. Neither generator would be routinely used during normal VASNHCS operations; they would be used in the event of a power failure associated with the local utility provided electrical service. The generators would be operated periodically for short periods without power failure to ensure functionality in the event of a power failure. The two new backup generators would be more efficient and would individually require less fuel to be operated than the existing, undersized backup generator. As such, the two new backup generators would likely only result in a minor incremental increase in fuel to operate. Air emissions from the backup power generators would have less-than-significant adverse impacts to the existing air quality environment around the VASNHCS campus.

The Proposed Action would not have a significant adverse air quality impact during operation of the renovated and modernized VASNHCS facilities. A traffic study completed by GHD Inc. (GHD) estimated the Proposed Action would generate approximately 160 additional one-way

trips to/from the VASNHCS campus per day, a minor increase in traffic. The proposed parking structure would not have a significant impact on air quality. Vehicles that would use the proposed parking structure currently park on the streets in the residential areas surrounding the VASNHCS campus. The parking structure would not draw additional vehicles to the area. Therefore, there would be only a minor increase in vehicles (approximately 80 per day), vehicle miles travelled, and associated air emissions (including GHG emissions) as a result of the Proposed Action.

The VASNHCS is located in a *maintenance* area for PM_{10} and carbon monoxide. The minor air emissions from the Proposed Action renovation and modernization projects are not anticipated to exceed the *de minimis* emission levels for these NAAQS criteria pollutants.

The Proposed Action would have a negligible contribution to long-term global climate change. Direct GHG emissions from the short-term use of vehicles and mechanical equipment during construction of the Proposed Action projects would cease after the construction has been completed. Indirect GHG emissions from the use of electricity and from the minor increased vehicle traffic to and from the VASNHCS are also anticipated to be less-than-significant. GHG emissions as a result of Proposed Action construction and operational activities are anticipated to be well below the threshold of 25,000 metric tons of CO_2 annually.

Under Executive Order 13693, energy consumption per gross square foot of Federal buildings must be reduced by 2.5 percent per year in fiscal years 2015 through 2025. In addition, 10 CFR 433, as amended July 9, 2013, sets requirements for energy efficiency in new Federal buildings. Energy consumption by the Proposed Action projects would likely be reduced as a result of implementing more energy efficient building materials, equipment, and construction practices to meet these Federal requirements.

3.3.4 Cumulative Impacts

Air quality impacts associated with the Proposed Action are anticipated to be minor and would be reduced through careful coordination and implementation of the general BMPs and management measures, and compliance with regulatory requirements as outlined in Section 3.3.6. VA would implement similar management measures for each of its other planned projects.

Cumulative construction-related air quality impacts associated with the Proposed Action projects and other planned VASNHCS projects could occur if these construction projects were to be conducted simultaneously. The Proposed Action and other planned VASNHCS construction projects would be spread out over several years, reducing the impact of overlapping projects. The demolition of the small eastern campus buildings is planned for the fall of 2017, the construction of the new parking garage is planned to begin in August 2018 (after the completion of the demolition of the small eastern campus buildings), and construction of CLC Pod 2 is anticipated to begin in 2022.

The planned acquisition of the first 3 residential parcels, the demolition of the associated duplexes, and the construction of the surface parking lots on these parcels is scheduled to be completed by April 2018. The remaining residential parcels are anticipated to be acquired and redeveloped in late 2020. Kirman Avenue modifications are planned to begin in late 2021.

After the construction of the parking lots on the 3 residential parcels, the Building 1 Seismic Upgrade and Clinical Expansion Project will begin (spring 2018).

Based on the currently planned project schedules, Proposed Action construction activities may overlap with other planned VASNHCS campus construction activities. As currently projected, the Building 1 Seismic Upgrade and Clinical Expansion Project may be conducted at the same time as the new parking garage construction project. Project planning is dependent on many factors, including funding, design, and construction mobilization. To the extent practicable, VASNHCS will work to limit concurrent construction impacts.

VA previously conducted extensive air quality modeling for a proposed action of similar size and scope as all of the planned VASNHCS projects combined (the Proposed Action projects, the Building 1 Seismic Upgrade and Clinical Expansion Project, and the Land Acquisition Project). Using this modeling, the following total (cumulative) construction emissions of criteria air pollutants are estimated for the combined VASNHCS projects:

- Approximately 30 tons of CO.
- Approximately 55 tons of NO_x.
- Approximately 3.5 tons of PM_{10}.
- Approximately 3.0 tons of $PM_{2.5}$.

These total, cumulative direct construction-related emissions are less than the annual *de minimis* thresholds for each criteria air pollutant (100 tons per year). The VASNHCS construction activities would be spread out over several years, resulting in much lower annual emissions.

The less-than-significant cumulative air quality effects of the Proposed Action and other planned VASNHCS projects would be properly managed working in close cooperation with pertinent regulatory agencies. Overall, no significant adverse cumulative air quality impacts to the environment, induced by changes by the Proposed Action, are anticipated within the ROI. Close and ongoing coordination between VA and the City of Reno, and other community agencies and representatives would serve to manage and control cumulative air quality effects within the ROI.

3.3.5 Effects of the No Action Alternative

Under the No Action Alternative, no air quality effects from the Proposed Action would occur.

3.3.6 Mitigation/Management Measures

No significant adverse air quality impacts are anticipated and no project-specific mitigation measures are required.

VA would implement the following BMPs and would comply with all applicable Federal, State and local air quality permitting requirements to maintain short-term and long-term air quality effects (i.e., air emissions) at acceptable, less-than-significant levels. These measures would include:

- Complete predemolition asbestos surveys for each building proposed for renovation or demolition.

- Remove identified ACM from buildings to be demolished by Nevada-licensed abatement contractors as required under NESHAP, State and local regulations.
- Use dust suppressants during building demolition to control potential LBP-containing dust emissions.
- Comply with the Washoe County regulations regarding fugitive dust emissions.
- Comply with the Washoe County air quality regulations and obtain an approved permit for construction activities.
- Develop and implement a Construction Emissions Mitigation Plan (CEMP) to reduce impacts from fugitive dust and diesel particulate matter. The CEMP would include measures such as the use of newer construction equipment with emissions controls, minimizing the time that equipment is idling, etc. to reduce construction equipment exhaust emissions.
- Use appropriate dust suppression methods during onsite demolition/construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of demolition and earth-moving activities during high wind conditions.
- Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces.
- Cover haul trucks with tarps.
- Stabilize previously disturbed areas through re-vegetation or mulching if the area would be inactive for several weeks or longer.
- Visually monitor all construction activities regularly, particularly during extended periods of dry weather, and implement dust control measures when appropriate.

In addition, VA would secure and comply with any required air emissions permits from the Washoe County, as appropriate.

3.4 Cultural Resources

Cultural resources are the physical evidence of our heritage. Cultural resources are: historic properties as defined in the National Historic Preservation Act (NHPA), cultural items as defined in the Native American Graves Protection and Repatriation Act (NAGPRA), archaeological resources as defined in the Archaeological Resources Protection Act (ARPA), sacred sites as defined in EO 13007 to which access is provided under the American Indian Religious Freedom Act (AIRFA), and collections as defined in 36 CFR 79, *Curation of Federally Owned and Administered Collections*. Requirements set forth in NEPA, NHPA, ARPA, NAGPRA, AIRFA, 36 CFR 79, EO 13007, and Presidential Memorandum on *Government-to-Government Relations with Native American Tribal Governments* define the basis of VA's compliance responsibilities for management of cultural resources. Regulations applicable to VA's management of cultural resources include those promulgated by the Advisory Council on Historic Preservation (ACHP) and the National Park Service (NPS).

3.4.1 Architectural and Archaeological Resources

VA completed cultural and historic resources surveys and assessments of the VASNHCS campus and surrounding area in 2014 and 2015. These assessments included a review of

readily available data pertinent to the history, prehistory, ethnography, and environment of the area of VASNHCS, identified experts and others likely to be interested in and knowledgeable about the history, archaeology, and culture of the area, and completed a field inspection of the study area. Based on these analyses, and in consultation with the Nevada State Historic Preservation Office (SHPO), VA identified four historic properties/districts within the Area of Potential Effect (APE) of VA's various planned projects for the VASNHCS campus. None of these properties/districts are currently listed on the National Register of Historic Places (NRHP); however, all four were determined to be eligible for listing on NRHP. The four NRHP-eligible historic districts include:

- VASNHCS Campus Historical District (SHPO Resource D191). This district includes the original VA hospital on the western portion of the VASNHCS campus, which opened in 1939. Specific elements included within this district include: Building 1A, Building 1, the concrete flagpole base and flagpole, and the entry drive.

- City of Reno Wells Avenue Neighborhood Conservation District. This district, dedicated by the City of Reno in March 2013, has not formally been determined to be eligible for inclusion in NRHP, but for the purpose of VA's Section 106 of the NHPA and NEPA analyses, is considered to be NRHP-eligible. The Wells Avenue Neighborhood Conservation District is located west of the western portion of the VASNHCS campus (west of Locust Street). The district is designated from Ryland Street south to Vassar Street, and Holcomb Avenue east to Locust Street. The Wells Avenue Neighborhood Conservation District's period of significance is from 1904 to 1945.

- The Burke's Addition Historic District (SHPO Resource D189). This district is eligible for listing in the NHRP as an important example of masonry mid-twentieth century style architecture from 1904 through 1945. Burke's Addition was developed as an addition to the Wells Avenue Neighborhood with the majority of the buildings built prior to 1945. Burke's Addition includes a good representative mix of single-family housing styles of good integrity that reflect the period of significance (1904 to 1945). The Burke's Addition Historic District is located north and south of the western portion of the VASNHCS campus, but does not include the campus. The northern portion of the district is bounded to the north by Roberts Street, to the east by Kirman Avenue, to the south by East Taylor Street, and to the west by Locust Street. The southern portion of the district is bounded to the north by Burns Street, to the east by Kirman Avenue, to the south by Wander Street, and to the west by Locust Street.

- The Belli Addition Historic District (SHPO Resource D190). This district is eligible for listing in the NRHP as an important example of masonry mid-twentieth century style architecture from 1940 through 1965. As a whole, the subdivision retains very good integrity, particularly the continuity of architectural design, and represents an important period in the history of Reno's suburban growth and development of multi-family housing. Most of the housing developed in the Belli Addition was rental units, perhaps geared to the divorce and gaming industries, as well as employees at the VA hospital. This district is located north of the eastern portion of the VASNHCS campus and is bounded by Roberts Street to the north, Wilkinson Avenue to the east, Belli Drive to the south, and Kirman Avenue to the west.

The boundaries of the NRHP-eligible historic districts are depicted on Figures 7 and 8.

The cultural resource assessments included an archaeological evaluation and determined that it is unlikely that significant archaeological resources are present at the VASNHCS campus.

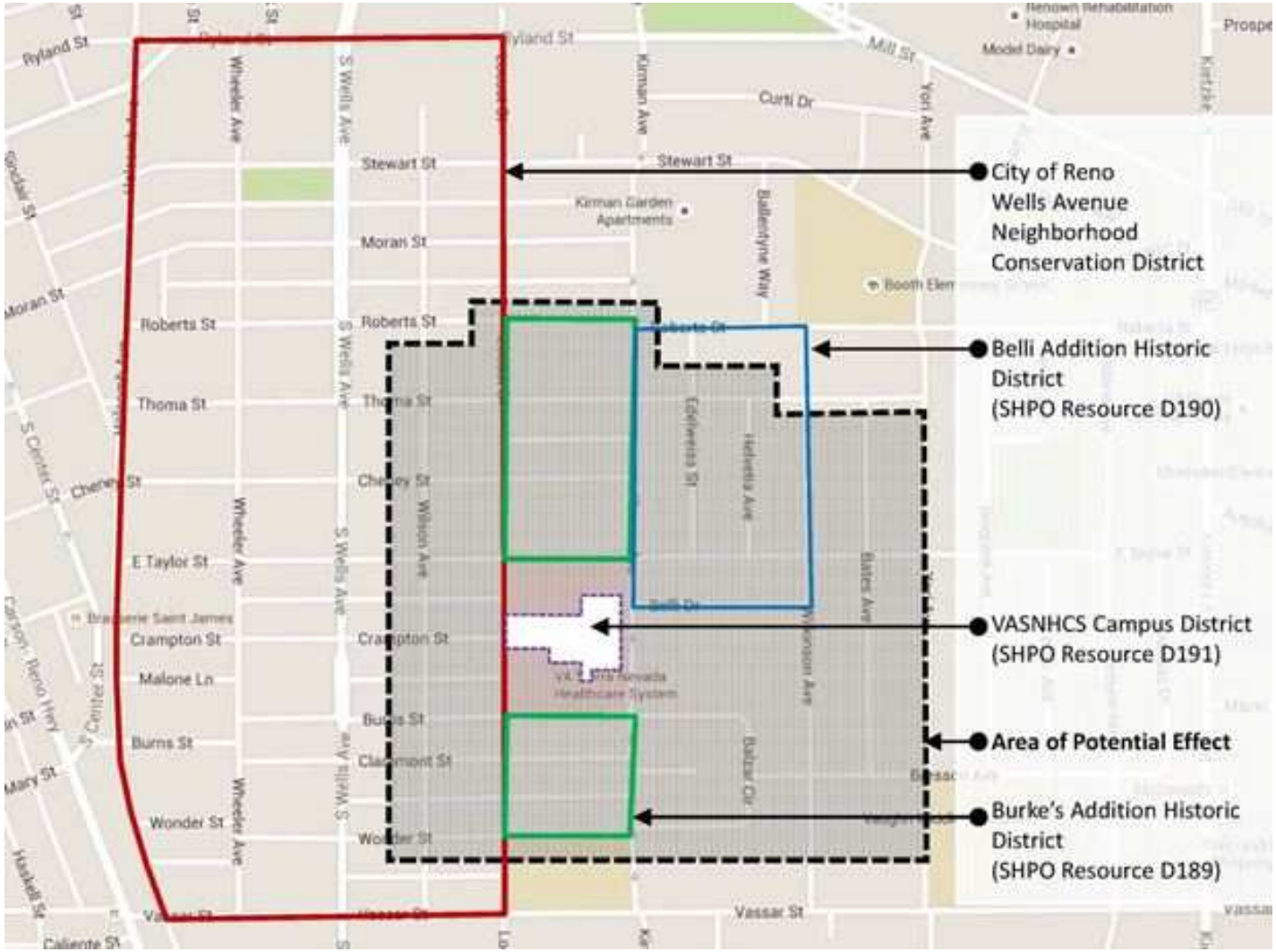

FIGURE 7
AREA HISTORIC DISTRICTS

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PROPOSED VASNHCS CAMPUS RENOVATION AND MODERNIZATION
RENO, NEVADA

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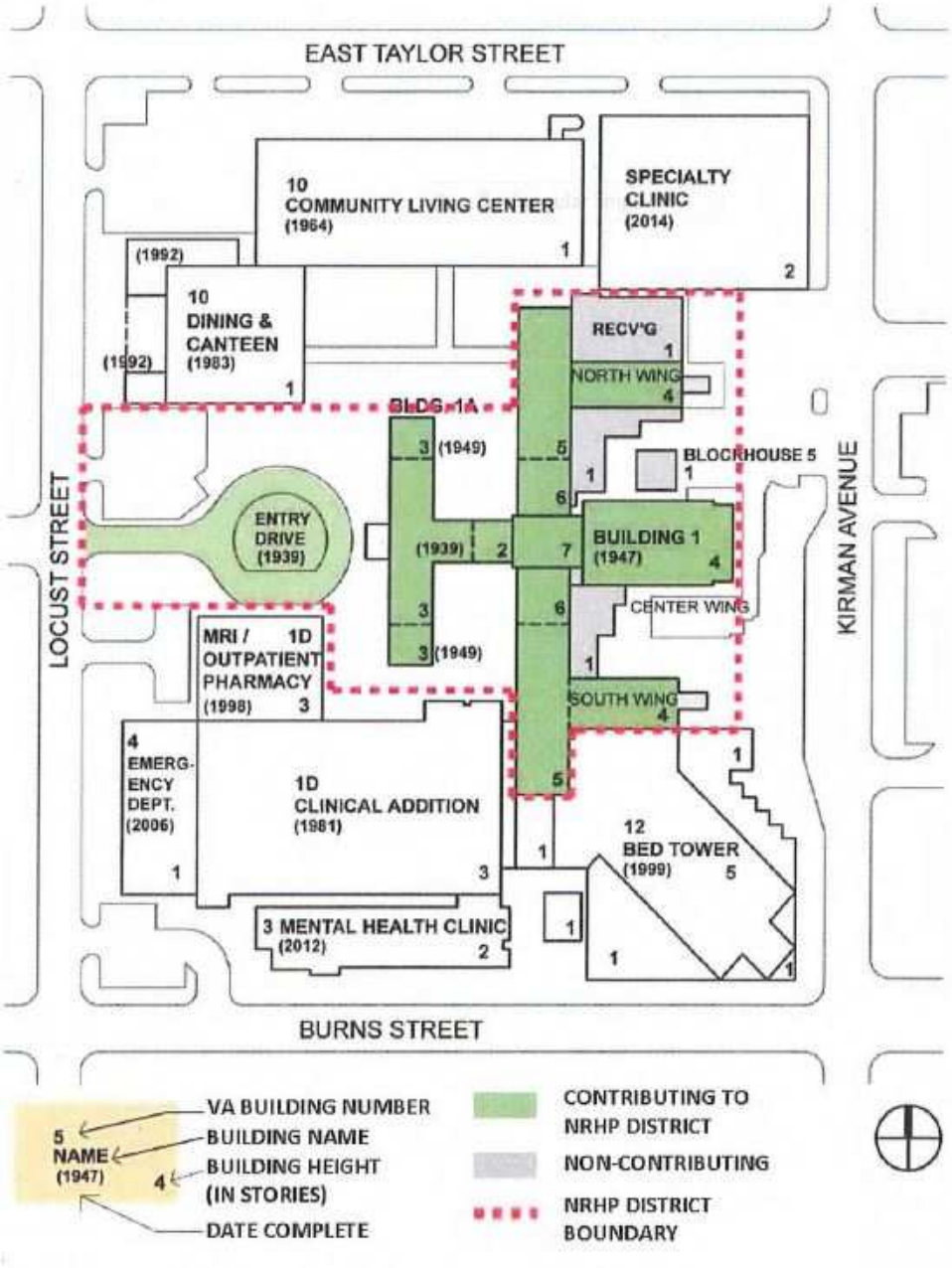

FIGURE 8
VASNHCS CAMPUS HISTORIC DISTRICT

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3.4.2 Native American Consultation/Coordination

For proposed actions, Federal agencies are required to consult with Federally-recognized Native American Tribes in accordance with the NEPA, NHPA, NAGPRA, and EO 13175. VA consulted with 13 Federally-recognized Native American tribes as part of this NEPA process, in accordance with 36 CFR 800.2 and EO13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000. These tribes, identified as having possible ancestral ties to the area as identified by the SHPO and/or the Native American Consultation Database (NACD), were invited by VA to participate in the EA process as Sovereign Nations per EO 13175. A list of the tribes that were consulted is provided in Section 10. As of the date of this EA, no responses have been received from the tribes (VA 2016).

3.4.3 Effects of the Proposed Action Alternative

The Proposed Action would have a less-than-significant adverse effect to cultural resources. None of the Proposed Action projects would alter or directly affect the components of the VASNHCS Campus Historic District or the off-campus historic districts. The Proposed Action would result in less-than-significant indirect adverse effects to the historic districts by altering the appearance of the VASNHCS campus.

In February 2016, VA submitted Section 106 of the NHPA consultation letters to SHPO for the proposed new CLC, proposed demolition of existing east campus buildings, and the proposed new parking structure in the southeastern portion of the campus. These are the primary construction projects of the Proposed Action (the projects most likely to have an adverse cultural resource effect) and are projects proposed to begin prior to the other Proposed Action projects. The consultation letters described the proposed project, VA's analysis of the potential cultural resources effects, and VA's determination that the projects would have no adverse effect on cultural resources. In letters dated April 15, 2016 and April 19, 2016, SHPO concurred with VA's determination that these projects would have no adverse effects on historic properties. The SHPO concurrence letters are included in Appendix A.

VA is currently working with the SHPO and ACHP to establish a Programmatic Agreement (PA) and/or other regulatory mechanisms to address VA's Section 106 consultation requirements for the remaining Proposed Action projects and other future projects associated with the renovation and modernization of the campus. The Draft PA was submitted to SHPO on July 7, 2016. The PA will establish a stream-lined process for Section 106 consultation. The PA establishes a list of possible VA activities that would have limited or no potential to affect historic properties and would require no further Section 106 consultation. Activities such as the Proposed Action interior renovations are included on this list. Activities not included on the list would require VA assessment of potential adverse effects to historic properties. Projects determined to have no adverse historic property effects would be documented in an annual report submitted to SHPO. If VA determines that a proposed project would have an adverse effect to historic properties, VA will notify SHPO of the potential adverse effects with a proposed mitigation plan for review and concurrence. The PA also describes other procedures and requirements, such as required actions in the event of the discovery of an unanticipated archaeological site and reporting requirements.

3.4.4 Cumulative Impacts

The VASNHCS campus and surrounding area includes four NRHP-eligible historic districts that could be adversely affected by the Proposed Action and other planned projects at the VASNHCS campus. However, VA has determined and SHPO has concurred that the primary Proposed Action construction projects would have no adverse effect on historic properties. The remaining Proposed Action projects also are not anticipated to have an adverse effect on historic properties. As such, the Proposed Action would not contribute to cumulative cultural resource impacts.

VA has had on-going consultation with the SHPO regarding the Proposed Action, the Land Acquisition and Kirman Avenue Modification Project, the Building 1 Seismic Upgrade and Clinical Expansion Project, and other more distant potential future VASNHCS campus projects. Through this process, VA had addressed/is addressing individual projects as well as the comprehensive planned transformation of the VASNHCS campus, thereby addressing potential cumulative impacts.

The residential land acquisition project could result in an adverse effect to the Belli Addition Historic District as some of the structures proposed for acquisition and demolition contribute to the historic district. In consultation with SHPO, VA developed a plan to mitigate cultural resource effects associated with the Land Acquisition and Kirman Avenue Modification Project. The mitigation measures have been formalized in a Draft Memorandum of Agreement (MOA) between VA and SHPO and other interested parties.

The Building 1 Seismic Upgrade and Clinical Expansion Project would result in a visual change to the western portion of the VASNHCS campus and VA, in consultation with SHPO, has concluded that this project would adversely affect the VASNHCS Campus Historic District. In consultation with SHPO, VA has developed and finalized a MOA to mitigate cultural resource effects associated with the Building 1 Seismic Upgrade and Clinical Expansion Project.

Future projects at the VASNHCS will be addressed through the PA and/or other regulatory mechanisms agreed upon by VA and SHPO. Compliance with the PA and these other mechanisms will ensure that significant cultural resources impacts, if any, would be mitigated.

3.4.5 Effects of the No Action Alternative

Under the No Action Alternative, no activities by VA would occur and there would be no cultural resources impacts.

3.4.6 Mitigation/Management Measures

No project-specific mitigation measures are anticipated to be required for the Proposed Action; VA and SHPO have determined that the primary construction/demolition projects of the Proposed Action would not adversely affect historic properties. VA would ensure that the Proposed Action would have no significant cultural resource effects by:

- Finalizing the PA and/or other Section 106 regulatory mechanisms in conjunction with SHPO and ACHP and complying with their requirements.

In addition, implementing BMPs to reduce impacts during construction would further minimize potential impacts to local cultural resources. All contractors involved in site preparation and ground disturbing construction would 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 would immediately cease work until VA, a qualified archaeologist and the SHPO are contacted to properly identify and appropriately treat discovered items.

3.5 Geology and Soils

According to the Physiographic Regions of the US, dated 2003 and published by the United States Geological Survey (USGS), the City of Reno is located near the western boundary of the Basin and Range physiographic province and is characterized by Cenozoic continental deposits, early and late Cenozoic volcanic rocks, and Mezozoic granite rocks. The area is located in the Washoe Valley, resulting from enormous volumes of material (i.e., sediment) that were eroded from the surrounding mountains beginning in middle Miocene time period (about 17 million years before present), including an average sediment thickness of about 2,000 feet.

The Basin and Range physiographic province is characterized by lithospheric (crust and upper mantle) extension and thinning. Data suggest that a discontinuity in the earth's crust and upper mantle associated with the San Andreas Fault caused vertical thinning and horizontal extension in the Basin and Range physiographic province (Earth System History, S.M. Stanley, 2005). As a result, the Reno area is proximal to several fault lines and is classified as seismically active. Fault lines in the region include the Sierra Nevada Frontal fault system and the Mount Rose, the Spanish Springs Valley, the Peavine Peak fault zones, located at least three miles from the VASNHCS campus. However, these fault zones are not known to be currently active and the VASNHCS campus area has not been designated as an earthquake fault zone.

The Reno, Nevada USGS Topographic Quadrangle (dated 2015) indicates that surficial topography at the VASNHCS campus area [elevation approximately 4,460 feet above mean sea level (amsl)] gently slopes down to the southeast. The nearest surface water body is the Truckee River, located approximately 4,300 feet north of the campus.

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, the VASNHCS campus contains two soil types identified as Washoe gravelly sandy loam, 0 to 4 percent slopes (majority of campus) and Oest bouldery sandy loam, 2 to 8 percent slopes (northwest portion of campus). These soils are characterized as well drained soils with moderately high to high permeability and water table greater than 80 inches below ground surface (bgs). Site soils are shown on Figure 9.

According to a water well log for 801 Belli Drive, provided by the Washoe County Health District (WCHD), the soils in the site vicinity consist of sandy clay and rock from the ground surface to at least 272 feet bgs and intervals of sand and gravel and sandy clay from 272 to 320 feet bgs.

Previous subsurface explorations in the vicinity of the VASNHCS campus identified medium dense to very dense sandy soil with gravel, cobbles, and boulders (Kleinfelder, 2016).

3.5.1 Prime and Unique Farmland Soils

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

3.5.2 Soil Erosion and Stormwater Management

The City of Reno has been granted a National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system (MS4) permit which authorizes the discharge of municipal storm water runoff associated with construction and operation of public and private projects to the receiving waters of the Truckee River. It also requires the continued administration, implementation, and enforcement of a Storm Water Management Plan (SWMP) to mitigate pollution in stormwater runoff within the Truckee Meadows MS4 permit area. NDEP has issued a General Permit for Stormwater Discharges Associated with Construction Activity (NVR100000) which details specific requirements for owners and operators of applicable private and public construction sites to control erosion, sediment and waste discharges to the municipal storm drain system. Construction projects that propose to disturb more than one acre of the ground surface must obtain an NPDES permit and comply with the NPDES requirements. The NPDES permitting process is administered by the Truckee Meadows Stormwater Quality Management Program (TMSQMP) and includes specific details regarding construction site BMPs, structural controls, and low impact development (LID) practices.

3.5.3 Effects of the Proposed Action Alternative

No significant changes to topography or drainage at the VASNHCS campus would be expected as a result of the Proposed Action. The construction projects associated with the Proposed Action would be designed and implemented in concert with the site's current topography and drainage and would be designed and implemented to drain to the municipal stormwater system.

All of the soils on the VASNHCS campus are classified as farmland of statewide importance. However, based on the current use of the site as a fully developed medical campus within an urban area of the City of Reno, there would be no loss of prime farmland soils due to the Proposed Action. In addition, the VASNHCS campus is located in a designated urban area and is exempt from the FPPA requirements.

Less-than-significant impacts to geology are anticipated. Based on currently available data, no active significant faults are known to occur in the VASNHCS campus area and the area has not been designated as an earthquake fault zone. As such, no impacts associated with seismic hazards are identified. No significant impacts to mineral resources 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.

During demolition and construction, less-than-significant, direct and indirect, short-term adverse soil erosion and sedimentation impacts would be possible as the construction projects associated with the Proposed Action are implemented. Demolition and construction would disturb the soil surface. The exposed soil would then be susceptible to erosion by wind and surface runoff. Exposure of the soils during demolition and construction has the potential to result in off-site discharges of sediment-laden runoff. However, such potential adverse erosion and sedimentation effects would be prevented through utilization of appropriate BMPs and adherence to the terms of the NPDES General Permit for Construction Activity permit.

Once demolition and construction are complete, no long-term erosion and sedimentation impacts would be anticipated due to the nature of the Proposed Action. Existing Proposed Action construction areas are almost entirely covered with impervious surfaces and will remain so following the completion of the Proposed Action. Stormwater collection and runoff would be controlled by an appropriately designed stormwater system, to be included as part of final Proposed Action project design.

3.5.4 Cumulative Impacts

The VASNHCS campus is fully developed with mostly impervious surfaces. The Proposed Action projects and other planned VASNHCS projects would include general BMPs and management measures to control erosion and sedimentation. As such, no significant adverse cumulative soil and erosion impacts are anticipated.

3.5.5 Effects of the No Action Alternative

Under the No Action Alternative, no demolition, construction, or renovation by VA would occur and there would be no impacts to soil, topography or geology.

3.5.6 Mitigation/Management Measures

No significant adverse geology and soil impacts are anticipated and no project-specific mitigation measures are required.

Implementing BMPs to reduce erosion and sedimentation impacts during construction would further minimize the potential impacts on local soils and water quality. VA would design site improvements in accordance with the requirements of EO 13514/EISA Section 438 with respect to stormwater runoff quantity and characteristics.

VA would develop, submit to the TMSQMP, and have approved, a NPDES General Permit for Construction Activity for the implementation of the Proposed Action construction and demolition activities. The NPDES permit would require storm water runoff and erosion management through structural controls, LID practices, earth berms, detention basins, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the following as appropriate and necessary to protect surface water quality, as part of NPDES permit:

- Implement sediment and erosion control measures as required by the NPDES permit.
- Install and monitor erosion-prevention measures, such as silt fences and water breaks,

detention basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil; and seed/re-vegetate areas temporarily cleared of vegetation.

- Retain on-site vegetation to the maximum extent possible.
- Plant and maintain soil-stabilizing vegetation on disturbed areas.
- Use native vegetation to re-vegetate disturbed soils.

The construction contractor would obtain all required permits before any proposed construction activities commence and would adhere to permit conditions during all onsite construction activities.

If measures in the NPDES permit are approved and correctly utilized for site development, direct soil erosion and resulting indirect sedimentation impacts would be minimized to less-than-significant levels. Successful implementation of these measures would ensure that the Proposed Action is in compliance with State and Federal water quality standards and minimizes both the short- and long-term potential for erosion and sedimentation.

FIGURE 9
SOILS MAP

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PROPOSED VASNHCS CAMPUS
RENOVATION AND MODERNIZATION
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3.6 Hydrology and Water Quality

3.6.1 Surface Waters

The VASNHCS campus is located in the Truckee River Watershed. Stormwater runoff from the campus infiltrates into onsite soils or discharges into the municipal storm sewer system. The nearest surface water body to the campus is the Truckee River, located approximately 4,300 feet north. No surface water features are located at the VASHNCS campus or the surrounding properties.

3.6.2 Groundwater

According to the Groundwater Atlas of the United States, the VASNHCS campus is not underlain by significant usable aquifers. However, Basin-Fill aquifers are regionally located around Reno and are characterized by unconsolidated sand and gravel of Quaternary and Tertiary age. The water well log for 801 Belli Drive, provided by the WCHD, indicated that the well is screened from 271 to 320 feet bgs, and the static groundwater level was 270 feet bgs. According to a NDEP Complaint/Spill Report Form for 805 Belli Drive, dated January 14, 2002, shallow groundwater in the vicinity of the Site parcels is anticipated to be between 20 and 21 feet bgs.

3.6.3 Effects of the Proposed Action Alternative

The Proposed Action would not result in significant adverse impacts to surface water resources, provided the BMPs described in Sections 3.5.6 and 3.6.6 are implemented. These BMPs would control construction-related impacts of soil erosion and sedimentation, and would provide a proper onsite storm water management system. These practices would prevent adverse impacts to surface waters near the VASNHCS campus.

The Proposed Action would have less-than-significant impacts to groundwater quality. It is not anticipated that groundwater would be encountered during the construction activities or that excavation dewatering would be required. No groundwater use is planned as part of the Proposed Action.

3.6.4 Cumulative Impacts

The VASNHCS campus is already fully developed with mostly impervious surfaces, and the Proposed Action projects and other planned VASNHCS projects would include general BMPs and management measures to control erosion and sedimentation and surface water impacts. As such, cumulative surface water impacts would be less-than-significant.

3.6.5 Effects of the No Action Alternative

Under the No Action Alternative, no demolition, construction, or renovation by VA would occur and there would be no impacts to hydrology and water quality.

3.6.6 Mitigation/Management Measures

No adverse hydrology and water quality impacts are anticipated and no mitigation measures are required.

To minimize potential adverse impacts to surface waters in the site area, VA would implement the following BMPs:

- VA would implement BMPs to reduce erosion and sedimentation impacts during construction as described in Section 3.5.6.
- VA would ensure that the Proposed Action design includes sufficient stormwater management so as not to adversely affect the flood elevations or water quantity/quality of downstream receiving waters. Post-project hydrology shall replicate pre-project hydrology through the appropriate engineering design and implementation of a stormwater management system at the site.
- Site improvements would be designed in accordance with the requirements of EO 13514/EISA Section 438 with respect to stormwater runoff and characteristics.

Implementation of these BMPs would ensure identified water resources impacts are maintained at less-than-significant levels.

3.7 Wildlife and Habitat

3.7.1 Vegetation and Wildlife

The VASNHCS campus is fully developed with buildings, paved areas, and limited landscaping. No natural vegetation communities supportive of wildlife species are present on the VASNHCS campus. The lands immediately adjacent to the VASNHCS campus are fully developed with residential land uses. Vegetative communities are not likely to support wildlife; the surrounding lands are likely to support minimal wildlife species associated with urban areas in the City of Reno.

Vegetation and landscaping are managed by the City of Reno through the Chapter 8.32 (Trees and Shrubs), Chapter 18.12 (General Development and Design Standards), and Chapter 18.08 (Zoning) of the RLDC.

3.7.2 Threatened and Endangered Species

As part of the preparation of this EA, the US Fish and Wildlife Service (USFWS), Reno Fish and Wildlife Office (RFWO), NDEP, and Nevada Department of Conservation and Natural Resources (NDCNR), Natural Heritage Program (NHP) were contacted to identify any potential for presence of State or Federally-listed threatened or endangered species on or in the vicinity of the VASNHCS campus.

According to the USFWS RFWO, information pertaining to threatened, endangered, and candidate species and critical habitat can be obtained from the USFWS Information, Planning, and Conservation System (IPAC) internet website. According to the USFWS IPAC website, one Federally-listed endangered fish species, one Federally-listed endangered plant species, and

one Federally-listed endangered insect species are known to occur within Washoe County, Nevada. Two Federally-listed threatened fish species and one Federally-listed threatened plant species are known to occur within Washoe County. In addition, two Federally-listed candidate bird species and one Federally-listed candidate bird species are known to occur within Washoe County. Based on the lack of natural habitat at the VASNHCS campus and immediate surrounding area, none of the identified species are likely to be present.

The NDCNR NHP stated that there are no recorded "at risk" species in the vicinity of the VASNHCS campus. However, the NDCNR NHP stated that there is potential habitat for the Tricolored Blackbird, a species classified as Critically Imperiled, and the Spotted Bat, a species classified as a Nevada Bureau of Land Management (NBLM) Sensitive Species. The NDCNR recommended that VA consult with the Nevada Department of Wildlife (NDOW) for additional information.

According to the NDOW internet website, Tricolored Blackbird habitats include annual grasslands, wet and dry vernal pools, and other seasonal wetlands. Spotted Bat habitats include wetlands, riparian, rock, cliff, desert, shrubland, grassland, or woodland habitats usually near a permanent water source. They roost in caves and rock crevices mainly, but may also occasionally use mines, caves, and buildings as roost sites. Based on the habitat requirements for these species and the developed nature of the VASNHCS campus and surrounding area, it is unlikely that these species are present.

3.7.3 Effects of the Proposed Action Alternative

The Proposed Action at the VASNHCS campus would have less-than-significant adverse effects on biological resources. The Proposed Action construction activities may include the removal of small landscaped areas; however, no special status species are anticipated to occur in these areas.

Based on the habitat requirements of the Federally-listed and State-listed special status species for Washoe County and the highly developed, urban nature of VASNHCS campus and surrounding area, these species are not likely to be present in the area or affected by the Proposed Action.

3.7.4 Cumulative Impacts

Based on the highly developed, urban nature of the VASNHCS campus and surrounding area, no significant cumulative wildlife or habitat effects are anticipated with the Proposed Action in conjunction with the other planned VASNHCS projects.

3.7.5 Effects of the No Action Alternative

Under the No Action Alternative, no demolition, construction, or renovation by VA would occur. No impacts to biological resources would occur.

3.7.6 Mitigation/Management Measures

No mitigation measures are required. VA would implement the following BMPs to reduce biological resources impacts during construction and operation:

- Native species would be used to the extent practicable when re-vegetating land disturbed by facility construction to avoid the potential introduction of non-native or invasive species per the requirements of EO 13112.

- Incorporate pollinator friendly practices based on CEQ's *Supporting the Health of Honey Bees and other Pollinators* when designing landscaped areas.

- VA would comply with, to the extent practicable, Chapter 8.32 (Trees and Shrubs), Chapter 18.12 (General Development and Design Standards), and Chapter 18.08 (Zoning) of the RLDC.

3.8 Noise

The existing noise environment around the VASNHCS campus is dominated by vehicle traffic along Kirman Avenue. Locust Street, and East Taylor Street, and to a lesser degree, Belli Drive, Wilkinson Avenue, Burns Street, and Balzar Circle. In addition, the operations and equipment associated with the VASNHCS play a noticeable role in the noise environment in the vicinity of the VASNHCS campus. No other notable noise-generating sources are present in the immediate vicinity of the VASNHCS campus. As such, the noise environment of the site can be characterized as that typical of a primarily residential, urban area.

The City of Reno maintains Ordinance 6286 (Noise Ordinance). The ordinance prohibits any continuous noise above 65 decibels (dB). The ordinance also limits times of construction activities to between 6:00 am and 7:00 pm.

3.8.1 Effects of the Proposed Action Alternative

Noise generated from the Proposed Action would have short-term impacts to the existing noise environment due to the demolition, construction, and some of the renovation activities at the VASNHCS campus. Noise generating sources during demolition, construction, and renovation activities would be associated primarily with standard construction equipment and construction equipment transportation. These increased noise levels could directly affect the neighboring area, including the residential properties located in the vicinity of the VASNHCS campus.

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

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels

in the range of 93 to 108 dBA (decibels, A-weighted scale) would occur on the active construction site, decreasing with distance from the construction area. Table 1 presents peak noise levels that could be expected from a range of construction equipment during proposed demolition and construction activities.

Generally speaking, peak noise levels within 50 feet of active demolition and construction areas and material transportation routes would most likely be considered “striking” or “very loud”, comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud - approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25 mile, demolition, construction, and renovation noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times.

Combined peak noise levels, or worst-case noise levels when several loud pieces of equipment are used in a small area at the same time as described in Table 1, are expected to occur rarely, if ever, during a project. However, under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the demolition and construction areas, depending on equipment being used.

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

Areas that could be most affected by noise from demolition and construction activities include those closest to the construction footprint, including the VASNHCS campus and surrounding residential neighborhoods. Veterans Memorial Elementary School, located approximately 600 feet south of the VASNHCS campus, and Bailey Charter Elementary School, located approximately 600 feet southeast of the campus, would be less affected by noise from the Proposed Action. Indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels.

Indirect impacts during demolition and construction include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes) transit to and from the site. Because trucks are present during most phases of demolition and construction and would enter and exit the site via local thoroughfares, truck noises tend to impact more people over a wider area. For this Proposed Action, persons in the residential areas near the VASNHCS campus would experience temporary increases in truck traffic noise during day-time hours. These effects are not considered to be significant because they would be temporary, intermittent, and similar to existing traffic noise levels in the area.

Table 1. Peak Noise Levels Expected from Typical Construction Equipment

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

Worst-Case Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)					
	Distance from Source (feet)				
Combined Peak Noise Level	50	100	200	¼ Mile	½ Mile
	103	97	91	74	68

Source: Tipler 1976

Upon completion of the Proposed Action, vehicle traffic to and from the campus would comprise the majority of the noise environment around the VASNHCS campus; similar to existing conditions. Vehicle traffic using the proposed new parking structure would not produce excessive noise. Vehicles that would use the parking structure currently park on the streets in the residential neighborhoods around the VASNHCS campus. The Proposed Action is estimated to increase traffic to the VASNHCS by approximately 80 vehicles per day. As such, the Proposed Action would produce less-than-significant adverse noise impact on surrounding land uses.

3.8.2 Cumulative Impacts

Based on proximity and timing, the Proposed Action could have cumulative short-term noise impacts during construction, in conjunction with the other planned VASNHCS construction projects. Cumulative noise impacts after construction, during routine medical center operation, would remain at approximate current levels.

Peak noise levels would occur in the active construction areas and would decrease with distance away from these active areas. VA would implement general BMPs to reduce noise during each of its construction projects, as outlined in Section 3.8.4, which would maintain cumulative noise impacts as less-than-significant levels. Upon completion of the various planned VASNHCS projects, vehicle traffic to and from the campus would comprise the majority of the noise around the VASNHCS campus; similar to existing conditions. The increased vehicle traffic to the campus as a result of the planned projects would not produce excessive noise; noise levels would be consistent with existing noise levels in the area. As such, the cumulative noise impacts of the Proposed Action and the other planned VASNHCS projects would be less-than-significant on surrounding land uses.

3.8.3 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment surrounding the VASNHCS campus would not change. The VASNHCS campus would continue its current operations.

3.8.4 Mitigation/Management Measures

No significant adverse noise impacts are anticipated and no project-specific mitigation measures are required.

Implementing BMPs to reduce noise generated during demolition and construction would further minimize the potential impacts on the local noise environment. To minimize the potential for adverse, short-term noise impacts, the contractor would implement the following typical noise control BMPs, as applicable. These measures would be briefed to the contractor at a kick-off meeting and daily at tailgate safety meetings. The onsite construction manager would be responsible to immediately address noise issues, if they arise. These BMPs include:

- Comply with the City of Reno Noise Ordinance, to the extent practicable.
- Make best efforts to conduct demolition and construction activities between the hours of 6:00 am and 7:00 pm, Monday through Saturday.
- Limit construction activities on Sundays.
- Coordinate proposed construction activities in advance with adjacent sensitive receptors. Let the local residents know what operations would be occurring at what times, including when they would start and when they would finish each day. Post signage, updated daily, at the entry points of the site providing current construction information, including schedule and activity.
- Locate stationary equipment as far away from sensitive receptors as possible.
- Select material transportation routes as far away from sensitive receptors as possible.
- Shut down noise-generating heavy equipment when it is not needed.
- Maintain noisy equipment per manufacturer’s recommendations.

- Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.).

Implementation of these BMPs would reduce the potential for short-term adverse noise impacts to acceptable levels, notably for nearby sensitive receptors (nearby residents and schools).

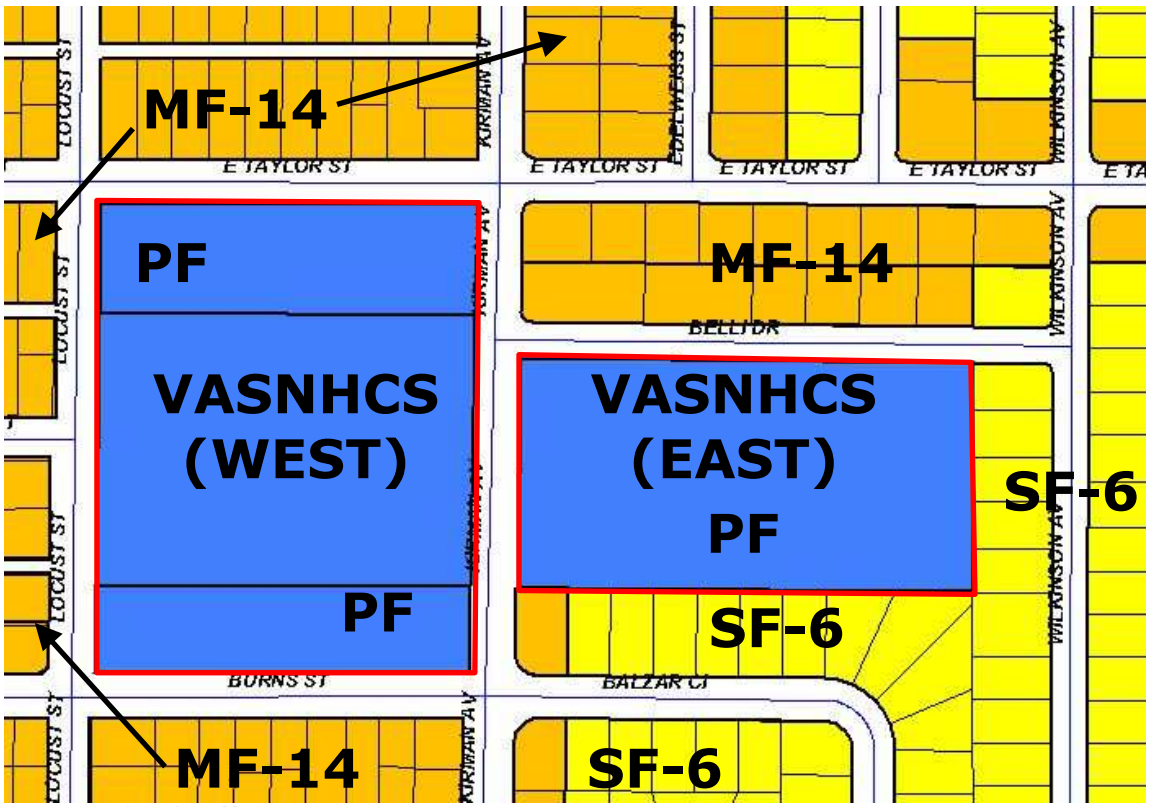
3.9 Land Use

The VASNHCS campus is located in an urban, fully developed area approximately 1.2 miles southeast of the center of the City of Reno. The approximately 12.5-acre VASNHCS campus is divided into eastern and western portions by Kirman Avenue. The eastern portion of the VASNHCS campus is generally bounded by Kirman Avenue to the west, Belli Drive to the north, residential properties along the west side of Wilkinson Avenue to the east, and residential properties on the north side of Balzar Circle to the south. The eastern portion of the VASNHCS campus currently includes a two-story parking garage, the VASNHCS Boiler Plant, several small VASNHCS support buildings and limited surface-level parking. The western portion of the VASNHCS campus is generally bounded by East Taylor Street to the north, Kirman Avenue to the east, Burns Street to the south, and Locust Street to the west. The western portion of the VASNHCS campus contains the campus medical facilities and administrative offices and includes the main hospital building, other medical buildings, and four small surface-level parking lots.

The western portion of the VASNHCS campus is adjoined to the north across East Taylor Street to the south across Burns Street, and to the west across Locust Street by residential properties, and to the east across Kirman Avenue by the eastern portion of the VASNHCS campus and residential properties. The eastern portion of the VASNHCS campus is adjoined to the north across Belli Drive, to the east and south by residential properties, and to the west across Kirman Avenue by the western portion of the VASNHCS campus.

The City of Reno, Building, Planning, and Engineering Department (RBPED) is responsible for long-range planning and zoning. According to the RBPED, the VASNHCS campus is located on land zoned Public Facility (PF). The properties surrounding the VASNHCS campus are zoned Multi-Family Residential (MF-14) and Single-Family Residential, 6,000 square feet (SF-6). Current zoning designations for the VASNHCS campus and the surrounding area are depicted on Figure 10.

The City of Reno also identified the VASNHCS area as a Special Planning Area, which allows any individual land use, or land uses in combination, that are compatible and complementary within the project boundaries and with adjoining properties (City of Reno Land Development Code, Chapter 18.08 – Zoning).



PF – PUBLIC FACILITY
MF-14 – MULTI-FAMILY RESIDENTIAL, 14 UNITS PER ACRE
SF-6 – SINGLE-FAMILY RESIDENTIAL, 6,000 SQUARE FEET

FIGURE 10
ZONING MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS CAMPUS
RENOVATION AND MODERNIZATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS

TTL PROJECT NO.
12181.03

TTL associates inc
Environmental, Geotechnical Engineering & Testing

3.9.1 Effects of the Proposed Action Alternative

The Proposed Action would result in less-than-significant land use effects within the vicinity of the VASNHCS campus. The VASNHCS campus is used as a medical facility with support buildings, such as the Boiler Plant and a parking structure on the eastern portion of the campus, consistent with current zoning. The Proposed Action includes projects that will renovate and modernize the existing campus; the overall use of the campus will not change and will remain consistent with local zoning. Although, as a Federal agency, VA is not subject to local zoning regulations or restrictions, the Proposed Action projects would be designed and implemented in consonance with local plans and in accordance with local building codes to ensure they are consistent with other VASNHCS and surrounding area developments. No adverse on-site building function or architecture impacts are anticipated.

3.9.2 Cumulative Impacts

The Proposed Action, in conjunction with the other planned VASNHCS projects, would have less-than-significant land use effects as land use at the VASNHCS and surrounding area would mostly remain unchanged. Small residential parcels that adjoin the VASNHCS campus would be acquired and redeveloped with surface parking as part of the Site Acquisition and Kirman Avenue Modification Project; however, this change in land use is generally consistent with the VASNHCS campus.

3.9.3 Effects of the No Action Alternative

Under the No Action Alternative, no land use impacts due to VA's Proposed Action would occur.

3.9.4 Mitigation/Management Measures

No project-specific mitigation or management measures are required.

3.10 Wetlands, Floodplains, and Coastal Zone Management

3.10.1 Wetlands

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

No surface water features (or wetlands) were identified on or adjacent to the VASNHCS campus during the site reconnaissance. The USFWS Online Wetland Mapper indicated that no mapped wetlands are located on or near the VASNHCS campus.

3.10.2 Floodplains

According to available FEMA floodplain mapping, the VASNHCS campus and surrounding areas are not located in the 100-year or 500-year floodplain (FEMA Flood Insurance Rate Map No. 32031C3043G, dated March 16, 2009).

3.10.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA of 1990, as amended (16 USC 1451 *et seq.*) encourages States to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats. The State of Nevada does not participate in the National Coastal Zone Management Program (CZMP). The VASNHCS campus is not included in a designated coastal zone.

3.10.4 Effects of the Proposed Action Alternative

No wetlands were identified on or near the VASNHCS campus. In addition, the VASNHCS campus is not included in the 100-year or 500-year floodplain or a designated coastal zone. No impacts to wetlands, floodplains, or coastal zones would occur with the implementation of the Proposed Action.

3.10.5 Cumulative Impacts

No cumulative impacts to wetlands, floodplains, or coastal zones would occur with the implementation of the planned VASNHCS projects.

3.10.6 Effects of the No Action Alternative

No impacts to wetland, floodplains, or coastal zones would occur.

3.10.7 Mitigation/Management Measures

No mitigation or management measures are required.

3.11 Socioeconomics

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

3.11.1 Demographics

The City of Reno's estimated population in 2015 was 241,445 citizens. Washoe County's estimated population in 2015 was 446,903 citizens. The estimated population total for Nevada was 2,890,845 residents in 2015. Population totals for the City of Reno, Washoe County, and Nevada have increased from 1990 to 2015 (see Table 2).

Table 2. Population Totals for the City of Reno, Washoe County, and Nevada			
Area	**1990**	**2000**	**2015 (estimates)**
Nevada	1,201,833	1,998,257	2,890,845
Washoe County	254,667	339,486	446,903
City of Reno	134,747	183,973	241,445
Sources: US Census Bureau, 2010 Census and 2015 Estimates, Profile of General Demographic Characteristics.			

Baseline information identified that the City of Reno and Washoe County have lower minority populations than the State of Nevada as a whole (Table 3).

Table 3. Regional Population by Race and Ethnicity							
Area	**All Individuals**	**White (%)**	**African-American (%)**	**American Indian and Alaska Native (%)**	**Asian or Pacific Islander (%)**	**Other Race (%)**	**Hispanic or Latino* (%)**
Nevada	2,890,845	76.7	9.0	1.6	8.8	3.9	27.5
Washoe County	446,903	85.7	2.6	2.1	6.4	3.2	23.3
City of Reno	241,445	74.2	2.9	1.3	7.0	4.2	24.3
Note: People of Hispanic or Latino origin may be of any race. Note: The six percentages reported by the US Census Bureau for each geographic region may total more than 100% because individuals may report more than one race. Source: US Census Bureau, 2010 Census and 2015 Estimates, Profile of General Demographic Characteristics.							

The City of Reno, Washoe County, and the State of Nevada have similar educational attainment levels. Educational attainment data are presented in Table 4.

Table 4. Educational Attainment: City of Reno, Washoe County, and Nevada			
Educational Attainment	**City of Reno**	**Washoe County (%)**	**Nevada (%)**
High school graduate (incl. equivalency)	85.7	86.9	84.6
Bachelor's degree or higher	28.9	27.3	22.4
Source: US Census Bureau, 2010 Census and 2014 Estimates, Profile of General Demographic Characteristics.			

3.11.2 Employment and Income

The Reno – Sparks, Nevada metropolitan area employment is distributed amongst the following types of occupations (greatest number of jobs to least number of jobs): arts, entertainment, and recreation; accommodation and food services; healthcare; education services; construction; and professional, scientific, and technical services (Bureau of Labor Statistics, January 2015).

The unemployment rates for the City of Reno and Washoe County were slightly lower than the State of Nevada as a whole in March 2016 (see Table 5). Median household incomes were

slightly lower in the City of Reno than Washoe County and the State of Nevada. The percent of the population below the poverty level was slightly higher in the City of Reno than Washoe County and the State of Nevada.

Table 5. Regional Income

Area	Number of Households	Median Household Income ($)	Per Capita Income ($)	Population Below Poverty Level (%)	Unemployment Rate (%) March 2016
Nevada	999,016	52,800	26,589	15.2	5.9
Washoe County	163,198	53,040	28,670	15.4	5.5
City of Reno	90,071	46,770	26,472	19.1	5.1

Source: US Census Bureau, 2010 Census and 2014 Estimates, Profile of General Demographic Characteristics.

3.11.3 Commuting Patterns

Residents of the City of Reno are largely dependent on personal automobiles for transportation to and from work. Other methods of transit include public transportation (buses), carpooling, and walking. The average commuting times in the greater Reno area was approximately 19 minutes in 2013. Public transportation for the City of Reno is provided by the Regional Transportation Commission of Washoe County (RTC). The nearest bus route to the VASNHCS is Bus Route 13, which runs north along Locust Street and south along Kirman Avenue between the eastern and western portions of the VASNHCS campus and includes stops at the VASNHCS.

3.11.4 Housing

Rates of owner-occupied housing in the City of Reno are lower than Washoe County and the State of Nevada as a whole. This is likely reflective of the more urban character of Reno relative to the rest of the county and state with an increase in renter-occupied housing. The median values of housing in the City of Reno and Washoe County are higher than the State of Nevada as a whole (see Table 6).

Table 6. Regional Housing Characteristics

Area	Total Housing Units	Occupied (%)	Owner-Occupied (%)	Median Value ($)	Renter-Occupied (%)	Median Contract Rent ($)
Nevada	1,186,879	N/A	56.7	169,100	N/A	N/A
Washoe County	185,305	N/A	58.0	203,300	N/A	N/A
City of Reno	102,582	N/A	47.4	202,100	N/A	N/A

Source: US Census Bureau, 2010 Census and 2014 Estimates, Profile of General Demographic Characteristics.

3.11.5 Protection of Children

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

Children are present in the residential neighborhoods surrounding the VASNHCS campus. The percentage of the population under age 18 is similar within the City of Reno, Washoe County, and the rest of Nevada (see Table 7).

Table 7. Total Population Versus Population Under Age 18

Area	Total Population	Population Under 18	
		Number	Percent
Nevada	2,890,845	685,130	23.7
Washoe County	446,903	101,894	22.8
City of Reno	241,445	55,050	22.8

Source: US Census Bureau, 2010 Census and 2014 Estimates, Profile of General Demographic Characteristics.

3.11.6 Effects of the Proposed Action Alternative

The Proposed Action is not anticipated to have significant adverse socioeconomic effects. The Proposed Action would provide additional temporary construction jobs in the private sector, thus providing short-term socioeconomic benefit to the area. In addition, the Proposed Action would provide minor additional long-term employment for the area through needed additional employees at the VASNHCS campus. The Proposed Action would also result in significant long-term beneficial socioeconomic impacts by providing additional parking and improved and modernized healthcare facilities and services to regional U.S. Veterans.

No significant adverse health or safety risks to children are anticipated to result from the Proposed Action. Children would only be present at the VASNHCS campus as visitors, as all Veterans are above the age of 18. Demolition, construction, and renovation areas would be secured to prevent unauthorized access by children from the nearby residential areas. The construction contractor would limit and control dust and noise, as discussed in Sections 3.3 and 3.8, thereby minimizing adverse effects to children in the area.

3.11.7 Cumulative Impacts

Cumulatively, the planned VASNHCS projects are anticipated to provide short-term and long-term socioeconomic benefit to the area through increased jobs and incidental spending. The proposed projects would provide short-term construction jobs and additional long-term employment for the area through needed additional employees at the VASNHCS campus. The

proposed projects would also result in significant long-term beneficial socioeconomic impacts by providing improved and modernized healthcare facilities and services to regional U.S. Veterans.

Socioeconomic impacts associated with the Site Acquisition and Kirman Avenue Modification Project are anticipated to be less-than-significant. VA would only acquire parcels from willing landowners through amicable negotiation and would provide relocation assistance for displaced residents and residential tenants.

3.11.8 Effects of the No Action Alternative

The No Action Alternative would result in no construction and no increased short- or long-term economic benefit due to VA's action.

Most importantly, the No Action Alternative would not enable VA to provide additional parking and improved and modernized healthcare facilities and services to regional U.S. Veterans. With a projected increase in patient stops for the VASNHCS, the No Action Alternative would exacerbate already antiquated and inadequately sized healthcare facilities, resulting in significant negative effects on hospital operations.

3.11.9 Mitigation/Management Measures

No project-specific mitigation or management measures are required.

3.12 Community Services

The VASNHCS campus is located within the Washoe County School District (WCSD). This school district includes 61 elementary schools, 14 middle schools, 17 high schools, and one online school (WCSD 2015). Schools in the vicinity of the VASNHCS campus include Veterans Memorial Elementary School (1200 Locust Street), located approximately 600 feet south of the campus; Bailey Charter elementary School (1090 Bresson Avenue), located approximately 600 feet southeast of the campus; Vaughn Middle School (1200 Bresson Avenue), located approximately 900 feet southeast of the campus; and Booth Elementary School (425 East 9th Street), located approximately 1,300 feet north of the campus. No other schools are located with 2,000 feet of the VASNHCS campus (Google Earth 2015).

The City of Reno Police and Fire Departments provide police and fire protection and emergency medical services to the VASNHCS campus area.

The City of Reno and the Nevada Department of Transportation (NDOT) provide maintenance to primary roads and bridges in the vicinity of the VASNHCS campus.

There are no developed recreational facilities in the immediate vicinity of the VASNHCS campus.

In addition to the VASNHCS campus, the Reno Regional Medical Center (1155 Mill Street) is located approximately 0.5-mile northeast of the VASNHCS campus, West Hills Hospital (1240 E. Ninth Street) is located approximately 1.3 miles north of the VASNHCS campus, and St. Mary's Regional Medical Center (235 W. Sixth Street) is located approximately 1.4 miles northwest of the VASNHCS campus. No other hospitals are located within 5 miles of the VASNHCS campus.

3.12.1 Effects of the Proposed Action Alternative

No significant additional load is expected to be placed on the fire or police departments as the result of implementing the Proposed Action. Use of other public or community services as a result of the Proposed Action is not expected. As such, the Proposed Action is expected to have a negligible impact on local public services.

3.12.2 Cumulative Impacts

Cumulatively, the Proposed Action, in conjunction with the other planned VASNHCS projects, would have less-than-significant community services effects. None of these projects are anticipated to place a significant additional load on the fire or police departments or other public or community services.

3.12.3 Effects of the No Action Alternative

Under the No Action Alternative, no demolition, construction, or renovation by VA would occur and no impacts to community services would be anticipated.

3.12.4 Mitigation/Management Measures

No project-specific mitigation or management measures are required.

3.13 Solid and Hazardous Materials

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (i.e., through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances are identified through a number of Federal laws and regulations. The most comprehensive list is contained in 40 CFR 302, and identifies quantities of these substances, when released to the environment, that require notification to a Federal agency. Hazardous wastes, defined in 40 CFR 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (e.g., solids or liquids) not otherwise excluded by 40 CFR 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR 261. Petroleum products are specifically exempted from 40 CFR 302, but some are also generally considered hazardous substances due to their physical characteristics (i.e., especially fuel products), and their ability to impair natural resources.

Environmental Data Resources, Inc. (EDR) was contracted to perform a search of ASTM-specified federal, state and tribal databases to obtain information pertaining to potential environmental concerns associated with the VASNHCS campus and surrounding properties. The VASNHCS campus was identified on the Resource Conservation and Recovery Act (RCRA) – small quantity generator (SQG), Hazardous Waste/Materials (HAZNET), and UST databases. The RCRA database is a listing of facilities that are required to register for tracking purposes due to the amount of hazardous waste generated and are not necessarily sites with reported contamination incidents. The RCRA database indicated that the VASNHCS campus has been a generator of hazardous wastes since approximately 1950. The RCRA database indicated that the VASNHCS received several administrative/informal violations associated with their RCRA status between 2000 and 2012; however, each of the violations was resolved through additional compliance inspections. The HAZNET database is a partnership between the

California EPA and the USEPA to collect information regarding the generation of hazardous wastes. The HAZNET database indicated that the VASNHCS campus generator of hazardous wastes; however, wastes are stored in bulk and then transferred to licensed waste disposal facilities.

The UST database indicates that the VASNHCS campus currently includes four USTs, including one 1,000-gallon diesel UST (installed in 1998), one 15,000-gallon diesel UST (installed in 2009), and two 10,000-gallon diesel USTs (installed in 1997 and 2013). The UST database also indicated that the VASNHCS campus formerly had two 5,000-gallon diesel USTs, one 500-gallon gasoline UST, one 4,000-gallon diesel UST, two 10,000-gallon diesel USTs, one 350-gallon diesel UST, and one 1,000-gallon diesel UST classified as "permanently out of use". None of the USTs identified at the VASNHCS campus have had reported releases from the UST systems.

EDR identified 17 properties in the vicinity of the VASNHCS on the State Hazardous Waste Site (SHWS) list due to heating oil releases, including properties adjoining to the north of the western portion of the campus (635 East Taylor Street), adjoining to the north of the eastern portion of the campus (805 Belli Drive), adjoining to the south of the eastern portion of the campus (713 Balzar Circle), and adjoining to the south of the western portion of the campus (610 and 634 Burns Street). In all cases, soil was reported as impacted and the releases received regulatory closure from NDEP.

3.13.1 Effects of the Proposed Action Alternative

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

The Proposed Action would include the removal of the diesel UST used to fuel the backup power generator on the northern portion of the campus, adjacent to Blockhouse 10, and the installation of a new replacement diesel UST. The current UST would be emptied and removed by licensed contractors following the required safety precautions to prevent a release from the UST system. Any petroleum-impacted soil encountered during the removal of the existing UST would be remediated (removed) to required applicable standards. The aged single-walled UST would be replaced with a new double-walled UST with interstitial monitoring that would enable VA to identify and address a potential future diesel release more quickly. In addition, the double-walled construction provides intrinsic secondary containment that prevents a diesel release to the environment. The replacement of the existing diesel UST with a new double-walled UST and the remediation of any identified petroleum impacts associated with the existing UST would provide beneficial soil and hazardous material effects.

Buildings that would be renovated/demolished as part of the Proposed Action may contain ACMs and LBP. Identification and abatement of the ACM that would be disturbed would be key components of the Proposed Action. Licensed inspectors would conduct predemolition/renovation asbestos surveys of each structure to be demolished or renovated as part of the Proposed Action. ACM would be removed by licensed abatement contractors prior to

building renovation/demolition to prevent exposure of these materials to surrounding property occupants. The demolition of buildings containing LBP could result in the generation of LBP-generating dust. Standard demolition BMPs to control dust would reduce dust emissions to less-than-significant levels.

No significant adverse long-term impacts during future operations of the VASNHCS campus are anticipated. The Proposed Action would not result in a substantial increase in the generation of solid or hazardous wastes, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation. Storage, handling, or use of petroleum or hazardous substances would be similar to current operations and managed in a similar manner in compliance with Federal, state, and local laws and regulations.

3.13.2 Cumulative Impacts

Cumulative solid and hazardous materials impacts associated with the Proposed Action, in conjunction with the other planned VASNHCS projects, would be less-than-significant.

Many of the planned projects would include the renovation or demolition of structures that may contain ACM and LBP. Identification and abatement of the ACM and damage/peeling LBP that would be disturbed by these projects would be key components of each project. In addition, each demolition project would include dust control measures to reduce potential LBP dust emissions. These measures, all standard BMPs, would prevent unacceptable ACM and LBP exposures to site workers and the surrounding property occupants.

In addition, none of the planned projects would result in a substantial increase in the generation of solid or hazardous wastes, increase the presence of hazardous or toxic materials in the environment, or increase the exposure of persons to hazardous or toxic substances during future VASNHCS campus operations.

3.13.3 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA would occur, none of the building materials would be disturbed, and the aged diesel UST currently used for the backup power generator for the northern portion of the campus would not be replaced. No ACM within the campus buildings would be removed and there would be a greater risk of a diesel release from the UST than with the replacement UST included as part of the Proposed Action.

3.13.4 Mitigation/Management Measures

No significant adverse solid and hazardous materials impacts are anticipated and no project-specific mitigation measures are required.

To reduce potentially adverse solid and hazardous materials effects, VA would implement the following management and BMPs. Implementation of these measures, including complying with all regulatory requirements, would maintain potential adverse effects at less-than-significant levels.

- Complete ACM surveys of all buildings planned for renovation or demolition by Nevada-certified inspectors.

- Remove identified ACM and damaged/peeling LBP from buildings to be renovated or demolished by Nevada-licensed abatement contractors as required under NESHAP, State and local regulations.

- Use dust suppressants during building demolition to control potential LBP-containing dust emissions.

- Empty and remove the diesel UST associated with the northern campus backup power generator by a licensed contractor.

- Remediate to required applicable standards any identified soil contamination.

In addition, VA would implement standard construction BMPs to ensure that construction equipment and activities do not result in releases to the environment. During operation, VA would manage operation-related solid and hazardous materials in accordance with VA's solid and hazardous materials SOPs and applicable Federal and State laws.

3.14 Transportation and Parking

Patient and visitor access to the VASNHCS campus medical facilities is primarily provided from the western side of Kirman Avenue. Ambulance access is located in the southwestern corner of the campus with entrances from both Locust Street and Burns Street.

In 2016, VA retained GHD to conduct a traffic impact analysis to evaluate the existing traffic conditions in the vicinity of the VASNHCS campus and the potential traffic impacts associated with this Proposed Action, the proposed Building 1 Seismic Upgrade and Clinical Expansion Project, the proposed Land Acquisition Project, and the planned reduction of Kirman Avenue between the eastern and western portions of the VASNHCS campus to one lane (Projects). Roadways adjacent to the VASNHCS are summarized below in Table 8 and depicted on Figures 3-5 and Figure 11.

Table 8. Roadways Adjacent to VASNHCS

Type	Route	Direction	2016 Daily Traffic Volumes (VPD)	Road Width (feet)	Lanes	Capacity (VPD)	V/C Ratio
Arterial	Locust Street: Burns Street - Crampton Street	One-way North	2,533	35	2*	12,000	0.21
Arterial	Locust Street: East Taylor Street to Cheney Street	One-way North	2,209	35	2*	12,000	0.18
Collector	East Taylor Street: Wilson Avenue - Locust Street	East/West	2,280	35	2*	12,000	0.19
Collector	East Taylor Street: Locust Street - Kirman Avenue	East/West	2,773	35	2*	12,000	0.23
Collector	East Taylor Street: Kirman Avenue - Edelweiss Street	East/West	3,122	35	2*	12,000	0.26
Collector	Kirman Avenue: Cheney Street – East Taylor Street	One-way South	3,305	35	2*	12,000	0.28
Collector	Kirman Avenue: East Taylor Street - Belli Drive	One-way South	4,334	35	2*	12,000	0.36
Collector	Kirman Avenue: Belli Drive - Burns Street	One-way South	3,994	35	2*	12,000	0.33
Local	Belli Drive: West Driveway - Kirman Avenue	East/West	782	35	2*	2,000	0.39
Local	Belli Drive: East Driveway - Wlikinson Avenue	East/West	1,471	35	2*	2,000	0.74
Local	Wilkinson Avenue: East Taylor Street - Belli Drive	North/South	1,475	30	2*	2,000	0.74
Local	Burns Street: Locust Street - Kirman Avenue	East/West	1,433	30	2*	2,000	0.72

*-Denotes street-side parking in addition to traffic lanes.
Traffic counts conducted in February 2016.
VPD = vehicles per day
V/C Ratio = Volume to capacity ratio. A V/C Ratio under 0.85 indicates that the roadway is operating under capacity. Excessive delays are not anticipated. A V/C Ratio between 0.85 and 0.95 indicates that the roadway is operating near capacity. A V/C ratio greater than 1.00 indicates that demands exceed available capacity of the roadway. Excessive delays are anticipated.

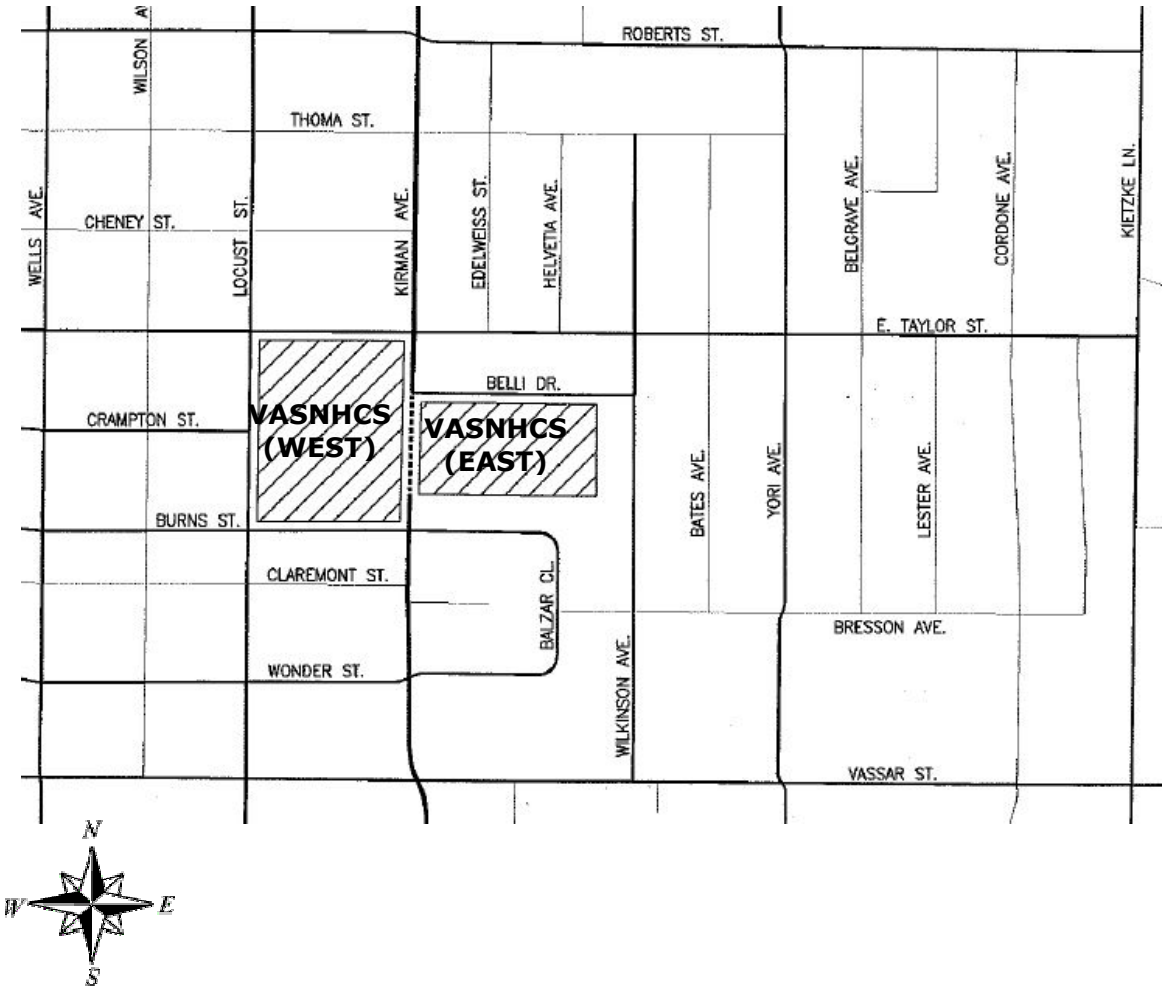


FIGURE 11
AREA ROADWAYS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS CAMPUS
RENOVATION AND MODERNIZATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS

TTL PROJECT NO.
12181.03

TTL associates inc
Environmental, Geotechnical Engineering & Testing

The GHD VASNHCS Renovation and Modernization Traffic Study Report, dated June 2016 (GHD report), evaluated 23 intersections and 19 roadway segments adjacent to and in the vicinity of the VASNHCS campus for existing traffic conditions (2016) and the predicted future traffic conditions in 2025 (with and without the Projects) and 2035 (with and without the Projects). GHD evaluated worst-case peak traffic conditions, during the a.m. and p.m. weekday rush hours. The following intersections were evaluated:

- Wells Avenue/Roberts Street
- Wells Avenue/East Taylor Street
- Wells Avenue/Crampton Street
- Wells Avenue/Burns Street
- Wells Avenue/Vassar Street
- Locust Street/East Taylor Street
- Locust Street/Crampton Street
- Locust Street/Burns Street
- Kirman Avenue/East Taylor Street
- Kirman Avenue/Belli Drive
- Kirman Avenue/North Driveway
- Kirman Avenue/Middle Driveway
- Kirman Avenue/South Driveway
- Kirman Avenue/Burns Street – Balzar Circle
- Kirman Avenue/Wonder Street – Balzar Circle
- Kirman Avenue/Vassar Street
- Belli Drive/West Driveway
- Belli Drive/East Driveway
- Wilkinson Avenue/East Taylor Street
- Wilkinson Avenue/Belli Drive
- Wilkinson Avenue/Vassar Street
- Kietzke Lane/Roberts Street
- Kietzke Lane/East Taylor Street

The following roadway segments were evaluated:

- Wells Avenue north of Roberts Street
- Wells Avenue north of East Taylor Street
- Wells Avenue South of Crampton Street
- Locust Street north of East Taylor Street
- Locust Street south of Crampton Street
- Locust Street north of Wonder Street
- Kirman Avenue north of East Taylor Street
- Kirman Avenue south of East Taylor Street
- Kirman Avenue north of Burns Street
- Kirman Avenue north of Vassar Street
- Wilkinson Avenue south of East Taylor Street
- East Taylor Street west of Locust Street
- East Taylor Street west of Kirman Avenue
- East Taylor Street east of Kirman Avenue
- East Taylor Street east of Wilkinson Avenue

- Belli Drive east of Kirman Avenue
- Belli Drive west of Wilkinson Avenue
- Burns Street west of Locust Street
- Burns Street west of Kirman Avenue

GHD used the Transportation Research Board Highway Capacity Manual procedures to evaluate the existing and future Level of Service (LOS) of intersections near the VASNHCS campus. LOS is a qualitative measure of traffic flow and is represented by letter designations ranging from "A" to "F" with an LOS of A representing the best conditions and an LOS of F representing the worst conditions. The City of Reno has established LOS D as the minimally acceptable LOS for its roads. GHD used volume/capacity ratios to evaluate roadway segments.

Existing Conditions

The GHD report indicated that the roadway segments near the VASNHCS campus are currently operating below capacity with the exception of Wells Avenue between East Taylor and Cheney Streets, and Wells Avenue between Moran and Roberts Streets. GHD stated that excessive travel delays may be experienced by drivers along these segments of Wells Avenue, particularly during peak traffic hours (7 to 9 am and 4 to 6 pm). GHD also stated that the Wells Avenue roadway segment between Crampton and Burns Street is operating near its capacity and excessive travel delays may be experienced by drivers along this segment, particularly during peak traffic hours.

The GHD report indicated that the evaluated intersections are currently operating at acceptable LOS (LOS D or better) with the exception of following intersections:

- Wells Avenue / East Taylor Street:
  - The eastbound approach during the pm peak hours (LOS E).

- Wells Avenue / Crampton Street:
  - The eastbound approach during the pm peak hours (LOS E).

- Kietzke Lane / East Taylor Street:
  - The eastbound left approach during the am and pm peak hours (LOS F).
  - The westbound left approach during the pm peak hours (LOS F).

GHD noted that with the exception of the intersection of Wells Avenue and Vassar Street, there are no signalized intersections within the area studied. GHD stated that the intersection of Kietzke Lane and East Taylor Street meets the criteria for the addition of a traffic signal, which would improve the LOS of the intersection.

2025 and 2035 Without Projects

GHD evaluated the same 23 intersections near the VASNHCS campus for the years 2025 and 2035 without the proposed projects using traffic growth projections obtained from the RTC Regional Travel Forecasting Model. The GHD report stated that the 2025 traffic conditions, without the Projects, are modelled to have the same unacceptable LOS intersections and movements as identified in the existing (2016) conditions.

The GHD report indicated that without the implementation of the Projects, the evaluated intersections would operate at acceptable LOS in 2035 with the exception of following intersections:

- Wells Avenue / Roberts Street:
  - The eastbound approach during the pm peak hours (LOS F).
  - The westbound approach during the pm peak hours (LOS F).

- Wells Avenue / East Taylor Street:
  - The eastbound approach during the am (LOS E) and pm (LOS F) peak hours.
  - The westbound approach during the am (LOS E) and pm (LOS F) peak hours.

- Wells Avenue / Crampton Street:
  - The eastbound approach during the pm peak hours (LOS F).
  - The westbound approach during the pm peak hours (LOS E).

- Wells Avenue / Burns Street:
  - The eastbound approach during the pm peak hours (LOS F).

- Kietzke Lane / East Taylor Street:
  - The eastbound approach during the am and pm peak hours (LOS F).
  - The westbound approach during the pm peak hours (LOS F).

Public transportation in the City of Reno is provided by the RTC. RTC Bus Route 13 runs north along Locust Street and south along Kirman Avenue between the eastern and western portion of the campus and includes stops at the VASNHCS campus.

The USEPA recommended that a plan be developed to address the potential impacts from the Proposed Action related to the routing of construction vehicles and increased traffic.

Parking

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 indicated 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.

In a letter dated October 19, 2015, the City of Reno noted that the VASNHCS has reported issues with the pedestrian crossing at Kirman Avenue between the eastern and western portions of the campus and stated that any additions to the east side of the campus (the proposed parking structure) should address this issue.

3.14.1 Effects of the Proposed Action Alternative

The Proposed Action would have less-than-significant short-term and long-term direct and indirect adverse transportation impacts. During the implementation of the Proposed Action, construction traffic (trucks, workers' personal vehicles, and construction equipment) would increase traffic volumes in the local area, and could cause delays if this occurred during morning and evening peak periods. Less-than-significant short-term adverse impacts would be anticipated. These impacts would be reduced through the implementation of BMPs described in Section 3.14.4.

Following the completion of the Proposed Action projects, public roadways in the vicinity of the VASNHCS campus would experience minor additional traffic as a result of the Proposed Action. GHD estimated the Proposed Action would only result in approximately 160 daily vehicle trips per day (approximately 80 additional vehicles per day). These additional trips could occur throughout the day and night. However, the majority of the trips would occur during weekdays from approximately 6 am to 6 pm. As shown on Table 8, the traffic generated as a result of the Proposed Action (160 daily trips) generally would be an approximately ten percent increase or less over existing traffic volumes on roads adjacent to the VASNHCS campus and the increased volumes would be well within the capacities of these roads. In addition, none of the intersections that are currently operating at an unacceptable LOS are adjacent to the VASNHCS. The increased traffic from the Proposed Action would add traffic to more distant intersections that currently operate at an unacceptable LOS; however, the additional traffic added to these intersections would be minimal. In addition, increased traffic generated by the Proposed Action would not cause intersections that currently operate at acceptable levels to operate unacceptably. As such, the long-term traffic impacts associated with the Proposed Action would be less-than-significant.

The Proposed Action would have short-term less-than-significant adverse parking impacts and long-term significant beneficial parking impacts. During construction activities, the existing surface parking in the southeastern portion of the campus would be temporarily eliminated (approximately 35 spaces). In addition, new CLC Pod 2 would be constructed in the northwest corner of the campus and would permanently eliminate the surface parking lot that currently exists in this area (approximately 25 spaces). However, as part of the Proposed Action, VA would construct a new approximately 320-space parking garage in the southeastern portion, resulting in a net gain of approximately 260 parking spaces as a result of the Proposed Action. The additional on-campus parking provided by the Proposed Action would have a significant positive impact at the campus, which is currently operating a deficit of approximately 580 parking spaces. The additional on-campus parking provided by the Proposed Action would begin to eliminate the need for street parking in the residential neighborhoods surrounding the campus, which would reduce traffic congestion and pedestrian hazards in the area surrounding the VASNHCS campus.

The City of Reno reviewed the GHD report and stated that no additional actions to address traffic conditions associated with the Proposed Action would be required by VA at this time. Traffic conditions around the VASNHCS will continue to be monitored by the City of Reno and the City of Reno would implement roadway improvements, as necessary, to manage potential future traffic impacts, if any.

3.14.2 Cumulative Impacts

Transportation

Each of the proposed VASNHCS projects would affect traffic conditions in the area of the VASNHCS campus. The Proposed Action projects would have only very minor traffic impacts; however, other planned projects, in particular the Building 1 Seismic Upgrade and Clinical Expansion Project and the proposed Kirman Avenue modifications, would have greater impact on transportation in the area as a result of increased patient visits and shifted traffic patterns. The GHD report evaluated the cumulative impacts of all of the proposed VASNHCS campus projects. GHD estimated that these projects would collectively result in approximately 3,626 daily vehicle trips (approximately 1,813 additional vehicles per day), primarily (96%) associated with the Building 1 Seismic Upgrade and Clinical Expansion Project.

The GHD report concluded that VASNHCS projects would add more traffic to each of the intersections that already function at an unacceptable LOS or are projected to function at an unacceptable LOS in 2025 and 2035 without the proposed VASNHCS projects. The additional traffic from the VASNHCS projects would exacerbate the traffic conditions at these intersections. In addition, GHD indicated that the planned VASNHCS projects would cause the following intersections, that would otherwise operate acceptably, to operate unacceptably:

2025

- Wells Avenue / East Taylor Street:
  - The westbound approach during the pm peak hours (from LOS D to LOS F).

2035

- Wells Avenue / Roberts Street:
  - The eastbound approach during the am peak hours (from LOS D to LOS E).

GHD also noted that the intersection of Kietzke Lane and East Taylor Street currently meets the criteria for the addition of a traffic signal, which would improve the LOS of the intersection under each of the evaluated scenarios.

VA provided the GHD report to the City of Reno and met with City of Reno representatives to discuss the findings of the traffic impact analysis and potential mitigation measures. City of Reno representatives reviewed the potential cumulative traffic impacts of the planned VASNHCS projects and concluded that no roadway improvements or other traffic mitigation measures are required at this time. The City of Reno will continue to monitor traffic conditions in the VASNHCS campus area and will implement roadway improvements, as necessary. Through close coordination with the City of Reno, VA would implement improvements, as necessary, to address potential cumulative unacceptable traffic impacts.

Parking

As part of the Proposed Action, VA would construct a new approximately 320-space parking garage in the southeastern portion of the VASNHCS campus, resulting in a net gain of approximately 260 parking spaces for the Proposed Action. The Site Acquisition Project would create up to 200 additional VA-owned parking spaces on the acquired land adjacent to the

current campus boundaries. These projects would have a significant positive cumulative effect through the creation of up to 460 parking spaces, overcoming most of the current parking shortage (580 parking spaces). Together, these actions would nearly eliminate the VA's need for street parking in the residential neighborhoods surrounding the VASNHCS campus, which would reduce traffic congestion and pedestrian hazards.

3.14.3 Effects of the No Action Alternative

Under the No Action Alternative, no transportation or parking impacts associated with VA's Proposed Action would occur. The VASNHCS would continue to operate at an on-campus parking deficiency, resulting in the overutilization of street parking in the surrounding residential neighborhood.

The No Action Alternative would not enable VA to provide safely accessible, adequate parking for VASNHCS patients, staff and visitors and would result in a significant adverse, long-term direct impact to US Veterans.

3.14.4 Mitigation/Management Measures

No significant adverse transportation and parking impacts are anticipated and no project-specific mitigation measures are required for the Proposed Action.

Implementing BMPs would minimize the potential impacts on local roadways. As part of the Proposed Action, transportation impacts would be maintained at acceptable levels through implementation of the following BMPs:

- VA would 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 Proposed Action 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.

3.15 Utilities

Basic utilities in the City of Reno (i.e., water, sewer, natural gas, and electric) are provided by the various utility providers. As part of the preparation of this EA, local utility providers were researched to determine the availability of required utilities in the vicinity of the VASNHCS campus. The following identifies the utility providers to the VASNHCS campus:

Truckee Meadows Water Authority (TMWA) supplies potable water to the vicinity of the VASNHCS campus. VA would be required to submit design plans to the TMWA for potable water service.

Reno Public Works Department (RPWD) is responsible for stormwater management at the VASNHCS campus through the NPDES permitting process. VA would be required to submit a SWMP to the RPWD, as detailed in Section 3.6.6.

RPWD supplies sanitary sewer service to the vicinity of the VASNHCS campus. VA would be required to submit design plans to the RPWD for sanitary sewer service.

NV Energy supplies electrical service to the vicinity of VASNHCS campus. VA would be required to submit design plans to NV Energy for electrical service.

NV Energy supplies the natural gas to the vicinity of the VASNHCS campus. VA would be required to submit design plans to NV Energy for natural gas service.

AT&T provides telecommunication services to the vicinity of the VASNHCS campus. VA would be required to submit design plans to AT&T for telecommunication services.

3.15.1 Effects of the Proposed Action Alternative

The Proposed Action would result in a minimal increase in the consumption of utilities, including electricity, natural gas, potable water, and sanitary sewer discharges. All major utility services are currently provided to to the VASNHCS campus. Proposed Action activities are not anticipated to require alteration of the existing utility mains or affect off-site utility consumers. No significant impacts to utilities are anticipated.

3.15.2 Cumulative Impacts

The other planned VASNHCS projects would also result in an increase in the consumption of utilities, including electricity, natural gas, potable water, and sanitary sewer discharges. However, the cumulative increase in the consumption of utilities associated with the Proposed Action and these other projects would be moderate and unlikely to exceed the capacity of the various utility providers. Cumulative utility impacts would be less-than-significant.

3.15.3 Effects of the No Action Alternative

Under the No Action Alternative, no demolition, construction, or renovation by VA would occur. Local utility use would remain unchanged.

3.15.4 Mitigation/Management Measures

No significant utilities impacts are anticipated and no project-specific mitigation measures are required.

Utility impacts would be maintained at acceptable levels through the implementation of the following BMPs. VA would:

- Obtain permits from the utility providers for capping/disconnecting the existing utility services prior to building demolition.

- Submit design plans to each utility provider to determine the specific connection requirements and would implement the necessary requirements.

- Comply with the NPDES requirements for stormwater management, as necessary.

3.16 Environmental Justice

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued to focus attention of Federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed. In order to provide a thorough environmental justice evaluation, this socioeconomics' presentation gives particular attention to the distribution of race and poverty status in areas potentially affected by implementation of the Proposed Action. For purposes of this analysis, minority and low-income populations are defined as:

- Minority Populations: Persons of Hispanic origin of any race, African Americans, American Indians, Eskimos, Aleuts, Asians, or Pacific Islanders.

- Low-Income Populations: Persons living below the poverty level, based on a total annual income of $24,250 for a family of four persons as reported in January 2015.

The VASNHCS campus is located in a residential area with a disproportionately large low-income population relative to the remainder of the City of Reno, Washoe County, and the State of Nevada. According to the USEPA-developed EJSCREEN (an environmental justice mapping and screening internet application), the area within a 0.25-mile radius of the campus includes a higher concentration of low-income populations (66 percent) than the State of Nevada (34 percent). The area within a 0.5-mile radius of the campus also includes a higher concentration of low-income populations (62 percent) than the State of Nevada. EJSCREEN did not identify a disproportionately large minority population in the area.

3.16.1 Effects of the Proposed Action

Although the VASNHCS campus is located in a residential area with a disproportionately high low-income population, the Proposed Action is anticipated to have less-than-significant environmental justice effects. During demolition and construction activities, effects on adjacent residential properties, such as through noise and dust, would be limited and controlled as discussed in Sections 3.3.6 and 3.8.4, thereby minimizing adverse effects to low-income populations in the ROI. In addition, the Proposed Action construction activities are anticipated to result in short-term direct, positive socioeconomic impacts to local employment and personal income in the ROI, as described in Section 3.11.6. Given the ROI is a low-income community, such positive effects would be anticipated to extend to low-income citizens, a positive environmental justice effect. The Proposed Action would also reduce street parking in the local residential neighborhoods by VASNHCS staff and patients, which would reduce pedestrian hazards for these low-income neighborhoods, a beneficial environmental justice effect.

No local groups are known to principally rely on fish or wildlife for subsistence in the vicinity of the VASNHCS campus. Consequently, none to negligible adverse impacts to such disadvantaged segments of the population are anticipated.

3.16.2 Cumulative Impacts

The Proposed Action and the other planned projects at the VASNHCS campus could have environmental justice effects on the neighboring residential properties through noise, dust, and vehicle emissions. However, each of these projects would implement control measures and general BMP to minimize adverse effects to low-income populations during demolition and construction, such as those outlined in Sections 3.3 and 3.8. The projects would contribute to cumulative positive socioeconomic and environmental justice effects to the ROI through increased short-term and long-term jobs and incidental spending.

As part of the Land Acquisition and Kirman Avenue Modification Project, VA would acquire up to 11 residential parcels surrounding the campus for the construction of surface-level parking lots for the campus. However, VA, as part of its "good neighbor" policy and being sensitive to environmental justice considerations, would only acquire these parcels from willing landowners through amicable negotiation and would provide relocation assistance for displaced residents and residential tenants. In addition, VA has had substantial and documented public engagement to ensure effective and meaningful community participation for each of the planned VASNHCS projects and the NEPA process. As such, the associated environmental justice impacts would be less-than-significant.

3.16.3 Effects of the No Action Alternative

Under the No Action Alternative, the proposed VA activities would not occur and there would be no environmental justice effects.

3.16.4 Mitigation/Management Measures

No project-specific mitigation or management measures are required.

3.17 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 during the duration of the Proposed Action in the same geographic area. Because of extensive influences of multiple forces, cumulative effects are the most difficult to analyze.

NEPA requires the analysis of cumulative environmental effects of a Proposed Action, or set of actions, on resources that may often be manifested only at the cumulative level, such as traffic congestion, air quality, noise, biological resources, cultural resources, socioeconomic conditions, utility system capacities, and others.

The ROI for the Proposed Action is a fully developed urban area. The area located around VASNHCS campus is currently occupied by residential neighborhoods with little space remaining for in-fill development. Starting in 2010, VA began a multi-year effort to reconfigure the VASNHCS campus to provide additional and more efficient medical care for Reno area Veterans.

In addition to the proposed VASNHCS campus renovation and modernization projects included within this Proposed Action, VA is planning other VASNHCS expansion, renovation and modernization projects. Other planned projects include:

- **Land Acquisition and Kirman Avenue Modification Project –** Acquisition of up to 11 residential properties adjoining to the north and east of the current VASNHCS campus, across East Taylor Street and Kirman Avenue, for surface level parking (up to 200 parking spaces). Anticipated to be completed for the initial 3 parcels by April 2018. The remaining parcels will be acquired as they become available, anticipated in late 2020.

  Reduction of Kirman Avenue to one lane between western and eastern portions of the VASNHCS campus to connect the two portions of the campus and provide safe patient and staff access from parking facilities east of Kirman Avenue with medical center buildings west of Kirman Avenue. Anticipated to begin in December 2021.

- **Building 1 Seismic Upgrade and Clinical Expansion Project –** Clinical Expansion Building and Upgrading and Renovation of Building 1. Anticipated to begin in spring 2018.

Based on proximity and general timing, the Proposed Action could have short-term, construction-related cumulative impacts in conjunction with these other planned VASNHCS reconfiguration construction projects, although it is anticipated that most of these projects would not be constructed at the same time. No non-VA projects are known to be planned for the VASNHCS campus area.

The Proposed Action would result in the impacts identified throughout Section 3. These include less-than-significant potential adverse impacts to aesthetics, air quality, cultural resources, soils and geology, hydrology and water quality, noise, land use, socioeconomics, solid and hazardous materials, transportation and parking, utilities, and environmental justice. All of these impacts are less-than-significant and would be further reduced through careful coordination and implementation of the general BMPs and management measures, and compliance with regulatory requirements as identified throughout Section 3. No adverse effects to wildlife and habitat; wetlands, floodplains, and coastal zones; or community services are anticipated as a result of the Proposed Action.

Cumulative effects of the Proposed Action in conjunction with the other planned VASNHCS campus projects were also assessed by resource area in Section 3. No cumulative adverse effects to natural resources, such as wetlands, biological resources, or protected species would occur. The ROI includes a fully developed urban area with limited natural resources.

While VASNHCS campus is located in a low-income area, no significant adverse cumulative effects to local socioeconomics or environmental justice would occur. Over the long-term, the Proposed Action would contribute to cumulative positive socioeconomic and environmental justice effects to the ROI through increased jobs and incidental spending.

The Proposed Action would not contribute to adverse cumulative aesthetics, air quality, noise, geology and soils, hydrology and water quality, land use, community services, or utilities effects within the ROI. Through implementation of the identified management and regulatory compliance measures, these contributory effects would be minimal and properly managed,

working in close cooperation with pertinent regulatory agencies. Consequently, the Proposed Action would not contribute to a cumulative significant adverse effect.

The VASNHCS campus and surrounding area includes four NRHP-eligible historic districts that could be adversely affected by the Proposed Action and other planned projects at the VASNHCS campus. However, VA has determined and SHPO has concurred that the primary Proposed Action construction projects would have no adverse effect on historic properties and the remaining Proposed Action projects are not anticipated to have an adverse effect on historic properties. As such, the Proposed Action would not contribute to cumulative cultural resource impacts. VA has had on-going consultation with SHPO regarding the Proposed Action, the Land Acquisition and Kirman Avenue Modification Project, and the Building 1 Seismic Upgrade and Clinical Expansion Project, and other more distant potential future projects. Through this process, VA has addressed individual projects as well as the comprehensive planned transformation of the VASNHCS campus; thereby addressing potential cumulative impacts. The Land Acquisition and Kirman Avenue Modification Project and the Building 1 Seismic Upgrade and Clinical Expansion Project could have adverse effects on the NRHP-eligible historic districts in the campus area. In consultation with SHPO, VA had developed plans to mitigate these cultural resources effects through formal MOAs. Future projects at the VASNHCS campus will be addressed through a PA and/or other Section 106 regulatory mechanisms. Compliance with these agreements would ensure that significant cultural resources impacts, if any, would be mitigated.

The Proposed Action would add only approximately 160 daily vehicle trips (80 vehicles per day) and would not result in significant traffic impacts. The other planned VASNHCS campus projects, in particular the Building 1 Seismic Upgrade and Clinical Expansion Project and the proposed Kirman Avenue modification, would have greater impact on traffic in the area as a result of increased patient visits and shifted traffic patterns. GHD conducted a traffic impact analysis to evaluate the cumulative effect of all of the planned VASNHCS projects. This analysis found that three intersections in the VASNHCS area currently operate at an unacceptable level of service (below LOS D) and that two additional intersections in the area will operate below LOS D by 2035, without the implementation of the planned VASNHCS projects. The additional traffic from the proposed project would exacerbate the traffic conditions at these intersections and would cause two additional intersections that would otherwise operate acceptably to operate unacceptably. VA met with City of Reno representatives to discuss the findings of the traffic impact analysis. The City of Reno representatives concluded that no roadway improvements or other traffic mitigation measures are required at this time. The City of Reno will continue to monitor the conditions in the VASNHCS campus area and will implement roadway improvements in the future, as necessary. Through close coordination with the City of Reno, VA would implement improvements, as necessary, to address potential cumulative unacceptable traffic impacts.

As part of the Proposed Action, VA would construct a parking structure on the southeastern portion of the VASNHCS campus would provide approximately 320 parking spaces, resulting in a net increase of approximately 260 parking space for the Proposed Action. The Site Acquisition Project would create up to 200 additional VA-owned parking spaces on the acquired land. These projects would have a significant positive cumulative effect through the creation of up to 460 parking spaces, overcoming most of the current parking shortage (580 parking spaces). Together, these actions would nearly eliminate the VASNHCS need for street parking in the residential neighborhoods surrounding the campus, which would reduce traffic congestion and pedestrian hazards.

Overall, no significant adverse cumulative impacts to the environment, induced by changes by the Proposed Action, are anticipated within the ROI. Close and ongoing coordination between VA and the City of Reno and SHPO, and other community agencies and representatives would serve to manage and control cumulative effects within the ROI, including managing regional transportation increases with adequate infrastructure.

Implementation of local and State land use, resource management, and other plans, coupled with ongoing compliance with Federal, State, and local regulations and requirements, as applicable, would serve to control the extent of environmental impacts, and proper planning would ensure future socioeconomic conditions maintain, if not improve, the local standard of living. Implementation of these plans and regulations should minimize or eliminate any potential cumulative degradation of the natural, cultural, or human environment within the ROI.

3.18 Potential for Generating Substantial Public Controversy

As discussed in Section 4.0, VA has solicited input from various Federal, State, and local government agencies regarding the Proposed Action. Several of these agencies have provided input; none of the input has identified opposition or controversy related to the Proposed Action. VA, as the proponent of the Proposed Action, published and distributed the Draft EA for a 30-day public comment period from August 5, 2016 through September 6, 2016. VA received comments from the USEPA (discussed in Section 4). USEPA did not express opposition to the Proposed Action. VA received no other public comments. Based on the significant positive effects of the Proposed Action and the findings of this EA (no significant adverse environmental impact), it is not anticipated that there will be substantial public controversy regarding the Proposed Action.

SECTION 4: PUBLIC INVOLVEMENT

4.1 Public and Agency 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 policy for implementing the 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. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as minority, low-income, and disadvantaged persons, are urged to participate. A record of agency coordination and public involvement associated with this EA is provided in Appendix A and Appendix D.

4.1.1 Public Review

VA, as the proponent of the Proposed Action, 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* from August 5, 2016 through August 7, 2016. The Draft EA was also made available for public review at the VASNHCS and the Washoe County Library and was posted on the VASNHCS website.

VA received a comment letter from the USEPA, dated September 6, 2016. The USEPA indicated that the Draft EA addressed their concern of the separate NEPA evaluation of the Proposed Action from the Site Acquisition and Kirman Avenue Modification Project and the Building 1 Seismic Upgrading, Renovation and Expansion Project through an analysis of the cumulative effects of each of these projects. However, the USEPA stated that the Draft EA did not appear to have fully addressed the potential for cumulative air quality impacts and did not discuss the magnitude of other campus renovation projects, primarily the Building 1 Seismic Upgrade and Clinical Expansion Project, and the potential cumulative air quality impacts of the campus renovation projects if they were all implemented concurrently. USEPA recommended that a schedule of the campus renovation projects be discussed in the Final EA and that the Final EA include a quantification and evaluation of air quality emissions, if the campus renovation projects are planned to be implemented concurrently. USEPA stated that if quantification of air quality emissions is not conducted, VA should provide additional support for concluding that cumulative air quality impacts are less than significant. USEPA also stated that should VA establish a construction schedule for the various planned projects to reduce the cumulative air quality impacts to less than significant, the schedule should be included in the Final EA.

USEPA also commended VA for its environmental justice approach for the Land Acquisition Project (only acquiring parcels from willing sellers and providing relocation assistance) and encouraged VA to describe in the Final EA and FONSI the proposed strategy for community outreach, including a description of how VA will determine willing sellers among affected

landowners. Details regarding VA's property acquisition, relocation, and community outreach efforts and procedures are included in the Final EA and FONSI for the Land Acquisition and Kirman Avenue Modification Project (February 2016).

The USEPA's comments are included in Appendix D. Where applicable, the Final EA was modified to reflect these comments.

No other public comments were received regarding the Draft EA.

4.1.2 Agency Coordination

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a Federally-mandated process for informing and coordinating with other governmental agencies regarding Federal Proposed Actions. CEQ Regulations require intergovernmental notifications prior to making any detailed statement of environmental impacts. Through the IICEP process, VA notifies relevant Federal, State, and local agencies and allows them sufficient time to make known their environmental concerns specific to a Proposed Action. Comments and concerns submitted by these agencies during the IICEP process are subsequently incorporated into the analysis of potential environmental impacts conducted as part of the EA. This coordination fulfills requirements under EO 12372 (superseded by EO 12416, and subsequently supplemented by EO 13132), which requires Federal agencies to cooperate with and consider State and local views in implementing a Federal proposal. It also constitutes the IICEP process for this EA.

Agencies consulted for this EA include: US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Army Corps of Engineers (USACE); Nevada Division of Environmental Protection (NDEP); Nevada Department of Conservation and Natural Resources (NCDNR); Nevada State Historic Preservation Office (SHPO); Nevada Department of Transportation (NDOT), United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Washoe County Air Quality Management Division (WCAQMD); Reno Economic Community Development Department (RECDD), Reno Economic Development and Redevelopment Department (REDRD), Reno Department of Public Works (RDPW), and Regional Transportation Commission of Washoe County (RTC).

Responses were received from the following agencies: USEPA, USFWS, NDEP, SHPO, RTC, and City of Reno. Input provided by these agencies is detailed and addressed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix A.

4.1.3 Native American Consultation

VA consulted with several Federally-recognized Native American tribes as part of this NEPA process, in accordance with 36 CFR 800.2 and EO13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000. These tribes, identified as having possible ancestral ties to the area as identified by the SHPO and/or the Native American Consultation Database (NACD), were invited by VA to participate in the EA process as Sovereign Nations per EO 13175. In addition, SHPO identified two Nevada organizations, Preserve Nevada and Nevada Architectural History Alliance, and requested that VA includes these organizations in their consultation. These tribes and organizations were sent coordination and consultation

letters via certified mail. A list of the tribes that were consulted is provided in Section 10. As of the date of this EA, no responses have been received from the tribes (VA 2016).

SECTION 5: MANAGEMENT AND MITIGATION MEASURES

This section summarizes the management and mitigation measures, if any, identified in Section 3 that are proposed to minimize and maintain adverse effects at acceptable, less-than-significant levels.

Per established protocols, procedures, and requirements, the VA and its construction contractor would implement BMPs and would satisfy all applicable regulatory requirements in association with the design, construction, and operation of the Proposed Action projects. These "management measures" are described in this EA, and are included as components of 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 the State of Nevada. In general, implementation of such management measures, as identified throughout Section 3, 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 construction projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

5.1 Management Measures

With implementation of routine "management measures," the Proposed Action would not result in significant adverse impacts to, and would reduce any identified potential adverse effects to, the current environmental setting associated with the following technical resource areas:

Aesthetics. Conform with the RLDC, to the extent practicable, maintain landscaping along site boundaries, design the parking structure to maintain setbacks from the adjacent residential properties to the extent possible, design and implement projects to be visually consistent with the existing VASNHCS campus as detailed in Section 3.2.

Air Quality. Complete pre-demolition asbestos surveys for each building proposed for renovation/demolition, remove ACM prior to building renovation/demolition, use dust suppressants during demolition, develop and implement a 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 AQMD, and comply with the Washoe County AQMD regulations, as described in Section 3.3.

Cultural Resources. Finalize the PA and/or other Section 106 regulatory mechanisms in conjunction with the Nevada SHPO and comply with their requirements, as described in Section 3.4.

Geology and Soils. Control soil erosion and sedimentation impacts during construction by complying with NPDES requirements. Refer to Section 3.5.

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. Refer to Section 3.6.

Wildlife and Habitat. Replant and landscape with native species, incorporate pollinator friendly practicing in landscaping, and comply with the City of Reno RLDC to the extent practicable, as described in Section 3.7.

Noise. Comply with the City of Reno Noise Ordinance. Minimize noise effects during construction activities, as described in Section 3.8.

Solid and Hazardous Materials. Complete predemolition asbestos surveys, remove ACM and damaged/peeling LBP prior to demolition, empty and remove the diesel UST associated with the north campus backup power generator and remediate any identified associated soil contamination. Refer to Section 3.13.

Transportation and Parking. Work with the City of Reno to identify and implement roadway improvements (as necessary), ensure debris/soil is not deposited on local roads during construction, time construction traffic to avoid peak travel hours. Refer to Section 3.14.

Utilities. Submit Proposed Action design plans to obtain necessary approvals from utility providers, as described in Section 3.15.

No management measures are identified by this EA's analysis for the Proposed Action Alternative for the following technical resource areas: ***Land use; Wetlands, Floodplains, and Coastal Zone Management; Socioeconomics; Community Services; and Environmental Justice***.

5.2 Mitigation Measures

No project-specific mitigation measures are proposed for the Proposed Action.

SECTION 6: CONCLUSIONS

This EA evaluates the Proposed Action of VA to renovate and modernize the VASNHCS campus located at 975 Kirman Avenue in Reno, Washoe County, Nevada. The Proposed Action is needed because existing facilities are antiquated and inadequately sized to provide the modern delivery of healthcare services needed by Reno area Veterans. These deficiencies are projected to grow in the future as the patient workload for the VASNHCS increases. In addition, the VASNHCS campus does not meet all modern VA design standards and Federal setback and security requirements. This EA discusses two alternatives: (1) the Proposed Action Alternative – the implementation of various construction and renovation projects to renovate and modernize the existing VASNHCS campus facilities; and (2) the No Action Alternative. The EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; and environmental justice. The EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementing the Proposed Action Alternative, provided general best management practices (BMPs) and management measures specified in this EA are implemented. Therefore, this EA concludes that a FONSI is appropriate, and that an EIS is not required.

SECTION 7: LIST OF PREPARERS

DEPARTMENT OF VETERANS AFFAIRS STAFF

Ms. Arlee Fisher
Facility Planner
VA Sierra Nevada Healthcare System
Department of Veterans Affairs

Mr. Michael Rowley
Facility Engineer
VA Sierra Nevada Healthcare System
Department of Veterans Affairs

Mr. Doug Roaldson
Environmental Program Manager
VA Sierra Pacific Network (VISN 21)
Department of Veterans Affairs

TTL ASSOCIATES, INC. (CONSULTANTS)

Name	Role	Degree	Years of Experience
Paul J. Jackson	Site Reconnaissance, Document Preparation, Affected Environment, Environmental Impact Analysis, and Scoping Coordination	B.A., Biology/English 1992	17
Robin J. Clark	Site Reconnaissance, Project Manager, Technical Lead, Technical QA/QC Review, Program Management/Project Coordination	B.S., Aquatic Environments/ Environmental Science, 1985	30

SECTION 8: REFERENCES CITED

A Historic Context for the Wells Neighborhood, Reno, Nevada, Summit Envirosoultions, Inc., July 2014.

CEQ Revised Draft Guidance for Federal Agencies' Consideration of Greenhouse Gas Emissions and Climate Change Impacts in NEPA, December 2014.

City of Reno Land Development Code, 2015 and 2016.

Clean Air Act of 1970 (42 USC 7401 *et. seq.*; 40 CFR Parts 50-87) Section 176(c).

Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 *et seq*.); Sections 401 and 404

Cultural and Historic Resources Survey, VA Sierra Nevada Healthcare System. Diablo Green Consulting, Inc., 23 February 2015.

Draft Environmental Assessment, VA Sierra Nevada Healthcare System, Reno Campus Clinical Expansion and Building 1 Seismic Upgrade, Klienfelder, Inc., June 2016.

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EO 11990, *Protection of Wetlands* May 24, 1977.

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EO 13112, *Invasive Species* February 13, 1999.

EO 13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000.

EO 13423, *Strengthening Federal Environmental, Energy, and Transportation Management,* January 24, 2007.

EO 13514, Federal Leadership in Environmental, Energy, and Economic Performance, October 2009.

Energy Independence Security Act (EISA) Section 438, 2007.

Farmland Protection Policy Act (FFPA) (7 USC 4201, *et seq.*).

Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map No. 32031C303G, 16 March 2009.

Federal Memorandum, *Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators*, June 2014.

Final Environmental Assessment, Proposed Acquisition of Land for the Construction and Operation of Surface Parking Lots and Proposed Modification of Kirman Avenue for the VA Sierra Nevada Healthcare System, TTL Associates, Inc., February 2016.

Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).

National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).

National Oceanic and Atmospheric Association, 2015.

Native American Graves Protection and Repatriation Act, as amended (NAGPRA) (25 USC 3001 et seq.).

Nevada Administrative Code, 2015 and 2016.

Nevada Department of Conservation and Natural Resources, Conservation Districts Program, 2015 and 2016.

Nevada Department of Conservation and Natural Resources, Division of Forestry, 2015 and 2016.

Nevada Department of Conservation and Natural Resources, Natural Heritage Program, 2015 and 2016.

Nevada Department of Conservation and Natural Resources, State Historic Preservation Office (SHPO), 2015 and 2016.

Nevada Department of Conservation and Natural Resources, Division of Water Resources, 2015 and 2016.

Nevada Division of Environmental Protection, Bureau of Air Pollution Control, 2015 and 2016.

Nevada Division of Environmental Protection, Bureau of Corrective Actions, 2015 and 2016.

Nevada Division of Environmental Protection, Bureau of Waste Management, 2015 and 2016.

Nevada Division of Environmental Protection, Bureau of Safe Drinking Water, 2015 and 2016.

Nevada Division of Environmental Protection, Bureau of Water Pollution Control, 2015 and 2016.

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Supporting the Health of Honey Bees and Other Pollinators Sustainable Landscape Guidance, October 22, 2014.

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US Geological Survey, 2015.

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VA Minor Project Application for VISN 21 – 654 Reno, September 2011.

VA Hospital Kirman Avenue Abandonment Traffic Analysis, Solaegui Engineers, Inc., August 2014.

VA Hospital Parking Garage Traffic Analysis, Solaegui Engineers, Inc., August 2012.

VA Sierra Nevada Healthcare System Renovation and Modernization Traffic Study Report, GHD, Inc. June 2016.

Washoe County Air Quality Management Division Air Quality Regulations, 2015 and 2016.

Other internet searches and data (accessed February 2015 – July 2016):

FEMA Flood Hazard Insurance Map, website: http://msc.fema.gov/webapp/wcs/stores/servlet

Superfund Site Information Systems, US Environmental Protection Agency, website: http://cfpub.epa.gov/supercpad/cursities.htm

USEPA Environmental & Compliance History Online (ECHO) e-database: http://www.epa-echo.gov/echo/

US Bureau of Census (2010 US Census Data): http://www.census.gov/

USDA NRCS online web soil survey: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

Various internet mapping tools to locate properties, www.mapquest.com, www.maps.google.com, www.google.earth.com, etc.

SECTION 9: LIST OF ACRONYMS AND ABBREVIATIONS

ACA	Air Compliance Assurance
ACHP	Advisory Council on Historic Preservation
AIRFA	American Indian Religious Freedom Act
AIS	Archeological Investigation Survey
amsl	above mean sea level
ARPA	Archaeological Resources Protection Act
ATC	Authorize to Construct
AQMD	Washoe County Air Quality Management Division
BEA	Bureau of Economic Analysis
bgs	Below Ground Surface
BMP	Best Management Practice
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CMP	Coastal Management Program
CO	Carbon Monoxide
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EDR	Environmental Data Resources, Inc.
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
HAP	Hazardous Air Pollutant
HCl	Hydrochloric Acid
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NCDNR	Nevada Department of Conservation and Natural Resources
NDEP	Nevada Division of Environmental Protection
NDOT	Nevada Department of Transportation
NEPA	National Environmental Policy Act of 1969
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NO_X	Nitrogen Oxides
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O_3	Ozone
OSHA	Occupational Safety and Health Administration
Pb	Lead
PM	Particulate matter
PM_{10}	Particulate matter less than or equal to 10 micrometers in aerodynamic size
$PM_{2.5}$	Particulate matter less than or equal to 2.5 micrometers in aerodynamic size
PTE	Potential to Emit
RCRA	Resource Conservation and Recovery Act
RDPW	Reno Department of Public Works
RECDD	Reno Economic Community Development Department
REDRD	Reno Economic Development and Redevelopment Department
ROI	Region of Influence
RRTC	Reno Regional Transportation Commission
SIP	State Implementation Plan
SHPO	NCDNR, State Historic Preservation Office (SHPO)
SO_2	Sulfur dioxide

SWCD	Soil and Water Conservation District
TPY	Tons per year
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans Affairs

SECTION 10: AGENCIES AND INDIVIDUALS CONSULTED

Agencies Consulted

U.S. Fish and Wildlife Service
Nevada Fish and Wildlife Office
1340 Financial Boulevard, Suite 234
Reno, Nevada 89502-7147
Phone: (775) 861-6300

US Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, California 94105
Phone: (415) 947-8702

US Army Corps of Engineers – Sacramento District
Public Affairs Office
1325 J Street - Room 1513
Sacramento, California 95814
Phone: (916) 557-5100

Nevada Division of Environmental Protection
Bureau of Air Pollution Control
901 So. Stewart St., Suite 4001
Carson City, Nevada 89701
Phone: (775) 687-9349

Nevada Division of Environmental Protection
Bureau of Corrective Actions
901 So. Stewart Street, Suite 4001
Carson City, Nevada 89701
Phone: (775) 687-9374

Nevada Division of Environmental Protection
Bureau of Waste Management
901 So. Stewart Street, Suite 4001
Carson City, Nevada 89701
Phone: (775) 687 - 9461

Nevada Division of Environmental Protection
Bureau of Safe Drinking Water
901 So. Stewart Street, Suite 4001
Carson City, Nevada 89701
Phone: (775) 687 – 9518

Nevada Division of Environmental Protection
Bureau of Water Pollution Control
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701-5249
Phone: (775) 687-9418

Nevada Department of Conservation and Natural Resources
Conservation Districts Program
901 S. Stewart Street, Suite. 1003
Carson City, Nevada 89701
Phone: (775) 684-2700

Nevada Department of Conservation and Natural Resources
Division of Forestry
2478 Fairview Drive
Carson City, Nevada 89701
Phone: (775) 684-2500

Nevada Department of Conservation and Natural Resources
Natural Heritage Program
901 S. Stewart Street, Suite 5002
Carson City, Nevada 89701-5245
Phone: (775) 684-2900

Nevada Department of Conservation and Natural Resources
State Historic Preservation Office (SHPO)
901 S. Stewart Street, Suite 5004
Carson City, Nevada 89701-4285
Phone: (775) 684-3448

Nevada Department of Conservation and Natural Resources
Division of Water Resources
901 S. Stewart Street, Suite 2002
Carson City, Nevada 89701
Phone: (775) 684-2800

Nevada Department of Transportation
1263 South Stewart Street
Carson City, Nevada 89712
Phone: (775) 888-7000

USDA Natural Resource Conservation Service
Nevada State Office
1365 Corporate Boulevard
Reno, Nevada 89502-7102
Phone: (203) 287-8038

Washoe County Air Quality Management Division
1001 E. 9th Street, Building B, Suite 171
Reno, Nevada 89512
Phone: (775) 784-7200

Reno Economic Community Development Department
Ms. Claudia C. Hanson, AICP
Planning & Engineering Manager
1 East First Street
Reno, Nevada 89501
Phone: (775) 334-2381

Reno Economic Development and Redevelopment Department
1 East First Street
Reno, Nevada 89501
Phone: (203) 937-3590

Reno Department of Public Works
Ms. Charla Honey
Public Works Engineering Manager
1 East First Street
P.O. Box 1900
Reno, Nevada 89505
Phone: (775) 334-2350

Reno Department of Public Works
Mr. Steve Bunnell
Public Works Traffic Engineer
1 East First Street
P.O. Box 1900
Reno, Nevada 89505
Phone: (775) 334-2350

Reno Regional Transportation Commission
Mr. David Jickling
Director of Public Transportation and Operations
P.O. Box 30002
Reno, Nevada 89520
Phone: (775) 348-0400

Federally-Recognized Tribes Consulted

Lovelock Tribal Council
P.O. Box 878
Lovelock, Nevada 89419

Summit Lake Paiute Tribal Council
Mr. Steven Frank, Chairman
653 Anderson Street
Winnemucca, Nevada 89445

Winnemucca Tribal Council
P.O. Box 1370
Winnemucca, Nevada 89446

Yomba Tribal Council
HC61, Box 6275
Austin, Nevada 89310

Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation
Tildon Smart, Chairperson
P.O. Box 457
McDermitt, Nevada 89421

Paiute Shoshone Tribe of the Fallon Reservation
Mr. Nathan Strong
565 Rio Vista Road
Fallon, Nevada 89406

Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada
Mr. Len George
565 Rio Vista Road
Fallon, Nevada 89406-9159

Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation
Mr. Elwood Lowery
P.O. Box 256
Nixon, Nevada 89424

Reno Sparks Indian Colony
Mr. Arlan Melendez
98 Colony Road
Reno, Nevada 89502

Reno Sparks Indian Colony
Tribal Historic Preservation Office
Cultural Resources Program
Michon R. Eben, THPO
1995 E. Second Street
Reno, Nevada 89502

Walker River Paiute Tribe of the Walker River Reservation
Mr. Bobby Sanchez
P.O. Box 220
Schurz, Nevada 89427

Washoe Tribe of Nevada and California
Mr. Neil Mortimer
919 Highway 395 South
Gardnerville, Nevada 89410

Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch
Ms. Linda Howard
171 Campbell Lane
Yerington, Nevada 89447

SECTION 11: LIST OF ENVIRONMENTAL PERMITS REQUIRED

11.1 Regulatory Framework

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and 38 CFR Part 26. In addition, the EA has been prepared as prescribed in VA's *NEPA Interim Guidance for Projects* (VA 2010). Federal, State, and local laws and regulations specifically applicable to this Proposed Action are specified, where appropriate, within this EA, and include:

- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Endangered Species Act (ESA) of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Native American Graves Protection and Repatriation Act, as amended (NAGPRA) (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- Federal Clean Air Act (CAA) of 1990 (42 USC 7401 *et seq*., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 *et seq*.); Sections 401 and 404.
- Executive Order 11988, *Floodplain Management* (24 May 1977).
- Executive Order 11990, *Protection of Wetlands* (24 May 1977).
- Executive Order 12898, *Environmental Justice* (11 February 1994).
- Executive Order 13514/Energy Independence Security Act (EISA) Section 438.
- Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* (24 January 2007).
- Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance* (5 October 2009).
- Nevada Administrative Code (NAC).
- Reno Land Development Code.

- Truckee Meadows Stormwater Quality Management Program National Pollution Discharge Elimination System.

11.2 Environmental Permits Required

In addition to the regulatory framework of the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, 38 CFR Part 26, and VA's *NEPA Interim Guidance for Projects,* the following Federal, State, and/or local environmental permits are required as part of this Proposed Action, and include:

- Truckee Meadows Stormwater Quality Management Program National Pollution Discharge Elimination System permit.
- Washoe County Air Quality Management Division permit.
- Construction Emissions Mitigation Plan.
- NESHAP and AQMD permits for the removal of ACMs.
- Permits from the utility providers for capping/disconnecting the existing utility services prior to building demolition.

SECTION 12: GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

Criteria Pollutants - The CAA of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), nitrogen dioxide (NO_2), and particulate matter.

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

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

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

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

Emission - A release of a pollutant.

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

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

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

Farmland - Cropland, pastures, meadows, and planted woodland.

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

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

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

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

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

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

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

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

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

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

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

Any toxic pollutant listed under TSCA.

Any hazardous air pollutant listed under Section 112 of CAA.

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

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR 302.4.

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

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

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

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

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

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

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

Listed Species - Any plant or animal designated as a State or Federal threatened, endangered, special concern, or candidate species.

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

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

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

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter, and sulfur dioxide (SO_2).

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

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

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

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

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

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

Potable Water - Water which is suitable for drinking.

Prime Farmland - A special category of highly productive cropland that is recognized and described by the US Department of Agriculture's Soil Conservation Service and receives special protection under the Surface Mining Law.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX A

Agency Correspondence

APPENDIX B

Photograph Logs

APPENDIX C

Other Relevant Environmental Data

APPENDIX D

Public Notices and Comments