
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
DEPARTMENT OF VETERANS AFFAIRS
PROPOSED RENOVATION AND MODERNIZATION OF THE
VA SIERRA NEVADA HEALTHCARE SYSTEM CAMPUS
975 KIRMAN AVENUE
RENO, WASHOE COUNTY, NEVADA

Introduction

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

The **purpose** of the Proposed Action is to provide 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 nationally and the VASNHCS have made a strong 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 in concert with the large Veteran population has resulted in a 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.

1. Description of the Proposed Action and Alternatives

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 and management measures identified in the EA into the design process to ensure potential environmental effects are maintained at less-than-significant levels.

Alternatives Considered

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.

The EA examined 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 the existing VASNHCS campus facilities. The following projects are included within 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.

The No Action Alternative would not satisfy the purpose of or need for the Proposed Action. However, this No Action Alternative was assessed in the EA to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under CEQ Regulations.

2. Environmental Analysis

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

Proposed Action Alternative

The Proposed Action Alternative would result in 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 BMPs and management measures, and compliance with regulatory requirements.

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 examined 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). 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 were assessed in the EA. No other non-VA projects are known to be planned for the VASNHCS area.

This cumulative effects analysis found that implementation of the Proposed Action with the general BMPs and management measures specified in the 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.

Mitigation and Management Measures

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

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

Aesthetics. Conform with the Reno Land Development Code (RLDC), to the extent practicable, maintain landscaping along site boundaries with residences, 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.

Air Quality. Complete pre-demolition asbestos surveys for each building proposed for renovation/demolition, remove asbestos-containing materials (ACM) prior to building renovation/demolition, use dust suppressants during demolition, develop and implement a Construction Emissions Mitigation Plan (CEMP) to reduce impacts from fugitive dust and diesel

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

Cultural Resources. Finalize the Programmatic Agreement (PA) and/or other Section 106 regulatory mechanisms in conjunction with the Nevada SHPO and comply with their requirements.

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

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

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

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

Solid and Hazardous Materials. Complete predemolition asbestos surveys, remove ACM and damaged/peeling lead-based paint (LBP) prior to demolition, empty and remove the diesel underground storage tank (UST) associated with the north campus backup power generator and remediate any identified associated soil contamination.

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.

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

3. Regulations

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

4. Commitment to Implementation

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

5. Agency and Public Involvement

VA has consulted with appropriate Federal, State, and local regulatory agencies, and has sought consultation with federally recognized Native American Tribes identified as having

ancestral ties to the VASNHCS area. This consultation is documented in the Final EA. Concerns expressed by pertinent regulatory agencies and tribes have been addressed in the Final EA.

In addition, VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in *The Reno Gazette-Journal* 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. The Final EA was modified to reflect these comments.

USEPA also commended VA for its environmental justice approach for the Land Acquisition Project (only acquiring parcels from willing sellers and providing relocation assistance).

No other public comments were received regarding the Draft EA.

6. Finding of No Significant Impact

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

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

Date

10/5/16


Ms. Lisa Howard
VASNHCS Director
Department of Veterans Affairs