FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED LAND ACQUISITION FOR A NEW VETERANS SUBSTANCE ABUSE RESIDENTIAL REHABILITIATION TREATMENT PROGRAM FACILITY
ASHEVILLE, BUNCOMBE COUNTY, NORTH CAROLINA

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 Action to acquire approximately 8.3 acres of land located adjacent to the Charles George VA Medical Center in Asheville, North Carolina (Asheville VAMC) for the development of a new Veterans Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility. 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 *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26).

The purpose of the Proposed Action is to enhance and expand SARRTP services to Veterans in the Asheville, North Carolina area by providing a new, larger, more appropriately configured space via relocation of the existing SARRTP services. Relocation of the SARRTP services would enable the VA to provide additional group therapy rooms, kitchen facilities for daily living instruction, and private and semi-private rooms for Veterans. Relocation of the SARRTP services outside of the main Asheville VAMC campus would enhance Veteran residential treatment by providing outside courtyards and recreational space vital to the SARRTP mission for Veteran rehabilitation.

The Proposed Action is needed to address current and future projected SARRTP capacity and space requirements and to address existing facility deficiencies. The existing SARRTP space is overcrowded, space-constrained, and inadequately configured (shared toilet space, congregate showers, etc.). Expansion of the SARRTP within the existing VAMC hospital is not possible due to increasing Veteran health care needs and lack of space at the Asheville VAMC hospital building. In addition, the current SARRTP location within the main hospital building does not provide an adequate residential setting or required square footage to promote treatment. It is estimated that approximately 22,746 square feet of space is needed for the SARRTP; however, the existing SARRTP space is only approximately 10,000 square feet.

The Proposed Action would result in improved substance abuse rehabilitation care for Asheville area Veterans by providing expanded and enhanced SARRTP services in a new, larger, modern facility and would allow for re-use of SARRTP occupied space at the main hospital building for needed specialty care services.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action is to reacquire an approximately 8.3-acre parcel of land (Site) located adjacent to the northwest of the Asheville VAMC campus and to rehabilitate the existing two to three-story, approximately 23,000-square foot, vacant Site building for a new, expanded SARRTP facility. Existing SARRTP operations at the Asheville VAMC campus would be transferred from their current undersized space in the main hospital building to the new facility. VA would use the existing SARRTP space to expand specialty care services at the Asheville VAMC.

Alternatives Considered

After identifying the inadequacies of the existing SARRTP facility in the main Asheville VAMC hospital building, VA evaluated other potential spaces within existing Asheville VAMC campus buildings for an expanded SARRTP facility. No suitable space was identified in the over-crowded and space-constrained VAMC buildings. In addition, VA determined the new SARRTP facility would be better suited outside of the main hospital building at a facility with outside space to promote residential treatment.

Based on this evaluation, VA initially planned to construct a new building at the Asheville VAMC campus to house the SARRTP. Subsequently, the approximately 8.3-acre Site located adjacent to the northwest of the Asheville VAMC was offered to VA for purchase. The Site was originally part of the Asheville VAMC, but was divested in the 1980s along with other portions of the VAMC campus that were underutilized at the time. The existing Site building is of sufficient size (approximately 23,000 square feet) and configuration for adaptive reuse as the SARRTP. In addition, the Site provides outdoor space near, but outside of the Asheville VAMC campus, that is more suited to a residential substance abuse treatment facility. Consequently, VA determined that the reacquisition of the Site and the rehabilitation of the existing, historic Site building was the only viable and reasonable alternative to fully meet the purpose of and need for the Proposed Action.

Propose Action

VA plans to reacquire the Site and rehabilitate the interior of the current Site building, located in the western portion of the Site, for use as a SARRTP facility for Asheville area Veterans. The Site building, constructed in the 1930s, was originally used as nurses' quarters and was renovated for senior living apartments in the early 1980s, but has been vacant for several years. Design plans for the proposed SARRTP facility are currently not available; however, the new space would provide additional rooms for group therapy and kitchen facilities for daily living instruction, and private and semi-private rooms with private toilet/shower facilities for approximately 25 inpatient residents. No additions or substantial exterior alterations to the Site building are planned. VA intends to re-use the existing parking areas, access drive and utilities at the site. No development or modification is planned for the eastern and central portions of the Site.

VA would reacquire the Site and begin the new SARRTP design in 2020. It is anticipated that the Site building would be rehabilitated for the SARRTP in 2021. The new SARRTP facility would provide substance abuse rehabilitation health care services to the area's Veterans. SARRTP services currently provided in the Asheville VAMC main hospital building would be relocated to the new SARRTP facility. VA would expand specialty care services into the current SARRTP space.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. VA would continue to provide SARRTP services at the overcrowded and space-constrained Asheville VAMC main hospital building. The Site likely would remain unused in the near future and ultimately be developed by others for other commercial or residential use, in accordance with local zoning. This alternative would limit VA's ability to provide necessary substance abuse health care services to Veterans in the region, and would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was retained to provide a comparative baseline analysis as required under the CEQ Regulations.

2. Environmental Analysis

Environmental Consequences

Proposed Action

Based on the analyses contained in the Final EA, the Proposed Action would result in short-term and/or long-term potential adverse impacts to air quality, cultural resources, noise, solid waste and hazardous materials, and transportation. All of these impacts are less than significant and would be further reduced through careful coordination and implementation of general best management practices (BMPs) and management measures, and compliance with regulatory requirements, as identified in the Final EA.

The Proposed Action would result in beneficial short-term and long-term impacts to the local socioeconomic environment. Notably, a significant long-term beneficial effect to the health of Veterans in the region would occur should the new SARRTP facility be operated at the Site.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented and no improvements to the current level of VA's SARRTP services or capability would occur. No beneficial impacts attributable to the Proposed Action would occur and VA's ability to provide sufficient, requisite SARRTP services to the region's Veterans would be compromised.

Cumulative Impacts

This EA also examined potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Proposed Action, with the implementation of general BMPs and management measures, and compliance with regulatory requirements specified in the Final EA, would not result in significant adverse cumulative impacts to onsite or regional natural or cultural resources, and would maintain or enhance the socioeconomic environment of the area through long-term provision of additional health care services to the region's Veterans. The No Action Alternative would not produce these potential positive socioeconomic gains. No significant cumulative effects are identified.

Management and Minimization Measures

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

The BMPs, management measures, and regulatory compliance measures summarized in the attached table (Appendix A) will be included by VA in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

3. Regulations

The Proposed Action will not violate NEPA, the CEQ Regulations, VA's NEPA regulations, or other federal, state, or local environmental regulations. This will be achieved by implementing the BMPs, management measures, and regulatory compliance measures described above and included in the attached table (Appendix A).

4. Commitment to Implementation

VA affirms its commitment to implement the BMPs, management measures, and regulatory compliance measures identified in the Final EA and this Finding of No Significant Impact (FONSI) in accordance with NEPA, the CEQ regulations, and VA's NEPA regulations. 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 federally recognized Native American Tribes identified as having possible ancestral ties to the Asheville, Buncombe County, North Carolina area. This consultation is documented in the Final EA. Concerns expressed by pertinent regulatory agencies and Tribes have been addressed in the Final EA.

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability published in The Asheville Citizen-Times on December 21, 22, and 25, 2019. Copies of the Draft EA were made available for public review at Pack Memorial Library in Asheville and the Asheville VAMC. VA received no public comments regarding the Draft EA.

6. Finding of No Significant Impact

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

Therefore, per NEPA, the CEQ Regulations, and VA's NEPA regulations, I am signing this FONSI. This analysis fulfills the requirements of NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared.

STEPHANIE A. YOUNG 269422

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Date: 2020.02.07 08:26:58 -05'00'

Date

Stephanie Young
Director
Charles George VA Medical Center
Department of Veterans Affairs

Best Management Practices, Management Measures, and Regulatory Compliance Measures Incorporated into the Proposed Action

Technical Resource Area	Best Management Practices and Management/Compliance Measures
Aesthetics	Comply with the City of Asheville's Unified Development Ordinances and development standards, to the extent practicable.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust palliative, and covers) during onsite construction/rehabilitation activities.
	Implement measures to reduce diesel particulate matter (DPM) emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Comply with the applicable North Carolina Department of Environmental Quality (NCDEQ) and Western North Carolina Regional Air Quality Agency (WNCRAQA) air quality regulations. Secure any required minor air emissions permits from NCDEQ and/or WNCRAQA prior to rehabilitation.
Cultural Resources	Complete Site building rehabilitation design and construction in accordance with the Secretary of Interior's Standards for Rehabilitation, as applicable, to maintain its historic integrity.
	Provide the North Carolina State Historic Preservation Office (NC SHPO) site plans for review and comment during the design development, schematic, and final design phases. Ensure NC SHPO is provided a minimum of 30 days to review and comment on the proposed plans.
	If Site design includes significant ground disturbance (not anticipated), complete additional assessment of potential impacts to archaeological resources and consult with NC SHPO and the Catawba Indian Nation, as required.
Geology, Topography, and Soils	None required.
Hydrology and Water Quality	None required.
Wildlife and Habitat	None required.

Technical Resource Area	Best Management Practices and Management/Compliance Measures
Noise	Comply with the City of Asheville noise regulations, to the extent practicable.
	Coordinate proposed construction activities in advance with nearby 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.
	Limit, to the extent possible, construction and rehabilitation activities and associated heavy truck traffic to occur between 7:00 a.m. and 7:00 p.m. on Monday through Saturday.
	Locate stationary operating 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 equipment per manufacturer's recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, engine speed restrictions).
Land Use	Comply with the City of Asheville's Unified Development Ordinances and development standards, to the extent practicable.
Wetlands, Floodplains, and Coastal Zone Management	None required.
Socioeconomics	None required.
Community Services	None required.
Solid Waste and Hazardous Materials	Complete asbestos, lead-based paint, and mold surveys of the Site building prior to rehabilitation. Identified asbestos-containing materials (ACM), lead-based paint (LBP) and mold would be removed/managed in accordance with federal and state requirements.
	Complete a radon gas survey of the Site building. Install a radon gas mitigation system in the building, if necessary.
	Comply with VA Standard Operating Procedures and applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid waste, hazardous materials, and medical wastes.

Technical Resource Area	Best Management Practices and Management/Compliance Measures
Transportation and Parking	Work with North Carolina Department of Transportation (NCDOT) and the City of Asheville, as applicable, during the SARRTP facility design to identify and implement roadway improvements, if necessary.
	Coordinate with NCDOT and the City of Asheville, as applicable, to ensure that rehabilitation and operational traffic are considered in the planning of future transportation improvements in this vicinity.
	Ensure construction/rehabilitation activities do not adversely affect traffic flow on local roadways.
	Ensure debris and/or soil is not deposited on local roadways during construction activities.
Utilities	Submit detailed design plans to each utility provider to determine the specific connection/service requirements and implement the necessary requirements.
Environmental Justice	None required.