



**U.S. Department of Housing and Urban
Development**

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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Nevada Cares Campus Project

Responsible Entity: Washoe County

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: The site address is 1800 Threlkel Street, Reno, NV (APNs 008-211-47, 008-211-48, 008-211-050, and 008-211-51)

Preparer: Washoe County

Certifying Officer Name and Title: Dwayne Smith, Director, Engineering and Capital Projects
Community Services Department

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Gail M. Ervin, Ph.D., NCE

Direct Comments to:

Timber Weiss, PE
Washoe County
1001 E. 9th Street, Bldg. A
Reno, NV 89512

Project Location:

The project encompasses approximately 18.17 acres in the City of Reno (City), adjacent to the “Spaghetti Bowl” interchange at I-80 and SR395. The site address is 1800 Threlkel Street, Reno, NV (APNs 008-211-47, 008-211-48, 008-211-050, and 008-211-51). See Figure 1 and Figure 2 at the end of this document.

The USGS Quadrangle is Reno, Nevada. The project is within Township 19N, Range 19E and Sections 1 and 12.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Nevada Cares Campus Project (project) is designed to help unhoused individuals and families receive mental health support and alternative shelter options. Respect is given to individuals’ different needs and the campus is designed to help create community. The cities of Reno and Sparks, and the County of Washoe (County) recognize the need for government involvement in what has become a major housing and social problem.

The total cost of the project is currently \$71 million. The County is contributing 68.37%, the City of Reno 21.44%, and the City of Sparks 10.19%. Multiple funding sources are being pursued, and the County has received conditional approval for \$12 million in Community Project Funding (CPF)/Congressional Directed Spending, through a Department of Housing and Urban Development (HUD) Economic Development Initiative grant. This funding is subject to HUD National Environmental Policy Act (NEPA) requirements, the purpose of this document.

In keeping with HUD’s NEPA-implementing regulations at 24 CFR Part 58, environmental reviews must be completed, and a Request for Release of Funds and Certification must be approved by HUD, as applicable, for all projects prior to taking any ‘choice limiting actions.’ This step is required to avoid violations under 24 CFR 58.22, which provides limitations on activities pending clearance, and Section 110(k) of the National Historic Preservation Act, which prohibits anticipatory demolition or significant harm of historic properties prior to completion of the historic preservation review process known as Section 106 review. Examples of ‘choice limiting actions’ include, but are not limited to, purchasing land, entering contracts for property acquisition or construction, or physical work on the project.

The project was designed for four phases. Prior to the commitment of federal funding, Phase 1 was completed to meet immediate needs in 2020 on parcels 008-211-47, -48, and 51. A 45,900 square foot (sf) shelter (Sprung building) opened on May 17, 2021, and 50 temporary housing modular units installed in the “Safe Camp” began operation in January 2022. Phase 2 provides for construction of two restroom buildings adjacent to the shelter building; one is complete, and the other was under contract in March 2022. The project was “federalized” as of July 18, 2022. This is also referred to as the federal ‘nexus’ date for environmental review for CPF projects. This means that the Campus phases constructed and contracted prior to the federal nexus date, Phases 1 and 2, may proceed before NEPA review is complete. However, all choice limiting activities subsequent to this date may not proceed until the Authority to Use Grant Funds (AUGF) is issued. This environmental assessment (EA) provides review of the full Campus regardless of the federal nexus date, which means that appropriate mitigation measures may still be applied to non-federalized portions of Phase 1 and Phase 2 as appropriate and feasible.

Future phases would occur on APN 008-211-50, located at 1775 E. 4th Street, Reno, Washoe County, Nevada 89512, between Line Drive and Threlkel Street. This parcel includes 4.747 acres of land and 37,360 sf of total building area, an office building, service repair building, RV storage building, and a

metal storage building. The parcel is directly adjacent to the other Washoe County properties intended to support the Nevada Cares Campus and Safe Camp facilities. The Washoe County Board of County Commissioners accepted a Purchase and Sale Agreement on July 12th, 2022, for the appraised market value of \$5.5 million, but the sale did not close until August 31, 2022, therefore choice limiting activities on this parcel may not commence until the AUGF is issued.

The Campus will eventually provide up to 1,100 beds and services for the unhoused. Additional phases are in various stages of development and review, as described below. Subsequent construction phases will include a day use area, social worker support areas, and internet and broadband infrastructure. In addition to bringing services to the Campus, enhancements include improving the arrival experience to include a diversion program and appropriate case manager ratios. The Campus will employ about 175 people at buildout. The project will incorporate various environmental mitigations including:

- High efficiency LED street and area lights will be used throughout.
- Waste bins and recycling bins are on site for residents.
- Native and drought-resistant trees will be planted.
- Secure bike parking will be provided at numerous locations.

Phase 1

Status – Shelter completed in June 2021 by the City of Reno. Safe Camp to be completed November 2022.

Description - Phase 1 constructed a 45,900 sf (80' x 576') Sprung structure to meet the immediate needs of the unhoused population. The approximate cost of this phase was \$18 million which included site acquisition. Substantial site improvements were needed for construction including utilities, and the export of non-structural fill and the import of structural fill for the building pad. Fifty temporary housing modular units (8 feet by 8 feet by 8 feet ModPods) were purchased and installed in Spring 2022 at the Safe Camp site.

Phase 2

Status – Phase 2 started construction March 10, 2022 and is currently underway. The Restroom A building pad is complete, and utilities are currently being placed. Electrical work is concurrently being installed inside the Sprung structure for cubicles that provide a measure of privacy. This Phase is on schedule to date.

Description – This Phase involves constructing two 3,374 sf restrooms, shower and laundry facilities, concrete floor sealing in the Sprung structure, and providing and installing personal living cubicles as well as utility infrastructure to support the new buildings. Additional temporary shelter space is being created using existing shade tents for feeding occupants. Overflow space is being created in the existing metal storage building. This involves 153 cubbies and 186 bunks, for a total capacity of 525 people. There will be 26 laundry units, 36 shower units, and 54 toilets.

Phase 3

Status – This phase reached 100% design as of August 10, 2022. Next, the plans will be submitted for City building permit plan review process. After plan review and conditional use permits are approved, Washoe County in partnership with Clark Sullivan Construction will begin the bidding phase in

December 2022. Contracts will not be signed until NEPA is complete and the AUGF is received. The anticipated construction start date is July 20, 2023.

Description - Phase 3 consists of construction of a 15,143 sf Intake Center and includes site work, landscaping, fencing, roadway and parking lots, and utilities infrastructure. The Intake Center will process participants into the shelter, provide a security check point, nurses station, case management, counseling, staff offices, break room, warming kitchen, indoor and outdoor dining facilities, and security offices. This Phase requires demolition of existing structures on the site. An existing storage building will be remodeled to create a 18,175 sf Resource Center. This Center will provide overflow sleeping areas, restrooms, shower and laundry facilities, storage and facilities management space, fencing, and parking.

Phase 4

Status – Phase 4 is currently in the schematic design phase. Detailed outlines of the project are being developed. The design should move into design development phase in August 2022. Construction documents will be completed in November 2022, followed by the City Plan Review process in December 2022. After plan review and conditional use permits are approved, Washoe County, in partnership with Clark Sullivan Construction, will begin the bidding phase in February 2023. Contracts will not be signed until NEPA is complete and the AUGF is received. The anticipated construction start date is July 20, 2023.

Description – Phase 4 constructs two buildings, a 3,583 sf Day Center, and a 3,937 sf General Administration building.

The site plan, and phasing, are provided at the end of this document.

Phase 5

Status – In addition to the emergency shelter needs, a significant portion of the proposed County Capital Improvement Plan costs (approximately \$20 million) is designated for up to 50 units of residential supportive housing. This is a part of the affordable housing spectrum and is an enumerated allowable use included in the U.S Department of the Treasury’s Final Rule regarding State and Local Fiscal Recovery Funds. Washoe County has a severe lack of affordable housing for extremely low-income individuals in need of wrap around supportive services. The region is well over 20,000 units short for affordable rental housing available to low-income residents and there are hundreds of Washoe County households in need of very low rent housing with supportive services available. The community queue in the region’s Homeless Management Information System is currently tracking well over 200 chronically homeless individuals in need of supportive housing. The cost is based on Nevada Housing Division estimates that it costs between \$250-300k per unit to build affordable housing (not including land costs) in Washoe County. The County is currently waiting on Grant approval for this phase.

Phase 6 – Future Supportive Housing

This property will be offered to a non-profit housing developer for construction of permanent supportive housing. The site will be prepared, and utility connections provided as a part of Phase 3.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The Nevada Cares Campus is a regional collaborative effort to centralize homeless services while providing adequate spacing for social distancing and service provision. The 15-acre property was purchased in 2020 and the 46,000 square foot shelter opened on May 17, 2021. The HUD funding would

expand upon the initial phase of the newly constructed shelter and will include a day use area, safe camping location, and internet and broadband infrastructure.

The Nevada Cares Campus was originally established to provide additional emergency shelter space and to offer ‘wrap around’ services on site, in cooperation with local service providers. Wrap around is a social work strategy that focuses away from a traditional service-driven, problem-based care approach and instead follows a strengths-based, needs-driven approach. The intent is to build on individual and family strengths to help families achieve positive goals and improve well-being. The initial goal of the Nevada Cares Campus is to provide housing-focused case management. The ultimate goal is to move clients to stable independent housing. Phases 3 and 4 will include a diversion program, appropriate case manager ratios, mental health support, and alternative shelter options.

The Washoe County Housing Element is part of the Washoe County Master Plan and identifies housing needs and establishes goals, policies, and programs for all residents. According to Policy 5.5 in the Housing Element, Washoe County “will participate in efforts to improve the continuum of available housing throughout the County so that homeless individuals and families have access to appropriate housing resources, ultimately establishing a “housing first” model. The project qualifies as housing resources for homeless individuals, therefore the project fits into this Policy and is consistent with the County’s goals and policies stated in the Housing Element.

Existing Conditions and Trends [24 CFR 58.40(a)]:

Compounded by the pandemic, the homelessness crisis is one of the greatest challenges facing Washoe County, as with many urban areas throughout the U.S. The local number of individuals experiencing homelessness has increased significantly due to the COVID-19 pandemic and subsequent unemployment, now further exacerbated by high inflation. These factors spur housing insecurity and concerns of people living in encampments. Amid growing community concerns over the safety, public health and environmental concerns for the region, a concurrent meeting was held on November 18, 2020, by the Washoe County Board of Commissioners and the City of Reno and Sparks City Councils. These officials voted to share the cost to acquire three parcels on East 4th Street to expand shelter capacity and assist people experiencing homelessness.

Four parcels make up the project site, which is accessed via Threlkel Street off East 4th Street. The Campus site currently includes more than 18 acres of property. The existing site conditions are consistent with a heavily developed, urban downtown area with low plant and wildlife species diversity. The project area contains mostly paved roads, sidewalks, abandoned warehouses, parking lots, buildings operated by and associated with the Nevada Cares Campus, and an active construction and staging area associated with the Safe Camp and Support Housing on the northwest end of the site where Governor's Bowl Park was previously located. Vegetation on the site consists of rubber rabbitbrush (*Ericameria nauseosa*) on the slopes of Governor's Bowl Park, firethorn (*Pyracantha coccinea*) along Line Drive, and sparse scattered trees including lodgepole pine (*Pinus contorta*), elms (*Ulnus sp.*), and blue spruce (*Picea pungens*).

Phase 1 constructed a 45,900 sf emergency shelter, 50 temporary shelter modular units, various modular administrative buildings, on-site laundry, and a temporary area for participants to eat meals. Phase 2 restrooms are under construction. Several existing structures are located on the future phase areas of the site. The existing 8,400 sf transit warehouse in the eastern portion of the site was developed in 1964 and the existing storage building was developed within the southern portion of the site in 1999. The Wells RV Office is a brick building built in 1943. The transit warehouse, existing storage buildings and existing

brick structure between the two larger buildings are planned to be demolished, as well as a shed to the north of the storage building. The exterior storage yards on the site have been utilized for truck and RV parking, and parts of the eastern portion of the site are used for construction storage.

The service garage building within the northern portion of the site includes vehicle servicing bays, storage areas, offices and administrative areas, a spray-painting booth, and areas converted into a gym and an indoor batting range. The vehicle servicing areas include two vehicle service pits. The storage room east of the service pits is understood to be the location of six former new and used oil USTs which have been closed in-place. Three additional USTs were located to the north and east of this area, along the exterior of the building but have been removed (McGinley & Associates, October 2020).

Surrounding land uses include commercial properties and several major freeways. North of the project is the I-80 Highway and East of the project is the SR395 Highway. The buildings on the site were recorded in 2017 by Mead & Hunt, Inc as a part of the Spaghetti Bowl project analysis. None were identified as historic resources. An initial records search indicated that the area surrounding the project site contains five separate transportation related Historic Districts. Two nearby motels have been identified as being individually eligible for National Register of Historic Resources (NRHR) listing, and thirteen nearby properties have been identified as being contributing elements of Historic District D264 - Lincoln/Victory/US-40 Highway, East 4th Street (Threlkel Street to Montello Street Roadside Architecture Historic District).

Public transportation is provided by the Regional Transportation Commission (RTC) of Washoe County RIDE. There are bus stops on either side of East 4th Street and Threlkel Street for Bus 11, which runs in 30-minute or 1-hour intervals depending on the time of the day.

Funding Information

Grant Number	HUD Program	Funding Amount
B-22-CP-NV-0629	FY2022 Community Project Funding	\$12,000,000

Estimated Total HUD Funded Amount:

\$12,000,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

\$71,000,000

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is located approximately 1.5 miles away from the closest civilian airport (Reno International Airport) and is not within a Runway Potential Zone/ Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ). No military airports were identified within 15,000 feet of the project site. Exhibit 2-A
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Nevada does not contain protected coastal barrier resources. Exhibit 2-B
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is located within Zone X, an area of minimal flood hazard, per FEMA panel 32031C3045G effective 3/16/2009. No flood insurance is required. Exhibit 2-C
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Washoe County ambient air exceeded federal carbon monoxide (CO) standards from 1992 to 2003, and the county was designated “non-attainment.” Most standard violations occurred in winter when atmospheric mixing is diminished. The primary source of this CO was motor vehicles, although other sources such as wood burning stoves and natural gas combustion contributed to the unhealthy air. Various measures such as improved

inspection and maintenance (smog check), winter gasoline blends, and phase out of old vehicles led to air quality improvements. EPA also instituted standards for wood stoves that substantially reduced winter emissions. Washoe County has met the federal CO standard since 2004 and is now designated a federal “maintenance area.” According to the de minimis tables in 40 CFR 93.153.(b)(1), CO emissions of up to 100 tons per year are acceptable in maintenance areas. Emissions over 100 tons per year would require various levels of modeling, review, and possibly permitting by the local health authority.

Washoe County is designated “attainment” for all other pollutants.

To determine if annual construction emissions would exceed 100 tons/year, they have been estimated using the air quality model CalEEMod v2022. This model was developed by the California Air Pollution Control Officers Association and is recognized as an appropriate tool for calculating CO (and other) emissions from construction projects. Since the model requires a California location, Truckee, CA was use as a geographic surrogate for the Reno site. Both locations use similar construction equipment and fuel types, so CO emission rates would be similar. As noted in the project description, part of the Washoe Cares project has already been constructed. Future housing and support facilities will be built over the coming year(s). CO modeling looks at the cumulative effects of all five phases of the project and is reported for each year.

Modeled results of construction CO emissions show the following: 6 tons/year in 2021, 11 tons/year in 2022 and 3 tons/year in 2023. Total cumulative construction CO emissions over the three years is 20 tons. Each year’s emissions are well below the 100 tons/year de minimis threshold in federal law for CO maintenance areas.

Operation CO emissions result from staff commuting in private autos, electricity generation, natural gas combustion, and water consumption (pumping and treatment), trash removal and land fill emissions, and other small sources. Operations are estimated at 7 ton/year for 2023 and subsequent years.

Therefore, the project will not exceed de minimis or threshold emissions or screening levels, so it is not significant.

Exhibit 2-D

<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project is in Reno, Nevada approximately 137 miles inland from the coast and is not within a coastal zone.</p> <p style="text-align: right;">Exhibit 2-E</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Three Phase I Environmental Site Assessments (ESA) were conducted for the project site, two for the southern part of the project area, and the second for the northern part. The first two ESAs included a document review of current and historical site activities, search of environmental databases for indications of potential material releases, site reconnaissance, and interviews with site representatives to identify facilities that may have the potential to adversely impact subsurface conditions beneath the site. The southern property was found to have five 250-gallon oil underground storage tanks and one 500-gallon used oil in 1989 that were slurried and abandoned in-place. A closure letter was issued by the WCHD on April 21, 1989 with the stipulations that: 1) the depth to groundwater remains greater than 60 feet, 2) the contaminated area remains covered with an impermeable surface (asphalt), 3) the building that inhibits complete remediation remains in place, and 4) that the contamination does not migrate offsite or reach groundwater. Should these conditions change, such as the demolition of the onsite building, the WCHD may require further action.</p> <p>Whereas the building would be demolished, and the asphalt removed, the County has received a Brownsfield Grant to remove the tanks and conduct any further required remediation prior to construction of that phase of the project.</p> <p>One 10,000-gallon waste-oil UST was removed in December 1990. One 1,000-gallon gasoline UST and one 10,000-gallon diesel UST were removed in 1991. The soil was tested around the gasoline and diesel tanks for contamination and the site was issued a closure letter in 1991 stating that all of the underground storage tanks associated with the site have been closed.</p> <p>Additionally, it should be noted that a letter from the Nevada Division of Environmental protection (NDEP) dated June 11, 1992, indicated the owner of Wells Cargo had applied for coverage under the State Petroleum Fund for two leaking tanks which had been removed. However, the NDEP acknowledged that the Washoe County Health District (WCHD) was not requiring remedial action at this time and noted that the claim would remain on file. The letter stated that if action was required in the future, the owner should contact the NDEP. It is unknown at this</p>

		<p>time if this coverage would extend to another owner of the property.</p> <p>The Phase I concluded that caution should be observed during future site redevelopment. If the stipulations of the WCHD UST case closure letters are no longer met, or evidence of unknown USTs, contamination, or other subsurface features are encountered during construction activity, proper abandonment, and/or further assessment may be necessary, and a State of Nevada Certified Environmental Manager (CEM) should be consulted at that time.</p> <p>Please see attachment for Phase I Report.</p> <p>The third Phase I ESA was conducted for a portion of the project area located at 1800 Threlkel Street (Assessor's Parcel Number 008-211-47). This ESA was prepared to support the development of the project area as part of the necessary environmental due diligence for the project. The ESA activities included a document review of available information and environmental data relating to the property; interviewing readily available persons knowledgeable about the site; reviewing readily available maps, aerial photographs and records maintained by federal, state, and local regulatory agencies; and conducting a site visit. The property was found to have an approximately 2,000-yard stockpile of undocumented fill and concrete in the northwestern portion. No off-site recognized environmental conditions with the potential to impact the property were identified within the site vicinity.</p> <p>Because the area is already developed but there is no information regarding the undocumented fill, the ESA recommends conducting an investigation to evaluate soil vapor beneath the site for the presence of constituents of potential concern and apply mitigation measures as appropriate for temporary residents, and shallow soil testing beneath areas that have yet to be developed. For the soil stockpile, the ESA suggested coordinating and verifying disposal of the approximate 2,000-yard soil stockpile in the northwestern portion of the site with a predetermined disposal facility.</p> <p>A mitigation measure has been required to test for soil vapor and mitigate as appropriate and feasible in the undocumented fill area (Phase 1 and 2 non-federalized areas), and require any gardening be in raised beds only to eliminate potential pathways to unknown soil contaminants.</p>
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		<p>Additionally, McGinley and Associates, Inc. (McGinley) prepared an Underground Storage Tank (UST) Removal and Remedial Action Plan (RAP) in support of the project. The previously abandoned in place USTs will be removed during demolition and impacted soil (if encountered) will be excavated. A work plan for UST removal, impacted soil excavation, and subsequent sample collection and analysis is included Exhibit 2-F.</p> <p>The Washoe County Health District (WCHD) has reviewed the above referenced RAP. The RAP identifies steps for discovery and removal of USTs in a manner consistent with the Nevada Division of Environmental Protection (NDEP) UST Permanent Closure Requirements and Guidance document. Should significant contamination above State Action levels be encountered and the Certified Environmental Manager (CEM) recommends further remediation and corrective action, oversight of these activities will be conducted under the oversight of NDEP.</p> <p style="text-align: right;">Exhibit 2-F</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A review of special status species databases including the Nevada Natural Heritage Program, United States Fish and Wildlife Service Information for Planning and Conservation Database, and the Nevada Department of Wildlife was completed in order to identify special status species that may occur within the project area. No federally listed species were observed during the site visit on October 4, 2022. Based on the results of this review, its location within an urbanized area and the site visit, no habitat for special status species is present within or adjacent to the project area.</p> <p>However, existing trees on and adjacent to the site could provide nesting habitat for birds protected under the Migratory Bird Treaty Act. Given the presence of low-quality nesting bird habitat in the project area, mitigation measures have been required to avoid potential impacts to migratory birds and raptors during construction.</p> <p style="text-align: right;">Exhibit 2-G</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Two 50,000 gallon diesel tanks are located at 1575 E. Commercial Row and a 1,411 ft radius of impact for Thermal Radiation for People reaches into the southern portion of the project site. However, there are multiple intervening buildings between the diesel tanks and project site that would significantly attenuate thermal radiation before it reaches the project site. According to the HUD Barrier Design Guidance (24 CFR Part 51 Subpart C), “man-made or natural barriers may serve as abatement from thermal heat flux or blast overpressure effects that</p>

		can impact HUD-assisted projects and the people that will perform activities associated with the respective projects.” In addition, a letter from the Reno Fire Department was provided that specifies that Casazza Oil is well outside of the Code-required distance from the Nevada Cares Campus in regard to building location to tank locations. Therefore, the Casazza Oil tanks at 1575 E. Commercial Row would not pose a threat and potential thermal radiation impacts considered by the Fire Department to be mitigated by intervening structures and sufficient distance.
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is currently fully developed, in an area that is also fully developed and not currently used for farming. According to the United States Department of Agriculture Natural Resource Conservation Service Soil Survey, the site does not contain soil that meets the definition of prime or unique farmlands and is not of statewide or local significance. The site is zoned, and surrounding area is zoned as Mixed-Use Urban under the Reno Master Plan. The map attached shows an overview of the project and the surrounding area.</p> <p style="text-align: right;">Exhibit 2-I</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is located within Zone X, an area of minimal flood hazard, per FEMA panel 32031C3045G effective 3/16/2009.</p> <p style="text-align: right;">Exhibit 2-J</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A records search was conducted through the Nevada Cultural Resource Information System (NVCRIS) using a one-mile buffer to gather information pertaining to previous cultural resource inventories and previously recorded archaeological and/or architectural resources within and adjacent to the project area. Archival research did not result in the identification of any previously recorded archaeological resources within or adjacent to the area of potential effect (APE).</p> <p>A reconnaissance review of the APE was conducted on October 4, 2022. The APE has experienced a substantial amount of disturbance, largely through clearing and grading, the construction of buildings, the excavation of gravel, and the paving of roads and parking areas. Very little of the ground surface is presently visible for examination. Based on these conditions, a formal inventory would be of no value. In lieu of an inventory, the development and implementation of a monitoring and inadvertent discovery plan is recommended.</p> <p>Native American correspondence was initiated by NCE with a letter and attached maps to Washoe Tribe of</p>

		<p>Nevada and California (Washoe Tribe) and the Reno-Sparks Indian Colony (RSIC) on October 28, 2022. The letter requested response within 30 days of receipt of this letter if they would like to consult on this project and provide a designated lead contact person if they had not provided that information to us already. Inquiry letters were mailed to the tribes identified on October 28, 2022 on Washoe County letterhead. No tribes have responded to date to the letters.</p> <p>SHPO Concurrence was received January 31, 2023.</p> <p style="text-align: right;">Exhibit 2-K</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A noise study was performed by a qualified acoustical engineering firm, Saxelby Acoustics. Because the site is about 18 acres and contains a variety of buildings, this summary is broken out into the proposed uses.</p> <p><u>Safe Camp Area</u></p> <p>The safe camp is predicted to be exposed to noise levels of up to 70 dBA Ldn. This exceeds the HUD normally acceptable level of 65 dBA Ldn. The Safe Camp uses ModPod structures that provide about 20 dBA noise reduction. This means interior noise levels could be 50 dBA, which is above the HUD recommended 45 dBA level. To reduce noise levels at the safe camp area to 68-69 Ldn, two options are proposed:</p> <ol style="list-style-type: none"> 1. Extend the existing highway barrier along I-80 north of the project on the NDOT right-of-way, or 2. Construct a 12-foot-high noise barrier inside the camp property. <p>This Phase if the project is not federalized; therefore, mitigation is recommended but not required for the existing ModPods.</p> <p><u>Sprung Structure</u></p> <p>The noise study determined that the existing Sprung structure itself provided a 33.5 dBA reduction in noise levels. Highway noise levels up to 68 dBA are predicted outside the Sprung structure. HUD requires at least 25 dBA sound mitigation in buildings exposed to noise levels between 65-70 dBA Ldn. The Sprung Structure currently exceeds this requirement as constructed.</p> <p><u>Overflow Building</u></p> <p>Under future conditions, the Overflow building will be exposed to exterior noise levels of up to 63 dBA Ldn. This complies with the HUD noise level standard of less than 65 dBA Ldn exterior exposure. The HUD interior noise goal of 45 dBA Ldn would be met assuming a noise level reduction of 20 dBA from the building itself. No</p>

		<p>additional noise control measures are required for this building.</p> <p><u>Bridge Housing</u></p> <p>The Bridge Housing building is predicted to be exposed to noise levels of up to 71 dBA Ldn at second floor receivers. These noise levels exceed the HUD exterior noise level standard of 65 dBA Ldn. Therefore, additional interior noise control measures of 30 dBA would be required.</p> <p style="text-align: right;">Exhibit 2-L</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The sole source aquifer (SSA) authority would apply to the project since there will be new construction; however, according to the Environmental Protection Agency (EPA) SSA interactive online map, the project location does not lie above a sole source aquifer.</p> <p style="text-align: right;">Exhibit 2-M</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the National Wetlands Inventory (NWI) interactive online map, the project is not located on a wetland identified by the U.S. Fish and Wildlife Services. There are wetlands associated with the Truckee River approximately 0.24 miles south of the site. Between the site and the wetlands, the area is fully developed; therefore, the project would have no effect on the wetlands surrounding the Truckee River. In addition, no wetlands were observed during the biological field survey.</p> <p style="text-align: right;">Exhibit 2-N</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project would be constructed on a heavily developed parcel surrounded by commercial uses. There are no wild and scenic river systems, nor Nationwide Rivers within the vicinity of the project.</p> <p style="text-align: right;">Exhibit 2-O</p>
ENVIRONMENTAL JUSTICE		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The US EPA online assessment tool, EJ Screen, was used to develop findings about the project site.</p> <p>Since the site is about 18 acres, a model run was completed by outlining the boundaries of the project site (one of the tools in EJScreen). Then, a second run was completed by computing risk scores based on a one-half mile radius from the approximate center of the property.</p> <p>As an example of what this means, PM_{2.5} is higher on-site than 81% of other inhabited parts of the state. The data generally shows that the various factors do not change</p>

		<p>very much between being on-site or other locations within one-half mile. The main cause for this is the air pollution created by vehicles on two major freeways at the boundary of the project. In addition, other factors leading to these high percentiles are the older buildings that may contain lead-based paint and proximity to underground storage tanks or hazardous waste. The data shows the main difference between the two screens is the number of children under 5 who are exposed to higher pollution. The number of young children increases by about one-third over the project site alone when the screen is run out to one-half mile. This likely results from the children living in housing scattered around the area, especially north of Interstate 80.</p> <p>Traffic data for the main highways next to the site was obtained from the Nevada Department of Transportation Traffic Information Systems (TRINA). It is likely that many of these vehicles are double counted as they transition from one highway to the other. The traffic data do not tell us what portion of the trips are local, nor how many are heavy-duty trucks and buses. Regardless of these limitations, the project site is in area with a very high level of traffic, rivaling that of many major American cities.</p> <p>The high metrics for low-income and unemployment rate are self-explanatory – the project is a homeless assistance facility. Most of the people served by this project are adult homeless people, many of which are un-or-under employed. The term ‘demographic index’ is defined as follows, “The demographic index in EJScreen is a combination of percent low-income and percent minority, the two socioeconomic factors that were explicitly named in Executive Order 12898 on Environmental Justice. For each Census block group, these two numbers are simply averaged together. The formula is as follows: demographic index = (% people of color + % low-income) / 2.” (US EPA 2022b). The demographic index increases by about 20% in the one-half mile screen compared to the project site, indicating that the project site would not disproportionately impact low income or minority populations compared to other areas nearby.</p> <p style="text-align: right;">Exhibit 2-P, Reference 10, 11, and 17</p>
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or

consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>The project is zoned as Mixed-Use Urban under the Reno Master Plan. The project proposes to construct a supportive housing center on developed parcels. The use is consistent with the City’s requirements for the Mixed-Use Urban, as well as the scale and design of development in the area.</p> <p style="text-align: right;">Refs 3,4</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>The topography is relatively flat throughout the site. The project construction must comply with City of Reno’s erosion and sediment control ordinance and storm water management and discharge control ordinance per the City of Reno’s Zoning Ordinance.</p> <p style="text-align: right;">Ref 2</p>
Hazards and Nuisances including Site Safety and Noise	3	<p>As discussed above, to eliminate the potential for human exposure to unknown soil constituents in the imported fill at the project site, any planned gardening shall occur in raised beds or greenhouses without direct access to site soils. A soil vapor test will be conducted, and mitigation will be identified and provided if needed and feasible for the existing ModPod units. A RAP has been prepared to ensure appropriate oversight and mitigation if removal of the tanks during demolition reveals unanticipated soil contamination.</p> <p>The project would also adhere to the City’s Noise Ordinance during construction and would not increase ambient noise levels significantly during operation.</p> <p style="text-align: right;">Exhibit 2-F, 2-H, 2-L, and Ref 2</p>
Energy Consumption	2	<p>Nevada (NV) Energy will provide the electricity to the buildings on the project site. NV Energy has served the Reno-Sparks area of Northern Nevada for more than 150 years. Energy efficiency is a sustainable development goal in the Reno Master Plan. It specifically says that for new development “where possible, incorporate energy saving and energy efficient building designs, appliances, systems, and other building components that help the</p>

	<p>improve energy efficiency and lower energy consumption.” The project would work in agreement with this goal and efficiency LED street and area lights will be used throughout, and secure bike parking will be provided at numerous locations.</p> <p>The population growth and incumbent increase in energy consumption is fully consistent with growth projections in the Reno Master Plan. No new offsite facilities will be required as a result of the energy consumption onsite. The project can be presumed to have no significant impact.</p> <p style="text-align: right;">Ref 3 and 16</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	Temporary construction jobs will be generated during construction of the project, as well as permanent full-time managers, security guards, nurses, and childcare positions. Overall, there will be about 175 people employed at buildout. Ref 1
Demographic Character Changes, Displacement	2	The project would provide up to 1,100 temporary beds, 50 units for low-income families and individuals, and services for the unhoused. These uses are consistent with the land uses and demographics of the neighborhood. The site is vacant; therefore, no families, individuals or businesses will be displaced during construction. Ref 1

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The project would provide up to 1,100 beds that would serve homeless individuals, and 50 units for low-income families and individuals. The Washoe County School District serves the project site: the site is served by Booth Elementary School (K-5), Vaughn Middle School (6-8), and Wooster High School (9-12). University of Nevada Reno is located within four miles via transit. Cultural facilities are available throughout the city. Ref 3 and 5
Commercial Facilities	2	The project is surrounded by commercial businesses. Adjacent to the project site is a motel and a tire shop. East of the project site are more motels, dealerships, a Mexican restaurant, bars, and a casino. More commercial facilities are located throughout the area, with accessible public transit to further services. Ref 1

Health Care and Social Services	1	<p><u>Health Care</u> Renown Regional Medical Center is located 1.3 miles south and is a full-service medical center. The project would include medical staff onsite for residents.</p> <p><u>Social Services</u> The project would serve a significant need for homeless housing in Reno. This housing is likely to reduce individuals need to rely on other social services in the area, also reducing the burden on existing social service providers. The project would therefore have a beneficial impact on social services.</p> <p style="text-align: right;">Ref 1</p>
Solid Waste Disposal / Recycling	2	<p>The project construction would generate construction waste and removal of debris, and the residential and commercial uses would generate mixed waste managed by the City of Reno. Construction waste would be disposed at the Transfer Station located within the City of Reno, which is the primary municipal solid waste disposal facility and then transferred to the Lockwood Regional Landfill, located in Storey County, Nevada. Residential waste would be transferred by franchised haulers authorized by the Waste Management District to collect commercial garbage and commingled recycling within the City of Reno.</p> <p style="text-align: right;">Refs 3 and 8</p>
Wastewater / Sanitary Sewers	2	<p>Wastewater is conveyed through the City of Reno sanitary sewer system. The City of Reno Environmental Engineering section operates the Reno/Stead Water Reclamation Facility (RSWRF) and collaborates with the City of Sparks on operating the Truckee Meadows Water Reclamation Facility (TMWRF). The TMWRF provides treatment of the City’s wastewater in the Central Truckee Meadows (the area containing the project). In 2007, an expansion project was completed to the TMWRF and the capacity was increased to 44 millions of gallons per day (MGD). The current flows into the facility average approximately 30 MGD, therefore there is sufficient wastewater capacity to meet the project needs.</p> <p style="text-align: right;">Ref 14 and 15</p>
Water Supply	2	<p>Water would be provided to the project site by the Truckee Meadows Water Authority. The City has sufficient water rights and supply to meet the project, which is consistent with the Master Plan.</p> <p style="text-align: right;">Ref 18</p>
Public Safety - Police, Fire and Emergency Medical	2	<p><u>Police:</u> The Reno Police Department provides police protection services to the city. The police department is located approximately 1.3 miles southeast of the project site.</p> <p><u>Fire:</u> The City of Reno Fire Department, the Washoe County Fire Department, and Nevada State Fire Marshal provide fire protection in</p>

		<p>Reno and the unincorporated areas in and immediately surrounding the city. The station closest to the project site is Fire Station 1, located approximately 1 mile west of the project site.</p> <p><u>Emergency Medical Services:</u></p> <p>All City of Reno Fire Engine and Truck Companies are utilized as EMS first responders and staffed with Firefighter-EMTs and/or Firefighter-Paramedics. The project is consistent with the Master Plan and would not add significantly to service already established nor anticipated future service levels.</p> <p style="text-align: right;">Ref 3</p>
Parks, Open Space and Recreation	2	<p>Sage Street Park is located approximately 1.1 miles north from the project site, and Pinion Park is located approximately 1.4 miles southeast of the site. These parks would serve as local parks and open space for the project residents. As well, the project itself would provide open space and recreation. Within the project site, landscaped grounds include an outdoor area with benches and walking path in the center of Phase 2, 3 and 4.</p> <p style="text-align: right;">Ref 1</p>
Transportation and Accessibility	2	<p>The Regional Transportation Commission (RTC) of Washoe County provides service to the project area via Bus Route 11, adjacent to the project area to the south. All routes provide access to major medical centers and other commercial facilities in the area. There are bus stops on either side of East 4th Street and Threlkel Street for Bus Route 11, which runs in 30-minute or 1-hour intervals depending on the time of the day.</p> <p style="text-align: right;">Ref 6</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	<p>The site is a flat and is in various stages of construction and development. No unique natural or water resource features are on the project site.</p> <p style="text-align: right;">Exhibit 2-G, 2-N, 2-O</p>
Vegetation, Wildlife	2	<p>The site is a flat and is in various stages of construction and development. No unique vegetation or wildlife are on the project site. However, existing trees on and adjacent to the periphery of the site could provide nesting habitat for birds protected under the Migratory Bird Treaty Act. The County must incorporate the required mitigation measures into the building plans.</p> <p style="text-align: right;">Exhibit 2-G</p>
Other Factors: Sustainability,	2	<p>The City of Reno has a strong commitment to sustainability and innovative solutions to deal with climate change. The 2019-2025 Sustainability and Climate Action Plan demonstrates Reno's commitment to reduce climate pollution through the development,</p>

<p>Climate Change, and Energy Efficiency</p>	<p>adoption, and implementation of measurable actions. The Plan’s goal is to reduce greenhouse gas emissions by 28% from 2008 levels by 2025 and by 40% by 2030. Reno has identified actions, staff and funding needs, and potential direct savings. Reno has adopted a monitoring and reporting program that will document progress on a three-year cycle.</p> <p>The project provides homeless housing and has been reviewed for consistency with the goals, policies, and targets of the 2019-2025 Sustainability and Climate Action Plan, the Reno Master Plan, and the Washoe County Master Plan. If approved, this project will advance the Reno Master Plan Priority Initiative A - Develop a targeted affordable and workforce housing strategy including supporting programs that aid homeless and near homeless populations.</p> <p style="text-align: right;">Ref 3 and 12</p> <p>Climate change is a crucial criterion to consider when planning for future conditions. Climate change is already impacting Nevada through warmer (and drier) temperatures, tree loss due to drought and heat stress, reduced snowpack, and more destructive wildfires. The biggest impact may be to water resources, which are increasingly at risk. According to the City of Reno, “Reno is growing hotter more quickly than any city in the United States. Our average annual temperature rose more than 7 degrees Fahrenheit over the past 50 years. Last summer, Reno experienced the hottest summer on record and the highest number of 100 plus degree Fahrenheit days.”</p> <p>In the near and long-term modeling for water supply, the modeling effort demonstrates that TMWA has sufficient water resources to meet the growing demand in the region under almost all climate conditions modeled. No water shortages were found under any of the climate scenarios during the 20-year planning horizon. To account for drought risk beyond the planning horizon, landscaping on site will be designed with drought-resistant plants and trees.</p> <p style="text-align: right;">Ref 13</p> <p>The project will incorporate various environmental mitigations. High efficiency LED street and area lights will be used throughout, waste bins and recycling bins are on site for residents, native and drought-resistant trees will be planted, and secure bike parking will be provided at numerous locations. These elements improve energy efficiency and reduce carbon emissions. As a homeless housing project with energy-efficient building design in an area served by transit, the project would be consistent with adopted City goals and policies for energy efficiency and sustainability.</p> <p style="text-align: right;">Refs 12, 18</p>
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Additional Studies Performed:

- NCE. 2022. *Nevada Cares Campus – Governor’s Bowl - Phase 1 Environmental Site Assessment.*
- NCE. 2022. *Nevada Cares Campus, Phases 3 and 4 Architectural Inventory Report.*
- NCE. 2022. *Nevada Cares Campus, Phases 3 and 4 Archaeological Monitoring Plan.*

- NCE. 2022. *Nevada Cares Campus Project - Vegetation and Wildlife Assessment*.
- Saxelby Acoustics. 2022. *Cares Campus HUD Environmental Noise Assessment*.

Field Inspection (Date and completed by):

1. Field Observation conducted by Dylan Karlowicz, NCE. October 4, 2022.
2. Field Observation conducted by Stewart Rathbone, NCE. October 4 and 25, 2022.
3. Field Observation conducted by Molly Laitinen, NCE. October 4, 2022.
4. Field Observation conducted by Matthew Kinney, NCE, November 10, 2022.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

1. Unless otherwise noted, assessments based upon expertise and experience of Gail M. Ervin, Ph.D., NCE.
2. City of Reno. 2022. Reno Municipal Code. Accessible from: [Land Development Code | Reno, NV | Municode Library](#)
3. City of Reno. 2021. "Reno Master Plan." Accessible from: [Development Services - Master Plan](#)
4. Washoe County. 2010. "Washoe County Master Plan". Accessible from: [Master Plan \(washoecounty.gov\)](#)
5. Washoe County School District. 2022. WCSD Data Gallery. Accessible from: [WCSD School Zones \(arcgis.com\)](#)
6. Regional Transportation Commission of Washoe County. nd. Route 11 transit Stops and Schedule. Accessible from: [Route 11: Fourth/Prater - RTC Washoe](#)
7. McGinley & Associates. Phase 1 Environmental Site Assessment, 1775 East 4th Street, APNs 008-211-13 and 008-211-46, City or Reno, Washoe County Nevada. October 12, 2020.
8. City of Reno. 2022. Solid Waste & Recycling. Accessible from: [Solid Waste & Recycling | City of Reno](#).
9. City of Reno. 2007. TMSA/FSA Water, Wastewater, and Flood Management Facility Plan. Accessible from: [TMSA/FSA Water, Wastewater and Flood Management Plan | City of Reno](#)
10. United States Environmental Protection Agency. 2022. EJScreen. Accessible from <https://ejscreen.epa.gov/mapper/> Accessed July 27, 2022.
11. Nevada DOT. 2022. Traffic Records Information Access (TRINA). Accessible from <https://www.dot.nv.gov/doing-business/about-ndot/ndot-divisions/planning/traffic-information> Accessed November 3, 2022
12. City of Reno. n.d. Reno Resilience. Accessible from <https://www.reno.gov/community/sustainability> Accessed November 16, 2022
13. This is Reno. 2019. City Passes Bold Sustainability, Climate Action Plan. Accessible from <https://thisisreno.com/2019/08/city-passes-bold-sustainability-climate-action-plan/>
14. City of Reno. n.d. Wastewater Infrastructure/Plants and Environmental Services. Accessible from [Wastewater Infrastructure/Plants & Environmental Services | City of Reno](#) Accessed November 16, 2022
15. City of Sparks. n.d. Water Reclamation Facility. Accessible from [Sparks, NV \(cityofsparks.us\)](#). Accessed November 16, 2022
16. Nevada Energy. n.d. Company History. Accessible from <https://www.nvenergy.com/about-nvenergy/our-company/history>. Accessed November 16, 2022
17. United States Environmental Protection Agency (EPA). 2022b. EJScreen Map Descriptions. Accessible from <https://www.epa.gov/ejscreen/ejscreen-map-descriptions>. Accessed July 27, 2022.
18. Truckee Meadows Water Authority. n.d. 2020-2040 Water Resource Plan. Accessible from [TMWA-WRP-2020-Final.pdf](#)

List of Permits Obtained:

A building permit from the City of Reno would be required.

Public Outreach [24 CFR 50.23 & 58.43]:

There have been numerous public hearings on elements of the project, including a Board of Supervisors hearing on March 15, 2022 and another on May 10, 2022. A Finding of No Significant Impact and a Notice of Intent to Request Release of Funds will be published in a paper of general circulation 15 days before the RROF will be submitted to HUD to allow public comment on the project. The public will have 15 days to provide comment to HUD for anyone who wishes to challenge the bases for the FONSI determination.

Cumulative Impact Analysis [24 CFR 58.32]:

The project is designed to help unhoused individuals and families receive mental health support and alternative shelter options. The project will eventually provide up to 1,100 beds and services for the unhoused. The project is consistent with City's zoning and master plan policies. The project's expected construction and operation CO emissions are below the 100 tons/year de minimis threshold in federal law for CO maintenance areas. The project is within walking distance of the bus service and bike parking will be provided. Operational impacts related to traffic and air quality are anticipated to be cumulatively less than significant. There is no habitat for special status species present within or adjacent to the project area thus the project will not result in a cumulative loss of biological resources. There are no historic resources on the site, and measures to protect unanticipated discovery of tribal cultural resources would ensure no cumulative loss of subsurface cultural resources. The project would incorporate measures or may conduct an interior noise control report demonstrating that the proposed building construction would achieve the HUD interior noise reduction requirement of 30 dBA, and minor traffic increases would not result in a cumulatively significant increase in ambient noise levels. Residents and construction workers will be protected from exposure to potential soil contaminants. The project does not displace existing uses and provides homeless housing within the City of Reno. Therefore, the project would result in no cumulatively significant effects on the human or natural environment.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Alternative 1: Purchasing land and building a new facility that meets basic hygiene and welfare needs. This alternative was explored; however, zoning limitations severely reduced the options of available parcels. No other parcels for sale of the appropriate size were available in the zone that allows for a homeless shelter. In addition, the cost of building an emergency shelter of the size needed to meet the current demand would surpass the cost of building the hygiene and welfare needs at the current emergency shelter.

Alternative 2: Purchasing a motel or multiple motels to provide emergency shelter

No properties of adequate size were for sale. One property was identified, but the price was extremely high. Exploratory conversations with current motel owners indicated a listing price of \$4-5 million for purchase alone. In addition, the cost of renovation supplies, labor, and maintenance were significantly higher than the proposed capital expenditures.

Several motel/hotel buildings would be needed to meet the needs of the current unsheltered population. Additional locations would add an additional staffing burden and dramatically increase operation costs.

Alternative 3: Purchasing separate parcel for affordable housing development.

Land costs make this option much more expensive than the proposed capital expenditure.

No Action Alternative [24 CFR 58.40(e)]:

The No Action Alternative would leave the project parcels vacant with no funding for safe housing and social services for Washoe County’s unhoused population. The property would remain underutilized, with limited homeless services in the Sprung Structure and ModPods, and the County would have limited ability to meet a critical need.

The County has determined the project is consistent with all City land use plans, policies, and regulations for the project site. Not building on this site could result in more facilities constructed further away from centralized services and transit to meet the demand for homelessness housing, contributing to urban sprawl, regional traffic congestion and regional air quality problems.

Summary of Findings and Conclusions:

The environmental assessment has determined that the construction of the Nevada Cares Campus project, as mitigated, would have no adverse effect on the human or physical environment. The project would eventually provide up to 1,100 beds and services for the unhoused. The activities are consistent with adopted plans and policies, and the new development would connect to existing municipal services that the City and County have determined are adequate to serve the housing development. The surrounding vicinity has transit access to a full range of commercial, medical, emergency, social and recreational services to serve the future residents. Measures are in place to address unanticipated discoveries of tribal cultural resources or human remains during ground moving activities, to limit impacts to vegetation and wildlife, to follow City of Reno Noise Ordinance, to mitigate noise impacts or conduct an interior noise control report, and to eliminate the potential for human exposure to unknown soil constituents in the imported fill or under the abandoned tanks to be removed. The project will therefore have a beneficial effect on the quality of the human environment and no adverse effect on the natural environment.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Historic Preservation TCR-1a: Procedures for The Inadvertent Discovery of Cultural Resources	The Construction Manager, in coordination with the County, will implement interim treatment measures (e.g., use of tarps, flagging, fencing), as needed, in consultation with the archaeological monitor (and the tribal monitor should one be involved) to protect the discovery from any immediate risks from weather, looting, vandalism, or other exposure to damages, assuming measures can be installed without adverse effects. As soon as practicable, ensure that a professional archaeologist (meeting SOI qualifications) specified above,

	<p>confirms the discovery, confirms the need for the work stoppage, and assesses the nature of the discovery (i.e., its content, condition, location, and circumstances of its discovery). If at any time the County determines the materials are non-cultural, the County will rescind the SWO and issue a clearance to proceed with the Undertaking.</p> <p>The County will notify the SHPO within three calendar days of the discovery unless the County determines that the materials are non-cultural (see above). Communication from the County will be made through the primary contact identified on the POC List maintained by the County. Electronic mail (email) or phone calls will serve as the primary distribution method for initial notifications. The County will follow up with paper copies for all communication from the County to the SHPO.</p> <p>The County, in consultation with a professional archaeologist and the SHPO, will have 10 calendar days following notification to determine the National Register eligibility of the discovery or determine the need for additional testing. The County may assume the discovery to be National Register eligible for the purposes of Section 106 pursuant to 36 CFR 800.13(c) and proceed to avoidance or resolution of effects. If the County determines testing is needed to make a determination of National Register eligibility and/or determine site boundaries, the County will consult first with the SHPO before proceeding with the testing. If the County determines the materials are not eligible for listing on the National Register, the County will provide information to the SHPO. The SHPO will have 10 calendar days to respond. If the SHPO concurs, the County will ensure the site is recorded by a professional archaeologist and archaeological resource forms submitted to the SHPO in a routine manner. On receipt of SHPO concurrence, the County will rescind the SWO and allow the Undertaking to proceed. If the County determines or assumes the discovery is National Register eligible, an assessment of adverse effects will be made with consideration of methods for avoiding, minimizing, and/or mitigating those effects. If the County determines the resource cannot be avoided, the County will have 10 calendar days to assess adverse effects and propose measures to minimize or mitigate those effects. The County will consult with a professional archaeologist and appropriate tribal representatives in developing the measures.</p> <p>Measures will be presented in a Historic Properties Treatment Plan (HPTP), with measures to minimize and mitigate adverse effects, the manner in which these measures will be carried out, and a schedule for their implementation. The HPTP will specify requirements for reporting, analysis, and disposition of any archaeological material collected, as applicable. The County will submit the HPTP to the SHPO.</p>
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	<p>The SHPO will have 10 calendar days to consult on the measures at which time the County will make a decision and proceed with implementing measures. The County shall ensure that all measures identified in the HPTP are implemented. Work may resume in the area once the fieldwork phase of the implementing measures has been completed and the County has authorized the removal of any protective measures. The County will notify the Construction Manager that they proceed with the Undertaking-related activities in the discovery area.</p>
<p>Historic Preservation TCR-1b: Procedures for The Inadvertent Discovery of Human Remains</p>	<p>If suspected human remains, funerary objects, sacred objects, or items of cultural patrimony are encountered while engaged in construction activities, all work within 100 feet of the find must stop. All appropriate measures will be taken to ensure the site is protected. The Construction Manager shall contact the proper local authorities, including the archaeological monitor (and the tribal monitor should one be involved), the local Sheriff's Office, and the County Coroner. The coroner and law enforcement agency with jurisdiction will evaluate the find to determine whether it is a crime scene or a burial.</p> <p>If human remains are determined to be associated with an archaeological site (burial), the SHPO will be notified. The SHPO will work with appropriate tribes to determine measures to take. Work may resume in the area once the County has authorized the Construction Manager to continue work and the archaeological monitor has removed any protective measures. The following procedures will be used to ensure compliance with NAGPRA.</p> <p>Any project personnel responsible for the initial discovery of a previously unreported, unanticipated, and unidentified human remains, graves, associated funerary items, unassociated funerary items, sacred objects, or objects of cultural patrimony must initiate a SWO. All ground-disturbing activities at the site of the discovery and within 100 feet of the discovery will stop immediately. All personnel, except the archaeological monitor (and the tribal monitor should one be involved), if present, should retreat outside the exclusion zone and leave heavy equipment safely in place until they receive further directions from the Construction Manager. The Construction Manager will immediately notify the County POC by telephone, with follow-on written confirmation. The Construction Manager, in coordination with the County, will implement interim measures (e.g., use of tarps, flagging, fencing), as needed, and in consultation with archaeological monitor (and the tribal monitor should one be involved), if present, to make a reasonable effort to protect the discovery from any immediate risks from weather, looting, vandalism, or other exposure to</p>

	<p>damages assuming measures can be installed without adverse effects.</p> <p>If the discovery contains human remains, the County will notify the County Coroner within 48 hours, as required by NRS 383.170. If the County Coroner determines the human remains are not Native American, then the County will consult about next steps in compliance with applicable law (if at any time the County determines that the materials are not related to Native American human remains, graves, associated funerary items, unassociated funerary items, sacred objects, or objects of cultural patrimony, the County will revert to other relevant sections of this plan). If the County Coroner determines the human remains are Native American, then the County will continue to follow the procedures herein.</p> <p>The County will notify the SHPO, and others, as needed, within three working days of the discovery. Communication from the County will be made through the primary POC identified on the POC List maintained by the County (see Appendix B). Phone calls will serve as the primary distribution method for initial notifications for tribes that are likely culturally affiliated with the discovery, the area of discovery, or otherwise may have a cultural relationship with the discovery (43 CFR 10.4(d)(1)(iii)). The County will follow up with written confirmation for all of such communications. Notifications must include pertinent information as to the kinds of human remains, funerary objects, sacred objects, or objects of cultural patrimony discovered inadvertently, their condition, and the circumstances of their inadvertent discovery.</p> <p>The County will follow NAGPRA procedures (43 CFR Part 10) for initiating and conducting consultations to discuss treatment and disposition of remains. The County will prepare, approve, sign, and implement a written plan of action to document the agreed upon procedures for removal, disposition, and control of any NAGPRA-related cultural items, pursuant to 43 CFR 10.5(e). Activities in the area of discovery may resume 30 days after certification of notification is received, or sooner, if a signed binding agreement is reached, pursuant to 43 CFR 10.4(d)(2). Before the Undertaking can resume, the County must have implemented the NAGPRA process properly and confirmed with the County legal counsel that the County is in a legal position to proceed with the project in the area of discovery. The County will ensure that all necessary notifications to the Consulting Parties and SHPO have been completed. The County will provide clearance to the Construction Manager to proceed with the Undertaking and ensure that any avoidance</p>
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	measures and/or follow-on monitoring requirements are fulfilled.
<p>Vegetation and Wildlife Migratory Bird Treaty Act of 1918 (MBTA), codified at 16 U.S.C. §§ 703–712</p>	<p>If vegetation removal or ground disturbance near potential migratory bird or SSS nesting habitat (e.g., native and ornamental trees, bushes, shrubs) is proposed during the nesting season (typically February 1 through September 1), a survey for active bird nests should be conducted by a qualified biologist no more than 10 days prior to initiation of these activities. If nests are identified, then avoidance, minimization, or other mitigation measures must be implemented.</p> <p>Avoidance and minimization measures recommended for the project include the following:</p> <ul style="list-style-type: none"> • The USFWS and NDOW recommend completing all project activities that could result in nesting migratory bird and raptor take, such as tree, shrub, and other vegetation removal, outside the maximum migratory bird and raptor nesting season. September through January is a suitable timeframe for completing vegetation removal to minimize the potential to impact nesting birds and raptors. • If project work must occur during the nesting season (February through August), project proponents should utilize a qualified biologist to survey nesting birds and raptors no more than 10 days prior to the beginning of tree removal activities. A copy of the survey shall be submitted to the project proponent prior to the start of construction activities. • If nesting birds or raptors are detected within or near the project area during the survey, consultation with NDOW and the USFWS is recommended to establish acceptable avoidance or minimization measures to avoid impacts. Avoidance measures could include the establishment of a suitable activity-free buffer around active nest sites. The size of the buffer, duration of buffer, and acceptable activities will be established through consultation with the agencies. The avoidance or minimization plan shall be submitted to the project proponent for review and approval prior to the start of construction activities. These measures will ensure that no nesting birds or roosting bats are impacted by construction activities.

<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Washoe County shall ensure the project complies with the City of Reno Noise Ordinance Section 18.04.1408, which specifies the following requirements (taken directly from City code):</p> <p>(a) Noise at Residential Property Lines</p> <p>(1) Measurement of noise shall be made at the residential property line with a sound level meter and octave band analyzer meeting the standards prescribed by the American Standards Association.</p> <p>(2) Permissible Noise Level</p> <p>a. Nighttime Noise Level Noise levels shall not exceed 49 db leq or 49 db for a single event occurring on a re-occurring basis at a residentially zoned property line between 10:00 p.m. and 7:00 a.m.</p> <p>b. Daytime Noise Level Noise levels shall not exceed 65 db leq or 65 db for a single event on a reoccurring basis at a residentially zoned property line.</p> <p>1.Noise associated with temporary construction activity is exempt from the standards from 6:00 a.m. to 7:00 p.m.</p> <p>2.Airport airplane operations are exempt from these standards.</p> <p>(b) Exclusions for Existing Higher Ambient Noise Levels where existing ambient noise levels already exceed the standards of this article as of the effective date of this Title, the subject source may not increase existing levels.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Incorporate the following into the design for the new residential building portions of the Bridge Housing:</p> <ol style="list-style-type: none"> 1. Building facades shall use stucco with sheathing or cement fiber board with sheathing. 2. STC 33 minimum-rated glazing shall be used. 3. Interior gypsum wallboards shall be 5/8" hung on resilient channels. 4. Interior gypsum ceiling shall be 5/8". 5. Wherever possible, mechanical ventilation penetrations for exhaust fans should not face toward I-80 or I-580. Where feasible, these vents should be routed towards the opposite side of the building to minimize sound intrusion to sensitive areas of the buildings. Where vents must face toward I-80 or I-580, the duct work should be increased in length and make as many "S" turns as feasible prior to exiting the dwelling. This separates the openings between the noise source and the living space with a long

	<p>circuitous route. Each time the sound turns a corner, it is reduced slightly. Flexible duct work is preferred ducting for this noise mitigation. Where the vent exits the building, a spring-loaded flap with a gasket should be installed to reduce sound entering the duct work when the vent is not in use.</p> <ol style="list-style-type: none"> 6. Mechanical ventilation shall be provided to allow occupants to keep doors and windows closed for acoustic isolation. 7. No packaged terminal air conditioners shall be used. <p>In lieu of these measures, an interior noise control report may be prepared by a qualified acoustic engineer demonstrating that the proposed building construction would achieve the HUD interior noise reduction requirement of 30 dBA.</p>
<p>Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>The County shall conduct a Phase II investigation to evaluate undocumented fill on the northern portion of the project area to evaluate soil vapor beneath the site for the presence of COPCs.</p> <p>For the soil stockpile, the County shall coordinate and verify disposal of the approximate 2,000-yard soil stockpile in the northwestern portion of the site with a predetermined disposal facility.</p>
<p>Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>To eliminate the potential for human exposure to unknown soil constituents in the imported fill at the project site, any planned gardening shall occur in raised beds or greenhouses without direct access to site soils.</p>



U.S. Department of Housing and Urban Development

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

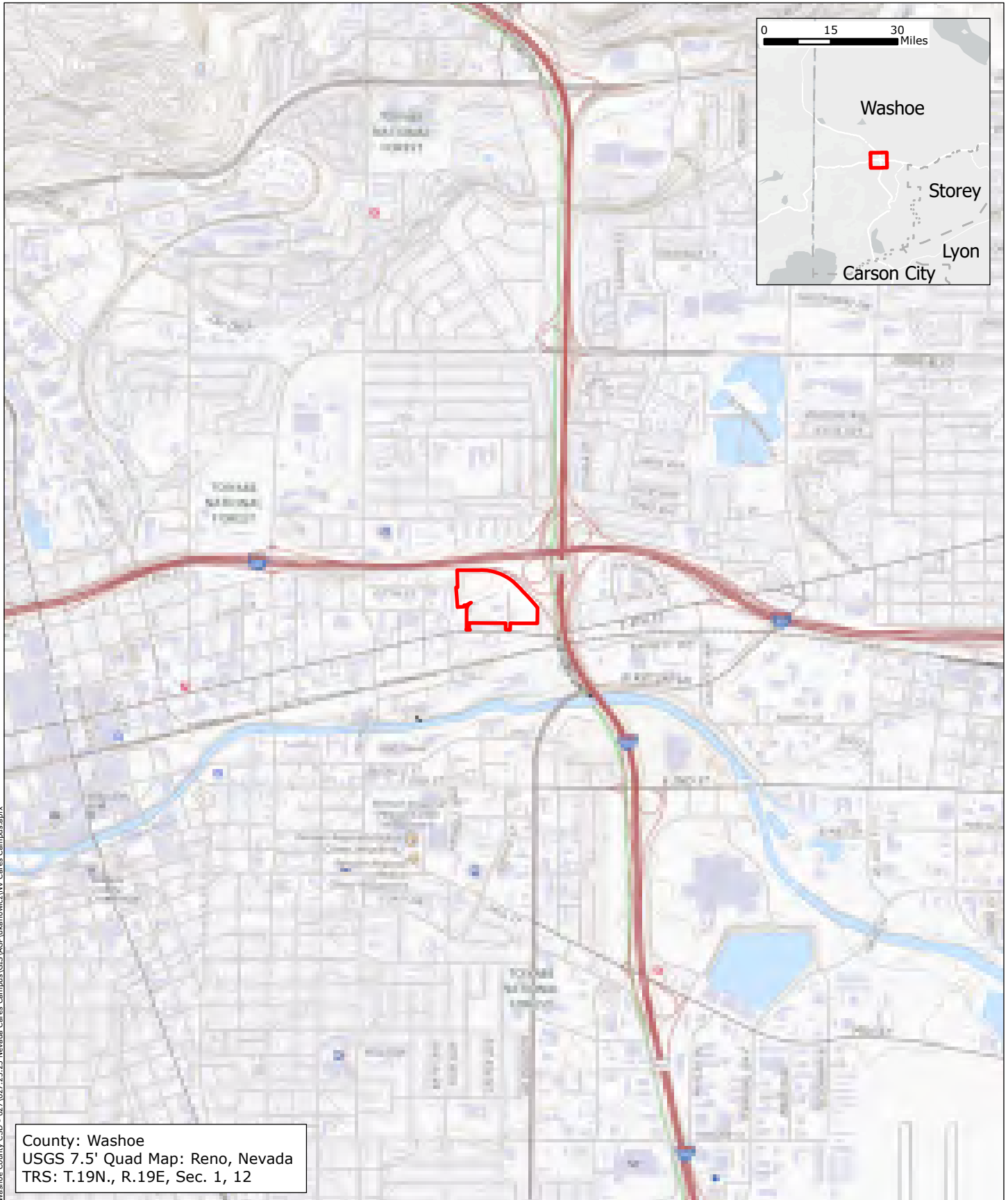
Preparer Signature: Gail M. Ervin Date: 2/14/23

Name/Title/Organization: Gail M. Ervin, Principal, NCE

Certifying Officer Signature: _____ Date: _____

Name/Title: _____

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



County: Washoe
 USGS 7.5' Quad Map: Reno, Nevada
 TRS: T.19N., R.19E, Sec. 1, 12

 Project Area



Nevada Cares Campus Project
 Reno, Nevada
 Project Area Location Map

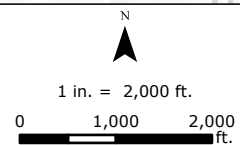


FIGURE
1

SOURCE
 ESRI USGS Topographic Basemap

JOB NUMBER
 627.23.25

DRAWN
 dkarlowicz


DATE
 10/5/2022

REVISED
 -

APPROVED
 drios



Document Path: P:\Active Projects\Washoe County_CSD - 627\627.23.25 Nevada Cares Campus\GIS\ASPP\dkarlowicz\NV_Cares_Campus.aprx

 Project Area



Nevada Cares Campus Project
Reno, Nevada
Project Detail Map

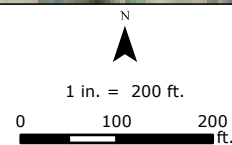


FIGURE
2

SOURCE
ESRI Aerial Basemap, Washoe Co

JOB NUMBER
627.23.25

DRAWN
dkarlowicz

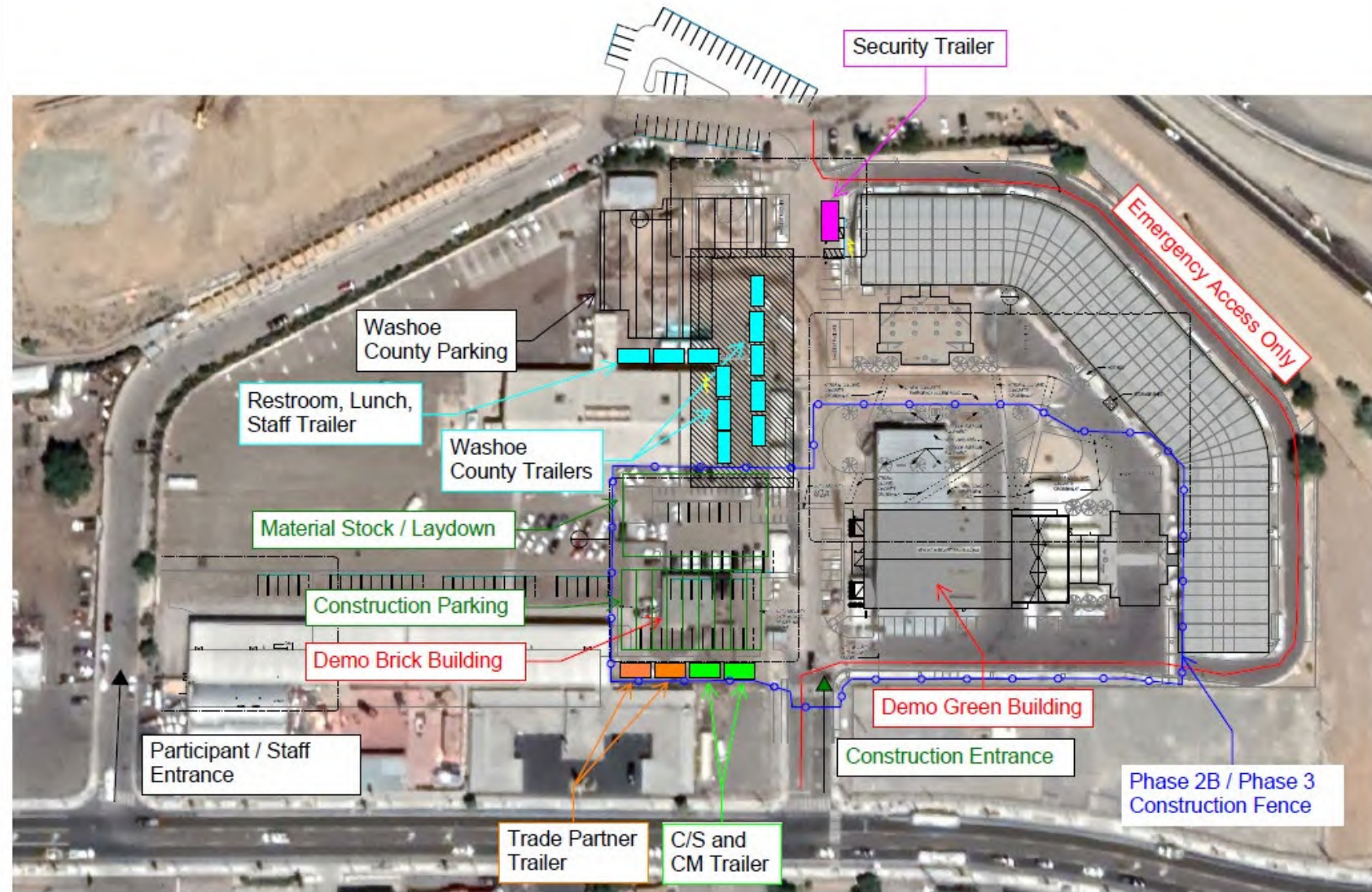
DATE
10/5/2022

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Cares Campus – Temp Site Layout #2



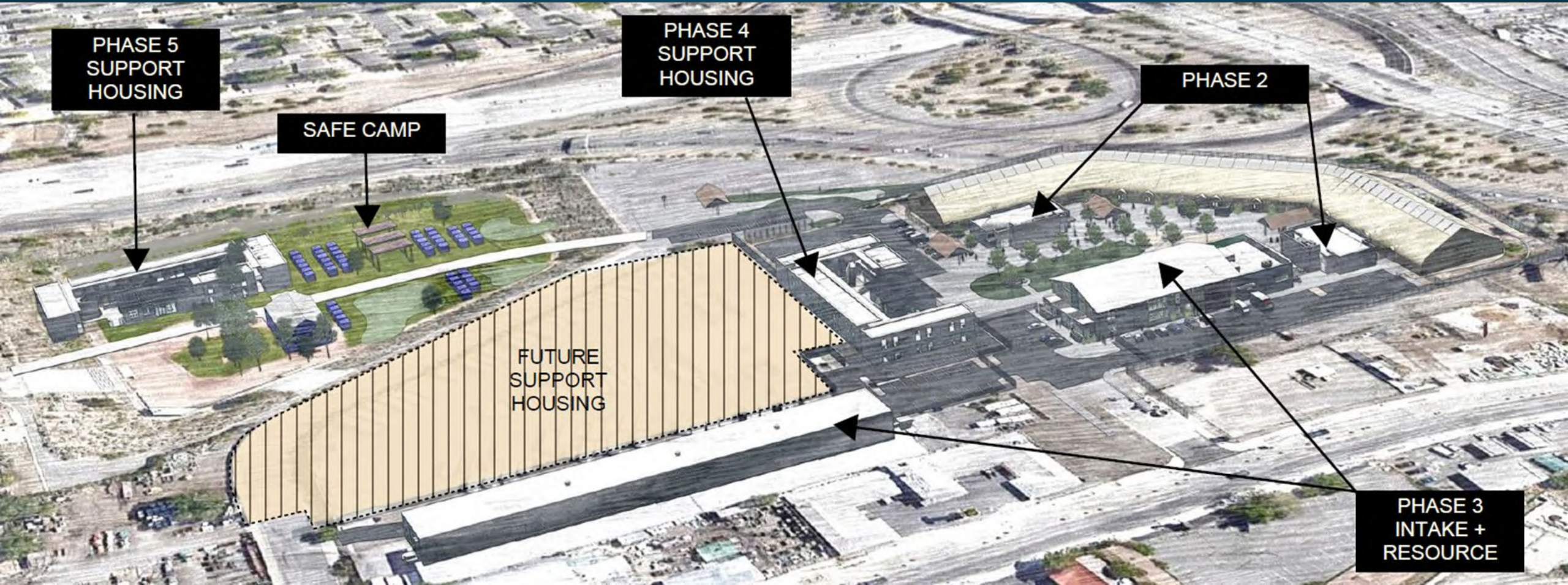


Nevada Cares Campus & Housing and Homeless Services

Oct 1, 2022



Cares Campus – Construction Update





Cares Campus

The Campus will provide a variety of shelter options to meet different needs and create community. Although each unique, all shelter options are based on a housing first, low barrier model and focus on meeting clients where they are at.

Phase I and Phase II



Initial intake in the congregate living bunk room.

Phase II



Semiprivate living with cubbies.

Phase II



Semiprivate living in a ModPod at Safe Camp.

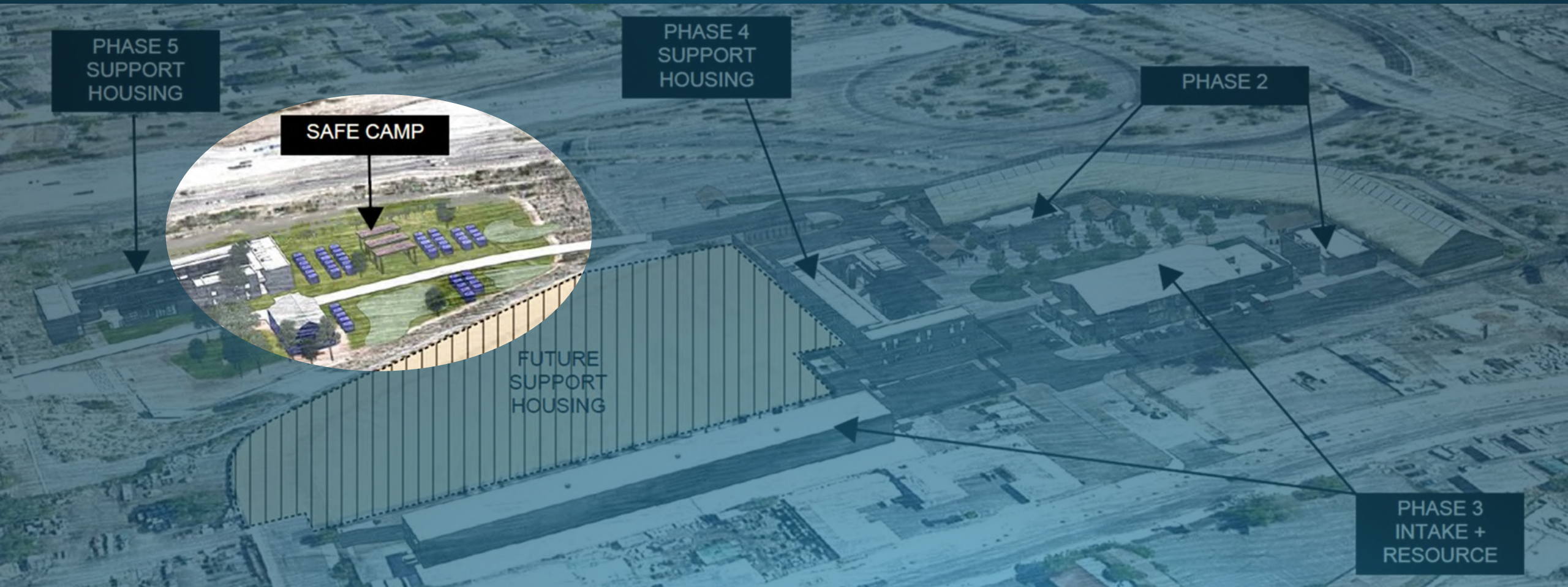
Phase III



Supportive Housing.



Cares Campus – Safe Camp





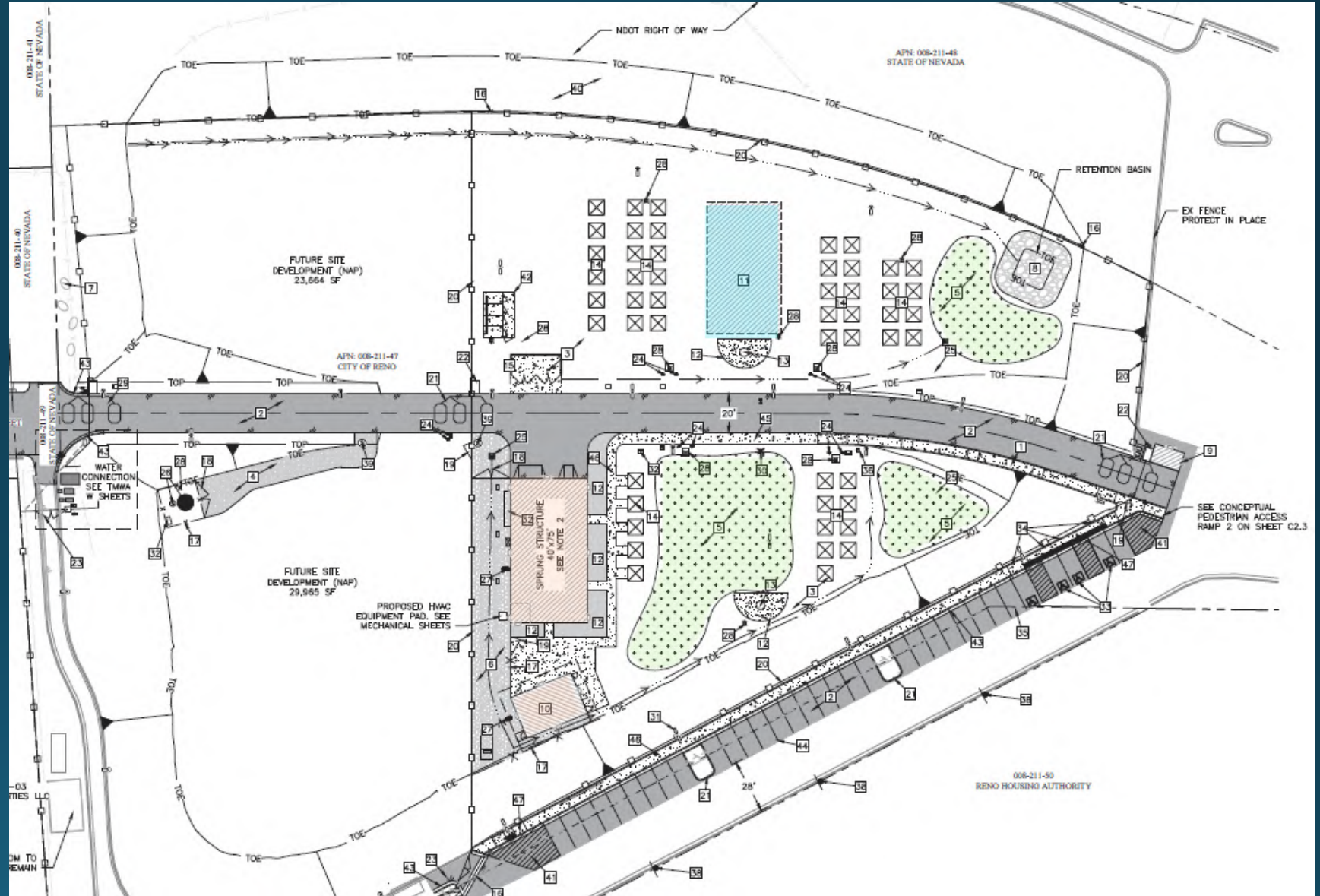
Cares Campus - Safe Camp ModPods

- Unit size: 8ft x 8ft x 8ft
- Heated and cooled
- Units purchased:
 - 50 for Safe Camp
 - 2 for isolation at Cares Campus





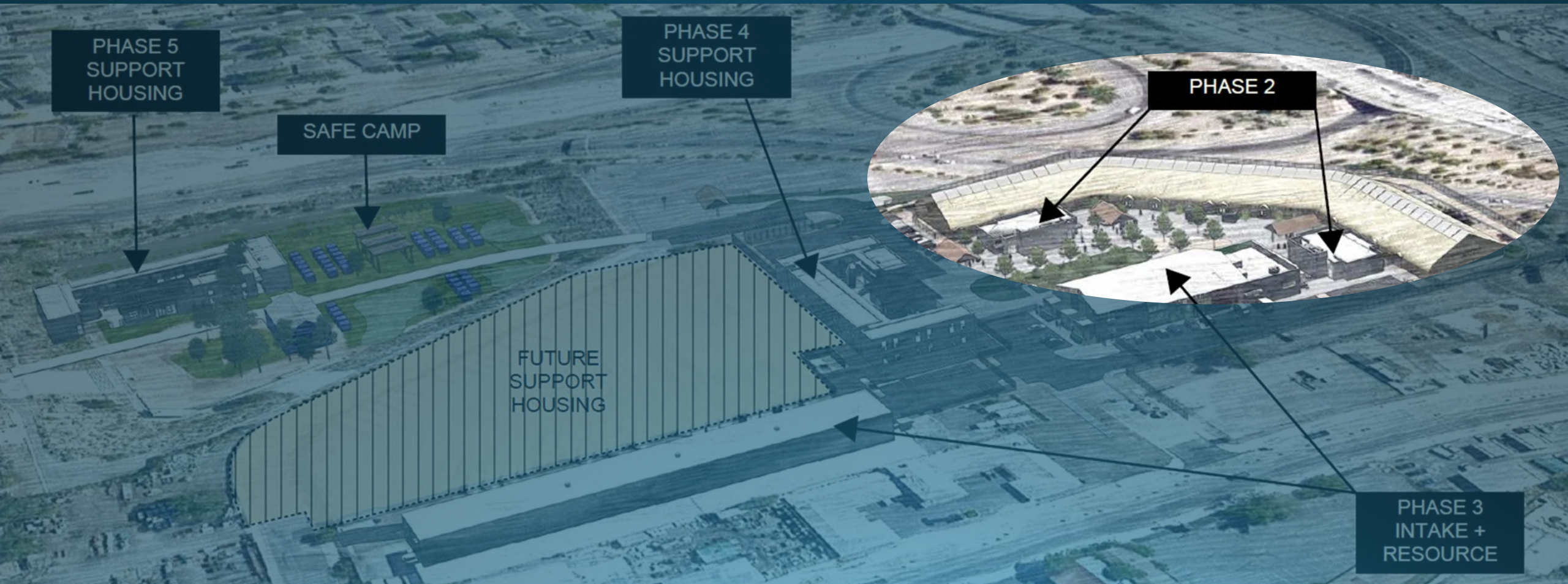
Safe Camp Site Plan





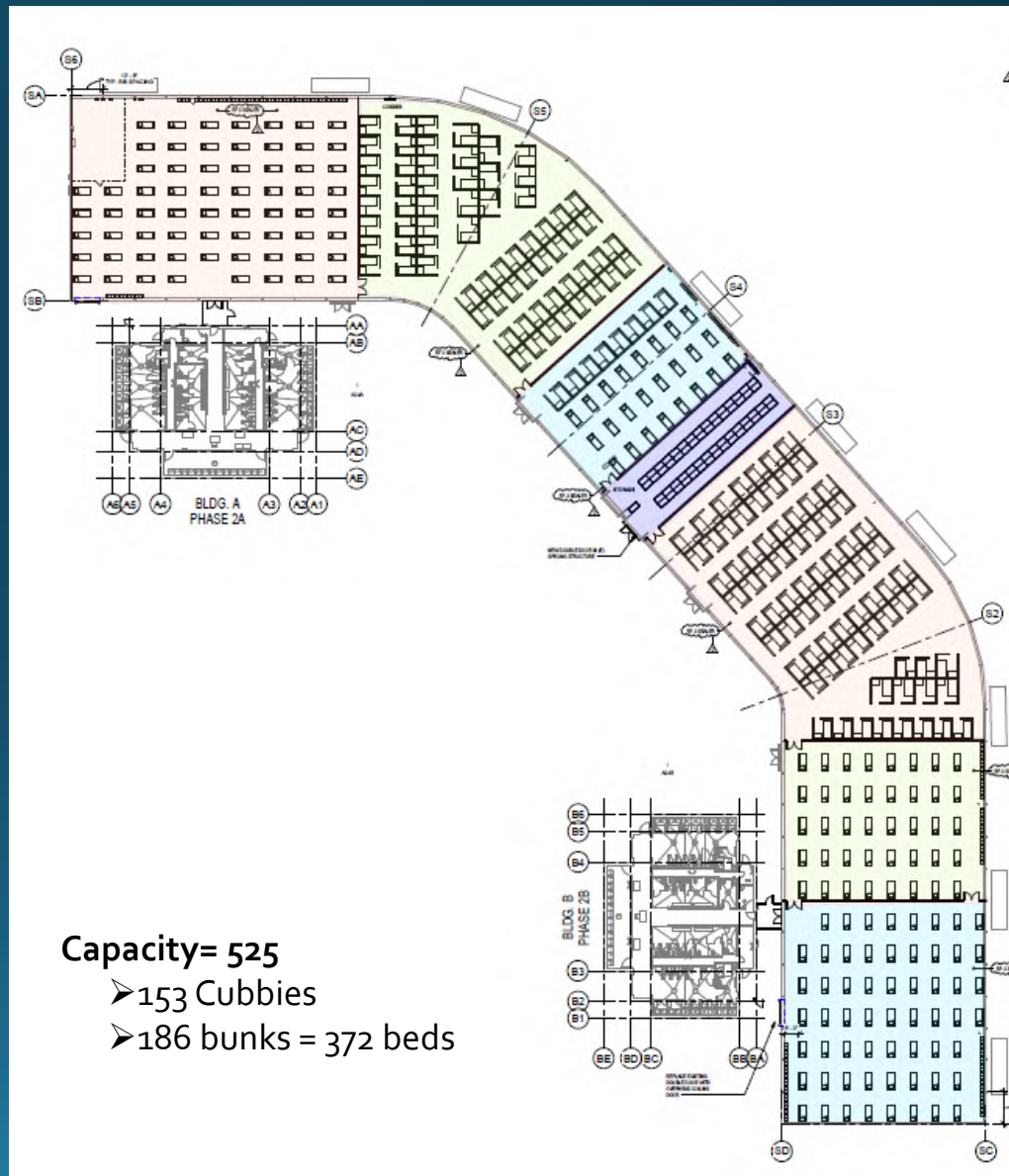
Cares Campus – Phase II

Emergency Shelter Improvements & Shower / Restroom / Laundry Buildings



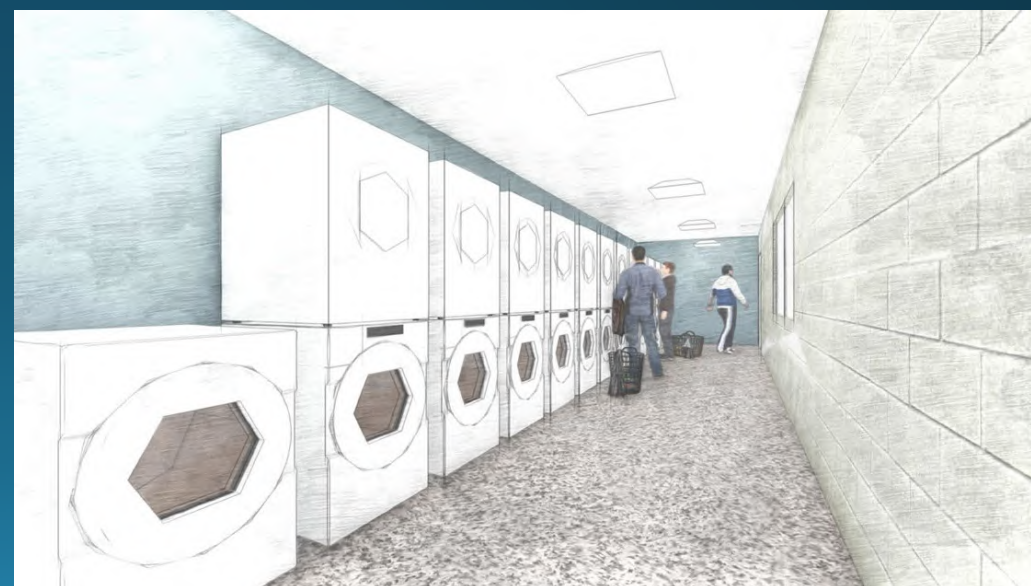
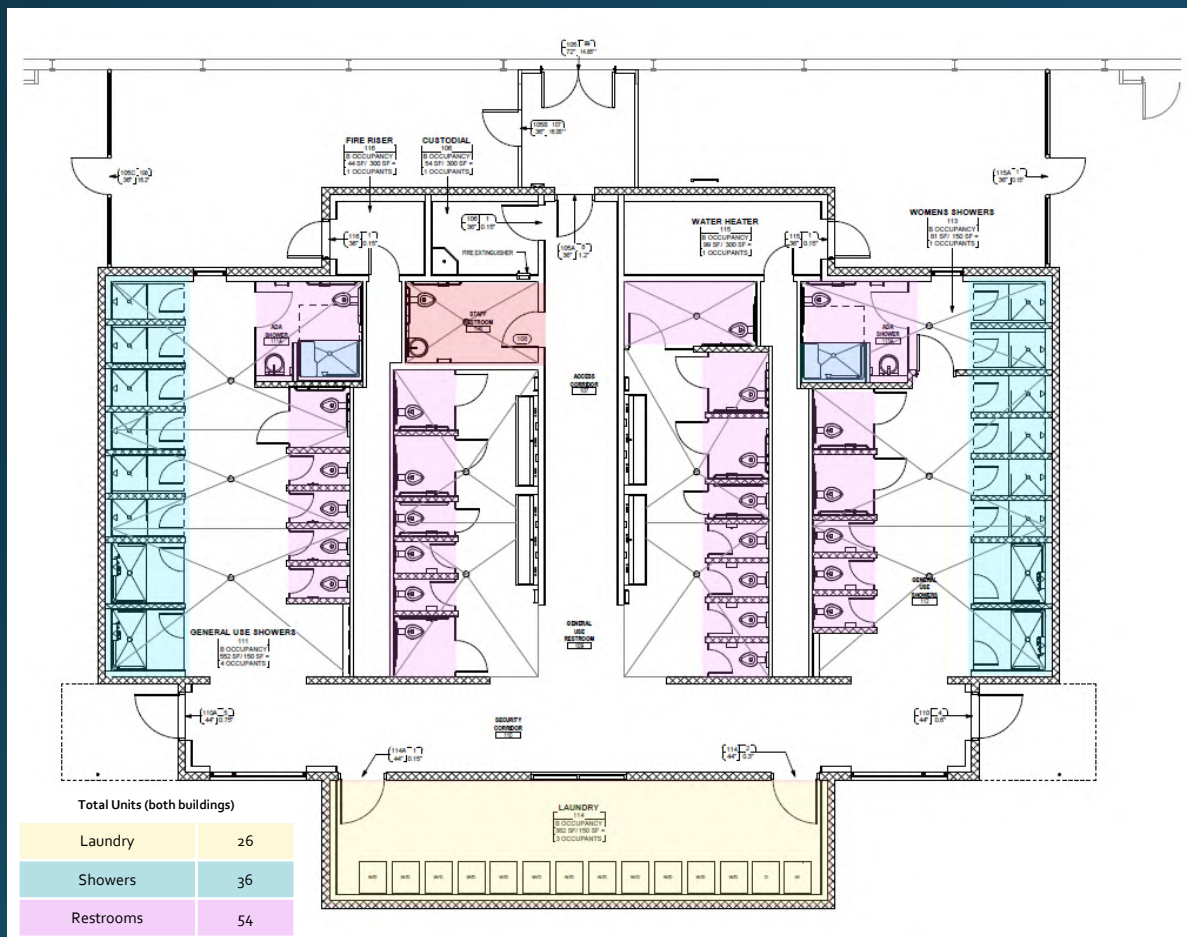


Cares Campus - Sprung Updates





Cares Campus - Showers/Restrooms/Laundry





Cares Campus – Phase II

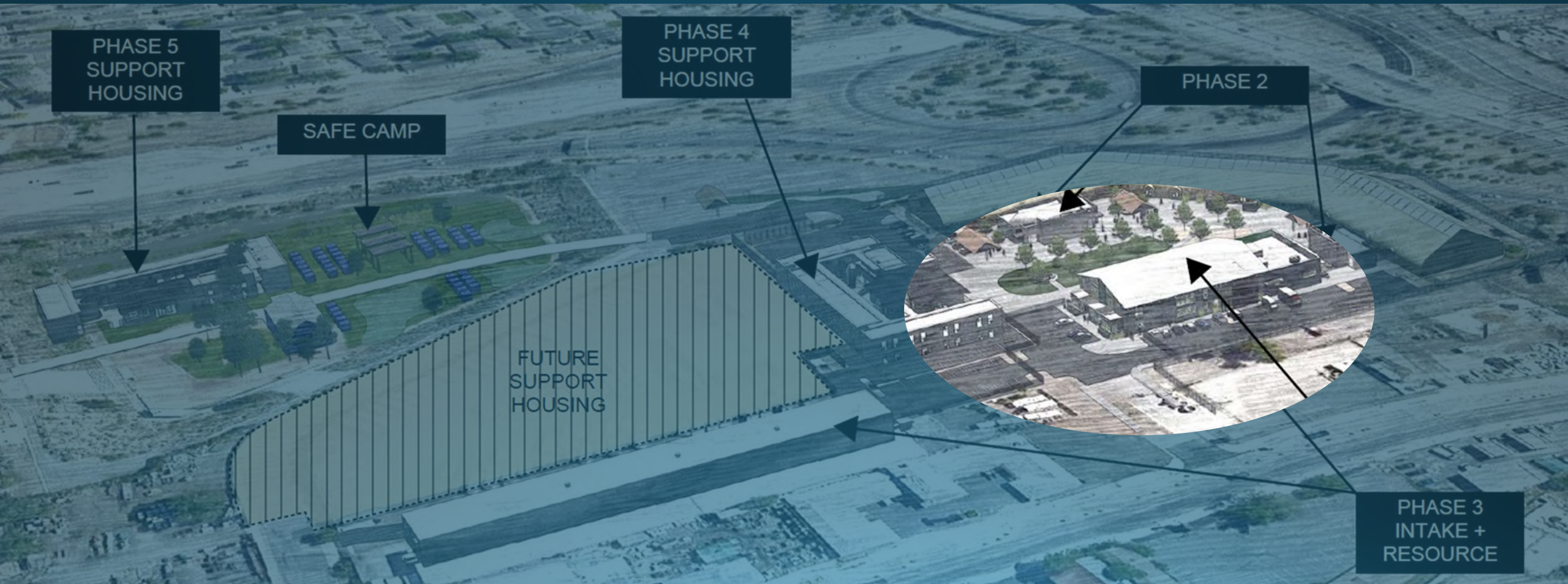
Emergency Shelter Improvements & Shower / Restroom / Laundry Buildings





Cares Campus – Phase III

Welcome Center / Case Management & Therapy / Staff Offices / Dining Hall

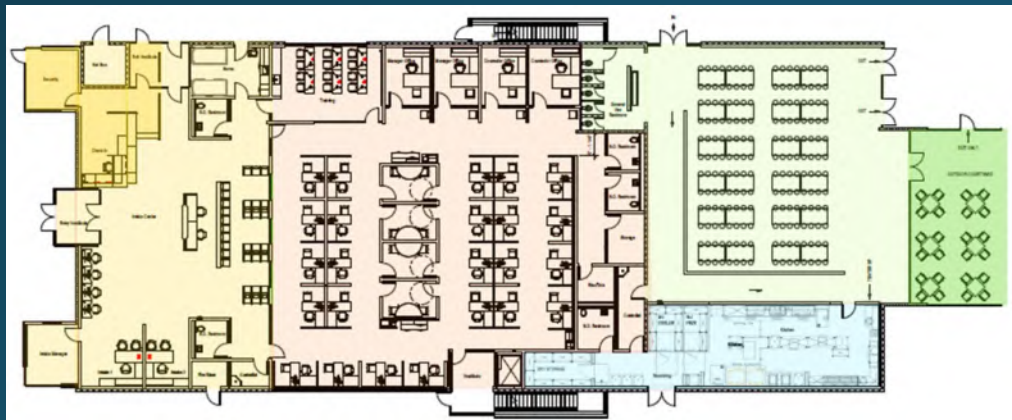




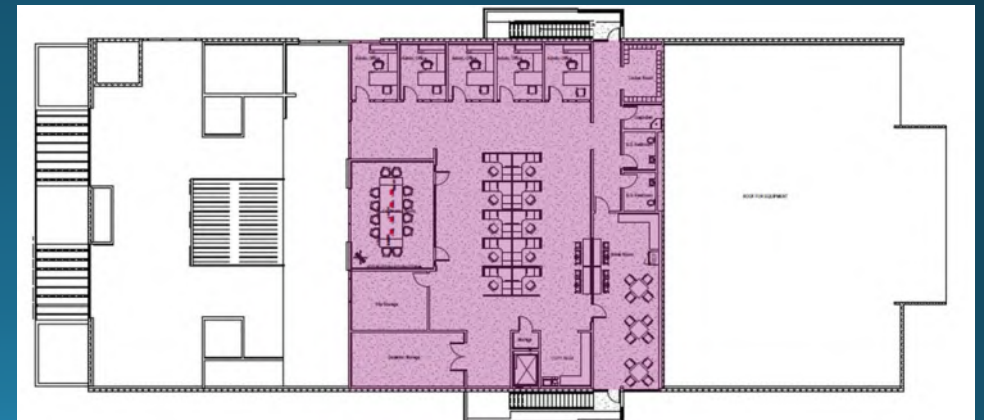
Cares Campus – Welcome Center / Case Management & Therapy / Staff Offices / Dining Hall



First Floor



Second Floor





Cares Campus - Dining Hall





Cares Campus Welcome Center – Diversion / Intake / Security





Cares Campus Welcome Center – Training / Therapy / Case Management





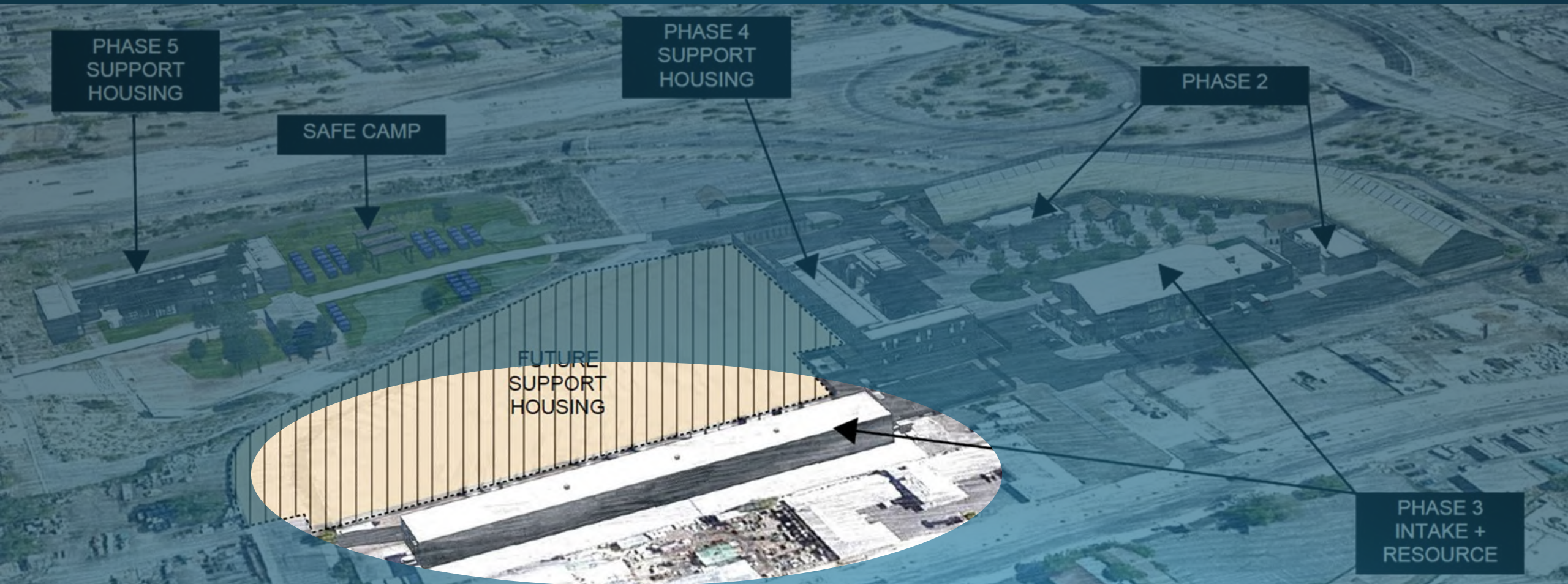
Cares Campus - Exterior and Green Space





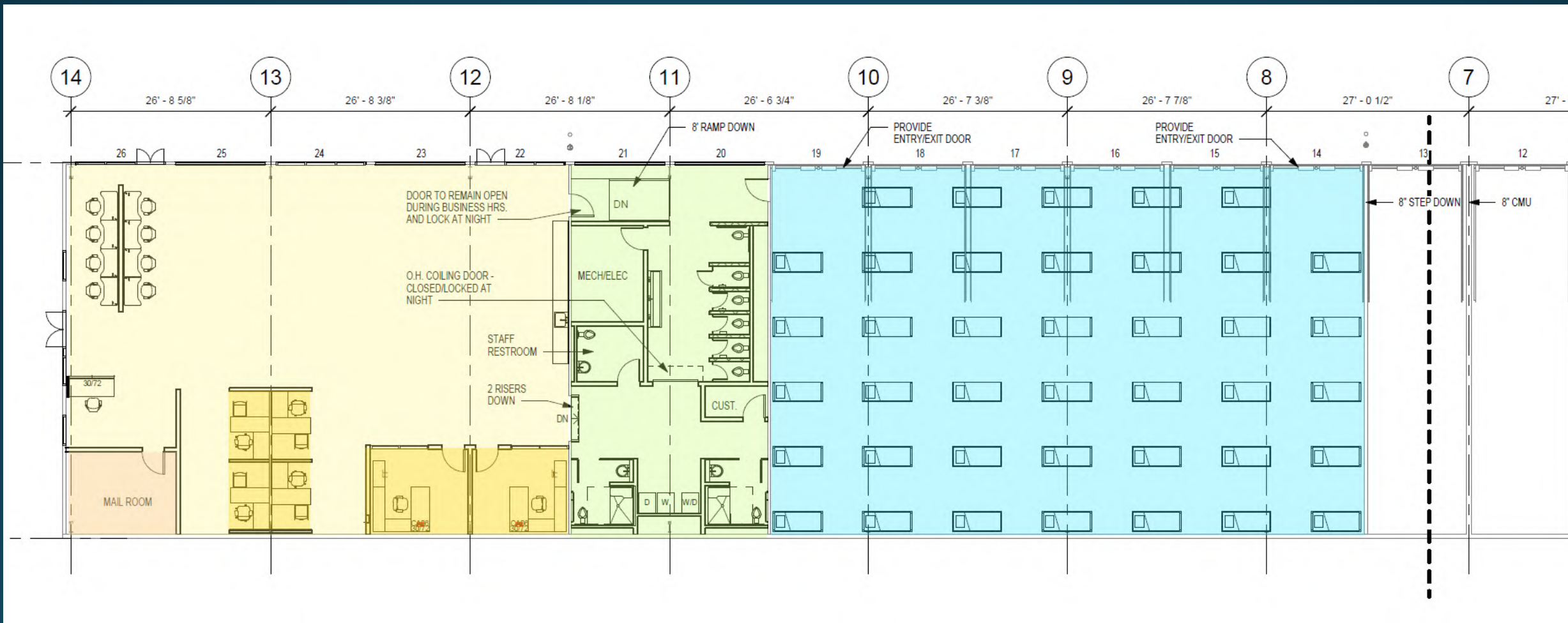
Cares Campus – Phase III

Resource Center





Cares Campus – Resource Center





Cares Campus – Resource Center





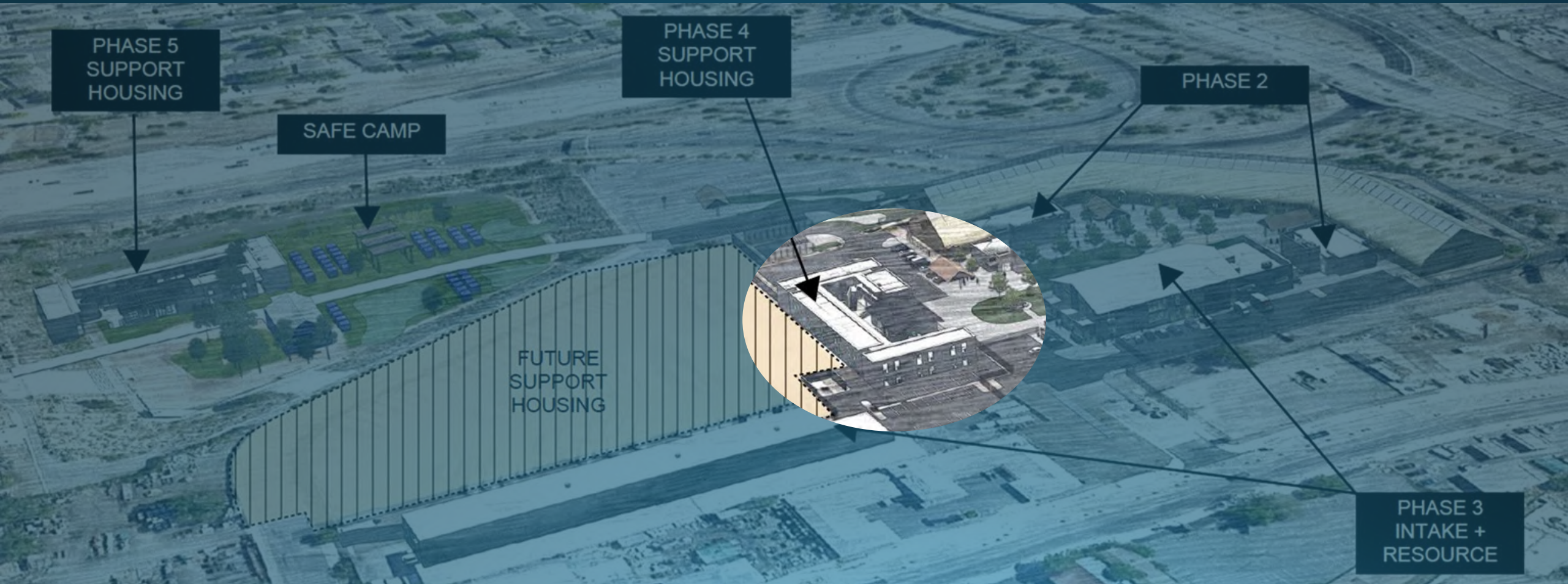
Cares Campus – Resource Center





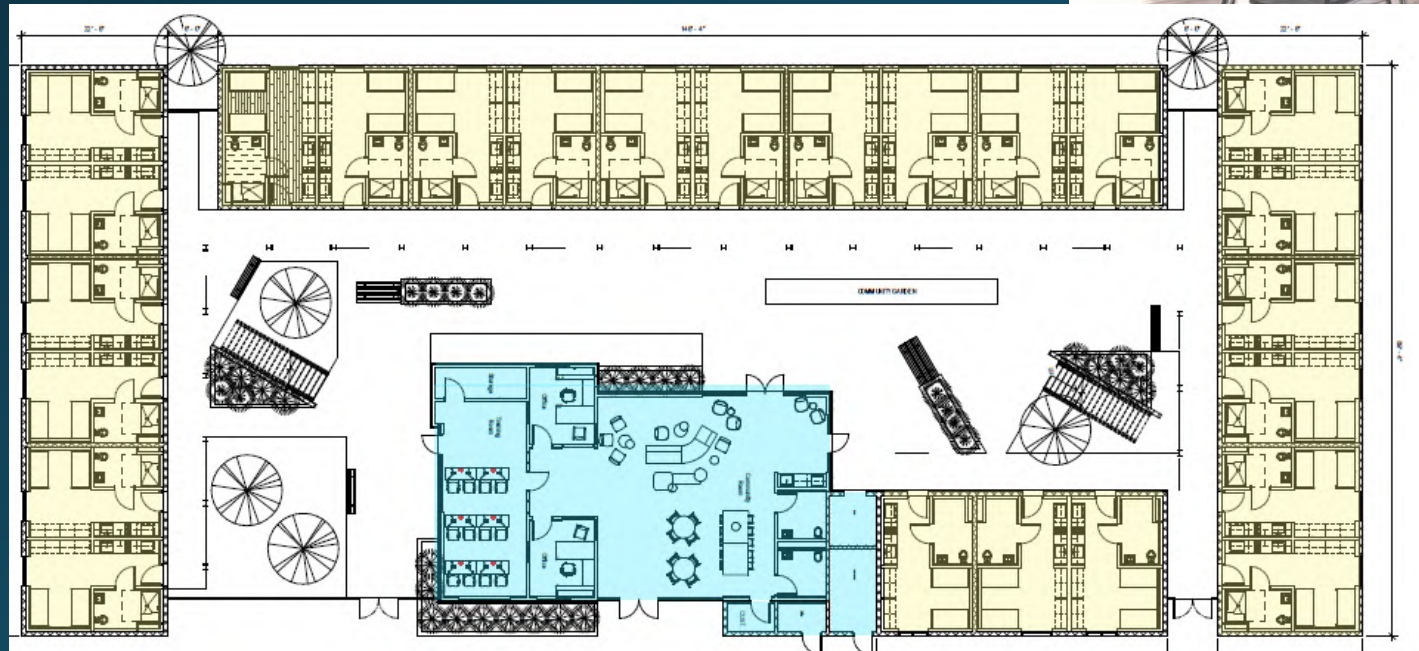
Cares Campus – Phase IV

Supportive Housing





Cares Campus – Supportive Housing





Cares Campus – Supportive Housing

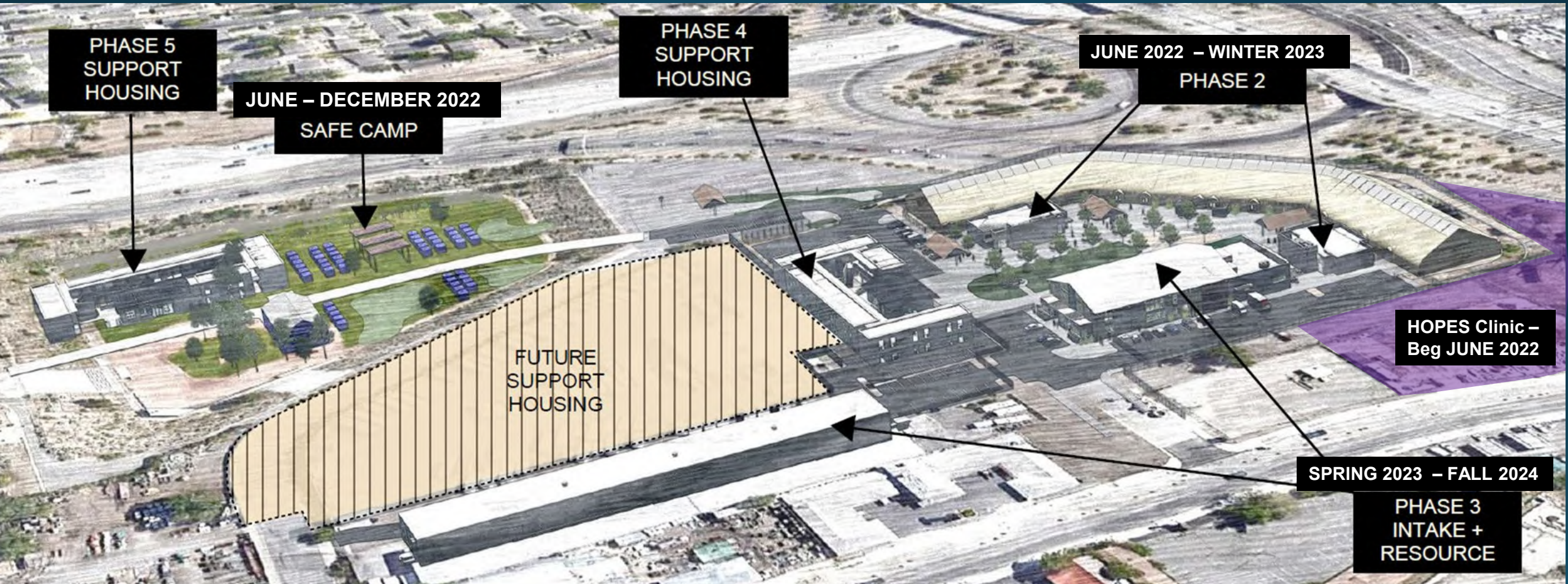




Cares Campus - Timeline

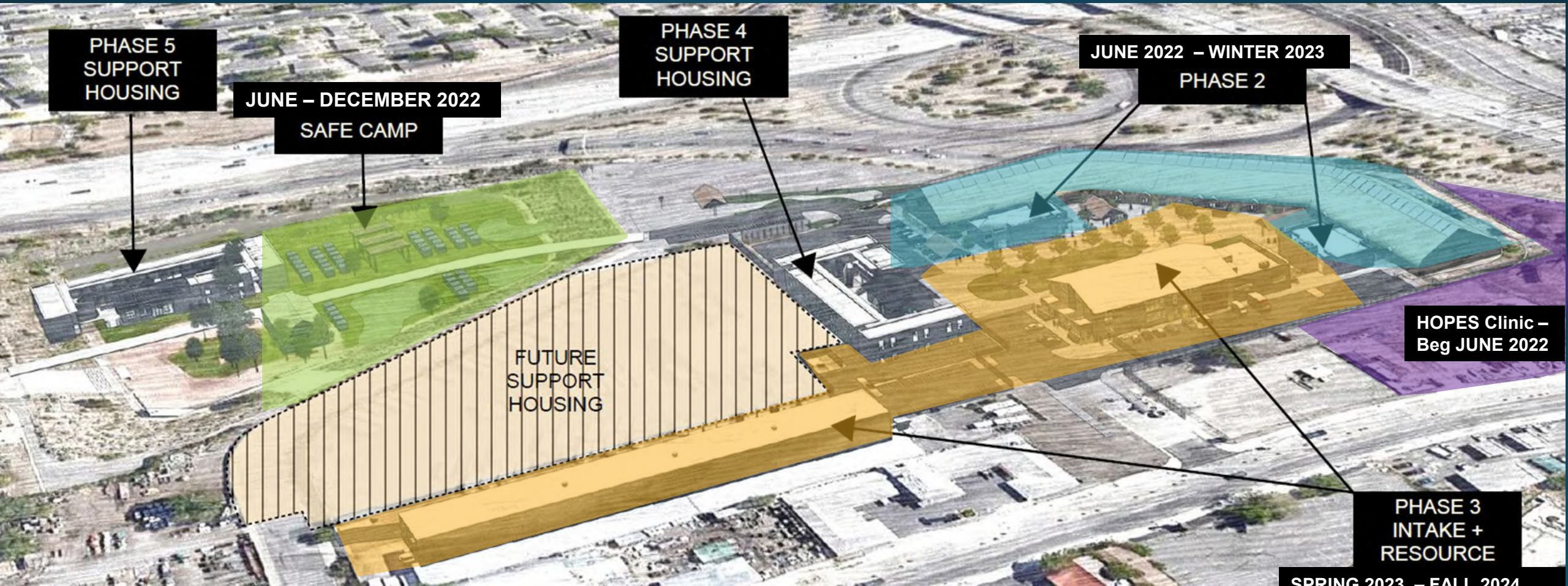


Cares Campus – Initial Construction Timeline





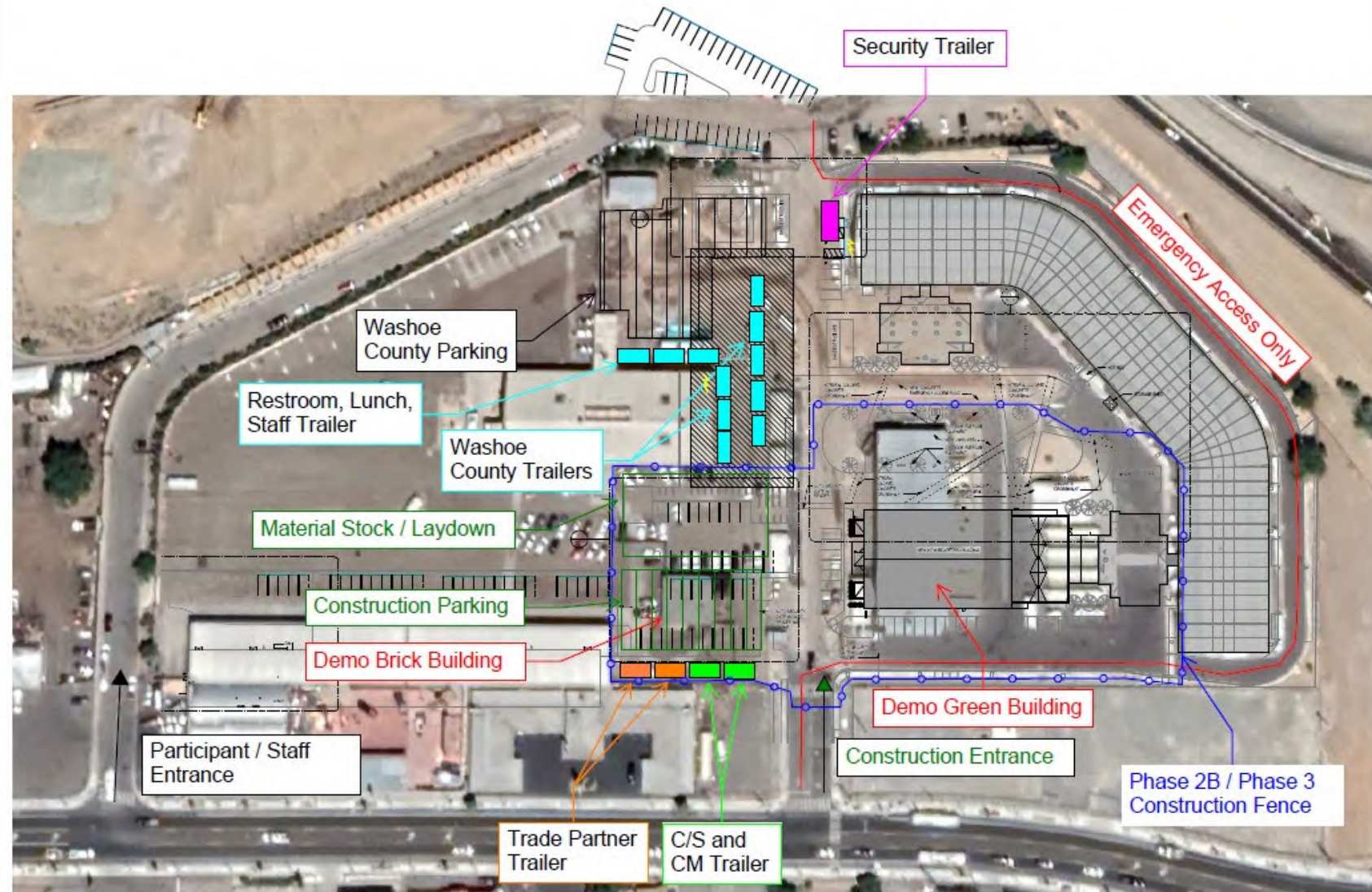
Cares Campus – Initial Construction Timeline



SPRING 2023 – FALL 2024

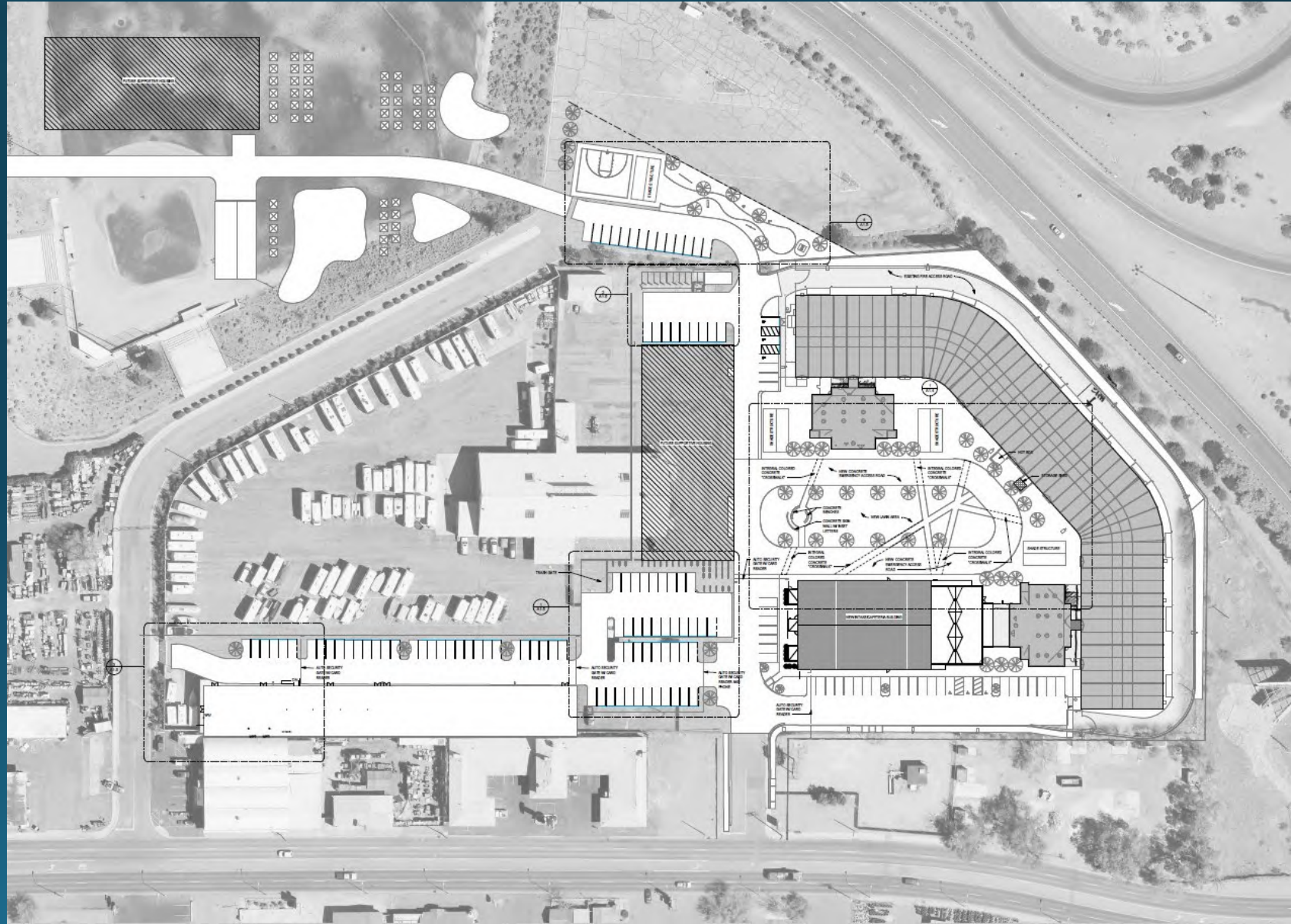


Cares Campus – Temp Site Layout #2



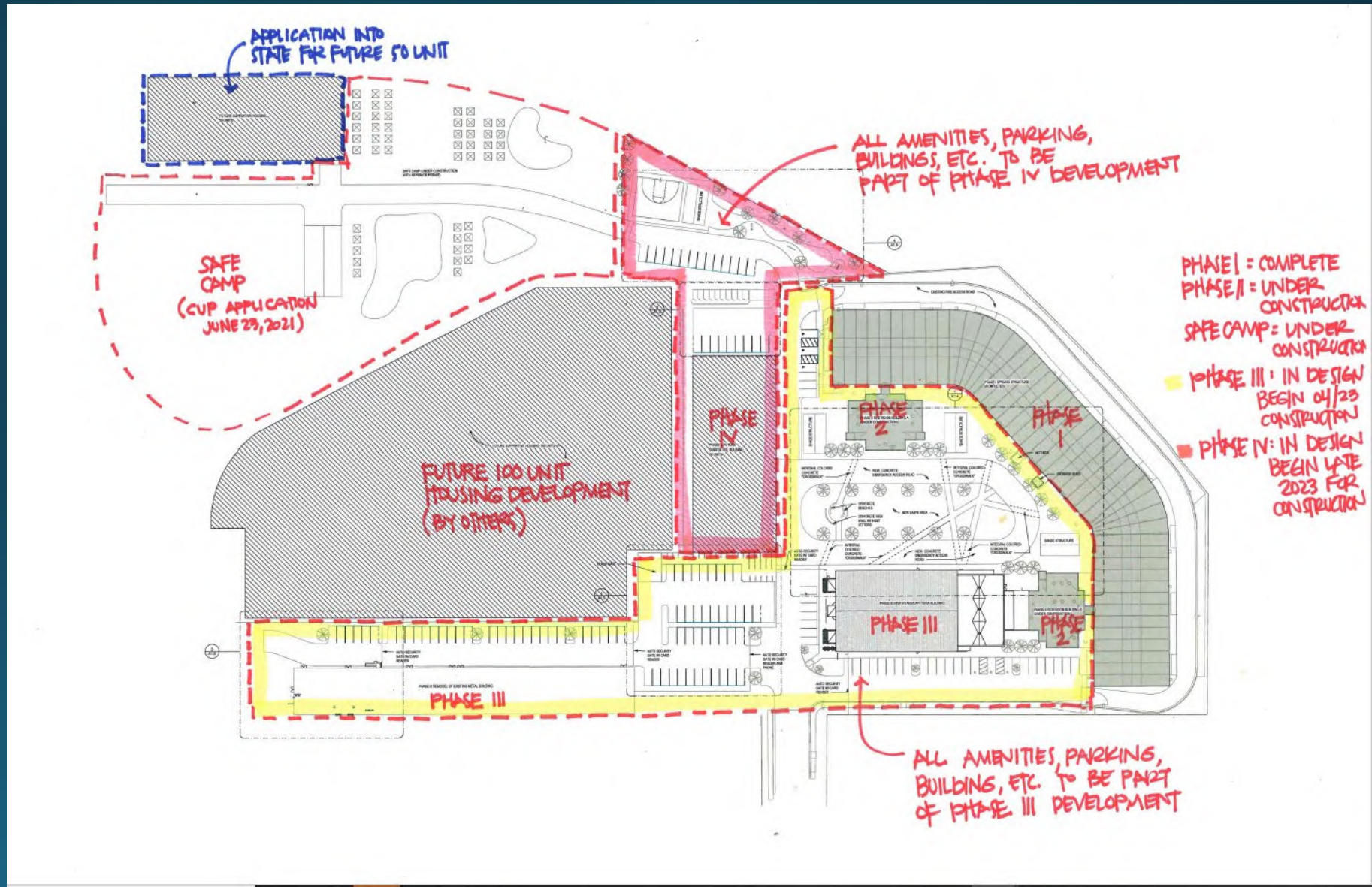


Cares Campus – Site Logistics





Cares Campus – Site Logistics



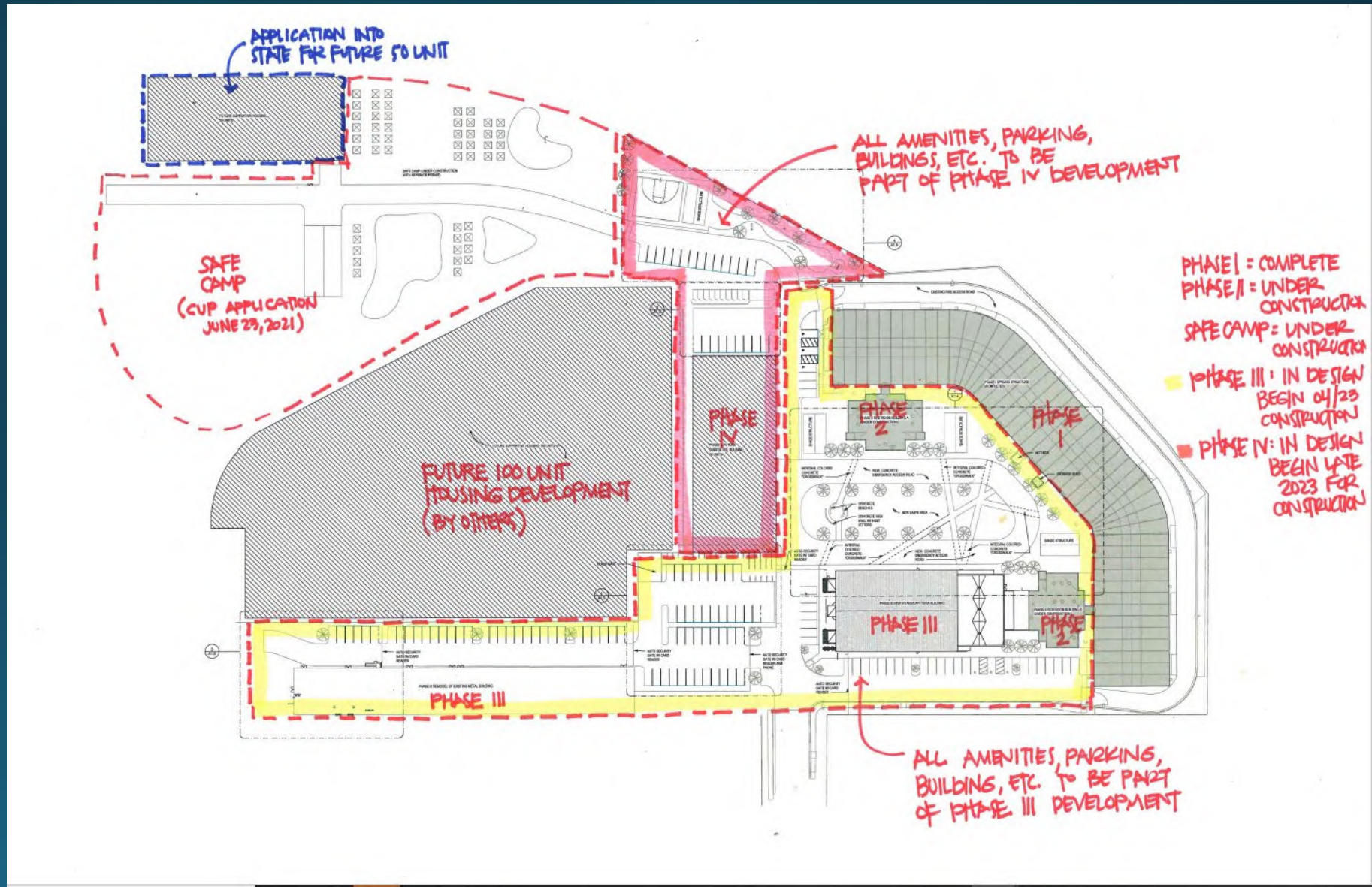


Housing and Homeless Services

www.washoecounty.gov/homelessness/



Cares Campus – Site Logistics





**PHASE 5
SUPPORT
HOUSING**

Waiting for Grant approval

In construction now, completion November 2022

SAFE CAMP

**PHASE 4
SUPPORT
HOUSING**

Planned start date November 2023

PHASE 2

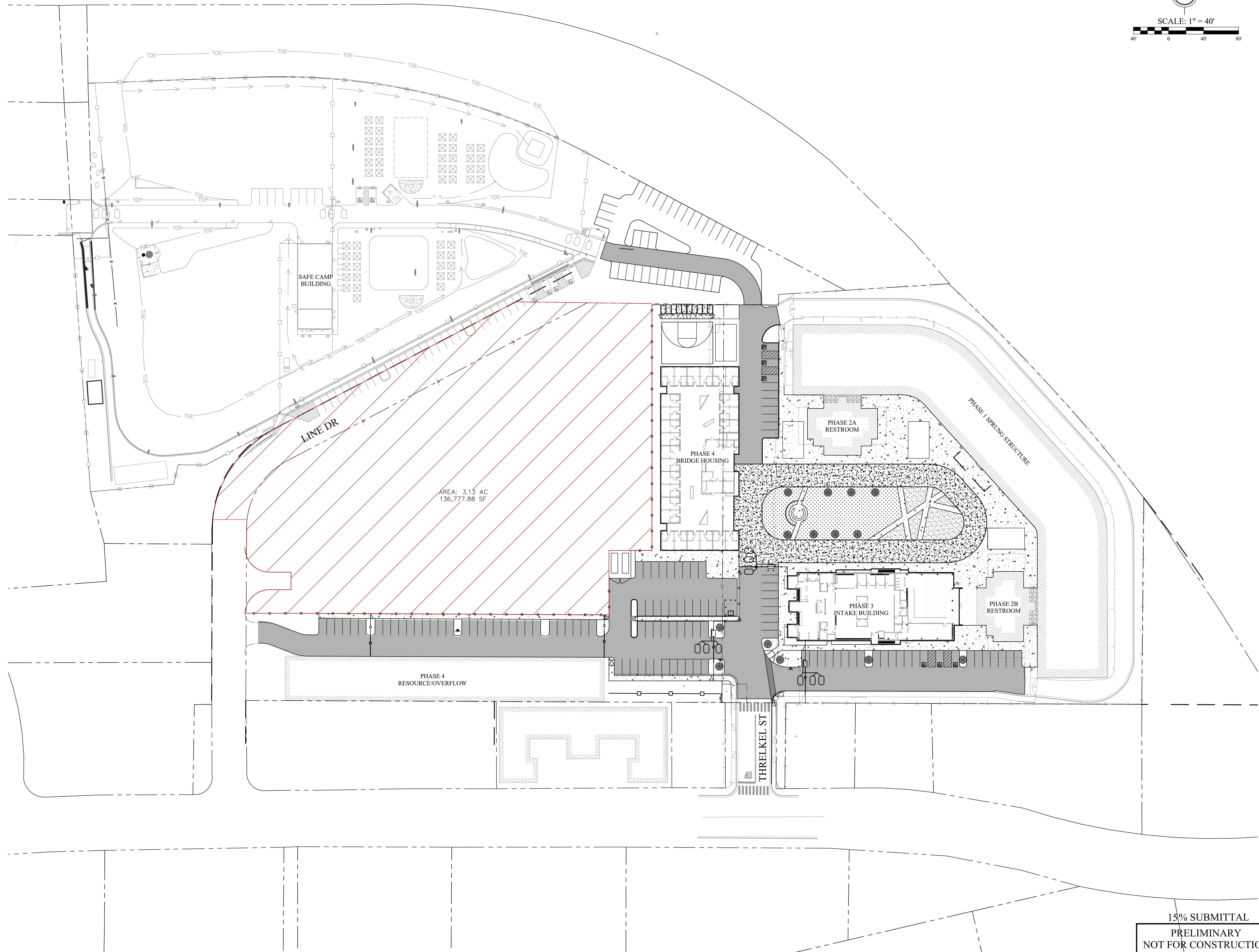
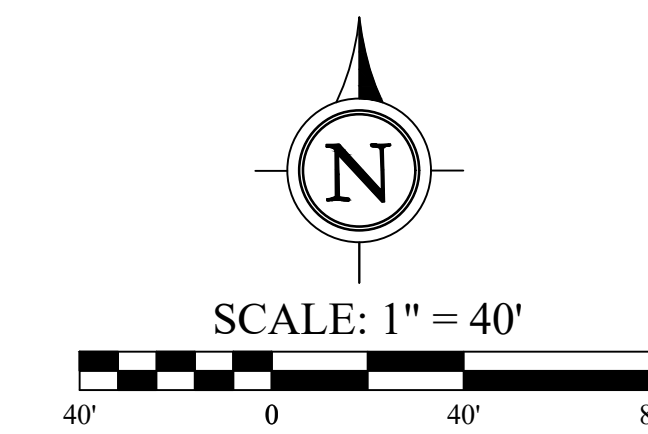
In construction now, completion December 2023

**FUTURE
SUPPORT
HOUSING**

**PHASE 3
INTAKE +
RESOURCE**

Planned start date May 2023





SAVED PATH: P:\CLIENT PROJECTS\VAN WOERTT BIGOTTI ARCHITECTS 2702301 NEVADA CARES CAMPUS PHASE III\0 DRAWINGS\3 CAD EXHIBITS\PHASE 4 SITE 7/29/2022 11:24 AM

**VanWoert
Bigotti**
 architects
1400 s. virginia st suite c
 reno, nevada 89502
 p 775.328.1910
 f 775.328.1020
 info@vwarchitects.com

construction and materials shall comply with 2018 international building code (ibc) and/or local code requirements.
 /// the design and drawings contained herein are protected under n.r.s. 623 and usc copyright title 17. unauthorized duplication or distribution is a violation of state and federal law.

REVISION SCHEDULE		
#	DATE	DESCRIPTION

Cares Campus Intake Building
Washoe County
1800 THRELKEL STREET

FARR WEST
ENGINEERING
 SCHEMATIC DESIGN

drawing title
 PHASE 4 SITE LAYOUT EXHIBIT

job number
 2301

date
 19 MAY 2022

drawing number

C3.0

15% SUBMITTAL
 PRELIMINARY
 NOT FOR CONSTRUCTION