



Date: February 5, 2018

Dear Interested Citizen:

The Carson Ranger District of the Humboldt-Toiyabe National Forest (Forest) is initiating a comment period for a preliminary Environmental Assessment (EA) for the proposed Education Land Grant Act Transfer of National Forest System Land to Washoe County School District #52446, displaying the proposed action and potential effects of the project. The Forest is proposing to convey approximately 60 acres of National Forest System land in accordance with the Educational Land Grant Act (ELGA) to the Washoe County School District (WCSD). If conveyed, the WCSD would use the land to development of a school campus. The Project Area is located in southwest Reno, Washoe County at the intersection of Thomas Creek Road and Arrowcreek Parkway. Specifically, the project area is located at T. 18 N., R. 19 E., Sec. 24 S ½ SE ¼, excepting that portion conveyed by U.S. Patent No. 27-96-0035.

The preliminary EA, including the proposed action, is available for review and can be downloaded from the Humboldt-Toiyabe National Forest website at <https://www.fs.usda.gov/project/?project=52446>. To obtain a hard copy of the preliminary EA and proposed action please contact *Irene Davidson, Carson District Ranger, Humboldt-Toiyabe National Forest, 1536 S. Carson Street, Carson City, NV, 89701, 775 884-8100 idavidson@fs.fed.us*.

This preliminary EA is subject to comment pursuant to 36 CFR 218, Subparts A and B. Only those who submit timely project-specific written comments during a public comment period are eligible to file an objection. Furthermore, issues raised in objections must be based on previously submitted specific written comments regarding the proposed conveyance or activity and attributed to the objector, unless the issue is based on new information that arose after the opportunities for comment. Individuals or representatives of an entity submitting comments must sign the comments or verify identity upon request.

HOW TO COMMENT AND TIMEFRAMES

The Forest Service will accept comments on the preliminary EA for 30 days following publication of the opportunity to comment legal notice in the Reno- Gazette Journal, which is the exclusive means for calculating the comment period. Commenters should not rely upon dates or timeframe information provided by any other source. It is the commenter's responsibility to ensure timely receipt of comments (36 CFR 218.25).

Please submit your comments on the proposal website, at <https://cara.ecosystem-management.org/Public/CommentInput?project=52446>. If your computer is not compatible with the website, try using a different web browser, or you can email comments to: comments-intermtn-humboldt-toiyabe-carson@fs.fed.us. All formal comments on the EA must be submitted in writing.

In cases where no identifiable name is attached to a comment, a verification of identity will be required for appeal eligibility. If using an electronic message, a scanned signature is one way to provide verification. It is the responsibility of persons providing comments to submit them by the close of the comment period. Names of commenters will be part of the public record subject to the Freedom of Information Act.

The Forest Service will host an open house forum meeting to discuss the preliminary EA and the Forest Service's decision to be made. The meeting will be held at 6:30 pm on February 22, 2018 at



the South Valley Library Diamond Room, located at 15650-A Wedge Parkway, Reno, NV 89511.
The meeting will include a brief introduction of the proposed land conveyance by the Forest Service followed by an opportunity to discuss with Forest staff members.

Sincerely,



WILLIAM A. DUNKELBERGER
Forest Supervisor





United States Department of Agriculture
Forest Service

Educational Land Grant Act Transfer of National Forest System Land to Washoe County School District #52446 Preliminary Environmental Assessment

Carson Ranger District, Humboldt-Toiyabe National Forest, Washoe County, Nevada
January 5, 2017



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Introduction

Commented [A1]: Includes EN edits from 11/10/17 and Jim Winfry's from 11/27

The United States Forest Service (USFS), Humboldt-Toiyabe National Forest (Forest) is proposing to convey approximately 60 acres of National Forest System land in accordance with the Educational Land Grant Act (ELGA) to the Washoe County School District (WCSD) to support the development of a school campus. These actions are proposed to be implemented on the Carson Ranger District of the Humboldt-Toiyabe National Forest in Washoe County, Nevada (reference Figures 1 and 2).

This Environmental Assessment (EA) was prepared to determine whether implementation of the land conveyance and subsequent development of a school campus by WCSD may significantly affect the quality of the human environment and thereby require the preparation of an environmental impact statement. By preparing this EA, we are fulfilling agency policy and direction to comply with the National Environmental Policy Act (NEPA). For more details of the proposed action, reference the Proposed Action and Alternatives section of this document.

The Forest has prepared this EA pursuant with the requirements of the NEPA and its implementing regulations issued by the Council on the Environmental Quality (40 Code of Federal Regulations 1500-1508). The Forest is the lead agency for this EA.

Proposed ELGA Project Location

The application is for the following described public land referred to as the ELGA Project Area:

Approximately 60 acres, more or less, located at T. 18 N., R. 19 E., Sec. 24 S ½ SE ¼, excepting that portion conveyed by U.S. Patent No. 27-96-0035

Project Background

Educational Land Grand Act

The ELGA (114 Stat. 368; 16 U.S.C. 479a) authorizes the USFS to convey up to 80 acres of National Forest System lands to public school districts for educational purposes upon application by the school district. Conveyance under the ELGA shall be for a nominal cost and may not include the transfer of mineral or water rights. The act requires:

1. The land to be conveyed will be used for a public or publicly funded elementary or secondary school, to provide grounds or facilities related to such a school, or for both purposes;
2. A determination that the conveyance is in the public interest;
3. The land to be conveyed is not needed for other National Forest System purposes;
4. The land to be conveyed has been identified as available for disposal in the land and resource management plan;
5. The conveyance would serve public objectives that outweigh the objectives and values that would be served by maintaining the land in Federal ownership; and

Figure 1. Vicinity Map

Figure 2. Project Location Map

6. The total acreage to be conveyed is the minimum amount reasonably necessary for the intended purpose and does not exceed 80 acres.

Under the provisions of the ELGA, up to eighty acres of National Forest System lands may be conveyed to a public-school district for use by a public or publicly funded primary or secondary school district. For purposes of the ELGA, an educational use of conveyed land is a use that directly relates to the instruction of students. The educational aspects of this use must be more valuable than its non-educational aspects.

Section (e) of the ELGA (114 Stat. 368; 16 U.S.C. 479a) states that if at any time after lands are conveyed pursuant to the ELGA, the entity to whom the lands were conveyed attempts to transfer title or control over the lands to another or to a use other than the use for which the lands were conveyed, title to the land shall revert to the United States.

Washoe County School District (WCSD)

The WCSD has experienced high enrollment growth over the last three years due to very high levels of residential construction and economic growth throughout Washoe County. Much of this new growth has been directed toward outlying suburban areas in Southwest Reno, including the Double Diamond, Damonte, and Bella Vista subdivisions. Because of this concentration of growth, WCSD schools are close to, at, or over capacity. WCSD enrollment levels have historically grown at 3.5% per year (equivalent to 1,619 students/year). Over the last three years, however, enrollment in WCSD slowed and then stabilized to between 0.5-1.0% per year and is forecast to rise by at least 1.7% per year (1,300 students/year) annually for the next several years. In addition to the overcrowding, the facility needs of the WCSD continue to grow as older schools become less viable in a technology-dependent world and newer schools remain crowded.

The WCSD proposes to build a new school campus located at the northwest corner of Thomas Creek Road and Arrowcreek Parkway, Reno, Nevada. The site is anticipated to be used as a school campus that will be built in three phases. Based on current needs outlined in WCSD's 10-year plan, Phase 1 would include development of the Arrowcreek Middle School. Construction of the Arrowcreek Middle School would provide immediate relief to Depoali Middle School and Pine Middle School, both of which are over their design capacities. The Arrowcreek Middle School would also relieve overcrowding at eight elementary schools located in south Reno as they would be able to transfer sixth graders currently attending the elementary school to the various middle schools within their school zone.

Development of Phases 2 and 3 would be determined by WCSD based on anticipated future needs of the District. Procurement of the land in advance of the immediate need provides the WCSD flexibility in planning and efficiencies in land planning. It is anticipated that Phase 2 would most likely be used as an outdoor science classroom with trail system to enhance the educational opportunities of the middle school, and Phase 3 may be developed as a specialized high school / academy.

On November 8, 2016, Washoe County voters approved WC-1, which provides the WCSD funding to repair and renovate older schools, and to build new schools to address overcrowding and provide additional space for community growth. The WC-1 initiative identified Arrowcreek Middle School as a top priority for construction.

Site and Application History

- March 17, 1966, a Bureau of Land Management (BLM) Recreation and Public Purpose Lease (Nev-066123) for 120 acres was issued to the WCSD for use as a school campus. The lease expired on March 16, 1986 without the land being developed.
- On April 26, 1989, the parcel was transferred from the BLM to the US Forest Service pursuant to National Forest and Public Lands of Nevada Enhancement Act of 1988 (Public Law 100-550, 102 STAT. 2749).
 - At the time of transfer, the parcel remained classified for disposal by the BLM under authority of the Taylor Grazing Act of 1934.
- In December 2004, the WCSD filed an ELGA application for the 100-acre Thomas Creek Road School Site, and the application was acknowledged by the Humboldt-Toiyabe NF Supervisor on January 19, 2005.

- In 2016, the subject parcel was identified on the draft Washoe County Public Lands Bill Map #2 – Land Transfer Request. The map identified federal lands that have been requested for transfer from BLM and USFS jurisdiction to local jurisdiction, such as Sparks, Washoe County or to public entities such as the WCSD or the Truckee Meadows Water Authority for a variety of public purposes.
 - Washoe County hosted two open house events for the public to learn more about the Public Lands Bill in September 2016.
 - There also was a Public Lands Open Forum at the Reno-Sparks Convention Center on Nov. 2, 2016.
- In March 2017, the WCSD withdrew the 2004 ELGA application in favor of filing a new application.
- On April 26, 2017, WCSD filed an ELGA application covering 60 acres for the development of the Arrowcreek School Campus.

Need for the Proposal

The Forest is required to respond to the application for conveyance filed by WCSD as required by the ELGA (Section 2(d)(2)). The Forest needs to consider the WCSD application because it meets the specific criteria required under ELGA as discussed above and is consistent with management guidelines in the Toiyabe Land and Resource Management Plan (1986 LRMP).

Conveyance of the land from the Forest to WCSD would be in the public's best interest. The WCSD has identified a need for greater capacity to meet the educational needs of Washoe County students. Enrollment rates have historically grown by 3.5% (or 1,619 students) per year and are projected to rise by 1.7% annually for the next several years. Development of a middle school will eliminate or substantially reduce current or projected overcrowding over the next decade for eight elementary and two middle schools. In doing so, it will also open up a significant number of classrooms that can be used for expansion of special education and other programs in the affected schools. The County voters approved a bond issue to fund school construction to meet this need, and construction of the Arrowcreek Middle School was identified as high priority.

Decision to be Made

The decision to be made by the Forest is whether or not to convey the 60-acre parcel meeting the criteria of the ELGA to WCSD and whether further environmental documentation in an environmental impact statement is needed. The Forest must determine that conveyance of the land meets the following criteria:

1. The land to be conveyed will be used for a public or publicly funded elementary or secondary school, to provide grounds or facilities related to such a school, or for both purposes;
2. A determination that the conveyance is in the public interest;
3. The land to be conveyed is not needed for other National Forest System purposes;

4. The land to be conveyed has been identified as available for disposal in the land and resource management plan;
5. The conveyance would serve public objectives that outweigh the objectives and values that would be served by maintaining the land in Federal ownership; and
6. The total acreage to be conveyed is the minimum amount reasonably necessary for the intended purpose and does not exceed 80 acres.

If the analysis demonstrates there are no significant environmental impacts from conveyance of the land and development of the school campus meets the ELGA criteria, the responsible office would record the Decision Notice (DN) and Finding of No Significant Impact (FONSI). The responsible official for the project is the Forest Supervisor.

The Forest does not decide on the type or design of the school facilities to be constructed. WCSD would be responsible for development of the school and obtainment of the appropriate permits for construction.

Public Involvement and Tribal Consultation

As part of the review process, the Forest involved members of the public, residents, recreation groups, state and local government agencies, and interested Tribes. The notices and public meetings are provided below:

- A public scoping notification was mailed to interested parties, adjacent landowners, and local, State, and federal agencies notifying recipients of the public meeting and detailing the project background, project location and NEPA process. This notification was mailed to approximately 93 parties on September 12, 2017.
- The scoping letter was made available on September 13, 2017 to the public on the Humboldt-Toiyabe National Forest website at: <https://www.fs.usda.gov/project/?project=52446>, and on September 14, 2017 on the WCSD website at <http://www.wcsdbuilding.com/middle-school-south-reno/>. The public scoping comment period ended on October 20th, 2017.
- A public open house meeting was held on October 11, 2017 at Hunsberger Elementary School.
- Tribal consultation with the Washoe Tribe of California and Nevada and the Reno Sparks Indian Colony began in the fall 2017 and is on-going.

In addition to the public notification and consultation described above, WCSD has initiated coordination with the following groups:

Tribes

Washoe Tribe of Nevada and California
Reno-Sparks Indian Colony

Federal, State and Local Agencies

US Fish and Wildlife Service

Nevada Department of Wildlife
State Historic Preservation Office
Multiple State agencies through the Nevada Clearinghouse

Organizations

Washoe County Planning Department
Washoe County Building and Safety Department
Regional Transportation Commission
Washoe County Air Quality Management District
Truckee Meadows Fire Protection District
City of Reno

Comments Received During Scoping

The Forest reviewed all comments from public and internal scoping. A total of 401 comments letters were received via email and on the Forest webpage as a result of the public notification actions. In addition, another 28 written comments were received at the public Town Hall meeting held on October 11, 2017. The Forest used the issue statements to focus the environmental analysis process. While many of the responses were supportive of the proposed project, the following issues of concern were identified:

- Traffic design, congestion, speed and public safety
- Increased noise associated with construction and long-term operation
- Impacts to visual resources
- Impacts from increased lighting
- Affects to property values
- Impacts to cultural and heritage resources
- School design
- Loss of open space and recreation
- Alternative site selection
- Zoning consistency
- Lack of demonstrated need

Several additional comments were made as to the design of the school and operational procedures, which are outside the scope of NEPA environmental review. Design and implementation of the proposed school campus would be completed solely by WCSD. Opportunities for public review and comment on these issues will be available through the County's review and discretionary approval process, which will be required for each new proposed school facility. A summary of NEPA scoping issues identified is in the project record and presented in Attachment A.

Applicability of the Forest Plan, Laws, Regulations, Policies and Other Directions

Plans of Other Agencies

There are no other federal lands except National Forest lands adjacent to or within the immediate vicinity of the ELGA Project Area. Therefore, no other current federal agency plan would influence the Forest's decision-making action. The parcel was conveyed to the Forest Service from the BLM in 1989, under the National Forest and Public Lands of Nevada Enhancement Act

of 1988 (Nevada Enhancement Act). Under that Nevada Enhancement Act, land conveyed to the Forest Service was to remain subject to the direction in the BLM plan in effect at the time of the conveyance, until the Forest's LRMP was revised. Therefore, though the land became part of the Toiyabe National Forest in 1989, and is subject to Forest Service planning regulations, the direction in the BLM's Lahontan Area Resource Management Plan (RMP) still applies. The 1985 RMP, as amended in 1987, identified this parcel as available for disposal from Federal ownership.

Once conveyed to WCSD, development of private land is governed by the Washoe County Master Plan and Truckee Meadows Regional Plan.

Applicable Laws, Regulations and Policies

A list of federal laws and executive orders that pertain to project-specific planning and environmental analysis on federal lands is presented below:

- Toiyabe National Forest Land and Resource Management Plan (LRMP)
- National Environmental Policy Act (NEPA)
- Endangered Species Act (ESA)
- National Forest Management Act (NFMA)
- National Historic Preservation Act (NHPA)
- Archaeological Resource Projection Act (ARPA) of 1974, as amended
- American Indian Religious Freedom Act (AIRFA) of 1978, as amended
- Clean Air Act (CAA) 1970, as amended
- Clean Water Act (CWA) of 1977, as amended
- Executive Order 11593 (cultural resources)
- Executive Order 11988 (floodplains)
- Executive Order 11990 (wetlands)
- Executive Order 12898 (environmental justice)
- Executive Order 12962 (aquatic systems and recreational fisheries)
- Executive Order 13007 (Indian sacred sites)
- Executive Order 11593 (cultural resources)
- Executive Order 13186 (migratory birds)

Forest Plan Management Direction and Consistency

The Toiyabe Land and Resource Management Plan (LRMP) contains the management directives for the Forest. The land proposed for conveyance under the WCSD's ELGA application is consistent with the Forest's management direction regarding land conveyance. Section (2) F and G of the LRMP requires the following when considering land adjustments:

(2) Evaluate each land adjustment proposal using the following criteria to determine suitability and/priority for adjustment.

A. Meets habitat needs for wildlife species with emphasis on deer winter range.

B. Meets the needs for developed recreation.

- C. Meets the needs for dispersed recreation.
- D. Protects or enhance wilderness values.
- E. Protects or enhances visual quality objectives.
- F. Improves management efficiency and administration by reducing common property boundaries and right-of-ways.
- G. Facilitates planning objectives of other federal, state, or local agencies and Indian tribes.

The ELGA Project Area is an area where the objective is to rearrange ownership patterns to benefit both public and private interest. The parcel is currently surrounded on three sides by private land and is not needed for any type of special management. The public interest is served better by conveying this land for use as a school than to continue to be an isolated parcel of Federally owned land.

Permits and Coordination

Upon conveyance of the land from the Forest to WCSD, development of the school campus will require approvals and/or permits by other federal, state, and local jurisdictions. The permitting process will allow for additional public review and comment. However, no regulatory permits are required as part of the Forest's decision to convey land to WCSD.

Proposed Action and Alternatives

Alternative A: Proposed Action

Under the Proposed Action the Forest would convey the subject parcel to WCSD under authority of the ELGA. The parcel is approximately 60 acres and is of sufficient size for development as a school campus. WCSD has selected this 60-acre property due to proximity to the Double Diamond and Bella Vista suburbs, which have experienced recent rapid residential growth and to specifically relieve overcrowding at the Depoali and Pine middle schools that are currently over their design capacities.

Though the Forest is making no decision on what type of development will occur on the parcel, the NEPA requires that foreseeable future actions are disclosed and considered. This proposed action would enable future development of one or more schools on the conveyed parcel, and therefore will consider the effects of the future development on the parcel in this analysis. The best-known future development is described here, for analysis purposes, but development is not part of the proposed action.

The WCSD has filed a preliminary Plan of Development for a school campus that would benefit the public interest and meet the specific requirements established in ELGA (114 Stat. 368; 16 U.S.C. 479a). The decision to be made by the Forest is whether or not to convey the 60-acre parcel meeting the criteria of the ELGA to WCSD and whether further environmental documentation in an environmental impact statement is needed. WCSD will be solely responsible for development of the proposed school campus.

Once conveyed to WCSD, the District proposes to construct the Arrowcreek school campus in compliance with applicable Washoe County codes, regulations, and standards. Conceptual development plans have been submitted to the Forest for consideration and demonstration of compliance with the ELGA requirements. The final design and engineering of the middle school will be completed by WCSD in 2018 and is subject to change; however, the conceptual development plans are included in the EA for analysis of potential environmental effects. If the land is not developed in conformance with the use for which the lands were conveyed, title of the lands will revert to the U.S. Forest Service.

Phase 1 of the campus development addresses WCSD's immediate need for a new middle school and sports fields. Phase 1 of the proposed campus is planned for design in 2018 following completion of site specific traffic, geotechnical, and drainage studies and detailed survey of existing easements and utilities. Construction is anticipated to begin in 2019 and the school would be operational in 2021. Design of the middle school would be adapted from the existing WCSD Depoali Middle School. The elements of the middle school generally remain the same, but the footprint for the school and access roads will be modified to best fit the Arrowcreek site. Final design plans for middle school will incorporate County design standards to reduce impacts from noise and lighting and minimize traffic congestion. The 60-acre campus will be fenced along the parcel boundaries and mowed fire-breaks will be maintained along the fence line.

Phases 2 and 3 of the school campus would be determined based on the anticipated future needs of WCSD and may include development outdoor educational classroom and trails associated with the middle school and a specialized high school. Detailed plans will be developed by WCSD post conveyance and will require review and approval by Washoe County Community Development for consistency with Washoe County codes, regulations, and standards.

Figure 3. Conceptual Three-phase Plan of Development

Alternative B: No Action Alternative

Under the No Action Alternative, the USFS would deny the application and conveyance of the Forest lands to WCSD would not occur. The parcel would remain in federal ownership and administered by the Forest Service under current management direction. Under this alternative, the public land would remain available for disposal through the ELGA or other forms of disposition as may be allowed by law on National Forest System lands.

Alternatives Considered and But Eliminated from Detailed Analysis

Site Alternatives

The purpose of the ELGA is to convey Forest lands to public school districts for educational purposes at a nominal cost. The parcel proposed for conveyance to the WCSD meets the size, ingress and egress, utility availability and locational needs of the WCSD. Alternative site analysis was completed by the WCSD and with the help of the Forest Service staff before filing the initial ELGA application in 2004. Based on this assessment, there are no other 40 to 60-acre Forest system parcels currently available for disposal by the Forest under the LRMP that also meet the size, location, and logistical requirements needed for WCSD needs. Additionally, as no significant environmental effects to resources were identified on the subject parcel, it was determined that analysis of other sites would not substantially avoid or lessen environmental affects but serve to move them to another location.

The original ELGA application in 2004 requested 90 acres for development of the school campus and included the northwest 30-acre portion of the parcel. This was reduced in 2017 to 60 acres in order to avoid impacts to potentially sensitive resources and meet the WCSD's needs for a school campus.

Other Federally owned properties that were considered for a school campus include several parcels within in T18N-R19E, Sections 25 and 26. These sites have substantially more topographic relief (ie. hilly terrain) and range in size from 2 to 25 acres and are, therefore, too small for a school campus or middle school use, which typically needs at least 25-acres of flat topography. Additionally, reducing the size of the requested land beyond 40 to 60-acres would eliminate the WCSD's flexibility for future development of needed educational facilities and constrain the design alternatives for the proposed middle school that may allow for incorporation of design features to minimize traffic and noise affects. Reducing the requested acreage would not meet the WCSD's purpose and need for the project and is not carried forward as an alternative for detailed analysis.

Based on public scoping comments, WCSD also reconsidered the use of Forest System lands located along the south side of Mount Rose Highway (Section 36 T 18N, R19 E) as potential alternative locations for the school campus. As these parcels are part of a consolidated block of Forest System lands (reference Figure 2), the LRMP directives state they are not typically available for adjustments (LRMP page IV-54).

Project Alternatives

Phases 2 and 3 of the Arrowcreek School Campus would be designed at a later date by WCSD based on determination of long-term facility needs; however, the original conceptual plan for Phase 2 showed a potential pre-kindergarten facility. Based on the concerns expressed by the public during the scoping period, WCSD has modified the Phase 2 conceptual plan to remove the proposed pre-kindergarten facility and proposes to use the 6.46-acre parcel site as an outdoor educational class room facility with trails that will enhance the educational opportunities of the Arrow Creek Middle School.

Environmental Impacts of the Proposed Action and Alternatives

This section summarizes the potential impacts of the proposed action and no action alternative for each impacted resource. Resources that were not impacted, and therefore, not further analyzed include: Wilderness Areas, Riparian Areas, Minerals, Timber, Fire and Fuels.

The NEPA defines these impacts as:

- Direct impacts are those caused by an action and occur at the same time and place as the action. For the purposes of this EA, direct impacts to resources are considered those impacts caused by the conveyance from USFS to WCSD pursuant to the ELGA.
- Indirect impacts are caused by the action and occur after the project completion and/or may affect resources within or away from the project site, but are still reasonably foreseeable.
- Cumulative impacts are the effects on the environment that result from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions. Cumulative impacts may result from individually minor but collectively significant actions taking place over a period of time.

For ease in reading, the discussion of environmental consequences is organized by resource area and presented in the following order:

1. Heritage Resources
2. Traffic and Transportation
3. Biological Resources
4. Public Access and Recreation
5. Soil and Water Resources
6. Air quality
7. Noise
8. Socioeconomics and Environmental Justice
9. Visual Resources
10. Land Use

Heritage Resources

The ELGA Project Area roughly defines a border between Paiute lands to the east and Washoe territory to the west and was used extensively by both tribes prior to the immigration of non-Native American people into the Truckee Meadows. The non-native history of the general project vicinity is largely associated with Comstock era logging operations along the eastern slope of the Carson Range.

A Class III cultural resource survey was completed in June 2017 and is located in the project record (Drews 2017). The survey identified seven isolated artifacts within the ELGA Project Area. A cultural report was completed and submitted to the Nevada State Historic Preservation Office (SHPO) on **DATE**, with the recommended determination of no adverse effects to historic properties resulting from the conveyance of the parcel and subsequent construction of the school. The SHPO concurred with the Forest determination on **DATE**. The seven isolated artifacts identified within the ELGA Project Area were evaluated and determined not to meet National

Register eligibility requirements and are not considered historic properties. No architectural resources are present within the direct or indirect Area of Potential Effect (APE).

Tribal consultation with the Washoe Tribe of California and Nevada and the Reno Sparks Indian Colony began in the fall 2017 and will continue through completion of the project. WCSD is also coordinating with the Tribes and SHPO to identify and avoid impacts to cultural resources, and commits to additional mitigation measures as specified by the Tribes and SHPO to avoid impacts. These mitigation measures may include pre-construction subsurface surveys, construction monitoring, and resource documentation.

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect and Cumulative Effects

Given the absence of properties eligible for the National Register of Historic Places and the absence of American Indian traditional properties or sacred sites, a decision to convey the land to WCSD and foreseeable development of the school campus would have no direct, indirect, or cumulative effects upon heritage resources.

No Action Alternative

Direct, Indirect and Cumulative Effects

Given the absence of properties eligible for the National Register of Historic Places and the absence of American Indian traditional properties or sacred sites, a decision to deny the application for conveyance of the ELGA Project Area to WCSD would have no direct, indirect, or cumulative effects upon heritage resources.

Traffic and Transportation

The ELGA Project Area is bounded by Arrowcreek Parkway, a four-lane divided road, to the south and Crossbow Court, a two-lane roadway, to the west. Thomas Creek Road, a two-lane roadway, transects the eastern portion of the site, separating a 6.46 acre parcel from the rest of the ELGA Project Area. All three roads are Washoe County maintained roadways.

Local traffic is generated primarily by residents of the surrounding subdivisions, and roads serve as feeders and thoroughfares to other highways such as Mount Rose, US Highway 395 and Interstate 580. Traffic is also influenced by traffic associated with the two existing elementary schools located on Crossbow Court.

In 2008, the HTNF Carson Ranger district published a motor vehicle use map that identifies the roads, trails and areas designated for motor vehicle use and other public roads on Forest system lands (MVUM 2008). There are no designated roads within the ELGA Project Area. Based on field reconnaissance conducted in May 2017, there was no visual evidence of off-highway vehicle use within the ELGA Project Area.

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect and Cumulative Effects

Under the Proposed Action Alternative, the conveyance of land would have no direct effect on traffic or transportation.

The Proposed Action Alternative would result in indirect effects to traffic during construction and through long-term operation of the school campus. Construction activities would cause an increase in traffic on adjacent roadways, which could include an increase in large construction related vehicles that may cause temporary traffic delays. These impacts would be short-term and minimized through appropriate traffic management plans.

Long-term operation of the campus would be expected to generate an increase in traffic to and from the school facilities with peak traffic corresponding to the start and end of the school day. Special school events occurring after normal school hours are also likely to have periodic, temporary negative effects on traffic. In Washoe County, the start and end of school days are different for middle schools and elementary schools in order to reduce traffic delays. WCSD middle schools typically operate from 7:30 am to 2:00 pm, while Hunsberger elementary school (located across Crossbow Ct road) starts at 9:30 am and ends at 3:30 p.m. Sage Ridge School, a private academy located adjacent to Hunsberger elementary, operates from 8:05 am to 3:15 pm. Additionally, speed limits would likely be reduced to 15 mph within a designated school zone along Arrowcreek Parkway and Thomas Creek Road. The entities most affected by the changes in traffic are the adjacent and near adjacent landowners.

As part of the final project planning, WCSD will complete a traffic study and capacity analysis to determine the existing level of service (LOS) of the surrounding roads. The traffic study will include recommendations to mitigate the anticipated traffic impacts and maintain the existing LOS to the extent practicable. Traffic mitigation measures may include recommendations for installation of new traffic controls, lengthening of turn lanes, increased signage, lane widening or addition of new lanes. The traffic study will be used to determine the most efficient means of ingress and egress to reduce traffic delays. WCSD will adhere to the recommendations within project specific traffic study to mitigate impacts to traffic, including periodic post-project monitoring of traffic and intersection capacity. Final traffic plans will adhere to Washoe County and Nevada Department of Transportation regulatory requirements, and, if appropriate, the Regional Transportation Commission's *Regional Transportation Improvement Program*.

WCSD operates 60 elementary schools, 14 middle schools and 15 high schools within Washoe County that are located within a diversity of residential neighborhoods and with varying site specific logistical challenges, including schools within the Tahoe basin located at a much higher elevation with greater snowfall and climatic variations. WCSD is experienced in managing schools under extreme weather conditions and emergency situations, and have developed standard operating procedures for emergency evacuations, lockdowns and school cancelations and schedule delays. Post construction, WCSD would monitor traffic flow and congestion around the school campus and continue to develop best management practices for traffic in cooperation with Washoe County and other State regulatory agencies to avoid and minimize adverse effects from construction and operation of the school campus and maintain public safety.

The Proposed Action Alternative would result in indirect adverse effects to transportation in the short and long-term. However, through incorporation of BMPs, adherence to County and State

Commented [NEL-2]: Not only will pick-up drop-off traffic be a daily issue there will be reduced speed limits (school zones) on the roads near the schools. Might want to find out how those map out. (Jim)

Regulations, and on-going monitoring, adverse effects to traffic and public safety are not significant.

No Action Alternative

Direct, Indirect and Cumulative Effects

Under the No Action Alternative there would be no conveyance of land to WCSD or development of the Arrowcreek School Campus. The No Action Alternative would have no direct, indirect or cumulative effects on traffic or transportation.

Biological Resources

Vegetation

The ELGA Project Area, located on the northwest corner of Arrow Creek Parkway and Thomas Creek Road, is surrounded by residential development and roadways on all sides. Elevations range from 5,070 to 5,200 feet, and the site slopes gently from southwest to northeast at approximately five (5) percent.

The dominant vegetation within the ELGA Project Area is primarily composed of Wyoming big sagebrush (*Artemisia tridentata* var. *Wyomingensis*) with scattered antelope bitterbrush (*Purshia tridentata*) intermixed. The herbaceous layer was dominated by cheat grass (*Bromus tectorum*) along the project boundary. Other common grasses include sandberg bluegrass (*Poa secunda*), bottlebrush squirreltail (*Elymus elymoides*), and bulbous bluegrass (*Poa bulbosa*). Several species of forbs were observed scattered throughout the ELGA Project Area and included: bristly fiddleneck (*Amsinckia tessellata*), tall woolly buckwheat (*Eriogonum elatum*), slender phlox (*Microsteris gracilis*), Indian paintbrush (*Castilleja miniata*), and several species of (*Cryptantha* spp.). There is no wetland or riparian vegetation within the ELGA Project Area.

Much of the ELGA Project Area was burned by wildfire in 1981 and was later reseeded with crested wheat grass (*Agropyron cristatum*).

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect, and Cumulative Effects

Under the Proposed Action Alternative, the conveyance of land would have no direct or indirect effects on vegetation. Subsequent development of the Arrowcreek School Campus would result in indirect effects from the permanent removal of native vegetation on most portions of the ELGA Project Area. Landscaping of the school campus will be designed in accordance with Washoe County Code (article 420 110.440.20). Final plans will be reviewed and approved by Washoe County Planning and Development Division.

No Action Alternative

Direct, Indirect, and Cumulative Effects

Under the No Action Alternative, the ELGA Project Area would not be transferred to WCSD and a school campus would not be constructed. The No Action Alternative would have no direct, indirect or cumulative effects on vegetation.

Federally Listed Threatened, Endangered and Candidate Species

A review of Threatened, Endangered, Candidate, and Proposed (TECP) species with potential to occur in the ELGA Project Area was conducted using the US Fish and Wildlife Service (USFWS) online consultation program IPAC (<http://www.fws.gov/ipac/> accessed August 23, 2017) and an official species list was generated and is filed in the project record (08ENV00-2017-E-01349). The IPAC database suggested the following species may have potential to occur in or near the ELGA Project Area: Lahontan cutthroat trout (T), Cui-ui (E), North American wolverine (PT), Steamboat buckwheat (E), and Webber Ivesia (T).

Potential effects to each federally listed TECP species are analyzed in detail in the project record (Arrowcreek School Campus Biological Evaluation, 2017). That analysis concluded that none of the above listed species have potential to occur in the ELGA Project Area, and therefore, no further analysis will be conducted and no further consultation with the USFWS is required.

ENVIRONMENTAL CONSEQUENCES

Proposed Action / No Action Alternatives

Direct Effects, Indirect, and Cumulative Effects

Based on the data provided by the USFWS and evaluation of the ELGA Project Area, there is no potential for the Lahontan cutthroat trout, Cui-ui, North American wolverine, Steamboat buckwheat, and Webber Ivesia to occur within the ELGA Project Area. The Proposed Action or No Action Alternatives would not directly, indirectly, or cumulatively affect TECP Species.

Forest Sensitive Species

In accordance with Forest Service Manual 2670.32, a Biological Evaluation (BE) was prepared to analyze the potential impacts of the proposed project on Forest Sensitive wildlife and plant species which are known to occur or have potential habitat in the ELGA Project Area. Reference the Arrowcreek School Campus BE (2017) located in the project record. Based on the findings in the BE, it was determined that there are no Forest Service Sensitive plant or wildlife species that have potential habitat within the ELGA Project Area or are known to occur within the ELGA Project Area.

ENVIRONMENTAL CONSEQUENCES

Proposed Action / No Action Alternatives

Direct Effects, Indirect, and Cumulative Effects

Based on the analysis conducted in the Arrowcreek School Campus BE, there is no potential for any Forest Service Sensitive plant or wildlife species to occur within the ELGA Project Area. The Proposed Action and No Action Alternatives would not directly, indirectly, or cumulatively affect Forest Service Sensitive species.

Management Indicator Species and Other Species of Concern

Management indicator species (MIS) are identified in the Toiyabe National Forest Land and Resource Management Plan as representing a group of species having similar habitat requirements. MIS are not federally listed as threatened, endangered, or Forest Sensitive but have the potential to be affected by project activities. A review was conducted to determine: 1) if the

project is within the range of any MIS, 2) if habitat is present within the proposed ELGA Project Area, and 3) if there are potential direct, indirect or cumulative effects on habitat components. MIS associated with habitats that may be affected by the project will be analyzed below.

The following MIS were selected for detail analysis for this project:

- Mule deer

Other Species of Concern:

- Golden eagle
- Migratory birds
- Carson Valley monkeyflower (*Erythranthe carsonensis*)
- Mount Rose Monkeyflower (*Mimulus diplacus*)

Mule Deer

The ELGA Project Area is in the NDOW Game Management Unit 194, which is occupied by the Carson Range and Peavine Mountain Interstate Herd. A 2016-2017 status report prepared by NDOW for this herd stated that short-term population trends appear stable around 1,700 mule deer, but the overall trend for this herd is declining (Cox et al 2017). The ELGA Project Area contains favorable mule deer habitat with mixed sage, other brush and perennial grass species as well as desired browse species such as Antelope bitterbrush. In the past, the ELGA Project Area would have served as critical winter habitat, complimentary to critical summer/fawning range in the higher elevation Mt. Rose area. However due to extensive development around the ELGA Project Area and associated human activity, generally east of Timberline Road, NDOW no longer considers this area as “critical habitat” due to both its small size, isolated nature and surrounding habitat fragmentation (Lackey 2017, NDOW 2017).

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct Effects, Indirect, and Cumulative Effects

The Proposed Action Alternative would result in no direct impacts to mule deer from land conveyance. Indirect and cumulative effects would result from the foreseeable development of the Arrowcreek School Campus by Washoe County School District (WCSD). Site development would eliminate approximately 60 acres of suitable mule deer habitat. Because the ELGA Project Area is already surrounded by development, small in size, and isolated from other areas of suitable habitat, it is not considered critical habitat and effects to mule deer from the Proposed Action would be minimal. The proposed project would have only minor effects to mule deer habitat and not cause a downward trend in the population or loss of viability for mule deer.

No Action Alternative

Direct Effects, Indirect, and Cumulative Effects

Under the No Action Alternative, management directives would stay the same and use of the ELGA Project Area by mule deer would not change. The No Action Alternative would result in no direct, indirect, or cumulative effects to mule deer.

Golden Eagle

Golden eagle can be found throughout the western United States. They are distributed across Nevada year-round with seasonal shifts in home ranges, densities and activity patterns (GBBO 2010 and NDOW 2012). Golden eagles are a protected species under the Bald and Golden Eagle Protection Act, considered a Bird of Conservation Priority by the USFWS and a Species of Conservation Priority by NDOW. The golden eagle population in Nevada is estimated to range between 2,400 and 3,000. Historic population trends reflect substantial declines with recent trends suggesting possible declines, a trend that is inconclusive in Nevada (GBBO 2010 and NDOW 2012).

Key habitat generally includes a variety of habitat types located in open to semi-open landscapes that contain an adequate prey base of small mammals, particularly rabbits, marmots and ground squirrels. Golden eagles tend to avoid heavily forested, large agricultural and urban areas and nest primarily on rock ledges associated with cliff habitat, although they will nest in large trees on occasion (GBBO 2010 and NDOW 2012). Densities tend to be highest in shrub-steppe habitats consisting of a mosaic of open habitat supporting a robust prey base in proximity to suitable nest sites (GBBO 2010).

The ELGA Project Area contains habitat that support favorable prey base including rabbits and ground squirrels; however, the ELGA Project Area is much smaller than the 60,000 acre minimum patch size identified by the GBBO (2010) and is located amongst urban development, which eagles tend to avoid. While no nesting habitat is located on or immediately adjacent to the ELGA Project Area, NDOW has documented two eagle nests within 10-miles of the ELGA Project Area with one of the two being active as recently as May of 2011 (NDOW 2017).

Proposed Action Alternative

Direct Effects, Indirect, and Cumulative Effects

The Proposed Action Alternative of land conveyance would have no direct effects to golden eagles. Foreseeable development of the Arrowcreek School Campus by WCSD may result in minor indirect and cumulative effects due to the loss of 60 acres of suitable hunting habitat for golden eagles in an area where previous development has already eliminated most suitable habitat. However, because of the site's small size and isolation from other large tracks of open space, the site would only rarely be used by golden eagles and development of the site would have little impact. Based on the above assessment, the proposed project would have only minor effects and not cause a downward trend in the population or loss of viability for golden eagles.

No Action Alternative

Direct Effects, Indirect, and Cumulative Effects

The No Action Alternative would have no direct, indirect, or cumulative effects to golden eagles. Current management practices and use would continue, and the site would remain with minimal habitat values for golden eagles.

Migratory Birds

Roughly 350 species of migratory birds can be found in North America and can be found in virtually every habitat on the continent. Typically, more than half of the birds in any sampling area are migratory (Robinson 1997). For the purposes of this assessment, effects will focus on migratory birds associated with sagebrush habitat as identified in the Nevada Partners in Flight

(NPIF). Migratory birds can be found in all types of vegetative communities. The natural vegetative community in the ELGA Project Area tracts consists of a fairly homogeneous sagebrush and bitterbrush community.

The below table identifies the focal species for sagebrush and if they are considered a priority species in the State of Nevada (Neel 1999) and recent trend information for the State of Nevada (Sauer et al 2007).

Table 3. Focal and priority species identified by NPIF for sagebrush communities.

Species Common Name	NPIF Priority Species	BBS Population Trend Information for Nevada Populations	Potential to in Arrowcreek Project Area
Gray Flycatcher	X	Stable	
Prairie Falcon	X	Stable	X
Sage Thrasher	X	Stable/Slight Decline	
Green-Tailed Towhee		Stable/Slight Decline	
Spotted Towhee		Stable/Slight Decline	
Brewer's Sparrow		Stable/Slight Decline	X
Vespers Sparrow	X	Stable/Slight Decline	
Sage Sparrow	X	Stable	X
Lark Sparrow		Stable	
Western Meadowlark		Stable	X
Loggerhead Shrike	X	Stable	X
Sage Grouse	X	Stable	
Western Scrub Jay		Stable	X

Proposed Action Alternative

Direct Effects, Indirect, and Cumulative Effects

Under the Proposed Action Alternative there would be no direct effects to migratory birds from conveyance of land.

Indirect effects would occur from subsequent development of the Arrowcreek School Campus by WCSD. Indirect effects from construction related activities include loss of nesting and foraging habitat within 60 acres of sagebrush scrub. The foreseeable future development would contribute to the urbanization of the area that would negatively influence bird density, species diversity, and distribution. However, the ELGA Project Area is currently surrounded by development and is isolated from other Forest system lands. The quantity and quality of suitable habitat is low and effects to migratory birds would be minimal. Based on the above assessment, individual migratory birds may be temporarily displaced or otherwise affected; however, the proposed project will not cause a downward trend in the population of any migratory bird species or loss of viability.

No Action Alternative

Direct Effects, Indirect, and Cumulative Effects

The No Action Alternative would have no direct, indirect, or cumulative effects to migratory birds.

Mount Rose Monkeyflower (NNNPS: Threatened, NV: recommended for full protection)

The Mt. Rose Monkey flower is an annual herb endemic to Washoe County, Nevada. A rare plant survey was conducted in early May 2017 in the ELGA Project Area. The timing of the survey coincides with the blooming period for all of the special interest plant species that were determined to have potential habitat within the ELGA Project Area. The survey resulted in no detections of Mt. Rose monkeyflower within the ELGA Project Area.

Proposed Action / No Action Alternatives

Direct Effects, Indirect, and Cumulative Effects

Based on the results of the rare plant survey, it is unlikely that Mt. Rose monkeyflower is present within the ELGA Project Area, and the Proposed Action and No Action alternatives would not likely have any direct, indirect or cumulative effects.

Carson Valley Monkeyflower

Carson Valley monkeyflower is known from Carson City, Douglas, and Washoe counties. This species is listed as Threatened by the Nevada Native Plant Society and recommended for full protection by the State of Nevada.

Carson Valley monkeyflower is found in open areas of Great Basin sagebrush/bitterbrush scrub in coarse granite soils on gentle to moderate slopes (0-15%) between 1400 m to 1580 m (4600 ft – 5200 ft.). The species usually is found on north facing aspects but also occasionally on south-southwest aspects.

Proposed Action / No Action Alternatives

Direct Effects, Indirect, and Cumulative Effects

Based on the results of the rare plant survey, it is unlikely that Carson Valley monkeyflower is present within the ELGA Project Area, and the Proposed Action and No Action alternatives would not likely have any direct, indirect or cumulative effects.

Noxious and Invasive Species

Noxious weeds are addressed by Executive Order 13112, which directs Federal agencies to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species can cause. The Executive Order further specifies that Federal agencies shall not authorize, fund, or carry out actions likely to cause or promote the introduction or spread of invasive species.

The Nevada Revised Statutes (NRS 555.130) defines a noxious weed as “any species of plant which is, or likely to be detrimental or destructive and difficult to control or eradicate.”

The Forest Service Manual (USDA Forest Service 1998) defines noxious weeds as:

Those plant species designated as noxious weeds by Federal or State law. Noxious weeds generally possess one or more of the following characteristics: aggressive and difficult to manage, poisonous, toxic, parasitic, a carrier or host of serious insects or disease, and generally non-native.

No noxious weeds per the State or Federal Noxious Weed List (NDA 2017) were observed in the ELGA Project Area during field surveys in May 2017. Invasive non-native species present include cheatgrass (*Bromus tectorum*), tumble mustard (*Sisymbrium altissimum*), and western tansy mustard (*Descurainia pinnata*).

Proposed Action Alternative

Direct Effects, Indirect, and Cumulative Effects

There are no direct impacts from the conveyance of the ELGA Project Area to the WCSD.

Construction of the school campus could introduce non-native and invasive weeds into the area through equipment and seeding. The introduction and spread of non-native and invasive species could be reduced through cleaning of construction vehicles and equipment prior to the start of construction. Once the site is developed and with associated landscaping, the presence and potential spread of undesirable non-native species would likely be reduced.

No Action Alternative

Direct Effects, Indirect, and Cumulative Effects

Under the No Action Alternative, the ELGA Project Area would continue to be managed under current forest plan direction and no new effects from invasive and non-native species would occur.

Public Access and Recreation

The ELGA Project Area is surrounded by private lands on all sides and is isolated from all other forest lands. There are no designated or managed recreational uses within the ELGA Project Area. The area is available for casual recreation uses. Based on site reconnaissance and public comments the site appears to be used by adjacent landowners for hiking and dog walking. No trails or evidence of OHV recreational activities were evident.

Public access is available from most sides of the ELGA Project Area except where the project area abuts residential property in the northeast corner. There are no Forest Service designated access points or parking area.

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect, and Cumulative Effects

Under the Proposed Action Alternative, jurisdiction over the 60-acre ELGA Project Area would be conveyed to the WCSD for future development of a school campus. The school campus would be fenced along its perimeter and casual recreational uses would no longer be allowed. The northern most 30 acres of the parcel would remain under Forest Service jurisdiction and open to public use.

The recreational opportunities in the ELGA Project Area would change when the school is completed from the dispersed uses to recreational uses typical of a school campus such as organized sports. Specific facilities appropriate for each sport would be constructed. These facilities would not be open to the general public but would be specific for the students.

No Action Alternative

Direct, Indirect and Cumulative Effects

Under the No Action Alternative, there would be no direct, indirect or cumulative effects to the current recreational uses within the ELGA Project Area.

Soil and Water Resources

The ELGA Project Area is located on a relatively flat parcel sloping gently (< 5%) from southwest to northeast with elevations range from 5,070 to 5,200 feet. The ELGA Project Area is surrounded by single family residential development and roadways on all sides.

The site soils are mapped by the USDA Natural Resource Conservation Service web soil survey as: 1) Leviathan extremely stony sandy loam, and 2) Oest extremely stony sandy loam. Site soils are characterized as well drained, extremely stony sandy loam over sandy clay loam originating from mixed alluvium and located on fan remnants (NRCS 2017).

The ELGA Project Area receives on average of 8 to 12 inches of precipitation per year. There are no perennial streams or other permanent surface waters, wetlands, springs or seeps in the ELGA Project Area. Two small ephemeral drainages flow from south to north across the ELGA Project Area and appear to be dry for most of the year. Hydrology within the drainages originates primarily from stormwater runoff associated with Arrowcreek Parkway and the development west of Crossbow Court that is captured in a roadside ditch and culverted onto the ELGA Project Area. The washes flow together and then northeast across the site draining into the storm drain system associated with the neighboring residential development to the northeast. Thomas Creek is located approximately 0.2 west of the western parcel boundary. The ELGA Project Area is not located within the 100-year floodplain of Thomas Creek and is mapped by FEMA as an area of minimal flood hazard (Zone X) (FEMA 2017).

The Cities of Reno and Sparks, and areas of Washoe County are located within the Truckee Meadows, have been issued a permit (NVS000001) under the federal National Pollution and Discharge Elimination System for the discharge of stormwater into waters of the United States under the MS4s program. The entities are required to design their systems to:

- Satisfy the appropriate water quality requirements of the Clean Water Act;
- Protect water quality; and,
- Reduce the discharge of pollutants to the Maximum Extent Practicable (MEP).

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect and Cumulative Effects

Under the Proposed Action Alternative, conveyance of land from the Forest to WCSD would not result in any direct effects to surface and groundwater resources or water quality.

Indirect effects to water quality would occur from the foreseeable development of the Arrowcreek School Campus and required site grading. Surface drainage patterns would be permanently altered by construction of the school facilities and roads. The potential for soil erosion and surface runoff would increase from removal of vegetation, creation of impermeable surfaces, and altered drainage patterns. This potential would be reduced by implementation of construction best management practices (BMPs) and monitoring required by the Nevada NPDES permit (NV NVS000001). In accordance with the permit requirements, the contractor must install construction site BMPs for temporary disturbances as well as Post- Construction (permanent) BMPs. A permanent stormwater conveyance system will be included in final site design and reviewed and approved by the County. These temporary and permanent BMPs are required to treat stormwater runoff from the site and to protect surface and ground water quality. With implementation of temporary and permanent BMPs, short-term and long-term adverse impacts to water resources, including water quality, would be minimal.

No Action Alternative

Direct, Indirect and Cumulative Effects

Under the No Action Alternative there would be no conveyance of land or development of the Arrowcreek School Campus, and the ELGA Project Area would remain under current management and subject to the current uses and disturbance regimes. There would be no new effects to soils and water resources from the No Action Alternative.

Air Quality

Air quality within Washoe County is regulated by the District Board of Health acting through the District Health Officer. The District Health Department is assigned as the air pollution control regulatory agency of Washoe County (NRS Chapter 445). The mission of the Washoe County Health District-Air Quality Management Division (AQMD) is to monitor and assure the scientific accuracy of the ambient air quality data collected for the determination of compliance with the National Ambient Air Quality Standards (NAAQS).

Based on the Washoe County Health District AQMD monitoring data, Washoe County has been designated as being in non-attainment for PM10, O3, and CO as it exceeds the health and welfare based NAAQS. Due to this designation, Washoe County was required to prepare and implement a State Implementation Plan (SIP). The SIP identifies and quantifies sources of emissions and presents a comprehensive strategy to control and reduce locally generated emissions.

The SIP used projections contained in the Truckee Meadows Regional Plan population projections to 2030. EPA models were used to estimate emissions based on the population projections. A Maintenance Plan and a Monitoring Plan are included in the SIP to maintain compliance with the PM10, O3 and CO NAAQS.

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect, and Cumulative Effects

Under the Proposed Action Alternative, there would be no direct impacts to Air Quality from the conveyance of land to the WCSD.

Indirect effects would result from the foreseeable development of the Arrowcreek School Campus. Temporary impacts to air quality may occur during construction of the school campus. Site development would require grading for which the WCSD's construction contractor would be required to obtain a Dust Control Permit from the Washoe County AQMD. The permit conditions require implementation of a dust control plan 24-hours a day, 7-days a week including weekends and holidays until project completion. Implementation of the AQMD Dust Control permit would ensure impacts to existing air quality are minimized and would not contribute to further exceedances of the NAAQS during construction.

Indirect impacts may also occur from locally increased traffic with increased emissions centered on the ELGA Project Area. However, overall vehicle emissions may be reduced within the air basin as the distance students commute to school is likely to decrease with construction of the Arrowcreek School Campus. Increased traffic and growth is accounted for in the Washoe County SIP because the SIP used the growth projections provided in the Truckee Meadows Regional Plan, which included an increase in schools with the population. The SIP includes maintenance and monitoring actions to prevent further exceedances of the NAAQS.

No Action Alternative

Direct, Indirect and Cumulative Effects

Under the No Action Alternative, there would be no conveyance of land and no construction of a school campus; therefore, the No Action Alternative would have no direct, indirect or cumulative effects to air quality or contribute to a change in the basin's NAAQS attainment status.

Noise and Lighting

The level of noise within the area changes over the course of a day, and noise levels are typically controlled by the activities occurring within and adjacent to an area. Typically, noise levels within the ELGA Project Area are low as there is no development within the project area to generate persistent sound, and the primary source of noise is from vehicular traffic along Arrowcreek Pkwy and Thomas Creek Rd.

Sources of construction noise in the vicinity of sensitive receptors are a common factor used to determine whether projects result in significant noise impacts. Examples of sensitive receptors include: healthcare facilities, schools, parks and playgrounds. Hunsberger Elementary School and the Sage Ridge School lies just west of the subject parcel and single-family residential development surrounds all but the northwestern parcel boundary.

There are currently no sources of light generated within the ELGA Project Area.

Regulations governing noise and light levels are generally guided by local ordinances and polices. Washoe County addresses noise and light associated with the operation of public schools through the Washoe County Noise and Lighting Standards (Washoe County Development Code, Division Four – Development Standards, Section 110.414.05) which restricts the hours of operation and requires design features to minimize and mitigate impacts caused by noise and light.

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect and Cumulative Effects

Under the Proposed Action Alternative, there would be no direct effects to noise from conveyance of the land from the Forest Service to WCSD.

Indirect effects from noise would occur during short-term construction of the Arrowcreek School Campus and long-term operation of the campus. The entities most affected by these actions are the adjacent landowners. During construction of the school campus there would be temporary or periodic increases in noise that are above existing levels. To avoid and minimize adverse effects to adjacent residences and schools, construction activities would be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Saturday per the Washoe County Noise and Lighting Standards (Washoe County Development Code, Division Four – Development Standards, Section 110.414.05). No construction would occur on Sunday or Federal holidays.

Long-term operation of a school campus would introduce new and elevated noise in association with school bells, playground activities, sports activities, and from increased traffic at the start and release of school days. These sources of noise would be limited to the school's hours of operation which are between 7:00 am and 3:30 pm Monday through Friday. Additionally, the school would be designed to meet the Washoe County development standards (Washoe County Development Codes, 2015) for ordinary uses:

For property being developed with a group care facility, school or hospital: sixty (60) Ldn at three (3) feet from any of the building's exterior walls. Interior noise levels shall not exceed 45 Ldn.

Hallway corridors would be designed interior to the school per the County Code. Extracurricular activities that would result in elevated noise levels outside of normal school operations would be authorized under a Special Use Permit from the County.

Site development would affect nighttime lighting. There would be nighttime security lighting at some exterior doorways, and the parking areas would be lit with shielded, down-facing lights. All outside night lighting would be designed in conformance with County Code Section 110.414.21. The code requires that all light sources be located and installed in such a way as to prevent spillover lighting onto adjoining properties. This is achieved by designing lights to reflect away from adjoining properties, installing covers on all lighting fixtures, and restricting the height of lights to twelve feet when adjacent to residential neighborhoods. County code also requires the use of timers, window blinds and other acceptable means to control lighting at night from interior lights of the school.

The school would be used for some evening events such as band performances, sporting events, and potentially for community meetings, but these would not typically extend beyond 9:00 or 10:00 pm. Outdoor fields would not be lit and would not be used at night.

Based on compliance with required county codes, indirect negative impacts from increased noise and lighting are not significant.

No Action Alternative

Direct, Indirect, and Cumulative Effects

Under the No Action Alternative, the current noise in the ELGA Project Area would continue and there would be no direct, indirect or cumulative effects.

Socioeconomics and Environmental Justice

Executive Order 12898, dated February 11, 1994, requires all Federal agencies to consider the effects of their actions on minority and low-income communities, especially if adverse effects to the environment or human health conditions are identified. This required analysis is often referred to as Environmental Justice. Key indicators reviewed for environmental justice include minority populations, poverty rates, and income within a community. These factors are assessed to ascertain whether there are disproportionate affects to minority or low-income communities.

Based on available demographic information in the 2010 U.S. Census, the area involved in this analysis includes Reno city Census Designated Population (CDP), Washoe County and the State of Nevada.

The following table presents current information on selected demographic characteristics within Reno CDP, and Washoe County and provides a comparison of these variables against those reported for the State. This information indicates that approximately 74.2 of the Reno CDP population is white, which is eight percent higher than is estimated for the State, but similar to the rest of Washoe County (76.9%). The population of Hispanics or Latinos in the Reno CDP is approximately 24.3%, which is similar the County and State averages of 22.5% and 26.5%, respectively.

Table 1. Select Demographic Characteristics.

Selected Demographic Characteristics	Reno Southwest*	Reno	Washoe County	State of Nevada
Population, 2010 estimates	53,634	245,255	421,407	2,700,691
White persons not Hispanic, percent, 2010	88.2	74.2%	76.9%	66.2%
Hispanic or Latino, percent, 2010	8.5	24.3%	22.2	26.5%
African Americans, percent, 2010	1.3	2.9%	2.3%	8.1%
American Indian and Alaska Native persons, percent, 2010	1.3	1.3%	1.7%	1.2%
Asian persons, percent, 2010		6.3%	5.2%	7.2%
Native Hawaiian and Other Pacific Islander, percent, 2010		0.7%	0.6%	0.6%
Two or more races, percent, 2010	2.4	4.2%	3.8%	4.7%
Homeownership rate, 2000		46.4%	56.8%	55.1%
Median household income (in 2015 dollars), 2011-2015	57,056	\$47,012	\$52,870	\$51,847
Median household income, percent of State MHHI, 2015		91%	102%	100%
Persons below poverty level, percent, 2010		18.3%	13.8%	14.7%

*Data from City-data.com for year 2000. All other data based on 2010 census.

As illustrated in the table above, the median household income (MHHI) in the Reno CDP is \$47,012, which is approximately 91% of the State MHHI and 83% of the County MHHI. The percentage of persons falling below federally defined poverty levels within the State is estimated at an average 14.7%. Reno CDP exceeds the estimated State average poverty levels at 18.3%.

The year 2000 median household incomes in southwest Reno are higher than those of the City, County and State that were reported for 2011-2015 and population is predominately white (88.2%). There are no minority or low-income communities in southwest Reno.

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect and Cumulative Effects

Conveyance of land under the Proposed Action Alternative would not result in direct effects to the local economy or disproportionately impact minority populations, low income communities, or Tribes.

Construction and long-term operation of the Arrowcreek School Campus would likely have both indirect socioeconomic benefits and adverse effects to the community.

Conveyance of the land under the ELGA and development of the school campus would indirectly benefit southwest Reno area by eliminating or substantially reducing current or projected overcrowding for eight elementary and two middle schools. In doing so, it will also open up a

Commented [NEL-3]: You have this table showing demographics, but then there is no analysis of whether the area with the school actually has minority communities, and whether the project would affect them disproportionately. A few more sentences would be helpful here. Also, nowhere in this document did you talk about housing values. This EA needs some analysis about how the school would affect the economics of the local community. I know that isn't well known, but you need to talk about what the science says. If housing values of the houses directly adjacent to the school may suffer, we need to say that. If it will make the neighborhood have higher housing values because it is near a school, the EA needs to say that. If there isn't good data showing either way, the EA needs to discuss some of the possibilities, and needs to explain what the uncertainties are.

significant number of classrooms that can be used for expansion of special education and other programs in the affected schools. Under the ELGA, purchase of the land is at a nominal cost and would save the WCSD money that could be used for other educational resources. Additionally, travel times to and from schools would be substantially reduced for some students, including travel by school bus.

Indirect economic benefits would also be realized within the surrounding southwest Reno community from monies generated and spent locally by the influx of construction workers through the purchase of materials, fuel, and other necessary commodities.

Development of the school campus could have indirect effects to property values. The effect of a school's proximity on housing value is dependent on many factors and is very site and school specific. Potential buyers are often attracted to housing in or near school zones based on easy access to school programs, decreased commute or walking times, increased police presence, and personal use of school facilities. However, property values can also be negatively affected by the elevated noise and traffic associated with a school. An analysis of home transactions in the Denver Public School District suggests that as the distance to a school increases, home price decreases. However, the study also finds a congestion effect near all levels of schooling, such that homes that are 1,000 feet from a school have a higher price than homes located within 500 feet (Metz, 2015). Specific to the proposed ELGA Project Area, the Arrowcreek School Campus may also have indirect, negative effect on property values by impeding scenic views.

No Action Alternative

Direct, Indirect and Cumulative Effects

The No Action Alternative would not affect the existing human and economic character of the region surrounding this project. Under this alternative, current socioeconomic conditions and trends would continue, and the WCSD's student enrollment would continue to increase. Failure of this project to move forward would require WCSD to purchase land at another private site at potentially higher costs. Under the No Action Alternative, construction of a new campus would be delayed, and existing schools would continue to be overcrowded. Purchase of a different school site on private lands would likely result in a higher purchase price and limit available funds for other school improvements and or construction.

Visual Resources

The ELGA Project Area is in an undeveloped, parcel with no development and minor disturbance. It is bounded by Thomas Creek Road to the east, Arrowcreek Parkway to the south, and Crossbow Court to the west. Hunsberger Elementary School lies just west of the subject parcel and single-family residential development consisting of 1 and 2-story houses surrounds all but the northwestern parcel boundary. As such, the site is viewed primarily from surrounding residences, schools and vehicle occupants driving on adjacent roadways. Views from the site include residential development in the foreground and views of the Eastern Sierras to the west in the background.

Indicators of effects on federal lands are set forth in the LRMP (USDA FS, 1986). The LRMP provides management direction for the visual resources of the Forest by establishing the degree of acceptable change to the forest landscape in terms of adopted Visual Quality Objectives (VQOs). Indicators of effects on federal lands are whether the project would achieve the adopted VQO set

forth in the Standards and Guidelines of the Forest Plan. The Forest Plan identifies five VQO levels, ranging from very little development (preservation) to highly developed (maximum modification). The ELGA Project Area is classified as Maximum Modification.

Design of the Arrowcreek Creek Campus is guided by the Washoe County Development Code and Public School Facility Design Standards (Article 440). The County design standards provide guidelines for building height, setbacks for buildings adjacent to residential uses, and landscaping. Codes emphasize consistency of design with community character. Final school design must be reviewed and approved by the Washoe County Planning and Development Division for consistency with County Code.

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect, and Cumulative Effects

Under the Proposed Action Alternative, the conveyance of land would have no direct effect on existing visual quality. The ELGA Project Area is mapped as Maximum Modification VQO which allows for strong and obvious changes that dominate the landscape. The Proposed Action Alternative is consistent with LRMP and there would be no direct impacts from conveyance of the land to WCSD.

Subsequent development of the Arrowcreek School Campus by WCSD would have indirect effects on visual quality as the proposed action would alter the on-site visual resources from a natural setting to a developed condition. Depending on final design and school layout, the proposed school facilities may impede scenic mountain views from adjacent homeowners.

Design of the proposed school campus would adhere with the County design standards for public school facilities. Indirect negative impacts to visual resources are less than significant.

No Action Alternative

Direct, Indirect and Cumulative Effects

Under the No Action Alternative there would be conveyance of land to WCSD or development of the Arrowcreek School Campus. There would be no direct, indirect or cumulative effects on visual resources.

Land Use and Zoning

Once the ELGA Project Area is conveyed to WCSD as private land, future planning and development of the land is under the jurisdiction of Washoe County guided by the Washoe County Master Plan (2010). The ELGA Project would be integrated into an area zoned as “Low Density Suburban” which typically consists of residential development of one unit per acre. Under the Washoe County Master Plan, public school facilities are allowed without discretionary review in all regulatory zones, with exception of “Industrial” and “Open Space,” subject to one or more site plan review meetings with the Washoe County Planning and Development Division (Washoe County Development Code, Division Four – Development Standards, Section 110.440.05).

There are on-site existing easement corridors for AT&T fiberoptic lines located parallel with Thomas Creek Road and along the eastern project area boundary adjacent to the homes located in Fieldcreek Ranch development. The Forest also granted a 60-foot right-of-way easement to Washoe County for Thomas Creek Road.

ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

Direct, Indirect, and Cumulative Effects

Conveyance of the ELGA Project Area to the WCSD is consistent with Toiyabe LRMP because the parcel is surrounded by non-federal land and conveyance would improve management efficiency and administration by reducing common property boundaries and facilitates the planning objectives of WCSD. The conveyance of land would benefit both public and private interests.

Conveyance of the ELGA Project Area to the WCSD for use of a school campus would be consistent with the Washoe County Master Plan (2010) and “Low Density Suburban” zoning. The conveyance of land would subject to valid existing rights and would not negatively affect existing land use authorizations. There are no indirect effects to Land Use from conveyance of the land from the Forest to WCSD under the ELGA or development of the Arrowcreek School Campus.

No Action Alternative

Under the No Action Alternative there would be no land conveyance or change in management directives; therefore, there would be no direct or indirect effects to land use or the existing land use authorizations.

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