Appendix A: Agency Coordination

(Provided on DVD attached to inside back cover)
## Appendix A
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<tr>
<th>Date/Document</th>
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<tbody>
<tr>
<td><strong>Letters of Intent to Study</strong></td>
<td></td>
</tr>
<tr>
<td>March 28, 2008 NDOT letter to list of recipients attached to letter</td>
<td>Notice of intent to study, request for comments, and agency scoping meeting invite</td>
</tr>
<tr>
<td>March 31, 2008 EPA letter to FHWA</td>
<td>Response to Federal Register Notice requesting comments, and acceptance to serve as participating agency, and scoping comments</td>
</tr>
<tr>
<td>April 8, 2008 FEMA letter to NDOT</td>
<td>Response to Letter of Intent to Study, and comments</td>
</tr>
<tr>
<td>April 16, 2008 Agency Scoping Meeting Minutes</td>
<td>Meeting minutes</td>
</tr>
<tr>
<td>April 24, 2008 Nevada Department of Wildlife letter to NDOT</td>
<td>Response to Letter of Intent to Study, and comments</td>
</tr>
<tr>
<td>April 29, 2008 Nevada Department of Administration letter to NDOT</td>
<td>Stating that the Division of State Lands and State Historic Preservation Office support the Pyramid Highway/US 395 Connector project document, per EO 12372</td>
</tr>
<tr>
<td><strong>Cooperating Agency/Participating Agency/Agency Scoping/Technical Advisory Committee (TAC)</strong></td>
<td></td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to Pyramid Lake Paiute Tribe</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to Reno-Sparks Indian Colony</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to Washoe Tribe of Nevada and California</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to BIA</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to BLM</td>
<td>Invite for participating agency, cooperating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to EPA</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to FEMA</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to Fish and Wildlife Service, Nevada Fish and Wildlife Office</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 1, 2008, FHWA letter to USACE</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 4, 2008, NDOT letter to Nevada Department of Wildlife</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
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<th>Date/Document</th>
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<tbody>
<tr>
<td>April 4, 2008, NDOT letter to SHPO</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 4, 2008, NDOT letter to Department of Conservation and Natural Resources</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 4, 2008, NDOT letter to City of Reno, Mayor</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 4, 2008, NDOT letter to Washoe County Commission</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 4, 2008, NDOT letter to City of Sparks Mayor</td>
<td>Invite for participating agency, agency scoping meeting, and TAC participation</td>
</tr>
<tr>
<td>April 8, 2008 BLM letter to FHWA</td>
<td>Accept invitation to serve as cooperating agency</td>
</tr>
<tr>
<td>April 14, 2008 Reno-Sparks Indian Colony email to FHWA</td>
<td>Accept invitation to serve as participating agency</td>
</tr>
<tr>
<td>April 18, 2008 City of Reno Letter to NDOT</td>
<td>Request to serve as participating agency</td>
</tr>
<tr>
<td>April 18, 2008 Washoe County Department of Public Works letter to RTC</td>
<td>Accept invitation to serve as participating agency</td>
</tr>
<tr>
<td>April 21, 2008 City of Sparks letter to Steven Cooke</td>
<td>Accept invitation to serve as participating agency</td>
</tr>
<tr>
<td>April 25, 2008 USFWS letter to FHWA</td>
<td>Decline to serve as participating agency, and reiterated comments made at agency scoping meeting on April 16, 2008</td>
</tr>
<tr>
<td>April 30, 2008 EPA letter to FHWA</td>
<td>Accept invitation to serve as participating agency</td>
</tr>
<tr>
<td>August 28, 2008, RTC letter to City of Sparks Public Works</td>
<td>Clarifying NDOT April 1, 2008 letter regarding role in milestone and document reviews</td>
</tr>
<tr>
<td>August 28, 2008, RTC letter to Washoe County Planning</td>
<td>Clarifying NDOT April 1, 2008 letter regarding role in milestone and document reviews</td>
</tr>
<tr>
<td>August 28, 2008, RTC letter to City of Reno Planning</td>
<td>Clarifying NDOT April 1, 2008 letter regarding role in milestone and document reviews</td>
</tr>
<tr>
<td>September 4, 2008 EPA letter to FHWA</td>
<td>Comments on purpose and need, screening methodology, and range of alternatives</td>
</tr>
<tr>
<td>September 9, 2008 City of Reno letter to RTC</td>
<td>Accept invitation to serve as participating agency and comments on purpose and need, alternatives screening, and range of alternatives</td>
</tr>
<tr>
<td>March 29, 2012 FHWA letter to BIA</td>
<td>Invitation to serve as a cooperating agency</td>
</tr>
<tr>
<td>March 29, 2012 FHWA letter to Reno-Sparks Indian Colony</td>
<td>Invitation to serve as a cooperating agency</td>
</tr>
<tr>
<td>May 1, 2012 BIA letter to FHWA</td>
<td>Accept invitation to serve as a cooperating agency</td>
</tr>
<tr>
<td>July 9, 2012 Reno-Sparks Indian Colony letter to FHWA</td>
<td>Accept invitation to serve as a cooperating agency</td>
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<table>
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<tr>
<th>Date/Document</th>
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<tbody>
<tr>
<td>March 27, 2015 FHWA letter to Reno-Sparks Indian Colony</td>
<td>Change in cooperating agency status due to elimination of impacts at Reno-Sparks Indian Colony parcel</td>
</tr>
<tr>
<td>March 27, 2015 FHWA letter to BIA</td>
<td>Change in cooperating agency status due to elimination of impacts at Reno-Sparks Indian Colony parcel</td>
</tr>
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</table>

## Section 106: Consulting Party Correspondence

<table>
<thead>
<tr>
<th>Date/Document</th>
<th>Subject</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 5, 2009 FHWA letter to SHPO</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to CLG-Contact, City of Reno, Nevada</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Community Development Director, City of Sparks, Nevada</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Director, County of Washoe</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Center for Basque Studies, University of Nevada</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Nevada Humanities-Reno Office</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Nevada State Museum</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Historic Reno Preservation Society (HRPS)</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Sparks Heritage Museum</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Desert Research Institute</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to BLM</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>September 9, 2015 FHWA letter to BLM</td>
<td>Describe new traffic data and resulting design changes under Revised Alternative 3, identification of Revised Alternative 3 as Preferred Alternative, and eligibility and effect determinations for archaeological resources.</td>
</tr>
<tr>
<td>October 14, 2015 BLM email to NDOT</td>
<td>Agreement with FHWA’s eligibility and effect determinations for all cultural resources documented on public lands managed by the BLM.</td>
</tr>
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<tr>
<th>Date/Document</th>
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<tbody>
<tr>
<td>July 5, 2017 emails between NDOT and National Park Service</td>
<td>Consultation on potential project impacts to California National Historic Trail. NPS indicated they have no concerns with proposed undertaking in regard to the trail.</td>
</tr>
<tr>
<td>August 8, 2017 NDOT letter to SHPO. Letter was copied to BLM.</td>
<td>Respond to SHPO May 18, 2017 questions and requests for clarification on APE.</td>
</tr>
<tr>
<td>October 19, 2017 NDOT letter to BLM.</td>
<td>Request for review and comment on eligibility and effect determinations.</td>
</tr>
<tr>
<td>November 15, 2017 BLM letter to NDOT</td>
<td>No comments on APE and effect determinations. Will participate in MOA to address adverse effect to one archaeological site partly located on BLM managed lands.</td>
</tr>
<tr>
<td>December 11, 2017 NDOT letter to SHPO. Letter was copied to BLM.</td>
<td>Provide information requested in SHPO’s November 17, 2017 letter, request SHPO concurrence on eligibility and effect determinations.</td>
</tr>
</tbody>
</table>

### Section 106: Tribal Coordination

<table>
<thead>
<tr>
<th>Date/Document</th>
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<tbody>
<tr>
<td>February 5, 2009 FHWA letter to Pyramid Lake Paiute Tribe Chairman</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Tribal Council Chairman, Washoe Tribe of Nevada and California</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 5, 2009 FHWA letter to Reno-Sparks Indian Colony Chairperson</td>
<td>Invite to serve as Section 106 consulting party</td>
</tr>
<tr>
<td>February 12, 2009 Form from Pyramid Lake Paiute Tribe to FHWA</td>
<td>Completed response form</td>
</tr>
<tr>
<td>January 19, 2010 meeting with Reno-Sparks Indian Colony</td>
<td>Discuss the tribe’s concerns, study alternatives, EIS process, Section 106 status, Reno-Sparks Indian Colony’s plans for parcel</td>
</tr>
<tr>
<td>September 1, 2010 FHWA letter to Pyramid Lake Paiute Tribe Chairman</td>
<td>Follow up to FHWA’s February 5, 2009 letter, requests response, provides alternatives map, and requests they inform FHWA of cultural or religious places that should be avoided.</td>
</tr>
<tr>
<td>September 1, 2010 FHWA letter to Reno-Sparks Indian Colony</td>
<td>Follow up to FHWA’s February 5, 2009 letter, requests response, provides alternatives map, and requests they inform FHWA of cultural or religious places that should be avoided.</td>
</tr>
<tr>
<td>September 1, 2010 FHWA letter to Washoe Tribe of Nevada and California</td>
<td>Follow up to FHWA’s February 5, 2009 letter, requests response, provides alternatives map, and requests they inform FHWA of cultural or religious places that should be avoided.</td>
</tr>
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<tr>
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<tbody>
<tr>
<td>June 17, 2011 meeting with Reno-Sparks Indian Colony</td>
<td>Project overview and background, EIS alternatives, effects to Reno-Sparks Indian Colony property near Eagle Canyon, economic, noise, traffic increases, opportunity for project public art or landscape theme, and Section 106</td>
</tr>
<tr>
<td>December 9, 2011 meeting with Reno-Sparks Indian Colony</td>
<td>Project update and overview, Section 106 update, EIS alternatives, BIA contact, effects to Reno-Sparks Indian Colony parcel</td>
</tr>
<tr>
<td>January 31, 2012 meeting with Reno-Sparks Indian Colony</td>
<td>Project status update, right-of-way issues, BIA involvement, economic development, and Section 106</td>
</tr>
<tr>
<td>April 26, 2012 meeting with Reno-Sparks Indian Colony</td>
<td>Project status update, Section 106, further discussion of right-of-way issues, BIA involvement, economic development</td>
</tr>
<tr>
<td>December 28, 2012</td>
<td>Memo from FHWA to Reno-Sparks Indian Colony and BIA – summary of potential impacts to the Reno-Sparks Indian Colony Property (includes email transmittal from Jacobs)</td>
</tr>
<tr>
<td>March 29, 2013 Reno-Sparks Indian Colony letter to RTC</td>
<td>Comments on January 2013 Administrative Draft EIS.</td>
</tr>
<tr>
<td>March 29, 2013 BIA letter to RTC</td>
<td>Comments on January 2013 Administrative Draft EIS.</td>
</tr>
<tr>
<td>June 19, 2013 FHWA letter to Reno-Sparks Indian Colony copied to BIA</td>
<td>Response to comments on January 2013 Administrative Draft EIS.</td>
</tr>
<tr>
<td>April 10, 2015 FHWA letter to Reno-Sparks Indian Colony</td>
<td>Transmit cultural resources report for review and input.</td>
</tr>
<tr>
<td>May 22, 2015 Reno-Sparks Indian Colony letter to FHWA</td>
<td>Agreement with eligibility recommendations for archaeological resources and recommendation to avoid the sites for their preservation and protection.</td>
</tr>
<tr>
<td>September 9, 2015 FHWA letter to SHPO. Letter was copied to Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California.</td>
<td>Describe new traffic data and resulting design changes under Revised Alternative 3, identification of Revised Alternative 3 as Preferred Alternative, and eligibility and effect determinations for archaeological resources.</td>
</tr>
<tr>
<td>September 9, 2015 FHWA letter to BLM. Letter was copied to Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California.</td>
<td>Describe new traffic data and resulting design changes under Revised Alternative 3, identification of Revised Alternative 3 as Preferred Alternative, and eligibility and effect determinations for archaeological resources.</td>
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<tbody>
<tr>
<td>April 19, 2017 NDOT letter to SHPO. Letter was copied to Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California.</td>
<td>Clarify authority under which undertaking will proceed and request concurrence on APE.</td>
</tr>
<tr>
<td>August 8, 2017 NDOT letter to SHPO. Letter was copied to Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California.</td>
<td>Respond to SHPO May 18, 2017 questions and requests for clarification on APE.</td>
</tr>
<tr>
<td>October 19, 2017 NDOT letter to BLM transmitting the October 19, 2017 NDOT letter to SHPO. Letter was copied to Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California.</td>
<td>Request review and comment of eligibility and effect determinations.</td>
</tr>
<tr>
<td>October 19, 2017 NDOT letter to SHPO. Letter was copied to Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California.</td>
<td>Address questions and requests in SHPO’s September 6, 2017 letter, request SHPO concurrence on Indirect APE and eligibility and effect determinations, and notify and request SHPO acknowledgement of Section 4(f) approach for undertaking.</td>
</tr>
<tr>
<td>December 11, 2017 NDOT letter to SHPO. Letter was copied to Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California.</td>
<td>Provide information requested in SHPO’s November 17, 2017 letter, request SHPO concurrence on eligibility and effect determinations.</td>
</tr>
</tbody>
</table>

### Section 106: SHPO Correspondence

<table>
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<tr>
<th>Date/Document</th>
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<tbody>
<tr>
<td>February 5, 2009 FHWA letter to SHPO</td>
<td>Invite to serve as historic consulting party</td>
</tr>
<tr>
<td>May 18, 2011 FHWA letter to SHPO</td>
<td>Request for concurrence on APE</td>
</tr>
<tr>
<td>September 8, 2011 FHWA letter to SHPO</td>
<td>Additional information and request for APE concurrence</td>
</tr>
<tr>
<td>October 11, 2011 SHPO letter to FHWA</td>
<td>Concurrence with APE as described in FHWA’s September 8, 2011 letter</td>
</tr>
<tr>
<td>February 28, 2012 FHWA letter to SHPO</td>
<td>Request for concurrence on findings of eligibility for architectural resources and attachments</td>
</tr>
<tr>
<td>March 28, 2012 SHPO letter to FHWA</td>
<td>Request additional information regarding findings of eligibility</td>
</tr>
<tr>
<td>August 3, 2012 FHWA letter to SHPO</td>
<td>Provide additional information requested by SHPO to concur with findings of eligibility</td>
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<tr>
<th>Date/Document</th>
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<tbody>
<tr>
<td>August 31, 2012 SHPO letter to FHWA</td>
<td>Concurrence on eligibility determinations for certain resources, recommend Old Pyramid Highway Alignment as Unevaluated, and questions about effects and APE</td>
</tr>
<tr>
<td>November 29, 2012 FHWA email to SHPO</td>
<td>Request for concurrence on Old Pyramid Highway NRHP eligibility determination</td>
</tr>
<tr>
<td>December 3, 2012 SHPO email to FHWA</td>
<td>Request additional information for Old Pyramid Highway</td>
</tr>
<tr>
<td>March 7, 2013 FHWA letter to SHPO</td>
<td>Letter providing additional information for Old Pyramid Highway and request for SHPO concurrence on eligibility determination</td>
</tr>
<tr>
<td>April 3, 2013 SHPO letter to FHWA</td>
<td>Concurrence on eligibility determination for Old Pyramid Highway, with the August 31, 2012 SHPO letter to FHWA as an attachment</td>
</tr>
<tr>
<td>September 9, 2015 FHWA letter to SHPO</td>
<td>Describe new traffic data and resulting design changes under Revised Alternative 3, identification of Revised Alternative 3 as Preferred Alternative, and eligibility and effect determinations for archaeological resources.</td>
</tr>
<tr>
<td>September 28, 2015 FHWA letter to SHPO</td>
<td>Describe new traffic data and resulting design changes under Revised Alternative 3, identification of Revised Alternative 3 as Preferred Alternative, and changes in impacts to historic architectural resources as a result of design changes, and no change in previous effect determinations.</td>
</tr>
<tr>
<td>October 14, 2015 SHPO letter to FHWA</td>
<td>Requested clarification regarding: whether FHWA is consulting under 36 CFR 800 or the Programmatic Agreement; APE consultation; additional archaeology survey information; and historic architecture evaluation under NRHP criterion D.</td>
</tr>
<tr>
<td>April 19, 2017 NDOT letter to SHPO</td>
<td>Clarify authority under which undertaking will proceed and request concurrence on APE.</td>
</tr>
<tr>
<td>May 18, 2017 SHPO letter to FHWA</td>
<td>Questions and request for clarification on APE.</td>
</tr>
<tr>
<td>June 19, 2017 FHWA letter to SHPO</td>
<td>Individual finding of No Adverse Effect for Prosser Valley Ditch.</td>
</tr>
<tr>
<td>July 18, 2017 SHPO letter to NDOT</td>
<td>Concurrence on Prosser Valley Ditch NRHP eligibility recommendations. Acknowledge that design changes will not alter ditch’s historic characteristics or further reduce its integrity.</td>
</tr>
</tbody>
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<tbody>
<tr>
<td>August 8, 2017 NDOT letter to SHPO</td>
<td>Respond to SHPO May 18, 2017 questions and requests for clarification on APE.</td>
</tr>
<tr>
<td>September 6, 2017 SHPO letter to NDOT</td>
<td>Provide concurrence with the Direct APE, and additional questions and requests regarding Indirect APE.</td>
</tr>
<tr>
<td>October 19, 2017 NDOT letter to SHPO</td>
<td>Address questions and requests in SHPO’s September 6, 2017 letter, request SHPO concurrence on Indirect APE and eligibility and effect determinations, and notify and request SHPO acknowledgement of Section 4(f) approach for undertaking.</td>
</tr>
<tr>
<td>November 17, 2017 SHPO letter to NDOT</td>
<td>Concurrence with the Indirect APE, concurrence with NRHP eligibility recommendations for historic architecture resources and certain archaeological resources. Requested additional information for certain archaeological resources.</td>
</tr>
<tr>
<td>December 11, 2017 NDOT letter to SHPO</td>
<td>Provide information requested in SHPO’s November 17, 2017 letter, request SHPO concurrence on eligibility and effect determinations for individual resources and undertaking.</td>
</tr>
<tr>
<td>January 8, 2018 SHPO letter to NDOT</td>
<td>Concurrence with eligibility determinations for remaining archaeological resources and finding of Adverse Effect for undertaking.</td>
</tr>
</tbody>
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### Section 106: Advisory Council on Historic Preservation

<table>
<thead>
<tr>
<th>Date/Document</th>
<th>Subject</th>
</tr>
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<tbody>
<tr>
<td>June 19, 2013 FHWA letter to ACHP</td>
<td>Invitation to participate in Section 106 process and Programmatic Agreement</td>
</tr>
<tr>
<td>July 26, 2013 ACHP letter to FHWA</td>
<td>Decline participation in Section 106 process. Noted requirement to file final Programmatic Agreement and supporting documentation with ACHP at conclusion of consultation process.</td>
</tr>
<tr>
<td>February 7, 2018 NDOT email to ACHP</td>
<td>Transmitting e-106 form notifying the ACHP of a finding that undertaking may adversely affect historic properties.</td>
</tr>
<tr>
<td>February 22, 2018 ACHP letter to FHWA</td>
<td>Decline participation in Section 106 process.</td>
</tr>
<tr>
<td>February 26, 2018 NDOT email to ACHP</td>
<td>Clarify the finding of adverse effect, that FHWA and NDOT have consulted with tribes, and that FHWA and NDOT propose a Memorandum of Agreement (MOA) to resolve adverse effect and not a Standard Treatment Plan.</td>
</tr>
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<tbody>
<tr>
<td>February 27, 2018 ACHP email to NDOT</td>
<td>Acknowledged NDOT’s 2/26/18 clarifications, declined to participate in consultation to resolve adverse effect, and noted the requirement to file the signed MOA to the ACHP to complete Section 106 for the project.</td>
</tr>
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</table>

### Wildlife and Plant Species Correspondence

<table>
<thead>
<tr>
<th>Date/Document</th>
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</tr>
</thead>
<tbody>
<tr>
<td>November 3, 2008 NDOT letter to Natural Heritage Program</td>
<td>Species List request</td>
</tr>
<tr>
<td>November 3, 2008 NDOT letter to US Fish and Wildlife Service</td>
<td>Request for Threatened and endangered species list and qualitative information and references for species within or adjacent to project area</td>
</tr>
<tr>
<td>November 18, 2008 USFWS letter to NDOT</td>
<td>Species information</td>
</tr>
<tr>
<td>October 4, 2011, USFWS email to Jacobs</td>
<td>Species list update</td>
</tr>
<tr>
<td>November 17, 2011, USFWS letter to Jacobs</td>
<td>Carson wandering skipper</td>
</tr>
<tr>
<td>December 8, 2011 Nevada Dept. of Wildlife letter to Jacobs</td>
<td>Wildlife resources information</td>
</tr>
<tr>
<td>January 21, 2009 Nevada Natural Heritage Program letter to NDOT</td>
<td>Information for endangered, threatened, candidate, and/or risk plant and animal taxa</td>
</tr>
<tr>
<td>February 1, 2015 Nevada Department of Wildlife data form</td>
<td>Request for wildlife data</td>
</tr>
<tr>
<td>February 9, 2015 Nevada Department of Wildlife letter to Jacobs</td>
<td>Wildlife data</td>
</tr>
<tr>
<td>February 26, 2015 Nevada Natural Heritage Program data form</td>
<td>Request for wildlife and plant data</td>
</tr>
<tr>
<td>March 5 and 24, 2015 Jacobs personal communication with Marcy Haworth, U.S. Fish and Wildlife Service</td>
<td>Carson wandering skipper and Webber’s ivesia</td>
</tr>
<tr>
<td>March 11, 2015 Nevada Natural Heritage Program letter to Jacobs</td>
<td>Wildlife and plant data</td>
</tr>
<tr>
<td>March 11, 2015 U.S. Fish and Wildlife letter to Jacobs</td>
<td>Wildlife and plant data</td>
</tr>
<tr>
<td>April 16, 2015 Washoe County email to Jacobs</td>
<td>Wildlife migration information</td>
</tr>
<tr>
<td>May 29, 2015 email documenting personal communication from Haworth, USFWS</td>
<td>Carson wandering skipper habitat patches too small to be considered suitable habitat; formal Carson wandering skipper surveys are not required.</td>
</tr>
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<tr>
<td>November 12, 2015 FHWA letter to USFWS</td>
<td>Documentation of informal consultation and determination of effect agreement for Carson Wandering Skipper</td>
</tr>
<tr>
<td>November 19, 2015 meeting with FHWA, BLM, NDOT, RTC</td>
<td>Sage Grouse</td>
</tr>
<tr>
<td>January 7, 2016 meeting with BLM and Jacobs</td>
<td>Application of Greater Sage Grouse Approved Resource Management Plan Amendment (ARMPA) Required Design Features (RDFs)</td>
</tr>
<tr>
<td>Parks and Recreation / Section 4(f) / Section 6(f) Correspondence</td>
<td></td>
</tr>
<tr>
<td>February 29, 2008 City of Sparks letter to BLM</td>
<td>Response to BLM request for written comments on Notice of Realty Action to lease and convey 265 of public land in Washoe County—Wedekind Park</td>
</tr>
<tr>
<td>November 12, 2008 City of Sparks letter to FHWA</td>
<td>Joint recreation and transportation use within Wedekind Park</td>
</tr>
<tr>
<td>April 9, 2009, RTC letter to BLM</td>
<td>Sparks Justice Center and Wedekind Park</td>
</tr>
<tr>
<td>April 22, 2009, BLM letter to RTC</td>
<td>Wedekind Regional Park</td>
</tr>
<tr>
<td>August 23, 2011, Resolution of Support, Pyramid Highway/US 395 Connector EIS, Washoe County</td>
<td>Sun Valley Open Space (APN 035-370-01)</td>
</tr>
<tr>
<td>October 1, 2012 RTC letter to City of Sparks</td>
<td>Letter sent to City of Sparks in draft form regarding Section 4(f) uses at Wedekind Park, intent for a <em>de minimis</em> finding, and concurrence request</td>
</tr>
<tr>
<td>April 3, 2013 RTC letter to City of Sparks</td>
<td>Letter to City of Sparks in final signed form regarding Section 4(f) uses at Wedekind Park, intent for a <em>de minimis finding</em>, and concurrence request. Includes City of Sparks signed concurrence dated 5/13/13</td>
</tr>
<tr>
<td>March 26, 2015, email from City of Sparks Parks and Recreation</td>
<td>No timeframe for disposal of Wildcreek Park has been identified.</td>
</tr>
<tr>
<td>May 14, 2015 Jacobs email to National Park Service and Nevada State Parks</td>
<td>Request for concurrence that project would not result in a Section 6(f) conversion</td>
</tr>
<tr>
<td>May 18, 2015 National Park Service email to Jacobs</td>
<td>Concurrence that project would not result in a Section 6(f) conversion</td>
</tr>
<tr>
<td>May 19, 2015 Nevada State Parks email to Jacobs</td>
<td>Concurrence that project would not result in a Section 6(f) conversion</td>
</tr>
<tr>
<td>February 1, 2017</td>
<td>Sky Ranch Park disposed of and no longer owned or maintained by Washoe County</td>
</tr>
<tr>
<td>March 27, 2017, email from City of Sparks Parks and Recreation</td>
<td>Wildcreek Park remains in the City’s inventory, but is still recommended for decommissioning at some point.</td>
</tr>
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<tr>
<td>August 31, 2017 email from Eric Crump/Washoe County to Dennis Troy</td>
<td>Email summarizing status of WCSD’s plans to build new high school on Wildcreek Golf Course site.</td>
</tr>
<tr>
<td>September 5, 2017 phone call between Joe Gabica/WCSD and Misty Swan/Jacobs Engineering</td>
<td>Discuss status of WCSD’s plans to build new high school on Wildcreek Golf Course site.</td>
</tr>
<tr>
<td><strong>Historic Section 4(f)</strong></td>
<td></td>
</tr>
<tr>
<td>October 19, 2017 NDOT letter to SHPO</td>
<td>Notice of FHWA intent to make <em>de minimis</em> finding, and FHWA’s use of the Section 4(f) exception for three archaeological resources.</td>
</tr>
<tr>
<td>December 2017 emails between FHWA and SHPO</td>
<td>Documents FHWA’s discussion with SHPO regarding Section 4(f) approach for undertaking and notice to SHPO of FHWA’s intent to <em>make de minimis</em> finding.</td>
</tr>
<tr>
<td>December 20, 2017 SHPO letter to NDOT</td>
<td>Acknowledges receipt of documentation required under 23 CFR 774 and stated no objection to application of exception in 23 CFR 774.13(b)(2) for properties eligible under criterion D with minimal value for preservation in place.</td>
</tr>
<tr>
<td>January 18, 2018 FHWA email to SHPO</td>
<td>Request for SHPO to provide written concurrence on No Adverse Effect to Prosser Valley Ditch in order for FHWA to comply with 23 CFR 774.5(b)(1)(ii).</td>
</tr>
<tr>
<td>January 31, 2018 SHPO email to FHWA</td>
<td>SHPO’s written concurrence that undertaking would not pose an adverse effect to the Prosser Valley Ditch.</td>
</tr>
<tr>
<td>February 1, 2018 FHWA email to SHPO</td>
<td>Thanks for providing required written concurrence on no adverse effect to Prosser Valley Ditch.</td>
</tr>
<tr>
<td><strong>Technical Advisory Committee</strong></td>
<td></td>
</tr>
<tr>
<td>February 21, 2008 meeting minutes</td>
<td>Meeting minutes: review of project goals, objectives, organization, and alternatives development</td>
</tr>
<tr>
<td>April 17, 2008 meeting minutes</td>
<td>Meeting minutes: update on environmental, engineering, and traffic analysis activity</td>
</tr>
<tr>
<td>July 17, 2008 meeting minutes</td>
<td>Meeting minutes: update on environmental activity, overview of level 1 screening process, engineering update</td>
</tr>
<tr>
<td>September 18, 2008 meeting minutes</td>
<td>Meeting minutes: update on environmental activity, overview of level 1 screening process, and description of the level 2A process</td>
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<tr>
<td>January 15, 2009 meeting minutes</td>
<td>Meeting minutes: update on environmental activity, level 2A screening, and travel demand and traffic analysis</td>
</tr>
<tr>
<td>February 19, 2009 meeting minutes</td>
<td>Meeting minutes: update on environmental activity and level 2A screening process</td>
</tr>
<tr>
<td>May 21, 2009 meeting minutes</td>
<td>Meeting minutes: update on environmental activity, alternatives development, traffic analysis, and level 2B screening</td>
</tr>
<tr>
<td>July 16, 2009 meeting minutes</td>
<td>Meeting minutes: update on environmental activity and right-of-entry process</td>
</tr>
<tr>
<td>October 15, 2009 meeting minutes</td>
<td>Meeting minutes: alternatives development, including design concept review</td>
</tr>
<tr>
<td>January 21, 2010 meeting minutes</td>
<td>Meeting minutes: update on environmental activity, traffic demand, level of service, alternatives development, and public outreach</td>
</tr>
<tr>
<td>August 19, 2010 meeting minutes</td>
<td>Meeting minutes: update on environmental activity and alternatives development, discussion of project phasing</td>
</tr>
<tr>
<td>February 17, 2011 meeting minutes</td>
<td>Meeting minutes: update on environmental activity, level 3 screening, and level 3 traffic analysis</td>
</tr>
<tr>
<td>March 17, 2011 meeting minutes</td>
<td>Meeting minutes: discussion of supplemental alternatives screening and public outreach update</td>
</tr>
<tr>
<td>August 14, 2012 RTC Email to TAC Members</td>
<td>Project status update</td>
</tr>
<tr>
<td>February 19, 2014 meeting</td>
<td>Project status update, review DEIS comments and select a preferred alternative</td>
</tr>
<tr>
<td>March 3, 2015 meeting minutes</td>
<td>Project status review; traffic reanalysis; validation of DEIS decision, alternatives screening, and selected preferred alternative; review of preferred alternative redesign</td>
</tr>
<tr>
<td>June 7, 2017</td>
<td>Project status review; traffic reanalysis; validation of DEIS decision, alternatives screening, modified Arterial Alternative designs and impacts, selected preferred alternative; review of preferred alternative redesign</td>
</tr>
<tr>
<td><strong>General</strong></td>
<td></td>
</tr>
<tr>
<td>January 19, 2012 letter from Natural Resources Conservation Service to Jacobs</td>
<td>No Prime or Unique Farmlands within the study area, no conversation impact rating is required</td>
</tr>
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<tr>
<td>June 27, 2013 letter from State of Nevada Department of Conservation &amp; Natural Resources Division of Water Resources</td>
<td>Comments about required coordination, approvals, and mitigation measures regarding area water rights; water or monitor wells or boreholes; and water used for construction</td>
</tr>
<tr>
<td>November 24, 2015 City of Sparks letter to BLM</td>
<td>Location of proposed Veterans Cemetery as relates to the Pyramid/US 395 Connector Project</td>
</tr>
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Appendix A:
Agency Coordination

Letters of Intent to Study
To Whom It May Concern:

The Nevada Department of Transportation, along with the Federal Highway Administration and the Washoe County Regional Transportation Commission, is proposing to prepare an Environmental Impact Statement in compliance with the National Environmental Policy Act (NEPA) to study transportation improvements along the Pyramid Highway corridor from Queen Way to Calle de la Plata, and improving east-west connections from US 395 to Vista Drive. A Notice of Intent was published in the Federal Register February 29, 2008.

This letter is to inform you of the study and solicit your comments concerning the project. Areas of potential impact could include, but are not limited to, the following:

1. Access
2. Aesthetics
3. Air Quality
4. Archaeological Resources
5. Geology
6. Hazardous Waste
7. Historic Buildings
8. Land Use
9. Public Parks & Recreation Areas
10. Noise Levels
11. Safety
12. Social Considerations
13. Vegetation
14. Water Quality and Hydrology
15. Wildlife and Wildlife Refuges

An information meeting will be held on Tuesday, April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada to inform you, as interested individuals, groups, and agencies, about the project and to receive your comments and suggestions. Please see the enclosed Transportation Notice for further information.

We would appreciate receiving any response you may have by 5 p.m., Friday, May 2, 2008. If no response is received, the department will assume you foresee no potential impacts in your particular area of responsibility or interest. Comments or questions regarding the proposed project may be addressed to:

Daniel Nollisch  
Environmental Services Supervisor  
Nevada Department of Transportation  
Environmental Services Division  
1263 South Stewart Street  
Carson City, NV 89712  
Ph: 775-888-7013

Sincerely,

Steve M Cooke, P.E., Environmental Services Division Chief
PUBLIC INFORMATION MEETING

PURPOSE OF MEETING: The Washoe County Regional Transportation Commission (RTC), acting on behalf of the Nevada Department of Transportation (NDOT), and in cooperation with the Federal Highway Administration (FHWA) is conducting a Public Information Meeting to provide project information and receive comments from the public on the proposed Pyramid Highway/US 395 Connection project.

WHEN AND WHERE: Tuesday, April 15, 2008
4:00 p.m. to 7:00 p.m.
Lazy 5 Community Center,
7100 Pyramid Highway
Sparks, Nevada.

WHY: The project will involve preparation of an Environmental Impact Statement in compliance with the National Environmental Policy Act (NEPA). The project will study transportation improvements along the Pyramid Highway corridor from Queen Way to Calle de la Plata, and improving east/west connections from US 395 to Vista Drive.

WHERE YOU COME IN: You are invited to attend the Public Information Meeting at your convenience anytime between 4:00 p.m. and 7:00 p.m. Project representatives will be available to discuss the project and answer questions. There will be a brief presentation about the project at 5:30 p.m. followed by a short open comment period. The meeting format will be “open house” from 4:00 p.m. to 5:30 p.m., returning to the open house format following the presentation/comment session. This will allow you to talk to project representatives individually. You will have an opportunity to submit your comments in writing on a comment sheet provided at the meeting or verbally to a court reporter who will be available throughout the meeting to record your comments. In addition, written comments will also be accepted until 5:00 p.m. Friday, May 2, 2008.

Please submit comments to: Doug Maloy, PE, Project Manager, Regional Transportation Commission of Washoe County, 1105 Terminal Way, Suite 108, Reno, Nevada, 89502, phone (775) 335-1865, fax (775) 348-0170, email dmaloy@rtcwashoe.com or to Steve M. Cooke, P.E., Chief, NDOT Environmental Services Division, 1263 South Stewart Street, Room 104, Carson City, NV 89713, phone (775) 888-7013, fax: (775) 888-7104. You may also submit online at http://www.nevadadot.com/pub_involvement/meetings; refer to Pyramid Highway/US 395 Connection in the subject line.

General information about the Public Information Meeting can be obtained from Doug Maloy, PE, Project Manager, Regional Transportation Commission of Washoe County, 1105 Terminal Way, Suite 108, Reno, NV 89502, phone (775) 335-1865, fax (775) 348-0170 or e-mail dmaloy@rtcwashoe.com.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 will govern the acquisition of any right-of-way necessary for this project.

Pursuant to Title II of the Americans with Disabilities Act (ADA), the RTC and NDOT do not discriminate on the basis of disability in admissions to or participation in public meetings. Individuals with disabilities requiring accommodations for effective participation and communication at the meeting may contact Julie Maxey, Public Hearings Officer (775) 888-7171, to make known their needs and preferences. Request for accommodation must be at least 48 hours in advance of the meeting.
ROBERT CASHELL
MAYOR
PO BOX 1900
RENO NV 89505

PIERRE HASCHEFF
CITY COUNCIL MEMBER AT-LARGE
PO BOX 1900
RENO NV 89505

DAN GUSTIN
CITY COUNCIL MEMBER WARD 1
PO BOX 1900
RENO NV 89505

SHARON ZADRA
CITY COUNCIL MEMBER WARD 2
PO BOX 1900
RENO NV 89505

JESSICA SFERRAZZA
CITY COUNCIL MEMBER WARD 3
PO BOX 1900
RENO NV 89505

DWIGHT DORTCH
CITY COUNCIL MEMBER WARD 4
PO BOX 1900
RENO NV 89505

DAVID AIAZZI
CITY COUNCIL MEMBER WARD 5
PO BOX 1900
RENO NV 89505

LISA MANN
COMMUNITY LIAISON
PO BOX 1900
RENO NV 89505

BARBARA DICIANN0
COMMUNITY LIAISON
PO BOX 1900
RENO NV 89505

LAURA MAGNESS
COMMUNITY LIAISON
PO BOX 1900
RENO NV 89505

MARCUS WHITE
COMMUNITY LIAISON
PO BOX 1900
RENO NV 89505

CHARLES MCNEELY
CITY MANAGER
PO BOX 1900
RENO NV 89505

JEFF MANN, PARK MANAGER
CITY OF RENO
PO BOX 1900
RENO NV 89505

GENO MARTINI, MAYOR
CITY OF SPARKS
431 PRATER WAY
PO BOX 857
SPARKS NV 89432-0857

JOHN MAYER
CITY COUNCIL MEMBER WARD 1
431 PRATER WAY
PO BOX 857
SPARKS NV 89432-0857

PHIL SALERNO
CITY COUNCIL MEMBER WARD 2
431 PRATER WAY
PO BOX 857
SPARKS NV 89432-0857

RON SMITH
CITY COUNCIL MEMBER WARD 3
431 PRATER WAY
PO BOX 857
SPARKS NV 89432-0857

MIKE CARRIGAN
CITY COUNCIL MEMBER WARD 4
431 PRATER WAY
PO BOX 857
SPARKS NV 89432-0857
Abdelmoez A. Abdalla  
Environmental Program Manager  
Federal Highway Administration  
705 N. Plaza, Suite 220  
Carson City, NV 89701

Subject: Scoping Comments for the Proposed Improvements to Pyramid Way and the Proposal for a New Corridor from Vista Boulevard to US-395, Washoe County, Nevada

Dear Mr. Abdalla:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Register Notice published on February 29, 2008, requesting comments on the Federal Highway Administration (FHWA) decision to prepare a Draft Environmental Impact Statement (DEIS) for the proposed improvements to Pyramid Way and the proposal for a new corridor from Vista Boulevard to US-395 in Washoe County, Nevada.

EPA looks forward to coordination for this project as a participating agency, as defined in the environmental review process discussed in Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU).

The enclosed comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. EPA appreciates the opportunity to comment on preparation of the DEIS.

We understand that there will be an agency scoping meeting on April 16. If we are unable to attend in person, we would like to participate in this meeting via conference call. Please contact Carolyn Mulvihiill, lead NEPA reviewer for this project (mulvihiill.carolyn@epa.gov, 415-947-3554) with information regarding calling in to the meeting.

Once the DEIS is released for public review, please send two hard copies and, if available, one electronic copy to Carolyn at the address above (mail code: CED-2) and contact Carolyn with any questions related to the comments provided in this letter. We look forward to participating in the project’s EIS development and reviewing the DEIS.
Enclosures:
EPA's Detailed Comments

cc: Steve Cooke, Nevada Department of Transportation
Doug Maloy, Regional Transportation Commission
Steve Roberts, U.S. Army Corps of Engineers
Steve Abel, U.S. Fish and Wildlife Service
Purpose and Need

The purpose and need statement developed for the proposed project should concisely identify why the project is being proposed and should focus on the desired outcomes of the project (to relieve congestion, for example) rather than methods to address the desired outcomes (increase capacity, for example). Specifically, the need for the proposed improvements must be articulated and justified with consideration of the existing facilities in the area. The two major elements of the proposed project, improvements to Pyramid Way and the new corridor, should each be justified.

The projections of future growth and travel increases used to identify the need for the proposed project should be presented with the assumptions used for land use and travel demand forecasting. The Draft Environmental Impact Statement (DEIS) should incorporate estimates of the magnitude of induced travel into any travel demand modeling and impact analysis (www.fhwa.dot.gov/steam/doc.htm).

Range of Alternatives

The DEIS should examine a full range of alternatives to meet the purpose and need for the project. The Federal Register Notice states that the DEIS will consider various improvement alternatives as well as a no action alternative. Given the relative lack of current development in the vicinity of the proposed project, EPA recommends that the DEIS consider all reasonable alternatives (Council on Environmental Quality 40 Most Asked Questions, Number One and Number Two, Federal Register Volume 46, Number 55). Specifically, EPA recommends that the DEIS consider an alternative or group of alternatives that maximizes the use of existing facilities, including Value Pricing, or other market-based traffic-management approaches. Congestion pricing, high occupancy toll lanes, and fast and intertwined regular (FAIR) lanes can also reduce delay and address congestion issues (DeCorla-Souza and Skaer. Federal Highway Administration. Transportation Research Board Paper No. 03-2941).

EPA commented on October 3, 2007 on a Notice of Intent (NOI) for proposed improvements to the intersection of Pyramid Way and McCarren Boulevard. It is unclear from the NOIs whether the two proposed projects will be directly adjacent to one another, but since the project areas are close, the environmental analysis should include information on how the environmental, design, and construction processes for the two projects will relate. In particular, it is important that any selection of alternatives made for the intersection not preclude a full range of reasonable alternatives from being included in the environmental analysis of improvements to Pyramid Way.

Impacts to Surface Water Hydrology and Water Quality

The vicinity of the proposed project appears to contain large areas of undeveloped land adjacent to residential and other development. The undeveloped areas could contain ephemeral
streams, washes, and other hydrologic features that may provide water quality, flood control, and ecological values.

Potential impacts resulting from the proposed project may be both direct, from construction and use of the facility, and indirect, from growth inducement resulting from the project. These include potential erosion and other construction-related impacts from what may be a lengthy, multi-phased project build-out. Specifically, aquatic ecosystems may be altered by permanently changing hydrological processes, potentially increasing the velocity and volume of stormwater flows, and discharging pollutants from nuisance flows from development into receiving waters. This is particularly important to consider with new highway alignments and new interchanges associated with a new facility, which can lead to multiple resources impacted within the "zone of influence" that new interchanges provide.

Recommendations:
• The DEIS should address each of these potential direct and indirect, or secondary, impacts and identify specifically how each of the following impacts will be minimized or avoided:
  (1) changes in hydrology and sediment transport capacity of currently undeveloped areas;
  (2) increases in impervious surfaces and the corresponding increases in the volume and velocity of polluted stormwater;
  (3) decreases in water quality from the impairment of floodplain and ecosystem functions including water filtration, groundwater recharge, and flood attenuation;
  (4) disruption of hydrological and ecological connectivity; and
  (5) decreases in biodiversity and ecosystem stability.

Impacts to CWA Section 404 Waters
Discharges of dredged or fill material into waters of the United States require authorization by the U.S. Army Corps of Engineers under Clean Water Act Section 404. This project may meet the criteria for coordination under the NEPA/404 MOU, which includes specific concurrence points to assist in developing the DEIS and involves active participation by resource agencies in meetings and document reviews. We encourage the Federal Highway Administration (FHWA) to contact the NEPA/404 signatory agencies once more information about the potential impact to waters of the United States is available so that the concurrence points, if necessary, can be addressed as early as possible in the EIS process.

Recommendations:
• Disclose the approximate acreage and function of waters that occur within the study area of the proposed project, including permanent, intermittent, and ephemeral streams, wetlands, and other waterways, including floodplains.
• Disclose sufficient detail about potential adverse effects on local and regional water quality that may result from stormwater runoff and other nuisance flows as envisioned under 40 CFR 230.10(b), 40 CFR 230.12(a)(3)(iv), and NEPA. The DEIS should describe how the project will manage stormwater while not compromising the natural ecosystem.
• Address impacts to floodplains and discuss methods to avoid and minimize these impacts.
• Avoid and minimize direct and indirect impacts to waters to the maximum extent practicable and quantify water resources avoided. Typically, transportation projects can accomplish this by: (1) using spanned crossings, arch crossings, or oversized buried box culverts over drainages to encourage continuity of sediment transport and hydrological processes and wildlife passage; (2) moving road alignments to avoid impacts to wetlands and waterways; and (3) establishing and maintaining adequate buffers away from aquatic resources.

Indirect Growth Impacts

EPA is concerned about the potential indirect impacts (40 CFR Part 1508.8(b)) of this project. Improved access to undeveloped areas may affect the location and timing of growth on surrounding lands. The project would benefit from analysis of growth-related impacts early in project development. A growth-related impact analysis assists with compliance requirements of NEPA by considering environmental consequences as early as possible and providing a well-documented and sound basis for government decisionmaking.

The May 2006 Guidance for Preparers of Growth-related, Indirect Impact Analyses (Guidance) [http://w ww.dot.ca.gov/ser/Growth-related_IndirectImpactAnalysis/gri_guidance.htm] developed jointly by the California Department of Transportation (Caltrans), FHWA, and EPA, provides an approach to developing a growth-related impact analysis. The Guidance is relevant to highway projects outside of California. After the potential for growth is identified for each alternative, the Guidance recommends assessing if growth-related impacts affect resources of concern.

Recommendations:
• Identify if the project will affect the location and/or timing of planned growth in the area. Specifically, the analysis should identify the potential resources that may be affected by the increased “zone of influence” associated with interchanges and impacting resources outside of the right-of-way.
• Identify the types of resources that are likely to occur in geographic areas that may be affected by growth. If it is determined that there will be no, or insignificant, impacts to resources of concern, then document the analysis process and report the results. EPA recommends following the Step-by-Step Approach for Conducting the Analysis in Chapter 6 of the Guidance.
• Include a discussion of mitigation strategies to reduce impacts if adverse impacts cannot be avoided or minimized. Section 6.3 of the Guidance provides an approach to address mitigation for growth-related impacts.

Cumulative Impact Analysis

Cumulative impacts are defined in CEQ’s NEPA regulations as the impact on the environment that results from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-
Federal) or person undertakes such actions (40 CFR 1508.7). These actions include both transportation and non-transportation activities. The cumulative impact analysis should consider non-transportation projects such as large-scale developments and approved urban planning projects that are reasonably foreseeable and are identified within city and county planning documents.

The cumulative impact analysis should describe the "identifiable present effects" to various resources attributed to past actions. The purpose of considering past actions is to determine the current health of resources. This information forms the baseline for assessing potential cumulative impacts and can be used to develop cooperative strategies for resource protection (CEQ's Forty Most Frequently Asked Questions #19).

The cumulative impact analysis for the project also provides an opportunity to identify potential large, landscape-level statewide and regional impacts, as well as potential large-scale mitigation measures. The analysis should examine landscape-level impacts to all sensitive resources. The cumulative impact analysis should guide future environmental analyses and potential avoidance and minimization measures, while focusing design and mitigation efforts.

**Recommendations:**

- Conduct a thorough cumulative impact assessment that includes a complete list of reasonably foreseeable actions, including non-transportation projects.
- EPA recommends the use of the June 2005 *Guidance for Preparers of Cumulative Impacts Analysis* developed jointly by Caltrans, FHWA, and EPA [http://www.dot.ca.gov/sr/cumulative_guidance/purpose.htm]. The guidance is relevant to highway projects outside of California and will assist in identifying cumulative impacts and preparing an analysis that is sound, well documented, and compliant with 404(b)(1) Guidelines. The DEIS should include the following eight steps for identifying and assessing cumulative impacts:
  1. Identify the resources to consider in the cumulative impact analysis by gathering input from knowledgeable individuals and reliable information sources. This process is initiated during project scoping and continues throughout the NEPA analysis.
  2. Define the geographic boundary or Resource Study Area (RSA) for each resource to be addressed in the cumulative impact analysis.
  3. Describe the current health and the historical context of each resource.
  4. Identify the direct and indirect impacts of the proposed project that might contribute to a cumulative impact on the identified resources.
  5. Identify the set of other current and reasonably foreseeable future actions or projects and their associated environmental impacts to include in the cumulative impact analysis.
  6. Assess the potential cumulative impacts.
  7. Report the results of the cumulative impact analysis.
  8. Assess the need for mitigation and/or recommendations for actions by other agencies to address a cumulative impact.
- Identify potential large, landscape-level regional impacts, as well as potential large-scale mitigation measures.
Air Quality

Washoe County is federally designated serious nonattainment for particulate matter smaller than 10 microns (PM$_{10}$) and moderate nonattainment for carbon monoxide (CO). Because of the area's nonattainment status, it is important to reduce emissions of CO and particulate matter from this project to the maximum extent. Hot spot analysis for CO and a qualitative PM$_{10}$ analysis are required as part of the environmental review process. The DEIS should also identify sensitive receptors in the vicinity of the project area.

*Recommendations:*

- Provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), criteria pollutant nonattainment areas, and potential air quality impacts of the project (including cumulative and indirect impacts) for each alternative.
- Include a thorough analysis of impacts from the construction and operation of the proposed alternatives. Include monitoring data, any anticipated exceedances of NAAQS, and estimates of all criteria pollutant emissions and diesel particulate matter (DPM), including the federal 8-hour ozone standard and the PM$_{2.5}$ standard.
- Disclose the available information about the health risks associated with vehicle emissions, sensitive receptors in the vicinity of the project area, and how the proposed project will affect current emission levels.

*Construction*

FHWA should include a Construction Emissions Mitigation Plan for fugitive dust and DPM in the DEIS and adopt this plan in the Record of Decision (ROD). EPA recommends the following mitigation measures be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of DPM and other toxics from construction-related activities.

*Fugitive Dust Source Controls:*

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earthmoving equipment to 10 mph.

*Mobile and Stationary Source Controls:*

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturers' specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary
idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.

- Prohibit any tampering with engines and require continuing adherence to manufacturers' recommendations.
- If practicable, lease new equipment meeting the most stringent of applicable Federal or state standards.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of DPM and other pollutants at the construction site.

**Administrative Controls:**

- Coordinate with appropriate air quality agencies to identify a construction schedule to minimize cumulative impacts from multiple development and construction projects in the region, if feasible to minimize cumulative impacts.
- Identify all commitments to reduce construction emissions and quantify air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased down time and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify sensitive receptors and sensitive receptor locations in the project area, such as children, elderly, schools, and hospitals, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

**Transportation Conformity**

The DEIS should demonstrate that the project is included in a conforming transportation plan and a transportation improvement program. The DEIS should ensure that the emissions from both the construction and the operational phases of the project conform to the applicable State Implementation Plans, if appropriate, and do not cause or contribute to violations of the NAAQS.
Mobile Source Air Toxics

EPA, FHWA, and the Nevada Department of Transportation (NDOT) have recently initiated a dialogue regarding analysis of mobile source air toxics (MSATs) for highway projects in Nevada. EPA's recommendations for MSAT analysis have focused on identification of sensitive receptors, dispersion modeling to determine MSAT impacts at sensitive receptor locations, and use of this data to inform decision making on project alternatives and mitigation measures.

MSAT impacts were the primary concern of the Sierra Club in its legal challenge to an US 95 widening project in Las Vegas (Sierra Club v. Mineta, D. Nev., No. CV-S-02-0578-PMP-RJJ, settlement announced 6/27/05). The settlement agreement in this case requires FHWA and NDOT to install air pollution monitoring and filtration systems at three schools adjacent to US 95, relocate portable school buildings and playgrounds, help redesign a nearby high school to minimize exposures, and retrofit diesel school buses to reduce emissions.

A large number of recent studies have examined the association between living near major roads and different adverse health endpoints. Several well-conducted epidemiologic studies have shown associations with cardiovascular effects, premature adult mortality, and adverse birth outcomes, including low birth weight and size. Traffic-related pollutants have been repeatedly associated with increased prevalence of asthma-related respiratory symptoms in children. Also, based on toxicological and occupational epidemiologic literature, several of the MSATs, including benzene, 1,3-butadiene, and diesel exhaust, are classified as known and likely human carcinogens. Thus, cancer risk, including childhood leukemia, is a potential concern in near roadway environments. For additional information on MSATs, please see EPA's MSAT website: http://www.epa.gov/otaq/toxics.htm.

Given the significant concerns about adverse health effects from MSATs and the project's potential for emissions in close proximity to current and future residential communities and sensitive receptors, EPA recommends performing an analysis of potential MSAT impacts to inform decision making between project alternatives and to inform avoidance, minimization, and mitigation options, such as restricting future growth near roadways. When considering appropriate and useful levels of analysis, EPA recommends that FHWA consider the following:

- The likelihood of impact and potential magnitude of the effect, including both the magnitude of emissions and the proximity of the project emissions to potential residential and sensitive receptors, such as schools, hospitals, day care facilities, and nursing homes;
- The severity of existing conditions;
- Whether the project is controversial and whether air toxics concerns have been raised by the public for this project or for other projects in the area in the past;
- Whether there is a precedent for analysis for projects of this type, either under NEPA or other environmental laws; and
- Whether the analysis could be useful for distinguishing between alternatives, informing design changes, and targeting mitigation.
The March 2007 report entitled "Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process" conducted for the American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on the Environment and funded by the Transportation Research Board (http://www.trb.org/NotesDocs/25-25(18)_FR.pdf) describes the following levels of analysis for consideration in MSAT analyses: qualitative discussion; quantify emissions; toxicity-weight emissions; dispersion modeling; and risk assessment.

Procedures for toxicity-weighting, which EPA has found to be especially useful for the targeting of mitigation, are described in EPA's Air Toxics Risk Assessment Reference Library (Volume 3, Appendix B, beginning on page B-4, http://epa.gov/tnn/fera/data/risk/vol_3/Appendix_B_April_2006.pdf). These recommendations, and the recommendations included in the report for AASHTO referenced above, differ substantially from the FHWA interim guidance (February 2006) on MSAT analysis for transportation projects under NEPA. While there are positive elements to the FHWA guidance, especially the acknowledgement of potential MSAT concerns, EPA continues to disagree with major elements of the FHWA approach nationally. EPA is available to work with FHWA to evaluate the appropriate level of MSAT analysis for this project.

**Recommendations:**

- Include an analysis of potential MSAT impacts in the DEIS to inform decisionmaking between project alternatives and to inform avoidance, minimization, and mitigation options.
- The analysis should include a combination of the following methods, depending upon the factors discussed above: qualitative discussion, quantification of emissions, toxicity-weight emissions, dispersion modeling, and risk assessment.

**Environmental Justice**

Executive Order 12898 addresses Environmental Justice in minority and low-income populations, and the Council on Environmental Quality has developed guidance concerning how to address Environmental Justice in the environmental review process (http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf).

**Recommendations:**

- The DEIS should include a description of the area of potential impact used for the environmental justice impact analysis and provide the source of the demographic information.
- The DEIS should identify whether the proposed alternatives may disproportionately and adversely affect low-income or minority populations in the surrounding area and should provide appropriate mitigation measures for any adverse impacts.
Protection of Historic and Cultural Resources

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic properties, which include buildings, structures, objects, sites, districts, and archaeological resources.

Recommendations:
- In the DEIS, assess potential impacts to historical, archaeological, and cultural resources and coordinate with affected Tribes and other interested parties.
- Clearly document the methodology used for determining the potential impacts to cultural and historic resources.
- Address what mitigation techniques will be used should sensitive resources be discovered, including recording or removal of materials, and/or changes in project design.
- Identify the status of any Memorandum of Understanding with the State Historic Preservation Officer regarding the project.

Biological Resources

The proposed project may have direct and indirect impacts on federal- and state-listed threatened and endangered species and other biological resources in the project vicinity.

Recommendations:
- Identify all petitioned and listed threatened and endangered species and critical habitat within the project area and assess which species and critical habitats might be directly or indirectly affected by each alternative.
- Include the status of the Endangered Species Act Section 7 consultation process.
- Describe efforts to avoid and/or minimize impacts to species and their associated habitats.
- In accordance with Executive Order 13112 on Invasive Species, identify proposed methods to minimize the spread of invasive species and use native plant and tree species where revegetation is planned. Commit to saving removed native soils for use in revegetation projects.
- Clearly demonstrate compliance with Section 4(f) (49 U.S.C. 303).
April 8, 2008

Daniel Nollsch
Environmental Services Supervisor
Nevada Department of Transportation
Environmental Services Division
1263 South Stewart Street
Carson City, Nevada 89712

Dear Mr. Nollsch:

This is in response to your request for comments on the Intent-to-Study, Proposed Pyramid Highway/US 395 Connector Project.

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the City of Reno (Community Number 320020), City of Sparks (Community Number 320021), and Washoe County (Community Number 320019); all maps are revised as of June 6, 2001. Please note that the Cities of Reno and Sparks, and Washoe County, Nevada are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.
Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtml.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Washoe County floodplain manager can be reached by calling David T. Price, PE, County Engineer, at (775) 328-2045. The City of Reno floodplain manager can be reached by calling Kerri Williams-Lanza, Designated Floodplain Administrator, Senior Civil Engineer, at (775) 334-2683. The City of Sparks floodplain manager can be reached by calling Shawn Gooch, Flood Control Manager, at (775) 353-7824.

If you have any questions or concerns, please do not hesitate to call Sarah Owen of the Mitigation staff at (510) 627-7050.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Doug Maloy, PE, Project Manager, Regional Transportation Commission, Washoe County
Steve M. Cooke, PE, Chief, Nevada Department of Transportation, Environmental Services Division
Abdelmoez A. Abdalla, Environmental Program Manager, U. S. Department of Transportation, FHA, Nevada Division
David T. Price, PE, County Engineer, Washoe County
Kerri Williams-Lanza, Designated Floodplain Administrator, Senior Civil Engineer, City of Reno
Shawn Gooch, Flood Control Manager, City of Sparks
Christie James, NFIP Nevada State Coordinator, Nevada Division of Water Resources
Sarah Owen, Floodplanner, CFM, DHS/FEMA Region IX
Amaglio Alessandro, Environmental Officer, DHS/FEMA Region IX
Meeting Minutes

Project: Pyramid Highway/US 395 Connection
Purpose: Agency Scoping Meeting
Date Held: April 16th, 2008
Location: NDOT District II
310 Galletti Way, Sparks NV

Attendees:
RTC: Doug Maloy
FHWA: Abdelmoez (Del) Abdalla, Hanna Visser, Andrew Soderberg
NDOT: Steve Cooke
BLM: JoAnn Hufnagle
Reno Sparks Indian Colony: Scott Nebesky
US Fish and Wildlife Service: Marcy Haworth
CH2M HILL: Leslie Regos
Jacobs Carter Burgess.: Jim Clarke, David Dodson, Gina McAfee, Steve Oxoby

Copies: Attendees, File

Summary of Discussion:

1. Introductions
   - Jim Clarke welcomed the group, thanked them for their attendance and for their participation.
   - Jim Clarke gave a brief agenda overview.

2. Project Goals & Objectives
   - Jim Clarke gave a PowerPoint presentation (See attached PowerPoint presentation).
   - Questions and comments during the presentation included:
     a. Project development timeline:
        i. Del asked about funding allocated to the project.
        1. Doug stated that about 15 million has been allocated towards this corridor study and to the Pyramid/McCarran intersection corridor study.
        2. Funding availability for final design and construction is unknown at this time, however the project is on the fiscally constrained RTP.

3. Project Team Organization and Roles
   - Jim Clarke gave a PowerPoint presentation (See attached PowerPoint presentation).
   - Questions and comments during the presentation included:
     a. Project Steering Team:
i. Del asked who exactly makes up the Project Steering Team.
   1. The PST members have yet to be finalized, but the team will be made up from policy-level decision makers from the RTC, NDOT, FHWA, the city of Reno, the city of Sparks and Washoe County.
   2. Anticipate meeting with this team at specific milestones, approximately three or four times during the duration of the project.

4. Roles of Agencies (Participating, Cooperating)
   - Gina McAfee gave a PowerPoint presentation (See attached PowerPoint presentation).
   - Questions and comments during the presentation included:
     a. Participating Agencies:
        i. Gina handout out and explained the Coordination Plan (see handout).
        ii. It is assumed the federal agencies will be participating and must decline in writing otherwise.
        iii. Attendance at the TAC meetings by Participating and Cooperating Agencies would be ideal but not mandatory.
        iv. State and local agencies must respond in writing if wishing to participate as a Participating Agency and do not need to respond if declining.
        v. The project team has not received responses from any of the participating agencies as of yet, therefore we do not know who exactly will be participating agencies.
        vi. Interim deliverables have a 30 day response time. The DEIS has a 60 day response/comment time.

5. Project Development Process
   - Gina McAfee gave a PowerPoint presentation (See attached PowerPoint presentation).

6. Purpose and Need
   - Gina McAfee gave a PowerPoint presentation (See attached PowerPoint presentation).
   - Questions and comments during the presentation included:
     a. Purpose and Need:
        i. Del asked if the Purpose and Need was discussed or presented during the public meeting held on 4/15/08 and were comments received.
           1. The P&N was displayed on a board, included in the PowerPoint presentation, and was provided to attendees as a handout with specific questions asked about it.
           2. Comments were collected on the questionnaire/comment sheet that was provided at the meeting.
           3. Steve Cooke will provide Del with the handouts and the questionnaire that was provided at the public meeting.
        ii. Participating agencies will be given the chance to respond formally, but informal comments should be forwarded to Doug Maloy.
iii. Steve Cooke and Andrew Soderborg asked if the 2001 Pyramid Highway Corridor Management Plan reflects existing traffic conditions today.
   1. The effort will be made to compare the forecasts included in the 2001 CMP to what existing conditions are today.

iv. Del asked if Purpose and Need there is a difference between P&N elements one and five.
   1. P&N item one deals with existing congestion and P&N item five deals with future “regional mobility” or access needs.
   2. The project team will reword these two items.

7. Alternative Screening Methods
   - Gina McAfee gave a PowerPoint presentation (See attached PowerPoint presentation).
   - Gina handout out and explained the Methodology for Screening Alternatives to be used on the project (see handout).

8. Range of Alternatives
   - Gina McAfee gave a PowerPoint presentation (See attached PowerPoint presentation).
   - Gina handout out and explained the Initial Range of Alternatives (See handout).
   - Questions and comments during the presentation included:
     a. Modes:
        i. Andrew asked if pedestrian and bicycle facilities were brought up during the public meeting.
           1. There were no verbal comments received by the team regarding interest in pedestrian and bicycle facilities along the corridor.
     b. Location of east/west connection and north/south alternative to Pyramid:
        i. The location of the east/west connector and also that of a north/south alternative to Pyramid highway outside of the defined project area came up during the SWG meeting and also was a topic during the public meeting. Is a northern east/west connection feasible?
           1. The entire region is studied within the RTC’s RTP process and the study area for this project came out of this planning process.
           2. A northern connection would likely not serve the P&N for the majority of the study area. An additional EIS would likely be needed for this alternative.
           3. There is public involvement included within the RTC’s long range planning process.
           4. Necessary roadway improvements to US 395 up to the connection point and also the divergence between Pyramid and US 395 do not support a northern east/west connection.
           5. Del stated that the study area needs to be flexible in location at this point in the study.
           6. Hannah stated that, regardless of the defined study area, alternatives brought up during the NEPA process by the public and stakeholders must be evaluated to determine if they 1) meet purpose and need and 2) are reasonable and feasible before they can be eliminated from detailed study. A convincing statement of reasons must be provided to support
elimination of alternatives. Any alternatives that meet purpose and need and are reasonable and feasible should be carried forward for detailed review.

7. RTC’s planning department is involved with the TAC and will help the project team work out this issue.

8. Steve Cooke stated that reasons for studying this alternative need to be defensible when this issue inevitably comes up again.

ii. Andrew asked if a connection from Pyramid Highway over to US50 to the east was discussed during the public meeting.

1. Steve Oxoby mentioned that this alternative is shown in the RTC’s 2040 RTP.

iii. Del asked how realistic is this project and stated that it has been expressed to him that the project is not realistic, will not be funded for construction, and its potential impacts should not be included in the RTC’s long range planning efforts.

1. Doug stated that this project is included within the RTC’s long range planning.

2. The Executive Director of the RTC and the Board of Directors do consider this a feasible project and it is included within the STIP.

3. Funds have been allocated for the EIS effort and the RTC will be looking for funding for final design and construction throughout the project.

9. Environmental Resources of Concern
   - Gina McAfee gave a PowerPoint presentation (See attached PowerPoint presentation).
   - Questions and comments during the presentation included:
     a. Fish and Wildlife
        i. Marcy expressed concerns in regard to the Carson Wandering Skipper (direct and indirect effects, including those related to induced growth) within the following areas:
           1. Vista Blvd. around the Kylie Ranch development, just east of the project study area.
           2. Winnemucca Ranch Road on BLM land west of Pyramid Highway.
           3. Other private lands within the study area.
     b. EPA
        i. Although EPA could not attend the meeting, comments it provided on the Notice of Intent related to air quality, Environmental Justice, and cumulative impacts.
     c. FEMA
        i. Comments received regarding the Notice of Intent.
     d. Bureau of Indian affairs:
        i. Jim Clarke to confirm if there are any tribal lands within the study area and which designation they are. Danny noted that he had received an email about this and will forward this to Jim Clarke.
     e. BLM:
        i. All BLM lands are designated for recreation or open space. These lands may have some limitations if they are proposed for transportation.
ii. There was public concern about reserving the BLM land as open space.

iii. This land will need to be evaluated as to its relationship to Section 4(f)

iv. The EA that BLM prepared for the Wedekind Park land transfer included some language about joint development of the property for park and transportation use. This study team will discuss this issue in more detail with FHWA and others.

f. NDOT/FHWA

i. NDOT and FHWA will forward any concerns received by the participating agencies to Doug or the project team.

10. **What do you need from us?**

11. **What we need from you.**

12. **Next Steps**

   - Information gathered from Public Meeting:
     a. Improvements to the existing pyramid corridor and the need for a connector are needed and wanted.
     b. Interest in alternative modes:
        i. Bus service and improvements
        ii. Light-rail
     c. NIMBY
     d. Traffic along horse trails in the northern portion of the study area. Pyramid Highway is a two lane roadway in this area.
     e. Better coordination with developers and Federal government. Concern about ever increasing development.
     f. Potential impacts to US 395 with east/west connection.
     g. Location of the east/west connection.
     h. Convert McCarran into a restricted access arterial and Pyramid Highway into a freeway going north from the McCarran intersection. On and off ramps should be designed to incorporate roundabouts or loops to avoid traffic signals.
April 24, 2008

Mr. Steve M. Cooke  
Environmental Services  
Department of Transportation  
1263 South Stewart Street  
Carson City, Nevada 89712  

RE: Pyramid Highway – US 395  

Dear Mr. Cooke:  

Thank you for the invitation to participate in the pending environmental impact statement for the Pyramid Highway and US 395 Connection. The scoping data for the proposed route and study area does not include the link between the two highways.  

We have suggested that the route map file include wildlife overlays from your GIS Shop or Washoe County Planners. Once a route or alternatives are developed, our agency can provide some assistance.  

If there are any questions or need of assistance, please contact my office at 423-3171 extension 227.  

Sincerely,  

Roy Leach  
Western Region Supervisor  

cc. Chris Hampson
April 29, 2008

Daniel Nollsch
Nevada Department of Transportation
Environmental Services Division
1263 South Stewart Street
Carson City, NV 89712

Re: SAI NV # E2008-415  Reference:

Project: Pyramid Highway / US395 Connector Project

Dear Daniel Nollsch:

The following agencies support the above referenced document as written:
Division of State Lands
State Historic Preservation Office

This constitutes the State Clearinghouse review of this proposal as per Executive Order 12372. If you have questions, please contact me at (775) 684-0209.

Sincerely,

Krista Coulter
Nevada State Clearinghouse
Appendix A:
Agency Coordination

Cooperating Agency/Participating Agency/Agency Scoping/
Technical Advisory Committee (TAC)
Nevada Division

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement Participating Agency Invitation

Mr. Mervin Wright, Chairperson
Pyramid Lake Paiute Tribe
P.O. Box 256
Nixon, NV 89424

Dear Mr. Wright:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The proposed project is located in an area that may be of interest to the Pyramid Lake Paiute Tribe. With this letter, we extend your Tribe an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your Tribe either supports the proposal or has any special expertise with respect to evaluation of the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project’s potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your Tribe’s role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.

2. Participate in coordination meetings and joint field reviews as appropriate.
3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your Tribe on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

In addition, we invite you to attend the agency scoping meeting and become a member of the Technical Advisory Committee (TAC) as described below.

Agency scoping meeting:
You are invited to attend an agency scoping meeting on April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431 (see enclosed map).

If you are unable to attend the agency scoping meeting, please note that a public information meeting will be held on April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.

TAC meeting:
Participation on the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.

Please respond to me in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If you have any questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.

Thank you for your cooperation and interest in this proposed project.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

cc: Steve Cooke, NDOT
    Sabra Gilbert-Young, NDOT
    Doug Maloy, RTC
Nevada Division

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement
Participating Agency Invitation

Mr. Arlan Melendez, Chairperson
Reno-Sparks Indian Colony
98 Colony Road
Reno, NV 89502

Dear Mr. Melendez:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The proposed project is located in an area that may be of interest to the Reno-Sparks Indian Colony (RSIC). With this letter, we extend RSIC an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that RSIC either supports the proposal or has any special expertise with respect to evaluation of the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project’s potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that RSIC’s role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.

2. Participate in coordination meetings and joint field reviews as appropriate.
3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of RSIC on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

In addition, we invite you to attend the agency scoping meeting and become a member of the Technical Advisory Committee (TAC) as described below.

**Agency scoping meeting:**
You are invited to attend an agency scoping meeting on **April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431** (see enclosed map).

If you are unable to attend the agency scoping meeting, please note that a public information meeting will be held on **April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.**

**TAC meeting:**
Participation on the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for **June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.**

Please respond to me in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If you have any questions or would like to discuss in more detail the project or our agencies’ respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.

Thank you for your cooperation and interest in this proposed project.

Sincerely,

[Signature]

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

cc: Steve Cooke, NDOT
    Sabra Gilbert-Young, NDOT
    Doug Maloy, RTC
Mr. Waldo W. Walker, Chairperson  
Washoe Tribe of Nevada and California  
919 Highway 395 South  
Gardnerville, NV 89410  

Dear Mr. Walker:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The proposed project is located in an area that may be of interest to the Washoe Tribe of Nevada and California. With this letter, we extend your Tribe an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your Tribe either supports the proposal or has any special expertise with respect to evaluation of the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project's potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your Tribe’s role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.

2. Participate in coordination meetings and joint field reviews as appropriate.
3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your Tribe on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

In addition, we invite you to attend the agency scoping meeting and become a member of the Technical Advisory Committee (TAC) as described below.

Agency scoping meeting:
You are invited to attend an agency scoping meeting on April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431 (see enclosed map).

If you are unable to attend the agency scoping meeting, please note that a public information meeting will be held on April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.

TAC meeting:
Participation or the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.

Please respond to me in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If you have any questions or would like to discuss in more detail the project or our agencies’ respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.

Thank you for your cooperation and interest in this proposed project.

Sincerely,

[Signature]
Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

cc: Steve Cooke, NDOT
Sabra Gilbert-Young, NDOT
Doug Maloy, RTC
Nevada Division

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement Participating Agency Invitation

Ms. Athena Brown, Superintendent
Bureau of Indian Affairs
311 East Washington Street
Carson City, NV 89701

Dear Ms. Brown:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The proposed project is located in an area that may be of interest to the Bureau of Indian Affairs (BIA). With this letter, we extend your agency an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your agency supports the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project's potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.

2. Participate in coordination meetings and joint field reviews as appropriate.
3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

Please respond to me in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If the BIA declines to participate, your response should state your reason for declining the invitation. Pursuant to SAFETEA-LU Section 6002, any Federal Agency that chooses to decline the invitation must specifically state that your agency:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

By this letter, FHWA requests that you review the enclosed material and advise us with your comments on potential environmental impacts. In addition, we invite you to attend the agency scoping meeting and Technical Advisory Committee (TAC) meetings as described below.

**Agency scoping meeting:**
You are invited to attend an agency scoping meeting on April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431 (see enclosed map).

If you are unable to attend the agency scoping meeting, please note that a public information meeting will be held on April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.

**TAC meeting:**
Participation on the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.

If you have any questions or would like to discuss in more detail the project or our agencies’ respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.
Thank you for your cooperation and interest in this proposed project.

Sincerely,

[Signature]

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

cc: Steve Cooke, NDOT
    Doug Maloy, RTC
Nevada Division

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement
Cooperating and Participating Agency Invitation

Don Hicks, Field Manager
Bureau of Land Management
Carson City Field Office
5665 Morgan Mill Road
Carson City, NV  89701

Dear Mr. Hicks:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The Bureau of Land Management (BLM) has been identified as an agency that has an interest in the project because a portion of the proposed project is located on public land managed by the BLM. FHWA requests the participation of the BLM as a cooperating agency in the preparation of the DEIS and FEIS, in accordance with 40 CFR 1501.6 of the Council on Environmental Quality's (CEQ) Regulations for Implementing the Procedural Provision of the National Environmental Policy Act (NEPA). As a cooperating agency, BLM would participate in public and interagency meetings and make existing baseline information available, as appropriate, during the scoping process. Per the BLM, FHWA, and NDOT Memorandum of Understanding and Operating Manual concerning Operating Procedures for Processing Federal-aid Highway Rights of Way from BLM (November 26, 2007), the BLM would use the final environmental decision document as a basis for future actions and interests in public lands.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), we also extend to the BLM an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. Participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project's potential environmental or socioeconomic impacts that
could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.

2. Participate in coordination meetings and joint field reviews as appropriate.

3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

Please respond to me in writing with an acceptance or denial of the invitation to be a cooperating and a participating agency by May 1, 2008. If the BLM declines to participate, your response should state your reason for declining the invitation. Pursuant to SAFETEA-LU Section 6002, any Federal Agency that chooses to decline the invitation must specifically state that your agency:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

By this letter, FHWA requests that you review the enclosed material and advise us with your comments on potential environmental impacts. In addition, we invite you to attend the agency scoping meeting and Technical Advisory Committee (TAC) meetings as described below.

**Agency scoping meeting:**
You are invited to attend an agency scoping meeting on **April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431** (see enclosed map).

If you are unable to attend this meeting, please note that a public information meeting will be held on **April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.**

**TAC meetings:**
Participation on the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for **June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.**
If you have any questions or would like to discuss in more detail the project or our agencies’ respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.

Thank you for your cooperation and interest in this proposed project.

Sincerely,

[Signature]

Abdelmoez A. Abdalla  
Environmental Program Manager

Enclosures

cc: Steve Cooke (NDOT)  
Doug Maloy (RTC)
Nevada Division

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement Participating Agency Invitation

Ms. Carolyn Mulvihill
Environmental Review Office
U.S. Environmental Protection Agency
Region 9
75 Hawthorne St CED-2
San Francisco, CA 94105

Dear Ms. Mulvihill:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The U.S. Environmental Protection Agency (EPA) has been identified as an agency that may have an interest in the proposed project because of its jurisdictional responsibilities and special expertise that may be applied to this project. With this letter, we extend your agency an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your agency supports the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project’s potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
2. Participate in coordination meetings and joint field reviews as appropriate.

3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

Please respond to me in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If the EPA declines to participate, your response should state your reason for declining the invitation. Pursuant to SAFETEA-LU Section 6002, any Federal Agency that chooses to decline the invitation must specifically state that your agency:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

By this letter, FHWA requests that you review the enclosed material and advise us with your comments on potential environmental impacts. In addition, we invite you to attend the agency scoping meeting and Technical Advisory Committee (TAC) meetings as described below.

**Agency scoping meeting:**
You are invited to attend an agency scoping meeting on **April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431** (see enclosed map).

If you are unable to attend the agency scoping meeting, please note that a public information meeting will be held on **April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.**

**TAC meeting:**
Participation on the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for **June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.**

If you have any questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.
Thank you for your cooperation and interest in this proposed project.

Sincerely,

[Signature]

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

cc: Steve Cooke, NDOT
    Doug Maloy, RTC
Nevada Division

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement Participating Agency Invitation

Mr. Sandro Amaglio, Region IX Environmental Officer
Federal Emergency Management Agency
1111 Broadway, Suite 1200
Oakland, CA 94607

Dear Mr. Amaglio:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The Federal Emergency Management Agency has been identified as an agency that may have an interest in the proposed project because of its jurisdictional responsibilities and special expertise that may be applied to this project. With this letter, we extend your agency an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your agency supports the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project’s potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your agency’s role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
2. Participate in coordination meetings and joint field reviews as appropriate.

3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

Please respond to me in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If the Federal Emergency Management Agency declines to participate, your response should state your reason for declining the invitation. Pursuant to SAFETEA-LU Section 6002, any Federal Agency that chooses to decline the invitation must specifically state that your agency:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

By this letter, FHWA requests that you review the enclosed material and advise us with your comments on potential environmental impacts. In addition, we invite you to attend the agency scoping meeting and Technical Advisory Committee (TAC) meetings as described below.

**Agency scoping meeting:**
You are invited to attend an agency scoping meeting on **April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431** (see enclosed map).

If you are unable to attend the agency scoping meeting, please note that a public information meeting will be held on **April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.**

**TAC meeting:**
Participation on the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for **June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.**

If you have any questions or would like to discuss in more detail the project or our agencies’ respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.
Thank you for your cooperation and interest in this proposed project.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

cc: Steve Cooke, NDOT
    Doug Maloy, RTC
Nevada Division

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement Participating Agency Invitation

Ms. Jody Brown, Deputy Field Supervisor
Fish and Wildlife Service
Nevada Fish and Wildlife Office
1340 Financial Blvd., #234
Reno, NV 89502

Dear Ms. Brown:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen's Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The U.S. Fish and Wildlife Service (USFWS) has been identified as an agency that may have an interest in the proposed project because of its jurisdictional responsibilities and special expertise that may be applied to this project. With this letter, we extend your agency an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your agency supports the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project's potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
2. Participate in coordination meetings and joint field reviews as appropriate.

3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

Please respond to me in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If the USFWS declines to participate, your response should state your reason for declining the invitation. Pursuant to SAFETEA-LU Section 6002, any Federal Agency that chooses to decline the invitation must specifically state that your agency:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

By this letter, FHWA requests that you review the enclosed material and advise us with your comments on potential environmental impacts. In addition, we invite you to attend the agency scoping meeting and Technical Advisory Committee (TAC) meetings as described below.

**Agency scoping meeting:**
You are invited to attend an agency scoping meeting on **April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431** (see enclosed map).

If you are unable to attend the agency scoping meeting, please note that a public information meeting will be held on **April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.**

**TAC meeting:**
Participation on the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for **June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.**

If you have any questions or would like to discuss in more detail the project or our agencies’ respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.
Thank you for your cooperation and interest in this proposed project.

Sincerely,

[Signature]

Abdelmoez A. Abdalla  
Environmental Program Manager

Enclosures

cc: Steve Cooke, NDOT  
    Doug Maloy, RTC
Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement
Participating Agency Invitation

Mr. Kevin Roukey, Chief
U.S. Army Corps of Engineers
Reno Regulatory Field Office
300 Booth Street, Room 2103
Reno, NV 89509

Dear Mr. Roukey:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The U.S. Army Corps of Engineers (USACE) has been identified as an agency that may have an interest in the proposed project because of its jurisdictional responsibilities and special expertise that may be applied to this project. With this letter, we extend your agency an invitation to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your agency supports the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project's potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
2. Participate in coordination meetings and joint field reviews as appropriate.

3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

For your review, we have included a copy of the coordination plan developed for this project. The coordination plan details the elements and expectations discussed in this letter, and lists the other agencies who have been invited to participate in this process.

Please respond to me in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If the USACE declines to participate, your response should state your reason for declining the invitation. Pursuant to SAFETEA-LU Section 6002, any Federal Agency that chooses to decline the invitation must specifically state that your agency:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

By this letter, FHWA requests that you review the enclosed material and advise us with your comments on potential environmental impacts. In addition, we invite you to attend the agency scoping meeting and Technical Advisory Committee (TAC) meetings as described below.

Agency scoping meeting:
You are invited to attend an agency scoping meeting on April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431 (see enclosed map).

If you are unable to attend the agency scoping meeting, please note that a public information meeting will be held on April 15, 2008 from 4:00 p.m. to 7:00 p.m. at the Lazy 5 Community Center, 7100 Pyramid Highway, Sparks, Nevada.

TAC meeting:
Participation on the TAC will enable you to receive periodic project updates and work collaboratively with local, state, and federal stakeholders toward a successful project. The TAC is scheduled to meet on the 3rd Thursday of every other month. The TAC meeting in June is scheduled for June 19, 2008 from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.

If you have any questions or would like to discuss in more detail the project or our agencies’ respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 687-1231.
Thank you for your cooperation and interest in this proposed project.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager
April 4, 2008

Kenneth E. Mayer  
Director  
Nevada Department of Wildlife  
1100 Valley Road  
Reno, NV 89512

Dear Mr. Mayer:

The Nevada Department of Transportation (NDOT), in cooperation with the Federal Highway Administration (FHWA) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The Department of Conservation and Natural Resources has been identified as an agency that may have an interest in the proposed project. With that in mind, we are extending this invitation to your agency to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your agency supports the proposed project.

Pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the proposed project’s potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project. We suggest that your agency’s role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.

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3. Provide timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

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In addition, we invite you to attend the agency scoping meeting and become a member of the Technical Advisory Committee (TAC) as described below.

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An agency scoping meeting will be conducted on **April 16th, 2008 from 9:00 a.m. to 11:00 a.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431** (see enclosed map).

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Please respond in writing with an acceptance or denial of the invitation to be a participating agency by May 1, 2008. If you have any questions or would like to discuss the project in more detail or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact me at (775) 888-7013.

Thank you for your cooperation and interest in this proposed project.

Sincerely,

Steve M. Cooke, P.E.
Chief, Environmental Services Division

Enclosures

cc: Abdelmoez A. Abdalla, Environmental Program Manager (FHWA)
    Doug Maloy, Project Manager (RTC)
April 4, 2008

Ronald James
State Historic Preservation Officer
Nevada State Historic Preservation Office
1000 North Stewart Street
Carson City, NV 89701

Dear Mr. James:

The Nevada Department of Transportation (NDOT), in cooperation with the Federal Highway Administration (FHWA) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

The Department of Conservation and Natural Resources has been identified as an agency that may have an interest in the proposed project. With that in mind, we are extending this invitation to your agency to become a participating agency with FHWA, NDOT, and RTC in the development of the EIS for the subject project. This designation does not imply that your agency supports the proposed project.

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Thank you for your cooperation and interest in this proposed project.

Sincerely,

Steve M. Cooke, P.E.
Chief, Environmental Services Division

Enclosures

cc: Abdelmoez A. Abdalla, Environmental Program Manager (FHWA)
    Doug Maloy, Project Manager (RTC)
April 4, 2008

Mr. Allen Biaggi
Director
Department of Conservation and Natural Resources
901 South Stewart Street, Suite 5001
Carson City, NV 89701

Dear Mr. Biaggi:

The Nevada Department of Transportation (NDOT), in cooperation with the Federal Highway Administration (FHWA) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

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Thank you for your cooperation and interest in this proposed project.

Sincerely,

Steve M. Cooke, P.E.
Chief, Environmental Services Division

Enclosures

cc: Abdelnourz A. Abdalla, Environmental Program Manager (FHWA)
    Doug Maloy, Project Manager (RTC)
April 4, 2008

Bob Cashell
Mayor
City of Reno
P.O. Box 1900
Reno, NV 89505

Dear Mayor Cashell:

The Nevada Department of Transportation (NDOT), in cooperation with the Federal Highway Administration (FHWA) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

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Thank you for your cooperation and interest in this proposed project.

Sincerely,

Steve M. Cooke, P.E.
Chief, Environmental Services Division

Enclosures

cc: Abdelmoez A. Abdalla, Environmental Program Manager (FHWA)
    Doug Maloy, Project Manager (RTC)
April 4, 2008

Robert Larkin, Chair
Washoe County Commission
1001 E. 9th Street
Reno, NV 89512

Dear Mr. Larkin:

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Thank you for your cooperation and interest in this proposed project.

Sincerely,

[Signature]

Steve M. Cooke, P.E.
Chief, Environmental Services Division

Enclosures

cc: Abdelmoez A. Abdalla, Environmental Program Manager (FHWA)
Doug Maloy, Project Manager (RTC)
April 4, 2008

Geno Martini, Mayor
City of Sparks
431 Prater Way
P.O. Box 857
Sparks, NV 89432

Dear Mayor Martini:

The Nevada Department of Transportation (NDOT), in cooperation with the Federal Highway Administration (FHWA) and the Washoe County Regional Transportation Commission (RTC), is initiating an environmental impact statement (EIS) for the proposed Pyramid Highway–US 395 Connection project. The purpose of the proposed project is to address regional mobility, congestion, and safety challenges faced by motorists and pedestrians that travel Pyramid Highway to Spanish Springs and Pyramid Lake. The proposed study area extends 7.7 miles along Pyramid Highway from Queen’s Way north to Calle de la Plata Drive. It also includes an area extending 4.5 miles west from Vista Boulevard to US 395 near the Parr/Dandini Interchange. A map of the proposed study area is included for your review.

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Thank you for your cooperation and interest in this proposed project.

Sincerely,

Steve M. Cooke, P.E.
Chief, Environmental Services Division

Enclosures

cc: Abdelmoez A. Abdalla, Environmental Program Manager (FHWA)
    Doug Maloy, Project Manager (RTC)
Federal Highway Administration
Attn: Mr. Abdelmoez A. Abdalla
705 North Plaza St., Suite 220
Carson City, NV 89701

Dear Mr. Abdalla,

The Bureau of Land Management (BLM), Carson City Field Office has received your letter requesting BLM participation as a cooperating agency in preparation of an environmental impact statement (EIS) for the proposed Pyramid Highway – U.S. 395 Connection Project. As per your map, BLM has management responsibilities for public land within the study area and this office accepts the opportunity to participate in the EIS process. Representatives from this office will attend the agency scoping meeting on April 16, 2008 in Sparks.

The contact personnel for this project are JoAnn Hufnagle (Supervisory Realty Specialist) at 885-6144 or Terri Knutson (Planning & Environmental Coordinator) at 885-6156.

Sincerely,

Donald T. Hicks
Manager,
Carson City Field Office
From: Abdalla, Abdelmoez  
Sent: Monday, April 14, 2008 6:00 PM  
To: 'Scott Nebesky'; Gilbert-Young, Sabra E  
Cc: Nollisch, Michael (Daniel); 'Caviola, James'; scooke@dot.state.nv.us; Bennett, Rebecca (NV); Visser, Hannah  
Subject: RE: Pyramid Hwy Interconnector & RSIC

Scott,

Thanks for accepting our invitation to become a participating agency with this project. FHWA is looking forward to your assistance with different aspects of this project.

Del

Abdelmoez A. Abdalla, Ph.D.  
Environmental Program Manager  
Federal Highway Administration-Nevada Division  
Telephone: (775) 687-1231  
Fax: (775)687-3803  
E-mail: abdelmoez.abdalla@fhwa.dot.gov

From: Scott Nebesky [mailto:snebesky@rsic.org]  
Sent: Monday, April 14, 2008 2:10 PM  
To: Gilbert-Young, Sabra E; Abdalla, Abdelmoez  
Cc: Nollisch, Michael (Daniel)  
Subject: RE: Pyramid Hwy Interconnector & RSIC

Thank you for summarizing our discussion this morning. The Colony will participate in as many meeting as necessary and certainly appreciates the early notice and invitation. In fact, I attended the Stakeholders Working Group on April 7th.

9/24/2008
In response to your letter dated April 1, 2008, please accept this email as notice of the Colony’s interest to become a participating agency.

Scott A. Nebesky, AICP
Planning Director
Reno-Sparks Indian Colony
1937 Prosperity St
Reno NV 89502
Office 775.785.1363
Cell: 775.221.1585
Fax 775.789.5652
Email snebesky@rsic.org

-----Original Message-----
From: Gilbert-Young, Sabra E [mailto:SGilbert-Young@dot.state.nv.us]
Sent: Monday, April 14, 2008 12:24 PM
To: Abdalla, Abdelmoez
Cc: Scott Nebesky; Nollschen, Michael (Daniel)
Subject: Pyramid Hwy Interconnector & RSIC

Hi Del,
I just got off of the phone with Scott Nebesky at the Reno-Sparks Indian Colony regarding the Pyramid Interconnector project. This conversation was in response to my request for information about if there was any tribal land involved (per your phone call from BIA last week). I am cc'ing Scott this email for his information.

Scott said that the project itself wasn’t touching the Hungry Valley portion of RSIC. But that RSIC has a 24 acre economic development parcel on the corner of Eagle Canyon Dr. and Pyramid Hwy (SW corner, except the 7-11 store). It is a long linear parcel fronting Pyramid Hwy that currently is zoned for general commercial and has several access points. Scott’s immediate concerns are that:

- All but one access point would be eliminated by this project (severely hampering the economic viability of the parcel)
- Possible right of way would be needed by this project for an off ramp (potential killing the economic viability of the parcel)

Scott asked if there was an opportunity to swap this parcel for other federally owned land.

Scott stated verbally that RSIC wants to become a participating agency for the EIS/project. He intends to provide the written statement to you via email. Please note that Scott is extremely busy individual and is a bit concerned about the time commitment that the meeting schedule for this project requires (SWG, TAC, etc.). Is there a way that he could get all of the meeting dates well in advance so he has time to adjust his schedule?

Should you have any other questions I should be in the office for the remainder of today, Thursday, and Friday. (I’ll be in all day meetings on Tuesday and Wednesday).

Sabra E. Gilbert-Young, RPA
Native American Consultation Coordinator
Environmental Services Division
Nevada Department of Transportation
1263 S. Stewart Street
Carson City, NV 89712

9/24/2008
This communication, including any attachments, may contain confidential information and is intended only for the individual or entity to whom it is addressed. Any review, dissemination or copying of this communication by anyone other than the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and delete all copies of the original message.
April 18, 2008

Steve M. Cooke, P.E.
Chief, Environmental Services Division
Nevada Department of Transportation
1263 South Stewart Street
Carson City, Nevada 89712

Environmental Impact Statement

Dear Mr. Cooke:

The City of Reno is excited that the Nevada Department of Transportation is initiating an environmental impact statement (EIS) for the proposed improvement project on Pyramid Highway, which may include a connector between US 395 and the Pyramid Highway. Please accept this letter as Reno’s request to be designated as a participating agency in the development of the EIS for this project. As a participating agency, Reno will be able to fulfill the roles outlined in your April 4, 2008 letter to Mayor Bob Cashell of Reno.

The City looks forward to participating in the improvement and development of transportation facilities in this critical area of the Truckee Meadows. Please contact me at 326-6311 if you have any questions.

Best regards,

John Toth, P.E.
Assistant Director

cc:

John Hester
Auro Majumdar, Public Works
Doug Maloy, RTC
April 18, 2008

Doug Maloy, P.E.
Regional Transportation Commission
1105 Terminal Way Suite 108
Reno, NV 89502

Subject: Pyramid Highway – US 395 Connection

Dear Mr. Maloy, P.E.:

Washoe County accepts the invitation to be a Participating Agency.

Sincerely,

DAVID T. PRICE, P.E., COUNTY ENGINEER

Clara Lawson, P.E., Licensed Engineer
April 21, 2008

Mr. Steven M. Cooke, P.E., Chief
Environmental Services Division
1263 S. Stewart Street
Carson City, NV 89712

Re: Pyramid Highway – US 395 Connection Environmental Impact Statement Technical Advisory Committee

Dear Mr. Cooke:

Thank you for the invitation to participate in the environmental process for the Pyramid Highway – US 395 Connection project. The City of Sparks is excited to actively participate throughout the process and its Technical Advisory Committee.

Please contact me at (775) 353-2304 with any questions.

Sincerely,

Neil C. Krutz, P.E.
Community Development Director

cc: Mr. Doug Maloy, P.E., RTC Project Manager
Mr. Abdelmoez A. Abdalla
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Dear Mr. Abdalla:

This is in response to your invitation to the U.S. Fish and Wildlife Service (Service) to become a participating agency in the development of an Environmental Impact Statement (EIS) for the proposed Pyramid Highway-U.S. 395 Connection project. This project will involve improvements to Pyramid Highway from Queen’s Way north to Calle de la Plata Drive, a distance of approximately 8 miles. It also involves providing a connection from Vista Boulevard to U.S. 395 at the Parr/Dandini Interchange. While we appreciate your invitation to participate under Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users, we are unable to accept at this time due to limited resources and other higher priority, court-ordered actions.

We would like to take this opportunity to reiterate Service comments provided at the April 16, 2008, meeting held at the Nevada Department of Transportation’s District 2 Office in Reno. We understand that this project is in the early stages of the planning process and that the current study area boundary may change as the range of alternatives is further developed. As indicated at the meeting, we are concerned about potential impacts to the Carson wandering skipper (CWS) (*Pseudocopaeodes eumus obscurus*), an endangered species found at two sites in Spanish Springs and Warm Springs Valleys. These sites occur on private and federally-administered lands. These sites are relatively small in size and any direct and indirect impacts will be dependent upon alternative routes proposed.

Though we are unable to formally engage in this process as a participating agency, we do not relinquish our responsibilities for federally-listed threatened and endangered species under section 7 of the Endangered Species Act of 1973, as amended. We also may provide comments on the draft EIS as appropriate in the future.
We look forward to further discussions related to the Pyramid Highway-U.S. 395 Connection project. If you have any questions, please contact me or Marcy Haworth at (775) 861-6300.

Sincerely,

[Signature]

Robert D. Williams
Field Supervisor
April 30, 2008

Abdelmoez A. Abdalla  
Environmental Program Manager  
Federal Highway Administration  
705 N. Plaza, Suite 220  
Carson City, NV 89701

Subject: Response to Participating Agency Request for the Proposed Improvements to Pyramid Way and the Proposal for a New Corridor from Vista Boulevard to US-395, Washoe County, Nevada

Dear Mr. Abdalla:

We are writing in response to your April 1, 2008 letter (HENV-NV US395) inviting the U.S. Environmental Protection Agency (EPA) to become a Participating Agency for the Proposed Improvements to Pyramid Way and the Proposal for a New Corridor from Vista Boulevard to US-395, Washoe County, Nevada. The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Washoe County Regional Transportation Commission (RTC) will prepare a Draft Environmental Impact Statement (DEIS) for the project under the National Environmental Policy Act. On March 31, 2008, EPA provided scoping comments for this project in response to the Federal Register Notice published on February 29, 2008.

EPA accepts FHWA's invitation to become a "Participating Agency" as defined in Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). We look forward to working with FHWA to ensure that the SAFETEA-LU implementation procedures assist both our agencies in meeting our statutory missions.

Section 6002 requires that the lead agency provide an opportunity for involvement by participating agencies in defining the Purpose and Need and in determining the Range of Alternatives for a project as early as practicable during the environmental review process. Specifically, the involvement of participating agencies early during the development of Purpose and Need should inform the scope and development of project alternatives. EPA recommends that FHWA request participating agency feedback on the Purpose and Need before extensive effort is expended on developing a Range of Alternatives so that agency input can help shape
alternative development. EPA is also available to assist in the determination of the methodologies to be used and could provide input to FHWA on the level of detail required for the technical studies to inform the development of the DEIS.

This project may meet the criteria for coordination under the National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects Memorandum of Understanding (NEPA/404 MOU). The NEPA/404 MOU includes specific concurrence points to assist in developing the DEIS and involves active participation in meetings and document reviews. It applies to transportation projects that have five or more acres of permanent impacts to waters of the United States and require EIS preparation. We encourage FHWA to contact the NEPA/404 signatory agencies once more information about the potential impact to waters of the United States is available in order to initiate coordination under the NEPA/404 MOU, if applicable, and coordinate with the Section 6002 process.

The Coordination Plan for this project includes an anticipated schedule which notes that certain milestone reviews, such as Purpose and Need and Range of Alternatives will be met at scoping or other meetings. Since EPA’s involvement in meetings may be limited due to resource constraints, we request that project documents needing interagency review and comment be submitted to us with a 30-day review period.

We appreciate FHWA’s interest in working with EPA and look forward to participating in the project’s DEIS development. EPA’s participation as a Participating Agency does not constitute formal or informal approval of any part of this project under any statute administered by EPA, nor does it limit in any way EPA’s independent review of the Draft and Final EISs pursuant to Section 309 of the Clean Air Act. Please contact Carolyn Mulvihill (415-947-3554 or mulvihill.carolyn@epa.gov) for further coordination on this project.

Sincerely,

[Signature]

Nova Blaezj, Manager
Environmental Review Office

cc: Steve Cooke, NDOT
Douglas Maloy, RTC
Steve Roberts, U.S. Army Corps of Engineers
August 28, 2008

Mr. Shaun Carey
Sparks City Manager
c/o Jon Ericson
City of Sparks Public Works
P.O. Box 857
Sparks, NV 89432


Dear Mr. Ericson:

On April 1, 2008, the Nevada Department of Transportation (NDOT) sent you a letter inviting you to serve as a participating agency on the Pyramid Highway–US 395 Connection Environmental Impact Statement (EIS). NDOT received your letter dated April 25, 2008 agreeing to serve as a participating agency on the project. As you may know, the Washoe County Regional Transportation Commission (RTC) serves as a co-lead agency with NDOT on the EIS.

Pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies have an opportunity for involvement in specific milestone reviews. This letter includes three milestone review items (see attached): Purpose and Need Statement, Alternative Screening Methods, and Range of Alternatives. Please provide any comments on these items by September 29, 2008. Please note the Range of Alternatives would be revisited as necessary based on any revisions to the Purpose and Need Statement due to participating agency comments.

Page 2 of our April 1, 2008 letter indicated that your agency’s role in the development of the above project should include providing “timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency...” Since the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users did not amend federal policy regarding agency review of pre-draft environmental documents, this statement was incorrect. As always, your review of the Draft and Final EISs will be encouraged.

As a reminder, a project TAC meeting is scheduled for September 18, 2008, from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.
Pyramid Highway–US 395 Connection EIS  
Participating Agency Review of Purpose and Need Statement, Alternatives Screening, and Range of Alternatives

Mr. Shaun Carey  
c/o Jon Ericson  
August 28, 2008  
Page 2 of 2

If you have any questions, please contact me at (775) 335-1865. Thank you for your cooperation and interest in this proposed project.

Sincerely,

Doug Maloy, P.E.  
Project Manager

Enclosures

cc: Abdelmoez A. Abdalla, Environmental Program Manager (FHWA)  
Steve M. Cooke, P.E. Chief, Environmental Services Division (RTC)  
Jim Clarke, Pyramid Team  
File
August 28, 2008

Ms. Katy Singlaub
Washoe County Manager
c/o Sandra Monsalve
Washoe County Planning
1001 E Ninth Street, Bldg. A
Reno, NV  89520

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement
Participating Agency Review of Purpose and Need Statement, Alternatives
Screening, and Range of Alternatives

Dear Ms. Monsalve:

On April 1, 2008, the Nevada Department of Transportation (NDOT) sent you a letter inviting you to serve as a participating agency on the Pyramid Highway–US 395 Connection Environmental Impact Statement (EIS). NDOT received your letter dated April 25, 2008 agreeing to serve as a participating agency on the project. As you may know, the Washoe County Regional Transportation Commission (RTC) serves as a co-lead agency with NDOT on the EIS.

Pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies have an opportunity for involvement in specific milestone reviews. This letter includes three milestone review items (see attached): Purpose and Need Statement, Alternative Screening Methods, and Range of Alternatives. Please provide any comments on these items by September 29, 2008. Please note the Range of Alternatives would be revisited as necessary based on any revisions to the Purpose and Need Statement due to participating agency comments.

Page 2 of our April 1, 2008 letter indicated that your agency’s role in the development of the above project should include providing “timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency. . .” Since the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users did not amend federal policy regarding agency review of pre-draft environmental documents, this statement was incorrect. As always, your review of the Draft and Final EISs will be encouraged.

As a reminder, a project TAC meeting is scheduled for September 18, 2008, from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.
If you have any questions, please contact me at (775) 335-1865. Thank you for your cooperation and interest in this proposed project.

Sincerely,

Doug Maloy, P.E.
Project Manager

Enclosures

cc: Abdelmoez A. Abdalla, Environmental Program Manager (FHWA)
    Steve M. Cooke, P.E. Chief, Environmental Services Division (RTC)
    Jim Clarke, Pyramid Team
    File
August 28, 2008

Mr. Charles McNeely
Reno City Manager
c/o John Toth
City of Reno Planning
1 E. First Street
Post Office Box 1900
Reno, NV 89505

Subject: Pyramid Highway–US 395 Connection Environmental Impact Statement
Participating Agency Review of Purpose and Need Statement, Alternatives Screening, and Range of Alternatives

Dear Mr. Toth:

On April 1, 2008, the Nevada Department of Transportation (NDOT) sent you a letter inviting you to serve as a participating agency on the Pyramid Highway–US 395 Connection Environmental Impact Statement (EIS). NDOT received your letter dated April 25, 2008 agreeing to serve as a participating agency on the project. As you may know, the Washoe County Regional Transportation Commission (RTC) serves as a co-lead agency with NDOT on the EIS.

Pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), participating agencies have an opportunity for involvement in specific milestone reviews. This letter includes three milestone review items (see attached): Purpose and Need Statement, Alternative Screening Methods, and Range of Alternatives. Please provide any comments on these items by September 29, 2008. Please note the Range of Alternatives would be revisited as necessary based on any revisions to the Purpose and Need Statement due to participating agency comments.

Page 2 of our April 1, 2008 letter indicated that your agency’s role in the development of the above project should include providing “timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency . . .” Since the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users did not amend federal policy regarding agency review of pre-draft environmental documents, this statement was incorrect. As always, your review of the Draft and Final EISs will be encouraged.
As a reminder, a project TAC meeting is scheduled for September 18, 2008, from 1:30 p.m. to 3:30 p.m. at the NDOT District 2 Office, 310 Galletti Way Sparks, NV 89431.

If you have any questions, please contact me at (775) 335-1865. Thank you for your cooperation and interest in this proposed project.

Sincerely,

Doug Maloy, P.E.
Project Manager

Enclosures

cc: Abdelmoez A. Abdalla, Environmental Program Manager (FHWA)
    Steve M. Cooke, P.E. Chief, Environmental Services Division (RTC)
    Jim Clarke, Pyramid Team
    File
Abdelmoez A. Abdalla
Environmental Program Manager
Federal Highway Administration
705 N. Plaza, Suite 220
Carson City, NV 89701

Subject: Comments on Draft Purpose and Need Statement, Draft Methodology for Screening Alternatives, and Draft Initial Range of Alternatives for the Pyramid Highway – US 395 Connection Project, Washoe County, Nevada

Dear Mr. Abdalla:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Purpose and Need Statement, Draft Methodology for Screening Alternatives, and Draft Initial Range of Alternatives for the Pyramid Highway – US 395 Connection Project, Washoe County, Nevada. This letter provides feedback on these documents in accordance with Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). EPA is a Participating Agency (as defined in SAFETEA-LU) for this project and previously provided comments on the February 29, 2008 Notice of Intent (NOI) for the project in March 31, 2008 letter. Our comments below are in concert with the formal scoping comments in our March 2008 letter.

Purpose and Need

The Draft Purpose and Need Statement states the following purposes for the project:

- Provide improvements to serve existing and future growth areas;
- Provide direct and efficient travel routes to address existing travel inefficiencies;
- Alleviate existing congestion problems on Pyramid Highway;
- Improve existing and future safety issues on Pyramid Highway; and
- Respond to regional and local plans.

EPA has the following comments on these purposes:

- The Purpose and Need Statement quotes population growth figures from the U.S. Census Bureau and the Sparks Master Plan, and forecasts of population and
employment growth by the Regional Transportation Commission (RTC). It also mentions figures of “approved development” of residential units and commercial space. In preparing the draft environmental impact statement (DEIS), these figures should be verified to ensure that the latest growth assumptions are included in forecasts and that estimates of planned development are based on up-to-date information. Recent economic factors, such as the downturn in the housing market, credit crisis, and increased price of gasoline, may have a slowing impact on growth in the area. The impact of these recent events on previous growth projections should be considered, and their relevance to the project need should be discussed in future versions of the Purpose and Need Statement and in the DEIS.

- The statement, “[t]avel demand for the existing and forecasted growth far exceeds existing capacity” should be supported by quantitative information.

- The crash rates for Pyramid Highway should be provided in the context of statewide or national average rates. While it is important to note that rates have increased in recent years, it is also important to know how these rates compare with averages.

- The Purpose and Need Statement states that “[i]mprovements in the study area are intended to work in concert with other RTP projects” including the Pyramid Way/McCarran Boulevard intersection. EPA previously provided scoping comments on the environmental review process for the proposed intersection project. The study area and some of the alternatives being considered for this project appear to imply that the intersection project may be subsumed into this project. If the environmental process for the intersection will be accomplished through this process, this should be clarified in future project documents.

- The last listed purpose, “[r]espond to regional and local plans” should include a phrase such as “where feasible and in compliance with Federal and state regulations.” Responding to or providing consistency with regional and local plans should not limit the range of alternatives considered to fulfill transportation needs.

Draft Methodology for Screening Alternatives

The Draft Methodology for Screening Alternatives states that “[p]roject evaluation criteria and measures of effectiveness will be developed based on the Purpose and Need of the project, design guidelines, environmental resources, community input, and project goals.” The evaluation criteria and measures of effectiveness that have been, or will be, used in the screening of alternatives should be shared with EPA and other participating agencies. The Draft Initial Range of Alternatives document identifies an alternative that was chosen as the preferred alternative in the Corridor Management Plan (CMP), but it is unclear what level(s) of screening has taken place in the environmental review process. EPA would like to receive more detailed information about which criteria and measures were, or will be, used at each screening level so that we can provide meaningful feedback on the screening process.

Draft Initial Range of Alternatives

As with the Draft Methodology, EPA would like to receive more information on the range of alternatives in order to provide more meaningful feedback. While we appreciate the presentation of the broad initial range of alternatives, we would like an opportunity to review the
range of alternatives that meet the project's purpose and need and will be considered for review in the DEIS. It appears that some of the alternatives in the Draft Initial Range do not actually fulfill the purpose and need of the project. The document also states that some of the alternatives were "screened" during the CMP process due to various factors, and that others are included as "element[s] of the final package" but it is not clear whether these statements refer just to inclusion in the CMP, or the future DEIS.

Thank you for requesting our comments on these documents. Please contact me at 415-947-3554 or mulvihill.carolyn@epa.gov with any questions related to the comments in this letter. We look forward to reviewing future drafts of these documents and the DEIS.

Sincerely,

Carolyn Mulvihill
Environmental Review Office

cc: Steve Cooke, Nevada Department of Transportation
    Doug Maloy, Regional Transportation Commission
    Steve Roberts, U.S. Army Corps of Engineers
    Selena Werdon, U.S. Fish and Wildlife Service
September 09, 2008

Doug Maloy, P.E.
Regional Transportation Commission
P.O. Box 30002
Reno, Nevada 89520

Pyramid Highway-US 395 Connection

Dear Mr. Maloy:

The City of Reno is pleased to be a participating agency for the environmental impact statement for the above project. The City has reviewed the three milestone documents, and has the following comments:

Draft Purpose and Need Elements

Second need on page 1: first sentence should be expanded to state that there are no continuous east-west collector or arterial streets north of McCarran Boulevard in the Level 1 Study Area.

Draft Methodology for Screening Alternatives

1. Step 1 should include cost as an evaluation criterion, as step 3 lists exorbitant costs as a fatal flaw.

2. At what point in the screening process will public input be sought and considered?

Draft Initial Range of Alternatives

1. Alternative S-4. Will the regional shared use path be grade separated at major intersections?
2. Alternative S-6. The cost/benefit analysis of establishing and maintaining a region wide, coordinated traffic signal system akin to the FAST system in the Las Vegas Valley should be part of this alternative.

3. Alternative T-1. Queue jumps and transit signal prioritization are listed as features of bus rapid transit. The impacts to capacity on the street network affected by these features, and to air quality need to be quantified and analyzed.

4. Alternative H-1. Would existing intersections be limited to right turns in and out only?

5. All alternatives where Pyramid is not recommended for upgrade to freeway status: Will Pyramid be widened as a surface street?

**Lane Type Options**

Alternative L-4. Use of reversible lanes will eliminate exclusive left turn lanes at intersections. Any proposed use of this concept should analyze the impacts of the loss of left turn movements to street network capacity and crash rates.

Please contact me at 326-6311 if you have any questions.

Best regards,

John Toth, P.E.
Assistant Director

cc:
Auro Majumdar, Public Works
Ms. Athena Brown, Superintendent  
Bureau of Indian Affairs  
311 East Washington Street  
Carson City, Nevada 89701

Subject: Pyramid Highway-US 395 Connection Environmental Impact Statement  
Cooperating Agency Invitation

Dear Ms. Brown:

As you know, the Bureau of Indian Affairs (BIA) is serving as a participating agency on the Pyramid Highway-US 395 Connection Environmental Impact Statement (EIS) study. Following discussions in our January 31, 2012 meeting, FHWA agreed that BIA’s involvement as a cooperating agency on this project would prove beneficial in the continued coordination with the Reno-Sparks Indian Colony (RSIC) regarding potential impacts to the RSIC parcel located at Eagle Canyon Road and Pyramid Highway, and identification of avoidance and mitigation measures. Therefore, the FHWA requests the participation of the BIA as a cooperating agency in the preparation of the DEIS and FEIS, in accordance with 40 CFR 1501.6 of the Council on Environmental Quality’s (CEQ) Regulations for Implementing the Procedural Provision of the National Environmental Policy Act (NEPA).

A cooperating agency is any federal agency, other than the lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternatives. Cooperating agencies have a higher degree of authority, responsibility, and involvement in the environmental review process than participating agencies.

In addition to the BIA’s involvement to date, per 40 CFR 1501.6, as a cooperating agency the BIA would:

- Assume on request of the lead agency (FHWA) responsibility for developing information and preparing environmental analyses including portions of the environmental impact statement concerning which the cooperating agency has special expertise.

- Make available staff support at the lead agency’s request to enhance the latter’s interdisciplinary capability.

- Use their own funds
Please respond with your acceptance of your role as a cooperating agency at your earliest convenience.

I look forward to your continued participation in this proposed project.

Sincerely,

[Signature]

Abdelmoez A. Abdalla
Environmental and Research Program Manager

cc: Chris young, NDOT
    Sabra Gilbert-Young, NDOT
    Andrew Soderborg, FHWA
Mr. Arlan Melendez, Chairperson  
Reno-Sparks Indian Colony  
98 Colony Road  
Reno, Nevada 89502

Subject: Pyramid Highway-US 395 Connection Environmental Impact Statement, Cooperating Agency Invitation

Dear Mr. Melendez:

The Reno-Sparks Indian Colony (RSIC) is serving as a participating agency with the Federal Highway Administration (FHWA) on the Pyramid Highway-US 395 Connection Environmental Impact Statement (EIS) study. FHWA is also involved in Government-to-Government consultation with the RSIC on this project. In those roles, the RSIC has been involved in the development of the EIS and consultation regarding potential impacts to the RSIC’s property located at Eagle Canyon Road and Pyramid Highway. Following discussions in our January 31, 2012 meeting, FHWA agreed that the RSIC’s involvement as a cooperating agency on this project would prove beneficial in our continued coordination regarding impacts to the RSIC parcel and identification of avoidance and mitigation measures. Therefore, FHWA respectfully requests the participation of the RSIC as a cooperating agency in the preparation of the DEIS and FEIS, in accordance with 40 CFR 1501.6 and 1508.5 of the Council on Environmental Quality’s (CEQ) Regulations for Implementing the Procedural Provision of the National Environmental Policy Act (NEPA).

A cooperating agency is any federal agency, other than the lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternatives. When the effects are on tribal lands, then a Native American Tribe can also be a cooperating agency by agreement with the lead federal agency. Cooperating agencies have a higher degree of authority, responsibility, and involvement in the environmental review process than participating agencies.

In addition to the RSIC’s involvement to date, per 40 CFR 1501.6, as a cooperating agency the RSIC would:

- Assume on request of the lead agency (FHWA) responsibility for developing information and preparing environmental analyses including portions of the environmental impact statement concerning which the cooperating agency has special expertise.
• Make available staff support at the lead agency's request to enhance the latter's interdisciplinary capability.

• Normally use their own funds.

By seeking RSIC status as a cooperating agency, FHWA recognizes the unique standing the Colony has compared to other project stakeholders but we will not seek to unduly burden RSIC staff in meeting the responsibilities of a cooperating agency as noted above. Please respond with your acceptance of your role as a cooperating agency at your earliest convenience.

I look forward to continued consultation with the RSIC on this proposed project.

Sincerely,

A.A. Abdalla

Abdelmoez A. Abdalla
Environmental and Research Program Manager

cc: Chris young, NDOT
    Sabra Gilbert-Young, NDOT
    Andrew Soderborg, FHWA
Dr. Abdelmoez A. Abdalla  
Environmental and Research Program Manager  
U. S. Department of Transportation  
Federal Highway Administration – Nevada Division  
705 N. Plaza St. Ste. 220  
Carson City, NV 89701

Dear Dr. Abdalla:

The Bureau of Indian Affairs, Western Nevada Agency (BIA/WNA) received your letter concerning the Pyramid Highway-US 395 Connection Environmental Impact Statement Cooperating Agency Invitation on April 4, 2012 requesting BIA, currently serving as a participating agency, serve as a Cooperating Agency. We agree that our involvement in this project would be beneficial as it impacts Reno-Sparks Indian Colony (RSIC) lands.

The Bureau welcomes the opportunity to participate as a Cooperating Agency; and, therefore accepts your invitation. We look forward to working with you and the other agencies on this project.

Sincerely,

[Signature]
Superintendent

cc: WNA Realty Officer  
WRO Environmental Protection Officer  
Chairman Arlan Melendez, RSIC  
Steve Moran, RSIC  
Scott Nebesky, RSIC
July 9, 2012

Dr. Abdelmoez A. Abdalla  
Environmental and Research Program Manager  
U.S. Department of Transportation  
Federal Highway Administration – Nevada Division  
705 N. Plaza St. Ste. 220  
Carson City, NV 89701  

re: Pyramid Highway-US 395 Connection Environmental Impact Statement Cooperating Agency Invitation

Dear Dr. Abdalla:

The Reno-Sparks Indian Colony (RSIC) received your letter concerning the Pyramid Highway-US 395 Connection Environmental Impact Statement Cooperating Agency Invitation requesting the RSIC to serve as a cooperating agency. We agree with your assessment that the RSIC and the project would benefit from this additional level of coordination regarding the analysis and mitigation of impacts to the RSIC. We accept your request and invitation to participate in this process as a cooperating agency.

We look forward to working with you on this project.

Sincerely,

Arlan D. Melendez  
Chairman

cc: Scott Nebesky, RSIC
Mr. Arlan Melendez, Chairperson  
Reno-Sparks Indian Colony  
98 Colony Road  
Reno, Nevada  89502  

Re:  Pyramid Highway/US 395 Connection Environmental Impact Statements, Cooperating Agency Status

Dear Mr. Melendez,

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Regional Transportation Commission of Washoe County (RTC), is preparing an Environmental Impact Statement (EIS) to identify and evaluate transportation improvements along the Pyramid Highway corridor and a proposed connection between Pyramid Highway and US 395. The Draft EIS was issued in August 2013, and the Final EIS is currently being prepared.

FHWA has consulted with the Reno-Sparks Indian Colony (RSIC) since inception of the EIS process under Section 106 of the National Historic Preservation Act (NHPA). FHWA initially invited the RSIC to serve as a participating agency in this study because of potential effects to a parcel held in trust for the RSIC by the Bureau of Indian Affairs (BIA). The parcel is located south of Eagle Canyon Road and west of Pyramid Highway in the northern portion of the Study Area. The RSIC accepted the invitation to serve as a participating agency. The RSIC is also serving on the project’s Technical Advisory Committee.

Later in the EIS process, once direct effects to the parcel were confirmed, FHWA invited the RSIC to become a cooperating agency on the project to benefit consultation between FHWA and the RSIC in addressing project impacts to the RSIC parcel, and in identifying avoidance and mitigation measures. As described in our March 29, 2012 letter to you, a cooperating agency is any federal agency, other than the lead agency (in this case FHWA), that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternatives. When the effects are on tribal lands, a Native American Tribe can also be a cooperating agency by agreement with the lead federal agency.

Since the Draft EIS was issued, RTC has updated their regional traffic model and the traffic analysis conducted for the Draft EIS was re-evaluated. The reanalysis shows a reduction in forecasted traffic volumes for the EIS study area, which has allowed the project team to revisit the design of the Preferred Alternative to reduce impacts and project costs.
The modified design avoids the direct impacts to the RSIC parcel as described in the Draft EIS. Each of the build alternatives evaluated in the Draft EIS would have required right-of-way from the RSIC parcel. This was needed to accommodate the following improvements in the vicinity of the RSIC parcel:

- Pyramid Highway improved to a limited access freeway with three through lanes in both directions
- Split diamond grade-separated interchange provided at Eagle Canyon Drive/La Posada Drive
- Frontage roads provided on both sides of Pyramid Highway, 2 one-way through lanes each

Potential property acquisition from the RSIC parcel was anticipated to be approximately 3.05 acres (13.9 percent) of the 22-acre parcel. Also, all of the build alternatives included a frontage road that would provide access to the RSIC parcel, eliminating the parcel’s direct access to/from Pyramid Highway.

**Change in Project Design**
The modified project design now includes the following elements in the vicinity of the RSIC parcel (see enclosed map):

- Pyramid Highway improved to a six-lane arterial
- At-grade intersection at Eagle Canyon Road/La Posada Drive
- No frontage roads

No right-of-way would be required from the RSIC parcel. The project would result in no direct impacts to the RSIC parcel and no changes to existing access. Traffic noise and air quality impacts are currently being updated. However, based on the reduced project footprint and traffic decreases forecasted, noise and air quality impacts are anticipated to be the same or similar to those reported in the Draft EIS.

**Cooperating Agency Status**
As mentioned in our March 29, 2012 letter to the RSIC, a cooperating agency is any federal agency, other than the lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative (40 CFR 1501.6). Because of the reduced project footprint, the land over which the RSIC has jurisdiction will not be affected by the project. Therefore, the RSIC is no longer required to serve as a cooperating agency on the project and, moving forward, will continue to serve as a participating agency to the EIS. This change does not diminish the important role that the RSIC plays in this project. FHWA will continue its government-to-government relationship with the RSIC through continued consultation under Section 106 of the NHPA. Further, the RSIC remains a member of the project’s Technical Advisory Committee.

We trust the revisions to the project have addressed the RSIC’s concerns regarding effects to economic viability of the trust parcel as a result of this project. If you have any questions or concerns, please contact me at the above address, by telephone at (775) 687-1231, or by an email at abdelmoez.abdalla@dot.gov. We look forward to our continued coordination with the RSIC as this project moves forward.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager
cc: Marilyn Bitisillie, BIA

ec: Sabra Gilbert Young, NDOT
    C. Cliff Creger, NDOT
    Chris Young, NDOT
    Doug Maloy, RTC
    Jim Clarke, Jacobs
Ms. Marilyn Bitisillie  
Acting Superintendent  
Bureau of Indian Affairs  
311 East Washington Street  
Carson City, NV 89701

Re: Pyramid Highway/US 395 Connection Environmental Impact Statement, Cooperating Agency Status

Dear Ms. Bitisillie:

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Regional Transportation Commission of Washoe County (RTC), is preparing an Environmental Impact Statement (EIS) to identify and evaluate transportation improvements along the Pyramid Highway corridor and a proposed connection between Pyramid Highway and US 395. The Draft EIS was issued in August 2013, and the Final EIS is currently being prepared.

FHWA initially invited the Bureau of Indian Affairs (BIA) to serve as a participating agency in this study because of potential effects to a parcel held in trust for the Reno-Sparks Indian Colony (RSIC) by the BIA. The parcel is located south of Eagle Canyon Road and west of Pyramid Highway in the northern portion of the Study Area. The BIA accepted the invitation to serve as a participating agency.

Later in the EIS process, once direct effects to the parcel were confirmed, FHWA invited the BIA to become a cooperating agency on the project to benefit consultation between FHWA, BIA, and the RSIC in addressing project impacts to the RSIC parcel, and in identifying avoidance and mitigation measures. As described in our March 29, 2012 letter to you, a cooperating agency is any federal agency, other than the lead agency (in this case FHWA), that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternatives.

Since the Draft EIS was issued, RTC has updated their regional traffic model and the traffic analysis conducted for the Draft EIS was re-evaluated. The reanalysis shows a reduction in forecasted traffic volumes for the EIS study area, which has allowed the project team to revisit the design of the Preferred Alternative to reduce impacts and project costs.
The modified design avoids the direct impacts to the RSIC parcel as described in the Draft EIS. Each of the build alternatives evaluated in the Draft EIS would have required right-of-way from the RSIC parcel. This was needed to accommodate the following improvements in the vicinity of the RSIC parcel:

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Potential property acquisition from the RSIC parcel was anticipated to be approximately 3.05 acres (13.9 percent) of the 22-acre parcel. Also, all of the build alternatives included a frontage road that would provide access to the RSIC parcel, eliminating the parcel’s direct access to/from Pyramid Highway.

**Change in Project Design**
The modified project design now includes the following elements in the vicinity of the RSIC parcel (see enclosed map):

- Pyramid Highway improved to a six-lane arterial
- At-grade intersection at Eagle Canyon Road/La Posada Drive
- No frontage roads

No right-of-way would be required from the RSIC parcel. The project would result in no direct impacts to the RSIC parcel and no changes to existing access. Traffic noise and air quality impacts are currently being updated. However, based on the reduced project footprint and traffic decreases forecasted, noise and air quality impacts are anticipated to be the same or similar to those reported in the Draft EIS.

**Cooperating Agency Status**
As mentioned in our March 29, 2012 letter to the BIA, a cooperating agency is any federal agency, other than the lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative (40 CFR 1501.6). Because of the reduced project footprint, the land over which the BIA has jurisdiction will not be affected by the project. Therefore, the BIA is no longer required to serve as a cooperating agency on the project and, moving forward, will continue to serve as a participating agency to the EIS. This change does not diminish the important role that the BIA plays in this project. Also, FHWA will continue its government-to-government relationship with the RSIC through continued consultation under Section 106 of the National Historic Preservation Act (NHPA).

We trust the revisions to the project have addressed RSIC’s and BIA’s concerns regarding effects to economic viability of the trust parcel as a result of this project. If you have any questions or concerns, please contact me at the above address, by telephone at (775) 687-1231, or by an email at abdelmoez.abdalla@dot.gov. We look forward to our continued coordination with the BIA as this project moves forward.

Sincerely,

[Signature]

Abdelmoez A. Abdalla
Environmental Program Manager
cc: Sabra Gilbert Young, NDOT
    C. Cliff Creger, NDOT
    Chris Young, NDOT
    Doug Maloy, RTC
    Jim Clarke, Jacobs
    Greg Novak, FHWA
Appendix A:
Agency Coordination

Section 106
Appendix A:
Agency Coordination

Section 106
Consulting Party Correspondence
Nevada Division

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Mr. Ronald James  
State Historic Preservation Officer and Historian  
State Historic Preservation Office  
100 N. Stewart Street  
Carson City, Nevada  89701

Dear Mr. James:

The purpose of this letter is to invite the State Historic Preservation Office (SHPO) to become a consulting party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), to identify any concerns the SHPO may have regarding the potential effects of the proposed Pyramid Highway – US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the SHPO led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
S. Gilbert-Young, NDOT
Doug Maloy, RTC Washoe County
Level 2A Alternatives
February 5, 2009

In Reply Refer To:
HENV-NV

Nevada Division

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Mr. Donald Naquin
CLG-Contact
City of Reno, Nevada
P.O. Box 1900
Reno, Nevada 89505

Dear Mr. Naquin:

The purpose of this letter is to invite the City of Reno CLG to become a consulting party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), to identify any concerns the city may have regarding the potential effects of the proposed Pyramid Highway—US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

A. A. Abdalla

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
S. Gilbert-Young, NDOT
Doug Maloy, RTC Washoe County
Nevada Division

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Mr. Neil Krutz, P.E.
Community Development Director
City of Sparks, Nevada
1675 E. Prater Way, Ste. 107
Sparks, Nevada  89434

Dear Mr. Krutz, P.E.:

The purpose of this letter is to invite the City of Sparks to become a consulting party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), to identify any concerns the city may have regarding the potential effects of the proposed Pyramid Highway – US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency's respective roles and responsibilities during the preparation of this document, please contact Abdelmoez Abdalla, Ph. D., FHWA Environmental Program Manager at (775) 687-1231.

Sincerely Yours,

[Signature]

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
    S. Gilbert-Young, NDOT
    Doug Maloy, RTC Washoe County
Nevada Division

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Mr. Adrian P. Freund, AICP
Director
County of Washoe
P.O. Box 11130
Reno, Nevada 89520

Dear Mr. Freund, AICP:

The purpose of this letter is to invite Washoe County to become a consulting party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), to identify any concerns the county may have regarding the potential effects of the proposed Pyramid Highway – US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

[Signature]

Abdelmoez A. Abdalla, Ph. D.
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
    S. Gilbert-Young, NDOT
    [Highlighted: Doug Maloy, RTC Washoe County]
Nevada Division

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Center for Basque Studies
University of Nevada, Reno 322
Reno, Nevada 89557

To Whom It May Concern:

The purpose of this letter is to invite the Center for Basque Studies as an interested party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), identify any concerns the Center for Basque Studies may have regarding the potential effects of the proposed Pyramid Highway – US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included. Please notify FHWA of any resources that the Center for Basque Studies feels important to this EIS for the area.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

Abdelmoez A. Abdalla, Ph. D.
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
    S. Gilbert-Young, NDOT
    [Highlighted: Doug Maloy, RTC Washoe County]
February 5, 2009

In Reply Refer To: HENV-NV

Nevada Division

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Nevada Humanities-Reno Office
1034 N. Sierra Street
Reno, Nevada 89503

To Whom It May Concern:

The purpose of this letter is to invite the Nevada Humanities-Reno Office as an interested party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), identify any concerns the Nevada Humanities-Reno Office may have regarding the potential effects of the proposed Pyramid Highway–US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included. Please notify FHWA of any resources that the Nevada Humanities-Reno Office feels important to this EIS for the area.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please me at (775) 687-1231.

Sincerely Yours,

[Signature]

Abdelmoez A. Abdalla, Ph. D.
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
    S. Gilbert-Young, NDOT
    Doug Maloy, RTC Washoe County
Nevada Division

February 5, 2009

In Reply Refer To:
HENV-NV

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Nevada State Museum
600 North Carson Street
Carson City, Nevada 89701

To Whom It May Concern:

The purpose of this letter is to invite the Nevada State Museum as an interested party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), identify any concerns the Nevada State Museum may have regarding the potential effects of the proposed Pyramid Highway—US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dardini interchange. The area along Vista Boulevard to Interstate 80 also is included. Please notify FHWA of any resources that the Nevada State Museum feels important to this EIS for the area.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

Abdelmoez A. Abdalla, Ph. D,
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
S. Gilbert-Young, NDOT
Doug Maloy, RTC Washoe County
Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Historic Reno Preservation Society (HRPS)
P.O. Box 14003
Reno, Nevada 89507

To Whom It May Concern:

The purpose of this letter is to invite the HRPS as an interested party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), identify any concerns the HRPS may have regarding the potential effects of the proposed Pyramid Highway – US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included. Please notify FHWA of any resources that the HRPS feels important to this EIS for the area.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.
As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

[Signature]

Abdelmoez A. Abdalla, Ph. D.
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
    S. Gilbert-Young, NDOT
    Doug Maloy, RTC Washoe County
Level 2A Alternatives

[Map of the area with marked locations and routes.]

Downtown Reno

Area of Potential Effect

Jacobs
Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Sparks Heritage Museum
820 Victorian Ave
Sparks, Nevada 89431

To Whom It May Concern:

The purpose of this letter is to invite the Sparks Heritage Museum as an interested party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), identify any concerns the Sparks Heritage Museum may have regarding the potential effects of the proposed Pyramid Highway – US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included. Please notify FHWA of any resources that the Sparks Heritage Museum feels important to this EIS for the area.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so

Moving the American Economy
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

[Signature]

Abdelmoez A. Abdalla, Ph. D.
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
S. Gilbert-Young, NDOT
Doug Maloy, RTC Washoe County
Level 2A Alternatives
February 5, 2009

In Reply Refer To:
HENV-NV

Nevada Division

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Dr. David Rhode
Desert Research Institute
2215 Raggio Parkway
Reno, Nevada 89512

Dear Dr. Rhode:

The purpose of this letter is to invite you as an interested party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), identify any concerns you may have regarding the potential effects of the proposed Pyramid Highway – US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included. Please notify FHWA of any resources that you feel important to this EIS for the area.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

a. a. Abdalla

Abdelmoez A. Abdalla, Ph. D,
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
    S. Gilbert-Young, NDOT
    Doug Maloy, RTC Washoe County
Level 2A Alternatives
Nevada Division

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Mr. Don Hicks
Field Office Manager
Bureau of Land Management
5665 Morgan Mill Road
Carson City, Nevada 89701

Dear Mr. Hicks:

The purpose of this letter is to invite the Bureau of Land Management (BLM) to become a consulting party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), to identify any concerns the BLM may have regarding the potential effects of the proposed Pyramid Highway — US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the State Historic Preservation Office (SHPO) led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the city, the NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

MOVING THE AMERICAN ECONOMY
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency’s respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

Abdelmoez A. Abdalla, Ph. D.
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
S. Gilbert-Young, NDOT
Doug Maloy, RTC Washoe County
Ms. Rachel Crews  
Archaeologist  
Carson City Field Office  
Bureau of Land Management  
5665 Morgan Mill Road  
Carson City, Nevada 89701  

Subject: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada  
EA #: 73390 & 73391; NDOT #:WA11-009; FHWA #: DE-0191(065) & DE-019(067);  
SHPO Undertaking #: 2010-0884; SHPO Report #: 8041  

Dear Ms. Crews:

As you know, the Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is proposing a project to improve traffic flow along the Pyramid Highway from Queen Way to Calle de la Plata Drive, in Washoe County. The project also includes a connector route from US 395 to the Pyramid Highway (SR 445) through the Sun Valley neighborhood in the northwestern portion of the Reno metro area. We previously consulted with you regarding the Area of Potential Effect (APE) and eligibility and effects to historic architectural resources identified in the study area, which include the Sierra Vista Ranch Historic District, the Trosi Family/Kiley Ranch Historic District, the Iratecabal Farm Historic District, and the Prosser Valley Ditch.

The purpose of this letter is to provide information about the identification of the Preferred Alternative, design changes that occurred after the Draft EIS was issued and results of the archaeological inventory that was conducted in late 2014/early 2015. It also provides FHWA’s eligibility and effect determinations for archaeological resources identified in the inventory, and requests your concurrence on these determinations. For details about methods used and archaeological sites evaluated during the inventory, please refer to the enclosed report entitled, *A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada.* (Western Cultural Resource Management [WCRM], 2015).
The Draft Environmental Impact Statement (Draft EIS) was issued in August 2013, which evaluated a No-Action Alternative and four build alternatives to meet the purpose and need of the Pyramid Highway/US 395 Connector project.

Design Changes since the Draft EIS and Identified Preferred Alternative
Build Alternative 3 was identified in early 2014 as the Preferred Alternative after the Draft EIS comment period concluded. The design of Alternative 3 was then modified based on the updated traffic analysis that was conducted later in 2014 for the Final EIS that is currently being prepared, resulting in a reduced project footprint. This modified alternative is referred to as “Revised Alternative 3,” and is shown on Figure 1. Under Revised Alternative 3 (Preferred Alternative), Pyramid Highway would be constructed as a limited-access arterial from Calle de la Plata south to the US 395 Connector directional interchange located between Golden View and Kiley Parkway. From that point, Pyramid Highway would be constructed as an arterial south to Queen Way. No frontage roads are proposed. A new grade-separated diamond interchange would be built at Highland Ranch Parkway/Sparks Boulevard, with Pyramid Highway crossing over Sparks Boulevard. No other grade-separated interchanges are proposed along Pyramid Highway. The US 395 Connector would veer southwest on a ridge alignment, and Disc Drive would be extended west to tie into the new US 395 Connector. The US 395 Connector would include a southern crossing of Sun Valley Boulevard south of Rampion Way. Revised Alternative 3 would include construction of an interchange west of Sun Valley Boulevard and modifications to the existing US 395/Parr Boulevard interchange.

Preliminary Archaeological Survey - 2012
A preliminary “walkover” archaeological survey was conducted in 2012 of the four build alternative footprints to identify any potential archeological resources to be considered as the EIS process moved forward and in the selection of a preferred alternative. The survey consisted of a file and literature search and walkover pedestrian survey. It identified approximately 100 sites with refuse scatters/dumps, two-track road systems, prospect pits/trenches, mining complexes, and ditches. On preliminary review, the nature of these sites likely made them important for what could be learned from data recovery, if they were found to be eligible after site recordation. These sites were expected to have minimal value for preservation in place because they do not embody other values besides data and are not considered sites of transcendent importance to archaeology.

Archaeological Inventory – 2014/2015
A Class III intensive pedestrian archaeological inventory was conducted in late 2014/early 2015 of the Archaeological APE, and is documented in the enclosed report entitled, A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada. (Western Cultural Resource Management [WCRM], 2015). The Archaeological APE includes the Revised Alternative 3 (Preferred Alternative) footprint and a 100-foot-wide buffer on each side of the construction footprint to encompass direct effects from ground-disturbing activities and any applicable indirect effects. The file search conducted on the Reno-Sparks Indian Colony parcel located at Pyramid Highway and Eagle Canyon Drive revealed that no previously recorded sites have been identified on the site. Because the identified Preferred Alternative (Revised Alternative 3) would avoid direct impacts to the RSIC parcel,
further investigation of the parcel as part of the archaeological inventory was deemed unnecessary.

The inventory resulted in the documentation of 62 previously unrecorded archaeological sites and 40 isolated finds. In addition, an attempt was made to revisit 21 previously recorded sites. Of the newly recorded sites, 45 are historic, 2 are prehistoric and 15 have both historic and prehistoric components. Of the previously recorded sites, six have been destroyed by development unrelated to this project and no longer exist; one site has been destroyed with the exception of a single isolated artifact, and three are isolated artifacts that could not be relocated. The 11 remaining previously recorded sites were revisited and reevaluated for significance to the National Register of Historic Places (NRHP). Of the 21 previously recorded sites, 17 are historic, 2 are prehistoric, and 2 are multicomponent.

Of the 21 previously recorded sites in the project area, four are isolated artifacts and are categorically Not Eligible for the NRHP. Six sites no longer exist; six sites have been determined Not Eligible for the NRHP; four sites have been recommended Not Eligible for the NRHP; and one site has been determined Eligible for the NRHP under Criteria A and B (Prosser Valley Ditch, Site #26Wa6134).

Of the 62 newly recorded sites, 59 are recommended Not Eligible for the NRHP under any criteria, and three of the newly documented sites are recommended Eligible for the NRHP under Criterion D (Site #s 26Wa9822, 26Wa9841, and 26Wa9856).

A finding of Adverse Effect is recommended for Site #26Wa6134 (Prosser Valley Ditch) because it would be altered by the Preferred Alternative (Revised Alternative 3). Non data recovery treatments are recommended for this site.

The Study team evaluated the Preferred Alternative (Revised Alternative 3) alignment to determine if impacts to the three sites eligible for the NRHP under Criterion D (Sites 26Wa9822, 26Wa9841, and 26Wa9856) could be avoided or minimized. It was found that moving the Preferred Alternative alignment to avoid or minimize impacts to two of the sites (Sites 26Wa9822 and 26Wa9841) is not feasible or practical. Due to the topographic conditions, any alignment shift would greatly increase earthwork and costs. Therefore, the Preferred Alternative will result in an Adverse Effect to those two sites (Site #s 26Wa9822 and 26Wa9841), and a treatment plan will be developed as stipulated in the Programmatic Agreement. For the third site eligible for the NRHP under Criterion D (Site #26Wa9856), the design team confirmed that impacts to the site can be avoided by minor design modifications, such as slightly steepening the slope. Therefore, FHWA recommends that the Preferred Alternative will result in No Historic Properties Affected for Site #26Wa9856.

Previously recorded sites and newly recorded sites that are not recommended Eligible for the NRHP and their effect recommendations are summarized in Table A, and those that are recommended Eligible for the NRHP and their effect recommendations are summarized in Table B.
<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Determination/Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Previously Recorded Sites</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>26Wa3259</td>
<td>Historic</td>
<td>Building Vestige</td>
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<td>Historic</td>
<td>Historic Trash Scatter</td>
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<tr>
<td>26Wa5398</td>
<td>Historic</td>
<td>Prospects and Modern Trash Midden</td>
<td>NA, site no longer exists</td>
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<tr>
<td>26Wa5400</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>NA; isolates are categorically not eligible to the NRHP</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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</tr>
<tr>
<td>26Wa5403</td>
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<td>NA</td>
<td>NA</td>
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<tr>
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<td>Prospect Complex</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<tr>
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<td>Refuse Dump</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9977</td>
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<td>Transportation - Road</td>
<td>Determined Non-Significant/Not Eligible</td>
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<td>No Further Work</td>
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<tr>
<td>26Wa7122</td>
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<td>Farming or Ranching Activity Site</td>
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<td>NA</td>
<td>NA</td>
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<td>26Wa7123</td>
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<tr>
<td>26Wa8627</td>
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<td>No Historic Properties Affected</td>
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<td>Prospect Complex</td>
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<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<td>Historic</td>
<td>Refuse Dump</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9845</td>
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<td>Simple Lithic Assemblage; Debris Scattered</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
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<tr>
<td>26Wa9846</td>
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<td>Simple Lithic Assemblage; Historic Isolated Artifact</td>
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<td>No Further Work</td>
<td></td>
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<tr>
<td></td>
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<td>Newly Recorded Sites</td>
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<td>26Wa9818</td>
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<td>Simple Lithic Assemblage</td>
<td>Non-Significant/Not Eligible</td>
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<td>No Further Work</td>
<td></td>
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<tr>
<td>State #</td>
<td>BLM#</td>
<td>Site Temporal Affiliation/Component</td>
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<tr>
<td>26Wa9776</td>
<td>CrNV-03-9619</td>
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<td>Non-Significant/Not Eligible</td>
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<td>No Further Work</td>
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<tr>
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<tr>
<td>26Wa9779</td>
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<tr>
<td>26Wa9783</td>
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<tr>
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</tr>
<tr>
<td>26Wa9785</td>
<td>CrNV-03-9628</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Mining Complex;</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9786</td>
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<td>Prospect Complex</td>
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<tr>
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</tr>
<tr>
<td>26Wa9791</td>
<td>CrNV-03-9634</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
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<td>No Historic Properties Affected</td>
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</tr>
<tr>
<td>26Wa9793</td>
<td>CrNV-03-9636</td>
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<td>Prospect Complex</td>
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<tr>
<td>26Wa9794</td>
<td>CrNV-03-9637</td>
<td>Prehistoric; Unknown/ Multicomponent</td>
<td>Prehistoric isolated artifact; Prospect complex and stacked rock feature of unknown age</td>
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<tr>
<td>26Wa9795</td>
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<tr>
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<tr>
<td>26Wa9797</td>
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<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>State #</td>
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<td>No Further Work</td>
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<td>26Wa9814</td>
<td>CrNV-03-9657</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9818</td>
<td>CrNV-03-9661</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9825</td>
<td>Historic</td>
<td>Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9826</td>
<td>Historic</td>
<td>Mining Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9827</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9828</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9829</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9830</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9831</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9832</td>
<td>Historic</td>
<td>Transportation – Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9833</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
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<tr>
<td>26Wa9834</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9836</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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</tr>
<tr>
<td>26Wa9837</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
</tbody>
</table>
### Table A. Sites Not Eligible for the NRHP

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Determination/Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa9839</td>
<td>N/A</td>
<td>Historic</td>
<td>Mining Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9842</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospecting Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9847</td>
<td>N/A</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9848</td>
<td>N/A</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9849</td>
<td>N/A</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9850</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9851</td>
<td>N/A</td>
<td>Historic</td>
<td>Debris Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9852</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9853</td>
<td>N/A</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9854</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>26Wa9855</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>26Wa9856</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>26Wa9857</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>26Wa9858</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>26Wa9859</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>26Wa9860</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>26Wa9861</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>26Wa9862</td>
<td>N/A</td>
<td>Historic</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
</tr>
</tbody>
</table>

Source: WCRM, 2015

### Table B. Recommended/Determined Eligible Sites

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Rec.</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Previously Recorded</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26Wa6134</td>
<td>CrNV-31-4843</td>
<td>Historic</td>
<td>Irrigation Ditch</td>
<td>Determined Eligible under Criteria A and B.</td>
<td>Adverse Effect; Segment C will be directly impacted by the project</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td><strong>Newly Recorded Sites</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26Wa9822</td>
<td>CrNV-03-9685</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic - Not Eligible</td>
<td>Adverse Effect; Site is located within the project disturbance footprint</td>
<td>Mitigate Adverse Effects</td>
</tr>
</tbody>
</table>
Table B. Recommended/Determined Eligible Sites

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Rec.</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa9841</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic – Not Eligible</td>
<td>Adverse Effect; Site is located within the project disturbance footprint</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td>26Wa9856</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic – Not Eligible</td>
<td>No Historic Properties Affected because site can be avoided through minor design modifications</td>
<td>No further work</td>
</tr>
</tbody>
</table>

Source: WCRM, 2015

Summary

**Historic Architectural Resources:** Through previous Section 106 consultation, it was determined, and you have concurred, that there are four NRHP eligible historic architectural resources within the project’s APE. Those resources and effect determinations are listed below:

- Sierra Vista Ranch Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Trosi Family/Kiley Ranch Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Iraucabal Farm Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Prosser Valley Ditch Segment C: Eligible under Criteria A and B. Recommended effect: Adverse Effect

**Archaeological Resources:** FHWA is recommending the following eligibility and effect determinations for archaeological resources identified within the Preferred Alternative footprint:

- Site #26Wa9822: Eligible under Criterion D. Recommended effect: Adverse Effect
- Site #26Wa9841: Eligible under Criterion D. Recommended effect: Adverse Effect
- Site #26Wa9856: Eligible under Criterion D. Recommended effect: No Historic Properties Affected

**Section 4(f) Exception (23 CFR 774.13[b])**

Based on the foregoing information and findings in the enclosed report, FHWA has concluded that Site #26Wa9822, Site #26Wa9841, and Site #26Wa9856 are important chiefly because of what can be learned by data recovery and have minimal value for preservation in place; therefore, section 4 (f) evaluation is not required.

Based on the above information and enclosed report, we request your concurrence on the eligibility determinations as stated in Tables A and B, and the effect determination of adverse for the project level effect and the individual determination of effect for sites 26Wa9822, 26Wa9841, and 26Wa9856 as stated above.
If you have any questions please contact Cliff Creger of NDOT at 775-888-7666 or myself at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures:
Figure 1: Revised Alternative 3 (Preferred Alternative)
_A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada._ (Western Cultural Resource Management [WCRM], 2015)

cc: V. Hawley, Pyramid Lake Indian Tribe
A. Melendez, Reno-Sparks Indian Colony
N. Mortimer, Washoe Tribe of Nevada and California

cc: C. Cliff Creger, NDOT
C. Young, NDOT
E. Dickey, NDOT
Doug Maloy, RTC
Jim Clarke, Jacobs
Figure 1. Revised Alternative 3 (Preferred Alternative)
Cliff,

I have reviewed FHWA's eligibility and effect determinations for the Pyramid Highway/US 395 Connector Project. The BLM agrees with FHWA's determinations of eligibility and effect for all cultural resources documented on public lands managed by the BLM. The BLM has no comment on eligibility and effect determinations for cultural resources located on private lands.

This email response is provided on behalf of our Acting Field Manager, Victoria Wilkins, who is cc'd here. If you require a response by formal letter, please let me know.

Sincerely,

Rachel Crews, Archaeologist
Bureau of Land Management
Sierra Front Field Office
5665 Morgan Mill Road
Carson City, NV  89701

(775) 885-6152  Phone
(775) 885-6147  Fax

rcrews@blm.gov
Good morning Cliff,

Please forgive the tardy response, I thought I had responded earlier but I see that I did not. As currently proposed we have no concerns with the proposed undertaking as it pertains to the California National Historic Trial. We appreciate the opportunity to consult.

Sincerely,
Jill Jensen

--
Jill Jensen
Archaeologist
National Trails Intermountain Region
National Park Service
324 S. State Street, Suite 200
Salt Lake City, UT  84111
Phone: 801-741-1012 xt 115
Fax: 801-741-1102

http://www.nps.gov/ntir/

Working with you to protect, develop, and promote national historic trails.

On Thu, Jun 29, 2017 at 4:09 PM, Creger, Cliff <CCreger@dot.nv.gov> wrote:

Jill:

What do you think about trails in the area of this project?

Cliff
Good Afternoon Jill,

On behalf of the Nevada Department of Transportation (NDOT) and the Federal Highways Administration (FHWA), I am contacting you regarding a NDOT/FHWA project taking place in the Reno-Sparks area, Washoe County, Nevada. This project will connect the Pyramid Highway with US 395. The description of the project and the APE are attached.

Funding for the project is federal-aid administered by the FHWA and is subject to cultural resource considerations. As part of the National Trails System Memorandum of Understanding, we would like to provide you with the opportunity to comment on the undertaking that may be in the proximity of the California National Trail. Please find a map of the project area boundary attached to this email.

Sincerely,

Cliff

New Email Address: ccreger@dot.nv.gov

C. Cliff Creger, MA, RPA
Chief Cultural Resources Program Manager
Nevada Department of Transportation
1263 S. Stewart St.
Carson City, Nevada 89712
775-888-7666

There is no “I” in Team and there is no “I” in Nevada!
Pyramid Highway/US 395 Connector Project
Reno, Washoe County, Nevada

Description of Undertaking
The Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is preparing an Environmental Impact Statement (EIS) to evaluate effects from proposed transportation improvements along Pyramid Highway from Queen Way to Calle de la Plata Drive, in Washoe County to improve the area’s traffic flow. The project also proposes to construct a new connection between US 395 and Pyramid Highway (SR 445) through the Sun Valley area in the northwestern portion of the Reno metro area. RTC, FHWA, and NDOT are evaluating four build alternatives, referred to as Arterial Alternatives, to address the purpose and need of the project.

Each of the Arterial Alternatives would have similar improvements along the 7.7-mile segment of Pyramid Highway in the Study Area, from Queen Way north to Calle de la Plata through the communities of Sparks and Spanish Springs. Each Arterial Alternative would include a new arterial facility (US 395 Connector) and ancillary improvements from Pyramid Highway to US 395, through the Sun Valley area. Arterial improvements are designed to carry traffic directly to US 395 via the US 395 Connector rather than along the existing Pyramid Highway to McCarran Boulevard or I-80. Both the US 395 Connector and Pyramid Highway segments north to Calle de la Plata Drive would be constructed as high speed, access-controlled primary arterial highways with a combination of interchanges and at-grade intersections at certain intersecting roadways.

Arterial design elements along Pyramid Highway include installing a raised median to separate directions of travel and limit left-turn access. Along the new US 395 Connector, the design includes an unpaved median and barrier rail only at select locations where required to meet clear zone distances. Approaching US 395, all the Arterial Alternatives would be constructed as limited-access facilities with increased use of barrier rail on both the outside shoulders and in the median, mostly due to topographic constraints.

The US 395 interchange at Parr Boulevard would be reconstructed and reconfigured to accommodate the new directional system interchange for the US 395 Connector. Raggio Parkway, Dandini Boulevard, and Spectrum Drive would be realigned in this area to accommodate the interchange improvements and provide improved access to the Desert Research Institute (DRI) and Truckee Meadows Community College (TMCC) campuses.

Areas where the Arterial Alternatives differ are summarized below:

- Arterial Alternative 1 would consist of an alignment just west of the existing Pyramid Highway between the US 395 Connector and Highland Ranch Parkway. This alignment would be located just below the mountain ridgeline west of Pyramid Highway. Of the two alignments through Sun Valley, Arterial Alternative 1 would follow the northern crossing and would include an interchange at Sun Valley Boulevard.
- Arterial Alternative 2 would consist of an alignment along the existing Pyramid Highway between the US 395 Connector and Sparks Boulevard/Highland Ranch Parkway. The US 395 alignment would follow the southern crossing of Sun Valley and would include an interchange at Sun Valley Boulevard.
- Arterial Alternative 3 would consist of an alignment along the mountain ridgeline between the US 395 Connector and Sparks Boulevard/Highland Ranch Parkway. This alignment would not include any interchanges between Disc Drive and Highland Ranch Parkway. The US 395 alignment would follow the southern crossing of Sun Valley and would include an interchange immediately west of Sun Valley Boulevard.
- Arterial Alternative 4 would consist of the Arterial Alternative 2 alignment with a northern crossing of Sun Valley and an interchange immediately west of Sun Valley Boulevard.
Historic Architecture and Archaeological Area of Potential Effect (APE)

The historic architecture direct APE includes the footprint for all arterial alternatives. The historic architecture indirect APE includes adjacent parcels and parcels that might be visually, audibly, or cumulatively impacted by the project. This parcel-based APE extends from the direct impact footprint in areas where above-grade improvements such as grade-separated interchanges are proposed that could potentially result in visual impacts. The indirect APE encompasses indirect effects, including potential visual, audible, atmospheric, and cumulative effects of the undertaking.

The direct archaeological APE consists of the footprint of the identified Preferred Alternative plus a 100-foot buffer on both sides of the footprint to account for minor design changes that may occur during final design and temporary construction easements. The Preferred Alternative will be identified once the Final EIS updates are completed, which is anticipated to occur end of May or June 2017.
August 8, 2017

MS. REBECCA PALMER  
STATE HISTORIC PRESERVATION OFFICER  
NEVADA STATE HISTORIC PRESERVATION OFFICE  
901 S STEWART STREET SUITE 5004  
CARSON CITY NEVADA 89701-4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada  
Request for Concurrence on Area of Potential Effects  
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);  
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

The purpose of this letter is to respond to your questions and requests for clarification in your May 18, 2017 letter regarding the Direct and Indirect Areas of Potential Effect (APEs), and request your concurrence with the APEs as described in this letter for the above-referenced undertaking.

In our previous consultation with your office, we differentiated between archaeological and historic architecture Direct APEs. Your May 18, 2017 letter refers to Direct and Indirect APEs without differentiating between archaeological and historic architecture. To be clear and consistent when describing the APEs for this undertaking, this letter refers only to Direct and Indirect APEs from this point forward. Previous consultation letters regarding the APEs for this undertaking are provided in Attachment A for your reference; however, the APE descriptions provided in this letter and attachments supersede that provided in previous consultation. The reports referenced in this letter were provided to your office previously. Please refer to Attachment A of our April 19, 2017 letter to your office for a description of this undertaking.

This letter is organized as follows:

1. Responses to State Historic Preservation Officer’s (SHPO’s) May 18, 2017 questions
2. Indirect APE changes and clarification  
   a. Parcels added to the Indirect APE  
   b. Clarify areas where the Direct and Indirect APEs are one in the same
3. Level of identification  
   a. Historic architecture resources  
   b. Archaeological resources
4. Request for concurrence on APEs
August 8, 2017

MS. REBECCA PALMER
STATE HISTORIC PRESERVATION OFFICER
NEVADA STATE HISTORIC PRESERVATION OFFICE
901 S STEWART STREET SUITE 5004
CARSON CITY NEVADA 89701-4285

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1. Responses to State Historic Preservation Officer's (SHPO's) May 18, 2017 questions
2. Indirect APE changes and clarification
   a. Parcels added to the Indirect APE
   b. Clarify areas where the Direct and Indirect APEs are one in the same
3. Level of identification
   a. Historic architecture resources
   b. Archaeological resources
4. Request for concurrence on APEs
1. Responses to SHPO’s May 18, 2017 questions:

Following are responses to your questions, which have been lettered for ease of reference.

a. **Question:** It is not clear if, or where, staging areas will be located in the Direct APE.

   **Response:** The Direct APE was developed to accommodate likely construction staging areas. The Direct APE is shown on a USGS topographic map on attached Figure 1. For your reference, the attached Figure 2 provides the USGS topographic map with the APEs removed.

b. **Question:** It is not clear if the Direct APE includes the 100-meter buffer mentioned in the March 28, 2017 meeting minutes.

   **Response:** The Direct APE is the same for historic architecture and archaeological resources. The Direct APE includes the construction footprints of all arterial alternatives and construction staging areas (see attached Figure 1). A 100-foot (not meter) buffer was added to the survey conducted for the Preferred Alternative only and it is inside the indirect APE. Refer to the *Level of Identification* section below for more details.

c. **Question:** It is not clear what the total acreage of the established Direct APE is at this time.

   **Response:** The Direct APE consists of approximately 2,765 acres.

d. **Question:** It is not clear why the Indirect APE has several "cutouts," some of which are alongside or near areas where work will occur. The APE also has several areas in which it appears very narrow, versus other areas where it extends a considerable distance. In order to better understand why the APE is shaped in this manner, more information is needed about the location and type of each of the proposed new vertical elements. The SHPO suggests submitting a new set of maps, similar to those depicting the various arterial alternatives (Figures 1-5), that show exactly where light poles, retaining walls, elevated roadway segments, and other new vertical elements will be located. The maps could be color-coded to differentiate between elements of different heights. Ideally, those elements can be depicted on maps that also show the Indirect APE so that our office can better understand the rationale behind the APE’s shape. As the SHPO previously discussed with NDOT, the Indirect APE should be based on topography and viewshed and not on parcel boundaries. We request a meeting with your architectural historian to discuss the above.

   **Response:** The Indirect APE is shown on attached Figure 1 and Figure 3. The “cutouts” that appear within the APE are due to one of the following reasons:

   - **Cutouts alongside or near areas where work will occur:** These cutouts represent existing roadway right-of-way (ROW) located adjacent to existing roadway (see example below). Because proposed work will occur within existing ROW, the Indirect APE in these locations is identical to the Direct APE.

   **Note:** in the examples provided below, the Indirect APE is represented by the orange-shaded areas, and the Direct APE is represented by red areas (which represent permanent impact areas) and yellow areas (which represent temporary impact areas).
• **Cutouts within the APE:**
  - Parcels adjacent to existing road and adjacent to proposed new alignment were included in the Indirect APE, but due to the distance between the existing road and new roadway alignment, some parcels located in between were not included in the APE, resulting in cutouts. See example below.

  ![Cutouts within the APE](image)

  - Some cutouts within the Indirect APE are a result of large and/or irregularly shaped parcels adjacent to the Direct APE. An example of this is not provided in this letter, but can be seen on attached Figure 1 and 3 south side of Disc Drive.

• Regarding areas of the Indirect APE that appear very narrow versus other areas that extend a considerable distance:
The Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (January 2012; revised December 2012) describes the methodology used to establish the historic architecture Direct and Indirect APEs, with which your office previously concurred. Excerpts from the above-referenced report describing the APE methodology are provided below, which explain why there are narrower and wider areas of the Indirect APE:

Page 10: "In consultation with the State Historic Preservation Office (SHPO), the FHWA determined that an appropriate Area of Potential Effect (APE) for historic structures would include parcels immediately adjacent to the Pyramid Highway, near Nevada State Highway 443, parcels bordering vacant lots that are immediately adjacent to these routes, and parcels that will be visually impacted by the proposed improvements. The APE is approximately 12.7 miles long, beginning at Calle de la Plata and ending at Queen Way as well as in the vicinity of State Highway 443."

Page 30: "A project-specific APE for the built environment has been proposed, in accordance with 36 CFR Part 800.16 (d), which defines an APE as: 'The geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.'

"NDOTs' architectural historian, Elizabeth Dickey, drew the proposed project APE to ensure identification of all significant (listed in or eligible for inclusion in the NRHP) historic and architectural resources that have the potential to be directly or indirectly affected by the proposed project. For a parcel to be identified as part of the APE, a demonstrable effect, including but not limited to: a taking, visual, audible or atmospheric effects that would result from the project must be anticipated. Where alterations to the existing road would not require a taking of land, nor appreciably change views to or from the parcel, its setting would not be altered, and noise levels would not substantially change; the parcel was not included within the proposed APE boundaries [emphasis added].

"The APE, as put forth by NDOT, includes the proposed project right-of-way and/or areas of direct ground disturbance as they are presently anticipated which include areas for staging and temporary building activities. The proposed APE encompasses entire parcels (bounded by the parcel lot lines), from which any partial or full acquisition or other effects (including visual or audible effects) are expected to result from the proposed project [emphasis added]."
"In keeping with NDOT policies and practices, the project-specific viewshed is proposed as a component of the APE. The identified viewshed expands the fundamental APE, as it includes properties that may have vista-related, rather than direct impacts. The viewshed, which is part of the proposed APE, includes all properties whose views to and from the proposed project may be substantially different from existing or baseline conditions. If the current viewshed includes an existing large freeway, a related interchange or overcrossing, or an improved multi-lane highway and the proposed viewshed would contain essentially the same views, the property would not be included in APE boundaries. For a property to be included in the viewshed and thus the APE, a demonstrable effect could be expected to be caused by the changed views that would result from construction and implementation of the proposed project." [emphasis added]

- In some areas, the Indirect APE is very narrow in some areas and extends larger distances in other areas due to irregularly-shaped and/or large parcels along the corridor; parcel boundaries within the Indirect APE can be seen on attached Figures 1 and 3.

- In a few areas where only at-grade work will occur, the Direct and Indirect APE are one in the same. For simplicity, these areas are shown as part of the Direct APE on attached Figure 1. See example of such an area below (in example below, the Direct APE is shown by the red areas (which indicate permanent impacts) and yellow areas (which indicate temporary impacts), and Indirect APE is shown as the orange area) (also refer to the Clarify areas where Direct and Indirect APEs are one in the same section later in this letter):
Regarding your request for more mapping and information about the location and type of proposed new vertical elements for the various arterial alternatives, the attached Figure 3 shows the Indirect APE and all arterial alternative footprints that have been color coded to indicate the different elevated and at-grade project elements, summarized below.

- **At-grade improvements on existing facility (indicated by blue shading on attached Figure 3).** These improvements include elements such as road widening, striping, and bicycle/pedestrian facilities on existing facilities. These improvements occur along existing Pyramid Highway, Disc Drive, Sun Valley Boulevard, and US 395. Because these improvements would occur at-grade where facilities already exist, indirect effects, including visual and noise, would be limited to adjacent parcels.

- **At- or below-grade improvements on new alignment (indicated by green shading on attached Figure 3).** These improvements include construction of new road and bicycle/pedestrian facilities on new alignments. These improvements occur along the proposed new US 395 Connector. The location of at- or below-grade elements along the US 395 Connector alignment varies depending on the arterial alternative and the topography along each alignment. These improvements also occur in Sun Valley where Dandini Boulevard and Raggio Parkway would be realigned to accommodate the new US 395 Connector, and where Raggio Parkway would be extended north to 2nd Avenue. These types of improvements potentially would have greater visual impacts than improvements to existing facilities, depending on the viewed.

- **Elevated section/improvements (indicated by purple shading on attached Figure 3).** These improvements include bridges, overpasses, and ramps associated with grade-separated interchanges and new road alignments on hilly terrain. These improvements occur in areas along Pyramid Highway between Sparks Boulevard and Disc Drive, in areas along the new US 395 Connector (depending on terrain and the arterial alternative alignment), areas within Sun Valley, and the US 395/Parr Boulevard/US 395 Connector interchange. These types of improvements potentially would have greater visual impacts than those described above, depending on the existing setting and viewed.

- **Tie-in sections (indicated by bright pink shading on attached Figure 3).** These improvements include minor at-grade improvements to intersecting roadways in order for those roads to tie-in to the proposed road improvements. These improvements occur at certain intersecting roads along Pyramid Highway and Disc Drive. Because these improvements would occur at-grade where road facilities already exist, indirect effects, including visual, would be limited to adjacent parcels.

Vertical elements such as light poles, traffic signals, and signage were also considered in developing the Indirect APE. However, at the current level of preliminary design, the exact locations of light poles have not been determined; this will be determined during final design. As such, the exact locations of light poles are not provided. Overall, however, street lights would be installed at intersections along the improved roadway corridors and other areas for safety according to NDOT standards. Traffic signals are proposed at intersecting streets along Pyramid Highway that are currently stop sign controlled, including Calle de la Plata, Egyptian Drive/Sunset Springs Lane, and Dolores Drive.
The Indirect APE encompasses areas that may experience demonstrable indirect effects from the undertaking. In many areas, views of proposed improvements are blocked by existing development and topography, are visually indistinguishable due to distance, or are consistent with existing views. The following factors were considered in determining the Indirect APE:

- **Type of improvement**: Resurfacing, road widening, bridge/overpass/ramp, lighting, bicycle/pedestrian facilities, or tie-in improvements.
- **Context of improvement**: Improvements on existing transportation alignment (within existing built environment or within undeveloped environment), or on new alignment (within existing built environment or within undeveloped environment).
- **Viewshed**: at-grade, below grade, or above grade improvements; topography; line-of-sight; vantage points.
- **Viewshed from improvement**: Approximate distance in feet.
- **Historic Property Type (if known)**: setting, property sensitivity to visual and auditory effects, historic associations.
- **Whether adjacent parcel captures viewshed**.

Table 1 (attached) presents the rationale used to establish the Indirect APE boundary based on the factors listed above, and broken out by segments listed below and shown on attached Figure 3. Table 2 (attached) provides viewshed photos for each segment.

- **Segment A**: Along Pyramid Highway – starting north of Calle de la Plata and ending south of Lazy 5 Parkway.
- **Segment B**: Along Pyramid Highway starting south of Lazy 5 Parkway and ending at south of Kiley Parkway.
- **Segment C**: Along Pyramid Highway starting south of Kiley Parkway and ending north of Los Altos Parkway.
- **Segment D**: Along Pyramid Highway starting north of Los Altos Parkway and ending at Disc Drive.
- **Segment E**: Along Pyramid Highway starting at Disc Drive and ending at Queen Way, and along Disc Drive from Pyramid Highway east to Vista Boulevard.
- **Segment F**: Along the new US 395 Connector alignments for the various arterial alternatives starting south of Sparks Boulevard and ending east of Sun Valley.
- **Segment G**: The US 395 Connector alignment alternatives crossing through Sun Valley over Sun Valley Boulevard, starting east of Sun Valley Boulevard and ending west of Sun Valley Boulevard.
- **Segment H**: Sun Valley Boulevard/Clear Acre Lane starting south of 1st Avenue and ending north of Crystal Lane.
- **Segment I**: Along new US 395 Connector starting west of Sun Valley Boulevard and ending at US 395.
- **Segment J**: An approximate 1.5 mile stretch of US 395 at the existing US 395/Parr Boulevard interchange.
2. Indirect APE changes and clarification

a. Parcels added to the Indirect APE:

In reviewing the Indirect APE to respond to your questions, we identified a few parcels that needed to be added to the Indirect APE, and locations where it needs to be clarified that the Direct and Indirect APE are one in the same. These changes were made to the Indirect APE boundary and are reflected in the Indirect APE illustrated on the attached figures. The parcels added to the Indirect APE are listed below (listed north to south, and east to west) and identified on attached Figures 1 and 3. The identification of National Register of Historic Places (NRHP)-eligible resources within the added parcels will be addressed in our forthcoming determination of eligibility and effects letter, which will be prepared once your concurrence on the APEs is received.

- Remainder of parcel located east of Pyramid Highway south of La Posada Drive.
- Parcel located west of Pyramid Highway near Kiley Parkway intersection.
- Four adjacent parcels located within residential development in southeast quadrant of Pyramid Highway/Kiley Parkway intersection.
- Parcels located at residential cul-de-sac on Dorchester Drive.
- Two adjacent parcels located within northeast quadrant of the Pyramid Highway/Los Altos Parkway intersection.
- Adjacent parcels located west of Pyramid Highway near Los Altos Parkway intersection.
- In Sun Valley, parcel located south of new US 395 Connector (for Alts 2 and 3 only), east side of Sun Valley Boulevard and north of El Rancho Drive.

b. Clarify areas where Direct and Indirect APEs are one in the same

In reviewing the Indirect APE to respond to your questions, we identified locations where it needs to be clarified that the Direct and Indirect APE are one in the same. These areas are located within the project footprint at the locations listed below:

- On Pyramid Highway north of Calle de la Plata.
- On Calle de la Plata where tie-in improvements would be made east and west of Pyramid Highway.
- On Egyptian Drive where tie-in improvements would be made on west side of Pyramid Highway.
- On Dolores Drive west of Pyramid Highway where tie-in improvements would be made.
- On Highland Parkway west of Pyramid Highway where tie-in improvements would be made.
- On Los Altos Parkway east of Pyramid Highway where tie-in improvements would be made.
- On Sparks Boulevard south of Disc Drive where tie-in improvements would be made.
- On Vista Boulevard south of Disc Drive where tie-in improvements would be made.
• In Sun Valley (Alts 1 and 4 only) on Leon Drive (north and south of US 395 Connector) and Franks Lane – includes improvements to existing roads and paving dirt portion of Leon Drive. At proposed cul-de-sacs at Saguaro Drive and Rampion Way on north side of US 395 Connector, and at Sugar Hill Drive south of US 395 Connector.
• In Sun Valley, on 2nd Avenue – at-grade improvements to accommodate connection to extended Raggio Parkway.
• On Sun Valley Boulevard at southern terminus of arterial alternative footprints.

Based on the information provided above, the Indirect APE adequately encompasses the indirect effects potentially caused by this undertaking.

3. Level of identification

a. Historic Architecture Resources: To identify NRHP-eligible historic architectural resources, the Direct and Indirect APEs were surveyed, including file and literature searches and field surveys where access was authorized. Please refer to the Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (January 2012; revised December 2012) for details about specific methodology used for surveys.

b. Archaeological Resources: To identify archaeological resources, first a file and literature search and walkover survey was conducted, beginning in 2010. The file and literature search was conducted for an area that included all four project alternative footprints and lands at least a mile around them. A field walkover survey was conducted to locate and preliminarily identify sites and isolates within the project footprints (also known as the Direct APE). The survey involved on-site inventories of parcels contained within project alternative footprints (Direct APE) where access was allowed. Please refer to the File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (March 5, 2012; Revised May 17, 2012) for more details.

Once the Preferred Alternative was identified (Alternative 3), a Class III cultural resources inventory was conducted in late 2014/early 2015 for the Preferred Alternative construction footprint plus a 100-foot (not meter) wide buffer on either size of the footprint to encompass direct effects from ground-disturbing activities and any applicable indirect effects (the Preferred Alternative construction footprint falls within the Direct APE because the Direct APE includes the construction footprint and staging areas for all arterial alternatives).

4. Request for concurrence on APEs

The Section 106 consultation has been ongoing since 2008, based on the foregoing, NDOT and FHWA request your concurrence on the Direct and Indirect APEs and identification established for this undertaking.

FHWA and NDOT are requesting a 15-day turn around on this letter due to how close we are on getting to agreement.

Once your concurrence is obtained, FHWA and NDOT will consult with your office on determinations of NRHP eligibility and effects.
This information has been forwarded concurrently to the following consulting parties for review: Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California. We will notify you of any responses received from these groups.

If you have any questions please me at 775-888-7666.

Sincerely,

C. Cliff Creger
Chief Cultural Resources Program Manager

Enclosures:
Attachment A: Previous APE Consultation Correspondence:
- May 18, 2011 FHWA letter to SHPO
- September 8, 2011 FHWA letter to SHPO
- October 11, 2011 SHPO letter to FHWA
- August 31, 2012 SHPO letter to FHWA
- October 14, 2015 SHPO letter to FHWA
- April 19, 2017 FHWA letter to FHPO
- May 18, 2017 SHPO letter to FHWA

Figure 1: Direct and Indirect APEs on USGS topo
Figure 2: USGS topo with APE shapes removed
Figure 3: Indirect APE and Arterial Alternative Elements on aerial

Table 1: Factors Used to Determine Indirect APE Boundary
Table 2: Viewshed Photos, by Segment

cc: Abdelmoez Abdalla, FHWA
    Jacob Waclaw, FHWA
    Dale Wegner, FHWA
    Greg Novak, FHWA
    Pyramid Lake Paiute Tribe
    Reno-Sparks Indian Colony
    Washoe Tribe of Nevada and California
    Doug Maloy, RTC
    Jim Clarke, Jacobs
    Bryan Hockett, BLM
Ms. Rebecca Palmer  
Nevada State Historic Preservation Office  
100 N. Stewart Street  
Carson City, Nevada 89701

Subject: Request for Concurrence on Pyramid Highway/US 395 Connection Project, Washoe County, Nevada EA: 73391

Dear Ms. Palmer:

The Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is preparing an Environmental Impact statement (EIS) for the proposed improvements to Pyramid Way (SR 445) and to construct a new corridor from Vista Boulevard to US 395 in Washoe County, Nevada. FHWA requests that you review the information provided, and concur with FHWA’s determinations for the Areas of Potential Effect for archaeological and historic architectural resources for the proposed project.

Project Purpose and Description

The purpose of the project is to relieve traffic congestion on the Pyramid Highway and provide improved east/west community connectivity from Pyramid way to US 395 and east to Vista Boulevard.

The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way to Calle de la Plata Drive. It also includes an area extending approximately 5 miles, from east of Vista Boulevard to US 395 near the Parr/Dandini interchange. The area along Vista Boulevard to US 395 is also included (see enclosed maps).

The project involves widening of the Pyramid Highway from Queen Way to Calle de la Plata Drive and construction of an interconnector highway from Pyramid Highway to US 395.

The major components of the project, including its alternatives might include:

- Construction of bridges (25’ to 28’ high) on Pyramid Highway over the following cross streets and locations:
  1. Eagle Canyon Road
  2. Delores Drive
  3. Lazy 5 Parkway
  4. Sparks Boulevard
  5. Golden View
6. Just north of Los Altos Parkway
7. Northwest of the Pyramid Highway/Disc Drive Intersection (Bridge 17B)
8. West of the Pyramid Highway/Disc Drive Intersection (Bridge 18)
9. North of the Pyramid Highway/Disc Drive Intersection (Bridge 19)

- New alignment to the Pyramid Highway that would connect Pyramid Highway with US 395, north of McCarran Boulevard and through Sun Valley.

- Construction of new local roads at the following locations:
  1. Extending Delores Drive and Tierra Del Sol Parkway to an unnamed road to the east.
  2. Connecting Blue Skies Drive with Blue Gem Circle with outlets to Evening Starr Drive and the Oasis Mobile Estate Mobile Home Park.

- Widening and improvements of roads at the following locations:
  1. Disc Drive from Pyramid Highway to the Vista Boulevard
  2. Pyramid Highway between Disc Drive and Queen Way

- Construction and substantial reconfiguration of interchanges at the following locations:
  1. US 395/Pyramid Highway interchange in the vicinity of the Parr Boulevard overpass, including five bridge structures up to 28' high
  2. Pyramid Highway, First Street and El Rancho Drive, including eight bridge structures up to 28' high

More information on the Pyramid Highway/US 395 Connection Project can be found on the project website: <http://www.pyramidus395connection.com/index.html>

Archaeology Area of Potential Effect
The archaeological Area of Potential Effect (APE), which includes the project alternatives footprint, is shown in the enclosed Archaeological APE Maps.

Historic Architectural Resource Area of Potential Effect
The historic architectural APE includes the project footprint (including the alternatives), adjacent parcels, and parcels that might be visually impacted by the project. There are 655 parcels in the APE and 617 acres (see enclosed Historic Architecture APE Maps).

If you have any questions, please feel free to call me at 775-687-1231.

Sincerely,

[Signature]

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
    Doug Maloy, RTC Washoe

ec: Andrew Soderborg, FHWA
Ms. Rebecca Palmer  
Deputy Historic Preservation Officer  
State Historic Preservation Office  
100 N. Stewart Street, Capitol Complex  
Carson City, Nevada 89701

Subject: Pyramid Highway/US 395 Connection Project, Washoe County, EA: 73391; WA11-009R

Dear Ms. Palmer:

Thank you for meeting with the project team on June 16, 2011 to discuss the Pyramid Highway/US 395 Connection project. As discussed in our meeting, this letter provides additional information about the project to supplement the request for concurrence on the Area of Potential Effect (APE) sent to you May 18, 2011. Specifically, more information on project alternatives that will be evaluated in the Environmental Impact Statement (EIS) and their potential effects are included. Enclosed are maps illustrating the project alternatives and parcels within the APE where impacts to NRHP-eligible or potentially NRHP-eligible resources may occur. At this time, FHWA requests that you review the additional information provided, and concur with FHWA’s determination for the APE for Historic Architectural resources for the proposed project.

Project Description

The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive through the communities of Sparks and Spanish Springs. It also includes an area extending more than approximately 5 miles from Vista Boulevard west to US 395 near the Parr/Dandini interchange through the communities of Sparks and Sun Valley (see enclosed maps).

The project involves converting Pyramid Highway from an existing arterial\(^1\) to a freeway\(^2\) facility, arterial widening, and ancillary improvements from Queen Way to Calle de la Plata Drive, and construction of a new freeway facility and ancillary improvements from Pyramid

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\(^1\) Arterial - A class of roads serving major traffic movements (high-speed, high volume) for travel between major points.

\(^2\) Freeway - A divided arterial highway designed for the unimpeded flow of large traffic volumes. Access to a freeway is rigorously controlled and intersection grade separations are required.
Highway to US 395. Moving from west to east and south to north, the major segments of the project and its alternatives are described below:

**US 395 Interchange**
Improvements involve widening to include one to two auxiliary lanes on US 395 at grade from approximately the McCarran Boulevard interchange north to approximately 1,500 feet north of the Parr / Dandini interchange. To increase interchange capacity, the Parr / Dandini interchange would be replaced at its existing location and grade with a similar diamond-type service interchange. In addition, a new high-speed system interchange approximately 30 feet above the Parr / Dandini interchange would connect US 395 to the Pyramid Highway to the east. No high-speed movements are proposed to the west of US 395. Refer to the enclosed Overview Map and Detail 6 and Detail 7 maps.

**Sun Valley Area**
From the US 395 system interchange, the US 395 Connector would proceed east as a six-lane freeway with sizeable cuts and fills as it crosses the Red Hills north of the Desert Research Institute. As the alignment approaches Sun Valley, it would cross over Sun Valley Boulevard by approximately 30 feet. This crossing can occur at either of two locations: 1) the north crossing at 1st Avenue parallel to an existing powerline corridor, or 2) the south crossing approximately 500 feet north of the Dandini / El Rancho intersection using an undeveloped bluff to the east. Both of these crossing locations would converge at the same general location as they continue east of Sun Valley. Refer to Overview Map and Detail 6 map attached.

In addition to the Sun Valley crossing locations, four interchange options exist. The first two alternatives would be a typical tight diamond interchange connecting directly to Sun Valley Boulevard at one of the two crossing locations described above. The interchange would consist of a bridge approximately 30 feet above the existing Sun Valley Boulevard with ramps to/from the east and west directions, and ramp terminal intersections located about 500 feet apart. Refer to the enclosed Overview Map and Detail 6 map.

The second two alternatives consist of a modified partial cloverleaf service interchange west of Sun Valley proper to reduce potential property displacements. The West of Sun Valley interchange could be located coincident with either the southern or northern crossing of Sun Valley described above. Due to differences in grades, the interchange would consist of loop ramps to/from the west and diamond ramps to/from the east. This would result in a ramp terminal intersection spacing of approximately 1,300 feet. The interchange's location west of existing roadway facilities would require construction of a new two-lane arterial connection to

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3 Capacity - A transportation facility's ability to accommodate a moving stream of people or vehicles in a given time period.
4 Diamond-type interchange - is a common type of road junction, used where a freeway crosses a minor road. The freeway itself is grade-separated from the minor road, one crossing the other over a bridge. Approaching the interchange from either direction, an off-ramp diverges only slightly from the freeway and runs directly across the minor road, becoming an on-ramp that returns to the freeway in similar fashion.
5 High-speed interchange - an interchange designed for speeds over 50 miles per hour.
6 Cuts and fills - In earthmoving, cut and fill is the process of constructing a road whereby the amount of material from cuts roughly matches the amount of fill needed to make nearby embankments, so minimizing the amount of construction labor.
7 Ramp terminal - where highway ramps end in an intersection.

8 Cloverleaf - A cloverleaf interchange is a two-level interchange in which left turns (in countries that drive on the right) are handled by loop ramps (U.S. ramps, UK: slip roads). To go left (in right-hand traffic), vehicles first continue as one road passes over or under the other, then exit right onto a one-way three-fourths loop ramp (270°) and merge onto the intersecting road.
Dandini Boulevard and a four-lane arterial connection to West 1st Avenue. The West of Sun Valley interchange could tie into the planned West Sun Valley Arterial, a regionally significant facility identified in the Washoe RTC Regional Transportation Plan. Located on the side of Red Hill, the West of Sun Valley interchange would be located above- and below-grade, requiring cuts and fills. Refer to the enclosed Overview Map and Detail 6 map.

**Pyramid Corridor Alignments**

East of the Sun Valley Area and north toward Sparks Boulevard, the six-lane US 395 Connector freeway would consist of one of three alignment alternatives: On-Alignment, Off-Alignment, and Ridge Alignment alternatives, as described below:

- The On-Alignment Alternative would continue east over the hills to the existing Pyramid Highway, dividing Sun Valley and Sparks. The existing Pyramid facility would be converted from a four-lane arterial to a six-lane freeway from just north of Disc Drive to Sparks Boulevard. Modified split diamond interchanges are proposed at Disc Drive and Golden View Drive, where the freeway would cross approximately 25 feet to 30 feet above the existing grade and consist of ramp terminal intersections located approximately 350 feet apart. The area between these interchanges would be connected by frontage roads. The frontage roads would parallel the freeway facility, generally be at-grade (retaining wall-separated), and create a project footprint approximately 350 feet to 500 feet wide through this section. The mainline freeway would vary in height throughout this section, from a maximum of 30 feet at interchange crossings, to a minimum of 5 feet between interchanges. Refer to the enclosed Overview Map and Detail maps 3 through 5.

- The Off-Alignment Alternative would avoid many of the property impacts associated with improving the existing developed corridor. This would be accomplished by turning the six-lane freeway facility northward as it approaches the Pyramid corridor from the west. The alignment generally would be just below the eastern ridgeline of the mountains but west of most of the Pyramid corridor development. This would require sizeable cuts and fills as the alignment hugs the ridgeline, which would create visual impacts. An interchange with a westward extension of Disc Drive would be located approximately 0.5 miles west of the commercial core, and an interchange with existing Pyramid Highway would be located approximately 1,500 feet south of Sparks Boulevard. Refer to the enclosed Overview Map and Detail 4 and Detail 5 maps.

- The Ridge Alignment Alternative is similar to the Off-Alignment Alternative, except that it would be located farther to the west behind the eastern ridgeline. The Ridge

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9 **Frontage Roads** - A frontage road (also access road, service road, and many other names) is a non-limited access road running parallel to a higher-speed road, usually a freeway, and feeding it at appropriate points of access (interchanges). In many cases, the frontage road is a former alignment of a road already in existence when the limited-access road was built.

10 **At-grade** - An at-grade intersection is a junction at which two or more transportation axis cross at the same level (or grade).
Alignment Alternative would create fewer visual impacts than the Off-Alignment Alternative, but would be located farther from commercial and residential development. Similar to the Off-Alignment Alternative, the Ridge Alignment Alternative would include an interchange with the Disc Drive extension over 0.5 miles west of the commercial core and with the existing Pyramid Highway approximately 1,500 feet south of Sparks Boulevard. Refer to the enclosed Overview Map and Detail 4 and Detail 5 maps.

The three Pyramid corridor alignment alternatives described above would require additional improvements in this segment of the project area. Disc Drive would be widened from four lanes to six lanes at-grade from Pyramid Highway to Vista Boulevard. In addition, a new six-lane extension of Disc Drive would connect the Pyramid Highway / Disc Drive intersection with a new US 395 Connector / Disc Drive interchange. The exact location and layout of this interchange varies with each Pyramid corridor alignment alternative. The Disc Drive extension would generally be located below the existing grade, varying between 50 feet to 175 feet below grade. In addition, Pyramid Highway would be widened from four lanes to six lanes at-grade between Queen Way and Los Altos.

**Pyramid Northerly Interchanges and Terminus**
One build alternative is being considered from Sparks Boulevard to the north end of the project. It would consist of a six-lane elevated freeway from Sparks Boulevard to just north of the Eagle Canyon / La Posada intersection, and a six-lane arterial at-grade to Calle de la Plata. The freeway would be elevated, and would vary between five feet to ten feet in height between interchanges. Interchanges would consist of the freeway crossing over the local roadway at a height of approximately 25 feet to 30 feet. Refer to Overview Map and Detail maps 1-3 attached.

Interchanges would consist of a split diamond interchange from Sparks Boulevard to Lazy 5 Parkway, connected by frontage roads. The frontage roads would create a 350- to 500-foot-wide overall footprint. The frontage roads would be constructed at-grade and would be separated from the mainline freeway by retaining walls. A split diamond configuration is proposed between the Dolores Drive and Eagle Canyon / La Posada interchanges. The frontage roads would create a 350- to 500-foot-wide overall freeway footprint. The frontage roads would be at-grade and separated from the mainline freeway by retaining walls.

**Other Project Components**
In addition to the roadway improvements described above, other transportation improvements are proposed. These include bicycle/pedestrian facilities, ranging from bicycle lanes and sidewalks to multi-use paths along portions of the alignment. Bicycle facilities would generally be located at the same grade as adjoining roadway improvements. Park-and-Ride lots of approximately one acre are proposed in the southeast quadrant of the Pyramid Highway / Calle de la Plata intersection, the southeast quadrant of the Pyramid Freeway / Eagle Canyon / La Posada interchange, and as a shared lot with the existing Wal-Mart parking lot. Increased transit service and Intelligent Transportation System (ITS) improvements are included, which would have a negligible effect on the project footprint and viewshed.

**Areas of Potential Effect (APE)**
The Archaeological Area of Potential Effect (APE) will be submitted later in the process once more design information is available.

The Historic Architectural Resource APE for direct and indirect impacts includes the project footprint, adjacent parcels, and parcels that might be visually impacted by the project. The direct impacts will be parcels that will experience takes due to construction of the new highway.

The indirect impacts would include visual effects to properties from construction of the transportation facilities. Visual impacts generally exceed in range the auditory impact (traffic noise analyses focus on parcels adjacent to, or one parcel from, the right-of-way). The project is not expected to induce development that would expand the APE beyond those areas stated above. In terms of induced development, this project includes two types of roadway improvements: improvements to existing roads, or construction of new roads. New road construction for this project generally would occur on steeper slopes in BLM-owned property and/or zoned open space. These areas are not likely to be developed in the reasonably foreseeable future due development restrictions and the costs associated with, developing lands on steep slopes, especially when there are currently a large number of vacant commercial buildings available.

New development, as a result of improvements to existing roads, is not expected to exceed the visual APE range because: 1) there is existing available commercial space on Pyramid Highway, 2) the likelihood that development would be commercial along the existing road, 3) development would be as far from the proposed alignment as current development, and 4) the cost of leveling any new parcel in the APE.

The APE includes 702 parcels in the APE and 631 acres (see enclosed maps). The cutoff date for structures warranting further evaluation for eligibility for listing on the National Register of Historic Places (NRHP) is 1971. This 40-year cut-off date may give the Environmental Impact Statement (EIS) a longer “shelf-life.”

Methodology
NDOT reviewed Washoe County Assessors Department data regarding structure age and identified 11 parcels to be included in the visual/historic architectural APE based on the project alternative alignments. A reconnaissance survey of those parcels was conducted in June 2011 from public rights-of-way and other public spaces. The survey attempted to identify the total number of buildings on a parcel and their relationship to each other, gathered basic descriptive data on their materials and methods of construction to the extent possible, and photographed each building when possible.

Next Steps:

- **Prepare Programmatic Agreement:** A Programmatic Agreement (PA) will be prepared that describes the process by which Section 106 will be accomplished for the project, who is responsible, and when activities will take place. This will allow archaeological site recordation to occur after completion of the Draft EIS but prior to completion of the Final EIS. Further, should design changes warrant additional archaeological investigation, the PA would outline the process for completing Section
106 documentation, subsequent to the Record of Decision (ROD). The PA will be appended to the EIS.

- **Archaeology Inventory**: An Archaeological inventory will be conducted according to Class III standards. Recordation and evaluation of sites will use Appendices D and E from the State Protocol Agreement between the Bureau of Land Management, Nevada, and the Nevada State Historic Preservation Office for Implementing the National Historic Preservation Act, Finalized October 26, 2009.

- **Architectural Inventory**: An architectural inventory of the APE will be completed by Western Cultural Resource Management, Inc. The report will evaluate all pre-1972 buildings in the APE using a Historic Resource Inventory Form.

If you have any questions, please feel free to call me at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: C. Cliff Creger, NDOT
uc: Andrew Soderborg, FHWA
October 11, 2011

Abdelmoez Abdalla, Environmental Program Manager
US Department of Transportation
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Re: Architectural Area of Potential Effect and Project Description for
Pyramid Highway/US 395 Connection Project, Washoe County, Nevada
EA: 73391
WA11-009R
SHPO Undertaking Number: 2010-0884

Dear Mr. Abdalla,

The Nevada State Historic Preservation Office (SHPO) has reviewed the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information submitted in correspondence from FHWA dated September 8, 2011 (received September 12th) the project consists of converting Pyramid Highway from an existing arterial to a freeway and constructing a new freeway from Pyramid Highway to US 395.

Area of Potential Effect (APE)
The SHPO concurs with the Architectural APE as defined in the above referenced correspondence and as illustrated in the APE Map Overview.

Project Description
The SHPO has reviewed the expanded project description. Based on the submitted information, including maps and correspondence, the SHPO understands the following. If this understanding is inaccurate, please clarify.

- The Parr/Dandini Interchange, which is labeled on the map, will be replaced with the 395 System Interchange, which is described in the project description.
- Per APE Map Detail 5, Pyramid Highway appears to be labeled as Sun Valley Boulevard.
For future correspondence, please label all alternatives on the maps to ensure that the written correspondence and maps correlate. The SHPO notes that the 3 different Pyramid Corridor Alignments (On, Off, and Ridge) are labeled individually in Map Details 4, 5. However, in the Sun Valley Area, the four different alternatives in Map Detail 6 are not individually identified. Please label Alternatives 1 through 4, should they be referenced in future correspondence.

**Resource Identification**

Regarding *architectural* resources, those constructed in 1972 or earlier will be documented utilizing Nevada’s Historic Resource Information Form (HRIF). The APE includes 702 parcels and 631 acres. Had a buffering system, instead of a parcel system, been utilized to document the APE, perhaps fewer acres or properties would have been surveyed.

Regarding *archaeological* resources, the SHPO notes that the APE and the corresponding inventory will be submitted once the design information is available.

**Programmatic Agreement**

At this time, the SHPO concurs with the *Architectural* APE and awaits a draft copy of the Programmatic Agreement (PA).

If you have questions regarding the architectural contents of this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@nevadaculture.org.

Sincerely,

Rebecca L. Palmer
Deputy State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
August 31, 2012

Abdelmoez Abdalla, Environmental Program Manager
US Department of Transportation
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Re: Additional Information for
Determinations of Eligibility for Pyramid Highway-US 395 Connection Project
Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks Washoe County, Nevada
EA: 73390 & 73391
FHWA: DE-0191(065) & DE-0191(067)
SHPO Undertaking Number: 2010-0884
SHPO Report Number: 8041

Dear Mr. Abdalla,

Thank you for the additional information. The Nevada State Historic Preservation Office (SHPO) has reviewed the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information submitted in correspondence from FHWA dated and received August 3, 2012, the project consists of converting Pyramid Highway from an existing arterial to a freeway and constructing a new freeway from Pyramid Highway to US 395. At this time, the SHPO has been asked to provide comments regarding eligibility only.

The additional information for this project includes a revised historic context and additional documentation in the form of a Historic Resource Inventory Form (HRIF) for the Orr Ditch. This information addresses SHPO's letter dated March 26, 2012. Thank you.

The revised historic context supports resources evaluated under National Register Criterion A, B, and C. Criteria D was not addressed. This survey did not include archaeological survey, and, thus,
no discussion of Criterion D considerations has been developed. The archaeological resources associated with the proposed undertaking will be described and National Register evaluation recommendations made in a separate report (page 32). Criterion D, while most often applied to archaeological districts and sites, can apply to buildings, structures, and objects (National Register Bulletin 15, page 21).

Electronic correspondence (dated June 14, 2012) from Sara Fogelquist (SHPO) Liz Dickey (NDOT), regarding the revised context, indicates that ‘As long as the context evaluates the resources under all criteria and addresses all of the resources within the APE...then the context would appear to support the eligibility recommendations in the HRIFs.’ At this time, the SHPO recommends that the resources identified within the APE remain unevaluated under Criteria D.

Resource Identification
Regarding archaeological resources, the SHPO notes that the APE and the corresponding inventory will be submitted once the design information is available.

Regarding architectural resources, those constructed in 1972 or earlier were documented utilizing Nevada’s Historic Resource Information Form (HRIF). The APE includes 702 parcels and 631 acres. Had the APE been constructed by buffer rather than by parcel the APE would have been more appropriate given the scale and nature of the undertaking (36 CRF 800.15.d).

Based on the submitted information:

Thirty-three resources were documented using Nevada’s Historic Resource Inventory Form (HRIF) and 3 potentially eligible historic districts were identified, including the Sierra Vista Ranch Historic District, the Irtcabal Farm Historic District, and the Trosi Family/Kiley Ranch Historic District. (Please see list below.)

Based on the submitted information, the SHPO concurs with FHWA that the following 8 resources are not individually eligible but are eligible as contributing resources within the Sierra Vista Historic District (SHPO Resource Number: D93):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11946</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11947</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11948</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11949</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>5</td>
<td>B11950</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>6</td>
<td>B11951</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>7</td>
<td>B11952</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>8</td>
<td>B11953</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>
Based on the submitted information, the SHPO concurs with FHWA that the following 4 resources are not individually eligible but are eligible as contributing resources within the Trosi Family/Kiley Ranch Historic District (SHPO Resource Number: 094):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11954</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11955</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11956</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11957</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>

The HRIF completed for the Trosi Family/Kiley Ranch Historic District includes a reference to a previous survey. Finally, another portion of this ranch (Locus 1) has been previously recommended eligible under Criterion D due to its ability to offer significant information pertinent to the research topics detailed in other reports (Peterson and Stoner 2003). This portion of the ranch is outside the current parcel boundary due to subdivision of the ranch and ownership changes during the 2000s. The SHPO notes that per the Architectural Inventory, the cited report completed by Peterson and Stoner was not submitted to SHPO for review (page 59). Please forward a copy of this report for SHPO’s records and reference.

Based on the submitted information, the SHPO concurs with FHWA that the following 10 resources are not individually eligible but are eligible as contributing resources within the Iracabal Farm Historic District (SHPO Resource Number: D94):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
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<tbody>
<tr>
<td>1</td>
<td>B11958</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11959</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11960</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11961</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>5</td>
<td>B11962</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>6</td>
<td>B11963</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>7</td>
<td>B11964</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>8</td>
<td>B11965</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>9</td>
<td>B11966</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>10</td>
<td>B11967</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>

Based on the submitted information, the SHPO concurs with FHWA that the following 2 properties are eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>S820</td>
<td>Eligible, A &amp; B</td>
</tr>
<tr>
<td>2</td>
<td>S828</td>
<td>Eligible, A, B, C</td>
</tr>
</tbody>
</table>
Based on the submitted information, the SHPO concurs with FHWA that the following 10 properties are not eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11968</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>2</td>
<td>B11969</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>3</td>
<td>B11970</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>4</td>
<td>B11971</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>5</td>
<td>B11972</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>6</td>
<td>B11973</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>7</td>
<td>B11974</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>8</td>
<td>B11975</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>9</td>
<td>B11976</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>10</td>
<td>B11977</td>
<td>Not Eligible</td>
</tr>
</tbody>
</table>

Based on the submitted information, the SHPO cannot concur with FHWA that the following resource is not eligible for listing in the NRHP.

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>S821</td>
<td>Unevaluated</td>
</tr>
</tbody>
</table>

Although the consultant recommended the resource (S 821: The Old Pyramid Highway) as eligible under Criteria A, FHWA recommend the resource as not eligible due to diminished integrity.

The HRIF indicates that resource retains its original alignment and that 'Although the segments recorded are in overall fair condition, they are the only known recorded segments of the old highway and are therefore recommended eligible under Criterion A (page 7). The SHPO questions if there are other examples of the Old Pyramid Highway that retain better integrity and that are being preserved.

The architectural inventory indicates that as a form of mitigation for S821 would be the completion of a document to ‘place the impacted segments within the greater context of the highway and they development of the local transportation system’ (page 73). The SHPO questions why this would be completed for mitigation and not completed as part of a context to support an eligibility recommendation for the resource. Another context that might further support an eligibility recommendation for S821 is A Cultural Resource Inventory for the Pyramid Lake Paiute Tribe’s Proposed Pelican Pointe Project, Washoe County, Nevada, which was completed in 2011 by Kautz Environmental. A copy is available at the SHPO upon request.

At this time, the SHPO recommends treating S821 as unevaluated,
The SHPO notes that other resources within the APE were identified but were not evaluated on an HRIF. These resources include the Reno Arch Missionary Church (B11979), the Sparks Christian Church (B11978), and the Gibbons/Van Meter House (B11980), all of which are currently in agency review for a different FHWA project.

**Project Effects**

Although this letter is not intended to address project effects, the SHPO notes that there appears to be a discrepancy between FHWA’s correspondence dated September 8, 2011 and the architectural inventory (revised June 2012), which was submitted with FHWA’s correspondence, dated August 3, 2012.

Per FHWA correspondence (dated 9.8.11):

The project is not expected to induce development that would expand the APE beyond those areas stated above. In terms of induced development, this project includes two types of roadway improvements: improvements to existing roads, or construction of new roads. New road construction for this project generally would occur on steeper slopes in BLM-owners property and/or zoned open space. These areas are not likely to be developed in reasonably foreseeable future due to development restrictions and the costs associated with, developing lands on steep slopes, especially when there are currently a large number of vacant commercial buildings available.

New development, as a result of improvements to existing roads, is not expected to exceed the visual APE range because: 1) there is existing available commercial space on Pyramid Highway, 2) the likelihood that development would be commercial along the existing road, 3) development would be as far from the proposed alignment as current development, and 4) the cost of leveling any new parcel in the APE (page 5).

Per the architectural inventory (revised June 2012):

Other indirect effects anticipated from the proposed transportation improvement project are likely to include further degradation of the setting of the resources due to increased access that can reasonably be expected to lead to greater traffic volumes. Also, further land development (residential and commercial) on the lands near and around the historic properties is anticipated because of increased accessibility offered by the highway improvements. These effects could best be mitigated through the photo-documentation of the historic properties accompanied by intensive archival and oral history research of the three historic districts and the Spanish Springs Valley. Similarly, the cumulative effect of the project is likely to be further urban growth and the degradation of the setting of the historic properties (page 72).

Additionally, regarding the Trosi/Kiley Ranch, per the architectural inventory (revised June 2012):

There are other buildings, including a barn, that were visible from the road and appear to be historically associated with the ranch, but are today outside of the parcel (page 63).
And;

The anticipated view shed alterations at the Trosi Family/Kiley Ranch will involve the introduction of a new intersection and transition from grade level to elevated highway west and northeast of the historic district (page 64).

Based on the information noted above, there appears to be additional, visible resources that were not included in the Area of Potential Effect (APE), given the proposed project description. Although the Programmatic Agreement (PA) for this undertaking is still in draft, the SHPO will require a reevaluation of the APE for visual, audible, atmospheric, and cumulative effects in this document.

If you have questions regarding the architectural contents of this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@shpo.nv.gov.

Sincerely,

Karyn de Duftour
Deputy State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
Re: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada.
EA #73390 & 73391/NDOT # WA11-009/FHWA #DE-0191(065) & DE-019(067)/Undertaking 2010-0884

Dear Dr. Abdalla:

The Nevada State Historic Preservation Office (SHPO) acknowledges receipt of the following submission components for the above-noted undertaking: (1) a Federal Highway Administration (FHWA) transmittal letter, dated September 9, 2015 (received September 15, 2015), (2) a complete copy of the Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada, and (3) a FHWA letter providing further clarification regarding this undertaking, dated September 28, 2015 (received October 2, 2015).

Upon careful review of the correspondence for this undertaking, the SHPO offers the following comments.

General Observations:
It is not clear if FHWA is consulting with our office (1) directly under the regulations, 36 CFR 800, for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, or (2) under the Programmatic Agreement Among the Federal Highway Administration, the Nevada Department of Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Implementation of Federal-Aid Transportation Projects in the State of Nevada (PA). The SHPO also notes that a project-specific Programmatic Agreement exists in draft form that has not been executed. Would the lead federal agency please clarify under which authority the undertaking will proceed?

Per the SHPO letter, dated August 31, 2012, consultation on the area of potential effect (APE) for this undertaking has not been concluded. Furthermore, both FHWA letters dated September 9, 2015 and September 28, 2015 made additional modifications to the project description and design. Per the September 28, 2015 FHWA letter, these modifications have the potential to alter effects to historic properties. This highlights the importance of a definitive, consistent, and well-defined determination of the APE that accounts for all potential direct, indirect, and cumulative effects that may result from this undertaking. As the establishment of an APE is integral to successfully completing all additional steps in the Section 106 process, this must be addressed prior to moving forward.
Archaeology:
The current archaeological inventory report, submitted with the September 9, 2015 FHWA letter, states on p. 8 that File and Literature Search and Preliminary Field Survey: Archaeological Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada contains a more detailed presentation of the following information: (1) a detailed literature search from NVCRIS, the Nevada State Museum, the Bureau of Land Management-Carson City Office, historic records, and historic maps and (2) details on consultation regarding the Nationally Designated Trail corridors within the APE. The information provided in this referenced report should be either summarized in some form within the current archaeological report, or perhaps added as an appendix as it provides information necessary to review this current inventory report and the undertaking as a whole.

Architecture:
The SHPO notes, in our letter of August 31, 2015 to FHWA, that the historic context supports resources evaluated under National Register Significance Criteria A, B, and C, but that Significance Criterion D was not addressed for any of the architectural resources. At that time, the SHPO recommended “that the [architectural] resources identified within the APE remain unevaluated under Criterion D.” As this matter was not addressed by the federal agency in subsequent correspondence, the SHPO looks forward to receipt of FHWA determination regarding this matter.

If it would be helpful, SHPO staff would be happy to participate in a conference call to address any questions concerning this correspondence and undertaking.

Please feel free to contact this office should you have any questions concerning this correspondence, please contact Jessica Axsom at (775) 684-3445 or by e-mail at jaxsom@shpo.nv.gov or SHPO staff architectural historian Mara Thiessen Jones at (775) 684-3439 or by e-mail at mara.jones@shpo.nv.gov.

Sincerely,

Julie H. Ernst, Ph.D., RPA
Deputy State Historic Preservation Officer
April 19, 2017

Ms. Rebecca Palmer
State Historic Preservation Officer
Nevada State Historic Preservation Office
901 S. Stewart Street, Suite 5004
Carson City, Nevada 89701-4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Clarify the Authority under which the Undertaking Will Proceed for Section 106 Compliance, and Request Concurrence on Area of Potential Effects for Historic Architectural and Archaeological Resources
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

As you know, the Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is preparing an Environmental Impact Statement (EIS) to evaluate effects from proposed improvements along Pyramid Highway from Queen Way to Calle de la Plata Drive, in Washoe County to improve the area’s traffic flow. The project also proposes to construct a new connection between US 395 and Pyramid Highway (SR 445) through the Sun Valley area in the northwestern portion of the Reno metro area.

We initiated consultation with the State Historic Preservation Officer (SHPO) for this undertaking in February 2009, and we have continued consultation with the SHPO regarding establishment of the area of potential effects (APEs), and eligibility and effect determinations for historic architectural and archaeological resources. We have also coordinated with your office in the development of a project-specific Programmatic Agreement (PA). Recently, we met with your staff on March 28, 2017 to provide an update on the project and outline a path for completion of the Section 106 process.

The purpose of this letter is to (1) clarify under which authority FHWA is proceeding with Section 106 consultation for the undertaking, and (2) conclude APE consultation for the undertaking. To that end, the following information is provided:

1. Address SHPO’s outstanding questions concerning:
   a. Under which authority the undertaking will proceed to comply with Section 106.
b. Whether the historic architecture direct and indirect APE accounts for the potential visual, audible, atmospheric, and cumulative effects of the undertaking.

2. Summarize the historic architecture direct and indirect APE and the archaeological APE established for the project and request SHPO’s formal concurrence.

Authority under which the Undertaking Will Proceed

In your October 14, 2015 letter, you asked FHWA to clarify under which authority the undertaking will proceed to comply with Section 106 – whether to finalize and follow the draft project-specific PA, to utilize the existing statewide Section 106 PA, or just follow standard Section 106 requirements as outlined in the Advisory Council on Historic Preservation’s regulations in 36 CFR 800. Based on the discussion in our March 28, 2017 meeting with the SHPO and NDOT, FHWA has decided that the undertaking will proceed under the statewide Section 106 PA titled, Programmatic Agreement among the Federal Highway Administration, the Nevada Department of Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding implementation of Federal-Aid Transportation Projects in the State of Nevada (2014). This decision is 1) based on the fact that the project-specific PA has not been fully executed, and the SHPO had additional comments on the PA that would require additional changes to the PA and vetting with PA signatories, which would have schedule implications; 2) based on where we are in the Section 106 process for this project since many of the deliverables and efficiencies outlined in the project-specific PA have been completed; and 3) based on the fact that the statewide PA addresses the Section 106 consultation needs of this project because it captures all parties that are pertinent to this undertaking (including the Bureau of Land Management [BLM] and the U.S. Army Corps of Engineers [USACE]), outlines responsibilities, etc., and largely follows the regulations (e.g., it does not establish expedited review processes or additional requirements).

Historic Architecture APE Descriptions

In your letters dated October 11, 2011, March 28, 2012, and August 31, 2012, you discussed the historic architecture APE; summarized the number of parcels included in the architectural APE; and noted that, had a buffering system been used to document the APE instead of a parcel system, perhaps fewer acres or properties would have been surveyed, and the APE would have been adequate for the scale and nature of the undertaking (36 CFR 800.16 [d]). In your October 11, 2011 letter, you also noted that, at that time, you concurred with the architectural APE. Your August 31, 2012 letter further noted the following concerns that are addressed in this letter. Your comments have been enumerated to aid in following the discussion below.

1. SHPO Comment #1: Discrepancies between FHWA’s September 8, 2011 letter and the Architectural Inventory Report (revised June 2012) regarding the undertaking’s effect on new development. FHWA’s letter indicated that the project is not expected to induce development that would exceed the visual APE range, while the report indicated that further residential and commercial development on lands near and around the historic properties is anticipated because of increased accessibility offered by the highway improvements.
2. **SHPO Comment #2**: The Architectural Inventory Report (revised June 2012) states that there are other buildings, including a barn that were visible from the road and appear to be historically associated with the Trosi/Kiley Ranch, but are today outside of the parcel.

3. **SHPO Comment #3**: The Architectural Inventory Report (revised June 2012) states that the anticipated view shed alterations at the Trosi Family/Kiley Ranch will involve the introduction of a new intersection and transition from grade level to elevated highway west and northwest of the historic district (page 64).

4. **SHPO Comment #4**: Based on the above noted information, there appears to be additional, visible resources that were not included in the APE, given the proposed project description. SHPO will require a reevaluation of the APE for visual, audible, atmospheric, and cumulative effects.

5. **SHPO Comment #5**: In your October 14, 2015 letter to FHWA, you noted that both FHWA letters dated September 9, 2015 and September 28, 2015 made additional modifications to the project description and design, and that per the September 28, 2015 FHWA letter, these modifications have the potential to alter effects to historic properties.

Responses to your concerns are provided below. First, as requested by the SHPO in our March 28, 2017 meeting, a thorough description of the undertaking is attached to this letter (Attachment A) to inform your review of these responses and your review of the historic architecture direct and indirect APE established for the undertaking. The undertaking description summarizes design changes made to the build alternatives between 2015 and early 2017, and describes and illustrates each of the four build alternatives (referred to as Arterial Alternatives) currently being evaluated in the Final EIS. Additionally, the attached maps illustrate the study area, the historic architecture direct and indirect APEs, and the location of the National Register of Historic Places (NRHP)-eligible historic districts discussed in this letter.

Regarding discrepancies noted under SHPO Comment #1 above, FHWA apologizes for the confusion. To clarify, while the Architectural Inventory Report did indicate that the project would result in further land development because of increased accessibility offered by the project, FHWA has a different opinion than that provided by the cultural resources subconsultant. FHWA has determined that the project is not expected to induce development that would expand the APE beyond its current boundaries for the reasons stated in our September 8, 2011 letter, which are summarized here: This project includes two types of roadway improvements – improvements to existing roads and construction of a new road (the US 395 Connector). The types of improvements proposed on existing roads include widening portions of Pyramid Highway and Disc Drive, adding short segments of auxiliary lanes along US 395 at the US 395/Parr Boulevard interchange, realigning Raggio Parkway and Dandini Boulevard, short extensions of West 1st and 2nd Streets in Sun Valley, minor improvements along Sun Valley Boulevard to accommodate the US 395 Connector, and adding bicycle and pedestrian facilities along Pyramid Highway, Disc Drive, and other roads in the vicinity of the US 395 Connector. Improvements also include improving Pyramid Highway as an access-controlled arterial, which includes improvements such as construction of a raised median to limit left-turn access, and modifying existing Pyramid Highway access points to right-in/right-out or eliminating access to Pyramid by terminating current access roads at Pyramid with cul-de-sacs. These proposed
improvements are compatible with surrounding zoning and future land uses. Future growth and development would continue to be market driven and occur in accordance with local land use restrictions regardless of whether this undertaking is implemented. Further, the new road construction would generally occur on steeper slopes on BLM-owned property and/or zoned open space. These areas are not likely to be developed in the reasonably foreseeable future due to BLM and zoning development restrictions, as well as the costs associated with developing lands on steep slopes, especially when commercial space is available along roads that would be improved by the project.

Regarding SHPO Comments #2 through #4, it is FHWA’s understanding that the “other buildings” referenced in the Architectural Inventory Report include those located east of the Trosi/Kiley Ranch Historic District (SHPO Resource Number D94). FHWA has determined that the proposed improvements along Pyramid Highway, which include a grade-separated interchange at Pyramid Highway/Sparks Boulevard northwest of the Trosi/Kiley Ranch Historic District, would be visually indistinguishable from the northwestern-most boundary of the Trosi/Kiley Ranch Historic District (refer to historic architecture APE discussion later in this letter for more information). Regarding the statement in the Architectural Inventory Report that the view shed alterations at the ranch “will involve the introduction of a new intersection and transition from grade level to elevated highway west and northwest of the historic district,” it is correct that a grade-separated interchange at Pyramid Highway/Sparks Boulevard located northwest of the ranch is still proposed, but grade-separated interchanges are no longer proposed north of Sparks Boulevard. In that portion of the project, at-grade improvements are proposed, including road widening, access changes, and signalized intersections that would not be visible from the ranch due to its distance from the proposed improvements and area topography. Based on the above, proposed improvements would be visually indistinguishable to buildings located east of the ranch. Therefore, the historic architecture direct and indirect APE boundary located at the eastern edge of the Trosi/Kiley Ranch Historic District adequately encompasses the visual effects of the undertaking. If upon further evaluation additional outbuildings were to be included in this historic district, or if the boundaries of the district were to extend farther to the north or east, such changes would not alter the APE, the eligibility, or the effect of the project on this property.

In response to SHPO comment #5, please note that design changes made to the build alternatives have resulted in a reduced project footprint overall, and eliminated grade-separated interchanges previously proposed on Pyramid Highway, north of Sparks Boulevard. The design changes have essentially resulted in a narrowing/scaling down of the project, thus reducing visual impacts overall. As such, effects to cultural resources have changed as a result of design changes – the effects have been reduced. For example, due to design changes, the project would impact fewer linear feet of the Prosser Valley Ditch (WA5234, WA6134 and SHPO Resource Number S820), and the previously proposed grade-separated interchange at Pyramid Highway/Dolores Drive west of the Sierra Vista Ranch Historic District (SHPO Resource Number D93) is no longer proposed, reducing visual effects to that historic resource.
Reevaluation of the Historic Architecture Direct and Indirect APE

To address the SHPO’s concerns regarding the historic architecture direct and indirect APE, FHWA reevaluated that APE to confirm that it encompasses visual, audible, atmospheric, and cumulative effects of the undertaking.

Regarding your overall concerns about the historic architecture direct and indirect APE, as a result of design changes made after the 2013 Draft EIS, the Arterial Alternatives would have reduced visual and audible effects compared to the Build Alternatives evaluated in the Draft EIS. Also, all of the Arterial Alternatives maintain the same alignment as the Draft EIS build alternatives.

The visual effects of the undertaking were the main driver for determining the extent of the parcel-based direct and indirect historic architecture APE because visual impacts generally extend farther than auditory or atmospheric impacts. The air quality analysis conducted for the EIS found that none of the arterial alternatives would cause an exceedance of the U.S. National Ambient Air Quality Standards (NAAQS) established by the U.S. Environmental Protection Agency under authority of the Clean Air Act (42 U.S.C. 7401 et seq.) that apply for outdoor air throughout the country. Further, improved transportation operations under the arterial alternatives would result in improved air quality compared to the No Action Alternative. Therefore, this APE reevaluation focuses on visual effects of the undertaking to verify the appropriateness of the historic architecture direct and indirect APE boundary. The following discussion compares the detailed project description of the current undertaking (see Attachment A) against known historic properties to verify that the parcel-based direct and indirect APE limits are appropriately established and to illustrate the reduction in impacts to these resources.

Between Sparks Boulevard and Calle de la Plata, previously-proposed grade-separated interchanges on Pyramid Highway at Eagle Canyon Drive/La Posada Drive and Dolores Drive are no longer proposed (refer to Figure 1 in Attachment A). In this segment of Pyramid Highway, at-grade improvements include road widening, access changes at cross-streets, the addition of bicycle and pedestrian facilities, and traffic signal controls at the following intersections where no traffic signals currently exist:

- Calle de la Plata: Full movement signalized intersection with reconfigured lanes.
- Egyptian Drive/Sunset Springs Lane: Full movement signalized intersection with reconfigured lanes.
- Dolores Drive: Full movement, signalized intersection with reconfigured lanes.

Traffic signal poles and roadway light poles would introduce new vertical visual elements at the above-listed intersections, and introduce new sources of light during nighttime hours. Vertical elements that currently exist along Pyramid Highway include commercial and residential developments, as well as power poles, power lines, and roadway signage along the road. These vertical elements located along Pyramid Highway and farther distant from the roadway currently produce light impacts during nighttime hours. Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.
Sierra Vista Ranch Historic District: All Arterial Alternatives would result in reduced visual effects to the Sierra Vista Ranch Historic District due to the elimination of the previously proposed grade-separated intersection at Pyramid Highway and Dolores Drive. Instead, the intersection would remain at-grade and traffic signals with street lights would be added. The proposed feeder road running southeast from the new intersection would still be provided under the design changes made. Before design changes were made, the proposed improvements would have introduced new visual elements into the setting of the site. However, these visual and audible effects were determined to be avoided by modifying the design to include the planting of one or more lines of trees along the western boundary of the district to form a living visual barrier between the district and Pyramid Highway. The recent design changes include elimination of the grade-separated Pyramid/Dolores interchange and installing traffic signals. Based on their height and thinness, street lights would not be visually distinguishable beyond approximately 800 feet. The northwestern-most boundary of the Sierra Vista Ranch Historic District is located approximately 1,890 feet from the Dolores Drive/Pyramid intersection, which is well beyond the point where traffic signals and lighting would be visually distinguishable. Therefore, the indirect APE in this area is adequate.

Trosi Family/Kiley Ranch Historic District: All the Arterial Alternatives have Pyramid Highway crossing over Sparks Boulevard. Interchange entry and exit ramps would provide access between Pyramid Highway and Sparks Boulevard. The proposed Pyramid Highway bridge roadway surface is 25 feet above the Sparks Blvd roadway surface. This elevation represents the maximum roadway height over the existing ground at this location. The thickness of the bridge is 8 feet, allowing for the standard 16 feet of clearance. The elevation of Sparks Boulevard would remain at the existing grade. The edges of the bridge would be lined with a 42-inch-tall solid concrete railing, according to NDOT standard.

Lighting: NDOT typically uses Type 7 Poles for this type of interchange. The height of the pole is 32 feet 4 inches above the roadway surface. Three poles would be placed at each ramp gore for a total of 12 poles. Additional poles would be placed along Sparks Blvd and Highland Ranch Pkwy prior to the interchange intersections similar to what is present today. There would be no lights on the bridge itself and given the rural residential location, high mast lighting is not anticipated. The approximate heights of the light poles for the ramps at their proposed location above the existing ground would be as follows:
- Northbound off-ramp: 52 feet
- Northbound on-ramp: 50 feet
- Southbound off-ramp: 41 feet
- Southbound on-ramp: 43 feet

The heights given account for both the pole height and proposed roadway improvements and represent the tallest elements at the interchange.

Two traffic signals would be installed – one at each interchange intersection. Each of the signal poles would include a street light on the top. These poles would be similar in height to the Type 7 poles. The elevation of the signals and lights would be very similar to those at the existing Sparks Boulevard intersection.
Signing: The project would include signing in advance of the interchange. Overhead signs would be placed prior to the ramp exits. The tops of these signs would be approximately 25 feet above the roadway surface.

Below is a visual approximation of how the proposed Pyramid Highway/Sparks Boulevard grade-separated interchange would appear as viewed from the northwestern boundary of the Trosi/Kiley Ranch Historic District located approximately 800 feet southeast of the proposed interchange:
As shown in the visual simulation above, the interchange would be visually indistinguishable from the northwestern boundary of the ranch located approximately 800 feet southeast of the interchange. Therefore, the proposed interchange would be visually indistinguishable from the northernmost buildings within the district that are located approximately 1,165 away from the interchange. As such, the proposed interchange would be visually indistinguishable from areas east of the Trosi/Kiley Ranch Historic District as well.

Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.

**Iratacabal Farm Historic District:** Proposed improvements with the potential to result in visual effects to this district include widening along Disc Drive and construction of a Disc Drive/US 395 Connector interchange.

Below is the view from the northern portion of the district toward Disc Drive, located approximately 1,260 feet north of the district. As shown, Disc Drive is visually indistinguishable from the district. Therefore, the at-grade improvements proposed along Disc Drive would not be visible from the district:
Below is the view from the northern portion of the district toward the Pyramid Highway/Disc Drive intersection, located approximately 5,500 feet west-northwest of the district. As shown, the intersection is currently visually indistinguishable from the district. Based on the Pyramid/Sparks Boulevard grade-separated interchange visual simulation that illustrates that the interchange is visually indistinguishable from approximately 800 feet away, a grade-separated Pyramid Highway/Disc Drive interchange would be visually indistinguishable from the Iratcabal Farm Historic District located over one mile east of the proposed interchange.
Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.

**Summary of Historic Architecture and Archaeological APEs**

- The historic architecture direct APE includes the footprint for all arterial alternatives. The historic architecture indirect APE includes adjacent parcels and parcels that might be visually, audibly, or cumulatively impacted by the project. This parcel-based APE extends from the direct impact footprint in areas where above-grade improvements such as grade-separated interchanges are proposed that could potentially result in visual impacts. The indirect APE encompasses indirect effects, including potential visual, audible, atmospheric, and cumulative effects of the undertaking. The direct and indirect APEs are shown on the attached maps.

- The direct archaeological APE consists of the footprint of the identified Preferred Alternative plus a 100-foot buffer on both sides of the footprint to account for minor design changes that may occur during final design and temporary construction easements. The Preferred Alternative will be identified once the Final EIS updates are completed, which is anticipated to occur end of May or June 2017.

We request your concurrence with the archaeological APE described above, and the historic architecture direct and indirect APE described above and shown on the attached figures. This information has been forwarded concurrently to the following consulting parties for review:
Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California. We will notify you of any responses received from these groups.

If you have any questions please contact me at 775-888-7666.

Sincerely,

C. Cliff Creger
Chief Cultural Resources Program Manager

Enclosures:
Attachment A: Description of Undertaking
Attachment B: Map of Study Area, APE, and NRHP Eligible Historic Architecture Resources

cc: Abdelmoez Abdalla, FHWA
    Jin Zhen, FHWA
    Dale Wegner, FHWA
    Greg Novak, FHWA
    Pyramid Lake Paiute Tribe
    Reno-Sparks Indian Colony
    Washoe Tribe of Nevada and California
    Doug Maloy, RTC
    Jim Clarke, Jacobs
Attachment A – Description of Undertaking
This document summarizes project changes that occurred after the Draft Environmental Impact Statement (Draft EIS) was distributed in August 2013 that lead to the design changes made to the build alternatives that are being fully evaluated in Final EIS. The project changes include reductions in forecasted traffic as a result of updated traffic data that became available after the Draft EIS, and the build alternatives reevaluation and rescreening that was conducted and design changes made as a result of the reduced traffic forecasts. The most notable design changes made to the build alternatives after the Draft EIS was distributed include changing the proposed roadways from freeway-type facilities to arterial-type facilities, reducing the build alternative footprints in some areas, and eliminating some grade-separated interchanges previously proposed under the build alternatives evaluated in the Draft EIS. Under the design changes, all of the build alternatives follow the same alignments.

PROJECT CHANGES MADE AFTER THE AUGUST 2013 DRAFT EIS

Revised Traffic Forecasts

While the Preferred Alternative was being identified and vetted after reviewing and consideration of comments received on the Draft EIS, RTC was adopting a new regional traffic model. This new model used updated population and employment projections from a new Consensus Forecast from the Truckee Meadows Regional Planning Agency that replaced the Interim Consensus Forecast (ICF) used for the Draft EIS traffic analysis. In general, the population and employment in the region were forecasted to be lower, and the areas of population and employment growth changed to be more consolidated than the prior ICF estimates. As a result, the forecasted volumes from the updated travel demand models were also generally lower than the previously forecasted volumes documented in the Draft EIS.

The reduction in traffic forecasts was significant enough for the Study team to revisit the design of the build alternatives. It was found that the reduced traffic demand changed the type of highway facility needed to address the purpose and need of the project. The Study team concluded that an arterial facility in lieu of a freeway facility (which was included in the build alternatives evaluated in the Draft EIS) could provide adequate capacity for the projected traffic volumes. Because the design criteria for an arterial facility are different than those required for a freeway facility, the Study team modified the design criteria for the build alternatives to that of an arterial facility, including the cross-section width, design speed, access control, and acceptable grades. This effort resulted in a cumulative reduction in the footprint of the build (“freeway”) alternatives that were fully evaluated in the Draft EIS.

Design speeds for arterial facilities are typically lower than those associated with a freeway, allowing for a tighter geometric design. Therefore, the design speed for the “arterial” type build alternatives was modified. The build alternatives now include a design speed of 55 miles per hour (mph) for Pyramid Highway, 60 mph design speed for the US 395 Connector, and 45 mph design speed for the Disc Drive Extension. These slight reductions to the design speeds allowed for development of a narrower roadway, which would reduce impacts and costs.

A traffic analysis was then conducted for each intersection to confirm if grade-separated interchanges were still necessary. Under all revised build (“arterial”) alternatives, all previously proposed grade-separated interchanges along Pyramid Highway north of Sparks Boulevard were deemed unnecessary and were eliminated. All the arterial alternatives would still require grade-separated interchanges at: US 395, at or near Sun Valley Boulevard, and Highland Ranch.
Parkway/Sparks Boulevard. The revised off alignment and ridge alignment (Arterial Alternatives 1 and 3, respectively) each would require a directional interchange where they connect with Pyramid Highway. The revised on alignment (Arterial Alternatives 2 and 4) would require additional interchanges at Disc Drive, Los Altos Parkway, Golden View Drive, and Sparks Boulevard.

All previously proposed frontage roads along Pyramid Highway were also eliminated.

The following sections describe the four build alternatives (referred to as Arterial Alternatives) that were modified after the Draft EIS as a result of reduced traffic forecasts.

**Arterial Alternatives – Common Elements**

Each of the Arterial Alternatives would improve 7.7 miles of Pyramid Highway from Queen Way north to Calle de la Plata Drive through the communities of Sparks and Spanish Springs. The alternatives differ regarding alignments for the new east-west US 395 Connector, US 395 Connector interchange locations, and road cross-sections through parts of the Study Area.

In addition to road improvements, each Arterial Alternative includes bicycle and pedestrian facilities; increased transit services, including park-and-rides; and Intelligent Transportation Systems (ITS). ITS uses advanced applications of electronics and communications, such as enhanced traveler information and variable message signs, to improve traffic operations and increase roadway effectiveness. North of Sparks Boulevard, all Arterial Alternatives follow the same alignment along the existing Pyramid Highway. Figure 1 shows the elements common to all Arterial Alternatives.

**Roadway Improvements**

Each Arterial Alternative would include a new arterial facility and ancillary improvements from Pyramid Highway to US 395, through the Sun Valley area. Arterial improvements are designed to carry traffic directly to US 395 via the US 395 Connector rather than along the existing Pyramid Highway to McCarran Boulevard. Both the US 395 Connector and Pyramid Highway segments north to Calle de la Plata Drive would be constructed as a high speed, access controlled primary arterial highways with a combination of interchanges and at-grade intersections at certain major intersecting roadways. Note that the term “high speed” refers to a design speed of over 45 mph.

Arterial design elements along Pyramid Highway include installing a raised median island to separate directions of travel and limit left-turn access. The US 395 Connector includes an unpaved median, and barrier rail only at select locations where required to meet clear zone distances. Immediately east of US 395, all the arterial alternatives would include barrier rail on both the outside shoulders and in the median, mostly due to topographic constraints.

The existing US 395/Parr Boulevard service interchange would be reconstructed and reconfigured to accommodate a new directional system interchange for the US 395 Connector. Raggio Parkway, Dandini Boulevard, and Spectrum Drive would be realigned in this area to accommodate the interchange improvements and provide improved access to the DRI and TMCC campuses.
Each Arterial Alternative would have the following cross-sections:

- Four-lane arterial
  - Along Pyramid Highway between Calle de la Plata and Eagle Canyon Drive/La Posada Drive.
• Six-lane arterial
  ◦ Along Pyramid Highway between Eagle Canyon Drive/La Posada Drive and Sparks Boulevard/Highland Ranch Parkway.
  ◦ Along Pyramid Highway between Disc Drive and Queen Way. The proposed lanes would match the improvements currently being constructed for the Pyramid Highway/McCarran intersection under a separate project.
  ◦ Along Disc Drive between Pyramid Highway and Sparks Boulevard.

• Five-lane Arterial
  ◦ Along Disc Drive between Sparks Boulevard and Vista Boulevard

Each Arterial Alternative would include grade-separated interchanges at the following locations:

• Sparks Boulevard/Highland Ranch Parkway: diamond interchange.

To accommodate the proposed Pyramid Highway improvements, each Arterial Alternative would modify the following major roadway accesses at Pyramid Highway, listed north to south:

• Calle de la Plata: Full movement signalized intersection with reconfigured lanes.
• Egyptian Drive/Sunset Springs Lane: Full movement signalized intersection with reconfigured lanes
• West Sky Ranch Boulevard: Eliminates left turn access; change to right-in/right-out access only.
• Eagle Canyon Drive/La Posada Drive: Full movement, signalized intersection with reconfigured lanes.
• Robert Banks Boulevard: Eliminates left turn access; change to right-in/right-out access only.
• David James Boulevard: Eliminate Pyramid Highway access and build cul-de-sac because of proximity to Dolores Drive.
• Dolores Drive: Full movement, signalized intersection with reconfigured lanes.
• Lazy 5 Parkway: Full movement, signalized intersection with reconfigured lanes.
• Kiley Parkway: Eliminate Pyramid Highway access and build cul-de-sac because of proximity of the Sparks Boulevard interchange.
• Disc Drive: Full movement, signalized intersection with reconfigured lanes to accommodate improvements.

In addition to access changes at major roadways, access to Pyramid Highway will be changed to right-in/right-out only at the following locations:

• Commercial driveways just north of Eagle Canyon Road
• Driveways between Robert Banks Boulevard and Eagle Canyon Drive
• Various driveways between Lazy 5 Parkway and Tierra del Sol
The existing right-in/right-out access at Tierra Del Sol Parkway and Spanish Springs Library will be maintained. Minor changes will be made at these locations as necessary to tie into the improved Pyramid Highway.

Changes to commercial access along Disc Drive east of Pyramid Highway are also common to all arterial alternatives. These changes include eliminating left-turn access to the shopping center located on the north side of Disc Drive between Sparks Boulevard and Vista Boulevard; driveways will become right-in/right-out access only.

Each Arterial Alternative would include construction of auxiliary lanes on US 395 between the US 395 Connector and McCarran Boulevard.

Each Alternative would also eliminate the existing Dandini Drive connection to Sun Valley Boulevard and provide new connections between Raggio Parkway and Sun Valley Boulevard by extending West 1st Avenue and West 2nd Avenue to the west to intersect Raggio Parkway.

**Bicycle and Pedestrian Improvements**

Each Arterial Alternative would include construction of a shared-use path along Pyramid Highway between Calle de la Plata and Disc Drive. This path would continue west from Disc Drive to Sun Valley Boulevard along the US 395 Connector alignment. At Sun Valley Boulevard, the shared-use path would separate from the US 395 Connector and be accessed using the existing local street facilities along Sun Valley Boulevard and Dandini Drive. The shared-use path continues west as an extension of Dandini Drive just west of Sun Valley Boulevard to the intersection of Raggio Parkway and Dandini Drive. Bike lanes and sidewalks on both Raggio Parkway and Dandini Drive would be provided to allow bicyclists and pedestrians access to the TMCC, DRI campuses, and Parr Boulevard. These facilities would improve existing connectivity because Dandini Drive does not currently provide bike lanes or sidewalks.

Other bicycle and pedestrian improvements would occur along the extensions of West 1st and 2nd Avenues. Both of these streets would be repaved, restriped for bike lanes, and sidewalks provided as required to comply with the Americans with Disabilities Act (ADA).

**Transit Improvements**

Each Arterial Alternative would include the addition of regional bus service along Pyramid Highway and Prater Boulevard between Calle de la Plata and the RTC Centennial Plaza, to serve corridor demand consistent with the service standards of RTC. The arterial alternatives also would include construction of transit/carpool lots near the Pyramid Highway alignment at Calle de la Plata, Eagle Canyon Drive/La Posada Drive, and Los Altos Parkway. At Calle de la Plata, the lot would be located in the southeast quadrant of the intersection; at Eagle Canyon/La Posada Drive, the lot would be located in the southeast quadrant of the intersection; at Los Altos, the lot would be shared with the Walmart parking lot, requiring coordination with Walmart. If Walmart does not agree to share the parking lot, an alternate site may be identified during final design.

**Bridges**

Each Arterial Alternative would include construction of many structures in the Study Area. Bridges and retaining walls would be built or modified to accommodate the proposed improvements. Bridges would be required at each interchange along the corridor. The bridges included in each Arterial Alternative are listed below. Because of the high number of bridges and the design effort required for each, bridge design will continue during final design.
The proposed bridges are listed below in order, beginning at the US 395 interchange in the western portion of the study area, then moving east toward Pyramid Highway, then moving north along Pyramid Highway to Call de la Plata.

**• Bridges Common to all Arterial Alternatives**
- US 395 Interchange at Parr Boulevard
  - Parr Boulevard over US 395 (replacement of existing structure)
  - Raggio Parkway over NE Ramp (NE = North to East)
  - WS Ramp over US 395
  - WS Ramp over Raggio Parkway
  - WS Ramp over R-1 Ramp (On ramp from Parr Boulevard/Raggio Parkway to the US 395 Connector.
  - WS Ramp over P-2 Ramp (Parr service interchange north off ramp)
- Pyramid arterial over Sparks Boulevard

**• Arterial Alternative 1 (Total Structures for Alternative 1 = 12)**
- Raggio Parkway over US 395 Connector arterial
- US 395 Connector arterial over Sun Valley Boulevard
- US 395 Connector arterial over Leon Drive
- US 395 Connector arterial over Disc Drive westbound on ramp
- US 395 Connector Py-2 (Southbound off ramp to Pyramid)

**• Arterial Alternative 2 (Total Structures for Alternative 2 = 14)**
- Raggio Parkway over US 395 Connector arterial
- US 395 Connector arterial over Sun Valley Boulevard
- Northbound Direct Connect ramp over US 395 Connector arterial
- Northbound Direct Connect ramp over Pyramid arterial
- Pyramid arterial over Los Altos Drive
- Northbound Direct Connect ramp over Los Altos Parkway
- Southbound Direct Connect ramp over Los Altos Parkway

**• Arterial Alternative 3 (Total Structures for Alternative 3 = 11)**
- West Sun Valley Interchange:
  - Raggio Parkway over US 395 Connector arterial
- US 395 Connector arterial over Sun Valley Boulevard
- US 395 Connector arterial over Disc Drive westbound on ramp
- US 395 Connector arterial Py-2 (Southbound off ramp to Pyramid)

**• Arterial Alternative 4 (Total Structures for Alternative 4 = 15)**
- West Sun Valley Interchange:
  - Raggio Parkway over US 395 Connector arterial
- US 395 Connector arterial over Sun Valley Boulevard
- US 395 Connector freeway over Leon Drive
- Northbound Direct Connect ramp over US 395 Connector arterial
- Northbound Direct connect ramp over Pyramid arterial
- Pyramid arterial over Los Altos Drive
- Northbound Direct Connect ramp over Los Altos Parkway
- Southbound Direct Connect ramp over Los Altos Parkway
Retaining Walls, Traffic Noise Barriers, and Screening Walls

Retaining walls would be constructed where necessary along the corridor to allow construction of the interchanges or to eliminate or minimize impacts. Table 2 lists proposed retaining wall locations at the current level of preliminary design. The exact location and design of retaining walls will be determined during final design.

Traffic noise barriers would be constructed to mitigate traffic noise impacts per regulation and policy. Recommendations for traffic noise barriers will be made once the traffic noise analysis being conducted for the Final EIS is completed.

Screening walls would be constructed to mitigate visual impacts in Environmental Justice (low-income and minority populations) areas caused by construction of proposed roadway improvements, if such screening walls are supported by the affected neighborhoods. Visual screening also could be provided by earthen berms built using excess earthwork material. This visual screening also might provide some traffic noise reduction.

Water Quality and Drainage Improvements

Each Arterial Alternative would include construction of water quality and drainage improvements. These would include the construction, or replacement, of culverts, inlets, and ditches along the impacted roadways, as well as the construction of permanent water quality basins. The number of facilities required by the Arterial Alternatives is summarized below.

<table>
<thead>
<tr>
<th>Arterial Alternative</th>
<th>Culverts</th>
<th>Ditches</th>
<th>Water Quality Ponds—Number (Cumulative Approximate Acre-Feet)</th>
<th>Ditch/ Channel Relocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative 1</td>
<td>37</td>
<td>23</td>
<td>10 (54)</td>
<td>1</td>
</tr>
<tr>
<td>Alternative 2</td>
<td>24</td>
<td>22</td>
<td>11 (55)</td>
<td>2</td>
</tr>
<tr>
<td>Alternative 3</td>
<td>34</td>
<td>28</td>
<td>10 (57)</td>
<td>1</td>
</tr>
<tr>
<td>Alternative 4</td>
<td>27</td>
<td>21</td>
<td>11 (54)</td>
<td>2</td>
</tr>
</tbody>
</table>

In general, water quality ponds would be located at existing low-lying areas along the Arterial Alternatives. These existing low areas include near the US 395 interchange, in Sun Valley, near the south end of Wedekind Park, along Disc Drive, near Kiley Parkway, north of Lazy 5 Parkway, and south of Eagle Canyon/La Posada Drive.
<table>
<thead>
<tr>
<th>Interchange</th>
<th>Arterial Alternative</th>
<th>Location</th>
<th>Approx. Length</th>
<th>Approx. Average Height</th>
<th>Approx. Maximum Height</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 395/ Parr Blvd./ US 395 Connector System Interchange</td>
<td>All Arterial Alts.</td>
<td>Along Parr service southbound on-ramp</td>
<td>380 feet</td>
<td>16 feet</td>
<td>37 feet</td>
<td>This wall has significant variations in height due to the grading of the surrounding properties. Placed to minimize right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along US 395 westbound to southbound system on-ramp</td>
<td>450 feet</td>
<td>5 feet</td>
<td>10 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along southbound US 395 just north of Sutro Street</td>
<td>640 feet</td>
<td>10 feet</td>
<td>15 feet</td>
<td>Placed to minimize right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along southbound US 395 at ramp bridge</td>
<td>260 feet</td>
<td>22 feet</td>
<td>22 feet</td>
<td>Placed along bridge abutment.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Between two ramps</td>
<td>850 feet</td>
<td>12 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td>Sun Valley</td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R1 ramp</td>
<td>1420 feet</td>
<td>18 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R2 ramp</td>
<td>420 feet</td>
<td>6 feet</td>
<td>13 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R4 ramp</td>
<td>1175 feet</td>
<td>10 feet</td>
<td>16 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R1 ramp</td>
<td>425 feet</td>
<td>33 feet</td>
<td>48 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R2 ramp</td>
<td>295 feet</td>
<td>5 feet</td>
<td>8 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R3 ramp</td>
<td>400 feet</td>
<td>20 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R4 ramp</td>
<td>750 feet</td>
<td>30 feet</td>
<td>42 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Sun Valley south of Rampion Way Crossing at Leonesio Drive</td>
<td>256 feet</td>
<td>10 feet</td>
<td>18 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 3</td>
<td>Wall along R3 ramp</td>
<td>660 feet</td>
<td>30 feet</td>
<td>35 feet</td>
<td>Wall to avoid impacts to the Prosser Valley Ditch</td>
</tr>
<tr>
<td></td>
<td>All Arterial Alts.</td>
<td>Wall along W. 1st Avenue at Lois Allen Elementary School for the West of Sun Valley Interchange</td>
<td>320 feet</td>
<td>11 feet</td>
<td>19 feet</td>
<td>Minimizes impacts to the playground area and driveway access to Lois Allen Elementary School.</td>
</tr>
</tbody>
</table>
## Table 2: Proposed Retaining Wall Locations for Arterial Alternatives

<table>
<thead>
<tr>
<th>Interchange</th>
<th>Arterial Alternative</th>
<th>Location</th>
<th>Approx. Length</th>
<th>Approx. Average Height</th>
<th>Approx. Maximum Height</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pyramid Highway</td>
<td>All Arterial Alts.</td>
<td>Wall along shared-use path</td>
<td>315 feet</td>
<td>15 feet</td>
<td>28 feet</td>
<td>Wall to avoid large cut</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>Arterial Alt. 1</td>
<td>Wall behind Walmart</td>
<td>435 feet</td>
<td>24 feet</td>
<td>40 feet</td>
<td>Wall height varies significantly to mitigate impacts to existing cut slope behind Walmart.</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>Arterial Alts. 1 and 3</td>
<td>Pyramid Highway between Disc Drive and Los Altos Parkway</td>
<td>610 feet</td>
<td>4 feet</td>
<td>6 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>Arterial Alts. 1 and 3</td>
<td>Pyramid Highway south of Golden View</td>
<td>800 feet</td>
<td>8 feet</td>
<td>12 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>Arterial Alts. 2 and 4</td>
<td>Wall along Pyramid Highway north of Golden View Drive</td>
<td>860 feet</td>
<td>6 feet</td>
<td>13 feet</td>
<td>Placed to minimize right-of-way acquisition.</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>Arterial Alts. 2 and 4</td>
<td>Seven individual walls along Los Altos Ramps</td>
<td>Varies</td>
<td>Varies</td>
<td>Varies</td>
<td>All Walls Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>Arterial Alts. 2 and 4</td>
<td>Wall along Disc NB direct connect ramp</td>
<td>280 feet</td>
<td>17 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>Arterial Alts. 2 and 4</td>
<td>Wall along Disc NB direct connect ramp</td>
<td>310 feet</td>
<td>15 feet</td>
<td>30 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>All Arterial Alts.</td>
<td>Pyramid Highway just north of Queen Way</td>
<td>200 feet</td>
<td>6 feet</td>
<td>6 feet</td>
<td>This wall protects against impacts to the Orr Ditch</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>All Arterial Alts.</td>
<td>Pyramid Highway just south of Wedekind Park</td>
<td>500 feet</td>
<td>15 feet</td>
<td>28 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
</tr>
<tr>
<td>Pyramid Highway</td>
<td>All Arterial Alts.</td>
<td>Disc Drive between Sparks Boulevard and Vista Boulevard, south side</td>
<td>1200 feet</td>
<td>6 feet</td>
<td>10 feet</td>
<td>This wall will likely be higher than indicated but any additional height will be used as a traffic noise barrier instead of a retaining wall. Placed to avoid right-of-way acquisition.</td>
</tr>
</tbody>
</table>
Earthwork refers to the excavation and embankment of earth associated with construction. At this time, specific locations for temporary or permanent storage of excess material have not been identified. It is anticipated that much of the material can be stockpiled or disposed of throughout the project limits using a variety of methods and concepts. Off-site hauling of excess material is an option but would increase the overall project cost. Concepts for handling or reducing excess material include:

- Using excess material within other areas within the project limits where fill material is needed.
- Flattening major fill slopes along roadways as a way to increase reuse of excess material.
- Steepening cut slopes along roadways where material is found to be stable.
- Placing material along roadside shoulders to create visual screening barriers.
- Placing material within the infield areas between ramps of areas at interchanges.
- Placing material in support of third party master plan developments.
- Using material to develop and advance proposed regional parks.
- Infilling expended portions of material pits located near the project limits.
- Refining roadway alignment elevations as part of future designs.
- Placing walls in strategic locations to reduce major cuts.

Arterial Alternative Elements in Addition to Common Elements

This section describes elements of each arterial alternative in addition to those described under Common Elements. For reference, Table 3 summarizes the major design elements of each Arterial Alternative.

Table 3  Major Elements of Arterial Alternatives

<table>
<thead>
<tr>
<th>Design Element</th>
<th>Arterial Alt. 1</th>
<th>Arterial Alt. 2</th>
<th>Arterial Alt. 3</th>
<th>Arterial Alt. 4</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Alignment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Off Alignment</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>On Alignment</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Ridge Alignment</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td><strong>Interchange in Sun Valley</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sun Valley Interchange</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>West Sun Valley Interchange</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td><strong>Sun Valley Boulevard Crossing Location</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>North Crossing (Rampion Way)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Crossing (south of Rampion Way)</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
**Arterial Alternative 1**

Arterial Alternative 1 shown on Figure 2 would be an off alignment just west of the existing Pyramid Highway between the US 395 Connector and Highland Ranch Parkway. This alignment would be located just below the ridgeline of the mountains, west of Walmart. Of the two alternative alignments through Sun Valley, Arterial Alternative 1 would follow the more northern Rampion Way crossing and would include an interchange at Sun Valley Boulevard. For the length of the arterial segment from Highland Ranch Parkway and along the new US 395 connector to US 395, the typical cross-section would be a four-lane arterial, with auxiliary and/or truck lanes provided where warranted by travel demand or grade.

Changes to the local street network in Sun Valley are required as part of the Arterial Alternative 1 and include the widening of Sun Valley Boulevard, the elimination of Rampion Way, and the extension of Leon Drive north to East 1st Avenue. Some driveways along Sun Valley Boulevard would be modified to right-in/right-out only as a result of raised median islands to accommodate the interchange improvements.

Arterial Alternative 1 would have three interchanges, in addition to those common to all alternatives, at the following locations:

- Sun Valley Boulevard: diamond interchange
- Disc Drive: directional interchange
- Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway (existing alignment): directional interchange

Along the existing Pyramid Highway alignment south of Sparks Boulevard/Highland Ranch Parkway to Los Altos Parkway, Pyramid Highway would remain a four-lane arterial, but would be modified by installing a raised median island to limit left turns from driveways and cross streets. Driveways affected include those to the Blue Gem and Oasis Mobile Estates mobile home parks as well as the First Baptist Church. Access to Spring Ridge Drive would be changed to right-in/right-out. South of Los Altos Parkway, existing Pyramid Highway would be upgraded to a six-lane arterial to Disc Drive, again with limited left turn movements. The existing southerly access to the Wal-Mart and at Shoppers Square would remain with slight modifications made to connect to the arterial improvements.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 2  Arterial Alternative 1
Arterial Alternative 2

Arterial Alternative 2 shown on Figure 3 would be an alignment following the existing Pyramid Highway between the US 395 Connector and Sparks Boulevard/Highland Ranch Parkway. This alignment would include a six-lane, limited access, arterial cross-section on Pyramid Highway between Sparks Boulevard/Highland Ranch Parkway and Disc Drive. The US 395 Connector would consist of a four-lane arterial cross-section between Disc Drive and US 395 with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector alignment would cross Sun Valley south of Rampion Way and would include an interchange at Sun Valley Boulevard.

Arterial Alternative 2 would have three interchanges, in addition to those common to all alternatives, at the following locations:

- Los Altos Parkway: diamond interchange
- Disc Drive at Pyramid Highway: at-grade intersection with directional ramps to northbound and from southbound Pyramid Highway tying into the US 395 Connector. These directional ramps bypass traffic from the Disc Drive intersection.
- Sun Valley Boulevard: diamond interchange

Access changes to driveways and local streets along existing Pyramid Highway are required as a part of this alternative. The existing Spring Ridge Drive access to Pyramid Highway would be eliminated and two new accesses at the north and south ends of Dorchester Drive would be provided. Other access changes are required to accommodate the mobile home communities east of Pyramid Highway, and include providing a new access road along the frontage of Pyramid Highway to access the Oasis Mobile Estates mobile home park.

Farther south, the southerly access to the Wal-Mart shopping center and the access to Shoppers Square would be eliminated.

Some driveways along Sun Valley Boulevard would be modified to right-in/right-out only as a result of both the widening of Sun Valley Boulevard and the placement of raised median islands to accommodate the interchange improvements. Both West and East Leonesio Drives on the west side of Sun Valley would be cul-de-saced on both sides of the new US 395 Connector.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 3  Arterial Alternative 2
Arterial Alternative 3

Arterial Alternative 3 shown on Figure 4 would be an alignment along the ridgeline of the mountains between the US 395 Connector and Highland Ranch Parkway. The US 395 Connector would cross Sun Valley south of Rampion Way and include a diamond interchange immediately west of Sun Valley Boulevard at Raggio Parkway. The US 395 Connector would consist of a four-lane arterial cross-section with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector would cross Sun Valley south of Rampion Way and would include an interchange west of Sun Valley Boulevard.

Aside from the interchange west of Sun Valley Boulevard, this alignment would include two additional interchanges; a directional interchange at the extension of Disc Drive and a directional system interchange with Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway.

Improvements and access changes along existing Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway to Disc Drive would be the same as those described under Arterial Alternative 1. In Sun Valley, both West and East Leonesio Drives in Sun Valley would be terminated with cul-de-sacs on both sides of the new US 395 Connector.
Figure 4  Arterial Alternative 3

Note: See Figure 1 for elements common to all Arterial Alternatives.
Arterial Alternative 4

Arterial Alternative 4 shown on Figure 5 would be an alignment following the existing Pyramid Highway between Sparks Boulevard/Highland Ranch Parkway and the US 395 Connector; the same alignment as Arterial Alternative 2. This alignment would include a six-lane, limited access, arterial cross section located on Pyramid Highway between the Sparks Boulevard/Highland Ranch Parkway intersection and Disc Drive. The US 395 Connector would consist of a four-lane arterial cross-section between Disc Drive and US 395 with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector alignment would follow the more northern Rampion Way crossing of Sun Valley and would include an interchange immediately west of Sun Valley Boulevard at Raggio Parkway.

Like Arterial Alternative 2, this alternative includes three additional interchanges at Los Altos Parkway, Disc Drive, and west of Sun Valley Boulevard.

Access changes along Pyramid Highway are similar to Arterial Alternative 2. Access changes in Sun Valley are similar to those under Arterial Alternative 1, except that there would be no impacts to existing driveways because no widening along Sun Valley Boulevard would occur.
Figure 5   Arterial Alternative 4

Note: See Figure 1 for elements common to all Arterial Alternatives.
Attachment B – APE Maps: 1:24,000 Scale
May 18, 2017

Mr. C. Cliff Creger
Cultural Resources Program Manager
Environmental Services
Nevada Department of Transportation
1263 South Stewart Street
Carson City, NV 89712

Re: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada.
EA #73390 & 73391/NDOT # WA11-009/FHWA #DE-0191(065) & DE-019(067)
Undertaking 2010-0884

Dear Mr. Creger:

The Nevada State Historic Preservation Office (SHPO) has reviewed the subject documents received April 19, 2017 in accordance with the Programmatic Agreement Among the Federal Highway Administration, the Nevada Department of Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Implementation of Federal-Aid Transportation Projects in the State of Nevada (PA).

Area of Potential Effect (APE)

Direct APE:
While the SHPO is foreseeing concurring on the direct APE described and illustrated in the submitted documents, the SHPO seeks clarification on the following:
1. it is not clear if, or where, staging areas will be located in the direct APE,
2. it is not clear if the direct APE includes the 100 meter buffer mentioned in the March 28, 2017 meeting minutes, and
3. it is not clear what the total acreage of the established direct APE is at this time.

Upon receipt of this information this office will promptly resume its review.

Indirect APE:
It is not clear why the indirect APE has several “cutouts,” some of which are alongside or near areas where work will occur. The APE also has several areas in which it appears very narrow, versus other areas where it extends a considerable distance. In order to better understand why the APE is shaped in this manner, more information is needed about the location and type of each of the proposed new vertical elements. The SHPO suggests submitting a new set of maps, similar to those depicting the various arterial alternatives (Figures 1-5), that show exactly where light poles, retaining walls, elevated roadway segments, and other new vertical elements will be located. The maps could be color-coded to differentiate between elements of different heights. Ideally, those elements can be depicted on maps that also show the indirect APE so that our office can better understand the rationale behind the APE’s shape.

www.shpo.nv.gov
May 18, 2017

As the SHPO previously discussed with NDOT, the indirect APE should be based on topography and
viewshed and not on parcel boundaries.

We request a meeting with your architectural historian to discuss the above.

Should you have any questions concerning this correspondence, please contact Jessica Axsom at
(775) 684-3445 or by email at jaxsom@shpo.nv.gov or SHPO staff architectural historian Kristen Brown at
(775) 684-3439 or by email at knbrown@shpo.nv.gov.

Sincerely,

Robin K. Reed
Deputy State Historic Preservation Officer

22603
Legend
- Indirect APE
- Areas Added to Indirect APE
- Direct APE
- Historic District
- Prosser Valley Ditch

Figure 1

Spanish Springs

EAGLE CANYON DR

LA POSADA DR

DOLORES DR

Sierra Vista Ranch Historic District

CALLE DE LA PLATA

PYRAMID HWY

LAZY 5 PKWY
Table 1: Factors Used to Determine Indirect APE Boundary

The demarcation of the indirect APE varies in consideration of factors noted in this table. Photos of segment viewsheds are provided in Table 2. The rationale for “cutout” areas within the Indirect APE is discussed in the attached letter.

<table>
<thead>
<tr>
<th>Segment (based on improvement type – see Figure 2 for segment locations)</th>
<th>Type of Improvement</th>
<th>Context of Improvement</th>
<th>Viewshed</th>
<th>Viewshed from Improvement (approx. distance in feet)</th>
<th>Does adjacent parcel capture viewed?</th>
<th>Yes or no, explain.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Segment A: Along Pyramid Highway – starting north of Cale de la Plata and ending approximately 0.4 mile south of Lazy 5 Parkway</td>
<td>Resurfacing, road widening, street lighting for safety per NDOT standards, traffic signals at select intersections, bike/ped facilities, at-grade tie-in road improvements at certain intersecting roads.</td>
<td>Within existing Pyramid Highway corridor. On existing transportation alignment. Located within both built and undeveloped environments, including commercial, residential, and vacant land. Existing road is at-grade.</td>
<td>At-grade road improvements (limited to adjacent properties/parcels), and above-grade elements that include street lighting and traffic signals at certain intersections are visually indistinguishable at approx. 800 feet. Flat topography along road/valley floor. Line-of-Sight: Improvements viewed from majority of adjacent parcels; however, some adjacent parcel views of road are blocked by residential fencing and mature trees/vegetation. In more open undeveloped areas, road vertical elements are visually indistinguishable at approx. 800 feet. Vantage point: Adjacent areas are level to road; in some areas, topography is slightly downgradient of the highway to the east, making improvements less visible; and slightly upgradient to the west, making the improvements slightly more visible in those areas. The existing road is at-grade. Road is located in a relatively flat area, with some undulations to the west.</td>
<td>Adjacent parcels where development is adjacent to road. Approx. 800 feet in more open/flatter area.</td>
<td>Yes. Adjacent parcels capture the viewed boundary because the proposed vertical elements (street lights and traffic signals), with an unobstructed line-of-sight, are not visually distinguishable beyond approximately 800 feet. Adjacent parcels would be visible from a much shorter distance than 800 feet where the line-of-sight is obstructed by development or hillsides adjacent to the road.</td>
<td></td>
</tr>
<tr>
<td>Segment B: Along Pyramid Highway starting approx. 0.4 mile south of Lazy 5 Parkway and ending approx. 0.25 mile south of Kiley Parkway.</td>
<td>Change existing at-grade Pyramid Highway/Sparks Boulevard interchange to a grade-separated interchange, with Pyramid Highway crossing over Sparks Boulevard. Includes street lighting for safety per NDOT standards, traffic signals, road signage, bike/ped facilities along Pyramid Highway, and at-grade tie-in road improvements at Sparks Boulevard and Highland Ranch Parkway.</td>
<td>Within existing Pyramid Highway corridor. On existing transportation alignment. Located within both built and undeveloped environments. Existing road is at-grade. Existing vertical elements include power poles, road signage, street lighting, traffic signals, residential buildings, and mature trees/vegetation.</td>
<td>Above-grade overpasses and ramps associated with grade-separated Pyramid Highway/Sparks Boulevard interchange, and street lights, traffic signals, and road signage. At-grade tie-in road improvements at intersection roads.</td>
<td>In undeveloped areas, improvements would be visually indistinguishable from the east at approximately 800 feet. In developed areas east of the highway, the improvements would be visible from adjacent parcels. Views of improvements from the west are limited to undeveloped hillsides on west side of highway.</td>
<td>Yes. Adjacent parcels capture the viewed boundary because the proposed vertical elements are not visually distinguishable beyond approximately 800 feet. Vertical elements would be visible from a much shorter distance than 800 feet where the line-of-sight is obstructed by development or hillsides adjacent to the road.</td>
<td></td>
</tr>
<tr>
<td>Segment C: Along Pyramid Highway starting approximately 0.25 mile south of Kiley Parkway</td>
<td>Resurfacing, road widening, street lighting for safety per NDOT standards, traffic signals at select intersections, bike/ped facilities, at-grade tie-in road improvements at certain intersecting roads.</td>
<td>Within existing Pyramid Highway corridor. On existing transportation alignment. Located in both built and undeveloped environments, including commercial, residential, and vacant land. Existing road is at-grade.</td>
<td>At-grade road improvements (limited to adjacent properties/parcels), and above-grade elements that include street lighting and traffic signals at certain intersections are visually indistinguishable at approx. 800 feet. Relatively flat topography along road/valley floor; hillsides to the west.</td>
<td>Pyramid Highway is visible from the east from adjacent parcels. In some areas it is also visible from the next row of parcels (at distance of approx. 660 feet); those parcels are also included in the indirect APE in this segment. Improvements are.</td>
<td>Yes. Parcels included in the indirect APE in this segment capture the viewed boundary due to topography and/or developments.</td>
<td></td>
</tr>
<tr>
<td>Segment</td>
<td>Type of Improvement</td>
<td>Context of Improvement</td>
<td>Factors Considered to Determine APE Boundary</td>
<td>Viewshed from Improvement</td>
<td>Does adjacent parcel capture viewshed?</td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td>---------------------</td>
<td>------------------------</td>
<td>---------------------------------------------</td>
<td>---------------------------</td>
<td>-------------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>Segment D</strong></td>
<td><strong>Along Pyramid Highway where new US 395 Connector veers away from Los Altos Parkway</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Road widening (Pyramid Highway), overpass for new diamond interchange at Los Altos Parkway, street lighting for safety per NDOT standards, bike/ped facilities, at-grade tie-in road improvements at certain intersecting roads.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Within existing Pyramid Highway corridor.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>On existing transportation alignment.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Located in both built and undeveloped environments, including commercial, residential, and vacant land. Existing road is at-grade. This segment includes portion of US 395 connector where it begins to cross west from Pyramid Highway on new alignment and Disc Drive is extended west on new alignment at-grade to connect with US 395 connector.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Existing vertical elements include power poles, road signage, commercial buildings and signage, residential structures, masonry noise wall wall approx. 5 feet high, traffic signals, hills west of road.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Views of at-grade road improvements are limited to adjacent properties/parcels and above-grade elements are visually indistinguishable at approx. 800 feet from downgradient areas to the east.</strong></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Road is relatively flat. Areas west of the road are upgradient with hills, areas to the east are downgradient from the road.</strong></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Line-of-Sight: Improvements viewed from adjacent parcels. In more open undeveloped areas, improvements are visually indistinguishable at approx. 800 feet.</strong></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td><strong>Vantage point: Topography is slightly downgradient of the highway to the east and upgradient to the west. This generally makes improvements more visible from the west and comparatively less visible from the east. Above-grade improvements would be viewed from the east against either existing development or hillsides.</strong></td>
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<td><strong>Improvements would be visually indistinguishable beyond 800 feet.</strong></td>
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<td><strong>In areas of undeveloped hillsides to the west, distant views of the highway from the west are constrained.</strong></td>
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<tr>
<td><strong>From developed areas west of the highway, views of Pyramid Highway are limited to adjacent parcels.</strong></td>
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<tr>
<td><strong>In some areas in this segment, adjacent parcels as well as parcels next to those parcels were included in the indirect APE – this was done in case parcels adjacent to the road were acquired for the project.</strong></td>
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<tr>
<td><strong>Yes. Parcels included in the indirect APE in this segment capture the viewshed (in this segment, some areas of the indirect APE include both adjacent and next row of parcels, and several adjacent parcels are large and extend 600 to 800 feet from road), due to topography and/or developments.</strong></td>
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<tr>
<td><strong>Resurfacing, road widening, street lighting, bike/ped facilities, at-grade tie-in road improvements at major intersecting streets.</strong></td>
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<tr>
<td><strong>On existing transportation alignments located within both built and undeveloped environments.</strong></td>
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<tr>
<td><strong>Existing roads currently have vertical elements such as power poles and road signage. Some intersections have traffic signals while others have stop signs.</strong></td>
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<tr>
<td><strong>Along Pyramid Highway, other existing vertical elements include commercial buildings and signage, and hills to the west and east.</strong></td>
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<tr>
<td><strong>Along Disc Drive, existing vertical elements include commercial buildings, signage, commercial landscaping, residential buildings and landscaping, masonry wall approx. 5 feet high.</strong></td>
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<tr>
<td><strong>At-grade road improvements, and above-grade elements that include street lighting, bike/ped facilities and tie-in road improvements.</strong></td>
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<tr>
<td><strong>Along Pyramid: Located on valley floor and through rolling topography/hills farther south. Rolling hills variously located along east and west sides of road. Along Disc Drive: Located along relatively flat area.</strong></td>
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<tr>
<td><strong>Line-of-Sight: Pyramid Highway: View of improvements largely limited to adjacent parcels due to hilly topography and at-grade nature of improvements. Farther south, views of improvements are limited to adjacent parcels due to adjacent development. Disc Drive: View of improvements largely limited to adjacent parcels due to development adjacent to road. Views from some adjacent residential developments are blocked by landscaping and fencing.</strong></td>
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<tr>
<td><strong>Vantage point: Pyramid Highway: Adjacent upgradient areas near road would lack down on existing developed transportation corridor. Areas downgradient from road would look up to road, making improvements less visible from those areas. Disc Drive: Views from adjacent developments/parcels from commercial establishments and associated parking lots. In more open areas, views of the at-grade improvements are visually indistinguishable beyond approximately 400 feet.</strong></td>
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<tr>
<td><strong>Pyramid Highway: West of Pyramid Highway, undeveloped hills on both sides along most areas of the road in this segment constrain distant views. In developed areas, views of the highway are limited to adjacent parcels.</strong></td>
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<tr>
<td><strong>Disc Drive: In developed areas, Disc Drive is visible from adjacent parcels. In undeveloped areas, Disc Drive and its vertical elements become visually indistinguishable beyond approx. 400 feet.</strong></td>
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</tr>
<tr>
<td><strong>Yes. Parcels included in the indirect APE in this segment capture the viewshed due to topography and/or adjacent developments.</strong></td>
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</tr>
</tbody>
</table>
### Segment F: New road construction on new alignment, with both at-grade, below-grade, and elevated sections (including ramps and overpasses) depending on the arterial alternative alignment and topography they cross. Includes bike/ped facilities and street lighting for safety per NDOT standards.

- **Context of Improvement**: On new alignment within undeveloped environment.
  - Existing vertical elements include rolling undeveloped hills, power poles.
  - Topography: Slopes, hilly terrain.
  - Line-of-Sight: Improvements are visible from the south and east as they cross the undeveloped hillsides, but those views are intermittent and blocked in some areas due to the hilly terrain. Views of improvements from the northwest are blocked by trees.
  - Vantage point: The improvements would be viewed from a downstream location toward the improvements located on upgradient hills. The terrain slopes downhill to the east, making the hillsides and new proposed alignments visible from areas along Pyramid Highway and parcels east of Pyramid Highway. Due to the hilly terrain that the alternatives would cross, distance, and area development, areas where the improvements would be visually distinguishable vary. The proposed improvements would not be visually distinguishable from the eastern-most indirect APE boundary east of Pyramid Highway. Some parcels in this segment located between Pyramid Highway and proposed arterial alignments west of Pyramid (north of Los Altos Parkway) contain structures built in 1999 and later, and as such, are not included in the indirect APE.
  - **Viewed from Improvement**: Viewed from the east side of improvements.
    - Viewshed from the east side of improvements.
      - Viewshed from the viewshed of improvements: 650 ft, 1,650 ft, 3,000 ft, 3,910 ft.
  - **Viewed from Improvement**: Viewed from the west.
    - Viewshed from the west is constrained by undeveloped hilly areas.
  - **Viewed from Improvement**: Viewed from the south.
    - Viewshed from the south of improvements.
      - Viewshed from the south side of improvements: 185 to 300 ft.

### Segment G: in Sun Valley along the new US 395 Connector where it spans Sun Valley Boulevard.

- **Context of Improvement**: On new alignment within existing built environment. Segment crosses existing Sun Valley Boulevard transportation corridor.
  - Existing vertical elements include power poles, street lighting, commercial and residential structures, commercial and residential landscaping, traffic signals, hills.
  - Topography: Slightly sloping terrain adjacent to Sun Valley Boulevard with more pronounced slopes farther to the east and west sides of Sun Valley Boulevard.
  - Line-of-Sight: Above-grade improvements can be seen from residential and commercial areas north and south of proposed alignment. Views of above-grade improvements are intermittently blocked by hilly areas, multi-story apartment buildings, and mature residential vegetation scattered within adjacent neighborhoods. Alt-1 and 4 would be viewed from adjacent parcels due to area development. Line-of-Sight from certain residential parcels in this area would be shielded by adjacent developed parcels, mature vegetation, and topography such that they would not experience demonstrable impacts from the proposed improvements.
  - Vantage point: Above grade improvements (overpass, ramps) would be viewed from adjacent areas that are downstream from improvements. Alt-grade improvements would be visible from adjacent parcels.
  - **Viewshed from Improvement**: Viewsheds range between 185 to 300 feet.

### Segment H: Along Sun Valley Boulevard starting just south of 1st Avenue and ending just north of Crystal Lane.

- **Context of Improvement**: On existing Sun Valley Boulevard transportation corridor within existing built environment.
  - Existing vertical elements include power poles, street lighting, commercial and residential structures, commercial and residential landscaping, traffic signals, hills.
  - Topography: Slightly rolling/hilly.
  - Line of Sight: Viewed from adjacent properties/parcels.
  - Vantage point: Road is gently rolling, restricting longer distant views down the road. Nearby areas to the south are up slope, while areas to the immediate north are down slope, with taller undeveloped hills in the near distance blocking longer distant views. Views of improvements would be viewed from up slope areas to the west, and slightly down grade areas to the east.
  - **Viewed from Improvement**: Averages approximately 175 feet.

### Segment I: Along new US 395 Connector between Sun Valley Boulevard and US 395, where Raggio Parkway and Dandini Boulevard would be realigned. Ending at proposed interchange at US 395/Parr Boulevard/New Pyramid Highway.

- **Context of Improvement**: Realignment of two existing roads (Raggio Parkway and Dandini Boulevard) occurring at-grade and along existing and new alignments. Raggio Parkway would be extended on an existing alignment north to 2nd Avenue. At-grade lie-in road improvements at 1st and 2nd Avenue at extended Raggio Parkway. Overpass for crossing of extended Raggio Parkway and ramps. Grade-separated improvements to existing grade-separated Parr Boulevard. New US 395 interchange to accommodate addition of new US 395 Connector – includes overpass and grade crossings.
  - Existing vertical elements include power poles.
  - Topography: Hilly.
  - Line of Sight: Intermittent due to hilly terrain. Some areas’ line of sight is limited to adjacent parcels. Longer distant views are possible to the south and east, but distance and topography would make improvements minimally noticeable.
  - Vantage point: From the DRI and TMCC campuses adjacent to roadways. From adjacent parcels on eastern side of this segment, depending on terrain.
  - **Viewed from Improvement**: Varies greatly due to hilly terrain. Sometimes viewed limited adjacent to road, other areas 200 feet. Farther distance views exist to the east/downslope but due to distance, improvements would not have visual impacts beyond approx. 0.5 mile.

---

### Factors Considered to Determine APE Boundary

- **Does adjacent parcel capture viewshed?**
  - Yes. For the parcels included in the indirect APE in this segment the capture viewed (due to 1) the large size of the parcels and (2) the viewshed of parcels included in the indirect APE in this area; (3) hilly terrain that blocks views of the improvements from varying areas, and (4) viewer distance from improvements, making the views visually indistinguishable or no impactful (range depends on topography – see discussion under “Viewshed” column).
  - Note that some parcels potentially within viewshed are not included in the Indirect APE because they are not of sufficient age to be evaluated for NRHP eligibility (they were built in 1989 or later).
<table>
<thead>
<tr>
<th>Segment</th>
<th>Type of Improvement</th>
<th>Context of Improvement</th>
<th>Factors Considered to Determine APE Boundary</th>
<th>Viewshed</th>
<th>Viewshed from Improvement</th>
<th>Does adjacent parcel capture viewshed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 395 Connector.</td>
<td></td>
<td>poles, street lights, road signage, traffic signals, educational institution buildings, commercial buildings and landscaping, and hills.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Segment J: Along US 395 extending approx. 0.5 mile north of, and approx. 0.9 mile south of existing Parr Boulevard.</td>
<td>• Road widening (adding auxiliary lanes along US 395).</td>
<td>• On existing transportation alignment within both developed and undeveloped environment. • Existing vertical elements include power poles, guardrails, and adjacent hills.</td>
<td>• At-grade road improvements (limited to adjacent properties/parcels). • Road is relatively flat as it cuts through hilly area. • Line-of-Sight: View of improvements is limited to adjacent parcels due to topography. In fact, several adjacent parcels do not have line of sight/views of the road due to their location upgradient from the road. Although the at-grade elevation on which the road is located rises gradually in this area as one travels north, potentially making the improvements viewable from greater distances, the adjacent hills block most longer-distance views of the improvements. Any longer distant views provided would be at such a distance as to render the improvements visually indistinguishable. • Vantage point: Adjacent parcels are upgradient on both sides of road due to topography and would look down toward the road.</td>
<td></td>
<td></td>
<td>• Yes because of the hilly topography through which the road currently travels, views of the road are limited to adjacent parcels.</td>
</tr>
</tbody>
</table>
### Table 2: Viewshed Photos, by Segment

See Figure 2 for segment locations.

<table>
<thead>
<tr>
<th>Segment A: Along Pyramid Highway - starting north of Calle de la Plata and ending approximately 0.4 mile south of Lazy 5 Parkway.</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Segment</strong></td>
<td><strong>Viewshed Photo</strong></td>
</tr>
<tr>
<td></td>
<td>Below is view looking south along Pyramid Highway at Egyptian Drive.</td>
</tr>
<tr>
<td></td>
<td>Below is view looking south along Pyramid Highway at La Posada Drive/ Eagle Canyon Drive.</td>
</tr>
<tr>
<td></td>
<td>Below is view looking west toward Pyramid Highway from La Posada Drive approximately 650 feet east of the highway. While Pyramid Highway and its vertical elements are visible to parcels adjacent to the highway in this area, the highway and its vertical elements are visually indistinguishable from the surrounding built environment at this distance.</td>
</tr>
<tr>
<td></td>
<td>Below is view looking south along Pyramid Highway north of Lazy 5 Parkway.</td>
</tr>
</tbody>
</table>
### Segment A (Continued)

<table>
<thead>
<tr>
<th>Segment</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Below is view looking south along Pyramid Highway at Lazy 5 Parkway.</td>
<td></td>
</tr>
</tbody>
</table>

Below is view looking west toward Pyramid Highway from the Lazy 5 Parkway/David Allen Parkway intersection located approximately 1,170 feet east of Pyramid Highway. As seen, Pyramid Highway and its existing vertical elements (street lights, signage) are visually indistinguishable in this view.
Segment B: Along Pyramid Highway starting approx. 0.4 mile south of Lazy 5 Parkway and ending approx. 0.25 mile south of Kiley Parkway.

Below is view looking south along Pyramid Highway with Sparks Boulevard intersection seen in the middle of photo.

Below is view looking west toward Pyramid Highway from Sparks Boulevard approx. 800 feet east of the Highway. As seen, Pyramid Highway and its existing vertical elements (street lights, signage) are visually indistinguishable in this view.

Below is view looking south along Pyramid Highway at Kiley Parkway.

Below is view looking north along Pyramid Highway at Kiley Parkway.
<table>
<thead>
<tr>
<th>Segment</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Segment C</strong>: Along Pyramid Highway starting approximately 0.25 mile south of Kiley Parkway and ending approximately 0.30 mile north of Los Altos Parkway.</td>
<td><img src="image-url" alt="Viewshed Photo" /></td>
</tr>
</tbody>
</table>

Below is view looking south along Pyramid Highway at Golden View Drive:

![Viewshed Photo](image-url)

Below is view looking south along Pyramid Highway south of Golden View Drive:

![Viewshed Photo](image-url)

Source of all photos: Google Streetview
| Segment D:  
| Along Pyramid Highway  
<table>
<thead>
<tr>
<th>where new US 395 Connector veers away from Pyramid Highway under Arterial Alternatives 2 and 4.</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Below is view looking south along Pyramid Highway at Los Altos Parkway:</td>
<td><img src="image1" alt="View from south" /></td>
</tr>
<tr>
<td>Below is view looking north along Pyramid Highway at Disc Drive:</td>
<td><img src="image2" alt="View from north" /></td>
</tr>
<tr>
<td>Below is view looking west toward Pyramid Highway from Disc Drive approx. 450 east of the Highway.</td>
<td><img src="image3" alt="View from west" /></td>
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<tr>
<td>Segment</td>
<td>Viewshed Photo</td>
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<tr>
<td>Segment E: Along Pyramid Highway from Disc Drive south to Queen Way, and along Disc Drive from Pyramid Highway east to just east of Vista Boulevard. These two roads are included in this segment because of similar improvements proposed for both in this area.</td>
<td><img src="image1" alt="View looking south along Pyramid Highway south of Disc Drive." /></td>
</tr>
<tr>
<td>Below is view looking south along Pyramid Highway south of Disc Drive.</td>
<td><img src="image2" alt="View looking north along Pyramid Highway at Queen Way." /></td>
</tr>
<tr>
<td>Below is view looking north along Pyramid Highway at Queen Way.</td>
<td><img src="image3" alt="View looking west along Disc Drive at Vista Boulevard." /></td>
</tr>
<tr>
<td>Below is view looking west along Disc Drive at Vista Boulevard.</td>
<td><img src="image4" alt="View looking west along Disc Drive at Sparks Boulevard." /></td>
</tr>
<tr>
<td>Below is view looking west along Disc Drive at Sparks Boulevard.</td>
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<tr>
<td>Segment</td>
<td>Viewshed Photo</td>
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<tr>
<td>------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Segment E</strong> (Continued)</td>
<td>Below is view looking north along Sparks Boulevard toward Disc Drive at a distance of approx.. 400 feet; Disc Drive and its vertical elements (street lights) become visually indistinguishable beyond this point.</td>
</tr>
<tr>
<td><strong>Segment F</strong></td>
<td>Below is view looking northwest from Pyramid Highway toward area of the new US 395 Connector alignments.</td>
</tr>
<tr>
<td></td>
<td>Below is view looking northwest from High Rock Way in residential development south of the connector alignments -- hills block views of improvements from this location.</td>
</tr>
</tbody>
</table>
Segment G: In Sun Valley along the new US 395 Connector where it spans Sun Valley Boulevard.

Below is view along Leon Drive looking south toward the US 395 Connector crossing. The northern US 395 Connector would be approximately 880 feet from this viewpoint; the southern crossing would be approximately 1,760 feet from this viewpoint.

Segment H: Along Sun Valley Boulevard starting just south of 1st Avenue and ending just north of Crystal Lane.

Below is view looking north along Sun Valley Boulevard at El Rancho Drive/Dandini Blvd. Topography to the east and west is somewhat hilly, limiting distant views.

Below is view looking south along Sun Valley Boulevard at 1st Avenue:
<table>
<thead>
<tr>
<th>Segment</th>
<th>Viewshed Photo</th>
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<tbody>
<tr>
<td>Segment H (continued)</td>
<td>Below are two visual simulations for two viewpoints prepared for the Final Environmental Impact Statement as part of the overall visual impact assessment conducted for the undertaking. The two viewpoints below are located along Sun Valley Boulevard to illustrate how the north and south US 395 connector crossings of Sun Valley may appear from Sun Valley Boulevard. Both viewpoints are looking north along Sun Valley Boulevard.</td>
</tr>
<tr>
<td>Viewpoint 1: View of US 395 connector northern crossing of Sun Valley Boulevard (from a point approximately 360 feet south of northern crossing):</td>
<td><strong>Before:</strong></td>
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<tr>
<td></td>
<td><img src="image1" alt="Before" /></td>
</tr>
<tr>
<td></td>
<td><strong>After:</strong></td>
</tr>
<tr>
<td></td>
<td><img src="image2" alt="After" /></td>
</tr>
<tr>
<td>Segment</td>
<td>Viewshed Photo</td>
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</tr>
<tr>
<td><strong>Segment H (Continued)</strong></td>
<td><strong>Viewpoint 2:</strong> View of US 395 Connector southern crossing of Sun Valley Boulevard (from a point approximately 1,470 feet south of the proposed southern crossing):</td>
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<td><strong>Before:</strong></td>
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</table>

![Before image]

<table>
<thead>
<tr>
<th></th>
<th><strong>After:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>![After image]</td>
</tr>
<tr>
<td>Segment</td>
<td>Viewshed Photo</td>
</tr>
<tr>
<td>---------</td>
<td>---------------</td>
</tr>
<tr>
<td><strong>Segment I</strong></td>
<td>Along the new US 395 Connector between Sun Valley Boulevard and US 395, where Raggio Parkway and Dandini Boulevard would be realigned. Ending at improved interchange at US 395/Parr Boulevard/New US 395 Connector.</td>
</tr>
</tbody>
</table>

Below is view looking west along Dandini Boulevard at Truckee Meadows Community College:

Below is view looking west along Dandini Boulevard just east of US 395.

Below is view looking south along Raggio Parkway, south of Disc Drive:

Below is view looking west from Raggio Parkway toward the US 395/Parr Boulevard existing interchange (existing US 395 is below-grade/not visible from this viewpoint).
<table>
<thead>
<tr>
<th>Segment</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Segment I (Continued)</td>
<td>Below is view looking east from Parr Boulevard toward existing US 395/Parr Boulevard; this interchange would be reconfigured to accommodate new US 395 connection; interchange is approx. 600 feet away in this view;</td>
</tr>
<tr>
<td></td>
<td>Below view is looking northwest along existing US 395 approx. 2,300 ft. south of current US 395/Parr Boulevard interchange – interchange area is not visually distinguishable beyond this point to the south.</td>
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<tr>
<td></td>
<td>Below is view looking southeast along existing US 395 approx. 1,230 ft. north of existing US 395/Parr Boulevard interchange – interchange area is not visually distinguishable beyond this point farther north.</td>
</tr>
<tr>
<td>Segment</td>
<td>Viewshed Photo</td>
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<td>----------------</td>
</tr>
<tr>
<td>Segment J</td>
<td>Along US 395 extending approx. 0.5 mile north of, and approx. 0.9 mile south of existing Parr Boulevard. Below is view looking north along US 395 from approximately 2,200 feet south of the existing Parr Boulevard Interchange.</td>
</tr>
</tbody>
</table>

Source of all photos: Google Streetview
October 19, 2017

MS. RACHEL CREWS
ARCHAEOLOGIST
BUREAU OF LAND MANAGEMENT
5665 MORGEN MILL ROAD
CARSON CITY NEVADA 89701

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Determinations of Eligibility and Effects for Historic Architecture and Archaeological
Resources and Section 4(f) De Minimis Notification
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Crews:

The Federal Highway Administration (FHWA) and Nevada Department of Transportation (NDOT) are
requesting your review and comment on the determination of eligibility and effects as detailed in the
attached letter to the State Historic Preservation Officer, per the 2014 Federal-Aid Transportation
Programmatic Agreement (PA)1 (V.F.).

Please let me know if you have any questions.

Sincerely,

C. Cliff Creger
Chief Cultural Resources Program Manager

Enclosures:

October 19, 2017 letter to the State Historic Preservation Officer, and its attachments

cc: Abdelmoez Abdalla, FHWA
Jacob Waclaw, FHWA
Dale Wegner, FHWA
Greg Novak, FHWA
Pyramid Lake Paiute Tribe
Reno-Sparks Indian Colony

---

1 Programmatic Agreement Among the Federal Highway Administration, The Nevada Department of
Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation
Washoe Tribe of Nevada and California
Rebecca Palmer, SHPO
Doug Maloy, RTC
Jim Clarke, Jacobs
October 19, 2017

MS. REBECCA PALMER
STATE HISTORIC PRESERVATION OFFICER
NEVADA STATE HISTORIC PRESERVATION OFFICE
901 S. STEWART STREET SUITE 5004
CARSON CITY NEVADA 89701 4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Determinations of Eligibility and Effects for Historic Architecture and Archaeological
Resources and Section 4(f) De Minimis Notification
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

We have received your September 6, 2017 letter wherein you provided concurrence with the Direct Area
of Potential Effects (APE) established for the above-referenced undertaking, requested changes to the
Indirect APE, and posed other questions and requests for clarification. Thank you for your concurrence
with the Direct APE.

As discussed in the March 28, 2017 meeting amongst the State Historic Preservation Office (SHPO),
Federal Highway Administration (FHWA), Nevada Department of Transportation (NDOT), and the
Regional Transportation Commission (RTC), and to respond to your September 6, 2017 letter, the
purposes of this letter are as follows:

A. Address requests and questions posed in your September 6, 2017 letter.
B. Summarize the historic architecture and archaeological surveys conducted for this undertaking.
C. Consultations
D. Evaluate areas recently added to the APEs for presence of cultural resources (see our August 8,
2017 letter to your office for additional information).
E. Summarize previous National Register of Historic Places (NRHP) eligibility determinations for
historic architecture resources and present updated effect recommendations for NRHP-eligible
historic architecture resources.
F. Summarize previous NRHP eligibility recommendations for archaeological resources and
reiterate effect recommendations for NRHP-eligible archaeological resources.
G. Summarize effect recommendations for historic architecture and archaeological resources.
H. Notify your office of the Section 4(f) approach for the undertaking.
I. Request your concurrence on the Indirect APE and eligibility and effect recommendations, and
your acknowledgement of Section 4(f) approach.

Information previously provided to your office that differs from that provided in this letter is superseded
by this letter. FHWA, NDOT, and RTC are currently preparing the Final Environmental Impact

October 19, 2017

MS. REBECCA PALMER
STATE HISTORIC PRESERVATION OFFICER
NEVADA STATE HISTORIC PRESERVATION OFFICE
901 S. STEWART STREET SUITE 5004
CARSON CITY NEVADA 89701 4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Determinations of Eligibility and Effects for Historic Architecture and Archaeological Resources and Section 4(f) De Minimis Notification
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067); SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

We have received your September 6, 2017 letter wherein you provided concurrence with the Direct Area of Potential Effects (APE) established for the above-referenced undertaking, requested changes to the Indirect APE, and posed other questions and requests for clarification. Thank you for your concurrence with the Direct APE.

As discussed in the March 28, 2017 meeting amongst the State Historic Preservation Office (SHPO), Federal Highway Administration (FHWA), Nevada Department of Transportation (NDOT), and the Regional Transportation Commission (RTC), and to respond to your September 6, 2017 letter, the purposes of this letter are as follows:

A. Address requests and questions posed in your September 6, 2017 letter.
B. Summarize the historic architecture and archaeological surveys conducted for this undertaking.
C. Consultations
D. Evaluate areas recently added to the APEs for presence of cultural resources (see our August 8, 2017 letter to your office for additional information).
E. Summarize previous National Register of Historic Places (NRHP) eligibility determinations for historic architecture resources and present updated effect recommendations for NRHP-eligible historic architecture resources.
F. Summarize previous NRHP eligibility recommendations for archaeological resources and reiterate effect recommendations for NRHP-eligible archaeological resources.
G. Summarize effect recommendations for historic architecture and archaeological resources.
H. Notify your office of the Section 4(f) approach for the undertaking.
I. Request your concurrence on the Indirect APE and eligibility and effect recommendations, and your acknowledgement of Section 4(f) approach.

Information previously provided to your office that differs from that provided in this letter is superseded by this letter. FHWA, NDOT, and RTC are currently preparing the Final Environmental Impact
Statement (Final EIS) for this undertaking, in which Arterial Alternative 3 has been identified as the Preferred Alternative. Please refer to our April 19, 2017 letter to your office for a complete description of Arterial Alternative 3 (Preferred Alternative).

A. Address requests and questions posed in your September 6, 2017 letter.

Requests and questions in your September 6, 2017 are enumerated below, with responses provided under each.

1. Modify Indirect APE to clearly include gaps between the Direct and Indirect APE in Segments A, E, and J shown on Figure 3 (attachment to August 8, 2017 letter to SHPO): **Response:** The Indirect APE has been modified as requested. The Direct APE and modified Indirect APE are shown on Figure 1 attached. (Note that the Figure 3 attached to our August 8, 2017 letter showed the Indirect APE and the Arterial Alternative elements – and not the Direct APE).

2. Regarding areas newly added to the Indirect APE (depicted as light yellow on Figures 1 and 3), the SHPO looks forward to receiving more information for review for both archaeology and architectural resources. **Response:** This information is provided in Section D Evaluation of areas recently added to Indirect APE, of this letter.

3. The SHPO is still missing the *File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada*. It is our understanding that it contains the following information necessary for our review (1) a detailed literature search from NVCRIS, the Nevada State Museum, the Bureau of Land Management-Carson City office, historic records and historic maps and (2) details on consultation regarding the Nationally Designated Trail corridors within the APE. **Response:** This report (May 17, 2012) is attached and includes requested information. Note that the report titled, *A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada* (Revised April 28, 2015) is also attached, which documents the cultural resources inventory conducted for the Preferred Alternative (Arterial Alternative 3).

4. We request that NDOT confirm that the Direct APE illustrated in Figure 1 has been completely surveyed for archaeological resources for this undertaking and all information has already been included in the general report and site forms. **Response:** The Direct APE has been completely surveyed for archaeological resources. Two archaeological surveys were conducted for this undertaking. First, a survey of the four-proposed project alternative footprints was conducted early in the study process (2010/2011) to preliminarily identify sites and isolates within those footprints for planning purposes. Those footprints cover the Direct APE area. The survey involved an archaeological file and literature search and walkover pedestrian survey. The file search area included the proposed project alternatives and lands at least a mile around them. Parcels within the alternative footprints were inventoried where site access was authorized. Please refer to the attached *File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada* (March 5, 2012; Revised May 17, 2012) for more details about survey methodology, maps showing the project area, and survey results.

Later, an intensive Class III cultural resource survey was conducted only for the identified Preferred Alternative (Arterial Alternative 3). As described in the attached *A Class III Cultural Resources Inventory or the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada* (WCRM, 2015), the area surveyed for archaeological resources included the construction footprint of the Preferred Alternative plus a 100-foot-wide buffer on either side of the
construction footprint to encompass direct effects from ground-disturbing activities and any applicable indirect effects. The Preferred Alternative construction footprint is shown on Figure 1 of the Class III Cultural Resources Inventory report. The archaeological survey area included a 100-foot-wide buffer on either side of that footprint. As such, the area surveyed for archaeological resources encompasses the Arterial Alternative 3 (Preferred Alternative) portion of the Direct APE. Please refer to our April 19, 2017 letter to your office for a description of, and maps showing the alignment of, Arterial Alternative 3 (Preferred Alternative). The Direct APE and modified Indirect APE are shown on USGS topo map on Figure 1 attached.

5. Please note that our office has not yet received a copy of the Peterson and Stoner 2003 report A Class III Cultural Resources Inventory for the Kiley Ranch Project, Spanish Springs Valley, Washoe County, Nevada that we requested in our August 31, 2012 letter. **Response:** We apologize for not responding to this request previously. The referenced report was one of several previous reports that documented historic architecture resources. In response to your request, we contacted the authors of the report. They noted that it was prepared for a private client for another project, did not undergo agency review, was never used for Section 106 consultation, and the report remains in draft form. As such, the report is considered proprietary information, and any use of it would need to be approved by the client (developer), which would be problematic because the development corporation involved no longer exists. As such, NDOT is unable to provide a copy of that report to your office. Note that the surveys, survey results, and eligibility and effect recommendations made for the Pyramid/US 395 project were based on the surveys and reconnaissance that were conducted for the Pyramid/US 395 project, and not on information contained in that 2003 draft report.

6. We request that the maximum height for new vertical crossings and other new vertical structures (light poles, retaining walls, etc.) be clearly described in the discussion of effects for each historic resource. **Response:** This design information is included under discussion of effects for historic resources recommended eligible for the NRHP under Criteria A and C and that potentially would experience indirect/visual effects from the undertaking (the Sierra Vista Ranch and Troisi Family/Kiley Ranch historic districts). This information is not provided in effects discussions for the Irrtocabal Farm Historic District because it would not experience indirect effects due to its considerable distance from proposed improvements. This information also is not included in effects discussions for the Orr Ditch, Prosser Valley Ditch, or the three NRHP-eligible archaeological resources potentially impacted by Arterial Alternative 3 (Preferred Alternative) because those resources either have no integrity in the area of proposed improvements (Orr Ditch), their NRHP eligibility is based on characteristics of association rather than setting (Prosser Valley Ditch), or they are archaeological sites that are NRHP eligible under criterion D. Refer to discussion of effects later in this letter.

7. Please advise if the two visual simulations (Viewpoint 1 and Viewpoint 2) illustrated in Table 2, Segment H, are typical of other crossings for this project especially in the viewshed of identified historic resources. Does Viewpoint 1 illustrate the tallest crossing for this undertaking? Does Viewpoint 2 illustrate the design and height of most typical crossings for this undertaking? **Response:** Viewpoints 1 and 2 are visual simulations of the two US 395 Connector options for crossing Sun Valley Boulevard, with Viewpoint 1 showing the northern crossing (under Arterial Alternatives 1 and 4), and Viewpoint 2 showing the southern crossing (under Arterial Alternatives 2 and 3 [Arterial Alternative 3 is the Preferred Alternative]). These viewpoints are shown on attached Table A. The two US 395 Connector crossings of Sun Valley Boulevard are not typical of other interchanges proposed for this project. The topography of the valley and design constraints dictate the elevation of both crossing options. As it crosses Sun Valley Boulevard, the US 395 Connector bridge is about 50 feet above the existing road for the southern
crossing, and about 35 feet above the road for the northern crossing. (By comparison, the bridge surface for the Pyramid Highway/Sparks Boulevard grade-separated interchange would be a maximum height of approximately 25 feet above Sparks Boulevard.) The height and length of either of the US 395 Connector crossing structures tend to be more like a viaduct rather than a typical highway overpass. For the southern crossing option, the connector roadway is located in a cut on either side of Sun Valley Boulevard, meaning that the new road cuts into the hills located east and west of Sun Valley Boulevard. As such, the hills are higher than the proposed elevation of the new US 395 Connector crossing, which helps limit the visual impacts of the new crossing in the immediate area under Arterial Alternatives 2 and 3. Under Arterial Alternatives 3 and 4, the US 395 Connector bridge would likely have street lighting (approximately 32 feet tall) because of the ramps associated with the West of Sun Valley interchange proposed under those two alternatives. No street lights are anticipated on the US 395 Connector bridge under Arterial Alternatives 1 and 2 because the ramp connections would be located farther east and west than Arterial Alternatives 3 and 4. Either US 395 Connector bridge over Sun Valley Boulevard would be lined with a 42-inch tall solid concrete railing in accordance with NDOT standards. Other proposed interchanges vary depending on the arterial alternative (see description of undertaking attached to our April 19, 2017 letter to your office for details), but the Pyramid Highway/Sparks Boulevard grade-separated interchange is the only proposed interchange with the potential to affect the NRHP-eligibility of a historic architecture resource because it is located in the viewshed of the Trosi Family/Kiley Ranch Historic District (how this interchange would not affect this resource is discussed in Section E in this letter).

8. We request that the photos in Table 2 be keyed to a map to clarify the record. **Response:** The referenced photos were numbered (see attached Table A) and their locations were added to Figure 3 attached.

B. Summary of Historic Architecture and Archaeological Surveys Conducted

For historic architecture resources, Western Cultural Resource Management (WCRM), Inc., on behalf of FHWA, evaluated historic architecture resources within the Direct and Indirect APEs in 2011. The evaluation involved archival research and field survey. The methodology and survey results are documented in the *Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada* (January 2012, Revised December 2012) (Architectural Inventory Report), which has been previously provided to your office, and summarized in previous Section 106 correspondence.

For archaeological resources, WCRM conducted a file and literature search, as well as a preliminary field survey in 2011 to identify potential archaeological resources within or near the footprints of the four build alternatives under consideration. The survey involved review of background information regarding previous studies in and near the project area as well as a walkover pedestrian survey of the build alternative footprints. This information was used for planning purposes as the study moved forward. The methodology and survey results are documented in the *File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada* (WCRM, March 5, 2012; Revised May 17, 2012), which has been previously provided to your office and included as an attachment.

As noted in our April 19, 2017 letter to your office, the alternative designs evaluated in the 2013 Draft EIS were modified starting in 2014, in response to an updated traffic analysis that resulted in reduced traffic forecasts. The modified build alternatives, referred to as Arterial Alternatives, follow the same alignments as the original Draft EIS alternatives, but the modified designs resulted in an overall downsizing of the project footprint, including the elimination of some previously proposed grade-separated
interchanges and frontage roads along Pyramid Highway. In 2015, when Revised Alternative 3 (which is now referred to as Arterial Alternative 3) was identified as the Preferred Alternative, WCRM conducted a Class III intensive pedestrian archeological inventory of the Preferred Alternative in late 2014/early 2015. The survey area included the Preferred Alternative footprint plus a 100-foot-wide buffer on each side. Refer to our September 9, 2015 letter to your office for additional information. The methodology and survey results are documented in the *A Class III Cultural Resources Inventory or the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada* (WCRM, 2015), which was previously provided to your office and included as an attachment here.

C. Consultations

**Summary of National Park Service Congressional Trail Consultation**

NDOT consulted with the National Park Service (NPS) regarding the presence and location of Congressional Trails within the APE. The NPS maintains a National Historic Trails database that includes all Congressional Trail route designations. According to NPS data obtained in August 2012, portions of the California National Historic Trail (a Congressional Trail) are present within the Study Area, and trail segments are located near US 395. The trail corridor location provided by NPS was compared to the project footprint, and a site survey was conducted on August 15, 2012. Based on examination of the maps and walkover survey, no portions of the California National Historic Trail route are located within the project footprint (Direct APE). Due to confidentiality agreements with the NPS, the exact trail location is not disclosed in this letter.

In a May 19, 2017 email, NDOT provided a map of the project area boundary to the NPS and asked the NPS to comment on this undertaking, which may be in proximity of the California National Historic Trail. In a July 5, 2017 email response to NDOT, the NPS indicated that, as currently proposed, they have no concerns with the proposed undertaking as it pertains to the California National Historic Trail. Referenced emails are attached to this letter.

**Native American Consultation**

FHWA initiated formal government-to-government consultation with the Washoe Tribe of Nevada and California, the Reno-Sparks Indian Colony, and the Pyramid Lake Paiute Tribe through a letter to the tribes dated February 5, 2009 and continued consultation through March 7, 2017. Based on these consultations, the FHWA has determined that there are Native American concerns regarding NHPA issues surrounding this project as proposed. Tribal concerns about the eligibility of sites have been noted and tribal requests to avoid three sites were considered and evaluated. However, FHWA and NDOT determined that the project could only avoid one of the three sites. A copy of the Native American Consultation report is attached.

**Consultation with Interested Parties**

FHWA invited agencies, municipalities, tribal governments, and area organizations to serve as historic consulting parties for this undertaking. The SHPO, Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California are serving as Section 106 consulting parties for this project.

D. Evaluation of areas recently added to Indirect APE

As noted in our August 8, 2017 letter, additional areas were added to the Indirect APE following discussion with your office and to be consistent with the methodology discussed in that letter. Portions of parcels experiencing direct impacts were included in previous surveys conducted for this undertaking and discussed in prior consultation. Therefore, our attention focused on determining whether there was
potential for any historic architectural resources in these additional areas that may experience indirect
effects from the project. Table 1 provides a more detailed list of, and details about, the additional areas
and is organized by parcel or parcel grouping that correlates to a Map Identification Reference Number on
Figure 1.

The following resources were used to identify potential historic architecture within these additional areas
and assist in determining the need for additional field survey:

- Project plans to identify design elements and limits of disturbance
- APE map provided to SHPO with new areas identified (Figure 1)
- Washoe County Assessor Data (http://wcgisweb.washoecounty.us/QuickMap/)
  - Parcel Search
  - Real Property Assessment Data (including Year Built data)
  - Improvement Details
- USGS Historical Maps
  - 1891 (Nevada Reno Sheet, 1:125,000 scale)
  - 1950 (Reno Quadrangle, Nevada-Washoe Co., 1:62,500 scale)
  - 1951 (Reno Quadrangle, Nevada-Washoe Co., 1:62,500 scale)
  - 1957 (Reno, Nevada; California, 1:250,000 scale)
  - 1959 (Reno, Nevada; California, 1:250,000 scale)
  - 1960 (Reno, Nevada; California, 1:250,000 scale)
  - 1967 (Reno Quadrangle, Nevada-Washoe Co., 1:24,000 scale)
  - 1974 (Reno Quadrangle, Nevada, 1:24,000 scale)
  - 1980 (Reno, Nevada; California, 1:100,000 scale)
  - 1982 (Reno Quadrangle, Nevada, 1:24,000 scale)
  TabIndex=0&searchByTypeIndex=1)
  - Original surveys dated 6/30/1872 and 10/2/1865.
- Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (WCRM 2012)
- Aerial imagery (Imagery@2017 Google and Map data@2017 Google)
- Street View Imagery (Image capture: 2015 @2017 Google)

Following a review of the reference material noted above, none of these additional areas has the potential
for historic architecture because either there is no physical or documentary evidence of any structures or
built environment within the property, the existing structures on the property are not of sufficient age to
be considered for NRHP eligibility (the earliest construction date is 1976), or the area has been heavily
disturbed from construction of existing roadways. Therefore, there is no potential for historic architecture
on these parcels and there is no need for additional field survey.
<table>
<thead>
<tr>
<th>Map ID Reference Number</th>
<th>APN #</th>
<th>General Location</th>
<th>Address, City, County, Zip Code</th>
<th>Ownership</th>
<th>Evaluation Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>53409107</td>
<td>East of Pyramid Highway south of La Posada Drive</td>
<td>La Posada Drive, Washoe County, 89520</td>
<td>Washoe County</td>
<td>No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>2</td>
<td>08918191</td>
<td>Northwest quadrant of Pyramid Highway / Robert Banks Boulevard intersection</td>
<td>Pyramid Way, Washoe County, 89436</td>
<td>Owners of Desert Springs 1</td>
<td>No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>3</td>
<td>8373003</td>
<td>West of Pyramid Highway near Kiley Parkway intersection</td>
<td>Pyramid Way, Washoe County, 89436</td>
<td>Talbot LLC</td>
<td>No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>4</td>
<td>8386109, 8386110, 8386111, 8386112</td>
<td>Four adjacent parcels located within residential development in southeast quadrant of Pyramid Highway/Kiley Parkway intersection</td>
<td>Pah Rah Drive, Washoe County, 89436</td>
<td>Private homeowners</td>
<td>These parcels contain contemporary single-family residences built from 1994 through 1996. No potential for historic architecture on parcels and no need for field survey.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Note: These parcels were added to the Direct APE because they would be directly impacted from a water detention basin added to the design. The Direct and Indirect APE are one in the same at this location because of the type of improvement (at-grade). The Direct APE is shown on Figure 1.</td>
</tr>
<tr>
<td>5</td>
<td>51003129, 51003130, 51003131</td>
<td>Parcels located at residential cul-de-sac on Dorchester Drive</td>
<td>6885, 6881, and 6873 Dorchester Drive, Washoe County, 89436</td>
<td>Pyramid Cove LLC</td>
<td>No standing structures or built environment on parcels. No potential for historic architecture on parcels and no need for field survey.</td>
</tr>
<tr>
<td>Map ID Reference Number</td>
<td>APN #</td>
<td>General Location</td>
<td>Address, City, County, Zip Code</td>
<td>Ownership</td>
<td>Evaluation Results</td>
</tr>
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<tr>
<td>6</td>
<td>51049218, 51049231, 51049232</td>
<td>Adjacent parcels located within northeast quadrant of the Pyramid Highway/Los Altos Parkway intersection</td>
<td>232, 283, and 252 Los Altos Parkway, Sparks, NV 89436</td>
<td>51049218: HNM Properties Inc. 51049231: O’Reilly Auto 51049232: HNM Properties Inc.</td>
<td>These parcels are located within commercial development and are fully developed with buildings and parking lots built between 2007 and 2012. No potential for historic architecture on parcels and no need for field survey.</td>
</tr>
<tr>
<td>7</td>
<td>51038103, 51038104</td>
<td>Adjacent parcels located west of Pyramid Highway near Los Altos Parkway intersection</td>
<td>5005 and 5015 Pyramid Way, Sparks, NV 89436</td>
<td>51038103: Rialto LLC 51038104: Simon Trust</td>
<td>Both parcels are fully developed with commercial buildings and parking lots built in 2005 and 2006. No potential for historic architecture on parcels and no need for field survey.</td>
</tr>
<tr>
<td>8</td>
<td>3518301</td>
<td>On east side of Pyramid Highway south of Disc Drive</td>
<td>Pyramid Way, Sparks, NV 89436</td>
<td>Daytwa Assets LLC</td>
<td>Undeveloped parcel between Pyramid Highway and Wedekind Park. No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey. Note: Although there are remnants of two structures within the parcel; they are sufficiently diminished in integrity to warrant evaluation as archaeological resources and fall within the survey limits of the Class III Cultural Resources Inventory that was conducted.</td>
</tr>
<tr>
<td>9</td>
<td>3505125</td>
<td>Parcel in Sun Valley located south of new US 395 Connector (for Alts 2 and 3 only), east side of Sun Valley Boulevard and north of El Rancho Drive</td>
<td>4400 El Rancho Drive, Washoe County 89433</td>
<td>Sierra Point LLC</td>
<td>Apartment complex and associated parking areas built in 1998. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>Map ID Reference Number</td>
<td>APN #</td>
<td>General Location</td>
<td>Address, City, County, Zip Code</td>
<td>Ownership</td>
<td>Evaluation Results</td>
</tr>
<tr>
<td>-------------------------</td>
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</tr>
<tr>
<td>10</td>
<td>8506049, 8506050, 8506057, 8506069</td>
<td>Four parcels in Sun Valley located east of Sun Valley Boulevard and north of new US 395 Connector under Arterial Alts 1 and 4.</td>
<td>53, 55, 57, and 79 Franks Lane, Sun Valley, 89433</td>
<td>8506049, 8506050 and 8506057: Guy and Mary Ellen, Archer Living Trust 8506069: Zoyla and Juan Hernandez</td>
<td>Modular residences on all four parcels with initial lot improvements dating between 1990 and 1999. Although assessor data indicates that one structure was built as early as 1976, initial lot improvements on this parcel dates to 1999. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>11</td>
<td>3536601</td>
<td>Narrow parcel in Sun Valley located east of Sun Valley Boulevard.</td>
<td>Sun Valley Washoe County</td>
<td></td>
<td>No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>12</td>
<td>Not applicable</td>
<td>Slivers along portions of Pyramid Highway, US 395, and Dandini Boulevard located between the Direct and Indirect APE, added to Indirect APE.</td>
<td>Not applicable Existing road rights-of-way</td>
<td></td>
<td>These areas were added to the Indirect APE per SHPO’s 9/6/17 request to eliminate perceived gaps between the Direct and Indirect APE in these areas. All these areas have been heavily disturbed from construction of existing roadways. No potential for historic architecture in these areas and no need for field survey.</td>
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E. Summary of Previous NRHP Eligibility Determinations for Historic Architecture Resources and Effect Recommendations

Historic Architecture Resource Eligibility Determinations

After receiving SHPO’s original concurrence on the architectural APE on October 11, 2011, FHWA and NDOT consulted with your office regarding NRHP eligibility determinations for historic architecture resources within the APE, which resulted in your concurrence in letters dated August 31, 2012 and April 3, 2013. Those eligibility determinations remain unchanged and are provided in Table 2 for your convenience (note: shaded rows in Table 2 are intended to associate historic districts with their contributing features and to differentiate the three historic districts). Historic architecture resources were assessed for NRHP eligibility from public rights-of-way (sidewalks, in the right-of-way, or in other public spaces) because the property owners did not authorize site access (refer to the Architectural Inventory Report, Section IV-Methodology, for details). Due to this limited site access, historic architecture resources remain unevaluated under Criterion D, except Prosser Valley Ditch, which was also evaluated as an archaeological resource and recommended not eligible under Criterion D (see discussion below). The Architectural Inventory Report (pages 32-33) describes the NRHP evaluation criteria specific to this project for evaluating historic architecture resources under NRHP criteria A, B, or C. The Architectural Inventory Report also describes land usage themes and sub-themes on page 32 and Section V-Historic Context.

Of the 19 historic architecture resources evaluated for NRHP eligibility (see Table 2), five have been determined NRHP-eligible as described below and shown on Figure 2. The remaining 14 properties have been determined not NRHP-eligible.

- **Sierra Vista Ranch Historic District (SHPO Resource No. D93):** This historic district is a ranch complex built during the early to mid-20th century and has been in operation since the 1910s (see Figure 4). Today, the ranch includes a ranch house (constructed 1953), a two-car garage (constructed 1940), a three-car garage (constructed 1949), two sheds (constructed 1915, 1940), a livestock barn (constructed 1954), a barn (constructed 1940), and a grain bin (constructed 1950). The ranch contains five buildings that are not visible from the road, and a modern house. No buildings remain from the ranch’s original (1910s) construction. At present, the northern portion of the district is heavily vegetated around the buildings, while the southern portion is used for pasture. The historic district boundary matches the parcel boundary and encompasses 8.6 acres. Observations of ranch buildings that could be recorded from public rights-of-way indicated that the ranch should be considered eligible under Criterion C because it contains important examples of a typical mid-20th century ranch house and ranch outbuilding construction. The buildings and ranch appear to have the necessary associations to be considered eligible under Criterion A. No associations with important figures in local ranching history have been identified; therefore, the ranch is not recommended eligible under Criterion B. The buildings appear to retain sufficient integrity (setting, location, design, feeling, association, and workmanship) to merit NRHP eligibility (Architectural Inventory Report, Section VI-Survey Results). In summary, the site has been determined NRHP eligible under Criteria A and C.

- **Trosi Family/Kiley Ranch Historic District (SHPO Resource No. D94):** This historic district is a portion of a ranch complex built during the early 20th century and has been in operation since the 1920s (see Figure 5). Today, the ranch includes a ranch cottage (constructed 1920), a large “L”-shaped barn (constructed ca. 1940), livestock shed (constructed ca. 1940), and a chicken house (constructed 1940). The district’s boundary matches the parcel boundary and encloses 6.6 acres. The building complex is associated with the theme of small farms and ranches that made a significant contribution to the evolution of local farming and ranching. The ranch is
representative of a once vastly larger population of the property type (that of small farms and ranches in the Spanish Springs Valley and Reno/Sparks area), which has substantially declined and is rapidly disappearing. The district also retains historic integrity in terms of location, design, setting, materials, workmanship, and feeling. Therefore, the property is recommended eligible under Criterion A. The buildings are in their original location, and have no additions or modifications that impair the quality of design, materials, and workmanship (historic fabric). Thus, the site is recommended eligible under Criterion C. No associations with important figures in local ranching history have been identified; therefore, the ranch is not recommended eligible under Criterion B (Architectural Inventory Report, Section VI-Survey Results). In summary, the site has been determined NRHP eligible under Criteria A and C.

**Iratcabal Farm Historic District (SHPO Resource No. D95):** This historic district is a farm complex built during the early to mid-20th century, and has been in operation since the 1930s (see Figure 7). Today, the farm includes a bunkhouse (constructed 1930), a privy (constructed ca. 1930), a pumphouse (constructed 1945), a mobile home/travel trailer (constructed 1956), a house (constructed 1945), a garage (constructed ca. 1945), a dairy barn (constructed 1930), a shed (constructed 1956), a livestock shed (constructed 1950), and a metal shed (constructed ca. 1960). The district’s boundary matches the parcel boundary and encompasses 5.18 acres. The building complex is strongly associated with the theme of small farms and ranches that made a significant contribution to the evolution of local farming and ranching, which has substantially declined in the area. This farm complex is recommended eligible under Criterion A for its associations with mid-20th century Spanish Springs Valley farming and ranching, and under Criterion C as representative of the construction methods and materials common to western Nevada ranches of the early to mid-20th century. No associations with important figures in local ranching history have been identified; therefore, the ranch is not recommended eligible under Criterion B (Architectural Inventory Report, Section VI-Survey Results). In summary, the site has been determined NRHP eligible under Criteria A and C.

**Prosser Valley Ditch (SHPO Resource Nos. S820, WA5234, WA6134):** The Prosser Valley Ditch consists of a segment of an earthen ditch system. The ditch project began as part of a statewide plan to develop arid lands and promote the growth of agriculture in Nevada. The ditch was constructed in various phases, and the portion in the project area was built prior to 1908. It was determined NRHP-eligible under Criterion A in 1995. The resource was reevaluated as part of this undertaking and nothing was found to suggest that the overall resource should be considered ineligible for the NRHP. The ditch is considered NRHP-eligible under Criterion A as representative of the irrigation mania that occurred between the 1890s and the early 1900s, and as representative of the dozens of speculative irrigation and land development projects attempted across Nevada and the West during that time. Moreover, the history of this site also touches on other significant trends in Nevada water development, such as the dominant role of the Bureau of Reclamation’s Newlands Project in the region. Thus, the site, even though it apparently never carried water, is considered significant under Criterion A as representative of local water development attempts by private enterprise. Current research uncovered evidence that supports the ditch’s eligibility under Criterion B for its association with the careers of important Reno business leaders and local politicians, such as Francis G. Newlands, P. L. Flannigan, and Walter H. Harris, and their attempts to use irrigation as a vehicle for land speculation.

Portions of three segments (lettered A, B, and C) of the remaining ditch intersect the Arterial Alternative footprints and total approximately 0.93 mile in length (see Figure 9). All of the recorded segments are in poor condition; they are overgrown and are impacted by erosion, development, and recreational vehicle use. The ditch has been completely obliterated along its path in several places. Segments A and B north of Dandini Boulevard have lost their integrity due
to natural forces and recreational vehicle use. Segment C located south of Dandini Boulevard has a discernible prism and ditch rider’s path and thus retains a higher degree of integrity than Segments A and B; however, it too has been completely obliterated in several areas by recreational vehicle use. Given its relative integrity, Segment C has been determined to contribute to the significance of the Prosser Valley Ditch while Segments A and B do not due to their lack of integrity. The resource does not have any significant water engineering features or characteristics within the recorded section to merit eligibility under Criterion C. The archaeological survey conducted in late 2014/early 2015 indicated that ditch Segment C is still eligible under Criteria A and B, and is unevaluated under Criterion D. Therefore, the resource is eligible for the NRHP under Criteria A and B.

- **Orr Ditch (SHPO Resource Nos. S828, 26Wa5352):** The Orr Ditch is a 19th century irrigation ditch that traverses the study area in a north-south direction (see Figure 2). The ditch extends beyond the Study Area; approximately 12.5 miles of the ditch fall within the Study Area. Because the ditch is a linear site, the condition and integrity of the site varies widely along its length. The ditch has been previously evaluated in multiple reports (conducted outside of this undertaking) since 1993 and is considered eligible under criteria A, B, and C, with contributing and non-contributing segments. In October 2011, the study team identified locations where the project footprint potentially intersected ditch segments and conducted a field survey of those locations. The Arterial Alternatives are located along the same alignments as the original build alternatives; therefore, the survey results noted here remain valid for the Arterial Alternatives under consideration. The survey found that the potential intersection points have no integrity due to modern maintenance and improvements made to the ditch; in some locations the ditch is located under a shopping mall and paved parking lot. In fact, most of the potential ditch intersection locations were found to be located outside the proposed project footprint. Please refer to the Architectural Inventory Report for details. FHWA has determined that ditch segments intersected by the project footprint are non-contributing elements of the overall resource.
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</tr>
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<tbody>
<tr>
<td>1</td>
<td>D93</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Historic District</td>
<td>N/A</td>
<td>1915-1954</td>
<td>Eligible (includes eight contributing properties [B11946-B11953] that are not considered individually eligible and five considered as non-contributing properties [of which four are unevaluated due to lack of access/visibility])</td>
</tr>
<tr>
<td>2</td>
<td>B11946</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch House</td>
<td>Small wood-framed, single story, gable-roofed house</td>
<td>1953</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>3</td>
<td>B11947</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Garage 1</td>
<td>No style. Detached, 2-car garage with Pyramidal roof</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>4</td>
<td>B11948</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Garage 2</td>
<td>No style. Detached, 3-car garage with gable roof</td>
<td>1949</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>5</td>
<td>B11949</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Livestock Barn</td>
<td>No style</td>
<td>1954</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>6</td>
<td>B11950</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Shed 1</td>
<td>No style</td>
<td>1915</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>7</td>
<td>B11951</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Shed 2</td>
<td>No style</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>8</td>
<td>B11952</td>
<td>Pyramid Way</td>
<td>Sierra Vista Barn</td>
<td>No style</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>9</td>
<td>B11953</td>
<td>Pyramid Way</td>
<td>Butler Bin</td>
<td>Butler bin</td>
<td>1950</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>10</td>
<td>D94</td>
<td>7000 Sparks Boulevard</td>
<td>Troso Family/Kiley Ranch Historic District</td>
<td>N/A</td>
<td>1920 – ca. 1940</td>
<td>Eligible (includes four contributing properties [B11954-B11957] that are not considered individually eligible and no non-contributing properties)</td>
</tr>
<tr>
<td>11</td>
<td>B11954</td>
<td>7000 Sparks Boulevard</td>
<td>Troso Family Ranch/Dundrea House</td>
<td>No style/vernacular. One-story square plan, simple hipped roof dwelling</td>
<td>1920</td>
<td>Not individually eligible. Contributing element to Troso Family Kiley Ranch Historic District</td>
</tr>
<tr>
<td>12</td>
<td>B11955</td>
<td>7000 Sparks Boulevard</td>
<td>Troso Family Ranch “L” Barn</td>
<td>No style vernacular</td>
<td>1930</td>
<td>Not individually eligible. Contributing element to Troso Family Kiley Ranch Historic District</td>
</tr>
<tr>
<td>13</td>
<td>B11956</td>
<td>7000 Sparks Boulevard</td>
<td>Troso Family Ranch Livestock Shed</td>
<td>No style/vernacular</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Troso Family Kiley Ranch Historic District</td>
</tr>
<tr>
<td>14</td>
<td>B11957</td>
<td>7000 Sparks Boulevard</td>
<td>Troso Family Ranch Chicken House</td>
<td>No style/vernacular</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Troso Family Kiley Ranch Historic District</td>
</tr>
</tbody>
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<tbody>
<tr>
<td>15</td>
<td>B11958</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm Historic District</td>
<td>N/A</td>
<td>1930 – ca. 1960</td>
<td>Eligible (includes ten contributing properties [B11958-B11967] that are not considered individually eligible and no non-contributing properties)</td>
</tr>
<tr>
<td>16</td>
<td>B11959</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm House</td>
<td>Post WW II/Ranch</td>
<td>1945</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>17</td>
<td>B11960</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm Bunkhouse</td>
<td>N/A</td>
<td>1945</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>18</td>
<td>B11961</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Mobile Home</td>
<td>N/A</td>
<td>1956</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>19</td>
<td>B11962</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm</td>
<td>No style/vernacular</td>
<td>1930</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>20</td>
<td>B11963</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm Garage</td>
<td>Post WW II</td>
<td>1945</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>21</td>
<td>B11964</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm Dairy Barn</td>
<td>No style/vernacular</td>
<td>1950</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>22</td>
<td>B11965</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm Livestock Shed</td>
<td>No style/vernacular</td>
<td>1956</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>23</td>
<td>B11966</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm Shed</td>
<td>No style/vernacular</td>
<td>ca. 1960</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>24</td>
<td>B11967</td>
<td>2710 Spanish Springs Road</td>
<td>Iratcabal Farm Metal Shed</td>
<td>No style/vernacular</td>
<td>1945</td>
<td>Not individually eligible. Contributing element to Iratcabal Farm Historic District</td>
</tr>
<tr>
<td>25</td>
<td>B11968</td>
<td>4728 E. Leonisio Drive</td>
<td>Flavia Neyes House</td>
<td>Post WW II, Contemporary Folk</td>
<td>1971</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>26</td>
<td>B11969</td>
<td>4710 W. Leonisio Drive</td>
<td>Vickie Tonner House/Ronald C.</td>
<td>Post WW II, Contemporary Folk, double-wide mobile home</td>
<td>ca. 1965 for lot and initial building, current home built in 1982</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>27</td>
<td>B11970</td>
<td>4850 Leonisio Drive</td>
<td>Sandra Vantilborg Home/W.E. &amp; S.K. Neeld Home</td>
<td>Post WW II, Contemporary Folk, double-wide manufactured home</td>
<td>1971</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>28</td>
<td>B11971</td>
<td>4734 W. Leonisio Drive</td>
<td>Gyford Taylor Home/Wanda L. Taylor Home</td>
<td>Post WW II, Contemporary Folk, double-wide manufactured home</td>
<td>1971</td>
<td>Not Eligible</td>
</tr>
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</tr>
<tr>
<td>30</td>
<td>B11972</td>
<td>955 Skaggs Circle</td>
<td>William Burris House</td>
<td>Post WW II, Contemporary Folk, double-wide manufactured home</td>
<td>1966</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>31</td>
<td>B11973</td>
<td>5051 Sagebrush Drive</td>
<td>Oliver and Beth Maddox House/Patricia Mitchell House</td>
<td>Post WW II, Contemporary Folk, mobile home with large addition</td>
<td>1961</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>32</td>
<td>B11974</td>
<td>4870 Skaggs Circle</td>
<td>Mary McGuire House/Richard N. &amp; Carol S. Paris House</td>
<td>Post WW II, Contemporary Folk, double-wide manufactured home</td>
<td>1963</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>33</td>
<td>B11975</td>
<td>7900 Pyramid Way</td>
<td>Pyramid &amp; Bank Produce Shed/Naniloa Investment Co. Produce Shed</td>
<td>No style/vernacular</td>
<td>1925</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>34</td>
<td>B11976</td>
<td>5045 Sunflower Drive</td>
<td>Anthony Avellano House/Phillip &amp; Anita Tate House</td>
<td>Post WW II, Contemporary Folk, single-wide manufactured home</td>
<td>1971</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>35</td>
<td>B11977</td>
<td>6550 Pyramid Way</td>
<td>Oasis Mobile Estates</td>
<td>Residential mobile home park</td>
<td>1965</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>36</td>
<td>S820, Wa5234, Wa6134</td>
<td>Sun Valley, NV</td>
<td>Prosser Valley Ditch</td>
<td>Irrigation ditch</td>
<td>ca. 1905</td>
<td>Previously determined eligible in 1995. One contributing segment and two non-contributing segments.</td>
</tr>
<tr>
<td>37</td>
<td>S821</td>
<td>Sparks, NV</td>
<td>Old Pyramid Highway</td>
<td>Unknown</td>
<td>1934-1935</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>38</td>
<td>S828, 26Wa3532</td>
<td>Spanish Springs, NV</td>
<td>Orr Ditch</td>
<td>Irrigation ditch</td>
<td>1872</td>
<td>Previously considered eligible with contributing and noncontributing segments in multiple reports since 1993. Ditch segments within APE have been determined non-contributing to resource due to modern maintenance and improvements that have removed elements of its historic fabric. The 2011 field survey found that ditch has no integrity in areas intersected by project.</td>
</tr>
<tr>
<td>39</td>
<td>B11979</td>
<td>620 Queen Way</td>
<td>Reno Arch Missionary Church/Baik Building</td>
<td>N/A</td>
<td>N/A</td>
<td>Determined Not Eligible in 2013 under a separate project (Pyramid Way and McCarran Boulevard Intersection Improvement Project)</td>
</tr>
<tr>
<td>40</td>
<td>B11987</td>
<td>560 Queen Way</td>
<td>Sparks Christian Church</td>
<td>N/A</td>
<td>N/A</td>
<td>Determined Not Eligible in 2013 under a separate project (Pyramid Way and McCarran Boulevard Intersection Improvement Project)</td>
</tr>
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<tr>
<td>41.</td>
<td>B11980</td>
<td>5745 Wedekind Road</td>
<td>Matthew H. Gibbons House/Van Meter House</td>
<td>N/A</td>
<td>N/A</td>
<td>Determined Not Eligible in 2013 under a separate project (Pyramid Way and McCarran Boulevard Intersection Improvement Project)</td>
</tr>
</tbody>
</table>

Note: Row shading is intended to associate historic districts with their contributing features and to differentiate the three historic districts.
Historic Architecture Resource Effect Recommendations

Following are effect determinations made for historic architecture resources as a result of construction of the Arterial Alternatives, based on the current preliminary level of design. The Arterial Alternatives were fully described in Attachment A of our April 19, 2017 letter to your office (attached). As you know, effect determinations for the three NRHP-eligible historic districts included in the list below were evaluated and included in the project-specific Programmatic Agreement (PA) that your office helped develop. However, the project-specific PA has been set aside and the 2014 Transportation PA is now being used for this undertaking. Based on results of the visual impact analysis (described later in this section) conducted for the Arterial Alternatives, as well as the traffic noise, air quality, and cumulative analyses conducted under the Final EIS currently being prepared, the effect recommendations for the three historic districts have changed from those noted in previous consultation.

1. **Sierra Vista Ranch Historic District (SHPO Resource No. D93):** The design of all Arterial Alternatives is the same in the vicinity of this historic district. No direct impacts would occur to this resource or its contributing features under the Arterial Alternatives. Design changes included in the Arterial Alternatives eliminated grade-separated interchanges previously proposed along Pyramid Highway north of Sparks Boulevard, including the proposed grade-separated interchange at the Pyramid Highway/Dolores Drive intersection located approximately 1,890 feet west of the northwestern boundary of this historic district (and the northwestern-most building within the district). Only at-grade improvements are proposed in the vicinity of this historic district. These include widening Pyramid Highway from four lanes to six lanes with a median with turn lanes, installing traffic signals with street lights at the Pyramid Highway/Dolores Drive intersection. For street lights, NDOT typically uses Type 7 Poles, which would be 32 feet 4 inches above the roadway surface. Each of the traffic signal poles would include a street light on top. These poles would be similar in height to the Type 7 poles. An approximate 400-foot long feeder road would be constructed running southeast from the intersection and terminating approximately 1,500 feet from the northwestern-most point of the historic boundary (see Figure 4). No retaining walls would be constructed in the vicinity of this resource. Existing vertical elements along Pyramid Highway and at the Pyramid Highway/Dolores Drive intersection include street lights, street signage, and power poles/power lines. Based on their height (32 feet, 4 inches) and thinness, street lights would not be visually distinguishable beyond approximately 800 feet. The northwestern-most boundary of the Sierra Vista Ranch Historic District (and the northwestern-most building within the district) is located approximately 1,890 feet from the Pyramid Highway/Dolores Drive intersection, which is well beyond the point where traffic signals and lighting would be visually distinguishable. As a result of design changes made under the Arterial Alternatives, the undertaking will not result in visual effects to this resource. Further, the impact assessment conducted under the Final EIS indicated that the historic district and its contributing features will not experience traffic noise, air quality, or cumulative impacts as a result of the undertaking. Therefore, the undertaking would have no indirect effects to this resource.

The ranch buildings within the historic district are eligible under Criterion C because they contain important examples of typical mid-20th century ranch house and ranch outbuilding construction, and the buildings and ranch appear to have the necessary associations to be considered eligible under Criterion A. The project would have no direct or indirect effects to the historic district or its contributing elements and, therefore, would not alter the characteristics of the historic property that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Therefore, FHWA recommends **No Historic Properties Affected for this resource.**
2. **Trosi Family/Kiley Ranch Historic District (SHPO Resource No. D94):** All Arterial Alternatives propose a grade-separated interchange at Pyramid Highway/Sparks Boulevard, with Pyramid Highway crossing over Sparks Boulevard. No direct impacts would occur to this resource or its contributing features under the Arterial Alternatives. Proposed improvements include the following:

   a. A grade-separated interchange and interchange entry and exit ramps would be constructed to provide access between Pyramid Highway and Sparks Boulevard. At-grade improvements include a four or six-lane Pyramid Highway (depending on the alternative), and minor improvements to Sparks Boulevard where it ties into the proposed improvements at Pyramid Highway. Sparks Boulevard would remain at existing grade. The proposed Pyramid Highway bridge roadway surface would vary in elevation, at a maximum height of 25 feet above the Sparks Boulevard road surface. The bridge would be eight feet thick to allow for a standard 16-foot clearance. The bridge edges would be lined with a 42-inch-tall solid concrete railing in accordance with NDOT standards.

   b. Earthen slopes, not retaining walls, would be used for the bridge and ramps associated with the Pyramid Highway/Sparks Boulevard interchange. A retaining wall approximately 800 feet long would be built along Pyramid Highway between Golden View Drive and Kiley Parkway to minimize right-of-way acquisitions under Arterial Alternatives 2 and 4. The retaining wall would have an average height of approximately 6 feet, with a maximum height of approximately 13 feet.

   c. Street lighting would also be installed. NDOT typically uses Type 7 Poles for this type of interchange. The pole height would be 32 feet 4 inches above the roadway surface. Three poles would be placed at each ramp gore, for a total of 12 poles. Additional light poles would be placed along Sparks Boulevard and Highland Ranch Parkway approaching the interchange, similar to those present today. No lights would be installed on the bridge itself, and high mast lighting is not anticipated due to the rural residential setting. The approximate heights of the light poles for the ramps at their proposed location above the existing ground would be as follows (note that the heights listed below include both the pole height and proposed roadway improvements and represent the tallest elements at the interchange):
   - Northbound off-ramp: 52 feet
   - Northbound on-ramp: 50 feet
   - Southbound off-ramp: 41 feet
   - Southbound on-ramp: 43 feet

   d. Two traffic signals would also be installed – one at each interchange intersection. Each of the signal poles would include a street light on top. These poles would be similar in height to the Type 7 poles. The elevation of the signals and lights would be very similar to those at the existing Sparks Boulevard intersection.

   e. Signing would also be installed in advance of the interchange. Overhead signs would be placed in advance of the ramp exits. The tops of these signs would be approximately 25 feet above the roadway surface.

A visual analysis of proposed improvements in proximity to this historic resource was conducted in early 2017 based on the Arterial Alternative designs. The analysis involved preparing a photo visual simulation of proposed improvements as viewed from the northwestern boundary of the historic district and measuring the distance between the historic district and proposed improvements. Existing vertical elements at the Pyramid Highway/Sparks Boulevard interchange and along Pyramid Highway include traffic signals with street lights on top, street light poles,
street signs, and power poles/power lines. Existing vertical elements along Sparks Boulevard include street lights and roadside and median commercial landscaping in the form of trees and shrubs. The visual analysis found that the proposed improvements described above would be visually indistinguishable from the northwestern boundary of the ranch located approximately 800 feet southeast of the interchange (see Figure 6). Therefore, the proposed interchange and retaining wall along Pyramid Highway would be visually indistinguishable from the northernmost buildings within the district (which are located approximately 1,165 away from the interchange), and would not result in visual effects to this resource. The existing street lighting along Pyramid Highway and Sparks Boulevard, the more distant light effects from residential developments, and lights from vehicles traveling along Pyramid Highway and Sparks Boulevard currently result in nighttime light effects to the historic district. The additional nighttime light effects associated with the proposed traffic and street lights are not anticipated to be considerable compared to existing conditions. Further, the impact assessment conducted under the Final EIS indicated that the historic district and its contributing features would not experience traffic noise, air quality, or cumulative impacts as a result of the undertaking. Therefore, the undertaking would have no indirect effects to this resource.

The historic district is eligible under Criteria A and C because it is associated with the theme of small farms and ranches that made a significant contribution to the evolution of local farming and ranching. The physical characteristics of the farm/ranch are present, and the buildings are in their original location, with no additions or modifications that impair the quality of design, materials, and workmanship (historic fabric). Further, the historic district retains integrity of location, design, setting, materials, workmanship, and feeling. The project would have no direct or indirect effects to the historic district or its contributing elements and, therefore, would not alter the characteristics of the historic property that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Therefore, FHWA recommends No Historic Properties Affected for this resource.

FHWA is aware of a planned Kiley Ranch North Phase Three Development that was approved by the City of Sparks in January 2013 (see attached), which would redevelop the entire Trosi/Kiley Ranch Historic District as residential and/or commercial uses. This proposed development is occurring completely independent of the Pyramid Highway/US 395 Connector project, and such development would occur whether or not the proposed Pyramid Highway/US 395 Connector project was constructed. While the proposed Kiley Ranch development is not associated with this undertaking, RTC and NDOT will provide documentation for the Trosi/Kiley Ranch Historic District that was prepared under Section 106 consultation conducted for this undertaking to the City of Sparks for their information and to use as they see fit.

3. Irrtcabal Farm Historic District (SHPO Resource No. D95): No direct impacts would occur to this resource or its contributing features. Proposed improvements closest to this historic district include minor widening of Disc Drive between Pyramid Highway and Vista Boulevard, and a grade-separated interchange at or west of (depending on the alternative) Pyramid Highway at Disc Drive. A visual analysis was conducted in early 2017 based on the Arterial Alternative designs that consisted of evaluating views toward proposed improvements from the northern and western boundaries of the historic district. It was found that the proposed at-grade improvements along Disc Drive located approximately 1,260 feet (0.24 mile) north of this resource, and the proposed Pyramid Highway/Disc Drive grade-separated interchange, which would be located no closer than approximately 5,500 feet (1.04 mile) west of the historic district, would not be visually distinguishable from this historic district and its contributing features (see Figure 7 and Figure 8). Further, the impact assessment conducted under the Final EIS has determined that the historic district and its contributing features would not experience traffic noise, air quality, or cumulative impacts as a result of the undertaking. Therefore, the undertaking would have no
indirect effects to this resource.

The historic district is eligible under Criterion A because it is associated with mid-20th century Spanish Springs Valley farming and ranching and the theme of small farms and ranches that made a significant contribution to the evolution of local farming and ranching. The historic district is eligible under Criterion C as representative of the construction methods and materials common to western Nevada ranches of the early to mid-20th century. The project would have no direct or indirect effects to the historic district or its contributing elements and, therefore, would not alter the characteristics of the historic property that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Therefore, FHWA recommends No Historic Properties Affected for this resource.

4. Prosser Valley Ditch (SHPO Resource Nos. S820, WA5234, and WA6134): This resource is evaluated as both a historic architecture and archaeological resource. The impacts to Segment C of this ditch were outlined and illustrated in our June 19, 2017 letter to your office and are summarized here. All Arterial Alternatives would directly impact Segment C of this resource located south of Dandini Boulevard at one location due to construction of a 10-foot-wide shared-use path across the ditch. To avoid new impacts to the ditch, the original path alignment was moved approximately 100 feet to the west to cross the ditch at an area that has been obliterated by a dirt road created by informal recreational vehicle use. The shared-use path would be constructed in this area slightly above the existing ground level in order to traverse the hilly terrain and maintain the five percent grade required for the path. Gentle earthen slopes would spread out a maximum of 8 feet on each side of the path where it crosses the ditch to provide a transition from the path elevation to the existing ground level. Because the existing ditch has been obliterated in this area, no bridge or culvert would be needed for the path crossing to maintain the original ditch contours. Therefore, the path would be constructed with minor grading, which would reduce visual effects compared to structural crossings. The path would result in approximately 30 feet of permanent impacts to the ditch, with an additional 5 linear feet on each side of the path temporarily impacted during construction. The slopes and all temporarily disturbed areas along the new path would be revegetated consistent with the surrounding natural terrain. Areas of the ditch temporarily impacted by path construction would be returned to preconstruction conditions, including regrading and reseeding.

Alternate alignments for the east-west trending shared-use path were evaluated; however, because the Prosser Valley Ditch trends north-south, no alternative could avoid crossing the ditch. Further, alternate path alignments would cross the ditch in areas where it has not been obliterated, and would require construction of a bridge or the installation of a culvert to preserve the existing shape of the ditch. Please refer to our June 19, 2017 letter for details about alternatives considered to avoid impacts to the ditch and reasons that the alternatives were eliminated.

In addition, the new path would block access to the existing dirt road that has damaged the path at the proposed crossing location, and would also block access to another dirt road that crosses the ditch approximately 400 feet to the north. By blocking these accesses, the path would discourage continued off-road vehicle damage to the path in those areas, thus helping to preserve Segment C of the ditch.

The Prosser Valley Ditch is eligible for the NRHP under Criteria A and B for its association with speculative irrigation and land development projects attempted in Nevada in the late 19th and early 20th centuries, and its association with local business leaders and politicians and their attempts to use irrigation as a vehicle for land speculation. The physical condition of the ditch is poor, has been completely obliterated in several areas, and has no significant water engineering
features or characteristics and is, therefore, not eligible under criterion C. The path would introduce visual changes to Segment C of the ditch and surrounding area from the construction of a pathway across the ditch and through the undeveloped area surrounding the ditch, as well as the installation of a safety railing at the steep slope for path user safety. However, these visual effects are considered minor considering that the visual setting of the ditch has already been compromised by numerous off-road paths and dirt roads that have been cut into the undeveloped slopes and through the proposed pathway location by off-road recreational vehicle use. As such, the path would not alter the association characteristics that qualify Segment C as a contributing feature of the NRHP-eligible ditch. The ditch would continue to convey its association with local business leaders and politicians associated with the speculative irrigation and land development in the late 19th and early 20th centuries that render the ditch NRHP eligible under Criterion B. Impacts to Segment C of the Prosser Valley Ditch would not alter the association characteristics of the entire historic linear resource that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Thus, FHWA recommends No Adverse Effect for this resource.

5. Orr Ditch (SIPO Resource Nos. S828, 26Wa5352): All Arterial Alternatives would intersect certain segments of the ditch within the APE. However, those intersected segments have been determined to lack integrity and are non-contributing elements to the resource (see Figure 2 and the Architectural Inventory Report for details). Because the project would impact non-contributing elements of the ditch, the project would not alter the characteristics of the historic linear resource that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Therefore, FHWA recommends No Historic Properties Affected for this resource.

F. Summary of Previous NRHP Eligibility Recommendations for Archaeological Resources and Effect Recommendations

Archaeological Resource Eligibility Recommendations

In our September 9, 2015 letter, FHWA and NDOT consulted with your office regarding eligibility determinations for archaeological resources within the Preferred Alternative footprint plus 100-foot buffer. As noted earlier in this letter, Arterial Alternative 3 has been identified as the Preferred Alternative, which has the same design and alignment as Revised Alternative 3, the previously identified Preferred Alternative for which the 2014/2015 intensive pedestrian archaeological survey was conducted. As such, the eligibility determinations for archaeological resources remain unchanged from those noted in our September 9, 2015 letter. This section summarizes NRHP eligibility determinations for archaeological resources as outlined in that letter and documented in A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (WCRM, 2015). Please refer to those two documents for details.

In your October 14, 2015 response letter, you did not indicate your position on the NRHP eligibility recommendations for archaeological resources, and requested a copy of the File and Literature Search and Preliminary Field Survey: Archaeological Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (March 5, 2012; Revised May 17, 2012). A copy of that report is attached.

The 2014/2015 intensive survey identified 62 previously unrecorded archaeological sites and 40 isolated finds, and an attempt was made to revisit 21 previously recorded sites. Of the 62 previously unrecorded sites, 59 sites are recommended Not Eligible and three are recommended Eligible for the NRHP. Of the 21 previously recorded sites, four are isolated artifacts and are categorically Not Eligible for the NRHP, six sites no longer exist, six sites have been determined Not Eligible for the NRHP, four sites are recommended Not Eligible for the NRHP, and one site has been determined Eligible for the NRHP.
Four archaeological sites are recommended NRHP eligible, including one irrigation ditch (Prosser Valley Ditch) and three lithic sites. The Prosser Valley Ditch is evaluated under both historic architecture and archaeological resources. The Prosser Valley Ditch is discussed under Historic Architecture Resources and is not repeated here. The other three archaeological resources are described below. Please refer to Table 4 for a summary of these four sites.

1. **Quarry/Intensive Lithic Reduction; Prospect Complex (26Wa9822):** This site is a multicomponent Prehistoric Quarry/Intensive Lithic Reduction site and Prospect Complex. Only a portion of this site was recorded because the site extends onto private property, for which access for this survey was not authorized. The site straddles an east-west trending ridge topped by an outcrop of chert boulders and extends down and across a knoll in the valley below. The large Prehistoric Quarry/Intensive Lithic Reduction site was focused on the procurement of the light gray chert toolstone exposed in boulder outcrops on site. This primary exposure contains hundreds of tested chert boulders and associated debris. Three isolated tested boulders were given feature numbers. Artifacts related to the chert quarrying activities include: 19 chert tested cobbles, five chert cores, a chert biface, and hundreds of pieces of lithic debitage. In addition, the area also has naturally occurring clear quartz crystals within the igneous bedrock stratigraphically adjacent to the chert. Seven perfectly formed clear quartz crystals were noted on site in addition to the inclusions of occasional crystals within the bedrock. An igneous bedrock anvil with deep percussion scars was noted near the crystals and may have aided in their extraction, or in the reduction of nearby chert cobbles. In addition, a well-ground milling stone was recorded. This milling stone, along with four tested cobbles, and one of the tested boulders, was located within Concentration A. The possibly historic features include six prospect pits that target the igneous/chert contact across the site. However, the only artifacts or temporally diagnostic artifacts associated with these pits are modern in age, all post-dating the 1970s. Therefore, these may be modern pits that should be considered impacts to the prehistoric site. The site is in fair condition due to modern dumping, recreational use, and possible reseeding activities on portions of the slope. Animal burrowing and slope wash down the steepest slopes have also affected spatial integrity; however, within the boulder field (quarry area) spatial integrity is intact and buried cultural remains are possible within the relatively gradual slope in the northern portion of the site. Although the site has been impacted by recreational use, dumping, historic prospecting, and possible reseeding of the slopes, it does retain its integrity of location, design, and setting. Given that this site lacks any form of temporal control, it cannot address the broad patterns of history in the project area and is recommended not eligible for the NRHP under Criterion A. The site cannot be associated with an individual and is, therefore, recommended not eligible for the NRHP under Criterion B. The site lacks features that embody distinctive characteristics of a type, period, or method of construction, or individual distinction, and is, therefore, recommended not eligible for the NRHP under Criterion C. The historic component is of unknown age and consists of prospect pits that cannot meaningfully address Mining thematic concerns. It is, therefore, recommended not eligible for the NRHP under Criterion D. However, the prehistoric component is a chert, and possibly quartz crystal quarry that can address thematic concerns regarding Lithic Technology and Procurement within the project area through geochemical sourcing. In addition, this site has some potential for buried cultural remains that may address other thematic concerns. As a result, the prehistoric component of this site is recommended eligible for the NRHP under Criterion D.

2. **Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature (26Wa9841):** This site is a multicomponent Prehistoric Quarry/Intense Lithic Reduction Site and Historic Isolated Feature (possible prospect pit) straddling a ridge spine with chert bedrock outcrops. The
focus of both prehistoric and possible historic activity is a light gray chert bedrock outcrop exposed near the top of the ridge. The surface is rocky with poorly sorted gravels and cobbles. Vegetation is sparse and includes snakeweed, bunchgrass, rabbitbrush, and shadscale. Six shallow pits are located near the top of the ridge that are likely prehistoric quarry pits, but animal burrowing has obscured the features. Conversely, these may relate to historic prospecting activities. Features include one possible historic prospect pit, two possible prehistoric quarry pits, and eight tested boulders or quarry areas. Approximately 1,500 pieces of lithic debitage were noted across the site along with cobbles and chert cores. The bulk of these are near tested boulders. The site is in fair condition with recreational impacts (e.g., abundant shotgun shells and pistol cartridges), animal burrowing, slope wash, and vehicular traffic on nearby roads. Although the site has been impacted by recreational use and animal burrowing, it does retain its integrity of location, design, and setting. Given that this site lacks any form of temporal control, it cannot address the broad patterns of history in the project area and is recommended not eligible for the NRHP under Criterion A. The site cannot be associated with an individual and is, therefore, recommended not eligible for the NRHP under Criterion B. The site lacks features that embody distinctive characteristics of a type, period, or method of construction, or individual distinction, and is, therefore, recommended not eligible for the NRHP under Criterion C. The historic component is of unknown age and consists of a prospect pit that cannot meaningfully address mining-thematic concerns. It is, therefore, recommended not eligible for the NRHP under Criterion D. However, the prehistoric component is a chert quarry that can address thematic concerns regarding lithic technology and procurement within the project area. In addition, this site has some potential for buried cultural remains that may address other thematic concerns. As a result, the prehistoric component of site 26Wa9841 is recommended eligible for the NRHP under Criterion D.

3. Quarry/Intensive Lithic Reduction; Prospect Complex (26Wa9856): This site straddles a bedrock knoll overlooking Sun Valley. It is a multi-component site that includes a prehistoric chert quarry alongside a historic prospecting complex. The site contains two prehistoric lithic concentrations centered on outcrops of an orange-brown lustrous chert, a prehistoric quarry pit, three historic prospect pits, a cut platform, a lumber pile, and an ovate sediment-and rock mound within a rock ring that may have served as a tank foundation or other unknown purpose. Though the site contains a scatter of modern debris (including bottle glass, plastic, and cans), no items were found in the general site area that could be determined historic. However, a 1966 aerial photograph shows fresh excavated prospect pits, which could be mid- to late-twentieth century age. Concentration A has chert densities estimated at over 1000 pieces per square meter. Concentration A has been impacted by mid-twentieth century prospecting with a large pit excavated into the same chert vein. Concentration B contains the prehistoric quarry pit. An adjacent mid-twentieth century prospect pit again seems to have targeted the chert vein adjacent to the concentration. Chert densities within Concentration B were also estimated to over 1000 pieces per square meter. The condition of the site is fair. Modern two-tracks, ATV tracks, and trash indicate frequent recreational use at the site. In addition, a power line crosses east-west through the northern portion of the site, which is also truncated by a housing development. The historic prospecting complex is of mid-twentieth century age given the presence of two freshly excavated prospect pits evident on the 1966 aerial photo of the area. As such, the historic component cannot address mining-thematic concerns identified for this area. It post-dates the period of significance (1896-1920) for the Wedekind Mining District and does not contain the types of features necessary to address questions important to our understanding of mining technology. Therefore, the historic component of this site cannot address historic patterns identified as important and does not satisfy NRHP Criterion A requirements. The site cannot be associated with an individual and is, therefore, recommended not eligible for the NRHP under Criterion B. The site does not contain unique or emblematic feature types necessary to address
NRHP Criterion C, and the historic component of the site does not have further data potential (Criterion D). Therefore, the historic component of this site is recommended not eligible for any NRHP criteria. The prehistoric component does not contain the temporally distinct artifact types necessary to address changes in broad patterns through time and is, therefore, recommended not eligible for the NRHP under Criterion A. The site cannot be associated with an individual and is, therefore, recommended not eligible for the NRHP under Criterion B. The only prehistoric feature on site is a simple pit that is not unique or emblematic, and the prehistoric component is, therefore, recommended Not eligible for the NRHP under Criterion C. However, the prehistoric component does contain a quarry pit targeting a natural chert vein. Although sediments here are generally shallow, some subsurface potential exists within the quarry pit, which may reveal unique quarrying methods. As such, the prehistoric component may be able to further our understanding of Lithic Procurement in the region. As such, the prehistoric component of this site is recommended eligible for the NRHP under Criterion D for its data potential.

Table 3: Archaeological Resources Not Eligible for the NRHP

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Resource Name and/or Type</th>
<th>Eligibility Determination/Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Previously Recorded Sites</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26Wa3259</td>
<td>Historic</td>
<td>Building Vestige</td>
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<tr>
<td>26Wa3408</td>
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<td>Historic Trash Scatter</td>
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<td>Prospects and Modern Trash Midden</td>
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<tr>
<td>26Wa5403</td>
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<td>26Wa6966</td>
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<tr>
<td>26Wa6977</td>
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<td>Transportation - Road</td>
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<td>State #</td>
<td>BLM#</td>
<td>Site Temporal Affiliation/Component</td>
<td>Resource Name and/or Type</td>
<td>Eligibility Determination/Recommendation</td>
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<td>Prehistoric Isolated Artifact; Isolated Historic Prospect</td>
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<td>Prehistoric Simple Food Processing Site; Prospect Complex</td>
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<tr>
<td>26Wa9799</td>
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<td>Prehistoric; Historic/ Multicomponent</td>
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<td>Non-Significant/Not Eligible</td>
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<td>26Wa9800</td>
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<td>Simple Lithic Assemblage</td>
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<tr>
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<td>Prospect Complex</td>
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<tr>
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<tr>
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<td>BLM#</td>
<td>Site Temporal Affiliation/Component</td>
<td>Resource Name and/or Type</td>
<td>Eligibility Determination/Recommendation</td>
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<td>---------------------------</td>
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<td>Non-Significant/Not Eligible</td>
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</tr>
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<td>26Wa9852</td>
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<tr>
<td>26Wa9853</td>
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<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
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<td>26Wa9854</td>
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<tr>
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<td>Prehistoric Simple Lithic Assemblage, Prospect Complex</td>
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</tr>
<tr>
<td>26Wa9861</td>
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<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact, Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
</tr>
<tr>
<td>26Wa9862</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
</tr>
</tbody>
</table>
Table 4: Archaeological Resources Eligible for the NRHP

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Resource Name and/or Type</th>
<th>NRHP Eligibility Evaluation</th>
</tr>
</thead>
</table>

Newly Recorded Sites

<table>
<thead>
<tr>
<th>Site #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Resource Name and/or Type</th>
<th>NRHP Eligibility Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa9822</td>
<td>CrNV-03-9665</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component - Recommended Eligible (Criterion D); Historic component – Not Eligible</td>
</tr>
<tr>
<td>26Wa9841</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature</td>
<td>Prehistoric Component - Recommended Eligible (Criterion D); Historic component – Not Eligible</td>
</tr>
<tr>
<td>26Wa9856</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component - Recommended Eligible (Criterion D); Historic component – Not Eligible</td>
</tr>
</tbody>
</table>

Archaeological Resource Effect Recommendations

Following are effect recommendations for NRHP-eligible archaeological resources as a result of construction of the Preferred Alternative (Arterial Alternative 3). Where they differ, the project impacts and effect recommendations described in this letter supersede those described in previous Section 106 correspondence and survey reports.

The Preferred Alternative would potentially impact three archaeological sites determined eligible for the NRHP under Criterion D (summarized immediately following this paragraph), and one archaeological site (Prosser Valley Ditch) eligible under NRHP Criteria A and B. Impacts to Prosser Valley Ditch under the Preferred Alternative cannot be avoided; refer to the discussion for Prosser Valley Ditch under historic architecture resources earlier in this letter. The study team evaluated the Preferred Alternative alignment to determine if impacts to the other three archaeological sites could be avoided or minimized. Results of that analysis and resultant effect determinations are summarized below. Please refer to our September 19, 2015 letter and the A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (WCRM, 2015) for details.

4. Quarry/Intensive Lithic Reduction; Prospect Complex (26Wa9822): This site is located within the Preferred Alternative disturbance footprint and would be directly impacted by construction of the US 395 Connector, involving excavation, grading, and paving. It was found that moving the Preferred Alternative alignment to avoid or minimize impacts to this site is not feasible or practical. Due to the topographic conditions, any alignment shift would greatly increase earthwork and project costs, and would increase visual, habitat and water quality effects. Because this site cannot be avoided, FHWA recommends an Adverse Effect to this resource.

5. Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature (26Wa9841): This site is located within the Preferred Alternative disturbance footprint and would be directly impacted by construction of the US 395 Connector, involving excavation, grading, and paving. It was found that moving the Preferred Alternative alignment to avoid or minimize impacts to this site is not feasible or practical. Due to the topographic conditions, any alignment shift would greatly increase earthwork and project costs, as well as increase visual, habitat and water quality effects. Because this site cannot be avoided, FHWA recommends an Adverse Effect to this resource.
effects. Because this site cannot be avoided, FHWA recommends an Adverse Effect to this resource.

6. Quarry/Intensive Lithic Reduction; Prospect Complex (26Wa9856): This site is located within the Preferred Alternative disturbance footprint and would have been directly impacted by construction of the US 395 Connector. However, it was determined that impacts to this site can be avoided by minor design modifications, such as slightly steeping the slope. Therefore, FHWA recommends No Historic Properties Affected for this resource.

G. Summary of Effect Recommendations for Historic Architecture and Archaeological Resources

Effect recommendations for NRHP-eligible resources are summarized in Table 5.

Table 5: Summary of Effect Determinations

<table>
<thead>
<tr>
<th>NRHP-Eligible Resource</th>
<th>Effect Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sierra Vista Ranch Historic District (SHPO Resource No. D93)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Trosi Family/Kiley Ranch Historic District (SHPO Resource No. D94)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Iratcabal Farm Historic District (SHPO Resource No. D95)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Prosser Valley Ditch (SHPO Resource Nos. S820, WA5234, WA6134)</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>Orr Ditch (SHPO Resource Nos. S828, 26Wa5352)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9822)</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature (SHPO Resource No. 26Wa9841)</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9856)</td>
<td>No Historic Properties Affected</td>
</tr>
</tbody>
</table>

Determination of Effect for Undertaking

The undertaking would result in No Historic Properties Affected for four historic architecture resources (Sierra Vista Ranch Historic District, Trosi Family/Kiley Ranch Historic District, Iratcabal Farm Historic District, and Orr Ditch), and No Adverse Effect to one historic architecture/archaeological resource (Prosser Valley Ditch). The undertaking would result in an Adverse Effect to two archaeological resources and No Historic Properties Affected to one archaeological resource. Therefore, FHWA has determined that the undertaking will result in an overall Adverse Effect.

H. Notification of Section 4(f) Approach

Notification of Section 4(f) De Minimis

The undertaking has been determined to have No Adverse Effect to the Prosser Valley Ditch (SHPO Resource Nos. S820, WA5234, and WA6134). Based on the foregoing, FHWA may make a de minimis finding for the Section 4(f) requirements for this property based on your concurrence with the No Adverse Effect determination. A de minimis impact involves the use of a Section 4(f) property that is generally minor in nature. For historic properties, a de minimis impact is one that results in a Section 106 determination of No Adverse Effect or No Historic Properties Affected.

Section 4(f) Exception (23 CFR 774.13(b))

Based on the foregoing information and findings in the A Class III Cultural Resources Inventory of the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (WCRM, 2015), FHWA has
concluded that sites 26Wa9822, 26Wa9841, and 26Wa9856 are important chiefly because of what can be learned by data recovery and have minimal value for preservation in place.

I. Request for Concurrence with Indirect APE, Eligibility and Effect Recommendations, and request for Acknowledgement of Section 4(f) Approach

We respectfully request your review and concurrence with the Indirect APE that has been modified as you requested in your September 6, 2017 letter, and review and concurrence with the eligibility and effect determinations and recommendations for historic architecture and archaeological resources described above. We also request your written acknowledgement of the de minimis notification and written acknowledgement that you do not object to the finding that sites 26Wa9822, 26Wa9841, and 26Wa9856 are important chiefly because of what can be learned by data recovery and have minimal value for preservation in place. This information has also been forwarded concurrently to the following consulting parties for review: Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California, and BLM. We will notify you of any responses received from these groups. We look forward to your review and comment, and moving forward towards the Memorandum of Agreement.

Sincerely,

C. Cliff Creger
Chief Cultural Resources Program Manager

Enclosures:

- Figures:
  Figure 1: Direct and Indirect APEs on USGS Topographic Map
  Figure 2: Direct and Indirect APEs and NRHP-eligible Historic Architecture Resources within the APE
  Figure 3: Indirect APE and Arterial Alternative Elements on Aerial with Photo Locations
  Figure 4: Arterial Alternative Footprints in Vicinity of Sierra Vista Ranch Historic District
  Figure 5: Arterial Alternative Footprints in Vicinity of Trosi Family/Kiley Ranch Historic District
  Figure 6: Visual Simulation of Arterial Alternatives Viewed from Trosi Family/Kiley Ranch Historic District
  Figure 7: Arterial Alternative Footprints in Vicinity of Iracabal Farm Historic District
  Figure 8: Views of Proposed Improvement Areas from Iracabal Farm Historic District
  Figure 9: Prosser Valley Ditch Segments A, B, and C within APE
- File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (March 5, 2012; Revised May 17, 2012)
- A Class III Cultural Resources Inventory or the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (WCRM, 2015)
- Table A: Viewshed Photos, by Segment
- Kiley Ranch North Phase Three Development Plan, 2013
- Section 106 Correspondence
cc:  Abdelmoez Abdalla, FHWA  
    Jacob Waclaw, FHWA  
    Dale Wegner, FHWA  
    Greg Novak, FHWA  
    Pyramid Lake Paiute Tribe  
    Reno-Sparks Indian Colony  
    Washoe Tribe of Nevada and California  
    Rachel Crews, BLM  
    Doug Maloy, RTC  
    Jim Clarke, Jacobs
Figure 1: Direct and Indirect APEs on USGS Topographic Map

(separate PDF file – this is USGS topo map with both APEs on it, with newly added areas to Indirect APE numbered)
Figure 3: Indirect APE and Arterial Alternative Elements on Aerial with Photo Locations

(separate PDF file with project elements coded, segments labeled, and photo locations labeled)
Figure 6: Visual Simulation of Arterial Alternatives Viewed from Trosi Family/Kiley Ranch Historic District

Existing view from northwest boundary of Trosi/Kiley Ranch Historic District looking northwest toward proposed Pyramid Highway/Sparks Boulevard grade-separated interchange – a distance of approximately 800 feet.

Visual simulation of Pyramid Highway/Sparks Boulevard grade-separated interchange as viewed from northwest boundary of Trosi/Kiley Ranch Historic District – a distance of approximately 800 feet.
Figure 8: Views of Proposed Improvement Areas from Iratcabal Farm Historic District

This power pole is approximately located at Disc Drive/Sparks Blvd intersection.

Photo source: Google Streetview

View from northern portion of the Iratcabal Farm Historic District looking north toward Disc Drive (not visible in background).

Photo source: Google Streetview

View from northern portion of the Iratcabal Farm Historic District looking northwest toward the Pyramid Highway/Disc Drive intersection (not visible in background).
In Reply Refer To:
CCDO-CR-18-045
8100 (NVC0200)

C. Cliff Creger
Chief Cultural Resources Program Manager
Nevada Department of Transportation
1263 S. Stewart Street
Carson City, Nevada 89712

Re: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Determinations of Eligibility and Effects for Historic Architecture and Archaeological Resources
and Section 4(f) de minimis Notification. EA73391; NDOT #WA11-009; FHWA # DE-019(067); SHPO Undertaking # 2010-0884; SHPO Report #8041; BLM Report # CRR 3-2635

Dear Mr. Creger,

The Bureau of Land Management, Sierra Front Field Office (BLM) has reviewed the Nevada Department of Transportation’s (NDOT) letter and enclosures dated October 19, 2017 for the above-referenced Undertaking. The BLM appreciates the summary of prior correspondence between NDOT, the Nevada State Historic Preservation Office and the Federal Highways Administration (FHWA) regarding this project, as well as the report summarizing consultation between NDOT/FHWA and Native American tribes.

The BLM has previously reviewed NDOT/FHWA’s determinations of Area of Potential Effect (APE), approaches to identification, and documentation of archaeological and architectural resources for this Undertaking. NDOT’s updates to APE and determinations of effect are noted. The BLM has no specific comments, but notes that eligible site 26WA9822/CrNV-03-9665 is located partly on public lands managed by the BLM. Following NDOT’s determination that direct adverse effects cannot be avoided by construction of the preferred alternative, the BLM looks forward to working with NDOT/FHWA in developing a Memorandum of Agreement to resolve adverse effects to this site.

Sincerely,

Bryant D. Smith
Field Manager
Sierra Front Field Office
Ms. Rebecca Palmer  
State Historic Preservation Officer  
Nevada State Historic Preservation Office  
901 S. Stewart Street, Suite 5004  
Carson City, Nevada 89701-4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada  
Completion of Determinations of Eligibility and Effects for Historic Architecture and Archaeological Resources  
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);  
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

Thank you for your November 17, 2017 letter, wherein you concurred with the Indirect Area of Potential Effects (APE) established for the above-referenced undertaking, noted your concurrence with eligibility determinations for historic architecture resources, concurred with eligibility determinations made for certain archaeological resources, and posed questions and requests regarding documentation for archaeological resources. Thank you for the concurrences noted in your letter.

The purpose of this letter is to respond to the requests and questions in your November 17, 2017 letter, which are enumerated below, with responses provided under each. Information previously provided to your office that differs from that provided in this letter is superseded by this letter.

1. The SHPO assumes that the direct APE, as illustrated in Figure 1, has been completely surveyed (e.g., Class III) for archaeological resources for this undertaking pursuant to Stipulation V.C of the Programmatic Agreement (PA). If this is not the case, please notify this office at your earliest convenience. Response: Your assumption is correct.

2. The site form for 26Wa6543 states "On November 14, 2014, archaeologists from WCRM attempted to revisit the site. They found it had been destroyed as a result of pre-construction earth moving activities and a large hole is present where the site was located." Please provide additional clarification with regards to these pre-construction activities. Response: The pre-construction activities noted on the site form are not associated with this undertaking. The site form has been modified to clarify this and is attached. It is not known for what project those observed activities are associated.

3. The SHPO notes that the site form for 26Wa6999 is missing from the subject documents. Upon receipt of this site form the SHPO will resume its review of NDOT's NRHP eligibility determination. Response: The site number is Wa6966 (SHPO transposed the number in the November 17, 2017 letter). The site form for 26Wa6966 is attached.

4. The SHPO notes that the site forms for the following archaeological resources are incomplete. Upon receipt of the missing information, the SHPO will resume its review of NDOT's NRHP eligibility determinations:
Ms. Rebecca Palmer  
State Historic Preservation Officer  
Nevada State Historic Preservation Office  
901 S. Stewart Street, Suite 5004  
Carson City, Nevada 89701-4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada  
Completion of Determinations of Eligibility and Effects for Historic Architecture and  
Archaeological Resources  
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);  
SHPO Undertaking # 2010-0884; SHPO Report # 8041

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1. The SHPO assumes that the direct APE, as illustrated in Figure 1, has been completely surveyed (e.g., Class III) for archaeological resources for this undertaking pursuant to Stipulation V.C of the Programmatic Agreement (PA). If this is not the case, please notify this office at your earliest convenience. **Response: Your assumption is correct.**

2. The site form for 26Wa6543 states "On November 14, 2014, archaeologists from WCRM attempted to revisit the site. They found it had been destroyed as a result of pre-construction earth moving activities and a large hole is present where the site was located." Please provide additional clarification with regards to these pre-construction activities. **Response: The pre-construction activities noted on the site form are not associated with this undertaking. The site form has been modified to clarify this and is attached. It is not known for what project those observed activities are associated.**

3. The SHPO notes that the site form for 26Wa6999 is missing from the subject documents. Upon receipt of this site form the SHPO will resume its review of NDOT's NRHP eligibility determination. **Response: The site number is Wa6966 (SHPO transposed the number in the November 17, 2017 letter). The site form for 26Wa6966 is attached.**

4. The SHPO notes that the site forms for the following archaeological resources are incomplete. Upon receipt of the missing information, the SHPO will resume its review of NDOT's NRHP eligibility determinations:
a. 26Wa7123 - updated site photos are missing from the subject documents illustrating that this site has been substantially altered since the last recording, which did include photographs, in 2003. Please provide the missing photo-documentation showing the altered state of this site. Response: Updated site photos and photo log for this resource are attached to this letter and labeled with the resource’s site number.

b. 26Wa8267 (CrNV-03-5834) - updated site photos are missing from the subject documents illustrating that this site has been substantially altered since the last recording, which did include photographs, in 2003. Please provide the missing photo-documentation showing the altered state of this site. Response: Updated site photos and photo log for this resource are attached to this letter and labeled with the resource’s site number.

c. 26Wa9785 (CrNV-03-9628) - the site sketch map provided was copied incorrectly. Thus, much of the information is obscured and illegible. Please provide a complete and legible copy of the site sketch map. Response: A complete and legible copy of the sketch map for resource 26Wa9785 (CrNV-03-9628) is attached.

5. The SHPO cannot concur that 26Wa9793 (CrNV-03-9636) is not eligible for listing in the NRHP as it was not evaluated under an appropriate historic context or research design. This resource seems to have been incorrectly categorized under the Property Type of a "Prospect Complex," which falls under the theme of Mining. As this site seems to be related to the Theme of "Settlement and Community Development" dating to the post-WWII urbanization of Sparks, this current categorization and the resultant evaluation does not apply. Upon receipt of an updated report that is expanded under the Theme of Settlement and Community Development (which would include defining Property Types, research questions, etc.), the SHPO will resume its review of NDOT’s NRHP eligibility determination. Response: In response to your comment, the documentation for this site was carefully evaluated, and we agree that the resource was incorrectly categorized. It has, therefore, been reevaluated as a mining complex and refuse dump. The report includes an appropriate historic context for these property types. The site form for this resource was updated and is attached. The report was modified where appropriate, and report replacement pages are attached.

6. The SHPO cannot concur that 26Wa9837 is not eligible for listing in the NRHP as the resource has not been completely documented. Given what has been documented within the direct APE for this archaeological resource (i.e., substantial impacts due to flooding), the SHPO would concur that recorded portions do not embody any of the Secretary’s Significance Criteria (i.e., A-D, inclusive). Please note that unidentified sections of the site remain unevaluated. Response: We have changed the eligibility recommendation for this site to unevaluated. The recorded portion of the site falls within the project’s direct APE and will be affected by the undertaking. It does not, however, include archaeological features or artifacts that could contribute to the site’s NRHP eligibility under the Secretary’s Significance Criterion D due to a lack of integrity. The unidentified portion of the site remains unevaluated. The previous determination of No Historic Properties Affected for this resource remains valid.

7. As the following linear cultural resources are not fully recorded, the SHPO would concur with NDOT’s determination that the recorded portions do not embody any of the Secretary’s Significance Criteria (i.e., A-D, inclusive). Please note that unidentified sections of these sites remain unevaluated: 26Wa9818/ CrNV-03-9661, 26Wa9832, 26Wa9847, 26Wa9854, 26Wa9855. Response: We concur and affirm herein that unidentified sections of the above-referenced sites remain unevaluated.
8. Regarding 26Wa9822 (CrNV-03-9665), it appears to SHPO that the direct effects of this undertaking will avoid the portions of the site that have the potential to contribute under the Secretary's Significance Criterion D. The southern portion of the site that will be affected by this undertaking does not include archaeological features that could contribute to the site's NRHP eligibility under the Secretary's Significance Criterion D due to a lack of potential for intact buried deposits and the secondary nature of these artifacts due to slopewash. Response: We greatly appreciate your review of impacts to this resource. Based on your evaluation noted above, FHWA and NDOT have changed our previous Adverse Effect determination for this resource to No Adverse Effect.

Summary of Effect Recommendations
Our October 19, 2017 letter provided a table summarizing effect recommendations for NRHP-eligible resources – that table has been updated to reflect NDOT/FHWA’s application of the criteria of adverse effect to each historic property (pursuant to 36 CFR 800.5) the changed effect determination noted in Comment #8 above, and is provided below. The outcome of the application of that criteria is that 7 of the 8 historic properties identified do not contribute to the project finding of adverse effect.

Table 1: Summary of Effect Determinations

<table>
<thead>
<tr>
<th>NRHP-Eligible Resource</th>
<th>Effect Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sierra Vista Ranch Historic District (SHPO Resource No. D93)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Trosi Family/Kiley Ranch Historic District (SHPO Resource No. D94)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Iratcabal Farm Historic District (SHPO Resource No. D95)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Prosser Valley Ditch (SHPO Resource Nos. S820, Wa5234, Wa6134)</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>Orr Ditch (SHPO Resource Nos. S828, 26Wa5352)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9822)</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature (SHPO Resource No. 26Wa9841)</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9856)</td>
<td>No Historic Properties Affected</td>
</tr>
</tbody>
</table>

NDOT, on behalf of FHWA, has determined that the undertaking will result in a project finding of Adverse Effect. Effects to the following resources do not contribute to the adverse effect:

- Sierra Vista Ranch Historic District (SHPO Resource No. D93)
- Trosi Family/Kiley Ranch Historic District (SHPO Resource No. D94)
- Iratcabal Farm Historic District (SHPO Resource No. D95)
- Prosser Valley Ditch (SHPO Resource Nos. S820, Wa5234, Wa6134)
- Orr Ditch (SHPO Resource Nos. S828, 26Wa5352)
- Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9822)
- Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9856)

We respectfully request your review and concurrence with eligibility determinations and the results of our application of the criteria of adverse effect for this undertaking as described in our October 19, 2017 to your office and where updated in this letter.

FHWA will notify the Advisory Council on Historic Preservation (ACHP) of the adverse effect and invite them to participate in Section 106 consultation for this undertaking. After the ACHP responds, NDOT
and FHWA will move toward development of a Memorandum of Agreement (MOA) with all consulting parties to address the adverse effect.

This information has also been forwarded concurrently to the following consulting parties for review: Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California, and BLM. We will notify you of any responses received from these groups. We look forward to your review and comment, and moving forward towards the MOA.

Sincerely,

C. Cliff Creager
Chief Cultural Resources Program Manager

Enclosures:

Updated site forms for:
- 26Wa6543
- 26Wa8267 – including updated photos and photo log
- 26Wa7123 – including updated photos and photo log
- 26Wa6966
- 26Wa9793
- 26Wa9837

Legible sketch map for site 26Wa9785

Replacement pages for report:
- Page ii: Changed the 3rd paragraph to include an unevaluated site.
- Page 47: Updated the site type for site 26Wa9793 in Table 5.
- Page 48: Updated the eligibility recommendation of site 26Wa9837 to unevaluated in Table 5.
- Page 56: Revised 4th paragraph of the description for site 26Wa6543 to reflect the site disturbance was not project related.
- Page 83: Revised the site description.
- Page 84: Revised the site description and eligibility statement.
- Page 99: Revised the recommendation of effect for site 26Wa9822 based on SHPO comments.
- Page 108: Revised eligibility recommendation for site 26Wa9837
- Page 109: Revised eligibility recommendation for site 26Wa9837
- Pages 123-129: Revised management recommendations paragraphs on pg. 123; revised Tables 6 and 7.
- Figure 3a. Revised Site Locations in Northern Portion of Project Corridor (Appendix V)
Appendix A:
Agency Coordination

Section 106
Tribal Coordination
Mr. Mervin Wright, Chairperson
Pyramid Lake Paiute Tribe
P.O. Box 256
Nixon, Nevada 89424

Dear Mr. Wright:

In recognition of your Tribe's status as a sovereign Tribal Government, and the Federal Highway Administration's (FHWA) responsibilities under the National Historic Preservation Act (NHPA), the FHWA is requesting your Government-to-Government consultation on a proposed Federal-aid highway project.

As prescribed by the National Historic Preservation Act, the FHWA follows a process (36 CFR §800) to locate historic properties which may be affected by the proposed project. These historic properties include prehistoric and historic archaeological sites as well as traditional cultural properties (TCPs). As part of this effort the FHWA would like to initiate consultation with the Pyramid Lake Paiute Tribe relative to any potential areas that your Tribe attaches religious or cultural significance to and that may be affected by the project.

This request for information of what may be of a very sensitive nature is not intended as an offense to the Tribe, but instead is our good faith attempt to protect any historic properties that may be affected by this proposed project. Public access to any information you provide concerning the location, character, or ownership of these religious and cultural properties can be restricted as per Section 304 (16 U.S.C. §4702.3) of the NHPA as amended.

In addition to the Pyramid Lake Paiute Tribe, requests for information have also been sent to the Reno-Sparks Indian Colony, and the Washoe Tribe of Nevada and California.

Project Description

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation and the Washoe County Regional Transportation Commission, is initiating a National Environmental Policy Act (NEPA) process for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS). The purpose of the proposed project is to
address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included (see enclosed map).

For your convenience, the NDOT project manager for this proposed project may be available to make a presentation to your tribal council. Please contact NDOT Native American Consultation Coordinator, Sabra Gilbert-Young, at 775-888-7483 to request a presentation.

Existing Information on Historic Properties

Initiating consultation this early in the planning stages of the proposed project has not allowed the NDOT archaeologist and the NDOT architectural historian to conduct their full background investigations yet. As soon as these studies have been completed copies will be forwarded to your office.

Based on the project description, location map of the study area, and your personal knowledge of the areas of importance to your Tribe:

1. Do you have any concerns regarding properties that are of a religious or cultural significance to your Tribe? These types of properties are also referred to as traditional cultural properties.

2. Do you have any concerns regarding the overall proposed project or specific parts of it?

If you would like additional information or have concerns regarding this proposed project, or the overall FHWA program, please contact me. I can be contacted by mailing the attached consultation response form, or you can FAX it to me at 775-687-3803, or you may telephone me at 775-687-1231. If you would like a meeting regarding this proposed project, or the overall program, I would be happy to meet with you as soon as possible.

Sincerely yours,

Abdelmoez A. Abdalla
Environmental Program Manager

Enc: EIS Study Area Map
Response Form

cc: Ben Aleck, PLPT
Cliff Creger, NDOT
S. Gilbert-Young, NDOT
Doug Maloy, RTC Washoe County
Subject: Pyramid Highway/US 395 Connector Project EIS

Return to: Mr. Abdelmoez Abdalla
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

From: Mr. Mervin Wright, Chairperson
Pyramid Lake Paiute Tribe
P.O. Box 256
Nixon, Nevada 89424

Reply: Please check one of the options below, or provide other comments, as appropriate.

[ ] The Pyramid Lake Paiute Tribe has no objection to the proposed project as planned based on the information provided. However, we wish to remain informed of any changes to the project or discoveries of historic materials during construction.

[ ] The Pyramid Lake Paiute Tribe has no objection to the proposed project as planned based on the information provided. However, we wish to remain informed of any changes to the project or discoveries of historic materials during construction. In addition, the Tribe requests that copies of environmental and cultural documents prepared for this project be forwarded to the following person:

Contact Person: __________________________
Telephone Number: ______________________

[ ] The Pyramid Lake Paiute Tribe requests further consultation to address our concerns. Please contact the following person to discuss the matter further.

Contact Person: __________________________
Telephone Number: ______________________

Signature: ________________________________
Title: ________________________________
Date: _______________

Signature: ________________________________
Title: ________________________________
Date: _______________
Level 2A Alternatives
Nevada Division

Subject: Pyramid Highway/US 395 Connector Project EIS

Mr. Waldo Walker, Chairperson
Washoe Tribe of Nevada and California
919 Highway 395 South
Gardnerville, Nevada 89410

Dear Mr. Walker:

In recognition of your Tribe's status as a sovereign Tribal Government, and the Federal Highway Administration's (FHWA) responsibilities under the National Historic Preservation Act (NHPA), the FHWA is requesting your Government-to-Government consultation on a proposed Federal-aid highway project.

As prescribed by the National Historic Preservation Act, the FHWA follows a process (36 CFR §800) to locate historic properties which may be affected by the proposed project. These historic properties include prehistoric and historic archaeological sites as well as traditional cultural properties (TCPs). As part of this effort the FHWA would like to initiate consultation with the Washoe Tribe relative to any potential areas that your Tribe attaches religious or cultural significance to and that may be affected by the project.

This request for information of what may be of a very sensitive nature is not intended as an offense to the Tribe, but instead is our good faith attempt to protect any historic properties that may be affected by this proposed project. Public access to any information you provide concerning the location, character, or ownership of these religious and cultural properties can be restricted as per Section 304 (16 U.S.C. §4702.3) of the NHPA as amended.

In addition to the Washoe Tribe of Nevada and California, requests for information have also been sent to the Pyramid Lake Paiute Tribe, and the Reno-Sparks Indian Colony.

**Project Description**

The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation and the Washoe County Regional Transportation Commission, is initiating a National Environmental Policy Act (NEPA) process for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS). The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians.
that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed
study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata
Drive. It also includes an area extending more than approximately 5 miles, from east of Vista
Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista
Boulevard to Interstate 80 also is included (see enclosed map).

For your convenience, the NDOT project manager for this proposed project may be available to
make a presentation to your tribal council. Please contact NDOT Native American Consultation
Coordinator, Sabra Gilbert-Young, at 775-888-7483 to request a presentation.

Existing Information on Historic Properties

Initiating consultation this early in the planning stages of the proposed project has not allowed the
NDOT archaeologist and the NDOT architectural historian to conduct their full background
investigations yet. As soon as these studies have been completed copies will be forwarded to
your office.

Based on the project description, location map of the study area, and your personal knowledge of
the areas of importance to your Tribe:

1. Do you have any concerns regarding properties that are of a religious or cultural significance
to your Tribe? These types of properties are also referred to as traditional cultural properties.

2. Do you have any concerns regarding the overall proposed project or specific parts of it?

If you would like additional information or have concerns regarding this proposed project, or the
overall FHWA program, please contact me. I can be contacted by mailing the attached
consultation response form, or you can FAX it to me at 775-687-3803, or you may telephone me
at 775-687-1231. If you would like a meeting regarding this proposed project, or the overall
program, I would be happy to meet with you as soon as possible.

Sincerely yours,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

cc: Darrel Cruz, WTNC
S. Gilbert-Young, NDOT  
Doug Maloy, RTC Washoe County
Subject: Pyramid Highway/US 395 Connector Project EIS

Return to: Mr. Abdelmoez Abdalla
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

From: Mr. Waldo Walker, Chairperson
Washoe Tribe of Nevada and California
919 Highway 395 South
Gardnerville, Nevada 89410

Reply: Please check one of the options below, or provide other comments, as appropriate.

[ ] The Washoe Tribe has no objection to the proposed project as planned based on the information provided. However, we wish to remain informed of any changes to the project or discoveries of historic materials during construction.

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Contact Person: ____________________________
Telephone Number: ____________________________

[ ] The Washoe Tribe requests further consultation to address our concerns. Please contact the following person to discuss the matter further.

Contact Person: ____________________________
Telephone Number: ____________________________

Signature: ____________________________
Title: ____________________________
Date: ____________________________
Level 2A Alternatives
Subject: Pyramid Highway/US 395 Connector Project EIS

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

Dear Mr. Melendez:

In recognition of your Tribe's status as a sovereign Tribal Government, and the Federal Highway Administration’s (FHWA) responsibilities under the National Historic Preservation Act (NHPA), the FHWA is requesting your Government-to-Government consultation on a proposed Federal-aid highway project.

As prescribed by the National Historic Preservation Act, the FHWA follows a process (36 CFR §800) to locate historic properties which may be affected by the proposed project. These historic properties include prehistoric and historic archaeological sites as well as traditional cultural properties (TCPs). As part of this effort the FHWA would like to initiate consultation with the Reno-Sparks Indian Colony (RSIC) relative to any potential areas that RSIC attaches religious or cultural significance to and that may be affected by the project.

This request for information of what may be of a very sensitive nature is not intended as an offense to RSIC, but instead is our good faith attempt to protect any historic properties that may be affected by this proposed project. Public access to any information you provide concerning the location, character, or ownership of these religious and cultural properties can be restricted as per Section 304 (16 U.S.C. §4702.3) of the NHPA as amended.

In addition to the Reno-Sparks Indian Colony, requests for information have also been sent to the Pyramid Lake Paiute Tribe, and the Washoe Tribe of Nevada and California.

Project Description

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Existing Information on Historic Properties

Initiating consultation this early in the planning stages of the proposed project has not allowed the NDOT archaeologist and the NDOT architectural historian to conduct their full background investigations yet. As soon as these studies have been completed copies will be forwarded to your office.

Based on the project description, location map of the study area, and your personal knowledge of the areas of importance to your Tribe:

1. Do you have any concerns regarding properties that are of a religious or cultural significance to RSIC? These types of properties are also referred to as traditional cultural properties.

2. Do you have any concerns regarding the overall proposed project or specific parts of it?

If you would like additional information or have concerns regarding this proposed project, or the overall FHWA program, please contact me. I can be contacted by mailing the attached consultation response form, or you can FAX it to me at 775-687-3803, or you may telephone me at 775-687-1231. If you would like a meeting regarding this proposed project, or the overall program, I would be happy to meet with you as soon as possible.

Sincerely yours,

Abdelmoez A. Abdalla
Environmental Program Manager

Enc: EIS Study Area Map
Response Form

cc: Michon Eben, RSIC
Doug Maloy, RTC Washoe County
Cliff Creger, NDOT
S. Gilbert-Young, NDOT
Subject: Pyramid Highway/US 395 Connector Project EIS

Return to: Mr. Abdelmoez Abdalla
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

From: Mr. Arlan Melendez, Chairperson
Reno-Sparks Indian Colony
98 Colony Road
Reno, Nevada 89502

Reply: Please check one of the options below, or provide other comments, as appropriate.

[ ] The Reno-Sparks Indian Colony has no objection to the proposed project as planned based on the information provided. However, we wish to remain informed of any changes to the project or discoveries of historic materials during construction.

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   Contact Person: __________________________
   Telephone Number: ______________________

[ ] The Reno-Sparks Indian Colony requests further consultation to address our concerns. Please contact the following person to discuss the matter further.

   Contact Person: __________________________
   Telephone Number: ______________________

Signature: __________________________________

Title: ______________________________________

Date: ______________
Level 2A Alternatives
Subject: Pyramid Highway/US 395 Connector Project EIS

Return to: Mr. Abdelmoez Abdalla
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

From: Mr. Mervin Wright, Chairperson
Pyramid Lake Paiute Tribe
P.O. Box 256
Nixon, Nevada 89424

Reply: Please check one of the options below, or provide other comments, as appropriate.

[] The Pyramid Lake Paiute Tribe has no objection to the proposed project as planned based on the information provided. However, we wish to remain informed of any changes to the project or discoveries of historic materials during construction.

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Contact Person: Ben Aleck
Telephone Number: 775-574-1088

[✓] The Pyramid Lake Paiute Tribe requests further consultation to address our concerns. Please contact the following person to discuss the matter further.

Contact Person: Mervin Wright Jr.
Telephone Number: 775-574-1000 x 102

Signature: ____________________

Title: Tribal Chairman

Date: 02/10/09
Meeting Minutes

Project: Pyramid Highway/US 395 Connector
Purpose: RSIC Meeting
Date Held: January 19, 2010
Location: RSIC Offices--Sparks, NV
Attendees
RSIC: Scott Nebesky, Steve Moran, Michon Eben
NDOT: Sabra Gilbert-Young, Chris Young
FHWA: Abdelmoez Abdalla
RTC: Doug Maloy
CH2M Hill: Cindy Potter
WCRM: Ed Stoner
Jacobs: Jim Clarke, Bryan Gant
Copies: Attendees, File

Discussion

1) Scott Neblesky started the meeting by indicating the Tribe has three primary concerns:
   a) Cultural resources
   b) The 22-acre parcel the Tribe has in trust on the southeast corner of Pyramid and Eagle Canyon;
      i) Parcel is zoned General Commercial.
      ii) Parcel has recently been improved through utility extensions and drainage improvements.
   c) Eagle Canyon serving as a through corridor, resulting in increased traffic and associated impacts to the Tribe’s Hungry Valley community.

2) Bryan Gant provided an overview of the study and remaining alternatives under consideration.

3) Jim Clarke and Ed Stoner provided an overview of EIS and Section 106 status and issues:
   a) WCRM has conducted a file search on the initial Area of Potential Effect (APE);
   b) The file search did not result in any notable ‘red flags’;
   c) WCRM has been inventorying structures greater than 40 years old on Pyramid Highway in the study area;
   d) WCRM will soon start evaluating these structures and others in the study area for eligibility for the National Register of Historic Places (NHRP);
   e) The study team will set up a meeting with the State Historic Preservation Officer (SHPO); Sabra will let Michon know when this meeting will be held.
4) Cindy Potter presented different interchange options being considered at the Eagle Canyon intersection. These options will be evaluated and refined once detailed traffic data is available. The group discussed potential effects of these options on the Tribe’s ability to develop this parcel;

   a) The Tribe expressed concern about noise walls being built between Pyramid Highway and their parcel. These barriers could reduce visibility and ease-of-access.
      i) Jim said that the Jacobs noise specialist is in the field this week conducting noise monitoring. Jim will check with her on the likelihood that noise walls would be needed for the RSIC property.

   b) Scott described the Tribe’s intent to develop this parcel to provide employment opportunities for Hungry Valley residents—many of whom are low income;

   c) The Tribe representatives asked about possible options to mitigate for economic impacts to the parcel;

   d) The Pyramid Team indicated that mitigation options are typically identified based on the results of the economic analysis conducted for the Draft EIS, with greater detail on mitigation provided as part of the Final EIS. The economic analysis will be mostly qualitative, as parcel-specific, quantitative analyses are typically not conducted for NEPA documents.

   e) Jim will provide the economic analysis methods to the RSIC representatives. Once the interchange options have been refined and the RSIC has an opportunity to review the proposed methods, FHWA and the Tribe can further discuss the approach to assess economic impacts to the RSIC parcel.

5) The Pyramid Team will research the RTC’s current Long Range Plan to check on if improvements to Eagle Canyon are included in the plan.

**Action Items**

1. The study team will set up a meeting with the State Historic Preservation Officer (SHPO); Sabra will let Michon know when this meeting will be held.

2. Jim will provide the economic analysis methods to the RSIC representatives.

3. Jim will check with the noise specialist on the likelihood that noise walls would be needed for the RSIC property.
September 1, 2010

In Reply Refer to:
HENV-NV

Subject: Consultation on Pyramid Highway-US 395 Connector Environmental Impact Statement (EIS) Project

Mervin Wright, Chairman
Pyramid Lake Paiute Tribe
P.O. Box 256
Nixon, Nevada 89424

Dear Mr. Wright:

Government to government consultation pursuant to Section 106 of the National Historic Preservation Act was initiated by a letter from FHWA on February 5, 2009. We have not received a formal response from the Pyramid Lake Paiute Tribe (PLPT) to date regarding this matter, but we would appreciate hearing from you. Enclosed is a copy of FHWA’s letter for your reference.

Since that last official communication of February 5, 2009, we have narrowed down the proposed alternatives to those shown on the enclosed map. The project, as currently proposed, will involve a series of grade separations and small interchanges along Pyramid Highway, several alternatives for going across the hills between Spanish Springs/Sparks and Sun Valley/Reno, and two primary interchange alternatives with the connector to US 395.

WCRM, Inc. has been contracted to conduct the cultural resource surveys of the alternatives being carried forward to study during the EIS process. As results of those surveys come in, the information will be shared with Mr. Ben Aleck. With that information, a more informed dialogue can take place on any cultural resources which may potentially be impacted by the proposed project. To avoid potentially impacting any areas of significance to PLPT members it
is requested that either you or Mr. Aleck review the enclosed map and advise us if there are any places that should be avoided due to cultural or religious significance.

Sincerely,

A. A. Abdalla
Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Ben Aleck, PLPT Museum
    Scott Carey, PLPT Planning
    Sabra Gilbert-Young, NDOT
November 1, 2010

In Reply Refer to:
HENV-NV

Subject: Consultation on Pyramid Highway-US 395 Connector Environmental Impact Statement (EIS) Project

Arlan Melendez
Reno-Sparks Indian Colony
98 Colony Road
Reno, Nevada 89502

Dear Mr. Melendez:

Government to government consultation pursuant to Section 106 of the National Historic Preservation Act was initiated by a letter from FHWA on February 5, 2009. We have not received a formal response from the Reno-Sparks Indian Colony (RSIC) to date regarding this matter, but we would appreciate hearing from you. Enclosed is a copy of FHWA’s letter for your reference.

Since that last official communication of February 5, 2009, we have narrowed down the proposed alternatives to those shown on the enclosed map. The project, as currently proposed, will involve a series of grade separations and small interchanges along Pyramid Highway, several alternatives for going across the hills between Spanish Springs/Sparks and Sun Valley/Reno, and two primary interchange alternatives with the connector to US 395.

WCRM, Inc. has been contracted to conduct the cultural resource surveys of the alternatives being carried forward to study during the EIS process. As results of those surveys come in, the information will be shared with Ms. Eben. With that information, a more informed dialogue can take place on any cultural resources which may potentially be impacted by the proposed project. To avoid potentially impacting any areas of significance to Colony members it is requested that
either you or Mr. Eben review the enclosed map and advise us if there are any places that should be avoided due to cultural or religious significance.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Michon Eben, RSIC-Cultural Dept.
   Scott Nebesky, RSIC-Planning Dept.
   Sabra Gilbert-Young, NDOT
September 1, 2010

In Reply Refer to:
HENV-NV

Subject: Consultation on Pyramid Highway-US 395 Connector Environmental Impact Statement (EIS) Project

Waldo Walker, Chairman
Washoe Tribe of Nevada and California
919 Highway 395 South
Gardnerville, Nevada 89410

Dear Mr. Walker:

Government to government consultation pursuant to Section 106 of the National Historic Preservation Act was initiated by a letter from FHWA on February 5, 2009. We have not received a formal response from the Washoe Tribe of Nevada and California (WTNC) to date regarding this matter, but we would appreciate hearing from you. Enclosed is a copy of FHWA’s letter for your reference.

Since that last official communication of February 5, 2009, we have narrowed down the proposed alternatives to those shown on the enclosed map. The project, as currently proposed, will involve a series of grade separations and small interchanges along Pyramid Highway, several alternatives for going across the hills between Spanish Springs/Sparks and Sun Valley/Reno, and two primary interchange alternatives with the connector to US 395.

WCRM, Inc. has been contracted to conduct the cultural resource surveys of the alternatives being carried forward to study during the EIS process. As results of those surveys come in, the information will be shared with Mr. Darrel Cruz. With that information, a more informed dialogue can take place on any cultural resources which may potentially be impacted by the proposed project. To avoid potentially impacting any areas of significance to WTNC members,
it is requested that either you or Mr. Cruz review the enclosed map and advise us if there are any places that should be avoided due to cultural or religious significance.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Darrel Cruz, WTNC THPO
    Rob Beltramo, WTNC Planning
    Sabra Gilbert-Young, NDOT
Meeting Minutes

Project: Pyramid Highway/US 395 Connection EIS Study

Purpose: Reno-Sparks Indian Colony (RSIC) Coordination Meeting

Date Held: June 17, 2011

Location: RSIC Offices

Attendees:
- CH2M HILL: Cindy Potter
- Jacobs: Bryan Gant, Jim Clarke
- NDOT: Cliff Creager, Scott Nebeskey, Sabra Gilbert-Young
- RSIC: Michon Eben, Steve Moran
- RTC: Doug Maloy

Discussion

1. Project Overview/Background

2. Bryan Gant provided overview and discussed DEIS alternatives.

3. Cindy Potter provided an overview of Eagle Canyon Interchange and effects to RSIC property.

4. Scott Nebeskey asked whether studies have been conducted on economic impact from one-way frontage roads.
   - Cindy said the FHWA doesn’t prefer two-way frontage roads.
   - Scott asked how much will you impact buildings at southwest corner?

5. Jim will check on noise analysis at Robert Banks.

6. Scott any public art or landscape theme?
   - Jimmy and Bryan will look at landscape theme for Preferred Alternative.

7. Scott asked to what extent would EIS consider traffic increases along Eagle Canyon?
Model would determine general project traffic future volumes; more detailed traffic developed only at interchange area.

Model factor in transportation projects in RTC’s illustrative plan; only in fiscally-constrained plan.

8. RTC updating RTP (Regional Trip Plan) now.

9. Cindy will provide preliminary property impact estimates.

10. BIA contact re: property acquisition of easement.

11.

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<tr>
<th>Summary of Action Items</th>
<th>Responsible Party</th>
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<tbody>
<tr>
<td>Action Item</td>
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<tr>
<td>Does FHWA have the right to take trust land?</td>
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<tr>
<td>Phoenix — Contact BIA Re:</td>
<td>Scott Nebeskey</td>
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<tr>
<td>Agreement with Ed to provide historic data to Sabra.</td>
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<tr>
<td>Provide Steve with results of wetlands field analysis</td>
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<tr>
<td>Provide traffic input analysis</td>
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<tr>
<td>Will look into RTC role do general economic impact analysis on parcel.</td>
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<tr>
<td>Prepare Alternative Description:</td>
<td>Bryan Gant</td>
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<tr>
<td>— Include No Action — Planning assumptions</td>
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<tr>
<td>— Supplementals</td>
<td></td>
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<tr>
<td>Prepare maps of 4 Alternatives:</td>
<td>Chris Primus</td>
</tr>
<tr>
<td>— Facility description</td>
<td></td>
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<tr>
<td>How to handle other modes/supplements?</td>
<td>Jim Clarke</td>
</tr>
<tr>
<td>Determine CEVP timeframe</td>
<td>Bryan Gant</td>
</tr>
<tr>
<td>BMP rejects per NDOT</td>
<td>Martinovich</td>
</tr>
<tr>
<td>Methods Doc. Review submit</td>
<td>Jim Clarke</td>
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## Summary of Action Items

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<tr>
<td>Induced growth discussion of locals</td>
<td>Jim Clarke</td>
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<td>“      “</td>
<td>Jim Clarke/Bryan Gant</td>
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<tr>
<td>Have R/W Group Review Parcels</td>
<td>McDermott</td>
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<tr>
<td>Send out/Review Rendering Proposal</td>
<td>Bryan Gant</td>
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<tr>
<td>Run/106Process by BLM</td>
<td>Jim Clarke</td>
</tr>
<tr>
<td>Coordination corridor management plan</td>
<td>Primus</td>
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</table>

J:\Transportation\241922.001 Pyramid\reports\DEIS\Appendices to DEIS\App A Agency Coord\Added to index\Tribal mtgs\061711 DRAFT RSIC Mtg Min.doc
Meeting Minutes

Project: Pyramid Highway/US 395 Connection EIS Study

Purpose: Reno-Sparks Indian Colony (RSIC) Coordination Meeting

Date Held: December 9, 2011

Location: RSIC Offices

Attendees:
- RSIC: Michon Eben, Steve Moran, Cliff Creager, Scott Nebeskey
- FHWA: Del Abdulla
- NDOT: Sabra Gilbert-Young
- RTC: Doug Maloy
- Jacobs: Bryan Gant, Jim Clarke
- CH2M HILL: Cindy Potter

Discussion

1. Project Status update

- Jim provided update on administrative Draft EIS
- Summer 2012 for Public Review of Pyramid EIS

2. Section 106 Update

- Full archeological survey/site recordation will be conducted on preferred. Walkover survey completed which did not reveal significant sites. Sabra and Michon expressed concern over only conducting recordation on preferred. Approach had been discussed at previous RSIC meeting and vetted with NDOT and FHWA prior to then. The team will share walkover survey summary with RSIC, if not provided previously.
- Draft Programmatic Agreement (PA) being prepared. Pre-draft complete. RSIC will be a participant. RSIC will provide a concurrent review of draft along with FHWA.
- SHPO does not have jurisdiction on Eagle Canyon parcel. RSIC is a THPO, therefore, THPO will be a concurring party.
Cliff will research whether RSIC should be a concurring or invited party now that Michon is THPO.
Could be a PA for SHPO and another for THPO, but probably be better as one document.

3. Discussion regarding DEIS alternatives and effects to RSIC parcel.

- June meeting with RSIC showed roadway design only. Now showing cut/fill, drainage, etc. Team sent graphic with these elements this past Fall to RSIC.
- Concerns regarding the Eagle Canyon property—Right-of-Way takes and traffic impacts.
- Site challenge is reduced footprint. Question becomes whether mitigation is appropriate and if so, what type of mitigation. Need information to make recommendation to tribal council. What are impacts to commercial potential?
- Team would need to know more about plan. Per RSIC, still planned for strip commercial.
- Jim indicated that team, as part of economic impact assessment, can drill down and take a harder look at Trust parcel. Final issue would be mitigation commitments. Possibility of exchange with another parcel. RSIC would prefer independent consultant for analysis of other similar properties for potential exchange.
- Sewer line now in place. Other utilities in place to serve property expansion.
- 24 acre Moana Nursery has 20 year lease. They plan a $900K expansion. RSIC would like to resign Moana for long term lease for larger acreage.
- Team to provide basic information on ROW process. Does Uniform Act apply to tribal property?
- When does disclosure have to occur to potential property buyers/leasees?
- Parcel development is not currently eminent. RSIC thinks interchange at Eagle Canyon may detract certain interests.
- Can advance ROW purchase occur? Feds cannot tell tribe to stop work on their parcel.
- No other issues beside economics.
- Economic analysis can be done as part of relocation analysis.

4. RTP update underway.
5. Need to contact BIA in Carson City–Athena Brown is point of contact (FHWA to contact).

<table>
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<tbody>
<tr>
<td>Action Item</td>
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<tr>
<td>Research whether RSIC should be a concurring or invited party.</td>
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<tr>
<td>Send RSIC walk-over survey data.</td>
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<tr>
<td>Send RSIC basic info on ROW process.</td>
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<tr>
<td>Provide a map of the project area parcels for RSIC review.</td>
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<td>Contact BIA to engage in the conversation</td>
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Meeting Minutes

Project: Pyramid Highway/US 395 Connection EIS Study

Purpose: BIA Coordination/Discuss RSIC Property Impacts

Date Held: January 31, 2012

Location: BIA Offices, Carson City, NV

Attendees:
- **BLM:** Jo Ann Hufnagle
- **BIA:** Amy Roberts, Roseanna Roberts, Suzette Claypool, Dan Allen, Mike Johnson (via conference call) Athena Brown
- **RSIC:** Steve Moran, Michon R. Eben, Scott Nebesky, Vicky Oldenburg,
- **RTC:** Doug Maloy
- **FHWA:** Abdelmoez Abdalla
- **NDOT:** Chris Young, Sabra Gilbert-Young
- **Jacobs:** Jim Clarke
- **CH2MHIll:** Cindy Potter

Copies: Attendees, File 550

Summary of Discussion:

1. **Project Status Update**
   - Sabra Gilbert-Young provided an overview of coordination with RSIC conducted to date.
   - Study team provided study overview.
     - Discussed alternatives development process.
     - DEIS Status.
     - RSIC currently serves as a participating agency.
     - Cindy P. provided overview of alternatives’ physical effect on RSIC parcel. Avoidance of any impacts would require realigning to the east and result in significant impacts to existing commercial properties on east side of Pyramid at Eagle Canyon and residential properties north and south of Eagle Canyon.
   - ROW Issues
a. Discussion regarding right of way effects to RSIC parcel at Pyramid/Eagle Canyon intersection:

b. Del A. explained that we’re still early in the process, and therefore it’s still very early to discuss ROW Issues. However, an idea that has emerged—wanted to discuss with BIA the possibility of “swapping” land with BLM.

c. Jo Ann H → not aware of specific process that would allow for this swap. BLM’s updated Management Plan will consider lands for federal disposal. BLM RMP might be the means identify public lands for disposal that RSIC may be interested in acquiring in the future. However, BLM land in this area likely wouldn’t have the same commercial potential.

d. Chris Y. → A relocation process/plan will be developed for the project as a whole. Trust land would be considered as a special condition in some respects. However, NDOT needs to avoid the appearance of preferential treatment for the tribe relative to other affected landowners. We can discuss issues further with NDOT ROW Division. (They were invited to meeting but could not attend due to conflicts). Jim C. will set up ROW Meeting.

e. What is process to acquire trust land? Mike Johnson: tribe would have to be compensated at fair market value. The Tribal Council would have to approve. Trust land can be condemned, but it’s done very rarely. Has to be initiated by the federal government.

f. Just because there’s suitable replacement property doesn’t mean local government will approve future trust land.

› NEPA

a. Need to contact BIA Phoenix office for any NEPA clearance needs for acquisition of trust land. Suzette Claypool can provide contact information

b. BIA invited to be a participating agency at onset of DEIS but no response received. Based on discussion, FHWA will invite BIA and RSIC to be consulting parties to the EIS. Jim → Will check on timelines for Administrative DEIS review that this involves.

c. Based on discussion, the Study team agreed to conduct an archaeological pedestrian survey for entire RSIC parcel.

› Economic Development

a. Steve Moran described economic development plans for trust parcel. RSIC concerns regarding the Eagle Canyon property—Right-of-Way takes and access/traffic impacts.
b. Site challenge to the RSIC is reduced footprint and impacts on ability to develop the property. Question becomes whether mitigation is appropriate and if so, what type of mitigation. Need information to make recommendation to tribal council. What are impacts to commercial potential?

c. 24 acre Moana Nursery has 20 year lease. They plan a $900K expansion. RSIC would like to re-sign Moana for long term lease for larger acreage.

d. It’s not just impacts to specific parcel; need to consider larger plan to provide employment opportunities to Hungry Valley.

e. RSIC would prefer independent consultant for analysis of other similar properties for potential exchange. Steve Moran would like to have FHWA and NDOT pay for economic impact assessment. Del → would RTC or NDOT pay for this? Scott N. → doesn’t BIA have any special funds for an economic study? Athena → will check with BIA NEPA/environmental staff on availability of funds.

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**Summary of Action Items**

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<tr>
<th>Action Item</th>
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<tbody>
<tr>
<td>Schedule meeting between Study team, NDOT ROW,</td>
<td>Jim C. (Jacobs)</td>
</tr>
<tr>
<td>Provide contact information for BIA NEPA staff.</td>
<td>Suzette Claypool (BIA)</td>
</tr>
<tr>
<td>Invite BIA and RSIC to be a consulting parties to the EIS.</td>
<td>Del A (FHWA)</td>
</tr>
<tr>
<td>Conduct an archaeological pedestrian survey for entire RSIC parcel.</td>
<td>Jim C. (Jacobs)</td>
</tr>
<tr>
<td>Check with BIA NEPA environmental staff on availability of funds for economic study</td>
<td>Athena Brown (BIA)</td>
</tr>
<tr>
<td>Check on timelines for Administrative DEIS review</td>
<td>Jim C. (Jacobs)</td>
</tr>
</tbody>
</table>
Meeting Minutes

Project: Pyramid Highway/US 395 Connection EIS Study
Purpose: Reno-Sparks Indian Colony Coordination Regarding Tribal Parcel
Date Held: April 26, 2012
Location: RTC Offices, Reno, Nevada

Attendees:
FHWA Del Abdalla
RSIC Michon Eben, Scott Nebesky, Steve Moran, Vicky Oldenburg
BIA Suzette Claypool
NDOT Paul Saucedo
RTC Doug Maloy
Jacobs Bryan Gant, Jim Clarke and Misty Swan (via phone)
CH2M Hill Cindy Potter

Copies: Attendees, File

Summary of Discussion:

1. The purpose of the meeting was to present the Nevada Department of Transportation’s (NDOT’s) right-of-way acquisition process, and discuss Reno-Sparks Indian Colony (RSIC) concerns and options for their parcel located near the Eagle Canyon/Pyramid Highway interchange, which would be affected by the project.

2. The meeting agenda and sign-in sheet are attached.

3. Bryan Gant began the meeting with an overview of the project status. The Administrative DEIS is currently under review by NDOT. After NDOT comments are addressed, the DEIS will be submitted to FHWA. Then the DEIS will be submitted to FHWA legal counsel and cooperating agencies for a 30-day review period. The DEIS will then be made available to the public for review. The Final EIS and a Record of Decision from FHWA are anticipated to be complete in early 2014. Project construction is expected to be phased, with construction likely starting in the southern portion no sooner than 2018. Construction in the northern portion, where the RSIC parcel is located, would likely start around 2030.

4. FHWA sent letters on March 29, 2012 to the Bureau of Indian Affairs (BIA) and the RSIC inviting them to participate as cooperating agencies on the project. A response accepting the invitation to be a cooperating agency is needed.

5. Jim Clarke provided an overview of the discussion at the previous meeting held with the RSIC on January 31, 2012. A figure was presented illustrating the project footprint at the Eagle Canyon/Pyramid Highway interchange and options for shifting the footprint. During that meeting there was discussion regarding the possibility of swapping the RSIC parcel with BLM land in another location. Initial thoughts were that there may not be BLM land in this general area that would be suitable for commercial development.
BLM was unaware of a specific process for a land swap. Discussed FHWA inviting the BIA and RSIC to serve as cooperating agencies, and overview of economic development plans for the RSIC parcel and challenges for moving forward. Discussed that a separate economic impact analysis would be helpful to the RSIC, as well as more information on NDOT’s right-of-way acquisition process.

6. Following summary of January meeting, it was discussed that there may be suitable BLM land with commercial potential available farther south in the study area. The land would not need to be located in the immediate area of the Eagle Canyon/Pyramid interchange. Scott Neblesky to provide Jim Clarke with potential locations. Jim Clarke will check with BLM regarding land in other areas identified for disposal in the current Resource Management Plan.

   - Need sufficient level of design (approximately 60 percent design) to determine exact right-of-way required. Because of project phasing, the 60 percent design for northern portion is years out.
   - Notify property owner of need for right-of-way.
   - Hire appraiser to conduct appraisal.
   - When appraisal complete, hire another appraiser to review.
   - Appraisal considers use of property and zoning. Determines highest best use of land being acquired.
   - For partial acquisition, appraisal evaluates continued viability of land use. The appraiser performs a before and after analysis in the appraisal report to determine any damages to the remainder property, in the after condition.
   - Once the appraisal and the appraisal review are complete these two documents will be used to set just compensation for the property. Once just compensation is set then a representative will be assigned to meet with the property owner to present a letter of offer for the property needed.
   - Relocation assistance is offered to all businesses, if the business must move as a result of the acquisition of the property. Relocation assistance is provided in finding replacement sites, and paying for moving and re-establishment expenses.
   - For tribal land, no condemnation is done – a deal must be negotiated. During this process, all options are on the table, including modifying the project design. NDOT wants a win/win situation for both parties.

8. RSIC is concerned about how to address uncertainty for tenants.

9. It was discussed that the Environmental Impact Statement (EIS) is a planning document. The project build-out could be 20 years out and the needs and corresponding design would need to be re-evaluated. It is not practical to make assumptions on right-of-way needs for the purposes of determining impacts to individual parcels. Jim explained that the EIS will address physical impact, access, and circulation changes, etc. Separate from the EIS, the team could possibly prepare a whitepaper that contains information such as increased traffic volumes that could be useful to RSIC and BIA.

10. What would BIA’s role be? BIA will look at EIS information and review. The BIA will take into account the RSIC’s plans for the parcel in their review.
11. RSIC is concerned about impacts from both right-of-way acquisition and change in access. Paul and Doug reiterated that we are still in the planning stages and right-of-way determination and access would not be known until a 60 percent design of a phase in this location occurs.

12. Based on the increase in traffic volumes projected by this study, there would be some project benefits to the RSIC parcel. The RSIC parcel would potentially be in a better position than other parcels in the interchange area because the limited access from the proposed freeway would concentrate commercial development in interchange areas. Development would have more exposure. The RSIC representative said this information would be helpful.

13. Regarding RSIC’s request for RTC or NDOT to fund an economic analysis, concerns were expressed that an economic analysis of the parcel at this stage would require that too many assumptions be made and would not result in a useful analysis. Until we know exactly what will be constructed, it would only be speculative.

14. RSIC concerns related to viability of property in 20 years. What tenants are viable for the site – one large tenant or several small tenants? Property owners can and do develop their properties as planned. If a project moves forward and right-of-way is required and changes in access occur, the impacts resulting from those steps are all factored into the process of determining just compensation. When appraised, NDOT evaluates the before and after condition of the parcel, which is difficult to do now if project construction is 20 to 30 years out. Some concepts have been developed for the parcel. RSIC can provide (and have provided) more detailed layout of plans for parcel. Could evaluate what types of commercial development could accommodate that size of parcel and check commercial zoning to determine how much parking is required.

15. Could an appraisal be advanced? Paul indicated that an appraisal cannot be performed because the right of way has not been determined. We are in the planning process and the discussion of an appraisal at this point in time is premature.

16. The EIS can be re-evaluated. Decisions in the EIS can change. That is why appraisal is not done until 60 percent design is complete.

17. Timing creates issues for RSIC – typically have 25-year term leases on parcel, so a 20-year timeframe for project construction creates problem for the RSIC and tenants. Need information on project timing to include in any lease.

18. The EIS includes footprint of right-of-way anticipated. EIS presents general right-of-way, traffic, and environmental impacts.

19. RSIC asked why the tribe is being involved now if you are just going ahead with the project. What is the tribe to sign-off on? This parcel is a significant property to the tribe. Can they depend on property for employment for Hungry Valley residents and revenue? The RSIC is involved in the process because they are a sovereign nation, a parcel owner, a participating agency, and (soon) a cooperating agency. In those roles, the RSIC will review the Draft and Final EIS documents and comment on the information and the process.

20. Is there sufficient information now for the RSIC to comment on? The EIS provides information on traffic access, traffic, remnant property and viability of planned
development and environmental resources such as noise, visual, etc. What additional information would the RSIC need to make comments?

21. Information described above is what RSIC anticipated would be included in an economic analysis. Discussion was that perhaps the RSIC could prepare an outline of specifics they want to know and submit to the BIA.

22. How will BIA handle impacts to the tribe? BIA would:

   a. provide technical assistance to the tribe.
   b. involve their economic and real estate people.
   c. engage their regional office.

23. Need to engage BIA’s NEPA staff - Amy Heuslein and Garry Cantley. Need to engage them to determine if there are any actions.

24. Suzette is local coordinator and reviews documents, but it is the BIA regional office that approves documents.

25. It was discussed that we will look at impacts and provide to the BIA and tribe would draw their own conclusions – not FHWA.

26. RSIC asked for a schematic of the interchange. Must keep in mind regarding footprint – cannot set right-of-way based on that. Schematic will show area of potential effect. Will provide footprint with caveat that this is best information we have at this time.

Action Items:

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<tr>
<td>Follow-up on acceptance by BIA and RSIC of FHWA invitation to serve as cooperating agencies.</td>
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<tr>
<td>Contact BLM regarding land within study area identified for disposal in the current RMP as option for land swap.</td>
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<tr>
<td>Develop whitepaper presenting potential impacts to RSIC parcel.</td>
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<td>Send schematic of interchange to RSIC</td>
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</table>
AGENDA:

1. Introductions

2. Project Status

3. Overview of January 31 Meeting/Action Item Review

4. NDOT Right-of-way Acquisition Process
   a. Factors considered in appraisal
   b. Trust land acquisition
   c. Possible timeframe for project right-of-way acquisition and construction

5. Reno-Sparks Indian Colony concerns / options for parcel
   a. Economic Analysis
   b. Proceeding with planned development
   c. Disclosure to potential property buyers/leasees
   d. Identifying suitable property replacement
   e. Information Needed for Tribal Counsel

6. Next Steps
# SIGN-IN SHEET

**Reno-Sparks Indian Colony Coordination Meeting – April 26, 2012 (9:30 A.M.)**

**Pyramid Highway and US 395 Connection Project**

**PLEASE PRINT**

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<thead>
<tr>
<th>NAME</th>
<th>REPRESENTING</th>
<th>PHONE</th>
<th>E-MAIL</th>
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<tr>
<td>Cindy Fitter</td>
<td>chrmhill</td>
<td>846-2707</td>
<td>goffrech2m.com</td>
</tr>
<tr>
<td>Larry Cox</td>
<td>Jacobs</td>
<td>650-5100</td>
<td><a href="mailto:lcoxxx03@comcast.net">lcoxxx03@comcast.net</a></td>
</tr>
<tr>
<td>Suzette Claypool</td>
<td>BIA</td>
<td>889-3570</td>
<td><a href="mailto:suzette.claypool@bighorn.gov">suzette.claypool@bighorn.gov</a></td>
</tr>
<tr>
<td>Paul Saucedo</td>
<td>NDOT</td>
<td>888-7460</td>
<td><a href="mailto:psaucedo@ni.gov">psaucedo@ni.gov</a></td>
</tr>
<tr>
<td>Michelle Staphan</td>
<td>RSIC</td>
<td>785-1363</td>
<td><a href="mailto:mstaphan@rsic.org">mstaphan@rsic.org</a></td>
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<td>Scott Neeley</td>
<td>RSIC</td>
<td></td>
<td><a href="mailto:sneeley@rsic.org">sneeley@rsic.org</a></td>
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<tr>
<td>Steve Moore</td>
<td>RSIC</td>
<td>313-3864</td>
<td><a href="mailto:smoree@rsic.org">smoree@rsic.org</a></td>
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<tr>
<td>Abdalmeen Abdalz</td>
<td>FHWA</td>
<td>687-1731</td>
<td><a href="mailto:abdalmeen@fhwa.gov">abdalmeen@fhwa.gov</a></td>
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<tr>
<td>Ricks Oldenbog</td>
<td>RSIC</td>
<td>329-2986, 3210</td>
<td><a href="mailto:ricks@fhwa.gov">ricks@fhwa.gov</a></td>
</tr>
<tr>
<td>Steve Meade</td>
<td>RTC</td>
<td>335-1865</td>
<td><a href="mailto:smeadt@smeadt.com">smeadt@smeadt.com</a></td>
</tr>
</tbody>
</table>
Hi Scott and Suzette,

We’re following up on an action item from our last discussion regarding the Pyramid Highway and 395 Connector study.

On behalf of the Federal Highway Administration (FHWA), I am sending the attached memo from FHWA that summarizes the potential impacts and benefits that may occur to the Reno-Sparks Indian Colony parcel on Pyramid Highway near Eagle Canyon Rd., as assessed in the Administrative Draft Environmental Impact Statement (EIS) for the project. As noted in the memo, the RSIC and BIA, as Cooperating Agencies, will have the opportunity to review and comment on the Administrative Draft EIS prior to completion of that document and public review. We anticipate sending you this document for review next month.

If you have any questions or would like to discuss, please don’t hesitate to call myself at the number below or Del Abdella at (775) 687-1231.

Thanks,
Jim

Jim O. Clarke, AICP
Manager of Environmental Planning—Denver

JACOBS
303-820-5218 (office)
303-820-2401 (fax)
303-335-8309 (cell)
TO: Scott Nebesky - Reno-Sparks Indian Colony (RSIC); Suzette Claypool - Bureau of Indian Affairs (BIA)

DATE: Dec. 28, 2012

FROM: Abdelmoez A. Abdalla, Environmental and Research Program Manager
U.S. Department of Transportation
Federal Highway Administration-Nevada Division

SUBJECT: Pyramid Highway/US 395 Connector Environmental Impact Statement
Summary of Potential Impacts to the Reno-Sparks Indian Colony Property

COPIES: Bureau of Indian Affairs; Doug Maloy, RTC; Chris Young, NDOT; Sabra Gilbert-Young, NDOT, Jim Clarke and Bryan Gant, Jacobs; Project File

The purpose of this memorandum is to summarize potential impacts and benefits that could result from the proposed Pyramid Highway/US 395 Connector project on a 22-acre parcel held in trust for the Reno-Sparks Indian Colony (RSIC) (RSIC parcel) by the Bureau of Indian Affairs (BIA). The RSIC parcel is located in Washoe County south of Eagle Canyon Road and west of Pyramid Highway in the northern portion of the Study Area, and is zoned commercial.

This memorandum summarizes impacts and benefits determined through the process of preparing the Administrative Draft Environmental Impact Statement (EIS). As cooperating agencies to the EIS, RSIC and BIA will have an opportunity to review and comment on the Draft EIS prior to completion of that document.

Project Background
The Federal Highway Administration (FHWA), in cooperation with the Nevada Department of Transportation (NDOT) and the Regional Transportation Commission of Washoe County (RTC), is currently preparing an EIS to identify and evaluate transportation improvements along the Pyramid Highway corridor and a proposed connection between Pyramid Highway and US 395. The Study Area surrounds the existing Pyramid Highway from Calle de la Plata at the northern end to Queen Way at the southern end. The Study Area also includes the area where portions of the proposed roadway connecting existing Pyramid Highway and US 395 (called the US 395 Connector) may be located, extending from near Dandini Boulevard on the western end to Vista Boulevard on the east end (see Figure 1 attached). FHWA has been consulting with the RSIC since inception of the EIS.

Under all build alternatives, improvements would convert Pyramid Highway to a limited-access freeway between Highland Ranch Parkway and Eagle Canyon Drive, with half interchanges at Eagle Canyon Drive, Dolores Drive, Lazy 5 Parkway, and Highland Ranch Parkway, and one-way frontage roads between each half interchange (see Figure 2 attached).

Right-of-Way Impacts
Right-of-way that may be needed to construct the proposed transportation improvements is being assessed as part of the current EIS process. Right-of-way impacts currently shown in the
Draft EIS are presented in this memorandum. Those impacts are based on a preliminary level of design, which provides an adequate level of detail to evaluate impacts for the Draft EIS. Right-of-way requirements in the EIS are conservative, and represent a worst case scenario so that design refinements that could occur during the final design process would fall within the footprint of the EIS. The final design process begins after the Record of Decision is signed, which marks the completion of the EIS process. If it were determined that right-of-way is needed beyond that shown in the EIS as a result of refinements made during the final design process, the FHWA would be required to revisit the NEPA process, including coordination with the RSIC and BIA. Because the proposed project would be implemented in stages, beginning with the southern portion of the project, it is anticipated that final design for the northern portion of the Study Area, where the RSIC parcel is located, would not occur for ten or more years, depending on funding availability for design and construction.

Re-evaluations are required after a certain amount of time has passed, as described under 23 Code of Federal Regulations Section 771.129 (Re-evaluations):

- A written evaluation of the final EIS will be required before further approvals may be granted if major steps to advance the action (e.g., authority to undertake final design, authority to acquire a significant portion of the right-of-way, or approval of the plans, specifications and estimates) have not occurred within three years after the approval of the final EIS, final EIS supplement, or the last major Administration approval or grant.
- After approval of the ROD, FONSI, or CE designation, the applicant shall consult with the Administration prior to requesting any major approvals or grants to establish whether or not the approved environmental document or CE designation remains valid for the requested Administration action. These consultations will be documented when determined necessary by the Administration.

Field reviews, additional environmental studies, and coordination with other agencies occur as necessary during the re-evaluation process.

Potential impacts to the RSIC parcel would be the same under all build alternatives. As shown currently in the DEIS, all build alternatives would require partial acquisition of the RSIC parcel for right-of-way improvements. Potential property acquisition from the RSIC parcel located along the existing Pyramid Highway alignment would be approximately 3.05 acres (13.9 percent) of the 22-acre parcel. Figure 3 (attached) shows the area of the RSIC parcel that is shown as being within the Project Footprint. The proposed improvements would provide access to the RSIC parcel from the proposed frontage road included under all build alternatives.

**Economic Impacts/Property Value**

The proposed one-way frontage road and access changes would result in out-of-direction travel. The purpose of the frontage roads proposed for this project is to manage access in the area by providing lower-speed access adjacent to the improved Pyramid freeway and to separate local traffic from higher-speed through traffic on the freeway. These changes would likely result in a net benefit to the businesses in the area, including the future commercial shopping area, by improving capacity and ease of access to the general area through the conversion of Pyramid Highway to a limited-access freeway as compared to the no-action alternative.
Employment growth in the Study Area would occur regardless of whether or not the project is implemented. However, studies show that investment in transportation infrastructure can stimulate local economies, both in the short- and long-term. Therefore, the transportation improvements and improved access provided by all build alternatives would boost the potential for economic growth and employment. In addition, areas near interchanges, such as the RSIC parcel south of Eagle Canyon Road and west of Pyramid Highway, would serve as attractive areas for business investment.

To discuss how a change in access will affect the success of a business, it is important to first determine the type of business – drive-by or destination\(^1\). For drive-by businesses (those businesses that customers frequent more on impulse or while driving by) customers expect to get in and out easily; therefore, the critical issues are visibility, signage, and convenient access. Frontage roads maintain good visibility for businesses along a major road and it is typically apparent how to enter and exit the road to get to a business.

For destination businesses (those that customers plan to visit before they start their trip, such as doctor or dentist offices, major retailers, sit-down restaurants, etc.) a driveway on a congested highway or a highway that is perceived as unsafe may intimidate customers from making the trip. Most small destination businesses benefit more from access to a lower speed minor road. Frontage roads along a highway allow customers to enter and exit businesses conveniently and safely, away from faster moving through-traffic.

An increase in property value of the RSIC parcel may occur as a result of the increased exposure and decreased traffic congestion along Eagle Canyon Road and Pyramid Highway, leading to better access because of the traffic relief that the new facility may provide along Eagle Canyon Road and Pyramid Highway.

In addition, the build alternatives would provide a new access point for the future commercial shopping area currently planned on the RSIC parcel, which could also result in an increase in property value for the parcel.

Research shows that access management improvements alone do not appear to increase or decrease business failure rates\(^2\). This makes sense considering that many factors other than highway access can affect business success. “Before and After” studies of businesses in Florida, Iowa, Minnesota, and Texas along highways where access has been managed found that the vast majority of businesses do as well or better after the access management improvements are completed. Additionally, most property owners surveyed following an access management improvement project do not report any adverse effect of the project on property values. A study of property values on Texas corridors with access management improvements found that land values stayed the same or increased, with very few exceptions\(^3\). A study of commercial property values along a major access management improvement project in Minnesota found that property values depend more on the strength of the local economy and


\(^3\) Eisele, W. and W. Frawley, *A Methodology for Determining Economic Impacts of Raised Medians: Data Analysis on Additional Case Studies*, Research Report 3904-3, Texas Transportation Institute, College Station, Texas, October 1999.
the general location of the property in the metropolitan area, and that changes in access seemed to have little or no effect to the value of parcels⁴.

The Moana Nursery consists of approximately 2 acres and is located on the RSIC parcel. Currently, the nursery has a 20-year lease, and it is our understanding that they plan to conduct a $900,000 expansion. RSIC would like to re-sign Moana Nursery for a long-term lease for larger acreage. Partial acquisition would be required from the nursery for construction of Pyramid Highway to a limited-access freeway, the new frontage road, and new access. The proposed improvements are preliminary, have not been approved and final design has not occurred, therefore they would not preclude expansion of the nursery property. Although the current access for the nursery would change, the traffic increases on the Pyramid freeway and the proposed frontage road would more than offset the impacts that could result due to the change in access because this business or others that could develop on this parcel would be provided with more exposure as a result of the proposed improvements. It is our opinion that, if property were to be acquired as shown, the remaining RSIC parcel would still allow for viable commercial development meeting the existing zoning requirements.

A study of Kansas properties impacted by access changes found that the majority were suitable for the same types of commercial uses after the access management improvement project was completed. This was true even for businesses that had direct access before the project and access only via frontage roads after project completion⁵.

The main reasons businesses succeed include experience of management, quality of customer service, quality of the product or service provided, adequate financing and investment, well-trained employees, level and nature of competition, and keeping costs competitive⁶. In fact, access is one of the lesser factors that customers will consider when weighed against price, service, product, and store amenities.

Transportation Impacts
Each build alternative is projected to increase the amount of traffic using Pyramid Highway over the No-Action Alternative. Each build alternative would result in similar traffic volume increases on Pyramid where this property is located. For each of the build alternatives, the year 2035 daily traffic volumes on Pyramid would increase by approximately 30,000 trips per day south of Calle de la Plata. Traffic volumes are similarly projected to increase to almost 110,000 trips per day north of Disc Drive. As mentioned above, this increase in traffic would result in an increased exposure to the future commercial shopping area planned for the RSIC parcel, which would benefit those businesses and this property.

Compared to the No-Action Alternative, each of the build alternatives are projected to result in an increase in total regional vehicle miles traveled (VMT). However, the increase in VMT would

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⁶ Holland, R., Planning Against a Business Failure, ADC Info #24, University of Tennessee, October 1998.
result in a decrease in vehicle hours traveled (VHT) because the increase in capacity and shift of trips from congested arterials to freeway facilities would result in less congestion and faster travel speeds.

Currently, traffic connects to Eagle Canyon Road, which would remain with the build alternatives for this project. A slight decrease in traffic volumes along Eagle Canyon Road is anticipated because traffic would be redistributed to the new frontage roads proposed with the build alternatives for this project. The frontage road would be constructed adjacent to the future commercial shopping area planned on the RSIC parcel, where there would be an increase in traffic and exposure.

**Noise Impacts**
Traffic would move closer to the future commercial shopping area as a result of the proposed one-way frontage road, resulting in potential noise impacts. However, outdoor uses are not proposed for the future commercial shopping area, and the proposed project is not recommending any noise walls in this area.

**Air Quality Impacts**
The study is federally funded and the proposed improvements are included in the Regional Transportation Commission (RTC's) 2030 Regional Transportation Plan (RTP) and the 2014 Transportation Improvement Program (TIP). The 2030 RTP was approved by RTC on November 13, 2008, and by FHWA on March 3, 2009. The 2014 TIP amendment was adopted by RTC on August 12, 2010.

The results of the project-level carbon monoxide (CO) hot spot analysis indicated that the project would meet the transportation conformity requirements because the build alternatives and the No-Action Alternative would not cause or contribute to any new localized CO violations, increase the frequency or severity of any exiting violations, or delay timely attainment of the CO National Ambient Air Quality Standards (NAAQS).

This project also meets the conformity requirements for PM$_{10}$ (particulate matter less than ten microns in diameter) because this project is not considered a project of air quality concern.

The Final EIS will contain the conformity determination. In addition, updates to the air quality analysis may need to be completed depending on the revised RTP. Results of the revised analysis would be included in the Final EIS.

**Historic and Cultural Properties**
A walkover survey and Class I records search was conducted for the Pyramid Highway project, which found no historic or cultural resources on the RSIC parcel. NDOT and RTC have agreed to survey the entire RSIC parcel for archeological resources as part of the Final EIS.

**Right-of-Way Mitigation**
Each tribe functions as a sovereign nation and has its own tribal council and rules that may vary from tribe to tribe. For rights-of-way held in trust, a “Tribal Resolution” would be required from the specific tribal council governing that land and a Letter of Decision from BIA. The Study Team has coordinated with RSIC and BIA since the onset of the EIS process. Both agencies
serve as cooperating agencies to the EIS. The Final EIS will provide further details on the proposed acquisition of the trust land.

If approved, before or during final design the RTC and/or NDOT would be required to prepare a comprehensive relocation/acquisition plan. The plan would be administered by NDOT and adhere to NDOT right-of-way requirements. Any right-of-way acquisition would comply with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970, as amended (URA) Section 205(a).

All reasonable opportunities to minimize the acquisition of or impacts to private property would be taken during the final design stage.

The preparation of the EIS that is occurring in accordance with the National Environmental Policy Act (NEPA) and any future improvements that may result from approval of the EIS, in no way precludes the RSIC or any other entity from immediate or long term commercial or residential property development. As is the case with all property acquisition for public right-of-way, at the time that the right-of-way needs are determined, the entity responsible for acquiring the property would, in accordance with the Uniform Act, assess the value of the parcel that would include any existing improvements and impacts to those improvements.
Figure 1: Study Area
Figure 2 – Elements Common to All Build Alternatives
Figure 3 – Potential Impacts at RSIC Parcel
Dear Mr. Maloy:

Thank you for the opportunity to comment and express our concerns on the proposed Pyramid Highway/US 395 Connector Project Administrative Draft Environmental Impact Statement (EIS). As a Cooperating Agency, the Reno-Sparks Indian Colony (RSIC) has participated in the discussions and refinement of the alternative approaches to address traffic related issues on the Pyramid Highway in the Spanish Springs area. We acknowledge that it is prudent to prepare long term plans for the growth and to adequately plan infrastructure well in advance of the funding and projected demand.

Since the start of the initial discussions of the project in 2008, the RSIC has continuously expressed our concerns of the project’s potential impact on cultural resources, in general, and more specifically, the adverse economic impact on the RSIC’s 24-acre retail commercial site near the intersection of Pyramid Highway and Eagle Canyon Road. We are concerned with both the acquisition of additional right-of-way as well as the significant change in the access to the site. While we have asked for an analysis of the project’s impact to be included in the EIS, we firmly believe that the EIS fails to provide adequate analysis of the economic and social impact of the proposed project on the RSIC. Without understanding the extent and character of the impacts it is difficult to discuss potential mitigation measures. It is important for all of the participating and cooperating agencies to understand that the 24-acre retail commercial site will not only generate revenues to support essential government services, it also is planned to provide employment opportunities to low-income Native American residents from Hungry Valley community. Therefore, any adverse impact will have an immediate and significant direct impact on the RSIC government and community.

It is our understanding that the analysis of the potential impact and mitigation to cultural resources will be completed at a later date once the preferred alternative is further defined. We will reserve our comments on the impact and adequacy of the management of the cultural resources until that time.
In the recent past, the RSIC has had a very productive and cooperative relationship with the Regional Transportation Commission (RTC), City of Sparks and Washoe County Water Resources in regards to the expansion and extension of public infrastructure through the RSIC Spanish Springs site. When the RSIC has received adequate information and through analysis on the various project’s impacts, we have come to reasonable and mutually beneficial agreements with the local governments. We recently granted a roadway easement to RTC to accommodate the widening of Eagle Canyon Drive and a cross-access easement to allow RTC to limit the 7-11 entrances to right-in, right-out. We agreed to relocate our commercial driveway on Eagle Canyon Drive to accommodate the intersection improvements at Eagle Canyon and Pyramid Highway. Other examples of cooperative outcomes are the granting of an 80-foot-wide drainage easement for the Spanish Springs Flood Control Project and a 40-foot effluent water line easement to the City of Sparks.

We would like to emphasize that we are not adverse to the project, but we need to have a complete economic and social impact analysis of the project in order to have meaningful discussions regarding the mitigation of the project’s impact to the economic viability of the commercial site and social impact to the RSIC Hungry Valley community. Even though the project may not be funded or constructed for many years, the analysis and mitigation should be include in the EIS because the economic impact will be realized in the interim period: when prospective tenants realize the site may be impacted in the future, they will be more likely to locate elsewhere to avoid the business impact or interruption. The mere inclusion of the project in the RTC’s transportation improvement plans and programs will have an immediate impact on the RSIC’s ability to market and enter into long term lease agreements with potential tenants.

Once again, thanks for the opportunity to comment on the Administrative Draft of the EIS and we look forward to the continued working relationship with the RTC. Please contact me at 775-785-1363 or snebesky@rsic.org if you have any question of concerns.

Sincerely,

Scott A. Nebesky
Planning Director

cc: Athena Brown, BIA Western Nevada Agency
    Abdelmoez Abdella, Federal Highway Administration
Dear Mr. Maloy:

Thank you for the opportunity to comment and express the Bureau of Indian Affairs concerns on behalf of the Reno-Sparks Indian Colony (Colony) regarding the proposed Pyramid Highway/US 395 Connector Project Administrative Draft Environmental Impact Statement (EIS).

We have reviewed the draft EIS for the Pyramid Highway-US 395 Connector Project and offer the following general comments. Given that tribal trust land is not subject to condemnation (except by special act of Congress), the economic and social impacts on the Colony’s Spanish Springs parcel located at the existing Pyramid Highway/Eagle Canyon Boulevard intersection needs to be specifically evaluated at this early stage in the overall process.

This evaluation might be done outside the NEPA process (preferably via an appraisal, in which we would collaborate on the Scope of Work), and incorporated in the final EIS only by reference. The evaluation of economic and social impacts should be completed as soon as possible, so that the parties can consider a range of mitigation measures including a land exchange (or other negotiated alternatives) if the economic value of the uniquely-configured tribal parcel would be severely diminished. The analysis of these impacts as well as any mitigation measures should be incorporated into the final EIS, and referenced in the Notice of Decision.

The Colony recently obtained a federal planning grant to fund certain development-related studies, and is also engaged in coordination discussions with an existing tenant regarding agreed-upon expansion plans. More information as to the impact of the highway project will also enable the Colony to focus these efforts to the benefit of all concerned.

If you have questions or need further clarification, please contact Gerry Emm, Deputy Superintendent of Trust Services at 775-887-3550, ext. 256.

Sincerely,

[Signature]
Superintendent
In Reply Refer To:  
HENV-NV

Mr. Scott A. Nebesky, AICP  
Planning Director  
Reno-Sparks Indian Colony  
98 Colony Road  
Reno, Nevada  89502

Re: Pyramid Highway/US 395 Connection Administrative Draft Environmental Impact Statement

Dear Mr. Nebesky:

Thank you for your March 29, 2013 letter which provided comments and concerns regarding the January 2013 Pyramid Highway/US 395 Connection Administrative Draft Environmental Impact Statement (EIS). The Federal Highway Administration (FHWA), along with the Regional Transportation Commission (RTC), and the Nevada Department of Transportation (NDOT) appreciate the Reno-Sparks Indian Colony's (RSIC) involvement throughout the study process for this proposed project. Through your participation, the study team is aware of the RSIC’s concerns regarding potential impacts to the RSIC’s development plans for the parcel located at Pyramid Highway and Eagle Canyon Drive.

Regarding your concerns about impacts to cultural resources in general, the study team has coordinated with RSIC on our Section 106 approach throughout the study. A result of this coordination is our commitment to conduct an intensive pedestrian archaeological survey of the entire RSIC parcel after a Preferred Alternative is identified in the Final EIS.

The area that will be surveyed includes the Preferred Alternative right-of-way’s limits within the Archaeological Area of Potential Effect (APE), potential temporary construction areas, such as staging areas and haul routes, and the entire RSIC parcel located at Eagle Canyon Drive and Pyramid Highway. Also, please note the Administrative Draft EIS summarizes the Section 106 activities conducted to-date, including eligibility and effect determinations on historic architecture and proposed measures to mitigate effects. It also includes the Class I records search for archaeological resources and results of the archaeological walk-over survey. The
study team has provided RSIC with this Class I and walkover survey information, and can provide the historic architecture information upon request.

To address the concerns the RSIC and Bureau of Indian Affairs (BIA) have regarding the potential social and economic impacts to the RSIC site, FHWA prepared and submitted a memorandum to the RSIC and BIA on December 28, 2012. The memorandum discussed that the proposed impacts of the project, as described in the Administrative Draft EIS, are based on a preliminary level of design which provides an adequate level of detail to evaluate impacts in the Draft EIS. Right-of-way requirements in the Draft EIS are conservative and represent a worst-case scenario so that design refinements that could occur during the final design process would fall within the project footprint as described in the Draft EIS.

The December 2012 memorandum noted that all reasonable opportunities to minimize the acquisition of or impacts to the RSIC parcel would be taken during the final design process. If it were determined during the final design process that additional right-of-way is needed beyond that described in the EIS, the FHWA would be required to revisit the National Environmental Policy Act (NEPA) process, including coordination with the RSIC and BIA. Because the proposed project would be implemented in stages, beginning with the southern portion of the project, it is anticipated that final design for the northern portion of the study area, where the RSIC parcel is located, would not occur for ten or more years depending on funding availability for design and construction.

The memorandum summarized information regarding impacts to the RSIC parcel presented in the Administrative Draft EIS. This includes noise impacts, air quality impacts, proposed right-of-way impacts (3.05 acres acquired from the 22-acre RSIC parcel), and right-of-way mitigation. It described how the proposed access changes and traffic increases under all of the build alternatives would likely result in a net benefit to businesses in the area by improving capacity, easing access to the general area, and increasing exposure to the future commercial shopping area the RSIC has planned for the parcel. The memorandum also noted that an increase in property value of the RSIC parcel may occur as a result of the increased exposure and decreased traffic congestion along Eagle Canyon Drive and Pyramid Highway, leading to better access because of the traffic relief that the improvements may provide along Eagle Canyon Road and Pyramid Highway. In addition, the new access point provided under all of the build alternatives for the future commercial shopping area currently proposed on the RSIC parcel could also result in an increase in property value for the parcel. The memorandum cited several studies that support these assertions.

The memorandum noted that any future improvement that may result from approval of this EIS in no way precludes the RSIC, or any other entity, from immediate, long-term commercial, or residential property development. This is the case with all property acquisition for public right-of-way at the time that the right-of-way needs are determined. The entity responsible for acquiring the property will, in accordance with the Uniform Act, assess the value of the parcel that would include any existing improvements and impacts.
At this time, FHWA believes that the information provided in the Draft EIS and the December, 2012 memorandum sufficiently describe the extent and character of the potential project impacts to the RSIC parcel as a result of the proposed project.

FHWA, NDOT, and the RTC look forward to the continued consultation with the RSIC and BIA as the EIS process continues and, if a build alternative is selected as the Preferred Alternative, the final design process and construction phase.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

cc: Athena Brown, BIA
ec: Sabra Gilbert Young, NDOT
    C. Cliff Creger, NDOT
    Chris Young, NDOT
    Doug Maloy, RTC
    Jim Clarke, Jacobs
Ms. Michon Eben
THPO
Reno-Sparks Indian Colony
98 Colony Road
Reno, NV 89502

Subject: Transmitting the Draft Class III Cultural Resources Report for the Proposed Pyramid Way-US 395 Interconnector Project, Washoe County, Nevada; PID Number: 73390, FHWA Number: DE-0191(065)

Dear Ms. Eben:

Government-to-Government consultation under the National Historic Preservation Act on the proposed US 395 Highway Interconnector project began in 2009 and persists today in the current consultation efforts between the Federal Highway Administration (FHWA) and your tribe.

During a meeting on 2/26/15, you were informed that you would be receiving a copy of the draft cultural resources report. The purpose of this is to afford you, and by extension the Reno-Sparks Indian Colony, the opportunity to have input into the final cultural resources report for the project. The draft report is entitled, “A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada” and is enclosed with this letter (CD-ROM). As this report contains site location data, we ask your assistance in protecting these sites from harm by storing and disposing of this information properly.

The FHWA has a period of thirty (30) days from date of receipt of this letter in which to collect your comments regarding the draft Class III report. Also, if you would like to recommend a different eligibility for any of the sites covered within the report, please do so at this time. Should you make any eligibility recommendations, it is requested that you provide us with the specific NRHP criteria and a discussion of the site and its eligibility sufficient for considering your recommendation. For your convenience, I have enclosed a copy of the FHWA Report Response Form for this project, which may assist you in expediting your response. If you have any questions regarding this draft report or the proposed project please contact Abdelmoez Abdalla, Environmental Program Manager at 775-687-1231, by fax at 775-687-3803, or by email at Abdelmoez.Abdalla@dot.gov.

Sincerely,

[Signature]
Enclosures

cc (w/out enclosures): Arlan Melendez, RSIC Chairman

ec (w/out enclosures): Abdelmoez Abdalla, FHWA
   Jin Zhen, FHWA
   Rachel Crews, BLM
   Doug Maloy, RTC-WA
   Jim Clarke, Jacobs
   C. Cliff Creger, NDOT
   Sabra Gilbert-Young, NDOT
Subject: Comments on the Draft Class III Cultural Resources Report for the Proposed US 395-Pyramid Highway Interconnector Project, Washoe County, Nevada; PID Number: 73390, FHWA Number: DE-0191(065)

Return to: Mr. Abdelmoez Abdalla
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

From: Ms. Michon Eben, THPO
Reno-Sparks Indian Colony
98 Colony Road
Reno, NV 89502

Reply: Please check one of the options below, or provide other comments, as appropriate, and return by May 8, 2015.

[ ] The Reno-Sparks Indian Colony has no comments or concerns regarding draft Class III report.

[ ] The Reno-Sparks Indian Colony enclose the following general comment(s) regarding the draft Class III report (continue on separate page if necessary):

[ ] The Reno-Sparks Indian Colony enclose the following specific comment(s) regarding the draft Class III report (begin each with the report page number and continue on separate page if necessary):

[ ] The Reno-Sparks Indian Colony recommends to the FHWA that site 26WA_________ be considered eligible/not-eligible (circle one) to the NRHP under Criterion ____ for the following reason (continue on separate page if necessary):


May 22, 2015

Mr. Abdelmoez Abdalla
Environmental Program Manager
U.S. Department of Transportation
Federal Highway Administration-Nevada Division
705 N. Plaza Street, Suite 220
Carson City, NV 89701

RE: Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, dated March 25, 2015

Dear Mr. Abdalla:

The Reno-Sparks Indian Colony (RSIC) is taking this time to comment on the Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project ("the Project") in Washoe County, dated March 25, 2015 (Inventory), which was prepared by the Western Cultural Resource Management, Inc. (WCRM). The RSIC has been an active participant as a Cooperating Agency for the Project.

The RSIC understands that the recent Inventory resulted in the documentation of 62 previously unrecorded archaeological sites and 40 isolated finds, and that an attempt was made to revisit 21 previously recorded sites. The RSIC further understands that 45 of the newly recorded sites are historic, 2 are prehistoric and 15 have both historic and prehistoric components. Of the previously recorded sites 6 have been completely destroyed by construction or development not related to this Project, 1 site has been destroyed with the exception of a single isolated artifact, and that there are 3 isolated artifacts that could not be relocated.

The RSIC is aware that 11 remaining previously recorded sites were revisited and reevaluated for significance to the National Register of Historic Places (NRHP) by WCRM. The existing site documentation for all 21 previously recorded sites was updated and, of these, 17 are historic, 2 are prehistoric, and 2 are multi-components (both European and Native American cultural resource sites).

The RSIC recognizes that several of the previously recorded sites were destroyed, heavily impacted or no longer exist. The RSIC is taking this time to comment on 3 of the Native American cultural sites. WCRM has them listed as: WA9841, WA9822 and WA9856 ("the Sites"). The RSIC understands that these Sites are categorized as a Quarry, Intensive Lithic Reduction, Historic Isolated Feature and/or Prospect Complex Sites.
The Inventory states that the Sites are eligible for Criterion D for the National Register of Historic Places (NRHP). The Inventory further states that the Sites are within the Project area footprint and will be destroyed if development proceeds in these areas; this adverse effect will be a detriment to the RSIC culture. The RSIC concurs with WCRM and highly recommends avoidance of these 3 Native American cultural sites.

The Sites have a high Native American traditional value and cultural significance for this region, and are unique to this area - any loss would be significant to the RSIC. Protecting these irreplaceable Sites will result in preserving important regional knowledge, and in creating respectful and responsible education (for both Native and non Native people) at these Sites. The RSIC requests that the Project be redesigned for the purpose of preserving and protecting the Sites.

The RSIC appreciates and is requesting continued participation and the opportunity to comment related to Project construction, development, future data recovery plans, treatment plans or mitigation plans; such participation is critical in determining whether any Project components could have an adverse impact on Native American cultural resources. Please timely notify us of any Project changes so that we can assess whether such changes could affect Native American cultural resources.

Thank you for the opportunity to comment on this important Inventory. If you have any questions or need additional information, please contact myself at (775) 785-1326 or meben@rsic.org.

Sincerely,

Michon R. Eben
THPO

cc: Doug Maloy, Regional Transportation Commission
Jim Clark, Jacobs Engineering
Cliff Creger, NDOT
Sabra Young, NDOT
Ed Stoner, WCRM
Dear Ms. Palmer:

As you know, the Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is proposing a project to improve traffic flow along the Pyramid Highway from Queen Way to Calle de la Plata Drive, in Washoe County. The project also includes a connector route from US 395 to the Pyramid Highway (SR 445) through the Sun Valley neighborhood in the northwestern portion of the Reno metro area. We previously consulted with you regarding the Area of Potential Effect (APE) and eligibility and effects to historic architectural resources identified in the study area, which include the Sierra Vista Ranch Historic District, the Trosi Family/Kiley Ranch Historic District, the Iratcabal Farm Historic District, and the Prosser Valley Ditch.

The purpose of this letter is to provide information about the identification of the Preferred Alternative, design changes that occurred after the Draft EIS was issued and results of the archaeological inventory that was conducted in late 2014/early 2015. It also provides FHWA’s eligibility and effect determinations for archaeological resources identified in the inventory, and requests your concurrence on these determinations. For details about methods used and archaeological sites evaluated during the inventory, please refer to the enclosed report entitled, *A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connector Project in Washoe County, Nevada.* (Western Cultural Resource Management [WCRM], 2015).

The Draft Environmental Impact Statement (Draft EIS) was issued in August 2013, which evaluated a No-Action Alternative and four build alternatives to meet the purpose and need of the Pyramid Highway/US 395 Connector project.
Design Changes since the Draft EIS and Identified Preferred Alternative

Build Alternative 3 was identified in early 2014 as the Preferred Alternative after the Draft EIS comment period concluded. The design of Alternative 3 was then modified based on the updated traffic analysis that was conducted later in 2014 for the Final EIS that is currently being prepared, resulting in a reduced project footprint. This modified alternative is referred to as “Revised Alternative 3,” and is shown on Figure 1. Under Revised Alternative 3 (Preferred Alternative), Pyramid Highway would be constructed as a limited-access arterial from Calle de la Plata south to the US 395 Connector directional interchange located between Golden View and Kiley Parkway. From that point, Pyramid Highway would be constructed as an arterial south to Queen Way. No frontage roads are proposed. A new grade-separated diamond interchange would be built at Highland Ranch Parkway/Sparks Boulevard, with Pyramid Highway crossing over Sparks Boulevard. No other grade-separated interchanges are proposed along Pyramid Highway. The US 395 Connector would veer southwest on a ridge alignment, and Disc Drive would be extended west to tie into the new US 395 Connector. The US 395 Connector would include a southern crossing of Sun Valley Boulevard south of Rampion Way. Revised Alternative 3 would include construction of an interchange west of Sun Valley Boulevard and modifications to the existing US 395/Parr Boulevard interchange.

Preliminary Archaeological Survey - 2012

A preliminary “walkover” archaeological survey was conducted in 2012 of the four build alternative footprints to identify any potential archeological resources to be considered as the EIS process moved forward and in the selection of a preferred alternative. The survey consisted of a file and literature search and walkover pedestrian survey. It identified approximately 100 sites with refuse scatters/dumps, two-track road systems, prospect pits/trenches, mining complexes, and ditches. On preliminary review, the nature of these sites likely made them important for what could be learned from data recovery, if they were found to be eligible after site recordation. These sites were expected to have minimal value for preservation in place because they do not embody other values besides data and are not considered sites of transcendent importance to archaeology.

Archaeological Inventory - 2014/2015

A Class III intensive pedestrian archaeological inventory was conducted in late 2014/early 2015 of the Archaeological APE, and is documented in the enclosed report entitled, A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada. (Western Cultural Resource Management [WCRM], 2015). The Archaeological APE includes the Revised Alternative 3 (Preferred Alternative) footprint and a 100-foot-wide buffer on each side of the construction footprint to encompass direct effects from ground-disturbing activities and any applicable indirect effects. The file search conducted on the Reno-Sparks Indian Colony parcel located at Pyramid Highway and Eagle Canyon Drive revealed that no previously recorded sites have been identified on the site. Because the identified Preferred Alternative (Revised Alternative 3) would avoid direct impacts to the RSIC parcel, further investigation of the parcel as part of the archaeological inventory was deemed unnecessary.
The inventory resulted in the documentation of 62 previously unrecorded archaeological sites and 40 isolated finds. In addition, an attempt was made to revisit 21 previously recorded sites. Of the newly recorded sites, 45 are historic, 2 are prehistoric and 15 have both historic and prehistoric components. Of the previously recorded sites, six have been destroyed by development unrelated to this project and no longer exist; one site has been destroyed with the exception of a single isolated artifact, and three are isolated artifacts that could not be relocated. The 11 remaining previously recorded sites were revisited and reevaluated for significance to the National Register of Historic Places (NRHP). Of the 21 previously recorded sites, 17 are historic, 2 are prehistoric, and 2 are multicomponent.

Of the 21 previously recorded sites in the project area, four are isolated artifacts and are categorically Not Eligible for the NRHP. Six sites no longer exist; six sites have been determined Not Eligible for the NRHP; four sites have been recommended Not Eligible for the NRHP; and one site has been determined Eligible for the NRHP under Criteria A and B (Prosser Valley Ditch, Site #26Wa6134).

Of the 62 newly recorded sites, 59 are recommended Not Eligible for the NRHP under any criteria, and three of the newly documented sites are recommended Eligible for the NRHP under Criterion D (Site #s 26Wa9822, 26Wa9841, and 26Wa9856).

A finding of Adverse Effect is recommended for Site #26Wa6134 (Prosser Valley Ditch) because it would be altered by the Preferred Alternative (Revised Alternative 3). Non-data recovery treatments are recommended for this site.

The Study team evaluated the Preferred Alternative (Revised Alternative 3) alignment to determine if impacts to the three sites eligible for the NRHP under Criterion D (Sites 26Wa9822, 26Wa9841, and 26Wa9856) could be avoided or minimized. It was found that moving the Preferred Alternative alignment to avoid or minimize impacts to two of the sites (Sites 26Wa9822 and 26Wa9841) is not feasible or practical. Due to the topographic conditions, any alignment shift would greatly increase earthwork and costs. Therefore, the Preferred Alternative will result in an Adverse Effect to those two sites (Site #s 26Wa9822 and 26Wa9841), and a treatment plan will be developed as stipulated in the Programmatic Agreement. For the third site eligible for the NRHP under Criterion D (Site #26Wa9856), the design team confirmed that impacts to the site can be avoided by minor design modifications, such as slightly steepening the slope. Therefore, FHWA recommends that the Preferred Alternative will result in No Historic Properties Affected for Site #26Wa9856.

Previously recorded sites and newly recorded sites that are not recommended Eligible for the NRHP and their effect recommendations are summarized in Table A, and those that are recommended Eligible for the NRHP and their effect recommendations are summarized in Table B.
<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/ Component</th>
<th>Site Type</th>
<th>Eligibility Determination/ Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
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<td>Building Vestige</td>
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<td>No Further Work</td>
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<td>Site Temporal Affiliation/Component</td>
<td>Site Type</td>
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<td>CrNV-03-9628</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Mining Complex</td>
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<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<tr>
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<td>26Wa9794</td>
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<td>State #</td>
<td>BLM#</td>
<td>Site Temporal Affiliation/ Component</td>
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<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
</tbody>
</table>
### Table A. Sites Not Eligible for the NRHP

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Determination/Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa9839</td>
<td></td>
<td>Historic</td>
<td>Mining Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9842</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospecting Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9847</td>
<td>N/A</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9848</td>
<td>N/A</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9849</td>
<td>N/A</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9850</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9851</td>
<td>N/A</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9852</td>
<td>N/A</td>
<td>Historic</td>
<td>Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9853</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9854</td>
<td>N/A</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9855</td>
<td>N/A</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9857</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9861</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9862</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
</tbody>
</table>

Source: WCRM, 2015

### Table B. Recommended/Determined Eligible Sites

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Rec.</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Previously Recorded</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>26Wa6134</td>
<td>CrNV-31-4843</td>
<td>Historic</td>
<td>Irrigation Ditch</td>
<td>Determined Eligible under Criteria A and B</td>
<td>Adverse Effect; Segment C will be directly impacted by the project</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td>Newly Recorded Sites</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26Wa9822</td>
<td>CrNV-03-9665</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic – Not Eligible</td>
<td>Adverse Effect; Site is located within the project disturbance footprint</td>
<td>Mitigate Adverse Effects</td>
</tr>
</tbody>
</table>
Table B. Recommended/Determined Eligible Sites

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<thead>
<tr>
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<th>Eligibility Rec.</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa9841</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic - Not Eligible</td>
<td>Adverse Effect; Site is located within the project disturbance footprint</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td>26Wa9856</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic - Not Eligible</td>
<td>No Historic Properties Affected because site can be avoided through minor design modifications</td>
<td>No further work</td>
</tr>
</tbody>
</table>

Source: WCRM, 2015

Summary

Historic Architectural Resources: Through previous Section 106 consultation, it was determined, and you have concurred, that there are four NRHP eligible historic architectural resources within the project's APE. Those resources and effect determinations are listed below:

- Sierra Vista Ranch Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Trosi Family/Kiley Ranch Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Irratcabal Farm Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Prosser Valley Ditch Segment C: Eligible under Criteria A and B. Recommended effect: Adverse Effect

Archaeological Resources: FHWA is recommending the following eligibility and effect determinations for archaeological resources identified within the Preferred Alternative footprint:

- Site #26Wa9822: Eligible under Criterion D. Recommended effect: Adverse Effect
- Site #26Wa9841: Eligible under Criterion D. Recommended effect: Adverse Effect
- Site #26Wa9856: Eligible under Criterion D. Recommended effect: No Historic Properties Affected

Section 4(f) Exception (23 CFR 774.13[b])

Based on the foregoing information and findings in the enclosed report, FHWA has concluded that Site #26Wa9822, Site #26Wa9841, and Site #26Wa9856 are important chiefly because of what can be learned by data recovery and have minimal value for preservation in place; therefore, section 4(f) evaluation is not required.

Based on the above information and enclosed report, we request your concurrence on the eligibility determinations as stated in Tables A and B, and the effect determination of adverse for the project level effect and the individual determination of effect for sites 26Wa9822, 26Wa9841, and 26Wa9856 as stated above.
If you have any questions please contact Cliff Creger of NDOT at 775-888-7666 or myself at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures:

Figure 1: Revised Alternative 3 (Preferred Alternative)
*A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada.* (Western Cultural Resource Management [WCRM], 2015)

cc: Vinton Hawley, Pyramid Lake Paiute Tribe
Arlan Melendez, Reno-Sparks Indian Colony
Neil Mortimer, Washoe Tribe of Nevada and California

ec: C. Cliff Creger, NDOT
C. Young, NDOT
E. Dickey, NDOT
Doug Maloy, RTC
Jim Clarke, Jacobs
Figure 1. Revised Alternative 3 (Preferred Alternative)
Ms. Rachel Crews  
Archaeologist  
Carson City Field Office  
Bureau of Land Management  
5665 Morgan Mill Road  
Carson City, Nevada 89701

Subject: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada  
EA #: 73390 & 73391; NDOT #: WA11-009; FHWA #: DE-0191(065) & DE-019(067);  
SHPO Undertaking #: 2010-0884; SHPO Report #: 8041

Dear Ms. Crews:

As you know, the Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is proposing a project to improve traffic flow along the Pyramid Highway from Queen Way to Calle de la Plata Drive, in Washoe County. The project also includes a connector route from US 395 to the Pyramid Highway (SR 445) through the Sun Valley neighborhood in the northwestern portion of the Reno metro area. We previously consulted with you regarding the Area of Potential Effect (APE) and eligibility and effects to historic architectural resources identified in the study area, which include the Sierra Vista Ranch Historic District, the Trosi Family/Kiley Ranch Historic District, the Iratcabal Farm Historic District, and the Prosser Valley Ditch.

The purpose of this letter is to provide information about the identification of the Preferred Alternative, design changes that occurred after the Draft EIS was issued and results of the archaeological inventory that was conducted in late 2014/early 2015. It also provides FHWA’s eligibility and effect determinations for archaeological resources identified in the inventory, and requests your concurrence on these determinations. For details about methods used and archaeological sites evaluated during the inventory, please refer to the enclosed report entitled, *A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada.* (Western Cultural Resource Management [WCRM], 2015).
The Draft Environmental Impact Statement (Draft EIS) was issued in August 2013, which evaluated a No-Action Alternative and four build alternatives to meet the purpose and need of the Pyramid Highway/US 395 Connector project.

**Design Changes since the Draft EIS and Identified Preferred Alternative**

Build Alternative 3 was identified in early 2014 as the Preferred Alternative after the Draft EIS comment period concluded. The design of Alternative 3 was then modified based on the updated traffic analysis that was conducted later in 2014 for the Final EIS that is currently being prepared, resulting in a reduced project footprint. This modified alternative is referred to as “Revised Alternative 3,” and is shown on Figure 1. Under Revised Alternative 3 (Preferred Alternative), Pyramid Highway would be constructed as a limited-access arterial from Calle de la Plata south to the US 395 Connector directional interchange located between Golden View and Kiley Parkway. From that point, Pyramid Highway would be constructed as an arterial south to Queen Way. No frontage roads are proposed. A new grade-separated diamond interchange would be built at Highland Ranch Parkway/Sparks Boulevard, with Pyramid Highway crossing over Sparks Boulevard. No other grade-separated interchanges are proposed along Pyramid Highway. The US 395 Connector would veer southwest on a ridge alignment, and Disc Drive would be extended west to tie into the new US 395 Connector. The US 395 Connector would include a southern crossing of Sun Valley Boulevard south of Rampion Way. Revised Alternative 3 would include construction of an interchange west of Sun Valley Boulevard and modifications to the existing US 395/Parr Boulevard interchange.

**Preliminary Archaeological Survey - 2012**

A preliminary “walkover” archaeological survey was conducted in 2012 of the four build alternative footprints to identify any potential archeological resources to be considered as the EIS process moved forward and in the selection of a preferred alternative. The survey consisted of a file and literature search and walkover pedestrian survey. It identified approximately 100 sites with refuse scatters/dumps, two-track road systems, prospect pits/trenches, mining complexes, and ditches. On preliminary review, the nature of these sites likely made them important for what could be learned from data recovery, if they were found to be eligible after site recordation. These sites were expected to have minimal value for preservation in place because they do not embody other values besides data and are not considered sites of transcendent importance to archaeology.

**Archaeological Inventory – 2014/2015**

A Class III intensive pedestrian archaeological inventory was conducted in late 2014/early 2015 of the Archaeological APE, and is documented in the enclosed report entitled, A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada. (Western Cultural Resource Management [WCRM], 2015). The Archaeological APE includes the Revised Alternative 3 (Preferred Alternative) footprint and a 100-foot-wide buffer on each side of the construction footprint to encompass direct effects from ground-disturbing activities and any applicable indirect effects. The file search conducted on the Reno-Sparks Indian Colony parcel located at Pyramid Highway and Eagle Canyon Drive revealed that no previously recorded sites have been identified on the site. Because the identified Preferred Alternative (Revised Alternative 3) would avoid direct impacts to the RSIC parcel,
further investigation of the parcel as part of the archaeological inventory was deemed unnecessary.

The inventory resulted in the documentation of 62 previously unrecorded archaeological sites and 40 isolated finds. In addition, an attempt was made to revisit 21 previously recorded sites. Of the newly recorded sites, 45 are historic, 2 are prehistoric and 15 have both historic and prehistoric components. Of the previously recorded sites, six have been destroyed by development unrelated to this project and no longer exist; one site has been destroyed with the exception of a single isolated artifact, and three are isolated artifacts that could not be relocated. The 11 remaining previously recorded sites were revisited and reevaluated for significance to the National Register of Historic Places (NRHP). Of the 21 previously recorded sites, 17 are historic, 2 are prehistoric, and 2 are multicomponent.

Of the 21 previously recorded sites in the project area, four are isolated artifacts and are categorically Not Eligible for the NRHP. Six sites no longer exist; six sites have been determined Not Eligible for the NRHP; four sites have been recommended Not Eligible for the NRHP; and one site has been determined Eligible for the NRHP under Criteria A and B (Prosper Valley Ditch, Site #26Wa6134).

Of the 62 newly recorded sites, 59 are recommended Not Eligible for the NRHP under any criteria, and three of the newly documented sites are recommended Eligible for the NRHP under Criterion D (Site #s 26Wa9822, 26Wa9841, and 26Wa9856).

A finding of Adverse Effect is recommended for Site #26Wa6134 (Prosper Valley Ditch) because it would be altered by the Preferred Alternative (Revised Alternative 3). Non-data recovery treatments are recommended for this site.

The Study team evaluated the Preferred Alternative (Revised Alternative 3) alignment to determine if impacts to the three sites eligible for the NRHP under Criterion D (Sites 26Wa9822, 26Wa9841, and 26Wa9856) could be avoided or minimized. It was found that moving the Preferred Alternative alignment to avoid or minimize impacts to two of the sites (Sites 26Wa9822 and 26Wa9841) is not feasible or practical. Due to the topographic conditions, any alignment shift would greatly increase earthwork and costs. Therefore, the Preferred Alternative will result in an Adverse Effect to those two sites (Site #s 26Wa9822 and 26Wa9841), and a treatment plan will be developed as stipulated in the Programmatic Agreement. For the third site eligible for the NRHP under Criterion D (Site #26Wa9856), the design team confirmed that impacts to the site can be avoided by minor design modifications, such as slightly steepening the slope. Therefore, FHWA recommends that the Preferred Alternative will result in No Historic Properties Affected for Site #26Wa9856.

Previously recorded sites and newly recorded sites that are not recommended Eligible for the NRHP and their effect recommendations are summarized in Table A, and those that are recommended Eligible for the NRHP and their effect recommendations are summarized in Table B.
<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Determination/Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Previously Recorded Sites</td>
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</tr>
<tr>
<td>26Wa3259</td>
<td></td>
<td>Historic Building Vestige</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>26Wa3408</td>
<td>CrNV-31-3801</td>
<td>Historic Trash Scatter</td>
<td>NA, site no longer exists</td>
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<td>NA</td>
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<tr>
<td>26Wa5398</td>
<td></td>
<td>Historic Prospects and Modern Trash Midden</td>
<td>NA, site no longer exists</td>
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<td>NA</td>
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<tr>
<td>26Wa5400</td>
<td></td>
<td>Historic Prospect Complex</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa5403</td>
<td></td>
<td>Prehistoric Prehistoric Isolated Artifact</td>
<td>NA; isolates are categorically not eligible to the NRHP</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>26Wa5404</td>
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<td>Historic Isolated Artifact</td>
<td>NA; isolates are categorically not eligible to the NRHP</td>
<td>NA</td>
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<tr>
<td>26Wa5405</td>
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<td>Historic Isolated Artifact</td>
<td>NA; isolates are categorically not eligible to the NRHP</td>
<td>NA</td>
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<tr>
<td>26Wa5435</td>
<td>Prehistoric</td>
<td>Simple Lithic Assemblage</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
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<tr>
<td>26Wa5673</td>
<td></td>
<td>Historic Prospect Complex</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
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<tr>
<td>26Wa5674</td>
<td></td>
<td>Historic Prospect Complex</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa5666</td>
<td></td>
<td>Historic Refuse Dump</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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</tr>
<tr>
<td>26Wa5777</td>
<td>CrNV-03-5508</td>
<td>Historic Transportation - Road</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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</tr>
<tr>
<td>26Wa7122</td>
<td></td>
<td>Historic Farming or Ranching Activity Site</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
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<tr>
<td>26Wa7123</td>
<td></td>
<td>Historic Prospect Complex</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa8267</td>
<td>CrNV-03-5834</td>
<td>Historic Debris Scatter</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa8240</td>
<td>CrNV-03-5795</td>
<td>Historic Prospect Complex</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa8241</td>
<td>CrNV-03-5795</td>
<td>Historic Prospect Complex</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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</tr>
<tr>
<td>26Wa8243</td>
<td></td>
<td>Historic Refuse Dump</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa8245</td>
<td></td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Simple Lithic Assemblage; Debris Scatter</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa8246</td>
<td></td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Simple Lithic Assemblage; Historic Isolated Artifact</td>
<td>NA; site no longer exists except for one isolated artifact which is categorically not eligible to the NRHP</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Newly Recorded Sites</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>26Wa9775</td>
<td>CrNV-03-9618</td>
<td>Prehistoric</td>
<td>Simple Lithic Assemblage</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
</tbody>
</table>
Table A. Sites Not Eligible for the NRHP

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<tr>
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<tbody>
<tr>
<td>26Wa9776</td>
<td>CrnV-03-9619</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Isolated Historic</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9777</td>
<td>CrnV-03-9620</td>
<td>Prospect Complex</td>
<td>Prehistoric Simple Food Processing Site; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9778</td>
<td>CrnV-03-9621</td>
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<td>Prehistoric Isolated Artifact; Prospect Complex</td>
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<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9784</td>
<td>CrnV-03-9627</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9785</td>
<td>CrnV-03-9628</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Mining Complex;</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9786</td>
<td>CrnV-03-9629</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9787</td>
<td>CrnV-03-9630</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9788</td>
<td>CrnV-03-9631</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9790</td>
<td>CrnV-03-9633</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9791</td>
<td>CrnV-03-9634</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9793</td>
<td>CrnV-03-9636</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9794</td>
<td>CrnV-03-9637</td>
<td>Prehistoric; Unknown/ Multicomponent</td>
<td>Prehistoric isolated artifact; Prospect complex and stacked rock feature of unknown age</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9795</td>
<td>CrnV-03-9638</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9796</td>
<td>CrnV-03-9639</td>
<td>Prehistoric; Historic/ Multicomponent</td>
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<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
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<td>26Wa9797</td>
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<td>Historic</td>
<td>Mining Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>State #</td>
<td>BLM#</td>
<td>Site Temporal Affiliation/Component</td>
<td>Site Type</td>
<td>Eligibility Determination/Recommendation</td>
<td>Recommendation of Effect</td>
<td>Management Recommendation</td>
</tr>
<tr>
<td>--------</td>
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</tr>
<tr>
<td>26Wa9798</td>
<td>CrNV-03-9641</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9799</td>
<td>CrNV-03-9642</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Mining Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
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<td>26Wa9800</td>
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<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
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<td>26Wa9801</td>
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<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9803</td>
<td>CrNV-03-9646</td>
<td>Historic</td>
<td>Prospecting Complex</td>
<td>Non-Significant/Not Eligible</td>
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<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9805</td>
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<td>Historic</td>
<td>Mining Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9806</td>
<td>CrNV-03-9649</td>
<td>Prehistoric</td>
<td>Simple Lithic Assemblage</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9808</td>
<td>CrNV-03-9651</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9809</td>
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<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
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<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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<td>26Wa9814</td>
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<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9818</td>
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<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9825</td>
<td>Historic</td>
<td>Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
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<tr>
<td>26Wa9826</td>
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<td>Mining Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
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<td>26Wa9827</td>
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<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<tr>
<td>26Wa9828</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9829</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9830</td>
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<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<tr>
<td>26Wa9831</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9832</td>
<td>Historic</td>
<td>Transportation – Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9833</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9834</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9836</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9837</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
</tbody>
</table>
Table A. Sites Not Eligible for the NRHP

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Determination/Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa9839</td>
<td></td>
<td>Historic</td>
<td>Mining Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9842</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospecting Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9847</td>
<td>N/A</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9848</td>
<td>N/A</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9849</td>
<td>N/A</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9850</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9851</td>
<td>N/A</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9852</td>
<td>N/A</td>
<td>Historic</td>
<td>Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9853</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9854</td>
<td>N/A</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9855</td>
<td>N/A</td>
<td>Historic</td>
<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9857</td>
<td></td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Simple Lithic Assemblage, Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9861</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9862</td>
<td>N/A</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
</tbody>
</table>

Source: WCRM, 2015

Table B. Recommended/Determined Eligible Sites

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Rec.</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa6134</td>
<td>CrNV-31-4843</td>
<td>Historic</td>
<td>Irrigation Ditch</td>
<td>Determined Eligible under Criteria A and B.</td>
<td>Adverse Effect; Segment C will be directly impacted by the project</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td>26Wa9822</td>
<td>CrNV-03-9665</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic - Not Eligible</td>
<td>Adverse Effect; Site is located within the project disturbance footprint</td>
<td>Mitigate Adverse Effects</td>
</tr>
</tbody>
</table>
### Table B. Recommended/Determined Eligible Sites

<table>
<thead>
<tr>
<th>State#</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Rec.</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa9841</td>
<td>N/A</td>
<td>Prehistoric; Historic/Multicomponent</td>
<td>Quany/Intensive Lithic Reduction Site; possible Historic Isolated Feature</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic - Not Eligible</td>
<td>Adverse Effect; Site is located within the project disturbance footprint</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td>26Wa9856</td>
<td>N/A</td>
<td>Prehistoric; Historic/Multicomponent</td>
<td>Quany/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic - Not Eligible</td>
<td>No Historic Properties Affected because site can be avoided through minor design modifications</td>
<td>No further work</td>
</tr>
</tbody>
</table>

Source: WCRM, 2015

### Summary

**Historic Architectural Resources:** Through previous Section 106 consultation, it was determined, and you have concurred, that there are four NRHP eligible historic architectural resources within the project’s APE. Those resources and effect determinations are listed below:

- Sierra Vista Ranch Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Trosi Family/Kiley Ranch Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Iratacabal Farm Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Prosser Valley Ditch Segment C: Eligible under Criteria A and B. Recommended effect: Adverse Effect

**Archaeological Resources:** FHWA is recommending the following eligibility and effect determinations for archaeological resources identified within the Preferred Alternative footprint:

- Site #26Wa9822: Eligible under Criterion D. Recommended effect: Adverse Effect
- Site #26Wa9841: Eligible under Criterion D. Recommended effect: Adverse Effect
- Site #26Wa9856: Eligible under Criterion D. Recommended effect: No Historic Properties Affected

**Section 4(f) Exception (23 CFR 774.13[b])**

Based on the foregoing information and findings in the enclosed report, FHWA has concluded that Site #26Wa9822, Site #26Wa9841, and Site #26Wa9856 are important chiefly because of what can be learned by data recovery and have minimal value for preservation in place; therefore, section 4 (f) evaluation is not required.

Based on the above information and enclosed report, we request your concurrence on the eligibility determinations as stated in Tables A and B, and the effect determination of adverse for the project level effect and the individual determination of effect for sites 26Wa9822, 26Wa9841, and 26Wa9856 as stated above.
If you have any questions please contact Cliff Creger of NDOT at 775-888-7666 or myself at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures:

Figure 1: Revised Alternative 3 (Preferred Alternative)
A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada. (Western Cultural Resource Management [WCRM], 2015)

cc: V. Hawley, Pyramid Lake Indian Tribe
   A. Melendez, Reno-Sparks Indian Colony
   N. Mortimer, Washoe Tribe of Nevada and California

ec: C. Cliff Creger, NDOT
   C. Young, NDOT
   E. Dickey, NDOT
   Doug Maloy, RTC
   Jim Clarke, Jacobs
Figure 1. Revised Alternative 3 (Preferred Alternative)
April 19, 2017

Ms. Rebecca Palmer
State Historic Preservation Officer
Nevada State Historic Preservation Office
901 S. Stewart Street, Suite 5004
Carson City, Nevada 89701-4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Clarify the Authority under which the Undertaking Will Proceed for Section 106 Compliance, and Request Concurrence on Area of Potential Effects for Historic Architectural and Archaeological Resources
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

As you know, the Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is preparing an Environmental Impact Statement (EIS) to evaluate effects from proposed improvements along Pyramid Highway from Queen Way to Calle de la Plata Drive, in Washoe County to improve the area’s traffic flow. The project also proposes to construct a new connection between US 395 and Pyramid Highway (SR 445) through the Sun Valley area in the northwestern portion of the Reno metro area.

We initiated consultation with the State Historic Preservation Officer (SHPO) for this undertaking in February 2009, and we have continued consultation with the SHPO regarding establishment of the area of potential effects (APEs), and eligibility and effect determinations for historic architectural and archaeological resources. We have also coordinated with your office in the development of a project-specific Programmatic Agreement (PA). Recently, we met with your staff on March 28, 2017 to provide an update on the project and outline a path for completion of the Section 106 process.

The purpose of this letter is to (1) clarify under which authority FHWA is proceeding with Section 106 consultation for the undertaking, and (2) conclude APE consultation for the undertaking. To that end, the following information is provided:

1. Address SHPO’s outstanding questions concerning:
   a. Under which authority the undertaking will proceed to comply with Section 106.
b. Whether the historic architecture direct and indirect APE accounts for the potential visual, audible, atmospheric, and cumulative effects of the undertaking.

2. Summarize the historic architecture direct and indirect APE and the archaeological APE established for the project and request SHPO’s formal concurrence.

Authority under which the Undertaking Will Proceed
In your October 14, 2015 letter, you asked FHWA to clarify under which authority the undertaking will proceed to comply with Section 106 – whether to finalize and follow the draft project-specific PA, to utilize the existing statewide Section 106 PA, or just follow standard Section 106 requirements as outlined in the Advisory Council on Historic Preservation’s regulations in 36 CFR 800. Based on the discussion in our March 28, 2017 meeting with the SHPO and NDOT, FHWA has decided that the undertaking will proceed under the statewide Section 106 PA titled, Programmatic Agreement among the Federal Highway Administration, the Nevada Department of Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding implementation of Federal-Aid Transportation Projects in the State of Nevada (2014). This decision is 1) based on the fact that the project-specific PA has not been fully executed, and the SHPO had additional comments on the PA that would require additional changes to the PA and vetting with PA signatories, which would have schedule implications; 2) based on where we are in the Section 106 process for this project since many of the deliverables and efficiencies outlined in the project-specific PA have been completed; and 3) based on the fact that the statewide PA addresses the Section 106 consultation needs of this project because it captures all parties that are pertinent to this undertaking (including the Bureau of Land Management [BLM] and the U.S. Army Corps of Engineers [USACE]), outlines responsibilities, etc., and largely follows the regulations (e.g., it does not establish expedited review processes or additional requirements).

Historic Architecture APE Descriptions
In your letters dated October 11, 2011, March 28, 2012, and August 31, 2012, you discussed the historic architecture APE; summarized the number of parcels included in the architectural APE; and noted that, had a buffering system been used to document the APE instead of a parcel system, perhaps fewer acres or properties would have been surveyed, and the APE would have been adequate for the scale and nature of the undertaking (36 CFR 800.16 [d]). In your October 11, 2011 letter, you also noted that, at that time, you concurred with the architectural APE. Your August 31, 2012 letter further noted the following concerns that are addressed in this letter. Your comments have been enumerated to aid in following the discussion below.

1. SHPO Comment #1: Discrepancies between FHWA’s September 8, 2011 letter and the Architectural Inventory Report (revised June 2012) regarding the undertaking’s effect on new development. FHWA’s letter indicated that the project is not expected to induce development that would exceed the visual APE range, while the report indicated that further residential and commercial development on lands near and around the historic properties is anticipated because of increased accessibility offered by the highway improvements.
2. **SHPO Comment #2**: The Architectural Inventory Report (revised June 2012) states that there are other buildings, including a barn that were visible from the road and appear to be historically associated with the Trosi/Kiley Ranch, but are today outside of the parcel.

3. **SHPO Comment #3**: The Architectural Inventory Report (revised June 2012) states that the anticipated view shed alterations at the Trosi Family/Kiley Ranch will involve the introduction of a new intersection and transition from grade level to elevated highway west and northwest of the historic district (page 64).

4. **SHPO Comment #4**: Based on the above noted information, there appears to be additional, visible resources that were not included in the APE, given the proposed project description. SHPO will require a reevaluation of the APE for visual, audible, atmospheric, and cumulative effects.

5. **SHPO Comment #5**: In your October 14, 2015 letter to FHWA, you noted that both FHWA letters dated September 9, 2015 and September 28, 2015 made additional modifications to the project description and design, and that per the September 28, 2015 FHWA letter, these modifications have the potential to alter effects to historic properties.

Responses to your concerns are provided below. First, as requested by the SHPO in our March 28, 2017 meeting, a thorough description of the undertaking is attached to this letter (Attachment A) to inform your review of these responses and your review of the historic architecture direct and indirect APE established for the undertaking. The undertaking description summarizes design changes made to the build alternatives between 2015 and early 2017, and describes and illustrates each of the four build alternatives (referred to as Arterial Alternatives) currently being evaluated in the Final EIS. Additionally, the attached maps illustrate the study area, the historic architecture direct and indirect APEs, and the location of the National Register of Historic Places (NRHP)-eligible historic districts discussed in this letter.

Regarding discrepancies noted under SHPO Comment #1 above, FHWA apologizes for the confusion. To clarify, while the Architectural Inventory Report did indicate that the project would result in further land development because of increased accessibility offered by the project, FHWA has a different opinion than that provided by the cultural resources subconsultant. FHWA has determined that the project is not expected to induce development that would expand the APE beyond its current boundaries for the reasons stated in our September 8, 2011 letter, which are summarized here: This project includes two types of roadway improvements – improvements to existing roads and construction of a new road (the US 395 Connector). The types of improvements proposed on existing roads include widening portions of Pyramid Highway and Disc Drive, adding short segments of auxiliary lanes along US 395 at the US 395/Parr Boulevard interchange, realigning Raggio Parkway and Dandini Boulevard, short extensions of West 1st and 2nd Streets in Sun Valley, minor improvements along Sun Valley Boulevard to accommodate the US 395 Connector, and adding bicycle and pedestrian facilities along Pyramid Highway, Disc Drive, and other roads in the vicinity of the US 395 Connector. Improvements also include improving Pyramid Highway as an access-controlled arterial, which includes improvements such as construction of a raised median to limit left-turn access, and modifying existing Pyramid Highway access points to right-in/right-out or eliminating access to Pyramid by terminating current access roads at Pyramid with cul-de-sacs. These proposed
improvements are compatible with surrounding zoning and future land uses. Future growth and
development would continue to be market driven and occur in accordance with local land use
restrictions regardless of whether this undertaking is implemented. Further, the new road
construction would generally occur on steeper slopes on BLM-owned property and/or zoned
open space. These areas are not likely to be developed in the reasonably foreseeable future due to
BLM and zoning development restrictions, as well as the costs associated with developing lands
on steep slopes, especially when commercial space is available along roads that would be
improved by the project.

Regarding SHPO Comments #2 through #4, it is FHWA’s understanding that the “other
buildings” referenced in the Architectural Inventory Report include those located east of the
Trosi/Kiley Ranch Historic District (SHPO Resource Number D94). FHWA has determined that
the proposed improvements along Pyramid Highway, which include a grade-separated
interchange at Pyramid Highway/Sparks Boulevard northwest of the Trosi/Kiley Ranch Historic
District, would be visually indistinguishable from the northwestern-most boundary of the
Trosi/Kiley Ranch Historic District (refer to historic architecture APE discussion later in this
letter for more information). Regarding the statement in the Architectural Inventory Report that
the view shed alterations at the ranch “will involve the introduction of a new intersection and
transition from grade level to elevated highway west and northwest of the historic district,” it is
correct that a grade-separated interchange at Pyramid Highway/Sparks Boulevard located
northwest of the ranch is still proposed, but grade-separated interchanges are no longer proposed
north of Sparks Boulevard. In that portion of the project, at-grade improvements are proposed,
including road widening, access changes, and signalized intersections that would not be visible
from the ranch due to its distance from the proposed improvements and area topography. Based
on the above, proposed improvements would be visually indistinguishable to buildings located
east of the ranch. Therefore, the historic architecture direct and indirect APE boundary located
at the eastern edge of the Trosi/Kiley Ranch Historic District adequately encompasses the visual
effects of the undertaking. If upon further evaluation additional outbuildings were to be included
in this historic district, or if the boundaries of the district were to extend farther to the north or
east, such changes would not alter the APE, the eligibility, or the effect of the project on this
property.

In response to SHPO comment #5, please note that design changes made to the build alternatives
have resulted in a reduced project footprint overall, and eliminated grade-separated interchanges
previously proposed on Pyramid Highway, north of Sparks Boulevard. The design changes have
essentially resulted in a narrowing/scaling down of the project, thus reducing visual impacts
overall. As such, effects to cultural resources have changed as a result of design changes – the
effects have been reduced. For example, due to design changes, the project would impact fewer
linear feet of the Prosser Valley Ditch (WA5234, WA6134 and SHPO Resource Number S820),
and the previously proposed grade-separated interchange at Pyramid Highway/Dolores Drive
west of the Sierra Vista Ranch Historic District (SHPO Resource Number D93) is no longer
proposed, reducing visual effects to that historic resource.
Reevaluation of the Historic Architecture Direct and Indirect APE

To address the SHPO's concerns regarding the historic architecture direct and indirect APE, FHWA reevaluated that APE to confirm that it encompasses visual, audible, atmospheric, and cumulative effects of the undertaking.

Regarding your overall concerns about the historic architecture direct and indirect APE, as a result of design changes made after the 2013 Draft EIS, the Arterial Alternatives would have reduced visual and audible effects compared to the Build Alternatives evaluated in the Draft EIS. Also, all of the Arterial Alternatives maintain the same alignment as the Draft EIS build alternatives.

The visual effects of the undertaking were the main driver for determining the extent of the parcel-based direct and indirect historic architecture APE because visual impacts generally extend farther than auditory or atmospheric impacts. The air quality analysis conducted for the EIS found that none of the arterial alternatives would cause an exceedance of the U.S. National Ambient Air Quality Standards (NAAQS) established by the U.S. Environmental Protection Agency under authority of the Clean Air Act (42 U.S.C. 7401 et seq.) that apply for outdoor air throughout the country. Further, improved transportation operations under the arterial alternatives would result in improved air quality compared to the No Action Alternative. Therefore, this APE reevaluation focuses on visual effects of the undertaking to verify the appropriateness of the historic architecture direct and indirect APE boundary. The following discussion compares the detailed project description of the current undertaking (see Attachment A) against known historic properties to verify that the parcel-based direct and indirect APE limits are appropriately established and to illustrate the reduction in impacts to these resources.

Between Sparks Boulevard and Calle de la Plata, previously-proposed grade-separated interchanges on Pyramid Highway at Eagle Canyon Drive/La Posada Drive and Dolores Drive are no longer proposed (refer to Figure 1 in Attachment A). In this segment of Pyramid Highway, at-grade improvements include road widening, access changes at cross-streets, the addition of bicycle and pedestrian facilities, and traffic signal controls at the following intersections where no traffic signals currently exist:

- Calle de la Plata: Full movement signalized intersection with reconfigured lanes.
- Egyptian Drive/Sunset Springs Lane: Full movement signalized intersection with reconfigured lanes
- Dolores Drive: Full movement, signalized intersection with reconfigured lanes.

Traffic signal poles and roadway light poles would introduce new vertical visual elements at the above-listed intersections, and introduce new sources of light during nighttime hours. Vertical elements that currently exist along Pyramid Highway include commercial and residential developments, as well as power poles, power lines, and roadway signage along the road. These vertical elements located along Pyramid Highway and farther distant from the roadway currently produce light impacts during nighttime hours. Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.
Sierra Vista Ranch Historic District: All Arterial Alternatives would result in reduced visual effects to the Sierra Vista Ranch Historic District due to the elimination of the previously proposed grade-separated intersection at Pyramid Highway and Dolores Drive. Instead, the intersection would remain at-grade and traffic signals with street lights would be added. The proposed feeder road running southeast from the new intersection would still be provided under the design changes made. Before design changes were made, the proposed improvements would have introduced new visual elements into the setting of the site. However, these visual and audible effects were determined to be avoided by modifying the design to include the planting of one or more lines of trees along the western boundary of the district to form a living visual barrier between the district and Pyramid Highway. The recent design changes include elimination of the grade-separated Pyramid/Dolores interchange and installing traffic signals. Based on their height and thinness, street lights would not be visually distinguishable beyond approximately 800 feet. The northwestern-most boundary of the Sierra Vista Ranch Historic District is located approximately 1,890 feet from the Dolores Drive/Pyramid intersection, which is well beyond the point where traffic signals and lighting would be visually distinguishable. Therefore, the indirect APE in this area is adequate.

Trosi Family/Kiley Ranch Historic District: All the Arterial Alternatives have Pyramid Highway crossing over Sparks Boulevard. Interchange entry and exit ramps would provide access between Pyramid Highway and Sparks Boulevard. The proposed Pyramid Highway bridge roadway surface is 25 feet above the Sparks Blvd roadway surface. This elevation represents the maximum roadway height over the existing ground at this location. The thickness of the bridge is 8 feet, allowing for the standard 16 feet of clearance. The elevation of Sparks Boulevard would remain at the existing grade. The edges of the bridge would be lined with a 42-inch-tall solid concrete railing, according to NDOT standard.

Lighting: NDOT typically uses Type 7 Poles for this type of interchange. The height of the pole is 32 feet 4 inches above the roadway surface. Three poles would be placed at each ramp gore for a total of 12 poles. Additional poles would be placed along Sparks Blvd and Highland Ranch Pkwy prior to the interchange intersections similar to what is present today. There would be no lights on the bridge itself and given the rural residential location, high mast lighting is not anticipated. The approximate heights of the light poles for the ramps at their proposed location above the existing ground would be as follows:

- Northbound off-ramp: 52 feet
- Northbound on-ramp: 50 feet
- Southbound off-ramp: 41 feet
- Southbound on-ramp: 43 feet

The heights given account for both the pole height and proposed roadway improvements and represent the tallest elements at the interchange.

Two traffic signals would be installed – one at each interchange intersection. Each of the signal poles would include a street light on the top. These poles would be similar in height to the Type 7 poles. The elevation of the signals and lights would be very similar to those at the existing Sparks Boulevard intersection.
**Signing**: The project would include signing in advance of the interchange. Overhead signs would be placed prior to the ramp exits. The tops of these signs would be approximately 25 feet above the roadway surface.

Below is a visual approximation of how the proposed Pyramid Highway/Sparks Boulevard grade-separated interchange would appear as viewed from the northwestern boundary of the Trosi/Kiley Ranch Historic District located approximately 800 feet southeast of the proposed interchange:
As shown in the visual simulation above, the interchange would be visually indistinguishable from the northwestern boundary of the ranch located approximately 800 feet southeast of the interchange. Therefore, the proposed interchange would be visually indistinguishable from the northernmost buildings within the district that are located approximately 1,165 away from the interchange. As such, the proposed interchange would be visually indistinguishable from areas east of the Trosi/Kiley Ranch Historic District as well.

Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.

**Iratacabal Farm Historic District:** Proposed improvements with the potential to result in visual effects to this district include widening along Disc Drive and construction of a Disc Drive/US 395 Connector interchange.

Below is the view from the northern portion of the district toward Disc Drive, located approximately 1,260 feet north of the district. As shown, Disc Drive is visually indistinguishable from the district. Therefore, the at-grade improvements proposed along Disc Drive would not be visible from the district:
Below is the view from the northern portion of the district toward the Pyramid Highway/Disc Drive intersection, located approximately 5,500 feet west-northwest of the district. As shown, the intersection is currently visually indistinguishable from the district. Based on the Pyramid/Sparks Boulevard grade-separated interchange visual simulation that illustrates that the interchange is visually indistinguishable from approximately 800 feet away, a grade-separated Pyramid Highway/Disc Drive interchange would be visually indistinguishable from the Iratcabal Farm Historic District located over one mile east of the proposed interchange.
Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.

**Summary of Historic Architecture and Archaeological APEs**

- The historic architecture direct APE includes the footprint for all arterial alternatives. The historic architecture indirect APE includes adjacent parcels and parcels that might be visually, audibly, or cumulatively impacted by the project. This parcel-based APE extends from the direct impact footprint in areas where above-grade improvements such as grade-separated interchanges are proposed that could potentially result in visual impacts. The indirect APE encompasses indirect effects, including potential visual, audible, atmospheric, and cumulative effects of the undertaking. The direct and indirect APEs are shown on the attached maps.

- The direct archaeological APE consists of the footprint of the identified Preferred Alternative plus a 100-foot buffer on both sides of the footprint to account for minor design changes that may occur during final design and temporary construction easements. The Preferred Alternative will be identified once the Final EIS updates are completed, which is anticipated to occur end of May or June 2017.

We request your concurrence with the archaeological APE described above, and the historic architecture direct and indirect APE described above and shown on the attached figures. This information has been forwarded concurrently to the following consulting parties for review:
Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California. We will notify you of any responses received from these groups.

If you have any questions please contact me at 775-888-7666.

Sincerely,

C. Cliff Creger
Chief Cultural Resources Program Manager

Enclosures:
Attachment A: Description of Undertaking
Attachment B: Map of Study Area, APE, and NRHP Eligible Historic Architecture Resources

cc: Abdelmoez Abdalla, FHWA
    Jin Zhen, FHWA
    Dale Wegner, FHWA
    Greg Novak, FHWA
    Pyramid Lake Paiute Tribe
    Reno-Sparks Indian Colony
    Washoe Tribe of Nevada and California
    Doug Maloy, RTC
    Jim Clarke, Jacobs
Historic Architecture Indirect APE and NRHP Eligible Historic Architecture Resources within the APE
Attachment A – Description of Undertaking
Pyramid Highway/US 395 Connector: Description of Undertaking

This document summarizes project changes that occurred after the Draft Environmental Impact Statement (Draft EIS) was distributed in August 2013 that lead to the design changes made to the build alternatives that are being fully evaluated in Final EIS. The project changes include reductions in forecasted traffic as a result of updated traffic data that became available after the Draft EIS, and the build alternatives reevaluation and rescreening that was conducted and design changes made as a result of the reduced traffic forecasts. The most notable design changes made to the build alternatives after the Draft EIS was distributed include changing the proposed roadways from freeway-type facilities to arterial-type facilities, reducing the build alternative footprints in some areas, and eliminating some grade-separated interchanges previously proposed under the build alternatives evaluated in the Draft EIS. Under the design changes, all of the build alternatives follow the same alignments.

PROJECT CHANGES MADE AFTER THE AUGUST 2013 DRAFT EIS

Revised Traffic Forecasts

While the Preferred Alternative was being identified and vetted after reviewing and consideration of comments received on the Draft EIS, RTC was adopting a new regional traffic model. This new model used updated population and employment projections from a new Consensus Forecast from the Truckee Meadows Regional Planning Agency that replaced the Interim Consensus Forecast (ICF) used for the Draft EIS traffic analysis. In general, the population and employment in the region were forecasted to be lower, and the areas of population and employment growth changed to be more consolidated than the prior ICF estimates. As a result, the forecasted volumes from the updated travel demand models were also generally lower than the previously forecasted volumes documented in the Draft EIS.

The reduction in traffic forecasts was significant enough for the Study team to revisit the design of the build alternatives. It was found that the reduced traffic demand changed the type of highway facility needed to address the purpose and need of the project. The Study team concluded that an arterial facility in lieu of a freeway facility (which was included in the build alternatives evaluated in the Draft EIS) could provide adequate capacity for the projected traffic volumes. Because the design criteria for an arterial facility are different than those required for a freeway facility, the Study team modified the design criteria for the build alternatives to that of an arterial facility, including the cross-section width, design speed, access control, and acceptable grades. This effort resulted in a cumulative reduction in the footprint of the build (“freeway”) alternatives that were fully evaluated in the Draft EIS.

Design speeds for arterial facilities are typically lower than those associated with a freeway, allowing for a tighter geometric design. Therefore, the design speed for the “arterial” type build alternatives was modified. The build alternatives now include a design speed of 55 miles per hour (mph) for Pyramid Highway, 60 mph design speed for the US 395 Connector, and 45 mph design speed for the Disc Drive Extension. These slight reductions to the design speeds allowed for development of a narrower roadway, which would reduce impacts and costs.

A traffic analysis was then conducted for each intersection to confirm if grade-separated interchanges were still necessary. Under all revised build (“arterial”) alternatives, all previously proposed grade-separated interchanges along Pyramid Highway north of Sparks Boulevard were deemed unnecessary and were eliminated. All the arterial alternatives would still require grade-separated interchanges at: US 395, at or near Sun Valley Boulevard, and Highland Ranch...
Parkway/Sparks Boulevard. The revised off alignment and ridge alignment (Arterial Alternatives 1 and 3, respectively) each would require a directional interchange where they connect with Pyramid Highway. The revised on alignment (Arterial Alternatives 2 and 4) would require additional interchanges at Disc Drive, Los Altos Parkway, Golden View Drive, and Sparks Boulevard.

All previously proposed frontage roads along Pyramid Highway were also eliminated.

The following sections describe the four build alternatives (referred to as Arterial Alternatives) that were modified after the Draft EIS as a result of reduced traffic forecasts.

**Arterial Alternatives – Common Elements**

Each of the Arterial Alternatives would improve 7.7 miles of Pyramid Highway from Queen Way north to Calle de la Plata Drive through the communities of Sparks and Spanish Springs. The alternatives differ regarding alignments for the new east-west US 395 Connector, US 395 Connector interchange locations, and road cross-sections through parts of the Study Area.

In addition to road improvements, each Arterial Alternative includes bicycle and pedestrian facilities; increased transit services, including park-and-rides; and Intelligent Transportation Systems (ITS). ITS uses advanced applications of electronics and communications, such as enhanced traveler information and variable message signs, to improve traffic operations and increase roadway effectiveness. North of Sparks Boulevard, all Arterial Alternatives follow the same alignment along the existing Pyramid Highway. Figure 1 shows the elements common to all Arterial Alternatives.

**Roadway Improvements**

Each Arterial Alternative would include a new arterial facility and ancillary improvements from Pyramid Highway to US 395, through the Sun Valley area. Arterial improvements are designed to carry traffic directly to US 395 via the US 395 Connector rather than along the existing Pyramid Highway to McCarran Boulevard. Both the US 395 Connector and Pyramid Highway segments north to Calle de la Plata Drive would be constructed as a high speed, access controlled primary arterial highways with a combination of interchanges and at-grade intersections at certain major intersecting roadways. Note that the term “high speed” refers to a design speed of over 45 mph.

Arterial design elements along Pyramid Highway include installing a raised median island to separate directions of travel and limit left-turn access. The US 395 Connector includes an unpaved median, and barrier rail only at select locations where required to meet clear zone distances. Immediately east of US 395, all the arterial alternatives would include barrier rail on both the outside shoulders and in the median, mostly due to topographic constraints.

The existing US 395/Parr Boulevard service interchange would be reconstructed and reconfigured to accommodate a new directional system interchange for the US 395 Connector. Raggio Parkway, Dandini Boulevard, and Spectrum Drive would be realigned in this area to accommodate the interchange improvements and provide improved access to the DRI and TMCC campuses.
Each Arterial Alternative would have the following cross-sections:

- Four-lane arterial
  - Along Pyramid Highway between Calle de la Plata and Eagle Canyon Drive/La Posada Drive.
• Six-lane arterial
  ♦ Along Pyramid Highway between Eagle Canyon Drive/La Posada Drive and Sparks Boulevard/Highland Ranch Parkway.
  ♦ Along Pyramid Highway between Disc Drive and Queen Way. The proposed lanes would match the improvements currently being constructed for the Pyramid Highway/McCarran intersection under a separate project.
  ♦ Along Disc Drive between Pyramid Highway and Sparks Boulevard.

• Five-lane Arterial
  ♦ Along Disc Drive between Sparks Boulevard and Vista Boulevard

Each Arterial Alternative would include grade-separated interchanges at the following locations:

• Sparks Boulevard/Highland Ranch Parkway: diamond interchange.

To accommodate the proposed Pyramid Highway improvements, each Arterial Alternative would modify the following major roadway accesses at Pyramid Highway, listed north to south:

• Calle de la Plata: Full movement signalized intersection with reconfigured lanes.
• Egyptian Drive/Sunset Springs Lane: Full movement signalized intersection with reconfigured lanes
• West Sky Ranch Boulevard: Eliminates left turn access; change to right-in/right-out access only.
• Eagle Canyon Drive/La Posada Drive: Full movement, signalized intersection with reconfigured lanes.
• Robert Banks Boulevard: Eliminates left turn access; change to right-in/right-out access only.
• David James Boulevard: Eliminate Pyramid Highway access and build cul-de-sac because of proximity to Dolores Drive.
• Dolores Drive: Full movement, signalized intersection with reconfigured lanes.
• Lazy 5 Parkway: Full movement, signalized intersection with reconfigured lanes.
• Kiley Parkway: Eliminate Pyramid Highway access and build cul-de-sac because of proximity of the Sparks Boulevard interchange.
• Disc Drive: Full movement, signalized intersection with reconfigured lanes to accommodate improvements.

In addition to access changes at major roadways, access to Pyramid Highway will be changed to right-in/right-out only at the following locations:

• Commercial driveways just north of Eagle Canyon Road
• Driveways between Robert Banks Boulevard and Eagle Canyon Drive
• Various driveways between Lazy 5 Parkway and Tierra del Sol
The existing right-in/right-out access at Tierra Del Sol Parkway and Spanish Springs Library will be maintained. Minor changes will be made at these locations as necessary to tie into the improved Pyramid Highway.

Changes to commercial access along Disc Drive east of Pyramid Highway are also common to all arterial alternatives. These changes include eliminating left-turn access to the shopping center located on the north side of Disc Drive between Sparks Boulevard and Vista Boulevard; driveways will become right-in/right-out access only.

Each Arterial Alternative would include construction of auxiliary lanes on US 395 between the US 395 Connector and McCarran Boulevard.

Each Alternative would also eliminate the existing Dandini Drive connection to Sun Valley Boulevard and provide new connections between Raggio Parkway and Sun Valley Boulevard by extending West 1st Avenue and West 2nd Avenue to the west to intersect Raggio Parkway.

**Bicycle and Pedestrian Improvements**

Each Arterial Alternative would include construction of a shared-use path along Pyramid Highway between Calle de la Plata and Disc Drive. This path would continue west from Disc Drive to Sun Valley Boulevard along the US 395 Connector alignment. At Sun Valley Boulevard, the shared-use path would separate from the US 395 Connector and be accessed using the existing local street facilities along Sun Valley Boulevard and Dandini Drive. The shared-use path continues west as an extension of Dandini Drive just west of Sun Valley Boulevard to the intersection of Raggio Parkway and Dandini Drive. Bike lanes and sidewalks on both Raggio Parkway and Dandini Drive would be provided to allow bicyclists and pedestrians access to the TMCC, DRI campuses, and Parr Boulevard. These facilities would improve existing connectivity because Dandini Drive does not currently provide bike lanes or sidewalks.

Other bicycle and pedestrian improvements would occur along the extensions of West 1st and 2nd Avenues. Both of these streets would be repaved, restriped for bike lanes, and sidewalks provided as required to comply with the Americans with Disabilities Act (ADA).

**Transit Improvements**

Each Arterial Alternative would include the addition of regional bus service along Pyramid Highway and Prater Boulevard between Calle de la Plata and the RTC Centennial Plaza, to serve corridor demand consistent with the service standards of RTC. The arterial alternatives also would include construction of transit/carpool lots near the Pyramid Highway alignment at Calle de la Plata, Eagle Canyon Drive/La Posada Drive, and Los Altos Parkway. At Calle de la Plata, the lot would be located in the southeast quadrant of the intersection; at Eagle Canyon/La Posada Drive, the lot would be located in the southeast quadrant of the intersection; at Los Altos, the lot would be shared with the Walmart parking lot, requiring coordination with Walmart. If Walmart does not agree to share the parking lot, an alternate site may be identified during final design.

**Bridges**

Each Arterial Alternative would include construction of many structures in the Study Area. Bridges and retaining walls would be built or modified to accommodate the proposed improvements. Bridges would be required at each interchange along the corridor. The bridges included in each Arterial Alternative are listed below. Because of the high number of bridges and the design effort required for each, bridge design will continue during final design.
The proposed bridges are listed below in order, beginning at the US 395 interchange in the western portion of the study area, then moving east toward Pyramid Highway, then moving north along Pyramid Highway to Call de la Plata.

- **Bridges Common to all Arterial Alternatives**
  - US 395 Interchange at Parr Boulevard
    - Parr Boulevard over US 395 (replacement of existing structure)
    - Raggio Parkway over NE Ramp (NE = North to East)
    - WS Ramp over US 395
    - WS Ramp over Raggio Parkway
    - WS Ramp over R-1 Ramp (On ramp from Parr Boulevard/Raggio Parkway to the US 395 Connector.
    - WS Ramp over P-2 Ramp (Parr service interchange north off ramp)
  - Pyramid arterial over Sparks Boulevard
- **Arterial Alternative 1 (Total Structures for Alternative 1 = 12)**
  - Raggio Parkway over US 395 Connector arterial
  - US 395 Connector arterial over Sun Valley Boulevard
  - US 395 Connector arterial over Leon Drive
  - US 395 Connector arterial over Disc Drive westbound on ramp
  - US 395 Connector Py-2 (Southbound off ramp to Pyramid)
- **Arterial Alternative 2 (Total Structures for Alternative 2 = 14)**
  - Raggio Parkway over US 395 Connector arterial
  - US 395 Connector arterial over Sun Valley Boulevard
  - Northbound Direct Connect ramp over US 395 Connector arterial
  - Northbound Direct Connect ramp over Pyramid arterial
  - Pyramid arterial over Los Altos Drive
  - Northbound Direct Connect ramp over Los Altos Parkway
  - Southbound Direct Connect ramp over Los Altos Parkway
- **Arterial Alternative 3 (Total Structures for Alternative 3 = 11)**
  - West Sun Valley Interchange:
    - Raggio Parkway over US 395 Connector arterial
  - US 395 Connector arterial over Sun Valley Boulevard
  - US 395 Connector arterial over Disc Drive westbound on ramp
  - US 395 Connector arterial Py-2 (Southbound off ramp to Pyramid)
- **Arterial Alternative 4 (Total Structures for Alternative 4 = 15)**
  - West Sun Valley Interchange:
    - Raggio Parkway over US 395 Connector arterial
  - US 395 Connector arterial over Sun Valley Boulevard
  - US 395 Connector freeway over Leon Drive
  - Northbound Direct Connect ramp over US 395 Connector arterial
  - Northbound Direct connect ramp over Pyramid arterial
  - Pyramid arterial over Los Altos Drive
  - Northbound Direct Connect ramp over Los Altos Parkway
  - Southbound Direct Connect ramp over Los Altos Parkway
**Retaining Walls, Traffic Noise Barriers, and Screening Walls**

Retaining walls would be constructed where necessary along the corridor to allow construction of the interchanges or to eliminate or minimize impacts. Table 2 lists proposed retaining wall locations at the current level of preliminary design. The exact location and design of retaining walls will be determined during final design.

Traffic noise barriers would be constructed to mitigate traffic noise impacts per regulation and policy. Recommendations for traffic noise barriers will be made once the traffic noise analysis being conducted for the Final EIS is completed.

Screening walls would be constructed to mitigate visual impacts in Environmental Justice (low-income and minority populations) areas caused by construction of proposed roadway improvements, if such screening walls are supported by the affected neighborhoods. Visual screening also could be provided by earthen berms built using excess earthwork material. This visual screening also might provide some traffic noise reduction.

**Water Quality and Drainage Improvements**

Each Arterial Alternative would include construction of water quality and drainage improvements. These would include the construction, or replacement, of culverts, inlets, and ditches along the impacted roadways, as well as the construction of permanent water quality basins. The number of facilities required by the Arterial Alternatives is summarized below.

<table>
<thead>
<tr>
<th>Arterial Alternative</th>
<th>Culverts</th>
<th>Ditches</th>
<th>Water Quality Ponds—Number (Cumulative Approximate Acre-Feet)</th>
<th>Ditch/Channel Relocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative 1</td>
<td>37</td>
<td>23</td>
<td>10 (54)</td>
<td>1</td>
</tr>
<tr>
<td>Alternative 2</td>
<td>24</td>
<td>22</td>
<td>11 (55)</td>
<td>2</td>
</tr>
<tr>
<td>Alternative 3</td>
<td>34</td>
<td>28</td>
<td>10 (57)</td>
<td>1</td>
</tr>
<tr>
<td>Alternative 4</td>
<td>27</td>
<td>21</td>
<td>11 (54)</td>
<td>2</td>
</tr>
</tbody>
</table>

In general, water quality ponds would be located at existing low-lying areas along the Arterial Alternatives. These existing low areas include near the US 395 interchange, in Sun Valley, near the south end of Wedekind Park, along Disc Drive, near Kiley Parkway, north of Lazy 5 Parkway, and south of Eagle Canyon/La Posada Drive.
### Table 2  Proposed Retaining Wall Locations for Arterial Alternatives

<table>
<thead>
<tr>
<th>Interchange</th>
<th>Arterial Alternative</th>
<th>Location</th>
<th>Approx. Length</th>
<th>Approx. Average Height</th>
<th>Approx. Maximum Height</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 395/ Parr Blvd./ US 395 Connector System Interchange</td>
<td>All Arterial Alts.</td>
<td>Along Parr service southbound on-ramp</td>
<td>380 feet</td>
<td>16 feet</td>
<td>37 feet</td>
<td>This wall has significant variations in height due to the grading of the surrounding properties. Placed to minimize right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along US 395 westbound to southbound system on-ramp</td>
<td>450 feet</td>
<td>5 feet</td>
<td>10 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along southbound US 395 just north of Sutro Street</td>
<td>640 feet</td>
<td>10 feet</td>
<td>15 feet</td>
<td>Placed to minimize right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along southbound US 395 at ramp bridge</td>
<td>260 feet</td>
<td>22 feet</td>
<td>22 feet</td>
<td>Placed along bridge abutment.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Between two ramps</td>
<td>850 feet</td>
<td>12 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td>Sun Valley</td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R1 ramp</td>
<td>1420 feet</td>
<td>18 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R2 ramp</td>
<td>420 feet</td>
<td>6 feet</td>
<td>13 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R4 ramp</td>
<td>1175 feet</td>
<td>10 feet</td>
<td>16 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R1 ramp</td>
<td>425 feet</td>
<td>33 feet</td>
<td>48 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R2 ramp</td>
<td>295 feet</td>
<td>5 feet</td>
<td>8 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R3 ramp</td>
<td>400 feet</td>
<td>20 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R4 ramp</td>
<td>750 feet</td>
<td>30 feet</td>
<td>42 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Sun Valley south of Rampion Way Crossing at Leonesio Drive</td>
<td>256 feet</td>
<td>10 feet</td>
<td>18 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 3</td>
<td>Wall along R3 ramp</td>
<td>660 feet</td>
<td>30 feet</td>
<td>35 feet</td>
<td>Wall to avoid impacts to the Prosser Valley Ditch</td>
</tr>
<tr>
<td></td>
<td>All Arterial Alts.</td>
<td>Wall along W. 1st Avenue at Lois Allen Elementary School for the West of Sun Valley Interchange</td>
<td>320 feet</td>
<td>11 feet</td>
<td>19 feet</td>
<td>Minimizes impacts to the playground area and driveway access to Lois Allen Elementary School.</td>
</tr>
</tbody>
</table>
### Table 2: Proposed Retaining Wall Locations for Arterial Alternatives

<table>
<thead>
<tr>
<th>Interchange</th>
<th>Arterial Alternative</th>
<th>Location</th>
<th>Approx. Length</th>
<th>Approx. Average Height</th>
<th>Approx. Maximum Height</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>All Arterial Alts. Wall along shared-use path</td>
<td>315 feet</td>
<td>15 feet</td>
<td>28 feet</td>
<td>Wall to avoid large cut</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Arterial Alt. 1 Wall behind Walmart</td>
<td>435 feet</td>
<td>24 feet</td>
<td>40 feet</td>
<td>Wall height varies significantly to mitigate impacts to existing cut slope behind Walmart.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Arterial Alts. 1 and 3 Pyramid Highway between Disc Drive and Los Altos Parkway</td>
<td>610 feet</td>
<td>4 feet</td>
<td>6 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Arterial Alts. 1 and 3 Pyramid Highway south of Golden View</td>
<td>800 feet</td>
<td>8 feet</td>
<td>12 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Arterial Alts. 2 and 4 Wall along Pyramid Highway north of Golden View Drive</td>
<td>860 feet</td>
<td>6 feet</td>
<td>13 feet</td>
<td>Placed to minimize right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Arterial Alts. 2 and 4 Seven individual walls along Los Altos Ramps</td>
<td>Varies</td>
<td>Varies</td>
<td>Varies</td>
<td>All Walls Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Arterial Alts. 2 and 4 Wall along Disc NB direct connect ramp</td>
<td>280 feet</td>
<td>17 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Arterial Alts. 2 and 4 Wall along Disc NB direct connect ramp</td>
<td>310 feet</td>
<td>15 feet</td>
<td>30 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td></td>
<td>All Arterial Alts. Pyramid Highway just north of Queen Way</td>
<td>200 feet</td>
<td>6 feet</td>
<td>6 feet</td>
<td>This wall protects against impacts to the Orr Ditch</td>
</tr>
<tr>
<td></td>
<td></td>
<td>All Arterial Alts. Pyramid Highway just south of Wedekind Park</td>
<td>500 feet</td>
<td>15 feet</td>
<td>28 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
</tr>
<tr>
<td></td>
<td></td>
<td>All Arterial Alts. Disc Drive between Sparks Boulevard and Vista Boulevard, south side</td>
<td>1200 feet</td>
<td>6 feet</td>
<td>10 feet</td>
<td>This wall will likely be higher than indicated but any additional height will be used as a traffic noise barrier instead of a retaining wall. Placed to avoid right-of-way acquisition.</td>
</tr>
</tbody>
</table>
Earthwork

Earthwork refers to the excavation and embankment of earth associated with construction. At this time, specific locations for temporary or permanent storage of excess material have not been identified. It is anticipated that much of the material can be stockpiled or disposed of throughout the project limits using a variety of methods and concepts. Off-site hauling of excess material is an option but would increase the overall project cost. Concepts for handling or reducing excess material include:

- Using excess material within other areas within the project limits where fill material is needed.
- Flattening major fill slopes along roadways as a way to increase reuse of excess material.
- Steepening cut slopes along roadways where material is found to be stable.
- Placing material along roadside shoulders to create visual screening barriers.
- Placing material within the infield areas between ramps of areas at interchanges.
- Placing material in support of third party master plan developments.
- Using material to develop and advance proposed regional parks.
- Infilling expended portions of material pits located near the project limits.
- Refining roadway alignment elevations as part of future designs.
- Placing walls in strategic locations to reduce major cuts.

Arterial Alternative Elements in Addition to Common Elements

This section describes elements of each arterial alternative in addition to those described under Common Elements. For reference, Table 3 summarizes the major design elements of each Arterial Alternative.

<table>
<thead>
<tr>
<th>Table 3</th>
<th>Major Elements of Arterial Alternatives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design Element</td>
<td>Arterial Alt. 1</td>
</tr>
<tr>
<td>Alignment</td>
<td></td>
</tr>
<tr>
<td>Off Alignment</td>
<td>X</td>
</tr>
<tr>
<td>On Alignment</td>
<td></td>
</tr>
<tr>
<td>Ridge Alignment</td>
<td></td>
</tr>
<tr>
<td>Interchange in Sun Valley</td>
<td></td>
</tr>
<tr>
<td>Sun Valley Interchange</td>
<td>X</td>
</tr>
<tr>
<td>West Sun Valley Interchange</td>
<td></td>
</tr>
<tr>
<td>Sun Valley Boulevard Crossing Location</td>
<td></td>
</tr>
<tr>
<td>North Crossing (Rampion Way)</td>
<td></td>
</tr>
<tr>
<td>South Crossing (south of Rampion Way)</td>
<td></td>
</tr>
</tbody>
</table>
Arterial Alternative 1

Arterial Alternative 1 shown on Figure 2 would be an off alignment just west of the existing Pyramid Highway between the US 395 Connector and Highland Ranch Parkway. This alignment would be located just below the ridgeline of the mountains, west of Walmart. Of the two alternative alignments through Sun Valley, Arterial Alternative 1 would follow the more northern Rampion Way crossing and would include an interchange at Sun Valley Boulevard. For the length of the arterial segment from Highland Ranch Parkway and along the new US 395 connector to US 395, the typical cross-section would be a four-lane arterial, with auxiliary and/or truck lanes provided where warranted by travel demand or grade.

Changes to the local street network in Sun Valley are required as part of the Arterial Alternative 1 and include the widening of Sun Valley Boulevard, the elimination of Rampion Way, and the extension of Leon Drive north to East 1st Avenue. Some driveways along Sun Valley Boulevard would be modified to right-in/right-out only as a result of raised median islands to accommodate the interchange improvements.

Arterial Alternative 1 would have three interchanges, in addition to those common to all alternatives, at the following locations:

- Sun Valley Boulevard: diamond interchange
- Disc Drive: directional interchange
- Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway (existing alignment): directional interchange

Along the existing Pyramid Highway alignment south of Sparks Boulevard/Highland Ranch Parkway to Los Altos Parkway, Pyramid Highway would remain a four-lane arterial, but would be modified by installing a raised median island to limit left turns from driveways and cross streets. Driveways affected include those to the Blue Gem and Oasis Mobile Estates mobile home parks as well as the First Baptist Church. Access to Spring Ridge Drive would be changed to right-in/right-out. South of Los Altos Parkway, existing Pyramid Highway would be upgraded to a six-lane arterial to Disc Drive, again with limited left turn movements. The existing southerly access to the Wal-Mart and at Shoppers Square would remain with slight modifications made to connect to the arterial improvements.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 2   Arterial Alternative 1
**Arterial Alternative 2**

Arterial Alternative 2 shown on Figure 3 would be an alignment following the existing Pyramid Highway between the US 395 Connector and Sparks Boulevard/Highland Ranch Parkway. This alignment would include a six-lane, limited access, arterial cross-section on Pyramid Highway between Sparks Boulevard/Highland Ranch Parkway and Disc Drive. The US 395 Connector would consist of a four-lane arterial cross-section between Disc Drive and US 395 with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector alignment would cross Sun Valley south of Rampion Way and would include an interchange at Sun Valley Boulevard.

Arterial Alternative 2 would have three interchanges, in addition to those common to all alternatives, at the following locations:

- Los Altos Parkway: diamond interchange
- Disc Drive at Pyramid Highway: at-grade intersection with directional ramps to northbound and from southbound Pyramid Highway tying into the US 395 Connector. These directional ramps bypass traffic from the Disc Drive intersection.
- Sun Valley Boulevard: diamond interchange

Access changes to driveways and local streets along existing Pyramid Highway are required as a part of this alternative. The existing Spring Ridge Drive access to Pyramid Highway would be eliminated and two new accesses at the north and south ends of Dorchester Drive would be provided. Other access changes are required to accommodate the mobile home communities east of Pyramid Highway, and include providing a new access road along the frontage of Pyramid Highway to access the Oasis Mobile Estates mobile home park.

Farther south, the southerly access to the Wal-Mart shopping center and the access to Shoppers Square would be eliminated.

Some driveways along Sun Valley Boulevard would be modified to right-in/right-out only as a result of both the widening of Sun Valley Boulevard and the placement of raised median islands to accommodate the interchange improvements. Both West and East Leonesio Drives on the west side of Sun Valley would be cul-de-saced on both sides of the new US 395 Connector.
See Figure 1 for elements common to all Arterial Alternatives.

Figure 3 Arterial Alternative 2
**Arterial Alternative 3**

Arterial Alternative 3 shown on Figure 4 would be an alignment along the ridgeline of the mountains between the US 395 Connector and Highland Ranch Parkway. The US 395 Connector would cross Sun Valley south of Rampion Way and include a diamond interchange immediately west of Sun Valley Boulevard at Raggio Parkway. The US 395 Connector would consist of a four-lane arterial cross-section with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector would cross Sun Valley south of Rampion Way and would include an interchange west of Sun Valley Boulevard.

Aside from the interchange west of Sun Valley Boulevard, this alignment would include two additional interchanges; a directional interchange at the extension of Disc Drive and a directional system interchange with Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway.

Improvements and access changes along existing Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway to Disc Drive would be the same as those described under Arterial Alternative 1. In Sun Valley, both West and East Leonesio Drives in Sun Valley would be terminated with cul-de-sacs on both sides of the new US 395 Connector.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 4  Arterial Alternative 3
Arterial Alternative 4

Arterial Alternative 4 shown on Figure 5 would be an alignment following the existing Pyramid Highway between Sparks Boulevard/Highland Ranch Parkway and the US 395 Connector; the same alignment as Arterial Alternative 2. This alignment would include a six-lane, limited access, arterial cross section located on Pyramid Highway between the Sparks Boulevard/Highland Ranch Parkway intersection and Disc Drive. The US 395 Connector would consist of a four-lane arterial cross-section between Disc Drive and US 395 with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector alignment would follow the more northern Rampion Way crossing of Sun Valley and would include an interchange immediately west of Sun Valley Boulevard at Raggio Parkway.

Like Arterial Alternative 2, this alternative includes three additional interchanges at Los Altos Parkway, Disc Drive, and west of Sun Valley Boulevard.

Access changes along Pyramid Highway are similar to Arterial Alternative 2. Access changes in Sun Valley are similar to those under Arterial Alternative 1, except that there would be no impacts to existing driveways because no widening along Sun Valley Boulevard would occur.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 5 Arterial Alternative 4
August 8, 2017

MS. REBECCA PALMER
STATE HISTORIC PRESERVATION OFFICER
NEVADA STATE HISTORIC PRESERVATION OFFICE
901 S STEWART STREET SUITE 5004
CARSON CITY NEVADA 89701-4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Request for Concurrence on Area of Potential Effects
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

The purpose of this letter is to respond to your questions and requests for clarification in your May 18, 2017 letter regarding the Direct and Indirect Areas of Potential Effect (APEs), and request your concurrence with the APEs as described in this letter for the above-referenced undertaking.

In our previous consultation with your office, we differentiated between archaeological and historic architecture Direct APEs. Your May 18, 2017 letter refers to Direct and Indirect APEs without differentiating between archaeological and historic architecture. To be clear and consistent when describing the APEs for this undertaking, this letter refers only to Direct and Indirect APEs from this point forward. Previous consultation letters regarding the APEs for this undertaking are provided in Attachment A for your reference; however, the APE descriptions provided in this letter and attachments supersede that provided in previous consultation. The reports referenced in this letter were provided to your office previously. Please refer to Attachment A of our April 19, 2017 letter to your office for a description of this undertaking.

This letter is organized as follows:

1. Responses to State Historic Preservation Officer's (SHPO's) May 18, 2017 questions
2. Indirect APE changes and clarification
   a. Parcels added to the Indirect APE
   b. Clarify areas where the Direct and Indirect APEs are one in the same
3. Level of identification
   a. Historic architecture resources
   b. Archaeological resources
4. Request for concurrence on APEs
Ms. Rebecca Palmer  
State Historic Preservation Officer  
Nevada State Historic Preservation Office  
901 S Stewart Street Suite 5004  
Carson City, Nevada 89701-4285

Re: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada  
Request for Concurrence on Area of Potential Effects  
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1. Responses to State Historic Preservation Officer's (SHPO's) May 18, 2017 questions  
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   a. Parcels added to the Indirect APE  
   b. Clarify areas where the Direct and Indirect APEs are one in the same  
3. Level of identification  
   a. Historic architecture resources  
   b. Archaeological resources  
4. Request for concurrence on APEs
1. Responses to SHPO's May 18, 2017 questions:

Following are responses to your questions, which have been lettered for ease of reference.

a. **Question:** It is not clear if, or where, staging areas will be located in the Direct APE.
   
   **Response:** The Direct APE was developed to accommodate likely construction staging areas. The Direct APE is shown on a USGS topographic map on attached Figure 1. For your reference, the attached Figure 2 provides the USGS topographic map with the APEs removed.

b. **Question:** It is not clear if the Direct APE includes the 100-meter buffer mentioned in the March 28, 2017 meeting minutes.
   
   **Response:** The Direct APE is the same for historic architecture and archaeological resources. The Direct APE includes the construction footprints of all arterial alternatives and construction staging areas (see attached Figure 1). A 100-foot (not meter) buffer was added to the survey conducted for the Preferred Alternative only and it is inside the indirect APE. Refer to the *Level of Identification* section below for more details.

c. **Question:** It is not clear what the total acreage of the established Direct APE is at this time.
   
   **Response:** The Direct APE consists of approximately 2,765 acres.

d. **Question:** It is not clear why the Indirect APE has several "cutouts," some of which are alongside or near areas where work will occur. The APE also has several areas in which it appears very narrow, versus other areas where it extends a considerable distance. In order to better understand why the APE is shaped in this manner, more information is needed about the location and type of each of the proposed new vertical elements. The SHPO suggests submitting a new set of maps, similar to those depicting the various arterial alternatives (Figures 1-5), that show exactly where light poles, retaining walls, elevated roadway segments, and other new vertical elements will be located. The maps could be color-coded to differentiate between elements of different heights. Ideally, those elements can be depicted on maps that also show the Indirect APE so that our office can better understand the rationale behind the APE’s shape. As the SHPO previously discussed with NDOT, the Indirect APE should be based on topography and viewshed and not on parcel boundaries. We request a meeting with your architectural historian to discuss the above.
   
   **Response:** The Indirect APE is shown on attached Figure 1 and Figure 3. The "cutouts" that appear within the APE are due to one of the following reasons:

   - **Cutouts alongside or near areas where work will occur:** These cutouts represent existing roadway right-of-way (ROW) located adjacent to existing roadway (see example below). Because proposed work will occur within existing ROW, the Indirect APE in these locations is identical to the Direct APE.

   **Note:** in the examples provided below, the Indirect APE is represented by the orange-shaded areas, and the Direct APE is represented by red areas (which represent permanent impact areas) and yellow areas (which represent temporary impact areas).
• **Cutouts within the APE:**
  - Parcels adjacent to existing road and adjacent to proposed new alignment were included in the Indirect APE, but due to the distance between the existing road and new roadway alignment, some parcels located in between were not included in the APE, resulting in cutouts. See example below.

  - Some cutouts within the Indirect APE are a result of large and/or irregularly shaped parcels adjacent to the Direct APE. An example of this is not provided in this letter, but can be seen on attached Figure 1 and 3 south side of Disc Drive.

• Regarding areas of the Indirect APE that appear very narrow versus other areas that extend a considerable distance:
The Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (January 2012; revised December 2012) describes the methodology used to establish the historic architecture Direct and Indirect APEs, with which your office previously concurred. Excerpts from the above-referenced report describing the APE methodology are provided below, which explain why there are narrower and wider areas of the Indirect APE:

Page 10: "In consultation with the State Historic Preservation Office (SHPO), the FHWA determined that an appropriate Area of Potential Effect (APE) for historic structures would include parcels immediately adjacent to the Pyramid Highway, near Nevada State Highway 443, parcels bordering vacant lots that are immediately adjacent to these routes, and parcels that will be visually impacted by the proposed improvements. The APE is approximately 12.7 miles long, beginning at Calle de la Plata and ending at Queen Way as well as in the vicinity of State Highway 443."

Page 30: "A project-specific APE for the built environment has been proposed, in accordance with 36 CFR Part 800.16 (d), which defines an APE as: 'The geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.'

"NDOTs' architectural historian, Elizabeth Dickey, drew the proposed project APE to ensure identification of all significant (listed in or eligible for inclusion in the NRHP) historic and architectural resources that have the potential to be directly or indirectly affected by the proposed project. For a parcel to be identified as part of the APE, a demonstrable effect, including but not limited to: a taking, visual, audible or atmospheric effects that would result from the project must be anticipated. Where alterations to the existing road would not require a taking of land, nor appreciably change views to or from the parcel, its setting would not be altered, and noise levels would not substantially change; the parcel was not included within the proposed APE boundaries [emphasis added].

"The APE, as put forth by NDOT, includes the proposed project right-of-way and/or areas of direct ground disturbance as they are presently anticipated which include areas for staging and temporary building activities. The proposed APE encompasses entire parcels (bounded by the parcel lot lines), from which any partial or full acquisition or other effects (including visual or audible effects) are expected to result from the proposed project [emphasis added]."
"In keeping with NDOT policies and practices, the project-specific viewshed is proposed as a component of the APE. The identified viewshed expands the fundamental APE, as it includes properties that may have vista-related, rather than direct impacts. The viewshed, which is part of the proposed APE, includes all properties whose views to and from the proposed project may be substantially different from existing or baseline conditions. If the current viewshed includes an existing large freeway, a related interchange or overcrossing, or an improved multi-lane highway and the proposed viewshed would contain essentially the same views, the property would not be included in APE boundaries. For a property to be included in the viewshed and thus the APE, a demonstrable effect could be expected to be caused by the changed views that would result from construction and implementation of the proposed project." [emphasis added]

- In some areas, the Indirect APE is very narrow in some areas and extends larger distances in other areas due to irregularly-shaped and/or large parcels along the corridor; parcel boundaries within the Indirect APE can be seen on attached Figures 1 and 3.

- In a few areas where only at-grade work will occur, the Direct and Indirect APE are one in the same. For simplicity, these areas are shown as part of the Direct APE on attached Figure 1. See example of such an area below (in example below, the Direct APE is shown by the red areas (which indicate permanent impacts) and yellow areas (which indicate temporary impacts), and Indirect APE is shown as the orange area) (also refer to the Clarify areas where Direct and Indirect APEs are one in the same section later in this letter):
Regarding your request for more mapping and information about the location and type of proposed new vertical elements for the various arterial alternatives, the attached Figure 3 shows the Indirect APE and all arterial alternative footprints that have been color coded to indicate the different elevated and at-grade project elements, summarized below.

- **At-grade improvements on existing facility (indicated by blue shading on attached Figure 3).** These improvements include elements such as road widening, striping, and bicycle/pedestrian facilities on existing facilities. These improvements occur along existing Pyramid Highway, Disc Drive, Sun Valley Boulevard, and US 395. Because these improvements would occur at-grade where facilities already exist, indirect effects, including visual and noise, would be limited to adjacent parcels.

- **At- or below-grade improvements on new alignment (indicated by green shading on attached Figure 3).** These improvements include construction of new road and bicycle/pedestrian facilities on new alignments. These improvements occur along the proposed new US 395 Connector. The location of at- or below-grade elements along the US 395 Connector alignment varies depending on the arterial alternative and the topography along each alignment. These improvements also occur in Sun Valley where Dandini Boulevard and Raggio Parkway would be realigned to accommodate the new US 395 Connector, and where Raggio Parkway would be extended north to 2nd Avenue. These types of improvements potentially would have greater visual impacts than improvements to existing facilities, depending on the viewed shed.

- **Elevated section/improvements (indicated by purple shading on attached Figure 3).** These improvements include bridges, overpasses, and ramps associated with grade-separated interchanges and new road alignments on hilly terrain. These improvements occur in areas along Pyramid Highway between Sparks Boulevard and Disc Drive, in areas along the new US 395 Connector (depending on terrain and the arterial alternative alignment), areas within Sun Valley, and the US 395/Parr Boulevard/US 395 Connector interchange. These types of improvements potentially would have greater visual impacts than those described above, depending on the existing setting and viewed shed.

- **Tie-in sections (indicated by bright pink shading on attached Figure 3).** These improvements include minor at-grade improvements to intersecting roadways in order for those roads to tie-in to the proposed road improvements. These improvements occur at certain intersecting roads along Pyramid Highway and Disc Drive. Because these improvements would occur at-grade where road facilities already exist, indirect effects, including visual, would be limited to adjacent parcels.

Vertical elements such as light poles, traffic signals, and signage were also considered in developing the Indirect APE. However, at the current level of preliminary design, the exact locations of light poles have not been determined; this will be determined during final design. As such, the exact locations of light poles are not provided. Overall, however, street lights would be installed at intersections along the improved roadway corridors and other areas for safety according to NDOT standards. Traffic signals are proposed at intersecting streets along Pyramid Highway that are currently stop sign controlled, including Calle de la Plata, Egyptian Drive/Sunset Springs Lane, and Dolores Drive.
The Indirect APE encompasses areas that may experience demonstrable indirect effects from the undertaking. In many areas, views of proposed improvements are blocked by existing development and topography, are visually indistinguishable due to distance, or are consistent with existing views. The following factors were considered in determining the Indirect APE:

- **Type of improvement:** Resurfacing, road widening, bridge/overpass/ramp, lighting, bicycle/pedestrian facilities, or tie-in improvements.
- **Context of improvement:** Improvements on existing transportation alignment (within existing built environment or within undeveloped environment), or on new alignment (within existing built environment or within undeveloped environment).
- **Viewshed:** at-grade, below grade, or above grade improvements; topography; line-of-sight; vantage points.
- **Viewshed from improvement:** Approximate distance in feet.
- **Historic Property Type (if known):** Setting, property sensitivity to visual and auditory effects, historic associations.
- **Whether adjacent parcel captures viewshed.**

Table 1 (attached) presents the rationale used to establish the Indirect APE boundary based on the factors listed above, and broken out by segments listed below and shown on attached Figure 3. Table 2 (attached) provides viewshed photos for each segment.

- **Segment A:** Along Pyramid Highway – starting north of Calle de la Plata and ending south of Lazy 5 Parkway.
- **Segment B:** Along Pyramid Highway starting south of Lazy 5 Parkway and ending at south of Kiley Parkway.
- **Segment C:** Along Pyramid Highway starting south of Kiley Parkway and ending north of Los Altos Parkway.
- **Segment D:** Along Pyramid Highway starting north of Los Altos Parkway and ending at Disc Drive.
- **Segment E:** Along Pyramid Highway starting at Disc Drive and ending at Queen Way, and along Disc Drive from Pyramid Highway east to Vista Boulevard.
- **Segment F:** Along the new US 395 Connector alignments for the various arterial alternatives starting south of Sparks Boulevard and ending east of Sun Valley.
- **Segment G:** The US 395 Connector alignment alternatives crossing through Sun Valley over Sun Valley Boulevard, starting east of Sun Valley Boulevard and ending west of Sun Valley Boulevard.
- **Segment H:** Sun Valley Boulevard/Clear Acre Lane starting south of 1st Avenue and ending north of Crystal Lane.
- **Segment I:** Along new US 395 Connector starting west of Sun Valley Boulevard and ending at US 395.
- **Segment J:** An approximate 1.5 mile stretch of US 395 at the existing US 395/Parr Boulevard interchange.
2. Indirect APE changes and clarification

a. Parcels added to the Indirect APE:

In reviewing the Indirect APE to respond to your questions, we identified a few parcels that needed to be added to the Indirect APE, and locations where it needs to be clarified that the Direct and Indirect APE are one in the same. These changes were made to the Indirect APE boundary and are reflected in the Indirect APE illustrated on the attached figures. The parcels added to the Indirect APE are listed below (listed north to south, and east to west) and identified on attached Figures 1 and 3. The identification of National Register of Historic Places (NRHP)-eligible resources within the added parcels will be addressed in our forthcoming determination of eligibility and effects letter, which will be prepared once your concurrence on the APEs is received.

- Remainder of parcel located east of Pyramid Highway south of La Posada Drive.
- Parcel located west of Pyramid Highway near Kiley Parkway intersection.
- Four adjacent parcels located within residential development in southeast quadrant of Pyramid Highway/Kiley Parkway intersection.
- Parcels located at residential cul-de-sac on Dorchester Drive.
- Two adjacent parcels located within northeast quadrant of the Pyramid Highway/Los Altos Parkway intersection.
- Adjacent parcels located west of Pyramid Highway near Los Altos Parkway intersection.
- In Sun Valley, parcel located south of new US 395 Connector (for Alts 2 and 3 only), east side of Sun Valley Boulevard and north of El Rancho Drive.

b. Clarify areas where Direct and Indirect APEs are one in the same

In reviewing the Indirect APE to respond to your questions, we identified locations where it needs to be clarified that the Direct and Indirect APE are one in the same. These areas are located within the project footprint at the locations listed below:

- On Pyramid Highway north of Calle de la Plata.
- On Calle de la Plata where tie-in improvements would be made east and west of Pyramid Highway.
- On Egyptian Drive where tie-in improvements would be made on west side of Pyramid Highway.
- On Dolores Drive west of Pyramid Highway where tie-in improvements would be made.
- On Highland Parkway west of Pyramid Highway where tie-in improvements would be made.
- On Los Altos Parkway east of Pyramid Highway where tie-in improvements would be made.
- On Sparks Boulevard south of Disc Drive where tie-in improvements would be made.
- On Vista Boulevard south of Disc Drive where tie-in improvements would be made.
• In Sun Valley (Alts 1 and 4 only) on Leon Drive (north and south of US 395 Connector) and Franks Lane – includes improvements to existing roads and paving dirt portion of Leon Drive. At proposed cul-de-sacs at Saguaro Drive and Rampion Way on north side of US 395 Connector, and at Sugar Hill Drive south of US 395 Connector.
• In Sun Valley, on 2nd Avenue – at-grade improvements to accommodate connection to extended Raggio Parkway.
• On Sun Valley Boulevard at southern terminus of arterial alternative footprints.

Based on the information provided above, the Indirect APE adequately encompasses the indirect effects potentially caused by this undertaking.

3. Level of identification

a. Historic Architecture Resources: To identify NRHP-eligible historic architectural resources, the Direct and Indirect APEs were surveyed, including file and literature searches and field surveys where access was authorized. Please refer to the Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (January 2012; revised December 2012) for details about specific methodology used for surveys.

b. Archaeological Resources: To identify archaeological resources, first a file and literature search and walkover survey was conducted, beginning in 2010. The file and literature search was conducted for an area that included all four project alternative footprints and lands at least a mile around them. A field walkover survey was conducted to locate and preliminarily identify sites and isolates within the project footprints (also known as the Direct APE). The survey involved on-site inventories of parcels contained within project alternative footprints (Direct APE) where access was allowed. Please refer to the File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (March 5, 2012; Revised May 17, 2012) for more details.

Once the Preferred Alternative was identified (Alternative 3), a Class III cultural resources inventory was conducted in late 2014/early 2015 for the Preferred Alternative construction footprint plus a 100-foot (not meter) wide buffer on either size of the footprint to encompass direct effects from ground-disturbing activities and any applicable indirect effects (the Preferred Alternative construction footprint falls within the Direct APE because the Direct APE includes the construction footprint and staging areas for all arterial alternatives).

4. Request for concurrence on APEs

The Section 106 consultation has been ongoing since 2008, based on the foregoing, NDOT and FHWA request your concurrence on the Direct and Indirect APEs and Identification established for this undertaking.

FHWA and NDOT are requesting a 15-day turn around on this letter due to how close we are on getting to agreement.

Once your concurrence is obtained, FHWA and NDOT will consult with your office on determinations of NRHP eligibility and effects.
This information has been forwarded concurrently to the following consulting parties for review: Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California. We will notify you of any responses received from these groups.

If you have any questions please call me at 775-888-7666.

Sincerely,

[Signature]

C. Cliff Creger
Chief Cultural Resources Program Manager

Enclosures:
Attachment A: Previous APE Consultation Correspondence:
- May 18, 2011 FHWA letter to SHPO
- September 8, 2011 FHWA letter to SHPO
- October 11, 2011 SHPO letter to FHWA
- August 31, 2012 SHPO letter to FHWA
- October 14, 2015 SHPO letter to FHWA
- April 19, 2017 FHWA letter to FHPO
- May 18, 2017 SHPO letter to FHWA

Figure 1: Direct and Indirect APEs on USGS topo
Figure 2: USGS topo with APE shapes removed
Figure 3: Indirect APE and Arterial Alternative Elements on aerial
Table 1: Factors Used to Determine Indirect APE Boundary
Table 2: Viewshed Photos, by Segment

cc: Abdelmoez Abdalla, FHWA
Jacob Waclaw, FHWA
Dale Wegner, FHWA
Greg Novak, FHWA
Pyramid Lake Paiute Tribe
Reno-Sparks Indian Colony
Washoe Tribe of Nevada and California
Doug Maloy, RTC
Jim Clarke, Jacobs
Bryan Hockett, BLM
Subject: Request for Concurrence on Pyramid Highway/US 395 Connection Project, Washoe County, Nevada EA: 73391

Dear Ms. Palmer:

The Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is preparing an Environmental Impact statement (EIS) for the proposed improvements to Pyramid Way (SR 445) and to construct a new corridor from Vista Boulevard to US 395 in Washoe County, Nevada. FHWA requests that you review the information provided, and concur with FHWA’s determinations for the Areas of Potential Effect for archaeological and historic architectural resources for the proposed project.

Project Purpose and Description

The purpose of the project is to relieve traffic congestion on the Pyramid Highway and provide improved east/west community connectivity from Pyramid way to US 395 and east to Vista Boulevard.

The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way to Calle de la Plata Drive. It also includes an area extending approximately 5 miles, from east of Vista Boulevard to US 395 near the Parr/Dandini interchange. The area along Vista Boulevard to US 395 is also included (see enclosed maps).

The project involves widening of the Pyramid Highway from Queen Way to Calle de la Plata Drive and construction of an interconnector highway from Pyramid Highway to US 395.

The major components of the project, including its alternatives might include:

- Construction of bridges (25’ to 28’ high) on Pyramid Highway over the following cross streets and locations:
  1. Eagle Canyon Road
  2. Delores Drive
  3. Lazy 5 Parkway
  4. Sparks Boulevard
  5. Golden View
6. Just north of Los Altos Parkway
7. Northwest of the Pyramid Highway/Disc Drive Intersection (Bridge 17B)
8. West of the Pyramid Highway/Disc Drive Intersection (Bridge 18)
9. North of the Pyramid Highway/Disc Drive Intersection (Bridge 19)

• New alignment to the Pyramid Highway that would connect Pyramid Highway with US 395, north of McCarran Boulevard and through Sun Valley.

• Construction of new local roads at the following locations:
  1. Extending Delores Drive and Tierra Del Sol Parkway to an unnamed road to the east.
  2. Connecting Blue Skies Drive with Blue Gem Circle with outlets to Evening Starr Drive and the Oasis Mobile Estate Mobile Home Park.

• Widening and improvements of roads at the following locations:
  1. Disc Drive from Pyramid Highway to the Vista Boulevard
  2. Pyramid Highway between Disc Drive and Queen Way

• Construction and substantial reconfiguration of interchanges at the following locations:
  1. US 395/Pyramid Highway interchange in the vicinity of the Parr Boulevard overpass, including five bridge structures up to 28’ high
  2. Pyramid Highway, First Street and El Rancho Drive, including eight bridge structures up to 28’ high

More information on the Pyramid Highway/US 395 Connection Project can be found on the project website: <http://www.pyramidus395connection.com/index.html>

Archaeology Area of Potential Effect
The archaeological Area of Potential Effect (APE), which includes the project alternatives footprint, is shown in the enclosed Archaeological APE Maps.

Historic Architectural Resource Area of Potential Effect
The historic architectural APE includes the project footprint (including the alternatives), adjacent parcels, and parcels that might be visually impacted by the project. There are 655 parcels in the APE and 617 acres (see enclosed Historic Architecture APE Maps).

If you have any questions, please feel free to call me at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: C. Cliff Creger, NDOT
    Doug Maloy, RTC Washoe

ec: Andrew Soderborg, FHWA
Ms. Rebecca Palmer  
Deputy Historic Preservation Officer  
State Historic Preservation Office  
100 N. Stewart Street, Capitol Complex  
Carson City, Nevada 89701  

Subject: Pyramid Highway/US 395 Connection Project, Washoe County, EA: 73391; WA11-009R  

Dear Ms. Palmer:

Thank you for meeting with the project team on June 16, 2011 to discuss the Pyramid Highway/US 395 Connection project. As discussed in our meeting, this letter provides additional information about the project to supplement the request for concurrence on the Area of Potential Effect (APE) sent to you May 18, 2011. Specifically, more information on project alternatives that will be evaluated in the Environmental Impact Statement (EIS) and their potential effects are included. Enclosed are maps illustrating the project alternatives and parcels within the APE where impacts to NRHP-eligible or potentially NRHP-eligible resources may occur. At this time, FHWA requests that you review the additional information provided, and concur with FHWA’s determination for the APE for Historic Architectural resources for the proposed project.

Project Description

The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive through the communities of Sparks and Spanish Springs. It also includes an area extending more than approximately 5 miles from Vista Boulevard west to US 395 near the Parr/Dandini interchange through the communities of Sparks and Sun Valley (see enclosed maps).

The project involves converting Pyramid Highway from an existing arterial to a freeway facility, arterial widening, and ancillary improvements from Queen Way to Calle de la Plata Drive, and construction of a new freeway facility and ancillary improvements from Pyramid

1 Arterial - A class of roads serving major traffic movements (high-speed, high volume) for travel between major points.  
2 Freeway - A divided arterial highway designed for the unimpeded flow of large traffic volumes. Access to a freeway is rigorously controlled and intersection grade separations are required.
Highway to US 395. Moving from west to east and south to north, the major segments of the project and its alternatives are described below:

**US 395 Interchange**
Improvements involve widening to include one to two auxiliary lanes on US 395 at grade from approximately the McCarran Boulevard interchange north to approximately 1,500 feet north of the Parr / Dandini interchange. To increase interchange capacity, the Parr / Dandini interchange would be replaced at its existing location and grade with a similar diamond-type service interchange. In addition, a new high-speed system interchange approximately 30 feet above the Parr / Dandini interchange would connect US 395 to the Pyramid Highway to the east. No high-speed movements are proposed to the west of US 395. Refer to the enclosed Overview Map and Detail 6 and Detail 7 maps.

**Sun Valley Area**
From the US 395 system interchange, the US 395 Connector would proceed east as a six-lane freeway with sizeable cuts and fills as it crosses the Red Hills north of the Desert Research Institute. As the alignment approaches Sun Valley, it would cross over Sun Valley Boulevard by approximately 30 feet. This crossing can occur at either of two locations: 1) the north crossing at 1st Avenue parallel to an existing powerline corridor, or 2) the south crossing approximately 500 feet north of the Dandini / El Rancho intersection using an undeveloped bluff to the east. Both of these crossing locations would converge at the same general location as they continue east of Sun Valley. Refer to Overview Map and Detail 6 map attached.

In addition to the Sun Valley crossing locations, four interchange options exist. The first two alternatives would be a typical tight diamond interchange connecting directly to Sun Valley Boulevard at one of the two crossing locations described above. The interchange would consist of a bridge approximately 30 feet above the existing Sun Valley Boulevard with ramps to/from the east and west directions, and ramp terminal intersections located about 500 feet apart. Refer to the enclosed Overview Map and Detail 6 map.

The second two alternatives consist of a modified partial cloverleaf service interchange west of Sun Valley proper to reduce potential property displacements. The West of Sun Valley interchange could be located coincident with either the southern or northern crossing of Sun Valley described above. Due to differences in grades, the interchange would consist of loop ramps to/from the west and diamond ramps to/from the east. This would result in a ramp terminal intersection spacing of approximately 1,300 feet. The interchange's location west of existing roadway facilities would require construction of a new two-lane arterial connection to

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3 Capacity - A transportation facility's ability to accommodate a moving stream of people or vehicles in a given time period.

4 Diamond-type interchange - is a common type of road junction, used where a freeway crosses a minor road. The freeway itself is grade-separated from the minor road, one crossing the other over a bridge. Approaching the interchange from either direction, an off-ramp diverges only slightly from the freeway and runs directly across the minor road, becoming an on-ramp that returns to the freeway in similar fashion.

5 High-speed interchange - an interchange designed for speeds over 50 miles per hour.

6 Cuts and fills - In earthmoving, cut and fill is the process of constructing a road whereby the amount of material from cuts roughly matches the amount of fill needed to make nearby embankments, so minimizing the amount of construction labor.

7 Ramp terminal - where highway ramps end in an intersection.

8 Cloverleaf - A cloverleaf interchange is a two-level interchange in which left turns (in countries that drive on the right) are handled by loop roads (U.S.: ramps; UK: slip roads). To go left (in right-hand traffic), vehicles first continue as one road passes over or under the other, then exit right onto a one-way three-fourths loop ramp (270°) and merge onto the intersecting road.
Dandini Boulevard and a four-lane arterial connection to West 1st Avenue. The West of Sun Valley interchange could tie into the planned West Sun Valley Arterial, a regionally significant facility identified in the Washoe RTC Regional Transportation Plan. Located on the side of Red Hill, the West of Sun Valley interchange would be located above- and below-grade, requiring cuts and fills. Refer to the enclosed Overview Map and Detail 6 map.

**Pyramid Corridor Alignments**

East of the Sun Valley Area and north toward Sparks Boulevard, the six-lane US 395 Connector freeway would consist of one of three alignment alternatives: On-Alignment, Off-Alignment, and Ridge Alignment alternatives, as described below:

- **The On-Alignment Alternative** would continue east over the hills to the existing Pyramid Highway, dividing Sun Valley and Sparks. The existing Pyramid facility would be converted from a four-lane arterial to a six-lane freeway from just north of Disc Drive to Sparks Boulevard. Modified split diamond interchanges are proposed at Disc Drive and Golden View Drive, where the freeway would cross approximately 25 feet to 30 feet above the existing grade and consist of ramp terminal intersections located approximately 350 feet apart. The area between these interchanges would be connected by frontage roads. The frontage roads would parallel the freeway facility, generally be at-grade (retaining wall-separated), and create a project footprint approximately 350 feet to 500 feet wide through this section. The mainline freeway would vary in height throughout this section, from a maximum of 30 feet at interchange crossings, to a minimum of 5 feet between interchanges. Refer to the enclosed Overview Map and Detail maps 3 through 5.

- **The Off-Alignment Alternative** would avoid many of the property impacts associated with improving the existing developed corridor. This would be accomplished by turning the six-lane freeway facility northward as it approaches the Pyramid corridor from the west. The alignment generally would be just below the eastern ridgeline of the mountains but west of most of the Pyramid corridor development. This would require sizable cuts and fills as the alignment hugs the ridgeline, which would create visual impacts. An interchange with a westward extension of Disc Drive would be located approximately 0.5 miles west of the commercial core, and an interchange with existing Pyramid Highway would be located approximately 1,500 feet south of Sparks Boulevard. Refer to the enclosed Overview Map and Detail 4 and Detail 5 maps.

- **The Ridge Alignment Alternative** is similar to the Off-Alignment Alternative, except that it would be located farther to the west behind the eastern ridgeline. The Ridge

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9 Frontage Roads - A frontage road (also access road, service road, and many other names) is a non-limited access road running parallel to a higher-speed road, usually a freeway, and feeding it at appropriate points of access (interchanges). In many cases, the frontage road is a former alignment of a road already in existence when the limited-access road was built.

10 At-grade - An at-grade intersection is a junction at which two or more transportation axis cross at the same level (or grade).
Alignment Alternative would create fewer visual impacts than the Off-Alignment Alternative, but would be located farther from commercial and residential development. Similar to the Off-Alignment Alternative, the Ridge Alignment Alternative would include an interchange with the Disc Drive extension over 0.5 miles west of the commercial core and with the existing Pyramid Highway approximately 1,500 feet south of Sparks Boulevard. Refer to the enclosed Overview Map and Detail 4 and Detail 5 maps.

The three Pyramid corridor alignment alternatives described above would require additional improvements in this segment of the project area. Disc Drive would be widened from four lanes to six lanes at-grade from Pyramid Highway to Vista Boulevard. In addition, a new six-lane extension of Disc Drive would connect the Pyramid Highway / Disc Drive intersection with a new US 395 Connector / Disc Drive interchange. The exact location and layout of this interchange varies with each Pyramid corridor alignment alternative. The Disc Drive extension would generally be located below the existing grade, varying between 50 feet to 175 feet below grade. In addition, Pyramid Highway would be widened from four lanes to six lanes at-grade between Queen Way and Los Altos.

**Pyramid Northerly Interchanges and Terminus**
One build alternative is being considered from Sparks Boulevard to the north end of the project. It would consist of a six-lane elevated freeway from Sparks Boulevard to just north of the Eagle Canyon / La Posada intersection, and a six-lane arterial at-grade to Calle de la Plata. The freeway would be elevated, and would vary between five feet to ten feet in height between interchanges. Interchanges would consist of the freeway crossing over the local roadway at a height of approximately 25 feet to 30 feet. Refer to Overview Map and Detail maps 1-3 attached.

Interchanges would consist of a split diamond interchange from Sparks Boulevard to Lazy 5 Parkway, connected by frontage roads. The frontage roads would create a 350- to 500-foot-wide overall footprint. The frontage roads would be constructed at-grade and would be separated from the mainline freeway by retaining walls. A split diamond configuration is proposed between the Dolores Drive and Eagle Canyon / La Posada interchanges. The frontage roads would create a 350- to 500-foot-wide overall freeway footprint. The frontage roads would be at-grade and separated from the mainline freeway by retaining walls.

**Other Project Components**
In addition to the roadway improvements described above, other transportation improvements are proposed. These include bicycle/pedestrian facilities, ranging from bicycle lanes and sidewalks to multi-use paths along portions of the alignment. Bicycle facilities would generally be located at the same grade as adjoining roadway improvements. Park-and-Ride lots of approximately one acre are proposed in the southeast quadrant of the Pyramid Highway / Calle de la Plata intersection, the southeast quadrant of the Pyramid Freeway / Eagle Canyon / La Posada interchange, and as a shared lot with the existing Wal-Mart parking lot. Increased transit service and Intelligent Transportation System (ITS) improvements are included, which would have a negligible effect on the project footprint and viewshed.

**Areas of Potential Effect (APE)**
The Archaeological Area of Potential Effect (APE) will be submitted later in the process once more design information is available.

The Historic Architectural Resource APE for direct and indirect impacts includes the project footprint, adjacent parcels, and parcels that might be visually impacted by the project. The direct impacts will be parcels that will experience takes due to construction of the new highway.

The indirect impacts would include visual effects to properties from construction of the transportation facilities. Visual impacts generally exceed in range the auditory impact (traffic noise analyses focus on parcels adjacent to, or one parcel from, the right-of-way). The project is not expected to induce development that would expand the APE beyond those areas stated above. In terms of induced development, this project includes two types of roadway improvements: improvements to existing roads, or construction of new roads. New road construction for this project generally would occur on steeper slopes in BLM-owned property and/or zoned open space. These areas are not likely to be developed in the reasonably foreseeable future due development restrictions and the costs associated with, developing lands on steep slopes, especially when there are currently a large number of vacant commercial buildings available.

New development, as a result of improvements to existing roads, is not expected to exceed the visual APE range because: 1) there is existing available commercial space on Pyramid Highway, 2) the likelihood that development would be commercial along the existing road, 3) development would be as far from the proposed alignment as current development, and 4) the cost of leveling any new parcel in the APE.

The APE includes 702 parcels in the APE and 631 acres (see enclosed maps). The cutoff date for structures warranting further evaluation for eligibility for listing on the National Register of Historic Places (NRHP) is 1971. This 40-year cut-off date may give the Environmental Impact Statement (EIS) a longer “shelf-life.”

Methodology
NDOT reviewed Washoe County Assessors Department data regarding structure age and identified 11 parcels to be included in the visual/historic architectural APE based on the project alternative alignments. A reconnaissance survey of those parcels was conducted in June 2011 from public rights-of-way and other public spaces. The survey attempted to identify the total number of buildings on a parcel and their relationship to each other, gathered basic descriptive data on their materials and methods of construction to the extent possible, and photographed each building when possible.

Next Steps:

- **Prepare Programmatic Agreement:** A Programmatic Agreement (PA) will be prepared that describes the process by which Section 106 will be accomplished for the project, who is responsible, and when activities will take place. This will allow archaeological site recordation to occur after completion of the Draft EIS but prior to completion of the Final EIS. Further, should design changes warrant additional archaeological investigation, the PA would outline the process for completing Section
106 documentation, subsequent to the Record of Decision (ROD). The PA will be appended to the EIS.

- **Archaeology Inventory**: An Archaeological inventory will be conducted according to Class III standards. Recordation and evaluation of sites will use Appendices D and E from the State Protocol Agreement between the Bureau of Land Management, Nevada, and the Nevada State Historic Preservation Office for Implementing the National Historic Preservation Act, Finalized October 26, 2009.

- **Architectural Inventory**: An architectural inventory of the APE will be completed by Western Cultural Resource Management, Inc. The report will evaluate all pre-1972 buildings in the APE using a Historic Resource Inventory Form.

If you have any questions, please feel free to call me at 775-687-1231.

Sincerely,

A. A. Abdalla
Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: C. Cliff Creger, NDOT
ec: Andrew Soderborg, FHWA
October 11, 2011

Abdelmoez Abdalla, Environmental Program Manager
US Department of Transportation
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Re: Architectural Area of Potential Effect and Project Description for
Pyramid Highway/US 395 Connection Project, Washoe County, Nevada
EA: 73391
WA11-009R
SHPO Undertaking Number: 2010-0884

Dear Mr. Abdalla,

The Nevada State Historic Preservation Office (SHPO) has reviewed the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information submitted in correspondence from FHWA dated September 8, 2011 (received September 12th) the project consists of converting Pyramid Highway from an existing arterial to a freeway and constructing a new freeway from Pyramid Highway to US 395.

Area of Potential Effect (APE)
The SHPO concurs with the Architectural APE as defined in the above referenced correspondence and as illustrated in the APE Map Overview.

Project Description
The SHPO has reviewed the expanded project description. Based on the submitted information, including maps and correspondence, the SHPO understands the following. If this understanding is inaccurate, please clarify.

- The Parr/Dandini Interchange, which is labeled on the map, will be replaced with the 395 System Interchange, which is described in the project description.
- Per APE Map Detail 5, Pyramid Highway appears to be labeled as Sun Valley Boulevard.
For future correspondence, please label all alternatives on the maps to ensure that the written correspondence and maps correlate. The SHPO notes that the 3 different Pyramid Corridor Alignments (On, Off, and Ridge) are labeled individually in Map Details 4, 5. However, in the Sun Valley Area, the four different alternatives in Map Detail 6 are not individually identified. Please label Alternatives 1 through 4, should they be referenced in future correspondence.

Resource Identification
Regarding architectural resources, those constructed in 1972 or earlier will be documented utilizing Nevada’s Historic Resource Information Form (HRIF). The APE includes 702 parcels and 631 acres. Had a buffering system, instead of a parcel system, been utilized to document the APE, perhaps fewer acres or properties would have been surveyed.

Regarding archaeological resources, the SHPO notes that the APE and the corresponding inventory will be submitted once the design information is available.

Programmatic Agreement
At this time, the SHPO concurs with the Architectural APE and awaits a draft copy of the Programmatic Agreement (PA).

If you have questions regarding the architectural contents of this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@nevadaculture.org.

Sincerely,

Rebecca L. Palmer
Deputy State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
August 31, 2012

Abdelmoez Abdalla, Environmental Program Manager
US Department of Transportation
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Re: Additional Information for
Determinations of Eligibility for Pyramid Highway-US 395 Connection Project
Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks Washoe County, Nevada
EA: 73390 & 73391
FHWA: DE-0191(065) & DE-0191(067)
SHPO Undertaking Number: 2010-0884
SHPO Report Number: 8041

Dear Mr. Abdalla,

Thank you for the additional information. The Nevada State Historic Preservation Office (SHPO) has reviewed the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information submitted in correspondence from FHWA dated and received August 3, 2012, the project consists of converting Pyramid Highway from an existing arterial to a freeway and constructing a new freeway from Pyramid Highway to US 395. At this time, the SHPO has been asked to provide comments regarding eligibility only.

The additional information for this project includes a revised historic context and additional documentation in the form of a Historic Resource Inventory Form (HRIF) for the Orr Ditch. This information addresses SHPO’s letter dated March 26, 2012. Thank you.

The revised historic context supports resources evaluated under National Register Criterion A, B, and C. Criteria D was not addressed. ‘This survey did not include archaeological survey, and, thus,
no discussion of Criterion D considerations has been developed. The archaeological resources associated with the proposed undertaking will be described and National Register evaluation recommendations made in a separate report' (page 32). Criterion D, while most often applied to archaeological districts and sites, can apply to buildings, structures, and objects (National Register Bulletin 15, page 21).

Electronic correspondence (dated June 14, 2012) from Sara Fogelquist (SHPO) Liz Dickey (NDOT), regarding the revised context, indicates that ‘As long as the context evaluates the resources under all criteria and addresses all of the resources within the APE...then the context would appear to support the eligibility recommendations in the HRIFs.’ At this time, the SHPO recommends that the resources identified within the APE remain unevaluated under Criteria D.

Resource Identification
Regarding archaeological resources, the SHPO notes that the APE and the corresponding inventory will be submitted once the design information is available.

Regarding architectural resources, those constructed in 1972 or earlier were documented utilizing Nevada’s Historic Resource Information Form (HRIF). The APE includes 702 parcels and 631 acres. Had the APE been constructed by buffer rather than by parcel the APE would have been more appropriate given the scale and nature of the undertaking (36 CRF 800.15.d).

Based on the submitted information:

Thirty-three resources were documented using Nevada’s Historic Resource Inventory Form (HRIF) and 3 potentially eligible historic districts were identified, including the Sierra Vista Ranch Historic District, the Iratcabal Farm Historic District, and the Trosi Family/Kiley Ranch Historic District. (Please see list below.)

Based on the submitted information, the SHPO concurs with FHWA that the following 8 resources are not individually eligible but are eligible as contributing resources within the Sierra Vista Historic District (SHPO Resource Number: D93):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11946</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11947</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11948</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11949</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>5</td>
<td>B11950</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>6</td>
<td>B11951</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>7</td>
<td>B11952</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>8</td>
<td>B11953</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>
Based on the submitted information, the SHPO concurs with FHWA that the following 4 resources are not individually eligible but are eligible as contributing resources within the Trosi Family/Kiley Ranch Historic District (SHPO Resource Number: D94):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11954</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11955</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11956</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11957</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>

The HRF completed for the Trosi Family/Kiley Ranch Historic District includes a reference to a previous survey. "Finally, another portion of this ranch (Locus 1) has been previously recommended eligible under Criterion D due to its ability to offer significant information pertinent to the research topics detailed in other reports (Peterson and Stoner 2003). This portion of the ranch is outside the current parcel boundary due to subdivision of the ranch and ownership changes during the 2000s." the SHPO notes that per the Architectural Inventory, the cited report completed by Peterson and Stoner was not submitted to SHPO for review (page 59). Please forward a copy of this report for SHPO's records and reference.

Based on the submitted information, the SHPO concurs with FHWA that the following 10 resources are not individually eligible but are eligible as contributing resources within the Iratcabal Farm Historic District (SHPO Resource Number: D94):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11958</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11959</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11960</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11961</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>5</td>
<td>B11962</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>6</td>
<td>B11963</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>7</td>
<td>B11964</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>8</td>
<td>B11965</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>9</td>
<td>B11966</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>10</td>
<td>B11967</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>

Based on the submitted information, the SHPO concurs with FHWA that the following 2 properties are eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>S820</td>
<td>Eligible, A &amp; B</td>
</tr>
<tr>
<td>2</td>
<td>S828</td>
<td>Eligible, A, B, C</td>
</tr>
</tbody>
</table>
Based on the submitted information, the SHPO concurs with FHWA that the following 10 properties are not eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11968</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>2</td>
<td>B11969</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>3</td>
<td>B11970</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>4</td>
<td>B11971</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>5</td>
<td>B11972</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>6</td>
<td>B11973</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>7</td>
<td>B11974</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>8</td>
<td>B11975</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>9</td>
<td>B11976</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>10</td>
<td>B11977</td>
<td>Not Eligible</td>
</tr>
</tbody>
</table>

Based on the submitted information, the SHPO cannot concur with FHWA that the following resource is not eligible for listing in the NRHP.

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>S821</td>
<td>Unevaluated</td>
</tr>
</tbody>
</table>

Although the consultant recommended the resource (S 821: The Old Pyramid Highway) as eligible under Criterion A, FHWA recommend the resource as not eligible due to diminished integrity.

The HRIF indicates that resource retains its original alignment and that 'Although the segments recorded are in overall fair condition, they are the only known recorded segments of the old highway and are therefore recommended eligible under Criterion A (page 7). The SHPO questions if there are other examples of the Old Pyramid Highway that retain better integrity and that are being preserved.

The architectural inventory indicates that as a form of mitigation for S821 would be the completion of a document to 'place the impacted segments within the greater context of the highway and they development of the local transportation system' (page 73). The SHPO questions why this would be completed for mitigation and not completed as part of a context to support an eligibility recommendation for the resource. Another context that might further support an eligibility recommendation for S821 is A Cultural Resource Inventory for the Pyramid Lake Paiute Tribe’s Proposed Pelican Pointe Project, Washoe County, Nevada, which was completed in 2011 by Kautz Environmental. A copy is available at the SHPO upon request.

At this time, the SHPO recommends treating S821 as unevaluated.
The SHPO notes that other resources within the APE were identified but were not evaluated on an HRIF. These resources include the Reno Arch Missionary Church (B 11979), the Sparks Christian Church (B 11978), and the Gibbons/Van Meter House (B 11980), all of which are currently in agency review for a different FHWA project.

Project Effects
Although this letter is not intended to address project effects, the SHPO notes that there appears to be a discrepancy between FHWA’s correspondence dated September 8, 2011 and the architectural inventory (revised June 2012), which was submitted with FHWA’s correspondence, dated August 3, 2012.

Per FHWA correspondence (dated 9.8.11):
The project is not expected to induce development that would expand the APE beyond those areas stated above. In terms of induced development, this project includes two types of roadway improvements: improvements to existing roads, or construction of new roads. New road construction for this project generally would occur on steeper slopes in BLM-owned property and/or zoned open space. These areas are not likely to be developed in reasonably foreseeable future due to development restrictions and the costs associated with, developing lands on steep slopes, especially when there are currently a large number of vacant commercial buildings available.

New development, as a result of improvements to existing roads, is not expected to exceed the visual APE range because: 1) there is existing available commercial space on Pyramid Highway, 2) the likelihood that development would be commercial along the existing road, 3) development would be as far from the proposed alignment as current development, and 4) the cost of leveling any new parcel in the APE (page 5).

Per the architectural inventory (revised June 2012):
Other indirect effects anticipated from the proposed transportation improvement project are likely to include further degradation of the setting of the resources due to increased access that can reasonably be expected to lead to greater traffic volumes. Also, further land development (residential and commercial) on the lands near and around the historic properties is anticipated because of increased accessibility offered by the highway improvements. These effects could best be mitigated through the photo-documentation of the historic properties accompanied by intensive archival and oral history research of the three historic districts and the Spanish Springs Valley. Similarly, the cumulative effect of the project is likely to be further urban growth and the degradation of the setting of the historic properties (page 72).

Additionally, regarding the Trosi/Kiley Ranch, per the architectural inventory (revised June 2012):
There are other buildings, including a barn, that were visible from the road and appear to be historically associated with the ranch, but are today outside of the parcel (page 63).
And;

The anticipated view shed alterations at the Trosi Family/Kiley Ranch will involve the introduction of a new intersection and transition from grade level to elevated highway west and northeast of the historic district (page 64).

Based on the information noted above, there appears to be additional, visible resources that were not included in the Area of Potential Effect (APE), given the proposed project description. Although the Programmatic Agreement (PA) for this undertaking is still in draft, the SHPO will require a reevaluation of the APE for visual, audible, atmospheric, and cumulative effects in this document.

If you have questions regarding the architectural contents of this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@shpo.nv.gov.

Sincerely,

Karyn de Dufour
Deputy State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
Re: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada.
EA #73390& 73391/NDOT # WA11-009/FHWA #DE-0191(065) & DE-019(067)/Undertaking 2010-0884

Dear Dr. Abdalla:

The Nevada State Historic Preservation Office (SHPO) acknowledges receipt of the following submission components for the above-noted undertaking: (1) a Federal Highway Administration (FHWA) transmittal letter, dated September 9, 2015 (received September 15, 2015), (2) a complete copy of the Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project In Washoe County, Nevada, and (3) a FHWA letter providing further clarification regarding this undertaking, dated September 28, 2015 (received October 2, 2015).

Upon careful review of the correspondence for this undertaking, the SHPO offers the following comments.

General Observations:

It is not clear if FHWA is consulting with our office (1) directly under the regulations, 36 CFR 800, for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, or (2) under the Programmatic Agreement Among the Federal Highway Administration, the Nevada Department of Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Implementation of Federal-Aid Transportation Projects in the State of Nevada (PA). The SHPO also notes that a project-specific Programmatic Agreement exists in draft form that has not been executed. Would the lead federal agency please clarify under which authority the undertaking will proceed?

Per the SHPO letter, dated August 31, 2012, consultation on the area of potential effect (APE) for this undertaking has not been concluded. Furthermore, both FHWA letters dated September 9, 2015 and September 28, 2015 made additional modifications to the project description and design. Per the September 28, 2015 FHWA letter, these modifications have the potential to alter effects to historic properties. This highlights the importance of a definitive, consistent, and well-defined determination of the APE that accounts for all potential direct, indirect, and cumulative effects that may result from this undertaking. As the establishment of an APE is integral to successfully completing all additional steps in the Section 106 process, this must be addressed prior to moving forward.
Archaeology:
The current archaeological inventory report, submitted with the September 9, 2015 FHWA letter, states on p. 8 that *File and Literature Search and Preliminary Field Survey: Archaeological Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada* contains a more detailed presentation of the following information: (1) a detailed literature search from NVCRIS, the Nevada State Museum, the Bureau of Land Management-Carson City Office, historic records, and historic maps and (2) details on consultation regarding the Nationally Designated Trail corridors within the APE. The information provided in this referenced report should be either summarized in some form within the current archaeological report, or perhaps added as an appendix as it provides information necessary to review this current inventory report and the undertaking as a whole.

Architecture:
The SHPO notes, in our letter of August 31, 2015 to FHWA, that the historic context supports resources evaluated under National Register Significance Criteria A, B, and C, but that Significance Criterion D was not addressed for any of the architectural resources. At that time, the SHPO recommended “that the [architectural] resources identified within the APE remain unevaluated under Criterion D.” As this matter was not addressed by the federal agency in subsequent correspondence, the SHPO looks forward to receipt of FHWA determination regarding this matter.

If it would be helpful, SHPO staff would be happy to participate in a conference call to address any questions concerning this correspondence and undertaking.

Please feel free to contact this office should you have any questions concerning this correspondence, please contact Jessica Axsom at (775)684-3445 or by e-mail at jaxsom@shpo.nv.gov or SHPO staff architectural historian Mara Thiessen Jones at (775) 684-3439 or by e-mail at mara.jones@shpo.nv.gov.

Sincerely,

Julie H. Ernst, Ph.D., RPA
Deputy State Historic Preservation Officer
April 19, 2017

Ms. Rebecca Palmer  
State Historic Preservation Officer  
Nevada State Historic Preservation Office  
901 S. Stewart Street, Suite 5004  
Carson City, Nevada 89701-4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada  
Clarify the Authority under which the Undertaking Will Proceed for Section 106  
Compliance, and Request Concurrence on Area of Potential Effects for Historic  
Architectural and Archaeological Resources  
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);  
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

As you know, the Regional Transportation Commission of Washoe County (RTC), in  
cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of  
Transportation (NDOT) is preparing an Environmental Impact Statement (EIS) to evaluate  
effects from proposed improvements along Pyramid Highway from Queen Way to Calle de la  
Plata Drive, in Washoe County to improve the area’s traffic flow. The project also proposes to  
construct a new connection between US 395 and Pyramid Highway (SR 445) through the Sun  
Valley area in the northwestern portion of the Reno metro area.

We initiated consultation with the State Historic Preservation Officer (SHPO) for this  
undertaking in February 2009, and we have continued consultation with the SHPO regarding  
establishment of the area of potential effects (APEs), and eligibility and effect determinations for  
historic architectural and archaeological resources. We have also coordinated with your office in  
the development of a project-specific Programmatic Agreement (PA). Recently, we met with  
your staff on March 28, 2017 to provide an update on the project and outline a path for  
completion of the Section 106 process.

The purpose of this letter is to (1) clarify under which authority FHWA is proceeding with  
Section 106 consultation for the undertaking, and (2) conclude APE consultation for the  
undertaking. To that end, the following information is provided:

1. Address SHPO’s outstanding questions concerning:  
a. Under which authority the undertaking will proceed to comply with Section 106.
b. Whether the historic architecture direct and indirect APE accounts for the potential visual, audible, atmospheric, and cumulative effects of the undertaking.

2. Summarize the historic architecture direct and indirect APE and the archaeological APE established for the project and request SHPO’s formal concurrence.

**Authority under which the Undertaking Will Proceed**

In your October 14, 2015 letter, you asked FHWA to clarify under which authority the undertaking will proceed to comply with Section 106 – whether to finalize and follow the draft project-specific PA, to utilize the existing statewide Section 106 PA, or just follow standard Section 106 requirements as outlined in the Advisory Council on Historic Preservation’s regulations in 36 CFR 800. Based on the discussion in our March 28, 2017 meeting with the SHPO and NDOT, FHWA has decided that the undertaking will proceed under the statewide Section 106 PA titled, *Programmatic Agreement among the Federal Highway Administration, the Nevada Department of Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding implementation of Federal-Aid Transportation Projects in the State of Nevada (2014).* This decision is 1) based on the fact that the project-specific PA has not been fully executed, and the SHPO had additional comments on the PA that would require additional changes to the PA and vetting with PA signatories, which would have schedule implications; 2) based on where we are in the Section 106 process for this project since many of the deliverables and efficiencies outlined in the project-specific PA have been completed; and 3) based on the fact that the statewide PA addresses the Section 106 consultation needs of this project because it captures all parties that are pertinent to this undertaking (including the Bureau of Land Management [BLM] and the U.S. Army Corps of Engineers [USACE]), outlines responsibilities, etc., and largely follows the regulations (e.g., it does not establish expedited review processes or additional requirements).

**Historic Architecture APE Descriptions**

In your letters dated October 11, 2011, March 28, 2012, and August 31, 2012, you discussed the historic architecture APE; summarized the number of parcels included in the architectural APE; and noted that, had a buffering system been used to document the APE instead of a parcel system, perhaps fewer acres or properties would have been surveyed, and the APE would have been adequate for the scale and nature of the undertaking (36 CFR 800.16[d]). In your October 11, 2011 letter, you also noted that, at that time, you concurred with the architectural APE. Your August 31, 2012 letter further noted the following concerns that are addressed in this letter. Your comments have been enumerated to aid in following the discussion below.

1. **SHPO Comment #1**: Discrepancies between FHWA’s September 8, 2011 letter and the Architectural Inventory Report (revised June 2012) regarding the undertaking’s effect on new development. FHWA’s letter indicated that the project is not expected to induce development that would exceed the visual APE range, while the report indicated that further residential and commercial development on lands near and around the historic properties is anticipated because of increased accessibility offered by the highway improvements.
2. **SHPO Comment #2:** The Architectural Inventory Report (revised June 2012) states that there are other buildings, including a barn that were visible from the road and appear to be historically associated with the Trosi/Kiley Ranch, but are today outside of the parcel.

3. **SHPO Comment #3:** The Architectural Inventory Report (revised June 2012) states that the anticipated view shed alterations at the Trosi Family/Kiley Ranch will involve the introduction of a new intersection and transition from grade level to elevated highway west and northwest of the historic district (page 64).

4. **SHPO Comment #4:** Based on the above noted information, there appears to be additional, visible resources that were not included in the APE, given the proposed project description. SHPO will require a reevaluation of the APE for visual, audible, atmospheric, and cumulative effects.

5. **SHPO Comment #5:** In your October 14, 2015 letter to FHWA, you noted that both FHWA letters dated September 9, 2015 and September 28, 2015 made additional modifications to the project description and design, and that per the September 28, 2015 FHWA letter, these modifications have the potential to alter effects to historic properties.

Responses to your concerns are provided below. First, as requested by the SHPO in our March 28, 2017 meeting, a thorough description of the undertaking is attached to this letter (Attachment A) to inform your review of these responses and your review of the historic architecture direct and indirect APEs established for the undertaking. The undertaking description summarizes design changes made to the build alternatives between 2015 and early 2017, and describes and illustrates each of the four build alternatives (referred to as Arterial Alternatives) currently being evaluated in the Final EIS. Additionally, the attached maps illustrate the study area, the historic architecture direct and indirect APEs, and the location of the National Register of Historic Places (NRHP)-eligible historic districts discussed in this letter.

Regarding discrepancies noted under SHPO Comment #1 above, FHWA apologizes for the confusion. To clarify, while the Architectural Inventory Report did indicate that the project would result in further land development because of increased accessibility offered by the project, FHWA has a different opinion than that provided by the cultural resources subconsultant. FHWA has determined that the project is not expected to induce development that would expand the APE beyond its current boundaries for the reasons stated in our September 8, 2011 letter, which are summarized here: This project includes two types of roadway improvements – improvements to existing roads and construction of a new road (the US 395 Connector). The types of improvements proposed on existing roads include widening portions of Pyramid Highway and Disc Drive, adding short segments of auxiliary lanes along US 395 at the US 395/Parr Boulevard interchange, realigning Raggio Parkway and Dandini Boulevard, short extensions of West 1st and 2nd Streets in Sun Valley, minor improvements along Sun Valley Boulevard to accommodate the US 395 Connector, and adding bicycle and pedestrian facilities along Pyramid Highway, Disc Drive, and other roads in the vicinity of the US 395 Connector. Improvements also include improving Pyramid Highway as an access-controlled arterial, which includes improvements such as construction of a raised median to limit left-turn access, and modifying existing Pyramid Highway access points to right-in/right-out or eliminating access to Pyramid by terminating current access roads at Pyramid with cul-de-sacs. These proposed
improvements are compatible with surrounding zoning and future land uses. Future growth and
development would continue to be market driven and occur in accordance with local land use
restrictions regardless of whether this undertaking is implemented. Further, the new road
construction would generally occur on steeper slopes on BLM-owned property and/or zoned
open space. These areas are not likely to be developed in the reasonably foreseeable future due to
BLM and zoning development restrictions, as well as the costs associated with developing lands
on steep slopes, especially when commercial space is available along roads that would be
improved by the project.

Regarding SHPO Comments #2 through #4, it is FHWA’s understanding that the “other
buildings” referenced in the Architectural Inventory Report include those located east of the
Trosi/Kiley Ranch Historic District (SHPO Resource Number D94). FHWA has determined that
the proposed improvements along Pyramid Highway, which include a grade-separated
interchange at Pyramid Highway/Sparks Boulevard northwest of the Trosi/Kiley Ranch Historic
District, would be visually indistinguishable from the northwestern-most boundary of the
Trosi/Kiley Ranch Historic District (refer to historic architecture APE discussion later in this
letter for more information). Regarding the statement in the Architectural Inventory Report that
the view shed alterations at the ranch “will involve the introduction of a new intersection and
transition from grade level to elevated highway west and northwest of the historic district,” it is
correct that a grade-separated interchange at Pyramid Highway/Sparks Boulevard located
northwest of the ranch is still proposed, but grade-separated interchanges are no longer proposed
north of Sparks Boulevard. In that portion of the project, at-grade improvements are proposed,
including road widening, access changes, and signalized intersections that would not be visible
from the ranch due to its distance from the proposed improvements and area topography. Based
on the above, proposed improvements would be visually indistinguishable to buildings located
east of the ranch. Therefore, the historic architecture direct and indirect APE boundary located
at the eastern edge of the Trosi/Kiley Ranch Historic District adequately encompasses the visual
effects of the undertaking. If upon further evaluation additional outbuildings were to be included
in this historic district, or if the boundaries of the district were to extend farther to the north or
east, such changes would not alter the APE, the eligibility, or the effect of the project on this
property.

In response to SHPO comment #5, please note that design changes made to the build alternatives
have resulted in a reduced project footprint overall, and eliminated grade-separated interchanges
previously proposed on Pyramid Highway, north of Sparks Boulevard. The design changes have
essentially resulted in a narrowing/scaling down of the project, thus reducing visual impacts
overall. As such, effects to cultural resources have changed as a result of design changes – the
effects have been reduced. For example, due to design changes, the project would impact fewer
linear feet of the Prosser Valley Ditch (WA5234, WA6134 and SHPO Resource Number S820),
and the previously proposed grade-separated interchange at Pyramid Highway/Dolores Drive
west of the Sierra Vista Ranch Historic District (SHPO Resource Number D93) is no longer
proposed, reducing visual effects to that historic resource.
Reevaluation of the Historic Architecture Direct and Indirect APE

To address the SHPO’s concerns regarding the historic architecture direct and indirect APE, FHWA reevaluated that APE to confirm that it encompasses visual, audible, atmospheric, and cumulative effects of the undertaking.

Regarding your overall concerns about the historic architecture direct and indirect APE, as a result of design changes made after the 2013 Draft EIS, the Arterial Alternatives would have reduced visual and audible effects compared to the Build Alternatives evaluated in the Draft EIS. Also, all of the Arterial Alternatives maintain the same alignment as the Draft EIS build alternatives.

The visual effects of the undertaking were the main driver for determining the extent of the parcel-based direct and indirect historic architecture APE because visual impacts generally extend farther than auditory or atmospheric impacts. The air quality analysis conducted for the EIS found that none of the arterial alternatives would cause an exceedance of the U.S. National Ambient Air Quality Standards (NAAQS) established by the U.S. Environmental Protection Agency under authority of the Clean Air Act (42 U.S.C. 7401 et seq.) that apply for outdoor air throughout the country. Further, improved transportation operations under the arterial alternatives would result in improved air quality compared to the No Action Alternative. Therefore, this APE reevaluation focuses on visual effects of the undertaking to verify the appropriateness of the historic architecture direct and indirect APE boundary. The following discussion compares the detailed project description of the current undertaking (see Attachment A) against known historic properties to verify that the parcel-based direct and indirect APE limits are appropriately established and to illustrate the reduction in impacts to these resources.

Between Sparks Boulevard and Calle de la Plata, previously-proposed grade-separated interchanges on Pyramid Highway at Eagle Canyon Drive/La Posada Drive and Dolores Drive are no longer proposed (refer to Figure 1 in Attachment A). In this segment of Pyramid Highway, at-grade improvements include road widening, access changes at cross-streets, the addition of bicycle and pedestrian facilities, and traffic signal controls at the following intersections where no traffic signals currently exist:

- Calle de la Plata: Full movement signalized intersection with reconfigured lanes.
- Egyptian Drive/Sunset Springs Lane: Full movement signalized intersection with reconfigured lanes
- Dolores Drive: Full movement, signalized intersection with reconfigured lanes.

Traffic signal poles and roadway light poles would introduce new vertical visual elements at the above-listed intersections, and introduce new sources of light during nighttime hours. Vertical elements that currently exist along Pyramid Highway include commercial and residential developments, as well as power poles, power lines, and roadway signage along the road. These vertical elements located along Pyramid Highway and farther distant from the roadway currently produce light impacts during nighttime hours. Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.
Sierra Vista Ranch Historic District: All Arterial Alternatives would result in reduced visual effects to the Sierra Vista Ranch Historic District due to the elimination of the previously proposed grade-separated intersection at Pyramid Highway and Dolores Drive. Instead, the intersection would remain at-grade and traffic signals with street lights would be added. The proposed feeder road running southeast from the new intersection would still be provided under the design changes made. Before design changes were made, the proposed improvements would have introduced new visual elements into the setting of the site. However, these visual and audible effects were determined to be avoided by modifying the design to include the planting of one or more lines of trees along the western boundary of the district to form a living visual barrier between the district and Pyramid Highway. The recent design changes include elimination of the grade-separated Pyramid/Dolores interchange and installing traffic signals. Based on their height and thinness, street lights would not be visually distinguishable beyond approximately 800 feet. The northwestern-most boundary of the Sierra Vista Ranch Historic District is located approximately 1,890 feet from the Dolores Drive/Pyramid intersection, which is well beyond the point where traffic signals and lighting would be visually distinguishable. Therefore, the indirect APE in this area is adequate.

Trosi Family/Kiley Ranch Historic District: All the Arterial Alternatives have Pyramid Highway crossing over Sparks Boulevard. Interchange entry and exit ramps would provide access between Pyramid Highway and Sparks Boulevard. The proposed Pyramid Highway bridge roadway surface is 25 feet above the Sparks Blvd roadway surface. This elevation represents the maximum roadway height over the existing ground at this location. The thickness of the bridge is 8 feet, allowing for the standard 16 feet of clearance. The elevation of Sparks Boulevard would remain at the existing grade. The edges of the bridge would be lined with a 42-inch-tall solid concrete railing, according to NDOT standard.

Lighting: NDOT typically uses Type 7 Poles for this type of interchange. The height of the pole is 32 feet 4 inches above the roadway surface. Three poles would be placed at each ramp gore for a total of 12 poles. Additional poles would be placed along Sparks Blvd and Highland Ranch Pkwy prior to the interchange intersections similar to what is present today. There would be no lights on the bridge itself and given the rural residential location, high mast lighting is not anticipated. The approximate heights of the light poles for the ramps at their proposed location above the existing ground would be as follows:
- Northbound off-ramp: 52 feet
- Northbound on-ramp: 50 feet
- Southbound off-ramp: 41 feet
- Southbound on-ramp: 43 feet

The heights given account for both the pole height and proposed roadway improvements and represent the tallest elements at the interchange.

Two traffic signals would be installed – one at each interchange intersection. Each of the signal poles would include a street light on the top. These poles would be similar in height to the Type 7 poles. The elevation of the signals and lights would be very similar to those at the existing Sparks Boulevard intersection.
Signing: The project would include signing in advance of the interchange. Overhead signs would be placed prior to the ramp exits. The tops of these signs would be approximately 25 feet above the roadway surface.

Below is a visual approximation of how the proposed Pyramid Highway/Sparks Boulevard grade-separated interchange would appear as viewed from the northwestern boundary of the Trosi/Kiley Ranch Historic District located approximately 800 feet southeast of the proposed interchange:
As shown in the visual simulation above, the interchange would be visually indistinguishable from the northwestern boundary of the ranch located approximately 800 feet southeast of the interchange. Therefore, the proposed interchange would be visually indistinguishable from the northernmost buildings within the district that are located approximately 1,165 away from the interchange. As such, the proposed interchange would be visually indistinguishable from areas east of the Troisi/Kiley Ranch Historic District as well.

Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.

**Iratacal Farm Historic District:** Proposed improvements with the potential to result in visual effects to this district include widening along Disc Drive and construction of a Disc Drive/US 395 Connector interchange.

Below is the view from the northern portion of the district toward Disc Drive, located approximately 1,260 feet north of the district. As shown, Disc Drive is visually indistinguishable from the district. Therefore, the at-grade improvements proposed along Disc Drive would not be visible from the district:
Below is the view from the northern portion of the district toward the Pyramid Highway/Disc Drive intersection, located approximately 5,500 feet west-northwest of the district. As shown, the intersection is currently visually indistinguishable from the district. Based on the Pyramid/Sparks Boulevard grade-separated interchange visual simulation that illustrates that the interchange is visually indistinguishable from approximately 800 feet away, a grade-separated Pyramid Highway/Disc Drive interchange would be visually indistinguishable from the Iratcabal Farm Historic District located over one mile east of the proposed interchange.
Due to the existing vertical elements and nighttime light effects, the proposed indirect APE is adequate.

Summary of Historic Architecture and Archaeological APEs

- The historic architecture direct APE includes the footprint for all arterial alternatives. The historic architecture indirect APE includes adjacent parcels and parcels that might be visually, audibly, or cumulatively impacted by the project. This parcel-based APE extends from the direct impact footprint in areas where above-grade improvements such as grade-separated interchanges are proposed that could potentially result in visual impacts. The indirect APE encompasses indirect effects, including potential visual, audible, atmospheric, and cumulative effects of the undertaking. The direct and indirect APEs are shown on the attached maps.

- The direct archaeological APE consists of the footprint of the identified Preferred Alternative plus a 100-foot buffer on both sides of the footprint to account for minor design changes that may occur during final design and temporary construction easements. The Preferred Alternative will be identified once the Final EIS updates are completed, which is anticipated to occur end of May or June 2017.

We request your concurrence with the archaeological APE described above, and the historic architecture direct and indirect APE described above and shown on the attached figures. This information has been forwarded concurrently to the following consulting parties for review:
Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California. We will notify you of any responses received from these groups.

If you have any questions please contact me at 775-888-7666.

Sincerely,

C. Cliff Creger
Chief Cultural Resources Program Manager

Enclosures:
Attachment A: Description of Undertaking
Attachment B: Map of Study Area, APE, and NRHP Eligible Historic Architecture Resources

cc: Abdelmoez Abdalla, FHWA
    Jin Zhen, FHWA
    Dale Wegner, FHWA
    Greg Novak, FHWA
    Pyramid Lake Paiute Tribe
    Reno-Sparks Indian Colony
    Washoe Tribe of Nevada and California
    Doug Maloy, RTC
    Jim Clarke, Jacobs
Attachment A – Description of Undertaking
Pyramid Highway/US 395 Connector: Description of Undertaking

This document summarizes project changes that occurred after the Draft Environmental Impact Statement (Draft EIS) was distributed in August 2013 that lead to the design changes made to the build alternatives that are being fully evaluated in Final EIS. The project changes include reductions in forecasted traffic as a result of updated traffic data that became available after the Draft EIS, and the build alternatives reevaluation and rescreening that was conducted and design changes made as a result of the reduced traffic forecasts. The most notable design changes made to the build alternatives after the Draft EIS was distributed include changing the proposed roadways from freeway-type facilities to arterial-type facilities, reducing the build alternative footprints in some areas, and eliminating some grade-separated interchanges previously proposed under the build alternatives evaluated in the Draft EIS. Under the design changes, all of the build alternatives follow the same alignments.

PROJECT CHANGES MADE AFTER THE AUGUST 2013 DRAFT EIS

Revised Traffic Forecasts

While the Preferred Alternative was being identified and vetted after reviewing and consideration of comments received on the Draft EIS, RTC was adopting a new regional traffic model. This new model used updated population and employment projections from a new Consensus Forecast from the Truckee Meadows Regional Planning Agency that replaced the Interim Consensus Forecast (ICF) used for the Draft EIS traffic analysis. In general, the population and employment in the region were forecasted to be lower, and the areas of population and employment growth changed to be more consolidated than the prior ICF estimates. As a result, the forecasted volumes from the updated travel demand models were also generally lower than the previously forecasted volumes documented in the Draft EIS.

The reduction in traffic forecasts was significant enough for the Study team to revisit the design of the build alternatives. It was found that the reduced traffic demand changed the type of highway facility needed to address the purpose and need of the project. The Study team concluded that an arterial facility in lieu of a freeway facility (which was included in the build alternatives evaluated in the Draft EIS) could provide adequate capacity for the projected traffic volumes. Because the design criteria for an arterial facility are different than those required for a freeway facility, the Study team modified the design criteria for the build alternatives to that of an arterial facility, including the cross-section width, design speed, access control, and acceptable grades. This effort resulted in a cumulative reduction in the footprint of the build (“freeway”) alternatives that were fully evaluated in the Draft EIS.

Design speeds for arterial facilities are typically lower than those associated with a freeway, allowing for a tighter geometric design. Therefore, the design speed for the “arterial” type build alternatives was modified. The build alternatives now include a design speed of 55 miles per hour (mph) for Pyramid Highway, 60 mph design speed for the US 395 Connector, and 45 mph design speed for the Disc Drive Extension. These slight reductions to the design speeds allowed for development of a narrower roadway, which would reduce impacts and costs.

A traffic analysis was then conducted for each intersection to confirm if grade-separated interchanges were still necessary. Under all revised build (“arterial”) alternatives, all previously proposed grade-separated interchanges along Pyramid Highway north of Sparks Boulevard were deemed unnecessary and were eliminated. All the arterial alternatives would still require grade-separated interchanges at: US 395, at or near Sun Valley Boulevard, and Highland Ranch.
Parkway/Sparks Boulevard. The revised off alignment and ridge alignment (Arterial Alternatives 1 and 3, respectively) each would require a directional interchange where they connect with Pyramid Highway. The revised on alignment (Arterial Alternatives 2 and 4) would require additional interchanges at Disc Drive, Los Altos Parkway, Golden View Drive, and Sparks Boulevard.

All previously proposed frontage roads along Pyramid Highway were also eliminated.

The following sections describe the four build alternatives (referred to as Arterial Alternatives) that were modified after the Draft EIS as a result of reduced traffic forecasts.

**Arterial Alternatives – Common Elements**

Each of the Arterial Alternatives would improve 7.7 miles of Pyramid Highway from Queen Way north to Calle de la Plata Drive through the communities of Sparks and Spanish Springs. The alternatives differ regarding alignments for the new east-west US 395 Connector, US 395 Connector interchange locations, and road cross-sections through parts of the Study Area.

In addition to road improvements, each Arterial Alternative includes bicycle and pedestrian facilities; increased transit services, including park-and-rides; and Intelligent Transportation Systems (ITS). ITS uses advanced applications of electronics and communications, such as enhanced traveler information and variable message signs, to improve traffic operations and increase roadway effectiveness. North of Sparks Boulevard, all Arterial Alternatives follow the same alignment along the existing Pyramid Highway. Figure 1 shows the elements common to all Arterial Alternatives.

**Roadway Improvements**

Each Arterial Alternative would include a new arterial facility and ancillary improvements from Pyramid Highway to US 395, through the Sun Valley area. Arterial improvements are designed to carry traffic directly to US 395 via the US 395 Connector rather than along the existing Pyramid Highway to McCarran Boulevard. Both the US 395 Connector and Pyramid Highway segments north to Calle de la Plata Drive would be constructed as a high speed, access controlled primary arterial highways with a combination of interchanges and at-grade intersections at certain major intersecting roadways. Note that the term “high speed” refers to a design speed of over 45 mph.

Arterial design elements along Pyramid Highway include installing a raised median island to separate directions of travel and limit left-turn access. The US 395 Connector includes an unpaved median, and barrier rail only at select locations where required to meet clear zone distances. Immediately east of US 395, all the arterial alternatives would include barrier rail on both the outside shoulders and in the median, mostly due to topographic constraints.

The existing US 395/Parr Boulevard service interchange would be reconstructed and reconfigured to accommodate a new directional system interchange for the US 395 Connector. Raggio Parkway, Dandini Boulevard, and Spectrum Drive would be realigned in this area to accommodate the interchange improvements and provide improved access to the DRI and TMCC campuses.
Each Arterial Alternative would have the following cross-sections:

- Four-lane arterial
  - Along Pyramid Highway between Calle de la Plata and Eagle Canyon Drive/La Posada Drive.
• Six-lane arterial
   Along Pyramid Highway between Eagle Canyon Drive/La Posada Drive and Sparks Boulevard/Highland Ranch Parkway.
   Along Pyramid Highway between Disc Drive and Queen Way. The proposed lanes would match the improvements currently being constructed for the Pyramid Highway/McCarran intersection under a separate project.
   Along Disc Drive between Pyramid Highway and Sparks Boulevard.

• Five-lane Arterial
   Along Disc Drive between Sparks Boulevard and Vista Boulevard

Each Arterial Alternative would include grade-separated interchanges at the following locations:

• Sparks Boulevard/Highland Ranch Parkway: diamond interchange.

To accommodate the proposed Pyramid Highway improvements, each Arterial Alternative would modify the following major roadway accesses at Pyramid Highway, listed north to south:

• Calle de la Plata: Full movement signalized intersection with reconfigured lanes.
• Egyptian Drive/Sunset Springs Lane: Full movement signalized intersection with reconfigured lanes.
• West Sky Ranch Boulevard: Eliminates left turn access; change to right-in/right-out access only.
• Eagle Canyon Drive/La Posada Drive: Full movement, signalized intersection with reconfigured lanes.
• Robert Banks Boulevard: Eliminates left turn access; change to right-in/right-out access only.
• David James Boulevard: Eliminate Pyramid Highway access and build cul-de-sac because of proximity to Dolores Drive.
• Dolores Drive: Full movement, signalized intersection with reconfigured lanes.
• Lazy 5 Parkway: Full movement, signalized intersection with reconfigured lanes.
• Kiley Parkway: Eliminate Pyramid Highway access and build cul-de-sac because of proximity of the Sparks Boulevard interchange.
• Disc Drive: Full movement, signalized intersection with reconfigured lanes to accommodate improvements.

In addition to access changes at major roadways, access to Pyramid Highway will be changed to right-in/right-out only at the following locations:

• Commercial driveways just north of Eagle Canyon Road
• Driveways between Robert Banks Boulevard and Eagle Canyon Drive
• Various driveways between Lazy 5 Parkway and Tierra del Sol
The existing right-in/right-out access at Tierra Del Sol Parkway and Spanish Springs Library will be maintained. Minor changes will be made at these locations as necessary to tie into the improved Pyramid Highway.

Changes to commercial access along Disc Drive east of Pyramid Highway are also common to all arterial alternatives. These changes include eliminating left-turn access to the shopping center located on the north side of Disc Drive between Sparks Boulevard and Vista Boulevard; driveways will become right-in/right-out access only.

Each Arterial Alternative would include construction of auxiliary lanes on US 395 between the US 395 Connector and McCarran Boulevard.

Each Alternative would also eliminate the existing Dandini Drive connection to Sun Valley Boulevard and provide new connections between Raggio Parkway and Sun Valley Boulevard by extending West 1st Avenue and West 2nd Avenue to the west to intersect Raggio Parkway.

**Bicycle and Pedestrian Improvements**

Each Arterial Alternative would include construction of a shared-use path along Pyramid Highway between Calle de la Plata and Disc Drive. This path would continue west from Disc Drive to Sun Valley Boulevard along the US 395 Connector alignment. At Sun Valley Boulevard, the shared-use path would separate from the US 395 Connector and be accessed using the existing local street facilities along Sun Valley Boulevard and Dandini Drive. The shared-use path continues west as an extension of Dandini Drive just west of Sun Valley Boulevard to the intersection of Raggio Parkway and Dandini Drive. Bike lanes and sidewalks on both Raggio Parkway and Dandini Drive would be provided to allow bicyclists and pedestrians access to the TMCC, DRI campuses, and Parr Boulevard. These facilities would improve existing connectivity because Dandini Drive does not currently provide bike lanes or sidewalks.

Other bicycle and pedestrian improvements would occur along the extensions of West 1st and 2nd Avenues. Both of these streets would be repaved, restriped for bike lanes, and sidewalks provided as required to comply with the Americans with Disabilities Act (ADA).

**Transit Improvements**

Each Arterial Alternative would include the addition of regional bus service along Pyramid Highway and Prater Boulevard between Calle de la Plata and the RTC Centennial Plaza, to serve corridor demand consistent with the service standards of RTC. The arterial alternatives also would include construction of transit/carpool lots near the Pyramid Highway alignment at Calle de la Plata, Eagle Canyon Drive/La Posada Drive, and Los Altos Parkway. At Calle de la Plata, the lot would be located in the southeast quadrant of the intersection; at Eagle Canyon/La Posada Drive, the lot would be located in the southeast quadrant of the intersection; at Los Altos, the lot would be shared with the Walmart parking lot, requiring coordination with Walmart. If Walmart does not agree to share the parking lot, an alternate site may be identified during final design.

**Bridges**

Each Arterial Alternative would include construction of many structures in the Study Area. Bridges and retaining walls would be built or modified to accommodate the proposed improvements. Bridges would be required at each interchange along the corridor. The bridges included in each Arterial Alternative are listed below. Because of the high number of bridges and the design effort required for each, bridge design will continue during final design.
The proposed bridges are listed below in order, beginning at the US 395 interchange in the western portion of the study area, then moving east toward Pyramid Highway, then moving north along Pyramid Highway to Call de la Plata.

- **Bridges Common to all Arterial Alternatives**
  - US 395 Interchange at Parr Boulevard
    - Parr Boulevard over US 395 (replacement of existing structure)
    - Raggio Parkway over NE Ramp (NE = North to East)
    - WS Ramp over US 395
    - WS Ramp over Raggio Parkway
    - WS Ramp over R-1 Ramp (On ramp from Parr Boulevard/Raggio Parkway to the US 395 Connector.
    - WS Ramp over P-2 Ramp (Parr service interchange north off ramp)
  - Pyramid arterial over Sparks Boulevard

- **Arterial Alternative 1 (Total Structures for Alternative 1 = 12)**
  - Raggio Parkway over US 395 Connector arterial
  - US 395 Connector arterial over Sun Valley Boulevard
  - US 395 Connector arterial over Leon Drive
  - US 395 Connector arterial over Disc Drive westbound on ramp
  - US 395 Connector Py-2 (Southbound off ramp to Pyramid)

- **Arterial Alternative 2 (Total Structures for Alternative 2 = 14)**
  - Raggio Parkway over US 395 Connector arterial
  - US 395 Connector arterial over Sun Valley Boulevard
  - Northbound Direct Connect ramp over US 395 Connector arterial
  - Northbound Direct Connect ramp over Pyramid arterial
  - Pyramid arterial over Los Altos Drive
  - Northbound Direct Connect ramp over Los Altos Parkway
  - Southbound Direct Connect ramp over Los Altos Parkway

- **Arterial Alternative 3 (Total Structures for Alternative 3 = 11)**
  - West Sun Valley Interchange:
    - Raggio Parkway over US 395 Connector arterial
  - US 395 Connector arterial over Sun Valley Boulevard
  - US 395 Connector arterial over Disc Drive westbound on ramp
  - US 395 Connector arterial Py-2 (Southbound off ramp to Pyramid)

- **Arterial Alternative 4 (Total Structures for Alternative 4 = 15)**
  - West Sun Valley Interchange:
    - Raggio Parkway over US 395 Connector arterial
  - US 395 Connector arterial over Sun Valley Boulevard
  - US 395 Connector freeway over Leon Drive
  - Northbound Direct Connect ramp over US 395 Connector arterial
  - Northbound Direct connect ramp over Pyramid arterial
  - Pyramid arterial over Los Altos Drive
  - Northbound Direct Connect ramp over Los Altos Parkway
  - Southbound Direct Connect ramp over Los Altos Parkway
Retaining Walls, Traffic Noise Barriers, and Screening Walls

Retaining walls would be constructed where necessary along the corridor to allow construction of the interchanges or to eliminate or minimize impacts. Table 2 lists proposed retaining wall locations at the current level of preliminary design. The exact location and design of retaining walls will be determined during final design.

Traffic noise barriers would be constructed to mitigate traffic noise impacts per regulation and policy. Recommendations for traffic noise barriers will be made once the traffic noise analysis being conducted for the Final EIS is completed.

Screening walls would be constructed to mitigate visual impacts in Environmental Justice (low-income and minority populations) areas caused by construction of proposed roadway improvements, if such screening walls are supported by the affected neighborhoods. Visual screening also could be provided by earthen berms built using excess earthwork material. This visual screening also might provide some traffic noise reduction.

Water Quality and Drainage Improvements

Each Arterial Alternative would include construction of water quality and drainage improvements. These would include the construction, or replacement, of culverts, inlets, and ditches along the impacted roadways, as well as the construction of permanent water quality basins. The number of facilities required by the Arterial Alternatives is summarized below.

<table>
<thead>
<tr>
<th>Arterial Alternative</th>
<th>Culverts</th>
<th>Ditches</th>
<th>Water Quality Ponds—Number (Cumulative Approximate Acres-Feet)</th>
<th>Ditch/Channel Relocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative 1</td>
<td>37</td>
<td>23</td>
<td>10 (54)</td>
<td>1</td>
</tr>
<tr>
<td>Alternative 2</td>
<td>24</td>
<td>22</td>
<td>11 (55)</td>
<td>2</td>
</tr>
<tr>
<td>Alternative 3</td>
<td>34</td>
<td>28</td>
<td>10 (57)</td>
<td>1</td>
</tr>
<tr>
<td>Alternative 4</td>
<td>27</td>
<td>21</td>
<td>11 (54)</td>
<td>2</td>
</tr>
</tbody>
</table>

In general, water quality ponds would be located at existing low-lying areas along the Arterial Alternatives. These existing low areas include near the US 395 interchange, in Sun Valley, near the south end of Wedekind Park, along Disc Drive, near Kiley Parkway, north of Lazy 5 Parkway, and south of Eagle Canyon/La Posada Drive.
<table>
<thead>
<tr>
<th>Interchange</th>
<th>Arterial Alternative</th>
<th>Location</th>
<th>Approx. Length</th>
<th>Approx. Average Height</th>
<th>Approx. Maximum Height</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 395/ Parr Blvd./ US 395 Connector System Interchange</td>
<td>All Arterial Alts.</td>
<td>Along Parr service southbound on-ramp</td>
<td>380 feet</td>
<td>16 feet</td>
<td>37 feet</td>
<td>This wall has significant variations in height due to the grading of the surrounding properties. Placed to minimize right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along US 395 westbound to southbound system on-ramp</td>
<td>450 feet</td>
<td>5 feet</td>
<td>10 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along southbound US 395 just north of Sutro Street</td>
<td>640 feet</td>
<td>10 feet</td>
<td>15 feet</td>
<td>Placed to minimize right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Along southbound US 395 at ramp bridge</td>
<td>260 feet</td>
<td>22 feet</td>
<td>22 feet</td>
<td>Placed along bridge abutment.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Between two ramps</td>
<td>850 feet</td>
<td>12 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td>Sun Valley</td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R1 ramp</td>
<td>1420 feet</td>
<td>18 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R2 ramp</td>
<td>420 feet</td>
<td>6 feet</td>
<td>13 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 1</td>
<td>Along Sun Valley R4 ramp</td>
<td>1175 feet</td>
<td>10 feet</td>
<td>16 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R1 ramp</td>
<td>425 feet</td>
<td>33 feet</td>
<td>48 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R2 ramp</td>
<td>295 feet</td>
<td>5 feet</td>
<td>8 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R3 ramp</td>
<td>400 feet</td>
<td>20 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Along Sun Valley R4 ramp</td>
<td>750 feet</td>
<td>30 feet</td>
<td>42 feet</td>
<td>Placed to separate grade differential between ramps</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 2</td>
<td>Sun Valley south of Rampion Way Crossing at Leonesio Drive</td>
<td>256 feet</td>
<td>10 feet</td>
<td>18 feet</td>
<td>Placed to avoid right-of-way acquisition.</td>
</tr>
<tr>
<td></td>
<td>Arterial Alt. 3</td>
<td>Wall along R3 ramp</td>
<td>660 feet</td>
<td>30 feet</td>
<td>35 feet</td>
<td>Wall to avoid impacts to the Prosser Valley Ditch</td>
</tr>
<tr>
<td></td>
<td>All Arterial Alts.</td>
<td>Wall along W. 1st Avenue at Lois Allen Elementary School for the West of Sun Valley Interchange</td>
<td>320 feet</td>
<td>11 feet</td>
<td>19 feet</td>
<td>Minimizes impacts to the playground area and driveway access to Lois Allen Elementary School.</td>
</tr>
<tr>
<td>Interchange</td>
<td>Arterial Alternative</td>
<td>Location</td>
<td>Approx. Length</td>
<td>Approx. Average Height</td>
<td>Approx. Maximum Height</td>
<td>Comments</td>
</tr>
<tr>
<td>-------------</td>
<td>----------------------</td>
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<td>------------------------</td>
<td>------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>All Arterial Alts.</td>
<td>Wall along shared-use path</td>
<td>315 feet</td>
<td>15 feet</td>
<td>28 feet</td>
<td>Wall to avoid large cut</td>
<td></td>
</tr>
<tr>
<td>Arterial Alt. 1</td>
<td>Wall behind Walmart</td>
<td>435 feet</td>
<td>24 feet</td>
<td>40 feet</td>
<td>Wall height varies significantly to mitigate impacts to existing cut slope behind Walmart.</td>
<td></td>
</tr>
<tr>
<td>Arterial Alts. 1 and 3</td>
<td>Pyramid Highway between Disc Drive and Los Altos Parkway</td>
<td>610 feet</td>
<td>4 feet</td>
<td>6 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
<td></td>
</tr>
<tr>
<td>Arterial Alts. 1 and 3</td>
<td>Pyramid Highway south of Golden View</td>
<td>800 feet</td>
<td>8 feet</td>
<td>12 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
<td></td>
</tr>
<tr>
<td>Arterial Alts. 2 and 4</td>
<td>Wall along Pyramid Highway north of Golden View Drive</td>
<td>860 feet</td>
<td>6 feet</td>
<td>13 feet</td>
<td>Placed to minimize right-of-way acquisition.</td>
<td></td>
</tr>
<tr>
<td>Arterial Alts. 2 and 4</td>
<td>Seven individual walls along Los Altos Ramps</td>
<td>Varies</td>
<td>Varies</td>
<td>Varies</td>
<td>All Walls Placed to separate grade differential between ramps</td>
<td></td>
</tr>
<tr>
<td>Arterial Alts. 2 and 4</td>
<td>Wall along Disc NB direct connect ramp</td>
<td>280 feet</td>
<td>17 feet</td>
<td>35 feet</td>
<td>Placed to separate grade differential between ramps</td>
<td></td>
</tr>
<tr>
<td>Arterial Alts. 2 and 4</td>
<td>Wall along Disc NB direct connect ramp</td>
<td>310 feet</td>
<td>15 feet</td>
<td>30 feet</td>
<td>Placed to separate grade differential between ramps</td>
<td></td>
</tr>
<tr>
<td>All Arterial Alts.</td>
<td>Pyramid Highway just north of Queen Way</td>
<td>200 feet</td>
<td>6 feet</td>
<td>6 feet</td>
<td>This wall protects against impacts to the Orr Ditch</td>
<td></td>
</tr>
<tr>
<td>All Arterial Alts.</td>
<td>Pyramid Highway just south of Wedekind Park</td>
<td>500 feet</td>
<td>15 feet</td>
<td>28 feet</td>
<td>Placed to avoid right-of-way acquisition</td>
<td></td>
</tr>
<tr>
<td>All Arterial Alts.</td>
<td>Disc Drive between Sparks Boulevard and Vista Boulevard, south side</td>
<td>1200 feet</td>
<td>6 feet</td>
<td>10 feet</td>
<td>This wall will likely be higher than indicated but any additional height will be used as a traffic noise barrier instead of a retaining wall. Placed to avoid right-of-way acquisition.</td>
<td></td>
</tr>
</tbody>
</table>
Earthwork

Earthwork refers to the excavation and embankment of earth associated with construction. At this time, specific locations for temporary or permanent storage of excess material have not been identified. It is anticipated that much of the material can be stockpiled or disposed of throughout the project limits using a variety of methods and concepts. Off-site hauling of excess material is an option but would increase the overall project cost. Concepts for handling or reducing excess material include:

- Using excess material within other areas within the project limits where fill material is needed.
- Flattening major fill slopes along roadways as a way to increase reuse of excess material.
- Steepening cut slopes along roadways where material is found to be stable.
- Placing material along roadside shoulders to create visual screening barriers.
- Placing material within the infield areas between ramps of areas at interchanges.
- Placing material in support of third party master plan developments.
- Using material to develop and advance proposed regional parks.
- Infilling expended portions of material pits located near the project limits.
- Refining roadway alignment elevations as part of future designs.
- Placing walls in strategic locations to reduce major cuts.

Arterial Alternative Elements in Addition to Common Elements

This section describes elements of each arterial alternative in addition to those described under Common Elements. For reference, Table 3 summarizes the major design elements of each Arterial Alternative.

<table>
<thead>
<tr>
<th>Design Element</th>
<th>Arterial Alt. 1</th>
<th>Arterial Alt. 2</th>
<th>Arterial Alt. 3</th>
<th>Arterial Alt. 4</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Alignment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Off Alignment</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>On Alignment</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Ridge Alignment</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td><strong>Interchange in Sun Valley</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sun Valley Interchange</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>West Sun Valley Interchange</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td><strong>Sun Valley Boulevard Crossing Location</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>North Crossing (Rampion Way)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Crossing (south of Rampion Way)</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
Arterial Alternative 1

Arterial Alternative 1 shown on Figure 2 would be an off alignment just west of the existing Pyramid Highway between the US 395 Connector and Highland Ranch Parkway. This alignment would be located just below the ridgeline of the mountains, west of Walmart. Of the two alternative alignments through Sun Valley, Arterial Alternative 1 would follow the more northern Rampion Way crossing and would include an interchange at Sun Valley Boulevard. For the length of the arterial segment from Highland Ranch Parkway and along the new US 395 connector to US 395, the typical cross-section would be a four-lane arterial, with auxiliary and/or truck lanes provided where warranted by travel demand or grade.

Changes to the local street network in Sun Valley are required as part of the Arterial Alternative 1 and include the widening of Sun Valley Boulevard, the elimination of Rampion Way, and the extension of Leon Drive north to East 1st Avenue. Some driveways along Sun Valley Boulevard would be modified to right-in/right-out only as a result of raised median islands to accommodate the interchange improvements.

Arterial Alternative 1 would have three interchanges, in addition to those common to all alternatives, at the following locations:

- Sun Valley Boulevard: diamond interchange
- Disc Drive: directional interchange
- Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway (existing alignment): directional interchange

Along the existing Pyramid Highway alignment south of Sparks Boulevard/Highland Ranch Parkway to Los Altos Parkway, Pyramid Highway would remain a four-lane arterial, but would be modified by installing a raised median island to limit left turns from driveways and cross streets. Driveways affected include those to the Blue Gem and Oasis Mobile Estates mobile home parks as well as the First Baptist Church. Access to Spring Ridge Drive would be changed to right-in/right-out. South of Los Altos Parkway, existing Pyramid Highway would be upgraded to a six-lane arterial to Disc Drive, again with limited left turn movements. The existing southerly access to the Wal-Mart and at Shoppers Square would remain with slight modifications made to connect to the arterial improvements.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 2 Arterial Alternative 1
Arterial Alternative 2

Arterial Alternative 2 shown on Figure 3 would be an alignment following the existing Pyramid Highway between the US 395 Connector and Sparks Boulevard/Highland Ranch Parkway. This alignment would include a six-lane, limited access, arterial cross-section on Pyramid Highway between Sparks Boulevard/Highland Ranch Parkway and Disc Drive. The US 395 Connector would consist of a four-lane arterial cross-section between Disc Drive and US 395 with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector alignment would cross Sun Valley south of Rampion Way and would include an interchange at Sun Valley Boulevard.

Arterial Alternative 2 would have three interchanges, in addition to those common to all alternatives, at the following locations:

- Los Altos Parkway: diamond interchange
- Disc Drive at Pyramid Highway: at-grade intersection with directional ramps to northbound and from southbound Pyramid Highway tying into the US 395 Connector. These directional ramps bypass traffic from the Disc Drive intersection.
- Sun Valley Boulevard: diamond interchange

Access changes to driveways and local streets along existing Pyramid Highway are required as a part of this alternative. The existing Spring Ridge Drive access to Pyramid Highway would be eliminated and two new accesses at the north and south ends of Dorchester Drive would be provided. Other access changes are required to accommodate the mobile home communities east of Pyramid Highway, and include providing a new access road along the frontage of Pyramid Highway to access the Oasis Mobile Estates mobile home park.

Farther south, the southerly access to the Wal-Mart shopping center and the access to Shoppers Square would be eliminated.

Some driveways along Sun Valley Boulevard would be modified to right-in/right-out only as a result of both the widening of Sun Valley Boulevard and the placement of raised median islands to accommodate the interchange improvements. Both West and East Leonesio Drives on the west side of Sun Valley would be cul-de-saced on both sides of the new US 395 Connector.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 3  Arterial Alternative 2
Arterial Alternative 3

Arterial Alternative 3 shown on Figure 4 would be an alignment along the ridgeline of the mountains between the US 395 Connector and Highland Ranch Parkway. The US 395 Connector would cross Sun Valley south of Rampion Way and include a diamond interchange immediately west of Sun Valley Boulevard at Raggio Parkway. The US 395 Connector would consist of a four-lane arterial cross-section with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector would cross Sun Valley south of Rampion Way and would include an interchange west of Sun Valley Boulevard.

Aside from the interchange west of Sun Valley Boulevard, this alignment would include two additional interchanges; a directional interchange at the extension of Disc Drive and a directional system interchange with Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway.

Improvements and access changes along existing Pyramid Highway south of Sparks Boulevard/Highland Ranch Parkway to Disc Drive would be the same as those described under Arterial Alternative 1. In Sun Valley, both West and East Leonesio Drives in Sun Valley would be terminated with cul-de-sacs on both sides of the new US 395 Connector.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 4  Arterial Alternative 3
Arterial Alternative 4

Arterial Alternative 4 shown on Figure 5 would be an alignment following the existing Pyramid Highway between Sparks Boulevard/Highland Ranch Parkway and the US 395 Connector; the same alignment as Arterial Alternative 2. This alignment would include a six-lane, limited access, arterial cross section located on Pyramid Highway between the Sparks Boulevard/Highland Ranch Parkway intersection and Disc Drive. The US 395 Connector would consist of a four-lane arterial cross-section between Disc Drive and US 395 with auxiliary and truck lanes provided where warranted by traffic demand or roadway grade. The US 395 Connector alignment would follow the more northern Rampion Way crossing of Sun Valley and would include an interchange immediately west of Sun Valley Boulevard at Raggio Parkway.

Like Arterial Alternative 2, this alternative includes three additional interchanges at Los Altos Parkway, Disc Drive, and west of Sun Valley Boulevard.

Access changes along Pyramid Highway are similar to Arterial Alternative 2. Access changes in Sun Valley are similar to those under Arterial Alternative 1, except that there would be no impacts to existing driveways because no widening along Sun Valley Boulevard would occur.
Note: See Figure 1 for elements common to all Arterial Alternatives.

Figure 5  Arterial Alternative 4
May 18, 2017

Mr. C. Cliff Creger
Cultural Resources Program Manager
Environmental Services
Nevada Department of Transportation
1263 South Stewart Street
Carson City, NV 89712

Re: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada.
EA #73390 & 73391/NDOT # WA11-009/FHWA #DE-0191(065) & DE-019(067)
Undertaking 2010-0884

Dear Mr. Creger:

The Nevada State Historic Preservation Office (SHPO) has reviewed the subject documents received April 19, 2017 in accordance with the Programmatic Agreement Among the Federal Highway Administration, the Nevada Department of Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Implementation of Federal-Aid Transportation Projects in the State of Nevada (PA).

Area of Potential Effect (APE)

Direct APE:
While the SHPO is foreseeing concurring on the direct APE described and illustrated in the submitted documents, the SHPO seeks clarification on the following:
1. it is not clear if, or where, staging areas will be located in the direct APE,
2. it is not clear if the direct APE includes the 100 meter buffer mentioned in the March 28, 2017 meeting minutes, and
3. it is not clear what the total acreage of the established direct APE is at this time.

Upon receipt of this information this office will promptly resume its review.

Indirect APE:
It is not clear why the indirect APE has several “cutouts,” some of which are alongside or near areas where work will occur. The APE also has several areas in which it appears very narrow, versus other areas where it extends a considerable distance. In order to better understand why the APE is shaped in this manner, more information is needed about the location and type of each of the proposed new vertical elements. The SHPO suggests submitting a new set of maps, similar to those depicting the various arterial alternatives (Figures 1-5), that show exactly where light poles, retaining walls, elevated roadway segments, and other new vertical elements will be located. The maps could be color-coded to differentiate between elements of different heights. Ideally, those elements can be depicted on maps that also show the indirect APE so that our office can better understand the rationale behind the APE’s shape.
As the SHPO previously discussed with NDOT, the indirect APE should be based on topography and viewshed and not on parcel boundaries.

We request a meeting with your architectural historian to discuss the above.

Should you have any questions concerning this correspondence, please contact Jessica Axsom at (775) 684-3445 or by email at jaxsom@shpo.nv.gov or SHPO staff architectural historian Kristen Brown at (775) 684-3439 or by email at knbrown@shpo.nv.gov.

Sincerely,

Robin K. Reed
Deputy State Historic Preservation Officer

22603
Legend
- Indirect APE
- Areas Added to Indirect APE
- Direct APE
- Historic District
- Prosser Valley Ditch

Figure 1
Legend
- Indirect APE
- Areas Added to Indirect APE
- Direct APE
- Historic District
- Prosser Valley Ditch

Figure 1
### Table 1: Factors Used to Determine Indirect APE Boundary

The demarcation of the indirect APE varies in consideration of factors noted in this table. Photos of segment viewsheds are provided in Table 2. The rationale for "cutout" areas within the Indirect APE is discussed in the attached letter.

**Segment A:** Along Pyramid Highway – starting north of Calle de la Plata and ending at Lazy 5 Parkway

<table>
<thead>
<tr>
<th>Type of Improvement</th>
<th>Context of Improvement</th>
<th>Viewshed</th>
<th>Does adjacent parcel capture viewed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resurfacing, road widening, street lighting for safety per NDOT standards, traffic signals at select intersections, bike/ped facilities, at-grade tie-in road improvements at certain intersecting roads.</td>
<td>Within existing Pyramid Highway corridor. On existing transportation alignment. Located within both built and undeveloped environments, including commercial, residential, and vacant land. Existing road is at-grade. Existing vertical elements include power poles, street lights, road signage, traffic signals, commercial buildings and signage, residential structures, commercial landscaping, and hills west of highway.</td>
<td>Adjacent parcels where development is adjacent to road. Approx. 800 feet in more open/flatter areas.</td>
<td>Yes. Adjacent parcels capture the viewed because the proposed vertical elements (street lights and traffic signals), with an unobstructed line-of-sight, are not visually distinguishable beyond approximately 800 feet. Vertical elements would be visible from a much shorter distance than 800 feet where the line-of-sight is obstructed by development or hillsides adjacent to the road.</td>
</tr>
</tbody>
</table>

**Segment B:** Along Pyramid Highway starting approx. 0.4 mile south of Lazy 5 Parkway and ending approx. 0.25 mile south of Kiley Parkway.

<table>
<thead>
<tr>
<th>Type of Improvement</th>
<th>Context of Improvement</th>
<th>Viewshed</th>
<th>Does adjacent parcel capture viewed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change existing at-grade Pyramid Highway/Sparks Boulevard interchange to a grade-separated interchange, with Pyramid Highway crossing over Sparks Boulevard. Includes street lighting for safety per NDOT standards, traffic signals, road signage, bike/ped facilities along Pyramid Highway, and at-grade tie-in road improvements at Sparks Boulevard and Highland Ranch Parkway.</td>
<td>Within existing Pyramid Highway corridor. On existing transportation alignment. Located within both built and undeveloped environments. Existing road is at-grade. Existing vertical elements include power poles, road signage, street lighting, traffic signals, residential buildings, masonry noise wall approx. 5 feet high, residential landscaping, and hills west of highway.</td>
<td>In undeveloped areas, improvements would be visually indistinguishable from the east at approximately 800 feet. In developed areas east of the highway, the improvements would be visible from adjacent parcels. Views of improvements from the west are constrained by undeveloped hillsides on west side of highway.</td>
<td>Yes. Adjacent parcels capture the viewed because the proposed vertical elements are not visually distinguishable beyond approximately 800 feet. Vertical elements would be visible from a much shorter distance than 800 feet where the line-of-sight is obstructed by development or hillsides adjacent to the road.</td>
</tr>
</tbody>
</table>

**Segment C:** Along Pyramid Highway starting approximately 0.25 mile south of Kiley Parkway

<table>
<thead>
<tr>
<th>Type of Improvement</th>
<th>Context of Improvement</th>
<th>Viewshed</th>
<th>Does adjacent parcel capture viewed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resurfacing, road widening, street lighting for safety per NDOT standards, traffic signals at select intersections, bike/ped facilities, at-grade tie-in road improvements at certain intersecting roads.</td>
<td>Within existing Pyramid Highway corridor. On existing transportation alignment. Located in both built and undeveloped environments, including commercial, residential, and vacant land. Existing</td>
<td>At-grade road improvements (limited to adjacent properties/parcels), and above-grade elements that include street lighting and traffic signals at certain intersections are visually indistinguishable at approx. 800 feet. Flat topography along road/valley floor. Line-of-Sight: Improvements would be visually indistinguishable beyond approximately 800 feet.</td>
<td>Yes. Parcels included in the indirect APE in this segment capture the viewed due to topography and/or developments.</td>
</tr>
</tbody>
</table>

---

**Table 1: Factors Used to Determine Indirect APE Boundary**

<table>
<thead>
<tr>
<th>Segment (based on improvement type – see Figure 2 for segment locations)</th>
<th>Type of Improvement</th>
<th>Context of Improvement</th>
<th>Viewshed</th>
<th>Does adjacent parcel capture viewed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Segment A: Along Pyramid Highway – starting north of Calle de la Plata and ending at Lazy 5 Parkway</td>
<td>Resurfacing, road widening, street lighting for safety per NDOT standards, traffic signals at select intersections, bike/ped facilities, at-grade tie-in road improvements at certain intersecting roads.</td>
<td>Within existing Pyramid Highway corridor. On existing transportation alignment. Located in both built and undeveloped environments, including commercial, residential, and vacant land. Existing</td>
<td>Viewshed from Improvement (approx. distance in feet)</td>
<td>Yes or no, explain.</td>
</tr>
</tbody>
</table>

**Factors Considered to Determine APE Boundary**

- At Grade (limited to adjacent properties/parcels)
- Above Grade (Elevated structures such as flyovers, overpasses, ramps)
- Topography (valley floor, ridgeline, slope, hilltop)
- Line-of-Sight (Are there obstacles blocking view)
- Vantage (mountain backdrop, looking upslope, looking downslope)
<table>
<thead>
<tr>
<th>Segment</th>
<th>Type of Improvement</th>
<th>Context of Improvement</th>
<th>Factors Considered to Determine APE Boundary</th>
<th>Does adjacent parcel capture viewed?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Segment D</strong>&lt;br&gt;Along Pyramid Highway where new US 395 Connector veers away from Pyramid Highway under Arterial Alternatives 2 and 4.</td>
<td>• Road widening (Pyramid Highway), overpass for new diamond interchange at Los Altos Parkway, street lighting for safety per NDOT standards, bike/ped facilities, at-grade tie-in road improvements at certain intersecting roads.</td>
<td>• Existing vertical elements include power poles, street lights, road signage, traffic signals, earthen berms and massonry noise walls (walls approx. 5 feet high), residential buildings, church, and hills west of road.</td>
<td>• Views of at-grade road improvements are limited to adjacent properties/parcels, and above-grade elements are visually indistinguishable at approx. 800 feet from downgradient areas to the east. • Road is relatively flat. Areas west of the road are upgradient with hills, areas to the east are downgradient from the road. • Line-of-Sight: Improvements viewed from adjacent parcels. In more open undeveloped areas, improvements are visually indistinguishable at approx. 800 feet. • Vantage point: Topography is slightly downgradient of the highway to the east and upgradient to the west. This generally makes improvements more visible from the west and comparatively less visible from the east. Above-grade improvements would be viewed from the east against either existing development or hillsides.</td>
<td>• Yes. Parcel included in the indirect APE in this segment capture the viewed (in this segment, some areas of the indirect APE include both adjacent and next row of parcels, and several adjacent parcels are large and extend 600 to 800 feet from road), due to topography and/or developments.</td>
</tr>
<tr>
<td><strong>Segment E</strong>&lt;br&gt;Along Pyramid Highway from Disc Drive south to Queen Way, and along Disc Drive from Pyramid Highway east to just east of Vista Boulevard. These two roads are included in this segment because of similar improvements proposed for both in this area.</td>
<td>• Resurfacing, road widening, street lighting for safety per NDOT standards, bike/ped facilities, at-grade tie-in road improvements at major intersecting streets.</td>
<td>• At-grade road improvements, and above-grade elements that include street lighting, bike/ped facilities and tie-in road improvements. • Along Pyramid: Located on valley floor and through rolling topography/hills farther south. Rolling hills variously located along east and west sides of road. Along Disc Drive: Located along relatively flat area. • Line-of-Sight: Pyramid Highway: View of improvements largely limited to adjacent parcels due to hilly topography and at-grade nature of improvements. Farther south, views of improvements are limited to adjacent parcels due to adjacent development. Disc Drive: View of improvements largely limited to adjacent parcels due to development adjacent to road. Views from some adjacent residential developments are blocked by landscaping and fencing. Vantage point: Pyramid Highway: Adjacent upgradient areas near road would look down on existing developed transportation corridor. Areas downgradient from road would look up to road, making improvements less visible from those areas. Disc Drive: Views from adjacent developments/parcels from commercial establishments and associated parking lots. In more open areas, views of the at-grade improvements are visually indistinguishable beyond approximately 400 feet.</td>
<td>• Pyramid Highway: West of Pyramid Highway, undeveloped hills on both sides along most areas of the road in this segment constrain distant views. In developed areas, views of the highway are limited to adjacent parcels. • Disc Drive: In developed areas, Disc Drive is visible from adjacent parcels. In undeveloped areas, Disc Drive and its vertical elements become visually indistinguishable beyond approx. 400 feet.</td>
<td>• Yes. Parcel included in the indirect APE in this segment capture the viewed due to topography and/or adjacent developments.</td>
</tr>
</tbody>
</table>
### Segment F: Along new US 395 Connector alignments between Pyramid Highway and Sun Valley Boulevard

- **New road construction on new alignment, with both at-grade, below-grade, and elevated sections (including ramps and overpasses) depending on the arterial alternative alignment and topography they cross. Includes bike/ped facilities and street lighting for safety per NDOT standards.**

- **Context of Improvement:**
  - On new alignment within undeveloped environment.
  - Existing vertical elements include rolling undeveloped hills, power poles.

- **Viewed:**
  - Below, at-, and above-grade improvements.
  - Topography: slopes, hilly terrain.
  - Line-of-Sight: Improvements are visible from the south and east as they cross the undeveloped hillsides, but those views are intermittent and blocked in some areas due to the hilly terrain. Views of improvements from the northwest are blocked by hilly areas.
  - Vantage point: The improvements would be viewed from a downstream location toward the improvements located on upgradient hills. The terrain slopes downhill to the east, making the hilly areas and new proposed alignments visible from areas along Pyramid Highway and parcels east of Pyramid Highway. Due to the hilly terrain that the alternatives would cross, distance, and area development, areas where the improvements would be visually distinguishable vary. The proposed improvements would not be visually distinguishable from the eastern-most indirect APE boundary east of Pyramid Highway. Some parcels in this segment located between Pyramid Highway and proposed arterial alignments west of Pyramid (north of Los Altos Parkway) contain structures built in 1999 and later and, as such, are not included in the indirect APE.

- **Viewed from Improvement:**
  - Viewed from the west side of improvements extending just north of Sun Valley Blvd., Valy Blvd., US 395 Connector.
  - Viewed a distance between 650 ft., 1,650 ft., 3,000 ft., 3,910 ft.

- **Factors Considered to Determine APE Boundary:**
  - Improvements included in the indirect APE in this segment capture the viewed due to (1) the large size of the parcels included in the indirect APE in this area; (2) hilly terrain that blocks views of the improvements from varying areas, and (4) viewer distance from improvements, making improvements visually indistinguishable or no impactful (range depends on topography – see discussion under “Viewshed” column). Note that some parcels potentially within viewed are not included in the Indirect APE because they are not of sufficient age to be evaluated for NRHP eligibility (they were built in 1969 or later).

### Segment G: in Sun Valley along the new US 395 Connector where it spans Sun Valley Boulevard.

- **New road on new alignment with bridge/overpass and ramps (associated with new US 395 connector crossing over Sun Valley Boulevard). Includes street lighting for safety per NDOT standards, and bike/ped facilities.**

- **Context of Improvement:**
  - On new alignment within existing built environment. Segment crosses existing Sun Valley Boulevard transportation corridor.
  - Existing vertical elements include power poles, street lighting, commercial and residential structures, commercial and residential landscaping, traffic signals, hills.

- **Above-grade improvements (overpasses, ramps) as well as at-grade improvements on local roads.**
  - Topography: Slightly sloping terrain adjacent to Sun Valley Boulevard with more pronounced slopes farther to the east and west sides of Sun Valley Blvd.
  - Line-of-Sight: Above-grade improvements can be seen from residential and commercial areas north and south of proposed alignment. Views of above-grade improvements are intermittently blocked by hilly areas, multi-story apartment buildings, and mature residential vegetation scattered within adjacent neighborhoods. At-grade improvements would be viewed from adjacent parcels due to area development. Line-of-Sight from certain residential parcels in this area would be shielded by adjacent developed parcels, mature vegetation, and topography such they would not experience demonstrable impacts from the proposed improvements.
  - Vantage point: Above grade improvements (overpass, ramps) would be viewed from adjacent areas that are downstream from improvements. At-grade improvements would be visible from adjacent parcels.

- **Viewed:**
  - Viewed: segments range between 185 to 300 feet.

- **Viewed from Improvement:**
  - Parcels included in the indirect APE capture the viewed due to area topography and development. Under Arterial Alts 1 and 4 (that have the northern crossing of Sun Valley) proposed at-grade improvements along Leon Drive were identified after indirect APE was established and currently fall outside indirect APE. However, Arterial Alt. 3 is identified as the Preferred Alternative, which does not include those Leon Drive improvements. If so, then the indirect APE resolves to 3 parcels, which are identified as Preferred Alternative, which is unlikely, NDOT will consult with SHPO on areas where the footprint/direct APE associated with those alternatives falls outside the indirect APE.

### Segment H: Along Sun Valley Boulevard starting just south of 1st Avenue and ending just north of Crystal Lane.

- **Road widening. At-grade access changes at certain existing intersections along Sun Valley Boulevard (modified to right-in/right-out only).**

- **Above-grade improvements associated with new US 395 crossing of Sun Valley Boulevard are discussed under Segment G.**

- **Context of Improvement:**
  - On existing Sun Valley Boulevard transportation corridor within existing built environment.
  - Existing vertical elements include power poles, street lighting, commercial and residential structures, commercial and residential landscaping, traffic signals, hills.

- **At-grade improvements, limited to adjacent properties/parcels.**
  - Topography: Slightly rolling/hilly.
  - Line of Sight: Viewed from adjacent properties/parcels. Topography and distance to viewers farther south and east would minimize visual presence of improvements.
  - Vantage point: Road is gently rolling, restricting longer distant views down the road. Nearby areas to the south are upslope, while areas to the immediate north are downslope, with taller undeveloped hills in the near distance blocking longer distant views. Views of improvements would be viewed from upslope areas to the west, and slightly downhill areas to the east.

- **Viewed:**
  - Averages approximately 175 feet.

- **Viewed from Improvement:**
  - Yes, because improvements would occur along existing road and are list of at-grade improvements, such as widening. Hilly area and existing development blocks distant views of road improvements.

### Segment I: Along the new US 395 Connector between Sun Valley Boulevard and US 395, where Raggio Parkway and Dandini Boulevard would be realigned. Ending at improved interchange at US 395/Parr Boulevard/New

- **New road on new alignment (US 395 US 395 Connector and Raggio Parkway extension to the north). Alts 3 and 4, include above-grade West of Sun Valley Highway interchange in this segment.** For all arterial alternatives, road realignment (Dandini Boulevard and Raggio Parkway) results in construction of new roadways. From adjacent neighborhoods. At-grade improvements would be viewed from adjacent parcels due to area development. Viewshed ranges between 650 ft., 1,650 ft., 3,000 ft., 3,910 ft.

- **Realignment of two existing roads (Raggio Parkway and Dandini Boulevard) occurring at-grade and along existing and new alignments. Raggio Parkway would be extended on new alignment north to 2nd Avenue. At-grade in road improvements at 1st and 2nd Avenue at extended Raggio Parkway. Overpass for crossing of extended Raggio Parkway and ramps. Grade-separated improvements to existing grade-separated Parr Boulevard US 395 interchange to accommodate addition of new US 395 Connector – includes overpass and grade.

- **Context of Improvement:**
  - Existing vertical elements include power poles, street lighting, commercial and residential structures, commercial and residential landscaping, traffic signals, hills.

- **At-grade improvements.**
  - Topography: Hilly.
  - Line of Sight: Intermittent due to hilly terrain. Some areas’ line of sight is limited to adjacent parcels. Longer distant views are possible to the south and east, but distance and topography would make improvements minimally noticeable.

- **Viewpoint:**
  - Viewed: From the DRI and TMCC campuses adjacent to roadways. From adjacent parcels on eastern side of this segment, depending on terrain.

- **Varies greatly due to hilly terrain. Sometimes viewed limited adjacent to road, other areas 200 feet. Further distant views exist to the east/downslope due to distance, improvements would not have visual impacts beyond approx. 0.5 mile.

- **Factors Considered to Determine APE Boundary:**
  - Yes. For grade-sep improvements – adjacent parcels are large enough to encompass visually distinguishable improvements especially in the hilly setting. All improvements are visible from adjacent parcels. Longer distant views are possible from the south and distance from viewers, improvements would not be visually distinguishable.
<table>
<thead>
<tr>
<th>Segment</th>
<th>Type of Improvement</th>
<th>Context of Improvement</th>
<th>Factors Considered to Determine APE Boundary</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 395 Connector.</td>
<td></td>
<td>poles, street lights, road signage, traffic signals, educational institution buildings, commercial buildings and landscaping, and hills.</td>
<td></td>
</tr>
<tr>
<td>Segment J: Along US 395 extending approx. 0.5 mile north of, and approx. 0.9 mile south of existing Parr Boulevard.</td>
<td></td>
<td>• Road widening (adding auxiliary lanes along US 395), • On existing transportation alignment within both developed and undeveloped environment, • Existing vertical elements include power poles, guardrails, and adjacent hills.</td>
<td>• At-grade road improvements (limited to adjacent properties/parcels). • Road is relatively flat as it cuts through hilly area. • Line-of-Sight: View of improvements is limited to adjacent parcels due to topography. In fact, several adjacent parcels do not have line of sight/views of the road due to their location upgradient from the road. Although the at-grade elevation on which the road is located rises gradually in this area as one travels north, potentially making the improvements viewable from greater distances, the adjacent hills block most longer-distance views of the improvements. Any longer distant views provided would be at such a distance as to render the improvements visually indistinguishable. • Vantage point: Adjacent parcels are upgradient on both sides of road due to topography and would look down toward the road.</td>
</tr>
</tbody>
</table>
Table 2: Viewshed Photos, by Segment

See Figure 2 for segment locations.

<table>
<thead>
<tr>
<th>Segment</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Segment A: Along Pyramid Highway – starting north of Calle de la Plata and ending approximately 0.4 mile south of Lazy 5 Parkway.</td>
<td><img src="image1" alt="View looking south along Pyramid Highway at Egyptian Drive." /></td>
</tr>
<tr>
<td></td>
<td><img src="image2" alt="View looking south along Pyramid Highway at La Posada Drive/Eagle Canyon Drive." /></td>
</tr>
<tr>
<td></td>
<td><img src="image3" alt="View looking west toward Pyramid Highway from La Posada Drive approximately 650 feet east of the highway. While Pyramid Highway and its vertical elements are visible to parcels adjacent to the highway in this area, the highway and its vertical elements are visually indistinguishable from the surrounding built environment at this distance." /></td>
</tr>
<tr>
<td></td>
<td><img src="image4" alt="View looking south along Pyramid Highway north of Lazy 5 Parkway." /></td>
</tr>
</tbody>
</table>

Source of all photos: Google Streetview
Below is view looking south along Pyramid Highway at Lazy 5 Parkway.

Below is view looking west toward Pyramid Highway from the Lazy 5 Parkway/Allen Parkway intersection located approximately 1,170 feet east of Pyramid Highway. As seen, Pyramid Highway and its existing vertical elements (street lights, signage) are visually indistinguishable in this view.
<table>
<thead>
<tr>
<th>Segment</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Segment B</strong>: Along Pyramid Highway starting approx. 0.4 mile south of Lazy 5 Parkway and ending approx. 0.25 mile south of Kiley Parkway.</td>
<td><img src="image1" alt="View looking south along Pyramid Highway with Sparks Boulevard intersection seen in the middle of the photo." /></td>
</tr>
<tr>
<td></td>
<td><img src="image2" alt="View looking west toward Pyramid Highway from Sparks Boulevard approx. 800 feet east of the Highway. As seen, Pyramid Highway and its existing vertical elements (street lights, signage) are visually indistinguishable in this view." /></td>
</tr>
<tr>
<td></td>
<td><img src="image3" alt="View looking south along Pyramid Highway at Kiley Parkway." /></td>
</tr>
<tr>
<td></td>
<td><img src="image4" alt="View looking north along Pyramid Highway at Kiley Parkway." /></td>
</tr>
<tr>
<td>Segment</td>
<td>Viewshed Photo</td>
</tr>
<tr>
<td>---------</td>
<td>----------------</td>
</tr>
<tr>
<td><strong>Segment C</strong>: Along Pyramid Highway starting approximately 0.25 mile south of Kiley Parkway and ending approximately 0.30 mile north of Los Altos Parkway.</td>
<td><img src="image1" alt="Viewshed Photo" /></td>
</tr>
<tr>
<td>Below is view looking south along Pyramid Highway at Golden View Drive:</td>
<td><img src="image2" alt="Viewshed Photo" /></td>
</tr>
<tr>
<td>Below is view looking south along Pyramid Highway south of Golden View Drive:</td>
<td><img src="image3" alt="Viewshed Photo" /></td>
</tr>
</tbody>
</table>

Source of all photos: Google Streetview
<table>
<thead>
<tr>
<th>Segment D: Along Pyramid Highway where new US 395 Connector veers away from Pyramid Highway under Arterial Alternatives 2 and 4.</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Below is view looking south along Pyramid Highway at Los Altos Parkway:</td>
<td>![View Looking South]</td>
</tr>
<tr>
<td>Below is view looking north along Pyramid Highway at Disc Drive:</td>
<td>![View Looking North]</td>
</tr>
<tr>
<td>Below is view looking west toward Pyramid Highway from Disc Drive approx. 450 east of the Highway.</td>
<td>![View Looking West]</td>
</tr>
</tbody>
</table>
### Segment E: Along Pyramid Highway from Disc Drive south to Queen Way, and along Disc Drive from Pyramid Highway east to just east of Vista Boulevard.

These two roads are included in this segment because of similar improvements proposed for both in this area.

<table>
<thead>
<tr>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Below is view looking south along Pyramid Highway south of Disc Drive:</td>
</tr>
<tr>
<td><img src="image1" alt="View south along Pyramid Highway south of Disc Drive" /></td>
</tr>
<tr>
<td>Below is view looking north along Pyramid Highway at Queen Way:</td>
</tr>
<tr>
<td><img src="image2" alt="View north along Pyramid Highway at Queen Way" /></td>
</tr>
<tr>
<td>Below is view looking west along Disc Drive at Vista Boulevard:</td>
</tr>
<tr>
<td><img src="image3" alt="View west along Disc Drive at Vista Boulevard" /></td>
</tr>
<tr>
<td>Below is view looking west along Disc Drive at Sparks Boulevard:</td>
</tr>
<tr>
<td><img src="image4" alt="View west along Disc Drive at Sparks Boulevard" /></td>
</tr>
<tr>
<td>Segment E (Continued)</td>
</tr>
<tr>
<td>----------------------</td>
</tr>
<tr>
<td>Below is view looking north along Sparks Boulevard toward Disc Drive at a distance of approx. 400 feet; Disc Drive and its vertical elements (street lights) become visually indistinguishable beyond this point.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Segment F: Along new US 395 Connector alignments between Pyramid Highway and Sun Valley</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Below is view looking northwest from Pyramid Highway toward area of the new US 395 Connector alignments.</td>
<td></td>
</tr>
<tr>
<td>Below is view looking northwest from High Rock Way in residential development south of the connector alignments – hills block views of improvements from this location.</td>
<td></td>
</tr>
</tbody>
</table>
Segment G: In Sun Valley along the new US 395 Connector where it spans Sun Valley Boulevard.

Below is view along Leon Drive looking south toward the US 395 Connector crossing. The northern US 395 Connector would be approximately 880 feet from this viewpoint; the southern crossing would be approximately 1,760 feet from this viewpoint.

Segment H: Along Sun Valley Boulevard starting just south of 1st Avenue and ending just north of Crystal Lane.

Below is view looking north along Sun Valley Boulevard at El Rancho Drive/Dandini Blvd. Topography to the east and west is somewhat hilly, limiting distant views.

Below is view looking south along Sun Valley Boulevard at 1st Avenue:
Below are two visual simulations for two viewpoints prepared for the Final Environmental Impact Statement as part of the overall visual impact assessment conducted for the undertaking. The two viewpoints below are located along Sun Valley Boulevard to illustrate how the north and south US 395 connector crossings of Sun Valley may appear from Sun Valley Boulevard. Both viewpoints are looking north along Sun Valley Boulevard.

Viewpoint 1: View of US 395 connector northern crossing of Sun Valley Boulevard (from a point approximately 360 feet south of northern crossing):

<table>
<thead>
<tr>
<th>Segment</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Segment H (continued)</td>
<td>Below are two visual simulations for two viewpoints prepared for the Final Environmental Impact Statement as part of the overall visual impact assessment conducted for the undertaking. The two viewpoints below are located along Sun Valley Boulevard to illustrate how the north and south US 395 connector crossings of Sun Valley may appear from Sun Valley Boulevard. Both viewpoints are looking north along Sun Valley Boulevard. Viewpoint 1: View of US 395 connector northern crossing of Sun Valley Boulevard (from a point approximately 360 feet south of northern crossing):</td>
</tr>
</tbody>
</table>

Before:

<table>
<thead>
<tr>
<th>View</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Before:</td>
</tr>
</tbody>
</table>

After:

<table>
<thead>
<tr>
<th>View</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>After:</td>
</tr>
</tbody>
</table>

Source of all photos: Google Streetview
**Segment H (Continued)**

Viewpoint 2: View of US 395 Connector southern crossing of Sun Valley Boulevard (from a point approximately 1,470 feet south of the proposed southern crossing):

**Before:**

![Before Image](image1)

**After:**

![After Image](image2)
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image1" alt="Viewshed Photo" /></td>
</tr>
<tr>
<td><img src="image2" alt="Viewshed Photo" /></td>
</tr>
<tr>
<td><img src="image3" alt="Viewshed Photo" /></td>
</tr>
<tr>
<td><img src="image4" alt="Viewshed Photo" /></td>
</tr>
</tbody>
</table>

Below is view looking west along Dandini Boulevard at Truckee Meadows Community College:

Below is view looking west along Dandini Boulevard just east of US 395:

Below is view looking south along Raggio Parkway, south of Disc Drive:

Below is view looking west from Raggio Parkway toward the US 395/Parr Boulevard existing interchange (existing US 395 is below-grade/not visible from this viewpoint):
Below is view looking east from Parr Boulevard toward existing US 395/Parr Boulevard; this interchange would be reconfigured to accommodate new US 395 connection; interchange is approx. 600 feet away in this view.

Below view is looking northwest along existing US 395 approx. 2,300 ft. south of current US 395/Parr Boulevard interchange – interchange area is not visually distinguishable beyond this point to the south.

Below is view looking southeast along existing US 395 approx. 1,230 ft. north of existing US 395/Parr Boulevard interchange – interchange area is not visually distinguishable beyond this point farther north.
<table>
<thead>
<tr>
<th>Segment</th>
<th>Viewshed Photo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Segment J</td>
<td>Along US 395 extending approx. 0.5 mile north of, and approx. 0.9 mile south of existing Parr Boulevard.</td>
</tr>
</tbody>
</table>

Below is view looking north along US 395 from approximately 2,200 feet south of the existing Parr Boulevard Interchange.

Source of all photos: Google Streetview
October 19, 2017

MS. RACHEL CREWS
ARCHAEOLOGIST
BUREAU OF LAND MANAGEMENT
5665 MORGAN MILL ROAD
CARSON CITY NEVADA 89701

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Determinations of Eligibility and Effects for Historic Architecture and Archaeological
Resources and Section 4(f) De Minimis Notification
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Crews:

The Federal Highway Administration (FHWA) and Nevada Department of Transportation (NDOT) are
requesting your review and comment on the determination of eligibility and effects as detailed in the
attached letter to the State Historic Preservation Officer, per the 2014 Federal-Aid Transportation
Programmatic Agreement (PA)\(^1\) (V.F.).

Please let me know if you have any questions.

Sincerely,

C. Cliff Cregier
Chief Cultural Resources Program Manager

Enclosures:

October 19, 2017 letter to the State Historic Preservation Officer, and its attachments

cc: Abdelmoez Abdalla, FHWA
Jacob Waclaw, FHWA
Dale Wegner, FHWA
Greg Novak, FHWA
Pyramid Lake Paiute Tribe
Reno-Sparks Indian Colony

\(^1\) Programmatic Agreement Among the Federal Highway Administration, The Nevada Department of
Transportation, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation
BRIAN SANDOVAL
Governor

RUDY MALFABON, P.E., Director

STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION
1263 S. Stewart Street
Carson City, Nevada  89712

October 19, 2017

MS. REBECCA PALMER
STATE HISTORIC PRESERVATION OFFICER
NEVADA STATE HISTORIC PRESERVATION OFFICE
901 S. STEWART STREET SUITE 5004
CARSON CITY NEVADA 89701 4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Determinations of Eligibility and Effects for Historic Architecture and Archaeological Resources and Section 4(f) De Minimis Notification
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-019(065) & DE-019(067);
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

We have received your September 6, 2017 letter wherein you provided concurrence with the Direct Area of Potential Effects (APE) established for the above-referenced undertaking, requested changes to the Indirect APE, and posed other questions and requests for clarification. Thank you for your concurrence with the Direct APE.

As discussed in the March 28, 2017 meeting amongst the State Historic Preservation Office (SHPO), Federal Highway Administration (FHWA), Nevada Department of Transportation (NDOT), and the Regional Transportation Commission (RTC), and to respond to your September 6, 2017 letter, the purposes of this letter are as follows:

A. Address requests and questions posed in your September 6, 2017 letter.
B. Summarize the historic architecture and archaeological surveys conducted for this undertaking.
C. Consultations
D. Evaluate areas recently added to the APEs for presence of cultural resources (see our August 8, 2017 letter to your office for additional information).
E. Summarize previous National Register of Historic Places (NRHP) eligibility determinations for historic architecture resources and present updated effect recommendations for NRHP-eligible historic architecture resources.
F. Summarize previous NRHP eligibility recommendations for archaeological resources and reiterate effect recommendations for NRHP-eligible archaeological resources.
G. Summarize effect recommendations for historic architecture and archaeological resources.
H. Notify your office of the Section 4(f) approach for the undertaking.
I. Request your concurrence on the Indirect APE and eligibility and effect recommendations, and your acknowledgement of Section 4(f) approach.

Information previously provided to your office that differs from that provided in this letter is superseded by this letter. FHWA, NDOT, and RTC are currently preparing the Final Environmental Impact
In Reply Refer to:

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Determinations of Eligibility and Effects for Historic Architecture and Archaeological
Resources and Section 4(f) De Minimis Notification
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);
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I. Request your concurrence on the Indirect APE and eligibility and effect recommendations, and your acknowledgement of Section 4(f) approach.

Information previously provided to your office that differs from that provided in this letter is superseded by this letter. FHWA, NDOT, and RTC are currently preparing the Final Environmental Impact
Statement (Final EIS) for this undertaking, in which Arterial Alternative 3 has been identified as the Preferred Alternative. Please refer to our April 19, 2017 letter to your office for a complete description of Arterial Alternative 3 (Preferred Alternative).

A. Address requests and questions posed in your September 6, 2017 letter.

Requests and questions in your September 6, 2017 are enumerated below, with responses provided under each.

1. Modify Indirect APE to clearly include gaps between the Direct and Indirect APE in Segments A, E, and J shown on Figure 3 (attachment to August 8, 2017 letter to SHPO): Response: The Indirect APE has been modified as requested. The Direct APE and modified Indirect APE are shown on Figure 1 attached. (Note that the Figure 3 attached to our August 8, 2017 letter showed the Indirect APE and the Arterial Alternative elements – and not the Direct APE).

2. Regarding areas newly added to the Indirect APE (depicted as light yellow on Figures 1 and 3), the SHPO looks forward to receiving more information for review for both archaeology and architectural resources. Response: This information is provided in Section D Evaluation of areas recently added to Indirect APE, of this letter.

3. The SHPO is still missing the File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada. It is our understanding that it contains the following information necessary for our review (1) a detailed literature search from NVCRIS, the Nevada State Museum, the Bureau of Land Management-Carson City office, historic records and historic maps and (2) details on consultation regarding the Nationally Designated Trail corridors within the APE. Response: This report (May 17, 2012) is attached and includes requested information. Note that the report titled, A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (Revised April 28, 2015) is also attached, which documents the cultural resources inventory conducted for the Preferred Alternative (Arterial Alternative 3).

4. We request that NDOT confirm that the Direct APE illustrated in Figure 1 has been completely surveyed for archaeological resources for this undertaking and all information has already been included in the general report and site forms. Response: The Direct APE has been completely surveyed for archaeological resources. Two archaeological surveys were conducted for this undertaking. First, a survey of the four-proposed project alternative footprints was conducted early in the study process (2010/2011) to preliminarily identify sites and isolates within those footprints for planning purposes. Those footprints cover the Direct APE area. The survey involved an archaeological file and literature search and walkover pedestrian survey. The file search area included the proposed project alternatives and lands at least a mile around them. Parcels within the alternative footprints were inventoried where site access was authorized. Please refer to the attached File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (March 5, 2012; Revised May 17, 2012) for more details about survey methodology, maps showing the project area, and survey results.

Later, an intensive Class III cultural resource survey was conducted only for the identified Preferred Alternative (Arterial Alternative 3). As described in the attached A Class III Cultural Resources Inventory or the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (WCRM, 2015), the area surveyed for archaeological resources included the construction footprint of the Preferred Alternative plus a 100-foot-wide buffer on either side of the
construction footprint to encompass direct effects from ground-disturbing activities and any applicable indirect effects. The Preferred Alternative construction footprint is shown on Figure 1 of the Class III Cultural Resources Inventory report. The archaeological survey area included a 100-foot-wide buffer on either side of that footprint. As such, the area surveyed for archaeological resources encompasses the Arterial Alternative 3 (Preferred Alternative) portion of the Direct APE. Please refer to our April 19, 2017 letter to your office for a description of, and maps showing the alignment of, Arterial Alternative 3 (Preferred Alternative). The Direct APE and modified Indirect APE are shown on USGS topo map on Figure 1 attached.

5. Please note that our office has not yet received a copy of the Peterson and Stoner 2003 report *A Class III Cultural Resources Inventory for the Kiley Ranch Project, Spanish Springs Valley, Washoe County, Nevada* that we requested in our August 31, 2012 letter. **Response:** We apologize for not responding to this request previously. The referenced report was one of several previous reports that documented historic architecture resources. In response to your request, we contacted the authors of the report. They noted that it was prepared for a private client for another project, did not undergo agency review, was never used for Section 106 consultation, and the report remains in draft form. As such, the report is considered proprietary information, and any use of it would need to be approved by the client (developer), which would be problematic because the development corporation involved no longer exists. As such, NDOT is unable to provide a copy of that report to your office. Note that the surveys, survey results, and eligibility and effect recommendations made for the Pyramid/US 395 project were based on the surveys and reconnaissance that were conducted for the Pyramid/US 395 project, and not on information contained in that 2003 draft report.

6. We request that the maximum height for new vertical crossings and other new vertical structures (light poles, retaining walls, etc.) be clearly described in the discussion of effects for each historic resource. **Response:** This design information is included under discussion of effects for historic resources recommended eligible for the NRHP under Criteria A and C and that potentially would experience indirect/visual effects from the undertaking (the Sierra Vista Ranch and Trosi Family/Kiley Ranch historic districts). This information is not provided in effects discussions for the Iratcabal Farm Historic District because it would not experience indirect effects due to its considerable distance from proposed improvements. This information also is not included in effects discussions for the Orr Ditch, Prosser Valley Ditch, or the three NRHP-eligible archaeological resources potentially impacted by Arterial Alternative 3 (Preferred Alternative) because those resources either have no integrity in the area of proposed improvements (Orr Ditch), their NRHP eligibility is based on characteristics of association rather than setting (Prosser Valley Ditch), or they are archaeological sites that are NRHP eligible under criterion D. Refer to discussion of effects later in this letter.

7. Please advise if the two visual simulations (Viewpoint 1 and Viewpoint 2) illustrated in Table 2, Segment H, are typical of other crossings for this project especially in the viewshed of identified historic resources. Does Viewpoint 1 illustrate the tallest crossing for this undertaking? Does Viewpoint 2 illustrate the design and height of most typical crossings for this undertaking? **Response:** Viewpoints 1 and 2 are visual simulations of the two US 395 Connector options for crossing Sun Valley Boulevard, with Viewpoint 1 showing the northern crossing (under Arterial Alternatives 1 and 4), and Viewpoint 2 showing the southern crossing (under Arterial Alternatives 2 and 3 [Arterial Alternative 3 is the Preferred Alternative]). These viewpoints are shown on attached Table A. The two US 395 Connector crossings of Sun Valley Boulevard are not typical of other interchanges proposed for this project. The topography of the valley and design constraints dictate the elevation of both crossing options. As it crosses Sun Valley Boulevard, the US 395 Connector bridge is about 50 feet above the existing road for the southern
crossing, and about 35 feet above the road for the northern crossing. (By comparison, the bridge surface for the Pyramid Highway/Sparks Boulevard grade-separated interchange would be a maximum height of approximately 25 feet above Sparks Boulevard.) The height and length of either of the US 395 Connector crossing structures tend to be more like a viaduct rather than a typical highway overpass. For the southern crossing option, the connector roadway is located in a cut on either side of Sun Valley Boulevard, meaning that the new road cuts into the hills located east and west of Sun Valley Boulevard. As such, the hills are higher than the proposed elevation of the new US 395 Connector crossing, which helps limit the visual impacts of the new crossing in the immediate area under Arterial Alternatives 2 and 3. Under Arterial Alternatives 3 and 4, the US 395 Connector bridge would likely have street lighting (approximately 32 feet tall) because of the ramps associated with the West of Sun Valley interchange proposed under those two alternatives. No street lights are anticipated on the US 395 Connector bridge under Arterial Alternatives 1 and 2 because the ramp connections would be located farther east and west than Arterial Alternatives 3 and 4. Either US 395 Connector bridge over Sun Valley Boulevard would be lined with a 42-inch tall solid concrete railing in accordance with NDOT standards. Other proposed interchanges vary depending on the arterial alternative (see description of undertaking attached to our April 19, 2017 letter to your office for details), but the Pyramid Highway/Sparks Boulevard grade-separated interchange is the only proposed interchange with the potential to affect the NRHP-eligibility of a historic architecture resource because it is located in the viewshed of the Trosi Family/Kiley Ranch Historic District (how this interchange would not affect this resource is discussed in Section E in this letter).

8. We request that the photos in Table 2 be keyed to a map to clarify the record. Response: The referenced photos were numbered (see attached Table A) and their locations were added to Figure 3 attached.

B. Summary of Historic Architecture and Archaeological Surveys Conducted

For historic architecture resources, Western Cultural Resource Management (WCRM), Inc., on behalf of FHWA, evaluated historic architecture resources within the Direct and Indirect APEs in 2011. The evaluation involved archival research and field survey. The methodology and survey results are documented in the Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (January 2012, Revised December 2012) (Architectural Inventory Report), which has been previously provided to your office, and summarized in previous Section 106 correspondence.

For archaeological resources, WCRM conducted a file and literature search, as well as a preliminary field survey in 2011 to identify potential archaeological resources within or near the footprints of the four build alternatives under consideration. The survey involved review of background information regarding previous studies in and near the project area as well as a walkover pedestrian survey of the build alternative footprints. This information was used for planning purposes as the study moved forward. The methodology and survey results are documented in the File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (WCRM, March 5, 2012; Revised May 17, 2012), which has been previously provided to your office and included as an attachment.

As noted in our April 19, 2017 letter to your office, the alternative designs evaluated in the 2013 Draft EIS were modified starting in 2014, in response to an updated traffic analysis that resulted in reduced traffic forecasts. The modified build alternatives, referred to as Arterial Alternatives, follow the same alignments as the original Draft EIS alternatives, but the modified designs resulted in an overall downsizing of the project footprint, including the elimination of some previously proposed grade-separated
interchanges and frontage roads along Pyramid Highway. In 2015, when Revised Alternative 3 (which is now referred to as Arterial Alternative 3) was identified as the Preferred Alternative, WCRM conducted a Class III intensive pedestrian archeological inventory of the Preferred Alternative in late 2014/early 2015. The survey area included the Preferred Alternative footprint plus a 100-foot-wide buffer on each side. Refer to our September 9, 2015 letter to your office for additional information. The methodology and survey results are documented in the *A Class III Cultural Resources Inventory or the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada* (WCRM, 2015), which was previously provided to your office and included as an attachment here.

C. Consultations

**Summary of National Park Service Congressional Trail Consultation**

NDOT consulted with the National Park Service (NPS) regarding the presence and location of Congressional Trails within the APE. The NPS maintains a National Historic Trails database that includes all Congressional Trail route designations. According to NPS data obtained in August 2012, portions of the California National Historic Trail (a Congressional Trail) are present within the Study Area, and trail segments are located near US 395. The trail corridor location provided by NPS was compared to the project footprint, and a site survey was conducted on August 15, 2012. Based on examination of the maps and walkover survey, no portions of the California National Historic Trail route are located within the project footprint (Direct APE). Due to confidentiality agreements with the NPS, the exact trail location is not disclosed in this letter.

In a May 19, 2017 email, NDOT provided a map of the project area boundary to the NPS and asked the NPS to comment on this undertaking, which may be in proximity of the California National Historic Trail. In a July 5, 2017 email response to NDOT, the NPS indicated that, as currently proposed, they have no concerns with the proposed undertaking as it pertains to the California National Historic Trail. Referenced emails are attached to this letter.

**Native American Consultation**

FHWA initiated formal government-to-government consultation with the Washoe Tribe of Nevada and California, the Reno-Sparks Indian Colony, and the Pyramid Lake Paiute Tribe through a letter to the tribes dated February 5, 2009 and continued consultation through March 7, 2017. Based on these consultations, the FHWA has determined that there are Native American concerns regarding NHPA issues surrounding this project as proposed. Tribal concerns about the eligibility of sites have been noted and tribal requests to avoid three sites were considered and evaluated. However, FHWA and NDOT determined that the project could only avoid one of the three sites. A copy of the Native American Consultation report is attached.

**Consultation with Interested Parties**

FHWA invited agencies, municipalities, tribal governments, and area organizations to serve as historic consulting parties for this undertaking. The SHPO, Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California are serving as Section 106 consulting parties for this project.

D. Evaluation of areas recently added to Indirect APE

As noted in our August 8, 2017 letter, additional areas were added to the Indirect APE following discussion with your office and to be consistent with the methodology discussed in that letter. Portions of parcels experiencing direct impacts were included in previous surveys conducted for this undertaking and discussed in prior consultation. Therefore, our attention focused on determining whether there was
potential for any historic architectural resources in these additional areas that may experience indirect effects from the project. Table 1 provides a more detailed list of, and details about, the additional areas and is organized by parcel or parcel grouping that correlates to a Map Identification Reference Number on Figure 1.

The following resources were used to identify potential historic architecture within these additional areas and assist in determining the need for additional field survey:

- Project plans to identify design elements and limits of disturbance
- APE map provided to SHPO with new areas identified (Figure 1)
- Washoe County Assessor Data (http://wcgisweb.washoecounty.us/QuickMap/)
  - Parcel Search
  - Real Property Assessment Data (including Year Built data)
  - Improvement Details
- USGS Historical Maps
  - 1891 (Nevada Reno Sheet, 1:125,000 scale)
  - 1950 (Reno Quadrangle, Nevada-Washoe Co., 1:62,500 scale)
  - 1951 (Reno Quadrangle, Nevada-Washoe Co., 1:62,500 scale)
  - 1957 (Reno, Nevada; California, 1:250,000 scale)
  - 1959 (Reno, Nevada; California, 1:250,000 scale)
  - 1960 (Reno, Nevada; California, 1:250,000 scale)
  - 1967 (Reno Quadrangle, Nevada-Washoe Co., 1:24,000 scale)
  - 1974 (Reno Quadrangle, Nevada, 1:24,000 scale)
  - 1980 (Reno, Nevada; California, 1:100,000 scale)
  - 1982 (Reno Quadrangle, Nevada, 1:24,000 scale)
- BLM General Land Office Records (https://glorecords.blm.gov/search/default.aspx?searchTabIndex=0&searchByTypeIndex=1)
  - Original surveys dated 6/30/1872 and 10/2/1865.
- Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (WCRM 2012)
- Aerial imagery (Imagery@2017 Google and Map data@2017 Google)
- Street View Imagery (Image capture: 2015 @2017 Google)

Following a review of the reference material noted above, none of these additional areas has the potential for historic architecture because either there is no physical or documentary evidence of any structures or built environment within the property, the existing structures on the property are not of sufficient age to be considered for NRHP eligibility (the earliest construction date is 1976), or the area has been heavily disturbed from construction of existing roadways. Therefore, there is no potential for historic architecture on these parcels and there is no need for additional field survey.
<table>
<thead>
<tr>
<th>Map ID Reference Number</th>
<th>APN #</th>
<th>General Location</th>
<th>Address, City, County, Zip Code</th>
<th>Ownership</th>
<th>Evaluation Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>53409107</td>
<td>East of Pyramid Highway south of La Posada Drive</td>
<td>La Posada Drive, Washoe County, 89520</td>
<td>Washoe County</td>
<td>No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>2</td>
<td>08918191</td>
<td>Northwest quadrant of Pyramid Highway / Robert Banks Boulevard intersection</td>
<td>Pyramid Way, Washoe County, 89436</td>
<td>Owners of Desert Springs 1</td>
<td>No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>3</td>
<td>8373003</td>
<td>West of Pyramid Highway near Kiley Parkway intersection</td>
<td>Pyramid Way, Washoe County, 89436</td>
<td>Talbot LLC</td>
<td>No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>4</td>
<td>8386109, 8386110, 8386111, 8386112</td>
<td>Four adjacent parcels located within residential development in southeast quadrant of Pyramid Highway/Kiley Parkway intersection</td>
<td>Pah Rah Drive, Washoe County, 89436</td>
<td>Private homeowners</td>
<td>These parcels contain contemporary single-family residences built from 1994 through 1996. No potential for historic architecture on parcels and no need for field survey. Note: These parcels were added to the Direct APE because they would be directly impacted from a water detention basin added to the design. The Direct and Indirect APE are one in the same at this location because of the type of improvement (at-grade). The Direct APE is shown on Figure 1.</td>
</tr>
<tr>
<td>5</td>
<td>51003129, 51003130, 51003131</td>
<td>Parcels located at residential cul-de-sac on Dorchester Drive</td>
<td>6885, 6881, and 6873 Dorchester Drive, Washoe County, 89436</td>
<td>Pyramid Cove LLC</td>
<td>No standing structures or built environment on parcels. No potential for historic architecture on parcels and no need for field survey.</td>
</tr>
<tr>
<td>Map ID Reference Number</td>
<td>APN #</td>
<td>General Location</td>
<td>Address, City, County, Zip Code</td>
<td>Ownership</td>
<td>Evaluation Results</td>
</tr>
<tr>
<td>-------------------------</td>
<td>----------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>---------------------------------</td>
<td>----------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>6</td>
<td>51049218, 51049231, 51049232</td>
<td>Adjacent parcels located within northeast quadrant of the Pyramid Highway/Los Altos Parkway intersection</td>
<td>232, 283, and 252 Los Altos Parkway, Sparks, NV 89436</td>
<td>51049218: HNM Properties Inc. 51049231: O'Reilly Auto 51049232: HNM Properties Inc.</td>
<td>These parcels are located within commercial development and are fully developed with buildings and parking lots built between 2007 and 2012. No potential for historic architecture on parcels and no need for field survey.</td>
</tr>
<tr>
<td>7</td>
<td>51038103, 51038104</td>
<td>Adjacent parcels located west of Pyramid Highway near Los Altos Parkway intersection</td>
<td>5005 and 5015 Pyramid Way, Sparks, NV 89436</td>
<td>51038103: Rialto LLC 51038104: Simon Trust</td>
<td>Both parcels are fully developed with commercial buildings and parking lots built in 2005 and 2006. No potential for historic architecture on parcels and no need for field survey.</td>
</tr>
<tr>
<td>8</td>
<td>3518301</td>
<td>On east side of Pyramid Highway south of Disc Drive</td>
<td>Pyramid Way, Sparks, NV 89436</td>
<td>Daytwa Assets LLC</td>
<td>Undeveloped parcel between Pyramid Highway and Wedekind Park. No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Note: Although there are remnants of two structures within the parcel; they are sufficiently diminished in integrity to warrant evaluation as archaeological resources and fall within the survey limits of the Class III Cultural Resources Inventory that was conducted.</td>
</tr>
<tr>
<td>9</td>
<td>3505125</td>
<td>Parcel in Sun Valley located south of new US 395 Connector (for Alts 2 and 3 only), east side of Sun Valley Boulevard and north of El Rancho Drive</td>
<td>4400 El Rancho Drive, Washoe County 89433</td>
<td>Sierra Point LLC</td>
<td>Apartment complex and associated parking areas built in 1998. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>Map ID Reference Number</td>
<td>APN #</td>
<td>General Location</td>
<td>Address, City, County, Zip Code</td>
<td>Ownership</td>
<td>Evaluation Results</td>
</tr>
<tr>
<td>-------------------------</td>
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<td>----------------------------------------------------------------------------------</td>
<td>---------------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>10</td>
<td>8506049, 8506050, 8506057, 8506069</td>
<td>Four parcels in Sun Valley located east of Sun Valley Boulevard and north of new US 395 Connector under Arterial Alts 1 and 4.</td>
<td>53, 55, 57, and 79 Franks Lane, Sun Valley, 89433</td>
<td>8506049, 8506050 and 8506057: Guy and Mary Ellen, Archer Living Trust 8506069: Zoyla and Juan Hernandez</td>
<td>Modular residences on all four parcels with initial lot improvements dating between 1990 and 1999. Although assessor data indicates that one structure was built as early as 1976, initial lot improvements on this parcel dates to 1999. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>11</td>
<td>3536601</td>
<td>Narrow parcel in Sun Valley located east of Sun Valley Boulevard.</td>
<td>Sun Valley Washoe County</td>
<td></td>
<td>No standing structures or built environment on parcel. No potential for historic architecture on parcel and no need for field survey.</td>
</tr>
<tr>
<td>12</td>
<td>Not applicable</td>
<td>Slivers along portions of Pyramid Highway, US 395, and Dandini Boulevard located between the Direct and Indirect APE, added to Indirect APE.</td>
<td>Not applicable Existing road rights-of-way</td>
<td></td>
<td>These areas were added to the Indirect APE per SHPO’s 9/6/17 request to eliminate perceived gaps between the Direct and Indirect APE in these areas. All these areas have been heavily disturbed from construction of existing roadways. No potential for historic architecture in these areas and no need for field survey.</td>
</tr>
</tbody>
</table>

Table 1: Evaluation of Parcels and Other Areas Added to Indirect APE in September 2017
E. Summary of Previous NRHP Eligibility Determinations for Historic Architecture Resources and Effect Recommendations

Historic Architecture Resource Eligibility Determinations

After receiving SHPO’s original concurrence on the architectural APE on October 11, 2011, FHWA and NDOT consulted with your office regarding NRHP eligibility determinations for historic architecture resources within the APE, which resulted in your concurrence in letters dated August 31, 2012 and April 3, 2013. Those eligibility determinations remain unchanged and are provided in Table 2 for your convenience (note: shaded rows in Table 2 are intended to associate historic districts with their contributing features and to differentiate the three historic districts). Historic architecture resources were assessed for NRHP eligibility from public rights-of-way (sidewalks, in the right-of-way, or in other public spaces) because the property owners did not authorize site access (refer to the Architectural Inventory Report, Section IV-Methodology, for details). Due to this limited site access, historic architecture resources remain unevaluated under Criterion D, except Prosser Valley Ditch, which was also evaluated as an archaeological resource and recommended not eligible under Criterion D (see discussion below). The Architectural Inventory Report (pages 32-33) describes the NRHP evaluation criteria specific to this project for evaluating historic architecture resources under NRHP criteria A, B, or C. The Architectural Inventory Report also describes land usage themes and sub-themes on page 32 and Section V-Historic Context.

Of the 19 historic architecture resources evaluated for NRHP eligibility (see Table 2), five have been determined NRHP-eligible as described below and shown on Figure 2. The remaining 14 properties have been determined not NRHP-eligible.

• Sierra Vista Ranch Historic District (SHPO Resource No. D93): This historic district is a ranch complex built during the early to mid-20th century and has been in operation since the 1910s (see Figure 4). Today, the ranch includes a ranch house (constructed 1953), a two-car garage (constructed 1940), a three-car garage (constructed 1949), two sheds (constructed 1915, 1940), a livestock barn (constructed 1954), a barn (constructed 1940), and a grain bin (constructed 1950). The ranch contains five buildings that are not visible from the road, and a modern house. No buildings remain from the ranch's original (1910s) construction. At present, the northern portion of the district is heavily vegetated around the buildings, while the southern portion is used for pasture. The historic district boundary matches the parcel boundary and encompasses 8.6 acres. Observations of ranch buildings that could be recorded from public rights-of-way indicated that the ranch should be considered eligible under Criterion C because it contains important examples of a typical mid-20th century ranch house and ranch outbuilding construction. The buildings and ranch appear to have the necessary associations to be considered eligible under Criterion A. No associations with important figures in local ranching history have been identified; therefore, the ranch is not recommended eligible under Criterion B. The buildings appear to retain sufficient integrity (setting, location, design, feeling, association, and workmanship) to merit NRHP eligibility (Architectural Inventory Report, Section VI-Survey Results). In summary, the site has been determined NRHP eligible under Criteria A and C.

• Trosi Family/Kiley Ranch Historic District (SHPO Resource No. D94): This historic district is a portion of a ranch complex built during the early 20th century and has been in operation since the 1920s (see Figure 5). Today, the ranch includes a ranch cottage (constructed 1920), a large "L"-shaped barn (constructed ca. 1940), livestock shed (constructed ca. 1940), and a chicken house (constructed 1940). The district's boundary matches the parcel boundary and encloses 6.6 acres. The building complex is associated with the theme of small farms and ranches that made a significant contribution to the evolution of local farming and ranching. The ranch is
representative of a once vastly larger population of the property type (that of small farms and ranches in the Spanish Springs Valley and Reno/Sparks area), which has substantially declined and is rapidly disappearing. The district also retains historic integrity in terms of location, design, setting, materials, workmanship, and feeling. Therefore, the property is recommended eligible under Criterion A. The buildings are in their original location, and have no additions or modifications that impair the quality of design, materials, and workmanship (historic fabric). Thus, the site is recommended eligible under Criterion C. No associations with important figures in local ranching history have been identified; therefore, the ranch is not recommended eligible under Criterion B (Architectural Inventory Report, Section VI-Survey Results). In summary, the site has been determined NRHP eligible under Criteria A and C.

• Iratabal Farm Historic District (SHPO Resource No. D95): This historic district is a farm complex built during the early to mid-20th century, and has been in operation since the 1930s (see Figure 7). Today, the farm includes a bunkhouse (constructed 1930), a privy (constructed ca. 1930), a pumphouse (constructed 1945), a mobile home/travel trailer (constructed 1956), a house (constructed 1945), a garage (constructed ca. 1945), a dairy barn (constructed 1930), a shed (constructed 1956), a livestock shed (constructed 1950), and a metal shed (constructed ca. 1960). The district's boundary matches the parcel boundary and encompasses 5.18 acres. The building complex is strongly associated with the theme of small farms and ranches that made a significant contribution to the evolution of local farming and ranching, which has substantially declined in the area. This farm complex is recommended eligible under Criterion A for its associations with mid-20th century Spanish Springs Valley farming and ranching, and under Criterion C as representative of the construction methods and materials common to western Nevada ranches of the early to mid-20th century. No associations with important figures in local ranching history have been identified; therefore, the ranch is not recommended eligible under Criterion B (Architectural Inventory Report, Section VI-Survey Results). In summary, the site has been determined NRHP eligible under Criteria A and C.

• Prosser Valley Ditch (SHPO Resource Nos. S820, WA5234, WA6134): The Prosser Valley Ditch consists of a segment of an earthen ditch system. The ditch project began as part of a statewide plan to develop arid lands and promote the growth of agriculture in Nevada. The ditch was constructed in various phases, and the portion in the project area was built prior to 1908. It was determined NRHP-eligible under Criterion A in 1995. The resource was reevaluated as part of this undertaking and nothing was found to suggest that the overall resource should be considered ineligible for the NRHP. The ditch is considered NRHP-eligible under Criterion A as representative of the irrigation mania that occurred between the 1890s and the early 1900s, and as representative of the dozens of speculative irrigation and land development projects attempted across Nevada and the West during that time. Moreover, the history of this site also touches on other significant trends in Nevada water development, such as the dominant role of the Bureau of Reclamation's Newlands Project in the region. Thus, the site, even though it apparently never carried water, is considered significant under Criterion A as representative of local water development attempts by private enterprise. Current research uncovered evidence that supports the ditch's eligibility under Criterion B for its association with the careers of important Reno business leaders and local politicians, such as Francis G. Newlands, P. L. Flannigan, and Walter H. Harris, and their attempts to use irrigation as a vehicle for land speculation.

Portions of three segments (lettered A, B, and C) of the remaining ditch intersect the Arterial Alternative footprints and total approximately 0.93 mile in length (see Figure 9). All of the recorded segments are in poor condition; they are overgrown and are impacted by erosion, development, and recreational vehicle use. The ditch has been completely obliterated along its path in several places. Segments A and B north of Dandini Boulevard have lost their integrity due
to natural forces and recreational vehicle use. Segment C located south of Dandini Boulevard has a discernible prism and ditch rider’s path and thus retains a higher degree of integrity than Segments A and B; however, it too has been completely obliterated in several areas by recreational vehicle use. Given its relative integrity, Segment C has been determined to contribute to the significance of the Prosser Valley Ditch while Segments A and B do not due to their lack of integrity. The resource does not have any significant water engineering features or characteristics within the recorded section to merit eligibility under Criterion C. The archaeological survey conducted in late 2014/early 2015 indicated that ditch Segment C is still eligible under Criteria A and B, and is unevaluated under Criterion D. Therefore, the resource is eligible for the NRHP under Criteria A and B.

- **Orr Ditch (SHPO Resource Nos. S828, 26Wa5352):** The Orr Ditch is a 19th century irrigation ditch that traverses the study area in a north-south direction (see Figure 2). The ditch extends beyond the Study Area; approximately 12.5 miles of the ditch fall within the Study Area. Because the ditch is a linear site, the condition and integrity of the site varies widely along its length. The ditch has been previously evaluated in multiple reports (conducted outside of this undertaking) since 1993 and is considered eligible under criteria A, B, and C, with contributing and non-contributing segments. In October 2011, the study team identified locations where the project footprint potentially intersected ditch segments and conducted a field survey of those locations. The Arterial Alternatives are located along the same alignments as the original build alternatives; therefore, the survey results noted here remain valid for the Arterial Alternatives under consideration. The survey found that the potential intersection points have no integrity due to modern maintenance and improvements made to the ditch; in some locations the ditch is located under a shopping mall and paved parking lot. In fact, most of the potential ditch intersection locations were found to be located outside the proposed project footprint. Please refer to the Architectural Inventory Report for details. FHWA has determined that ditch segments intersected by the project footprint are non-contributing elements of the overall resource.
<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource No.</th>
<th>Address</th>
<th>Resource Name</th>
<th>Architectural Style / Period</th>
<th>Date of Construction</th>
<th>NRHP Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>D93</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Historic District</td>
<td>N/A</td>
<td>1915-1954</td>
<td>Eligible (includes eight contributing properties [B11946-B11953] that are not considered individually eligible and five considered as non-contributing properties [of which four are unevaluated due to lack of access/visibility])</td>
</tr>
<tr>
<td>5.</td>
<td>B11949</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Livestock Barn</td>
<td>No style</td>
<td>1954</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>6.</td>
<td>B11950</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Shed 1</td>
<td>No style</td>
<td>1915</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>7.</td>
<td>B11951</td>
<td>Pyramid Way</td>
<td>Sierra Vista Ranch Shed 2</td>
<td>No style</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>8.</td>
<td>B11952</td>
<td>Pyramid Way</td>
<td>Sierra Vista Barn</td>
<td>No style</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District</td>
</tr>
<tr>
<td>10.</td>
<td>B11954</td>
<td>7000 Sparks Boulevard</td>
<td>Trosi Family/Kiley Ranch Historic District</td>
<td>N/A</td>
<td>1920 – ca. 1940</td>
<td>Eligible (includes four contributing properties [B11954-B11957] that are not considered individually eligible and no non-contributing properties)</td>
</tr>
<tr>
<td>11.</td>
<td>B11955</td>
<td>7000 Sparks Boulevard</td>
<td>Trosi Family Ranch/Dundrea House</td>
<td>No style/vernacular. One-story square plan, simple hipped roof dwelling</td>
<td>1920</td>
<td>Not individually eligible. Contributing element to Trosi Family/Kiley Ranch Historic District</td>
</tr>
<tr>
<td>12.</td>
<td>B11956</td>
<td>7000 Sparks Boulevard</td>
<td>Trosi Family Ranch “L” Barn</td>
<td>No style/vernacular</td>
<td>1930</td>
<td>Not individually eligible. Contributing element to Trosi Family/Kiley Ranch Historic District</td>
</tr>
<tr>
<td>13.</td>
<td>B11957</td>
<td>7000 Sparks Boulevard</td>
<td>Trosi Family Ranch Livestock Shed</td>
<td>No style/vernacular</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Trosi Family/Kiley Ranch Historic District</td>
</tr>
<tr>
<td>14.</td>
<td>B11958</td>
<td>7000 Sparks Boulevard</td>
<td>Trosi Family Ranch Chicken House</td>
<td>No style/vernacular</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Trosi Family/Kiley Ranch Historic District</td>
</tr>
</tbody>
</table>
## Table 2: Documented Historic Architecture Resources within the APE

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource No.</th>
<th>Address</th>
<th>Resource Name</th>
<th>Architectural Style / Period</th>
<th>Date of Construction</th>
<th>NRHP Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td>B11958</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm Historic District</td>
<td>N/A</td>
<td>1930 – ca. 1960</td>
<td>Eligible (includes ten contributing properties [B11958-B11967] that are not considered individually eligible and no non-contributing properties)</td>
</tr>
<tr>
<td>16</td>
<td>B11959</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm House</td>
<td>Post WW II/Ranch</td>
<td>1945</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>17</td>
<td>B11960</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm Bunkhouse</td>
<td>No style/vernacular</td>
<td>1945</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>18</td>
<td>B11961</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Mobile Home</td>
<td>No style</td>
<td>1956</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>19</td>
<td>B11962</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm Outhouse</td>
<td>No style/vernacular</td>
<td>1930</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>20</td>
<td>B11963</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm Garage</td>
<td>Post WW II</td>
<td>1945</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>21</td>
<td>B11964</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm Dairy Barn</td>
<td>No style/vernacular</td>
<td>1950</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>22</td>
<td>B11965</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm Livestock Shed</td>
<td>No style/vernacular</td>
<td>1956</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>23</td>
<td>B11966</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm Shed</td>
<td>No style/vernacular</td>
<td>ca. 1960</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>24</td>
<td>B11967</td>
<td>2710 Spanish Springs Road</td>
<td>Itatcabal Farm Metal Shed</td>
<td>No style/vernacular</td>
<td>1945</td>
<td>Not individually eligible. Contributing element to Itatcabal Farm Historic District</td>
</tr>
<tr>
<td>25</td>
<td>B11968</td>
<td>4728 E. Leonisio Drive</td>
<td>Flavia Neyes House</td>
<td>Post WW II, Contemporary Folk</td>
<td>1971</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>26</td>
<td>B11969</td>
<td>4710 W. Leonisio Drive</td>
<td>Vickie Tonner House/Ronald C. Tonner House</td>
<td>Post WW II, Contemporary Folk, double-wide mobile home</td>
<td>ca. 1965 for lot and initial building, current home built in 1982</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>28</td>
<td>B11971</td>
<td>4734 W. Leonisio Drive</td>
<td>Gyford Taylor Home/Wanda L. Taylor Home</td>
<td>Post WW II, Contemporary Folk, double-wide manufactured home</td>
<td>1971</td>
<td>Not Eligible</td>
</tr>
</tbody>
</table>
## Table 2: Documented Historic Architecture Resources within the APE

<table>
<thead>
<tr>
<th>No.</th>
<th>SHPO Resource No.</th>
<th>Address</th>
<th>Resource Name</th>
<th>Architectural Style / Period</th>
<th>Date of Construction</th>
<th>NRHP Evaluation</th>
<th>Eligibility</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>30.</td>
<td>B11972</td>
<td>955 Skaggs Circle</td>
<td>William Burris House</td>
<td>Post WW II, Contemporary Folk, double-wide manufactured home</td>
<td>1966</td>
<td>Not Eligible</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>31.</td>
<td>B11973</td>
<td>5051 Sagebrush Drive</td>
<td>Oliver and Beth Maddox House/Patricia Mitchell House</td>
<td>Post WW II, Contemporary Folk, mobile home with large addition</td>
<td>1961</td>
<td>Not Eligible</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>32.</td>
<td>B11974</td>
<td>4870 Skaggs Circle</td>
<td>Mary McGuire House/Richard N. &amp; Carol S. Paris House</td>
<td>Post WW II, Contemporary Folk, double-wide manufactured home</td>
<td>1963</td>
<td>Not Eligible</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>33.</td>
<td>B11975</td>
<td>7900 Pyramid Way</td>
<td>Pyramid &amp; Bank Produce Shed/Naniloa Investment Co. Produce Shed</td>
<td>No style/vernacular</td>
<td>1925</td>
<td>Not Eligible</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>34.</td>
<td>B11976</td>
<td>5045 Sunflower Drive</td>
<td>Anthony Avellano House/Phillip &amp; Anita Tate House</td>
<td>Post WW II, Contemporary Folk, single-wide manufactured home</td>
<td>1971</td>
<td>Not Eligible</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>35.</td>
<td>B11977</td>
<td>6550 Pyramid Way</td>
<td>Oasis Mobile Estates</td>
<td>Residential mobile home park</td>
<td>1965</td>
<td>Not Eligible</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>37.</td>
<td>S821</td>
<td>Sparks, NV</td>
<td>Old Pyramid Highway</td>
<td>Unknown</td>
<td>1934-1935</td>
<td>Not Eligible</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>38.</td>
<td>S828, 26Wa5352</td>
<td>Spanish Springs, NV</td>
<td>Orr Ditch</td>
<td>Irrigation ditch</td>
<td>1872</td>
<td>Previously considered eligible with contributing and noncontributing segments in multiple reports since 1993. Ditch segments within APE have been determined non-contributing to resource due to modern maintenance and improvements that have removed elements of its historic fabric. The 2011 field survey found that ditch has no integrity in areas intersected by project.</td>
<td>A, B, C</td>
<td></td>
</tr>
<tr>
<td>39.</td>
<td>B11979</td>
<td>620 Queen Way</td>
<td>Reno Arch Missionary Church/Baik Building</td>
<td>N/A</td>
<td>N/A</td>
<td>Determined Not Eligible in 2013 under a separate project (Pyramid Way and McCarran Boulevard Intersection Improvement Project)</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>40.</td>
<td>B11987</td>
<td>560 Queen Way</td>
<td>Sparks Christian Church</td>
<td>N/A</td>
<td>N/A</td>
<td>Determined Not Eligible in 2013 under a separate project (Pyramid Way and McCarran Boulevard Intersection Improvement Project)</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>
Table 2: Documented Historic Architecture Resources within the APE

<table>
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<tr>
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<th>Date of Construction</th>
<th>NRHP Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>41</td>
<td>B11980</td>
<td>5745 Wedekind Road</td>
<td>Matthew H. Gibbons House/Van Meter House</td>
<td>N/A</td>
<td>N/A</td>
<td>Determined Not Eligible in 2013 under a separate project (Pyramid Way and McCarran Boulevard Intersection Improvement Project)</td>
</tr>
</tbody>
</table>

Note: Row shading is intended to associate historic districts with their contributing features and to differentiate the three historic districts.
Historic Architecture Resource Effect Recommendations

Following are effect determinations made for historic architecture resources as a result of construction of the Arterial Alternatives, based on the current preliminary level of design. The Arterial Alternatives were fully described in Attachment A of our April 19, 2017 letter to your office (attached). As you know, effect determinations for the three NRHP-eligible historic districts included in the list below were evaluated and included in the project-specific Programmatic Agreement (PA) that your office helped develop. However, the project-specific PA has been set aside and the 2014 Transportation PA is now being used for this undertaking. Based on results of the visual impact analysis (described later in this section) conducted for the Arterial Alternatives, as well as the traffic noise, air quality, and cumulative analyses conducted under the Final EIS currently being prepared, the effect recommendations for the three historic districts have changed from those noted in previous consultation.

1. **Sierra Vista Ranch Historic District (SHPO Resource No. D93):** The design of all Arterial Alternatives is the same in the vicinity of this historic district. No direct impacts would occur to this resource or its contributing features under the Arterial Alternatives. Design changes included in the Arterial Alternatives eliminated grade-separated interchanges previously proposed along Pyramid Highway north of Sparks Boulevard, including the proposed grade-separated interchange at the Pyramid Highway/Dolores Drive intersection located approximately 1,890 feet west of the northwestern boundary of this historic district (and the northwestern-most building within the district). Only at-grade improvements are proposed in the vicinity of this historic district. These include widening Pyramid Highway from four lanes to six lanes with a median with turn lanes, installing traffic signals with street lights at the Pyramid Highway/Dolores Drive intersection. For street lights, NDOT typically uses Type 7 Poles, which would be 32 feet 4 inches above the roadway surface. Each of the traffic signal poles would include a street light on top. These poles would be similar in height to the Type 7 poles. An approximate 400-foot long feeder road would be constructed running southeast from the intersection and terminating approximately 1,500 feet from the northwestern-most point of the historic boundary (see Figure 4). No retaining walls would be constructed in the vicinity of this resource. Existing vertical elements along Pyramid Highway and at the Pyramid Highway/Dolores Drive intersection include street lights, street signage, and power poles/power lines. Based on their height (32 feet, 4 inches) and thinness, street lights would not be visually distinguishable beyond approximately 800 feet. The northwestern-most boundary of the Sierra Vista Ranch Historic District (and the northwestern-most building within the district) is located approximately 1,890 feet from the Pyramid Highway/Dolores Drive intersection, which is well beyond the point where traffic signals and lighting would be visually distinguishable. As a result of design changes made under the Arterial Alternatives, the undertaking will not result in visual effects to this resource. Further, the impact assessment conducted under the Final EIS indicated that the historic district and its contributing features will not experience traffic noise, air quality, or cumulative impacts as a result of the undertaking. Therefore, the undertaking would have no indirect effects to this resource.

The ranch buildings within the historic district are eligible under Criterion C because they contain important examples of typical mid-20th century ranch house and ranch outbuilding construction, and the buildings and ranch appear to have the necessary associations to be considered eligible under Criterion A. The project would have no direct or indirect effects to the historic district or its contributing elements and, therefore, would not alter the characteristics of the historic property that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). **Therefore, FHWA recommends No Historic Properties Affected for this resource.**
2. **Trosi Family/Kiley Ranch Historic District (SHPO Resource No. D94):** All Arterial Alternatives propose a grade-separated interchange at Pyramid Highway/Sparks Boulevard, with Pyramid Highway crossing over Sparks Boulevard. No direct impacts would occur to this resource or its contributing features under the Arterial Alternatives. Proposed improvements include the following:

   a. A grade-separated interchange and interchange entry and exit ramps would be constructed to provide access between Pyramid Highway and Sparks Boulevard. At-grade improvements include a four or six-lane Pyramid Highway (depending on the alternative), and minor improvements to Sparks Boulevard where it ties into the proposed improvements at Pyramid Highway. Sparks Boulevard would remain at existing grade. The proposed Pyramid Highway bridge roadway surface would vary in elevation, at a maximum height of 25 feet above the Sparks Boulevard road surface. The bridge would be eight feet thick to allow for a standard 16-foot clearance. The bridge edges would be lined with a 42-inch-tall solid concrete railing in accordance with NDOT standards.

   b. Earthen slopes, not retaining walls, would be used for the bridge and ramps associated with the Pyramid Highway/Sparks Boulevard interchange. A retaining wall approximately 800 feet long would be built along Pyramid Highway between Golden View Drive and Kiley Parkway to minimize right-of-way acquisitions under Arterial Alternatives 2 and 4. The retaining wall would have an average height of approximately 6 feet, with a maximum height of approximately 13 feet.

   c. Street lighting would also be installed. NDOT typically uses Type 7 Poles for this type of interchange. The pole height would be 32 feet 4 inches above the roadway surface. Three poles would be placed at each ramp gore, for a total of 12 poles. Additional light poles would be placed along Sparks Boulevard and Highland Ranch Parkway approaching the interchange, similar to those present today. No lights would be installed on the bridge itself, and high mast lighting is not anticipated due to the rural residential setting. The approximate heights of the light poles for the ramps at their proposed location above the existing ground would be as follows (note that the heights listed below include both the pole height and proposed roadway improvements and represent the tallest elements at the interchange):
      - Northbound off-ramp: 52 feet
      - Northbound on-ramp: 50 feet
      - Southbound off-ramp: 41 feet
      - Southbound on-ramp: 43 feet

   d. Two traffic signals would also be installed – one at each interchange intersection. Each of the signal poles would include a street light on top. These poles would be similar in height to the Type 7 poles. The elevation of the signals and lights would be very similar to those at the existing Sparks Boulevard intersection.

   e. Signing would also be installed in advance of the interchange. Overhead signs would be placed in advance of the ramp exits. The tops of these signs would be approximately 25 feet above the roadway surface.

A visual analysis of proposed improvements in proximity to this historic resource was conducted in early 2017 based on the Arterial Alternative designs. The analysis involved preparing a photo visual simulation of proposed improvements as viewed from the northwestern boundary of the historic district and measuring the distance between the historic district and proposed improvements. Existing vertical elements at the Pyramid Highway/Sparks Boulevard interchange and along Pyramid Highway include traffic signals with street lights on top, street light poles,
street signs, and power poles/power lines. Existing vertical elements along Sparks Boulevard include street lights and roadside and median commercial landscaping in the form of trees and shrubs. The visual analysis found that the proposed improvements described above would be visually indistinguishable from the northwestern boundary of the ranch located approximately 800 feet southeast of the interchange (see Figure 6). Therefore, the proposed interchange and retaining wall along Pyramid Highway would be visually indistinguishable from the northernmost buildings within the district (which are located approximately 1,165 away from the interchange), and would not result in visual effects to this resource. The existing street lighting along Pyramid Highway and Sparks Boulevard, the more distant light effects from residential developments, and lights from vehicles traveling along Pyramid Highway and Sparks Boulevard currently result in nighttime light effects to the historic district. The additional nighttime light effects associated with the proposed traffic and street lights are not anticipated to be considerable compared to existing conditions. Further, the impact assessment conducted under the Final EIS indicated that the historic district and its contributing features would not experience traffic noise, air quality, or cumulative impacts as a result of the undertaking. Therefore, the undertaking would have no indirect effects to this resource.

The historic district is eligible under Criteria A and C because it is associated with the theme of small farms and ranches that made a significant contribution to the evolution of local farming and ranching. The physical characteristics of the farm/ranch are present, and the buildings are in their original location, with no additions or modifications that impair the quality of design, materials, and workmanship (historic fabric). Further, the historic district retains integrity of location, design, setting, materials, workmanship, and feeling. The project would have no direct or indirect effects to the historic district or its contributing elements and, therefore, would not alter the characteristics of the historic property that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Therefore, FHWA recommends No Historic Properties Affected for this resource.

FHWA is aware of a planned Kiley Ranch North Phase Three Development that was approved by the City of Sparks in January 2013 (see attached), which would redevelop the entire Trosi/Kiley Ranch Historic District as residential and/or commercial uses. This proposed development is occurring completely independent of the Pyramid Highway/US 395 Connector project, and such development would occur whether or not the proposed Pyramid Highway/US 395 Connector project was constructed. While the proposed Kiley Ranch development is not associated with this undertaking, RTC and NDOT will provide documentation for the Trosi/Kiley Ranch Historic District that was prepared under Section 106 consultation conducted for this undertaking to the City of Sparks for their information and to use as they see fit.

3. Iratcabal Farm Historic District (SHPO Resource No. D95): No direct impacts would occur to this resource or its contributing features. Proposed improvements closest to this historic district include minor widening of Disc Drive between Pyramid Highway and Vista Boulevard, and a grade-separated interchange at or west of (depending on the alternative) Pyramid Highway at Disc Drive. A visual analysis was conducted in early 2017 based on the Arterial Alternative designs that consisted of evaluating views toward proposed improvements from the northern and western boundaries of the historic district. It was found that the proposed at-grade improvements along Disc Drive located approximately 1,260 feet (0.24 mile) north of this resource, and the proposed Pyramid Highway/Disc Drive grade-separated interchange, which would be located no closer than approximately 5,500 feet (1.04 mile) west of the historic district, would not be visually distinguishable from this historic district and its contributing features (see Figure 7 and Figure 8). Further, the impact assessment conducted under the Final EIS has determined that the historic district and its contributing features would not experience traffic noise, air quality, or cumulative impacts as a result of the undertaking. Therefore, the undertaking would have no
indirect effects to this resource.

The historic district is eligible under Criterion A because it is associated with mid-20th century Spanish Springs Valley farming and ranching and the theme of small farms and ranches that made a significant contribution to the evolution of local farming and ranching. The historic district is eligible under Criterion C as representative of the construction methods and materials common to western Nevada ranches of the early to mid-20th century. The project would have no direct or indirect effects to the historic district or its contributing elements and, therefore, would not alter the characteristics of the historic property that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Therefore, FHWA recommends No Historic Properties Affected for this resource.

4. **Prosser Valley Ditch (SHPO Resource Nos. S820, WA5234, and WA6134):** This resource is evaluated as both a historic architecture and archaeological resource. The impacts to Segment C of this ditch were outlined and illustrated in our June 19, 2017 letter to your office and are summarized here. All Arterial Alternatives would directly impact Segment C of this resource located south of Dandini Boulevard at one location due to construction of a 10-foot-wide shared-use path across the ditch. To avoid new impacts to the ditch, the original path alignment was moved approximately 100 feet to the west to cross the ditch at an area that has been obliterated by a dirt road created by informal recreational vehicle use. The shared-use path would be constructed in this area slightly above the existing ground level in order to traverse the hilly terrain and maintain the five percent grade required for the path. Gentle earthen slopes would spread out a maximum of 8 feet on each side of the path where it crosses the ditch to provide a transition from the path elevation to the existing ground level. Because the existing ditch has been obliterated in this area, no bridge or culvert would be needed for the path crossing to maintain the original ditch contours. Therefore, the path would be constructed with minor grading, which would reduce visual effects compared to structural crossings. The path would result in approximately 30 feet of permanent impacts to the ditch, with an additional 5 linear feet on each side of the path temporarily impacted during construction. The slopes and all temporarily disturbed areas along the new path would be revegetated consistent with the surrounding natural terrain. Areas of the ditch temporarily impacted by path construction would be returned to preconstruction conditions, including regrading and reseeding.

Alternate alignments for the east-west trending shared-use path were evaluated; however, because the Prosser Valley Ditch trends north-south, no alternative could avoid crossing the ditch. Further, alternate path alignments would cross the ditch in areas where it has not been obliterated, and would require construction of a bridge or the installation of a culvert to preserve the existing shape of the ditch. Please refer to our June 19, 2017 letter for details about alternatives considered to avoid impacts to the ditch and reasons that the alternatives were eliminated.

In addition, the new path would block access to the existing dirt road that has damaged the path at the proposed crossing location, and would also block access to another dirt road that crosses the ditch approximately 400 feet to the north. By blocking these accesses, the path would discourage continued off-road vehicle damage to the path in those areas, thus helping to preserve Segment C of the ditch.

The Prosser Valley Ditch is eligible for the NRHP under Criteria A and B for its association with speculative irrigation and land development projects attempted in Nevada in the late 19th and early 20th centuries, and its association with local business leaders and politicians and their attempts to use irrigation as a vehicle for land speculation. The physical condition of the ditch is poor, has been completely obliterated in several areas, and has no significant water engineering
features or characteristics and is, therefore, not eligible under criterion C. The path would introduce visual changes to Segment C of the ditch and surrounding area from the construction of a pathway across the ditch and through the undeveloped area surrounding the ditch, as well as the installation of a safety railing at the steep slope for path user safety. However, these visual effects are considered minor considering that the visual setting of the ditch has already been compromised by numerous off-road paths and dirt roads that have been cut into the undeveloped slopes and through the proposed pathway location by off-road recreational vehicle use. As such, the path would not alter the association characteristics that qualify Segment C as a contributing feature of the NRHP-eligible ditch. The ditch would continue to convey its association with local business leaders and politicians associated with the speculative irrigation and land development in the late 19th and early 20th centuries that render the ditch NRHP eligible under Criterion B. Impacts to Segment C of the Prosser Valley Ditch would not alter the association characteristics of the entire historic linear resource that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Thus, FHWA recommends No Adverse Effect for this resource.

5. Orr Ditch (SHPO Resource Nos. S828, 26Wa5352): All Arterial Alternatives would intersect certain segments of the ditch within the APE. However, those intersected segments have been determined to lack integrity and are non-contributing elements to the resource (see Figure 2 and the Architectural Inventory Report for details). Because the project would impact non-contributing elements of the ditch, the project would not alter the characteristics of the historic linear resource that qualify it for inclusion in the NRHP (36 CFR 800.16[i]). Therefore, FHWA recommends No Historic Properties Affected for this resource.

F. Summary of Previous NRHP Eligibility Recommendations for Archaeological Resources and Effect Recommendations

Archaeological Resource Eligibility Recommendations

In our September 9, 2015 letter, FHWA and NDOT consulted with your office regarding eligibility determinations for archaeological resources within the Preferred Alternative footprint plus 100-foot buffer. As noted earlier in this letter, Arterial Alternative 3 has been identified as the Preferred Alternative, which has the same design and alignment as Revised Alternative 3, the previously identified Preferred Alternative for which the 2014/2015 intensive pedestrian archaeological survey was conducted. As such, the eligibility determinations for archaeological resources remain unchanged from those noted in our September 9, 2015 letter. This section summarizes NRHP eligibility determinations for archaeological resources as outlined in that letter and documented in A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (WCRM, 2015). Please refer to those two documents for details.

In your October 14, 2015 response letter, you did not indicate your position on the NRHP eligibility recommendations for archaeological resources, and requested a copy of the File and Literature Search and Preliminary Field Survey: Archaeological Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (March 5, 2012; Revised May 17, 2012). A copy of that report is attached.

The 2014/2015 intensive survey identified 62 previously unrecorded archaeological sites and 40 isolated finds, and an attempt was made to revisit 21 previously recorded sites. Of the 62 previously unrecorded sites, 59 sites are recommended Not Eligible and three are recommended Eligible for the NRHP. Of the 21 previously recorded sites, four are isolated artifacts and are categorically Not Eligible for the NRHP, six sites no longer exist, six sites have been determined Not Eligible for the NRHP, four sites are recommended Not Eligible for the NRHP, and one site has been determined Eligible for the NRHP.
(Prosser Valley Ditch, which is also counted under historic architecture resources). Archaeological resources determined or recommended as Not Eligible for the NRHP are listed in Table 3.

Four archaeological sites are recommended NRHP eligible, including one irrigation ditch (Prosser Valley Ditch) and three lithic sites. The Prosser Valley Ditch is evaluated under both historic architecture and archaeological resources. The Prosser Valley Ditch is discussed under Historic Architecture Resources and is not repeated here. The other three archaeological resources are described below. Please refer to Table 4 for a summary of these four sites.

1. **Quarry/Intensive Lithic Reduction; Prospect Complex (26Wa9822):** This site is a multicomponent Prehistoric Quarry/Intensive Lithic Reduction site and Prospect Complex. Only a portion of this site was recorded because the site extends onto private property, for which access for this survey was not authorized. The site straddles an east-west trending ridge topped by an outcrop of chert boulders and extends down and across a knoll in the valley below. The large Prehistoric Quarry/Intensive Lithic Reduction site was focused on the procurement of the light gray chert toolstone exposed in boulder outcrops on site. This primary exposure contains hundreds of tested chert boulders and associated debris. Three isolated tested boulders were given feature numbers. Artifacts related to the chert quarrying activities include: 19 chert tested cobbles, five chert cores, a chert biface, and hundreds of pieces of lithic debitage. In addition, the area also has naturally occurring clear quartz crystals within the igneous bedrock stratigraphically adjacent to the chert. Seven perfectly formed clear quartz crystals were noted on site in addition to the inclusions of occasional crystals within the bedrock. An igneous bedrock anvil with deep percussion scars was noted near the crystals and may have aided in their extraction, or in the reduction of nearby chert cobbles. In addition, a well-ground milling stone was recorded. This milling stone, along with four tested cobbles, and one of the tested boulders, was located within Concentration A. The possibly historic features include six prospect pits that target the igneous/chert contact across the site. However, the only artifacts or temporally diagnostic artifacts associated with these pits are modern in age, all post-dating the 1970s. Therefore, these may be modern pits that should be considered impacts to the prehistoric site. The site is in fair condition due to modern dumping, recreational use, and possible reseeding activities on portions of the slope. Animal burrowing and slope wash down the steepest slopes have also affected spatial integrity; however, within the boulder field (quarry area) spatial integrity is intact and buried cultural remains are possible within the relatively gradual slope in the northern portion of the site. Although the site has been impacted by recreational use, dumping, historic prospecting, and possible reseeding of the slopes, it does retain its integrity of location, design, and setting. Given that this site lacks any form of temporal control, it cannot address the broad patterns of history in the project area and is recommended not eligible for the NRHP under Criterion A. The site cannot be associated with an individual and is, therefore, recommended not eligible for the NRHP under Criterion B. The site lacks features that embody distinctive characteristics of a type, period, or method of construction, or individual distinction, and is, therefore, recommended not eligible for the NRHP under Criterion C. The historic component is of unknown age and consists of prospect pits that cannot meaningfully address Mining thematic concerns. It is, therefore, recommended not eligible for the NRHP under Criterion D. However, the prehistoric component is a chert, and possibly quartz crystal quarry that can address thematic concerns regarding Lithic Technology and Procurement within the project area through geochemical sourcing. In addition, this site has some potential for buried cultural remains that may address other thematic concerns. As a result, the prehistoric component of this site is recommended eligible for the NRHP under Criterion D.

2. **Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature (26Wa9841):** This site is a multicomponent Prehistoric Quarry/Intense Lithic Reduction Site and Historic Isolated Feature (possible prospect pit) straddling a ridge spine with chert bedrock outcrops. The
focus of both prehistoric and possible historic activity is a light gray chert bedrock outcrop exposed near the top of the ridge. The surface is rocky with poorly sorted gravels and cobbles. Vegetation is sparse and includes snakeweed, bunchgrass, rabbitbrush, and shadscale. Six shallow pits are located near the top of the ridge that are likely prehistoric quarry pits, but animal burrowing has obscured the features. Conversely, these may relate to historic prospecting activities. Features include one possible historic prospect pit, two possible prehistoric quarry pits, and eight tested boulders or quarry areas. Approximately 1,500 pieces of lithic debitage were noted across the site along with cobbles and chert cores. The bulk of these are near tested boulders. The site is in fair condition with recreational impacts (e.g., abundant shotgun shells and pistol cartridges), animal burrowing, slope wash, and vehicular traffic on nearby roads. Although the site has been impacted by recreational use and animal burrowing, it does retain its integrity of location, design, and setting. Given that this site lacks any form of temporal control, it cannot address the broad patterns of history in the project area and is recommended not eligible for the NRHP under Criterion A. The site cannot be associated with an individual and is, therefore, recommended not eligible for the NRHP under Criterion B. The site lacks features that embody distinctive characteristics of a type, period, or method of construction, or individual distinction, and is, therefore, recommended not eligible for the NRHP under Criterion C. The historic component is of unknown age and consists of a prospect pit that cannot meaningfully address mining-thematic concerns. It is, therefore, recommended not eligible for the NRHP under Criterion D. However, the prehistoric component is a chert quarry that can address thematic concerns regarding lithic technology and procurement within the project area. In addition, this site has some potential for buried cultural remains that may address other thematic concerns. As a result, the prehistoric component of site 26Wa9841 is recommended eligible for the NRHP under Criterion D.

3. Quarry/Intensive Lithic Reduction; Prospect Complex (26Wa9856): This site straddles a bedrock knoll overlooking Sun Valley. It is a multi-component site that includes a prehistoric chert quarry alongside a historic prospecting complex. The site contains two prehistoric lithic concentrations centered on outcrops of an orange-brown lustrous chert, a prehistoric quarry pit, three historic prospect pits, a cut platform, a lumber pile, and an ovate sediment-and rock mound within a rock ring that may have served as a tank foundation or other unknown purpose. Though the site contains a scatter of modern debris (including bottle glass, plastic, and cans), no items were found in the general site area that could be determined historic. However, a 1966 aerial photograph shows fresh excavated prospect pits, which could be mid- to late-twentieth century age. Concentration A has chert densities estimated at over 1000 pieces per square meter. Concentration A has been impacted by mid-twentieth century prospecting with a large pit excavated into the same chert vein. Concentration B contains the prehistoric quarry pit. An adjacent mid-twentieth century prospect pit again seems to have targeted the chert vein adjacent to the concentration. Chert densities within Concentration B were also estimated to over 1000 pieces per square meter. The condition of the site is fair. Modern two-tracks, ATV tracks, and trash indicate frequent recreational use at the site. In addition, a power line crosses east-west through the northern portion of the site, which is also truncated by a housing development. The historic prospecting complex is of mid-twentieth century age given the presence of two freshly excavated prospect pits evident on the 1966 aerial photo of the area. As such, the historic component cannot address mining-thematic concerns identified for this area. It post-dates the period of significance (1896-1920) for the Wedekind Mining District and does not contain the types of features necessary to address questions important to our understanding of mining technology. Therefore, the historic component of this site cannot address historic patterns identified as important and does not satisfy NRHP Criterion A requirements. The site cannot be associated with an individual and is, therefore, recommended not eligible for the NRHP under Criterion B. The site does not contain unique or emblematic feature types necessary to address
NRHP Criterion C, and the historic component of the site does not have further data potential (Criterion D). Therefore, the historic component of this site is recommended not eligible for any NRHP criteria. The prehistoric component does not contain the temporally distinct artifact types necessary to address changes in broad patterns through time and is, therefore, recommended not eligible for the NRHP under Criterion A. The site cannot be associated with an individual and is, therefore, recommended not eligible for the NRHP under Criterion B. The only prehistoric feature on site is a simple pit that is not unique or emblematic, and the prehistoric component is, therefore, recommended Not eligible for the NRHP under Criterion C. However, the prehistoric component does contain a quarry pit targeting a natural chert vein. Although sediments here are generally shallow, some subsurface potential exists within the quarry pit, which may reveal unique quarrying methods. As such, the prehistoric component may be able to further our understanding of Lithic Procurement in the region. As such, the prehistoric component of this site is recommended eligible for the NRHP under Criterion D for its data potential.

Table 3: Archaeological Resources Not Eligible for the NRHP

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Resource Name and/or Type</th>
<th>Eligibility Determination/Recommendation</th>
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<tr>
<td>26Wa3408</td>
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</tr>
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</tr>
<tr>
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<td>26Wa9845</td>
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<td>26Wa9846</td>
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<td><strong>Newly Recorded Sites</strong></td>
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<td>Simple Lithic Assemblage</td>
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<td>State #</td>
<td>BLM#</td>
<td>Site Temporal Affiliation/Component</td>
<td>Resource Name and/or Type</td>
<td>Eligibility Determination/Recommendation</td>
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<td>26Wa9777</td>
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<td>Prospect Complex</td>
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</tr>
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<td>26Wa9782</td>
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<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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<td>26Wa9783</td>
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<td>Non-Significant/Not Eligible</td>
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<tr>
<td>26Wa9791</td>
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<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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<tr>
<td>26Wa9794</td>
<td>CrNV-03-9637</td>
<td>Prehistoric; Unknown/Multicomponent</td>
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<td>26Wa9809</td>
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<td>Historic</td>
<td>Prospect Complex</td>
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Table 3: Archaeological Resources Not Eligible for the NRHP

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<tr>
<td>26Wa9853</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
</tr>
<tr>
<td>26Wa9854</td>
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<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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<tr>
<td>26Wa9861</td>
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<td>Prehistoric Isolated Artifact; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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<tr>
<td>26Wa9862</td>
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<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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</table>
Table 4: Archaeological Resources Eligible for the NRHP

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<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Resource Name and/or Type</th>
<th>NRHP Eligibility Evaluation</th>
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<tbody>
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<td>S820,</td>
<td>CrNV-31-4843</td>
<td>Historic</td>
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<td></td>
</tr>
<tr>
<td>Wa5234,</td>
<td>Wa6134</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Previously determined eligible in 1995.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>One contributing segment and two non-contributing segments.</td>
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</tr>
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<td></td>
</tr>
<tr>
<td>Newly Recorded Sites</td>
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</tr>
<tr>
<td>26Wa9822</td>
<td>CrNV-03-9665</td>
<td>Prehistoric; Historic/ Multi-component</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component - Recommended Eligible (Criterion D); Historic component – Not Eligible</td>
</tr>
<tr>
<td>26Wa9841</td>
<td>N/A</td>
<td>Prehistoric; Historic/ Multi-component</td>
<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature</td>
<td>Prehistoric Component - Recommended Eligible (Criterion D); Historic component – Not Eligible</td>
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<tr>
<td>26Wa9856</td>
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<td>Prehistoric; Historic/ Multi-component</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component - Recommended Eligible (Criterion D); Historic component – Not Eligible</td>
</tr>
</tbody>
</table>

Archaeological Resource Effect Recommendations
Following are effect recommendations for NRHP-eligible archaeological resources as a result of construction of the Preferred Alternative (Arterial Alternative 3). Where they differ, the project impacts and effect recommendations described in this letter supersede those described in previous Section 106 correspondence and survey reports.

The Preferred Alternative would potentially impact three archaeological sites determined eligible for the NRHP under Criterion D (summarized immediately following this paragraph), and one archaeological site (Prosser Valley Ditch) eligible under NRHP Criteria A and B. Impacts to Prosser Valley Ditch under the Preferred Alternative cannot be avoided; refer to the discussion for Prosser Valley Ditch under historic architecture resources earlier in this letter. The study team evaluated the Preferred Alternative alignment to determine if impacts to the other three archaeological sites could be avoided or minimized. Results of that analysis and resultant effect determinations are summarized below. Please refer to our September 19, 2015 letter and the A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (WCRM, 2015) for details.

4. Quarry/Intensive Lithic Reduction; Prospect Complex (26Wa9822): This site is located within the Preferred Alternative disturbance footprint and would be directly impacted by construction of the US 395 Connector, involving excavation, grading, and paving. It was found that moving the Preferred Alternative alignment to avoid or minimize impacts to this site is not feasible or practical. Due to the topographic conditions, any alignment shift would greatly increase earthwork and project costs, and would increase visual, habitat and water quality effects. Because this site cannot be avoided, FHWA recommends an Adverse Effect to this resource.

5. Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature (26Wa9841): This site is located within the Preferred Alternative disturbance footprint and would be directly impacted by construction of the US 395 Connector, involving excavation, grading, and paving. It was found that moving the Preferred Alternative alignment to avoid or minimize impacts to this site is not feasible or practical. Due to the topographic conditions, any alignment shift would greatly increase earthwork and project costs, as well as increase visual, habitat and water quality
effects. Because this site cannot be avoided, FHWA recommends an *Adverse Effect* to this resource.

6. **Quarry/Intensive Lithic Reduction; Prospect Complex (26Wa9856):** This site is located within the Preferred Alternative disturbance footprint and would have been directly impacted by construction of the US 395 Connector. However, it was determined that impacts to this site can be avoided by minor design modifications, such as slightly steeping the slope. Therefore, FHWA recommends *No Historic Properties Affected* for this resource.

**G. Summary of Effect Recommendations for Historic Architecture and Archaeological Resources**

Effect recommendations for NRHP-eligible resources are summarized in Table 5.

**Table 5: Summary of Effect Determinations**

<table>
<thead>
<tr>
<th>NRHP-Eligible Resource</th>
<th>Effect Recommendation</th>
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<tbody>
<tr>
<td>Sierra Vista Ranch Historic District (SHPO Resource No. D93)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Trosi Family/Kiley Ranch Historic District (SHPO Resource No. D94)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Iratcabal Farm Historic District (SHPO Resource No. D95)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Prosser Valley Ditch (SHPO Resource Nos. S820, WA5234, WA6134)</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>Orr Ditch (SHPO Resource Nos. S828, 26Wa5352)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9822)</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature (SHPO Resource No. 26Wa9841)</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9856)</td>
<td>No Historic Properties Affected</td>
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</tbody>
</table>

**Determination of Effect for Undertaking**
The undertaking would result in *No Historic Properties Affected* for four historic architecture resources (Sierra Vista Ranch Historic District, Trosi Family/Kiley Ranch Historic District, Iratcabal Farm Historic District, and Orr Ditch), and *No Adverse Effect* to one historic architecture/archaeological resource (Prosser Valley Ditch). The undertaking would result in an *Adverse Effect* to two archaeological resources and *No Historic Properties Affected* to one archaeological resource. Therefore, FHWA has determined that the undertaking will result in an overall *Adverse Effect*.

**H. Notification of Section 4(f) Approach**

**Notification of Section 4(f) De Minimis**
The undertaking has been determined to have *No Adverse Effect* to the Prosser Valley Ditch (SHPO Resource Nos. S820, WA5234, and WA6134). Based on the foregoing, FHWA may make a *de minimis* finding for the Section 4(f) requirements for this property based on your concurrence with the *No Adverse Effect* determination. A *de minimis* impact involves the use of a Section 4(f) property that is generally minor in nature. For historic properties, a *de minimis* impact is one that results in a Section 106 determination of *No Adverse Effect* or *No Historic Properties Affected*.

**Section 4(f) Exception (23 CFR 774.13[b])**
Based on the foregoing information and findings in the *A Class III Cultural Resources Inventory of the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada* (WCRM, 2015), FHWA has
concluded that sites 26Wa9822, 26Wa9841, and 26Wa9856 are important chiefly because of what can be learned by data recovery and have minimal value for preservation in place.

I. Request for Concurrence with Indirect APE, Eligibility and Effect Recommendations, and request for Acknowledgement of Section 4(f) Approach

We respectfully request your review and concurrence with the Indirect APE that has been modified as you requested in your September 6, 2017 letter, and review and concurrence with the eligibility and effect determinations and recommendations for historic architecture and archaeological resources described above. We also request your written acknowledgement of the de minimis notification and written acknowledgement that you do not object to the finding that sites 26Wa9822, 26Wa9841, and 26Wa9856 are important chiefly because of what can be learned by data recovery and have minimal value for preservation in place. This information has also been forwarded concurrently to the following consulting parties for review: Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California, and BLM. We will notify you of any responses received from these groups. We look forward to your review and comment, and moving forward towards the Memorandum of Agreement.

Sincerely,

C. Cliff Creger
Chief Cultural Resources Program Manager

Enclosures:

- Figures:
  - Figure 1: Direct and Indirect APEs on USGS Topographic Map
  - Figure 2: Direct and Indirect APEs and NRHP-eligible Historic Architecture Resources within the APE
  - Figure 3: Indirect APE and Arterial Alternative Elements on Aerial with Photo Locations
  - Figure 4: Arterial Alternative Footprints in Vicinity of Sierra Vista Ranch Historic District
  - Figure 5: Arterial Alternative Footprints in Vicinity of Trosi Family/Kiley Ranch Historic District
  - Figure 6: Visual Simulation of Arterial Alternatives Viewed from Trosi Family/Kiley Ranch Historic District
  - Figure 7: Arterial Alternative Footprints in Vicinity of Iratcabal Farm Historic District
  - Figure 8: Views of Proposed Improvement Areas from Iratcabal Farm Historic District
  - Figure 9: Prosser Valley Ditch Segments A, B, and C within APE
- File and Literature Search and Preliminary Field Survey: Archaeological Inventory of the Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada (March 5, 2012; Revised May 17, 2012)
- A Class III Cultural Resources Inventory or the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada (WCRM, 2015)
- Table A: Viewshed Photos, by Segment
- Kiley Ranch North Phase Three Development Plan, 2013
- Section 106 Correspondence
Figure 1: Direct and Indirect APEs on USGS Topographic Map

(separate PDF file – this is USGS topo map with both APEs on it, with newly added areas to Indirect APE numbered)
Figure 3: Indirect APE and Arterial Alternative Elements on Aerial with Photo Locations

(separate PDF file with project elements coded, segments labeled, and photo locations labeled)
Figure 6: Visual Simulation of Arterial Alternatives Viewed from Trosi Family/Kiley Ranch Historic District

Existing view from northwest boundary of Trosi/Kiley Ranch Historic District looking northwest toward proposed Pyramid Highway/Sparks Boulevard grade-separated interchange – a distance of approximately 800 feet.

Photo source: Google Streetview

Visual simulation of Pyramid Highway/Sparks Boulevard grade-separated interchange as viewed from northwest boundary of Trosi/Kiley Ranch Historic District – a distance of approximately 800 feet.

Photo source: Google Streetview
Figure 7: Arterial Alternative Footprints in Vicinity of Iratecabal Farm Historic District
Figure 8: Views of Proposed Improvement Areas from Iratcabal Farm Historic District

Photo source: Google Streetview
View from northern portion of the Iratcabal Farm Historic District looking north toward Disc Drive (not visible in background).

This power pole is approximately located at Disc Drive/Sparks Blvd intersection.

Photo source: Google Streetview
View from northern portion of the Iratcabal Farm Historic District looking northwest toward the Pyramid Highway/Disc Drive intersection (not visible in background).
Figure 9: Prosser Valley Ditch Segments A, B, and C within APE

Overview: Study Area

Legend
- Ditches and Streams
- Prosser Valley Ditch

Segment A
Segment B
Segment C
Ms. Rebecca Palmer
State Historic Preservation Officer
Nevada State Historic Preservation Office
901 S. Stewart Street, Suite 5004
Carson City, Nevada 89701-4285

RE: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
Completion of Determinations of Eligibility and Effects for Historic Architecture and Archaeological Resources
EA 73390 & 73391; NDOT #WA11-009; FHWA # DE-0191(065) & DE-019(067);
SHPO Undertaking # 2010-0884; SHPO Report # 8041

Dear Ms. Palmer:

Thank you for your November 17, 2017 letter, wherein you concurred with the Indirect Area of Potential Effects (APE) established for the above-referenced undertaking, noted your concurrence with eligibility determinations for historic architecture resources, concurred with eligibility determinations made for certain archaeological resources, and posed questions and requests regarding documentation for archaeological resources. Thank you for the concurrences noted in your letter.

The purpose of this letter is to respond to the requests and questions in your November 17, 2017 letter, which are enumerated below, with responses provided under each. Information previously provided to your office that differs from that provided in this letter is superseded by this letter.

1. The SHPO assumes that the direct APE, as illustrated in Figure 1, has been completely surveyed (e.g., Class III) for archaeological resources for this undertaking pursuant to Stipulation V.C of the Programmatic Agreement (PA). If this is not the case, please notify this office at your earliest convenience. Response: Your assumption is correct.

2. The site form for 26Wa6543 states "On November 14, 2014, archaeologists from WCRM attempted to revisit the site. They found it had been destroyed as a result of pre-construction earth moving activities and a large hole is present where the site was located." Please provide additional clarification with regards to these pre-construction activities. Response: The pre-construction activities noted on the site form are not associated with this undertaking. The site form has been modified to clarify this and is attached. It is not known for what project those observed activities are associated.

3. The SHPO notes that the site form for 26Wa6999 is missing from the subject documents. Upon receipt of this site form the SHPO will resume its review of NDOT's NRHP eligibility determination. Response: The site number is Wa6966 (SHPO transposed the number in the November 17, 2017 letter). The site form for 26Wa6966 is attached.

4. The SHPO notes that the site forms for the following archaeological resources are incomplete. Upon receipt of the missing information, the SHPO will resume its review of NDOT's NRHP eligibility determinations:
Ms. Rebecca Palmer  
State Historic Preservation Officer  
Nevada State Historic Preservation Office  
901 S. Stewart Street, Suite 5004  
Carson City, Nevada 89701-4285

Dear Ms. Palmer:

Thank you for your November 17, 2017 letter, wherein you concurred with the Indirect Area of Potential Effects (APE) established for the above-referenced undertaking, noted your concurrence with eligibility determinations for historic architecture resources, concurred with eligibility determinations made for certain archaeological resources, and posed questions and requests regarding documentation for archaeological resources. Thank you for the concurrences noted in your letter.

The purpose of this letter is to respond to the requests and questions in your November 17, 2017 letter, which are enumerated below, with responses provided under each. Information previously provided to your office that differs from that provided in this letter is superseded by this letter.

1. The SHPO assumes that the direct APE, as illustrated in Figure 1, has been completely surveyed (e.g., Class III) for archaeological resources for this undertaking pursuant to Stipulation V.C of the Programmatic Agreement (PA). If this is not the case, please notify this office at your earliest convenience.

   Response: Your assumption is correct.

2. The site form for 26Wa6543 states "On November 14, 2014, archaeologists from WCRM attempted to revisit the site. They found it had been destroyed as a result of pre-construction earth moving activities and a large hole is present where the site was located." Please provide additional clarification with regards to these pre-construction activities. Response: The pre-construction activities noted on the site form are not associated with this undertaking. The site form has been modified to clarify this and is attached. It is not known for what project those observed activities are associated.

3. The SHPO notes that the site form for 26Wa6999 is missing from the subject documents. Upon receipt of this site form the SHPO will resume its review of NDOT’s NRHP eligibility determination. Response: The site number is Wa6966 (SHPO transposed the number in the November 17, 2017 letter). The site form for 26Wa6966 is attached.

4. The SHPO notes that the site forms for the following archaeological resources are incomplete. Upon receipt of the missing information, the SHPO will resume its review of NDOT’S NRHP eligibility determinations:
a. 26Wa7123 - updated site photos are missing from the subject documents illustrating that this site has been substantially altered since the last recording, which did include photographs, in 2003. Please provide the missing photo-documentation showing the altered state of this site. Response: Updated site photos and photo log for this resource are attached to this letter and labeled with the resource's site number.

b. 26Wa8267 (CrNV-03-5834) - updated site photos are missing from the subject documents illustrating that this site has been substantially altered since the last recording, which did include photographs, in 2003. Please provide the missing photo-documentation showing the altered state of this site. Response: Updated site photos and photo log for this resource are attached to this letter and labeled with the resource's site number.

c. 26Wa9785 (CrNV-03-9628) - the site sketch map provided was copied incorrectly. Thus, much of the information is obscured and illegible. Please provide a complete and legible copy of the site sketch map. Response: A complete and legible copy of the sketch map for resource 26Wa9785 (CrNV-03-9628) is attached.

5. The SHPO cannot concur that 26Wa9793 (CrNV-03-9636) is not eligible for listing in the NRHP as it was not evaluated under an appropriate historic context or research design. This resource seems to have been incorrectly categorized under the Property Type of a "Prospect Complex," which falls under the theme of Mining. As this site seems to be related to the Theme of "Settlement and Community Development" dating to the post-WWII urbanization of Sparks, this current categorization and the resultant evaluation does not apply. Upon receipt of an updated report that is expanded under the Theme of Settlement and Community Development (which would include defining Property Types, research questions, etc.), the SHPO will resume its review of NDOT's NRHP eligibility determination. Response: In response to your comment, the documentation for this site was carefully evaluated, and we agree that the resource was incorrectly categorized. It has, therefore, been reevaluated as a mining complex and refuse dump. The report includes an appropriate historic context for these property types. The site form for this resource was updated and is attached. The report was modified where appropriate, and report replacement pages are attached.

6. The SHPO cannot concur that 26Wa9837 is not eligible for listing in the NRHP as the resource has not been completely documented. Given what has been documented within the direct APE for this archaeological resource (i.e., substantial impacts due to flooding), the SHPO would concur that recorded portions do not embody any of the Secretary's Significance Criteria (i.e., A-D, inclusive). Please note that unidentified sections of the site remain unevaluated. Response: We have changed the eligibility recommendation for this site to unevaluated. The recorded portion of the site falls within the project's direct APE and will be affected by the undertaking. It does not, however, include archaeological features or artifacts that could contribute to the site's NRHP eligibility under the Secretary's Significance Criterion D due to a lack of integrity. The unidentified portion of the site remains unevaluated. The previous determination of No Historic Properties Affected for this resource remains valid.

7. As the following linear cultural resources are not fully recorded, the SHPO would concur with NDOT's determination that the recorded portions do not embody any of the Secretary's Significance Criteria (i.e., A-D, inclusive). Please note that unidentified sections of these sites remain unevaluated: 26Wa9818/ CrNV-03-9661, 26Wa9832, 26Wa9847, 26Wa9854, 26Wa9855. Response: We concur and affirm herein that unidentified sections of the above-referenced sites remain unevaluated.
8. Regarding 26Wa9822 (CrNV-03-9665), it appears to SHPO that the direct effects of this undertaking will avoid the portions of the site that have the potential to contribute under the Secretary's Significance Criterion D. The southern portion of the site that will be affected by this undertaking does not include archaeological features that could contribute to the site's NRHP eligibility under the Secretary's Significance Criterion D due to a lack of potential for intact buried deposits and the secondary nature of these artifacts due to slopewash. 

Response: We greatly appreciate your review of impacts to this resource. Based on your evaluation noted above, FHWA and NDOT have changed our previous Adverse Effect determination for this resource to No Adverse Effect.

Summary of Effect Recommendations
Our October 19, 2017 letter provided a table summarizing effect recommendations for NRHP-eligible resources – that table has been updated to reflect NDOT/FHWA’s application of the criteria of adverse effect to each historic property (pursuant to 36 CFR 800.5) the changed effect determination noted in Comment #8 above, and is provided below. The outcome of the application of that criteria is that 7 of the 8 historic properties identified do not contribute to the project finding of adverse effect.

Table 1: Summary of Effect Determinations

<table>
<thead>
<tr>
<th>NRHP-Eligible Resource</th>
<th>Effect Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sierra Vista Ranch Historic District (SHPO Resource No. D93)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Troisi Family/Kiley Ranch Historic District (SHPO Resource No. D94)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Iratcabal Farm Historic District (SHPO Resource No. D95)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Prosser Valley Ditch (SHPO Resource Nos. S820, Wa5234, Wa6134)</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>Orr Ditch (SHPO Resource Nos. S828, 26Wa5352)</td>
<td>No Historic Properties Affected</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9822)</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature (SHPO Resource No. 26Wa9841)</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9856)</td>
<td>No Historic Properties Affected</td>
</tr>
</tbody>
</table>

NDOT, on behalf of FHWA, has determined that the undertaking will result in a project finding of Adverse Effect. Effects to the following resources do not contribute to the adverse effect:

- Sierra Vista Ranch Historic District (SHPO Resource No. D93)
- Troisi Family/Kiley Ranch Historic District (SHPO Resource No. D94)
- Iratcabal Farm Historic District (SHPO Resource No. D95)
- Prosser Valley Ditch (SHPO Resource Nos. S820, Wa5234, Wa6134)
- Orr Ditch (SHPO Resource Nos. S828, 26Wa5352)
- Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9822)
- Quarry/Intensive Lithic Reduction; Prospect Complex (SHPO Resource No. 26Wa9856)

We respectfully request your review and concurrence with eligibility determinations and the results of our application of the criteria of adverse effect for this undertaking as described in our October 19, 2017 to your office and where updated in this letter.

FHWA will notify the Advisory Council on Historic Preservation (ACHP) of the adverse effect and invite them to participate in Section 106 consultation for this undertaking. After the ACHP responds, NDOT
and FHWA will move toward development of a Memorandum of Agreement (MOA) with all consulting parties to address the adverse effect.

This information has also been forwarded concurrently to the following consulting parties for review: Pyramid Lake Paiute Tribe, Reno-Sparks Indian Colony, and Washoe Tribe of Nevada and California, and BLM. We will notify you of any responses received from these groups. We look forward to your review and comment, and moving forward towards the MOA.

Sincerely,

[Signature]

C. Cliff Creager
Chief Cultural Resources Program Manager

Enclosures:

Updated site forms for:
- 26Wa6543
- 26Wa8267 – including updated photos and photo log
- 26Wa7123 – including updated photos and photo log
- 26Wa6966
- 26Wa9793
- 26Wa9837

Legible sketch map for site 26Wa9785

Replacement pages for report:
- Page ii: Changed the 3rd paragraph to include an unevaluated site.
- Page 47: Updated the site type for site 26Wa9793 in Table 5.
- Page 48: Updated the eligibility recommendation of site 26Wa9837 to unevaluated in Table 5.
- Page 56: Revised 4th paragraph of the description for site 26Wa6543 to reflect the site disturbance was not project related.
- Page 83: Revised the site description.
- Page 84: Revised the site description and eligibility statement.
- Page 99: Revised the recommendation of effect for site 26Wa9822 based on SHPO comments.
- Page 108: Revised eligibility recommendation for site 26Wa9837
- Page 109: Revised eligibility recommendation for site 26Wa9837
- Pages 123-129: Revised management recommendations paragraphs on pg. 123; revised Tables 6 and 7.
- Figure 3a. Revised Site Locations in Northern Portion of Project Corridor (Appendix V)
cc: Abdelmoez Abdalla, FHWA
     Jacob Waclaw, FHWA
     Dale Wegner, FHWA
     Greg Novak, FHWA
     Pyramid Lake Paiute Tribe
     Reno-Sparks Indian Colony
     Washoe Tribe of Nevada and California
     Rachel Crews, BLM
     Doug Maloy, RTC
     Jim Clarke, Jacobs
     Steve Cooke, NDOT
Appendix A:
Agency Coordination

Section 106
SHPO Correspondence
February 5, 2009

In Reply Refer To:
HENV-NV

Subject: Consultation Under the National Historic Preservation Act for Cultural Resources for the Pyramid Highway—US 395 Connection Environmental Impact Statement (EIS)

Mr. Ronald James
State Historic Preservation Officer and Historian
State Historic Preservation Office
100 N. Stewart Street
Carson City, Nevada 89701

Dear Mr. James:

The purpose of this letter is to invite the State Historic Preservation Office (SHPO) to become a consulting party under Section 106 of the National Historic Preservation Act (NHPA) and along with the Federal Highway Administration (FHWA), to identify any concerns the SHPO may have regarding the potential effects of the proposed Pyramid Highway – US 395 Connection Project on cultural resources. The purpose of the proposed project is to address regional mobility, congestion and safety challenges faced by motorists and pedestrians that travel Pyramid Highway between the Sparks urban area and Spanish Springs. The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive. It also includes an area extending more than approximately 5 miles, from east of Vista Boulevard west to Interstate 395 near the Parr/Dandini interchange. The area along Vista Boulevard to Interstate 80 also is included.

Consultation between FHWA, the Nevada Department of Transportation (NDOT), the Washoe County Regional Transportation Commission (RTC), and the SHPO led to the definition of the geographical boundary for the preliminary Area of Potential Effect (APE). Enclosed for your review is a map showing the initial APE for cultural resource study which will initially entail a detailed records search (see enclosed exhibit).

The RTC has selected Jacobs Engineering Group (Jacobs) to assist it in preparing the EIS. Western Cultural Resource Management, Inc. (WCRM), a subcontractor to Jacobs for cultural resource issues, will facilitate consultation among the City, NDOT, and FHWA. The current APE for cultural resources is for the file search only and will change once the a reduced set of alternatives have been identified and developed to greater detail, such that potential impacts can be better defined.

As part of the EIS process, potential effects on cultural resources will be determined. The information will be used in evaluation of alternatives and can be kept confidential if you so...
desire. We would appreciate the names and addresses of other persons who should be contacts for information. Please note that the appropriate Native American tribes are also being contacted.

As part of the facilitation process, WCRM will contact you by telephone within (2) weeks receipt of this letter to discuss your concerns. To facilitate your identification of questions and concerns about the project, WCRM will coordinate with FHWA to provide you with any additional information needed by you or your staff.

We look forward to your response to this invitation and your potential role as a Section 106 consulting party on this project. If you have questions or would like to discuss in more detail the project or your agency's respective roles and responsibilities during the preparation of this document, please contact me at (775) 687-1231.

Sincerely Yours,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
S. Gilbert-Young, NDOT
Doug Maloy, RTC Washoe County
Subject: Request for Concurrence on Pyramid Highway/US 395 Connection Project, Washoe County, Nevada EA: 73391

Dear Ms. Palmer:

The Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is preparing an Environmental Impact statement (EIS) for the proposed improvements to Pyramid Way (SR 445) and to construct a new corridor from Vista Boulevard to US 395 in Washoe County, Nevada. FHWA requests that you review the information provided, and concur with FHWA’s determinations for the Areas of Potential Effect for archaeological and historic architectural resources for the proposed project.

Project Purpose and Description

The purpose of the project is to relieve traffic congestion on the Pyramid Highway and provide improved east/west community connectivity from Pyramid way to US 395 and east to Vista Boulevard.

The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way to Calle de la Plata Drive. It also includes an area extending approximately 5 miles, from east of Vista Boulevard to US 395 near the Parr/Dandini interchange. The area along Vista Boulevard to US 395 is also included (see enclosed maps).

The project involves widening of the Pyramid Highway from Queen Way to Calle de la Plata Drive and construction of an interconnector highway from Pyramid Highway to US 395.

The major components of the project, including its alternatives might include:

- Construction of bridges (25’ to 28’ high) on Pyramid Highway over the following cross streets and locations:
  1. Eagle Canyon Road
  2. Delores Drive
  3. Lazy 5 Parkway
  4. Sparks Boulevard
  5. Golden View
6. Just north of Los Altos Parkway
7. Northwest of the Pyramid Highway/Disc Drive Intersection (Bridge 17B)
8. West of the Pyramid Highway/Disc Drive Intersection (Bridge 18)
9. North of the Pyramid Highway/Disc Drive Intersection (Bridge 19)

- New alignment to the Pyramid Highway that would connect Pyramid Highway with US 395, north of McCarran Boulevard and through Sun Valley.

- Construction of new local roads at the following locations:
  1. Extending Delores Drive and Tierra Del Sol Parkway to an unnamed road to the east.
  2. Connecting Blue Skies Drive with Blue Gem Circle with outlets to Evening Starr Drive and the Oasis Mobile Estate Mobile Home Park.

- Widening and improvements of roads at the following locations:
  1. Disc Drive from Pyramid Highway to the Vista Boulevard
  2. Pyramid Highway between Disc Drive and Queen Way

- Construction and substantial reconfiguration of interchanges at the following locations:
  1. US 395/Pyramid Highway interchange in the vicinity of the Parr Boulevard overpass, including five bridge structures up to 28' high
  2. Pyramid Highway, First Street and El Rancho Drive, including eight bridge structures up to 28' high

More information on the Pyramid Highway/US 395 Connection Project can be found on the project website: <http://www.pyramidus395connection.com/index.html>

Archaeology Area of Potential Effect
The archaeological Area of Potential Effect (APE), which includes the project alternatives footprint, is shown in the enclosed Archaeological APE Maps.

Historic Architectural Resource Area of Potential Effect
The historic architectural APE includes the project footprint (including the alternatives), adjacent parcels, and parcels that might be visually impacted by the project. There are 655 parcels in the APE and 617 acres (see enclosed Historic Architecture APE Maps).

If you have any questions, please feel free to call me at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: Cliff Creger, NDOT
    Doug Maloy, RTC Washoe

ec: Andrew Soderborg, FHWA
Ms. Rebecca Palmer  
Deputy Historic Preservation Officer  
State Historic Preservation Office  
100 N. Stewart Street, Capitol Complex  
Carson City, Nevada 89701

Subject: Pyramid Highway/US 395 Connection Project, Washoe County, EA: 73391; WA11-009R

Dear Ms. Palmer:

Thank you for meeting with the project team on June 16, 2011 to discuss the Pyramid Highway/US 395 Connection project. As discussed in our meeting, this letter provides additional information about the project to supplement the request for concurrence on the Area of Potential Effect (APE) sent to you May 18, 2011. Specifically, more information on project alternatives that will be evaluated in the Environmental Impact Statement (EIS) and their potential effects are included. Enclosed are maps illustrating the project alternatives and parcels within the APE where impacts to NRHP-eligible or potentially NRHP-eligible resources may occur. At this time, FHWA requests that you review the additional information provided, and concur with FHWA’s determination for the APE for Historic Architectural resources for the proposed project.

Project Description

The proposed study area extends 7.7 miles along Pyramid Highway from Queen Way north to Calle de la Plata Drive through the communities of Sparks and Spanish Springs. It also includes an area extending more than approximately 5 miles from Vista Boulevard west to US 395 near the Parr/Dandini interchange through the communities of Sparks and Sun Valley (see enclosed maps).

The project involves converting Pyramid Highway from an existing arterial\(^1\) to a freeway\(^2\) facility, arterial widening, and ancillary improvements from Queen Way to Calle de la Plata Drive, and construction of a new freeway facility and ancillary improvements from Pyramid Highway.

\(^1\) Arterial - A class of roads serving major traffic movements (high-speed, high volume) for travel between major points.
\(^2\) Freeway - A divided arterial highway designed for the unimpeached flow of large traffic volumes. Access to a freeway is rigorously controlled and intersection grade separations are required.
Highway to US 395. Moving from west to east and south to north, the major segments of the project and its alternatives are described below:

**US 395 Interchange**
Improvements involve widening to include one to two auxiliary lanes on US 395 at grade from approximately the McCarran Boulevard interchange north to approximately 1,500 feet north of the Parr / Dandini interchange. To increase interchange capacity,³ the Parr / Dandini interchange would be replaced at its existing location and grade with a similar diamond-type service interchange. In addition, a new high-speed system interchange⁵ approximately 30 feet above the Parr / Dandini interchange would connect US 395 to the Pyramid Highway to the east. No high-speed movements are proposed to the west of US 395. Refer to the enclosed Overview Map and Detail 6 and Detail 7 maps.

**Sun Valley Area**
From the US 395 system interchange, the US 395 Connector would proceed east as a six-lane freeway with sizeable cuts and fills⁶ as it crosses the Red Hills north of the Desert Research Institute. As the alignment approaches Sun Valley, it would cross over Sun Valley Boulevard by approximately 30 feet. This crossing can occur at either of two locations: 1) the north crossing at 1st Avenue parallel to an existing powerline corridor, or 2) the south crossing approximately 500 feet north of the Dandini / El Rancho intersection using an undeveloped bluff to the east. Both of these crossing locations would converge at the same general location as they continue east of Sun Valley. Refer to Overview Map and Detail 6 map attached.

In addition to the Sun Valley crossing locations, four interchange options exist. The first two alternatives would be a typical tight diamond interchange connecting directly to Sun Valley Boulevard at one of the two crossing locations described above. The interchange would consist of a bridge approximately 30 feet above the existing Sun Valley Boulevard with ramps to/from the east and west directions, and ramp terminal intersections located about 500 feet apart. Refer to the enclosed Overview Map and Detail 6 map.

The second two alternatives consist of a modified partial cloverleaf service interchange west of Sun Valley proper to reduce potential property displacements. The West of Sun Valley interchange could be located coincident with either the southern or northern crossing of Sun Valley described above. Due to differences in grades, the interchange would consist of loop ramps to/from the west and diamond ramps to/from the east. This would result in a ramp terminal intersection spacing of approximately 1,300 feet. The interchange's location west of existing roadway facilities would require construction of a new two-lane arterial connection to

³ Capacity - A transportation facility's ability to accommodate a moving stream of people or vehicles in a given time period.
⁴ Diamond-type interchange - is a common type of road junction, used where a freeway crosses a minor road. The freeway itself is grade-separated from the minor road, one crossing the other over a bridge. Approaching the interchange from either direction, an off-ramp diverges only slightly from the freeway and runs directly across the minor road, becoming an on-ramp that returns to the freeway in similar fashion.
⁵ High-speed interchange - a interchange designed for speeds over 50 miles per hour.
⁶ Cuts and fills - In earthmoving, cut and fill is the process of constructing a road whereby the amount of material from cuts roughly matches the amount of fill needed to make nearby embankments, so minimizing the amount of construction labor.
⁷ Ramp terminal - where highway ramps end in an intersection.
⁸ Cloverleaf - A cloverleaf interchange is a two-level interchange in which left turns (in countries that drive on the right) are handled by loop roads (U.S.: ramps, UK: slip roads). To go left (in right-hand traffic), vehicles first continue as one road passes over or under the other, then exit right onto a one-way three-fourths loop ramp (270°) and merge onto the intersecting road.
Dandini Boulevard and a four-lane arterial connection to West 1st Avenue. The West of Sun Valley interchange could tie into the planned West Sun Valley Arterial, a regionally significant facility identified in the Washoe RTC Regional Transportation Plan. Located on the side of Red Hill, the West of Sun Valley interchange would be located above- and below-grade, requiring cuts and fills. Refer to the enclosed Overview Map and Detail 6 map.

**Pyramid Corridor Alignments**

East of the Sun Valley Area and north toward Sparks Boulevard, the six-lane US 395 Connector freeway would consist of one of three alignment alternatives: On-Alignment, Off-Alignment, and Ridge Alignment alternatives, as described below:

- The On-Alignment Alternative would continue east over the hills to the existing Pyramid Highway, dividing Sun Valley and Sparks. The existing Pyramid facility would be converted from a four-lane arterial to a six-lane freeway from just north of Disc Drive to Sparks Boulevard. Modified split diamond interchanges are proposed at Disc Drive and Golden View Drive, where the freeway would cross approximately 25 feet to 30 feet above the existing grade and consist of ramp terminal intersections located approximately 350 feet apart. The area between these interchanges would be connected by frontage roads. The frontage roads would parallel the freeway facility, generally be at-grade (retaining wall-separated), and create a project footprint approximately 350 feet to 500 feet wide through this section. The mainline freeway would vary in height throughout this section, from a maximum of 30 feet at interchange crossings, to a minimum of 5 feet between interchanges. Refer to the enclosed Overview Map and Detail maps 3 through 5.

- The Off-Alignment Alternative would avoid many of the property impacts associated with improving the existing developed corridor. This would be accomplished by turning the six-lane freeway facility northward as it approaches the Pyramid corridor from the west. The alignment generally would be just below the eastern ridgeline of the mountains but west of most of the Pyramid corridor development. This would require sizeable cuts and fills as the alignment hugs the ridgeline, which would create visual impacts. An interchange with a westward extension of Disc Drive would be located approximately 0.5 miles west of the commercial core, and an interchange with existing Pyramid Highway would be located approximately 1,500 feet south of Sparks Boulevard. Refer to the enclosed Overview Map and Detail 4 and Detail 5 maps.

- The Ridge Alignment Alternative is similar to the Off-Alignment Alternative, except that it would be located farther to the west behind the eastern ridgeline. The Ridge

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9 *Frontage Roads* - A frontage road (also access road, service road, and many other names) is a non-limited access road running parallel to a higher-speed road, usually a freeway, and feeding it at appropriate points of access (interchanges). In many cases, the frontage road is a former alignment of a road already in existence when the limited-access road was built.

10 *At-grade* - An at-grade intersection is a junction at which two or more transportation axes cross at the same level (or grade).
Alignment Alternative would create fewer visual impacts than the Off-Alignment Alternative, but would be located farther from commercial and residential development. Similar to the Off-Alignment Alternative, the Ridge Alignment Alternative would include an interchange with the Disc Drive extension over 0.5 miles west of the commercial core and with the existing Pyramid Highway approximately 1,500 feet south of Sparks Boulevard. Refer to the enclosed Overview Map and Detail 4 and Detail 5 maps.

The three Pyramid corridor alignment alternatives described above would require additional improvements in this segment of the project area. Disc Drive would be widened from four lanes to six lanes at-grade from Pyramid Highway to Vista Boulevard. In addition, a new six-lane extension of Disc Drive would connect the Pyramid Highway / Disc Drive intersection with a new US 395 Connector / Disc Drive interchange. The exact location and layout of this interchange varies with each Pyramid corridor alignment alternative. The Disc Drive extension would generally be located below the existing grade, varying between 50 feet to 175 feet below grade. In addition, Pyramid Highway would be widened from four lanes to six lanes at-grade between Queen Way and Los Altos.

**Pyramid Northerly Interchanges and Terminus**

One build alternative is being considered from Sparks Boulevard to the north end of the project. It would consist of a six-lane elevated freeway from Sparks Boulevard to just north of the Eagle Canyon / La Posada intersection, and a six-lane arterial at-grade to Calle de la Plata. The freeway would be elevated, and would vary between five feet to ten feet in height between interchanges. Interchanges would consist of the freeway crossing over the local roadway at a height of approximately 25 feet to 30 feet. Refer to Overview Map and Detail maps 1-3 attached.

Interchanges would consist of a split diamond interchange from Sparks Boulevard to Lazy 5 Parkway, connected by frontage roads. The frontage roads would create a 350- to 500-foot-wide overall footprint. The frontage roads would be constructed at-grade and would be separated from the mainline freeway by retaining walls. A split diamond configuration is proposed between the Dolores Drive and Eagle Canyon / La Posada interchanges. The frontage roads would create a 350- to 500-foot-wide overall freeway footprint. The frontage roads would be at-grade and separated from the mainline freeway by retaining walls.

**Other Project Components**

In addition to the roadway improvements described above, other transportation improvements are proposed. These include bicycle/pedestrian facilities, ranging from bicycle lanes and sidewalks to multi-use paths along portions of the alignment. Bicycle facilities would generally be located at the same grade as adjoining roadway improvements. Park-and-Ride lots of approximately one acre are proposed in the southeast quadrant of the Pyramid Highway / Calle de la Plata intersection, the southeast quadrant of the Pyramid Freeway / Eagle Canyon / La Posada interchange, and as a shared lot with the existing Wal-Mart parking lot. Increased transit service and Intelligent Transportation System (ITS) improvements are included, which would have a negligible effect on the project footprint and viewshed.

**Areas of Potential Effect (APE)**
The Archaeological Area of Potential Effect (APE) will be submitted later in the process once more design information is available.

The Historic Architectural Resource APE for direct and indirect impacts includes the project footprint, adjacent parcels, and parcels that might be visually impacted by the project. The direct impacts will be parcels that will experience takes due to construction of the new highway.

The indirect impacts would include visual effects to properties from construction of the transportation facilities. Visual impacts generally exceed in range the auditory impact (traffic noise analyses focus on parcels adjacent to, or one parcel from, the right-of-way). The project is not expected to induce development that would expand the APE beyond those areas stated above. In terms of induced development, this project includes two types of roadway improvements: improvements to existing roads, or construction of new roads. New road construction for this project generally would occur on steeper slopes in BLM-owned property and/or zoned open space. These areas are not likely to be developed in the reasonably foreseeable future due development restrictions and the costs associated with, developing lands on steep slopes, especially when there are currently a large number of vacant commercial buildings available.

New development, as a result of improvements to existing roads, is not expected to exceed the visual APE range because: 1) there is existing available commercial space on Pyramid Highway, 2) the likelihood that development would be commercial along the existing road, 3) development would be as far from the proposed alignment as current development, and 4) the cost of leveling any new parcel in the APE.

The APE includes 702 parcels in the APE and 631 acres (see enclosed maps). The cutoff date for structures warranting further evaluation for eligibility for listing on the National Register of Historic Places (NRHP) is 1971. This 40-year cut-off date may give the Environmental Impact Statement (EIS) a longer “shelf-life.”

Methodology
NDOT reviewed Washoe County Assessors Department data regarding structure age and identified 11 parcels to be included in the visual/historic architectural APE based on the project alternative alignments. A reconnaissance survey of those parcels was conducted in June 2011 from public rights-of-way and other public spaces. The survey attempted to identify the total number of buildings on a parcel and their relationship to each other, gathered basic descriptive data on their materials and methods of construction to the extent possible, and photographed each building when possible.

Next Steps:

- **Prepare Programmatic Agreement:** A Programmatic Agreement (PA) will be prepared that describes the process by which Section 106 will be accomplished for the project, who is responsible, and when activities will take place. This will allow archaeological site recordation to occur after completion of the Draft EIS but prior to completion of the Final EIS. Further, should design changes warrant additional archaeological investigation, the PA would outline the process for completing Section
106 documentation, subsequent to the Record of Decision (ROD). The PA will be appended to the EIS.

- **Archaeology Inventory:** An Archaeological inventory will be conducted according to Class III standards. Recordation and evaluation of sites will use Appendices D and E from the State Protocol Agreement between the Bureau of Land Management, Nevada, and the Nevada State Historic Preservation Office for Implementing the National Historic Preservation Act, Finalized October 26, 2009.

- **Architectural Inventory:** An architectural inventory of the APE will be completed by Western Cultural Resource Management, Inc. The report will evaluate all pre-1972 buildings in the APE using a Historic Resource Inventory Form.

If you have any questions, please feel free to call me at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosure

cc: C. Cliff Creger, NDOT
ec: Andrew Soderborg, FHWA
Abdelmoez Abdalla, Environmental Program Manager
US Department of Transportation
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Re: Architectural Area of Potential Effect and Project Description for Pyramid Highway/US 395 Connection Project, Washoe County, Nevada
EA: 73391
WA11-009R
SHPO Undertaking Number: 2010-0884

Dear Mr. Abdalla,

The Nevada State Historic Preservation Office (SHPO) has reviewed the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information submitted in correspondence from FHWA dated September 8, 2011 (received September 12th) the project consists of converting Pyramid Highway from an existing arterial to a freeway and constructing a new freeway from Pyramid Highway to US 395.

Area of Potential Effect (APE)
The SHPO concurs with the Architectural APE as defined in the above referenced correspondence and as illustrated in the APE Map Overview.

Project Description
The SHPO has reviewed the expanded project description. Based on the submitted information, including maps and correspondence, the SHPO understands the following. If this understanding is inaccurate, please clarify.

- The Parr/Dandini Interchange, which is labeled on the map, will be replaced with the 395 System Interchange, which is described in the project description.
- Per APE Map Detail 5, Pyramid Highway appears to be labeled as Sun Valley Boulevard.
For future correspondence, please label all alternatives on the maps to ensure that the written correspondence and maps correlate. The SHPO notes that the 3 different Pyramid Corridor Alignments (On, Off, and Ridge) are labeled individually in Map Details 4, 5. However, in the Sun Valley Area, the four different alternatives in Map Detail 6 are not individually identified. Please label Alternatives 1 through 4, should they be referenced in future correspondence.

Resource Identification
Regarding architectural resources, those constructed in 1972 or earlier will be documented utilizing Nevada’s Historic Resource Information Form (HRIF). The APE includes 702 parcels and 631 acres. Had a buffering system, instead of a parcel system, been utilized to document the APE, perhaps fewer acres or properties would have been surveyed.

Regarding archaeological resources, the SHPO notes that the APE and the corresponding inventory will be submitted once the design information is available.

Programmatic Agreement
At this time, the SHPO concurs with the Architectural APE and awaits a draft copy of the Programmatic Agreement (PA).

If you have questions regarding the architectural contents of this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@nevadaculture.org.

Sincerely,

Rebecca L. Palmer
Deputy State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
Ms. Rebecca Palmer  
Deputy Historic Preservation Officer  
State Historic Preservation Office  
901 S. Stewart Street, Suite 5004  
Carson City, Nevada 89701

Subject: Pyramid-US 395 Connector, Reno, Washoe County, Nevada  
EA # 73390 & 73391; FHWA # DE-0191(065) & DE-0191(067)  
SHPO Undertaking #2010-0884

Dear Ms. Palmer:

The Federal Highway Administration (FHWA), the Nevada Department of Transportation (NDOT), and the Regional Transportation Commission of Washoe County (RTC) propose a project to improve traffic flow along the Pyramid Highway from Queen Way to Calle de la Plata Drive. The project will also include a connector route from US 395 to the Pyramid Highway through the Sun Valley neighborhood in the northwestern portion of the Reno metro area. At this time, the FHWA requests that you review the enclosed materials and concur with the FHWA eligibility determinations for architectural resources.

The enclosed Historic Architectural survey report was prepared by Western Cultural Resource Management (WCRM), Inc. The report is titled: Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada. The report evaluated historic architectural resources that are within the project’s Area of Potential Effect (APE). Your office concurred on the project’s APE in a letter dated October 11, 2011.

Identification of Historic Properties
WCRM, Inc. prepared 34 Historic Resource Inventory Forms (HRIFs) and three Historic District Forms for this report. Individual HRIFs completed for properties within a recommended historic district are included in the total count of HRIFs.

Two previously evaluated linear resources were re-evaluated for this report: the Orr Ditch and the Prosser Ditch. The Orr Ditch was previously determined eligible to be listed in the National Register of Historic Places (NRHP). The segments of the Orr Ditch that are in the Pyramid US 395 connector project’s APE were re-evaluated and found to be non-contributing elements. The
re-evaluation is addressed in Appendix C of the survey report. No HRIF was prepared for this previously evaluated resource.

The Prosser Ditch was also previously evaluated and determined to be eligible. The three segments of the Prosser Ditch that are in the Pyramid US 395 connector project’s APE were re-evaluated. The report recommends that segments A and B are non-contributing elements to the Prosser Ditch, while segment C was recommended as a contributing element. An HRIF was prepared for the Prosser Ditch.

Please note that three additional buildings in the APE were old enough to warrant an HRIF; however, no HRIF was prepared because these buildings are being evaluated as part of another FHWA architectural inventory report for the Pyramid-McCarran Intersection project. FHWA will consult with SHPO on the eligibility of the following buildings at a later date:

- Reno Arch Missionary Church/Baik Building located at 620 Queen Way, Sparks; built in 1904 (APN 2801140).
- Sparks Christian Church located at 560 Queen Way, Sparks; built in 1965 (APN 2801139).
- Matthew H. Gibbons House/Van Meter House located at 5745 Wedekind Rd, Sparks; built in 1963 (APN 2801203).

**Determination of Eligibility**
The report recommends three historic districts and two linear resources as eligible for the NRHP. The following table lists the eligible properties and FHWA’s eligibility determination:

<table>
<thead>
<tr>
<th>Name</th>
<th>Consultant’s Eligibility Recommendation</th>
<th>FHWA’s Eligibility Determination</th>
<th>Notes</th>
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<td>Trosi Family/Kiley Ranch Historic District</td>
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<td>Eligible A, B</td>
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<td>Old Pyramid Highway</td>
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<td>Segment A is 0.27 miles long and Segment B is 0.15 miles long.</td>
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The FHWA reached a different conclusion on the eligibility of the Old Pyramid Highway. The FHWA has determined that the Old Pyramid Highway does not retain sufficient integrity to convey its historical associations. A detailed justification of FHWA’s eligibility determination is included on the HRIF coversheet for the Old Pyramid Highway. Attached to this letter is a list of FHWA’s eligibility determinations for all of the properties that were evaluated.

The report recommends that the project will have an adverse effect on some of the NRHP eligible properties and proposes mitigation measures. The FHWA is only requesting SHPO’s concurrence on the findings of eligibility for architectural resources. A request for concurrence on the entire project’s effect will be made after the archaeological survey and Native American consultations are complete.

If you have any questions, please contact Elizabeth Dickey of NDOT at 775-888-7478 or myself at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures: Report, photographs & negatives, archival CD

cc: C. Cliff Creger (NDOT)
Jim Carter (BLM)
Andrew Soderborg (FHWA)
Justification

The contractor recommended two segments of the 1934-1935 Old Pyramid Highway as eligible for the National Register of Historic Places (NRHP) under Criteria A because the road is associated with events important to local history as a main highway in the region leading to Pyramid Lake from Reno, and because these are the only known segments of the road.

The FHWA has determined that Segment A and Segment B of the Old Pyramid Highway are not eligible for the NRHP because the two segments no longer retain sufficient integrity to convey their historical associations.

Integrity

Integrity is not only important to a resource being evaluated under Criteria C, it is also necessary for a resource being evaluated under Criteria A. A resource may have associations with the broad patterns of history; however, if the integrity of the resource is so low that it cannot convey those associations, then it does not meet the requirements for being eligible for listing on the NRHP (NPS 1997:12).

The character defining features of a mid 1930s-era highway in Nevada are:
- Related signage and road markers
- Original alignment
- Culverts constructed of rubble masonry
- Asphalt paved surface
- Original roadway dimensions
- Integrity of setting

These are the essential physical features that must be present for a historic road to represent its significance. The integrity of setting is particularly vital. By their nature, roads are connected to the landscape and the setting. The points they link are as important as the scenery that passes by on the journey. The surrounding human built and natural landscape must retain enough integrity to convey the feeling of the road’s historic-era.

The Old Pyramid Highway has no related signage or road markers. A metal pipe embedded in a rock cairn may be a marker that was associated with the road; however, its original function is not evident from the physical remains. The two segments of road represent the original 1934-1935 alignment of the road. A small culvert with granite masonry remains. Most of the asphalt has deteriorated to the point that it is no longer identifiable as asphalt. The original roadway dimensions of about 23 feet wide are discernible, though many sections have become overgrown and it is difficult to decide where exactly the roadbed ends and the ground begins. The setting of the road has changed from rural, undeveloped land to modern commercial areas with a large highway--the modern Pyramid Highway--traveling over parts of the historic route of the Pyramid Highway. The Old Pyramid Highway does not retain most of the character defining features and the features it does retain have poor integrity. The stone culvert would be the exception. The culvert appears to have good integrity of design, workmanship and materials, though the presence of a culvert alone is not enough to make a road segment eligible for the NRHP.
Federal Highway Administration Eligibility Determination

**Design:** Nevada FHWA recommends that at least one mile of road is necessary to convey the original design of a historic road. The essence of a road is that it travels *through* a landscape. Segments of road shorter than one mile lack the essential quality of a road, especially in areas of relatively level terrain such as the Old Pyramid Highway. Segment A is .27 miles long and Segment B is .15 miles long. Even added together they do not have the length needed to suggest the sense of distance the road once had.

**Materials:** The condition of a historic resource may be poor without affecting the integrity. However, in the case of the Old Pyramid Highway, the condition is so deteriorated that character defining features of the highway, such as asphalt, are missing.

**Location:** The two segments of road (.42 miles) retain integrity of location.

**Workmanship:** Extreme deterioration of the road has diminished the levels of integrity of workmanship. A small culvert, faced with granite ashlar is the only remaining element of the road that displays historic workmanship. The rest of the road has poor integrity of workmanship.

**Setting:** The Historic Resource Inventory Form documents that the road segments have had “significant loss of their original setting and feeling due to nearby modern development.” Commercial development and the nearby modern Pyramid Highway have significantly changed the historically rural setting of the road.

**Feeling:** The changes to the setting, coupled with the poor integrity of the resource leave the road with no expression of aesthetic or historic sense of a particular time period.

The National Park Service advises that good integrity is essential for a property to convey its historical significance and association. While the Old Pyramid Highway may be locally significant for its historic role in connecting the Spanish Springs area to the Reno-Sparks area, these two segments of the Old Pyramid Highway are unable to convey this association because of severe deterioration and urban development of the setting.

National Park Service
1997 *National Register Bulletin: How to Apply the National Register Criteria for Evaluation.*
U.S. Department of the Interior.
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<td>89436</td>
<td>14.8</td>
<td>1965</td>
<td>Not Eligible</td>
<td>Not Eligible</td>
<td>Trail Park HRIF prepared</td>
</tr>
<tr>
<td>15</td>
<td>Mary McGuire House/ Richard N. &amp; Carol S. Paris House</td>
<td>4870</td>
<td></td>
<td>Skaggs Cr</td>
<td>Sun Valley</td>
<td>89433</td>
<td>&gt;1</td>
<td>1963</td>
<td>Not Eligible</td>
<td>Not Eligible</td>
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<td>16</td>
<td>Old Pyramid Hwy</td>
<td>NA</td>
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<td>Sparks</td>
<td>89436</td>
<td>1</td>
<td>1934-1935</td>
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<td>17</td>
<td>Pyramid &amp; Bank Produce Shed/ Naniloa Invenment Co. Produce Shed</td>
<td>7900</td>
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<td>Pyramid Way</td>
<td>Sparks</td>
<td>89436</td>
<td>&gt;1</td>
<td>1925</td>
<td>Not Eligible</td>
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<td>HRIF prepared</td>
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<td>18</td>
<td>Sierra Vista Ranch Historic District</td>
<td>NA</td>
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<td>Pyramid Way</td>
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<td>89436</td>
<td>8.6</td>
<td>1915-1954</td>
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<td>Eligible A, C</td>
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<td>19</td>
<td>Sierra Vista Ranch House</td>
<td>NA</td>
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<td>Sparks</td>
<td>89436</td>
<td>&gt;1</td>
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<td>APN</td>
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<td>20</td>
<td>Sierra Vista Ranch Garage 1</td>
<td>NA</td>
<td>Pyramid Way</td>
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<td>Sparks</td>
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<td>23</td>
<td>Sierra Vista Ranch Livestock Barn</td>
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<td>Pyramid Way</td>
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<td>89436</td>
<td>&gt;1</td>
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<td>Not individually eligible. Contributing element to Sierra Vista Ranch Historic District.</td>
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<td>Sierra Vista Ranch Butler Bin</td>
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<td>89436</td>
<td>&gt;1</td>
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<td>27</td>
<td>Anthony Avellano House/Phillip &amp; Anita Tate House</td>
<td>5045</td>
<td>Sunflower Dr</td>
<td>Sun Valley</td>
<td>89433</td>
<td>&gt;1</td>
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<td>28</td>
<td>Trosi Family/Kiley Ranch Historic District</td>
<td>7000</td>
<td>Sparks Blvd</td>
<td>Sparks</td>
<td>89436</td>
<td>6.6</td>
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<td>Eligible A, C</td>
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<td>29</td>
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<td>7000</td>
<td>Sparks Blvd</td>
<td>Sparks</td>
<td>89436</td>
<td>&gt;1</td>
<td>1920</td>
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<td>HRIF prepared</td>
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<td>30</td>
<td>Trosi Family Ranch &quot;L&quot; Barn</td>
<td>7000 Sparks Blvd</td>
<td>Sparks</td>
<td>89436</td>
<td>&gt;1</td>
<td>1930</td>
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<td>Sparks</td>
<td>89436</td>
<td>&gt;1</td>
<td>1940</td>
<td>Not individually eligible. Contributing element to Trosi Family Ranch Historic District.</td>
<td>Not individually eligible. Contributing element to Trosi Family Ranch Historic District.</td>
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<td>32</td>
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<td>Sparks</td>
<td>89436</td>
<td>&gt;1</td>
<td>1940</td>
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<td>Not individually eligible. Contributing element to Trosi Family Ranch Historic District.</td>
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<td>33</td>
<td>Vickie Tonner House/ Ronald C. Tonner House</td>
<td>4710 Dr Leonesio Valley</td>
<td>Sun Valley</td>
<td>89433</td>
<td>&gt;1</td>
<td>1982</td>
<td>Not Eligible</td>
<td>Not Eligible</td>
<td>HRIF prepared</td>
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<td>34</td>
<td>Sandra Vantilborg Home/ W.E. &amp; S.K. Neeld Home</td>
<td>4850 Dr Leonesio Valley</td>
<td>Sun Valley</td>
<td>89433</td>
<td>&gt;1</td>
<td>1971</td>
<td>Not Eligible</td>
<td>Not Eligible</td>
<td>HRIF prepared</td>
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<td>35</td>
<td>Gyford Taylor Home/ Wanda L. Taylor Home</td>
<td>4734 Dr Leonesio Valley</td>
<td>Sun Valley</td>
<td>89433</td>
<td>&gt;1</td>
<td>1971</td>
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<td>36</td>
<td>William Burris House</td>
<td>955 Skaggs Cr Sun Valley</td>
<td>Valley</td>
<td>89433</td>
<td>&gt;1</td>
<td>1966</td>
<td>Not Eligible</td>
<td>Not Eligible</td>
<td>HRIF prepared</td>
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<td>8582031, 3501104, 3501211, 3503201</td>
<td>Prosser Ditch</td>
<td>NA</td>
<td>NA</td>
<td>Sun Valley</td>
<td>89433</td>
<td>1.5</td>
<td>1905</td>
<td>Eligible A, B</td>
<td>Eligible A, B</td>
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<td>multiple</td>
<td>Orr Ditch (26Wa5352)</td>
<td>NA</td>
<td>NA</td>
<td>Spanish Springs Valley</td>
<td>89433</td>
<td>1872</td>
<td></td>
<td>Previously evaluated and determined eligible. The segments in the APE are non-contributing elements.</td>
<td></td>
<td>No HRIF prepared for this report. Segments in APE are evaluated in Appendix C.</td>
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<td>2801140</td>
<td>Reno Arch Missionary Church/Baik Building</td>
<td>620</td>
<td>Queen Way</td>
<td>Sparks</td>
<td>89431</td>
<td>&gt;1</td>
<td>1904</td>
<td>Previously surveyed. Currently in agency review for a different FHWA project.</td>
<td>In agency review.</td>
<td>No HRIF prepared for this report. FHWA is not requesting SHPO concurrence on eligibility for this property.</td>
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<td>560</td>
<td>Queen Way</td>
<td>Sparks</td>
<td>89431</td>
<td>1</td>
<td>1965</td>
<td>Previously surveyed. Currently in agency review for a different FHWA project.</td>
<td>In agency review.</td>
<td>No HRIF prepared for this report. FHWA is not requesting SHPO concurrence on eligibility for this property.</td>
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<td>Dir</td>
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<td>Consultant's Eligibility Recommendation</td>
<td>FHWA's Eligibility Determination</td>
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<td>41</td>
<td>Matthew H. Gibbons</td>
<td>2801203</td>
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<td>Wedekind Rd</td>
<td>Sparks</td>
<td>89731</td>
<td>&gt;1</td>
<td>1963</td>
<td>In agency review.</td>
<td>Previously surveyed. Currently in agency review for a different FHWA project.</td>
<td>No HRIF prepared for this report. FHWA is not requesting SHPO concurrence on eligibility for this property.</td>
</tr>
</tbody>
</table>
March 28, 2012

Abdelmoez Abdalla, Environmental Program Manager
US Department of Transportation
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Re: Determinations of Eligibility for Pyramid Highway-US 395 Connection Project
Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks Washoe County, Nevada
EA: 73390 & 73391
FHWA: DE-0191(065) & DE-0191(067)
SHPO Undertaking Number: 2010-0884
SHPO Report Number: 8041

Dear Mr. Abdalla,

The Nevada State Historic Preservation Office (SHPO) continues its review of the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information submitted in correspondence from FHWA dated February 26, 2012 (received March 28th) the project consists of converting Pyramid Highway from an existing arterial to a freeway and constructing a new freeway from Pyramid Highway to US 395. At this time, the SHPO has been asked to provide comments regarding eligibility only.

Resource Identification
Regarding archaeological resources, the SHPO notes that the APE and the corresponding inventory will be submitted once the design information is available.

Regarding architectural resources, those constructed in 1972 or earlier were documented utilizing Nevada’s Historic Resource Information Form (HRIF). The APE includes 702 parcels and 631 acres. Had the APE been constructed by anticipated direct and indirect effects rather than by the parcel the APE would have been adequate for the scale and nature of the undertaking (36 CRF 800.15.d).
Abdalla
March 28, 2012
Page 2

Thirty-three resources were documented using Nevada’s Historic Resource Inventory Form (HRIF) and 3 potentially eligible historic districts were identified, including the Sierra Vista Ranch Historic District, the Iratabal Farm Historic District, and the Trosi Family/Kiley Ranch Historic District. (Please see list below.)

At this time, the SHPO is unable to concur with the eligibility recommendations as the historic context submitted with the HRIFs appears to be incomplete and does not support the evaluated resources which is required for documentation standards (36 FR 800.11). Until the supporting context can be completed, the resources remain unevaluated but are considered eligible for Section 106 purposes. The SHPO is available to answer questions and to provide guidance for the completion of the context.

The SHPO recommends two possible alternatives in order for this project to move forward in a timely manner. The context could be completed and resubmitted now or it could be postponed, completed and resubmitted at the treatment stage of the project, along with the amended evaluations, as a form of mitigation. Please inform the SHPO of the desired alternative.

*SHPO resource numbers have been available since August 2011. Since resource numbers were not requested, the SHPO Resource Number column remains blank.
The SHPO notes that other resources within the APE were identified but were not evaluated on an HRIF. These resources include the Orr Ditch, which was previously evaluated and determined to be eligible, along with the Reno Arch Missionary Church, the Sparks Christian Church, and the Gibbons/Van Meter House, all of which your letter states are currently in agency review for a different FHWA project. We await the submission of the appropriate documentation for these resources.

Supporting Documentation
Please note that the submitted maps do not meet the minimum standards for recordation and are not sufficient for digitization. Please submit the necessary 1:24,000 scale map to ensure that the proposed project is legally defensible.

Programmatic Agreement
The SHPO awaits a draft copy of the Programmatic Agreement (PA).

Concurrence
At this time, the SHPO is unable to concur with FHWA’s eligibility recommendations for the evaluated resources as the architectural historic context does not fully support the identified historic properties stipulated by the Secretary of the Interior’s Standards and Guidelines for Identification and as required per 36 FR 800.11. In order for the review of this project to forward in an expeditious manner, the SHPO suggests that this issue should be addressed in the PA.
If you have questions regarding the architectural contents of this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@nevadaculture.org.

Sincerely,

Rebecca L. Palmer
Deputy State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
Ms. Rebecca Palmer
Deputy State Historic Preservation Officer
Nevada State Historic Preservation Office
901 S. Stewart Street, Suite 5004
Carson City, Nevada 89701-4283

Subject: Pyramid-395 Interconnector, Reno, Washoe County, Nevada
FHWA #: DE-0191(065) & DE-0191(067); NDOT EA #: 73390;
Cultural Resource Section #: WA11-009; SHPO Undertaking #: 2010-1884

Dear Ms. Palmer:

The Federal Highway Administration (FHWA), the Nevada Department of Transportation (NDOT), and the Regional Transportation Commission of Washoe County (RTC) propose a project to improve traffic flow along the Pyramid Highway from Queen Way north to Calle de la Plata Drive and to complete a connector route from US 395 to the Pyramid Highway through Sun Valley in the northwestern portion of the Reno metro area. FHWA requests that you review the additional information provided and concur with the FHWA's determinations of eligibility for architectural resources within the project's area of potential effect (APE).

On February 28, 2012, FHWA submitted an architectural survey report to the State Historic Preservation Office (SHPO) for concurrence. The report was titled, Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada and prepared by Western Cultural Resource Management, Inc (WCRM). The SHPO commented on the report in a letter dated March 28, 2012. The SHPO concurred on the proposed APE for the project but was unable to concur with the FHWA's determinations of eligibility because the historic context in the report did not fully support the identified historic properties.

The letter also noted that:
- The report contained no SHPO Resource ID numbers
- The report did not include the required 1:24,000 scale topographic maps of the project area.
- The Orr Ditch was not evaluated on an Historic Resource Inventory Form (HRIF)
The Reno Arch Missionary Church, the Sparks Christian Church and the Gibbons/Van Meter House were unevaluated because they were currently in agency review as part of the Pyramid-McCarran Intersection Project (SHPO Undertaking No. 2010-0873).

On April 16, 2012, Sara Fogelquist, Jessica Axsom, and you attended a meeting with representatives from FHWA, NDOT, Jacobs Engineering, and WCRM to discuss the additional information SHPO requested to complete their review of the project. The meeting did not produce any additional requests for information concerning the architectural survey report, beyond the requests made in SHPO's February 28, 2012 letter.

The following paragraphs address the SHPO's requests:

**Historic Context**
The consultant drafted an outline for the historic context which was e-mailed to Ms. Fogelquist (SHPO) to make sure it covered the themes that SHPO was looking for. Ms. Fogelquist responded to Elizabeth Dickey (NDOT) in an e-mail dated May 1, 2012. Her e-mail stated that the outline of the context looked appropriate. Based on that outline, the consultant has prepared an expanded historic context which is included in the revised architectural history report for the project which accompanies this letter.

**Topographic Maps**
SHPO requested a 1:24,000 scale USGS topographic map. The 1:24,000 scale maps of the project area are Figures 2a and 2b in the architectural history report originally submitted to SHPO. In the event that the maps had become separated from the report, hardcopies of the maps were given to SHPO at the meeting on April 16, 2012. On April 25, 2012, Elizabeth Dickey (NDOT) e-mailed Elyse Jolly (SHPO) a link to a digital copy of the 1:24,000 scale map of the project, along with a GIS shapefile of the surveyed properties.

**SHPO Resource ID Numbers**
Steve Mehls (WCRM) submitted to SHPO the information required for assignment of SHPO Resource ID Numbers (i.e. the first page of the HRIF and a GIS shapefile of property locations). Mr. Mehls received the assigned Resource ID Numbers in an e-mail from Ms. Jolly, dated May 16, 2012.

**Recordation of the Orr Ditch**
The Orr Ditch has been previously recorded on an IMACS form and the SHPO concurred that it was eligible under criteria A, B and C in a letter dated January 29, 1994. Because the Orr Ditch was being included in an architectural resources survey, the SHPO requested that the areas of the ditch within the project's APE be re-documented on an HRIF. The consultant has prepared an HRIF for the Orr Ditch which can be found in the accompanying documentation.

**Unevaluated Properties**
The SHPO noted that the Reno Arch Missionary Church, the Sparks Christian Church and the Gibbons/Van Meter House were unevaluated because they were currently in agency review as part of the Pyramid-McCarran Intersection Project (SHPO Undertaking No. 2010-0873). FHWA has completed review of these properties and determined that they are not eligible for the
National Register of Historic Places under any criteria. FHWA is awaiting SHPO concurrence on the determinations of eligibility.

If you have any questions, please contact me at 687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

ec: Cliff Creger, NDOT
    Andrew Soderborg, FHWA
August 31, 2012

Abdelmoez Abdalla, Environmental Program Manager
US Department of Transportation
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Re: Additional Information for
Determinations of Eligibility for Pyramid Highway-US 395 Connection Project
Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks Washoe County, Nevada
EA: 73390 & 73391
FHWA: DE-0191(065) & DE-0191(067)
SHPO Undertaking Number: 2010-0884
SHPO Report Number: 8041

Dear Mr. Abdalla,

Thank you for the additional information. The Nevada State Historic Preservation Office (SHPO) has reviewed the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information submitted in correspondence from FHWA dated and received August 3, 2012, the project consists of converting Pyramid Highway from an existing arterial to a freeway and constructing a new freeway from Pyramid Highway to US 395. At this time, the SHPO has been asked to provide comments regarding eligibility only.

The additional information for this project includes a revised historic context and additional documentation in the form of a Historic Resource Inventory Form (HRIF) for the Orr Ditch. This information addresses SHPO's letter dated March 26, 2012. Thank you.

The revised historic context supports resources evaluated under National Register Criterion A, B, and C. Criteria D was not addressed. This survey did not include archaeological survey, and, thus,
no discussion of Criterion D considerations has been developed. The archaeological resources associated with the proposed undertaking will be described and National Register evaluation recommendations made in a separate report (page 32). Criterion D, while most often applied to archaeological districts and sites, can apply to buildings, structures, and objects (National Register Bulletin 15, page 21).

Electronic correspondence (dated June 14, 2012) from Sara Fogelquist (SHPO) Liz Dickey (NDOT), regarding the revised context, indicates that ‘As long as the context evaluates the resources under all criteria and addresses all of the resources within the APE...then the context would appear to support the eligibility recommendations in the HRIFs.’ At this time, the SHPO recommends that the resources identified within the APE remain unevaluated under Criteria D.

Resource Identification
Regarding *archaeological* resources, the SHPO notes that the APE and the corresponding inventory will be submitted once the design information is available.

Regarding *architectural* resources, those constructed in 1972 or earlier were documented utilizing Nevada’s Historic Resource Information Form (HRIF). The APE includes 702 parcels and 631 acres. Had the APE been constructed by buffer rather than by parcel the APE would have been more appropriate given the scale and nature of the undertaking (36 CRF 800.15.d).

Based on the submitted information:

Thirty-three resources were documented using Nevada’s Historic Resource Inventory Form (HRIF) and 3 potentially eligible historic districts were identified, including the Sierra Vista Ranch Historic District, the Iratecabal Farm Historic District, and the Trost Family/Kiley Ranch Historic District. (Please see list below.)

Based on the submitted information, the SHPO concurs with FHWA that the following 8 resources are not individually eligible but are eligible as contributing resources within the Sierra Vista Historic District (SHPO Resource Number: D93):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11946</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11947</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11948</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11949</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>5</td>
<td>B11950</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>6</td>
<td>B11951</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>7</td>
<td>B11952</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>8</td>
<td>B11953</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>
Based on the submitted information, the SHPO concurs with FHWA that the following 4 resources are not individually eligible but are eligible as contributing resources within the Trosi Family/Kiley Ranch Historic District (SHPO Resource Number: D94):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11954</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11955</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11956</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11957</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>

The HRIF completed for the Trosi Family/Kiley Ranch Historic District includes a reference to a previous survey. ‘Finally, another portion of this ranch (Locus 1) has been previously recommended eligible under Criterion D due to its ability to offer significant information pertinent to the research topics detailed in other reports (Peterson and Stoner 2003). This portion of the ranch is outside the current parcel boundary due to subdivision of the ranch and ownership changes during the 2000s.’ the SHPO notes that per the Architectural Inventory, the cited report completed by Peterson and Stoner was not submitted to SHPO for review (page 59). Please forward a copy of this report for SHPO’s records and reference.

Based on the submitted information, the SHPO concurs with FHWA that the following 10 resources are not individually eligible but are eligible as contributing resources within the Iracabal Farm Historic District (SHPO Resource Number: D94):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11958</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11959</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11960</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11961</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>5</td>
<td>B11962</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>6</td>
<td>B11963</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>7</td>
<td>B11964</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>8</td>
<td>B11965</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>9</td>
<td>B11966</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>10</td>
<td>B11967</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>

Based on the submitted information, the SHPO concurs with FHWA that the following 2 properties are eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>S820</td>
<td>Eligible, A &amp; B</td>
</tr>
<tr>
<td>2</td>
<td>S828</td>
<td>Eligible, A, B, C</td>
</tr>
</tbody>
</table>
Based on the submitted information, the SHPO concurs with FHWA that the following 10 properties are not eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11968</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>2</td>
<td>B11969</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>3</td>
<td>B11970</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>4</td>
<td>B11971</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>5</td>
<td>B11972</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>6</td>
<td>B11973</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>7</td>
<td>B11974</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>8</td>
<td>B11975</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>9</td>
<td>B11976</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>10</td>
<td>B11977</td>
<td>Not Eligible</td>
</tr>
</tbody>
</table>

Based on the submitted information, the SHPO cannot concur with FHWA that the following resource is not eligible for listing in the NRHP.

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>S821</td>
<td>Unevaluated</td>
</tr>
</tbody>
</table>

Although the consultant recommended the resource (S 821: The Old Pyramid Highway) as eligible under Criteria A, FHWA recommend the resource as not eligible due to diminished integrity.

The HRIIF indicates that resource retains its original alignment and that 'Although the segments recorded are in overall fair condition, they are the only known recorded segments of the old highway and are therefore recommended eligible under Criterion A (page 7). The SHPO questions if there are other examples of the Old Pyramid Highway that retain better integrity and that are being preserved.

The architectural inventory indicates that as a form of mitigation for S821 would be the completion of a document to 'place the impacted segments within the greater context of the highway and they development of the local transportation system' (page 73). The SHPO questions why this would be completed for mitigation and not completed as part of a context to support an eligibility recommendation for the resource. Another context that might further support an eligibility recommendation for S821 is A Cultural Resource Inventory for the Pyramid Lake Paiute Tribe's Proposed Pelican Pointe Project, Washoe County, Nevada, which was completed in 2011 by Kautz Environmental. A copy is available at the SHPO upon request.

At this time, the SHPO recommends treating S821 as unevaluated.
The SHPO notes that other resources within the APE were identified but were not evaluated on an HRIF. These resources include the Reno Arch Missionary Church (B11979), the Sparks Christian Church (B11978), and the Gibbons/Van Meter House (B11980), all of which are currently in agency review for a different FHWA project.

**Project Effects**

Although this letter is not intended to address project effects, the SHPO notes that there appears to be a discrepancy between FHWA’s correspondence dated September 8, 2011 and the architectural inventory (revised June 2012), which was submitted with FHWA’s correspondence, dated August 3, 2012.

Per FHWA correspondence (dated 9.8.11):

The project is not expected to induce development that would expand the APE beyond those areas stated above. In terms of induced development, this project includes two types of roadway improvements: improvements to existing roads, or construction of new roads. New road construction for this project generally would occur on steeper slopes in BLM-owned property and/or zoned open space. These areas are not likely to be developed in reasonably foreseeable future due to development restrictions and the costs associated with, developing lands on steep slopes, especially when there are currently a large number of vacant commercial buildings available.

New development, as a result of improvements to existing roads, is not expected to exceed the visual APE range because: 1) there is existing available commercial space on Pyramid Highway, 2) the likelihood that development would be commercial along the existing road, 3) development would be as far from the proposed alignment as current development, and 4) the cost of leveling any new parcel in the APE (page 5).

Per the architectural inventory (revised June 2012):

Other indirect effects anticipated from the proposed transportation improvement project are likely to include further degradation of the setting of the resources due to increased access that can reasonably be expected to lead to greater traffic volumes. Also, further land development (residential and commercial) on the lands near and around the historic properties is anticipated because of increased accessibility offered by the highway improvements. These effects could best be mitigated through the photo-documentation of the historic properties accompanied by intensive archival and oral history research of the three historic districts and the Spanish Springs Valley. Similarly, the cumulative effect of the project is likely to be further urban growth and the degradation of the setting of the historic properties (page 72).

Additionally, regarding the Trosi/Kiley Ranch, per the architectural inventory (revised June 2012):

There are other buildings, including a barn, that were visible from the road and appear to be historically associated with the ranch, but are today outside of the parcel (page 63).
And;

The anticipated view shed alterations at the Trosi Family/Kiley Ranch will involve the introduction of a new intersection and transition from grade level to elevated highway west and northeast of the historic district (page 64).

Based on the information noted above, there appears to be additional, visible resources that were not included in the Area of Potential Effect (APE), given the proposed project description. Although the Programmatic Agreement (PA) for this undertaking is still in draft, the SHPO will require a reevaluation of the APE for visual, audible, atmospheric, and cumulative effects in this document.

If you have questions regarding the architectural contents of this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@shpo.nv.gov.

Sincerely,

Karyn de Dupuis
Deputy State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
From: Abdelmoez.Abdalla@dot.gov [mailto:Abdelmoez.Abdalla@dot.gov]
Sent: Thursday, November 29, 2012 3:31 PM
To: SFogelquist@shpo.nv.gov
Cc: rlpalmer@shpo.nv.gov; EDickey@dot.state.nv.us; Clarke, Jim O.; Dmaloy@rtcwashoe.com
Subject: FW: Pyramid-395 Draft E-mail to SHPO

Sara:

Thank you for meeting with Ed Stoner (WCRM), Bryan Gant (Jacobs), Suzan Slaughter (NDOT), and Elizabeth Dickey (NDOT) for the site visit of the Old Pyramid Highway segments on November 17, 2012. Thank you also for your comments today of updating the site visit minutes that Liz has written and updated.

The purpose of the visit was to provide SHPO with first-hand information on the integrity and condition of Segments A and B of the Old Pyramid Hwy (SHPO resource ID # S821) that are within the Area of Potential Effects for the Pyramid-US 395 Connector Project in Sparks, Washoe County (SHPO Undertaking # 2010-0884) and to look at a nearby undocumented segment of the Old Pyramid Hwy which is in Wedekind Park.

The Federal Highway Administration (FHWA) has not changed its determination that Segment A and B of the Old Pyramid Highway are not eligible for the National Register of Historic Places (NRHP) under any criteria because of poor integrity of design, materials, feeling, association, workmanship, and setting.

FHWA requested concurrence on a determination of eligibility for Segments A and B of the Old Pyramid Highway in letters to SHPO dated February 28, 2012 and August 3, 2012. At that time, SHPO was unable to concur on the determination and considered Segments A and B as “unevaluated.” In SHPO’s letter dated August 31, 2012, SHPO asked if there were “other examples of the Old Pyramid Highway that retain better integrity and that are being preserved.” The answer is yes, the segment of the Old Pyramid Highway to the south of Segments A and B retains better integrity of setting, association, and feeling and is protected from development by being within Wedekind Park, which is a dedicated open space owned by the City of Sparks.

With the additional information provided by the site visit, FHWA requests SHPO concurrence on the determination that Segments A and B of the Old Pyramid Hwy are not eligible for listing on the NRHP.

Thank you for your assistance in moving this project forward.

Del

Abdelmoez A. Abdalla
Environmental Program Manager
U.S. Department of Transportation
Federal Highway Administration-Nevada Division
Office Phone: (775) 687-1231
Cell Phone: (775) 291-7598
Fax: (775) 687-3803
abdelmoez.abdalla@dot.gov
From: Sara Fogelquist <SFogelquist@shpo.nv.gov>
Date: December 3, 2012, 4:00:12 PM MST
To: "Abdalla, Del" <abdelmoez.abdalla@dot.gov>
Cc: Rebecca Palmer <rlpalmer@shpo.nv.gov>, "EDickey@dot.state.nv.us" <EDickey@dot.state.nv.us>, "Clarke, Jim O." <Jim.Clarke@jacobs.com>, "Dmaloy@rtcwashoe.com" <Dmaloy@rtcwashoe.com>
Subject: RE: Pyramid-395 Draft E-mail to SHPO

Del,

Thank you for your email. The site visit was beneficial. Given the previously submitted information combined with knowledge gained from the site visit, here is the challenge and here is an approach to move forward.

As background:

The consultant recommended the Old Pyramid Highway (S 821) as eligible under Criterion A. FHWA recommended the resource as not eligible due to diminished integrity. SHPO recommended based on this difference between the recommendation and the agency’s determination, that the resource remain unevaluated based on insufficient justification information provided by both parties.

And, the issues identified in previous correspondence regarding Old Pyramid Highway (S 821) remain unresolved.

From SHPO correspondence dated 8.31.12

“The HRIF indicates that the resource retains its original alignment and that ‘Although the segments recorded are in overall fair condition, they are the only known recorded segments of the old highway and are therefore recommended eligible under Criterion A.’ The SHPO questions if there are other examples of the Old Pyramid Highway that retain better integrity and that are being preserved.”

[Note that for another resource to have better integrity that resource needs to have been recorded.]

“The architectural inventory indicates that a form of mitigation for S 821 would be the completion of a document to ‘place the impacted segments within the greater context of the highway and the development of the local transportation system’ (page 73). The SHPO questions why this would be completed for mitigation and not completed as part of a context to support an eligibility recommendation for the resource.”

From meeting minutes dated the 10.4.12

“Sara felt she did not have enough information on the character defining traits under all of the Secretary’s criteria for the original Pyramid HWY to make an informed decision.” AND

“Rebecca offered that the eligibility could be resolved after the preferred alignment was selected.”
Although the site visit was beneficial, the items above remain unaddressed and therefore prevent our concurrence regarding eligibility.

The National Register Bulletins provides guidance for evaluating the eligibility of a resource:

‘For a property to qualify for the National Register it must meet one of the National Register Criteria for evaluation by: Being associated with an important historic context and retaining historic integrity of those features necessary to convey its significance.’

What is the context for the Pyramid Highway and what features would need to be present for the resource to be eligible? Without a context as a benchmark any discussion about integrity is premature as poor integrity cannot be recognized if good integrity has not been established.

Additionally, without a context it is impossible to evaluate the significance of the segment of the Old Pyramid Highway located outside the APE and within the future Wedikind Regional Park. And, given that that segment has not been recorded, it is impossible to discuss the integrity of that segment let alone to determine if it has better integrity than the segment within the APE.

The NR Bulletins recognize that ‘The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property’s physical features and how they relate to its significance.’

If Federal Highway Administration requires a concurrence on their determination of eligibility for this resource, please submit an adequate context, as we had previously requested, and a complete discussion about integrity so that the eligibility of the Old Pyramid Highway is consistent with the National Register evaluation process.

At this time, the SHPO questions if it is still possible to expedite this process by following Rebecca Palmer’s suggestion of resolving the eligibility issue once the preferred alignment has been selected as discussed in the Oct. 4th meeting.

Sara
Rebecca Palmer  
Interim State Historic Preservation Officer  
State Historic Preservation Office  
901 S. Stewart Street, Suite 5004  
Carson City, Nevada 89701-4285  

Subject: Additional Information for Pyramid-US 395 Connector Project, Washoe County, NV  
EA 73390 & 73391; NDOT # WA11-009; FHWA # DE-0191(065) & DE-019(067);  
SHPO Undertaking # 2010-0884  

Dear Ms. Palmer:  

The Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT), are proposing a project to improve traffic flow along the Pyramid Highway from Queen Way to Calle de la Plata Drive, Washoe County, Nevada. The project includes a connector route from US 395 to the Pyramid Highway (SR 445) through the Sun Valley neighborhood in the northwestern portion of the Reno metro area. Enclosed is the additional information that you requested earlier for the Old Pyramid Highway (SHPO Resource ID #S821). FHWA requests that you review and concur with the FHWA’s determination that S821 is not eligible for the National Register of Historic Places (NRHP).  

Background  
FHWA submitted to SHPO an architectural survey report prepared by Western Cultural Resource Management, Inc (WCRM) titled, Architectural Inventory: Pyramid Highway/US 395 Connection Project, Sparks, Washoe County, Nevada, (Revised June 2012), and additional information to supplement the report. In a letter dated August 31, 2012, SHPO concurred with FHWA’s determinations of eligibility for architectural resources with the exception of S821, the Old Pyramid Highway property. The consultant had recommended that S821 was eligible for the NRHP because it was the only known recorded section of the road. FHWA determined that S821 was not eligible because of poor integrity of design, materials, feeling, association, workmanship, and setting. SHPO was unable to concur that the segments were not eligible and recommended that S821 be treated as unevaluated.  

On October 4, 2012, a meeting was held among FHWA, NDOT, and SHPO to discuss the Pyramid-395 Connector project. At this meeting, a site visit to S821 was proposed. Sara Fogelquist (SHPO architectural historian), Elizabeth Dickey (NDOT architectural historian), Suzan Slaughter (NDOT archaeologist), Ed Stoner (WCRM archaeologist), and Bryan Gant (Project Manager for Jacobs) made a site visit on November 7, 2012. At that time, the two
segments of the Old Pyramid Highway were walked, as well as an adjacent segment of the highway within Wedekind Park. Miss Dickey and Miss Fogelquist discussed what the original road and landscape would have looked like, what the road surface would have been made out of, types of signage and markers that could have been present historically, the width of the original road, and other character defining traits of the road that would need to be present for a historic road to retain integrity and to be eligible.

Subsequent to the site visit, Sara Fogelquist sent an email to me on December 3, 2012 (see Appendix C) indicating that the SHPO has three outstanding issues that need to be resolved before they are able to concur or not concur with FHWA’s determination of eligibility for the Old Pyramid Highway segments:

1. **SHPO would like to know if there are other examples of the Pyramid Highway that retain better integrity and that are being preserved.**

   FHWA did identify a segment of the Old Pyramid Highway that retained better integrity of setting, association and feeling, and was being preserved within Wedekind Park, a dedicated open space owned by the City of Sparks. SHPO staff was taken to see this property as part of the November 7, 2012 site visit. In Miss Fogelquist’s 12/3/2012 email, SHPO notified FHWA that integrity of another segment of the road could not be used for comparison to S821 unless the other segment had been recorded. Though the segment of the Old Pyramid Highway within Wedekind Park was part of a Bureau of Land Management (BLM) land exchange, which underwent Section 106, the consultant and NDOT had been unable at that time to locate any records that showed this segment of the Pyramid Highway had been recorded and evaluated for eligibility to the NRHP.

   Additional research into the BLM records has produced two reports, the first titled *Wedekind Park Parcel: A Cultural Resources Inventory for the City of Sparks, Washoe County, Nevada (BLM CRR-03-008)* prepared by Kautz Environmental Consultants in 2001; and the second titled *Cultural Resource Inventory for the Tanamera Commercial Development (Sparks Mall) in Spanish Springs Valley, Washoe County, Nevada (BLM CRR-03-2179)*, prepared by Kautz Environmental Consultants in 2004. The reports included a site form for WA8292 dated 6/26/2001 and an updated form for WA8292a dated 8/23/2003. WA8292/WA8292a is the segment of the Old Pyramid Highway south of the Pyramid-395 Connector Project’s APE within Wedekind Park. BLM determined that segment of the Old Pyramid Highway to be “Not Eligible.”

   BLM submitted the Wedekind Park Parcel Report to SHPO at an unknown date. SHPO responded in a letter dated September 4, 2001 that the Wedekind Park Parcel Report would be incorporated into the statewide archaeological inventory and gave no objections to BLM’s determination of “Not Eligible” for WA8292 (See Appendix A).

   BLM submitted the Tanamera Commercial Development Report to SHPO with a letter dated August 24, 2006. SHPO responded in a letter dated September 21, 2006 that the report would be incorporated into the statewide archaeological inventory and gave no objections to BLM’s determination of “Not Eligible” for WA8292a (See Appendix B).
The segment in Wedekind Park (WA8292/WA8292a) was considered to have diminished integrity. Page 54 of the Wedekind Park Parcel Report reads, “The integrity of this site has been adversely affected by neglect and opportunistic dumping. Although the route of the road segment is clearly discernible, the paving materials have deteriorated badly, and there are piles of refuse on and around the surface of the road. The setting and the feeling of the site have been greatly diminished. The site is recommended as non-significant and ineligible for nomination to the NRHP” (See Appendix A).

The integrity of design, materials, workmanship, setting, feeling and association for S821 is even more degraded than WA8292/WA8292a. S821 is chopped up by two steep berms and crossed by a modern street. S821 is located on a strip of land between the modern alignment of Pyramid Highway and a large shopping development.

In response to SHPO’s question, yes, there is another segment of the Old Pyramid Highway: WA8292a/WA8292. It has better integrity than S821. It is being protected from development as part of Wedekind Park and was previously documented and evaluated for the NRHP twice; it is not eligible for the NRHP.

2. The architectural inventory indicates that a form of mitigation for the Old Pyramid Highway would be the completion of a document to “place the impacted segments within the greater context of the highway and the development of the local transportation system” (page 73 of architectural survey). The SHPO questioned why this would be completed for mitigation and not completed as part of a context to support an eligibility recommendation for the resources.

The consultant has revised the architectural report and added additional historic context on the Pyramid Highway. The information can be found on page 52 of the enclosed revised report. As a result of reviewing the documentation for WA8292/WA8292a, the consultant has changed their opinion regarding the eligibility of S821. The consultant now recommends that S821 is not eligible for the NRHP. This is reflected in the revised report. NDOT has also prepared additional material on the historic contexts of roads in general and the Pyramid Highway specifically (see Appendix D).

In a telephone conversation between Elizabeth Dickey and Sara Fogelquist on January 2, 2013, Miss Fogelquist expressed that the main deficiency in the historic context was that the historical physical appearance of the road, the setting, and associated features were not described adequately. Please see Appendix E and Appendix F for a description of the historical physical appearance of the road, the setting, and the associated features based on historic maps, photographs, Highway Department biennial reports, and road construction plan sets.

3. SHPO felt they did not have enough information on the character defining traits to make an informed decision on the resource’s eligibility.
FHWA provided information on the character defining traits of a typical 1930s-era highway in Nevada in the justification cover page included with the Historic Resource Inventory Form. In a telephone conversation between Miss Dickey and Miss Fogelquist on January 2, 2013, Miss Fogelquist stated that the character defining features of a 1930s highway were too broad and SHPO needed to know the specific characteristics of the Old Pyramid Highway. The features original to the Old Pyramid Highway were discussed during the site visit on November 7, 2012. Please see Appendix E and Appendix F for a description of the historical physical appearance of the road, the setting, and the associated features based on historic maps, Highway Department biennial reports, photographs and road construction plan sets.

SHPO generously offered to move the Section 106 process forward by resolving the Old Pyramid Highway eligibility issue once the preferred alignment has been selected. Unfortunately, this is not an option. SHPO’s opinion on the eligibility status of the resource will be an important factor in deciding which of the alignments is chosen as the final design. FHWA would like to receive SHPO’s eligibility recommendation before making that decision, rather than choosing an alignment without knowing SHPO’s opinion and having the possibility of impacting a 4(f) property.

This letter provides SHPO with information on the three unresolved issues regarding the eligibility of S821, identified in SHPO’s last e-mail correspondence dated 12/3/2012. Based on a review of the historic context and the characteristics of the 1935 Pyramid Highway from the period of significance, FHWA has not changed its determination that S821 is ineligible for the NRHP under any criteria. FHWA requests SHPO concurrence on the determination of “Not Eligible” for S821.

If you have any questions please feel free to call me at 775-684-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures

ec: C. Cliff Creger, NDOT
Elizabeth Dickey, NDOT
Juan Balbuena, FHWA
September 4, 2001

Mr. Richard Conrad  
Assistant Manager  
Non-Renewable Resources  
Bureau of Land Management  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City NV 89701

RE: Bureau of Land Management Inventory Report Acknowledgment.

Dear:

The Nevada State Historic Preservation Office (SHPO) acknowledges receipt of the following inventory report(s):

- Veta Grande Mine Site Cleanup, Carson Valley, Douglas County (Bureau of Land Management Report Number (CR-3-2062)).
- Wedekind Park Parcel, City of Sparks, Spanish Springs Valley, Washoe County (Bureau of Land Management Report Number (CR-3-2008)).

The above mentioned inventory report(s) will be incorporated into the statewide archaeological inventory. Thank you for your submission.

If you have any questions concerning this correspondence, please contact me by phone at (775) 684-3443 or by E-mail at rlpalmer@clan.lib.nv.us.

Sincerely,

Rebecca Lynn Palmer  
Historic Preservation Specialist
RE: CRR3-2008P, *Wedekind Park Parcel...*, draft report dated October 2000. The report is satisfactory however the following comments should be addressed:

Table 5.1, #9 Bidding misspelled (S/B Bitting)

page 40 **General Observations** - The last paragraph mentions the abandoned segment of Pyramid Highway SR 447 that runs through the project area. Enclosed are copies of 1927 and 1937 Nevada Highway maps that show a route (Nevada 32, 33) in this general location (on file at Nevada Historical Society). Renee Kolvet attempted to contact Jim Eppley (NDOT, Roadside History) to verify the historic road location, when it was first paved, and when it was abandoned. Mr. Eppley was on vacation however a co-worker stated that this segment was paved in April of 1935. Helen Salazar (NDOT) is checking on the date of abandonment. Based on its age, the road segment should be recorded.

page 40 Same paragraph - CrNV-03-5388- Was enough of the license plate intact to tell whether it was a Nevada plate?

Page 41 2nd paragraph, re: pet cemetery. Since the project is located in the Wedekind Mining District, the presence of 20 or more pet burials is interesting. Perhaps they are there due to the area’s proximity to Sparks however several rock cairns are also present. Were any of the pet burials probed? Were the rock clusters concentrated in one area or are they scattered throughout the 287-acre parcel? Please contact Renee Kolvet at the BLM (885-6196) to clarify this matter.

page 46 The Monite Explosives Factory (CrNV-31-4936) deserves a bit more discussion since the reader may not have access to Mecham 1996. Were the explosives manufactured mainly for mining purposes related to Wedekind Mining District? How many building were once at this location? SHPO may require a structure form for Building 20 in case one was not already prepared.
slopes. Portions of the road have remnant paving. The patches of pavement are in poor condition, but traces of a double yellow line and a single white dashed line are still visible. Telephone conversations with staff members of the Roadside History group at the Nevada Department of Transportation indicate that the highway was first paved in 1935, and that this segment was abandoned in 1969. This segment was isolated and abandoned because the highway was re-routed through a deep artificial cut in the ridge which extends west from the hill.

Table 5.3 Newly Recorded Archaeological Sites

<table>
<thead>
<tr>
<th>Number: CNV-05</th>
<th>Site Description</th>
<th>Dimensions (in-meters)</th>
<th>UTM Coordinates</th>
</tr>
</thead>
<tbody>
<tr>
<td>5385</td>
<td>Cluster of 4 mineral prospects, apparently excavated with hand tools, a cairn, and 2 fruit/vegetable cans.</td>
<td>36 X 27</td>
<td>264421 4384196</td>
</tr>
<tr>
<td>5386</td>
<td>Cluster of 7 mineral prospects, apparently excavated with hand tools, 3 cairns, and a secondary trash deposit.</td>
<td>53 X 27</td>
<td>264422 4384106</td>
</tr>
<tr>
<td>5387</td>
<td>Prospect pit, apparently excavated with hand tools, fragments of 1 or more amethyst glass bottle(s), and a rhyolite core.</td>
<td>16 X 13</td>
<td>264658 4383690</td>
</tr>
<tr>
<td>5388</td>
<td>Cluster of 4 mineral prospects, apparently excavated with hand tools, and sparse trash scatter.</td>
<td>77 X 45</td>
<td>264755 4383615</td>
</tr>
<tr>
<td>5389</td>
<td>Cluster of 4 mineral prospects, apparently blasted and cleared with hand tools. No artifacts.</td>
<td>37 X 16</td>
<td>264706 4383371</td>
</tr>
<tr>
<td>5390</td>
<td>Very small lithic scatter: chert projectile point mid-section fragment, probably corner notched, 2 basalt projectile point tip fragments, a late stage basalt biface fragment, and 4 debitage flakes (3 chert, 1 obsidian).</td>
<td>4.6 X 2.6</td>
<td>264736 4383410</td>
</tr>
<tr>
<td>5391</td>
<td>Prospect pit, apparently excavated with hand tools, fragments of an amethyst glass bottle, and a cut nail.</td>
<td>9 X 9</td>
<td>264980 4383344</td>
</tr>
<tr>
<td>5392</td>
<td>Aboriginal hunting blind, 4 pieces of obsidian debitage.</td>
<td>9.6 X 3.5</td>
<td>264761 4383151</td>
</tr>
<tr>
<td>5393</td>
<td>Structural remnants of a house and an out building.</td>
<td>48 X 30</td>
<td>264267 4383993</td>
</tr>
<tr>
<td>5508</td>
<td>Abandoned segment of State Route 445.</td>
<td>1200 X 4</td>
<td>264180 4383520 264395 4384335</td>
</tr>
</tbody>
</table>

Note: Zone 11, 1927 North American Datum
CrNV-03-5393: Remnants of possible historic dwelling (house). The limited material remains and lack of subsurface cultural deposits suggest there is little potential to recover additional substantive data for clarifying historic activities in this vicinity, as identified in the historic research domains for the project area. The features and artifacts are not unique or representative of a period or method of construction, and the site presently has no known associations with events or persons of prominence. Thus, the site is recommended as not eligible for the NRHP under any criteria. Based on this assessment, no additional measures are necessary to protect or mitigate the potential effects of project development at this site.

CrNV-03-5508: An abandoned segment of the Pyramid Lake Highway, State Route 445 (formerly State Route 33). This road segment is not associated with persons or events significant in history. It does not represent a distinctive type, period, or method of construction. Further investigation of the road segment is unlikely to yield any information important in local or regional history. The integrity of this site has been adversely affected by neglect and opportunistic dumping. Although the route of the road segment is clearly discernible, the paving materials have deteriorated badly, and there are piles of refuse on and around the surface of the road. The setting and the feeling of the site have been greatly diminished. This site is recommended as non-significant and ineligible for nomination to the NRHP. No additional management measures are recommended to protect or mitigate the potential effects of project development at this site.
Cultural Resources Inventory for the
Tanamera Commercial Development (Sparks Mall)
in Spanish Springs Valley, Washoe County, Nevada

Report

all pub. local -
already submitted to
STIPD prior to
Bur. involvement w/
right of way

Bur. did not comment
on this report -
not a federal undertak

KAUTZ ENVIRONMENTAL CONSULTANTS, INC.
State Historic Preservation Officer
Nevada State Historic Preservation Office
Department of Museums, Library and Arts
100 North Stewart Street
Carson City, Nevada 89701-4285

Attention: Rebecca Palmer

Re: Positive Reports

Dear Mr. James:

Under the State Protocol Agreement Between the Bureau of Land Management, Nevada and the Nevada State Historic Preservation Office, the following guidelines were used for the listed undertakings:

Pg. 6, Part VI. Case-By-Case Review, subpart A. Routine Undertakings, whereby the BLM determines the Area of Potential Effect (APE), level of information gathering, public involvement, National Register status, intensity of effect, and treatment needs for resources potentially effected without SHPO concurrence prior to authorizing the undertaking;

Pg. 7, Part VII. Identification, Evaluation, and Treatment of Historic Properties., subpart B. Identification, number 5. No Historic Property Situations: As a result of an appropriate inventory, the BLM determines that there are no historic properties within the APE. Upon review and acceptance of the inventory report, BLM will submit the report to SHPO, notified interested persons and proceed with the undertaking;

Pg. 9, subpart C. Evaluation for National Register Eligibility, number 3. Properties Eligible under Criterion D only: a certified BLM cultural resource specialist can determine eligibility under National Register Criterion D [36 CFR Part 60.4(d)] without specific SHPO consultation;
Pg. 9, subpart C. Evaluation for National Register Eligibility, number 4. Properties with Associative or Design Value: This provision applies to properties significant under Criterion A, B and/or C [36 CFR Part 60.4]. BLM’s evaluation of National Register eligibility is dependent upon access to appropriate expertise; and

Pg. 12, subpart D. Assessment of Effects, number 1. No Effect Situations: The BLM can determine that the undertaking will have no effect on historic properties and proceed without further SHPO consultation when there are no historic properties within the APE, or when identified properties will be avoided.

In accordance with the guidelines stated above, this office is submitting the following three reports for incorporation into the statewide inventory:

- CRR 3-2284, A Cultural Resources Inventory of the Toll Road Project, South Truckee Meadows, Washoe County, Nevada
- CRR 3-2203, A Cultural Resource Inventory for the Douglas County Parks and Recreation Department, Johnson Lane Park Project Under the BLM’s Recreation and Public Purpose Act, Douglas County, Nevada
- CRR 3-2320, A Cultural Resources Inventory for the Diamond Hot Springs Estates Project, Wabuska, Lyon County, Nevada
- CRR 3-2179, Addendum: Cultural Resources Inventory for the Tanamera Commercial Development (Sparks Mall) in Spanish Springs Valley

Sincerely,

T. J. Knutson
Acting Assistant Manager, Non-renewable Resources
Carson City Field Office

Enclosure(s)
As Stated

mjw: MWASKI 8/23/06
September 21, 2006

Teresa J. Knutson  
Acting Assistant Manager, Non-Renewable Resources  
Carson City Field Office  
Bureau of Land Management  
5665 Morgan Mill Road  
Carson City NV 89701

RE: Bureau of Land Management Inventory Report Acknowledgment.

Dear Ms. Knutson:

The Nevada State Historic Preservation Office (SHPO) acknowledges receipt of the following inventory report(s):

- Three Material Pits in Lyon County (Bureau of Land Management Report Number: 3-2322).
- Material Pit and Access Road at SR208 DO 5.0, Antelope Valley (Bureau of Land Management Report Number: 3-2266).
- Toll Road Project, Washoe County (Bureau of Land Management Report Number: 3-2284).
- Douglas county Parks and Recreation Johnson Lane Park Project, Douglas County (Bureau of Land Management Report Number: 3-2203).
- Diamond Hot Springs Estates Project, Lyon County (Bureau of Land Management Report Number: 3-2320).
- Tanamera Commercial Development addendum, Spanish Springs Valley, Washoe County (Bureau of Land Management Report Number: 3-2179).
The above mentioned inventory report(s) will be incorporated into the statewide archaeological inventory. Thank you for your submission.

If you have any questions concerning this correspondence, please contact me by phone at (775) 684-3443 or by E-mail at rlpalmer@clan.lib.nv.us.

Sincerely,

[Signature]

Rebecca Lynn Palmer
Review and Compliance Officer, Archaeologist
Cultural Resource Report Number: CRR 3-2179

Report Name and Author: *Addendum: Cultural Resources Inventory for the Tanamera Commercial Development (Sparks Mall) in Spanish Springs Valley* /Robert Kautz and Danielle Cozart

<table>
<thead>
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<th>SITES</th>
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<td>----------</td>
</tr>
<tr>
<td>03-5834</td>
</tr>
<tr>
<td>03-5508</td>
</tr>
</tbody>
</table>

Determination of Effect:

- No Effect  
- X No Properties  
- No Adverse Effect  
- Adverse Effect

Mitigation/Stipulations: None

Archaeologist: [Signature]  
Date: [Signature]

Manager: [Signature]  
Date: 5/22/06
FAX

KAUTZ ENVIRONMENTAL CONSULTANTS, INC.
5200 Neil Road, Suite 200
Reno, NV 89502
Phone: (775) 829-4411
Fax: (775) 829-6161

TO: Jo Hufnagel

COMPANY: Carson BLM FAX # 885-6147

FROM: Bob Kautz

TOTAL NUMBER OF PAGES: 3 DATE: 3/2/04

DESCRIPTION OF DOCUMENT:

Jo, I got called by Kraig Knudsen about the Sparks Galleria project. I hope this exchange between myself and SITRO helps. Please give me a call if you have any other questions.

Thank you, Bob

Call (775) 829-4411 if there are any problems with this transmission
February 26, 2004

Mr. Robert Pyzel  
City of Sparks  
Office of Planning and Community Development  
431 Prater Way  
P.O. Box 857  
Sparks, NV 89432-0857

Dear Rob:

This letter is in reference to the letter that was addressed to you dated February 18, 2004, from Ms. Rebecca Palmer, Historic Preservation Specialist at NSHPO. Her letter was in response to my company’s report on cultural resources at the Sparks Galleria development, proposed to be built in Spanish Springs Valley.

If you will recall, she concurred with our report’s recommendation that seven sites are not regionally significant (26Wa7118 through 26Wa7124) but noted the significance of the Orr Ditch (26Wa5352) that runs through the center of the proposed project’s APE. In her note to you she inquired about what provisions had been made to avoid an adverse effect to the ditch segment.

I have just spoken with Ms. Palmer about the project and its effect on the ditch. I explained to her that the development plans to bury a pipe through their property at this location with a resulting loss of the trench due to concerns of safety and liability. She has agreed that following our firm’s submittal to NSHPO of the original photos, fully identified, of the ditch at this location, that task will satisfy the NSHPO’s concerns regarding an effect to the historic property.

I have spoken with the project proponent, Mr. Kraig Knudsen, and he has authorized me to prepare the photos as requested by NSHPO. I have asked Monique Kimball of our staff to complete this small project. If you, or any of your staff, should have any questions regarding this project, please feel free to call me or Ms. Kimball at any time.

Sincerely,

Robert R. Kautz, Ph.D.  
CEO

cc. Ms. Rebecca Palmer, NSHPO  
Mr. Kraig Knudsen, Tanamera Commercial  
Ms. Jo Huffnagel
February 18, 2004

Robert Pyzel
City of Sparks
Office of Planning and Community Development
431 Prater Way
PO Box 837
Sparks NV 89432-0837

RE: Sparks Galleria Archaeological Survey, Spanish Springs Valley, Washoe County.

Dear Mr. Pyzel:

The Nevada State Historic Preservation Office (SHPO) reviewed the proposed project. The SHPO concurs with the consultant's recommendation that the following sites are not regionally significant:

26Wa7118; 26Wa7119; 26Wa7120; 26Wa7121;
26Wa7122; 26Wa7123; 26Wa7124.

The SHPO concurs with the following ditch segment is regionally significant:

26Wa5352 ( Orr Ditch).

What provision has the proposed development made to avoid an adverse effect to this regionally significant segment?

If you have any questions concerning this correspondence, please contact me by phone at (775) 684-3443 or by E-mail at rlpalmer@clan.lib.nv.us.

Sincerely,

[Signature]

Rebecca Lynn Palmer
Historic Preservation Specialist
Attachment C: Transportation Historical Context,
Sub-Category – Automobile Roads, Construction Period – Nevada State Route

Over this large silver state, automobile roads tie together the far-flung points people use. These ribbons of dirt, asphalt, concrete and steel contribute to the historic fabric of their regions and communities. This document will define the transportation historic context for the sub-category “automobile roads for the construction period of State Routes” in this specific instance. This context will use uniform definitions and standard historic road language taken from a national perspective and applied here to the state of Nevada (Ingalls 2009, Keane et al 2004, Marriott 2010, Wallace 2004). This context will also review national and state periods of road construction, general road types and road elements.

Historic road study, conservation and management are a relatively new concept. The design, materials and construction technology is as important to the site’s history as are the structures, buildings and landscape surrounding it. Historic roads have specific needs that require a unique perspective.

It is a natural part of the existence of these linear features that both through use and natural transformations they will degrade. Due to weather, use and wear, historic roads require regular and intensive maintenance to keep them functioning. The surface will erode and degrade. Surface water, groundwater, and the freeze/thaw cycle will undermine the structure. Vegetation will also work to reclaim the road.

However, these resources are rarely preserved for their own intrinsic value, saved and fenced off for people to look at. They are preserved with the goal of continued use. Transportation engineers didn’t consciously design unsafe roads. But safety values change over time. If we are to continue the use of older roads, increasing their safety values will be mandatory for in-place preservation.

The Three Types of Historic Roads: Aesthetic, Engineered and Cultural
Historic roads, like the roads of today, were authorized, funded and constructed for different reasons. Understanding the reason and intent for the road construction will set the tone to determine the best approach for analysis and management, leading towards potential preservation. In general, historic roads can be described by three categories: aesthetic, engineered and cultural.

**Aesthetic**
“Aesthetic routes represent historic roads designed to provide a very specific, and positive, traveler experience. In general these historic roads were designed for scenic enjoyment, leisure, recreation or commemoration. As such, aesthetic routes will have a documented purpose or goal behind their development…” (Marriott 2010: 18).

These are generally not the most direct or fastest routes. The route chosen will focus the traveler’s experience, whether that is a tree-covered mountainside, a lakeshore or a vista. In an urban setting, that focus on detail may be important buildings, civic landscapes, or rows of trees. Historic roads that primarily address the aesthetic road type by their concept and intent may be impacted by alteration to any key component of the road.
Engineered
“Engineered routes represent historic roads designed for the efficient movement of people, goods and services. They are our most common designed roadways. While they may exhibit some aesthetic qualities or features, their design intent will be rooted in efficiency of movement, ease of access, and prudent construction cost” (Marriott 2010: 19).

The word describing this road type is “pragmatic”. Of the “road elements” to be discussed, the alignment of an engineered road may be important in representing new technology or material usage. Historic roads that primarily address the engineered road type by their concept and intent may be impacted by alteration to any key component of the road.

Cultural
“Cultural routes represent historic roads that evolved through necessity or tradition. While it is possible some cultural routes may have a documented goal (‘We need a reliable route to deliver the mail’), they will not have the design and construction legacy or an aesthetic or engineered route” (Marriott 2010: 20).

These are roads that often evolved from trails to dirt roads to automobile routes. Cultural routes can often exhibit the most historic periods or layers. The historic periods that the modern road covers are also important to understanding the record. Historic roads that primarily address the cultural road type are more organic and undocumented in their origins. This makes these roads more difficult to assess for impacts in having to consider the key components and potentially buried historic layers present.

Of course, roads are often a combination of all three road types. In this case, NDOT will choose one of the road types to be the primary type that will lead the assessment.

Community planning can be an element in road construction. In urban environments, the typical American town grid is an example of planning. In Nevada, it’s often seen in modern towns as well as mining towns that were laid out.

The period of significance for historic roads is as important as it is for other historic resources. “A period of significance associated with a particular historic road will share a common history, technology and details...For aesthetic and engineered routes there is most always an initial period of significance associated with the years of design, construction and initial use. Cultural routes are more likely to have multiple periods of significance as changes in transportation or use affected the evolution of the historic road (Marriott 2010: 23).” Questions to establish the dates of significance should focus on the intersection of concept and intent with periods of significant road construction.

National Periods of Road Construction
As we travel towards considering the details of our specific road, the Pyramid Highway, next let’s consider national periods of significance that will help to understand the period of significance. The following periods are pulled from Paul Marriott’s work (2010). While Marriott proposes many periods that are specific for certain areas, this context only included those that cover Nevada. So, there won’t be a period of consideration for British colonial road building.
Colonial Roads, 1560-1776

Though colonial roads are not a common resource in Nevada, the potential does exists for colonial Spanish roads in Nevada. The Leyes de Indias (codified in 1680) set the general organization of the Spanish colonial transportation network. This law covered travel, communication and town planning. It set in motion the Caminos Reals (Royal Roads) for the Spanish colonies. These roads were to link the distant settlements with the New Spain capital of Mexico City. Mexico City was linked to Sante Fe by Friar Rodriguez in 1581. The royal roads would eventually cover about 600 miles, connecting Mexico City to 21 missions, two pueblos and four presidios, ending in the mission of San Francisco de Solano in Sonoma County.

Good Roads Movement, 1890-1926

Starting in the 1890’s, the League of American Wheelmen, an organization of bicyclists, advocated for a network of national hard surface roads that would be suitable for bicycling. Combined with the farmer’s need for access to markets and rural mail delivery, this became the Good Roads Movement. Invention of the pneumatic tire in 1885 started the League of American Wheelmen along this path. The significant input in this movement was from recreation and leisure users who demanded these improvements to explore the countryside and wilderness. In reaction, some states, such as New Jersey, responded by creating “highway departments”.

Congress felt pushed by the call for better roads and appropriated $10,000 to conduct a road inquiry in 1893. This developed into the Secretary of Agriculture to establish an Office of Roads Inquiry. This office responded by publishing technology bulletins on road building and also began preparing state and national road maps. In 1897, the office began constructing “object lesson roads” that started as 660 feet of macadamized roads to show the value of good improved roads. In 1905, Congress gave the office official funding and the name changed to the Office of Public Roads, which changed in 1915 to the Office of Public Roads and Rural Engineering.

In 1916, the first bill to establish the federally aided highway program was signed by Woodrow Wilson. The catch for each state was that a state highway department had to be established to receive federal funding. In Nevada, the Nevada Highway Department was established in 1917, ensuring that the state would receive about $1 million in federal funding. In 1918, the Office of Public Roads and Rural Engineering became the Bureau of Public Roads (BPR) that would remain within the Department of Agriculture until 1939. In 1939, the BPR would shift to the New Deal Federal Works Agency and was renamed the Public Roads Administration (PRA).

Named Transcontinental Highways, 1912-1926

The Good Roads Movement and the period called Named Transcontinental Highways overlap. Transcontinental highways fit into the Goods Road Movement in a larger sense that they were part of the Good Roads Movement and the outcome the promoters and financiers had pushed for. Named Transcontinental Highways are called out here to distinguish roads that specifically fit into this category and not conflate them with other roads that came from the Good Roads Movement.

In April 1912, the National Old Trails Road Association formed to promote all-weather paved roads with no tolls from Washington D.C. and New York to Los Angeles. This is similar to Carl G.
Fisher’s promotion in 1912 for a route from New York to San Francisco. Fisher’s route was named the Lincoln Highway by financial and political backer Henry B. Joy, President of Packard Motor Car Company. After the Lincoln Highway, numerous road associations sprang up.

In 1914, the Association of State Highway Officials (AASHO) was formed. Today this group is known as the American Association of State Highway Transportation Officials, or AASHTO. AASHO was formed to promote legislation for good roads and develop, coordinate, and manage roadways and vehicle use.

**The US Highway System, 1926-1956**

AASHO requested the U.S. Secretary of Transportation to appoint a Joint Board on Interstate Highway. In 1925, this board undertook “immediately the selection and designation of a comprehensive system of through interstate routes, and to devise a comprehensive and uniform scheme for designation of such routes in such manner as to give them a conspicuous place among the highways of the country as roads of interstate and national significance” (Marriott 2010: 42). From this directive, the U.S. highway system was adopted in 1926. Roads were named numerically with east-west routes being even, and north-south routes being odd. Lower numbers would start on the east coast and the higher numbers would be on the west coast. Route numbers that ended in “1” were reserved for long distant north-south routes while “0” was reserved for long distant east-west routes.

**Scenic Roads and Automobile Parkways, 1907-1960**

Another result from the Good Roads Movement was promotion of recreation and leisure routes. The automobile, more so than the bicycle, became a mode of transportation for the growing middle class and the middle class used this vehicle as independent transportation. In part they chose their own itineraries and scenic destinations; they needed all-weather good paved roads to do this. Tourism increased from this all-weather road blossoming; day trips, drives and touring excursions were promoted to the “motoring” class. Beginning in 1893 with the World’s Columbian Exposition’s call to “See America First” campaign, American’s took to the road to see the newly formed “national parks”, recreational spaces and cultural attractions.

**Modern Highway Network, 1940-1970**

After the polish wore off the need for new all-weather paved roads, more efficient roads to get places were necessary as people began to rely on their vehicles. Automobile technology improved, allowing for faster movement. This faster movement forced road engineers to design, safer, higher speed roads. Marriott (2010:46) describes them thusly:

> “Wide concrete ribbons raced across the...landscape as geographic barriers to our forefathers bowed. Rivers were crossed, mountains tunneled and hillside lowered. Even the pesky tollgates of the past were removed to exit ramps so as not to impede the modern traveler on his high speed mission. Significant too was the abandonment of landscape and parkway considerations that so strongly shaped and defined many of our first modern roads.”

The design of the first high speed highway was the Pennsylvania Turnpike. It was designed for 12-foot concrete lanes, a 10-foot median and 10-foot berms at the highway’s edge. The right-of-way for it was 200 feet wide. The road was super-elevated to maintain highway speeds and the minimum required line of sight distance was 600 feet.
From 1956 to 1970 was the promotion of the Interstate System. Signed into law by Dwight D. Eisenhower, the Federal Aid Highway Act established a national system of military and interstate highways.

**State Specific Road Periods**

**Nevada State Routes, 1917-1946**

State specific periods of significance are outside of the National periods of significance. In Nevada, State Routes are a classification of roads outside of roads classified as Interstate or U.S. Routes. As such, State Route construction on a state level would have begun only as early as the start of the Nevada Highway Department in 1917; the Nevada Highway Department being the first state level organization to construct roads. The construction period for state routes will be set in this context as starting at 1917 and ending at the end of World War II in 1946, this mirrors the use of the concrete “N” right-of-way marker. The hypothesis for the State Route period of significance as mirroring the concrete “N” right-of-way marker brackets the period between the start of the Nevada Highway Department and the beginning of the advent of Modern National Highway System.

**Road Elements**

Before assessing the roads for their significance, it is helpful to set the characteristics of roads. Roads can be described in three parts, their length, their materials, and their construction. A “road” is comprised of the travelway, the roadside, and the setting. As with integrity, the characteristics of the road parts in their total may not be applicable. Certain roads may only have certain characteristics. The characteristics as defined by Marriott (2010) will be used to continue the national significance perspective. Redefinition for purposes of applicability to Nevada will proceed at a later date.

**The Road**

The parts of the road itself comprise the physical construction that was used for the movement of people and goods. The road has nine characteristics (Marriott 2010: 11-12):

- **travelway**
  The travelway refers to the area of the road dedicated to the movement of vehicles. This may also be referred to as a “carriage way” or “travel lane”.

- **pavement**
  Pavement is the durable or semi-durable surface of the travelway. Pavement may be dirt, gravel, wood (planks, wood block, or corduroy—logs lain side-by-side), stone (cobblestone or granite Belgian-block), brick, macadam, concrete or asphalt.

- **alignment**
  Alignment refers to the horizontal or vertical movement of the road. More specifically, horizontal alignment refers to a road’s movement to the left or right — its curves — and vertical alignment refers to a road’s movement up and down — its hills. Horizontal and vertical alignment may, of course, overlap — a winding road up a mountain slope, for example, has aspects of both horizontal (curves) and vertical (mountain slope) alignment.
**subsurface**
Subsurface refers to the stabilized base beneath the pavement. The subsurface provides both a stable base to support the pavement and a finished surface on which to lay or adhere the pavement. It is the subsurface that comes in contact with the ground. For some cultural routes, the subsurface may be the pavement of an earlier era, thus making the subsurface an archaeological resource.

**crown**
The crown of a road is the rise or upward arc toward the center of the travelway that provides for drainage. The crown directs water away to a gutter, shoulder or swale.

**curb**
A curb is a raised face at the edge of the travelway or gutter. Generally 6-12” in height, a curb provides a physical barrier between the travelway and the adjacent sidewalk or landscape. Curbs may be granite, concrete, asphalt, stone, brick or wood.

**gutter**
A gutter is a channel at the edge of the travelway designed to collect and direct surface or rainwater away from the road. Gutters are generally concrete or brick.

**shoulder**
A shoulder is a stabilized surface that runs parallel to and is flush with the travelway. In general a shoulder is utilized for higher speed roads without a curb and gutter. It varies in width and may or may not be constructed of the same material as the travelway. Shoulders are generally viewed as a safety feature—providing a disabled vehicle a safe and easy place to pull over.

**structures**
The road may be associated with essential structures that are integral to its design and function. These may include bridges, culverts, tunnels, tollbooths and retaining walls.

**The Roadside**
The parts of the roadside comprise the area from edge of the shoulder to the area immediately adjacent to the road. These elements enhance features of the road itself, such as, safety or easements. In Nevada, this area generally is from edge of shoulder to the right-of-way fence. The fourteen characteristics are (Marriott 2010: 13-14):

**right-of-way**
The right-of-way includes the road and the adjacent lands parallel to the road under ownership or easement by the transportation department (or other agency or road owner) and includes the road. In many instances the right-of-way also includes road related features (drainage or signage) or general public services (utilities). The right-of-way may exactly equal the width of the road, or may include an area of sidewalks, street trees or bike paths; or land reserved for future highway construction. Some parkways and scenic roads have extensive right-of-ways (in cases extending significant distances from the roadway) for the conservation of natural areas or the provision of a buffer from adjacent development. Historic roadside features may be located within or outside the right-of-way.
clear zone
The clear zone, a safety provision, is a strip of land parallel to the road, and maintained free of rigid or fixed hazards (trees, utility poles, fire hydrants), to enable a vehicle that accidentally leaves the road the opportunity to “recover” and return safely to the road.

swale
A swale is a slight depression or ditch parallel to the road that serves as a collector for rainwater runoff. Swales are most generally found along roads that do not have a curb and gutter system.

barrier
A barrier is a safety feature designed to protect the vehicle from a hazardous situation. Barriers are commonly constructed as guardrail, walls, or posts.

lighting
Lighting refers to both the source of light (and its intensity), and the design of the fixture that supports the light source.

signs
Road-related signs provide information for the traveler about road identification (route numbers), location, direction, distance, warnings and regulations. Other public signs provide visitor information, serve as commemorative or gateway features, or provide visitor orientation.

sidewalks
Sidewalks are durable paved surfaces that generally run parallel to the road and are dedicated to the use of pedestrian (and sometimes bicycle) traffic.

paths
Paths provide access for pedestrians and bicycles and are generally less formally defined than sidewalks. Paths may originate from an unplanned or organic use (people tend to create paths if no other accommodation is provided), or may have been designed. Paths may be unpaved or have a gravel or asphalt surface.

tree lawn
A tree lawn is the area between the curb and sidewalk usually dedicated to the planting of street trees. In some areas this may be referred to as a tree reservation or grass verge.

street trees
Street trees are trees planted parallel, and generally in a formal pattern or spacing, to the road.

utilities
Utilities may be above or below ground and include electric, cable, telephone and fiber optic lines; gas, water, irrigation, storm and sewer pipes; and transformers, service boxes and steam tunnels.
structures
Structures within the right-of-way may include bridges and aqueducts that carry other roads, railroads or water over the road. They may also include administration buildings (often associated with toll roads and bridges) or maintenance structures.

service areas
Service areas may include highway maintenance yards, rest areas or driver/auto plazas providing fuel, food and information.

waysides and overlooks
Waysides and overlooks are pull-offs adjacent to the road designed to provide access to a scenic view, interpretation or historical markers, or picnic tables. Such facilities are generally without restroom facilities.

The Setting
The parts of the setting comprise the area outside of the right-of-way. While the setting is part of the understanding of the road itself, it is highly likely that this area is beyond the control of the state Department of Transportation. The seven characteristics of the setting are (Marriott 2010: 15-17):

roadside architecture
Road-related features include structures and spaces of businesses that are integral to the use of the road. Structures may include gas stations, motor courts, drive-ins, diners or taverns. Seasonal structures may include farm markets, ice cream shops or calm shacks. Some of these structures showcase decorative or fanciful architecture designed to capture the attention of the motorist.

landscape features
Landscape features include parklands, natural areas and plantings designed in conjunction with or resulting from the creation of the road.

character
Character refers to the nature of the landscape or community through which your road passes. It may be rural, suburban or urban in nature. It may be local in character—the temple fronts of Greek Revival farm houses set well back from the road—or it may be more regional in character with businesses catering to the needs of the traveler and defined by the corporate architecture of a gas station. Character may be reinforced through common or repeating elements that create identifiable, even unique, patterns, colors, and styles along the roadside—fences, fields and woodlands, for example.

streetscape
A streetscape defines the physical setting and structures along a road in a settled area. A streetscape, whether urban, suburban or rural, is generally associated with a built-up area or concentration of development. Key characteristics of streetscapes are street trees, lights, utility lines, styles of architecture, relationship of structures to the street (adjacent to the street, setback by a wide lawn), public spaces (walks, plazas, village
greens and parks) and street furnishings (benches, lights, planters, parking meters, mailboxes).

**cultural landscape**  
The cultural landscape defines the patterns, design and structure of a landscape influenced, altered or changed by human activity. Hallmarks of a cultural landscape may include the size and shape of fields and orchards, the characteristic layout of communities (a grid pattern, a linear alignment along a road or settlements at mountain passes or river confluences), or the nature of the road network (along land grant lines, paralleling waterways through a valley or following the dictates of a regional transportation plan). Cultural landscapes are generally not designed by a master landscape architect or planner, but may be “designed” or influenced by the traditions or goals of social, religious or ethnic groups.

**viewshed**  
Viewshed refers to the “view” from a particular point in space. The viewshed encompasses everything that can be seen from this point. A viewshed may be very large, such as the view across a valley from a ridge road, or the view of Lake Tahoe as it stretches to the horizon. It may also be the limited view along a road in a densely wooded area. The viewshed of a road is generally considered the view to the left or right from the centerline of the road.

**foreground, middle ground, background**  
Foreground, middle ground and background are landscape terms that assist in defining the viewshed. Foreground refers to that part of the setting that is immediately adjacent to the road and clearly discernable. Middle ground refers to the near distance where larger features such as trees, roads or buildings may be recognized as individual elements—but not clearly. Background refers to the far distance where only basic forms are discernable and the intensity of the colors in the landscape begins to fade to gray. Naturally, not all viewsheds will possess all three elements.

**Materials and Construction**  
Other elements of the road are the materials and construction techniques.(Marriott 2010: 17):

**materials**  
Construction materials for historic roads may include concrete, brick, stone, iron, steel, aluminum, glass and wood. Landscape materials, materials consciously designed and installed as a part of the road environment, may include trees, shrubs, groundcovers and flowers. Materials may be highly visible, such the iron or steel on a bridge, a row of trees in full bloom, or invisible, such the gravel sub-base over which an asphalt street is laid.

**construction**  
Construction techniques for historic roads will address dimensions (thickness, width, height and depth), assembly (mortar, steel reinforcing, nuts and bolts, rolling, compacting and anchoring) and applications (painting, galvanizing and liquid treatments such as tar and asphalt). Like any historic property, construction techniques may be
Attachment A: Transportation Historical Context

... economical and efficient or the result of an experienced craftsperson employed due to a recognized skill or talent.

Length
Length of a cut-off road segment is integral to its significance. The length of a cut-off segment of a road is crucial to interpreting that segment’s significance. In Iowa (Ingalls 2009), Arizona (Keane et al. 2004) and New Jersey (KSK Architects et al. 2011), length of the road segment has been determined to be one of the key characteristics in conveying setting and feeling. While no one agrees on the minimum length that must be present, many agree on one-fifth (about 1000 feet) of a mile as being a starting point. In Iowa, there is differentiation between straight and curved segments, it being thought that curved segments convey more feeling and setting given the faster change of scenery and the extra motion of the automobile going around the curve. For this reason, in Nevada, a starting point for the consideration of setting and feeling from the segment length will start at one-mile for the vast amount of straight road segments and one-fifth of a mile for curved segments.

State Route 445 – the Pyramid Highway
The documented history of the Pyramid Highway (SR 445) starts in 1935. Prior to that, the 1893 US Geological Survey Map shows that there is no road in the area. At that time, there were two ways to travel to Pyramid Lake, one route through Sun Valley and the other along the eastern edge of the Spanish Springs.

Sometime between 1893 and 1935 a road was developed between Sparks and Pyramid Lake that traveled through Spanish Springs Valley. This was most likely a cultural road, with a dirt travelway and little or no engineered features. In 1934-1935 the Nevada Department of Highways developed plans to improve this road, now known as the Pyramid Highway, or SR 445.

A 1935 plan set shows the pre-1934 alignment of the Pyramid Highway. The 1935 plans called for straightening tight curves and switchbacks. The work of improving a 6.283 mile section of the Pyramid Highway containing SHPO Resource #S821 was done with day-labor and completed in August of 1934. The use of day-labor meant that there are no “as-built” plans in the NDOT archives. However, a 22.496 mile section of the Pyramid Highway, just north of S821 (designated on the plan set as “NRS#123B”) was built with designed plans in 1935. Plan set cross sections of segment NRS#123B shows that the road was built with a 26’ wide travelway made of select borrow material (dirt) that allows for two 10’ wide lanes and two 3’ wide shoulders. The slopes bordering the road had a 6:1 ratio, taking 21’ with a 2:1 back slope back to ground level. The road surface originally would have been “select material” or compacted dirt and gravel. The road was probably “oiled” soon after construction as the 1930s Nevada Highway Department biennial reports refers to the Pyramid Highway as having an oiled surface. To make an oiled road, oil was sprayed onto the surface of a dirt or graveled road. Heat from the sun and compaction from vehicles turned the oil into a thin pavement-like layer that helped protect the road from water erosion. The 6.283 section of the highway containing S821 and section NRS#123B would have been built to similar widths with similar materials.

In 1959, the Pyramid Highway alignment was straightened again and the segments in questions (S821) were cut-off from the functioning roadway. In the 1959 plan set, the existing Pyramid Highway was described as the same 26’ wide travelway that is described above. However, the road surface had changed from dirt, or an oiled surface, to a 1” thick bituminous wearing
surface reinforced with cotton membrane, and a 2 ½” thick roadmix surface. (A “roadmix” surface is simply a mixture of aggregate and bituminous material made on site, as opposed to a “plantmix” which is aggregate and bituminous material mixed at a plant and delivered to a construction site.) The date of the road surface change is uncertain.

The improved 1959 Pyramid Highway became two 12’ wide lanes with two 4’ wide shoulders and a 6:1 slope along the roadside. The surface was 1/2” thick open graded plantmix surface on a 24’ wide travelway. (“Open graded” mix uses larger aggregate than a “dense graded” mix. The benefit of an open grade mix is that the travel surface has more friction, making it safer to travel at higher speeds. However, because of the larger aggregate, open graded mix usually has large air voids in the mixture and is more water permeable.)

Today, the Pyramid Highway follows the 1959 alignment. Further alterations to the road, such as the addition of turn lanes, lane widening, barrier rails, and signage have been made to the road in the intervening years.

References

Ingalls, Marlin R.  

Keane, Melissa, J. Simon Bruder and Kenneth M. Euge  

Marriott, Paul Daniel  

Wallace, Laurel T.  
2004 Historic Highways in the NMDOT System. New Mexico Department of Transportation, Sante Fe, New Mexico.
Attachment D: Character Defining Features of the 1935 Pyramid Highway

The character defining traits of the 1934-1935 Pyramid Highway can be broken down into three categories: the characteristics of the road itself; the elements found in the right-of-way immediately adjacent to the road; and the character of the setting, which includes roadside architecture and the viewshed.

The Pyramid Highway was constructed from 1934 to 1936. The segments of the old Pyramid Highway in the Pyramid-395 Connector Project’s Area of Potential Effect (S821) was built by day laborers without a construction contract, meaning that construction plans and other records of the roads construction were not kept in NDOT archives and are unlikely to exist. The physical appearance of this section of road is based on Nevada Department of Highways Biennial reports, and on construction plans for the adjacent section of the Pyramid Highway, which was constructed through a contractor. The assumption is that the entire Pyramid Highway road was built to the same specifications.

The Road
Prior to 1934, the road from Sparks to Pyramid Lake, through Spanish Springs Valley, was a dirt road with minimal improvements. The 1935 road construction plan set shows that the old road approximately followed the alignment of the new 1935 road, but the new 1935 road eliminated several curves and switchbacks in the old road and generally straightened the road. The road section of old Pyramid Highway constructed in 1934, including S821, had two travel lanes, each measuring 10 feet across. The travel lanes were constructed of three layers. The deepest layer was a 9 inch bed of granite sand. This was covered with 6 inches of gravel, and finally topped with 4 inches of smaller gravel to form the travelway surface. Soon after completion, the graveled surface was coated with oil to make it more waterproof and hold together better. The 1935 plan set instructs the builder that “headwalls shall be placed on both ends of all pipe culverts, except as noted.” Stone headwalls were found on one end of a pipe culvert in Segment B.

A 3 foot dirt shoulder bordered the travel lanes. Outside of the shoulder was a runoff swale that varied in width but generally was about 21’ across with a 6:1 slope. The result was a road that was raised above the natural surface of the ground by a few feet. The roadway was leveled. Gullies were filled in and peaks were graded down but not to the extent that is seen on modern roads. The 1930s Pyramid Highway still followed the natural contours of the earth closely.

The Right-of-Way
The Right-of-Way includes the property or easement along the road owned by the highway department. In Nevada, it is generally 200 feet from centerline, creating a 400 foot wide swath. Historic elements that might be seen in the right-of-way are directional signage, wood mile post markers, streetlights, traffic signals, and concrete or wood right-of-way markers. Probably none of these elements were along the segment of old Pyramid Highway in the APE. The most likely elements to be found are wood mile post markers, and the concrete “N Post” marker that was used to mark the edge of the right of way at the beginning and end of arcs in the road. Concrete N Posts were used from 1919 to 1948 and measured 6” square with the letter “N” for “Nevada” embossed at the top. N Posts may have been placed at the curve in the old Pyramid Highway alignment located in Wedekind Park. Today, there is no evidence of N Post markers, or of mile markers.
Attachment B: Character Defining Features of the 1935 Pyramid Highway

The Setting
The current setting of the old Pyramid Highway would be unrecognizable to the 1935 automobilist. In the 1930s the area was characterized by undeveloped desert views with occasional ranching homesteads and agricultural fields that bordered streams. It would have been a long treeless journey through the high desert.

Today the drive down modern day Pyramid Highway is bordered by housing subdivisions and commercial developments with only the occasional stretch of natural landscape. The segment of the old Pyramid Highway within the APE has been diminished in particular. The construction of the Sparks Crossing Shopping Mall to the east of Segments A and B has replaced rocky hills of sagebrush and rabbitbrush with Bed Bath & Beyond, Dollar Tree, Famous Footwear, Old Navy and a sea of parking lots.
The runoff swale being constructed along an unidentified Nevada road in the 1930s. Similar techniques would have been used to build the Pyramid Highway in the mid 1930s. (NDOT Photo Archives).

Oil being applied to a road in the 1920s, unknown location. Similar equipment would have been used to oil the Pyramid Highway. (NDOT Photo Archives).
Early oiled road in Nevada. Unknown location and date. This photo shows what the surface of an oiled road looked like. The Pyramid Highway was wider with shoulders and a drainage swale (NDOT Photo Archives).

Between 1935 and 1959, the surface of the Pyramid Highway had been improved with a 1” thick bituminous pavement reinforced with “cotton membrane.” This photo from 1937 shows workers applying a cotton membrane, basically a bolt of cotton fabric, to a newly constructed road. (NDOT archives).
1946 aerial photograph of the Pyramid Highway, looking north. At this time the road was two lanes, paved with asphalt. It featured the newly implemented dashed centerline (as opposed to a solid centerline). Painted shoulder lines were not used until 1956.
Attachment B: Character Defining Features of the 1935 Pyramid Highway

Detail of 1946 aerial photograph showing dashed centerline and the neighboring agricultural and desert landscape.

Cross-section of Pyramid Highway from Contract 412, dated March 5, 1935 (NDOT Archive).
### Table 1. Character Defining Traits

<table>
<thead>
<tr>
<th></th>
<th>Historic Condition</th>
<th>Current Condition</th>
</tr>
</thead>
</table>
| **The Road: Pavement** | 1935: graveled road  
Shortly after 1935: oiled road  
Between 1935 and 1959: bituminous paved surface | Majority of road surface has deteriorated. Small sections of asphalt remain.          |
| **The Road: Alignment**| Vertical and horizontal alignment of the road follows the natural contours of the ground closely; there was only minimal excavation and fill used to make the road level. | Alignment remains similar to historic conditions.                                  |
| **The Road: Subsurface**| Two 10-foot travel lanes on a bed of compacted gravel and sand.                    | The majority of the road subsurface has deteriorated. The hard-packed road surface measures about 10 wide. |
| **The Road: Shoulder** | 3’ wide dirt shoulders                                                               | The original shoulders have deteriorated and no longer exist.                     |
| **The Road: Structures**| Pipe culverts were to be faced with stone.                                          | A stone faced culvert exists as part of Segment B. One side of the culvert has been destroyed through erosion. The other side retains good integrity. No other structures are evident. |
| **The Road: Length**   | The old Pyramid Highway stretched approximately 32 miles from Sparks to the southwest side of Pyramid Lake | Segment A is 1,410 feet long and Segment B is 790 feet long. Both segments are cutoff by a steep berm and a crossing street. The two segments of Old Pyramid Highway combined represent .01 percent of the total length of the historic Pyramid Highway. |
| **The Right-of-way: Lighting**| Apart from automobile headlights, there was no lighting on the road.            | Segments A and B are light by the ambient lighting from the modern Pyramid Highway and the neighboring shopping mall. |
| **The Right-of-way: Signs**| Concrete “N Post” ROW markers located at curves in the road. Wood mile post markers located every mile. Historically, there were probably no signs or markers along the segment of Pyramid highway in the APE. | No 1930s related markers or signs in the right of way. |
| **Setting: Roadside architecture**| The area traveled between Sparks and Pyramid Lake was devoid of roadside architecture. A historic photograph from 1946 shows a few ranch buildings that are at a distance to the road. | Segments A and B are boarded by the Sparks Crossing Shopping Development on the east, and the modern alignment of the Pyramid Highway on the west. |
| **Setting: Character** | Undeveloped, rural area.                                                            | Developed urban area with modern residential subdivisions and commercial developments. |
| **Setting: Viewshed**  | Long views of undeveloped desert and occasional agricultural fields.              | Views to the south of the Sparks suburbs.                                          |
Attachment B: Character Defining Features of the 1935 Pyramid Highway

Eligibility Requirements
If a road possesses integrity, it may be eligible under the following criteria:

- A road may be eligible under criterion A if it is associated with specific events, or a broad pattern of events, that are important to history. An example of this would be a road that connects two commercial centers and resulted in significant economic development as a result of the route, or a road that was built as part of a national program of defense leading up to World War II.

- A road may be eligible under criterion B if it is associated with an individual, or individuals, important to history. An example of a road eligible under criterion B would be a road that was designed by a significant road engineer or landscape architect and the road illustrates an important achievement in the individual’s career.

- A road may be eligible under criterion C if it represents a distinctive type, period or method of construction, or was the work of a master. An example of a road eligible under criterion C would be an intact section of road that was constructed as a model for other roads such as the “Ideal Section” of road built as part of the Lincoln Highway, or an aesthetic road designed by a master landscape architect as part of a larger landscape.

- A road may be eligible under criterion D if further intensive study of the materials or method of construction was likely to reveal information that could contribute important information to our understanding of history.

The architectural aspects of integrity that must be present for a road to be considered eligible are design and location. The original alignment and good to excellent integrity of setting are essential elements for a road to convey its historic associations.

Integrity of Segments A and B
Segments A and B of the old Pyramid Highway retain integrity of location. They have poor integrity of design, materials, workmanship, setting, association, and feeling.

Design: Nevada FHWA recommends that at least one mile of road is necessary to convey the original design of a historic road. The essence of a road is that it travels through a landscape. Segments of road shorter than one mile lack the essential quality of a road, especially in areas of relatively level terrain such as the Old Pyramid Highway. Segment A is .27 miles long and Segment B is .15 miles long. Even added together they do not have the length needed to suggest the sense of distance the road once had. The 1935 travelway was 20’ wide (two 10’ wide lanes) with 3’ wide shoulders. Today, the segments of road have eroded to about 10’ wide total. There is no evidence of the shoulder, or the slope along the side of the road.

Materials: The condition of a historic resource may be poor without affecting the integrity. However, in the case of the Old Pyramid Highway, the condition is so deteriorated that character defining features of the highway, such the width of the road, shoulders, subsurface, and surface material are missing. The surface of the road evolved from dirt, to an oiled gravel surface in the 1930s, to a paved asphalt surface in 1959. None of these materials phases of the road are represented.

Location: The two segments of road (.42 miles) retain integrity of location.

Workmanship: Extreme deterioration of the road has diminished the levels of integrity of workmanship. A small culvert, faced with granite ashlar is the only remaining element of the road that displays historic workmanship. The rest of the road has poor integrity of workmanship.
Setting: The Historic Resource Inventory Form documents that the road segments have had “significant loss of their original setting and feeling due to nearby modern development.” Commercial development and the nearby modern Pyramid Highway have significantly changed the historically rural setting of the road.

Feeling: The changes to the setting, coupled with the poor integrity of the resource leave the road with no expression of aesthetic or historic sense of a particular time period.

Justification
Segments A and B of the old Pyramid Highway (S821) are not eligible under criterion A. While the road between Sparks and Pyramid Lake was important to a small population of locals, the travelway cannot be argued to have significantly affected regional economic or social change. Assessment of eligibility of historic roads has been addressed by the Colorado Department of Transportation in 2002 with the production of a context and history prepared by Associated Cultural Resource Experts (ACRE 2002). It was concluded that “…no single highway is likely to be considered historically significant simply because it exists” (ACRE 2002:10:1). The significance of a roadway is determined by the human activities “considered to be important in our past that were facilitated or made possible by the highway. … in general, highways are historically important because of their role in affecting economic and social changes to our society” (ACRE 2002:10:1).

Segments A and B are not eligible under criterion B because scholarly research did not indicate that the Pyramid Highway had any association with persons important to our history.

Segments A and B are not eligible under criterion C. The road is not the work of a master, nor does it possess high artistic values. In their current state of deterioration, the short segments do not embody the distinctive characteristics of a 1930s highway.

Segments A and B are not eligible under criterion D because they are unlikely to yield information important in prehistory or history. The construction method of the road and the materials used are well documented and further study of the road segments is unlikely to reveal new information about early 20th century roads or history. Due to the lack of associated features it is unlikely that further investigation of this site will yield information important to regional questions. Often, the history of a road can best be obtained through archival and documentary sources. The 1935 and 1959 plan sets for the Pyramid Highway are available at the NDOT archives. According to Keane and Bruder (2004:101) “Only rarely is archaeological study of a roadbed alone likely to yield valuable historical information. Similarly, unless road-related features such as culverts, bridges, and retaining walls are not documented in archival records, archaeological recordation is unlikely to provide important information”.

References

ACRE

Keane, Melissa and J. Simon Bruder
2003 Good Roads Everywhere: A History of Road Building in Arizona. Prepared for Arizona Dept. of Transportation Environmental Planning Group
Dear Mr. Abdalla,

Thank you for the additional information regarding the eligibility of the above referenced resource. The information was submitted in correspondence dated March 7, 2013 (received March 8th). The Nevada State Historic Preservation Office (SHPO) has reviewed the information.

Determinations of Eligibility
Based on the Architectural Inventory (revised December 2012) along with the Appendices to the 3.7.13 Letter, the SHPO concurs with FHWA that the following resource is ‘not eligible’ to the National Register of Historic Places (NRHP):

<table>
<thead>
<tr>
<th>#</th>
<th>Resource</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Old Pyramid Highway</td>
<td>S821</td>
<td>Not Eligible</td>
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</table>

Please note eligibility determinations for the remaining resources within the APE were provided in correspondence from SHPO dated August 31, 2011. For reference, a copy of that letter is attached.
The SHPO awaits additional correspondence as the Pyramid Highway-US 395 Connection Project progresses. For questions regarding this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@shpo.nv.gov.

Sincerely,

[Signature]

Rebecca L. Palmer
Acting State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
August 31, 2012

Abdelmoez Abdalla, Environmental Program Manager
US Department of Transportation
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Re: Additional Information for
Determinations of Eligibility for Pyramid Highway-US 395 Connection Project
Architectural Inventory: Pyramid Highway-US 395 Connection Project, Sparks Washoe County, Nevada
EA: 73390 & 73391
FHWA: DE-0191(065) & DE-0191(067)
SHPO Undertaking Number: 2010-0884
SHPO Report Number: 8041

Dear Mr. Abdalla,

Thank you for the additional information. The Nevada State Historic Preservation Office (SHPO) has reviewed the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information submitted in correspondence from FHWA dated and received August 3, 2012, the project consists of converting Pyramid Highway from an existing arterial to a freeway and constructing a new freeway from Pyramid Highway to US 395. At this time, the SHPO has been asked to provide comments regarding eligibility only.

The additional information for this project includes a revised historic context and additional documentation in the form of a Historic Resource Inventory Form (HRIF) for the Orr Dutch. This information addresses SHPO's letter dated March 26, 2012. Thank you.

The revised historic context supports resources evaluated under National Register Criteria A, B, and C. Criteria D was not addressed. This survey did not include archaeological survey, and, thus,
no discussion of Criterion D considerations has been developed. The archaeological resources associated with the proposed undertaking will be described and National Register evaluation recommendations made in a separate report (page 32). Criterion D, while most often applied to archaeological districts and sites, can apply to buildings, structures, and objects (National Register Bulletin 15, page 21).

Electronic correspondence (dated June 14, 2012) from Sara Fogelquist (SHPO) Liz Dickey (NDOT), regarding the revised context, indicates that ‘As long as the context evaluates the resources under all criteria and addresses all of the resources within the APE...then the context would appear to support the eligibility recommendations in the HRIFs.’ At this time, the SHPO recommends that the resources identified within the APE remain unevaluated under Criteria D.

**Resource Identification**

Regarding archaeological resources, the SHPO notes that the APE and the corresponding inventory will be submitted once the design information is available.

Regarding architectural resources, those constructed in 1972 or earlier were documented utilizing Nevada’s Historic Resource Information Form (HRIF). The APE includes 702 parcels and 631 acres. Had the APE been constructed by buffer rather than by parcel the APE would have been more appropriate given the scale and nature of the undertaking (36 CFR 800.15 d). Based on the submitted information:

Thirty-three resources were documented using Nevada’s Historic Resource Inventory Form (HRIF) and 3 potentially eligible historic districts were identified, including the Sierra Vista Ranch Historic District, the Irathenbal Farm Historic District, and the Trost Family/Kiley Ranch Historic District. (Please see list below.)

Based on the submitted information, the SHPO concurs with FHWA that the following 8 resources are not individually eligible but are eligible as contributing resources within the Sierra Vista Historic District (SHPO Resource Number: D93):

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<th>Individual Eligibility</th>
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<tr>
<td>7</td>
<td>B11952</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>8</td>
<td>B11953</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>
Based on the submitted information, the SHPO concurs with FHWA that the following 4 resources are not individually eligible but are eligible as contributing resources within the Trost Family/Kiley Ranch Historic District (SHPO Resource Number: D94):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11951</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11952</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11953</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11954</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>

The HRIF completed for the Trost Family/Kiley Ranch Historic District includes a reference to a previous survey. Finally, another portion of this ranch (Locus 1) has been previously recommended eligible under Criterion D due to its ability to offer significant information pertinent to the research topics detailed in other reports (Peterson and Stoner 2003). This portion of the ranch is outside the current parcel boundary due to subdivision of the ranch and ownership changes during the 2000s. The SHPO notes that per the Architectural Inventory, the cited report completed by Peterson and Stoner was not submitted to SHPO for review (page 59). Please forward a copy of this report for SHPO's records and reference.

Based on the submitted information, the SHPO concurs with FHWA that the following 10 resources are not individually eligible but are eligible as contributing resources within the Hutacabal Farm Historic District (SHPO Resource Number: D94):

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Individual Eligibility</th>
<th>District Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11955</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>2</td>
<td>B11959</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>3</td>
<td>B11960</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>4</td>
<td>B11961</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>5</td>
<td>B11962</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>6</td>
<td>B11963</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>7</td>
<td>B11964</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>8</td>
<td>B11965</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>9</td>
<td>B11966</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
<tr>
<td>10</td>
<td>B11967</td>
<td>Not Eligible</td>
<td>Contributing, A &amp; C</td>
</tr>
</tbody>
</table>

Based on the submitted information, the SHPO concurs with FHWA that the following 2 properties are eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>S820</td>
<td>Eligible, A &amp; U</td>
</tr>
<tr>
<td>2</td>
<td>S828</td>
<td>Eligible, A, B, C</td>
</tr>
</tbody>
</table>
Based on the submitted information, the SHPO concurs with FHWA that the following 10 properties are not eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>B11968</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>2</td>
<td>B11969</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>3</td>
<td>B11970</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>4</td>
<td>B11971</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>5</td>
<td>B11972</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>6</td>
<td>B11973</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>7</td>
<td>B11974</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>8</td>
<td>B11975</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>9</td>
<td>B11976</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>10</td>
<td>B11977</td>
<td>Not Eligible</td>
</tr>
</tbody>
</table>

Based on the submitted information, the SHPO cannot concur with FHWA that the following resource is not eligible for listing in the NRHP.

<table>
<thead>
<tr>
<th>#</th>
<th>SHPO Resource Number</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>S821</td>
<td>Unevaluated</td>
</tr>
</tbody>
</table>

Although the consultant recommended the resource (S821: The Old Pyramid Highway) as eligible under Criteria A, FHWA recommend the resource as not eligible due to diminished integrity.

The HRIF indicates that resource retains its original alignment and that 'Although the segments recorded are in overall fair condition, they are the only known recorded segments of the old highway and are therefore recommended eligible under Criterion A (page 7). The SHPO questions if there are other examples of the Old Pyramid Highway that retain better integrity and that are being preserved.

The architectural inventory indicates that as a form of mitigation for S821 would be the completion of a document to 'place the impacted segments within the greater context of the highway and they development of the local transportation system' (page 73). The SHPO questions why this would be completed for mitigation and not completed as part of a context to support an eligibility recommendation for the resource. Another context that might further support an eligibility recommendation for S821 is A Cultural Resource Inventory for the Pyramid Lake Paiute Tribe's Proposed Pelican Pointe Project, Washoe County, Nevada, which was completed in 2011 by KAUTZ Environmental. A copy is available at the SHPO upon request.

At this time, the SHPO recommends treating S821 as unevaluated.
The SHPO notes that other resources within the APE were identified but were not evaluated on an HRIF. These resources include the Reno Arch Missionary Church (B11979), the Sparks Christian Church (B11978), and the Gibbons/Van Meter House (B11980), all of which are currently in agency review for a different FHWA project.

**Project Effects**

Although this letter is not intended to address project effects, the SHPO notes that there appears to be a discrepancy between FHWA's correspondence dated September 8, 2011 and the architectural inventory (revised June 2012), which was submitted with FHWA's correspondence, dated August 3, 2012.

**Per FHWA correspondence (dated 9.8.11):**

The project is not expected to induce development that would expand the APE beyond those areas stated above. In terms of induced development, this project includes two types of roadway improvements: improvements to existing roads, or construction of new roads. New road construction for this project generally would occur on steeper slopes in BLM-owned property and/or zoned open space. These areas are not likely to be developed in a reasonably foreseeable future due to development restrictions and the costs associated with developing lands on steep slopes, especially when there are currently a large number of vacant commercial buildings available.

New development, as a result of improvements to existing roads, is not expected to exceed the visual APE range because: 1) there is existing available commercial space on Pyramid Highway, 2) the likelihood that development would be commercial along the existing road, 3) development would be as far from the proposed alignment as current development, and 4) the cost of leveling any new parcel in the APE (page 5).

**Per the architectural inventory (revised June 2012):**

Other indirect effects anticipated from the proposed transportation improvement project are likely to include further degradation of the setting of the resources due to increased access that can reasonably be expected to lead to greater traffic volumes. Also, further land development (residential and commercial) on the lands near and around the historic properties is anticipated because of increased accessibility offered by the highway improvements. These effects could best be mitigated through the photo-documentation of the historic properties accompanied by intensive archival and oral history research of the three historic districts and the Spanish Springs Valley. Similarly, the cumulative effect of the project is likely to be further urban growth and the degradation of the setting of the historic properties (page 72).

Additionally, regarding the Trosi/Kiley Ranch, per the architectural inventory (revised June 2012): There are other buildings, including a barn, that were visible from the road and appear to be historically associated with the ranch, but are today outside of the parcel (page 63).
And:

The anticipated viewshed alterations at the Trost Family/Kiley Ranch will involve the introduction of a new intersection and transition from grade level to elevated highway west and northeast of the historic district (page 64).

Based on the information noted above, there appears to be additional, visible resources that were not included in the Area of Potential Effect (APE), given the proposed project description. Although the Programmatic Agreement (PA) for this undertaking is still in draft, the SHPO will require a reevaluation of the APE for visual, audible, atmospheric, and cumulative effects in this document.

If you have questions regarding the architectural contents of this correspondence, please contact Sara Fogelquist, Architectural Historian, at 775-684-3427 or sfogelquist@shpo.nv.gov.

Sincerely,

Karyn de Dufruit
Deputy State Historic Preservation Officer

cc: C. Cliff Creger, NDOT
In Reply Refer To:
HENV-NV

Ms. Rebecca Palmer
State Historic Preservation Officer
Nevada State Historic Preservation Office
901 S. Stewart Street, Suite 5004
Carson City, Nevada 89701-4285

Subject: Pyramid Highway/US 395 Connector Project, Reno, Washoe County, Nevada
EA #: 73390 & 73391; NDOT #:WA11-009; FHWA #: DE-0191(065) & DE-019(067);
SHPO Undertaking #: 2010-0884; SHPO Report #: 8041

Dear Ms. Palmer:

As you know, the Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is proposing a project to improve traffic flow along the Pyramid Highway from Queen Way to Calle de la Plata Drive, in Washoe County. The project also includes a connector route from US 395 to the Pyramid Highway (SR 445) through the Sun Valley neighborhood in the northwestern portion of the Reno metro area. We previously consulted with you regarding the Area of Potential Effect (APE) and eligibility and effects to historic architectural resources identified in the study area, which include the Sierra Vista Ranch Historic District, the Trosi Family/Kiley Ranch Historic District, the Iratcabal Farm Historic District, and the Prosser Valley Ditch.

The purpose of this letter is to provide information about the identification of the Preferred Alternative, design changes that occurred after the Draft EIS was issued and results of the archaeological inventory that was conducted in late 2014/early 2015. It also provides FHWA’s eligibility and effect determinations for archaeological resources identified in the inventory, and requests your concurrence on these determinations. For details about methods used and archaeological sites evaluated during the inventory, please refer to the enclosed report entitled, A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada. (Western Cultural Resource Management [WCRM], 2015).

The Draft Environmental Impact Statement (Draft EIS) was issued in August 2013, which evaluated a No-Action Alternative and four build alternatives to meet the purpose and need of the Pyramid Highway/US 395 Connector project.
Design Changes since the Draft EIS and Identified Preferred Alternative
Build Alternative 3 was identified in early 2014 as the Preferred Alternative after the Draft EIS comment period concluded. The design of Alternative 3 was then modified based on the updated traffic analysis that was conducted later in 2014 for the Final EIS that is currently being prepared, resulting in a reduced project footprint. This modified alternative is referred to as “Revised Alternative 3,” and is shown on Figure 1. Under Revised Alternative 3 (Preferred Alternative), Pyramid Highway would be constructed as a limited-access arterial from Calle de la Plata south to the US 395 Connector directional interchange located between Golden View and Kiley Parkway. From that point, Pyramid Highway would be constructed as an arterial south to Queen Way. No frontage roads are proposed. A new grade-separated diamond interchange would be built at Highland Ranch Parkway/Sparks Boulevard, with Pyramid Highway crossing over Sparks Boulevard. No other grade-separated interchanges are proposed along Pyramid Highway. The US 395 Connector would veer southwest on a ridge alignment, and Disc Drive would be extended west to tie into the new US 395 Connector. The US 395 Connector would include a southern crossing of Sun Valley Boulevard south of Rampion Way. Revised Alternative 3 would include construction of an interchange west of Sun Valley Boulevard and modifications to the existing US 395/Parr Boulevard interchange.

Preliminary Archaeological Survey - 2012
A preliminary “walkover” archaeological survey was conducted in 2012 of the four build alternative footprints to identify any potential archeological resources to be considered as the EIS process moved forward and in the selection of a preferred alternative. The survey consisted of a file and literature search and walkover pedestrian survey. It identified approximately 100 sites with refuse scatters/dumps, two-track road systems, prospect pits/trenches, mining complexes, and ditches. On preliminary review, the nature of these sites likely made them important for what could be learned from data recovery, if they were found to be eligible after site recordation. These sites were expected to have minimal value for preservation in place because they do not embody other values besides data and are not considered sites of transcendent importance to archaeology.

Archaeological Inventory - 2014/2015
A Class III intensive pedestrian archaeological inventory was conducted in late 2014/early 2015 of the Archaeological APE, and is documented in the enclosed report entitled, A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada. (Western Cultural Resource Management [WCRM], 2015). The Archaeological APE includes the Revised Alternative 3 (Preferred Alternative) footprint and a 100-foot-wide buffer on each side of the construction footprint to encompass direct effects from ground-disturbing activities and any applicable indirect effects. The file search conducted on the Reno-Sparks Indian Colony parcel located at Pyramid Highway and Eagle Canyon Drive revealed that no previously recorded sites have been identified on the site. Because the identified Preferred Alternative (Revised Alternative 3) would avoid direct impacts to the RSIC parcel, further investigation of the parcel as part of the archaeological inventory was deemed unnecessary.
The inventory resulted in the documentation of 62 previously unrecorded archaeological sites and 40 isolated finds. In addition, an attempt was made to revisit 21 previously recorded sites. Of the newly recorded sites, 45 are historic, 2 are prehistoric and 15 have both historic and prehistoric components. Of the previously recorded sites, six have been destroyed by development unrelated to this project and no longer exist; one site has been destroyed with the exception of a single isolated artifact, and three are isolated artifacts that could not be relocated. The 11 remaining previously recorded sites were revisited and reevaluated for significance to the National Register of Historic Places (NRHP). Of the 21 previously recorded sites, 17 are historic, 2 are prehistoric, and 2 are multicomponent.

Of the 21 previously recorded sites in the project area, four are isolated artifacts and are categorically Not Eligible for the NRHP. Six sites no longer exist; six sites have been determined Not Eligible for the NRHP; four sites have been recommended Not Eligible for the NRHP; and one site has been determined Eligible for the NRHP under Criteria A and B (Prosser Valley Ditch, Site #26Wa6134).

Of the 62 newly recorded sites, 59 are recommended Not Eligible for the NRHP under any criteria, and three of the newly documented sites are recommended Eligible for the NRHP under Criterion D (Site #s 26Wa9822, 26Wa9841, and 26Wa9856).

A finding of Adverse Effect is recommended for Site #26Wa6134 (Prosser Valley Ditch) because it would be altered by the Preferred Alternative (Revised Alternative 3). Non-data recovery treatments are recommended for this site.

The Study team evaluated the Preferred Alternative (Revised Alternative 3) alignment to determine if impacts to the three sites eligible for the NRHP under Criterion D (Sites 26Wa9822, 26Wa9841, and 26Wa9856) could be avoided or minimized. It was found that moving the Preferred Alternative alignment to avoid or minimize impacts to two of the sites (Sites 26Wa9822 and 26Wa9841) is not feasible or practical. Due to the topographic conditions, any alignment shift would greatly increase earthwork and costs. Therefore, the Preferred Alternative will result in an Adverse Effect to those two sites (Site #s 26Wa9822 and 26Wa9841), and a treatment plan will be developed as stipulated in the Programmatic Agreement. For the third site eligible for the NRHP under Criterion D (Site #26Wa9856), the design team confirmed that impacts to the site can be avoided by minor design modifications, such as slightly steepening the slope. Therefore, FHWA recommends that the Preferred Alternative will result in No Historic Properties Affected for Site #26Wa9856.

Previously recorded sites and newly recorded sites that are not recommended Eligible for the NRHP and their effect recommendations are summarized in Table A, and those that are recommended Eligible for the NRHP and their effect recommendations are summarized in Table B.
<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Determination/ Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previously Recorded Sites</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26Wa3259</td>
<td>Historic</td>
<td>Building Vestige</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa3408</td>
<td>Historic</td>
<td>Historic Trash Scatter</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa5398</td>
<td>Historic</td>
<td>Prospects and Modern Trash Midden</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa5400</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa5403</td>
<td>Prehistoric</td>
<td>Prehistoric Isolated Artifact</td>
<td>NA; isolates are categorically not eligible to the NRHP</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa5404</td>
<td>Historic</td>
<td>Historic Isolated Artifact</td>
<td>NA; isolates are categorically not eligible to the NRHP</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa5405</td>
<td>Historic</td>
<td>Historic Isolated Artifact</td>
<td>NA; isolates are categorically not eligible to the NRHP</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa6543</td>
<td>Prehistoric</td>
<td>Simple Lithic Assemblage</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa6673</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa6674</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa6966</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa6977</td>
<td>CrNV-03-5508</td>
<td>Historic Transportation - Road</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa7122</td>
<td>Historic</td>
<td>Farming or Ranching Activity Site</td>
<td>NA, site no longer exists</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>26Wa7123</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa8267</td>
<td>CrNV-03-5834</td>
<td>Historic Debris Scatter</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9240</td>
<td>CrNV-03-5796</td>
<td>Historic Prospect Complex</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9241</td>
<td>CrNV-03-5795</td>
<td>Historic Prospect Complex</td>
<td>Determined Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9843</td>
<td>Historic</td>
<td>Refuse Dump</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9845</td>
<td>Prehistoric; Historic/ Multi-component</td>
<td>Simple Lithic Assemblage; Debris Scatter</td>
<td>Rec. Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9846</td>
<td>Prehistoric; Historic/ Multi-component</td>
<td>Simple Lithic Assemblage; Historic Isolated Artifact</td>
<td>NA; site no longer exists except for one isolated artifact which is categorically not eligible to the NRHP</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
</tbody>
</table>

<p>| Newly Recorded Sites |
| 26Wa9775 | CrNV-03-9618 | Prehistoric | Simple Lithic Assemblage | Non-Significant/Not Eligible | No Historic Properties Affected | No Further Work |</p>
<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/ Component</th>
<th>Site Type</th>
<th>Eligibility Determination/ Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>26Wa9776</td>
<td>CrNV-03-9619</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Isolated Historic Prospect</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9777</td>
<td>CrNV-03-9620</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9778</td>
<td>CrNV-03-9621</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Simple Food Processing Site; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9779</td>
<td>CrNV-03-9622</td>
<td>Prehistoric Isolated Artifact; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
<td></td>
</tr>
<tr>
<td>26Wa9780</td>
<td>CrNV-03-9623</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9781</td>
<td>CrNV-03-9624</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9782</td>
<td>CrNV-03-9625</td>
<td>Historic</td>
<td>Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9783</td>
<td>CrNV-03-9626</td>
<td>Historic</td>
<td>Prospect Complex</td>
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<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
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<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9785</td>
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<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Isolated Artifact; Mining Complex; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
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<td>26Wa9786</td>
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</tr>
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</tr>
<tr>
<td>26Wa9791</td>
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<td>Prehistoric; Historic/ Multicomponent</td>
<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
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<td>No Further Work</td>
</tr>
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<td>Prehistoric; Unknown/ Multicomponent</td>
<td>Prehistoric isolated artifact; Prospect complex and stacked rock feature of unknown age</td>
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<td>No Further Work</td>
</tr>
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</tr>
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<td>State #</td>
<td>BLM#</td>
<td>Site Temporal Affiliation/Component</td>
<td>Site Type</td>
<td>Eligibility Determination/Recommendation</td>
<td>Recommendation of Effect</td>
<td>Management Recommendation</td>
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<td>No Historic Properties Affected</td>
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</tr>
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<td>Historic</td>
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<td>No Historic Properties Affected</td>
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<td>26Wa9806</td>
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<td>Prehistoric Simple Lithic Assemblage</td>
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<td>Prospect Complex</td>
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<td>Non-Significant/Not Eligible</td>
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<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<tr>
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<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<tr>
<td>26Wa9837</td>
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<td>Historic</td>
<td>Refuse Dump</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
</tbody>
</table>
**Table A. Sites Not Eligible for the NRHP**

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Determination/Recommendation</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
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<tbody>
<tr>
<td>26Wa9839</td>
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<td>No Historic Properties Affected</td>
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<tr>
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<td>Prospecting Complex</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
<td>26Wa9847</td>
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<td>Transportation - Road</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
<tr>
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<td>Historic</td>
<td>Refuse Dump</td>
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<td>No Further Work</td>
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<td>Non-Significant/Not Eligible</td>
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<tr>
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<td>Non-Significant/Not Eligible</td>
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<td>No Further Work</td>
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<tr>
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<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<td>Prehistoric Isolated Artifact; Debris Scatter</td>
<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
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<td>Prehistoric Simple Lithic Assemblage; Prospect Complex</td>
<td>Non-Significant/Not Eligible</td>
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<td>Non-Significant/Not Eligible</td>
<td>No Historic Properties Affected</td>
<td>No Further Work</td>
</tr>
</tbody>
</table>

Source: WCRM, 2015

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**Table B. Recommended/Determined Eligible Sites**

<table>
<thead>
<tr>
<th>State #</th>
<th>BLM#</th>
<th>Site Temporal Affiliation/Component</th>
<th>Site Type</th>
<th>Eligibility Rec.</th>
<th>Recommendation of Effect</th>
<th>Management Recommendation</th>
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<td><strong>Previously Recorded</strong></td>
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</tr>
<tr>
<td>26Wa6134</td>
<td>CrNV-31-4843</td>
<td>Historic</td>
<td>Irrigation Ditch</td>
<td>Determined Eligible under Criteria A and B</td>
<td>Adverse Effect; Segment C will be directly impacted by the project</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td><strong>Newly Recorded Sites</strong></td>
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<td></td>
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</tr>
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<td>CrNV-03-9665</td>
<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction Prospect Complex</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic - Not Eligible</td>
<td>Adverse Effect; Site is located within the project disturbance footprint</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td>State #</td>
<td>BLM#</td>
<td>Site Temporal Affiliation/Component</td>
<td>Site Type</td>
<td>Eligibility Rec.</td>
<td>Recommendation of Management</td>
<td>Management Recommendation</td>
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<td>26Wa9841</td>
<td>N/A</td>
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<td>Quarry/Intensive Lithic Reduction Site; possible Historic Isolated Feature</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic – Not Eligible</td>
<td>Adverse Effect; Site is located within the project disturbance footprint</td>
<td>Mitigate Adverse Effects</td>
</tr>
<tr>
<td>26Wa9856</td>
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<td>Prehistoric; Historic/ Multicomponent</td>
<td>Quarry/Intensive Lithic Reduction; Prospect Complex</td>
<td>Prehistoric Component Recommended Eligible (Criterion D); Historic – Not Eligible</td>
<td>No Historic Properties Affected because site can be avoided through minor design modifications</td>
<td>No further work</td>
</tr>
</tbody>
</table>

Source: WCRM, 2015

Summary

**Historic Architectural Resources:** Through previous Section 106 consultation, it was determined, and you have concurred, that there are four NRHP eligible historic architectural resources within the project's APE. Those resources and effect determinations are listed below:

- Sierra Vista Ranch Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Trosi Family/Kiley Ranch Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Irracaball Farm Historic District: Eligible under Criteria A and C. Recommended effect: No Adverse Effect
- Prosser Valley Ditch Segment C: Eligible under Criteria A and B. Recommended effect: Adverse Effect

**Archaeological Resources:** FHWA is recommending the following eligibility and effect determinations for archaeological resources identified within the Preferred Alternative footprint:

- Site #26Wa9822: Eligible under Criterion D. Recommended effect: Adverse Effect
- Site #26Wa9841: Eligible under Criterion D. Recommended effect: Adverse Effect
- Site #26Wa9856: Eligible under Criterion D. Recommended effect: No Historic Properties Affected

**Section 4(f) Exception (23 CFR 774.13[b])**

Based on the foregoing information and findings in the enclosed report, FHWA has concluded that Site #26Wa9822, Site #26Wa9841, and Site #26Wa9856 are important chiefly because of what can be learned by data recovery and have minimal value for preservation in place; therefore, section 4 (f) evaluation is not required.

Based on the above information and enclosed report, we request your concurrence on the eligibility determinations as stated in Tables A and B, and the effect determination of adverse for the project level effect and the individual determination of effect for sites 26Wa9822, 26Wa9841, and 26Wa9856 as stated above.
If you have any questions please contact Cliff Creger of NDOT at 775-888-7666 or myself at 775-687-1231.

Sincerely,

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures:

Figure 1: Revised Alternative 3 (Preferred Alternative)
A Class III Cultural Resources Inventory for the Pyramid Highway/US 395 Connection Project in Washoe County, Nevada. (Western Cultural Resource Management [WCRM], 2015)

cc: Vinton Hawley, Pyramid Lake Paiute Tribe
    Arlan Melendez, Reno-Sparks Indian Colony
    Neil Mortimer, Washoe Tribe of Nevada and California

ec: C. Cliff Creger, NDOT
    C. Young, NDOT
    E. Dickey, NDOT
    Doug Maloy, RTC
    Jim Clarke, Jacobs
Figure 1. Revised Alternative 3 (Preferred Alternative)
Ms. Rebecca Palmer  
State Historic Preservation Officer  
State Historic Preservation Office  
901 S. Stewart Street, Suite 5004  
Carson City, Nevada 89701-4285  

Subject: Additional Information for Pyramid-US 395 Connector Project, Washoe County, NV  
EA #: 73390 & 73391; NDOT #: WA11-009; FHWA #: DE-019(1065); SHPO Undertaking #: 2010-0884; SHPO Report #: 8041

Dear Ms. Palmer:

As you know, the Regional Transportation Commission of Washoe County (RTC), in cooperation with the Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) is proposing a project to improve traffic flow along the Pyramid Highway from Queen Way to Calle de la Plata Drive, in Washoe County. The project also includes a connector route from US 395 to the Pyramid Highway (SR 445) through the Sun Valley neighborhood in the northwestern portion of the Reno metro area.

We previously consulted with you regarding the Area of Potential Effect (APE) and eligibility and effects to four historic architectural resources identified in the study area (see Figure 1), which include the Sierra Vista Ranch Historic District, the Trosi Family/Kiley Ranch Historic District, the Iracabal Farm Historic District, and the Prosser Valley Ditch. Through our previous consultation, it was determined that those resources are eligible for the National Register of Historic Places (NRHP), and that the proposed action would result in no adverse effect to the three historic districts and an adverse effect to the Prosser Valley Ditch.

The purpose of this letter is to provide updated project information, any changes in impacts to these historic architectural resources that may have resulted from recent project design changes, and effect determinations.

Project Changes after the Draft EIS
The Draft Environmental Impact Statement (Draft EIS) was issued in August 2013, which evaluated a No-Action Alternative and four build alternatives to meet the purpose and need of


the Pyramid Highway/US 395 Connector project. Build Alternative 3 was identified in early 2014 as the Preferred Alternative after the Draft EIS comment period concluded.

The design of Alternative 3 then was modified based on the updated traffic analysis that was conducted later in 2014 for the Final EIS, resulting in a reduced project footprint. This modified alternative is referred to as “Revised Alternative 3,” and is shown on Figure 2. Under Revised Alternative 3, Pyramid Highway would be constructed as a limited-access arterial from Calle de la Plata south to the US 395 Connector directional interchange located between Golden View and Kiley Parkway. From that point, Pyramid Highway would be constructed as an arterial south to Queen Way. No frontage roads are proposed. A new grade-separated diamond interchange would be built at Highland Ranch Parkway/Sparks Boulevard, with Pyramid Highway crossing over Sparks Boulevard. No other grade-separated interchanges are proposed along Pyramid Highway. The US 395 Connector would veer southwest on a ridge alignment, and Disc Drive would be extended west to tie into the new US 395 Connector. The US 395 Connector would include a southern crossing of Sun Valley Boulevard south of Rampion Way. Revised Alternative 3 would include construction of an interchange west of Sun Valley Boulevard and modifications to the existing US 395/Parr Boulevard interchange.

Changes in Impacts to Historic Architectural Resources
The Revised Alternative 3 results in reduced impacts to the historic architectural resources listed below as a result of the reduced project design.

1. **Sierra Vista Ranch Historic District.** Revised Alternative 3 design would result in reduced visual effects to this historic district compared to the build alternatives. The Revised Alternative 3 would no longer include a grade-separated intersection at Pyramid Highway and Dolores Drive. Instead, the intersection would remain at-grade and traffic signals would be added. The feeder road running southeast from the new intersection would still be provided under the Preferred Alternative. Like the other build alternatives, the Revised Alternative 3 would not alter, remove, or destroy any of the buildings eligible for the NRHP at the site or take lands from the historic district. Further, the Revised Alternative 3 would not change the character of use or physical features within the site’s setting that contribute to the historic significance of the site’s buildings. The terrain between the site and the Pyramid Highway is relatively level. Without modification, intersection traffic signals provided under the Revised Alternative 3 would have introduced new visual elements into the setting of the site, and new audible elements would have been introduced into the site’s setting as a result of anticipated traffic increases that would diminish the integrity of the property’s significant historic features. However, these visual and audible effects will be avoided by implementation of avoidance measures. To avoid visual and audible impacts to this resource, RTC and/or NDOT will plant one or more lines of trees along the western boundary of the district to form a living visual barrier between the district and Pyramid Highway. RTC and/or NDOT will complete a 35mm photo study of the district and its built environment that includes the visual setting of the district in a westerly direction to document the existing setting for posterity.

2. **Trosi Family/Kiley Ranch Historic District.** The Revised Alternative 3 would improve Pyramid Highway to a six-lane arterial in this area (instead of a freeway), and include a
grade-separated interchange at Sparks Boulevard, with Pyramid Highway crossing over Sparks Boulevard. The interchange would still be located approximately 800 feet northwest of the Trosi Family/Kiley Ranch site. As such, impacts from the Revised Alternative 3 to this resource would be the same as those assessed for the original Alternative 3. To avoid visual and audible impacts to this resource, RTC and/or NDOT will introduce landscaping in the proposed intersection and highway transition design to form a visual break between the district and Pyramid Highway. This may involve a combination of earthen berms and one or more lines of trees planted along the western and northern boundaries of the district to form a visual barrier between the district and the highway. RTC and/or NDOT will complete a 35mm photo study of the district and its built environment that includes the visual setting of the district, paying special attention to the setting to the west and northwest to document the existing setting for posterity.

3. **Iratcabal Farm Historic District.** The Revised Alternative 3 would include a widening of Disc Drive, located north of the Iratcabal Farm Historic District boundary. Impacts from the Revised Alternative 3 would generally be the same as those described for the original Alternative 3. To avoid visual and audible impacts to this resource, RTC and/or NDOT will plant one or more lines of trees along the western and northern historic district boundaries to create a visual barrier between the farm and the highway improvements. RTC and/or NDOT will complete a 35mm photo study that the district that focuses on its built environment and the visual setting of the district in a westerly direction toward the Pyramid Highway and toward the north and northwest looking at the view shed that includes Disc Drive in order to document the existing setting for posterity.

4. **Prosser Valley Ditch:** The Revised Alternative 3 would result in greatly reduced impacts to the ditch compared to the original Alternative 3. The ditch would be impacted by construction of a 10-foot-wide shared-use pathway that would be provided west of Sun Valley Boulevard (see Figure 3). The pathway would cross over the ditch via a bridge and result in approximately 32 linear feet of temporary impacts, and approximately 25 linear feet of permanent impacts to the ditch, compared to the approximately 120 feet of impacts under the original Alternative 3. Further, existing Dandini Boulevard would be abandoned where it currently crosses the ditch, and the ditch would be restored in that area through roadway removal, grading, and reseeding with native species.

Based on the foregoing, FHWA recommends that effects to the historic architectural resources listed above remain unchanged from the effects determined under previous consultation, and that the project will still result in the same determination of effects in the letters from the SHPO dated August 21, 2012 and April 3, 2013.

If you have any questions please contact Cliff Creger of NDOT at 775-888-6666 or myself at 775-687-1231.
Sincerely,

A.a. Abdalla

Abdelmoez A. Abdalla
Environmental Program Manager

Enclosures:

Figure 1: NRHP Eligible Historic Properties and the Area of Potential Effect (APE)
Figure 2: Revised Alternative 3 (Preferred Alternative)
Figure 3: Prosser Valley Ditch Impacts under Revised Alternative 3

cc: C. Cliff Creger, NDOT
    C. Young, NDOT
    E. Dickey, NDOT
    Doug Maloy, RTC
    Jim Clarke, Jacobs
    Greg Novak, FHWA
Figure 1. NRHP Eligible Historic Properties and the Area of Potential Effect (APE)
Figure 2. Revised Alternative 3 (Preferred Alternative)
Figure 3. Prosser Valley Ditch Impacts under Revised Alternative 3

- Dandini Blvd. removed in this area
- Prosser Valley Ditch
  - Approx. 32 linear ft - temp impacts
  - 25 linear ft - perm impacts
- 10 ft Path

Note: ditch does not actually extend into temp impact area here