

RECORD OF DECISION
For
Environmental Impact Statement and Section 4(f) Evaluation Study
I-15 Corridor Improvements and Local Arterial Improvements
Project NEON

Clark County, Las Vegas, Nevada
NDOT Project I.D. 73457E1P
FHWA-NV-EIS-09-01-F

1. Decision

The Federal Highway Administration (FHWA) and the Nevada Department of Transportation (NDOT) have identified the Selected Alternative for improving Interstate 15 (I-15) and major street connections from south of the Sahara Avenue/I-15 interchange to the I-15/US 95/I-515 interchange. In the Draft Environmental Impact Statement (DEIS) and Final EIS (FEIS), this project is known as Project NEON. The Selected Alternative identified and discussed in this Record of Decision is the preferred alternative identified in the FEIS (Alternative G). The 3.7-mile-long Selected Alternative includes adding additional capacity to accommodate forecasted traffic growth and separate regional traffic passing through the Las Vegas area from traffic destined for local interchanges. High-occupancy vehicle (HOV) lanes are also proposed. The project also includes improvements to several local arterials that will address transportation deficiencies on I-15 (Exhibit 1).

The purpose of the I-15 and street improvements is threefold:

- Improve traffic operations by separating freeway traffic from arterial traffic.
- Improve safety by reducing the merge and diverge sections.
- Improve mobility by increasing I-15 capacity, reducing demand, or both.

Secondary purposes are to accommodate economic redevelopment through improved access to downtown Las Vegas and the Resort Corridor, and to accommodate traffic that will use HOV lanes from Sahara Avenue to existing HOV lanes on US 95.

The need for the proposed action is based on existing and future corridor deficiencies that are a combination of factors related to existing and future congestion (traffic demand/capacity), crash rates, operations deficiencies, and system linkage.

The Selected Alternative is described in Section 4 of this document and in Section 2.2.2 of the FEIS. The remainder of this document identifies the rationale for the Selected Alternative and responds to substantive comments received on the FEIS. The FHWA's identification of the Selected Alternative was based upon full consideration of information in the DEIS (approved in September 2009), the FEIS (approved in May 2010) and public and agency comments received.

This Record of Decision complies with the regulations of the National Environmental Policy

Act (NEPA), implementing NEPA (40 CFR 1505.2), and FHWA requirements (23 CFR 771 and 774).

2. Alternatives Considered

2.1 Transportation Demand Management and Transportation System Management

The Transportation Demand Management (TDM) Alternative, which is designed to reduce passenger vehicle trips through increased transit ridership and other strategies, was eliminated as a stand-alone alternative because there would not be a large enough mode shift from passenger vehicles to transit to safely accommodate future traffic volumes at an acceptable level of service. In addition this alternative would not address existing I-15 geometric deficiencies and interchange design deficiencies. Although TDM is not a feasible stand-alone solution to meeting the project's purpose and need, Project NEON would not preclude implementation of TDM measures and would facilitate express transit in the project's proposed HOV lanes and allow transit on the new arterial connections (e.g. Martin Luther King Boulevard/Industrial Road Connector).

The Transportation System Management (TSM) Alternative within the project area includes ramp metering, traffic cameras, dynamic message signs, freeway service patrol vehicles, and an incident management program to maximize the efficiency of I-15. The TSM Alternative was eliminated as a stand-alone alternative, because it would be unable to safely accommodate future traffic volumes at an acceptable Level of service or address the I-15 geometric deficiencies and interchange design deficiencies. However, the TSM elements noted above, which are already in operation on I-15, will be maintained and expanded as part of the Selected Alternative.

2.2 Other Build Alternatives Considered

Between 2003 and 2008, NDOT and FHWA evaluated a range of alternatives for I-15 and the project's local arterial improvements. A detailed description and comparison of the early I-15 project concepts and alternatives and local arterial alternatives is found in *Alternatives Design Report Volumes 1 and 2* (Parsons 2006a). This report is found on the CD at the back of the FEIS. Information about these alternatives can be found in Chapter 2 (Section 2.4.2) of the FEIS.

NDOT and FHWA initially evaluated improvements only to I-15 (widening only, and widening in conjunction with collector-distributor (C-D) roads or direct connectors to US 95) without any related arterial improvements. These concepts, referred to as A, B, and C, were dismissed from consideration because NDOT and FHWA concluded that, although improvements to I-15 are needed, I-15 improvements alone would not provide enough improvements in safety and traffic operations to meet the project's purpose and need. As a result, several other components that would address the purpose and need of the project such as reconstructing the I-15/Charleston Boulevard interchange, the Martin Luther King Boulevard/Industrial Road connector, and the Oakey Boulevard/Wyoming Avenue Overpass were evaluated in addition to reconstructing I-15. The concepts were evaluated against several criteria including traffic operations, safety, and socioeconomic and environmental impacts.

Alternative D was developed by NDOT from the initial concepts considered for I-15. It would provide four to six through lanes plus auxiliary lanes for northbound I-15 traffic and five to six through lanes plus auxiliary lanes for southbound I-15. A direct connector from I-15

northbound to US 95 northbound would begin at Sahara Avenue and carry traffic destined to northbound US 95 and Martin Luther King Boulevard, and motorists destined to the new Alta Drive/Bonneville Avenue exit ramp. The direct connector would not reconnect with northbound I-15; instead, it would connect to the existing ramp from northbound I-15 to northbound US 95. The northbound I-15 mainline would accommodate through travel on I-15 and connect to southbound US 95/I-515.

The I-15/Charleston Boulevard interchange would be reconstructed as a single-point urban interchange under Alternative D. Alternative D also includes the Martin Luther King/Industrial Road connector over I-15 and the Oakey Boulevard/Wyoming Avenue railroad overpass. Alternative D would leave space in the I-15 median for future HOV lanes, but HOV lanes would not be constructed under this alternative. Residential and business displacements under Alternative D would be comparable to Alternatives G and H.

In March 2005, NDOT and FHWA sponsored a three-day Accelerated Construction Technology Transfer workshop that focused on Project NEON. Local and national experts in highway planning, design, and construction developed potential strategies for Project NEON. In response to feedback at the workshop, the project team studied additional concepts and design modifications. Alternatives E and F were developed as a result. Like Alternative D, they included arterial improvements in addition to I-15 improvements.

Alternative E is almost identical to Alternative D. The only difference is that under Alternative E, I-15 would be shifted about 80 feet east to avoid major drainage channels along Rancho Drive. Residential and business displacements under Alternative E would be comparable to Alternatives G and H.

Alternative F would provide four to six general purpose lanes on northbound I-15 traffic and five to six through lanes on southbound I-15. A northbound C-D road would begin south of Sahara Avenue and handle traffic going to all local exits, including Sahara Avenue, Charleston Boulevard, the new exit to Alta Drive/Bonneville Avenue and Martin Luther King Boulevard. The northbound C-D road would carry traffic entering I-15 from Sahara Avenue and Charleston Boulevard to either northbound I-15 or the ramps to US 95. Mainline I-15 would accommodate only through travel on I-15 and connections to northbound and southbound US 95.

Unlike Alternatives D and E, a C-D road would also be provided along southbound I-15 under Alternative F. The southbound C-D road would carry traffic destined to Charleston Boulevard and Sahara Avenue, and traffic entering from Martin Luther King Boulevard near US 95 and the Alta Drive southbound entrance (via Martin Luther King Boulevard). Residential and business displacements under Alternative F would be comparable to Alternatives G and H.

Alternative D was dropped from consideration in favor of Alternative E because Alternative E would be easier to construct, and because Alternative E would provide a greater opportunity to sell and redevelop land acquired as part of the project. Alternatives E and F were eventually dropped from consideration in favor of Alternatives E-HOV and F-HOV described below.

In 2006, NDOT began a regionwide evaluation of the potential role of HOV lanes in meeting the future transportation needs of southern Nevada. In 2007, NDOT approved a regional HOV plan that is now part of the Regional Transportation Commission of Southern Nevada's (RTC's)

regional transportation plan. The plan envisioned a continuous HOV system through the Resort Corridor on US 95 and I-15 with direct connecting ramps between the two highways. This concept became the basis for two new alternatives, referred to as Alternatives E-HOV and F-HOV (see *Amended Alternatives Design Report Alternatives E & F HOV* on the CD at the back of the FEIS). These alternatives are similar to the eliminated Alternatives E and F, but they have two HOV lanes in each direction.

Alternative E-HOV would provide four to five through lanes, two HOV lanes, and auxiliary lanes for northbound I-15 traffic and four to five through lanes, two HOV lanes, and auxiliary lanes for southbound I-15 traffic. The I-15 HOV lanes would connect to US 95 to/from the west. There would be an access point to and from the HOV lanes at Oakey Boulevard/Wyoming Avenue. Other aspects of this alternative are the same as those for Alternative E. Roughly 350 residences and 445 businesses would be displaced under Alternative E-HOV.

Alternative F-HOV would provide three to five through lanes and two HOV lanes for northbound I-15 traffic, and four to five through lanes and two HOV lanes for southbound I-15 traffic. The I-15 HOV lanes would connect to US 95 to/from the west. There would be an access point to and from the HOV lanes at Oakey Boulevard/Wyoming Avenue. Other aspects of this alternative are the same as those for Alternative F. Roughly 350 residences and 456 businesses would be displaced under Alternative F-HOV.

Project NEON's scope, complexity, and overall cost dictate that it be built in phases. NDOT worked with project stakeholders and design teams in 2008 and 2009 to develop a conceptual design refinement study that identified phases that are fundable, implementable, and operationally independent. See the *Conceptual Design Refinement Study* (CH2M HILL 2009) on the CD at the back of the FEIS. The goal was to retain the basic concept of Alternatives E-HOV and F-HOV and to achieve the following objectives:

- Phase the overall project so that each phase can be built and function as a feasible improvement.
- Keep the project phases consistent with the funding identified in the regional transportation plan.
- Reduce right-of-way costs compared to those for Alternatives E-HOV and F-HOV.

As a result of the conceptual design refinement study, NDOT developed Alternatives G and H. Alternative G is a revised version of Alternative E-HOV and Alternative H a revised version of Alternative F-HOV. They could be implemented in phases that could provide operational and safety benefits, to a greater extent than Alternatives E-HOV and F-HOV. Based on the design refinement study, Alternatives E-HOV and F-HOV were dropped from consideration in 2009, because Alternatives G and H would provide the same operational characteristics with fewer residential relocations and each phase would function as a feasible improvement.

2.3 Alternatives Retained for Detailed Study

The reasonable range of alternatives discussed in detail in the DEIS and FEIS included the No-Build Alternative and Alternatives G and H. The No-Build Alternative would take no action to address the existing deficiencies and safety problems identified within the study limits. Traffic flow on the I-15 mainline, ramps, and interchanges would continue to deteriorate. Because the

No-Build Alternative would not meet the project's purpose and need it was eliminated from consideration.

Alternatives G and H would meet the purpose of and need for the project, and they would be consistent with the regional transportation plan and NDOT's HOV plan for southern Nevada. RTC supports the HOV element of Alternatives G and H for providing improved regional transit access to Las Vegas' Resort Corridor. The HOV elements of Project NEON would complement the investment that RTC is making in the Downtown Connector busway and transit service enhancements in the Resort Corridor. RTC plans to develop express transit routes in the I-15 HOV lanes as they are constructed. Alternatives G and H are described below.

Alternative G would provide four to five through lanes (depending on the location), two HOV lanes and auxiliary lanes for northbound I-15 traffic, and also four to five through lanes, two HOV lanes, and auxiliary lanes for southbound I-15 traffic. A direct connector ramp would enhance the connection from northbound I-15 to northbound US 95. A similar ramp would enhance the connection between southbound US 95 and southbound I-15. South of Oakey Boulevard, Alternative G would shift the freeway centerline to the east, minimizing impacts to existing drainage facilities. Alternative G also includes:

- The Martin Luther King Boulevard/Industrial Road connector, which includes grade separating Oakey Boulevard and Wyoming Avenue over the Union Pacific Railroad and Industrial Road.
- Reconstructing the Charleston Boulevard interchange (including improvements to Grand Central Parkway) and constructing a half-diamond interchange at Alta Drive.

Alternative G would displace 339 residences and 445 businesses and cost between \$1.4 billion and \$1.8 billion to complete.

Alternative H shares many of the features of Alternative G. A key difference is that Alternative H would have a northbound C-D road that would diverge from I-15 at Sahara Avenue and tie back into I-15 near US 95. The C-D road would act as a frontage road for the freeway, allowing vehicles entering or exiting I-15 at Sahara Avenue, Charleston Boulevard, or Alta Drive to do so without weaving across through traffic on I-15. (Under Alternative G the direct connector would facilitate entering and exiting traffic at Sahara Avenue and Alta Drive, but it would connect to US 95 only rather than connecting back to I-15.) At the north end of the C-D road a connection to US 95 northbound and southbound would be provided before the C-D road ties back into I-15.

A similar C-D road arrangement would be provided along southbound I-15. The southbound C-D road would carry traffic destined to Charleston Boulevard and Sahara Avenue. The southbound C-D road would also carry traffic entering I-15 southbound from US 95, Martin Luther King Boulevard near US 95, and southbound Martin Luther King Boulevard between Alta Drive and Charleston Boulevard.

Alternative H includes the Charleston Boulevard interchange reconstruction, the Alta Drive half interchange, the Martin Luther King Boulevard/Industrial Road connector over I-15, and the Oakey Boulevard/Wyoming Avenue railroad overpass. These components are the same as those described for Alternative G.

Alternative H would displace 339 residences and 456 businesses and cost between \$1.5 billion and \$1.9 billion to complete.

2.3.1 Alternatives G and H Comparison

Despite the similarities between Alternatives G and H, Alternative H was eliminated from further consideration. The following factors were evaluated to determine the advantages and disadvantages between Alternatives G and H:

- Traffic capacity;
- Traffic operations;
- Traffic safety;
- System linkage;
- Constructability;
- Environmental considerations; and
- Capital cost.

Each factor is discussed below.

Capacity

Alternatives G and H have similar overall level of service (LOS) in the design year (FEIS Appendix C, *Project NEON Level of Service Analysis*, Tables 7-9) indicating that the two build alternatives would provide roughly equivalent traffic and people-carrying capacity.

Operations

Both Alternatives G and H address the weaving and local road conflicts that exist in the study area today. In regards to anticipated operating speeds, analysis indicates that Alternative G provides higher operating speeds in the design year (FEIS Appendix C, Tables 7 and 8). This is true for all the AM and PM peak periods, but most notable in the PM peak for northbound traffic. The analysis shows that mainline I-15 speeds under Alternative G average 58.1 mph, whereas speeds under Alternative H average 54.1 mph.

Alternative G also provides a roadway configuration that is simple and familiar to most drivers, resulting in improved traffic operations. The C-D road system of Alternative H is less familiar and not what drivers expect to encounter. Alternative H requires northbound drivers to make a critical lane choice decision where they have to exit earlier than expected to access the Charleston Boulevard and Alta Drive exits on the C-D road. Missing the exit for the C-D road would create out-of-distance travel. With a large number of drivers not from the Las Vegas area using I-15, this would increase VMT in the study area as a result of non-local drivers not expecting to exit at the C-D road to access the Charleston Boulevard and Alta Drive exits. Trucks use the Charleston Boulevard and Alta Drive exits for the delivery of goods to the area. Alternative H would create greater operational difficulties for large trucks. As a result of these issues, Alternative G provides the best traffic operations of the two build alternatives.

Safety

Crashes in the corridor are primarily related to the congestion that causes stop-and-go traffic which results in a high percentage of rear end collisions. Because Alternative G is superior to Alternative H in terms of improving speeds and traffic flow, it has a corresponding improvement in the crash rate.

Safety for pedestrians and bicyclists will also be improved with both Alternatives G and H as a result of the connection of Industrial and Martin Luther King Boulevard, updating arterials to latest design standards (which contain improved pedestrian and bicyclist standards as well as Americans with Disabilities Act compliance), and improvements to intersection traffic operations.

System Linkage

Both Alternatives G and H improve the system linkage by providing the needed connection between the express lanes to the south and the existing HOV lanes on US 95 to the north. This would facilitate the advancement of the system of HOV lanes, bus rapid transit, and supporting park-and-ride facilities.

Constructability

In a comparison of the build alternatives, the Martin Luther King Boulevard/Industrial Connector near Charleston Boulevard and the freeway just south of the Spaghetti Bowl provide differentiation between the two build alternatives regarding constructability issues. Staging the Martin Luther King Boulevard/Industrial Connector is more difficult for Alternative H because of the location of the C-D road connection requiring a connection on structure. Similarly, braiding (one ramp elevated over another ramp) at the Spaghetti Bowl will be much more complicated to construct in stages for Alternative H than Alternative G. With Alternative H, the realignment of the southbound US 95 to southbound I-15 ramp could result in that ramp being closed for several months to complete the tie-in, which would disrupt traffic on the high volume system ramp. As a result, the constructability of Alternative G is better than that of Alternative H.

Environmental Considerations

Alternative G requires 22 fewer acres of right-of-way and would displace 11 fewer commercial establishments than Alternative H. Both build alternatives would displace the same number of residences and affect the same number of historic sites. Alternative G affects two more sensitive noise receptors than Alternative H.

Capital Cost

Preliminary comparative cost estimates indicate that Alternative G costs roughly \$100 million less than Alternative H.

3. Environmentally Preferred Alternative

The Council on Environmental Quality regulations for implementing NEPA require that the Record of Decision specify “the alternative or alternatives which were considered to be environmentally preferable” (40 CFR §1505.2[b]). As noted in this document and in the FEIS, screening decisions that resulted in the FEIS preferred alternative (now the Selected Alternative) were made based on minimizing impacts to the built and natural environment. The Selected Alternative is preferred from an environmental standpoint, though the differences between the two alternatives are not great. Table 1 summarizes the environmental and socioeconomic impacts of the Selected Alternative.

TABLE 1
Impact Summary

Resource	Alternative G (Selected Alternative)	Alternative H
Project length	3.7 miles	3.7 miles
Total cost ^{a, b}	\$1.4 billion to \$1.8 billion	\$1.5 billion to \$1.9 billion
New right of way required (acres)	93	115
Residential displacements	339	339
Commercial displacements	445	456
Parking spaces removed	1,520	1,810
Public building displacements	0	0
Historic sites affected	23	23
Archaeological sites affected	0	0
Noise receptors affected ^c	32	34
Potential contaminated sites	1	1
Water quality	Increase in stormwater flow resulting from the increased impervious surface area could increase the highway pollutant loading (e.g., sediment, nutrients, heavy metals) into drainages.	Increase in stormwater flow resulting from the increased impervious surface area could increase the highway pollutant loading (e.g., sediment, nutrients, heavy metals) into drainages.
100-year floodplain	0 acres	0 acres
Major utilities affected	7,800 feet of overhead and underground electrical transmission lines; 4,000 feet of the 36-inch water line under Oakey/Wyoming Avenue	8,200 feet of overhead and underground electrical transmission lines; 4,000 feet of the 36-inch water line under Oakey/Wyoming Avenue

^a The cost estimate for Project NEON is consistent with federal, state and local funding identified in RTC's regional transportation program (RTP) and transportation improvement program (TIP).

^b The costs have been calculated to include years 2010 to 2030.

^c Number of noise receptors included in the noise analysis model that approached or exceeded the noise abatement criterion of 67 dBA.

4. Description of the Selected Alternative

The Selected Alternative is Alternative G. Under Alternative G, I-15 will be reconstructed to provide HOV lanes and auxiliary lanes in addition to four to five general purpose or through lanes. It includes the Charleston Boulevard/I-15 interchange reconstruction, Alta Drive half interchange with I-15, Martin Luther King/Industrial Road connector over I-15, and the Oakey Boulevard/Wyoming Avenue railroad overpass. The Selected Alternative and its component features discussed below are shown in Exhibit 2. In addition, the TSM measures already in place along I-15, such as ramp metering, traffic cameras, dynamic message signs, freeway service

patrol vehicles, and an incident management program, will be part of the Selected Alternative. The “build” components of the Selected Alternative are discussed below.

Roughly 339 residences and 445 businesses will be relocated under Alternative G. Alternative G will shift the freeway centerline to the east, minimizing impacts to drainage facilities. Adding general purpose lanes, auxiliary lanes, and the direct connector to or from US 95 will increase the capacity of I-15 to accommodate future traffic volumes with an acceptable level of service.

4.1 Through Lanes

From Sahara Avenue, I-15 northbound will transition from a four-lane freeway to a five-lane freeway. A two-lane exit ramp will be provided at Sahara Avenue. Between Sahara Avenue and Oakey Boulevard, five-lane northbound I-15 will split into two three-lane roadways: three lanes on the left will carry through traffic continuing on I-15 north of the Spaghetti Bowl and US 95/I-515 south, and three on the right will become a direct connector to northbound US 95.

North of the exit to southbound US 95, I-15 will be a three-lane freeway, just as it is today. Exhibit 2d illustrates how the I-15 through lanes and the US 95 connector are separated.

Southbound I-15 will transition from a three-lane to a four-lane freeway plus an auxiliary lane at the US 95 interchange. The auxiliary lane will be part of a two-lane exit ramp to Charleston Boulevard. Southbound I-15 will have four lanes plus an auxiliary lane between the point where the southbound direct connector and southbound I-15 join and the exit to Spring Mountain Road exit. The entrance ramp from Sahara Avenue will add a fifth lane to I-15 before it transitions back to match up with the I-15 alignment south of the Project NEON limits. Given the long-term nature of Project NEON, the improvements south of Sahara Avenue likely will tie into a project in the approved 2009–2030 Regional Transportation Plan (project 4144), which calls for widening I-15 to 14 lanes, including two HOV lanes in each direction. If the project is not constructed before the I-15 improvements near Sahara Avenue, Project NEON will transition back into the existing configuration of I-15 south of Sahara Avenue.

4.2 HOV Lanes

Two HOV lanes in each direction will be provided in the I-15 median. The HOV lanes will be for buses, motorcycles, and cars with one or more passengers. HOV lanes will be separated from through lanes by a 2- to 4-foot buffer. The HOV lanes will tie into the express lanes at Sahara Avenue and the US 95 HOV lanes at Rancho Drive. At the Spaghetti Bowl, the HOV lanes will leave the I-15 median and connect to US 95. The HOV lanes will be in the US 95 median between the Spaghetti Bowl and Rancho Drive.

The HOV lanes will be accessible to and from local streets at a point 1,000 feet north of Oakey Boulevard from ramps that will drop down from the I-15 HOV lanes to street level. A new local street connection from the HOV ramps to Western Avenue, east of I-15, will be constructed. Western Avenue will connect to Oakey Boulevard on the south and Charleston Boulevard/Grand Central Parkway on the north. To accommodate the local street connections, Wall Street – a through street under I-15 between Martin Luther King Boulevard and Western Avenue – will be closed. HOV lanes will address capacity issues as well as multimodal considerations. Providing HOV lanes makes the I-15 improvements compatible with the NDOT regional HOV plan, which has been incorporated into the regional transportation plan.

4.3 I-15 / US 95 Direct Connector

The US 95 direct connector is a three-lane roadway that begins north of Sahara Avenue. It is intended to serve traffic destined for US 95 northbound and traffic destined for the Alta Drive half interchange. The northbound I-15 connector to northbound US 95 will have an exit to Alta Drive. The Sahara Avenue entrance ramp will have a connection to the northbound US 95 connector, as will the Charleston Boulevard entrance. At the I-15/US 95 interchange the US 95 connector will tie into the ramp carrying northbound I-15 to US 95, including the existing exit to Martin Luther King Boulevard.

A similar direct connector will be built from southbound US 95 to southbound I-15. The connector will have an exit to Charleston Boulevard. An entrance ramp from Martin Luther King Boulevard/Alta Drive will join the southbound connector ramp near Bearden Drive. An exit ramp to Sahara Avenue will diverge from the connector just south of Charleston Boulevard. The southbound connector will merge with southbound I-15 just north of Sahara Avenue. The direct connector will address short weave issues.

4.4 Entrance / Exit Ramps

Entrance and exit ramps on I-15 will be spaced far enough apart to reduce weaving, and an auxiliary lane will be provided along I-15 between where an entrance ramp joins the freeway and the next exit ramp leaves the freeway. In areas where it is not possible to provide enough spacing between entrance and exit ramps the ramps will be braided so that one is built over the other. The Charleston Boulevard and Sahara Avenue ramps will be braided, as will the southbound entrance from Sahara Avenue and the southbound exit to Spring Mountain Road. Other than lengthening and braiding the entrance and exit ramps, the Sahara Avenue interchange will remain in the same configuration it is today.

A two-lane exit ramp to Charleston Boulevard will diverge from northbound I-15. A two-lane entrance ramp from Sahara Avenue will enter northbound I-15 just north of Charleston Boulevard, and a two-lane entrance ramp from Charleston Boulevard will enter northbound I-15 near Alta Drive. An auxiliary lane will be provided between the Sahara Avenue entrance ramp and the exit to southbound US 95. A second auxiliary lane will be provided between the Charleston Boulevard entrance and US 95.

The auxiliary lanes, longer entrance and exit ramps, and braided ramps will address short merge/weave issues.

4.5 Charleston Boulevard Interchange Reconstruction

The I-15/Charleston Boulevard interchange will be reconstructed as a “tight-diamond” interchange (Exhibit 3). Related to the Charleston Boulevard interchange reconstruction, Grand Central Parkway will be reconstructed to elevate it over Charleston Boulevard and connect it to Western Avenue. Western Avenue ends in a cul-du-sac just south of Charleston Boulevard today. The Grand Central Parkway/Western Avenue overpass will connect to Charleston Boulevard from two ramps: one north of Charleston Boulevard to connect westbound Charleston Boulevard to the overpass, and one south of Charleston Boulevard to connect eastbound Charleston Boulevard to the overpass. The Grand Central Parkway/Charleston Boulevard intersection will allow only right-turn connections to/from Western Avenue and Grand Central Parkway, eliminating left-turn movements across Charleston Boulevard and improving intersection operations and safety. Traffic entering I-15 northbound at Charleston

Boulevard could access either I-15 northbound or the connector to US 95 northbound. Likewise, traffic on I-15 southbound and US 95 southbound could exit to Charleston Boulevard.

Improving the unique and indirect ramp connections at the I-15/Charleston Boulevard interchange and eliminating the at-grade Charleston Boulevard/Grand Central Parkway intersection (roughly 340 feet from the interchange) will improve the interchange's capacity and traffic operations, thus helping to improve traffic flow on I-15. As an example, traffic exiting I-15 northbound to Charleston Boulevard could turn right onto Charleston Boulevard and then make another right to reach Grand Central Parkway, rather than weaving across Charleston Boulevard in a very short distance to make a left-hand turn onto Grand Central Parkway as is done today.

A grade-separated intersection of Charleston Boulevard and Grand Central Parkway will eliminate pedestrians and bicyclists that travel north and south on Grand Central Parkway/Western Avenue from having to cross the very busy Charleston Boulevard, further enhancing accommodations, accessibility, and safety. The outside lane on Charleston Boulevard will be 14 feet wide to accommodate bicyclists.

4.6 Alta Drive Half Interchange

A half interchange will be built at Alta Drive/Bonneville Avenue, providing a connection from northbound I-15 and to southbound I-15.¹ Alta Drive/Bonneville Avenue will be reconstructed from Shadow Lane on the west to Grand Central Parkway on the east (Exhibit 4). The outside lane on Alta Drive/Bonneville Avenue will be 14 feet wide to accommodate bicyclists. The northbound exit from I-15 will connect directly to Alta Drive/Bonneville Avenue. The southbound entrance to I-15 will be from Martin Luther King Boulevard, about 300 feet south of Alta Drive. The Alta Drive half interchange will provide access to existing and planned development adjacent to Grand Central Parkway, diverting traffic from the Charleston Boulevard interchange with I-15 thereby improving the interchange's operations. The southbound entrance to I-15 from Martin Luther King Boulevard will replace the I-15 entrance from Martin Luther King Boulevard just south of Charleston Boulevard. The new northbound exit to Alta Drive/Bonneville Avenue will provide the complementary movement, per AASHTO interstate design guidance (2005).

4.7 Martin Luther King Boulevard / Industrial Road Connector

A new four-lane arterial will connect Martin Luther King Boulevard (west of I-15) to Industrial Road (east of I-15). The connector will be on a bridge from near the Industrial Road terminus (north of Utah Avenue) over the Union Pacific Railroad, over Charleston Boulevard, over I-15 and then returning to ground level west of I-15, south of Alta Drive (Exhibit 5). The connector initially will be constructed as a four-lane arterial, but it may be widened to six lanes as volume warrants. Martin Luther King Boulevard will be reconstructed just west of its existing alignment from Bearden Drive to Alta Drive. The Martin Luther King/Alta Drive intersection will be reconstructed. Bearden Drive will intersect Martin Luther King Boulevard and be reconstructed from Martin Luther King Boulevard west to Shadow Lane. A roundabout will be constructed at the Bearden Drive/Shadow Lane intersection. Existing Martin Luther King Boulevard will be

¹ An interchange with only two diagonal ramps, one entrance, and one exit in adjacent quadrants. It serves traffic to and from one direction along the freeway, but ignores the other.

removed from Alta Drive south to Las Vegas Fire Station No. 10, just north of Oakey Boulevard. Martin Luther King Boulevard will be reconstructed as a two-lane roadway between Oakey Boulevard and the fire station to provide access to the fire station.

It should be noted that the Martin Luther King Boulevard/Industrial Road Connector was part of the US 95 Record of Decision (ROD) (2000); however, the concept was notably different. In the US 95 document, the connector included widening Industrial Road to six lanes from Sahara Avenue to Wyoming Avenue, which would have remained at grade. The connector was not constructed under the US 95 ROD because it became apparent in the early stages of Project NEON that the design would be substantially altered by the interstate and local arterial improvements now proposed. The inclusion of the revised Martin Luther King/Industrial Connector in Project NEON is intended to satisfy and improve on the requirements of the US 95 ROD.

The Martin Luther King Boulevard/Industrial Road connector will divert local trips from I-15 by providing an efficient north-south arterial connection across I-15. This will allow those traveling on Martin Luther King Boulevard to directly access Industrial Road without having to use I-15 between Charleston Boulevard and Sahara Avenue. This connection will allow safer and more direct access to jobs along Industrial Road and on Las Vegas Boulevard. It will also divert trips from Charleston Boulevard near the I-15/Charleston Boulevard interchange. The Martin Luther King Boulevard/Industrial Road connector will have five-foot sidewalks.

4.8 Oakey Boulevard / Wyoming Avenue Railroad Overpass

Oakey Boulevard/Wyoming Avenue will be reconstructed between Commerce Street on the east and I-15 on the west to provide four travel lanes (same as today) and an overpass over the Union Pacific Railroad tracks east of I-15 (Exhibit 6). Roughly 25 trains cross Wyoming Avenue every day. Wyoming Avenue will be realigned about 50 feet to the south and cross over both Industrial Road and the railroad tracks before intersecting Western Avenue. A connector road will be built to provide a connection between Wyoming Avenue and Industrial Road.

The Oakey Boulevard/Wyoming Avenue overpass will reduce short trips on I-15 that avoid Oakey Boulevard/Wyoming Avenue because of the at-grade railroad crossing. It will also make the Martin Luther King Boulevard/Industrial Road connector operate at an acceptable LOS by eliminating the at-grade intersection of Wyoming Avenue and Industrial Road. The Wyoming Avenue/Industrial Road intersection will operate at LOS F in 2030 if the Oakey Boulevard/Wyoming Avenue overpass is not built.

The Oakey Boulevard/Wyoming Avenue overpass will provide a more efficient east-west connection across I-15, reducing traffic that travels on Charleston Boulevard through the I-15/Charleston Boulevard interchange and replacing the Wall Street connection under I-15, which will be closed under Alternative G. Five-foot bike lanes will be provided on Oakey Boulevard/Wyoming Avenue in the project area. It will also provide a more efficient east-west connection and eliminate the at-grade railroad crossing for bicyclists and pedestrians and reduce the opportunity for trespassing on the tracks.

4.9 Project Phasing

Project NEON will be constructed in phases. Phase 1 would provide a connection from the I-15 Express Lane project, which terminates near Sahara Avenue, to the recently constructed US 95

HOV lanes that terminate near Rancho Drive. In addition, the Phase 1 improvements would include the following:

- HOV connection to a new local street between Oakey Boulevard and Charleston Boulevard; and
- New connection of Grand Central Parkway and Western Avenue featuring a Grand Central Parkway overpass over Charleston Boulevard and providing a connection by new ramps from Grand Central Parkway to Charleston.

Phase 2 provides for the reconstruction of local arterials including Alta Drive and the Martin Luther King Boulevard/Industrial Road connection.

Phase 3 would consist of reconstructing I-15 north of Oakey Boulevard and reconstructing the Charleston Boulevard interchange into a tight-diamond configuration. Phase 4 would consist of the southbound direct connector and Phase 5 would consist of I-15 south of Oakey Boulevard and the northbound direct connector. The order for constructing Phases 2 through 5 is flexible and subject to available funding.

Upon completion of the Record of Decision, Phase 1 right of way acquisition could begin as early as 2012 and construction of the I-15 HOV lanes, HOV connections to local streets, and new connection of Grand Central Parkway and Western Avenue could be completed in 2016. Each of the four remaining phases would begin approximately 3 years after the start of the preceding phase and be completed approximately 3 to 5 years after the completion of the preceding phase. Funding availability and right of way costs will significantly influence the timing and longevity of each project phase.

5. Section 4(f)

The U.S. Department of Transportation's Section 4(f) law (49 USC 303) states that federal funds may not be approved for projects that use land from a significant publicly owned park, recreation area, wildlife or waterfowl refuge, or significant historic site unless it is determined that there is no feasible and prudent alternative to the use of land from such properties, and the action includes all possible planning to minimize harm to the property resulting from such use.

5.1 Section 4(f) Properties

The National Park Service and Bureau of Land Management administer the Old Spanish National Historic Trail that is within the project area. In their comments on the DEIS, the Department of the Interior indicated that all the land adjacent to I-5 has been totally disturbed and, therefore, the Department believes there will not be any adverse impacts to the trail due to Project NEON.

A survey of the project's area of potential effect (APE) identified 359 properties that qualify as potentially historic. Of those, 99 are eligible for inclusion on the National Register of Historic Places (NRHP). The Selected Alternative will require full take and demolition of 23 NRHP-eligible properties. The only Section 4(f) resources the Selected Alternative will affect are historic properties. All 23 properties are eligible under Criterion A (property associated with events that have made a significant contribution to the broad patterns of our history), and 22 of them are eligible under Criterion C (property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic

values, or represents a significant and distinguishable entity whose components lack individual distinction). Section 4 of the FEIS contains a description of the eligible properties.

5.2 Section 4(f) Summary

5.2.1 No Prudent and Feasible Alternatives

The 23 historic structures that will be adversely affected by the Selected Alternative are located immediately on the west side of I-15. As described in Chapter 2 of the FEIS, alternatives were developed to minimize right-of-way impacts. However, none of the build alternatives that would meet the purpose and need of the project, including those eliminated from further consideration would avoid use of the Section 4(f) properties identified. Only the No-Build Alternative would avoid the properties. However, the No-Build Alternative, Transportation System Management Alternative, and Transportation Demand Alternative would each fail to address the inadequate capacity and operational deficiencies on I-15 or provide an HOV lane connection to US 95; therefore they would not meet the purpose and need of the project. As a result, there are no prudent and feasible alternatives to the Selected Alternative, as documented in the Final Section 4(f) Evaluation in the FEIS.

5.2.2 Least Harm Analysis

If there is no feasible and prudent avoidance alternative (and a finding of de minimis impact has not been made 23 CFR 774.3(b); 774.17), FHWA may approve the project only if it “includes all possible planning, as defined in 23 CFR 774.17, to minimize harm to the property resulting from such use.” The regulation states that, if there is no feasible and prudent avoidance alternative, the agency “may approve only the alternative that causes the least overall harm in light of the statute's preservation purpose.” “Least overall harm” is determined by balancing the following list of factors:

- The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);
- The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
- The relative significance of each Section 4(f) property;
- The views of officials with jurisdiction over each Section 4(f) property;
- The degree to which each alternative meets the purpose and need for the project;
- After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
- Substantial differences in costs among the alternatives.

Alternatives G (the Selected Alternative) and H (reasonable alternative in the FEIS) would affect the same historic properties in the same manner. Their ability to mitigate adverse impacts to each Section 4(f) property is also the same. Alternatives G and H are equally able to meet the project purpose and need. Concerning the last two bullets above, there are minor differences between the residential and business displacements of Alternatives G and H, with Alternative H having a greater impact in both cases. After mitigation, however, there would be no discernable differences in the magnitude of the two alternatives’ residential and business impacts. As noted, Alternative H

would be more expensive than Alternative G, but the difference would not be “substantial” given the overall cost.

5.2.3 Planning to Minimize Harm

Because impact to the 23 historic structures cannot be avoided or minimized, mitigation measures have been developed by the Nevada State Historic Preservation Office (SHPO), FHWA, and NDOT. FHWA and NDOT have proposed the following measures to resolve the adverse effects on historic properties resulting from the Selected Alternative.

Documentation

NDOT will record the eligible properties to be affected by the project with 35mm black and white photography. To mitigate for the demolition of the entire Buena Vista Historic District and part of the Glen Heather Estates neighborhood, NDOT’s Location Division will use Light Detection and Range (LiDAR) scanners to record the neighborhoods (see Section 3.13.6, Cultural Resources, regarding LiDAR). All houses in the Buena Vista Historic District will be scanned. The houses on the northeast and southwest sides of Loch Lomond Street in the Glen Heather Estates neighborhood will also be scanned. NDOT’s Location Division will develop three-dimensional digital “fly-throughs” of the Buena Vista Historic District and Loch Lomond Street in the Glen Heather Estates neighborhood. The data will either be maintained by NDOT or provided to SHPO.

Salvage

Before demolition, the Buena Vista homes on Desert Lane, Martin Luther King Boulevard, and Hastings Avenue and the Glen Heather Estates homes on Loch Lomond Way will be opened for salvage. NDOT will advertise the salvage nationally to attract the largest number of people, and thus reuse as much of the historic building material as possible.

Salvage activities will be allowed according to federal and state regulations governing asbestos containing materials, which may prohibit salvaging materials.

Redevelopment

Only part of each lot on the east side of Loch Lomond Way will be needed for highway widening. NDOT may sell the remaining land for re-development. If the remaining land is sold, NDOT will desire that the land is used in a way that is compatible with the surrounding neighborhood.

NDOT will explore methods for encouraging that new construction in Glen Heather Estates is compatible with the historic feeling of the neighborhood, but may not have the legal authority to require developers to abide by its recommended architectural design guidelines. However, the City of Las Vegas, a cooperating agency on Project NEON, may be able to use the provisions of Assembly Bill 340 (passed in June 2009) to require that new construction be compatible with Glen Heather Estates' historic feeling. Among other things, Assembly Bill 340 expanded Las Vegas' ability to maintain the character of historic neighborhoods.

Coordination

Coordination with the SHPO by letter dated June 3, 2008, supports NDOT and FHWA’s definition of the direct APE and the visual (indirect) APE. The SHPO has concurred with the findings of NRHP eligibility and the findings of adverse effect (for 23 NRHP properties) and no adverse effect (for 13 additional NRHP properties) by letter (see Appendix A of the FEIS). Consultation with the Moapa, Las Vegas Paiute, and Pahrump Paiute resulted in no

outstanding concerns from the tribes. The Native American Consultation Report documenting the tribal consultations for Project NEON was completed June 7, 2006.

No comments on the Draft or Final Section 4(f) Evaluations were received during the public comment periods.

5.2.4 Section 4(f) Conclusion

Based on the considerations discussed above and in the FEIS, there is no feasible and prudent alternative to displacing the 23 historic structures. The Programmatic Agreement signed by SHPO, FHWA, and NDOT on September 2, 2010, specifies the process FHWA and NDOT will follow to avoid, lessen, or mitigate the adverse effects each phase of the project will have on properties that are eligible for inclusion in, or included in the NRHP. A copy of the signed Programmatic Agreement is found in Appendix A. The Selected Alternative includes all possible planning to minimize harm to the 23 historic buildings resulting from their proposed removal.

6. Measures to Minimize Harm

Impacts of the Selected Alternative have been evaluated and minimized to the extent practicable. Mitigation proposed for the impacts are summarized below and fully described in Section 3.17 of the FEIS. The mitigation measures will be implemented either before or concurrently with each phase of the project's proposed construction activities.

6.1 Traffic Management

The contractor and NDOT will coordinate with the City, RTC, and local emergency service providers in developing detour plans, including the maintenance of transit service and of pedestrian circulation compliant with the Americans with Disabilities Act. Emergency service providers, and RTC will be given advance notice of road and sidewalk closures and detour routes.

Temporary closure of parts of I-15 and adjacent arterials for overhead construction or demolition will exempt emergency vehicles.

The contractor will maintain local access and circulation to neighborhoods and businesses during construction for pedestrians and motorists.

Construction of the Selected Alternative is not expected to compromise transit service. A bus stop on the south side of Alta Drive near I-15 may be relocated. To mitigate the effects of temporary service changes, an extensive and coordinated public information program will be developed by NDOT in coordination with RTC as the Selected Alternative moves through final design and into construction. Ongoing coordination with RTC will minimize disruptions to transit and maintain existing bus stops.

6.2 Utilities

Prior rights and franchise agreements with the City, County, and NDOT will dictate whether utility companies are responsible in full or in part for the cost of the physical relocation and easements.

6.3 Property Acquisition

In the process of acquiring the real estate that NDOT requires to construct Project NEON, there will be a planning or preparation phase followed by the actual acquisition process. NDOT will implement mitigation measures in each phase. A description of the mitigation measures in each phase is found below.

6.3.1 Planning/Preparation Phase

Prior to beginning real estate negotiations with members of the environmental justice community that Project NEON will affect, NDOT will perform a number of outreach activities designed to deepen their understanding of the project's potential impacts to community cohesion and relocation needs beyond obtaining a new residence. To obtain this information, NDOT will meet with the City of Las Vegas Neighborhood Services Department, the City Council member representing the ward where the environmental justice relocations reside, church leaders, and the Latin Chamber of Commerce.

NDOT will also coordinate with the Department of Housing and Urban Development (HUD), the Southern Nevada Regional Housing Authority (SNRHA), and the Nevada State Housing Division (NSHD) to ensure that families relocated by Project NEON have information about the widest range of housing opportunities and other programs that HUD, SNRHA, and NSHD offer to qualifying families during the project's real estate phases. As part of the coordination with the housing agencies, NDOT commits to:

- Conduct training workshops for their relocation staff to familiarize them with the housing options and programs that are available through HUD, SNRHA, and NSHD;
- Conduct a housing fair during each real estate phase, in cooperation with HUD, SNRHA, and NSHD to allow affected residents to learn about housing options beyond the private market and related programs that may facilitate the transition to a new residence. Translators will be provided as needed at these fairs; and
- Conduct an annual meeting with HUD, SNRHA, and NSHD to provide them updated information on the status of Project NEON real estate issues and to obtain from the housing agencies an update on the quantity of subsidized housing units in the Las Vegas Valley.

Additionally, NDOT has committed to updating the *Project NEON Relocation Study* after this Record of Decision is completed and right of way is set. If available, 2010 Census data will be used for the updated study.

6.3.2 Acquisition Phase

Federal property acquisition law provides for a payment of just compensation for properties displaced for a federally funded transportation project (Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended [Uniform Act]). Acquisition price, replacement dwelling costs, moving expenses, increased rental or mortgage payments, closing costs, and other relocation costs are covered for residential displacements. The Uniform Act establishes uniform and equitable procedures for land acquisition and provides for uniform and equitable treatment of persons relocated from their homes by federally assisted programs.

The NDOT Right-of-Way Division, under the provisions of the Uniform Act, will ensure that property owners who are affected directly receive fair market value for the acquired right-of-

way. It is NDOT policy that persons relocated as a result of highway programs receive fair and humane treatment and not suffer unnecessarily as a result of programs designed for the benefit of the public. Legally permitted property access will be perpetuated in the after-condition. A full inventory of available housing will be conducted and identified by the NDOT Right-of-Way Division at the time of final appraisal and acquisition of right-of-way. NDOT will ensure the following:

- All affected property owners and renters will be interviewed during the real estate acquisition phase;
- No person in legal occupancy of properties within the project area will be required to vacate in less than 90 days, unless vacancy is required for safety or health reasons;
- No pre-acquisition residential occupant will be required to relocate until comparable decent, safe, and sanitary replacement housing has been made available;
- No post-acquisition occupants qualifying as low income will be required to relocate until adequate decent, safe, and sanitary housing has been made available within their financial means;
- Before relocation, comparable or adequate replacement dwellings will be made available or provided for each eligible relocated person; such availability or provision will be accompanied by an analysis of the relocation problems involved and a specific plan for their resolution;
- No nonresidential displacees will be required to vacate without assistance in assessing their specific relocation needs or locating potential replacement properties;
- All manner of notices required by the controlling laws will be provided to all persons relocated by Project NEON;
- Relocation payments will be in the amounts required by law for successful relocations; and
- Relocation procedures will be realistic and adequate to provide orderly, timely, and efficient relocation of relocated persons.

NDOT will maintain local access and circulation to neighborhoods, businesses, and area public services during construction for pedestrians and motorists. The Project NEON relocation program will help AMR Ambulance and Emergency Service find new quarters, preferably within or near the Las Vegas Medical District.

6.4 Visual Character/Aesthetics

NDOT will provide aesthetic treatments to noise barriers and structures within the project area in accordance with NDOT's Landscape and Aesthetics Master Plan.² New freeway and street lighting will employ shields to minimize light and glare impacts on adjacent residences located west of I-15.

As part of the design process, NDOT established a task force to develop the aesthetic design theme and preliminary aesthetic design plans for both structures and landscape. The task force,

²http://www.nevadadot.com/pub_involvement/landscape/unlv/MasterPlan-July3.pdf

which began meeting in July 2006, includes NDOT and City of Las Vegas staff, consultant engineers, landscape architects and public involvement specialists. The task force developed a set of three overriding themes: The Vibrant Desert, Meadows Redux, and The Corridor of Light and Shadow. The task force refined each theme and the themes were presented to the public at an open house meeting in January 2007. The task force developed the *Aesthetics and Landscape Requirements Report* (2006), which details the proposed aesthetic treatments to specific locations and structures in the project. The report can be found on the CD at the back of the DEIS or FEIS. The aesthetic treatments are considered an element of the plan and will be incorporated into the project's plans, specifications, and estimate and constructed along with the other Project NEON components.

6.5 Water Resources

6.5.1 Groundwater

Any water used to construct Project NEON will be provided by an established utility or under permit issued by the Department of Conservation and Natural Resources (Division of Water Resources.).

Any water or monitor wells or boreholes that may be located on either acquired or transferred lands are the ultimate responsibility of the owner of the property at the time of the transfer and must be plugged and abandoned as required in Chapter 534 of the Nevada Administrative Code. If any previously unidentified wells are encountered during project construction, the contractor will be responsible for Nevada Department of Water Resources notification and for retaining a Nevada-licensed driller to abandon the well if necessary.

6.5.2 Water Quality

The U.S. Army Corps of Engineers' (USACE's) comments on the DEIS indicated that NDOT should prepare an "Aquatic Resources Report" to ascertain the extent of waters on the project site. During final design NDOT will prepare the report and submit it to the USACE for review. If the USACE determines that Project NEON would affect waters of the U.S. a Section 404 permit will be required. A Section 401 Water Quality Certification issued by the Nevada Department of Environmental Protection (NDEP), Bureau of Water Quality Planning, will be required for water quality assurances. If construction equipment is required to enter any of the ephemeral stream channels, then a Temporary Working in Waterways Permit issued by NDEP, Bureau of Water Pollution Control, will be obtained by the contractor.

As part of the freeway design, source control best management practices will be followed to protect the surface water. Best management practices address site soil stabilization and reduce deposition of sediments and other pollutants in the adjacent surface waters. Typical measures include the application of soil stabilizers such as landscaping, mulch, and rock slope protection at storm drain outlets. Best management practices will also be implemented during construction. As part of the development of best management practices for the project, NDOT's construction contractor must file a Notice of Intent with NDEP's Bureau of Water Pollution Control. The Notice of Intent, and related documents, will provide coverage under the General Permit for Stormwater Discharges Associated with Construction Activity (NVR100000). A Stormwater Pollution Prevention Plan will be developed before the Notice of Intent is submitted. The Plan will outline temporary erosion and sediment controls by incorporating best

management practices that will reduce the nonpoint source pollution typically associated with construction activities.

6.6 Noise

The cost reasonableness of noise barriers was reevaluated as part of the FEIS. The reevaluation concluded that five noise barriers will meet FHWA guidelines and NDOT's feasibility and cost reasonableness criteria. The noise barriers extend along the Selected Alternative improvements from approximately Meade Avenue south of the Sahara Avenue interchange to just north of Alta Drive.

6.7 Air Conformity/Air Quality

The project-level conformity analysis provided in Section 3.11 of the FEIS, supplemented with additional analysis provided in Appendix B of this Record of Decision, demonstrates that the project-level transportation conformity requirements of 40 CFR Part 93 have been met. Project NEON is included in the approved Regional Transportation Commission of Southern Nevada 2009-2012 Transportation Improvement Program (TIP) and 2009-2030 Regional Transportation Plan (RTP), which were found to conform to the applicable State Implementation Plan (SIP) by the FHWA and FTA in March 2009 in accordance with the U.S. Environmental Protection Agency (USEPA) Transportation Conformity Rule (40 CFR 93). The design concept and scope of the Selected Alternative have not changed significantly from those assumed in the regional emissions analysis. Therefore, in accordance with the transportation related requirements federal Clean Air Act, this project conforms to the SIP and will not cause any new or contribute to any existing regional exceedances of the National Ambient Air Quality Standards.

Air quality impacts during construction will be generated by motor vehicle, machinery, and particulate emissions resulting from earthwork and other construction activities. Best practices that NDOT will implement during construction to minimize construction-related air quality issues include:

- Use appropriate construction staging locations that eliminate or minimize conflict with residential neighborhoods while reducing the potential for excessive travel to and from the work site at the expense of air quality;
- Limit idle times of diesel related construction equipment per federal, state and local laws, regulations and ordinances; and
- Use ultra low sulfur diesel fuel in all diesel powered construction equipment.

Impacts associated with fugitive dust generated by construction will be mitigated by standard dust control measures. Such measures include frequent watering of construction sites with large expanses of exposed soil, watering debris generated during the demolition of existing structures, washing construction vehicle tires before they leave construction sites, and securing and covering equipment and loose materials before transport. Dust control during construction will be accomplished in accordance with the latest version of NDOT's *Standard Specifications for Road and Bridge Construction*, which requires the application of water or other dust control measures during road construction. Furthermore, as required by the Transportation Control Measures of the 2001 PM₁₀ SIP, the construction will comply, as applicable, with Transportation Construction Rules 90-94 (Clark County Air Quality Regulations Sections 90-94).

6.8 Hazardous Materials

Contaminated soil excavated from construction areas and generated hazardous wastes will need to be analyzed before disposal to determine disposal options. Contaminated soil and potential hazardous wastes determined to contain hazardous and toxic materials in excess of applicable criteria will be managed and disposed of in accordance with applicable local, state, and federal hazardous waste regulations. Surveys will be conducted to identify asbestos containing materials for appropriate action prior to disturbing the asbestos containing materials or demolishing structures.

6.9 Cultural Resources

The mitigation process for the project's historic resources impacts are discussed in Section 5.2.3 of this document.

7. Monitoring and Enforcement Program

Permits and related approvals require coordination with NDEP (Bureau of Water Quality Planning) and USACE to ensure compliance with stormwater regulations and regulations protecting streams and possibly wetlands. Stream and wetland impacts require compliance with Section 404 of the Clean Water Act. The USACE indicated in their April 12, 2010, letter that a Section 404 permit may be necessary depending on the project's impacts on intermittent, seasonal and/or ephemeral drainages (FEIS Appendix B). During final design NDOT will prepare an Aquatic Resources Report for USACE review that will identify the waters of the U.S. along the project and potential impacts to those resources. USACE will then determine whether a Section 404 permit is required and, if required, the appropriate Section 404 permit based on the project's impacts. Water quality certification, pursuant to Section 401 of the Clean Water Act, may be required from the NDEP (Bureau of Water Quality Planning) depending on the findings of the Aquatic Resources Report. If construction equipment is required to enter any of the ephemeral stream channels, then a Temporary Working in Waterways Permit issued by Nevada Division of Environmental Protection (Bureau of Water Pollution Control) will be obtained.

As part of the freeway design, source control best management practices will be followed. As part of the development of best management practices for the project, NDOT's construction contractor must file a Notice of Intent with NDEP's Bureau of Water Pollution Control to obtain coverage under the General Permit for Stormwater Discharges Associated with Construction Activity (NVR100000). A Stormwater Pollution Prevention Plan will be developed before the Notice of Intent is submitted. The Plan will outline temporary and permanent erosion and sediment controls, locate stormwater discharge points, and describe best management practices to be implemented to prevent or reduce to the maximum extent practical stormwater pollutant discharge associated with construction activities. Doing so will satisfy requirements for a National Pollution Discharge Elimination System permit and Section 402 of the Clean Water Act.

NDOT will coordinate with FHWA and the SHPO to implement the provisions of the Programmatic Agreement, which is in Appendix A of this document.

NDOT's construction contractor will coordinate with the Clark County Department of Air Quality & Environmental Management to obtain a dust control permit prior to the start of construction.

8. Comments on Final EIS

The FEIS was made available for agency and public review beginning on June 2, 2010. The Notice of Availability was published in the *Federal Register* on June 11, 2010, and the comment period closed on July 16, 2010. The following are summaries of letters and comments that were received from federal, state, and local agencies and interest groups as part of the public record. Appendix B of this document contains copies of letters from agencies and the public on the FEIS, and responses to those comments.

8.1 Federal/County/Local Agencies

8.1.1 U.S. Environmental Protection Agency

Based on the project's number of potential relocations, the USEPA recommended that FHWA and NDOT outreach thoroughly to potential displaced and revisit the conclusion that no environmental justice impacts will occur as a result of the project. USEPA continues to believe the project may be a Project of Air Quality Concern, and recommends consultation with the RTC and USEPA air quality staff regarding this issue. Finally, they provided recommendations that mobile source air toxics impacts be assessed and mitigated.

8.1.2 Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) requested NDOT to review the current effective countywide Flood Insurance Rate Maps for Clark County and the City of Las Vegas. They noted that the City of Las Vegas is a participant in the National Flood Insurance Program, and summarized the program's minimum, basic floodplain management building requirements.

8.1.3 Federal Aviation Administration

The Federal Aviation Administration (FAA) noted that the project would not impact airports in the Las Vegas area.

8.1.4 Department of Air Quality & Environmental Management

The Clark County Department of Air Quality & Environmental Management does not anticipate any significant impacts to air quality associated with the project's proposed improvements. They stated that Project NEON meets conformity requirements for carbon monoxide, ozone, and particulate matter by its inclusion in the conforming regional transportation plan adopted by the RTC.

8.1.5 City of Las Vegas Public Works Department

The City of Las Vegas provided comments on design issues for the Charleston Boulevard interchange, the Alta Drive interchange, and the Martin Luther King/Industrial Road Connector.

8.2 Letters and Comments Received from the Public

A number of comments were received on the project hotline, email, and web site during the public comment period. The comments were generally requests to be placed on the project mailing list and real estate issues at specific properties. The comments were addressed by the project's public involvement and real estate staff.

The two letters received from the public are summarized below and found in Appendix B.

8.2.1 First Letter

The homeowner's association requested NDOT to coordinate with them during the design phase so the neighborhood could have input into the design of the proposed noise barrier adjacent to their neighborhood.

8.2.2 Second Letter

The commenter raised a number of issues including, environmental justice concerns for residents living along Martin Luther King Boulevard north of Charleston Boulevard, the impacts of the Martin Luther King/Industrial Road Connector on residents of West Las Vegas, the project's impacts on the Agassi Boys' and Girls' Club (800 North Martin Luther King Boulevard), and the lack of coordination with the RTC.

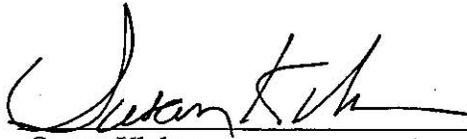
9. Conclusion

The environmental record for Project NEON includes both the DEIS and draft Section 4(f) Evaluation (September 2009) and FEIS and final Section 4(f) Evaluation (May 2010). The 30-day FEIS/Section 4(f) evaluation availability period was published in the June 11, 2010, *Federal Register* and expired on July 16, 2010. These documents, incorporated here by reference, constitute the statements required by NEPA and Title 23, United States Code (U.S.C.).

Having considered the environmental record noted above, the mitigation measures discussed herein, the written and oral comments offered by other agencies and the public on this record, and the written responses to comments, the FHWA has determined that (1) adequate opportunity was offered for the presentation of views by all parties with a significant economic, social, or environmental interest; (2) fair consideration has been given to the preservation and enhancement of the environment and to the interests of the communities in which the project is located; and (3) all reasonable steps have been taken to minimize adverse environmental effects of the proposed project.

It is the decision of FHWA to advance the project. In so doing, FHWA concludes that Project NEON complies with all applicable provisions of the National Environmental Policy Act, specifically 42 U.S.C. 4332.

October 21, 2010
Date



Susan Klekar
Division Administrator

Per SAFETEA-LU, a federal agency may publish a notice in the *Federal Register*, pursuant to 23 USC §139(l), indicating that one or more federal agencies have taken final action on permits, licenses, or approvals for a transportation project. If such notice is published, claims seeking judicial review of those federal agency actions will be barred unless such claims are filed within 180 days after the date of publication of the notice, or within such shorter time period as is specified in the federal laws pursuant to which judicial review of the federal agency action is allowed. If no notice is published, then the periods of time that otherwise are provided by the federal laws governing such claims will apply.

Summary of Project NEON Mitigation Measures

The mitigation measures below will be implemented during or before construction of Project NEON. NDOT will be primarily responsible for implementing the mitigation measures. The order of the mitigation measures follows the order in the Final EIS and this Record of Decision. These measures will be documented in project plans, designs, specifications and compliance documents as appropriate. For reference purposes, the Final EIS (FEIS) page numbers are provided in the table below to allow the reader to locate the cross-referenced discussion, in context, if needed, to clarify understanding of a given mitigation measure. It should be noted that multiple FEIS page numbers are noted for each resource topic because mitigation measures were discussed within the individual resource topics within Section 3 and collectively at the end of Section 3. For a few mitigation measures, particularly those dealing with the property acquisition process, there are only references to page numbers in the Record of Decision. This is the case because the mitigation measure was developed after the FEIS was signed and distributed.

Abbreviations and acronyms used below are as follows:

ACM	Asbestos containing material
AE	Aesthetics
AQ	Air quality
CR	Cultural Resources
FHWA	Federal Highway Administration
GW & WQ	Groundwater and Water Quality
HM	Hazardous Materials
HUD	Department of Housing and Urban Development
LiDAR	Light Detection and Range
NDEP	Nevada Division of Environmental Protection
NDOT	Nevada Department of Transportation
NS	Noise
NSHD	Nevada State Housing Division
RE	Relocations
RTC	Regional Transportation Commission of Southern Nevada
SE (TM)	Socioeconomic (Traffic Management)
SHPO	State Historic Preservation Officer
SNRHA	Southern Nevada Regional Housing Authority
USACE	U.S. Army Corps of Engineers
UT	Utilities

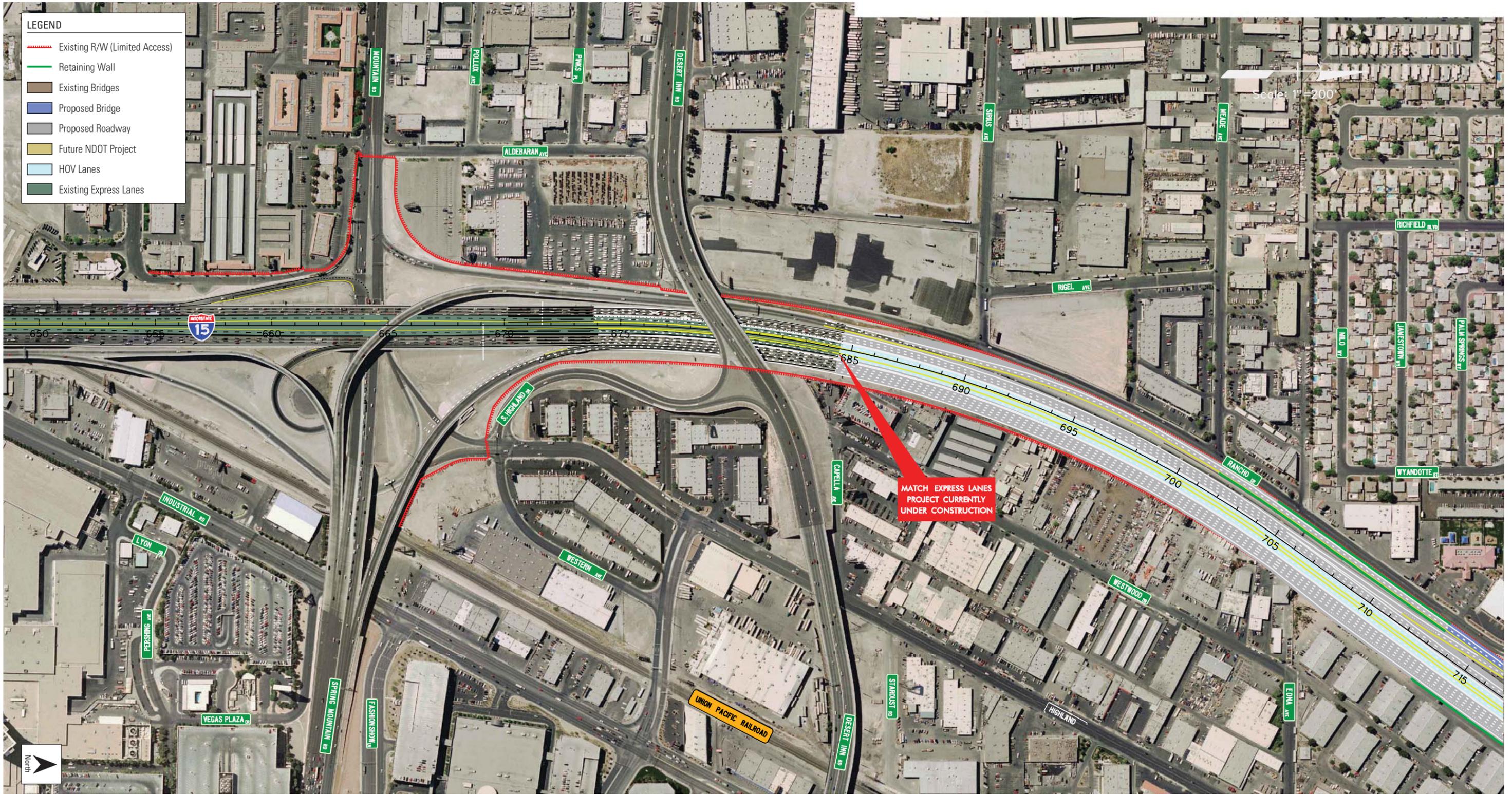
Mitigation Measure		Description
ROD	FEIS	
p. 16	SE (TM) pp. 3-12, 3-13, 3- 41, 3-87, 3-89	<p>The contractor and NDOT will coordinate with the City, RTC, and local emergency service providers in developing detour plans, including the maintenance of transit service and pedestrian circulation compliant with the Americans with Disabilities Act.</p> <p>Emergency service providers and RTC will be given advance notice of road and sidewalk closures and detour routes.</p> <p>Temporary closure of parts of I-15 and adjacent arterials for overhead construction or demolition will exempt emergency vehicles.</p> <p>The contractor will maintain local access and circulation to neighborhoods and businesses during construction for pedestrians and motorists.</p> <p>A bus stop on the south side of Alta Drive near I-15 may be relocated. To mitigate the effects of temporary service changes a public information program will be developed by NDOT in cooperation with the RTC as the Selected Alternative moves through final design and into construction. Ongoing coordination with RTC will minimize disruptions to transit and maintain existing bus stops.</p>
p. 16	UT pp. 3-30, 3-88	<p>Prior rights and franchise agreements with the City, County, and NDOT will dictate whether utility companies are responsible in full or in part for the cost of the physical relocation and easements.</p>
p. 17	Mitigation measure developed after FEIS signed	<p>NDOT will coordinate with the Department of Housing and Urban Development (HUD), the Southern Nevada Regional Housing Authority (SNRHA), and the Nevada State Housing Division (NSHD) to ensure that relocated families have information about the widest range of housing opportunities and other programs that those agencies offer to qualifying families. NDOT commits to:</p> <ul style="list-style-type: none"> • Conduct training workshops for their relocation staff to familiarize them with the housing options and programs that are available through HUD, SNRHA, and NSHD; • Conduct a housing fair during each real estate phase, in cooperation with HUD, SNRHA, and NSHD to allow affected residents to learn about housing options beyond the private market and related programs that may facilitate the transition to a new residence. Translators will be provided as needed at these fairs; and • Conduct an annual meeting with HUD, SNRHA, and NSHD to provide them updated information on the status of Project NEON real estate issues and to obtain from the housing agencies an update on the quantity of subsidized housing units in the Las Vegas Valley.

Mitigation Measure		Description
ROD	FEIS	
p. 17	Mitigation measure developed after FEIS signed	Prior to beginning real estate negotiations with the EJ community that will be relocated, NDOT will perform a number of outreach activities designed to deepen their understanding of the project's potential impacts to community cohesion and relocation needs beyond obtaining a new residence. NDOT will meet with the City of Las Vegas Neighborhood Services Department, the City Council member representing the ward where the environmental justice relocations reside, church leaders, and the Latin Chamber of Commerce.
p. 17	RE p. 3-37	NDOT has committed to updating the Project NEON Relocation Study after the Record of Decision is completed and right of way is set. If available, 2010 Census data will be used for the updated study.
pp. 17, 18	RE pp. 3-39 through 3-41, 3-88, 3-89	Uniform Act and standard NDOT relocation practices will be followed.
pp. 18, 19	AE pp. 3-43, 3-90	<p>NDOT will provide aesthetic treatments to noise barriers and structures within the project area in accordance with NDOT's Landscape and Aesthetics Master Plan. New freeway and street lighting will employ shields to minimize light and glare impacts on adjacent residences located west of I-15.</p> <p>A project task force developed the Aesthetics and Landscape Requirements Report (2006), which details the proposed aesthetic treatments to specific locations and structures in the project. The report can be found on the CD at the back of the DEIS or FEIS. The aesthetic treatments are considered an element of the Master Plan and will be incorporated into the project's plans, specifications, and estimate and constructed along with the other Project NEON components.</p>
pp. 19, 20	GW & WQ pp. 3-46, 3-47, 3-90, 3-91	<p>Groundwater – If any previously unidentified wells are encountered during project construction, the contractor would be responsible for Nevada Department of Water Resources notification and for retaining a Nevada-licensed driller to abandon the well if necessary.</p> <p>Water Quality – The U.S. Army Corps of Engineers' (USACE's) comments on the DEIS indicated that NDOT should prepare an "Aquatic Resources Report" to ascertain the extent of waters on the project site. During final design NDOT will prepare the report and submit it to the USACE for review. If the USACE determines that Project NEON would affect waters of the U.S. a Section 404 permit will be required.</p> <p>A Section 401 Water Quality Certification issued by the Nevada</p>

Mitigation Measure		Description
ROD	FEIS	
		<p>Division of Environmental Protection (NDEP), Bureau of Water Quality Planning, will be required. If construction equipment is required to enter any of the ephemeral stream channels, then a Temporary Working in Waterways Permit issued by NDEP, Bureau of Water Pollution Control, would be obtained by the contractor.</p> <p>As part of the freeway design, source control best management practices would be followed. Best management practices address site soil stabilization and reduce deposition of sediments and other pollutants in the adjacent surface waters. Best management practices would also be implemented during construction. As part of the development of best management practices for the project, NDOT's construction contractor must file a Notice of Intent with NDEP's Bureau of Water Pollution Control. The Notice of Intent, and related documents, would provide coverage under the General Permit for Stormwater Discharges Associated with Construction Activity (NVR100000). A Stormwater Pollution Prevention Plan will be developed before the Notice of Intent is submitted. The Plan will outline temporary erosion and sediment controls by incorporating best management practices that will reduce the nonpoint source pollution typically associated with construction activities.</p>
p. 20	NS pp. 3-55 through 3-61, 3-91	<p>The Final EIS concluded that five noise barriers would meet FHWA guidelines and NDOT's feasibility and cost reasonableness criteria. The noise barriers extend along the Selected Alternative improvements from approximately Meade Avenue south of the Sahara Avenue interchange to just south of Alta Drive. In addition, if feasible, new and replacement noise barriers could be constructed early in the project schedule to mitigate potential construction noise.</p>
p. 20	AQ pp. 3-75, 3-76	<p>Best practices NDOT will implement during construction to minimize construction-related air quality issues include:</p> <ul style="list-style-type: none"> • Use appropriate construction staging locations that eliminate or minimize conflict with residential neighborhoods while reducing the potential for excessive travel to and from the work site; • Limit idle times of diesel related construction equipment per federal, state and local laws, regulations and ordinances; and • Use ultra low sulfur diesel fuel in all diesel powered construction equipment. <p>Impacts associated with fugitive dust generated by construction will be mitigated by standard dust control measures. Such measures include frequent watering of construction sites with large expanses of exposed soil, watering debris generated during the demolition of</p>

Mitigation Measure		Description
ROD	FEIS	
		<p>existing structures, washing construction vehicle tires before they leave construction sites, and securing and covering equipment and loose materials before transport. Dust control during construction will be accomplished in accordance with the latest version of NDOT's Standard Specifications for Road and Bridge Construction, which requires the application of water or other dust control measures during road construction. Furthermore, as required by the Transportation Control Measures of the 2001 PM10 SIP, the construction will comply, as applicable, with Transportation Construction Rules 90-94 (Clark County Air Quality Regulations Sections 90-94).</p> <p>NDOT's construction contractor will coordinate with the Clark County Department of Air Quality & Environmental Management to obtain a dust control permit prior to the start of construction.</p>
p. 21	HM pp. 3-78, 3-91	Contaminated soil excavated from construction areas and generated hazardous wastes would need to be analyzed before disposal to determine disposal options. Contaminated soil and potential hazardous wastes determined to contain hazardous and toxic materials in excess of applicable criteria would be managed and disposed of in accordance with applicable local, state, and federal hazardous waste regulations. Surveys would be conducted to identify asbestos containing material (ACM) for appropriate action prior to disturbing the ACM or demolishing structures. Efforts would be made to recycle non-hazardous materials in accordance with USEPA guidelines.
p. 15	CR p. 3-82	To mitigate Project NEON's impacts on historic resources NDOT will coordinate with FHWA and the SHPO to implement the provisions of the Programmatic Agreement, which is in Appendix A of the ROD.
p. 15	CR pp. 3-83, 3-91	NDOT would record the affected eligible properties with 35mm black and white photography. To mitigate for the demolition of the entire Buena Vista historic district and part of the Glen Heather subdivision, NDOT's Location Division would use Light Detection and Range (LiDAR) scanners to record the neighborhoods. All houses in the Buena Vista Historic District and the houses on the northeast and southwest sides of Loch Lomond Street in the Glen Heather Estates subdivision would be scanned. NDOT's Location Division would develop three-dimensional digital "fly-throughs" of the Buena Vista Historic District and Loch Lomond Street in the Glen Heather Estates subdivision. The data would be either maintained by NDOT or provided to SHPO.

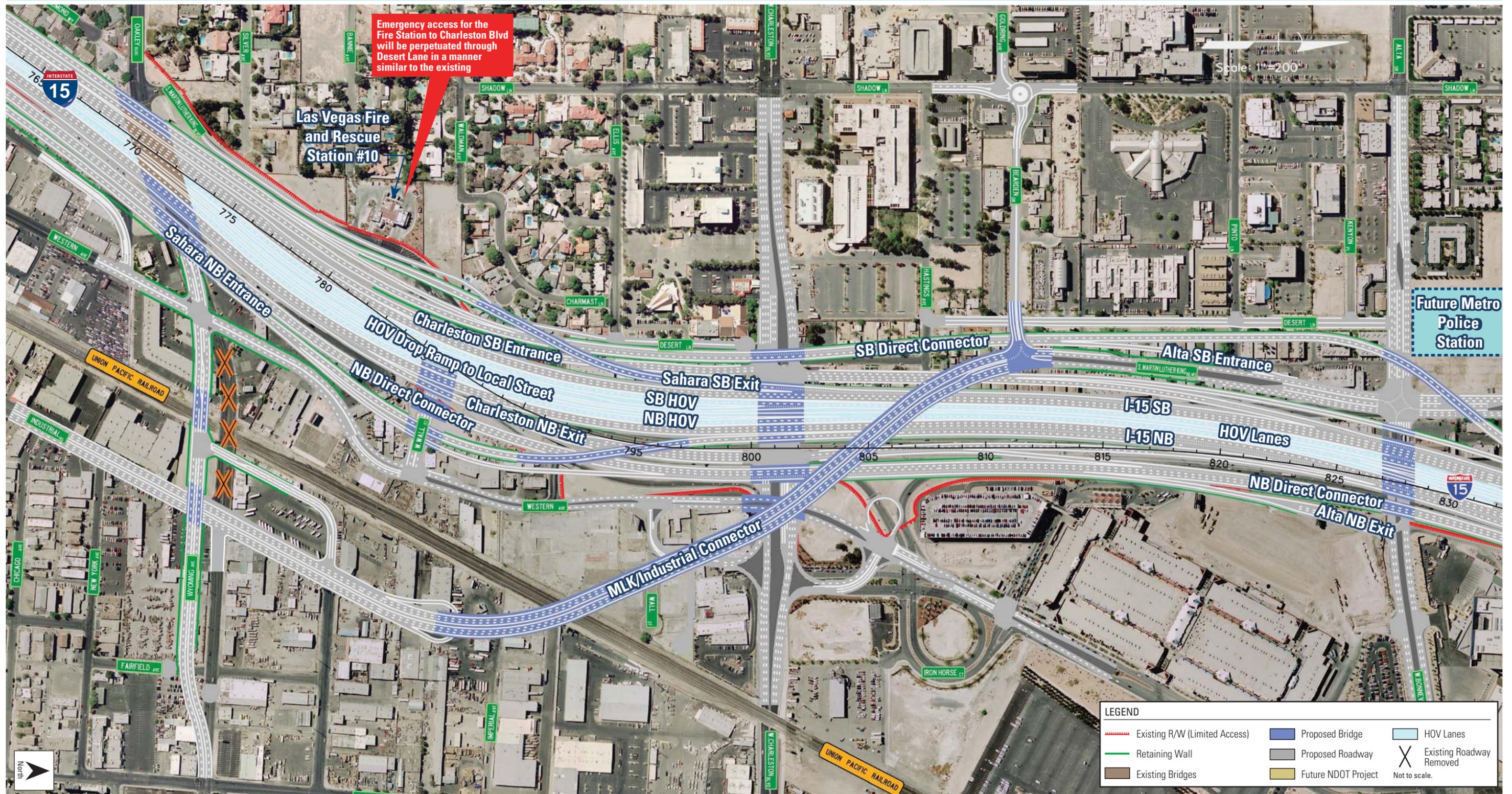
Mitigation Measure		Description
ROD	FEIS	
p. 15	CR pp. 3-83, 3-91	Before demolition, the Buena Vista homes on Desert Lane, Martin Luther King Boulevard, and Hastings Avenue and the Glen Heather Estates homes on Loch Lomond Way would be opened for salvage. NDOT would advertise the salvage nationally to attract the largest number of people, and thus reuse as much of the historic building material as possible. Salvage activities would be allowed according to federal and state regulations governing ACM, which may prohibit salvaging.
p. 15	CR pp. 3-83, 3-92	<p>Only part of each lot on the east side of Loch Lomond Way would be needed for highway widening. NDOT may sell the remaining land for redevelopment. If the remaining land is sold, NDOT would desire that the land is used in a way that is compatible with the surrounding neighborhood.</p> <p>NDOT would explore methods for encouraging that new construction in Glen Heather Estates is compatible with the historic feeling of the neighborhood, but may not have the legal authority to require developers to abide by its recommended architectural design guidelines. However, the City of Las Vegas, a cooperating agency on Project NEON, may be able to use the provisions of Assembly Bill 340 (passed in June 2009) to require that new construction be compatible with Glen Heather Estates' historic feeling. Among other things, Assembly Bill 340 expanded Las Vegas' ability to maintain the character of historic neighborhoods.</p>



Not to scale.

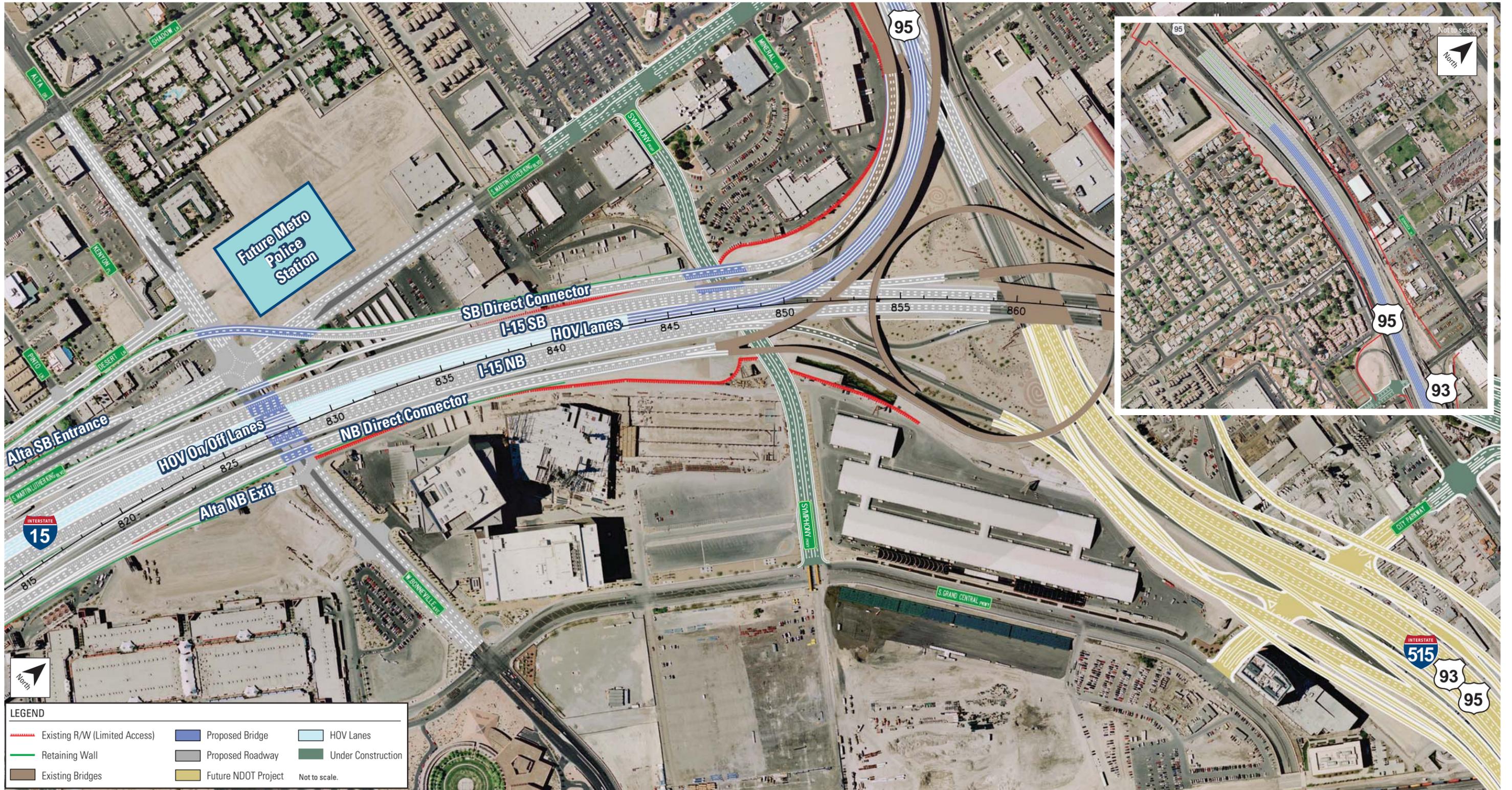






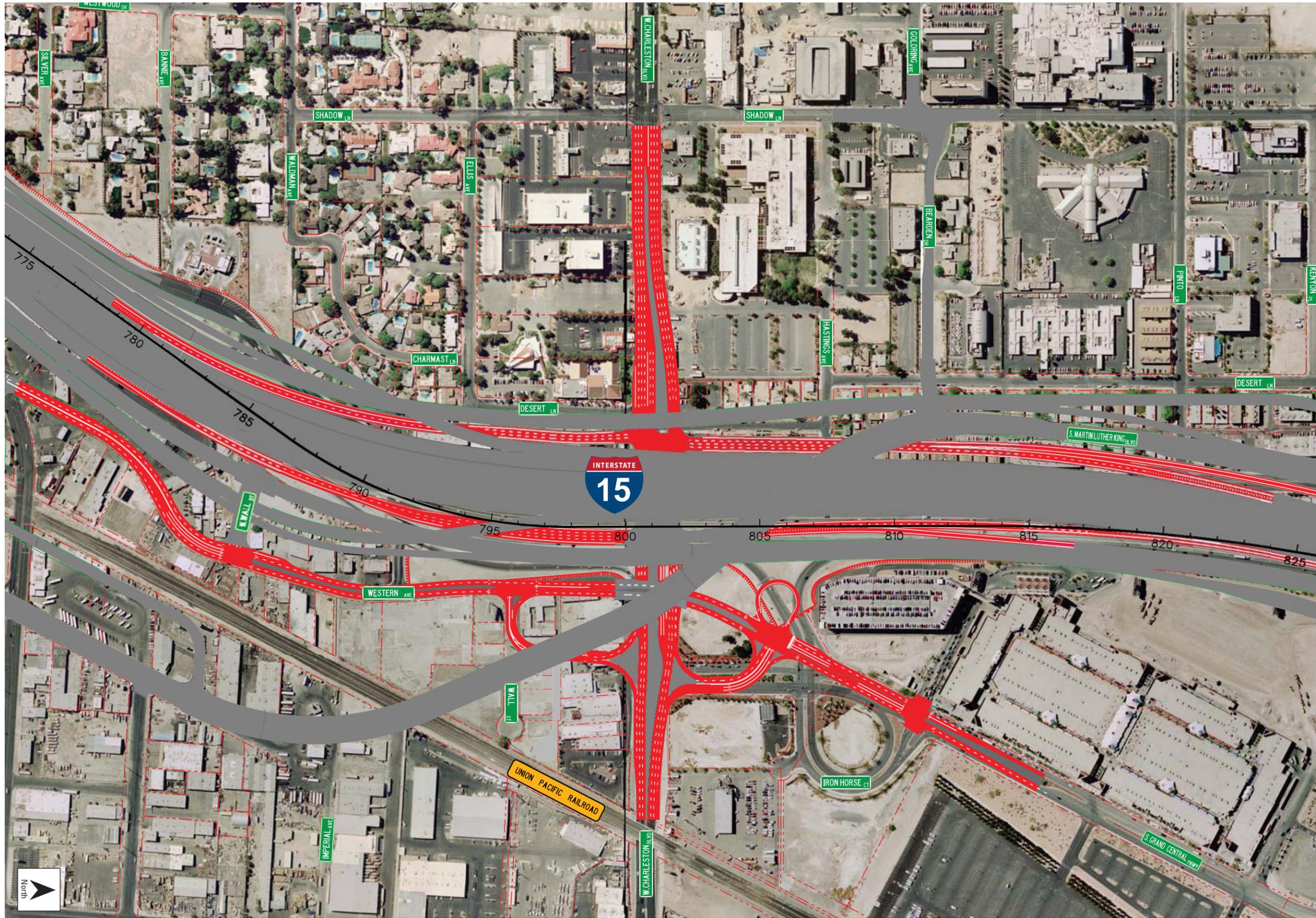
Not to scale.





Not to scale. Note: HOV lanes built as part of Project NEON will tie into existing US 95 HOV lanes near Rancho Drive. No new right-of-way will be acquired in this area.



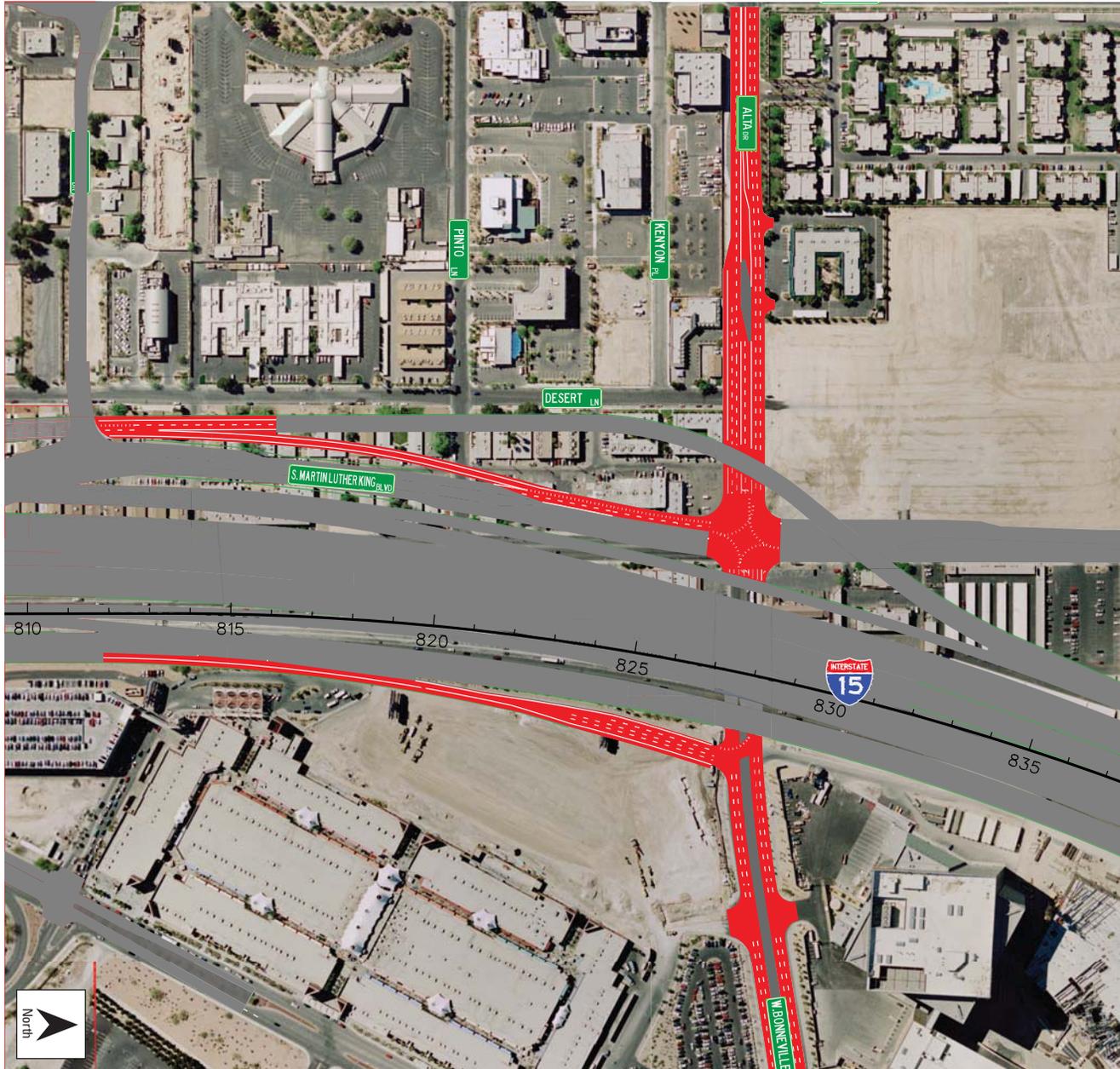


LEGEND

- Other NEON Components
- I-15/Charleston Boulevard Interchange

Not to scale.





LEGEND

- Other NEON Components
- Alta Drive/Bonneville Avenue Half Interchange

Not to scale.





LEGEND

- Other NEON Components
- Martin Luther King Boulevard-Industrial Road Connector

Not to scale.





Not to scale.



Exhibit 6
Oakey Boulevard/Wyoming Avenue Overpass

I-15 Corridor and Local Arterial Improvements



Appendix A
Signed Programmatic Agreement with the SHPO



JIM GIBBONS
Governor

MICHAEL E. FISCHER
Department Director

STATE OF NEVADA
DEPARTMENT OF CULTURAL AFFAIRS

State Historic Preservation Office

100 N. Stewart Street

Carson City, Nevada 89701

(775) 684-3448 • Fax (775) 684-3442

www.nvshpo.org

RONALD M. JAMES
State Historic Preservation Officer

September 2, 2010

Abdelmoez Abdalla
Environmental Program Manager
Federal Highway Administration
705 North Plaza Street Suite 220
Carson City NV 89701

RE: Programmatic Agreement for Project NEON: I-15, from the Sahara Avenue Interchange to the I-15/US-95/I-515 Interchange, Las Vegas, Clark County (Undertaking #2010-0480).

Dear Abdelmoez Abdalla:

The Nevada State Historic Preservation Office (SHPO) has signed the attached Programmatic Agreement for the subject undertaking.

Please forward a copy of this document to the Advisory Council on Historic Preservation for filing.

If you have any questions concerning this correspondence, please feel free to contact me at (775) 684-3443 or by e-mail at Rebecca.Palmer@nevadaculture.org.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Lynn Palmer".

Rebecca Lynn Palmer, Deputy
State Historic Preservation Officer

COPY

RECEIVED

SEP 09 2010

U.S. HISTORIC
PRESERVATION OFFICE

Programmatic Agreement

By and Between

**The United States of America, By and Through Its Federal Highway
Administration, The State of Nevada, By and Through Its
State Historic Preservation Office, and The State Of
Nevada, By and Through Its Department of Transportation
Regarding**

Project Neon: I-15 from the Sahara Avenue Interchange to the I-15/US-95/I-515 Interchange Las Vegas, Clark County, Nevada

WHEREAS, pursuant to the provisions contained in Chapter 408 of the Nevada Revised Statutes, the Director of the DEPARTMENT may enter into agreements necessary to carry out the provisions of the Chapter; and

WHEREAS, The United States of America, by and through its Federal Highway Administration (FHWA), proposes to provide financial assistance to The State of the Nevada, by and through its Department of Transportation (NDOT) for implementation of road widening along state and federally designated roadways in Las Vegas, Nevada (hereinafter referred to as "The Undertaking"); and

WHEREAS, The Undertaking is commonly referred to as "Project Neon" and includes the expansion of I-15 from the Sahara Avenue Interchange to the I-15/US-95/I-515 Interchange in Las Vegas, Clark County, Nevada (Appendix A, attached hereto and incorporated herein); and

WHEREAS, in compliance with The United States of America's Secretary of the Interior's Standards, and to partially fulfill their Section 106 requirements, the FHWA and NDOT conducted an architectural inventory of Historic Properties within the Area of Potential Effect (APE) of the Undertaking titled: "Architectural Inventory: I-15 'Project Neon' from Sirius Avenue to West Bonanza Road, Las Vegas, Clark County, Nevada" and submitted it to State Historic Preservation Office (SHPO) for concurrence in June 2008; and

WHEREAS, the FHWA, as the lead Federal agency, for compliance with the National Historic Preservation Act (16 U.S.C. 470(f)), has determined that the proposed Project Neon will have an adverse effect on historic properties (Appendix A) that are included in, or are eligible for inclusion in, the National Register of Historic Places (NRHP) and has consulted with The State of Nevada, by and through its State Historic Preservation Office (SHPO) pursuant to 36 CFR 800 regulations implementing Section 106 of the National Historic Preservation Act of 1966 as amended; and

COPY

WHEREAS, on September 12, 2008 the SHPO concurred that the Undertaking will have an adverse effect on historic properties that are included in or eligible for inclusion in the National Register of Historic Places (NRHP) (Appendix A); and

WHEREAS, the FHWA has invited the Advisory Council on Historic Preservation (Council) and NDOT to participate in this consultation and to concur in this Programmatic Agreement (PA) and

WHEREAS, the Council has declined participation as a party to this Programmatic Agreement; and

WHEREAS, the definitions set forth in 36 CFR 800.16 are incorporated herein by reference and apply throughout this PA (Appendix A).

NOW, THEREFORE, the FHWA, SHPO and NDOT agree that The Undertaking shall be implemented in accordance with the following stipulations to ensure that adverse effects on Historic Properties will be avoided, lessened or mitigated, to the extent practicable, to satisfy Section 106 responsibilities.

I. MITIGATION

A. Project Neon is scheduled to be completed in phases. The scope of work for each phase cannot be predicted at the time this PA is signed. As the scope of work for each phase is finalized, NDOT will prepare a treatment plan for each phase that will stipulate how FHWA will avoid, lessen, or mitigate the adverse effects that phase of the Project will have on properties that are eligible for inclusion in, or included in the NRHP.

B. FHWA will ensure that the mitigation stipulations in the treatment plans are implemented.

C. NDOT will submit treatment plans for upcoming phases of work directly to SHPO for their concurrence.

1. SHPO will have 30 calendar days to review the treatment plan and concur, not concur, request more information or offer comments.

2. Communication will be directly between SHPO and NDOT with a courtesy copy of all correspondence sent to FHWA.

3. Any disputes regarding treatment will be handled in accordance with Stipulation II. B. of this PA.

4. NDOT shall ensure that historic, architectural, and archaeological work conducted pursuant to this PA is carried out by, or under the direct supervision of, persons meeting qualifications set forth in the Secretary of the Interior's Professional Qualification Standards (36 CFR 61).

5. Notices to Proceed (NTP) with construction may be issued by NDOT for each Project phase after implementation of a treatment plan for the Project phase, and

- (a) the fieldwork phase of the treatment option has been completed; and
- (b) the NDOT has accepted, and the SHPO has reviewed, a summary description of the fieldwork performed and a reporting schedule for that work.

II. ADMINISTRATIVE STIPULATIONS

The FHWA will ensure that the following administrative stipulations are implemented:

A. Progress Monitoring

1. Starting on July 4, 2010,

Once a year the NDOT Environmental Services Division shall prepare and provide an annual report to the SHPO and FHWA addressing the following topics:

- a. Progress in constructing I-15 improvements as it pertains to Project Neon;
- b. Progress in the preparation and implementation of treatment plans.
- c. Any Section 106 problems or unexpected issues encountered during the year; and
- d. Any modifications that FHWA and/or NDOT believe should be made in implementation of this agreement.

2. The annual report will be submitted on or before July 4 of each year, starting in 2010. An annual report will be submitted until the FHWA, SHPO, and NDOT agree in writing that the terms of this agreement have been fulfilled.

3. The SHPO shall review the annual report. Any concerns expressed by SHPO, or other consulting parties, should be handled per the dispute resolution clause II. B.

4. At the request of any party to this agreement, FHWA shall ensure that a meeting or meetings are held to facilitate review and comment, to resolve questions about the PA, or to resolve adverse comments that arise from the annual report.

B. Dispute Resolution

1. Should any party to this agreement object in writing to the FHWA regarding any action carried out or proposed with respect to the undertaking or implementation of this agreement, the FHWA shall consult with the objecting party to resolve the objection. If after initiating such consultation the FHWA determines that the objection cannot be resolved through consultation, the FHWA shall forward all documentation relevant to the objection to the Advisory Council on Historic Preservation (Council), including the agency's proposed response to the objection. Within 30 days after receipt of all pertinent documentation, the Council shall exercise one of the following options:

a. Advise the FHWA that the Council concurs in the agency's proposed response to the objection, whereupon the agency will respond to the objection accordingly;

b. Provide the FHWA with recommendations, which FHWA shall take into account in reaching a final decision regarding its response to the objection; or

c. Notify the agency that the objection will be referred for comment pursuant to 36 CFR 800.7(a) (4), and proceed to refer the objection and comment. The agency shall take the resulting comment into account in accordance with 36 CFR 800.7(c) (4) and Section 110(l) of NHPA.

2. Should the Council not exercise one of the above options within 30 days after receipt of all pertinent documentation, FHWA may assume the Council's concurrence in its proposed response to the objection.

3. FHWA shall take into account any Council recommendation or comment provided in accordance with this stipulation with reference only to the subject of the objection; FHWA's responsibility to carry out all actions under this agreement that are not the subjects of the objection shall remain unchanged.

4. At any time during implementation of the measures stipulated in this agreement, should an objection pertaining to this agreement or the effect of the undertaking on historic properties be raised by a member of the public, the FHWA shall notify the parties to this agreement and take the objection into account, consulting with the objector and, should the objector so request, with any of the parties to this agreement to resolve the objection.

C. Amendment

1. Any party to this Programmatic Agreement may propose to the FHWA that the agreement be amended, whereupon FHWA shall consult with the other parties to this agreement to consider such an amendment per 36 CFR 800.6(c)(1)

D. Termination

1. If FHWA, NDOT or SHPO determines that it cannot implement the terms of this Agreement, or if FHWA, NDOT or SHPO determines that the Agreement is not being properly implemented, such party may propose to the other parties to this Agreement that it be terminated.
2. The party proposing to terminate this Agreement shall so notify all parties to this Agreement, explaining the reasons for termination and affording them at least 30 days to consult and seek alternatives to termination. The parties shall then consult.
3. Should such consultation fail, FHWA, NDOT or SHPO may terminate the Agreement by so notifying all parties in writing.
4. Should this Agreement be terminated prior to the completion of the Project contemplated by this Agreement, FHWA shall either:
 - a. Consult in accordance with 36 CFR 800.6 to develop a new Programmatic Agreement; or
 - b. Request the comments of the Council pursuant to 36 CFR 800.7.
5. In the event the Nevada Legislature does not appropriate sufficient or any funds for NDOT's biennium during the term of this Agreement, this Agreement shall terminate.

E. Expiration

1. If the terms of this Agreement have not been implemented and completed by July 4, 2020, this Agreement shall be considered expired. In such event the FHWA shall so notify the parties to this Agreement, and if it chooses to continue with the Project contemplated by this Agreement, shall re-initiate review of the Project in accordance with 36 CFR Part 800.

III. SIGNATORIES AND CONCURRENCE

- A. Execution of this Programmatic Agreement, together with its submission by FHWA to the Advisory Council on Historic Preservation pursuant to 36 CFR 800.6(b)(1)(iv) and its implementation, evidences FHWA has taken into account the effects of the Undertaking on historic properties, and has afforded the Advisory Council on Historic Preservation a reasonable opportunity to comment on the Undertaking.

IV. MISCELLANEOUS

A. It is specifically agreed between the parties executing this Agreement that it is not intended by any of the provisions of any part of the Agreement to create in the public or any member thereof a third party beneficiary status hereunder, or to authorize anyone not a party to this Agreement to maintain a suit for personal injuries or property damage pursuant to the terms or provisions of this Agreement.

B. The parties are associated with each other only for the purposes and to the extent set forth in this Agreement. Each party is and shall be a public agency separate and distinct from the other party and shall have the right to supervise, manage, operate, control and direct performance of the details incident to its duties under this Agreement. Nothing contained in this Agreement shall be deemed or construed to create a partnership or joint venture, to create relationships of an employer-employee or principal-agent, or to otherwise create any liability for one agency whatsoever with respect to the indebtedness, liabilities, and obligations of the other agency or any other party.

C. The parties hereto represent and warrant that the person executing this Agreement on behalf of each party has full power and authority to enter into this Agreement and that the parties are authorized by law to engage in the action set forth herein.

D. Pursuant to NRS 239.010, information or documents may be open to public inspection and copying. The parties will have the duty to disclose unless a particular record is confidential by law or a common law balancing of interests.

E. Each party shall keep confidential all information, in whatever form, produced, prepared, observed or received by that party to the extent that such information is confidential by law or otherwise required to be kept confidential by this Agreement.

F. The illegality or invalidity of any provision or portion of this Agreement shall not affect the validity of the remainder of the Agreement and this Agreement shall be construed as if such provision did not exist. The unenforceability of such provision shall not be held to render any other provision or provisions of this Agreement unenforceable.

G. This Agreement shall not become effective until and unless approved by appropriate official action of the governing body of each party.

H. This Agreement constitutes the entire agreement of the parties and such is intended as a complete and exclusive statement of the promises, representations, negotiations, discussions, and other agreements that may have been made in connection with the subject matter hereof. Unless an integrated attachment to this Agreement specifically displays a mutual intent to amend a particular part of this

Agreement, general conflicts in language between any such attachment and this Agreement shall be construed consistent with the terms of this Agreement.

I. All notices or other communications required or permitted to be given under this Agreement shall be in writing and shall be deemed to have been duly given if delivered personally in hand, by telephonic facsimile with simultaneous regular mail, or mailed certified mail, return receipt requested, postage prepaid on the date posted, and addressed to the other party at the address set forth below:

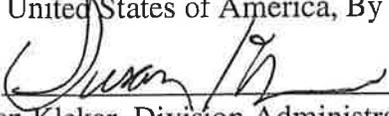
FOR NDOT: Susan Martinovich, P.E., Director
Attn.: Steve Cooke
Nevada Department of Transportation
Environmental Division
1263 South Stewart Street
Carson City, NV 89712
Phone: 775-888-7686
Fax: 775-888-7104
E-mail: scooke@dot.state.nv.us

FOR SHPO: Ron James, State Historic Preservation Officer
Nevada State Historic Preservation Office
100 N. Stewart Street
Carson City, NV 89701
Phone: 775-684-3440
Fax: 775-684-3442
E-mail: rjames@nevadaculture.org

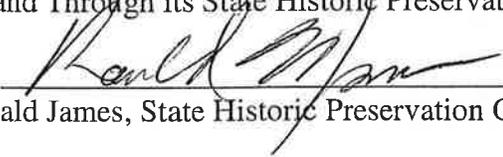
FOR FHWA: Susan Klekar, P.E., Director
Attn: Abdelmoez Abdalla
Federal Highway Administration
Environmental Division
705 North Plaza Street, Suite 220
Carson City, NV, 8971
Phone: 775-687-1231
Fax: 775-687-3803
E-mail: abdelmoez.abdalla@fhwa.dot.gov

IN WITNESS WHEREOF, The United States of America, By and Through Its Federal Highway Administration, The State of Nevada, By and Through Its State Historic Preservation Office, and The State Of Nevada, By and Through Its Department of Transportation have hereby caused their names to be signed on the date first written above.

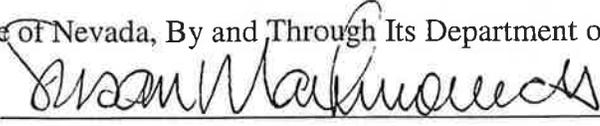
The United States of America, By and Through Its Federal Highway Administration

By: 
Susan Klekar, Division Administrator, FHWA

State of Nevada
By and Through its State Historic Preservation Office

By:  9-2-2010
Ronald James, State Historic Preservation Officer

State of Nevada, By and Through Its Department of Transportation

By: 
Susan Martinovich, Director, NDOT



Legend

 Project Neon APE

Project Neon Area of Potential Effect
Las Vegas, Clark County, NV

THIS MAP IS FOR DISPLAY PURPOSES ONLY.
 MAP COMPILED FROM BEST AVAILABLE DATA SOURCES.
 NOT ALL FEATURES PORTRAYED DUE TO SCALE.

DATA PROVIDED BY ENVIRONMENTAL DIVISION
 ARCHAEOLOGY SECTION



Jim Gibbons
 Governor



Susan Martinovich, P.E.
 Director

Nevada Department of Transportation
 1253 South Stewart Street
 Carson City, Nevada 89712
 (775) 885-7000

Table of Adversely Affected Properties

	Street Name	APN	Name	Subdivision	Impact
1	2004 Birch St	162-04-411-009	Residence	Glen Heather	Demolition
2	307 Charleston Blvd, W	162-04-504-002	7-Up Bottling Plant/Charleston Antique Mall	NA	Demolition
3	217 Colorado Ave, W	162-04-507-008	Commercial	NA	Demolition
4	1000 Desert Ln	139-33-411-006	Residence	Buena Vista	Demolition
5	1001 Desert Ln	139-33-411-012	Residence	Buena Vista	Demolition
6	1010 Desert Ln	139-33-411-004	Residence	Buena Vista	Demolition
7	1011 Desert Ln	139-33-411-014	Residence	Buena Vista	Demolition
8	1016 Desert Ln	139-33-411-003	Residence	Buena Vista	Demolition
9	1020 Desert Ln	139-33-411-002	Residence	Buena Vista	Demolition
10	1021 Desert Ln	139-33-411-016	Residence	Buena Vista	Demolition
11	1024 Desert Ln	139-33-411-020	Residence	Buena Vista	Demolition
12	1025 Desert Ln	139-33-411-017	Residence	Buena Vista	Demolition
13	501 (& 505) Desert Ln	139-33-306-001	Apartments	NA	Demolition
14	1508 Hastings Ave	139-33-411-010	Residence	Buena Vista	Demolition
15	1512 Hastings Ave	139-33-411-009	Residence	Buena Vista	Demolition
16	1516 Hastings Ave	139-33-411-008	Residence	Buena Vista	Demolition
17	1522 Hastings Ave	139-33-411-007	Residence	Buena Vista	Demolition
18	1920 Highland Ave	162-04-301-007	Commercial	NA	Demolition
19	1550 Industrial Rd	162-04-606-003	Showtime Tours	NA	Demolition
20	1705 Loch Lomond Way	162-04-311-033	Residence	Glen Heather	Demolition
21	1709 Loch Lomond Way	162-04-311-032	Residence	Glen Heather	Demolition
22	1901 Loch Lomond Way	162-04-311-018	Residence	Glen Heather	Demolition
23	940 Martin L King Blvd, S	139-33-411-011	Residence	Buena Vista	Demolition

36 CFR 800.16 Definitions

(a) *Act* means the National Historic Preservation Act of 1966, as amended, 16 U.S.C. 470-470w-6.

(b) *Agency* means agency as defined in 5 U.S.C. 551.

(c) *Approval of the expenditure of funds* means any final agency decision authorizing or permitting the expenditure of Federal funds or financial assistance on an undertaking, including any agency decision that may be subject to an administrative appeal.

(d) *Area of potential effects* means 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.

(e) *Comment* means the findings and recommendations of the Council formally provided in writing to the head of a Federal agency under section 106.

(f) *Consultation* means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process. The Secretary's "Standards and Guidelines for Federal Agency Preservation Programs pursuant to the National Historic Preservation Act" provide further guidance on consultation.

(g) *Council* means the Advisory Council on Historic Preservation or a Council member or employee designated to act for the Council.

(h) *Day or days* means calendar days.

(i) *Effect* means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.

(j) *Foreclosure* means an action taken by an agency official that effectively precludes the Council from providing comments which the agency official can meaningfully consider prior to the approval of the undertaking.

(k) *Head of the agency* means the chief official of the Federal agency responsible for all aspects of the agency's actions. If a State, local or tribal government has assumed or has

been delegated responsibility for section 106 compliance, the head of that unit of government shall be considered the head of the agency.

(l)(1) *Historic property* means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

(2) The term *eligible for inclusion in the National Register* includes both properties formally determined as such in accordance with regulations of the Secretary of the Interior and all other properties that meet the National Register criteria.

(m) *Indian tribe* means an Indian tribe, band, nation, or other organized group or community, including a native village, regional corporation or village corporation, as those terms are defined in section 3 of the Alaska Native Claims Settlement Act (43 U.S.C. 1602), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

(n) *Local government* means a city, county, parish, township, municipality, borough, or other general purpose political subdivision of a State.

(o) *Memorandum of agreement* means the document that records the terms and conditions agreed upon to resolve the adverse effects of an undertaking upon historic properties.

(p) *National Historic Landmark* means a historic property that the Secretary of the Interior has designated a National Historic Landmark.

(q) *National Register* means the National Register of Historic Places maintained by the Secretary of the Interior.

(r) *National Register criteria* means the criteria established by the Secretary of the Interior for use in evaluating the eligibility of properties for the National Register (36 CFR part 60).

(s)(1) *Native Hawaiian organization*

means any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians.

(2) *Native Hawaiian* means any individual who is a descendant of the aboriginal people who, prior to 1778, occupied and exercised sovereignty in the area that now constitutes the State of Hawaii.

(t) *Programmatic agreement* means a document that records the terms and conditions agreed upon to resolve the potential adverse effects of a Federal agency program, complex undertaking or other situations in accordance with § 800.14(b).

(u) *Secretary* means the Secretary of the Interior acting through the Director of the National Park Service except where otherwise specified.

(v) *State Historic Preservation Officer (SHPO)* means the official appointed or designated pursuant to section 101(b)(1) of the act to administer the State historic preservation program or a representative designated to act for the State historic preservation officer.

(w) *Tribal Historic Preservation Officer (THPO)* means the tribal official appointed by the tribe's chief governing authority or designated by a tribal ordinance or preservation program who has assumed the responsibilities of the SHPO for purposes of section 106 compliance on tribal lands in accordance with section 101(d)(2) of the act.

(x) *Tribal lands* means all lands within the exterior boundaries of any Indian reservation and all dependent Indian communities.

(y) *Undertaking* means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.

(z) *Senior policy official* means the senior policy level official designated by the head of the agency pursuant to section 3(e) of Executive Order 13287.

Treatment Plan Outline

I. Executive Summary

II. Introduction

III. Maps of Project Neon

IV. Description of Phase

A. APE Map of Phase #

V. NR Eligible Resources Identified in Phase #

A. Table of Historic Resources within Phase X APE

VI. Potential for Phase # to Cause Effects

A. Table of Adversely Affected NR Eligible properties within Phase # APE

VII. Proposed Mitigation

VIII. Schedule for Completion of Mitigation

IX. Personnel Involved with Mitigation

X. Bibliography

Advisory Council Declines to Participate in PA

Dickey, Elizabeth A

From: Creger, Charles C
Sent: Thursday, July 22, 2010 12:29 PM
To: Dickey, Elizabeth A
Subject: FW: No ACHP comment on the NEON PA

C. Cliff Creger
Chief Archaeologist
Nevada Department of Transportation
1263 S. Stewart St.
Carson City, Nv 89712
(775) 888-7666
ccreger@dot.state.nv.us

From: Najah Duvall-Gabriel [[mailto:ngabriel@achp.gov](mailto:malto:ngabriel@achp.gov)]
Sent: Monday, March 15, 2010 9:47 AM
To: abdelmoez.abdalla@fhwa.dot.gov
Cc: Creger, Charles C; Carol Legard; Charlene Vaughn
Subject: No ACHP comment on the NEON PA

Del,

As we discussed over the phone, the ACHP declines to comment on the Project NEON Programmatic Agreement (PA), as we declined to participate as a party to this PA. It is in keeping with our policy to not comment on agreement documents to which we are not a party. And we are confident that the Nevada State Historic Preservation Office and the other consulting parties will provide the expertise needed for the development of this PA. If you have any questions, please feel free to contact me.

Best,
Najah

Najah Duvall-Gabriel
Historic Preservation Specialist
Advisory Council on Historic Preservation
(o) 202.606.8585 (f) 202.606.5072
ngabriel@achp.gov

Appendix B

SHPO Concurrence Letter for Project Neon



JIM GIBBONS
Governor

MICHAEL E. FISCHER
Department Director

STATE OF NEVADA
DEPARTMENT OF CULTURAL AFFAIRS

State Historic Preservation Office
100 N. Stewart Street
Carson City, Nevada 89701
(775) 684-3448 • Fax (775) 684-3442
www.nvshpo.org

RONALD M. JAMES
State Historic Preservation Officer

September 12, 2008

Abdelmoez A. Abdalla
Environmental Program Manager
Federal Highway Administration (FHWA)
Nevada Division
705 N. Plaza St. Ste. 220
Carson City, NV 89701

Re: Review of Report Titled *Proposed Improvements to I-15 between Sirius Avenue and US 95 in Las Vegas, Clark County (FHWA NH-015-1(129)041; E.A. 73178; NDOT CL08-001R)* (aka 'Project Neon') and SHPO Response to Determinations of Eligibility and Effect.

Dear Mr. Abdalla:

The Nevada State Historic Preservation Office (SHPO) has finished reviewing the architectural report and undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. At this time, the SHPO offers the following comments:

Area of Potential Effect (APE)

The SHPO concurs with the APE as defined in the above report's *Introduction of the Architectural Inventory for Project Neon* (pages four through ten).

Determinations of Eligibility

The SHPO concluded there were a total of seven-hundred and ninety-nine (799) properties within the APE. Of that number, three-hundred and fifty-nine (359) were documented using the Nevada Historic Resources Inventory Form (HRIF). The pages that follow list all of the properties with SHPO responses regarding their determinations of eligibility.

Additionally, one historic district, the Buena Vista Subdivision (BVS), was found within the project APE. Out of a total of eighteen (18) properties within the BVS district, fourteen (14) are 'contributing' and four (4) are 'non-contributing.' They are indicated with an asterisk (*) in the following lists.

The SHPO concurs with FHWA that the following ninety-nine (99) properties are 'eligible' to the National Register of Historic Places (NR):

#	Street Address	APN	Built	Eligibility
1	1817 Birch St.	162-04-312-044	1963	Eligible-A
2	1415 Bonanza Rd., West	139-28-801-002	1962	Eligible-A
3	1622 Commerce St, South	162-04-609-015	1956	Eligible-A
4	930 Desert Ln.	139-33-402-029	1951	Eligible-A
5	1704 Ivanhoe Way	162-04-311-002	1963	Eligible-A
6	1709 Loch Lomond Way	162-04-311-032	1963	Eligible-A
7	1725 Bannie Ave.	162-04-210-053	1963	Eligible-A&C
8	1816 Blrch St.	162-04-312-039	1962	Eligible-A&C
9	2004 Birch St.	162-04-411-009	1962	Eligible-A&C
10	601 Bonanza Rd., West	139-27-401-002	1946	Eligible-A&C
11	1508 Bryn Mawr Ave.	162-04-312-057	1956	Eligible-A&C
12	1513 Bryn Mawr Ave.	162-04-312-002	1959	Eligible-A&C
13	1516 Bryn Mawr Ave.	162-04-312-055	1963	Eligible-A&C
14	1520 Bryn Mawr Ave.	162-04-312-054	1956	Eligible-A&C
15	1609 Bryn Mawr Ave.	162-04-312-007	1956	Eligible-A&C
16	2 Charleston Blvd., West	139-33-811-015	1940	Eligible-A&C
17	231 (241) Charleston Blvd., West	162-04-504-011	1954	Eligible-A&C
18	307 Charleston Blvd., West	162-04-504-002	1953	Eligible-A&C
19	217 Colorado Ave., West	162-04-507-008	1952	Eligible-A&C
20	1034 Commerce St., South	139-33-801-009	1957	Eligible-A&C
21	1054 Commerce St., South	139-33-801-011	1962	Eligible-A&C
22	1070 Commerce St., South	139-33-801-013	1953	Eligible-A&C
23	501 Desert Ln.	139-33-306-001	1963	Eligible-A&C
24	922 Desert Ln.	139-33-402-024	1952	Eligible-A&C
25	1000 Desert Ln.* (Contributing)	139-33-411-006	1949	Eligible-A&C
26	1001 Desert Ln.* (Contributing)	139-33-411-012	1949	Eligible-A&C
27	1010 Desert Ln.* (Contributing)	139-33-411-004	1949	Eligible-A&C
28	1011 Desert Ln.* (Contributing)	139-33-411-014	1949	Eligible-A&C
29	1016 Desert Ln.* (Contributing)	139-33-411-003	1949	Eligible-A&C
30	1020 Desert Ln.* (Contributing)	139-33-411-002	1949	Eligible-A&C
31	1021 Desert Ln.* (Contributing)	139-33-411-016	1949	Eligible-A&C
32	1024 Desert Ln.* (Contributing)	139-33-411-020	1949	Eligible-A&C
33	1025 Desert Ln.* (Contributing)	139-33-411-017	1949	Eligible-A&C
34	1608 Ellis Ave.	162-04-510-005	1955	Eligible-A&C
35	1704 Fairfield Ave.	162-04-710-068	1956	Eligible-A&C
36	2108 Glen Heather Way	162-04-410-011	1962	Eligible-A&C
37	2112 Glen Heather Way	162-04-410-012	1962	Eligible-A&C
38	2121 Glen Heather Way	162-04-411-002	1962	Eligible-A&C
39	2133 Glen Heather Way	162-04-410-008	1962	Eligible-A&C
40	2137 Glen Heather Way	162-04-410-007	1962	Eligible-A&C

#	Street Address	APN	Built	Eligibility
41	2201 Glen Heather Way	162-04-410-006	1962	Eligible-A&C
42	2204 Glen Heather Way	162-04-410-017	1962	Eligible-A&C
43	2205 Glen Heather Way	162-04-410-005	1962	Eligible-A&C
44	2209 Glen Heather Way	162-04-410-004	1962	Eligible-A&C
45	2212 Glen Heather Way	162-04-410-019	1962	Eligible-A&C
46	2213 Glen Heather Way	162-04-410-003	1962	Eligible-A&C
47	2221 Glen Heather Way	162-04-410-001	1962	Eligible-A&C
48	1508 Hastings Ave.* (Contributing)	139-33-411-010	1949	Eligible-A&C
49	1512 Hastings Ave.* (Contributing)	139-33-411-009	1949	Eligible-A&C
50	1516 Hastings Ave.* (Contributing)	139-33-411-008	1949	Eligible-A&C
51	1522 Hastings Ave.* (Contributing)	139-33-411-007	1949	Eligible-A&C
52	1920 Highland Ave.	162-04-301-007	1963	Eligible-A&C
53	2601 Highland Dr.	162-09-110-017	1962	Eligible-A&C
54	2611 Highland Dr.	162-09-110-014	1960	Eligible-A&C
55	2330 Highland Dr.	162-04-402-003	1964	Eligible-A&C
56	1400 Industrial Rd.	162-04-606-001	1955	Eligible-A&C
57	1550 Industrial Rd.	162-04-606-005	1955	Eligible-A&C
58	1706 Industrial Rd.	162-04-704-002	1954	Eligible-A&C
59	1800 Industrial Rd.	162-04-704-003	1964	Eligible-A&C
60	1516 Inverness Ave.	162-04-312-048	1963	Eligible-A&C
61	1517 Inverness Ave.	162-04-312-025	1962	Eligible-A&C
62	1708 Ivanhoe Way	162-04-311-003	1963	Eligible-A&C
63	1720 Ivanhoe Way	162-04-311-006	1963	Eligible-A&C
64	1721 Ivanhoe Way	162-04-311-057	1963	Eligible-A&C
65	1728 Ivanhoe Way	162-04-311-008	1963	Eligible-A&C
66	1800 Ivanhoe Way	162-04-311-009	1963	Eligible-A&C
67	1801 Ivanhoe Way	162-04-311-055	1963	Eligible-A&C
68	1701 Kiltie Way	162-04-311-042	1963	Eligible-A&C
69	1708 Kiltie Way	162-04-311-045	1963	Eligible-A&C
70	1720 Kiltie Way	162-04-311-048	1963	Eligible-A&C
71	1513 Kirkland Ave.	162-04-312-052	1959	Eligible-A&C
72	1517 Kirkland Ave.	162-04-312-053	1962	Eligible-A&C
73	1520 Kirkland Ave.	162-04-312-019	1963	Eligible-A&C
74	1608 Kirkland Ave.	162-04-312-016	1962	Eligible-A&C
75	2107 Kirkland Ave.	162-04-312-023	1962	Eligible-A&C
76	1704 Loch Lomond Way	162-04-311-036	1963	Eligible-A&C
77	1705 Loch Lomond Way	162-04-311-033	1963	Eligible-A&C
78	1728 Loch Lomond Way	162-04-311-049	1963	Eligible-A&C
79	1901 Loch Lomond Way	162-04-311-018	1963	Eligible-A&C
80	541 Martin L. King Blvd., S.	139-33-701-005	1965	Eligible-A&C
81	940 Martin L. King Blvd., S.* (Cont)	139-33-411-011	1949	Eligible-A&C
82	239 New York Ave., West	162-04-710-138	1961	Eligible-A&C
83	180 New York Ave., West	162-04-710-007	1959	Eligible-A&C

#	Street Address	APN	Built	Eligibility
84	184 New York Ave., West	162-04-710-148	1954	Eligible-A&C
85	201 New York Ave., West	162-04-710-067	1954	Eligible-A&C
86	217 New York Ave., West	162-04-710-143	1955	Eligible-A&C
87	1801 Silver Ave.	162-04-210-080	1984	Eligible-A&C
88	231 Utah Ave., West	162-04-608-003	1980	Eligible-A&C
89	300 Utah Ave., West	162-04-607-017	1963	Eligible-A&C
90	320 Utah Ave., West	162-04-607-007	1954	Eligible-A&C
91	331 Utah Ave., West	162-04-608-001	1955	Eligible-A&C
92	1701 Waldman Ave.	162-04-210-019	1964	Eligible-A&C
93	1301 Western Ave.	162-04-505-004	1963	Eligible-A&C
94	1320 Western Ave.	162-04-503-006	1963	Eligible-A&C
95	1408 Western Ave.	162-04-602-003	1959	Eligible-A&C
96	1901 Western Ave.	162-04-703-007	1960	Eligible-A&C
97	2300 Western Ave.	162-04-404-001	1965	Eligible-A&C
98	105 Wyoming Ave., West	162-04-609-007	1958	Eligible-A&C
99	108 Wyoming Ave., West	162-04-608-009	1952	Eligible-A&C

The SHPO concurs with FHWA that the following two-hundred-and-forty-five (245) properties are 'not eligible' to the NR:

#	Street Address	APN	Built	Eligibility
1	1700 Bannie Ave.	162-04-210-020	1959	Not Eligible
2	1710 Bannie Ave.	162-04-210-021	1961	Not Eligible
3	1600 Bearden Dr.	139-33-402-011	1956	Not Eligible
4	1604 Bearden Dr.	139-33-402-010	1953	Not Eligible
5	1605 Bearden Dr.	139-33-402-019	1956	Not Eligible
6	1608 Bearden Dr.	139-33-402-009	1958	Not Eligible
7	1700 Bearden Dr.	139-33-402-008	1955	Not Eligible
8	1706 Bearden Dr.	139-33-402-007	1957	Not Eligible
9	1712 Bearden Dr.	139-33-402-004	1962	Not Eligible
10	1808 Birch St.	162-04-312-041	1962	Not Eligible
11	1809 Birch St.	162-04-312-042	1963	Not Eligible
12	1812 Birch St.	162-04-312-040	1962	Not Eligible
13	1813 Birch St.	162-04-312-043	1963	Not Eligible
14	1820 Birch St.	162-04-312-038	1962	Not Eligible
15	1821 Birch St.	162-04-312-045	1963	Not Eligible
16	1900 Birch St.	162-04-312-037	1962	Not Eligible
17	1904 Birch St.	162-04-312-036	1962	Not Eligible
18	1908 Birch St.	162-04-312-035	1962	Not Eligible
19	1909 Birch St.	162-04-312-033	1963	Not Eligible
20	1913 Birch St.	162-04-312-059	1963	Not Eligible
21	2008 Birch St.	162-04-411-008	1962	Not Eligible
22	No # listed Bonanza Rd., West	139-27-301-003	1945	Not Eligible
23	1509 Bryn Mawr Ave.	162-04-312-001	1959	Not Eligible

#	Street Address	APN	Built	Eligibility
24	1512 Bryn Mawr Ave.	162-04-312-056	1956	Not Eligible
25	1517 Bryn Mawr Ave.	162-04-312-003	1959	Not Eligible
26	1521 Bryn Mawr Ave.	162-04-312-004	1959	Not Eligible
27	1601 Bryn Mawr Ave.	162-04-312-005	1959	Not Eligible
28	1604 Bryn Mawr Ave.	162-04-312-011	1956	Not Eligible
29	1605 Bryn Mawr Ave.	162-04-312-006	1959	Not Eligible
30	1608 Bryn Mawr Ave.	162-04-312-010	1960	Not Eligible
31	105 Charleston Blvd, West	162-04-506-008	1961	Not Eligible
32	303 Charleston Blvd, West	162-04-504-004	1958/1969	Not Eligible
33	123 Colorado Ave., West	162-04-507-004	1946	Not Eligible
34	215 Colorado Ave., West	162-04-507-002	1955	Not Eligible
35	1400 Commerce St., South	162-04-607-003	1951	Not Eligible
36	1406 Commerce St., South	162-04-607-006	1955	Not Eligible
37	1410 Commerce St., South	162-04-607-015	1955	Not Eligible
38	1520 Commerce St., South	162-04-608-010	1957	Not Eligible
39	1528 Commerce St., South	162-04-608-016	1953	Not Eligible
40	1606 Commerce St., South	162-04-609-008	1964	Not Eligible
41	525 Desert Ln.	139-33-307-002	1963	Not Eligible
42	529 Desert Ln.	139-33-307-003	1963	Not Eligible
43	531 Desert Ln.	139-33-307-004	1963	Not Eligible
44	601 Desert Ln.	139-33-309-001	1961	Not Eligible
45	611 Desert Ln.	139-33-309-015	1961	Not Eligible
46	621 Desert Ln.	139-33-309-016	1961	Not Eligible
47	631 Desert Ln.	139-33-309-017	1961	Not Eligible
48	641 Desert Ln.	139-33-309-018	1961	Not Eligible
49	651 Desert Ln.	139-33-309-019	1961	Not Eligible
50	661 Desert Ln.	139-33-309-007	1961	Not Eligible
51	671 Desert Ln.	139-33-309-013	1961	Not Eligible
52	681 Desert Ln.	139-33-309-014	1961	Not Eligible
53	691 Desert Ln.	139-33-309-010	1961	Not Eligible
54	801 Desert Ln.	139-33-403-007	1962	Not Eligible
55	811 Desert Ln.	139-33-403-008	1962	Not Eligible
56	821 Desert Ln.	139-33-403-009	1962	Not Eligible
57	901 Desert Ln.	139-33-403-003	1962	Not Eligible
58	911 Desert Ln.	139-33-403-005	1962	Not Eligible
59	921 Desert Ln.	139-33-403-006	1962	Not Eligible
60	926 Desert Ln.	139-33-402-028	1953	Not Eligible
61	1006 Desert Ln.* (Non-cont.)	139-33-411-005	1949	Not Eligible
62	1007 Desert Ln.* (Non-cont.)	139-33-411-013	1944	Not Eligible
63	1017 Desert Ln.* (Non-cont.)	139-33-411-015	1949	Not Eligible
64	1031 Desert Ln.* (Non-cont.)	139-33-411-018	1949	Not Eligible
65	1111 Desert Ln.	162-04-501-003	1951	Not Eligible
66	1117 Desert Ln.	162-04-501-004	1951	Not Eligible
67	1620 Ellis Ave.	162-04-510-007	1956	Not Eligible

#	Street Address	APN	Built	Eligibility
68	2101 Glen Heather Way	162-04-411-007	1962	Not Eligible
69	2104 Glen Heather Way	162-04-410-010	1962	Not Eligible
70	2105 Glen Heather Way	162-04-411-006	1962	Not Eligible
71	2109 Glen Heather Way	162-04-411-005	1962	Not Eligible
72	2113 Glen Heather Way	162-04-411-004	1962	Not Eligible
73	2117 Glen Heather Way	162-04-411-003	1962	Not Eligible
74	2124 Glen Heather Way	162-04-410-013	1962	Not Eligible
75	2125 Glen Heather Way	162-04-411-001	1962	Not Eligible
76	2128 Glen Heather Way	162-04-410-014	1962	Not Eligible
77	2129 Glen Heather Way	162-04-410-009	1962	Not Eligible
78	2132 Glen Heather Way	162-04-410-015	1962	Not Eligible
79	2200 Glen Heather Way	162-04-410-016	1962	Not Eligible
80	2208 Glen Heather Way	162-04-410-018	1962	Not Eligible
81	2216 Glen Heather Way	162-04-410-020	1962	Not Eligible
82	2217 Glen Heather Way	162-04-410-002	1962	Not Eligible
83	2220 Glen Heather Way	162-04-410-021	1962	Not Eligible
84	2000 Highland Ave.	162-04-301-008	1964	Not Eligible
85	2056 Highland Ave.	162-04-301-009	1965	Not Eligible
86	2112 Highland Ave.	162-04-301-011	1963	Not Eligible
87	2120 Highland Ave.	162-04-301-012	1964	Not Eligible
88	2130 Highland Dr.	162-04-402-001	1963	Not Eligible
89	2407 Highland Dr.	162-04-404-009	1964	Not Eligible
90	2411 Highland Dr.	162-04-404-011	1963	Not Eligible
91	2441 Highland Dr.	162-04-404-013	1963	Not Eligible
92	2753 Highland Dr.	162-09-102-003	1962	Not Eligible
93	2603 Highland Dr.	162-09-110-016	1964	Not Eligible
94	123 Imperial Ave., West	162-04-507-011	1953	Not Eligible
95	1401 Industrial Rd.	162-04-607-001	1952	Not Eligible
96	1405 Industrial Rd.	162-04-607-002	1952	Not Eligible
97	1407 Industrial Rd.	162-04-607-004	1953	Not Eligible
98	1414 Industrial Rd.	162-04-606-002	1953	Not Eligible
99	1515 Industrial Rd.	162-04-608-005	1952	Not Eligible
100	1519 Industrial Rd.	162-04-608-006	1964	Not Eligible
101	1607 Industrial Rd.	162-04-609-010	1962	Not Eligible
102	1675 Industrial Rd.	162-04-710-001	1962	Not Eligible
103	2515 Industrial Rd.	162-09-104-002	1955	Not Eligible
104	no # listed Industrial Rd.	162-04-607-019	1963	Not Eligible
105	1512 Inverness Ave.	162-04-312-049	1963	Not Eligible
106	1513 Inverness Ave.	162-04-312-024	1962	Not Eligible
107	1520 Inverness Ave.	162-04-312-047	1963	Not Eligible
108	1521 Inverness Ave.	162-04-312-026	1962	Not Eligible
109	1524 Inverness Ave.	162-04-312-048	1963	Not Eligible
110	1601 Inverness Ave.	162-04-312-027	1962	Not Eligible
111	1605 Inverness Ave.	162-04-312-028	1962	Not Eligible

A. Abdalla
 September 12, 2008
 Page 7

#	Street Address	APN	Built	Eligibility
112	1609 Inverness Ave.	162-04-312-029	1962	Not Eligible
113	1613 Inverness Ave.	162-04-312-030	1962	Not Eligible
114	1908 Inverness Ave.	162-04-312-032	1963	Not Eligible
115	1614 Inverness Ave.	162-04-312-031	1980	Not Eligible
116	1700 Ivanhoe Way	162-04-311-001	1963	Not Eligible
117	1701 Ivanhoe Way	162-04-311-062	1963	Not Eligible
118	1705 Ivanhoe Way	162-04-311-061	1963	Not Eligible
119	1709 Ivanhoe Way	162-04-311-060	1963	Not Eligible
120	1712 Ivanhoe Way	162-04-311-004	1963	Not Eligible
121	1713 Ivanhoe Way	162-04-311-059	1963	Not Eligible
122	1716 Ivanhoe Way	162-04-311-005	1963	Not Eligible
123	1717 Ivanhoe Way	162-04-311-058	1963	Not Eligible
124	1724 Ivanhoe Way	162-04-311-007	1963	Not Eligible
125	1725 Ivanhoe Way	162-04-311-056	1963	Not Eligible
126	1804 Ivanhoe Way	162-04-311-010	1963	Not Eligible
127	1805 Ivanhoe Way	162-04-311-054	1963	Not Eligible
128	1808 Ivanhoe Way	162-04-311-011	1963	Not Eligible
129	1812 Ivanhoe Way	162-04-311-012	1963	Not Eligible
130	1700 Kiltie Way	162-04-311-043	1963	Not Eligible
131	1704 Kiltie Way	162-04-311-044	1963	Not Eligible
132	1705 Kiltie Way	162-04-311-041	1963	Not Eligible
133	1709 Kiltie Way	162-04-311-040	1963	Not Eligible
134	1712 Kiltie Way	162-04-311-046	1963	Not Eligible
135	1716 Kiltie Way	162-04-311-047	1963	Not Eligible
136	1508 Kirkland Ave.	162-04-312-022	1959	Not Eligible
137	1509 Kirkland Ave.	162-04-312-051	1959	Not Eligible
138	1512 Kirkland Ave.	162-04-312-021	1959	Not Eligible
139	1516 Kirkland Ave.	162-04-312-020	1956	Not Eligible
140	1600 Kirkland Ave.	162-04-312-018	1956	Not Eligible
141	1604 Kirkland Ave.	162-04-312-017	1962	Not Eligible
142	1605 Kirkland Ave.	162-04-312-012	1962	Not Eligible
143	1609 Kirkland Ave.	162-04-312-013	1962	Not Eligible
144	1612 Kirkland Ave.	162-04-312-015	1962	Not Eligible
145	1613 Kirkland Ave.	162-04-312-014	1962	Not Eligible
146	2105 Kirkland Ave.	162-04-312-050	1961	Not Eligible
147	1700 Loch Lomond Way	162-04-311-035	1963	Not Eligible
148	1701 Loch Lomond Way	162-04-311-034	1963	Not Eligible
149	1708 Loch Lomond Way	162-04-311-037	1963	Not Eligible
150	1712 Loch Lomond Way	162-04-311-038	1963	Not Eligible
151	1713 Loch Lomond Way	162-04-311-031	1963	Not Eligible
152	1716 Loch Lomond Way	162-04-311-039	1963	Not Eligible
153	1717 Loch Lomond Way	162-04-311-030	1963	Not Eligible
154	1721 Loch Lomond Way	162-04-311-029	1963	Not Eligible

#	Street Address	APN	Built	Eligibility
155	1725 Loch Lomond Way	162-04-311-028	1963	Not Eligible
156	1729 Loch Lomond Way	162-04-311-027	1963	Not Eligible
157	1732 Loch Lomond Way	162-04-311-050	1963	Not Eligible
158	1733 Loch Lomond Way	162-04-311-026	1963	Not Eligible
159	1800 Loch Lomond Way	162-04-311-051	1963	Not Eligible
160	1801 Loch Lomond Way	162-04-311-025	1963	Not Eligible
161	1804 Loch Lomond Way	162-04-311-052	1963	Not Eligible
162	1805 Loch Lomond Way	162-04-311-024	1963	Not Eligible
163	1808 Loch Lomond Way	162-04-311-053	1963	Not Eligible
164	1809 Loch Lomond Way	162-04-311-023	1963	Not Eligible
165	1813 Loch Lomond Way	162-04-311-022	1963	Not Eligible
166	1817 Loch Lomond Way	162-04-311-021	1963	Not Eligible
167	1821 Loch Lomond Way	162-04-311-020	1963	Not Eligible
168	1825 Loch Lomond Way	162-04-311-019	1963	Not Eligible
169	1900 Loch Lomond Way	162-04-311-013	1963	Not Eligible
170	1904 Loch Lomond Way	162-04-311-014	1963	Not Eligible
171	1905 Loch Lomond Way	162-04-311-017	1963	Not Eligible
172	1909 Loch Lomond Way	162-04-311-016	1963	Not Eligible
173	1913 Loch Lomond Way	162-04-311-015	1963	Not Eligible
174	1064 Main St, South	139-33-811-014	1951	Not Eligible
175	273 Martin L. King Blvd., S.	139-33-501-008	1965	Not Eligible
176	285 Martin L. King Blvd., S.	139-33-501-009	1962	Not Eligible
177	301 Martin L. King Blvd., S.	139-33-601-001	1963	Not Eligible
178	600 Martin L. King Blvd., S.	139-33-309-002	1961	Not Eligible
179	610 Martin L. King Blvd., S.	139-33-309-011	1961	Not Eligible
180	620 Martin L. King Blvd., S.	139-33-309-012	1961	Not Eligible
181	670 Martin L. King Blvd., S.	139-33-309-008	1962	Not Eligible
182	800 Martin L. King Blvd., S.	139-33-404-008	1962	Not Eligible
183	810 Martin L. King Blvd., S.	139-33-404-009	1962	Not Eligible
184	820 Martin L. King Blvd., S.	139-33-404-010	1962	Not Eligible
185	900 Martin L. King Blvd., S.	139-33-404-003	1962	Not Eligible
186	910 Martin L. King Blvd., S.	139-33-404-004	1962	Not Eligible
187	920 Martin L. King Blvd., S.	139-33-404-006	1962	Not Eligible
188	930 Martin L. King Blvd., S.	139-33-404-007	1962	Not Eligible
189	1112 Martin L. King Blvd., S.	162-04-501-005	1965	Not Eligible
190	1404 Martin L. King Blvd., S.	162-04-601-001	1946	Not Eligible
191	510 Martin L. King Blvd., S.	139-33-308-002	1964	Not Eligible
192	630 Martin L. King Blvd., S.	139-33-309-006	1961	Not Eligible
193	208 New York Ave., West	162-04-710-147	1954	Not Eligible
194	213 New York Ave., West	162-04-710-144	1955	Not Eligible
195	216 New York Ave., West	162-04-710-003	1960	Not Eligible
196	221 New York Ave., West	162-04-710-142	1956	Not Eligible
197	1604 Oakey Blvd., West	162-04-602-009	1965, 1984	Not Eligible
198	2800 Rancho Dr., South	162-08-610-104	1963	Not Eligible

#	Street Address	APN	Built	Eligibility
199	1900 Sahara Ave., West	162-04-402-007	1962	Not Eligible
200	709 Shadow Ln.	139-33-402-003	1948	Not Eligible
201	625 Shadow Ln.	139-33-305-020	1953	Not Eligible
202	1700 Silver Ave.	162-04-210-056	1954	Not Eligible
203	1811 Silver Ave.	162-04-210-079	1964	Not Eligible
204	2502 Teddy Dr.	162-08-502-013	1964	Not Eligible
205	238 Utah Ave., West	162-04-607-010	1964	Not Eligible
206	311 Utah Ave., West	162-04-608-002	1956	Not Eligible
207	324 Wall St.	162-04-513-002	1954	Not Eligible
208	1109 Western Ave.	162-04-504-001	1955	Not Eligible
209	1115 Western Ave.	162-04-504-010	1953	Not Eligible
210	1121 Western Ave.	162-04-513-001	1953	Not Eligible
211	1300 Western Ave.	162-04-503-005	1957	Not Eligible
212	1327 Western Ave.	162-04-605-001	1961	Not Eligible
213	1400 Western Ave.	162-04-602-002	1959	Not Eligible
214	1407 Western Ave.	162-04-605-002	1958	Not Eligible
215	1412 Western Ave.	162-04-602-007	1963	Not Eligible
216	1414 Western Ave.	162-04-602-001	1955	Not Eligible
217	1415 Western Ave.	162-04-605-004	1956	Not Eligible
218	1422 Western Ave.	162-04-602-006	1962	Not Eligible
219	1500 Western Ave.	162-04-602-011	1964	Not Eligible
220	1508 Western Ave.	162-04-602-010	1963	Not Eligible
221	1515 Western Ave.	162-04-605-006	1962	Not Eligible
222	1531 Western Ave.	162-04-605-007	1960	Not Eligible
223	1701 Western Ave.	162-04-703-002	1953	Not Eligible
224	1704 Western Ave.	162-04-702-002	1964	Not Eligible
225	1820 Western Ave.	162-04-702-004	1965	Not Eligible
226	1900 Western Ave.	162-04-302-008	1963	Not Eligible
227	1910 Western Ave.	162-04-302-009	1963	Not Eligible
228	1921 Western Ave.	162-04-703-009	1965	Not Eligible
229	1924 Western Ave.	162-04-302-002	1962	Not Eligible
230	2101 Western Ave.	162-04-703-012	1960	Not Eligible
231	2111 Western Ave.	162-04-801-001	1960	Not Eligible
232	2112 Western Ave.	162-04-302-007	1964	Not Eligible
233	2125 Western Ave.	162-04-406-003	1963	Not Eligible
234	2135 Western Ave.	162-04-406-005	1964	Not Eligible
235	2310 Western Ave.	162-04-404-002	1961	Not Eligible
236	2320 Western Ave.	162-04-404-003	1964	Not Eligible
237	2408 Western Ave.	162-04-404-010	1963	Not Eligible
238	2600 Western Ave.	162-09-110-004	1964	Not Eligible
239	111 Wyoming Ave., West	162-04-609-006	1963	Not Eligible
240	112 Wyoming Ave., West	162-04-608-008	1953	Not Eligible
241	214 Wyoming Ave., West	162-04-608-014	1954	Not Eligible

#	Street Address	APN	Built	Eligibility
242	218 Wyoming Ave., West	162-04-608-013	1955	Not Eligible
243	221 Wyoming Ave., West	162-04-609-003	1961	Not Eligible
244	236 Wyoming Ave., West	162-04-608-011	1963	Not Eligible
245	208 Wyoming Ave., West	162-04-608-015	1953	Not Eligible

Additionally, the SHPO acknowledges the following four-hundred-twenty-two (422) properties were not surveyed using the HRIF and remain 'unevaluated'. They were either vacant or not yet forty years of age when surveyed in 2007.

#	Street Address	APN	Built	Eligibility
1	216 Alexander Darius Ct.	139-33-112-044	2007	Unevaluated
2	217 Alexander Darius Ct.	139-33-112-045	2007	Unevaluated
3	220 Alexander Darius Ct.	139-33-112-043	2007	Unevaluated
4	221 Alexander Darius Ct.	139-33-112-046	2007	Unevaluated
5	224 Alexander Darius Ct.	139-33-112-042	2007	Unevaluated
6	225 Alexander Darius Ct.	139-33-112-047	2007	Unevaluated
7	228 Alexander Darius Ct.	139-33-112-041	2007	Unevaluated
8	229 Alexander Darius Ct.	139-33-112-048	2007	Unevaluated
9	232 Alexander Darius Ct.	139-33-112-040	2007	Unevaluated
10	233 Alexander Darius Ct.	139-33-112-049	2007	Unevaluated
11	236 Alexander Darius Ct.	139-33-112-039	2007	Unevaluated
12	237 Alexander Darius Ct.	139-33-112-050	2007	Unevaluated
13	1601 Alta Dr.	139-33-304-015	1979	Unevaluated
14	1617 Alta Dr.	139-33-304-013	1993	Unevaluated
15	1625 Alta Dr.	139-33-304-017	Vacant	Unevaluated
16	1640 Alta Dr.	139-33-202-006	1995	Unevaluated
17	1700 Alta Dr.	139-33-202-001	1989	Unevaluated
18	No # listed Alta Dr.	139-33-304-014	1993	Unevaluated
19	1701 Bannie Ave.	162-04-210-055	1983	Unevaluated
20	1721 Bannie Ave.	162-04-210-054	1988	Unevaluated
21	1601 Bearden Dr.	139-33-402-020	1985	Unevaluated
22	1701 Bearden Dr.	139-33-402-030	1997	Unevaluated
23	1707 Bearden Dr.	139-33-402-015	Vacant	Unevaluated
24	1710 Bearden Dr.	139-33-402-006	Vacant	Unevaluated
25	1711 Bearden Dr.	139-33-402-014	Vacant	Unevaluated
26	No # listed Birch St.	162-04-312-058	0	Unevaluated
27	No # listed Bryn Mawr Ave.	162-04-312-008	Vacant	Unevaluated
28	No # listed Bryn Mawr Ave.	162-04-312-009	Vacant	Unevaluated

#	Street Address	APN	Built	Eligibility
29	952 Charleston Blvd., West	139-33-810-002	Vacant	Unevaluated
30	1500 Charleston Blvd., West	139-33-411-019	1967	Unevaluated
31	1505 Charleston Blvd., West	162-04-501-001	1970	Unevaluated
32	1515 Charleston Blvd., West	162-04-510-004	1982	Unevaluated
33	1522 Charleston Blvd., West	139-33-411-001	1983	Unevaluated
34	1601 Charleston Blvd., West	162-04-510-003	1979	Unevaluated
35	1619 Charleston Blvd., West	162-04-510-002	Vacant	Unevaluated
36	1701 Charleston Blvd., West	162-04-510-001	1973	Unevaluated
37	1707 Charleston Blvd., West	162-04-112-010	1979	Unevaluated
38	1712 Charleston Blvd., West	139-33-406-003	1969	Unevaluated
39	1720 Charleston Blvd., West	139-33-406-002	1997	Unevaluated
40	1725 Charleston Blvd., West	162-04-112-009	1979	Unevaluated
41	1200 Charmast Ln.	162-04-512-025	1970	Unevaluated
42	1204 Charmast Ln.	162-04-512-024	1970	Unevaluated
43	1205 Charmast Ln.	162-04-512-003	1970	Unevaluated
44	1208 Charmast Ln.	162-04-512-023	1972	Unevaluated
45	1209 Charmast Ln.	162-04-512-004	1972	Unevaluated
46	1212 Charmast Ln.	162-04-512-022	1972	Unevaluated
47	1213 Charmast Ln.	162-04-512-005	1972	Unevaluated
48	1216 Charmast Ln.	162-04-512-021	1970	Unevaluated
49	1300 Charmast Ln.	162-04-512-020	1973	Unevaluated
50	1304 Charmast Ln.	162-04-512-018	1969	Unevaluated
51	1308 Charmast Ln.	162-04-512-017	1972	Unevaluated
52	1312 Charmast Ln.	162-04-512-016	1972	Unevaluated
53	1313 Charmast Ln.	162-04-512-012	1972	Unevaluated
54	1316 Charmast Ln.	162-04-115-004	1970	Unevaluated
55	1317 Charmast Ln.	162-04-512-013	1972	Unevaluated
56	1321 Charmast Ln.	162-04-512-014	1970	Unevaluated
57	1325 Charmast Ln.	162-04-512-015	1969	Unevaluated
58	No # listed Charmast Ln.	162-04-512-019	Vacant	Unevaluated
59	123 Colorado Ave., West	162-04-507-003	1989	Unevaluated
60	1054 Commerce St., South	139-33-801-010	Vacant	Unevaluated
61	1054 Commerce St., South	139-33-801-012	1974	Unevaluated
62	1112 Commerce St., South	162-04-506-007	1976	Unevaluated
63	1220 Commerce St., South	162-04-506-003	1971	Unevaluated
64	1300 Commerce St., South	162-04-507-005	1994	Unevaluated
65	1502 Commerce St., South	162-04-608-004	Vacant	Unevaluated

#	Street Address	APN	Built	Eligibility
66	1530 Commerce St., South	162-04-608-017	Vacant	Unevaluated
67	1704 Crystal Ann Ave.	139-33-112-057	2007	Unevaluated
68	1708 Crystal Ann Ave.	139-33-112-058	2007	Unevaluated
69	1712 Crystal Ann Ave.	139-33-112-059	2007	Unevaluated
70	1716 Crystal Ann Ave.	139-33-112-060	2007	Unevaluated
71	1720 Crystal Ann Ave.	139-33-112-061	2007	Unevaluated
72	1721 Crystal Ann Ave.	139-33-112-084	2007	Unevaluated
73	1724 Crystal Ann Ave.	139-33-112-062	2007	Unevaluated
74	1725 Crystal Ann Ave.	139-33-112-083	2007	Unevaluated
75	1728 Crystal Ann Ave.	139-33-112-063	2007	Unevaluated
76	1729 Crystal Ann Ave.	139-33-112-082	2007	Unevaluated
77	1732 Crystal Ann Ave.	139-33-112-064	2007	Unevaluated
78	1736 Crystal Ann Ave.	139-33-112-065	2007	Unevaluated
79	1740 Crystal Ann Ave.	139-33-112-066	2007	Unevaluated
80	1744 Crystal Ann Ave.	139-33-112-067	2007	Unevaluated
81	515 Desert Ln.	139-33-307-001	1984	Unevaluated
82	516 Desert Ln.	139-33-305-013	1967	Unevaluated
83	640 Desert Ln.	139-33-305-022	1972	Unevaluated
84	700 Desert Ln.	139-33-402-031	2003	Unevaluated
85	701 Desert Ln.	139-33-403-001	1978	Unevaluated
86	728 Desert Ln.	139-33-402-021	Vacant	Unevaluated
87	918 Desert Ln.	139-33-402-022	1985	Unevaluated
88	1107 Desert Ln.	162-04-501-002	1992	Unevaluated
89	No # Listed Discovery	139-33-501-016	Vacant	Unevaluated
90	No # Listed Discovery	139-33-501-018	Vacant	Unevaluated
91	No # Listed Discovery	139-33-501-019	Vacant	Unevaluated
92	No # Listed Discovery	139-33-501-021	Vacant	Unevaluated
93	No # Listed Discovery	139-33-510-005	Vacant	Unevaluated
94	No # Listed Discovery	139-33-510-007	Vacant	Unevaluated
95	1520 Ellis Ave.	162-04-512-001	1972	Unevaluated
96	1524 Ellis Ave.	162-04-512-002	1972	Unevaluated
97	1608 Ellis Ave.	162-04-510-006	Vacant	Unevaluated
98	1607 Fairfield Ave.	162-04-609-005	1974	Unevaluated
99	1701 Fairfield Ave.	162-04-710-066	1982	Unevaluated
100	1705 Fairfield Ave.	162-04-710-065	1982	Unevaluated
101	No # listed Grand Central Pky., South	139-27-410-005	Vacant	Unevaluated
102	209 Grand Central Pky., South	139-33-511-004	2005	Unevaluated

#	Street Address	APN	Built	Eligibility
103	445 Grand Central Pky., South	139-33-511-007	2005	Unevaluated
104	455 Grand Central Pky., South	139-33-610-022	2007	Unevaluated
105	475 Grand Central Pky., South	139-33-610-014	2006	Unevaluated
106	495 Grand Central Pky., South	139-33-610-023	2004	Unevaluated
107	511 Grand Central Pky., South	139-33-710-004	2003	Unevaluated
108	875 Grand Central Pky., South	139-33-710-003	2003	Unevaluated
109	1604 Hastings Ln.	139-33-402-027	Vacant	Unevaluated
110	1608 Hastings Ln.	139-33-402-026	Vacant	Unevaluated
111	1710 Highland Ave.	162-04-701-001	1975	Unevaluated
112	1711 Highland Ave.	162-04-702-001	1978	Unevaluated
113	1712 Highland Ave.	162-04-301-001	1979	Unevaluated
114	1716 Highland Ave.	162-04-301-002	1972	Unevaluated
115	1750 Highland Ave.	162-04-301-013	2000	Unevaluated
116	1914 Highland Ave.	162-04-301-004	1972	Unevaluated
117	1914 Highland Ave.	162-04-301-014	1972	Unevaluated
118	1916 Highland Ave.	162-04-301-005	1972	Unevaluated
119	1918 Highland Ave.	162-04-301-006	1979	Unevaluated
120	2090 Highland Ave.	162-04-301-010	1971	Unevaluated
121	2111 Highland Ave.	162-04-403-002	1973	Unevaluated
122	2765 Highland Dr.	162-09-201-001	1963/c. 2005	Unevaluated
123	2100 Highland Dr.	162-04-302-006	Vacant	Unevaluated
124	2200 Highland Dr.	162-04-403-004	1999	Unevaluated
125	2310 Highland Dr.	162-04-402-002	1981	Unevaluated
126	2400 Highland Dr.	162-04-402-004	1968	Unevaluated
127	2405 Highland Dr.	162-04-404-007	1968	Unevaluated
128	2412 Highland Dr.	162-04-402-006	1970	Unevaluated
129	2500 Highland Dr.	162-09-103-002	Vacant	Unevaluated
130	2550 Highland Dr.	162-09-110-019	1969	Unevaluated
131	2560 Highland Dr.	162-09-110-020	Vacant	Unevaluated
132	2575 Highland Dr.	162-09-110-018	1974	Unevaluated
133	2580 Highland Dr.	162-09-110-021	2006	Unevaluated
134	2609 Highland Dr.	162-09-110-015	1973	Unevaluated
135	2631 Highland Dr.	162-09-110-013	1998	Unevaluated
136	2635 Highland Dr.	162-09-110-012	1975	Unevaluated
137	2665 Highland Dr.	162-09-110-011	1974	Unevaluated
138	2850 Highland Dr.	162-09-110-035	Vacant	Unevaluated
139	2861 Highland Dr.	162-09-201-003	1991	Unevaluated

#	Street Address	APN	Built	Eligibility
140	2901 Highland Dr.	162-08-611-001	1978	Unevaluated
141	2901 Highland Dr.	162-08-611-002	1979	Unevaluated
142	2901 Highland Dr.	162-08-611-003	1979	Unevaluated
143	2901 Highland Dr.	162-08-611-004	1978	Unevaluated
144	2901 Highland Dr.	162-08-611-005	1978	Unevaluated
145	2901 Highland Dr.	162-08-611-006	1978	Unevaluated
146	2901 Highland Dr.	162-08-611-008	1978	Unevaluated
147	2901 Highland Dr.	162-08-611-013	1978	Unevaluated
148	2901 Highland Dr.	162-08-611-014	1979	Unevaluated
149	2901 Highland Dr.	162-08-611-015	1979	Unevaluated
150	2901 Highland Dr.	162-08-611-016	1979	Unevaluated
151	159 Imperial Ave., West	162-04-507-010	1970	Unevaluated
152	1600 Industrial Rd.	162-04-609-001	Vacant	Unevaluated
153	1601 Industrial Rd.	162-04-609-002	Vacant	Unevaluated
154	1700 Industrial Rd.	162-04-609-009	1985	Unevaluated
155	1719 Industrial Rd.	162-04-705-001	1975	Unevaluated
156	2466 Industrial Rd.	162-04-407-001	1972	Unevaluated
157	1001 Iron Horse Ct.	139-33-810-004	Vacant	Unevaluated
158	1003 Iron Horse Ct.	139-33-810-006	Vacant	Unevaluated
159	1023 Iron Horse Ct.	139-33-810-003	Vacant	Unevaluated
160	No # listed Iron Horse Ct.	139-33-810-005	Vacant	Unevaluated
161	1591 Kenyon Pl.	139-33-305-011	1996	Unevaluated
162	1700 Kenyon Pl.	139-33-304-016	2002	Unevaluated
163	240 Kiana Crystal Ct.	139-33-112-006	2007	Unevaluated
164	241 Kiana Crystal Ct.	139-33-112-001	2007	Unevaluated
165	244 Kiana Crystal Ct.	139-33-112-005	2007	Unevaluated
166	245 Kiana Crystal Ct.	139-33-112-002	2007	Unevaluated
167	248 Kiana Crystal Ct.	139-33-112-004	2007	Unevaluated
168	249 Kiana Crystal Ct.	139-33-112-003	2007	Unevaluated
169	No # listed Las Vegas	139-33-510-004	Vacant	Unevaluated
170	No # listed Las Vegas	139-33-701-004	Vacant	Unevaluated
171	No # listed Las Vegas	162-04-210-081	Vacant	Unevaluated
172	No # listed Las Vegas	162-04-402-005	Vacant	Unevaluated
173	No # listed Las Vegas	162-04-404-004	1996	Unevaluated
174	No # listed Las Vegas	162-04-404-005	1974	Unevaluated
175	No # listed Las Vegas	162-04-404-016	1985	Unevaluated
176	No # listed Las Vegas	162-04-405-001	1990	Unevaluated

#	Street Address	APN	Built	Eligibility
177	No # listed Las Vegas	162-04-503-001	1975	Unevaluated
178	No # listed Las Vegas	162-04-503-004	1969	Unevaluated
179	No # listed Las Vegas	162-04-506-005	Vacant	Unevaluated
180	No # listed Las Vegas	162-04-601-002	Vacant	Unevaluated
181	No # listed Las Vegas	162-04-601-006	2002	Unevaluated
182	No # listed Las Vegas	162-04-601-007	Vacant	Unevaluated
183	No # listed Las Vegas	162-04-607-021	1985	Unevaluated
184	No # listed Las Vegas	162-04-704-001	Vacant	Unevaluated
185	No # listed Las Vegas	162-08-502-012	Vacant	Unevaluated
186	No # listed Las Vegas	162-09-102-008	Vacant	Unevaluated
187	No # listed Las Vegas	162-09-102-010	Vacant	Unevaluated
188	525 Martin L. King Blvd., North	139-28-401-033	Vacant	Unevaluated
189	538 Martin L. King Blvd., S.	139-33-308-003	1973	Unevaluated
190	77 Martin L. King Blvd., S.	139-33-510-002	1991	Unevaluated
191	99 Martin L. King Blvd., S.	139-28-810-001	1993	Unevaluated
192	101 Martin L. King Blvd., S.	139-33-501-002	1973	Unevaluated
193	121 Martin L. King Blvd., S.	139-33-501-003	1966	Unevaluated
194	121 Martin L. King Blvd., S.	139-33-501-004	1966	Unevaluated
195	121 Martin L. King Blvd., S.	139-33-501-014	1966	Unevaluated
196	222 Martin L. King Blvd., S.	139-33-102-013	1986	Unevaluated
197	260 Martin L. King Blvd., S.	139-33-102-022	1992	Unevaluated
198	270 Martin L. King Blvd., S.	139-33-102-021	1990	Unevaluated
199	279 Martin L. King Blvd., S.	139-33-501-012	1990	Unevaluated
200	280 Martin L. King Blvd., S.	139-33-102-023	1996	Unevaluated
201	300 Martin L. King Blvd., S.	139-33-202-003	1993	Unevaluated
202	301 Martin L. King Blvd., S.	139-33-601-002	1991	Unevaluated
203	351 Martin L. King Blvd., S.	139-33-601-003	1982	Unevaluated
204	401 Martin L. King Blvd., S.	139-33-601-004	1973	Unevaluated
205	417 Martin L. King Blvd., S.	139-33-601-005	1989	Unevaluated
206	433 Martin L. King Blvd., S.	139-33-601-006	1985	Unevaluated
207	444 Martin L. King Blvd., S.	139-33-202-004	Vacant	Unevaluated
208	500 Martin L. King Blvd., S.	139-33-308-001	1982	Unevaluated
209	501 Martin L. King Blvd., S.	139-33-701-001	1980	Unevaluated
210	550 Martin L. King Blvd., S.	139-33-308-004	1979	Unevaluated
211	700 Martin L. King Blvd., S.	139-33-404-001	1978	Unevaluated
212	1124 Martin L. King Blvd., S.	162-04-501-006	1983	Unevaluated
213	1128 Martin L. King Blvd., S.	162-04-501-007	1999	Unevaluated

#	Street Address	APN	Built	Eligibility
214	1130 Martin L. King Blvd., S.	162-04-501-008	1979	Unevaluated
215	1200 Martin L. King Blvd., S.	162-04-501-009	1998	Unevaluated
216	1501 Martin L. King Blvd., S.	162-04-601-003	2002	Unevaluated
217	1501 Martin L. King Blvd., S.	162-04-601-005	2002	Unevaluated
218	No # listed Martin L. King Blvd., S.	139-28-801-012	Vacant	Unevaluated
219	No # listed Martin L. King Blvd., S.	139-28-801-013	Vacant	Unevaluated
220	No # listed Martin L. King Blvd., S.	139-33-202-005	Vacant	Unevaluated
221	No # listed Martin L. King Blvd., S.	139-33-501-010	Vacant	Unevaluated
222	No # listed Martin L. King Blvd., S.	162-04-601-008	Vacant	Unevaluated
223	No # Listed Martin L. King Blvd., S. (1501)	162-04-601-004	2002	Unevaluated
224	1200 Mercedes Cir.	162-04-511-001	1988	Unevaluated
225	1201 Mercedes Cir.	162-04-511-008	1992	Unevaluated
226	1204 Mercedes Cir.	162-04-511-002	1979	Unevaluated
227	1205 Mercedes Cir.	162-04-511-007	1978	Unevaluated
228	1208 Mercedes Cir.	162-04-511-003	1981	Unevaluated
229	1209 Mercedes Cir.	162-04-511-006	1986	Unevaluated
230	1212 Mercedes Cir.	162-04-511-004	1980	Unevaluated
231	1213 Mercedes Cir.	162-04-511-005	1995	Unevaluated
232	210 New York Ave., West	162-04-710-146	2005	Unevaluated
233	210 New York Ave., West	162-04-710-004	2005	Unevaluated
234	210 New York Ave., West	162-04-710-145	2005	Unevaluated
235	220 New York Ave., West	162-04-710-002	2005	Unevaluated
236	225 New York Ave., West	162-04-710-141	1979	Unevaluated
237	229 New York Ave., West	162-04-710-140	1979	Unevaluated
238	233 New York Ave., West	162-04-710-139	1979	Unevaluated
239	245 New York Ave., West	162-04-710-137	Vacant	Unevaluated
240	247 New York Ave., West	162-04-710-136	Vacant	Unevaluated
241	No # listed No Name Listed (formerly Shadow Lane)	139-33-406-005	2004-2007	Unevaluated
242	1501 Oakey Blvd, West	162-04-604-002	1984	Unevaluated
243	1543 Oakey Blvd, West	162-04-604-001	1984	Unevaluated
244	1550 Oakey Blvd, West	162-04-605-008	1968	Unevaluated
245	1601 Oakey Blvd, West	162-04-603-001	1998	Unevaluated
246	1810 Oakey Blvd, West	162-04-210-084	1979	Unevaluated
247	1806 Oakey, West	162-04-210-083	Vacant	Unevaluated
248	1320 Ormsby St.	162-04-115-003	1972	Unevaluated
249	1324 Ormsby St.	162-04-115-002	1972	Unevaluated

#	Street Address	APN	Built	Eligibility
250	1525 Pinto Ln.	139-33-305-021	1986	Unevaluated
251	2200 Rancho Dr., South	162-04-412-002	1980	Unevaluated
252	2250 Rancho Dr., South	162-04-412-003	2004	Unevaluated
253	2300 Rancho Dr., South	162-04-412-005	1967	Unevaluated
254	2320 Rancho Dr., South	162-04-412-004	1974	Unevaluated
255	2550 Rancho Dr., South	162-08-502-011	1975	Unevaluated
256	2750 Rancho Dr., South	162-08-602-005	Vacant	Unevaluated
257	216 Ransof Evans Ct.	139-33-112-032	2007	Unevaluated
258	217 Ransof Evans Ct.	139-33-112-033	2007	Unevaluated
259	220 Ransof Evans Ct.	139-33-112-031	2007	Unevaluated
260	221 Ransof Evans Ct.	139-33-112-034	2007	Unevaluated
261	224 Ransof Evans Ct.	139-33-112-030	2007	Unevaluated
262	225 Ransof Evans Ct.	139-33-112-035	2007	Unevaluated
263	228 Ransof Evans Ct.	139-33-112-029	2007	Unevaluated
264	229 Ransof Evans Ct.	139-33-112-036	2007	Unevaluated
265	232 Ransof Evans Ct.	139-33-112-028	2007	Unevaluated
266	233 Ransof Evans Ct.	139-33-112-037	2007	Unevaluated
267	236 Ransof Evans Ct.	139-33-112-027	2007	Unevaluated
268	237 Ransof Evans Ct.	139-33-112-038	2007	Unevaluated
269	240 Ransof Evans Ct.	139-33-112-026	2007	Unevaluated
270	2200 Red Oak Ave.	162-09-201-002	1983	Unevaluated
271	1217 Richard Ct.	162-04-512-006	1970	Unevaluated
272	1221 Richard Ct.	162-04-512-007	1972	Unevaluated
273	1225 Richard Ct.	162-04-512-008	1972	Unevaluated
274	1301 Richard Ct.	162-04-512-009	1972	Unevaluated
275	1309 Richard Ct.	162-04-512-011	1972	Unevaluated
276	1305 Richard Ct. (1205)	162-04-512-010	1972	Unevaluated
277	1501 Sahara	162-09-102-009	1979	Unevaluated
278	2411 Sahara	162-08-502-007	1977	Unevaluated
279	2411 Sahara	162-08-502-008	1990	Unevaluated
280	2411 Sahara	162-08-502-009	1991	Unevaluated
281	2411 Sahara	162-08-502-010	1977	Unevaluated
282	2401 Sahara Ave., West	162-08-502-003	Vacant	Unevaluated
283	2411 Sahara Ave., West	162-08-502-006	1977	Unevaluated
284	2501 Sahara Ave., West	162-08-502-002	1988	Unevaluated
285	1516 Scotland Ln.	162-04-404-015	1977	Unevaluated

#	Street Address	APN	Built	Eligibility
286	1518 Scotland Ln.	162-04-404-014	1975	Unevaluated
287	501 Shadow Ln.	139-33-304-001	1978	Unevaluated
288	515 Shadow Ln.	139-33-305-023	1981	Unevaluated
289	701 Shadow Ln.	139-33-402-001	1980	Unevaluated
290	803 Shadow Ln.	139-33-402-032	2003	Unevaluated
291	209 Shy Dandelion St.	139-33-112-085	2007	Unevaluated
292	213 Shy Dandelion St.	139-33-112-086	2007	Unevaluated
293	216 Shy Dandelion St.	139-33-112-056	2007	Unevaluated
294	217 Shy Dandelion St.	139-33-112-087	2007	Unevaluated
295	220 Shy Dandelion St.	139-33-112-055	2007	Unevaluated
296	221 Shy Dandelion St.	139-33-112-088	2007	Unevaluated
297	224 Shy Dandelion St.	139-33-112-054	2007	Unevaluated
298	225 Shy Dandelion St.	139-33-112-089	2007	Unevaluated
299	228 Shy Dandelion St.	139-33-112-053	2007	Unevaluated
300	229 Shy Dandelion St.	139-33-112-090	2007	Unevaluated
301	232 Shy Dandelion St.	139-33-112-052	2007	Unevaluated
302	233 Shy Dandelion St.	139-33-112-091	2007	Unevaluated
303	236 Shy Dandelion St.	139-33-112-051	2007	Unevaluated
304	237 Shy Dandelion St.	139-33-112-092	2007	Unevaluated
305	1701 Silver Ave.	162-04-210-082	1979	Unevaluated
306	1720 Silver Ave.	162-04-210-057	1977	Unevaluated
307	1800 Silver Ave.	162-04-210-058	1977	Unevaluated
308	209 Tabitha Lila St.	139-33-112-068	2007	Unevaluated
309	213 Tabitha Lila St.	139-33-112-069	2007	Unevaluated
310	216 Tabitha Lila St.	139-33-112-081	2007	Unevaluated
311	217 Tabitha Lila St.	139-33-112-070	2007	Unevaluated
312	220 Tabitha Lila St.	139-33-112-080	2007	Unevaluated
313	221 Tabitha Lila St.	139-33-112-071	2007	Unevaluated
314	224 Tabitha Lila St.	139-33-112-079	2007	Unevaluated
315	225 Tabitha Lila St.	139-33-112-072	2007	Unevaluated
316	228 Tabitha Lila St.	139-33-112-078	2007	Unevaluated
317	229 Tabitha Lila St.	139-33-112-073	2007	Unevaluated
318	233 Tabitha Lila St.	139-33-112-074	2007	Unevaluated
319	1645 Travis Jason Ave.	139-33-112-025	2007	Unevaluated
320	1649 Travis Jason Ave.	139-33-112-024	2007	Unevaluated
321	1653 Travis Jason Ave.	139-33-112-023	2007	Unevaluated
322	1657 Travis Jason Ave.	139-33-112-022	2007	Unevaluated

#	Street Address	APN	Built	Eligibility
323	1661 Travis Jason Ave.	139-33-112-021	2007	Unevaluated
324	1665 Travis Jason Ave.	139-33-112-020	2007	Unevaluated
325	1689 Travis Jason Ave.	139-33-112-019	2007	Unevaluated
326	1673 Travis Jason Ave.	139-33-112-018	2007	Unevaluated
327	1677 Travis Jason Ave.	139-33-112-017	2007	Unevaluated
328	1681 Travis Jason Ave.	139-33-112-016	2007	Unevaluated
329	1705 Travis Jason Ave.	139-33-112-015	2007	Unevaluated
330	1709 Travis Jason Ave.	139-33-112-014	2007	Unevaluated
331	1713 Travis Jason Ave.	139-33-112-013	2007	Unevaluated
332	1717 Travis Jason Ave.	139-33-112-012	2007	Unevaluated
333	1721 Travis Jason Ave.	139-33-112-011	2007	Unevaluated
334	1724 Travis Jason Ave.	139-33-112-077	2007	Unevaluated
335	1725 Travis Jason Ave.	139-33-112-010	2007	Unevaluated
336	1728 Travis Jason Ave.	139-33-112-076	2007	Unevaluated
337	1729 Travis Jason Ave.	139-33-112-009	2007	Unevaluated
338	1732 Travis Jason Ave.	139-33-112-075	2007	Unevaluated
339	1733 Travis Jason Ave.	139-33-112-008	2007	Unevaluated
340	1737 Travis Jason Ave.	139-33-112-007	2007	Unevaluated
341	310 Utah Ave., West	162-04-607-008	1979	Unevaluated
342	1650 Waldman Ave.	162-04-115-001	1968	Unevaluated
343	200 Wall St.	162-04-513-008	Vacant	Unevaluated
344	200 Wall St.	162-04-513-009	Vacant	Unevaluated
345	300 Wall St.	162-04-513-007	Vacant	Unevaluated
346	307 Wall St.	162-04-513-010	Vacant	Unevaluated
347	309 Wall St.	162-04-513-012	1979	Unevaluated
348	310 Wall St.	162-04-513-006	Vacant	Unevaluated
349	313 Wall St.	162-04-513-013	Vacant	Unevaluated
350	316 Wall St.	162-04-513-005	Vacant	Unevaluated
351	317 Wall St.	162-04-513-014	Vacant	Unevaluated
352	319 Wall St.	162-04-513-015	Vacant	Unevaluated
353	320 Wall St.	162-04-513-004	Vacant	Unevaluated
354	322 Wall St.	162-04-513-003	Vacant	Unevaluated
355	No # listed Wall St.	162-04-513-011	Vacant	Unevaluated
356	1200 Western Ave.	162-04-505-002	1968	Unevaluated
357	1205 Western Ave.	162-04-505-001	Vacant	Unevaluated
358	1224 Western Ave.	162-04-503-002	1976	Unevaluated
359	1227 Western Ave.	162-04-505-003	Vacant	Unevaluated

#	Street Address	APN	Built	Eligibility
360	1230 Western Ave.	162-04-503-003	1977	Unevaluated
361	1509 Western Ave.	162-04-605-005	1972	Unevaluated
362	1700 Western Ave.	162-04-702-003	1979	Unevaluated
363	1731 Western Ave.	162-04-703-003	1995	Unevaluated
364	1801 Western Ave.	162-04-703-004	1966	Unevaluated
365	1821 Western Ave.	162-04-711-003	2006	Unevaluated
366	1831 Western Ave.	162-04-711-004	2006	Unevaluated
367	1841 Western Ave.	162-04-711-005	2006	Unevaluated
368	1851 Western Ave.	162-04-711-002	2006	Unevaluated
369	1930 Western Ave.	162-04-302-003	1969	Unevaluated
370	2000 Western Ave.	162-04-302-004	1970	Unevaluated
371	2001 Western Ave.	162-04-703-010	1984	Unevaluated
372	2009 Western Ave.	162-04-703-011	1981	Unevaluated
373	2010 Western Ave.	162-04-302-005	1973	Unevaluated
374	2121 Western Ave.	162-04-406-001	1979	Unevaluated
375	2121 Western Ave.	162-04-406-002	1978	Unevaluated
376	2124 Western Ave.	162-04-403-003	1973	Unevaluated
377	2125 Western Ave.	162-04-406-004	1967	Unevaluated
378	2211 Western Ave.	162-04-406-006	1974	Unevaluated
379	2319 Western Ave.	162-04-406-007	1984	Unevaluated
380	2319 Western Ave.	162-04-406-008	1985	Unevaluated
381	2325 Western Ave.	162-04-406-009	1974	Unevaluated
382	2400 Western Ave.	162-04-404-006	1975	Unevaluated
383	2401 Western Ave.	162-04-406-010	1975	Unevaluated
384	2404 Western Ave.	162-04-404-008	1979	Unevaluated
385	2411 Western Ave.	162-04-406-011	1984	Unevaluated
386	2412 Western Ave.	162-04-404-012	1966	Unevaluated
387	2424 Western Ave.	162-04-404-017	1977	Unevaluated
388	2441 Western Ave.	162-04-406-012	1980	Unevaluated
389	2500 Western Ave.	162-09-102-004	1978	Unevaluated
390	No # listed Western Ave.	162-04-703-001	Vacant	Unevaluated
391	No # listed Westwood Dr.	162-04-605-003	Vacant	Unevaluated
392	2501 Westwood Dr.	162-09-110-042	Vacant	Unevaluated
393	2601 Westwood Dr.	162-09-102-005	1979	Unevaluated
394	2602 Westwood Dr.	162-09-110-005	1984	Unevaluated
395	2604 Westwood Dr.	162-09-110-006	1968	Unevaluated
396	2614 Westwood Dr.	162-09-110-007	1968	Unevaluated

#	Street Address	APN	Built	Eligibility
397	2624 Westwood Dr.	162-09-110-008	1969	Unevaluated
398	2634 Westwood Dr.	162-09-110-009	1979	Unevaluated
399	2650 Westwood Dr.	162-09-110-010	1970	Unevaluated
400	2651 Westwood Dr.	162-09-102-006	1979	Unevaluated
401	2701 Westwood Dr.	162-09-102-002	1995	Unevaluated
402	2801 Westwood Dr.	162-08-604-001	2003	Unevaluated
403	2951 Westwood Dr.	162-08-703-001	1969	Unevaluated
404	2953 Westwood Dr.	162-08-703-002	1977	Unevaluated
405	2955 Westwood Dr.	162-08-703-003	1972	Unevaluated
406	2959 Westwood Dr.	162-08-703-004	1972	Unevaluated
407	3001 Westwood Dr.	162-08-703-006	1976	Unevaluated
408	3005 Westwood Dr.	162-08-703-007	1973	Unevaluated
409	3015 Westwood Dr.	162-08-703-008	1974	Unevaluated
410	3035 Westwood Dr.	162-08-703-010	1973	Unevaluated
411	3043 Westwood Dr.	162-08-703-011	1977	Unevaluated
412	3101 Westwood Dr.	162-08-703-012	1985	Unevaluated
413	3105 Westwood Dr.	162-08-802-001	1976	Unevaluated
414	No # listed Westwood Dr.	162-08-611-007	Vacant	Unevaluated
415	No # listed Westwood Dr.	162-08-703-005	Vacant	Unevaluated
416	No # listed Westwood Dr. (3061)	162-08-703-009	2002	Unevaluated
417	No # listed Westwood Dr.	162-08-604-002	Vacant	Unevaluated
418	412 Wilson Ave., West	139-27-310-089	1986	Unevaluated
419	2501 Wyandotte St.	162-08-505-004	1970	Unevaluated
420	2631 Wyandotte St.	162-08-602-002	1971	Unevaluated
421	220 Wyoming Ave., West	162-04-608-012	1979	Unevaluated
422	311 Wyoming Ave., West	162-04-608-004	Vacant	Unevaluated

The SHPO notes the following twenty-one (21) properties were previously surveyed for federal undertakings and at that time were left either 'unevaluated' or an eligibility decision was made. Based on the findings of the Project Neon report and comparison with the older survey information, the SHPO notes those properties in bold whose determinations have changed. Therefore, the SHPO concurs with FHWA's determinations of eligibility for the four (4) properties in bold:

#	Street Address	APN	Built	Eligibility
1	600 Bonanza Rd., West	139-27-310-073	1956	Not Eligible
2	715 Bonanza Rd., West	139-27-401-001	1950	Not Eligible
3	831 Bonanza Rd., West	139-28-801-010	1954	Not Eligible

#	Street Address	APN	Built	Eligibility
4	835 Bonanza Rd., West	139-28-801- 009	1955	Not Eligible
5	845 Bonanza Rd., West	139-28-801- 008	1957	Not Eligible
6	855 Bonanza Rd., West	139-28-801- 007	1956	Not Eligible
7	855 Bonanza Rd., West	139-28-801- 015	1977	Unevaluated
8	1001 Bonanza Rd., West	139-28-801- 003	1963	Eligible A
9	1211 Bonanza Rd., West	139-28-801- 016	1970	Unevaluated
10	No # listed Bonanza Rd., West	139-28-801- 011	Vacant	Unevaluated
11	No # listed Bonanza Rd., West	139-28-801- 018	1958	Not Eligible
12	No # listed Bonanza Rd., West	139-27-310- 072	Vacant	Unevaluated
13	9 Charleston Blvd, West	162-03-110- 109	1942	Eligible-A, B, & C (Previously surveyed in 2007 and had been left 'unevaluated.')
14	13 Charleston Blvd, West	162-03-110- 110	1942	Eligible-A&C (Previously surveyed in 2007 and had been left 'unevaluated.')
15	25 Charleston Blvd, West	162-03-105- 001	c. 1942/2002	Not Eligible (Previously surveyed in 2007 and had been left 'unevaluated.')
16	1022 Commerce St., South	139-33-801- 018	Vacant	Unevaluated
17	500 Grand Central Pky., South	139-33-710- 002	1995	Unevaluated
18	1100 Main St., South	162-03-110- 108	1987	Not Eligible (Previously surveyed in 2007 and had been left 'unevaluated.')
19	716 Mesquite Ave., West	139-27-401- 005	1955	Not Eligible
20	720 Mesquite Ave., West	139-27-401- 004	1954	Not Eligible
21	800 Mesquite Ave., West	139-28-802- 001	1954	Not Eligible

The SHPO interpreted the following parcels as 'associated' and their eligibility status is linked with their parent parcel (see notes field):

#	Street Address	APN	Built	Notes (parent parcel-reason)
1	601 Bonanza Rd., West	139-27-401-006	2007	Associated w/APN: 139-27-401-002 (Nevada Ready Mix Corp.-land use)
2	305 Charleston Blvd., West	162-04-504-003	1958	Associated w/303 W. Charleston (APN: 162-04-504-004; Over-lapping Bldg.)
3	No # listed Industrial Rd.	162-04-606-004	Mostly vacant	Associated w/1550 Industrial Way (APN: 162-04-606-005; overlapping bldg.)
4	No # listed Industrial Rd.	162-04-606-003	Vacant	Associated w/1550 Industrial Way (APN:162-04-606-005; land use-bus parking)
5	No # listed Mesquite	139-27-401-007	Vacant	Associated w/APN: 139-27-401-002 (Nevada Ready Mix Corp.-land use)
6	1602 Oakey Blvd., West	162-04-602-008	1994	Associated w/1604 W. Oakley Blvd. (APN: 162-04-602-009; Overlapping Bldg.)
7	1422 Western Ave.	162-04-602-005	0 (per assessor)	Associated w/APN: 162-04-602-006, same address (Overlapping bldg.)
8	1909 Western Ave.	162-04-703-008	1960	Associated w/1901 Western Ave. (APN: 162-04-703-007-Overlapping Bldg.)
9	2120 Western Ave.	162-04-403-001	1963	Associated w/2112 Western Ave. (APN: 162-04-302-007; overlapping bldg.)
10	221 Wyoming Ave., West	162-04-609-011	1961	Associated w/APN: 162-04-609-003 (overlapping bldg. & bldg. material storage)
11	221 Wyoming Ave., West	162-04-609-004	Vacant	Associated w/APN: 162-04-609-003 (land use-bldg. material storage)
12	221 Wyoming Ave., West	162-04-609-012	Vacant	Associated w/APN: 162-04-609-003 (land use-bldg. material storage)

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A. Abdalla
September 12, 2008
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In summary, of the 799 properties in the APE, the SHPO concurs that 99 are 'eligible', 245 are 'not eligible', 422 were left 'unevaluated', 21 were 'previously surveyed', 12 were 'associated' with another parcel, and there is 1 historic district (Buena Vista Subdivision) with 14 'contributing' and '4 non-contributing' resources.

The SHPO concurs with FHWA's determination of 'Adverse Effect' for the subject undertaking and awaits a draft memorandum of agreement (MOA) regarding the project. Please contact Ms. Alice Baldrice, Deputy SHPO at 775-684-3444 if you have any questions regarding the MOA process or to set up a meeting to discuss.

If you have questions regarding the contents of this correspondence, please contact Rebecca R. Ossa, Architectural Historian, at 775-684-3441 or via email at rossa@nevadaculture.org.

Sincerely,



Alice M. Baldrice, Deputy
State Historic Preservation Officer

cc: C. Cliff Creger, NDOT

Appendix B

**Agency and Public Comments on the Final EIS,
and the Responses to Comments**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

July 16, 2010

Mr. Abdelmoez Abdalla
Federal Highway Administration
705 North Plaza Street, Suite 220
Carson City, Nevada 89701

Subject: Final Environmental Impact Statement for the I-15 Corridor Improvements and Local Arterial Improvements (CEQ #20100211)

Dear Mr. Abdalla:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document 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. Our detailed comments are enclosed.

EPA reviewed the Draft Environmental Impact Statement (DEIS), and provided comments to the Federal Highway Administration (FHWA) and Nevada Department of Transportation (NDOT) on November 6, 2009. We rated the DEIS as Environmental Concerns-Insufficient Information (EC-2) based on concerns about the project's impacts to environmental justice communities due to residential relocation and noise impacts, as well as concerns about air quality, and near-roadway health impacts to residents that will be in close proximity to the highway. We commend FHWA and NDOT for the commitments for additional noise barriers as well as interest in applying green design measures. However, we have remaining concerns about relocation-related impacts, environmental justice impacts, and air quality impacts of the project.

1 In light of the project's relocation impacts to an estimated 850 people in 345 households, EPA remains concerned about impacted residents. EPA continues to recommend that FHWA and NDOT outreach thoroughly to potential displacees and revisit the conclusion that no environmental justice impacts will occur as a result of the project. Interviews with displaced residents can provide a basis for meaningful mitigation measures. We also recommend consulting neighborhood groups on potential mitigation measures to reduce effects on displaced residents. We recommend including further commitments to mitigate environmental justice impacts in the Record of Decision (ROD).

2 EPA continues to believe the project may be a Project of Air Quality Concern, and we recommend consultation with the Regional Transportation Commission of Southern Nevada and EPA air quality staff regarding this issue prior to completing the ROD. We also continue to recommend that FHWA and NDOT commit to specific construction emissions mitigation

2

measures and provide, through the enclosed detailed comments, additional supporting information with our continuing recommendations that mobile source air toxics impacts be assessed and mitigated.

We appreciate the opportunity to review this Final EIS. When the ROD is signed, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at 415-947-4161, or Chris Ganson of my staff at 415-947-4121 or ganson.chris@epa.gov.

Sincerely,



Connell Dunning, Transportation Team Leader
Environmental Review Office

Attachments: EPA's Detailed Comments
Green Highway Brochure

cc: Steve Cooke, Nevada Department of Transportation
Lewis Wallenmeyer, Clark County Air Quality Management District
Carl Rowe, Housing Authority of the City of Las Vegas

1. The detailed responses to USEPA's concerns about coordinating with residents displaced by Project NEON and the Final EIS' conclusions about environmental justice are addressed in responses 3 and 5, respectively.
2. The detailed response to USEPA's contention that Project NEON may be a Project of Air Quality Concern is found in response 7. The recommendation that FHWA and NDOT commit to specific construction emissions mitigation measures and assess and mitigate mobile source air toxics impacts is addressed in responses 8 through 11.

Displacement of Residents

EPA understands that the proposed project will impact and displace over 800 residents as proposed. EPA appreciates Federal Highway Administration (FHWA) and Nevada Department of Transportation's (NDOT) commitments to both 1) relocation assistance for owners, renters, and low-income residents to housing within their financial means and 2) interviews with all households in rental units. EPA also appreciates FHWA and NDOT's recognition of the potential impacts on community cohesion in the residences along Desert Lane. The Final Environmental Impact Statement (FEIS) includes a commitment that any cohesion concerns will be addressed and efforts will be made to minimize the impacts of relocation during FHWA and NDOT's meetings with impacted renters to discuss relocation benefits. EPA agrees that individual, one-on-one meetings are warranted given the great impact that residences will be subjected to.

While we understand the inability to identify specific locations to which displaced residents will be relocated, we encourage FHWA and NDOT to work both with local housing agencies and community groups to ensure relocation to decent, safe, and sanitary replacement housing occurs. This is particularly important, given that the alternatives being considered for the future expansion of I-515, directly to the east of this project, may also result in the disruption of hundreds of residences. We continue to recommend that NDOT go above and beyond the baseline Uniform Relocation Act requirements when relocating residents in light of cumulative displacements and impacts to cohesion that have, and will, in the future, be a direct result of NDOT and FHWA highway expansion.

EPA appreciates the additional information on project phasing and vacancy rates in the area, and the FHWA and NDOT commitment to continue to monitor changes in the local housing market during each phase of proposed construction to insure there is sufficient (and affordable) housing to accommodate those that will be relocated by the I-15 improvements.

Recommendations:

- 3 [• We continue to recommend that FHWA and NDOT go above and beyond the baseline Uniform Relocation Act requirements when relocating residents. For example, we encourage you to work with the community to determine mitigation measures for displacement.
- 4 [• We recommend that the Record of Decision (ROD) include a commitment to interview all potential displacees and to outreach to community groups, to address potential issues of community cohesion and develop meaningful mitigation measures.

Environmental Justice

As stated in our comments on the Draft EIS, Executive Order 12898 directs federal

3. To clarify the recommendation in the first bullet on page 3, NDOT is assuming that the relocated residents of concern would be those protected by the environmental justice executive order. Of the project's 339 potential residential displacements, 220 would be minority occupied units identified as the environmental justice population of concern. See Section 3.3.1 of the FEIS for more information on how the project's environmental justice population was identified and Table 3-7 for how the number of minority occupied units was determined. The remaining 119 potential residential displacements would not be covered under the environmental justice executive order, and therefore, mitigation for their residential relocations would be the provisions of the Uniform Relocation Act.

The text in Section 6.3.1 of the Record of Decision (ROD) describes the actions NDOT will take above and beyond the requirements of the Uniform Relocation Act in relocating residents. Briefly summarized, the additional measures NDOT will take include:

- Coordinating with the City of Las Vegas Neighborhood Services Department, the appropriate City Council member, church leaders, and the Latin Chamber of Commerce prior to beginning real estate negotiations to deepen NDOT's understanding of the project's potential impacts to community cohesion and relocation needs beyond obtaining a new residence.
 - Coordinating with the Department of Housing and Urban Development (HUD), the Southern Nevada Regional Housing Authority (SNRHA), and the Nevada State Housing Division (NSHD) to ensure that families relocated by Project NEON have information about the widest range of housing opportunities and other programs that HUD, SNRHA, and NSHD offer to qualifying families during the project's real estate phases.
4. NDOT's commitment to interview all property owners and renters during the real estate acquisition phase is found in the first bullet under Section 6.3.2 of this document. The outreach activities NDOT will be involved in with residents relocated by the project are found in Section 6.3.1. It should be noted that no residential displacements are anticipated during Phase 1 of the project (2012).

agencies to make achieving environmental justice part of their missions by identifying and addressing, as appropriate, disproportionately high adverse human health or environmental effects of their activities on minority and low-income populations. The United States Department of Transportation defines three fundamental EJ principles for the Federal Highway Administration and the Federal Transit Administration as follows:

"1) To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations. 2) To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process. 3) To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations."
("Overview of Transportation and Environmental Justice", U.S. DOT)

Data in the FEIS indicate that a number of neighborhoods that would be impacted by the project are home to disproportionately low-income and minority populations. The FEIS provides a conclusion that the proposed project will cause no environmental justice impacts, due to compensating benefits in the form of improved housing for displacees, specifically that differences in rent will be paid during a period lasting 42 months. The offering of compensating benefits appears to be one mitigating measure available to offset environmental justice impacts that will occur, based on information presented in the FEIS. Therefore, EPA believes that, FHWA and NDOT should revisit the conclusion that "no environmental justice impacts will occur". The ROD should clearly state that environmental justice impacts will occur and should identify compensating benefits as a mitigation measure to reduce impacts.

Recommendations:

- 5 [• Revisit the conclusion that no environmental justice impacts will occur as a result of the proposed project. EPA recommends identifying compensating benefits as one measure of mitigation to reduce what appear to be environmental justice impacts as presented in the FEIS. The ROD should also identify additional mitigating measures.
- 6 [• EPA recommends working with the affected community to define meaningful mitigation measures.

Air Quality

Air Quality Monitoring Data and Hot Spot Analyses

EPA appreciates the inclusion of the latest available Maximum Measured Pollutant Concentration data. However, we continue to question the analysis presented in the FEIS to arrive at the conclusion that this is not a Project of Air Quality Concern (POAQC). Air quality impacts from the project are proportional to (among other factors) the *number* of vehicles and *number* of diesel vehicles on the roadway, not the *percentage* of diesel vehicles among the total number of vehicles.

5. The Final EIS does not conclude that no environmental justice impacts will occur as result of the project. At the bottom of page 3-20, it states that “Approximately 2.5 times more minority occupied residential units would be displaced by the preferred alternative than non-minority occupied units.” On page 3-23, it states “Given the adverse impacts on the environmental justice community, Step 4 will be completed to determine whether Project NEON has disproportionately high and adverse impacts.” The position taken in the Section 3.3.4 of the FEIS is that the project does not have disproportionately high and adverse effects on the environmental justice population after taking the project’s offsetting benefits into account. The project’s offsetting benefits are described on pages 3-23 through 3-25 of the Final EIS and include, among other things, the opportunity to move from renter to homeowner, relocate to a larger dwelling, and move to a neighborhood with greater community cohesion. The additional mitigation measures NDOT is committing to in the ROD are discussed in Sections 6.3.1 and 6.3.2. NDOT acknowledges the possibility of mitigation measures other than those discussed in this document being uncovered during the community interviews and interviews with affected residents as described in Section 6.3.1. NDOT will consider additional opportunities to assist the environmental justice population at that time.
6. The outreach activities NDOT will conduct with the residents relocated by Project NEON are described in the response to comment 3 and described in more detail in Section 6.3.1 of this ROD. NDOT will continue to look for opportunities to identify other measures in each phase of project development. The coordination activities with HUD, SNRHA, and NSHD described in Section 6.3.1 were identified during a meeting NDOT and FHWA held with those agencies on August 9, 2010. The purpose of the meeting was to obtain the housing agencies’ input on the ability of subsidized housing to accommodate Project NEON’s relocated residents and to learn more about other programs the agencies offer that could assist residents in moving to a new dwelling. The representatives from HUD and SNRHA stated that their agencies could absorb all 308 relocations proposed in Phase 2 of Project NEON if necessary.

We note that the first criterion listed for POAQC status is “New or expanded highway projects that have a significant number of or significant increase in diesel vehicles.” To inform this criteria, the FEIS states that the percentage of diesel vehicles will remain low. However, given that overall Average Annual Daily Traffic (AADT) will increase, it does not necessarily follow that the number of diesel vehicles will remain low. Page 3-69 of the FEIS states that “...AADT along most segments of the Project Neon corridor will exceed 200,000 vehicles per day.” At those volumes, the reported 4 to 5 percent diesel vehicle share could exceed a threshold of 10,000 diesel vehicles per day. Also, importantly, the FEIS identifies the presence of sensitive receptors nearby the roadway (residences, daycare facilities, and a church). Therefore we continue to believe the project may qualify as a Project of Air Quality Concern.

Recommendation:

- Consult with the Regional Transportation Commission of Southern Nevada and EPA to make a final determination whether this is a Project of Air Quality Concern. Include documentation, and a summary of the ultimate conclusion following coordination with Regional Transportation Commission and EPA, in the ROD along with the results of any additional analyses that may be warranted.

Construction Impacts

We appreciate NDOT stating the intent to use existing industrial land uses east of I-15 for construction staging areas in order to locate them as far away from residential areas west of I-15 as possible. We recommend that this intention be included in the ROD.

EPA agrees with NDOT and FHWA statement that “Off-road diesel engines can contribute significantly to the levels of particulate matter and nitrogen oxides in the air.” EPA commends FHWA and NDOT for listing in response to our comment strategies to reduce construction emissions, including reducing idle times, properly maintaining equipment, using clean fuels, and retrofitting diesel engines.

Recommendation:

- EPA recommends that FHWA and NDOT include the following additional construction mitigation measures (as presented in the Response to Comments) as well as others that will reduce air quality impacts, in the ROD:
 - Reducing idle times, properly maintaining equipment, using cleaner fuel, and retrofitting diesel engines with diesel emission control devices. By reducing unnecessary idling at the construction site, emissions will be reduced and fuel will be saved.
 - Proper maintenance of the diesel engine will also allow the engine to perform better and emit less pollution by burning fuel more efficiently.
 - Switching to fuels that contain lower levels of sulfur reduces particulate matter. Using ultra-low sulfur diesel does not require equipment changes or modification. Using fuels that contain a lower level of sulfur also tend to increase the effectiveness of retrofit technologies.

- Retrofitting off-road construction equipment with diesel emission control devices can reduce particulate matter, nitrogen oxides, carbon monoxide, or hydrocarbons, in addition to other air pollutants.
- Diesel particulate filters can be used to physically trap and oxidize particulate matter in the exhaust stream and diesel oxidation catalysts can be used to oxidize pollutants in the exhaust stream (U.S. EPA, 2008).
- We recommend that FHWA and NDOT include this suite of potential mitigation measures in the future specifications for the construction contract for these projects.

Mobile Source Air Toxics (MSAT)

EPA appreciates the following statement provided in the FEIS Response to Comments, “FHWA agrees that mobile source air toxics may potentially impact the project area.” However, we disagree with the conclusion stated in the Response to Comments that, “FHWA does not feel that additional MSAT analysis would be beneficial for decision-making and is not warranted”. Given the evidence supporting potential health impacts associated with near-roadway exposures, EPA continues to recommend that FHWA and NDOT assess potential effects and commit to measures to reduce health impacts and we provide the following responses to FHWA following our review of the Response to Comments in the FEIS.

EPA comments on the DEIS cited the recent National Cooperative Highway Research Program (NCHRP) report entitled “Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process” (NCHRP 25-25 Task 18, March 2007). Although FHWA discounts the application of this report to the analysis of mobile source air toxics analyses, EPA continues to believe that the above-stated report provides a useful approach for informing the public and decision-makers about potential MSAT impacts through the NEPA process. The report reflects a wide scientific consensus on the types of analysis suitable for assessing air quality from roadway emission sources. EPA’s Air Toxic Risk Assessment (ATRA) Reference Library (http://www.epa.gov/ttn/fera/risk_atra_main.html) provides parallel recommendations to the NCHRP report for modeling and risk assessment.

Epidemiological Studies Establish Support for Health Hazard

The Response to Comments states that epidemiological studies “suffer from the limitation that they cannot by their very nature establish causality. They may indicate statistical associations, but other confounding factors may be missed and may represent the true cause of the impact.” We note that the presence of confounding factors does not invalidate epidemiologic investigation as a means of establishing the presence of a health hazard, nor its use in assessing population risks. Epidemiologists have developed numerous formal approaches for assessing causality using epidemiologic information and other factors. Most commonly, the Bradford Hill criteria (<http://www.edwardtufte.com/tufte/hill>) are regarded as a means of addressing evidence. These do not make up a “checklist,” but a way to systematically evaluate evidence, including observational (epidemiologic) and biological (toxicological) information.

Attainment Status of Surrounding Airshed Not Likely to Confound Analyses

The Response to Comments states that FHWA has concerns about reaching conclusions

7. On August 3, 2010, NDOT held a conference call with the Regional Transportation Commission of Southern Nevada (RTC), the Clark County Department of Air Quality and Environmental Management (DAQEM), and the FHWA to discuss concerns regarding Project NEON and whether or not it should be considered a Project of Air Quality Concern for PM10. DAQEM had previously submitted a letter regarding the project on July 12, 2010 (Appendix B) and did not provide any additional input. Following the conference call, input was provided by RTC in a letter dated September 13, 2010 (Appendix B). Based on input from USEPA, a PM10 Conformity Hot Spot Analysis Form was prepared for the project and distributed to USEPA, RTC, NDOT, DAQEM, and FHWA on October 18, 2010 with additional follow-up documentation submitted to USEPA on October 21, 2010. On October 21, 2010, USEPA responded that circulation and review of the documents met their needs for interagency consultation and could serve for the hot spot analysis to complete the project-level conformity requirements for the project. The PM10 documentation for Project NEON is included in Appendix B.
8. NDOT reevaluated the list of potential construction-related air quality mitigation measures in the response to comment 17 in the FEIS and identified the following measures that it would commit to in the ROD:
 - Use appropriate construction staging locations that eliminate or minimize conflict with residential neighborhoods while reducing the potential for excessive travel to and from the work site at the expense of air quality;
 - Limit idle times of diesel related construction equipment per federal, state and local laws, regulations and ordinances; and
 - Use ultra low sulfur diesel fuel in all diesel powered construction equipment.

regarding health impacts from highway emissions based on proximity studies in areas known to exceed ambient air quality standards, such as the recent study by Dr. James Gauderman, et al., entitled “Effect of Exposure to Traffic on Lung development from 10 to 18 Years of Age: A Cohort Study”. Epidemiologic studies of traffic-related health generally use people in the same urban area as a control group, all of whom are likely to live in the same airshed. As such, the possibility of confounding as a result of attainment status is minimal. There are numerous studies in attainment areas, including: Kim et al. (2004) Traffic-related air pollution near busy roads. *The East Bay Children’s Respiratory Health Study*. *American Journal of Respiratory and Critical Care Medicine* 170: 520-526.

Sources Supporting Conclusions Regarding Dispersion Modeling and Mobile Source Air Pollution-Health Impacts Analyses

The Response to Comments states that “well-documented uncertainties are associated with dispersion modeling”. Based on a review of the scientific literature, EPA believes that this claim is not supportable. We provide the following sources regarding dispersion modeling

- Venkatram, A.; Isakov, V.; Seila, R.; Baldauf, R. (2009) Modeling the impacts of traffic emissions on air toxics concentrations near roadways. *Atmospheric Environment* 43: 3191-3199.
- Tamura, T.M.; Hafner, H.R.; Brown, S.G.; Eisinger, D.S. (2005) Investigation of consistency between ambient monitoring data and MOBILE6.2 emissions predictions for air toxics. Sonoma Technology, Inc. Final Report STI-903632-2621-FR. Prepared for Federal Highway Administration, Office of Natural Environment. *The study concludes: “Analyses of ambient air data showed no consistent and substantial bias in the MOBILE6.2 model estimates for benzene and 1,3-butadiene.”*
- Nadim, F.; Iranmahboob, J.; Holmén, B.; Hoag, G.E.; Perkins, C.; Dahmani, A. (2003) Application of computer models to assess the effects of emission-reduction programs for a sustainable urban air quality management. Conference paper presented at Application of Technology in Urban Development, December 21-28, 2003. Iranian Academic Association.

The Response to Comments in the FEIS also states that the total body of literature needs to be consulted before conclusions can be made regarding analysis of health impacts associated with mobile sources. We note several systematic reviews of studies of traffic and health not included in the FEIS. These reviews should have been described accurately in the Response to Comments section of the FEIS, including the uncertainties associated with them:

- Zhou, Y.; Levy, J.I. (2007) Factors influencing the spatial extent of mobile source air pollution impacts: a meta-analysis. *BMC Public Health* 7: 89. doi:10.1186/1471-2458-7-89
- Salam, M.T.; Islam, T.; Gilliland, F.D. (2008) Recent evidence for adverse effects of residential proximity to traffic sources on asthma. *Current Opin Pulm Med* 14: 3-8.
- Raaschou-Nielsen, O.; Reynolds, P. (2006) Air pollution and childhood cancer: a review of the epidemiological literature. *Int J Cancer* 118: 2920-2929.
- HEI Panel on the Health Effects of Air Pollution. (2010) Traffic-related air pollution: a critical review of the literature on emissions, exposure, and health

effects. HEI Special Report 17 [Online at www.healtheffects.org]

In particular, we note that FHWA referenced a Health Effects Institute (HEI) report (Special Report 16 - Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects) that concluded that exposure to many MSATs comes from sources other than vehicles, and that mobile sources are the primary sources of exposure for only a few of the 21 MSATs listed by the USEPA in its 2001 Rule. We note, however, the recent HEI update to that report, published in January, 2010 (Special Report 17 - Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects). HEI Special Report 17, which was partly funded by FHWA should have been discussed in particular, given its extensive review of epidemiologic, exposure, and toxicological literature. The report concludes that there is sufficient evidence to infer a causal association between exposure to traffic-related air pollution and exacerbation of respiratory symptoms in asthmatic children, between “sufficient” and “suggestive” evidence for new onset childhood asthma and pediatric asthma prevalence, and suggestive evidence for associations with all-cause mortality, cardiovascular illness, and exacerbation of respiratory symptoms in adults with asthma.

Future emissions analysis

Regarding the statement that project area emissions will be lower in the future regardless of which alternative is chosen and that MSAT impacts will also be reduced, EPA points FHWA and NDOT to a 2006 study sponsored by the Southern Nevada Regional Planning Coalition (SNRPC) using the Land use, transportation, and air quality (LUTAQ) model (SNRPC, 2006: Online at <http://www.snrpc.org/Reports/LUTAQFinalReport052506.pdf>; For future reference, EPA recommends that FHWA and NDOT reconcile its results with those of the LUTAQ study, particularly given the presence of air pollutants which do not track with carbon monoxide, such as nitrogen oxide (e.g. NO₂) and components of dust particles.

The study notes that:

- “Maintaining the status quo will mean significant increases in traffic congestion and air pollution.”
- “Reductions in “Distance per Trip” and the “Number of Trips” are required for any significant improvement.”
- “We need to increase our use of mass transit and alternative modes of transportation.”
- “A combination of densification, mixed use and transit charges will:
 - o Keep time in traffic from increasing beyond present levels
 - o Keep air pollution consistently within (below) EPA standards.
 - o Avoid a decrease in the rate of population growth.
 - o Reduce overall costs below the status quo scenario by avoiding the loss of federal transportation subsidies.”

We appreciate the multiple goals of the project, including improved safety and decreased congestion (as stated in the Response to Comments); however, we continue to recommend implementing the best available science in determining potential near-roadway health impacts associated with MSATs and incorporating focused mitigation measures into the ROD. We provide this recommendation due to the sufficient evidence that supports a causal relationship

between traffic-related air pollution and exacerbation of asthma, as well as the context and location of this specific project, which is directly adjacent to a portion of the Las Vegas Highway system that was the subject of the Sierra Club vs. Mineta decision. The settlement of that decision requires FHWA and NDOT to install air pollution monitoring and filtration systems at schools adjacent to the roadway, relocate portable school buildings and playgrounds, and help redesign a nearby high school to minimize exposures, and also retrofit diesel school buses to reduce emissions. EPA believes that similar mitigating actions are applicable to this expansion of the Las Vegas highway system.

Recommendation:

9

- Given the evidence supporting potential health impacts associated with near-roadway exposures, EPA continues to recommend that FHWA and NDOT assess potential effects and commit to measures to reduce health impacts.

10

- Include in the ROD commitments for mitigating potential health impacts from the proposed highway expansion. Suggested mitigation measures include those identified in the settlement agreement for Sierra Club vs. Mineta: installing air pollution monitoring and filtration systems at schools and other sensitive receptor sites adjacent to the roadway; relocating portable school buildings and playgrounds; and helping redesign a nearby high school to minimize exposures.

11

- For future highway expansions proposed in the vicinity (high-traffic volume, high density population) of Las Vegas, we recommend that FHWA and NDOT assess potential health impacts and implement measures to reduce impacts. We appreciate the FHWA commitment to continue to monitor the state of the science and update the interim guidance and we continue to be available to further advance analyses through interagency coordination on this critical issue.

Green Design and Construction

EPA appreciates FHWA and NDOT's interest in using recyclable materials and applying the green design measures listed in the FEIS, and recognizes the need to maintain flexibility in choosing building materials as the project advances and best management practices evolve. Per your interest in green highways, we recommend contacting Jeff Dhont, EPA Region 9 (415-972-3020 or dhont.jeff@epa.gov) regarding information about reuse of industrial materials and other measures to incorporate into the project in order to reduce the environmental impacts of the project.

9. USEPA's comments mention the 2007 NCHRP report on MSAT methodologies. Among other simplifying assumptions, this analysis assumes that vehicles will never be any cleaner than they were in calendar year 2008. This means that the NCHRP analysis only includes a few years of USEPA's 2004 Tier 2 standards, none of the benefit of the 2007 heavy-duty truck standards, and none of the benefit of the recent GHG/fuel economy standards.

Even with these unrealistic assumptions, the NCHRP report concludes that 125,000 vehicles per day would result in a 1 in a million cancer risk for benzene. FHWA would like to note that USEPA's own benzene NESHAP regulations call for a reduction in cancer risk to no more than 100 in a million. Applying the NCHRP results, this would equate to a highway with 12,500,000 vehicles per day, well above the level predicted for I-15. Since USEPA has concluded that a 100 in a million cancer risk is acceptable for industrial sources of benzene, we are hesitant to spend taxpayer funds on mitigation measures to reduce emissions from a roadway project that results in much smaller emissions changes.

On pages 6 and 7 of the FEIS comments, USEPA provided a response to FHWA's concerns about dispersion modeling and risk assessment, including several cites to research studies. FHWA is familiar with the large body of MSAT research, including the examples mentioned here, but as far as we can determine, none of these reports directly address the MSAT changes resulting from the proposed Project NEON. Instead, these cites represent a continuation of the ongoing FHWA/USEPA national policy dispute regarding the appropriate level of MSAT analysis for NEPA documents. FHWA is available and willing to continue this discussion, but we do not feel that one NEPA document for one highway project is the appropriate venue for resolving this.

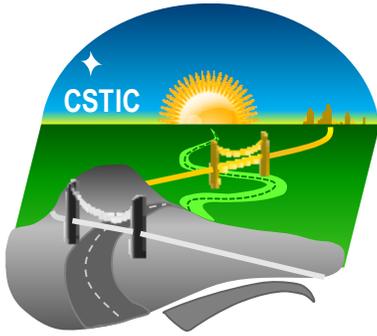
That said, FHWA has discussed the capabilities of dispersion models with USEPA Region 9 previously. To reiterate, FHWA does not have a concern with respect to dispersion modeling in general; we already do this routinely for CO hotspot analysis. Instead, our reservations have to do with MSATs, and using these models to predict 70-year lifetime average concentrations. FHWA's MSAT guidance cites USEPA's own dispersion modeling guidance, which states that dispersion models are more accurate for determining short-term peak concentrations, and less accurate for determining long-term concentrations at a specific location.

USEPA's comments mention the recent Southern Nevada Regional Planning Coalition's LUTAQ study. Based on the report at the link provided by USEPA, this appears to be a regional "sketch planning" exercise. It would be difficult to "reconcile" the results of this study, and the results of our MSAT analysis, because of the different scope of the two analyses. Our MSAT analysis was based on detailed, corridor-specific traffic data, while the LUTAQ study evaluates broad policy measures at the regional scale. Thus, it would be an apples-to-oranges comparison. FHWA does agree that studying the impacts of pollutants other than carbon monoxide would have been useful in the LUTAQ study – EPA's regulatory mobile source programs do not have much effect on carbon monoxide emissions rates, but do project large reductions in particulate matter, ozone precursors, and MSATs.

10. Given the outcome of the MSAT analysis, FHWA does not feel that mitigation strategies are necessary. Table 3-27 of the FEIS documents that MSAT results – 2020 and 2030 MSAT emissions were found to be much lower than 2006 levels, and the Build alternatives have

much lower emissions than the No-Build Alternative. In other words, the project itself is mitigation.

11. Please see the response to comment 7 for NDOT's and FHWA's position on assessing potential health impacts and implementing measure to reduce impacts on future highway expansion projects in Las Vegas.



An Initiative by EPA Region IX: Collaborative for Sustainable Transportation and Infrastructure Construction

October 14, 2009

EPA Region IX Pacific Southwest

The U.S. Environmental Protection Agency's Region 9 (CA, AZ, NV, HI, Pacific Islands) is initiating a program to make how we build transportation and civil infrastructure more sustainable. This includes highways, streets, bridges, stabilizing structures, sewer and water conveyances and treatment systems, transit systems, drainages, dams, levees, ports, etc.

We are exploring the initiation of an action-based *Collaborative for Sustainable Transportation and Infrastructure Construction (CSTIC)*. Also, either within or outside the Collaborative, we are seeking from stakeholders ideas and opportunities in which EPA can support projects that advance sustainability of this infrastructure.

While making our infrastructure more sustainable touches on many areas of sustainability (see bar below), our initial focus will be on **the recycling and reuse of materials**. The effort can be expanded as appropriate.

We recognize that the most meaningful results can often be realized when participants understand



Collaborative for Sustainable Transportation & Infrastructure Construction



their interrelationships, pool resources and collaborate on creative ideas and solutions.

EPA Region 9 proposes to assemble a group of collaborators, and create an environment both to share information and to develop creative actions and work products to bring about sustainability in transportation and infrastructure construction. We intend that the group have its own identity and ownership of its products.

Both through the collaborative and in independent partnerships, our proposed goals and potential outputs are shown above. Rather than be solely EPA-driven, we would like participants to play a key role in defining the



Areas of Sustainability Related to Transportation and Civil Infrastructure Construction

goals, objectives and outputs. We encourage you to participate in the CSTIC and have ownership in products that advance infrastructure sustainability.

Also, if you have potential or existing projects where EPA involvement could significantly support or advance infrastructure sustainability, we want to hear from you. We are interested in successful pilots and best practices.

EPA is developing a network of interested participants. We are learning as much as we can about existing programs, markets, and organizations. We are soliciting input from each participant on what matters most to them, what they see as the major barriers to sustainability of infrastructure, creative ideas, opportunities for progress, demonstration projects, and what EPA can best do to facilitate results.

For More Information

Jeff Dhont
Industrial Materials Sustainability
U.S. EPA Region 9 • Mail Code WST-2
75 Hawthorne Street
San Francisco, CA 94105

(415) 972-3020
dhont.jeff@epa.gov

Recycling and Reuse of Materials



Area of Initial Focus

High-volume industrial byproducts, construction and demolition debris, and scrap tires are produced by the hundreds of millions of tons each year and are often landfilled. Such materials have many beneficial uses, especially in construction of roadways and civil infrastructure. Pavements and structures made with these materials can be stronger, more durable, and less costly. Recycling and reuse can save substantial energy, resources, water, greenhouse gas emissions and environmental impacts embodied in these materials for meeting new societal needs.

12. FHWA and NDOT have reviewed the Green Highway brochure and will consider the information provided during final design.

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052



FEMA

June 21, 2010

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

Dear Mr. Cooke:

This is in response to your request for comments on the I-15 Corridor Improvements and Local Arterial Improvements Study (Project NEON) Final EIS.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Clark (Community Number 320003) and City of Las Vegas (Community Number 325276), Maps revised December 4, 2007. Please note that the City of Las Vegas, Clark County, Nevada is a participant 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.

Steve M. Cooke, P. E.

Page 2

June 21, 2010

- 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.shtm>.

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 Las Vegas floodplain manager can be reached by calling Randy Fultz, Assistant City Engineer, at (702) 229-2176. The Clark County floodplain manager can be reached by calling Denis Cederburg, Director, Department of Public Works, at (702) 455-6020.

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:

Randy Fultz, Assistant City Engineer, City of Las Vegas

Denis Cederburg, Director, Department of Public Works, Clark County

Kim Groenewold, Nevada Department of Conservation and Natural Resources, Division of
Water Resources

Sarah Owen, Floodplanner, CFM, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX



STATE OF NEVADA
 DEPARTMENT OF TRANSPORTATION
 1263 S. Stewart Street
 Carson City, Nevada 89712

file

JIM GIBBONS
 Governor

October 1, 2010

SUSAN MARTINOVICH, P.E., Director

RESPONSE

In Reply Refer to:

Mr. Gregor Blackburn, CFM, Branch Chief
 Floodplain Management and Insurance Branch
 U.S. Department of Homeland Security (FEMA Region IX)
 1111 Broadway, Suite 1200
 Oakland, CA 94607-4052

Dear Mr. Blackburn:

In your June 21, 2010 comments on the Project NEON Final Environmental Impact Statement (FEIS) you requested the Nevada Department of Transportation to review the Flood Insurance Rate Maps (revised December 4, 2007) for Clark County and the City of Las Vegas. Your comments then summarized the National Flood Insurance Program's floodplain management building requirements that would apply to Project NEON.

As is noted in Section 3.9.1 of the FEIS, it is NDOT's understanding that the areas adjacent to I-15 along the project area are not subject to flooding during a 100-year flood. In addition, as a result of FEMA's May 9, 2007, Letter of Map Revision, there is no 100-year floodplain adjacent to US 95 in the project area. Therefore, Project NEON will have no adverse floodplain impacts.

If your agency has a different opinion on the matter, please contact me at (775) 888-7013 or scooke@dot.state.nv.us. Thank you for your agency's comments.

Sincerely,

Steve M. Cooke, P.E.
 Chief, Environmental Services Division
 Nevada Department of Transportation

cc: Randy Fultz, Assistant City Engineer, City of Las Vegas
 Denis Cederburg/Director, Department of Public Works, Clark County
 Kim Groenewold, Nevada Department of Conservation and Natural Resources, Division of Water Resources
 Sarah Owen, Floodplanner, CFM, DHS/FEMA Region IX
 Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

6-29-10 FAA RE I-15 Corridor Improvements (Project NEON).txt

From: Barry.Franklin@faa.gov [mailto:Barry.Franklin@faa.gov]

Sent: Monday, June 28, 2010 10:25 AM

To: Cooke, Steve M

Cc: Abdelmoez.Abdalla@dot.gov

Subject: I-15 Corridor Improvements (Project NEON)

Steve; After review of the submitted cd, it appears that the project would not impact airports in the Las Vegas area. Therefore, the FAA does not have any comments.

Barry Franklin
Federal Aviation Administration
San Francisco Airports District Office
Environmental Protection Specialist
(650) 876-2778 ext. 614 - Voice
(650) 876-2733 - Fax

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DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

500 S Grand Central Parkway 1st Floor · Box 555210 · Las Vegas, NV 89155-5210
(702) 455-5942 · Fax (702) 383-9994

Lewis Wallenmeyer Director · Tina Gingras Assistant Director

July 12, 2010

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

Final Environmental Impact Statement and Section 4(f) Evaluation Study for the I-15 Corridor and Local Arterial Improvements

The Clark County Department of Air Quality and Environmental Management has reviewed the final environmental impact statement (FEIS), and does not anticipate any significant impacts to air quality associated with the I-15 corridor and local arterial improvements.

The "Regional Transportation Plan 2009-2030: A Plan for Mobility in the Las Vegas Region Over the Next 20 Years" (RTP) ensures projected travel-related emissions are less than the mobile source emissions budgets established by the 2006 state implementation plan (SIP) for carbon monoxide and the 2004 SIP for particulate matter-10, and less than the ozone "Action Versus No Build" test as defined in Title 40, Part 93 of the Code of Federal Regulations. We concur that this project meets conformity requirements for carbon monoxide, ozone, and particulate matter by its inclusion in the conforming RTP adopted by the Regional Transportation Commission of Southern Nevada in November 2008 and approved by the U.S. Federal Highway Administration in March 2009.

Thank you for the opportunity to review this FEIS. If you have any further questions, please contact me at (702) 455-1600.

Sincerely,

A handwritten signature in black ink that reads "L. Wallenmeyer".

Lewis Wallenmeyer
Director

BOARD OF COUNTY COMMISSIONERS

Rory Reid Chairman · Susan Brager Vice-Chairman

Larry Brown, Tom Collins, Chris Giunchigliani, Steve Sisolak, Lawrence Weekly

Virginia Valentine, PE, County Manager

DEVELOPMENT
SERVICES
CENTER



Public Works Department
Engineering Planning

731 S. Fourth Street
Las Vegas, NV 89101

Voice 702-229-6541
FAX 702-382-8551
TTY 702-386-9108

July 12, 2010

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

RE: FINAL ENVIRONMENTAL IMPACT STATEMENT (EIS) AND SECTION
4(F) EVALUATION FOR I-15 CORRIDOR AND LOCAL ARTERIAL
IMPROVEMENTS

Dear Mr. Cooke,

The City of Las Vegas has reviewed the above referenced study dated June 2010 for the I-15 Corridor and Local Arterial Improvements and offer the following comments:

1. **Section 2.2.2.2 – Charleston Boulevard Interchange Reconstruction**

The RTC and the City of Las Vegas recently completed a Unified Planning Work Program (UPWP) planning study for East Charleston Boulevard. One of the recommendations of the study was to increase the sidewalks to 10-foot due to the high pedestrian volumes in the corridor. It is requested that Charleston Boulevard within the limits of Project Neon be designed to include 10-foot sidewalks from Shadow Lane to the UPRR to match the study recommendations.

2. **Section 2.2.2.3 - Alta Drive Half Interchange**

This section should be revised to include discussion on the geometrics of Alta Drive/Bonneville Avenue under I-15. The City wants to ensure that the proposed I-15 bridge at Alta Drive/Bonneville Avenue is wide enough to accommodate six travel lanes, dual lefts, an exclusive right turn lane and bicycle lanes. Perhaps a typical cross-section could be done to show the proposed lanes in this area.

3. **Section 2.2.2.4 - Martin Luther King/Industrial Road Connection**

The section should be revised to include the northern and southern limits of the Martin Luther King/Industrial Road Connection. Exhibit 2-1d – Alt G shows Martin Luther King being improved between Alta Drive and the NV Energy corridor about ¼ mile north which would leave an unimproved gap. It is the City's request that NDOT extend the Martin Luther King Boulevard improvements from Alta Drive to the southern limits of Costco which would complete the improvements in this busy corridor. We would like to confirm that this widening of Martin Luther King Boulevard is part of the scope of Project Neon and will be completed with the Phase II improvements.

Las Vegas City Council

Oscar B. Goodman
Mayor

Gary Reese, Ward 3
Mayor Pro Tem

Steve Wolfson, Ward 2

Lois Tarkanian, Ward 1

Steven D. Ross, Ward 6

Ricki Y. Barlow, Ward 5

Stavros S. Anthony, Ward 4

City Manager
Elizabeth N. Fretwell

Public Works Director
Jorge Cervantes
PE., P.T.O.E.



Page 2
July 12, 2010
Project Neon FEIS

We appreciate the opportunity to review this draft study. Please feel free to contact our office should you have any questions regarding these comments.

Sincerely,



Randy L. Fultz, P.E.
Assistant City Engineer
City of Las Vegas

cc: John Taylor, P.E. – CH2MHill
Jorge Cervantes, P.E. – CLV Public Works Director
Cheri Edelman, P.E. - CLV Public Works Deputy Director/City Engineer
Mike Janssen, P.E. – CLV Assistant Traffic Engineer

project neon feis 6_10.docx



JIM GIBBONS
Governor

STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION
1263 S. Stewart Street
Carson City, Nevada 89712

file

October 1, 2010

SUSAN MARTINOVICH, P.E., Director

In Reply Refer to:

RESPONSE

Subject: Nevada DOT Project
NEON Final Environmental Impact
Statement Comments

Mr. Randy Fultz
Assistant City Engineer
City of Las Vegas
Public Works Department
731 S. Fourth Street
Las Vegas, NV 89101

Dear Mr. Fultz:

Thank you for the City's comments on the Project NEON Final Environmental Impact Statement (FEIS) dated July 12, 2010. The City's comments and our responses are found below.

1. Section 2.2.2.2 – Charleston Boulevard Interchange Reconstruction

The RTC and the City of Las Vegas recently completed a Unified Planning Work Program (UPWP) planning study for East Charleston Boulevard. One of the recommendations of the study was to increase the sidewalks to 10-feet due to the high pedestrian volumes in the corridor. It is requested that Charleston Boulevard within the limits of Project NEON be designed to include 10-foot sidewalks from Shadow Lane to the UPRR to match the study recommendations.

Response - Project NEON will provide 10-foot-wide sidewalks as part of the Charleston Boulevard design. The sidewalks will be constructed over the course of several project phases.

2. Section 2.2.2.3 – Alta Drive Half Interchange

This section should be revised to include discussion on the geometrics of Alta Drive/Bonneville Avenue under I-15. The City wants to ensure that the proposed I-15 bridge at Alta Drive/Bonneville Avenue is wide enough to accommodate six travel lanes, dual lefts, an exclusive right turn lane and bicycle lanes. Perhaps a typical cross-section could be done to show the proposed lanes in this area.

Response - The Alta Drive/Bonneville Avenue bridge will be constructed to provide enough width to allow for six 11-foot-wide travel lanes, 11-foot-wide dual left turn lanes, an 11-foot-wide exclusive right turn lane, and 4-foot-wide bicycle lanes in each direction. A typical section showing these features is attached to this letter.

3. Section 2.2.2.4 – Martin Luther King/Industrial Road Connection

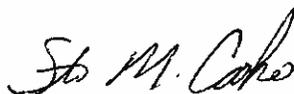
The section should be revised to include the northern and southern limits of the Martin Luther King/Industrial Road Connection. Exhibit 2-1d – Alt G shows Martin Luther King being improved between Alta Drive and the NV Energy corridor about ¼ mile north which would leave an unimproved gap. It is the City's request that NDOT extend the Martin Luther King Boulevard improvements from Alta Drive to the southern limits of Costco, which would complete the improvements in this busy corridor. We would like to confirm that this widening of Martin Luther King Boulevard is part of the scope of project NEON and will be completed with the Phase II improvements.

Response - The Martin Luther King/Industrial Road Connection is part of Project NEON and is identified as part of the Phase 2, Package II improvements. These improvements are also identified on RTC's Regional Transportation Plan with funding sources identified.

Two projects are currently improving the area between Alta Drive and Costco. The new METRO headquarters complex is constructing improvements just north of Alta Drive. The City also has VTN Nevada designing roadway improvements to complete the area between the METRO project and Costco. This project is approximately 90 percent complete and has been assigned the City of Las Vegas project number 107V-5452.

Again, thank you for the City's comments. If you have any questions about our responses or the project in general, please contact me at (775) 888-7013 or scooke@dot.state.nv.us.

Sincerely,



Steve M. Cooke, P.E.
Chief, Environmental Services Division
Nevada Department of Transportation

SMC:tk

Enclosure

cc: Jorge Cervantes, P.E./CLV Public Works Director
Cheri Edelman, P.E./CLV Public Works Deputy Director/City Engineer
Mike Janssen, P.E./CLV Assistant Traffic Engineer

July 16, 2010

Mr. Phil Slagel, P.E.
Senior Project Manager
State of Nevada Department of Transportation
1263 S. Stewart Street
Carson City, NV 89712

Dear Mr. Slagel:

Thank you for your time in meeting with a representative from the Scotch Eighties neighborhood to discuss the status of the Project Neon planning efforts and the related Final Environmental Impact Statement (FEIS). Your cooperation and willingness to openly discuss the dynamics of this project are much appreciated.

Based upon our review of the FEIS and our discussions with you and other State of Nevada Department of Transportation (NDOT) staff and consultants, we would like to formally submit the following comments for the record.

Throughout the environmental review process for Project Neon, the primary concern of the Scotch Eighties neighborhood has been the prevention of noise impacts to our neighborhood resulting from Project Neon, both during and after completion of construction. We are particularly concerned with the way in which the Project design deals with the placement, span, composition and height of the proposed noise barriers or other noise mitigation measures, between Sahara Ave. and Charleston Blvd.

In reviewing the FEIS and consulting with you and other NDOT representatives, it appears that based upon the assumptions used in the modeling for the FEIS, the proposed design at the present time may address many of our concerns. However, we do understand that the Project is still in the very early stages of design, and that the final potential noise effect will not be fully known until the subsequent stages of Project design.

As such, we would like to request that the Project Neon staff proactively and meaningfully involve our neighborhood in the next step of the Project design immediately following the Record of Decision (ROD), so that we may have input into the evolution of the noise mitigation design for the Project. We would also request that in the next phases of design, the Project team specifically work to ensure that the final Project design includes the most effective plan to sufficiently mitigate noise impacts to our neighborhood and other adjacent neighborhoods, even if it requires changes that exceed the mitigation levels proposed in the FEIS. We would also ask that the final Project design specifications include the use of the best materials for noises barrier construction, and the use of asphalt instead of concrete for the construction of the new road surface, to further help mitigate noise impacts.

We would also like to request that all reasonable noise mitigation measures are required of the Project contractors during construction, and that the Project Neon staff proactively involve our neighborhood in the development of the construction specifications so that we may proactively have input into the means by which the contractor will be required to mitigate noise during construction.

Again, we thank you for your time and willingness to continue to work with our neighborhood throughout the Project design.

Sincerely,

Steve Grogan
President
Scotch Eighties Homeowners Association
702-759-0001

cc:

Senator Harry Reid (via fax)
Senator John Ensign (via fax)
Congresswoman Shelly Berkley (via fax)
Senator Valerie Wiener (via email)
Assemblyman Tick Segerblom (via email)
Mayor Oscar Goodman (via fax)
Councilwoman Lois Tarkanian (via fax)
Commissioner Lawrence Weekly (via fax)



JIM GIBBONS
Governor

STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION
1263 S. Stewart Street
Carson City, Nevada 89712

file

SUSAN MARTINOVICH, P.E., Director

October 1, 2010

RESPONSE

In Reply Refer to:

Subject: Nevada DOT Project
NEON Final Environmental Impact
Statement Comments

Mr. Stephen Grogan, President
Scotch Eighties Homeowners' Association
840 South Rancho #4-337
Las Vegas, NV 89106

Dear Mr. Grogan:

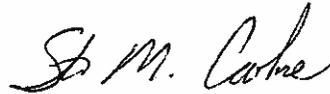
In your Project NEON Final Environmental Impact Statement (FEIS) comments on behalf of the Scotch Eighties Homeowners' Association, you requested the Project NEON team to involve your neighborhood in the design process for the proposed noise barrier adjacent to your subdivision. You requested the project team to ensure that the final design includes the most effective plan to mitigate noise impacts in your neighborhood and adjacent neighborhoods. Please know that it is the Nevada Department of Transportation's (NDOT's) plan to keep your homeowners' association informed about the roadway and noise barrier design as we move forward. When we actually enter the design phase, we can give more consideration to the frequency and format of our interactions with your neighborhood. It may be possible, for example, for us to periodically attend your homeowners' association meetings or prepare an update message that can be shared at those meetings.

You raised one issue in your letter that I would like to clarify. On the second page of your comments you stated the following: "We would also like to request that all reasonable noise mitigation measures are required of the Project contractors during construction, and that the Project NEON staff proactively involve our neighborhood in the development of the construction specifications so that we may proactively have input into the means by which the contractor will be required to mitigate noise during construction." NDOT will develop the project's construction noise mitigation measures, and the measures will apply to the entire project. The mitigation measures will be based on the best practices that NDOT has implemented on projects throughout the state with refinements made as necessary based on the specific circumstances in the Project NEON study area. The mitigation measures will be identified in the project's Record of Decision, which will be published later this summer.

We appreciate your association's interest in this project and desire to work with NDOT during the upcoming design phase. Your comments will be documented in the project's Record of

Decision. If you would like to talk in more detail about your comments or would like additional information, please contact me at (775) 888-7013 or scooke@dot.state.nv.us. Thank you for participating in Project NEON.

Sincerely,

A handwritten signature in black ink that reads "Steve M. Cooke". The signature is written in a cursive style with a large, stylized "S" and "C".

Steve M. Cooke, P.E.
Chief, Environmental Services Division
Nevada Department of Transportation

SMC:tk

cc: File, Record of Decision

10_6-11-10 Shaulis comments on FEIS.txt

From: dahnshaulis@netzero.net [mailto:dahnshaulis@netzero.net]
Sent: Thursday, June 10, 2010 7:15 PM
To: scooke@dot.state.nv.us; rmalfabon@dot.state.nv.us; Abdalla, Abdelmoez (FHWA); snowj@rtcsonv.com; jfinnerty@dot.state.nv.us; kgreen@bgclv.org
Cc: tlgiran@aol.com; sam_mars@cox.net; karl-shon@hotmail.com; agreenemansdream@gmail.com; snowj@rtcsonv.com; lasvegasward5@gmail.com
Subject: Public Comments for FEIS (Project NEON)

Please include these comments in the FEIS Public comments for Project NEON.

Subject: Project NEON Responses are Inadequate in Addressing Environmental Justice Issues

Mr. Cooke and Mr. Abdalla,

I am concerned that NDOT's responses to my questions about Project NEON did not adequately address Environmental Justice concerns for West Las Vegas. One of these was as a result of my error. It would be unfortunate for everyone if these issues are not resolved, and we have another F Street situation.

(1) One of my major concerns is that the Industrial-MLK Connector will be used as a north-south arterial, like Desert Inn Road is as an East-West arterial. This connection could lead to more traffic, higher traffic speeds, more pollution, and more pedestrian deaths of children, elders, and disabled people in West Las Vegas.

Although Project NEON does not physically touch much of West Las Vegas, by tying the Industrial-MLK connector into a widened MLK Boulevard, there may be a large Environmental Justice impact along MLK Boulevard, north of the actual project.

Are you saying that a 6-lane MLK Blvd connected to Industrial Blvd. will continue to have a 30-mph speed? Have you discussed these issues of traffic control with Las Vegas, North Las Vegas, and the RTC? How is it possible that you haven't coordinated with the RTC about public transit as it pertains to this project?

Shouldn't public transit be a part of early planning rather than as an afterthought? Many people in the area (at least 25%) are transit dependent and dedicated transit routes could relieve congestion and pollution.

(2) I'm not sure I understand your point about disregarding the survey of potentially displaced people. Does that mean you will not resurvey this population? How does that comply with EJ concerns?

(3) In response #7, I asked about the impact on the Agassi School. I meant to say the Agassi Boys and Girls Club (800 N. MLK Blvd), near Washington. Again, my concern is that when Industrial Road is connected to MLK, it will increase traffic, traffic speeds, and air pollution, creating a host of EJ issues.

Dahn Shaulis, Ph.D.
streetsociologist

From: dahnshaulis@netzero.net [mailto:dahnshaulis@netzero.net]
Sent: Friday, July 16, 2010 8:11 AM
To: Cooke, Steve M; Abdelmoez. Abdalla@fhwa.dot.gov
Cc: tigeran@aol.com; karl-shon@hotmail.com; agreenemansdream@gmail.com;
sam_mars@cox.net; AKingsey@lvcitylife.com; lespierrsstreater@hotmail.com;
roadwarrior@reviewjournal.com; bjerbic@LasVegasNevada.GOV; snowj@rtcsnv.com
Subject: Project NEON (Final Public Statement-Please Acknowledge
Receipt)

Dear Mr. Cooke and Mr. Abdalla,

Please acknowledge receipt.

Today is the last day for public comment on Project NEON. The US Environmental Protection Agency has already shown concern by denying your first Environmental Impact Statement and by asking you to address specific environmental justice ("EJ") issues.

In my opinion, NDOT and the FHWA still have not adequately or clearly explained the impact of Project NEON, either to the West Las Vegas community, to other agencies, or to me. In fact, your responses in the last Environmental Impact Statement indicate to me that you are not taking these EJ concerns seriously.

These impacts include, but are not limited to:

(1) the displacement of approximately 800 residents, many of whom are low-income and people of color, and

(2) the construction of a connector at Industrial-MLK that is dangerous by design. You are creating an arterial that will likely be used for inter-city traffic, with no plans to mitigate potentially higher speeds (and accidents), higher traffic congestion, and increased air pollution north of the project on MLK.

The impact of the MLK-Industrial Connector will disproportionately affect people of color and low-income people, including vulnerable children, elders, and people with disabilities.

I have explained these issues in detail (e.g. Agassi Boys and Girls Club and its tennis courts, small streets on MLK north, bus stops, cross walks). However, you place the burden on the Cities of Las Vegas and North Las Vegas, the Regional Transportation Commission (RTC), and local housing authorities rather than explaining how you can work together to make this work for the West Las Vegas community.

Personally and professionally I think that Project NEON enables unsustainable desert sprawl to continue, and believe there will be major negative consequences in the future. But if you must build, at least do it with some thought and foresight.

Dahn Shaulis, Ph.D.
streetsociologist

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From: dahnshaulis@netzero.net [mailto:dahnshaulis@netzero.net]
Sent: Tuesday, July 13, 2010 7:51 PM
To: Cooke, Steve M; snowj@rtcsonv.com; bjerbic@LasVegasNevada.GOV;
Abdelmoez.Abdalla@fhwa.dot.gov
Cc: tigeran@aol.com; AKingsey@lvcitylife.com;
roadwarrior@reviewjournal.com; Iesperresstreater@hotmail.com
Subject: Project NEON and Environmental Injustice (Public Comment)

Please add this to my public statement regarding Project NEON. I am cc'ing this to people at the FHWA, Regional Transportation Commission (RTC), and City of Las Vegas because they are complicit in this plan.

Having taken considerable time to study this project, I argue that Project NEON, and the Industrial-MLK connector in particular, will create a disparate impact on groups protected by environmental justice(EJ) policies.

Project NEON also appears to discourage sustainable, transit-oriented development and regional equity.

At this point then, I believe the no-build alternative would make the most sense.

If population does increase in the Las Vegas Valley, transportation routes should encourage infill rather than sprawl. Ultimately, instead of expanding highways, we should be investing in more public transportation and walkable communities.

Project NEON has several issues that require communication among all of these agencies and I have not seen evidence of this communication. I have asked basic questions from NDOT, particularly about the

Industrial -MLK Connector and have not received adequate responses.

First, NDOT has done little to allay my concerns about the people who will be displaced. Your original studies were so flawed you had to remove them from your EIS. I do not trust any of these agencies to fairly compensate these people, who I argue, are disproportionately poor people and people of color.

Second, NDOT has not addressed my concern that creating this Industrial -MLK connector will endanger children (e.g. the Agassi Boys & Girls Club) or elders (e.g. the small side streets that connect to MLK) through increased traffic, traffic speeds, and air pollution.

NDOT claims that the City of Las Vegas will be responsible for traffic speeds in their jurisdiction, and that speeds will remain at 30 miles per hour. Doesn't design make any difference? Doesn't making this connector invite faster speeds, greater traffic volume, and ultimately more traffic congestion and more deaths north of the actual project?

Third, NDOT also could not answer any questions about public transit on the Industrial -MLK Connector. Wouldn't it make sense to plan with the RTC for a bus rapid transit (BRT) route with a strategic stop or station in West Las Vegas, before you build, if you have to build?

Dahn Shaulis
streetsociologist

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JIM GIBBONS
Governor

STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION
1263 S. Stewart Street
Carson City, Nevada 89712

file

SUSAN MARTINOVICH, P.E., Director

October 1, 2010

In Reply Refer to:

RESPONSE

Subject: Nevada DOT Project
NEON Final Environmental Impact
Statement Comments

Mr. Dahn Shaulis
8250 North Grand Canyon Dr. #1024
Las Vegas, NV 89166

Dear Mr. Shaulis:

Your Project NEON Final Environmental Impact Statement (FEIS) comments, which consisted of three e-mails, covered a range of issues with a number of issues raised more than once. To avoid repetition, we have developed a question-and-answer format to respond to your substantive comments. Your questions/comments and Nevada Department of Transportation's (NDOT) responses are found below.

- **Q/C1:** The Martin Luther King/Industrial Road Connector could lead to more traffic, higher traffic speeds, more pollution, and increased pedestrian deaths of children, elders, and disabled people in West Las Vegas.
- **A:** As noted in the FEIS, the purpose of the Martin Luther King/Industrial Road Connector is to divert local trips from I-15 by providing an efficient north-south arterial connection across I-15 that would allow safe and direct access to jobs along Industrial Road and Las Vegas Boulevard. It is expected that this road will be well used otherwise it would not have been included as part of Project NEON.

The City of Las Vegas has informed the project team that the posted speed on Martin Luther King Boulevard between West Carey Avenue and West Bonanza Road has always been 45 mph. In our response to one of your DEIS comments we incorrectly noted that the speed limit on Martin Luther King Boulevard north of US 95 was 30 mph. The City extended the 45 mph speed limit (from 35 mph previously) between West Bonanza Road and Symphony Park/Costco (old Discovery Drive), and it is their plan to increase the speed limit to 45 mph as Martin Luther King Boulevard is widened to six lanes to the Martin Luther King/Industrial Connector. The City may reduce the speed limit to 35 mph on the connector to be consistent with the 35 mph speed limit on Industrial Road. Any concerns you have about the posted speed on Martin Luther King Boulevard or the Martin Luther King/Industrial Connector should be addressed to the City which has jurisdiction over the road.

The Martin Luther King/Industrial Connector will not result in "more traffic." It will redistribute traffic that would otherwise access Industrial Road and Las Vegas Boulevard using other streets. Because the Martin Luther King/Industrial Connector will provide a more direct link

to Industrial Road and Las Vegas Boulevard than currently exists, it will reduce vehicle miles traveled which should result in less, not more pollution.

Improvements to the Martin Luther King/Industrial Connector will meet American Disability Act requirements for pedestrians including sidewalks on both sides of the street.

Pedestrians travelling along the new connection will actually have fewer conflicts with motorists and trains due to the elevated nature of the connection. Due to these facts, we respectfully disagree with the assertion that any user of Martin Luther King Blvd will be in greater danger once the project is complete.

- **Q/C2:** Although Project NEON does not physically touch much of West Las Vegas, by tying the Martin Luther King/Industrial Connector into a widened Martin Luther King Boulevard, there may be a large environmental justice impact along Martin Luther King Boulevard north of the project.
- **A:** Although you do not state what type of impact(s) the environmental justice community along Martin Luther King Boulevard north of Project NEON would bear by connecting the Martin Luther King/Industrial Connector to the existing 6-lane Martin Luther King Boulevard, NDOT disagrees with your general contention. FHWA's Order 6640.23 defines adverse effects that could be caused by transportation improvements. Examples of the effects cited in that document include adverse employment effects, displacements of persons or businesses, increased traffic congestion, destruction of aesthetic values, and illness or death among others. NDOT does not see how any of these effects would be caused by tying the Martin Luther King/Industrial Connector to the existing 6-lane Martin Luther King Boulevard. Quite the opposite, NDOT envisions the positive effect the Martin Luther King/Industrial Connector will provide by creating a more efficient connection to employers east of I-15. As noted in the response to your fifth comment below, the Martin Luther King/Industrial Connector will not increase traffic volumes on Martin Luther King Boulevard north of Project NEON (north of US 95) or create impacts that could accompany increased traffic volumes. The inset on page 1-18 of the Final EIS shows how traffic volumes build on Martin Luther King Boulevard north of US 95 because the route is used to access the interstate system and then dramatically drop off south of US 95. Project NEON will not change that existing pattern.
- **Q3:** How is it possible that Project NEON has not coordinated with the Regional Transportation Commission of Southern Nevada (RTC)?
- **A:** The project team has coordinated with the RTC on a range of issues during the project, and, as evidenced by their December 2009 resolution, the RTC supports the project. It is the RTC's position that, while in the long-term the Martin Luther King/Industrial Connector has potential for the development of direct north-south RTC Transit service west of the downtown, this link is not Project NEON's main transit benefit. In a July 26, 2010, e-mail, the RTC noted they are "cooperating with NDOT in the development of regional express transit service making use of HOV lanes constructed as part of freeway improvements. The first such service is the "C" line express that started operating this spring on US 95. This will be followed by the "W" line on Summerlin Parkway and US 95 later this fall. The Project Neon HOV direct connect between US 95 and I-15 opens up the possibility of extending such services to provide express transit service direct between the north-western suburbs and the strip." In addition, the RTC noted, "Project Neon includes the grade separation of Grand Central at Charleston, which provides a possible opportunity to extend the Gold Line and create an even more direct route between the Symphony Park/downtown west area and the north end of the Strip."

- **Q4:** I'm not sure I understand your point about disregarding the survey of potentially displaced people. Does this mean you will not resurvey this population? How does that comply with EJ concerns?
- **A:** All people displaced by the project will be interviewed during the real estate phases of the project. This approach insures NDOT will be able to respond to the specific needs of those affected by the project. There is no purpose in surveying people living in residences that will be displaced by the project in advance of the real estate phase because they may not be there when construction begins.
- **Q5:** I asked about the project's impact on the Agassi School in my Draft EIS comments. I meant to ask about the project's impact on the Agassi Boys' and Girls' Club (800 North Martin Luther King Boulevard) near W. Washington Avenue. Again, my concern is that when Industrial Road is connected to Martin Luther King Boulevard it will increase traffic, traffic speeds, and air pollution creating a host of environmental issues.
- **A:** The intersection of North Martin Luther King Boulevard and W. Washington Avenue is well north of the project area. As noted in Question 2, North Martin Luther King Boulevard at Washington Avenue has recently been expanded to six lanes to accommodate existing traffic. Connecting Martin Luther King Boulevard to Industrial Road will not attract additional traffic to Martin Luther King Boulevard north of the project area. If there was another route that North Las Vegas traffic used to access the interstate system or Industrial Road, it might be argued that the more efficient Martin Luther King/Industrial Connector would attract traffic from that route, but that is not the case. Today, North Las Vegas traffic travels south on North Martin Luther King Boulevard (through the W. Washington Avenue intersection) to reach the interstate or Industrial Road. After Project NEON is completed North Las Vegas traffic will travel south on North Martin Luther King Boulevard (through the W. Washington Avenue intersection) to reach the interstate or the Martin Luther King/Industrial Connector.
- **Q/C6:** If population does increase in the Las Vegas valley, transportation routes should encourage infill rather than sprawl. Ultimately, instead of expanding highways, we should be investing in more public transportation and walkable communities.
A: As noted on pages 1-3, the primary purposes of Project NEON are not related to development. Rather the project is intended to improve traffic operations, improve safety, and improve mobility. A secondary purpose of the project is to accommodate economic redevelopment through improved access to downtown Las Vegas and the Resort Corridor. There is no aspect of this project that encourages sprawl. Project NEON improves I-15 in its current location and will provide High Occupancy Vehicle (HOV) lanes that tie into the HOV lanes on US 95. In addition, Project Neon grade separates Grand Central Parkway at Charleston Boulevard, which provides a possible opportunity to extend the Gold Line Bus Rapid Transit service and create an even more direct route between the Symphony Park/ downtown west area and the north end of the Strip.

Improvements such as the Oakey Boulevard/Wyoming Avenue Railroad Overpass and Martin Luther King/Industrial Connector will provide safer, more efficient connections between developed neighborhoods east and west of I-15. Finally, improved pedestrian connections will be provided by the Oakey Boulevard/Wyoming Avenue Railroad Overpass and Martin Luther King/Industrial Connector, as well as along Charleston Boulevard. These improvements represent the investments in public transportation and walkable communities that you support.

Your comments will be documented as part of the project's Record of Decision. You have been included on the project mailing list and we will keep you notified of project progress and public events. If you would like to talk in more detail about your comments or would like additional information, please contact me at (775) 888-7013 or scooke@dot.state.nv.us. Thank you for participating in Project NEON.

Sincerely,

A handwritten signature in black ink that reads "Steve M. Cooke". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Steve M. Cooke, P.E.
Chief, Environmental Services Division
Nevada Department of Transportation

SMC:tk

cc: File, Record of Decision

PM₁₀ Additional Data



600 S. Grand Central Parkway, Suite 350 • Las Vegas, Nevada 89106-4512 • 702-676-1500 • Fax: 702-676-1518

Jacob L. Snow,
General Manager

September 13, 2010

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

Final Environmental Impact Statement for the I-15 Corridor Improvements and Local Arterial Improvements (CEQ #20100211)

Dear Mr. Cooke:

This letter is in response to the August 16, 2010 correspondence from the Nevada Department of Transportation (NDOT) to the Regional Transportation Commission of Southern Nevada (RTC) regarding the issue of whether Project Neon is in fact a Project of Air Quality Concern as defined by 40.CFR 93.116(a).

As part of the consultation process requested by the Federal Highway Administration (FHWA), our agency reviewed: 1) the content of and analysis related to the FIES for Project Neon, 2) the July 16, 2010 letter from the U.S. Environmental Protection Agency (USEPA) to the FHWA questioning the analysis and conclusion of the environmental work – specifically related to the contribution of particulate matter from diesel vehicles, and 3) the NDOT's letter of consultation with the RTC outlining the rationale that led your agency to conclude that Project Neon is not a Project of Air Quality Concern.

40.CFR 93.116(a) specifies conditions that can trigger the need to conduct project level conformity, in particular the requirement to conduct a PM10 hot-spot analysis. The most potentially applicable conditions include: 1) the construction of new highway projects that generate a 'significant' number of diesel vehicles and related emissions, 2) the degradation of adjacent intersection(s) level of service related to the increase in diesel vehicles from a project, and 3) the citing of new transit terminals that have significant diesel vehicle demand. For each of the actions listed above, the RTC agrees with NDOT - none of these conditions apply to Project Neon and therefore should not trigger project level conformity requirements.

On the other hand, the growth of diesel vehicles and related particulate matter emissions as a result of infrastructure improvements is potentially applicable - as suggested in the July 16, 2010 EPA letter to the FHWA. The RTC understands the intent of the EPA assertion, if trucks represent 4-5% of the existing modal split, then it would reason that trucks would exceed the 10,000 threshold per day based on a 200,000 vehicle per day estimate.

The root issue is the accuracy and confidence of the future truck demand projections. First, we agree in principal with NDOT on this issue; improvements to I-15 will have the effect of attracting additional passenger vehicles onto the facility as travel becomes more reliable and less congested. Historical travel trends and past modal surveys support the assertion that increases will be auto dominated on the mainline of I-15.

On the issue of truck projections, the RTC agrees in part with the EPA; there will be some increase in truck/diesel movements on the facility, but nowhere near the level that would trigger project level conformity requirements. The RTC believes that most of the increases in truck demand will be related to growth within the local economy, incrementally adding new trucks onto the network. In addition, based on our work with socioeconomic data/projections for the region, we know of no large scale projects would generate significant new truck demand in southern Nevada.

On the other hand, we have to look beyond the state to assure an accurate accounting of projected truck demand. Given our geographic location, it is reasonable to assume that the vast majority of any significant growth in truck travel would likely come from southern California. As part of Project Neon's environmental work, truck projections on Nevada highways were established based on freight projection data from the southern California area and the local economy. While some annual growth in truck movements are expected from southern California freight activities and local businesses, based on the best available data, it is reasonable to conclude that daily truck demand will not exceed the thresholds defined in 40.CFR 93.116(a),

In summary, we agree with NDOT for the reasons listed above - that Project Neon is not a Project of Air Quality Concern and therefore does not require any conformity analyses. If you have any questions or concerns, please contact me at (702) 676-1500.

Sincerely,



Jacob L. Snow
General Manager, RTC of Southern Nevada

Cc: Fred Ohene/RTC
Martyn James/RTC
Jerry Duke/RTC

RTIP ID# (<i>required</i>) 4149, 4151, 4162, 4161, 184	
Project Description (<i>clearly describe project</i>)	
<p>The Nevada Department of Transportation (NDOT) and the Federal Highway Administration (FHWA), in cooperation with the Regional Transportation Commission of Southern Nevada (RTC) and the City of Las Vegas, are proposing to improve the safety and travel efficiency in the Interstate Highway 15 (I-15) corridor, from the Sahara Avenue interchange to the I-15/US95/I-515 interchange (the Spaghetti Bowl). The proposed action includes improvements to I-15 and to local arterials that influence traffic operations on I-15. Collectively, the I-15 and local arterial improvements are known as Project NEON. The proposed action consists of the following:</p> <ul style="list-style-type: none"> • Constructing northbound and southbound high-occupancy vehicle (HOV) lanes in the median on I-15, connecting the express lanes from Sahara Avenue to the HOV lanes on US 95 by a direct-connector ramp • Adding one through lane in each direction in various locations (no through lane would be added in some areas) • Constructing northbound and southbound direct connectors or collector-distributor lanes to separate I-15 through traffic from traffic using local interchanges <p>The proposed action also includes the following local arterial improvements to address transportation deficiencies on I-15:</p> <ul style="list-style-type: none"> • Constructing the Martin Luther King/Industrial Road Connector, which includes grade separating Oakey Boulevard and Wyoming Avenue over the Union Pacific Railroad and Industrial Road • Reconstructing the Charleston Boulevard interchange (including improvements to Grand Central Parkway) and constructing a half-diamond interchange at Alta Drive <p>Attachment 1 shows the interstate and arterial components of the proposed action.</p> <p>A final Environmental Impact Statement (FEIS) was prepared for the proposed project in June 2010 pursuant to the National Environmental Policy Act (NEPA). A detailed description of preferred alternative (Alternative G) including a description of the through lanes, HOV lanes, and other project components is provided in Section 2.2.2 of the FEIS. Detailed figures showing the project configuration for Alternative G are included in Chapter 2 (Exhibits 2-1a through 2-1d). The FEIS is available online at http://www.ndotprojectneon.com/. All figures are included under the Exhibits section of the online document.</p> <p>The proposed project is included in the Regional Transportation Commission (RTC) of Southern Nevada 2030 Regional Transportation Plan (RTP) and 2009-2012 Transportation Improvement Program (TIP), which was found to be conforming by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) in March 2009.</p>	
Type of Project (<i>use Table 1 on instruction sheet</i>)	
<ul style="list-style-type: none"> • Change to existing state highway • Change to existing regionally significant street • Reconfigure existing interchange • Roadway realignment 	
County Clark	Narrative Location/Route & Postmiles Begins south of the I-15/Sahara Avenue interchange and continues to the I-15/US 95/I-515 interchange (the Las Vegas Spaghetti Bowl) EA72760, EA73039, EA 72044
Lead Agency: NDOT	

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

Contact Person Steve Cooke (NDOT)		Phone# 775-888-7686		Fax#		Email scooke@dot.state.nv.us	
Hot Spot Pollutant of Concern (check one or both) PM2.5 PM10 ✓							
Federal Action for which Project-Level PM Conformity is Needed (check appropriate box)							
Categorical Exclusion (NEPA)		EA or Draft EIS		✓ FONSI or Final EIS		PS&E or Construction	
Other							
Scheduled Date of Federal Action: 10/21/2010							
Current Programming Dates (as appropriate)							
	PE/Environmental		ENG		ROW		CON
Start	2003		2010		2011		2013
End	2010		2027		2025		2030
Project Purpose and Need (Summary): (attach additional sheets as necessary)							
Purpose of the Project							
The proposed action has the following primary purposes:							
<ul style="list-style-type: none"> • Improve traffic operations by separating freeway traffic from arterial traffic • To improve safety by reducing the merge and diverge sections (areas where traffic entering or exiting the interstate conflicts with through traffic) • To improve mobility by increasing I-15 capacity, reducing demand, or both 							
The secondary purposes of the project are to accommodate economic redevelopment through improved access to downtown Las Vegas and the Resort Corridor and to accommodate traffic that would use HOV lanes from Sahara Avenue to existing HOV lanes on US 95.							
Need for the Project							
The need for the proposed action is based on existing and future corridor deficiencies that are a combination of factors related to:							
<ul style="list-style-type: none"> • Existing and future congestion (traffic demand/capacity) • Crash rates • Operational deficiencies • System linkage 							
Existing and future congestion (traffic demand/capacity)							
Reliable travel along I-15 is impeded by current levels of congestion, and traffic forecasts indicate that traffic volumes on I-15 within the study area will more than double from 2003 to 2030. I-15 northbound currently operates at LOS D or better during the AM peak period; however, this section of freeway experiences LOS E (at capacity) in several segments during the PM peak period. In the southbound direction, I-15 experiences AM peak congestion (LOS E) north of the Charleston Boulevard interchange because of heavy traffic from US 95 southbound combining (weaving) with the I-15 southbound traffic. Under 2030 peak traffic conditions, there would be several northbound segments that operate at LOS F (gridlock) in the AM peak period and most segments would operate at LOS E or F in the PM peak period. In the southbound direction, every segment would operate under gridlock conditions in the AM and PM peak periods. For roadways at or exceeding LOS E, traffic flow is unstable, minor disruptions may cause traffic backups and freedom to maneuver safely is compromised.							
Crash rates							
Roadway safety is measured by the frequency (rate) and severity of crashes. An important objective of any transportation improvement is to minimize overall crash potential through roadway mainline and intersection/interchange design features and access management. Based on data from the NDOT 2006 Annual Crash Report, the statewide total crash rate within the project area was exceeded in the Sahara Avenue to Charleston Boulevard segment of the proposed project. Within that segment, the crash rate increased about 14 percent between 2006 and 2007, and by about 12 percent between 2007 and 2008. Approximately 70 percent							

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

of crashes occurring in the project area are rear end crashes, which is indicative of bumper-to-bumper, stop-and-go, traffic flows where traffic can come to an abrupt stand-still.

Operations

The ability of a highway to serve traffic efficiently and effectively is influenced not only by traffic characteristics, but also by highway design features. A number of geometric and interchange design deficiencies as well as deficient arterial operations within the project area contribute to travel efficiency and safety problems on I-15.

System Linkage

RTC, local communities, and NDOT are advancing a program of modal improvements, including highway, bus rapid transit (BRT), a system of HOV lanes, express bus, and supporting park-and-ride facilities. These integrated modal improvements aim to provide a balanced transportation system for the Las Vegas Valley.

A complete discussion of Purpose and Need is provided in Chapter 1 of the FEIS, which is available online at <http://www.ndotprojectneon.com/>

Surrounding Land Use/Traffic Generators (especially effect on diesel traffic)

According to the Land Use Element of the City's 2020 Master Plan, the project area is located within the Southeast Sector of the City of Las Vegas, and it is the most mature and built-out sector. As shown in Attachment 2 (Figure 3-7), land uses in the vicinity of Project NEON include industrial, commercial, single-family and multi-family residential, and institutional.

Opening Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility

Opening year was not analyzed. Because project phasing and funding will take place over many years, the year that represents opening year cannot be clearly defined. It is very possible that 2030 (now considered horizon year) will be opening year. In the absence of opening year data, Existing Conditions are presented below:

Traffic Conditions to Support PM10 Analyses				
Location	2003			
	Existing Conditions			
	ADT	Truck %	Truck ADT	LOS
Sahara to Charleston	240,585	5.9%	14,195	E
Charleston to US 95	230,000	5.9%	13,570	E

RTP Horizon Year / Design Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility

Traffic Conditions to Support PM10 Analyses								
Location	2030				2030			
	No-Build Condition				Build (Alternative G) Condition			
	ADT	Truck %	Truck ADT	LOS	ADT	Truck %	Truck ADT	LOS
Sahara to Charleston	549,707	5.9%	32,433	F	549,707	5.9%	32,433	D
Charleston to US 95	501,968	5.9%	29,616	F	501,968	5.9%	29,616	D

Note: LOS represents worst case direction and time of day

Opening Year: If facility is an interchange(s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT

Opening year was not analyzed.

RTP Horizon Year / Design Year: If facility is an interchange(s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT

Please see Tables 12, 13, 18, and 19 in Attachment 3 (Summary of Traffic Impacts) for Build and No Build level of service. Data for Build Scenario is presented in the following table. Percent Trucks is not expected to change between the Build and No Build Scenarios.

TABLE 1. INTERSECTION LOS AND VOLUME SUMMARY				
Intersection	Intersection LOS	Total Entering Volume (vehicles per hour)	Percent Trucks	Total Entering Truck Volume (vehicles per hour)
Alta/NB Ramp	C	2658	6.70%	178
Charleston/NB Ramp	B	8147	6.70%	546
Charleston/SB Ramp	C	6479	6.70%	434
HOV Connector/Drop Ramps	C	2524	6.70%	169
Sahara/Rancho/SB Ramp	F	12563	6.70%	842
Sahara/NB Ramp	F	12335	6.70%	826
Western/Wyoming/Oakey	D	3682	6.70%	247
Western/HOV Connector	C	3953	6.70%	265
Grand Central/South Jug Handle	C	3255	6.70%	218
Grand Central/North Jug Handle	C	3269	6.70%	219
Grand Central/Bonneville	C	3700	6.70%	248
Charleston/Jug Handles	B	7336	6.70%	492
Charleston/Commerce	A	5085	6.70%	341
Charleston/Main	F	6404	6.70%	429
Charleston/Shadow	D	5721	6.70%	383
Alta/MLK	D	6755	6.70%	453
MLK-Industrial/Wyoming Connector	B	3273	6.70%	219
Wyoming/Wyoming Connector	B	2709	6.70%	182

Source: CH2M HILL traffic analysis

Summary of Project Impacts on Diesel Traffic

Impacts on I-15: As indicated in the tables above, the total demand for traffic would remain the same with or without Project NEON. The I-15 corridor is now super saturated with a continuous peak travel period that begins at 6:00AM and continues past 6:00PM. (For an illustration of this, see page 1 of Attachment 3: Summary of Traffic Impacts.) Providing additional capacity on I-15 will remove some traffic from adjacent arterials. In addition, traffic patterns will show dips during the day, as in typical AM, mid-day, and PM traffic peaks. Without Project NEON the peak traffic period will probably continue to spread to accommodate the traffic demand, as people begin their trips to work earlier and delay their return home until later. The adjacent arterial network is also saturated for most of the day and has no spare capacity. There are very limited viable north/south arterials in the study area. This situation causes many of the local trips to take place on I-15, instead of the local street network.

Impacts on other roadways: Section 1.2.3.3 of the Purpose and Need discussion covers the relationship of this project to arterial streets. Most of the changes between arterial traffic and I-15 traffic are related to employment, commercial and recreational uses east of I-15. The discussion specifically mentions Martin Luther King (MLK) Boulevard (serving access to employers along the strip) and Oakey Boulevard (connecting a large residential area west of I-15 to employers east of I-15). The project is not designed to achieve diversion of freight or delivery traffic between I-15 and the arterials or any configuration changes to facilitate freight movement in general.

The addition of the MLK to Industrial Road direct connect flyover and connecting Grand Central Parkway to Western Avenue, which will be grade-separated over Charleston Boulevard, will provide two much needed north/south arterial connections, allowing more of the local trips to take place on the arterials, rather than on I-15. The intersection levels-of-service, for the improved intersections within the project limits, show marked improvements (see Attachment 3, Tables 12, 13, 18 and 19). The freeway mainlines also show definite improvements in operations (see Attachment 3, Figures 20 and 22 showing speeds increase significantly between No Action and the build alternative). The HOV lanes provide additional free-flowing lanes for traffic. Project NEON will also allow ramp metering to be added where it does not exist today - the on ramps do not have enough storage capacity. The expanded ITS system will allow the entire network to be managed real-time. The ramp meters will also have HOV bypass lanes, to further encourage carpooling.

Impacts on Diesel Traffic: In addition to not changing total traffic volumes, the project is not expected to impact truck volumes. However, the benefits of the free flowing traffic will also be realized for truck traffic in the corridor, reducing PM10 emissions from them. The net result of the improved operations on both I-15 and on the arterial network will reduce stop and go traffic, reduce delays at intersections, and provide an overall reduction in emissions.

Impacts to Sensitive Receptors: Detailed figures showing the proposed action are provided in Exhibits 2-1a through 2-1d of the FEIS, as referenced above. Sensitive receptors (residential areas) are shown in Exhibit 3-12. All residential areas are located to the west of I-15 with commercial and industrial properties located to the east of I-15 (Exhibit 3-7). Project NEON would widen the mainline I-15 to the east, in the light industrial area. New freeway ramps and local roads would be built to the west of I-15, in areas that are commercial, light industrial and residential. The right of way to be acquired is mainly on the east side of I-15, with some residential displacement on the west side (Exhibit 3-3). The residences that remain on the west side would be behind new sound walls, and would be buffered from mainline freeway truck traffic by the new ramps and local roads. The US 95 connector ramps will carry some heavy truck traffic to and from US 95 West, but the truck percentage is very low on that freeway (about 2%). Those connectors do come closer to some remaining residential areas in a few spots (at Alta), but are generally further from them than today. Project NEON would not bring heavy truck traffic closer to sensitive receptors.

Air Quality Background Information

EPA's air quality data web site shows that for the entire period from 2005 through 2009, and thus far in 2010, there have been no violations of the PM10 standard in the greater Las Vegas area. This includes the City Center monitor, where the combined traffic volumes from I-15 and I-515 have exceeded 400,000 vehicles per day in recent years.

A MOBILE6 trend analysis shows that even though traffic volumes more than double in the project corridor between 2003 and 2030, emissions per mile of roadway in 2030 are still lower than they were in 2003, because PM10 emissions rates in MOBILE6 decrease by almost 60% over that period. So the increase in traffic volume over time is not a concern from a PM10 standpoint—the PM10 monitors along I-15 show attainment with today's traffic volumes and emissions rates, and since the decrease in emissions rates is more than offset the increase in traffic volumes, they will likely still show attainment in 2030.

In addition, the RTC's conformity analysis shows that regional PM10 emissions will also decrease during that period, implying that background concentrations will decrease as well. The RTC's conformity analysis for the 2030 transportation plan shows that exhaust, brake and tire wear, and road dust emissions in 2030 (the year of peak emissions) will be well below the emissions budget in the SIP, suggesting that regional transportation PM10 emissions will be well below the level needed for the area to attain the PM10 standard. As part of the recent RTP amendment, 2030 emissions were modeled at 111.3 tons per day, compared to an attainment emissions budget of 141.4 tons per day.

Criteria for Identifying Projects of Air Quality Concern

(b) PM_{10} and $PM_{2.5}$ hot-spot analyses. (1) The hot-spot demonstration required by §93.116 must be based on quantitative analysis methods for the following types of projects:

- (i) New highway projects that have a significant number of diesel vehicles, and expanded highway projects that have a significant increase in the number of diesel vehicles;
- (ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- (iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
- (iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
- (v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM_{10} or $PM_{2.5}$ applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

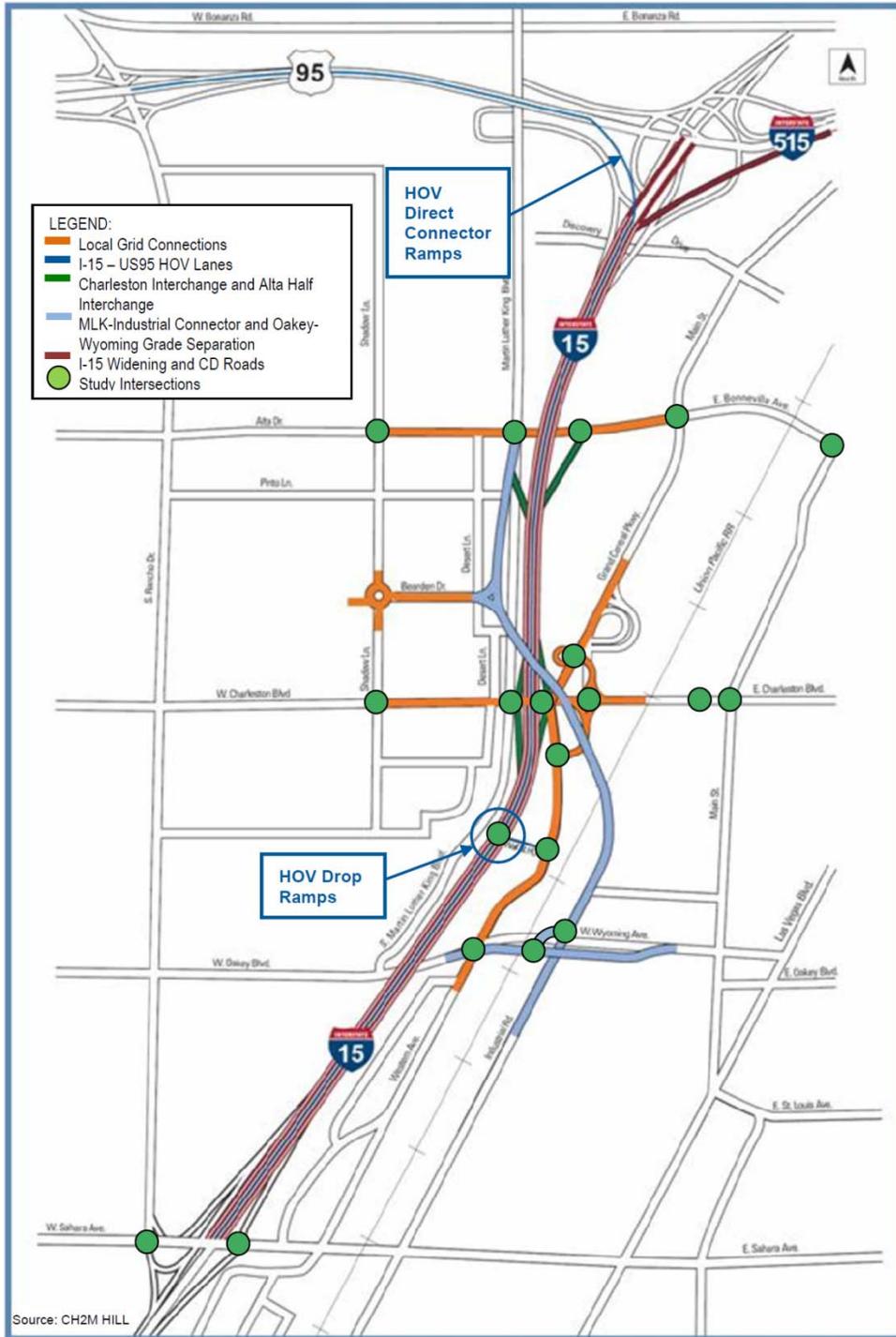
Discussion:

Criteria (iii) and (iv) do not apply, as this project does not involve a transit terminal or transfer point. Clark County Department of Air Quality and Environmental Management (DAQEM) reviewed this project, and did not conclude that (iv) applies (in fact, they concluded that none of the criteria apply).

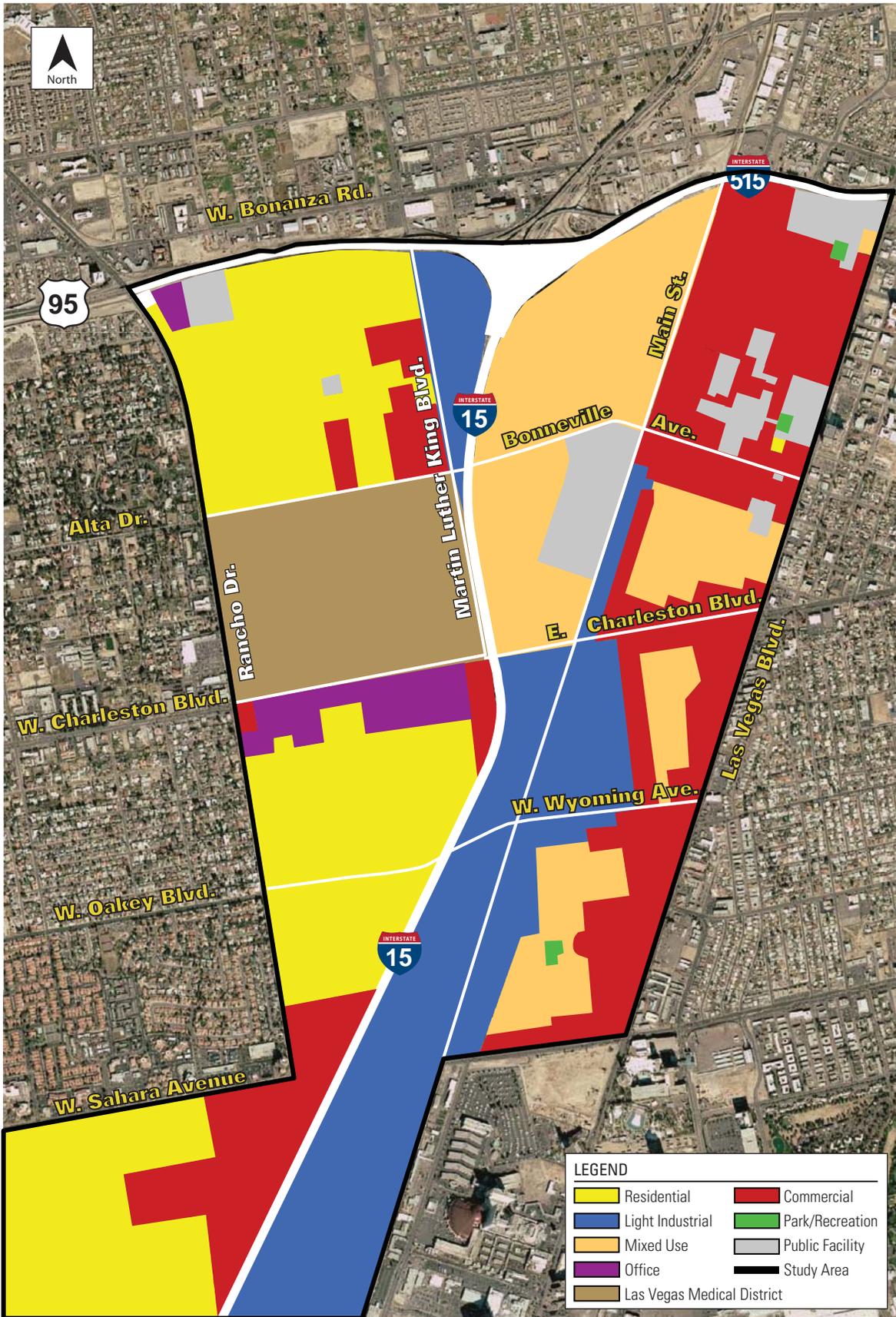
As noted above in the traffic discussion and the project purpose and need, the project is primarily oriented toward reducing congestion due to light-duty gasoline vehicle commuter and recreational traffic activity. It is not expected to result in a change in overall diesel traffic volumes, or increases in the number of diesel vehicles using intersections. Diesel vehicles that do use the corridor will benefit from improved speeds on I-15 and reduced delay at arterial intersections, reducing PM10 emissions.

Since there is no evidence of a significant change in diesel volumes, and the project is not designed to change diesel volumes, we do not consider it to be a project of air quality concern.

Attachment 1: Major Project Components



Attachment 2: Land Use (Figure 3-7)

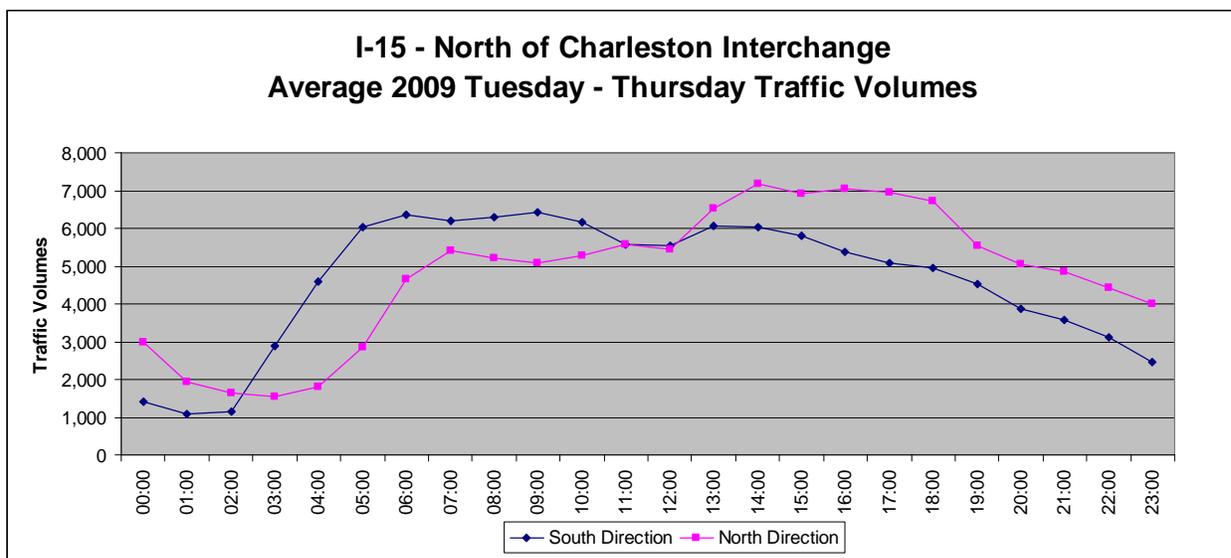
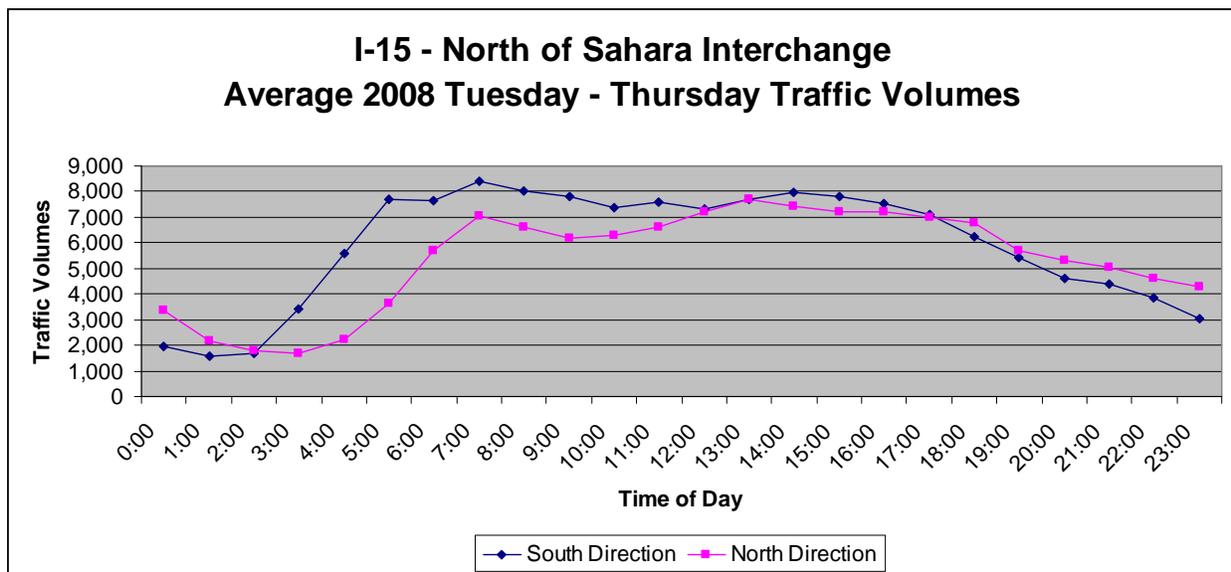


Attachment 3: Summary of Traffic Impacts (*attached as separate file*)

Attachment 3: Summary of Traffic Impacts

The total demand for traffic will remain the same with or without Project NEON. The corridor is now super saturated with a continuous peak travel period that begins at 6:00AM and continues past 6:00PM. Providing additional capacity will do two things, one will be to remove some traffic from adjacent arterials, and two, traffic patterns will show dips during the day, as in typical AM, mid-day, and PM traffic peaks. Without Project NEON the peak traffic period will probably continue to spread to accommodate the traffic demand, as people begin their trips to work earlier and delay their return home, until later. The adjacent arterial network is also saturated for most of the day, and has no spare capacity. There are very limited viable north/south arterials in the study area. This situation causes many of the local trips to take place I-15, instead of on the local street network.

This existing peak spreading is shown in the following tables.



The no-build intersection levels-of-service, taken from the Change in Control of Access Report, is shown in the following tables.

**Table 12: CORSIM Intersection Analysis Results
No Build - Year 2030 - AM Peak**

Intersections	Approach	Phase Failures	Control Delay							
			Total		Left		Right		Through	
			Delay (second/veh)	LOS (HCM 2000 Criteria)						
Sahara Ave. and Rancho Dr.	NB	13	69	E	0	A	74	E	0	A
	SB	18	95	F	101	F	90	F	91	F
	WB	0	37	D	0	A	33	C	35	C
	EB	24	128	F	111	F	105	F	139	F
Sahara Ave. and I-15 NB Ramps	NB	0	99	F	42	D	164	F	0	A
	WB	27	228	F	0	A	194	F	182	F
	EB	27	89	F	352	F	0	A	29	C
Oakey Blvd. and MLK	SB	0	18	B	22	C	16	B	0	A
	WB	0	0	A	0	A	7	A	0	A
	EB	0	8	A	15	B	0	A	7	A
Western Ave. and Wyoming Ave.	NB	1	34	C	50	D	11	A	53	D
	SB	20	137	F	144	F	86	F	139	F
	WB	0	30	C	61	E	15	B	15	B
	EB	0	30	C	59	E	10	A	29	C
MLK-Industrial Rd. and Wyoming Ave.	NB	0	24	C	40	D	7	A	34	C
	SB	1	44	D	45	D	48	D	46	D
	WB	0	34	C	43	D	17	B	27	C
	EB	0	16	B	27	C	12	B	13	B
Grand Central Pkwy. and I-15 Ramps	NB	0	29	C	0	A	27	C	30	C
	SB	3	34	C	40	D	7	A	38	D
	WB	0	17	B	0	A	18	B	18	B
	EB	0	14	B	0	A	18	B	20	B
Grand Central Pkwy. and Outlet Mall	NB	0	7	A	9	A	8	A	8	A
	SB	0	11	A	0	A	14	B	11	A
	WB	0	18	B	26	C	11	A	29	C
	EB	1	39	D	50	D	25	C	0	A
MLK and I-15 SB Off-Ramp	NB	0	13	B	0	A	0	A	13	B
	SB	3	38	D	0	A	0	A	38	D
	WB	2	37	D	0	A	0	A	36	D
Charleston Blvd. and Shadow Ln.	NB	1	51	D	67	E	23	C	66	E
	SB	3	46	D	76	E	9	A	71	E
	WB	0	5	A	34	C	6	A	2	A
	EB	8	91	F	588	F	46	D	39	D

**Table 12 (continued): CORSIM Intersection Analysis Results
No Build - Year 2030 - AM Peak**

Intersections	Approach	Phase Failures	Control Delay							
			Total		Left		Right		Through	
			Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)
Charleston Blvd. and MLK	NB	6	59	E	79	E	8	A	53	D
	SB	2	64	E	68	E	67	E	60	E
	WB	11	56	E	82	F	58	E	51	D
	EB	6	49	D	38	D	86	F	45	D
Charleston Blvd. and Grand Central Pkwy.	NB	1	57	E	78	E	12	B	51	D
	SB	22	68	E	73	E	38	D	93	F
	WB	30	98	F	246	F	57	E	86	F
	EB	4	35	C	87	F	27	C	33	C
Charleston Blvd. and Commerce St.	NB	22	312	F	427	F	265	F	0	A
	WB	1	28	C	0	A	0	A	28	C
	EB	10	23	C	0	A	19	B	23	C
Charleston Blvd. and Main St.	NB	9	236	F	505	F	121	F	123	F
	SB	23	130	F	101	F	171	F	113	F
	WB	21	76	E	107	F	0	A	74	E
	EB	0	49	D	139	F	19	B	21	B
Alta Dr and Shadow Ln.	NB	0	54	D	58	E	49	D	63	E
	SB	1	52	D	79	E	27	C	68	E
	WB	0	14	B	64	E	11	A	10	A
	EB	34	190	F	219	F	191	F	189	F
Alta Dr. and MLK	NB	14	75	E	80	E	88	F	75	E
	SB	47	145	F	126	F	224	F	148	F
	WB	6	45	D	79	E	34	C	35	C
	EB	2	191	F	426	F	105	F	104	F
Bonneville Ave. and Grand Central Pkwy.	NB	0	42	D	52	D	38	D	43	D
	SB	34	130	F	150	F	140	F	128	F
	WB	0	18	B	43	D	10	A	11	B
	EB	4	32	C	70	E	20	B	18	B
Bonneville Ave. and Main St.	NB	15	265	F	752	F	65	E	91	F
	SB	15	130	F	113	F	106	F	128	F
	WB	1	28	C	28	C	17	B	28	C
	EB	2	14	B	17	B	13	B	8	A

Speed, Density and LOS are based on served volumes
Source: CH2M HILL

**Table 13: CORSIM Intersection Analysis Results
No Build - Year 2030 - PM Peak**

Intersections	Approach	Phase Failure	Control Delay							
			Total		Left		Right		Through	
			Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)
Sahara Ave. and Rancho Dr.	NB	1	18	B	0	A	18	B	0	A
	SB	28	213	F	210	F	207	F	218	F
	WB	0	17	B	0	A	9	A	11	B
	EB	48	172	F	779	F	68	E	106	F
Sahara Ave. and I-15 NB Ramps	NB	0	113	F	47	D	157	F	0	A
	WB	18	134	F	0	A	177	F	108	F
	EB	20	44	D	118	F	0	A	18	B
Oakey Blvd. and MLK	SB	0	7	A	11	A	4	A	0	A
	WB	0	0	A	0	A	0	A	0	A
	EB	0	243	F	456	F	0	A	128	F
Western Ave. and Wyoming Ave.	NB	37	211	F	235	F	137	F	219	F
	SB	23	88	F	82	F	98	F	93	F
	WB	18	62	E	117	F	66	E	59	E
	EB	1	24	C	64	E	3	A	19	B
MLK-Industrial Rd. and Wyoming Ave.	NB	18	223	F	471	F	91	F	114	F
	SB	17	155	F	167	F	157	F	151	F
	WB	17	177	F	158	F	183	F	185	F
	EB	6	39	D	107	F	14	B	20	B
Grand Central Pkwy. and I-15 Ramps	NB	3	36	C	0	A	0	A	36	C
	SB	26	160	F	276	F	39	D	200	F
	WB	1	31	C	0	A	35	C	29	C
	EB	10	52	D	0	A	34	C	54	D
Grand Central Pkwy. and Outlet Mall	NB	1	8	A	18	B	8	A	7	A
	SB	25	315	F	0	A	289	F	325	F
	WB	21	89	F	574	F	19	B	62	E
	EB	22	207	F	266	F	162	F	0	A
MLK and I-15 SB Off-Ramp	NB	0	5	A	0	A	0	A	5	A
	SB	19	97	F	0	A	0	A	97	F
	WB	1	33	C	0	A	0	A	33	C
Charleston Blvd. and Shadow Ln.	NB	49	316	F	262	F	263	F	461	F
	SB	1	33	C	55	D	6	A	63	E
	WB	0	5	A	36	C	2	A	2	A
	EB	38	79	E	232	F	72	E	62	E

**Table 13 (continued): CORSIM Intersection Analysis Results
No Build - Year 2030 - PM Peak**

Intersections	Approach	Phase Failure	Control Delay							
			Total	Left	Right	Through				
			Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)	Delay (second/ veh)	LOS (HCM 2000 Criteria)
Charleston Blvd. and MLK	NB	2	44	D	57	E	8	A	45	D
	SB	0	86	F	108	F	63	E	70	E
	WB	15	75	E	110	F	45	D	68	E
	EB	17	94	F	73	E	95	F	94	F
Charleston Blvd. and Grand Central Pkwy.	NB	24	141	F	176	F	50	D	148	F
	SB	14	477	F	803	F	50	D	434	F
	WB	29	64	E	164	F	34	C	63	E
	EB	9	18	B	115	F	2	A	14	B
Charleston Blvd. and Commerce St.	NB	2	53	D	93	F	18	B	0	A
	WB	2	18	B	0	A	0	A	18	B
	EB	1	7	A	0	A	5	A	7	A
Charleston Blvd. and Main St.	NB	12	284	F	581	F	153	F	184	F
	SB	38	126	F	146	F	134	F	113	F
	WB	49	168	F	181	F	175	F	167	F
	EB	1	27	C	94	F	0	A	14	B
Alta Dr. and Shadow Ln.	NB	10	115	F	116	F	109	F	124	F
	SB	0	44	D	52	D	27	C	53	D
	WB	0	15	B	46	D	8	A	10	A
	EB	4	32	C	85	F	23	C	26	C
Alta Dr. and MLK	NB	7	29	C	95	F	24	C	25	C
	SB	28	246	F	262	F	234	F	249	F
	WB	3	128	F	282	F	48	D	57	E
	EB	0	106	F	181	F	44	D	58	E
Bonneville Ave. and Grand Central Pkwy.	NB	0	30	C	37	D	22	C	33	C
	SB	38	342	F	240	F	343	F	371	F
	WB	20	75	E	360	F	22	C	28	C
	EB	24	108	F	93	F	351	F	46	D
Bonneville Ave. and Main St.	NB	3	36	D	87	F	10	A	18	B
	SB	28	302	F	268	F	367	F	262	F
	WB	7	61	E	56	E	63	E	62	E
	EB	2	32	C	45	D	20	B	22	C

Speed, Density and LOS are based on served volumes
Source: CH2M HILL

The comparison of existing and proposed number of lanes on I-15, within the project, are shown in the following table.

Table 8 (modified)*: Future Traffic Volumes and Number of Lanes							
Segment	Direction	Description	Segment Length (Mile)	Future Build (2030) Traffic Volumes DHV		No Build No. of Lanes	Proposed No. of Lanes
				AM	PM		
1	NB	Southern end to Sahara Ave.	0.70	13,100	15,150	3GP + 1 AUX	2 HOV+4GP+2AUX
2	NB	Sahara Ave. to HOV Ramps	0.92	8,300	8,900	3GP + 2 AUX	2HOV+3GP
3	NB	HOV Ramps to Charleston Blvd.	0.28	7,700	8,200	3GP + 1 AUX	2HOV+4GP
4	NB	Charleston Blvd. to Alta Dr.	0.58	11,300	11,100	3GP + 1 AUX	2HOV+5GP
5	NB	Alta Dr. to US95	0.58	7,600	9,400	3GP + 2 AUX	2HOV+4GP
6	NB	U.S. 95 to Washington Ave.	0.84	5,200	5,100	3GP	4GP
7	SB	Southern end to Sahara Ave.	0.70	13,100	12,600	4GP+1AUX	2HOV+5GP
8	SB	Ramps	0.92	11,200	10,500	4GP	2HOV+5GP
9	SB	HOV Ramps to Charleston Blvd.	0.28	11,500	9,200	4GP+1AUX	2HOV+3GP
10	SB	Charleston Blvd. to Alta Dr.	0.58	10,100	8,700	4GP	2HOV+4GP
11	SB	Alta Dr. to US 95	0.58	9,600	8,900	3GP + 1 AUX	2HOV+5GP
12	SB	U.S. 95 to Washington Ave.	0.84	6,100	5,900	3GP	3GP

HOV – High-Occupancy Vehicle Lanes
 GP – General Purpose Lanes
 AUX – Auxiliary Lanes

In addition to the lanes shown here, the collector-distributor (direct connect) roads outside of the mainlines contain from 2 to 3 lanes in each direction.

*This table is contained in the Change in Control of Access Report (CCOAR) and modified here to include the existing number of lanes as shown on Figure 19 of CCOAR. No additional information or modifications have been presented here.

The addition of the Martin L. King to Industrial Road direct connect flyover and connecting Grand Central Parkway to Western Avenue will provide two much needed north/south arterial connections, allowing more of the local trips to take place on the arterials, rather than on I-15.

The intersection levels-of-service, for the improved intersections within the project limits, show marked improvements, as shown in the following tables taken from the Change in Control of Access Report.

**Table 18: CORSIM Intersection Analysis Results
Alternative G AM Peak**

Intersections	Approach	Phase Failures	Control Delay							
			Total		Left		Right		Through	
			Delay (second/veh)	LOS (HCM 2000 Criteria)						
Sahara Ave. and Rancho Dr.	NB	0	1	A	0	A	1	A	0	A
	SB	4	67	E	69	E	32	C	75	E
	WB	0	10	A	18	B	3	A	8	A
	EB	0	34	C	64	E	24	C	31	C
Sahara Ave. and I-15 NB Ramps	NB	0	28	C	32	C	25	C	0	A
	WB	0	26	C	0	A	2	A	34	C
	EB	6	27	C	73	E	0	A	11	A
Western Ave. and Wyoming Ave.	NB	0	40	D	62	E	8	A	57	E
	SB	6	34	C	37	D	17	B	32	C
	WB	6	24	C	84	F	10	A	26	C
	EB	0	38	D	55	D	9	A	33	C
Wyoming Ave. and MLK-Industrial Connector	SB	0	52	D	60	E	29	C	0	A
	WB	6	38	D	0	A	31	C	39	D
	EB	0	18	B	57	E	0	A	7	A
MLK-Industrial and Wyoming Ave. Connector	NB	1	23	C	46	D	0	A	13	B
	SB	0	4	A	0	A	1	A	5	A
	EB	0	20	B	53	D	11	B	0	A
Western Ave. and HOV Connector	NB	0	24	C	43	D	0	A	6	A
	SB	0	15	B	0	A	2	A	23	C
	EB	0	26	C	41	D	9	A	0	A
HOV Connector and I-15 HOV Ramps	NB	0	4	A	0	A	4	A	0	A
	SB	0	6	A	6	A	0	A	0	A
	WB	0	21	C	38	D	1	A	0	A
Western Ave. and S Jug Handles	NB	0	26	C	0	A	7	A	33	C
	SB	0	29	C	54	D	0	A	22	C
	WB	0	21	B	26	C	13	B	0	A
Grand Central Pkwy. and N Jug Handles	NB	0	13	B	0	A	7	A	16	B
	SB	0	25	C	38	D	0	A	5	A
	WB	0	41	D	48	D	9	A	0	A
Charleston Blvd. and Shadow Ln.	NB	0	49	D	72	E	17	B	68	E
	SB	0	49	D	62	E	5	A	59	E
	WB	0	12	B	80	E	1	A	10	A
	EB	0	15	B	45	D	1	A	11	B
Charleston Blvd. and I-15 SB Ramps	SB	0	37	D	45	D	19	B	0	A
	WB	0	22	C	52	D	0	A	2	A
	EB	0	18	B	0	A	3	A	19	B

**Table 18: CORSIM Intersection Analysis Results
Alternative G AM Peak**

Intersections	Approach	Phase Failure	Control Delay							
			Total		Left		Right		Through	
			Delay (second/veh)	LOS (HCM 2000 Criteria)						
Charleston and I-15 NB Ramps	NB	0	22	C	52	D	3	A	0	A
	WB	0	8	A	0	A	1	A	8	A
	EB	0	8	A	32	C	0	A	5	A
Charleston Blvd. and Jug Handles	NB	0	3	A	0	A	3	A	0	A
	SB	0	4	A	0	A	4	A	0	A
	WB	0	11	B	0	A	0	A	13	B
	EB	0	0	A	0	A	0	A	0	A
Charleston Blvd. and Commerce St.	NB	0	50	D	64	E	27	C	0	A
	WB	0	0	A	0	A	0	A	0	A
	EB	0	3	A	0	A	4	A	3	A
Charleston Blvd. and Main St.	NB	1	61	E	65	E	47	D	59	E
	SB	5	45	D	36	C	50	D	44	D
	WB	0	50	D	56	E	47	D	49	D
	EB	0	36	C	37	D	34	C	35	C
Alta Dr. and Shadow Ln.	NB	0	34	C	52	D	11	B	49	D
	SB	0	63	E	75	E	42	D	75	E
	WB	0	6	A	74	E	0	A	1	A
	EB	0	13	B	68	E	8	A	12	B
Alta Dr. and MLK Blvd.	NB	0	27	C	59	E	21	B	26	C
	SB	17	51	D	98	F	31	C	49	D
	WB	3	30	C	48	D	7	A	35	C
	EB	0	35	C	49	D	23	C	30	C
Alta Dr. and I-15 NB Off-Ramp	NB	0	27	C	53	D	11	B	0	A
	WB	0	3	A	0	A	1	A	3	A
	EB	0	7	A	0	A	0	A	7	A
Bonneville Ave. and Grand Central Pkwy.	NB	1	41	D	60	E	16	B	56	E
	SB	2	45	D	70	E	17	B	47	D
	WB	1	24	C	56	E	5	A	19	B
	EB	0	25	C	56	E	5	A	17	B
Bonneville Ave. and Main St.	NB	1	37	D	61	E	24	C	28	C
	SB	8	64	E	55	D	70	E	62	E
	WB	0	35	C	34	C	32	C	35	C
	EB	0	18	B	27	C	2	A	13	B

Speed, Density and LOS are based on served volumes
Source: CH2M HILL

**Table 19 CORSIM Intersection Analysis Results
Alternative G PM Peak**

Intersections	Approach	Phase Failures	Control Delay							
			Total		Left		Right		Through	
			Delay (second/veh)	LOS (HCM 2000 Criteria)						
Sahara Ave. and Rancho Dr.	NB	0	2	A	0	A	2	A	0	A
	SB	0	50	D	54	D	39	D	57	E
	WB	0	39	D	66	E	14	B	35	C
	EB	14	71	E	125	F	93	F	55	D
Sahara Ave. and I-15 NB Ramp	NB	1	35	C	40	D	31	C	0	A
	WB	28	82	F	0	A	4	A	132	F
	EB	0	19	B	56	E	0	A	4	A
Western Ave. and Wyoming Ave.	NB	8	51	D	72	E	29	C	61	E
	SB	7	27	C	34	C	11	A	30	C
	WB	0	17	B	55	D	4	A	21	B
	EB	0	43	D	67	E	4	A	32	C
and MLK-Industrial Connector	SB	0	47	D	56	E	11	A	0	A
	WB	0	15	B	0	A	11	A	17	B
	EB	0	10	A	31	C	0	A	5	A
MLK-Industrial and Wyoming Ave. Connector	NB	0	17	B	29	C	0	A	16	B
	SB	0	2	A	0	A	0	A	2	A
	EB	0	23	C	47	D	12	B	0	A
Western Ave. and HOV Connector	NB	0	30	C	55	E	0	A	12	B
	SB	1	23	C	0	A	8	A	41	D
	EB	0	25	C	40	D	10	A	0	A
HOV Connector and I-15 HOV Ramp	NB	0	3	A	0	A	3	A	0	A
	SB	0	8	A	8	A	0	A	0	A
	WB	0	26	C	37	D	1	A	0	A
Western Ave. and S Jug Handles	NB	0	8	A	0	A	2	A	9	A
	SB	0	15	B	66	E	0	A	2	A
	WB	0	38	D	59	E	14	B	0	A
Grand Central Pkwy. and N Jug Handles	NB	0	15	B	0	A	10	A	18	B
	SB	0	22	C	39	D	0	A	3	A
	WB	0	49	D	65	E	7	A	0	A
Charleston Blvd. and Shadow Ln.	NB	0	51	D	61	E	22	C	58	E
	SB	0	36	D	54	D	10	A	48	D
	WB	0	20	B	52	D	2	A	19	B
	EB	1	29	C	68	E	9	A	25	C
Charleston Blvd. and I-15 SB Ramp	SB	0	26	C	36	D	9	A	0	A
	WB	0	1	A	1	A	0	A	1	A
	EB	0	15	B	0	A	3	A	19	B

**Table 19 CORSIM Intersection Analysis Results
Alternative G PM Peak**

Intersections	Approach	Phase Failures	Control Delay							
			Total		Left		Right		Through	
			Delay (second/veh)	LOS (HCM 2000 Criteria)						
Charleston and I-15 NB Ramp	NB	0	16	B	44	D	2	A	0	A
	WB	0	26	C	0	A	3	A	33	C
	EB	0	0	A	1	A	0	A	0	A
Charleston Blvd. and Jug Handles	NB	0	2	A	0	A	2	A	0	A
	SB	0	17	B	0	A	17	B	0	A
	WB	0	19	B	0	A	0	A	24	C
	EB	0	0	A	0	A	0	A	0	A
Charleston Blvd. and Commerce St.	NB	0	39	D	54	D	15	B	0	A
	WB	0	2	A	0	A	0	A	2	A
	EB	0	2	A	0	A	2	A	2	A
Charleston Blvd. and Main St.	NB	2	686	F	972	F	390	F	435	F
	SB	27	151	F	156	F	144	F	156	F
	WB	21	330	F	1508	F	145	F	151	F
	EB	0	17	B	54	D	8	A	8	A
Alta Dr. and Shadow Ln.	NB	0	44	D	64	E	15	B	59	E
	SB	0	51	D	66	E	25	C	68	E
	WB	0	8	A	64	E	1	A	6	A
	EB	0	16	B	62	E	6	A	12	B
Alta Dr. and MLK Blvd.	NB	0	19	B	38	D	14	B	16	B
	SB	10	44	D	95	F	24	C	46	D
	WB	14	40	D	90	F	25	C	30	C
	EB	13	64	E	138	F	23	C	44	D
Alta Dr. and I-15 NB Off-Ramp	NB	0	24	C	55	D	11	A	0	A
	WB	0	3	A	0	A	2	A	4	A
	EB	0	0	A	0	A	0	A	0	A
Bonneville Ave. and Grand Central Pkwy.	NB	0	42	D	40	D	18	B	60	E
	SB	1	41	D	51	D	16	B	53	D
	WB	0	24	C	47	D	9	A	20	B
	EB	0	22	C	55	E	2	A	15	B
Bonneville Ave. and Main St.	NB	1	33	C	76	E	15	B	16	B
	SB	24	156	F	125	F	190	F	136	F
	WB	0	35	C	34	C	35	C	35	C
	EB	0	31	C	49	D	3	A	22	C

Speed, Density and LOS are based on served volumes
Source: CH2M HILL

I-15 also shows definite improvements in operations, as shown in the following “brain scans”, which demonstrate graphically speeds on the facility. These figures were also provided in the change in Control of Access Report.

Figure 20: No Build Alternative Speeds - Year 2030

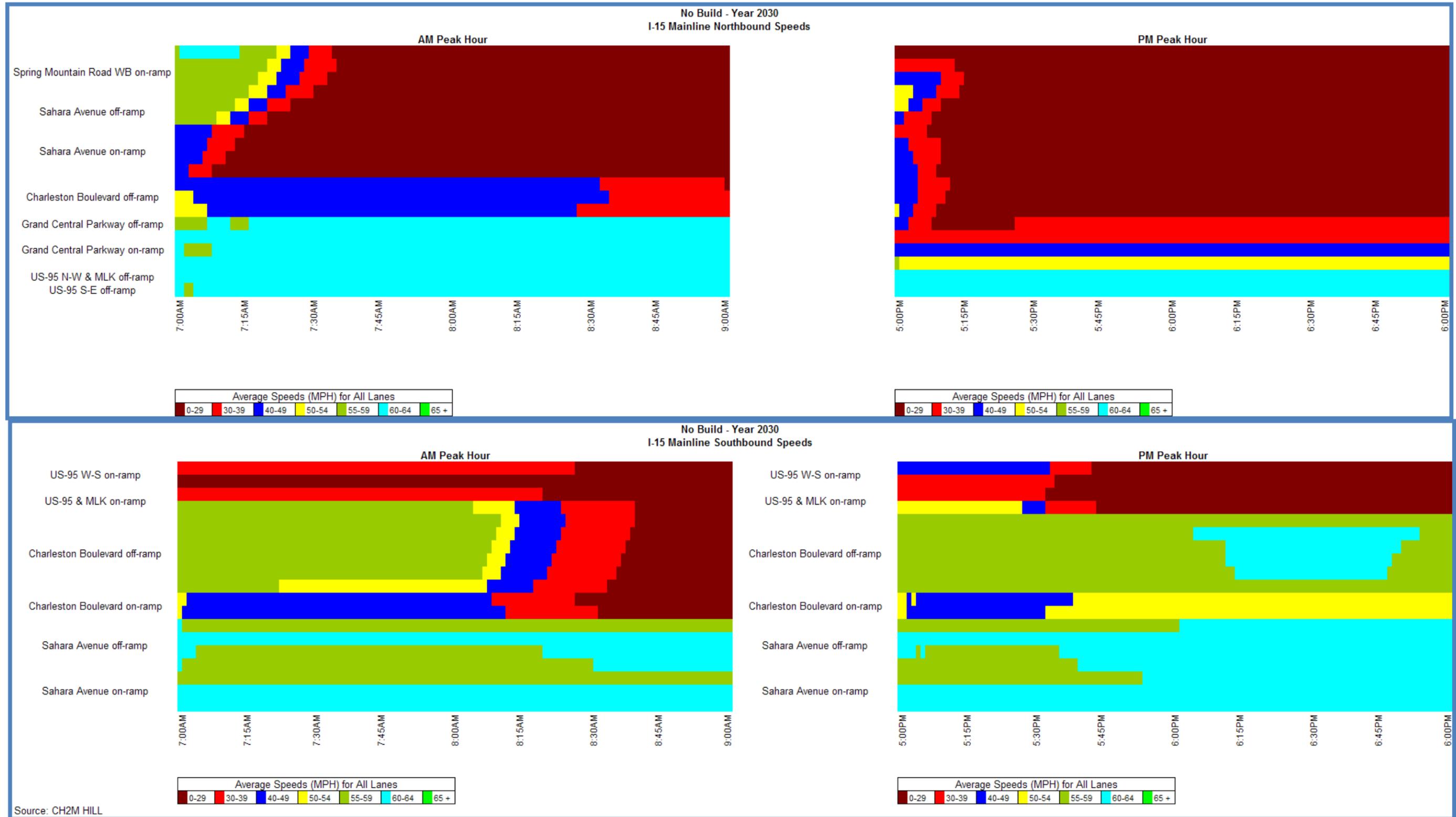
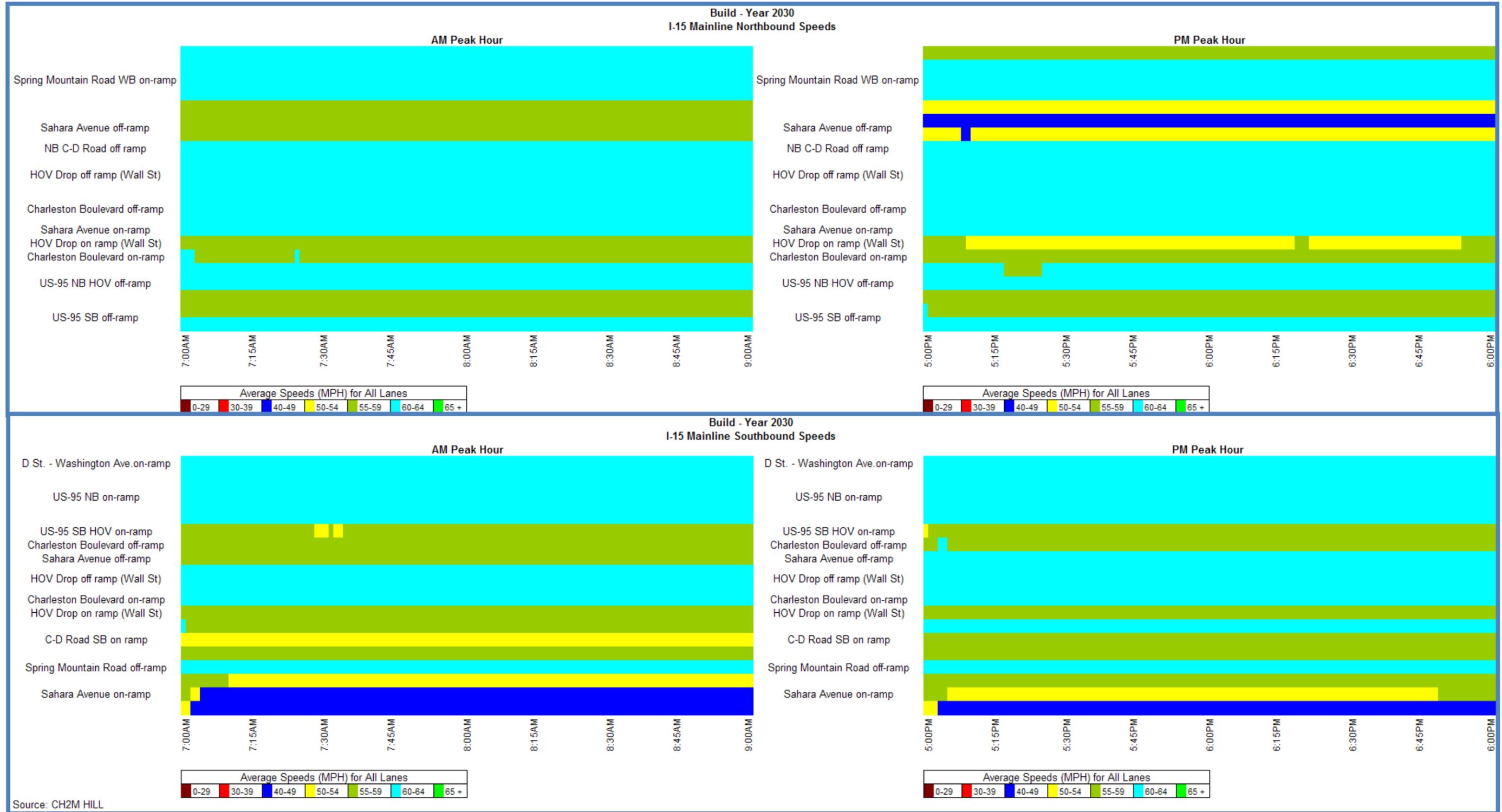


Figure 22: Alternative G Mainline Speeds - Year 2030



FW Revised - Project NEON Project of Air Quality Concern Documentation.txt

From: OConnor.Karina@epamail.epa.gov [mailto:OConnor.Karina@epamail.epa.gov]
Sent: Thursday, October 21, 2010 3:18 PM
To: Visser, Hannah (FHWA)
Subject: Re: Revised - Project NEON: Project of Air Quality Concern Documentation

Hannah - As mentioned in our phone call. Circulation and review of these documents meets our needs for interagency consultation and can serve for the hot spot analysis to complete the project-level conformity requirements for this project.

thanks,

Karina O' Connor
(775) 833-1276
oconnor.karina@epa.gov
From:
<Hannah.Visser@dot.gov>
To:
Karina OConnor/R9/USEPA/US@EPA, <Greg.Novak@dot.gov>, <Jeff.Houk@dot.gov>, <scooke@dot.state.nv.us>
Cc:
<Susan.KLEKAR@dot.gov>, <Paul.Schneider@dot.gov>, <Abdelmoez.Abdalla@dot.gov>
Date:
10/21/2010 01:13 PM
Subject:
Revised - Project NEON: Project of Air Quality Concern Documentation

Please find attached the revised PM10 documentation for Project NEON. The attached form references the Final EIS for Project NEON. A link to the online document is also provided below for easy access.

<http://www.ndotprojectneon.com/>

Please let me know if you have questions or need any clarification regarding this information.

Thank you,
Hannah

Hannah Visser
Planning & Research Program Manager
Federal Highway Administration - Nevada Division Office
705 North Plaza Street, Suite 220, Carson City, NV 89701
(775) 687-5322 - Phone
(775) 687-3803 - Fax
hannah.visser@dot.gov

[attachment "PM-HotSpot-Form_NEON_20101020.pdf" deleted by Karina OConnor/R9/USEPA/US] [attachment "Attachment 3_Summary of Traffic Impacts.pdf" deleted by Karina OConnor/R9/USEPA/US]