

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WESTERN-PACIFIC REGION

Finding of No Significant Impact

**for the
Proposed Dermody Properties Logistics Park at
Reno-Stead Airport in
Washoe County, Nevada**



For further information:

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GENERAL INFORMATION ABOUT THIS DOCUMENT

WHAT'S IN THIS DOCUMENT? This document is the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) for the proposed Dermody Properties Logistic Park at Reno-Stead Airport located in Reno, Washoe County, Nevada. This document includes the FAA's determinations and approvals for the proposed federal action described in the Final Environmental Assessment (Final EA) dated January 2022. This document discusses all alternatives considered by the FAA in reaching its decision and briefly summarizes the potential environmental consequences of the Proposed Action and the No Action Alternative, which were evaluated in detail in the Final EA.

WHAT'S HAPPENED TO DATE? The Reno-Tahoe Airport Authority (RTAA) published a Notice of Availability for the Draft Environmental Assessment (Draft EA) on September 28, 2021. The Draft EA was available for public review from September 28 to October 29, 2021. The RTAA received four responses containing a total of 25 comments on the Draft EA. The FAA considered the public's comments and prepared a Final EA in January 2022.

WHAT SHOULD YOU DO? Read this FONSI to understand the actions that FAA intends to take in connection with the proposed Dermody Properties Logistic Park at Reno-Stead Airport.

WHAT HAPPENS NEXT? The FAA may approve RTAA's land-use change request and process the land-obligation release. Then, RTAA may start implementing their project, which is the Dermody Properties Logistic Park located at Reno-Stead Airport.

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT**

**PROPOSED DERMODY PROPERTIES LOGISTICS PARK
RENO-STEAD AIRPORT
WASHOE COUNTY, NEVADA**

1. Introduction

The Federal Aviation Administration (FAA) provides this document as its issuance of a Finding of No Significant Impact (FONSI) associated with the proposed Dermody Properties Logistics Park (Project) located at Reno-Stead Airport (Airport) located in Reno, Washoe County, Nevada. The FAA based this decision on information and analysis presented in the Final EA, dated January 2022, which the FAA incorporates by reference. The FAA started its review in August 2020 and prepared the Final EA per the National Environmental Policy Act (NEPA), the Council on Environmental Quality Regulations (40 CFR § 1500-1508), and FAA Order 1050.1F. The FAA's applicant, Reno-Tahoe Airport Authority (RTAA), which owns and operates the Airport, requested a release from a land-use obligation related to the Surplus Property Act. On June 20, 2019 and December 17, 2020, the FAA determined that it had authority¹ to approve or disapprove a change in land use from aeronautical to non-aeronautical for the proposed Project.²

2. Purpose and Need

The FAA's overall purpose and need is to fulfill its statutory mission, which is to ensure the safe and efficient use of navigable airspace in the United States.³ In this case, the FAA needs to respond to RTAA's request for a release from a federal land obligation and consider the following:

- The reasonableness and practicality of the request;
- The effect of the request on needed aeronautical facilities;
- The net benefit to civil aviation; and
- The compatibility of the proposal with the needs of civil aviation.⁴

¹ Section 163(b) of the FAA Reauthorization Act of 2018, Pub.L. 115-254 (2018)

² Letter, Mike N. Williams to Marily M. Mora, June 20, 2019 and Letter, Mike N. Williams to Daren Griffin, December 17, 2020.

³ 49 U.S.C. Section 47101(a)(1)

⁴ FAA Order 5190.68 Section 22.4a

3. Proposed Action and FAA Action

The FAA proposes to approve the land release and land-use change forms submitted by RTAA for a 178.5-acre portion of airport property (Property). FAA's Proposed Action would enable RTAA's Project to proceed.

RTAA's Project, called the Dermody Properties Logistic Park, includes three components:

1. RTAA requesting the release of the Property from a federal land obligation;
2. A private developer constructing and operating two warehouse and distribution buildings, landscaping and vehicle parking lots on a 56.4-acre-portion of the Property; and
3. A private developer installing and maintaining ancillary roads, drainage improvements, and utilities on the Property.

4. Reasonable Alternatives Considered

The FAA studied two alternatives in the Final EA, which are the Proposed Action and the No Action Alternative. The FAA didn't examine other alternatives, because RTAA's screening didn't identify any reasonable and feasible ones and the Proposed Action doesn't involve any unresolved resource conflicts.

The RTAA screened alternatives for the Project including locations on and off Airport and creating other sources of income for the Airport. The selection criteria consisted of the following questions:

- Would the alternative provide a sustainable source of revenue that would support the long-term viability of the Airport?
- Would the alternative impact the safe and efficient operation of aircraft or have an adverse effect on the value of prior federal investments?
- Would the alternative result in airspace obstructions at the Airport or obstruct safety areas?
- Would the alternative be consistent with the Master Development Agreement for the Property? and
- Is there a developer willing to construct this alternative within the next five years (i.e., before the end of 2026)?

The RTAA selected the only location, which occurs in the Airport's southwest corner adjacent to an existing, off-airport industrial park, and revenue stream (i.e., lease) that meet these criteria for inclusion in the Project.

5. Assessment

The FAA considered the Proposed Action's and the No Action Alternative's potential environmental impacts, which were identified and evaluated in the Final EA. The Final EA didn't analyze in detail the following environmental impact categories, or portions of categories, listed in Table 3A, because the associated resources were absent or impacts were negligible:

- Biological Resources (federally listed species and critical habitat)
- Coastal Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Water Resources (floodplains, wetlands, wild and scenic rivers)

The FAA analyzed the following environmental impact categories in detail in the Final EA in Section 4. A summary the Proposed Action's impacts is also provided below.

A. Air Quality. The Final EA in Section 4.3 compared the estimated total annual emissions for criteria pollutants that would result from the Proposed Action with the *de minimis* thresholds. The analysis concluded that emissions for all applicable pollutants would be less than the general conformity *de minimis* thresholds. Therefore, the Proposed Action wouldn't result in significant impacts to air quality.

B. Biological Resources (non-federally listed species). The Final EA in Section 4.4 stated that the Proposed Action would result in the removal and loss of 56.4 acres of sagebrush habitat available for use by nesting birds protected by Migratory Bird Treaty Act, bats, mule deer, and other non-listed wildlife species. This area is a tiny (0.002%) portion of the 3,048,694 acres of sagebrush habitat present within Washoe County. The Proposed Action includes avoidance and minimization measures listed in the Final EA in Section 4.4.4 that meet the requirements of the Migratory Bird Treaty Act, lessen impacts to bats, and minimize sagebrush habitat loss. Therefore, the Proposed Action wouldn't result in significant impacts to biological resources.

C. Climate. The Final EA in Section 4.5 calculated the types and amounts of greenhouse gases (GHG) that the Proposed Action would emit. The Proposed Action's highest release during construction would be 1,708.3 metric tons per year of CO₂ equivalent, and during operations, 26,057.2 metric tons per year of CO₂ equivalent. The Proposed Action's operations would represent a 1.6 percent increase over the commercial/industrial land use total in the 2010 GHG inventory for Washoe County. The FAA conducted this analysis for disclosure purposes only, because the FAA hasn't established significance thresholds or factors to consider for GHG emissions.

D. Hazardous Materials, Solid Waste, and Pollution Prevention. The Final EA in Section 4.6 noted the following items:

1. The Property associated with the Proposed Action is located 750 feet west of a former source of groundwater contamination, and a cleanup was completed.
2. The Project's use, generation, or storage of hazardous materials would be subject to all applicable federal, state, and local requirements.
3. The Project's construction and operation would generate solid waste representing less than one percent of the daily solid waste accepted at the nearby Lockwood Regional Landfill. This landfill has a life expectancy of more than 100 years.
4. Stormwater pollution prevention plans would be created or modified to cover the Project's construction and operations.
5. The Proposed Action includes avoidance and treatment measures for hazardous materials and pollution prevention listed in the Final EA in Sections 4.6.1.4 and 4.6.3.4.

Therefore, the Proposed Action wouldn't result in significant impacts related to hazardous materials, solid waste, and pollution prevention.

E. Historical, Architectural, Archaeological, and Cultural Resources. The Final EA in Section 4.7 noted that Proposed Action would result in 56.4 acres of ground disturbance and erection of two new buildings on a currently vacant parcel. An archaeological survey identified 14 sites and 10 isolated objects within the Property, and architectural survey recorded 21 buildings, districts, and structures located on or adjacent to the Property. Evidence for the California Emigrant Trail, which is a braided trail known to occur 2.5 miles to the south, wasn't observed on the Property.

The FAA determined that the sites, isolated objects, and all but one of the buildings, districts, and structures were ineligible for inclusion in the National Register of Historic Places (NRHP). FAA found that the Lear Hangar, located adjacent to the Property, was eligible for inclusion in the NRHP. The FAA found that the Proposed Action would have "no adverse effect" to historic properties, since the Proposed Action's new buildings would be constructed at least 1,625 feet away from and behind the Lear Hangar. The Nevada State Historic Preservation Officer concurred with the finding as well as the FAA's eligibility determinations on September 7, 2021. The FAA initiated consultation with Indian tribes, but received no responses.

The Proposed Action includes an avoidance and minimization measure listed in the Final EA in Section 4.7.4 that set procedures for responding to a discovery of previously unconsidered or unknown cultural resources. Therefore, the Proposed Action wouldn't result in significant impacts to historical, architectural, archaeological, and cultural resources.

F. Land Use. The Final EA in Section 4.8 compared the Proposed Action to existing land use plans and requirements. The Proposed Action would be consistent with City of Reno's general land use plan and the RTAA's airport layout plan for the Airport. The Proposed Action wouldn't penetrate protected airspace surfaces. The Proposed Action includes avoidance and

minimization measures listed in the Final EA in Section 4.8.4 for obtaining permits and following zoning regulations. Therefore, the Proposed Action wouldn't result in significant impacts to land use.

G. Natural Resources and Energy Supply. The Final EA in Section 4.9 evaluated the Proposed Action's electricity, natural gas, and water needs. Local providers didn't identify supply issues or system constraints associated with serving the Project. Therefore, the Proposed Action wouldn't result in significant impacts to natural resources and energy supply.

H. Noise and Noise-Compatible Land Use. The Final EA in Section 4.10 stated that the Proposed Action would generate noise from construction equipment and motor vehicles, such as semi-trucks. Temperature-sensitive construction activities, such as concrete pouring, would occur during night-time and early morning hours, on as many as 62 occasions. The nearest residence occurs 278 feet away from proposed grading activities associated with drainage improvements and 651 feet away from the proposed construction and operational activities associated with the buildings. The Proposed Action's noise wouldn't exceed daytime or nighttime levels set by the City of Reno's municipal code for activities located adjacent to residential areas (see Section 3.11.1 in the Final EA). Therefore, the Proposed Action wouldn't result in significant impacts related to noise and noise-compatible land use.

I. Socioeconomic Impacts, Environmental Justice, and Children's Environmental Health and Safety Risks. The Final EA in Section 4.11 noted the following items:

1. The Proposed Action would generate 225 full-time equivalent jobs during the Project's 28-month-long construction phase. This impact wouldn't represent a long-term change in the community tax base, induce long-term growth, unreasonably increase demand for housing in Washoe County, disrupt local traffic patterns, substantially reduce level-of-service for roads and intersections, or close roads.
2. The Proposed Action wouldn't require relocation of businesses or residences and wouldn't disrupt or physically divide a community.
3. The Proposed Action would generate opportunities for 400 full-time equivalent jobs during the Project's years-long operations phase. This impact would represent a negligible increase in the community tax base, long-term growth, and demand for housing in Washoe County. It would generate 1,945 average daily trips, and traffic volumes studies showed that only one intersection (i.e., eastbound at Stead Boulevard and Mt. Babcock Street) would operate below regional guidelines. However, the resulting traffic delay at that intersection would be less than five seconds, which wouldn't warrant treatment.
4. The Proposed Action wouldn't cause disproportionately high or adverse impacts to an environmental justice population.
5. The Proposed Action wouldn't create health and safety impacts to children. The Proposed Action includes avoidance and minimization measures listed in the Final EA in Section 4.11.3.4 for fencing work areas during construction to prevent unauthorized access.

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Therefore, the Proposed Action wouldn't result in significant impacts to socioeconomic factors Environmental Justice communities or children's environmental health and safety.

J. Visual Effects. The Final EA in Section 4.12 noted the following items:

1. The Proposed Action would result in the temporary installation and use of flood lights on as many as 62 occasions during the Project's construction phase, because temperature-sensitive construction activities, such as concrete pouring, would occur during night-time and early morning hours. The nearest residence occurs 651 feet away from the Project's building construction site.
2. The Proposed Action would result in the permanent installation use of pole-mounted, shielded, exterior lights during the Project's operation phase. Lighting for driveways and parking lots would be 550 feet from the nearest residence.
3. The Proposed Action would result in development on a vacant parcel (i.e., the Property) that is consistent with the visual character of the general area. The Property borders airport and light-industrial developments on three sides. The Project's buildings would be visible from the rear of 18 residences situated adjacent to the Property, however, they would occur at least 651 feet away. The Project's buildings would obstruct views of the airport and distant mountains from seven residences.
4. The Proposed Action includes avoidance and minimization measures listed in the Final EA in Section 4.12.1.4 for directing night-time lighting downwards to minimize spillage into residential areas, notifying residents prior to night-time construction, and obtaining a lighting plan approval from the City of Reno.

Therefore, the Proposed Action wouldn't result in significant impacts to visual resources or visual character.

K. Water Resources. The Final EA in Section 4.13 noted the following:

1. The Proposed Action would disturb 56.4 acres during the Project's construction and increase impervious surfaces by 44.6 acres after construction.
2. Within the Property, groundwater was encountered at a depth of 16 feet in one sample location and at 18 feet in other locations. The Proposed Action would temporarily pump groundwater as needed to control seepage into deep excavations for utility installation during the Project's construction. The Proposed Action wouldn't impact groundwater during the Project's operations, because it would be connected to the City of Reno's water and sewage system.
3. The Proposed Action includes avoidance and minimization measures listed in the Final EA in Section 4.13.1.4 that best management practices would be used to minimize water quality impacts during the Project's construction and stormwater pollution prevention plans would be created or modified to cover the Project's construction and operations.

Therefore, the Proposed Action wouldn't result in significant impacts to water resources.

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L. Cumulative Impacts. The Final EA in Sections 3.15 and 4.14 discussed the past, present, and reasonably foreseeable projects located at and within two miles of the Airport. These projects would impact air quality; climate; biological resources (non-listed species); hazardous materials, solid waste and pollution prevention; natural resources and energy supply; noise and noise-compatible land use; socioeconomics, environmental justice, visual effect, and water resources (surface and groundwater) when added to the Proposed Action's impacts wouldn't exceed significance thresholds or factors to be considered. Therefore, the Proposed Action wouldn't result in significant cumulative impacts.

6. Public Participation

The RTAA made the Draft EA available to the public for a 30-day-long review period from September 28, through October 29, 2021 and published a Notice of Availability in the *Reno Gazette Journal* on September 28, 2021. RTAA placed a review copy of the Draft EA at the North Valleys Library and at the Airport as well as posting it on its website at <https://www.renoairport.com/reno-stead/property-tenants/stead-planning-documents>. RTAA received four responses containing a total of 25 comments. The Final EA in Section 5.3 describes the comments and the FAA's response.

7. Inter-Agency Coordination

The FAA found that further coordination with the U.S. Department of the Interior or the U.S. Environmental Protection Agency isn't necessary per 49 U.S.C. § 47101(h). The Proposed Action doesn't involve construction of a new airport, new runway, or major runway extension that has a significant impact on:

- natural resources including fish and wildlife;
- natural, scenic, and recreational assets;
- water and air quality; or
- another factor affecting the environment.

8. Reasons for the Determination that the Proposed Action will have No Significant Impacts

In the attached Final EA, the FAA examined the environmental impact categories that could be present at the Proposed Action's location or impacted by the Proposed Action. The Final EA showed that Proposed Action wouldn't involve any environmental impacts that exceed the threshold of significance as defined by FAA Orders 1050.1F and 5050.4B. Based on the information contained in this FONSI and supported by the detailed discussion in the Final EA, the FAA selected the Proposed Action alternative as described in Section 3 of this FONSI.

*Finding of No Significant Impact for the
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9. Finding of No Significant Impact

I carefully and thoroughly considered the facts contained in the Final EA. Based on that information, I find the proposed federal action is consistent with existing national environmental policies and objectives of NEPA's Section 101(a). I also find the proposed federal action wouldn't significantly affect the quality of the human environment or include any condition requiring any consultation per NEPA's Section 102(2)(C). As a result, the FAA will not prepare an Environmental Impact Statement for this action.

APPROVED:

MICHAEL N
WILLIAMS

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Mike N. Williams
Manager
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Date

DISAPPROVED:

Mike N. Williams
Manager
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Date