Neighborhood Stabilization Program 3

Environmental Assessment of Identified
Target Area for HUD Grant B-11-UN-32-0002

As part of the United States Department of Housing and Urban Development criteria for the acquisition and rehabilitation of property, an environmental review of the grant target area and individual properties is required. This review is a comprehensive analysis of the environmental concerns of the target area and complies with 24 C.F.R. Part 58.





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Project Description

Washoe County was competitively awarded a United States Department of Housing and Urban Development (HUD) Neighborhood Stabilization Program (NSP3) grant in the amount of \$1,735,918.00. The NSP3 program was authorized under the Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) of 2010. The NSP3 program was established for the purpose of stabilizing property values and arresting the physical decline of communities that have suffered from foreclosures and abandonment in local housing markets. The NSP3 program targets these properties for acquisition and rehabilitation. These housing units will then be used to provide housing opportunities for individuals and families who are at 50% or below of the Average Medium Income (AMI) for Nevada. The intent of this program is to purchase a minimum of 9 housing units in the program target area. The State of Nevada has received \$5,000,000.00 in NSP3 funds, and has dedicated \$400,000.00 of those funds to supplement Washoe County's NSP3 program.

The target area for this NSP3 grant is roughly bounded by Interstate 80 to the South, McCarran Boulevard to the North, Sutro Street to the West and El Rancho Street to the East. The housing stock is mixed in age, but the majority of properties were built between 1940 and 1980.

As part of the process to receive funding from HUD, an environmental review is required of the target zone to make sure that the entire target area, as well as each identified property are reviewed for environmental issues per 24 C.F.R. Part 58. Once the issues in the target area are identified, housing units will be purchased and rehabilitated.

Once these properties are acquired, they will be upgraded using the best practices for environmental reconditioning, local building codes and energy efficiency. In general, the housing stock will be rehabilitated, with little or no impact to the original house footprint. In some selected instances, housing may be razed and rebuilt if there is a clear advantage based on lot size or zoning options. Regardless of whether the housing is to be rehabilitated or rebuilt, attention will be paid to maintaining the original style of the neighborhoods.

Once the units are ready for occupancy, the Washoe County Department of Social Services (WCDSS) will identify clients, primarily disadvantaged families in the child welfare system, and rent the units to the identified clients. Washoe County will retain title to the properties and rents will be affordable using the Home investment Partnerships (HOME) established rents in conjunction with 24 CFR Subtitle A 92.252.

Contact Information

This NSP3 program was granted to Washoe County, a political subdivision of the State of Nevada. It is being administered through the Washoe County Department of Community Development, Washoe County Department of Social Services and Washoe County Public Works Department. The primary point of contact for concerns related to the environmental review should be directed to:

Stephen Shipman, MPA
Washoe County Department of Social Services
P.O. Box 11130
Reno, NV 89520
(775)785-5654
sjshipman@washoecounty.us

or;

Eric Young, Ph.D
Washoe County Community Development
P.O. Box 11130
Reno, NV 89520
(775) 328-3613
eyoung@wahoecounty.us

Target Area

As previously stated, the target area for this NSP3 grant is roughly bounded by Interstate 80 to the South, McCarran Boulevard to the North, Sutro Street to the West and El Rancho Street to the East. This area was chosen based on a review of the foreclosure activity in the area as well as a review of the area's income demographics. The review showed that the area was consistent with HUD expectations.

The latitude and longitude of the corner points of the project are:

- -119.798698 39.536814
- -119.798613 39.556339
- -119.778957 39.557067
- -119.775867 39.545419
- -119.775352 39.536153

A Geographical Information System (GIS) map is attached as Exhibit 1 for review.

General Environmental Concerns

The area selected for this program is built up residential and light commercial properties. In general, the most obvious and pressing concerns in regard to the physical properties and remediation will be:

- Existing or abandoned underground oil tanks
- Asbestos siding and insulation

- Lead pipes
- Historic housing
- Lead-based paint

In regard to the general area, the biggest concerns will be:

- Soil contamination based on abandoned gas stations or other underground storage tanks (UST)
- Soil contamination based on old dry cleaning facilities
- Existing light industrial facilities
- Impact upon the character of the area.

While it is expected that there will be some property specific hazardous mitigation, the area itself does not have many concerns as it is a mature residential area.

Results of Environmental Assessment

Coastal Management Zone

The Federal Emergency Management Agency (FEMA) states, "Generally, the coastal zone includes all territorial U.S. waters and adjacent land areas. The coastal zone includes beaches, islands, salt marshes, and wetlands, and some adjacent inlands. Each state designates the area of land and water resources that are included in their coastal zone and is regulated by a state coastal zone management program. If your project is in a state with a coastline (on the Atlantic Ocean, Pacific Ocean, Gulf of Mexico, or Great Lakes), you will need to consider the CZMA, and consult with your state coastal zone management program to determine if your project is in the coastal zone." (http://www.fema.gov/plan/ehp/elearning/f1.shtm)

The State of Nevada is landlocked, and is not contiguous with any of the listed bodies of water, and therefore is not in a Coastal Management Zone.

Coastal Barrier Resources

In review of the Federal Emergency Management Agency designation of States with Coastal Barrier Resources, Nevada is not listed as an affected state and therefore the target area is not in a CBRS designated community (http://www.fema.gov/business/nfip/cbrs/cbrs.shtm).

Floodplain Management

The Washoe County Department of Public Works reviewed the target area for floodplain management issues, and provided documentation that the area is not in a floodplain. Per Leo R. Vesely, P.E., CFM, "Please be advised that our interpretation of FEMA's Flood Insurance Rate Map (FIRM) indicates that the above referenced area is located within unshaded Zone X. Unshaded Zone X is defined by FEMA as an area outside of both the 100 year and 500 year storm flood events. The above zone is shown on FEMA Flood Insurance Rate Map Number

32031C 3045G, with an effective date of March 16, 2009." Letter attached and listed as Exhibit 2

Therefore, there are no adverse affects based on Floodplain Management, Executive Order 11988.

Historic Preservation

Due to the varied nature of the age of the structures in the target zone, as well as the number of units that will be acquired, each structure will be evaluated on a case by case basis for any historical or archeologically significant issues. A memorandum of understanding (MOU) has been executed with the Nevada State Historic Preservation office. This memorandum is specific to the process for evaluating individual properties, and will spell out the expectations for the provision of information and cooperation between the agencies in order to be in compliance with Section 106.

The Historic Reno Preservation Society has been contacted and will be provided a listing of identified properties and allowed to comment on any significant historical issues. These concerns will be taken into consideration.

Noise Abatement

The initial review of the target area identified three possible noise issues that could affect housing per HUD definitions. They are the Reno-Tahoe International Airport, the Southern Pacific Railway line located in downtown Reno South of the target area, and Interstate 80 which is the Southern Boundary for target area. Please see attached Exhibit 3.

The 2010 noise contour map of the Reno-Tahoe International Airport shows the closest noise zone (65 dB) is to the East of the target zone. The properties in the target area are not affected by the airport noise and do not require any mitigation as part of their rehabilitation. This contour map is Exhibit 4 and can be viewed at:

http://renoairport.com/sites/default/files/PDFs/NoiseEnvrionment/Exhibit4ee.pdf

For more information on the Reno-Tahoe International Airport current noise exposure, please review:

http://renoairport.com/sites/default/files/PDFs/NoiseEnvrionment/Chapter4.pdf

At its closest, the target area is within approximately 400' of a railway line. This line was recently reconstructed and dropped into a trench. Project ReTrac, executed by the City of Reno, was designed to eliminate the train traffic through the downtown corridor. As part of this project, an environmental impact statement (EIS) was completed. In review of the existing documents, the ReTrac project reduced the noise generated by trains approximately 15 dB's from pre-ReTrac levels. According to the EIS, the target area will not be subject to 65 dB or

greater due to the proximity to the railway. Due to the size of the documents, these will be placed on the NSP3 website for review.

The Southern boundary of the target zone abuts Interstate 80. The Nevada Department of Transportation (NDOT) is reconstructing the section of the Interstate from El Rancho Street to Sutro Street and has adequate noise mitigation (sound walls) measures in place, per an email from John Greene, PLS from NDOT. Please see Exhibit 5.

Properties purchased and rehabilitated in this target area do not appear to be subject to any special concerns due to noise.

Hazardous Operations

The primary concern in regard to hazardous operations in the target area is above ground propane storage tanks. These are scattered throughout the target area. Washoe County Department of Technology Services maintains a Geographic Information System overlay of all existing hazardous tanks in the target zone. Please see Exhibit 6. This map is used by emergency services, such as the fire and police, to locate potentially dangerous materials, or hazmat generators, in an emergency situation.

As these tanks are scattered throughout the target area, each individual housing unit selected for acquisition and rehabilitation will be reviewed for potential hazards. If a property is identified that is close enough to one of these hazards, steps will be taken to either mitigate the danger via installed obstructions or the property acquisition process will be halted.

<u>Airport Hazards</u>

The Reno-Tahoe Airport Authority was contacted and provided the target zone and a list of possible properties currently available. Lissa K. Butterfield, airport planner, responded that the target properties were not, "located within the Runway Clear Zone or Runway Protection Zone of the Reno-Tahoe International Airport. In addition, none of the properties below are within the military Clear Zone, Accident Protection Zone or Approach Protection Zone." As housing is identified, the Reno-Tahoe Airport Authority will be contacted to individually clear properties.

Protection of Wetlands

In review of the United States Fish and Wildlife Service National Wetlands Inventory mapper, the project area does not have any designated wetlands. The only wetland area is Teglia's Paradise Park which is located South of Oddie Boulevard and is maintained by the City of Sparks.

Therefore, there are no adverse affects based on the Protection of Wetlands, Executive Order 11990.

Toxic Chemicals and Radioactive Materials

In review of the United States Environmental Protection Agency's hazardous waste sites, four brownfields were identified in the target area. A brownfield is defined by the EPA as, "...real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant." (http://www.epa.gov/brownfields/overview/glossary.htm)

Three of the four sites were located at the far Southeast corner of the target zone, next to I-80. The other property is located on Oddie Boulevard to the North across from Teglia's Paradise Park in Sparks towards the East side of the target zone.

The four properties are listed on the brownfield mapper but have not been remediated. Any property purchase in or around this area would require soil sampling and possible remediation, and careful consideration would have to be made as to whether to purchase a house relatively near to any of these sites.

RESIDENTIAL AND COMMERCIAL PROPERTY-1	2450 - 2458 PRATER WAY	SPARKS	NV	89431	WASHOE	<u>Brownfields</u>	Map lt
RESIDENTIAL AND COMMERCIAL PROPERTY-2	2430 - 2444 PRATER WAY	SPARKS	NV	89431	WASHOE	<u>Brownfields</u>	Map It
RESIDENTIAL AND COMMERCIAL PROPERTY-3	2458 - 2462 PRATER WAY	SPARKS	NV	89431	WASHOE	<u>Brownfields</u>	Map <u>It</u>
VACANT LAND	2400 ODDIE BOULEVARD	SPARKS	NV	89431	WASHOE	<u>Brownfields</u>	Map <u>It</u>

There were no identified radiological or superfund sites in the target area, per the EPA community mapper, though there were several waste sites for the light industrial facilities around Teglia Paradise Park. For review of areas of concern please go to: http://www.epa.gov/emefdata/em4ef.home. Any housing identified for possible acquisition will be compared against existing EPA site issues, and an analysis of possible impact will be completed on a case by case basis.

The Washoe County District Health Department has reviewed the original target property list, and has identified the known issues at each unit and in the area directly concurrent with it. As acquisition options are identified, the WCDHD will provide property specific feedback to help identify any known hazardous conditions on a per property basis. Please see exhibit 9.

Air Toxics

The Air Quality Management Division (AQMD) of the Washoe County District Health Department reviewed the target area for air toxics which might pose a threat to residents of this area. Per Kevin Dick, Director, "AQMD did not identify any sources of air toxics that would pose any health threats to residences in this area. This area is also currently attaining the National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. Therefore, AQMD is not aware of any air quality concerns in this area that would affect the HUD project." Please refer to Exhibit 7.

Therefore the target area is in compliance with the Clean Air Act, as amended.

Wild and Scenic Rivers

The target area does not have any wild or scenic rivers going through the target area based on the National Park Service National Wild and Scenic River listing. The some parts of the lower boundary of the target zone is within one mile of the Truckee River, but as the Truckee River is not listed as a Wild or Scenic River, no Federal clearance is required. Therefore, the target area is in compliance with the Wild and Scenic Rivers Act of 1968.

This information was obtained at: http://www.rivers.gov/wildriverslist.html

Endangered Species

In a review of the target area by the Nevada Natural Heritage Program, four 'at risk taxa' were identified:

<u>Scientific Name</u> <u>Common Name</u>

Plant—Mimulus ovatus Steamboat monkeyflower

Invertebrates—Euphydryas editha monoensis Mono checkerspot

Mammals—Euderma maculatum Spotted bat

Birds—Agelaius tricolor Tricolored blackbird

This review also identified two Nevada Bureau of Land Management sensitive species:

Scientific Name Common Name

Plant – Eriogonum robustum Altered andesite buckwheat

Reptiles—Actinemys marmorata marmorata Northwestern pond turtle

As part of the individual property acquisition process, each housing unit will have an inspection by a biologist from the Washoe County Department of Parks and Recreation. This inspection will be to ascertain if there are any of the identified 'at risk tax' on the property.

In the event of identification of one of the six identified concerns on a target property, a consultation will be held with the Nevada Natural Heritage Program to determine appropriate next steps.

There are no known 'endangered species' specific to the target area, and therefore the target area is in compliance with the Endangered Species Act of 1973. Please see exhibit 8.

Sole Source Aquifers

Jamelya Curtis, a representative from Region IX of the United States Environmental Protection Agency (EPA) was contacted in regard to this project cleared it after reviewing the latitude and longitude of the target area stating,

"Under provisions to the Safe Drinking Water Act (SDWA), Section 1424(e), EPA is responsible for the review of projects that receive federal funding and are located in recharge areas that have received a Sole Source Aquifer Designation. Based on the information you have provided, the proposed NSP3 project is not within map limits of a designated sole source aquifer, and thus is not subject to review under SDWA Section 1424(e)." (Email dated 12/12/2011) Please see exhibit 10.

Region IX, which includes all of Nevada, does not have any identified sole source aquifers.

Farmlands Protection

The scope of the NSP3 grant is for the acquisition and rehabilitation of existing housing stock in a currently developed neighborhood. There is no existing farmland either contiguous to the target location, nor any farmland inside of the target area. Therefore the target area is in compliance with the Farmland Protection Policy Act of 1981.

Flood Insurance

Based on the determination from the Washoe County Public Works Department, none of the properties in the target zone should be required to carry flood insurance. The properties in the target area are not in a floodplain, per FEMA's Flood Insurance Rate Map. (Letter from Washoe County Public Works dated 12/22/2011)

Environmental Justice

In review of the target area, it does not appear that work conducted in this area would have a disproportionate impact on the residents of the area, or of clients who would be placed in these homes. The housing units selected will be scattered throughout the various neighborhoods. There are no chemical plants, railroad spurs, cattle feed lots and the area is not near the Reno-Tahoe International Airport.

It is the case that many of the housing units, due to their age and condition, may have lead paint, lead pipes, soil contamination or asbestos siding/insulation. As part of the selection process, these concerns will be taken into consideration.

Once the selection of the properties for acquisition has been completed, each structure will have an individual environmental assessment to determine the required level of mitigation to bring the structure up to HUD and building code standards.

The mitigation for these concerns has been integrated into the cost structure of the grant.

Therefore, there are no adverse affects based on Environmental Justice, Executive Order 12898.

Environmental Summary

Overall, there were very few identified issues in the target area. The most pressing concern for this program, based on NSP3 timelines for the acquisition and rehabilitation of identified properties is maintaining compliance with Section 106 guidelines on historic preservation. Many of the houses that may be acquired were built prior to 1962, which requires a comprehensive review in conjunction with the State Historic Preservation Office. This review has multiple administrative steps to determine if the house qualifies for candidacy to register as a historic building. As this determination involves research, it could create delays which could impact the ability of the program to maintain HUD deadlines.

In consultation with the State Historic Preservation Office (SHPO), it was recommended that a Memorandum of Understanding (MOU) between Washoe County and SHPO be created. This would streamline the identification and acquisition process on properties by clearly articulating each agency's responsibility. This MOU is similar to a current City of Reno MOU which has been in place since 2006.

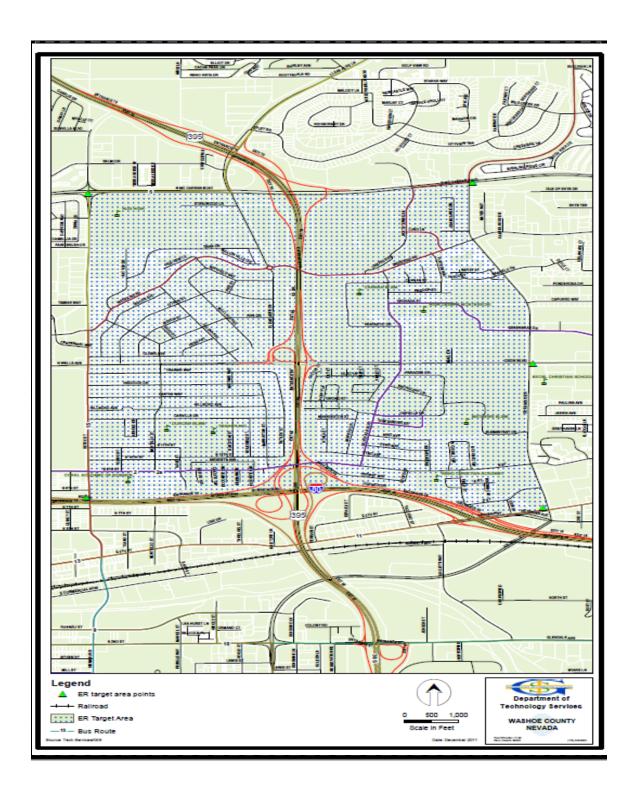
There were multiple sites in the target area that were identified as having waste or brownfield issues. It is understood that each housing unit in the process of acquisition will be compared against the known concerns and a case by case evaluation will be conducted to determine if mitigation is appropriate. If the concerns cannot reasonably be addressed, then the property will not be acquired.

Based on the program activities in this grant, this project falls under **Categorically Excluded & Subject To (CEST) 24 C.F.R. part 58.5.** This environmental review is evidence of the findings of **no 58.5 issues** in regard to the target area. This document is being submitted to satisfy HUD 24 C.F.R. part 58 requirements and to provide an Environmental Review Record (ERR) for NSP3 grant B-11-UN-32-0002.

This document will be published for community feedback for no less than 15 days and is subject to approval by the United States Department of Housing and Urban Development.

Submitted by:		
Katy Simon, County Manager Washoe County	Name	Date
Stephen Shipman, Grants Coordinator Washoe County Social Services	Name	Date
Eric Young, Senior Planner Community Development	Name	Date —————

Exhibit 1







Department of Public Works

"Dedicated to Excellence in Public Service"

1001 East 9th Street PO Box 11130 Reno, Nevada 89520 Telephone: (775) 328-2040 Fax: (775) 328-3699

December 22, 2011

Stephen Shipman Washoe County Department of Social Services P.O. Box 11130 Reno, NV 89520

Re:

Environmental Review for Neighborhood Stabilization Plan 3 (NSP3) Latitude and Longitude of corner points: -119.798698 39.536814, -119.798613 39.556339, -119.775867 39.545419. -119.775352 39.536153

Mr. Shipman,

Please be advised that our interpretation of FEMA's Flood Insurance Rate Map (FIRM) indicates that the above referenced area is located within unshaded Zone X. Unshaded Zone X is defined by FEMA as an area outside of both the 100 year and 500 year storm flood events.

The above zone is shown on FEMA Flood Insurance Rate Map Number 32031C 3045G, with an effective date of March 16, 2009.

If you have any further questions, please do not hesitate to contact this office.

Sincerely,

Kimble O. Corbridge, P.E., CFM Acting County Engineer

Leo R. Vesely, P.E., CFM

Licensed Engineer

LRV/lv

Exhibit 3

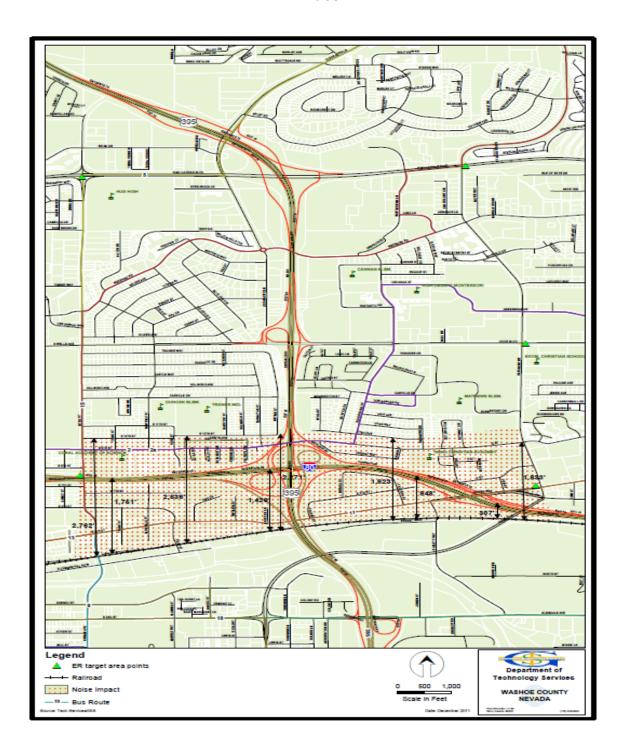
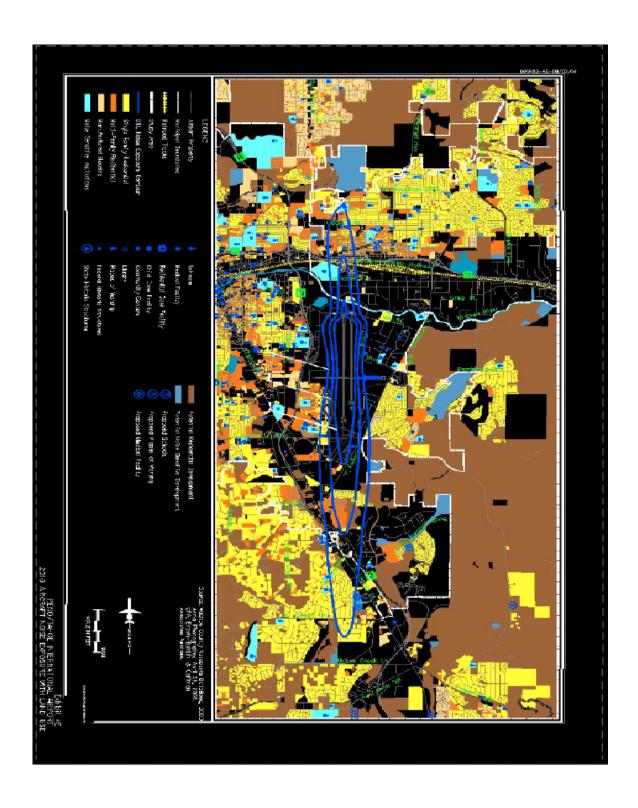


Exhibit 4



Shipman, Stephen J

From: Sent:

Greene, John H [jgreene@dot.state.nv.us] Thursday, January 26, 2012 12:52 PM Shipman, Stephen J

To:

Subject:

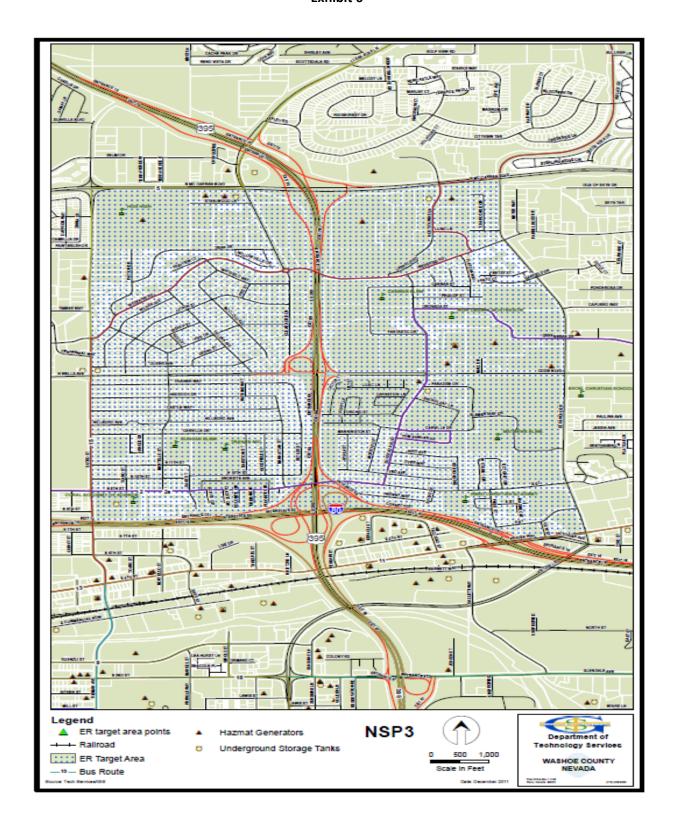
Re: Traffic Noise Studies along I-80 between Sutro St. and El Rancho Dr.

Re: Traffic Noise Studies along I-80 between Sutro St. and El Rancho Dr.

This is in response to your recent inquiry about Traffic Noise Studies along I-80. There are existing noise barriers within the area mentioned above that were constructed as part of Contract 3090 which was the I-80/US 395 Reno Spaghetti Bowl capacity improvement project that was awarded July 1, 2002 and completed September 29, 2006. Prior to the finalization of the construction plans a Traffic Noise Model(TNM) was performed using design year worst case traffic volumes and it was determined that several residential areas met the Noise Abatement Criteria(NAC) for NDOT to include traffic noise mitigation as part of the project. Design year is defined as 20 years in the future from the date the project is completed and opened to the public. NAC is a traffic noise measurement guideline defined as "approaching or exceeding 67 dB(A)" for the residential areas. Currently NDOT does not have any capacity projects planned in the near future in the area of your concern that would add additional noise barriers. Call or email If you have any further auestions.

John Greene, PLS **Traffic Noise Section Environmental Services Division** Nevada Dept. of Transportation 1263 S. Stewart Street Carson City, Nevada 89712 775-888-7691 Office 775-722-6529 Cell

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WASHOE COUNTY HEALTH DISTRICT AIR QUALITY MANAGEMENT DIVISION



January 3, 2012

To: Stephen Shipman

Washoe County Department of Social Services

350 S. Center Street Reno, NV 89501

From: Kevin Dick, Director

Air Quality Management Division Washoe County Health District

P.O. Box 11130 Reno, NV 89520

Subject: Environmental Review for Neighborhood Stabilization Plan 3 (NSP3)

The Air Quality Management Division (AQMD) has reviewed the areas that you identified in your correspondence of December 23, 2011. You requested an environmental review of an area for which the general boundaries are McCarran Boulevard to the North, Sutro Street to the West, El Rancho Street to the East and I-80 to the South.

AQMD did not identify any sources of air toxics that would pose any health threats to residences in this area. This area is also currently attaining the National Ambient Air Quality Standards (NAAQS) for criteria air pollutants.

Therefore, AQMD is not aware of any air quality concerns in this area that would affect the HUD project. The overall air quality meets attainment of NAAQS and there are no air toxics sources in this area that pose any concerns.

Sincerely,

Kevin Dick Director

P.O. BOX 11130 Reno, NV 89520-0027 • (775) 784-7200 • FAX (775) 784-7225

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L'EO DROZDOFF Director

Department of Conservation and Natural Resources

JENNIFER E. NEWMARK





Nevada Natural Heritage Program Richard H. Bryan Building 901 S. Stewart Street, suite 5002 Carson City, Nevada 89701-5245

> tel: (775) 684-2900 fax: (775) 684-2909



STATE OF NEVADA DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Nevada Natural Heritage Program

http://heritage.nv.gov

03 January 2012

Stephen Shipman Washoe County Department of Social Services P.O. Box 11130 Reno, NV 89520

RE: Data request received 12 December 2011

Dear Mr. Shipman:

We are pleased to provide the information you requested on endangered, threatened, candidate, and/or At Risk plant and animal taxa recorded within or near the Neighborhood Stabilization Program 3 (NSP3) Area Project area in Washoe County. We searched our database and maps for the following, a two kilometer radius around:

Township 19N	Range 19E	Section 01
Township 19N	Range 20E	Section 06
Township 20N	Range 19E	Section 36
Township 20N	Range 20E	Section 31

The enclosed printout lists the taxa recorded within the given area. Please be aware that habitat may also be available for, the altered andesite buckwheat, *Eriogonum robustum*, a Nevada Bureau of Land Management Sensitive Species, and the northwestern pond turtle, *Actinemys marmorata marmorata*, a U.S. Forest Service (Region 5) sensitive species. The Nevada Department of Wildlife (NDOW) manages, protects, and restores Nevada's wildlife resources and associated habitat. Please contact Chet Van Dellen, NDOW GIS Coordinator (775.688.1565) to obtain further information regarding wildlife resources within and near your area of interest. Removal or destruction of state protected flora species (NAC 527.010) requires a special permit from Nevada Division of Forestry (NRS 527.270).

Please note that our data are dependent on the research and observations of many individuals and organizations, and in most cases are not the result of comprehensive or site-specific field surveys. Natural Heritage reports should never be regarded as final statements on the taxa or areas being considered, nor should they be substituted for on-site surveys required for environmental assessments.

Thank you for checking with our program. Please contact us for additional information or further assistance.

Sincerely,

Eric S. Miskow Biologist /Data Manager

At Risk Taxa Recorded Near the NSP3 Project Area

Compiled by the Nevada Natural Heritage Program for Washoe County Department of Social Services 29 December 2011



Washoe County Health District



ENVIRONMENTAL HEALTH SERVICES DIVISION

January 3, 2012

Stephen Shipman, MPA Grants Coordinator Washoe County Department of Social Services PO Box 11130 Reno, NV 89520-0027

RE: Environmental Review for Neighborhood Stabilizations Plan (NSP3)

Dear Mr. Shipman:

This agency received a request for an environmental records review of several properties related to the referenced project. The review has been completed and the following are our findings:

- There are no records of regulated Underground Storage Tank (UST) systems at any of the
 referenced addresses. There are also no records of heating oil tank releases or abandonments
 at any of the locations. There was a corrective action case at 2570 D Street (NRUST #265);
 this case file was transferred to the Nevada Division of Environmental Protection (NDEP)
 several years ago. For further information, it is recommended that you contact the Corrective
 Action Bureau for that agency.
- There are no records of any hazardous materials or waste spills at any of the locations. There
 was one clandestine drug lab complaint at 2150 Sutro Street, Unit #C4. The case number for
 this is CM07000065. A copy of the activities related to this case is attached.
- 3. No other environmental issues were identified during our records review.

Please let me know if you have any other questions related to this project.

Sincerely,

Robert O. Sack Division Director

