

As per page 28 of The Washoe County Planning Commission Staff Report, the Callahan Neighbors Community Group is submitting this Appeal to the findings for conditional approval of the Ascenté Tentative Subdivision Map Case Number: TM16-009 and Special Use Permit: SW16-003. Our challenges to the Special Use Permit Findings (WCC Section 110.810.30) as listed on Page 25 of the Staff Report, are detailed in the sections below.

Challenge to Finding a) PLAN CONSISTENCY

1. Viewsheds

- a. **Violates Mt Rose Scenic Byway Corridor Management Plan: Goals and Objectives, Goal 4 (page 6): Protect cultural resources and views from growth and development. Strategies and Action Items (page 59) “Preserve Views and Scenic Vistas/Protect Viewsheds -** Manage development and grading to preserve mountain views and avoid mass grading and large rock cuts visible from the highway.”
- b. **Letter from Washoe County Parks planner (Dennis Troy) dated May 8, 2017 Conditions 1. Preserve Views and Scenic vistas/Protect Viewsheds -** This letter lists eight Guidelines for Grading and Rock Cuts.
- c. **Forest Area Plan (FAP) F2.17.f -** “Development WILL be compatible with and enhance the scenic quality of the Mt. Rose Highway corridor”.
- d. **FAP F.2.18.c -** “The development shall incorporate a view shed plan that will direct the location and intensity of development within the overlay district. Infrastructure that impacts the view shed of adjacent properties SHALL be designed such that the impact to the view shed are mitigated.”
- e. **FAP F.2.3 -** “Applicants REQUIRED to present their items to the CAB must submit a statement to staff regarding how the final proposal responds to the community input received from the CAB.”
- f. **FAP F3.5.g. -** “The view of the property, particularly the view shed from SR 431 SHALL be designed such that site designs, architectural style, lighting, roadways, infrastructure, landscaping and signage blend with natural features of the land and create a sense of place that is scenic, compatible with local environment, and establishes a safe and welcoming neighborhood atmosphere.”

Application: Based on the above regulatory requirements, the Tioga and Whitney Villages and the connecting road create a negative impact to the Mount Rose Corridor and surrounding

area's Viewshed, and is damaging to the face of the steamboat hills, as protected in the **Scenic Byway and FAP**.

Conclusion- Both Ascent's response to the community and to the Forest Area Plan is inadequate to satisfy the requirements laid out above. The developer did not address these issues in their response letter dated May 15, 2017 as required by **FAP F.2.3**. Tentative map approval should be denied.

2. Wetlands

- a. **FAP F.20.3** - "Development proposals that impact any area designated "potential wetlands" on the Development and Suitability map must conduct a wetlands delineation study and obtain Army Corps of Engineers certification of proposed wetlands".
- b. **WCP Section 110.432.35 (c) Development Standards** - The following standards are intended to protect, maintain, enhance and restore sensitive fauna and flora habitat: **(b4) Delineation of all wetlands, streams and water bodies.**

Application: There are potential wetlands, as designated by the development suitability map in the **FAP**, in the Tioga village section of the development. The tentative map application does not address this issue.

Conclusion: The tentative map does not meet minimum requirements based on these code violations of both the **FAP** and **WCP**. Recommend denial of tentative map.

2. Groundwater Recharge

- a. **FAP F2.18i** "Ground water recharge areas shall be incorporated into the site planning and enhanced whenever possible. Low Impact Development (LID) standards shall be utilized to enhance groundwater recharge and manage storm water runoff."

Application: The Forest Area Plan clearly states that groundwater recharge areas shall be incorporated into development in the Madera Ridge Mixed-use Overlay District (MRMUOD). This tentative map does not address groundwater recharge. Furthermore, the areas that now contribute to groundwater recharge will be covered with high-density housing and impermeable surfaces such as roads and sidewalks. Although Ascenté mentions this requirement in their plan, they have no elements of Low Impact Design or groundwater recharge areas in their plan.

Conclusion: Due to lack of incorporating Low Impact Design or groundwater recharge in their plan the tentative map should be denied.

Challenge to Finding b) DESIGN AND IMPROVEMENT

1. Buffering and Landscape design.

- a. **FAP F.2.18.e-** “Primary structures SHALL be buffered from adjacent residential areas outside the MRMUOD in a manner that preserves the suburban/rural character of the existing developments. Buffering can include but is not limited to; areas of open space, clustering or otherwise locating behind ridges or outcroppings, and significant landscaping.”

Application: Ascenté’s proposed buffer of 20 to 40 feet isn’t significant enough to match the rural character and LDS zoning of the surrounding neighborhoods. At the time **MRMUOD** was approved, the **Washoe County Management Plan** required a 200-foot buffer or lot matching. Lot matching has expired, but the proposed buffer is not large enough to separate LDS zoning from MDS zoning to maintain the rural character. Additionally, landscaping for buffer zones is now the responsibility of the HOA and will not be implemented until buildout is complete and formation of an HOA is accomplished. This will put off any landscape buffering for as much as 2 to 3 years after site construction concludes.

Conclusions: The current buffering proposals are inadequate to maintain the character statement of the FAP. Because of inadequate buffering and delayed implementation of landscaping requirements we recommend denial of the tentative subdivision map.

3. Parks and Trailhead Parking.

The Tentative Map does not include trailhead parking. There must be a place for visitors to the Ascenté property to park at trailheads. Also, the lack of a seven-acre public park located on proposed property demonstrates Ascenté’s failure to meet FAP requirements listed below.

- a. **FAP F.10.4** – “Parking WILL be provided at all trailheads unless technical or safety issues prevent the construction of parking facilities”.
- b. **FAP F.10.7** - “Development proposals and population trends will be evaluated on their impact to established community standard of seven acres of Neighborhood/Community Park per 1,000 residents. When warranted the Washoe County Department of Regional Parks and Open Spaces will request the dedication of an appropriate amount of community park acreage as property develops within the planning area.”

- c. **FAP F.2.18.i** - “The development plan **MUST** include a civic use component such as but not limited to public art, recreation, or assembly.”
- d. **FAP F.2.3** - “Applicants required to present their items to the Citizen Advisory Board (CAB) must submit a statement to staff regarding how the final proposal responds to the community input received from the CAB.”

Application- Ascenté has plans for more than 600 homes in the immediate area of this tentative map approval and has yet to address trailhead parking or a community park. These issues have been presented at each of the CAB meetings where the Ascenté proposal was presented. To date they have yet to address this issue.

Conclusion- The developer has not met these requirements and did not respond to resident comments in the CAB response letter as required by **FAP F.2.3**. The tentative map does not meet minimum requirements as laid out by these codes and as such cannot be approved.

3. Character of Neighborhood.

- a. The Character Statement of the **FAP** states that **the rural quality of life is to be protected**. There are many reasons why each current resident chose to live in this area, but the biggest reason for all is the rural character of our neighborhood.
- b. **LUT 21.d** - “Issuance not detrimental – Issuance of a permit **WILL** not be significantly detrimental to the public health, safety, or welfare; injurious to property or improvements of adjacent properties; or detrimental to the character of the surrounding area”.
- c. **FAP F.2.17.h** - “Development **WILL** contribute to the community character, promote neighborhoods, and create a sense of place founded in the quality of life that comes with environmental and community responsibility.”
- d. **FAP F.2.10** - “The impact of development on adjacent land will be mitigated. The appropriate form of mitigation may include but **WILL** not be limited to open space buffering, or parcel matching and should be determined through a process of community consultation and cooperation. Applicants **SHALL** be prepared to demonstrate how the project conforms to this policy.”
- e. **FAP F.2.13** - “The approval of all special use permits and administrative permits must include a finding that the community character as described in the Character Statement can be adequately conserved through mitigation of any identified potential negative impacts.”
- f. **LUT.3.4.4** - “Identify and assist in revitalizing mature neighborhoods to ensure their long-term stability.”

Application: These excerpts from the **FAP** and the **LUT** all refer to the community character of our current communities. The developer’s current plan does not satisfy these requirements because it does not fit the rural character of our area in terms of density, traffic and safety. Washoe County has spent years developing the **FAP, LUT**, and the **Scenic Byway** plans to insure communities within the **Forest Area** will be preserved.

Conclusion: The current rural character will be vastly diminished with the addition of these subdivisions. The **FAP, Scenic Byway**, and **LUT** intentions, direction, and stipulations must be followed by any new proposal. Ascenté’s current proposal does not meet these requirements. We, the current residents, request that the tentative map approval be denied.

4. Management of Storm Water Runoff.

Ascenté’s storm water modeling work was not adequate to characterize current and predictive storm water conditions and events, both pre-and post-development and if not corrected, would subject the Callahan neighborhood to increased flood risk due to undersized flood mitigation structures.

a. FAP F.16.3 - “Washoe County will work to ensure that the action of one property owner does not adversely impact the properties and rights of another property owner, as measured by increased flood peaks, flood stage, flood velocity erosion, and sedimentation.”

b. FAP F.19.3 – “Unless utilized as a component of an overall storm water runoff system that seeks to enhance recharge and promote Low Impact Development standards, the use of curb and gutter will be minimized. The use of roadside ditches is encouraged for the purpose of augmenting groundwater recharge.”

c. FAP F.2.18.(I) – “Groundwater recharge areas shall be incorporated into the site planning and enhanced whenever possible. Low impact Development (LID) standards shall be utilized to enhance groundwater recharge and manage storm water runoff”.

Application: Estimated runoff from Ascenté’s HEC-HMS model greatly under-predicts actual measured values for runoff from their property under existing conditions. Effectively this allows the applicant to discharge more storm water for a given storm than currently occurs. Existing infrastructure is insufficient to handle additional runoff from the Ascenté project. Although they addressed this issue in their proposal to the planning commission, their current model still over-estimates runoff for existing conditions. For example, the area of the proposed Sierra Village has an estimate for a five-year recurrence interval storm that is four times higher than the measured value.

Conclusions: The tentative subdivision map should be rejected due to the inadequate Conceptual Drainage Report and under-sizing of detention basins.

Challenge to finding 4) AVAILABILITY OF SERVICES

1. Water Supply

Ascenté does not mention where it will obtain the estimated 22 million gallons of water needed for construction and dust suppression. Does Ascenté have a contract with TMWA for adequate supply to meet this water need?

2. Sewage Services

We understand that the Callamont Subdivision has been purchased and the new owners are revisiting their need for utilities. This development had planned to use the same sewer facilities that Ascenté is now saying they need. How will Washoe County provide additional services to both developments? The Planning Commission cannot ignore Callamont development needs while also promising County Infrastructure to Ascenté.

Challenge to finding 5) FISH AND WILDLIFE

1. Fish and Wildlife

a. FAP F.14.2 – “Any development that has the potential to negatively impact an established wildlife migration route or critical habitat, including but not limited to traditional mule deer migration routes, deer winter range, federally classified Threatened and Endangered species and the Pacific Flyway for migratory birds and their associated habitat must demonstrate how that project will protect the integrity of the migration route or habitat.”

b. WCDC 110.822.45 - Finding for Open Space Resource Constraints and Cooperative Planning Considerations Not Elsewhere Addressed

(a) Findings for Wildlife

(1) The proposed amendment provides a full and detailed assessment of wildlife habitats that have been identified in the Regional Open Space Plan. The amendment must be found to include preservation, enhancement and/or mitigation measures as necessary for the maintenance of habitat.

(2) The amendment demonstrates how it is not detrimental to the protection, preservation and enhancement of wildlife habit, as applicable.

c. **Letter from Mark Freese of the Nevada Department of Wildlife (NDOW) dated October 13, 2016. to Mr. Lloyd and Ms. Mullin.** “The steamboat hills, where the Ascenté development project is located contains intact, high quality sagebrush and bitterbrush communities that provide critical habitat for mule deer. Mule deer are species of conservation priority for NDOW as identified in Nevada’s wildlife action plan. Further they are key wildlife species in Washoe County Master Plan, and are a local species of importance for ecological and economic reasons.”

Application: Currently mule deer use the steamboat hills as wintering grounds. Mule deer utilize Ascenté’s property for migration to the winter grounds of the Steamboat Hills. Subdivision plans interrupt both migration routes and overwintering grounds. Ascenté’s plans will change mule deer migration routes and move mule deer wintering grounds.

Conclusions: Ascenté’s current proposal will have a detrimental effect on wildlife and winter survival. Approval will reduce wildlife's existence on the Steamboat Hills. This plan is not consistent with NDOW’s goals, Washoe Counties Master Plan, or Forest Area Plan. Based on these facts we recommend denial of the tentative map.

Challenge to finding 8) ACCESS

1. Traffic Impact on Safety of the current Residents

a. **FAP F.3.5.d** - “Ingress, egress, and internal circulation must be designed to improve overall traffic safety, improve access for affected adjacent property owners, consolidate and minimize access to SR 431 promote pedestrian and cycling activity, and mitigate any negative impact to existing development.”

Application: The Ascenté project will dramatically increase traffic in existing neighborhoods. The lack of new access roads from Mt. Rose does not improve access for adjacent property owners. Existing narrow roads are bounded by deep drainage ditches. Pedestrians, equestrians, and bicycle riders will be negatively impacted by substantial increased traffic in the existing neighborhoods. Although measures will be instigated to mitigate some issues on the Fawn Lane traffic route, no such provisions will be provided on Shawna Lane, Cherrywood Drive, Goldenrod Drive, Cedarwood Drive, Wildwood Drive, and Tannerwood Drive. Additionally, Callahan Ranch will be subject to additional traffic created by the already-approved Callamont 200 Home Subdivision, which MUST be taken into account when evaluating Ascenté’s current traffic plan.

Ascenté is relying solely upon the current Level Of Service (LOS) designation of the roads listed above as the determinative factor of whether their plan complies with the FAP requirements. If LOS were the determinative factor, there would have been no need for the

FAP to say "must be designed to improve overall traffic safety, improve access". The FAP would have simply said, roads must comply with the applicable LOS rating for each affected road. Since regulations must be read so as to make them not superfluous, the LOS is not the determinative factor.

Conclusions: Ascenté's current proposal will adversely affect the existing citizens and livestock by inadequately improving existing infrastructure. Rural character and safety will be diminished by substantially increasing traffic within the existing neighborhood. We recommend that the tentative subdivision map be denied based on safety issues.

2. Nevada Department of Transportation letter to Mr. Lloyd and Ms. Mullin dated October 20, 2016:

a. Recommendation from NDOT is as follows: "There is currently a traffic signal at the intersection of Mt Rose and Thomas Creek Road. There is no south approach leg. Is there a way the developer can construct a phase further east that would tie into Thomas Creek Road intersection instead of the proposed phase 1? This would be a beneficial improvement. Ascenté Development traffic would utilize the existing signal and have minimal impact on Callahan Road."

b. The following statements are from the staff report, they echo the need for access for the Ascenté project to come from the signalized intersection at Mount Rose Highway and Thomas Creek Rd.

"Report does not include full build-out of development. The traffic report shall be amended such that each phase shall include traffic mitigation strategies and recommendations."

"There Matera Ridge representatives further committed to build and dedicate to Washoe County the extension of Thomas Creek Parkway from the intersection at Mt. Rose to Matera Ridge across from the United States Forest Service property as the primary access road. The Ascenté applicants will adhere to this commitment with the second phase of this development which will be located along the other side of the ridge directly east of the proposed (first phase) of this development. All of the commitments and representations provided by the previous owners of the Ascenté property (Matera Ridge) were used as criteria to support the intensification of the property when the Forest Area Plan update was adopted."

As the former owner of the property is quoted as saying in the July 2009 Board of County Commissioners meeting, "Mr. Hempel said access to his property from a signalized intersection was a much preferred access then (sic) the Fawn Lane intersection".

Application: The full build-out plan is required to understand complete impact of the project and will affect the mitigations needed for traffic.

Conclusions: Recommend that the report be amended to include full build-out and mitigation strategies for each additional phase. No tentative map approval should proceed until full build-out is delineated with mitigation strategies. Furthermore, Phase 1 and Phase 2 currently will not be connected by road to allow Phase 1 traffic connectivity to the signalized intersection at Thomas Creek and SR 431, forcing all Phase 1 traffic through current inadequate infrastructure. Because traffic connectivity is so limited the tentative subdivision map should be denied.

In summary, there is no mitigation for traffic increases to be incurred in Phase 1, although Ascenté proposes that adding the connector road south from Thomas Creek Road, proposed in Phase 2 will provide mitigation to increases in traffic volumes to Shawna and Fawn Lanes. And who knows if Phase 2 will ever be built? What if it is not? Then there will be NO mitigation to additional traffic incurred by Phase 1. The County cannot count on Phase 2 to remediate traffic volume and safety concerns identified for Phase 1. It is not legal or just to let Callahan residents pay the safety price for this inconsiderate assumption.

Challenge to Finding 6) PUBLIC HEALTH

1. Fire Safety

a. TMFPD and Washoe County Wildland-Urban Interface Code Section 603 and Table 603.2 – “All lots abutting any wildland must have a 50ft setback (‘Fuel Modification Distance’) from that boundary interface with NO COMBUSTIBLES THEREIN including wooden fences.”

Application: Ascenté is in a ‘High Wildland Fire Hazard’ area (see <http://wcgisweb.washoecounty.us/FireHazard>).

Conclusion: The Ascenté Tentative Map Design does not incorporate adequate protection from high wildland fire hazards and will INCREASE potential for impact to human health and safety due to: 1) increased potential for fires to occur; 2) impediment to residents’ ability to escape fire; and 3) inability for County Fire Department to fight fires due to lack of adequate property access.

2. Potential for Lead Contamination

During the Planning Commission Meeting on June 6, 2017, Ascenté’s consultant, McGinley and Associates presented a rebuttal of our evaluation of their screening-level study conducted in August 2016. Mr. John Beach, former US EPA toxicologist offers the following discussion in rebuttal to their defense of their work:

“The RSL of 400 milligrams per kilogram (mg/kg) is no longer technically justifiable as a concentration of lead in soil that can be considered protective of public health.

My letter to the Washoe County Planning Commission dated May 10, 2017 included the following statement:

The RSL of 400 mg/kg for residential soil used is outdated and a downward revision is currently being actively considered. My recent personal communication with Dr. Patrick Wilson, a Senior Regional Toxicologist at US EPA Region 9, indicated that for the past 3 years, the regional toxicologists have been regularly using 80 mg/kg as the clean-up level for lead at contaminated sites with possible residential use that are being cleaned-up under US EPA's authority. This change reflects more recent information about the toxicity of lead and how exposure occurs.

I have asked Dr. Wilson to provide to me a statement confirming his use of 80 mg/kg as a soil clean-up level and he is currently preparing that statement. I will pass it along when I receive it.

By definition, policy necessarily lags science. You must know something before you can act on it. The EPA Regional Screening Level (RSL) of 400 milligrams per kilogram (mg/kg) for lead in residential soil is an example of that principle.

The 400 mg/kg value is based on the blood lead level of 10 micrograms per deciliter (ug/dl) then recommended by the Centers for Disease Control (CDC) as a blood lead level action level, i.e., when measured in a child's blood, public health officials should take action to protect that child. Subsequent advances in our understanding of the relationship between exposure to lead and brain damage in children now clearly show that 10 ug/dl is not protective. The attached undated CDC document states that the CDC has lowered their "blood lead level of concern" to 5 ug/dl (CDC 2017a). The CDC also states that no safe blood lead level in children has been identified and that experts now use a reference level of 5 micrograms per deciliter to identify children with blood lead levels that are much higher than most children's levels. The new CDC level is not based on a "no effect level", rather, it is based on the U.S. population of children ages 1-5 years who are in the highest 2.5% of children when tested for lead in their blood (CDC 2017b). Brain damage has been measured at levels as low as 2 ug/dl and levels lower than that are difficult to measure (EPA 2013). When 2 ug/dl is used as the target blood lead level instead of 10 ug/dl, the model that EPA used to develop the 400 mg/kg RSL, produces a soil concentration of 80 mg/kg.

Because of these advances in our understanding of the relationship between exposure to lead and adverse effects, USEPA is currently actively reviewing the considering the revision of the RSL for lead. As evidence of that, I have attached several documents currently being circulated and discussed among toxicologists and risk managers from EPA headquarters and regional offices. Note that these are internal EPA documents intended to provide a starting point for discussions among EPA headquarters and regional offices about what soil lead concentrations should be used as RSLs. They do not represent policy or regulation. Note also that RSLs are screening levels, intended to provide site managers and risk managers with a frame of reference when evaluating soil concentrations, and do not represent default clean-up levels.

CDC 2017a. Fact Sheet - Blood Lead Levels in Children. https://www.cdc.gov/nceh/lead/acclpp/lead_levels_in_children_fact_sheet.pdf Downloaded January 24, 2017.

CDC 2017b. CDC Web page - What Do Parents Need to Know to Protect Their Children? https://www.cdc.gov/nceh/lead/acclpp/blood_lead_levels.htm.

EPA 2013. Integrated Science Assessment for Lead. EPA/600/R-10/075F. National Center for Environmental Assessment-RTP Division, Office of Research and Development, U.S. Environmental Protection Agency. June.”

Conclusion: All neighborhoods in the vicinity of the Galena Hill Mine, including Ascenté, may be subject to soil lead contamination. We have demonstrated that the McGinley Study used to address that issue at Ascenté was a preliminary measure at best and does not adequately characterize area soils. Even so, the information it provides demonstrates that lead contamination is present at Ascenté, at levels that threaten public health. Moreover, it does not provide data adequate to provide the necessary assurance that the lead contamination on the Ascenté property does NOT present a threat to public health. Current US EPA, NV Department of Environmental Protection and NV Bureau of Mines, Division of Abandoned Mine Lands methods, tools and best practices for site characterization, lead toxicity, risk assessment and risk management should be employed to determine that hazardous levels of lead contamination are not present at Ascenté before development can proceed.

Tentative Map Additional Conditions for Approval

If the County Commissioners do not see fit to reject the tentative map based on the technical points provided above, we also provide requests for conditions of approval that will serve to mitigate the many impacts to our rural area.

Forest Area Plan F.2.9 - “Prior to their incorporation into the Development Code, the standards established in policies **F.2.1-F.2.16** will be implemented through tentative map conditions, improvement plans, CC&Rs, deed restrictions or other methods deemed as appropriate by the Director of Community Development. When appropriate, Washoe County staff shall establish the implementation measures as conditions of tentative map”.

1) Invalid Traffic Study

We are calling into question the validity of the Traffic Works traffic study due to the following:

The study does NOT include methodology used to determine the **location** of each traffic counter and the **time period** that each counter was operated. For instance, the traffic counter on Cherrywood Drive was installed near its intersection with Shawna Lane, and best represents traffic on Shawna Lane, not Cherrywood Drive. This counter cannot be used to represent traffic counts

on Cherrywood as it excludes approximately 60 homes that use Cherrywood Drive. The Tannerwood Dr. traffic-count of 514 cars is more representative of Cherrywood Dr. traffic. By improperly reporting numbers on Cherrywood, it potentially protects the developers from having to make mitigations if Cherrywood crosses over into collector status. This is disingenuous at the least, and certainly allows the developer to totally ignore impacts to current residential traffic and pedestrian safety.

Conclusion- A new traffic study, **when school is in session**, with **properly placed and identified traffic counters**, must be completed prior to tentative map approval. True traffic counts are necessary to determine whether Cherrywood Drive will indeed require additional mitigations if it is to be re-classified as a corridor.

2) Contentious Development. Tioga and Whitney Villages, and their connecting road create the most conflicts with the **FAP** and **WCP** as presented above. Removing those proposed subdivision elements would bring the project into better compliance with the **FAP**, **Scenic Byway** and the **WCDC** with regard to viewshed. Additionally, eliminating those proposed elements would allow the project to better meet **NDOW**'s recommendation that development stay within the "larger development matrix" and not push to the fringes, endangering an important mule deer habitat. Eliminating these proposed elements will also **greatly reduce traffic thus reducing traffic and fire hazards**.

3) Blasting requirements. Residents require a robust safety protocol for potential blasting and detailed mitigation for neighborhoods, wells, residents, and pets/livestock if rippability studies prove the need for blasting.

4) Covered Ditches and walkways/bridle paths for Shawna Lane, Cherrywood Drive, Goldenrod Drive, and Tannerwood Drive.

a. Precedence was set when Washoe County made the Estates at Mt. Rose and the Reynen and Bardis/Callamont projects provide safety walkways and covered ditches for Callahan Rd.

b. The amount of traffic increase generated on the mentioned roadways dictate the need for safety walk/bridle pathways to be constructed.

c. Unless these safety proposals are incorporated into the Tentative Map Approval Process the Developer will have imposed both a safety and character change to the existing neighborhood.

5) Wildfire Prevention and Firefighting. We request an easement for fire suppression equipment along the southern property line of the Ascenté project. This area is ideally suited for fire suppression for fires started along the freeway that approach both the Ascenté project as well as existing residents of Fawn Lane and Callahan Ranch.

6) Geotechnical Characterization - Oversight of Geotechnical Fault and Soil Studies. There is already a “Condition for Approval” for a complete and detailed fault study. The applicant’s proposal indicates that only one trench will be excavated to investigate potential faults. We are asking the County to require the developer to invite the Nevada Bureau of Mines and Geology to participate in the fault study. This will ensure that the study targets the location of potential faults as well as the accuracy of the findings. Their participation will greatly enhance scientific understanding of Fault Hazards in this area as well as the greater Truckee Meadows. Our presentation to the Planning Commissioners on June 6, as provided, includes current best knowledge about Holocene fault location as determined by Nevada State Geologists. The on-site data to be gathered in support of geotechnical characterization must be shared with the State Geologist to allow our State and County geological maps and database to be updated with this crucial information.

7) Road and access beyond Pattie Lane South-Bound. Currently residents of Cross Creek and Callahan Ranch whose properties join up to the area of the proposed Donner Village use the County easement for access to the back of their properties. This access is the southerly extension of Pattie Lane. We request that this easement along the western property line of the proposed Donner Village be maintained.

8) Hammer turnabout should be offered to all residents that feel the need for better safety access to Fawn Lane, Shawna Lane, Cherrywood Drive, Goldenrod Drive, and Tannerwood Drive. Consideration should also be made for Cedarwood Drive. and Wildwood Drive, as there is no assurance that Ascenté residents will not use these roads.

9) County Road Upgrades to accommodate heavy traffic. Fawn Lane and the roads in Callahan Ranch are old roads. The impact to those roads from heavy equipment will greatly reduce their serviceability. Therefore, we request that water trucks and heavy equipment use haul roads such as County road 49 to access the construction site. In addition, existing road design on the corner of Cherrywood and Shawna precludes long trucks such as doubles or triples from using this road.

10) Invalid Conceptual Drainage Report. Although there is already a conditional requirement for a “final hydrology report”, that report must not be based on flawed modeling (HEC-HMS) which estimates current runoff from the property far above measured and observed runoff. Using the current flawed model could allow the developer to discharge stormwater far above that which is now occurring. This excessive stormwater discharge will cause flooding in our existing neighborhood.

Summation

1. In order to ensure that the FAP's goals are achieved, it is incumbent upon the Commission to review Ascenté's proposed plan in conjunction with all of the development that is occurring in Southern Washoe County, as well as other developments that have already been approved (such as Callamont), but not yet initiated. Ascenté's plan should not, and cannot be viewed in a vacuum.
2. There are many flaws in Ascenté's proposal and each issue set forth above, must be considered with the over-all project scope. The Commission is urged to review the entire proposed development together with all of the development in southern Washoe County. When viewed as a whole, and not separate and independent projects, the negative impact on wildlife, schools, roads, climate and the stress on the South Washoe County infrastructure is undeniable and unsustainable.
3. The County Planning Department states that the FAP is a result of many years of planning and projections. However, we now have much more data than we did 20 years ago concerning traffic congestion, overcrowded schools, climate science, the effects of climate change in desert communities, and the effects of continued development on wildlife. To continue to allow (and even promote) the growth that is occurring in Southern Washoe County without reviewing the updated information would be irresponsible.

The commission should take another look to determine exactly how the current development occurring and planned development occurring in Washoe County in its totality is effecting –

- Quality of life for residents in Washoe County
- The impact on Schools;
- Traffic congestion;
- Wildlife;
- Air quality;
- Light pollution;
- Climate change effects –such as higher temperature levels – especially for a desert town (how does Hillary Schieve's statement that she wants to adhere to the Paris Climate accord work with the continued planned sprawl?); and
- Water

TMWA has a proactive approach to managing current water needs – but the State Engineer recently voiced an opposite view regarding the long-term availability of water in Washoe County. Given that the Mt. Rose Aquifer plays a major part in managing water storage for domestic use, the County must also be proactive in ensuring minimal impacts due to increased, development, particularly where storm water and groundwater protections are not considered.

4. The Ascenté development and each issue raised, when viewed independently and in isolation, might seem minor. However, when viewed in the aggregate and in combination with all other development in

southern Washoe County, it becomes clear that the Ascenté planned development as a whole has major flaws . . . it does not comply with the FAP. When we compound one aberration from the FAP upon another, we ultimately end up with a development that completely undermines and circumvents the FAP, effectively gutting it of any substance or worth. The end result is that this will become the precedent by which future developments will be held to in the Washoe Forest Area and this is unacceptable.

5. Finally, while we understand that the County Commission is pressed to provide more housing to Washoe County by approving more development, it should be considered that the reason people live in Reno/Washoe County is precisely because of its rural feel, the wildlife and open spaces. Residents of Callahan/Fawn lane (and no doubt, most residents in Reno/Sparks) do not want to replicate Sacramento, the Bay Area – or Somersett and Damonte Ranch for that matter. Once an area is paved over and developed it is forever lost. The Ascenté Development will forever alter a landscape that is already marred by rampant subdivision and overall urbanization. Let the goals of the FAP protect this area as it was designed to do.