

# COMMUNITY & ENVIRONMENTAL DEFENSE SERVICES

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August 2, 2019

Lily Gabriel  
Gabriel Family Lands  
12000 Red Rock Road  
Reno, Nevada 89508

Russell Earle  
Silver Knolls Community Organization

**RE: Silver Hills & Red Rock Road Traffic Issues  
WMPA 17-0010 and WRZA 17-0005**

Dear Ms. Gabriel & Mr. Earle:

As you requested, we have completed a preliminary analysis of how the proposed Silver Hills project would affect those who live near and rely upon Red Rock Road. The analysis presented in this letter indicates that Silver Hills plus other proposed development will cause severe congestion on Red Rock Road even if it is widened to four lanes. The 2,000 Washoe County residents who rely on Red Rock Road will experience considerable delay. It is also likely that the health and safety of these residents will be placed in jeopardy.

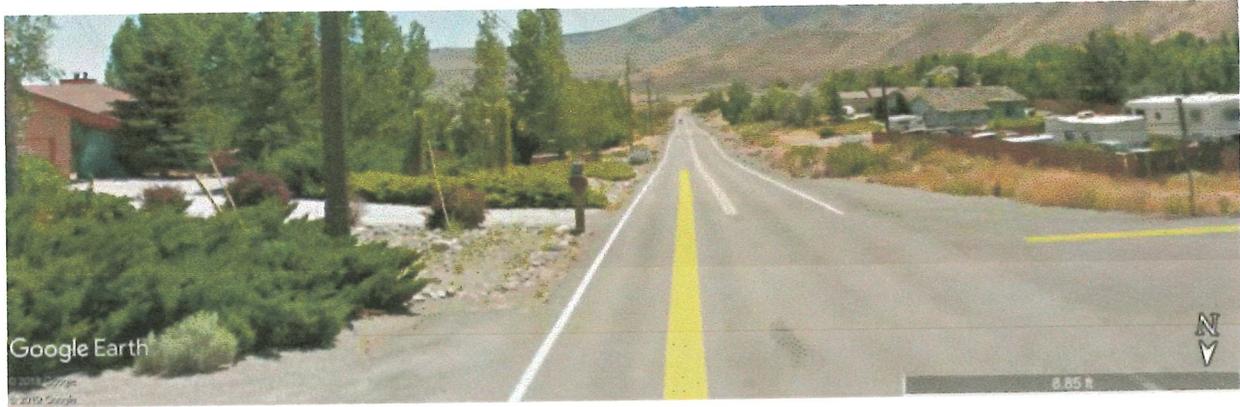
The applicant's *Silver Hills Master Plan Amendment & Specific Plan* document, dated May 15, 2019, contained a July 2018 *Silver Hills Traffic Analysis* and a *Supplemental Traffic Letter*, dated May 10, 2019. These documents failed to address the traffic issues cited above.

As you know we sought to work with the applicant, Lifestyle Homes TND, LLC. At the end of this letter you'll find our May 20, 2019 correspondence to Mr. Lissner of Lifestyle Homes. In our letter we requested an opportunity to meet with Mr. Lissner to discuss a number of concerns, including traffic impacts. On June 6th I spoke with attorney Garrett Gordon who is representing Lifestyle Homes. Though the discussion seemed productive, neither Mr. Gordon or his client has contacted you as promised to set a time to meet.

Because our efforts to find mutually agreeable solutions have come to naught, I must regrettably urge you to call upon the Washoe County Planning Commission to deny the request for approval of a Master Plan Amendment and a Regulatory Zone Amendment until the applicant submits a more complete traffic impact analysis addressing the issues presented in this letter. I also suggest that you ask the Commission to urge the applicant to work with area residents to find ways of developing the Silver Hills site that preserves, and possibly enhances, the quality of life of the 2,000 Washoe County residents potentially harmed by this project.

## RED ROCK ROAD

As shown below, Red Rock Road is presently two lanes in the Silver Knolls and Silver Hills vicinity. As also shown below, the only access to numerous homes is directly off Red Rock Road. These homeowners already experience difficulty turning onto Red Rock Road from their driveways. Note also that the distance between homes on the east and west side of Red Rock Road is limited.

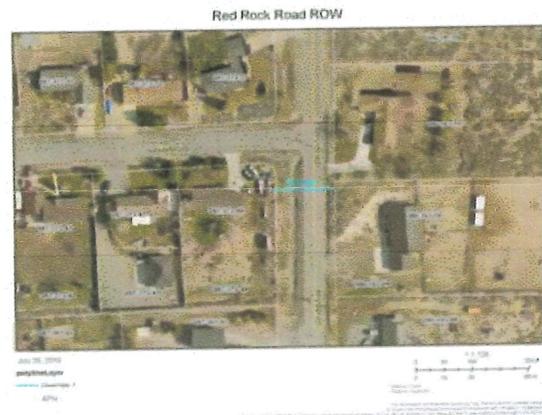


According to the Regional Transportation Commission of Washoe County [Travel Demand Model](#)<sup>1</sup> Red Rock Road serves as the primary access for 736 homes located north of Silver Lake. The Travel Demand Model indicates that this portion of Red Rock Road is operating at a congestion Level of Service (LOS) of "C". The [North Valleys Multimodal Transportation Study](#)<sup>2</sup> calls for an LOS of "D" or better on Red Rock Road.

As Red Rock Road congestion worsens, the nearly 2,000 residents north of Silver Lake may become increasingly isolated from fire, ambulance and other emergency services. Increasing congestion also places these 2,000 souls at greater risk when wild fire and other crises necessitate evacuation. And then there's the daily frustration of having to spend ever greater periods stuck in traffic.

## RED ROCK ROAD AS A FOUR-LANE ROAD

Table A, in the [North Valleys Multimodal Transportation Study](#), calls for widening Red Rock Road to four lanes. The aerial photo to the right is from the [Washoe Regional Mapping](#)



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<sup>1</sup> See: <https://rtcwashoe.maps.arcgis.com/apps/webappviewer/index.html?id=2e4d916f21494e50b682db01e909cbf3>

<sup>2</sup> See: <https://www.rtcwashoe.com/mpo-corridor-plan/north-valleys-regional-transportation-study/>

[System](#)<sup>3</sup>. The aerial shows a portion of Red Rock Road north of Silver Lake. Note that the distance between the property lines east and west of Red Rock Road is a mere 80-feet.

It is unclear to Silver Knolls residents and other area homeowners how a four-lane highway would physically fit in a right-of-way this narrow. These homeowners have a number of questions such as:

Will adding two lanes require destroying our homes?

Would it become impossible to turn onto Red Rock Road from our driveways?

How will increasing traffic volume and congestion affect our health, safety and property value?

Furthermore, as explained in the next section of this letter, six or more lanes may be needed to accommodate Silver Hills and other anticipated growth in the Red Rock Road corridor.

### RED ROCK ROAD TRAFFIC VOLUME & CONGESTION

The table on the next page presents a preliminary analysis prepared by CEDS. The analysis compares the potential impact of Silver Hills and other anticipated growth on Red Rock Road traffic volume and congestion. The Level of Service estimate in the CEDS table is based on criteria presented in Table 2-4, to the right, which appears on page 2-11, of the *North Valleys Multimodal Transportation Study*. Red Rock Road is classified as an Arterial-Moderate Access Control. The RTC Traffic Demand Model indicates that 2020 daily traffic volume on Red Rock Road north of Silver Lake will be 7,342. According to Table 2-4 the two-lane, arterial-moderate access control Red Rock Road is operating at Level of Service "C". The CEDS preliminary analysis indicates that while traffic from Silver Hills alone would maintain a Level of Service of "C" on a four-lane Red Rock Road, the applicant's Traffic Analysis failed to consider the impact of other development proposed for this corridor.

Table 2-4. Average Daily Traffic LOS Thresholds by Facility Type

Facility Type	Maximum Service Flow Rate (daily for given service level)				
	LOS A	LOS B	LOS C	LOS D	LOS E
<b>Freeway</b>					
4	≤ 28,600	42,700	63,500	80,000	90,200
6	≤ 38,300	61,200	91,100	114,000	135,300
8	51,100	81,500	121,400	153,200	180,400
10	63,800	101,900	151,800	191,500	225,500
<b>Arterial-High Access Control</b>					
2	n/a	9,400	17,300	19,200	20,300
4	n/a	20,400	36,100	38,400	40,600
6	n/a	31,600	54,700	57,600	60,900
8	n/a	42,500	73,200	76,800	81,300
<b>Arterial-Moderate Access Control</b>					
2	n/a	5,500	14,800	17,500	18,600
4	n/a	32,000	32,200	35,200	36,900
6	n/a	18,800	49,600	52,900	55,400
8	n/a	25,600	66,800	70,600	73,900
<b>Arterial/Collector-Low Access Control</b>					
2	n/a	n/a	6,900	13,400	15,100
4	n/a	n/a	15,700	28,400	30,200
6	n/a	n/a	24,800	43,100	45,400
8	n/a	n/a	34,000	57,600	60,600
<b>Arterial/Collector-Ultra-Low Access Control</b>					
2	n/a	n/a	6,500	13,300	14,200
4	n/a	n/a	15,300	27,300	28,600
6	n/a	n/a	24,100	41,200	43,000
8	n/a	n/a	33,300	55,200	57,400

Source: Washoe County RTP Table 3-4.

<sup>3</sup> See: <https://gis.washoecounty.us/wrms>

# CEDS Preliminary Analysis of Red Rock Road at Osage Road Congestion & Future Traffic Volume

SCENARIO	LAND USE	UNITS	x	DAILY TRIPS/UNIT <sup>7</sup>	=	TRAFFIC VOLUME		LEVEL OF SERVICE WITH 4-LANES <sup>8</sup>
						Average Daily	Total	
Year 2020 Estimate <sup>1</sup>	Existing					7,342	7,342	NA
Silver Hills 2009 Agreement <sup>2</sup>	Single-family detached homes	680	x	9.24	=	6,283	13,625	C
Silver Hills Acceptable Maximum <sup>3</sup>	Single-family detached homes	780	x	9.24	=	7,207	14,549	C
Silver Hills May 2019 Proposal <sup>4</sup>	Single-family detached homes	1,872	x	9.24	=	17,297	24,639	C
Silver Star Ranch <sup>5</sup>	Single-family detached homes	1,600	x	9.24	=	14,784	39,423	F
Evans Ranch <sup>6</sup>	Single-family detached homes	5,229	x	9.24	=	48,316	87,739	F
Evans Ranch <sup>6</sup>	Townhomes	450	x	5.49	=	2,471	90,210	F

1. The year 2020 estimate was obtained from the Traffic Demand Model developed by the Regional Transportation Commission of Washoe County, Nevada at:

<https://rtcwashoe.maps.arcgis.com/apps/webappviewer/index.html?id=2e4d916f21494e50b682db01e909cbf3>

2. The 2009 development agreement limited Silver Hills to 680 single-family lot:

[https://www.washoecounty.us/csd/planning\\_and\\_development/applications/files-planning-development/comm\\_dist\\_five/2017/files/BCC%2002-28-17%20-%20Staff%20Report%20-%20with%20attachments%20-%202nd%20Reading%20-%20Silver%20Hills.pdf](https://www.washoecounty.us/csd/planning_and_development/applications/files-planning-development/comm_dist_five/2017/files/BCC%2002-28-17%20-%20Staff%20Report%20-%20with%20attachments%20-%202nd%20Reading%20-%20Silver%20Hills.pdf)

3. Silver Knolls area residents believe it may be possible to build as many as 780 homes on the Silver Hills without excessively harming their quality of life.

4. The *Silver Hills Master Plan Amendment & Specific Plan* document, dated 5-15-2019, indicated the project would add 13,878 average daily trips to Red Rock Road. However, this appears to be based on the 9th Edition of Trip Generation, not the current 10th Edition. The trips shown above are based on the 10th Edition and the daily trip generation for the Silver Hills proposed land use given in the document at:

[https://www.washoecounty.us/csd/planning\\_and\\_development/applications/files-planning-development/comm\\_dist\\_five/2019/Files/WMPA17-0010 WRZA17-0005 ap v5.pdf](https://www.washoecounty.us/csd/planning_and_development/applications/files-planning-development/comm_dist_five/2019/Files/WMPA17-0010 WRZA17-0005 ap v5.pdf)

5. On page 21, of the Silver Hills Fiscal Impact Analysis, it is stated that Silver Star Ranch is proposed as 1600 single-family detached homes. The fiscal analysis appears in the Silver Hills Master Plan Amendment & Specific Plan document, dated 5-15-2019.

6. Evans Ranch land use is based on Table 1, in the Evans Ranch Planned Unit Development Handbook of January 2014 at:

<https://www.reno.gov/home/showdocument?id=44891>

7. Trips per unit were obtained from Trip Generation, 10th Edition, by the Institute of Transportation Engineers (ITE) at:

<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/trip-generation-10th-edition-formats/>

8. According to the North Valleys Multimodal Transportation Study (*see link below*), dated February 20, 2017, Red Rock Road is classified as a Medium Access Control Arterial (page 2-1) slated to be widened to 4 lanes (page ii), and would drop to a Level of Service: "D" at greater than 32,200 trips per day, LOS "E" at greater than 35,200 trips/day, and LOS "F" at greater than 36,900 trips/day (page 2-11). At a Level of Service "D" rush-hour traffic moves at about half the average speed of non-rush-hour traffic and cut-thru traffic on adjoining neighborhood streets begins to rise. The existing two-lane road would drop from Level of Service "C" to "D" at 6,900 trips/day (page 2-11)

<https://www.rtcwashoe.com/mpo-corridor-plan/north-valleys-regional-transportation-study/>

Figure 2, to the right, appears on page 20, of the *Silver Hills Fiscal Impact Analysis*<sup>4</sup>, which is part of the *Silver Hills Master Plan Amendment & Specific Plan* document. Figure 2, shows three residential projects in the Red Rock Road corridor north of Silver Lake:

- #7 Silver Hills 1,872 housing units,
- #2 Silver Star Ranch 1,600 housing units, and
- #1 Evans Ranch 5,679 housing units.

Note that both Silver Star Ranch and the Evans Ranch are located north of the Silver Hills site. The CEDS table on the preceding page shows that in addition to the 17,297 daily trips from Silver Hills, these other two proposals would add another 14,784 and 50,787 daily trips, respectively. All three projects would raise Red Rock Road traffic volume to 90,210 trips per day causing congestion to reach a Level of Service of "F" or grid lock.

The impact of these other Red Rock Road corridor projects is *NOT* addressed in the applicant's Traffic Analysis. According to *North Valleys Multimodal Transportation Study* Table 2-4, Red Rock Road would need to become a six-lane Freeway to maintain the standard of an Level of Service of "D" or better with a daily traffic volume of 90,210.

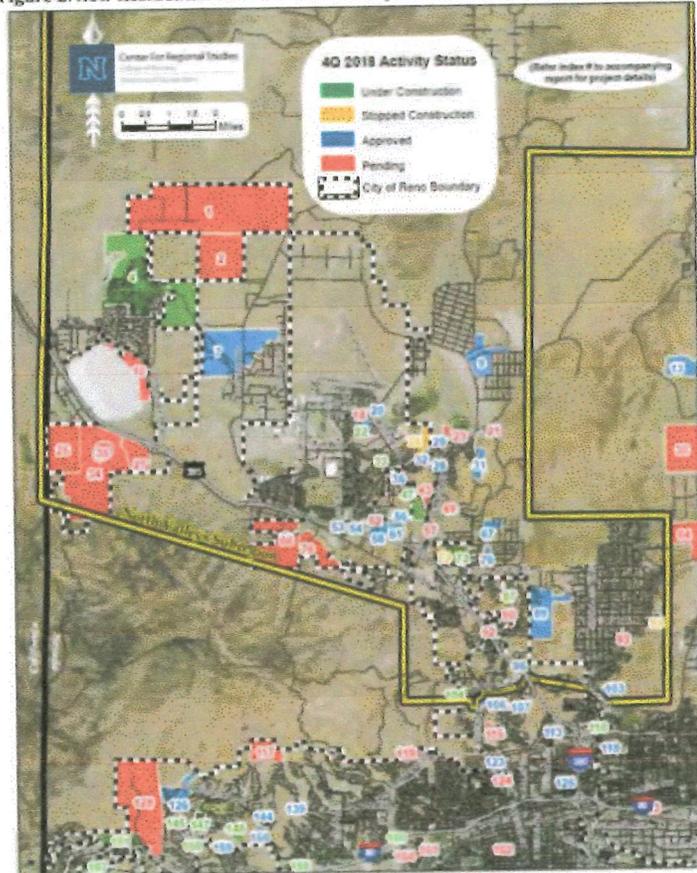
### HEALTH, NOISE & PROPERTY VALUE IMPACTS

Table 1-1, on page 4, of the *California Air Quality and Land Use Handbook: A Community Health Perspective*<sup>5</sup> recommends that homes should be a minimum of 500 feet from rural roads carrying more than 50,000 vehicles per day (vpd). Following is an excerpt from the Handbook providing the basis for this recommendation:

<sup>4</sup> The fiscal analysis appears in the *Silver Hills Master Plan Amendment & Specific Plan* document, dated 5-15-2019.

<sup>5</sup> See: <https://www.arb.ca.gov/ch/handbook.pdf>

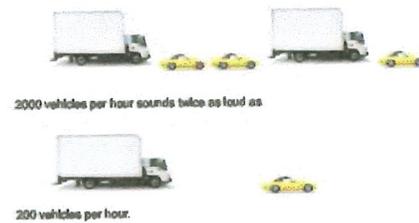
Figure 2. New Residential Construction Activity, North Valleys Subregion-4Q2018<sup>13</sup>



*"The combination of the children's health studies and the distance related findings suggests that it is important to avoid exposing children to elevated air pollution levels immediately downwind of freeways and high traffic roadways. These studies suggest a substantial benefit to a 500-foot separation."*

The CEDS table on page 4 of this letter shows that Silver Hills alone would raise Red Rock Road traffic volume much closer to the 50,000 vpd threshold. Silver Hills plus the Silver Star Ranch and Evans Ranch would raise traffic volume to 90,210 trips/day, nearly twice the 50,000 vpd threshold. The children residing in numerous homes would be within 500 feet and therefore exposed to the unhealthy emissions of Red Rock Road traffic.

The illustration to the right shows that as traffic volume increases so does the noise emitted from a road. With Silver Hills alone, Red Rock Road traffic volume would triple and then the Evans and Silver Star Ranch projects would cause a 12-fold increase. Highway noise can adversely effect the [health](#)<sup>6</sup> of those residing in area homes as well as the [value](#)<sup>6</sup> of their property.



### **SUMMARY OF SILVER HILLS TRAFFIC RELATED CONCERNS**

Following is a summary of the preceding concerns which are shared by many of the 2,000 Washoe County residents potentially impacted by Silver Hills, Silver Star Ranch and the Evans Ranch traffic impacts:

1. Red Rock Road congestion has already reached the point where area residents experience considerable delay,
2. Even with a four-lane Red Rock Road, the traffic generated by Silver Hills plus Silver Star Ranch and Evans Ranch will cause congestion to reach the most severe Level of Service rating of "F" or grid lock,
3. This severe congestion will jeopardize public safety by delaying emergency service vehicles and impeding evacuations should disasters such as wild fire occur,
4. Silver Hills alone will push traffic volume halfway to the 50,000-vehicle per day threshold where the health of children residing within 500 feet of Red Rock Road is threatened. If the Silver Star Ranch and Evans Ranch projects are also built then traffic volume could exceed 90,000 vehicles per day,
5. Red Rock Road would need to be converted to a six-lane freeway to accommodate the traffic from Silver Hills, Silver Star Ranch and the Evans Ranch.

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<sup>6</sup> See: <https://ceds.org/traffic/#noise>

6. Numerous homes front onto Red Rock Road. The Washoe County residents living in these homes presently have difficulty exiting their driveway at rush-hour. By tripling Red Rock Road traffic volume, Silver Hills will make entering traffic flow from these homes more difficult and dangerous. When combined with Silver Star Ranch and the Evans Ranch traffic, turns may become impossible during rush-hour.
7. It is unclear how Red Rock Road could be widened to four-lanes, much less six, without necessitating the demolition of homes or, at the very least, perpetually subjecting nearby residents to excessive traffic noise, vibration, air pollution, adverse health effects, and loss of property value.

The applicant's July 2018 *Silver Hills Traffic Analysis* and the May 2029 Supplemental Traffic Letter failed to address the concerns listed above. Therefore, I urge you to call upon the Washoe County Planning Commission to deny the request for approval of a Master Plan Amendment and a Regulatory Zone Amendment until the applicant submits a more complete traffic impact analysis addressing the issues presented in this letter.

#### **AREA RESIDENTS NOT OPPOSED TO SILVER HILLS DEVELOPMENT**

For ten years area residents negotiated with development interests regarding the type of Silver Hills growth which would be compatible with Silver Knolls area quality of life. Those negotiations led to a 2009 agreement allowing 680 housing units on the 780-acre Silver Hills site. The CEDS table on page 4, of this letter shows that while 680 homes would increase Red Rock Road traffic volume, congestion would remain within the tolerable Level of Service of "C".

In a letter dated May 20, 2019, we sought to reopen negotiations with the applicant, Lifestyle Homes, and offered to consider an increase of up to 100 housing units above the 2009 limit of 680 homes. Our May 20th letter follows this document. Unfortunately the applicant never met with us to pursue these negotiations. Nevertheless, we remain willing to seek a mutually satisfactory solution.

It is for this additional reason that I again urge you to call upon the Washoe County Planning Commission to deny the request for approval of a Master Plan Amendment and a Regulatory Zone Amendment. I also suggest that you ask the Commission to urge the applicant to work with us to find ways to develop Silver Hills that preserves and possibly enhances Silver Knolls area quality of life.

Lastly, the [\*North Valleys Multimodal Transportation Study\*](#)<sup>7</sup> appears to have only considered about a third of the traffic volume resulting from Silver Hills, Silver Star Ranch and the Evans Ranch. While the widening of Red Rock Road to four-lanes recommended in the study may accommodate Silver Hills or Silver Star Ranch, it would not be adequate for all three.

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<sup>7</sup> See: <https://www.rtcwashoe.com/mpo-corridor-plan/north-valleys-regional-transportation-study/>

Therefore, the Planning Commission should consider options such as capping Red Rock Road corridor growth at that which would maintain a Level of Service of "D" or better on a four-lane road and/or calling upon the Regional Transportation Commission to revise the [North Valleys Multimodal Transportation Study](#).

Sincerely,



Richard D. Klein

# COMMUNITY & ENVIRONMENTAL DEFENSE SERVICES

Richard D. Klein, President  
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May 20, 2019

Mr. Bob Lissner  
Lifestyle Homes TND, LLC  
4790 Caughlin Parkway, #519  
Reno, Nevada 89519

## **RE: Silver Hills & Preserving Silver Knolls Quality of Life**

Dear Mr. Lissner:

We are assisting Silver Knolls area residents with concerns regarding the Silver Hills project. It appears there are a number of options for finding [equitable solutions](#) that resolve our clients concerns while allowing extensive development of the Silver Hills site.

### **WE ARE OPEN TO MORE THAN 680 RESIDENTIAL UNITS**

Many of our clients participated in the ten-year negotiations that resulted in the March 16, 2009 development agreement for 680 residential units on the 782-acre site. The February 14, 2019 [Silver Hills Specific Plan and Suburban Character Management Area](#) document calls for 1,654 units on the same 782-acre site. This is an increase in density of 2.4-times.

Our clients are deeply concerned that this tremendous increase in density has been proposed without the same in-depth discussions which resulted in the 2009 agreement. Frankly, though, there are aspects of the 2019 proposal which our clients find superior to the development depicted in the 2009 agreement. For example, the buffers, height limit, and housing density proposed for Silver Hills East (*see map to right*) is more compatible with the homes that adjoin this portion of the site, though suggestions for increasing compatibility are offered in this letter.



*From 2019 Silver Hills Specific Plan*

We believe it is possible to slightly increase the number of units beyond the previously approved 680 units without causing excessive harm to our quality of life. We are open to again renewing discussions provided you temporarily withdraw your request that Washoe County consider creating a new Silver Hills Suburban Character Management Area for the Silver Hills Specific Plan area.

### **QUALITY OF LIFE CONCERNS**

Following are the specific quality of life issues of concern to our clients. The 2019 [Silver Hills Specific Plan and Suburban Character Management Area](#) document did not fully address these concerns:

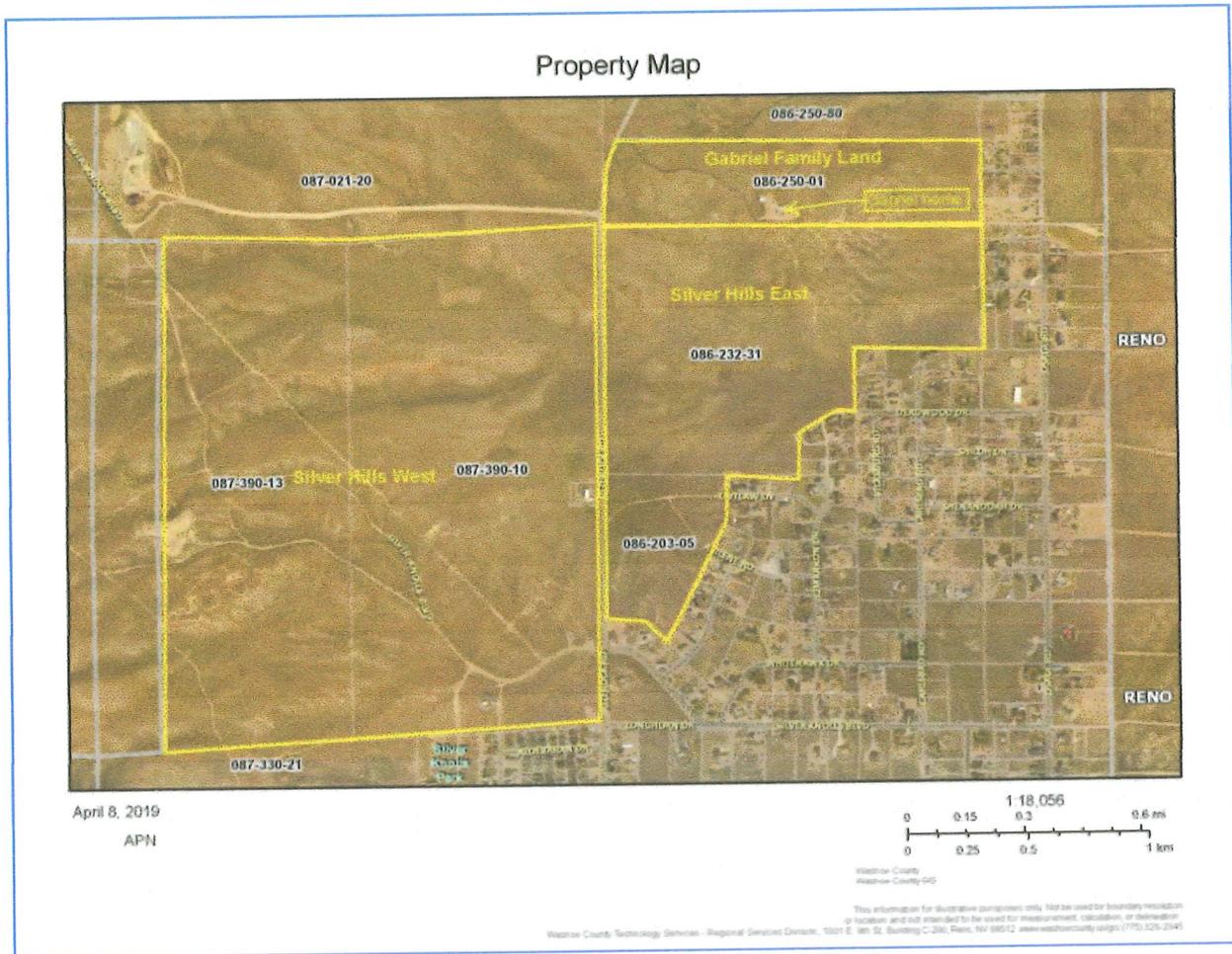
- Traffic congestion on main roads and timing of lane additions relative to growth phasing;
- Increased cut-thru traffic on neighborhood streets if main road congestion rises,
- Possibility that existing homes would be required to connect to public water-sewer and the associated costs,
- Effect of Silver Hills project on property valuation and property taxes,
- Stormwater and flood effects,
- School capacity and overcrowding,
- Over crowding of park and recreation facilities,
- Fire, ambulance, police and emergency services response times,
- Loss of views,
- Overwhelming retail services and long check-out lines,
- Increased use of mosquito control agents, then drift into nearby homes, and livestock effects,
- Increased trespass onto neighboring properties,
- Inadequacy of the road impact fees from the Silver Hills development to fund the widening of Red Rock Road (shortfall of \$3.5-4.5 million) and who will end up paying for any shortfall,
- Increased fire risk due to the high density of proposed new homes contributing to a *much* higher fire load and the decrease in the available emergency service resources the new development will take from Silver Knolls, and
- Where to store/dispose of 300+ million gallons of sewer effluent annually without a detrimental effect on domestic wells and neighborhood health.

Again, we believe all of the issues listed above can be resolved through in-depth discussions such as those that led to the 2009 agreement. Following is an example of how a specific concern of area residents can be resolved.

### **GABRIEL FAMILY LAND ENHANCED COMPATIBILITY EXAMPLE**

The Gabriel family owns the 80-acre parcel (086-250-01) located north of proposed Silver Hills East (*see map on next page*). The family home is situated just north of a ridge overlooking Silver Hills East. The Gabriels are planning to add several homes for military veterans, some of whom

may suffer from Post Traumatic Stress Disorder (PTSD). Additionally, the Gabriels plan to expand equestrian facilities and other amenities for their veteran guests.



The Gabriel family is concerned that Silver Hills East may detract from the peace and sense of solitude essential to helping veterans cope with the PTSD they suffer due to their service to our country. Specifically, Silver Hills may cause a loss of the scenic views presently enjoyed from the Gabriel home and other nearby portions of the 80-acre parcel. Additionally, the Gabriels are concerned that locating homes in close proximity may bring back the trespass issues they endured three years ago after purchasing their land.

Following are our initial thoughts on ways that these potential effects to Gabriel lands could be resolved without causing an undue loss of Silver Hills development potential.

1. A landscaped earth berm could be constructed within the 50-foot buffer along the Silver Hills side of the common boundary with the Gabriel family land.

2. The berm could be designed to obscure Silver Hills homes and other structures from being seen from the Gabriel home and other locations on Gabriel land where veteran homes are envisioned. Given that a ridge line runs along a good portion of the common boundary and the land slopes somewhat steeply to the immediate south, it may not be necessary to have an overly long or high landscaped berm.
3. A fence, such as one of six-foot high chain link, would be placed atop the berm and hidden within the landscaping to minimize trespass.
4. Other steps that would further preserve the tranquility of the Gabriel family land and veterans refuge could include:
  - a. Locating a portion of the Open Space Regulatory Zone along the common border with the Gabriel family land, and/or
  - b. Locating the following features referenced in Section 1.3, of the Silver Hills Specific Plan, along the common border:

*"It is planned to incorporate numerous evergreen plantings along with unique landscape and open space treatments that may include fruit orchards, gardens, ponds, and natural open spaces that accentuate the views, natural terrain, and site features."*

Of course the Gabriel family is open to any other approach which achieves their goal of preserving their land as a sanctuary for veterans. It is our hope that you will work with us to find solutions, such as those listed above for the Gabriel land, to the other quality of life concerns presented on page two. It is also our hope that we can find a balance which preserves Silver Knolls quality of life while minimizing Silver Hills development constraints.

#### **CLOSING**

I will call in a few days to answer any questions you may have regarding this request. In the meantime I can be reached at 410-654-3021 or [Rklein@ceds.org](mailto:Rklein@ceds.org).

Sincerely,



Richard D. Klein

cc: Ms. Lily Gabriel, Gabriel Family Trust Lands  
Russell Earle, Silver Knolls Community Organization

Honorable Jeanne Herman, Board of County Commissioners  
Mojra Hauenstein, Director, Washoe County Department of Planning and Zoning  
Roger Pelham, Washoe County Department of Planning and Zoning

Silver Knolls Community Organization  
11525 Red Rock Rd.  
Reno, NV 89508  
August 02, ~~2019~~  
2019

Dear Washoe County Commissioners and Planning Commission,

This letter is being written on behalf of the residents of Silver Knolls and the surrounding Red Rock Community to adamantly oppose the current Silver Hills development plan proposed by Lifestyle Homes. The Silver Knolls Community Organization (SKCO) was previously the Silver Lake Property Owners Association (SLPOA) and had spent hundreds of hours over years negotiating the previously approved Silver Hills Plan with Lifestyle Holmes and Bob Lissner, which has since been abandoned in bad faith by Lifestyle Homes. We oppose the current plan proposal for the following reasons:

1. The proposed request to allow medium density development (average of 3 homes per acre) is incompatible with our current surrounding zoning and current lot acreages, which now is almost 3 acres per home for the 595 parcels in Silver Knolls. The request is also in violation of section NV.1.5 of the North Valleys Area Master Plan that does not allow this density of development in the Silver Knolls Suburban Character Management Area. The previously approved plan adhered to our current zoning of one home per acre, the currently proposed plan does not comply.
2. The current development proposal for Silver Hills is not in compliance with the Washoe County Master Plan and for the Silver Knolls Suburban Character Management Area in the following sections:
  - a. NV.4.1 requiring a minimum of 50% of the residential parcels be at least one acre in size
  - b. NV.4.2 requiring the minimum size of residential parcels be at least 0.5 acres.
  - c. NV.4.6 requiring that residential garages will be sized at a minimum for two vehicles.
  - d. Goal eleven (pertaining to air quality) will be violated with over 11,000 vehicle trips per day, significantly contributing to ozone and particulate pollution degrading the air in the North Valleys.
  - e. We have not seen any adherence to goal Thirteen, pertaining to wildlife and the requirement that the Nevada Department of Wildlife be contacted and given the opportunity to provide conservation, preservation, or other wildlife and habitat management input to the project. The project area is known to be a habitat for deer, antelope, bobcats, coyotes, and many smaller animals.

- f. The proposed Silver Hills Plan may violate Goal Seventeen and Nineteen pertaining to preservation of water quality in the hydrologic basin. Plans have been proposed to discharge sewage effluent via deep well injection, potentially contaminating not only our local domestic wells, but numerous Truckee meadows Water Authority extraction wells. More on this later.
    - g. The current proposed plan is in direct violation of Goal Twenty, amendments to the plan are only allowed when they conform to the vision and character statement. Although it does say that amendments can be made for changing circumstances, adding money to a developers bottom line is, in our opinion, not a changing circumstance and would still need to adhere to the vision and character statement.
    - h. Goal Twenty NV.20.3.a also requires that in order for the Washoe County Planning Commission to recommend approval of any amendment involving a change of land use (ie. SP) that a feasibility study has been conducted, commissioned, and paid for by the applicant relative to municipal water, sewer, and storm water. Our main concern is with sewer treatment effluent and where to discharge it. Our questions to the developer on this issue have NOT been addressed at this time, only being told that it will be the County's issue to solve.
    - i. Goal Twenty NV.20.3.c and NV.20.4 have not been complied with pertaining to the proposed commercial and retail land use in their plan. No "convincing evidence" been provided that shows the proposed commercial land use is community serving in nature.
  3. The proposed Silver Hills development would add over 1870 homes and Produce approximately 748,000 gallon of sewer effluent per day (based on a low estimate of 400 gallons per home per day). Cold Springs Valley, Silver Knolls, and Lemmon Valley are all located in closed hydrologic basins. This means that any water that comes into these valleys has no way to exit other than by evaporation or very slow to non-existent infiltration. The Stead and Lemmon Valley sewer treatment plants are at permitted discharge maximums at the current time and the Silver Hills development would be tied to these treatment plants. Until such time as a definitive plan can be come up with and implemented to safely discharge the added effluent, we feel that development must be curtailed by both the City of Reno and Washoe County to protect the health and safety of the residents on the North Valleys so that we do not recreate the flooding issues of Lemmon Valley.
  4.
    - a. Washoe County currently is unable to provide adequate emergency services to the Silver Knolls areas, adding 1870+ homes would only make the problem worse. It is routine to call for Washoe County Sheriff assistance and be told there are no deputies available. I personally have called in an immediate live safety situation and been told the closest unit was on North Pyramid highway, 30 minutes

away. The current situation is unacceptable and needs to be fixed before additional homes are built.

b. Fire protection is another area of concern. The proposed Silver Hills development would be in a wildland interface area. Increasing the density of the housing to an average of 3 homes per acre (and as many as 7-11 in areas of the development) would drastically increase the risk to not only the proposed development but to ALL of the existing Silver Knolls community. Being a retired professional firefighter and Officer for the City of Oakland in the Bay area, I am very familiar with wildland interface risks. The Tubbs fire in Santa Rosa caused more than 5500 homes to be destroyed in Coffee Park. The housing density in Coffee Park was similar to the proposed Silver Hills development and would present similar hazards here. I have spoken to the Fire Marshall of Santa Rosa and asked about the role of density in that fire and was told that although density was not causal, it was a direct contributor to the extreme loss of structures due to the fire igniting adjoining structures due to radiant heat and their close proximity to each other. We highly recommend that the existing zoning be adhered to in order to reduce this extreme risk to our community.

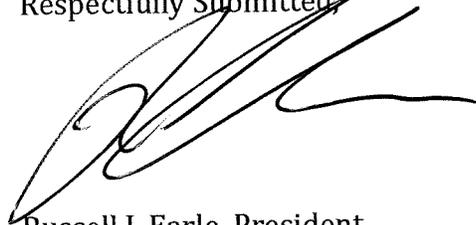
c. Traffic congestion is currently a serious problem in the North Valleys. The addition of well over 17,000+ vehicle trips per day from the proposed Silver Hills development would only make the current condition worse (please see the attached letter from Richard Klein of Community & Environmental Defense Services that did a detailed traffic analysis of the proposed plan). We understand that the Silver Hills traffic study assumes that Red Rock Road will be widened to 2 lanes in either direction some time in the future, RTC does not have a definitive date for that to occur and only has a ball park of 2026. Additionally, even if Red Rock Road is widened, the improvements to 395, and the choke point Spaghetti Bowl, are not set in stone for a definitive construction date. As in the past, NDOT has projected that improvements are necessary but has no funding for construction or hard implementation dates as of this time. Therefore, we highly recommend that development be curtailed until infrastructure improvements have funding and can be scheduled for implementation.

The residents of Silver Knolls strongly oppose the current Silver Hills development plan for the above outlined reasons along with additional objections to increased noise, environmental impact, light pollution, school overcrowding, potential crime, and reduced property values in our area, which would in turn reduce Washoe County Tax revenue on our properties. The proposed Silver Hills homes, we were told by Peter Lissner, would be in the \$280k price range, a full \$120k below the average Washoe County home and well below the current home sales value in Silver Knolls. We would also like to note that if Lifestyle Homes were to revert to the original plan to build 680 homes on their 780 acres, we would not be objecting to that plan. We are not against responsible development, just ill-advised and irresponsible development that does not fit in with our current Master Plan and zoning and lifestyle as outlined in the Silver Knolls Character Management Plan.

The Regional Plan also states that infill development should occur before peripheral development and that density of the magnitude that Silver Hills is looking for should be reserved for the closer core area of the Reno area. We would also like to point out that throughout the planning process the primary concern has been density above the current zoning and the addition of commercial and retail space to their plan. These two concerns have been voiced to their development team time and time again, but it has fallen on deaf ears as they, time and time again, have not revised their plans to address our concerns.

We hope that the County Commissioners and Planning Commission adhere to our mandated Master Plan and the zoning it stipulates and advises a no vote on this proposal. We have attached a copy of our petition in opposition to the Silver Hills development plan signed by almost 500 residents at this time.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'R. Earle', with a long horizontal flourish extending to the right.

Russell J. Earle, President  
Silver Knolls Community Organization