



Board of Adjustment Staff Report

Meeting Date: February 5, 2026

Agenda Item: 8B

VARIANCE CASE NUMBER: WPVAR25-0011 (515 Rhodes Wall Height Variance)

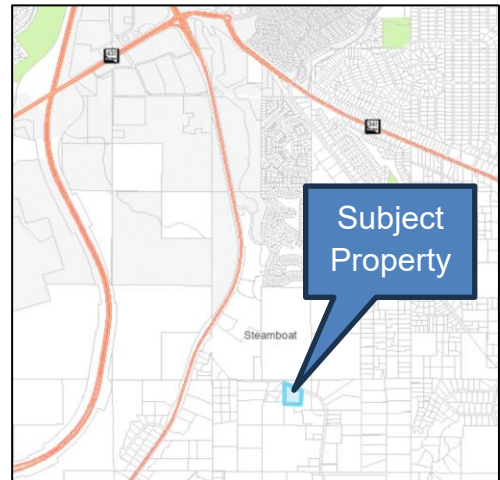
BRIEF SUMMARY OF REQUEST: To vary the six (6) foot maximum height standard for a residential wall.

STAFF PLANNER: Jolene Bertetto, Planner
775.328.6101
jbertetto@washoecounty.gov

CASE DESCRIPTION

For hearing, discussion, and possible action to approve a variance to exceed the maximum wall height from six feet (6') to fifteen feet, eight inches (15' 8"). The proposed variance is requested to bring into compliance an existing ninety-five-foot (95') long wall with a height of fifteen feet, eight inches (15' 8"). The wall is located along the property's east side.

Applicant:	Curtis and Judy Coulter
Property Owner:	Red Dog Trust
Location:	515 Rhodes Road Reno, NV 89521
APN:	017-400-19
Parcel Size:	5.03 acres
Master Plan:	Suburban Residential
Regulatory Zone:	Low Density Suburban (LDS)
Area Plan:	South Valleys
Development Code:	Authorized in Article 804, Variances
Commission District:	2 – Commissioner Clark



Vicinity Map

STAFF RECOMMENDATION

APPROVE

APPROVE WITH CONDITIONS

DENY

Staff Report Contents

Variance Definition 3

Site Plan 4

Project Evaluation 6

Reviewing Agencies..... 9

Public Comments10

Staff Comment on Required Findings10

Recommendation11

Motion11

Appeal Process12

Exhibits Contents

Agency Comments Exhibit A

Public Comments Exhibit B

Public Notice Exhibit C

Project Application..... Exhibit D

Variance Definition

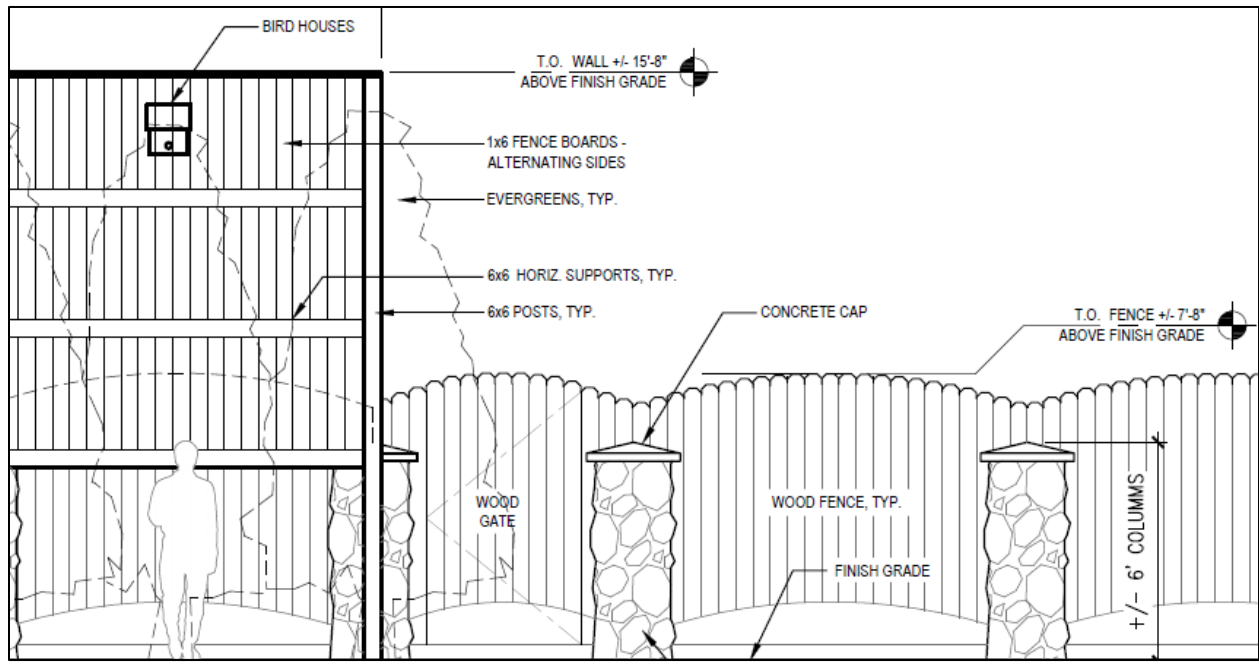
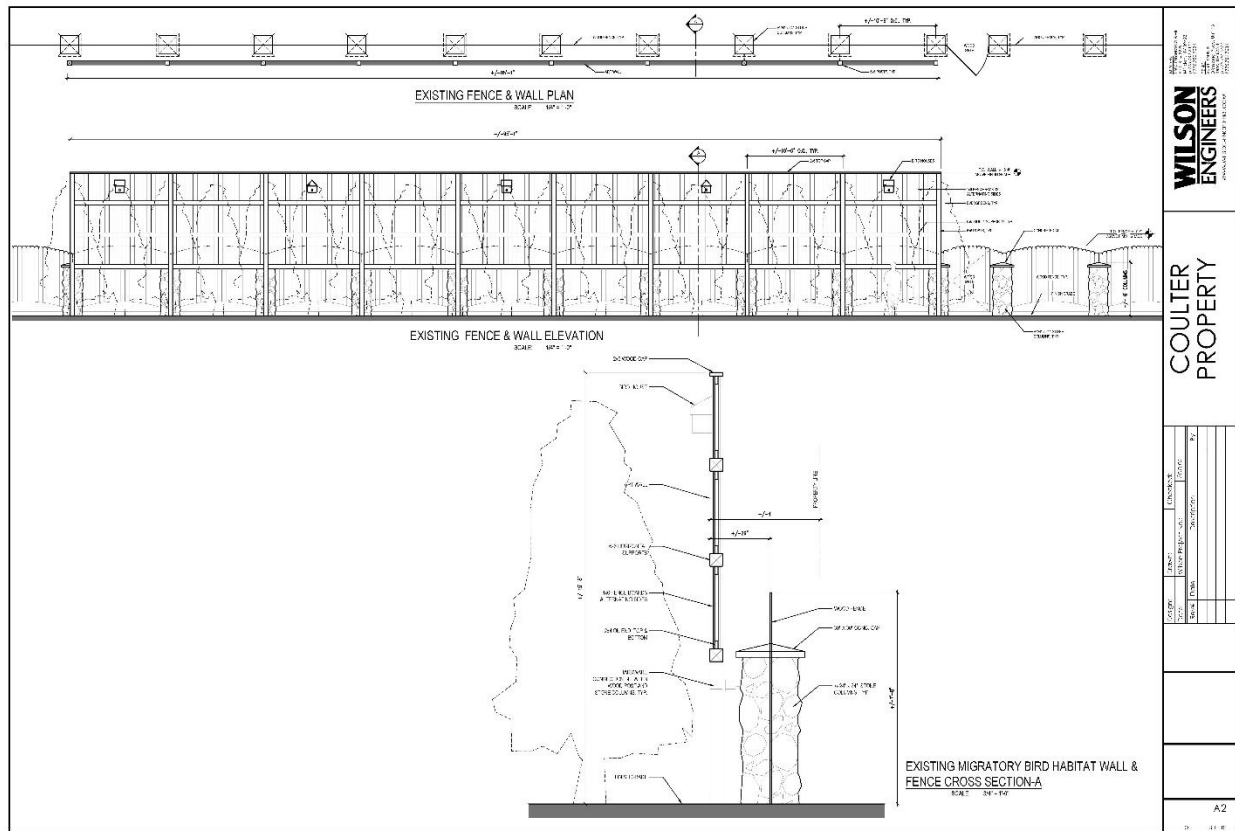
The purpose of a variance is to provide a means of altering the requirements in specific instances where the strict application of those requirements would deprive a property of privileges enjoyed by other properties with the identical regulatory zone because of special features or constraints unique to the property involved; and to provide for a procedure whereby such alterations might be permitted by further restricting or conditioning the project so as to mitigate or eliminate possible adverse impacts. If the Board of Adjustment grants an approval of the variance, that approval is subject to conditions of approval. Conditions of approval are requirements that need to be completed during different stages of the proposed project. Those stages are typically:

- Prior to permit issuance (i.e., a grading permit, a building permit, etc.).
- Prior to obtaining a final inspection and/or a certificate of occupancy on a structure.
- Prior to the issuance of a business license or other permits/licenses.
- Some conditions of approval are referred to as “Operational Conditions.” These conditions must be continually complied with for the life of the business or project.

The applicant is seeking variance on the wall height requirements per section 110.406.50(a) of the Washoe County Code. The Board of Adjustment will be ruling on this request.

Variance Requested	Relevant Code
Wall greater than 6 ft in height.	(110.406.50(a))

The subject property has a regulatory zone of Low Density Suburban (LDS). Pursuant to Washoe County Code (WCC) Section 110.406.50(a) *Fences, Walls or Perimeter Planting*, the maximum height for fences and walls on a residential property is six (6) feet, necessitating the request for a variance.



Elevations

Project Evaluation

The applicant is requesting to increase the maximum wall height along the side yard of their property from six feet (6') to fifteen feet, eight inches (15' 8"). Varying the standard would bring into compliance an existing wall located near the eastern property line. The wall is fifteen feet, eight inches (15' 8") in height, as shown in the elevations diagram on page 5. According to the applicant, the wall structure has been in place for eight (8) years.

On October 14, 2025, the applicant received an administrative enforcement warning after a complaint was received by the Washoe County Planning and Building Department and a subsequent inspection on November 18, 2025 confirmed the code violation.

According to the applicant, the wall was constructed to shield a maturing arboretum from high winds and to protect the migratory bird population which utilizes the trees. Additionally, the applicant mounted various birdhouses to the wall to provide additional wildlife shelter. The applicant refers to the wall in their variance application as a "wildlife preservation wall."

Approval of a variance is limited to special circumstances as described in Nevada Revised Statutes (NRS 278.300). The applicant has the responsibility to demonstrate that the subject property exhibits one or more of the following characteristics to demonstrate a hardship: 1) exceptional narrowness, shallowness, or shape of a specific piece of property; or 2) by reason of exceptional topographic conditions; or 3) other extraordinary and exceptional situation or condition of the piece of property. If such a finding of fact can be made, then the Board must determine that the strict application of the regulation would result in exceptional practical difficulties to, or exceptional and undue hardships upon, the owner of the subject property.

Hardships

Exceptional narrowness and shape of the property

The wall is located along the eastern property line, which has a length of 375.59'. The width of the property at the southern end is 439.52', and the width at the northern end is 504.24', as detailed in Figure 1 below.

The minimum parcel width required by WCC Section 110.406.05 for a LDS parcel is 120 feet. Narrowness of the parcel is not a limiting factor in the applicant being able to construct a fence and/or wall to meet the height limit of 6 feet. The minimum parcel size for this regulatory zone is 35,000 square feet. The parcel size being 219,106.8 square feet (5.03 acres) is over 6 times greater than that required by the Code. Additionally, the parcel shape is not unique to this property.

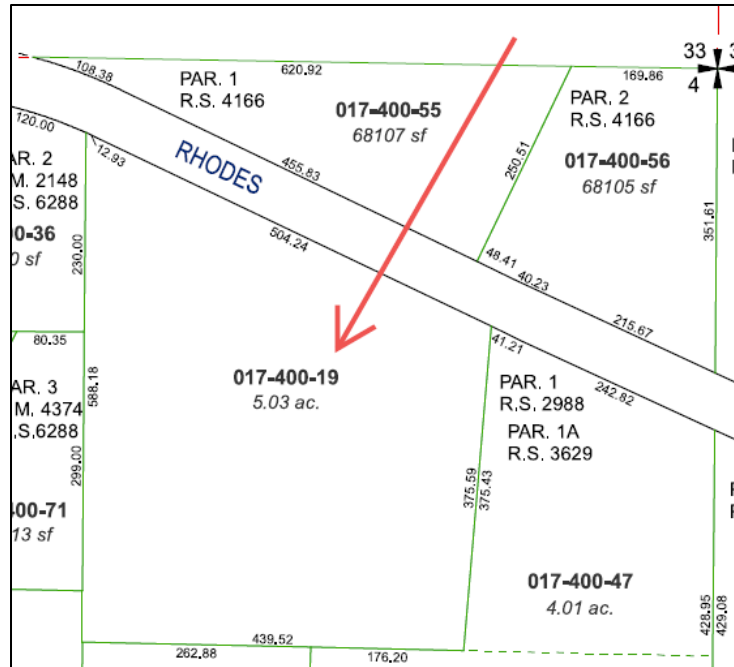


Figure 1. Parcel Dimensions

Topographic Conditions

As shown in Figure 2 below, the contour lines indicate fairly level and gently sloping topography on the subject property. Other properties in the area have similar topography and do not have walls exceeding the 6 feet height limit. Therefore, the parcel's topography is not a limiting factor and does not meet the criteria for an exceptional situation or condition of the property



Figure 2. Topography

Extraordinary Circumstances

According to the applicant, the extraordinary circumstance that resulted in the construction of the wall was the removal of a mature freemont cottonwood tree from the subject property that provided shelter for wildlife. The applicant planted new trees for migratory birds and built the wall to shield the trees from high winds while providing habitat and shelter through mounted bird houses. The applicant states in their application:

“The Property is in a unique area surrounded by local wildlife and the Applicants made a concerted effort to mitigate loss of natural resources and cultivate the migratory bird population, which squarely aligns with conservation efforts outlined in the Envision Washoe 2040 Master Plan, highlighting protection efforts for ‘key wildlife and fishery habitats; habitats of threatened, endangered, or rare species; key migration routes; and areas important for scientific study’.

Therefore, the Applicants are prevented from complying with the Development Code requirements, as to do so, would result in harm to the local migratory bird population in direct contravention of Master Plan goals.”

While staff acknowledge that the wall provides shelter through mounted bird houses, as seen in Figure 3, the choice of the applicant to construct the wall to shield new trees planted after the removal of a mature tree does not constitute an extraordinary circumstance. The property is not uniquely situated for providing wildlife habitat any more than the surrounding parcels in the same regulatory zone.



Figure 3. Bird Houses

Staff finds that the applicant has not demonstrated that the subject property exhibits hardships as required by Nevada Revised Statutes and recommends denial of the variance.

Reviewing Agencies

The following agencies/individuals received a copy of the project application for review and evaluation. No conditions or recommendations were provided.

Agencies	Sent to Review	Responded	Provided Conditions	Contact
Washoe County Water Rights Manager (All Apps)	X	X		
WCSO Law Enforcement	X			
Washoe County Engineering (Land Development) (All	X			
Washoe County Engineering & Capital Projects Director (All Apps)	X	X		
NNPH Environmental Health	X			
TMFPD	X	X		

Public Comments

Staff received eight public comments in support of the wall, including a letter of support from the property owner of the parcel directly to the east of the wall. The public comments are in Exhibit B.

Staff Comment on Required Findings

Washoe County Development Code Section 110.804.25, Article 804, *Variances*, requires that all of the following findings be made to the satisfaction of the Washoe County Board of Adjustment before granting approval of the request. Staff has completed an analysis of the variance application and is unable to make the first finding of special circumstances and third finding of no special privileges. Staff is able to make the additional findings. Staff has determined that the proposal is in compliance with the required findings as follows.

- (a) Special Circumstances. Because of the special circumstances applicable to the property, including exceptional narrowness, shallowness or shape of the specific piece of property; exceptional topographic conditions; extraordinary and exceptional situation or condition of the property and/or location of surroundings; the strict application of the regulation results in exceptional and undue hardships upon the owner of the property.

Staff Comment: Staff has found no special circumstances applicable to the property, as demonstrated in this report. The parcel has no exceptional narrowness, shallowness or shape of the specific piece of property; no exceptional topographic conditions; no extraordinary and exceptional situation or condition of the property and/or location of surroundings. The strict application of the regulation does not result in exceptional and undue hardships upon the owner of the property, as the owner is not being deprived of developing the property in the same manner as surrounding properties.

- (b) No Detriment. The relief will not create a substantial detriment to the public good, substantially impair affected natural resources or impair the intent and purpose of the Development Code or applicable policies under which the variance is granted.

Staff Comment: As the immediate neighbor provided a letter of support, the relief would not create a substantial detriment to the immediate neighbor or substantially impair affected natural resources. However, the wall height does

not conform to the requirements of the development code absent extraordinary circumstances; justifying a variance may impair the intent and purpose of the development code's restrictions governing fence and wall heights.

- (c) No Special Privileges. The granting of the variance will not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and the identical regulatory zone in which the property is situated.

Staff Comment: Approving this variance would create a special privilege by allowing a wall to exceed the height limits established by Washoe County Code. Granting this request would provide an advantage not available to other properties in the same vicinity and regulatory zone and therefore would violate this finding.

- (d) Use Authorized. The variance will not authorize a use or activity which is not otherwise expressly authorized by the regulation governing the parcel of property.

Staff Comment: The use of a wall is authorized, though the wall height exceeds maximum height requirements.

- (e) Effect on a Military Installation. Issuance of the permit will not have a detrimental effect on the location, purpose or mission of the military installation.

Staff Comment: There are no military installations within the required noticing area; therefore, the board is not required to make this finding.

Recommendation

After a thorough analysis and review, Variance Case Number WPVAR25-0011 is being recommended for denial. Staff offers the following motion for the Board's consideration.

Motion

I move that, after giving reasoned consideration to the information contained in the staff report and information received during the public hearing, the Washoe County Board of Adjustment deny Variance Case Number WPVAR25-0011 for the 515 Rhodes Wall Height Variance, having been unable to make all four required findings in accordance with Washoe County Development Code Section 110.804.25:

- (a) Special Circumstances. Because of the special circumstances applicable to the property, including exceptional narrowness, shallowness or shape of the specific piece of property; exceptional topographic conditions; extraordinary and exceptional situation or condition of the property and/or location of surroundings; the strict application of the regulation results in exceptional and undue hardships upon the owner of the property;
- (b) No Detriment. The relief will not create a substantial detriment to the public good, substantially impair affected natural resources or impair the intent and purpose of the Development Code or applicable policies under which the variance is granted;

- (c) No Special Privileges. The granting of the variance will not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and the identical regulatory zone in which the property is situated;
- (d) Use Authorized. The variance will not authorize a use or activity which is not otherwise expressly authorized by the regulation governing the parcel of property;
- (e) Effect on a Military Installation. Issuance of the permit will not have a detrimental effect on the location, purpose or mission of the military installation.

Appeal Process

Board of Adjustment action will be effective 10 calendar days after the written decision is filed with the Secretary to the Board of Adjustment and mailed to the applicant, unless the action is appealed to the Washoe County Board of County Commissioners, in which case the outcome of the appeal shall be determined by the Washoe County Board of County Commissioners. Any appeal must be filed in writing with the Planning and Building Division within 10 calendar days from the date the written decision is filed with the Secretary to the Board of Adjustment and mailed to the applicant.

Applicant: Judy Coulter

Representatives: Garrett Gordon



Date: December 18, 2025

To: Jolene Bertetto, Planner
From: Janelle Thomas, P.E., Senior Licensed Engineer
Robert Wimer, P.E., Licensed Engineer

Re: Variance Case WPVAR25-0011 Rhodes Wall Height Variance
APN 017-400-19

GENERAL PROJECT DISCUSSION

Washoe County Engineering and Capital Project staff have reviewed the above referenced application. The application, prepared by Garrett Gordon, is for a variance to approve a variance of the maximum wall height allowed to allow for a 15-foot-tall wall.

The Engineering and Capital Projects Division provides no recommendation for this variance case with no additional comments or conditions.



Date: December 17, 2025

To: Jolene Bertetto, Planner

From: Timber Weiss, P.E., Licensed Engineer

Re: Variance Case Number WPVAR25-0011 (Rhodes Wall Height Variance)

GENERAL PROJECT DISCUSSION

For hearing, discussion, and possible action to approve a variance to exceed the maximum wall height from 6' to 15' 8". The proposed variance is requested to bring into compliance an existing 95' long wall with a height of 15' 8". The wall was constructed in 2017 as a wind break for trees and to support wildlife, as mounted on the wall are several birdhouses. The wall is located along the property's east side.

The Community Services Department (CSD) recommends approval of this project with the following Water Rights conditions:

No water rights conditions for this variance.

From: [Donohue, Jen](#)
To: [Bertetto, Jolene](#)
Subject: WPPVAR25-0011, Rhodes Wall
Date: Sunday, December 28, 2025 8:33:20 PM

Greetings Jolene,
TMFPD has no comments/conditions for the above identified case.

Thank you.

Jen Donohue

Contract Fire Plans Examiner

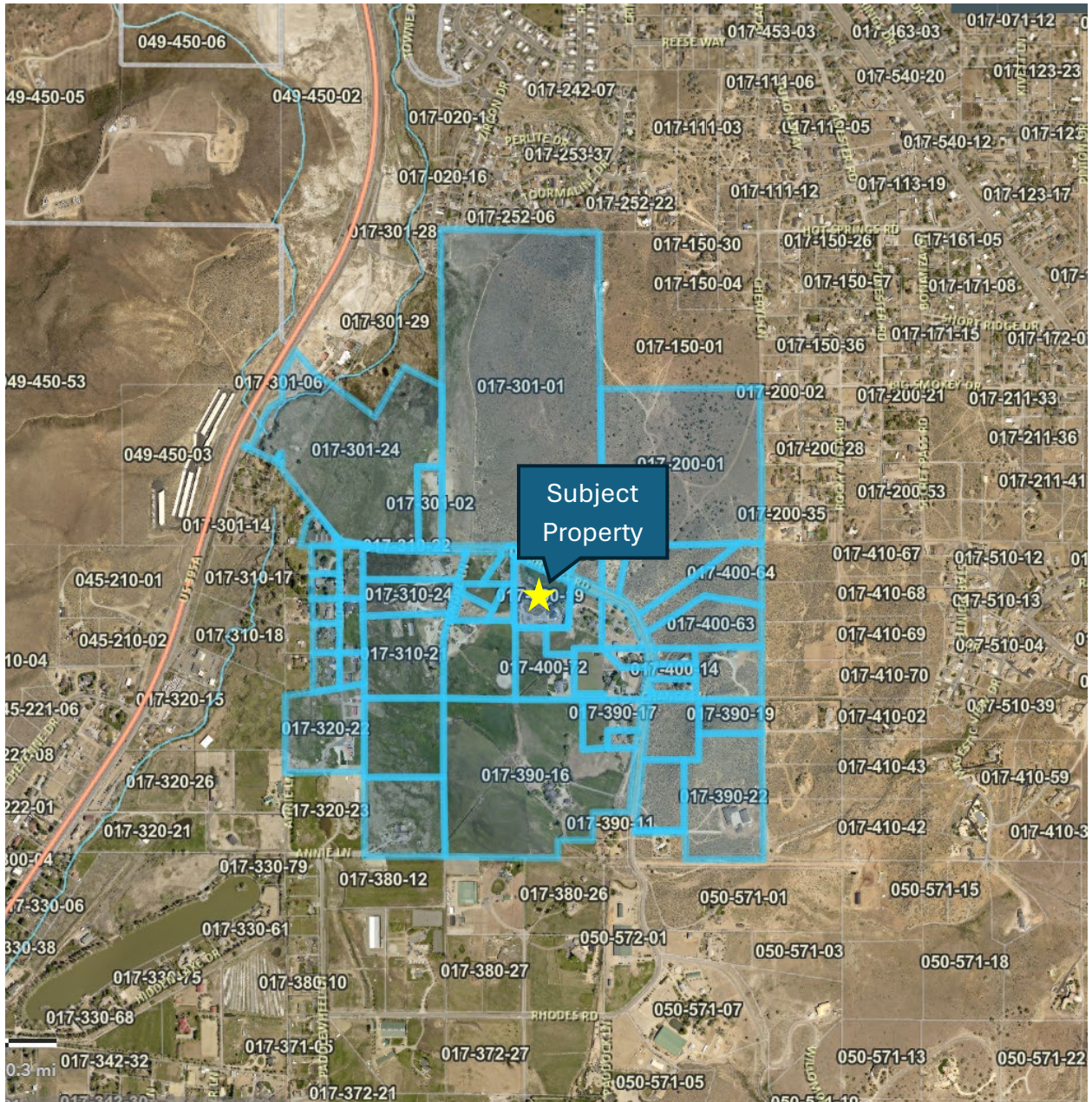
Truckee Meadows Fire & Rescue

jdonohue@tmfpd.us | Cell: 775.447-5780

3663 Barron Way, Reno, NV 89511

Public Notice

Pursuant to Washoe County Code Section 110.804.20, public notification consists of notification by mail of at least 30 separate property owners within a minimum 500-foot radius of the subject property. Notification for this application was sent to 33 property owners within a 1500-foot radius.



Washoe County Development Application

Your entire application is a public record. If you have a concern about releasing personal information, please contact Planning and Building staff at 775.328.6100.

Project Information		Staff Assigned Case No.: _____	
Project Name: Wildlife Preservation Wall Variance			
Project Description: On behalf of RED DOG TRUST, represented by trustees Curtis and Judy Coulter, the Applicants in this matter, we hereby submit the enclosed application for a variance to exceed the maximum wall height allowed under Washoe County Development Code § 110.406.50(a), and thereby resolve Administrative Enforcement Violation Case Number: WVIO-PLA25-0202. The variance requested here will allow for the existing Wildlife Preservation Wall located on parcel 017-400-19 to satisfy WCDC requirements.			
Project Address: 515 Rhodes Rd Washoe County, NV 89521			
Project Area (acres or square feet): 95"-1'			
Project Location (with point of reference to major cross streets AND area locator):			
Rhodes Rd and Ox-Yoke Ln			
Assessor's Parcel No.(s):	Parcel Acreage:	Assessor's Parcel No.(s):	Parcel Acreage:
017-400-19	5.03		
Indicate any previous Washoe County approvals associated with this application:			
Case No.(s). N/A			
Applicant Information (attach additional sheets if necessary)			
Property Owner:		Professional Consultant:	
Name: Red Dog Trust		Name: Garrett Gordon	
Address: [REDACTED]		Address: [REDACTED]	
Zip: 89511		Zip: 89501	
Phone:	Fax:	Phone: [REDACTED]	Fax:
Email:		Email: [REDACTED]	
Cell:	Other:	Cell:	Other:
Contact Person: Judy Coulter		Contact Person: Garrett Gordon	
Applicant/Developer:		Other Persons to be Contacted:	
Name: Curtis and Judith L. Coulter		Name:	
Address: [REDACTED]		Address:	
Zip: 89521		Zip:	
Phone:	Fax:	Phone:	Fax:
Email: [REDACTED]		Email:	
Cell:	Other:	Cell:	Other:
Contact Person: Judy Coulter		Contact Person:	
For Office Use Only			
Date Received:	Initial:	Planning Area:	
County Commission District:		Master Plan Designation(s):	
CAB(s):		Regulatory Zoning(s):	

womblebonddickinson.com

Garrett D. Gordon
Partner
Admitted in Nevada
Direct Dial: [REDACTED]
Direct Fax: [REDACTED]
E-mail: Garrett.Gordon@wbd-us.com

December 8, 2025

Community Services Department
Planning and Building
1001 E. Ninth St., Bldg. A
Reno, NV 89512-2845



Womble Bond Dickinson (US) LLP
One East Liberty Street
Suite 300
Reno, NV 89501-2128

**RE: WILDLIFE PRESERVATION WALL
VARIANCE SUPPLEMENTAL INFORMATION**

To Whom It May Concern:

On behalf of RED DOG TRUST, represented by trustees Curtis and Judy Coulter, the Applicants in this matter (“Applicants”), we hereby submit the enclosed application for a variance to exceed the maximum wall height allowed under Washoe County Development Code (“WCDC”) § 110.406.50(a), and thereby resolve Administrative Enforcement Violation Case Number: WVIO-PLA25-0202.¹ The variance requested here will allow for the existing Wildlife Preservation Wall (“Wall”) located on parcel 017-400-19 (the “Property”) to satisfy WCDC requirements.

This variance application applies to an existing structure which has been in place for over eight (8) years. The Applicants have put forth a good faith effort provide all materials requested in the application. In the event the Community Services Department needs additional information, material, or documents to review the application in full, the Applicants will provide all materials to the best of their ability.

VARIANCE SUPPLEMENTAL INFORMATION

1. *What provisions of the Development Code (e.g., front yard setback, height, etc.) must be waived or varied to permit your request?*

Response: The variance will waive WCDC § 110.406.50(a), limiting the maximum height for fences, walls or perimeter planting of the residential property to six (6) feet.

2. *What are the topographic conditions, extraordinary or exceptional circumstances, shape of the property or location of surroundings that are unique to your property and, therefore, prevent you from complying with the Development Code requirements?*

¹ **Exhibit 1.**

Womble Bond Dickinson (US) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see www.womblebonddickinson.com/us/legal-notice for further details.



Response: Due to the unique location of the property, extraordinary circumstances are at play. It is imperative, the Wall be allowed to stand so it may continue to cultivate and protect the thriving wildlife population, which depends on the Wall and arboretum for shelter.

The Property was previously home to one of the largest trees in the State of Nevada, a Fremont Cottonwood standing at 105 feet.² Unfortunately, in 2017, the tree began to split apart, and the Applicants, on the advice of an arborist, were forced to remove the tree to prevent harm to surrounding properties. The tree was dated at over 700 years old and provided shelter for wildlife. The Applicants felt a responsibility to the community to replace the tree and mitigate the loss of shelter for the frequenting wildlife population.

The Applicants embarked on an effort to create an arboretum by planting substantial new trees.³ This effort led to a significant increase in the migratory bird population visiting the area. To protect and cultivate the local wildlife, the Applicants built the existing Wall to shield the maturing arboretum from high winds and other environmental hazards and protect the migratory bird population which takes refuge in the area. Additionally, the Applicants commissioned the creation of various birdhouses which are mounted on the Wall to provide additional shelter for the migratory birds. The Applicants' mitigation efforts were successful, and the arboretum supports the nesting of Great Horn Owls, Red Tail Hawks, Monarch Butterflies, and the local Finch population.

The Property is in a unique area surrounded by local wildlife and the Applicants made a concerted effort to mitigate loss of natural resources and cultivate the migratory bird population, which squarely aligns with conservation efforts outlined in the Envision Washoe 2040 Master Plan, highlighting protection efforts for “*key wildlife* and fishery habitats; habitats of threatened, endangered, or rare species; *key migration routes*; and areas important for scientific study.” Envision Washoe 2040 Master Plan (“Master Plan”) at 45 (emphasis added).

Therefore, the Applicants are prevented from complying with the Development Code requirements, as to do so, would result in harm to the local migratory bird population in direct contravention of Master Plan goals.

3. *What steps will be taken to prevent substantial negative impacts (e.g., blocking views, reducing privacy, decreasing pedestrian or traffic safety, etc.) to other properties or uses in the area?*

Response: The Wall has been in place since late 2017, and over (8) years have passed without any incident, issue, or complaint. The Wall is entirely located within the Applicants' property line and has no impact on pedestrian safety or traffic safety. Finally, the Wall does not impact views, including the views of residents nearest the instillation. To the contrary, as a result of the Applicants'

² The Nevada Division of Forestry recognized the Fremont Cottonwood located on the Property as the “Nevada State Champion” on December 14, 2015, and listed the tree of the Nevada Big Tree Register as part of the Big Tree Program. Nev. Div. of Forestry & Fire Protection, *Nevada Big Tree Register* (2015), https://forestry.nv.gov/uploads/missions/20210712_amt_2015_nevada_big_tree_register.pdf.

³ **Exhibit 2**, Landscaping Plan.



efforts, those in the local area have increased views of local wildlife including Great Horn Owls, Red Tail Hawks, Monarch Butterflies, and the local Finches which frequent the area because of the instillation.⁴

4. *How will this variance enhance the scenic or environmental character of the neighborhood (e.g., eliminate encroachment onto slopes or wetlands, provide enclosed parking, eliminate clutter in view of neighbors, etc.)?*

Response: The variance enhances the scenic and environmental character of the neighborhood as the arboretum supports the nesting of migratory birds—which are enjoyed by all. Further, the arboretum developed by the Applicants is open to UNR’s Master Gardener tour and is frequently visited and enjoyed by locals. Additionally, the Wall eliminates clutter in view of neighbors and increases the ability to view the scenery in a streamlined fashion without the distraction of neighboring backyards. Finally, the Wall provides protection to the Property and neighboring properties from high winds that are common in the area.

5. *What enjoyment or use of your property would be denied to you that is common to other properties in your neighborhood?*

Response: The Property is unique as it is located in an area surrounded by natural habitats, and in the path of migratory bird species. When the Applicants came into possession of the Property, a large Fremont Cottonwood Tree stood on the Property and provided a home for many local wildlife species. When it became clear it was no longer safe for the tree to exist, the Applicants made a concerted effort to mitigate any impact to the wildlife that existed and continues to exist on the Property. Without the Wall, birds and other wildlife would no longer have space or shelter in the area, and that use, and enjoyment of the Property would be lost.

6. *Are there any restrictive covenants, recorded conditions or deed restrictions (CC&Rs) that apply to the area subject to the variance request?*

Response: There are no relevant restrictive covenants, recorded conditions or deed restrictions (CC&Rs) that apply to the area subject to the variance request.

7. *How is your current water provided?*

Response: Water is provided to the Property via well.

8. *How is your current sewer provided?*

Response: Sewer is provided to the Property via septic tank.

⁴ Notably, the neighbor to the west of the Property—nearest the Wall—Richard Mahoney, does not object to the Wall. See **Exhibit 3**.



For the reasons stated herein, the Wildlife Preservation Wall meets or exceeds all variance requirements and findings under WCDC. The Applicants therefore respectfully requests that the County approve the variance and resolve Case Number: WVIO-PLA25-0202.

Please do not hesitate to contact this office at [REDACTED] if we can provide any additional information.

Sincerely,

Garrett Gordon

Garrett Gordon
Womble Bond Dickinson (US) LLP

Exhibit 1



WASHOE COUNTY
COMMUNITY SERVICES DEPARTMENT
Planning and Building Division
Code Enforcement

ADMINISTRATIVE PENALTY NOTICE
****FIRST PENALTY****

November 18, 2025

RED DOG TRUST
515 RHODES ROAD
RENO, NV 89521

Case Number: WVIO-PLA25-0202
Subject Property: 515 RHODES ROAD, WASHOE COUNTY, NV 89521
Parcel Number: 017-400-19

Penalty Amount: **\$100**
Comply by: 12/21/2025
Payment Due by: 12/21/2025

Dear Respondent,

An inspection and an Administrative Enforcement Warning issued on 10/14/2025 revealed the violations noted below on the subject property. Washoe County Code Section 125.160(4) provides for issuance of an Administrative Penalty when violations noted on the Administrative Enforcement Warning are not corrected. This Administrative Penalty Notice is not a criminal proceeding.

The property was inspected on 11/18/2025 and remains in violation of the County Codes cited below. **You are hereby charged an administrative penalty of \$100.** Payment of the administrative penalty does not release you from correcting the code violation that currently exists on the subject property.

A 50% discount will be applied toward your penalty amount if paid on or before the payment due date listed above. Washoe County will accept one-half of the administrative penalty amount as payment in full if received by the payment due date shown on this notice. If an appeal is filed before the payment due date or if you pay the penalty after the payment due date, no reduction of the penalty is available. After the payment due date, any unpaid penalties will be turned over to the Washoe County Collections Office. A County Code required \$50 collections fee will be added to the penalty and you may also be subject to additional fees, interest and all collection remedies allowed by law. All penalties and fees assessed are cumulative. Each and every instance the code violation exists constitutes a separate and distinct offense. **County Code Violations must be corrected or additional penalties may be assessed without future warnings being issued. This notice of violation may be recorded with the Washoe County Recorder's Office if the violation is not corrected. In addition, pursuant to WCC 125.190, you are hereby notified that any approvals for applications, renewals of business licenses, and any land or structure use permits, building permits, or grading permits may be withheld until the violation(s) is corrected.**

Memo to: **RED DOG TRUST**
Subject: Administrative Penalty
Date: 11/18/2025
Page: 2

The code violation found on the property and the action you must take to correct the situation is:

VIOLATION:

WCC section 110.406.50(a) – Fences, Walls or Perimeter Planting: Residential Use Types.

The maximum height for fences, walls or perimeter planting is limited to four-and-one-half (4.5) feet in the required front yard setback except as noted by Section 110.406.30, Front Yards. **The maximum height for fences, walls or perimeter planting for the remainder of the residential property is six (6) feet.** Where two (2) or more of a property's frontages constitute front yards on a corner lot, one (1) of the yards shall be deemed to be the main entrance and all other yards with street frontage shall be considered modified side yards where fences, walls or perimeter planting can have a maximum height of six (6) feet as long as such fences, walls or perimeter planting are located at least ten (10) feet from the modified side yard property line. Barbed wire or razor wire livestock fencing in front yards is allowed only on lots with a size

CORRECTIVE ACTION:

WCC section 110.406.50(a) – Adjust the maximum fence height to six (6) feet outside the front yard setback.

RIGHTS OF APPEAL: You have a right to appeal this notice as described on the **Right to Appeal instructions attached to this notice.** Failure to respond to this notice by **12/21/2025** all be deemed an admission of liability and a waiver of any right to an administrative hearing.



Brian Farmer
Code Enforcement Officer II
bfarmer@washoecounty.gov
(775) 328-2312



Memo to: **RED DOG TRUST**
Subject: Administrative Penalty
Date: 11/18/2025
Page: 3

RIGHT TO APPEAL ADMINISTRATIVE PENALTY NOTICE

You may appeal this Administrative Penalty Notice by requesting an administrative hearing.

To request an administrative hearing, contact the Administrative Hearing Office located at Reno Justice Court by email at aho@washoecounty.gov, or by phone at (775) 328 – 2001 or (775) 325 – 6500. You will need to provide a copy of this Administrative Penalty Notice to the Hearing Office.

You must file your appeal on or before the appeal date stated in your Administrative Penalty Notice.

Fees and Costs: The fee to request an administrative hearing is \$50.00. This fee must be paid if you are found in violation of County Codes at the conclusion of the appeal hearing. The hearing officer may also impose additional administrative penalties and/or administrative action fees. Any outstanding penalties and fees must be paid at the conclusion of the appeal hearing.

Hearing Officer and Hearing Date: An administrative hearing officer will be assigned to your case by the Washoe County Administrative Hearing Office. The Administrative Hearing Office will notify you of your hearing date. The administrative hearing officer will issue an Administrative Order at the conclusion of your appeal hearing.

Impact on this Administrative Penalty Notice: Any deadlines, actions, and/or remedies included in this Administrative Penalty Notice will be placed on hold until your appeal is concluded.

Contact Information:

Administrative Hearing Office
(Located at Reno Justice Court)
1 S. Sierra St.,
Reno, NV 89501
Administrative Hearing Office: (775) 328 – 2001
Reno Justice Court: (775) 325 – 6500
aho@washoecounty.gov

Steps to File Your Appeal:

1. Contact the Administrative Hearing Office by email and/or phone on or before the appeal date shown on your Administrative Penalty Notice.
2. Email a copy of this Administrative Penalty Notice to the Administrative Hearing Office.

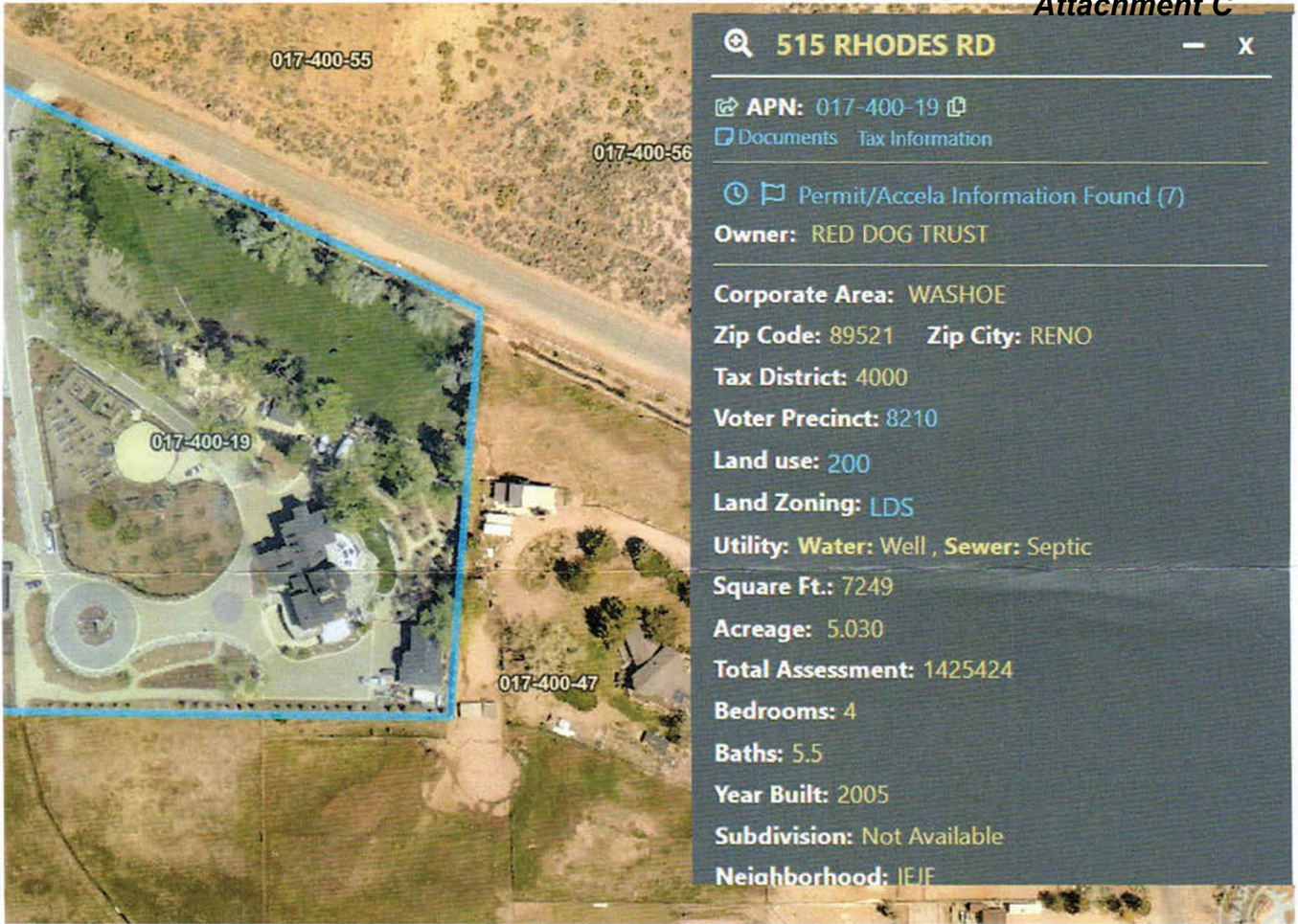


Exhibit 2

LANDSCAPE MASTER PLAN
For the Gentlemen's Ranch
 515 Rhodes Road - Reno NV 89521

Verdant
 LANDSCAPE ARCHITECTURE, LTD.
 2500 W. Flamingo Ave., Suite 100
 Las Vegas, NV 89119
 (702) 735-1234
 info@verdantlandscape.com

- LEGEND**
- Large Evergreen Tree
 - Small Evergreen Tree
 - Large Deciduous Tree
 - Large Shrub
 - Evergreen Shrub
 - Deciduous Shrub
 - Perennials
 - Ornamental Grasses
 - Lawns/Pavers
 - Buildings

LANDSCAPE NARRATIVE

This functional gentleman's ranch in Shoshone features an arboret, large horse pasture, extensive production area and small farm animals. Central to the site is the magnificent residence remodelled in a tasteful style.

The landscape plan complements the site with a new, forward driveway that includes a circle and entry plaza lined by a series of colorful and drought-tolerant planting areas.

To simplify the property entry, two planters flank the new entry drive. In a series of lawn and gravel sections, the driveway is bordered by a concrete edge, trellis and a 4' walkway to the East. After passing the site, an allee of trees takes visitors on a colorful journey along the walkway. These entry plantings provide shade and privacy to the production gardens to a large driveway side. Here, a semi-circular planting of flowering plants greets one past the ellipse sign. A small concrete fountain frames the view to the beautiful residence with its welcome plaza.

Behind the residence, an arborway of trees important to the site and screening, providing a lush environment to enjoy the colorful plantings. Access is provided to all functional areas and a secondary driveway allows residents to leave the property from their main garage.

This serene landscape provides a functional and aesthetically pleasing touch to this impressive gentleman's ranch property on Rhodes Road.

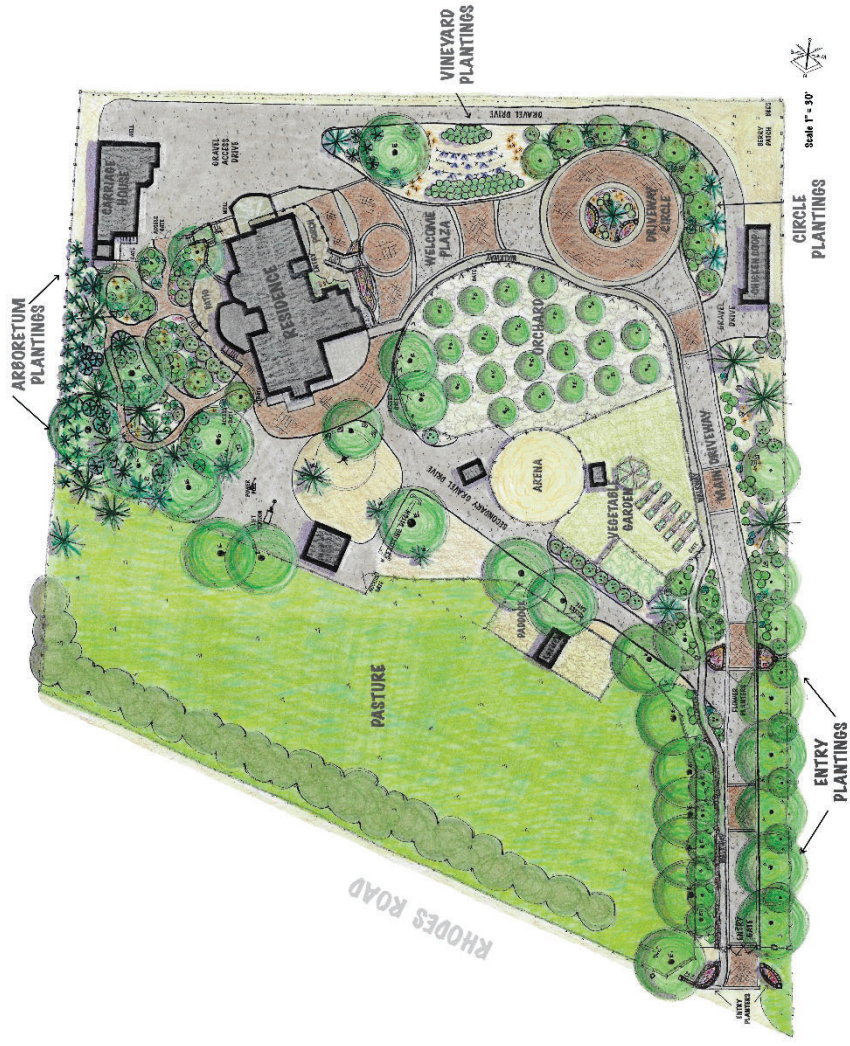


Exhibit 3

From: Dick Mahoney <dick.mahoney@gmail.com>
Sent: Monday, December 8, 2025 2:09 PM
To: Code-Enforcement@washoecounty.gov <Code-Enforcement@washoecounty.gov>
Cc: Judy Coulter <judy@csa2b.com>
Subject: Information on request for variance

Dear Washoe County:
I own the property at 625 Rhodes Road. My neighbors to the west are Curtis and Judy Coulter at 515 Rhodes Road. they have built a habitat wall for migratory and resident birds.

I have no objection to the habitat structure and consent to a special use variance being granted for its continued existence

If you have any questions, you may call me at 805-217-3939

Thank you,

Richard Mahoney

THE NW 1/4 OF THE NW 1/4 OF SECTION 3 &
A PORTION OF THE NE 1/4 OF THE NE 1/4 OF SECTION 4
T17N - R20E

Assessor's Map Number

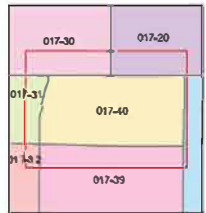
017-40

STATE OF NEVADA
WASHOE COUNTY
ASSESSOR'S OFFICE

1001 East Ninth Street, Building D
Reno, Nevada 89512
(775) 328-2231



1 inch = 200 feet

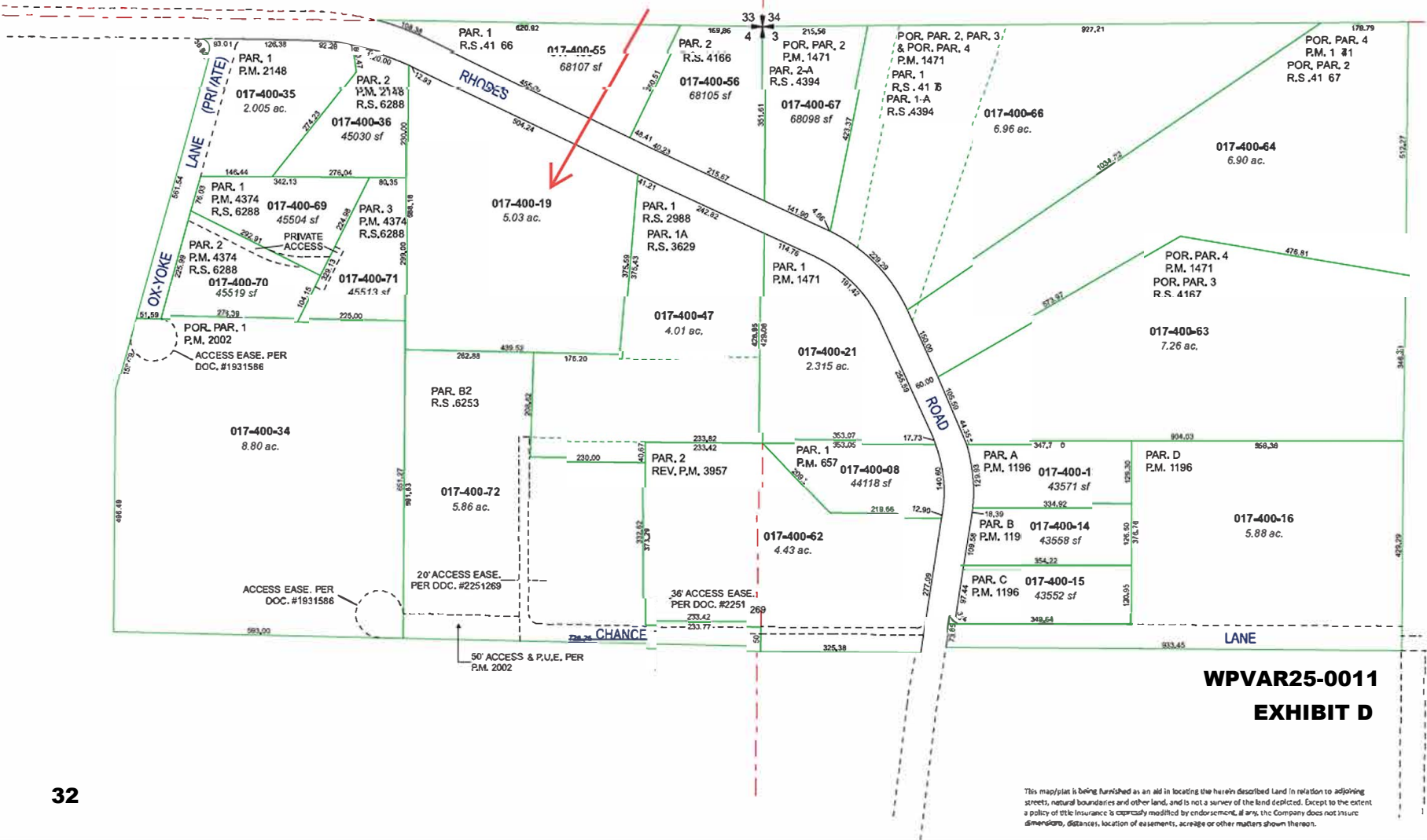


created by: TWT 7/9/2014

updated: JKF 5/13/21 JKF 9/28/22

area previously shown on map(s):

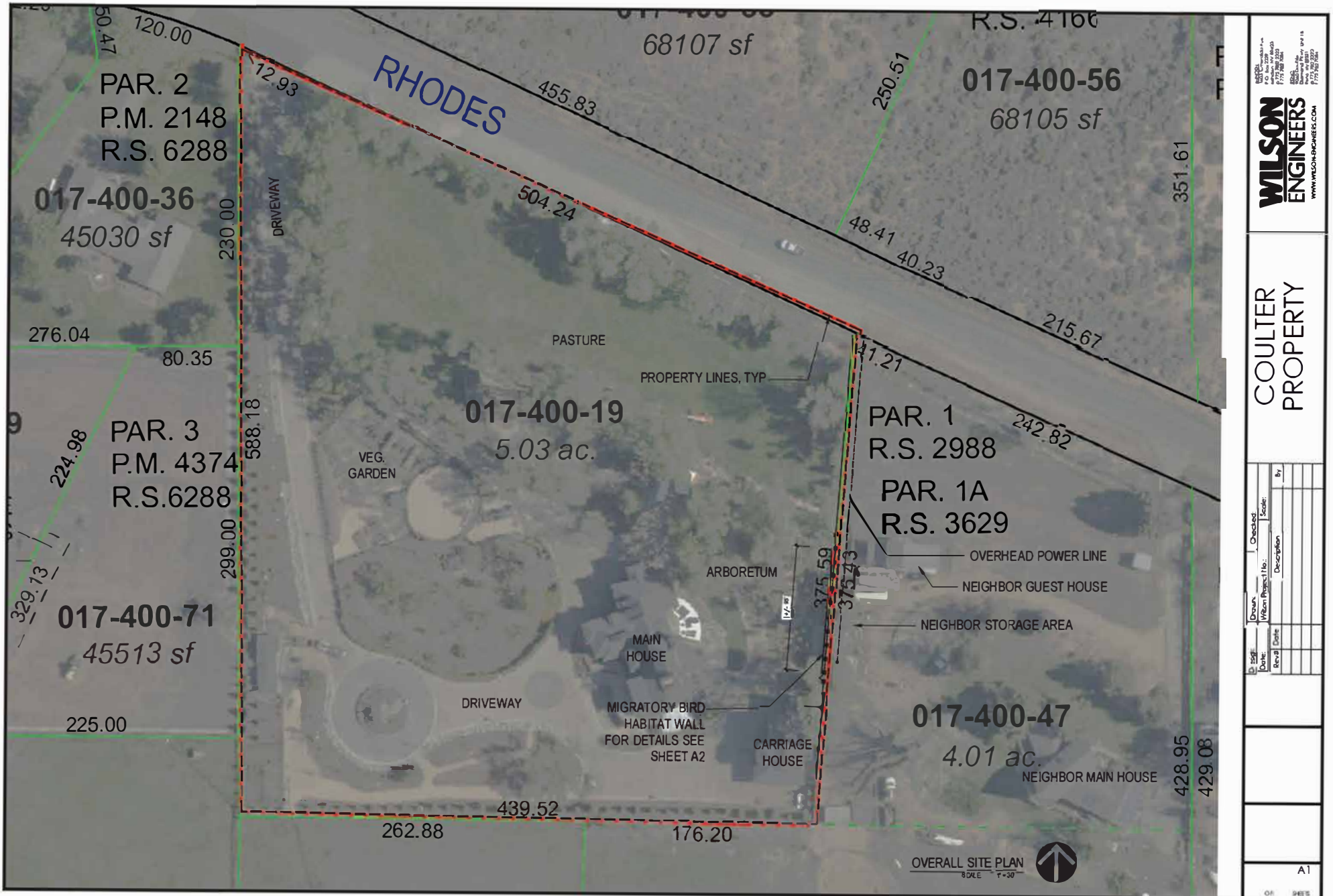
NOTE: This map was prepared for the use of the Washoe County Assessor for assessment and illustrative purposes only. It does not represent a survey of the premises. No liability is assumed as to the sufficiency or accuracy of the data delineated hereon.



WPVAR25-0011
EXHIBIT D

This map/plot is being furnished as an aid in locating the herein described land in relation to adjoining streets, natural boundaries and other land, and is not a survey of the land depicted. Except to the extent a policy of title insurance is expressly modified by endorsement, if any, the Company does not insure dimensions, distances, location of easements, acreage or other matters shown thereon.

Site Plan



COULTER
PROPERTY

Drawn	Checked	Scale
Wilson		
Project No.		
Date	By	Description

DATE	BY	DESCRIPTION

A1

OF SHEETS

Building Elevations

Site Photos









