BRIEF OF APPELLANT CITIZENS FOR SPANISH SPRINGS

Appeal from Planning Commission Recommendation to Approve Application WDCA24-0004: Housing Affordability Package 2.5a

Board of County Commissioners Meeting
November 19, 2024

Relief Sought

Appellant Citizens for Spanish Springs requests that the Board of County Commissioners grant this appeal, reverse the Planning Commission's decision to recommend approval and deny application WDCA24-0004 (Housing Affordability Package 2.5a).

Standing

The County staff objects to the standing of Citizens for Spanish Springs, i.e., the legal right of Citizens for Spanish Springs to bring this appeal. This procedural move is staff's attempt to shut down this appeal without allowing the Board of County Commissioners to decide the appeal on its merits.

The argument by staff is that the members of Citizens for Spanish Springs are not affected by the Code amendments proposed in Housing Affordability Package 2.5a and thus Citizens for Spanish Springs has no standing. The residents are affected, however. As proof, the County held community meetings on Housing Affordability Package 2.5a on June 24, June 26 and July 1, 2024. The meetings

were scheduled to take place from 5:00-6:00 pm, but due to public interest the meetings ended at approximately 6:30 pm. The June 24 meeting was attended via Zoom by 71 people and in person by 14 more. Two days later, 55 people attended the June 26 meeting via Zoom. Five days later, approximately 41 people attended the third meeting in person.

The holding of community meetings with residents is an admission by the County that residents of the County have a stake in Development Code amendments. The number of attendees at the community meetings is evidence that residents strongly believe they will be adversely affected by the County's plan to lay down the red carpet for developers to build duplexes, triples, four-plexes, cottage courts and bunk houses in single-family neighborhoods as a matter of right and without notice to any neighbors.

Staff complains nonetheless that Citizens for Spanish Springs allegedly lacks standing because it is only comprised of "unknown and unnamed individuals" who "claim" to own property. *Staff Report, pp. 5 & 6 of 13*. The appellant is not unnamed or unknown individuals. The appellant is Citizens for Spanish Springs. In *Nat'l Ass'n of Mut. Ins. Cos. v. State Dep't of Bus. & Indus.*, 524 P.3d 470, 478 (Nev. 2023), the Nevada Supreme Court affirmed that a voluntary-member association may establish standing by showing injury to its members, even though the association itself suffered no direct injury. This is known as "representational

standing." The three-part test for representational standing is "(a) its members would otherwise have standing to sue in their own right; (b) the interests it seeks to protect are germane to the organization's purpose; and (c) neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit." *Id*.

(a) Members' standing to appeal in their own right

NRS 278.3195(1) provides that an "aggrieved" person has standing to appeal. WCC 110.910.02 defines "aggrieved person" as a person or entity who has suffered a substantial grievance in the form of the "denial of or substantial injury to a personal or property right."

In the instant appeal, the aggrieved appellant is an association representing its members. In the federal case law precedents from which *Nat'l Ass'n of Mut. Ins. Cos.* is drawn, the Ninth Circuit held in *Nat'l Council of La Raza v. Cegavske*, 800 F.3d 1032, 1041 (9th Cir. 2015) that the court was not convinced that an injured member of an organization must always be specifically identified in order to establish standing for the organization. The Nevada Supreme Court cited to *Nat'l Council* and held that representational standing is established when an organization provides a list including names of members.

Citizens for Spanish Springs has at least 96 members. A list is attached. The list gives the residence addresses where the members own property. Also attached

are copies of member sign-in sheets and signed petitions attesting to members' opposition to the County's efforts to amend the Development Code.

Rather than having 96 individuals hire 96 attorneys to advocate for and to defend their personal and property rights, residents banded together under the name Citizens for Spanish Springs to have one lawyer represent their mutual interest in stopping bad planning that adversely effects the residents' personal and property rights. The formation of the group is significant in the eyes of the law. In *Nat'l Ass'n of Mut. Ins. Co.* the court held that the fact that people asked for an organization to intervene and advocate for their rights is itself evidence of member injury. *Id.* at 479.

Attached is a map indicating the locations of residences of members of Citizens for Spanish Springs. The map shows that the members live in or in close proximity to regulatory zones where "affordable"/"attainable" housing types would be built. If the Code amendments proposed in Housing Affordability Package 2.5a are adopted, these "middle housing" types would be built in regulatory zones where they previously could not be built in the absence of a special use permit. The current requirement of a special use permit protects the residents by giving them notice and an opportunity to be heard.

The staff on the other hand is fond of the concept of "streamlining", which means eliminating protections for existing residents in the current Code. The

members of Citizens for Spanish Springs are aggrieved and would have standing in their own right because the amendments proposed by Housing Affordability

Package 2.5a would eliminate their personal and property right to be heard in opposition as to any proposed apartment project.

The members of Citizens for Spanish Springs are aggrieved and would have standing in their own right because Spanish Springs valley has limited infrastructure upon which the members depend and the amendments at issue would allow accelerated urbanization of the valley and overtaxing of the valley's available water, sewer, streets and roads.

The members are aggrieved and would have standing in their own right because they own and reside on property either in, or in close proximity to, regulatory zones that the County is attempting to transform into multi-family rental properties, which adversely affects the value, use and enjoyment of the members' properties.

The members are aggrieved and would have standing in their own right because they built or purchased their homes in reliance upon, and as protected by, existing regulatory zones in the Development Code, and there is no substantial or material change in circumstances to justify amendments to allow apartments to be built as of right in suburban residential and neighborhood commercial zones, instead of only with a special use permit, as provided in the current code.

In Citizens for Cold Springs v. City of Reno, 125 Nev. 625, 218 P.3d 847 (2009), citizens, taxpayers, residents, and property owners in Cold Springs challenged Reno's annexation of Cold Springs on grounds that the urbanization and development planned by Reno¹ would adversely affect their rural community and its limited water supplies and infrastructure. Reno tried and failed to get the residents' case dismissed on standing grounds. The court held that Nevada statute allows for citizens to challenge annexations based on both current and reasonably ascertainable future adverse effects. Id. at 632, 218 P.3d at 851. The court pointed out that in its prior decision in Hantges v. City of Henderson, 121 Nev. 319, 322-23, 113 P.3d 848, 850 (2005), the court had determined that citizens who were not property owners of the subject land had standing to challenge an agency's

¹ In the companion case of *City of Reno v. Citizens for Cold Springs*, 126 Nev 263, 266, 236 P3d 10, 12 (2010), the court said: "Cold Springs is a predominately rural area located north of Reno. It is a closed hydrographic basin that traps water and sewer outflow within its confines. Because of the closed nature of Cold Springs' water services and infrastructure, there are limited water supplies and sewage disposal available to its citizens. In 2005, the City passed a zoning ordinance that annexed approximately 6,800 acres of undeveloped land in Cold Springs. The City annexed this land because developers proposed substantial urbanization in the area, including 13.5 million square feet of new commercial space and 6,860 new residential units." The *Citizens for Cold Spring* cases thus arose in a context that bears some similarity to the County's attempt to urbanize Spanish Springs today.

findings on a redevelopment plan. *Id.* The court had held in *Hantges* that Nevada statutes allowing challenges to land use decisions by a local governing body should be interpreted broadly to serve their protective purpose "consistent with our prior rulings that citizens have standing to challenge land-use decisions." *Id.* at 323, 113 P.3d at 850 (citing *City of Reno v. Goldwater*, 92 Nev. 698, 700, 558 P.2d 532, 533 (1976) (observing that the standing of taxpayers and residents living in close proximity to the subject land was "beyond question").

In Citizens for Cold Springs the court cited with approval the following cases on standing: Construction Ind. Ass'n, Sonoma Co. v. City of Petaluma, 522 F.2d 897, 903 (9th Cir. 1975) (holding that two landowners challenging a housing and zoning plan have standing to sue on their own behalf because they had "already suffered or are threatened with a direct injury"); Cowan v. Board of Com'rs of Fremont County, 143 Idaho 501, 148 P.3d 1247, 1255 (Idaho 2006) (holding that adjoining landowner had standing to challenge a proposed subdivision because when one alleges that his property might be adversely affected by a land-use decision, the nature of the harm, be it real or potential, is sufficient for standing purposes); Benton County v. Friends of Benton County, 294 Ore. 79, 653 P.2d 1249, 1257 (Or. 1982) (affirming a land-use agency's decision granting standing to a landowner and explaining that the inquiry as to adverse effect and the likelihood of injury is a factual determination, while noting that in that specific

instance, the likelihood of damage was remote but was not too remote for consideration); *Jenkins v. Swan*, 675 P.2d 1145, 1150 (Utah 1983) (holding that an allegation of adverse effect requires some "causal relationship alleged between the injury to the plaintiff, the governmental actions and the relief requested"). The holdings of these cases are consistent with standing being granted for Citizens for Spanish Springs in this appeal.

Accordingly, the members would have standing individually as aggrieved persons and Citizens for Spanish Springs satisfies the first prong of representational standing.

(b) Interests being protected are germane to the organization's purpose

In Nat'l Ass'n of Mut. Ins. Cos. the court held that the second element of representational standing -- the interests of the association are germane to its purpose -- is designed to assure that the association has a sufficient stake in the resolution of the dispute to provide vigorous advocacy. Citizens for Spanish Springs was formed to oppose Housing Affordability Package 2.5a and thus exists to advance the interests of residents who are its members. Citizens for Spanish Springs has provided vigorous advocacy by appearing before the Planning Commission and filing the instant appeal. Citizens for Spanish Springs will continue to provide vigorous advocacy by appearing on November 19, 2024 before the Board of County Commissioners.

(c) The claim asserted and the relief requested do not require the participation of individual members in the lawsuit.

Citizens for Spanish Springs is seeking the rejection of the Planning Commissions' findings and reversal of the recommendation for approval of Housing Affordability Package 2.5a. The court held in Nat'l Ass'n of Mut. Ins. Cos that individual participation is less significant in a declaratory judgment case where an association seeks declaratory relief for its members, rather than monetary damages, because declaratory relief is "properly resolved in a group context." Id., at 480. Declaratory relief actions do not require "tailored proof of how a regulation will impact each member." Id. Similarly, this appeal does not seek damages or other individual relief on behalf of any member. This appeal seeks relief that is "properly resolved in a group context" because it seeks reversal of a government action affecting everyone in Spanish Springs, or actually, everyone living in unincorporated Washoe County. This appeal is akin to a declaratory relief action rather than an action for damages. Accordingly, in line with the court's holding in Nat'l Ass'n of Mut. Ins. Cos., Citizens for Spanish Springs satisfies all three elements of representational standing.

Grounds for Reversal

On September 3, 2024, Citizens for Spanish Springs appeared through its counsel, with local residents, to speak in opposition to the proposed amendments to the Development Code in County-sponsored Housing Affordability Ability

Package 2.5a. As the hearing began, the chair announced that staff would be receiving extra time for its presentation. Before Citizens for Spanish Springs and residents rose to speak, the chair admonished them that they would have 180 seconds each, and no more, and to behave themselves or the chair would take appropriate action. The audience had been behaving appropriately and the lecture was uncalled for, but the incident highlights the difficulty of gaining a level playing field for this appeal.

A point stressed by staff during the hearing was that planning commissioners needed to make only one of four possible findings (i.e., agree with one of four possible justifications) for Housing Affordability Package 2.5a to be recommended for approval. For Commissioners Flick and Kennedy, even one finding was a bridge too far. They announced they could make none of the four findings.

Commissioner Pierce could make only one finding. Three commissioners —

Nelson, Owens and Barnes -- said they could make two findings. Only

Commissioner Lazzareschi said he could make all four findings. The outcome was a 5-2 vote recommending approval, though it was obvious the commissioners as a group had difficulty going along with the staff's argument that commissioners should have no problem making all four findings. Despite the divided Planning

Commission, in their Staff Report to this Board on this appeal, staff asserts that

they "strongly believe" that all four findings could be made. Staff Report, p. 7 of 13.

Respectfully, Citizens for Spanish Springs and its members strongly believe that none of the four findings could be made.

This Board does not need to make any findings of its own. In considering a final action on a Planning Commission recommendation, the Board of County Commissioners need only make part of the record this Board's rejection of the findings provided in the Planning Commission's final recommendation. This Board also can make other findings it may deem relevant, but there is no requirement to do so. *See* WCC 110.818.35.

Citizens for Spanish Springs differs with staff at a fundamental level. The staff characterizes Housing Affordability Package 2.5a as "reducing" "regulatory barriers" to housing. To the residents of Spanish Springs, the existing Code is not a "regulatory barrier." The existing Code protects their interests. It means that the rules that they followed when they purchased or built their homes in Spanish Springs will be followed by others in the future, as they should be.

Frankly, if this Board truly felt the existing Development Code was merely a "regulatory barrier", this Board would not have adopted the Code in the first place.

As Citizens for Spanish Springs views it, the staff is obsessed with its goal of urbanizing every part of Washoe County (with the exception of Lake Tahoe, of

course) in the name of "affordable"/"attainable" housing. This obsession overlooks the commitments of residents who bought homes and land in Spanish Springs in reasonable reliance on the expectation that they would be able to raise their families in a countrified setting of traditional single-family detached homes. Staff's obsession overlooks the protection to residents provided by the Code's current requirement that a special use permit must be obtained in most regulatory zones for apartment housing.

On September 3rd some but not all of the planning commissioners overlooked the personal and property rights of residents and made subjective "findings" that ignore the reality as to the effect of steering development in the valley into multi-family housing, aka "middle" housing. It is respectfully requested that this Board reject those findings for the following reasons:

1. The proposed amendments are inconsistent with the Master Plan

One of the problems with the "finding" by some planning commissioners that the Code amendments are "consistent" with Envision Washoe 2040 Master Plan is that this finding ignores elements of the Master Plan that contradict the finding. For example, large areas of Spanish Springs are in rural residential and suburban residential land use designations in the Master Plan. Many members of Citizens for Spanish Springs live in these areas. The plan states, at p. 57:

The intent of the Suburban Residential designation is to provide for a predominantly residential lifestyle with supporting mixed use nonresidential

and residential uses, including commercial, public and semi-public facilities; and parks and open space. A further goal of this group is to protect the stability of existing unincorporated neighborhoods and to encourage compatible smart growth development, while allowing diversity in lifestyle that is manifested in a variety of lot sizes, density, levels of mixed-use and land use patterns. Developments proposed within the Suburban Residential designation should promote the development of walkable, mixed-use communities that meet the daily needs of residents, balance jobs and housing, offer a high quality of life, reduce the need for automobile trips, encourage the utilization of public transit and result in the creation of distinctive and attractive communities that create a strong sense of place.

Citizens for Spanish Springs finds that allowing apartments to be built as a matter of right in, or in close proximity to, their rural residential or rural suburban neighborhoods conflicts with preserving "the stability of existing unincorporated neighborhoods." It also conflicts with "smart growth development." The amendments proposed by WDCA24-0004 therefore conflict with the Master Plan.

Significant areas of Spanish Spring are designated by the Master Plan as rural. As the attached map and lists show, a number of members of Citizens for Spanish Springs live in these areas. The policy of the Master Plan is to "maintain the rural character of communities in the Rural Area." *See* Master Plan, p. 61. This is exactly what Citizens for Spanish Springs is attempting to do on this appeal. WDCA04-0004 is inconsistent with the Master Plan because it does not attempt to maintain the character of the rural areas.

To the extent the Master Plan addresses different housing types to meet the asserted demand, there is a dearth of evidence that apartments that are built

pursuant to WDCA24-0004 would make even a small dent in the satisfying the alleged demand. Thus, it is inconsistent with good planning to propose that existing residents sacrifice their personal and property rights for no reasonable purpose.

2. The proposed amendments do not promote public health, safety, welfare and the purpose of the Development Code

The Development Code (Chapter 110 of Washoe County Code) is of course massive in size, covering hundreds of ordinances in many subject areas. It is therefore incredibly overbroad, vague and ambiguous – in fact, almost meaningless – for a planning commissioner to make a "finding" that a particular development is "consistent" with the Development Code.

With that in mind, Article 104 of Chapter 110, in WCC 110.104.00, states that the purpose of the various County bodies who enforce the Code, including this Board of County Commissioners, is to oversee a "system for ensuring that growth occurs in a responsible manner in order to protect the health, safety, and welfare of the County and its residents." Respectfully, in the view of Citizens for Spanish Springs, WDCA24-0004 is not an example of responsible growth, nor does it protect the health, safety and welfare of the residents. For the reasons previously given above, the health, safety and welfare of the members of Citizens for Spanish Springs is *not* protected in WDCA24-0004. The County's invitation to developers to build apartments rather than single-family detached homes in suburban

residential, neighborhood commercial, and other areas as a matter of right without a special use permit is not responsible growth. To be responsible growth, it must take into account the quality of life and the personal and property rights of existing residents, not merely those who the County is trying to attract to the "affordable"/"attainable" housing.

Notably, only one out of seven planning commissioners found WDCA24-0004 to be consistent with the Development Code. Six out of seven therefore concluded that the proposed amendments are not consistent with the Code.

3. The amendments are not justifiable as a "response to changed conditions"

The "changed conditions" between the Spanish Springs of a decade ago and the Spanish Springs of today relate to growth. The side-effects of growth in the valley have been typical of other areas experiencing rapid growth: issues with infrastructure, traffic, water, sewer, congestion and public services, to name a few. There is no reason to add fuel to the fire by encouraging developers to build multiunit housing under these conditions.

Regarding the staff's argument that the goal is "a more desirable utilization of land within the regulatory zones", the staff is simply substituting its subjective judgment as to what is desirable in place of the people who live there. Even assuming an "increased demand for more diverse and accessible housing options" as described by the Staff Report, that demand does not translate into a right to

demand that apartments be built in Spanish Springs to satisfy that demand. The indiscriminate application of these amendments to everywhere in Washoe County (except Tahoe) is not good planning; it is poor planning that displays a disregard for the personal and property rights of existing residents.

4. The amendments would cause adverse effects

Again, only one of seven commissioners found that there were allegedly "no adverse effects" in recommending approval of WDCA24-0004. It was clear to the rest of the commissioners that adverse effects will occur.

For example, apartments would appear in single-family suburban residential zones without any notice to existing residents. Residents would have no right even to object to apartments being built in their neighborhoods.

Families who came to Spanish Springs for a rural and semi-rural lifestyle, who bought their land and single-family detached homes and who invested their time and money to have a "sense of place" would be sold out in the name of "affordable"/"attainable" housing. Their property values and use and enjoyment of their homes and land will be adversely effected as well.

Summary

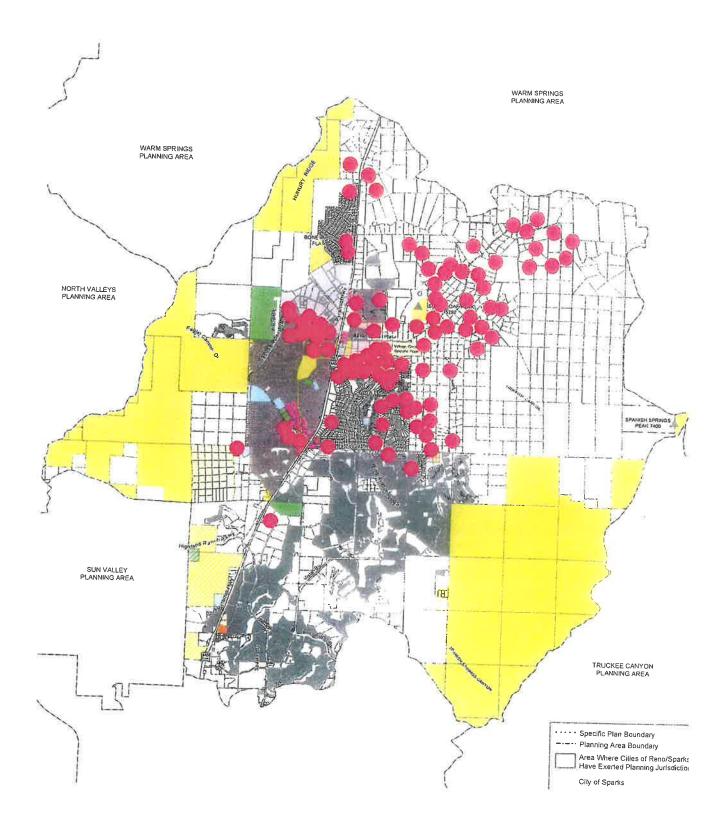
Pursuant to WCC 110.818.35, Citizens for Spanish Springs respectfully requests that this Board grant this appeal.

It is further requested that the Board reject the several findings made by some, but not all, members of the planning commission.

It is further requested that the Board reverse the Planning Commission recommendation for approval and that this Board deny application WDCA24-0004.

DATED: November 12, 2024 LAW OFFICES OF MARK WRAY

By <u>/s/ Mark Wray</u>
Attorney for CITIZENS FOR SPANISH SPRINGS



Names on Dotted Map Spanish Springs

Diana & Alan Loeffler - 11685 Paradise View Dr.

Donald Phillips Jr - 3009 Segre Ct

Ann Seder – 225 Hercules Dr

Marilyn Lawrence Leckbank - 5700 Winnemucca Ranch Rd

Michael & Kathi Sauers - 3085 Barranca Dr

David Koliha - 250 Quivera Lane

Lydia & Ron Miranda – 290 Saintsbury Ct

Jennifer Vaught - 3295 Genil Ct

Karl Sweder – 225 Hercules Dr

Dyanne Read - 650 Encanto Dr

Rob Holps - 5038 Dolores Dr

Thomas Nason - 1187 Rancho Mirage Dr

Meghan & Chris Westin – 670 Playa Place

Robert Russell - 7883 Jacinto Ave

Ken & Teresa Theiss - 177 Echaniz Ct

Mary Abrahamson – 1419 Laughing Chukar Lane

Terri Rondalcit - 751 Louden Ct

Dan Freshman - 603 Calle De La Plata

Dan Herman – 11275 Campo Rico Ln

Gail Russel - 7883 Jacinto Ave

Danya & Kevin MacDonald – 11925 Canyon Dawn Dr

Mitchell Volt - 11607 Hacienda Ridge Way

Frank Blazek - 810 Encanto Dr

Adam & Cindy Gilbert – 810 Encanto Dr

Nav Balwa – Calle De La Plata

Trish Swain – 15 N Desert Springs Cr

Erika Schreiber – 63 Marilyn Mae

Chris & Elizabeth Spezia – 9732 Pyramid

Tim Denning – 115 Carefree Dr

William Kaufmann - 8915 Benedict Dr

Mary Sheppard – 55 Wootton Downs Dr

Scott Peters – 560 Valle Verde

Jeff Holzhauer – 7892 Jacinto Ave

Bernie & Keenynn Allan – 1338 Weizen Dr Shantel Michell 4141 Black Hills Dr Dave & Heather Rials – 758 Snowdrop Ct Justin & Brittany Miller - 8495 Eaglenest Rd Dennis & Brittany Erickson - 7909 Navasota Ct Christi Johnson - 1450 Talon Ct Jim & Dawnee Olson – 325 Omni Dr. Sean Winewillel - 1267 Saron Dr Terry & Sandra Jennings - 40 Desert Peak Court Sarah Manghamn - 378 Omni Dr Matt Farrell - 30 Horse Springs Dr Ciara Goines = 1345 Lublin Dr Craig & Leslie Comstock – 7550 Shadow Lane Debra Wood – 5335 Santa Rosa Ave Lawrence Powers – 6700 Coyote Call Trail Richard Lew - 5655 Grass Valley Road Gail & Carl Whisman – 435 Alamosa Dr. Judith Gannoe - 327 Onmi Dr Nancy Rose – 326 Omni Dr Theresa Rose 329 Omni Dr Nancy Ellis – 219 Bartmess Kimberly & Dale Anelo – 11640 Eagle Peak Dr Mindy Rice - 2322 Ruddy Way Michael & Diane Craig - 421 Desert Chukar Mary PapaAndreas – Campo Rico Ln Michael Swarts - 300 Shady Valley Rd Linda Brown – 10 Caterpillar Ct Patricia Solero - 4792 Caymus Dr Miraim Golaszewski – 4792 Cosmunes Ct Ken Golaszewski - 1287 Bellatrix Way Carl & Merida Johnson - 11885 Paradise Hills Ct Steven & Kathy Tedford – 12225 Pebble Bluff Dr Kathy Davis – 971 Yellowhammer Dr. Nancy Rikkers – 165 Carlene Dr Thomas & Cheryl Lemke - 11780 Eagle Peak Dr

John & Angel Helming – 415 Metkovich Cir Melody & Mark Chutter – 750 Quintero Lane Christophor & Davi Burke – 75 Quinera Lane

Christopher & Davi Burke – 75 Quivera Lane

Bruce Parks - 228 Bartmess Blvd

Robert & Susan – 2440 La Mancha

Deanna Bragg - 2300 Contrail St

Rob Hoooper 5050 Dolores

Jessica & Justin TenPenny - 595 Valle Verde Dr

Carlos & Evelyn – La Macha

Jamie Shepler – 50 Desert Peak Ct

George Gosar – 3040 Barranca Dr

Gloria Fennimore - En Canto Dr

Kurt Hall – 250 Agua Fria Dr

Brian Goates – 35 Sky Canyon

Kathy Arentz – 300 Quivera Ln

Michael Krause Theresa Bell – 650 Calle De La Plata

Carl Whisman – 435 Alamosa Dr

Merl (Guy) Gessop 2 – 200 Agua Frida Dr

Dyanne Reed - PO Box 4475

Salvadore Munoz – 640 Alamosa Dr

Barbara Sheppard – Family Trust Encanto

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Print Name Jessice Fengenny	Signatur Flis Coffeeyer pate 8-16-24
Address 595 Valle Verde Dv.	Phy TIS 233.7079 procking So yahoo.co
Print Name JEHNY STERLING	Signature Jerry Modery Date 8-16-34
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Print Name Bill Geiger	
Address Hancy C Rikkers	Phil 1752253504 emaily eyes till 696 gmailecon
Print Name Nancy RickKers	Signature Pancy Rikher Date 16 24
Address 165 Car lene Dr Sparks 844 %	Ph#1762265506 emailgrantasticsbeglobalinet
Print Name Polert Long	Signature 7148 75 Date 8-16 24
Address 2440 Ca Marcha	Ph (408) 221 550 mail rb longice agral.
Print Name LOUISA Hammons	Signature B Jamisa Hammos Date 8/16/26
Address 410 Nicole Dr	Ph# email Mourisa @Sbcglobel. net
Print Name Trudi Bush	Signature Rud Bush Date 8/16/24
Address 310 MAYACAMAS CH	Ph# 775-720-1615 email Kbtransportesbeglobal net
Print Name Johnny Hammons	Signature John Planns Date 8-16-2014
Address 410 Nicole De	Signature John Manne Date 8-16-2024 Ph# email johnny-hammon@sbcqbbal-net

Address 435 ARAMOSA DR	Ph# 925 387 0552	email CLU478	1720 CGAMIL, Ca.
Print Name CARLL WHISMAN	Signature Coul o	Certionien	Date 8/11/2029
Address 435 2/4 Masa Dr	Ph# 925	email buhuhi	smen Egment, com
Print Name Gail L. Larger	_Signature <i>Slait</i>		
Address 7.316 Blackmore Way			gon ED annollicon
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Address 327 Omgi Dr. 312m	1-11111 (775) 364-233	Athail Tet Gan	noe o outook
Print Name Judith A. Garnee	_Signature_Jurid	La. James	Dave 2/12/24
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Address 2322 RUDDY WAY			OCS(a) y aleo com
Print Name MINDY RICE	_Signature/M/	Mile	Date <u>8-72-24</u>
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Address 5055 Picite Court	Ph# 805.484.2991 email priscilla - reedy@email.com
Print Name Priscilla Jane Reedy	Signature Princilla Jana Keely Date 08/16/24
Address 719 BARTHESS	Ph#775-162 9432 email ne Clisto @ sleglied
Print Name NAMCY SUE ELCIS	Signature Date 8,16. 1024
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Print Name BANBAKA BOUNGA	Signature Duku Bur Date 8 16-24
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Print Name Shilley Potter	Signature Muly Patter Date 9-16-24
Address 1569 Augusta	Ph# 272-3341 email porterhush & Yahor Com
Print Name LEE WHIPPLE	Signature Las Q Liby Date 8-12-34
Address 1420 LORELAST	Ph#356-03/6 email
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Print Name JEANNE SIMPSOT	Signature Sympson Date
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Print Name PATRICIA McDowell	Signature Patricia Mc Dowell Date 8/16/24
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Print Name Linda Prown			/	Date 8-11-24
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Address 8036 MIRAMAR CT	_Ph#_ 440	7598 email_		·
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Print Name Joanne Birleze K Signature Joans Birlante 8/11/202
(Address 3647 Perseus Dr. phi 222-2245 email JBialczaks 5 Ramil)
Print Name FRANK SOLERO Signature Frank Solice Date 8/11/24
LAddress 3750 (Ayonus DR- Plate email franksolerociumo.com
Print Name STEVEN (EDFORD) Signature Sturing Leafine Date 8/11/14
Address 12225 Persole Bluff Daive Phi 7754245238 email 114714 Tenfanz & gmail
Print Name Kathy Tedford Signature Kathiers Tedfordate 8/11/202
Address 12225 Pethle Bluff DR Ph# (775)424-523 mail Kathy Tedford CG Mai)
Print Name VALERIE USREY Signature Valeir Viry Date \$11/2024
Address 4597 Chronium Ct. SHEKS Ph# 775-800/619 email Brown 410 9mail.
Print Name Michael D. USKEY Signature michael D. Werry Date 9-11-24
Address 4597 Chromiom CT Ph#775-800-1619 email X
Print Name Lois Lund Signature Sois Rund Date 8/11/24
Address 2460 Springland Dr SPARKS Phil 775 636 SIT Zmail Hund 580 Yalios. Co
Print Name Milhael Harris Signature Michael 5. 4 Date 5/11/24
Address 6798 Wild Rever Way Spinks, NV. Ph# 775-842-3376 email hours main @gmy).com
Print Name LANIS L. PETERSON Signature Tamo Televion Date 8/11/24
Address 6687 Fobrie der Spris. NV Ph#775-409-4444email lans peterson Wied. com

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Print Name tothy J. Davis	Signature / Signature / Ph# 775.671.88 12 email_ruskat (Date 8 . 10 . 24
Address 971 Yellowhan mer De	Ph# 775.671.88/12 email rustate	octomancil.co.
Print Name Kussell O.Davis	Signature 30	Date 8. 10.24
Address 7601 DOSCUT PLANS	Ph#171-8446 email beekcgo	e Charter Net
Print Name GROTER BECK	Signature SUKRU BUK	Date 8-10-24
Address	Ph#email	
Print Name Gerrie Mars	Signature Chrac	Date 8/11/24
Address 1230 Junction Dr	Ph# 725203 5884 email CMC/3	4677@ycho.co
Print Name Gine Thisodow	Signature Other	_Date 8/11/24
Address 1230 Junction Dr	Ph#77536 7317 email gine ++	hinodeaugirdoud
Print Name Nancy Rikkers	Signature Mancy Rikkers	Date 08/11/24
Address 165 Carlene Dr	Ph# 225-5506 email gramtas	stice steglobal. Net
Print Name William D Geiger	Signature / Selliem & Hugen	Date <u>081170</u> 29
Address 165 Carlene Dr	Ph#7752255504 emailgeige-bi	11@gmail.com
Print Name WILLIAM M SANDBANK	Signature Im Suh	Date 8 -//- 24
Address 2460 SPRINGLAND DR	Ph#775: 240 9452 mail Bu. SAW	OBALLO DOLCO
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Address 5173 arinda DR GARKS NU	Ph# 750 620% email wweestur	usr@gmail.com
Print Name Denise Howard	Signature Denne Found	Date8/11/24
Address 7797 Covered Wagar Ct	Ph# 775-276-7456 email Howard ja	Gobs@gnaileon

Petition against the Removal of the Cap and Bunk Housing Under Washoe County's HousingAffordability Package 2.5

We are signing this petition as "Citizens of Spanish Springs," to stop the amendments to the housing laws in the Spanish Springs area.

	amond the	wh Date 8-16-2024
Ph# 622-92	89 email_72.57	NKEGGESBCGLOBAL.
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HousingAffordability Package 2.5 We are signing this petition as "Citizens of Spanish Springs," to stop the amendments to the housing laws in the Spanish Springs area. Date 07/29/24 Print Name LAPPLE (SAYNOTH Signature Boarks NV 89434 Address Sparks Ph# email Print Name Signature DSCHHIDTOS@ COMCH email DSCHMIDTOSE COMUNES Ph# Date 7/29/200 Signature VALLES NV 89433 Ph# 775) 74/228 Lamail DIMAS DRAGON & CRAIL COM Address essen Print Name Signature Signature Ph# 775-433-596 2mail RAMW @ yahes. com Address 290 Saintsbury et **Print Name** Signature Donald Print Name Signature Address 986 Ph#/75-Print Name MARTIN DIRK Signature Address 10040 ELLIS P **Print Name** Address 1250 Stic **Print Name** Signature unolabran Address 2200 Ph#7756225202 email 35 Date 7/28/24 Print Name TYUCE Address 228 Bor Knee (email bruce (2204 mail.

HousingAffordability Package 2.5 We are signing this petition as "Citizens of Spanish Springs," to stop the amendments to the housing laws in the Spanish Springs area. Signature Tou G. Moore Print Name Salaw Summit D Signature Ph# 357 ven oskido covahoucow Signatur Address /2/37 kanna Ph# cMahon Print Name Flaina Address 9865 Shadowless Trail Date 7/29/29 Signature Ph#88 -279-0358 email Print Name Haro Ph#775-530-0430 email aaron, Klatt Qout look.com Print Name DRIAN -MAHON Signature Address 78 HADOWLESS TRL Ph#760-608-0763 email MEMANON_BE @M SN.COM Print Name -Signature Ph# 7753880092 amail u. Durnett Qout ook com

Housing Affordability Package 2.5 We are signing this petition as "Citizens "Spanish Springs," to stop the amendments to the housing laws in the Spanish Springs area. Print Name TOE DIPPINZIO Signature Ph#233 804 email DADVATOr @ AO DESERT Print Name & ASON HVALL Signature Ph# 3107277785 email J DUUACE Print Name OARL Signature KGNO Ph# 775972414 Semail Signature Ph# 707 489040 Gemail Print Name LINDAKRUSS Signature Reno Address 105 WIATROSS CT email LMK1000 a Print Name Jennier Signature Address 8735 Lost Crack Ct. Ph# 559 281-2109 email Date /-29-24 Signature 4200 Hackamore Dr Address email Catherine, 13/0 380 3 LOWING WANNE CANS Address 4200 ltwellatmole Mph# 715313.500 kmail Print Name Melissa LOPEZ Signature / Print Name Joseph Sohule Date 7 Signature INCliNE VILLER ન્દુદુષ્ઠ 775.298.298 ail Print Name ELAINE O-RIMES Signature Glasse Address 5435 WINE CEZLAR DE Ph# 408 348 9163 email egrine 500 grimes out me to

HousingAffordability Package 2.5 We are signing this petition as "Citizens & Spanish Springs," to stop the amendments to the housing laws in the Spanish Springs area. Print Name useul Signature 1. Ph#815-5587 email canceg ornell Signature Address /07 Ph# 775-813-0622email guzannemcornell Print Name Da Signature & Brassie Dro Sporksph# 775-287-5135mail Print Name Vicky Signature KENO Ph# 775-322-256 female ralphant vily Qyahoo. Print Name Signature Date_ Address Ph# email Print Name____ Signature Date Address Ph# email Print Name _Signature____ Date Address Ph#____email Print Name Signature Date Address Ph# email Print Name Signature Date Address Ph# email Print Name Signature Date Address Ph# email Print Name Signature Date Address Ph# email

LETITION against the passage of any type of "Apartment" duplex, triplex, or quadplex, Under Washoe County's Housing Affordability Package 2.5, Article 302. We are signing this petition as "Citizens For Spanish Springs" to stop these amendments to the housing laws in the Spanish Springs area.

Print Name DIANA LOCATET	Signature Stand Roeffler Date 9-13-24
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Print Name Donald L Phillips Je	Signature Sald Skill Date 9-13-24
Address 3009 Segre CT	Phil 15. 287-51/2 email dephillips (25716) stregland on
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Address 225 Hercules DR	Ph#775-225-020 mail Ldywriter sheglobold
Print Name Marily Holawrence	Signature Ould Took for Date
Address 5700 Winne in ucca Pak Ra	Signature Ouls Trock for Date Phi 510-816-543 mail eckbound where of the
PringName Michael SACLERS	Signature Mr Medic - Date 9.13.24
Address 3085 BARDANCA DR	Phi 775-425-1980 MKSAUZRSE AH NET
Pring Name Kothi Savers	Signature Cathe Sauera Date 9-13-24
Address 3085 Barranca Dr	Phil 775-425-1980 m. m. Ksallers @att. net
Print Name David Kolika	Signature 1000 John Date 9-13-28
Address 250 Quivera Lane	Ph# 175-425-246 mail_
Print Name Lydia Miranda	Signature Sheare Date 41824
Address 290 Suntsbury Ct	Ph/83/3205935 mail LAM4 KDZO 40.500.
Print Name Sennifer Valight	Signature V. VAMPS - Date 1/32/
Address 3095 Conic Cf	Pho gmall VANAM JANA PALOSIC
Print Name Kary Sweller	Signature La Succe Date 3/13/24
Address Z25 Herculos DC	Ph# 276 47552 Finall
Print Name DYANNE LI READ	Signature Many Than Date 4-18-24
Address 650 ENGINTO DR	Ph/ 846-3968 email NONE

PETITION against the passage of any type of "Apartment" duplex, triplex, or quadplex, Under Washoe County's Housing Affordability Package 2.5, Article 302. We are signing this petition as "Citizens For Spanish Springs" to stop these amendments to the housing laws in the Spanish Springs area.

Print Name Res Horse	Signature Date 9-13-24
Soso Boss Dr.	775-233 CAMADSTORD DELD
Thomas Namas	Show how Date 9-13-24
al .	775 229-623 dirigo o tom @ hotmail-Com
Print Name Row Miranda	Signature Rm Mila Date 9-13-24
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1685 Paradise View Dr.	pt 530:305-6377 beffleredagnail. com
Print Name Chris Westin	Signature / 1/3/24
Morrower Playa Pl.	775-813-8012 Cweshin 22@gmail.com
Print Name ROBERT PLUSSELL	Signature Lat 124 Date 8/13/24
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PETITION against the passage of any type Under Washoe County's Housing Affordal petition as "Citizens For Spanish Springs" Spanish Springs area.	bility Package 2.5, Article 302. W	e are signing this
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PETITION against the passage of any type of "Apartment" duplex, triplex, or quadplex, Under Washoe County's Housing Affordability Package 2.5, Article 302. We are signing this petition as "Citizens For Spanish Springs" to stop these amendments to the housing laws in the Spanish Springs area.

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Petition against the Removal of the Cap and Bunk Housing Under Washoe County's Housing Affordability Package 2.5
We are signing this petition as "Citizens of Spanish Springs," to stop the

amendments to the housing laws in t	he Spanish S	orings area.	1 /
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Print Name Justin Tenpeny	Signature	fry-	Date 7 19 24
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Print Name Jaimer Shepler	Signature/	Mima Theybre	Date_7/19/1024
Address 50 Desert Deak Ot.		email amerolsa	230 gmail-com
Print Name Alex Sheper	Signature	Con Mile	Date 1 19/2024
Address 50 Desect Peak Ct.			n23@gmail-com
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Print Name BOBBY Wagner	Signature_	PUV	Date
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Print Name	Signature_		Date
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Petition against the Removal of the Cap and Bunk Housing Under Washoe County's Housing Affordability Package 2.5 We are signing this petition as "Citizens of Spanish Springs," to stop the

amendments to the housing laws in the Spanish Springs area.

Print Name De Anna Brace Signature Will mna Brace Date 7/19/2024
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