White Owl Drive & Red Rock Road WRZA24-003 Regulatory Zone Amendment APPEAL

CAUTION! CONGESTION AHEAD

Corrections/Clarifications to Planning Dept Presentation

- Surrounding Silver Knolls parcels to the West, North, and East of the proposed change actually average 8+ acres each, not 1 acre
- Staff Comments say that additional housing is needed, but make NO mention of the already approved 9100+ DU's approved for the Red Rock Rd area in the Silver Hills/Silver Star/Evans Ranch planned communities that the applicant is either the full interest developer of, or a partner in
- Planning states that the proposal is in compliance with the Master Plan, when in fact it is in direct violation of section NV.1.5 of the Master Plan, North Valleys Area Plan that does not allow MDS in the Silver Knolls Suburban Character Management Area (SKSCMA)
- There is no mention in their presentation that the proposed area is in a HIGH severity Wildland Urban Interface zone, per the Community Services Dept response, and would pose an increased risk to the existing Silver Knolls community
- There is no mention in their report that there is a proposed Hazardous Materials manufacturing facility (Lyten Gigafactory) within sight of the proposed density increase

Corrections/Clarifications to Applicants Presentation and Reports

- Applicants Traffic study only looks at this single increase in density, NOT the already approved 9100+ DU's and the cumulative impact on Red Rock Road
- This request does not match the applicants already approved Silver Hills East Land Use Plan that is slated for 1 DU/acre to "match" the surrounding Silver Knolls Community (see overhead map)
- The Applicant states that 6840 new DU's are needed in Unincorporated Washoe County by 2042, correct, but Red Rock Road already has 9100+ DU's approved, far exceeding the projected need and making this request UNNESESSARY and detrimental to the Silver Knolls Community
- RTC improvements to widen Moya Blvd. from Red Rock Road to Echo Ave. are now delayed to a timeframe of 2025-2034

NON-ADHERENCE TO "FINDINGS"

- 1. CONSISTENCE WITH THE MASTER PLAN THE REQUEST DOES NOT ADHERE /FOLLOW THE MASTER PLAN/NORTH VALLEYS AREA PLAN, SILVER KNOLLS SUBURBAN CHARACTER MANAGEMENT AREA SECTION NV.1.5 PERTAINING TO ALLOWABLE ZONING DENSITY OF NO MORE THAN 1 DU/ACRE
- 2. COMPATIBLE LAND USE INCREASED DENSITY WOULD HAVE AN ADVERSE EFFECT ON COMMUNITY SAFETY AND WELFARE WITH INCREASED FIRE POTENTIAL AND AN INCREASED STRAIN ON ALREADY SPARSE EMERGENCY SERVICES. HIGHER DENSITY HOUSING LEADS TO LESS DEFENSIBLE SPACE AND DISTANCE BETWEEN HOMES, RESULTING IN A HIGHER FIRE LOAD IN A SMALLER AREA, INCREASING THE FIRE RISK IN AN ALREADY RATED "HIGH" WILDLAND/URBAN INTERFACE ZONE (JUST LOOK AT ALTADENA, CA).

2. COMPATIBLE LAND USE Cont'd:

Storm water runoff/flooding – Converting approx. 165 acres into non-permeable surfaces would increase the runoff from the site, potentially adversely affecting Silver Knolls residents. Additionally, the increased runoff would end up in Silver Lake, raising the flooding to surrounding commercial buildings like Urban Outfiter's, and to Red Rock itself.

- 3. **RESPONSE TO CHANGING CONDITIONS; MORE DESIRABLE USE:**
 - THERE HAVE BEEN NO CHANGES IN CONDITIONS SEEING THAT THE NEEDED/PROJECTED HOUSING NEEDS ARE ALREADY MET WITH THE ALREADY APPROVED DEVELOPENT PROJECTS ON RED ROCK ROAD. (9100+ DU'S APPROVED, ONLY 6840 DU'S NEEDED)
 - THE CHANGE TO HIGHER DENSITY HOUSING WOULD NOT BE ADVISABLE WITH THE PROPOSED HAZARDOUS MATERIALS LITHIUM/SULFUR BATTERY GIGAFACTORY TO BE BUILT AT THE STEAD AIRPORT INDUSTRIAL PARK

4. LACK OF AVAILABILITY FACILITIES:

- Water availability/infrastructure is not available and is miles away in Stead
- Wastewater treatment is not readily accessible, and infrastructure is miles away. There are only 1100 or so connections left, but there are already 9100 approved DU's alone on Red Rock, far exceeding the capacity available
- Law Enforcement is already taxed to the limit, as manning for WCSO has NOT been increased in over 20 years, but population has doubled resulting in code three responses often well over 30 minutes to Red Rock
- Delayed Fire/EMS response to the Silver Knolls community is already well over the desired 8 minute response as stipulated by the National Fire Protection Association (NFPA), with the best response being 12-18 minutes now if Station 44 is available, 25 minutes from Sun valley

4. – LACK OF AVAILABILE FACILITIES Cont'd

- Public Transportation is non-existent on Red Rock Road
- Traffic is routinely gridlocked on 395 and North Virginia we only have one way in/out of the North Valleys, making it very dangerous/impossible during an emergency evacuation.
- The most recent Washoe RTC "Final Draft" 2050 Update released on 3 Jan 2025 changes the information that the Planning Commission had when they passed the proposal. The "new" projections delay the widening of Red Rock Road and the improvement of North Virginia between Stead Blvd and Red Rock to as far out as 2050 (see overhead)
- NDOT's revised improvements to 395 between Stead and Red Rock Road are now also delayed to somewhere between 2035 and 2050 and are UNFUNDED
- NDOT's funding of \$89.4 million for current improvements to 395 from the Federal Infrastructure Act is currently frozen and NDOT does not know its future status

4. LACK OF AVAILABLE FACILITIES Cont'd:

 Red Rock Road Traffic- A study was commissioned in 2019 to look at all the "Approved" housing on Red Rock Road (9100+ DU's between Silver Hills, Silver Star, and Evans Ranch) and how it would cumulatively impact the traffic service levels. Community & Environmental Defense Services produced the 8-page study. Even when expanded to 4 lanes, Red Rock Road will experience a "Level of Service" rating of "F" when Silver Hills, Silver Star, and Evans Ranch are built. This study did not even factor in an additional 4500+ vehicle trips/day from this proposal, making the level of service even worse than "F". (see overhead)

4. LACK OF FACILITIES Cont'd:

- Schools- many are currently over crowed and over capacity
- Health Care Facilities- we have very limited medical care facilities in the North Valleys with Urgent Care sites having irregular/unpredictable hours and NO Emergency Care except 15 plus miles away downtown, which can take over 45 minutes to get to, depending on traffic

5. NO ADVERSE EFFECT:

If passed, the increase in density will have an adverse effect on the Silver Knolls Community by not adhering to the mandated Master Plan, North Valleys Plan section NV.1.5 in the SCSCMA

6. DESIRED PATTERN OF GROWTH:

- The proposed increase in density does not even follow the developers own plan for the adjacent Silver Hills East Plan, where it is planned at 1 DU/acre to match the adjoining Silver Knolls neighborhood (Overhead- see the map from their own Land Use Plan)
- The increase in density is NOT prudent due to the inherent risk the adjacent 1.25 million square foot Hazardous Materials Lithium/Sulfur battery Gigafactory manufacturing facility on the Stead Airport Industrial Park will pose. The Gigafactory will subject all surrounding residential homes to increased risk if there is a fire, so increasing density compounds the risk.(see the RGJ press release on Lyten) (see article on the Moss Landing Lithium Battery fire and mandatory evacuations)

7. EFFECT ON A MILITARY INSTALLATION:

- The Nevada Army National Guard helicopter operations may be adversely affected by elimination of areas to fly, increased noise complaints from close- higher density housing, and an increase in costs to operate due having to train further from the airport
- Having spoken to the Commander of the Base, they were not consulted on this proposal