

December 24, 2019

Angela Fuss, AICP
Planning Manager
Community Development Department
City of Reno
P.O. Box 1900
Reno, Nevada 89505

Subject: City of Reno December 2019 Intake

Dear Ms. Fuss:

The Washoe County Health District, Air Quality Management Division (AQMD) respectfully submits comments on the projects listed below.

1. SPR20-00005 (Swope Middle School Addition and Renovation)
2. LDC20-00036 (Splash Express Car Wash)
3. LDC20-00033 (Coffee N' Comics)
4. LDC20-00038 (Sharlands Business Resource Center PUD Amendment)
5. LDC20-00035 (Project TUSK)
6. LDC20-00032 (Brewer's Cabinet Amendment)
7. LDC20-00031 (Caliber Collision Electric Fence)
8. LDC20-00034 (Reno Logistics Center)
9. LDC20-00002 (Verdi Boat and RV Storage)

The following comments support the goals in the City of Reno's Resolution 8189 (Adopted April 13, 2016). The resolution recognizes the collaborative effort needed by regional partners, such as the City of Reno and Health District, to meet federal air quality standards.

These comments also align with the Ozone Advance Path Forward,¹ ReImagine Reno Master Plan, the City of Reno's Sustainability and Climate Action Plan, the 2019 Truckee Meadows Regional Plan, and the AQMD's Ozone Advance presentation at the March 6, 2019 Reno Planning Commission meeting.

1. National Ambient Air Quality Standards (NAAQS): The U.S. Environmental Protection Agency (EPA) establishes health-based NAAQS for six pollutants including ozone. The ozone NAAQS is 0.070 ppm and Washoe County's most recent design value for 2016-18 is 0.071 ppm. Our ozone levels are directly related to our community's vehicle trips, vehicle miles traveled (VMT), motor vehicle fleet mix, industrial activity, and energy

¹ U.S. Environmental Protection Agency; Advance Program Participants - Washoe County, NV;
<https://www.epa.gov/advance/program-participants-washoe-county-nv>;

usage. Not meeting the NAAQS can have long-term negative public health and economic impacts.

2. Ozone Advance Strategies: The AQMD is one of 30 areas in the country currently accepted into EPA's Ozone Advance program. Ozone Advance's primary goal is to encourage local governments to take proactive steps that improve air quality and prevent a "non-attainment" designation for ozone. The most effective approach to implementing Ozone Advance is to include those strategies into each jurisdiction's codes. AQMD will continue to participate in Reno's Title 18 update and is committed to incorporating Ozone Advance strategies into Washoe County and Sparks' codes. Although the following strategies are voluntary, they are not uncommon in areas that are designated as "non-attainment" for the ozone NAAQS.
 - a. Transportation: Motor vehicles are the largest category of ozone precursors (nitrogen oxides and volatile organic compounds). As appropriate, these projects should incorporate elements that minimize: Vehicle trips, VMT, and tailpipe emissions. Examples include connected active transportation networks; employee trip reduction programs; electric vehicle charging infrastructure; park and ride areas; and Safe Routes to School programs.
 - b. Energy: Buildings use large amounts of energy and water. Short-term investments during construction can reduce the consumption of energy and have long-term air quality benefits. As appropriate, these projects should incorporate an ENERGY STAR or LEED construction standard.
 - c. Schools: Schools attract hundreds to thousands of students who must travel to and from school each day. Infrastructure within two miles of a school determines students' transportation choices. Multiple access points before and after school can greatly reduce travel distances for students that walk and bike. As appropriate, these projects should incorporate: Active transportation infrastructure; connectivity; and Safe Routes to School programs.
 - d. Urban Heat Island (UHI): Summertime temperatures in the Truckee Meadows have been increasing for several decades. Warmer temperatures increase ozone formation as well as increase the energy demand for cooling buildings and motor vehicles. As appropriate, these projects should incorporate best practices that minimize factors contributing to Washoe County's UHI such as: Minimizing heat absorbing impervious surfaces; increasing vegetative cover; incorporating cool corridors and islands; applying cool roof practices to all buildings; Low Impact Development (LID) parking lots; and increasing tree canopies.
 - e. Construction Impacts: Off-road motor vehicles, such as construction equipment, are the second largest category of ozone precursor emissions. Grading operations are also a large source of PM₁₀. As appropriate, these projects should: Incorporate contractors with technologies and policies that reduce unnecessary

Subject: City of Reno December 2019 Intake

Date: December 24, 2019

Page 3 of 3

engine idling; discourage higher polluting construction equipment (Tier 0 or 1 diesel engines); and encourage cleaner construction equipment (Tier 3 or cleaner diesel engines). Two funding resources for contractors with older diesel construction equipment are: 1) EPA's Diesel Emissions Reduction Act (DERA), and 2) VW Mitigation Funds.

Again, thank you for the opportunity to provide comments on these projects. Feel free to contact me at 775-784-7200 if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Francisco Vega". The signature is written in a cursive, flowing style.

Francisco Vega, Director
Air Quality Management Division
Washoe County Health District



REGIONAL TRANSPORTATION COMMISSION

Metropolitan Planning • Public Transportation & Operations • Engineering & Construction

Metropolitan Planning Organization of Washoe County, Nevada

December 26, 2019

FR: Chrono/PL 181-19

Mr. Nathan Gilbert, Associate Planner
Community Development Department
City of Reno
P.O. Box 1900
Reno, NV 89505

RE: LDC20-00035 (Project TUSK)

Dear Mr. Chisholm,

The Regional Transportation Commission (RTC) has reviewed this request for a special use permit to allow grading within two major drainageways in order to accommodate a ±146,500 square foot industrial warehouse development. The ±37.4 acre site is generally located north of North Virginia Street, south of Interstate 395, east of Stead Boulevard, and west of Webb Circle. The site is within the Mixed Use (MU)/North Virginia Transit Corridor (NVTC) zones (a concurrent request for Industrial Commercial (IC) zoning is in process) and has an Industrial Master Plan land use designation.

The 2040 Regional Transportation Plan (RTP) identifies N. Virginia Street and Stead Boulevard as arterials with moderate-access control. To maintain arterial capacity, the following RTP access management standards need to be adhered to:

Access Management Standards-Arterials¹ and Collectors							
Access Management Class	Posted Speeds	Signals Per Mile and Spacing²	Median Type	Left From Major Street? (Spacing from signal)	Left From Minor Street or Driveway?	Right Decel Lanes at Driveways?	Driveway Spacing³
Moderate Access Control	40-45 mph	3 or less Minimum spacing 1590 feet	Raised or painted w/turn pockets	Yes 500 ft. minimum	No, on 6 or 8-lane roadways w/o signal	Yes ⁴	200 ft./300 ft.

¹ On-street parking shall not be allowed on any new arterials. Elimination of existing on-street parking shall be considered a priority for major and minor arterials operating at or below the policy level of service.

² Minimum signal spacing is for planning purposes only; additional analysis must be made of proposed new signals in the context of planned signalized intersections, and other relevant factors impacting corridor level of service.

³ Minimum spacing from signalized intersections/spacing other driveways.

⁴ If there are more than 60 inbound, right-turn movements during the peak-hour.

The policy Level of Service (LOS) standard for North Virginia Street and Stead Boulevard is LOS D. Policy LOS for intersections shall be designed to provide a level of service consistent with maintaining the policy level of service of the intersecting corridor. This project should be required to meet all the conditions necessary to complete road improvements to maintain policy LOS standards.

The 2040 Regional Transportation Plan identifies N. Virginia St from Stead Blvd to Panther Dr. to be widened from 2 to 4 lanes and multimodal improvements in the 2022 – 2026 timeframe. The Capital Improvement Program (CIP) also identifies this as an improvement project in the North Benefit District. Right-of-way should be given to allow space for this widening and/or others for RRIF waivers. The project is also within the North Valleys Regional Transportation Study. This project should be required to meet all the conditions necessary to complete road improvements to maintain policy LOS standards. See the attached typical 98' right-of-way section for a 4-lane facility. Additional right-of-way may be required for dedicated turn lanes at intersections.

The RTP, the RTC Bicycle/Pedestrian Master Plan and the Nevada Department of Transportation Pedestrian Safety Action Plan, all indicate that new development and re-development will be encouraged to construct pedestrian and bicycle facilities, internal and/or adjacent to the development, within the regional road system. In addition, these plans recommend that the applicant be required to design and construct any sidewalks along the frontage of the property in conformance with the stated ADA specifications.

Thank you for the opportunity to comment on this application. Please feel free to contact me at 775-332-0174 or email me at rkapuler@rtcwashoe.com if, you have any questions or comments.

Sincerely,

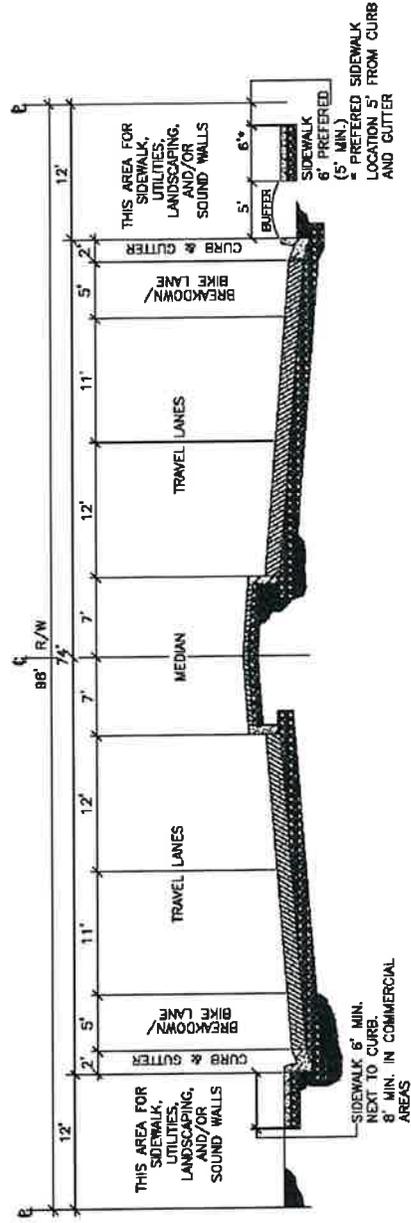


Rebecca Kapuler
Planner

Attachment

Angela Fuss, City of Reno Community Development
Daniel Doenges, Regional Transportation Commission
Scott Miklos, Regional Transportation Commission
Tina Wu, Regional Transportation Commission
Julie Masterpool, Regional Transportation Commission
Andrew Jayankura, Regional Transportation Commission
Brian Stewart, Regional Transportation Commission

TYPICAL 4-LANE RIGHT-OF-WAY SECTION



TYPICAL 98' RIGHT-OF-WAY SECTION
FOUR TRAVEL LANES

REGIONAL TRANSPORTATION COMMISSION
RIGHT-OF-WAY SECTION





To: City of Reno, Business License Division

Business Name: Project TUSK

Case#: LDC20-00035

Address: ¼ mile NE of Stead Blvd & N Virginia St

Completed by: Burow,C 13298

The following document is submitted for your consideration. The ideas, contents herein are the opinions of the listed, qualified Crime Prevention through Environmental Design (CPTED) Police Officer, and are based on CPTED Principles and Factors. Implementation of the recommendations in no way guarantees a crime-free project. Recommendations listed are designed to make the applicant aware of certain issues which may arise and present possible solutions.

Natural Surveillance (Concept focuses on increased visibility):

Noted Concerns: Based on proposed plans, known successful natural surveillance concepts appear to be considered in building design to include open view windows at celebrated entry points of businesses. Parking lot has good visibility and adequate placement of proposed lighting. With such a high visibility area the promotion of natural surveillance may reduce criminal activity. Proposed LED lighting with 90 degree cutoff and uniformity of spread is in accordance with IES standards and promotes a decreased perception of crime and increases natural surveillance of normal users and observers. Color temperatures of 4-5K Kelvin are known to illuminate the most true to color and 4k Kelvin are proposed in the plans. It is encouraged to change the color temperature selection to 5000K lights in outdoor spaces as they are best for commercial purposes and parking lots. 4k Kelvin are ideal for interior work spaces as they do not strain the eye as much with long term exposure.

Possible Solution / Resolution:

Natural Access Control (Concept that focuses on entry & exit points):

Noted Concerns: Natural access control concepts of physically guiding people through the space by strategic design of streets, building entrances, building layout and landscape appear to be implemented based on proposed plans.

Possible Solution / Resolution:

Territorial Reinforcement (Concept of clearly defining ownership over space):

Noted Concerns: The use of pavement treatments in public, semi-public and private space, landscaping, signage, and CPTED fencing all help define ownership of a property which contribute to a reduction in criminal activity and perceived safety. Proposed plans appear to incorporate a celebrated entry way at business entrance which create social management and help ease identification. Building design and color selection is distinct and promotes territorial reinforcement.

Possible Solution / Resolution:

Maintenance and Management (Concept focuses on how Mgmt. runs/maintains property):

Noted Concerns: Maintenance plan to CPTED standards with lower tree canopy trimmed up to a minimum of 6' and low vegetation trimmed below 2' allows for the continued use of space for its intended purpose. Proper maintenance plans define territory, controls access, and creates ownership over space which all contribute to the reduction in criminal activity. Avoidance of low growing vegetation that will grow into the 6'/2' natural surveillance area should be considered to reduce the need for excessive maintenance to keep open visibility.

Possible Solution / Resolution:

Design guide for reviewing project – CHECKLIST

The design guide is summarized in the form of a checklist. The questions help you to go through the security aspects of a project. The checklist will provide an initial crime prevention through environmental design review for the project.

1. Sightlines
2. Lighting
3. Concealed or Isolated Routes
4. Entrapment Areas
5. Isolation
6. Land Use Mix
7. Activity Generators
8. Ownership, Maintenance, and Management
9. Signs and Information
10. Overall Design

<i>Sightlines</i>	Yes	No
1. Can sharp corners or sudden changes in grades that reduce sight lines be avoided or modified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Does design allow clear sight lines and visibility at those areas where they are desired?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Do areas of concerns such as stairwells, lobbies of high-rise building have clear sight lines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. If sight lines are blocked, can it be made visible by using glass or can other enhancements such as mirrors or security cameras be provided? NA	<input type="checkbox"/>	<input type="checkbox"/>
5. Does design allow for future sight line impediments such as landscaping in maturity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6. Does access to hidden areas such as underpasses or parking areas have clear sight lines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Lighting	Yes	No
1. Is there a need for lighting to be provided if the paths or spaces are not used at night?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is lighting adequately provided such that a person can recognize a face from about 10 metres?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Does lighting provide uniform spread and reduce contrast between shadow and illuminated areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Is lighting provided too glaring?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Are light fixtures provided for areas that require good visibility such as pedestrian routes and entrapment areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Are light fixtures protected against vandalism or made of vandal resistant materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Is lighting at areas used during night time e.g. parking lots, space around buildings adequately provided?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Is back lane lighting required? NA	<input type="checkbox"/>	<input type="checkbox"/>

Concealed or Isolated Routes	Yes	No
1. Can concealed and isolated routes such as staircases, passageways or tunnels be eliminated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Are there entrapment areas within 50 - 100 meters at the end of a concealed or isolated route?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Is there an alternate route?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4. If a pedestrian cannot see the end of a concealed or isolated route, can visibility be enhanced by lighting or improving natural surveillance? NA	<input type="checkbox"/>	<input type="checkbox"/>
5. Are concealed or isolated routes uniformly lit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Is there natural surveillance by people or activities through various land uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Is there formal surveillance? UNKNOWN	<input type="checkbox"/>	<input type="checkbox"/>
8. Is access to help e.g. security alarm, emergency telephones, signage and information available? UNKNOWN	<input type="checkbox"/>	<input type="checkbox"/>

<i>Entrapment Areas</i>	Yes	No
1. Is there an entrapment area and can it be eliminated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Can it be closed during off hours?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Is the entrapment area visible through natural or formal surveillance? NA	<input type="checkbox"/>	<input type="checkbox"/>
4. Does design provide for escape routes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<i>Isolation</i>	Yes	No
1. Does design incorporate natural surveillance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Do areas of concerns such as isolated routes and parking areas provide natural surveillance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. If providing natural surveillance is not possible, are emergency telephones, panic alarm and attendants provided? NA	<input type="checkbox"/>	<input type="checkbox"/>

4. Can compatible land uses be provided to increase activity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Land Use Mix	Yes	No
1. Are different land uses compatible?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Can land uses that raise security concerns e.g. bars and pubs, be located where their impact is minimized?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Activity Generators	Yes	No
1. Can complementary uses that promote natural surveillance be provided?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Does design provide for complementary users?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Does design reinforce activity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Is the area programmed for various events or activities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Can a clustering of uses be used to support the intended activity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Are ground level activities incorporated in design?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Can areas be programmed to facilitate increased activity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Ownership, Maintenance, and Management	Yes	No
1. Does the design provide territorial reinforcement through design features?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. Does the design allow for easy maintenance?	X	<input type="checkbox"/>
3. Are there signs and information to guide people on how to report maintenance concerns? UNKNOWN	<input type="checkbox"/>	<input type="checkbox"/>
4. Does the management of space provide maintenance priorities e.g. removal of offensive graffiti? UNKNOWN	<input type="checkbox"/>	<input type="checkbox"/>
Signs and Information	Yes	No
1. Are signs visible and legible?	X	<input type="checkbox"/>
2. Are signs conveying messages clearly?	X	<input type="checkbox"/>
3. Is information adequate?	X	<input type="checkbox"/>
4. Are sign strategically located to allow for maximum visibility?	X	<input type="checkbox"/>
5. Are signs well maintained? NA	<input type="checkbox"/>	<input type="checkbox"/>
6. Are maps provided in large areas such as underpasses, parks, etc.? UNKNOWN	<input type="checkbox"/>	<input type="checkbox"/>
7. Are signs displaying hours of operation? UNKNOWN	<input type="checkbox"/>	<input type="checkbox"/>

Overall Design	Yes	No
1. Do quality and aesthetically pleasing built environments compromise security concerns?	<input type="checkbox"/>	X
2. Is the scale of development consistent with neighbors to avoid large gaps on streets?	X	<input type="checkbox"/>

3. Is design of the built environment simple and easy to understand?	X	<input type="checkbox"/>
4. Is there space that can become dead space?	<input type="checkbox"/>	X
5. How is the built environment used at night time? UNKNOWN	<input type="checkbox"/>	<input type="checkbox"/>
6. Are construction materials used to enhance safety and security?	X	<input type="checkbox"/>

Additional Comments / Concerns:

Working within the confines of the lot wrapping around and existing mobile home park, the design is well thought out and incorporates many CPTED principles.