



**Washoe-Storey
Conservation
District**

**Natural Resource
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**Subject: February Agency Review – Case Nos. AC15-002; SB15-001; SB14-014;
VA15-001 and VA15-002**

To whom it may concern,

Thank you for providing us the January Agency Review and the opportunity to review and provide comments. We have reviewed the subject proposed projects and we have the following comments:

Case No. AC15-002– Evans Greenhouse

The proposed project is to construct two greenhouses, Phase 1 of 4,000 sq. ft. and Phase 3 of 30,000 sq. ft. Phases 2 and 4 are not requested at this time.

1. The plans must include details on what type of BMP’s will be utilized and their placement for mitigation of soil erosion.
2. Grading Plan Drawing C-2 – We noted that the applicant has designated the limits of the 100-year flood plain, but does not have the Ordinary High Water Mark of the Truckee River delineated, nor is there any indication of whether or not there are any adjacent wetlands within the flood plain.
3. Grading Plan Drawing C-2 – We also noted that the applicant’s note that they are proposing to clear vegetation between the fence line the riverward property line. We have several concerns with this action:
 - a. The removal of vegetation will make this area more susceptible to erosion during periods of high water. We recommend the County condition the permit to maintain a native vegetation in this area and plant native willows along the bank of the river to minimize erosion.
 - b. As mentioned in comment 2 we are concerned that there could be adjacent wetland in the designated flood plain area and that if any work occurs below the Ordinary High Water Mark, permits under Section 404 of the Clean Water Act would be required from the Corps of Engineers and under Section 401 of the Clean Water Act from the Nevada Department of Environmental Protection. We suggest the County add a condition that requires the applicant to have a wetland delineation conducted to delineate the Ordinary High Water Line and any adjacent wetlands prior to any approvals being given.
4. The applicant must provide evidence that they are applying for any and all necessary permits from all state and Federal agencies, including the tribes, and that they have been issued prior to construction.

Case No. SB15-001 – Mustang Industrial Development - Special Use Permit

The proposed project is to construct a light industrial development including two buildings of 344,000 sq. ft. and 517,000 sq. ft. and associated parking and access roads and other accessory features such as storm water ponds on the 117.76 acre project site. The project will involve cut of 355,417 cu. yd. and 356,216 cu. yd. fill requiring a total of 799 cu. yd. of additional fill. Approximately 80.82 acres or 68.63% of the project site will be disturbed.

We have the following comments on this proposed project:

1. The proposed project is located within a designated FEMA Flood Zone and there is no mention of this on the entire application other than an aerial photo showing the area. There is no mention of the applicant's mitigation measures to stay out of the flood zone or prevent flooding of the facilities. Of primary concern is the potential of the proposed sanitary sewer line which traverses the length of the properties along the river's high water line back to the septic tanks and leach fields.
2. Item 10 – In response to Item 10 the applicant states that once the grading activities have been completed that all disturbed 3:1 slope be treated with 6-12" rip-rap for erosion protection. We would recommend that the County condition the permit to have these areas be stabilized with bio-engineering methods reviewed by the Natural Resources Conservation Service (NRCS).
3. Item 15 – In response to Item 15 regarding the type of seed mix to be used the applicant responded ... "A native grass and shrub mix per site specific seed mix by Comstock Seed Company will be broadcast at approx. rate of 20lbs/ac and lightly chain dragged. A tackifier will be applied at 200 lbs and the area will be hydro-mulched with Ecoaegis Fiber Matrix at the rate of 2000 lbs. /ac. We recommend the permit be conditioned to require that all seed mixes be provided to the Washoe/Storey Conservation District for coordination with the NRCS. We recommend to ensure that native species of trees shrubs and grasses are planted on the project that the County require that applicant, by Special Condition to the permit, submit their proposed planting plan to the Washoe/Storey Conservation District, who in coordination with the USDA Natural Resources Conservation Service, will review and approve the plants and seed mix to be used
4. Item 17 – In response to Item 17 regarding the review of the Revegetation plan by the Washoe /Storey Conservation District, the applicant replied ... "No, we are deferring to the expertise of Comstock Seed's local expertise."... We recommend the permit be conditioned to require the applicant to coordinate their Revegetation Plan with the Washoe/Storey Conservation District.
5. Conceptual Landscaping Plan – Drawing LC2.1 – Revegetation Notes – the drawings indicate that that ... "Revegetated areas shall be acceptable if they exhibit a minimum of 90% coverage by at least three different species within three months of planting"... The Washoe/Storey Conservation District feels that this monitoring period and success criteria are not adequate to develop a sustainable vegetative cover. We recommend that the County require monitoring for a period of three years with a 90% total cover. If this is not attained then the applicant would be required to reseed and monitor until the success criteria is made. We recommend that the applicant be required to provide a detailed irrigation plan for review. The plan should include the calculations for how much water is proposed for use to maintain the landscaping plan and is there adequate water rights for the amount calculated
6. The proposed plan drawings do not clearly show where and what type of BMPs will be installed and maintained during the grading operations. We recommend that the County require the applicant to submit a detailed grading plan and SWPP that clearly show the BMPs to be utilized during construction and during operation of the facility to minimize impacts to water quality from storm water runoff.
7. The project is also located adjacent to the Truckee River which is a jurisdictional water of the United States under Section 404 of the Clean Water Act. We recommend the applicant have a jurisdictional wetland delineation and Ordinary High Water Line determination performed and submitted to the Corps of Engineers for approval. This will allow the applicant to be ensured that his proposed project will not involve the deposition of fill or dredged material into jurisdictional waters of the United States. Should jurisdictional waters and wetlands be identified on the

property, the applicant may be required to obtain a Department of the Army Permit unless they can avoid impacts to those areas identified.

CASE Nos. SB14-014; VA15-001 and VA15-002 – We have no comments on these actions.

These are our comments and recommendations for the subject projects. We appreciate the opportunity to provide comments and recommendations on projects that may have impacts on our natural resources. Should you have any further questions please contact Kevin J. Roukey by phone at 775-232-1571 or email kevinjr_51@att.net.

Sincerely,

Kevin J. Roukey
Washoe/Storey Conservation District