



## **Environmental Control**

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### **MEMORANDUM**

**Date:** January 24, 2024  
**To:** Mike Railey – Planning Manager  
Planning Desk  
**From:** Eric Farrar, Environmental Control Officer  
**Subject:** **January 8, 2024 Current Development Projects Review/Comments**

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The Environmental Control Section (EC) under the Utility Services Department has reviewed the Development Projects memorandum dated December 26, 2023. We offer the following comments or conditions:

#### **Cold Springs RV Storage- LDC24-00032**

Servicing and maintenance of vehicles will be prohibited. Any operation which plans to offer washing of vehicles, RVs, and boats which involves the cleaning of vehicles or vehicle parts by washing or steam cleaning is also not allowed. This includes, but is not limited to, auto repair, vehicle service, engine maintenance, auto body repair, and/or vehicle detail services. If these activities are planned the facility shall install a properly sized sand-oil separator and obtain an Environmental Control permit.

#### **Plumb Lane Properties- LDC24-00033**

Depending on the future use of the property following designation as General Commercial Zone, pretreatment devices such as grease interceptors and/or sand/oil interceptors may be required.

#### **Reno Rock Transport- LDC24-00034**

Pages 28-30 of the submitted Site Plan Review and Alternative Equivalent Compliance application discuss the current and proposed Drainageway Protection plan and includes photos of the current drainageway protection system. This system as depicted in the photos consists of fiber rolls installed in areas where not blocked by vegetation. The fiber rolls are not trenched or staked and in at least one photograph are overtopped by sediment. In order to provide effective control of sediment contained in stormwater runoff, fiber rolls must be installed perpendicular to the slope, trenched at least two inches to provide adequate soil contact, staked every 4 feet to prevent movement, and replaced when the captured sediment reaches a depth of 1/3 the upslope height of the roll above the trench or the roll becomes damaged. EC will require the applicant to prepare and / or update a stormwater management plan prior to approval of this application. EC is available to meet with the applicant to discuss the requirements of this plan.

**North Virginia and Webb Industrial- LDC24-00035**

Depending on the future use of the property following industrial warehouse construction, pretreatment devices such as grease interceptors and/or sand/oil interceptors may be required.

**525 East Plumb Lane- LDC24-00036**

Depending on the future use of the property following designation as General Commercial Zone, pretreatment devices such as grease interceptors and/or sand/oil interceptors may be required.

February 13, 2024

City of Reno  
Planning and Development Division  
PO Box 11130  
Reno, NV 89520-0027

RE: Cold Springs RV Storage; 087-281-06  
Conditional Use; LDC24-00032

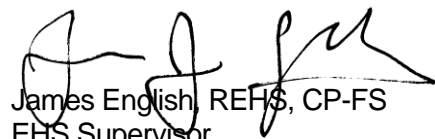
Dear City of Reno Staff:

Northern Nevada Public Health (NNPH), Environmental Health Services Division (EHS) has reviewed the above referenced project.

1. EHS has reviewed the above referenced application and has concerns for its approval as submitted.
2. The business and subsequent parcel are not currently served by community water and sewerage systems. Based on high ground water and the risks of flooding on the subject parcel, NNPH would request the project be served by community water and sewerage systems although it cannot be required.
3. It is noted during the 2017 storm events large portions of this parcel were impacted by White Lake.
4. If the application is approved all subject civil improvement or building plans must be routed to EHS for review and approval.
5. If the project is to have a RV dump station as part of a future construction design, the dump station will be subject to permitting from EHS.

If you have any questions or would like clarification regarding the foregoing, please contact James English, EHS Supervisor at [jenglish@nnph.org](mailto:jenglish@nnph.org) regarding all Environmental Health comments.

Sincerely,



James English, REHS, CP-FS  
EHS Supervisor  
Environmental Health Services  
Northern Nevada Public Health

## RE: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

Bohannon, Samuel T CIV USARMY CESPK (USA) <Samuel.T.Bohannon@usace.army.mil>

Mon 2/5/2024 7:53 AM

To: Daniel Martoma <MartomaD@reno.gov>

Hi Daniel,

The Washoe County Regional Mapping System clearly shows that the southern edge of parcel 087-281-06 may be within the ordinary high water mark (OHWM) of White Lake. I'm unable to find any previous jurisdictional determination information about White Lake, but it appears to be a endorheic or closed basin which the Corps may determine to be non-jurisdictional. However, without the Corps evaluating an approved jurisdictional determination request (AJD), I would recommend that the project footprint not encroach the OHWM of White Lake. The Nevada Division of Environmental Protection may also be interested in this project, given that White Lake may be a Water of the State and could require permitting from the state. I hope this information helps. Please feel free to forward my contact information to the project proponent(s). Have a great day.

V/R,

Samuel Thomas Howe Bohannon  
Senior Regulatory Project Manager  
US Army Corps of Engineers 🇺🇸  
Sacramento District, Regulatory Program, Nevada Section  
Reno Regulatory Office  
300 Booth Street, Room 3050  
Reno, Nevada, 89509-1328  
Cell: (775) 444-5596  
Office: (775) 799-8232  
[Samuel.T.Bohannon@usace.army.mil](mailto:Samuel.T.Bohannon@usace.army.mil)

Let us know how we're doing. Please complete the survey at:  
<https://regulatory.ops.usace.army.mil/customer-service-survey/>

Need information on the Regulatory Program?  
<http://www.spk.usace.army.mil/Missions/Regulatory.aspx>

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**From:** Daniel Martoma <MartomaD@reno.gov>

**Sent:** Friday, February 2, 2024 4:30 PM

**To:** Bohannon, Samuel T CIV USARMY CESPK (USA) <Samuel.T.Bohannon@usace.army.mil>

**Subject:** [Non-DoD Source] Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

Hi Samuel,

This email is to inform you that the City has received the attached development application for the above-referenced site. If you would, please provide any comments from your agency to assist City staff in our review of the application.

If you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

**Daniel Martoma**



*Associate Planner Specialist*

Development Services

775-334-2307 (o)

775-342-5699 (c)

[martomad@Reno.Gov](mailto:martomad@Reno.Gov)

1 E. First St., Reno, NV 89501

[Reno.Gov](http://Reno.Gov) | Connect with us: [!\[\]\(8bba887393ca45b761e5cb49e755e762\_img.jpg\)](#) [!\[\]\(b898b980f2d860cdb0237afbc3664529\_img.jpg\)](#) [!\[\]\(489b6f540446f926b6e5cda90c9ff8a8\_img.jpg\)](#) [!\[\]\(e7f9874ca42cf008bd27d8f4defa2004\_img.jpg\)](#) [!\[\]\(4315fdb6752214df85d83f5570c149b4\_img.jpg\)](#)

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## Re: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

Mitchell Cowles <mcowles@ndep.nv.gov>

Wed 2/7/2024 11:14 AM

To: Daniel Martoma <MartomaD@reno.gov>

Cc: Donette Barreto <dbarreto@ndep.nv.gov>; Robert Zeyer <rzeyer@ndep.nv.gov>

 1 attachments (5 KB)

Outlook-liwv41ti;

Good morning Daniel,

After reviewing the application the BWPC has the following concerns regarding permitting.

1. The project triggers a construction stormwater permit due to the size. See description below:
2. The project mentions Septic as the means of wastewater treatment. I have copied our OSDS branch members on this response. They will require a permit for groundwater discharges from an OSDS system.
3. A working in waters permit may be needed from the permits branch of the BWPC if the disturbance includes any work inside of the banks of a waterbody, flowing or ephemeral. This is a Waters of the State permit, not a Waters of the United States. This is temporary in nature and only last 6-months.

Information for our construction stormwater permit can be found here:

<https://ndep.nv.gov/water/water-pollution-control/permitting/stormwater-discharge-permits/construction-sites-greater-than-1-acre>

Information regarding the OSDS permit can be found here:

<https://ndep.nv.gov/water/water-pollution-control/permitting/onsite-sewage-disposal-system-program>

Information for the working in waters permit can be found here:

<https://ndep.nv.gov/water/water-pollution-control/permitting/temporary-permits/temporary-discharge-working-in-waterway>

Other potential permits relating to construction activities that may or may not apply are the Dewatering DeMinimis Permit, which covers dewatering to Waters of the United States, and TNS Temporary Discharge which covers temporary discharge of treated wastewater (dust control).

An air permit may be necessary but please contact the Air Bureau for more information as it rests outside of Water Pollution Control.

Best regards,

Mitch

**Mitch Cowles, E.I.**

Staff II, Associate Engineer

Stormwater, Bureau of Water Pollution Control

Nevada Division of Environmental Protection

Department of Conservation and Natural Resources

901 S. Stewart Street, Suite 4001

Carson City, NV 89701

[mcowles@ndep.nv.gov](mailto:mcowles@ndep.nv.gov)

(O) 775-687-9569 | (F) 775-687-4684



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**From:** Daniel Martoma <MartomaD@reno.gov>

**Sent:** Tuesday, February 6, 2024 4:58 PM

**To:** Mitchell Cowles <mcowles@ndep.nv.gov>

**Subject:** Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Mitch,

This email is to inform you that the City has received the attached development application for the above-referenced site. If you would, please provide any comments from your agency to assist City staff in our review of the application.

If you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,



**Daniel Martoma**

*Associate Planner Specialist*

Development Services

775-334-2307 (o)

775-342-5699 (c)

[martomad@Reno.Gov](mailto:martomad@Reno.Gov)

1 E. First St., Reno, NV 89501

[Reno.Gov](http://Reno.Gov) | Connect with us:     

**Re: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)**

Robert Zeyer <rzeyer@ndep.nv.gov>

Thu 2/22/2024 4:40 PM

To: Daniel Martoma <MartomaD@reno.gov>

Cc: Donette Barreto <dbarreto@ndep.nv.gov>; Joshua Sapper <jsapper@ndep.nv.gov>

Hi Daniel,

Installing an OSDS in an AE "high-risk" Flood Zone is definitely not recommended given the level of risk of flooding and system failure. Anything south of Village Parkway is going to be encroached upon by water. I'm not sure what the depth to groundwater is out there but that's another issue that may have to be dealt with as well. In my opinion, this lot is not suitable for subsurface disposal such as an OSDS. If the issue was just a high-water table, then a mound system, or some other engineered system, could be installed to deal with high groundwater. But since this area is known for flooding, I'm worried the soil will be too saturated and unsuitable to provide any treatment and could cause the wastewater effluent to surface. I'm not sure what the owner's budget is, but to engineer the site to make it suitable for an OSDS or an RV storage facility is likely cost prohibitive. Maybe a lift station could be constructed to transport the wastewater to the nearest public sewer system, but that even may be cost prohibitive as well. If there is a solution to this situation, it's probably going to be really expensive. Even if we did entertain the idea of trying to permit this, it would also be an arduous process for everyone involved.

I'm not sure if Washoe County or Northern Nevada Public Health would have any jurisdiction over this, but if they do, I can guarantee they would not approve of it.

Thank you,

**Robert Zeyer**

Staff I, Associate Engineer

Permit Branch, Bureau of Water Pollution Control

Nevada Division of Environmental Protection

Department of Conservation and Natural Resources

901 S. Stewart Street, Suite 4001

Carson City, NV 89701

[rzeyer@ndep.nv.gov](mailto:rzeyer@ndep.nv.gov)

(O) 775-687-9432 |



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**From:** Daniel Martoma <MartomaD@reno.gov>

**Sent:** Thursday, February 22, 2024 10:17 AM

**To:** Robert Zeyer <rzeyer@ndep.nv.gov>

**Cc:** Joshua Sapper <jsapper@ndep.nv.gov>; Mitchell Cowles <mcowles@ndep.nv.gov>

**Subject:** Re: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.



Hi Robert,

Thank you so much for reaching out so quickly. One specific question our team has regarding this development application is the feasibility of an OSDS Permit being approved for a "commercial septic system" (as described in the applicant's project narrative) in an AE Flood Zone, especially given the potential "flooding" and "system failure" issues you noted. The proposed location of the septic system will be just north of their proposed retention pond, just southwest of a proposed office building, and proximally south of Village Parkway (appearing to be separated only by a 10' PUE).

Any further insight you can offer is greatly appreciated. Thank you.

Sincerely,

Daniel Martoma

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**From:** Robert Zeyer <rzeyer@ndep.nv.gov>

**Sent:** Thursday, February 22, 2024 9:46 AM

**To:** Daniel Martoma <MartomaD@reno.gov>

**Cc:** Joshua Sapper <jsapper@ndep.nv.gov>; Mitchell Cowles <mcowles@ndep.nv.gov>

**Subject:** Re: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

Good morning Daniel,

The regulations that govern commercial OSDS are NAC 445A.950 thru NAC 445A.9706 (attached), inclusive. Septic tank sizing/capacity (NAC 445A.9656) can be determined from projected daily sewage flow rates based on type of occupancy for the proposed facility (Table H 201.1(4) - Appendix H of 2021 Uniform Plumbing Code (UPC)) and/or from total drainage fixture unit counts for the proposed facility based on Table 702.1 from Chapter 7 and Table H 201.1(1) from Appendix H in the 2021 UPC.

For conventional (stone & pipe) disposal fields (leach fields), the required size of the effluent absorption area (NAC 445A.9674) is determined by the size/capacity of the septic tank and the long-term acceptance rate (LTAR) of the soil, which is determined by percolation rates or from a soil composition analysis. If using chambers in lieu of your traditional stone & pipe field, please contact Infiltrator Systems, Inc. for assistance with determining the required size of the disposal field and the number of chambers required.

Required setbacks for septic systems can be found in NAC 445A.965.

I've also attached NDEP's OSDS Guidance Manual for Design Engineers to facilitate the application and permitting process. This document is derived from both the EPA, NAC 445A, and the UPC.

I noticed the property sits on the edge of White Lake near Cold Springs and Border Town. I'm not sure where they are planning on installing the OSDS on the property but flooding and system failure could be an issue for this system given the proximity to the dry lake (which probably isn't dry right now). It is also worth noting that a minimum of 4-feet of separation between the bottom of the disposal field and the seasonal high-groundwater table needs to be maintained.

If you have any questions or concerns, please feel free to contact me or Mr. Josh Sapper (cc'd).

Thank you,

**Robert Zeyer**

Staff I, Associate Engineer  
Permit Branch, Bureau of Water Pollution Control  
Nevada Division of Environmental Protection  
Department of Conservation and Natural Resources  
901 S. Stewart Street, Suite 4001  
Carson City, NV 89701  
[rzeyer@ndep.nv.gov](mailto:rzeyer@ndep.nv.gov)  
(O) 775-687-9432 |



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**From:** Mitchell Cowles <mcowles@ndep.nv.gov>  
**Sent:** Thursday, February 22, 2024 7:01 AM  
**To:** Daniel Martoma <MartomaD@reno.gov>  
**Cc:** Joshua Sapper <jsapper@ndep.nv.gov>; Robert Zeyer <rzeyer@ndep.nv.gov>  
**Subject:** Fw: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

Daniel,

I forwarded this email along to our OSDS team members. From my experience in the OSDS program, as long as the submittal meets the regulations listed in the NAC for OSDS projects it is generally good for approval but I will let them answer any specifics on the matter. If you have questions please reach out to Robert Zeyer or Josh Sapper who I cc'd in this email.

Best regards,

Mitch

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**From:** Daniel Martoma <MartomaD@reno.gov>  
**Sent:** Wednesday, February 21, 2024 4:34 PM  
**To:** Mitchell Cowles <mcowles@ndep.nv.gov>  
**Subject:** Re: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Mitch,

I just wanted to circle back with you on the above-referenced development application the City received. As you noted in your comments, the project proposes the installation of a commercial septic system to be maintained by the owner to which your provided response was that an OSDS Permit would be required.

Generally speaking, *what is the feasibility of this permit being approved for this type of proposed work?* Any insight you can give regarding this and the other permits you cited (i.e. Construction Stormwater Permit, "Working in Waterways" Temporary Permit, etc.) would be greatly appreciated. Thanks for your help.

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**From:** Daniel Martoma <MartomaD@reno.gov>  
**Sent:** Wednesday, February 7, 2024 11:16 AM  
**To:** Mitchell Cowles <mcowles@ndep.nv.gov>  
**Subject:** Re: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

Thank you, Mitch.

---

**From:** Mitchell Cowles <mcowles@ndep.nv.gov>  
**Sent:** Wednesday, February 7, 2024 11:14 AM  
**To:** Daniel Martoma <MartomaD@reno.gov>  
**Cc:** Donette Barreto <dbarreto@ndep.nv.gov>; Robert Zeyer <rzeyer@ndep.nv.gov>  
**Subject:** Re: Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

Good morning Daniel,

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1. The project triggers a construction stormwater permit due to the size. See description below:
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Information regarding the OSDS permit can be found here:

<https://ndep.nv.gov/water/water-pollution-control/permitting/onsite-sewage-disposal-system-program>

Information for the working in waters permit can be found here:

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An air permit may be necessary but please contact the Air Bureau for more information as it rests outside of Water Pollution Control.

Best regards,

Mitch

---

**From:** Daniel Martoma <MartomaD@reno.gov>

**Sent:** Tuesday, February 6, 2024 4:58 PM

**To:** Mitchell Cowles <mcowles@ndep.nv.gov>

**Subject:** Development Application Received and Under Review/Cold Springs RV Storage (APN 087-281-06)

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If you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

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**CONFIDENTIALITY NOTICE:**



**To:** City of Reno, Business License Division

**Business Name:** Cold Springs RV Storage **Case#:** LDC24-00032

**Address:** 0 Village Parkway

**Completed by:** Burrow, T 14745

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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: Steps should be taken to incorporate natural surveillance elements that increase the threat of apprehension by taking steps to increase the perception that people can be seen. Open view CPTED fencing throughout property promotes natural surveillance of passing observers. LED lighting with 90 degree cutoff and uniformity of spread in accordance with IES standards (proper color temperature to illuminate true to color) promotes a decreased perception of crime and increases natural surveillance of normal users and observers.

**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 in place based on preliminary site plans

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

Noted Concerns: The use of pavement treatments in 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. Controlled access gate with surveillance of incoming and outgoing customers helps deter criminal activity and allows for case follow up regarding calls for service.

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

Noted Concerns: Upon development, maintenance and management techniques should be implemented. Proper maintenance plans define territory, controls access, and creates ownership over space which all contribute to the reduction in criminal activity. Landscape should be maintained to CPTED standards with lower tree canopy trimmed up at least 6' and bushes/shrubs trimmed down to 2' to keep open visibility in this desired range.