

Washoe County Appeal of Decision to Board of County Commissioners

Your entire application is a public record. If you have a concern about releasing personal information please contact Planning and Building staff at 775.328.6100.

Appeal of Decision by (Check one)	
Note: Appeals to the Washoe County Board of County Commissioners are governed by WCC Section 110.912.20.	
☒ Planning Commission	☐ Board of Adjustment
☐ Hearing Examiner	☐ Other Deciding Body (specify) _____
Appeal Date Information	
Note: This appeal must be delivered in writing to the offices of the Planning and Building Division (address is on the cover sheet) within 10 calendar days from the date that the decision being appealed is filed with the Commission or Board Secretary (or Director) and mailed to the original applicant.	
Note: The appeal must be accompanied by the appropriate appeal fee (see attached Master Fee Schedule).	
Date of this appeal: <u>January 20, 2026</u>	
Date of action by County: <u>January 6, 2026</u>	
Date Decision filed with Secretary: <u>January 9, 2026</u>	
Appellant Information	
Name: World Properties, Inc.	Phone: 775.327.3020
Address: c/o Holland & Hart LLP	Fax:
5470 Kietzke Lane	Email: DRThornley@hollandhart.com
City: Reno State: NV Zip: 89511	Cell:
Describe your basis as a person aggrieved by the decision: World Properties, Inc. is the property owner and applicant.	
Appealed Decision Information	
Application Number: WTM24-001 and WSUP25-0019	
Project Name: Sierra Reflections and Sierra Reflections Infrastructure	
State the specific action(s) and related finding(s) you are appealing: The specific actions being appealed are the Washoe County Planning Commission's January 6, 2026, denial of Tentative Subdivision Map Case Number WTM24-001 (Sierra Reflections) and Special Use Permit Case Number WSUP25-0019 (Sierra Reflections Infrastructure). The related findings are found in the following sections of the Washoe County Development Code: Section 110.608.25 (Tentative Subdivision Maps) Section 110.810.30 (Special Use Permits) and Section 110.408.28 (Common Open Space Development).	

Appealed Decision Information (continued)

Describe why the decision should or should not have been made:

The Planning Commission's January 6, 2026, denial of WTM24-001 and WSUP25-0019 was arbitrary and an abuse of discretion because it ignored substantial evidence, including staff's approval recommendation and expert reports on geotechnical, remediation, hydrology, aquatic, cultural, traffic, and fiscal aspects proving conformance with the Master Plan, zoning, and Code Sections 110.608.25, 110.810.30, and 110.408.28. It relied on unsubstantiated public opposition, prioritized aspirational master plan elements over long-standing zoning allowing 995 units, and, after 40 years of reasonable, investment backed expectation, deprives the land of its economic value without compensation.

Cite the specific outcome you are requesting with this appeal:

The appeal requests that the Washoe County Board of County Commissioners reverse the Planning Commission's January 6, 2026, denial and approve Tentative Subdivision Map WTM24-001 (Sierra Reflections) and Special Use Permit WSUP25-0019 (Sierra Reflections Infrastructure), based on a de novo review recognizing the project's conformance with zoning, the Master Plan, and Development Code.

Did you speak at the public hearing when this item was considered?

☒ Yes
☐ No

Did you submit written comments prior to the action on the item being appealed?

☒ Yes
☐ No

Appellant Signature

Printed Name: Douglas Thornley

Signature:

Date: January 20, 2026

January 20, 2026

Washoe County Commission
1001 E. 9th Street
Reno, NV 89512

**Re: Administrative Appeal of January 6, 2026, Planning Commission Denial of
WTM24-001 (Sierra Reflections) and WSUP25-0019 (Sierra Reflections
Infrastructure)**

Chair Andriola and members of the County Commission:

The Sierra Reflections tentative map proposes a 940-lot common open space residential subdivision spanning 759.7 acres in Washoe County's South Valleys Planning Area. This development dedicates 468.1 acres - equivalent to 61.6% of the total site - to preserved open space, multi-use trails, parks, and environmental buffers, while strategically clustering residential lots on the remaining 291.6 acres to minimize ecological impact. The current application enhances a previously approved tentative map from 2006 (TM06-001) by expanding open space from 54% to 61.6%, reducing bridge crossings from four to three, and integrating modern sustainability features such as comprehensive mercury remediation, avoiding critical stream zones and all sensitive stream zone areas with the exception of the 3 bridge crossings, Dark Skies-compliant and minimal outdoor lighting, and long planned utility extensions and upgrades. This iteration reflects a commitment to environmental stewardship and community integration, addressing contemporary standards while honoring the site's long-standing development vision. The 29 parcels that comprise the site carry multiple master plan designations within the South Valleys Planning Area, specifically Suburban Residential, Rural, and Rural Residential, and are zoned Medium Density Suburban, Low Density Suburban, Medium Density Rural, General Rural, and Public and Semi-Public.

The project's foundations trace back more than four decades, underscoring a deliberate evolution shaped by regional planning priorities and stakeholder collaboration. As early as 1984, initial approvals were granted for a resort-style development under the name Sierra Reflections, featuring a 250-room hotel/casino, and 550-unit condominium complex, a health club, and an 18-hole golf course on land designated as Resort Hotel (later shifted to Tourist Commercial). A subsequent amendment was approved by Washoe County in 1991 to allow a 350-room hotel/casino, 400 condominiums, and the health club and 18-hole golf course. This early phase set the stage for rethinking the site's potential amid shifting land use paradigms. By 2002, during the Truckee Meadows Regional Plan Update, the City of Reno sought to include the property within its Sphere of Influence, prompting an agreement with Washoe County to "down-zone" the area to less intensive residential uses in exchange for retracting the Sphere of Influence boundary—a pivotal step toward aligning the project with sustainable growth objectives.

Building on this momentum, community and regulatory bodies advanced the residential redesign in the mid-2000s. In May 2004, the Galena/Steamboat Citizen Advisory Board unanimously endorsed a Comprehensive Plan Amendment to re-designate the area for residential purposes using the zoning designations that existed prior to the change to Resort Hotel/Tourist Commercial, followed by the Washoe County Planning Commission's 5-2 approval in July 2004, authorizing up to 1,090 dwelling units. Public hearings by the Washoe County Board of County Commissioners in August and September 2004 culminated in the approval of land use designations permitting 995 dwelling units, with the amendment subsequently confirmed as conforming to the Regional Plan by the Truckee Meadows Regional Planning Agency. Infrastructure preparations soon followed, including the Planning Commission's public hearing in August 2005 and the Board's approval in September 2005 for a Special Use Permit to construct a sanitary sewer line essential to Sierra Reflections viability and to benefit St. James's Village to the west of the project. If Sierra Reflections is not developed, St. James's Village will likely never be publicly sewered and hence not completed to the detriment of HOA revenue.

This groundwork paved the way for the project's core milestone in 2006, when the Washoe County Planning Commission unanimously approved Tentative Subdivision Map TM06-001 on May 2, authorizing a 938-lot single-family residential subdivision with common open space, lot sizes averaging 13,722 square feet for detached homes, and 147 attached townhouses (a multi-family format product within the prior plan approval). The Truckee Meadows Regional Planning Commission granted final approval on June 14, 2006, recognizing its regional significance due to the scale of lots. Spanning approximately 759.6 acres across 29 parcels, bordered by Pagni Lane to the north, old US Highway 395 to the east, and extending south to Little Washoe Lake, this map embodied a balanced approach to development that has informed all subsequent iterations.

Recognizing the complexities of implementation, including environmental assessments, infrastructure delays, and economic fluctuations, the project has benefited from a series of development agreements and extensions to maintain its trajectory. In 2008, the Board approved Development Agreement DA08-003, extending the final map filing deadline to June 14, 2009, with further administrative extensions to 2010. Amendments in 2010 and 2014 pushed deadlines to 2014 and 2020, respectively, accommodating ongoing challenges such as geotechnical investigations, jurisdictional determinations for Steamboat and Brown's Creeks, coordination with agencies like the Army Corps of Engineers and Nevada Division of Environmental Protection for permits, and of course, a national financial crisis. By 2020, amid updates presented to the South Truckee Meadows/Washoe Valley Citizen Advisory Board in March, the Board of County Commissioners adopted an amended development agreement in April, extending the deadline to June 14, 2022, and revising conditions to reflect current providers like Truckee Meadows Water Authority and updated fire safety codes.

Recent efforts have continued to adapt the project to emerging needs, with a 2022 ordinance extending the first final map recording to June 14, 2024, to facilitate sewer line construction and water system design. Although Washoe County rejected a final map submittal in May 2022, the Board unanimously reversed this denial on appeal in October 2022, granting 180 days for resubmission plus 60 days for recording, with no public opposition noted. Despite the tentative map's expiration in 2023 without further recordation, these sustained extensions and refinements over more

than two decades illustrate a resilient planning process, poised to deliver a community that harmonizes residential growth with the natural and cultural heritage of the surrounding area.

The comprehensive Planning Commission Staff Report dated January 6, 2026, recommends approval with conditions, supported by substantial evidence from detailed and thorough technical studies, as well as endorsements from relevant regulatory agencies. This considerable documentation demonstrates full conformance with the Washoe County Master Plan, relevant zoning districts, and Development Code.

Despite this robust record, after two and a half hours of public opposition to the project (focused primarily on conformance to the Master Plan) the Planning Commission denied the application citing an inability to make certain findings under Sections 110.608.25 (Tentative Subdivision Maps), 110.810.30 (Special Use Permits), and 110.408.28 (Common Open Space Development).

I. The Substantial Evidence Standard in Land Use Cases

Nevada law mandates that administrative decisions in land use matters be supported by substantial evidence: “that which a reasonable mind might accept as adequate to support a conclusion.” *Stratosphere Corp. v. City of Las Vegas*, 119 Nev. 523, 529, 78 P.3d 522, 529 (2003). Substantial evidence need not be voluminous but can be inferential, such as from the absence of material harm. *Ruggles v. Public Service Comm’n*, 109 Nev. 36, 40, 846 P.2d 299, 302 (1993). And, while agencies may consider community input under ordinances inviting such review, public pressure alone is insufficient if it lacks specificity or overrides substantial contrary evidence. *Stratosphere*, 119 Nev. at 529–30. Put another way, general lay opinions do not suffice to support denial, especially when rebutted by expert evidence. *Reno v. Travelers Hotel, Ltd.*, 100 Nev. 436, 439, 683 P.2d 960, 961 (1984); *Tighe v. Von Goerken*, 108 Nev. 440, 444, 833 P.2d 1135, 1137 (1992).

Here, the Planning Commission’s denial overlooks the objective, evidence-based record in favor of subjective, generalized concerns, constituting an abuse of discretion and rendering the decision arbitrary and capricious. This action ignored the site’s long-standing Suburban Residential zoning in favor of non-regulatory factors, without any staff inquiry or regulatory analysis.

II. Zoning Classifications Control Over Conflicting Master Plan Designations; Denials Without a Legitimate Regulatory Basis Constitute a *Per Se* Regulatory Taking.

In the legal context of land use planning, zoning classifications serve as the controlling legal framework over general master plan designations, ensuring that developments align with enforceable standards while allowing flexibility for innovative projects. Where use designations outline broad intentions for use and density in an area, the zoning actually sets precise permissible activities along with standards for design and development. The Sierra Reflections Tentative Map demonstrates overwhelming compliance with both the master plan’s overarching goals and Washoe County’s specific design standards, as evidenced by its adherence to density limits, environmental protections, and community-oriented features that enhance the region’s long-term sustainability. The primary thrust of the public opposition in this case, however, involves whether the property’s long-established residential zoning or its rural character acknowledged by the Envision Washoe 2040 Master Plan controls the Sierra Reflections capacity to proceed with the project.

A master or general plan serves as a broad, forward-looking blueprint for a county's physical growth. *See* NRS 278.150(1). Counties can establish zoning districts to oversee building, land use, and related activities. NRS 278.250(1). These zoning rules must generally follow the land use master plan, NRS 278.250(2), but counties retain flexibility in applying land use controls or zoning principles as deemed suitable. NRS 278.250(4). The Nevada Supreme Court has repeatedly affirmed that zoning decisions carry a validity presumption, and although master plans deserve respect as guides, they do not impose rigid commands. *See Sustainable Growth Initiative Comm. v. Jumpers, LLC*, 122 Nev. 53, 64, 128 P.3d 452, 460 (2006). Moreover, zoning does not require absolute alignment with every aspect of a master plan. *Id.* at 64-65, 128 P.3d at 461.

The zoning for this site was in effect long before the county adopted its current Master Plan. As far back as 2002, the County endorsed development concepts for the site under Sierra Reflections. A 2004 plan amendment shifted the designation to residential, with the residential zoning allowing 1090 dwelling units, and, after negotiating with the property owner, permitting up to 995 units, followed by the original tentative map approval in 2006 – against the same findings at issue today. Further undermining the Planning Commission's position, this zoning has persisted intact through three versions of the Washoe County comprehensive plan. In fact, the Truckee Meadows Regional Plan has contemplated 1,000 units on the Sierra Reflections property since the 2006 conformance review. Consistent with this stability, the County has repeatedly extended project approvals since 2006, reinforcing the zoning's ongoing legitimacy.

NRS 278.349(3)(e) directs that in evaluating tentative subdivision maps, conformance must be weighed against both zoning and the master plan, but “if any existing zoning ordinance is inconsistent with the master plan, the zoning ordinance takes precedence.” *City of Las Vegas v. 180 Land Co., LLC*, 546 P.3d 1239, 140 Nev. Adv. Op. 29 (2024). This provision ensures that the more specific and legally binding zoning designation cannot be overridden by aspirational master plan goals. The Nevada Supreme Court affirmed this hierarchy in *180 Land Co., LLC*, by holding that denials based on nonconformance with the master plan, without regard for zoning, exceed statutory authority. *Id.* at 1248-50.

When government regulation of private property is so onerous that its effect is tantamount to a direct appropriation or ouster, such action may be a regulatory taking, requiring payment of just compensation under the Fifth Amendment to the United States Constitution. Put more plainly, the Planning Commission denial isn't just administrative error; it's the foundation of a compensable taking because it ignores statutory mandates and allows public sentiment to supplant legal priorities. The Planning Commission's reliance on unsubstantiated public outcry about the master plan – and absolute disregard for the zoning designation – deprives the owner of development rights without due process or compensation, functionally depriving the land of all economically beneficial use.

III. The Technical Documents

In evaluating the Sierra Reflections project, the Planning Commission erred by not prioritizing a comprehensive review of technical documents submitted as part of the application to evaluate the proposed design against the required findings for tentative subdivision map, common open space development, and special use permits needed to develop project infrastructure. The Board of

Commissioners should draw upon these technical documents submitted in support of the Sierra Reflections project in conjunction with County Staff's thorough analysis thereof, using the presentations of staff, the applicant's technical experts, and public comment to guide its review. Relying on this substantial evidence to inform the process will promote a well-supported decision, reinforce the legal hierarchy of planning documents and process, and facilitate approval of the tentative map, ultimately advancing thoughtful development and fair consideration of property interests.

A. The Geotechnical Investigation Report Confirms Site Suitability for the Sierra Reflections Project

The project fully complies with the county's adopted geotechnical standards, addressing seismic, liquefaction, and other hazards in alignment with the Master Plan's Air and Resilience (AR) principles for hazard mitigation and the Designated Critical Area (DCA) Overlay. Westex Consulting Engineers' 2024 Geotechnical Investigation Report and 2025 Supplemental Geophysical Measurements (revised October 2025) are based on site-specific data, including subsurface exploration, geophysical surveys, and rippability assessments, prepared in accordance with the International Building Code (IBC), International Residential Code (IRC), and Northern Nevada Code Amendments adopted by Washoe County.

The Westex reports acknowledge regional risks in the Walker Lane Belt but confirm site suitability through engineered mitigations, such as setbacks from mapped Holocene faults, soil stabilization for expansive soils, and liquefaction countermeasures. The collection of public comments opposed to the project because of geotechnical suitability overgeneralize regional studies without examining site-specific data, while the professional geotechnical reports submitted in support of the application prioritize direct trenching and boring over broad publications, and similar developments in seismic zones demonstrate feasibility with code-compliant design. With over 1,000 regional investigations performed under its care, Westex affirms that risks are mitigable, ensuring stability and safety, and Washoe County Staff agrees. *See* Westex Reports, 2024-2025; Westex Response, 2026.

B. The Remedial Action Plan Prescribes the Most Significant Mitigation of Contaminated Soil Ever Implemented in the Region in Conjunction with Residential Development

The Remedial Action Plan (RAP), prepared by UES for World Properties Inc. and Northern Nevada Public Health (NNPH) in 2025, addresses mercury contamination from historical mining within the Carson River Mercury Superfund Site (CRMS). It includes protocols for site characterization, excavation, beneficial reuse of materials in non-residential areas, an 8-foot clean fill cap, more than double the requirement imposed on similarly situated projects, sampling with 95% Upper Confidence Limit (UCL) calculations, financial assurance bonds, irrevocable non-build easements with environmental covenants, and comprehensive reporting to secure a No Further Action (NFA) determination from NNPH. These measures far exceed the 2006 standards approved with the original tentative map, and align with the Envision Washoe 2040 Master Plan and the 2024 Truckee Meadows Regional Plan (TMRP), which promote sustainable development in Tier 3 Truckee Meadows Service Area (TMSA) lands with potential for Tier 2 amendment to support suburban nodes (TMRP, pp. 82–83).

C. The Hydrology Report Confirms the Engineered Design of Sierra Reflections will Reduce Stormwater Flows Below their Pre-development Levels

The project complies with Washoe County's hydrologic standards, ensuring flood control and water quality protection in alignment with the Master Plan's Natural and Cultural Resources (NCR) principles for water resource management. The 2025 Tentative Hydrology Report by Bowman uses SCS modeling per Truckee Meadows Regional Drainage Manual (TMRDM) guidelines to estimate peak runoff and volumes. The design supported by Washoe County Staff maintains existing drainage patterns, utilizing curb/gutter, catch basins, piping, swales, channels, and detention basins. Post-development 100-year peak stormwater flows are reduced below pre-development levels through detention ponds, with emergency flow paths for excess events. Detention/retention areas are oversized by 30% per county requirements, exceeding calculated needs. This minimizes concentration of flows and ensures no adverse downstream impacts, per NCR Principles 4.1–4.7 (Master Plan, p. 46; Hydrology Report, 2025; p. 6).

D. The Proposed Design Complies with All Applicable Regulatory Requirements Governing Aquatic Resources

The project complies with federal and state regulations for aquatic resources, aligning with the Master Plan's NCR principles for water resource protection and riparian habitat preservation. A 2025 Aquatic Resources Screening by UES identified six aquatic features with an Ordinary High Water Mark (OHWM), including zero non-relatively permanent waters (NRPWs), eight relatively permanent waters (RPWs), and nine presumed Waters of the U.S. (WOTUS) under the 2023 Revised Definition (Conforming Rule post-Sackett v. EPA).

Under the Conforming Rule, WOTUS categories exclude the "significant nexus" test, limiting jurisdiction to traditional navigable waters, impoundments, tributaries meeting RPW standards, and adjacent wetlands with continuous surface connections. Features in Brown's Creek, Steamboat Creek, or with relatively permanent connections are WOTUS, while irrigated fields are likely artificially irrigated wetlands, excluded under exclusion B4.

Proposed disturbances associated with Sierra Reflections intersect WOTUS at only three points: two crossings of Steamboat Creek and one of Brown's Creek. If fill is required below the OHWM, this can be permitted via USACE Nationwide Permit 14 for Linear Transportation Projects, with potential Nevada Department of Environmental Protection (NDEP) Section 401 Water Quality Certification. Nevada's broader Waters of the State (WOTS) definition may apply, but the clustered design of the project minimizes impacts by avoiding most features, with 61.6% open space buffering riparian areas. These measures exceed 2006 standards, ensuring no significant risks to water quality or habitats, per NCR Principles 4.1–4.7 (Master Plan, p. 46; UES Screening Report, 2025).

E. Existing Cultural Resources are Preserved by the Proposed Project Design

Sierra Reflections fully addresses cultural resources in alignment with the Master Plan's NCR principles, emphasizing preservation and responsible development. A 2024 review by Kautz Environmental Consultants confirms that the entire project area, except for a small 3.6-acre sliver in

the far southwest corner (entirely within preserved open space and distant from developed areas), has been inventoried for cultural resources through 15 prior studies conducted between 1981 and 2012. This unsurveyed portion may result from a geo-referencing error in pre-2000 surveys and poses no impact to the project, as it is not proposed for development.

Of the 71 documented sites (primarily prehistoric lithic scatters and isolated artifacts, with some historic features like refuse scatters and a Virginia & Truckee Railroad segment) all eligible sites under the National Register of Historic Places (NRHP) have been fully mitigated, as affirmed by the Nevada State Historic Preservation Office (SHPO) in a 2006 letter stating that “all of the regionally-significant sites in the current project area have been adequately mitigated and no additional work is needed.” Ineligible sites require no further consideration.

No previously identified Traditional Cultural Properties (TCPs) or areas of Tribal concern are within the project boundaries, based on ethnographic reviews. Brown’s Creek, traversing the site, holds no documented significance. As the project is not a federal undertaking, it does not trigger Section 106 of the National Historic Preservation Act, but these measures ensure conformance with NCR Principles for cultural resource protection (Master Plan, pp. 45–47; Kautz Report, 2024; SHPO Letter, 2006).

F. With the Prescribed Roadway Improvements in Place, Sierra Reflections Produces no Negative Impact on Local Traffic

The project satisfies Washoe County’s adopted transportation standards, minimizing impacts through efficient design and aligning with the Master Plan’s Transportation and Roads (TR) principles for safe, multi-modal access. The 2024 Traffic Impact Study by Headway Transportation analyzes existing conditions, project-generated volumes (including St. James’s Village integration), and recommends multilane roundabouts at St. James Parkway / US 395A and Eastlake Boulevard / US 395A.¹

Phase 1 (8 one-acre lots) generates minimal trips (e.g., 4/1 AM inbound/outbound at Pagni Lane), requiring no improvements. Build-out (940 units) produces 8,864 daily trips, with intersections operating at LOS B (v/c 0.60) and LOS A (v/c 0.42) under future-plus-project conditions, no signal warrants met, and minimal queuing. Internal roadways classify as collectors (>2,000 vpd) or locals, with traffic management, lanes, and phasing recommendations.

This assures compatibility with regional networks, as required by TR Principle 1.2. (Traffic Study, 2024; pp. 25, 36, 49). The project will pay standard Regional Road Impact Fees (RRIF) of

¹ To support construction of the I-580 freeway through Washoe Valley, NDOT used eminent domain to acquire right-of-way, impacting the original St. James Village master-planned community. This acquisition eliminated several lots and isolated about 224 acres east of the highway due to barriers like concrete dividers and wide shoulders. Owned by World Properties, Inc., which also controls adjacent Sierra Reflections, these parcels were removed from the St. James’s Village tentative map via amendment of conditions WAC25-0010. This amendment dropped the lot count in St. James’s Village from 510 to 450 and permanently split Sierra Reflections from St. James’s Village.

approximately \$4.70 million (based on the number of units proposed and the current fee schedule) as mitigation for its impacts on the regional roadway network.

G. The Project Generates Significant Revenue to Washoe County and the Truckee Meadows Fire Protection District, Directly Supporting Provision of Municipal Services

The project demonstrates positive fiscal impacts, aligning with the Master Plan's Public Facilities and Services (PFS) principles for efficient growth and financial sustainability. The 2022 Fiscal Impact Analysis by EKAY Economic Consultants included with the application evaluates a similar 938-unit configuration over six years, projecting net revenues to Washoe County and the Truckee Meadows Fire Protection District (TMFPD) over 20 years.

Using marginal cost methodology, the FIA estimates \$85,501,642 in revenues against \$67,639,478 in costs for Washoe County funds, yielding a \$17,862,163 surplus over the review period. The General Fund alone shows a \$14,126,462 surplus. For TMFPD, revenues of \$5,594,607 exceed costs of \$3,713,860, resulting in a \$1,880,747 surplus. This conservative analysis (due to current clustering reducing costs) confirms that in the case of both the county and TMFPD, revenue generated by the development better than funds required services without burdening existing taxpayers. PFS Principle 2.1 (Master Plan, p. 108; FIA, 2022; pp. i, 5-8; Tables 1-5). Rural Washoe areas, where only 11 of 59 communities remain affordable at median income levels, need "right-fit" developments like Sierra Reflections to attract investment without overwhelming infrastructure.

IV. The Acute Housing Supply Crisis in Washoe County Demands Immediate Action

This project, which involves constructing a broad mix of 940 market-rate homes tailored to the value and character of the surrounding community, represents a critical step toward alleviating the severe housing supply shortage plaguing our region. Denying such developments only perpetuates affordability challenges, stifles economic growth, and hinders upward mobility for residents.

Washoe County is at the epicenter of Nevada's housing shortfall, where inventory remains persistently, alarmingly constrained. This shortage has profound economic repercussions. Homebuyers in Washoe devote 48.4% of average wages to housing costs, pushing the affordability index to a dismal 63. Aging housing stock and zoning restrictions limit development options, exacerbating these issues.

Critics may argue that Sierra Reflections' market-rate homes do not directly address affordability for lower-income groups. However, the economics of housing irrefutably demonstrates that adding supply in nearly any segment of the market creates a "filtering" effect, where existing residents move up the housing ladder, vacating more affordable units for others. In regions with constrained supply, new market-rate construction reduces competition for older, lower-cost stock, effectively increasing affordability across segments. For instance, nearly all economic analysis of the housing crisis concludes that boosting supply in high-growth areas like Washoe tempers rent growth, benefiting the most vulnerable by easing market pressures.

Sierra Reflections aligns with this model. By introducing homes that reflect the premium value of the Washoe Valley area, potentially attracting middle- and upper-middle-income buyers, the project facilitates upward mobility for current residents in entry-level or mid-tier housing. This, in turn, frees up units for first-time buyers, renters transitioning to ownership, and workforce families.

The Sierra Reflections project exemplifies responsible development, supported by substantial evidence. The Planning Commission's denial, driven by unsubstantiated opposition rather than regulatory criteria, is arbitrary and legally unsupportable. Re-approving the Sierra Reflections Tentative Map on appeal is not just sound economics – it's essential policy. By expanding supply through market-rate homes, Washoe County can foster upward mobility, unlock affordable options, and build a more equitable housing market. Following a *de novo* review that recognizes the project's long-standing zoning classification and alignment with regional needs, the Board of County Commissioners should exercise its option to reverse the Planning Commission's action and approve the revised Sierra Reflections tentative map.

Very truly yours,



Douglas R. Thornley
Of Counsel
for Holland & Hart LLP