

5 COMMENTS AND RESPONSES

This chapter includes a reproduction of, and responses to, each letter received during the public review period. Each letter is reproduced in its entirety, and is immediately followed by responses to the comments in it. Letters follow the same order as listed in Chapter 4 of this Final EIR and are categorized by:

- ◆ State and Regional Agencies
- ◆ Businesses, Non-Profit Groups and Associations
- ◆ Members of the Public

Each comment and response is labeled with a reference number in the margin. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response required revisions to the Draft EIR, these revisions are shown in Chapter 3 of this Final EIR document.



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

July 3, 2006

LETTER #1

RECEIVED

Duane Hall
City of Truckee
10183 Truckee Airport Road
Truckee, CA 96161

Subject: Truckee 2025 General Plan
SCH#: 2004032092

Dear Duane Hall:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 30, 2006, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

1-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2004032092
Project Title Truckee 2025 General Plan
Lead Agency Truckee, City of

Type EIR Draft EIR
Description An update to the Town's first General Plan, which was adopted in 1996. Does not include the mandatory update to the Housing Element, which was adopted in 2005. There will be two new elements added to the General Plan: Community Character and Economic Development.

Lead Agency Contact

Name Duane Hall
Agency City of Truckee
Phone 530 582-7820 **Fax**
email
Address 10183 Truckee Airport Road
City Truckee **State** CA **Zip** 96161

Project Location

County Nevada
City Truckee
Region

Cross Streets

Parcel No.
Township

Range **Section** **Base**

Proximity to:

Highways 80,267,89
Airports Tahoe Truckee
Railways Union Pacific
Waterways Donner Lake, Truckee River
Schools Tahoe Truckee Unified
Land Use Municipality consisting of residential, commercial, industrial, and institutional uses/VariouS/VariouS

1-1

Project Issues Drainage/Absorption; Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Department of Forestry and Fire Protection; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 3; Department of Housing and Community Development; Department of Health Services; Native American Heritage Commission; State Lands Commission; Regional Water Quality Control Bd., Region 6 (So Lake Tahoe)

Date Received 05/17/2006 **Start of Review** 05/17/2006 **End of Review** 06/30/2006

LETTER 1: Terry Roberts, Director, State Clearinghouse, State of California, Governor's Office of Planning and Research. July 3, 2005.

1-1: This comment acknowledges that the State Clearinghouse has received the Draft EIR and has circulated copies of the documents to selected State agencies for review. The letter further states that the Town of Truckee has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. No further response is necessary.

NORTHERN SIERRA AIR QUALITY MANAGEMENT DISTRICT

Gretchen Bennett, APCO

DISTRICT HEADQUARTERS

200 Litton Drive, Suite 320
P.O. Box 2509
Grass Valley, CA 95945
(530) 274-9360 / FAX: (530) 274-7546
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TRUCKEE FIELD OFFICE

13450 Donner Pass Rd., Ste. B, Truckee, CA 96161
Mailing Address: P.O. Box 9766, Truckee, CA 96162
(530) 550-7872 / FAX: (530) 587-2623
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QUINCY FIELD OFFICE

270 County Hospital Road, Suite 127
P.O. Box 3981, Quincy, CA 95971
(530) 283-4654 / FAX: (530) 283-0699
email: george@myairdistrict.com

LETTER #2

July 6, 2006

Town of Truckee
Truckee Community Development Dept.
Attn: Duane Hall, Town Planner
10183 Truckee Airport Road
Truckee, California 96161

Re: Town of Truckee 2025 General Plan Draft Environmental Impact Report

Dear Mr. Hall:

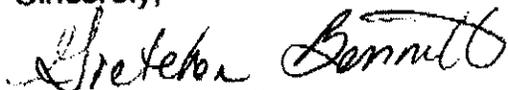
The Northern Sierra Air Quality Management District (District) has reviewed the planning documents for the referenced plan and would like to submit the following *commenting agency comments* for the official record.

The District recommends the Town of Truckee 2025 General Plan further address residential open burning. Although residential open burning provides a minor contribution to regional particulate matter pollution, the health impact to residents near backyard burning can be significant. As the Town of Truckee's population continues to increase, residential open burning will become a bigger health issue.

The District recommends that the Town of Truckee implement a green waste collection service to provide an alternative to residential open burning of vegetation. Once a green waste program has been adopted, the District recommends that the Town prohibit residential open burning in densely populated areas.

Please feel free to contact Ryan Murano of my staff at 530-550-7872 if you have any questions or comments

Sincerely,



Gretchen Bennett
Air Pollution Control Officer

2-1

LETTER 2: Gretchen Bennett, Air Pollution Control Officer. Northern Sierra Air Quality Management District. July 6, 2006.

- 2-1: This comment suggests that the Town may want to add more specificity to the proposed 2025 General Plan regarding residential open burning of yard and green waste. Additionally, the commentor recommends the Town implement a green waste collection service to provide an alternative to residential open burning of vegetation. The comment does not suggest that the Draft EIR is inadequate in either case for not including this information. No additional change to the Draft EIR is necessary. Despite this, the Town of Truckee notes the comments and prior to the adoption of the proposed 2025 General Plan may consider the inclusion of additional policies in the General Plan to address residential open burning and green waste collection.

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

**LETTER #3**

MAY 31 2006

May 24, 2006

Duane Hall
Town of Truckee
10183 Truckee Airport Rd.
Truckee, CA 96161

Dear Mr. Hall:

Re: SCH #2004032092; Truckee 2005 General Plan

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the rail corridor in the County be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the County.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kevin Boles".

Kevin Boles
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection and Safety Division

cc: Jim Smith, UP
Carol Harris, UP

3-1

LETTER 3: Kevin Boles, Utilities Engineer, Rail Crossings Engineering Section Consumer Protection and Safety Division. State of California, Public Utilities Commission. May 24, 2006.

- 3-1: This comment includes various recommendations related to ensuring safety with regard to rail corridors, particularly with regard to increased traffic and pedestrian activity. Currently, the proposed 2025 General Plan, Goal CIR-12, P12.2 does require the community to work with the Union Pacific rail lines to address issues associated with railroad operations. The specifics of these issues will be addressed on a project by project basis in accordance with this General Plan policy. The comment addresses the proposed 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.



California Regional Water Quality Control Board Lahontan Region



Linda S. Adams
Secretary for Environmental
Protection

2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150
(530) 542-5400 • Fax (530) 544-2271
<http://www.waterboards.ca.gov/lahontan>

Arnold Schwarzenegger
Governor

JUL 11 2006

REC'D JUL 12 2006

LETTER #4

Duane Hall, Town Planner
Truckee Community Development Department
10183 Truckee Airport Road
Truckee, CA 96161

COMMENTS ON THE DRAFT TRUCKEE 2025 GENERAL PLAN AND ENVIRONMENTAL IMPACT REPORT, NEVADA COUNTY

California Water Quality Control Board, Lahontan Region (Water Board) staff have reviewed the draft Truckee 2025 General Plan and its accompanying draft Environmental Impact Report (EIR). We understand this is the first update of the first General Plan, adopted in 1996. Given the rapid development within the Town of Truckee limits, comprehensive community planning is essential to protecting environmental resources.

4-1

The Regional Board is a responsible agency pursuant to the California Environmental Quality Act (CEQA) for this plan. We have reviewed all information submitted with regards to water quality and have the following comments:

Water Quality Impact

The draft EIR states that proposed and existing policies and mitigation measures are sufficient to reduce development impacts to *less than significant* levels. While the draft General Plan and draft EIR describe a number of activities to promote water quality protection, the documents do not describe specific metrics or standards to ensure water quality protection. Without programs to assess the effectiveness of water quality protection policies and measures, it is inappropriate to find that such activities will reduce development impacts to less than significant levels. A finding of *potentially significant unless mitigation incorporation* would more accurately reflect the uncertainty associated with Truckee's proposed mitigation measures.

4-2

Water Quality Monitoring

Both the draft General Plan and Draft EIR describe ongoing reliance on community and non-profit organizations to conduct water quality monitoring to assess environmental impacts associated with new development. The documents also discuss requiring developers to evaluate water quality impacts and mitigate accordingly. These measures do not adequately allow the Town of Truckee to assess development impacts, nor do they provide sufficient information regarding mitigation measure effectiveness. The General Plan should include a detailed monitoring plan to evaluate

4-3

receiving water quality trends as well as assess urban runoff conditions. We recommend the Town develop and implement a comprehensive monitoring program to evaluate chemical, hydrologic, and biological impacts to water resources within your jurisdiction. Placer County is developing such and plan and your concurrent participation may provide the most effective means to evaluate long term watershed health.

4-3

Water Quality Mitigation

The EIR must specify water quality thresholds or other defined criteria to determine when environmental contingency measures will be required. Once measurable adverse affects have been noted, it is difficult to reverse those trends. The EIR must evaluate contingency measures and assess their ability to improve or restore water quality to identified levels. The EIR should also discuss historically disturbed areas that could offer restoration opportunity to offset the impact of new development.

4-4

4-5

Low Impact Development

While the draft General Plan includes a variety of policies to preserve open space and conserve natural resources, there is no language to encourage the use of Low Impact Development methods. The General Plan should encourage Low Impact Development methods to achieve conservation and preservation goals. For more information on Low Impact Development tools, visit the Environmental Protection Agency web site: <http://www.epa.gov/nps/lid/>.

4-6

Thank you for the opportunity to comment on the draft General Plan and EIR. If you have any questions or comments regarding this matter please contact me at (530) 542-5439 or Alan Miller, North Lahontan Regulatory Unit Chief



Robert Larsen
Environmental Scientist

BL/didT:/TruckeeGeneralPlan.ceqacomment.doc

LETTER 4: Robert Larsen, Environmental Scientist. State of California, Regional Water Quality Control Board, Lahontan Region. Received July 11, 2006.

- 4-1: This comment is an introduction to the comments that follow. It notes that the Regional Water Quality Control Board (RWQCB) has reviewed the proposed 2025 General Plan, and the Draft EIR. It also affirms that the RWQCB is a responsible agency pursuant to the California Environmental Quality Act (CEQA). Since no substantive comments are contained in this portion of the comment letter, no response is required.
- 4-2: The commentator recommends the proposed 2025 General Plan and Draft EIR include specific metrics and standards to ensure water quality protection. Chapter 4.7 of the Draft EIR includes discussion of the proposed 2025 General Plan's various goals, policies and actions that seek to protect and improve water quality, finding that these would reduce any potential impact to a *less than significant* level. Specifically, Policies P11.2, P11.5 and P11.6, under Goal COS-11, all adequately address the need for maintaining current water quality protection standards. The proposed 2025 General Plan and Draft EIR documents purposely do not contain specific metrics and standards as they are broad based program level documents intended to be valid for the next twenty years. The wording of the proposed 2025 General Plan policies concerning water quality standards is intended to ensure that the Town of Truckee will work constantly with the proper resource agencies, now and in the future, to maintain the most current standards and management practices in water quality protection. Specific metrics and standards are best addressed upon implementation of Policy 11.5 and Action 11.5 and on a site-by-site or project-by-project determination in accordance with the policies and actions defined by the proposed 2025 General Plan. For these reasons, the proposed 2025 General Plan and Draft EIR are

adequate as stated. No additional change to the Draft EIR is required.

- 4-3: The commentor recommends the proposed 2025 General Plan include a detailed water quality monitoring plan, and that the Town should develop and implement a comprehensive plan or participate concurrently with Placer County's water quality monitoring efforts. Chapter 4.7 of the Draft EIR includes discussion of the proposed 2025 General Plan's various goals, policies and actions that seek to protect and improve water quality, finding that these would reduce any potential impact to a *less than significant* level. Specifically, Policies P11.2, P11.5 and P11.6, under Goal COS-11, all adequately address the need for maintaining current water quality protection standards. The proposed 2025 General Plan and Draft EIR documents purposely do not contain detailed water quality monitoring plans as they are broad based program level documents intended to be valid for the next twenty years. Specific water quality monitoring plans are best addressed on a site-by-site or a project-by-project determination in accordance with the policies defined by the proposed 2025 General Plan. These policies require adherence to the Best Management Practices (BMP's) defined by the RWQCB standards. For example, Action 11.5 will require a joint plan/program to monitor water quality. Additionally, these project level review will be pursuant to CEQA standards and may include specific mitigation measures. For these reasons, the proposed 2025 General Plan and Draft EIR are adequate as stated. No additional change to the Draft EIR is required.
- 4-4: The commentor recommends the Draft EIR include specific water quality thresholds to determine when environmental contingency measures will be required. The Draft EIR does not discuss specific water quality thresholds as this is a broad based program level documents intended to be valid for the next twenty years. Under the proposed 2025 General Plan, the Town of Truckee is required to work

with the proper resource agencies to maintain the most current standards and management practices in water quality protection. Specific water quality thresholds are best addressed on site-by-site or project-by-project determination (including project level environmental review as required by CEQA) in accordance with the policies and actions defined by the proposed 2025 General Plan under Goal COS-11. For these reasons, the Draft EIR is adequate as stated. No additional change to the Draft EIR is required. Nonetheless, the comment is duly noted, and the Town may consider adding further policies to the proposed 2025 General Plan prior to its adoption. These additional policies might call for the adoption of thresholds similar to those suggested by the commentor.

- 4-5: The comment suggests that the Draft EIR should identify specific areas that might be used to provided off-site mitigation opportunities. CEQA does not require the identification of such potential mitigation sites, nor would the identification of such sites be appropriate for the Draft EIR’s program level assessment. No changes are needed to the Draft EIR.
- 4-6: The commentor recommends the proposed 2025 General Plan include language that encourages the use of Low Impact Development Standards set out by the Environmental Protection Agency (EPA). The comment does not address the adequacy of the Draft EIR, so no additional change to the Draft EIR is required. Nonetheless, the comment is duly noted, and the Town may consider adding further policies to the proposed 2025 General Plan prior to its adoption. These additional policies might call for the adoption of thresholds similar to those suggested by the commentor.

DEPARTMENT OF TRANSPORTATION
DISTRICT 3, SACRAMENTO AREA OFFICE – MS 15
P. O. BOX 942874
SACRAMENTO, CA 94274-0001
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TTY (530) 741-4509



*Flex your power!
Be energy efficient!*

LETTER #5

June 30, 2006

06NEV0011
03-NEV
Truckee 2025 General Plan
SCH#004032092

RECEIVED

JUL 05 2006

Mr. Duane Hall
Town of Truckee
10183 Truckee Airport Road
Truckee, CA 96161

Dear Hall:

Thank you for the opportunity to review and comment on Truckee 2025 General Plan. Our comments are as follows:

Page 1-12: It is unclear why Caltrans was not involved with Phase II of the Update process. Since several State Highways are arterials within the Town, serving many local trips as well as regional trips, earlier involvement by Caltrans would have avoided some of the following comments.

5-1

Page 1-21: Since it was assumed that 46% of the homes in Truckee will be vacation homes, this means that traffic demands on weekends during the peak month could be almost twice as high as on weekdays. The Traffic and Circulation section of the DEIR only addresses the future volumes and LOS on summer weekdays. Although using the same LOS standard on weekends as are used on weekdays may be "excessive", analysis of weekend traffic volumes should be provided in this EIR, and in traffic studies for proposed developments. Using the TRPA standard of LOS "E", for no more than 4 hours per day, would be acceptable for the highways in this area. This is consistent with Goal ED-5, to promote Truckee's role as a year-round tourist destination. Many tourists will avoid areas that are congested.

5-2

Page 2-31: Policy PC3-P3 is not acceptable to Caltrans. The 267 Bypass was constructed as an expressway, and all access rights were acquired. No additional access to this highway should be assumed.

5-3

Page 4-3: The potential for increased congestion at future peak times is discussed. Eliminating congestion during storms is probably not possible, so we support the proposed strategy to provide alternate travel routes for local circulation for these conditions.

5-4

Figure CIR-1: It should be noted that the Year 2004 Peak Month ADT for SR 267 at the Placer County line was 16,000, not 13,240.

5-5

7/3/2006
Mr. Hall
Page 2

Table CIR-5: Intersection #14 should be described with the construction of a loop on-ramp as part of the future improvements. This interchange was designed to allow for this future ramp. 5-6

2025 General Plan EIR

Appendix A : A copy of this appendix should be sent to Caltrans for review. Caltrans' comments on this DEIR should not be considered complete until we have had a chance to review this appendix. 5-7

Table 3-4: Intersection #14 should be described with the construction of a loop on-ramp as part of the future improvements. This interchange was designed to allow for this future ramp. 5-8

Figure 4.12-1: This figure should list the year that the volumes represent, and whether they are for the peak month. One of the volumes shown near the west end appears to be pointing to I-80, but it should point to Donner Pass Road. 5-9

Table 4.12-5: The volume thresholds shown for highways are not realistic. These lane volumes are higher than occur on I-80 at peak times, just before it reaches capacity. The only place in this area that comes close to these volumes is for NB traffic at the "Mousehole" on SR 89. This is because there is a single lane for only a short distance, with 2 lanes on either side. This funnel effect increases the capacity of that single lane, but it is not possible to maintain these flows for longer one-lane per direction segments. Using the arterial volume thresholds that are shown would be acceptable. 5-10

Table 4.12-9: For SR 267 just south of I-80, the future ADT is listed as 38,490. It is not possible to maintain an acceptable LOS on a 2-lane highway with this volume of traffic. Four lanes will be necessary for this level of traffic demand. It should be noted that the future ADT just south of the Placer County line is listed as 41,350, which is less than 10% more, but this section is proposed to be widened to 4 lanes. The difference is that Placer County's standards were applied, instead of the unrealistic standard that was used for highways within the Town of Truckee. Four lanes will be needed, all the way to I-80, unless the future traffic demands can be greatly reduced. 5-11

Table 4.2-10: The SR 89/ West River Street intersection will be improved along with the "Mousehole" project, to provide 2 SB lanes through the intersection, and this should be noted. 5-12

Table 4.2-10: #18 - The WB ramp intersection at the SR 267/80 interchange should be listed with a future loop on-ramp as part of the improvements.

Please provide our office with copies of any further action pertaining to this project. If you have any questions regarding these comments, please contact Ann Marie Robinson at 916.274.0641.

Sincerely,


MARLO TINNEY, Chief
Office of Transportation Planning-East

LETTER 5: Marlo Tinney, Chief, Office of Transportation Planning-East. State of California Department of Transportation. June 30, 2006.

- 5-1: This comment questions why Caltrans was not involved with the later phases of the 2025 General Plan update process. To the extent that notification and consultation is required by CEQA and State law, Caltrans was informed of the process to develop the 2025 General Plan and the Draft EIR. Since this is not a comment on the adequacy of the Draft EIR, no further response is necessary.
- 5-2: The comment states that the Traffic and Circulation section of the Draft EIR only addresses the future volumes and Level of Service (LOS) on summer weekdays, noting that traffic on weekends may be much higher due to the large proportion of seasonal vacation homes found in Truckee.

The traffic and circulation section of the Draft EIR appropriately focuses on traffic conditions during summer weekdays, since it is the Town of Truckee's standard to design for those summer weekday conditions. More specifically, the traffic analysis analyzes the 10th-highest summer PM peak hour. A review of count data collected the summer of 2003 indicates the following:

- ◆ Traffic data collected along Donner Pass Road (DPR) immediately west of Meadow Way (Friday, July 18, 2003 to Wednesday, September 24, 2003) indicates that of the days on which the 30 highest peak-hour volumes occurred, the most (9) occurred on a Friday.
- ◆ Summer hourly count data along SR 267 immediately north of Northstar Drive (Tuesday, July 8, 2003 to Tuesday, July 15, 2003) provided by Caltrans indicates the peak hour along SR 267 occurs on Fridays from 4:00 PM to 5:00 PM. The same is true of data collected by Caltrans for the same time period along SR 89 immediately north of Squaw Valley Road.

It can be determined from this data that the peak-hour condition occurs most consistently on Fridays, and not on the weekend. Fur-

thermore, it is standard engineering practice for the design period to reflect a busy, but not absolute peak day in order to ensure that roadway improvements are not constructed that are needed for only a few days or hours per year. Therefore, the model reflects the 10th-highest summer PM peak-hour volume as the design period. Please see Draft EIR Appendix A: Truckee General Plan Traffic Analyses Technical Appendices (page 34, and Sub-Appendix A) for additional detail on the methodology used. Since the assumptions and methodology of the traffic analysis remain valid, no changes are needed to the Draft EIR.

- 5-3: The comment states that Policy PC3-P3 of the proposed 2025 General Plan is not acceptable to Caltrans, since the 267 Bypass was constructed as an expressway, and all access rights were acquired.

It should be noted that the traffic modeling did not assume that any additional access to Highway 267 would occur, and so no changes to the findings of the Draft EIR are needed. However, the commentator is correct to note that the wording of Policy PC-3 P3 could be taken to imply that new access to the Bypass might be allowed. The wording of this policy will be amended prior to adoption of the proposed 2025 General Plan to clarify that direct access to the Highway 267 Bypass would not be permitted.

- 5-4: The comment agrees with the proposed 2025 General Plan's proposed strategy to provide alternate travel routes for local circulation during storms. Comment noted.

- 5-5: The comment notes an inaccuracy in Figure CIR-1 of the proposed 2025 General Plan, which is also included as Figure 4.12-1 in the Draft EIR. The commentator correctly notes that Year 2004 Peak Month ADT for SR 267 at the Placer County line was 16,000, not 13,240 as shown in the figure. Figure 4.12-1 has been amended accordingly, as is shown in Chapter 3 of this Final EIR. Figure CIR-1

will be similarly amended prior to adoption of the proposed 2025 General Plan. This change does not affect the analysis of findings of the Draft EIR.

- 5-6: The comment suggests that in Intersection #14 (SR 89/SR 267/I-80) westbound in Table CIR-5 in the proposed 2025 General Plan should be described with the construction of a loop on-ramp as part of the future improvements. The information from Table CIR-5 is reproduced in Table 3-4 in the Draft EIR.

The Town of Truckee agrees with the suggested revision: the construction of a loop to accommodate vehicles traveling in the northbound direction to I-80 westbound would also mitigate LOS at the SR 267/I-80 Westbound intersection to LOS D, and would avoid the need for an additional northbound left-turn lane and southbound through lane. Table 3-4 in the Draft EIR has been revised accordingly, as shown in Chapter 3 of this Final EIR, and Table CIR-5 will be similarly revised prior to adoption of the 2025 General Plan.

- 5-7: The comment requests that a copy of Draft EIR Appendix A should be sent to Caltrans for review, and notes that Caltrans' comments on the Draft EIR should not be considered complete until the agency has had a chance to review this appendix.

The appendix has been submitted to Caltrans as requested. No additional comments were received as of the date of publication of this Final EIR.

- 5-8: See response to comment 5-6.

- 5-9: The comment suggests that Figure 4.12-1 in the Draft EIR should list the year that the volumes represent, and whether they are for the peak month. It further notes that one of the volumes shown near

the west end appears to be pointing to I-80, but should be pointing to Donner Pass Road.

The comment is noted. The figure has been revised as suggested, and as shown in Chapter 3 of this Final EIR.

- 5-10: The comment suggests that the volume thresholds for highways as indicated in Draft EIR Table 4.12-5 are unrealistically high. The commentor provides several arguments to support this assertion, and notes that use of the arterial volume thresholds that are shown, rather than the highway volumes shown, would be acceptable.

Contrary to the commentor's suggestion that the volumes shown not realistic for the Truckee area, roadway geometry along SR 267 is in fact close to optimal, with no intervening intersections, relatively flat terrain, and limited bike and pedestrian activity. Furthermore, I-80 is not a good indication of capacity, as traffic on I-80 consists of roughly 18 percent truck traffic, with over 5,500 trucks per day and mountainous grades.

The 1,890 vehicles per hour per lane capacity used in the Draft EIR was based upon the findings of the Nevada County LOS Criteria Study (Prism Engineering, December 7, 2000) which concluded that under certain circumstance the Highway Capacity Manual (HCM) methodologies for two-lane highways is not applicable. This conclusion was drawn by comparing the calculated LOS using the HCM methodologies to the observed LOS along 16 locations in Nevada County. In some cases the observed capacity was a LOS A/B (based upon travel speed), while the calculated LOS was LOS E. This is mostly due to the fact that the HCM conservatively assumes a 5-second vehicle headway. Observations made by Prism Engineering suggest actual vehicle headways are less than 2 seconds. It should be noted that the two-lane highway methodology contained in the HCM is currently being updated, thereby recognizing its faults. It

should further be noted that Exhibit 8-22 of the 2000 HCM¹ identifies several rural two lane highways in the United states that currently accommodate over 1,800 vehicles per hour per lane (Madera-Olsen Road in Simi Valley, California, Highway 4 in Contra Costa, California, and Midtown Tunnel in Norfolk/Portsmouth, Virginia).

Since the analysis and findings of the DEIR are valid, no changes are needed.

- 5-11: This comment suggests that, contrary to the information shown in Table 4.12-9 of the DEIR, an acceptable Level of Service could not be maintained on SR 267 just south of I-80 if it to were remain at two lanes, and that four lanes would be necessary for the projected level of traffic demand. The comment further notes that Placer County standards, which are more stringent, are applied to the section of SR 267 south of the Placer County line, and that this section is proposed to be at four lanes, despite the fact that only a small additional amount of traffic is projected for this section.

In the opinion of the Town Engineer and LSC Transportation Consultants, who developed the Draft EIR traffic analysis, ADT is not a good measure of roadway capacity, since it depends on hourly variation in traffic volume. In addition, although Placer County's traffic volumes are more stringent than the Town of Truckee's, as stated in response 5-10, above a capacity of 1,890 vehicles per hour per lane has been identified, and is determined to be appropriate in defining the capacity of this section of SR 267. Since the analysis and findings of the DEIR are valid, no changes are needed.

¹ Highway Capacity Manual. Transportation Research Board. 2000.

- 5-12: The comment correctly notes two additional improvements to the roadway network that should be reflected in the “Mitigation” column of Table 4.12-10 in the Draft EIR (NB: the comment’s reference to Table 4.2-10 is assumed to have been made in error, since that table does not pertain to the EIR traffic analysis). Table 4.12-10 has been amended as suggested to reflect the following changes:
- ◆ The SR 89/West River Street intersection will be improved along with the “Mousehole” project, to provide 2 SB lanes through the intersection,.
 - ◆ The WB ramp intersection at the SR 267/80 interchange should be listed with a future loop on-ramp as part of the improvements.

The amended table is included in Chapter 3 of this Final EIR.



Planning tomorrow.
Together.

July 6, 2006

Hand Delivered and emailed
info@truckee2025.org

Received By
Planning Division

JUL 07 2006

LETTER #6

Attn: Mr. Duane Hall, Town Planner
Town of Truckee Community Development Department
10183 Truckee Airport Road
Truckee, CA 96161

Re: Comments on the Town of Truckee 2025 General Plan Draft
Environmental Impact Report

Dear Mr. Hall,

These comments are submitted by Mountain Area Preservation Foundation (MAPF). Founded in 1988, MAPF is among the Sierra's leading land conservation and community planning non-profit organizations. MAPF has participated in the Town's General Plan update process since it was initiated. Members of MAPF have provided comments on the early draft policies in the proposed General Plan. We appreciate the hard work that has been done on the proposed Truckee 2025 General Plan (DGP) and this opportunity to comment on the Draft Environmental Impact Report (DEIR).

The *purpose* of our letter is to provide constructive comments to the Town of Truckee on the DEIR for the DGP. MAPF will be providing more detailed policy recommendations under separate cover in August when the Planning Commission is scheduled to hold hearings on the DGP. While the DGP contains numerous cutting edge policies directed at balancing future growth and development with protection of the Town and region's considerable natural, historic and aesthetic resources, there is more work to be done to protect those resources and to achieve a world class General Plan to guide Truckee's future.

MAPF acknowledges that the DGP is a forward thinking and progressive document that seeks to address many of the difficult land use, housing, transportation and infrastructure challenges facing the town. The DGP is a

6-1

dramatic improvement over the existing General Plan and reflects a sincere effort on the part of the Town, its staff and contractors, and elected officials to craft a GP that proactively guides change. MAPF particularly applauds the inclusion of the Economic Development and Community Character Elements of the DGP, which are innovative inclusions to the required elements, and provide valuable refinement and policy direction.

Exemplary policies proposed in the DGP that reflect community input include: requiring minimum densities to be fulfilled in new residential development; improved bike and pedestrian access; and setbacks from floodplains among other provisions. The review period for the DEIR and General Plan provides an important opportunity to improve the Plan even further. During this period, MAPF proposes to work with the Town to build on the policy themes already included in the proposed DGP. These policy themes can be refined and tied together in a *Community Benefits Funding Package* that includes as its centerpiece provision an opportunity for targeted density increases in key locations along transportation corridors and near downtown in exchange for community benefit considerations including additional affordable housing, open space and transportation improvements.¹ For example, the DGP proposes Transfer of Development Rights and Overlay policies. MAPF is proposing that these and other policies be improved and refined to actually achieve the important community outcomes of:

6-1

- Protecting community and regional open space;
- Building housing that is affordable to the Truckee community;
- Enhancing existing neighborhoods and building new, vibrant and walkable neighborhoods in the existing City Limits and efficiently utilizing the Town's infill potential;
- Ensuring that there is no loss of residential units where there is mixed use zoning
- Improving and expanding transportation choices; and
- Providing funding for these outcomes to be implemented and realized.

MAPF will be submitting more detailed policy suggestions by August when the Planning Commission begins its hearing on the DGP. This letter outlines the *concepts* for policy revisions to achieve these important community benefits goals, including:

- A Community Benefits Overlay Policy
- Transfer of Development Rights Program
- Regional Open Space Protection Program
- City – County Agreements related to Development in the Town's Planning Area, housing and regional open space protection

¹ In return for exercising the option for increased densities, the landowner voluntarily funds or provides a range of community benefits. This approach allows the Town residents to **share** in the windfall profits that accrue from increasing land use density and intensity.

- Among other policies and programs needed to achieve community benefit outcomes.

We hope the Town Staff and its Consultants on the DGP and EIR will join us in further refining the DGP so that it will actually achieve these important outcomes through detailed policy and program refinement.

Because this letter focuses on the DEIR, this letter **links** suggestions for "mitigation measures," in the form of policy suggestions, to reduce the potentially significant and significant impacts related to the project (DGP) and cumulative development. As the Town and its consultants are aware, the central purpose of an EIR is to identify the significant effects of the proposed DGP, and evaluate ways of avoiding or minimizing those effects. CEQA also incorporates a substantive requirement that the lead agency adopt feasible mitigation measures or alternatives that can substantially lessen the project's significant environmental effects; in this case, 9 significant unavoidable cumulative impacts.² Thus, the focus of this letter is to respond to the purposes of the EIR by recommending constructive new policies, programs and land uses for adoption that will reduce or eliminate the significant unavoidable impacts of the proposed DGP.

Our letter also informs the Town that without the inclusion of additional, feasible mitigation measures in the form of policies, programs and land use changes, the DEIR fails to comply with the requirements of the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. and the CEQA Guidelines, California Code of Regulations, title 14, Section 15000 et seq. (CEQA Guidelines). Moreover, the addition of feasible mitigation measures in the form of policies, programs and land use changes is necessary for the General Plan Update to be in compliance with California Planning and Zoning Law. Gov't Code Section 6500 et seq. The fact that this update of the General Plan will produce a revised General Plan that will constitute the blueprint for growth and development in Truckee for the next twenty+ years mandates particularly careful analysis and public disclosure of all of the significant impacts that would occur if DGP including recommended mitigation measures, is approved as proposed.

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The DEIR operates under the premise that there are no additional mitigation measures, in the form of policies, programs and land use changes that are capable of reducing or eliminating those 9 significant unavoidable impacts. We

² We believe that a number of project-related impacts should also have been identified as significant and unavoidable given the lack of facts and analysis to support any other conclusions. Such impacts include, but are not limited to significant impacts to biology, aesthetics and visual resources, jobs-housing balance, growth inducement and traffic. The majority of these impacts stem from the development allowed by the DGP on large vacant properties and in the proposed, expanded Sphere of Influence (SOI). Many of the impact sections fails to analyze impacts of development in the SOI at all.

respectfully disagree and recommend a number of specific mitigation measures and alternatives in the form of policies, programs and land use changes that we believe will:

- Reduce or eliminate significant unavoidable impacts or
- Significantly reduce the DGP's contribution to those impacts; and
- Will go a long way to rendering the DEIR's analysis of impacts and identification of mitigation measures adequate.

6-1

While the logical means of remedying the DEIR's many deficiencies would be to revise and recirculate the DEIR, we believe that many of its defects can be addressed by the inclusion of new and creative mitigation measures in the form of land use changes, policies and programs as suggested herein. Focused revisions to the DEIR for a variety of issues may still be required to fully inform the public, decision-makers and affected agencies of the environmental repercussions of the DGP.

Our detailed comments are as follows:

I. Comments on the DGP Project Description and Setting Sections

CEQA's most fundamental requirement is that an EIR contain an accurate, complete project description. Without a complete project description, an agency and the public cannot be assured that all of a project's environmental impacts have been revealed and mitigated. Under CEQA, the DEIR must contain a clear and comprehensive project description. The DEIR's project description is critical to meaningful public review. See City of Redlands v. County of San Bernardino, 96 Cal.App.4th 398, 406 (2002). Among other components, an EIR's project description must contain a "general description of the project's technical, economic and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities." CEQA Guidelines Section 15124 (c). "A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal . . . and weigh other alternatives in the balance. An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (Emphasis added.) County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192-193.

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It is worth emphasizing here that the project description must include the whole project. Specifically, the CEQA Guidelines define "project" as "the whole of an action, which has the potential for resulting in a physical change in the environment, directly or ultimately. . . ." (Emphasis added.) CEQA Guidelines

Section 15378. Here, it is not clear whether the whole project that has the potential to impact the environment is consistently and adequately disclosed. In particular, impact sections appear to be quite inconsistent in their inclusion of the planned development in the Town's proposed SOI.

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The DEIR fails to provide an adequate description of the setting for the project. CEQA requires a description of the physical environment in the vicinity of a proposed project because such a description is necessary to provide the baseline against which to measure a project's environmental impacts. See CEQA Guidelines Section 15125(a). An EIR's description of the project setting must include a large enough geographic area such that the full environmental context of a project is considered. See CEQA Guidelines Section 15125(c).

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Significantly, the description of the project setting must *include both the local and regional setting*. See CEQA Guidelines Section 15125(a). With respect to the regional setting, special emphasis must be given to environmental resources that are rare or unique to the region and would be affected by the project. See CEQA Guidelines Section 15125(c). Contrary to this mandate, the DEIR fails to describe either the project or the regional setting, including planned growth in the regional area, in sufficient detail to support adequate impact analyses.

Our detailed questions with respect to the Project Description and Setting sections are as follows:

Out Dated Baseline Information: Why Does the DEIR rely on outdated baseline information for the Town? Are the baseline assumptions for the region also out of date? Impact sections appear to use baseline information from different years. How does this affect the DEIR's conclusions concerning the significance of project-related and cumulative impacts to traffic and air quality for example?

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According to the DEIR: "Analysis in this EIR uses 10,823 units as the baseline for existing residential development," even though there were an additional 188 units built by 2005 and an unknown number by May 2006. During the same period (2004-2005), population grew by 1,443 persons, a significant increase over existing population. DEIR at 3-4 to 3-5. The Traffic and Circulation section refers to the unit increase over 2003. DEIR at 4.12-37. The Project Description bases non-residential build out on 2004 figures. DEIR at 3-43. Is a different baseline year used for the traffic analysis than other impact analyses? Are different build out figures used in the different impact analyses? How does this affect the conclusions reached concerning various impacts – project-related and cumulative?

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Assumptions about the number of second units.³ What is the basis for the DGP's and DEIR assumption concerning second unit development? A footnote in the DGP states: "Future patterns of seasonal home distribution were assumed to remain relatively similar to today." DGP at 3-41. What trend data was obtained to verify this assumption? Does the trend data extend to the full life of the DGP? Were surveys taken? Was market data obtained? If so, this should be summarized in the response to comments. If not, research needs to be completed to validate this important assumption. Why doesn't the baseline include any second units when there must be existing second units in Town?

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The DGP assumes that only 20 percent of all *future* single family homes (not total?) will include secondary dwelling units. Given the shortage of affordable housing in the Town and region, secondary units would be a good source of additional housing. The DGP is a 20+ year plan. It seems likely more homeowners will take advantage of the secondary unit ordinance. Moreover, MAPF believes that this source of housing should be promoted as a good source of affordable housing and consideration given to further incentives to build secondary units where they will be retained as affordable housing. Therefore, unless secondary units are "capped" to 20 percent of future single family homes, a revised traffic analysis should include the full potential build out of secondary units.

Assumptions concerning occupancy of seasonal and vacation units.

What is the basis for the assumption that these units, and in particular, timeshare units, will not be *fully* occupied on a year round basis? A breakdown by the size of these units would inform this analysis as well, since much of the newer vacation units stock are comprised of very large units capable of housing multiple families and/or large groups. Therefore, the low occupancy assigned to these units may underestimate occupancy by a considerable amount. What are the trends for full time residents occupying units originally constructed for seasonal and vacation units? What are the trends for 'next generation' consumers? What are the trends in response to improvements in communications technology?

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The DEIR assumes that of the total future units built in Truckee, 10,844 will be occupied year round and 9,238 will be seasonal or vacation units. DEIR at 3-42. "To account for the proportion of dwelling units in Truckee that are used as second homes, a factor of 0.54 is applied to the total population density derived from the above calculation method." DEIR at 2-8. Again, unless there is a limit on occupancy for these units, a revised traffic analysis should include higher

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³ It should be emphasized here that MAPF supports policies calling for second units and density bonus units. However, to the extent these units are allowed by the DGP, they must be included in the Project Description and impact analysis.

occupancy assumptions for these units and some transition over time of these units to full time residency, if trend analysis indicates this could be occurring:

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Full build out assumptions used to analyze impacts. The DEIR appears to be inconsistent in its description of what constitutes full build out.

The DGP correctly states that the build out projections should reflect the maximum total amount of residential and non-residential development, including existing and future development that could occur with implementation of the 2025 DGP. DEIR at 3-41. Yet, the assumptions used in the Traffic and Circulation section of the DEIR are different than in the Project Description and quite different in the Traffic Appendix, A (not shown in the table below):

Land Uses	Project Description DEIR at 3-42 to 43	Traffic and Circulation DEIR at 4.12-37 to 38
RESIDENTIAL LAND USES	Units	Units
Single Family Residential	15,293	NA
Multi-Family Residential	3,644	NA
Density Bonus Units	NA	NA
Second Units	1,145	NA
"Primary" Dwelling Units	NA	18,937
TOTAL RES BUILDOUT	20,082*	18,937
SOI	627	NA
NON-RESIDENTIAL LAND USES	s.f.	s.f.
Commercial	1,994,000	1,994,000
Office	952,000	952,000
Light Industrial/Warehouse	1,259,000	NA
Religious Institution	85,700	NA
Lodging	1,392	NA
SOI	NA	NA

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*Neither set of Project Description assumptions count the SOI uses in the total build out. What impact analyses include the SOI? Please refer to pages in the DEIR. If they do not, why not, since the proposed development in the SOI is part of the "whole project."

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Further confusing the question of what the DEIR analyses relied on in calculating impacts, the Land Use Element of the DGP describes the Town's assumptions about density and intensity as follows: "Densities and intensities shown for each designation reflect an average for the entire Town. For example, where a

6-11

Residential land use category has a density of 1 unit per acre, individual projects or zoning on individual parcels may be at a higher or lower density, while all land uses within that category Town-wide will average 1 unit per acre. For non-residential land uses, where the allowed intensity can average 0.20 FAR, an individual project may have a higher or lower FAR, while the average intensity Town-wide would be 0.20." Land Use Element at 2-12. How is this enforced? How ensure that total development does not exceed the average? Again, was build out based on applying the average density to each vacant or underutilized acre, or the highest end of the density/intensity range? Please show your work in a table in the responses to comments.

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Given the complexity and importance of this issue, the responses to comments should indicate the build out figures used for each impact section in table form. If there are inconsistencies, those inconsistencies should be resolved in a revised Project Description and analyses revised accordingly. And, if the SOI development was not included, revised impact analyses must be completed for traffic, air quality, noise and other impacts.

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The Project Description also notes that "it is difficult to say precisely what mixture of non-residential uses might be developed under the 2025 General Plan, since they would be greatly influenced by economic conditions and other factors." DEIR at 3-42. What was the basis for the mix included in Table 3-5 at 3-42?

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Finally, it is not clear what the traffic modeling did do with respect to inclusion of second units. The memorandum from Becky Bucar, LSC, April 18, 2006 (end of Appendix A) refers to a model run assuming all second units would be occupied on a full-time basis. What did that run show in terms of increased traffic impacts from the project?

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Density Bonus development assumptions. How are the allowed density bonus units accounted for in the DEIR? See e.g. DGP at 2-23. How are affordable and workforce housing units above and beyond the minimum requirements and levels accounted for in the DEIR? See e.g. Policy P1.2 – Projects that exceed minimum requirements and mandated levels for provision of affordable and workforce housing shall be given a higher priority for development approval. Such projects may be considered for application of less stringent development standards in order to facilitate their development." DGP at 2-50.

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According to the adopted Housing Element:

"Consistent with State Law, the Town provides for a minimum density bonus of 25 percent for projects which include dedicated affordable housing...If no other development incentives or concessions are granted

to the project, a higher density bonus up to a 35 percent is allowed; a density bonus up to 50 percent is permitted if the project site is located within a quarter mile of a commercial center with a grocery/drug store anchor and within one quarter mile of a transit route." Housing Element, at H-79.

While this is an excellent policy supported by MAPF, the growth implications of the policy must still be considered in the DGP DEIR. It does not appear that any assumptions were included in the impact analyses concerning density bonus units that could be built under the DGP. An assumption must be made about this potential and a revised traffic analysis run (which also includes full build out, realistic assumptions concerning secondary units, development potential in the SOI, all potential non-residential uses, etc.).

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Assumptions about transportation improvements included in the model. Which of the improvements that are assumed to be built in the traffic model are certain to be funded? Which do not have certain funding?

Impact CIR-1 suggests that a number of the improvements identified in Table 4.12-10 and 3-4 in the Project Description are not funded. DEIR at 4.12-54. Improvements that are not funded should not be included in the traffic model. New model runs should be completed that do not include any unfunded improvements. Otherwise, the traffic impacts of the project and cumulative projects may be grossly understated. What regional improvements are included in the model? Please indicate how each of these will be funded.

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Regional growth assumptions. What specific assumptions were used for regional development and associated traffic?

The Traffic and Circulation section states: "The Martis Community Plan was included in the model because the land uses within the Martis Community Plan area significantly impact travel patterns in the Town of Truckee." DEIR at 4.12-37. A breakdown of the growth and development assumed for the Martis Valley must be disclosed since there were many questions raised about the validity of assumptions contained in the Martis Valley Community Plan by the Town and others during the approval process. What other regional growth assumptions were used in the model? These should be broken out in a table by area/community and by land use. What growth was assumed at the Airport?

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Other DGP Elements. The Project Description and/or Setting omits a number of features in the Town and its SOI, including, but not limited to: Summit Creek, Billy Mack Creek and Lakeview Creek; Numerous wetlands including, but not limited to Greenpoint springs, McGlashan

6-19

springs, wetlands at the Alder Drive and Grays Crossing sites; and the deer migration corridor under the Donner Lake interchange.

A revised Project Description and/or Setting sections, including maps, should include these features. Impact analysis should be revised as necessary to indicate potential impacts to these features from proposed town or regional development.

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II. The DEIR Fails to Adequately Analyze and Mitigate Project-Related and Cumulative Significant Impacts

An EIR's basic job is to provide a sufficient degree of analysis to inform the public about the proposed project's adverse environmental impacts and to allow decision-makers to make intelligent judgments. CEQA Guidelines Section 15151. In this case, the DEIR's analysis of environmental impacts fails to provide the necessary facts and analysis to allow the Town, the agencies and the public to make an informed decision concerning the project, mitigation measures and project alternatives. CEQA requires that an EIR be detailed, complete, and reflect a good faith effort at full disclosure. Id. Consistent with this requirement, the information regarding the project's impacts must be "painstakingly ferreted out." Environmental Planning and Information Council of Western El Dorado County v. County of El Dorado, 131 Cal.App.3d 350, 357 (1982).

One of CEQA's fundamental purposes is to provide **meaningful analysis** of impacts so as to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." Emphasis added. Laurel Heights II, 6 Cal.4th at 1123. To accomplish this purpose, **an EIR must contain facts and analysis, not just an agency's bare conclusions.** Emphasis added. Citizens of Goleta Valley v. Board of Supervisors, 52 Cal.3d 553, 568 (1990). An agency may not defer its assessment of important environmental impacts until after a project is approved. Sundstrom, 202 Cal.App.3d at 306-07. An EIR's conclusions must be supported by substantial evidence. Laurel Heights Improvements Ass'n v. Regents of the University of California, 47 Cal.3d 376, 394 (1988) (Laurel Heights I). As described below, the DEIR fails to identify, analyze or support with substantial evidence its conclusion regarding the Project's significant environmental impacts.

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As part of its incomplete approach to the analysis of impacts and identification of feasible mitigation, the DEIR repeatedly concludes that **all** of the Project's environmental impacts are less than significant without additional mitigation, while at the same time deferring necessary analysis. **These "bare conclusions" are insufficient; the EIR "must contain facts and analysis" to support and explain such conclusions.** Emphasis Added. Santiago County Water Dist. v. County of Orange, 118 Cal.App.3d 818, 831 (1981). An EIR may

conclude that impacts are insignificant only if it provides an adequate analysis of the magnitude of the impacts and the degree to which they are mitigated by the project's design or mitigation measures. See Sundstrom, 202 Cal.App.3d at 306-07. If an agency fails to investigate a potential impact, its finding of significance cannot stand. Id. In this case, the "mitigation measures" are proposed policies in the DGP. In responding to comments, a table should be included for each impact that explains exactly how each policy eliminates any potential for impact. If this chain cannot be explained, additional analysis and mitigation is indicated.

Feasible mitigation measures -- in this case, in the form of policies, programs or land use changes -- must be identified and analyzed in the DEIR for both project-related and cumulative impacts. If mitigation measures are deferred until after Project approval or so undefined that it is impossible to evaluate their effectiveness, the DEIR is in violation of CEQA. CEQA requires all mitigation measures be adopted simultaneously with, or prior to, project approval. Mitigation measures may not be deferred when their effectiveness is uncertain or when deferral would prevent the DEIR from disclosing the potentially significant impacts of those measures. Sacramento Old City Ass'n v. City Council of Sacramento, 229 Cal.App.3d 1011, 1027-29. (1991). Uncertainties regarding the mitigation of impacts must be resolved before a lead agency may make the required CEQA findings; an agency may not rely on mitigation measures of uncertain efficacy or feasibility. Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d 692, 727 (1990). An agency may defer preparation of a plan or completion of a study only when the agency commits itself and/or the project proponent to satisfying specific performance standards that will ensure avoidance of any significant effects. Id.

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Finally, a lead agency may not conclude that an impact is significant and unavoidable without requiring the implementation of all feasible mitigation measures to reduce the impact to less than significant levels. CEQA Guidelines Sections 15126.4, 15091. The opportunity exists to consider additional feasible mitigation measures such a community overlay to target increased density, implementation of the transfer of development rights policy and potentially implementation of an open space protection program consistent with the recommendations of the towns open space committee. CEQA cautions that "public agencies should not approve projects as proposed if there are . . . feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects . . ." Pub. Res. Code Section 21002. As with the other flaws enumerated below, the DEIR fails to identify feasible mitigation measures capable of mitigating the significant environmental impacts of the project. CEQA Guidelines Section 15126.4. Contrary to these well established principles, the DEIR violates CEQA by deferring critical analysis of Project/DGP impacts and identification of feasible mitigation measures.

A. Population, Employment and Housing

The DEIR fails to adequately document its conclusion that the implementation of the DGP will not result in any significant impacts to population, employment and housing. In addition, the section omits feasible mitigation measures for project-related and cumulative impacts.

According to the DEIR:

“The 2025 General Plan seeks to provide new employment opportunities for Truckee residents and to allow residents to work, shop and live within the community. A range of housing types are allowed and encouraged by the 2025 General Plan to provide housing to meet the varying income levels and housing needs of the town’s residents. Policies of the 2025 General Plan would support the comprehensive range of policies and programs included in the Housing Element, as it was updated and adopted in 2005.”

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While the DEIR concludes that there will be no significant impacts related to jobs, housing or employment from the implementation of the DGP, it does find that there will be significant unavoidable cumulative impacts:

SU Impacts: “However, with expected regional growth in job-generating uses, and the balance of housing that would be provided region-wide to serve the employees of these jobs, there would be a significant, cumulative impact to housing. No mitigation is available for this impact.” The DEIR finds that the implementation of DGP results in no significant project-related impacts on population, employment and housing. Therefore no mitigation measures are required. DEIR at 4.10-16.

Our concerns with this discussion are threefold:

First, the DEIR fails to provide any analysis of the jobs-housing imbalance that will result from implementation of the DGP in Truckee and its SOI. What is the balance of jobs to housing currently in Truckee? In the region? Please break this down by the type of jobs and affordability of housing stock. Will this jobs housing imbalance be increased by the DGP? If so, please describe in detail where new employees in Truckee and region will reside. The DEIR states that single family homes are out of the reach of all but above moderate income households? How many new jobs will produce above moderate incomes? Please provide a table of housing build out under the DGP by income level (very low, low, moderate, above-moderate) correlated with projected job growth by job type and income. Without this information, the conclusion that the implementation of the DGP will not result in any significant impacts related to jobs, housing and employment is

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not supported by facts or analysis. It is not sufficient to recite policies in the DGP and simply conclude without analysis that impacts will be less than significant. MAPF believes that a revised DEIR must identify impacts to jobs-housing balance and potentially displacement of Truckee residents and workers as significant and unavoidable unless facts are provided to prove otherwise.

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Moreover, the DEIR concludes that the implementation of the DGP will not displace population. There is some empirical evidence that as housing prices in Truckee rise, residents are being displaced to outlying communities. The discussion lacks any data, facts or analysis to support this conclusion.

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Second, although we agree with the conclusion that there will be a significant cumulative impact to housing, again, the discussion lacks facts and analysis to support these conclusions. The importance of facts and analysis is that this information may assist the decision-makers in determining what type's mitigation measures could reduce the impacts. Moreover, bare conclusions, unsupported by facts and analysis, do not meet CEQA's standards. A revised analysis of population, employment and housing impacts must be completed and based on facts and analysis.

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Third, the discussion omits feasible mitigation measures in the form of modified land uses, policies and programs for both project-related and cumulative impacts that could improve jobs and housing balance and reduced trips accordingly. Feasible measures that should be considered include, but are not limited to, the following⁴:

- New Policy – Market Rate Housing Allocation System (mitigation measures): Link above Market Housing Production to Production of New Jobs/Demonstrated Demand for Above-Market Rate Housing in an Allocation System. Allocations for above-market rate housing would be based on a total number of units actually needed to serve residents/new employees in the Town. Affordable and work force units, and possibly higher densities under the Overlay system proposed below, would be exempt from the allocation process and numbers, thereby providing an incentive for production of a greater number of needed and affordable housing units.
- Modified Policy – Community Benefits Funding Overlay Policy and Implementing Program – (mitigation measure): Designate Targeted Areas Along Transportation Corridors and Near the Downtown for Higher

6-25

⁴ Note that MAPF will be submitting more detailed policy proposals in August after the FEIR has been published and the Planning Commission hearings begin on the DGP. In the meantime, we urge the Town and its consultants to identify additional feasible measures in the form of new or improved policies and provisions to reduce project and cumulative impacts.

Densities under an Overlay System. The proposed DGP uses "overlays" for neighborhood enhancement purposes.⁵ This "Community Benefits Overlay system" would utilize an overlay system to accomplish the broader community goal of funding community benefits in return for appropriately targeted increased densities/intensities and values. Specifically, under this overlay system, landowners/developers could voluntarily seek higher densities in return for providing considerations such as open space mitigation fees, higher percentage of affordable housing, transportation improvements and other benefits. Under this system, the underlying density would apply unless the higher density is voluntarily sought and considerations offered in exchange for receiving higher densities/enhanced land value. Tied to the above Market Rate Housing Allocation policy, incentives could be created that would provide a high degree of certainty for Overlay densities to be sought.⁶

- o Modified Land Use Designations/Policy (mitigation measure): The DGP proposes to change a number of and use designations to allow additional or modified development. Rather than provide "by right" increases in intensity and density that are either parcel related (e.g. proposed land use change on Ponderosa Golf Course to SSA-2 allowing for up to 150 clustered units) or land use designation related (e.g. increased density in the Commercial land use designation from 1.5 du/ac to between 4 and 12 du/ac), increased density/intensity should be allowed under an overlay and voluntarily sought in return for other considerations. Increased density and intensity corresponds with increased value to the property owner. In return, property owners/developers should "share" the benefits of this increased value. One creative method for doing so is the "overlay designation" system mentioned above, whereby the underlying land use and density/intensity remains in place unless and until the landowner voluntarily provides additional community benefits in return for exercising the option to seek the higher value land uses provided for under the overlay. The City of Livermore used an "urban overlay designation" very effectively to generate millions of dollars to agricultural land mitigation and high quality urban design.

6-25

⁵ Specifically, the DGP proposes seven new overlay designations, which retain the underlying density and intensity, but provide additional policy guidance. DEIR at 3-25. As suggested above, an additional overlay system could be used to provide incentives for higher density development on parcels currently designated for low density residential uses, but are near downtown. Higher densities would be sought voluntarily in return for other considerations such as open space mitigation fees, additional affordable housing, etc.

⁶ MAPF will be working with key parties, including the Town, to identify specific parcels that may be appropriate for density/intensity increases under the "voluntary" overlay system, as well as the open space areas that should be prioritized for acquisition either through fees generated as part of the overlay system or under a TDR system (to be determined).

- Modified Policy – Maximum Density Requirement (mitigation measure): Consider requiring the maximum density rather than the average density, to be achieved under some/all of the residential land use and mixed use designations.
- Modified Policy— Minimum Housing Requirements (mitigation measure): Consider requiring a 'no net loss of housing' policy in commercial mixed use zones to encourage the construction of additional housing as existing housing is converted to commercial or office uses. Such a policy could be implemented through mitigation fees or phasing of commercial conversion and new housing.
- Modified Program – DGP Rating System (mitigation measure): Tie the DGP Rating System to Actual Production of Affordable and Work Force Housing: The DGP already proposes a rating system for all projects as follows: Rating System. Action A1.1 calls for the development of "a system whereby development projects can be given a rating based on the degree to which they meet the goals for preservation and enhancement of community character, adherence to town design standards, open space preservation, environmental sustainability, provision of affordable housing, minimization of sprawl, and promotion of a livable community. Amend the Development Code to reflect the guidelines developed under this system and to preclude approval of projects that do not meet minimum community standards." DGP at 2-51. Additional specificity about the provision of affordable housing in projects could be provided in this program.
- Modified Policy – Tele-Commuting Policy (mitigation measure): DGP Policy P5.5 calls for: "Support telecommuting and home-based office by encouraging the development of communications infrastructure and facilities such as satellite offices and local telecenters." DGP at 2-57. Rather than passive support of telecommuting, implementation could include use of mitigation fees created by the 'community benefit overlay' to create a free municipal scale high speed wireless network or other new technologies, and marketing the option of working from home one day a week, to reduce regional traffic impacts.
- Modified Housing element policy – Housing Replacement (mitigation measure). The Housing Element includes a policy to require in-kind or better replacement of affordable housing units lost through conversion of mobile home parks. This policy should be expanded to require any project that eliminates or converts existing housing units to replace those units and sell or rent them at the same affordability as the units lost.

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- New Policy – Expanded Affordable Housing In Lieu Fee (mitigation measure). Require affordable housing in-lieu fee for single family homes unless they provide an affordable second unit.
- New Policy – Mixed Use “Mix” (mitigation measure). Provide more precise outcomes for mixed use designations and possibly cap certain uses to be sure the appropriate mix of uses is achieved. More discussion is needed with the Town about how to more specifically define allowable uses under this designation.

6-25

Consideration should be given to these and other feasible mitigation measures which would go a long way to alleviate our concerns about the inadequacies of discussion of impacts to population, jobs and housing.

B. Traffic and Circulation

The traffic and circulation section of the DEIR does identify a number of significant and unavoidable impacts, including lack of funding for planned improvements; intersections operating at below acceptable service levels; and impacts to I-80. The DEIR states that there are no mitigation measures to further reduce the local impacts. The DEIR may be underestimating impacts based on its underestimation of what constitutes full build out under both the DGP and cumulative conditions. In addition, the section omits feasible mitigation measures for project-related and cumulative impacts to traffic and circulation, including transit.

6-26

Our first concern is the most important. If full build out of the DGP and regional growth has not been included in the traffic modeling, or if the model includes traffic improvements, which are infeasible due to a lack of funding or permitting constraints, a revised analysis must be completed. See our comments on Project Description above.

6-27

Second, the DEIR fails to identify and analyze the indirect or secondary impacts of proposed traffic improvements such as closing the Bridge Street Crossing and improvements to I-80. A revised analysis of potentially significant impacts associated with planned improvements/improvements relied on in the traffic model must be included in a revised impact analysis. Those that prove infeasible due to the significance of impacts should be omitted from further consideration. Finally, a stoplight at Donner Pass Road/West River Street/Bridge Street is proposed. In the past this has been proven infeasible. Please provide information to demonstrate the feasibility of this improvement or delete it from further consideration. If this improvement was included in the traffic model, a revised model run must be performed which deletes this and other infeasible improvements.

6-28

Third, a number of feasible mitigation measures are omitted from the discussion that are capable of reducing traffic by increasing density and therefore the walkability/bikability of the town; increasing the chances of transit ridership; improving jobs-housing balance and the like. See above suggestions under our comments on population, housing and jobs.

6-28

In addition, there are other mitigation measures that should be considered:

- New Policy – Distance Based Impact Fees (mitigation measure): This policy and implementation program would create a sliding scale of mitigation fees for projects in Town. Fees would increase as the distance from the downtown and/or transportation corridors increase. For example, the City of Lancaster, California developed an innovative model for assessing impact fees on new development. Called the *Urban Structure Program*, the program charges higher development impact fees for development further from the downtown. Such a fee system could be modified to charge higher impact fees on vacant land development/lower density development and to use those fees for open space and traffic/transit mitigation for example. One goal of the model is to ensure that outlying developments pay the true costs of providing services and to offset true impacts. The system discourages sprawl, promotes more cohesive and orderly development and supports downtown businesses.
- Modified Policy – Big Box Policy (mitigation measure). Policy P6.1 of the DGP states: “The maximum size limit for a single retail commercial use building shall be 40,000 square feet. Exceptions to this size requirement may only be considered through preparation and approval of a specific plan.” DGP at 2-58. Big boxes generate considerably more traffic than other types of commercial development. Moreover, big box stores are inconsistent with other provisions in the DGP that call for protecting/promoting the downtown businesses. This policy should be modified to delete the “exception” to read in full as follows: “The maximum size limit for a single retail commercial use building shall be 40,000 square feet. This maximum includes adjacent structures under the same ownership.”
- Modified Policy – Form Based Zoning (mitigation measure). Policy P6.4 of the DGP states: “Require buildings to be located closer to the street, where appropriate, and for off-street parking areas to be located to the rear of commercial buildings, where feasible.” DGP at 2-58. Form based zoning and planning that requires buildings to be oriented to the street and parking areas to be located to the rear of the building and limited in scale increase walkability. This policy should be modified to delete “where

6-29

feasible” to read in full: “Require buildings to be located closer to the street, where appropriate, and for off-street parking areas to be located to the rear of commercial buildings.” If a project cannot be physically developed in this manner, a variance should be required. We fully support Action A5.1, but believe that the principles of form based zoning can be captured in the Community Character Element of the DGP. This would give these provisions higher status.

- Modified Policy – Economic Analysis (mitigation measure). Policy A6.1 of the DGP states: “Conduct an independent economic analysis prior to approval of the Specific Plans for PC-1 and PC-3...Use this analysis to understand the economics impacts of proposed development on the Downtown and the community as a whole, and to identify possible competition with significant new development planned downtown. DGP at 2-59. This policy goes a long way to ensure that ongoing success of Truckee’s downtown. The policy should be strengthened to state that projects that would compete with downtown should be disapproved.
- Modified Policy – Neighborhood Walkability (mitigation measure): Consistent with the above considerations for maintaining the downtown’s health, Policy P10.3, “Seek opportunities to add or incorporate non-commercial community-serving facilities within existing neighborhood centers” should be given more prominence in the DGP. Again, overlays that allow landowners to voluntarily seek higher value, mixed use development in appropriate centers to improve walkability should be considered. For example, the small community serving commercial area at Glenshire might be appropriate for a community-service district overlay that would allow additional community services with housing over.
- New Policy – Industrial Use Protections (mitigation measure): Maintaining a healthy balance of land uses in Truckee is essential to achieving jobs-housing balance which will in turn reduce traffic trips. In addition, a mix of industrial uses is essential to the Town’s economic vitality over time. Stronger protections should be included in the DGP to ensure that land designated for industrial uses is not converted to other uses or permitted to develop for non-industrial uses.
- New Policy – Ski Shuttles (mitigation measure): A new policy and funding for remote parking with shuttles to ski areas should be considered. Parking fees could be used to offset the ski shuttle program as well as other transportation-related community benefits as funding permits.
- New Policy and Implementation Program – Transportation Sales Tax Reauthorization (mitigation measure): The Town’s current transportation

6-29

sales tax sunsets in 2008. A new policy and implementation program should be considered that addresses the Town's interest in a reauthorization of the sales tax. The policy and accompanying program should include the Town's commitment to work with the public on the list of transportation and transit projects to be funded as well as a portion of the sales tax that would be directed to "programmatic mitigation/environmental mitigation" that would provide for streamlined permitting for transportation projects in return for pooling mitigation funding and using it to acquire habitat lands to offset transportation project-related, cumulative and growth inducing impacts. San Diego County (TransNet), Orange County (Measure M) and Riverside County have all adopted transportation sales tax reauthorization plans that include or propose⁷ significant funding for habitat acquisition to mitigate the project impacts.

6-29

Consideration should be given to these and other feasible mitigation measures, which would go a long way to alleviate our concerns about the inadequacies of discussion of impacts to traffic and circulation. Such policies would also reduce air quality and noise impacts to the extent they are successful in reducing traffic impacts.

C. Aesthetics and Visual Resources

According to the DEIR: The 2025 General Plan also envisions substantial amount of new development would occur within areas that are currently vacant or undeveloped. DEIR at 4.1-19. Such development will inevitably alter the visual character of these areas. This section, like other sections of the DEIR, recite numerous proposed policies and conclude that these will eliminate potentially significant impacts, but lack any analysis or facts to support the conclusions. For example, the section lacks any visual simulations or overlay analyses demonstrating how policies would prohibit development in visually sensitive areas. Another way to put this concern is, what areas within the SOI would not be developed as a result of DGP policies and how do these areas coincide with visually significant or biologically significant areas? A revised discussion should use more graphics and illustrations to show how the policies actually address potential impacts.

6-30

The DEIR fails to analyze the impacts of development in the SOI on aesthetic and visual resources. Again, use of graphics and maps overlaying development on scenic and biologically constrained areas would go a long way to support the conclusion reached that implementation of the DGP would result in less than significant impacts to aesthetics and visual quality.

⁷ Riverside and San Diego County Plans are adopted. Orange County Measure M is being proposed for the November 06 ballot.

The discussion does conclude that cumulative impacts would be significant and unavoidable, but provides no mitigation for these impacts. Mitigation measures that should be considered and are capable of further reducing project-related and cumulative impacts include the following:

- Modified Policy – SOI Policy (mitigation measure): This policy would be directed at maintaining the Town's SOI at the existing Town Limits. This policy direction would be coupled with new policies and programs to protect these lands in permanent open space through a willing seller process. Among the major goals of the DGP is to: "increase the amount of permanently protected public open space in the Town, and to provide for the long-term preservation and management of these resources." DEIR at 3-14. Yet, at the same time, the DGP proposes to significantly increase the size of the Town's SOI and to annex the area for urban development. Specifically, the DGP proposes to include approximately 700 acres to the west and 1,700 acres to the east in the Town's SOI. According to the DEIR: "Truckee plans to submit its proposed sphere of influence to the Nevada County LAFCO as its official SOI." DEIR at 4.8-3. According to the DGP: "Truckee's proposed Sphere of Influence reflects the area outside the Town limits, within unincorporated Nevada County, which the Town expects to annex in future years." DEIR at 3-6. The 2025 DGP does not make any changes to the land use designations within the proposed SOI, including three PRD areas encompassing a total of approximately 2,170 acres, with the remainder approximately 4,400 acres retained in Resource Conservation/Open Space, Residential Cluster (10 acres) and Residential uses. DEIR at 3-28. According to the DEIR, approximately 627 units of housing⁸ could be built in the SOI, mostly within the PRD areas. An SOI does not provide the Town any increased "influence" over the area until it is annexed. To the contrary, an SOI indicates the Town's interest in annexing the area for urban development. Therefore, the Town's "influence" over the SOI is no greater than over its planning area. It is very important to note that an SOI means "a plan for the probable physical boundaries and service area of a local government agency." The DGP acknowledges that "[a]nnexation of resource lands or sparsely developed areas is generally not appropriate unless done in conjunction with the annexation of development areas." DGP at 2-65. Among the intended uses of the DGP EIR are land annexations and updates to the SOI. DEIR at 3-44. The DGP makes clear that there is sufficient land for development to 2025 in the existing City Limits. Therefore, additional development in the SOI is **not** needed to accommodate growth and would likely not produce affordable housing,

6-31

⁸ 522 single family residential units and approximately 105 second units. Second units are based on the assumption that only 20% of all future single family units will include second units. DEIR at 3-42.

since the areas designated for development are designated at very low densities. A number of related policies and programs should be included in the DGP to focus growth in the existing City Limits and protect regional open space, including the following policy/program concepts:

1. Maintain the SOI at the existing Town Limits.
 2. Engage in an immediate dialogue with Nevada County to limit the County's ability to urban develop in the Town's Planning Area and to participate in developing a detailed strategy for protection the area in open space *from willing sellers*.⁹ The quid pro quo for maintaining the SOI at the Town's limits is Nevada County cooperation related to land use and open space protection. There are numerous examples of binding City-County Memorandum's of Understanding, Joint Power's Agreement's and other agreements to accomplish this outcome. We will be providing those along with our more detailed policy comments.¹⁰
 3. Refine the Community Benefits Overlay system (above) to generate funding for community and regional open space.
 4. Determine and pursue other funding opportunities for community and regional open space. See Attachment A, hereto, Survey of Voters and Property Owners Regarding Open Space, Parks and Recreation, Conducted for the Town of Truckee, December 2004. This survey indicates that those who participated in the benefits assessment survey, voters and property owners favored measures to raise funds for the acquisition and protection of open space, as well as maintenance and improvement of parks and recreation areas.
- o Modified Policies – Open Space Acquisition Strategy (mitigation measure): A related policy change would be to identify additional mechanisms to permanently protect open space within the broader Planning Area. Policy direction for this area is inconsistent and simultaneously calls for supporting the provision of affordable housing in the same areas identified for open space protection. For example, Policy P9.4 states: "Support the provision of housing within the Planning Area outside the Town limits to

6-31

⁹ This refined open space protection strategy could be in the form of a TDR or PDR program, as well as other approaches.

¹⁰ Kings and Calaveras County share one housing element among the County and its cities. These elements direct housing to the cities. Solano and Napa County by agreement, direct housing development into the cities and away from resource lands. The City of Davis and Yolo County have a binding agreement that the County will not develop in the City's planning area. Vacaville and Dixon created a JPA to purchase land, place conservation easements on the land and resell it for limited agricultural uses. There are numerous examples of City-County TDR programs, where rights are transferred from the County unincorporated area into the City. The Town Staff and its consultants should also be undertaking research on cutting edge policies that could actually result in protecting the planning area in open space.

meet all demand created by new employment-generating development in these areas.” DGP at 2-66. Action: “Work together with Nevada County and Placer County to develop a coordinated open space protection strategy for the Planning Areas.” DGP at 2-66. In light of strong support for open space protection among Town property owners and voters, stronger policy direction for protection of the area surrounding the Town Limits as permanent open space/working landscapes while simultaneously providing for increased opportunities for affordable housing within the overlay area should be developed and included in the DGP.

6-31

- o Modified Policy – Ground Floor Vitality (mitigation measure): The aesthetics of the downtown rely in large part on the vitality of the ground floor uses. The DGP contains Policy P6.8 which calls for Discouraging ground-floor office uses in buildings in the Downtown core. This policy should be modified to cap the amount of ground floor office space to existing levels or below (allowing a reduction over time as space turns over) and prohibit new such uses on the ground floor.

Consideration should be given to these and other feasible mitigation measures which would go a long way to alleviate our concerns about the inadequacies of discussion of impacts to aesthetic and visual resources.

D. Biological Resources

The DEIR concludes that the project – implementation of the DGP – will result in less than significant impacts to biological resources. However, the cumulative impacts would be significant and unavoidable. Like the other impact sections, biology is devoid of facts (e.g. how many acres of each sensitive habitat would be impacted by the DGP including development in the SOI) or analysis to support its conclusions. This flaw is enhanced by the lack of adequate and complete information about the biological setting (e.g. creeks and deer corridors are omitted from the PD and Setting; see our comments above).

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A revised analysis must illustrate where and what types of development will occur under the DGP and overlay that on maps indicating areas of sensitive habitat and special status species. A fact based analysis must be conducted to determine the likely “actual” impacts of the implementation of the DGP. Such an analysis should revisit the likely significance of impacts of development on biological resources, including, but not limited to fragmentation and direct loss of habitat. We are attaching for your information an analysis of the General Plan-2020 for San Diego County that analyzes the proposed land use changes on biological resources and concludes that even though habitats are not directly impacted by development, habitat values can be lost from indirect impacts of

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adjacent development (clustered development) and low density development. See Attachment B hereto.

6-35

The DGP DEIR fails to consider the potentially significant indirect impacts on habitat from low density and clustered development, and instead credits these land use patterns and policies with reducing impacts. Analysis not rhetoric is needed to fully inform the public and decision-makers of the impacts of the DGP, particularly in the SOI.

Because the DEIR concludes there will be no significant impacts on biological resources from the DGP, no mitigation measures are provided. A revised analysis of impacts must be completed and feasible mitigation measures in the form of modified land uses, policies and programs for both project-related and cumulative impacts that could reduce impacts to project-related and cumulative impacts included. Feasible measures that should be considered include, but are not limited to, the following¹¹:

- Measures/New Policies cited above related to the SOI and Planning Area. Limiting the SOI to the existing city limits and identifying land uses, policies and programs directed at protecting lands outside the city limits in open space/working landscape uses, should be a priority of the revised DGP. Such policies would go a long way to eliminating our concerns over the lack of analysis and facts in the DEIR's evaluation of impacts to biological resources.
- New Policy – Old Growth Tree Protection (mitigation measure): A new policy should be added to protect old growth trees.
- New Policy -- Wetland Protection (mitigation measure): Stronger policies should be included to protect wetlands and their inflow and outflow. The Town Staff and Consultant team should research other jurisdiction's policies in this regard and consult with the Department of Fish and Game and the U.S. Fish and Wildlife Service. A minimum setback should be 100 feet with larger setbacks required where habitat is or could be suitable for supporting special status species.

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Consideration should be given to these and other feasible mitigation measures, which would go a long way to alleviate our concerns about the inadequacies of discussion of impacts to biological resources.

¹¹ Note that MAPF will be submitting more detailed policy proposals in August after the FEIR has been published and the Planning Commission hearings begin on the DGP. In the meantime, we urge the Town and its consultants to identify additional feasible measures in the form of new or improved policies and provisions to reduce project and cumulative impacts.

E. Growth Inducement

The DEIR must consider the growth-inducing potential for the Project. CEQA requires that an EIR include a "detailed statement" setting forth the growth-inducing impacts of the proposed project. See Pub. Res. Code Section 21100(b)(5); City of Antioch v. City of Council of Pittsburg, 187 Cal.App.3d 1325, 1337 (1986). The statement must "[d]iscuss the ways in which the proposed project could foster economic growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." CEQA Guidelines Section 15126.2(d). It must also discuss how a project may "encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively" or "remove obstacles to population growth." Id.

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Rather than set forth a "detailed statement" of growth-inducing impacts as required under CEQA, the DEIR contains a cursory commentary on growth in the Town and region and concludes that the policies in the DGP actually would reduce the potential for direct impacts associated with directly inducing growth to a less-than-significant level and would not pressure adjacent communities to provide new housing or commercial opportunities. DEIR at 6-3. Once again, there are no facts or analysis to support these conclusions. To the contrary, the implementation of the DGP would likely:

6-38

- Result in a continuing gap of housing affordable to local jobs thereby putting pressure on adjacent communities as far away as Reno to provide affordable housing to meet the gap;
- Extend infrastructure to new development in the SOI, thereby potentially removing barriers to growth further out in the planning area;
- Among other growth inducing aspects of the DGP.

6-39

The discussion also fails to suggest mitigation measures to address growth inducing impacts. A number of the New Policies/measures suggested above, such as the SOI and Planning Area policies, would go a long way to ensure growth inducement associated with the DGP is insignificant. Finally, it does not appear that the figures used for growth resulting from the adoption of the DGP include development in the SOI. See DEIR at 6-12. A revised analysis of growth inducement must be completed and include a description of privately held land within the Planning Area where growth could occur if the SOI area is annexed and developed and services extended.

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III. The DEIR Fails to Analyze an Adequate Range of Alternatives

The DEIR does analyze several alternatives to the proposed project, and does identify what it designates as an environmentally superior alternative. However, the DEIR does not meet CEQA's mandate that it consider and analyze a

6-43

reasonable range of feasible alternatives, with that range focused on alternatives that might reduce the project's identified significant impacts. Of course, as noted earlier, the project's significant impacts have been understated in the DEIR. For that reason alone, the consideration of alternatives needs to be revisited in the revised DEIR. However, even beyond that the analysis of alternatives is fundamentally flawed in several respects, requiring that it be totally rewritten.

6-43

Although the alternatives section of the DEIR describes a number of alternatives, this section continues to fall short of the standard set by CEQA. Under CEQA, an EIR must analyze a reasonable range of alternatives to the project, or to the location of the project, that would feasibly attain most of the basic objectives while avoiding or substantially lessening the project's significant impacts. The DEIR fails to meet the CEQA standards for a number of other reasons as follows:

6-44

First, not one of the alternatives presented was developed based on a constraints map showing areas to be avoided in light of hazardous site conditions and Town policies and ordinances (e.g. no development on slopes over 20 percent/30 percent; protection of ridgelines, scenic and natural resources, etc.). Such a constraints map would make manifest policies and other provisions outlined in the Town's General Plan and ordinances. Because no alternative was developed with these policies, regulations and site constraints in mind, none of the alternatives analyzed capture an alternative that bases total units and development footprint on avoidance of impacts and inconsistencies. Such an analysis is of particular importance to those properties that are currently outlying and undeveloped or within the Town's SOI. A revised DEIR must be prepared which includes a constraints-based alternative. The DEIR should include a map illustrating the constraints and a site plan illustrating this alternative. The revised discussion should also include analysis of how the impacts of this alternative differ from both the project as proposed and other alternatives.

6-45

Second, the Mixed-Use and Outlying Open Space Alternative have a lot of merit, but in name only. Due to the proposal in this alternative to increase development on Airport Flats, this alternative ranks below others. It appears that a good concept has been rendered a "straw man." The description of the alternative fails to capture what could be a meaningful alternative that increased development near the downtown and along transportation corridors through voluntary overlay policies, maintained the SOI at the Town limits and provided for additional policies to permanently protect lands outside the Town limits in open space/working landscape uses. Such an option should include an urban growth boundary at the Town limits as well as other policies to increase and enhance infill development, balance jobs and housing affordable to jobs in Town, and protect resources. This alternative could include other good elements of the other alternatives.

6-46

Without revision, the alternatives section of the DEIR remains inadequate under CEQA.

6-46

CONCLUSION

For all of the above-reasons, we believe the Town must revise the DEIR to incorporate analysis and facts to support its conclusions concerning the disposition of impacts and in so doing, identify additional feasible mitigation measures in the form of modified or new land uses, policies and programs.

6-47

Again, we appreciate this opportunity to comment on the DEIR and look forward to submitting additional detailed policy suggestions in August for the Planning Commission hearing on the DGP.

Very truly yours,



John Eaton, President
Mountain Area Preservation Foundation

Cc.

California Department of Fish and Game
U.S. Fish and Wildlife Service
U.S. Army Corps of Engineers
Regional Water Quality Control Board
Sierra Business Council

ATTACHMENTS

- o Attachment A: Survey of Voters and Property Owners Regarding Open Space, Parks and Recreation, Conducted for the Town of Truckee, December 2004.
- o Attachment B: Analysis of General Plan-2020 San Diego County, December 2005.

LETTER 6: John Eaton, President. Mountain Area Preservation Foundation. Received July 6, 2006. The attachments to this document can be found in the 2025 General Plan Final EIR Public Comment Appendix.

- 6-1: This comment is an introduction to the comments that follow. It notes the Mountain Area Preservation Foundation’s (MAPF) mission, and introduces the purpose and position of the organization regarding desired revisions to the proposed 2025 General Plan, and the detailed comments subsequently presented on the Draft EIR. It also provides a discussion of the requirements of CEQA, by way of background and support of the subsequent comments. Since no substantive comments are contained in this portion of the comment letter, no response is required.
- 6-2: This comment provides, by way of introduction, a commentary on CEQA requirements regarding the EIR’s project description, noting the importance of a complete and accurate project description in understanding the potential environmental impacts that it may cause. The comment suggests that the Draft EIR’s project description failed to adequately disclose the full extent of the project, due to accounting of potential growth in the Town’s proposed Sphere of Influence. Since additional detailed comments on the specific ways in which the Draft EIR describes and analyzes the potential impacts of development in the Sphere is provided in subsequent comments, the reader is referred to response to comments 6-10, below.
- 6-3: This comment suggests that the Draft EIR provides an inadequate description of the setting of the proposed project, in that a sufficiently large geographic area, rare and unique regional resources, and future regional growth were each not described sufficiently to inform the discussion in the various impact analysis sections. The “Location and Setting” description in the Draft EIR Project Description is only intended to serve as a general overview of the location and setting of the Town, and its proposed Sphere of Influence and Planning Area.

A topic-specific existing setting section is provided in each of the analysis chapters of the Draft EIR, which provide an appropriately focused and detailed description of the extent and characteristics of the physical environment that could be affected by the project, including rare and unique features where they exist and are relevant to the environmental topic under discussion. No changes are therefore needed to the Draft EIR.

Also see response to comment 6-5, concerning baseline assumptions regarding population and housing.

- 6-4: This comment serves as an introduction to subsequent, more detailed comments regarding the baseline population and housing assumptions presented in the Draft EIR, for both the town and the wider region. The more directed comments are responded to in detail in responses 6-5 through 6-19, below
- 6-5: This comment suggests that inconsistent baseline population and housing numbers were used in different sections of the Draft EIR, and that these differences might affect the findings and conclusions of both the project- and cumulative impact analyses.

The comment correctly notes that the Draft EIR uses 10,823 housing unit totals as the baseline for its analysis. These numbers were based on the assumed development quantities used in the proposed 2025 General Plan traffic analysis, which was initiated in Summer 2003, and finalized in 2006. The Draft EIR has been amended to reflect that 2003, rather than 2004, is the year for which baseline development quantities were calculated. As allowed by CEQA (Section 15125(a)) the environmental setting is to describe conditions as they exist at the time the Notice Of Preparation (NOP) for the EIR is published or at the time environmental analysis commenced. The NOP for the proposed 2025 General Plan was published in March 2004. It should be noted that the comment misquotes the Draft

EIR's statement regarding the increment of population increase: as is stated on Page 3-4 of the Draft EIR, the increase of 1,443 persons is for the 2000 to 2005 period, not 2004 to 2005.

Buildout numbers referenced and analyzed in the individual impact sections in the Draft EIR also reflect the total buildout calculated in the proposed 2025 General Plan traffic study. Appendix A of the Draft EIR, the *Traffic Analyses Technical Appendices*, provides a detailed breakdown of the methodology used in to calculate buildout of the proposed 2025 General Plan's land uses. As noted in the Appendix (Section R.1), these calculations take account of existing development, as well as a series of known approved, but not yet built, proposed projects, and buildout of parcels identified as vacant in the 2003 parcel-based land use inventory.

The Draft EIR uses both consistent baseline assumptions concerning the amount of development, and similarly consistent assumptions regarding buildout of the proposed 2025 General Plan. These assumptions have been made more explicit in the Chapter 4 Environmental Evaluation of the Draft EIR and is included in Chapter 3 of this Final EIR .

- 6-6: This comment refers to the Draft EIR analysis of second units, suggesting that the assumptions used to estimate the potential number of second units in Truckee were flawed or inaccurate. It should be noted that this comment encompasses a reference to the Draft EIR's discussion of **seasonal** units; those that are owned as second homes or vacation rentals, and thus only occupied for a portion of the year. **Second units** are those that are located on a property zoned for single-family residential use, on the same lot as the primary dwelling, and assumed to be occupied year round. Given that the remainder of the comment clearly pertains to second units, this reference is assumed to have been made in error. Comments regarding seasonal

units, including assumptions regarding seasonal unit trends, are addressed in response 6-7, below.

As correctly noted by the commentor, the Draft EIR assumes that 20 percent of future single family residential development would include a second unit. This assumption does extend to the entire life, or buildout of the proposed 2025 General Plan. This assumption was based on input from the Town of Truckee Community Development Department, which has been in the best position to observe trends regarding applications to build second units. In the judgment of the Town, the 20 percent assumption reflects a generous or optimistic position regarding future construction of second units. This is supported by a study assessing the success of the City of Portland, Oregon's Second Dwelling Unit program. This study found that, where 1,000 new residential units were constructed over a two year period, only 83 second dwelling units (or less than one percent of the total) were built.² Even with incorporation of additional incentives or other promotional techniques to encourage construction of second units (which are, as yet, not proposed by the Town), or if existing units (rather than just new units) were to develop second units, total numbers are unlikely to exceed the twenty percent assumed in the Draft EIR, whose findings and analysis do not, therefore, need to be reassessed.

The comment also questions the baseline assumptions regarding second units. It was not possible to develop a precise count of existing second dwelling units in the town based on available data. However, the traffic analysis (and associated air quality and noise analyses based on that traffic analysis) accounted for second units in its modeling of baseline conditions. As noted on page 4.12-37 of the Draft EIR, in Footnote 18, second dwelling units were accounted for in the traffic

² Accessory Dwelling Unit Monitoring Project, Report to Planning Commission, City of Portland Planning Bureau, July 2003. Accessed on-line at <http://www.portlandonline.com/shared/cfm/image.cfm?id=59091>, on July 22, 2006.

modeling of existing land uses by applying a factored increase to the trip generation rate (based on actual traffic counts within several of Truckee's residential neighborhoods) to single family residential development.³ Further, development and calibration of the traffic model was based on an extensive series of counts of actual, existing traffic volumes. As such, the model reflects vehicle traffic associated with existing land uses at the time the counts were conducted, as well as other traffic associated with non-locally generated and pass-through trips. Although no changes to the analysis or findings are warranted, the Draft EIR will be amended where appropriate to note that there are a number of existing second units in Truckee, in addition to existing single family residential units.

6-7: This comment questions assumptions regarding occupancy of seasonally occupied and vacation housing units. Truckee has a very high proportion of housing units that are occupied on a seasonal or occasional basis. Although it is true that some units may be occupied on a more or less year-round basis, it is equally likely that many second homes are occupied for only a tiny fraction of the year, because an owner chooses not to rent it out in addition to their personal use, or is unable to rent it with the frequency they desire, due to demand. This is supported by findings of the *Truckee Economic Strategy*, prepared for the Town in 2001, which notes that only one quarter of second home owners in Truckee attempt to rent their properties when not in personal use, and on average, those owners only successfully rent their properties for 32 days per year.⁴ Occupancy patterns and trends are likely to vary across time, due to factors as diverse as regional and statewide economic conditions, weather patterns dictating an unusually good or bad ski season, or on the basis of unit size.

³ Draft EIR Appendix A, Memorandum to Town of Truckee regarding construction of Second Units, Becky Buchar, LSC Transportation Consultants, April 18, 2006.

⁴ Truckee Economic Strategy, Applied Development Economics, for the Town of Truckee. June, 2001. Page 24

Thus it would be speculative to attempt to project these trends over a 20 year period, particularly in a programmatic level analysis like that in the Draft EIR. No revisions are needed to the analysis or findings of the Draft EIR.

- 6-8: This comment suggests that the assumptions regarding the proportion of future homes built in Truckee that would be second homes may be flawed, and implies that, since no numeric limit or cap on occupation of vacation homes is proposed, a higher proportion of year-round units than that assumed in the Draft EIR's analysis may be built. As noted in the previous response, assumptions regarding proportions of second homes were made based on existing development patterns, and Town staff input regarding trends in the types of developments being proposed in the town. Trends over recent years do indicate that patterns of second home ownership will remain largely as they are seen today, with no observable significant trend towards higher year-round occupancy of residential units. No revisions are needed to the analysis or findings of the Draft EIR.
- 6-9: This comment suggests that build out assumptions for the proposed 2025 General Plan are not consistent between different sections of the Draft EIR, and with figures presented in the traffic analysis in Draft EIR Appendix A.

The commentor is correct to note the differences between buildout figures for residential development presented in Chapter 3, the Project Description, and in Chapter 4-12, Traffic and Circulation. However, the two detailed footnotes on page 4.12-37 explain the ways in which the two numbers differ. As described in the footnotes, the traffic analysis utilized a buildout total that did not reflect the addition of second units. The projected number of second units was 1,145, which, when added to the 18,937 residential units stated in Chapter 4.12, results in a total of 20,082 units, matching the figure listed in the project description. LSC Transportation Consultants

performed additional analysis to determine if inclusion of 1,145 additional second units would result in any changes to the conclusions or findings of the traffic analysis. No such findings were made, and so it was determined to be appropriate to retain, unchanged, the tabulated data in the traffic chapter, and in the accompanying technical appendix, which both reflect the original buildout data.⁵

Regarding differences between the traffic appendix buildout figures for housing and those in the Draft EIR, as is also noted in a footnote on Page 4.12-37, the buildout totals were revised slightly downwards to reflect some revisions to proposed land use designations made after the traffic analysis was complete. Again, these minor changes were found to make no difference to the findings or conclusions of the Draft EIR. An additional perceived difference between the land use forecasts identified in the traffic section versus the traffic appendix is that the “bottom line” totals listed in Table E, in Sub-Appendix I, for buildout includes the entire traffic study area, encompassing land use forecasts for all of Martis Valley, as well some additional areas within the SOI and outside the Town of Truckee. The buildout figures quoted in chapter 4.12 only reflect development in the Town of Truckee, although the traffic analysis did indeed consider development in the Sphere. (See response 6-10, below)

Regarding non-residential buildout, Chapter 4.12 only lists key land uses, and thus provides a less complete listing of estimated non residential buildout in its summary, compared to the project description. The buildout of all land uses (as listed in the project description) were considered in the traffic analysis. Chapter 4.13 of the Draft EIR will be amended to cross reference the more complete list of land uses in the Project Description, in order to eliminate any potential confusion.

⁵ Draft EIR Appendix A, Memorandum to Town of Truckee regarding construction of Second Units, Becky Buchar, LSC Transportation Consultants, April 18, 2006.

- 6-10: Contrary to the commentor's assertion, both the traffic analysis, and the project description include development in the proposed Sphere. Page 3-41 notes that there would be an estimated 627 units in the proposed Sphere, in addition to those within the Town limits. As noted in response to comment 6-9, the traffic analysis also includes development in the Sphere, and this is reflected in the summary of buildout by Traffic Analysis Zone (TAZ) in Table E of SubAppendix I of the Traffic Analyses Technical Appendices. Other quantitative analyses, including those for noise and air quality were derived from the traffic analysis, and so, also reflect development in the Sphere, as do other sections of the Draft EIR. Where needed, individual analysis chapters in the Draft EIR will be amended to make more explicit the fact that development in the proposed Sphere was considered as part of the project analysis. However, growth within the Sphere resulting from the proposed 2025 General Plan was analyzed in all impact sections in the Draft EIR, and no changes are needed to the analysis.
- 6-11: The comment seeks clarification on the assumptions regarding development densities and intensities across individual land use designations, with the implication that the buildout projections may not account for sufficient development quantities.

The provisions included in the proposed 2025 General Plan Land Use Element that allow for individual projects to exceed maximum density standards, as long as the maximum development density is maintained across the entire area in that land use designation, are intended to allow for flexibility and reasonable allowance for site constraints and other considerations, such as incorporation of density bonuses for affordable and workforce housing. The Town's development review and approval processes allow for consideration and monitoring of total development amounts and intensities across land use designations. Development proposals that would exceed stated

maximum densities or intensities are subject to additional review, including, where needed, project level review under CEQA that would provide for detailed analysis of a project's compliance with applicable land use standards and density and intensity limits. Further, Action A2.1 and A2.2 under Goal LU-2 of the proposed 2025 General Plan specifically call for ongoing monitoring and reporting of land use in Truckee and the Sphere, through use of GIS-based mapping. Although no changes to the findings or analysis of the Draft EIR are needed, Land Use Element Action A2.1 in the proposed 2025 General Plan will be amended to reflect reporting of current average land use densities and intensity as an effective means to track adherence to this requirement.

It should be further noted that it is extremely unlikely that all land in a single land use designation in the Town or the Sphere would develop, on average, above its maximum allowed intensity. Historically, most areas of the town have developed below their maximum allowed densities and intensities; either because of site constraints that have effectively limited this maximum buildout from occurring, or due to the types of development that the market has demanded or supported. Indeed, the 2005 Housing Element recognizes and specifically aims to address this concern by requiring minimum density standards to be adhered to.⁶

Given these factors, and the procedures in place for future project-specific review, the Draft EIR assumptions regarding buildout densities are reasonable and appropriate and so no changes are needed.

6-12: The comment requests clarification on how buildout calculations were developed. A detailed summary of the methodology used is provided in Appendix A of the Draft EIR.⁷ As explained there,

⁶ Town of Truckee 2005 Housing Element, Policy H-1.2.2.

⁷ Truckee General Plan Traffic Analyses Technical Appendix, Pages 49-51.

buildout assumptions were conservatively based on calculation of maximum allowed development on vacant parcels, on proposed development in known future projects, and on maximum development quantities in Special Study and Planned Community Areas. A detailed summary of buildout quantities assumed within each TAZ is provided in Draft EIR Appendix A.

- 6-13: Please see responses to comments 6-9 and 6-12, above. Since consistent assumptions are used throughout the Draft EIR's analysis, the table requested in the comment is not necessary, nor are revised impact analyses needed for any of the Draft EIR sections.
- 6-14: Buildout quantities for non-residential land uses were based on those developed for the Draft EIR traffic analysis. A detailed explanation of the assumptions used can be found on pages 49 to 51 in Draft EIR Appendix A: *Truckee General Plan Traffic Analyses Technical Appendices*. These land use quantities are considered to reflect a reasonable set of assumptions regarding future land uses, based on best available information, and so no changes are needed to the analysis in the Draft EIR.
- 6-15: Please see response to comment 6-6 and 6-12, above.
- 6-16: The proposed 2025 General Plan does allow for density bonuses to be applied to individual development projects, in order to encourage the provision of affordable housing. Land Use Element Policy P1.2, which is that referenced by the commentor, is intended to support provisions of the town's density bonus program (which has been in place since November 2000, and is reflected in the Town's Development Code and in the adopted 2005 Housing Element, as noted in the comment). Policy P1.2 is also intended to encompass other concessions that the Town may choose to make to encourage development of affordable housing, such as relaxed parking standards.

Policy P1.2 does not supersede or have greater standing than the Land Use Element's other standards, notably those concerning maximum land use densities and intensities across the entire area in a particular land use designation, as outlined on page 2-12 of the proposed 2025 General Plan. These standards would still apply, and would control the ultimate community-wide densities to those assumed in the Draft EIR. Please see response to comment 6-11 for additional detail concerning application of maximum average density standards. As concluded in that response, no revisions to the analysis or findings of the Draft EIR are needed.

- 6-17: The comment asks which transportation improvements are assumed in the traffic model. The only transportation improvement that is not yet built, that is assumed in the transportation model, is the Pioneer Trail/Bridge Street Extension. This roadway will be funded by Traffic Impact Fees, which have been collected since 1996, and for which engineering and design studies, as well as needed environmental review have been undertaken. No other improvements are assumed under the base case.

Modeling of future traffic impacts included analysis of both unmitigated (without improvements) and mitigated (with improvements) impacts. These results are presented in Table 4.12-10 in the Draft EIR. The Draft EIR found a significant impact with regard the potential need for improvements for which a funding program is not yet in place, and for regional improvements that the Town would have no ability to plan for or implement by itself.

- 6-18: The commenter requests clarification of the assumptions used for regional development and associated traffic, and specifically the land use assumptions for the Martis Valley Community Plan area. The commenter also asks what the other growth assumptions are for areas outside the model and for the airport.

Sub-Appendix I of Draft EIR Appendix A, contains the land use assumption used in the traffic model by Traffic Analysis Zone. TAZs number 100 through 138, represent Martis Valley. These assumptions are consistent with those in the Martis Valley Community Plan, as it was adopted by Placer County in 2003. Although, as noted by the commentor, there was a legal challenge to the Martis Valley Community Plan's EIR, that case has now been resolved. Therefore, the assumptions and data contained in that document are valid and represent an appropriate basis for analysis in the Draft EIR. As suggested by CEQA guidelines section 15130, the projections used for the TAZ's encompassing Martis Valley are summarized in Table 5-1, below. It should be noted that the land uses for Martis Valley are either greater than or equal to those currently proposed for the Siller Ranch, Timilick at Tahoe, Northstar Highlands and Northside projects.

Appendix A also describes how growth at the external nodes was estimated in the model. In general, the build out of the North Shore Community Plans was assumed, as well as the build out of the Squaw Valley area. Growth rates from the Caltrans Statewide traffic model were used to estimate growth along SR 89 to the north, and I-80 to the east and west. The growth at the airport was estimated based upon the growth rate identified in the Truckee Tahoe Airport Master Plan (November, 1998).

TABLE 5-1 **DEVELOPMENT ASSUMPTIONS FOR MARTIS VALLEY
 COMMUNITY PLAN TAZs**

Land Use	Development Amount
Single Family Residential	5,080 units
Multi-Family Residential	3,520 units
Commercial	600 (1,000 square feet of floor area)
Office	69.5 (1,000 square feet of floor area)
Lodging	225 rooms
Golf Course	126 holes

6-19: Chapter 4.3: Biological Resources will be amended as appropriate to reference the various natural features listed in the comment and can be found in Chapter 3 of this Final EIR. Although these features represent additional examples of biological resources that could be affected by the proposed project, the project level analysis in the Draft EIR does address them, along with other similar features in Truckee and the Sphere. The same proposed 2025 General Plan policies identified in the Draft EIR that would mitigate potential impacts to a less than significant level would also apply to these resources. Thus the findings and conclusions of the Draft EIR remain valid, and no changes are needed to them.

6-20: This comment serves as background and introduction to the more detailed comments that follow. Each of the topics introduced in this section are addressed in detail in the responses to comments below.

- 6-21: This comment restates the findings of the Draft EIR with regard to impacts to population, employment and housing. No response is necessary.
- 6-22: The comment states that the Draft EIR's analysis is inadequate because it fails to analyze impacts to the jobs/housing balance that would result from implementation of the proposed 2025 General Plan. CEQA Section does not require an analysis of the sort requested by the commentor, nor does the Town of Truckee have any adopted threshold or standard of significance regarding jobs/housing balance. As is concluded in the Draft EIR, the proposed 2025 General Plan reflects a series of goals, policies, and programs, representing feasible efforts by the Town to address and improve existing and future conditions for both jobs and housing, resulting in a less than significant project impact.

Although the various analyses suggested by the commentor might provide some interesting discussion, they would provide no greater ability to conclusively say what the impacts of the proposed 2025 General Plan's implementation might be, particularly over the long term and on a regional level. Indeed, it would be speculative for the Draft EIR to attempt to project, for a 20 year planning horizon, the range of employment types that could occur in the future, the specific match, over the long term, between those particular jobs and the exact profile and location of housing types at various levels of affordability. External forces, growth and development in other parts of the region and the State, broader demographic, economic, and market trends, as well as personal choice on the part of individuals will likely dictate the ultimate balance of jobs and housing and the commute patterns of those who live and work in Truckee, rather than any specific policies of the proposed 2025 General Plan.

Since the analysis presented in the Draft EIR is adequate and appropriate, no changes are needed.

6-23: The comment suggests that the proposed 2025 General Plan could result in displacement of population, due to rising housing costs which force residents to relocate in other communities. Rising housing costs have been a notable trend in Truckee in recent years, just as they have throughout the State and many other places in the US. This trend is the result of numerous factors, including low interest rates, the overall state of the California economy, and demographic shifts. Thus, it would be unreasonable to attribute a decrease in housing affordability as a direct or indirect impact of the proposed 2025 General Plan that can be traced to any of its particular goals, policies or land use designations. Indeed, contradictory to this assertion, the proposed 2025 General Plan's goals and policies, explicitly seek the provision of more affordable housing in the Town. These policies support those of the recently adopted Housing Element, the certification of which by the California Department of Housing and Community Development (HCD) implicitly acknowledges that the Town has in place sufficient policies and programs to meet its share of regional housing demand.

The findings of the Draft EIR remain valid, and no changes are needed.

6-24: As noted by the commentor, the Draft EIR concludes that growth in the Town may cumulatively contribute to the overall demand for affordable housing in the region. Since the proposed 2025 General Plan would allow new job-generating development to occur, it could contribute to the overall, cumulative regional housing demand, since, even despite the best efforts of the Town, some employees may choose or be forced to seek housing outside of Truckee, just as some who are employed in other parts of the region may choose or be forced to seek housing in Truckee. The level of analysis provided in the Draft EIR to accompany this assessment is entirely appropriate for this program level document, particularly in consideration of cumulative impacts.

CEQA discourages speculation in an EIR's analysis (CEQA Guidelines Section 15145). For the same range of reasons outlined in the second paragraph of response 6-22, and to a greater extent for a cumulative analysis, the Draft EIR appropriately refrains from such speculative discussion. Thus, no changes are needed to the Draft EIR or its analysis or findings.

- 6-25: This comment suggests a series of additional mitigation measures related to population, housing and employment. Since there are no project-level impacts identified in these areas, there is no need to incorporate these policies in the proposed 2025 General Plan, or as Mitigation Measures in the Draft EIR. Additionally, since cumulative impacts were determined to be significant and unavoidable, any policies that the Town could enact would not, by themselves resolve the regional housing impact identified in the EIR. However, the Town may consider these suggested policies for incorporation into the Final 2025 General Plan, prior to its adoption.
- 6-26: This comment introduces the more detailed comments provided in subsequent paragraphs concerning the traffic and circulation impact analysis. These specific comments are addressed in responses 6-27 through 6-29, below.
- 6-27: Please see response to comment 6-9, 6-10, and 6-17, above.
- 6-28: This comment suggests that the DEIR should have included an analysis of the direct and indirect environmental impacts of all traffic improvements identified in the DEIR and whether those improvements are feasible. Traffic modeling was done for that purpose as shown in Table 4.13-10 of the DEIR.

The General Plan policies proposed require that specific levels of service (LOS) be maintained and establish the criteria for project level review of the potential environmental impacts of the projects

necessary to maintain that LOS and any alternatives to those projects. The DEIR acknowledges that, in certain cases, delay in the implementation of improvements may result in an unavoidable significant impact to those intersections. The DEIR therefore provides a valid and adequate analysis of the potential impacts associated with the proposed general plan and no additional modeling or analysis is required.

6-29: This comment suggests a series of additional mitigation measures related to traffic and circulation. Since there are no project-level impacts identified in these areas, and any policies that the Town could enact would not, by themselves be likely to resolve the cumulative traffic issues identified in the Draft EIR, there is no need to incorporate these policies in the proposed 2025 General Plan, or as Mitigation Measures in the Draft EIR. However, the Town will consider these suggested policies for incorporation into the Final 2025 General Plan, prior to its adoption.

6-30: This comment suggests that visual simulations or detailed maps showing the relationship between proposed development and visually sensitive areas should have been prepared to support the Draft EIR's conclusions that the proposed 2025 General Plan would have a less than significant impact with regard to visual resources. As a program-level document, preparation of visual simulations that purported to show, with any degree of accuracy or verisimilitude, the future visual character of the Town, would not be practical, nor would it provide valid evidence that would alter the conclusions or analysis of the Draft EIR. The same is true for mapping of visually sensitive areas and potential future development. In this case, issues of sightlines, perspective, and individually attainable public views could not be meaningfully analyzed on a community-wide level.

Regarding the Sphere, it should be noted that the proposed 2025 General Plan's land use designations for the Sphere reflect designa-

tion already put in place by Nevada County. Therefore, neither the proposed 2025 General Plan, nor the future annexation and incorporation of these lands would, in and of themselves, result in the development of these areas. Regardless, at the program level of analysis, it is not possible to say precisely where or how in the Sphere of Influence new development might occur, and as such, the proposed 2025 General Plan's reliance on policy statements to address the potential visual impacts associated with the location and appearance of new development would serve as adequate mitigation.

No change to the Draft EIR is required.

NB. This comment also mentions "biologically significant areas." Since the bulk of this comment clearly pertains to the Draft EIR's discussion of visual impacts, the reader is referred to later responses to comments in which the Draft EIR's analysis of biological resource impacts are directly addressed.

- 6-31: This comment suggests a series of additional mitigation measures related to visual impacts. Since there are no project-level impacts identified in this areas, and any policies that the Town could enact would not, by themselves be likely to resolve the cumulative impact to visual resources identified in the EIR, there is no need to incorporate these policies in the proposed 2025 General Plan, or as Mitigation Measures in the Draft EIR. Nonetheless, the Town will consider them for inclusion in the Final 2025 General Plan, prior to its adoption.
- 6-32: This comment states that the Draft EIR's analysis of impacts to biological resources are inadequate, because it does not, for example, quantify acres of habitat that would be urbanized under the proposed 2025 General Plan's land uses. The Land Use Map, shown in Figure 3-4, and Table 3-2 show where development would be allowed to occur in the future. However, as a program document, the Draft EIR

cannot reasonably quantify, in the way suggested by the commentor, the exact location of future development relative to habitat areas on a finer-grained level. Habitat areas within a specific area, or even on a specific parcel can be of widely varying quality and value, depending on a multitude of site specific factors. Equally, an individual development project may have a widely variable footprint, or other characteristics of design or location that would influence its relative effect on important biological resources. Such impacts would appropriately be assessed on a project specific basis. The program-level analysis presented in the Draft EIR is adequate to inform the discussion of environmental impacts, and no changes are needed.

6-33: See response to comment 6-19, above.

6-34: See response to comment 6-32.

6-35: The comment suggests that the Draft EIR does not adequately address impacts to biological resources, particularly issues of habitat fragmentation, direct loss of habitat that could occur, and indirect impacts from clustered and low-density development.

The commentor is correct to note that the issues of habitat fragmentation and of indirect impacts to sensitive habitat in the Town and the Sphere, are not explicitly addressed in the Draft EIR. However, the Draft EIR does implicitly addresses these issues in its discussion of biological resources impacts. Any new development (including clustered and low density development) might result in increases in human presence in previously uninhabited areas, introduction of roads and infrastructure, and cause effects that might potentially result in increased fragmentation of wildlife habitat, and/or increased

likelihood of direct and indirect impacts, which may be significant if not addressed by policies or other mitigation.⁸

However, as noted in the Draft EIR, the proposed 2025 General Plan seeks, through its policies and programs to minimize or avoid such impacts to habitat, which would include habitat fragmentation. Habitat fragmentation is addressed in Policy P1.1 under Goal COS-1, which calls for the acquisition and preservation of large blocks of undeveloped open space, and open space corridors that provide connections between different open space areas. Policy P1.5 similarly suggests as priorities for open space preserved by direct actions of the Town, land that occurs in large blocks and is contiguous and connected, and that provides maximum habitat value. This would include, by implication, areas which would reduce the likelihood of habitat fragmentation. The specific identification of priority lands for such preservation, and thus the sorts of habitat lands listed above, is listed as a key point in development of the proposed Open Space Acquisition Plan that the proposed 2025 General Plan calls for in Action A1.2. Policy P4.1 calls for preservation of the integrity and continuity of biological resources open space and habitat; and Policy P4.2 would protect sensitive land from destruction and intrusion from incompatible land uses, considering prevention of habitat fragmentation as a key concern. Action A4.1 would require preparation of a plan to manage and protect sensitive biological resources, prioritizing areas for management and protection that are likely to be impacted by development, and Action A4.2, calls for, as part of such a Plan, ongoing monitoring of the overall health of sensitive habitat resources that could result in refinement of proposed 2025 General Plan policies. Together, these policies and actions would reduce the

⁸ Regarding the Sphere, as noted in response 6-30, above, the Draft General Plan's land use designations for the Sphere reflect designation already put in place by Nevada County. Therefore, neither the Draft General Plan, nor the future annexation and incorporation of these lands would, in and of themselves, result in the development of these areas.

potential impacts of development allowed under the proposed 2025 General Plan to a less than significant level. The text of the Draft EIR has been amended to clarify this analysis and conclusion regarding habitat fragmentation.

As with other sorts of impacts, indirect impacts to habitat would be analyzed as part of project-level studies at the time individual projects would be proposed and built, and appropriate mitigations incorporated to minimize impacts, in accordance with proposed 2025 General Plan policies and CEQA requirements. The policies cited above, along with Conservation and Open Space Element Action A4.3, which calls for development of guidelines concerning development adjacent to sensitive wildlife habitats, would also mitigate potential impacts to a less than significant level. The text of the Draft EIR has been amended to incorporate explicit reference to indirect habitat impacts, and to reflect this analysis and conclusion.

Although the policies of the proposed 2025 General Plan would mitigate the projected impacts to a less than significant level, and no additional mitigation is required by CEQA. However, the Town will consider these suggestions for policies relating to habitat fragmentation for incorporation into the Final 2025 General Plan, prior to its adoption.

- 6-36: This comment includes a number of suggested mitigation measures related to biological resources impacts. No significant project-level impacts were found, and the significant and unavoidable cumulative impact could not be mitigated to a less than significant level solely on the basis of these suggested policies. Nonetheless, the Town will consider them for inclusion in the Final 2025 General Plan, prior to its adoption.

- 6-37: This comment provides background an introduction to the subsequent comment regarding the Draft EIR’s analysis of growth-inducing impacts. Since this comment does not contain a substantive comment on the Draft EIR, no response is required.
- 6-38: This comment suggests that the direct and indirect growth-inducing impacts of the project are not adequately analyzed in the Draft EIR, or adequately supported by facts or analysis.

As a program level document, the Draft EIR’s qualitatively-oriented and broad-brush analysis of growth inducing impacts presents an appropriate level of detail and analysis. The discussion of direct growth inducing impacts appropriately notes that the proposed 2025 General Plan would designate lands for development, and thus would induce growth within its project area, which in this case would encompass the Town Limits and the Proposed Sphere of Influence. The proposed 2025 General Plan’s land use and policy framework only pertains to the area within the specific boundaries of the Town Limits and Sphere, and, as such, would not directly induce growth outside of them. It also notes some of the specific policies and programs that would direct that growth in an orderly and planned manner, and would minimize environmental impacts.

As previously noted in these responses to comments, the level of development in the Sphere is already accounted for in the land use designations applied to this area by Nevada County, and as such, annexation and incorporation of these lands into the Town would not, in and of itself, result in new growth or development that was not otherwise foreseen.

Like the Draft EIR’s discussion of direct impact, the discussion of indirect impacts is presented at a broad level of detail and analysis, primarily because it would be speculative to try and project the amount of growth related to growth in the Town and its Sphere,

versus that caused by other economic factors or demographic trends in the region, or encouraged through the planning and policies of Placer County or Nevada County. It would be particularly speculative to comment on the exact type or location of that growth, particularly as it may occur over the long-term planning horizon of the proposed 2025 General Plan. As noted in the Draft EIR, the proposed 2025 General Plan's supports orderly and logical patterns of growth in the surrounding region, and makes all feasible efforts to provide adequate housing and employment opportunities for its own residents, such that growth pressures and indirect growth inducing impacts on adjacent communities and the region would be minimized.

No changes are needed to the analysis or conclusions of the Draft EIR.

- 6-39: This comment calls out two specific ways in which the commentor believes the proposed 2025 General Plan might induce growth, that should have been analyzed in the Draft EIR. The commentor suggests that there may be other growth-inducing aspects that should be considered, but does not elaborate on what they may be, precluding a direct response.

The first potentially growth-inducing factor suggested by the commentor relates to potential increases in the housing affordability gap, resulting in pressure on adjacent communities to accommodate that growth. The reader is referred to response to comment 6-23, which notes that the proposed 2025 General Plan, rather than supporting or encouraging an affordability gap, instead vigorously supports the provision of affordable housing, as well as the development of higher-wage jobs to enable Truckee residents to afford local housing. The certification of the Town's 2005 Housing Element also demonstrates that the Town has in place a series of feasible policies and programs to address its share of the affordable housing need. Thus,

rather than pressuring adjacent communities to provide housing, the proposed 2025 General Plan would seek to accommodate its own housing demand for all sectors of the population, and may, indeed, absorb unmet affordable housing demand from elsewhere in the region.

The second way the commentator suggests the proposed 2025 General Plan may induce growth is through extension of services into the proposed Sphere of Influence, thereby removing barriers to growth beyond the Sphere. Under the proposed 2025 General Plan, the Town does not plan to extend utilities or infrastructure over which it has control, such as roads, outside of these boundaries. The Special Districts which provide other utilities to the Truckee area have planned for an orderly extension of services, in accordance with the Town's planned patterns of growth and development, as well as policies of Nevada County that reflect the County's land use designation for the proposed Sphere. Action A8.2 in the proposed 2025 General Plan calls for development of annexation policies that note that the most appropriate areas for planned urban development outside the Town Limits include those where infrastructure is already planned, followed by those that are within the service boundaries of those providers.

No changes are needed to the analysis or findings of the Draft EIR.

- 6-40: This comment suggests that mitigation measures listed elsewhere in the comment letter should be incorporated into the proposed 2025 General Plan, in order to reduce growth-inducing impacts of the project to a less than significant level. Since no significant growth-inducing impacts were found, there is no need for additional mitigation measures or policies to be incorporated. Nonetheless, the Town will consider them for inclusion in the Final 2025 General Plan, prior to its adoption.

- 6-41: This comment suggests that growth in the Sphere was not adequately accounted for in the project analysis. See response to comment 6-10.
- 6-42: This comment suggests that the analysis of growth inducing impacts should include as description of privately held land in the Planning Area that could develop if the proposed Sphere were to be annexed and services extended to development areas there. Please see the third paragraph of response to comment 6-39, above.
- 6-43: This comment suggests that the alternatives analysis is flawed, on the basis that the impact analysis failed to adequately disclose all of the impacts of the project, and thus, the alternatives cannot, as is required by CEQA, address the reduction of those impacts. As is discussed in various of the responses to comments, above, the commentor's assertion regarding the adequacy of the impact analysis is respectfully found to be incorrect. Therefore the alternatives analysis remains valid in this particular respect, and no changes are needed to it.
- 6-44: The comment suggests that the Draft EIR's Alternatives analysis failed to meet the requirements of CEQA Guidelines section 15126.6 regarding the presentation of a "reasonable range of alternatives that would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen the significant effects of the project." Subsequent comments provide additional detail on the ways in which the commentor suggests the Draft EIR's analysis might be flawed, and the reader is thus referred to responses to comments 6-45 and 6-46, below.
- 6-45: The comment suggests that the complete range of physical and regulatory constraints to development should have been factored into one or more of the alternatives, which would have provided a more realistic basis for understanding the actual development that could have occurred under each alternative. Although it is not explicitly

stated, the comment implies that the only feasible, and/or realistic alternative to be considered is one based on adherence to existing town policies and environmental and physical constraints to development.

While not based on the precise methodology suggested by the commentor, the range of alternatives presented and analyzed in the Draft EIR does, to some extent, reflect the considerations suggested by the commentor. Both the location of sites to which the development scenarios were applied, and the scenarios themselves were determined by the Town as reflecting realistic and reasonable options for future development, including consideration of known development constraints. In fact, the small number of sites among which different development scenarios were created for the alternatives represent the relatively limited range of sites in the town for which changes to existing land use designations, (and thus to future development on those sites) was considered appropriate and/or desirable. The selection of these sites was made on the basis of input from the Town, and from the public.

Regarding the consideration of alternatives for development in the SOI, the existing land use designations in this area were considered to remain valid, and, on the basis of environmental review completed for the 1996 General Plan, and for the Draft EIR on the proposed 2025 General Plan, to not be subject to significant environmental impacts from future development under current designations, to which the alternatives needed to respond.

In addition, implicit in all of the alternatives is the assumption that development under the alternative in question, on each individual site, would be responsive to site constraints as well as to applicable regulatory requirements, which would dictate the ultimate amount and location of growth. In the opinion of the Town, the alternatives do reflect a reasonable and feasible range of alternatives, with the capacity to lessen various of the environmental impacts of the pro-

posed 2025 General Plan, and so there is no need to revise the alternatives analysis as the commentor suggests.

- 6-46: This comment suggests that the “Mixed Use and Outlying Open Space” alternative should have been amended to eliminate one component, development of the Airport Flat site, that resulted in greater overall impacts of the alternative that caused it to rank below others in the assessment.

Although the visual and biological impacts of development of Airport Flat in that alternative resulted in comparatively worse impacts in these two areas than some of the other alternatives, other environmental impacts unrelated to development at Airport Flat were also judged to be comparatively worse, including traffic impacts to Donner Pass Road. Compared to the Increased Residential Development alternative that was deemed the “environmentally superior alternative,” the Mixed Use Alternative had comparatively worse traffic, air quality and noise impacts, none of which were related to development on Airport Flat. The alternatives analysis is adequate and valid, and no revisions are needed to the Draft EIR.

- 6-47: Please see responses to comments 6-45 and 6-46.

- 6-48: This comment concludes the comment letter, and reiterates, in general terms, the contents of the comments that are addressed in greater detail above, and to which the reader is referred. No additional response is required.

LETTER #7



July 7, 2006

Stacy Wydra
Town of Truckee Planning Department
10183 Truckee Airport Road
Truckee, CA 96161

Dear Stacy,

Thank you for this opportunity for the Truckee Trails Foundation to comment on the Circulation Element of the draft Truckee 2025 General Plan update.

In general, we found the section titled "Trail and Bikeway System" to be a very good summary of the Town's trail and bikeways priorities. We do feel that it is worth mentioning in this section that there is a partnership in place between the Town of Truckee and the Truckee Trails Foundation to update and add a final level of detail to the *Truckee Trails and Bikeways Master Plan* and that this effort will be completed this year. We also found inaccuracies in Figure CIR-2 "Existing and Proposed Trail and Bikeway Network" that we have listed for your convenience below in Attachment 1. Related to this, there should be language in the document reflecting the partnership between the Town of Truckee and the Truckee Trails Foundation to install numbered bike route signs throughout the town and develop a corresponding bike map to formalize Truckee's Class III bike routes.

7-1

7-2

Overall, we are very pleased with the Town's commitment to growing our community's trails and bikeways network and believe this commitment is reflected in the Circulation Element of the draft Truckee 2025 General Plan update.

Sincerely,

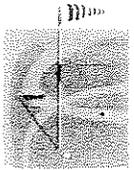
A handwritten signature in black ink, appearing to read "Leigh Fitzpatrick".

Leigh Fitzpatrick
Executive Director
Truckee Trails Foundation

CC: Truckee Trails Foundation Board of Directors

LETTER 7: Leigh Fitzpatrick, Executive Director. Truckee Trails Foundation. Received July 7, 2006. The attachment to this document can be found in the 2025 General Plan Final EIR Public Comment Appendix.

- 7-1 The commentor agrees that the section titled “Trail and Bikeway System” found in the Circulation Element is a very good summary of the Town of Truckee’s bikeway priorities. The commentor asks that partnership between the Town of Truckee and the Truckee Trails Foundation be acknowledged regarding the development of the Truckee Trails and Bikeway Master Plan. This suggested acknowledgement will be considered for inclusion into the text of Chapter 4 of the proposed 2025 General Plan prior to its adoption. The comment addresses the proposed 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.
- 7-2 This commentor found several inaccuracies in Figure CIR-2 of the Circulation Element which is reproduced as Figure 3-8 in the Draft EIR. The request changes are reflected in a revised version of the Figure 3-8 included in Chapter 3 of this Final EIR, and the proposed 2025 General Plan will be similarly corrected prior to its adoption. Since the comment does not address the adequacy of the Draft EIR, no additional change to the Draft EIR is required.



PGC Partnership
P.O. Box 332
Sunol, CA 94586

PONDEROSA GOLF COURSE

LETTER #8

JUN 20 2006

Phone: 925-484-5222
Club House: 530-587-3501
Fax: 925-426-9369

Email: teeoff@ponderosagolfclub.com

**Received By
Planning Division**

JUN 20 2006

June 15, 2006

Mr. Duane Hall
Planning Manager
TOWN OF TRUCKEE
10183 Truckee Airport Road
Truckee, CA 96161-3306

RE: GENERAL PLAN UPDATE – ENVIRONMENTAL IMPACT REPORT COMMENTS

Dear Duane:

After reviewing the Draft 2025 General Plan Update, the Draft Environmental Impact Report, and attending the General Plan Review Session last week, we wanted to submit the following comments regarding the General Plan and E.I.R.

As you know, our family has owned and operated the Ponderosa Golf Course since 1963. While our family resides in the Bay Area, we have been active members of the community of Truckee for the past 40+ years, operating this seasonal 9-hole golf course continuously since then. Over the past four decades, much has changed in the Town of Truckee, the Tahoe Basin and the golf industry. The fact that we have remained in business here for 43 years is a testament to our ability to change with the times. In fact, we would suggest that we are one of the oldest, continually owned family operated businesses in Truckee.

As with most businesses, much has changed during the past 40 years. When Ponderosa Golf Course was developed, 9-hole golf courses were prominent and sustainable, given the golf economy. As the development business and the golf business changed in succeeding decades, we now find that golf courses are no longer built as “stand-alone” recreational facilities, as they were back in the 60’s and 70’s. Starting in the 1980’s and continuing at an ever-increasing rate through the present, golf courses are now built as an amenity to the development of large residential communities. They are no longer seen as a profit center, but rather as an additional recreation facility to promote these large housing developments. With Truckee as a destination recreation area, you are no doubt aware that each of the five new championship golf courses planned or under construction in and around Truckee are being

built as an amenity to housing developments which have or will create some 6,000 new housing units, most of which will be built for people who do not live or work in the community of Truckee. Not only in Truckee, but throughout the Tahoe Basin and in Reno (not to mention almost every Indian Casino in Northern California and Nevada), we have seen these types of developments over the last two decades adding numerable golf courses to the region. This trend is nationwide, and as such, the golf industry has found itself overbuilt. Ponderosa Golf Course has not escaped this trend, and, in fact, 9-hole "stand-alone" courses are shutting down all over the country because of the increased competition with the overabundance of championship 18-hole golf courses.

These golf course communities have the ability to operate their golf courses at a loss, a luxury we cannot afford at Ponderosa Golf Course. Just as local "mom and pop" hardware stores find it difficult to compete with the likes of Home Depot and Lowe's, the days are numbered for "stand-alone", 9-hole golf courses, a business model that no longer works in the golf industry of the Twenty First Century. In many of the General Plan Update public forums there have been some who have expressed their desire for the golf course to stay in its present form. Those who do, often cite the reason as the local support for Ponderosa Golf Course. But those statements are not reflected in the number of rounds that are played at Ponderosa. In fact, since our desires about redesigning the course have been made public in 2003, we have seen the number of rounds at Ponderosa decrease by 14% alone, and 25% since 1998.

8-1

When Truckee began discussions of a General Plan Update, we approached the Town about the possibility of looking at a different land use for Ponderosa Golf Course in the long term. This property is entirely surrounded by development, or proposed development, which is either commercial or residential in nature. It is a likely parcel of land for development within the Town when the Golf Course is no longer economically viable. As the GPU progressed, we participated in the Town sponsored General Plan Workshops, had neighborhood meetings, and dealt with a variety of people in the community in looking at alternatives for the property. The Proposal to put a Special Study Area designation on the land made the most sense, given the clarity of the future of this 9-hole course. In addition, we discussed with the Truckee-Donner Recreation & Parks Department, the possibility of keeping a shorter, executive, Par 3 course, which would be dedicated to the community. Such a course would also provide a buffer and open space for the existing residents along Reynold Way.

We believe that the direction we are going will be the best for the community, the neighbors and the owners of Ponderosa Golf Course for many reasons. We encourage the Town Council, Planning Commission and Staff to support adoption of the General Plan Update as proposed, specifically, with respect to Ponderosa Golf Course. The E.I.R. alternatives would not provide an avenue for the Town to control the future of this property as it would in a Special Study Area. The reality is that Ponderosa Golf Course will close in the next couple of years, given the current economic climate in the golf industry which we do not expect to change. Competitive situations in Truckee and the Tahoe Basin will only get worse as many new championship courses come on line. As such, the Himsl family will shut down the golf operation, and the land will become fallow.

Leaving the property as open space will encourage a future developer to look at a vacant 52.96 acre parcel as a blank sheet of paper on which to plan its project. There will be pressure on the Town to consider such a project via a General Plan Amendment, a process which all communities make available to the public three times per year, as mandated by California law. Brockway Road is not a main commercial artery, thus, the idea of locating heavier commercial uses in this area are not warranted, especially with the prospects of PC-3 at the corner of Brockway and Hwy 267, now in the planning phases. The fact that the property is entirely surrounded by existing development, the majority of which is residential, leads one to believe that a combination of open space and residential, as discussed in the 2025 General Plan, is the best long term alternative for the parcel. Again this parcel will become fallow in the near future and, as an infill parcel, it seems wiser to develop this area as infill, rather than to keep expanding the community on the fringe of its Town limits.

As mentioned above, the Recreation & Park District has expressed an interest in owning and operating an Executive Par 3 course, for the benefit of the community. Once the golf course is shut down, the redevelopment of such a facility becomes much more difficult, given the fact that the General Plan Update, as written, calls for no new golf courses. The fact that this Golf Course might shut down and the land become vacant for a number of years before any development could happen on the site, could mandate that no golf course would ever be allowed to come back to the Ponderosa Golf Course location. Thus, we feel a seamless move from the existing 9-hole course to an Executive Par 3 course, in addition up to 150 units of residential housing, most of which will be designed to accommodate full time Truckee residents, is the best alternative to be studied by the community.

We have had opposition from a number of the property owners along Reynold Way, regarding closure of the Golf Course. As mentioned, since this is a private course, such a decision is not theirs to make and is dictated by the golf economy and prudent business practice. Thus we are trying to provide a solution that will be in the best interests of our neighbors. In our plan, we would designate three development envelopes ("A", "B" and "C"), as depicted on the attached diagram, for possible future residential development. All homes along Reynold Way that currently back to the Golf Course would continue to back to the Golf Course under our long range development scenario. The revised Executive Par 3 Course would buffer the existing homes from any new development, and in fact, would become less vulnerable to stray golf balls as we would reverse the direction of play which takes many of these homes out of the hazard zone. This would be a professionally redesigned Executive Par 3 golf course that would create more opportunities for children, seniors and the handicapped to enjoy golf. There are abundant amounts of golf programs designed for such courses that have been very successful throughout the country.

Questions have been raised regarding this property's location in reference to the Airport. The majority of the property is located in the "Airport Area D", which encourages any residential development to be clustered as referenced in Paragraph 3.1.3(b) of the Airport Master Plan, a concept we have taken into consideration in our design concept.

Mr. Duane Hall
Planning Manager
TOWN OF TRUCKEE
June 13, 2006
Page 4

In closing, we would ask Staff, the Planning Commission and Town Council to support the 2025 General Plan Update and proposed Project Alternative in the Draft Environmental Impact Report. Our long term plan would be to work with the community through a Special Study Area designation and develop a Master Plan for the site which would retain an Executive Par 3 golf course and open space on the majority of the land, buffering the existing residents along Reynold Way from any new development. We will work with the community to have public meetings and gain community input for the development of the site. The alternative would be that the Ponderosa Golf Course will shut down and the land will become fallow in the near future. The adoption of the existing 2025 General Plan Update does not grant any specific entitlements to Ponderosa Golf Course, but rather only allows it to ask for a development plan which will be scrutinized in great detail by the community under the guidelines of your Special Study Area designation.

8-1

We look forward to working with the Town of Truckee and the community in providing a quality project on this site, one which would include a publicly owned golf course that the community can enjoy for many decades to come.

Sincerely,

PONDEROSA GOLF COURSE



Robert Himsl
Partner

Enclosures: PGC Redesign Project Map
Letter from Steve Randall, Truckee Donner Recreation and Park District dated 10/18/04

LETTER 8: Robert Himsl, Partner. Ponderosa Golf Course. June 15, 2006. The attachments to this document can be found in the 2025 General Plan Final EIR Public Comment Appendix.

8-1 This comment agrees with the Draft EIR and asks that the Town Council and Planning Commission adopt the Draft 2025 General Plan as is. No additional response is required.

LETTER #9

RECEIVED

PINE FOREST OWNERS' ASSOCIATION TRUCKEE, CALIFORNIA

Managed by CAMCO
900 Northstar Drive
Truckee, CA 96161-4204
Telephone 530-562-0378
Toll-free 800-916-2262
Fax line 530-562-0379
E-mail camcomgmt@aol.com

July 7, 2006

Duane Hall
Truckee Community Development Department
10183 Truckee Airport Road
Truckee, CA 96161

Re: Comments on the Truckee 2025 General Plan Update Draft EIR for Pine Forest at Truckee Homeowners' Association

Dear Duane,

We respectfully suggest that the Draft EIR address/incorporate the following:

- 1) Land Use Category No. 8 (Figure 3-4)

Pine Forest HOA objects to the new "Industrial" Land Use Designation for this area and believes it should remain "Residential" as shown on the existing General Plan Land Use Map. This area is immediately adjacent to/southerly of the Pine Forest at Truckee development. Lots along the Pine Forest at Truckee southerly boundary will be significantly impacted from a visual standpoint if Industrial development is permitted in this area. Further, this area has steep slopes and constructing large industrial buildings will require a significant amount of site grading and tree removal and will generally diminish the aesthetic atmosphere currently enjoyed by Pine Forest at Truckee residents.

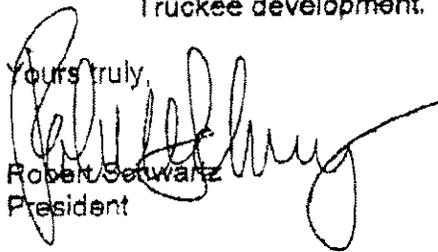
9-1

- 2) The Circulation Plan (Figure 3-7)

The gray road shown through the Pine Forest at Truckee development should be removed. This road alignment was previously part of the old subdivision map of the property and was abandoned with Pine Forest at Truckee project approval. Reflecting that road alignment allows for a future roadway connection that adversely impacts the Pine Forest at Truckee development.

9-2

Yours truly,



Robert Schwartz
President

LETTER 9: Robert Schwartz, President. Pine Forest Homeowners Association. July 7, 2006.

- 9-1 The commentor does not support the redesignation of the area immediately adjacent to/southerly of the Pine Forest at Truckee development. The commentor cites concerns regarding the aesthetic impact of industrial development, including the effects of grading and tree removal that could occur under the proposed 2025 General Plan Land Use designations. The comment addresses the proposed 2025 General Plan and not the adequacy of the Draft EIR. However, as noted in the Draft EIR Chapter 4.1, the proposed 2025 General Plan includes a series of goals, policies, and actions intended to preserve the aesthetic and scenic qualities of the town, including application of design standards and guidelines, and regulations regarding hillside development and grading. All development in the Town of Truckee would be subject to such requirements, including the industrial uses noted in the comment. Further, individual development projects would be subject to design review and pursuant to CEQA evaluations on potential aesthetic impacts to public views. Since no changes are needed to the Draft EIR's findings and analysis, no additional changes to the Draft EIR is required.
- 9-2 The commentor suggests a correction to Figure 3-7 in the Draft EIR. The requested change is reflected in a revised version of the Figure 3-7 included in Chapter 3 of this Final EIR. The comment does not address the adequacy of the Draft EIR, so no additional change to the Draft EIR is required.

June 20, 2006

Mr. Duane Hall, Planner
Planning Commissioners
City of Truckee
10183 Truckee Airport Rd.
Truckee, CA 96161

RECEIVED
JUN 26 2006
Received By
Planning Division

Re. Ponderosa Golf Course & Draft General Plan

Thank you for your recent e-mail to us regarding the 2025 General Plan and the Public Review Draft of May 15, 2006 section 2-26 and 27.

We suggest that the wording in SSA2-P2 read as follows: **Any new non-open space uses proposed for the site are required to demonstrate that they support preservation of the majority of the site as a regulation 9 hole golf course par 35 of no less than 2,600 yards.**

10-1

That SSA2-P5 read as follows: **The Town should support efforts for the area to remain as a 9 hole regulation golf course par 35 that is open to the general public, and that is reasonably affordable to its users.**

Consideration for the rezoning of the Ponderosa Golf Course being addressed in the draft element of the 2025 General Plan is an important issue that will have a major impact on the home owners on this golf course as well as the city as a whole.

Is not the purpose of a City's General Plan to meet the impending demands and needs of the city in years to come and to address environmental concerns? How did the 53 acres known as the Ponderosa Golf Course get in to the mix of this draft general plan? It surely was not a need for residential housing. Did it become an issue at the written request of the owners of the golf course who wish to profit from this move claiming to be losing money operating the course? If this be the case, why is the city accommodating such a request in a general plan revision? If the owners wish to rezone their property should they not file an application through the normal channels of the city? Perhaps it is because a zoning application and change which would require a full EIR and would be costly. Using the vehicle of the general plan they incur virtually no cost. The city should not be processing requests to alter its zoning in a general plan at the whims of an owner who claims to be losing money operating a commercial enterprise. That is not the purpose of a general plan.

10-2

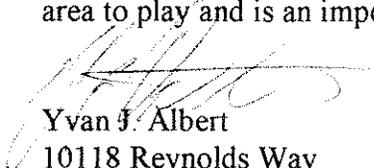
The owners acquired this golf course from the utility company for approximately \$160,000 and have profited from the venture for many years without making any substantial capital improvements. They increase their fees yearly and have let competition with new and improved facilities draw away their players. They have made

little effort to market their course. Management of the course has declined in recent years since the departure of Alex Stewart the long time manager and partner.

The family heirs of Ponderosa can improve their income by building a better club house, a restaurant and bar , a driving range and provide better incentives for parties to play the course. They should also consider selling the property and city should consider its acquisition for an extension of its park system. This would be a valuable asset to the City which has become a popular recreational destination.

10-2

Although there are a number of new courses in the community, most of them are extremely expensive to play and most of these courses are part of an upscale residential development. This course remains as the only one affordable for locals and seniors in the area to play and is an important asset to the growth of Truckee.



Yvan J. Albert
10118 Reynolds Way
Truckee, CA

**LETTER 10: Yvan J. Albert, 10118 Reynolds Way, Truckee, CA.
June 20, 2006.**

- 10-1 The commentor suggests rewording of two Special Study Area Policies: SSA2-P2 and SSA2-P5. The suggested rewording does not alter the adequacy of the current policy wording. The comment addresses the proposed 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.
- 10-2 The commentor does not support the redesignation of the Ponderosa Golf Course. The commentor also speculates about why the redesignation of the golf course is being addressed in the proposed 2025 General Plan. The commentor recommends several business strategies for maintaining the viability of the golf course. The comment addresses the proposed 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.

Duane Hall

From: Ronnie Colby [writetheworld@sbcglobal.net]
Sent: Monday, June 26, 2006 5:19 PM
To: dhall@townoftruckee.org; info@trucke2025.org
Subject: Comments, Draft General Plan

Dear Mr. Hall,

Thanks for accepting my comments a bit late. I look forward to hearing from you and continuing to work with you for a better Truckee.

Ronnie Colby
Truckee, CA

11-1

Ronnie Colby
13964 Tyrol Road
Truckee, CA 96161
writetheworld@sbcglobal.net

Mr. Duane Hall
Town Planner
Town of Truckee
10183 Truckee Airport Road
Truckee, CA 96161

Dear Mr. Hall et al,

June 25, 2006

Below are my points of concern regarding different sections of the Truckee Draft General Plan. I appreciate the time it takes to read through it and other citizens' comments. Please consider them carefully and reply with any questions.

1. Note - page 6-5, Economic Development Element – photo by Darin Dinsmore is NOT of Tahoe Forest hospital. It is of the medical building across from the hospital on Donner Pass Road.

11-1

2. Open Space Recreation, page 2-15, Land Use Element
(re. Golf courses as open space)

“This land use designation is applied to areas where developed recreational uses would be compatible with the natural resources in the area. This designation is intended to minimize suburban and rural residential sprawl; to protect significant vistas, wildlife movement corridors, biological resource areas; and to accommodate recreational uses. Lands designated OSR serve as a buffer between the more intensive development in the Gray’s Crossing Specific Plan Area and the RC/OS uses in the eastern portion of Town. This designation differs from the RC/OS designation in that it allows for more intensive, clustered recreational/residential development where appropriate.”

11-2

“Land Uses Allowed: Land uses allowed under this designation are recreational uses that are compatible with the natural surroundings, such as skiing, camping, existing and currently approved golf courses, horseback riding, as well as clustered residential or lodging uses.”

As a professional greenskeeper for seven years and avid golfer for ten years, I find the suggestion that a golf course is somehow “compatible with the natural surroundings” utterly contradictory and sadly laughable. The interests who succeeded in getting this association made between golf courses and open space must be thrilled. Please consider:

Golf courses are private for profit entities who forbid trespassing by non-paying citizens. That alone negates the necessary conditions of “open space” in most peoples’ minds.

(Yes, skiing, camping, horseback riding, and lodging are similar.) But gold courses are a unique animal, more so than the rest mentioned here. Let me address golf courses' specific defiance of all those aforementioned intentions.

How do golf courses "minimize suburban and rural residential sprawl?" Do they not in fact exacerbate such sprawling, often exclusive, developments? (Does such exclusivity fall into some part of the community character element with which I am unfamiliar?) How many folks from Tahoe Donner, Coyote Moon, Old Greenwood, or other courses (Ponderosa maybe excepted) bike or walk into town regularly?

How do golf courses "protect significant vistas?" Do they not require the elimination and severe modification of the "natural surroundings" due to the earth moved, trees razed, and the like? Where is the compatibility with "the natural surroundings with regard to "significant vistas?"

How do golf courses protect "wildlife movement corridors?" In my experience, golf courses in fact severely alter or destroy wildlife movement corridors. People do not like thinking about small birds or animals paralyzed by fear and run over by a giant mower. It happens – regularly. Birds sheltered by forests' canopies are removed, and all kinds of small mammals are forced to flee (here, martens, raccoons, skunks, coyotes, marmots, golden mantled squirrels, even deer and bear, etc...). Often, this means that a migratory route will move closer to a road, to homes (occupied by people typically unfamiliar with how to live with wildlife), or elsewhere that is not a traditional wildlife corridor.

11-2

How does a golf course protect "significant biological resource areas?" What native plants are replaced by farmed, fertilizer-laden sod? Is water a significant biological resource? Are pre-existing streams and watersheds biological resources? The thought that damage to such areas can be mitigated (as is typically done by golf course developers) is a concept alien to nature and bioregions everywhere. Golf courses require excessive water that comes from aquifers and/or rivers that need this water. Some estimates find daily watering totals between 300,000 and 500,000 gallons per day. In San Antonio, TX, a round of golf for one person works out to 2200 to 3500 gallons of water. In 1999, the UN deemed fresh water has been as one of the two most likely causes of civil strife in the 21st century. (The other likely cause named by the UN was the growing gap between rich and poor, interestingly.)

About all golf courses actually do, as stated by the paragraph specifying the designation's intentions, is serve as a place for some to recreate. If I still played golf, though, I could not afford to play any area course – not even Tahoe Donner's, where I live.

Nature is not necessarily exclusive. Golf courses all are. Nature does not carelessly destroy habitat yet golf courses do. Even with their well-intended mitigation efforts, the damage to the area is done and will continue for years. The damage from fertilizers, pesticides, fungicides, algacides, diesel powered mowers, where they are washed off, the oil they all leak, and the emissions they all spew are hardly "compatible with the natural

surroundings.” None of the other activities mentioned alongside golf have such a detrimental impact on the natural landscape.

I fully object to golf courses being considered anything but private for profit businesses. They are hardly open, the space they take up is unnaturally created, and the recreation so exclusive that only an extremely small percentage of area citizens can afford to patronize a course. Furthermore, I fully object to the development of additional golf courses in the Truckee area (including that proposed at Gray’s Crossing). We have enough; they are reputable, and they are the “destination vacations” that Truckee thinks is so valuable.

11-2

Somehow on page 2-58, P6.5, after it is written that Gray’s Crossing will feature a new 18 hole golf course, it’s stated that no new golf courses will be built in Truckee. Why doesn’t it say “forever,” or in perpetuity?” Will the future larger Truckee somehow allow for a golf course to be built?

2. The Truckee Railyard

p. 35 - “DSA-P8. Develop the old mill site (the Railyard) as a location for future mixed use development, including both local- and tourist-serving commercial uses, as well as residences, and public uses, incorporating the suggested components described in Action A7.1 in the Community Character Element.”

p. 59 - “A6.4 Develop a master plan for the Railyard Master Plan Area in the Downtown as a location for future mixed use development, including both local and tourist-serving commercial and public uses. The Plan shall address the need for and construction of a second access road from the Railyard to the south.”

11-3

I would like to strongly encourage the Town to make what may be a major change to these specifications. Allow for light industrial use. Allow for a rail spur, where one or two railcars (max.) could stop and unload or be loaded onto.

The undervaluing of the railroad as a passenger and commercial transporter has amazed me ever since I was a child. Why wouldn’t Truckee want more passenger access by train? Why wouldn’t Truckee want to bring in and export more commercial and industrial materials by train? Why would Truckee confine itself to access by automobile traffic only? The train comes through Truckee several times daily. Each car hauls far more than any 18-wheeler. The train provides potentially critical secondary/backup routes in and out of Truckee (which seems especially important given winters and road closures in the past. Why will the train become a decoration on Truckee’s lapel? This makes no sense. No matter how long it takes and how much negotiation needed, a rail spur in Truckee would not only add to the real historical value of the town, but it would ease the import costs for area businesses, make passenger travel more viable and a bigger economic force in town, and allow for a back-up, secondary way of importing and exporting goods. There is

currently just one real way east and west to and from Truckee – the highway. The train provides a smart back-up that works in perfect conjunction with Truckee’s history and existing infrastructure.

11-3

I strongly encourage the addition of a small rail spur for commercial and industrial use, and I strongly urge the Town to utilize the railroad, not just relegate it to its official Town logo.

3. Fostering Green business – what’s there to make it actually happen

(From p.1, Economic Development Element)

“The Economic Development Element of the General Plan is directed toward fostering a healthy, balanced year-round economy in Truckee in order to provide a broad range of economic opportunity for all Truckee residents. It supports the Vision for Truckee by providing a framework of guiding principles, goals, policies and actions that encourage a diverse and sustainable year-round economy in Truckee while maintaining the Town’s community character and high quality of life, and ability to maintain superior community services.”

As I search this 14 page Economic Development Element for the words “green,” “energy,” “renewable,” the prefix “bio,” and the word “sustainable,” only this latter word appears – once. It’s vaguely placed and explained at that.

11-4

Sierra College is indeed to be welcomed to Truckee. Their proposed AA with an emphasis on Sustainability is wise and certain to be a model for schools across the country. But what kind of high quality vocational or technical training is available here? Three quarters of the jobs here require little or no college education, and therefore don’t foster that development of “high-wage jobs in Truckee that enable the local workforce to both live and work in the Town.” Most of these jobs are seasonal, too, complicating matters more.

P2.1, page 6-7 – “Provide sufficient business park and light industrial space to allow for the attraction and expansion of quality employers within Truckee.”

There is very little such space in Truckee, and where it is to be found, it starts at 1 million dollars. As someone personally seeking to bring a “green business” to Truckee, the limitations are numerous. In addition to being met with confusion over how to zone my particular business (due to the fact that it’s – inappropriately – deemed a “new technology”), I am faced with zero help from a Town purportedly interested in improving quality of life through “new technology” and with extremely unaffordable land and choices re. where to establish my business. Of course, international and large corporate chains find no obstacle in doing business here, where land prices exceed the reach of local entrepreneurs.

What is Truckee doing specifically to change this fact? Where are the incentives for bringing “sustainable” businesses to Truckee? I have many friends so inclined, many of whom also have advanced degrees, Truckee’s and the community’s interests at hand, and a simple desire to both keep Truckee what it was when we first moved here and to make this place last, and we find the real, on-the-ground assistance and incentives from Truckee lacking. All in all, this leaves me quite concerned with the development of a truly sustainable Truckee.

11-4

Thanks for your time ~

Ronnie Colby
Truckee, CA

LETTER 11: Ronnie Colby, Truckee, CA. June 25, 2006.

- 11-1 The commentor suggests a correction to a photo caption in the Economic Development Element in the proposed 2025 General Plan. This correction will be made to reflect the appropriate caption prior to its adoption. The comment does not address the adequacy of the Draft EIR, so no additional change to the Draft EIR is required.
- 11-2 The commentor does not support the redesignation of the Ponderosa Golf Course proposed in the 2025 General Plan. The commentor also outlines several reasons why the redesignation of the golf course should not occur and presents a series of comments about way in which golf courses are addressed in the proposed 2025 General Plan. The comment addresses the Draft 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.
- 11-3 The commentor makes a number of suggestions regarding the land uses allowed at the Railyards and regarding rail as a means of transportation. The comment does not address the adequacy of the Draft EIR, so no additional change to the Draft EIR is required.
- 11-4 The commentor expresses a variety of opinions regarding “green business” as reflected in the proposed 2025 General Plan’s Economic Development Element. The comment addresses the proposed 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.

TC
Tommy
Dunne
John

June 2, 2006

LETTER #12

City Council
Town of Truckee
10183 Truckee Airport Road
Truckee, CA 96161

Dear Council Members:

I am writing to you to encourage you not to change the zoning of the land occupied by the Ponderosa Golf Course. I have been playing there for the last 20 years. One of the main reasons I like the course is the natural beauty of the course and the surrounding area. The "open space" of that area is particularly attractive. If the land is rezoned and then occupied by housing, Truckee will lose one of its jewels. With all the talk these days about preserving open space and protecting the environment, your decision to leave the current zoning intact and thereby preserve the golf course and the surrounding area so many have enjoyed, would please many generations to come. Please act responsibly and protect one of Truckee's valuable assets.

12-1

Regards,



Ronald Gregg
7045 Elmsdale Dr
San Jose, Ca 95120
ronaldgregg@sbcglobal.net

**LETTER 12: Ronald Gregg, 7045 Elmsdale Drive, San Jose, CA.
June 2, 2006.**

12-1 The commentor does not support the redesignation of the Ponderosa Golf Course. The commentor also outlines several reasons why the redesignation of the golf course should not occur. The comment addresses the proposed 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.

LETTER #13**Duane Hall**

From: Tony Lashbrook [tlashbrook@townoftruckee.com]
Sent: Monday, June 26, 2006 8:15 AM
To: 'Duane Hall'; 'John McLaughlin'
Subject: FW: Public Comment for Truckee 2025 General Plan

From: Town Of Truckee [mailto:truckee@townoftruckee.com]
Sent: Tuesday, June 20, 2006 3:39 PM
To: 'Tony Lashbrook'; 'Barbara Green'; 'Beth Ingalls'; Craig Threshie; Josh Susman; 'Richard Anderson'
Subject: FW: Public Comment for Truckee 2025 General Plan

From: breathepeace@cebridge.net [mailto:breathepeace@cebridge.net]
Sent: Tuesday, June 20, 2006 12:19 AM
To: truckee@townoftruckee.com
Cc: breathepeace@cebridge.net
Subject: Public Comment for Truckee 2025 General Plan

Attention: Beth Ingalls, Richard Anderson, Craig Threshie, Josh Susman, and Barbara Green

Thank you in advance for considering the opinions of Truckee residents as you work to shape this sweet mountain town. We have two comments, in regards to the issues of transportation and aesthetics.

Truckee is a small town with great potential for activating public transportation. In chapter 4, the "Circulation Element" section, we read about "automobile use...primary mode of transportation in Truckee..." Do we want the town of Truckee to be able to handle greater volumes of traffic, or do we want to promote alternative forms of transportation? Conserving resources and building community are the waves of the future. We want to see Truckee as a leader in this, and we can do it by focusing our energies on developing an accessible public transportation system. For example, a bus could make regular runs to the new Sierra College location. This will alleviate issues of negative watershed impact and reduced air quality from increasing amounts of vehicle emissions. Also, traffic and parking drama will subside along with feelings of isolation (since sharing transportation builds community). Aspen and Breckenridge, Colorado are models for successful public transit. These mountain towns provide public transportation for both tourists and residents who fill the buses and bike lanes. (More information is available at www.rfta.com and www.summitcolorado.com/breckenridge-free-ride.php.) We'd like to see Truckee make public transportation a priority!

13-1

Regarding the town's character, we'd like to see those parking meters become aesthetically tasteful. How about getting students involved in painting a historic timeline on the meters. A couple of the meters could even represent what this 2025 General Plan imagines Truckee to become.

13-2

Thank you again. We look forward to seeing this town continue to grow with vibrance and mountain goodness!

Sincerely,

Liz Levy, 530.414.1175, breathepeace@cebridge.net

Cari Bivona, 530.519.0757, cari@sustaintahoe.com

Monique Monteverde, 530.448.9813, greenmountain@gmail.com

Ann Marie Sheridan, 530.448.9014, vinyasa@care2.net

LETTER 13: Liz Levy, Cari Bivona, Monique Monteverde, and Ann Marie Sheridan, email. Received June 26, 2006.

- 13-1 The commentor does not support the characterization in the Circulation Element in the proposed 2025 General Plan that describes “automobile use....primary mode of transportation in Truckee...” The commentor suggests several ways and examples of how to better promote multi-modal and public transportation. The comment addresses the proposed 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.
- 13-2: The comment refers to a desire to the Town’s parking meters decorated in a aesthetically tasteful manner. The comment is acknowledged and does not address the adequacy of the Draft EIR, so no additional change to the Draft EIR is required.

6-7-06

I do hope you consider the impact that Pondrose Golf course has on the town.

It is near the sports park, and the most reasonable to play, an open to all. as a home owner we bought our lots from the golf course owner believing that we would be on a 9 hole golf course not a reduced size.

Please consider everyone in your decision - (homeowners)

Sharon Saubert
Reynolds way.
209-524-5772

14-1

Received By
Planning Division

JUN 07 2006

**LETTER 14: Sharron Paukert, Reynolds Way, Truckee, CA.
June 7, 2006.**

14-1 The commentor does not support the redesignation of the Ponderosa Golf Course. The commentor also outlines several reasons why the redesignation of the golf course should not occur. The comment addresses the Draft 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.

LETTER #15**Duane Hall**

From: Tony Lashbrook [tflashbrook@townoftruckee.com]
Sent: Tuesday, June 20, 2006 1:07 PM
To: 'Town Of Truckee'; 'Barbara Green'; 'Beth Ingalls'; 'Craig Threshie'; 'Josh Susman'; 'Richard Anderson'
Cc: 'Duane Hall'; jprice@townoftruckee.com; 'John McLaughlin'; dwilkins@townoftruckee.com; dchase@townoftruckee.com; Bob Johnston; Cadie Olsen; 'Cole Butler'; Nancy Richards; Nikki Riley
Subject: RE: A Public Comment for Truckee 2025 General Plan

From: Me_shell [mailto:mitchsharron@yahoo.com]
Sent: Tuesday, June 20, 2006 12:19 PM
To: truckee@townoftruckee.com
Subject: A Public Comment for Truckee 2025 General Plan

Attention: Beth Ingalls, Richard Anderson, Craig Threshie, Josh Susman, and Barbara Green

Thank you in advance for considering the opinions of Truckee residents as you work to shape our town. I have one comment, in regards to the issues of transportation.

In chapter 4, the "Circulation Element" section, I read "automobile use...primary mode of transportation in Truckee..."

I would love to see Truckee promote other forms of transportation. I love to ride my bike to do my errands. I moved up here to spend time outdoors, I like to ride for health, and I'm even more motivated to ride due to gas prices. However, there are very few bike lanes, there are almost no place to park my bike and motorists and not very aware of, nor do they appreciate, how to share the road with cyclists. San Francisco, which many people here deride as the big bad terrible city has more bike lanes, better bikes lanes, places to park your bike and cyclists have a very high profile within the city. There's manned bike parking at most major events such as baseball games and concerts, where bikers can park their bikes in a secure place. Granted, most of this is due to a highly galvanized bike community but wouldn't it be great for Truckee to take the lead? Also, where is our public transportation? Even if a shuttle just stopped at each entrance to Sierra Meadows to run downtown and/or to Kings Beach/Tahoe City, I'd much rather take that than drive myself. You cause more air pollution just starting up your car than you do driving it, so I'd be happy not to turn it on at all.

I hear a lot of noise about Truckee being the "greenest town" in California but quite frankly, that is just not true. Until we have public transportation and encourage alternative modes of travel, we are just blowing hot air, causing traffic, air pollution, contributing to ill health, adding noise and congestion, and fooling ourselves that saying we care is the same as actually taking action.

Sincerely,
 Michelle Sharron
 homeowner, Sierra Meadows

15-1

**Received By
 Planning Division**

JUN 20 2006

LETTER 15: Michelle Sharron, Sierra Meadows, email. Received June 20, 2006.

15-1 The commentor does not support the characterization in the Circulation Element in the Draft 2025 General Plan that describes “automobile use....primary mode of transportation in Truckee...” The commentor suggests several ways and examples of how to better promote multi-modal and public transportation. The comment addresses the Draft 2025 General Plan and not the adequacy of the Draft EIR. No additional change to the Draft EIR is required.