

Yumie Dahn

From: Eben Swain <eswain@truckeeriverwc.org>
Sent: Tuesday, October 12, 2021 2:59 PM
To: Yumie Dahn
Cc: Lisa Wallace
Subject: Truckee River Watershed Council - Comments - Estates Drive, Affordable Housing IS/MND - Oct. 12, 2021
Attachments: TRWC Comment Estates Drive Affordable Housing 10.12.2021.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Yumi;

The Truckee River Watershed Council has reviewed the Initial Study Mitigated Negative Declaration (IS/MND) and the associated documents for the Estates Drive, Affordable Housing Project – Thank you for providing this opportunity! We are submitting a final comment letter, acknowledging the progress that has been made in the effort to protect wetland habitat and biological resources within the Town of Truckee limits and emphasizing the need for continued diligence in minimizing impacts to these resources both during active construction and after construction is completed.

Please accept and review the comments submitted on behalf of the Truckee River Watershed Council – our mission is to bring the community *Together for the Truckee* to protect, enhance, and restore the Truckee River watershed. We appreciate the opportunity to provide comment on this project and are recognize the need for additional affordable housing units within the Town of Truckee.

Please feel free to contact me via the information noted below if you have any questions on our comments, or would like to discuss in more detail. Thank you for your time and consideration in this matter, we are happy to continue to work with yourself and other members of the Town as the planning process continues to move forward.



Eben Swain, Program Manager | 530.550.8760 x7#
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October 12, 2020

Yumie Dahn, Associate Planner
Town of Truckee
10183 Truckee Airport Road
Truckee, CA 96161
Via ydahn@townoftruckee.com

RE: Project Routing for Estates Drive Affordable Housing – Initial Study/Mitigated negative Declaration Public Review Draft.

Dear Ms. Dahn,

Thank you for the opportunity to comment on the Estates Drive Affordable Housing-Initial Study/Mitigated Negative Declaration (IS/MND) Public Review Draft. The Truckee River Watershed Council (TRWC) is pleased to see another proposed housing project in town.

As you know, our mission is to bring the community *Together for the Truckee* to protect, enhance, and restore the Truckee River watershed. We identify, coordinate, fund, and implement restoration and preservation projects directly related to the watershed's health, beauty, and economy. As such, we are interested in the proposed project.

We have previously commented on this project in October 2019 and in December, 2020 (attached for reference). We appreciate the considerations of the Town of Truckee and the project proponents have shown as a response. Upon review of the Public Review Draft IS/MND we have noted, appreciate and agree with, and strongly recommend the following mitigation measures be adopted with no diminishment for biological resources (specifically wetland habitat):

- No excavation under any circumstances in areas delineated as wetland
- Install and maintain filter/sediment fencing between construction site and wetland areas
- Show on plan set and obtain approval from Town that any concrete walkways in close proximity to wetlands shall drain away from

wetlands. During construction, areas should also be inspected by Town representative to ensure compliance.

- No use of meadow mats or equivalent from Oct 15 to May . Outside of these dates meadow mats may be installed and utilized under supervision of a wetland scientist and subject to Town inspections to ensure compliance.
- If wetland areas are disturbed, restoration to pre-disturbance conditions will be required.

Likewise, we noted, appreciate and agree with, and strongly recommend the following guidance: "Because construction will be occurring in closer proximity to wetlands than is usual and the measures needed for protection of the wetlands are somewhat more stringent than normal, a pre-construction meeting including on-site construction supervision staff, Town representation, and a knowledgeable wetland scientist shall be held to ensure that measures are rigorously implemented but are refined for compatibility with construction practicalities, if needed."

Lastly, due to the close proximity of proposed snow storage areas to the wetland fringe, we are concerned about the potential impacts of road sands and other pollutants if they are allowed to transfer into the existing wetland habitat either during or after construction. We encourage continued diligence and regular inspections to reduce any potential impacts to wetland habitat. We also strongly recommend implementation and maintenance of appropriate erosion control and protection measures be established prior to and throughout the snow removal season to ensure the health and functioning of one of the last wetlands within the Town boundary.

Thank you again for the opportunity to comment on the proposed project routing. TRWC is pleased to see another housing development proposal and is happy to meet to discuss our comments further.

Sincerely,



Lisa Wallace
Executive Director



Eben Swain
Program Manager

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Truckee River Watershed Council
Estates Drive Affordable Housing
Comment letters previously submitted



December 2, 2020

Yumie Dahn, Associate Planner
Town of Truckee
10183 Truckee Airport Road
Truckee, CA 96161
Via ydahn@townoftruckee.com

RE: Project Routing for Estates Drive Affordable Housing Preliminary Application

Dear Ms. Dahn,

Thank you for the opportunity to comment on the Estates Drive Affordable Housing Preliminary Application. The Truckee River Watershed Council (TRWC) is pleased to see another proposed housing project in town.

As you know, our mission is to bring the community *Together for the Truckee* to protect, enhance, and restore the Truckee River watershed. We identify, coordinate, fund, and implement restoration and preservation projects directly related to the watershed's health, beauty, and economy. As such, we are interested in the proposed project.

We originally commented on this project in October, 2019 and appreciate the considerations of the Town of Truckee and the project proponents have shown as a response to our original comment letter (*attached for reference*). We recommend that the following project components remain in place as requirements to the project:

Our two main comments are 1) proposed layout relative to existing wetland resources and 2) set backs and proximity of the project to the restored "Truckee Meadows" wetlands. We also suggest that there are a number of other items for consideration. More specifically, our comments and suggestions are:

1. Wetland protection: Maintain protection of existing wetland areas as identified and delineated by Eco Synthesis Scientific & Regulatory Services, INC. This includes the wetland habitat in both the south-west corner and the south-east corner of the proposed

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project footprint. Wetland and riparian habitats with Town limits have been significantly reduced over the last 150 years. It would be beneficial to all parties if these impacts can be avoided or minimized.

2. Setbacks and proximity—Maintain the current location of buildings and associated infrastructure (i.e. parking stalls) that are noted in the preliminary plan set. We recognize that there are space constraints on this property, and appreciate the effort to minimize impacts to the existing wetland habitat.
3. Biological studies—While we are still concerned about the potential for adverse indirect impacts on the wildlife that utilizes the adjacent wetland habitat for foraging, nesting and as a migratory corridor, we understand that there is substantial urbanization present in all areas surrounding the proposed project. We recommend that additional surveys, and if necessary, mitigation measures follow the requirements of CEQA and other regulations established by environmental permitting agencies.
4. Mitigation—If mitigation is necessary for any impacts on wetland habitat, or wildlife species, TRWC recommends that mitigation for the proposed project be completed within the Truckee River watershed.
5. Storm water—We appreciate the attention to detail in addressing the stormwater issues that will result from the proposed project and the incorporation of LID techniques (vegetated swales, etc.) that are noted in the preliminary plan set. We recommend implementing and maintaining these practices, both through project construction and in the long-term, and hope that these practices will be incorporated in future development projects.
6. Snow storage— We recognize that space is limited for both parking and for snow storage, and also recognize that there is a large undeveloped parcel east of the project site that may be utilized for excess snow storage. The current layout described in the preliminary plan set appears to avoid impacts of snowmelt and associated pollutants to the identified wetland habitat within the project site. We recommend maintaining this layout, and as much as possible, avoiding any impacts to wetland habitat or water quality as a result of planned snow storage locations.

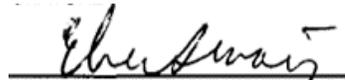
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Thank you again for the opportunity to comment on the proposed project routing. TRWC is pleased to see another housing development proposal and is happy to meet with the Town or proponents, as appropriate, to discuss our comments further.

Sincerely,



Lisa Wallace
Executive Director



Eben Swain
Program Manager



October 17, 2019

Yumie Dahn, Associate Planner
Town of Truckee
10183 Truckee Airport Road
Truckee, CA 96161
Via ydahn@townoftruckee.com

RE: Project Routing for Estates Drive Affordable Housing Preliminary Application

Dear Ms. Dahn,

Thank you for the opportunity to comment on the Estates Drive Affordable Housing Preliminary Application. The Truckee River Watershed Council (TRWC) is pleased to see another proposed housing project in town.

As you know, our mission is to bring the community *Together for the Truckee* to protect, enhance, and restore the Truckee River watershed. We identify, coordinate, fund, and implement restoration and preservation projects directly related to the watershed's health, beauty, and economy. As such, we are interested in the proposed project.

We have some suggestions for the Town and proponents to consider. We are happy to discuss these further with both parties if appropriate.

Our two main comments are 1) proposed layout relative to existing wetland resources and 2) set backs and proximity of the project to the restored "Truckee Meadows" wetlands. We also suggest that there are a number of other items for consideration. More specifically, our comments and suggestions are:

1. Proposed layout—The proposed layout would have direct and indirect impacts to multiple existing wetland resources on the property. Were design alternatives considered to minimize or avoid these impacts? Wetland and riparian habitats with Town limits have been significantly reduced over the last 150 years. It would be beneficial to all parties if these impacts can be avoided or minimized.

2. Setbacks and proximity—The 2017-2018 Truckee Meadows Restoration Project increased wetland habitat quality and quantity on properties adjacent to the proposed project area. The bird response, for example, has been quite dramatic and species such as the willow flycatcher are utilizing the site. The setbacks defined in the site plan create a close proximity of the project and may negatively affect (directly or indirectly) this flourishing wildlife and wetland habitat.
3. Cumulative effect—There are several projects being proposed or developed in the vicinity. The cumulative effects of these projects on adjacent wetland and wildlife habitats need to be considered to inform permitting and environmental compliance.
4. Wetland delineation—The 2015 wetland delineation included in the preliminary application does not reflect current conditions on or adjacent the project area.
5. Biological studies—There is significant wildlife usage of the open space on and adjacent the project area. Biological studies should be completed to inform the application.
6. Mitigation—TRWC recommends that wetland mitigation for the proposed project be completed within the Truckee River watershed.
7. Storm water—Storm water management was not discussed in the preliminary application. As noted in our River Revitalization Watershed Assessment ([Balance Hydrologics 2018](#)) the stream drainage just west of River View Drive is highly eroded and unstable. Additional stormwater inputs from this development would further degrade that system. Moreover, the on-site and adjacent wetlands will require protection from stormwater inputs.
8. Snow storage— The preliminary application does not discuss snow storage. Where will snow from the current and proposed housing be stored? The present day practice of using this parcel for snow storage will not be able to be continued.

Thank you again for the opportunity to comment on the proposed project routing. TRWC is pleased to see another housing

development proposal and is happy to meet with the Town or proponents, as appropriate, to discuss our comments further.

Sincerely,



Lisa Wallace
Executive Director



Matt Freitas
Program Manager

Yumie Dahn

From: Eben Swain <eswain@truckeeriverwc.org>
Sent: Monday, October 18, 2021 2:20 PM
To: Yumie Dahn
Subject: Re: Truckee River Watershed Council - Comments - Estates Drive, Affordable Housing IS/MND - Oct. 12, 2021

Follow Up Flag: Follow up
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Yumie – apparently I had mis-read section IV-2 below. I thought the language was stating that the concrete walkways should be graded to avoid wetland areas, not into the (avoided) wetland areas. I also see the reasoning for allowing precip and snow accumulation to remain in close proximity to wetland habitat for purposes of groundwater recharge, etc. Ultimately any potential contribution of sediments or other pollutants from concrete walkways should be fairly minimal.

I have spoken with Adrian @ Ecosynthesis and we are in agreement that the language in his/Ecosynthesis report is accurate in terms of addressing/supplementing the hydrology of the wetland fringe, and that any sediments or other accumulation of materials is of minimal concern. I understand you need to publish any public comments, including those compiled and submitted by the Watershed Council, however if you feel it is worthwhile for me to revise, or provide a slight addendum, I am happy to do so. Ultimately, just want to clarify that the Watershed Council is in agreement with the assessment and recommendations conducted by Ecosynthesis and that, moving forward, there will be no conflict between our comments and Ecosynthesis recommendations.

Thanks!



Eben Swain, Program Manager | 530.550.8760 x7#

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From: Yumie Dahn <YDahn@townoftruckee.com>
Sent: Tuesday, October 12, 2021 5:01 PM
To: Eben Swain <eswain@truckeeriverwc.org>
Cc: Lisa Wallace <lwallace@truckeeriverwc.org>
Subject: RE: Truckee River Watershed Council - Comments - Estates Drive, Affordable Housing IS/MND - Oct. 12, 2021

Hi Eben,

I noted in your comments that you stated that you thought that the concrete walkways should drain away from the avoided wetlands. However, in the biological resources study, Ecosynthesis suggested requiring the walkways to drain into the wetlands to maintain the hydrology.

I'm not sure which is the correct method; I can see the reasoning behind either option. Can you clarify?

IV-2. *Prior to approval of improvement plans, the plans shall show that the concrete walkways in the area immediately surrounding wetland FEW-4 are graded to drain into the avoided wetland/upland area, and to the extent feasible, snow from the same proximal walkways should be cleared into the avoided area, supplementing the area's hydrology in a manner analogous to preserving a larger surrounding watershed. The requirements of this mitigation measure shall be verified by the Town of Truckee during review and approval of project improvement plans.*

-Yumie

From: Eben Swain <eswain@truckeeriverwc.org>

Sent: Tuesday, October 12, 2021 2:59 PM

To: Yumie Dahn <YDahn@townoftruckee.com>

Cc: Lisa Wallace <lwallace@truckeeriverwc.org>

Subject: Truckee River Watershed Council - Comments - Estates Drive, Affordable Housing IS/MND - Oct. 12, 2021

Dear Yumi;

The Truckee River Watershed Council has reviewed the Initial Study Mitigated Negative Declaration (IS/MND) and the associated documents for the Estates Drive, Affordable Housing Project – Thank you for providing this opportunity! We are submitting a final comment letter, acknowledging the progress that has been made in the effort to protect wetland habitat and biological resources within the Town of Truckee limits and emphasizing the need for continued diligence in minimizing impacts to these resources both during active construction and after construction is completed.

Please accept and review the comments submitted on behalf of the Truckee River Watershed Council – our mission is to bring the community *Together for the Truckee* to protect, enhance, and restore the Truckee River watershed. We appreciate the opportunity to provide comment on this project and are recognize the need for additional affordable housing units within the Town of Truckee.

Please feel free to contact me via the information noted below if you have any questions on our comments, or would like to discuss in more detail. Thank you for your time and consideration in this matter, we are happy to continue to work with yourself and other members of the Town as the planning process continues to move forward.



Eben Swain, Program Manager | 530.550.8760 x7#

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Yumie Dahn

From: Eben Swain <eswain@truckeeriverwc.org>
Sent: Thursday, April 28, 2022 10:58 AM
To: Yumie Dahn; Lisa Wallace
Subject: RE: Estates Meadows Project

Yumie – we have reviewed the revised changes and associated documents associated with the Estates Meadows Housing Project and do not have any additional comments on the proposed revisions at this time.

We would however like to reiterate and emphasize our previously noted points as follows:

- No excavation under any circumstances in areas delineated as wetland. Pre-construction meetings should be held to ensure that measures are rigorously implemented, but are refined for compatibility with construction practicalities, if needed.
- Install and maintain filter/sediment fencing between construction site and wetland areas
- Show on plan set and obtain approval from Town that any concrete walkways in close proximity to wetlands shall drain away from wetlands. During construction, areas should also be inspected by Town representative to ensure compliance.
- We encourage continued diligence and regular inspections to reduce any potential impacts to wetland habitat. We also strongly recommend implementation and maintenance of appropriate erosion control and protection measures be established prior to and throughout the snow removal season to ensure the health and functioning of one of the last wetlands within the Town boundary.
- No use of meadow mats or equivalent from Oct 15 to May . Outside of these dates meadow mats may be installed and utilized under supervision of a wetland scientist and subject to Town inspections to ensure compliance.
- If wetland areas are disturbed, restoration to pre-disturbance conditions will be required.

Thank you for the opportunity to review and provide comment on the current revisions to project components and the design plan set, we look forward to continuing to work with you in the future.



Eben Swain, Project Director | 530.550.8760 x7#
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From: Yumie Dahn <YDahn@townoftruckee.com>
Sent: Wednesday, April 20, 2022 5:13 PM
To: Lisa Wallace <lwallace@truckeeriverwc.org>; Eben Swain <eswain@truckeeriverwc.org>
Subject: Estates Meadows Project

Hi Lisa and Eben,

The applicants for the Estates Meadows Project have resubmitted their project with some revisions. If you would like to review the changes please see the project plans here:

<https://www.townoftruckee.com/government/community-development/planning-division/growth-and-development/major-development-projects/estates-meadows-housing-development>

If you have any comments or insight, please feel free to forward them along. We are aiming for the May 17, 2022 Planning Commission meeting for the next review.

Sincerely,

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Yumie Dahn, AICP
Senior Planner
530-582-2918