

December 11, 2023, revised March 12, 2024

Town of Truckee
Attn: Lucas Kannall
10183 Truckee Airport Road
Truckee, CA 96161

**Subject: Letter of Justification for Development Permit Application for the KidZone Museum Project
– APN: 019-450-035**

Dear Lucas,

The proposed KidZone Museum Project requires approval of the following entitlements from the Town of Truckee:

1. Development Permit Application for a new children's museum and associated site improvements.

A new location for the KidZone Museum, a children's museum, on an approximately 1.7 acre parcel leased from Truckee Donner Recreation and Park District in the Truckee River Park. A copy of the lease is provided with this submittal. The proposed Project features a 10,500-square-foot building with 30 parking spaces.

The future Project will require the following ministerial approvals from the Town of Truckee, which will be submitted as a separate application:

1. Grading Permit(s)
2. Building Permit(s)

PROPOSED USE

The Project site is intended for a children's museum with indoor and outdoor exhibit/learning spaces and operating hours of 7 AM to 9 PM Monday through Saturday and 9 AM to 6 PM.

1. The proposed development is:
 - a. Allowed by Article II (Zoning Districts and Allowable Land Uses) within the applicable zoning district with the approval of a Development Permit, and complies with all applicable provisions of the Truckee Development Code, Municipal Code, and Public Improvement and Engineering Standards as follows:

GENERAL SITE INFORMATION

- **Existing Parcel APN:** 019-450-035
- **Existing Parcel Size:** 19.02 acres
- **Project Site:** 10010 Estates Drive, Truckee, CA 96161
- **Zoning:** PF (Public Facilities)
- **Building Setbacks:** Front: 20 FT

(TOT Code 18.16.040) Sides: Determined through land use permit process.
Rear: Determined through land use permit process.
Street-side: Determined through land use permit process.

Project Compliance: The Project site is an approximately 1.7 acre area within APN 019-450-035. KidZone leased this area from Truckee Donner Parks and Recreation. A copy of the lease is provided with this submittal. The full 19.02 acre parcel is zoned as PF, Public Facilities. Table 2-10 allows for museums within this zone that are operated by a nonprofit, like KidZone, that operates similar to a public agency. The Project design has included a 20 FT minimum setback from all leased property lines: front, sides and back.

TYPICAL DEVELOPMENT STANDARDS

- **Site Coverage (TOT Code 18.16.040):** Determined through land use permit process.

Project compliance: The approximately 1.7 acre (74,052 SF) site will have a 10,500 SF building and 23,901 SF of paving. This calculates to site coverage of area of 47%.

- **Height Limit (TOT Code 18.16.040):** 35' or 3.5 stories, whichever is less

Project compliance: The Project is a 1 story building with a 30 FT building height which is under the 3.5 story or 35 FT height limit.

- **Snow Storage (TOT Code 18.30.130):** 50% of total parking/driveway areas for snow loads <200 lbs/SF. Snow load at the Project APN is 174 lbs/SF.

Project compliance: As is allowable by section 18.30.130.b.4.a, the Project requests approval to reduce the snow storage area requirement by 50% by using ramping on existing site slopes as shown in the plans. The total parking and driveway areas are 17,400 SF. 50% of this area is 8,700 SF of snow storage. A 50% reduction to this area is 4,350 SF. The Project provides 4,490 SF of snow storage.

- **Landscaping (TOT Code 18.40 & 18.42):** Provide landscaping:

1. Setbacks. In all front and side setbacks, except where BMP/parking/sidewalks are within setback;
2. Disturbed areas. In all disturbed areas (1 tree & 4 shrubs per 100 SF);
3. Parking areas:
 - A. Adjacent to streets - 6' wide landscaping b/w ROW and parking; 1 tree per 20 LF, 1 shrub per 5 LF
 - B. Adjacent to side or rear PLs – 6' wide landscaping; 1 tree per 20 LF, 1 shrub per 5 LF
 - C. Within a parking area: 200 SF landscaping per 5 parking spaces; 2 trees & 4 shrubs per 5 spaces
 - D. For all street buffers, 5' wide along all street frontage; 1 tree per 20 LF, 1 shrub per 5 LF

Project compliance: The Project does not meet requirements for disturbed areas because this would constitute an unhealthy overcrowding of plant material. All disturbed areas are stabilized by several means including paving, mulching, seeding and planting. The Project also does not meet the requirements for parking areas adjacent to streets, side or rear of the parking lot or within the parking area. The area adjacent to the street cannot be planted because it is a Liberty easement. The areas to the rear of the

parking lot are snow storage areas that negate the use of trees and shrubs. This area will be stabilized with jute netting and seeding. Within the parking area, there is limited space available due to parking and snow storage requirements. See Landscape plan for calculations and implementation.

- **Wetlands (TOT Code 18.46.040):**

- B. Preservation Requirements. Areas designated as environmentally sensitive shall remain in their natural and undisturbed state and shall be maintained in a manner which minimizes the danger of fire hazards.
- C. Disturbance and restoration of wetlands. Review authority may approve a minor use permit for disturbance of wetlands if all the following findings can be made:
 - 1. The wetlands cannot be avoided and there are no feasible alternatives or mitigation to disturbance of the wetlands;
 - 2. Any wetlands removed or destroyed as part of the Project are mitigated by the restoration or creation of wetland habitat at a rate of 1.5 to 1; and
 - 3. The disturbance and/or removal of the wetlands complies with all applicable Federal and State regulations.

Project compliance: No potentially significant impacts were identified (no mitigation is required) per the Biological Resources Technical Report, dated October 2023.

- **Open Space (TOT Code 18.46.050):** Sum of all areas listed in 18.46.010 and OS zoned portions of the property:

- 1. 100-year flood plains per 18.34
- 2. Environmentally sensitive areas per 18.46.030.B
 - a. Scenic vistas or prominent slopes, ridgelines, bluff lines or hillsides;
 - b. Deer migration routes and fawning areas and other wildlife movement corridors;
 - c. Habitat for State and Federally listed plant and animal species;
 - d. Large blocks of undeveloped forest lands and/or meadows;
 - e. Riparian habitat and corridors;
 - f. Wetlands per Section 18.46.040;
 - g. Unstable soils as identified in any required geotechnical study;
 - h. Avalanche areas
- 3. Lakes and ponds
- 4. Slopes in excess of 30%
- 5. OS zoned portions of the property

Project compliance: The Project has provided open space of approximately 39,651 SF which is greater than the open space requirement as calculated below.

2. The site is not in a 100-year flood plain (per the Flood Insurance Study for Nevada County, CA and Incorporated Areas) 0 SF;
 3. This site is not in any of the environmentally sensitive areas listed in 18.46.030.B (see KidZone Biological Study by WRA dated 10/10/2023 and KidZone Geotechnical Report by NV5 dated 3/29/2022 and supplemental letter dated 5/16/2022) 0 SF;
 4. The site does not have lakes or ponds 0 SF;
 5. The areas of the site with a slope greater than 30% +/-11,267 SF
 6. OS zoned portions of the property 0 SF
- **Parking (TOT Code 18.48.040, Table 3-8 and 18.48.090, Table 3-11):** Libraries and museums require 1 space per each 500 SF of gross floor area, plus 1 space per official vehicle. Cafés require 1 space per 75 SF of dining area, 300 SF of service area, and 100 SF of outdoor dining area. Compact car spaces may be provided for up to 25% of the total number of required spaces. Non-residential public community spaces include bicycle parking spaces provided at a rate of 25% of the number of vehicle parking spaces, with a minimum of 3 spaces.

Project Compliance: The Project requires = 20 museum parking spaces (9,770 SF / 500 SF) and 10 café parking spaces (438 SF dining / 75 SF + 292 SF service / 300 SF + 218 SF outdoor dining. Of these 30 spaces, 7 can be Compact Spaces (30 * 25%). The Project requires 8 bicycle parking spaces (30 * 25%). Project proposed to meet or exceed these requirements: 30 vehicle parking spaces (7 compact) and 8 bicycle parking spaces. See A1.0.1 for supporting calculations for vehicle parking. See LS1.0 for locations of 4 bike racks that can accommodate 2 bicycles each. Please note that a café is a planned future use and is not part of the current project.
 - **Accessory Retail Uses (TOT Code 18.58.030.C & 18.58.040.C):** Membership organizations, social or recreational establishments may engage in retail sales for guests only. The accessory use may not exceed 25% of the floor area devoted to the main use.

Project Compliance: The Project proposes to a 677 SF café for museum guests only. This square footage represents 6% of the total area of the museum. The interior of the café will not be built with the rest of the museum due to funding concerns.

DEVELOPMENT PERMIT FINDINGS

1. The proposed development is:
 - A. Allowed by Article II (Zoning Districts and Allowable Land Uses) within the applicable zoning district with the approval of a Development Permit and complies with all applicable provisions of the Truckee Development Code, Municipal Code, and Public Improvement and Engineering Standards.

Project compliance: The existing parcel has a zoning Public Facilities designation of PF and a Land Use designation of Recreation, Education & Public Assembly Uses which includes Libraries and Museums. A museum project is allowed under the current designation.
 - B. Consistent with the General Plan, any applicable Specific Plan and/or Master Plan, the Truckee Tahoe Airport Land Use Compatibility Plan, and the Particulate Matter Air Quality Management Plan.

i. Town of Truckee 2040 General Plan

a. Land Use Element

The Project is consistent with the General Plan's Land Use Guiding Principles because it preserves AND expands a well-loved and long-time community resource of a children's museum. It also relocates the KidZone Museum to a location in Truckee River Regional Park with recreational "density" and better access to alternative transportation. There is a TART bus stop just 700 feet from the Project and both the Legacy and Brockway Trails provide convenient and safe pedestrian and bicycle access.

b. Community Character Element

The Project reinforces Truckee's Community Character by strengthening "...the sense of community" and "...the diverse social fabric of the Truckee community." KidZone Museum was founded with the mission "to inspire learning through creative play and discovery" for children of all socioeconomic levels and has been operating in Truckee for more than 20 years. The current location, while small, provides creative components to facilitate the physical, cognitive, social, and emotional development of the children it serves. It also acts as a place for parents and caretakers to connect with others. The Project will expand the physical space of the museum so that it may house a broader variety of exhibits and activities that can serve to a wider age range of both local and visiting children.

c. Housing Element

For over two decades, the KidZone philosophy has been to support families and people in the Truckee community. This includes the museum staff. It is KidZone's practice to only hire additional staff when the budget allows the offered wage to meet the market wage. This is one of the reasons that the number of added FTEs for the new museum is lower than what the Development Code estimates for this size project. Please see the included memo regarding the Workforce Housing Requirement and FTEE calculation.

d. Economic Development Element

The Project is consistent with the Economic Development Element of the General Plan because it provides a year-round destination for children's learning activities for both residents and visitors.

e. Conservation and Open Space Element

The Project is consistent with the Conservation and Open Space Element of the General Plan because the existing museum, which is a current part of Truckee's existing "...diverse range of recreational opportunities...", is expanded and relocated to a more accessible location in Truckee River Regional Park.

The Project's design intent is a "low impact development" that will "...reduce the environmental impact..." of the development. The Project will protect biological resources by applying recommended mitigation measures recommended in the Biological Resources Technical Report. The Project will also incorporate design best practices, such as solar orientation and passive

heating/cooling, to reduce the use of gas and electricity for temperature control and lighting. These best practices will provide learning opportunities for children that visit the museum but also reduce the non-profit museum's operating costs.

Additionally, the final design and construction of the projects will be required to follow the Particulate Matter Air Quality Management Plan adopted by the Town in 1999.

f. Safety and Noise Element

The Project is consistent with the Safety and Noise Element of the of the General Plan because:

- 1) It is located outside the VHFHSZ and has a lower wildfire danger than other locations in Truckee but will be designed to meet current standards for fire suppression and resistance per California WUI standards;
- 2) It is located outside FEMA 100- and 500-year flood zones or DWR Awareness Flood Zones;
- 3) It will be designed to meet current standards for seismic resistance;
- 4) The site is within Compatibility Zones C and D, as determined by the Truckee Tahoe Airport Land Use Compatibility plan. Nevada County Transportation Commission has reviewed and verified that a children's museum is an allowed use in both of these zones. The Project will comply with the more stringent requirements of Zone C including maximum density of 75 ppl/acre and max. single-acre occupancy of 225 ppl, total building height of less than 35 feet. KidZone will execute the required overflight easement.
- 5) Refer to the Project's Noise Technical Study dated April 14, 2023 included with this submittal. The Project is not anticipated to result in a substantial increase in noise over the existing conditions once it is operational. During construction, the Project will institute noise reduction measures as recommended by the Study.

ii. Truckee River Regional Park Master Plan 2020 – 2030

The Project site is the location recommended by the Regional Park Master Plan and will revitalize the existing maintenance and storage area. The recommended road improvement to connect the existing school site to the KidZone Museum is not feasible due to Town of Truckee Engineering requirement that a new road create a 4-way intersection with Nicolas Drive.

iii. Truckee Trails & Bikeways Master Plan 2015

This master plan is not applicable to the Project.

iv. Truckee Tahoe Airport Land Use Compatibility Plan

The site is within Compatibility Zones C and D, as determined by the Truckee Tahoe Airport Land Use Compatibility plan. Nevada County Transportation Commission has reviewed and verified that a children's museum is not a prohibited use in either of these zones. The Project will comply with the more stringent requirements of Zone C including maximum density of 75 ppl/acre and max. single-acre

occupancy of 225 ppl, total building height of less than 35 feet. KidZone will execute the required overflight easement.

v. Particulate Air Quality Management Plan

The Project consistent with the Particulate Air Quality Management Plan because it does not include solid fuel burning devices.

2. The proposed development is consistent with the design guidelines, achieves the overall design objectives of the design guidelines, and would not impair the design and architectural integrity and character of the surrounding neighborhood.

Project compliance:

A. General Design Guidelines

i. Community Design Principles

The Project reinforces Truckee's sense of place in several ways. The Project more than doubles the area of the existing museum that serves all children of the Truckee community, visitors, and working-class families alike. The design is straight forward and functional, yet uniquely designed for the site. The building and site design embrace and protect the natural environment by providing contiguous open space, with orientation to sun and views, and providing an attractive outdoor activity and learning areas for the museum visitors. Additionally, the location of the Project, which is accessible via the Legacy and Brockway Trails and is walking distance from an existing transit stop and other recreational resources, is consistent with sustainable design objectives.

ii. Community Design Objectives

The Project reflects Truckee's community design goals by utilizing a simple, modern form with honest structure that does not take away from the natural environment in which it sits. The simple form places the emphasis of the site not on the building itself but on the natural beauty around it and the landscaping included within the Project. It lies on the east / west axis line for optimal solar gain and shading as well as opening the view corridor from the interior of the building out to the north, while allowing maximum daylight to come in from the south. A roof articulation along with exterior slats break up the façade to clearly direct one to the entrance corner of the building. Vertical stretches of differing materials and windows reflect the vertical "barcode" created by the trunks of trees as one walks through the forest which surrounds the site.

iii. General Building Design Guidelines

The architectural design builds upon the contemporary mountain style that is becoming part of Truckee's heritage. The Project utilizes a pre-engineered metal building that is situated to maximize open space and solar efficiency.

B. Building Characteristic Design Guidelines

The architecture of the Project balances utility with site responsiveness and suitable architectural expression. It does this through form, material, color, pattern, and detail.

Materials and colors were chosen to reinforce the volume and add articulation to the basic shape of the building, provide durability, and blend with the surrounding landscape. Insulated, vertical-rib, metal siding was chosen for durability, fire resistance, and affordability. To provide visual interest, the Project utilizes horizontal shading elements and multiple earth-toned colors. The color scheme of was chosen to sit comfortably in the surrounding landscape while also providing a unique fun to reflect the program taking place inside its walls.

The roof is a shed roof of a single slope. The location of the building, slope of the roof, roof overhang, and roof material, standing seam metal, combine to allow snow to safely shed away from doors and occupied outdoor museum areas.

The Project entry is defined by an extended roof overhang and horizontal shading elements. This shade structure is also the location of the signage and photovoltaic panels.

Windows are designed and combined to create rhythm, repetition, and pleasing proportions in the building, as well as to connect indoors and outdoors. In areas where more light and connection are desired, windows are grouped in patterns to reflect the surrounding forest.

C. Site Design Guidelines

i. General Site Design Guidelines

The Project considers adjacent development in the following ways:

Surrounding properties include Truckee River Regional Park to the north and west, multi-family townhouses to the east and McIver Rodeo Arena to the south. The architectural styles of the adjacent townhomes are extended gable form buildings with additive gable roof forms at entries. Colors include tans and grays.

The Project responds to its natural surroundings by maintaining contiguous open space and preserving as much of the existing natural features and mature trees as possible. Additionally, the Project embraces the sun by placing outdoor recreation spaces to the south of the building and parking to the east of the building. The primary views of the mountains are to Donner Peak to the west and Mt. Rose to the east. The Project does not block these views for pedestrians or neighboring developments.

The location of the Project is connected to Truckee River Regional Park via existing bike and pedestrian paths as well as existing sidewalks on River View Drive.

ii. Define the Public Realm

The Project will create a comfortable pedestrian environment by providing open paved areas leading to the building entry situated at the southeast corner nearest the street. These open paved circulation areas will also connect with the existing sidewalk on River View Drive.

iii. Building Orientation

The building was oriented on the site for solar orientation and to work within the locations of existing slopes unsubstantiated fill on the site. The east-west axis of the south-facing building utilizes solar gains at the Museum's outdoor learning and exhibit space and to provide visual connection between this

exterior space and the main interior exhibit floor. These goals caused an orientation that is perpendicular to the street. The Museum entry is designed prominently at the building corner that faces the street to draw interest. After orienting the building, the only remaining place available for parking is located between the street and the building.

iv. Protection of Views and Natural Features

The Project embraces the sun by placing outdoor recreation spaces and parking to the south and east of the building. The building height is lower than many of the existing mature trees on the site and will not provide an additional visual barrier to views of surrounding mountain peaks.

v. Snow Storage Areas

Snow storage is provided at the end of the fire lane near the northwest corner of the building and at the north end of the parking lot.

vi. Parking Location

The parking is a straightforward and efficient layout that provides direct access to the building. The parking will receive abundant sun during the winter months. Deciduous trees along the eastern and western edges and in landscaping strips will provide shade in the summer months. The driveway entrance is located equidistantly between both the intersections of River View Drive with Nicolas Drive, as per preliminary coordination with the Town Engineering department.

vii. Street Character

The current state of the site includes a worn-down wood and chain-link fences which hold a series of shipping containers, trailers, and other eye sore objects to the south of the property. On the center portion where the building and parking will sit, is currently habited by a blank dirt “yard” or parking area with no definition and is littered with gravel and some remains of logged trees. Along the Riverview Street frontage there is an existing power line easement through the Project site, which separated the proposed improvements from the public ROW and prohibits any landscaping in that area. Though the building is sited away from the street frontage and oriented perpendicular to the street, the Project will create street character with landscaping and views to the Museum’s outdoor areas, revitalizing the currently non-existent street frontage with a pedestrian friendly and welcoming experience.

D. Sustainability Design Guidelines

i. Sustainability Objectives

The Project supports goals to meet environmental sustainability with a design that meets the California Green Building Code as well as explores other avenues and opportunities beyond the code in order to create a sustainable and healthy building for children to play and learn. Within the building itself and around the grounds, several exhibits both permanent and temporary will act as learning opportunities to teach the next generation on how to become stewards of the environment and celebrate the greater Sierra Nevada ecosystem. Additionally, the Project is located on an existing street, thereby reducing new infrastructure. Also, the Project is within walking distance of many amenities and encourages alternatives to motorized transportation.

ii. Solar Exposure and Orientation

Buildings, entries, outdoor spaces, and parking are placed and oriented to receive sun during the winter months. Solar panels are also located on the south façade of the building.

E. Landscaping and Hardscaping Design Guidelines

The proposed landscape conforms to the Town of Truckee Design Guidelines and is in keeping with the Efficient Water Saving Standards for both the Town and State of California. We have proposed street trees, that create a buffer planting along the rear side of the building and parking lot plantings to help with screening as well as reduce reflective heat off the pavement. Because the rear parking lot is so far below, tree planting is provided along the north side of the building along the walkway.

In addition to the landscaping around the site, our design also features outdoor learning areas, seating benches, bike racks, and planters.

We have provided enclosed landscaping around the southwest and west sides of the building for our outdoor exhibit and learning area. This area will feature climbing structures, benches throughout, planter areas, playhouses, and storage areas. This area also incorporates stormwater management bio-basin's.

For calculations on required landscape and our proposed planting improvements, please refer to sheet LP4.2 of the landscape plans. For Worksheet A and the efficient water use irrigation zones, refer to sheet LP4.2.

F. Service and Utility Placement Design Guidelines

Trash and recycling facilities are integrated into the site design, with receptacles at the southeast corner of the property in an enclosure.

G. Fence and Wall Design Guidelines

The Project incorporates a fence around the outdoor activity areas in the southwestern and west portion of the site. The fence provides security for children utilizing these areas. The design of the fence is visibly unobtrusive and provides safety for children.

3. The Development Permit approval complies the requirements of the California Environmental Quality Act (CEQA) and there would be no potential significant adverse effects upon environmental quality and natural resources that could not be properly mitigated and monitored, unless a Statement of Overriding Considerations is adopted.

Project Compliance: The overall Project is being submitted for CEQA review and approval concurrently with the Town's Entitlements review process. At this time, a Mitigated Negative Declaration is expected for the Project along with all required Entitlements and, therefore, the Development permit approval is expected to comply with the CEQA requirements.

4. There are adequate provisions for public and emergency vehicle access, sanitation, water and public utilities and services to ensure that the proposed development would not be detrimental to public health and safety. Adequate provisions shall mean that distribution and collection facilities and other infrastructure are installed at

the time of development and in operation prior to occupancy of buildings and the land and all development fees have been paid prior to occupancy of buildings and the land;

Project Compliance: All required fees will be paid by KidZone prior to final project occupancy. The proposed access drive, fire lane, parking and sidewalks meet the Town requirements for geometric dimensions and layout meeting the required emergency vehicle access. Furthermore, the Project also includes adequate utilities, including solid waste collection services.

5. The subject site is:

A. Physically suitable for the type and density/intensity of development being proposed;

Project Compliance: As shown by the included preliminary plans, the proposed designs fit well within the parcels and interacts well with the public right of way and traffic flow.

B. Adequate in size and shape to accommodate the use and all fences and walls, landscaping, loading, parking, yards and other features required by this Development Code;

Project Compliance: As shown by the included preliminary civil plans, there is adequate size and shape for the proposed parking lot. The proposed Project site meets or exceeds the requirements of the development code, unless otherwise noted in this document.

C. Served by streets adequate in width and pavement type to carry the quantity and type of traffic generated by the proposed development.

Project Compliance: The Project is served by River View Drive, which is adequate for proposed traffic volumes. Additional information will be provided by the Traffic Study to be obtained by the Town of Truckee.

6. The proposed development is consistent with all applicable regulations of the Nevada County Environmental Health Department and the Truckee Fire Protection District for the transport, use and disposal of hazardous materials.

Project Compliance: Hazardous materials shall be limited on the proposed Project. The Project will adhere to the regulations of the Nevada County EHD and the Truckee FPD. The Project contractor(s) will be held to these same regulations during construction.

December 11, 2024

Town of Truckee
Attn: Lucas Kannall
10183 Truckee Airport Road
Truckee, CA 96161

Subject: Letter of Justification for Project Phasing for the KidZone Museum Project – APN: 019-450-035

Dear Lucas,

The proposed KidZone Museum Project has recently decided to pursue a phased approach to the 10,500 SF facility submitted on 12/13/2023. KidZone proposes the following phases:

1. Phase 1 – Construct the eastern 6,500 SF of the building. The building interior will be redesigned with smaller interior exhibit and learning spaces to fit within the smaller footprint. The building exterior remains almost identical excepting that the north and south elevations are now shortened, and the west wall moves to the east to fully enclose the smaller building. The footprint of Phase 2 will be soft scaped for use as exterior learning and play. Additionally, Phase 1 of the outdoor play area has been reduced from 18,000 SF to 9,000 SF of landscaped area (including the footprint of Phase 2). At the end of Phase 1, the museum will be a completed building and site with no indication that an additional phase is planned. This Phase will be completed in fall of 2026.
2. Phase 2 – Design and construct a 4,000 SF addition to the completed museum in the landscaped area designated for Phase 2. Expand the outdoor play area to 18,000 SF. Construction for this phase is expected to begin during the summer of 2028 and be completed in approximately 1 year.

DEVELOPMENT PHASING STANDARDS

- **Phasing (TOT Code 18.84.050):** Approval for phasing requires approval for the final development plan. Land use or entitlement approvals for the first and subsequent phases expire if the first phase construction is not started within 2 years of approval and constructed within 4 years of approval (or 6 years with approved extension). Land use or entitlement approvals will expire if subsequent phases do not start within 2 years of completion of the previous phase to avoid expiration

Project compliance: We expect land use and entitlement approval in January 2025. Phase 1 construction will begin with 6 months of this date (May 2025) and complete within 2 years of this date (August 2026). Phase 2 will begin construction within 2 years of Phase 1 completion (Summer 2028) or earlier and will be completed by the end of 2029.