

**PLANNING COMMISSION RESOLUTION 2023-10
A RESOLUTION OF THE TOWN OF TRUCKEE PLANNING COMMISSION
APPROVING APPLICATION 2022-00000071/DP-MUP-SP AND ADOPTING A MITIGATED
NEGATIVE DECLARATION AND ASSOCIATED MITIGATION MONITORING AND
REPORTING PROGRAM
(TAHOE DONNER DOWNHILL SKI LODGE REPLACEMENT)**

EXHIBIT "B"

**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
WITH MITIGATION MONITORING AND REPORTING PROGRAM AND
RESPONSES TO COMMENT**

Initial Study/Mitigated Negative Declaration

Tahoe Donner Downhill Ski Lodge

MAY 2023

Prepared for:

TOWN OF TRUCKEE

Planning Division
10183 Truckee Airport Road
Truckee, CA 96161
Contact: Yumie Dahn

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
BTU	British thermal unit
CEQA	California Environmental Quality Act
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
GHG	Greenhouse Gas
IS	Initial Study
LRWQCB	Lahontan Regional Water Quality Control Board
MND	Mitigated Negative Declaration
NCDEH	Nevada County Department of Environmental Health
NSAQMD	Northern Sierra Air Quality Management District
PRC	Public Resources Code
SF	Square feet
TMC	Truckee Municipal Code

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1 Introduction

1.1 Project Overview

The proposed project is the demolition of the existing ski lodge at the Tahoe Donner Ski Area and construction of a new ski lodge in its place. The proposed uses remain unchanged from existing ski lodge uses. The replacement lodge will serve as a ski lodge facility for guests at the Tahoe Donner Downhill Ski Resort and provide improved facilities and services.

1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) applies to projects carried out, funded or approved by state or local government agencies. The proposed project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). State CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, the Town of Truckee (Town) is the lead agency responsible for compliance with CEQA for the proposed project.

CEQA Guidelines Section 15183 provides that a project which is consistent with the development density established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies. If the lead agency determines that the prior EIR, or uniformly applied development policies, would address all potential project impacts, a new CEQA document is not required. If the potentially significant impacts that are peculiar to the project or the project site, were not adequately analyzed in the prior EIR (including off-site and cumulative impacts), or may be more severe as a result of new information which was not known at the time of the prior EIR, a CEQA document would be prepared to address those particular impacts. The 2025 General Plan and EIR can be found at the following link:

<https://www.townoftruckee.com/government/community-development/planning-division/plans-and-regulations/2025-general-plan>

This Town of Truckee prepared this Initial Study (IS) to consider the proposed project in light of the Town of Truckee 2025 General Plan EIR. The project is consistent with the land use classification, intensity (which is how non-commercial development “density” is typically described), zoning, and relevant policies. The project complies with all development standards in the Truckee Municipal Code. The IS found that certain project and site-specific conditions may in potentially significant impacts that were not adequately addressed in the 2025 General Plan EIR nor addressed by uniformly applied development policies. However, the IS further finds that these impacts would clearly be reduced to less than significant with implementation of feasible mitigation measures. Therefore, a proposed Mitigated Negative Declaration (MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) CEQA Guidelines Section 15070 which states that an MND can be prepared when “(a) the initial study shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or (b) the initial study identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant, before

a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.”

Those environmental topics that have been adequately addressed by the Town of Truckee 2025 General Plan Environmental Impact Report (EIR) and/or would be substantially mitigated by uniformly applied development policies or standards adopted by the Town are discussed in the IS.

1.3 Public Review Process

The proposed IS/MND shall be circulated for a public review period of at least 30 days. The review period is identified in the Notice of Intent (NOI) for the project. The NOI includes where to submit written or electronic comments on the proposed IS/MND.

In reviewing the IS/MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment, as well as the ways in which the significant effects of the project are proposed to be avoided or mitigated.

Following the public review period, prior to taking action on the proposed project, the Town shall consider the proposed IS/MND together with any comments received during the public review process. The Town shall adopt the proposed IS/MND if it finds on the basis of the whole record before it that there is no substantial evidence that the project will have a significant effect on the environment and that the IS/MND reflects the Town’s independent judgment and analysis.

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2 Summary of Findings

The discussion provided in Section 3 of this IS found that there would be potentially significant project-specific impacts related to air quality, biological resources, and hydrology/water quality. For other environmental topics, the proposed project is consistent with the 2025 General Plan, for which an EIR was prepared. The potential impacts of the project area are adequately addressed by the General Plan EIR or uniformly applied development policies or standards adopted by the Town.

2.1 Mitigation Measures

The following mitigation measures apply to the proposed project:

MM-AQ-1 **Dust Control Plan.** The project applicant shall prepare a Dust Control Plan pursuant to NSAQMD Rule 226 (Dust Control) and Title 18 of the TMC (Section 18.30.030 – Air Emissions). The Dust Control Plan must be submitted to and approved by the Air Pollution Control Officer before topsoil is disturbed. The Air Pollution Control Officer may require use of palliatives, reseeding, or other means to minimize windblown dust. After commencement of development, if the approved elements of the dust control plan prove ineffective, the Air Pollution Control Officer may require additional control measures to be instituted.

MM-AQ-2 **Criteria Air Pollutants.** The project applicant shall implement the following measures in order to mitigate criteria air pollutants exceeding the NSAQMD level A and level B thresholds during project construction:

Level A.

- a. Alternatives to open burning of vegetative material will be used unless otherwise deemed infeasible by the District. Among suitable alternatives are chipping, mulching, or conversion to biomass fuel.
- b. Grid power shall be used (as opposed to diesel generators) for job site power needs where feasible during construction.

Level B.

- c. Controls specified above (a and b) shall be implemented.
- d. Temporary traffic control shall be provided during all phases of the construction to improve traffic flow as deemed appropriate by local transportation agencies and/or Caltrans.
- e. Construction activities shall be scheduled to direct traffic flow to off-peak hours as much as practicable.

MM-AQ-3 **Asbestos.** If naturally occurring asbestos (NOA) is identified during earthwork, the NSAQMD must be notified no later than the following business day and compliance with the statewide *Asbestos Toxic Control Measure for Construction, Grading, Quarrying and Surface Mining Operations*

(Asbestos ATCM) would be required. In regard to surfacing materials, the project is required to comply with the statewide *Asbestos Airborne Toxic Control Measure for Surfacing Applications* (Surfacing ATCM), which prohibits the use of material containing 0.25% asbestos or greater for surfacing of areas such as pedestrian walkways and pavement.

MM-BIO-1 **Protection of Active Bird Nests.** If ground disturbance activities take place during the breeding/nesting season (March through August), a preconstruction bird nest survey is required and shall be conducted by a qualified biologist no more than 15 days prior to initiation of proposed construction activities. If no active nests are identified during the preconstruction survey, no further actions or restrictions are required. If active nests are found on or immediately adjacent to the site, a nest avoidance plan shall be prepared and implemented with approval from the Town of Truckee and if the Town requests, CDFW. The avoidance plan shall identify appropriate nest buffer zones within which project activities will be precluded to ensure no harm or agitation of nesting birds occurs and a qualified biologist shall monitor the nest(s) and project activities to ensure the buffer zones are adhered to until the nesting birds have fledged. Once the nesting birds have fledged from active nests, there is no longer a need for a nest avoidance plan or to enforce any related nest buffer zones, and project activities could then proceed without any bird nest-related restrictions.

MM-HYD-1 **Dewatering Plan.** Prior to issuance of a building permit, a California licensed Geotechnical Engineer or Engineering Geologist shall prepare and submit a draft Dewatering Contingency Plan for any dewatering activities that may be required during construction activities. The Dewatering Contingency Plan shall prioritize gravity flow techniques prior to use of pumping techniques and include best management practices (BMPs) for the management of any discharge water. The required BMPs shall be consistent with the California Stormwater Quality Association Construction BMP Handbook for Dewatering Activities and include appropriate BMPs such as sediment basins or holding tanks, energy dissipators, and/or sediment traps. No ground disturbance activity shall occur prior to approval of the final Dewatering Contingency Plan by the Town of Truckee and Lahontan Regional Water Quality Control Board.

3 Initial Study Checklist

1. Project title:

Tahoe Donner Downhill Ski Lodge

2. Lead agency name and address:

Town of Truckee
10183 Truckee Airport Road
Truckee, CA 96161

3. Contact person and phone number:

Yumie Dahn, AICP
Senior Planner
530.582.2918

4. Project location:

11603 Snowpeak Way
Truckee, CA 96161

Assessor's Parcel Number (APN) 046-250-005, 007, 009

5. Project sponsor's name and address:

Tahoe Donner Association
11509 Northwoods Blvd.
Truckee, CA 96161

6. General plan designation:

The project site is within the *Tahoe Donner Plan Area*.

7. Zoning:

The project site is zoned *Recreation (REC)*.

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The project is located in the Town of Truckee, at 11603 Snowpeak Way (see Figure 1, Project Location). The project site includes the existing ski lodge and adjacent grounds (see Figure 2, Project Site). The proposed project is the demolition of the existing ski lodge at the Tahoe Donner Ski Area and construction of a new ski lodge in its place. No changes to the uses, operations, and parking areas are proposed to the

existing ski hill. The proposed project is consistent with the development standards of the REC (Recreation District) of the TMC and the Tahoe Donner Plan Area General Plan land use designation. The downhill ski lodge is a homeowners association amenity that primarily serves the members of the Tahoe Donner subdivision. The replacement lodge will serve as a ski lodge facility for guests at the Tahoe Donner Downhill Ski Resort and provide improved facilities and services for the existing demand. The primary services and amenities provided at the ski lodge are broken down into three categories:

- Guest services. Guest services consist of ticket sales, public lockers, equipment rental and repair, guest services, ski school and children's programs.
- Commercial facilities. Commercial facilities consist of food and beverage seating, a kitchen, a bar and lounge, restrooms and accessory retail.
- Operational facilities. Operational facilities include administration, employee facilities and first aid and mountain patrol.

Existing operations at the ski area would not change. Current winter and summer activities at the ski lodge and resort are as follows:

- Winter (November through April). Operates daily 8:00 a.m. to 5:00 p.m.
 - Services include equipment rental, retail sales, ski school, ticket sales, shuttle service, bar and food and beverage.
 - Community ski-related events happen throughout the season that occur during normal operating hours of the downhill ski resort.
 - Two annual community ski-related events which might fall out of normal operating hours:
 - New Year's Eve celebration, 5:00 PM to 8:00 PM – Light parade and fireworks show (5:00 PM to 8:30 PM)
 - The Saturday of the President's Day Holiday Weekend, 5:00 PM to 7:30 PM – Glow parade on Snowbird Lift
 - T). Other private or community events are prohibited.
 - Approximately three event dinners and ceremonies for ski-related clubs that are wholly indoors and end by 10:00 PM. No other restaurant activities occur outside the normal operating hours.
 - Ski operations include chair lifts, conveyor lifts, snowmaking, snow removal and grooming operations (which occur throughout the day and night).
 - Administrative (office) activities occur throughout the winter.
- Summer (May through October).
 - Day camps operate daily 9:00 a.m. to 4:00 p.m.
 - Administrative (office) activities occur throughout the summer.
 - Maintenance of buildings, ski lifts, equipment, and trails occurs throughout the summer.

The existing ski lodge at the Tahoe Donner Ski Area is approximately 15,128 square feet (SF), with an adjoining outdoor deck area that is 5,056 SF (see Figure 3, Existing Site Plan). The highest site elevation is 6,784 feet. The site slopes to the northeast at approximately an 8% grade. The lodge is accessible from Slalom Way and a driveway to the west of the lodge that connects to Snowpeak Way. Existing parking

includes 219 parking spaces among five parking lots located off Slalom Way and Snowpeak Way (APNs 046-050-002, 046-050-001, and 046-040-002) that are served by shuttles run by Tahoe Donner Association. 85 additional parking spaces are permitted in the Town right-of-way, on the north side of the Snowpeak Way, 525 feet west and 900 feet east of the intersection of Snowpeak Way and Slalom Way (see Figure 4, Parking and Circulation), and the north side of Slalom Way, 950 feet north of the intersection of Snowpeak Way and Slalom Way, per a Seasonal Parking Permit Agreement (executed on October 16, 2008, allowed per Town of Truckee Municipal Code Section 10.17.035. Per this agreement, no parking is permitted within a ten-foot setback on either side of a residential driveway.

The existing downhill ski lodge has between 45-107 employees depending on mid-week, weekend, or holiday staffing needs. During peak ski periods such as Christmas and New Year’s week, Martin Luther King Jr. holidays weekend, and President’s Day weekend, employees park at the Tahoe Donner Lodge, located at 12850 Northwoods Boulevard. Shuttle service for employees is provided from Tahoe Donner Lodge to the Downhill Ski Lodge based on historical skier visitation tracking data from the past 20 years, approximately 10 to 15 days/year. The shuttle runs every 15 minutes from 7:00 AM to 9:15 AM and 3:00 PM to 5:15 PM. There are no additional parking or shuttle service for guests outside of the approved five parking lots and on-street parking lots. Based on Table 1 below, while some departments will increase or decrease in employee numbers, the existing staffing levels will in total remain the same with the new downhill ski lodge.

Table 1. Proposed Project Staffing Levels

Department	Existing Number of Staff			Proposed Number of Staff		
	Mid-Week	Weekends	Holidays	Mid-Week	Weekends	Holidays
Food and Beverage	5	7	8	5	7	8
Rentals and Retail	3	8	10	3	8	10
Lift Operations	9	9	9	9	9	9
Tickets and Guest Services	2	5	6	2	5	6
Parking	2	4	4	2	4	4
Transportation	1	2	2	1	2	2
Management	3	3	3	3	3	3
Ski School	12	35	55	12	35	55
Ski Patrol	3	4	4	3	4	4
Mechanic	2	2	2	2	2	2
Grooming – Grave and Swing Shifts	2	3	3	2	3	3
Custodian - Swing Shift	1	1	1	1	1	1
Total	45	83	107	45	83	107

Source: Tahoe Donner Ski Area Resort Manager.

The proposed ski lodge building is a three-story building with a gross area of 24,490 SF (see Figure 5, Proposed Site Plan). The first floor is 4,265 SF, and includes staff support and kitchen prep space, storage, utility space, and restrooms. The second floor is 10,125 SF and includes rentals and guest services, the ski school, offices, storage, and restrooms. The third floor is 10,100 SF and includes dining and kitchen area, storage, and restrooms. The top two stories are visible from Slalom Way (see Figure 6, Proposed

Elevation), while all three stories are visible from the driveway that connects to Snowpeak Way (see Figure 7, Proposed Elevation Northeast).

The total building lot coverage (footprint) is 11,038 SF. The deck and covered entryway (on the north side) add an additional 7,794 SF of lot coverage. The total size of the proposed parcel (pending a lot line adjustment) is approximately 3 acres. The area of project disturbance is approximately 1.3 acres. No new improvements or expansion to the existing parking areas are proposed. No expansion or enhancement of the ski hill, runs, lifts, or operations are part of this project.

As measured from the average surrounding grade to the top of the building, the building height would not exceed 35 feet (the height limit per the zoning standards). A new deck will connect to the third floor on the south side, at the same grade as the existing ski lift.

A circular shuttle drop-off area will be incorporated into the project on Slalom Way. The project will also include new landscaping. The site contains one mature tree which will be retained. The landscaping is located within the shuttle drop-off area and on the east side between the lodge driveway and the adjacent parcel. The plant palette includes Jeffrey pine, shrubs, and groundcover, which will be irrigated with a low flow drip system.

The proposed project would require the approval of a Development Permit for a new structure that is proposed to contain 7,500 SF or more of total gross floor area and 26,000 SF or more of disturbance and a Minor Use Permit for disturbance of land or located within 200 feet of any wetland area. Land use entitlements are effective for two years from the approval with construction required to be completed within four years of the approval date unless a Time Extension is approved per Section 18.84.055 of the Truckee Municipal Code.

Construction is proposed to begin in spring (rough grading) and conclude in fall of the following year. While construction is ongoing through the winter ski season, temporary portable buildings would be placed in Parking Lot 5, at the corner of Slalom and Snowpeak Way. During construction season (summer), Parking Lot 5 would be used as a staging area.

9. Surrounding land uses and setting: Briefly describe the project’s surroundings:

Location	Zoning	General Plan Classification	Existing Land Use
North APN: 046-250-013	Residential Multi-Family (RM-15)	Tahoe Donner Plan Area	Tahoe Donner Association Clubhouse/Swimming Pool
South APN: 046-250-007 (0.01 ac. TDA parcel) APN: 046-250-005	Recreation (REC)	Tahoe Donner Plan Area	Tahoe Donner Ski Resort
East APNs: 046-250-013 & 046-250-014	Residential Multi-Family (RM-15)	Tahoe Donner Plan Area	Tahoe Donner Condominiums
West APNs: 046-250-013, 046-250-012 & 046-570-023	Residential Multi-Family (RM-15)	Tahoe Donner Plan Area	Tahoe Donner Condominiums

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

- Development Agreement from the Tahoe Donner Public Utilities District for electrical service.
- Dewatering permit and approval of a Stormwater Pollution Prevention Plan (SWPPP) by the Regional Water Quality Control Board (RWQCB).
- Truckee Sanitary District
- Permit from the Nevada County Department of Environmental Health (NCDEH) for the food service facility.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Town staff sent out consultation notifications to the tribes listed on the Native American Heritage Commission Tribal Consultation list, which included the Tsi Akim Maidu, United Auburn Indian Community of the Auburn Rancheria, Washoe Tribe of Nevada and California, Wilton Rancheria, Colfax-Todds Valley Consolidated Tribe, and Nevada City Rancheria Nisenan Tribe. The United Auburn Indian Community of the Auburn Rancheria (UAIC) deferred consultation to the Washoe Tribe but requested updates if no other tribes actively engage on the consultation. Staff specifically reached out to the Washoe Tribe of Nevada and California a second time and asked if consultation will be requested. No response was received. Staff reached out to UAIC and informed them that no other tribe, including the Washoe Tribe, requested consultation. No response was received and on February 15, 2023 formal consultation was closed.

Environmental Factors Potentially Affected

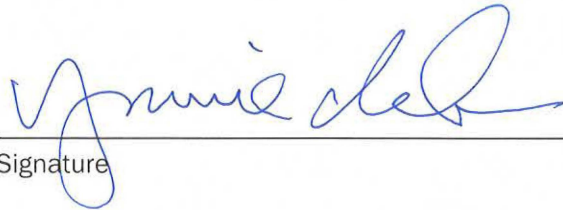
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

05/19/2023

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project have a substantial adverse effect on a scenic vista?*

The 2025 General Plan states that scenic vistas in Truckee include those of high mountain ridges and peaks, expansive open space, and specific natural features such as the Truckee River or Donner Lake (Town of Truckee 2006a). Therefore, projects that would detract from these scenic views may be considered to have a substantial adverse effect on a scenic vista. However, the 2025 General Plan EIR determines that goals, policies, and actions in the General Plan intended to preserve these scenic vistas would result in a less than significant impact to scenic vistas (Town of Truckee 2006b). These include Goal LU-1, which seeks to maintain the Town’s mountain community character, and Goals CC-1 and CC-2, both of which specifically call for preservation of Truckee’s scenic open space and other visual resources. Policies under Goal CC-2 identify preservation of scenic views of hillsides and ridgelines, protection of the Truckee River and other natural waterways, safeguarding the scenic values of Donner Lake, and more specific strategies such as implementation of landscaping to improve views. The General Plan EIR

determined that compliance with these General Plan goals and policies would result in a less-than-significant impact on scenic vistas.

The proposed project would involve demolition of an existing ski lodge and construction of a new ski lodge in its place. While the adjacent ski hill is located on a designated Prominent Slope, Ridge Line, Bluff Line or Hillside of Figure CC-1 (Scenic Resources) of the Community Character Element of the General Plan, the project site is not located in an identified Scenic Resource. The proposed ski lodge building is a three-story building with a gross area of 24,490 SF and would not exceed 35 feet as measured from the average surrounding grade to the top of the building. While the new ski lodge would be larger in size and stature, the project would comply with the height limit (35 feet) and maximum site coverage (40%) specified in Truckee Municipal Code (TMC) Section 18.16.040 for the REC zoning district. The new ski lodge is designed with two full stories plus a half semi-basement level, blending in with the hillside. The design of the new ski lodge is in context with its surroundings, which would minimize disturbance to scenic views and vistas, consistent with the General Plan goals and policies. For example, the new ski lodge would incorporate exterior board siding in natural colors with exposed concrete wainscot. The proposed project would comply with the TMC and General Plan policies, would blend into the mountain terrain, and would not contain any elements that would detract from scenic views or vistas; therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The General Plan EIR determined that buildout of the General Plan would have a less-than-significant impact on state scenic highways as there are no officially designated scenic highways that run through Truckee. The General Plan identifies portions of Interstate 80 and Highway 89 North as scenic corridors. The project is located outside of the designated scenic corridor areas and is not visible from these areas. Therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

c) *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The General Plan EIR determined that General Plan goals and policies that seek to encourage high quality design and to achieve a balance between new development and preserving scenic resources would ensure impacts to visual character and quality of public views would be less than significant. For example, Community Character Element Policy P5.1 would require that all planning and development decisions respect the character and context of existing development, the landscape, and the natural environment. Policy P5.2 would require all new development to “incorporate high quality site design, architecture, and planning so as to enhance the overall quality of the built environment in Truckee and the Town’s unique character, and create a visually-interesting and aesthetically-pleasing town environment.” Compliance with the General Plan would therefore result in less-than-significant impacts.

The project site is not located within an urbanized area as defined by Public Resources Code (PRC) Section 21071. As previously discussed, the proposed project would be consistent with the current visual character

of the area. The new ski lodge is designed to blend in with the mountainous terrain and to respect the surrounding natural environment, consistent with the General Plan policies P5.1 and P5.2. Exterior board siding in natural colors, exposed concrete wainscoting, and stone cladding would be consistent with the visual character of the area. The proposed project would comply with the TMC and General Plan policies, would blend into the mountain terrain, and would not contain any elements that adversely impact visual character of quality of public views; therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The General Plan EIR states that Truckee is threatened not only by light pollution from development within the Town's own borders, but also from sky glow associated with intensive development of the Reno/Sparks metropolitan area. However, Goal CC-4 in the Community Character Element of the General Plan includes policies and actions to protect views of the night sky and minimize the effects of light pollution. Policies P4.2 and P4.3 require light fixtures to be designed and sited to minimize light pollution, glare, and light trespass into adjoining properties. These policies also encourage the removal, replacement or retrofit of light fixtures that contribute to light pollution. The General Plan EIR determined that compliance with General Plan goals and policies would result in less-than-significant impacts regarding light and glare.

The project site is currently developed with an existing ski lodge that would be replaced by the proposed project. There are existing sources of light and glare created by car headlights, interior and exterior lighting from buildings, and parking lot lighting. The proposed project is not anticipated to substantially increase light and glare from existing conditions. New and replacement exterior lighting would be low-level, shielded fixtures conforming to guidelines in TMC Section 18.30.060. A site photometric study for the project site also shows that there would be no light trespass beyond the project site's property line (Bull Stockwell Allen 2022). Therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<p>II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

The General Plan EIR did not address agricultural and forestry resources. According to the California Department of Conservation, the project site has not been mapped by the Farmland Mapping and Monitoring Program (FMMP) (DOC 2020). The project site is currently used as a ski lodge and the proposed project would not change the uses at the site. No agricultural uses exist at the site and therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

- b) ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

The General Plan EIR did not address agricultural and forestry resources. The proposed project is not zoned for agricultural use and there is no Williamson Act contract on the project site. Therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

- c) ***Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?***

The General Plan EIR did not address conflicts with forest zoning or conversion of forest land. The proposed project is located within the Tahoe National Forest; however, the project site is currently used as a ski lodge and the proposed project would not change the uses at the site. The project site is within the REC zoning district and there would be no conflict with zoning for forest land or timberland production. Therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

- d) ***Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

The General Plan EIR did not address conflicts with forest zoning or conversion of forest land. The proposed project is located within the Tahoe National Forest; however, the project site is currently used as a ski lodge and the proposed project would not change the uses at the site or result in the loss of forest land. The project site includes one mature tree that would be retained. Therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

- e) ***Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

The General Plan EIR did not address agricultural and forestry resources. As previously discussed, the proposed project would not result in the conversion of farmland or forestland to non-agricultural or non-forest use. The project site is currently used as a ski lodge and the proposed project would not change the uses at the site. Therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
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III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project conflict with or obstruct implementation of the applicable air quality plan?***

An area is designated as “in attainment” when it is in compliance with the federal and/or state standards. These standards are set by the U.S. Environmental Protection Agency (EPA) or California Air Resources Board (CARB) for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or public welfare with a margin of safety. Western Nevada County, which includes the project site, is designated as nonattainment for the federal and state ozone (O₃) standards. The eastern part of the county, which includes the project site is in attainment, and thus is not directly included in the attainment plan. The County is also designated as nonattainment for the state particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀) standard. As a nonattainment area, the Northern Sierra Air Quality Management District (NSAQMD) submitted an Ozone Attainment Plan to the EPA (NSAQMD 2018). Once adopted by the EPA, the Ozone Attainment Plan will be a federally enforceable air quality attainment plan for western Nevada County designed to reduce emissions of O₃ precursors (reactive organic gases [ROG], and NO_x) to attain the federal 8-hour O₃ standard by December 31, 2021, in accordance with the Clean Air Act.

This attainment status is reflected in the General Plan EIR (although the EIR was prepared in 2006, the attainment status for the Town and County basically remains unchanged). The Town prepared its own

Particulate Matter Air Quality Management Plan in 1999, in addition to NSAQMD requirements. The EIR found the impacts associated with mobile emissions to be significant and unavoidable, despite implementation of General Plan policies and air quality measures included in the TMC (Section 18.30.030).

Generally, a project would be considered to potentially conflict with the Ozone Attainment Plan if it would result in demographic growth that would exceed the forecasts used in the Plan. It should be noted that the eastern part of the county, which includes the project site is in attainment, and thus is not directly included in the attainment plan. Nevertheless, the following discussion is provided.

Regarding demographic growth, forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) were developed by NCTC for its 2015–2035 Regional Transportation Plan (RTP) (NCTC 2018). The Ozone Attainment Plan relies on the land use and population projections provided in the 2015–2035 RTP, which is generally consistent with the local plans in Nevada County; therefore, the Ozone Attainment Plan is generally consistent with local government plans. The project site is currently zoned REC. As previously discussed, the project includes the replacement of the existing 15,838 SF downhill ski lodge with a new 24,490 SF structure. Therefore, no changes to the existing zoning designations are necessary.

As described in the 2015–2035 RTP, the private service industry in Nevada County has resulted in an increase in 1,230 jobs from 2009 to 2014. Additionally, the private service industry was projected to be the second fastest-growing market through 2022, with an anticipated 15.5% growth rate (NCTC 2018). In general, the project proposes to replace an existing facility and does not propose an expansion of services or operations. During full operations, the project would not result in a net increase of employees. Thus, the project would not result in regional growth that is not accounted for within the Ozone Attainment Plan.

The proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The General Plan EIR found that construction emissions, including diesel particulate matter (PM_{2.5}) and NO_x, an ozone precursor, could be significant. However, the EIR notes that construction on sites of 1 acre or larger are subject to NSAQMD Regulation II, Rule 226: Dust Control. Dust control measures are included in MM-AQ-1 below. Furthermore, Policy P13.3 of the Conservation and Open Space Element would require that all construction projects involving grading implement dust control measures. These measures, which are consistent with the NSAQMD guidelines, are defined in Chapter 18.30.030 of the TMC and would be a condition of approval of the project. With implementation of these policies, development regulations, and MM-AQ-1 the impact from construction would be less than significant.

With regard to non-construction emissions, the General Plan EIR determined the 2025 General Plan would lead to development generating increased emissions that affect both PM₁₀ and ozone levels. Impacts related directly to implementation of the 2025 General Plan would be less than significant with a portion of the impact attributed to development and traffic generated outside of the Town. Since there are no feasible or reasonable measures to mitigate this impact, the General Plan EIR determined that cumulative impacts on air quality associated with both PM₁₀ and ozone were determined to be significant and unavoidable.

To assess whether the project would have a peculiar project or site-specific impact related to emissions of PM₁₀ or ozone precursors, an air quality modeling analysis that identified the project’s impact on air quality was performed. This quantitative analysis is presented below. Per NSAQMD recommendations, unmitigated project-generated emissions that are greater than zero (i.e., at Levels A, B, or C) should be mitigated (NSAQMD 2019). As presented in threshold b), maximum daily unmitigated emissions of ROG would be at Level A and maximum NO_x emissions would be at Level B during construction. Implementation of MM-AQ-2 would reduce ROG and NO_x to less-than-significant levels.

Construction Emissions

For purposes of estimating project emissions, construction of the project is anticipated to occur over 15 months and assumed to take place from May 2023 through July 2024. Sources of air pollutant emissions during construction would include exhaust from off-road equipment and on-road vehicles (i.e., trucks and worker vehicles), fugitive dust associated with grading and material handling, and ROG off-gassing from architectural coatings. Emissions from the construction of the proposed project were estimated using California Emissions Estimator Model (CalEEMod). Specific construction schedule sequencing and subphases for the proposed project have not yet been determined; therefore, a conceptual construction schedule was developed for the purpose of air quality modeling as shown in Table 2.

Table 2. Construction Schedule

Phase Type	Start Date	End Date	Number of Days/Week	Total Days
Demolition	05/01/2023	05/26/2023	5	20
Site Preparation	05/27/2023	06/02/2023	5	5
Grading	06/03/2023	06/09/2023	5	5
Building Construction	06/10/2023	07/12/2024	5	285
Architectural Coating	07/13/2024	08/02/2024	5	15

Source: Appendix A.

Table 3 presents the general construction equipment mix used for the air pollutant emissions modeling of the proposed project. The equipment mix was generally followed for all construction modeling scenarios. For this analysis, it was assumed that heavy construction equipment would be operating at the site for approximately 8 hours a day (or less), 5 days a week (22 days per month), during project construction. However, the construction phases, construction equipment, and equipment hours of operation varied depending on the project component. Default construction worker, vendor trips, and trip lengths as provided in CalEEMod were used with the exception of the haul trips resulting from demolition of the existing ski lodge building and trips necessary to remove excavated soil from the site. The modeling inputs reflect an assumption that 72 one-way trips and 487 one-way trips would occur during the demolition and grading phases. Specific CalEEMod assumptions for each model scenario, including quantity of equipment, are provided in Appendix A.

Table 3. Construction Scenario Assumptions

Construction Phase	Average Daily Worker One-Way Trips	Average Daily Vendor One-Way Trips	Total Haul Truck One-Way Trips	Equipment	Quantity
Demolition	13	0	72	Concrete/Industrial Saws	1
				Rubber Tired Dozers	1
				Tractors/Loaders/Backhoes	3
Site Preparation	8	0	0	Graders	1
				Rubber-Tired Dozers	1
				Tractors/Loaders/Backhoes	1
Grading	10	2	487	Graders	1
				Rubber-Tired Dozers	1
				Tractors/Loaders/Backhoes	2
Building Construction	9	4	0	Cranes	1
				Forklifts	1
				Generator Sets	1
				Tractors/Loaders/Backhoes	1
				Welders	3
Architectural Coating	2	0	0	Air Compressors	1

Source: Appendix A.

Implementation of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, primarily during the grading and site preparation phases, resulting in PM₁₀ and particulate matter with an aerodynamic diameter equal to or less than 2.5 microns (PM_{2.5}) emissions. The proposed project is subject to NSAQMD Rule 226, Dust which requires the submittal and approval of a Dust Suppression Control Plan to the NSAQMD prior to the disturbance of any topsoil. Compliance with Rule 226, specified in MM-AQ-1 below, would limit fugitive dust (PM₁₀ and PM_{2.5}) that may be generated during grading and construction activities. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of ROG, oxides of nitrogen (NO_x), carbon monoxide (CO), PM₁₀, and PM_{2.5}. Table 4 shows the estimated maximum daily construction emissions associated with the construction of the proposed project. Complete details of the emissions calculations are provided in Appendix A. The NSAQMD has established Level A, B, and C thresholds for ROG, NO_x, and PM₁₀. Per the NSAQMD, unmitigated project-generated emissions that are greater than zero are potentially significant and require mitigation.¹ While no numeric thresholds have been established for CO, SO_x, or PM_{2.5}, emissions are presented for disclosure.

¹ Following implementation of NSAQMD-recommended mitigation measures (as specified separately for Level A, B, and C) only emissions that exceed Level C thresholds are considered significant and unavoidable.

Table 4. Maximum Daily Project Emissions - Unmitigated

Source	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Pounds per Day					
2023	1.61	29.33	14.00	0.08	9.49	4.59
2024	38.04	11.31	12.86	0.02	0.55	0.46
Maximum Daily Emissions	38.04	29.33	14.00	0.08	9.49	4.59
<i>NSAQMD Significance Threshold Level</i>	<i>Level B (24-136)</i>	<i>Level B (24-136)</i>	<i>N/A</i>	<i>N/A</i>	<i>Level A (<79)</i>	<i>N/A</i>

Source: Appendix A

Notes: ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter with an aerodynamic diameter equal to or less than 10 microns; PM_{2.5} = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; NA = not applicable; NSAQMD = Northern Sierra Air Quality Management District.

Significance is based on NSAQMD thresholds. For Level A or B criteria, emissions are considered potentially significant and trigger mitigation. If the emissions exceed the Level C threshold, they are considered significant and require greater mitigation. After incorporation of feasible mitigation, emissions at Level A or B would be less than significant, and emissions at Level C (i.e., >136 pounds per day) would be significant and unavoidable.

As shown in Table 4, daily unmitigated emissions of ROG, NO_x would exceed the NSAQMD level B thresholds, and PM₁₀ would exceed the Level A threshold. No criteria air pollutants would be at Level C. The NSAQMD does not have significance criteria for SO_x, CO, or PM_{2.5}.

The following mitigation measures are required:

MM-AQ-1 Dust Control Plan. The project applicant shall prepare a Dust Control Plan pursuant to NSAQMD Rule 226 (Dust Control) and Title 18 of the TMC. The Dust Control Plan must be submitted to and approved by the Air Pollution Control Officer before topsoil is disturbed. The Air Pollution Control Officer may require use of palliatives, reseeding, or other means to minimize windblown dust. After commencement of development, if the approved elements of the dust control plan prove ineffective, the Air Pollution Control Officer may require additional control measures to be instituted.

MM-AQ-2 Criteria Air Pollutants. The project applicant shall implement the following measures in order to mitigate criteria air pollutants exceeding the NSAQMD level A and level B thresholds during project construction:

Level A.

- a. Alternatives to open burning of vegetative material will be used unless otherwise deemed infeasible by the District. Among suitable alternatives are chipping, mulching, or conversion to biomass fuel.
- b. Grid power shall be used (as opposed to diesel generators) for job site power needs where feasible during construction.

Level B.

- c. Controls specified above (a and b) shall be implemented.

- d. Temporary traffic control shall be provided during all phases of the construction to improve traffic flow as deemed appropriate by local transportation agencies and/or Caltrans.
- e. Construction activities shall be scheduled to direct traffic flow to off-peak hours as much as practicable.

Note that NSAQMD-recommended mitigation for Level B also includes limitations on residential wood burning appliances. This is not applicable to the proposed project.

Operational Emissions

Operation of the project would produce ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from area sources, including natural gas combustion and use of consumer products. Notably, because the project is not proposing to increase use at the ski area or increase traffic within the project area, mobile emissions due to the replacement of existing buildings were not quantified. The estimation of proposed operational emissions was based on proposed land use defaults and total area (i.e., square footage) of buildings that would be in operation by 2025 (first year of operation).

Table 5. Maximum Daily Operational Criteria Air Pollutant Emissions

Source	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Pounds per Day					
Existing Ski Lodge						
Area	0.49	<0.01	<0.01	0.00	0.00	0.00
Energy	0.01	0.09	0.08	<0.01	<0.01	<0.01
Total Existing Emissions	0.05	0.09	0.08	<0.01	<0.01	<0.01
Proposed Project						
Area	0.68	<0.01	<0.01	0.00	<0.01	<0.01
Energy	0.06	0.50	0.42	<0.01	0.04	0.04
Emergency Generator	2.20	9.83	5.61	0.01	0.32	0.32
Total Project Emissions	2.94	10.33	6.03	<0.01	0.36	0.36
Net Change (Project - Existing)	2.44	10.24	5.95	0.01	0.36	0.36
<i>NSAQMD Significance Threshold Level</i>	<i>Level A</i>	<i>Level A</i>	<i>NA</i>	<i>NA</i>	<i>Level A</i>	<i>NA</i>

Source: Appendix A.

Notes: ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter with an aerodynamic diameter equal to or less than 10 microns; PM_{2.5} = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; NSAQMD = Northern Sierra Air Quality Management District; <0.01 = reported value less than 0.01.

As shown in Table 5, estimated operational emissions of ROG, NO_x, and PM₁₀, while greater than zero, would not exceed the NSAQMD’s Level A threshold. The project emissions are based on conservative estimates that likely over-report the potential emissions. Much of the expansion space is classified as “restaurant” for purposes of emissions modeling, which is an energy-intensive use. The operational emissions also assume an emergency generator that would be tested monthly. The project is consistent with the General Plan EIR analysis. Regarding operational emissions, the project would not result in new or

more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

The General Plan EIR found that a potentially significant impact could result from development located near I-80 or the Union Pacific Railroad line. This impact would be reduced with implementation of General Plan goals and policies. The General Plan EIR also found that potential carbon monoxide concentrations (aka hotspots) would not be a significant impact.

The potential site-specific impacts from emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous air pollutants (HAPs), respectively, as well as CO hotspots, are discussed below.

Health Impacts of Toxic Air Contaminants

Construction of the proposed project would involve the use of diesel-fueled vehicles used during site preparation, grading, building construction, paving, and application of architectural coatings. Diesel particulate matter (DPM) is the primary TAC of concern during these construction activities. Notably, on-road diesel trucks traveling to and from the proposed project would be less of a concern because they would not stay on the site for long durations. The following measures are required by state law to reduce diesel particulate emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, Section 2449), the purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project. The project would not require the extensive use of heavy-duty construction equipment or diesel trucks in any one location over the duration of development, which would limit the exposure of any proximate individual sensitive receptor to TACs. Furthermore, due to the relatively short period of exposure at any individual sensitive receptor and minimal particulate emissions generated on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks.

According to the NSAQMD, no naturally occurring asbestos (NOA) has been mapped in the project area. However, MM-AQ-3 below specifies management procedure in case NOA is identified during project construction, which would reduce impacts to less-than-significant levels. Materials used for surfacing would also be required to comply with the *Asbestos Airborne Toxic Control Measure for Surfacing Applications* (Surfacing ATCM).

MM-AQ-3 Asbestos. If naturally occurring asbestos (NOA) is identified during earthwork, the NSAQMD must be notified no later than the following business day and compliance with the statewide *Asbestos Toxic Control Measure for Construction, Grading, Quarrying and Surface Mining Operations* (Asbestos ATCM) would be required. In regard to surfacing materials, the project is required to comply with the statewide *Asbestos Airborne Toxic Control Measure for Surfacing Applications* (Surfacing ATCM), which prohibits the use of material containing 0.25% asbestos or greater for surfacing of areas such as pedestrian walkways and pavement.

Health Impacts of Carbon Monoxide

Mobile source impacts occur on two scales of motion. Regionally, project-related travel would add to regional trip generation and increase vehicle miles traveled (VMT) within the local airshed and the Mountain Counties Air Basin (MCAB). Locally, project-generated traffic would be added to the County's roadway system near the project site. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds and is operating on roadways already crowded with non-project traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. However, because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the MCAB is steadily decreasing.

The NSAQMD thresholds of significance for local CO emissions are the 1-hour and 8-hour CAAQS of 20 ppm and 9 ppm, respectively. By definition, these represent levels that are protective of public health. As noted previously, Nevada County is currently designated attainment for both state and national CO ambient air quality standards, and the County typically experiences low background CO concentrations. The primary mobile-source criteria pollutant of local concern is CO which would occur due to construction activities.

Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site" (California Code of Regulations Title 40 Section 93.123). Since construction activities would be temporary and would occur over a short duration (15 months), a project-level construction hotspot analysis would not be required. As previously discussed, because the project is not proposing to increase use at the ski area or increase traffic within the project area, mobile emissions due to the replacement of existing buildings were not quantified. Therefore, the proposed project would not significantly contribute to a CO hotspot.

d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The General Plan EIR found that impacts related to odors would be less than significant with implementation of General Plan policies. Construction and operation of the project would result in various emissions; however, criteria air pollutants, fugitive dust, and toxic air contaminants are addressed under thresholds b) and c). As such, the threshold d) analysis is focused on the potential for the project to result in odor impacts. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Some of these activities would continue with project operations. However, such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people.

Land uses and industrial operations that typically are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, solid waste transfer stations, rendering plants, dairies, and fiberglass molding. The project does not propose the aforementioned odor-generating land uses and would not result in odors that would adversely affect a substantial number of people. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
IV. BIOLOGICAL RESOURCES – Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Biological Impacts were analyzed in the Town of Truckee 2025 General Plan EIR on pages 4.3-1 through 4.3-22. The Truckee Basin and adjacent upland and mountain areas are rich in biological resources, both within the Town and in the surrounding region. Several special status habitats, plant species, and wildlife species have been identified in the Truckee area. Important biological resources include both vegetation and habitat areas, as well as wildlife corridors and migration routes that traverse the Town. The EIR determined that implementation of goals, policies, and actions would reduce potentially significant impacts to biological resources to a less-than-significant level.

a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Truckee’s 2025 General Plan Environmental Impact Report evaluated potential impacts to special-status species that would occur with development in Truckee in Chapter 4.3, Biological Resources. The analysis contained in that chapter of the EIR found that incorporation of goals, policies, and actions (mitigation measures) would reduce potentially significant impacts to special status plant and wildlife species from proposed development to a less-than-significant level. Review of records maintained by the California Natural Diversity Database indicates that historical occurrences of several plant and animal with special status have been reported from the Truckee planning area. Special status plant species with the potential to occur in the Planning Area include the Donner Pass buckwheat, Oregon fireweed, *Plumas ivesia*, and Tahoe yellow cress. Development associated with implementation of the General Plan could have adverse impacts on several special-status animal species if they are present within areas permitted for future development.

To offset potential impacts to sensitive plant species, the General Plan includes several goals, policies, and actions related to the protection of these resources. Goal COS-5 in the Conservation and Open Space Element of the General Plan calls for maintaining biodiversity among plant and animal species in the Town of Truckee and the surrounding area, with special consideration of species identified as sensitive, rare, declining, unique, or representing valuable biological resources. In support of this goal, Conservation and Open Space Policy 5.1 requires biological resource assessments for all development in areas where special status species may be present, and Conservation and Open Space Policy 5.3 says that preservation of federal or State-designated endangered, threatened, special status or candidate species should be protected to the extent possible.

To further offset impacts from development there are numerous goals, policies and actions aimed at preserving open space resources, which mostly serve as habitat as well. These include Goal LU-7, which would preserve scenic open space through clustering of development and Goal CC-2, which calls for the protection of the Truckee River and other natural waterways.

Conservation Element Policy P5.1 requires biological resource assessments for all development in areas where special status species may be present and Policy P5.3 requires, to the extent possible, protection of federal or State-designated endangered, threatened, special status or candidate species.

The *Biological Resources Assessment for the ±3-Acre Tahoe Donner Downhill Lodge Project* (Salix 2022) identified fourteen (14) special-status animals through the database search as potentially occurring within the broader region surrounding the Study Area, and of those, four (4) were determined to have at least some potential to occur. Except for yellow warbler, it is unlikely that other special-status species would occur on the project site due to the absence of suitable habitat. Similarly, of the 22 potentially occurring plant species, three (3) plant species were determined to have some potential to occur within the study area, but they are still all unlikely to occur. Therefore, the likelihood of the site supporting rare plants is extremely low, particularly where the new building footprint will be situated.

The *Biological Resources Assessment* found that the study area presents suitable, but marginal, nesting habitat for special-status species yellow warbler (California Species of Special Concern) and a variety of common bird species that are protected by the Migratory Bird Treaty Act. Impacts to protected bird species would represent a potential site-specific impact. Therefore, mitigation recommended by the Biological Resources Assessment is incorporated into the project. Compliance with MM-BIO-1 would reduce impacts to nesting birds to less-than-significant levels.

MM-BIO-1 **Protection of Active Bird Nests.** If ground disturbance activities take place during the breeding/nesting season (March through August), a preconstruction bird nest survey is required and shall be conducted by a qualified biologist no more than 15 days prior to initiation of proposed construction activities. If no active nests are identified during the preconstruction survey, no further actions or restrictions are required. If active nests are found on or immediately adjacent to the site, a nest avoidance plan shall be prepared and implemented with approval from the Town of Truckee and if the Town requests, CDFW. The avoidance plan shall identify appropriate nest buffer zones within which project activities will be precluded to ensure no harm or agitation of nesting birds occurs and a qualified biologist shall monitor the nest(s) and project activities to ensure the buffer zones are adhered to until the nesting birds have fledged. Once the nesting birds have fledged from active nests, there is no longer a need for a nest avoidance plan or to enforce any related nest buffer zones, and project activities could then proceed without any bird nest-related restrictions.

b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

As analyzed in the Aquatic Resources Delineation for the Tahoe Donner Downhill Lodge Project (Salix 2022), there are two drainages lined with riparian scrub habitat present within the southeast portion of the project area that are considered wetland swales. Alder Creek is also located offsite to the northwest. The project would incorporate the goals, policies, and actions set forth in the Conservation and Open Space Element of the Town of Truckee 2025 General Plan EIR.

The 2025 General Plan includes Conservation and Open Space Policy 4.4 which seeks to preserve riparian corridors through application of setbacks and other development standards. Policy 4.5 prohibits development within established setback areas for streams and waterways other than the Truckee River, except as otherwise allowed in the TMC. TMC Section 18.38.040 requires the following setbacks from stream and waterways:

- Structures proposed on parcels with an average depth of 175 feet or more shall be set back a minimum of 50 feet from the edge of the 100-year floodplain of any stream;
- The required stream setback for structures proposed on parcels with an average depth of less than 175 feet shall be determined by the following formula, except that no setback shall be less than 20 feet.
- Structures proposed adjacent to streams for which the 100-year floodplain has not been determined or mapped shall be set back a minimum of 100 feet from the centerline of the stream channel;
- Structures proposed adjacent to streams that have been channelized by manmade improvements prior to the adoption and effective date of this Development Code shall be set back a minimum of 20 feet from the improvements. Channelized shall mean improvements that have altered and replaced the natural alignment of the stream.

Alder Creek is located approximately 246 feet from the project site. The 100-year floodplain for Alder Creek in this location has not been mapped. However, the 246-foot distance is in compliance with the required 100-foot minimum setback from the centerline of a stream channel where the 100-year floodplain has not been determined or mapped. These goals, policies, and actions would reduce potentially significant impacts to riparian habitat or other sensitive natural community to a less-than-significant level. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. The proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the EIR.

c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

As analyzed in the Aquatic Resources Delineation for the Tahoe Donner Downhill Lodge Project (Salix 2022), there are two drainages on the project site that are considered wetlands swales because they are vegetated with hydrophytic plants and carry only low water flows.

To address this potential impact of development on wetlands and waters of the US, there are several goals, polices and actions set forth in the General Plan that would reduce potential impacts to a less-than-significant level. Goal COS-4 calls for protection of areas of significant wildlife habitat and sensitive biological resources, which includes wetlands. Policy 4.4, in support of this goal, calls for preservation of aquatic and wetland areas through application of setbacks and other development standards. Policy 4.5 prohibits development within established setback areas for streams and waterways other than the Truckee River, except as otherwise allowed in the TMC.

Action A4.1 calls for cooperation with the CDFW and USFWS to prepare a comprehensive plan for the management and protection of sensitive biological resources such as wetlands.

The level of development, including building area, in the proposed project is consistent with that considered in the EIR. The circumstances of the project have not changed; the existing conditions at the project site are the same as those described in the EIR. No new impacts to the wetland are proposed. The proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the EIR. No new impacts to wetlands would occur.

TMC Section 18.30.050 requires Minor Use Permit approval for any projects resulting in the disturbance of land or located within 200 feet of any wetland. As discussed in the Tahoe Donner Lodge Preliminary Drainage Report (Auerbach 2022), grading for the proposed project does not encroach on or disturb the aquatic resources or the 100- year flood limit for the eastern wetland swale. LRQWCB also reviewed the project and did not identify any concerns.

The proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the EIR.

d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

As stated in the Town of Truckee 2025 General Plan, wildlife movement corridors are another important component of the natural environment in Truckee. Areas of undisturbed, continuous vegetation provide wildlife movement corridors that are considered a sensitive resource within the Town of Truckee. These corridors are used by both local and migratory species of deer, bear, coyote, skunk, raccoon, mountain beaver, and Northern goshawk. Given the importance of these resources to wildlife in the Town of Truckee and the vicinity, the Conservation and Open Space Element has set forth several Goals, Policies and Actions to address potentially adverse impacts.

Conservation and Open Space Policy 4.1 requires the Town to provide for the integrity and continuity of wildlife movement corridors and support the permanent protection and restoration of these areas, particularly those identified as sensitive resources. Policy 4.2 calls for protection of sensitive wildlife habitat from destruction and intrusion by incompatible land uses where appropriate. The policy says that all efforts to protect sensitive habitats should consider sensitive habitat and movement corridors in the areas adjacent to development sites, as well as on the development site itself.

These polices would ensure that implementation of the 2025 General Plan would result in less-than-significant impacts to wildlife movement in Truckee or its vicinity.

Because the project site is largely fragmented due to existing development and roadways that bisect the project site and is surrounded by existing development, the suitability of the site as a migratory corridor or nursery site is low. The level of development, including area of disturbance, in the proposed project is consistent with that considered in the EIR. No changes in the amount of proposed development or the environmental or regulatory setting have occurred. Therefore, the project would have a less-than-significant impact on migratory corridors and nursery sites.

The analysis under the Truckee General Plan EIR remains accurate with respect to the proposed project, which would be developed on existing developed land in accordance with the provisions of the General Plan and would occur within the area previously evaluated. With implementation of Goals, Policies, Actions, and Uniformly Applied Development Standards the project's impacts would be less than significant and would be consistent with the analysis in the Truckee General Plan EIR. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the EIR.

e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

The LRWQCB plan for the Lahontan Region (Basin Plan) contains a prohibition on discharges to the Truckee River, Little Truckee River, and its tributaries, including the rivers, tributaries and 100-year flood plain. As mentioned above, grading for the proposed project does not encroach on or disturb the aquatic resources or the 100-year flood limit for the eastern wetland swale. Additionally, the proposed project is also required to prepare and implement a Stormwater Pollution Prevention Program (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements. The SWPPP would identify best management practices (BMPs) that are intended to prevent pollution from project construction activity from entering local waterways.

TMC Section 18.30.155 includes Tree Preservation standards that support preservation and protection of existing trees. The section specifically protects existing distinctive trees of 24-inch diameter at breast height (DBH) or greater unless retention of the tree(s) would unreasonably compromise the development of the land or would interfere with achieving other Town goals and objectives. This section also includes requirements to protect trees through a Tree Protection Plan that include identification of all trees and species on a site that are six inches DBH or greater requirements, fencing at the dripline or at the limits of grading, avoiding disturbance in driplines. The TMC also contains several provisions that affect riparian habitat and wetlands. Chapter 18.38 – Lake and River/Stream Corridor Development provides standards for development adjacent to Donner Lake, the Truckee River, and other significant streams throughout the Town to provide appropriate buffer areas. Section 18.46.040 of the Zoning Code's Open Space/Cluster Requirements chapter specifies that wetlands are environmentally sensitive areas that should be preserved.

The project site includes only one existing 34-inch DBH pine located to the south of the proposed building that is proposed to be retained. The project does not conflict with any local policies or ordinances protecting biological resources. Rather, policies and actions in the General Plan Update direct the Town to continue to implement ordinances that protect biological resources or amend ordinances to become more protective of these resources. Since the 2025 General Plan does not conflict with adopted ordinances and policies, and in fact includes policies and actions to support them, no impact would occur under implementation of the project.

The Truckee General Plan EIR evaluated development proposed in the project area and whether there would be a conflict with local policies or ordinances protecting biological resources resulting from the construction or operation of development. It was determined no impact would occur. As previously analyzed, the project site would not conflict with any local policies or ordinances protecting biological resources, and therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the EIR. No new impacts related to policies and ordinances protecting biological resources would occur.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

As described under Impact Discussion 4.3-21 of the Biological Resources section of Town of Truckee 2025 General Plan EIR, there are no Habitat Conservation Plans or Natural Community Conservation Plans in effect for the project site. Further, the Town of Truckee does not have any locally established conservation plans in place nor have any plans been established for the Town of Truckee or its Sphere of Influence by the California Department of Fish and Game. As a result, no conflicts with such plans would occur through implementation of the project.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
V. CULTURAL RESOURCES – Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

The General Plan EIR found that development in areas containing buildings with historic significance, especially the downtown area, would have the potential to impact historical resources. Recognizing this concern, the Community Character Element of the General Plan includes Goal CC-18, which calls for the preservation and enhancement of the Town’s historic and cultural resources. Policy P18.1 would require evaluation of impacts to historic resources for projects which involve substantial site disturbance, or

demolition or alteration of known historic building. This policy would apply to discretionary projects subject to CEQA, as well as ministerial projects with the potential to affect buildings that are 50 years older or more. It was determined that compliance with the General Plan would reduce impacts to historical resources to a less-than-significant level.

As defined by the CEQA Guidelines, a “historical resource” is considered to be a resource that is listed in or eligible for listing in the California Register of Historic Resources (CRHR), has been identified as significant in a historical resource survey, or is listed on a local register of historical resources. Historical resources eligible for listing in the CRHR must meet one of the following criteria (CCR Section 4852(b)) and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance (CCR Section 4852(c)):

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Although the existing ski lodge building is older than 50 years, the building does not meet any of the above criteria. Additionally, the project site is not included in the Town’s Historic Preservation Overlay District and is therefore not part of the Historic Resources and Architectural Inventory. The existing ski lodge was built in 1971 and has undergone upgrades and remodeling over the years. The proposed project would have no impact associated with the removal of historically significant properties and/or the integrity of such resources because the project site does not contain any historical resources, nor is it located near an identified historical resource; therefore, the potential to discover any historic-era resources is low. Therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

The General Plan EIR determined that development allowed under the 2025 General Plan would involve construction activities that could result in the disturbance of undiscovered archaeological or paleontological resources during grading or other on-site excavation activities. Policies under Goal CC-19 would have the Town identify and protect archaeological and paleontological resources. As a safeguard, the Town would require proper archaeological or paleontological surveying, testing, research, documentation, monitoring and safe retrieval of archaeological and cultural resources, as part of the development review process (Community Character Policy P19.1). Furthermore, Community Character Policy P19.2 would require an archaeological survey by a qualified professional whenever there is evidence of an archaeological or paleontological site within a proposed project area, determined to be a high likelihood for occurrence of such sites, or where a project involves substantial site disturbance. These requirements are implemented through the TMC, Section 18.030.040.

Section 18.30.040 requires both of the following:

A. General standard. In the event that archaeological or cultural resources are discovered during any construction, all construction activities shall cease within 200 feet of the find unless a lesser distance is approved by the Director, and the Department shall be notified so that the extent and location of discovered materials may be recorded in a written report prepared by a qualified archaeologist, and disposition of discovered materials may occur in compliance with State and Federal law. Construction shall not recommence until the Director authorizes construction to begin.

B. Survey. The Director shall require a cultural resources field survey by a qualified professional, at the applicant's expense, where the project will involve areas of grading and/or the removal of natural vegetation totaling one acre or larger or where the project will involve the disturbance of ground in the -HP overlay district. The Director may require a cultural resources field survey on smaller sites for a Zoning Clearance, Development Permit, Minor Use Permit, Use Permit, Planned Development or Tentative Map where there is the potential for cultural resources to be located on the project site. Compliance with the General Plan would result in less-than-significant impacts to archaeological resources.

Although the total site is over 1 acre, the site has already been disturbed, and is partially occupied by the existing ski lodge and ski hill operations. It is unlikely that project construction would unearth any subsurface archaeological resources. However, if any archaeological resources are discovered, then proper testing, documentation, monitoring, and retrieval would be required. Compliance with the General Plan and TMC would ensure that the proposed project's impacts would not result in new or substantially more severe impacts than identified in the General Plan EIR.

c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

The General Plan EIR determined that development under the General Plan would involve construction activities that may disturb human remains. Regarding potential disturbance of sacred native burials during development, General Plan Community Character Policy P19.3 requires consultation with representatives of the Native American community whenever necessary to ensure the respectful treatment of Native American sacred places. It was determined that compliance with General Plan policies would result in less-than-significant impacts to human remains.

The proposed project would comply with General Plan Community Character Policy P19.3 regarding the disturbance of native burial sites. Additionally, the project would be subject federal and state regulations regarding the discovery of human remains, specifically California Health Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Therefore, the proposed project's impacts would be less than significant and would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

3.6 Energy

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
VI. Energy – Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The General Plan EIR did not make a determination if consumption of energy would be a potentially significant impact because energy was not included as a topic in Appendix G of the CEQA Guidelines at the time. However, the EIR does note that General Plan Goal COS-14, and supporting policies P14.3, P14.4, and P14.5, would promote conservation and reduce the consumption of energy.

The project includes the replacement of the existing 15,838 SF downhill ski lodge with a new 24,490 SF structure. The one-time construction energy demand and the operational net change in energy demand are evaluated below.

Construction

Energy use during project construction (including demolition) associated with the ski lodge would primarily occur in association with fuel use by vehicles and other equipment to conduct construction activities.

Electricity

The electricity demand at any given time would vary throughout the project construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. The electricity used for construction activities would be temporary and minimal; it would be within the supply and infrastructure service capabilities of Truckee Donner Public Utility District (TDPUD) and it would not require additional local or regional capacity. The electricity demand during construction is anticipated to be minimal because the project would be built during a temporary 15-month construction duration and construction activities would cease upon completion. The electricity used for project construction activities would be temporary and minimal.

Natural Gas

Natural gas is not anticipated to be required during project construction. Peak energy demand specifically applies to electricity; because natural gas (and petroleum) are liquid, these energy resources do not have the same constraints as electricity supply. Nonetheless, if any natural gas is needed, it would be sufficiently served by existing supply from Southwest Gas and would not require additional local or regional capacity. Any minor amounts of natural gas that may be consumed as a result of construction would be temporary and negligible and would not have an adverse effect.²

Petroleum

Off-road equipment used during construction of the project would primarily rely on diesel fuel, as would vendor trucks involved in delivery of materials to the project site, haul trucks exporting demolition material, and haul trucks importing or exporting soil, and other materials to and from the project site. In addition, construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel in gasoline-powered light-duty vehicles, based on the regional average commute length.

The estimated diesel fuel usage from construction equipment, haul trucks, and vendor trucks and the estimated gasoline fuel usage from worker vehicles are shown in Table 6. Appendix A lists the assumed equipment usage and vehicle trips.

Table 6. Total Proposed Project Construction Petroleum Demand

Project	Off-Road Equipment (Diesel)	Haul Trucks (Diesel)	Vendor Trucks (Diesel)	Worker Vehicles (Gasoline)
	Gallons			
Total Petroleum Demand	28,413	1,597	1,135	1,205

Source: Appendix A.

Notes: Subtotals and totals may not sum due to rounding.

In summary, construction associated with the development of the proposed project is estimated to consume a total of approximately 1,205 gallons of gasoline and 31,145 gallons of diesel. Notably, the project would be subject to CARB’s In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Overall, the project would not be unusual as compared to

² While no natural gas is anticipated to be used during construction because construction equipment is typically diesel fueled, the possibility of natural gas use is acknowledged in the event a natural-gas-fueled piece of equipment is used. However, as noted previously, all equipment was assumed to be diesel fueled in CalEEMod.

overall local and regional demand for energy resources and would not involve characteristics that require equipment that would be less energy efficient than at comparable construction sites in the region or state.

Therefore, because petroleum use during construction would be temporary and would not be wasteful or inefficient, impacts would be less than significant.

Operations

Electricity

Project operation would require electricity for multiple purposes including, but not limited to, building heating, ventilation, and air conditioning (HVAC), lighting, appliances, and electronics. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. CalEEMod was used to estimate the project electricity uses (see Appendix A for calculations). Default electricity generation rates in CalEEMod were used based on the proposed land use and climate zone.

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The project would meet the 2019 California Building Energy Efficiency Standards (24 CCR, Part 6) at a minimum and it is anticipated that the project would be subject to the 2022 Title 24 code. The project's operational energy emissions were assumed to meet the 2019 Title 24 Standards, the default assumptions in CalEEMod Version 2020.4.0. According to these estimates, the buildout of the project would consume approximately 550,671 kWh per year. The existing ski lodge would consume approximately 144,936 kWh per year. As such, upon project implementation, electricity demand at the project site would increase by 405,735 kWh per year. The increase in electricity use at the project site is due to the increase in square footage. Notably, the proposed project would include the replacement of the older ski lodge which would be less energy efficient compared with the newer facilities proposed.

For these reasons, electricity consumption of the project would not be considered inefficient, wasteful, or unnecessary, and impacts would be less than significant.

Natural Gas

Natural gas consumption during operation would be required for various purposes, including, but not limited to, building heating and cooling.

Default natural gas generation rates in CalEEMod for the proposed land use and climate zone were used and adjusted based on compliance with 2019 Title 24 for restaurant and office uses (see Appendix A for calculations). According to these estimations, the proposed project would consume approximately 1,861,824 thousand British thermal units (kBtu) per year. The existing uses natural gas consumption was estimated to be approximately 346,219 kBtu. As such, upon project implementation, natural gas demand at the project site would increase by approximately 1,515,605 kBtu per year.

Although natural gas consumption would increase due to the implementation of the proposed project, the building envelope; heating, ventilation, and air conditioning; lighting; and other systems shall be designed to maximize energy performance. The proposed project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains voluntary energy measures that are applicable to the proposed project under the California Green Building

Standards Code. Prior to proposed project approval, the proposed project would meet Title 24 requirements applicable at that time, as required by state regulations through their plan review process. For these reasons, the natural gas consumption of the proposed project would not be considered inefficient or wasteful, and impacts would be less than significant.

Petroleum

As previously discussed, because the project is not proposing to increase use at the ski area or increase traffic within the project area, mobile emissions and petroleum consumption, due to the replacement of existing buildings were not quantified.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR, Part 6) 2019 standards, but would likely be subject to the 2022 Title 24 standards. Part 6 of Title 24 establishes energy efficiency standards for non-residential buildings constructed in California in order to reduce energy demand and consumption. Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the project under the California Green Building Standards Code. Because the project would comply with the existing energy standards and regulations, the project would result in a less than significant impact associated with the potential to conflict with energy standards and regulations.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
VII. GEOLOGY AND SOILS – Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

i) ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

The General Plan EIR found that buildout of the General Plan would have no impact regarding fault rupture hazards because the Town is not located within an Alquist-Priolo fault rupture hazard zone and there are no known active surface fault ruptures. The proposed project would therefore not be located in an area subject to earthquake fault ruptures. The proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

- ii) Strong seismic ground shaking?*
- iii) Seismic-related ground failure, including liquefaction?*
- iv) Landslides?*

The General Plan EIR determined that faults just outside of the Town boundary are capable of generating earthquakes of significant magnitude, potentially producing ground shaking in the Town of Truckee. Recognizing that there is still a risk to the Town from primary and secondary seismic hazards, the Safety Element in the 2025 General Plan includes several policies and actions intended to minimize this risk. For example, Safety Element Policy P1.2 encourages the retrofitting of structures, particularly older buildings, to withstand earthquake shaking and landslides, and adhering to design and engineering techniques that minimize the risk of damage from seismic events and land sliding. Furthermore, Safety Element Policy P1.3 requires that soils reports be completed for new development in areas where geologic risks are known to exist and that these reports include recommendations for appropriate engineering and other measures to address identified seismic risks. As a result of the policies and actions included in the 2025 General Plan, the potential impacts associated with seismic hazards would be reduced to a less than significant level.

In accordance with General Plan policies, the proposed project would be built to withstand seismic ground shaking and secondary seismic hazards by complying with all state seismic and building standards and building code requirements for building material and reinforcement. Additionally, a Geotechnical Engineering Report was prepared for the project (NV5 2021). No liquefaction or landslide hazards were observed in the project area. Due to the previously graded nature of the site and general competent nature of site soil, the potential for slope instability is considered low. The Geotechnical Report includes recommendations for earthwork, structural improvement and seismic design criteria. The proposed project would comply with relevant building standards and recommendations in the Geotechnical Report, which would ensure that project buildings are designed to resist stresses produced by earthquakes. Therefore, the proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

- b) Would the project result in substantial soil erosion or the loss of topsoil?*

The General Plan EIR acknowledges that soils are especially susceptible to erosion when exposed as a result of construction activities such as clearing and grading. It was determined that policies contained in the 2025 General Plan Safety Element would ensure that hazards associated with soil conditions would reduce impacts to a less-than-significant level. For example, Policies P1.1 and P1.3 of the Safety Element require consideration of the location of new residential development in relation to steep slopes and areas of unstable soils and that soils reports be completed for new development in areas where geologic risks are known to exist.

According to the Geotechnical Report, project site soils predominantly consist of loose to very dense silty sand with varying amounts of gravel, cobbles, and boulders (NV5 2021). The proposed project would comply with building code requirements for erosion control and site-specific geotechnical engineering recommendations included in the Geotechnical Report. Recommendations in the Geotechnical Report include re-vegetating or armoring all cut/fill slopes to reduce erosion potential. Compliance with these recommendations would ensure that the proposed project would not result in substantial soil erosion or

loss of topsoil. Therefore, the proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

- c) ***Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

As previously discussed, the General Plan EIR determined that there is a risk to the Town from secondary seismic hazards such as landslides and liquefaction. The Safety Element in the 2025 General Plan includes several policies and actions intended to minimize these risks. For example, Safety Element Policy P1.3 requires that soils reports be completed for new development in areas where geologic risks are known to exist and that these reports include recommendations for appropriate engineering and other measures to address identified seismic risks. It was determined that compliance with General Plan goals and policies would reduce impacts to a less-than-significant level.

According to the Geotechnical Report, no landslides, debris flows or rockfall hazards were observed in the project area. Due to the previously graded nature of the site and general competent nature of site soil, the potential for slope instability is considered low. The soils were also determined to have a low potential for liquefaction. Since it is anticipated that there is a low potential for liquefaction of soil at the site, the potential for lateral spreading to occur is also considered low. Therefore, the proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

- d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

The General Plan EIR determined that since all of the soils in the Truckee area are mainly comprised of sand, they pose a very low risk of expansion and impacts would be less than significant. The Geotechnical Report determined that there are no potentially expansive soils at the site. Therefore, the proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

- e) ***Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

The proposed project would not include septic tanks or alternative wastewater disposal systems and would tie into the Truckee's sanitary sewer system. Therefore, the proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

- f) ***Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

The General Plan EIR determined that the construction activities could result in the disturbance of undiscovered paleontological resources during grading or other on-site excavation activities. However, it was found that this impact could be mitigated by General Plan policies that require proper paleontological testing, research, and documentation (Community Character Policy P19.1) and surveying by a qualified

professional (Community Character Policy P19.2) whenever there is evidence of an archaeological or paleontological site within a proposed project area, is determined to be a high likelihood for occurrence of such sites, or where a project involves substantial site disturbance. The compliance with General Plan policies would ensure that buildout of the 2025 General Plan would result in less-than-significant impacts to paleontological resources.

As previously discussed above under 3.5, Cultural Resources, the proposed project would comply with General Plan Policies P19.1 and P19.2 of the Community Character Element. The site has already been disturbed and is partially occupied by the existing ski lodge. It is unlikely that project construction would unearth any subsurface archaeological resources. However, If any archaeological resources are discovered, then proper testing, documentation, monitoring, and retrieval would be required. Compliance with the General Plan would ensure that the proposed project’s impacts would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
VIII. GREENHOUSE GAS EMISSIONS – Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

The General Plan 2025 EIR did not include an analysis of climate change or quantify greenhouse gas (GHG) emissions related to implementation of the General Plan 2025 because GHGs were not included as a topic in Appendix G of the CEQA Guidelines at the time. The courts have examined the issue of using prior EIRs which did not expressly analyze GHG emissions or climate change and determined that climate change does not constitute “new information” within the meaning of Guidelines Section 15162, as the science of climate change has been understood for some time (see *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515). Not including such analysis in the prior EIR was a choice that could have been challenged at the time the EIR was certified, and its lack of inclusion does not invalidate the use of that EIR.

Therefore, this discussion is limited to the conditions of using Guidelines Section 15183 to evaluate the proposed project, and specifically if there are peculiar conditions related to the project or project site that would require us to reconsider the impacts of GHG emissions. GHG emissions for the project are quantified for disclosure purposes and are analyzed within the context of whether or not such emissions would be peculiar compared to the expected implementation of the 2025 General Plan.

At this time, neither the NSAQMD nor the Town has adopted numerical thresholds of significance for GHG emissions that would apply to the project. The NSAQMD, however, recommends that all projects subject to CEQA review be considered in the context of GHG emissions and climate change impacts, and that CEQA documents include a quantification of GHG emissions from all project sources, as well as minimize and mitigate GHG emissions as feasible. The project would generate GHG emissions through short-term construction activities and long-term operational activities.

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. The Governor's Office of Planning and Research (OPR) Guidance does not include a quantitative threshold of significance to use for assessing a proposed development's GHG emissions under CEQA. Moreover, CARB has not established such a threshold or recommended a method for setting a threshold for proposed development-level analysis.

In light of the lack of established GHG emissions thresholds that would apply to the project, CEQA allows lead agencies to identify thresholds of significance applicable to a project that are supported by substantial evidence. Substantial evidence is defined in the CEQA statute to mean "facts, reasonable assumptions predicated on facts, and expert opinion supported by facts" (14 CCR 15384(b)).³ Substantial evidence can be in the form of technical studies, agency staff reports or opinions, expert opinions supported by facts, and prior CEQA assessments and planning documents. Therefore, to establish additional context in which to consider the order of magnitude of the project's GHG emissions, this analysis accounts for the following considerations by other government agencies and associations about what levels of GHG emissions constitute a cumulatively considerable incremental contribution to climate change:

- The Sacramento Metropolitan Air Quality Management District (SMAQMD) established thresholds, including 1,100 MT CO₂e per year for the construction phase of land use development projects, and identifies operational measures that should be applied to a project to demonstrate consistency. Furthermore, all projects must implement Tier 1 BMPs to demonstrate consistency with the Climate Change Scoping Plan. After implementation of Tier 1 BMPs, project emissions are compared to the operational land use screening levels table (equivalent to 1,100 MT CO₂e per year) (SMAQMD 2020).
- The Placer County Air Pollution Control District (PCAPCD) recommends a tiered approach to determine if a project's GHG emissions would result in a significant impact. First, project GHG emissions are compared to the de minimis level of 1,100 MT CO₂e per year. If a project does not exceed this threshold, it does not have significant GHG emissions. If the project exceeds the de

³ 14 CCR 15384 provides the following discussion: "Substantial evidence" as used in the Guidelines is the same as the standard of review used by courts in reviewing agency decisions. Some cases suggest that a higher standard, the so called "fair argument standard" applies when a court is reviewing an agency's decision whether or not to prepare an EIR. Public Resources Code section 21082.2 was amended in 1993 (Chapter 1131) to provide that substantial evidence shall include "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The statute further provides that "argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence."

minimis level and does not exceed the 10,000 MT CO₂e per year bright line threshold, then the project's GHG emissions can be compared to the efficiency thresholds. These thresholds are 4.5 MT CO₂e per-capita for residential projects in an urban area, and 5.5 MT CO₂e per-capita for residential projects in a rural area. For nonresidential development, the thresholds are 26.5 MT CO₂e per 1,000 square feet for projects in urban areas, and 27.3 MT CO₂e per 1,000 square feet for projects in rural areas. The PCAPCD bright-line GHG threshold of 10,000 MT CO₂e per year is also applied to land use projects' construction phase and stationary source projects' construction and operational phases. Generally, GHG emissions from a project that exceed 10,000 MT CO₂e per year would be deemed to have a cumulatively considerable contribution to global climate change (PCAPCD 2017).

- The Bay Area Air Quality Management District (BAAQMD) identifies operational measures that should be applied to all projects in order to not have cumulatively considerable GHG emissions. Projects are to comply with either several options which would result in a less than cumulatively considerable contribution and no further action would be required (BAAQMD 2022). Projects must include, at a minimum, no natural gas appliances or natural gas plumbing (in both residential and nonresidential development). Furthermore, transportation related measures would include including electric vehicle charging in compliance with CALGreen Tier 2 and achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15%) or meet a locally adopted Senate Bill (SB) 743 VMT target.
- CAPCOA's 900 MT CO₂e per year threshold was developed to meet the target identified by AB 32 of reducing emissions to 1990 levels by year 2020. Subsequent to CAPCOA identifying the 900 MT CO₂e per year threshold, SB 32 was passed and set a revised statewide reduction target to reduce emissions to 40% below 1990 levels by year 2030. Though the CAPCOA threshold does not consider the reduction targets set by SB 32, the CAPCOA threshold was developed with an aggressive project-level GHG emission capture rate of 90%. Due to the aggressive GHG emission capture rate, the CAPCOA threshold has been determined to be a viable threshold to reduce project GHG emissions and meet SB 32 targets beyond 2020.

As described above, the CO₂e per year screening level threshold is required to implement feasible on-site mitigation measures to reduce their impacts on climate change. Projects that meet or fall below CAPCOA's screening level threshold of 900 MT CO₂e per year of GHG emissions (the strictest applicable threshold) require no further analysis and are not required to implement mitigation measures to reduce GHG emissions. As such, the CAPCOA threshold of 900 MT CO₂e per year is used to assess whether or not the project would have an impact that would be considered peculiar to the project or the site.

Construction Emissions

Construction of the proposed project would result in GHG emissions which are primarily associated with use of off-road construction equipment and on-road vehicles (haul trucks, vendor trucks, and worker vehicles). CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.3. On-site sources of GHG emissions would include off-road equipment and off-site sources including haul trucks, vendor trucks, and worker vehicles.

The estimated GHG emissions from construction was estimated to be approximately 330 MT CO₂e for over the 15-month construction duration. Because neither the NSAQMD nor the Town have established a threshold of significance for construction-related GHG emissions, the significance of the project's GHG construction emissions is not further evaluated. As with project-generated construction criteria air pollutant

emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Therefore, impacts would be less than significant.

Operational Emissions

Operation of the project would generate GHG emissions through landscape maintenance equipment operation; energy use (natural gas and generation of electricity consumed by the project); solid waste disposal; generation of electricity associated with water supply, treatment, distribution and wastewater treatment, and testing of the emergency generator. Notably, because the project is not proposing to increase use at the ski area or increase traffic within the project area, mobile emissions due to the replacement of existing buildings were not quantified. The estimated existing and operational project-generated GHG emissions from area sources, energy usage, solid waste generation, water usage and wastewater generation, and the emergency generator are shown in Table 7. For the proposed project evaluation, the expansion in building area is classified as restaurant space (since CalEEMod does not include a ski lodge use). The restaurant use is a more intense use with higher greenhouse gas emissions. Therefore, the estimates provided in Table 7 are more conservative than the anticipated emissions from the proposed use.

Table 7. Estimated Annual Greenhouse Gas Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	Metric Tons per Year			
Existing Ski Lodge				
Area	<0.01	0.00	0.00	<0.01
Energy	31.52	<0.01	<0.01	31.76
Waste	1.22	0.07	0.00	3.03
Water	0.24	0.01	<0.01	0.53
Total				35.32
Proposed Project				
Area	<0.01	0.00	0.00	<0.01
Energy	141.46	0.01	<0.01	142.47
Waste	4.57	0.27	0.00	11.33
Water	5.49	0.20	<0.01	11.96
Emergency Generator	25.51	<0.01	0.00	25.60
Total				191.36
Net Change in Emissions				
Net Change (Project – Existing)				156.04
<i>GHG Threshold</i>				900
Significant (Yes/No)?				No

Source: Appendix A.

Notes: GHG = greenhouse gas; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent; <0.01 = reported value less than 0.01.

As shown in Table 7, the project would not exceed the applied threshold of 900 MT CO₂e per year during operations. This impact would be **less than significant**.

b) *Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The Town of Truckee is developing a climate action plan in conjunction with the ongoing general plan update, known as the 2040 General Plan. However, this plan has not been adopted and is not applicable to the proposed project. Nevada County has an Energy Action Plan, adopted in 2019. However, this plan does not apply to development within the Town. Therefore, we discuss the project in comparison to state policy plans and goals, below.

Project Consistency with the Scoping Plan

The Scoping Plan (approved by CARB in 2008 and updated in 2014 and 2017, with the 2022 Scoping Plan in effect in 2023) provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects or cities/counties (i.e., the Scoping Plan does not require the City to adopt policies, programs, or regulations to reduce GHG emissions), nor is it intended to be used for project-level evaluations. Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions and new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that would affect a local jurisdiction's emissions inventory from the top down.

The project is required to adhere to the programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of Assembly Bill (AB) 32 and SB 32, and in the future per AB 1279. For example, the project will be required to meet the CALGreen and Building Energy Efficiency Standards in effect at the time when applying for building permits which would help reduce GHG emissions and therefore, help achieve GHG reduction goals. Therefore, implementation of the project would not obstruct implementation of the CARB Scoping Plan.

Project Potential to Conflict with SB 32, AB 1279, and EO S-3-05

EO S-3-05 identified the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. AB 1279 establishes a policy of the state to achieve net zero GHG emissions no later than 2045 and for statewide anthropogenic GHG emissions to be reduced to at least 85% below 1990 levels by 2045.

Each Scoping Plan builds upon the successful framework established by the initial Scoping Plan and subsequent updates, while also identifying new, technologically feasible, and cost-effective strategies to ensure that California meets increasingly stringent GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment

and public health, including in disadvantaged communities. The Scoping Plan updates have continued to express optimism in meeting future year targets of 2050 and 2030, as evaluated in the 2014 and 2017 Scoping Plans (respectively), and most recently, the 2045 goal addressed in the Draft 2022 Scoping Plan under EO B-55-18, which AB 1279 codified and expanded on.

While there are no established protocols or thresholds of significance for that future year analysis, CARB forecasted in the 2014 Scoping Plan that compliance with the current Scoping Plan would put the state on a trajectory of meeting the long-term 2050 GHG goals, although the specific path to compliance was unknown at the time (CARB 2014). The 2017 Scoping Plan outlined a strategy to achieve the 2030 GHG reduction target. The proposed scenario in the draft 2022 Scoping Plan lays out a path not just to carbon neutrality by 2045, but also to the 2030 GHG emissions reduction target (CARB 2022). The modeling indicates that, if the plan described in the proposed scenario is fully implemented, and done so on schedule, the state is on track to reduce its emissions to 260 MMT CO₂e by 2030 (CARB 2022).

The proposed project would not impede the attainment of the GHG reduction goals for 2030, 2045, or 2050 identified in SB 32, AB 1279, and EO S-3-05, respectively. As discussed above, total net project emissions (after subtracting emissions associated with the existing ski lodge) would be a minimal increase of 156 MT CO₂e per year. Therefore, the project’s impact associated with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The General Plan EIR found that an increase in development under the General Plan could result in more hazardous materials being used, stored, transported through, and discarded within Truckee, which would increase the potential risk associated with hazardous materials and waste. The increase in use and transport of hazardous materials would also increase the potential for hazardous materials accidents such as spills. Although accidents involving hazardous materials cannot be completely avoided, the threat of accidents is maintained at a less than significant level by existing federal, State, County and local regulations that direct the production, use, emissions, and transportation of hazardous materials. For example, the transport of hazardous materials by truck and rail is regulated by Caltrans and the California Environmental Protection Agency (Cal EPA) is responsible for implementing federal hazardous materials laws and regulations. Nevada County and the Town of Truckee also have adopted Emergency Operations Plans (EOP) that plan for response to potential hazardous materials incidents in the region. The General Plan EIR determined that by following federally- and State-mandated guidelines for the handling of

hazardous materials, the risk associated with the potential for release of hazardous materials into the environment would be less than significant.

The proposed project would require the transport and use of some hazardous materials for construction and operation, including gasoline and paints. As a result, the proposed project could result in potentially adverse impacts to people and the environment as a result of hazardous materials being accidentally released into the environment. However, the proposed project would be required to operate in compliance with all with applicable federal, State, and local requirements regarding hazardous materials and waste, such as those regulated by Caltrans and Cal EPA. With consideration of the above factors, the project would not result in any peculiar effects and would not result in new or more severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The General Plan EIR determined that compliance with federal, State, and local laws would ensure that hazardous material use, emission and transportation are controlled to a safe level such that risks to schools would be less than significant. The closest school to the proposed project site is Truckee High School, approximately 2.8 miles southeast. The proposed project would not be within 0.25 miles of a school but would comply with all applicable regulations regarding the handling of hazardous materials. Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

According to the General Plan EIR, there are no Superfund or other hazardous materials sites in the Town of Truckee that require action by the Department of Toxic Substances Control (DTSC). As a result, it was determined that there would be a less-than-significant impact associated with hazardous materials sites. A search of the DTSC EnviroStor database shows that there are no cleanup sites near the proposed project site (DTSC 2023). The closest sites are more than 3.0 miles southwest of the project site and would have no effect on the proposed project. Accordingly, the proposed project site would not be located on a hazardous materials site. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The General Plan EIR determined that implementation of the 2025 General Plan would result in development within two miles of the Truckee-Tahoe Airport. As a result, there would be potential impacts related to airports or airstrip safety. However, Goal SAF-6 of the Safety Element would minimize risks associated with operations at the Truckee Tahoe Airport. Safety Policy 6.1 in support of this goal is to maintain land use and development patterns in the vicinity of the airport that are consistent with the adopted Comprehensive Land Use Plan, which includes setbacks and height requirements to protect public safety. Safety Action A6.1, also in support of this goal, is to amend the TMC to reflect revised safety areas

established in the airport's adopted Comprehensive Land Use Plan. As a result of these policies, it was determined that implementation of the General Plan would result in a less-than-significant impact regarding airport hazards.

The proposed project site is located 6.0 miles northwest of the Truckee-Tahoe Airport (the closest airport to the site). The project would not be located within two miles of an airport and is not included within the airport land use compatibility plan (Truckee Tahoe ALUC 2016). Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The General Plan EIR determined that buildout of the 2025 General Plan could result in new development and population growth, which could affect the implementation of adopted emergency response and evacuations plans during disasters. Recognizing the need to plan for adequate emergency response to protect existing and future development, the General Plan Safety Element includes Policies P7.1 and P7.2 that call for identification of appropriate emergency access routes through the Town when I-80 is closed because of weather. Policies also support the Truckee Fire Protection District, Nevada County Office of Emergency Services, and other agencies in their efforts to educate the public about emergency preparedness and response. Altogether, it was determined that proposed General Plan policies would reduce the potential impact to a less-than-significant level.

The proposed project would involve changes to the circulation of the site, such as a new circular shuttle drop-off area on Slalom Way. However, these changes would not impair or interfere with emergency response or evacuation. The proposed project would comply with General Plan policies for identification of appropriate emergency access routes and would be required to submit project plans for review and approval to ensure that emergency access is sufficient at the site. The proposed project would comply with California Fire Code requirements for emergency access which would ensure that the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. No mitigation measures are required and the criteria for requiring further CEQA review are not met.

g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

According to the California Department of Forestry and Fire Protection (CAL FIRE), the Town contains areas within very high fire hazard severity zones (CAL FIRE 2022). The General Plan includes policies for protection from wildland fires. For example, Safety Policy P4.3 calls for promotion of fire hazard reduction through activities such as identifying and implementing opportunities for fuel breaks in very high fire hazard severity zones and ensuring that fire breaks are provided where necessary and appropriate. Safety Policy P4.4 is to require new development to incorporate adequate emergency water flow, emergency vehicle access and evacuation routes. Safety Policy P4.7 is to ensure that the development review process addresses wildland fire risk, including assessment of both construction- and project-related fire risks, particularly in areas of the Town most susceptible to fire hazards. The General Plan EIR determined that compliance with these General Plan policies, which are aimed at minimizing loss of life and property from wildfires, would reduce potential impacts to a less-than-significant level.

The project site itself is not mapped within the very fire hazard severity zone but adjacent areas to the north, west, and south are in the zone within a state responsibility area (SRA). The proposed project is a replacement building that would be constructed consistent with California Fire Code requirements for emergency access and fire prevention and would comply with the aforementioned General Plan policies. Fire hazard reduction would be implemented and the project would incorporate adequate emergency water flow and access in the event of wildland fire emergencies. For these reasons, the proposed project would not result in new or more severe impacts disclosed in the General Plan EIR. No additional analysis is required.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
X. HYDROLOGY AND WATER QUALITY – Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The General Plan EIR found that development under the 2025 General Plan would increase the possibility of additional urban and construction-related runoff which could impact water quality. To minimize the increase of erosion and runoff pollutants, the TMC contains specific requirements related to Best Management Practices (BMPs) and other approaches designed to minimize erosion and runoff during construction and operation of new development or redevelopment. Chapter 18.30 of the code regulates drainage and storm water runoff by requiring preparation of drainage and erosion control plans as part of the building permit application process. The General Plan also includes goals and policies to control general erosion and runoff pollution. Conservation and Open Space Element Goal 11 states that water quality and quantity in creeks, lakes, natural drainages, and groundwater basins should be protected. A number of policies and actions under this goal address erosion control and water quality protection in Truckee’s waterways, such as Conservation and Open Space Policy 11.1, which requires minimizing excessive paving that negatively impacts groundwater recharge rates, and Conservation and Open Space Policy 11.2, which protects surface and groundwater resources from contamination through implementation of BMPs. The General Plan EIR determined that compliance with these requirements and General Plan policies would ensure that impacts to water quality would be less than significant.

During the preliminary geotechnical investigation that was conducted for the proposed project, shallow groundwater was encountered at depths ranging from 6 to 10 feet below ground surface (GEI 2022). If dewatering is required in order to complete construction of subsurface improvements (i.e. foundations and/or utilities), discharge of pumped shallow groundwater could cause erosion or transport of sedimentation that adversely affects receiving waters, unless managed appropriately. Mitigation Measure HYD-1 would require a dewatering plan that would ensure that any dewatering is conducted in a manner that is protective of water quality.

The project site is currently developed with an existing ski lodge. There is an unnamed drainage feature to the east of the current and proposed lodge building and Alder Creek off site to the northwest. The Preliminary Drainage Report addresses pre- and post-project stormwater runoff and stormwater quality, and determined that this feature would not be adversely affected (Auerbach 2022). The Lahontan Regional Water Quality Control Board (LRWQCB), in reviewing the project, determined that as long as existing winter travel paths (ski trails) were not used or maintained during the non-winter period, this feature would not be

impacted. Alder Creek is located off site and greater than 200 feet away from the project and no construction activities are proposed within or near the creek.

The proposed project would involve construction of a new replacement ski lodge which would have a site coverage of 30%. The project would comply with the TMC and General Plan goals and policies to reduce potential impacts on water quality. Furthermore, the proposed project would disturb more than one acre and thus would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. The SWPPP would identify BMPs that are intended to prevent erosion during construction activity to avoid contributing sediment into local waterways. An initial temporary erosion and control plan was also prepared for the project and was submitted to the Town for review. With consideration of the above implementation of MM-HYD-1 would ensure that impacts would be less-than-significant.

MM-HYD-1 Dewatering Plan. Prior to issuance of a building permit, a California licensed Geotechnical Engineer or Engineering Geologist shall prepare and submit a draft Dewatering Contingency Plan for any dewatering activities that may be required during construction activities. The Dewatering Contingency Plan shall prioritize gravity flow techniques prior to use of pumping techniques and include best management practices (BMPs) for the management of any discharge water. The required BMPs shall be consistent with the California Stormwater Quality Association Construction BMP Handbook for Dewatering Activities and include appropriate BMPs such as sediment basins or holding tanks, energy dissipators, and/or sediment traps. No ground disturbance activity shall occur prior to approval of the final Dewatering Contingency Plan by the Town of Truckee and Lahontan Regional Water Quality Control Board.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The General Plan EIR determined that Martis Valley Groundwater Basin, which is the source of water supply for the Town of Truckee, has sufficient water supplies for the General Plan buildout. A sustainable yield of 24,000 acre-feet per year (AFY) would serve the buildout of the General Plan even if no recharge occurred, however since recharge does occur, actual water supplies would be available beyond the 20-year horizon that was evaluated. In addition, the basin is considered by the California Department of Water Resources as a very low priority basin and is not required to comply with the Sustainable Groundwater Management Act (GEI 2022). Even over the 2020 and 2021 water years, which were characterized by relatively dry conditions, average annual pumping was approximately 7,400 AFY, still well below the sustainable yield for the basin (GEI 2022). General Plan policies would also mitigate impacts to groundwater with measures that encourage continued recharge. This includes Conservation and Open Space Policy P11.1, which requires minimizing excessive paving that negatively impacts groundwater recharge rates.

The proposed project would result in a site coverage of 30%, lower than the 40% allowed by the TMC, with completion of the Lot Line Adjustment. With the project site already being developed with an existing ski lodge, development of the proposed project is anticipated to have a negligible effect on groundwater recharge compared to current conditions.

Project construction may require dewatering for completion of below grade construction (e.g., foundations and/or utilities), if shallow groundwater conditions are encountered. According to the Geotechnical

Investigation prepared for the project site, groundwater was encountered at depths of 6 to 10 feet below ground surface. However, any construction dewatering would be temporary and would allow for much of the water to return through infiltration in a drainage channel. The proposed project would also comply with the TMC and relevant General Plan policies, ensuring that the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

i) *Result in substantial erosion or siltation on- or off-site?*

As previously discussed, the Town requires an erosion protection plan for all new building construction and grading activity within the Town limits. Erosion protection plans must depict erosion protection measures to be installed on disturbed areas to prevent sediment from being mobilized and transported into nearby watercourses. The General Plan EIR determined that implementation of General Plan policies in concert with the Town's development standards and requirements would reduce the potential for impacts associated with erosion and siltation to a less-than-significant level.

The project would comply with the TMC and General Plan goals and policies to reduce potential impacts on erosion. The proposed project is also required to prepare and implement a SWPPP in accordance with NPDES Construction General Permit requirements. The SWPPP would identify BMPs that are intended to prevent erosion during construction activity to avoid contributing sediment into local waterways. An initial temporary erosion and control plan was also prepared for the project, depicting erosion protection measures to be installed. The Preliminary Drainage Report also addresses runoff and erosion from the proposed project (Auerbach 2022). With consideration of the above, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?*

The General Plan EIR determined that regulations in the TMC and policies in the General Plan would ensure the effective management of surface runoff. For example, General Plan Safety Element Policy P2.3 requires that storm water drainage systems be incorporated into development projects to effectively control the rate and amount of runoff, preventing increases in downstream flooding potential. Given existing provisions by the Town of Truckee and implementation of the Truckee 2025 General Plan policies and actions, the potential for impacts associated with flooding are reduced to a less-than-significant level.

As previously discussed, a Preliminary Drainage Report was prepared for the proposed project that addresses stormwater runoff from the project (Auerbach 2022). The report determined that post-project runoff would be equal to or less than pre-project condition as analyzed using 10- and 100-year design storm events. The project would also comply with the TMC and policies in the General Plan for the management of surface runoff, decreasing the potential for on- or off-site flooding. Therefore, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

iii) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

See responses under 3.10(c)(i) and 3.10(c)(ii).

iv) *Impede or redirect flood flows?*

The General Plan has several policies and actions that address the reduction of flood hazards in the Truckee area. Safety Element Policy P2.1 states that the Town of Truckee should continue to work with appropriate local, State and federal agencies (particularly FEMA) to maintain the most current flood hazard and floodplain information and use it as a basis for project review and to guide development in accordance with federal, State and local standards. Safety Element Policy P2.4 discourages development within the Truckee River floodplain and adjacent to other waterways to minimize risks associated with flooding. The General Plan EIR determined that compliance with General Plan policies would ensure that development under the General Plan would result in less-than-significant impacts.

As previously discussed, a Preliminary Drainage Report was prepared for the proposed project (Auerbach 2022). The report found that the project would not disturb drainage within the 100-year floodplain. The proposed project would be in compliance with General Plan policies and would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

See response under 3.10(c)(iv) for a discussion of flood hazards. The General Plan EIR determined that the risk of seiches and tsunamis in the Town are low due to relatively low levels of seismic activity locally and the Town's inland location. Therefore, impacts would be less than significant. Accordingly, the proposed project would not result in new or more severe impacts than what was previously disclosed in the General Plan EIR. No additional analysis is required.

e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The General Plan EIR did not analyze General Plan consistency with a water quality control plan or sustainable groundwater management plan. The LRWQCB published a Water Quality Control Plan (Basin Plan) in 1995 that has been amended as recently as September 2021 (LRWQB 2021). The Basin Plan implements a number of state and federal laws, such as the federal Clean Water Act and the State Porter-Cologne Water Quality Control Act. The Northstar Community Services District, Placer County Water Agency, and Truckee Donner Public Utility District published the Martis Valley Groundwater Management Plan in April 2013 (Brown and Caldwell 2013), however the groundwater basin is considered by DWR to be a very low priority basin that is not required to implement a Groundwater Sustainability Plan.

As previously discussed, the proposed project would have less-than-significant impacts on water quality and groundwater management. The project would comply with the TMC and General Plan goals and policies to reduce potential impacts on water quality. The proposed project would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) in accordance with applicable federal and

state requirements, which would identify BMPs to prevent erosion during construction activity to avoid contributing sediment into local waterways. An initial temporary erosion and control plan was prepared for the project and a Preliminary Drainage Report was prepared in December 2022 which addresses pre- and post-project stormwater runoff and stormwater quality planning for the project (Auerbach 2022). As the project site is already developed with an existing ski lodge, development of the proposed project is not anticipated to substantially decrease groundwater supplies or interfere with groundwater recharge to a larger extent than current conditions. Therefore, the project would not interfere with any adopted water quality control plans or sustainable groundwater management plans. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XI. LAND USE AND PLANNING – Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project physically divide an established community?*

The 2025 General Plan set forth a combination of goals, policies, and actions to foster a sense of connectivity in the town and prevent new development from dividing existing uses. These policies were developed in large part to address some of the discontinuous development patterns found in the town that result from what was then a relatively recent incorporation, as well as the physical barriers that divide the community, which include I-80, the Truckee River, and the Railroad. For example, Policy P2.4 in the Circulation Element is to improve connectivity throughout the town's roadway network through roadway improvements, while minimizing environmental, circulation, and residential neighborhood impact. The General Plan EIR determined that compliance with General Plan policies would result in less-than-significant land use impacts associated with the physical division of an established community.

The proposed project consists of replacement of an existing ski lodge. The proposed project would not divide an established community because there are no established communities on site, and access to nearby roads would not be impaired. The project would not change the current uses at the site and would not otherwise divide an established community. Therefore, the proposed project would result in no impact

and would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The 2025 General Plan is the applicable planning document for the project site. The project site is designated as part of the Tahoe Donner Plan Area by the General Plan and is zoned Recreational (REC). The proposed project would be consistent with the land use designation for the project site evaluated in the General Plan EIR. The project design is consistent with the General Plan and Title 18 (Development Code) of the TMC. Therefore, the proposed project would result in no impact and would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XII. MINERAL RESOURCES – Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

According to the General Plan EIR, active mining operations are currently limited to the aggregate mining area in the far southeast part of Truckee. The 2025 General Plan would also seek to reduce incompatibilities between sensitive land uses (e.g. residential developments) and the development of mineral resources, while fostering future development of such resources as an important component of the town's economy. For example, Policy P6.2 requires a restriction on uses permitted on lands mapped as important Mineral Resource Areas within the RC/OS land use designation to those compatible with mineral resource extraction activities. The General Plan EIR determined that compliance with General Plan policies would ensure that impacts to mineral resources would be less than significant.

The proposed project is not located in the southeast part of Truckee where aggregate mining occurs. Therefore, the proposed project would not result in the loss of availability of known mineral resources or mineral resource recovery sites. The proposed project would result in no impact and would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

3.13 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XIII. NOISE – Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The General Plan EIR considered noise impacts related to land use compatibility, transportation (roadway, rail and airport), and determined that such impacts would be less than significant with implementation of General Plan policies. For example, Noise Element Policy P1.3 requires new development to mitigate exterior noise to “normally acceptable” levels in outdoor areas. The General Plan also found that construction noise would be less than significant with implementation of policies, including Noise Element Policy P3.2 which requires that construction activities should be regulated in accordance with the Municipal Noise Ordinance, and Noise Element Policy P3.13 which would require the incorporation of a series of standard noise control measures in construction projects:

- Equip all internal combustion engine driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Locate stationary noise generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.
- Utilize “quiet” air compressors and other stationary noise generating equipment where appropriate technology exists.
- The project sponsor shall designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. The project sponsor shall also post a telephone number for excessive noise complaints in conspicuous locations in the vicinity of the project site. Additionally, the project sponsor shall send a notice to neighbors in the project vicinity with information on the construction schedule and the telephone number for noise complaints

The proposed project is not anticipated to increase roadway noise such that noise-sensitive land uses would be affected. The project is not designed to increase the number of visitors, but to better accommodate the existing operations at the facility. In addition, the project would not significantly increase the number of employees regularly traveling to the site. Operational noise from the project is anticipated to be the same as existing conditions because there would be no changes to land use or activities at the site. Construction noise from the project would be temporary and would comply with Section 18.44.070 of the TMC which regulates the hours during which construction may occur. Non-single-family residential construction are restricted to 7:00 AM to 9:00 PM Monday through Saturday and 9:00 AM to 6:00 PM on Sunday. Therefore, the proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

The General Plan EIR determined that impacts would result if vibration sensitive development, such as residential land uses, are proposed within 100 feet to the railroad tracks. Such development could expose residents to vibration levels in excess of Federal standards. To address this potential impact, the 2025 General Plan includes Policy P1.7 in the Noise Element, which would require site specific analysis of vibration impacts to sensitive uses located in proximity to the railroad, and the identification of site design or construction features to be included that would minimize any potential vibration impacts identified. With this policy in place, impacts from ground-borne vibration would be less than significant.

The proposed project is not located within 100 feet of railroad tracks. Therefore, the proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The project would not include any unusual vibration sources, such as pile-driving. The criteria for requiring further CEQA review are not met.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The General Plan EIR determined that Policy P1.6 in the Noise Element would enforce the noise and land use compatibility criteria and policies adopted in the Truckee-Tahoe Airport Land Use Plan, reducing impacts to a less-than-significant level. As previously discussed, the project would not be located within two miles of an airport and is not included within the airport land use compatibility plan (Truckee Tahoe ALUC 2016). Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XIV. POPULATION AND HOUSING – Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The General Plan EIR determined that since the General Plan includes goals policies to regulate future growth in an orderly and planned manner, there would be no substantial unplanned population growth. For example, Goal LU-1 in the Land Use Element calls for growth to be managed so as to maintain the unique qualities and character of the Town, with new development required to meet important community goals for design, open space, and promotion of a sustainable community (Land Use Element Policy 1.1). Therefore, the General Plan EIR concluded that this impact would not be significant.

The proposed project would involve replacement of the existing ski lodge facility at the site. The project is not designed to increase the number of visitors, but to better accommodate the existing operations at the facility. There would be no substantial increase in employment from the project, and no road extensions or other infrastructure improvements are proposed. Therefore, the project would not result in new or more

severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The General Plan EIR determined that since the majority of development permitted by the General Plan would either occur in infill locations, on undeveloped parcels, or on parcels that can be subdivided (rather than through large scale redevelopment of already developed land and buildings) there would be no impact regarding displacement of people or housing units.

The existing ski lodge does not include any housing or residents. Replacement of the ski lodge would therefore have no impact regarding this criterion. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
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XV. PUBLIC SERVICES – Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

The General Plan would result in new population and residential and commercial development in Truckee, which would increase demand for fire and emergency medical protection services. As a result, additional staff, equipment and facilities would be required to maintain or exceed current response times. Recognizing

that there could be an increased demand for fire and emergency medical response, the 2025 General Plan includes policies and actions to mitigate potential impacts. For example, Policy P4.2 in the Land Use Element states that the Town should cooperate with special districts to plan for and identify suitable future sites for needed facilities, including fire stations, while minimizing potential environmental impacts. As a result of these policies, it was determined that the 2025 General Plan would result in a less than significant impact regarding provision of fire facilities.

The proposed project involves a new ski lodge to replace the existing facility. The project is not designed to increase the number of visitors, but to better accommodate existing operations. Therefore, the service population is not expected to increase. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

Police protection?

Growth allowed under the General Plan would require additional police officers to effectively respond to an anticipated increase in calls. The General Plan includes policies and actions to ensure an adequate level of police service and facilities to serve the town. For example, Policy P4.2 in the Land Use Element states that the Town should cooperate with special districts to plan for and identify suitable future sites for needed facilities, including police services, such that the local population can be served while environmental impacts are minimized. As a result of these policies, it was determined that the General Plan would result in a less than significant impact regarding provision of police facilities.

As previously stated, the project is not designed to increase the number of visitors, but to better accommodate existing operations. Therefore, no additional police protection services would be needed for the project compared to existing conditions. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

Schools?

The General Plan includes policies and actions intended to provide for adequate and well-designed school facilities to meet future demand, including Land Use Policy P4.2 mentioned above. Furthermore, California Government Code Section 65996(a) requires that developer fees be assessed and used to mitigate environmental impacts associated with the construction of new school facilities. As a result, implementation of the General Plan would result in a less than significant impact on the adequate provision of schools.

The proposed project would not result in any population growth and therefore would not contribute to the need for new schools. Nevertheless, the project would pay required school impact fees for a commercial structure, which would support the construction of new school facilities. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

Parks and Other Public Facilities?

The General Plan EIR determined that there would be a less than significant impact regarding parks and other public facilities due to these impact fees and policies in the General Plan.

The proposed project would not result in any population growth and therefore would not contribute to the need for new parks or other public facilities. The project would pay the appropriate development impact fees to the Town, which would support the construction of new parks and public facilities. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact or Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XVI. RECREATION					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

The General Plan EIR determined that there would be a less than significant impact regarding parks and recreational facilities because the General Plan includes policies to ensure that Town parkland goals are met, and existing facilities are not negatively impacted by future growth. For example, Policy P1.1 in the Conservation and Open Space Element requires the acquisition and preservation of open space lands, with priority given for regional and neighborhood parks.

The project itself may be categorized as supporting public recreation – the facility is owned by the Tahoe Donner Association but is open to the general public. The potential impacts related to the replacement of this facility are considered in this Initial Study. In addition, the proposed project would not result in any population growth and therefore would not result in increased use of public parks or other recreational facilities. As previously discussed, the project would pay the appropriate impact fees to the Town, which would support construction and maintenance of parks and recreational facilities. The project would not

result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XVII. TRANSPORTATION - Would the project:					
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

The 2025 General Plan includes a series of goals, policies and actions that are intended to coordinate future development with needed circulation system improvements, and to minimize the potentially significant effects of traffic generated by new development on the roadway network. These include Circulation Element Policy P1.2, which calls for the Town to implement the improvements shown in the General Plan’s Circulation Plan, and Policy P1.3 which would ensure that right-of way for needed improvements is acquired or reserved as part of relevant project approvals. With these policies in place, the General Plan EIR determined that future planned development would not have a significant impact on the circulation system.

The project is designed to better accommodate existing visitor numbers; therefore, no substantial increase in traffic levels is anticipated. The project would include a new circular shuttle drop-off area on Slalom Way but would not involve other changes to the circulation system. LSC Transportation Consultants reviewed site circulation and determined that roadway travel lanes and emergency access pathways would remain unobstructed, as long as roadway parking is cleared of snow and occurs outside of the designated 24-foot

travel way. The project would not involve other changes to transit, bicycle, or pedestrian facilities. Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

b) *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

As of July 1, 2020, CEQA Guidelines section 15064.3(b) states that the recommended metric for the evaluation of transportation impacts will be vehicle miles travelled (VMT). However, per CEQA Guidelines section 15007(c): "If a document meets the content requirements in effect when the document is sent out for public review, the document shall not need to be revised to conform to any new content requirements in Guideline amendments taking effect before the document is finally approved." Therefore, the General Plan Draft EIR, circulated in 2006, complied with the CEQA Guidelines in effect at that time, and was properly certified in 2007. As discussed in Section 1.3 of this Supplemental Checklist, under PRC section 21167.2, once an EIR is certified by the lead agency and the statute of limitations to challenge the EIR has run, the EIR is conclusively presumed valid for all future discretionary actions taken by the lead agency and responsible agencies relating to the project unless the provisions of PRC section 21166 apply. PRC section 21166, in turn, provides that no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs: (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report; (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

In terms of changes to the project, or project circumstances, relative to the General Plan transportation analysis, the project would not be screened out of the Town's VMT thresholds of significance due to its location outside the exemption VMT exemption zone. However, the proposed project is replacing an existing building and only proposes a 9,392 SF increase in size to accommodate the needs of the existing operations. The Town's VMT evaluation is based on summer weekday daily VMT which is not relevant to a downhill ski lodge; for uses that are not active during the summer, an alternative method will be approved by the Town Engineer or his/her designee. The Town's Engineering Division has determined that the proposed project is exempt from further VMT analysis since the project is not designed to increase the number of visitors, but to better accommodate the existing operations at the facility. In addition, the project would not significantly increase the number of employees. Further, the project is intended to primarily serve the members of the homeowners association which is located in close proximity to the project site. Therefore, the project would not result in a new, or substantially greater, VMT impact, as compared to the existing General Plan.

c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Implementation of the proposed 2025 General Plan is not expected to result in significant traffic hazards. In addition, policies and actions in the Circulation Element address the need to minimize hazards that could result from poor roadway design or incompatible land uses. Through the implementation of these policies and actions, the 2025 General Plan would have a less than significant impact with regard to design hazards or incompatible uses.

The project would not introduce incompatible traffic or new road configurations. The project would include a drop-off roundabout that should improve the safety and circulation of vans and buses. Additionally, a review of site circulation determined that roadway travel lanes and emergency access pathways would remain unobstructed as long as roadway parking is cleared of snow and occurs outside of the designated 24-foot travel way. Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

d) *Would the project result in inadequate emergency access?*

The General Plan EIR determined that buildout of the 2025 General Plan could result in new development and population growth, which could affect emergency response during disasters. The General Plan Safety Element includes Policies P7.1 and P7.2 that call for identification of appropriate emergency access routes through the Town when I-80 is closed because of weather. It was determined that proposed General Plan policies would reduce the potential impact to a less-than-significant level.

The proposed project is replacing an existing building and an increased capacity or change in operations is not proposed. The project would not introduce additional traffic or alter existing emergency access routes that could substantially affect emergency access. The proposed project would involve changes to the on-site circulation, including a new circular shuttle drop-off area on Slalom Way. However, these changes would not impair or interfere with emergency access. The proposed project would comply with General Plan policies for identification of appropriate emergency access routes and would be required to submit project plans for review and approval to ensure that emergency access is sufficient at the site. The proposed project would comply with California Fire Code requirements for emergency access which would ensure that the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. No mitigation measures are required and the criteria for requiring further CEQA review are not met.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
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XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

The General Plan EIR did not specifically analyze tribal cultural resources separately from other cultural resources since the document predates the addition of the Tribal Cultural Resources topic to Appendix G of the CEQA Guidelines. However, the EIR found that a buildout of the General Plan would have a potentially significant impact on cultural resources, which can be considered to include tribal cultural resources. As a safeguard, the Town would require proper surveying, testing, research, documentation, monitoring, and safe retrieval of archaeological and cultural resources as part of the development review process (Community Character Policy P19.1). Furthermore, Community Character Policy P19.2 would require an archaeological survey by a qualified professional whenever there is evidence of an archaeological site within a proposed project area, determined to be a high likelihood for occurrence of such sites, or where a project involves substantial site disturbance. These requirements are implemented through Section 18.030.040 of the TMC.

The Town notified California Native American tribes per PRC Section 21080.3.1. Although one tribe initially responded to the notice, requests by the Town for consultation did not receive a response. If any tribal cultural resources are discovered, then proper testing, documentation, monitoring, and retrieval would be required (per TMC Section 18.030.040). Compliance with the General Plan would ensure that the proposed

project’s impacts would not result in new or substantially more severe impacts than identified in the General Plan EIR. The criteria for requiring further CEQA review are not met.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:					
a) Require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

The General Plan EIR determined that additional growth under the 2025 General Plan may require construction or expansion of water, wastewater, or storm water drainage facilities to serve projected demand. However, potential impacts would be addressed by collection of facilities impact fees and compliance with General Plan policies to reduce impacts to less-than-significant levels. For example, Land

Use Element Policy P4.2 directs the Town to cooperate with special districts to identify suitable sites that would accommodate future needed facilities and infrastructure, considering their potential environmental effects. No impacts were identified regarding electric power, natural gas, or telecommunications facilities.

The proposed project would not increase population and would accommodate the same number of visitors as current conditions. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The General Plan EIR determined that sufficient water supplies would be available to serve the Town through the year 2025 and therefore there would be a less than significant impact. Since the proposed project would operate beyond the year 2025, the analysis below incorporated information from the latest Truckee Water System 2020 Urban Water Management Plan (UWMP) (TDPUD 2021).

The Truckee water system uses the Martis Valley Groundwater Basin as its sole source of water supply. According to the 2020 UWMP, inflows to the Martis Valley groundwater basin average about 578,800 acre-feet per year (AFY) while outflows average about 564,300 AFY. Considering the large amount of water in storage in relation to the projected buildout demand, the UWMP determined that 1-5 years of below average precipitation and basin recharge would not have a significant impact on the water supply to serve the area. Additionally, the proposed project is not anticipated to change water demand from current conditions because the land use would remain the same. Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

c) *Would the project result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

As previously discussed, the General Plan EIR determined that buildout of the 2025 General Plan would require construction of or improvements to wastewater treatment facilities to serve projected demand, but impacts would be sufficiently mitigated by collection of facilities impact fees and General Plan policies. The proposed project is not anticipated to change wastewater demand from current conditions because the land use would remain the same and the project would not increase the number of visitors to the site. Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

d) *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The General Plan EIR determined that buildout of the General Plan would increase generation of solid waste but would not result in a significant impact because the Lockwood Regional Landfill has adequate long-

term capacity to serve future growth, and because General Plan policies encourage recycling and waste diversion.

As of 2017, the Lockwood Regional Landfill is projected to be operational until the year 2150 (NDEP 2017). The proposed project is also not anticipated to increase the generation of solid waste from current conditions because the project would not result in population growth nor be intended to accommodate an increase in visitors. The project would continue to comply with applicable management and reduction statutes and regulations related to solid waste. Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Although the 2025 General Plan EIR did not analyze wildfire as a standalone topic (because wildfire was not a topic included in Appendix G of the CEQA Guidelines at the time), the Hazards and Hazardous Materials section of the EIR did include some discussion of wildfire hazards, emergency response, and evacuation, which has been incorporated into the analyses below.

a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The General Plan EIR determined that buildout of the 2025 General Plan could result in new development and population growth, which could affect the implementation of adopted emergency response and evacuation plans. The General Plan Safety Element includes Policies P7.1 and P7.2 that call for identification of appropriate emergency access routes through the town. Policies also support the Truckee Fire Protection District, Nevada County Office of Emergency Services, and other agencies in their efforts to educate the public about emergency preparedness and response. Altogether, it was determined that proposed General Plan policies would reduce the potential impact to a less-than-significant level.

The proposed project would not involve any components that would impair or interfere with emergency response or evacuation. The proposed project would comply with General Plan policies for identification of appropriate emergency access routes and would be required to submit project plans for review and approval to ensure that emergency access is sufficient at the site. The proposed project would comply with California Fire Code requirements for emergency access which would ensure that the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. No mitigation measures are required and the criteria for requiring further CEQA review are not met.

b) *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

According to the CALFIRE, the Town contains areas within very high fire hazard severity zones (CALFIRE 2022). The General Plan includes policies for protection from wildland fires. For example, Safety Policy P4.3 calls for promotion of fire hazard reduction through activities such as identifying and implementing opportunities for fuel breaks in very high fire hazard severity zones and ensuring that fire breaks are provided where necessary and appropriate. Safety Policy P4.4 is to require new development to incorporate adequate emergency water flow, emergency vehicle access and evacuation routes. Safety Policy P4.7 is to ensure that the development review process addresses wildland fire risk, including assessment of both construction, and project-related fire risks, particularly in areas of the Town most susceptible to fire hazards. The General Plan EIR determined that compliance with these General Plan policies, which are aimed at minimizing loss of life and property from wildfires, would reduce potential impacts to a less-than-significant level.

The project site itself is not mapped within the very fire hazard severity zone but adjacent areas to the north, west, and south are in the zone within the State Responsibility Area. The proposed project would be constructed consistent with California Fire Code requirements for emergency access and fire prevention and would comply with the aforementioned General Plan policies. Fire hazard reduction would be implemented and the project would incorporate adequate emergency water flow and access in the event of wildland fire emergencies. The project would also be subject to fire mitigation fees that must be paid to

the prior to construction permit issuance. For these reasons, the proposed project would not result in new or more severe impacts disclosed in the General Plan EIR. No additional analysis is required.

- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

As previously discussed, the General Plan EIR determined that compliance General Plan policies would reduce potential wildfire impacts to a less-than-significant level. The proposed project would not require any installation or maintenance of infrastructure that would exacerbate fire risks. The site is currently developed with a ski lodge that is serviced by publicly maintained roads. The proposed project would be constructed consistent with California Fire Code requirements for emergency access and fire prevention and would comply with the aforementioned General Plan policies. Therefore, the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR. The criteria for requiring further CEQA review are not met.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

As previously discussed in Section 3.10, Hydrology and Water Quality, impacts regarding flooding, drainage, and runoff would be sufficiently mitigated by compliance with the Municipal Code and General Plan policies. The project site is also not susceptible to landslides. The proposed project would not exacerbate fire risks that could result in changes to the severity of these impacts. The project would not result in new or more severe impacts than what was disclosed in the General Plan EIR and the criteria for requiring further CEQA review are not met.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
XXI. MANDATORY FINDINGS OF SIGNIFICANCE					
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact or No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?***

As discussed in Section 3.4, Biological Resources, the proposed project may have the potential to affect nesting birds, but this impact would be mitigated to a less-than-significant level assuming compliance with MM-BIO-1. For all other biological resources and cultural resources related topics, it has been determined that the proposed project would not result in new or substantially more severe impacts than identified in the General Plan EIR. The General Plan EIR found that compliance with General Plan policies, the TMC, and applicable regulations would ensure that buildout of the 2025 General Plan would not substantially degrade the quality of the environment, substantially reduce the habitat of a wildlife species, or eliminate important examples of the major periods of California history or prehistory.

b) ***Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)***

The proposed project may incrementally contribute to cumulative impacts in combination with other projects occurring within the Town. However, the analysis provided throughout this IS/MND demonstrates that the project’s contribution to any existing cumulative impacts would be reduced to less-than-significant levels through mitigation (for example, impacts regarding criteria air pollutants). Further, the project is a replacement project intended to meet the needs of the current operations of the existing ski hill and would not contribute to these cumulative impacts. For those topics that have been adequately addressed by the

2025 General Plan EIR, no further CEQA review is required since the General Plan EIR incorporated cumulative effects into the impact analysis.

c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

As provided in the previous analysis for each resource area, the project would not cause any substantial adverse effects on human beings that are not addressed by proposed mitigation measures, or existing General Plan policies and compliance with existing regulations (such as statewide airborne toxic control measures, air district requirements, county health regulations, and the TMC). Impacts related to air quality, biological resources, and hydrology would be reduced to less-than-significant levels by proposed mitigation measures, while all other topics have either been adequately addressed by the 2025 General Plan EIR and/or would not require mitigation to reduce adverse effects to less-than-significant levels.

4 References and Preparers

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4.2 List of Preparers

Dudek

Brian Grattidge, Project Manager
Jessica Baldrige, Biologist
Angelica Chiu, Analyst
Ian McIntire, Air Quality

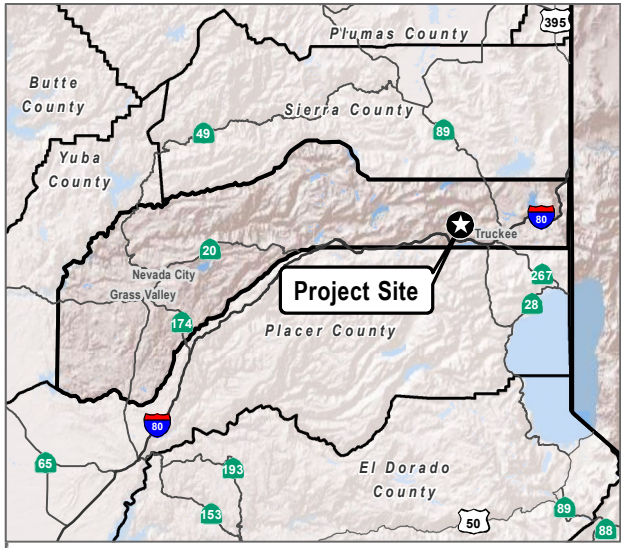
Town of Truckee

Yumie Dahn, Project Planner

4.3 Agencies Consulted

County of Nevada Environmental Health Department
Lahontan Regional Water Quality Control Board
Town of Truckee Engineering Division
Town of Truckee Solid Waste Division
Truckee Donner Public Utility District
Truckee Fire Protection District
Truckee Sanitary District

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Project Boundary

SOURCE: Nevada County; Open Stree Map; Bing Maps

FIGURE 1
Project Location
Tahoe Donner Ski Lodge

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SOURCE: Bull Stockwell Allen Architecture/Planning/Interiors 2022; Nevada County; Open Stree Map; Bing Maps



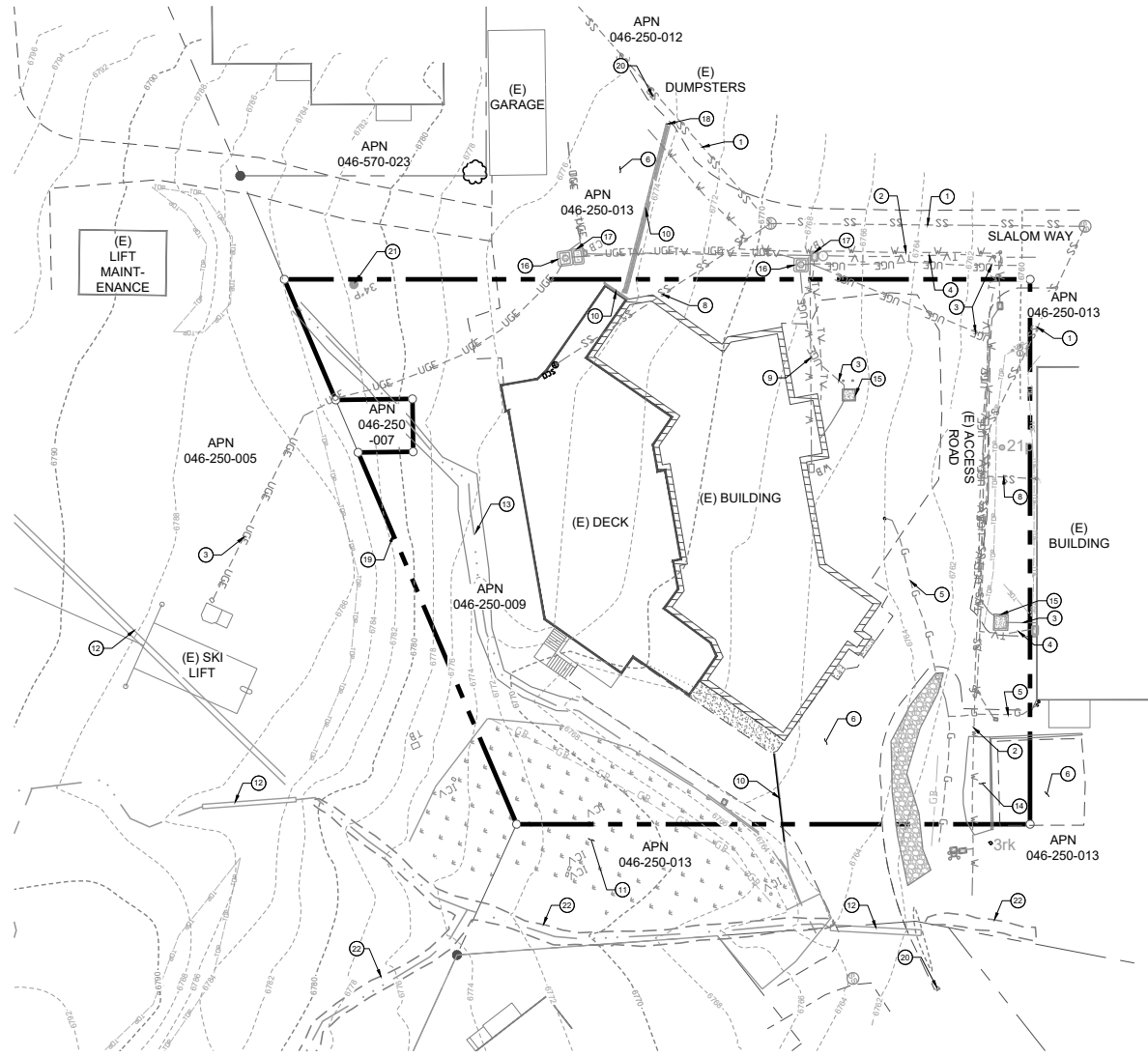
FIGURE 2
Project Site
Tahoe Donner Ski Lodge

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LEGEND

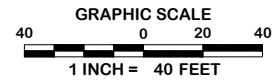
EXISTING

- AC PAVING
- EDGE OF PAVEMENT
- PROPERTY LINE
- ADJACENT PROPERTY LINE
- SETBACK
- CENTERLINE OF DRIVE
- ROAD CENTERLINE
- SNOW STORAGE OR DRAINAGE EASEMENT
- MULTI-PURPOSE EASEMENT
- DRIVEWAY AND PUBLIC UTILITY EASEMENT
- OVERHEAD ELECTRIC
- UNDERGROUND UTILITY
- OVERHEAD UTILITY
- GAS LINE
- WATER LINE
- SEWER LINE
- STORM DRAIN CULVERT
- JOINT UTILITY POLE
- SANITARY SEWER MANHOLE
- ELECTRIC BOX
- TELEVISION BOX
- WATER METER
- WATER VALVE
- IRRIGATION VALVE
- SIGN
- OR
- TREE (SIZE VARIES)
- INDEX CONTOUR W/ ELEV
- INTERMEDIATE CONTOUR
- GRADE BREAK
- FLOWLINE
- ROCK OR BOULDER
- TREE (SIZE & TYPE VARIES)
- BENCHMARK
- VEGETATION



EXISTING SITE PLAN KEYNOTES

1. (E) SEWER LINE
2. (E) WATER LINE
3. (E) ELECTRICAL LINE
4. (E) COMMUNICATIONS LINE
5. (E) GAS LINE
6. (E) ASPHALT
7. NOT USED
8. (E) SEWER LATERAL
9. (E) WATER LATERAL
10. (E) SLOTTED DRAIN
11. (E) VEGETATION
12. (E) CULVERT
13. (E) DRAINAGE DITCH
14. (E) PLANTER BOX
15. (E) TRANSFORMER
16. (E) ELECTRIC VAULT
17. (E) COMMUNICATION BOX
18. (E) SLOTTED DRAIN OUTLET UNKNOWN
19. EXISTING LOT LINE TO BE REMOVED, PENDING FUTURE LLA APPLICATION APPROVAL
- (E) PARCELS 046-250-005, 046-250-007, AND 046-250-009 TO BE MERGED
20. (E) FIRE HYDRANT LOCATIONS
21. (E) 34" PINE TO REMAIN
22. (E) OFF-SITE AQUATIC RESOURCE - WETLAND SWALE TO BE PROTECTED AND AVOIDED, AND LIMITS OF 100 YEAR FLOOD PLAIN DELINEATION (SEE DRAINAGE REPORT)



SOURCE: Auerbach Engineering Corp; Bull Stockwell Allen Architecture/Planning/Interiors, 2022

FIGURE 3
Existing Site Plan
Tahoe Donner Ski Lodge

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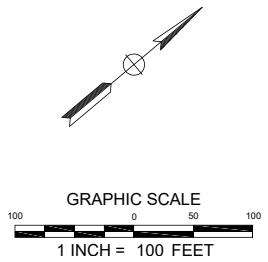


LEGEND:

- SHUTTLE ROUTE #1
- SHUTTLE ROUTE #2
- ROUTE DIRECTION
- PEDESTRIAN PATH OF TRAVEL
- EXIST. STREET PARKING
- EXIST. PARKING LOTS
- ADA PARKING AREAS

TOTAL PARKING COUNT:

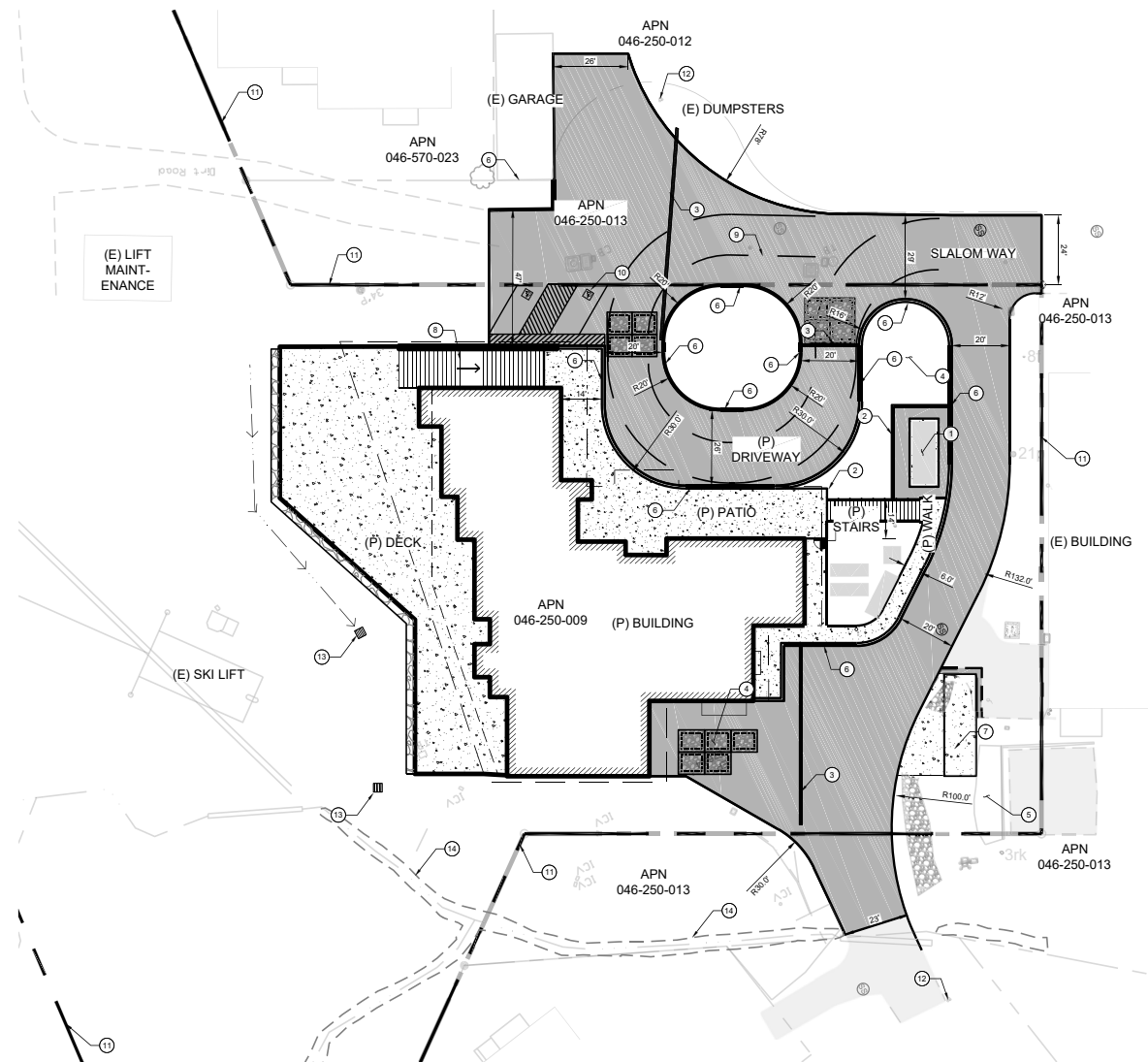
	Std. Stalls	ADA Stalls
Lot 1	50	
Lot 2	39	
Lot 3	34	
Lot 4	60	1
Lot 5	49	6
Street parking	85	
TD Ski Lodge		2
TOTAL	317	9



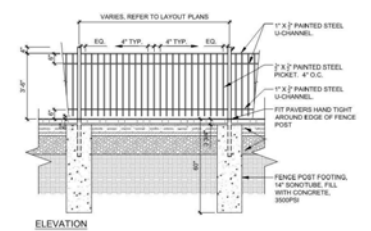
SOURCE: Auerbach Engineering Corp; Bull Stockwell Allen Architecture/Planning/Interiors, 2022

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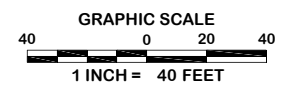
LEGEND	
PROPOSED	
	AC PAVING
	PAVERS
	INFILTRATION TRENCH
	ROCK SLOPE PROTECTION
	CONCRETE PAD
	EDGE OF PAVEMENT
	EDGE OF SHOULDER/ CURB
	SANITARY SEWER
	WATERLINE
	NATURAL GAS LINE
	CABLE TV
	JOINT TRENCH
	UNDERGROUND ELEC
	STORM DRAIN
	TRENCH DRAIN
	GRADING LIMITS - FILL
	GRADING LIMITS - CUT
	GRADE BREAK
	SEWER CLEANOUT
	WATER METER
	WATER VALVE
	GAS REGULATOR ASSEMBLY
	STORM DRAIN MANHOLE
	INDEX CONTOUR W/ ELEV
	INTERMEDIATE CONTOUR



- # SITE PLAN KEYNOTES**
- (P) GENERATOR
 - (P) RETAINING WALL (5' MAX HEIGHT. SEE GRADING PLAN) WITH RAILING. SEE DETAIL BELOW.
 - (P) TRENCH DRAIN
 - (P) INFILTRATION CHAMBER(S)
 - (E) PLANTER
 - (P) CURB
 - (P) TRASH ENCLOSURE. SEE ARCHITECTURAL PLAN
 - (P) STAIRWAY LEVEL 2 TO LEVEL 3
 - FIRE TRUCK TURNING MOVEMENT
 - ADA PARKING
 - PENDING FUTURE LLA APPLICATION APPROVAL - (E) PARCELS 046-250-005, 046-250-007, AND 046-250-009 TO BE MERGED
 - (E) FIRE HYDRANT LOCATION(S)
 - (P) DROP INLET. SEE GRADING PLAN
 - (E) OFF-SITE AQUATIC RESOURCE - WETLAND SWALE TO BE PROTECTED AND AVOIDED, AND LIMITS OF 100 YEAR FLOOD PLAN DELINEATION (SEE DRAINAGE REPORT)



RETAINING WALL w/ RAILING DETAIL



SOURCE: Auerbach Engineering Corp; Bull Stockwell Allen Architecture/Planning/Interiors, 2022

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SOURCE: Auerbach Engineering Corp; Bull Stockwell Allen Architecture/Planning/Interiors, 2022

FIGURE 6
Proposed Elevation - West (Street) Side
Tahoe Donner Ski Lodge

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SOURCE: Auerbach Engineering Corp; Bull Stockwell Allen Architecture/Planning/Interiors, 2022

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Appendix A

Air Quality Calculations

TAHOE DONNER DOWNHILL SKI LODGE - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

TAHOE DONNER DOWNHILL SKI LODGE

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	10.13	1000sqft	0.00	10,130.00	0
Quality Restaurant	14.37	1000sqft	1.30	14,370.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	72
Climate Zone	1			Operational Year	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MW hr)	203.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - TAHOE DONNER DOWNHILL SKI LODGE . NSAQMD.

Land Use - Project includes 24,490 sf ski area day lodge. Acres of disturbance would be approx 1.3 acres.

Construction Phase - Construction would begin May 2023, updated default phasing to meet 15-month duration. No paving activities are assumed.

Off-road Equipment - Default equipment.

Off-road Equipment - Default equipment.

Off-road Equipment - Default equipment.

Off-road Equipment - Default equipment.

Off-road Equipment - Default equipment.

Off-road Equipment - Default equipment.

Trips and VMT - Default trips assumed. Added two vendor trips per day for water trucks.

Demolition - Demolish existing 15,838 sf downhill ski lodge.

TAHOE DONNER DOWNHILL SKI LODGE - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Grading - 3,897 cy of soil exported.

Architectural Coating - Default rates assumed.

Vehicle Trips - No mobile trips assumed.

Energy Use - Default rates assumed.

Water And Wastewater - Default rates assumed.

Solid Waste - Default rates assumed.

Stationary Sources - Emergency Generators and Fire Pumps - Installation of a 1,340.5 HP generastor (1,000 KVA).

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	2.00	5.00
tblConstructionPhase	NumDays	4.00	5.00
tblConstructionPhase	NumDays	200.00	285.00
tblConstructionPhase	NumDays	10.00	15.00
tblGrading	AcresOfGrading	5.00	4.00
tblGrading	AcresOfGrading	4.69	1.88
tblGrading	MaterialExported	0.00	3,897.00
tblLandUse	LotAcreage	0.23	0.00
tblLandUse	LotAcreage	0.33	1.30
tblStationaryGeneratorsPumpsUse	HorsePowerValue	600.00	1,340.50
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00
tblTripsAndVMT	VendorTripNumber	0.00	2.00
tblVehicleTrips	ST_TR	2.21	0.00
tblVehicleTrips	ST_TR	90.04	0.00
tblVehicleTrips	SU_TR	0.70	0.00
tblVehicleTrips	SU_TR	71.97	0.00
tblVehicleTrips	WD_TR	9.74	0.00
tblVehicleTrips	WD_TR	83.84	0.00

2.0 Emissions Summary

TAHOE DONNER DOWNHILL SKI LODGE - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1360	1.1195	1.1279	2.2300e-003	0.0525	0.0474	0.0999	0.0207	0.0454	0.0660	0.0000	188.8549	188.8549	0.0308	3.6500e-003	190.7105
2024	0.3876	0.8003	0.9135	1.6700e-003	6.9000e-003	0.0321	0.0390	1.8800e-003	0.0310	0.0329	0.0000	138.8370	138.8370	0.0215	9.6000e-004	139.6605
Maximum	0.3876	1.1195	1.1279	2.2300e-003	0.0525	0.0474	0.0999	0.0207	0.0454	0.0660	0.0000	188.8549	188.8549	0.0308	3.6500e-003	190.7105

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1360	1.1195	1.1279	2.2300e-003	0.0525	0.0474	0.0999	0.0207	0.0454	0.0660	0.0000	188.8548	188.8548	0.0308	3.6500e-003	190.7103
2024	0.3876	0.8003	0.9135	1.6700e-003	6.9000e-003	0.0321	0.0390	1.8800e-003	0.0310	0.0329	0.0000	138.8369	138.8369	0.0215	9.6000e-004	139.6603
Maximum	0.3876	1.1195	1.1279	2.2300e-003	0.0525	0.0474	0.0999	0.0207	0.0454	0.0660	0.0000	188.8548	188.8548	0.0308	3.6500e-003	190.7103

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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TAHOE DONNER DOWNHILL SKI LODGE - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)				Maximum Mitigated ROG + NOX (tons/quarter)									
1	5-1-2023	7-31-2023	0.5124				0.5124									
2	8-1-2023	10-31-2023	0.4442				0.4442									
3	11-1-2023	1-31-2024	0.4362				0.4362									
4	2-1-2024	4-30-2024	0.4103				0.4103									
5	5-1-2024	7-31-2024	0.5989				0.5989									
6	8-1-2024	9-30-2024	0.0280				0.0280									
		Highest	0.5989				0.5989									

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1241	0.0000	2.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	4.4000e-004	4.4000e-004	0.0000	0.0000	4.7000e-004
Energy	0.0100	0.0913	0.0767	5.5000e-004		6.9400e-003	6.9400e-003		6.9400e-003	6.9400e-003	0.0000	141.4600	141.4600	8.7200e-003	2.6500e-003	142.4668
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Stationary	0.0550	0.2459	0.1402	2.6000e-004		8.0900e-003	8.0900e-003		8.0900e-003	8.0900e-003	0.0000	25.5134	25.5134	3.5800e-003	0.0000	25.6028
Waste						0.0000	0.0000		0.0000	0.0000	4.5734	0.0000	4.5734	0.2703	0.0000	11.3304
Water						0.0000	0.0000		0.0000	0.0000	1.9550	3.5326	5.4876	0.2014	4.8100e-003	11.9553
Total	0.1891	0.3371	0.2171	8.1000e-004	0.0000	0.0150	0.0150	0.0000	0.0150	0.0150	6.5284	170.5064	177.0348	0.4840	7.4600e-003	191.3557

TAHOE DONNER DOWNHILL SKI LODGE - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1241	0.0000	2.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	4.4000e-004	4.4000e-004	0.0000	0.0000	4.7000e-004
Energy	0.0100	0.0913	0.0767	5.5000e-004		6.9400e-003	6.9400e-003		6.9400e-003	6.9400e-003	0.0000	141.4600	141.4600	8.7200e-003	2.6500e-003	142.4668
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Stationary	0.0550	0.2459	0.1402	2.6000e-004		8.0900e-003	8.0900e-003		8.0900e-003	8.0900e-003	0.0000	25.5134	25.5134	3.5800e-003	0.0000	25.6028
Waste						0.0000	0.0000		0.0000	0.0000	4.5734	0.0000	4.5734	0.2703	0.0000	11.3304
Water						0.0000	0.0000		0.0000	0.0000	1.9550	3.5326	5.4876	0.2014	4.8100e-003	11.9553
Total	0.1891	0.3371	0.2171	8.1000e-004	0.0000	0.0150	0.0150	0.0000	0.0150	0.0150	6.5284	170.5064	177.0348	0.4840	7.4600e-003	191.3557

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	5/1/2023	5/26/2023	5	20	
2	Site Preparation	Site Preparation	5/27/2023	6/2/2023	5	5	
3	Grading	Grading	6/3/2023	6/9/2023	5	5	

TAHOE DONNER DOWNHILL SKI LODGE - Northern Sierra AQMD Air District, Annual

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4	Building Construction	Building Construction	6/10/2023	7/12/2024	5	285
5	Architectural Coating	Architectural Coating	7/13/2024	8/2/2024	5	15

Acres of Grading (Site Preparation Phase): 1.88

Acres of Grading (Grading Phase): 4

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 36,750; Non-Residential Outdoor: 12,250; Striped Parking Area: 0 (Architectural

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
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Demolition	5	13.00	0.00	72.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	2.00	487.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	9.00	4.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	2.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.8000e-003	0.0000	7.8000e-003	1.1800e-003	0.0000	1.1800e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0147	0.1432	0.1346	2.4000e-004		6.7700e-003	6.7700e-003		6.3300e-003	6.3300e-003	0.0000	21.0866	21.0866	5.3500e-003	0.0000	21.2202
Total	0.0147	0.1432	0.1346	2.4000e-004	7.8000e-003	6.7700e-003	0.0146	1.1800e-003	6.3300e-003	7.5100e-003	0.0000	21.0866	21.0866	5.3500e-003	0.0000	21.2202

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.0000e-004	5.3400e-003	1.1900e-003	2.0000e-005	6.1000e-004	5.0000e-005	6.5000e-004	1.7000e-004	4.0000e-005	2.1000e-004	0.0000	2.1004	2.1004	2.0000e-005	3.3000e-004	2.1993

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Worker	5.3000e-004	4.0000e-004	4.1000e-003	1.0000e-005	1.0200e-003	1.0000e-005	1.0300e-003	2.7000e-004	1.0000e-005	2.8000e-004	0.0000	0.8651	0.8651	4.0000e-005	3.0000e-005	0.8752
Total	6.3000e-004	5.7400e-003	5.2900e-003	3.0000e-005	1.6300e-003	6.0000e-005	1.6800e-003	4.4000e-004	5.0000e-005	4.9000e-004	0.0000	2.9655	2.9655	6.0000e-005	3.6000e-004	3.0745

3.3 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0142	0.0000	0.0142	7.3500e-003	0.0000	7.3500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.8300e-003	0.0311	0.0166	4.0000e-005		1.2700e-003	1.2700e-003		1.1700e-003	1.1700e-003	0.0000	3.7786	3.7786	1.2200e-003	0.0000	3.8091
Total	2.8300e-003	0.0311	0.0166	4.0000e-005	0.0142	1.2700e-003	0.0154	7.3500e-003	1.1700e-003	8.5200e-003	0.0000	3.7786	3.7786	1.2200e-003	0.0000	3.8091

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.0000e-005	6.0000e-005	6.3000e-004	0.0000	1.6000e-004	0.0000	1.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1331	0.1331	1.0000e-005	0.0000	0.1347

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Total	8.0000e-005	6.0000e-005	6.3000e-004	0.0000	1.6000e-004	0.0000	1.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1331	0.1331	1.0000e-005	0.0000	0.1347
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Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0142	0.0000	0.0142	7.3500e-003	0.0000	7.3500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.8300e-003	0.0311	0.0166	4.0000e-005		1.2700e-003	1.2700e-003		1.1700e-003	1.1700e-003	0.0000	3.7786	3.7786	1.2200e-003	0.0000	3.8091
Total	2.8300e-003	0.0311	0.0166	4.0000e-005	0.0142	1.2700e-003	0.0154	7.3500e-003	1.1700e-003	8.5200e-003	0.0000	3.7786	3.7786	1.2200e-003	0.0000	3.8091

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.0000e-005	6.0000e-005	6.3000e-004	0.0000	1.6000e-004	0.0000	1.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1331	0.1331	1.0000e-005	0.0000	0.1347
Total	8.0000e-005	6.0000e-005	6.3000e-004	0.0000	1.6000e-004	0.0000	1.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1331	0.1331	1.0000e-005	0.0000	0.1347

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3.4 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0174	0.0000	0.0174	8.5400e-003	0.0000	8.5400e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.3300e-003	0.0362	0.0218	5.0000e-005		1.5100e-003	1.5100e-003		1.3900e-003	1.3900e-003	0.0000	4.5260	4.5260	1.4600e-003	0.0000	4.5626
Total	3.3300e-003	0.0362	0.0218	5.0000e-005	0.0174	1.5100e-003	0.0189	8.5400e-003	1.3900e-003	9.9300e-003	0.0000	4.5260	4.5260	1.4600e-003	0.0000	4.5626

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.6000e-004	0.0361	8.0200e-003	1.5000e-004	4.1000e-003	3.1000e-004	4.4200e-003	1.1300e-003	3.0000e-004	1.4300e-003	0.0000	14.2068	14.2068	1.0000e-004	2.2400e-003	14.8760
Vendor	1.0000e-005	2.7000e-004	9.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.1015	0.1015	0.0000	1.0000e-005	0.1060
Worker	1.0000e-004	8.0000e-005	7.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1664	0.1664	1.0000e-005	1.0000e-005	0.1683
Total	7.7000e-004	0.0365	8.9000e-003	1.5000e-004	4.3300e-003	3.1000e-004	4.6500e-003	1.1900e-003	3.0000e-004	1.4900e-003	0.0000	14.4747	14.4747	1.1000e-004	2.2600e-003	15.1503

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Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0174	0.0000	0.0174	8.5400e-003	0.0000	8.5400e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.3300e-003	0.0362	0.0218	5.0000e-005		1.5100e-003	1.5100e-003		1.3900e-003	1.3900e-003	0.0000	4.5260	4.5260	1.4600e-003	0.0000	4.5626
Total	3.3300e-003	0.0362	0.0218	5.0000e-005	0.0174	1.5100e-003	0.0189	8.5400e-003	1.3900e-003	9.9300e-003	0.0000	4.5260	4.5260	1.4600e-003	0.0000	4.5626

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.6000e-004	0.0361	8.0200e-003	1.5000e-004	4.1000e-003	3.1000e-004	4.4200e-003	1.1300e-003	3.0000e-004	1.4300e-003	0.0000	14.2068	14.2068	1.0000e-004	2.2400e-003	14.8760
Vendor	1.0000e-005	2.7000e-004	9.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.1015	0.1015	0.0000	1.0000e-005	0.1060
Worker	1.0000e-004	8.0000e-005	7.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1664	0.1664	1.0000e-005	1.0000e-005	0.1683
Total	7.7000e-004	0.0365	8.9000e-003	1.5000e-004	4.3300e-003	3.1000e-004	4.6500e-003	1.1900e-003	3.0000e-004	1.4900e-003	0.0000	14.4747	14.4747	1.1000e-004	2.2600e-003	15.1503

3.5 Building Construction - 2023

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Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1104	0.8490	0.9143	1.6000e-003		0.0373	0.0373		0.0360	0.0360	0.0000	131.6594	131.6594	0.0224	0.0000	132.2183
Total	0.1104	0.8490	0.9143	1.6000e-003		0.0373	0.0373		0.0360	0.0360	0.0000	131.6594	131.6594	0.0224	0.0000	132.2183

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.0000e-004	0.0158	5.2900e-003	6.0000e-005	1.9000e-003	1.0000e-004	2.0000e-003	5.5000e-004	9.0000e-005	6.4000e-004	0.0000	5.8888	5.8888	4.0000e-005	8.7000e-004	6.1480
Worker	2.6800e-003	1.9800e-003	0.0206	5.0000e-005	5.1300e-003	3.0000e-005	5.1600e-003	1.3700e-003	3.0000e-005	1.4000e-003	0.0000	4.3423	4.3423	1.8000e-004	1.5000e-004	4.3928
Total	3.1800e-003	0.0178	0.0259	1.1000e-004	7.0300e-003	1.3000e-004	7.1600e-003	1.9200e-003	1.2000e-004	2.0400e-003	0.0000	10.2311	10.2311	2.2000e-004	1.0200e-003	10.5409

Mitigated Construction On-Site

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1104	0.8490	0.9143	1.6000e-003		0.0373	0.0373		0.0360	0.0360	0.0000	131.6592	131.6592	0.0224	0.0000	132.2181
Total	0.1104	0.8490	0.9143	1.6000e-003		0.0373	0.0373		0.0360	0.0360	0.0000	131.6592	131.6592	0.0224	0.0000	132.2181

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.0000e-004	0.0158	5.2900e-003	6.0000e-005	1.9000e-003	1.0000e-004	2.0000e-003	5.5000e-004	9.0000e-005	6.4000e-004	0.0000	5.8888	5.8888	4.0000e-005	8.7000e-004	6.1480
Worker	2.6800e-003	1.9800e-003	0.0206	5.0000e-005	5.1300e-003	3.0000e-005	5.1600e-003	1.3700e-003	3.0000e-005	1.4000e-003	0.0000	4.3423	4.3423	1.8000e-004	1.5000e-004	4.3928
Total	3.1800e-003	0.0178	0.0259	1.1000e-004	7.0300e-003	1.3000e-004	7.1600e-003	1.9200e-003	1.2000e-004	2.0400e-003	0.0000	10.2311	10.2311	2.2000e-004	1.0200e-003	10.5409

3.5 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

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Off-Road	0.0994	0.7745	0.8762	1.5400e-003		0.0315	0.0315		0.0304	0.0304	0.0000	127.1279	127.1279	0.0212	0.0000	127.6572
Total	0.0994	0.7745	0.8762	1.5400e-003		0.0315	0.0315		0.0304	0.0304	0.0000	127.1279	127.1279	0.0212	0.0000	127.6572

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.6000e-004	0.0150	4.9800e-003	6.0000e-005	1.8300e-003	9.0000e-005	1.9200e-003	5.3000e-004	9.0000e-005	6.2000e-004	0.0000	5.5969	5.5969	4.0000e-005	8.2000e-004	5.8422
Worker	2.4300e-003	1.7100e-003	0.0183	4.0000e-005	4.9500e-003	3.0000e-005	4.9800e-003	1.3200e-003	3.0000e-005	1.3500e-003	0.0000	4.0997	4.0997	1.6000e-004	1.4000e-004	4.1448
Total	2.8900e-003	0.0167	0.0233	1.0000e-004	6.7800e-003	1.2000e-004	6.9000e-003	1.8500e-003	1.2000e-004	1.9700e-003	0.0000	9.6966	9.6966	2.0000e-004	9.6000e-004	9.9870

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0994	0.7745	0.8762	1.5400e-003		0.0315	0.0315		0.0304	0.0304	0.0000	127.1277	127.1277	0.0212	0.0000	127.6570
Total	0.0994	0.7745	0.8762	1.5400e-003		0.0315	0.0315		0.0304	0.0304	0.0000	127.1277	127.1277	0.0212	0.0000	127.6570

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.6000e-004	0.0150	4.9800e-003	6.0000e-005	1.8300e-003	9.0000e-005	1.9200e-003	5.3000e-004	9.0000e-005	6.2000e-004	0.0000	5.5969	5.5969	4.0000e-005	8.2000e-004	5.8422
Worker	2.4300e-003	1.7100e-003	0.0183	4.0000e-005	4.9500e-003	3.0000e-005	4.9800e-003	1.3200e-003	3.0000e-005	1.3500e-003	0.0000	4.0997	4.0997	1.6000e-004	1.4000e-004	4.1448
Total	2.8900e-003	0.0167	0.0233	1.0000e-004	6.7800e-003	1.2000e-004	6.9000e-003	1.8500e-003	1.2000e-004	1.9700e-003	0.0000	9.6966	9.6966	2.0000e-004	9.6000e-004	9.9870

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2839					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.3600e-003	9.1400e-003	0.0136	2.0000e-005		4.6000e-004	4.6000e-004		4.6000e-004	4.6000e-004	0.0000	1.9149	1.9149	1.1000e-004	0.0000	1.9176
Total	0.2853	9.1400e-003	0.0136	2.0000e-005		4.6000e-004	4.6000e-004		4.6000e-004	4.6000e-004	0.0000	1.9149	1.9149	1.1000e-004	0.0000	1.9176

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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	4.0000e-005	4.4000e-004	0.0000	1.2000e-004	0.0000	1.2000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0976	0.0976	0.0000	0.0000	0.0987
Total	6.0000e-005	4.0000e-005	4.4000e-004	0.0000	1.2000e-004	0.0000	1.2000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0976	0.0976	0.0000	0.0000	0.0987

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2839					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.3600e-003	9.1400e-003	0.0136	2.0000e-005		4.6000e-004	4.6000e-004		4.6000e-004	4.6000e-004	0.0000	1.9149	1.9149	1.1000e-004	0.0000	1.9176
Total	0.2853	9.1400e-003	0.0136	2.0000e-005		4.6000e-004	4.6000e-004		4.6000e-004	4.6000e-004	0.0000	1.9149	1.9149	1.1000e-004	0.0000	1.9176

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4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	0.00	0.00	0.00		
Quality Restaurant	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	77	19	4
Quality Restaurant	9.50	7.30	7.30	12.00	69.00	19.00	38	18	44

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.409222	0.065190	0.239572	0.158512	0.048862	0.009354	0.007811	0.013699	0.000835	0.000178	0.039537	0.000645	0.006583
Quality Restaurant	0.409222	0.065190	0.239572	0.158512	0.048862	0.009354	0.007811	0.013699	0.000835	0.000178	0.039537	0.000645	0.006583

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	42.1057	42.1057	6.8100e-003	8.3000e-004	42.5221

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	42.1057	42.1057	6.8100e-003	8.3000e-004	42.5221
NaturalGas Mitigated	0.0100	0.0913	0.0767	5.5000e-004		6.9400e-003	6.9400e-003		6.9400e-003	6.9400e-003	0.0000	99.3543	99.3543	1.9000e-003	1.8200e-003	99.9447
NaturalGas Unmitigated	0.0100	0.0913	0.0767	5.5000e-004		6.9400e-003	6.9400e-003		6.9400e-003	6.9400e-003	0.0000	99.3543	99.3543	1.9000e-003	1.8200e-003	99.9447

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	195914	1.0600e-003	9.6000e-003	8.0700e-003	6.0000e-005		7.3000e-004	7.3000e-004		7.3000e-004	7.3000e-004	0.0000	10.4547	10.4547	2.0000e-004	1.9000e-004	10.5169
Quality Restaurant	1.66591e+006	8.9800e-003	0.0817	0.0686	4.9000e-004		6.2100e-003	6.2100e-003		6.2100e-003	6.2100e-003	0.0000	88.8995	88.8995	1.7000e-003	1.6300e-003	89.4278
Total		0.0100	0.0913	0.0767	5.5000e-004		6.9400e-003	6.9400e-003		6.9400e-003	6.9400e-003	0.0000	99.3543	99.3543	1.9000e-003	1.8200e-003	99.9447

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	195914	1.0600e-003	9.6000e-003	8.0700e-003	6.0000e-005		7.3000e-004	7.3000e-004		7.3000e-004	7.3000e-004	0.0000	10.4547	10.4547	2.0000e-004	1.9000e-004	10.5169
Quality Restaurant	1.66591e+006	8.9800e-003	0.0817	0.0686	4.9000e-004		6.2100e-003	6.2100e-003		6.2100e-003	6.2100e-003	0.0000	88.8995	88.8995	1.7000e-003	1.6300e-003	89.4278

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Total		0.0100	0.0913	0.0767	5.5000e-004		6.9400e-003	6.9400e-003		6.9400e-003	6.9400e-003	0.0000	99.3543	99.3543	1.9000e-003	1.8200e-003	99.9447
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5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	108188	10.0100	1.6200e-003	2.0000e-004	10.1090
Quality Restaurant	346892	32.0957	5.1900e-003	6.3000e-004	32.4131
Total		42.1057	6.8100e-003	8.3000e-004	42.5221

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	108188	10.0100	1.6200e-003	2.0000e-004	10.1090
Quality Restaurant	346892	32.0957	5.1900e-003	6.3000e-004	32.4131
Total		42.1057	6.8100e-003	8.3000e-004	42.5221

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6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1241	0.0000	2.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	4.4000e-004	4.4000e-004	0.0000	0.0000	4.7000e-004
Unmitigated	0.1241	0.0000	2.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	4.4000e-004	4.4000e-004	0.0000	0.0000	4.7000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0284					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0957					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	2.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	4.4000e-004	4.4000e-004	0.0000	0.0000	4.7000e-004

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Total	0.1241	0.0000	2.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	4.4000e-004	4.4000e-004	0.0000	0.0000	4.7000e-004
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Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0284					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0957					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	2.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	4.4000e-004	4.4000e-004	0.0000	0.0000	4.7000e-004
Total	0.1241	0.0000	2.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	4.4000e-004	4.4000e-004	0.0000	0.0000	4.7000e-004

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	5.4876	0.2014	4.8100e-003	11.9553

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Unmitigated	5.4876	0.2014	4.8100e-003	11.9553
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7.2 Water by Land Use

Unmitigated

Land Use	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
	Mgal	MT/yr			
General Office Building	1.80044 / 1.1035	1.8299	0.0589	1.4100e-003	3.7219
Quality Restaurant	4.36178 / 0.278411	3.6577	0.1425	3.4000e-003	8.2334
Total		5.4876	0.2014	4.8100e-003	11.9553

Mitigated

Land Use	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
	Mgal	MT/yr			
General Office Building	1.80044 / 1.1035	1.8299	0.0589	1.4100e-003	3.7219
Quality Restaurant	4.36178 / 0.278411	3.6577	0.1425	3.4000e-003	8.2334
Total		5.4876	0.2014	4.8100e-003	11.9553

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	4.5734	0.2703	0.0000	11.3304
Unmitigated	4.5734	0.2703	0.0000	11.3304

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	9.42	1.9122	0.1130	0.0000	4.7373
Quality Restaurant	13.11	2.6612	0.1573	0.0000	6.5930
Total		4.5734	0.2703	0.0000	11.3304

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Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	9.42	1.9122	0.1130	0.0000	4.7373
Quality Restaurant	13.11	2.6612	0.1573	0.0000	6.5930
Total		4.5734	0.2703	0.0000	11.3304

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	1	1	50	1340.5	0.73	Diesel

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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10.1 Stationary Sources

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					
Emergency Generator - Diesel (750,000 HP)	0.0550	0.2459	0.1402	2.6000e-004		8.0900e-003	8.0900e-003		8.0900e-003	8.0900e-003	0.0000	25.5134	25.5134	3.5800e-003	0.0000	25.6028
Total	0.0550	0.2459	0.1402	2.6000e-004		8.0900e-003	8.0900e-003		8.0900e-003	8.0900e-003	0.0000	25.5134	25.5134	3.5800e-003	0.0000	25.6028

11.0 Vegetation

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

TAHOE DONNER DOWNHILL SKI LODGE (Existing)

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	11.00	Room	0.37	15,838.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	72
Climate Zone	1			Operational Year	2022
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MW hr)	203.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - TAHOE DONNER DOWNHILL SKI LODGE (Existing). NSAQMD.

Land Use - Existing ski lodge building is 15,838 sf.

Construction Phase - Modeling operations only.

Off-road Equipment - Default equipment.

Off-road Equipment - Modeling operations only.

Trips and VMT - Modeling operations only.

Demolition - Modeling operations only.

Grading - Modeling operations only.

Architectural Coating - Default rates assumed.

Vehicle Trips - No mobile trips assumed.

Vehicle Emission Factors -

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Vehicle Emission Factors -

Vehicle Emission Factors -

Energy Use - Historical rates assumed.

Water And Wastewater - Default rates assumed.

Solid Waste - Default rates assumed.

Fleet Mix -

Stationary Sources - Emergency Generators and Fire Pumps -

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_Nonresidential_Exterior	7919	12250
tblAreaCoating	Area_Nonresidential_Interior	23757	36750
tblConstructionPhase	NumDays	10.00	0.00
tblLandUse	LandUseSquareFeet	15,972.00	15,838.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblVehicleTrips	ST_TR	8.19	0.00
tblVehicleTrips	SU_TR	5.95	0.00
tblVehicleTrips	WD_TR	8.36	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					

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2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Category	tons/yr										MT/yr					
Area	0.0903	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-004	2.0000e-004	0.0000	0.0000	2.1000e-004
Energy	1.8700e-003	0.0170	0.0143	1.0000e-004		1.2900e-003	1.2900e-003		1.2900e-003	1.2900e-003	0.0000	31.5175	31.5175	2.4600e-003	5.9000e-004	31.7563
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	1.2220	0.0000	1.2220	0.0722	0.0000	3.0275
Water						0.0000	0.0000		0.0000	0.0000	0.0885	0.1497	0.2383	9.1200e-003	2.2000e-004	0.5310
Total	0.0921	0.0170	0.0144	1.0000e-004	0.0000	1.2900e-003	1.2900e-003	0.0000	1.2900e-003	1.2900e-003	1.3105	31.6675	32.9780	0.0838	8.1000e-004	35.3150

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0903	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-004	2.0000e-004	0.0000	0.0000	2.1000e-004
Energy	1.8700e-003	0.0170	0.0143	1.0000e-004		1.2900e-003	1.2900e-003		1.2900e-003	1.2900e-003	0.0000	31.5175	31.5175	2.4600e-003	5.9000e-004	31.7563
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	1.2220	0.0000	1.2220	0.0722	0.0000	3.0275
Water						0.0000	0.0000		0.0000	0.0000	0.0885	0.1497	0.2383	9.1200e-003	2.2000e-004	0.5310
Total	0.0921	0.0170	0.0144	1.0000e-004	0.0000	1.2900e-003	1.2900e-003	0.0000	1.2900e-003	1.2900e-003	1.3105	31.6675	32.9780	0.0838	8.1000e-004	35.3150

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	5/1/2023	4/30/2023	5	0	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	0	6.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Hotel	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Hotel	9.50	7.30	7.30	19.40	61.60	19.00	58	38	4

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	M
Hotel	0.383934	0.066570	0.243824	0.166394	0.056716	0.010392	0.008100	0.013374	0.000856	0.000179	0.041061	0.000627	0.0

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.0 Energy Detail

Historical Energy Use: Y

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	13.0420	13.0420	2.1100e-003	2.6000e-004	13.1710
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	13.0420	13.0420	2.1100e-003	2.6000e-004	13.1710
NaturalGas Mitigated	1.8700e-003	0.0170	0.0143	1.0000e-004		1.2900e-003	1.2900e-003		1.2900e-003	1.2900e-003	0.0000	18.4756	18.4756	3.5000e-004	3.4000e-004	18.5853
NaturalGas Unmitigated	1.8700e-003	0.0170	0.0143	1.0000e-004		1.2900e-003	1.2900e-003		1.2900e-003	1.2900e-003	0.0000	18.4756	18.4756	3.5000e-004	3.4000e-004	18.5853

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Hotel	346219	1.8700e-003	0.0170	0.0143	1.0000e-004		1.2900e-003	1.2900e-003		1.2900e-003	1.2900e-003	0.0000	18.4756	18.4756	3.5000e-004	3.4000e-004	18.5853

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Total		1.8700e-003	0.0170	0.0143	1.0000e-004		1.2900e-003	1.2900e-003		1.2900e-003	1.2900e-003	0.0000	18.4756	18.4756	3.5000e-004	3.4000e-004	18.5850
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Mitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Hotel	346219	1.8700e-003	0.0170	0.0143	1.0000e-004		1.2900e-003	1.2900e-003		1.2900e-003	1.2900e-003	0.0000	18.4756	18.4756	3.5000e-004	3.4000e-004	18.5850
Total		1.8700e-003	0.0170	0.0143	1.0000e-004		1.2900e-003	1.2900e-003		1.2900e-003	1.2900e-003	0.0000	18.4756	18.4756	3.5000e-004	3.4000e-004	18.5850

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Hotel	140958	13.0420	2.1100e-003	2.6000e-004	13.1710
Total		13.0420	2.1100e-003	2.6000e-004	13.1710

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Hotel	140958	13.0420	2.1100e-003	2.6000e-004	13.1710
Total		13.0420	2.1100e-003	2.6000e-004	13.1710

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0903	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-004	2.0000e-004	0.0000	0.0000	2.1000e-004
Unmitigated	0.0903	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-004	2.0000e-004	0.0000	0.0000	2.1000e-004

6.2 Area by SubCategory

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0284					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0619					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-004	2.0000e-004	0.0000	0.0000	2.1000e-004
Total	0.0903	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-004	2.0000e-004	0.0000	0.0000	2.1000e-004

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0284					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0619					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-004	2.0000e-004	0.0000	0.0000	2.1000e-004
Total	0.0903	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-004	2.0000e-004	0.0000	0.0000	2.1000e-004

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.2383	9.1200e-003	2.2000e-004	0.5310
Unmitigated	0.2383	9.1200e-003	2.2000e-004	0.5310

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Hotel	0.279034 / 0.0310038	0.2383	9.1200e-003	2.2000e-004	0.5310
Total		0.2383	9.1200e-003	2.2000e-004	0.5310

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Hotel	0.279034 / 0.0310038	0.2383	9.1200e-003	2.2000e-004	0.5310
Total		0.2383	9.1200e-003	2.2000e-004	0.5310

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	1.2220	0.0722	0.0000	3.0275
Unmitigated	1.2220	0.0722	0.0000	3.0275

8.2 Waste by Land Use

Unmitigated

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Hotel	6.02	1.2220	0.0722	0.0000	3.0275
Total		1.2220	0.0722	0.0000	3.0275

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Hotel	6.02	1.2220	0.0722	0.0000	3.0275
Total		1.2220	0.0722	0.0000	3.0275

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

TAHOE DONNER DOWNHILL SKI LODGE (Existing) - Northern Sierra AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Tahoe Donner Downhill Ski Lodge Replacement Mitigation Monitoring or Reporting Program

Environmental Impacts	Number	Mitigation Measure	Reporting Party	Timing
Air Quality	MM-AQ-1	Dust Control Plan. The project applicant shall prepare a Dust Control Plan pursuant to NSAQMD Rule 226 (Dust Control) and Title 18 of the TMC (Section 18.30.030 – Air Emissions). The Dust Control Plan must be submitted to and approved by the Air Pollution Control Officer before topsoil is disturbed. The Air Pollution Control Officer may require use of palliatives, reseeding, or other means to minimize windblown dust. After commencement of development, if the approved elements of the dust control plan prove ineffective, the Air Pollution Control Officer may require additional control measures to be instituted.	Applicant	Prior to grading permit issuance.
Air Quality	MM-AQ-2	Criteria Air Pollutants. The project applicant shall implement the following measures in order to mitigate criteria air pollutants exceeding the NSAQMD level A and level B thresholds during project construction: Level A. a. Alternatives to open burning of vegetative material will be used unless otherwise deemed infeasible by the District. Among suitable alternatives are chipping, mulching, or conversion to biomass fuel. b. Grid power shall be used (as opposed to diesel generators) for job site power needs where feasible during construction. Level B. c. Controls specified above (a and b) shall be implemented. d. Temporary traffic control shall be provided during all phases of the construction to improve traffic flow as deemed appropriate by local transportation agencies and/or Caltrans. e. Construction activities shall be scheduled to direct traffic flow to off-peak hours as much as practicable.	Applicant	Prior to grading permit issuance. Ongoing maintenance.
Air Quality	MM-AQ-3	Asbestos. If naturally occurring asbestos (NOA) is identified during earthwork, the NSAQMD must be notified no later than the following business day and compliance with the statewide Asbestos Toxic Control Measure for Construction, Grading, Quarrying and Surface Mining Operations (Asbestos ATCM) would be required. In regard to surfacing materials, the project is required to comply with the statewide Asbestos Airborne Toxic Control Measure for Surfacing Applications (Surfacing ATCM), which prohibits the use of material containing 0.25% asbestos or greater for surfacing of areas such as pedestrian walkways and pavement.	Applicant	Noted on the plans prior to grading or improvement plan issuance. Ongoing.
Biological Resources	MM-BIO-1	Protection of Active Bird Nests. If ground disturbance activities take place during the breeding/nesting season (March through August), a preconstruction bird nest survey is required and shall be conducted by a qualified biologist no more than 15 days prior to initiation of proposed construction activities. If no active nests are identified during the preconstruction survey, no further actions or restrictions are required. If active nests are found on or immediately adjacent to the site, a nest avoidance plan shall be prepared and implemented with approval from the Town of Truckee and if the Town requests, CDFW. The avoidance plan shall identify appropriate nest buffer zones within which project activities will be precluded to ensure no harm or agitation of nesting birds occurs and a qualified biologist shall monitor the nest(s) and project activities to ensure the buffer zones are adhered to until the nesting birds have fledged. Once the nesting birds have fledged from active nests, there is no longer a need for a nest avoidance plan or to enforce any related nest buffer zones, and project activities could then proceed without any bird nest-related restrictions.	Applicant	Prior to grading permit issuance, if disturbance takes place March through August.
Hydrology	MM-HYD-1	Dewatering Plan. Prior to issuance of a building permit, a California licensed Geotechnical Engineer or Engineering Geologist shall prepare a Dewatering Contingency Plan (Plan) for any dewatering activities that may be required during construction activities. The Plan shall minimize impacts to water quality, including Alder Creek, by incorporation of water quality best management practices (BMPs), e.g. the use of sediment basins or holding tanks, energy dissipators, and/or sediment traps, that are designed and proven to protect water quality of receiving waters. The Dewatering Contingency Plan shall prioritize gravity flow techniques, where feasible, prior to use of pumping techniques and include BMPs for the management of any discharge water. The required BMPs shall be consistent with the most recent California Stormwater Quality Association Construction BMP Handbook for Dewatering Activities (NS-2) and include appropriate BMPs such as setbacks from surface waters and use of low flow rates for discharges. The plan shall be submitted to the Town of Truckee, Lahontan Regional Water Quality Control Board, and any other applicable State agencies, for review and approval prior to issuance of a grading permit.	Applicant	Prior to any ground-disturbing activities

Response to Comments:
Proposed Mitigated Negative Declaration
Tahoe Donner Downhill Ski Lodge

SEPTEMBER 2023

Prepared for:

TOWN OF TRUCKEE

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1 Introduction to Responses to Comments

This section includes comments received during public circulation of the Initial Study (IS) and Mitigated Negative Declaration (MND) prepared for the Tahoe Donner Downhill Ski Lodge project (proposed project). In conformance with Section 15074(b) of the California Environmental Quality Act (CEQA) Guidelines, the lead agency must consider comments received during the MND review period. Although responses to comments on an MND are not required by the CEQA Guidelines, the Town of Truckee (Town) has prepared written responses to address concerns from reviewers of the MND related to the environmental document.

The MND was circulated for a 32-day public review period that began on May 19, 2023, and ended on June 19, 2023. The Town received 27 comment letters during the MND public review period. The scheduled Planning Commission hearing on the proposed project and the proposed MND was continued. The Town accepted additional comments after June 19. While most of these comments reiterated prior comments or stated positions for or against approval of the project, letter P26 raised environmental issues and is therefore included in this Response to Comments document.

2 Responses to Comments

Table 1 identifies comments received regarding the proposed MND, and lists the commenter and date received.

Table 1. Comments Received on the MND

Comment Letter	Commenter	Date Received
Organizations		
O1	Center for Biological Diversity	June 16, 2023
O2	Tahoe Donner Change Group	June 16, 2023
Organizations		
P1	Carol Murota	May 29, 2023
P2	Joanne and Andrew Knox	May 29, 2023
P3	Peter DeMarzo	May 29, 2023
P4	Trish Hackemack	May 29, 2023
P5	Acacia Clark	May 30, 2023
P6	Adrian Fogg	May 30, 2023
P7	Gregory McDougall	June 1, 2023
P8	Edward Littlejohn	June 3, 2023
P9	Eileen Bernhardt	June 3, 2023
P10	Frank Havlik	June 3, 2023
P11	Joan Bush	June 4, 2023

Table 1. Comments Received on the MND

Comment Letter	Commenter	Date Received
P12	Larry Lunde	June 4, 2023
P13	John Kittock	June 5, 2023
P14	Charles Wu	June 6, 2023
P15	Jeffrey Connors	June 6, 2023
P16	Laura Rende	June 6, 2023
P17	Ali Liptrot	June 9, 2023
P18	Jeannette Timmons	June 9, 2023
P19	John Maciejewski	June 9, 2023
P20	Lindsay Chan	June 9, 2023
P21	Cheryll Cross	June 11, 2023
P22	Jeff Shellito	June 12, 2023
P23	James Kelly	June 13, 2023
P24	Karin Ludwig	June 14, 2023
P25	Patricia Schifferle	June 18, 2023
P26	Michelle Gale	June 21, 2023

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response P1-1, for example, indicates that the response is for the first issue raised in Comment Letter P1). Additionally, several “Master Responses” have been prepared to address topics of concern commonly brought up in the comment letters. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project unrelated to its environmental impacts) are noted for the record.

Master Response 1: Groundwater

Several comments were received regarding groundwater impacts at the project site and the proposed drainage system, including feasibility, water quality of foundation drainage system discharges, the shallow groundwater table, and compatibility between the surface stormwater drainage system and the foundation drainage system. Comment Letter O2 included an attachment from Greg Kamman, PG, CHG, of CBEC, Inc. Comment Letter O1 made additional comments regarding construction dewatering and the interaction of groundwater and surface water runoff. These comments are addressed in this response. Surface water is addressed in Master Response 2.

The MND acknowledges the presence of shallow groundwater at the project site. The geotechnical report¹ provides data regarding groundwater elevations observed in 3 of the 4 borings on the site, however, seasonal soil saturation of shallow soils can also occur as a result of snowmelt or precipitation from heavy storms moving vertically through the soil column, which can also be characterized as perched and not indicative of a continuous groundwater table.

¹ NV5. 2021. Tahoe Donner Association Downhill Ski Lodge Geotechnical Engineering Report. November 2021.

As such, saturated soils that were encountered during the geotechnical investigation can not necessarily be interpreted as representing a continuous groundwater table. Regionally, all soils are saturated during spring snowmelt and other rainfall events, so seasonally saturated soils are not necessarily a criteria that represents a barrier to the design and feasibility of infiltration facilities. The stormwater infiltration system that is proposed would be required to adhere to all Town of Truckee Low-Impact Development regulatory requirements which would include requirements for technical feasibility of the proposed system. In addition, as analyzed in the Preliminary Drainage Report², the proposed drainage system also meets Basin Plan requirements of the RWQCB and would also include maintenance requirements to ensure ongoing performance. As a result, the site conditions that include seasonally shallow groundwater levels would not preclude the construction of the proposed infiltration facilities.

The existing building is already excavated into the hillside utilizing retaining walls, and the lower floor footprint is about 9,300 square feet (see attached figure). The existing retaining walls, which represent the area that first intercept groundwater, have foundation drains that are currently discharging to the drainage swale to the east of the site. The existing building level of the lowest floor (level 1) is at an elevation of 6767 feet. The total length of the foundation drain associated with the existing structure is about 225 lineal feet. For purposes of CEQA, the existing structure and existing groundwater drainage is the environmental baseline by which post-project changes in the environment should be evaluated.

Project effects to groundwater can be separated into two categories: construction and post-construction (operation). These issues are addressed separately, below.

Operation

The proposed building foundation is stepped with the grade of the site and level one is the main level of concern regarding foundation drainage due to its lower finished elevation (6,762 feet). Level one has less than half of the footprint than the existing building (about 4,420 square feet) and while the proposed elevation is about five feet lower than the existing lower floor, the total amount of foundation drain proposed is about half (116 lineal feet). As a result, the reduction in the length of the retaining wall would result in a reduced volume of water requiring drainage compared to the existing structure. See Figure 1 for a comparison of the existing and proposed level 1 footprint. One comment letter (Letter O2 – CBEC Letter) conjectures that groundwater is likely to be higher than was observed in the geotechnical test borings, however, the existing structure foundation is already intercepting groundwater, and with the proposed structure foundation, the amount of groundwater is not likely to substantially increase, and may even decrease compared to existing conditions because of the reduction in length of the foundation wall.

Any building foundation may intercept underground water, and this is very common with all types of buildings, roads, and other structures. Foundation drainage has always been part of engineering design to prevent hydrostatic loads on retaining walls and prevent moisture from entering below grade areas. The geotechnical engineer (NV5) has indicated that the volume of groundwater intercepted would be on the order of a few gallons per hour.³ The Town of Truckee ((Stormwater Quality Code and the Public Improvement and Engineering Standards), as well as best practices, do not require treatment of uncontaminated groundwater intercepted in foundation drains. Nevertheless, the drainage system must be designed to the satisfaction of the Town's Engineering Division.

Building Code requirements and geotechnical engineering best practices dictate that the discharge from foundation drains should be to atmosphere in order to reduce the risk of plugging and backing up of water into foundations

² Auerbach Engineering Corporation. 2022. Tahoe Donner Lodge. Preliminary Drainage. December 2, 2022.

³ AEC, AEC Technical Information in support of Responses to Comments, July 18, 2023.

and building interiors, therefore, re-infiltration of that water is not recommended as it constitutes an obstruction in the foundation drainage system and could cause water to back up as described. Building code requirements also dictate how foundation drains are typically constructed. They are typically perforated pipes backfilled with gravel and wrapped (either outside the gravel or the pipe or both) with filter fabric. Water quality of the discharge from foundation drains is typically quite high given the typically high background quality of groundwater prior to capture in the drain, and the multiple filtering systems associated with a foundation drain.

As previously mentioned, the existing foundation contains foundation drains that daylight to the surface much like the proposed foundation drains would. Based on the reduction in length and size of the foundation drainage system (from 225 to 116 feet in length) for level 1 as compared to the existing building foundation drains, the foundation drain discharge is not significantly changing under the proposed condition and could be reduced with the proposed project. The proposed infiltration facilities have been located downslope and set back sufficiently from the foundation to prevent migration of infiltrated water into the foundation drainage system consistent with building code requirements and industry standard geotechnical practices.

Construction As discussed in the MND, the excavation for building foundations would likely encounter groundwater. The project would therefore require temporary construction dewatering. The project site is subject to the State of California Construction General Permit which requires that a Stormwater Pollution Prevention Plan (SWPPP) be prepared and filed with the Lahontan Regional Water Quality Control Board along with the appropriate permit registration documents. The SWPPP contains specific criteria for construction site dewatering, guidance for which is derived from the California Stormwater Quality Association (CASQA). In addition, Mitigation Measure (MM) HYD-1 requires that a dewatering plan be submitted to both the Lahontan Regional Water Quality Control Board (Board) and the Town of Truckee. A draft dewatering plan has been prepared and reviewed by the Board, which did not identify any concerns with the plan.

The basic concept of the dewatering plan, consistent with MM HYD-1, is as follows:

Ground water will be intercepted uphill by installing a French drain behind the proposed excavation and directing the intercepted groundwater via gravity into a capture system such as a wet well with a pump. Water collected that is clean and meets accepted turbidity levels will be pumped up the hill and to the west, into an undisturbed grove of trees that sits topographically above Alder Creek and approximately 500 feet away from the creek. That water will be dispersed with a sprinkler system to ensure that there is no possibility of runoff that would cause erosion of surrounding soils. Water that is collected from the excavation area that is likely more turbid will be delivered into a Baker Tank or equivalent facility to allow it to settle solids before it is pumped to the same location above Alder Creek.

MM-HYD-1 does not improperly defer mitigation as the commenter asserts. MM HYD-1 commits the applicant to performance standards (e.g., timeline, qualifications of who can prepare the Dewatering Contingency Plan, technical guidance, and regulatory approval requirements) consistent with the California Stormwater Quality Association Construction BMP Handbook for Dewatering Activities (NS-2) and Construction Stormwater General Permit, with BMPs that must be incorporated into the SWPPP and dewatering plan, prior to being able to obtain a building permit. Some additional language has been added to MM HYD-1 to clarify issues discussed herein. The minor changes do not require recirculation of the proposed MND per CEQA Guidelines Section 15063.5(c).

Dewatering Plan. Prior to issuance of a building permit, a California licensed Geotechnical Engineer or Engineering Geologist shall prepare a Dewatering Contingency Plan (Plan) for any dewatering

activities that may be required during construction activities. The Plan shall minimize impacts to water quality, including Alder Creek, by incorporation of water quality best management practices (BMPs), e.g. the use of sediment basins or holding tanks, energy dissipators, and/or sediment traps, that are designed and proven to protect water quality of receiving waters. The Dewatering Contingency Plan shall prioritize gravity flow techniques, where feasible, prior to use of pumping techniques and include ~~best management practices (BMPs)~~ for the management of any discharge water. The required BMPs shall be consistent with the most recent California Stormwater Quality Association Construction BMP Handbook for Dewatering Activities (NS-2) and include appropriate BMPs such as setbacks from surface waters and use of low flow rates for discharges ~~sediment basins or holding tanks, energy dissipators, and/or sediment traps~~. The plan shall be submitted to the Town of Truckee, Lahontan Regional Water Quality Control Board, and any other applicable State agencies, for review and approval prior to issuance of a grading permit.

As described in the MND, implementation of the Dewatering Plan and the included BMPs, consistent with the most recent California Stormwater Quality Association Construction BMP Handbook, would ensure that any construction activities involving dewatering is conducted in accordance with proven effective measures that minimize the potential impacts to groundwater and any receiving waters.

Master Response 2: Surface Runoff and Water Quality

The project site was constructed prior to current stormwater requirements and currently has no meaningful stormwater treatment for the runoff from impervious surfaces associated with the existing development. All runoff from the property flows via sheet flow onto surrounding lands and into existing drainage swales that ultimately discharge to Alder Creek.

The proposed project will include stormwater improvements, consistent with state and local requirements for the management and treatment of stormwater runoff, including the Town of Truckee Stormwater Quality Ordinance and the Public Improvement and Engineering Standards. The required standards include the following:

The Town of Truckee Stormwater Quality Ordinance requires that for projects that increase impervious surface area over the pre-project condition, the post-project runoff shall not exceed the estimated pre-project flow rate for the 2-year, 24-hour design storm.

Town of Truckee Standards require on-site treatment by infiltration, evapotranspiration or harvesting of the 85th percentile, 24-hour storm (1.1 inch storm depth for this location). Stormwater conveyance systems must be sized to convey a 10-year storm without system surcharge and a 100-year event without damage.

These improvements include subsurface infiltration chambers to detain stormwater, improving stormwater quality and reducing post-project flow as required.

Regarding comments that these stormwater features will effectively be overwhelmed by groundwater drainage, note that the infiltration facilities are located at least 60 feet from the lower foundation drain. Sixty feet is sufficient distance from the foundation that the infiltration facilities will not have communication with the foundation drains, based on generally accepted geotechnical practices and standards that are consistent with building code requirements.

Master Response 3: Sierra Nevada Yellow-legged Frog

As stated in the MND (Section 3.4), the *Biological Resources Assessment for the ±3-Acre Tahoe Donner Downhill Lodge Project* (Salix 2022) identified fourteen (14) special-status animals through the database search as potentially occurring within the broader region surrounding the Study Area. The Sierra Nevada yellow-legged frog (SNYLF) is one of those 14 species. It was determined not to have the potential to occur on the project site due to lack of suitable wetland or stream habitat. Commenters do not provide substantial evidence that SNYLF may occur on the project site, but instead focus on potential presence in the watershed (which is acknowledged in the Biological Resources Assessment).

Commenters then focus on the potential for the project to result in surface water runoff that adversely affects the water quality in Alder Creek, and therefore affects potential SNYLF habitat. As discussed in Master Responses 1 and 2, the project would not result in a net increase of post-construction runoff and would not result in sedimentation or other water quality impacts to Alder Creek. As noted in prior responses, the project site does not currently have stormwater quality controls in place. By bringing the site up to current standards, including the Town of Truckee Stormwater Quality Ordinance, the stormwater quality would be improved. Therefore, the project does not have the potential to adversely impact SNYLF.

Master Response 4: Expansion of Use and Special Events

Several comments were received regarding the potential for an expansion of use at the proposed ski lodge, either in the form of additional guests (skiers) or special events (such as weddings). Commenters stated that (1) an expansion in size would necessarily mean an expansion in the number of guests at the site, and (2) the original Conditional Use Permit (CUP) for the ski lodge has been lost, and therefore specific restrictions on the ski lodge cannot be enforced.

Regarding the size of the proposed structure, the intent is to provide improved facilities, including kitchen facilities, administration, instructor offices and locker rooms, equipment rental, and maintenance areas, to better serve the existing operation. The most common method of determining the number of users attracted to a particular use is the number of vehicle trips a particular use would generate. It should be noted that the Institute of Transportation Engineers Trip Generation Manual does not have a trip generation rate for ski lodges (or ski resorts). Rather, as noted in studies for other ski projects, including projects in the Tahoe Basin, visitor rates at a ski hill are primarily driven by the number of lifts, the number of trails, and acres of skiable area. None of these factors would be affected by the proposed project. No changes to the parking or the ski hill are proposed as part of this project. It is therefore expected that the number of day visitors will not substantially change. Other studies have also noted that overnight lodging and expansion of retail uses would result in additional trips. Again, none of these components are proposed as part of the project. The applicants are only proposing demolition of the existing ski lodge and reconstruction of a new larger building. See *Homewood Mountain Resort Ski Area Master Plan EIR/EIS*, SCH# 2008092008, Placer County, 2011; *Tahoe Cross-Country Lodge Replacement and Expansion Project EIR*, SCH# 2018062045, Tahoe City PUD, 2020; *Trip and Parking Generation Study of Ski Resorts, an Examination of the Bridger Bowl Ski Resort, Bozeman, MT*, Montana State University Institute of Transportation Engineers, 2011; and *Grant Targhee Resort Master Plan, Traffic Impact Study and Transportation Demand Management Program*, 2009.

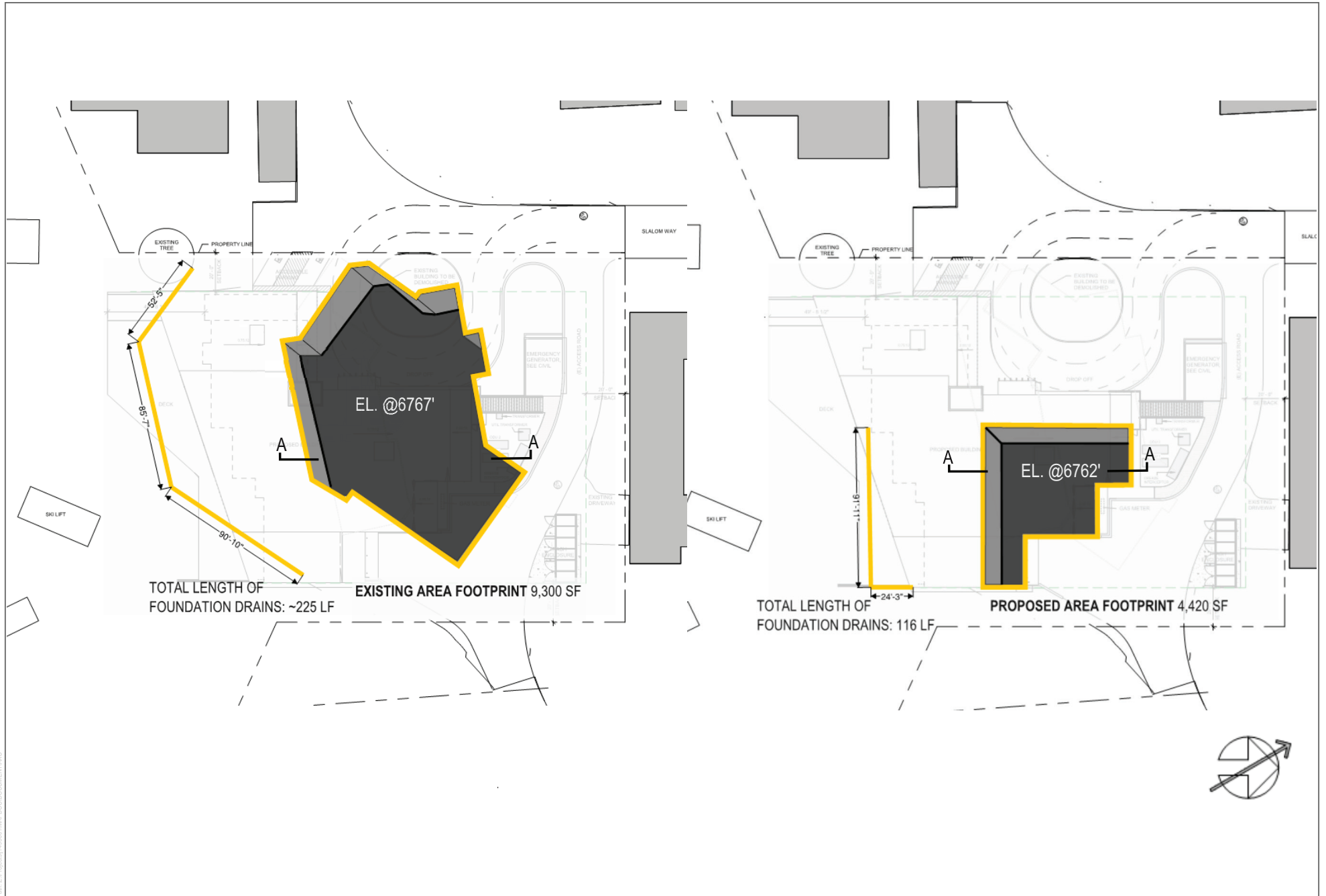
Regarding special events, the project site is zoned Recreation (REC). The existing Tahoe Donner Ski Lodge falls under the use category of "Ski lift facilities and ski runs," which is allowed by Use Permit in the REC zone. The applicant has not requested a change in use from existing operations. The applicant's justification letter clearly

outlines the existing conditions of the Tahoe Donner Downhill Ski Lodge and the Initial Study/Mitigated Negative Declaration. The only events listed in the project description of the existing operations are ski-related events occurring during normal operating hours of the downhill ski resort, two annual community ski-related events held outside of regular operating hours of the resort, and indoor dinner events for ski-related clubs. These are considered normal operations of a ski area. The holding of other special events is not included in the existing use category. If the applicant wanted to hold other special events, the site would be required to be approved as a “Theaters and Event Center,” which is not an allowed use within the REC (Recreation) zoning district, where the Tahoe Donner Downhill Ski Lodge is located. Therefore, such uses at the project site would require an amendment to the underlying zoning, which would require a legislative act that would require review by the Planning Commission and Town Council. The applicant has not requested this amendment as part of this application.

Master Response 5: General Plan Update

Several commenters noted that the Town of Truckee adopted a new general plan, *General Plan 2040*, on May 9, 2023, prior to the release of the proposed Mitigated Negative Declaration on May 19, 2023. Commenters suggest that the project should be considered in light of the newly adopted general plan.

The application for the project was received on June 15, 2022, and deemed complete on August 10, 2022. For the purposes of CEQA, and for determining general plan consistency, the “applicable” general plan is the plan in effect at the time the application is deemed complete, which was *General Plan 2025*.



SOURCE: Bull Stockwell Allen 2023

FIGURE 1

Existing and Proposed Lower Floor Axonometric Footprint

Tahoe Donner Ski Lodge



CENTER for BIOLOGICAL DIVERSITY

June 16, 2023

Yumie Dahn
Senior Planner
Community Development Department
Town of Truckee
10183 Truckee Airport Road
Truckee, CA, 96161

By Email: ydahn@townoftruckee.com

Re: Mitigated Negative Declaration, Tahoe Donner Downhill Ski Lodge

We submit the following comments on the Initial Study/Mitigated Negative Declaration (MND) for the Tahoe Donner Downhill Ski Lodge (SCH #2023050519) on behalf of the Center for Biological Diversity. The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists worldwide, including in members in and around the Truckee/Tahoe region.

01-1

We are concerned that potential impacts of the project have not been fully evaluated and mitigated, and therefore recommend that either the MND be recirculated with additional analysis or a full environmental impact report (EIR) be prepared.

Scope of Analysis

The MND's analysis is generally limited to the project site, resulting in the inadequate consideration of potential off-site and indirect impacts. The overly narrow scope of analysis is particularly problematic with respect to the potential for hydrological changes that may affect special status species outside of the project site. The MND anticipates that the project will require substantial discharges of water pursuant to a yet to be formulated Dewatering Plan. Due to the site's high water table and other site conditions, both the construction and operation of the project threaten to result in the significant offsite discharge of water, yet the MND does not evaluate indirect water quality and other impacts associated with this discharge. This omission is particularly concerning given the proximity of hydrologically-connected Alder Creek, which supports fish and a downstream population of federally-protected Sierra Nevada yellow-legged frogs (see below). A revised environmental analysis should consider the full range of the project's potential hydrological, water quality, and other impacts, including effects that may be felt

01-2

Arizona • California • Colorado • Florida • Minnesota • Nevada • New Mexico • North Carolina • Oregon • Washington • Washington, DC

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Mitigated Negative Declaration, Tahoe Donner Downhill Ski Lodge
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outside the narrowly-described project site analyzed in the MND, and downstream effects on Alder Creek.

↑ 01-2
Cont.

Deferred Analysis

The MND acknowledges (p. 53) that the “discharge of pumped shallow groundwater could cause erosion or transport of sedimentation that adversely affects receiving waters, unless managed appropriately. Accordingly, the MND proposes (p. 54) that MM-HYD-1, the Dewatering Contingency Plan, be developed in the future, subject to final approval by the Town of Truckee and Lahontan Regional Water Quality Control Board.

CEQA permits such postponement of the formulation of specific mitigation measures for a project’s potentially significant impacts only when specific performance criteria are required at the time of project approval. (*Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1029. MM-HYD-1 lacks sufficiently specific performance criteria, and instead merely “prioritize[s] gravity flow techniques prior to the use of pumping techniques” and specifies that the plan shall include best management practices for the management of any discharge of water “consistent with the California Stormwater Quality Association Construction BMP Handbook for Dewatering Activities and include appropriate BMPs such as sediment basins or holding tanks, energy dissipators, and/or sediment traps.”

01-3

Moreover, the MND also defers the *analysis* of the project’s hydrological and water discharge impacts. The MND notes (p. 53) that shallow groundwater was encountered during the preliminary geotechnical investigation, and speculates that adverse impacts could occur due to the discharge of pumped shallow groundwater. The MND, however, does not quantify or include any analysis of this potential impact; it simply proposes MM-HYD-1, which “would require a dewatering plan that would ensure that any dewatering is conducted in a manner that is protective of water quality.” However, “protective of water quality” is a conclusion that can only follow factual analysis of the magnitude and nature of the potential impact, which is absent from the MND. Thus, the MND defers the analysis of this impact until after project approval.

01-4

Similarly, based on the project’s preliminary drainage report, the MND concludes (p. 53) that surface waters would not be adversely affected by project-related stormwater runoff. However, the preliminary drainage report does not evaluate subsurface foundation drainage despite the potential for such post-construction drainage discharges to affect surface water features including Alder Creek. This analysis is absent, and improperly deferred until after project approval. CEQA categorically prohibits such postponement of impact analysis. (See *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 206.)

01-5

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Page 3

Sierra Nevada Yellow-legged Frogs

Sierra Nevada yellow-legged frogs (*Rana sierrae*, SNYLF) are known to occur in the vicinity of the project area. Devastated by introduced fish and the amphibian chytrid fungus, *Batrachochytrium dendrobatidis* (Bd), many populations have been extirpated (Brown et al. 2014). Therefore, it is critical to protect remaining populations so that, in combination with reintroduction efforts, metapopulation dynamics can occur throughout the species' historical range.

01-6

The Project area is located in the northern part of Clade 2 (CDFW et al. 2018). The majority of the SNYLF habitat in this region includes streams (CDFW et al. 2018). Unfortunately, many of these streams remain unsurveyed due to logistical challenges (i.e., steep terrain, dense vegetation), which means that SNYLF inventories are lacking (CDFW et al. 2018). Therefore, it is critical to thoroughly analyze the presence or potential presence of SNYLF in and near the project area, especially in nearby Alder Creek. Researchers have found SNYLF in perennial and intermittent streams, with populations varying in size from less than 15 to more than 500 adults, with individuals moving as far as 1248 m along the water. Targeted surveys following CDFW and USFWS protocols should be conducted, and impacts to SNYLF due to direct and indirect effects of the project, including but not limited to changes in hydrology, sedimentation, stormwater discharge, and drainage, should be analyzed.

01-7

Habitat loss and fragmentation is a high risk for Sierra Nevada yellow-legged frogs (Brown et al. 2014). Although impacts are not necessarily direct from urbanization or agricultural development, habitat degradation due to poor land-use decisions in and near SNYLF habitat can have detrimental effects to individuals and populations. For example, sedimentation can occur from grazing, road runoff, vegetation removal for wildfire breaks, and timber harvest (Brown et al. 2014). Sedimentation may reduce interstitial spaces within the streambed that amphibians like SNYLF may use for cover, foraging, or laying eggs (Welsh and Ollivier 1998). While adults and subadults have been found in areas dominated by silt, they prefer cobble or boulders (Brown et al. 2020). Tadpoles have been found in tributaries with gravel or cobble substrate or in grassy side pools outside the main flow of a stream (Brown et al. 2020). Sedimentation from surrounding land use, or from direct dumping of excavated soils, could have significant impacts on SNYLF.

01-8

Sedimentation can also lead to lowered water tables in riparian and meadow habitats, which can eliminate year-round waterbodies that tadpoles need to overwinter (Brown et al. 2014). Tadpoles stay in water for 2-4 years before metamorphosis; if water is not deep enough for some water to remain unfrozen during the winter, tadpoles will die (Brown et al. 2014). Sedimentation can also affect benthic macroinvertebrates in the streambed (Cover et al. 2008; Lawrence et al. 2011), which can reduce their availability as food for amphibians like SNYLF. Any changes to a region's hydrology or actions that lead to

Mitigated Negative Declaration, Tahoe Donner Downhill Ski Lodge
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increased sediment in the nearby Alder Creek requires thorough analyses to determine potential impacts to SNYLF.

Land Use and Planning

The MND asserts (p. 57) that potential impacts due to conflicts with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect have been analyzed in the prior General Plan EIR. The MND also asserts (pp. 56-57) that the project would not interfere with any water quality control plan. However, the Lahontan Basin Plan prohibits the discharge of “solid or liquid waste materials including soil, silt, clay, sand, and other organic or earthen materials to lands within the 100-year floodplain of the Little Truckee River or any tributary to the Little Truckee River ...”¹ The MND, however, contains no analysis of potential waste discharges within the 100-year floodplain of any tributary to the Little Truckee River, although project construction and operation has the potential to result in such discharges. The MND likewise contains no analysis of the project’s potential conflicts with the Basin Plan. T

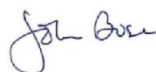
For these reasons, the MND should be revised to include the required additional analyses, or a full EIR should be prepared. Thank you for your consideration of these comments.

↑ 01-8
| Cont.

| 01-9

| 01-10

Sincerely,



John Buse
Senior Attorney
Center for Biological Diversity



Tiffany Yap, DEnv/PhD
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¹https://www.waterboards.ca.gov/lahontan/water_issues/programs/waste_discharge_requirements/timber_harvest/docs/timber_waiver/attn_bppe14.pdf

Response to Comment Letter O1

**Center for Biological Diversity
John Buse and Tiffany Yap
June 16, 2023**

- 01-1** The comment serves as an introduction to the comment letter and recommends recirculation of the MND or preparation of a full environmental impact report (EIR). Responses to environmental issues are addressed below.
- 01-2** Refer to Master Response 3: Sierra Nevada Yellow-legged Frog.
- 01-3** Refer to Master Response 1: Groundwater.
- 01-4** Refer to Master Response 1: Groundwater.
- 01-5** Refer to Master Response 2: Surface Runoff and Water Quality.
- 01-6** Refer to Master Response 3: Sierra Nevada Yellow-legged Frog.
- 01-7** Refer to Master Response 3: Sierra Nevada Yellow-legged Frog.
- 01-8** Refer to Master Response 3: Sierra Nevada Yellow-legged Frog.
- 01-9** Refer to Master Response 2: Surface Runoff and Water Quality.
- 01-10** The comment serves as a conclusion to the comment letter. The comment itself does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

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Comment Letter 02

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Senior Planner Yumie Dahm
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June 16, 2023

Subject: Comments on the MND prepared for the Tahoe Donner
Downhill Ski Lodge Replacement Project

Via email

Dear Ms. Dahm:

On behalf of the Tahoe Donner Change group, thank you for the opportunity to comment on the Mitigated Negative Declaration (MND) prepared for the Ski Lodge project.

02-1

In January of this year I wrote to you explaining the problems with proceeding with an MND without an existing or a proposed new Conditional Use Permit for existing facility and the proposed ski lodge replacement project. (Attached letter to the Town, 1/12/23.) I include it here by reference because it also refers to potentially significant impacts that should be addressed that were not responded to by the Town at the time nor have they been addressed in the MND.

02-2

I stated:

It's my understanding that it is Truckee Planning's position that the original conditional use permit (CUP) for the existing lodge facility is considered lost, at this time. The lack of a current CUP for the existing ski lodge presents a couple of problems I wish to draw to your attention with regard to the adequacy of the proposed environmental review for the project.

In order to accurately assess the environmental impacts of the proposed expansion, it is necessary to have a stable setting in which the environmental impacts will be adjudged. It is thus vital to thoroughly lay out the existing nature of the current operation in terms of hours of operation, the extent of services offered, the number of employees, the availability of parking, and any conditions imposed on lighting, parking and

traffic, noise, etc. and any mitigation measures that have been implemented to reduce the facility's current environmental impacts. The MND will compare the existing operation with the proposed project, lay out the differences, analyze all potentially significant environmental impacts related to those differences, then impose mitigation measures sufficient to reduce all potentially significant impacts to insignificance.

02-2
Cont.

The details regarding the current use will also establish a baseline in which all environmental impacts will be assessed. Without having the CUP in hand, how will Planning proceed in establishing the baseline for the performance of the necessary environmental analyses related to a legally adequate MND?

The MND now states:

The proposed project is the demolition of the existing ski lodge at the Tahoe Donner Ski Area and construction of a new ski lodge in its place. The proposed uses *remain unchanged from existing ski lodge uses*. The replacement lodge will serve as a ski lodge facility for guests at the Tahoe Donner Downhill Ski Resort and provide improved facilities and services.
(Page 1, MND, emphasis added.)

02-3

The MND opines that existing uses will remain unchanged but fails to state what the terms *of the existing use permit* comprise. As explained in the January letter, this is wholly inadequate; the terms and conditions of the existing use must be established by permit otherwise there is no basis to assume the uses described in the MND have any basis in fact. The MND thus fails to adequately describe the existing setting for the environment and fails to establish a baseline for which environmental impacts can be fairly adjudged. The MND is inadequate and incomplete without knowing the existing limitations of the now lost CUP. Why hasn't the Town required the project applicant to apply for a new CUP so that there may be some certainty in the description of the environmental setting and the conditions that are reasonably applicable to this as well as all other proposed development projects, especially one of such a substantial nature as this.

Further, since the replacement project is over 60% larger than the existing lodge and proposes year-round use, it doesn't seem credible to assume that the use will remain the same. How many guests does the existing facility serve? What are the existing limitations to the number of guests that could be served by the existing facility? What are the proposed expansions to those uses? How many guests could the new facility serve?

02-4

Finally, by describing the current use outside of the parameters of the conditions of a current use permit, the MND is essentially establishing a new use without requiring the applicant to comply with the conditional permit process established by the Town and by which all other projects must comply. How would the Town enforce activities outside the current use without a document that designates those provisions? Without a mechanism for ensuring the terms of such use are in place, there is no way to for the Town to prohibit expanded uses or to demand compliance. The MND's claim that project will generate no unmitigated negative environmental consequences is therefore unfounded and is not supported by substantial evidence.

02-5

The "whole of the action" must be considered in the MND and has not.

In my January letter to the Town I stated:

CEQA requires that all components of the project be included in the environmental review so that the environmental impacts of the whole project be considered at one time. All phases of a project must be considered as the "whole of the action," so that "environmental considerations do not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." *Bozung v. Local Agency Formation Commission of Ventura County* (1975) 13 Cal.3d 263, 283-284, *Burbank- Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577. *Citizens Association for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151, 167, held that "[t]he division of the shopping center project into two parts constituted an abuse of discretion" Guideline section 15126 provides that "[a]ll phases of a project must be considered when evaluating its impact on the environment..." *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170 ruled an Initial Study inadequate because it failed to consider the "whole of the action" in amending a beach plan to allow increased use of the beach by unleashed dogs.

02-6

Here, the Four Season Event Center includes the use of the project expansion for a portion of its uses. If this use is a foreseeable component of the project then it must be included in the environmental review.

The MND fails to divulge all potential users of the new facility. It seems quite obvious that if the facility is expanded to include new users, the use may commensurately be expanded and the potentially significant impacts of the project would foreseeably increase due to this added use. The MND must fully describe all existing, proposed, and foreseeable uses of the facility; the Town must consider the "whole of the action" and include all foreseeable uses in its analysis in order to avoid "piece-mealing", or the segmentation of environmental review, which is disallowed under CEQA. The project description must include future activities

02-7

that may become part of the project. (*Laurel Heights Improvement Ass'n v Regents of the University of California (Laurel Heights I)* (1988) 47 C3d 376, 399 [reasonably foreseeable expansion of research facility must be discussed].)

It is insufficient to claim that further review will be required at a later time. Environmental documents should be prepared as early as feasible in the planning process so that environmental factors will influence project design. (Guideline §15004(b).) An agency must consider environmental problems at a point in the planning process where “genuine flexibility” remains to alter the project. (*Mount Sutro Defense Committee v Regents of the University of California* (1978) 77 CA3d 20, 34.)

In this case, the time to review the potential uses of a new facility is *before* it is built, not after the project is in place; by then, any “genuine flexibility” in altering the project design to avoid potentially significant impacts will be lost.

Substantial evidence of potentially significant impacts

In the January letter to the Town, I stated:

It also appears that the project may have potentially significant compliance issues with the existing Basin Plan and potentially significant environmental impacts related to the high-water table and groundwater aquifer, due to the proposed extensive excavation and waste water discharge issues, requiring full CEQA review and implementation of all feasible mitigation measures. The Geotechnical Engineering report prepared by the engineering firm NV5, and the “Wetlands Constraints” described in the Salix Consulting, Inc. report both reference groundwater aquifer and high water table issues that will have to be fully mitigated in order for the MND to be a legally sufficient environmental document, especially in light of adjacent wetlands and the nearby Alder Creek, a tributary of the Little Truckee.

The attached report from registered geologist and hydrogeologist, expert Greg Kamman, PG, CHG, Senior Ecohydrologist, establishes a fair argument of impacts due to hydrology, drainage, water quality, and biological resources. (Attached report by Greg Kamman, PG, CHG.) Expert Kamman states:

Based on my review of these materials, it is my professional opinion that the IS/MND does not evaluate all potential significant impacts of project actions on hydrology/drainage, water quality and biological resources. It is my opinion that the stormwater and foundation drainage systems are incompatible as designed and the potential significant impacts due to this conflict have not been evaluated. (Page 2, attached report from Greg Kamman, PG, CHG.)

02-7
Cont.

02-8

02-9

The report states that critical information has not been provided, the potential effects of the project have not been adequately analyzed, nor has appropriate mitigation been drafted. (Attached Kamman report, pages 2-6.)

↑ 02-9
Cont.

It's important to note that CEQA must be interpreted "to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (*Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259; Guideline § 15003, subd.(f).) Failure to follow CEQA's requirements "would subvert the very purpose of the Act." (*No Oil, supra*, 13 Cal.3d 68 at 81.) An EIR "protects not only the environment but also informed self-government." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.) The EIR is both the heart "and soul" of CEQA. (*Planning and Conservation League v. Department of Water Resources* (2000) 83 Cal.App.4th 892, 911; CEQA Guidelines (14 California Code of Regulations §§ 15000 *et seq.*) § 15003(a).)

02-10

The following is a legal interpretation of the standards for presenting a fair argument of environmental impacts, sufficient to trigger the preparation of an EIR.

The "Fair Argument" Standard of Review

As a matter of law "an EIR is required 'whenever it can be fairly argued on the basis of substantial evidence that [a] project *may have* significant environmental impact.' [citation]." (*Friends of the San Mateo Gardens v. San Mateo Community College District* (2016) 1 Cal. 5th 937, 957, 959 "*Gardens I*"; Pub. Resources Code §§ 21082.2(a), 21100, 21151; Guidelines, §15064(f)(1); *No Oil v. City of Los Angeles* (1974) 13 Cal.3d 68, at 75; *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 111-112, [emphasis added].) "May" means a reasonable possibility. (*League for Protection of Oakland's Architectural Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, 904-05; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, at 309.)

02-11

Low-Threshold Test

Stanislaus Audubon Society v. County of Stanislaus (1995) 33 Cal.App.4th 144, 151, held that the fair argument standard is a "low threshold" test and that an agency should not give an "unreasonable definition" to substantial evidence, "equating it with overwhelming or overpowering evidence, as CEQA does not impose such a monumental burden" on those seeking to raise a fair argument of impacts.

02-12

Evidence supporting a fair argument of any potentially significant environmental impact triggers preparation of an EIR regardless of whether the record contains contrary evidence. (*League for Protection, supra*, 12 Cal.App.4th 896; *Sundstrom, supra*, 202 Cal.App.3d 296 at 310, [emphasis added].) Under this unique test "deference

to the agency's determination is not appropriate and its decision not to require an EIR can be upheld only when there is no credible evidence to the contrary." (*Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1318.) This low threshold requirement "reflects a preference for resolving doubts in favor of environmental review when the question is whether any such review is warranted." (*League for Protection, supra*, 52 Cal.App.4th 896, 905.) In *Pocket Protectors v. City of Sacramento, supra*, 124 Cal.App.4th 903 at 927, the court stated that the "fair argument" standard differs significantly from the deferential review normally enjoyed by agencies:

If there is substantial evidence in the whole record supporting a fair argument that a project may have a significant non-mitigable effect on the environment, the lead agency shall prepare an EIR, *even though* it may also be presented with other substantial evidence that the project will not have a significant effect. (§ 21151, subd. (a); Cal. Code Regs., tit. 14, § 15064, subd. (f)(1), (2) n17; *No Oil, supra*, 13 Cal.3d 68, 75; *Architectural Heritage Assn. v. County of Monterey* (2004) 122 Cal.App.4th 1095, 1109; *Communities for a Better Environment, supra*, 103 Cal.App.4th 98 at 111-112; [emphasis added].)

A MND is lawful only when "*clearly* no significant effect on the environment would occur, and ... there is *no* substantial evidence, in light of the whole record" that such impacts may follow project approval, taking into account adopted mitigation measures. (Pub. Resources Code § 21080 subd.(c); Guideline § 15064, subd.(f).) In *Sierra Club v. County of Sonoma, supra*, 6 Cal.App.4th 1307, the Court held that under the fair argument standard:

... the question is one of law, *i.e.*, 'the sufficiency of the evidence to support a fair argument.' [Citation.] Under this standard, deference to the agency's determination is not appropriate and *its decision not to require an EIR can be upheld only when there is no credible evidence to the contrary.* (*Id.* at 1317-1318, emphasis added.) *Sierra Club* holds that *no deference* be paid to an agency's decision not to require an EIR. (*Id.* at 1316.) *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, joined numerous cases that have cited *Sierra Club* with approval. (*Id.* at 580.)

Question of Law, Not Fact

Whether an administrative record contains a fair argument sufficient to trigger preparation of an EIR is a question of law, not fact. *Stanislaus Audubon Society, supra*, 33 Cal.App.4th 144 at 151 (citing *Sierra Club* and *Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597) rejected approval of a negative declaration for a golf course project, and in requiring preparation of an EIR again held that "[a]pplication of [the fair argument] standard is a question of law and deference to the agency's determination is not appropriate." (*See also, Tuolumne*

02-12
Cont.

02-13

County Citizens for Responsible Growth v. City of Sonora (2007) 155 Cal.App.4th 1214, *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013, 1053.)

02-13
Cont.

A conflict in expert opinion over the significance of an environmental impact normally requires preparation of an EIR. (Guideline §15064(g).)

Here, Greg Kamman’s report presents substantial expert opinion of a fair argument of impacts such that an EIR must be prepared as a matter of law. The MND is inadequate and incomplete because of the failure to: describe the existing setting; divulge potentially significant direct, indirect and cumulative impacts to hydrology, water quality, drainage, and biological resources; provide an accurate project description and environmental setting; consider foreseeable uses of the whole of the action; and to consider feasible mitigation measures to reduce impacts to insignificance.

02-14

I note that I have just received the Town’s staff report on Friday, June 16, for the upcoming Tuesday, June 20, 2023 Planning Commission hearing that indicated staff recommends approval of the MND and the project *prior to the end* of the comment period for the MND. Aside from the fact that the 20-day comment period oddly and unaccountably concludes on the Sunday of a holiday weekend, June 18, Father’s Day, I am submitting these comments and the attached expert opinion on Friday, the 16th, the last business day before the deadline of June, 18.

02-15

The Tahoe Donner Change group requests the upcoming hearing to be continued so that decision makers have a reasonable opportunity to review the comments on the MND *prior to* making their decision regarding whether to approve the ski lodge project and its accompanying environmental review. It is the community’s obligation to put the Town on notice of any errors in the review so that decision makers have the opportunity to take appropriate action that takes into account critical information about a project’s environmental effects and has the time to craft feasible mitigation measures that avoid the project’s impacts prior to adopting the project. At this point, the Town will have fewer than 48 hours to consider the comments on the MND; this is insufficient to consider the detailed expert hydrological testimony presented by Greg Kamman and the other substantive letters that are being submitted regarding the adequacy of the MND.

02-16

Sincerely,

Rachel Mansfield-Howlett

Response to Comment Letter O2

Tahoe Donner Change Group
Rachel Mansfield-Howlett
June 16, 2023

- 02-1** The comment serves as an introduction to the comment letter. The comment itself does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- 02-2** The comment references past communication with the Town regarding the lack of an existing Conditional Use Permit (CUP) for the existing ski lodge facility and suggests that the existing setting/baseline cannot be described without the details of the CUP. CEQA Guidelines section 15125 generally defines the baseline for an MND as the physical environmental conditions at the time environmental analysis is commenced. The baseline is not based on the limits of an issued permits where those limits have historically not been implemented. In order to accurately assess the potential impacts of the proposed project, the baseline is based on the existing use pattern of the ski lodge. This includes regular hours of operation, the frequency of community events, parking availability, maintenance activities, and staffing levels. This information is provided in the MND beginning on page 10. There are a series of subsequent building permits related to grading for ski lift facilities, improvements to the lodge building cafeteria, construction of a new office building and a new yurt for the ski school. While the original Use Permit could not be located, it is understood that the Downhill Ski Area is a legal use and has operated on an ongoing, seasonal basis since the early 1970s. Also refer to Master Response 4: Expansion of Use and Special Events.
- 02-3** Refer to Response to Comment (RTC) O2-2 and Master Response 4: Expansion of Use and Special Events.
- 02-4** Refer to Master Response 4: Expansion of Use and Special Events.
- 02-5** Refer to Response to Comment (RTC) O2-2 and Master Response 4: Expansion of Use and Special Events.
- 02-6** The commenter does not identify specific activities that are not included in the project description. See also Master Response 4.
- 02-7** See Master Response 4.
- 02-8** Refer to Master Response 1: Groundwater.
- 02-9** Refer to Master Response 1: Groundwater, Master Response 2: Surface Runoff and Water Quality, and Master Response 3: Sierra Nevada Yellow-Legged Frog.
- 02-10** The comment makes various legal citations related to CEQA statute and caselaw. Specific environmental issues are addressed in other comments and accompanying responses.
- 02-11** The comment describes the standard of review under CEQA. Specific environmental issues are addressed in other comments and accompanying responses.

- 02-12** The comment makes various citations regarding the “fair argument” standard under CEQA. Specific environmental issues are addressed in other comments and accompanying responses.
- 02-13** Refer to RTC 02-12.
- 02-14** Refer to Master Responses 1, 2, and 3. The comments by Kamman fail to take into account the existing environment (baseline) when making assertions regarding potential project impacts.
- 02-15** The comment itself does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- 02-16** The Town has continued the Planning Commission hearing scheduled for June 20, 2023. No further response is required.

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Yumie Dahn

From: CMurota [REDACTED]
Sent: Monday, May 29, 2023 12:23 PM
To: Yumie Dahn
Subject: Tahoe Donner Lodge permit

You don't often get email from cmurota@gmail.com. [Learn why this is important](#)

To Whom It May Concern,

I object vigorously to the proposed Tahoe Donner Downhill Lodge facility. There are numerous concerns that the Tahoe Donner Board has not considered, despite the residents bringing many of them to their attention. I hope you will deny a permit unless and until these worries are addressed.

┌ P1-1

The current Lodge does not see a lot of usage, by visitors or by Tahoe Donner owners. The proposed replacement ski lodge is significantly larger than the current under-utilized Lodge. I repeat, it is difficult to imagine that making a larger facility will bring more visitors, or increase usage.

┌ P1-2

Most importantly, the Town Planning Commission and the City Council has approved environmental requirements, goals and policies for Truckee. It is important that the new ski lodge be required to meet these 2040 standards and there be an enforcement piece to this requirement. I don't see that these protections for Truckee and Tahoe Donner neighbors are part of the proposal.

┌ P1-3

I am further concerned that the excavation necessary to build the proposed ski lodge will cause drainage issues for downstream neighborhoods, both for groundwater and wastewater.

┌ P1-4

I do not see surveys that confirm Alder Creek's fish, threatened and endangered species are protected.

┌ P1-5

Please deny the Tahoe Donner permit unless and until these concerned are addressed. This has been a divisive proposal. I do not believe the majority of Tahoe Donner homeowners support this project. It is completely out of character with the community.

┌ P1-6

Thank you for closely examining this permit.

Sincerely,

Carol Murota
Tahoe Donner homeowner

Response to Comment Letter P1

Carol Murota
May 29, 2023

- P1-1** The comment serves as an introduction to the comment letter. Specific issues are addressed below.
- P1-2** Refer to RTC O2-2 regarding existing operations of the current ski lodge. The comment is noted and forwarded to the decision makers for their consideration. This comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- P1-3** Refer to Master Response 5: General Plan Update.
- P1-4** Refer to Master Response 1: Groundwater and Master Response 2: Surface Runoff and Water Quality.
- P1-5** The BRA prepared for the proposed project, and available at the location specified in the Notice of Intent, includes an evaluation of potentially occurring special-status species within the project area. The BRA concluded found that only 4 animal species have some potential to occur within or adjacent to the project site, none of which are fish. Impacts related to sensitive or special status species are further addressed in Section 3.4, Biological Resources, of the MND. Please also refer to Master Response 3: Sierra Nevada Yellow-Legged Frog.
- P1-6** The commenter's opinions are noted and forwarded to the decision makers for their consideration. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Yumie Dahn

From: Joanne Knox [REDACTED]
Sent: Monday, May 29, 2023 10:36 AM
To: Yumie Dahn
Cc: Andrew Knox
Subject: Please Reject the proposed Tahoe Donner Ski Lodge project

You don't often get email from joannefknex@gmail.com. [Learn why this is important](#)

I am writing to encourage the Town of Truckee to reject the proposed Tahoe Donner Ski Lodge unless and until it is downsized and redesigned to eliminate the significant adverse environmental impacts that would otherwise occur.

P2-1

Some of my concerns are outlined below:

- As designed, the new ski lodge would be exempt from the standards, environmental requirements, goals and policies of Truckee 2040, the new General Plan update recently approved by the Town Planning Commission and City Council

P2-2

- The proposed Downhill ski lodge is designed to serve and operate as a new year-round Four Season Event Center. It is intended to serve as another venue for holding weddings, banquets and special events, as well as house a new Mountain Bike and Outdoor Sports Center in summer and fall. The new lodge would be one of the largest restaurant and bar facilities in Truckee, potentially larger than TD's Lodge restaurant

P2-3

- With 3-stories and a 9,000 sf more space, the proposed ski lodge is too large and inappropriate for the small, existing site. The new structure will have a different footprint requiring the underground foundation to be excavated 12 – 13 feet below the existing ground surface and adjacent hillside.

P2-4

- The excavation required for the lodge footprint could penetrate the multiple lenses of shallow subterranean groundwater at the site which risks producing a continuous and large new stream of water concentrated on the property line. There is a risk this will cause significant flooding and drainage issues throughout the Ski Bowl Condo complex and nearby downstream TD neighborhoods.

P2-5

- The waste water and sediment discharge that excavation could cause will have to be pumped out from the site and drained, potentially impacting nearby Alder Creek, a perennial fish-bearing stream and tributary of the Upper Truckee River. However, the creek and its riparian corridor have not been surveyed for the presence of threatened or endangered species, such as the Northern Sierra Yellow-Legged Frog and Lahontan Cutthroat Trout.

P2-6

For all these reasons, the Town of Truckee should reject the proposed Tahoe Donner Ski Lodge.

P2-7

Thank you for reading
Joanne and Andrew Knox
13 year TD residents

Response to Comment Letter P2

Joanne and Andrew Knox
May 29, 2023

- P2-1** The comment serves as an introduction to the comment letter. Specific issues are addressed below.
- P2-2** Refer to Master Response 5: General Plan Update.
- P2-3** The holding of special events, including weddings, are not included in the existing use category of the project site, nor in the requested entitlements. Refer to Master Response 4: Expansion of Use and Special Events.
- P2-4** The commenter's opinion is noted and forwarded to the decision makers for their consideration. The comment does not address the accuracy or adequacy of the MND; therefore, no further response is required.
- P2-5** Refer to Master Response 1: Groundwater and Master Response #2: Surface Runoff and Water Quality.
- P2-6** The commenter claims that Alder Creek and its riparian corridor have not been surveyed for threatened or endangered species, including the Northern Sierra yellow-legged frog and the Lahontan Cutthroat Trout. As stated in the MND (Section 3.4), the BRA identified 14 special-status species through the database search as occurring within the broader region surrounding the study area (project site). This included Lahontan cutthroat trout and Sierra Nevada yellow-legged frog. 10 of the 14 special-status species were determined to have no potential to occur within the project site due to lack of suitable habitat, including both the Lahontan cutthroat trout and Sierra Nevada yellow-legged frog. Refer to Master Response 3: Sierra Nevada Yellow-Legged Frog regarding water quality impacts to Alder Creek.
- P2-7** The commenter's opinion is noted and forwarded to the decision makers for their consideration. The comment itself does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Comment Letter P3

Yumie Dahn

From: Peter DeMarzo [REDACTED]
Sent: Monday, May 29, 2023 1:25 PM
To: Yumie Dahn
Subject: Support for TD Ski Lodge plans

You don't often get email from peter@demarzo.com. [Learn why this is important](#)

Hi,
I am just writing to express my support for the Tahoe Donner Ski Lodge plans. It has been a long and well-researched project. While there is some disagreement within TD membership regarding the plans, with 6000 homeowners unanimity will never be achieved. Further delays will just increase costs with no meaningful change or improvement.
Thanks,
Peter D.
Tahoe Donner Member

┌ P3-1

Response to Comment Letter P3

Peter DeMarzo
May 29, 2023

- P3-1** The commenter's opinion is noted and forwarded to the decision makers for their consideration. The comment itself does not raise any environmental issues related to the adequacy of the MND analysis, and no further response is required.

Yumie Dahn

From: trish hackemack [REDACTED]
Sent: Monday, May 29, 2023 2:14 PM
To: Yumie Dahn
Subject: Objections to Tahoe Donner's replacement lodge

You don't often get email from trish.hackemack@gmail.com. [Learn why this is important](#)

Dear Yumi and the Town of Truckee,

Thank you for the opportunity to voice my concerns about this project. Like the majority of Tahoe Donner members who voted in January 2022, I oppose the size of this "replacement" project. Below are the reasons for my opposition:

- The new lodge is too big for the site and the current usage. The design and size indicate that the un-spoken plan for the building is four-season usage. The Tahoe Donner Association should have to obtain an enforceable Conditional Use Permit (CUP) for the current usage of the site. As a close neighbor to the lodge, I am concerned about the noise and traffic a four-season event center and large restaurant will bring. Parking and traffic during the ski season are awful for about 4-months of the year. I dread living with these same problems all year long.
- I am concerned about the much larger footprint of this new lodge and that it will require excavation of 12 – 13 feet below the existing surface and adjacent hillside. This depth of excavation required for the lodge could impact the shallow groundwater at the site. I understand there is a significant risk of flooding and drainage issues with both the Ski Bowl Condo complex and the nearby downstream TD neighborhoods. This could adversely affect our property values.
- The potential wastewater and sediment discharge due to excavation could impact beautiful Alder Creek. It could adversely impact the health of the Creek and and downstream the Truckee River. I understand that the waste water and sediment could impact threatened or endangered species, such as the Northern Sierra Yellow-Legged Frog and Lahontan Cutthroat Trout. I've not seen an analysis of the potential volume of wastewater that would have to be pumped out and drained from the excavation pits and managed. Where will it go if not Alder Creek?
- What would the ramifications be if the replacement plans were subject to the standards, environmental requirements, goals and policies of Truckee 2040? I suspect the plans would not meet those requirements and goals. I am concerned that the current Tahoe Donner plans are not subject to the well-thought out long-term view of Truckee 2040.

I sincerely hope that the Town of Truckee rejects the proposed Tahoe Donner Ski Lodge as currently planned. We need a replacement, not this grand scheme of a building meant to increase usage to year-round and negatively impact the peace and quiet of our neighborhood in the 8-months of the year outside of the ski season. As a long-time environmentalist, I am also concerned with the potential adverse environmental impacts. We simply do not need to bear these risks. These risks could be avoided with a lodge that is truly a "replacement" lodge.

Thank you,

Patricia L. Hackemack
[REDACTED]

P4-1
P4-2
P4-3
P4-4
P4-5
P4-6

Response to Comment Letter P4

Trish Hackemack
May 29, 2023

- P4-1** The comment acts as an introduction to the comment letter. The commenter's opinion is noted and forwarded to the decision makers for their consideration. The comment itself does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- P4-2** Refer to RTC 02-2 and Master Response 4: Expansion of Use and Special Events.
- P4-3** Refer to Master Response 1: Groundwater and Master Response 2: Surface Runoff and Water Quality.
- P4-4** Refer to Master Response 2: Surface Runoff and Water Quality, RTC P2-6, and Master Response 3: Sierra Nevada Yellow-legged Frog.
- P4-5** Refer to Master Response 5: General Plan Update.
- P4-6** The commenter's opinion is noted and forwarded to the decision makers for their consideration.

From: [REDACTED]
To: [Yumie Dahn](#)
Subject: Strong objections / concerns for TD ski lodge project
Date: Tuesday, May 30, 2023 9:21:17 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

Hello,

As a TD homeowner ([REDACTED]) and as a parent of young children who learned to ski at Tahoe Donner last year, I wanted to share my **strong objections** to the current proposal for the new ski lodge.

P5-1

1. It is massive construction and expansion when no (or little) expansion is needed. The current lodge is often empty aside from a couple holiday periods. We should not be building to accommodate a few holiday weekends, but rather for regular use.
 - o It's too much of a toll re: noise, environmental disruption, traffic, etc to accommodate what will largely be tourists from out of town.
 - o Instead, the board should just not allow non-members to use TD during holiday periods. Happy medium.
2. A large ski lodge will never bring in enough people to justify the massive costs. Take our family, for example: Three kids age 8 & under. They learned to ski at TD in 2021-2022 -- we had a season pass last year. **And we will never go there again to ski**, aside for some special events like the light parade -- it's too small and beginner level. Tahoe Donner is a great beginner area, but it will never get families coming back year after year because as soon as kids are past beginner level, most want more -- so they move on to large resorts.
3. The Tahoe Donner board is ignoring the vast majority of membership who don't want a massive project in their backyard, and which all of us will have to subsidize. It's abusive and I hope it keeps getting challenged on a legal basis.
 - o None of us members want or will use massive event spaces like what they're proposing.
 - o If the board wants the event space, the board should find a 3rd party to construct event spaces and not on top of people's backyards.
 - o I feel sorry for the people who live back near the ski slopes and whose quiet enjoyment of their property will be forever ruined if this project goes forward.

P5-2

P5-3

P5-4

P5-5

I hope the town listens to members and works with the TD board to dramatically reduce the footprint of this massive project so its impact will not be so great on neighbors, members, and the environment.

P5-6

Thank you,

Acacia Clark
[REDACTED]

--
Acacia Clark
Financial/Educational Consultant | Copy Editor | Realtor
[REDACTED]

Response to Comment Letter P5

Acacia Clark
May 30, 2023

- P5-1** The comment serves as an introduction to the comment letter and expresses objections to the proposed project. Specific issues are addressed below.
- P5-2** The commenter's opinion is noted and forwarded to the decision makers for their consideration. The comment states that the proposed project would impact noise and traffic, and other environmental factors not specifically stated. Refer to Sections 3.13, Noise and 3.17, Transportation of the MND for analysis on these topics.
- P5-3** The commenter's opinion is noted and forwarded to the decision makers for their consideration.
- P5-4** The commenter's opinion is noted and forwarded to the decision makers for their consideration.
- P5-5** For a discussion on impacts relating to noise, please refer to Section 3.13, Noise of the MND.
- P5-6** The comment serves as a conclusion to the comment letter. The commenter's opinion is noted and forwarded to the decision makers for their consideration.

From: [REDACTED]
To: [Yumie Dahn](#)
Subject: Submission on the Tahoe Donner Proposed Ski Lodge expansion
Date: Tuesday, May 30, 2023 4:53:18 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

To: Yumie Dahn
Planning Department
Town of Truckee

From: Adrian Fogg
[REDACTED]

Dear Yurnie,

I would like to submit my opposition to the proposed ski lodge expansion in Tahoe Donner. As a full time resident in Tahoe I'm opposed to this project for the following reasons:

P6-1

i) A survey of all Tahoe Donner homeowners commissioned by the TD board found that the project is not supported by a majority of Tahoe Donner homeowners (January 2022).

P6-2

ii) Two-thirds of the yearly usage of TD's existing 2-chairlift Downhill ski operation comes from the general public and "guests," not Tahoe Donner homeowners like me.

P6-3

iii) The proposed Tahoe Donner lodge is too large and too expensive. The new facility would be 9,000 square feet and 60% larger than the existing ski lodge it would replace. If approved, the 24,000 square feet (ft) ski lodge will cost over \$24 million.

P6-4

iv) All homeowners will be forced into paying higher annual HOA fees because of the project, including some like me who don't want it and will never use it.

P6-5

v) The existing ski lodge has historically operated only in winter, while the proposed larger lodge is designed to serve and operate as a new year-round Four Season Event Center. I'm baffled why the TD Board thinks that our residential community needs to offer a venue for to provide for weddings, banquets and special events.

P6-6

vi) Tahoe Donner does not currently have an enforceable Conditional Use Permit (CUP) to govern the usage of the existing downhill ski lodge nor the much larger proposed lodge.

P6-7

vii) As designed, the new ski lodge would be exempt from the standards, environmental requirements, goals and policies of Truckee 2040, so it is not aligned with the new General Plan recently approved by the Town Planning Commission and City Council.

P6-8

For these reasons I am opposed to the proposed project in its current form.

Response to Comment Letter P6

Adrian Fogg
May 30, 2023

- P6-1** The comment serves as an introduction to the comment letter. The commenter’s opinion is noted and forwarded to the decision makers for their consideration.
- P6-2** The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- P6-3** The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- P6-4** The commenter’s opinion is noted and forwarded to decision makers for their consideration. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- P6-5** The commenter’s opinion is noted and forwarded to decision makers for their consideration. This comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- P6-6** The holding of special events, including weddings, is not included in the existing use category of the project site. Master Response 4: Expansion of Use and Special Events addresses this concern. The commenter’s opinion is noted and forwarded to the decision makers for their consideration.
- P6-7** Refer to RTC O2-2 and Master Response 4: Expansion of Use and Special Permits.
- P6-8** Refer to Master Response 5: General Plan Update.

Yumie Dahn
Community Development Department
Town Of Truckee
10183 Truckee Airport RD
Truckee Ca 96161

Greg McDougall Esq ,
Past President Tahoe Donner Board
[REDACTED]

Truckee Planning Commission/June 20,2023

6/2/23

Re : Tahoe Donner Lodge Application

Unless major changes are made to this application, it should not be approved for the following reasons:

- 1) Tahoe Donner members have voted against this proposal due in part to the extraordinary capital costs and ongoing operating expense. It's sheer size alone is simply far too large for its site and use. At 24,000 Sq Ft and 3 stories tall it is more than 60% larger than the size of the existing building making it the largest and most expensive project ever built in its history. Its design is something no one would want in their neighborhood!
- 2) Notably also requesting winter street parking, the resulting traffic congestion on that hill area will result in significant otherwise chronic overloading and unnecessary hazards to safety vehicles and the public specifically on Slalom, Alder Creek and Snow Peak.
- 3) Instead of simply remodeling this building, or by designing a smaller building with a 2-story height the proposed extensive excavation will significantly affect the water table, homes, and waterways downhill. As a consequence, there is a real risk of flooding, drainage, and wastewater discharge downstream including the condo complex. Sediment laden wastewater will end up running into Alder Creek, a year-round trout stream whose habitat includes federally listed endangered species. Why have none of these important aspects been adequately studies or mitigated?
- 4) As a steward of our environment why would our Town allow an enormous ski lodge for that area to otherwise be exempt from the environmental standards set forth in our new General Plan? Why the special treatment? The environmental analysis and



proposed mitigation measures are wrongfully being based on our Town's General Plan 15 years ago!

- 5) Why has no Conditional Use Permit (CUP) been filed and at least required here when the Town mandated the same for the Alder Creek Lodge in 2014? As a consequence of the permitting process for the Alder Creek expansion, that building had to be downsized from 1 story to 2, equestrian operations were removed offsite, and the parking lot size reduced to protect wetlands.. Equally important the mitigation measures were adopted as part of that facility's "Conditional Use Permit" which among other restrictions eliminated evening operations to protect neighboring residents. Those same conditions remain today.

P7-4
Cont.
P7-5

Thank You,

Gregory S McDougall

Response to Comment Letter P7

Gregory McDougall
June 1, 2023

- P7-1** The commenter's opinion is noted and forwarded to the decision makers for their consideration.
- P7-2** Traffic congestion/level of service (LOS) is no longer considered an environmental impact under CEQA. However, impacts related to transportation are addressed in Section 3.17, Transportation of the MND. As stated therein, the project would include a new circular shuttle drop-off area on Slalom Way that would improve the safety and circulation of vans and buses. Further, a review of site circulation determined that roadway travel lanes and emergency access pathways would remain unobstructed as long as roadway parking is cleared of snow and occurs outside of the designated 24-foot travel way. The proposed project is not designed to increase visitors onsite but to better accommodate the existing operations at the facility.
- P7-3** Refer to Master Response 1: Groundwater and Master Response 2: Surface Runoff and Water Quality, which address concerns related to groundwater and drainage.
- Section 3.4, Biological Resources of the MND presents an analysis on sensitive or special status species and critical habitats located in the project area based on the results of the BRA prepared for the project. Refer to RTC P2-6, Master Response 2: Surface Runoff and Water Quality, and Master Response 3: Sierra Nevada Yellow-legged Frog which explain how surface runoff from the project would not adversely affect fish or wildlife habitat in Alder Creek.
- P7-4** Refer to Master Response 5: General Plan Update.
- P7-5** Refer to RTC 02-2 and Master Response 4: Expansion of Use and Special Events.

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Comment Letter P8

Yumie Dahn

From: Fastdoce [REDACTED]
Sent: Saturday, June 3, 2023 8:28 PM
To: Yumie Dahn
Subject: Tahoe Donner Ski Lodge

You don't often get email from [REDACTED] [Learn why this is important](#)

Ms. Dahn,
I am Edward Littlejohn. I live and own [REDACTED] in Tahoe Donner/Truckee.
PLEASE approve the 10,000 sq. foot new Lodge design. We have needed this for SO long.
Thank you.

┌ P8-1

Response to Comment Letter P8

Edward Littlejohn
June 3, 2023

P8-1 The comment is noted and forwarded to the decision makers for their consideration. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Yumie Dahn

From: EAB [REDACTED]
Sent: Saturday, June 3, 2023 5:21 PM
To: Yumie Dahn
Cc: Adrian Swingler
Subject: Re: Tahoe Donner ski lodge - [REDACTED]

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

[REDACTED]

Sent from my iPhone

- > On Jun 3, 2023, at 5:19 PM, EAB [REDACTED] wrote:
- >
- > Please do NOT approve the Tahoe Donner ski lodge. It is way too big.
- >
- > Tahoe Donner is private, so it is pay up and shut up. I am sure the town can do much better.
- >
- > Sent from my iPhone

┌ P9-1

Response to Comment Letter P9

Eileen Bernhardt
June 3, 2023

P9-1 The comment is noted and forwarded to the decision makers for their consideration. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Yumie Dahn

From: Frank Havlik [REDACTED] >
Sent: Saturday, June 3, 2023 6:35 PM
To: Yumie Dahn
Subject: Support for the new Tahoe Donner Ski lodge

You don't often get email from [REDACTED] [Learn why this is important](#)

As a Tahoe Donner resident, who lives at the top of Skislope Way and actually can see the top of the main lift from his deck, I want to add my name to those who support the new Tahoe Donner Ski Lodge as designed. Honestly, I very rarely use the facility, but when I do I realize that the current lodge is both old, and outdated. I think the current design addresses most of the current shortcomings, along with the ADA issues. While some quibble for a smaller, less expensive facility, the reality is that, not building it correctly the first time will only incur additional costs and inconvenience down the road when it must be upgraded down the road. Better to build it correctly the first time and have another 30-50 years use.

P10-1

Regards,

Frank Havlik
[REDACTED]
Truckee, CA.

Response to Comment Letter P10

Frank Havlik
June 3, 2023

P10-1 The comment is noted and forwarded to the decision makers for their consideration. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Comment Letter P11

Yumie Dahn

From: Joan Bush [REDACTED] >
Sent: Sunday, June 4, 2023 12:22 PM
To: Yumie Dahn
Subject: Tahoe Donner replacement ski lodge

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I live in Tahoe Donner and do not support the huge costly replacement project.

Understand need to replace the old building.

A smaller sized building will suffice. This is a bunny hill. We should not try to compete with Sugar Bowl, etc.

P11-1

Response to Comment Letter P11

Joan Bush
June 4, 2023

P11-1 The comment is noted and forwarded to the decision makers for their consideration. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Yumie Dahn

From: Larry Lunde [REDACTED] >
Sent: Sunday, June 4, 2023 9:17 AM
To: Yumie Dahn
Subject: Vote NO on Tahoe Donner ski lodge

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Please vote NO on the Tahoe Donner ski lodge. It will cause way too much traffic in the area. The loud noise from events planned there will disturb the local residents.

Thank you
Larry Lunde

[REDACTED]
TahoeDoner 96161

I P12-1

Response to Comment Letter P12

Larry Lunde
June 4, 2023

P12-1 The holding of special events is not included in the existing or proposed use category of the project site, please refer to Master Response 4: Expansion of Use and Special Events.

Traffic congestion/LOS is no longer considered an impact under CEQA. Refer to Section 3.17, Transportation and 3.13, Noise of the MND for an analysis on potential transportation and noise related impacts, respectively. The comment is noted and forwarded to the decision makers for their consideration. The commenter does not provide any substantial evidence as to the basis for these assertions; therefore, no further response is required.

Yumie Dahn

From: John Kittock [REDACTED]
Sent: Monday, June 5, 2023 8:40 AM
To: Yumie Dahn
Subject: Planning Commission Meeting - Tahoe Donner Ski Lodge

You don't often get email from [REDACTED]. [Learn why this is important](#)

I respectfully request that the Planning Commission deny the permit to build the proposed Tahoe Donner Ski Lodge until a plan has been approved for the evacuation of Tahoe Donner residents in the event of an emergency. Currently there are limited ways to evacuate from Tahoe Donner. A new ski lodge will only increase traffic and substantially decrease evacuation in the event of an emergency. This proposed ski lodge is not necessary.

P13-1

I am a full time resident of Tahoe Donner and extremely concerned with the welfare of our community. Unfortunately, I am not able to attend the planning commission meeting regarding this matter, and therefore appreciate your attention to this matter.

P13-2

Sincerely

John Kittock
[REDACTED], Truckee, CA 96161

[REDACTED]

Response to Comment Letter P13

John Kittock
June 5, 2023

P13-1 Section 3.9, Hazards and Hazardous Materials and 3.17, Transportation of the MND present analyses on emergency response and evacuation plans. As stated in Section 3.9, the proposed project would comply with General Plan policies for identification of appropriate emergency access routes and would be required to submit project plans for review and approval to ensure that emergency access is sufficient at the site. Further described in Section 3.17, the project would not introduce additional traffic or alter existing emergency access routes that could substantially affect emergency access. Additionally, a review of site circulation determined that roadway travel lanes and emergency access pathways would remain unobstructed as long as roadway parking is cleared of snow and occurs outside of the designated 24-foot travel way. The proposed project would comply with California Fire Code requirements for emergency access which would ensure that the project would not result in new or more severe impacts than what was disclosed in the General Plan EIR.

Traffic congestion/LOS is no longer considered an impact under CEQA. However, please also refer to Section 3.17 for impacts relating to transportation.

P13-2 The comment serves as a conclusion to the comment letter. The comment itself does not raise any specific issues related to the adequacy of the MND analysis.

Yumie Dahn

From: Charles Wu <[REDACTED]>
Sent: Tuesday, June 6, 2023 4:08 PM
To: Yumie Dahn
Subject: Tahoe Donner Planning Commission Meeting

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Mr/Ms Dahn,

After reviewing the current files for the Tahoe Donner Ski Lodge, I object to approval for the following reasons:

┌ P14-1

1) The planning commission will be approving the largest restaurant and bar in Truckee (10,000 sq feet). The current 15,000 2 story building will be replaced by a 24,000 sq ft 3 story building. It's oversized for our residential community and location.

┌ P14-2

2) The facility will cause additional traffic and parking problems for Tahoe Donner, residents, especially for the surrounding neighborhoods and Ski Bowl Condo owners.

┌ P14-3

3) The facility will cause increased noise for residents especially given the amplification due to its position in the ski bowl.

┌ P14-4

3) The below groundwater level excavation required for the 24,000 sf lodge foundation will cause unknown environmental issues as well as potential flooding problems for downstream residents.

┌ P14-5

The Planning Commission should instead require that Tahoe Donner remodel the existing lodge facility or design a smaller 2-story replacement lodge that can better fit the footprint of the existing lodge without significant excavation below the groundwater table.

┌ P14-6

Thank you for this consideration,

Charles C. Wu
Former President of Tahoe Donner Homeowners Association

[REDACTED]
Truckee, CA 94131

Response to Comment Letter P14

Charles Wu
June 6, 2023

- P14-1** The comment serves as an introduction to the comment letter and states the commenter's objection to approval of the proposed project. Specific issues are addressed below.
- P14-2** The comment is noted and forwarded to the decision makers for their consideration.
- P14-3** Refer to Section 3.17, Transportation of the MND for a discussion on transportation related impacts. Traffic congestion/LOS is no longer considered an impact under CEQA. However, as stated in Section 3.17, the project would not introduce incompatible traffic or new road configurations. The project would include a drop-off roundabout that should improve the safety and circulation of vans and buses. Additionally, a review of site circulation determined that roadway travel lanes and emergency access pathways would remain unobstructed as long as roadway parking is cleared of snow and occurs outside of the designated 24-foot travel way. Parking is also not considered a CEQA environmental impact. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- P14-4** Refer to Section 3.13, Noise of the MND for a discussion on noise impacts from the proposed project.
- P14-5** Refer to Master Response 1: Groundwater and Master Response 2: Surface Runoff and Water Quality, which address concerns for flooding.
- P14-6** The comment is noted and forwarded to the decision makers for their consideration.

Yumie Dahn

From: Jeffrey Connors [REDACTED] >
Sent: Tuesday, June 6, 2023 4:03 PM
To: Yumie Dahn
Subject: Proposed Tahoe Donner Ski Lodge

Follow Up Flag: Follow up
Flag Status: Completed

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Ms. Dahn,

I am a former President and Treasurer of Tahoe Donner and a 20+ year resident of Truckee. During my tenure on the Associations Board we had extensive discussions about replacing the existing ski lodge, which approximates 14,500 ft. We discussed various options and alternatives with the net result being to increase the size of the lodge to approximately 16,000 or 16,500 ft. and importantly allow for ADA upgrades. In coming to this conclusion there appeared to be community backing for this size given that the ski hill (where I also taught skiing for several years) was basically a beginner hill and we had been saving in our development fund for its eventual replacement.

P15-1

A few key points for the Planning Commission to think through .

1. Upon leaving the board, the new incumbents very quickly raised the size of the proposed ski lodge to the approximate 23,500 square-foot level and significantly increased the cost estimate while embarking on a course to materially increase the annual association fee which they have been doing now for at least three years.

P15-2

2. Importantly, when the community was surveyed on the updated proposal, approximately 49% of those voting, were not in favor of this size or cost while approximately 39% were in favor. The board then took the unfortunate step of saying those that did not vote were clearly in favor of the larger size and continued to move forward.

3. There never has been any material and thorough analytical reviews of what it would cost to refurbish the lodge. Instead, some cursory analysis were initiated with the outcome being that the only real solution was to be a brand new lodge.

P15-3

4. The proposal before you has many environmental, noise, parking and other related issues. In addition, the board is planning a year-round facility, so that they can hold events like weddings, which were previously done at the restaurant lodge. During my tenure we stopped the weddings because among many things, they were noisy, caused traffic issues and raised lots of issues with the privacy and enjoyment of the many condos who lived next-door to where the weddings were taking place. further various homes were rented and acted as the foundation for party houses.

P15-4

In my opinion it is the intent of management to resume weddings and other types of outward social activities at the ski lodge, which, as you know, is nestled next to an even larger association of condos and homes.

5. The propose building is oversized for tahoe donner and its residences and moves from being two stories to a three-story building, which is unnecessary. Importantly, the plans call for building one of the largest restaurants/pubs in Truckee, which is unconscionable and reflects a design which does not fit with the area. As you are probably aware there are several older downhill ski lodges in the overall Truckee community that with upgrades have stood the test of time.

P15-5

I could continue on, but in summary this project, as currently designed, is absolutely unnecessary. The ownership has voted not to accept the plans which is important for this commission to appreciate. My suggestion would be to send the

P15-6

plans back to the Tahoe Donner Association and ask them to look at a refurbishment of the existing facility in a more reasonable size that fits with the overall environment of tahoe donner .This will also materially reduce all of the construction and closure issues as well as materially reduce the cost which as presented will significantly drain the finances of the Tahoe Donner Association and contribute to the areas growing non-affordability.

↑
P15-6
Cont.

Thank you for listening.

Jeff Connors

[REDACTED]
Truckee, Ca., 96161

Response to Comment Letter P15

Jeffrey Connors
June 6, 2023

- P15-1** The comment is noted and forwarded to the decision makers for their consideration..
- P15-2** The comment is noted and forwarded to the decision makers for their consideration. The comment itself does not raise any environmental issues related to the adequacy of the MND analysis.
- P15-3** The comment does not raise any environmental issues related to the adequacy of the MND analysis.
- P15-4** No substantial evidence for the assertion of noise, traffic, or other environmental issues is provided in the comment. Analyses of potential impacts related to noise and transportation are provided in Section 3.13, Noise and Section 3.17, Transportation of the MND.
- The holding of special events, including weddings, is not included in the existing use category of the project site. Refer to Master Response 4: Expansion of Use and Special Events.
- P15-5** The comment is noted and forwarded to the decision makers for their consideration. Refer to Section 3.1, Aesthetics of the MND for a discussion on potential impacts to visual character of the site.
- P15-6** The comment is noted and forwarded to the decision makers for their consideration.

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Yumie Dahn

From: Laura Rende [REDACTED] >
Sent: Tuesday, June 6, 2023 5:27 PM
To: Yumie Dahn
Subject: Tahoe Donner Downhill Ski Lodge

June 6, 2023

Community Development Department
10183 Truckee Airport Road
Truckee, CA 96161

Truckee Planning Commission:

We have been homeowners in Tahoe Donner since 1999 and are writing to express our strong opposition to the Truckee Planning Commission approving the 60% larger Downhill Ski Lodge. The proposed 24,000 square foot lodge would be the largest building in the Association and is not necessary for the purpose and enjoyment of Tahoe Donner's members and the local community. The prices for the public to ski at the 2-chairlift Tahoe Donner Ski Hill have risen substantially and are currently comparable to other local ski resorts which offer significantly more skiable terrain as well as more accessible transportation and parking options. At three stories high versus the current two, the proposed ski lodge is too large for the location and is likely designed to ultimately accommodate more than ski operations with the absence of a Conditional Use Permit. Most importantly, the excavation could potentially penetrate the multiple lenses of shallow subterranean groundwater and create runoff issues as well as threaten a variety of local wildlife. We are respectfully asking the Planning Commission to holistically consider all of these factors and reject the proposed Tahoe Donner Ski Lodge in its current iteration. We are hopeful Tahoe Donner will work with the Town to develop a downhill ski lodge that is downsized and redesigned to eliminate the significant adverse environmental impact and fit within the community.

┌
├ P16-1
├ P16-2
├ P16-3
└ P16-4

Sincerely,
John and Laura Rende
[REDACTED]
Truckee, CA 96161
[REDACTED]

Response to Comment Letter P16

Laura Rende
June 6, 2023

- P16-1** The comment is noted and forwarded to the decision-makers for their consideration.
- P16-2** Refer to RTC 02-2 and Master Response 4: Expansion of Use and Special Events, which address concerns associated with facility operations and the absence of a CUP.
- P16-3** Refer to Master Response 1: Groundwater and Master Response 2: Surface Runoff and Water Quality, which address all concerns related to groundwater and surface runoff.
- The comment also asserts that excavation could threaten local wildlife but does not provide substantial evidence as to the basis for this assertion. Please refer to Section 3.4, Biology of the MND for analysis on biological resources, including wildlife. Also refer to Master Response 3: Sierra Nevada Yellow-legged Frog.
- P16-4** The comment is noted and forwarded to the decision-makers for their consideration.

Yumie Dahn

From: john maciejewski <[REDACTED]>
Sent: Friday, June 9, 2023 4:21 PM
To: Yumie Dahn
Subject: TDSL

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED] [Learn why this is important](#)

Ali Liptrot
[REDACTED]
Truckee, Ca 96161
[REDACTED]

I recognize that the Tahoe Donner Ski Lodge needs to be replaced but I am opposed to the current plans due to size, cost and environmental impact.

I P17-1

Response to Comment Letter P17

Ali Liptrot
June 9, 2023

P17-1 The comment is noted and forwarded to the decision-makers for their consideration. Environmental impacts of the project have been analyzed in the MND. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Yumie Dahn

From: Jeannette Timmons <[REDACTED]>
Sent: Friday, June 9, 2023 9:04 PM
To: Yumie Dahn
Subject: TD ski lodge replacement

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED]. [Learn why this is important](#)

Yumie Dahn -

I recognize that the Tahoe Donner Ski Lodge needs to be replaced but I am opposed to the current plans due to size, cost and environmental impact.

I P18-1

Warm Regards,
Jeannette Timmons

[REDACTED]
Truckee, CA 96161

Response to Comment Letter P18

Jeannette Timmons
June 9, 2023

P18-1 The comment is noted and forwarded to the decision-makers for their consideration. Environmental impacts of the project have been analyzed in the MND. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Yumie Dahn

From: Ali & John - CALNEV TEAM <[REDACTED]>
Sent: Friday, June 9, 2023 3:37 PM
To: Yumie Dahn
Subject: Anti Current TD Ski Lodge Replacement

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED]. [Learn why this is important](#)

[REDACTED]
Truckee, Ca 96161
[REDACTED]

Unless major changes are made to reduce the size, environmental impacts and cost of the proposed Tahoe Donner Ski Lodge project, its permit application should be denied by the Truckee Planning Commission.

I P19-1



Ali Liptrot & John Maciejewski
Power and Strength of Two

[REDACTED]

CLICK FOR YOUR HOME VALUE

[REDACTED]



WARNING! WIRE FRAUD ALERT! Wire fraud and email hacking/phishing attacks are on the rise. Please do not convey your financial information to me via email. If you receive an email containing Wiring Instructions, DO NOT RESPOND TO THE EMAIL! Instead, call your escrow officer immediately using previously known contact information, and NOT information provided in the email, to verify the information prior to sending funds.

Response to Comment Letter P19

John Maciejewski
June 9, 2023

P19-1 The comment is noted and forwarded to the decision-makers for their consideration. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Comment Letter P20

Yumie Dahn

From: lindsay chan <[REDACTED]>
Sent: Friday, June 9, 2023 3:55 PM
To: Yumie Dahn
Subject: Tahoe Donner Ski Lodge Replacement Project

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Yumie,

Thank you for hearing comments from Tahoe Donner homeowners regarding the ski lodge replacement project. I recognize that the Tahoe Donner Ski Lodge needs to be replaced but I am opposed to the current plans due to size, cost, and environmental impact. This is a small mountain with a specific user base. The inflated plans put forward are unnecessary. Thank you.

┌
P20-1
└

Respectfully,

Lindsay Chan
[REDACTED]
Truckee, CA 96161
[REDACTED]

Response to Comment Letter P20

Lindsay Chan
June 9, 2023

P20-1 The comment is noted and forwarded to the decision-makers for their consideration. The comment does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.

Town of Truckee
Planning/Permit Department
CC Yumie Dahn,

Dear Sirs,

I would like to submit my comments regarding the issuance of a permit for the expansion/rebuild of the current ski lodge for Tahoe Donner. My objections are as follows:

P21-1

1. The proposed rebuild and expansion of the Ski lodge will make it 60% larger than the current lodge, with an expanded foundation size, which requires a substantial increase in depth of the foundation. The NV5 geotechnical report completed in August of 2021 (an historical drought year) showed 3 of 4 cores hit water lenses/tables at 6-10 ft down. The proposed foundation will require excavation of ~10-12 ft down into the hillside, and the effects of this are not adequately addressed in the Geotechnical report. If the same coring were conducted this year, there would be a substantial difference in the water table, and lenses for water drainage. This could affect moisture levels and drainage for the ski bowl condos. (See section 6.1.7 of the NV5 report that states that there is no groundwater flow analysis that has been performed) Any remediation for construction site dewatering would need to be monitored by NV5 per their recommendation, and would potentially require a substantially more robust drainage plan, and dewatering for the site during construction than what is proposed in the geotechnical report, and the addendum submitted.

P21-2

Additional work in the form of 10-14 ft depth boreholes and a groundwater subsurface flow analysis need to be completed to understand the existence of groundwater flows. The need for this would be alleviated by elimination of the plans to move the 3rd story of the building towards the Eagle Rock lift. Whatever mitigation plan that is proposed by Tahoe Donner should ensure that there is no future issues with drainage/mold/mud to the Tahoe Donner Ski bowl condo owners. If there is a potential for excess surface and subsurface water above and beyond what is existing that may affect the condo owners/buildings, it should be thoroughly studied and mitigated to avoid costly remediation in the future.

2. There is no existing conditional use permit for the ski lodge, and although we are assured that there will be no additional attendance, or usage of the proposed facility, the increase in size and the large addition of dining facilities means that this would easily lead to increased usage above and beyond what is current usage due to financial reasons. Rather than relying on the "good faith promises" of the current board, the current usage should be documented, and codified before the project should proceed. Any additional usage should require an additional permit, and would impact the neighborhood and traffic patterns for the development, bringing in additional traffic and creating parking issues.

P21-3

- 3. Projected attendance for the larger facility is up to 1700 persons for weekends. ([Ecosign-Report-for-Tahoe-Donner-2018-04-24.pdf \(tahoedonner.com\)](#)) See page II-12. The 2 lift ski hill has a skier capacity of 1980 people according to studies completed by Ecosign, page II-7. Parking for the ski lodge and within Tahoe Donner is shown on page II- 26-29 and table IV-15. Parking at the Ski lodge itself is 328 slots, (excluding employee parking) with additional spots within Tahoe Donner and utilizing TD shuttles of an additional 133 slots, for a total parking capacity of 462 slots. Assuming 3 persons per car, this gives a parking capacity of approximately 1375 skiers. The balance of 325+ persons will need to be shuttled from overflow parking external to Tahoe Donner creating additional trips for the neighborhood. Microtransit and additional shuttles will help, but the additional traffic will create issues within the residential areas, and create more pollution, etc. P21-4

- 4. Additional employees are not projected for a facility that is 9,000+ sqft more than the existing lodge. This is not realistic, and will exacerbate issues with affordable housing for employees, which is a pressing need for the Town of Truckee. This is a problem for the whole ski industry, with Pallisades, Northstar and Sugar bowl adding affordable housing by buying units. Yet Tahoe Donner is not projecting additional employee housing needs? P21-5

- 5. The current Ski Lodge permit application conforms to the 2025 general plan for Truckee, adopted in 2008 and the permit application refers to the 2025 standards extensively. The Tahoe Donner board has now announced that the lodge will now not be built until 2024 at the earliest. Since the permit has not been approved, I believe that the new lodge should conform to the Truckee 2040 plan, with it's different requirements, and the permit application should be rewritten to use those standards. P21-6

These are some of the reasons that I object to the project as envisioned. Rather than the 60% expansion that is requested on the permit application, the project should be downsized and foundational drainage and excavation limited, parking and traffic issues re evaluated, and additional employee housing provided for the project. There should also be a CUP rewritten for the project so that usage is on record for the facility. P21-7

Thank you for your consideration,
Cheryll Cross
Tahoe Donner full time resident
Truckee full time resident since 1991

Response to Comment Letter P21

Cheryll Cross
June 11, 2023

- P21-1** The comment serves as an introduction to the comment letter. The comment itself does not raise any specific issues related to the adequacy of the MND analysis, and no further response is required.
- P21-2** Refer to Master Response 1: Groundwater.
- P21-3** Refer to RTC O2-2 and Master Response 4: Expansion of Use and Special Events, which address concerns associated with facility uses and absence of a CUP. Traffic congestion (LOS) and parking are not considered environmental issues under CEQA. Refer to Section 3.17, Transportation of the MND for a discussion of transportation impacts.
- P21-4** Traffic congestion (LOS) and parking are not considered environmental issues under CEQA. Additionally, there would be no changes to existing shuttle operations. Refer to Section 3.17, Transportation of the MND for a discussion of transportation impacts.
- P21-5** As discussed in the MND, the replacement ski lodge is intended to provide improved facilities and services to serve existing demand. There would be no operational changes and therefore staffing levels are anticipated to remain the same.
- P21-6** Refer to Master Response 5: General Plan Update.
- P21-7** The comment is noted and forwarded to the decision-makers for their consideration.

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Yumie Dahn, AICP
Senior Planner
Community Development Department
10183 Truckee Airport Road
Truckee, CA 96161

June 12, 2023

Subject: Tahoe Donner Ski Lodge IS/MND Public Review Draft

Dear Ms Dahn:

Please accept the following comments concerning the IS/MND Public Review Draft for the Tahoe Donner Ski Lodge project. I have been a Tahoe Donner (TD) homeowner for the past 10 years, but my family built a vacation home in TD in 1973. So my roots in this area date back to the early days before Truckee incorporated. I favor building a new and modern lodge facility that complies with ADA requirements and is incrementally bigger. But I do not support building an oversized facility designed to operate as a Four Season Event Center. So, unless changes are made to the proposed mitigation measures (MM), plus the facility design modified and operational uses of the proposed ski lodge greatly limited, I urge that action on the proposed project be postponed.

P22-1

1) The size of the proposed facility is too big and inappropriate for the site where it would be built, potentially causing environmental impacts during construction and to the TD community from the Four Season Event Center operations and uses it has been designed to accommodate and host. At 24,000 square feet (sf) in size and 3-stories tall, this will be the largest and most expensive capital project ever built in Tahoe Donner. It would be 9,000 sf and 60% larger than our existing 2-story ski lodge. This massive size increase is not justified solely to accommodate "peak crowd" days during the 4-month ski season at TD's modest, 2-chairlift ski hill. Other ski resorts throughout the Truckee and Tahoe area successfully manage much larger peak crowds by implementing other operational measures that Tahoe Donner should consider.

P22-2

Because of these issues, as well as concerns over the extraordinary capital costs and ongoing operating expenses, the project has divided the Tahoe Donner community. This was confirmed by the results of a homeowner survey about ski lodge project conducted by the HOA last year.

P22-3

2) As designed, the proposed project requires extensive excavation and grading of the project site to depths of 12' to 13' below the ground surface for the foundation and footprint. I am concerned this risks harming the shallow water table at the building site, creating a flooding risk. Remediation could require pumping out the excavation pit and disposal of unknown quantities of sediment-laden waste water. I and others are concerned that gravity flows of this waste water will end up running downhill through the Ski Bowl Condo community, draining into Alder Creek. It is year-round trout stream and habitat for a sensitive species.

P22-4

The potential flooding and water quality impacts have not been adequately studied to be properly mitigated. Preparation of a "Dewatering Contingency Plan" proposed in MM-HYD-1

will be inadequate because it fails to require that new bore holes be dug at the project site to determine the depth, presence and extent of shallow groundwater flows below the ground surface where excavation activities and grading are planned. MM-HYD-1 is also flawed because it fails to require consideration of a redesign that achieves a smaller building footprint with less excavating and grading needed for the foundation.

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P22-4
Cont.

When the NV 5 firm prepared its Geotechnical Study of the project site in late summer 2021, groundwater was encountered at depths of 6' to 10' in 3 of the 4 bore holes dug. That was during a drought year preceded by a winter with below average snowfall. Unless the depth and extent of existing and likely groundwater flows that will be impacted from excavating and grading 12 to 13 feet below the ground surface are identified and assessed following an average or above-average snowfall winter, the potential volume of water discharges needing to be managed during construction and afterward is unknown. Currently, snowmelt runoff from the existing TD ski hill and Ski Bowl Condo complex is channeled to flow by gravity into Alder Creek and has been documented. I am concerned that uncontrolled and mismanaged flows of groundwater impacted by excavation and grading work could similarly drain into Alder Creek.

P22-5

3) I am also concerned that this project is being given preferential treatment in this permitting process. The project is being exempted from the environmental standards of the Truckee 2040 General Plan update that was recently approved by the Planning Commission and Town Council. Instead, the environmental analysis and mitigation measures proposed for the Tahoe Donner ski lodge project are based on the previous EIR prepared for the Truckee General Plan update adopted over 15 years ago (Truckee 2025). When the commission and council approved the Truckee 2040 update last month, was there an explicit exemption of TD's ski lodge project included as part of the approval votes?

P22-6

The Business Plan Pro Forma prepared by TD's architects for this project calls for the facility to be commercially operated year-round as a Four Season Event Center. In addition to functioning as a day lodge during the ski season, it is design to be a venue to stage 27 weddings, banquets and other special events in the first year, plus to house a new Mountain Bike Park and Adventure Park operations from Memorial Day through October. TD homeowners are concerned these activities would exacerbate traffic congestion problems on Northwoods, Alder Creek Road and Slalom. When the existing offsite parking lots are filled to capacity, it leads to more vehicles parking along the residential streets of Slalom and Snowpeak. That happens during winter when the TD ski lifts are operating and existing offsite parking lots become full. There may also be nuisances to the Ski Bowl Condo complex and surrounding single family homeowners from lighting, noise, and traffic during Four Season Event Center operations

P22-7

4) I also do not understand why the Town does not require the project applicant to concurrently apply for and obtain a Conditional Use Permit (CUP) like Tahoe Donner did when construction of the Alder Creek Adventure Center (ACAC) was approved in 2014. However,

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P22-8

no enforceable CUP exists today for the current TD ski lodge facility and none being required to operate the much larger replacement structure that is designed to operate year round. The entire third floor is a 10,000 sf dining, bar and kitchen space, making the largest restaurant facility in Tahoe Donner if not the Town of Truckee . Would the Town ever authorize construction and operation of a new 10,000 sf dining and bar facility elsewhere in Truckee without it complying with the recently updated General Plan and a Conditional Use Permit?

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P22-8
Cont.

During the Town's permitting process for construction of the ACAC, the project was modified and downsized from 2-stories to 1-story, equestrian operations moved offsite, and the parking lots reduced to protect the surrounding wetlands. Equally important, there were mitigation measures adopted as part of the ACAC's Conditional Use Permit (CUP) to limit evening operations and protect the surrounding neighborhood residents from traffic, light pollution and loud music nuisances. These measures remain in force today. Similar use restrictions must be made a condition of Town approval for construction of a new ski lodge and made enforceable through a CUP. Allowable uses should be limited to the ski hill's daytime operations in winter and to support kids camp operations in summer.

P22-9

5) It is unfortunate that the deadline for public comments is Sunday, June 18th. That's only 2 days before the Planning Commission (PC) hearing scheduled for June 20th. And it's just 5 days after transmittal of the staff report to the commission on June 15th. Does 48 hours really provide adequate time for Town staff and commissioners to review and consider all public comments? The process is being rushed with the outcome appearing to be predetermined.

P22-10

Three weeks ago, TD announced that start of lodge construction is being postponed a year, to May 2024. So there is no longer any urgency to rush the process. There's time for the project to be reevaluated, redesigns to be developed, its environmental impacts to be mitigated, plus operational impacts on the community addressed before project approval. It is unfortunate that the planning commission is holding a hearing June 20. For all these reasons, I urge the Planning Commission to postpone action on issuing a Building Permit for the project.

P22-11

Thank You,



JEFF SHELLITO
██████████
Truckee, CA 96161
██████████

Yumie Dahn

From: Jeff Shellito [REDACTED]
Sent: Tuesday, June 13, 2023 8:38 AM
To: Yumie Dahn
Subject: RE: My comment letter on the IS/MND for the proposed Tahoe Donner ski lodge project
Attachments: TD-Pro-Forma_FINAL_04-26-2021.pdf; graphic showing ski lodge project excavation perimeters and depth.png; TD ski lodge kitchen design.jpg

Hi Yumie:

The attached should have accompanied my comment letter I submitted yesterday. I forgot to include the Business Plan Pro Forma that was developed by Bull, Stockwell, Allen architects presented to the TD Board of Directors and Community in late April 2021. It outlines a variety of year round activities, uses and commercial operation options that a replacement ski lodge between 22,000 sf and 26,000 sf in size could host and accommodate as a Year Round Event Center, addition to 4-months winter use as a day lodge for downhill skiing.

P22-12

I'm also attaching a graphic from the Preliminary Drainage report prepared by Auerbach Engineering showing the two areas to be excavated 12' to 13' feet deep below the ground surface. Lastly, I enclosed the 3rd floor design for what appears to be a 10,000 sf restaurant and bar.

P22-13

Please include this material as part of the Thursday staff report to be provided to Planning Commission members. Will this staff report be publically available either hard copy or via email when it goes to the commission? If so, I would greatly appreciate receiving a copy.

P22-14

Thank you.

Jeff Shellito
[REDACTED]
Truckee, CA 96161
[REDACTED]

Response to Comment Letter P22

Jeff Shellito
June 12, 2023

- P22-1** The commenter's opinions are noted and forwarded to the decision makers for their consideration. Specific issues are addressed below.
- P22-2** The holding of special events is not included in the project site's existing use category. Refer to Master Response 4: Expansion of Use and Special Events.
- The commenter recommends that Tahoe Donner implement operation measures used by other resorts in the area. No specific operational measures are stated. The commenter's opinions are noted and forwarded to the decision makers for their consideration.
- P22-3** The comment is noted and forwarded to the decision makers for their consideration.
- P22-4** Refer to Master Response 1: Groundwater, Master Response 2: Surface Runoff and Water Quality, and Master Response 3: Sierra Nevada Yellow-legged Frog.
- P22-5** Refer to Master Response 1: Groundwater and Master Response 2: Surface Runoff and Water Quality.
- P22-6** Refer to Master Response 5: General Plan Update.
- P22-7** Refer to Master Response 4: Expansion of Use and Special Events. Traffic congestion/LOS and parking are not considered environmental issues under CEQA. Refer to the MND for analysis of transportation, lighting, and noise impacts.
- P22-8** Refer to RTC 02-2 and Master Response 4: Expansion of Use and Special Events.
- P22-9** Refer to RTC 02-2 and Master Response 4: Expansion of Use and Special Events.
- P22-10** The Town has reviewed and considered comments on the MND prior to deciding the approval of the proposed project, which has been delayed from the original Planning Commission hearing scheduled for June 20, 2023.
- P22-11** The comment is noted and forwarded to the decision makers for their consideration.
- P22-12** The comment is noted and forwarded to the decision makers for their consideration.
- P22-13** The comment is noted and forwarded to the decision makers for their consideration.
- P22-14** The comment is noted. All comment letters will be provided to the Planning Commission. Planning Commission Agenda materials will be available prior to the meeting per normal Town practices and the requirements of the Brown Act.

Yumie Dahn

From: [REDACTED]
Sent: Tuesday, June 13, 2023 7:39 PM
To: Yumie Dahn
Subject: Tahoe Donner Ski Lodge - Proposed Expansion

Follow Up Flag: Follow up
Flag Status: Flagged

Following are my comments regarding the proposed Tahoe Donner Ski Lodge expansive.

Yumie Dahn, AICP
Senior Planner
Community Development
10183 Truckee Airport Road
Truckee, CA 96161

June 12, 2023

Subject: Tahoe Donner Ski Lodge Is/MND Public Review Draft

Ms. Dahn

As a Past President of the Tahoe Donner Association, I am here-by submitting my objections regarding the issuance of a permit for the expansion of the current Ski Lodge for Tahoe Donner. To be right up front, I am asking that the Town of Truckee not allow any expansion. Better yet, do what you can to require/encourage a remodel of the existing facility. Increasing its size will be detrimental the neighbors, and the environment now and the future.

P23-1

My objections are as follows:

The Ski Hill is the association's cash cow which is what motivates the Board's attempt to expand the Ski Lodge to 2,400 square feet. As such I question the honesty of the information provided by the Association as well as what their end goal is for the project. The reality is that the Ski Hill is not really the member amenity they would want you to believe. It is actually a commercial venture or business, which grosses approximately \$500,000 a year. This is important because the "profits" are used to offset the losses of the golf course, dining facilities, Association Management, etc. The commercial nature of the Ski Hill is what drives the design of the building and its size. The exact ratio of member vs. non-member usage is information that is tightly held by Association management and has not been openly provided to the membership. Insiders who are knowledgeable of the Ski Lodge expansion indicate that about 40% of the \$5,000,000 in revenue comes from non-members, i.e., the general public. Your approval of the expansion of the Ski Lodge will open a Pandora's Box that will result in more applications for land usage that will have an even greater impact on the local environment for years to come. The real solution to the idea that the Ski Lodge is too small is to limit non-members use of the Ski Hill.

P23-2

As I indicated above, the size of the project and what I believe is the underlying motive, will negatively impact the roads, neighborhoods, and the environment well beyond what they currently endure. The impact of this project will plague us well into the future. Parking is already a major problem. The fact is that there isn't enough parking now let alone in the future. The Town of Truckee already appears to allow (or ignore) on-street parking contrary to the limitations imposed on the rest of the town during winter months, to accommodate the ski hill. Cars litter the surrounding streets making driving on icy streets dangerous. Traffic is a zoo and negatively affects the public streets as well as the neighboring Ski Bowl Condo complex.

P23-3

Gratefully, my house is nowhere near the Ski Hill. Wintertime noise around the Ski Hill is already a significant problem for those that live nearby. It can only get worse as the number of skiers increases. I also predict that the Association will next attempt to turn the Ski Hill into a summer entertainment venue, using the "bigger and better Ski Lodge", as a drawing card for events such as music festivals.

P23-4

Based on my personal knowledge of the Board of Directors for Tahoe Donner, you should also expect that they will eventually try to utilize this facility for weddings and conference facilities. The size of the current design plans certainly

bears that out. Please note that in the past, weddings regularly exceeded noise restrictions. While not specifically part of the Ski Hill project, short term rentals will also increase the number of loud weekend house parties at houses rented by wedding party members.

↑ P23-4
Cont.

Membership opinion.

The following may not have any bearing on your actions or decision, but I believe it goes to the motives and long-range plan of the Association's Board of Directors. This was demonstrated when Association members were surveyed on the updated Ski Lodge proposal. Approximately 49% of those voting were not in favor of the project. Only 39% said they favored it. In their true manipulative manner, the Board of Directors declared that "the remaining 12% that did not provide an opinion, were clearly in favor of a larger Ski Lodge." The Board then continued to move forward.

↑ P23-5

Thank you for your consideration,

James Kelly
Former President, Tahoe Donner Board of directors

[REDACTED]
Truckee, CA 96161
[REDACTED]

Response to Comment Letter P23

James Kelly
June 13, 2023

- P23-1** The commenter's opinion is noted and forwarded to the decision makers for their consideration. Specific issues are addressed below.
- P23-2** The comment is noted and forwarded to the decision makers for their consideration.
- P23-3** Traffic congestion (LOS) and parking are not considered environmental issues under CEQA. Refer to Section 3.17, Transportation of the MND for a discussion on transportation impacts.
- P23-4** The holding of special events is not included in the existing or proposed use category of the project site. Refer to Master Response 4: Expansion of Use and Special Events. Additionally, refer to Section 3.13, Noise of the MND for a discussion on noise impacts from the project.
- P23-5** The commenter's opinion is noted and forwarded to the decision makers for their consideration.

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Yumie Dahn

From: [REDACTED]
Sent: Wednesday, June 14, 2023 11:38 AM
To: Yumie Dahn
Subject: Comment regarding the Tahoe Donner Downhill Ski Lodge IS/MND Public Review Draft

Follow Up Flag: Follow up
Flag Status: Flagged

My name is Karin Ludwig. I live part-time at the Tahoe Donner Ski Bowl Condo Association [REDACTED] My mailing address is [REDACTED]. My phone # is [REDACTED].

P24-1

My immediate concern, which I would like to have publicly shared, is that I wish to have confirmation that the new Ski Lodge will not receive approval for use other than defined according to the Letter of Justification, Section 6 (a). Proposed Use – Type of uses and business, including hours of operation.

The existing use of the site is the location of the current Tahoe Donner Association (TDA) downhill ski area day lodge used to accommodate all support services for Tahoe Donner’s Downhill Ski Area operation. More specifically, the existing use of the Tahoe Donner downhill ski lodge and ski area site is separated by seasons as follows:

- Winter months (November through April): o Ski Resort operates daily from 8 a.m. to 5 p.m. Services include equipment rental, retail sales, ski school, ticket sales, shuttle service, bar and food and beverage. Community ski[1]related events happen throughout the season, which might fall out of normal operating hours (example: annual new years eve celebration). o Ski Operations included chair lifts, conveyor lifts, snowmaking, snow removal and grooming operations that happen throughout the day and night.
- Summer Months (May through October): o Day camps that operate 9 a.m. to 4 p.m. daily throughout the summer. o Office space where daily work of the association is performed. o Summer maintenance of building, ski lifts, equipment and trail maintenance is performed.

P24-2

There has been discussion that the new ski lodge will also accommodate large dining/social events; i.e. weddings, concerts, etc. This is not approved under the description in the Letter of Justification. I would like assurances that such events are not and will not be approved by the Town of Truckee and its permit process.

P24-3

Thank you,
Karin

Response to Comment Letter P24

Karin Ludwig
June 14, 2023

- P24-1** The comment serves as an introduction to the comment letter.
- P24-2** Comment describes current use of the project site. Comment noted.
- P24-3** Special events such as weddings and concerts are not part of the existing or proposed use category.
See also Master Response 4: Expansion of Use and Special Events.

From: [Patricia Schifferle](#)
To: [Daniel Fraiman](#); [Coral Cavanagh](#); [David Gove](#); [Mitch Clarin](#); [Sami Taylor](#)
Cc: [Yumie Dahn](#); [Jen Callaway](#); [Jenna Gatto](#)
Subject: Comments Re Resolution 2023-10 & Mitigated Negative Declaration (MND), Tahoe Donner Downhill Ski Lodge
Date: Sunday, June 18, 2023 8:22:46 PM
Attachments: [Exhibit 1 Town of Truckee PRA Re TDA Downhill Lodge April 2022.pdf](#)

Dear Planning Commissioners:

Please accept these comments regarding the Initial Study/Mitigated Negative Declaration (State Clearinghouse #2023050519), Item 9.1:Tahoe Donner Downhill Ski Lodge (Planning Application 2022-0000071/DP-MUP; 11585 Snowpeak Way (also addressed as 11603 Snowpeak Way), 14943 Slalom Way, 12250 Viking Way, 14942 Slalom Way; APNs 046-250-009, 046-050-002, 046-050-001, and 046-040-002)

I urge the Planning Commission to delay adoption of Resolution 2023-10, the Initial Study/Mitigated Negative Declaration (State Clearinghouse #2023050519), the Development Permit, and the Minor Use Permit until all the impacts from the project are evaluated and disclosed and the public is afforded an opportunity to see and comment on outstanding project impact elements. The project will construct a three-story lodge with roughly 10,000 square feet of food and beverage space for a facility that operates approximately four months out of the year until 5pm, with some additional day camp usage for three months operation until 4pm. The impact elements include a yet to be disclosed site dewatering plan; air quality mitigation plan, and impacts to the residents from roughly 400 dump-truck trips hauling materials from the 12 to 13 feet deep site excavation while operating heavy equipment and dewatering pumps.

P25-1

Perhaps there is one thing most people can agree on—the Tahoe Donner Downhill Ski lodge, with original operations permitted in 1972 at a real estate office at the present location with serial building permit changes, needs to be replaced. And perhaps we can all agree that conserving Truckee’s natural resource capital requires the most up to date and accurate assessment of the impacts from such a project is essential especially given our changing climate and predicted weather extremes.

As Planning Commissioners your advice and counsel to the Town Council needs to be based on accurate information and achieving the Truckee General Plan vision. As part of achieving that vision, I urge you to insist the project be analyzed and modified to achieve the 2040 General Plan vision as one of the project alternatives to be considered by the Planning Commission at a later meeting. This information would allow you to consider an alternative that meets the current adopted general plan and its blueprint for balancing the needs of adjacent residents with TDA’s development desires. The argument that this project ought to be shoehorned in under a decade old general plan and environmental impact report because the application was deemed complete in August 2022, artificially limits your advice and counsel to the Town of Truckee to out of date planning goals, stale data, and incomplete analysis of the specific environmental impacts of this project.

P25-2

Please demand the Tahoe Donner Association (TDA) provide truthful and accurate analysis with the opportunity for public comment: The MND should be withdrawn and redone to include a complete environmental impact report. After 3 years of drought and the driest year in California record, TDA consultants conducted biological assessment surveys (Sept 2022), drainage analysis (December 2022) and groundwater investigations (December & November 2021). These reports, along with adherence to vague mitigation measures tiered from the 2015 General Plan environmental impact report, has led to claims of no impact from the project. According to Tahoe Donner’s analysis there will be no impact to residents 20-34 feet away from project operations and construction. And, after subsequent plans and studies that have not been disclosed for public comment, claim there will be no impact from dewatering pumps, groundwater collection and

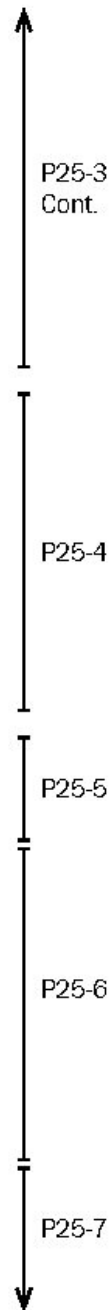
P25-3

treatment discharges, air quality and noise to the surrounding residents, discharges to Alder Creek, traffic congestion, parking, and fire emergency access. The noise, traffic, lighting, and dewatering from the project was determined to have no impact on Northern Goshawk breeding and nesting, which occurs typically in the adjacent areas from March to August, because the surveys were done in October. Rare plants also were not found during this record dry period in October. And no drainage in existing swales was found in December 2022. And according to a Geo Tech report conducted in November and December 2021, soils were not found to be saturated and yet 3 out of 4 bore holes were found to have water even during this exceptionally dry measuring period.

The staff report notes *"Identified potential significant environmental impacts include air quality, biological resources, and hydrology and water quality. However, the Town has incorporated mitigation measures to reduce or eliminate the potential impacts. Mitigation measures have been developed for inclusion within the project as conditions of approval to mitigate all potentially significant impacts to less than significant levels."* Without accurate data and information this conclusion is not supported by the facts.

Further this project admittedly does not have a conditional use permit. As Planning Commissioners, please determine how such mitigation measures, that are typically enforced by a conditional use permit, will be enforced for this project where there is no conditional use permit to enforce. The Town staff provided a record of the permits for this APN and associated APNs for this project [See attachment 1]. The record shows no conditional use permit, but rather a series of building permit changes. A conditional use permit is needed for this project to ensure that the opinions of the public and nearby property owners are considered along with significant impacts on the environment before the development and minor use permit and lot line adjustments are approved. A conditional use permit is also needed to ensure mitigation measures can be enforced. It is likely that noise, dust, odors, and other nuisance and undesirable characteristics will result from both the construction and operation of the project, although these impacts are not disclosed nor analyzed in specific detail in the mitigated negative declaration. Instead TDA declares adherence to a decade old general plan and environmental review to mitigate these specific project impacts all while not producing a valid conditional use permit for the existing ski hill lodge.

Require TDA to evaluate and disclose a comparison of environmental and residential impacts from a smaller less damaging project. Constructing a three-story downhill lodge with roughly 20-foot setbacks from existing condo residential property lines and with an emergency vehicle access road that is only 20 feet wide is likely to cause nuisance and safety risks that have yet to be disclosed or evaluated. Existing adjacent property owners already report groundwater seeping into their basements. The impact to adjacent properties from excavating ten to twelve feet down with another foot or so for drains to shunt groundwater away from the proposed building have not been disclosed. The volume and quality of water from the subsurface drainage and associated dewatering from the construction site have not been disclosed. Where and how this water will be treated on-site is equally unknown. Under Lahontan Basin Plan rules discharges to Alder Creek are prohibited. Potential exemptions from this prohibition require consideration of alternatives that have less impact. TDA claims, without mapping of the 100-year flood plain, that the proposed project does not encroach on or disturb the aquatic resources, the eastern wetland swale or the 100-year flood plain (pg 31 MND). This conclusion is based upon a decade old general environmental review for the Truckee 2015 General Plan that never considered TDA would request approvals for a downhill lodge that is almost double in size. And yet, a reduction in the size of the facility would meet the project needs and reduce the amount of dewatering and other environmental impacts. This alternative is feasible given the similar size and level of service at downhill facilities such as Donner Ski Ranch and Soda Springs, where more guests are served with much smaller lodges. The design of the proposed improvements is likely to cause substantial environmental damage and avoidable injury to fish and wildlife or their habitat. This area is a well-used wildlife migration corridor. The mountain yellow-legged frog has been found three miles downstream in Alder Creek, and the area



has been designated a Goshawk Protected Activity Center.[See The USDA Environmental Assessment Alder Creek Project March 2006 See https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_028019.pdf]. Please request a comprehensive analysis of how a lodge with less excavation, less water quality impacts, and a smaller size could equally meet the needs of TDA development plans.

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P25-7
Cont.

Require TDA to analyze the environmental impacts from the entire project rather than chopping it up. In addition to the lodge reconstruction permit application, TDA has filed a separate application for an essential Lot Line Adjustment (LLA) for the project. This lot line adjustment and moving the replacement building was excluded from the MND. This lot line adjustment is essential for the project to comply with the building coverage requirements in the Town Development Code. Without it the project would not comply with the General Plan and Development Code so this action is essential to the whole project. The environmental impact of this lot line adjustment and expansion of the parcel to allow for a larger building reconstruction needs to be analyzed and disclosed in the MND environmental review.

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P25-8

Thank you for the opportunity to comment. The flaws in the MND and failure to disclose all the needed mitigation along with outstanding dewatering, air quality and transportation impact plans can be remedied best by a delay in the Planning Commission action on this project and a recirculation of the environmental review documents. TDA has announced they will wait until next year before commencing the project, so there is ample time to get such a large impactful project done right with full consideration of residents' concerns, a consideration of alternatives along with ensuring safe emergency vehicle access to the newly constructed downhill lodge.

↑
P25-9

Patricia Schifferle
Director
Pacific Advocates
██████████
Truckee Ca 96161
██████████

From: Elizabeth Morrill <emorrill@townoftruckee.com>
Sent: Wednesday, April 13, 2022 4:31 PM
To: [REDACTED]
Subject: RE: Public Records Request

Good afternoon,

I have updated the Dropbox folder with additional files:
<https://www.dropbox.com/sh/t5w3quwqsr3tebk/AACuLd16GuYaoTjOaolavqvUa?dl=0>

We believe these records satisfy your request, but again this was a rather large request, so if you believe there are additional files or have something specific you are looking for that you do not see in these files, please let me know.

Thank you,

Elizabeth Morrill
Administrative Technician - Records
Office of the Town Clerk
Town of Truckee
(530)-582-2478

From: Elizabeth Morrill
Sent: Friday, April 8, 2022 10:42 AM
To: Patricia Schifferle [REDACTED]
Subject: RE: Public Records Request

Good morning Patricia,

I am working on gathering these records for you. I have created a Dropbox folder where I have placed the records I have found thus far (the link will expire in 30 days):
<https://www.dropbox.com/sh/t5w3quwqsr3tebk/AACuLd16GuYaoTjOaolavqvUa?dl=0>.

There are several folders of building records which encompass the APNs you specified in your request, along with addresses that correspond to the "TAHOE DONNER SKI BOWL CONDOMINIUMS", and the "TAHOE DONNER LODGE CONDOMINIUMS" and the area you described in the subdivision map. I have highlighted the addresses on the screenshot below I believe fit this description, please let me know if this corresponds to the properties you are interested in. I have omitted building plans and structural calculations that are protected under CA law and can only be duplicated with permission from the current owner and the licensed professionals that signed the plans. If you would like, we can arrange for you to view them in person at Town Hall, but they cannot be copied or photographed.



I have included some planning records as well as our copy of the Subdivision map you requested. Please note this may not be the most up to date Subdivision Map, as these are kept by the Nevada County Recorder's Office. I will reach out to our Planning Dept. to see if there are any additional records responsive to your request.

As far as the original conditional use permit issued for the Tahoe Donner Association Downhill Ski Lodge, we are having difficulties locating this document. This would have been issued by Nevada County and they would have transferred these records to us at the time of incorporation. We have been asked about this permit recently, and our planner has responded as follows: "Since we didn't find the actual permit for the building/site, I can't say for sure exactly what kind of permit would have been required by Nevada County when the downhill ski lodge was originally approved. Based on permits we found for other Tahoe Donner uses, it is likely that a Conditional Use Permit would have been required originally. It appears that a Conditional Use Permit was required for an addition to the building, which indicates that a Conditional Use Permit."

This is quite a voluminous request, if there is anything you are looking for that you do not see in the files I have shared, please let me know. I will keep you updated as we find more records and update the Dropbox folder.

Kind regards,

Elizabeth Morrill
Administrative Technician - Records
Office of the Town Clerk
Town of Truckee

(530)-582-2478

From: Patricia Schifferle [REDACTED]
Sent: Wednesday, April 6, 2022 2:00 PM
To: Records <records@townoftruckee.com>
Subject: Public Records Request

Dear Town of Truckee:

I would like to review and inspect these files and any building permits issued from 1971 to present.

I understand these may be on microfiche. Please let me know a time when I can inspect these records. And I would like to obtain a copy of the original Conditional Use Permit issued for the Tahoe Donner Association Downhill Ski Lodge.

These are the specific documents I would like to inspect all permits, records and correspondence relating to:

1. Tahoe Donner Association Downhill Ski Lodge 11603 Slalom Way also known as 11603 Slalom Way or 11603 Snowpeak Way and 16363 Skislope Way; APNs 046-250-009, 046-250-007, and 046-250-005
2. A copy of Book 4 Subdivision Maps at Page 25 August 11, 1971: UNIT 3: A portion of Parcel R ("Ski Area Day Lodge") of Unit 3, as shown on the Official Map thereof, filed in the office of the Nevada County Recorder, on August 11, 1971, in Book 4 of Subdivision Maps, at Page 25.
3. "TAHOE DONNER SKI BOWL CONDOMINIUMS", and the "TAHOE DONNER LODGE CONDOMINIUMS", all real property lying within the unincorporated territory of Nevada County, California, and situate in Section 1, Township 17 North, Range 15 East, M.D.B. & M., and more particularly described as Lot 64 and a portion of Parcel R of Tahoe Donner Unit 3 as said lot and parcel are so designated and shown on the Official Map thereof, filed in the office of the Nevada County Recorder, on August 11, 1971, in Book 4 of Subdivision Maps, at Page 25.

Thanks,

Patricia Schifferle
[REDACTED]
Truckee Ca 96161
[REDACTED]

Response to Comment Letter P25

Patricia Schifferle
June 18, 2023

- P25-1** The comment is noted and forwarded to the decision-makers for their consideration. MM-HYD-1 in the MND requires preparation of a dewatering plan, in addition to the Stormwater Pollution Prevention Plan that is required by the Regional Water Quality Control Board. MM-AQ-1 through MM-AQ-3 mitigate project air quality impacts through measures recommended by the air district. Section 3.3, Air Quality of the MND includes construction truck trips in the analysis of air quality impacts.
- P25-2** Refer to Master Response 5: General Plan Update.
- P25-3** The comment suggests that the MND and technical reports prepared for the project do not provide a truthful and accurate analysis of potential environmental impacts. The comment does not provide any evidence for these claims and therefore a specific response is not possible.
- P25-4** Refer to RTC 02-2 and Master Response 4: Expansion of Use and Special Events, regarding the conditional use permit. The comment suggests that the MND does not analyze environmental impacts resulting from construction and operation of the project. All mitigation measures will required, and will be enforceable as project conditions. The lack of the prior conditional use permit in the project record does not in any way preclude the town from placing additional conditions on the project to avoid potentially significant environmental impacts.
- P25-5** Impacts related to transportation are addressed in Section 3.17, Transportation of the MND. An alternatives analysis is not required for either the preparation of an MND, or for the consideration of the proposed structure. As stated in the MND, the project would include a new circular shuttle drop-off area on Slalom Way that would improve the safety and circulation of vans and buses. Further, a review of site circulation determined that roadway travel lanes and emergency access pathways would remain unobstructed as long as roadway parking is cleared of snow and occurs outside of the designated 24-foot travel way.
- P25-6** Refer to Master Response 1: Groundwater, Master Response 2: Surface Runoff and Water Quality, and Master Response 5: General Plan Update. The comment is noted and forwarded to the decision-makers for their consideration.
- P25-7** Refer to Master Response 3: Sierra Nevada Yellow-legged Frog.
- P25-8** The MND acknowledges the pending lot line adjustment on page 12. The MND analysis considers impacts from the project including the lot line adjustment.
- P25-9** The comment is noted and forwarded to the decision-makers for their consideration. MM-HYD-1 in the MND commits the project applicant to a SWPPP and dewatering plan, and MM-AQ-1 through MM-AQ-3 mitigate project air quality impacts. Transportation impacts are analyzed in Section 3.17 of the MND and would not require mitigation.

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Comment Letter P26

Yumie Dahn

From: Michelle Gale [REDACTED]
Sent: Wednesday, June 21, 2023 6:30 AM
To: Yumie Dahn
Subject: Against Tahoe Donner Lodge Project

You don't often get email from [REDACTED]. [Learn why this is important](#)

Tahoe Donner has submitted plans for a 23,500 sq foot 3 story Downhill Ski Lodge to replace the current 2 story lodge which has 14,500 sq ft of usable space.

P26-1

I'm against building the new lodge for Truckee in Tahoe Donner for the following reasons:

1. Environmental and Wetlands Issues

P26-2

1. Building Issues - Over 400 truckloads of dirt will be excavated and removed, most of which is below the water table. The drainage and environmental impact to Alder Creek and the surrounding wetlands will be devastating.

2. Greenhouse Gas Issues - With 2-3 weddings per weekend, Tahoe Donner will bring over 600+ people for the wedding and to recreate in the area.

P26-3

2. Weekend Traffic Congestion, especially on Donner Pass Road and possibly Alder Creek Road. There are only two access points to the Tahoe Donner Ski Lodge.

P26-4

3. Noise and Light Pollution - Tahoe Donner has a terrible record with weddings regarding noise violations. At the time, the outdoor capacity for these weddings were 200 with 2-3 weddings a weekend. In addition, most wedding parties stayed in Tahoe Donner/Truckee utilizing STRs for events leading up to the wedding which created numerous weekend noise complaints in Truckee

P26-5

4. Lack of Housing Planning - With all the additional people needed to work this place, where will they live? Will Tahoe Donner take away employees from small local businesses? Most new developments are accompanied with a plan for affordable housing. Where is Tahoe Donner's plan?

P26-6

5. Continued promotion of Tourism - Truckee needs to diversify its economy vs continuing it's tourism expansion. The Lodge does nothing to help satisfy the needs of residents.

P26-7

As a full time Tahoe Donner resident I'm against this project.

Michelle Gale
[REDACTED]
Truckee, ca 96161
[REDACTED]

Response to Comment Letter P26

Michelle Gale
June 21, 2023

- P26-1** The commenter notes their opposition to the proposed project.
- P26-2** Refer to Master Response 1: Groundwater and Master Response 2: Surface Runoff and Water Quality.
- P26-3** The holding of special events is not included in the existing or proposed use category of the project site. Refer to Master Response 4: Expansion of Use and Special Events. Additionally, refer to Section 3.8, Greenhouse Gas Emissions for a discussion on greenhouse gas impacts.
- P26-4** Please see Section 3.17, Transportation of the MND for a discussion on transportation impacts.
- P26-5** The holding of special events is not included in the existing or proposed use category of the project site. Refer to Master Response 4: Expansion of Use and Special Events. Additionally, refer to Section 3.13, Noise of the MND for a discussion on noise impacts from the project.
- P26-6** As discussed in the MND, the replacement ski lodge is intended to provide improved facilities and services to serve existing demand. There would be no operational changes and therefore staffing levels are anticipated to remain the same.
- P26-7** The commenter's opinion is noted and forwarded to the decision makers for their consideration.