Town of Truckee
Planning Division

Pioneer East Development Permit/Tentative Map/Planned Development/Minor Use Permit

Modified Initial Study/15168 Checklist

May 2025

Prepared by

Lucas Kannall, Assistant Planner

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MODIFIED INITIAL STUDY/15168 CHECKLIST
MAY 2025

A. BACKGROUND

1. Project Title: Pioneer East Development Permit/Planned Development/Tentative Map/Minor Use Permit

2. Lead Agency Name and Address: Town of Truckee, Planning Division, 10183 Truckee Airport Road, Truckee, CA 96161

3. Contact Person and Phone Number: Lucas Kannall, Assistant Planner, (530) 582-2480

4. Project Location: 10400 Pioneer Trail, Truckee, CA 96161, Assessor's Parcel Number (APN) 019-410-028-000

5. Project Sponsor's Name and Address: Ciro Mancuso, Hidden Lake Properties, Inc, 11050 Pioneer Trail, Suite 100, Truckee, CA 96161

6. Existing General Plan Designation: Commercial

7. Existing Zoning Designation: Service Commercial (CS)

8. Required Approvals from Other Public Agencies: None

9. Surrounding Land Uses and Setting:

10. Project Description Summary:

The approximately 9.62-acre project site is located at 10400 Pioneer Trail just north of Interstate 80 in the Town of Truckee, California. The site includes site work from a previous approval that expired, including asphalt paving for vehicular circulation and parking, sidewalks, drainage facilities, dumpster enclosures, utilities, a low concrete wall and landscaping. The site work also retained large amounts of mature native trees on site, some of which will be removed to accommodate the proposed buildings. In addition, power poles and associated overhead utility lines generally run along the entire northern site boundary from west to east. Surrounding existing land uses include residential to the north within the Village Camp RV and Trailer Park, and manufacturing and industrial uses to the south and west. A California Highway Patrol station is located across Pioneer Trail to the southeast and interstate 80 is located across Pioneer Trail to the south. The Town of Truckee 2040 General Plan Update (GPU) designates the site as Commercial, and the site is zoned Service Commercial (CS).

The applicant is requesting land use approval to construct a service commercial/mixed use development on a 9.62-acre site located at 10400 Pioneer Trial (APN 019-410-028-000). The subject site is located at the intersection of Truckee Way and Pioneer Trail. The site is relatively flat with an elevation of approximately 5,950 feet. The requested land use approvals include the following:

- A Tentative Map to subdivide the existing parcel into 12 lots (11 privately developed lots and 1 common area lot). The proposed lots will range in size from 6,577 sf to 17,747 sf. The proposed common area lot will be 250,413 sf in size and be used for driveways, parking, open space, snow storage, storm water management and utility infrastructure.

- A Development Permit for construction of five commercial buildings and one residential building, totaling approximately 52,183 sf. The proposed residential building will total 14,676 sf and the five additional buildings to be constructed under this entitlement will total 37,507 sf. The project's total amount of commercial floor area will be 78,500 sf and residential floor area will be 14,676 sf upon construction of all 11 buildings, of which only six will be constructed as part of this project. The residential building will include a mix of 22, studio, 1- and 2- bedroom apartments to accommodate the project's workforce housing demand based on the Town's Workforce Housing Ordinance. Construction of utility, stormwater and parking infrastructure improvements have already been constructed under an expired entitlement and building permit.

    - The applicant is requesting that the six proposed buildings be allowed to be constructed in three phases, with Buildings 5 and another building of the developer's choice being constructed in Phase 1. Phase 1 will require the developer to begin construction and at minimum have foundations installed within two years of the entitlements being approved (By May 20, 2027) and construction shall be completed or an extension of time applied for within four years (May 20, 2029). Upon completion of Phase 1, Phase 2 may commence and shall also be exercised within two years and completed within four years, which would require the permit to be exercised by May 20, 2031 and construction completed by May 20, 2033 at the latest. Phase 2 shall include two additional buildings of the developer's choice. Phase 3 will also include two buildings of the developer's choice, while also meeting the previously mentioned time frames resulting in completion of construction of phase 3 by May 20, 2037 at the latest. Since this project includes a Tentative Map, the phasing shall be consistent with the Tentative Map process and be exercised before the expiration of the companion Tentative Map.

- A Minor Use Permit to allow three concrete trash enclosures, 620 feet of a 4-foot-tall concrete screening wall, four signs and four bollard parking lot lights to exist within an existing public utility easement used for transmission lines.

The applicant has also requested approval of a Planned Development, which is intended to promote and encourage maximum flexibility in site planning, property development, design and open space areas, while protecting the public health, safety, welfare, integrity and character of the Town and ensuring consistency with the General Plan. Approval of a Planned Development does allow greater flexibility within the Development Code, and therefore, does not require strict adherence to those standards. The applicant is requesting Development Code modifications to

(1) allow a ratio favoring more one-bedroom units and less two-bedroom units ,than is required by the Development Code, within the residential building, (2) to allow for sit-down dining on proposed lot 11 despite the use not being allowed within the Service Commercial (CS) zoning district, (3) allow construction of the building on lot 1 within the 300-foot scenic corridor setback from State Highway 80, and (4) remove the requirement to construct fully enclosed parking spaces for the market rate residential units. To meet the requirements of a Planned Development request, the applicant is proposing to deed restrict 25% of the residential units for affordable housing pursuant to Development Section 18.216.040D.1 or D.2 (Affordability of Workforce Housing Units).

As proposed, the project will initially consist of six buildings with floor areas ranging in size from 3,763 sf to 14,676 sf. Future development of the project will include five additional buildings (not a part of this submittal) within the subdivision. The requested land use approvals include a Tentative Map to subdivide the existing parcel into 12 lots (11 privately developed lots and 1 common area lot). The proposed lots will range in size from 6,577 sf to 17,747 sf. The proposed common area lot will be 250,413 sf in size and be used for driveways, parking, open space, snow storage, storm water management and utility infrastructure for all parcels within the subdivision. A Development Permit is requested for construction of five commercial buildings and one residential building, totaling approximately 52,183 sf. The project's total amount of commercial floor area is 78,500 sf and residential floor area is 14,676 sf once all buildings are constructed. The residential building will include a mix of 22, studio, 1- and 2- bedroom apartments to accommodate the project's workforce housing demand. The project is projected to include 3,925 sq ft of general manufacturing, 3,925 sq ft of wholesale distribution, 11,775 sq ft of warehouse space, 5,493 sq ft of indoor food service, 3,043 sq ft of specialty retail, and 50,339 sq ft of vacant commercial space anticipated to be used as office space. A Minor Use Permit to allow three concrete trash enclosures, 620 feet of 4-foot-tall concrete screening wall, four signs and four bollard parking lot lights to be installed within an existing public utility easement used for transmission lines. Utility, stormwater and parking infrastructure improvements have all previously been constructed for the site under an expired land use entitlement.

While only six buildings are proposed at this time, proposed square footages for the remaining lots are outlined as follows:

Lot Number	Allocated Floor Area	Proposed Floor Area
1*	8,504 sf	8,375 sf
2	6,593 sf	
3	6,576 sf	
4*	6,745 sf	6,599 sf
5* (residential)	14,676 sf	14,676 sf
6	5,813 sf	
7	4,161 sf	
8	12,890 sf	
9*	5,362 sf	3,787 sf
10*	10,374 sf	10,210 sf
11*	11,481 sf	8,536 sf

*Part of application number 2024-0000046

Community water, electricity, and natural gas currently exist on the site and common area site work has already been completed as part of a previous entitlement that is now expired.

B. INTRODUCTION

This Modified Initial Study/15168 Checklist identifies and analyzes the potential environmental impacts of the proposed project. The information and analysis presented in this document is organized in accordance with the order of the California Environmental Quality Act (CEQA) checklist in Appendix G of the CEQA Guidelines. The following provides a description of this Modified Initial Study's approach to evaluating the proposed project's consistency with California Environmental Quality Act (CEQA) Section 15168.

In May 2023, the Town of Truckee adopted the 2040 General Plan Update (GPU) and certified the Town of Truckee 2040 GPU and Downtown Truckee Plan (DTP) Project EIR (2040 GPU EIR). The 2040 GPU EIR is a program EIR, prepared pursuant to Section 15168 of the CEQA Guidelines (Title 14, California Code of Regulations [CCR], Sections 15000 et seq.). The 2040 GPU EIR analyzed full implementation of the GPU and identified GPU policies to mitigate the significant adverse impacts associated with the General Plan to the maximum extent feasible.

Pursuant to CEQA Guidelines Section 15168(c), projects can often be reviewed for consistency with the overlying programmatic EIR, in this case, the 2040 GPU EIR. The following identifies the standards set forth in Section 15168(c):

> (c) Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
>
> (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152.
>
> (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.
>
> (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.
>
> (4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.
>
> (5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

As discussed under CEQA Guidelines Section 15168(c)(2), as presented above, if the CEQA Lead Agency determines, pursuant to Section 15162 of the CEQA Guidelines, that an activity is within the scope of the project covered by the program EIR, new environmental documentation would not be required. In addition, as discussed under CEQA Guidelines Section 15168(c)(2), where later activities involve site specific operations, the agency should use a written checklist or

similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR. Such an analysis would be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR.

The Town of Truckee 2040 GPU designates the project site as Commercial (C), which is intended for uses such as office, retail, lodging and service commercial uses. This designation is generally applied at major interchanges. In addition, the project site is zoned Service Commercial (CS), which is applied to areas appropriate for more intensive commercial activities than are allowed in other commercial zoning districts and is consistent with the Commercial General Plan Designation. The proposed project would consist of a Tentative Map to subdivide the existing parcel into 12 lots (11 privately developed lots and 1 common area lot) with the construction of five commercial buildings and one residential building under a Development Permit and the remaining buildings to be entitled later. Therefore, the proposed project would be consistent with the site's 2040 GPU land use and zoning designations.

In accordance with Sections 15168(c)(2) and 15168(c)(4) of the CEQA Guidelines, this Modified Initial Study/15168 Checklist will provide a project-level analysis of the potential environmental effects associated with the proposed project to determine whether the project 1) is within the scope of activities evaluated in the 2040 GPU EIR; and 2) would trigger any of the criteria in CEQA Guidelines Section 15162.

For the purposes of this Modified Initial Study/15168 Checklist, the environmental evaluation of the proposed project will be based, generally, on the standards set forth in Section 15162. Modifications have been made to the checklist sections, generally consisting of additional questions that consider the potential for new or substantially increased significant impacts consistent with CEQA Guidelines Section 15162. The following identifies the standards set forth in Section 15162(a):

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    b) Significant effects previously examined will be substantially more severe than shown in the previous EIR [or negative declaration];
    c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant

effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The following checklist analysis documents the Town's consideration of potential new or more severe significant impacts associated with the proposed project, pursuant to CEQA. The determination in this document is that the project's impacts have been considered in a previous CEQA document (i.e., the 2040 GPU EIR) that was certified by the Town of Truckee, which remains relevant, and the conditions set forth in Section 15162 are not triggered by the proposed project. The discussion concludes that the conditions set forth in Section 15162 are not triggered by the modified project. In addition, the analysis herein has determined that the proposed project is within the scope of activities evaluated in the 2040 GPU EIR. As such, this Modified Initial Study is the appropriate environmental document for the proposed project, pursuant to CEQA Guidelines Section 15168.

C. PROJECT DESCRIPTION

The following provides a description of the project site's current location and setting, as well as the proposed project components.

Project Location and Setting

The approximately 9.62-acre project site is located at 10400 Pioneer Trail directly north of Interstate 80 and west of the Truckee Donner Recreation and Park District Recreation Center (see Figure 1 and Figure 2). The site includes site work from a previous approval that expired, including asphalt paving for vehicular circulation and parking, sidewalks, drainage facilities, dumpster enclosures, utilities, a low concrete wall and landscaping.

Conifer trees, and moderate brush are scattered throughout the site, although the majority of the site has been cleared of vegetation as part of the previous site work. In addition, power poles and associated overhead utility lines generally run along the entire northern site boundary from east to west.

Surrounding existing land uses include a mobile home and RV park to the north, improved commercial lots to the west, a California Highway Patrol building to the south and the Truckee Donner Recreation and Park District Recreation Center to the East. The Town of Truckee 2040 GPU designates the site as Commercial, and the site is zoned Service Commercial.

Proposed Development

The applicant is requesting land use approval to construct a service commercial/mixed use development. The site is relatively flat and contains site work from a previous entitlement that expired including asphalt paving for vehicular circulation and parking, sidewalks, draining facilities, dumpster enclosures, utilities, a low concrete wall and landscaping. The requested land use approval includes a Tentative Map to subdivide the existing parcel into 12 lots (11 privately developed lots and 1 common area lot). The proposed lots will range in size from 6,577 sf to 17,747 sf. The proposed common area lot will be 250,413 sf in size and be used for driveways, parking, open space, snow storage, storm water management and utility infrastructure. A Development Permit is requested for construction of five commercial buildings and one residential building, totaling approximately 52,183 sf. The proposed residential building will total 14,676 sf and the five additional buildings to be constructed under this entitlement will total 37,507 sf. The project's total amount of commercial floor area will be 78,500 sf and residential floor area will be 14,676 sf upon construction of all 11 buildings, of which only six will be constructed as part of this project.

The residential building will include a mix of 22, studio, 1- and 2- bedroom apartments to accommodate local workforce housing. The project is projected to include 3,925 sq ft of general manufacturing, 3,925 sq ft of wholesale distribution, 11,775 sq ft of warehouse space, 5,493 sq ft of indoor food service, 3,043 sq ft of specialty retail, and 50,339 sq ft of vacant commercial space anticipated to be used as office space. A Minor Use Permit to allow three concrete trash enclosures, 620 feet of 4-foot tall concrete screening wall, 4 signs and 4 bollard parking lot lights to exist within an existing public utility easement used for transmission lines. Construction of utility, stormwater and parking infrastructure improvements, which have previously been constructed.

The buildings are proposed to be constructed in three phases, with Buildings 5 and a building of the developer's choice constructed in Phase 1. The applicant will have two years to make progress on the buildings including construction of both buildings' foundations and four years to complete construction. Once Phase 1 is completed, Phase 2 will include two additional buildings of the developer's choice with two years to complete foundations and four years to complete construction. Phase 3 will include two additional buildings at the developer's discretions with similar time frames to Phases 1 and 2.

Figure 1
Regional Project Location

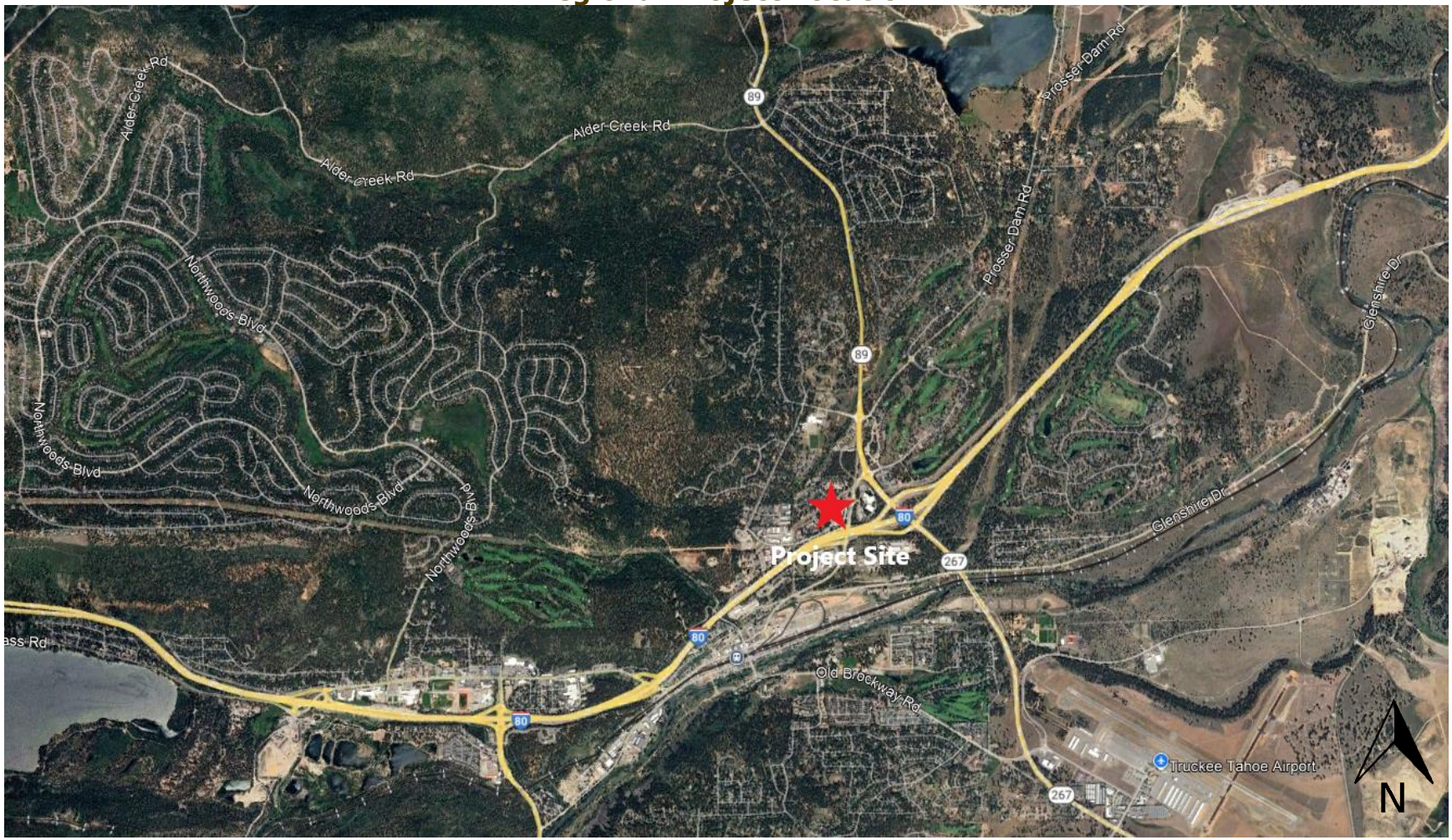
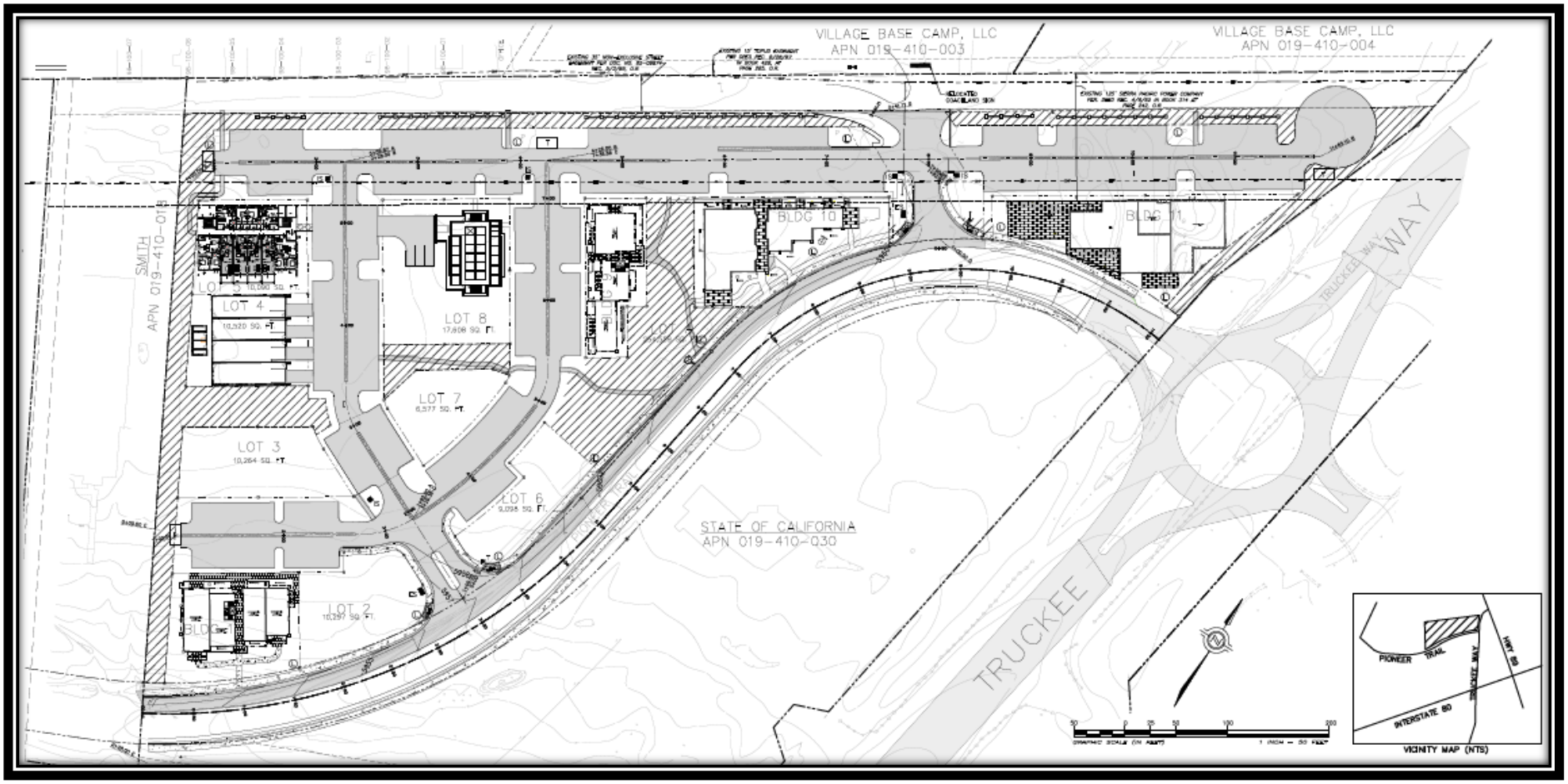


Figure 2
Project Site Boundaries Map

Figure 3
Site Plan



Note: Figure has been removed from the scope of this project.

Access and Circulation

The primary vehicle access points to the project site would be provided by an existing 24-foot-wide driveway on the north side and two 12-foot lanes divided by a landscape median on the south side, which would allow vehicles to both enter and exit the project site from Trails End. The access points connect to a road which allows for internal circulation and connects to all parking areas within the subdivision.

The surface parking lots would include a total of 292 parking stalls, based off of proposed uses within the development and the estimated square footage of each use, including commercial service, general manufacturing/ industrial/ processing, wholesale distribution and warehouse storage.

The previously completed site work included the construction of a sidewalk along the parcel frontage on Pioneer Trail. The new sidewalk would provide a pedestrian connection from Truckee Way and allow for access to pedestrian and bicycle facilities at Pioneer Commerce Center and the Trout Creek Trail. In addition to public pedestrian infrastructure, internal sidewalks will be constructed creating connectivity between the proposed buildings without having to walk in vehicle dedicated driveways.

Utilities

Power and water for the site will be provided by Truckee Donner Public Utility District (TDPUD), Southwest Gas and the Truckee Sanitary District (TSD). All utility infrastructure has been installed as part of the previously completed site work and all utilities are stubbed out at the future building sites.

Wastewater collection for the project will be provided by the Truckee Sanitary District who conveys the wastewater to the Tahoe-Truckee Sanitation Agency (TTSA) treatment plant. Water will be provided by the Truckee Donner Public Utility District through its groundwater supply and distribution system. Truckee Donner Public Utility District and Southwest Gas Company will provide power and gas to the subject site. Solid waste generated by the project will be transported to the Eastern Regional Landfill that acts as a transfer station before solid waste is transported to landfill in Lockwood, Nevada.

The Tahoe-Truckee Sanitation Agency treatment plant has sufficient capacity to treat wastewater generated by the project. With this sufficient treatment capacity, new or expanded treatment facilities will not be necessary for this project which will ensure that the treatment plant does not exceed Regional Water Quality Control Board (RWQCB) water quality standards. The Truckee Sanitary District, Sierra Pacific Power Company, Southwest Gas Company, and the Truckee Donner Public Utility District's response to the initial project routing have indicated adequate sewer, water, gas and power system capacity to serve the project.

Landscaping and Improvements

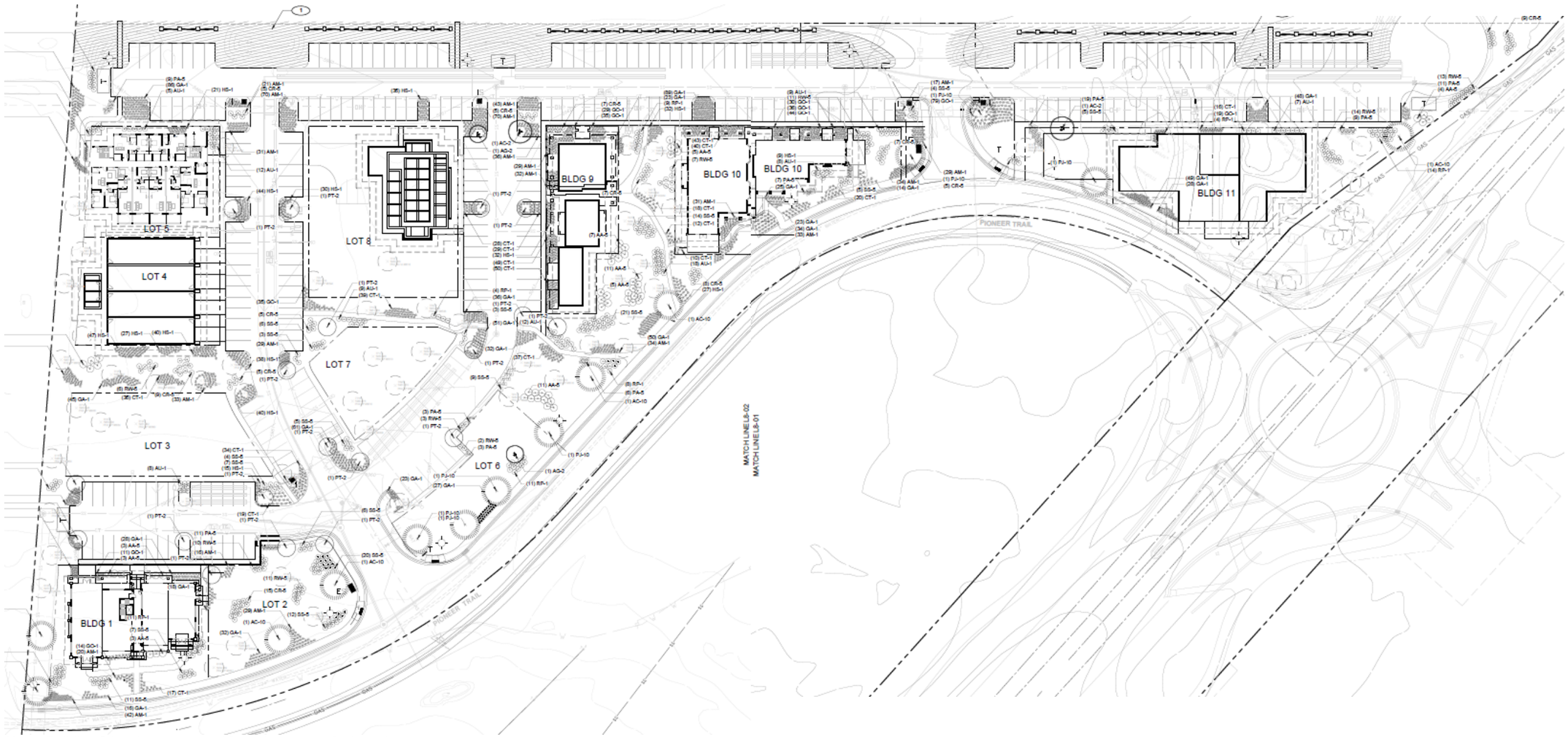
The project proposes landscaping with an alternative proposal as allowed by Development Code Section 18.40.040.4 (Alternatives to landscape requirements). This allows the review authority to modify the requirements of the landscaping section if they find that the project will achieve the same effect as the landscape requirements of the Development Code. The proposed landscaping for the development does not meet the requirements of the Development Code but is rather designed to be compliant with the California Fire Code, California Code of Regulations and the General Guidelines for Defensible Space as produced by the State Board of Forestry and Fire Protection while still adhering to the design elements required by the Development Code. The

current requirements for landscaping included in the Town's Development Code are not compliant with State standards.

The proposed landscaping includes many of the requirements of the Development Code, including interior landscaping within the parking areas, perimeter landscaping around the property, around each building and around each parking area. A four-foot-tall concrete wall has been constructed separating the parking lot at the rear of the property and the adjacent mobile home park as required by Development Code, Section 18.30.110 (Screening and Buffer). The main deviation from the Town's requirements will be the density of the proposed plantings, and not landscaping all disturbed areas. California Code of Regulations 1299 dictates minimum spacing between shrubs, trees and the placement of ground cover, that are not compatible with current Town regulations.

The proposal includes a water efficient landscaping worksheet, detailing the water use of the proposed plants, irrigation methods and irrigation efficiency to show that the proposal meets the minimum requirements for water conservation. The proposal falls well within the acceptable range of water use for the area to be landscaped, while also meeting required defensible space and nonflammable planting requirements from the State.

Figure 4
Landscape Plan



Note: Building 8 has been removed from the scope of this project.

Snow Storage

All development and proposed land uses that are planned with off-street parking and circulation areas shall be designed and constructed to provide snow storage areas in compliance with the minimum standards of the Development Code, Section 18.30.130. Snow storage has been strategically positioned throughout the sight to allow clearance of all parking areas, roadways and pedestrian areas.

Discretionary Actions

The proposed project requires approval of a Development Permit, Tentative Map, Minor Use Permit and a Planned Development from the Town of Truckee. Development Permits are required for all permitted commercial, industrial, and public uses that include 7,500 sf of floor area (5,000 sf in Downtown zoning districts) or disturb more than 26,000 sf of ground area, and for all permitted multi-family residential projects with 11 or more dwelling units. Because the proposed project would include development of an approximately 52,183 between the five commercial buildings and one residential building and the residential building will include 22 units, a Development Permit is required. A Tentative Map, and recordation of an eventual Final Map is required for the subdivision of the existing 9.62-acre parcel, into the proposed 12 lots. A Minor Use Permit will be required to allow three concrete trash enclosures, 620 feet of 4-foot tall concrete screening wall, four signs and four bollard parking lot lights to exist within an existing public utility easement used for transmission lines. A Planned Development is proposed to(1) allow a ratio favoring more one-bedroom units and less two-bedroom units ,than is required by the Development Code, within the residential building, (2) to allow for sit-down dining on proposed lot 11 despite the use not being allowed within the Service Commercial (CS) zoning district, (3) allow construction of the building on lot 1 within the 300-foot scenic corridor setback from State Highway 80, and (4) remove the requirement to construct fully enclosed parking spaces for the market rate residential units. To meet the requirements of a Planned Development request, the applicant is proposing to deed restrict 25% of the residential units for affordable housing pursuant to Development Section 18.216.040D.1 or D.2 (Affordability of Workforce Housing Units).

D. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

On the basis of the following Modified Initial Study, the Town has determined that the proposed project is within the scope of activities evaluated in the 2040 GPU EIR. All project impacts have been examined in the 2040 GPU EIR and none of the criteria set forth in CEQA Guidelines 15162 would be triggered by the proposed project. Therefore, none of the environmental factors below are affected.

☐ **Aesthetics**	☐ **Agriculture and Forest Resources**	☐ **Air Quality**
☐ **Biological Resources**	☐ **Cultural Resources**	☐ **Energy**
☐ **Geology and Soils**	☐ **Greenhouse Gas Emissions**	☐ **Hazards and Hazardous Materials**
☐ **Hydrology and Water Quality**	☐ **Land Use and Planning**	☐ **Mineral Resources**
☐ **Noise**	☐ **Population and Housing**	☐ **Public Services**
☐ **Recreation**	☐ **Transportation**	☐ **Tribal Cultural Resources**
☐ **Utilities and Service Systems**	☐ **Wildfire**	☐ **Mandatory Findings of Significance**

E. SOURCES

The following documents are referenced information sources used for the purpose of this Modified Initial Study:

1. Saxelby Acoustics. *Noise Technical Study for Pioneer East Development Permit in Truckee Project.* April 11, 2025.
2. CalEPA. *Cortese List Data Resources*. Available at: https://calepa.ca.gov/sitecleanup/corteselist/. Accessed September 2024.
3. California Building Standards Commission. *California Green Building Standards Code*. 2022.
4. California Department of Conservation. *California Important Farmland Finder*. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed August 2024.
5. California Department of Forestry and Fire Protection. *Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE – Truckee*. Available at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps/. Accessed September 2024.
6. California Department of Transportation. *California Scenic Highway Mapping System*. Available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa%20. Accessed August 2024.
7. CDFW. *BIOS*. Available at: https://apps.wildlife.ca.gov/bios6/. Accessed September 2024.
8. Department of Toxic Substances Control. *Hazardous Waste and Substances Site List (Cortese).* Available at: https://www.envirostor.dtsc.ca.gov/public/. Accessed September 2024.
9. Federal Emergency Management Agency. *Flood Insurance Rate Map 06057C0533E.* Effective February 3, 2010.
10. Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018.
11. RCHGroup Planning and Environmental Consulting, Air Quality and Greenhouse Gas Emissions Technical Report for Pioneer East Business Park, Truckee, CA.
12. Nevada Division of Environmental Protection. *Lockwood Fact Sheet.* Available at: https://ndep.nv.gov/uploads/land-waste-solid-fac-docs/lockwood-fact-sheet.pdf. Accessed September 2024.
13. Northern Sierra Air Quality Management District. *Guidelines for Assessing and Mitigating Air Quality Impacts of Land Use Projects*. August 18, 2009.
14. State Water Resources Control Board. *GeoTracker.* Available at: https://geotracker.waterboards.ca.gov/map/?myaddress=California&from=header&cqid=8858350455. Accessed September 2024.
15. Tahoe Truckee Transit. *Truckee TART Dial-A-Ride.* Available at: https://tahoetruckeetransit.com/truckee-tart-dar/. Accessed July 2023.
16. Town of Truckee. *Draft Environmental Impact Report for the Town of Truckee 2040 General Plan Update and Downtown Truckee Plan Project.* August 2022.
17. Town of Truckee. *Microtransit.* Available at: https://www.townoftruckee.com/government/engineering-and-public-works/public-transportation/microtransit. Accessed August 2023.
18. Town of Truckee. *Town of Truckee California Environmental Quality Act VMT Thresholds of Significance.* April 19, 2022.
19. Truckee Donner Public Utilities District. *Truckee Water System 2020 Urban Water Management Plan*. June 2021.
20. Truckee Tahoe Airport Land Use Commission. *Truckee Tahoe Airport Land Use Compatibility Plan* [Map 2A]. Adopted October 27, 2016.
21. LSC Transportation Consultants, Inc; Truckee Pioneer East Business Park Traffic Analysis. January, 2025.

F. DETERMINATION

On the basis of this Modified Initial Study/15168 Checklist:

☐ 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 applicant. 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" 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.

☒ In accordance with CEQA Guidelines Section 15168, 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 EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

May 13, 2025
Date

Jenna Gatto, Town Planner
Printed Name

Town of Truckee
For

G. ENVIRONMENTAL CHECKLIST

The purpose of the comparison is to evaluate whether the proposed project is within the scope of activities evaluated in the 2040 GPU EIR, which can be determined by assessing whether the proposed project would trigger any criteria in CEQA Guidelines Section 15162. As previously discussed, the environmental evaluation of the proposed project will be based, generally, on the standards set forth in Section 15162. Modifications have been made to the checklist sections, generally consisting of additional questions that consider the potential for new or substantially increased significant impacts consistent with CEQA Guidelines Section 15162. A "no" answer does not necessarily mean that potential impacts do not exist relative to the environmental category, but that a relevant change would not occur in the condition or status of the impact due to its insignificance or its treatment in a previous environmental document. The following impact evaluation categories will be used to evaluate the proposed project as compared to 2040 GPU EIR:

Do Proposed Changes Involve New or More Severe Impacts? Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this column indicates whether the changes represented by the current project will result in new significant impacts that have not already been considered and mitigated by a previous EIR or that substantially increase the severity of a previously identified significant impact. If a "yes" answer is given and more severe significant impacts are specified, additional mitigations will be specified in the discussion section including a statement of impact status after mitigation.

Any New Circumstances Involving New or More Severe Impacts? Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (environmental setting) that have occurred subsequent to the certification of an EIR, which would result in the current project having significant impacts that were not considered or mitigated by that EIR or which substantially increase the severity of a previously identified significant impact.

Any New Information Requiring New Analysis or Verification? Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects or the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, the question would be answered 'Yes' requiring the preparation of a subsequent EIR or supplement to the EIR. However, if the additional analysis completed as part of this Environmental Checklist Review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered 'No' and no additional EIR documentation (supplement to the EIR or subsequent EIR) would be required.

I. AESTHETICS. *Would the project:*		Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a.	Have a substantial adverse effect on a scenic vista?	No	No	No
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	No	No	No
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?	No	No	No
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No	No	No

Discussion

a. As discussed in the 2040 GPU EIR, scenic vistas throughout the Town include views of mountain ranges and open space areas. Scenic views of forested hillsides, meadows, and the river valley can be seen from the bluffs north of the Truckee River, along Interstate 80 (I-80), and Glenshire Drive looking south towards Martis Valley. The high vantage point afforded by the State Route 267 (SR 267) bridge also provides open space vistas across the Martis Valley and towards Northstar ski resort.

The GPU includes policies and implementation actions intended to preserve the natural resources in scenic areas within the Town. Policies related to preservation of resources include requirements that provide enough assurance to determine that the overall aesthetic of scenic resources, as viewed from key viewing locations, would be maintained. For example, GPU Policy CC-1.6 would help to preserve the scenic qualities of the Truckee River and other natural waterways through setback standards and development review. In addition, GPU actions would further ensure that impacts to scenic vistas are minimized because the Town would review and amend the Development Code regulations related to scenic resources (Action CC-1.A). With implementation of GPU policies and actions, the 2040 GPU EIR determined that projected development under the GPU would not have a substantial adverse effect on a scenic vista and buildout of the GPU would result in a less-than-significant impact.

Given that the proposed project is consistent with the project site's GPU land use designation, the buildout of the project site and associated impacts to scenic vistas have been anticipated by the Town and evaluated in the 2040 GPU EIR. In addition, the proposed project would be required to comply with applicable GPU policies and goals related to scenic vistas. The project site can be viewed from Interstate 80 and Building 1 is located approximately 220 feet from the Interstate 80 right of way, putting it within the 300-foot scenic corridor setback. However, public view of Building 1 from Interstate 80 would be extremely limited due to topography, vegetation and the California Highway Patrol Office Building obscuring the view. Furthermore, the building is being proposed at 32 feet in height as compared to the allowable height limit within the Service Commercial zoning district, which is 50 feet.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to scenic vistas than were previously analyzed in the 2040 GPU EIR. Therefore, the proposed project would be consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b. The 2040 GPU EIR determined that the GPU would facilitate development that could be visible from locally designated scenic corridors. GPU policies would protect scenic resources along locally designated scenic corridors. For example, Policy CC-1.3 would protect and enhance public views within and from the Town's designated scenic corridors through regulation of the visual appearance and location of development within identified buffer areas along scenic corridors (i.e., I-80 and SR 89 North). In addition, Policy CC-1.4 requires the Town to coordinate with Caltrans to improve the visual quality of freeway interchanges and designated scenic corridors in the Town, including improvements to roadside landscaping and lighting. With implementation of GPU policies, the 2040 GPU EIR concluded that projected development under the GPU would not be expected to substantially alter views of important scenic resources from visually sensitive areas, and impacts related to scenic resources within a State Scenic Highway would be less than significant.

According to the 2040 GPU EIR, State-designated scenic highways do not exist within the Town of Truckee. While the entire portion of I-80 that runs through the Town is eligible for designation as a State Scenic Highway, the portion of I-80 is not officially designated as a State Scenic Highway.

Thus, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to scenic resources than were previously analyzed in the 2040 GPU EIR, the proposed project would be consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

c. As described in the 2040 GPU EIR, the GPU would promote development within and near the Town's developed areas, which would minimize changes to Truckee's mountain-town character. In addition, GPU policies would encourage new development to be compatible with the scale and character of existing development and would preserve and enhance Truckee's visual character and quality. Furthermore, as noted in the GPU EIR, the GPU would minimize changes to the Town's predominantly mountain-town visual character by focusing future development within the Town's developed areas instead of in undeveloped open space areas of the town.

As noted above, the project site is obscured from most public right of ways, including Interstate 80 and is surrounded by already developed parcels. The proposed buildings within the site are compatible with proximate architectural styles, such as those found in the Pioneer Commerce Center to the west. The proposed buildings are of similar height with the commercial, industrial and manufacturing buildings on adjacent parcels and would not detract from any natural surroundings in the vicinity, of which there are little due to the zoning of the area.

Given that the proposed project would be consistent with the site's GPU land use designation, buildout of the project site and associated changes to the visual character and quality of the site have been anticipated by the Town and analyzed in the 2040 GPU EIR. In compliance with the CS zoning designation for the project site, the proposed buildings would not exceed 50 feet in height, with most buildings being proposed well

below that limit and the building exterior would feature earth tone colors. In addition, the proposed landscaping and retained natural vegetation would help blend in with the existing surroundings. Furthermore, the proposed project would comply with applicable GPU policies, such as CC-3.1, CC-3.41 and CC-3.7. Compliance with such policies would help ensure that the proposed project would not substantially degrade the character or quality of the site or its surroundings, including views of the site from the roadways.

The proposed project would also require approval of a Development Permit, because the proposed project would include development of a of over 7,500 square feet and 26,000 square feet of ground disturbance, as well as a Minor Use Permit, Tentative Map and Planned Development. The completed application would be reviewed by the Planning Commission and would ensure that proposed project adheres to all applicable Development Code requirements or that a Planned Development is approved.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to the degradation of visual character than what were previously analyzed in the 2040 GPU EIR. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

d. According to the 2040 GPU EIR, the GPU would facilitate development that would introduce new sources of light and glare, which would increase overall ambient nighttime light and daytime glare from building materials. As discussed in the 2040 GPU EIR, new light sources would include new residential developments, street lighting, parking lot lights, and security-related lighting for non-residential uses. These new light sources could result in adverse effects to adjacent land uses through the “spilling over” of light into these areas and “sky glow” conditions. In addition, buildout of the GPU would result in intensified nighttime lighting levels associated with increased traffic volumes and further residential and commercial development. Daytime glare could be produced by the increase in commercial, industrial, and residential structures, which could reflect sunlight. The GPU includes policies such as Policy CC-2.2, which requires the Town to implement outdoor lighting standards to minimize light pollution, glare, and light trespass into adjoining properties. GPU Policy CC-1.1 also prohibits development on hillsides, ridges, and bluff lines to limit negative visual impacts due to glare from glazing and lighting. Because the GPU includes policies to preserve views of the night sky and minimize light pollution and glare in Truckee, the 2040 GPU EIR concluded that light and glare impacts would be less than significant.

As discussed above, the project site is surrounded by improved parcels, including commercial, residential, manufacturing and industrial uses. Sources of existing light and glare are already present within the project vicinity and include exterior lighting from the surrounding existing developments, as well as headlights associated with vehicles travelling along Pioneer Trail, Truckee Way, Highway 89 and Interstate 80.

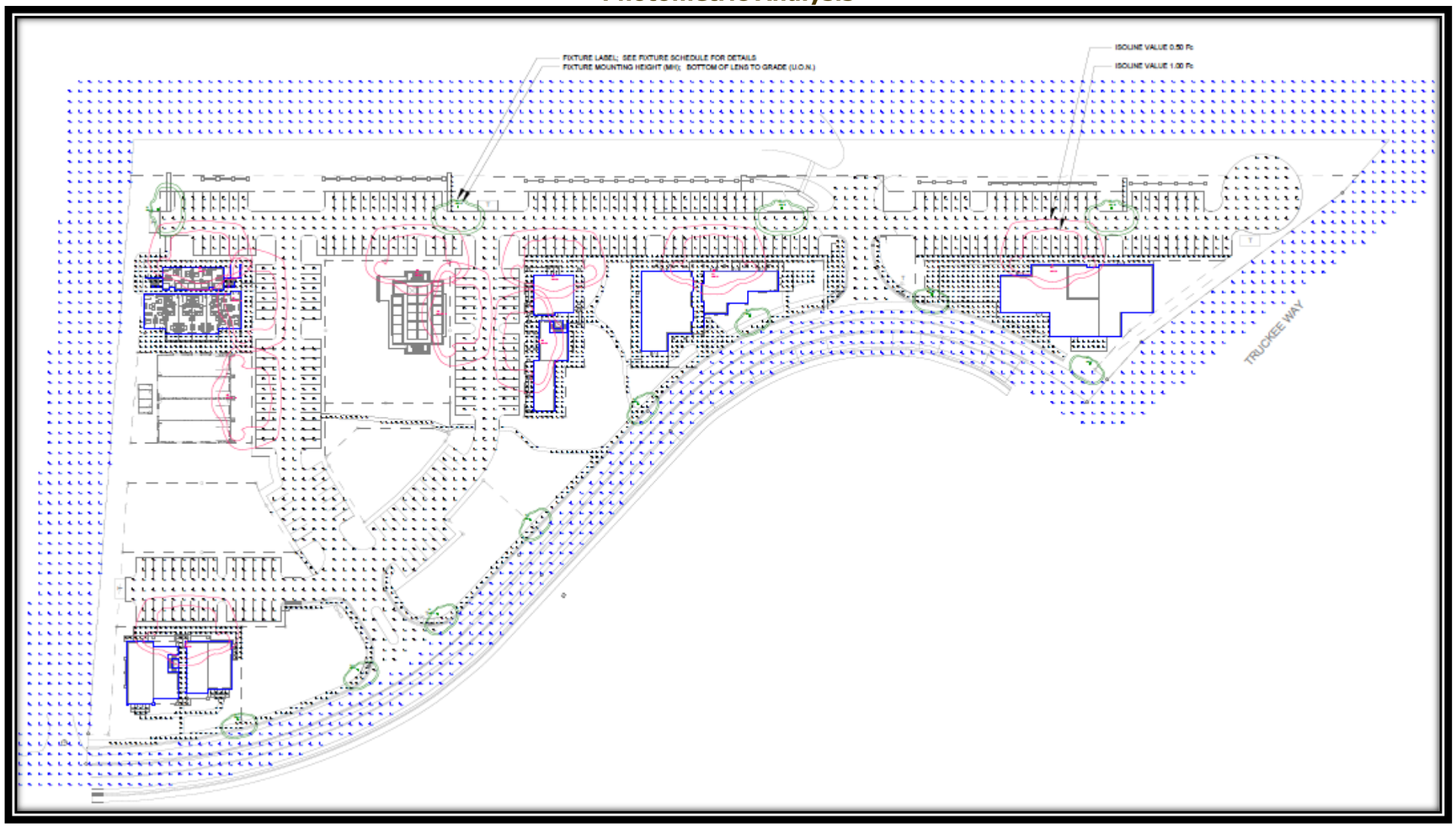
The project includes interior lighting for the buildings along with exterior security lighting, bollard lighting, parking lot lighting and downlighting for signage throughout the property. The application included a photometric analysis (Figure 5) showing how light will be contained within the site as well as specifications for proposed lighting showing that it will be downward facing and shielded.

Furthermore, the proposed project would be required to comply with the provisions of Truckee Municipal Code Section 18.30.060, which establishes lighting standards and

design criteria to minimize light pollution, glare, light trespass, and conserve energy while maintaining nighttime safety, utility, security, and productivity. The proposed project would also be required to comply with the California Building Standards Code (CBSC) standards for outdoor lighting, as prescribed by the Town's 2040 GPU EIR.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impact than what were previously analyzed in the 2040 GPU EIR Therefore, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

Figure 5
Photometric Analysis



II. AGRICULTURE AND FORESTRY RESOURCES. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Program of the California Resources Agency, to non-agricultural use?	No	No	No
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No	No	No
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))?	No	No	No
d. Result in the loss of forest land or conversion of forest land to non-forest use?	No	No	No
e. Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland to non-agricultural use?	No	No	No

Discussion

a,e. According to the 2040 GPU EIR, Farmland, as defined and mapped by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), does not exist in Truckee. Therefore, implementation of the Town's GPU would not convert farmland to non-agricultural uses and the conversion of farmland is not discussed in further detail within the 2040 GPU EIR.

According to the California Department of Conservation Farmland Mapping and Monitoring Program, the project site is located in an area which has not been mapped for agricultural resources. The project parcel is already improved within roadways, parking lots and utilities for the future project, while being a vacant parcel previously surrounded by improved parcels. In addition, power poles and associated overhead utility lines generally run along the entire northern site boundary from north to south. As such, the project site is not currently being used for agricultural purposes.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b. As discussed in the 2040 GPU EIR, the General Plan buildout area does not include and is not adjacent to farmland or land associated with a Williamson Act contract. Therefore, implementation of the GPU would not conflict with zoning for agricultural use or a Williamson Act contract.

As noted above, the project site is not currently being used for agricultural purposes. In addition, the project site is currently zoned Service Commercial, which does not allow for agricultural uses.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

c,d. The 2040 GPU EIR determined that implementation of the GPU would not convert any land designated as Open Space that includes forest land. Any tree removal associated with future development as part of the GPU would be required to comply with existing regulations and the GPU policies that are protective of forest land and the environment. Therefore, the 2040 GPU EIR determined that impacts to forest resources within the Town as a result of the GPU would be less than significant.

Land within Truckee and the Sphere of Influence includes a substantial amount of forested area. However, the Town has not zoned any part of the planning area as Forest Land or Timberland. Therefore, the 2040 GPU EIR concluded that implementation of the GPU would not conflict with the existing zoning in the town for forest land or timberland.

As noted above, the site has been substantially improved with utilities, stormwater infrastructure, roadways and parking areas. While conifer trees are scattered throughout the site, the project site does not include any lands considered 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)).

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

III. AIR QUALITY. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Conflict with or obstruct implementation of the applicable air quality plan?	No	No	No
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?	No	No	No
c. Expose sensitive receptors to substantial pollutant concentrations?	No	No	No
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No	No	No

Discussion

a,b. Truckee is located in the Mountain Counties Air Basin (MCAB), and is under the jurisdiction of the Northern Sierra Air Quality Management District (NSAQMD). In addition to the Truckee area, the NSAQMD has jurisdiction over an area encompassing Nevada, Plumas, and Sierra counties. Topography and meteorological conditions vary widely in the areas under the NSAQMD's jurisdiction and air quality conditions can be heavily influenced by local factors. Consequently, air quality conditions within the MCAB vary, resulting in differing attainment status designations for State and federal ambient air quality standards (AAQS) within various portions of the MCAB. The attainment status for ozone (O_3), fine particulate matter 2.5 microns in diameter ($PM_{2.5}$), respirable particulate matter 10 microns in diameter (PM_{10}), and carbon monoxide (CO) AAQS are presented in Table 1 below. Specifically, the NSAQMD is designated non-attainment for the federal and State eight-hour ozone, State one-hour ozone, State 24-hour PM_{10} standards, and federal 24-hour $PM_{2.5}$ ambient AAQS. Western Nevada County is in nonattainment for the federal and State ozone standards.

Ozone is a secondary pollutant generated from ozone precursor gases, primarily oxides of nitrogen (NO_X) and reactive organic gases (ROG), which react with sunlight to create ozone. Reductions in ozone are accomplished through reducing precursor emissions. Western Nevada County is designated as nonattainment for the federal 8-hour ozone standard and all of Nevada County is designated as being in nonattainment for the State 1-hour ozone standard. Ozone exceedances in Nevada County are primarily due to transport of emissions from the broader Sacramento area and San Francisco Bay Area. As a result, the NSAQMD has jurisdiction over a relatively small portion of the pollutants causing nonattainment within the MCAB. Nevertheless, because portions of the MCAB have been designated as nonattainment, NSAQMD is in the process of preparing a federally enforceable State Implementation Plan (SIP) for western Nevada County in accordance with the Clean Air Act. The only currently adopted attainment plan for the NSAQMD region is for the City of Portola. Given that the attainment plan only applies to the City of Portola and surrounding areas of Plumas County, the proposed project would not affect implementation of the attainment plan.

The SIP is an air quality attainment plan designed to reduce emissions of ozone precursors sufficient to attain the federal ozone standard by the earliest practicable date. The SIP under preparation would include various pollution control strategies. Overall emissions of ozone precursors must be reduced in western Nevada County (consistent

with Reasonable Further Progress requirements specified in the Clean Air Act) until attainment is reached.

Table 1
Attainment of AAQS within NSAQMD

Pollutant	State Designation	Federal Designation
O_3	Nevada County: Nonattainment (due to overwhelming transport) Sierra and Plumas County: Unclassified	**2008 Standard** • Western Nevada County: Serious Nonattainment • Sierra, Plumas, and Eastern Nevada County: Unclassifiable **2015 Standard** • Western Nevada County: Moderate Nonattainment • Sierra Plumas, Eastern Nevada County: Unclassifiable
PM_{10}	Nevada, Sierra, and Plumas Counties: Nonattainment	Unclassified
$PM_{2.5}$	Portola area in Plumas County: Nonattainment Nevada, Sierra, and remainder of Plumas County: Unclassified	**2012 Annual Standard** • Portola area in Plumas County: Nonattainment • Nevada, Sierra, and Remainder of Plumas County: Unclassifiable/Attainment **2012 24-hour Standard** • Unclassifiable/Attainment
CO	Plumas County: Attainment Nevada, Sierra County: Unclassified	Unclassifiable/Attainment

Source: NSAQMD. Guidelines for Assessing and Mitigating Air Quality Impacts of Land Use Projects. August 15, 2019.

Most of the reductions are expected to come from motor vehicles throughout the MCAB, Sacramento region, and San Francisco Bay Area becoming cleaner and from State regulations mandating further emissions reductions. Failure to submit and implement the SIP in a timely manner could result in federal sanctions, including the loss of federal highway funds, greater emission offset ratios for new sources, and other requirements that the U.S. Environmental Protection Agency (USEPA) may deem necessary.

The NSAQMD has established significance thresholds associated with development projects for emissions of the ozone precursors ROG and NO_X, as well as for PM_{10}. Adopted NSAQMD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated nonattainment. The significance levels, expressed in pounds per day (lbs/day), are listed in Table 2.

As shown in the table, NSAQMD has developed a tiered approach to determine significance levels based on a range of emissions levels. All projects, Level A or greater, are required to implement the following basic measures recommended by NSAQMD, as applicable:

- Alternatives to open burning of vegetative material will be used unless otherwise deemed infeasible by the NSAQMD. Among suitable alternatives are chipping, mulching, or conversion to biomass fuel;
- Grid power shall be used (as opposed to diesel generators) for job site power needs where feasible during construction; and
- If public transit is available in the project area, streets shall be designed to maximize pedestrian access to transit stops.

Table 2
NSAQMD Thresholds (lbs/day)

NO_X	ROG	PM_{10}
Level A		
<24 lbs/day	<24 lbs/day	<79 lbs/day
Level B		
24-136 lbs/day	24-136 lbs/day	79-136 lbs/day
Level C		
>136 lbs/day	>136 lbs/day	>136 lbs/day

Source: NSAQMD. Guidelines for Assessing and Mitigating Air Quality Impacts of Land Use Projects. August 15, 2019.

Projects that fall within the Level B emissions level thresholds require implementation of additional measures recommended by NSAQMD in order to result in a less-than-significant impact. Projects that exceed Level C emission level thresholds are required to implement further additional measures sufficient to reduce emissions to a level below significant. If, even after implementation of all such mitigation measures, a project would result in emissions in excess of the Level C thresholds, impacts would be considered significant and unavoidable.

The proposed project's construction and operational emissions were quantified using the California Emissions Estimator Model (CalEEMod) software version 2022.1 – a Statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including greenhouse gas (GHG) emissions, from land use projects. The model applies inherent default values for various land uses, including construction data, vehicle mix, trip length, average speed, compliance with the 2022 CBSC, etc. Where project-specific information is available, such information should be applied in the model. Accordingly, the proposed project's modeling assumes full buildout of the project will be achieved by 2027.

The proposed project's estimated emissions associated with construction and operations are presented and discussed in further detail below. A discussion of the proposed project's contribution to cumulative air quality conditions is provided below as well. All emissions modeling results are included in Appendix C to this Modified Initial Study.

Construction Emissions

The 2040 GPU EIR concluded that construction activity associated with buildout of the GPU would result in emissions of ROG, NO_X, and PM_{10}, which could exceed the daily emissions thresholds established by NSAQMD. GPU Policy COS-8.8 requires new development in the GPU to use NSAQMD's CEQA guidance and mitigate significant construction impacts. In addition, implementation of GPU Policy COS-8.10 would require construction contractors to use Tier 3 and Tier 4 engines, which reduce NO_X exhaust, as

well as basic construction measures that would reduce emissions of fugitive dust PM_{10}. However, the 2040 GPU EIR determined that the Town cannot guarantee that implementation of such measures would be sufficient to fully mitigate construction emissions for all projects in all scenarios. Thus, the 2040 GPU EIR concluded that the impact related to construction emissions of criteria pollutants would be significant and unavoidable.

According to the CalEEMod results, the proposed project would result in maximum unmitigated construction emissions as shown in Table 3. As shown in the table, the proposed project's construction emissions would be within the Level A thresholds for ROG, NO_X and PM_{10}.

Table 3
Maximum Unmitigated Construction Emissions (lbs/day)

Pollutant	Proposed Project Emissions	Threshold Level
ROG	12.8	Level A
NO_X	18.4	Level A
PM_{10}	3.5	Level A
Source: CalEEMod, April 2025 (see Appendix C).		

As stated and presented above, all projects, including the proposed project, are required to comply with the basic measures recommended by NSAQMD, as applicable, which would help to reduce the construction emissions from the levels presented in Table 3. In addition, all development projects under the jurisdiction of the NSAQMD are required to prepare a Dust Control Plan pursuant to Rule 226 (Dust Control). The proposed project's required implementation of the Dust Control Plan would help to further minimize construction-related emissions of fugitive dust, which is a component of PM_{10}, from the levels presented in Table 3. With implementation of the Dust Control Plan, the actual emissions of PM_{10} would be lower than the levels presented in Table 3.

As shown above, the maximum daily unmitigated ROG, Nox and PM_{10} emissions would meet the NSAQMD Level A thresholds of significance, thus NSAQMD Level A mitigation measures for use during design and construction phases would be required.

The Town of Truckee would require the following standard condition of approval for the proposed project, which would require implementation of the NSAQMD's measures for Level A construction emissions:

In compliance with NSAQMD guidelines for Level A construction emissions, the proposed project shall be required to implement all recommended NSAQMD measures, which are applicable to the proposed project. The following NSAQMD measures shall be included, via written notation, on project improvement plans, subject to review and approval by the Town of Truckee:

- Alternatives to open burning of vegetative material shall be used unless otherwise deemed infeasible by the NSAQMD. Among suitable alternatives are chipping, mulching, or conversion to biomass fuel;

- Grid power shall be used (as opposed to diesel generators) for job site power needs where feasible during construction;

Based on the above, incorporation of the aforementioned condition of approval would ensure compliance with NSAQMD-recommended measures. Overall, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to construction emissions and is within the scope of activities evaluated in the 2040 GPU EIR.

Operational Emissions

The 2040 GPU EIR determined that buildout of the GPU would result in long-term operational emissions that could violate or substantially contribute to a violation of federal and State standards for ozone and particulate matter. Emissions of NO_X associated with GPU buildout would be less when compared to baseline conditions due to regulatory mechanisms in place that will improve fuel economy into the future; however, emissions of ROG, CO, PM_{10}, and $PM_{2.5}$ would increase due to the introduction of new residential, commercial, and industrial development. According to the 2040 GPU EIR, as new development is constructed into the horizon of the project (2040), the Town will evaluate long-term operational emissions from such development on a project-by-project basis. Under such circumstances, emissions would be compared to NSAQMD's project-level mass emissions thresholds. While mitigation may be available to reduce emissions to less-than-significant levels, the 2040 GPU EIR concluded that the effectiveness of such mitigation could not be guaranteed. Therefore, the 2040 GPU EIR determined that impacts related to long-term operational emissions of criteria pollutants would be significant and unavoidable.

According to the CalEEMod results, the proposed project would result in maximum unmitigated operational criteria air pollutant emissions as shown in Table 4.

Table 4
Maximum Unmitigated Operational Emissions (lbs/day)

Pollutant	Proposed Project Emissions[1]	Threshold Level
ROG	8.9	Level A
NO_X	5.9	Level A
PM_{10}	5.2	Level A

Source: CalEEMod, April 2025 (see Appendix C).

As shown in the table, the proposed project's operational emissions would be within threshold Level A. According to the NSAQMD, emissions within the Level A threshold are considered to be less-than-significant, and additional mitigation beyond the basic measures recommended by NSAQMD (described above) is not required. Consequently, the proposed project would be considered to result in a less-than-significant impact related to operational emissions. Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to operational emissions and is within the scope of activities evaluated in the 2040 GPU EIR.

Cumulative Emissions

According to the 2040 GPU EIR, buildout of the GPU would contribute to cumulative air quality impacts associated with construction and operation of land uses in the MCAB. The 2040 GPU EIR determined that feasible mitigation does not exist for this impact beyond the policies and actions included in the GPU. As such, the GPU's contribution to cumulative emissions would be significant and impacts would be cumulatively

considerable. Therefore, the 2040 GPU EIR concluded that cumulative impacts associated with air quality emissions would be significant and unavoidable.

Due to the dispersive nature and regional sourcing of air pollutants, air pollution is already largely a cumulative impact. The nonattainment status of regional pollutants, including ozone and PM, is a result of past and present development, and, thus, cumulative impacts related to these pollutants could be considered cumulatively significant.

To improve air quality and attain the health-based standards, reductions in emissions are necessary within nonattainment areas. Adopted NSAQMD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated nonattainment, consistent with applicable air quality plans. As future attainment of AAQS is a function of successful implementation of NSAQMD's planning efforts, by exceeding the NSAQMD's Level C thresholds for construction or operational emissions, a project could contribute to the region's nonattainment status for ozone and PM emissions and could be considered to conflict with or obstruct implementation of the NSAQMD's air quality planning efforts.

As discussed above, the proposed project would address construction emissions by implementing NSAQMD-recommended measures during construction and operational emissions would be within the Level A threshold. According to the NSAQMD, emissions within the Level A threshold are considered to be less-than-significant, and additional mitigation beyond the basic measures recommended by NSAQMD is not required. Therefore, the proposed project would not be considered to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment, and the project's incremental contribution to cumulative emissions would be considered less than significant. Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to cumulative emissions and is within the scope of activities evaluated in the 2040 GPU EIR.

Conclusion

As discussed above, the proposed project would result in Level A construction emissions of criteria pollutants and the Town of Truckee would require the proposed project to implement NSAQMD's standard measures as a condition of approval. Incorporation of the aforementioned conditions of approval would ensure a less-than-significant impact related to construction emissions of criteria pollutants would occur associated with the proposed project. Furthermore, because operation of the proposed project would result in Level A emissions of all criteria pollutants, pursuant to NSAQMD guidelines, the proposed project could be considered to result in emissions that would not conflict with or obstruct implementation of the applicable regional air quality plans. Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to contributing to the region's nonattainment status for ozone or PM or contributing substantially to the violation of an air quality standard, or contributing to the significant cumulative impact of global climate change, and the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

c. Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, and/or duration of exposure to air

pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Sensitive receptors are typically defined as facilities where sensitive receptor population groups (i.e., children, the elderly, the acutely ill, and the chronically ill) are likely to be located. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and medical clinics. The nearest sensitive receptors to the project site include the existing mobile home park located directly north of the project site.

The major pollutant concentrations of concern are localized CO emissions, toxic air contaminant (TAC) emissions, and criteria pollutant emissions, which are addressed in further detail below.

Localized CO Emissions

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. High levels of localized CO concentrations are only expected where background levels are high, and traffic volumes and congestion levels are high. Emissions of CO are of potential concern, as the pollutant is a toxic gas that results from the incomplete combustion of carbon-containing fuels such as gasoline or wood.

The 2040 GPU EIR concluded that buildout of the GPU would not contribute to localized concentrations of mobile-source CO that would exceed an applicable ambient air quality standard, and, thus, the GPU would result in a less-than-significant impact regarding localized CO emissions.

Although NSAQMD does not have an established threshold for CO emissions, daily maximum CO emissions are presented herein in order to inform the public. Maximum unmitigated daily construction and operational emissions of CO are provided in Table 5 below.

Table 5
Maximum Unmitigated Emissions of CO (lbs/day)

Project Phase	CO Emissions
Construction	24.9
Operations	38.7
Source: CalEEMod, November 2024 (see Appendix C).	

Although NSAQMD does not have an established threshold for CO, the nearby air district, Placer County Air Pollution Control District (PCAPCD), who has authority over a portion of the MCAB, has a screening level for localized CO impacts. In the absence of NSAQMD thresholds, Truckee has elected to use the PCAPCD screening threshold for this environmental review.

According to the PCAPCD screening levels, a project could result in a significant impact if the project would result in CO emissions from vehicle operations in excess of 550 lbs/day, and if the project would increase vehicle trips such that the peak hour level of service (LOS) at an intersection would degrade from an acceptable LOS to an unacceptable LOS or if project-generated trips would result in an increase in delay by 10 seconds or more at an intersection that already operates at an unacceptable LOS. However, considering that the law has changed with respect to how transportation-related impacts may be addressed

under CEQA such that unacceptable LOS is no longer considered a significant impact on the environment under CEQA, this analysis relies on the 550 lbs/day of CO emissions screening criterion only.

As shown in Table 5, CO emissions associated with the proposed project would be well below the PCAPCD's 550 lbs/day screening level. Therefore, based on the nearby PCAPCD's screening levels for localized CO impacts, the proposed project would not be expected to result in substantial localized CO concentrations, and, thus, the proposed project would not be considered to expose sensitive receptors to substantial concentrations of localized CO.

TAC Emissions

Another category of environmental concern is Toxic Air Contaminants (TACs). The California Air Resources Board's (CARB's) *Air Quality and Land Use Handbook: A Community Health Perspective* (Handbook) provides recommended setback distances for sensitive land uses from major sources of TACs, including, but not limited to, freeways and high traffic roads, distribution centers, and rail yards. The CARB has identified diesel particulate matter (DPM) from diesel-fueled engines as a TAC; thus, high volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM. Health risks from TACs are a function of both the concentration of emissions and the duration of exposure. Health-related risks associated with DPM in particular are primarily associated with long-term exposure and associated risk of contracting cancer.

As discussed in the 2040 GPU EIR, buildout of the GPU would generate emissions of DPM from project construction; however, due to the relative short-term nature of construction and the highly dispersive properties of DPM, construction-generated DPM would likely not constitute a potentially significant impact. Nevertheless, the 2040 GPU determined that an inherent uncertainty exists regarding the scale, location, and types of construction that could occur under the GPU. Therefore, potential TAC generation could expose a sensitive receptor to substantial TAC concentrations and result in a significant impact. The GPU could also result in an increased exposure of existing or planned sensitive land uses to stationary or mobile-source TACs that would exceed applicable health-based standards. For projects that would locate sensitive receptors within 500 feet of I-80 and 1,000 feet of a railway, implementation of GPU Policy COS-8.7 would require future project applicants to conduct project-level health risk assessments (HRAs) to evaluate project-level emissions of TACs from construction and/or operational activity. However, the Town cannot assume that mitigation would be available and implemented such that all future health risk increases from exposure to TACs would be reduced to less-than-significant levels. Therefore, the 2040 GPU EIR determined that impacts related to exposure of sensitive receptors to TACs would remain significant and unavoidable.

The proposed project does not include any operational activities that would be considered a substantial source of TACs and does not propose sensitive land uses within 500 feet of I-80 since the residential building is further north than the 500 foot setback. As discussed above, high volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM. Due to the nature of the project, the proposed project would not be expected to attract heavy-duty vehicles, as the large majority of vehicle trips associated with the proposed project would be generated by passenger vehicles and light-duty trucks.

Accordingly, operations of the proposed project would not expose sensitive receptors to excess concentrations of TACs.

Short-term, construction-related activities could result in the generation of TACs, specifically DPM, from on-road haul trucks and off-road equipment exhaust emissions. However, construction is temporary and occurs over a relatively short duration in comparison to the operational lifetime of the proposed project. Health risks are typically associated with exposure to high concentrations of TACs over extended periods of time (e.g., 30 years or greater), whereas the construction period associated with the proposed project would be intermittent over approximately 10 years and all grading, drainage, utility infrastructure, road paving and revegetation work already completed. All construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation, which is intended to help reduce emissions associated with off-road diesel vehicles and equipment, including DPM. Because construction equipment on-site would not operate for long periods of time and would be used at varying locations within the site, associated emissions of DPM would not occur at the same location (or be evenly spread throughout the entire project site) for extended periods of time.

Due to the temporary nature of construction and the relatively short duration of potential exposure to associated emissions, the potential for any one sensitive receptor in the area to be exposed to concentrations of pollutants for a substantially extended period of time would be low. Thus, construction of the proposed project would not be expected to expose any nearby sensitive receptors to substantial pollutant concentrations.

Criteria Pollutants

As previously noted, the 2040 GPU EIR concluded that impacts related to construction and operation emissions of criteria pollutants would be significant and unavoidable.

The NSAQMD thresholds of significance were established with consideration given to the health-based air quality standards established by the Federal and State AAQS, and are designed to aid the NSAQMD in achieving attainment of such AAQS. Although the NSAQMD's thresholds of significance are intended to aid achievement of the AAQS for which the MCAB is in nonattainment, the thresholds of significance do not represent a level above which individual project-level emissions would directly result in public health impacts. Nevertheless, a project's compliance with the NSAQMD's thresholds of significance provides an indication that criteria pollutants released as a result of project implementation would not inhibit attainment of the health-based AAQS. Because project-related emissions would not exceed the NSAQMD thresholds for criteria pollutant emissions and, thus, would not inhibit attainment of the federal and State AAQS, the criteria pollutants emitted during project implementation would not be anticipated to result in measurable health impacts to sensitive receptors. Accordingly, the proposed project would not expose sensitive receptors to excess concentrations of criteria pollutants.

Conclusion

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to exposure to substantial pollutant concentrations than what were analyzed in the 2040 GPU EIR. Therefore, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

d. Emissions of principal concern include emissions leading to odors, emissions that have the potential to cause dust, or emissions considered to constitute air pollutants. Air pollutants have been discussed in sections “a” through “c” above. Therefore, the following discussion focuses on emissions of odors and dust.

According to the 2040 GPU EIR, the Town is uncertain about the size, land use type, specific building locations and site designs, and build-out periods of future development projects that would occur under the GPU. Therefore, the 2040 GPU EIR determined that emissions of odors and exposure to existing odors would be assessed on a project-by-project basis. Furthermore, the 2040 GPU EIR concluded that buildout of the GPU would result in the potential for increased exposure of sensitive receptors to odorous emissions as compared to baseline conditions, particularly if new odorous land use types are constructed and operated. The 2040 GPU incorporated all feasible odor reduction measures and additional plan-level measures are not available to further reduce impacts from short-term and long-term odors. According to the 2040 GPU EIR, the nature, feasibility, and effectiveness of project-specific mitigation cannot yet be determined and, therefore, the Town cannot assume that mitigation would be available and implemented such that all future odors would be reduced to less-than-significant levels. As a result, the 2040 GPU EIR determined that impacts related to odors would remain significant and unavoidable.

Emissions such as those leading to odor have the potential to adversely affect people. Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, quantitative analysis to determine the presence of a significant odor impact is difficult. Typical odor-generating land uses include, but are not limited to, wastewater treatment plants, landfills, and composting facilities. The proposed project would not introduce any such land uses. Furthermore, solid waste associated with the proposed project would be deposited in several masonry trash enclosures within dumpsters strategically placed throughout the development, which would reduce any solid waste-related odors.

Construction activities often include diesel-fueled equipment and heavy-duty trucks, which could create odors associated with diesel fumes that may be considered objectionable. However, construction is temporary and construction equipment would operate intermittently throughout the course of a day, and would likely only occur over portions of the site at a time. In addition, all construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation. Project construction would also be required to comply with all applicable NSAQMD rules and regulations, particularly associated with permitting of air pollutant sources. The aforementioned regulations would help to minimize air pollutant emissions, as well as any associated odors related to operation of construction equipment. Considering the short-term nature of construction activities, as well as the regulated and intermittent nature of the operation of construction equipment, the proposed project would not be expected to create objectionable odors affecting a substantial number of people.

Furthermore, the NSAQMD regulates objectionable odors through Rule 205 (Nuisance), which prohibits any person or source from emitting air contaminants or other material that result in any of the following: cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; endanger the comfort, repose, health, or safety of any such persons or the public; or have a natural tendency to cause injury or damage to business or property. Rule 205 is enforced based on complaints. If complaints

are received, the NSAQMD is required to investigate the complaint, as well as determine and ensure a solution for the source of the complaint, which could include operational modifications. Thus, although not anticipated, if odor complaints are made during construction or operation of the project, the NSAQMD would ensure that such odors are addressed, and any potential odor effects eliminated.

With respect to dust, as noted previously, the proposed project would be required to comply with all applicable NSAQMD rules and regulations. Specifically, implementation of a Dust Control Plan pursuant to District Rule 906, and Section 18.30.030 of the Town of Truckee Development Code, which provides dust suppression requirements, would be sufficient to reduce potential emissions of dust during construction. Following project construction, vehicles operating within the project site would be limited to paved areas of the site, and non-paved areas would be landscaped. Thus, project operations would not include sources of dust that could adversely affect a substantial number of people.

For the aforementioned reasons, construction and operation of the proposed project are not expected to result in emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to emissions (such as those leading to odors) adversely affecting a substantial number of people than what was analyzed in the 2040 GPU EIR. Based on the above, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

IV. BIOLOGICAL RESOURCES. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
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?	No	No	No
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	No	No	No
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?	No	No	No
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	No	No	No
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No	No	No
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	No	No	No

Discussion

a. Several species of plants and animals within the State of California have low populations, limited distributions, or both. Such species may be considered “rare” and are vulnerable to extirpation as the state’s human population grows and the habitats the species occupy are converted to agricultural and urban uses. State and federal laws have provided the California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) with a mechanism for conserving and protecting the diversity of plant and animal species native to the state. A sizable number of native plants and animals have been formally designated as threatened or endangered under state and federal endangered species legislation. Others have been designated as “candidates” for such listing. Still others have been designated as “species of special concern” by CDFW. The California Native Plant Society (CNPS) has developed its own set of lists of native plants considered rare, threatened, or endangered. Collectively, these plants and animals are referred to as “special-status species.” Although CDFW Species of Special Concern generally do not have special legal status, they are given special consideration under CEQA. Special-status species include the following:

- Plant and wildlife species that have been formally listed as threatened or endangered, or are candidates for such listing by the CDFW or National Marine Fisheries (NMFS);
- Plant and wildlife species that have been listed as threatened or endangered or are candidates for such listing by the CDFW;

- CDFW Species of Special Concern, which are species that face extirpation in California if current population and habitat trends continue;
- CDFW Fully Protected Species; and
- Species on CNPS Lists 1 and 2, which are considered to be rare, threatened, or endangered in California by the CNPS and CDFW.

In addition to regulations for special-status species, most birds in the U.S., including non-status species, are protected by the Migratory Bird Treaty Act (MBTA) of 1918. Under the MBTA, destroying active nests, eggs, and young is illegal. In addition, plant species on CNPS Lists 1 and 2 are considered special-status plant species and are protected under CEQA.

The 2040 GPU EIR analyzed the potential for buildout of the GPU to substantially impact candidate, sensitive, or special-status plant or wildlife species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. The 2040 GPU EIR determined that 46 special-status plant species and 34 special-status wildlife species (four fish, three amphibians, 12 birds, three invertebrates, and 12 mammals) are known to occur or have the potential to occur within the GPU area.

According to the 2040 GPU EIR, special-status species known to occur in the Town are commonly associated with sensitive habitats, such as riparian and wetland habitats. For example, projected development that occurs in the vicinity of rivers and creeks may be within habitat suitable for species such as Sierra Nevada yellow-legged frog and Lahontan cutthroat trout. In addition to the rivers and creeks that may be disturbed, projected development under the GPU could disturb upland habitats and the sensitive plant and animal species that may occupy them. Furthermore, the wide variety of habitats within Truckee, including those already largely developed, can support many species of nesting birds, including special-status species such as bald eagle and California spotted owl, as well as many common bird species that are protected by MBTA and California Fish and Game Code (CFGC).

The 2040 GPU determined that development under the GPU may result in the disturbance or loss of special-status plant and animal species. However, compliance with State and federal law, as well as implementation of the GPU's policies and actions, would reduce potential impacts of projected development under the GPU. As such, the 2040 GPU EIR concluded that development of the GPU would not 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 CDFW or USFWS, and potential impacts would be less than significant.

In addition to existing State and federal laws and permitting processes, the GPU includes several policies and actions intended to further reduce potential impacts on habitats and special-status species and require biological surveys and mitigation for significant effects. For example, Policies COS-1.3, COS-1.7, COS-3.1, COS-3.4, COS-3.2, COS-7.1, COS-3.3, COS-3.5, COS-3.6, COS-7.1, CC-2.1, CC-2.2, SN-2.5, SN-2.7, SN-8.1, SN-8.4 and Actions COS-3.A, COS-3.B, COS-3.D, and COS-3.E address open space conservation and encourage development to occur within the GPU planning area and other development areas. Other policies support invasive species eradication and native species protection, planting, and regeneration; require biological surveys to be conducted when sensitive species may be present; and support preservation of open space to limit habitat fragmentation.

In compliance with GPU policies, a Biological Survey will be required prior to site disturbance to ensure that no special status plants or animals are disturbed during construction. As noted above, the site is currently improved with utilities, stormwater infrastructure, roads and parking areas for the future project. In addition, power poles and associated overhead utility lines generally run along the entire northern site boundary from east to west. Remaining tree removal will be minimal and the site is mostly disturbed, but a Biological Survey will ensure no further impacts to sensitive species.

Migratory Bird Species Protected Under the MBTA

Due to the project site containing a large amount of mature conifer trees, concerns for impacts to migratory bird species is a concern upon their removal. The loss of an active nest of common or special-status bird species would be considered a violation of the CFGC, Sections 3503, 3503.5, 3513, and the federal MBTA. Shrubs and trees may provide nesting opportunities for common bird species that are adapted to ambient noise levels associated with the existing surrounding buildings, airport, and highway. In addition, raptor species may nest in mature Jeffrey pine trees within 300 feet of the proposed development area, including red-tailed hawk.

Construction activities including tree removal, other vegetation clearing, and noise and vibration have a potential to result in direct (i.e., death or physical harm) and indirect (i.e., nest abandonment) impacts to nesting birds. As such, pre-construction surveys shall be conducted for nesting birds and raptors to reduce impacts to a less-than-significant level. Consistent with GPU Policy COS-3.3, the Town of Truckee would require a standard condition of approval for the proposed project to ensure that impacts to nesting birds and raptors protected under the MBTA would not occur as a result of the proposed project.

General Plan Requirements

Pursuant to GPU Policy COS-3.3, Requirements for Biological Surveys, a biological site survey, conducted by a qualified biologist, is required for development on sites with the potential to contain critical or sensitive habitat or where special-status species may be present. Where special-status species are present, GPU Policy COS-3.3 requires mitigation in accordance with guidance from the appropriate state or federal agency charged with the protection of the subject species. The mitigation shall include implementation of impact minimization measures based on accepted standards and guidelines and best available science and prioritized as follows: avoid impacts, minimize impacts, and compensate for unavoidable impacts.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b,c. According to the 2040 GPU EIR, projected development under the GPU may result in the loss or degradation of riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. In addition, the 2040 GPU EIR concluded that projected development under the GPU may result in the loss or degradation of State or federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including marsh, streams, vernal pool), or by the Lahontan Regional Water Quality Control Board (RWQCB), through direct removal, filling, hydrological interruption, or other means. However, compliance with State and federal

law, as well as implementation of the GPU's policies and actions, would reduce potential impacts of projected development under the GPU policies and implementation programs to a less-than-significant level.

While the proposed project is not located in proximity to any waterways or riparian areas, the project is still required to ensure that any surface runoff is contained and filtered to reduce water pollution off site. As such, development of the proposed project would not impact the Truckee River or any other local waterways. Furthermore, the project site does not contain State or federally protected wetlands.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts to riparian habitats, sensitive natural communities, or wetlands than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

d. Wildlife movement corridors are routes that animals regularly use and follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, ridgelines, and rivers and creeks supporting riparian vegetation.

According to the 2040 GPU EIR, projected development under the GPU may interfere with the movement of resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors through habitat fragmentation, physical barriers to movement (e.g., fences, buildings, roadways), or anthropogenic noise. Additionally, development under the GPU may result in loss of wildlife nursery sites from direct removal or conversion of habitat or increased anthropogenic noise and human presence. The GPU includes policies that specifically require all new development to avoid identified native wildlife nursery sites and wildlife corridors within or adjacent to the development site by implementing no-disturbance buffers around such areas or implementing project-specific design features. The Town would amend the Development Code through Action COS-3.F to establish development standards (e.g., wildlife-friendly fencing and lighting) for new development adjacent to or in proximity to wildlife movement corridors (i.e., wildlife movement to nursery sites and between critical summer and winter range) or nursery sites (i.e., deer fawning areas) mapped by the CDFW to avoid or reduce indirect adverse effects of project development such that habitat functions and values are not lost. However, due to the wide variety of future project types with the GPU area, site conditions, and other circumstances associated with future development, complete avoidance of movement corridors or nursery sites may not be feasible. Therefore, the 2040 GPU EIR determined that impacts to species within wildlife movement corridors would be significant and unavoidable.

According to the CDFW Biogeographic Information and Observation System (BIOS), the project site is located south of the Loyalton Mule Deer Verdi-Truckee migration corridor. As discussed above, the project site is directly adjacent to areas that are already developed and subjected to regular disturbances. The project site does not support any native wildlife nursery sites and the proposed project would result in a less-than-significant impact to the movement of any native resident or migratory wildlife species.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously

analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

e. The Town of Truckee Tree Preservation Ordinance (Section 18.30.155 of the Town of Truckee Development Code) provides protection for trees, while exempting certain activities from the tree permitting process. The Tree Preservation Ordinance provides protection for trees greater than 24 inches in diameter at breast height (DBH), guidelines for preservation of trees, and mitigation for trees that are removed unnecessarily. The 2040 GPU EIR reasonably assumed that applicants for future projects would require discretionary entitlement and would abide by the restrictions therein, and implement mitigation based on existing local policies and ordinances. The GPU did not propose land use patterns or policies that would conflict with other local policies or ordinances protecting biological resources, including the tree preservation ordinance. Therefore, the 2040 GPU EIR concluded that impacts related to potential conflicts with local policies or ordinances protecting biological resources would be less than significant.

   Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would be consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

f. According to the 2040 GPU EIR, the Town of Truckee is not located within an area that is subject to an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan. Nor are any habitat conservation plans, natural community conservation plans, or similar plans being considered in the policy area. Therefore, impacts related to conflicting with such plans were not discussed further within the 2040 GPU EIR. Given that the project site is located within the Town's GPU planning area, the proposed project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP.

   Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

V. CULTURAL RESOURCES. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	No	No	No
b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	No	No	No
c. Disturb any human remains, including those interred outside of dedicated cemeteries.	No	No	No

Discussion

a-c. According to the 2040 GPU EIR, all areas within the Town are considered extremely sensitive regarding the presence of cultural resources and areas in adjoining or outlying subdivisions are considered moderately to highly likely to contain cultural resources. For example, the 2040 GPU EIR identifies areas along the Truckee River and its tributaries, and Donner Lake as highly sensitive for cultural resources.

The 2040 GPU EIR determined that projected development under the GPU could adversely affect historical resources. Although the GPU, Downtown Truckee Plan, and the Town's Development Code include policies to protect historical resources, avoidance of all historical resources may not be possible. Therefore, development under the GPU could result in damage to, or destruction of, a historic building or structure, thereby resulting in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5. According to the 2040 GPU EIR, feasible mitigation measures are not available to reduce impacts beyond compliance with the policies and actions in the proposed GPU and impacts to historical resources would remain significant and unavoidable. However, the 2040 GPU EIR concluded that for the vast majority of development projects implemented under the GPU, compliance with existing State and federal regulations, and compliance with proposed GPU policies and actions would minimize potential adverse effects on historical resources.

The 2040 GPU EIR also concluded that projected development under the GPU could adversely affect the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines. However, the GPU includes policies to protect resources by surveying, avoiding, monitoring, recording, or otherwise treating discovered resources appropriately, in accordance with pertinent laws and regulations. GPU Policy CC-4.1 is supported by the Town of Truckee Development Code 18.30.040(B), which outlines specific actions and timing of cultural resource surveys and 18.30.040(C), which allows for preconstruction excavation testing. In addition, GPU Policy CC-4.8 requires monitoring by a qualified professional whenever evidence of an archaeological site within a proposed project area exists, or the likelihood for occurrence of such sites is high. The 2040 GPU EIR concluded the implementation of applicable GPU Policies would reduce potential impacts to archaeological resources pursuant to Section 15064.5 to a less-than-significant level.

Furthermore, the 2040 GPU EIR determined that previously undiscovered human remains could be discovered when soils are disturbed during construction of projected development under the GPU. However, compliance with Health and Safety Code Sections

7050.5 and PRC Section 5097, which contain procedures for the treatment of Native American human remains, would reduce potential impacts to a less-than-significant level.

As previously discussed, the project site has been disturbed by previously installed infrastructure to serve the proposed development, such as paved areas for parking and circulation, as well as stormwater retention and utilities.

The proposed project would be required to comply with Section 18.30.040 of the Town of Truckee Development Code, which provides procedures and standards for the treatment of archaeological resources and human remains. Section 18.30.040 of the Town of Truckee Development Code is outlined below.

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.

1. The survey shall be conducted to determine the extent of the cultural resources on the site, before the completion of the environmental document for the project.
2. Where the results of the survey indicate the potential to adversely impact probable cultural resources, the report shall be transmitted to the appropriate clearinghouse for comment.
3. The Director shall maintain a confidential map file of known or probable cultural resource sites so as to assist in the identification of sensitive areas.
4. A qualified professional shall be present on-site during all excavation activity, including preliminary soil investigations, grading and trenching for foundations and utilities, in those cases where the identification of and potential impacts to cultural resources cannot be determined prior to project approval or when required by the Director based on a recommendation by the field surveyor.

C. Mitigation measures. Where development would significantly impact cultural or paleontological resources which have been identified, reasonable mitigation measures shall be required by the review authority as may be recommended by the field surveyor or by the State Historic Preservation Officer. Mitigation may include the following, as applicable/necessary:

1. The relocation or redesign of development to avoid the identified site;
2. The opening of the site to qualified, approved professional/educational parties for the purpose of exploration and excavation for a specified time before the commencement of development;
3. The utilization of special construction techniques to maintain the resources intact and reasonably accessible;
4. Where specific or long-term protection is necessary, identified sites shall be protected by the imposition of recorded open space easements; and
5. For significant sites of unique cultural resource value, where other mitigation techniques do not provide a necessary level of protection, the project shall not be approved until the Director determines that there are no reasonably available sources of funds to purchase the subject property or easement. The Director shall have 90 days from the date of discovery of a significant site to make this determination.

D. Cultural resources. Any cultural resources found on the project site shall be recorded or described in a professional report, subject to the approval of the Director; and

E. Human remains. If human remains are encountered during construction, the County Coroner shall be notified. If the remains are determined to be Native American, the Coroner has 24 hours to notify the Native American Heritage Commission of the findings.

Based on the above information, because the project would comply with GPU policies related to archaeological and historical resources, as well as the requirements of Section 18.30.040 of the Town of Truckee Development Code, the project is not anticipated to result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

VI. ENERGY. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No	No	No
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No	No	No

Discussion

a,b. The main forms of available energy supply are electricity, natural gas, and oil. A description of the 2022 California Green Building Standards Code and the Building Energy Efficiency Standards, with which the proposed project would be required to comply, as well as discussions regarding the project's potential effects related to energy demand during construction and operations are provided below.

California Green Building Standards Code

The 2022 California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11) is a portion of the CBSC, which became effective on January 1, 2023. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The CBSC standards regulate the method of use, properties, performance, types of materials used in construction, alteration repair, improvement and rehabilitation of a structure or improvement to property. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California. Requirements of the CALGreen Code include, but are not limited to, the following measures:

- Compliance with relevant regulations related to future installation of EV charging infrastructure in residential and non-residential structures;
- Indoor water use consumption is reduced through the establishment of maximum fixture water use rates;
- Outdoor landscaping must comply with the California Department of Water Resources' MWELO, or a local ordinance, whichever is more stringent, to reduce outdoor water use;
- Diversion of 65 percent of construction and demolition waste from landfills; and
- Incentives for installation of electric heat pumps, which use less energy than traditional heating, ventilation, and air conditioning (HVAC) systems and water heaters;
- Required solar PV system and battery storage standards for certain buildings; and
- Mandatory use of low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board.

Building Energy Efficiency Standards

The 2022 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy-efficiency measures from the 2019 Building Energy Efficiency Standards, went into effect starting January 1, 2023. The 2022 standards provide for additional efficiency improvements beyond the 2019 standards. The proposed project would be

subject to all relevant provisions of the most recent update of the CBSC, including the Building Energy Efficiency Standards. Adherence to the most recent CALGreen Code and Building Energy Efficiency Standards would ensure that the proposed museum facilities would consume energy efficiently.

Energy Use

Overall, the 2040 GPU EIR determined that buildout of the GPU would result in increased energy demand and consumption from increased construction activities, vehicle trips, and electrical and natural gas consumption. Such increases in energy consumption would be necessary to facilitate development within the Town of Truckee. Buildings developed under the GPU would comply with CALGreen Code (CCR Title 24) standards for building energy efficiency, and actions in the Climate Action Plan (CAP) Element of the GPU would include zero net energy requirements in 2030 and 2040 for residential and commercial development, respectively. Many policies in the CAP Element would apply to the buildout of the GPU, which would improve energy efficiency throughout the Town. Construction-related energy consumption would be temporary and not require additional capacity or increased peak or base period demands for electricity or other forms of energy. The 2040 GPU EIR concluded that energy consumption associated with development of the GPU would not result in wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Furthermore, as discussed in the 2040 GPU EIR, subsequent development in the Town would be beholden to relevant measures contained in the CAP Element that pertain to energy conservation and renewable energy use. These goals and policies would be applied to future development within the Town. For this reason, the project would not conflict with a local plan that encourages energy efficiency or the use of renewable energy. This impact would be less than significant.

A discussion of construction and operational energy use associated with development of the proposed project is discussed in further detail below.

Construction Energy Use

Construction of the proposed project would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the site where energy supply cannot be met via a hookup to the existing electricity grid; however, the NSAQMD requires grid power to be used as opposed to diesel generators, where feasible. Even during the most intense period of construction, due to the different types of construction activities (e.g., site preparation, grading, building construction), only portions of the project site would be disturbed at a time, with operation of construction equipment occurring at different locations on the project site, rather than a single location. Project construction would not involve the use of natural gas appliances or equipment.

All construction equipment and operation thereof would be regulated by the CARB's In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions

by retiring, replacing, or repowering older engines, or installing exhaust retrofits. In addition, as a means of reducing emissions, construction vehicles are required to become cleaner through the use of renewable energy resources. The In-Use Off-Road Diesel Vehicle Regulation would therefore help to improve fuel efficiency for equipment used in construction of the proposed project. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to further reduce demand on oil and limit emissions associated with construction.

Based on the above, the temporary increase in energy use occurring during construction of the proposed project would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. In addition, construction activities would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand.

Operational Energy Use

Following implementation of the proposed project, TDPUD would provide electricity to the project site, and natural gas would be provided by Southwest Gas. Energy use associated with operation of the proposed project would be typical of service commercial facilities requiring electricity and natural gas for interior and exterior building lighting, HVAC, electronic equipment, machinery, refrigeration, appliances, security systems, and more. Maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment. In addition to on-site energy use, the proposed project would result in transportation energy use associated with vehicle trips generated by the proposed project.

The proposed project would be subject to all relevant provisions of the CBSC, including the Building Energy Efficiency Standards and CALGreen Code. Adherence to the most recent CALGreen Code and the Building Energy Efficiency Standards would ensure that the proposed structure would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance attics and walls, and high efficacy lighting. Required compliance with the CBSC would ensure that the building energy use associated with the proposed project would not be wasteful, inefficient, or unnecessary. In addition, electricity supplied to the project site by TDPUD would comply with the State's Renewable Portfolio Standard (RPS), which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy sources to 60 percent of total procurement by 2030.

Although the project would increase electricity demand in the project area, given the relatively small increase as compared to energy usage in the region, the increased demand is not anticipated to conflict with the TDPUD's ability to meet the RPS requirements, or exceed the TDPUD's capacity such that the proposed project's energy demands would not be met.

With regard to transportation energy use, the proposed project would comply with all applicable regulations associated with vehicle efficiency and fuel economy. In addition, as discussed in Section XVII, Transportation, of this Modified Initial Study, the project site is not anticipated to substantially increase VMT. Furthermore, the Town and surrounding areas would provide customers with transit options, such as the Tahoe Area Regional Transit (TART), Truckee Dial-A-Ride a Route, microtransit, and other modes of public

transit. The site is in proximity to existing residential neighborhoods, transit infrastructure, and bicycle and pedestrian facilities, such as existing sidewalks along Pioneer Trail and the Trout Creek Trail. In addition, the proposed project would also include bicycle storage racks and EV chargers in the parking lot. As such, the proposed project would comply with GPU Policy CAP-4.3, which requires nonresidential developments to have EV-ready installation infrastructure or installed EV charging stations. The availability of such transit, bicycle, and pedestrian infrastructure in the project vicinity would help to reduce VMT and, consequently, fuel consumption associated with patrons and employees of the development traveling to the project site.

Conclusion

Based on the above information, the proposed project would involve energy use associated with construction activities and operations; however, the proposed project would comply with all applicable State energy standards, which would ensure that construction and operation of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

VII. GEOLOGY AND SOILS. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
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 based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No	No	No
ii. Strong seismic ground shaking?			
iii. Seismic-related ground failure, including liquefaction?			
iv. Landslides?			
b. Result in substantial soil erosion or the loss of topsoil?	No	No	No
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?	No	No	No
d. Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No	No	No
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No	No	No
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No	No	No

Discussion

a According to the 2040 GPU EIR, several earthquake faults are located in or near Truckee such as the Mohawk Valley Fault, which is located approximately 20 miles northeast of Truckee and the Dog Valley Fault, which is located southwest of Truckee near Donner Lake. In addition, the Polaris Fault runs north to south through the town adjacent to Martis Creek Dam. Although faults within the town limits, including the Dog Valley Fault, Polaris Fault, and various trace faults could rupture, none of the faults are delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist. As such, the 2040 GPU EIR concluded that the risk of fault rupture is low, and impacts would be less than significant.

Nevertheless, according to the 2040 GPU EIR, buildout of the GPU would result in the potential for development subject to future seismic events that could produce strong seismic ground shaking within the town that could damage structures or create adverse health and safety effects. However, development associated with buildout of the GPU would be consistent with the CBSC, Town of Truckee Development Code, and GPU policies, the 2040 GPU EIR determined that impacts associated with strong seismic shaking would be less than significant.

A geotechnical report was prepared for the project by Lumos and Associates in July 2005. Their investigation characterized the site geology and soil conditions, described the native soils and onsite fill, determined engineering properties as they related to the proposed construction and identified any adverse geologic, soil, or groundwater conditions.

According to the geotechnical report, the site is considered suitable for the proposed development, assuming the report's recommendations are incorporated into the project design. Fault mapping shows Late Quaternary faults within a 4 mile-radius and Early Quaternary faults within 10 miles of the site. The same mapping indicates a zone of isolated ground failures associated with the 1966 Truckee earthquake, approximately 5 miles northwest of the site. No active Holocene faulting is known to cross the project site. Due to the type and consistency of on-site soils and the absence of a relatively shallow water table, the potential for liquefaction of subsurface soils may be considered low. Seismic concerns for this site are not unlike other sites in the Truckee are. No evidence of active faulting was found on site.

The geotechnical report discusses the potential to expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving earthquakes, ground failures, and landslides. According to the report, these risks are minimal. Furthermore, the report makes a number of recommendations in terms of building design, and grading and paving techniques that will minimize potential impacts.

Project grading will be necessary for the driveways, parking areas, building footprints, and landscaped areas. All grading must comply with Federal, State, and Town regulation relating to grading and water quality, and there are no special or unique characteristics or circumstances of the project or site that would necessitate special measures. Therefore, project grading should not expose people or structures to risks from landslides, unstable soils, or subsidence.

Almost 9 acres of the site will be disturbed. The amount of grading that will occur will be extensive. Although the subject site is relatively flat, the project may result in substantial soil erosion based on the amount of grading, the proximity to adjacent land uses, and the topography of the site. Temporary and permanent erosion control measures will be required by the Town to stabilize disturbed soils, to mitigate the potential impact upon water quality during construction activity and to ensure the long-term protection of water quality and erosion control. The project will also be required to comply with the water quality and waste discharge requirements and standards of the Regional Water Quality Control Board (RWQCB) and the National Pollutant Discharge Elimination System (NPDES) permits. The RWQCB water quality standards are quantitative, qualitative, and performance requirements adopted for the purpose of reducing soil erosion and water quality impacts to a less than significant level. Additionally, the project must comply with the permanent erosion control measures including measures identified in the RWQCB's Truckee River Hydrologic Unit Project Guidelines for Erosion Control and the "State of California Stormwater Best Management Practices Handbook". These factors will reduce soil erosion impacts from wind and water to a less-than-significant level.

According to the geotechnical report, the proposed project will not be located on expansive soils. The report does state that the existing surface organic soils and loose or otherwise previously disturbed soils are not considered adequate to support any of the proposed improvements. The report outlines a strategy for preparing the existing soil so that the site can be developed. This project will be serviced by the Truckee Sanitary District; therefore there are no impacts related to the sites ability to support the use of septic tanks.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to landslides, liquefaction, subsidence/settlement, or lateral spreading than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b. According to the 2040 GPU EIR, implementation of the GPU would potentially result in development requiring vegetation removal and grading, which could increase potential for wind and water soil erosion, especially in areas with steep slopes. However, the 2040 GPU EIR concluded that compliance with applicable provisions of the Development Code and policies of the Conservation and Open Space and Safety and Noise Elements of the GPU, would reduce the potential for substantial erosion and impacts on soil erosion and loss or topsoil would be less than significant.

Issues related to erosion and degradation of water quality during construction are discussed in Section X, Hydrology and Water Quality, of this Modified Initial Study, under question 'a'. As noted therein, the proposed project would not result in substantial soil erosion or the loss of topsoil.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

d. Expansive soils can undergo significant volume changes with variations in moisture content. Specifically, such soils shrink and harden when dried and expand and soften when wetted. If structures are underlain by expansive soils, foundation systems must be capable of withstanding the potential damaging movements of the soil.

According to the 2040 GPU EIR, Truckee generally is located on coarser grained soils with a lower potential for expansion. The 2040 GPU EIR determined that with adherence to the CBSC, applicable provisions of the Development Code, and implementation of Safety and Noise Element policies in the GPU, impacts from the GPU relating to soil expansion to be less than significant. For example, development projects within the Town would be required to adhere to Sections 18.96.010 and 18.96.020 of the Development Code, which requires preparation of a preliminary soils report which includes recommendations for corrective actions to prevent structural damage to structures. As previously noted, GPU Policy SN-5.3 requires preparation of a soils report for new development in areas where geologic risks are known to exist, as required by the Town Building Code.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to expansive soils than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

e. According to the 2040 GPU EIR, the Development Code Section 18.12.080E, Commercial and Manufacturing Zoning District Performance Standards, prohibits the use of a septic system, portable toilets, or off-site restrooms for a permanent land use. Additionally, GPU Policy COS-7.5 states that the Town will enforce guidelines set forth by the Lahontan Region RWQCB regarding waste discharge associated with domestic wastewater facilities such as septic tank leach field systems. Impacts related to the capability of soil to adequately support the use of septic tanks or alternative wastewater disposal systems are not discussed in further detail within the 2040 GPU EIR.

The proposed project would connect to existing TSD sewer services. Thus, the construction or operation of septic tanks or other alternative wastewater disposal systems would not be included as part of the project.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

f. The project site does not contain any unique paleontological resources or unique geologic features, so these could not be impacted by development of the proposed buildings or related infrastructure.

The project site has been disturbed, and the GPU does not note the existence of any unique geologic features within the vicinity of the project site. Consequently, implementation of the proposed project would not be anticipated to have the potential to result in direct or indirect destruction of unique geologic features. Furthermore, compliance with GPU Policy CC-4.1 and Development Code Section 18.30.040 would be required if such paleontological resources are discovered at the project site.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

VIII. GREENHOUSE GAS EMISSIONS. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No	No	No
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	No	No	No

Discussion

a,b. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. An individual project's GHG emissions are at a micro-scale level relative to global emissions and effects to global climate change; however, an individual project could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. As such, impacts related to emissions of GHG are inherently considered cumulative impacts.

Implementation of the proposed project would cumulatively contribute to increases of GHG emissions. Estimated GHG emissions attributable to future development would be primarily associated with increases of carbon dioxide (CO_2) and, to a lesser extent, other GHG pollutants, such as methane (CH_4) and nitrous oxide (N_2O) associated with area sources, mobile sources or vehicles, utilities (electricity and natural gas), water usage, wastewater generation, and the generation of solid waste. The primary source of GHG emissions for the project would be mobile source emissions. The common unit of measurement for GHG is expressed in terms of annual metric tons of CO_2 equivalents ($MTCO_2e$/yr).

In September 2006, Assembly Bill (AB) 32, the California Climate Solutions Act of 2006, was enacted. Among other requirements, AB 32 required the CARB to identify the State-wide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020, and to develop and implement a Scoping Plan. On September 8, 2016, AB 197 and Senate Bill (SB) 32 were enacted with the goal of providing further control over GHG emissions in the State. SB 32 built on previous GHG reduction goals by requiring that the CARB ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by the year 2030. In addition, Executive Order (EO) B-55-18 (September 2018) establishes a statewide policy for California to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net-negative emissions thereafter. The goal is an addition to the existing statewide targets of reducing the State's GHG emissions. On September 16, 2022, AB 1279, also known as the California Climate Crisis Act, codified the carbon neutrality goal established by EO B-55-18.

According to the 2040 GPU EIR, buildout of the GPU would result in construction- and operation-related GHG emissions that could contribute to climate change on a cumulative basis. While all feasible reduction measures are included as policies and actions in the GPU, the proposed policies and programs included in the GPU would likely not result in sufficient GHG reductions for the Town to meet the State's longer-term goals of carbon

neutrality. As such, the 2040 GPU EIR concluded that impacts would be significant and unavoidable.

The proposed project's construction-related and operational GHG emissions are discussed in further detail below.

Construction GHG Emissions

Construction of the proposed project would take place over the course of approximately 10 years. Construction GHG emissions are a one-time release and are, therefore, not typically expected to generate a significant contribution to global climate change.

The project site is located within the jurisdictional boundaries of NSAQMD, which does not currently have any established thresholds for construction-related GHG emissions. However, NSAQMD prefers that construction-related GHG emissions are quantified for decision-makers and the public to consider. Thus, this Modified Initial Study takes the reasonable approach of applying thresholds of the nearby air pollution control districts of PCAPCD and Sacramento Metropolitan Air Quality Management District (SMAQMD). The PCAPCD and SMAQMD thresholds of significance are presented in Table 6.

Table 6
GHG Thresholds of Significance (MTCO2e/yr)

Air District	Construction Threshold
PCAPCD	10,000
SMAQMD	1,100

Sources: PCAPCD. CEQA Handbook Thresholds of Significance Justification Report. October 2016. SMAQMD. CEQA Guide, SMAQMD Thresholds of Significance Table. April 2020.

GHG emissions resulting from construction of the proposed project were modeled using CalEEMod under the same assumptions as discussed in Section III, Air Quality, of this Modified Initial Study. All modeling outputs are included in Appendix C to this Modified Initial Study.

The maximum unmitigated GHG emissions from construction of the proposed project, as compared against the applicable PCAPCD and SMAQMD construction-related GHG thresholds of significance, are presented in Table 7 below.

Table 7
Unmitigated Construction GHG Emissions ($MTCO_2e$/yr)

Construction Emissions	Maximum Annual GHG Emissions
Project Emissions	455
PCAPCD Threshold	10,000.00
SMAQMD Threshold	1,100.00
Exceeds Thresholds?	**NO**

Source: CalEEMod, November 2024 (see Appendix C).

As demonstrated in Table 7, the proposed project would result in construction GHG emissions of 455 $MTCO_2e$/yr. Therefore, the maximum annual GHG emissions associated with project construction would be below the comparable PCAPCD and SMAQMD thresholds of significance.

Operations

Similar to construction-related GHG emissions thresholds, NSAQMD does not currently have any established thresholds for operational GHG emissions. However, where local jurisdictions have adopted thresholds or guidance for analyzing GHG emissions, the local thresholds should be used for the project analysis. The Town of Truckee has adopted a CAP, which provides a jurisdiction-wide approach to the analysis of GHG emissions. The Town's CAP includes Townwide measures intended to reduce emissions from existing sources, as well as measures aimed at reducing emissions from future sources related to development within the Town. Thus, the analysis provided herein is focused on the proposed project's consistency with the Town's CAP.

Nonetheless, the estimated unmitigated maximum annual operational emissions from the proposed project were modeled for informational purposes. According to the CalEEMod calculations, the proposed project would generate maximum unmitigated GHG emissions of 1,574 $MTCO_2e$/yr during operations.

CAP Element Consistency

The CAP Element of the Truckee 2040 GPU serves as a Qualified GHG Reduction Strategy under Section 15183.5 of the CEQA Guidelines, simplifying development review for new projects that are consistent with the CAP. The CAP Element of the Truckee 2040 GPU includes the goals, policies, and actions that have been developed to reduce the Town's GHG emissions, consistent with the Town's and the State's emissions reduction targets and goals. Some of the goals in the CAP Element are supported by goals and policies from other elements of the Truckee GPU (e.g., the Mobility Element). The GPU policies and actions are copied into the CAP Element from their respective source elements to show how CAP goals are met and to ensure consistency throughout the GPU. The proposed project's consistency with applicable GPU policies included in the CAP Element is presented in Table 8 below.

Table 8
Town of Truckee CAP Consistency Analysis

Policies and Actions	Project Consistency
Policy M-1.3: Vehicle Miles Traveled Standards. Implement the adopted vehicle miles traveled (VMT) standards and thresholds and evaluate new development projects using the adopted VMT analysis methodologies, thresholds of significance, and mitigation strategies.	Please refer to question 'b' in Section XVII, Transportation, of this Modified Initial Study for discussion of VMT. The following is a summary of the VMT analysis contained therein: As the non-residential uses are not screened, a full VMT analysis of the non-residential uses was conducted. First, the VMT generated by each land use is calculated. Then the thresholds of significance are determined and compared to the project-generated VMT. The project is located in TAZ 79, which has an average trip length of 13.2 miles. Multiplying this trip length by the project's daily vehicle trips generated for each land use provides the 'proposed project VMT' by use. Each proposed land use correlates to an anticipated VMT per square foot of proposed use. While certain land uses exceed allowed

	VMT thresholds of significance, when the project is evaluated cumulatively, as a mixed use project, trip generation rate can be developed to show that the total non-residential uses' VMT are less than the cumulative threshold of significance VMT. Therefore, the non-residential land uses are considered to have a less than significant impact on VMT. As discussed in Section XVII, Transportation, of this Modified Initial Study, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. Thus, the proposed project would be consistent with Policy M-1.3.
Policy M-2.5: Bicycle and Roadway Improvements. Use roadway, roundabout, and intersection improvements as an opportunity to improve bicycle and pedestrian facilities and connections, where feasible.	The proposed project would not include roadway, roundabout, and/or intersection improvements. However, as part of the proposed project, the entirety of the site's Trails End frontage has been improved with a new six-foot-wide sidewalk. The new sidewalk will provide a pedestrian connection from Truckee Way to the project site and provide connectivity to the Trout Creek Trail. A new four-foot-wide sidewalk would also be constructed to allow pedestrian access throughout the site without having to walk within dedicated vehicular circulation areas. As such, the proposed project would be consistent with Policy M-2.5.
Policy M-2.13: Bike Parking Requirements for New Development. Require new and intensifying nonresidential and multi-family residential projects to have adequate bike parking and storage. Consider whether bike parking or bike-share facilities can be applied toward parking reductions.	The proposed project would include 43 short-term bicycle parking spaces, as well as each residential unit will have its own fully enclosed storage space for long-term bicycle parking. The proposed project would not conflict with Policy M-2.13.
Policy M-3.1: Transit Access. Require new development to incorporate features that accommodate and maximize transit access and use, including shelters, safe routes to transit stops, and Americans with Disabilities Act (ADA) improvements, and ensure that right-of-way for future transit access is reserved in plans for new growth areas.	Transit services in the Truckee area are provided through the Tahoe Truckee Area Regional Transit (TART). The nearest transit stop to the project site is a Truckee Local Route (TLR) stop located approximately 130 feet east of the project site, at the entrance to the Truckee Donner Recreation and Park District's Recreation Center. Other nearby transit stops include one at the entrance to Rue Ivy off of Truckee Way and another on the North Side of State Route 89 North at the entrance to Gray's Crossing. As such, the proposed project would not conflict with Policy M-3.1.

Policy CAP-4.3: EV-Ready Installation Infrastructure. Require new residential and nonresidential developments to have EV–ready installation infrastructure or installed EV charging stations.	The 2022 CBC requires new developments to include the necessary electrical infrastructure for EV charging stations. As previously discussed, the proposed project would include EV chargers in the parking lot. Therefore, the proposed project would comply with Policy CAP-4.3.

As shown in Table 8, the proposed project would comply with all applicable GPU policies included in the CAP Element.

It should also be noted that, while several actions included in the CAP are related to implementation of future Townwide policies and programs that have not yet been developed within the Town, and, are therefore not currently applicable to the proposed project, the proposed project would include several design features that would generally be consistent with the goals of such actions. For example, the Town of Truckee has not yet updated the Development Code to require EV and electric bicycle charging stations in new commercial and multi-family development, as required by GPU Policy CAP-4.3. However, the proposed project would include the installation EV chargers in the parking lot. Thus, the proposed project would generally be consistent with GPU Policy CAP-4.3.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No	No	No
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	No	No	No
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No	No	No
d. Be located on a site which 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?	No	No	No
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?	No	No	No
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No	No	No
g. Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires?	No	No	No

Discussion

a. The 2040 GPU EIR concluded that potential development under the GPU could potentially result in the exposure to hazardous substances due to more hazardous materials being transported, used, or disposed of within Truckee. Hazardous material and waste transport, use, and disposal are governed by the regulations of the Occupational Safety and Health Administration (OSHA), Department of Transportation, California Division of Occupational Safety and Health (Cal/OSHA), Department of Toxic Substances Control (DTSC), State Water Resources Control Board (SWRCB), California Highway Patrol (CHP), California Department of Transportation (Caltrans) and Nevada County Office of Emergency Services. The existing federal, State, and local regulations and oversight in place would effectively reduce the inherent hazard associated with the transport, use, and disposal of hazardous materials and wastes. In addition, GPU Policy SN-7.1 requires the Town to coordinate with the Nevada County Environmental Health Department in the review of all projects that require the use, storage, or transport of hazardous materials and waste to ensure that necessary measures are taken to protect public health and safety. GPU Policy SN-7.4 also encourages the effective implementation of workplace safety regulations and ensures that hazardous material information is available to users and employees. Furthermore, GPU Policy SN-7.2 requires the Town to cooperate with Tahoe Truckee Sierra Disposal to facilitate opportunities for safe disposal of household hazardous waste and public education programs. Therefore, the 2040 GPU EIR determined that a less-than-significant impact would occur as a result of the GPU buildout.

Projects that involve the routine transport, use, or disposal of hazardous materials are typically industrial in nature. As such, the proposed service commercial development would not involve the routine transport, use, disposal, or generation of substantial amounts of hazardous materials. On-site maintenance may involve the use of common cleaning products, fertilizers, and herbicides, any of which could contain potentially hazardous chemicals; however, such products would be expected to be used in accordance with label instructions. Due to the regulations governing use of such products and the amount anticipated to be used on the site, routine use of such products would not represent a substantial risk to public health or the environment. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b. According to the 2040 GPU EIR, implementation of the GPU is not anticipated to result in development with unique characteristics that would result in a significant hazards as a result of reasonably foreseeable upset or accident conditions. As previously noted, GPU Policies SN-7.1, SN-7.2, and SN-7.4 would require the Town to coordinate with local agencies, such as the Nevada County Environmental Health Department and the Tahoe Truckee Sierra Disposal, to ensure that the public and the environment would be protected from any potential impacts related to the use, storage, transportation, or disposal of hazardous materials. All hazardous waste associated with buildout of the GPU would be stored and handled in compliance with applicable federal and state laws and regulations, resulting in a less-than-significant impact.

As noted above, the site has been substantially improved with utilities, stormwater infrastructure, roadways and parking areas. According to the California DTSC Envirostor Database, active hazardous material sites do not exist at the project site or in the project vicinity and the closest sites being located on the southern side of Interstate 80.

Construction activities associated with the proposed project would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. Small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used at the project site and transported to and from the site during construction. However, the project contractor would be required to comply with all California Health and Safety Codes and local Town ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. During project operation, hazardous materials use would be limited to landscaping products such as fertilizer and pesticides/herbicides. Such chemicals would be utilized in limited quantities according to label instructions.

Because the proposed project would involve limited use of hazardous materials, primarily limited to the construction phase of the project, during which the contractor would be required to adhere to all relevant guidelines and ordinances regulating the handling, storage, and transportation of hazardous materials, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset

and accident conditions involving the likely release of hazardous materials into the environment.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

c. The 2040 GPU EIR determined that while development under the GPU could occur within one-quarter mile of a school and could expose schools to hazardous materials or wastes, such substances are regulated by federal, State, and local laws that would ensure hazardous materials are controlled and that exposures are minimized. As previously noted, GPU Policies SN-7.1, SN-7.2, and SN-7.4 would require the Town to coordinate with local agencies, such as the Nevada County Environmental Health Department and the Tahoe Truckee Sierra Disposal, to ensure that the public and the environment would be protected from any potential impacts related to the use, storage, transportation, or disposal of hazardous materials. As such, buildout of the GPU would result in a less-than-significant impact related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The nearest school relative to the project site is Alder Creek Middle School, which is located approximately 1,181 feet (0.22-mile) northwest of the site. As such, the project site is within one-quarter mile of an existing school. However, as discussed under questions ‘a’ and ‘b’ above, development of the proposed project would not result in any significant hazards related to the use, transport, disposal, or upset of hazardous materials. Additionally, the project contractor would be required to comply with all California Health and Safety Codes and local County and Town ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Therefore, the proposed project is not anticipated to result in impacts related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

d. According to the 2040 GPU EIR, Truckee contains several identified hazardous materials handling and waste sites. Under the GPU, development could occur on or near these sites, or in other areas where hazardous wastes exist that have not been previously identified. However, existing federal, State, and local laws and regulations pertaining to removal and disposal of contaminated soil would protect new development activities from exposure to hazardous waste, and a less-than-significant impact would result.

The California Environmental Protection Agency (Cal EPA) has compiled a list of data resources that provide information regarding the facilities or sites identified as meeting the "Cortese List" requirements, pursuant to Government Code 65962.5. The components of the Cortese List include the DTSC Hazardous Waste and Substances Site List, the list of leaking underground storage tank (UST) sites from the SWRCB's GeoTracker database, the list of solid waste disposal sites identified by the SWRCB, and the list of active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the SWRCB.

The project site is not included on the DTSC Hazardous Waste and Substances Site List, SWRCB's list of solid waste disposal sites, list of leaking UST sites, or list of active CDO and CAO. Therefore, the proposed project would not create a significant hazard to the public or the environment related to being located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

e. As noted in the 2040 GPU EIR, the Truckee Tahoe Airport borders the GPU area to the southeast, which could lead to airport noise and safety hazard exposure for people and workers within the town. However, the GPU contains specific goals and policies related to land use and airport safety planning to minimize any conflict. For example, GPU Policy SN-7.6 requires the Town to monitor aviation-related incidents that impact the Town and consult with the Truckee Fire Protection District and the Truckee Tahoe Airport on potential safety and emergency response impacts resulting from increased airport operations. In addition, GPU Policies SN-7.7 and SN-8.16 require development applicants to work with the Truckee Tahoe Airport District and the Truckee Tahoe Airport Land Use Commission to ensure compliance with the Truckee Tahoe Airport Land Use Compatibility Plan (LUCP). As such, the 2040 GPU EIR determined that development of the GPU, would result in a less-than-significant impact with respect to airport noise and safety hazards.

The Truckee Tahoe Airport is located approximately 1.47 miles (7,759 feet) southeast of the project site. As a result, the project site is located within the Truckee Tahoe Airport Influence Area. A discussion of noise-related impacts associated with the project site being located within the Truckee Tahoe Airport Influence Area is provided in Section XIII, Noise, of this Modified Initial Study. Therefore, the following discussion is focused on whether the proposed project would result in a safety hazard associated with the Truckee Tahoe Airport for people working in the project area.

According to the Truckee Tahoe Airport LUCP, the project site is located within Compatibility Zone D, which is designated "Primary Traffic Pattern Zone." As outlined in the Truckee Tahoe Airport LUCP, new buildings within Compatibility Zone D may not exceed 100 feet and discourages schools, hospitals and nursing homes. As shown in

Table D-1 of the Truckee Tahoe Airport LUCP, the proposed project is considered a conditionally compatible use within Zone C. Table D-1 of the Truckee Tahoe Airport LUCP provides criteria for conditionally compatible uses within each Safety Zone to ensure the uses are compatible with the Truckee Tahoe Airport. The intent of land use safety compatibility criteria is to minimize the risks associated with an off-airport aircraft accident or emergency landing, and the criteria focus on reducing the potential consequences of such events should they occur. For example, uses which create visual or electronic hazards to flight are unacceptable within any of the LUCP Compatibility Zones (Zones A through E). In addition, uses with the potential to cause an increase in the attraction of birds or other wildlife are unacceptable within Compatibility Zone A and conditionally acceptable within Compatibility Zones B1 through E. In compliance with the LUCP requirements for Zone D, the proposed project would not cause visual or electronic hazards to flight and would not increase the attraction of birds or other wildlife. Furthermore, in compliance with the CS zoning designation for the project site, the proposed buildings would not exceed 35 feet in height despite the Service Commercial zoning district allowing buildings up to 50 feet in height; therefore, the proposed building would be consistent with the 100-foot building height criteria of Zone D. Furthermore, the proposed project would be consistent with the standards for the Town's GPU land use designation of Commercial and the zoning designation of Service Commercial, and development of the project site was anticipated and evaluated in the 2040 GPU EIR.

As discussed in the 2040 GPU EIR, the Federal Aviation Administration (FAA) requires notice of proposed construction for projects located within 20,000 feet of a public use airport, and other projects that may pose a potential hazard for people residing or working in the project area, due to height, visual hazard, or the attraction of wildlife. Because the project site would be located approximately 7,759 feet from the Truckee Tahoe Airport, the project would be subject to FAA evaluation, and the FAA would be notified of the proposed development pursuant to Section 77.11 of the FAA regulations.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

f. The Town of Truckee Emergency Operations Plan addresses the Town's responsibilities in emergencies associated with natural disaster, human-caused emergencies and technological incidents. The Emergency Operations Plan provides a framework for coordination of response and recovery efforts within the Town in coordination with local, State, and federal agencies. As discussed in the 2040 GPU EIR, construction associated with implementation of the GPU would not likely hinder emergency response activities or physically interfere with established evacuation routes. Although construction activities associated with development of the GPU could temporarily impair roadways used for emergency response and evacuation, standard construction procedures for development of a construction management plan would address these conditions and would develop alternative routes.

According to the 2040 GPU EIR, buildout of the GPU would increase the intensity of development in some areas of the town and accommodate more growth. Such growth could generate conflicts with existing adopted emergency response and evacuation plans by increasing traffic volumes and decreasing the ratio of emergency response resources to residents. However, the GPU contains specific goals and policies related to emergency response and evacuation planning to minimize any conflict with such existing plans, and

expressly calls for updating the plans to be compatible with growth. As such, the 2040 GPU EIR determined that development of the GPU would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and a less-than-significant impact would occur.

During construction of the proposed project, all construction equipment would be staged on-site so as to prevent obstruction of local and regional travel routes in the town that could be used as evacuation routes during emergency events. With respect to project operations, the proposed project would not alter the existing circulation system in the surrounding area. As a result, the proposed project would not have a significant impact with respect to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

g. Issues related to wildfire hazards are further discussed in Section XX, Wildfire, of this Modified Initial Study.

As discussed in 2040 GPU EIR, implementation of the GPU would allow for growth in an area at risk for wildfires, which would increase the risk of exposing project occupants and structures to a significant risk of loss, injury, or death involving wildland fires. While implementation of existing federal, State, and local regulations and GPU policies and actions would reduce impacts associated with exacerbated wildfire risks, the 2040 GPU EIR concluded that impacts associated with buildout of the GPU would remain significant and unavoidable.

Virtually all of the Truckee area is considered to be in a Very High Fire Hazard Severity Zone (VHFHSZ), as defined by the California Department of Forestry (CAL FIRE). According to recently updated Fire Hazard Severity Zone mapping, this parcel is now determined to be within the VHFHSZ. The proposed project would be required to comply with all applicable requirements of the California Fire Code and the Chapter 7A of the CBC through the installation of automatic fire alarm systems, fire hydrants, and other applicable requirements. The proposed project would also be situated near existing roads and other utilities, that would help reduce risks related to wildfire. The project site is also surrounded by existing development, which would further reduce risks related to wildfire, due to the existing development generally acting as a fuel break because of a lack of natural debris such as brush and green waste within developed sites.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

X. HYDROLOGY AND WATER QUALITY. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	No	No	No
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No	No	No
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:	No	No	No
i. Result in substantial erosion or siltation on- or off-site;			
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			
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			
iv. Impede or redirect flood flows?			
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No	No	No
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No	No	No

Discussion

a. As discussed in the 2040 GPU EIR, development that may occur under the GPU could generate new sources of surface water and groundwater pollution, from both point and non-point sources, in the Truckee region, including Lake Tahoe. Point sources of pollutants would include industrial and commercial facilities, snow storage areas, and construction sites, while non-point sources would include new impervious or disturbed surfaces capable of generating an increase in stormwater runoff. Compliance with the existing Development Code, implementation of policies in the GPU, and compliance with the Construction General and Industrial General Permits would minimize adverse effects to water quality as a result of the GPU buildout.

The 2040 GPU EIR also notes that although a hydrologic connection between the Truckee area and Lake Tahoe does not exist due to Lake Tahoe's upstream location, development of the GPU could have an indirect physical effect on lake clarity and water quality as a result of vehicle miles traveled (VMT) in the Tahoe Basin generated by growth under the Town's GPU. However, a very limited correlation exists between VMT and roadway sediment loads. Roadway management practices (e.g., controls on use of winter roadway sand, installation of sediment capturing Best Management Practices [BMPs]) have been shown to be the most effective means of limiting roadway-generated sediment from entering Lake Tahoe. The 2040 GPU EIR concluded that VMT in the Tahoe Basin anticipated to result from implementation of the GPU would not result in a substantial degradation of Lake Tahoe water quality or clarity due to implementation of roadway

sediment management practices. As such, the 2040 GPU EIR concluded that implementation of the GPU would result in a less-than-significant impact on surface and groundwater quality.

During the early stages of construction activities that would occur on the project site, topsoil would be exposed due to grading and excavation associated with the proposed buildings although surface paving for parking and circulation as well as utilities and stormwater infrastructure have already been installed. After grading and prior to overlaying the ground surface with impervious surfaces, the potential exists for wind and water erosion to discharge sediment and/or urban pollutants into stormwater runoff, which could adversely affect water quality.

The State Water Resources Control Board (SWRCB) regulates stormwater discharges associated with construction activities where clearing, grading, or excavation results in a land disturbance of one or more acres. The proposed project would disturb more than one acre, and, thus, would be subject to applicable SWRCB regulations. Furthermore, the Town is required to operate under the Waste Discharge Requirements for Small Municipal Separate Storm Sewer Systems (MS4), which also serves as a National Pollutant Discharge Elimination System (NPDES) Permit. The NPDES permit mandates that the Town is required to implement the necessary legal authority and implement appropriate procedures, to regulate the entry of pollutants and non-stormwater discharges into the Town stormwater conveyance system. Therefore, the proposed project is required to comply with the Town of Truckee NPDES Permit requirements.

Development Code, Section 18.30.050, Drainage and Storm Water Runoff, requires the preparation and submittal of drainage and erosion control plans for projects requiring approval of Zoning Clearance, a Development Permit, Minor Use Permit, or Use Permit. The proposed project would require approval of a Development Permit and Minor Use Permit, and, therefore, preparation and submittal of a drainage and erosion control plan would be required. Furthermore, Section 18.30.050 requires a Storm Water Pollution Prevention Plan (SWPPP) to be prepared for all development projects. A SWPPP describes Best Management Practices (BMPs) to control or minimize pollutants from entering stormwater and must address both grading/erosion impacts and non-point source pollution impacts of the development project, including post-construction impacts. Truckee requires all development projects to use BMPs to treat runoff, which would include implementation of both temporary and permanent BMPs, in accordance with the Town of Truckee Erosion Prevention Standards, to ensure that the water quality of drainages within the town is not adversely impacted. Temporary construction phase BMPs are anticipated to include silt fencing, straw wattles, staging areas, tree protection fencing, dust control, and other miscellaneous provisions as required by the regulatory agencies. BMPs would ensure that water quality is not degraded during the construction of the proposed project. In addition to the stormwater treatment BMPs, other permanent BMPs include soil stabilization, revegetation, and landscaping of all non-hardscaped disturbed areas of the project site.

Approximately 25% of the site will remain as pervious surface, which will facilitate groundwater recharge. The project will not directly withdraw waters from the groundwater supply. Construction grading will not be located near any springs or high groundwater and will be of insufficient depth to interfere with groundwater.

Drainage improvements within the project must comply with drainage/stormwater runoff regulations of the Development Code, including temporary and permanent erosion control

measures and retention/treatment facilities. Based on these factors and the gentle slope of the majority of the site, the project will not result in substantial erosion or siltation either on-site or off-site. During storm events in excess of the design storm, water is to be discharged via proposed overflow drains. The RWQCB requires that excess drainage be conveyed to a stable drainage way and 1) not cause erosion or other adverse impacts on downstream water quality due to physical effects, 2) not cause property damage or threaten public safety, and 3) not cause a nuisance attributable to the discharge of waste. According to RWQCB staff comments, the proposed design appears to meet their criteria.

The proposed project would also be required to comply with all applicable GPU policies related to minimizing potential soil erosion. For example, GPU Policy COS-7.2 requires implementation of the Lahontan RWQCB's BMPs, and GPU Policies COS-7.5, COS-7.5, and COS-7.6 require new development to study conditions and design projects to reduce potential effects on surface water and groundwater quality. In addition, grading and potential for erosion that could affect water quality are addressed through GPU Policies COS-5.1, COS-5.2, and COS-5.3, and GPU Actions COS-5.A and COS-5.B.

Finally, the proposed project would not include land uses typically associated with the generation or discharge of polluted water. Additionally, a drainage and erosion control plan, and SWPPP would be required by Development Code Section 18.30.050 for the proposed project. As such, the proposed project would not violate water quality standards and degrade water quality.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b,e. Water supplies for the town are provided by the TDPUD. According to the TDPUD's 2020 Urban Water Management Plan (UWMP), all of the TDPUD's water supply is obtained through the pumping of groundwater from the Martis Valley Groundwater Basin (MVGB). The UWMP anticipates that the maximum demand at buildout of the GPU is approximately 4,344 million gallons per year (mgy). With a total water supply of at least 22,000 mgy, adequate water supply exists to meet the projected buildout. For the purposes of the UWMP analysis, buildout of the TDPUD service area is assumed to include continued operations of all existing land uses, as well as development of all currently vacant parcels. The UWMP states that because of the large amount of water in storage in relation to the projected buildout demand, TDPUD would have adequate supply to meet normal year, single dry year, and multiple dry years demand. As such, the 2040 GPU EIR concluded that while buildout of the GPU would increase demand for water, the increase in demand has been anticipated in the UWMP.

In addition, buildout of the GPU would not substantially deplete groundwater supplies because the MVGB has adequate water to accommodate projected growth in the service area through the year 2035 even if recharge of the basin did not occur. The GPU would allow for an increase in developed impervious areas but at the most conservative estimate, impervious areas would represent approximately 0.008 percent of the policy area. Because groundwater supplies would not be depleted, groundwater withdrawal would not affect surface waters or wetlands. Furthermore, existing regulations, GPU policies, and land ownership would limit development of impervious surfaces in areas of potential

recharge. As such, the 2040 GPU EIR concluded that impacts would be less than significant.

Furthermore, the Truckee area is regulated by the Lahontan RWQCB which implements its Basin Plan to protect water quality. The local Sustainable Groundwater Management Act (SGMA) agencies implement the Martis Valley Groundwater Management Plan (GMP), which protects groundwater in the Truckee area. The Truckee Development Code and GPU include policies to support both of these plans. As such, the 2040 GPU EIR determined buildout of the GPU would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts to the Basin Plan and Martis Valley GMP would be less than significant.

As previously noted, the 2040 GPU EIR concluded that while buildout of the GPU would increase demand for water, the increase in demand has been anticipated in the UWMP. Because the proposed project is consistent with the GPU, development of the project site was generally included in the UWMP analysis. Considering that the UWMP anticipated buildout of all currently undeveloped parcels within the Town, and that the available water supply far exceeds anticipated demand, adequate water supply exists to serve the project without resulting in a significant decrease in the available water supplies such that the project may interfere with management of the MVGB.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

c.i-iii. As discussed in the 2040 GPU EIR, development that would occur under the GPU would result in changes to stormwater drainage patterns and an increase in impervious surface area that could increase the rate and quantity of stormwater runoff. With adherence to the Town's Development Code, policies in the GPU, and the Town's NPDES MS4 permit requirements, the 2040 GPU EIR concluded that development of the GPU would result in a less-than-significant impact with respect to substantially altering 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 result in substantial erosion, siltation, or flooding on- or off-site, creating or contributing runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or providing substantial additional sources of polluted runoff.

The Public Improvement and Engineering Standards (TOT Standards) include requirements relative to drainage design for projects. The TOT Standards, in addition to project-specific design criteria, and the standards of the Town of Truckee Storm Water Quality Plan (TOT SWQP), as approved by the RWQCB, largely comprise the overall design requirements to which the proposed project shall adhere.

As discussed in question 'a' above, stormwater from the project site would be treated onsite and during storm events, excess water would be discharged via overflow drains. Additionally, the proposed project would include multiple landscaped areas within the open space areas, which would allow for natural percolation of stormwater runoff. In addition, the proposed project would also be required to include temporary and permanent BMPs that have been designed to meet all applicable criteria and would promote water quality, mitigate peak flow increase, and ensure safety of structures.

Furthermore, GPU Policy LU-5.6 requires new infrastructure and development to be designed to manage stormwater runoff and minimize or eliminate harmful impacts to water quality; riparian, wetland, and meadow habitats; and properties prone to flooding. In conjunction with the submittal of project improvement plans, the developer would be required to submit a drainage report that includes pre- and post-development hydrology calculations, as well as calculations for the required treatment areas to ensure that the on-site drainage system complies with the Town of Truckee Post-Construction Storm Water Quality Plan/State Municipal Phase 2 Stormwater General Permit, and any other applicable regulations at time of permit issuance. The drainage report would be submitted to the Town of Truckee for review and approval in accordance with GPU Policy LU-5.6. Compliance with the aforementioned regulations would ensure that the proposed project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion, siltation, or flooding on- or off-site, 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.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

civ. According to the 2040 GPU EIR, development that would occur under the GPU would result in changes to stormwater drainage patterns and an increase in impervious surface area that could increase the rate and quantity of stormwater runoff. The GPU contains policies to protect drainageways, including GPU Policies COS-7.1 and COS-2.2, which establish setbacks from the Truckee River and other waterways that would limit the potential for future development to substantially alter the course of these drainages. Adhere to the above GPU policies would limit the potential for new development to generate increased runoff that would substantially affect drainage patterns. Furthermore, given the minimal relative increase in impervious surface in the policy area, adherence to the Town's Development Code and policies in the GPU, the 2040 GPU EIR concluded that impacts related to drainage pattern alterations that would impede or redirect flood flows would be less than significant.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for the project site, the project site is located outside of any documented Special Flood Hazard Areas (SFHA). Furthermore, as previously noted, in compliance with Development Code Section 18.30.050, a drainage and erosion control plan would be prepared for the proposed project, which would ensure that development of the proposed project would not impede or redirect flood flows.

Based on the above information, the proposed project would not impede or redirect flood flows and would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

d. According to the 2040 GPU EIR, some topographically lower areas within the Town adjacent to waterbodies are located within the 100-year flood zone and could experience hazards associated with floods. Additionally, areas adjacent to lakes and reservoirs in the GPU area could experience flooding due to seiche. However, the potential risk of seiche

is low in Truckee due to the relatively low levels of seismic activity locally as compared with other areas of California and the smaller size of the lakes and reservoirs in the Truckee area. In addition, the 2040 GPU EIR determined that the town is not at risk for tsunamis due to the town's inland location. As such, the 2040 GPU EIR does not further discuss impacts related to tsunamis.

As discussed in the 2040 GPU EIR, areas located downstream from the five dams in the GPU area could flood during a dam failure. As such, potential flood events could risk release of pollutants. Each dam has the potential to fail and to release a volume of water that could result in severe short-term flooding; however, Truckee would not be significantly affected by potential inundation because Truckee is located above most of the dams. In addition, existing Development Code and policies in the GPU discourage development within flood zones and strive to reduce hazards to existing development. Therefore, the 2040 GPU EIR determined that impacts related to flooding would be less than significant.

As discussed under question 'civ' above, the proposed project is not located within an SFHA. Tsunamis are defined as sea waves created by undersea fault movement, whereas a seiche is a long-wavelength, large-scale wave action set up in a closed body of water such as a lake or reservoir. The project site is not located in proximity to a coastline and would not be potentially affected by flooding risks associated with tsunamis. The project site is located approximately 3.43 miles east from Donner Lake which could be prone to seiches due to seismic activity. However, as discussed above, the 2040 GPU EIR concluded that the potential risk of seiche is low in Truckee due to the relatively low levels of seismic activity in the area.

Based on the above information, the proposed project would not result in new significant impacts related to related to the release of pollutants due to project inundation due to flooding, tsunami, or seiche or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

XI. LAND USE AND PLANNING. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Physically divide an established community?	No	No	No
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?	No	No	No

Discussion

a. A project risks dividing an established community if the project would introduce infrastructure or alter land use to change the land use conditions in the surrounding community or isolate an existing land use.

According to the 2040 GPU EIR, development pursuant to the GPU and Downtown Truckee Plan would not physically divide any established communities. Policies and land use changes would facilitate and direct growth and expansion of existing or planned communities in an efficient and orderly manner. GPU policies also would minimize potentially incompatible land uses in planned communities and enhance connectivity between communities. As a result, the 2040 GPU EIR concluded that impacts to established communities would be less than significant.

The project site is generally surrounded by residential areas, manufacturing and industrial uses and the California Highway Patrol building. Development of the site with buildings intended for service commercial uses would be a continuation of the existing facilities located in proximity to the project site and would not isolate an existing land use. Furthermore, the proposed project is consistent with the site's existing land use and zoning designations and, thus, is consistent with the type and intensity of development that has previously been anticipated for the site by the Town and analyzed in the 2040 GPU EIR.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b. According to the 2040 GPU EIR, the GPU would require modifications to the Town's Zoning Ordinance to provide consistency between the GPU and zoning; however, such modifications would not remove or adversely modify portions of the Municipal Code that were adopted to mitigate an environmental effect. As such, the 2040 GPU EIR concluded that buildout of the GPU would not 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, and a less-than-significant impact would occur.

The proposed project is consistent with the site's current 2040 GPU land use designation of Commercial and zoning designation of Service Commercial. As discussed throughout this Modified Initial Study, the proposed project would not conflict with Town policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including, but not limited to, the Town's noise standards and applicable SWRCB regulations related to stormwater. Therefore, the proposed project would not cause a significant environmental impact in excess of what has already been analyzed and anticipated in the 2040 GPU EIR, and would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

XII. MINERAL RESOURCES. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
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?	No	No	No
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?	No	No	No

Discussion

a,b. Aggregate mining operations in the Town are currently limited to the aggregate mining area at the Martis Valley Quarry in the eastern portion of Truckee. According to the 2040 GPU EIR, areas of the town contain known mineral resources, particularly along the Truckee River. The 2040 GPU EIR determined that buildout of the GPU could result in a significant impact if it would result in the loss of availability of a mineral resource that would be of value to the region and the residents of the State. However, the GPU reduces the potential for implementation of the GPU to result in the loss of mineral resources through the designation of much of the land with mapped mineral resources as Resource Conservation/Open Space and Public and including policies that restrict uses in such areas to those compatible with mineral resource extraction. As such, the 2040 GPU EIR determined that impacts related to the loss of availability of a known mineral resource would be less than significant.

According to Figure 4.12-1 of the 2040 GPU EIR, the project site is not located in an area with important mineral resources. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the State or 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.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts than the 2040 GPU EIR. As a result the

proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

XIII. NOISE. *Would the project result in:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
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?	No	No	No
b. Generation of excessive groundborne vibration or groundborne noise levels?	No	No	No
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?	No	No	No

Discussion

a. The following discussion is based primarily on a Noise Technical Study prepared for the proposed project by Saxelby Acoustics (see Appendix B). The discussions below present information regarding sensitive noise receptors in proximity to the project site, the existing noise environment, and the potential for the proposed project to result in impacts during project construction and operation. The following terms are referenced in the sections below:

- Decibel (dB): A unit of sound energy intensity. An A-weighted decibel (dBA) is a decibel corrected for the variation in frequency response to the typical human ear at commonly encountered noise levels. All references to dB in this section will be A-weighted unless noted otherwise.
- Day-Night Average Level (L_{dn}): The average sound level over a 24-hour day, with a +10 decibel weighing applied to noise occurring during nighttime (10:00 PM to 7:00 AM) hours.
- Equivalent Sound Level (L_{eq}): The average sound level over a given time-period.
- Maximum Sound Level (L_{max}): The maximum sound level over a given time-period.
- Median Sound Level (L_{50}): The sound level exceeded 50 percent of the time over a given time-period.
- Community Noise Equivalent Level (CNEL): The 24-hour average noise level with noise occurring during evening (7:00 PM to 10:00 PM) hours weighted by a factor of three and nighttime hours weighted by a factor of ten prior to averaging.

Sensitive Noise Receptors

Some land uses are considered more sensitive to noise than others. Land uses often associated with sensitive receptors generally include residences, schools, libraries, hospitals, and passive recreational areas. Sensitive noise receptors may also include threatened or endangered noise sensitive biological species, although many jurisdictions have not adopted noise standards for wildlife areas. Noise sensitive land uses are typically

given special attention in order to achieve protection from excessive noise. The nearest noise sensitive receptor to the project site would be the existing mobile home park directly north of the project parcel.

Existing Noise Environment

The existing noise environment in the project area is primarily defined by traffic on I-80 and Pioneer Trail. In order to assess the existing ambient noise environment within the project vicinity, Saxelby Acoustics conducted two long-term (24-hour) noise measurements at separate locations on the project site (LT-1 and LT-2) and one short term measurement on the site (ST-1). The noise measurement locations are shown on Figure 4. A summary of the long-term noise level measurement survey results is provided in Table 9 and a summary of the short-term noise level measurement survey results are provided in Table 10.

Table 9
Summary of Existing Background Long-Term Noise Measurement Data

Site	Date	L_{dn}	Daytime			Nighttime		
			L_{eq}	L_{50}	L_{max}	L_{eq}	L_{50}	L_{max}
LT-1	1/8/25	68	64	63	73	60	58	72
LT-2	1/8/25	58	54	53	65	51	50	62

Notes:
- All values shown in dBA
- Daytime hours: 7:00 AM to 10:00 PM
- Nighttime Hours: 10:00 PM to 7:00 AM

Source: Saxelby Acoustics, 2025.

Table 10
Summary of Existing Background Short-Term Noise Measurement Data

Site	Date	L_{eq}	L_{50}	L_{max}
ST-1	1/7/25	67	46	76

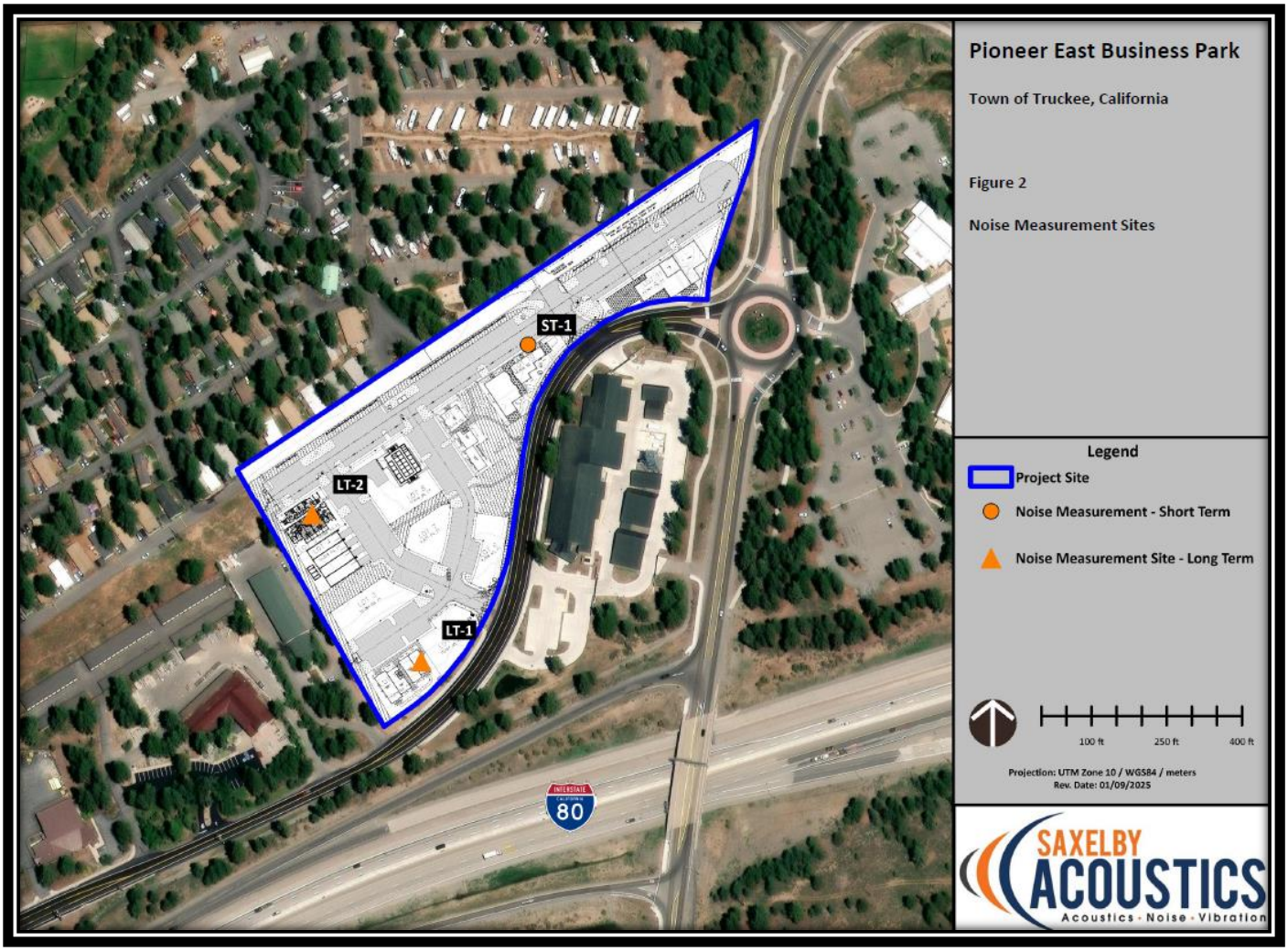
Notes: All values shown in dBA

Source: Saxelby Acoustics, 2025.

Standards of Significance

According to Table 4.13-9 of the 2040 GPU EIR and Table SN-1 of the GPU, the Town's exterior noise standards for low-density single-family residential uses range between 50 dB and 70 dB L_{dn}/CNEL. The GPU considers 50 dB L_{dn}/CNEL to 60 dB L_{dn}/CNEL to be "Normally Acceptable", and 60 dB L_{dn}/CNEL to 70 dB L_{dn}/CNEL is the "Conditionally Acceptable." Ambient noise in excess of 70 dBA L_{dn}/CNEL is considered "Unacceptable."

Figure 4



Noise Measurement Locations

The Development Code includes noise level performance criteria applicable to non-transportation noise sources. Section 18.44.040 of the Development Code states that exterior noise levels, when measured at a noise-sensitive receiving land use, shall not exceed the noise level standards set forth in Table 3-6 in the Development Code and Table 4.13-4 of the 2040 GPU EIR. Specifically, the L_{max} for residential uses during the daytime (7:00 AM to 10:00 PM) is 75 dBA L_{max} and the L_{max} for residential uses during the nighttime (10:00 PM to 7:00 AM) is 70 dBA L_{max}. In the event that the ambient noise environment exceeds the standards, the applicable standards shall be adjusted to equal the ambient noise level. In addition, the noise level standards shall be reduced by five dB for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. With a five dB reduction, the noise standard for residential uses is 70 dBA L_{max} during the daytime and 65 dBA L_{max} during the nighttime. Furthermore, as set forth in Table 3-6 in the Development Code and Table 4.13-4 of the 2040 GPU EIR, the measured noise levels at residential uses may not exceed 55 dBA L_{50} during the daytime (7:00 AM to 10:00 PM) and 50 dBA L_{50} during the nighttime (10:00 PM to 7:00 AM) for more than 30 minutes.

In practice, a noise impact may be considered significant if the project would generate noise that would conflict with local project criteria or ordinances, or substantially increase noise levels at noise sensitive land uses. Research into the human perception of changes in sound level indicates the following: a 3 dB change is barely perceptible; a 5 dB change is clearly perceptible; and a 10 dB change is perceived as being twice or half as loud.

Finally, the Federal Interagency Committee on Noise (FICON) has developed a graduated scale for use in the assessment of project-related noise level increases, which the Noise Technical Study employed to assess noise level increases resulting from traffic associated with buildout of the proposed project. The criteria shown in Table 11 were developed by FICON as a means of developing thresholds for impact identification for project-related noise level increases.

Table 11
FICON Significance of Changes in Noise Exposure

Ambient Noise Level Without Project, L_{dn}	Increase Required for Significant Impact
<60 dB	+5.0 dB or more
60 to 65 dB	+3.0 dB or more
>65 dB	+1.5 dB or more

Source: Ascent, 2024.

The FICON standards have been used extensively in recent years in the preparation of noise sections of EIRs that have been certified by lead agencies in California. The use of FICON standards is considered conservative, relative to thresholds used by other agencies in the State. For example, the California Department of Transportation (Caltrans) requires a project-related traffic noise level increase of 12 dB for a finding of significance, and the California Energy Commission (CEC) considers project-related noise level increases between five to 10 dB significant, depending on local factors. Therefore, the use of the FICON standards, which set the threshold for finding of significant noise impacts as low as 1.5 dB, provides a conservative approach to impact assessment for the proposed project.

Although the Town of Truckee has not adopted noise limits for construction activities, pursuant to Town of Truckee Development Code Section 18.44.040, and in general conformance with the construction noise analysis conducted in the 2040 GPU EIR, construction noise levels at a noise-sensitive receiving land use shall not exceed the noise level standards set forth in Table 3-6 of the Development Code and Table 4.13-4 of the 2040 GPU EIR. Specifically, the L_{max} for residential uses during the daytime (7:00 AM to 10:00 PM) is 75 dBA L_{max} and the L_{max} for residential uses during the nighttime (10:00 PM to 7:00 AM) is 70 dBA L_{max}.

Impact Analysis

The following analysis relies on the aforementioned thresholds of significance to determine if noise impacts associated with construction and operation of the proposed project would occur.

Project Construction Noise

As discussed in the 2040 GPU EIR, buildout of the GPU could result in construction activities in close proximity to existing noise-sensitive receptors. Most noise-generating construction activity would be performed during the daytime, construction-noise-exempt hours per Section 18.44.070 of the Development Code; however, construction activity may be required during the evening and nighttime hours. Some projects within the GPU planning area could require activities such as large continuous concrete pours outside of the exemption timeframe established within Section 18.44.070 of the Development Code. Potential nighttime construction activities could expose nearby noise-sensitive receptors to noise levels that exceed Development Code Section 18.44.040 nighttime exterior noise standards as identified in Table 4.13-4 of the 2040 GPU EIR. However, according to Section 18.44.070 of the Development Code, such criteria do not apply to construction noise sources associated with single-family residential construction (such as the nearest sensitive receptors to the project site; i.e., single-family residential uses to the north of the project site), provided that the activities do not take place before 7:00 AM or after 9:00 PM on any day, except Sunday, or before 9:00 AM or after 6:00 PM. Nevertheless, GPU Policy SN-8.19 would implement noise reduction measures to minimize construction noise and reduce noise exposure during noise-sensitive time periods. However, because the Town cannot ensure that all impacts would be reduced to meet Town noise standards during any potential nighttime construction activity, the 2040 GPU EIR concluded that impacts related to the construction would be significant and unavoidable.

During construction of the proposed project, heavy-duty equipment would be used for grading, excavation, and paving, which would result in temporary noise level increases. Project haul truck traffic on local roadways would also result in a temporary noise level increase during construction activities. Noise levels would vary depending on the type of equipment used, how the equipment is operated, and how well the equipment is maintained. In addition, noise exposure at any single point outside the project site would vary depending on the proximity of construction activities to that point. According to the Noise Technical Study, construction equipment may include dump trucks, loaders, air compressors, concrete mixers, cranes, dozers, graders, pavers, roller, and pickup trucks would be used on-site.

Table 12 shows maximum noise levels associated with the aforementioned construction equipment. Based on the table, activities involved in typical construction would generate maximum noise levels ranging from 75 to 90 dB at a distance of 50 feet. Noise-generating construction activities that occur during the more noise-sensitive evening and nighttime

hours are of increased concern. Because exterior ambient noise levels typically decrease during the late evening and nighttime hours as traffic volumes and commercial activities decrease, and because typical sleep hours occur during these times, construction activities performed during these more noise-sensitive periods of the day can result in increased annoyance and potential sleep disruption for occupants of residential uses.

Table 12
Construction Equipment Noise

Type of Equipment	Maximum Level, dB at 50 feet
Auger Drill Rig	84
Backhoe	78
Compactor	83
Compressor (air)	78
Concrete Saw	90
Dozer	82
Dump Truck	76
Excavator	81
Genrator	81
Jack Hammer	89
Pneumatic Tools	85

Source: Roadway Construction Noise Model User's Guide. Federal Highway Administration. FHWA-HEP-05-054. January 2006.

Construction generally occurs in several distinct stages, each phase requiring a specific complement of equipment with varying equipment type, quantity, and intensity. Such variations in the operational characteristics of the equipment change the effect they have on the noise environment of the project site and in the surrounding area for the duration of the construction period.

Based on the reference noise levels listed in Table 12 and the typical usage factors of the individual pieces of equipment modeled, on-site construction-related activities could generate a maximum construction noise level of up to 76 dBA at adjacent sensitive receptor sites. This would exceed existing maximum noise levels by 3 dBA, which would not meet the 12 dBA over existing ambient noise levels that would be required to make a finding of significance. The Town would also consider construction noise conditionally exempt 7:00 a.m. to 9:00 p.m. Monday through Saturday and 9:00 a.m. to 6:00 p.m. on Sundays. This project has been conditioned to only allow construction during these hours, further reducing potential impacts to sensitive receptors.

Construction of the proposed project would be required to comply with limited construction hours set forth within Section 18.44.070 of the Development Code. The project would also comply with GPU Policy SN-8.14, which includes standard construction noise control measures to be included as requirements at construction sites in order to minimize construction noise impacts. For example, construction noise control measures set forth in GPU Policy SN-8.14 include, but are not limited to, locating stationary noise-generating equipment as far as possible from sensitive receptors in the project vicinity and adding mufflers to noise-generating equipment to reduce noise levels.

In addition, consistent with GPU Policy SN-8.14 and Development Code Section 18.44.070, the Noise Technical Study prepared for the proposed project includes recommended measures to reduce noise exposure from construction activities at the nearby sensitive receptors. Thus, in order to ensure that construction noise impacts

associated with development of the proposed project would not be a nuisance, consistent with GPU Policy SN-8.14 and Development Code Section 18.44.070, the Town would require the following standard condition of approval for the proposed project to ensure all recommendations included in the Noise Technical Study are implemented as part of the proposed project:

> Prior to approval of grading permits, the following criteria shall be established and noted on grading plans, subject to review and approval by the Town of Truckee Community Development Department:
>
> - Construction activity shall not occur before 7:00 AM or after 9:00 PM on any day except Sunday, or before 9:00 AM or after 6:00 PM on Sunday.
> - All internal combustion engine driven equipment shall be equipped with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
> - Stationary noise-generating equipment shall be located as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.
> - "Quiet" air compressors and other stationary noise-generating equipment shall be used 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 shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall 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.

Incorporation of the aforementioned condition of approval would ensure project compliance with GPU Policy SN-8.14 and Development Code Section 18.44.070, thus, ensuring that construction noise associated with the proposed project would not be a nuisance.

Project Operational Noise

Operations associated with the proposed development would generate noise primarily associated with vehicle traffic along the local roadways as well as stationary sources at the project site. Such noise sources are discussed in the sections below.

Traffic Noise on Nearby Roadways

As discussed in the 2040 GPU EIR, implementation of development associated with the GPU would result in an increase in traffic throughout the roadway network, thus, increasing traffic noise. A comparison of existing (2018) and future (2040) traffic noise identified four roadway segments that would surpass Federal Transit Administration (FTA) guidance related to incremental traffic noise standards and two roadway segments that would surpass the Town's 60 CNEL noise compatibility threshold as a result of GPU implementation. Due to the limited project-specific information currently available for future development projects in the GPU planning area, the 2040 GPU EIR could not feasibly determine whether noise levels could be mitigated to the appropriate extent. For this reason, the 2040 GPU EIR concluded that impacts would be significant and unavoidable.

The FICON guidelines, noted in Table 11, specify criteria to determine the significance of traffic noise impacts. Where existing traffic noise levels are greater than 65 dB $L_{dn,}$ a + 1.5 dB L_{dn} increase in roadway noise levels would be considered significant. According to the study prepared by Saxelby Acoustics, the maximum increase in traffic noise at the nearest sensitive receptors would be 0.4 dBA, falling well short of the levels deemed to be significant.

Based on the above, traffic-related noise levels generated as part of project operation would not result in a substantial permanent increase in ambient noise levels in the project vicinity in excess of applicable standards.

On-Site Noise Sources

As discussed in the 2040 GPU EIR, various types of new stationary noise sources would be implemented in the town as a result of GPU buildout (e.g., parking lots, loading docks, heating and air conditioning systems). The Development Code limits loading dock activity during noise-sensitive times of day and establishes noise standards for HVAC equipment. Additionally, if future development projects are located within areas of high existing noise levels or have the potential to expose sensitive land uses to noise levels that exceed applicable standards, the development would not be approved. Furthermore, the GPU would involve the implementation of several policies designed to reduce potential noise impacts throughout the town. Therefore, the 2040 GPU EIR concluded that less-than-significant impacts would occur.

The proposed project consists of the operation 11 new buildings including 10 buildings containing commercial uses and one residential building. In addition to increased traffic on nearby roadways, the primary noise sources associated with implementation of the project would consist of HVAC equipment and on-site vehicle circulation at the parking lot.

To assess the significance of permanent project-related noise level increases at the existing residences, Saxelby Acoustics uses the FICON noise level increase criteria. In noise environments with an existing average of less than 60 dBA L_{eq}, a +5.0 dBA increase would be considered significant. Where existing average noise levels are less than 65.0 but greater than or equal to 60.0, a +3.0 dBA increase would be considered significant. Where existing average noise levels are greater than 65.0 dBA, a +1.5 dBA increase would be considered significant.

The existing average noise levels at the residential uses to the north of the project are 54 dBA L_{eq} during daytime (7:00 a.m. to 10:00 p.m.) hours and 51 dBA L_{eq} during nighttime (10:00 p.m. to 7:00 a.m.) hours. Addition of project-generated noise levels to the existing noise levels is calculated using logarithmic summation. The daytime existing noise level (54 dBA) plus project (54 dBA) noise level would be 57.0 dBA. This would be a 3.0 dBA increase, which is less than the significance criterion of +5.0 dBA. The nighttime existing noise level (51 dBA) plus project (44 dBA) noise level would be 51.8 dBA. This would be a 0.8 dBA increase, which is less than the significance criterion of +5.0 dBA.

Therefore, noise generated from parking lot activities would not exceed the Town's exterior daytime or nighttime standards or result in a substantial permanent increase in noise.

Conclusion

As described above, the proposed project would not result in the 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, the Development Code, or applicable standards of other agencies.

Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As such, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

b. Similar to noise, vibration involves a source, a transmission path, and a receiver. However, noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to the vibration depends on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system which is vibrating.

As discussed in the 2040 GPU EIR, construction activities associated with GPU implementation could generate short-term increases in vibration near sensitive receptors throughout the Town based on each project's location. The GPU and Development Code would limit construction activity to particular times of day when sensitive receptors would not be as affected by ground borne vibration. In addition, GPU Policy SN-8.20 would require implementation of measures to reduce impacts from construction vibration. However, due to the current lack of project-specific information including location and construction equipment type, the 2040 GPU EIR could not conclude whether any substantial impacts would result from construction that is consistent with the GPU.

Similarly, implementation of the GPU could expose new sensitive receptors to elevated levels of vibration due to railroad operations. Because project-specific details for future development projects within the GPU planning area are not known at this time, the GPU could not conclude whether sensitive receptors would be subject to substantial levels of ground borne vibration and if GPU policies would reduce those levels of vibration to an acceptable level. Thus, the 2040 GPU EIR concluded that impacts related to vibration would be significant and unavoidable.

Vibration is measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration in terms of peak particle velocities (PPV) in inches per second (in/sec). Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of PPV. Human and structural response to different vibration levels is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. Table 13, which was developed by the California Department of Transportation (Caltrans), shows that the vibration levels that would normally be required to result in damage to structures range from 0.2 to 0.6 in/sec PPV. The general threshold at which human annoyance could occur is 0.10 in/sec PPV.

Table 13
Effects of Vibration on People and Buildings

PPV		Human Reaction	Effect on Buildings
mm/sec	in/sec		
0.15 to 0.30	0.006 to 0.019	Threshold of perception; possibility of intrusion	Vibrations unlikely to cause damage of any type
2.0	0.08	Vibrations readily perceptible	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected
2.5	0.10	Level at which continuous vibrations begin to annoy people	Virtually no risk of "architectural" damage to normal buildings
5.0	0.20	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relative short periods of vibrations)	Threshold at which there is a risk of "architectural" damage to normal dwelling - houses with plastered walls and ceilings. Special types of finish such as lining of walls, flexible ceiling treatment, etc., would minimize "architectural" damage
10 to 15	0.4 to 0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause "architectural" damage and possibly minor structural damage

Source: Caltrans. Transportation Related Earthborne Vibrations. TAV-02-01-R9601. February 20, 2002.

The primary vibration-generating activities associated with the proposed project would occur during grading, parking lot construction and placement of underground utilities. As noted earlier, a majority of these improvements have already occurred, but are being analyzed under a worst case scenario to ensure compliance with vibration standards. Table 14 shows the typical vibration levels produced by construction equipment at various distances. The most substantial source of ground borne vibrations associated with project construction would be the use of vibratory compactors. Use of vibratory compactors/rollers could be required during construction of the proposed on-site drive aisles and parking lot. As discussed in the Noise Technical Study, project construction would not involve the use of ground vibration-intensive activities, such as pile driving or blasting. Pieces of equipment that generate lower levels of ground vibration, such as dozers and pavers, would be used during construction and do not generate substantial levels of ground vibration that could result in structural damage, except at extremely close distances (i.e., within at least 10 feet). The proposed project would only cause elevated vibration levels during construction, as the project would not involve any uses or operations that would generate substantial ground borne vibration.

Table 14
Vibration Levels for Various Construction Equipment

Type of Equipment	PPV at 25 feet (in/sec)	PPV at 50 feet (in/sec)	PPV at 100 feet (in/sec)
Large Bulldozer	0.089	0.031	0.011
Loaded Trucks	0.076	0.027	0.010
Small Bulldozer	0.003	0.001	0.000
Auger/Drill Rigs	0.089	0.031	0.011

Jackhammer	0.035	0.012	0.004
Vibratory Hammer	0.070	0.025	0.009
Vibratory Compactor/roller	0.210	0.074	0.026
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Guidelines, May 2006.			

As presented in Table 12, construction vibration levels anticipated for the project would be less than the 0.2 in/sec threshold at distances of 26 feet or more. The nearest sensitive receptors to the project site include the existing mobile home park residences located approximately adjacent to the project site to the north. Therefore, according to the vibration levels shown in Table 14, ground borne vibration levels at the nearest buildings would be less than the 0.20 in/sec PPV threshold established by Caltrans for architectural damage to buildings.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to ground vibrations than what were previously analyzed in the 2040 GPU EIR. Thus, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

c. As discussed in the 2040 GPU EIR, the GPU would not locate sensitive land uses within a 60 CNEL aircraft noise contour of the Truckee Tahoe Airport. Additionally, GPU Policies SN-8.16 and SN-8.17 would require compliance with the adopted Truckee Tahoe Airport LUCP and coordination with Truckee Tahoe Airport District and Truckee Tahoe Airport Land Use Commission to ensure noise standards are met. Furthermore, Section 18.44.070 of the Development Code exempts public transportation facilities, including airports, from the provisions in the noise chapter. As such, the 2040 GPU EIR concluded that a less-than-significant impact would occur.

The Truckee Tahoe Airport LUCP regulates the land surrounding the airport to avoid establishing noise-sensitive land uses in the vicinity of the Truckee Tahoe Airport. The Truckee Tahoe Airport LUCP noise standards are enforced by GPU Policy SN-8.16. In addition, GPU Policy SN-7.5 requires the Town to maintain land use and development patterns in the vicinity of Truckee Tahoe Airport that are consistent with the adopted LUCP, including setbacks and height requirements. As previously discussed, the Truckee Tahoe Airport is located approximately 1.47 miles (7,759 feet) northwest of the project site.

Based on Exhibit 3-4 of the Truckee Tahoe Airport LUCP, the project site is located within the Truckee Tahoe Airport Influence Area, but is outside of the LUCP's 60 dBA CNEL noise contour. Thus, development of the proposed project would not result in new sensitive land uses within the 60 CNEL aircraft noise contour of the Truckee Tahoe Airport, and the proposed project would not conflict with GPU Policy SN-8.16 or the recommendations of the Truckee Tahoe Airport LUCP. Overall, the Noise Technical Study determined that surrounding noise exposure levels to the development would comply with GPU Policy SN-8.16, and the Land Use Compatibility standards of the GPU and the Truckee Tahoe Airport LUCP.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to excessive noise levels caused by aviation than what were previously analyzed in the 2040 GPU EIR. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

XIV. POPULATION AND HOUSING. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?	No	No	No
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No	No	No

Discussion

a. According to the 2040 GPU EIR, buildout of the GPU would facilitate new residential development in Truckee, which would accommodate an increase in the population to an estimated 20,100 by the year 2040 and an estimated 23,200 at buildout beyond 2040. Because projected development under the GPU would result in population growth consistent with estimated population projections, the 2040 GPU EIR concluded that impacts related to substantial unplanned population growth would be less than significant.

The proposed project includes the construction of five commercial buildings and one residential building, totaling approximately 52,183 sf. The project's total amount of commercial floor area is 78,500 sf and residential floor area is 14,676 sf once all buildings are constructed. The residential building will include a mix of 22, studio, 1- and 2- bedroom apartments to accommodate local workforce housing. The project is projected to include 3,925 sq ft of general manufacturing, 3,925 sq ft of wholesale distribution, 11,775 sq ft of warehouse space, 5,493 sq ft of indoor food service, 3,043 sq ft of specialty retail, and 50,339 sq ft of vacant commercial space anticipated to be used as office space. Therefore, the project would directly induce population growth through the construction of the residential building. While the proposed project will create new jobs in the area, which could potentially result in an increase in housing demand, such an increase would be somewhat offset by the construction of the residential building for workforce housing on site. As such, the proposed project would create employment, but would not lead to a large influx of new residents to the project area.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the 2040 GPU EIR. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b. According to the 2040 GPU EIR, buildout of the GPU would facilitate the development of new housing in accordance with State and local housing requirements. Although future redevelopment projects within the Town could displace residents temporarily during construction activities, the displacement would not be widespread. The 2040 GPU EIR concluded that potential impacts related to displacement of people or housing, such that construction of replacement housing would be required, would be less than significant.

The proposed project would not require the demolition of any existing housing within the project site. As such, the proposed project would not displace a substantial number of existing housing units or people, and would not necessitate the construction of replacement housing elsewhere. Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were

analyzed in the 2040 GPU EIR. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

XV. PUBLIC SERVICES.

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:	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Fire protection?	No	No	No
b. Police protection?	No	No	No
c. Schools?	No	No	No
d. Parks?	No	No	No
e. Other Public Facilities?	No	No	No

Discussion

a,b. Fire protection services are currently provided to the surrounding area by the Truckee Fire Protection District (TFPD). TFPD Station 91 is the nearest fire station to the project site and is located at 10049 Donner Pass Road, approximately 0.78 miles southwest of the project site. Additionally, the Truckee Police Department provides law enforcement services to the project area and is located at Town Hall at 10183 Truckee Airport Road, approximately 2.09 miles southeast of the project site.

The 2040 GPU EIR concluded that while projected development under the GPU would increase demand for fire protection services, excess capacity exists within the TFPD, and new and expanded facilities have been identified to serve the anticipated demand. Furthermore, with respect to fire protection services, the Public Safety Element of the GPU includes several policies, such as Policies SN-1.3, SN-2.2 through 2.4, SN-2.12, and SN-2.13 that would reduce potential impacts to fire and emergency services. For example, Policy SN-1.3 directs the Town to actively support the efforts to maintain and improve federal and state fire service capacity in the town.

In addition, the 2040 GPU EIR determined that projected development under the GPU would increase demand for law enforcement services, but would not result in the need to construct new law enforcement facilities. Furthermore, GPU Policy LU-5.5 would require the Town to review all development proposals to ensure that demand generated for police services can be adequately met. As such, the 2040 GPU EIR determined that buildout of the GPU would result in a less-than-significant impact related to fire and police protection services.

While the proposed project could result in increased demands on fire and police protection services, such demands would be consistent with what has been anticipated by the Town and analyzed in the 2040 GPU EIR. Furthermore, the project would comply with all applicable State and local requirements related to fire safety and security, including installation of fire sprinklers. Compliance with such standards would minimize fire and police protection demands associated with the project. In addition, the project would be

subject to payment of applicable fire and police development impact fees, which would help account for any increased demands on fire or police protection services that may result from the proposed project.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to fire or police protection facilities than what were previously analyzed in the 2040 GPU EIR. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

c. School services in the town are provided by the Tahoe-Truckee Unified School District (TTUSD). TTUSD operates 12 schools within the service area including five elementary schools, two middle schools, two high schools, and three alternative educational programs. With respect to schools, the 2040 GPU EIR concluded that projected development under the GPU could increase student enrollment. However, the payment of state-mandated school impact fees would mitigate any impacts to a less-than-significant level. Due to the construction of the residential building, the proposed project would directly generate new residents in the town. The proposal includes a majority of the housing units to be studio and one-bedroom apartments, which would be less likely to attract families with school age children. Thus, the nominal increase in housing caused by development of the proposed project would not significantly increase demand for school facilities and services.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the 2040 GPU EIR related to the need for new or physically altered schools, the construction of which could cause significant environmental impacts. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

d. With respect to parks, the GPU 2040 EIR determined that the development of parks is within the scope of the changes to the physical environment anticipated with buildout of the GPU. As such, any adverse environmental impacts related to the development of parks would be addressed through compliance with the GPU policies and actions developed to protect environmental resources, as well as any project-specific mitigating measures. Thus, impacts to parks as a result of the GPU would be less than significant.

The proposed project would include 22 multi-family units, which would be required to pay recreation and park district impact fees to help the Town meet its parks and recreation goals. Additionally, the subdivision of the residential lot would require the payment of Quimby Fees to assist the recreation and park district in the acquisition of new land. As stated in the 2040 GPU EIR, the Town strives to maintain at least five acres of parkland for every 1,000 residents. According to the 2040 GPU, in 2018, the population of Truckee was approximately 16,400, and the town provided approximately six acres of parkland per 1,000 residents (i.e., a total of 104.9 acres). As such, the Town is still well within their goal of maintaining five acres of parkland per 1,000 residents. Because the proposed project includes only 22 units of housing, it would not directly generate a substantial amount of new residents. Therefore, the proposed project would not be anticipated to increase the population such that the Town's parkland requirement would no longer be met.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in

the 2040 GPU EIR related to the need for new or physically altered parks, the construction of which could cause significant environmental impacts. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

e. According to the 2040 GPU EIR, other public services facilities that may be required to serve buildout of the GPU and DTP would not result in substantial adverse impacts beyond those evaluated throughout the 2040 GPU EIR. Additional public services facilities, such as libraries, would be generally located within established neighborhoods and near other public services that serve the communities and would not be expected to result in substantial adverse effects beyond those evaluated in the 2040 GPU EIR. Impacts related to other types of government facilities were not discussed further in the 2040 GPU EIR. The 2040 GPU EIR concluded that with implementation of applicable GPU policies, implementation of the GPU would result in a less-than-significant impact to public facilities such as libraries.

The Truckee Branch Library is located at 10031 Levon Avenue, approximately 1.43 miles southwest of the project site, and is open Monday through Saturday. Because the proposed project does not include a substantial number of new residences, the proposed project would not directly generate new residents in the town and increase demand for other public facilities, such as libraries.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the 2040 GPU EIR related to the need for new or physically public facilities, the construction of which could cause significant environmental impacts. Thus, the proposed project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

XVI. RECREATION. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
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?	No	No	No
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?	No	No	No

Discussion

a,b. The 2040 GPU EIR evaluated the potential for implementation of the GPU to increase the use of recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated and evaluates whether the project includes recreational facilities or would require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. As discussed in the 2040 GPU EIR, the GPU includes a proposed policy that is consistent with the requirements of the Quimby Act for provision of parkland. Furthermore, the availability of recreation opportunities provided by State and federal public lands minimizes demand for parks and reduces the potential for physical deterioration of existing parks as a result of overuse. Furthermore, new or expanded parks within the town would be required to support growth anticipated through the GPU horizon. Such facilities would be located within the portions of the town identified for potential development and would be subject to applicable GPU policies and actions. Overall, the 2040 GPU EIR concluded that impacts to recreational facilities would be less than significant.

Currently, Truckee includes an ample amount of community and recreation facilities. For example, the proposed project would be located adjacent to the Truckee Donner Recreation and Park District's Recreation and Aquatic Center. Additionally, Truckee includes recreation facilities run by the Truckee Donner Recreation and Park District, such as the Truckee River Regional Park and the Community Arts Center. Additional community and recreation facilities in Truckee include the Meadow Park, Riverview Sports Park, Truckee Community Pool, and Truckee Bike Park, and a total of 101 miles of bicycle trails and facilities. Due to the nature of the proposed project and the ample amount of existing recreational facilities in the town, the proposed project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.

Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the 2040 GPU EIR. Thus, the proposed park project is consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

XVII. TRANSPORTATION. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	No	No	No
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No	No	No
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	No	No
d. Result in inadequate emergency access?	No	No	No

Discussion

a. The law has changed with respect to how transportation-related impacts may be addressed under CEQA. Traditionally, lead agencies used LOS to assess the significance of such impacts, with greater levels of congestion considered to be more significant than lesser levels. Mitigation measures typically took the form of capacity-increasing improvements, which often had their own environmental impacts (e.g., to biological resources). Depending on circumstances, and an agency's tolerance for congestion (e.g., as reflected in its general plan), LOS D, E, or F often represented significant environmental effects. In 2013, however, the Legislature passed legislation with the intention of ultimately doing away with LOS in most instances as a basis for environmental analysis under CEQA. Enacted as part of SB 743 (2013), PRC Section 21099, subdivision (b)(1), directed the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed CEQA Guidelines addressing "criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, [OPR] shall recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. The office may also establish criteria for models used to analyze transportation impacts to ensure the models are accurate, reliable, and consistent with the intent of this section."

CEQA Guidelines Section 21099(b)(2) further provides that "[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to [CEQA], except in locations specifically identified in the guidelines, if any."

Pursuant to SB 743, the Natural Resources Agency promulgated CEQA Guidelines Section 15064.3 in late 2018. It became effective in early 2019. Subdivision (a) of that section provides that "[g]enerally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel.

Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact."

Please refer to question 'b' for a discussion of VMT.

Pedestrian, Bicycle, and Transit Facilities

According to the 2040 GPU EIR, the development and growth associated with implementation of the GPU would increase the demand and use of bicycle, pedestrian, and transit facilities and increase vehicular traffic. However, the GPU includes goals, policies, and actions that would enhance and expand transit, bicycle, and pedestrian facilities to provide a more connected and efficient multimodal transportation network.

For example, the GPU includes policies that require new development to incorporate features that maximize transit access and use (Policy M-3.1) and promote collaboration with regional partners to expand the provision of inter-regional transit services to and from the Lake Tahoe Basin, ski areas, summer recreation destinations, and public lands (Policy M-3.11; Action M-8.B). In addition, GPU Policies M-T-2, M-T-3, and M-T-4 would improve and expand transit service within the Town.

Through implementation of GPU Policy M-2.1, the Town would maintain, implement, and update the Truckee Trails and Bikeways Master Plan, which would facilitate the expansion of the Town's interconnected system of bikeways, trails, and sidewalks. Additionally, GPU Policies M-2, M-PB-5, M-PB-1, M-PB-2, M-PB-3, M-P-1, M-B-1, M-B-2, M-B-3, M-B-4, and M-B-5 encourage and prioritize the development of a more connected, safe, and efficient bicycle and pedestrian network throughout the Town; thus, improving bicycle and pedestrian circulation infrastructure in the Town.

The implementation of the goals, policies, and actions in the GPU would result in a more integrated and complete network of bicycle and pedestrian facilities as compared to existing conditions. By reducing the number of bicycle and pedestrian network gaps alternative transportation users would be less likely to physically mix with higher speeds and volumes of vehicle traffic, reducing the potential for bicycle-vehicle conflicts. Additionally, the GPU would not conflict with a program, plan, ordinance, or policy addressing transit, bicycle, or pedestrian facilities. Therefore, the 2040 GPU EIR concluded that impacts would be less than significant.

The proposed project's potential impacts related to pedestrian, bicycle, and transit facilities are discussed below.

Pedestrian Facilities

Existing pedestrian facilities in the project vicinity include a Class I paved trail located off of Pioneer Trail to the east of the Pioneer Commerce Center and sidewalks along Pioneer Trail connecting to the pedestrian trail system along Truckee Way. As such, several trails in the project site vicinity could provide pedestrian access to the site.

As part of the previously installed infrastructure at the site, a concrete sidewalk was installed along the parcel frontage on Pioneer Trail. The new sidewalk would provide a pedestrian connection from Truckee Way to the new service commercial complex. Pedestrian pathways will also be constructed within the complex to connect the buildings.

Implementation of the proposed project would not conflict with any planned pedestrian facilities. Therefore, the proposed project would not result in the creation of a conflict with any adopted programs, plans, ordinances, or policies addressing pedestrian facilities. As such, the proposed project is not anticipated to result in new significant impacts or substantially more severe significant impacts to pedestrian facilities than what were previously analyzed in the 2040 GPU EIR.

Bicycle Facilities

Currently, the Town includes 22 miles of Class I paved trails, 31 miles of Class II bicycle lanes, and 42 miles of Class III bicycle routes. The Truckee Trails and Bikeway Master Plan would increase the network of bicycle lanes and bicycle routes by connecting to existing paved and dirt trails. Ultimately, the Truckee Trails and Bikeway Master Plan would result in the development of 67 miles of additional dirt trails, paved trails, bicycle lanes, and bicycle routes.

Existing Class II bicycle lanes are located along Pioneer Trail from the Comstock Drive Trail and the Trout Creek Trail out to Truckee Way. As previously discussed, the Class I Trout Creek Trail and a Class I paved trail along Comstock Drive are located within the project site vicinity. As part of the proposed project, bicycle parking will be required in proximity to the new buildings. The proposed project would not alter the existing circulation system and, thus, would not conflict with any existing or proposed bicycle facilities within the Town. Given that the proposed project is well served by bicycle facilities and would not conflict with a program, plan or ordinance addressing bicycle facilities, including the Truckee Trails and Bikeway Master Plan, the proposed project is not anticipated to result in new significant impacts or substantially more severe significant impacts to bicycle facilities than what were previously analyzed in the 2040 GPU EIR.

Transit Facilities

Placer County operates the TART, which provides transit service between Truckee and Tahoe City along the SR 89 corridor. The Town operates Truckee TART, which includes the TLR, operating within Truckee, and the Truckee TART Night Service, operating between Truckee and the Northstar and Palisades Tahoe Resorts. Service is provided seven days a week. The TLR runs along Truckee Way, and the closest stop (Truckee Way just northeast of the project site) is located approximately 0.04-mile northeast of the project site at the entrance to the Village Camp RV Park. Additionally, another transit stop is located at the entrance to the Truckee Donner Recreation and Park District's Recreation and Aquatic Center .

Truckee Dial-A-Ride also operates within the Town as a curb-to-curb demand response service to persons with disabilities with ADA certification and the general public. Truckee Dial-A-Ride service is provided between 6:30 AM and 6:30 PM daily. The Town is currently operating a microtransit service that provides door to door service free of charge between 6:30 AM and 10:00 PM during the fall and spring, and between 6:30 AM and 12:00 AM during the summer and winter.

As such, adequate transit facilities would be available to serve the future employees and visitors of the proposed project. Thus, the proposed project would not conflict with a program, plan, ordinance, or policy addressing transit service and the proposed project is not anticipated to result in new significant impacts or substantially more severe significant

impacts related to transit facilities than what were previously analyzed in the 2040 GPU EIR.

Conclusion

Based on the above, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As such, the project is not anticipated to result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b. Section 15064.3 of the CEQA Guidelines provides specific considerations for evaluating a project's transportation impacts. Pursuant to Section 15064.3, analysis of VMT attributable to a project is the most appropriate measure of transportation impacts. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Truckee adopted VMT thresholds of significance on April 19, 2022, pursuant to CEQA Guidelines 15064.7(b). Truckee's thresholds of significance are based upon OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which includes screening thresholds to identify when a lead agency may screen out VMT impacts. Consistent with OPR Guidance, projects that meet certain screening thresholds based on their location and project type may be presumed to result in a less-than-significant transportation impact.

According to the 2040 GPU EIR, over the planning horizon, vehicle trips and overall VMT would increase as a result of the town service population (residents, employees, and visitors) increase. However, because of the nature of buildout of the GPU which concentrates the proposed land use changes within approximately three percent of the Town's total land area and focuses on infill development, VMT per service population is estimated to be reduced by approximately 10 percent.

Additionally, the GPU includes policies that would expand transit, bicycle, pedestrian, and complete street networks, and implement transportation demand management strategies. For example, several policies promote trails and bikeways that could reduce automobile use, including Policies M-2.1, M-2.2, M-2.3. and M-4.1. In addition, through implementation of Action M-2.I, the Town would identify and implement new pedestrian and bicycle facilities beyond the existing facilities identified in the Trails and Bikeways Master Plan and Downtown Streetscape Plan. The GPU also includes policies intended to improve the functionality of existing services, such as first-last mile solutions that connect passengers between transportation modes (Policy M-3.4) and collaborating with regional partners to expand the provision of inter-regional transit services (Policy M-3.11). The Town would also work with local and regional organizations and agencies to continue existing transit operations and implement expanded transit services within and to the Town (Action M-3.H).

The aforementioned GPU policies would provide additional VMT reduction benefits not captured in the VMT modeling. However, the 2040 GPU EIR concluded that the effectiveness of the proposed VMT reducing polices and actions contained within the GPU are not known and subsequent vehicle trip reduction effects cannot be guaranteed. Therefore, due to uncertainties regarding the ability for the aforementioned policies and

actions to quantifiably reduce VMT impacts, the 2040 GPU EIR concluded that the impact to VMT would be significant and unavoidable.

Truckee's VMT Thresholds of Significance identify different project types that are assumed to cause a less-than-significant transportation impact and for which a detailed VMT study is not necessary. The residential portion of this project would meet this criteria due to being located within ½ mile of Brockway Road, Donner pass Road and/or the Truckee Way corridor as explained in the LSC Transportation Consultants Traffic Analysis prepared for this project and included as part of Appendix A.

As the non-residential uses are not screened, a full VMT analysis of the non-residential uses was conducted. First, the VMT generated by each land use is calculated. Then the thresholds of significance are determined and compared to the project-generated VMT. The project is located in TAZ 79, which has an average trip length of 13.2 miles. Multiplying this trip length by the project's daily vehicle trips generated for each land use provides the 'proposed project VMT' by use.

The Truckee Vehicle-Miles of Travel Standards (LSC, 2023) provides thresholds of significance for common land uses and the process for generating a threshold of significance for other land use not on the list. All land use thresholds of significance were taken from the list provided in the Truckee Vehicle-Miles of Travel Standards (LSC, 2023) except the General Manufacturing and Specialty Retail land uses. As these two land uses are not provided, a special analysis was conducted, resulting in a standard of significance for General Manufacturing of 57 VMT per unit and Specialty Retail of 440 VMT per unit. The threshold of significance per unit was multiplied by the proposed land use quantity to calculate the 'threshold of significance VMT' total. A direct comparison of each land use VMT to its respective threshold of significance VMT shows that that project does not meet all individual thresholds of significance. However, this project is a mixed-use project, so a cumulative trip generation rate can be developed to show that the total non-residential uses' VMT are less than the cumulative threshold of significance VMT. Therefore, the non-residential land uses are considered to have a less than significant impact on VMT.

Based on the above information, the project is not anticipated to result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

c,d. According to the 2040 GPU EIR, through implementation of the goals, policies, and actions of the GPU, existing conflicts between motor vehicles and non-motorized travelers would be reduced over time. According to the 2040 GPU EIR, the GPU includes policies that are intended to result in a reduction in potential conflicts between road use types. Implementation of GPU Policies M-2.3, M-2.5, M-2.6, and M-2.8 are intended to create a safe, comprehensive, and integrated system of trails, sidewalks, and bikeways. In addition, GPU Policy M-2.7 would enforce existing pedestrian and bicycle access standards for all new development and require developers to finance and install pedestrian walkways and multi-use trails in new development, as appropriate and necessary to address circulation needs. Through implementation of such policies, existing conflicts between motor vehicles and non-motorized travelers would be reduced over time.

Additionally, as discussed in the 2040 GPU EIR, the GPU includes circulation improvements and policies that would enhance emergency access throughout the Town

of Truckee. For example, GPU Policy M-4.11 encourages roadway connectivity, prohibits new gated roadways, and encourages the elimination of existing gated roadways, which would also enhance emergency access. Additionally, implementation of GPU Policies M-2.8 and M-4.12 would expand separate Class 1 paved non-auto facilities and would have a beneficial impact to emergency access by providing an alternative route for emergency response vehicles if public roadways are blocked.

Furthermore, all future development and associated emergency access under the GPU would be subject to review by the Town of Truckee and responsible emergency service agencies; thus, ensuring all future projects would be designed to meet all Town of Truckee emergency access, design, and safety standards. Therefore, the 2040 GPU EIR concluded that buildout of the GPU would not result in inadequate emergency access or substantially increase transportation-related hazards, and a less-than-significant impact would occur.

The proposed project does not include changes to existing roadways or the introduction of an incompatible use or any design features that would be considered hazardous. The primary vehicle access points to the project site would be provided by an existing 24-foot-wide driveway on the north side and two 12-foot lanes divided by a landscape median on the south side, which would allow vehicles to both enter and exit the project site from Pioneer Trail. The access points connect to a road which allows for internal circulation and connects to all parking areas within the subdivision.

Construction traffic associated with the proposed project would include heavy-duty vehicles associated with transport of construction material, as well as daily construction employee trips to and from the site that would share the area roadways with normal vehicle traffic, creating potential conflicts with other roadway users. However, due to the scale of the proposed project and associated improvements, construction traffic is not anticipated to severely affect traffic flows in the project area.

Based on the above information, the project is not anticipated to result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

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:	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
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).	No	No	No
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.	No	No	No

Discussion

a,b. As discussed in Section V, Cultural Resources, of this Modified Initial Study, all areas within the town are considered sensitive regarding the presence of cultural resources and areas in adjoining or outlying subdivisions are considered moderately to highly likely to contain cultural resources.

California law recognizes the need to protect tribal cultural resources from inadvertent destruction and the procedures for the treatment of tribal cultural resources are contained in PRC Section 21080.3.2 and Section 21084.3 (a). Nevertheless, the Town determined that avoidance of tribal cultural resources may not be possible in all cases and the possibility remains that excavation activities related to buildout of the GPU might not be able to avoid impacting significant tribal cultural resources. Because California Native American Tribes consider any disturbance of a tribal cultural resource to be a substantial adverse change, the 2040 GPU EIR determined that development of the GPU would result in a significant and unavoidable impact related to tribal cultural resources.

The project site has been previously evaluated for cultural resources and found not to be a sensitive site. Since the study was conducted the site has been substantially improved with paving, utilities and stormwater infrastructure. During ground disturbance, no indication of cultural resources were discovered on site.

The 2040 GPU EIR identifies measures consistent with State law, such as State Health and Safety Code requirements set forth in Section 7050.5 and PRC Section 21084.3(b), in the event that human remains are discovered during ground-disturbing activities. The GPU also includes policies which would reduce impacts to tribal cultural resources. For example, GPU Policy CC-4.1 requires assessment of discretionary development sites where ground disturbance would occur. Where there is evidence of tribal cultural resources or there is determined to be a high likelihood for the occurrence of such sites, GPU Policy CC-4.1 indicates that the Town will require monitoring by a qualified

professional. As related to tribal cultural resources, a "qualified professional" consists of the geographically and culturally affiliated tribe.

The previously prepared cultural resource study prepared for the site found that the project would not potentially cause a physical change that would affect unique ethnic (including Native American) cultural values or restrict historic or pre-historic religious or sacred uses. Furthermore, as discussed in Section V, Cultural Resources, of this Modified Initial Study, the proposed project would be required to comply with Section 18.30.040 of the Development Code, which provides procedures and standards for the treatment of archaeological resources and human remains.

Based on the above information, because the project would comply with the requirements of Section 18.30.040 of the Development Code, the project is not anticipated to result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

XIX. UTILITIES AND SERVICE SYSTEMS. *Would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	No	No	No
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	No	No	No
c. Result in a determination by the wastewater 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?	No	No	No
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?	No	No	No
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No	No	No

Discussion

a-c. According to the 2040 GPU EIR, new or expanded facilities would be consistent with the typical construction effects of development associated with the GPU and would be subject to GPU policies and actions intended to protect the environment. As such, buildout of the GPU would result in less-than-significant impacts related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities.

All water, wastewater, stormwater drainage, electrical, natural gas and telecommunication facilities to serve the site were previously installed as part of a previous project that expired and could not be completed. Brief discussions of these facilities are included below.

Water

As previously mentioned under Section X, Hydrology and Water Quality, of this Modified Initial Study, water for the project site would be supplied by the TDPUD. According to the District's 2020 UWMP, the anticipated maximum demand at buildout of the service area is approximately 4,344 mgy. With a total water supply of at least 22,000 mgy, water supply greatly exceeds the anticipated demand at buildout of the TDPUD service area. The water demand projections presented in the 2020 UWMP are based on continued operation of all existing developments as well as buildout of all vacant parcels.

The 2040 GPU EIR concluded that projected development under the GPU would result in an increase in water demand. However, as noted in the 2040 GPU EIR, the UWMP demonstrates ample supply during normal, dry, and multiple dry years; includes identification of infrastructure upgrades; and would continue to be updated every five years to address realized growth and demand. Overall, the development pattern encouraged by the GPU would preserve and enhance the Truckee River corridor and Donner Lake, while promoting improved watershed health and yield through regulated development and land uses. In addition, GPU Policies LU-5.1 and LU-5.2 would require the Town to work with all special districts, including TDPUD, to ensure coordination of development and provision of services within the Town. Furthermore, GPU Policies COS-7.7 and COS-7.8 encourage water purveyors to plan for long-term needs and support the efforts of local water agencies to identify, procure, and plan for long-term projected future water demand. Thus, the 2040 GPU EIR determined that implementation of the GPU is not anticipated to result in insufficient water supply or environmental effects due to the construction of new or expanded water infrastructure, and impacts would be less than significant.

Considering that the UWMP anticipated buildout of all existing development and currently undeveloped parcels within the town, and that the available water supply far exceeds anticipated demand, adequate water supply exists to serve the project without resulting in a significant decrease in the available water supplies such that the project may interfere with management of the MVGB. Given that the groundwater basin has adequate capacity to provide for over 36 years of water demand, the proposed project would not significantly impact the TDPUD's water supply. As such, the TDPUD would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Sewer Service

Sewer service would be provided to the site by the TSD and the Tahoe Truckee Sanitation Agency (TTSA) treatment plant has adequate capacity to treat all wastewater generated by the project. TSD services an area of approximately 38-square miles through the operation and maintenance of a wastewater collection system that includes over 300 miles of sewer pipelines. Collected sewage is conveyed to the TTSA Water Reclamation Plant (WRP), located adjacent to the Truckee River and Tahoe Truckee Airport. According to the 2040 GPU EIR, the TTSA previously upgraded and expanded wastewater facilities to increase handling capacity to 9.6 million gallons per day (MGD) and meet the projected demands up to the year 2025 from buildout of the GPU.

The 2040 GPU EIR determined that projected development under the GPU would result in an overall increase in the amount of wastewater generated in the town. However, while the population growth could result in greater wastewater generation, the TTSA WRP has available capacity to serve projected buildout demands. The existing wastewater treatment plant would adequately serve development throughout the planning horizon of the GPU, while supplemental policies would further reduce wastewater generation. Therefore, the 2040 GPU EIR concluded that impacts would be less than significant.

Given that the proposed project is consistent with the GPU land use designation for the site, the overall increase in wastewater generation would be generally consistent with what was planned for the project site in the GPU. Consequently, adequate sewer service capacity exists to serve the project.

Stormwater Systems

Issues related to stormwater infrastructure are discussed in Section X, Hydrology and Water Quality, of this Modified Initial Study. As noted therein, the proposed project would not significantly increase stormwater flows into the Town's existing system. Therefore, the proposed project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Other Utilities

Electric, natural gas, and telecommunications utilities would be provided by way of connections to existing infrastructure located within the immediate project vicinity. The proposed project included the installation of new gas service lines to serve the proposed new building sites. The overhead utility lines and power poles located within the northern portion of the site would remain. The proposed project would not require major upgrades to, or extension of, existing infrastructure. Thus, impacts to electricity, natural gas, and telecommunications infrastructure would be less than significant.

Conclusion

Based on the above, the project is not anticipated to result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR related to the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, as well as impacts related to sufficient water supplies being available to serve the project and reasonably foreseeable future development, and the availability of adequate capacity to serve the wastewater demand projected for the proposed project in addition to the Town's existing commitments. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

d,e. According to the 2040 GPU EIR, projected development under the GPU would result in an overall increase in the amount of solid waste generated in the town. However, existing landfills would adequately serve development throughout the planning horizon of the GPU, while supplemental policies would further reduce solid waste. Therefore, impacts associated with development of the GPU were determined to be less than significant.

Solid waste, recyclable materials, and compostable material collection within the Town is operated by the Tahoe Truckee Sierra Disposal. All solid waste is disposed and/or processed at the waste facility at the Eastern Regional Landfill Material Recovery Facility. The Eastern Regional Landfill Material Recovery Facility covers seven acres of land and currently handles 445 tons of waste per day, although the permit for the site allows up to 600 tons of waste per day to be managed at the facility. After the solid waste has been sorted, materials that cannot be recycled would be taken to Lockwood Regional Landfill, which is a municipal solid waste facility located in Storey County, Nevada. The capacity of the Landfill is 302.5 million cubic yards (CY) with a disposal area of 856.5 acres. The Lockwood Regional Landfill has a waste volume of approximately 32.8 million CY. Thus, the Lockwood Regional Landfill has sufficient capacity to accommodate the project's construction and operational solid waste.

Pursuant to the CALGreen Code, at least 65 percent diversion of construction waste is required for projects permitted after January 1, 2017. Thus, the proposed project would be subject to the requirements of the CALGreen Code and 65 percent of the waste associated with the construction of the proposed project would be diverted.

With respect to operational solid waste generation, the proposed project would not be expected to generate substantial amounts of solid waste due to the allowable uses within the Service Commercial zoning district and proposed uses for the project site. In addition, the proposed project would be required to comply with all applicable provisions of Section 18.30.150, Solid Waste/Recyclable Materials Storage, of the Development Code. Therefore, the proposed project would not 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 and would comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

Based on the above information, the project is not anticipated to result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

XX. WILDFIRE. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	No	No	No
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?	No	No	No
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?	No	No	No

XX. WILDFIRE. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
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?	No	No	No

Discussion

a. As discussed in Section IX, Hazards and Hazardous Materials, of this Modified Initial Study, the Town of Truckee Emergency Operations Plan addresses the Town's responsibilities in emergencies associated with natural disaster, human-caused emergencies and technological incidents. The Emergency Operations Plan provides a framework for coordination of response and recovery efforts within the Town in coordination with local, State, and federal agencies. According to the 2040 GPU EIR, development of the GPU would increase the intensity of development in some areas of the town and accommodate more growth. Such growth could generate conflicts with existing adopted emergency response and evacuation plans by increasing traffic volume and decreasing the ratio of emergency response resources to residents. However, the GPU contains specific goals and policies related to emergency response and evacuation planning to minimize any conflict with such existing plans, and expressly calls for updating the plans to be compatible with growth. For example, GPU Goal SN-6, Emergency Response and Disaster Recovery would expand community preparedness and resilience to support effective response to emergencies. In addition, specific policies and actions that would be implemented under the GPU to achieve goal SN-6 include GPU Policies SN 6.1 through SN-6.9 and Actions SN-6.A through SN-6.H.

As discussed in the 2040 GPU EIR, construction associated with implementation of the GPU would not likely hinder emergency response activities or physically interfere with established evacuation routes. Although construction activities associated with development of the GPU could temporarily impair roadways used for emergency response and evacuation, standard construction procedures for development of a construction management plan would address these conditions and would develop alternative routes. As such, the 2040 GPU EIR concluded that buildout of the GPU would not substantially impair an adopted emergency response plan or emergency evacuation plan in or near State Responsibility Areas or lands classified as VHFHSZ, and impacts would be less than significant.

During construction of the proposed project, all construction equipment would be staged on-site so as to prevent obstruction of local and regional travel routes in the town that could be used as evacuation routes during emergency events. With respect to project operations, the proposed project would not alter the existing circulation system in the surrounding area. In addition, the proposed project would generate relatively few vehicle trips; therefore, the potential for the proposed project to impede surrounding residents from evacuating in the event of a wildfire is limited. For example, businesses within the Pioneer Commerce Center, located west of the project site, could use more than one road to exit the area in the event of a wildfire. As a result, the project would not have a significant impact with respect to impairing an adopted emergency response plan or emergency evacuation plan.

Based on the above information, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project would remain consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

b-d. As discussed in the 2040 GPU EIR, implementation of the GPU would allow for growth within an area at risk for wildfires and existing steep slopes and prevailing winds, increasing the risk of exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. While implementation of existing federal, State and local regulations, as well as GPU policies and actions would reduce impacts associated with exacerbated wildfire risks, thus, the 2040 GPU EIR concluded that impacts would remain significant and unavoidable.

According to the CAL FIRE Map of Fire Hazard Severity Zones in Local Responsibility Areas, the project site is located within a VHFHSZ. The proposed project would be required to comply with all applicable requirements of the California Fire Code and Chapter 7A of the CBC through the installation of automatic fire alarm systems, fire hydrants, and other applicable requirements. The proposed project would also be situated near existing roads and other utilities, that would help reduce risks related to wildfire. In addition, the project site is surrounded by existing development, which would further reduce risks related to wildfire, due to the existing development generally acting as a fuel break because of a lack of natural debris such as brush and green waste within developed sites.

Based on the above information, the project is not anticipated to result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2040 GPU EIR. As a result, the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
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?	No	No	No
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)?	No	No	No

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	No	No	No

Discussion

a. As discussed in Section IV, Biological Resources, of this Modified Initial Study, with implementation of GPU polices and the recommended pre-construction surveys will ensure, the proposed project would not adversely impact special-status plant or wildlife species. In addition, because the project site does not contain any known historic or prehistoric resources, implementation of the proposed project is not anticipated to have the potential to result in impacts related to historic or prehistoric resources. As conditions of approval, the proposed project would be required to comply with applicable GPU policies, as well as all applicable State regulations, related to preservation of archaeological resources and human remains if such resources are discovered within the project site during construction activities, consistent with the requirements of CEQA.

Considering the above, the proposed project would not: 1) degrade the quality of the environment; 2) substantially reduce or impact the habitat of fish or wildlife species; 3) cause fish or wildlife populations to drop below self-sustaining levels; 4) threaten to eliminate a plant or animal community; 5) reduce the number or restrict the range of a rare or endangered plant or animal; or 6) eliminate important examples of the major periods of California history or prehistory. Impacts associated with such resources have been adequately addressed and would not change from what was identified in the 2040 GPU EIR, and the criteria for requiring further CEQA review are not met.

b. The proposed project, in conjunction with other development within Truckee, could incrementally contribute to cumulative impacts in the area. However, the proposed project was included in the future development assumptions evaluated in the 2040 GPU EIR. The 2040 GPU EIR concluded that all cumulative impacts related to air quality, biological resources, cultural resources, GHG emissions, noise, transportation, tribal cultural resources, and wildfire would be significant and unavoidable. All other cumulative impacts were determined to be less-than-significant or less-than-significant with implementation of mitigation measures. Given that the proposed project is consistent with the Town's 2040 GPU land use designation for the project site, cumulative impacts associated with buildout of the site have been anticipated by the Town and were analyzed in the 2040 GPU EIR.

Additionally, the proposed project does not include cumulative impacts that were not analyzed or discussed in the previous EIR. As such, this Modified Initial Study does not include any substantial new information that shows impacts are more severe than previously discussed, and further analysis is not required. Therefore, the proposed project would be consistent with the conclusions of the 2040 GPU EIR, and is within the scope of activities evaluated in the 2040 GPU EIR.

c. As described in this Modified Initial Study, the proposed project would comply with all applicable GPU policies, Municipal and Development Code standards (except as modified through the requested Planned Development), and other applicable local, County, and State regulations. In addition, as discussed in the Air Quality, Geology and Soils, Hazards

and Hazardous Materials, and Noise sections of this Modified Initial Study, the proposed project would not cause substantial effects to human beings, including effects related to exposure to air pollutants, geologic hazards, hazardous materials, and excessive noise, beyond the effects previously analyzed as part of the 2040 GPU EIR. Therefore, further CEQA review is not required and the proposed project is within the scope of activities evaluated in the 2040 GPU EIR.

APPENDIX A

LSC TRAFFIC CONSULTANTS TRAFFIC ANALYSIS

APPENDIX B

SAXELBY ACOUSTICS ENVIRONMENTAL NOISE ASSESSMENT

APPENDIX C

RCH GROUP AIR QUALITY AND GREENHOUSE GAS EMISSIONS TECHNICAL REPORT