

Town Council

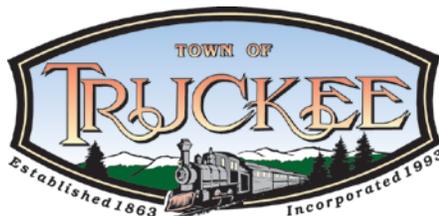
Alicia Barr, Mayor

Joan deRyk Jones, Vice Mayor

Carolyn Wallace Dee, Council Member

Patrick Flora, Council Member

Morgan Goodwin, Council Member



Department Heads

Tony Lashbrook, Town Manager

Andy Morris, Town Attorney

Adam McGill, Chief of Police

John McLaughlin, Community Development Director

Kim Szczurek, Administrative Services Director

Judy Price, Town Clerk

Alex Terrazas, Assistant Town Manager

Daniel Wilkins, Public Works Director/Town Engineer

July 15, 2015

Ms. Maywan Krach  
Environmental Coordination Services  
Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

RE: Town of Truckee Comments on Village at Squaw Valley Specific Plan Draft EIR

Dear Ms. Krach;

Thank you for the opportunity to comment on the Draft EIR for the proposed Squaw Valley Specific Plan. At a recent Town Council meeting, Town staff presented an overview of the Specific Plan and its associated environmental impacts. While the scale of the Specific Plan is large, it is located several miles south of the Town of Truckee so our comments and concerns focus on issues and impacts of regional concern or on potential impacts within the Town of Truckee that may result from the proposed project. Accordingly, the Council has the following comments for inclusion in the Final EIR.

**(1) Transportation and Circulation**

Several concerns were voiced during the Council's discussion over impacts to roadways located in and adjacent to the Town of Truckee. The following is a summary of these concerns:

Impacts to Caltrans Highways

The Draft EIR concludes that the proposed project would exacerbate already unacceptable operations on Segments of SR 89 between Deerfield Drive and West River Street and that this is a significant impact. Mitigation Measure 9-5 notes that the segment of SR 89 between Deerfield Drive and West River Street is conceptualized as a four-lane conventional highway (i.e. it would be widened from two to four lanes). However, the Draft EIR notes that such a widening project is not currently included in any adopted planning documents or fee programs. The Draft EIR thereby concludes that because there are no available mechanisms to provide an acceptable level of service within that segment, impacts would be significant and unavoidable.

While the impacted roadway is a Caltrans facility, impacts will result within the Town of Truckee and the increased Average Daily Trips (ADT) will impact the town's circulation patterns during the critical summer PM peak time period. The Town recognizes that even with mitigation, impacts may remain significant and unavoidable; however the Town encourages Placer County and KSL to take additional steps to require ways to reduce and minimize the traffic impacts associated with buildout of the Specific Plan. Specifically, the Town believes there are a range of mitigation measures available which would further reduce the impacts associated with increased traffic volumes on SR 89. Below are several suggestions for the County's consideration:

- Include specific mitigation measures to reduce both existing (i.e. baseline) and new ADT associated with the project. Efforts to reduce existing ADT will lessen the impacts associated with new ADT for this roadway section subject to significant impacts.
- Include specific mitigation measure to provide enhanced transit services beyond those identified as part of a fair-share contribution by the applicant. These methods could include more frequent headways, extended hours of operations and/or expanded route options beyond those associated with the expected increase in transit demand. These methods would be directed at reducing trips generated by both visitors and employees who stay or reside outside of Olympic Valley. Options include enhanced shuttle service from lodging facilities for visitors, and enhanced transit opportunities for employees. In other words, a greater contribution would be made beyond what is required as part of Mitigation Measure 9-7 and would facilitate reduced impacts to the overall ADT, especially related to this roadway segment.
- Include a specific mitigation measure to require Transportation Demand Management (TDM) options for both existing and new employees. This could include a shuttle service, rideshare program, employee programs which incentivize alternative transportation methods or other similar types of programs aimed at reducing ADT associated with resort employees.

These measures appear to be reasonable and within the ability of Placer County and KSL to accomplish and as such should be incorporated as mitigation measures.

Additionally, under Section 18-21 – Cumulative Impacts to Caltrans Intersections, several additional intersections within the Truckee town limits are identified, including SR89/Donner Pass Road and two ramps at I-80/SR89, which are projected to have significant and unavoidable impacts. The methodology used to make this determination appears different than that used by the Town of Truckee in our traffic modelling efforts. SR89/Donner Pass Road is included within the Town's traffic impact fee program, contrary to the statement on page 18-24 of the DEIR. The Town has serious concerns with these determinations and disagrees that "there is no timely mechanism available to achieve an acceptable LOS" at this intersection and requests that prior to any formal adoption of the specific plan that Placer County contact the Town of Truckee regarding these intersections. Should this impact be determined to be significant, options for effective mitigation of these significant impacts may be available, including specific infrastructure improvements.

The Town spent in excess of \$3 million in local funds to construct the roundabout improvements at I-80/SR89 to create adequate capacity that would limit negative impacts to the Town roadway network. The Town requests the opportunity to meet with Placer County and Caltrans regarding these specific intersections and the significant impacts identified.

Overall, it is the Town's position that greater efforts can be made to mitigate the significant impacts associated with the additional traffic generated. Mitigation can include infrastructure improvements to the SR89 corridor from Deerfield Drive to West River Street, including adding lanes at the Mousehole, or participating with an equitable financial contribution to this regional improvement. Similarly, infrastructure improvements can be made to the SR89/Donner Pass Road intersection, including the installation of a roundabout, to mitigate the significant impact.

Additional reductions in traffic may also be realized by the development of greater amounts of employee housing in Olympic Valley.

The Town also recognizes that traffic through these areas determined to have a significant impact could also be lessened through a reduction in the scale of the projects identified in the Specific Plan. It is appropriate to consider reduced development alternatives which would result in lower traffic impacts.

#### Impacts to Transit

As discussed in the Draft EIR, the Specific Plan describes several planned transit service expansions, some of which are listed as policies in the Specific Plan. However, the policies and service expansions do not explicitly require that the applicant ensure that an adequate supply of public transit service be available to meet the anticipated demand and therefore, impacts are significant. Mitigation Measure 9-7 requires a fair-share contribution or formation of a CSA or CFD to pay for the costs of increased transit demand.

As noted above under the Transportation and Circulation discussion, the Town believes it is appropriate to require the developer to provide enhanced transit services beyond those identified in the Draft EIR mitigation measure. Recognizing the current limited usage of transit by both resort employees and guests, improving and enhancing transit services could have significant implications for both traffic and circulation impacts. Increased transit service could provide mitigation for the significant and unavoidable impacts identified for transportation and circulation in the region.

#### Construction Impacts

The Draft EIR concludes that project construction would generate employee and truck trips which would use segments of SR 89. These activities could cause lane closures, damage to roadways, and increased conflicts with bicyclists and pedestrians and would lead to significant impacts. Mitigation Measure 9-8 requires implementation of a construction traffic management plan which will reduce impacts to less than significant levels. If future construction plans are expected to rely on import or export of materials to or from the Teichert aggregate mine located in Truckee, the Town requests the County amend Mitigation Measure 9-8 to include Town of Truckee roadways in the construction traffic management plan. Further, the

plan should require consultation with Town staff regarding construction traffic impacts and additional mitigation measures necessary to ensure impacts are minimized.

## **(2) Workforce housing**

As discussed in the Draft EIR, the project is anticipated to generate an additional 574 new full-time employees annually and up to 751 new peak winter employees. The Draft EIR notes that the East Parcel project is expected to accommodate 27% of the new employees and that the remainder of employees (73%) are expected to reside elsewhere within or outside of Olympic Valley. Similar to the Town's comments under Transportation and Circulation, the Town encourages the County to require ways of minimizing the impacts of both existing and new employees. Several suggestions are provided above which are intended to reduce the ADT associated with those employees who currently reside in Truckee or will reside in Truckee in the future.

Specific housing strategies should be developed as part of the Specific Plan to address meeting the requirement to provide housing to a minimum of half of new FTE's generated by the project operation. The greater the number of employees accommodated within Olympic Valley, the greater reduction in traffic impacts to the region. Additionally, the housing options should provide for a broader range of housing types (additional 1- and 2-bedroom apartments to supplement the proposed dormitory and studio units) to meet a wider range of housing needs for employees.

The Town recognizes that the employee housing strategy is tied closely to transportation impacts due to employee vehicle trips for those not housed in Olympic Valley. While Placer County's policy is to provide housing for 50% of new FTE, in attempts to address the greater traffic impacts, it would be beneficial to provide housing based on the total number of employees (full and part-time) rather than limited to an FTE calculation.

The Town is also concerned that deferring the employee/workforce housing plan to a future date with a combination of options that may not include on-site employee housing will create an unknown impact outside of the specific plan area that cannot be analyzed. The use of in-lieu fees for unidentified future projects, or other unidentified off-site housing options may end up impacting roadways and intersections beyond the analysis provided in the DEIR. The workforce housing plan must be developed and analyzed concurrent with the specific plan.

Any employee housing required as part of the implementation of the Specific Plan should be developed concurrently with each phase of the development. The employee housing should not be deferred to later phases of the project. The Town of Truckee raised similar employee housing concerns during the EIR process for the Village at Squaw Valley USA in 1999 (comment letter attached). It does not appear that any employee housing was developed in Olympic Valley as part of that project, and it is unclear whether any in-lieu fees were collected and utilized for mitigation of the housing impacts. The Town continues to be concerned with this project, and reiterates that a clear and implementable workforce housing plan must be developed and analyzed concurrent with the specific plan.

### (3) Long-Term Water Supplies

During this time of drought, the Town of Truckee is concerned regarding the long-term availability of adequate water supplies within Olympic Valley to support the range of development envisioned within the specific plan. The Town encourages the County to carefully examine the information provided regarding water availability, and to consider the regional impacts should additional water supplies be required.

Squaw Valley Public Services District has stated a desire to acquire a backup water source for Olympic Valley, identifying the Martis Valley aquifer as a potential source. The build out of the Squaw Valley Specific Plan will likely increase the need for this backup source. Town of Truckee citizens, through the Truckee Donner Public Utility District, receive their water from the Martis Valley aquifer. Additional demand placed on this aquifer could have regional water impacts, and should be studied as part of the review of the specific plan.

The Town of Truckee sincerely appreciates the ability to review and comment on this important project as part of the environmental review process. We are committed to working closely with the County and the project team to clarify and address our concerns and will make key staff available to do so. Should you have any questions or need clarification related to any of our concerns, please contact Town Manager Tony Lashbrook at 530.582.2901 or [tlashbrook@townoftruckee.com](mailto:tlashbrook@townoftruckee.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Alicia Barr".

Alicia Barr  
Mayor  
Town of Truckee

Attachment: June 10, 1999 letter regarding Draft EIR for Village at Squaw Valley USA

Town Council

Josh Susman, Mayor

Maia Schneider  
Ronald J. Florian  
Don McCormack  
Robert W. Drake



Stephen L. Wright, Town Manager  
J. Dennis Crabb, Town Attorney  
Thomas E. Covey, Public Works  
Daniel P. Wilkins, Town Engineer  
Tony Lashbrook, Community Development  
Jill R. Olsen, Administrative Services

PLACER COUNTY  
DATE  
RECEIVED

JUN 14 1999

June 10, 1999

Bill Combs, Senior Planner  
Placer County Planning Department  
11414 "B" Avenue  
Auburn, CA 95603

PLANNING DEPARTMENT

RE: Comments on Draft EIR for Village at Squaw Valley USA

Dear Mr. Combs,

The Town of Truckee appreciates this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley USA project. Conceptually, the Town is encouraged that the proposal may benefit the Resort Triangle. However, it is critical to the region that significant environmental impacts be fully disclosed and adequately mitigated. The Town's review and comments on the DEIR are focused on two areas that may result in significant impacts on the Town of Truckee and the region – housing and traffic. These are the same issues raised by the Town last year during the Notice of Preparation process for the DEIR. Please review and consider the following comments.

1. Housing

A. **General Comments** – The Town concurs with the general conclusions of the Draft EIR on housing: the project will create a substantial demand for new housing for employees and this impact will be significant and unavoidable until sufficient employee housing is constructed to meet this demand. Beyond the general conclusions, however, the Town has serious concerns regarding the DEIR's lack of information to properly analyze the project's housing impact including:

- use of a qualitative threshold of significant rather than a quantitative threshold,
- the mitigation measures proposed by the DEIR do not ensure that employee housing will be constructed that mitigate significant housing impacts,
- failure to address other alternatives and mitigation measures that would result in the construction of the necessary housing.

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By failing to address these issues, the DEIR fails to adequately address the project's housing impact on the Tahoe-Truckee region or more specifically on the Town of Truckee. Further, the Town does not concur with the EIR's approach in mitigating the project's housing impacts by relying on other private developers and the Placer County Housing Authority to provide the project's employee housing in areas away from Squaw Valley. We are concerned that the project will result in a substantial number of the project's employees residing in Truckee without Placer County exploring the alternatives of requiring employee housing as part of the project or, at the very least, requiring the project proponent to construct employee housing in suitable areas in the region. The Town is willing to discuss the need to construct some of the project's employee housing in Truckee, however, we cannot discuss and cooperate effectively with Placer County on these regional housing issues unless there is full disclosure in the EIR regarding the project's housing impacts. More specific comments follow.

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**B. Housing Information** – The DEIR lacks even the most basic information on the project's employee housing needs to allow a proper assessment of the project's housing demand and evaluation of its environmental impacts associated with housing. The project description for housing on Page 4.10-8 states that the project will add 450 jobs to the Squaw Valley area, most of the additional employees would be required to seek housing accommodations in other neighboring areas, and the project may increase the demand for affordable housing in the region. These general statements frame the problem adequately, but the DEIR fails to provide answers in response to these statements that are necessary to truly understand the extent of the project's impact on housing. At a minimum, *the Town requests that the following information be included in the DEIR:*

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1. *The number of housing units necessary to provide housing for the 450 employees (i.e. the housing demand for the project).*
2. *The distribution of the employee's housing demand, i.e. how many employees will be able to find housing in Squaw Valley and how many employees will be required to seek housing in the North Lake Tahoe area, Truckee area, and other areas with estimates provided for each of these areas.*
3. *The number of affordable housing units necessary to provide housing for the 450 employees and the definition of "affordable" used by the DEIR.*
4. *A discussion of the current availability of vacant housing units that would be affordable to typical employees of the project.*

**C. Threshold of Significance and Impact Analysis** – Thresholds of significance are identified in the DEIR for housing to indicate if the project will have a significant effect. Unfortunately, these thresholds are qualitative and do not provide a quantitative standard to review significance, although Placer County General Plan Policy 2.A.18 presents a defined, quantifiable threshold of significance to evaluate the project's housing impacts. It states that the project must provide for employee housing equal to 50% of the housing demand generated by the project. This threshold, if used, would provide clear guidance

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on whether the project will have significant housing impacts. If the project provides less than 50% of the required housing, the jobs-housing balance and housing demand impacts will be significant; if the projects provides 50% or more of the required housing, these impacts will be less than significant. Because a quantitative threshold of significance provides a better guideline for determining significance and the Placer County General Plan provides a clear threshold for determining housing impacts, *the Town requests that the EIR use Placer County General Plan Policy 2.A.18 as a threshold of significance for housing.* With the information listed in Paragraph 1.B above, the impact analysis for housing will provide clear and concise information allowing the readers of the EIR, and ultimately the decision-makers, to understand the project's housing impacts and their significance.

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The Truckee General Plan projects that approximately 40 very low- to low-income affordable housing units will need to be constructed in Truckee annually to meet our affordable housing needs. These projections were based on the assumption that affordable housing would need to be provided for service workers in ski and summer resort and other businesses in the Donner Summit area, Truckee, and Martis Valley. It was assumed that employee housing for resorts in North Lake Tahoe, Alpine Meadows, and Squaw Valley would be provided in those respective areas. *The EIR should estimate the number of housing units that would be constructed in Truckee under the proposed mitigation.* This number will vary if other mitigation measures are adopted to address housing impacts. In addition, *the EIR should address the secondary impacts that will arise upon implementation of the mitigation measure.* If the EIR foresees that housing will be needed in the Truckee region to serve the project's employees, the Town has identified several secondary impacts including impacts on the availability of affordable housing in the Town of Truckee, the Town's efforts to provide affordable housing for our projected housing demand, and on providing general services such as health and other human services, recreation, law enforcement, schools, and other general government services. *The Town requests that the EIR analyze the potential environmental effects including secondary impacts that may occur if the project will result in a demand for housing in Truckee by its employees.*

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**D. Mitigation Measure** – The recommended mitigation measure does not describe how the mitigation measure will produce the required number of employee housing units. Consequently, it is not possible to estimate or ultimately measure the effectiveness of the mitigation measure and whether or not it mitigates the jobs-housing imbalance to a less-than-significant level. In fact, it is impossible to determine if the project is even consistent with the Placer County General Plan. Our concern with the current mitigation measures include:

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- The amount of the fee is not specified (it is presumed that the fee would be determined after project approval by staff with little or no guidelines to provide staff with an understanding of the objective of the mitigation measure),
- the relationship between the fee and the dollars necessary to facilitate construction of employee housing is not specified,

- The EIR contains no analysis of the availability of sufficient sites in the North Lake Tahoe-Truckee region to accommodate the project's housing needs without adversely affecting the region's current housing shortfalls and needs,
- The EIR does not specify how much employee housing will actually be constructed as a result of this mitigation measure.

Comments 1.B and 1.C address the need to have a quantifiable threshold of significance in order to properly assess and mitigate the housing impacts to a less-than-significant level. The mitigation measure falls well short of providing a nexus between the mitigation measure and the intended result of the mitigation measure (the construction of employee housing) and showing how the mitigation measure will reduce the housing impacts to a less-than-significant level. In fact, the mitigation measure defers action in providing employee housing with an established time limit and relieves the project proponent of responsibility upon payment of an unknown housing fee without establishing a specific goal or target that must be met by the project proponent to provide employee housing. This places most of the burden on public housing agencies, non-profit housing organizations, and private developers to construct the project proponent's employee housing. There is no discussion or evidence on how the mitigation measure will result in the construction of employee housing for the project nor how it will reduce the project's housing impacts to a less than significant level.

*The Town requests that the following comments be addressed and incorporated into the EIR to alleviate these substantial shortcomings:*

1. *The in-lieu housing fee must be quantified with a timing schedule of when the fee must be paid. The EIR must discuss how this in-lieu housing fee, acting as a subsidy, low-interest loan, or other financial assistance mechanism, will serve as a catalyst in the construction of new housing and whether the in-lieu fee is of the proper amount that will result in the construction of the required number of housing units.*
2. *An analysis of how long it will take before the required housing is constructed. This is important in order to understand the length of time that the short-term significant and unavoidable housing impacts will occur (1 year, 5 years, 10 years?).*
3. *Potential housing sites and their feasibility for future housing must be identified and discussed in order to determine whether there are sufficient sites in the region to accommodate the required housing. This information and the information described in Paragraph 1.D.1 are necessary to fully understand whether the mitigation measure will directly result in the construction of new housing or whether other factors including a housing fee that is too low will preclude the mitigation measure from being successfully implemented to provide housing for the project's employees. This discussion must be tied into an analysis of whether affordable housing for the project's employees will hinder the efforts*

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*of Placer County and Truckee to meet their existing and future affordable housing needs.*

4. *The mitigation measure should have quantified performance criteria – how much housing must be constructed with the housing fees to meet the project's employee housing needs. The mitigation measure should have a time limit by which the required number of housing units must be constructed with a contingency mitigation measure that will be automatically triggered if these performance criteria are not met. The contingency measure would need to directly result in the construction of housing units to meet the project's employee housing needs.*

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**E. Other Mitigation** – The Town believes that the formulation of precise means of mitigating the jobs-housing imbalance or housing demand impacts is feasible and practical at this time. The DEIR should identify other mitigation measures that could substantially lessen the housing impacts and discuss why it is thought that these mitigation measures are not feasible or practical. The mitigation measures could be implemented as a group so that the housing impacts are addressed in several different ways. *The Town requests that the following mitigation measures be identified and discussed in the EIR:*

1. *Setting aside a certain number of the project's housing units for employees, either short-term (until employee housing is constructed elsewhere) or long-term.*
2. *Constructing employee housing as part of the project.*
3. *Finding suitable sites in Squaw Valley and constructing or assisting in the construction of employee housing. As in Truckee, this could even include facilitating second units on existing single-family residential areas.*
4. *Finding suitable sites in the North Lake Tahoe-Truckee region and constructing or assisting in the construction of employee housing or adding new housing to the existing housing stock.*

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*If it is ultimately decided not to implement these mitigation measures or other possible mitigation measures, it should be discussed in the EIR why these mitigation measures are not being required (i.e. why the mitigation measures are not feasible).*

## **2. Traffic**

In general, the traffic analysis appears to be technically adequate in terms of identifying appropriate trip generation rates and the magnitude of the potential impacts to the local circulation system. The focus of the Town's comments on traffic are the proposed mitigation measures and the adequacy of those measures to mitigate all potentially significant impacts of the project. The following presents a discussion of proposed mitigation measures related to traffic flow to, from and within the Truckee Town limits, and the adequacy of those measures to fully mitigate all impacts.

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Mitigation Measures 4.7-1 and 4.7-2

While these projects are currently in the Town of Truckee CIP, funding sources and designation of a lead agency for the intersection reconstruction projects have not yet been secured. Because traffic from the proposed project will create a significant impact at these two intersections, it would be appropriate to condition the project applicant to construct the intersection improvements prior to issuance of a building permit for the project. Additionally, the Town of Truckee has a General Plan policy that requires alternatives to signalization be considered when appropriate. Given the significant available right-of-way at these intersections and favorable grades, any intersection improvement alternatives should consider modern roundabout construction as an option to signalization.

Because the details of how the fair share funding allocations were determined are not presented, the Town has no basis to determine whether or not these percentages are appropriate. Additional detail should be provided as to how the fair share funding percentages were determined for this mitigation with the opportunity for the Town of Truckee to provide further comment as to the adequacy of the methodology. Because this project is currently in the conceptual stages, fully engineered plans, specifications, and detailed cost estimates are currently not available. Therefore, a mechanism should be developed whereby the project applicant would pay its fair share of all project-related costs including, but not limited to, design, engineering, permitting, construction management, and actual construction costs. This mechanism would be easily implemented if the intersection improvements are conditioned on building permit issuance. All engineering and/or design of these projects should be done in close consultation with the Town of Truckee, Caltrans, Placer County, Nevada County Transportation Commission, and the project proponent's staff through the formation of a project design team.

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Mitigation Measure 4.7-3

The Town of Truckee has a General Plan policy that requires alternatives to signalization be considered when appropriate. Given the significant available right-of-way at this intersection and favorable grades, any intersection improvement alternative should consider modern roundabout construction as an option to signalization.

Because the details of how the fair share funding allocation was determined are not presented, the Town has no basis to determine whether or not this percentage is appropriate. Additional detail should be provided as to how the fair share funding percentage was determined for this project with the opportunity for the Town of Truckee to provide further comment as to the adequacy of the methodology. All engineering and/or design of this project should be done in close consultation with the Town of Truckee, Caltrans, Placer County, Nevada County Transportation Commission, and the project proponent's staff through the formation of a project design team.

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Mitigation Measure 4.7-8

In order to mitigate impacts to the State Route 89 corridor between Squaw Valley and Truckee, the project applicant should be required to implement a coning program which establishes a peak

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direction HOV lane during peak demand periods. This would provide preference to transit vehicles and carpools with 4+ occupants during periods of congestion on State Route 89. This mitigation would not require widening of SR 89, but would provide an HOV lane during periods of congestion that occur on holiday and peak weekends.

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Mitigation Measure 4.7-13

The Town of Truckee, the Nevada County Transportation Commission, and the Placer County Transportation Commission are currently exploring funding sources for capacity enhancements at the Mousehole. Initial studies performed on the Mousehole have identified both two- and four-lane road and bridge construction alternatives that would significantly improve pedestrian and vehicle safety and flow on this section of State Route 89. The State Route 89/Union Pacific Railroad Grade Separation Feasibility Analysis Report considered a range of options to improve pedestrian and traffic circulation in this area. Conclusions of this report identify that it may be possible to accommodate future traffic loads with an improved two-lane cross section, which would require an additional or replacement structure to the existing Mousehole.

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The report is clear that the existing structure is deficient in accommodating existing and future traffic demand. The conclusion that the addition of traffic to the Mousehole creates significant impacts is accurate. The conclusion that these impacts are unmitigatable, however, is inaccurate. Impacts of this project to the traffic flow at the Mousehole could be mitigated through a fair share funding contribution to the improvement of the Mousehole. The Nevada County Transportation Commission is currently planning a corridor study along State Route 89 from Donner Pass Road to West River Street. This study will consider feasibility of roundabout construction at key intersections along this corridor and determine the ultimate preferred cross section and potential constraints and funding sources for the Mousehole reconstruction. Participation of this project in funding for the Mousehole improvement would mitigate the projects impacts to a less than significant level.

Mitigation Measure 4.7-16

It is not clear how the fair share allocation of 11 percent of transit route costs was identified. Because the details of how the fair share funding allocation was determined are not presented, the Town has no basis to determine whether or not this percentage is appropriate. Additional detail should be provided as to how the fair share funding percentage was determined for this project with the opportunity for the Town of Truckee to provide further comment as to the adequacy of the methodology.

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It is also unclear as to whether the fair share funding allocation would be applied to all existing Truckee to Tahoe City Routes or only the proposed two additional routes. Additional detail of how the need for the additional two routes were determined to mitigate transit impacts should also be provided with the opportunity for further review by the Town of Truckee.

Other Comments

It is noted that the project applicant will be required to pay the appropriate Placer County traffic impact fees for this project. Given the fact that 60 to 70 percent of project generated traffic is

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forecast to have origins and destinations within or through the Town of Truckee along the State Route 89 corridor, it would be appropriate to earmark a portion of those funds to the capital improvement projects identified along the State Route 89 corridor (SR 89/I-80 interchange, Mousehole, West River Street/SR 89 improvement). It would be appropriate to tie a fair share portion of those mitigation fees to the above reference projects as a part of the mitigations identified in the project EIR.

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The Town also requests that the EIR be recirculated for review and comment if the traffic generation methodology or conclusions are modified through the final EIR process.

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I hope these comments are of assistance in the preparation of the Final Environmental Impact Report. If you have any questions regarding these comments, please feel free to contact Tony Lashbrook at (530) 582-7876.

Sincerely,

  
Joshua L. Susman, Mayor

Cc Placer County Board of Supervisors.  
Nevada County Board of Supervisors  
Nevada County Planning Department  
Sierra Sun