

2 RESPONSES TO COMMENTS ON THE DRAFT EIR

2.1 INTRODUCTION

This Final EIR contains the comment letters received on the Draft EIR, including summarized oral comments received during the August 30, 2012 public hearing, and individual responses to substantive environmental issues raised in those comments. The 45-day public review period began on July 27, 2012 and ended on September 10, 2012.

2.2 FORMAT OF COMMENTS AND RESPONSES

Comment letters and responses to comments are arranged in the following order:

- ▲ State Agencies
- ▲ Local Agencies
- ▲ Service Providers
- ▲ Organizations
- ▲ Individuals
- ▲ Public Hearing

Each letter and each comment within a letter have been given an identification number. Responses correspond with letter and comment numbers, and are cross-referenced where appropriate to avoid redundancy.

2.3 LIST OF COMMENTERS

Table 2-1 lists all parties that submitted written comments on the Draft EIR. Individuals that provided oral comments at the public hearing are listed in the public hearing summary notes.

Table 2-1 List of Commenters		
Letter #	Agency / Commenter	Date of Comment
State Agencies		
1	California Department of Forestry and Fire Protection (CALFIRE), Matthew Reischman	September 11, 2012
2	California Department of Parks and Recreation, Tamara Sasaki	September 10, 2012
3	California Department of Water Resources, Eric Hong	August 13, 2012
4	California State Clearinghouse and Planning Unit, Scott Morgan	September 11, 2012
Local Agencies		
5	Northern Sierra Air Quality Management District, Gretchen Bennitt	September 7, 2012
6	Placer County Flood Control and Water Conservation District, Andrew Darrow	August 30, 2012
7	Sierra County Department of Planning and Building Inspection, Tim H. Beals	September 6, 2012
8	Town of Truckee, Joan deRyk Jones	September 6, 2012
Service Providers		
9	Tahoe-Truckee Sanitation Agency, Marcia A. Beals	August 27, 2012

Table 2-1 List of Commenters		
Letter #	Agency / Commenter	Date of Comment
Organizations		
10	Center for Biological Diversity, Kevin P. Bundy	September 10, 2012
11	Sierra Business Council, Anne Grogan	August 30, 2012
Individuals/Businesses		
12	Jesse Boeri, Boeri Design Architecture and Planning	August 31, 2012
13	Jim Brennan, J.C. Brennan & Associates	September 10, 2012
14	Steve Kerby	September 2, 2012
15	Larry Lawrence, Lawrence Realty	September 2, 2012
16	Eric Perlman	July 30, 2012
17	Steven Shearer, Butler Manufacturing	August 21, 2012
18	Michal Theroux, Teru Talk	August 11, 2012
19	Scott Wesley, MP Biomass	September 4, 2012
20	Matt Woodward, Industrial Contractors	August 21, 2012
Public Hearing (PH)		
PH1	Public Hearing	August 30, 2012

2.4 COMMENTS AND RESPONSES ON THE DRAFT EIR

The written and oral comments on the Draft EIR and the responses to those comments are provided in this section in accordance with State CEQA Guidelines Section 15088. Pursuant to State CEQA Guidelines Section 15088(c) the response describes the disposition of significant environmental issues raised. Where a commenter has provided multiple comments, each comment is indicated by brackets and an identifying number notation in the margin of the comment letter. During the public review period, 20 letters that identified environmental issues or questions, or offered support for the project, were submitted to Placer County. In addition to these letters, two commenters from the public provided oral comments at the hearing on August 30, 2012.

2.4.1 STATE AGENCIES

1

STATE OF CALIFORNIA—THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor



DEPARTMENT OF FORESTRY AND FIRE PROTECTION

13760 Lincoln Way
AUBURN, CA 95603
(530) 889-0111
Website: www.fire.ca.gov



September 11, 2012

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SEP 12 2012

ENVIRONMENTAL COORDINATION SERVICES

Gerry Haas
Placer County Comm. Dev. Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: cabin Creek Biomass Facility Project (SCG#2011122032)

The above project has been reviewed for compliance with the California Forest Practice Act and Rules. Pertinent requirements of the rules are summarized in the bullets list below, with rule references and explanation provided here:

The project could involve the cutting or removal or both of timber or other solid wood forest products from timberlands for commercial purposes. Additionally, Public Resources Code 4527 defines commercial purposes, among other activities, as the cutting or removal of trees during the conversion of timberlands to land uses other than the growing of timber including residential or commercial development projects. Any such projects implemented under the revised plan are subject to the Forest Practice Act and Rules.

Recommendations for compliance with the Forest Practice Act and Rules are as follows:

- o Submittal of a Timber Harvest Plan (RM-63) or other harvesting document for timberland acreage included in the project.
- o Submittal of a timberland conversion permit or applicable timberland conversion exemption.
- o Incorporation of a California Licensed Timber Operator for conduct of timber operations.

The Forest Practice Rules and harvesting forms are available online at:

http://www.fire.ca.gov/php/rsrc-mgt_forestpractice.php

Sincerely,

Matthew Reischman
Unit Forester
Nevada-Yuba-Placer Unit
(530) 265-2603

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SEP 12 2012

cc Ken Nehoda, CAL FIRE-Sacramento CA
State Clearinghouse-Sacramento CA

1-1

CONSERVATION IS WISE-KEEP CALIFORNIA GREEN AND GOLDEN

PLEASE REMEMBER TO CONSERVE ENERGY. FOR TIPS AND INFORMATION, VISIT "FLEX YOUR POWER" AT WWW.CA.GOV.

**Letter 1
Response****California Department of Forestry and Fire Protection
Matthew Reischman, Unit Forester
September 11, 2012**

1-1

The commenter states that the project could involve the cutting or removal or both of timber or other solid wood forest products from timberlands for commercial purposes. Activities defined as commercial purposes under Public Resources Code (PRC) Section 4527 include the cutting or removal of trees during the conversion of timberlands to land uses other than the growing of timber, including residential and commercial development projects. These activities are subject to the Forest Practice Act and Rules, which require submittal of a Timber Harvest Plan, submittal of a timberland conversion permit and require that a California licensed Timber Operator oversee the conduct of timber operations.

As stated on page 3-11 of the Draft EIR, the fuel supply for the proposed project would be solely woody biomass, derived from a variety of sources including forest-sourced material (hazardous fuels residuals [i.e., woody biomass material that poses a substantial fire threat to human or environmental health], forest thinning and harvest residuals [i.e., woody biomass generated from forest maintenance and restoration activities], and clean wildland urban interface [WUI]-sourced waste materials from residential and commercial property defensible space clearing activities). (The project description has been revised to clarify that clean urban wood waste and any treated wood would not be used, and to eliminate reference to pine needles as a fuel source [see Chapter 3 of this Final EIR].)

While the fuel supply used in the proposed facility would be derived from the sources as described above, the applicant or the County would not be the entity responsible for timber removal activities. These activities would occur independent of the project. Project activities do not include the cutting or removal of timber or other wood products from the forest. The project would not harvest forest residuals and would not otherwise cause specific timber harvest or fuel reduction projects to occur; rather, the proposed project would use residual forest biomass from independent projects that would be required to be in compliance with existing laws and regulations. These independent projects, which could generate forest residuals for use as biomass, would occur regardless if the proposed project is in operation. Therefore, a timber harvest plan or timberland conversion permit would not be required for the delivery of forest biomass to the biomass facility.

Forest management projects on federal lands are generally conducted in accordance with forest management plans prepared pursuant to the National Forest Management Act of 1976 (NFMA), and site-specific environmental analyses prepared under the National Environmental Policy Act (NEPA). Timber harvest and timberland conversion projects would be required to comply with CEQA and the Forest Practice Act and Rules on a case-by-case basis, as they are proposed. As described above, projects that result in timberland conversion and timber harvest operations would occur regardless of whether or not the proposed biomass facility was constructed and placed in operation. The entities responsible for these conversion and harvest operations would be responsible for complying with appropriate federal and State regulations.

With regard to tree removal at the project site, the Draft EIR (pages 5-18 and 5-19) describes that approximately 1.87 acres of Jeffrey pine forest on the project site would be cleared and graded in preparation for construction of proposed project facilities. This tree removal and conversion of the site to a non-timber use must comply with the Forest Practice Act and Rules.

In this case, because the extent of tree removal is less than 3 acres, the applicant may file a Timberland Conversion Exemption to filing a Timber Harvest Plan (Section 1104.1 of the 2012 Forest Practice Rules). The applicant will need to have a Notice of Conversion Exemption prepared by a registered professional forester for submittal to the California Department of Forestry and Fire Protection. The text on page 3-24 of the Draft EIR is revised as follows to reflect the exemption; these changes are also reflected in Chapter 3 of this Final EIR. These revisions do not constitute new significant information or alter conclusions regarding environmental impacts contained in the Draft EIR.

- ▲ Fire Protection Agency Pre-Approval (Truckee Fire Protection District)
- ▲ ~~Timberland Conversion Permit~~ Notice of Conversion Exemption to filing a Timber Harvest Plan (California Department of Forestry and Fire Protection)

2



State of California • Natural Resources Agency

Edmund G. Brown Jr., Governor

DEPARTMENT OF PARKS AND RECREATION

Janelle R. Beland, Acting Director

Sierra District
P.O. Box 266
Tahoma, CA 96142
530/525-7232

September 10, 2012

Placer County
Community Development Resource Agency
Maywan Krach, Community Development Technician
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Subject: Cabin Creek Biomass Facility Project, SCH# 2011122032

Dear Ms. Krach,

The California Department of Parks and Recreation (CA State Parks) appreciates the opportunity to comment on the Cabin Creek Biomass Facility Project proposed by Placer County. CA State Parks has five park units in Placer County (portion of Donner Memorial State Park [SP], Ward Creek Unit; Burton Creek SP, Tahoe State Recreation Area [SRA], and Kings Beach SRA) and nine total park units within the Lake Tahoe Basin. We have an active forestry program that includes forest thinning and fuels reduction. Where feasible, CA State Parks forestry projects tries to chip smaller trees and slash and has the chips hauled to biomass facilities for utilization. Placer County has helped to support CA State Parks in the transport of our chips to appropriate biomass facilities, sometimes as far as Woodland, CA. CA State Parks would like to see a biomass facility within a reasonable distance from our park units.

2-1

I just recently found out that the former Sierra Pacific Industries (SPI) biomass facility in Loyalton is preparing to be operational in about a month. SPI will transfer ownership of the facility in January 2013 to Plumas Rural Services. I verified this with Michelle Fuller, Executive Director of Plumas Rural Services. Since Loyalton biomass plant is within the 30 mile radius of the proposed Cabin Creek Biomass Plant, the EIR should analyze if the region can support two biomass facilities over time.

2-2

If you have any questions or need additional information, please contact me.

Sincerely,

Tamara Sasaki
Sr. Environmental Scientist

**Letter 2
Response**

**California Department of Parks and Recreation
Tamara Sasaki, Senior Environmental Scientist
September 10, 2012**

- 2-1 The commenter notes that the California Department of Parks and Recreation (CA State Parks) has five park units in Placer County and a total of nine parks in the Lake Tahoe Basin. CA State Parks tries to chip smaller trees and slash and have the chips hauled to a biomass facility. CA State Parks would like to see a biomass facility within a reasonable distance from their parks.
- The commenter's support for the construction of a biomass facility near state park facilities is noted.
- 2-2 The commenter notes that the Loyalton biomass plant will be operational in about a month; the commenter states that the EIR should analyze whether the region can support two biomass facilities over time.
- With regard to the future operation of the Loyalton biomass plant, Placer County staff (Brett Storey) contacted Jim Turner, Sierra Pacific Industries (SPI) Plant Manager, in early September 2012 to determine the status of repowering the plant at Loyalton. Staff at the SPI facility in Loyalton have secured grant funding to support future operations at the site. As discussed with Placer County staff, staff at Loyalton are currently negotiating a power purchase agreement and it is expected that the plant could be operational by summer 2013 at the earliest.
- As described in Section 3.4.3 of the Draft EIR, the current biomass material markets in the region include a demand of approximately 40,350 bone dry tones (BDT) per year. This figure includes fuel demand from a number of existing facilities including the currently idle SPI facility at Loyalton. The material that the Cabin Creek Biomass Facility would use is not likely to be used by Loyalton because of the cost of removal of the material from the forest and the distance to Loyalton. Historically, the facility at Loyalton has not taken forest-sourced material from in-field locations in the area, which is why it is currently burned in piles. The Master Stewardship Agreement (MSA) that Placer County has in place with the USFS would remove biomass material that would otherwise be piled and burned. It is unlikely that it would be economically feasible for the Loyalton plant to take that material in the future, unless they too negotiated a similar MSA, but the distance would likely be too great. Regardless, the County's fuel supply study states that there is an estimated 112,440 BDT per year available and the proposed project would not exceed 17,000 BDT per year. More than 50 percent of the fuel within the core fuel supply area (CFSA) would be available at such time that Loyalton were to be repowered. As such, there would be adequate fuel supplies to support operation of both plants.

STATE OF CALIFORNIA - CALIFORNIA NATURAL RESOURCES AGENCY

EDMUND G. BROWN JR., Gov

3

DEPARTMENT OF WATER RESOURCES

NORTH CENTRAL REGION OFFICE
3500 INDUSTRIAL BOULEVARD
WEST SACRAMENTO, CA 95691



AUG 13 2012

Ms. Maywan Krach
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, California 95603

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AUG 17 2012

ENVIRONMENTAL COORDINATION SERVICES

Re: Draft Environmental Impact Report
Cabin Creek Biomass Facility Project
SCH No. 2011122032

Dear Ms. Krach:

The Department of Water Resources' North Central Region Office (NCRO) has received Placer County's "Notice of Availability of a Draft EIR for Public Review" for the above referenced project and appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR). NCRO had provided comments on the Notice of Preparation for the project in a February 29, 2012 letter, copy attached. Our comments requested that the environmental documents for the above project reference the Truckee River Operating Agreement (TROA). NCRO has reviewed the DEIR and cannot find reference to TROA in the document.

The DEIR states in Section 3.4.6 on page 3-19 the preferred alternative, gasification, does not result in consumptive water use, but does use well water which is then disposed to the sewer. Under TROA's terms the use of well water disposed of to the sewer is charged against California's allocation contained within TROA. The quantity of water thus disposed is estimated by the DEIR to amount to 12.9 acre-feet per annum assuming an 80% duty rating for the plant. Since the water required by the plant will be charged to the California allocation under TROA, if and when it goes into effect, our comment to the DEIR is that TROA and the effect of the plant's water use on California's allocation should be mentioned in the document.

3-1

If you have any questions, please contact John Headlee, of my staff, at (916) 376-9636.

Eric Hong, Chief,
North Central Region Office

Enclosures

cc: Dean Crippen, Chief
Groundwater Supply Assessment & Special Studies Section

James Mizell, Staff Counsel
DWR Office of Chief Counsel

*J. Headlee**CABIN CREEK BIOMASS**FEB 29 2012*

Ms. Maywan Krach
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, California 95603

Re: Cabin Creek Biomass Facility Project
SCH No. 2011122032

Dear Ms. Krach:

Thank you for the opportunity to comment on the Notice of Preparation, dated December 9, 2011, for the above referenced project. The California Department of Water Resources (DWR) represented California in negotiations leading up to the signing of the Truckee River Operating Agreement (TROA). TROA contains an interstate allocation of water between California and Nevada. DWR believes it is important to keep potentially affected parties informed of TROA and the interstate allocation during planning activities such as yours, since they may become effective concurrently.

In view of the fact that the Notice of Preparation refers on page 10 to a use of water of up to 7200 gallons per day for 330 days per year, we recommend that you review the terms of the Public Law 101-618 (1990) and TROA for applicability to the subject project. TROA was executed by the United States and the states of California and Nevada, among others, on September 6, 2008. Public Law 101-618 includes an interstate allocation of surface and ground water in the Lake Tahoe and Truckee Basins which would go into effect when TROA goes into effect. A precondition to TROA going into effect is the resolution of recently initiated federal litigation. This pending interstate allocation and any applicable provisions of TROA should be referenced in environmental documents for projects that include new wells or diversions of water in the Lake Tahoe and Truckee Basins. More information concerning TROA and Public Law 101-618 can be obtained by referencing our web site at www.cd.water.ca.gov/cnwa/troa.cfm. The text of TROA can be found at http://www.usbr.gov/mp/troa/final/troa_final_09-08_full.pdf.

If you have any questions, please contact John Headlee of my staff at (916) 376-9636.

ORIGINAL SIGNED BY

Eric Hong, Chief,
North Central Region Office

cc: Mr. Dean Crippen, Chief
Groundwater Supply Assessment & Special Studies Section

Ms. Linda Ackley, Staff Counsel
DWR Office of Chief Counsel

**Letter 3
Response****California Department of Water Resources,
Eric Hong, Chief, North Central Region Office
August 13, 2012**

3-1

The commenter states that the Draft EIR does not reference the Truckee River Operating Agreement (TROA) as was requested in the Agency's Notice of Preparation comments. The commenter further states, that because the project would use well water, which is then disposed of to the sewer, under the TROA's terms the water used is charged against California's allocation contained with the TROA. The commenter states that the effect of the biomass plant's water use on California's allocation should be mentioned in the environmental document.

Section 15.2.1 and Impact 15-1 of the Draft EIR have been revised to include a description of TROA and a discussion of the proposed project's effects on California's TROA allocation, if and when it goes into effect. These revisions do not constitute new significant information or alter conclusions regarding environmental impacts contained in the Draft EIR.

In response to this comment, the text of Section 15.2.1, page 15-4, is revised as follows: (Note: these changes are also incorporated into Chapter 3, Revisions and Corrections to the Draft EIR, of this Final EIR.)

15.2.1 FEDERAL

~~There are no federal plans or policies addressing public services and utilities that pertain to the project.~~

TRUCKEE RIVER OPERATING AGREEMENT

The Truckee River Operating Agreement (TROA), signed on September 6, 2008, was developed to formalize, regulate, and monitor water rights and water use within the Tahoe Region, the Truckee River Watershed, and the final outflow areas of Pyramid Lake and the Carson River. TROA was signed by: the U.S. Department of the Interior; the U.S. Department of Justice; the states of California and Nevada; the cities of Fernley, Sparks, and Reno; the Pyramid Lake Paiute Tribe; Washoe County; Sierra Pacific Power Company, and seven public utility and/or water districts. This agreement, which represents the culmination of 18 years of negotiation, was designed to establish minimum storage volumes for and improve the operational flexibility of the Truckee River reservoirs. Under TROA, the interstate allocation caps total groundwater pumping in California at 32,000 acre-feet per year in the Truckee River Basin, less whatever surface water is diverted (surface water is currently limited to 10,000 acre-feet per year) (U.S. Bureau of Reclamation and Department of Water Resources 2008: p. 3-130). Implementation of TROA will involve hydrologic and water accounting data and tracking. While TROA has been signed, it is not yet in effect. Several actions, including court approvals in California and Nevada and approval of water rights change petitions, must be completed before TROA can be implemented.

Also, in response to this comment, the text of the Impact 15-1, on page 15-7 of the Draft EIR, is revised as follows; these same changes are made to Impact 15-1 on page 2-26 of the Draft EIR:

Impact 15-1 **Water Supply Impacts.** Water supply on the site is limited to the capacity of the existing well and pump. The Applicant would select a vendor whose gasification technology could conform to water supply capabilities of the well and water supply system serving the site. Additionally, the project includes construction of a second well to provide redundant supply and reliability in the remote event the existing well would fail. The new well would be required to meet water quality and quantity criteria of the Placer County Environmental Health Department. Water used for plant operation would also be charged against California's water allocation under TROA, if and when it goes into effect. The additional water consumed by the plant would not be at a level that would cause California's TROA allocation to be exceeded. Because adequate well capacity and redundant water supply would be provided with implementation of the project, the project's water supply impacts would be **less than significant**.

Finally, in response to this comment, the following has been added to the discussion under Impact 15-1, page 15-8:

In order to install a second well for the water supply system, the Domestic Water Supply Permit for the existing water system would require amendment. The permit amendment requires the following steps: 1) obtaining a well construction permit; 2) testing the new well to make a determination that the new well can provide adequate quantity and quality; and 3) applying for an amendment to the Water Supply Permit (Ramsey, pers. com. 2012).

The quantity of water used and treated would also be charged against the California allocation for the Truckee River Basin under TROA, when and if it goes into effect. In California, as of 2008 groundwater use in the Truckee River Basin was 10,370 acre-feet per year (of which 2,800 acre-feet was surface water use) (U.S. Bureau of Reclamation and Department of Water Resources 2008). Under TROA, the interstate allocation caps the total groundwater pumping volume in the Truckee River Basin for California at 32,000 acre-feet per year, less whatever surface water is diverted. Water consumption on an annual basis for the proposed project has not been calculated. Peak demand estimates described above are included for informational purposes and to determine the adequacy of the well and pump to accommodate the proposed project. Depending on vendor selection, average water use would be well below the projected peak use. Therefore, it is difficult to predict the annual water usage of the proposed biomass facility at the site and the project's effect on California's TROA allocation for the Truckee River Basin, if and when it goes into effect. For comparative purposes, even under an unrealistic scenario whereby the plant were to operate at a continuous peak level (up to 14,400 gpd for 365 days of the year, which is equivalent to 15.8 acre-feet per year), the proposed project would add incrementally (0.05 percent of the total allocation, and 0.07 percent of the remaining allocation as of 2008) to groundwater pumping against the TROA allocation, but would not cause the allocation cap to be exceeded.

These revisions do not constitute new significant information or alter conclusions regarding environmental impacts contained in the Draft EIR.

4



EDMUND G. BROWN, JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEH ALEE
DIRECTOR

September 11, 2012

Gerry Haas
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

Subject: Cabin Creek Biomass Facility Project
SCH#: 2011122032

Dear Gerry Haas:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 10, 2012, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

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ENVIRONMENTAL COORDINATION SERVICES

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SEP 12 2012

PLACER COUNTY

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 325-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2011122032
Project Title Cabin Creek Biomass Facility Project
Lead Agency Placer County

Type EIR Draft EIR
Description Placer County is proposing to construct a two-megawatt wood-to-energy biomass facility that would use gasification technology at the Eastern Regional Materials Recovery Facility (MRF) and Landfill. The project site is located on 3.7-acre site in the southernmost area of the property. The proposed project would include construction of an approximately 11,000 sf, two-story structure to house the power generating and emissions control equipment, an approximately one-acre material storage area including a 7,000 sf open air pole barn structure, and additional onsite improvements to support operations at the facility. Biomass materials (fuel) would be processed (ground and screened) at locations from which they are removed (e.g. USFS fuels reduction sites) and delivered via haul truck to the proposed project site.

Lead Agency Contact

Name Gerry Haas
Agency Placer County Community Development Resource Agency
Phone 530 745 3084 **Fax**
email
Address 3091 County Center Drive, Suite 190
City Auburn **State** CA **Zip** 95603

Project Location

County Placer
City Truckee
Region
Lat / Long
Cross Streets SR 89/Cabin Creek Road
Parcel No. 080-070-016
Township 17N **Range** 16E **Section** 28 **Base** MDD&M

Proximity to:

Highways SR 89
Airports
Railways
Waterways Truckee River
Schools
Land Use Placer County General Plan: Agricultural/Timberland - 80 Acre Minimum; Zoning: forestry-special purpose (FOR-SP)

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 2; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 3 N; Regional Water Quality Control Bd., Region 6 (So Lake Tahoe); Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission; Public Utilities Commission

Date Received 07/27/2012 **Start of Review** 07/27/2012 **End of Review** 09/10/2012

**Letter 4
Response**

**California State Clearinghouse and Planning Unit
Scott Morgan, Director
September 11, 2012**

- 4-1 This comment includes a transmittal letter from the State Clearinghouse office to state agencies for review of the Draft EIR. The comment does not raise any issues regarding the environmental analysis in the Draft EIR. Consistent with the requirements of CEQA, no further response is required.

2.4.2 LOCAL AGENCIES

5

NORTHERN SIERRA AIR QUALITY MANAGEMENT DISTRICT Gretchen Bennett, Executive Director

DISTRICT HEADQUARTERS
200 Linton Drive, Suite 320
P.O. Box 2509
Orono Valley, CA 95945
(530) 274-8390 / FAX (530) 274-7546
email: office@nsaqmdistrict.com or www.nsqamdistrict.com

EMERGENCY FIELD OFFICE
13450 Donner Pass Rd., Ste. B, Truckee, CA 96161
Mailing Address: P.O. Box 9766, Truckee, CA 96162
(530) 550-7872 / FAX (530) 587-2625
email: ryan@nsaqmdistrict.com

NORTHERN FIELD OFFICE
270 County Hospital Road, Suite 127
P.O. Box 3981, Quincy, CA 95971
(530) 283-4654 / FAX (530) 283-6699

September 7, 2012

Maywan Krach
Placer County Community Development Resource Agency,
Environmental Coordination Services
3091 County Center Drive, Suite 190,
Auburn, CA 9560

Re: Cabin Creek Biomass Facility Project Draft EIR

Dear Ms. Krach:

The Northern Sierra Air Quality Management District (NSAQMD) has reviewed the Draft EIR for the proposed Cabin Creek Biomass Facility Project and would like to submit the following comments.

Historically, the NSAQMD has supported efforts to convert excess woody biomass into energy and anticipates (based on emissions information in the DEIR) that direct air quality impacts from the project site to the jurisdiction of the NSAQMD are likely to be less than significant. However, the NSAQMD recommends the following information regarding air quality be addressed in the DEIR in the interest of informing the public and decision-makers.

Potential for Air Quality Impact on Truckee

The proposed project site is located 1.67 miles from the Nevada County/Town of Truckee limits (NSAQMD jurisdiction); 2.8 miles from downtown Truckee; and 2.9 miles from the NSAQMD's particulate matter air monitors in downtown Truckee.

The EIR should address pollutant behavior under extreme winter-time inversions and the possibility that emissions could be channeled down the Truckee River canyon. Open burning of wood waste adjacent to the proposed site has historically impacted Truckee under inversion conditions.

Truckee has historically had high levels of particulate matter and only through a very pro-active program (and tremendous sacrifices by the Truckee population), has the area managed to avoid becoming classified as a federal nonattainment area. This has been especially challenging due to extreme wintertime inversions in the area.

Note that the Truckee Fire Station hosts two NSAQMD PM2.5 Federal Reference Monitors (one that samples for 24 hours every three days and one that samples for 24 hours every 6 days) and one continuously operated Beta Attenuation Monitor (BAM) that yields hourly values. The Particulate Matter values from the BAM can be accessed via the Air Resources Board's website: <http://www.arb.ca.gov/aqmis2/aqselect.php>.

5-1
5-2
5-3

Greenwaste Disposal

Currently, the ERM Recovery Facility receives greenwaste generated in the vicinity of Truckee, which has traditionally been forwarded to other biomass-fired power plants to be used for power production, with stringent air pollution controls. This has resulted in the diversion of many tons of greenwaste from open-burn piles (with avoided emissions of air pollutants). Under the proposed new use for the site, will residents still be allowed to drop off greenwaste? It is the NSAQMD's understanding that the fuel proposed for the plant is not to include residential greenwaste.

5-4

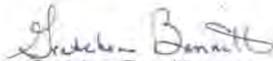
Federal Air Quality Attainment Status

The DEIR states on page 9-3 that the MCAB is "classified as non-attainment for ozone," which is incorrect. The air basin as a whole has not received a federal classification – only specific portions. Eastern Nevada County (including Truckee) is not non-attainment for ozone.

5-5

Thank you for your consideration of these comments.

Sincerely,



Gretchen Bennitt,
Executive Director
Northern Sierra Air Quality Management District

GB/si

**Letter 5
Response**

**Northern Sierra Air Quality Management District
Gretchen Bennitt, Executive Director
September 7, 2012**

- 5-1 The commenter includes prefatory remarks and provides an introductory statement that the Northern Sierra Air Quality Management District (NSAQMD) has reviewed the Draft EIR and is generally supportive of efforts to convert excess woody biomass into energy. NSAQMD recommends that additional information regarding air quality be addressed in the Draft EIR in the interest of informing the public and decision-makers. The request for specific additional information and questions raised by NSAQMD are addressed in the responses below.
- 5-2 The commenter states that the project site is located 1.67 miles from the Town of Truckee and the EIR should address pollutant behavior under extreme winter time inversions and the possibility that emissions could be channeled down the Truckee River canyon. The commenter also states that Truckee has historically experienced high levels of particulate matter.
- Many air districts in California, including the Placer County Air Pollution Control District (PCAPCD) and NSAQMD, establish mass emission thresholds for particulate emissions to determine whether emissions of PM₁₀ and PM_{2.5} from individual projects would violate applicable, concentration-based air quality standards or contribute substantially to an existing or projected air quality violation. As explained on pages 9-7 and 9-9 of the Draft EIR, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) were established for criteria air pollutants, including PM₁₀ and PM_{2.5}, to protect the public health and public welfare. The NAAQS and CAAQS are standards for every day of the year, including days when a winter-time inversion may be present, as well as other types of worst-case meteorological conditions. Thus, it is understood that the PCAPCD mass emission threshold of 82 lb/day takes into account worst-case meteorological conditions that could occur throughout the seasons of the year. (In addition, as stated on page 9-9 of the Draft EIR, the CAAQS incorporate a margin of safety to protect sensitive individuals.) PCAPCD does not recommend different mass emission thresholds for different seasons of the year, or for specific meteorological conditions such as a wintertime inversions. Also, PCAPCD recommends one set of mass emission thresholds to be used for all types of projects, rather than having different thresholds for different projects.
- Emissions of particulate matter associated with project construction, including PM₁₀ and PM_{2.5}, were analyzed under Impact 3.9-1. Short-term construction-related emissions of PM₁₀ and PM_{2.5} were estimated using the California Emissions Estimator Model (CalEEMod) Version 2011.1.1 computer program (SCAQMD 2011), as recommended by both NSAQMD and PCAPCD. A detailed description of model input and output parameters, and assumptions, is provided in Appendix D of the Draft EIR. As shown in Table 9-6, the maximum daily emissions of PM₁₀ generated by project construction would be approximately 8 pounds per day (lb/day). This is less than both PCAPCD threshold of 82 lb/day and NSAQMD Level A threshold of 24 lb/day. The maximum daily emissions of PM_{2.5} generated by project construction would be approximately 5 lb/day. Because construction-generated PM₁₀ emissions would be less than the applicable threshold of 82 lb/day, and because PM_{2.5} is a subset of PM₁₀, it is not anticipated that construction activity would result in concentrations of PM_{2.5} that would violate or substantially contribute to a violation of the ambient air quality standards for PM_{2.5}. Therefore, no mitigation is required.

Operational emissions of PM₁₀ and PM_{2.5} were analyzed under Impact 3.9-2. As shown in Table 9-7, this analysis estimated that maximum daily operation emissions of PM₁₀ and PM_{2.5} would be 29.5 lb/day and 17.5 lb/day, respectively. These levels are also less than PCAPCD's recommended thresholds of significance and the Level A thresholds recommended by NSAQMD and therefore, no mitigation is required.

The commenter also states, "open burning of wood waste adjacent to the proposed site has historically impacted Truckee under inversion conditions." The impact conclusion under Impact 3.9-2 is conservative in that it did not account for the fact that operation of the project would result in less open burning in the region, though open burning of forest-sourced biomass is a substantial source of PM₁₀ and PM_{2.5}. However, estimated levels of avoided emissions of PM₁₀ and PM_{2.5} associated with the open burning of forest-sourced biomass are provided in Table 9-8 on page 9-21. As shown in Table 9-8, approximately 167 tons of PM₁₀, and 142 tons of PM_{2.5} would be avoided annually.

Moreover, the proposed biomass plant would be subject to the permitting requirements of PCAPCD.

- 5-3 The commenter states that the Town of Truckee has historically experienced high levels of particulate matter and that ambient levels of PM_{2.5} are monitored by NSAQMD at the Truckee Fire Station. On page 9-3, the Draft EIR recognizes that "the Truckee Fire Station, located approximately three miles to the north, is the closest monitoring station to the project site with recent data for ozone and PM_{2.5}" and monitoring data for PM_{2.5} from the Truckee Fire Station is summarized in Table 9-2 on page 9-4. Note #1 at the bottom of Table 9-2 explains that the PM_{2.5} data presented in the table is from the Truckee Fire Station. This comment does not specifically raise any issues with the environmental analysis provided in the Draft EIR; therefore, no further response can be provided.
- 5-4 The commenter notes that the Eastern Regional MRF and Transfer Station receives greenwaste generated in the Truckee area, which has resulted in many tons of diversion and as such is an important non-disposal option for the town. The greenwaste hauled to the facility has then been taken to other biomass facilities with stringent air pollution controls to be used for power production. The commenter asks if residents will still be allowed to drop off greenwaste at the Eastern Regional MRF and Transfer Station facility.
- The fuel supply characteristics for the proposed plant are described in Section 3.4.3 of the Draft EIR. Operations at the Eastern Regional MRF and Transfer Station would not be altered by the operations at the proposed biomass facility. Therefore, residents would continue to drop off greenwaste at the Eastern Regional MRF and Transfer Station site, consistent with current practices. Residents, however, would not be able to drop off materials at the proposed biomass facility, which would be a separate operation from the MRF and Transfer Station.
- 5-5 The commenter remarks about a statement on page 9-3 of the Draft EIR, which states "...the MCAB is classified as non-attainment for ozone as a result of ozone levels measured at other monitoring stations throughout the MCAB." The commenter explains that the MCAB as a whole has not received a federal classification and that only specific portions of the MCAB, including eastern Nevada County, are classified as nonattainment. The commenter is correct. The text on page 9-3 of the Draft EIR is revised as follows. These revisions do not constitute new significant

information or alter conclusions regarding environmental impacts contained in the Draft EIR.
(Note: these changes are also reflected in Chapter 3 of this Final EIR.)

Note that although the Truckee monitoring station indicates that the local Truckee area is in attainment for ozone, the western portion of Nevada County, including Truckee, is classified as non-attainment for ozone according to the ARB (ARB 2011; ARB no date). ~~the MCAB is classified as non-attainment for ozone as a result of ozone levels measured at other monitoring stations throughout the MCAB.~~



PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

6

Ken Grehm, Executive Director
Brian Keating, District Engineer
Andrew Darrow, Development Coordinator

August 30, 2012

Maywan Krach
Placer County
Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

RE: Cabin Creek Biomass Facility / PCPJ 20110376, Draft EIR

Maywan:

We have reviewed the Draft EIR dated July 27, 2012 for the subject project and have the following comments.

- 1. Per the Draft EIR, the applicant is proposing to construct a 120' x 30' onsite stormwater detention basin to mitigate for the subject project's increases in peak flow runoff. The District requests that this project be conditioned to mitigate peak flow rates to pre-development levels for 10- and 100-year storm events per the Placer County Stormwater Management Manual.
- 2. Have the applicant check and confirm the 10- and 100-year pre-project peak flow rates listed on Page 13-13 of the Draft EIR. Also, adjust the post-project peak flow rate increases if necessary.

6-1
6-2
6-3

The District requests that the applicant provide a copy of the preliminary drainage report, as well as any future environmental documents, for our review and comment. Please call me at (530) 745-7541 if you have any questions regarding these comments.

Andrew Darrow, P.E., CFM
Development Coordinator

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3091 County Center Drive, Suite 220 / Auburn, CA 95603 / Tel: (530) 745-7541 / Fax: (530) 745-3531

**Letter 6
Response****Placer County Flood Control and Water Conservation District
Andrew Darrow, P.E., CFM, Development Coordinator
August 30, 2012**

- 6-1 The commenter requests that this project be conditioned to mitigate peak flow rates to pre-development levels for 10- and 100-year storm events per the Placer County Stormwater Management Manual.
- As described on page 13-14 of the Draft EIR, preliminary drainage calculations show a respective post-development increase of 0.4 and 0.3 cfs for the 10- and 100-year storm events, respectively. These project flows represent an increase of less than 3% over pre-project conditions. This difference is considered negligible and was found to be less than significant. Additionally, Mitigation Measure 13-1c requires the submittal of a drainage report as a part of the Improvement Plan submittal. This report would address design of the detention basin and would be prepared in accordance with Placer County standards.
- 6-2 The commenter asks that the applicant confirm the accuracy of the 10- and 100-year pre-project peak flow rates listed on page 13-13 of the Draft EIR, and adjust the post-project peak flow rate increases if necessary.
- The project flows have been checked and updated. Text at the bottom of page 13-13 of the Draft EIR has been revised as shown below to reflect an error in the Draft EIR and is included in Chapter 3 of this Final EIR. These revisions do not constitute new significant information or alter conclusions regarding environmental impacts contained in the Draft EIR.
- Preliminary calculations of pre-and post-project flows were calculated by Wood Rodgers (April 2012). Pre-project flows are estimate to be ~~13.3~~12.9 cubic feet per second (cfs) for the 10-year event and ~~10~~22.4 cfs for the 100-year event. The 10-year and 100-year post project flows are estimated to result in a 3% and 1% increase respectively, in flows from pre-development levels. This results in an approximate post-development increase in flow of 0.4 cfs for the 10-year event and 0.3 cfs for the 100-year event.
- 6-3 The Flood Control and Water Conservation District requests that the applicant provide a copy of the preliminary drainage report, as well as any future environmental documents, for its review and comment. Placer County will provide a copy of the preliminary drainage report and any future environmental documents related to the proposed project to the District for review.

7

SIERRA COUNTY
 Department of Planning and Building Inspection
 P.O. Box 530
 Downieville, California 95936
 (530) 289-3251 (800) 655-3251
 Fax (530) 289-2828



Tim H. Beals
 Director
 via certified mail
 &

e-mail: cdnecs@placer.ca.gov

September 6, 2012

Maywan Krach
 Placer County Community Development Resource Agency
 Environmental Coordination Services
 3091 County Center Drive, Suite 190
 Auburn, CA 95603

Re: Cabin Creek Biomass Facility Project Draft EIR

Dear Ms. Krach:

Please accept the comments herein from the Sierra County Board of Supervisors regarding the proposed Cabin Creek Biomass Facility Project DEIR that is currently released for public review.

The County Board of Supervisors is very concerned over potential impacts to the existing biomass plant located at Loyalton. While it has been suggested that the proposed project does not have any impact on the Loyalton plant, we do not find any clear indication that this matter has been analyzed and that it has been established that an impact does not exist that could be deleterious to the future operation of the Loyalton biomass plant nor the economic stability of the eastern Sierra Valley region, Loyalton in particular.

Please confirm or otherwise provide clear information that the proposed project does not have any short term or long term physical or economic impacts, neither direct or indirect nor cumulative, on the Loyalton biomass plant. Also, we would strongly urge you to consider as proposed mitigation to potential impacts related to competition for fuels and availability of fuels to satisfy the potential demands of both plants, some form of commitment to fuel procurement protocols and implementation of potential procurement agreements that could serve to benefit both biomass plants in the region.

Sierra County appreciates the outreach offered by Placer County earlier in this year and further appreciates the working relationship that we have experienced on this and other projects. We feel that with proper mitigation, concerns over fuel procurement and market issues can be adequately addressed. The Board of Supervisors is very concerned over any impacts to the Loyalton plant and the concurrent impacts to a most fragile economic condition now in existence in the eastern Sierra County region and wants a clear understanding and assurance that potential impacts have been analyzed and clear evidence exists that there will not be any impact.

Thank you.

Sincerely yours,

A handwritten signature in black ink that reads "Tim H. Beals" with a circled "D" next to the name.

Tim H. Beals
 Director of Public Works and Planning
 Sierra County

TMS:bwj 0902

7-1

**Letter 7
Response****Sierra County Department of Planning and Building Inspection
Tim H. Beals, Director of Public Works and Planning
September 6, 2012**

7-1

The commenter states that the Sierra County Board of Supervisors is very concerned about impacts to the biomass plant located at Loyalton. The commenter also states that they do not find any clear indication that this matter has been analyzed and that it has been established that an impact does not exist that could be deleterious to the future operations of the Loyalton biomass plant and to the economic stability of the eastern Sierra County and Loyalton area.

The commenter states that with proper mitigation, concerns over fuel procurement and market issues can be adequately addressed. The Board of Supervisors wants a clear understanding and assurance that potential impacts have been analyzed and clear evidence that there will not be any impact.

Biomass is a waste product of timber harvest or fuel reduction thinning operations. The Applicant has worked with all of the federal, state, and local agencies to determine the amount of biomass that would be available to the proposed project, based on the past and future management plans of these agencies.

As mentioned in Section 3.4.3, Woody Biomass Fuel Supply, of the Draft EIR, the fuel procurement study for the proposed biomass facility used a 40-year planning horizon when forecasting fuel availability. This time period was selected as it coincided with the commercial service life of the proposed Cabin Creek Biomass Facility. The fuel study included historic data from both public land management agencies and private landowners to forecast sustainably available biomass fuel.

Also described in Section 3.4.3 of the Draft EIR is the demand created by current biomass material markets in the region; the current demand is approximately 40,350 BDT per year. This figure includes fuel demand from a number of existing facilities including the currently idle Sierra Pacific Industries facility at Loyalton. The material that the Cabin Creek Biomass Facility would use is not likely to be used by Loyalton because of the cost of removal of the material from the forest and the distance to Loyalton. Historically, the facility at Loyalton has not taken forest-sourced material from in-field locations in the area, which is why it is currently burned in piles. Regardless, the County's fuel supply study states that there is an estimated 112,440 BDT per year available and the proposed project would not exceed 17,000 BDT per year. More than 50 percent of the fuel within the core fuel supply area (CFSa) would be available at such time that Loyalton were to be repowered. As such, there would be adequate fuel supplies to support operation of both plants.

Placer County has signed an MSA with the USFS. The purpose and primary objective of this Tahoe Basin Biomass MSA is to reduce the number of acres of fuels burned annually on national Forest System (NFS) lands within the Lake Tahoe Basin by entering into a stewardship agreement with Placer County for removal of biomass from these lands. The biomass removed from in-field locations would be generated during implementation of fuels reduction and forest health treatments currently being conducted and/or planned within the WUI on NFS lands.



Town Council

Jöan deRyk Jones, Mayor

Barbara Green, Vice Mayor

Dr. Mark Brown D.C., Council Member
Carolyn Wallace Dee, Council Member
Richard Anderson, Council Member



Department Heads

Tony Lashbrook, Town Manager
J. Dennis Crabbs, 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

September 6, 2012

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

RE: Town of Truckee Comments on Placer County Cabin Creek Biomass Facility Draft EIR

Dear Ms. Krach,

Thank you for the opportunity to comment on the Draft EIR for the proposed Placer County Cabin Creek Biomass Facility. At a recent Town Council meeting, Placer County and Town staff presented an overview of the proposed biomass facility and its associated environmental impacts. In general, the Town finds that the environmental impacts are minimal and that in certain cases, beneficial impacts are anticipated. However, several questions and/or comments were made during public comment and discussion that the Town Council wishes to forward to Placer County for inclusion in the Final EIR. The below list is provided to summarize the Town's input on the proposed project.

8-1

State Route 89 South "Mousehole"

The Draft EIR states that there are cumulative traffic impacts which result from construction of the biomass facility and that payment of traffic impact mitigation fees is required to reduce impacts to less than significant levels. The Town of Truckee recognizes the previous agreement between the Town and Placer County regarding traffic impact mitigation fees and that each of our fee programs accounts for impacts we may cause in the other jurisdiction. The Town only requests that the importance of improvements (pedestrian and vehicular) to the Mousehole are recognized as beneficial and necessary to both residents of the county and the town.

8-2

Air Quality Monitoring Stations

A number of concerns were expressed regarding air quality issues which may impact nearby Truckee residents. The nearest air quality monitoring station is located in central Truckee at the Truckee Fire Protection District station on Donner Pass Road. Given the stated increases in respirable particulate matter, the Town would request consideration as to the installation of an additional monitoring station closer to the biomass plant and impacted residences towards

8-3



10183 Truckee Airport Road, Truckee, CA 96161-3306
www.townoftruckee.com

Administration: 530-582-7700 / Fax: 530-582-7710 / email: truckee@townoftruckee.com
Community Development: 530-582-7820 / Fax: 530-582-7889 / email: cdd@townoftruckee.com
Animal Services/Vehicle Abatement: 530-582-7830 / Fax: 530-582-7889 / email: animalservices@townoftruckee.com
Police Department: 530-550-2328 / Fax: 530-550-2326 / email: policedepartment@townoftruckee.com
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Page 2

Truckee: A closer monitoring station may be able to provide more relevant information on increases in respirable particulate matter and how that could impact nearby residences.

8-3
Cont'd

Traffic Volume Increases

The Draft EIR states that 28% of traffic trips could be traveling through Truckee south toward the biomass facility. While a majority of the heaviest usage will occur during the summer months, concerns were expressed regarding impacts on traffic congestion at the Mousehole and during heavy snow events. From comments made at the meeting, it appears unlikely that significant truck traffic will occur during such snow events. However, the Town would request that consideration be given to truck scheduling during maximum congestion periods.

8-4

Based on the Town's understanding of the Draft EIR analysis, it appears the primary emphasis of the trip analysis focused on traffic traveling through Truckee via Interstate 80. However, it is possible that trucks will "cut through" Truckee if they are traveling on State Route 267 and their final destination is the biomass facility. In these cases, the trucks may travel on local roads which could impact local traffic patterns. Given this possibility, the Town would like consideration of a condition prohibiting using local Truckee roadways, but rather that trucks utilize the state and interstate system.

Thank you again for the opportunity to comment on the proposed biomass facility. Following the Town Council's review of the proposed facility, the Council concluded that this is an exciting and unique opportunity for the Truckee-Tahoe region. If you have any further questions on this letter, please feel free to contact Jenna Endres, Associate Planner at (530) 582-2922 or by email at jendres@townoftruckee.com.

8-5

Sincerely,



Joan deRyk Jones, Mayor
Town of Truckee

- cc: Tony Lashbrook, Town Manager
- John McLaughlin, Community Development Director
- Jenna Endres, Associate Planner

**Letter 8
Response**

**Town of Truckee
Joan deRyk Jones, Mayor
September 6, 2012**

- 8-1 The commenter provides prefatory remarks and an introductory statement that the Town of Truckee Council wishes to see a number of comments and questions addressed in the Final EIR. The specific questions and concerns are listed in the comments below. See responses to comments 8-2 through 8-5 below.
- 8-2 The commenter notes that the Draft EIR identified cumulative traffic impacts from operation of the biomass facility and that payment of traffic impact mitigation fees is required. The Town of Truckee requests that the importance of pedestrian and vehicular traffic improvements to the Mousehole be recognized as beneficial and necessary to both Town and county residents.
- See the response to comment 8-4, below, for a discussion of the Draft EIR analysis of cumulative traffic impacts and related impact fees.
- This comment does not address any new environmental impacts. Placer County agrees that transportation projects in the region that help reduce congestion and improve pedestrian safety are beneficial to all roadway users.
- 8-3 The commenter expresses concern that emissions associated with the proposed project would adversely affect residents in the Town of Truckee, particularly emissions of particulate matter, and the commenter notes the presence of an air quality monitoring station at the Truckee Fire Protection District Station on Donner Pass Road. See the responses to comments 5-2 and 5-3.
- The commenter also requests the installation of an additional air quality monitoring station “closer to the biomass plant and impacted residences towards Truckee.”
- With regard to project-related emissions and impact to residents in the Town of Truckee, staff at PCAPCD performed dispersion modeling using the U.S. Environmental Protection Agency (U.S. EPA) SCREEN3 model for emissions from the biomass plant. PCAPCD modeling indicates that, under extreme worst-case conditions and assuming the plume of exhaust from the biomass facility was moving directly toward Truckee, the biomass facility would contribute a peak one-hour concentration of PM of approximately 1.3 microgram per meter cubed ($\mu\text{g}/\text{m}^3$) to the ambient concentration level at the Truckee Fire Station monitoring station. According to PCAPCD staff, this concentration is well within the statistical deviation of the background PM concentrations measured at the station which can exceed $100 \mu\text{g}/\text{m}^3$ over a 24-hour period. Over longer averaging times, PM contributions are projected to be much lower, at $0.1 \mu\text{g}/\text{m}^3$, which is well below the 24-hour NAAQS of $35 \mu\text{g}/\text{m}^3$ and annual average NAAQS of $15 \mu\text{g}/\text{m}^3$ for $\text{PM}_{2.5}$, which is a subset of total PM. Thus, there is very low probability that emissions from the proposed biomass facility could contribute to an exceedance of the ambient air quality standard for PM. Because of the low emission concentrations projected, there is no evidence to support the need to require a monitoring station be installed at the biomass facility or in other locations of Truckee closer to the project site.
- 8-4 The commenter states concerns regarding traffic congestion impacts at the “mousehole” and during heavy snow events. (Note: The “mousehole” is a two-lane section of SR 89 that crosses under the Southern Pacific Railroad tracks). The commenter requests that consideration be

given to truck scheduling during maximum congestion periods. The commenter also requests that Placer County impose a condition prohibiting use of local Truckee roadways by trucks.

The Draft EIR notes on page 8-13 that the forest thinning season, when biomass material is collected from locations around Lake Tahoe, is primarily limited to the dry season (approximately May 1 to October 15). Therefore, truck hauling during the winter, when heavy snowfall occurs, would be limited, if at all.

As described in the traffic impact analysis provided in the Draft EIR on pages 8-11 to 8-14, it is estimated that 3 truck loads (6 daily trips) would travel to and from the proposed biomass facility from Placer/Nevada County with one trip taking place during the PM peak hour. Trips originating on the east shore of Lake Tahoe would use routes that would travel south from I-80 on SR 89. It is estimated that 3 loads per day (6 daily trips), with one PM peak hour trip would originate from the east shore. This would be a total of 12 daily trips (one in each direction) using SR 89 and passing through the "mousehole", two of the trips being PM peak hour trips. The discussion under Impacts 8-1 and 8-2 of the Draft EIR concludes that the addition of these trips to the roadway network would have a less than significant impact on intersection operations (level of service) and would not meet the criteria for installing a traffic signal at the SR 89/Cabin Creek Road intersection.

The Draft EIR cumulative impacts analysis on pages 18-35 through 18-37 concluded that the proposed project would make a considerable contribution to a significant cumulative traffic impact on County roadways. While the proposed project would not cause the LOS at the study intersection to degrade to an unacceptable LOS under cumulative plus project conditions, the project would, nonetheless, contribute traffic trips to the County roadway system. On a long-term cumulative basis, the County requires that any project that contributes traffic trips to pay the County's traffic impact fees. Consistent with this County requirement, Mitigation Measure 18-1 requires the Applicant to pay traffic impact fees that are in effect for the Tahoe Resorts area. Payment of this fee would reduce the project's contribution to this significant cumulative impact to a less than considerable level.

It is considered unlikely that a truck hauling biomass material to the site would cut through Truckee on local streets, except for trucks hauling WUI material from within the local community, because this would add time to the trip related to additional traffic signals and slower speeds. Further, as described in the Draft EIR no significant project-related traffic impacts were identified. Nonetheless, the County agrees to incorporate the following language into the Conditional Use Permit as a condition of project approval:

Biomass truck deliveries shall avoid travel through the Town of Truckee on either Donner Pass Road or West River Road, unless an emergency, road closure, or other unique circumstance would necessitate travel on these roadways. Further, biomass truck deliveries on SR 89, between Cabin Creek Road and I-80, shall be prohibited on federal holidays and Sundays.

8-5 The commenter concludes by thanking Placer County for the opportunity to comment.