

TOWN OF TRUCKEE

PUBLIC DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

BACKGROUND

Application No.: 2017-00000161/TM

Project Name: West River Cottages Tentative Map, Historic Design Review/Demolition Review, Planned Development and Zoning Clearance

Project Proponent: Brian Heim

Lead Agency: Town of Truckee Planning Commission
c/o Truckee Community Development Department
10183 Truckee Airport Road
Truckee, CA 96161
(530) 582-7820

(Documents and other material upon which the decision for the adoption of the Negative Declaration is based may be found at the above location.)

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Other agencies whose approval may be required (e.g. permits, financing approval, or participation agreement):

- Truckee Donner Public Utility District
- Regional Water Quality Control Board, Lahontan Region
- Department of Fish and Wildlife, State of California
- Nevada County Department of Environmental Health
- Truckee Fire Protection District
- Truckee Sanitary District
- Tahoe-Truckee Sanitary Agency
- United States Army Corps of Engineers

PROJECT DESCRIPTION AND LOCATION

Project Description: The applicant is requesting modifications to several properties located within Truckee's Historic Preservation Overlay District. One of the properties (10199 West River Street) is the location of seven existing historic cottages. A second parcel (10191 West River Street) is the location of an existing historic residence and garage. Both properties are rated as Category B (Contributory) historic resources in Truckee's Historic Resource Inventory. A total of five properties are involved in the application due to the fact that a previous Lot Line Adjustment moved the lot lines between the four parcels to the east (APNs 019-130-050-000, 019-130-051-000, 019-130-052-000 and 019-130-048-000), and modifications to the fifth contiguous parcel (APN 019-130-006-000) require approval of a Tentative Map; however, no modifications are proposed to the three eastern properties as part of this application.

The applicant is requesting approval of the following land use entitlements:

- 1) **Tentative Map** to adjust the lot line between the five parcels on West River Street. Includes moving the existing lot line between APNs 019-130-006-000 and 019-130-050-000 to the east side of the existing garage at 10191 West River Street; dedicating portions of three parcels to the Town of Truckee; dedication of a storm drain easement on the third lot to allow for maintenance of an existing storm drain; dedication of right of way on Riverside Drive; and subdividing the parcel at the corner of West River Street and Mill Street (APN 019-130-006-000) into seven single-family residential parcels for individual ownership;
- 2) **Historic Design Review/Demolition Review** to relocate and rehabilitate seven historic cottages and demolish an existing single-family residential garage and shed;
- 3) **Planned Development** to modify the development standards of the DRM zoning district, which applies to standalone residential projects in the DMU zoning district including setbacks and snow storage, and to reduce the required parking demand from 14 spaces to seven spaces (one space per dwelling unit); and
- 4) **Zoning Clearance** for projects with less than 5,000 square feet of gross floor area and less than 26,000 square feet of site disturbance in Downtown Residential and Downtown Commercial and Manufacturing zoning districts

Figure 1 depicts the project location, Figure 2 depicts the existing site conditions, and Figure 3 depicts the proposed site design:



Figure 1: Project Location



Figure 2: Existing Site Conditions

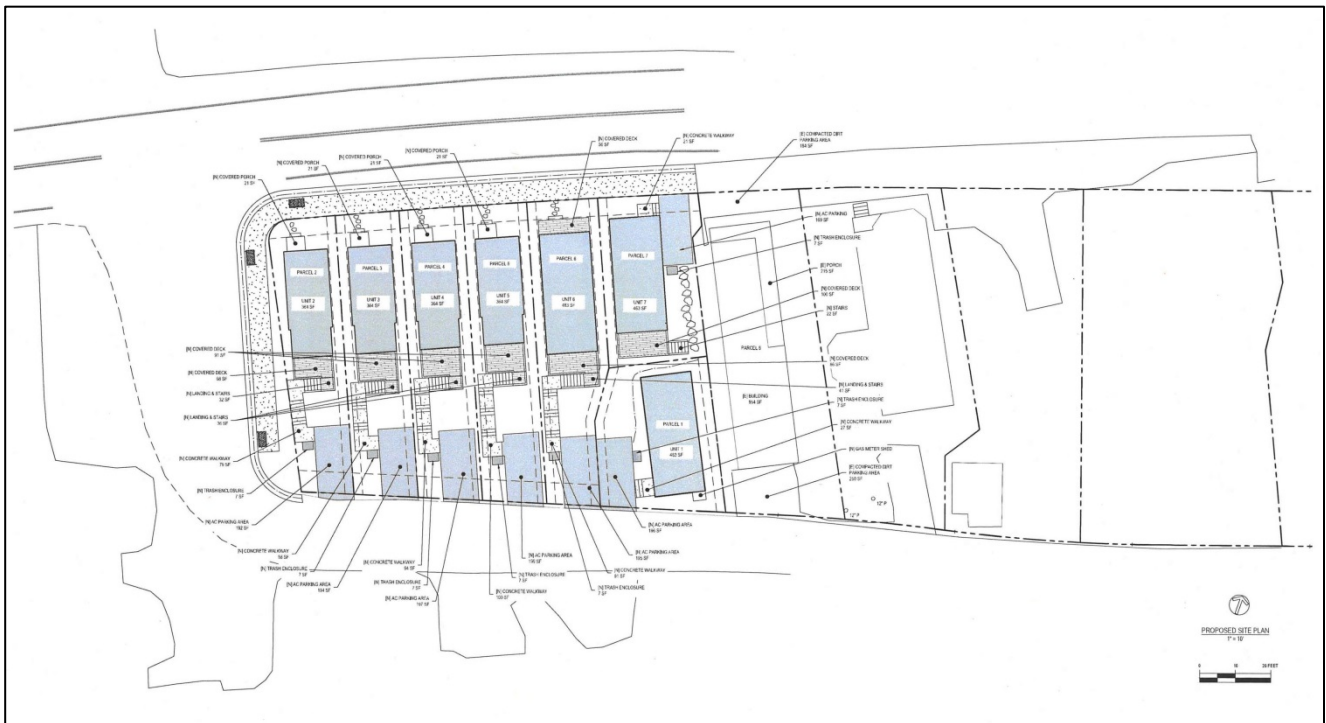


Figure 3: Proposed Site Design

Project Location and Environmental Setting: The project site is located in Truckee's historic Downtown area, at the corner of the Mill Street/West River Street intersection (see Figure 1). The project includes five contiguous parcels (see Figure 2). Adjacent uses include residences to the east and across Riverside Drive to the south; a vacant parcel (the location of the old Nevada County Corporation Yard) to the west, across Mill Street; and industrial uses across West River Street to the north. The Union Pacific railroad is located approximately 150 feet to the north of the project site. The project site slopes from north to south toward Riverside Drive and will create approximately 0.25 acres of ground disturbance. The Truckee River is located to the south of Riverside Drive, approximately 100 feet from the project site.

The five properties included in the project site have historically been developed with residential uses, and would be affected by the proposed project as described below:

- The property at 10199 West River Street (APN 019-130-006-000) is the location of seven existing historic cottages; the property is rated as Category B (Contributory) historic resource in Truckee's Historic Resource Inventory. These seven structures are proposed to be relocated within the project site and rehabilitated.
- The property at 10191 West River Street (APN 019-130-050-000) is the location of an existing historic residence and garage; the property is rated as Category B (Contributory) historic resource in Truckee's Historic Resource Inventory. The lot line between this property and the cottages property to the west is proposed to move to five feet from the historic residence in order to increase the size of the cottages parcel to accommodate the relocation of the cottages structures. The property line relocation will require demolition of the existing garage on the property at 10191 West River Street.
- The property at 10187 West River Street (APN 019-130-051-000) is the location of an existing historic residence; the property is rated a Category A (Essential) historic resource in Truckee's Historic Resource Inventory. No modifications to this property are proposed; however, an easement for an existing drainage through the property is required as part of the project, and upgrades to the existing drainage infrastructure may be required.
- The two easternmost parcels at 10175 and 10167 West River Street (APNs 019-130-052-000 and 019-130-048-000) are currently vacant with the exception of an existing shed on the property at 10175 West River Street. No changes to these parcels are proposed. These properties are involved in the application due to the fact that a previous Lot Line Adjustment moved the lot lines between the four parcels to the east, and modifications to the fifth contiguous parcel (APN 019-130-006-000) require approval of a Tentative Map.

The project site has been previously disturbed by past grading and residential construction. A historic residence on the property at 10167 West River Street (APN 019-130-048-000) was demolished in 2017. The site has minimal vegetation.

Project Baseline: The site is currently developed with residential properties and has been previously disturbed by past grading and residential construction.

The site is proposed to be served by public water and electrical services from Truckee Donner Public Utility District and public sewer by Truckee Sanitary District.

BACKGROUND REPORTS, SUPPORTING DOCUMENTATION AND REFERENCES

The following documents have been used to support the analysis of potential environmental impacts from the proposed project, and are incorporated herein by reference for this Initial Study:

- a) Town of Truckee 2025 General Plan (<http://www.townoftruckee.com/government/community-development/planning-division/plans-and-regulations/2025-general-plan>)
- b) Town of Truckee Development Code, January 11, 2019
(<http://www.townoftruckee.com/government/community-development/planning-division/plans-and-regulations/development-code/title-18-development-code>)

EVALUATION OF ENVIRONMENTAL IMPACTS

1. AESTHETICS.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?				✓
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

Setting

The subject site is located surrounded by existing industrial and residential development. Adjacent uses include residences to the east and south; a vacant parcel (former location of the Nevada County Corporation Yard) to the west; and industrial uses to the north. The railroad is located approximately 150 feet north of the project site and the Truckee River is located approximately 100 feet to the south of the project site. The property is not identified by the Truckee 2025 General Plan Community Character Element Figure CC-1 as a scenic corridor or scenic vista, and does not contain any prominent slope exposures, ridgelines or major streams. No slopes in excess of 20 percent are located on the property. An existing major storm drain is located within the Tentative Map area, between two of the parcels to the east (APNs 019-130-050-000 and 019-130-051-000), which are developed with existing single-family residences; no modifications to these parcels are proposed as part of this project.

The General Plan Land Use Element identifies that the project site is located within the Downtown Specific Plan Area (DSPA). Plan Areas are designated in the General Plan to provide detailed land use mapping, goals and policy direction. (See Section 8, *Land Use, Planning, Population and Housing*, for information on land use designations.) The DSPA includes an approximately one square mile area encompassing Truckee's historic core, which is the subject of ongoing special study and planning. A Specific Plan was adopted for the Downtown Area in 1997. Allowed land uses include commercial, industrial, public and residential uses, and mixed-use commercial and residential uses. Densities and intensities for the DSPA are specified in the Downtown Specific Plan. The average residential density applied across the DSPA will not exceed 10 dwelling units per acre.

Impact Discussion

- a) The project site is not identified as a scenic vista in the Town of Truckee 2025 General Plan. The property was previously graded and has existing development. There are no slopes in excess of 20 percent. There is **no impact** on any scenic vista.
- b) The current Caltrans Map of Designated Scenic Routes indicates that there are no officially designated state scenic highways with the Town of Truckee. Interstate 80 and State Highway 89 (north of Interstate 80) are eligible to become state scenic highways but are not officially designated. The Development Code does designate Interstate 80 as a Scenic Corridor; however, the proposed development is located outside the corridor boundary. Further, the project area does not have any scenic resources on site. There is **no impact**.

- c) General Plan Conservation and Open Space Policy 7.1 states that discretionary development shall be clustered away from slopes in excess of 30 percent and that discretionary development on all slopes in excess of 20 percent shall have a site-specific review of soil type, vegetation, drainage, slope and building placement to determine proper site design. Development Code Section 18.36.040.C further states that slopes exceeding 20 percent shall be avoided if there is sufficient area onsite with slopes less than 20 percent to accommodate reasonable development and streets. No disturbance of slopes in excess of 20 percent is proposed. Additionally, the project is required to meet the standards of the Development Code design guidelines and requirements for screening and buffering.

The immediate visual character of the area surrounding the proposed project site consists of residential buildings to the east and south; a vacant parcel to the west (the location of the former Nevada County Corporation Yard); and industrial uses to the north. The project proposes to relocate and rehabilitate existing historic resources on the site and to demolish a residential garage on the adjacent parcel. A historic resource consultant hired by the Town of Truckee determined that the proposed modifications would not negatively impact the historic character of the historic structures or surrounding character area. The project will not conflict with applicable zoning and other regulations governing scenic quality. Therefore, the project will have a **less-than-significant** impact on the visual character of the site and its surroundings.

- d) The proposed project is required to comply with the Town of Truckee standards for exterior lighting (Development Code Section 18.30.060 – Exterior Lighting and Night Sky). The purpose of these standards is to reduce glare and avoid light trespass beyond the property boundaries. As part of the historic rehabilitation, the project proposes new exterior light fixtures on the residential structures to replace existing exterior light fixtures which were likely installed prior to the Town’s current exterior lighting standards. The proposed fixtures will be required to meet the current requirements. Therefore, the project will have a **less-than-significant** impact on day or nighttime views in the area.

Mitigation Measures

None required.

2. AGRICULTURAL AND FOREST RESOURCES.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p> <p>Would the project:</p>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as				✓

defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				✓

Setting

The subject site is developed with existing residential structures and is surrounded by existing industrial and residential development. No agricultural lands or forest resources are located on the project site or in the vicinity of the project site.

Impact Discussion

- a) Eastern Nevada County contains no prime agricultural land based on farmland soil mapping. Important Farmland Maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency does not include eastern Nevada County and the Truckee area. For this reason, the project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use (California Department of Conservation, 2010). There is **no impact**.
- b) The project is located on commercially and residentially designated land within the Town of Truckee. The project site consists of five properties, none of which is under the provisions of an active Williamson Act Contract. There is **no impact**.
- c) The project is located on mixed-use residentially and commercially zoned uses under the Town of Truckee Development Code, which allows single-family residential uses by-right. There will be no conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland zoned Timberland Production. There is **no impact**.
- d) The project site is developed with existing single-family residences and was previously graded for residential development. The project will not result in the loss of forest land or conversion of forest land to non-forest use. There is **no impact**.
- e) There will be no changes to the existing environment that would result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. There is **no impact**.

Mitigation Measures

None required.

References

California Department of Conservation. 2016. Nevada County Important Farmland Map.

3. AIR QUALITY.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the Truckee Particulate Matter Air Quality Management Plan or other applicable air quality plan?				✓

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				✓
c. Expose sensitive receptors to substantial pollutant concentrations?				✓
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				✓

Setting

The Town of Truckee is located within the Mountain Counties Air Basin. The Northern Sierra Air Quality Management District (NSAQMD) is the local agency for air quality planning with authority over air pollutant sources within Nevada County, including the Truckee area. Nevada County is currently designated a non-attainment area by the State of California for 8-hour ozone (*epa.gov*).

Reactive organic gases (ROG) are compounds comprising primarily atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Other sources of ROG include evaporative emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. Adverse effects on human health are not caused directly by ROG, but rather by reactions of ROG to form secondary pollutants such as ozone.

Nitrogen oxides (NOX) serve as integral participants in the process of photochemical smog production. The two major forms of NOX are nitric oxide (NO) and nitrogen dioxide (NO₂). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO₂ is a reddish-brown irritating gas formed by the combination of NO and oxygen, a byproduct of fuel combustion. NO₂ also contributes to the formation of PM₁₀ (particulates having an aerodynamic diameter of 10 microns—or 0.0004 inch—or less in diameter) and ozone. NOX acts as an acute respiratory irritant and increases susceptibility to respiratory pathogen

Particulate matter consists of solid and liquid particles of dust, soot, aerosols, and other matter, which are small enough to remain suspended in the air for a long period of time. Particulate matter can be divided into several size fractions. Coarse particles (PM₁₀) are between 2.5 and 10 microns in diameter and arise primarily from natural processes, such as wind-blown dust or soil. Fine particles (PM_{2.5}) are less than 2.5 microns in diameter and are produced mostly from combustion or burning activities. Fuel burned in cars and trucks, power plants, factories, fireplaces, and wood stoves produces fine particles. The level of PM_{2.5} in the air is a public health concern because it can bypass the body’s natural filtration system more easily than larger particles and can lodge deep in the lungs. A portion of the particulate matter in the air is due to natural sources such as wind-blown dust and pollen, which are associated with the aggravation of respiratory conditions. Man-made sources include combustion, automobiles, field burning, factories, and road dust. Primary sources of PM₁₀ emissions are road traffic, construction, open burning, and wildfires. The amount of particulate matter and PM₁₀ generated is dependent on the soil type and the soil moisture content. Traffic also generates particulate matter emissions through entrainment of dust and dirt particles that settle onto roadways and parking lots.

NSAQMD has developed thresholds of significance to determine air quality impacts associated with land use development proposals. Thresholds of significance are based on a source’s projected impacts and are a basis from which to apply mitigation measures (*NSAQMD 2009*).

Under the Particulate Matter Air Quality Management Plan, large development projects are required to offset emissions generated by the project through mitigation measures and/or payment of a mitigation fee. Large development projects are identified as a project that results in 100 or more single-family

residential lots, 200 or more multi-family residential units, 40,000 square feet or more of office, commercial and/or industrial floor space, or any equivalent combination thereof.

The proposed project involves the rehabilitation of seven existing single-family residences on the project site and a total of five existing parcels. The proposed Tentative Map would create a total of 11 single-family residential parcels, but would not increase the number of existing residential dwelling units. The project does not meet the definition of a “large development project” under the Particulate Matter Air Quality Management Plan; therefore, no mitigation measures and/or payment of mitigation fees is required.

Impact Discussion

a-d) No increase in the existing number of residential units within the project area will result from the proposed project, and no expansion or intensification of the existing use is proposed. There is **no impact**.

Mitigation Measures

None required.

References

Town of Truckee. 1999. Particulate Matter Air Quality Management Plan.

4. BIOLOGICAL RESOURCES.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✓
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		✓		
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✓		
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

Ecological Setting

The project site consists of developed residential parcels that have been previously disturbed through grading and residential construction. The existing parcels have minimal vegetation and provide no known habitat for special status species. No riparian habitat or wetlands are located within the project site. The Truckee River is located approximately 100 feet to the south, and the project site is located outside the 100-year floodplain.

Regulatory Setting

The following discussion identifies federal and State environmental regulations that serve to protect sensitive biological resources relevant to the proposed project and CEQA review process.

Special-Status Species

Special-status plants and animals are species that are legally protected under the State and Federal Endangered Species Acts, and other regulations, and species that are considered rare by the scientific community. They are defined as:

- Plants and animals that are listed or proposed for listing as Threatened or Endangered under the California Endangered Species Act (Fish and Game Code 1995 §2050 et seq., 14 CCR §670.1 et seq.) and/or the Federal Endangered Species Act (50 CFR 17.12 for plants, 50 CFR 17.11 for animals; and various notices in the Federal Register for proposed species).
- Plants and animals that are Candidates for possible future listing as Threatened or Endangered under the Federal Endangered Species Act (50 CFR 17.12 for plants, 59 FR 58982 November 15, 1994 for animals).
- Plants and animals that are considered Federal Species of Concern (formerly C2 candidate species).
- Plants and animals that meet the definition of rare or endangered under CEQA (14 CCR §15380), which includes species not found on State or Federal Endangered Species lists.
- Animals that are designated as "Species of Special Concern" by CDFW (1999).
- Animal species that are "fully protected" in California (Fish and Game Code, §3511, §4700, §5050 and §5515).

Special-status plant species also include species on CNPS Inventory List 1A (presumed extinct in California), List 1B (plants rare, threatened, or endangered in California and elsewhere), or List 2 (plants rare, threatened, or endangered in California, but more common elsewhere). These species fall within state regulatory authority under the provisions of the California Environmental Quality Act (CEQA) Guidelines. CNPS Inventory List 3 (plants about which more information is needed, a review list) and List 4 (plants of limited distribution, a watch list) are considered to be of lower sensitivity, and generally do not fall under specific state or federal regulatory authority. Specific mitigation considerations are generally required for species with federal or state protection or that are in List 1 and 2 categories.

Sensitive plant communities include habitats that fulfill special functions or have special values. Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife (CDFW). CDFW ranks sensitive communities as 'threatened' or 'very threatened' and keeps records of their occurrences in its Natural Diversity Database. Also, CNDDDB vegetation alliances are ranked 1 through 5. Alliances ranked globally (G) or statewide (S) as 1 through 3 are considered sensitive (Sawyer, et.al. 2009). Impacts to sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or U.S. Fish and Wildlife Service (USFW) must be considered and evaluated under CEQA.

Sensitive habitats may include areas that fulfill special functions or have special values, such as wetlands, streams, and riparian habitat. These habitats may be regulated under federal regulations (i.e. the Clean Water Act), state regulations (such as the Porter-Cologne Act, California Department of Fish and Wildlife's Streambed Alteration Program), and local ordinances or policies.

Wetlands and Waters of the U.S.

The U.S. Army Corps of Engineers (Corps) regulates “Waters of the United States” pursuant to Section 404 of the Clean Water Act (CWA). “Waters of the US” are defined broadly as waters potentially used in commerce, including interstate waters and wetlands, all other waters (intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). Potential wetland areas are determined by the three criteria stated in the *Corps of Engineers Wetlands Delineation Manual* (“Manual”) (1987) and the *Western Mountains, Valleys, and Coast Regional Supplement* (“Supplement”) (2010). Those criteria are hydrophytic vegetation, hydric soils, and wetland hydrology. Areas that are inundated for sufficient duration and depth to exclude growth of upland and hydrophytic vegetation are subject to Section 404 of the CWA jurisdiction as “other waters” and are often characterized by an ordinary high water line. “Other waters” generally include lakes, rivers, streams, and their tributaries. The placement of fill material into Waters of the US (including wetlands) generally requires authorization from the Corps under Section 404.

Waters of the State

Waters of the State are regulated by the Regional Water Quality Control Board (RWQCB) pursuant to the State Water Quality Certification Program, which regulates discharges of fill and dredged material under Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. “Waters of the State” are defined by the Porter-Cologne Act as “any surface water or groundwater, including saline waters, within the boundaries of the state”. RWQCB protects all waters in its regulatory scope, but has special responsibility for wetlands, riparian areas, and headwaters. These waterbodies have high resource value, are vulnerable to filling, and are not systematically protected by other programs. RWQCB jurisdiction includes wetlands and waters that may not be regulated by the Corps pursuant to Section 404.

Projects that require a Corps permit, or fall under other federal jurisdiction, and have the potential to impact Waters of the State, are required to comply with the terms of the Water Quality Certification determination. If a proposed project does not require a federal permit, but does involve dredge or fill activities that may result in a discharge to Waters of the State, the RWQCB has the option to regulate the dredge and fill activities under its state authority in the form of Waste Discharge Requirements.

Migratory Bird Treaty Act

This treaty with Canada, Mexico and Japan makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds. The law applies to the removal of nests (such as swallow nests on bridges) occupied by migratory birds during the breeding season. California Fish and Game Code (Sec 3500) also prohibits the destruction of any nest, egg, or nestling.

Town of Truckee Development Code

Development Code Section 18.30.050 (Drainage and Stormwater Runoff) requires Minor Use Permit approval for any disturbance within 200 feet of a wetland. Development Code Section 18.30.050.B.3 also requires that runoff into wetland areas shall not be increased above or decreased below pre-project levels and that runoff into wetland areas shall be treated prior to release into the wetland. The purpose of these requirements is to ensure that there will be no indirect impact to wetlands due to project proximity or operations.

Development Code Section 18.46.040 (Wetlands) provides standards intended to preserve wetland areas. Development projects resulting in the disturbance of wetlands require approval of a Minor Use Permit. The Minor Use Permit may only be approved by the review authority if the following findings can be made: 1) The wetlands cannot be avoided and there are no feasible alternatives or mitigation to disturbance of the wetlands; 2) Any wetlands removed or destroyed as part of the project are mitigated by the restoration or creation of wetland habitat at a rate of 1.5 to 1 (1.5 units of restored

habitat for each unit of habitat removed or destroyed); and 3) The disturbance and/or removal of the wetlands complies with all applicable Federal and State regulations.

As previously noted, the project site consists of developed single-family residential parcels with minimal vegetation. No wetlands, riparian habitat or special-species habitat have been identified within the project site.

Impact Discussion

- a) No species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, has been identified within the project site. Preconstruction surveys required under **Mitigation Measure 4a** will verify that no such species exist within the project site and will reduce potential impacts to **less than significant**.
- b) No riparian habitats or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services exist within the project site. There is **no impact**.
- c) No wetlands or waters of the United States or waters of the State exist on the project site. The project will not adversely affect any wetlands in the vicinity. There is **no impact**.
- d) The project will not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. **Mitigation Measure 4a** will reduce potential impacts to **less than significant**.
- e) The Town of Truckee recognizes the importance of trees and regulates the removal of trees through Development Code Section 18.30.155. While tree removal is not specifically prohibited within the Development Code, requirements are in place to ensure that trees designated for preservation in the site plans are able to survive following construction. A tree preservation and protection plan is required in compliance with the Development Code Section 18.30.155 prior to issuance of any grading, demolition or building permits. **Mitigation Measure 4b** will reduce potential impacts to **less than significant**.
- f) Currently there are no known adopted habitat conservation plans that would result in conflicts with the project. There is **no impact**.

Mitigation Measures

- 4a) Preconstruction surveys shall be conducted by a qualified biologist prior to any ground disturbance, including both plant and wildlife species. If special-status species are identified on the project site or will be disturbed by project activities, the applicant shall develop appropriate minimization measures to avoid potential impacts to the plant and wildlife species. Riparian habitat destruction should be avoided to the maximum extent practicable. Measures may include avoiding suitable habitat and conducting biological monitoring.

If special-study plant species are found on the site, the plants will be hand excavated and immediately relocated to a pre-determined replanting site. The replanting site will contain similar suitable habitat conditions, within the study area or general vicinity, and will be located a minimum of 50 feet from proposed construction activities. The exaction and replanting will be performed by a qualified botanist with previous experience with the special species plant. The replanting area will be fenced to prevent undesirable entry into the replanting area. To ensure long-term protection, signage will be installed on the fence that designates this area as a sensitive restoration site and will provide standard no trespassing language. A report summarizing the findings of excavation and replanting efforts will be prepared and submitted to the Town of Truckee and CDFW. The replanting area will be monitored for three years to determine the success of replanting efforts. Success is determined by the number of relocated

plants that survive and transplantation. If the success rate after three years is below 75 percent, consultation with CDFW will be required to develop appropriate remediation plans.

- 4b) Prior to issuance of grading, demolition or building permits, the applicant shall address Development Code Section 18.30.155 (Tree Preservation) which includes fencing at the dripline of all trees, no grade cuts or fill within six feet of the trunk of a tree to be retained or within the dripline, paving within the dripline shall be stringently minimized with no paving within six feet of the trunk.

References

None.

5. CULTURAL RESOURCES.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines?		✓		
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines?		✓		
c. Disturb any human remains, including those interred outside of formal cemeteries?		✓		

Setting

The project site is located within the Historic Preservation Overlay District in Downtown Truckee. Kautz Environmental Consultants, Inc. (Kautz) prepared a Town of Truckee Historic Resource and Architectural Inventory for the Town of Truckee in 2004. The inventory record for the project site identifies the properties at 10199 West River Street and 10191 West River Street as Category B (“Contributing”) historic resources.

The Kautz report was completed as part of a larger district inventory of 236 architectural resources, and focused on the overall history and character of the entire district. The report identified that the subject property at 10199 West River Street was a contributing element to the district, although not individually eligible for listing in the National Register of Historic Places (NRHP). This was based on the opinion that the property—exhibiting varying levels of integrity of setting, materials, workmanship, design, and feeling—was nonetheless a rare surviving collection of auto camp cabins.

Historic Resource Analysis

An evaluation of the proposed project was completed on May 14, 2019 by ZoAnn Campana, an Architectural Historian with Kautz. As part of this review, Campana reviewed the current historic status of the project site and analyzed the proposed project to identify potential impacts from the proposed modifications to the historic structures (including the proposed rehabilitation and relocation of the structures within the project site). The conclusions in Campana’s report were based on a site inspection of the project site on May 7, 2019; peer review of information provided by the applicant’s historic resource consultant, JRP Historical Consulting, LLC (JRP), including report letters dated June 2, 2017 and April 3, 2019; and a review of the application of accepted historic preservation principles and eligibility criteria set forth by the Secretary of Interior, the National Register of Historic Places, and Title 18 of the Town of Truckee Municipal Code.

Evaluation of 10199 West River Street

The Kautz report notes that the property at 10199 West River Street comprises seven small buildings that were most likely constructed in the 1920s and relocated to the present site in 1935, and that the structures have experienced a number of alterations since construction. The 2004 Kautz report and 2017 JRP report conflict regarding whether the subject property contributes to the historic character of the Truckee Historic National Register District (THNRD). While the 2004 Kautz report focused on the overall history and character of the entire district, the JRP report provides an in-depth, micro-level evaluation of the individual resource. JRP found that the property was a non-contributing element of the district based on its lack of integrity of materials, design, workmanship, and feeling, and contended that the property does not retain sufficient integrity to convey its historical significance.

Campana's evaluation, however, reached a different conclusion. While Campana found that the property does not possess the significance or integrity to be eligible for individual listing in the NRHP, she found that it appears to contribute to the TNRHD under Criteria A and C. Although some units on the property retain little integrity to its historic period of significance, the majority—particularly the four cabins prominently fronting onto West River Street—retain sufficient integrity to convey their significance as auto camp cabins dating to the 1920s-1930s. Alterations that have been made to the property were noted as follows:

- Design/Massing - Original front porches enclosed as additions on all but one unit. Rear addition added to most units.
- Materials - Original siding replaced with asbestos shingles. Most original wood-sash windows replaced, and in some cases resized, with aluminum-sash and vinyl-sash windows. Additionally, the original wood doors have been replaced with non-historic doors.

Of the seven aspects of integrity used to evaluate eligibility for listing in the National Register of Historic Places, Campana found that 10199 West River Street retains acceptable levels of integrity of setting, association and location (the cabins were moved from their original site c.1935, but this is within the period of significance). The remaining four aspects of integrity—materials, design, workmanship, and feeling—have been somewhat diminished by physical modifications to the units. Although this diminished integrity precludes the property's eligibility for individual listing in the NRHP, it is not so diminished to render the property noncontributing to the TNRHD. A majority of the cabins retain enough integrity to discern their historic form, massing and basic design, which allows the property to convey its historical significance as a contributing element of the TNRHD.

Due to modifications that have occurred to the property, Campana found that a more appropriate rating for 10199 West River Street under Truckee's local rating system is Category C ("Supporting"). This rating is given to buildings constructed within the period of significance that have sustained substantial alteration. Despite the degree to which 10199 West River Street has been altered, Campana found that it does not meet the criteria of a Category D ("Nonessential") rating, which entails that the property has "been altered so radically that the historic information is no longer interpretable." While alterations have resulted in the obscuration, loss or destruction of much of the building's historic fabric, the resource is not so altered as to nullify its association with the River Character Area's period of significance

Analysis of Proposed Rehabilitation

The applicant proposes to rehabilitate the seven cabins in compliance with the Secretary of the Interior's Standards for Rehabilitation and the Town of Truckee's Design Guidelines for the River Character Area. Because the property is located within the Historic Preservation Overlay District, all exterior changes are subject to Historic Design Review in compliance with Development Code

Chapter 18.77. Before any work can be completed, a Certificate of Appropriateness (CoA) for the proposed work must be granted. To grant a CoA, all required findings set forth in Development Code Section 18.77.040 must be made. These findings ensure that a project is in conformance with applicable development standards and historic design guidelines, and that the project will not adversely affect historic resources. Campana's report assesses whether the project will pose an adverse effect to 10199 West River Street. Conclusions are based on a comparison of the proposed work with the Town of Truckee's Historic Preservation Design Guidelines (Chapter 18.26) and the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties.

In Campana's professional opinion, the proposed project will not adversely affect the property at 10199 West River Street. The report states that the work conforms with the Town of Truckee's Historic Design Guidelines (Chapter 18.26) and the SOI Standards for Rehabilitation, and concurs with the JRP findings presented in the April 3, 2019 letter. Campana states that the proposed project will augment the historic character of the property by remedying the property's diminished integrity of design, materials, workmanship, and feeling, thereby strengthening its contribution to the district. The proposed work will reverse the impacts of these alterations (e.g., the removal and replacement of non-historic asbestos siding with historically appropriate wood siding, the restoration of historic porches, the replacement of non-historic doors and windows with historically appropriate materials, etc.), thereby strengthening its status as a Category B property. Because the proposed rehabilitation will reinstate much of the property's integrity, the report recommends that a SOI-qualified architectural historian be hired to provide an updated recordation of the cabins using a DPR 523 Form after the rehabilitation work has concluded.

Additionally, Campana found that the rehabilitation work planned for 10199 West River Street would not adversely affect the overall historic character of the district. In fact, it abides by the design goals and policies set forth by the Design Guidelines for the River Character Area. Based on the proposed project tasks, the rehabilitated property-with its restored front porches, realignment of cabin fronts in accordance with the neighborhood's historical setbacks, and use of historically appropriate finishes and materials-will enhance the historic character of the area.

Summary of Recommendations

- The subject property is not individually eligible for listing in the National Register of Historic Places.
- The subject property is recommended as a contributing element of the TNRHD.
- Although the diminished integrity of the subject property suggests that the property embodies the qualities of a Category C ("Supporting") resource in its present state, the proposed rehabilitation will restore the property's status as a Category B ("Contributing") resource.
- The proposed project will not adversely affect the subject property or the River Character Area of the TNRHD.
- The proposed rehabilitation is consistent with the Secretary of the Interior's Standards and the
- Town of Truckee's Historic Design Guidelines.
- After the rehabilitation project is completed, the property should be re-recorded on a DPR 523 form and re-evaluated for inclusion in the NRHP by an SOI-qualified architectural historian. This form should then be forwarded to the California State Historic Preservation Office (SHPO) for inclusion in the California Historic Resources Information System (CHRIS) database.

Impact Discussion

- a) CEQA Guidelines Section 15064.5 requires the lead agency to consider the effects of a proposed project on historical resources. A historical resource is defined as any building, structure, site, or object listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR), or determined by a lead agency to be significant in

the architectural, engineering, scientific, economic, agricultural, educational, social, political, or cultural annals of California.

The CRHR includes resources that have been listed in or formally determined eligible for listing in the National Register of Historic Places (NRHP), as well as some California State Landmarks and Points of Historical Interest. Under U.S. Department of the Interior, National Park Service guidelines (NPS, 1997), buildings, structures, and objects usually need to be more than 50 years old to be eligible for listing in the NRHP. The California Office of Historic Preservation guidelines for project review and planning call for the identification and evaluation of resources that are more than 45 years old to account for the passage of time between the period of project review and project completion. Resources that are less than 50 years old are generally excluded from listing in the NRHP or CRHR, unless they can be shown to be exceptionally significant.

Based on the conclusions contained in the 2019 historic resource evaluation report prepared by Kautz, the proposed project will create no adverse impacts on the existing historic resources or the surrounding River Character Area. **Mitigation Measure 5a** is proposed to require a detailed rehabilitation plan prior to issuance of grading, demolition or building permits for the project to ensure that the proposed project is consistent with the approved plans and that all construction and demolition is monitored by Town staff.

Mitigation Measure 5b is proposed to ensure that any historical or archaeological resources that may be discovered during construction activities will be analyzed by a qualified archaeologist, and any significant effects on significant resources will be mitigated to a less than significant level in accordance with CEQA statutes and guidelines. Both **Mitigation Measure 5b** and Development Code Section 18.30.040 (Archaeological/ Cultural Resources) require that in the event that archaeological or cultural resources are discovered during any construction, all construction activities will cease within 200 feet of the find and the Department shall be notified so that the extent and location of discovered materials may be recorded in a written report by a qualified archaeologist.

To ensure a **less-than-significant** impact, **Mitigation Measure 5a** and **Mitigation Measure 5b** shall be implemented.

- b) CEQA requires the lead agency to consider the effects of a project on archaeological resources and to determine whether any identified archaeological resource is a historical resource. CEQA Guidelines Section 15064.5 also requires consideration of potential project impacts on “unique” archaeological resources that do not qualify as historical resources. Public Resources Code (PRC) Section 21083.2 defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria. The resource:

- (1) Contains information needed to answer important scientific research questions, and there is a demonstrable public interest in that information;
- (2) Has a special and particular quality, such as being the oldest of its type or the best available example of its type; and/or
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

PRC Section 15064.5(c)(4) provides that, if an archaeological resource is neither a unique archaeological resource nor a historical resource, the effects of a project on the resource are not considered significant. Based on the conclusions contained in the historic resource consultant evaluation report prepared by Kautz, the proposed project will create no adverse impacts on the existing historic resources on the project site. If additional resources should be encountered during construction, work would stop until the resource can be evaluated and a determination made of its

significance and need for recovery, avoidance, and/or mitigation. **Mitigation Measure 5b** will reduce potential impacts to **less-than-significant**.

- c) No human remains are known to exist within the project area. In the event that human remains are discovered, work within the area will be stopped and the Nevada County Coroner will be notified immediately. Work will only resume after the investigation and in accordance with any requirements and procedures imposed by the County Coroner. In the event that the bones most likely represent a Native American interment, the Native American Heritage Commission will be notified so that the most likely descendants can be identified and appropriate treatment can be implemented. Therefore, with the incorporation of mitigation measures the proposed project would not result in any significant impacts with respect to disturbing any human remains, including those interred outside of formal cemeteries. **Mitigation Measure 5c** will reduce potential impacts to **less-than-significant**.

Mitigation Measures

- 5a) A detailed rehabilitation plan shall be prepared by the applicant and submitted to the Town of Truckee for review and approval prior to issuance of any grading, demolition or building permits. The plan shall identify how the rehabilitation approach is consistent with the Secretary of Interior's Standards for Rehabilitations, including identifying the steps in the rehabilitation process (exploration of the resource in consultation with Town staff on the results; salvage of materials, working with Town staff to identify and tag materials that will be reused; duplication of any materials that cannot be salvaged, in coordination with Town staff; etc.). A construction mitigation monitoring fee will be required to be submitted by the applicant prior to permit issuance.

- 5b) In the event that previously undiscovered cultural resources are encountered during project construction, all activity within 200 feet of the find shall cease until it can be evaluated by a qualified archaeologist. If the archaeologist determines that the resources may be significant, the archaeologist will notify the Town and will develop an appropriate treatment plan for the resources. Mitigation measures, as recommended by the archaeologist and approved by the Community Development Director in accordance with Appendix K of the CEQA Guidelines, shall be implemented prior to recommencement of construction activity.

The archaeologist shall consult with Native American monitors or other appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. In considering any suggested mitigation proposed by the archaeologist in order to mitigate impacts to cultural resources, the Town will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed on other parts of the project area while mitigation for cultural resources is being carried out.

- 5c) If human skeletal remains are uncovered during project construction, the Town will immediately halt work, contact the Nevada County Coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines.

If the County Coroner determines that the remains are Native American, the project proponent will contact the NAHC, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

These mitigation measures will ensure that archeological resources are identified in the site and that impacts on any important identified resources are eliminated or reduced to a less-than-significant level in accordance with Appendix K of the CEQA Guidelines.

References

Kautz Environmental Consultants, Inc. 2019. Re-evaluation of 10199 West River Street for National Register and Local Historic District Eligibility and Assessment of Proposed Project Effects, Truckee, Nevada County, California.

JRP Historical Consulting, LLC. Historic Resource Compliance for Property at 10199 West River Street, Truckee, Nevada County, California. 2019.

JRP Historical Consulting, LLC. Historic Resource Evaluation for Property at 10199 West River Street, Truckee, Nevada County, California. 2017.

Kautz Environmental Consultants, Inc. 2004. Town of Truckee Historic Resource and Architectural Inventory.

6. ENERGY.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

Setting

The portion of the project site proposed for rehabilitation is developed with seven existing single-family residences. The structures are historic and are believed to have been constructed c. 1935, according to the Town of Truckee Historic Resource and Architectural Inventory. (See Section 5, *Cultural Resources*, for information on the historic resources.) The date of construction means that the residences were constructed before current State requirements related to energy efficiency were in place.

As part of the proposed project, the applicant proposes to rehabilitate the existing residential structures, including the following: install new foundations beneath the structures, replace non-historic asbestos shingles with historically appropriate siding, replace non-historic windows and doors with historically appropriate materials, and install new composition roofing. Rehabilitation principles identified by the applicant to incorporate State and local code compliance include Title 24 Energy compliance, lateral force resistance (wind and earthquake), new plumbing and electrical, and use of energy-efficient windows, water heating and space heating. New porches are proposed to be oriented to provide southern exposure for passive solar access.

Regulatory Setting

California Building Code

The California Building Code is another name for the body of regulations known as the California Code of Regulations, Title 24, Part 2, which is a portion of the California Building Standards Code. Title 24 is assigned to the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under state law, all building standards must be centralized in Title 24 or they are not enforceable. Published by the International Conference of Building Officials, the Uniform Building Code is a widely adopted model building code in the United States. The California Building Code incorporates by reference the Uniform Building Code (UBC) with necessary California amendments.

Title 24, Part 6 of the California Code of Regulations, known as the Building Energy Efficiency Standards, was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. On January 1, 2010, the California Building Standards Commission adopted CALGreen and became the first state in the United States to adopt a statewide green building standards code. CALGreen is a stringent building code that was established for the purpose of reducing greenhouse gas emissions to pre-1990 levels and lowering energy, water consumption and construction waste in efforts to protect California’s fragile environment.

The project proposes to comply with the California Building Standards Code, including Title 24 requirements. The Town of Truckee does not currently have local requirements for energy efficiency.

Impact Discussion

- a) As part of the rehabilitation, the project proposes improvements to the existing residential structures to improve energy efficiency, including use of energy-efficient windows, water heating and space heating and use of passive solar access. The project proposes to comply with the California Building Code, including Title 24 requirements. The proposed project will not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, the project will have a **less-than-significant** impact.
- b) The project proposes to comply with the California Building Code, including Title 24 requirements. The Town of Truckee has no local requirements for energy efficiency. The project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the project will have a **less-than-significant** impact.

Mitigation Measures

None required.

7. GEOLOGY AND SOILS.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the			✓	

State Geologist for the area or based on other substantial evidence of a known fault?				
ii. Strong seismic ground shaking?			✓	
iii. Seismic-related ground failure, including liquefaction?			✓	
iv. Landslides?			✓	
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✓	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems where sewers are not available for the disposal of wastewater?			✓	
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

Setting

The project site lies within the Donner Lake Valley in the Sierra Nevada Mountains. The Sierra Nevada Mountains are generally characterized by exposed Sierra Nevada Batholith bedrock and glacial outwash and till deposits. There are no Alquist-Priolo designated faults in the Town of Truckee, and there are no active faults through or within one mile of the project site.

Regulatory Setting

State Regulations

Alquist-Priolo Geologic Hazards Zone Act

The Alquist-Priolo Earthquake Fault Zoning Act (formerly the Alquist-Priolo Special Studies Zone Act), signed into law December 1972, requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development on or near active fault traces to reduce the hazard of fault rupture and to prohibit the location of most structures for human occupancy across these traces. Cities and counties must regulate certain development projects within the zones, which includes withholding permits until geologic investigations demonstrate that development sites are not threatened by future surface displacement (Hart and Bryant, 1997). Surface fault rupture is not necessarily restricted to the area within an Alquist-Priolo Zone. The project site does not occur within an Alquist-Priolo Fault Rupture Zone.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground-shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones. Before a development permit is granted for a site within a seismic hazard zone, a geotechnical investigation of the site has to be conducted and appropriate mitigation measures incorporated into the project design.

California Building Code

The California Building Code is another name for the body of regulations known as the California Code of Regulations, Title 24, Part 2, which is a portion of the California Building Standards Code. Title 24 is assigned to the California Building Standards Commission, which, by law, is responsible for

coordinating all building standards. Under state law, all building standards must be centralized in Title 24 or they are not enforceable. Published by the International Conference of Building Officials, the Uniform Building Code is a widely adopted model building code in the United States. The California Building Code incorporates by reference the Uniform Building Code (UBC) with necessary California amendments. About one-third of the text within the California Building Code has been tailored for California earthquake conditions.

Impact Discussion

- a-i) The project area is not located within any of the Earthquake Fault Zones delineated by the Alquist-Priolo Earthquake Fault Zoning Act (Hart and Bryant, 1999). The referenced geologic maps show several active and potentially active faults located near the project site, including a group of unnamed faults southeast of Truckee (potentially active, approximately two miles south), the Dog Valley Fault (active, approximately 4.25 miles northwest), and the North Tahoe Fault (active, approximately 12.5 miles southeast). The Sierra Frontal fault zone trends in a general north-south direction approximately 20 miles east of the site and is considered active. Because no development is proposed at this, the project is not expected to expose people to earthquake risk. The Town of Truckee requires structures to be built in accordance with the California Building Code including seismic design parameters. Therefore, the project will have a **less-than-significant** impact.
- a-ii) Ground motion during an earthquake is an unavoidable hazard for facilities in the Sierra Nevada region. The intensity of such an event would depend on the causative fault and the distance to the epicenter, the moment magnitude, and the duration of shaking. Ground-shaking within the project area could cause significant damage to proposed facilities, if not constructed in accordance with California Building Code (CBC) requirements for Seismic Risk Zone 3. The Town of Truckee requires structures to be built in accordance with UBC requirements. Therefore, the project will have a **less-than-significant** impact.
- a-iii) Soil liquefaction is a phenomenon in which loose, saturated, cohesionless soils (silts and sands) below the water table are subject to a temporary, but essentially total loss of strength under the reversing, cyclic-shear strains associated with earthquake shaking. As noted above, the project is not located within a delineated Alquist-Priolo Earthquake Fault Zone. In considering the history of past earthquake activity in the region, the potential for ground lurching, differential settlement or lateral spreading occurring during or following seismic events near the site are considered to be low. Therefore, the project will have a **less-than-significant** impact.
- a-iv) There is no known history of landslide activity within the project site. The possibility of landslides at the subject site is considered low because the structures will not be constructed on steep slopes and because the design of the project will comply with the standards and requirements of the Town of Truckee Development Code as well as CBC building requirements, and all applicable grading permits will be obtained. Therefore, the project will have a **less-than-significant** impact.
- b) Construction of the project will require site preparation which would expose surface soil materials to rainfall and snowmelt, potentially resulting in the removal and transport of these materials to the Truckee River watershed. The project area is subject to the Town NPDES Phase 2 MS4 permit Lahontan Regional Water Quality Control Board (LRWQCB) water quality standards for the Truckee River Hydrologic Unit. Therefore, the project will have a **less-than-significant** impact.
- c) As described above, the proposed project is not located within a delineated Alquist-Priolo Earthquake Fault Zone. Additionally, the probability of soil liquefaction and lateral spreading actually taking place on the project area is considered to be low. The project will be constructed according to all state and Town requirements including CBC building standards to protect the

public and construction personnel from potential geologic hazards. No development is proposed at this time. Therefore, the project will have a **less-than-significant** impact.

- d) The potential for liquefaction, lateral spreading, and slope instability at the site is considered low. Additionally, compliance with all Town and state standards and practices, as well as application of the existing regulations identified in the CBC, would minimize the risk associated with development of a future development project. Therefore, the project will have a **less-than-significant** impact.
- e) The proposed project site will be connected to the town’s sewer system and will be serviced by the Truckee Sanitary District and Tahoe-Truckee Sanitary Agency. Therefore, the project will have a **less-than-significant** impact.
- f) Paleontological resources are the fossilized evidence of past life found in the geologic record. Despite the tremendous volume of sedimentary rock deposits preserved worldwide, preservation of plant or animal remains as fossils is an extremely rare occurrence. Because of the infrequency of fossil preservation, fossils – particularly vertebrate fossils – are considered to be nonrenewable resources. Because of their rarity, and the scientific information they can provide, fossils are considered highly significant records of ancient life. No known paleontological resources or unique geologic features exist within the project area. Therefore, the proposed project is not likely to destroy, either directly or indirectly, a unique paleontological resource or site, or geological feature. No paleontological resources or geological features are known to exist with the project site. **Mitigation Measure 7a** is proposed to address potential impacts to any previously unidentified resource discovered within the site and identifies that if such a resource should be encountered during construction, work would stop until the resource can be evaluated and a determination made of its significance and need for recovery, avoidance, and/or mitigation. Therefore, the proposed project would result in a **less-than-significant** impact on paleontological resources or unique geologic features.

Mitigation Measures

7a) In the event that previously undiscovered paleontological resources or unique geologic features are encountered during project construction, all activity within 200 feet of the find shall cease until it can be evaluated by a qualified archaeologist. If the archaeologist determines that the resources may be significant, the archaeologist will notify the Town and will develop an appropriate treatment plan for the resources. Mitigation measures, as recommended by the archaeologist and approved by the Community Development Director in accordance with Appendix K of the CEQA Guidelines, shall be implemented prior to recommencement of construction activity. In considering any suggested mitigation proposed by the archaeologist in order to mitigate impacts to the resources, the Town will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed on other parts of the project area while mitigation for cultural resources is being carried out.

8. GREENHOUSE GAS EMISSIONS.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Setting

The Northern Sierra Air Quality Management District (NSAQMD) is the local agency for air quality planning with authority over air pollutant sources within Nevada County. The NSAQMD has not yet established significance thresholds for greenhouse gas emissions from project operations. Therefore, emissions are simply quantified, and reported as baseline (unmitigated) and mitigated emissions.

The primary greenhouse gases in the Earth's atmosphere are water vapor, carbon dioxide, methane, nitrous oxide, and ozone. These various gases in the earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. For most nonindustrial development projects, motor vehicles make up the bulk of GHG emissions. The primary greenhouse gases emitted by motor vehicles include carbon dioxide, methane, nitrous oxide, and hydrofluorocarbons (*CARB 2004*).

California Building Energy Efficiency Standards

Title 24, Part 6 of the California Code of Regulations, known as the Building Energy Efficiency Standards, was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. On January 1, 2010, the California Building Standards Commission adopted CALGreen and became the first state in the United States to adopt a statewide green building standards code. CALGreen is a stringent building code that was established for the purpose of reducing greenhouse gas emissions to pre-1990 levels and lowering energy, water consumption and construction waste in efforts to protect California's fragile environment.

To meet GHG emission targets of AB 32, California would need to generate less GHG emissions in the future than current levels. It is recognized, however, that for most projects there is no simple metric available to determine if a single project would substantially increase or decrease overall GHG emission levels or conflict with the goals of AB 32.

Thresholds of significance illustrate the extent of an impact and are a basis from which to apply mitigation measures. Significance thresholds for greenhouse gas emissions resulting from land use development projects have not been established in Nevada County (as previously mentioned, the NSAQMD has not yet established significance thresholds for greenhouse gas emissions from project operations). However, new structures proposed as part of this Project are required to meet current CALGreen Building Codes. This requirement helps to ensure operational GHG emissions over the long term will not conflict with the goals of AB 32.

Calculations of GHG emissions typically focus on CO₂ because it is the most commonly produced GHG in terms of number of sources and volume generated, and because it is among the easiest GHGs to measure. This analysis also assesses N₂O and CH₄ emissions for other primary source categories of emissions (e.g., motor vehicles and energy use associated with long-term operation of the project). All GHGs are factored in and reported as carbon dioxide equivalents (CO₂e). In order to obtain the CO₂e, each individual GHG is multiplied by its global warming potential. It is important to note that while other GHGs, such as hydrofluorocarbons (HFCs), have a higher global warming potential than CO₂, emissions from land use developments like the proposed project are negligible under typical operations.

Impact Discussion

- a) The project site is developed with existing residential structures, and no increase in the number of residential units is proposed. Due to the location, size and scope of the project,

adherence to building codes, and project design, the project is not anticipated to result in a significant impact on the environment. The project will result in **less-than-significant** impacts.

- b) All construction related to this project is required to meet current building codes, which are intended to substantially reduce GHG emissions. The project does not conflict with any applicable plans, policies or regulations intended to reduce GHG emissions. The project will result in **less-than-significant** impacts.

Mitigation Measures

None required.

9. HAZARDS AND HAZARDOUS MATERIALS.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		✓		
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✓		
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d. Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, would it create a significant hazard to the public or the environment?				✓
e. For a project located within the Truckee-Tahoe Airport Land Use Plan, result in a safety hazard or excessive noise for people residing or working in the project area?		✓		
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			✓	

Setting

Hazardous Materials

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous waste is any hazardous material that is discarded, abandoned, or to be recycled. The criteria that render a material hazardous also apply to wastes that are determined to be hazardous. Factors that influence the health effects of exposure to hazardous material include the dose to which the person is exposed, the frequency of exposure, the exposure pathway, and individual susceptibility.

The site has not been identified as a hazardous material site and is not located near any identified hazardous material sites. The Nevada County Environmental Health Department (NCEHD) requires that for projects involving historic structures undergoing demolition, relocation or remodeling, a lead and Asbestos survey, performed by certified individuals, must be completed on each structure and submitted to NCEHD for review.

The site's zoning allows a range of commercial and residential uses. Any future uses that propose to store or use hazardous material will be reviewed by the NCEHD for Hazardous Materials Storage/Hazardous Waste Generator. The site is located within Compatibility Zone D of the 2004 Truckee Tahoe Airport Land Use Compatibility Plan adopted by the Foothill Airport Land Use Commission.

Wildland Fires

The entire Truckee area is considered to be in a high fire hazard severity zone, as defined by the California Department of Forestry (CDF), although risks are particularly pronounced in certain parts of the community, particularly where homes are located within areas of dense vegetation and forest land, and where steep slopes and other similar conditions exist. Calculation of threat from wildfire hazard is based on a number of combining factors including fuel loading (vegetation), topography, and climatic conditions such as winds, humidity and temperature. According to the Town of Truckee 2025 General Plan, the project area is in a "Very High Risk" area for Community Threat from Wildland Fire. The project site is surrounded by developed single-family residential and industrial properties with some vegetation, trees, shrubs, and landscaping.

Impact Discussion

- a-b) The Nevada County Environmental Health Department (NCEHD) reviewed the proposed project and identified that a lead and asbestos survey, performed by certified individuals, must be completed for each structure proposed for demolition, remodeling or relocation. Additionally, a water source that meets all NCEHD requirements is required. Any existing septic systems need to be documented and a permit for abandonment applied for with NCEHD. Per County of Nevada On-site Wastewater Treatment Systems (A-018, E) ordinance, the location of the proposed lots requires that the lots pursue connection to the Sanitation District that serves this location. If the public sewer connection cannot be legally or physically achieved only then may an On-site Wastewater Treatment system be pursued. **Mitigation Measures 9a** and **9b** will reduce potential impacts to **less-than-significant**.
- c) The project will not transport, use or dispose of large amounts of hazardous materials and accordingly, there is no risk from the release of hazardous materials into the environment. No schools are located within one-quarter mile of the project site. There is **no impact**.
- d) The project area is not currently identified on the California Hazardous Wastes and Substances List. There is **no impact**.
- e) The project site is located in the Truckee Tahoe Airport Land Use Compatibility Plan Zone D. Section 18.64.050(D) (Implementation of Airport Safety Policies) of the Development Code requires all uses and structures in airport safety zones to be compatible with all applicable provisions of the 2004 Truckee Tahoe Airport Land Use Compatibility Plan. Compatibility Zone D prohibits highly noise-sensitive uses and hazards to flight. Maximum densities or intensities set forth by the plan include a maximum average of 150 people per acre and 600 people in a single acre. Ten percent open space is required. Airspace review is required for objects over 100 feet tall. Overflight easements are required. Sensitive uses (including children's homes, hospitals and nursing homes) are discouraged. Compatibility with all requirements of the Airport Land Use Compatibility Plan is required. The Nevada County Transportation Commission (NCTC) identified that the project meets the criteria of a "Major Land Use" and that payment of a review fee is required to NCTC's review. **Mitigation Measure 9c** will reduce potential impact to **less-than-significant**.
- f) The project will not cause any interference with an emergency response plan or emergency evacuation plan. There is **no impact**.

- g) The project site is developed with existing residential structures. No increase in the number of residential dwelling units is proposed, and no expansion or intensification of the current use is proposed. Based on existing conditions, the proposed project will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, the impact is **less-than-significant**.

Mitigation Measures

- 9a) Prior to issuance of grading, demolition or grading permits, a lead and asbestos survey, performed by certified individuals, must be completed for each structure proposed for demolition, remodeling or relocation and submitted to Nevada County Environmental Health Department (NCEHD) for review.
- 9b) Prior to issuance of grading, demolition or grading permits, a water source that meets all NCEHD requirements is required. Any existing septic systems need to be documented and a permit for abandonment applied for with NCEHD. Per County of Nevada On-site Wastewater Treatment Systems (A-018, E) ordinance, the location of the proposed lots requires that the lots pursue connection to the Sanitation District that serves this location. If the public sewer connection cannot be legally or physically achieved only then may an On-site Wastewater Treatment system be pursued.
- 9c) The project is required to be compatible with all applicable provisions of the 2004 Truckee Tahoe Airport Land Use Compatibility Plan. The project site is located within Truckee Tahoe Land Use Compatibility Zone D and meets the criteria of a “Major Land Use.” Prior to issuance of any grading, demolition or building permit, review of the proposed project by the Nevada County Transportation Commission (NCTC) is required. A review fee of \$150 is required to be paid by the applicant to NCTC and recording of an Overflight Notification is required.

References

Department of Toxic Substances Control). Hazardous Waste and Substances Site List. Available at: http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES%2COPEN%2CFUDS%2CCLOSE&status=ACT%2CBKLG%2CCOM&reporttitle=HAZARDOUS%20WASTE%20AND%20SUBSTANCES%20SITE%20LIST

10. HYDROLOGY AND WATER QUALITY.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		✓		
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site?		✓		
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		✓		
iii. create or contribute runoff water which would exceed the capacity of		✓		

existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?				
iv. impede or redirect flows?		✓		
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		✓		

Setting

The project site is developed with existing residential structures and is surrounded by residential and industrial development. The Truckee River is located approximately 100 feet to the south of the project site. The site slopes slightly from north to south toward Riverside Drive and has minimal vegetation. An existing storm water drain is located between two of the parcels within the Tentative Map area that are developed with existing single-family residences (APNs 019-130-050-000 and 019-130-051-000). There are no known wetlands, waters of the United States, or seasonal tributaries located on the site. The site is identified by FEMA as an area of minimal flood hazard.

Regulatory Setting

The Porter-Cologne Water Quality Control Act allows the California State Water Resources Control Board (SWRCB) to adopt statewide water quality control plans or basin plans. The purpose of the plans is to establish water quality objectives for specific water bodies. The Lahontan Region Water Quality Control Board (LRWQCB), one of nine regional water boards, has prepared the Water Quality Control Plan for the Lahontan Region (Basin Plan) that establishes water quality objectives and implementation programs to meet the stated objectives and to protect the beneficial uses of the Truckee River basin waters. Most of the implementation of SWRCB’s responsibilities is delegated to the nine regional boards and the LRWQCB regulates storm water runoff in the project area. For projects disturbing one acre or more of surface area, the project applicant is required to obtain a Stormwater Pollution Prevention Plan (SWPPP) and Waste Discharge Identification number from the Regional Water Quality Control Board.

Town of Truckee Development Code

Development Code Section 18.30.050 (Drainage and Stormwater Runoff) requires all applications for a Zoning Clearance, Development Permit, Minor Use Permit or Use Permit to be designed and constructed to provide facilities for the proper conveyance, treatment and disposal of storm water. Submittal and approval of a drainage and erosion control plan is required. Surface runoff treatment measures and erosion control measures consistent with the Regional Water Quality Control Board’s Truckee River Hydrologic Unit Project Guidelines for Erosion Control, the Town of Truckee Stormwater Management Program Guidelines and the “California Stormwater Best Management Practices Handbooks,” prepared by the California Stormwater Quality Association, are required to be incorporated into the project.

Development within the Town must also comply with the most current Phase 2 Municipal Separate Storm Sewer System (MS4) Permit, as regulated by the State Water Resources Control Board.

Impact Discussion

- a) Project construction would involve activities such as excavation and soil stockpiling that would generate loose, erodible soils that, if not properly managed, could cause sedimentation. This could cause an adverse water quality impact. To minimize construction related water quality impacts, the applicants will be required to submit grading, erosion control and improvement plans designed to ensure erosion control impacts are minimized. The construction contractor will be

required to protect surface water quality by preventing eroded material or contaminants from entering waterways during construction through the use of best management practices (BMPs). The project must comply with the Town's drainage and storm water runoff regulations as specified in Section 18.30.050 of the Development Code, including ensuring that the project will not impact the nearby wetlands, and storm water runoff treatment and erosion control measures are consistent with the LRWQCB's guidelines. Conformance with these water quality standards in addition to **Mitigation Measures 9a and 9b** will reduce water quality impacts to a **less-than-significant** level and ensure that the project will not generate substantial additional sources of polluted runoff during construction.

- b) The project will not directly withdraw water from the local groundwater supply, and thus it is not likely to deplete groundwater supplies or interfere substantially with groundwater recharge. There is **no impact** to the local groundwater table.
- c-i) Project construction would involve activities such as excavation and soil stockpiling that would generate loose, erodible soils. Development Code Section 18.30.050 and the Town-required grading and storm water runoff plans ensure that storm water drainage is accommodated onsite and not impacting adjacent properties, nor are drainage patterns being altered. Conformance with these requirements and incorporation of **Mitigation Measures 9a and 9b** would result in a **less-than-significant** impact.
- c-ii) Construction of the project could alter the existing drainage patterns of the site or area and could increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Development Code Section 18.30.050 and the Town-required grading and storm water runoff plans ensure that storm water drainage is accommodated on site and not impacting adjacent properties. Incorporation of these recommendations and **Mitigation Measures 9a and 9b** would result in a **less-than-significant** impact.
- c-iii) Development Code Section 18.30.050 and the Town-required grading and storm water runoff plans ensure that storm water drainage is accommodated on site and not impacting adjacent properties or overwhelming the storm water drainage system. Any runoff from the new improvements is not likely to exceed the capacity of existing or planned storm water drainage systems because of the requirements in the Town's drainage and storm water runoff regulations. **Mitigation Measures 9a and 9b** would minimize the potential for substantial additional sources of polluted runoff, resulting in a **less-than-significant** impact.
- c-iv) The project must comply with the Town's drainage and storm water runoff regulations. Storm water runoff treatment and erosion control measures will be consistent with the LRWQCB's guidelines. Conformance with these water quality standards in addition to **Mitigation Measures 9a and 9b** will reduce water quality impacts to a **less-than-significant** level and ensure that the project will not substantially degrade water quality.
- d) The project site is not located in a flood hazard, tsunami, or seiche zone. Therefore, there is **no impact**.
- e) The project must comply with the Town's drainage and storm water runoff regulations as specified in Section 18.30.050 of the Development Code, including ensuring that the project will not impact nearby wetlands, and storm water runoff treatment and erosion control measures are consistent with the LRWQCB's guidelines. The project does not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Incorporation of **Mitigation Measures 9a and 9b** would result in a **less-than-significant** impact.

Mitigation Measures

- 9a) Preparation of grading, erosion control and improvement plans are required to address construction related water quality impacts. These plans shall be prepared in accordance with Town

of Truckee Development Code Section 18.30.050. The requirements set forth within this Section and within the grading, erosion control and improvement plans shall be implemented throughout the entire construction process.

- 9b) A final drainage study shall be prepared by a licensed engineer in accordance with the requirements of the Town Engineer. No disturbance shall occur on the site and no grading or building permits shall be issued for the project until the study is submitted to and approved by the Town Engineer. The study shall analyze if the existing drainage facilities have sufficient capacity to accommodate the increased storm water runoff from the project site. If the drainage facilities do not have sufficient capacity, the drainage study shall identify drainage improvements (both onsite and offsite) to decrease the amount of storm water runoff. The study shall conclude that the project's storm water runoff will not result in flooding impacts and that there will be no net increase in the release of runoff from the site. All improvements required by the drainage plan shall be installed in accordance with the Town Engineer's requirements prior to temporary occupancy of any buildings or any final map recordation.

References

Federal Emergency Management Agency. 2010. FEMA National Flood Hazard Layer (Official). Accessed online at <http://fema.maps.arcgis.com/home/webmap/viewer.html?webmap=cbe088e7c8704464aa0fc34eb99e7f30&extent=-120.51558542578078,39.24031086258598,-119.8509125742192,39.4155874602651>. Accessed on February 5, 2018.

Western Regional Climate Center. 2016. Truckee Ranger Station (049043) Period of Record Monthly Climate Summary. Accessed online at <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca9043> Accessed on February 5, 2018.

11. LAND USE AND PLANNING	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✓

Setting

General Plan and Zoning Consistency:

The project site is located in the Downtown Specific Plan Area (DSPA) General Plan Land Use Designation. The DSPA land use designation applies to an approximately one-square-mile area encompassing Truckee's historic core, which is the subject of ongoing special study and planning. The Specific Plan Area will ultimately contain approximately 650,000 square feet of nonresidential uses including commercial, office, recreational and industrial uses, and approximately 90 lodging units. The average residential density will not exceed 10 dwelling units per acre.

In keeping with the General Plan land use designation above, project site is also located within the "DMU" (Downtown Mixed Use) zoning district. The Development Code requires the parcel to be developed/used in compliance with the requirements of the applicable zoning district. The DMU zoning district applies to areas appropriate to areas in the Downtown Study Area appropriate for a

combination of retail sales, offices, services, lodging and residential land uses. The development standards and permit requirements of the DMU district are intended to create a pedestrian-oriented mixed-use environment. There is no maximum floor area ratio. The maximum density for residential development is 24 dwelling units per acre.

The following table shows the surrounding land uses, designations, and zoning districts:

Direction	General Plan	Zoning	Existing Use
North	• DSPA	• DC (Downtown Commercial)	• Industrial uses; railroad
East	• DSPA	DC (Downtown Commercial)	• Single-family residential
South	• DSPA	• DRM-14 (Downtown medium density residential, 14 dwelling units/acre)	• Single-family residential
West	• DSPA	• DC (Downtown Commercial)	• Vacant; former location of Nevada County Corp Yard

Impact Discussion

- a) The project would not block existing access within a community. The project proposes the dedication of private property to facilitate the construction of pedestrian sidewalks adjacent to the project site and correct existing encroachments of private development into the public right-of-way. The pedestrian access will enhance neighborhood connectivity, as encouraged by General Plan Circulation Element Goal CIR-4 and Community Character Element Policy P5.5. There is **no impact**.
- b) The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. There is **no impact**.

Mitigation Measures

None required.

12. MINERAL RESOURCES.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

Environmental Setting

The site does not contain any mineral resources of any importance or significance to the Town or the State (Town of Truckee General Plan, Figure COS-1, 2006), and there is no evidence of previous aggregate mining on the site.

Impact Discussion

a-b) The site is not an important mineral resources area because of its topography, geologic conditions and proximity to existing developed areas. The site is developed with existing residential uses. Due to the existing development on the site, the project will not result in the loss of significant mineral resources. There is **no impact**.

Mitigation Measures

None required.

13. NOISE.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the Truckee General Plan or Development Code, or applicable standards of other agencies?		✓		
b. Generation of excessive groundborne vibration or groundborne noise levels?			✓	
e. For a project located within the vicinity of a private airstrip or the Truckee-Tahoe Airport Land Use Plan, would the project expose people residing or working in the project area to excessive noise levels?				✓

Setting

The project site is located at the corner of West River Street and Mill Street in Downtown Truckee. Land uses that may be impacted by noises from this project site include single-family residences to the east and south and industrial uses to the north. Noise sources potentially impacting the proposed project include roadway traffic along West River Street to the north, Mill Street to the west and Riverside Drive to the south. In addition, railroad tracks are located approximately 150 feet to the north of the project site. During preparation of the 2025 General Plan, noise levels were measured and calculated using a computer model. The noise model predicts hourly average noise levels using peak hour traffic volumes. The Community Noise Equivalent Level (CNEL) for each roadway was estimated using the relationships of the peak hour noise level to the CNEL actually measured. Future noise contours at 2025 are projected to be 60-70 CNEL dBA through the project site along Brockway Road.

The noise compatibility matrix shown in General Plan Noise Element Figure N-3 established the compatibility guidelines of exterior ground transportation noise (excluding airport noise) for various land uses in Truckee, and provides definitions of compatibility standards. Compatibility standards for exterior airport noise are found in the most recently adopted CLUP. The matrix is used as a guideline by the Town to achieve long-term noise compatibility for land uses.

General Plan Noise Element Figure N-3 (Noise Compatibility Guidelines) established compatible exterior noise levels for commercial, office, mixed-use, and residential uses. Office and commercial uses are normally acceptable in exterior areas with noise levels up to 70 CNEL, conditionally acceptable from 70 to 75 CNEL, normally unacceptable from 75-80, and clearly unacceptable above 80 CNEL. Residential uses in mixed use developments are normally acceptable in exterior noise levels up to 65 CNEL, conditionally acceptable in exterior noise levels from 65 to 70 CNEL, normally unacceptable in exterior noise levels from 70-75, and clearly unacceptable in exterior noise levels

above 75 CNEL. Stand-alone residential uses are normally acceptable in exterior areas with noise levels up to 60 CNEL, conditionally acceptable from 60 to 65 CNEL, normally unacceptable from 65-75, and clearly unacceptable above 75 CNEL. The California Building Code also specifies that multi-family residential buildings or structures located within exterior CNEL contours of 60 dBA or greater of sources, such as a freeway or major street, shall require an acoustical analysis showing that the building has been designed to limit intruding noise to an interior CNEL of 45 dBA.

The Truckee-Tahoe Airport is a general aviation airport located east of Highway 267, south of Truckee. The primary flight paths follow the highways in the area (Interstate 80, Highway 89 and Highway 267); however, the Truckee-Tahoe Airport District does not have the power to regulate the flight paths chosen by individual pilots using the airport. Instead, the District relies on the Airport Land Use Compatibility Plan and local land use regulations to control sensitive land use in areas identified as being exposed to aircraft noise. The Airport Compatibility Plan includes noise contours associated with aircraft operations that are intended to be used to avoid locating noise-sensitive uses in areas of Truckee that are affected by aircraft operations. According to the Airport Compatibility Plan, the project is not located within the existing or future noise impact contours. Based on the findings of the Airport Compatibility Plan, people residing or working on the sites will not be exposed to excessive noise levels from existing and future operations of the airport.

The project site is developed with existing residential uses. The residential structures are proposed to be rehabilitated and relocated within the project area. No expansion or intensification of the existing uses is proposed; as a result, no new land uses are proposed that would require analysis to determine that the use in the “normally acceptable” exterior noise exposure levels, as described in the environmental setting above.

Impact Discussion

a) *Construction*

The proposed project area is located adjacent to and in close proximity to sensitive receptors which include residential properties. These residences would be exposed to noise from the short-term construction of the proposed project. The Town of Truckee provides an exemption to construction noise provided the activities do not take place before 7:00 am or after 9:00 pm on any day except Sunday, or before 9:00 am or after 6:00 pm on Sunday. To further reduce noise impacts and comply with exempted construction hours, **Mitigation Measure 13a** through **13d** shall be incorporated into the project.

Operations

The Town of Truckee General Plan Noise Element outlines guidelines for noise and land use compatibility for development and planning purposes. The adopted Noise Element includes local guidelines based, in part, on the community noise compatibility guidelines established by the California Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels.

For Residential in Mixed Use Development, the guidelines are as follows:

- An exterior noise level less than 65 A-weighted decibel (dBA) community noise exposure level (CNEL) is normally acceptable;
- An exterior noise level between 65 and 70 dBA CNEL is conditionally acceptable;
- An exterior noise level between 70 and 75 dBA CNEL is normally unacceptable; and
- An exterior noise level greater than 75 dBA CNEL is considered clearly unacceptable.

No new residential uses are proposed with the project. Therefore, operational noise impacts are not applicable to the proposed project.

- b) Vibration impacts are typically associated with certain types of construction methods, including pile driving. Sensitive receptors in the project vicinity would be exposed to vibration levels from varied construction impacts. Due to the Town’s exemption to construction activities and noise, this impact is **less-than-significant**.
- c) Truckee Tahoe Airport Land Use Compatibility Plan Policy 4.1.1 states that the maximum CNEL considered normally acceptable for new residential lands uses in the vicinity of Truckee Tahoe Airport is 60 dB. However, no new residential uses are proposed by the project. There is **no impact**.

Mitigation Measures

- 13a) The Town shall require the construction contractor to limit construction activities to between the Town of Truckee noise exempted hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday; no construction shall occur on Sundays. Improvements, grading, and building plans shall note these limited hours of construction.
- 13b) All internal combustion engine driven equipment shall be equipped with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- 13c) Stationary noise generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction area.
- 13d) Utilize “quiet” air compressors and other stationary noise generating equipment where appropriate technology exists.

References

Town of Truckee, 2025 General Plan, Amended January 12, 2017.

Town of Truckee, Development Code, Amended January 11, 2019.

Truckee Tahoe Airport Land Use Compatibility Plan, October 27, 2016.

14. POPULATION AND HOUSING.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

Impact Discussion

- a-b) No displacement of existing housing or people is proposed with this project. The rehabilitation of the existing residential structures on the project site will ensure that the dwelling units

continue to be available for housing. No additional dwelling units are proposed; therefore, no substantial unplanned growth will result. With the current project proposal, there is **no impact**.

Mitigation Measures

None required.

15. PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?				✓
ii. Police protection?				✓
iii. Schools?				✓
iv. Parks?				✓
v. Other public facilities?				✓

Impact Discussion

- a-i) The project site and surrounding area currently receive structural fire protection from the Truckee Fire Protection District. The rehabilitation of the existing residential structures will not require additional fire service to the project site. The Truckee Fire Protection District will review building permits for the proposed project and will identify any new infrastructure required, such as installation of an approved automatic fire sprinkler system. The project will have to comply with the Fire District ordinances regarding wildland fire protection and access. Under the current project proposal, there is **no impact**.
- a-ii) Law enforcement services are the responsibility of the Town of Truckee Police Department. No increase in residents is proposed; therefore, there is no increased need for additional law enforcement services. Under the current project proposal, there is **no impact**.
- a-iii) The proposed project will not generate additional residential population. There is **no impact**.
- a-iv) See the Recreation section below.
- a-v) Other public services, including but not limited to snow removal, road maintenance and other governmental services, will not be impacted by the proposed project. There is **no impact**.

Mitigation Measures

None required.

16. RECREATION.	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact

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

Setting

Local recreational services are provided by the Truckee Donner Recreation and Parks District. Within a half-mile of the project site are several public recreation facilities, including the Truckee River Regional Park and the Truckee River Legacy Trail.

Impact Discussion

a-b) The proposed project will not create additional recreational users, does not include recreational facilities, and will not require the construction or expansion of recreational facilities. There is **no impact**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
17. TRANSPORTATION				
Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				✓
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				✓
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
d. Result in inadequate emergency access?				✓

Setting

The project site is developed with existing residential units. No expansion or intensification of the existing use is proposed. As part of the Tentative Map approval, the application includes a proposal to relinquish interest and/or dedicate approximately 22% of its land area or 2,032 SF along Riverside Dr. and West River St. to allow for public safety improvements and public sidewalks. Through the Tentative Map/Final map process, an additional 697 SF of private land will be dedicated to the Town. The resultant proposed site is approximately 10,065 SF. The relocation of the buildings and the private land dedication will help to achieve the Community’s vision of a livable-walkable Historic District:

- By increasing the setback from the edge of traveled way to create space for curb/gutter, sidewalk and snow storage
- By creating sufficient on-site parking for contemporary residential land use

- By creating a public ROW for future drainage and roadway improvements

Impact Discussion

- a) The project does not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. There is **no impact**.
- b) Due to the fact that no increase in residential units is proposed, an increase in traffic is not anticipated as a result of the proposed project. In addition, the streetscape improvements proposed along the project frontage will increase walkability of the area, which will potentially reduce Vehicle Miles of Travel (VMT) overall. The Town does not have a VMT threshold to evaluate the project against. Construction-related activities resulting from the project would result in short-term temporary increases in traffic volumes (a combination of construction worker vehicles and trucks). Traffic volume levels on area roadways during project construction would vary depending on the particular type and duration of activities. Construction activities will involve ground clearing, grading, and relocation and rehabilitation of the historic residences. Construction-generated traffic would be temporary and would not result in any significant degradation in operating conditions on any project roadways. The project site is located within Downtown Truckee, within a quarter-mile of a major transit stops. There is **no impact**.
- c) The project will not substantially increase hazards due to a geometric design feature or incompatible uses. There is **no impact**.
- d) The project does not alter the existing emergency access to the project area. There is **no impact**.

Mitigation Measures

None required.

18. TRIBAL AND CULTURAL RESOURCES	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or		✓		
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American Tribe.		✓		

Setting

Assembly Bill 52 created a new category of environmental resources that must be considered under the California Environmental Quality Act. The legislation imposed requirements for consultation regarding projects that may affect a tribal cultural resource. Lead agencies are required to provide

notice to tribes that are traditionally and culturally affiliated with the geographic range of the proposed project if they have requested notice of projects within that area. In accordance with the requirements of AB 52, Town staff provided notice that the West River Cottages project had been deemed complete for processing, pursuant to PRC § 21080.3.1(d). Two requests for consultation were received in response to the above-mentioned notice (the Shingle Springs Band of Miwok Indians and United Auburn Indian Community).

Impact Discussion

ai-ii) No tribal cultural resources have been identified within the project site. However, other sites within the area of the project site have previously been identified as locations where tribal cultural resources could potentially be found. **Mitigation Measure 18a** is proposed to address potential impacts to any previously unidentified resource discovered within the site and identifies that if such a resource should be encountered during construction, work would stop until the resource can be evaluated and a determination made of its significance and need for recovery, avoidance, and/or mitigation. Therefore, the proposed project would result in a **less-than-significant** impact on tribal cultural resources.

Mitigation Measures

18a) In the event that previously undiscovered tribal cultural resources are encountered during project construction, all activity within 200 feet of the find shall cease until it can be evaluated by a qualified archaeologist. If the archaeologist determines that the resources may be significant, the archaeologist will notify the Town and will develop an appropriate treatment plan for the resources. Mitigation measures, as recommended by the archaeologist and approved by the Community Development Director in accordance with Appendix K of the CEQA Guidelines, shall be implemented prior to recommencement of construction activity.

The archaeologist shall consult with Native American monitors or other appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. In considering any suggested mitigation proposed by the archaeologist in order to mitigate impacts to cultural resources, the Town will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed on other parts of the project area while mitigation for cultural resources is being carried out.

19. UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation nor construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				✓
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				✓
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✓

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
g. Comply with Federal, State and local management and reduction statutes and regulations related to solid waste?				✓

Impact Discussion

- a-c) The project would not require the relocation or construction any water or wastewater treatment facilities. The project is proposed to be served by the municipal sewer system and no expansion of the system will be required to serve the project. The project may result in the undergrounding of overhead utilities (electric, phone, and/or cable), but the undergrounding will not result in significant environmental effects. Therefore, there is **no impact**.
- d) No increase in the number of existing dwelling units nor expansion/intensification of the existing use is proposed. There will be no increase in trash generated as a result from the construction of the project and from the operation of the residential use. The applicant is required to comply with the California Solid Waste Reuse and Recycling Access Act (Public Resources Code Section 42900 through 42911) and Development Code Section 18.30.150 (Solid Waste/Recyclable Materials Storage) which requires storage areas for solid waste and recycling. The applicant is proposing seven bear boxes to accommodate residential waste and recycling for each dwelling unit. Additionally, the local landfill has adequate capacity for the solid waste generated by the project. Since the volume of trash can be accommodated by the local landfill, this impact is **less than significant**.
- e) The project is required to comply with federal, state, and local statutes and regulations related to solid waste. There is **no impact**.

Mitigation Measures

None required.

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

Impact Discussion

- a-d) No expansion or intensification in the existing use of the project site is proposed, including the number of existing dwelling units. Therefore, there is **no impact**.

Mitigation Measures

None required.

MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		✓		
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		✓		

The determinations of the mandatory findings of significance are supported by the discussion contained within the Initial Study. The Initial Study identifies potentially significant effects on the environment; however, revisions have been made to the project to eliminate or reduce these environmental effects to a less-than-significant level. There is no substantial evidence that the project, upon incorporation of the mitigation measures, may have a significant effect on the environment.

Impact Discussion

- a) This Draft Initial Study/Mitigated Negative Declaration found that the proposed project and associated activities will potentially impact the environment in the areas of biological resources, cultural resources, geology/soils, hazards/hazardous materials, hydrology and water quality, noise and tribal cultural resources. However, these potential impacts will be reduced to a less-than-significant level with implementation of the mitigation measures included in this report. Therefore, the project will have a **less-than-significant** impact on the environment.
- b) This Draft Initial Study/Mitigated Negative Declaration found that the proposed project and associated activities will potentially impact the environment in the areas of biological resources, cultural resources, geology/soils, hazards/hazardous materials, hydrology and water quality, noise and tribal cultural resources. However, these potential impacts will be reduced to a less-than-significant level with implementation of the mitigation measures included in this report.

Other future projects proposed in the region and vicinity may increase impacts identified herein or this project may contribute to other impacts; however, this project is not anticipated to contribute substantially to any one impact, and the proposed project’s impacts are not anticipated to be cumulatively considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of future projects, resulting in a

less-than-significant impact with implementation of the mitigation measures included in this document.

- c) The project will not result in any substantial adverse effects to human beings, either directly or indirectly, since each potentially significant impact can be reduced to a less-than-significant level with the implementation of the mitigation measures provided in this document. No other substantial adverse effects to human beings are anticipated as a result of this project, resulting in a **less-than-significant** impact.

DETERMINATION

On the basis of this initial evaluation, the Community Development Director finds:

The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

Although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

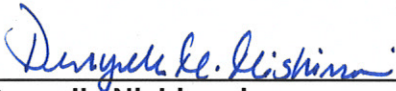
The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Initial Study Prepared By: Town of Truckee Planning Division
10183 Truckee Airport Road
Truckee, CA 96161

Date Prepared: September 5, 2019

Initial Study Approved By:



Denyelle Nishimori
Community Development Director

9.5.19

Date

Attachments:
A. Appendices