

To: Danyelle Nishimori, Senior Planner  
Town of Truckee

From: Pamela Stock, Glenshire resident

Re: Canyon Springs DEIR comments

I have some comments on traffic and biological impacts first, and then the majority of my comments have to do with water quality. This letter supersedes my previous e-mail concerning the DEIR, as I have now read the DEIR and included the appropriate references.

Traffic:

1. The Town of Truckee mandates a D LOS which is a maximum 25 to 35 second delay for a vehicle wait before proceeding through an intersection. The Donner Pass Road and Glenshire Drive intersection already exceeds this standard per the DEIR survey. The mitigation recommended (4.14-70) is to construct a second left hand turn lane to be used by vehicles wanting to turn left onto DPR from Glenshire Drive. This is not a mitigation that works, as vehicles coming down DPR to turn left onto Glenshire Drive would stop any Glenshire Drive vehicles turning left onto DPR, as would vehicles coming up DPR to the roundabouts. Therefore two left turn lanes do not increase the flow of Glenshire Drive traffic. How will this be mitigated appropriately?

2. 4.14-71 of the DEIR states that construction traffic would "exacerbate deficient intersections," but finds that the impact is "less than significant." How is this possible? Large trucks would significantly impact safety and impose longer delays at intersections because it takes a much longer space between traffic to enable a large truck to turn left (or right) from Glenshire Road. How will this be re-addressed?

3. 4.14-72 of the DEIR states that Glenshire Drive east of Martis Peak road is only 11 feet wide and Town restrictions mandate 12 feet. Therefore a safety study must be made. Who does this study and mitigates Glenshire Drive to meet Town standards? Are the Canyon Springs developers responsible for this and not the Town residents and if not, why not?

4. During the DEIR presentation of 1/29/13 it was said that "most drivers (leaving Glenshire via I-80) "will find I-80 to be more convenient than Glenshire Drive, except for trips to/from downtown Truckee." This means that drivers will have to go through the Ag Station on every trip to Town or use the Glenshire Drive/DPR intersection, which, as we know, already exceeds Town standards for LOS. How will this be re-addressed?

Biological Resources:

1. 4.4-43 of the DEIR states that housing lots are required to have a 50 foot setback from any 100 year flood zone. There are currently 10 lots (#122-131) that have a less than 50 foot setback. Why would the Town make this exception? How will said lots be made to be in compliance with the Town requirements?

2. There are 8 lots designated as affordable housing units. DEIR, page 3-17, states that the multi family lots can contain 2, 3, or 4 units per lot. Per Jaime La Chance, the exact number has not been determined. Potentially, this could significantly impact many aspects of the project. Have these lots/residents been included in the DEIR impacts and mitigations? I can find no reference to it and request that the maximum number of residents be included in all DEIR reports on traffic/transportation, hydrology and water quality, biological resources, air quality, etc

3. 4.4-46 of the DEIR states that tree snag removal could result in loss of bat roosts. However, the DEIR conclusion is that this would be "less than significant" due to the decrease impact the project would have on the meadow and "sagebrush" (which is incorrectly identified and is really bitter brush, a significant source of deer food). What evidence is used that bats, when confined to much smaller spaces, will not be impacted?

#### Hydrology and Water Quality:

1. The DEIR water survey was done in August/September, a time of year when there is little (due to springs) or no water runoff. The survey must therefore have made assumptions about water runoff, as it could not be observed. The water survey needs to be redone using AVERAGE rain/snowfall totals over several years and observed in actual runoff seasons. Currently the DEIR used rain totals from 1976 and 1996 and snowfall totals from 1952. Since there is climate change occurring, this needs updating. How will this be corrected?

2. 4.9-6 of the DEIR lists post construction storm water standards, but because the DEIR survey was not done in the spring when water runoff is highest, the assessment makes assumptions such as, "likely from....." (see 4.9-14). How will this be redone?

3. Erosion control sections states that there can be no land disturbance without first having the project submit a storm water management and sediment control plan to an implementing agency. Lahontan regulates water quality in the Canyon Springs area--have they permitted the storm water runoff plan?

4. Canyon Springs may require a permit from ACOE, section 404 of the Clean Water Act AND water certification from the Lahontan RWQCB (section 401 of the CWA)--has this been investigated and done if required?

5. Under the Clean Water Act of 1972 (33 U.S.C. 1251 et seq 1972), a ground water permit/program is necessary to protect ground water, including rainwater discharge of pollutants and including storm runoff of sediment. Truckee and surrounding areas are subject to convection cell thunderstorms in the summer. On August 16, 2012, the east end of Glenshire experienced a 2 hour plus storm that resulted in significant flooding to Wiltshire Drive and Lance Drive residences, and the complete failure of the water runoff ditch between the Elkhorn Ridge properties and the afore mentioned properties. This storm far exceeded the DEIR estimation of the 100 year flood expectation of .7 inches in one hour. Will the DEIR address these kinds of storms, and if not, why not?

6. The damage done from the 8/16/2012 storm was evaluated by the Town engineers and residents were told that the runoff ditch between Elkhorn Ridge and Glenshire residents would not be repaired by the Town because there is a Town regulation that until a project is 50 to 65% built out, the Town does not assume responsibility. This is to ensure that the Town receives enough tax money to pay for repairs. I cannot find any reference to this rule in the DEIR for Canyon Springs. The EIR and Town of Truckee must require a bond on the Canyon Springs owners and developers for the ongoing maintenance and repair of any water water runoff damage until the project is 50 to 65% built out and the town is assuming this responsibility. If the owners sell the property or go bankrupt, the bond must be binding to the old/new owners or the bank. This protects surrounding environmental areas and properties from harm. How will this be addressed?

7. 4.9-14 of the DEIR states that storm runoff, erosion, or sediment are the most frequent and widespread water quality problems. 4.9-21 states that "no downstream flooding is anticipated." However, as seen in the 8/16/2012 storm, this is very possible. The Lahontan RWQCB water order #2009-0009 DWQ, states the post construction must meet performance standards and mitigate problems. Also, the mitigation must evaluate and mitigate potentials to increased peak flows and increased erosion. Will the DEIR be amended to include post construction regular maintenance, as post construction is not addressed in 4.9-28? Currently the Elkhorn Ridge property boundaries are still lined with decaying black plastic and orange fencing-a hazard for wildlife and the environment. The Town General Plan, chapter 18.30-050 states that temporary measures for erosion control must be taken out unless fully compostable. I cannot find this in the DEIR for Canyon Springs. Are there plans to include it? Also, The Town General Plan, 111-16, requires that drainage and erosion control must be maintained for the life of the project, and includes routine maintenance and repair/replacement of erosion improvements. Are there plans to included this in the DEIR and, if not, why not? No mention of post construction in DEIR BMP's in 4.2-26-27 or 4.9-28.

8. In the Town of Truckee General Plan, 18.34.202, it is stated that Buck Spring flooding is "known to occur." How will this be mitigated by Canyon Springs?

9. Site reconnaissance for the Canyon Springs site was done in June, 2004--since there may be significant changes in topography, are there plans to redo this, and if not, why not?

10. 4.9-15 of the DEIR ground water analysis did not include arsenic which is naturally occurring in site groundwater and is known to exceed the EPA maximum contaminant levels allowable of 0.05mg/liter. How does this effect the runoff from the springs on site and what mitigation will be done to ensure it does not enter the PUD water supply?

11. 4.9-15 of the DEIR states that iron and manganese were reported as having increased levels affecting water quality, but the DEIR did not find anything significant?? How is this possible? This needs to be addressed in the EIR and approval process.

12. 4.9-18 of the DEIR states that "construction has the potential to have a cumulative impact on water quality of receiving waters, which eventually flow to the Truckee River." The DEIR also lists the Truckee River as impaired for sediment. Mitigations did not take into consideration storms such as the 8/16/2012 storm which overwhelmed the sedimentation basins and storm drains. Is this to be addressed in the DEIR?

13. 4.9-20 states that this project could result in a net deficit in the aquifer volume and a decrease in the local ground water table, such that this water would not support existing land uses or planned uses. The PUD maintains there is sufficient water for residents for the 20+ year build out of the project. What about the springs that are used by wildlife for their very survival? What mitigations will be made to ensure that the wildlife will continue to have enough water to support their numbers?

#### General questions:

When this project site was Tahoe Boca Estates, there were many objections to the then DEIR and many amendments. What were the issues that are now not an issue for Canyon Springs, and why?

Prior to Canyon Springs being up for approval, the PUD put up watering restrictions in the Glenshire area. Also plans for water meters were implemented. When Canyon Springs emerged, all signs about watering restrictions were removed. Why was this? If Glenshire needed to restrict watering and have meters installed, how is it possible for the PUD to supply water to the Canyon Springs project without impacting Glenshire residents.

Who oversees and makes sure all mitigations take place over the 20 year life of the project? How will this be communicated to the public?

