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Ms. Denyelle Nishimor  
Town of Truckee Community Development Department  
10183 Truckee Airport Road  
Truckee, CA 96161

Dear Ms. Nishimor,

I have reviewed the Draft Environmental Impact Report for the proposed Canyon Springs subdivision project and I have the following comments for your consideration.

### **Edinburgh Drive access**

On p. 3-20 of the Project Description, there is a mention under heading b. Vehicular Access that “A secondary gated access would connect to Edinburgh Drive to the west of the project site and would only be open to emergency vehicles.” Further on p. 3-22, “The Edinburgh Drive access would be gated and only accessed for emergency use by fire and safety personnel via keyed access.” And then on p. 3-25, it is stated, “As previously described, primarily access would be from Martis Peak Road, and secondary emergency vehicular access would be provided at Edinburgh Drive. This access point would be gated and would be restricted to use by emergency vehicles only. The gate would be pad-locked and only accessible to fire and safety personnel via keyed access during emergency events.”

Neither Section 4.15 Utilities and Service Systems, nor Section 4.14 Transportation and Traffic, include any discussion of the details of this use of Edinburgh Drive access into the proposed project. There are a number of questions that arise about this peculiar use of an existing road into this new development. Specifically they include:

- First of all, in the statements above, what are specifically defined as “emergency vehicles”? Any law enforcement vehicles? Any fire protections vehicles? Any ambulance or EMT vehicles? What other vehicles would be considered “emergency vehicles”?
- What are the parameters that will allow access by emergency vehicles into Canyon Springs via Edinburgh Drive? If there is the need for a single “emergency vehicle” (police, fire, or ambulance) into the Canyons Springs development, would they use the Edinburgh Dr. access point? Or would they have to use the Martis Peak Road access?
- If only one emergency vehicle would not be allowed via Edinburgh Dr, then what are the minimum number of emergency vehicles that would “trigger” the use of the access of Edinburgh Dr.?

- What is defined as an “emergency event”? (p. 3-25). A specific discussion of what constitutes an “emergency event” is needed so the existing residents of Glenshire know what are the parameters for the use of the Edinburgh Dr. access.
- Based on what constitutes and magnitude of an “emergency event”, there needs to be some discussion of the impacts of the use of the Edinburgh Dr. access to the proposed development on the existing residents of Edinburgh Dr as well as the roads connecting from Glenshire Dr. to Edinburgh Dr.
- What is the design of this gate going to be to prevent tampering by residents of the southern portion of Canyon Springs to allow them to open this gate for another access point into and out of Canyon Springs? It is quite apparent from the layout of Canyon Springs that having only one way into and one way out of Canyon Springs via Martis Peak Road, will lead many residents to think “why can’t we use Edinburgh Dr. to get to our homes instead of “going all the way around” to Martis Road, especially those that will live in the southern portion of the development?” There will be considerable temptation for that gate to be tampered with. Padlocked and/or keyed gates can quite easily be compromised.

Based on the questions and uncertainties that I have raised above, I believe that the EIR should include a comprehensive discussion of the Edinburgh Dr. access issue as part of the Public Services and Recreation, Section 4.13. The implications of that discussion could also impact traffic issues and thus warrant revising the Traffic and Transportation (Section 4.14) of the EIR.

### **Air Quality Conditions**

On p.4-35, Mitigation Measure AIR-1 requires that the offset fees collected would be used to reduce particulate matter emissions in the Truckee Air Basin including improvements to street sanding and sweeping operations to reduce re-entrained dust emissions. Since it is the residents of the Glenshire residential area that would bear the brunt of the adverse air quality impacts of the proposed project, the AIR-1 condition should be amended so that the street sanding and sweeping improvements be directed to the Glenshire residential area and not the much larger Truckee Air Basin. Thus I would propose the following language changes (highlighted as underline) to Condition AIR-1:

Mitigation Measure AIR-1: Each residence shall be equipped with a non-wood burning source of heat. Prior to issuance of any temporary or final certificates of occupancy or prior to recordation of the final map, the applicant shall pay an air quality mitigation fee to the Air Quality Mitigation Fund to offset PM10 emissions from solid fuel burning appliances. With payment of offset fee, any solid fuel burning appliances shall be EPA Phase II Certified and limited to one wood-burning appliance per residence. The amount of the fee shall be established by the Town Council resolution and in effect at the time of the building permit issuance or final map recordation. The fees collected will be used to reduce particulate matter emissions from existing sources within as first priority the Glenshire, Elkhorn Ridge and Cambridge estates residential subdivisions and

then secondarily, the Truckee Air Basin including improvements to street sanding and sweeping operations to reduce re-entrained road dust emissions.

There are three Mitigation Measures (AIR-1 through AIR-3) that will limit activities and emissions and/or require specific mitigation measures, AIR-2 being the most specific. The question arises as to what entity or agency will enforce these Mitigation Measures? Will the Town of Truckee or the staff from the Northern Sierra Air Quality Management District be held responsible for enforcing these mitigation measures? How often will inspections at the project site occur to enforce these mitigation measures? What assurances will the local residences have that enforcement of these mitigation measures will be on-going for a possible 20-year or so construction schedule?

These mitigation measures are well intended, but unless very specific enforcement mechanisms are articulated in the EIR as to the agencies or applicant funded enforcement authority (outside environmental compliance company), then the words on paper have little meaning. The EIR needs to thoroughly discuss to the satisfaction of the local residences of Glenshire who the go-to people are going to be to discuss the enforcement of the Air Quality Mitigation Measures.

This concludes my comments on the DEIR for the proposed Canyon Springs subdivision project.

Sincerely,

Keith Golden