

APPENDIX C

Response to Comments

LETTER #1 - John McLaughlin, Town of Truckee Community Development Director

Comment #1 – Response to d: The Lighting Plan will be required to comply with Development Code Section 18.30.060.

Response - The comment is noted and has been further clarified on Page 12 of the Mitigated Negative Declaration (MND).

Comment #2 – MM 3a: How is this considered as an off-set to project contributions to air quality degradation?

It is understood these are prohibited, but as this is not a logical part of the project in the first place how is this mitigation?

Response - The project is located within the Town's PF Zoning District. Wood stoves and other wood burning devices are NOT prohibited within the PF zoning district. It is the intent of the MND to comply with Chapter 7 of the Town's Particulate Matter Air Quality Management Plan by prohibiting wood stoves and other wood burning devices for this project.

Comment #3 – MM 3d: Consider providing the justification as to why pedestrian access is included in this section.

Response - An Air Quality Analysis was performed using URBEMIS, which is the emission estimation program recommended by the California Air Resources Board (CARB). The Northern Sierra Air Quality Management District (NSAQMD) has developed a tiered approach to thresholds of significance based on NOx, ROG and PM10 emissions: Levels A, B and C. Based on the results of the URBEMIS, this project was classified within the Level A and Level B threshold for traffic emissions. The NSAQMD Guidelines for classification as Level B threshold recommend a Mitigation Measure of "pedestrian access between bus service and major transportation points within the project, and between separate sections of the project, where feasible". The justification for Mitigation Measure 3d on Page 18 of the MND has been added.

Comment #4 – MM 4a: This mitigation measure says that the results of the raptor survey should be filed with the "Truckee Donner Recreation and Park District". It is unclear why this document would need to be filed with this special district, since they are not acting as a Trustee Agency for this project.

Response - Mitigation Measure 4A on Page 20 has been revised to remove Truckee Donner Recreation & Parks District as a review agency for the raptor survey.

Comment #5 – Environmental documents must quantify and analyze GHG emissions for projects. This analysis is not provided within the GHG section of the MND and is inconsistent with the recently implemented CEQA Guidelines. There are several easily-accessible models which can be used to generate this information. Town staff recommends incorporation of GHG emission analysis *and* quantification of the benefits provided by the proposed mitigation measures.

While the MND correctly notes that the Town has not adopted thresholds of significance, the MND fails to quantify both emissions and benefits gained from mitigation measures. It is therefore inappropriate to state that the proposed mitigation measures mitigate impacts to a less than significant level without this analysis.

Response - *Section 7 (Greenhouse Gas Emissions) has been updated to include emission quantities and mitigation measures associated with this project.*

Comment #6 – The MND should discuss the impacts (or lack of impacts) of locating 33 employees to an off-site location. Does this increase VMT and therefore, GHG emissions?

Response - *As part of the project, it is anticipated that 33 administrative employees will be relocated to an existing office space located off-site at 12047 Donner Pass Road. Based on the close proximity to the existing hospital, it is not expected to result in an increase to VMT. Section 7 of the MND has been updated to include this discussion.*

Comment #7 – Two of the three proposed improvements related to GHG emissions reductions appear to provide minimal benefit. In fact, two of the improvements are existing facilities and improvements and/or retention of these facilities will not reduce GHG emissions. Staff does not anticipate increased use of the pedestrian crossing in lieu of vehicle trips simply due to its improved state. Installation of bike parking, which is identified as the remaining improvement, only provides mitigation during a portion of a calendar year. The air quality benefits of providing bike parking are only experienced approximately four to five months out of the year, due to Truckee’s climate. Further, during the months bikes are typically not used, air quality impacts are increased due to additional vehicle idling, slower speeds and maneuvering during the winter months.

Response - *Section 7 (Greenhouse Gas Emissions) has been updated to further explain the benefits of bike parking and improvements to pedestrian circulation as it relates to GNG emissions. Since GHG emissions are considered in a “cumulative” context, all reductions to GHG emissions are expected to be beneficial. Although bicycle use is limited to 4 -5 months/year, any reduction to VMT through the promotion of alternative transportation such as walking/biking/public transit is a reduction to the cumulative GHG emissions and is strongly encouraged by the California Attorney General’s Office. Vehicle idling is expected to be reduced significantly with the incorporation of a Parking Management Plan, as discussed in Section 7 of the MND.*

Comment #8 – “Class I bike path” adjacent to Donner Pass Road is actually a Class 2 bike path.

Response - *The MND has been corrected on Page 26 to reflect the correct bike path class.*

Comment #9 – Staff encourages the District to consider incorporating green building techniques which exceed the Title 24 standards as one avenue to achieve mitigation for GHG impacts. This approach is quantifiable and can be directly tied to reductions of GHG emissions. Further, this approach would provide additional benefit beyond that already mandated by the California Building Code.

Response - *The applicant agrees with Town Staff that incorporation of green building techniques can be directly tied to reductions of GHG emissions.*

Town Staff is referred to the Impact Discussion for Section 7a on Page 26 of the MND. As stated in this section, the construction of the new Cancer Center building and upgrades to the existing buildings associated with this project are required to meet and have been designed to the updated California Building Energy Efficiency Standards that went into effect on January 1, 2010. The adopted changes for non-residential buildings incorporate higher standards of efficiency related to roof, wall, insulation, window and HVAC. As stated on the California Energy Commissions website, one of the primary reasons that the Energy Commission adopted the recent changes to the Building Energy Efficiency Standards was to reduce greenhouse gas emissions in response to AB 32 (Global Warming Solutions Act of 2006). These new building standards can be directly tied to reductions of GHG emissions and are required per Mitigation Measure 7b.

Comment #10 – The Drainage Study does not provide the volume of water to be treated and retained on site. Please provide these calculations and volumes. It appears that this table is missing from Appendix D. It is not clear that there is enough volumetric treatment for the project. Also, the locations of where these BMPs are installed shall be provided. Only subsurface infiltration devices were indicated on the post development hydrology map. Does the drainage report include treatment for existing and proposed impervious areas? Please make this clear.

Response - *The table in Appendix D which provides calculations and volumes of water to be treated and retained on site is included within the Drainage Study.*

Comment #11 – Snow storage, snow hauling, and snow melt needs to be addressed within the MND for the proposed project. While we understand that continued maintenance and hauling will likely be included in the maintenance agreement, locations to store snow are still required as part of the project and have not been identified.

Response - *Per the MND, snow storage and snow hauling will be addressed within the Maintenance Agreement between the Town and Hospital District. Snow will be stored on-site in various landscape islands and undeveloped areas. An exhibit showing the locations of the snow storage will be prepared and submitted to Town Planning Department prior to building permit issuance. If the required amount of snow storage cannot be handled on-site, it will be hauled off-site to a permitted disposal site such as the Eastern Regional Landfill Transfer Station.*

Comment #12 – The project does not have sufficient property for the required parking and utilities and therefore relies upon the Town right-of-way (roadway infrastructure) to support the proposed development. Consideration may have been given to this deviation to existing Town policy, but impact discussion needs to address that this is a deviation and how it is to be mitigated.

Response - *The hospital is a public entity and public benefit so a shared use of the public right-of-way adjacent to the hospital is appropriate. Town Staff agreed with the hospital district that better use of the existing paved areas both on-site and within the Town right-of-way was the environmentally superior alternative to building new parking lots and paved areas to accommodate the short peak demand time Monday thru Friday. It was further agreed that a Parking Management Plan would be prepared in order to provide better use and efficiency of the on and off site parking areas. It was also recognized that in order to continue to utilize a portion of the public right-of-way for hospital parking and implement the environmentally superior alternative, a Maintenance Agreement between the Town and Hospital District for roadway and snow removal maintenance responsibilities would be provided to offset the impact to Town services.*

Comment #13 - The MND should address interior noise levels within the proposed Cancer Center building. According to the acoustic analysis, the CNEL on Donner Pass Road will be 67 dBA, which requires noise level reduction to 45 dBA. Staff believes that the building's construction techniques will adequately mitigate interior noise levels; however, the MND does not state this and therefore, it is speculative at this time.

Response - *It was confirmed by Bollard Acoustical Consultants on 7/8/2010 that standard building techniques will adequately mitigate interior noise levels. The minimum noise reduction that is expected by utilizing standard construction techniques is 25 dBA. The impact discussion under 12a of the MND has been updated to address the interior noise level reduction.*

Comment #14 – Town staff strongly encourages the District to include the parking management plan as an attachment to the proposed MND. This document is a critical part of addressing the District's parking and circulation needs and impacts of the project and as proposed, is not available to review as part of the MND. Staff acknowledges that parking is not necessarily a CEQA checklist item; however, inadequate parking or inaccessible parking areas may create additional traffic impacts from users who are unable to find parking during peak hours.

Response - *A draft of the Parking Management Plan was prepared by LSC on July 2, 2010. A copy of the Plan is included as Appendix B8.*

Comment #15 – The Hospital District is proposing to provide a maintenance agreement for areas along Levon Street, Spring Street, Pine Street and Tahoe Drive. A significant amount of parking proposed is located within Donner Pass Road and designated as 100% TFH use. Parking, frontage, and snow removal maintenance activities for the parking areas along Donner Pass Road shall also be included in the maintenance agreement.

Response - Mitigation Measure 16d has been revised to include a portion of Donner Pass Road in the Maintenance Agreement between the Town and the Hospital District.

Comment #16 - MM 16b: The MND does not provide how the carpool program is implemented or monitored. A description of how this program works will need to be provided to consider this mitigation. The implementation of a carpool program was supposedly implemented previously with the construction of the Western Addition.

Response - The TFH District will designate an employee transportation coordinator, and include this responsibility in their written job description. As part of this role, the employee transportation coordinator will:

- *Coordinate ridesharing information, including posting flyers/posters at employee reporting locations and use of email to encourage the use of ridesharing;*
- *Maintain a database of employees interested in carpooling, as well as a means of matching employees. This could be accomplished either in-house, or through a carpool matching website, such as the Washoe Regional Transportation Commission's "Smart Trips" website.*
- *Provide a minimum of four onsite preferential carpool parking spaces, and monitor their use.*
- *Conduct an annual employee survey on commuting travel mode, time of travel, general home location and interest in carpooling. Prepare a concise annual report.*

Mitigation Measure 16b has been updated to reflect the above "minimum" requirements of the carpooling program.

Comment #17 - MM 16d: Parking along Donner Pass Road shall not block the Class 2 Bike paths (5 feet wide). If parking is used along Donner Pass Road, modifications shall be installed along the street frontages to accommodate parking. This comment also applies to Response to F on Page 50 and Exhibit P-1.

Response - Donner Pass Road along the hospital frontage is constructed to the Town's arterial standard (Plate SD-1) which includes adequate width for parking and the Class 2 bike path. The parking along Donner Pass Road will not block the Class 2 bike path.

Comment #18 (Traffic & Parking Study -Appendix B1)

Page 4 Spell out Medical Office Building prior to the abbreviation (MOB).

Page 23 The Town does not support the use of the area just south of Billy Rose Park (area Y on Exhibit P-1) for the proposed parking lot. Engineering will not issue permits for the use of this area for parking.

- Page 23 The Town does not support using parking areas that impact residential areas not part of the hospital property.
- Page 23 The existing parking supply on Table 5 (483) does not match the amount shown here (480). In addition, the on street parking is counted, but a reduction for shared use is not used. Therefore, the highlighted balance of 49 spaces is high.
- Page 25 A reduction of parking demand at the MOB from moving the cancer center and replacing it with doctor office type space is not supported. The MOB parking spaces were based on approved land use at the time of permitting. Although the use of this space as a cancer treatment facility was overcrowded and used more parking than anticipated, that does not warrant reducing the parking space needs for future tenants. At this time, the new use is unknown.
- Page 27 The evaluation of parking demand per person was performed in 2004. Is this still accurate? Also, there is a large reduction due to carpooling by staff. It is not clear if this is every day, occasionally, etc. The frequency of carpooling should be taken into account.

***Response** - The comments provided by Town Staff related to the Traffic & Parking Study are noted. The justification for the reduction of parking demand at the MOB is provided in the Traffic & Parking Study. Regarding the 2004 parking demand, the District and Traffic Consultant believes that nothing of significance has changed since that time that would invalidate that study and is therefore still accurate.*

LETTER #2 - Herb Copeland, Meg Copeland and Richard Copeland

Comment - The authors express concern regarding the impacts of the “very large” Cancer building being proposed in the Gateway area. The letter also expressed concerns regarding notification and requested extension of the public comment period.

***Response** - The authors expressed concerns regarding the size and impacts of a very large Cancer Building in the Gateway area. However, they have not given any specifics as to what those concerns and impacts may be. The initial study and proposed Mitigated Negative Declaration clearly evaluates the proposed Cancer Center and requires proper mitigation measures that reduce any potential impacts to levels that are considered “less than significant”. Without specific concerns, it is difficult to quantify and/or evaluate the concerns expressed.*

A notice was provided in the Sierra Sun, a local newspaper of general circulation, two times commencing on May 21, 2010 and ending on May 26, 2010 (See attached Statement of Publication). In addition to the public notice provided in the Sierra Sun newspaper, Tahoe Forest Hospital District representatives held four public outreach meetings; May 18th, June 2nd, June 15th, and July 1st.

In response to the above-referenced letter from the Copeland’s, the District extended the public comment two weeks to allow for additional time to comment.

LETTER #3 - Richard Helman, Chief, Department of Transportation

Comment - The author notes that although the Caltrans right-of-way on State Route 89 ends to the south of Donner Pass/Frates Lane intersection near the I-80/SR 89 interchange, the operation of the intersection does have an impact on Caltrans facilities. Caltrans notes some suggested improvements to the intersection, both in the short term and long term.

Response – *Improvements to the Donner Pass Road /Frates Lane intersection are listed on the Town of Truckee's Capital Improvement Program. Improvements to that intersection are funded through the Town of Truckee's impact fee program. Mitigation Measure 16a includes both short range and long range requirements of the project, including interim improvements to the intersection as well as impact fees for future improvements. The short range, interim improvements will be based on a detailed analysis of the intersection and approved by the Town Engineer, as detailed in Mitigation Measure 16a.*

LETTER #4 - Beth Ingalls, Associate Editor and Reporter, Moonshine Ink

Comment - The author notes her attendance at a June 2 public outreach meeting held by hospital staff for input on the project. The author suggests that such a large project should have additional comment time and that she was not clearly informed of the comment period.

Response - *Comment noted (see response to Copeland letter, outlining the public noticing provided by the Tahoe Forest Hospital District and additional two week extension period)*

LETTER #5 – (Email) Kaitlin Backlund, MAPF

Comment - The author is concerned about the commenting time periods and the lack of appropriate summary of the CEQA documents on the Hospital's webpage. The author also expresses concern regarding where the CEQA documents can be found for review.

Response - *Comment noted. Proper notice per CEQA was given as detailed above. In fact, the public comment period was extended by two weeks beyond the required period that was posted in the Sierra Sun twice. The CEQA documents were located at the hospital, Truckee Library and Tahoe Forest Hospital's website.*

LETTER #6 - Richard Copeland

Comment - The author submitted a letter stating parking and traffic concerns and included a list of names and addresses. There were no specific concerns stated.

Response - *Comment noted.*

LETTER #7 - Blake Tresan, Truckee Sanitary District

Comment - The District has no comments or objections to the project.

Response - *Comment noted.*

LETTER #8 – (Email) Denny Dickinson

Comment #1 (June 17th) - The author indicates that the parking around the hospital is inadequate and believes additional parking should be provided. Author would like to know where an offsite office space is being relocated.

Response - *See impact analysis for parking under Transportation/Traffic pages 47 and 48 of the MND. Also see mitigation measures 16b., 16c., 16d., 16e, LSC memorandum and June 30, 2010 exhibit that quantifies on street parking counts and available capacity. Additionally, the response to Town Comment #6 for offsite location for relocated employees discusses the off-site location for 33 employees.*

Comment #2 (June 22) - The author explains his Truckee residency and frequent use of the hospital. He questions using the streets for parking during the winter conditions and the lack of adequate pedestrian walkways during winter conditions. He further expressed his concerns regarding crossing of Donner Pass Road and suggests that a roundabout be installed on Donner Pass Road to calm traffic.

Response – *A Maintenance Agreement between the Town of Truckee and the Hospital District will be implemented prior to issuance of Building Permit(s). The Maintenance Agreement will address on-street parking, road maintenance and snow removal during winter conditions. Also, a crossing of Donner Pass Road will be improved per the Traffic Analysis prepared by LSC which provides traffic calming and safer pedestrian circulation.*