

## **B. INDIVIDUALS AND ORGANIZATIONS**

**From:** [Denyelle Nishimori](#)  
**To:** [Wagner, Charity L.](#);  
**cc:** [Kevin Brown](#); [Molly Maybrun](#);  
**Subject:** Railyard Draft EIR Comment #1  
**Date:** Monday, December 15, 2008 4:29:01 PM

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Hi Denyelle

Here are my comments as we discussed earlier this week. I realize this may or may not be an EIR issue, but better to put it in the record now, anyway.

My comments regard the omission of an enforceable mitigation to require a fully planned, funded and executed circulating bus to service the entire downtown area from the Railyard to Brickelltown. There are numerous existing policies in the General Plan and Downtown Specific plan regarding the Railyard, new development, and the need to protect the existing downtown core and it's businesses. The "park once" environment ( ref p.41 vol.1 Draft EIR) will not be practical with a downtown stretching as far as it will with the development of the Railyard. Consider especially that the larger shopping demographic is older, and walking is problematic during our busy winter months. The "seamless interface" ( ref p.73 vol 1 Draft EIR) between the Railyard and existing downtown will be greatly enhanced by the requirement for this type of transit improvement.

It is my fear that if this gets put off approvals later in the process, that it will morph into something that will have a greater cost, and will end up being funded by the Town, the downtown businesses, etc. My feeling is that, as with all development, we are giving away great entitlements, and they should not come without great cost to the developer. Especially when I feel that the inclination will be for visitors to park (free?) in the new Railyard Development area, and not see the existing downtown at all. This need not be an elaborate plan, but I think the earlier it is stated as a requirement from the developer, the better the chance that it will really happen.

Thanks

Fred Zabell  
Alpine Mounting Systems/tahoeposters.com  
10095 West River Street  
Truckee, CA 96161  
582 4790  
fred@tahoeposters.com

LETTER B1

**Fred Zabell**

**December 15, 2008**

Response B1-1:            Though providing a Downtown shuttle service might benefit the Downtown (including the proposed project), it would not generate sufficient ridership to reduce auto use significantly enough to mitigate any of the traffic-related impacts identified in the Draft EIR. As such, it is not an appropriate mitigation measure under CEQA.

Mr. Duane Hall  
Planning Department, Town of Truckee  
10183 Airport Rd.  
Truckee CA  
96161

January 4<sup>th</sup>, 2009

Dear Duane

Thank you for the opportunity to comment on the Railyard Draft Environmental Impact Report. MAPF has incorporated some fresh ideas and concepts regarding the project into the following comments as a result of our consultation with David Mogavero, an award winning Architect and Land Use Planner who was instrumental in a very significant improvement of the Joerger Ranch project. Mr. Mogavero's resume is attached.

Together with David Mogavero, MAPF has reviewed these concepts with Rick Holliday.

**1. A PLACE TO BEGIN...LOCATION, LOCATION, LOCATION**

The most important piece of the sustainability equation is the nurturing of existing communities with high-density mixed-use, pedestrian, and transit-oriented redevelopment that repairs the existing community fabric and enhances the economic, social, and environmental quality of the community.

The Truckee Railyard development will:

- A. Clean up a site with hazardous materials.
- B. Add substantially to Downtown Truckee's status as a destination for regional residents and tourist.
- C. Add as many as 1000 new permanent and occasional residents within walking distance of shops and services. Services providers such as restaurants and cafés will benefit in particular.
- D. Reinforce the rationale for Downtown Truckee to focus new capital investment and services for multimodal transit connections.
- E. Generate resources to aid in much needed infrastructure improvements and additions.
- F. Reduce the need for development in remote places that do not nurture the downtown. have expensive infrastructure demands and contribute overall to global climate changed due to more vehicular travel
- G. Create a walkable streetscape.

- H. The Plan and the location of the development clearly provide many opportunities to create a community that reduces the need for car use and is economically sustainable.
- I. The creation of opportunities for new civic amenities such as a Town Square that will further enhance Downtown Truckee's primacy in the region.

Thus MAPF believes that the Truckee Railyard Master Plan is the right kind of development in the right location.

To that end, please regard our subsequent comments as intended to make a good project as good as it can be, and to develop policy precedents for the Town with broader implications

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**cont.**

**2. TRANSPORTATION/CIRCULATION**

- A. The Big Picture. In 2008, for the first time in history, Californians drove fewer automobile miles than the year before. At the same time, mass transit ridership continues a dramatic increase despite the plunging gasoline prices in the last few months. Most economists are clear that the change in the oil demand/supply balance known as "peak oil" has arrived and that dramatic increases in automobile fuel costs are inevitable in the next decade.

In light of this, we challenge the road capacity increases in the Truckee CIP to which the Railyard project is being asked to contribute. We would ask "why allocate precious community resources into nurturing a mode of transportation that has begun its descent to obsolescence for major segments of the population". Should we not invest those resources into transportation modes that will foster a sustainable economic future such as transit, bicycle access, and pedestrian safety...indeed intersection widening such as turn lanes make the downtown less safe for pedestrians? Ideas are discussed below.

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- B. Transportation Management Association (TMA)

Incorporate monthly fees for property and business owners in the new Railyard Development to fund a part-time staff person, and an office for TMA. A TMA can be structured as a mutual benefit nonprofit corporation. It could also be funded all or in part from redevelopment fees from the development. It could be augmented with the aid of an advisory group composed of diverse stakeholders - analogous to the Housing Advisory Work Group.

It would undertake a broad variety of activities to support the reduction of automobile use including, but not limited to:

- Coordination of carpooling by workers and residents in the project;
- Ensuring availability of information on transportation alternatives;
- Coordinating an emergency ride service for carpooling residents and workers; and
- Functioning as a model and an advocate for increasing transit alternatives by existing operators serving the Downtown

TMAs have been demonstrated to reduce automobile trips by 10% to 30%.

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The TMA could also support auto use reductions for the entire downtown further increasing its efficacy.

It can also be combined with the Green Management Association discussed below to provide a holistic approach to ecologically sustainable behavior.

A TMA would probably need a minimum of \$5,000 per month to be effective or approximately \$7.00 per month for each DU and the balance from businesses in the Railyard.

- C. Forgo some of the Town's transportation mitigation fees to allow the developer to build more structural car parking, which allow increased density, and thus more pedestrian traffic. Each structural parking space will cost \$12,000 to \$20,000.
- D. Close off Church Street to automobile traffic permanently or during specific periods to provide a safe and pleasant route for pedestrians to travel between the Railyard and the rest of the downtown. This could also serve as a venue for community events.
- E. Parking: Do not impose minimum parking standards on the development. Allow the market to determine the quantity of parking needed. Lenders, homebuyers and businesses will not support a project that does not provide an adequate parking, and good developers know this. Parking in all the downtown areas needs to be coordinated.

**3. LAND USE PLAN**

- A. Generally, the design for the public streets in the Master Plan is sensitive to pedestrian safety and comfort.
- B. Trout Creek. A lane or public use trail should be added to the south side of Trout Creek to separate the houses from the riparian area. This will enhance surveillance, safety and public access and the sense that the Creek is an amenity for the community. The open space represented by the Trout Creek corridor should be protected by an easement held by the Truckee Donner Land Trust
- C. Generally, the north to south dimensions of the blocks in the Trout Creek and Industrial Heritage District are not deep enough to support higher density development modules. The North and South Lane could be eliminated as one option.
- D. There doesn't seem to be a compelling rationale for the lower densities in the Trout Creek District. It fronts on an amenity, Trout Creek, that should be shared directly by more people, and will thus provide better surveillance of the open space. In addition, it is our belief that density should be accommodated in the Downtown as much as possible as long as it is reasonably consistent with historic character of the Downtown.
- E. The amount of retail and work/live in the Master Plan should be regarded as a maximum, remembering that people living in the area will replace people who have to drive there. Rather than building specifically commercial or residential space, encourage the use of adaptable shell space. Except for the Movie Theater, early commercial uses should be aimed primarily at the residents, with the target expanding, if appropriate, as time goes on.

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- F. Draw more people into the area by replacing some of the commercial space with public buildings such as a Post office, Library, Railroad Museum, or Performing Arts Center. If land is available for a Post office here, it should be actively recruited, even if it only serves the retail and box delivery function with sorting and delivery occurring elsewhere. It may be eligible for financial support under the Economic Stimulus Plan. Having several public buildings will help give a feeling of ownership of the Railyard to local residents.
- G. The Town needs to play an active role in keeping all pedestrian walkways or Class I trails here and elsewhere in the Downtown Core open and attractive year round, including winter

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**4. SUSTAINABLE BUILDING DESIGN**

There is little about sustainable development or climate change impacts in the Master Plan or DEIR. While we recognize the importance of the location of this project the following can be done easily:

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- A. **Passive Solar Access for Residential.** Because of the altitude, snow, winter sun availability, and temperatures in the Sierra Nevada, the area is one of the best places in the nation for passive solar space heating. Guidelines should be incorporated into the Master Plan to accommodate solar access to the south face of buildings as much as possible. Because of the connection between density and longer-term automobile use reduction, solar access should be balanced against density reductions that could result. Active solar (thermal and photovoltaic) and geothermal should also be evaluated by the Green Management Association (see below)
- B. **Green Building Standards.** Incorporate a minimum green building requirement into the project such as the Build-It-Green Program or USGBC's LEED Program. We would suggest a LEED Gold level or equivalent as a minimum. Within the next few years, the market may be demanding this anyway. Particular focus should be on water efficiency.
- C. **Environmental Inventory.** At the beginning of the implementation of the Master Plan, a broad inventory of resources should be undertaken to access the potential for the project development, and operations to use discarded resources in the immediate community. An example might be the use of biomass to power a hot water boiler for one of the larger buildings.

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**5. GREEN MANAGEMENT ASSOCIATION**

Approximately 20% of energy consumption in buildings is dependent upon the behavior of occupants . . . thermostat settings or allowing the sun to enter south facing windows in the winter, for example. The same is true for recycling, water use, and automobile use. The project should be responsible for establishment and funding of a mutual benefit nonprofit to promote green behavior by residents and businesses in the Railyard Plan area.

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This kind of organization can also function as a sort of concierge service and social promotion entity for the community that can enhance the personal connections in the community as well as connections to neighborhood businesses.

The organization could be funded with a capitalized endowment, or in a manner similar to the TMA.

It would also provide a platform for the community to adopt emerging green innovations in the future.

Rather than creating two non-profits it might be best to begin with a Town Sustainability Advisory Committee to look at both functions, how they can best be carried out, and in what order.

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cont.

**6. PROPOSITION IC FUNDING**

A successful Proposition IC application would be extremely helpful in increasing the quality and affordability of the Railyard development. The Town should proceed with the consideration of the EIR and the Master Plan in a manner that maximizes the readiness points for the project in the next Proposition IC funding cycle.

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Thank you for your consideration of the above ideas. We would be very happy to meet with you in person for further discussion. We have also encouraged Mr. Holliday to continue working with Mr. Mogavero to facilitate implementing his ideas.

We would also appreciate it if you could send this document to Council Members, Planning Commissioners, and any other appropriate individuals.

I have taken the liberty of attaching an elegant review of the energy benefits of infill and brownfields, provided by Terry Watt.

Sincerely Yours



John Eaton.

President

Delivered electronically and by hand.



**David J. Mogavero, AIA, LEED™  
MNA Principal**

David Mogavero, President of Mogavero Notestine Associates, has more than 30 years experience with special expertise in the areas of ecological building, environmental planning, infill development, urban design, and placemaking design.

His commitment to human-based architecture, the revitalization of existing neighborhoods, economic and ecological sustainability of communities, and participation in the planning and design process by end-users is well-known and recognized within professional and citizen communities.

As one of the most experienced advocates and practitioners in land use transit issues in the Central Valley, Mr. Mogavero has actively lectured, written and advocated for environmentally-sound urban development, including infill and higher density, transit and pedestrian-oriented development. Through his professional practice and tenure as a board member and President of the Environmental Council of Sacramento and The Planning and Conservation League, he facilitated the widespread adoption of these principles in many projects and communities throughout California.

**EDUCATION**

BA in Architecture  
State University of New York, 1974

Ohio State University,  
School of Architecture, 1967-1971

**PROFESSIONAL CERTIFICATION**

Architect, California, 1979  
License No. C10145

LEED® Accredited Professional

**PROFESSIONAL EXPERIENCE**

Principal,  
Mogavero Notestine Associates,  
1990 – present

Principal,  
Mogavero Associates, 1983 – 1990

Partner,  
Mogavero + Unruh, 1979 – 1983

Owner,  
Mogavero + Associates, 1978

Employee, Architectural firms in  
Rochester, New York and  
Sacramento, California 1971-1978

**PROFESSIONAL AFFILIATIONS**

American Institute of Architects  
International Council of Shopping  
Centers (ICSC) Planning Committee

Past President, Current Board  
Member, Environmental Council  
of Sacramento, 1987-present

U.S. Green Building Council

Urban Land Institute

**Recent Speeches, Papers & Publications**

"Ecological Building." 2006 City Planning Academy of Sacramento, Sacramento, CA, November 13, 2006.

"Building Communities that Last." Great Valley Center - Sacramento Valley Forum. Chico, CA, October 18, 2006.

"Suburban Infill Development." Northern California BIA Infill Council. Roseville, CA, September 28, 2006.

"Urban Renaissance in Second Tier Markets." PCBC 2006. San Francisco, CA, June 23, 2006.

"Energy Efficient Affordable Housing." California Coalition for Rural Housing. Sacramento, CA, May 30, 2006.

"Strip Centers Reborn: The Densification of Suburbia." 2006 ICSC Idea Exchange. Monterey, CA, April 5, 2006.

"Suburbs the Greatest Redevelopment Opportunity." CRA 2006 Annual Conference & Expo. Monterey, CA, March 8, 2006.

"Ecological Building and Smart Growth in Sacramento." 2005 City Planning Academy of Sacramento, Sacramento, CA, November 2, 2005.

"Urban Retail and Housing Development." LISC Urban Forum 2005, San Francisco, CA, May 23, 2005.

"Getting to know you: Residential and Retail Developers." 2005 ICSC Idea Exchange. Monterey, CA, March 16-18, 2005.

"Mixed-use & Infill Development in the Sacramento Region." University of California at Davis, Planning Class, Davis, CA, January 21, 2005.

"Mixed-use & Infill Development in the Sacramento Region." Old Republic Title, Sacramento, CA, January 20, 2005.

"Greening Affordable & Multifamily Housing." Green Affordable Housing Coalition, Sonoma State University, USGBC Redwood Empire Chapter, December 14, 2004.

"Integrating Affordability, Environmental Values, and Green Building." Planning and Conservation League Foundation, Smart Growth Conference, Sacramento, CA, September 14, 2004.

"Economic Development Discussion." SMUD Board, Sacramento, CA, September 2, 2004.

"Ecological Building 101." Planning Academy of Sacramento, Sacramento, CA, May 3, 2004.

Program Planning Committee Co-Chair, International Council of Shopping Centers, Idea Exchange, Monterey, CA, March 24 – 25, 2004.

"Trends & Patterns in CA Retail." California Redevelopment Association Conference, Monterey, CA, March 11, 2004.

"Infill Housing Today." California Redevelopment Association Conference, Monterey, CA, March 11, 2004.

**PROFESSIONAL & COMMUNITY  
 ACTIVITIES**

**David J. Mogavero, AIA, LEED™  
 MNA Principal**

2001 Carla Bard Award for more than 20 years of committed service to California's Environmental Movement, Planning & Conservation League

Peer Review, Affordable Housing Guidelines, Arizona Herberger Center for Design Excellence, College of Architecture & Environmental Design, Arizona State University, 1996

Juror, The Leading Edge 1997 Student Design Competition, Building Industry Institute

Juror, The Leading Edge 1996 Student Design Competition, Building Industry Institute

Juror, The Leading Edge 1995 Student Design Competition, Building Industry Institute

Juror, 1995 Ahwahnee Awards, Local Government Commission

Faculty, Cosumnes River College, Environmental Design Department, 1979 - 1994

Juror, American Society of Landscape Architects 1993 Design Competition

President, 1988-1989;  
 Board Member 1987-present  
 Environmental Council of  
 Sacramento

President, The Sacramento Old City Association, 1986 & 1987

Chair Member, The Mayor's Downtown Action Committee, 1987

Member, City Architectural Design Review Board, 1981 - 1984

"Prevailing Uncertainty: How to Provide Housing in a State Unknowns." CRA CAL-ALHFA Housing Conference, Oakland, CA, October 29 - 30, 2003.

"Smart Growth & Affordable Housing: Building the Connection." Great Valley Center 2003 Conference, Sacramento, CA, May 14, 2003.

"Infill Development & Policy." UC Davis Infill Seminar, Davis CA, April 30, 2003.

"Mixed-Income Communities." Housing California 2003 Conference, Sacramento, CA, April 28, 2003.

"Energy Efficiency for Multi-family Housing." Housing California 2003 Conference, Sacramento, CA, April 27, 2003.

"Smart Growth Development Examples." Planning Conservation League Legislative Symposium, Sonoma State University, April 26, 2003.

"Urban Design for Infill Housing." League of California Cities Planners Institute, San Diego, CA, March 22, 2003.

"Infill Housing." California Redevelopment Association Annual Conference & Expo, Palm Springs, CA, March 2003.

"Case for Infill Development." Pacific Coast Builders Conference, San Francisco, California, June, 2002.

"Improving Energy Efficiency—Comfort ability, Affordability & Your Bottom Line." Housing CA Conference, Sacramento, California, May, 2002.

"The More Things Change, The More They Stay The Same." Great Valley Conference, Sacramento, California, May, 2002.

"Smart Growth Policy." Great Valley Center Annual Symposium, Sacramento, California, May 14, 2002

"Infill Development and Policy." University of California, Davis, Davis, CA, April 30, 2002

"Mixed Income Housing." Housing California, Sacramento, California, April 28, 2002

"Energy Efficiency for Multifamily Housing." Housing Sacramento, CA, April 27, 2002.

"Smart Growth Development Examples." PCL 2003 Legislative Symposium, Rohnert Park, California, April 26, 2002

"Urban Design for Infill Housing." League of California Cities Commissioners Conference, San Diego, California, February 21, 2002

"Infill Housing." California Redevelopment Association Conference, Palm Springs, CA, February 6, 2002

"Smart Growth in the Cities." Planning and Conservation League 2002 Legislative Symposium, February 2002.

"Smart Growth: Myth or Reality." MMANC Annual Conference, Folsom, CA, October 2001.

"Creating Downtown Housing." CDA/Main Street Conference, October 2001.

"Energy Efficiency in Affordable Housing." Housing California Conference, May 2001.

"The Challenge of Creating Successful Town Centers." Making Cities Livable Conference, December 2000.

"Evolutions in Site Planning." Reshaping the Regional Grocery Marketplace, ICSC Conference, October 2000.

"Green Building." California Resource Recovery Association, July 2000.

"Design for Existing Neighborhoods." Congress for New Urbanism, Portland, OR, June 2000.

"Local Growth Control Initiatives." Planning and Conservation League 2000 Legislative Symposium, March 2000.

**ENERGY BENEFITS OF URBAN INFILL, BROWNFIELDS, AND  
SUSTAINABLE URBAN REDEVELOPMENT**

**A Working Paper**

**Evans Paul**

**Northeast-Midwest Institute  
Updated, April, 2008**



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Northeast-Midwest Institute  
April 18, 2008

***Preface and note to reader:*** *This is a working paper in the sense that it is a “work in progress.” It summarizes current research on the intersection of urban infill development, brownfields, and energy. With new data coming out rather frequently, the Northeast-Midwest Institute (NEMW) intends to continue to update the document. Note also that NEMW is proposing to undertake a more in-depth analysis of brownfields, infill, and energy to cover the rest of the data gaps and to explore related policy issues in greater detail.*

*Evans Paull, Northeast-Midwest Institute, [epaull@nemw.org](mailto:epaull@nemw.org)*

### Summary

Brownfields and urban redevelopment programs have well-documented benefits of restoring neighborhoods, bringing back jobs, cleaning up abandoned factories, and converting eyesores into assets. Several studies have made the connection between urban/brownfields redevelopment and the avoidance of sprawl-related environmental impacts. That is, the reuse of formerly contaminated properties located amid city neighborhoods, or infill, lessens some of the negative effects of scattered development in suburban area, or sprawl. When compared to spread out building patterns, compact infill redevelopment produces substantial air quality and energy-related benefits. The currently available research on these subjects is cited in the paper.

NEMW is using the term “sustainable urban redevelopment” as a generic term to describe development that is green and energy-efficient both internally within the building envelope and externally, in that there are energy savings by virtue of the project location and its relationship to the city. This dual benefit is key. Generally, green/energy-efficient buildings are designed to save about 30 percent on energy use within the structure. Post-construction studies of Leadership in Energy and Environmental Design (LEED)-certified projects confirm that level of energy savings. Externally, “compact urban development” saves 20 to 40 percent of vehicle miles traveled (VMT) with corresponding reductions in greenhouse gases (GHGs). Brownfields, as a subset of urban redevelopment, have been shown to have similar VMT-related energy benefits. When redevelopment projects combine both elements (VMT reduction *and* energy-efficient buildings), the energy savings can be estimated to be 30 to 35 percent of the total energy demands attributable to the development, relative to conventional construction in suburban auto-dependent locations.

While this is a considerable documented energy benefit, there are other factors not accounted for which may cause the percentage reduction to go even higher. Not taken into account in the above calculation are the following factors:

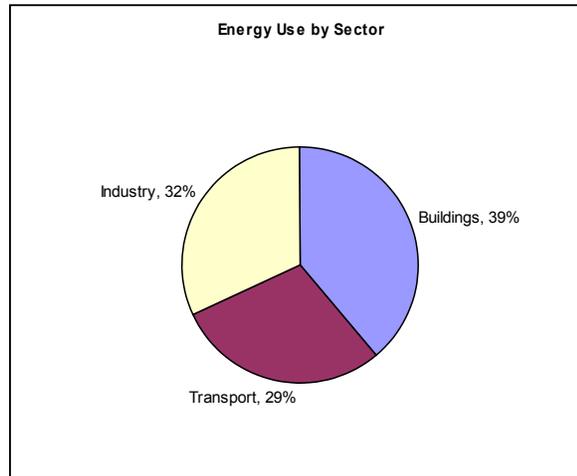
- Urban density is associated with energy efficiencies within the building due to fewer exposed surfaces.
- There is less “line-loss” in distributing electricity to dense urban areas than to spread suburban areas.
- Less energy is spent in building and maintaining infrastructure for urban projects than suburban sprawl projects.
- Some urban projects are served by waste-to-energy plants or district heating systems that also lower GHGs.
- An indirect benefit of urban redevelopment is the retention of greenfield “carbon sinks.”

While these latter factors remain insufficiently quantified (and further study is recommended), the previous point – the dual benefit of energy savings within the building envelope and VMT reduction – makes a sufficiently strong case that promotion of sustainable urban redevelopment can be a major source of greenhouse gas reduction.

**Brownfields, Urban Redevelopment, and Energy**

Brownfields and infill/redevelopment projects have multiple benefits, ranging from ameliorating public health risks, to generating economic vitality and saving valued land from sprawl. This paper explores the potential for brownfields and infill development to also serve as a potential element of energy conservation and climate change strategies.

The chart at the right functions to frame the potential for urban infill projects to impact the energy sector. Infill/redevelopment activities can significantly impact two of the three sectors. If the project is green/energy efficient, it impacts building-related energy demands. If the project is also well-located vis-à-vis the urban context, it can also significantly impact the transportation sector. It is this dual benefit of sustainable urban redevelopment that holds great potential as an energy/climate solution. Attempting to quantify these benefits is the central point of this report.



Source: U.S. Department of Energy, Energy Information Administration

**Transportation, Energy, and Sustainable Urban Development**

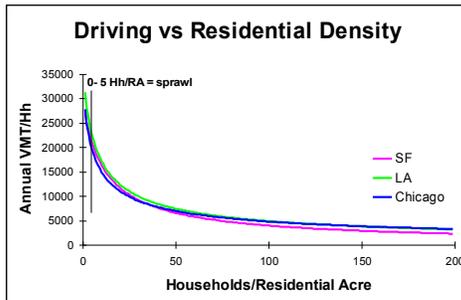
**Urban Infill/Compact Development and VMTs.** Transportation accounts for 29 percent of total U.S. energy demands. Current energy policies, as well as most proposed strategies for addressing greenhouse gases (GHGs), concentrate on fuel efficiency and alternative fuels as the primary mechanisms to conserve energy and reduce GHGs. This approach is short-sighted because projected increases in vehicle miles traveled (VMT) are likely to more than counterbalance the foreseeable gains attributable to fuel efficiency and expanded use of alternative fuels. A recent report released by Urban Land Institute (ULI) documents that compact urban development, as an alternative to sprawl, could reduce VMT by 20 to 40 percent, or 30 percent as an average.<sup>1</sup> This translates into a reduction of driving-related greenhouse gases by 7 to 12 percent by 2050. Factors that determine the greater and lesser VMT savings attributable to urban compact development are:

- Density
- Location near city center
- Mix of uses/internal design

<sup>1</sup> Urban Land Institute, Smart Growth America, the Center for Clean Air Policy, and the National Center for Smart Growth, "Growing Cooler: Evidence on Urban Development and Climate Change," Washington, D.C. January 2008 <http://www.smartgrowthamerica.org/gcindex.html>

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- Degree of connection to the existing grid
- Access to transit



Another study reviewed the evidence of the relationship between density and VMTs – most studies reviewed indicate that any doubling of density corresponds to lowering of VMTs by about 25 percent. The authors also compared highly dense North Beach in San Francisco (100 households/residential acre) to low density suburban San Ramon (three households/residential acre) and found that North Beach reduced VMTs by 75 percent.<sup>2</sup>

Source: “Location Efficiency: Neighborhood and Socio-Economic Characteristics Determine Auto Ownership and Use,” John Holtzclaw,\* Robert Clear, Hank Dittmar, David Goldstein and Peter Haas

Other studies have come to similar conclusions.<sup>3</sup>

- A Center for Clean Air Policy study found that VMTs were an estimated 25 percent lower for an urban 20-unit per acre development than a suburban four-unit acre per acre development.
- An Atlanta regional study found that the travel patterns of residents of the area’s “most walkable neighborhoods” accounted for 30 percent lower VMTs and 20 percent lower greenhouse gas emissions than the travel patterns of residents of the “least walkable neighborhoods.”<sup>4</sup>
- A King County, Washington, study concluded that urban “interconnected neighborhoods,” defined by density, frequency of intersections, and grid street patterns, reduced VMTs by 26 percent relative to a suburban spread development model.<sup>5</sup>

**Brownfields, Compact Development, and VMTs.** Brownfields projects, as a subset of urban redevelopment activities, have demonstrated similar benefits in reduced VMTs. A study carried out by the U.S. Conference of Mayors compared development of brownfields and greenfields, in Baltimore and Dallas. It concluded that brownfields redevelopment saved between 23 and 55

<sup>2</sup> “Location Efficiency: Neighborhood and Socio-Economic Characteristics Determine Auto Ownership and Use,” John Holtzclaw,\* Robert Clear, Hank Dittmar, David Goldstein and Peter Haas, *Transportation Planning and Technology*, Vol. 25(1), pp 1-27, March 2002.

<sup>3</sup> Some of the studies include Pew Center on Global Climate Change, “Towards a Climate-Friendly Built Environment,” [Pew Report](#); Kris Wernstedt, “Overview of Existing Studies on Community Impacts of Land Reuse,” National Center for Environmental Economics, 2004; The Funders Network and the Environmental and Energy Study Institute, “Energy and Smart Growth – It’s About How and Where We Build”

<sup>4</sup> Walkable neighborhoods were defined by three criteria: density, mixed land uses, and the interconnectedness of the street patterns. David Goldberg et al., “New Data for a New Era: Linking Land Use, Transportation, Air Quality, and Health in the Atlanta Region”

<sup>5</sup> Larry King, “Sprawl and Public Health,” *Public Health Reports*, May-June 2002.- <http://www.cdc.gov/healthyplaces/articles/Urban%20Sprawl%20and%20Public%20Health%20-%20PHR.pdf>

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percent of VMTs.<sup>6</sup> EPA's study of Atlantic Station in Atlanta, a mixed-use redevelopment of the Atlantic Steel brownfields site, found VMT savings of a similar magnitude -- 14 to 52 percent.<sup>7</sup> These studies are based on a limited number of sites, leading to the question of how representative they are of all brownfields sites. This shortcoming will soon be remedied by the findings of an EPA study that involves a much larger number of sites.

In summary, the information currently available posits a strong tie between compact infill reuse and lower energy demands from VMTs compared to suburban spread development. Limited data on the brownfields subset of urban redevelopment tends to indicate similar energy savings, on the order of 20 to 40 percent.

### **Buildings and Energy**

Transportation is only one of the three major components of energy demands, the other two being industry and buildings. Buildings make up about 39 percent of energy demands, significantly higher than the transportation sector at 29 percent.

**Green/Energy-Efficient Buildings.** Green buildings represent one obvious potential source of energy savings. One post-construction analysis of 125 green buildings concluded that LEED-certified buildings save an average of 25 to 30 percent in energy demands.<sup>8</sup>

If an urban redevelopment project is on the high end of the VMT savings (40 percent) *and is* green/energy-efficient, the total energy savings can be estimated to be approximately 35 percent of the energy demands attributable to the facility, relative to conventional construction in suburban auto-dependent locations.

The extent to which green/energy-efficient development is correlated with brownfields and other urban redevelopment projects is unknown. The evidence, largely anecdotal, suggests a strong connection.

- U.S. Green Building Council data indicate that 25 percent of applicants to the Leadership in Energy and Environmental Design—Neighborhood Development (LEED-ND) pilot are applying for points under the brownfields criteria.<sup>9</sup>
- Cherokee Investment Partners, the nation's largest brownfields developer, announced the adoption of a corporate objective of seeking LEED certification for all its projects, whenever feasible.
- The Northeast-Midwest Institute, in preparing a [Tax Increment Financing Report](#) tax report, found that all four highlighted "mega-brownfields" projects were seeking LEED certification.
- Discussions with brownfields practitioners indicate a strong trend of brownfields and urban redevelopment projects going green.

<sup>6</sup> "Clean Air/Brownfields Report" U.S. Conference of Mayors, December 2001.

<sup>7</sup> U.S. Environmental Protection Agency, "Atlantic Steel Redevelopment," Washington, D.C., 2006, <http://www.epa.gov/innovation/collaboration/atlanticsteel.pdf>

<sup>8</sup> Greenbuild, "LEED Delivers on Predicted Energy Savings" (survey of 125 LEED-certified buildings)

<sup>9</sup> U.S. Green Building Council data provided to the Institute in October 2007.

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April 18, 2008

- Many observers, including leading brownfields and green building real estate consultants such as [Strnisha Associates](#) and [Evolution Partners](#), cite marketplace changes that are leading to brownfields and generally, urban redevelopment projects, going green. There is a demand-supply phenomenon that potential buyers and tenants of urban/brownfields redevelopment projects tend to be looking for green elements and that urban redevelopers tend to be trendsetters and risk-takers.

Some of the many brownfields projects that are also high performance/green are listed in Appendix 1.

The tentative conclusion is that a correlation exists between brownfields and green buildings, but its magnitude is as yet unknown.

**Density and Energy Efficiency.** As discussed above, density factors heavily into VMTs and transportation-related energy savings, but also affects energy savings in buildings. One analysis found that electricity use in buildings of five or more multi-family units averages almost 50 percent less than single-family detached units.<sup>10</sup> A new analysis of detached vs. multi-family dwellings in Florida came to similar conclusions, but across the full energy spectrum.<sup>11</sup> The authors of the ULI “Growing Cooler” report concluded that after controlling for socio-economic variables, multi-family/compact development uses about 20 percent less energy than comparable single-family detached units, largely because of fewer exposed surfaces.<sup>12</sup>

Brownfields projects were analyzed for land utilization and density in a 2001 George Washington University study which found that, on average, one acre of brownfields redevelopment equaled 4.5 acres of greenfields development.<sup>13</sup>

The relationship between brownfields and density is further confirmed by a Northeast-Midwest Institute analysis of LEED-certified projects which found that sites that qualified for brownfields points were more than twice as likely, relative to all LEED applicants, also to qualify for LEED density points.<sup>14</sup>

One further piece of evidence comes from a study of residential brownfields projects in Milwaukee and Chicago which found that 83 percent of all units were multi-story (three stories or more) condominiums and apartments. The 32 Milwaukee projects averaged 29 dwelling units per acre. The 51 Chicago projects averaged an even higher 58 dwelling units per acre.<sup>15</sup>

<sup>10</sup> Naomi Freeman, “Connecting Energy and Smart Growth,” Environmental and Energy Study Institute presentation, 2006.

<sup>11</sup> Robin K. Vieira and Danny S. Parker, “Energy Use in Attached and Detached Residential Developments: Survey Result,” <http://www.fsec.ucf.edu/en/publications/html/FSEC-cr-381-91/> Florida Solar Energy Center, 2007

<sup>12</sup> Urban Land Institute, Smart Growth America, the Center for Clean Air Policy, and the National Center for Smart Growth, “Growing Cooler: Evidence on Urban Development and Climate Change,” Washington, D.C., January 2008 <http://www.smartgrowthamerica.org/gcindex.html>

<sup>13</sup> George Washington University, [http://www.gwu.edu/~eem/Brownfields/project\\_report/chapters-html.htm](http://www.gwu.edu/~eem/Brownfields/project_report/chapters-html.htm)

<sup>14</sup> The Institute found that 43 percent of LEED-certified projects that get points for brownfields also qualify for density points. This compares to 20 percent of all LEED projects that qualify for density points. Source: data provided by the U.S. Green Building Council and analyzed by Northeast-Midwest Institute, Feb. 7, 2007.

<sup>15</sup> Chris De Sousa, “Residential Development Activity on Urban Brownfields in Milwaukee and Chicago,” University of Wisconsin at Milwaukee, September 2006.

The conclusion is that there is a strong correlation between brownfields and density, and a consequent energy savings in both the transportation sector and in the buildings sector, but the data is currently insufficient to discern the degree of correlation and the magnitude of the energy savings.

**Building Preservation and Energy.** According to the National Trust for Historic Preservation, it takes approximately 65 years for a green, energy-efficient new office building to recover the energy lost in demolishing an existing building and building a new one. This finding counts the “embodied energy” that has been invested in the building over time, which makes the data inconsistent with other energy use data. Nevertheless, another point in favor of urban redevelopment is that redevelopment more often involves rehabilitating existing buildings, which takes less energy than building a new one.

#### **Site-Related Energy Factors**

Four more potential sources of energy savings are associated with brownfields/infill projects. These site-related factors are discussed below.

**Infrastructure-Related Energy Demands.** Urban redevelopment/brownfields projects generally use existing infrastructure and can be credited with energy savings associated with building and maintaining infrastructure when compared with greenfields development. A Center for Neighborhood Technology study found that the cost of providing infrastructure (roads, water, sewer, electricity, etc.) to a greenfields site averages \$50,000 to \$60,000 per unit, compared to \$5,000 to \$10,000 per unit for a brownfields or greyfields site.<sup>16</sup> If energy use parallels costs, the comparative energy savings are substantial. The [PLACES<sup>3</sup>S](#) energy land use modeling program, when it was adopted in 1996, accounted for the energy used in building and maintaining infrastructure with an urban-suburban differential of 25 percent.<sup>17</sup>

**Greater Efficiency in Transmitting Energy.** There may be efficiencies, or lower line-loss, in distributing energy to sites that are closer to transmitting/generating stations within the existing service areas, and that are densely developed. According to the Environmental and Energy Study Institute, line-loss equates to nine percent of all electricity nationally. While common sense would indicate that there is less line-loss in serving urban compact areas, as opposed to suburban spread development patterns, NEMW has not been able to find any current research to document and quantify the extent of the correlation.

**Distributed Energy.** There are energy savings attributable to use of distributed energy, combined heat and power (CHP), and/or other alternative or more efficient fuels. Because many cities have waste-to-energy plants that serve centralized areas, this is another source of lowered demands for fossil fuels and lowered emissions. One study concluded that one 1,500-ton-per-day waste-to-energy facility in the northeast saved 270,000 tons of carbon-dioxide-equivalent emissions

<sup>16</sup> Cited in: Environmental and Energy Study Institute and the Funders Network, “Energy Smart Growth: It’s About How and Where We Build.”

<sup>17</sup> Naomi Freeman, “Connecting Energy and Smart Growth,” Environmental and Energy Study Institute, 2006 presentation.

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annually.<sup>18</sup> However, it is not known how much of this savings is specific to serving urban core and brownfields areas.

***Saving Greenfields as “Carbon Sinks.”*** One last indirect energy benefit of urban infill and brownfields redevelopment is the protection of “carbon sinks,” i.e., greenfields that would have been developed absent the urban redevelopment project. No attempt has been made to quantify this factor, but it should be noted that tree-planting and reforestation are elements in some state strategies to reduce GHGs.<sup>19</sup> Also note the previously cited study that quantifies the brownfields-greenfields trade-off at 4.5 acres saved per one acre developed. Thus it makes conceptual sense that urban redevelopment, because of the indirect benefits of saving greenfields, should be viewed as part of climate change plans.

### **Further Study Needed**

This paper has reviewed the known information that ties together brownfields, sustainable development, and energy. Appendix 2 summarizes the data in table form.

There are two kinds of data/research gaps problems that should be addressed.

First, there are a number of factors where the connection between urban redevelopment and energy is not sufficiently documented or quantified. These include:

- Density as a factor in energy efficiency within the building;
- Line-loss in the distribution of electricity;
- Energy required to build and maintain infrastructure;
- The “carbon sink” value of greenfields preserved, an indirect benefit of urban infill;
- The GHG savings attributable to waste-to-energy district heating systems;
- The degree of correlation between urban infill/brownfields redevelopment and green buildings; and
- The energy saved when buildings are renovated relative to new construction.

Second, there is a need to assess the “energy characteristics” of subsets of urban redevelopment projects. In order to strengthen the case that brownfields, historic preservation, or any other category of urban redevelopment projects represent a legitimate place to be lined up with energy-related resources, there is need for better data about the characteristics of those projects. Taking brownfields as an example, a representative sampling of brownfields projects should be analyzed for these questions:

- Are brownfields projects more likely than greenfields projects to be green/energy-efficient?
- What are the density characteristics of brownfields projects in contrast to typical suburban sprawl development?
- Are brownfields projects more accessible to public transportation and to what extent do brownfields projects qualify as transit-oriented development?
- Are brownfields projects typically mixed-use and interconnected to the urban grid?

<sup>18</sup> New York Department of Environmental Conservation, “Waste-to-Energy: Reducing Emissions of Greenhouse Gases,” <http://www.dec.ny.gov/chemical/8979.html>

<sup>19</sup> National Governors Association, Center for Best Practices, “Growing with Less Greenhouse Gases,” <http://www.nga.org/cda/files/112002GHG.pdf>

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- How many brownfields projects are served by distributed energy systems?

This data can then be used to more accurately estimate the potential energy savings attributable to brownfields and infill redevelopment. With an accurate picture of energy impacts, further research should also be carried out to explore the policy implications: how can energy policy work encourage brownfields/infill development? How can community development and incentive programs be altered to further benefit the objective of saving energy?

\*\*\*\*\*  
*Funding for this report was provided by a grant from the U.S. EPA. The information contained in this report does not necessarily reflect the views of the U.S. EPA.*

**Appendix 1. Brownfields and Green Buildings Projects**

<b>City/Project Name</b>	<b>Development</b>	<b>Status 1/08</b>	<b>Green Elements</b>	<b>Federal Funds</b>
Baltimore, MD – <a href="#">Montgomery Park</a>	1.3 million sq ft office; 3,500 jobs	55% occupied	Green roof; energy-efficient, recycled building materials; bio-retention; recycled grey water	\$1 million BEDI \$8 million HUD 108 Historic tax credit
Portland – <a href="#">South Waterfront</a>	Mixed use – Phase I: 3,000 DU's 5,000 jobs	Several bldgs complete	All bldgs LEED certified, some LEED gold/platinum; solar; trail/open space; stream restoration	EPA cleanup grant for park
Baltimore, MD – <a href="#">Brewer's Hill</a>	737,000 sq ft commercial/mixed use space	First phase complete	Green roof; grey stormwater system; recycled materials; 25% energy efficiency savings	EPA site assessment Historic tax credits
Cambridge, MA - <a href="#">Genzyme</a>	350,000 sq ft Corporate headquarters	Complete	LEED platinum; 42% energy efficiency savings; 34% water usage savings; 75% recycled building materials	
<a href="#">Chicago Center for Green Technology</a>	Non-profit office	Complete	LEED platinum, roof gardens, solar, recycled grey water	
Little Rock, AK – <a href="#">Heifer International</a>	28 ac; 200 jobs	Complete	Model green parking lot	EPA pilot
Baltimore, MD – <a href="#">Gateway South</a>	11 ac; \$125 million mixed use; 1,600 jobs	Planned	LEED silver projected	EPA site assessment \$975,000 BEDI \$13 million HUD 108
Bethlehem, PA – <a href="#">Lehigh Valley Industrial Park</a>	42,000 sq ft office	Planned	LEED – sunshades, energy efficiency	EPA cleanup HUD 108 BEDI
Denver – <a href="#">Cherokee Denver</a> (Gates Rubber)	Mixed use – 3,000 DU's and 1.75 million sq ft commercial space	To start construction in 2008	Transit-oriented development LEED certification planned	
Atlanta, GA - <a href="#">Atlantic Station</a>	Mixed use – 5,000 DU and 30,000 jobs	More than 50% complete	LEED certification; <a href="#">Going Carless</a> Program	
Cleveland, OH – Flats East Bank	Mixed use – 500 DU and 600,000 sq ft commercial space	Planned	LEED gold projected	EPA Brownfields
Redding, CN <a href="#">Georgetown Land Development</a>	Mixed use – 416 DU, 300,000 sq ft commercial space, theater, B&B	Under construction	Photovoltaics, hydro-electric dam, fuel cell system, transit-oriented development	EPA Brownfields CDBG Green Bonds
New York, NY – <a href="#">Via Verde</a>	202 DU affordable housing	Planned	LEED gold - green roofs, geothermal, photovoltaics	

## Appendix 2

<b>Sustainable Urban Redevelopment, Brownfields, and Climate Change – By the Numbers<sup>i</sup></b>	
<b><i>Smart Growth and Vehicle Miles Traveled (VMT)</i></b>	<b>Percentages and metric tons of CO<sub>2</sub></b>
o The percentage of energy demands accounted for by transportation	29%
o Total CO <sub>2</sub> accounted for by transportation	1,729 million tons
o The percentage growth of greenhouse gas (GHG) emissions from mobile sources from 1990 to 2004	29%
o If fuel efficiency/CAFE standards are increased by 40% (to 35 MPG), but VMTs continue rising at 2% annually, what will happen to GHGs? <sup>ii</sup>	GHGs increase 12% by 2030
o The 10 most “compact” metropolitan areas (example: Portland) reduce average per person VMTs relative to the 10 most “sprawling” metropolitan areas (example: Atlanta) by: <sup>2</sup>	25%
o “Compact urban development” (with density 2-3 times typical suburban density) reduces VMT compared to sprawl development patterns by: <sup>2</sup>	20% – 40%
o If 60 percent of new growth by 2050 is accommodated in “compact urban development,” travel-related greenhouse gas emissions would be cut by: <sup>2</sup>	7% - 10% or 85 million tons
o For a typical office building, the energy used in employee access exceeds the energy used in the building by: <sup>iii</sup>	30%
o <b><i>At the individual level</i></b> , moving from the suburbs to an urban compact neighborhood is equivalent to driving a hybrid.	
▪ Hybrid fuel efficiency saves CO <sub>2</sub> relative to average vehicle fuel efficiency	2 tons
▪ Urban compact neighborhood saves CO <sub>2</sub> via lower VMTs	2.1 tons
<b><i>Buildings – Energy-Efficiency and Density</i></b>	
o The percentage U.S. CO <sub>2</sub> emissions accounted for by buildings <sup>iv</sup>	39%
o Total CO <sub>2</sub> accounted for by buildings	2,290 million tons
o The percentage reduction in energy use of LEED-certified buildings, compared to non-LEED buildings <sup>v</sup>	25% - 30%
o The percentage reduction in energy used by households in multi-family dwellings compared to single-family detached dwellings <sup>vi</sup>	50%
▪ If income and DU size are held constant, the percentage reduction is <sup>2</sup>	20%
o <b><i>At the individual level</i></b> , if you moved from a single-family detached house to a green multi-family condo or apartment of the same size, you would be reducing your structure-related GHGs by about	42% or 4.8 tons
<b><i>Public Transportation</i></b> <sup>vii</sup>	
o Net carbon dioxide saved from public transportation (CO <sub>2</sub> emissions from personal vehicles if no transit service less emissions from public transport)	3.9 million tons
o Additional carbon dioxide saved from transit-reduced congestion	3.0 million tons
o Total carbon dioxide savings from public transportation	6.9 million tons
o An average American family spends 19% of its income on transportation, but, for households in “transit-rich neighborhoods,” the percentage drops to <sup>viii</sup>	9%
o <b><i>At the individual level</i></b> , if an individual commuting 20 miles switched from automobile to transit, that would save	2.2 tons
<b><i>Infrastructure</i></b>	
o One study concluded that it takes less energy to build and maintain infrastructure for urban infill relative to suburban development by a factor of <sup>ix</sup>	25%

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<i><b>Distributed Energy – Waste-to-Energy Plants</b></i>	
○ CO <sub>2</sub> emissions saved by one 1,500-ton-per-day waste-to-energy facility <sup>x</sup>	270,000 tons

<sup>i</sup> Source unless otherwise specified: U.S. Department of Energy, Energy Information Administration, and Northeast-Midwest Institute.

<sup>ii</sup> Urban Land Institute, Smart Growth America, the Center for Clean Air Policy, and the National Center for Smart Growth, "Growing Cooler: The Evidence on Urban Development and Climate Change," Washington, D.C., January 2008, <http://www.smartgrowthamerica.org/gcindex.html>

<sup>iii</sup> Alex Wilson, "Driving to Green Buildings," Environmental Building News, September 2007

<sup>iv</sup> U.S. Department of Energy, Buildings and Energy Data Book, 2007

<sup>v</sup> Greenbuild, "LEED Delivers on Predicted Energy Savings" (survey of 125 LEED certified buildings)

<sup>vi</sup> Naomi Freeman, "Connecting Energy and Smart Growth," Environmental and Energy Study Institute presentation, 2006.

Also: Robin K. Vieira and Danny S. Parker, "Energy Use in Attached and Detached Residential Developments: Survey Result," <http://www.fsec.ucf.edu/en/publications/html/FSEC-cr-381-91/>

<sup>vii</sup> SAIC, "Public Transportation's Contribution to Greenhouse Gas Reduction," September 2007

<sup>viii</sup> Reconnecting America, Center for Transit-Oriented Development. "Realizing the Potential - Expanding Housing Opportunities Near Transit," April 2007

<sup>ix</sup> California Energy Commission, PLACE<sup>3</sup>S, 1996

<sup>x</sup> <http://www.dec.ny.gov/chemical/8979.html>

LETTER B2

**Mountain Area Preservation Foundation**

**John Eaton, President**

**January 4, 2009**

*Note: The comments presented in this letter do not specifically address the adequacy of the Draft EIR; rather they generally present ideas related to the project's merits and opportunities to make the project even better. The Town may consider these ideas as it deliberates adoption of the Master Plan and/or subsequent development approvals. The responses below are general and intended to provide context to the comments provided.*

Response B2-1: The commenter's support for the project and list of goals for the Master Plan Area are noted.

Response B2-2: Whether the US transportation system will see a dramatic reduction in auto use over coming years is currently a subject of much controversy. For example, *Two Billion Cars: Driving Toward Sustainability* (Daniel Sperling and Deborah Gordon, 2008) argues that the large majority of travel will still occur via private vehicles in the future, just powered by alternative or hybrid fuel sources. Given the high degree of uncertainty regarding future transportation, the expected growth in population in Truckee as well as the growth in population State-wide, a CEQA document that assumes a dramatic decline in auto use rates would not be defensible. It should also be noted that the changes in the Downtown roadway network associated with the project (and with future non-project growth in traffic) are relatively limited and that most of the cost of these improvements would be associated with traffic signals at the Bridge/Donner Pass Road and Bridge/West River Street intersections, which would aid in pedestrian safety. The Downtown roadway improvements have been specifically limited, in part to maintain a high quality pedestrian environment.

Response B2-3: The Truckee area has a Transportation Management Association, the Truckee-North Tahoe Transportation Management Association, which has been an effective force in enhancing alternative transportation strategies since its formation in 1991. Its offices are in Tahoe City. The commenter's ideas related to establishing a separate TMA for the Master Plan Area are noteworthy; however, creating a separate TMA would likely dissipate regional efforts.

Response B2-4: The commenter is correct in stating that increasing structured parking on the Railyard site as a replacement for surface parking

could improve the overall pedestrian environment and urban design. Foregoing impact fees, however, would result in fewer funds available for transportation projects on the impact fee program list, possibly delaying other beneficial transportation improvements. It would also raise issues of equity between the Railyard project and other land use development projects that have not been provided with this flexibility.

Response B2-5: Providing a safe and pleasant path of travel from the Master Plan Area to existing Downtown businesses is a critical component of the Master Plan, and the idea to close Church Street on a permanent basis, as suggested by the commenter has been considered. The sidewalks along Donner Pass Road and Donner Pass Road Extension identified in the Master Plan would provide a safe and pleasant route between the project site and existing Downtown Truckee. The closure of Church Street on a permanent basis would shift a substantial amount of traffic to the parallel Jibboom Street, Keiser Avenue and E Street roadways to the north. These are relatively narrow roadways with sharp-angled intersections. In particular, closure of Church Street would increase eastbound traffic on Keiser Avenue at Donner Pass Road, which would be a potential safety concern. Temporary closure of Church Street may be possible, but this street segment is outside of the Plan area. It should also be noted that Church Street serves a variety of commercial, institutional and residential uses, access to which would need to be maintained.

Response B2-6: Although not related to the adequacy of the EIR, the commenter proposes an interesting idea regarding the elimination of parking standards to allow the market to dictate the quantity of parking provided. Eliminating minimum parking requirements for the Railyard project would be a substantial change in Town policy, and would likely raise significant community concern. The issue of elimination of minimum parking requirements is best addressed as part of a Downtown or town-wide planning process, in order to ensure that this substantial benefit to individual developers is addressed in an equitable and comprehensive manner. Action Item 7.1 of the Truckee Railyard Master Plan states "Incorporate parking in the Master Plan Area into the existing Downtown Commercial Core Parking Management Program." This will ensure that Railyard parking will be coordinated with the remainder of Downtown.

Response B2-7: The commenter's support for the project's sensitivity to pedestrians is noted.

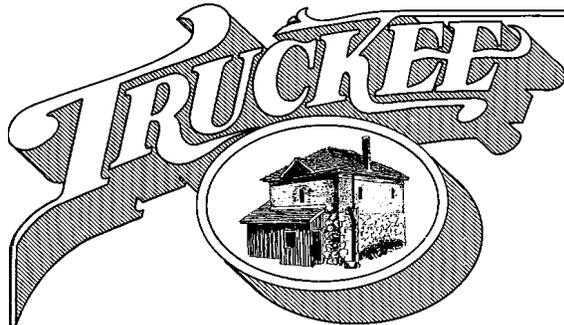
- Response B2-8: This comment recommends a lane or public use trail at Trout Creek, a concept which is already incorporated into the Draft Master Plan. This comment does not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.
- Response B2-9: These comments exhibit support for increased density along Trout Creek, timing and placement of specific types of retail and commercial uses within the plan area. These comments do not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.
- Response B2-10: This comment relates to the maintenance of walkways and trails. This comment does not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.
- Response B2-11: As stated in Section III.C., Project Objectives, on page 43 of the Draft EIR, sustainability is one of the objectives of the Truckee Railyard Draft Master Plan and is incorporated throughout the project. For example, development of high density housing Downtown is encouraged; the design of new buildings is required to accommodate solar access along public streets and in public places; and the use of Low Impact Development principles for stormwater treatment and retention is required. Refer to Section IV.D, Air Quality, for a discussion on greenhouse gas emissions and global climate change. This comment does not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.
- Response B2-12: The Draft Master Plan includes solar access design guidelines in Chapter 5, Development Standards and Guidelines. This comment does not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.
- Response B2-13: The Truckee Railyard Master Plan is participating in the LEED ND pilot project program. Also, as mentioned above, there are also specific policies within the Master Plan itself related to sustainable design and development. For example, development of high density housing Downtown is encouraged; the design of new buildings is required to accommodate solar access along public streets and in public places; and the use of Low Impact Development principles for stormwater

treatment and retention is required. This comment does not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.

Response B2-14: This comment discusses an inventory of environmental resources and does not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.

Response B2-15: This comment recommends the establishment of a mutually beneficial nonprofit to promote green behavior within the plan area. The Draft Master Plan does not propose such a plan; however, the project would be subject to the Town of Truckee's existing Green Building and Solid Waste and Recycling programs. This comment does not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.

Response B2-16: This comment discusses Proposition IC Funding. This comment does not relate to the adequacy of the Draft EIR analysis. The comment will be considered by the Town during deliberations on the project's merits and requested Town approvals.



**TRUCKEE-DONNER  
HISTORICAL SOCIETY, INC.**

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TO:  
Denyelle Nishimori, Associate Planner  
Truckee Community Development Department  
10183 Truckee Airport Road  
Truckee, Ca 96161

FROM:  
Board of Directors  
Truckee Donner Historical Society  
P.O. Box 893  
Truckee, Ca. 96160

RE: Truckee Railyard Master Plan Draft EIR response.

The Truckee Donner Historical Society has reviewed the Cultural Resources section of the Railyard Master Plan Draft EIR and would like to have the following comments entered as our official response.

In general we feel the Cultural Resources report is adequate for the proposed project, with one major exception. Most of the proposed project appears to comply with the Truckee Town General Plan policy goals as set forth in CC-18 & 19, and the Town's Historic Preservation Program.

We would like to remind staff of the Town Council's November 20<sup>th</sup> statement of support for Truckee History and Historic Preservation that came out of discussions on the Trout Creek sheds, and the need to follow the established process and put more emphasis on following HPAC's recommendation.

We continue to have some concerns regarding the potential adverse economic impacts on the viability of Commercial Row, concurrent with Downtown Redevelopment and look forward to reviewing and possibly commenting on the soon to be released separate economic study of the Railyard and its impacts on Historic Downtown. It will require a lot of faith in the Developer/Town partnership to ensure that the Railyard Development has the positive impact the EIR envisions. We also expect the separate, but coordinated Trout Creek Restoration Project, with its Negative Declaration EIR status to follow the same Cultural Resources protection as the Railyard project, as stated at the December 18<sup>th</sup> Town Council EIR hearing.

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We are satisfied with proposed CULT-Mitigation Measures 2a, 2b, 3, and 4, that appear to reduce the impacts to less than significant. The one impact we are not in agreement with is the proposed demolition of the Union Pacific Warehouse and the proposed CULT-Mitigation Measure 1.

4

We request that an alternative be studied that would align Donner Pass Road to allow the survival of the Union Pacific Warehouse; a building with a “B” rating on the Historic Inventory and one that HPAC is in support of preserving. We feel that saving a historic railroad building should be a priority, both for the Town and the developer.

If preservation is not an option, a serious study of relocation to an on site, historically appropriate location needs to be conducted. If relocation is not practical, careful deconstruction and reuse of historic building materials should be required and properly documented on an appropriate new building.

5

If there is no alternative but to demolish the former Southern Pacific car repair shop, probably constructed in 1903, the proposed mitigation appears to be woefully insufficient for such an obvious unmitigated impact. Therefore we request additional mitigation in the form of increased support for Historical displays, such as the Railroad Museum, in the proposed Railyard project.

LETTER B3

**Truckee Donner Historical Society. Inc**

**January 5, 2009**

Response B3-1: The commenter's statement that the cultural resource report is adequate, with one exception related to the demolition of the Union Pacific Warehouse building, is noted.

The Town received three responses to the Request for Proposals prepared for the reuse of the sheds on Trout Creek, one from a Truckee community member, one from the Truckee Donner Historical Society and one from Truckee Donner Associates (TDA, Railyard Master Plan project applicant). The Town Council reviewed the proposals at their meeting on February 5, 2009 and accepted TDA's proposal to remove the sheds from their current location and reuse the materials within the development of the Railyard Master Plan Area.

Response B3-2: The Economic Impact Analysis was published on January 2, 2009 and a dual-dias meeting with Planning Commission and Town Council was held on January 20, 2009. The Town did not receive comments from Truckee Donner Historic Society on the Economic Impact Analysis.

Response B3-3: The Draft EIR considered the potential impacts to nearby resources including Commercial Row (see pages 340 to 343). Additionally, the Economic Impact Analysis prepared for the Railyard Master Plan (see Appendix A) further supports the findings of the Draft EIR. Also see Response to Comment B4-13.

Response B3-4: The commenter's concurrence with some of the mitigation measures in the Draft EIR is noted. The commenter's concern for the mitigation measure related to the Union Pacific Warehouse building is addressed below, see Response to Comment B3-5.

Response B3-5: On page 425, the Draft EIR includes the Maintain Donner Pass Road alternative that addressed the concept of maintaining the alignment of Donner Pass Road. This alternative would allow the Warehouse to remain, thereby avoiding its removal and reducing the potential impacts to cultural resources to a less-than-significant level. Because of its environmental merits, this alternative was identified as the second most environmentally superior alternative behind the No Project/No Build alternative.

The project developer explored the technical and financial feasibility of moving the warehouse with the assistance of a local contractor experienced in historic building rehabilitation and relocation. However, it was determined that moving the building was not feasible due to its age, structural composition, and condition. Even if the warehouse were moved, it is not clear that it would retain its status as a historical resource under CEQA. Although the Warehouse possesses few decorative architectural elements, some of the historic fabric could be considered for re-use on the project buildings. The Draft EIR text on page 344 has been revised as follows to clarify this requirement:

**Impact CULT-1: Implementation of the Master Plan will result in demolition of the Union Pacific Railroad Warehouse, an architectural resource that meets the definition of historical resources under CEQA. (S)**

The applicant has investigated the possibility of moving the warehouse to a new location within the Railyard. However, based on the professional opinion of a consulting historic building contractor, it was determined that moving the building was infeasible due to its age, structural composition, and condition. Although moving the building is not possible, the following mitigation measures shall be implemented prior to its demolition to minimize impacts related to this historic resource.

Mitigation Measure CULT-1: Prior to issuance of any demolition permits for the affected properties, the applicant shall prepare architectural documentation of the Union Pacific Railroad Warehouse minimizing the environmental impact of this building's loss. The documentation shall be done to Historic American Buildings Survey (HABS) Level III or higher standards, according to the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation: HABS/HAER Standards*.<sup>5</sup> The applicant shall also, during the project's preliminary design phase, consider the re-use of historic fabric in project buildings (e.g., the lapped wood siding on the north and east elevations or the tongue-and-groove siding on the south and west elevations).

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<sup>5</sup> National Park Service, 1990. *Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines*. Website: [http://www.nps.gov/history/local-law/arch\\_stnds\\_6.htm](http://www.nps.gov/history/local-law/arch_stnds_6.htm).

The inclusion of a railroad museum is not an approved land use in the Master Plan Area at this time, and it is not adequately demonstrated that the provision of funds for a museum would mitigate for the loss of a historical resource. The purposes served by a railroad museum, though laudable, do not appear to qualify as any of the five types of mitigation: (1) *avoiding* the impact altogether by not taking a certain action or parts of an action; (2) *minimizing* impacts by limiting the degree or magnitude of the action and its implementation; (3) *rectifying* the impact by repairing, rehabilitating, or restoring the impacted environment; (4) *reducing or eliminating* the impact over time by preservation and maintenance operations during the life of the action; and (5) *compensating* for the impact by replacing or providing substitute resources or environments (*CEQA Guidelines* §15370). It appears that the museum would provide a more generalized public benefit rather than address the specific impact resulting from the loss of a historical resource, and it would not provide “substitute resources or environments.” It also does not appear that the funding of a museum would be proportional to the extent of the project’s impact.