

County of Nevada  
Planning Division c/o Patrick Dobbs  
950 Maidu Avenue  
Nevada City, California 95959

March 25, 2016

*RE: Tahoe Donner Trails 5YIPlan – Response to Incomplete Letter*

Hello Patrick,

Please find below and attached our response to your February 26, 2016 incomplete letter relating to the Tahoe Donner Trails Five-Year Implementation Plan (5YIPlan) formally submitted to the County of Nevada on January 28, 2016. This response is intended to provide the answers and supporting information to the two specific incomplete items contained in your letter as well as the directly-related request for floodplain clarity from the SRWQCB, Lahontan Region. As a result, we anticipate that the project submittal will be formally deemed complete and that the environmental review process by the County as the Lead Agency pursuant to CEQA and CEQA Guidelines will be initiated.

### **Project Assessor's Parcel Numbers**

All of the APN's you reference in your letter are accurate and applicable to the 5YIPlan proposal, but I did identify four additional APN's that should be included in this list: 46-250-01, 03 and 04 (associated with Project 10) and 46-470-06 (associated with Project 22). All of these parcels are owned by the Tahoe Donner Association, designated and utilized as recreational lands, and collectively represent all of the lands associated with the 5YIPlan.

### **Floodplain(s) Clarity**

*S. Prosser Creek (County – Proposed Projects 1 and 2)*

The attached technical memo from Balance Hydrologics of our project team outlines their assessment and conclusion of the S. Prosser Creek floodplain and its relationship with proposed 5YIPlan Project 1 (existing dirt roadway proposed for improvement) and Project 2 (proposed new trail). Because the specific Flood Insurance Rate Map applicable to the Euer Valley contains only roughly mapped and quantified limits of the S. Prosser Creek floodplain, this assessment provides a more accurate picture of the project(s):floodplain relationship and the clear conclusion that both projects are located well outside of the S. Prosser Creek floodplain. As noted within the memo, the two projects maintain a 22'–30' vertical separation above the floodplain and therefore neither is subject to either the County's Floodplain Management Regulations or the Basin Plan floodplain prohibitions of the SRWQCB, Lahontan Region.

*Alder Creek & Trout Creek (Town – Proposed Projects 17, 19, 20 and 21)*

Unlike that for S. Prosser Creek as described above, the floodplain limits of neither Alder Creek nor Trout Creek have been mapped by FEMA. The limits of these two floodplains have been roughly delineated by Balance Hydrologics (see their January 2016 report, Figure 4), supporting and confirming the field-observed condition of the associated four existing trails (or a portion thereof) to be within their respective

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floodplain. As such, these four projects appear to be subject to the Town’s Floodplain Management Regulations as well as likely necessitating the grant of a Basin Plan floodplain prohibition exemption from the SRWQCB, Lahontan Region (see below), prior to their respective implementation. Each of these four projects involve improvement to long-existing trails in terms of both water quality and quantity, resulting in a net improvement to their respective floodplain function and therefore reasonably expected to be supported through the local, state and federal regulatory processes.

As a component of any given subsequent local, state or federal permitting that may be necessary, it is recognized that some level of additional hydrologic floodplain analysis may be needed to support a finding of net floodplain function improvement and/or, as an example, to establish the finished structure elevations of the two boardwalk/bridge replacement improvements associated with proposed Project 19. It is expected that this clarity would be provided as a result of this 5YIPlan review process and any related subsequent need for further analysis or supporting documentation be made a condition of approval for the 5YIPlan.

**Agency & Department Comments**

I did not identify any agency and/or department comment that was either problematic or warranting a formal response, but please let me know if you need anything from me in this regard. Your reference to ‘potential conditions of approval’ is a reasonable and expected outcome of the project review process to ensure consistency with these agencies requirements (or, in some cases, suggestions for mitigation). Similarly, these ‘recommendations for the project’s overall design’ largely align with the intent and specific project details contained within the 5YIPlan proposal in outlining the overall improvement to the larger trail system and the more-specific design and construction details to insure its sustainability over time.

**Town-County Project Number Reference**

Informally, the Town of Truckee staff made a suggestion that the 5YIPlan include reference to the proposed trail projects located in the Town versus those located in the County (and, in some instances, both) for ease of reference beyond that included in 5YIPlan Appendix 5, *Entitlement Matrix*. Ultimately, this effort can be pursued as part of any future 5YIPlan revision that may be warranted or suggested, but for the purpose of efficiency and minimizing revisions to the larger document, in the interim below is a listing of the proposed Town / County / Both projects for quick reference:

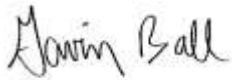
| Project Number | Town | County | Both |
|----------------|------|--------|------|
| 1              |      | x      |      |
| 2              |      | x      |      |
| 3              |      | x      |      |
| 4              |      | x      |      |
| 5              |      | x      |      |
| 6              |      | x      |      |
| 7              |      | x      |      |
| 8              |      | x      |      |

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| Project Number | Town | County | Both |
|----------------|------|--------|------|
| 9              |      | x      |      |
| 10             |      |        | x    |
| 11             |      | x      |      |
| 12             |      | x      |      |
| 13             |      |        | x    |
| 14             |      |        | x    |
| 15             |      | x      |      |
| 16             |      |        | x    |
| 17             | x    |        |      |
| 18             | x    |        |      |
| 19             | x    |        |      |
| 20             | x    |        |      |
| 21             | x    |        |      |
| 22             | x    |        |      |

Please let me know if I can provide any additional information or clarification on behalf of the Tahoe Donner Association in support of the proposed 5YIPlan or the County's initiation of the CEQA process.

Sincerely,



Gavin Ball, Planning Consultant / TDA Agent

Attachment: Balance Hydrologics, Inc. Technical Memo dated March 24, 2016

Cc: Forrest Huisman, TDA Director of Capital Projects

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