

# Serene Lakes Property Owners Association, Inc. (SLPOA)



PO BOX 669, SODA SPRINGS, CALIFORNIA 95728



(530) 426-0802



(530) 426-1675



adminasst@slpoa.com

Crystal Jacobsen  
Placer County Planning Dept.  
3091 County Center Drive  
Auburn, CA 95603

Dear Ms Jacobsen,

Royal Gorge/Foster-Syme will be meeting with you for their pre-development meeting on June 5 after which you have said the County will develop a checklist of items to be covered in their formal application sometime later.

The Serene Lakes Property Owners' Association is, of course, concerned with any development that will occur in Serene Lakes and on Donner Summit. The Foster/Syme development has been the focus of a number of community and committee meetings, a community survey, much communication, and much conversation. We have first analyzed what is proposed, considered what is on Donner Summit both man-made and natural, and looked at the unique aspects of Donner Summit. Because we have a more specific knowledge of the area than many in your planning department, we have developed a preliminary list of topics that should be addressed in the pre-development checklist and also in the draft and final environmental impact reports (EIR's) in compliance with the California Environmental Quality Act (CEQA).

We hope that our list will be useful to your department in developing the checklist for the developers to identify clearly issues that must be examined in detail at this early stage of the planning process.

We will look forward to getting copies of what you develop as well as the Foster/Syme preliminary plans. We also look forward to participating in your "scoping" sessions and so request that any "scoping" sessions be public. Since we have already requested notification of Serene Lakes and Donner Summit development activities such as meetings, communications, public hearings, and environmental documents, we will expect to be able to keep apprised of important developments.

If you have any questions please feel free to contact me using any of the contact points in the letterhead above or via email or phone ([slpoa@oudegeest.com](mailto:slpoa@oudegeest.com) 209-606-6859).

Thank you for your time and consideration.

Sincerely,

Bill Oudegeest, President  
Serene Lakes Property Owners' Association



[www.slpoa.com](http://www.slpoa.com)

Tuesday, May 29, 2007

## **REGIONAL ENVIRONMENTAL AND HABITAT CONCERNS & IMPACT ON ADJACENT CONSERVATION AND SENSITIVE AREAS**

- a. Recent biological resource assessments and wetlands delineation studies presented to regional environmental groups only deal with the property owned by Foster/Syme and do not consider or inventory adjacent regional environmental resources that could be impacted by development.
- b. The proposed development is immediately adjacent to three particularly fragile alpine environments: Van Norden Meadow, the North Fork of the American River Research and Conservation Center, and the Onion Creek Experimental Forest.
- c. The North Fork American River is a federal and state designated "National Wild and Scenic River" and the South Yuba River is a state designated "California Wild and Scenic River." Runoff from this project will impact the watersheds of the North Fork of the American River and the South Yuba River, both carrying the federal designation of "Wild and Scenic."

The connectivity issues between this development and fragile neighboring habitats (including wildlife migration corridors and old growth forest habitats) are extremely complex. It would be very easy for a development of this magnitude to have significant unintended consequences which can not be foreseen.

The proposed development is immediately adjacent to several particularly fragile mountain environments such as the Van Norden Meadow, the Onion Creek Experimental Forest, and the North Fork of the American River Research and Conservation Area.

In addition, the North Fork American River is a federal and state designated "National Wild and Scenic River" and the South Yuba River is a state designated "California Wild and Scenic River". Any pollution and erosion from this project (such as car drippings and silty erosion carried in storm waters) will flow into Ice Lakes and Ice Lakes Creek (aka Serena Creek) which is a major tributary to the North Fork American River. "The heart of the Act... Section 7... prohibits federal agencies from assisting by loan, grant, license, or otherwise the construction of water resources projects that would directly and adversely affect the free flowing condition and outstanding values of designated rivers. This section also permits licensing of or assistance to water resources projects that may be located above, below, or on a tributary of a designated river, as long as the project does not invade the river area or unreasonably diminish its values." "Section 10 of the Act requires federal agencies to manage designated rivers to protect and enhance the free flowing condition and outstanding values for which the river was designated.... Federal agency administration to protect the free flowing condition and outstanding values of designated rivers shall emphasize the protection of the river's esthetic, scenic, historic, archeological, and scientific features." Further, "agencies of the State of California may not assist local, state, and federal agencies in the planning and construction of any dam, reservoir, diversion, or other water impoundment facility that could adversely affect the free-flowing condition and natural character of river segments included in the system (Sec. 5093.56) or of rivers otherwise protected under the Act (Secs. 5093.542, 5093.70)." Any water resources project which restricts water flowing down Ice Lakes Creek into the North Fork American River or diminishes the outstanding values of the North Fork American River via pollution and increased sediment in the water will not be permitted at the federal or state level. All citations are taken from <http://www.friendsoftheriver.org>.

If the number of residents and visitors on the summit increases by a significant number and their recreational activities are spread throughout Foster/Syme lands, this large population will "shock" the current wilderness and wildlife habitats. Results will be:

- cigarettes and camp fires leading to wild fires
- pollution of the Serene Lakes water reservoirs
- littering
- noise pollution
- light pollution
- wildlife disturbance.

The impact of large scale construction and development with the resulting grading, compaction, and cover will significantly affect current precipitation drainage patterns. Currently precipitation falls on and is stored on the mountainsides. During spring the snow melt is predominantly absorbed into the ground and moves to the lakes. From there it becomes the headwaters of the North Fork of the American River.

Grading, compaction, and cover will alter that flow and change the timing of the flow. The results are unpredictable. Relatively little of the snowmelt goes via streams and drainage channels until it gets close to the lakes.

Finally, the ecological inter-dependencies between Donner Summit where the Foster/Syme development is proposed and the fragile neighboring habitats (wildlife migration corridors, old growth forest habitats, special status species, Wild and Scenic rivers) are complex. A large development will likely have unforeseen environmental consequences in the neighboring habitats.

### **TO MEET THE DEVELOPMENT'S NEEDS FOR WATER, FOSTER/SYME PROPOSES TO CONVERT SERENE LAKES INTO A FULL FLEDGED WORKING RESERVOIR.**

- a. The massiveness of the proposed development is reflected in its requirements for water, which have been estimated at 235 acre-feet per year (not including another 30 A.F. for snowmaking). This figure is roughly twice the amount used by the existing Serene Lakes community which is approximately 80% built-out and only partially occupied at this time.
- b. The developers have presented to the Sierra Lakes County Water District (SLCWD) their plan to dredge Serene Lakes to increase its capacity and turn it into a reservoir. Roughly half the shoreline is to be dug out from its historic, natural ramp to an artificially steep ramp.
- c. During the annual dry season, when water is not flowing over the top of the lake's dam, the lake will be drawn down by 4.8 feet or more to provide water for the development. This will transform a pristine mountain lake, a gem of Donner Summit, into an ugly artificial storage basin with barren sloping walls leading down to the water's edge – not unlike the unfortunate spectacle of Lake Shasta.
- d. Because the two major portions of the lake are connected by a relatively shallow strait, this strait would also have to be excavated into a steep-walled trench to keep the two portions connected over the course of the season.
- e. In addition to destroying the aesthetics of the lake, this proposal would significantly reduce its attractiveness as a recreational area and would harmfully impact the fish population of the lake.
- f. The rising and falling of the lake level could have detrimental impacts on the large numbers of trees lining the edge of the lake and could damage the foundations of lakeside homes, as the seasonal ground conditions fluctuate from very wet to very dry.
- g. The proposal to SLCWD provides no consideration for the needs of the existing community as it continues to be built out and its needs for water increase in the future. Preliminary estimates indicate that current property owners will need the full capacity of the existing Serene Lakes system (in its current form) to meet their own requirements in the coming years as the nature of the community continues to change from part time to full time residents.

If water consumption of a significantly larger summit population draws down the levels of Ice Lakes each summer beyond the natural variation, this process will have adverse consequences on both the aquatic wildlife habitat as well as the stability of the structures of the neighboring homes. Amplified fluctuation of lake levels (for example, by more than the difference that is currently the natural seasonal variation) will:

- a. Negatively impact fish and other aquatic animals which cannot deal well with fluctuating lake levels or changing water temperatures.
- b. Likely affect the levels of the very-near-surface water table underneath all the lakeside homes. If the soils under these homes fluctuate from saturated to dryer each year, this will create movement of the soil under foundations and an undermining of the stability of the foundations and structures.
- c. Create more wetlands / marshy areas around the circumference of the lakes and exacerbate mosquito problems (already the mosquito population is heavy in the summer).
- d. Dewater Ice Lakes Creek (AKA Serena Creek) causing harm to this perennial stream that is currently considered a Class I trout stream by the California Department of Fish and Game as well as impacting the "National Wild & Scenic" North Fork of the American River via

restricted water flow from the Ice Lakes Creek major tributary.

- e. Decrease property values for all summit homeowners as the levels and quality of the lakes degrade.

## **WATER POLLUTION, EROSION AND RUNOFF**

Lake Serena is a natural lake that serves as the reservoir for the Sierra Lakes Water District. By locating a high density, large population so close to Lake Dulzura (its waters are confluent with Lake Serena) and by the Foster/Syme Development openly facilitating the dramatic increase in the recreational use of the lakes, pollution and fouling of the waters are almost inevitable. To date, Foster/Syme have not provided any details of their plans for sewage disposal, or the capacity of the current system to serve the increased demand

- a. For the proposed Ski Camp, which is in the watershed for our lakes, our water supply, and a major watershed into the North Fork of the American River Research and Conservation Area and the “National Wild and Scenic” North Fork American River, the current plans anticipate the destruction of about 75 acres of forest for residences, condos, hotels, parking lots, ski lifts and ski runs.
- b. The ski lifts and ski runs, in addition to permanently scarring a scenic ridge of forested slopes (please visit the denuded slopes of Sugar Bowl during the summer), would result in a dramatic increase in hillside erosion during storms and the spring snowmelt.
- c. The resulting sources of pollution (car drippings, dog droppings, soil erosion) will not be absorbed by the forest, but will flow directly into storm sewers that feed into our lake water supply and the American River watershed.
- d. This will compromise the quality of our water supply and the American River. It will also accelerate the filling of our lakes with silt, prematurely turning them into meadows.

One great risk of pollution of Ice Lakes is from car drippings onto new roads and new driveways. If the population on the summit increases by a multiple or more and thus the number of automobiles is also multiplied, water pollution of Ice Lakes will inevitably occur as storm runoff carrying car drippings (as well as dog droppings and litter) are flushed into the lakes. Ice Lakes Creek (aka Serena Creek) flowing out of Ice Lakes is a major tributary to the North Fork of the American River. Any pollution of Ice Lakes will contaminate the North Fork of the American River which is designated a “Wild and Scenic River”.

Possible additional sources of water pollution of the lakes are (a) increased use of fertilizers that will run-off into lakes (which, coupled with lake fluctuations, will likely cause increased algae growth) and (b) soils erosion from new ski runs and other graded areas.

During heavy storms and the spring thaw, the 75 acres of clear-cut forest will no longer absorb the large amounts of rainfall and snowmelt. The resulting water will flow off denuded forest and manmade surfaces into storm drains emptying directly into the lakes. Without a doubt, this will magnify substantially the current problems we experience with seasonal flooding, and possibly eutrophication of Serena and Dulzura Lakes.

## **RISKS OF DREDGING TO LAKE INTEGRITY**

Probably the single biggest danger to Ice Lakes is that any dredging risks removing the soils laid down by ages which prevent the lakes from draining into the granite substrate. If anyone starts digging into this, the result may be to create a hole, or many holes, through which all the water will quickly and irrecoverably siphon.

Dredging of the lakes will affect the slopes of the lake sides, both underneath the lakes as well as surrounding the lakes. If the angle of slopes are increased in steepness (even in some places), slope erosion will occur until the slope angles reach natural equilibrium again. Thus, there will be a repeated process necessary of: dredging to remove the accumulated eroded soil, erosion where artificial slopes have been dredged, infilling of the dredged areas with eroded soil, and dredging again. The net effect will be the eventual erosion of the soils on the lake perimeter and the undermining of the soil underneath the lake-front homes. If the land is undermined underneath the lake front homes then the structure of those homes will be undermined with foundations possible fracturing.

## **DREDGING EFFECTS – DREDGING MATERIAL REMOVAL**

Another aspect of dredging is the disposal of the dredging materials and the resulting effects on the quality of water. At first that seems inconsequential, but in the lake bottom are a lot of partly decomposed materials. They are sequestered now, but what will happen when that is all stirred up by the dredging and is that dredged material safe to be deposited on the forest floor somewhere nearby?

The dredged materials will need to be hauled somewhere. 60 AF of dredging material will require approximately 9,6800 truckloads (43,560 sq ft = one acre which is 4,840 sq yards. At 1 foot depth that is 1,613 cubic yards. 160 truck loads per AF. 60 AF would be 5376 truck loads or 64 trucks per day during the short dredging season on Donner Summit. That's 8 trucks per hour or one every 7 minutes.)

How can the trucking of the dredging materials be mitigated appropriately for a residential community?

## **RESTRICTING FLOW DOWN ICE LAKES CREEK (AKA SERENA CREEK)**

Dewatering Ice Lakes Creek (aka Serena Creek) in the summer to provide more water to the Foster/Syme development would cause harm to this perennial stream that is currently considered a Class I trout stream by the California Department of Fish and Game and a major tributary to the "National Wild & Scenic" North Fork of the American River. The lower reaches of this creek flow year-round, even in drought years, but that may not be the case if all the flows from Ice Lakes are captured at any time and diverted elsewhere. The affects on trout and other aquatic species that depend on this free-flowing creek apparently have not been considered by the developers.

Ice Lakes Creek does go underground for a mile or so below Ice Lakes in dry years and late summer. It is clearly a perennial stream for the lower several miles and supports aquatic life in the Onion Creek Experimental Forest and the North Fork of the American River Research and Conservation Area.

In addition, the North Fork American River is a federal and state designated "National Wild and Scenic River" and the South Yuba River is a state designated "California Wild and Scenic River." Any water resources project which restricts water flowing down Ice Lakes Creek into the North Fork American River or diminishes the outstanding values of the North Fork American River via restricted water flow from tributaries, pollution and increased sediment in the water will not be permitted at the federal or state level.

## **SEWAGE DISPOSAL**

To date, Foster/Syme has not provided any details of their plans for sewage disposal, or the capacity of the current system to serve the increased demand.

## **EROSION & SCARRING**

Pt. Mariah and its ridgeline boast one of the most spectacular views in the area. Currently this ridge is very accessible to hikers, snow-shoers, and cross-country skiers with no scarring visible from Serene Lakes. No man-induced erosion is apparent in the summertime. It is almost impossible to clear-cut the wide trails needed for downhill skiing without creating visible scars. Also, creating a wider and smoother trail on the ridgeline will expose the ridge to accelerated erosion. If this man-induced erosion gains momentum, there will be mud/rock slides, increased scars on both sides of the ridge, and sediment clouding the streams leading to a "muddy" pollution and impact on soils, plants, and animals—including a number of special-status species.

## **NOISE POLLUTION & TRESPASSING**

On the weekends in the height of the winter and summer seasons, the recreational use of Lakes Dulzura and Serena is quite substantial (cross-country skiers, snow-shoers and dogs in winter; boats in the summer). These are two very small sub-alpine lakes that are already reaching the limits of their recreational capacity under existing conditions, let alone hundreds or thousands of new users. Noise, disregard for the homeowners, and trespassing are already prevalent problems.

There are very few public access points, thus residents and tenants not situated on the lake trespass to get to the lake by walking between the lakeside homes. Even when asked not to trespass, they continue to do so. Noise pollution (loud revelry, yelling to others at a distance across the lake, bonfires by the lake, etc.) is a problem. On Lake Tahoe, there are separate areas for public access and enjoyment. And Lake Tahoe is large enough that boaters can travel significant distances from the homes keeping public recreation and

residential living appropriately separate. On Lakes Dulzura and Serena there is no such physical separation of public recreation and residential living. Thus, the two must coexist in a mutually amicable and respectful manner. If the number of residents and tenants dramatically increases on the summit, these two little lakes will bear the burden of greatly increased public recreational use. Noise will significantly increase. Trespassing will significantly increase. Calls to the sheriff will significantly increase as neighboring homeowners seek legal action to defend their civil rights.

## **TRAFFIC CIRCULATION, ACCIDENTS, EVACUATION IN THE EVENT OF FOREST FIRES**

### **CONGESTION & ACCIDENTS ON HIGHWAY 80 & OLD HIGHWAY 40**

Highway 80 and Old Highway 40 are already very congested on most weekends and during snow storms. The additional 1000's of people living in the 1010 new residences (with multiple owners of some or possibly most of the condos and not including hotels or commercial space) would increase the current population on the summit by a multiple. This will increase congestion on I-80, and 40 under existing conditions, the intersection with the Baker Ranch-Soda Springs Road at the light is already rated at "Level F," (meaning that it flunks); hundreds of more vehicles will only increase an already bad traffic situation and probably will lead to more accidents, especially in winter.

The single ingress/egress of the community and the intersection at Old 40 are simply inadequate to handle peak local traffic, as magnified by day-use traffic from Royal Gorge, the Ice Lakes Lodge, Soda Springs Resort, Sugar Bowl and Donner Ski Ranch.

### **CONGESTION & COLLISIONS BETWEEN CARS AND PEDESTRIANS ON THE SUMMIT (INCREASED USE OF STREETS BY BOTH MOTORISTS AND WALKERS, RESULTING IN ACCIDENTS AND INJURIES)**

60-65% of the residential units in the Foster/Syme proposed development will be "fractional" / "timeshare" ownership concentrated in Ski Camp "village" near Ice Lakes Lodge and adjacent to Serene Lakes. These units will dramatically increase the population on the summit by a multiple, bringing a commensurate congestion of motorists and pedestrians/walkers on all streets, particularly near Ski Camp. Congestion brings moving violations, accidents and injuries. Witness how quickly cars seek to travel by Soda Springs ski area even while skiers are walking beside the road and even crossing the road –children in hand. On weekends there is a similar problem of cars traveling too fast on Serene Lakes streets where families are walking with children. Neither the cars nor the walkers express much concern for the other. It is a matter of time before someone gets hit by a car and seriously injured or killed.

## **TRAFFIC AND VEHICULAR CONGESTION**

- a. The proposed development will more than triple our traffic levels and greatly worsen the existing traffic problems we currently suffer. With large numbers of people entering and exiting the community at predictable peak times (Friday evenings, Saturday afternoons, Sunday afternoons), the gridlock problems we already experience will escalate exponentially.
- b. Sugar Bowl has already stopped running a shuttle bus to their resort, because the traffic congestion problem makes it impossible for them to offer prompt and reliable service. The Ski Camp's objective of providing easier access to Sugar Bowl during skiing hours will, as a consequence, massively worsen the problem during peak traffic hours.
- c. Foster/Syme have proposed no fundamental mitigation for this problem. Their planned overpass at the railroad crossing will only avoid occasional blockages by stopped trains. They do not provide a second ingress/egress or address in any meaningful way the gridlock already caused by existing commercial development.
- d. At minimum, there needs to be a requirement for a traffic light at the intersection of Soda Springs Road and Old 40 (where there is already a flashing light), plus a 4-lane road out to I-80, which is already above capacity on busy weekends
- e. It is our understanding that County Planning (under today's standards) would not approve the existing Serene Lakes development with a single ingress/egress. How can the County possibly allow a tripling of the traffic without more significant mitigation?

## **EVACUATION IN THE EVENT OF A FOREST FIRE**

A large population increase on the summit and surrounding areas will increase the risk of incidental fires from campfires and other human-caused sources of ignition. In the event of a large wildfire, the existing road system is inadequate for everyone to get out safely. Imagine what it would be like with thousands of more cars trying to leave the area at the same time. Foster/Syme is only planning a new bridge over the railroad and no new access point to I-80.

## **SERENE LAKES: A SMALL SUMMIT POPULATION**

### **FOSTER-SYME CONCEPT PLAN: A LARGE SUMMIT POPULATION**

Serene Lakes presently comprises about 800 single-family residences, no condominiums or hotels, and an extremely limited number of homes with multi-family ownership. The population is thus quite small, especially when averaged throughout the year. Most residents chose their second home (some their primary residence) because it is a small, isolated community surrounded by wilderness. The vast majority of Serene Lakes homeowners are wilderness-seekers. Most residents walk, hike, and/or cross-county ski.

The Foster/Syme concept plan is deceptive in that the developers want to focus attention on “camps” yet the project as of May 2007 comprises 1010 units (not counting hotel units and commercial space), of which 724 are condos with fractional ownership (e.g. “timeshares”) and 286 houses. What Foster/Syme does not call attention to is the vastly higher occupancy rates – and thus vastly higher summit population - relative to current Serene Lakes homeowners (due to how title will be held in many of those units (e.g., fractional ownership / timeshare) as well as hotels and other commercial development (swimming pools, ice rink, sports complex, wellness center, 11,000 sq ft restaurant, undefined ”placeholder” commercial/lodging/amenity) which will increase the summit population by likely multiples of the existing population . The Foster/Syme concept plan has identified the most beautiful wilderness areas near Ski Camp and Wilderness Camp to be transformed from wilderness with important conservation values to a resort.

The scale of the Foster/Syme condominium units alone compared to other large ski resort developments is noteworthy:

Squaw: 290 condo units

Northstar: 222 condo units

Ski Camp and other camps: 724 condo units plus hotel(s), 286 houses, swimming pools, ice rink, sports complex, wellness center, 11,000 sq ft restaurant, undefined ”placeholder” commercial/lodging/amenity

## **LARGE SCALE, HIGH DENSITY DEVELOPMENT IS INCONSISTENT AND INCOMPATIBLE WITH THE FRAGILE DONNER ALPINE DONNER SUMMIT AREA AND EXISTING COMMUNITY.**

- a. Over the past sixty years (since 1946) in Serene Lakes, development has been done in a manner to consciously respect and preserve this natural and fragile environment.
- b. Zoning has been overwhelmingly single-family residences. This has been the zoning that formed the basis for owners purchasing and improving their properties. It has provided the assurance property owners would not one day find next door a car wash, a water park, or a high-density resort complex.
- c. The proposed large-scale development (roughly twice the size of the Squaw Valley Village and three times the size of the new Northstar Village) in the small Serene Lakes basin is simply inappropriate and incompatible with the existing community with its established zoning and character.
- d. The estimated value of existing homes at Serene Lakes plus infrastructure investments (water, sewer, fire protection and community beach) exceeds \$700 million. Developers with an investment of merely \$50 million should not be allowed to redefine the community to the detriment of this unspoiled Sierra environment and existing property owners.

## **TIME SHARED/FRACTIONAL OWNERSHIP WILL AMPLIFY THE IMPACT OF DEVELOPMENT.**

Serene Lakes is currently a single-family vacation home community. Average residential use on an annual basis is well below 25%.

- a. Sales of time-shared/fractional ownership units will dramatically increase the utilization the proposed units, as compared to the existing community.
- b. Owners will want to use their property several times a year, and they will rent them to others when they cannot use them themselves (often to defer costs).
- c. The net impact (traffic, use of the lake, noise pollution, light pollution etc.) on the community for each time-share/fractional ownership unit will be two-to-three times the impact per existing residence in the community. Hence, although the proposed 1010 units at first glance look to more than double the size of the community, their net effect will more than triple the impact of people on in the fragile Donner Summit area. This does not include the proposed addition of hotel and commercial space.
- d. Moreover, this major expansion of short-term rental units will attract renters who have no stake in the community, don't know or wish to obey existing norms and rules of behavior, come as large groups to party and revel, and bring noisy recreational equipment (dirt bikes and snowmobiles) that are used in a manner at odds with the quiet nature of our summit community.

## **AIR QUALITY**

Impacts to air quality need be included on the Placer County Planning Department's project checklist for all projects occurring on Donner Summit, including Royal Gorge LLC. Furthermore, as projects continue through the CEQA processes, all air quality impacts must be addressed in any Draft and final Environmental Impact Reports. All air quality impacts shall be mitigated according to the Placer County Air Pollution Control District's threshold levels of significance and pertinent regulations.

1. A detailed air quality analysis of potential emissions (in pounds per day) from a project using a reasonable worst case scenario needs to be included in any Environmental Impact Report (EIR). A listing should be provided of the emissions increases anticipated from the project for the various categories of emissions sources by phases or project. A comparison should be made of the total emissions increases for PM10, reactive organic gases, nitrogen oxides and carbon monoxide to thresholds of significance. It is important that both short term and long term emission impacts are identified.

**During the construction phase, there are many short-term air quality impacts** from construction vehicles and earth moving. Emissions estimates in pounds per day should be provided for the following sources of pollution:

- A. Tailpipe emissions of particulate, carbon monoxide and nitrous oxide from diesel powered earth moving equipment.
- B. Particulate emissions from vehicular traffic on unpaved roads.
- C. Particulate emissions from soil disturbance. This estimate should be based upon how many acres are disturbed by earth moving equipment.

**Long-term or mobile source emissions** should be estimated using the latest CAPCOA/ARB-approved version of URBEMIS computer model. Emissions estimates should be provided in pounds per day and tons per year. If the traffic study for this project identifies any intersection(s) that would fall below a Level of Service D under this project alone or cumulative development scenarios, a detailed Caline 4 carbon monoxide analysis should be prepared. The traffic study should evaluate project alone and cumulative Level of Service impacts to such intersections. Additionally, particulate emissions from traffic on sanded, paved roads should be estimated.

2. A Setting and Background section should be included so that significance of the project and cumulative projects can be determined.

3. Qualitatively discuss the project's air quality impacts in relation to recently promulgated National Ambient Air Quality Standards for ozone and particulate matter (PM10 and PM2.5). What effect will this project have on the District's ability to meet these standards?
4. Identify meaningful mitigation measures that can be implemented to reduce short- and long-term air quality impacts. Qualitatively and quantitatively (when possible) evaluate the effectiveness of the mitigation measures that are proposed to reduce air quality impacts.
5. It is important to discuss how the mitigation measures will be monitored to ensure they are implemented.