



PLANNING COMMISSION MEMORANDUM SUPPLEMENTAL INFORMATION FOR HOLIDAY MARKET PROJECT

FILE NOs: PLN24-0089; GPA24-0003;
RZN24-0003; DVP24-2; MGT24-0011; EIS24-0007

HEARING DATE: December 2, 2025

APPLICANT/OWNER: North State Grocery, Inc. (Holiday Market) 

REPRESENTATIVE: Richie Morgan

SUPPLEMENTAL INFORMATION:

On November 17th, the legal firm of Remy, Moose, and Manley representing the Lake Wildwood Association submitted a comment letter regarding the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the project (Attachment 1). The letter claims the IS/MND is inadequate and that based on the "fair argument" standard an environmental impact report (EIR) is required. Other specific issues noted in the letter include potential impacts to aesthetics, air quality and greenhouse gas (GHG) emissions, transportation, and utilities and service systems. Due to the extensive comments contained in the letter, staff is providing this supplemental information to the Commission providing responses to issues raised in the letter subsequent to the distribution of the staff report.

Aesthetics

The proposed project will not have a significant impact on aesthetics. As noted under the ENVIRONMENTAL REVIEW section of the staff report, the proposed grocery store building will be setback over 250 feet from Pleasant Valley Road and will be at a higher elevation than Pleasant Valley Road. The parking lot and building will not be visible for a long period by persons traveling in vehicles along Pleasant Valley Road due to this setback, higher elevation, and the speed at which vehicles are traveling along the road. In addition, the site is located between parcels already developed with existing commercial and industrial uses. The applicant has provided colored elevations of the proposed building showing that attractive colors and design elements are being incorporated into the project. Existing trees located behind the proposed building, along the far eastern portion of the site, will be retained and will provide screening of the building from residences located to the east. Required landscaping along the front of the parcel along with the applicant retaining existing trees located at the southwest corner of the parcel will provide some visual buffering of the parking lot and building from Pleasant Valley Road.

The project will result in the applicant moving from their existing location within an existing commercial shopping center across from the Lake Wildwood subdivision entrance to the subject property into their new proposed building. Within retail commercial centers like this, tenants come and go over time leaving space available. Based on this center's location in close proximity to Lake Wildwood, the applicant's vacated space will likely not remain vacant for an extended period. The space will be

attractive for a new business to locate or for an existing business looking to relocate their business within the center looking for a larger space. The proposed project will therefore not lead to a building that is subject to blight. Additional information can be found in the Aesthetics section of the IS/MND attached to the staff report.

Air Quality/Greenhouse Gas Emissions

The proposed project will not have a significant impact on air quality and greenhouse gas (GHG) emissions. As noted under the ENVIRONMENTAL REVIEW section of the staff report, an Air Quality and Greenhouse Gas Impact Analysis was prepared for the project by Raney Planning and Management. The air quality and GHG impacts were evaluated in the Air Quality and Greenhouse Gas sections of the IS/MND contained in the staff report and five mitigation measures are recommended.

Raney Planning and Management has provided the attached responses to the air quality/GHG issues raised in the Remy Moose and Manley letter, included as Attachment 2.

Transportation

The proposed project will not have a significant impact on transportation. As contained in the ENVIRONMENTAL REVIEW section of the staff report, a Traffic Impact Analysis (TIA), or traffic study, was prepared by GHD consultants to analyze potential transportation related impacts. The project and the Traffic Impact Analysis were circulated to the County Public Works Department, Caltrans, and the Nevada County Transportation Commission (NCTC) for review.

As a result of concerns expressed by Lake Wildwood residents regarding the age of the traffic count data used in the traffic study (August 2022), the traffic consultant conducted new AM peak period (7:00-9:00 a.m.) and PM peak period (4:00-6:00 p.m.) intersection turning movement counts at all five project study intersections on Pleasant Valley Road. These peak period traffic counts were conducted on Tuesday October 21, 2025. Schools were in session on this day and it reflected a typical commute period for employees traveling to and from work.

The new 2025 intersection volumes are lower than 2022 traffic volumes at every project study intersection with one exception: Pleasant Valley Road/Highway 20. At this location, PM peak hour traffic volumes were 6.9% higher than the previous 2022 volumes. Intersection operations (Level-of-Service) were re-calculated for Existing (No Project) and Existing plus Project conditions. As a result of increased volumes, intersection operations at the Pleasant Valley Road/Highway 20 intersection would remain unchanged from previous 2022 levels with increases of 1.4 – 1.5 seconds of delay in overall intersection LOS. During the AM peak hour for Existing (No Project) Conditions, intersection LOS would remain unchanged (LOS C 21.9 seconds of delay to LOS C 23.3 seconds of delay). During the PM peak hour for Existing plus Project, intersection LOS would remain unchanged (LOS C 22.1 seconds of delay to LOS C 23.6 seconds of delay). Therefore, no revisions to the Mitigated Negative Declaration are necessary. Additional information can be found in the Transportation section of the IS/MND attached to the staff report.

A total of eight (8) mitigation measures are being required to address potential transportation impacts. In addition, to address potential traffic safety issues at the intersection of Pleasant Valley Road/Pine Shadows Lane, a condition has been added requiring the applicant to stripe the westbound Pine Shadows Lane approach to Pleasant Valley Road to include a separate left and right turn lane.

Both the County Public Works Department and the applicant's traffic consultant, GHD, have reviewed and provided responses to the transportation issues raised in the Remy Moose and Manley letter (see Attachments 3 and 4). In addition, GHD has reviewed other public comments received and provided a response matrix to these comments, included as Attachment 5.

Utilities and Service Systems

The project will not have a significant impact on utilities and service systems. The project parcel is located within the boundaries of the Nevada Irrigation District (NID). The District provided a comment letter dated October 21, 2024. The letter states the parcel has a standby account (#36351) and treated water service is available to the parcel from the Lake Wildwood Treatment Plant upon proper application to NID and payment of applicable connection fees. NID has capacity to serve the project.

Regarding wastewater treatment, the project parcel is currently located outside the boundaries of the Nevada County Sanitation District. The District boundary currently runs along the south side of the project parcel and there are several parcels to the south that are currently served by the District. The Nevada County Sanitation District has provided a "will serve" letter dated June 20, 2024, which states it has sufficient capacity in the Penn Valley Zone to accommodate an annexation request for the project parcel for the development of the proposed grocery store. For the District to provide future sewer service, it will be necessary for the parcel to annex into Nevada County Sanitation District No. 1, Penn Valley, Zone 6, and acquire sewer capacity. Subsequent to project approval, the property owner will be required to complete the annexation process through the Local Agency Formation Commission (LAFCo) prior to submitting a sewer connection application. The Nevada County Sanitation District has capacity to serve the project.

The site is served by Pacific Gas & Electric (PG&E) for electricity needs and solid waste services are provided by Waste Management. Both these utilities have capacity to serve the project. Additional information is provided in the Utilities and Service Systems section of the IS/MND.

Fair Argument

Under the California Environmental Quality Act (CEQA), a mitigated negative declaration is appropriate when mitigation measures integrated into the project will avoid or mitigate environmental effects to a point where no significant effect on the environment would occur. [*Upland Community First v. City of Upland*, 105 Cal. App. 5th 1, 325 Cal. Rptr. 3d 582 \(2024\)](#).

Although the *fair argument* standard creates a low threshold for EIR preparation, this standard must be applied in the proper context. Mitigated negative declarations reflect the policy that a lead agency's determination of environmental impacts should be based on the form of the project as considered for approval, not as the project might otherwise have been constructed or conducted. *Id.* When an agency circulates a draft initial study and a proposed MND to the public for comment, the public has an opportunity to review the proposal to determine whether the changes are sufficient to eliminate the significance of the effects. *Id.*

The County's environmental review process has properly identified potential environmental concerns and incorporated mitigation measures that reduce any impacts to less than significant levels. If there is no substantial evidence, in light of the whole record that the project may have a significant effect on the

environment, the agency may prepare a negative declaration for the project, and if substantial evidence shows the project may have a significant environmental impact, but the impact can be mitigated to insignificance through project revisions that the applicant agrees to before the agency approves the project, the agency may prepare a mitigated negative declaration for the project. *Id.*

Additional public comments received

Included as Attachment 6 are additional public comments received since the distribution of the staff report.

ATTACHMENTS:

1. Remy Moose Manley comment letter, dated November 17, 2025
 2. Raney air quality/GHG consultant response to comment letter, dated November 21, 2025
 3. Nevada County Public Works Dept. response to comment letter, dated November 21, 2025
 4. GHD traffic consultant response to comment letter, dated November 25, 2025
 5. GHD responses to public comments matrix
 6. Additional public comments received after distribution of staff report
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LLP

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November 17, 2025

By Email

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Re: North State Grocery, Inc. – Holiday Market (Penn Valley) Project Draft Initial Study / Negative Declaration

On behalf of the Lake Wildwood Association, we submit the following comments on the Initial Study / Mitigated Negative Declaration (MND) for the “North State Grocery, Inc. – Holiday Market (Penn Valley) Project” (the Project). As explained below, the MND is inadequate in numerous areas. Because there is substantial evidence supporting a fair argument that the Project may result in significant environmental impacts, the County must prepare a full Environmental Impact Report (EIR).

We are also providing comments on the Penn Valley Holiday Market Traffic Impact Analysis Memorandum (Traffic Memo), dated November 6, 2024. The Traffic Memo is fatally defective for numerous reasons and does not meet the requirements of the County’s Traffic Impact Analysis Guidelines (TIAG). Even with its shortcomings, the Traffic Memo and the MND acknowledge the Project will increase traffic congestion and cause other transportation-related impacts, which will adversely impact both residents and visitors alike. But the County has not identified sufficient mitigation to address these impacts, which as explained below, will likely be even worse than disclosed in the reports.

The Lake Wildwood Association does not oppose a new Holiday Market in Penn Valley, but the County must ensure that the public and the decisionmakers are fully informed, and that all the Project’s impacts are adequately analyzed, disclosed, and mitigated to the fullest extent feasible. The County has not fulfilled this obligation.

1. The “fair argument” standard purposely sets a low threshold for requiring an EIR.

A lead agency may rely on a negative declaration only where “[t]here is *no* substantial evidence, in light of the whole record before the lead agency, that the project *may* have a significant effect on the environment.” (Pub. Resources Code, § 21080, subd. (c)(1), italics added; see also *id.* § 21082.2, subd. (a).) Where a negative declaration is not possible, a mitigated negative declaration (MND) is sometimes an option, but only where mitigation measures integrated into the project will “avoid the effects or mitigate the effects to a point where *clearly* no significant effect on the environment would occur” and still “there is no substantial evidence, in light of the whole record before the lead agency, that the project, as revised, may have a significant effect on the environment.” (Pub. Resources Code, § 21080, subd. (c)(2), italics added.)

The flip side of these legal standards is that an EIR is *required* “[i]f there is [any] substantial evidence, in light of the whole record before the lead agency, that the project *may* have a significant effect on the environment.” (*Id.*, subd. (d), italics added; see also *id.* § 21082.2, subd. (d).) Stated another way, an EIR is required whenever any substantial evidence in the record supports a “*fair argument*” that significant impacts *may* occur. Even if other substantial evidence supports the opposite conclusion, the agency nevertheless must prepare an EIR. (CEQA Guidelines, § 15064, subd. (f)(1); see, e.g., *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75 (*No Oil I*); *Friends of “B” Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1000–1003; see also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 319; *Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 171-172.)

“In the CEQA context, substantial evidence ‘means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.’” (*Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 730, quoting CEQA Guidelines, § 15384, subd. (a).) As the courts have recognized, even non-expert lay testimony or evidence can be enough to trigger an EIR. (See, e.g., *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928 (*Pocket Protectors*); *Citizens Assn. for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151, 173; *Keep Our Mountains Quiet, supra*, 236 Cal.App.4th 714.)

The “fair argument” standard purposely creates a “low threshold” for requiring preparation of an EIR “in order to maximize environmental protections and thereby fulfill the purposes inherent in CEQA.”. (*Georgetown Preservation Society v. County of El Dorado* (2018)

30 Cal.App.5th 358, 370; see also *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 310 (*Sundstrom*); *Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1331; *Save the Agoura Cornell Knoll v. City of Agoura Hills* (2020) 46 Cal.App.5th 665, 676.) The fair argument standard is founded upon the principle that, because adopting a negative declaration has a “terminal effect on the environmental review process” (*Citizens of Lake Murray Area Assn. v. City Council* (1982) 129 Cal.App.3d 436, 440), an EIR is necessary to “substitute some degree of factual certainty for tentative opinion and speculation” and to resolve “uncertainty created by conflicting assertions” (*No Oil I, supra*, 13 Cal. 3d at p. 85).

As one court put it, “[t]hese legal standards reflect a preference for requiring an EIR to be prepared.” (*Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332.) EIRs must be prepared in “doubtful case[s],” so that agencies do not make decisions “without the relevant data or a detailed study of it.” (*No Oil I, supra*, 13 Cal. 3d at p. 84.) “It is the function of an EIR, not a negative declaration, to resolve conflicting claims, based on substantial evidence, as to the environmental effects of a project.” (*Pocket Protectors, supra*, 124 Cal.App.4th at p. 935.)

As the California Supreme Court explained long ago, a project need not have an “momentous effect of semi-permanent duration” to require an EIR. (*No Oil I, supra*, 13 Cal.3d at p. 87.) Rather, an agency must prepare an EIR “whenever it perceives some substantial evidence that [a] project may have a significant effect environmentally.” (*Id.* at p. 85.) An EIR is required even if substantial evidence in the record supports a conclusion that significant impacts will not occur, if a “fair argument” supports the opposite conclusion. (*Id.* at p. 75.)

When there is conflicting evidence on the extent of the environmental effects of a project, the lead agency must conclude that the effects may be significant and prepare an EIR. (*Pocket Protectors, supra*, 124 Cal.App.4th at p. 935; *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1317-18; CEQA Guidelines, § 15064, subd. (g).) In the context of reviewing an MND, “neither the lead agency nor a court may ‘weigh’ conflicting substantial evidence to determine whether an EIR must be prepared in the first instance.” (*Pocket Protectors, supra*, 124 Cal.App.4th at p. 935.) Where such substantial evidence is presented, “evidence to the contrary is not sufficient to support a decision to dispense with preparation of an EIR and adopt a negative declaration, because it could be ‘fairly argued’ that the project might have a significant environmental impact.” (*Sundstrom, supra*, 202 Cal.App.3d at p. 310.)

“While a fair argument of environmental impact must be based on substantial evidence, mechanical application of this rule would defeat the purpose of CEQA where the local agency

has failed to undertake an adequate initial study. The agency should not be allowed to hide behind its own failure to gather relevant data.” (*Id.* at p. 311.) “CEQA places the burden of environmental investigation on government rather than the public. If the local agency has failed to study an area of possible environmental impact, a fair argument may be based on the limited facts in the record. Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences.” (*Ibid.*)

As explained below, there is at least a fair argument that the Holiday Market Project may have a significant environmental impact in numerous resource areas. Therefore, the County must require an EIR for the Project.

2. Aesthetics

As noted above, lay testimony regarding non-technical subjects like aesthetics is sufficient to require an EIR.

While the MND acknowledges the Project will result in a change in the appearance of the site, it concludes that aesthetic impacts will be less than significant or non-existent, apparently because the Project will incorporate contemporary design standards and landscaping in accordance with County requirements. But this conclusion is not supported and there is ample substantial evidence supporting a fair argument that the Project may result in significant aesthetics impacts.

First, the lack of any photographs or visual simulations of existing or future conditions makes it virtually impossible for the public or the decision makers to understand the magnitude of the Project’s aesthetic impacts. In any event, it is readily apparent that the Project may have significant impact. The large site—which spans approximately 5.5-acres—is predominantly located along one of the County’s main thoroughfares and is therefore a significant public viewpoint for residents and visitors. The site is currently occupied well over a hundred mature trees and other vegetation, including Landmark Groves and Landmark Oak trees, with a small residence and a few small accessory buildings that are mostly shielded from public view. This will all be removed and replaced with a 30,711 square-foot building and a surface parking lot. Replacing a mostly natural wooded landscape with a giant block-shaped building and an asphalt parking lot will drastically degrade the visual character of the site and the quality of public views of the site and its surroundings. The fact that the Project will meet the County’s design and landscaping requirements does not change this fact. (See *Georgetown Preservation Society v. County of El Dorado* (2018) 30 Cal.App.5th 358.)

The County's prior analysis for a proposed Dollar General Store provides a useful comparison. There, the County prepared an EIR for three proposed Dollar General Stores, each comprising barely one acre, and each having only 9,100 square feet of building area (compared to 5.5 acres and 30,711 square feet of building area for the proposed Holiday Market Project).¹ Like the proposed site at issue here, the proposed Alta Sierra site was located on a main throughfare, resulting in high visibility. The surrounding area was characterized by commercial developments (including storage units), single-family homes, and areas of vacant undeveloped land. The EIR noted that the site was surrounded by asphalt or pavement on all four sides, with existing commercial development to the north and south and roads to the east and west. Although that project included landscaping and design consistent with County requirements, and mitigation to improve aesthetics, the EIR concluded that "[e]ven with these measures [] development of the Alta Sierra site as proposed would substantially change the existing visual character of the site," and therefore, the impact was significant and unavoidable. The conditions here are very similar, except the aesthetic and visual quality impacts would be substantially worse given the much larger size of the proposed Project.

The County's Dollar General EIR also concluded that aesthetic impacts would be significant and unavoidable for the proposed Rough and Ready location under similar circumstances. The change in views and visual quality would be even more drastic here.

The MND does not provide enough information to be able to assess whether signage would result in potential aesthetics impacts, including light and glare. The MND indicates that size and design details of the proposed project signage are currently being worked on and a comprehensive sign program that is consistent with Nevada County Code requirements will be required to be submitted to the Planning Department for review and approval. The County cannot defer this analysis. More importantly, without this information, there is a fair argument that the Project may have a significant impact.

3. Air Quality and Greenhouse Gas (GHG) Emissions

The air quality modeling includes a number of assumptions that are not explained or supported and there are numerous analytical gaps and inconsistencies. For example, the MND states that 2,306 sq. ft. of building materials and 21,945 cubic yards of soil would be exported from the site during construction. But the MND does not identify where these materials would go or how many truck trips would be required. Standard dump trucks carry 10-16 cubic yards,

¹ See excerpts from the Dollar General EIR included as Attachment 1.

which means there would be at least 1,372 truck trips just to remove soil from the site. How far would those trips be? Would it go to a landfill or other type of facility? This information is necessary to analyze and understand the Project's air quality and GHG impacts. This information is also necessary to analyze other impacts related to the disposal of waste, including whether there is capacity in the local system. The Utilities and Services Systems section of the MND does not mention construction waste.

The discussion of construction and operational emissions include almost no analysis or explanation whatsoever, making it virtually impossible for the public or decisionmakers to understand the Project's impacts. Presenting raw numbers and bare conclusions without sufficient explanation does not foster public participation or informed decision-making and does not meet the requirements of CEQA.

Although the MND notes that there is a State Implementation Plan (SIP) for western Nevada County, it does not explain whether the Project is consistent with the SIP. According to the NSAQMD Guidelines, an SIP takes precedence over the thresholds of significance identified in the Guidelines.

The MND states that the air quality modeling included adjustments consistent with project-specific trip rate data provided by GHS for the proposed project but does not identify what those adjustments were (there is a footnote "1" indicated on page 31, but there is no footnote). Assuming the data is based on the Traffic Memo, the data is fundamentally flawed and severely undercounts trips and other relevant data points as explained below in the Transportation section. It is also unclear whether the air quality analysis includes the increased emissions caused by the degraded level of service that will occur at several intersections and roadways. This analysis must be redone with realistic trip counts and traffic assumptions to be able to assess the Project's air quality impacts.

The analysis also assumes that there would be no cumulative significant impacts because the Project-specific impacts would be less than significant. That is not how CEQA works. In fact, CEQA requires cumulative impacts analyses specifically for this purpose, so it can be determined whether a project in combination with other projects would result in a significant impact even though the impacts of the individual project may be less than significant.

Finally, the analysis of GHG impacts is severely flawed. Although the MND expressly acknowledges that "the primary source of GHG emissions for the project would be mobile

source emissions,” the analysis does not quantify those emissions and excludes them entirely from the impact assessment. As explained below in the Transportation section, the assumption that the Project will result in a reduction in VMT is unsupported and erroneous. The analysis must also consider delivery trucks and other mobile source emissions in addition to passenger vehicles. According to the MND, the project would require seven medium and seven heavy trucks on Fridays alone, not including deliveries on other days of the week. Adding what the MND itself describes as the Project’s “primary source” of GHG emissions to the other sources of emissions identified in the MND will very likely cause the Project to exceed the threshold of significance. The County should also explain why the identified threshold of significance is appropriate for this Project.

4. Transportation

Both the transportation analysis in the MND and the Traffic Memo upon which it is based suffer numerous defects and the conclusions are either not adequately supported or are contrary to fact, or both.

First, the data used for the traffic analysis is outdated and does not meet the requirements of the County’s TIAG or CEQA. The Traffic Memo identifies Year 2022 as “existing conditions,” and uses 2022 conditions as the point of comparison to identify Project impacts. In CEQA terms, this is called the “baseline.” Under CEQA, when an agency prepares an MND, the baseline must reflect conditions that exist at the time the MND is prepared. Since the County is required to prepare an EIR, for all the reasons explained in this letter, the baseline must reflect conditions that exist when the County issues the Notice of Preparation (NOP), which has not yet occurred. Thus, using 2022 as the baseline would not meet CEQA’s requirements in any scenario. The other points of comparison (i.e., Year 2024 as future “near term” conditions and Cumulative Year 2042 conditions) are similarly off base and unhelpful for analyzing the Project’s impacts under CEQA or the TIAG.

In addition, according to the TIAG, traffic counts cannot be more than two years old. Here, the traffic counts are much older than two years. Even if the County claims the TIAG only requires traffic data to be collected within two years of the traffic study completion and not the CEQA analysis, which is illogical, the TIAG also requires updated analysis if the existing analysis is more than two years old and conditions have changed and/or the proposed project has changed. Here, traffic in the study area has increased substantially since 2022 as the County continues to recover from the Covid pandemic when traffic levels were depressed. Moreover,

traffic is normally heavier on Fridays and Weekends when the owners of second homes and relatives of full-time residents come to visit. By the Holiday Market's own admission, car traffic is heavier on weekends. There has also been a significant difference in the type of school traffic travelling on Pleasant Valley Road compared to 2022. Further, it does not appear that the Traffic Memo contemplated a Starbucks, which alone will fundamentally change the analysis, including more trips and more VMT as just two examples, and will affect both the traffic and air quality/GHG analysis.

It also appears that the Traffic Memo used outdated methodology and modeling tools. For example, the Traffic Memo cites the Highway Capacity Manual (HCM) 6th Edition (2016), but it should have followed the methodology in the most recent version of the HCM (a 7th Edition), which was released in 2022. The Traffic Memo also calculates daily and peak hour project trip generation using the Institute of Transportation Engineers (ITE) Publication Trip Generation Manual (11th Edition), while a new edition (12th Edition) was published in August 2025. The analysis must be redone using up-to-date methodology.

The Traffic Memo and MND also rely on insufficient data. For example, the Traffic Memo relies on data (e.g., traffic counts) collected on a single Tuesday in August 2022 during the AM peak and PM peak periods. According to the County's TIAG: "In general, the peak hour trip generation shall be that of a typical weekday and shall coincide with the peak hour of the roadway system (not the peak hour of the generator); however, there may be instances where a unique project use requires an analysis during different time frames." The TIAG further specifies that Peak Hour traffic counts shall be conducted between 7:00am to 9:00 am and 4:00 pm to 6:00 pm on a Tuesday, Wednesday or Thursday during the normal public-school period (i.e. September to May). Although Tuesday is one of the days identified in the TIAG, the chosen date was not within the permissible September-to-May window. Even more important, however, is that the TIAG acknowledges that a single-day traffic count, even on the specified days, is not always appropriate particularly if traffic that day does not reflect typical conditions. As already noted, the traffic counts do not reflect typical conditions and, as a result, the analysis underestimates traffic impacts. For this type of project in this area, the analysis must also consider weekend traffic. And the County should also require a worst-case analysis so that the decision-makers and the public can understand the real severity of the traffic impacts that will result from the Project.

Although the discussion of traffic modeling is far from transparent, there are some obvious flaws regarding the modeling inputs and trip generation assumptions. For example, the

modeling does not accurately reflect the fact that many trips to the current location are via golf cart or other non-auto modes that will turn into vehicle trips for the new location. The Traffic Memo appears to subtract trips from the existing store from the trip generation calculations for the new location, but that appears to be based on square footage (e.g., subtracting the trips generated by 12,870 square feet of supermarket use [current location] from the trips generated by 30,268 square feet of supermarket use [new location]). The methodology fails to reflect the unique facts that exist for this Project and must be redone to account for the project-specific circumstances.

According to the County's TIAG, traffic studies must include a discussion of any unusual circumstances anticipated during construction. Proposed transportation facility closures, construction signage, haul routes, impacts to public facilities, safety features, and detours must also be included in the analysis. Here, the Traffic Memo and the MND fail to adequately address construction-related impacts.

The Traffic Memo's discussion of site access and on-site circulation does not address all of the specific items identified in the County's TIAG. Specifically, the TIAG requires that the discussion of on-site circulation include "descriptions of the proposed access points, turn prohibitions, number of lanes proposed, on-site transit stop locations, driveway throat depth, parking supply/demand/parking aisle circulation, on-site pedestrian circulation, bicycle parking, on/off-site delivery truck circulation and any other applicable circulation issues." While the Traffic Memo discusses some of these topics, it is very general. Notably, the Traffic Memo does not specifically discuss delivery truck circulation.

Under the County's TIAG, traffic studies must also include a discussion of potential safety impacts. The TIAG specifies that the discussion should include fire safety and emergency access, and compliance with the Americans with Disabilities Act (ADA), and "may also include an analysis of residential neighborhoods impacts, discussion on potential noise and air quality impacts, etc." Here, the discussion of safety impacts in the Traffic Study is cursory and not well supported. For example, Section 13 (Summary, Mitigation, and Recommendations) states the identified mitigation will improve safety, but the discussion is conclusory.

As another example, Section 13.4 (On-Site Circulation) identifies only one potential safety impact that would be caused by the northerly extension of Commercial Drive to Pine Shadows Lane, which would divide the Holiday Market's main parking field from the supermarket building. Although Section 13.1 identifies mitigation for this impact, the Traffic

Memo does not explain why the mitigation would be effective or why other safety impacts would not occur.

The discussion of emergency access is a single sentence: "Emergency access is adequately provided through the project access driveways from Pine Shadows Lane and the northerly extension of Commercial Avenue." The Traffic Memo does not explain why the access is "adequate" or how emergency access issues would be handled on-site.

The Traffic Memo also does not discuss the project's impact on fire safety, evacuation routes/plans, compliance with the ADA, residential neighborhood impacts, or potential noise and air quality impacts that could result from increased traffic, including construction equipment and delivery trucks.

According to the County's TIAG, "if the project traffic causes an intersection or roadway segment to worsen from an acceptable LOS to an unacceptable LOS or is distributed to an intersection or roadway segment currently operating at an unacceptable LOS, the project impacts must be mitigated to an acceptable LOS to remain consistent with Nevada County General Plan Circulation Element Policies LU-4.1.1 and 4.1.2." Since the Project will cause or at least contribute to worsening LOS to an unacceptable level at certain intersections and roadways segments under certain scenarios, and will not be mitigated to an acceptable LOS, the Project is not consistent with the County's Circulation Element.

As noted in the MND and the Traffic Memo, CEQA is focused primarily, although not exclusively, on VMT-related impacts. The MND and the Traffic Memo, however, improperly omit any discussion of the Project's VMT impacts. The Traffic Memo concludes that, based on technical guidance from the Office of Planning and Research (OPR), now the Governor's Office of Land Use and Climate Innovation (LCI), "the project would likely be screened out," meaning further VMT analysis would not be required. The cited guidance indicates that "local serving" retail development, as opposed to "regional serving" retail development, tends to shorten trips and reduce VMT by adding opportunities into the urban fabric and improving retail destination proximity, and therefore, lead agencies generally may presume such development creates a less-than-significant transportation impact. The County's analysis stops there. But the guidance also states that lead agencies should also consider "any project-specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior." And the County's own TIAG acknowledges that projects that meet the screening criteria still might not be screened out if there are unique project factors that may create VMT.

Here, the County improperly relies on screening criteria to ignore the Project's VMT impacts. For example, the County is not adding a new retail opportunity for local residents but instead is moving an existing retail opportunity to a different location, resulting in new trips and further travel distances for customers. Notably, the courts have recently been critical of agencies for relying on OPR's guidance without accounting for project- or location-specific information. (See *Cleveland National Forest Foundation v. County of San Diego* (2025) 110 Cal.App.5th 948 [rejecting use of OPR's recommended VMT thresholds without considering local conditions].) The analysis also ignores VMT related to the proposed Starbucks, which will generate additional trips and VMT unique from shoppers at the grocery store. The Project's VMT impacts must be properly quantified and adequately analyzed in an EIR.

The MND also fails to address how the increased traffic will affect emergency response times and evacuation routes.

Finally, it is unclear whether the impacts resulting from the mitigation measures have been included in the analysis. This comment applies for all resource categories in the MND.

5. Utilities and Service Systems

The MND improperly defers the analysis of impacts caused by sewer connections and related infrastructure. The County cannot defer this analysis. Since these are required elements of the Project, they cannot be segmented and analyzed separately (See *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209 ["CEQA forbids 'piecemeal' review of the significant environmental impacts of a project."].)

6. Additional impacts that are not analyzed

The MND also fails to consider other potential impacts that could result from the Project. Most notably, the MND fails to analyze the impacts caused by vacating the existing Holiday Market site. For example, it is reasonably foreseeable that the property could sit vacant and cause blight.

* * *

Thank you for the opportunity to review and comment on the Draft MND. For all the reasons explained above, the County must require an EIR for the Project and require an updated

Steve Geiger, Senior Planner
Nevada County Planning Department
November 17, 2025
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traffic analysis. This is the only way the public and the decision-makers can be fully informed, consistent with both the letter and spirit of CEQA. To reiterate, the Lake Wildwood Association does not oppose a new Holiday Market in Penn Valley. The problem is that the Project's impacts have not been adequately analyzed, disclosed, and mitigated. This includes the Project's transportation and traffic impacts, which have been given short shrift, and for which the County has not identified an adequate solution.

Very truly yours,



Chris Stiles

cc: Christopher Boyd (Chrisb@lwwa.org)

Attachments:

Attachment 1 – Excerpts from Nevada County Dollar General EIR

Attachment 1

4.0 AESTHETICS

This section addresses the existing visual resources at each of the project sites and vicinity, and discusses the potential impacts of the proposed project on aesthetics and light/glare.

4.0 GENERAL ENVIRONMENTAL CONDITIONS AND REGULATIONS

4.0.1 ENVIRONMENTAL SETTING

Regional Scenic Resources

Visual resources that characterize Nevada County include the rolling vistas of foothills, valleys, mountains, meadows, forests, wetlands, and habitats unique to the Sierras. Scenic views within the county include mountain peaks such as Castle Peak, vistas of Donner Lake, and the gorge of the South Fork of the Yuba River. The county is predominantly rural in character, with development concentrated in Nevada City, Grass Valley, and Truckee. The scenic values and aggregate appearance of all the cities, towns, and suburban areas define the aesthetic quality of Nevada County. Outside of these communities, residences are scattered throughout the county. In addition, land use patterns and areas preserved as open space contribute significantly to the county's aesthetic quality. The ownership and operation of forests by the US Forest Service in the Tahoe National Forest and the open lands under the control of the Bureau of Land Management also preserve a significant portion of the county for permanent scenic quality (Nevada County 1996a, p. 18-1).

Scenic Highways

According to the General Plan, scenic routes in the county include Interstate 80 (I-80) and State Routes (SR) 49, 89, 174, and 267 for the entire length of the county; SR 20 from SR 49 to I-80; and Donner Pass Road from the I-80 intersection at Soda Springs to Donner State Memorial Park (Nevada County 1996b, p. 163).

According to the California Department of Transportation (Caltrans) Scenic Highway Mapping System, while I-80, SR 20, SR 49, SR 89, and SR 174 are eligible state scenic highways, the only officially designated state scenic highway in Nevada County is SR 20 from Skillman Flat Campground to a half mile east of Lowell Hill Road (Caltrans 2015).

In addition, the County has adopted a scenic corridor ordinance that applies a Scenic Corridor (SC) combining district to applicable properties along the SR 49 and SR 20 corridors. None of the project sites are identified as being within the SC combining district.

Light and Glare

There are two typical types of light intrusion. First, light emanates from the interior of structures and passes through windows. Second, light projects from exterior sources, such as street lighting, security lighting, and landscape lighting. "Light spill" is typically defined as the presence of unwanted and/or misdirected light on properties adjacent to the property being illuminated. Light introduction can be a nuisance to adjacent residential areas and diminish the view of the clear night sky. In addition, if the light is uncontrolled, it can disturb wildlife in natural habitat areas.

Perceived glare is the unwanted and potentially objectionable sensation as observed by a person when looking directly into the light source of a luminaire. Glare also results from sunlight reflection off flat building surfaces, with glass typically contributing the highest degree of reflectivity.

4.0 AESTHETICS

4.0.2 REGULATORY FRAMEWORK

State

California Scenic Highway Program

The California Scenic Highway Program intends to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to scenic highways. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been so designated. Cities and counties can nominate eligible scenic highways for official designation by identifying and defining the scenic corridor of the highway. The municipality must also adopt ordinances to preserve the scenic quality of the corridor or document such regulations that already exist in various portions of local codes.

SR 49, which is located 0.1 mile west of the Alta Sierra project site, and SR 20, located 0.3 mile north of the Penn Valley site, are eligible for designation as state scenic highways (Caltrans 2015).

Local

Nevada County General Plan

The Nevada County General Plan includes policies intended to protect the visual character of the county and promote visually attractive development through appropriate site and architectural design. The Aesthetics Element includes policies that are designed to protect scenic resources and reduce light and glare impacts. General Plan Aesthetics Element project-related policies include the following:

- Policy 18.6 Discretionary development in Rural Regions and in Community Regions near the Community Boundary shall, wherever possible, preserve natural landmarks and avoid ridge-line placement of structures.
- Policy 18.7 Encourage protection of scenic corridors wherever feasible.
- Policy 18.11 New Commercial, Industrial and Multiple Family development shall utilize fixtures and light sources that minimize nighttime light pollution.

Nevada County Land Use and Development Code

Section L-II 2.7.7 – Scenic Corridor Combining District (SC)

The Nevada County Land Use and Development Code, Chapter II, Article 2.0, Section L-II 2.7.7, includes regulations applicable in the Scenic Corridor combining district. The purpose is to protect and preserve the scenic resources of areas adjacent to highways and roads that have been identified as having high scenic quality and requiring protection for the benefit of residents and visitors.

Chapter II, Article 4.0 – Comprehensive Site Development Standards

Chapter II, Article 4.0 provides regulations to guide the design, location, and development of new land uses and the alteration of existing uses in the unincorporated county. The standards assist in furthering numerous Nevada County General Plan goals, objectives, and policies that provide for the preservation and enhancement of Nevada County's rural quality and small-town character.

They also assist in promoting General Plan provisions for maintaining the county's high quality natural landscape and scenic resources, as well as protecting existing historic resources.

Division L-II 4.2 – Community Design Standards

The County's community design standards are intended as a framework to assist in understanding the County's goals and objectives for high quality development. They provide design interpretations for commercial, industrial, and residential development. The community design standards address building height, building setbacks, height limits for fencing and hedges located within yard setbacks, landscaping requirements, parking lot design standards, requirements for permanent open space and maximum impervious surfaces, equipment screening, and signage standards.

Section L-II 4.2.8 – Lighting

Chapter II, Article 4.0, Section L-II 4.2.8 establishes standards to provide for efficient, safe, and attractive outdoor lighting while minimizing nighttime light pollution and energy waste. This section of the code requires all discretionary projects that propose to install outdoor lighting to submit a lighting plan. The code section also requires all outdoor light fixtures to be fully shielded to prevent the light source or lens from being visible from adjacent properties and roadways and requires the use of fixtures with high efficiency lamps. Light poles in the rural zoning districts, including the proposed project sites, are restricted to a maximum height of 15 feet.

Section L-II 4.2.10 – Permanent Open Space/Maximum Impervious Surface

Chapter II, Article 4.0, Section L-II 4.2.10 was established to conserve and maintain the natural and historic beauty of Nevada County, to promote soil conservation, surface water quality and groundwater recharge, to enhance residential and commercial areas, and to ensure permanent open space and maximum impervious surfaces for all development. Permanent open space is required in all commercial, industrial, multiple-family, public, and recreational zoning districts. For projects that are one acre or more in size and located at less than 4,000 feet elevation, the requirement is a minimum of 15 percent of the total site acreage.

Section L-II 4.3.17 – Watercourses, Wetlands and Riparian Areas

Chapter II, Article 4.0, Section L-II 4.3.17 was established to preserve the integrity and minimize the disruption of watersheds and watercourses. The section establishes minimum non-disturbance buffers along various types of waterbodies in which development may not occur unless a Management Plan is prepared by a qualified biologist or botanist that avoids or minimizes impacts to the resource.

Section L-II 5.3 – Design Review

Chapter II, Article 5.0, Section 5.3 outlines a procedure by which new development is reviewed for compatibility with surrounding development, natural resources, and/or historic features within the project area. Design review ensures that a proposed development project reflects and retains the rural and historic, small-town character of the county; ensures each community's unique character, identity, and distinctiveness; encourages visual relief through varied forms, patterns, and styles unified through landscaping, screening, and selected architectural features; and retains natural landforms and native landscaping, protects sensitive environmental resources, and encourages open space. Design review is required for all development permits and use permits for commercial, industrial, and multi-family projects, for structural changes to the exterior of

4.0 AESTHETICS

commercial or industrial buildings, and for exterior visual changes to a project approved by a previous land use permit, unless specifically exempted in a specific section or article of Chapter II of the Land Use and Development Code.

Western Nevada County Design Guidelines

The Western Nevada County Design Guidelines include a menu of design concepts and techniques to assist project developers in enhancing the character of Nevada County by encouraging the highest level of design quality while at the same time providing the flexibility necessary to promote economic viability. The guidelines promote new development that encourages a sense of place and that adds to community identity by inviting pedestrian activity, i.e., placing buildings closer to roads, limiting building size to a human scale, clustering buildings, placing parking behind buildings, breaking up parking lots with trees and walkways, and creating clearly visible entries and public places (Nevada County 2002).

4.0.3 IMPACT METHODOLOGY

Standards of Significance

The impact analyses below are based on the following State CEQA Guidelines Appendix G thresholds of significance, which state that a project would have a significant aesthetic impact if it would:

- 1) Have a substantial adverse effect on a scenic vista.
- 2) Substantially damage or fail to protect and preserve scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- 3) Substantially degrade the existing visual character or quality of the site and its surroundings, including failing to promote and provide for aesthetic design in new development which reflects existing character.
- 4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Methodology

The following analyses are based on field observations, aerial photography, and review of the topographic conditions from GIS maps and Google Earth for the project sites and surrounding areas. For the purposes of this analysis, proposed site plans, building elevations, and photosimulations were used to determine how the projects would alter the existing conditions on the sites. The County's General Plan, site development standards, and applicable design guidelines were reviewed to determine what visual elements have been deemed valuable by the community. The analysis focuses on the manner in which development could alter the visual elements or features that exist in or near the project site, within the visual range or view corridor of each project.

The analysis further considers whether the anticipated alterations to the visual character of the sites would constitute a substantial adverse effect on existing views and scenic resources, which would result in a significant environmental impact. The determination of which changes to the visual environment cross a threshold of "substantial adverse effect" or degradation is based on

the criteria described in the following methodology summary. Following professionally accepted practice in visual analysis, visual impacts are defined as a consequence of three primary factors:

- The existing scenic quality of an area;
- The level of viewer exposure and concern with visual change; and
- The level of actual visual change caused by the project.

The overall visual sensitivity of each location is first established based on existing visual quality, viewer exposure, and viewer concern. These factors are then considered together with the level of expected visual change or contrast, and significance. Visual change is an overall measure of contrast in basic visual attributes such as form, line, color, and texture as a result of the proposed project. Thus, a substantial adverse effect can occur when viewers with high levels of overall visual sensitivity (i.e., high viewer concern and visual exposure, in settings of high existing visual quality) encounter high levels of visual change (contrast) or scenic view obstruction as a result of the proposed project.

Thresholds Not Evaluated

There are no state-designated scenic highways in any of the project areas and none of the sites can be seen from a county-designated scenic highway. The sites are not located in the SC combining district. Therefore, the proposed projects would have no effect on scenic resources within a state scenic highway. There would be no impact relative to Standard of Significance 2, and this impact is not further evaluated for any of the project sites.

4.1 ALTA SIERRA SITE

4.1.1 PROJECT-SPECIFIC SETTING

Visual Character of the Site

The Alta Sierra project site is located in the western Sierra Nevada foothills between Alta Sierra Drive and Little Valley Road and consists of three parcels. The 1-acre parcel on which the store would be constructed is vacant, is covered entirely with hardwood and conifer trees, and is situated on a hillside that generally slopes to the south. The septic system tight line and leach field would be constructed on two parcels immediately north of the store site which are developed with commercial uses. Elevations on the store parcel range from approximately 1,994 feet in the north to 1,964 feet near the southeastern and southwestern property corners. The site can be seen from Alta Sierra Drive and Little Valley Road, as well as from surrounding properties.

A Management Plan for Oak Resources was prepared for the project site (Costella 2015). According to this plan, the canopy cover within the proposed store site includes approximately 74 oak trees, of which 71 are black oaks and 3 are small valley oaks (Costella 2015, p. 4). The County does not identify the site as being within a scenic corridor or a scenic viewshed, nor is the site located along a state scenic highway.

Photographs of the Alta Sierra project site from a series of key viewpoints in the vicinity, as well as a map showing the location of these viewpoints, are provided in **Figures 4.0-1** through **4.0-5**.

4.0 AESTHETICS

Visual Character of Surrounding Uses

The area surrounding the Alta Sierra site is characterized by commercial developments, a scattering of single-family homes, and areas of vacant undeveloped land. The store site is surrounded by asphalt or pavement on all four sides, with existing commercial development to the north and south of the site and Alta Sierra Drive and Little Valley Road to the west and east, respectively. West of Alta Sierra Drive are two undeveloped parcels. Other uses to the west include single-story commercial development, with a personal storage facility, a real estate office, and the Oak View Center. Directly east of Little Valley Road is a developed residential parcel. The next closest residential dwelling is approximately 100 feet from the northeastern property boundary and approximately 400 feet from the proposed building. Rural residential uses dominate the landscape east of Little Valley Road, including the Alta Sierra residential subdivision. To the south of the project site is the Alta Sierra Market. To the north of the project site is another developed property with three commercial buildings. Farther north/northwest along Alta Sierra Drive are other commercially developed properties consisting of a variety of uses, including but not limited to a gas station, a bike shop, a pizza parlor, and a specialty wine shop.

Light and Glare

Given the rural character of the Alta Sierra site and the surrounding area, it is expected that only minimal nighttime lighting is visible on or near the site associated with existing residences and vehicles traveling on area roadways. Similarly, there is minimal daytime glare visible in the area associated with glass and other reflective building materials and vehicle windows.

4.1.2 REGULATORY FRAMEWORK

There are no additional regulations, policies, or standards that pertain to the Alta Sierra site other than those described in Subsection 4.0.2, above.

4.1.3 IMPACTS AND MITIGATION MEASURES

Adversely Affect a Scenic Vista and/or Substantially Degrade the Visual Character of the Site (Standards of Significance 1 and 3)

Impact 4.1.1(AS) Development of the Alta Sierra project site as proposed would convert vacant land to commercial development. Such a conversion would fundamentally alter the visual character of the site. **(Significant and Unavoidable)**

A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. While the General Plan does not establish specific scenic vistas in the county, it does identify visual resources that characterize Nevada County. These include the rolling vistas of foothills, valleys, mountains, meadows, forests, wetlands, and habitats unique to the Sierras. Additionally, scenic views within the county are identified as mountain peaks such as Castle Peak, vistas of Donner Lake, and the gorge of the South Fork of the Yuba River (Nevada County 1996a, p. 18-1).

Implementation of the proposed project would convert the approximately 1-acre store site from a wooded, undeveloped state to a commercial development. New uses would include a 9,100-square-foot, 27-foot-high commercial building; 20,260 square feet of surfaced area with 34

parking spaces;¹ two concrete block screening/retaining walls along the eastern and southern sides of proposed building and parking lot that would vary in height with the natural topography from 6 to 12 feet high; and 7,481 square feet of landscaped area. Proposed building elevations are shown in **Figure 2.0-11**. Further, development of the project would impact 85 oak trees, including four landmark oak trees on the site and the site of the proposed off-site sewer improvements on two adjacent parcels. The specifics on the oak tree impact and mitigation are discussed in Section 6.0, Biological Resources. All of these activities would affect the visual character of the site and adjacent parcels.

As shown on **Figure 2.0-5**, the project site is located between Alta Sierra Drive and Little Valley Road, with Alta Sierra Drive a main thoroughfare, resulting in high visibility from both approaches. The project site is set within a cluster of small-scale commercial retail operations surrounded by rural, wooded properties. Immediately north of site is a single-story, multi-tenant commercial center. These structures are set back from Alta Sierra Drive and appear as low-rise, single-story buildings set among trees. From Little Valley Road, views of these buildings are largely blocked by existing trees and vegetation. Farther north are heavily wooded rural residential properties. Immediately east of the site is Little Valley Road and a developed residential property located at the bottom of a small hill below the grade of the project site on the east side of the roadway. Rural residential uses dominate the landscape east of Little Valley Road, including the Alta Sierra residential subdivision. Immediately south of the project site is the Alta Sierra Market, with scattered rural residential properties located farther south. Alta Sierra Market is readily visible from the Alta Sierra Drive/Little Valley Road intersection. However, the building is single-story with a low roof and is not visually prominent. Immediately west of the project site is Alta Sierra Drive and an undeveloped, wooded parcel. Farther north/northwest along Alta Sierra Drive are other commercially developed properties consisting of a variety of uses. The project site is located within an established commercial center, and its development with a commercial use would be a logical expansion of the center and would be visually compatible with existing uses as viewed from Alta Sierra Drive. However, the project would be visually inconsistent with the scale and style of the existing structures and the nearby residential uses as viewed from Little Valley Road.

Figure 4.0-1 shows the location of a series of key viewpoints of the project site from the surrounding area. Photographs of the site in its existing condition, along with a visual simulation of the proposed development at each of these viewpoints, are provided in **Figures 4.0-2** through **4.0-5**. As shown, the proposed development would be clearly visible from viewpoints A and B but would be visually compatible with the adjacent commercial development and would not result in a substantial change in views. Viewpoint C represents views from the existing residential property located immediately east of the site as well as for motorists traveling northbound on Little Valley Road, which provides access to residential properties to the north and east. As shown in the figure, views at this viewpoint would change dramatically due to the scale of the proposed building and screening/retaining walls and the site's elevation above the roadway. This viewpoint shows an 18.5-foot building façade atop a retaining wall that is up to 12 feet in height, representing up to 30 feet of solid wall that would be visible along Little Valley Road. From viewpoint D, the proposed development would be almost entirely obscured by the existing trees and vegetation on the northeastern corner of the site and the adjacent parcel.

Per Section L-II 5.3, Design Review, of the Nevada County Zoning Regulations, the proposed project must be reviewed for consistency with applicable, adopted design standards, including the Western Nevada County Design Guidelines (WNCDDG), prior to issuance of development permits. The WNCDDG encourages environmentally sensitive site design that is consistent with the

¹ Surfaced area includes parking lot and driveway paved areas, hardscape surrounding building, sidewalks, ramps, and curbs.

4.0 AESTHETICS

overall architectural character of the project and community. Consistent with the WNCDG, the Alta Sierra project includes building materials and colors that would blend with the surrounding environment and landscape and help to screen the urban nature of the proposed building. The project features some architectural details along the side and rear exterior walls and screening/retaining wall including low stone veneer columns and an awning. However, the project does not incorporate sufficient architectural features such as windows, structural bays, roof overhangs, and other details to visually break up the appearance of the proposed exterior walls on some of the façades, particularly the walls of the proposed building facing Little Valley Road. The project also fails to comply with the WNCDG by proposing a building with a flat roofline, failing to use a height and scale that is compatible with that of surrounding development, and by failing to design the building as a group of simple forms to reduce its overall bulk.

MM AS-4.1.1a requires the addition of architectural features on the eastern and southern exterior walls and along the roofline to further break up the mass of the 30-foot-high structure. To provide further screening of the project site from the adjacent uses, particularly the residential uses to the east, the project proponent would be required to provide a 10-foot-wide landscape buffer in accordance with the Nevada County Code. The proposed landscaping plan shows the retention of eight oak trees and two pine trees along the east edge of the site and extensive landscaping along its entire perimeter with the exception of the access point on Alta Sierra Drive. **MM AS-4.1.1b** would require the project contractor to protect these and other trees on the site to ensure they are successfully retained after construction. In addition, as described previously, the project applicant has proposed two screening/retaining walls just inside of the landscape buffer. However, as proposed, a 30-foot-wide gap would occur between the two walls, which would not provide adequate screening of the site from the residential uses east of Little Valley Road. To further screen the project, mitigation measure **MM AS-4.1.1c** requires the addition of a third wall or extension of the currently proposed walls to close the gap.

The project would also include open space per County requirements and landscaping throughout the site that would serve as an additional buffer for adjacent uses. Implementation of mitigation measures **MM AS-4.1.1a** through **AS-4.1.1d** would reduce the project's anticipated visual impacts by requiring the addition of architectural features to further break up exterior walls and screening/retaining walls, requiring existing mature trees to be preserved, requiring a continuous wall to better screen the site from the adjacent roadway and residential uses, and requiring more aesthetically-pleasing signage.

Even with these measures, however, development of the Alta Sierra site as proposed would substantially change the existing visual character of the site particularly when viewed from the residential area to the east. As shown in the visual simulations in **Figures 4.0-2** through **4.0-5**, the combined retaining wall and rear façade of the building would still result in a substantial degradation of public views from Little Valley Road. The site is considered to be visually sensitive, as neighbors and community members consider the existing wooded character of the site to be of high visual quality, numerous public comments have been received on the project expressing concern with the change in visual character, and there is a substantial level of visual change caused by the project from a wooded, undeveloped condition to a developed state. Given the substantial degradation and change of public views of a visually sensitive site, this would be a significant impact. A reduced-size project would likely be able to reduce the severity of this impact. However, the design of such a change to the project would be subject to design and fiscal constraints that are beyond the scope of this Draft EIR. Therefore, a reduced project alternative is addressed in Chapter 16.0, Alternatives of this Draft EIR, for consideration by the Planning Commission. Given the area available for landscaping and size of the façades, additional landscaping would likely not reduce the perceived scale of the building from Little

Valley Road. No other mitigation measures are available to eliminate or substantially reduce this impact; therefore, this impact would be **significant and unavoidable**.

Mitigation Measures

MM AS-4.1.1a The proposed building design shall be modified to better comply with the Western Nevada County Design Guidelines to create greater visual interest and to break up the mass of building and the roofline. Design modifications could include the incorporation of structural bays, roof overhangs, awnings, and other details along the buildings eastern and southern exterior walls as well as varying the roofline so that it transitions from the height of adjacent buildings to the maximum height of the proposed building and articulating the flat roofline with cornices. No windows shall be added to the buildings eastern or southern exterior walls.

Timing/Implementation: Prior to approval of improvement plans

Enforcement/Monitoring: Nevada County Planning Department

MM AS-4.1.1b The 17 existing mature trees on the project site and off-site improvement area that will be retained after construction shall be identified on all grading and improvement plans as "trees to be retained." Prior to grading permit issuance, the Planning Department shall verify that this requirement has been met. Additionally, the developer shall flag the trees in the field that will be retained following construction and shall provide and maintain adequate protection measures for the trees for the duration of all site construction activities. These measures shall include providing highly visible protective barriers around the trees such plastic construction fencing and prohibiting vehicle access and storage of materials, equipment or waste within the protective barriers. The Building Department shall verify that the trees to be retained have been properly marked in the field and protected during the first grading inspection. Construction personnel shall be made aware of these protected trees and the significance of the field markings and protection measures by the general contractor prior to commencing construction activities to minimize potential direct and indirect impacts.

Timing/Implementation: Prior to grading permit issuance and throughout construction

Enforcement/Monitoring: Nevada County Building Department and Planning Department

MM AS-4.1.1c To minimize potential conflicts between the commercial use of this site and existing residential uses east of Little Valley Road, the developer shall revise project plans to either (1) add a third six foot tall split block face wall designed consistently with other existing walls in the area that will fill the gap shown on the preliminary plans or (2) connect the two proposed screen walls to completely screen the parking lot area. Prior to issuance of final occupancy, the Planning Department shall verify in the field that the wall has been constructed consistent with the approved plans.

4.0 AESTHETICS

Timing/Implementation: Prior to grading permit issuance and throughout construction

Enforcement/Monitoring: Nevada County Building Department and Planning Department

MM AS-4.1.1d The developer shall revise project plans and elevations to include the use of channel letter signage. Cabinet-style signage shall be prohibited. Prior to issuance of final occupancy, the Planning Department shall verify in the field that project signage is consistent with the approved plans.

Timing/Implementation: Prior to approval of final occupancy

Enforcement/Monitoring: Nevada County Planning Department

Create New Sources of Light and Glare (Standard of Significance 4)

Impact 4.1.2(AS) Development of the Alta Sierra project site as proposed would introduce new sources of light and glare. **(Less than Significant with Mitigation Incorporated)**

The Alta Sierra project would introduce a variety of building materials to the site. Glass, roofing, and car windshields, among others, have the potential to reflect light and create glare visible for some distance from the site. However, as discussed under Impact 4.1.1(AS) above, the proposed project would be reviewed for consistency with the Western Nevada County Design Guidelines prior to issuance of a development permit. The guidelines require that new projects avoid bare metal, highly reflective surfaces (glass, metallic paint, etc.), illuminated roofing, and high contrast or brightly colored glazed tile. Compliance with the design guidelines would substantially reduce the potential for glare from the proposed project. Impacts from glare would be **less than significant**.

The Alta Sierra project would also introduce new sources of light that currently do not exist on the project site. The nearest residential uses sensitive to light and glare in the project area are located on lots to the east and southeast. The closest home is located approximately 100 feet from the subject property line to the east. Other homes are within 180 to 600 feet of the project site. The plans for the proposed project identify multiple downward-facing wall light fixtures mounted along the parapets of the building, as well as two pole-mounted lights in the parking lot. The proposed signage would be externally illuminated. The Nevada County Zoning Ordinance's standards for exterior lighting require such lighting to be shielded and directed downward to prevent the light source or lens from being visible from adjacent properties and roadways. The project developer has submitted a site lighting plan (**Figure 4.0-6**). This plan includes a photometric detail showing the amount of light spill from each individual light. Based on a review of this plan, the majority of the lighting from the project site will be kept within the property boundaries, but there are three areas where light is shown to spill off-site. Therefore, this impact would be **potentially significant**.

The County's Land Use and Development Code Section L-II 4.2.8(D)(2) states that "all outdoor lighting fixtures shall be fully shielded to prevent the light source or lens from being visible from adjacent properties and roadways..." According to the site lighting plan submitted by the applicant, all light fixtures are designed to meet International Dark Sky requirements, including being fully shielded. With shielded lighting, the Alta Sierra project would be consistent with the County Lighting Ordinance and would not be anticipated to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. However, implementation of mitigation measures **MM AS-4.1.2a** and **MM AS-4.1.2b** would be necessary to ensure that project lighting would not expose adjacent properties and roadways to substantial

light or glare, consistent with the Nevada County Land Use and Development Code. With mitigation, this impact would be **less than significant**.

Mitigation Measures

MM AS-4.1.2a Prior to building permit issuance, the developer shall submit a final Site Lighting Plan/Photometric Detail that demonstrates that all light spill will be retained on the project site. Potential methods for reducing light trespass onto neighboring roads and properties include replacing the two 400-watt light fixtures located on the southwest and southeast corners of the building with light fixtures of lesser wattage and/or providing additional screening of those features. Additionally, for the northern parking lot lighting, similar or alternative methods, such as reducing the wattage of the lighting fixture or moving the pole farther into the interior of the site, shall be utilized to ensure all new lighting and glare is kept on site. The developer shall install and maintain all lighting consistent with the approved Final Site Lighting Plan. Prior to issuance of final occupancy, the Planning Department shall perform a site visit, during the dark hours, to verify that the installed lighting does not trespass onto neighboring roads or properties.

Timing/Implementation: Prior to issuance of building permit and prior to issuance of final occupancy

Enforcement/Monitoring: Nevada County Planning Department

MM AS-4.1.2b All lighting for advertising must meet the County Lighting and Signage Ordinance requirements. Internally illuminated signage shall be prohibited. All lighting for exterior signage or advertising shall be top mounted light fixtures which shine light downward directly onto the sign. Said lighting shall be fully shielded consistent with International Dark Sky standards. Prior to building permit issuance, the applicant shall submit a final signage plan that eliminates any reference to internally lighted signage and provides details for establishing top mounted lighting for both the monument and wall signs. Additionally, any proposed sign lighting shall be shown and taken into account in the photometric detail in the revised project site lighting plan as required by mitigation measure MM AS-4.1.2a. Prior to issuance of final occupancy, the Planning Department shall perform a site inspection to ensure that the sign lighting is installed consistent with this mitigation measure and the County Zoning Code standards.

Timing/Implementation: Prior to issuance of building permit and prior to issuance of final occupancy

Enforcement/Monitoring: Nevada County Planning Department

4.0 AESTHETICS

4.2 PENN VALLEY SITE

4.2.1 PROJECT-SPECIFIC SETTING

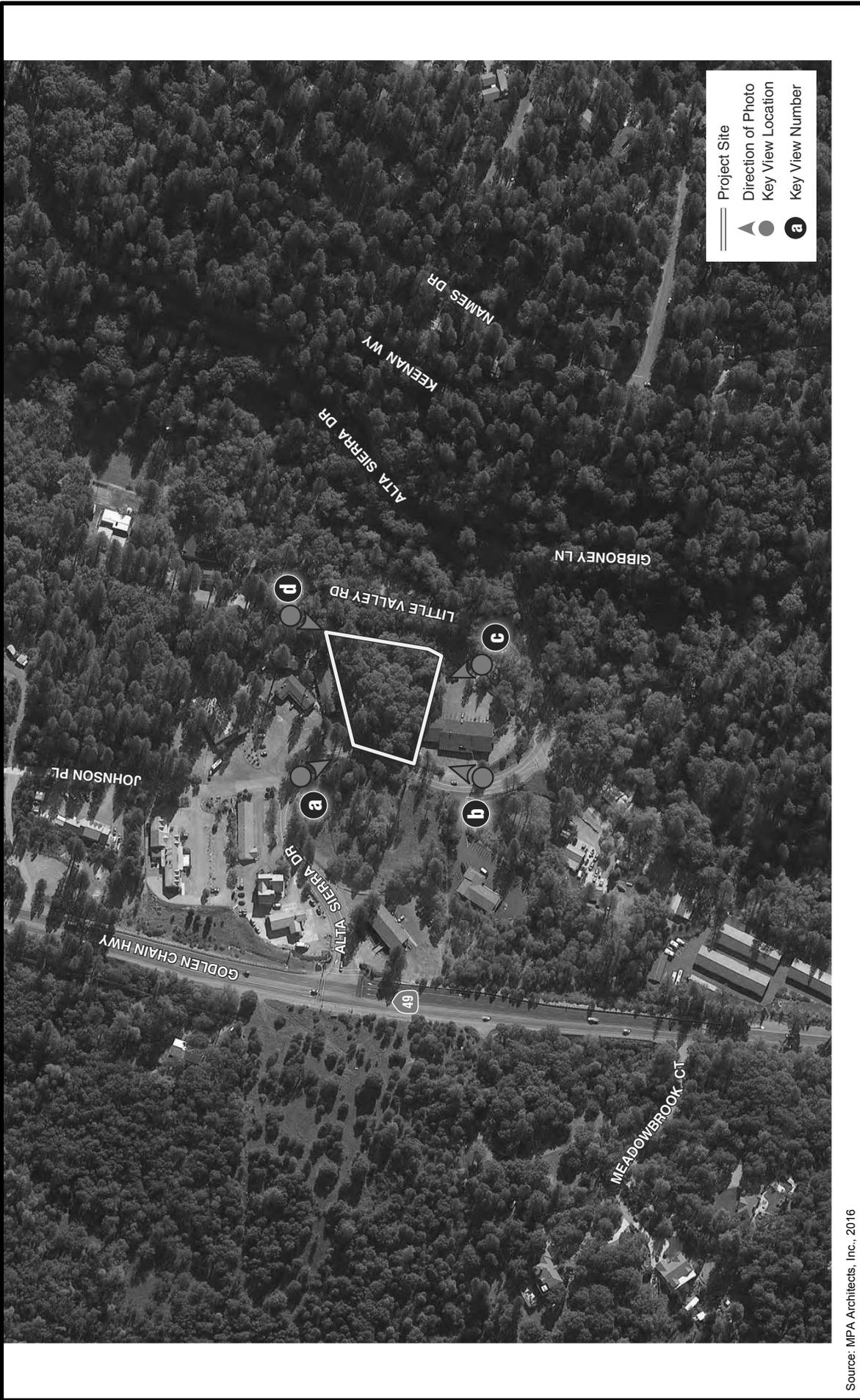
Visual Character of the Site

The Penn Valley site is in the Sierra Nevada foothills approximately 6 miles west of Grass Valley on a 1.2-acre portion of a 5.95-acre parcel. The general topography of the property is characterized by slightly rolling and flat terrain. Average elevation in the project area is approximately 1,400 feet above mean sea level. The change in grade over the project site is approximately 7 feet.

Vegetation on the site is dominated by annual grassland and a scattering of trees, including valley oak, Oregon ash, white alder, and arroyo willow along the perimeter of the site. In addition, Squirrel Creek is located on the 5.95-acre parcel, but not within the proposed 1.2-acre project area. The area between the stream and proposed development includes flat terrain that is vegetated primarily with non-native grass species. An unnamed drainage on the northern border of the project site flows into Squirrel Creek.

The Penn Valley site is located in an area with commercial development, some small-lot single-family homes, and areas of vacant land. The County does not identify the site as being within a scenic corridor or a scenic viewshed, nor is the site located along a state scenic highway.

Photographs of the Penn Valley site from two key viewpoints in the vicinity, as well as a map showing the location of these viewpoints, are provided in **Figures 4.0-7** through **4.0-9**.



Source: MPA Architects, Inc., 2016



Not To Scale

FIGURE 4.0-1
Alta Sierra Site Key Viewpoints Location Map

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For comparative purposes, site photographs are utilized to demonstrate the general character at different points of the project area. These simulations are subject to change and are intended to provide the reader with information on the form, size, and scale of the proposed improvements within the project area.

Source: MPA Architects, Inc., 2016

FIGURE 4.0-2
Alta Sierra Site Viewpoint A

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*For comparative purposes, site photographs are utilized to demonstrate the general character at different points of the project area. These simulations are subject to change and are intended to provide the reader with information on the form, size, and scale of the proposed improvements within the project area.

Source: MPA Architects, Inc., 2016

FIGURE 4.0-4
Alta Sierra Site Viewpoint C

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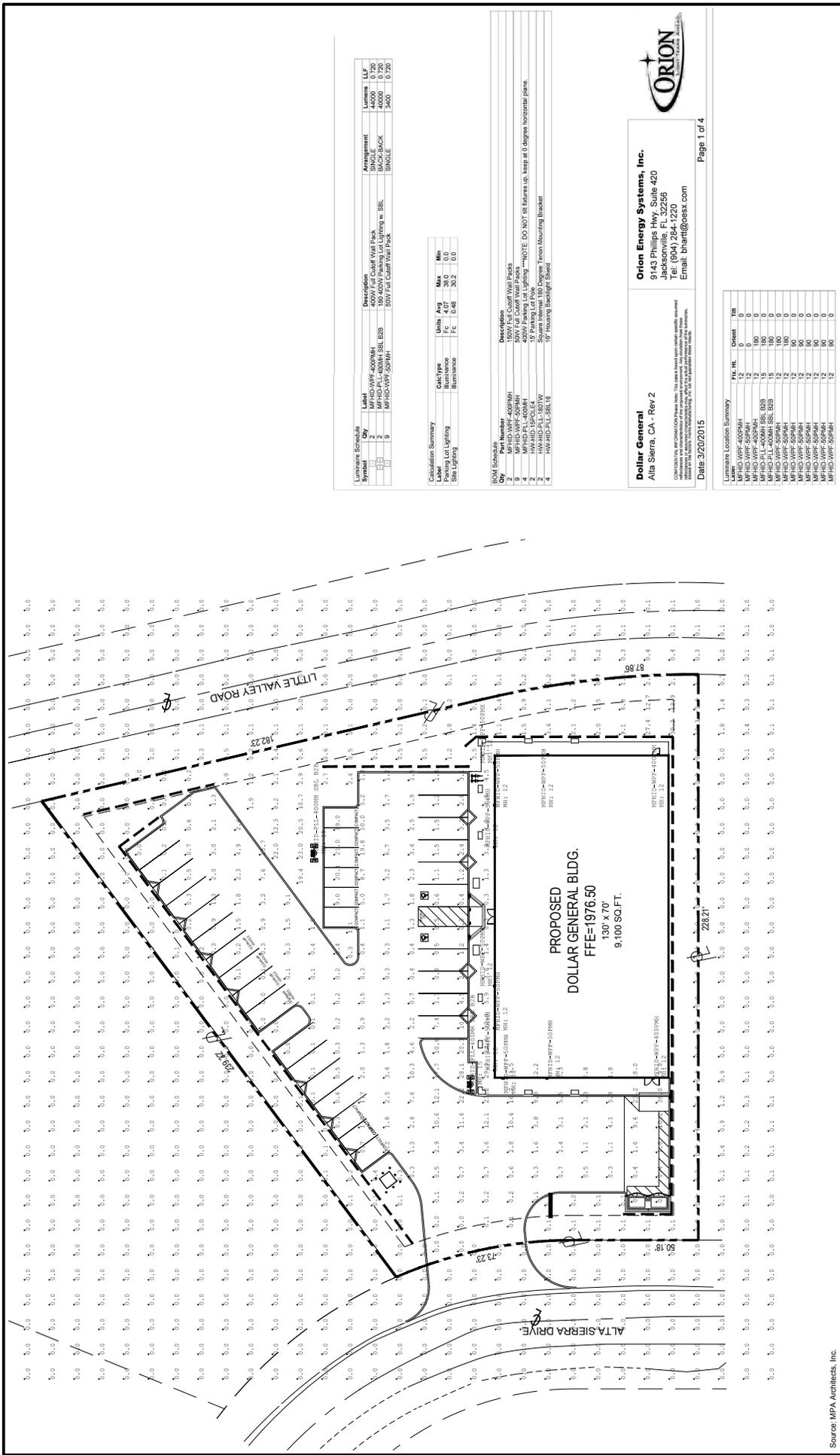


*For comparative purposes, site photographs are utilized to demonstrate the general character at different points of the project area. These simulations are subject to change and are intended to provide the reader with information on the form, size, and scale of the proposed improvements within the project area.

Source: MPA Architects, Inc., 2016

FIGURE 4.0-5
Alta Sierra Site Viewpoint D

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7/1 CSIW/KNW/ada County of DeKalb General EIR/Figures

Luminaire Schedule	Label	Qty	Description	Lumens	LF
1	MPHD-WVF-4000AH	12	1500W Full Cutoff Wall Packs	40000	0.20
2	MPHD-PLL-4000H SBL B2B	15	1500 4000W Parking Lot Lighting w. SBL	40000	0.20
3	MPHD-WVF-5000PH	12	500W Full Cutoff Wall Pack	3400	0.20

Calculation Summary	CalcType	Units	Avg	Max	Min
Parking Lot Lighting	Footcandle	Fc	0.97	30.0	0.0
Site Lighting	Footcandle	Fc	1.48	30.2	0.0

Item Schedule	Item Number	Description
1	MPHD-WVF-4000AH	1500W Full Cutoff Wall Packs
2	MPHD-PLL-4000H SBL B2B	1500 4000W Parking Lot Lighting w. SBL
3	MPHD-WVF-5000PH	500W Full Cutoff Wall Pack
4	MPHD-PLL-SBL W	15' Parking Lot Pole
4	MPHD-PLL-SBL W	15' Pole Mounting Bracket
4	MPHD-PLL-SBL W	15' Pole Mounting Bracket

Orion Energy Systems, Inc.
 9143 Phillips Hwy, Suite 420
 Jacksonville, FL 32256
 Tel: (904) 254-2220
 Email: brant@oesk.com

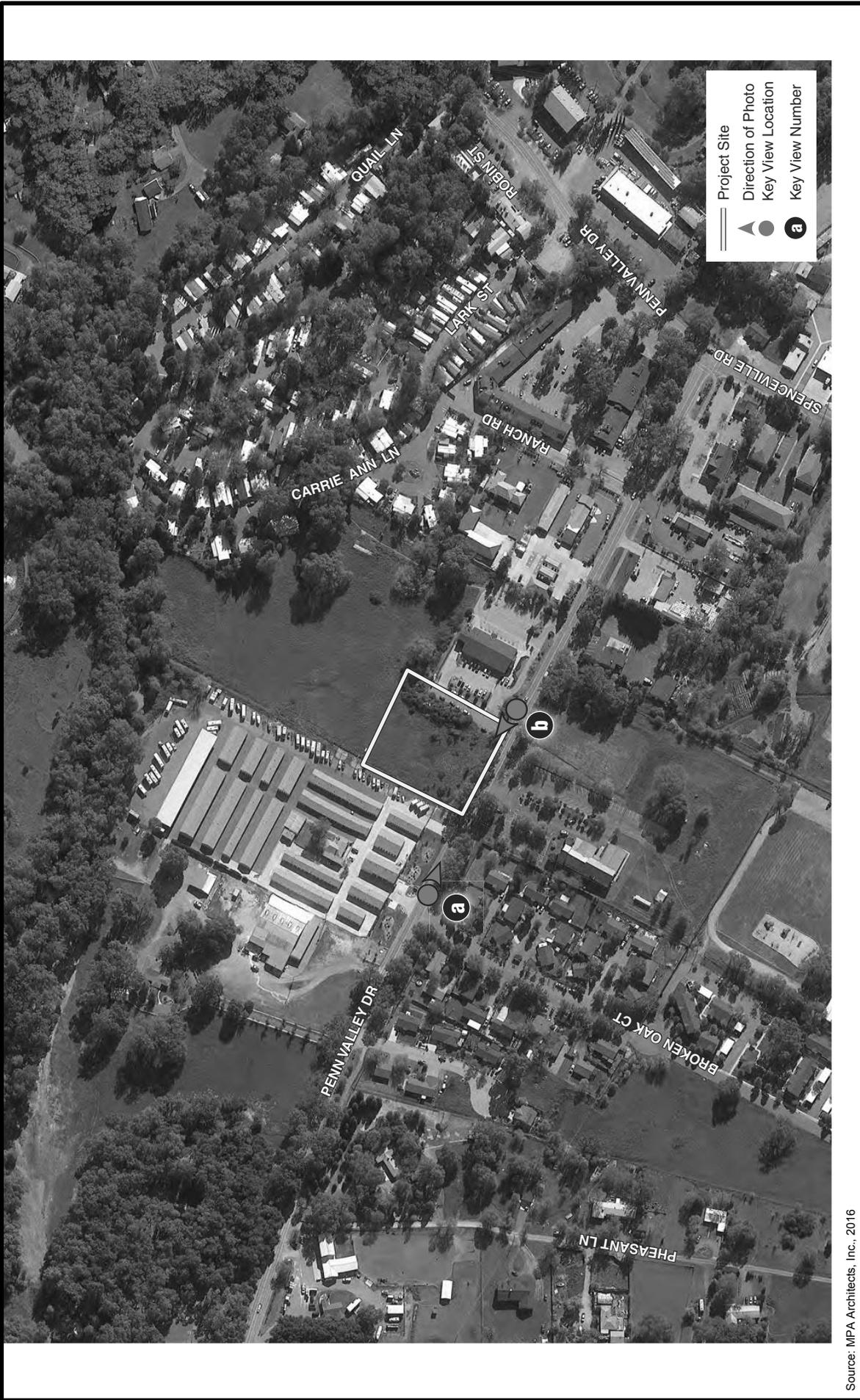
Dollar General
 Alta Sierra, CA - Rev 2

Date: 3/20/2015 Page 1 of 4

Luminaire Location Summary	Item	Qty	Orientation	Item
MPHD-WVF-4000AH	12	0		0
MPHD-PLL-4000H SBL B2B	15	180		0
MPHD-WVF-5000PH	12	180		0
MPHD-PLL-SBL W	12	180		0
MPHD-Pole Mounting Bracket	12	180		0
MPHD-WVF-5000PH	12	90		0
MPHD-WVF-5000PH	12	90		0
MPHD-WVF-5000PH	12	90		0
MPHD-WVF-5000PH	12	90		0
MPHD-WVF-5000PH	12	90		0

FIGURE 4.0-6
 Proposed Lighting Plan – Alta Sierra
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Source: MPA Architects, Inc.
 Not To Scale



Source: MPA Architects, Inc., 2016



Not To Scale

FIGURE 4.0-7
Penn Valley Site Key Viewpoints Location Map

Michael Baker
INTERNATIONAL



*For comparative purposes, site photographs are utilized to demonstrate the general character at different points of the project area. These simulations are subject to change and are intended to provide the reader with information on the form, size, and scale of the proposed improvements within the project area.

Source: MPA Architects, Inc., 2016

FIGURE 4.0-8
Penn Valley Site Viewpoint A

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*For comparative purposes, site photographs are utilized to demonstrate the general character at different points of the project area. These simulations are subject to change and are intended to provide the reader with information on the form, size, and scale of the proposed improvements within the project area.

Source: MPA Architects, Inc., 2016

FIGURE 4.0-9
Penn Valley Site Viewpoint B

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Visual Character of Surrounding Uses

As shown in **Figure 2.0-6**, the project site is located in an area with existing development. To the south is Penn Valley Drive, with the Penn Valley Seventh-day Adventist Church and the Penn Valley Gardens residential subdivision farther to the south. A US Post Office, a gas station, and the Penn Valley Shopping Center are located east of the site. Northeast of the site is vacant land, followed by the Creekside Village mobile home park. Directly north of the site is vacant land and SR 20. Penn Valley Mini Storage is located west of the site.

Light and Glare

The Penn Valley site is located adjacent to a US Post Office and the Penn Valley Mini Storage. Farther east of the site are a gas station and the Penn Valley Shopping Center. All of these uses may generate daytime glare and nighttime lighting levels in the area. However, the County has standards to provide for efficient, safe, and attractive outdoor lighting while minimizing nighttime light pollution and energy waste, as well as design standards which require that projects avoid bare metal, highly reflective surfaces (glass, metallic paint, etc.), illuminated roofing, and high contrast or brightly colored glazed tile. These requirements assist in the reduction of daytime glare and nighttime lighting in the Penn Valley area.

4.2.2 REGULATORY FRAMEWORK

Penn Valley Village Center Area Plan

Chapter III of the Penn Valley Village Center Area Plan includes design guidelines for commercial, industrial, multi-family, and public use development. The guidelines pertain to site planning, building design, signage, lighting design, landscape design, pedestrian and bicycle access, and multi-family residential development (Nevada County 2000).

4.2.3 IMPACTS AND MITIGATION MEASURES

Adversely Affect a Scenic Vista and/or Substantially Degrade the Visual Character of the Site (Standards of Significance 1 and 3)

Impact 4.2.1(PV) Development of the Penn Valley project site as proposed would convert vacant land to commercial development. Such a conversion would fundamentally alter the visual character of a portion of the site. **(Less than Significant)**

There are no officially designated scenic vistas in the project area. However, the project is located in Penn Valley and as stated previously, views of valleys are considered an important factor in Nevada County's scenic quality.

The Penn Valley project would convert approximately 1.2 acres of the project site from undeveloped land to a commercial development. New uses would include a 9,100-square-foot, 18- to 27-foot-high commercial building; 24,511 square feet of surfaced area with 46 parking spaces; and 7,039 square feet of landscaped area. All of these components would affect the visual character of the site. Elevations of the proposed building are shown in **Figure 2.0-12**.

Figure 4.0-7 shows the location of two key viewpoints of the project site from the surrounding area. Photographs of the site in its existing condition, along with a visual simulation of the proposed development at each of these viewpoints, are provided in **Figures 4.0-8** and **4.0-9**. As shown, the

4.0 AESTHETICS

proposed development would be clearly visible to motorists and pedestrians traveling along Penn Valley Drive in both directions. However, given the commercially developed nature of the area, the proposed development would be visually compatible and would not represent a substantial negative change to views in the area.

Per Section L-II 5.3, Design Review, of the Nevada County Zoning Ordinance, the Penn Valley project would be reviewed for consistency with applicable, adopted design standards, including the Western Nevada County Design Guidelines and the design guidelines in the Penn Valley Village Center Area Plan, prior to issuance of development permits. Both the Western Nevada County Design Guidelines and the Penn Valley Village Center Area plan encourage environmentally sensitive site design that is consistent with the overall architectural character of the project and community. Consistent with the design guidelines, the Penn Valley project was designed using building materials and colors that would blend with the surrounding environment and landscape and help to screen the urban nature of the proposed building. As shown in **Figure 2.0-12**, the building's exterior walls would incorporate architectural features to increase visual interest. These features include varying rooflines, building materials and colors, awnings, and decorative building-mounted lighting fixtures and door hardware.

In addition, the project would include open space per County requirements and would include landscaping throughout the site that would serve as a buffer for adjacent uses.

The project would add to a change in the existing scenic quality of Penn Valley. However, this change would be consistent with existing adjacent uses and the existing aesthetic qualities of the area. The site is not considered visually sensitive given the surrounding context of development in the area. Further, compliance with the applicable design guidelines and incorporation of open space and landscaping would reduce the project's visual intrusion by blending the proposed improvements with the surrounding environment. Therefore, development of the Penn Valley site as proposed would result in a **less than significant** impact to scenic vistas and visual character.

Mitigation Measures

None required.

Create New Sources of Light and Glare (Standard of Significance 4)

Impact 4.2.2(PV) Development of the Penn Valley project site as proposed would introduce new sources of light and glare. **(Less than Significant with Mitigation Incorporated)**

Development of the Penn Valley project site as proposed would introduce a variety of building materials to the site that may create glare. However, the proposed project would be reviewed for consistency with the Western Nevada County Design Guidelines, as well as the design guidelines contained in the Penn Valley Village Center Area Plan, prior to issuance of development permits. Compliance with the design guidelines would substantially reduce the potential for glare from the proposed project. Impacts from glare would be **less than significant**.

The proposed project would introduce new sources of light that currently do not exist on the Penn Valley site. The nearest residential uses sensitive to light and glare in the project area are located on lots to the southwest. The closest homes are located approximately 150 feet from the subject property line to the southwest. The plans for the proposed project identify 15 downward-facing wall light fixtures mounted along the parapets of the building, as well as 5 pole-mounted parking lot lights. The Nevada County Zoning Ordinance's standards for exterior lighting require such lighting to be shielded and directed downward to prevent the light source or lens from being

visible from adjacent properties and roadways. The lighting plan for the Penn Valley site submitted by the project applicant is shown in **Figure 4.0-10**. Based on a review of this plan, the majority of the lighting from the project site will be kept within the property boundaries, but there are areas identified where light is shown to spill off-site. Therefore, this impact would be **potentially significant**.

The County’s Land Use and Development Code Section L-II 4.2.8(D)(2) states that “all outdoor lighting fixtures shall be fully shielded to prevent the light source or lens from being visible from adjacent properties and roadways...” According to the site lighting plan prepared by the applicant, all light fixtures are designed to meet International Dark Sky requirements, including being fully shielded. With shielded lighting, the Penn Valley project would be consistent with the County Lighting Ordinance and would not be anticipated to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. However, implementation of mitigation measures **MM PV-4.2.2a and PV-4.2.2b** would be necessary to ensure that project lighting would not expose adjacent properties and roadways to of substantial light or glare, consistent with the Nevada County Land Use and Development Code. With mitigation, this impact would be **less than significant**.

Mitigation Measures

MM PV-4.2.2a Prior to building permit issuance, the developer shall submit a final Site Lighting Plan/Photometric Detail that demonstrates that all light spill will be retained on the project site. Potential methods for reducing light trespass onto neighboring roads and properties include replacing the 400-watt parking lot light fixtures located on the south and east with light fixtures of lesser wattage, and/or providing additional screening of those features, and/or moving light poles farther into the interior of the site. The developer shall install and maintain all lighting consistent with the approved Final Site Lighting Plan. Prior to issuance of final occupancy, the Planning Department shall perform a site visit, during the dark hours, to verify that the installed lighting does not trespass onto neighboring roads or properties.

Timing/Implementation: Prior to issuance of building permit and prior to issuance of final occupancy

Enforcement/Monitoring: Nevada County Planning Department

MM PV-4.2.2b All lighting for advertising must meet the County Lighting and Signage Ordinance requirements. Internally illuminated signage shall be prohibited. All lighting for exterior signage or advertising shall be top mounted light fixtures which shine light downward directly onto the sign. Said lighting shall be fully shielded consistent with International Dark Sky standards. Prior to building permit issuance, the applicant shall submit a final signage plan that eliminates any reference to internally lighted signage and provides details for establishing top mounted lighting for both the monument and wall signs. Additionally, any proposed sign lighting shall be shown and taken into account in the photometric detail in the revised project site lighting plan as required by mitigation measure MM PV-4.2.2a. Prior to issuance of final occupancy, the Planning Department shall perform a site inspection to ensure that the sign lighting is installed consistent with this mitigation measure and the County Zoning Code standards.

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Timing/Implementation: Prior to issuance of building permit and prior to issuance of final occupancy

Enforcement/Monitoring: Nevada County Planning Department

4.3 ROUGH AND READY HIGHWAY SITE

4.3.1 PROJECT-SPECIFIC SETTING

Visual Character of Site

The Rough and Ready Highway project site has an existing commercial building that would be demolished as a part of project development. The project site lies on the west slope of the Sierra Nevada foothills at an elevation of $\pm 2,500$ feet and is a fairly level parcel. The site contains mostly non-native varieties of horticultural plants, with the exception of one ponderosa pine and three gray pines.

The site is located in an area developed with rural residential single-family homes, higher-density residential uses including a transitional housing facility and mobile home parks, and areas of vacant undeveloped land. The County does not identify the site as being within a scenic corridor or a scenic viewshed, nor is the site located along a state scenic highway.

Photographs of the Rough and Ready Highway project site from a series of key viewpoints in the vicinity, as well as a map showing the location of these viewpoints, are provided in **Figures 4.0-11** through **4.0-14**.

Visual Character of Surrounding Uses

The project site is located in a rural residential neighborhood; however, as noted above, there is an existing commercial building on the property. Adjacent land uses include two single-family residences and other rural residential uses to the west. Directly east of the site is West Drive and single-family residential uses, followed by a small mobile home park. South of the site are single-family residential uses. Across Rough and Ready Highway are single-family residential uses and transitional housing, followed by vacant undeveloped land farther to the north. In general, the project area and lands further east and southeast are largely built out with residential uses on relatively small parcels. Land further north and west of the project area is more rural with lower densities and large areas of undeveloped land.

Light and Glare

Given the rural character of the Rough and Ready Highway site and the surrounding area, it is expected that only minimal nighttime lighting is visible on or near the site associated with existing residences and vehicles traveling on area roadways. Similarly, there is daytime glare visible in the area associated with glass and other reflective building materials and vehicle windows.

4.3.2 REGULATORY FRAMEWORK

There are no additional regulations, policies, or standards that pertain to the Rough and Ready Highway site other than those described in Subsection 4.0.2, above.

4.3.3 IMPACTS AND MITIGATION MEASURES

Adversely Affect a Scenic Vista and/or Substantially Degrade the Visual Character of the Site (Standards of Significance 1 and 3)

Impact 4.3.1(RR) Development of the Rough and Ready Highway project site as proposed would maintain the existing commercial use but at a greater scale. Given the rural residential character of the surrounding area, this conversion would be considered to substantially degrade the visual character of the project area. **(Significant and Unavoidable)**

A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. While the General Plan does not establish specific scenic vistas in the county, it does identify visual resources that characterize Nevada County. These include the rolling vistas of foothills, valleys, mountains, meadows, forests, wetlands, and habitats unique to the Sierras. Additionally, scenic views within the county are identified as mountain peaks such as Castle Peak, vistas of Donner Lake, and the gorge of the South Fork of the Yuba River (Nevada County 1996a, p. 18-1).

There are no officially designated scenic vistas in the area of the Rough and Ready Highway site. However, the site is located in the foothills of the Sierra Nevada, views of which are considered an important factor in the county's scenic quality.

Currently, an existing single-story commercial building and associated parking lot are on the project site. The proposed Rough and Ready Highway project would maintain the existing type of use on the 1.02-acre project site as a commercial development. The proposed development includes construction of a 9,100-square-foot, 18- to 27-foot-high commercial building, along with 19,354 square feet of surfaced area, 29 parking spaces, and 8,451 square feet of landscaped area. The proposed project's building elevations are shown in **Figure 2.0-13**. The proposed development would be of substantially greater height, size, and scale compared to the existing single-story building and immediately adjacent development, which consists of one-story, single-family detached homes in a rural residential setting. It would also be substantially taller than development on the north side of Rough and Ready Highway, which consists of a combination of one-story, single-family homes and higher-density residential uses including a transitional housing facility and mobile home parks (see **Figure 2.0-7**). Surrounding the area are rural residential properties and large expanses of wooded vacant land as well as some vineyards directly to the south.

Figure 4.0-11 shows the location of three key viewpoints of the project site from the surrounding area. Photographs of the site in its existing condition, along with a visual simulation of the proposed development at each of these viewpoints are provided in **Figures 4.0-11** through **4.0-14**. As shown, given the rural nature of the surrounding area, the proposed development would substantially change the visual character and quality of the site and would degrade views of the site from the immediately surrounding residential uses.

The proposed development would be reviewed for consistency with applicable, adopted design standards, including the Western Nevada County Design Guidelines, prior to issuance of development permits. The design guidelines encourage environmentally sensitive site design that is consistent with the overall architectural character of the project and community. The Rough and Ready Highway project includes building materials and colors that would blend with the surrounding environment and landscape and help to screen the urban nature of the proposed building. As shown in **Figure 2.0-13**, the building's exterior walls would incorporate architectural

4.0 AESTHETICS

features to increase visual interest. These features include varying rooflines, building materials and colors, awnings, and decorative building-mounted lighting fixtures and door hardware. In addition, the project would preserve a portion of the site as open space per County requirements and would include landscaping throughout the site that would serve as a buffer for adjacent uses. However, the proposed reduction in parking standards allows a larger building design, and the proposed structure would be substantially larger than any other building in the immediate vicinity. Development of the Rough and Ready Highway site as proposed would result in a building that is out of scale with the development in the area and would substantially change views. Given the rural residential nature of the area, such a change would be considered to degrade the visual character and quality of the site and its surroundings.

The existing scenic quality of the project area is largely defined by small-scale rural residential development, which comprises the neighborhood. The level of viewer exposure from public roadways and concern about changes in the viewshed from Rough and Ready Highway and West Drive is high, resulting in visual sensitivity of the site to larger forms that are out of scale with the existing neighborhood. A reduced-size project would likely be able to reduce the severity of this impact. However, the design of such a change to the project would be subject to design and fiscal constraints that are beyond the scope of this Draft EIR. Therefore, a reduced building alternative is addressed in Chapter 16.0, Alternatives of this Draft EIR for consideration by the Planning Commission. Increasing the size of the property to result in less coverage is not possible due to adjacent land ownership. Blocking views of the building from the roadway would not meet with the commercial nature of the project and the need for visibility to the travelling public. The design of the structure meets County standards; however, the impact is substantially adverse in terms of the proportional size and scale of the structure relative to other smaller structures in the vicinity and the visual sensitivity of the site. Given that there are no feasible mitigation measures available to reduce this impact, this impact would be **significant and unavoidable**.

Mitigation Measures

None available.

Create New Sources of Light and Glare (Standard of Significance 4)

Impact 4.3.2(RR) Development of the Rough and Ready Highway project site as proposed would introduce new sources of light and glare. **(Less Than Significant with Mitigation Incorporated)**

Development of the Rough and Ready Highway site as proposed would introduce a variety of building materials to the site that may create glare. However, the proposed project would be reviewed for consistency with the Western Nevada County Design Guidelines prior to issuance of development permits. Compliance with the design guidelines would substantially reduce the potential for glare from the proposed project by discouraging the use of reflective materials and requiring materials to be painted using a neutral color palette. Impacts from glare would be **less than significant**.

As stated previously, there is an existing commercial building on the site. The existing use does not have parking lot pole-mounted lights. The only outdoor lighting appears to be spot lights mounted on the building exterior. All of this lighting would be removed with demolition of the existing building.

Implementation of the proposed project would introduce new sources of light that currently do not exist on the project site. The nearest residential uses sensitive to light and glare in the project area are single-family homes located immediately south and west of the site. The plans for the

proposed project identify 11 downward-facing wall light fixtures mounted along the parapets of the building, as well as 2 pole-mounted parking lot lights. The Nevada County Zoning Ordinance includes standards for exterior lighting that require such lighting to be shielded and directed downward to prevent the light source or lens from being visible from adjacent properties and roadways. The lighting plan for the Rough and Ready Highway site provided by the project applicant is shown in **Figure 4.0-15**. Based on a review of this plan, the majority of the lighting from the project site will be kept within the property boundaries, but there are areas identified where light is shown to spill off-site. Therefore, this impact would be **potentially significant**.

The County's Land Use and Development Code Section L-II 4.2.8(D)(2) states that "all outdoor lighting fixtures shall be fully shielded to prevent the light source or lens from being visible from adjacent properties and roadways..." According to the site lighting plan prepared by the applicant, all light fixtures are designed to meet International Dark Sky requirements, including being fully shielded. With shielded lighting, the Rough and Ready Highway project would be consistent with the County Lighting Ordinance and would not be anticipated to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. However, implementation of mitigation measures **MM RR-4.3.2a and RR-4.3.2b** would be necessary to ensure that project lighting would not expose adjacent properties and roadways to of substantial light or glare, consistent with the Nevada County Land Use and Development Code. With mitigation, this impact would be **less than significant**.

Mitigation Measures

MM RR-4.3.2a Prior to building permit issuance, the developer shall submit a final Site Lighting Plan/Photometric Detail that demonstrates that all light spill will be retained on the project site. Potential methods for reducing light trespass onto neighboring roads and properties include light fixtures of lesser wattage, and/or providing additional screening of those features, and/or moving light poles farther into the interior of the site. The developer shall install and maintain all lighting consistent with the approved Final Site Lighting Plan. Prior to issuance of final occupancy, the Planning Department shall perform a site visit, during the dark hours, to verify that the installed lighting does not trespass onto neighboring roads or properties.

Timing/Implementation: Prior to issuance of building permits and prior to issuance of final occupancy

Enforcement/Monitoring: Nevada County Planning Department and Building Department

MM RR-4.3.2b All lighting for advertising must meet the County Lighting and Signage Ordinance requirements. Internally illuminated signage shall be prohibited. All lighting for exterior signage or advertising shall be top mounted light fixtures which shine light downward directly onto the sign. Said lighting shall be fully shielded consistent with International Dark Sky standards. Prior to building permit issuance, the applicant shall submit a final signage plan that eliminates any reference to internally lighted signage and provides details for establishing top mounted lighting for both the monument and wall signs. Additionally, any proposed sign lighting shall be shown and taken into account in the photometric detail in the revised project site lighting plan as required by mitigation measure MM RR-4.3.2a. Prior to issuance of final occupancy, the Planning Department shall perform a site inspection to ensure that the sign

4.0 AESTHETICS

lighting is installed consistent with this mitigation measure and the County Zoning Code standards.

Timing/Implementation: Prior to issuance of building permit and prior to issuance of final occupancy

Enforcement/Monitoring: Nevada County Planning Department

4.4 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

CUMULATIVE SETTING

The cumulative setting for visual resources consists of each of the project sites, as well as all existing, approved, proposed, and reasonably foreseeable development in the visible range of each project site.

Alta Sierra Site: The cumulative setting for the Alta Sierra site is characterized by rural commercial development, hillside residential development, and open space. To guide the future uses in the area, the Nevada County General Plan designates the immediate area as a Rural Center with commercially designated land uses (Highway Commercial [HC] and Neighborhood Commercial [NC]) to the immediate north, south, and west of the site. Surrounding the Rural Center are properties identified with the General Plan land use designation of Planned Residential Community (PRC) to the east, Estate (EST) to the south and west, and Urban Medium Density (UMD) to the north. As shown in **Table 17.0-1** in Section 17.0, Other CEQA Considerations, the closest approved project in the surrounding area is Forest Springs Mobile Home Park, which is located approximately 1,800 feet north of the Alta Sierra Rural Center and approximately 1.0 mile from the project site. Hundreds of trees were recently removed from this site as the project began construction, and the tree removal is highly visible from SR 49. However, the Dollar General site is not readily visible to travelers along SR 49 as the project site is approximately 0.10 of a mile from and approximately 50 feet lower in elevation than SR 49, which is the major public view corridor of the Forest Springs Mobile Home Park. Due to these factors and the intervening development on SR 49, these projects lack any substantive visual connection.

Penn Valley Site: The cumulative setting for the Penn Valley site is characterized by commercial development, medium-density residential development, and open space. The Nevada County General Plan identifies the immediate area as a part of the Penn Valley Village Center with Community Commercial (CC) land uses adjacent to the site. Surrounding General Plan land uses include Urban Medium Density to the southwest and northeast. There are three Penn Valley projects included in **Table 17.0-1** in Section 17.0, Other CEQA Considerations, which is a list of approved and proposed projects in the surrounding area. None of these three projects is on Penn Valley Drive or in the Penn Valley Village Center. Because none of these projects has visual connection to the proposed Penn Valley Dollar General project, they are not included in the cumulative visual setting and analysis.



Source: MPA Architects, Inc., 2016



Not To Scale

FIGURE 4.0-11
Rough and Ready Highway Site Key Viewpoints Location Map

Michael Baker
INTERNATIONAL



*For comparative purposes, site photographs are utilized to demonstrate the general character at different points of the project area. These simulations are subject to change and are intended to provide the reader with information on the form, size, and scale of the proposed improvements within the project area.

Source: MPA Architects, Inc., 2016

FIGURE 4.0-12
Rough and Ready Highway Site Viewpoint A



*For comparative purposes, site photographs are utilized to demonstrate the general character at different points of the project area. These simulations are subject to change and are intended to provide the reader with information on the form, size, and scale of the proposed improvements within the project area.

Source: MPA Architects, Inc., 2016

FIGURE 4.0-13
Rough and Ready Highway Site Viewpoint B



*For comparative purposes, site photographs are utilized to demonstrate the general character at different points of the project area. These simulations are subject to change and are intended to provide the reader with information on the form, size, and scale of the proposed improvements within the project area.

Source: MPA Architects, Inc., 2016

FIGURE 4.0-14
Rough and Ready Highway Site Viewpoint C

Rough and Ready Highway Site: The cumulative setting for the Rough and Ready Highway site is characterized by rural commercial development, single-family residential development, and open space. A large community church is also located approximately one-half mile east of the site, although it is not within the same Sunset neighborhood and cannot be seen from the site. The Nevada County General Plan designates the adjacent lands as Neighborhood Commercial land uses. Surrounding General Plan land uses include Urban High Density, Estate, and Residential. As shown in the list of approved and proposed projects in the surrounding area in **Table 17.0-1** in Section 17.0, Other CEQA Considerations, of the approved and proposed projects known at this time, Yuba River Charter School is the nearest approved project. It is located on the Rough and Ready Highway corridor nearly 1 mile east of the proposed Dollar General project. Between the two projects is a large tract of open space and the Sunset neighborhood. Although the Yuba River Charter School project is on the same public road corridor as the proposed Rough and Ready Highway Dollar General, the distance between the two projects precludes its inclusion in the cumulative visual setting of the proposed Dollar General store.

CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Aesthetic and Lighting Impacts – Alta Sierra

Impact 4.4.1(AS) The Alta Sierra project site is located in a largely developed rural commercial center surrounded by rural residential development and a highway. Cumulative development in the area would substantially alter the existing visual character of the area and generate substantial new light or glare. **(Cumulatively Considerable and Significant and Unavoidable)**

Cumulative development in the vicinity of the Alta Sierra project site, as guided by the Nevada County General Plan, would result in the ongoing conversion of vacant and underutilized properties to more urbanized uses. This ongoing conversion will result in a gradual transition from a rural environment dominated by natural features and scattered development to a more urban environment dominated by development. Future development projects would be subject to the County's development standards and adopted design guidelines, which are intended to protect existing uses, minimize light spillage, and design new development to blend with the character of the surrounding area. Development consistent with these standards and guidelines would ensure cumulative lighting would not result in a significant impact. However, a general conversion from rural to urban uses would result in substantial changes to the visual character of the area that cannot be fully mitigated. Therefore, this would be a **significant** cumulative impact.

As described in Impact 4.1.1(AS) above, development of the Alta Sierra project site would have a significant and unavoidable impact on the visual character and quality of the site and surrounding area. There are no mitigation measures available that could reduce this impacts to a level of insignificance. Therefore, the proposed project's contribution to this cumulative impact would be **cumulatively considerable** and **significant and unavoidable**.

Mitigation Measures

None available.

Cumulative Aesthetic and Lighting Impacts – Penn Valley

Impact 4.4.2(PV) The Penn Valley project site is located in an area developed with similar commercial uses along a developed corridor. Cumulative development would contribute to the ongoing transition of the area to urban uses. Compliance with

4.0 AESTHETICS

existing development standards and applicable design guidelines would reduce cumulative aesthetic and lighting impacts. **(Less than Cumulatively Considerable)**

Development in the vicinity of the Penn Valley project site includes commercial uses consistent with the Nevada County General Plan and the Penn Valley Center Area Plan. Future development in the area would represent a logical expansion of the existing commercial center that serves the surrounding community. Each development project would be subject to the County's development standards and adopted design guidelines, which are intended to protect existing uses, prevent light spillage, and ensure that new development blends with the character of the surrounding area. Therefore, the cumulative impact would be **less than cumulatively considerable** and development of the proposed project would not alter the significance of the overall change.

Mitigation Measures

None required.

Cumulative Aesthetic and Lighting Impacts – Rough and Ready Highway

Impact 4.4.3(RR) The Rough and Ready Highway project site is located in an area dominated by rural residential development and open space. Cumulative development in the area would substantially alter the existing visual character of the area and generate substantial new light or glare. **(Cumulatively Considerable and Significant and Unavoidable)**

Based on existing zoning and General Plan designations, cumulative development in the vicinity of the Rough and Ready Highway project site would result in the conversion of vacant and underutilized properties to residential and commercial uses in the Sunset neighborhood viewshed. A general conversion from the existing rural residential area to a more developed area would result in a change to the existing visual environment that would be subject to the County's development standards and adopted design guidelines, which are intended to protect existing uses, minimize light spillage, and ensure that new development blends with the character of the surrounding area.

As described in Impact 4.3.1 (RR) above, the proposed project is larger in scale and size than other commercial uses in the vicinity. The church which is located 0.5 mile to the east on Rough and Ready Highway is an institutional use, which differs in nature from a commercial use. Due to the size and scale of the Rough and Ready Highway project relative to the existing residential development in the immediate vicinity, and the sensitivity of the site which is based on the high level of viewer exposure from Rough and Ready Highway and West Drive, and concern of residential viewers, the project would have significant and unavoidable impacts on the visual character of the site and surrounding area. The larger scale of the proposed project would in turn contribute to the likelihood of the proposal of additional commercial development that, in order to relate aesthetically and economically to the Dollar General store, would also be out of scale with the existing neighborhood. There are no mitigation measures available that could reduce this impact to less than significant. Because of the project's prominence along Rough and Ready Highway and its scale relative to the surrounding uses, the proposed project's contribution to this cumulative impact would be **cumulatively considerable** and **significant and unavoidable**.

Mitigation Measures

None available.

REFERENCES

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November 21, 2025

To: Steve Geiger, Senior Planner
Nevada County Community Development Agency
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Subject: Response to the Remy Moose Manley, LLP Air Quality and Greenhouse Gas (GHG) Related Comments on the Holiday Market (Penn Valley) Project

Mr. Geiger:

Raney has prepared the following memorandum in response to the comments provided by Remy Moose Manley, LLP regarding the Air Quality and Greenhouse Gas (GHG) Impact Analysis (AQ/GHG Impact Analysis) conducted for the Holiday Market (Penn Valley) Project. The following provides a screenshot of each applicable comment made within the comment letter, and a response to each comment. Raney's responses to each comment are provided in red text.

Comment 3-1:

The air quality modeling includes a number of assumptions that are not explained or supported and there are numerous analytical gaps and inconsistencies. For example, the MND states that 2,306 sq. ft. of building materials and 21,945 cubic yards of soil would be exported from the site during construction. But the MND does not identify where these materials would go or how many truck trips would be required. Standard dump trucks carry 10-16 cubic yards, which means there would be at least 1,372 truck trips just to remove soil from the site. How far would those trips be? Would it go to a landfill or other type of facility? This information is necessary to analyze and understand the Project's air quality and GHG impacts. This information is also necessary to analyze other impacts related to the disposal of waste, including whether there is capacity in the local system. The Utilities and Services Systems section of the MND does not mention construction waste.

Response to Comment 3-1: The hauling trip assumptions are included within Section 5.3.1 of the CalEEMod results report prepared for the proposed project (see Appendix A to the AQ/GHG Impact Analysis). As shown therein, a total of 5.4 one-way hauling trips per day were anticipated to occur during demolition activities, and 68.6 one-way hauling trips per day were anticipated to occur during grading activities associated with the proposed project. CalEEMod assumes a haul truck capacity of 16 cubic yards (CY) per truck, with half of the one-way truck trips assumed to be hauling soil/demolition materials, and the other half of the truck trips assumed to be associated with empty trucks returning to the site. The demolition phase was anticipated to occur over one week (five working days), and the grading phase was anticipated to occur over two months (40 working days), based on project-specific information provided by King Engineering (see Section 5.1 of the CalEEMod results report). Accordingly, the modeling assumed a total of 5,542 hauling trips would occur during the demolition and grading phases associated with project construction.

This material would be exported off-site, but in terms of the actual receiving location, that information is not currently known, nor is it typical in IS/MNDs to have that level of specificity. The model assumes each one-way hauling trip would be 20 miles, which reasonably encompasses likely surrounding destination sources.

The response above is focused specifically on the commenter's concerns related to air quality and GHG emissions. We will defer to the County to provide responses to the non-air quality and GHG related concerns included in the comment (i.e., regarding solid waste capacity and construction waste associated with the Utilities and Service Systems section of the IS/MND).

Comment 3-2

The discussion of construction and operational emissions include almost no analysis or explanation whatsoever, making it virtually impossible for the public or decisionmakers to understand the Project's impacts. Presenting raw numbers and bare conclusions without sufficient explanation does not foster public participation or informed decision-making and does not meet the requirements of CEQA.

Response to Comment 3-2: The Air Quality/GHG Impact Analysis provides a detailed description of the methodology used to estimate construction and operational emissions associated with the proposed project, as well as a description of the air basin in which the project site is located (the Mountain Counties Air Basin [MCAB]), the air district that has jurisdiction over the proposed project (the Northern Sierra Air Quality Management District [NSAQMD]), and the thresholds of significance that have been adopted by the NSAQMD and the proposed project's consistency with such thresholds of significance.

As discussed on pages 7 and 8 of the Air Quality/GHG Impact Analysis, the proposed project's construction emissions would be within the Level A thresholds for ROG and PM₁₀ and the Level B thresholds for NO_x. Pursuant to the NSAQMD guidelines, projects are determined to have a less-than-significant impact if all ROG, NO_x, and PM₁₀ are within Level A or if emissions for only one pollutant are within Level B. Given that the proposed project would result in emissions of ROG and PM₁₀ within Level A, and emissions of NO_x within Level B, and would be required to implement all applicable NSAQMD-recommended measures, the proposed project would result in a less-than-significant level during construction. While the NSAQMD-recommended measures are not required as CEQA mitigation, the Air District requires such measures.

Similarly, as discussed on page 8 of the Air Quality/GHG Impact Analysis, the proposed project's operational emissions would all be within threshold Level A. Given the project's Level A emissions and required compliance with the applicable NSAQMD-recommended measures, the proposed project would result in a less-than-significant impact during operations.

The analysis presented within the Air Quality/GHG Impact Analysis prepared for the proposed project is sufficient in explaining the proposed project's consistency with the NSAQMD-adopted thresholds of significance, and is included within the administrative record available for review by the public.

Comment 3-3

Although the MND notes that there is a State Implementation Plan (SIP) for western Nevada County, it does not explain whether the Project is consistent with the SIP. According to the NSAQMD Guidelines, an SIP takes precedence over the thresholds of significance identified in the Guidelines.

Response to Comment 3-3: An area is designated as “in attainment” when the area is in compliance with the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The NAAQS and CAAQS are set by the USEPA or CARB, respectively, for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or public welfare with a margin of safety.

As discussed on page 5 of the Air Quality/GHG Impact Analysis prepared for the proposed project, because portions of the MCAB have been designated as nonattainment, NSAQMD has prepared a federally enforceable State Implementation Plan (SIP) for western Nevada County in accordance with the Clean Air Act. The SIP is an air quality attainment plan designed to reduce emissions of ozone precursors sufficient to attain the federal ozone AAQS by the earliest practicable date.

As further discussed on page 6 of the Air Quality/GHG Impact Analysis, the NSAQMD has established significance thresholds associated with development projects for emissions of the ozone precursors ROG and NO_x, as well as for PM₁₀. Adopted NSAQMD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated nonattainment.

Generally, if a project’s emissions would not exceed the NSAQMD thresholds of significance for ozone precursors (ROG and NO_x) and PM₁₀, that project would not be considered to conflict or obstruct implementation of the SIP. As discussed on pages 7 and 8 of the Air Quality/GHG Impact Analysis, as well as detailed in Response to Comment 3-2 above, the proposed project’s construction and operational emissions would not exceed the NSAQMD thresholds of significance for ozone precursors (ROG and NO_x) and PM₁₀. Thus, the proposed project would not be considered to conflict with or obstruct implementation of the SIP.

Comment 3-4

The MND states that the air quality modeling included adjustments consistent with project-specific trip rate data provided by GHS for the proposed project but does not identify what those adjustments were (there is a footnote “1” indicated on page 31, but there is no footnote). Assuming the data is based on the Traffic Memo, the data is fundamentally flawed and severely undercounts trips and other relevant data points as explained below in the Transportation section. It is also unclear whether the air quality analysis includes the increased emissions caused by the degraded level of service that will occur at several intersections and roadways. This analysis must be redone with realistic trip counts and traffic assumptions to be able to assess the Project’s air quality impacts.

Response to Comment 3-4: The commenter is correct that the vehicle trips were adjusted in the CalEEMod modeling prepared for the proposed project consistent with project-specific trip rate data provided by GHD. As discussed in the AQ/GHG Impact Analysis, the proposed project would replace the existing Holiday Market currently located north of the project site at the Wildwood Center. Because the existing Holiday Market at the Wildwood Center is currently generating vehicle trips, the net new increase in vehicle trips was calculated by GHD, and the trip rates applied within the model represent net trips associated with the proposed project. As presented in Table 15 of the Traffic Impact Analysis Memorandum prepared by GHD, the proposed project was estimated to generate a total of 1,044 net new daily trips. The daily trip assumptions applied to the project modeling are included within Section 5.9.1 of the CalEEMod results report (see Appendix A to the AQ/GHG Impact Analysis). As presented therein, 1,044 total daily trips were assumed in the CalEEMod report, consistent with the net increase in daily vehicle trips calculated by GHD.

Additionally, with regard to emissions associated with intersections, the AQ/GHG Impact Analysis prepared for the proposed project included an analysis of localized CO emissions. As discussed therein, although NSAQMD does not have an established threshold for CO, the nearby air district, Placer County Air Pollution Control District (PCAPCD), who has authority over a portion of the MCAB, has a screening level for localized CO impacts. According to the PCAPCD screening levels, a project could result in a significant impact if the project would result in CO emissions from vehicle operations in excess of 550 lbs/day. As shown in Table 5 of the AQ/GHG Impact Analysis, CO emissions associated with the proposed project would be well below the PCAPCD's 550 lbs/day screening level. Therefore, based on the nearby PCAPCD's screening levels for localized CO impacts, the proposed project would not be considered to expose sensitive receptors to substantial concentrations of localized CO.

Comment 3-5

The analysis also assumes that there would be no cumulative significant impacts because the Project-specific impacts would be less than significant. That is not how CEQA works. In fact, CEQA requires cumulative impacts analyses specifically for this purpose, so it can be determined whether a project in combination with other projects would result in a significant impact even though the impacts of the individual project may be less than significant.

Response to Comment 3-5: As discussed on page 9 of the Air Quality/GHG Impact Analysis prepared for the proposed project, due to the dispersive nature and regional sourcing of air pollutants, air pollution is already largely a cumulative impact. The nonattainment status of regional pollutants, including ozone and PM, is a result of past and present development, and, thus, cumulative impacts related to these pollutants could be considered cumulatively significant.

To improve air quality and attain the health-based standards, reductions in emissions are necessary within nonattainment areas. Adopted NSAQMD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated nonattainment, consistent with applicable air quality plans. As future attainment of AAQS is a function of successful implementation of NSAQMD's planning efforts, by exceeding NSAQMD's Level C thresholds or Level B thresholds for two or more pollutants for construction or operational emissions, a project could contribute to the region's nonattainment status for ozone and PM emissions and could be considered to conflict with or obstruct implementation of the NSAQMD's air quality planning efforts.

In other words, the NSAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable during development of their thresholds of significance for air pollutants. Thus, if a project exceeds the identified significance thresholds, the project's emissions would be considered cumulatively considerable, resulting in a significant adverse incremental contribution to the region's existing air quality conditions.

As discussed on pages 7 and 8 of the Air Quality/GHG Impact Analysis, as well as detailed in Response to Comment 3-2 above, the proposed project's construction and operational emissions would not exceed the NSAQMD thresholds of significance for ozone precursors (ROG and NO_x) and PM₁₀. Thus, the proposed project would not be considered to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment, and the project's incremental contribution to cumulative emissions would be considered less than significant.

Comment 3-6

Finally, the analysis of GHG impacts is severely flawed. Although the MND expressly acknowledges that "the primary source of GHG emissions for the project would be mobile source emissions," the analysis does not quantify those emissions and excludes them entirely from the impact assessment. As explained below in the Transportation section, the assumption that the Project will result in a reduction in VMT is unsupported and erroneous. The analysis must also consider delivery trucks and other mobile source emissions in addition to passenger vehicles. According to the MND, the project would require seven medium and seven heavy trucks on Fridays alone, not including deliveries on other days of the week. Adding what the MND itself describes as the Project's "primary source" of GHG emissions to the other sources of emissions identified in the MND will very likely cause the Project to exceed the threshold of significance. The County should also explain why the identified threshold of significance is appropriate for this Project.

Response to Comment 3-6: As stated on page 15 of the AQ/GHG Impact Analysis, the proposed project is located within the jurisdictional boundaries of the NSAQMD, which does not currently have any established thresholds for GHG emissions. While NSAQMD prefers that GHG emissions are generally quantified for decision-makers and the public to consider, the NSAQMD typically excludes regulation of mobile source emissions, as such emissions are regulated by CARB on a State-wide basis.¹ In addition, a direct correlation exists between VMT and mobile source GHG emissions. Thus, according to the NSAQMD, a reasonable assumption can be made that if the proposed project is determined to meet the LCI's screening criteria for local-serving retail uses, the proposed project's mobile source GHG emissions can also be screened out of further analysis.²

¹ Julie Hunter, Air Pollution Control Officer/Executive Director, Northern Sierra Air Quality Management District. Personal Communication [email] with Rod Stinson, Vice President, Raney Planning and Management. February 6, 2025.

² *Ibid.*

The reasoning within the GHG analysis regarding the proposed project being a local-serving use is consistent with the VMT analysis prepared for the proposed project by GHD. Please see the responses to the commenter's concerns regarding the Traffic Impact Analysis Memorandum prepared by GHD for further detail related to the VMT analysis prepared for the proposed project.

Finally, with regard to the use of the PCAPCD's GHG thresholds, as discussed on page 16 of the AQ/GHG Impact Analysis, because the NSAQMD has not adopted GHG thresholds, the thresholds of PCAPCD were applied to the proposed project. The thresholds of significance were adopted by the PCAPCD to aid in compliance with the statewide goals established by AB 32 and SB 32, and the NSAQMD has determined that the thresholds are appropriate for the proposed project.³

If you have any questions regarding the contents of this document, please do not hesitate to contact me at (916) 372-6100, or via email at rods@raneymanagement.com.

Best Regards,

Rod Stinson
Vice President/Air Quality Specialist



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³ Julie Hunter, Air Pollution Control Officer/Executive Director, Northern Sierra Air Quality Management District. Personal Communication [email] with Rod Stinson, Vice President, Raney Planning and Management. February 6, 2025.



COUNTY OF NEVADA
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Engineering
Fleet Services
Road Maintenance
Solid Waste
Surveying
Transit Services
Wastewater

DATE: November 21, 2025 **FILE: PLN24-0089**

TO: Steve Geiger, Senior Planner

FROM: Kidd Immel, Senior Civil Engineer

PROJECT: North State Grocery, Inc. – Holiday Market
18805 Pine Shadows Lane, Penn Valley, CA 95946, APN 051-240-014

SUBJECT: Response to §4. Transportation and §5. Utilities and Service Systems, of the letter from Christopher Stiles, RMM, LLP, dated 11-17-2025

The comment letter raises concerns regarding the traffic analysis, the use of 2022 baseline data, the application of CEQA, the TIAG requirements, VMT screening, weekend traffic, trip generation, modeling methods, site-circulation review, safety review, and sewer analysis.

As explained below, the comments misstate CEQA requirements, misread the County’s TIAG, and do not provide evidence that the analysis is faulty or that an EIR is required.

Level of Service Policies

The project does not cause any crossing or road stretch to drop from an acceptable to an unacceptable Level of Service under the General Plan rules. The comment’s assertion is unsupported.

Vehicle Miles Traveled (VMT) Screening

The commenter misstates CEQA. Under SB 743, VMT—not LOS—is the CEQA transportation impact threshold. The project qualifies for VMT screening because:

- It relocates an existing grocery store with the same draw area
- It is a local-serving commercial use under OPR/LCI guidance
- No regional trip lengthening occurs
- Ancillary uses were already included in trip generation

The comment argues that relocation increases VMT but presents no evidence. The project therefore meets CEQA VMT screening and does not require a full VMT analysis.

Use of 2022 Traffic Counts

CEQA requires that baseline conditions reflect the environment at the time of the environmental review, unless substantial evidence supports another approach. The 2022 counts were current at

the time the TIA was prepared (October 2022) and fully met TIAG requirements. CEQA does not require that technical studies and the later-prepared MND share identical completion dates. CEQA documents regularly rely on studies completed months or years prior, provided no evidence shows conditions have substantially changed.

Although not required, new 2025 traffic counts were collected on October 21, 2025. Those counts confirmed the 2022 data and showed:

- Pleasant Valley Road ADT decreased
- Pleasant Valley Road/Lake Wildwood Gate #1 volumes decreased
- Pleasant Valley Road/SR 20 volumes increased slightly, with no LOS changes

No evidence supports the comment's claim that "traffic has increased substantially" or that pandemic recovery undermines the 2022 data. The updated 2025 counts demonstrate that the original baseline remains valid.

TIAG requires data to be within two years of the traffic study, not within two years of CEQA document circulation. This is longstanding professional practice and is the only logical reading given multi-year CEQA review timelines.

TIAG also calls for updated counts only when conditions have changed. The 2025 counts show they have not.

When Counts Should Be Taken

The 2022 counts were taken Tuesday, August 30, 2022—a normal school day. The TIAG does not prohibit counts outside the September–May example period; that range is intended to ensure school traffic is captured. The 2025 counts also validate that the 2022 data reflect normal conditions.

TIAG allows single-day counts unless there is evidence that the day was atypical. The commenter provides none. Weekend counts are not required for standard retail projects, and TIAG does not require "worst-case" analyses for ordinary commercial uses.

Weekend Traffic, Special Events, and Second-Home Travel

The commenter says that weekend traffic or "second-home visitor" patterns must be weighed. The TIAG does not call for weekend counts for a standard retail project. This project is not treated as a special-event draw, and the guidelines do not call for worst-case guesswork.

Ancillary Uses

The comment asserts that a Starbucks materially alters trip generation. This is incorrect. The TIA incorporated all in-store services, including the coffee service area, using ITE trip rates as required by TIAG. ITE rates inherently include ancillary services in grocery stores. Using Holiday Market-specific counts would have resulted in lower trip rates; the analysis is therefore conservative.

Manuals

The comment claims the TIA should have used the 7th Edition HCM (released 2002) and the 12th Edition ITE Manual (released 2025).

TIAG does not require retroactively updating analyses every time a manual is revised. Doing so is not industry practice and would make long CEQA reviews unworkable.

The TIA complied with TIAG by using the then-current HCM and ITE editions.

Under-Stated Impacts

The comment asserts that golf-cart trips at the current site will “turn into vehicle trips” and were not accounted for.

The 2025 counts include all travel modes present and confirm that golf-cart volumes are extremely low and have negligible effect on LOS.

Subtracting existing trips based on square footage complies with TIAG and ITE methods; nothing in CEQA requires alternative custom trip-generation models without evidence that they are warranted.

On-Site Circulation and Truck Access

The comment claims truck circulation was not analyzed.

Section 9.1 of the TIA evaluates truck circulation and demonstrates compliance with TIAG. Site access, driveway spacing, turning movements, internal layout, and pedestrian facilities were reviewed consistent with TIAG.

Safety, Emergency Access, ADA, and Evacuation

The comment mischaracterizes the safety review. Emergency access was reviewed by the appropriate agencies and found adequate.

The project uses two access points, meeting fire-service requirements. TIA safety findings are supported by analysis and appropriate mitigation measures. Nothing in the record indicates the project increases evacuation risk.

The IS-MND separately evaluates noise and air-quality impacts. CEQA does not require duplicative analysis in the TIA.

Emergency Response Times and Evacuation

Emergency access was reviewed by the relevant agencies and found adequate. The project does not alter evacuation routes, and no evidence indicates the project would impair emergency response.

Construction Impacts

The MND rightly treats building-stage traffic effects as short-lived and not as lasting changes to travel. The work is a plain, standard build, and any needed permits will call for traffic control plans. No odd or out-of-the-way conditions are foreseen during construction. Even so, the IS-MND does weigh short-term building traffic and lists steps to soften those impacts.

Mitigation Measures

Mitigation measures were incorporated into the analysis where applicable. CEQA does not require speculative modeling of hypothetical conditions after mitigation unless mitigation may itself cause new impacts—which is not the case here

Utilities and Service Systems

The comment asserts the IS-MND defers analysis of sewer capacity.

This is incorrect. As stated in MND Impact 19(a), the Lake Wildwood wastewater treatment system has adequate capacity to serve the project. No element was segmented or deferred. The Banning Ranch case is not applicable.

Your ref: 12654566_Proposal_Oct2024_PVHolidayMarket.docx (Attachment A)
Our ref: 12654566

25 November 2025

Mr. Steve Geiger, Senior Planner
Nevada County Community Development Agency
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Transportation Response Effort to Remy Moose Manley LLP Comments on the Proposed Penn Valley Holiday Market Project

Hi Steve,

GHD has prepared the following letter in response to the transportation comments provided by Remy, Moose, Manley, LLP on the North State Grocery, Inc., -- Holiday Market (Penn Valley) Project Draft Initial Study/Negative Declaration (11-17-2025). As with other responders, the following provides a screenshot of each transportation comment within their letter (Section 4. Transportation) and a response to each comment. GHD's response to each comment is in red text.

Comment 4.1:

First, the data used for the traffic analysis is outdated and does not meet the requirements of the County's TIAG or CEQA. The Traffic Memo identifies Year 2022 as "existing conditions," and uses 2022 conditions as the point of comparison to identify Project impacts. In CEQA terms, this is called the "baseline." Under CEQA, when an agency prepares an MND, the baseline must reflect conditions that exist at the time the MND is prepared. Since the County is required to prepare an EIR, for all the reasons explained in this letter, the baseline must reflect conditions that exist when the County issues the Notice of Preparation (NOP), which has not yet occurred. Thus, using 2022 as the baseline would not meet CEQA's requirements in any scenario. The other points of comparison (i.e., Year 2024 as future "near term" conditions and Cumulative Year 2042 conditions) are similarly off base and unhelpful for analyzing the Project's impacts under CEQA or the TIAG.

Response to Comment 4.1: "Based on comments received at the Lake Wildwood HOA Town Hall meeting (October, 2025) to discuss/introduce the proposed Penn Valley Holiday Market project; concerns were raised about the date of the volume data used in the traffic impact analysis (TIA). Specifically, volume data collection was done for the project analysis in August 2022. Since approximately three years have elapsed due to ongoing project review for the proposed project between Nevada County/Caltrans, the concern was that previous traffic counts did not reflect current traffic conditions and changing commute patterns. As a result of these concerns, new AM peak period (7:00-9:00 a.m.) and PM peak period (4:00-6:00 p.m.) intersection turning movement counts were conducted at all five project study intersections on Pleasant Valley Road. Peak period traffic counts were conducted on Tuesday October 21, 2025. Schools were in session and (based on hybrid work schedules), reflected a typical commute period for employees traveling to/from work. (RTO policies typically require employees to commute on Tuesdays, Wednesdays, and Thursdays). The results of the new traffic data collection are shown in the 2025-2022 Volume Comparison Table (attached). As analyzed, the new

2025 intersection volumes are lower than 2022 traffic volumes at every project study intersection with one exception; Pleasant Valley Road/Highway 20. At this location, PM peak hour traffic volumes were 6.9% higher than previous 2022 volumes. Intersection operations (Level-of-Service) were re-calculated for Existing (No Project) and Existing plus Project conditions (attached). As a result of increased volumes, intersection operations at the PVR/Highway 20 intersection would remain unchanged from previous 2022 levels with increases of 1.4 – 1.5 seconds of delay in overall intersection LOS. During the AM peak hour for Existing (No Project) Conditions, intersection LOS would remain unchanged (LOS C 21.9 seconds of delay to LOS C 23.3 seconds of delay). During the PM peak hour for Existing plus Project, intersection LOS would remain unchanged (LOS C 22.1 seconds of delay to LOS C 23.6 seconds of delay). No other project study intersection experienced increases in overall AM or PM peak hour volumes. Future development scenarios (Year 2024 and Year 2042) would still be consistent with near-term and future horizon analyses.

Comment 4.2:

In addition, according to the TIAG, traffic counts cannot be more than two years old. Here, the traffic counts are much older than two years. Even if the County claims the TIAG only requires traffic data to be collected within two years of the traffic study completion and not the CEQA analysis, which is illogical, the TIAG also requires updated analysis if the existing analysis is more than two years old and conditions have changed and/or the proposed project has changed. Here, traffic in the study area has increased substantially since 2022 as the County continues to recover from the Covid pandemic when traffic levels were depressed. Moreover, traffic is normally heavier on Fridays and Weekends when the owners of second homes and relatives of full-time residents come to visit. By the Holiday Market’s own admission, car traffic is heavier on weekends. There has also been a significant difference in the type of school traffic travelling on Pleasant Valley Road compared to 2022. Further, it does not appear that the Traffic Memo contemplated a Starbucks, which alone will fundamentally change the analysis, including more trips and more VMT as just two examples, and will affect both the traffic and air quality/GHG analysis.

Response to Comment 4.2: Nevada County staff has clarified their policy on the age of traffic volume data as it relates to transportation analyses. The policy referred to the preference of collecting data for County use within a two-year window for public works/engineering review purposes. However, when it comes to reviewing traffic volume data for a CEQA analysis, the requirement is to ensure that the volume data used in the analysis is turned into the County for review within a two-year period. Data collection for the proposed project was collected in August 2022 and the draft Traffic Impact Analysis Memorandum (TIAM) for the project was initially submitted to the County in October 2022. This time period has been deemed acceptable by County staff. Recent 2025 traffic counts at the five project study intersections indicate peak hour volumes have decreased or remain unchanged from 2022 levels (please see Response 4.1). Traffic data collection is typically conducted on a weekday Tuesday, Wednesday, or Thursday during the peak AM and PM commute periods (the peak hour of adjacent street traffic). This is intentional in that “typical” volume commute patterns are consistent on these three weekdays. If vehicle counts were conducted on Mondays or Fridays, it would not be consistent to count as these are “a-typical” commute days and can skew traffic volumes higher or lower depending on RTO patterns, getaway days, or work from home days. In addition, Nevada County requirements state the following:

“Peak Hour traffic counts shall be conducted between 7:00am to 9:00 am and 4:00 pm to 6:00 pm on a Tuesday, Wednesday, or Thursday during the normal public school period (i.e., September to May). The County will provide copies of existing traffic count information, if available.”

For the purpose of this traffic analysis, vehicle counts were conducted in very late August during school sessions to account for specific school traffic patterns. These volumes were confirmed by recent traffic volume counts conducted in October 2025 (attached) in that traffic flow patterns stayed relatively unchanged from previous levels or less than previous volume levels.

The Starbucks coffee bar would be internal to the proposed Holiday Market grocery store, not a stand-alone

retail store and/or drive-through store. This type of coffee store is would not require additional trip generation since these uses are included in the ITE trip generation category utilized in this study. The Supermarket land use for this study is described in the following manor (ITE Land Use #850): “A supermarket is a free-standing retail store that sells a complete assortment of food, beverages, food preparation materials, and household products. A supermarket may also provide additional products and services such as a bakery, dry cleaning, floral arrangements, greeting cards, a limited-service bank, and a pharmacy.” Internal coffee bars are contained within these uses. In conclusion, the proposed project will reduce overall network VMT by reducing shopping trips to Marysville, Penn Valley, and Grass Valley for significant grocery purchases.

Comment 4.3.

It also appears that the Traffic Memo used outdated methodology and modeling tools. For example, the Traffic Memo cites the Highway Capacity Manual (HCM) 6th Edition (2016), but it should have followed the methodology in the most recent version of the HCM (a 7th Edition), which was released in 2022. The Traffic Memo also calculates daily and peak hour project trip generation using the Institute of Transportation Engineers (ITE) Publication Trip Generation Manual (11th Edition), while a new edition (12th Edition) was published in August 2025. The analysis must be redone using up-to-date methodology.

Response to Comment 4.3: Nevada County’s most up-to-date TIAG indicates the following: “Analysis Methodologies - Highway Capacity Manual (HCM) 6th Edition (2016) methodology shall be used. The consultant shall utilize the current *Synchro* software suite when analyzing intersections and roadway segments. LOS outputs, however, will be based on HCM 6th Edition (2016) (and not generated through *Synchro* 8).” In addition, the most current edition at the time of this traffic analysis was used to determine project trip generation (Institute of Transportation (ITE), Trip Generation, 11th Edition, was used for proposed project analysis released in 2021. The proposed project TIAM was well into County review by the time the most recent 2025 trip generation manual was published (less than 3 months ago).

Comment 4.4

The Traffic Memo and MND also rely on insufficient data. For example, the Traffic Memo relies on data (e.g., traffic counts) collected on a single Tuesday in August 2022 during the AM peak and PM peak periods. According to the County’s TIAG: “In general, the peak hour trip generation shall be that of a typical weekday and shall coincide with the peak hour of the roadway system (not the peak hour of the generator); however, there may be instances where a unique project use requires an analysis during different time frames.” The TIAG further specifies that Peak Hour traffic counts shall be conducted between 7:00am to 9:00 am and 4:00 pm to 6:00 pm on a Tuesday, Wednesday, or Thursday during the normal public-school period (i.e. September to May). Although Tuesday is one of the days identified in the TIAG, the chosen date was not within the permissible September-to-May window. Even more important, however, is that the TIAG acknowledges that a single-day traffic count, even on the specified days, is not always appropriate particularly if traffic that day does not reflect typical conditions. As already noted, the traffic counts do not reflect typical conditions and, as a result, the analysis underestimates traffic impacts. For this type of project in this area, the analysis must also consider weekend traffic. And the County should also require a worst-case analysis so that the decision-makers and the public can understand the real severity of the traffic impacts that will result from the Project.

Response to Comment 4.4: School calendars have changed over the years and typically reflect an earlier starting period in the mid-late August period. This is true of local school districts in the project study area. For

example, both the Gass Valley and Penn Valley School Districts first day of class starts on August 13th. Please also refer to response # 4.1

Comment 4.5

Although the discussion of traffic modeling is far from transparent, there are some obvious flaws regarding the modeling inputs and trip generation assumptions. For example, the modeling does not accurately reflect the fact that many trips to the current location are via golf cart or other non-auto modes that will turn into vehicle trips for the new location. The Traffic Memo appears to subtract trips from the existing store from the trip generation calculations for the new location, but that appears to be based on square footage (e.g., subtracting the trips generated by 12,870 square feet of supermarket use [current location] from the trips generated by 30,268 square feet of supermarket use [new location]). The methodology fails to reflect the unique facts that exist for this Project and must be redone to account for the project-specific circumstances.

Response to Comment 4.5: Existing traffic counts conducted at the PVR/Lake Wildwood Drive intersection reflect all auto and non-auto vehicle trips. Golf carts were observed travelling through the intersection and were counted as a vehicle trip. In addition, both pedestrian and bicycle counts were conducted. In addition, vehicle traffic from the existing store (Wildwood Shopping Center) is currently travelling on the existing street network along Pleasant Valley Road and are contained in existing traffic count data. For this reason, vehicle traffic generated by the existing Holiday Market store had to be subtracted (or discounted) from the proposed new Holiday Market trip generation so as not to “double-count” the net new increase in proposed project vehicle trips. However (as noted in the TIAM), all net-new and pass-by project trip generation was analyzed at the primary project access streets of Pine Shadows Lane and Commercial Avenue.

Comment 4.6:

According to the County’s TIAG, traffic studies must include a discussion of any unusual circumstances anticipated during construction. Proposed transportation facility closures, construction signage, haul routes, impacts to public facilities, safety features, and detours must also be included in the analysis. Here, the Traffic Memo and the MND fail to adequately address construction-related impacts.

Response to Comment 4.6: Nevada County can address this construction issue more clearly, but the County will require the development of temporary construction plans and how pedestrian/bike travel would be handled during project construction. These plans are typically provided (should the project be approved), but prior to issuing a construction permit.

Comment 4.7:

The Traffic Memo’s discussion of site access and on-site circulation does not address all of the specific items identified in the County’s TIAG. Specifically, the TIAG requires that the discussion of on-site circulation include “descriptions of the proposed access points, turn prohibitions, number of lanes proposed, on-site transit stop locations, driveway throat depth, parking supply/demand/parking aisle circulation, on-site pedestrian circulation, bicycle parking, on/off-site delivery truck circulation and any other applicable circulation issues.” While the Traffic Memo discusses some of these topics, it is very general. Notably, the Traffic Memo does not specifically discuss delivery truck circulation.

Response to Comment 4.7: The TIAM performed for the proposed project has a significant section on Site Access and Design Parameters (Section 12.1-12.3). However, the TIAM does not provide a more detailed truck

circulation discussion and as such provides the following: Large truck deliveries will access the project site via the PVR/Commercial Avenue intersection (inbound) travelling north on the Commercial Avenue extension. Upon reaching the main building, trucks will turn east and circulate around the rear of the building to the loading docks. Trucks will be able to back into (reverse) into the loading dock without disrupting overall travel lanes. Once off-loaded, trucks will then travel east around a large-radius internal drive specifically designed for large trucks before extending south and west back to the Commercial Avenue extension. Trucks will then exit back out southwest on Commercial Avenue to Pleasant Valley Road. Due to the proximity of Commercial Avenue to Highway 20, large trucks will be limited to off-peak hours (very early morning or late night) to avoid truck-vehicle congestion merging onto Pleasant Valley Road (southbound).

Comment 4.8:

Under the County's TIAG, traffic studies must also include a discussion of potential safety impacts. The TIAG specifies that the discussion should include fire safety and emergency access, and compliance with the Americans with Disabilities Act (ADA), and "may also include an analysis of residential neighborhoods impacts, discussion on potential noise and air quality impacts, etc." Here, the discussion of safety impacts in the Traffic Study is cursory and not well supported. For example, Section 13 (Summary, Mitigation, and Recommendations) states the identified mitigation will improve safety, but the discussion is conclusory.

Response to Comment 4.8: Fire and emergency first responders will be able to access the proposed project site from two (2) primary streets (Commercial Avenue and Pine Shadows Lane). Pine Shadows Lane will provide access to the front parking areas and main building. Commercial Avenue will provide access to both the front and rear building and main parking areas. The TIAM clearly indicates that (should the proposed project be approved), overall vehicle-conflict safety will be improved at the PVR/Commercial Avenue intersection. Both new project trips (and existing patrons using Commercial Avenue businesses) will be attracted to use the Pine Shadows Lane rather than Commercial Avenue for outbound turning movements onto Pleasant Valley Road. The PVR/Pine Shadows Lane intersection provides for greater vehicle sight distance, is less proximate to Highway 20, and will operate at LOS C or better with proposed project traffic.

Comment 4.9:

As another example, Section 13.4 (On-Site Circulation) identifies only one potential safety impact that would be caused by the northerly extension of Commercial Drive to Pine Shadows Lane, which would divide the Holiday Market's main parking field from the supermarket building. Although Section 13.1 identifies mitigation for this impact, the Traffic Memo does not explain why the mitigation would be effective or why other safety impacts would not occur.

Response to Comment 4.9: The TIAM discusses the need for both pedestrian/safety and traffic calming improvements along the project frontage and elsewhere in the study area. Specific improvements are initially discussed in Section 12.3 (Pedestrian & Bicycle Access). However, the TIAM also discusses the need for additional circulation improvements beyond intersection recommendations, and these are discussed as follows: "In addition to recommended intersection improvements, the following circulation improvements are also recommended to improve pedestrian and bicycle safety and reduce pedestrian/vehicle conflicts along Commercial Drive and Pine Shadows Lane in and around the proposed project site:

- Install all-way-stop-control at the Commercial Drive/Shared Access Road (Industrial access road) intersection located south of the primary supermarket building;
- Install raised speed table/crosswalk(s) on the Commercial Drive northern extension between the Holiday Market building and main parking field.
- Install stop-sign control for northbound turning movements at Commercial Drive at Pine Shadows Lane

intersection.

- With proposed project development, pedestrian sidewalks should be installed along key project frontages (west, north, and south sides of building) and along the south side of Pine Shadows Lane. Pedestrian connections should be provided between the parking field and main building connecting to the recommended raised speed table/pedestrian crosswalks. Bicycle racks should be provided along the main building frontage for bicycle parking.

The mitigation recommended above would be effective by slowing traffic flows down in front of the proposed Holiday Market front store frontage where pedestrians walking between the storefront and parking areas will mix with north-south traffic between the northerly Commercial Avenue extension and Pine Shadows Lane. Recommendations have also been recommended for the northerly extension of Commercial Avenue to include full pedestrian sidewalk connections to the project. The extension of the pedestrian sidewalk on Commercial Avenue will help to link pedestrian access from the PVR/Highway 20 intersection (Caltrans project) to Commercial Avenue.

Comment 4.10:

The discussion of emergency access is a single sentence: “Emergency access is adequately provided through the project access driveways from Pine Shadows Lane and the northerly extension of Commercial Avenue.” The Traffic Memo does not explain why the access is “adequate” or how emergency access issues would be handled on-site.

Response to Comment 4.10: As noted, fire and emergency access to the site would be gained by two project access streets (Pine Shadows Lane and northerly extension of Commercial Avenue). The roadways will provide two means of access to/from the project site (as opposed to only one access route). The two roadways will be non-gated and allow an alternative access should one route become impassible. Emergency responders will typically just pull in front of the main storefront building to access emergencies with the building or would use the primary internal drive along the south side of the building to access emergencies in the rear of the building or parking area.

Comment 4.11:

The Traffic Memo also does not discuss the project’s impact on fire safety, evacuation routes/plans, compliance with the ADA, residential neighborhood impacts, or potential noise and air quality impacts that could result from increased traffic, including construction equipment and delivery trucks.

Response to Comment 4.11: Nevada County will provide information related to their emergency evacuation plan (EEP) and current roadway infrastructure in relation to proposed project development. Please see Response to Comment 4.7.

Comment 4.12:

According to the County’s TIAG, “if the project traffic causes an intersection or roadway segment to worsen from an acceptable LOS to an unacceptable LOS or is distributed to an intersection or roadway segment currently operating at an unacceptable LOS, the project impacts must be mitigated to an acceptable LOS to remain consistent with Nevada County General Plan Circulation Element Policies LU-4.1.1 and 4.1.2.” Since the Project will cause or at least contribute to worsening LOS to an unacceptable level at certain intersections and roadways segments under certain scenarios, and will not be mitigated to an acceptable LOS, the Project is not consistent with the County’s Circulation Element.

Response to Comment 4.12. All five project study intersections along Penn Valley Road were evaluated for Existing (No Project) and Existing plus Project operating conditions. When peak hour project trips were added to Existing traffic conditions; if any of the five intersections dropped below LOS D (acceptable) to LOS E-F (unacceptable), mitigation was recommended to improve operating conditions back to LOS D or better. The proposed project is required to mitigate all unacceptable conditions under Existing plus Project conditions if an intersection falls below the County's threshold of LOS D. Under either Near-Term (No Project) or Cumulative (No Project) conditions, should the proposed project contribute to unacceptable conditions (LOS E-F) or cause an intersection to fall below LOS D; then Nevada County will assess local traffic mitigation fees (LTMF) on the proposed project to help improve operating conditions at their discretion. Since poor conditions are already being caused by either Near-Term or Cumulative traffic volumes without the proposed project, the individual project cannot be held solely responsible for improving unacceptable conditions under future horizon build scenarios.

Comment 4.13:

As noted in the MND and the Traffic Memo, CEQA is focused primarily, although not exclusively, on VMT-related impacts. The MND and the Traffic Memo, however, improperly omit any discussion of the Project's VMT impacts. The Traffic Memo concludes that, based on technical guidance from the Office of Planning and Research (OPR), now the Governor's Office of Land Use and Climate Innovation (LCI), "the project would likely be screened out," meaning further VMT analysis would not be required. The cited guidance indicates that "local serving" retail development, as opposed to "regional serving" retail development, tends to shorten trips and reduce VMT by adding opportunities into the urban fabric and improving retail destination proximity, and therefore, lead agencies generally may presume such development creates a less-than-significant transportation impact. The County's analysis stops there. But the guidance also states that lead agencies should also consider "any project-specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior." And the County's own TIAG acknowledges that projects that meet the screening criteria still might not be screened out if there are unique project factors that may create VMT.

Here, the County improperly relies on screening criteria to ignore the Project's VMT impacts. For example, the County is not adding a new retail opportunity for local residents but instead is moving an existing retail opportunity to a different location, resulting in new trips and further travel distances for customers. Notably, the courts have recently been critical of agencies for relying on OPR's guidance without accounting for project- or location-specific information. (See *Cleveland National Forest Foundation v. County of San Diego* (2025) 110 Cal.App.5th 948 [rejecting use of OPR's recommended VMT thresholds without considering local conditions].) The analysis also ignores VMT related to the proposed Starbucks, which will generate additional trips and VMT unique from shoppers at the grocery store. The Project's VMT impacts must be properly quantified and adequately analyzed in an EIR.

Response to Comment 4.13: Nevada County Community Development and Public Works staff have reviewed the VMT analysis performed for the proposed project and found it to be acceptable. The proposed project is "local serving" and is not a regional serving business. The applicant indicates that it will serve the Lake Wildwood and the Penn Valley areas (not Grass Valley and not Marysville). The size of the proposed project is not consistent with larger grocery stores (Safeway, Raley's, Walmart, Target) that can have a more regional presence. In addition, residents of Lake Wildwood and Penn Valley that currently patronize grocery stores in Grass Valley when grocery shopping needs arise beyond those satisfied by the existing Holiday Market will now have opportunities to shop at the new store. In this regard, the location of the proposed project

would help to reduce overall VMT and keep more vehicle shopping trips local than today. As noted in response 4.2, the Starbucks coffee bar would be internal to the proposed Holiday Market grocery store, not a stand-alone retail store and/or drive-through store. This type of coffee store is would not require additional trip generation since these uses are included in the ITE trip generation category utilized in this study. The Supermarket land use for this study is described in the following manor (ITE Land Use #850): "A supermarket is a free-standing retail store that sells a complete assortment of food, beverages, food preparation materials, and household products. A supermarket may also provide additional products and services such as a bakery, dry cleaning, floral arrangements, greeting cards, a limited-service bank, and a pharmacy." Internal coffee bars are contained within these uses. In conclusion, the proposed project will reduce overall network VMT by reducing shopping trips to Marysville, Penn Valley, and Grass Valley for significant grocery purchases.

Comment 4:14:

The MND also fails to address how the increased traffic will affect emergency response times and evacuation routes.

Response to Comment 4.14: The two-way-left-turn-lane on Pleasant Valley Road between Commercial Avenue and Lake Wildwood Drive allows emergency vehicles to by-pass north-south traffic volumes on the roadway. In addition, emergency vehicle pre-emption at signalized locations can allow for quicker passage through the study area at Highway 20.

Please contact me if you have any questions related to these transportation responses to the RMM LLP comment letter.

Regards



Peter Galloway
Senior Transportation Planner



Byung Lee, PE, TE
Senior Project Manager

Copy to: Mr. Richie Morgan, President Ameritus, NSG
Trisha Tillotson, Community Development Director, Nevada County Community Development Director

Attachments: 2025/2022 Count Summary Table, Synchro Intersection LOS: Highway 20/PVR

Existing Traffic Counts (2025 vs. 2022)

Penn Valley Holiday Market Project

AM Peak Hour																				
#	Date	Peak Hour Change	Intersection	SBL	SBT	SBR	WBL	WBT	WBR	NBL	NBT	NBR	EBL	EBT	EBR	Total (2022)	Total (2025)	Difference	3-Year Growth	
1	2025 - 2022	15min Later	Pleasant Valley Road & Lake Wildwood Dr.	-28	-100	-14	-60	2	-19	-11	-20	-4	-11	-5	-10	1049	769	-280	-26.7%	
2	2025 - 2022	15min Later	Pleasant Valley Road & Pine Shadows Lane	0	-125	0	0	0	1	0	-58	-1	0	0	0	878	695	-183	-20.8%	
3	2025 - 2022	15min Later	Pleasant Valley Road & Commercial Ave.	-20	-120	-1	-1	1	4	-3	-65	9	0	0	-7	1001	798	-203	-20.3%	
4	2025 - 2022	15min Earlier	Pleasant Valley Road & Highway 20 (SR 20)	-18	-85	0	-3	32	-7	-5	-47	-10	-15	8	-21	1547	1376	-171	-11.1%	
5	2025 - 2022	15min Later	Pleasant Valley Road & Penn Valley Dr.	-85	0	-18	0	-6	-45	0	0	0	2	-4	0	393	237	-156	-39.7%	

PM Peak Hour																				
#	Date	Peak Hour Change	Intersection	SBL	SBT	SBR	WBL	WBT	WBR	NBL	NBT	NBR	EBL	EBT	EBR	Total (2022)	Total (2025)	Difference	3-Year Growth	
1	2025 - 2022	15min Earlier	Pleasant Valley Road & Lake Wildwood Dr.	4	13	11	-19	10	-4	4	5	-48	12	9	0	1162	1159	-3	-0.3%	
2	2025 - 2022	No Change	Pleasant Valley Road & Pine Shadows Lane	0	-7	0	-1	0	-1	0	-17	1	0	0	0	978	953	-25	-2.6%	
3	2025 - 2022	No Change	Pleasant Valley Road & Commercial Ave.	-6	3	-3	-5	1	4	1	-30	5	-2	-1	-4	1119	1082	-37	-3.3%	
4	2025 - 2022	No Change	Pleasant Valley Road & Highway 20 (SR 20)	11	-25	22	-15	125	-7	-3	-8	3	-6	26	-1	1778	1900	122	+6.9%	
5	2025 - 2022	15min Earlier	Pleasant Valley Road & Penn Valley Dr.	-28	0	3	0	-11	-18	0	0	0	1	-5	0	409	351	-58	-14.2%	

Legend

- Increase in traffic volumes between 2022 and 2025
- Decrease in traffic volumes between 2022 and 2025

HCM 6th Signalized Intersection Summary
 4: Pleasant Valley Dr & Hwy 20

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	95	290	39	24	360	376	45	123	17	215	129	65
Future Volume (veh/h)	95	290	39	24	360	376	45	123	17	215	129	65
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1945	1870	1945	1870	1945	1870	1870	1870
Adj Flow Rate, veh/h	100	305	41	25	379	0	47	129	18	226	136	68
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	220	577	489	91	460		152	286	252	274	420	356
Arrive On Green	0.12	0.31	0.31	0.05	0.24	0.00	0.08	0.15	0.15	0.15	0.22	0.22
Sat Flow, veh/h	1781	1870	1585	1781	1945	1585	1853	1870	1648	1781	1870	1585
Grp Volume(v), veh/h	100	305	41	25	379	0	47	129	18	226	136	68
Grp Sat Flow(s),veh/h/ln	1781	1870	1585	1781	1945	1585	1853	1870	1648	1781	1870	1585
Q Serve(g_s), s	3.1	7.9	1.1	0.8	10.9	0.0	1.4	3.7	0.5	7.2	3.6	2.0
Cycle Q Clear(g_c), s	3.1	7.9	1.1	0.8	10.9	0.0	1.4	3.7	0.5	7.2	3.6	2.0
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	220	577	489	91	460		152	286	252	274	420	356
V/C Ratio(X)	0.46	0.53	0.08	0.27	0.82		0.31	0.45	0.07	0.82	0.32	0.19
Avail Cap(c_a), veh/h	634	1694	1435	634	1761		974	968	853	937	968	820
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	23.9	16.8	14.4	26.8	21.3	0.0	25.4	22.6	21.3	24.1	19.0	18.4
Incr Delay (d2), s/veh	1.1	0.3	0.0	1.2	1.4	0.0	1.4	1.3	0.1	2.4	0.2	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.2	2.7	0.3	0.3	4.2	0.0	0.6	1.5	0.2	2.8	1.3	0.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	25.0	17.1	14.5	28.0	22.7	0.0	26.8	24.0	21.5	26.5	19.2	18.5
LnGrp LOS	C	B	B	C	C		C	C	C	C	B	B
Approach Vol, veh/h		446			404			194			430	
Approach Delay, s/veh		18.6			23.0			24.4			22.9	
Approach LOS		B			C			C			C	
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	11.3	20.7	8.9	17.8	7.1	24.9	13.1	13.6				
Change Period (Y+Rc), s	4.1	6.8	4.1	4.6	4.1	6.8	4.1	4.6				
Max Green Setting (Gmax), s	20.9	53.2	30.9	30.4	20.9	53.2	30.9	30.4				
Max Q Clear Time (g_c+I1), s	5.1	12.9	3.4	5.6	2.8	9.9	9.2	5.7				
Green Ext Time (p_c), s	0.1	1.0	0.1	0.3	0.0	0.8	0.0	0.4				
Intersection Summary												
HCM 6th Ctrl Delay, s/veh			21.9									
HCM 6th LOS			C									
Notes												
Unsignalized Delay for [WBR] is excluded from calculations of the approach delay and intersection delay.												

HCM 6th Signalized Intersection Summary
4: Pleasant Valley Dr & Hwy 20

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	89	316	38	9	485	369	42	115	20	226	104	87
Future Volume (veh/h)	89	316	38	9	485	369	42	115	20	226	104	87
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1945	1870	1945	1870	1945	1870	1870	1870
Adj Flow Rate, veh/h	94	333	40	9	511	0	44	121	21	238	109	92
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	198	733	621	37	586		139	252	222	283	408	346
Arrive On Green	0.11	0.39	0.39	0.02	0.30	0.00	0.08	0.13	0.13	0.16	0.22	0.22
Sat Flow, veh/h	1781	1870	1585	1781	1945	1585	1853	1870	1648	1781	1870	1585
Grp Volume(v), veh/h	94	333	40	9	511	0	44	121	21	238	109	92
Grp Sat Flow(s),veh/h/ln	1781	1870	1585	1781	1945	1585	1853	1870	1648	1781	1870	1585
Q Serve(g_s), s	3.3	8.8	1.0	0.3	16.6	0.0	1.5	4.0	0.7	8.6	3.2	3.2
Cycle Q Clear(g_c), s	3.3	8.8	1.0	0.3	16.6	0.0	1.5	4.0	0.7	8.6	3.2	3.2
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	198	733	621	37	586		139	252	222	283	408	346
V/C Ratio(X)	0.47	0.45	0.06	0.24	0.87		0.32	0.48	0.09	0.84	0.27	0.27
Avail Cap(c_a), veh/h	559	1493	1265	559	1553		859	853	752	826	853	723
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	27.8	15.0	12.7	32.1	22.1	0.0	29.2	26.7	25.3	27.2	21.6	21.6
Incr Delay (d2), s/veh	1.3	0.2	0.0	2.5	1.6	0.0	1.5	1.7	0.2	2.6	0.1	0.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.3	3.0	0.3	0.2	6.4	0.0	0.7	1.7	0.3	3.5	1.3	1.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	29.1	15.2	12.7	34.6	23.7	0.0	30.7	28.4	25.5	29.9	21.8	21.8
LnGrp LOS	C	B	B	C	C		C	C	C	C	C	C
Approach Vol, veh/h		467			520			186			439	
Approach Delay, s/veh		17.8			23.9			28.6			26.1	
Approach LOS		B			C			C			C	
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	11.5	26.9	9.1	19.1	5.5	32.9	14.7	13.6				
Change Period (Y+Rc), s	4.1	6.8	4.1	4.6	4.1	6.8	4.1	4.6				
Max Green Setting (Gmax), s	20.9	53.2	30.9	30.4	20.9	53.2	30.9	30.4				
Max Q Clear Time (g_c+I1), s	5.3	18.6	3.5	5.2	2.3	10.8	10.6	6.0				
Green Ext Time (p_c), s	0.1	1.5	0.1	0.3	0.0	0.9	0.1	0.4				
Intersection Summary												
HCM 6th Ctrl Delay, s/veh			23.3									
HCM 6th LOS			C									
Notes												
Unsignalized Delay for [WBR] is excluded from calculations of the approach delay and intersection delay.												

HCM 6th Signalized Intersection Summary
4: Pleasant Valley Dr & Hwy 20

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	98	290	39	24	360	386	45	123	17	225	134	68
Future Volume (veh/h)	98	290	39	24	360	386	45	123	17	225	134	68
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1945	1870	1945	1870	1945	1870	1870	1870
Adj Flow Rate, veh/h	103	305	41	25	379	0	47	129	18	237	141	72
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	220	577	489	91	459		151	283	249	285	429	364
Arrive On Green	0.12	0.31	0.31	0.05	0.24	0.00	0.08	0.15	0.15	0.16	0.23	0.23
Sat Flow, veh/h	1781	1870	1585	1781	1945	1585	1853	1870	1648	1781	1870	1585
Grp Volume(v), veh/h	103	305	41	25	379	0	47	129	18	237	141	72
Grp Sat Flow(s),veh/h/ln	1781	1870	1585	1781	1945	1585	1853	1870	1648	1781	1870	1585
Q Serve(g_s), s	3.2	8.0	1.1	0.8	11.0	0.0	1.4	3.7	0.6	7.7	3.7	2.2
Cycle Q Clear(g_c), s	3.2	8.0	1.1	0.8	11.0	0.0	1.4	3.7	0.6	7.7	3.7	2.2
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	220	577	489	91	459		151	283	249	285	429	364
V/C Ratio(X)	0.47	0.53	0.08	0.27	0.83		0.31	0.46	0.07	0.83	0.33	0.20
Avail Cap(c_a), veh/h	626	1672	1417	626	1739		962	955	842	925	955	810
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	24.3	17.0	14.6	27.2	21.6	0.0	25.7	23.0	21.7	24.2	19.1	18.5
Incr Delay (d2), s/veh	1.1	0.3	0.0	1.2	1.5	0.0	1.4	1.4	0.1	2.4	0.2	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.2	2.7	0.3	0.3	4.2	0.0	0.6	1.6	0.2	3.0	1.4	0.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	25.4	17.3	14.6	28.4	23.0	0.0	27.1	24.4	21.8	26.6	19.3	18.6
LnGrp LOS	C	B	B	C	C		C	C	C	C	B	B
Approach Vol, veh/h		449			404			194			450	
Approach Delay, s/veh		18.9			23.4			24.8			23.0	
Approach LOS		B			C			C			C	
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	11.5	20.8	9.0	18.3	7.1	25.1	13.6	13.6				
Change Period (Y+Rc), s	4.1	6.8	4.1	4.6	4.1	6.8	4.1	4.6				
Max Green Setting (Gmax), s	20.9	53.2	30.9	30.4	20.9	53.2	30.9	30.4				
Max Q Clear Time (g_c+I1), s	5.2	13.0	3.4	5.7	2.8	10.0	9.7	5.7				
Green Ext Time (p_c), s	0.1	1.0	0.1	0.4	0.0	0.8	0.1	0.4				
Intersection Summary												
HCM 6th Ctrl Delay, s/veh			22.1									
HCM 6th LOS			C									
Notes												
Unsignalized Delay for [WBR] is excluded from calculations of the approach delay and intersection delay.												

HCM 6th Signalized Intersection Summary
 4: Pleasant Valley Dr & Hwy 20

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	92	316	38	9	485	379	42	115	20	236	109	90
Future Volume (veh/h)	92	316	38	9	485	379	42	115	20	236	109	90
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1945	1870	1945	1870	1945	1870	1870	1870
Adj Flow Rate, veh/h	97	333	40	9	511	0	44	121	21	248	115	95
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	199	732	621	37	585		139	249	220	292	416	353
Arrive On Green	0.11	0.39	0.39	0.02	0.30	0.00	0.07	0.13	0.13	0.16	0.22	0.22
Sat Flow, veh/h	1781	1870	1585	1781	1945	1585	1853	1870	1648	1781	1870	1585
Grp Volume(v), veh/h	97	333	40	9	511	0	44	121	21	248	115	95
Grp Sat Flow(s),veh/h/ln	1781	1870	1585	1781	1945	1585	1853	1870	1648	1781	1870	1585
Q Serve(g_s), s	3.5	8.9	1.1	0.3	16.8	0.0	1.5	4.0	0.8	9.1	3.4	3.3
Cycle Q Clear(g_c), s	3.5	8.9	1.1	0.3	16.8	0.0	1.5	4.0	0.8	9.1	3.4	3.3
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	199	732	621	37	585		139	249	220	292	416	353
V/C Ratio(X)	0.49	0.45	0.06	0.24	0.87		0.32	0.49	0.10	0.85	0.28	0.27
Avail Cap(c_a), veh/h	552	1474	1249	552	1533		848	842	743	816	842	714
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	28.2	15.2	12.8	32.5	22.4	0.0	29.6	27.1	25.7	27.4	21.7	21.7
Incr Delay (d2), s/veh	1.4	0.2	0.0	2.5	1.7	0.0	1.6	1.8	0.2	2.7	0.1	0.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.4	3.0	0.3	0.2	6.6	0.0	0.7	1.8	0.3	3.7	1.4	1.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	29.5	15.4	12.8	35.0	24.1	0.0	31.1	28.9	25.9	30.1	21.9	21.9
LnGrp LOS	C	B	B	D	C		C	C	C	C	C	C
Approach Vol, veh/h		470			520			186			458	
Approach Delay, s/veh		18.1			24.2			29.1			26.3	
Approach LOS		B			C			C			C	
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	11.6	27.1	9.2	19.6	5.5	33.2	15.2	13.6				
Change Period (Y+Rc), s	4.1	6.8	4.1	4.6	4.1	6.8	4.1	4.6				
Max Green Setting (Gmax), s	20.9	53.2	30.9	30.4	20.9	53.2	30.9	30.4				
Max Q Clear Time (g_c+I1), s	5.5	18.8	3.5	5.4	2.3	10.9	11.1	6.0				
Green Ext Time (p_c), s	0.1	1.5	0.1	0.3	0.0	0.9	0.1	0.4				
Intersection Summary												
HCM 6th Ctrl Delay, s/veh			23.6									
HCM 6th LOS			C									
Notes												
Unsignalized Delay for [WBR] is excluded from calculations of the approach delay and intersection delay.												

Response to Comments

Penn Valley Holiday Market Project
 Traffic Impact Analysis Memorandum (TIAM)
 November 2025

GTS# 03-NEV-2022-00505
 North State Grocery, Inc. – Holiday Market Project
 PLN24-0089; GPA24-0003; RZN24-0003; DVP24-2; MGT24-0001; EIS24-0007

#	Name	Comment (paraphrased to shorten)	Response
11/5/2025			
1	C. Murningham (Traffic Safety at Pine Shadows Ln.)	General concerns about operations of the main project ingress/egress at Pine Shadows Lane & Pleasant Valley Road	Comment noted. With proposed project traffic, the Pine Shadows Lane/Pleasant Valley Road intersection will be operating at acceptable levels during the AM peak hour (LOS B) and PM peak hour (LOS C). Peak hour traffic operations at this intersection assumed the existing two-way-left-turn-lane on Pleasant Valley Road. Since there were no significant project impacts at this intersection, further mitigation was not pursued. However, as a matter of course the Pine Shadows Lane/Pleasant Valley Road intersection will be improved to reflect current lane markings as recommended by Caltrans and the California Manual on Uniform Traffic Control Devices (CAMUTCD). The westbound Pine Shadows Lane approach will be striped for separate outbound left and right-turn lanes. In addition, a break in the two-way-left-turn markings on Pleasant Valley Road will be provided based on minor intersection control with a two-way-left-turn lane on the major street.
2	T. Marks (New Traffic Analysis Needed)	After reviewing the traffic report data at Placer, ai--- traffic volumes in the area have increased 14%.	Comment noted. Based on Caltrans historical and recent highway volume average daily traffic (ADT) data, traffic volumes at Highway 20 and Pleasant Valley Road have increased by 2% between 2022 and 2023. More importantly, new intersection data collection was very recently conducted on Pleasant Valley Road at all five project study intersections to augment 2022 data (October 2025-- attached). Based on new AM an PM peak period counts (7:00-9:00 a.m. & 4:00-6:00 p.m.), new peak hour traffic volumes have decreased at all five project study intersections compared to 2022 volumes with one exception; the Pleasant Valley Road/Highway 20 intersection. At this location, overall PM peak hour traffic volumes (only) increased by 6.9%. Using these new 2025 volumes, intersection LOS was re-calculated for both Existing (No Project) conditions and Existing plus Project to determine if any Signiant impacts could be expected from proposed project development. As calculated, PM peak hour operations at the Pleasant Valley Road/Highway 20 intersection would remain unchanged from previous 2022 levels. Overall intersection delay would increase by 1.4-1.5 seconds and intersection LOS would remain unchanged from previous acceptable levels.

#	Name	Comment (paraphrased to shorten)	Response
11/6/2025			
3	Gregory Hock (Traffic mitigation, timing, conditions, and construction plans)	<p>Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.</p>	<p>Comment noted--thank you.</p> <p>Proposed mitigation for the PVR/Highway 20 intersection is consistent with Nevada County's Regional Transportation Plan (NC RTP) as follows: Widen and/or re-stripe the intersection to add an additional southbound left-turn lane on Pleasant Valley Road and associated eastbound receiving/merge lane on eastbound Highway 20. Based on the County's NC RTP (Table 36), the total costs for these improvements are estimated at \$800,000 with funding sources from the County's Local Transportation Mitigation Fee (LTMF). The project applicant would contribute toward this estimated cost based on the County's fee schedule (see below). With planned Nevada County roadway improvements at the Pleasant Valley Road/Highway 20 intersection overall vehicle delay would improve slightly during the AM peak hour to aide in vehicle progression and queuing. The County is currently discussing proposed circulation improvements with Caltrans staff (including a Caltrans pedestrian project at the intersection). Timing for circulation improvements at the PVR/Highway 20 intersection is dependent on funding and status. With proposed project funding/fees, the intersections' status for improvements will be heightened and improvements will happen sooner.</p> <p>As noted in response #2, new intersection data collection was very recently conducted on Pleasant Valley Road at all five project study intersections to augment 2022 data (October 2025--attached). Based on new AM and PM peak period counts (7:00-9:00 a.m. & 4:00-6:00 p.m.), new peak hour traffic volumes have decreased at all five project study intersections compared to 2022 volumes with one exception; the Pleasant Valley Road/Highway 20 intersection. At this location, overall PM peak hour traffic volumes (only) increased by 6.9%. Using these new 2025 volumes, intersection LOS was re-calculated for both Existing (No Project) conditions and Existing plus Project to determine if any significant impacts could be expected from proposed project development. As calculated, PM peak hour operations at the Pleasant Valley Road/Highway 20 intersection would remain unchanged from previous 2022 levels. Overall intersection delay would increase by 1.4-1.5 seconds and intersection LOS would remain unchanged from previous acceptable levels.</p> <p>Nevada County can address this construction issue more clearly, but the County will require the development of temporary construction plans and how pedestrian/bike travel would be handled during project construction. These plans are typically provided after the project has been approved but prior to issuing a construction permit.</p> <p>Nevada County will provide information related to their emergency evacuation plan (EEP) and current roadway infrastructure in relation to proposed project development.</p>
4	Nick & Lisa Cruz (Traffic Lights need)	<p>Traffic lights are needed at the Pleasant Valley Road intersections.</p>	<p>Comment noted. With proposed project traffic, the Pine Shadows Lane/Pleasant Valley Road intersection will be operating at acceptable levels during the AM peak hour (LOS B) and PM peak hour (LOS C). Peak hour traffic operations at this intersection assumed the existing two-way-left-turn-lane on Pleasant Valley Road. Since there were no significant project impacts at this intersection, further mitigation was not pursued. However, as a matter of course the Pine Shadows Lane/Pleasant Valley Road intersection will be improved to reflect current lane markings as recommended by Caltrans and the California Manual on Uniform Traffic Control Devices (CAMUTCD). The westbound Pine Shadows Lane approach will be striped for separate outbound left and right-turn lanes. In addition, a break in the two-way-left-turn markings on Pleasant Valley Road will be provided based on minor intersection control with a two-way-left-turn lane on the major street.</p> <p>Mitigation has been recommended for the PVR/Commercial Avenue intersection that will allow it to operate at LOS D with proposed project traffic. With regard to signalization, the intersection currently meets the "peak hour" signal warrant under Existing (No Project) Conditions. However, due to the proximity of Commercial Avenue to Highway 20, a signal at the PVR/Commercial Avenue intersection would not function efficiently or allow the existing signal at PVR/Highway 20 intersection acceptable vehicle progression as coordination would be very difficult.</p>

#	Name	Comment (paraphrased to shorten)	Response
5	Jodie and Megan Porter	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.
6	Ruth Jacobsen	Endorses the proposed project development.	Comment noted--thank you.
7	Sandra Patterson	New market cannot be built without full traffic mitigation (traffic lights, additional lanes, traffic patterns).	Comment noted. Please see Response #3. In addition, both the PVR/Commercial Avenue and PVR/Pine Shadows Lane intersections will operate acceptably with traffic signals. With proposed project traffic, mitigation has been recommended for the westbound Commercial Avenue approach that will allow it to operate at LOS D. The PVR/Pine Shadows lane operates acceptably with proposed project traffic and the existing two-way-left-turn-lane on PVR. As noted, the Pine Shadows Lane/Pleasant Valley Road intersection will be improved to reflect current lane markings as recommended by Caltrans and the California Manual on Uniform Traffic Control Devices (CAMUTCD). The westbound Pine Shadows Lane approach will be striped for separate outbound left and right-turn lanes. In addition, a break in the two-way-left-turn markings on Pleasant Valley Road will be provided based on minor intersection control with a two-way-left-turn lane on the major street.
8	Wendy and Tom Jacobs	Location of the new market will cause traffic congestion and unsafe operations.	Comment noted. Please see Response #12.
9	Toni Johnson	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.
10	Mark Greenberg	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.
11	Victor Simon	Residents of Lake Wildwood will not be able to use their golf carts. Applicant should buy existing Thai restaurant space and expand into space	Comment noted.
12	Ray MacIntyre	Left-turn lane at the PVR/Pine Shadows Lane needed.	Comment noted. As noted, The PVR/Pine Shadows lane operates acceptably with proposed project traffic and the existing two-way-left-turn-lane on PVR. The Pine Shadows Lane/Pleasant Valley Road intersection will be improved to reflect current lane markings as recommended by Caltrans and the California Manual on Uniform Traffic Control Devices (CAMUTCD). The westbound Pine Shadows Lane approach will be striped for separate outbound left and right-turn lanes. In addition, a break in the two-way-left-turn markings on Pleasant Valley Road will be provided based on minor intersection control with a two-way-left-turn lane on the major street.

#	Name	Comment (paraphrased to shorten)	Response
11/7/2025			
13	Cathy Herzig	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.
14	Larry Cook	Please consider the LWW recommendations when considering your proposed plan	Comment noted.
15	Jim Scaduto	Large truck access with be difficult at the PVR/Commercial Avenue	Comment noted. Based on current truck delivery data for similar Holiday Market stores, the proposed project would experience approximately five (5) heavy truck deliveries per day. As the commentator indicates, heavy trucks accessing Pleasant Valley Road outbound from Commercial Avenue can experience delay during the peak AM and PM peak hour commute periods. This was observed during data collection for the intersection. However, southbound slow moving and queued traffic on Pleasant Valley Road at Highway 20 actually provides safer gaps for large trucks stopped on Commercial Avenue to merge onto the roadway. However, the project applicant indicates that large truck deliveries to the proposed project site will be limited to off-peak hours (late evening, early morning, and/or midday) to prevent large truck conflicts at the PVR/Commercial Avenue intersection.
16	Koral Igun	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.

#	Name	Comment (paraphrased to shorten)	Response
17	Mimi Davis	Re-location of existing market is not acceptable without mitigation.	<p>Comment noted. No new traffic signal is being proposed as part of project development. Mitigation has been recommended for the proposed project that will allow acceptable traffic flow conditions and intersection LOS at project study intersections as follows:</p> <p>Pleasant Valley Road/Commercial Avenue: Re-stripe the westbound Commercial Avenue approach to include a shared left-through lane and separate right-turn lane. With proposed project improvements for westbound Commercial Avenue, the NCC transit stop would be moved east to the north side of the existing Commercial Avenue cul-de-sac where the transit bus already turns around for convenience purposes. Transit stop improvements will be coordinated with Nevada County Connects. With proposed improvements, the Pleasant Valley Road/Commercial Avenue intersection overall LOS would improve from LOS E (46.5 seconds of delay) to LOS D (33.5 seconds of delay) during the PM. The Pleasant Valley Road/Commercial Avenue intersection would continue to qualify for the peak hour signal warrant during the PM peak hour with Existing plus Project traffic.</p> <p>Pleasant Valley Road/Highway 20: Widen and/or re-stripe the intersection to add an additional southbound left-turn lane on Pleasant Valley Road and associated eastbound receiving/merge lane on eastbound Highway 20. Based on the County's NCRTP (Table 36), the total costs for these improvements are estimated at \$600,000 with funding sources from the County's Local Transportation Mitigation Fee (LTMF). The project applicant would contribute toward this estimated cost based on the County's fee schedule. With planned Nevada County roadway improvements at the Pleasant Valley Road/Highway 20 intersection overall vehicle delay would improve slightly during the AM peak hour to aide in vehicle progression and queuing.</p> <p>Nevada County LTMF: The project applicant shall contribute to the County's LTMF based on the most recent Fee Schedule (County of Nevada Community Development Agency, Public Works Department, Traffic Impact Development Fees.</p> <p>The PVR/Pine Shadows lane operates acceptably with proposed project traffic and the existing two-way-left-turn-lane on PVR. The Pine Shadows Lane/Pleasant Valley Road intersection will be improved to reflect current lane markings as recommended by Caltrans and the California Manual on Uniform Traffic Control Devices (CAMUTCD). The westbound Pine Shadows Lane approach will be striped for separate outbound left and right-turn lanes. In addition, a break in the two-way-left-turn markings on Pleasant Valley Road will be provided based on minor intersection control with a two-way-left-turn lane on the major street.</p>
18	Larry Dews	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans. Bicycle traffic to/from the project site.	<p>Comment noted. Please see Response #3. In addition, bicycle traffic was considered as part of this overall analysis. Primarily, enhancing the bicycle connections between Penn Valley Drive (multi-use path) across Highway 20 to Commercial Avenue and the proposed project site. At this time, Caltrans is working on a project that would enhance pedestrian and bicycle access from Penn Valley Drive through the Highway 20 intersection at PVR to Commercial Avenue. Please note, the project applicant can only make improvements to their frontages on Pine Shadows Lane and the northerly extension of Commercial Avenue. However, local traffic mitigation fees paid by the project applicant can be applied to other facilities outside of the project frontage boundaries. The Nevada County Transportation Commission Bicycle Master Plan Update proposed Class II bike lanes on PVR between Lake Wildwood Drive and Highway 20. Nevada County could decide to use some of those fees to improve bicycle access on PVR between Lake Wildwood Drive and Highway 20.</p>
19	Rich Ellingsoni	Make sure there are no traffic problems.	Comment noted.
20	Frank Smith Jr.	Looking forward to new store.	Comment noted.

#	Name	Comment (paraphrased to shorten)	Response
11/8/2025			
21	Ted Gulustian	Concerned over additional traffic and lack of light signal and traffic data.	Comment noted. As noted, The PVR/Pine Shadows lane operates acceptably with proposed project traffic and the existing two-way-left-turn-lane on PVR. The Pine Shadows Lane/Pleasant Valley Road intersection will be improved to reflect current lane markings as recommended by Caltrans and the California Manual on Uniform Traffic Control Devices (CAMUTCD). The westbound Pine Shadows Lane approach will be striped for separate outbound left and right-turn lanes. In addition, a break in the two-way-left-turn markings on Pleasant Valley Road will be provided based on minor intersection control with a two-way-left-turn lane on the major street.
22	Clark Mehr	Please work a safe traffic plan for the new Holiday Market.	Comment noted. Please see Response #3.
23	Terry and Annette Bichlmeier	Please assure all measures at taken including traffic signals, stop signs, additional lanes to avoid traffic backups on Highway 20 and Pleasant Valley Road	Comment noted. Please see Responses #1 & #3.
11/10/2025			
24	Paul Oppenheim	Please assure all measures at taken including traffic signals, stop signs, additional lanes to avoid traffic backups on Highway 20 and Pleasant Valley Road	Comment noted. Please see Responses #1 & #3.
11/11/2025			
25	Margaret Lopez	The PVR/Commercial Avenue intersection suffers from poor lane access and increased traffic will only lead to further congestion.	Comment noted. Please see Response #5.
11/12/2025			
26	John Worthing Davis	The PVR/Commercial Avenue is dangerous. Downhill speeds make it difficult to turn into Commercial Avenue and the intersection needs to be re-built.	<p>Comment noted. When exiting Commercial Avenue, care must taken by outbound motorists to ensure adequate "gaps" in traffic on Pleasant Valley Road to make left, right, or through movements. Ironically, the signalized intersection at PVR/Highway 20 helps to provide gaps in traffic flow on PVR by not allowing constant flow north-south on the roadway. Initial analyses of traffic flow along PVR with a signal at both intersections (Commercial Avenue & Highway 20) indicated that adequate vehicle progression could not be maintained due to the proximity of the two signals between Commercial Avenue and Highway 20. Proposed project analysis indicates that both the PVR/Commercial Avenue and PVR/Pine Shadows Lane will operate acceptably with proposed project traffic and recommended mitigation (at Commercial Avenue). It is noted that (if approved), the proposed project would provide an extension of Commercial Avenue north into the project site extending through to Pine Shadows Lane. Outbound motorists currently using Commercial Avenue to access PVR will likely find easier to use Commercial Avenue north through the project site to access Pine Shadows Lane. They would then turn out onto PVR at Pine Shadows Lane to provide them better access and merging opportunities.</p> <p>Golf carts were observed using the PVR/Lake Wildwood Drive intersection when performing data collection (and were counted as a vehicle trip). However, it is not known where the golf cart trip destination within the Shopping Center.</p>
27	Cathy Mcdade	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans. Bicycle traffic to/from the project site.	Comment noted. Please see Response #3.

#	Name	Comment (paraphrased to shorten)	Response
11/13/2025			
28	Colin Jaques	The increase in traffic can be handled within the existing infrastructure.	Comment noted.
29	Barbara Tagg	Any chance golf carts can access the project.	Comment noted. Unfortunately, golf carts are not allowed on public street ROW's except where designated/permitted by the lead agency and only on golf cart routes.
30	Fred Huberty	The traffic going to/from the market going south will have a significant problem. Evacuation route problems. No dates for recommended improvements.	<p>Comment noted. When exiting Commercial Avenue, care must taken by outbound motorists to ensure adequate "gaps" in traffic on Pleasant Valley Road to make left, right, or through movements. Ironically, the signalized intersection at PVR/Highway 20 helps to provide gaps in traffic flow on PVR by not allowing constant flow north-south on the roadway. Initial analyses of traffic flow along PVR with a signal at both intersections (Commercial Avenue & Highway 20) indicated that adequate vehicle progression could not be maintained due to the proximity of the two signals between Commercial Avenue and Highway 20. Proposed project analysis indicates that both the PVR/Commercial Avenue and PVR/Pine Shadows Lane will operate acceptably with proposed project traffic and recommended mitigation (at Commercial Avenue). It is noted that (if approved), the proposed project would provide an extension of Commercial Avenue north into the project site extending through to Pine Shadows Lane. Outbound motorists currently using Commercial Avenue to access PVR will likely find easier to use Commercial Avenue north through the project site to access Pine Shadows Lane. They would then turn out onto PVR at Pine Shadows Lane to provide them better access and merging opportunities.</p> <p>Nevada County will provide information related to their emergency evacuation plan (EEP) and current roadway infrastructure in relation to proposed project development.</p> <p>All recommended mitigation for circulation improvements under "Existing plus Project" Conditions will be funded by the project applicant. In addition, the project applicant will contribute to the County's LTMF based on the most recent Fee Schedule (County of Nevada Community Development Agency, Public Works Department, Traffic Impact Development Fees for circulation improvements at the PVR/Highway 20 intersection.</p>
31	Denise Didario	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.
11/14/2025			
32	Donald Boeding	Concerns presented by the Lake Wildwood BOD for acceptable mitigation plan for the proposed project.	Comment noted.
33	Carolyn Anderson	Emergency Evacuation Plan not adequate in case of fire with development of proposed project.	Comment noted. Nevada County will provide information related to their emergency evacuation plan (EEP) and current roadway infrastructure in relation to proposed project development.
34	Bruce Newland	A proper traffic study should be conducted to avoid congestion and inconvenience.	Comment noted.
11/15/2025			
35	Chip Whitehouse	Need the new Holiday Market--supports.	Comment noted.
36	Drew	Making improvement to community --- supports	Comment noted.

#	Name	Comment (paraphrased to shorten)	Response
37	Ed Keegan	Was mitigation recommended for the PVR/Highway 20 intersection, truck access from Commercial Avenue and/or alternative hours-access, dedicated southbound left-turn lane at Pine Shadows Lane, EEP plans, reduce vehicle speeds on PVR, perform additional traffic counts.	<p>Comment noted. The comment topics will each be addressed as follows: The PVR/Highway 20 intersection operates at an acceptable LOS with Existing plus Project traffic (LOS C). By County standards, no significant impact was found. However, proposed project traffic would add to existing vehicle queuing at the intersection. As a result, the proposed project will contribute to the County's local Traffic Impact Mitigation (LTMF) program for proposed circulation improvements at the PVR/Highway 20 intersection. Based on the County's Regional Transportation Plan (NCRTP), an additional southbound left-turn lane would be added to the intersection with an associated receiving lane on Highway 20 with costs estimated at \$803,000. The County is currently discussing circulation improvements at the intersection (in addition to Caltrans current pedestrian/bicycle improvements) and estimates that improvements could be initiated by 2027.</p> <p>When exiting Commercial Avenue, care must be taken by outbound motorists to ensure adequate "gaps" in traffic on Pleasant Valley Road to make left, right, or through movements. Ironically, the signalized intersection at PVR/Highway 20 helps to provide gaps in traffic flow on PVR by not allowing constant flow north-south on the roadway. Initial analyses of traffic flow along PVR with a signal at both intersections (Commercial Avenue & Highway 20) indicated that adequate vehicle progression could not be maintained due to the proximity of the two signals between Commercial Avenue and Highway 20. Proposed project analysis indicates that both the PVR/Commercial Avenue and PVR/Pine Shadows Lane will operate acceptably with proposed project traffic and recommended mitigation (at Commercial Avenue). It is noted that (if approved), the proposed project would provide an extension of Commercial Avenue north into the project site extending through to Pine Shadows Lane. Outbound motorists currently using Commercial Avenue to access PVR will likely find it easier to use Commercial Avenue north through the project site to access Pine Shadows Lane. They would then turn out onto PVR at Pine Shadows Lane to provide them better access and merging opportunities.</p> <p>Based on current truck delivery data for similar Holiday Market stores, the proposed project would experience approximately five (5) heavy truck deliveries per day. As the commentator indicates, heavy trucks accessing Pleasant Valley Road outbound from Commercial Avenue can experience delay during the peak AM and PM peak hour commute periods. This was observed during data collection for the intersection. However, southbound slow moving and queued traffic on Pleasant Valley Road at Highway 20 actually provides safer gaps for large trucks stopped on Commercial Avenue to merge onto the roadway. However, the project applicant indicates that large truck deliveries to the proposed project site will be limited to off-peak hours (late evening, early morning, and/or midday) to prevent large truck conflicts at the PVR/Commercial Avenue intersection.</p>
38	Ed Keegan (Continued)	Was mitigation recommended for the PVR/Highway 20 intersection, truck access from Commercial Avenue and/or alternative hours-access, dedicated southbound left-turn lane at Pine Shadows Lane, EEP plans, reduce vehicle speeds on PVR, perform additional traffic counts.	<p>The PVR/Pine Shadows lane operates acceptably with proposed project traffic and the existing two-way-left-turn-lane on PVR. The Pine Shadows Lane/Pleasant Valley Road intersection will be improved to reflect current lane markings as recommended by Caltrans and the California Manual on Uniform Traffic Control Devices (CAMUTCD). The westbound Pine Shadows Lane approach will be striped for separate outbound left and right-turn lanes. In addition, a break in the two-way-left-turn markings on Pleasant Valley Road will be provided based on minor intersection control with a two-way-left-turn lane on the major street.</p> <p>Nevada County will provide information related to their emergency evacuation plan (EEP) and current roadway infrastructure in relation to proposed project development.</p> <p>Nevada County and Caltrans are currently discussing circulation improvements for the PVR/Highway 20 intersection. It is likely that all potential improvements (in addition to recommendations from the NCRTP). This will likely include an intersection safety and operational assessment process (ISOAP) for the intersection which will consider all improvements (signal adjustments, lane additions, roundabout).</p> <p>Nevada County can consider vehicle speed reductions in the area along PVR as part of overall County speed survey E&TS analysis.</p>
39	John B. Field	Supports the Penn Valley Holiday Market.	Comment noted.

#	Name	Comment (paraphrased to shorten)	Response
40	Linda Ennis	Concerns about EEP, roadway improvements, and market re-location.	<p>Comment noted.</p> <p>Nevada County will provide information related to their emergency evacuation plan (EEP) and current roadway infrastructure in relation to proposed project development.</p> <p>Pleasant Valley Road cannot support a four-lane roadway at this time due to ROW restrictions (no do current traffic volumes support widening of the roadway). However, the PVR/Highway 20 intersection does support circulation improvements to reduce overall vehicle queuing. Proposed project mitigation has been recommended to help fund recommended circulation improvements at this intersection based on the NC RTP.</p> <p>Adjacent expansion to the existing Thai restaurant has not been analyzed for this study.</p>
11/16/2025			
41	Jeff Hyser	Concerns about traffic operations at the PVR/Commercial Avenue and PVR/Pine Shadows Lane intersection.	<p>Comment noted. When exiting Commercial Avenue, care must taken by outbound motorists to ensure adequate "gaps' in traffic on Pleasant Valley Road to make left, right, or through movements. Ironically, the signalized intersection at PVR/Highway 20 helps to provide gaps in traffic flow on PVR by not allowing constant flow north-south on the roadway. Initial analyses of traffic flow along PVR with a signal at both intersections (Commercial Avenue & Highway 20) indicated that adequate vehicle progression could not be maintained due to the proximity of the two signals between Commercial Avenue and Highway 20. Proposed project analysis indicates that both the PVR/Commercial Avenue and PVR/Pine Shadows Lane will operate acceptably with proposed project traffic and recommended mitigation (at Commercial Avenue). It is noted that (if approved), the proposed project would provide an extension of Commercial Avenue north into the project site extending through to Pine Shadows Lane. Outbound motorists currently using Commercial Avenue to access PVR will likely find easier to use Commercial Avenue north through the project site to access Pine Shadows Lane. They would then turn out onto PVR at Pine Shadows Lane to provide them better access and merging opportunities. In addition, the majority of proposed project trips at this intersection are north-south through-traffic on PVR or inbound (eastbound) trips on Commercial Avenue. Only 5% of the proposed project trips are anticipated to use Commercial Avenue in the outbound direction onto PVR which amount to 2 vehicle trips in the AM peak hour and 7 vehicle trips in the PM peak hour.</p> <p>The PVR/Pine Shadows lane operates acceptably with proposed project traffic and the existing two-way-left-turn-lane on PVR. The Pine Shadows Lane/Pleasant Valley Road intersection will be improved to reflect current lane markings as recommended by Caltrans and the California Manual on Uniform Traffic Control Devises (CAMUTCD). The westbound Pine Shadows Lane approach will be striped for separate outbound left and right-turn lanes. In addition, a break in the two-way-left-turn markings on Pleasant Valley Road will be provided based on minor intersection control with a two-way-left-turn lane on the major street. Vehicle queuing for left-turn lane demand would be five (5) vehicles (125') during the peak demand period with adequate storage in the two-way-left-turn-lane (250'+).</p> <p>Vehicle sight distance from Pine Shadows lane sighting north-south on PVR requires 430-feet based on a design speed of 50 mph (speed limit is 45 mph) and is adequate.</p>
42	Jim Sartori	Supports the Penn Valley Holiday Market.	Comment noted.
43	Kari Taketa	Supports the Penn Valley Holiday Market.	Comment noted.

#	Name	Comment (paraphrased to shorten)	Response
44	Paul Barbara	PVR has not been improved since 1990's, no new traffic counts, EEP for LWW, potential Starbucks use, turn lanes at Highway 20, extension of Commercial Avenue.	<p>Comment noted.</p> <p>New traffic volume data was collected in October 2025 to confirm or dispel the use of previous year 2022 volume data used for the analysis. New intersection data collection was very recently conducted on Pleasant Valley Road at all five project study intersections to augment 2022 data (October 2025--attached). Based on new AM an PM peak period counts (7:00-9:00 a.m. & 4:00-6:00 p.m.), new peak hour traffic volumes have decreased at all five project study intersections compared to 2022 volumes with one exception; the Pleasant Valley Road/Highway 20 intersection. At this location, overall PM peak hour traffic volumes (only) increased by 6.9%. Using these new 2025 volumes, intersection LOS was re-calculated for both Existing (No Project) conditions and Existing plus Project to determine if any significant impacts could be expected from proposed project development. As calculated, PM peak hour operations at the Pleasant Valley Road/Highway 20 intersection would remain unchanged from previous 2022 levels. Overall intersection delay would increase by 1.4-1.5 seconds and intersection LOS would remain unchanged from previous acceptable levels.</p> <p>Nevada County will provide information related to their emergency evacuation plan (EEP) and current roadway infrastructure in relation to proposed project development.</p> <p>A potential Starbucks cafe/station within the store is not part of the current project description.</p> <p>The PVR/Highway 20 intersection operates at an acceptable LOS with Existing plus Project traffic (LOS C). By County standards, no significant impact was found. However, proposed project traffic would add to existing vehicle queuing at the intersection. As a result, the proposed project will contribute to the County's local Traffic Impact Mitigation (LTMF) program for proposed circulation improvements at the PVR/Highway 20 intersection. Based on the County's Regional Transportation Plan (NCRTP), an additional southbound left-turn lane would be added to the intersection with an associated receiving lane on Highway 20 with costs estimated at \$803,000. The County is currently discussing circulation improvements at the intersection (in addition to Caltrans current pedestrian/bicycle improvements) and estimates that improvements could be initiated by 2027.</p> <p>Comment noted on Commercial Avenue.</p>
45	Pat Tillman	Supports the Penn Valley Holiday Market.	Comment noted.
46	Teresa Scott	Supports the Penn Valley Holiday Market.	Comment noted.
11/17/2025			
47	Julie Jasper	Supports the Penn Valley Holiday Market.	Comment noted.
48	Katy Davis	Supports the Penn Valley Holiday Market.	Comment noted.
49	Marc Friedland	Need the new Holiday Market--supports.	Comment noted.
50	Marla Odegard	Making improvement to community --- supports	Comment noted.
51	Patrick and Susan Gavigan	Supports the Penn Valley Holiday Market.	Comment noted.

#	Name	Comment (paraphrased to shorten)	Response
52	Ray Favetti	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.
53	Randy Nahas	The Pine Shadows Lane intersection at PVR will be a very attractive alternative to Commercial Avenue should the project be approved and a northerly connection is made through the project site. Not just for Holiday Market patrons but other existing businesses on Commercial Avenue and future development of the site.	Comment noted.
54	Sarah Barbara	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.
55	Jack and Sue Reynolds	Proposed traffic mitigation at the Pleasant Valley Road/Highway 20 intersection and time frame; Data that indicates existing conditions have not changed since August 2022; Vehicle and pedestrian flow construction plans; the County should provide assurances that their EVA will not be impacted by plans.	Comment noted. Please see Response #3.
56	Ken and Sandy Turner	Traffic congestion at PVR/Highway 20 intersection.	Comment noted. The PVR/Highway 20 intersection operates at an acceptable LOS with Existing plus Project traffic (LOS C). By County standards, no significant impact was found. However, proposed project traffic would add to existing vehicle queuing at the intersection. As a result, the proposed project will contribute to the County's local Traffic Impact Mitigation (LTMF) program for proposed circulation improvements at the PVR/Highway 20 intersection. Based on the County's Regional Transportation Plan (NCRTP), an additional southbound left-turn lane would be added to the intersection with an associated receiving lane on Highway 20 with costs estimated at \$803,000. The County is currently discussing circulation improvements at the intersection (in addition to Caltrans current pedestrian/bicycle improvements) and estimates that improvements could be initiated by 2027.
57	Vince Stella	Supports the Penn Valley Holiday Market.	Comment noted.
11/18/2025			
58	Dominic Perri	Need the new Holiday Market--supports.	Comment noted.
59	Perla Lovejoy	Supports the Penn Valley Holiday Market.	Comment noted.
60	Sharon and John Langford	Supports the Penn Valley Holiday Market.	Comment noted.

#	Name	Comment (paraphrased to shorten)	Response
61	Sylvia and John Wright	Supports the addition of a second southbound left-turn lane on PVR at the Highway 20 intersection. Supports the proposed Penn Valley Holiday Market.	Comment noted.
62	Mr. John Favetti (Lake Wildwood should pay for bike path/walkway/concrete sidewalk on PVR)	LWW HOA should provide bike path/walkway/concrete sidewalk on PVR	Comment noted
63	Ms. Shirlyn Vogel (Proximity of Highway 20 to Commercial Avenue and Pine Shadows Lane)	Highway 20 is too close to Commercial Avenue and Pine Shadows Lane for proposed project traffic to enter safely.	Comment noted. When exiting Commercial Avenue, care must be taken by outbound motorists to ensure adequate "gaps" in traffic on Pleasant Valley Road to make left, right, or through movements. Ironically, the signalized intersection at PVR/Highway 20 helps to provide gaps in traffic flow on PVR by not allowing constant flow north-south on the roadway. Initial analyses of traffic flow along PVR with a signal at both intersections (Commercial Avenue & Highway 20) indicated that adequate vehicle progression could not be maintained due to the proximity of the two signals between Commercial Avenue and Highway 20. Proposed project analysis indicates that both the PVR/Commercial Avenue and PVR/Pine Shadows Lane will operate acceptably with proposed project traffic and recommended mitigation (at Commercial Avenue). It is noted that (if approved), the proposed project would provide an extension of Commercial Avenue north into the project site extending through to Pine Shadows Lane. Outbound motorists currently using Commercial Avenue to access PVR will likely find it easier to use Commercial Avenue north through the project site to access Pine Shadows Lane. They would then turn out onto PVR at Pine Shadows Lane to provide them better access and merging opportunities.
64	Mr. Chris Maxwell (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
65	Mr. William Floyd (leaning towards endorsing project. Has it been reviewed by emergency agencies)	Has the project plan been reviewed by PV Fire District, NC Sheriff's Office, and County Emergency Services	Comment noted. Nevada County staff will typically provide opportunity for first responders and emergency services to review and respond to proposed project development.

#	Name	Comment (paraphrased to shorten)	Response
66	Mr. Cleveland Wallace (Mitigation, timing of improvement, evacuation plan)	Suggested mitigation inadequate, timing of circulation improvements, interfere with large scale evacuation	Comment noted. Please see Response #3. In addition to suggested mitigation for the PVR/Highway 20 intersection, mitigation has also been recommended for the PVR/Commercial Avenue intersection that will allow it to operate at acceptable conditions (LOS D or better) with proposed project traffic. In addition, the project applicant will contribute local traffic mitigation fees (LTMF) based on the County fee schedule to assist in moving up/accelerating the recommended NCRTP circulation improvements for the PVR/Highway 20 intersection. As noted, Nevada County will provide information related to their emergency evacuation plan (EEP) and current roadway infrastructure in relation to proposed project development.
11/19/2025			
67	Ms. Carisssa Gannon (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
68	Delta S Penn Valley Veterinary Associates (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
69	Issac and Susan Bass (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
70	Ms. Jeannie Gleason (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
71	Jon and Julie Tucker (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
72	Jerriann Wasson (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
73	Kristen Adams, Realtor (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
74	Ms. Sharon Blume (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.

#	Name	Comment (paraphrased to shorten)	Response
75	Mr. Bert Tomasino (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
11/20/2025			
76	Ms. Mary Rist (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
77	Ms. Bonnie Field (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
78	Mr. Steven Kuester (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
79	Ms. Cheri Merrifield (Supports Project)	Supports investment of Holiday Market in LWW Community.	Comment noted.
80	Nancy and Ross Guenther	Concerned about PVR/Commercial Avenue intersection and operations in the evening.	Comment noted. Please see Response # 63.
81	Ms. Ali Gencarelle	Supports investment of Holiday Market in LWW Community.	Comment noted.
82	Ms. Susan Rappaport	Supports investment of Holiday Market in LWW Community.	Comment noted.
83	Ms. Constance LaTrelle	Supports investment of Holiday Market in LWW Community.	Comment noted.
84	Mr. Len Stevens	Supports investment of Holiday Market in LWW Community.	Comment noted.
85	Mr. Colin Irwin & David Schiffelbein	Supports investment of Holiday Market in LWW Community.	Comment noted.
86	Kiso Cannon	Supports investment of Holiday Market in LWW Community.	Comment noted.
87	Mr. Charles Carroll	Supports investment of Holiday Market in LWW Community.	Comment noted.
88	Mr. Ken Rohrbach	Supports investment of Holiday Market in LWW Community.	Comment noted.
89	Bruce and Lynn McDermott	Supports investment of Holiday Market in LWW Community.	Comment noted.

#	Name	Comment (paraphrased to shorten)	Response
11/20/2025			
90	Janice and Wayne Siegfried	Supports investment of Holiday Market in LWW Community.	Comment noted.
91	Ms. Geni Whitehouse	Supports investment of Holiday Market in LWW Community.	Comment noted.
92	Ms. Jodeana Patterson	Supports investment of Holiday Market in LWW Community.	Comment noted.
93	Ms. Sandi Weyand	Supports investment of Holiday Market in LWW Community.	Comment noted.
94	Mr. Jeremy Hale	Supports investment of Holiday Market in LWW Community.	Comment noted.
95	Mr. Mark Danckert	Supports investment of Holiday Market in LWW Community.	Comment noted.
96	Mr. Dave Watt	Does not support project. Cannot drive golf cart to the new location.	Comment noted.
97	Ms. Paulette Snyders	Supports investment of Holiday Market in LWW Community.	Comment noted.

Existing Traffic Counts (2025 vs. 2022)

Penn Valley Holiday Market Project

AM Peak Hour																			
#	Date	Peak Hour Change	Intersection	SBL	SBT	SBR	WBL	WBT	WBR	NBL	NBT	NBR	EBL	EBT	EBR	Total (2022)	Total (2025)	Difference	3-Year Growth
1	2025 - 2022	15min Later	Pleasant Valley Road & Lake Wildwood Dr.	-28	-100	-14	-60	2	-19	-11	-20	-4	-11	-5	-10	1049	769	-280	-26.7%
2	2025 - 2022	15min Later	Pleasant Valley Road & Pine Shadows Lane	0	-125	0	0	0	1	0	-58	-1	0	0	0	878	695	-183	-20.8%
3	2025 - 2022	15min Later	Pleasant Valley Road & Commercial Ave.	-20	-120	-1	-1	1	4	-3	-65	9	0	0	-7	1001	798	-203	-20.3%
4	2025 - 2022	15min Earlier	Pleasant Valley Road & Highway 20 (SR 20)	-18	-85	0	-3	32	-7	-5	-47	-10	-15	8	-21	1547	1376	-171	-11.1%
5	2025 - 2022	15min Later	Pleasant Valley Road & Penn Valley Dr.	-85	0	-18	0	-6	-45	0	0	0	2	-4	0	393	237	-156	-39.7%

PM Peak Hour																			
#	Date	Peak Hour Change	Intersection	SBL	SBT	SBR	WBL	WBT	WBR	NBL	NBT	NBR	EBL	EBT	EBR	Total (2022)	Total (2025)	Difference	3-Year Growth
1	2025 - 2022	15min Earlier	Pleasant Valley Road & Lake Wildwood Dr.	4	13	11	-19	10	-4	4	5	-48	12	9	0	1162	1159	-3	-0.3%
2	2025 - 2022	No Change	Pleasant Valley Road & Pine Shadows Lane	0	-7	0	-1	0	-1	0	-17	1	0	0	0	978	953	-25	-2.6%
3	2025 - 2022	No Change	Pleasant Valley Road & Commercial Ave.	-6	3	-3	-5	1	4	1	-30	5	-2	-1	-4	1119	1082	-37	-3.3%
4	2025 - 2022	No Change	Pleasant Valley Road & Highway 20 (SR 20)	11	-25	22	-15	125	-7	-3	-8	3	-6	26	-1	1778	1900	122	+6.9%
5	2025 - 2022	15min Earlier	Pleasant Valley Road & Penn Valley Dr.	-28	0	3	0	-11	-18	0	0	0	1	-5	0	409	351	-58	-14.2%

Legend

- Increase in traffic volumes between 2022 and 2025
- Decrease in traffic volumes between 2022 and 2025

From: [Jeannie Gleason](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Wednesday, November 19, 2025 1:18:39 PM

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11/19/25

Dear Mr. Geiger,

I support the idea of building a new Holiday Market on Pleasant Valley Road in Penn Valley as Holiday Market has proven to be so useful to the residents in Western Nevada County. I vote yes for a new store.

Sincerely,

Jeannie Gleason, Penn Valley resident

From: [Kristen Adams](#)
To: [Steve Geiger](#)
Subject: Penn Valley Holiday Market
Date: Wednesday, November 19, 2025 6:46:51 PM

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Dear Steve,

It is my understanding that the new Holiday Market that is proposed to be built in Penn Valley is not a "done deal." I am writing to show support of the project and encourage final approval. I, along with SO many others, shop at the Holiday Market multiple times per week. I am so excited to have a new, bigger store with more options for we consumers.

Thank you!

Kristen Adams



Kristen Adams, Realtor

530-802-0723

776-B Freeman Lane
Grass Valley, CA 95949

www.kristenadamsrealtor.com

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From: [Debbie Dajas](#)
To: [Steve Geiger](#)
Subject: Holiday Market Penn Valley
Date: Wednesday, November 19, 2025 6:49:06 PM

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Hello Steve,

as a resident and an employee in the Penn Valley area I just want to tell you that I and so many of my friends, family and acquaintances are very much looking forward to the opening of our new Holiday Market!!! I shop at the one on Combie road whenever I go to Auburn as it is so much larger than our store so naturally has a much larger selection to offer.

I have always loved our little Holiday Market and I think the new, larger store will be a big boost to this area, I really hate having to go into Grass Valley to go to the grocery store!

I realize that Lake Wildwood is trying to have their residents throw up roadblocks for this move, please keep in mind that this is not Lake Wildwood's personal store. Having it further down Pleasant Valley Road will help with the traffic congestion at the intersection at Wildwood's main gate as well as providing more parking for the customers, I all too often have trouble parking at the current location.

I think this is a great move and will benefit everyone in this community, Please help this to happen ASAP!

Respectfully,

Debbie Dajas

Delta S

Penn Valley Veterinary Associates

P.O. Box 369

17404 Penn Valley Drive

Penn Valley, CA 95946

(530) 432-3125 phone

(530) 432-3460 fax

From: [Jon and Julie Tucker](#)
To: [Steve Geiger](#)
Subject: New Holiday Market Store
Date: Wednesday, November 19, 2025 7:05:05 PM

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I wanted to write in my support of the new Holiday Market store moving locations. This is wonderful news and we fully support it! There is so much growth opportunities for new jobs and overall be a great thing for Holiday market and the area!
Sincerely,
Julie Tucker a Lake Wildwood resident

From: [Carissa Gannon](#)
To: [Steve Geiger](#)
Subject: Holiday market Penn valley
Date: Wednesday, November 19, 2025 7:17:32 PM

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Steve Geiger,

Please receive this email to voice my support of the development of a new holiday market grocery store location in Penn valley. Our community serves far more than just lake wildwood residence and having a bigger grocery store that can better serve our diverse population as well as providing much needed improvements to accessing some of our existing businesses in the area is a win for our community.

Sincerely

A Penn valley resident
Carissa Gannon

From: [jerriann wasson](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Wednesday, November 19, 2025 7:45:08 PM

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Hi,

I'm writing in response to a letter someone posted online from Holiday Market. I live on Pleasant Valley road. We absolutely need a larger store in Penn Valley. If Lake wild Wood is opposing this new venture shame on them. The current store is too small. Penn Valley is in dire need of a deli and bakery. Places to shop and eat are very limited here as I'm sure you know. Lake Wild Wood golf carts crossing Pleasant Valley road is a hazard anyway. They have problems in their cars trying to decide if it's their turn to go or not. Please support Holiday Market.

Thank you,

Jerriann Wasson

From: [Sharon Blume](#)
To: [Steve Geiger](#)
Subject: I support a New Holiday Market
Date: Wednesday, November 19, 2025 8:43:52 PM

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I'm a Penn Valley resident & homeowner.

Holiday Market needs to expand & replace the dilapidated stinky building they occupy. It is an unpleasant experience to go in that store.

Please support Holiday in their plans to expand & build a new store for the residents of the area.

Lake Wildwood residents must be very selfish & entitled to try to oppose this positive endeavor.
Thank you.

Sincerely,
Sharon Blume
15320 Chisum Trail
Penn Valley CA 95946

Sent from my iPhone

From: Bert Tomasino
To: Steve Geiger
Subject: New Holiday Market Store
Date: Wednesday, November 19, 2025 8:53:02 PM

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Steve,

I support the new Holiday Market in Penn Valley.

You had me at Deli and Bakery.

Bert Tomasino
Lake Wildwood Resident

Sent from Yahoo Mail for iPhone

From: [svbass](#)
To: [Steve Geiger](#)
Subject: Proposed Holiday Market in Penn Valley
Date: Wednesday, November 19, 2025 11:13:48 PM

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Dear Mr. Geiger,

I am writing, as a resident family of Lake Wildwood, to support the approval of a new market location in Penn Valley. My preference would have been for Holiday Market to expand at their current location, but it's my understanding that that is not possible.

Holiday Market is a great neighborhood market, and it would be a disaster if the community were to lose them. Please do all that is possible to expedite their approval.

Thank you,

Isaac and Susan Bass
28956 Chaparral Drive
Penn Valley, CA 95946
Sent from my iPad

From: [Mary Rist](#)
To: [Steve Geiger](#)
Subject: Holiday Market in Penn Valley
Date: Thursday, November 20, 2025 12:04:57 AM

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Hello Steve,

My name is Mary Rist, I grew up in Nevada County and have been a Penn Valley resident since 1990, 35 years. I was excited to hear of the new Holiday Market location as I felt it would be a better location with easier access and surly I would shop there more instead of driving into Grass Valley.

However, today I read some negative views regarding the development, many coming from Lake Wildwood residents about not being able to drive their golf carts to the new location.

It will be a great dis-service to both Penn Valley and Lake Wildwood residents if this project is held up, delayed or canceled due to a few ridiculous claims by a handful of people. And it sounds like there may be some direct access planned from Lake Wildwood to the new location anyway.

Thank you for taking my opinion into account. I hope the new market project goes smoothly and I hope you will support this project as well.

Kind Regards,

Mary Rist
13875 Oak Ridge Rd.
Penn Valley, CA 95946
(530) 798-3554

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From: [Bonnie Field](#)
To: [Steve Geiger](#)
Subject: Support for the new Holiday Market
Date: Thursday, November 20, 2025 6:57:31 AM

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Hello Steve,

As owners of property at Lake Wildwood since 1980, our family has seen many changes to the shopping center at Wildwood. The Holiday Market has been an anchor tenant and has shown the ability to relevantly adapt to market demands, albeit within a small footprint and with limited parking.

Our family is wholeheartedly in support of the new proposed market at Highway 20 / Commercial Avenue. From what we've learned of the project, the larger market will address even more of our neighbor's needs, manage access and egress efficiently, and provide a much larger selection of products. We like the concept of it being employee owned and we witness the dedication to service to patrons each time we shop there.

Thank you for counting this in the "Pro" column for the moved and improved Holiday Market.

Best regards,

Bonnie Field
19139 Jayhawk Drive
Penn Valley

From: [Steven Kuester](#)
To: [Steve Geiger](#)
Subject: Holiday market
Date: Thursday, November 20, 2025 9:07:19 AM

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Steve,

I totally support the plan for Holiday Market's move to new location in Penn Valley.

Steven Kuester
skuester1@gmail.com

From: Cheri
To: Steve Geiger
Subject: Holiday's new market in Penn Valley
Date: Thursday, November 20, 2025 10:29:38 AM

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Yes, yes, yes. It's golf cart people probably making the worst of the complaints. Maybe ensure we can get a listing of all the complaints to date, and ask for any other complaints....then give a detailed reason those complaints can easily be fixed. Then do an open poll that will be sent to all homeowners. Board Meetings don't catch most of the owners. A well planned poll that goes in Wildwood News, and ebits, that we all see will give you a more honest version of how many people really want a good version of Holiday Market so close to us. I've already sent my long opinion on NextDoor. But I am all in for this to work out! Thanks for the representation Steve.

Sent from my iPad
Cheri Merrifield
(512) 897-8022
charingm@comcast.net

From: [Nancy Guenther](#)
To: [Steve Geiger](#)
Subject: New Holiday Market
Date: Thursday, November 20, 2025 11:34:57 AM

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Dear Mr Geiger:

My husband and I have lived in LWW for 17 years and I do a lot of shopping at Holiday Market but by virtue of its size, it lacks a lot of items that makes it necessary to drive up the hill to shop in Grass Valley about once a week or so.

We both support Holiday's plans to build a new store, but we have significant concerns about safely entering and exiting Commercial Avenue from Pleasant Valley Road, especially during high traffic times of the day. It is already dangerous to pick up a pizza for dinner at Players Pizza as there is so much traffic coming from the left (south) that time of the day as you exit. At first, I thought a traffic light would be the answer, but worry about that creating traffic backing up onto Hwy 20 as Commercial Avenue is so close to Hwy 20.

Register us as two Lake Wildwood residents in favor but concerned about safety and traffic flow. I look forward to the meeting on December 2nd to find out more.

Nancy and Ross Guenther
19798 Explorer Dr
Penn Valley, CA 95946

From: [Ali Gencarelle](#)
To: [Steve Geiger](#)
Subject: Holiday Market - In favor of move
Date: Thursday, November 20, 2025 11:51:06 AM

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Good Day-

I am writing in support of the Holiday Market moving to its new location in Penn Valley. As a resident and homeowner, my view is the new larger location will be advantageous to the whole community. I realize it may be a nuisance to those who like to drive their golf carts to the store, but they should not be put ahead of the community at large. It's a small inconvenience, unless your drinking alcohol... I also have seen the store have to put up cones several times to keep the golf carts from parking in walkways etc, and one golf cart driver simply removed the cones and parked in the illegal spot anyway.

Good luck pleasing the masses on this one, please let me know if there is any further action I might take in support of the move.

All the best-
Ali Gencarelle
10718 Willow Lane
Penn Valley, CA 95946
916.337.7521

From: [Susan Rappaport](#)
To: [Steve Geiger](#)
Subject: New Holiday Market
Date: Thursday, November 20, 2025 12:48:34 PM

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I would love to have the new Holiday Market proposed to be built off Commercial Avenue in Penn Valley.

I live in the Wildwood Ridge Development, just north of the Lake Wildwood Development.

I have no idea why the Lake Wildwood Association would oppose driving just a few minutes longer to get to an enlarged Holiday Market.

Please do what you can to get the larger Holiday Market plans approved.

Thank you,

Susan Rappaport
13305 Gold Court
Penn Valley, Ca. 95946

From: [Constance LaTrelle](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Thursday, November 20, 2025 3:05:24 PM

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I am a resident of Penn Valley. I am contacting you in support of the proposed Holiday Market in Penn Valley. It will be nice to have a big store here in Penn Valley.

Constance LaTrelle

From: [Len Stevens](#)
To: [Steve Geiger](#)
Subject: PV Holiday Market
Date: Thursday, November 20, 2025 3:53:37 PM

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Hi Steve,

Just a short note in support of the proposed new Holiday market in Penn Valley at its new location, I believe it will be a great and beneficial improvement to our community.

Thanks

Len Stevens

Len Stevens
President
Len Stevens Construction, Inc.
len@lenstevensconstruction.com
www.lenstevensconstruction.com
Cell: 530-913-3589 / Office: 530-432-3643

From: [Colin Irwin](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Thursday, November 20, 2025 6:55:14 PM

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This is in regards to the proposed new Holiday Market in Penn valley. We recently learned that some complaints have been registered from Lake Wildwood residents about this new store.

We live in Penn Valley, though not in Lake Wildwood and a larger market with a better selection of products is a win/win to us. The new Penn Valley location is going to be similar to The Holiday Market store in Lake of the Pines and it is always a nice place to shop, when I head south and get down there. My guess is that it will be inconvenient to some of those Lake Wildwood residents since they won't be able to drive their golf carts to the new store as they do now. That seems very petty and not a reason to hold up this new market which we see as a benefit for the larger Penn Valley community.

Colin Irwin
David Schiffelbein

From: [Kiso Cannon](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Thursday, November 20, 2025 7:08:45 PM

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Dear Steve Geiger & Planning and Development Team,

I am writing to express my strong support for the establishment of a new Holiday Market location in Penn Valley. As a local resident, I have closely followed the discussions and assessments regarding this project and am pleased with the updated traffic count results, which affirm the viability of the original traffic management plan.

The introduction of the new Holiday Market location to our community is a promising development that promises not only to enhance our local shopping experience but also to invigorate the surrounding small businesses along Highway 20. The increased foot traffic resulting from the market's presence can lead to a significant boost in patronage for these businesses, thus contributing positively to our local economy.

I am confident that with thoughtful planning and execution, the new Holiday Market location will seamlessly integrate into our community, offering convenience and growth opportunities while maintaining the quality of life we cherish. I urge you to consider the many benefits this project brings and look forward to seeing it come to fruition.

Thank you for considering my support.

Sincerely,
Kiso Cannon

From: [Charles Carroll](#)
To: [Steve Geiger](#)
Subject: Holiday Facility
Date: Friday, November 21, 2025 9:31:04 AM

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Mr. Geiger,

I have lived in Lake Wildwood over 30 years, and have shopped at Holiday regularly.

While I understand neighbors' concern about traffic, I believe the benefit of a larger, Holiday with more features would outweigh the predicted problem.

Good jobs are badly needed in our area, and I believe that too many obstacles are presented to those attempting to improve service and employment through their business plans.

I support the proposed Holiday Market.

Charles "Chuck" Carroll

Penn Valley

From: [Ken Rohrbach](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Friday, November 21, 2025 10:47:57 AM

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Mr Geiger, My name is Ken Rohrbach and I have lived in LWW since 1987. I want to express my support to Holiday Market and their need to relocate. That folks would try to prevent that so they can drive a golf cart to the market is selfish and thoughtless.

Please support the market;s choice and help expedite the journey through red tape.

Thank you
Ken Rohrbach
18507 songSparrow ct
Penn Valley, Ca 95946

From: gbmcdermott
To: Steve Geiger
Subject: Holiday Market Move
Date: Friday, November 21, 2025 11:04:27 AM

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Mr. Geiger,

As long time Lake Wildwood residents, we are quite concerned with the lack of analysis associated with the Holiday Market move to the rt. 20 and Pleasant Valley Rd. intersection. Holiday market is so important to our community, and there needs to be more study on the pedestrian and traffic flow... and probably some additional turn lanes installed to get the project done correctly. More due diligence is needed, as this change will affect thousands of people and families.

Thank you,

Bruce and Lynn McDermott

From: jansway@comcast.net
To: [Steve Geiger](#)
Subject: Holiday Market in Penn Valley, CA
Date: Friday, November 21, 2025 11:48:49 AM

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Dear Steve,

I am 100% for the new Holiday Market to be built. I have lived in LWW for 19 years and it's time for some long needed changes.

Wayne Siegfried (my husband) wants the new store too. He misses a Deli!

Thank you.

Janis & Wayne Siegfried

19115 Chaparral Drive

Penn Valley, CA 95946

Cell 408-499-4954

Sent from my iPhone

From: Geni Whitehouse
To: Steve Geiger
Subject: Support for New Holiday market
Date: Friday, November 21, 2025 2:26:23 PM

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Steve,

Please approve this much needed improvement in Penn Valley shopping options!

I am a resident of Lake Wildwood and would love to see this happen,

Geni

Geni Whitehouse

<https://linkprotect.cudasvc.com/url?>

[a=https%3a%2f%2fwww.geniwhitehouse.com&c=E,1,hrsFjJh3wJhPPolZaDVmtlCunSmKsh-BE68uh6q5BUnu5p3RRlhTa687_WhF9hoAUG3kEIfHUK8pahIRre1CjKn_vzeiGBt3haBp{kFZ4w.,&typo=19252021980](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.geniwhitehouse.com&c=E,1,hrsFjJh3wJhPPolZaDVmtlCunSmKsh-BE68uh6q5BUnu5p3RRlhTa687_WhF9hoAUG3kEIfHUK8pahIRre1CjKn_vzeiGBt3haBp{kFZ4w.,&typo=19252021980)

@evenanerd

From: [John Favetti](#)
To: [Jodeana Patterson](#)
Cc: [Steve Geiger](#)
Subject: Re: FW: Notice of Public Hearing (for special PC 12/2/25 meeting): Penn Valley Holiday Market (PLN24-0089; GPA24-0003; RZN24-0003; DVP24-2; MGT24-0011; EIS24-0007)
Date: Friday, November 21, 2025 2:28:40 PM
Attachments: [image001.png](#)

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Please do not succumb to LWW objection to this. They do not speak for everyone in LWW.

On Fri, Nov 21, 2025 at 11:21 AM Jodeana Patterson
<Jodeana.Patterson@nevadacountyca.gov> wrote:

Good morning,

Please see the attached Notice of Public Hearing for a *special meeting* of the Planning Commission on Tuesday, December 2, at 1:30 p.m. for a General Plan Amendment and Zoning District Map Amendment (Rezone), Development Permit, and Management Plan to allow for the development and operation of a 30,711-square-foot grocery store located at 18805 and 18807 Pine Shadows Lane, Penn Valley, CA, for your review and comment.

For comments and questions, please contact Senior Planner Steve Geiger at (530) 265-1236 or steve.geiger@nevadacountyca.gov.

Respectfully,

Jodeana Patterson

Administrative Assistant II

Clerk to the Planning Commission

Clerk to the Zoning Administrator

From: [Sandi Weyand](#)
To: [Steve Geiger](#)
Subject: Penn valley holiday market
Date: Saturday, November 22, 2025 10:35:08 AM

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Dear Mr. Geiger:

I am writing this message in support of Holiday Market. Penn Valley continues to grow and we need a larger store. The people in Lake Wild Wood seem to think the market belongs to them. They are wrong, just selfish as they won't be able to drive their golf carts to the new store. I live in LWW and I totally support the new store.

From: [Jeremy Hale](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Sunday, November 23, 2025 7:52:05 AM

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Dear Steve,

I am writing in support of the Holiday Market Pleasant Valley Rd project in the hopes that the county planning department will not delay in approving this important and beneficial local business and community asset.

This is exactly the kind of project the county should be trying to expedite as it brings so many benefits to the community.

Thank you for the work that you do sir.

Sincerely,

Jeremy Hale

From: [Mark Danckert](#)
To: [Steve Geiger](#)
Subject: New Holiday Store / Lake Wildwood
Date: Sunday, November 23, 2025 3:43:36 PM

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Hi Steve,

My wife and I have been Lake Wildwood residents for over a decade and missed the recent meeting on the topic of the new Holiday store over by Players.

I don't understand why anyone would be opposed - a beautiful new store with everything we need to avoid the drive to Grass Valley seems like a great idea. Only downside is not being able to drive a golf cart for those who own them. Just curious if you'd be willing to point me in the right direction for information.

What's the score on this - is it game over, just delayed or is there a tight margin? My neighbor is a previous board member so I can get some information from him, but the existing store has a flyer with your contact info so I thought I'd start with you.

I'm willing to become active on the issue but need a better understanding of the opposition and obstacles. Any information or guidance would be greatly appreciated.

Best regards,

Mark Danckert
Danckertm@gmail.com
1.925.918.0400

From: [dave watt](#)
To: [Steve Geiger](#)
Subject: Holiday market
Date: Monday, November 24, 2025 6:47:41 AM

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Good morning..I am responding to the rude manager brought in to our local holiday checkout group. Not only did he not respect my opinion about moving our neighborhood store, he belittled me for being selfish by wanting to keep the current location. He claims we should be in favor of the move for the good of all folks in area. I am against the move and feel insulted by the offer from Holiday (\$300,000) to pay the county towards approval. The current location is accessible using a golf cart and should be kept open, at least an adequate satellite site

Sincerely
Dave Watt
Longtime Lake Wildwood resident

From: Paulette Snyders
To: Steve Geiger
Subject: Proposed Penn Valley Holiday Market
Date: Monday, November 24, 2025 9:41:43 AM

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Steve

As a current resident of Penn Valley since 1999 (26 years), 12 of those years in Lake Wildwood, I am very excited about the new site/Holiday Market expansion.

Lake Wildwood is not the only population of the area that uses Holiday Market and the planning department needs evaluate the entire area not just one area (and the ability to drive a golf cart to the store).

The current Holiday market has served the community well. When I moved here the market was very tiny - ended at the current entry door with a restaurant next door that eventually closed and they did small expansion into that space. They carried the basics but any "big shopping" took me to Grass Valley to shop - more gas, more time, more pollution etc. And the limited space for delivery trucks is a hazard to those driving into the store parking lot.

There is no room in the current location for expansion. The new location is about a mile from current location (much less than 10 miles to Grass Valley), will provide more parking, expanded grocery selection and much less distance to drive for "big"grocery" shopping. I have been to the new store at Combie Road and was amazed at the size and selection it provided.

Paulette Snyders
Sent from my iPhone

From: [Tom Drummond](#)
To: [Steve Geiger](#)
Subject: Holiday market application new store , Penn valley - hwy 20 intersection
Date: Monday, November 24, 2025 12:19:47 PM

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Sir,

My hope is that the transportation department will follow all the guidelines for space requirements for the spacing of traffic lights and will not cut corners to assist the holiday market for approval of their new store front..

Also Caltrans should have a lot to say as traffic will backup on the highway and across the street to Penn Valley Drive.

The ingress from the Wildwood Mini Storage that grade has to be lower than 20%..

The holiday market store needs to find ingress thru Hwy 20 along the frontage road east of the light at Hwy 20 a Pleasant Valley Road.

The traffic at the intersection is going to be a mess. Effect ingress and egress on our daily lives. Please do your job, follow the guidelines, so the community can have a safe intersection..

Thank you

Thomas Drummond
Resident since 1972

Make it a Prosperous Day,

Thomas F. Drummond

*Network Real Estate
22262 Pleasant Valley Rd.
Penn Valley, CA 95946*

c:(530) 575-6006
o:(530) 432-8885
f: (530) 272-8703
DRE# 00852272

From: [Gay Vail](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Monday, November 24, 2025 12:31:58 PM

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Greetings,

We have lived in Lake Wildwood for 5 years & love having the convenience of Holiday Market being so close. However, we understand that the new Holiday Market will be a vast improvement in many ways.

We are in support of this project & are excited for the new larger location!

With gratitude,

Stan & Gay Vail
12755 Roadrunner Drive
Penn Valley, CA 95946

Sent from my iPhone

From: [Lynda Murphy](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Monday, November 24, 2025 1:16:38 PM

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Nevada County Planning Department,
Steve Geiger

I love Holiday Market. For years I frequented Holiday in Chester, CA visiting friends at Lake Almanor. Fourteen years ago, we moved to Lake Wildwood where I am a frequent shopper at Holiday. I am delighted with the service, the produce, meat selection, and the amount of product packed in our little store - it has expanded once since we moved here.

I was disappointed I could not attend the Holiday Market Lake Wildwood presentation you had here due to illness. I was unaware that the Lake Wildwood Association is encouraging its members to protest this project. I will be looking into this. I served on the public relations committee when I first moved to LWWA helping build public relations with Grass Valley and Nevada City joining the Chambers of both and developing a Lake Wildwood Brochure.

My suggestion for Holiday is to hire a Greyhound Bus and take those who are protesting to Holiday Market Lake of the Pines. I believe most who are in opposition are ignorant of the benefits of having a full-service store nearby. I am looking forward to the full-service Deli and Bakery. As I am getting older I will use the convenience of the store. Yes, I will be disappointed that I will drive a few more minutes, but the benefits outweigh the current convenience. I'd gladly be a spokesperson if you need one.

Sincerely,

Lynda Murphy
18159 Jayhawk Drive
PV, CA 95946

Lynda ~ [H 530-460-1921 C & Text -530-388-0695](tel:5304601921)

From: [Julie Moore](#)
To: [Steve Geiger](#)
Subject: Holiday Market Support
Date: Monday, November 24, 2025 2:14:51 PM

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Hi Steve,

I live in Lake Wildwood and I think expanding the Holiday Market in the new location is a great idea. The current Holiday Market is too small to carry all the items we need, so many of us travel to Grass Valley to go to larger stores. A larger market would solve many problems and be a nice addition to the area.

Alternatively, I think the owner of the building they are currently in is out of his/her mind for not letting them expand there. Nobody eats at that tiny restaurant next door. I say give 'em the boot.

Growth is inevitable. Holiday sounds like they have planned well and are generously considering the neighborhood roads.

Best regards,
Julie Moore
juliemooredesign.com
650-793-2225

From: [Naia Hall](#)
To: [Planning](#); [Steve Geiger](#)
Subject: Regarding the Holiday Market Project :PLN24-0089; GPA24-0003; RZN24-0003; DVP24-2; MGT24-0011; EIS24-0007
Date: Monday, November 24, 2025 2:27:40 PM

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Dear Planning Department,

Has a comprehensive traffic study been conducted for this project? I live at the end of Pine Shadows Lane and will be bordering the store property. I am very concerned that the increase in traffic on Pine Shadows and Commercial Street could create a serious traffic hazard. Is there a plan for a 4-way stop or roundabout at Pine Shadows to keep traffic moving safely? During peak hours in the morning and evening, it is extremely difficult to turn left onto Pleasant Valley Road from Pine Shadows and Commercial Streets toward Hwy 20. Making the left turn into Pine Shadows and Commercial from Pleasant Valley Drive is also difficult, not to mention the potential increase in backups on Hwy 20 when turning right onto Pleasant Valley heading toward Lake Wildwood. How will these issues be addressed?

Additionally, I am concerned about privacy, noise and light pollution, as well as the security of the properties bordering the area due to increased vehicle and foot traffic. What visual and spacial buffer will there be between the properties to ensure privacy and security?

Thank you,

Naia Hall

Naia Hall
Cell: +1 530-362-2201
Tahiti: +689.87.20.99.62
naia19@mac.com

From: [Rene Randall](#)
To: [Steve Geiger](#)
Subject: Penn Valley Holiday Market move
Date: Monday, November 24, 2025 4:26:18 PM

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Hi Steve, my husband and I have lived in LWW for over 25 yrs and want you to know we have complete support for the PV Holiday to make this wonderful move just down Pleasant Valley Drive. Most neighbors I've spoken to agree. I think the only ones worried about the move are those that drive golf carts to the market. We all need to look at the bigger picture. The new store will offer so much more and allow the employee owned store to grow. It will also bring more quality shopping to all of Penn Valley. Not everyone lives in LWW! I think it's selfish to not consider the advantages to more residents by moving it up the road and expanding. Feel free to count my vote for the new location! Thanks Rene Randall



Rene Randall

Senior Loan Officer | NMLS #328955

Direct: 530.913.6793 | Office: 530.271.1850

rene.randall@apmortgage.com

10138 Commercial Ave, #100 Penn Valley, CA 95946



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From: [Nancy Shaw](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Monday, November 24, 2025 4:37:25 PM

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Hi Steve,

My husband and I are appalled at the entitled and misguided behavior of the Lake Wildwood Association in regard to the change of location for a new and improved Holiday Market. They do not represent the Penn Valley community at large, but rather they are a privileged few with loud voices looking after their own interests.

I look forward to driving 2 minutes out of my way to a brand-new Holiday Market with more services and product selection.

Can you email me a copy of the letter I picked up at the Holiday Market regarding this issue along with your email? I would like to send it to all my friends and neighbors in the community. I have spoken to a number of them who shop at Holiday and none are opposed to the expansion plans. In fact, like me, quite the opposite.

Please put me down for the record as supporting Holiday's new location and expansion plans. My husband is sending his support in a separate email.

Hoping for a speedy resolution in favor of the expansion.

Happy holidays,

Nancy Shaw
13782 Gold Country Dr.
Penn Valley, CA 95946

From: [Larry Strauss](#)
To: [Steve Geiger](#)
Subject: Penn Valley Holiday Market
Date: Monday, November 24, 2025 8:49:19 PM

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Dear Steve,

While I was disappointed that Holiday Market was not able to close the deal to expand at the current location, I strongly support the move up Pleasant Valley Road. Had our community boycotted the restaurant standing in the way of expansion at the current location with the zeal some are applying to the new Holiday Market, perhaps we would not be where we are today. I support Holiday Market's efforts to improve the shopping experience in our Penn Valley community. I trust Holiday Market and the county will create appropriate infrastructure to manage possible traffic issues should any arise.



Larry Strauss
415.851.1978

Catch & release, artificial bait, single barbless hooks.

From: [Cynthia Turner](#)
To: [Steve Geiger](#)
Subject: New Proposed Holiday Market for Penn Valley
Date: Tuesday, November 25, 2025 9:11:39 AM

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Dear Mr. Geiger

I'm sending you this email because I just found out that Lake Wildwood Association is encouraging everyone to protest the project of the new store and it's location.

Lets start by saying LWVA are a bunch of snobs. A lot or most people that live there are always complaining about one thing or the other. They feel entitled because they live in a beautiful gated community, which has golf cart access to the current Holiday Market. How nice that must be and what a shame if they have to actually get in their cars and drive to the store like the rest of us. And they would have to drive further to the store like the rest of us have to do now. Perhaps they should form their own town and disconnect from Penn Valley where us humble folks live.

From what I've read, Holiday has put in time and thousands of dollars to comply and work out ways to make everyone happy, not just LWW. We need a bigger store, so we don't have to drive to Grass Valley as often just to shop for groceries. It sounds like they have everything figured out, except how to please the LWVA. They are not the only ones who live in the area so they shouldn't be the deciding factor.

I hope enough people step forward so that we get a nicer, newer store. Otherwise, if I were Holiday, I'd close the store and open somewhere else like maybe Smartsville. I'm sure the residents of Smartsville would be grateful for a grocery store.

Thank you for your time,

Cynthia Turner
Penn Valley Resident FOR the new store location

From: [NANCY BALDWIN](#)
To: [Steve Geiger](#)
Subject: Penn Valley Holiday Market
Date: Tuesday, November 25, 2025 9:26:00 AM

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Hello Steve -

I understand this might be past a deadline for submitting comments, but still wanted to provide our thoughts on the new Penn Valley Holiday Market and lack of traffic mitigation. My husband and myself attended the Lake Wildwood Town Hall meeting and found the traffic mitigation proposal unacceptable for a number of reasons:

A traffic report being used from pandemic years is unacceptable. A lot has changed in the last 4-5 years and it is prudent that we all keep this in mind while planning for updates to our lovely community.

I personally didn't leave the community during the pandemic - as there was no where to go. I moved here, worked from home and rarely left the LWW gate. Since then, I'm in and out of the community on a daily basis. Again, a lot has changed in 4-5 years since that report was conducted.

While we understand change is inevitable and this is an expensive undertaking for the Holiday Market, we, and I mean all of us, must find it in our heart and soul to do the right thing and keep our little gem of a community "small" without destroying the home-town charm and providing safe and sound updates. We know more traffic is inevitable - with or without a new market. It's just the way it is. Again, while this is an expensive undertaking for the Holiday Market, it's necessary for all of their customers to feel safe and easily access and depart the market. It's part of the responsibility that come with change and growth!

A new study must be performed in order to satisfy the influx of traffic that will be occur to the current bottleneck of Pleasant Valley Road and Highway 20.

Thank you for your time and consideration.

Kind Regards,

Nancy and Bob Baldwin

From: [Kalina Watanabe](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Tuesday, November 25, 2025 9:47:25 AM

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Dear sir,

I would like to address the proposed building of a new Holiday Market. The Lake Wildwood Association and a majority of residents of Lake Wildwood don't want the store to move because then they would have to drive like normal people to go to the store instead of illegally driving their golf carts across the road and taking up parking spaces. It would be more of an inconvenience to them to have to drive further. The rest of us have to do that anytime we need to go to the store or we go to Grass Valley. I think the new store and its location would be a wonderful idea. And it sounds like the store has already jumped through hoops, paid a ton of money and agreed to help with future highway improvement costs so why not allow them to move? The people of Lake Wildwood act like they own the area, and are very spoiled and snobby and their opinions shouldn't outweigh the opinions of the rest of Penn Valley and surrounding areas that shop at that market.

Put it to a vote to be fair if you can't decide to do the right thing on your own. I'm sure more people want this move than those that do not.

Thank you
Kalina Watanabe

From: WILLIAM FLOYD
To: Steve Geiger
Subject: Re: PLN24-0089; GPA24-0003; RZN24-0003; DVP24-2; MGT24-0011; EIS24-0007 (Proposed New Holiday Market)
Date: Tuesday, November 25, 2025 10:09:41 AM

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Thank you for your response, Mr. Geiger. We support the plan as proposed.
Bill and Diane Floyd
Lake Wildwood

> On Nov 25, 2025, at 10:00 AM, Steve Geiger <Steve.Geiger@nevadacountyca.gov> wrote:
>
> Good morning,
>
> In answer to your comments/question below, the project was circulated to the Penn Valley Fire Protection District, County Fire Marshal's office, and other interested County departments. No concerns including potential impacts to evacuation routes have been expressed.
>
> Steve Geiger
> Senior Planner
>
>
> Planning Department
> 950 Maidu Ave. Suite 170
> PO Box 599002, Nevada City, CA 95959-7902
> Main (530) 265-1222 Direct (530)265-1236
>
>
>
> -----Original Message-----
> From: WILLIAM FLOYD <Wwalton2@aol.com>
> Sent: Thursday, November 6, 2025 5:47 PM
> To: Steve Geiger <Steve.Geiger@nevadacountyca.gov>
> Subject: PLN24-0089; GPA24-0003; RZN24-0003; DVP24-2; MGT24-0011; EIS24-0007 (Proposed New Holiday Market)
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>
> Dear Mr. Geiger:
> This is in regards to the subject referenced above. As long time Lake Wildwood residents, we are leaning towards

endorsing the building of the new Holiday Market off of Pleasant Valley Dr., with or without further traffic mitigation measures. In our view, the benefits of this proposed project likely outweigh any potential consequences. But, before we commit our support on the record, we would like to know if the plan, as currently proposed, has been reviewed by the Penn Valley Fire District, the Nevada County Sheriff's Office, and the County's Emergency Services Dept? If so, what position have they taken?

> Please advise.

> Thank you.

> Bill and Diane Floyd

> Lake Wildwood

From: [Tom Watson](#)
To: [Steve Geiger](#)
Subject: Holiday Market
Date: Tuesday, November 25, 2025 10:45:28 AM

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Wanted to let you know, I fully support the construction of the new Holiday Market.

Janet Watson
L.WW resident
Sent from my iPhone

From: [Terrance Logue](#)
To: [Steve Gelger](#)
Subject: Holiday Market Penn Valley
Date: Tuesday, November 25, 2025 12:54:44 PM

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I support the new Holiday Market Plan. Hoping you agree!

Fran Logue
14199 Sun Forest Dr, Penn Valley, CA 95946