

Attachment A

Settlement Agreement

SETTLEMENT AGREEMENT

This Settlement Agreement is made by and between Justin Sheaff, Mountain Addiction LLC (collectively, the “Settling Parties”), and the Tahoe Regional Planning Agency (“TRPA”). This Settlement Agreement represents the full and complete compromise and settlement of certain violations alleged by TRPA, as described below:

In February 2020, the TRPA inspected the California Tahoe Conservancy Property located off of Country Club Road, Tahoe City, CA, Assessor’s Parcel Number 092-010-021 (“Tahoe Conservancy Property”) and found that the following violations of the TRPA Code of Ordinances had occurred:

- Unauthorized tree removal of 5 trees larger than 14 inches DBH in violation of TRPA Code Section 61.1.5 (requiring TRPA approval for removal of all trees greater than 14 inches DBH) and Section 2.3.2.M (the tree removal is a non-exempt project and must be reviewed by TRPA). *5 trees greater than 14 inches dbh were removed without approval along a trail system used for snow cat and snowmobile access by Justin Sheaff located on the California Conservancy Property. No permits were issued by any applicable agencies for the removal of the 5 live trees larger than 14 inches dbh.*

Justin Sheaff and Mountain Addiction LLC. have both denied any responsibility for the violations alleged, but are willing to enter into this Agreement as a compromise of all claims by TRPA. This Settlement Agreement is conditioned upon approval by the TRPA Governing Board. Execution of the Agreement prior to Board action shall not be binding on either party if the Governing Board does not authorize settlement on the terms set forth below:

To fully resolve the matter, the parties hereby agree as follows:

1. The Settling Parties shall pay TRPA \$20,000 within 30 days of Governing Board approval of this Settlement Agreement.
2. Within 10 days of receipt of the \$20,000 payment, the Settling Parties and TRPA agree to file a stipulated dismissal with prejudice in the matter *TRPA v. Mountain Addiction LLC, Justin Sheaff*, Case No. 2:20-cv-00945-TLN-KJN (E.D. Cal.), with each party bearing their own fees and costs.

The Settling Parties have read this Settlement Agreement and understand all of its terms. The Settling Parties have executed this Settlement Agreement after opportunity to review the terms with an attorney. The Settling Parties agree to comply with all applicable TRPA requirements.

Signed:

Justin Sheaff

Date

Mountain Addiction LLC

Date

Joanne S. Marchetta, Executive Director
Tahoe Regional Planning Agency

Date