December 12, 2011
Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89448

Dear Members of the Governing Board and TRPA Staff,

The League to Save Lake Tahoe appreciates the opportunity to respond to transportation responses presented in the Governing Board Packet, as well as attachments to the Packet in regards to tourist accommodation units (TAUs), air quality, and greenhouse gases.

The League to Save Lake Tahoe submitted comments regarding transportation and the HMR FEIS in October 2011. The staff packet responds to these comments stating they the League's concerns are "inaccurate and baseless." The staff responses, however, do not refute the well-grounded and accurate arguments provided in the October 2011 letter.
The responses to the responses are listed below:

1) The League continues to assert that traffic volumes should have been performed on Saturday. The League spoke with TRPA staff this fall and asked what other projects followed the Homewood model and studied traffic volumes for Friday instead of Saturday. Staff had no off hand knowledge of any projects that use Friday. So far TRPA staff, consultants, and the developer have failed to provide examples of other projects like Homewood that have not studied Saturday Traffic.
2) The responders still have not alleviated the concern that traffic counts for winter were never performed at Homewood. Instead traffic numbers for Homewood were estimated based of off traffic counts around other parts of the Lake including Highways 89 and 28. The study failed to count numbers at Homewood and only extrapolated from other traffic counts.
3) The EIS states that the winter traffic counts were performed by a consultant. The response letter states that it was performed by the Placer County. If this is true than the EIS needs to be corrected. The EIS currently states, "counts were collected by a **sub-consultant hired by Hauge Brueck Associates**."
4) The response letter provides no evidence regarding why 12 PM to 3PM on a summer Saturday at Homewood will be have a greater traffic volume than 3PM to 6 PM on a Saturday at Homewood. The concern still remains that the EIS has not adequately addressed the time of highest volume for traffic at Homewood during the summer.
5) The League raises concerns about how assumptions were made regarding when guests will arrive at the resorts. The responders do not comment on the assumptions for arrivals, but rather comment on assumptions for departures. There is still a concern that the assumptions used to determine arrival percentage are incorrect and unfounded.

6) The League remains concerned that the trip length was derived using averages for the whole Basin and is not specific to the West Shore.
7) The League still remains concerned about the assumptions that only 25% will leave the ski resort. The response claims that this number was derived from studying an undisclosed North Shore resort in which 43% of guests left in their stay. The response still remains in adequate in detailing how 25% was derived. The concern is that the traffic study underestimated the number of guests that will leave the resort to ski at other areas.
8) In regards to enforcing the alternative transportation plan the response to comments states that Placer County and the TRPA are "not required to speculate what might occur if the Plan is not followed in 10 years…." Ten years is not the distant future and it is still a concern that it is unclear how the plan will be enforced in ten years if the Plan is not being followed.
9) In regards to construction trips the response states that daily construction trips will total 192 trips which is 8 trips under the 200 trip significance range. However, this is a very small margin of error. The 192 numbers are based on using extremely large 20 cubic yard dump trucks. If during construction, the plan switches to a dump truck of 10 cubic yards the daily trips from construction will increase above the 200 trip significant increase number.

There are two memorandums attached to the board packet regarding the transfer of TAUs and ERUs in relation to VMT, air quality and greenhouse gases. The memo is not part of the EIS/EIR and the numbers in the EIS/EIR still remain as presented.

The memo attempts to claim that there will be an improvement to the air quality and greenhouse gases on a regional basis because of the retirement of TAUs and ERUs in the North Stateline Casino Corridor. However, there is actually an increase in regional emission's because many of the sending TAUs and ERUs from the Tahoe Inn site are not in operation and therefore currently do not produce emissions. The memo assigns the same number of daily trips to units that are in use and units that are already banked. There is no decrease from the sending site in air quality emissions and greenhouse gases based on existing conditions in which a number of the units are currently not in use and therefore the memo is flawed in regards to this matter. Furthermore, there will be an overall increase because there is an overall morphing of TAUs, conversion of TAUs to large ERUs, and the additional of bonus units that currently do not exist anywhere in the Basin. The memo does not take into the account the increase in the number of bedrooms that occurs due to morphing, but rather treats one unit as producing the same emissions regardless of number of bedrooms. Overall there is an increase in emissions on a regional basis. Additionally, TRPA and the EIS always examine local impacts experienced at the receiving area. CEQA and NEPA require the EIS/EIR to examine the local impacts of the project. According to the EIS/EIR, there are emissions impacts from this project that still remain significant and unavoidable.

Thank you,

Nicole Gergans
League to Save Lake Tahoe
Environmental Program Advocate