



The League to Save Lake Tahoe

March 18, 2008

Re: Cumulative Impacts of Proposed Tahoe Vista and the Kings Beach/Crystal Bay CEP Projects

The League to Save Lake Tahoe appreciates the opportunity to provide comments regarding the cumulative impacts of the proposed Tahoe Vista and the Kings Beach/Crystal Bay CEP Projects.

In North Lake Tahoe, there are 15 different projects planned for a four mile radius of land in Placer and Washoe Counties. Nine of these projects (including the Sandy Beach Campground and proposed site for the Tahoe Vista Partners development) are within a one square mile radius of Tahoe Vista. The remaining six projects have received a reservation of commodities as part of the Community Enhancement Program (CEP) and are located within the adjoining communities of Kings Beach and Crystal Bay (including the Boulder Bay Redevelopment on the Biltmore site.) As these projects are concentrated within a relatively small area, a cumulative impact study for *all of the projects in unison* is needed which addresses the effects on traffic, VMT, coverage, soil conservation, water quality, air quality, vegetation, noise, and public service infrastructure.

The following chart provides a comparison of the existing conditions with the proposed construction specifically on these 15 different sites. (Figures are approximate and are based on information collected from prospectuses and project overviews for each of the projects.)

Condition	Existing	Proposed	% Change
Coverage	541,235 ft ²	1,414,737 ft ²	161%
Residential Units	140 units	786 units	461%
Tourist Accommodation Units (TAU)	323 units	532 units	65%
Commercial Floor Area (CFA)	42,221 ft ²	170,907 ft ²	305%
Parking Spaces	672 spaces	1,675 spaces	149%
Recreational Vehicle Sites	10 sites	0 sites	-100%
Mobile Home Units	2 units	0 units	-100%

These figures highlight the scale of the development associated with these projects in the small area of the adjoined communities of Tahoe Vista, Kings Beach and Crystal Bay. As evidenced above, there would be substantial increases in coverage, residential units, commercial floor area, and parking spaces. The thresholds that the agencies in the Lake Tahoe Basin are struggling to attain and maintain could be adversely impacted during the construction phase and afterwards when the projects are fully functional.

Measures are being taken to mitigate the environmental impacts of each project, but only on an individual basis and in some cases only with a mitigation fee (which will be unable to resolve the impacts of far more vehicles utilizing the local roads, for example). However, the cumulative

impacts of these projects have the capacity to be greater than the sum of their parts. The issues that may have been apparently mitigated when they pertained individually to only one project might now cause more traffic, VMT, and other environmental impacts on a cumulative basis. A comprehensive cumulative impact analysis for all 15 projects would likely demonstrate that the current mitigations are either inadequate or mitigations will not be possible to resolve the sum of the impacts.

Land Coverage

As the table above illustrates, there is an estimated 161% increase in land coverage proposed by the Tahoe Vista, Kings Beach and Crystal Bay development projects, raising coverage from 541,235 ft² to 1,414,737 ft². With over 32 acres of land affected by the proposed construction of Tahoe Vista, Kings Beach and Crystal Bay, the projects could have detrimental effects on soil quality, vegetation, water quality, and wildlife.

An increase in coverage translates to less land area available for current naturally-occurring biochemical and hydrologic processes.

As there is a substantial amount of new impervious coverage proposed with all of these projects (approximately 873,502 ft²), soil quality could become degraded from compaction, loss of bioturbation, increased runoff, erosion and loss of vegetation, all due to an increase in impervious coverage. Increased coverage leads to a decrease in infiltration of precipitation and runoff which then leads to an increase in overland flow and sediment loading in to the watershed.

Consider the effects that just one project could have within this 4-mile span of project proposals. Sandy Beach currently has a 6.2 acre campground and is proposing conversion to a mixed-use property containing 45 tourist and 10 affordable housing units, garage structures, parking spaces, recreational areas, and over 4,500 ft² of commercial space. These numbers translate into approximately 60% land coverage and the removal of close to 200 trees. This one project alone will have significant impacts on the environment. Removing trees and brush will increase erosion and eliminate a significant portion of the naturally occurring water catchment and filtration systems that are currently in place. Runoff from paved surfaces and less infiltration of water into soil could allow nutrients and sediment loads to reach the tributaries leading to the lake. The estimated 299-522 net new daily trips that people will be taking in their vehicles will be permanent adjustments to the year-round traffic pattern in this relatively small area of North Shore. This will further exasperate traffic congestion and VMT related impacts throughout the year, instead of restricting those more limited effects during only the conventional campground season. As traffic increases, so will the amount of emissions that are being released into the atmosphere. These effects could be caused by only *one* of the proposed development projects.

Impervious land coverage will decrease the habitat of indigenous vegetative species. Information concerning the existing status of these lands and the uncommon and sensitive plant communities and late seral and old growth ecosystems is not readily available and needs to be studied.

Precipitation cannot infiltrate compacted soil or areas where vegetation has been removed. Tributaries collect overland flows that contain nutrients and sediment loads and release these waters into the littoral and pelagic zones of the Lake. Sediments and nutrients not only cloud and reduce the clarity of the lake, but also pollute the water. Polluted water contaminates fisheries and affects other wildlife species that rely on the area's water supply to survive.

The best management practices (BMPs) that are planned for construction and project implementation need to be analyzed to determine if the cumulative effects for all 15 projects have accounted for and fully mitigated the increased runoff, a decrease in vegetation, and associated water quality impacts.

Residential Units

Currently there are 140 residential units in these 15 project areas in Tahoe Vista, Kings Beach and Crystal Bay. Proposed development for these areas includes increasing residential units to 786 units which is a staggering increase of 461%. Air quality, traffic, noise levels, water quality and wildlife could be impacted by this dramatic increase in residential units in such a concentrated region.

Air quality will be impacted on account of an escalation of housing unit development and the increase of additional vehicles on the roadway. Pollutants such as ozone, particulate matter, nitrogen oxides and carbon monoxide will increase as a result of increased motor vehicle exhaust, emissions from electrical utilities, and residential wood burning. Threshold standards for carbon monoxide, ozone and particulate matter could be adversely affected by this cumulative development.

If each new residential unit proposed was associated with two cars, the amount of new vehicles frequenting this small 4 mile radial section of North Lake Tahoe would be in the order of 1,292, along with all the increased VMT impacts. With more vehicles grinding dirt and dust into fine particles, particulate matter could be transmitted into the air or into the waterways via overland flow. The substantial increase in VMT could conflict with both threshold standards and TMDL goals. With all the new vehicles in this four-mile corridor, daily traffic issues could be greatly worsened. During months of catastrophic fire risk, all the new vehicles from the newly proposed 646 residential units could jeopardize the safe evacuation of communities within this area and other adjoining communities. Greater emphasis needs to be applied to mass transit system improvements and other alternatives to the private automobile, consistent with the TRPA Compact, that alleviate these significant traffic and VMT effects.

As a result of the increase in vehicular traffic and higher level structures able to broadcast noise from balconies and decks greater distances, noise pollution would increase, with effects both on the community and wildlife. Although it is difficult to designate the degree at which various wildlife species and human individuals become significantly disturbed by noise levels, it is inevitable that louder noise corridors will be created along more heavily traveled roadways and where higher level structures are located. Wildlife could be further stressed as a result, in addition to the impacts from habitat loss. Community noise event threshold standards violations may also become more likely to occur.

An increase in residential units will create an increase in impervious land coverage and will have direct effects on runoff water quality. Runoff will carry nutrients and sediments into tributaries and potentially affect localized fish spawning and feed and cover habitat areas bordering these communities.

Parking Spaces and Tourist Accommodation Units

Current site conditions have 672 spaces for parking available. Proposed development includes plans to increase the amount of available parking within these 15 projects within Tahoe Vista, Kings Beach and Crystal Bay by 1,003 spaces, which corresponds to an increase of 149 %. The increase in parking spaces will have negative impacts on air quality, traffic, and increase coverage dedicated for parking and for use by vehicles which is one of the prime culprits for the source of fine sediments from urban areas according to the TMDL research.

An increase in parking spaces translates into a greater capacity for motor vehicles in these areas. Considering that most of the proposed TAUs are expanding from the equivalent of 300 ft² hotel-size units to large 2,000-3,000 ft² condo-sized units, it is expected that more parking spaces will be created to accommodate the people using these TAUs (and also visiting the more than 170,907 ft² of newly developed commercial space in the area.) Air quality will be impacted by the increase of motor vehicles, traffic, and greater energy requirements associated with the substantially larger TAUs.

Summary

By examining the cumulative impacts of all of these developments with the proper environmental documentation, it may be possible to prevent adverse long term effects by reducing scale of proposed development for impacts that cannot be mitigated and offering more substantial mitigations and monitoring when necessary. Before any more projects are considered, a cumulative impact study needs to be conducted to ensure that the North Shore is advancing in an environmentally responsible direction.

Thank you for your consideration of these comments. If you have any questions, please contact the undersigned.

Sincerely,

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Program Advocate
The League to Save Lake Tahoe