



League to Save Lake Tahoe

April 24, 2009

United States Forest Service
Lake Tahoe Basin Management Unit
35 College Drive
South Lake Tahoe, CA 96150

Re: Camp Richardson Resort Campground Project

Thank you for the opportunity to provide comments on the proposed Camp Richardson Resort Campground and Vehicle Circulation BMP Retrofit Project. The League to Save Lake Tahoe does support projects that incorporate above-and-beyond best management practices (BMPs) to reduce erosion and improve water quality throughout the Tahoe Basin. Nonetheless, there are significant concerns with the proposed campground redevelopment project.

Environmental Improvements

There is a need to bring the Campground Richardson Resort area, including the campground facilities, into compliance with Tahoe Regional Planning Agency environmental standards, including the protection and enhancement of water quality, vegetation, soils, and stream environment zones, all of which are impaired at the Resort.

The League supports the removal of coverage in SEZ's (i.e. Badger's Den campsites), but we do not support the creation of additional land coverage or development in sensitive classes of land (i.e. land capability classes 1a, 1b, 2, etc.) and areas of existing open space (i.e. North side of campground between the existing RV and Eagle's Nest campsite areas) that do not currently support permanent development and impervious coverage. These areas should be fully restored and protected to enhance water quality, vegetation, and wildlife habitat in the project area.

Year-round RV Camping Facilities

The League is concerned about the change to the currently seasonal campground operations to year-round operations of the RV facilities of the campground. We have the following questions and concerns as year round use has the potential to have immense environmental impacts including greatly increasing fine sediment to the Lake:

- *What will the full environmental impacts of operating a portion of the RV campground be during the winter, including impacts to TRPA environmental thresholds of water quality, air quality (i.e. increases in atmospheric deposition), and scenic quality due to the use of road*

traction materials to the campground roads and increasing vehicle use throughout the entire project area? Also what impacts will the project have on vehicle miles traveled (VMTs) in the Fallen Leaf Lake Management Area during the winter seasons?

- *A well known study on road dust emissions prepared by the Desert Research Institute (Zhu, et. al., 2007) concluded that wintertime road dust emission factors were on average 4 times greater than summertime emission factors due to the application of traction control material. The Forest Service needs to take into account that the operation of a year-round campground will dramatically increase wintertime emission factors for the entire Fallen Leaf Lake Management Unit, which will significantly increase impacts to both water and air quality. This is extremely imperative because of the campground's extremely close proximity to the Lake.*
- *Will there be onsite monitoring and evaluation of the environmental impacts associated with the operation of a portion of the campground during the winter season?*
- *How consistent is the year-round operation of a portion of the campground with the TMDL Clarity Challenge goals? What impacts will winter use have meeting the Clarity Challenge? What will be the contribution of fine sediment load from winter operations?*
- *If a portion of the campground is made available year-round will there be, in the future, a change to the restriction in prohibiting snow-mobile outfitter permits in the Fallen Leaf Lake Management Unit?*
- *Where will snow storage be located for winter operations of the campground? What will the environmental impacts be associated with that storage site, and will that location require full BMPs to protect water quality?*
- *What are the differences between environmental impacts caused from summer operations as opposed to winter operations?*

Retrofit of the Campground

The development and installation of campground water quality BMPs is needed, but the League has the following questions and concerns with the proposed project.

- The project proposes to reduce the number of campsites from 325 sites to up to 255, but the project proposes to increase the overall number of RV sites and making the campground year round. Overall, the project proposes to increase the number of utility hookup camp sites, which will have 60 foot long parking spurs, ultimately increasing the number of large RV's that the campground will be able to accommodate.
 - *Will the Forest Service provide an environmental analysis of the impacts associated with increasing the number of RV utility hookup sites, including impacts to TRPA environmental thresholds of water quality, vegetation, scenic, and air quality?*
 - *RV sites have a greater impact on the environment than tent sites due to the need for a larger impervious area needed to accommodate the RV on wider roads and longer and wider pads at the site. Plus additional impacts can occur from the hookups as well. What will be the impacts of one RV campsite compared to one tent campsite? For example, how does the impacts from one site compare to the impacts of X number of tent sites. What will*

be the contribution of an RV to VMTs, greenhouse gas emissions, and particulate matter be in comparison to a typical vehicle used in tent-camping (i.e. a 2006 Subaru Outback and/or 2006 Ford Explorer) in the Tahoe Basin? RVs are far more polluting for carbon dioxide and NOx, plus because they are heavier vehicles, they are more effective at grinding up particles on the road and contribute to higher amounts of fugitive road dust than the average automobile.

- *What will be the net environmental improvements, if any, that this project as proposed will have, including all of the needed analyses described throughout this comment letter?*
- *Does the LTBMU have a visitor carrying capacity for the management unit that the Resort falls into (Fallen Leaf Lake Management Unit)?*
- *What will the maximum length and type of RV that will be allowed to use the RV-utility hookup "camping" facilities? If no maximum allowed RV length is to be mandated, please explain the reasoning for this.*
- *Have the impacts of larger RVs over smaller RVs been evaluated for cumulative environmental impacts?*
- *Due to the lack of specific designations of tent-camping sites only, will the proposed project take into account the plausible scenario that all camp-sites could potentially be occupied by RV's, and in addition, account for the substantial environmental impacts that such a scenario would have on air quality, human health, water quality, traffic congestion, etc.?*
- *Will the proposed project increase the water demand of the Camp Richardson Resort area, and will ground water and surface waters be impacted?*
- *Has the proposed project taken the impacts of climate change into account? Will the water quality/ erosion BMPs be effective under the anticipated impacts of climate change, including the likelihood of more frequent and severe precipitation events in the form of rain?*
- Due to the substantial impacts of the proposed project, a cumulative impact analysis is needed as well as a Master Plan for the Camp Richardson Resort area, which would need to be approved by the TRPA Governing Board. The vision document for the Resort is not a substitute document for a Master Plan and is insufficient as a planning document. Why is the LTBMU not creating either a cumulative impact analysis or a Master Plan for the Camp Richardson Resort area?
- The vision document for the Camp Richardson Resort states that as family tent camping is a declining recreation segment, future projects should provide adjustments to respond to changing camping behaviors.
 - *Has the Forest Service done statistically reliable research on visitor camping preferences, in order to justify the above statement concerning a decline in tent camping? Is this statement suggesting a local decline in tent camping, regional, or national decline? If the trend is national, how accurately does the Tahoe Basin fit the national population of 'campers'? According to numerous sources on the RV Industry, RV sales have been*

dropping significantly over the last couple of years. Less people are buying RV's, which concludes that there will be a decrease in the demand for RV campgrounds and sites.

- The vision document for Camp Richardson Resort states that the vision for the campground is that it provides for high quality public camping experiences within its permit area.
 - *Define what the LTBMU means with the statement “provide for high quality public camping experiences”? Will more RV sites equal a higher quality camping experience than fewer RV sites?*

- The 1988 Forest Plan states that the Fallen Leaf Lake Management Area “will continue to be high priority for developed and dispersed recreation; however, it will be scaled down from past plans”.
 - *The proposed project intends to increase the overall number of RV camp sites at the Camp Richardson Resort Campground; can LTBMU justify the proposed project as being compatible with the above management objective?*

- The TRPA’s recreation threshold requires a “fair share” of the Basin’s resource capacity to facilitate the development of recreation facilities.
 - *Is the increase in RV camping sites over camping tent sites a “fair share” of the Basin’s resources for visitor and local populations alike? Will more RV camping sites exclude any members of the general public from using the Camp Richardson Resort campground facilities, therefore decreasing their recreational quality of experience? Furthermore, are tent campers deterred from camping at a site with hookups and if so, does this indirectly reduce the number of tent friendly sites available?*

Noise Pollution

- RVs have a greater impact on the noise threshold than tents. How will the noise threshold be impacted from an increase in RV sites? How will wildlife be effected by an increase in noise caused by both an increase in overall RV sites as well as creation of wintertime camping?

Wildlife Habitat

- Sensitive species: The Fallen Leaf Lake Management Unit contains at least one known site for wintering bald eagles in the Tahoe Basin. The U.S. Fish and Wildlife Service’s Bald Eagle Management Plan states that disruptive activities (i.e. a campground) in or near eagle foraging areas and roost sites may prevent eagles from feeding and taking shelter, reducing the chances of survival.
 - *Are there any know and/or potential bald eagle/goshawk nesting and roosting sites near the project area where campground activities can negatively impact to raptors? When were the last goshawk and bald eagle surveys done in the Fallen Leaf Lake Management Unit, for both winter and nesting populations? This is particularly important because by allowing for wintertime camping new impacts to these populations could occur that did not occur when campground use was restricted to summer season.*

- *Will the operation of a year-round RV campground impact bald eagle winter foraging and roosting habitat?*
- *Will campground activities disturb wildlife in the Pope Marsh? The 1988 Forest Plan states that for the Fallen Leaf Lake Management Unit that recreation use will be restricted in the Pope and Baldwin wildlife sanctuaries (i.e. Pope Marsh) during the nesting season of sensitive avian species.*

Vegetation Management

- The project is proposing the removal of up to approximately 950 trees from the 78.7 acre project area.
 - *Of the approximately 950 trees proposed for removal, what percentage of the trees being removed could qualify as unhealthy or be considered for removal through fuel reduction/defensible space practices?*
 - *Due to the large project size, 78.7 acres, how many stands and/or individual old growth trees will be impacted by this project? Of the impacted old growth, how many are planned for removal even if they are deemed healthy by a registered professional forester?*
 - *Of the up to 40 trees of a DBH of 30 inches or more proposed to be removed for the campground project what is the species composition and age-class (i.e. how many pines will be removed) of the trees to be removed? Why has this not been previously analyzed and/or made available for public review?*
 - *The use of site data from a 1987 survey for the identification of trees to be removed is not concise and specific enough to accurately describe the full potential impacts that this project, as proposed, will have on native vegetation of the forested environment of Camp Richardson. A new and thorough site survey of existing vegetative conditions, including trees, browse, and sensitive species, needs to be implemented before any project starts breaking ground in the Camp Richardson Resort Area.*
 - *How many trees will be removed from the project area by the addition of campsites in the currently unoccupied/developed area between the RV campsites and the Eagle's Nest campsites?*
 - *The procedures for the removal of trees from the project site states that where ever possible to retain trees with the following prioritization: retention of cedar trees first, pine trees second, and white fir trees third. Explain the scientific reasoning behind this strategy.*
 - *Why were alternative plans not made to minimize tree removal, especially old growth trees, while at the same time improving the level of high quality camping experiences?*

Resort Parking

- This project should include the implementation of a parking management plan for the entire Camp Richardson Resort and Tallac/Baldwin Recreation Areas to assess the current parking demands and issues, environmental conditions, and parking related environmental impacts, including impacts of traffic congestion, VMTs, and impacts to air quality such as increases in greenhouse gases.
- The League is concerned about the proposed project's increase in parking, including day-use parking, Jameson Beach Road parking, and campground extra vehicle parking. Addressed below are some of our current concerns with the proposed parking.
 - *What will the total number of 'new' parking spaces be for the proposed project? How many of these spaces will accommodate boat trailers and horse trailers?*
 - *How many off-highway parking spaces are currently available within the Camp Richardson Resort area and the Tallac Area? Of those off-highway parking spaces, how many are planned to be removed or made unavailable to visitors?*
 - *Will the project analyze the cumulative impacts of both the campground parking and the Resort parking; both over-night and day-use parking? Include impacts to air and water quality, VMT's, and traffic.*
 - *What will be the additional "emissions per person per mile" that the proposed Resort and campground parking will create? In addition, to "emissions per person per mile" what will be the impacts to greenhouse gases that the proposed parking will have?*
 - *Has a total parking capacity been determined for the Camp Richardson Resort area?*
 - *What types of vehicles will the campground 'extra vehicle'/'over-flow parking' area accommodate? Will over-sized RV's (recreational vehicles that are too large for the RV campsites) be allowed to accommodate this campground parking area?*

League Recommended Project

The League supports campground retrofit projects in the Basin that reduce overall hard and soft coverage (especially in sensitive class lands), preserve open space, encourage forms of recreation that have fewer environmental impacts associated with such use (i.e. tent camping), reduce the needs for extra parking, encourage alternative modes of transportation, and implement BMPs that are 'above and beyond' the required TRPA standard, etc.

Specifically, the League would like to have the Forest Service propose an alternative project for the Camp Richardson Resort campground that incorporates the following elements:

- Significantly reduce the number of RV utility hookup campsites allowed by not constructing RV sites in the area that is currently open RV space between the existing Eagle's Nest campground and the existing RV sites.

- Follow the example of California State Parks and limit the overall allowed size of RVs that the campground will be able to accommodate (i.e. up to 26 feet in length). In addition, do not allow over-sized RVs to park in the 'extra vehicle' parking area.
- Designate the non-utility hookup sites as tent-only camping sites to limit the number of RV's that can occupy the Camp Richardson Resort campground, thereby decreasing the overall environmental impacts associate with the use of RV's.
- Reduce the number of parking sites in the 'extra vehicle' campground parking area, as well as limit the size of the parking sites so as not to facilitate parking of large trailers.
- No year-round operations of the campground facilities will be permitted.
- Increase the number of highway parking sites that are to be removed from the Camp Richardson Resort/Tallac Historic area and restore those areas. Do not "move" the parking sites to other areas of the Resort.
- Remove the emergency access and maintenance roads out of sensitive classes of lands, and restore those areas.
- Significantly reduce the number of healthy conifer trees to be removed, especially old growth, from the project area by reducing the number and size of RV campsites.
- Increase the capacity of the storm-water BMPs to accommodate 100 year flood storm events.
- As the local light emitting code is very weak, we suggest a project that uses lighting standards recommended by the Dark Skies Initiative throughout the Resort area.

Overall, the League is supportive of the concept of retrofitting existing recreation facilities throughout the Tahoe Basin with BMPs to protect water quality and soils. However, we strongly discourage redevelopment projects that increase parking capacities, reduce public opportunities to utilize lower impact forms of recreation, and projects that remove a significant amount of native vegetation that are not specifically for the purpose of defensible space and healthy forest practices.

We appreciate the opportunity to provide comments and if you are in need of further information please contact Flavia Sordelet at 530-541-5388.

Thank you,

Flavia Sordelet
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 The League to Save Lake Tahoe