



June 24, 2008

Jody Brown
Environmental Branch Chief
Attention: Christopher Brown
Caltrans
2800 Gateway Oaks Drive
Sacramento, CA 95833

RE: Comments on the Initial Study and Proposed Negative Declaration on State Route 89 from Eagle Falls Viaduct to Meeks Creek Road Water Quality Improvement Project.

Dear Ms. Brown,

Thank you for the opportunity to provide comments on the Initial Study and Proposed Negative Declaration for the water quality improvement project along SR 89 in El Dorado County, California.

The following comments are submitted on behalf of the League to Save Lake Tahoe, a membership based non-profit organization dedicated to protecting and restoring the environmental quality, scenic beauty and low-impact recreational opportunities of the Lake Tahoe Basin.

The League to Save Lake Tahoe strongly supports Caltrans efforts to implement National Pollutant Discharge Elimination System (NDPES) permit requirements and water quality elements of the Lake Tahoe Basin Environmental Improvement Project (EIP). However, we have some concerns and suggestions relating to the proposed project.

Road Maintenance

Sanding of roads during winter road maintenance is a major component in decreasing lake clarity. Research has demonstrated that road dust emissions are four times higher in wintertime than in summertime as a result of the application of traction control materials (Kuhns et al, 2007). Ambient particulate matter (PM) measurements showed that urban areas had increases of PM concentrations from about 20 µg/m³ in summer to around 100

$\mu\text{g}/\text{m}^3$ in winter. Vehicles passing over sanded roads break these particles into fine particulate matter that is transferred by either surface runoff or aerial transport to the lake. In addition to the water quality treatments outlined in this EIP, the League urges Caltrans to explore and utilize more effective and less impactful methods of winter road maintenance that will reduce Caltrans contribution of fine sediments to Lake Tahoe. For example, the Nevada Department of Transportation (NDOT) uses a de-icing program that reduces the need for sand. Additionally, NDOT carefully selects the minimal amount of sand needed and chooses hard sanding materials that do not easily break down under the weight of vehicles and are low in such nutrients as phosphorus in order to reduce impact to lake clarity. Furthermore, the use of PM_{10} -compliant sweepers by Caltrans following storm and sanding events will substantially reduce lake bound sediments. These actions will assist Caltrans not only in meeting NPDES requirements, but will help achieve Total Maximum Daily Load goals for sediments and nutrients within the Basin.

Monitoring and Maintenance of Treatments

The League to Save Lake Tahoe believes that monitoring protocols and scheduled maintenance are critical, yet often underutilized elements of successful environmental improvement projects. Without monitoring and maintenance, it is difficult to determine the efficacy of a treatment and to ensure a system is functioning as designed. The Initial Study and Proposed Negative Declaration fails to provide a definitive maintenance schedule for treatment facilities. The League advises Caltrans to create a clear and effective monitoring/maintenance protocol and scheduling program to ensure that sedimentation basins and other treatment facilities are cleared and functioning properly and to their full effectiveness. By establishing these protocols Caltrans will ensure maximum efficiency of these systems and minimize the potential for untreated runoff entering Lake Tahoe and its tributaries.

Vegetation and Wildlife

It is of great concern that vegetation and wildlife surveys occurred during October and November, months in which vegetation is not in bloom and in which birds are not breeding and nesting. The League acknowledges that Caltrans plans to re-conduct the surveys during spring months before the start of construction will occur. It is imperative that this second round of surveys is completed and construction does not begin until it has been re-assessed that there will be no negative impacts to vegetation or wildlife.

Climate Change

Currently the project's treatment basins are designed for a 20 year, 1 hour storm event in order to meet NPDES permit requirements. However, experts predict that due to the impacts of climate change storm events will become more frequent and more extreme. In the near future a design based on the 20 year, 1 hour event may be insufficient at retaining fine sediments. Caltrans, as mandated by the state of California to proactively anticipate and respond to climate change, should design basins that are capable of handling larger storm events.

Thank you for the opportunity to comment on the Initial Study and Proposed Negative Declarations. Please contact the League to Save Lake Tahoe with comments or questions.

Sincerely,

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References:

Kuhns, H., Zhu, D., Gillies, A., Etyemezian, V., and Brown, S. 2007. Measurement and Modeling of Fugitive Dust Emissions from Paved Road Travel in the Lake Tahoe Basin. Prepared for the EPA by the Desert Research Institute and the Nevada Tahoe Conservation District.

