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Date: May 6, 2015  
To: Members of TRPA Governing Board; Mr. Brian Judge, Principal Environmental Specialist, TRPA; Mr. Alfred Knotts, Transportation Projects Manager, TTD  
From: The League to Save Lake Tahoe

**Re: State Route 89/Fanny Bridge Community Revitalization Project Final EIR/S**

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Dear members of the Governing Board, Mr. Judge, and Mr. Knotts,

The League to Save Lake Tahoe (the League) would like to commend Tahoe Regional Planning Agency (TRPA) staff and Governing Board for moving the certification of the Final Environmental Impact Statement (FEIS) for the Fanny Bridge project to May 2015. The process for the release of the documentation on this project has been rapid and difficult to keep up with. Allowing the public to have an additional month to review the extensive FEIS is greatly appreciated. After reviewing the FEIS the League has the following comments:

- **Mitigation Measure 4.15-2a is Still Insufficient for Degradation of Operations at Granlibakken Road/SR 89 Intersection**
- **Mitigation Measure 4.3-2d Should Include a 1:1.5 or 1:2 Ratio for Stream Environment Zone (SEZ) Restoration**
- **Caltrans Maintenance Yard Could be Relocated and Used as an Opportunity for Restoration**
- **Fanny Bridge Visioning Must Occur for the Tahoe City Community**
- **Public Process for Document Review Should be Refined for Future Projects**

**Background**

The foci of the project are the SR 28/SR 89 intersection and the Fanny Bridge in Tahoe City, California. During peak seasons congestion at this wye intersection is incredibly problematic resulting in lengthy delays. The idling of cars associated with the traffic create detrimental impacts to air quality in the Lake Tahoe Basin. The 90 year old Fanny Bridge is heavily used by pedestrians which contributes to traffic

delays. The project is aimed at restoring the structural integrity of Fanny Bridge and resolving traffic congestion in Tahoe City.

The public process for the project has been underway for several years. However, the manner in which the environmental documents were released made it difficult for the public to provide input and participate at all levels of review. The Draft EIS (DEIS) was released by the Tahoe Transportation District (TTD) and TRPA in December 2014 before the holiday season. While TRPA did extend the commenting period by ten days following the February 2015 Governing Board presentation, all informational meetings for the DEIS had been completed. The FEIS was released two weeks after the extended deadline for the DEIS. The TTD held a board meeting four days after the FEIS was released to certify the document but postponed approval. The board then waited until their meeting two weeks later to certify. The entire process of document release was rushed and incredibly difficult for the public to follow. The DEIS and FEIS were thousands of pages of technical documents being approved at a hurried pace. These types of projects should have a realistic review time frame to encourage meaningful input and participation from both the public and decision makers.

**Mitigation Measure 4.15-2a is Still Insufficient for Degradation of Operations at Granlibakken Road/SR 89 Intersection**

Mitigation measure 4.15-2a relating to the degradation of operations at Granlibakken road does not sufficiently mitigate the significant impacts. The League submitted the following comments relating to the DEIS and Mitigation Measure 4.15-2a;

“Implementation of Alternative 1 would result in level of service (LOS) “F” conditions (which is very poor) under opening day 2018 conditions and the 20-year planning horizon conditions under this alternative. <sup>1</sup> This significant impact requires mitigation. Mitigation Measure 4.15-2a applies to this alternative and states,

‘Article 15.28.010 of the Placer County Code establishes a road network Capital Improvement Program. The payment of traffic impact fees funds the Capital Improvement Program for area roadway improvements. Placer County has already identified the SR 89 and Granlibakken Road intersection as a future Capital Improvement Program project. The project *is not defined at this time*; however, the improvements will modify the type of control at this location to reduce the delay for the side street movements on Granlibakken Road. Placer County is the agency responsible for this mitigation measure... *Before initiating construction of the improvements to the SR 89/Granlibakken Road intersection, an Encroachment Permit from Caltrans will need to be approved.*<sup>2</sup>

This mitigation measure is unclear in direction for such a significant impact. Placer County is not a partner in this DEIS document. The relationship and role of Placer County to this project will be discussed further below; however, this critical mitigation measure requires immediate attention. The

<sup>1</sup> State Route 89/Fanny Bridge Community Revitalization Project. Draft EIR/EIS. December 2014. Traffic and Transportation. p(s). 4.15-38, 39

<sup>2</sup> State Route 89/Fanny Bridge Community Revitalization Project. Draft EIR/EIS. December 2014. Traffic and Transportation. p(s).4-15-55

League finds it worrisome that this mitigation measure relies on a project that is not defined and also relies on a Caltrans permit. Although the project is currently listed under Placer County's Capital Improvement Program, there are no specific details associated with the project. A projection of costs, identified funding mechanisms, and a timeline for implementation should be included in the Final Environmental Impact Statement (FEIS). Permitting through Caltrans has been historically difficult and time consuming for Basin development. It is unclear what this process would entail. Until these concerns are vetted this mitigation measure will not suffice for the significant impacts associated with Alternative 1.<sup>3</sup>

The FEIS did not address the concerns raised by the League above. The FEIS states,

“As stated in the mitigation measure, Placer County has identified the SR 89 and Granlibakken Road intersection as a future Capital Improvement Program project, and the Lead Agencies have confirmed that Placer County plans to improve operations at this intersection. Placer County is a CEQA Responsible Agency based on its funding commitment to the project and the potential that Alternatives 1 through 4 would transfer facilities to the County for operation and maintenance. As such, for any actions needed by the County after project approval by the Lead Agencies, it would consider the action in light of the analysis, impact conclusions, and mitigation commitments in this environmental document. Placer County's Responsible Agency review would focus on whether their actions are adequately addressed in this environmental document, whether additional mitigation measures would be needed beyond the commitments contained herein. In addition, Mitigation Measure 4.15-2a requires a Caltrans encroachment permit, which will be necessary for project implementation upon adoption of the mitigation measure.<sup>4</sup>”

The FEIS explanation only reiterates that Placer County will be responsible for a Capital Improvement Program and that a Caltrans encroachment permit is needed. Again, this is not an appropriate mitigation measure for the degradation of intersection operations at the Granlibakken intersection. There is no discussion on funding mechanisms or a timeline for completion of that project. As previously stated, Caltrans permitting process is historically difficult and time consuming. The project proponents should consider other alternatives to mitigate this impact.

#### **Mitigation Measure 4.3-2d Should Include a 1:1.5 or 1:2 Ratio for Stream Environment Zone (SEZ) Restoration**

The project proponents took the League's comments regarding identification of SEZ restoration within the Truckee River watershed seriously. The preferred alternative will be associated with unavoidable SEZ loss. To further mitigate this loss, mitigation measure 4.3-2d (Compensate for unavoidable loss of SEZ) was added to the FEIS. Acknowledging that this is a step in a positive direction, the League recommends taking a further step. While most of the impacts associated with this project will not immediately impact the Lake Tahoe Basin, TRPA is still a lead agency for the project and is responsible for threshold attainment. The League suggests adding a 1:1.5 or 1:2 ratio for SEZ

<sup>3</sup> League to Save Lake Tahoe Comments on Fanny Bridge DEIS, February 17, 2015. p.4

<sup>4</sup> State Route 89/Fanny Bridge Community Revitalization Project. Final EIS/EIR. March 2015. p.3-124

restoration (amount lost to amount restored). This would allow the project proponents to aid TRPA in making their required findings and improve threshold status.

### **Caltrans Maintenance Yard Could be Relocated and Used as an Opportunity for Restoration**

The Caltrans maintenance yard could be used as an opportunity for restoration considering the significant changes that will be made to it by this project. The preferred alternative will require the primary ingress and egress to the Caltrans maintenance yard to be relocated and modified. Fuel tanks, pumping facilities, and a pole barn will be demolished and relocated to accommodate this change.<sup>5</sup> While the environmental impacts associated with this change were assessed in the DEIS and FEIS, the League recommends the Governing Board take this opportunity to discuss the future of the maintenance yard. This industrial use is located incredibly close to the Truckee River. The preferred alternative is creating significant changes to the environment within the project location. The fact that construction and impacts from this project are already occurring the timing is appropriate for a relocation and restoration. Considering a relocation of the maintenance yard and restoration of the site would not only help in mitigation of the project, but would help TRPA reach threshold attainment. It would create open space in an appropriate location and restore the environment within the project site that is overall being disturbed.

### **Fanny Bridge Visioning Must Occur for the Tahoe City Community**

There must be a visioning process for the future of Fanny Bridge and the surrounding area for the Tahoe City community. The League recommended in previous comments that visioning for Fanny Bridge once it is released to Placer County be coordinated with Placer County Area Planning. This was noted in the FEIS.<sup>6</sup> Since the DEIS and FEIS have been released, Placer County has been working diligently on its Area Plan process. Rather than relying on the overall visioning for Fanny Bridge to occur through the Area Plan, there should be a separate (or concurrent) process for this site that includes the TTD and TRPA. Placer County will be certifying the environmental documents and will be responsible for Fanny Bridge as a County Road. However, the TTD and TRPA should be held accountable as the project proponents in seeing the future of Fanny Bridge meets community needs. Access to businesses, parking considerations, and bridge and landscape design are critical components to the Tahoe City community. This responsibility cannot be forgotten once the project is approved and fall only to Placer County to implement.

### **Public Process for Document Review Should be Refined for Future Projects**

The League would like to reiterate the gratitude for TRPA allowing another month before certifying the FEIS. As already explained, the process for the document release related to this project was an expedited one. The League requests that future TTD and TRPA projects allow for sufficient time for document review before the documents are approved by either board. Comments from the public will not only create a more transparent process, but will also build community support. The process for this project should not be repeated.

<sup>5</sup> State Route 89/Fanny Bridge Community Revitalization Project. Final EIS/EIR. March 2015. p.3-132

<sup>6</sup> State Route 89/Fanny Bridge Community Revitalization Project. Final EIS/EIR. March 2015. p.3-133

## Recommendations

The Fanny Bridge project is one that is needed to resolve serious traffic problems in Tahoe City. The League looks forward in participating in the design review for the preferred alternative. At this time the League recommends;

- **Other options be considered as mitigation for the Granlibakken intersection degradation;**
- **A 1:1.5 or 1:2 ratio for SEZ restoration be added as mitigation;**
- **The Caltrans maintenance yard relocation and restoration be considered;**
- **TTD and TRPA to be included in Fanny Bridge visioning process;**
- **Public process for projects in the future allow for sufficient time to comment.**

Sincerely,

Shannon Eckmeyer  
Policy Analyst  
League to Save Lake Tahoe