



Placer County
Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov
cjacobse@placer.ca.gov

Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89449
lmaloney@trpa.org

Ascent Environmental, Inc.
P.O. Box 5022
128 Market Street, Suite 3E
Stateline, NV 89449
Nanette.hansel@ascentenvironmental.com

Date: August 15, 2016
To: Ms. Crystal Jacobsen, Ms. Lucia Maloney, and Ms. Nanette
From: The League to Save Lake Tahoe
Re: **Comments on Draft Environmental Impact Report/Statement for Placer County
Tahoe Basin Area Plan and Tahoe City Lodge Project**

Dear Ms. Jacobsen, Ms. Maloney, and Ms. Hansel:

The League to Save Lake Tahoe (the League) appreciates the opportunity to provide comments on the Draft Environmental Impact Report/Statement (DEIR/S) for the Placer County Tahoe Basin Area Plan (the Area Plan) and Tahoe City Lodge Project (the Lodge Project). The public process for this Area Plan is a testament to stakeholder collaboration. The League has worked closely with Placer County and Tahoe Regional Planning Agency (TRPA) staff to implement environmental targets throughout this planning process. The League incorporates in Attachment D an analysis conducted by Mr. Greg Riessen, P.E. relating to traffic impacts (consultant to the League). While the League ultimately hopes to support this Area Plan, serious concerns relating to the TRPA vehicle miles traveled (VMT) threshold must be resolved in the final environmental review. Fine sediment from the urban landscape, mainly coming from roads caused by intensive use by vehicles, is the number one cause of loss of clarity and impacts to lake water quality. The League recommends that proper mitigation for traffic increase be included in the Area Plan and that TRPA consider halting issuance of any new development

entitlements until this threshold is critically assessed. The associated comment letter contextualizes these and other issues related to the DEIR/S:

- **Placer County has worked diligently over the past four and a half years to create a draft Area Plan for its entire jurisdiction within the Lake Tahoe Basin which incorporates input from community stakeholder teams. The League has participated as a stakeholder and engaged in thorough conversations with Placer County and TRPA relating to environmental issues within the Area Plan. This Area Plan has seen several renditions with hours of not only input from stakeholders, but negotiations with TRPA Governing Board members through Regional Plan Implementation Committee (RPIC) meetings. The results have provided opportunity for both economic redevelopment incentives and environmental restoration. These efforts must be highlighted to demonstrate the amount of collaboration expended so that the below concerns do not hinder this progress.**
- **The Area Plan cannot be used as mitigation for near-Basin project VMT impacts. It appears Placer County is relying on any progress on existing traffic problems through the stakeholder and community input for this Area Plan to solve increased traffic demand created by the Village at Squaw Valley Specific Plan (Squaw), Martis Valley West Specific Plan (Martis Valley), and Brockway campground projects.**
- **The DEIR/S fails to properly analyze the cumulative effects of Squaw and Martis Valley on VMT. The current VMT Threshold (from the Area Plan DEIR/S) is 2,030,938 VMT per day (on the peak day), and the current status is 1,937,070 VMT, the addition of 37,582 VMT from Squaw and Martis Valley projects will bring the status to 1,974,652 VMT. This would mean the *entire* Lake Tahoe Region would be within 0.97% of attainment, meaning there is only 3% before the region is out of attainment. This does not include the Brockway campground project, which could very well bring the region out of attainment. An accurate assessment of cumulative impacts for Squaw and Martis Valley must be conducted using consistent VMT calculations.**
- **The VMT analysis in general is inadequate. The VMT threshold and associated baseline are arbitrary. The standard of “significance” in Area Plan DEIR/S for VMT threshold is arbitrary. League requests information on current and existing conditions for VMT in Lake Tahoe.**
- **Inconsistencies and inadequacies in terms of VMT need to be resolved in preparation for the 2016 threshold update. Information needed to resolve the inadequacies include, but are not limited to:**
 - **The 2015 traffic counts used in the DEIR/S that have not yet been provided to the public.**
 - **A true assessment of what constitutes a trip length for VMT analysis.**
 - **Resolution between the 2012 Regional Plan Update (RPU) VMT counts and the Area Plan VMT counts and baseline establishment as highlighted in Attachment D.**

- **This Area Plan has failed to mitigate traffic impacts relating to VMT and ignored suggestions from the Regional Transportation Plan (RTP) and Tahoe City Mobility Plan (Mobility Plan). The League has provided additional mitigation detailed in Attachment D that include:**
 - **Additional local transit.**
 - **Consideration of road tolls and parking fees.**
 - **Elimination of parking minimums and impositions of parking maximums, for all land uses.**
 - **Moratorium on new non-residential parking spaces. Any new commercial parking space would require removal of an existing commercial parking spaces.**
 - **Require “unbundling” of residential parking spaces within apartment buildings.**
 - **Require “unbundling” of non-residential parking spaces.**
 - **Institute a parking tax on all pay to park lots.**
 - **Install parking meters for on-street parking along CA SR 28.**
- **Greenhouse Gas Emission (GHG) calculations must be reassessed when VMT inconsistencies are resolved.**
- **Reconcile inconsistencies in land use zoning changes to Fairway South Tract and Greater Tahoe City Plan Area Mixed-Use Recreation and the RPU as these were not analyzed in the RPU. The changes shall either be eliminated or an appropriate environmental analysis must be conducted as the analysis cannot be tiered off of the RPU environmental review. The League again requests information in the final review as to where the RPU environmental review is being used.**

Again as stated above, the League recommends that adequate mitigation for VMTs be incorporated into the Area Plan and TRPA should consider not issuing any future entitlements to new development projects until the VMT threshold flaws are resolved. The League is confident our organization, Placer County, and TRPA can work on solutions collaboratively so that the final review is adequate and the VMT threshold is appropriately analyzed in the 2016 threshold review.

Sincerely,
 Darcie Collins, PhD
 Executive Director
 League to Save Lake Tahoe

Enclosure: 2016.8.15 League to Save Lake Tahoe's Comments on Draft Environmental Impact Report/Statement for Placer County Tahoe Basin Area Plan and Tahoe City Lodge Project