

Good-day. These comments are submitted by Carole Black a resident of Incline Village, NV.

I would like to provide public comment regarding the current Coronavirus pandemic as it intersects with life here at Tahoe. I applaud the many interventions implemented this past week re Covid-19. In addition, I offer several recommendations based on identified issues and interventions implemented and/or recommended elsewhere. Given the information found on line, every Covid-19 case will infect approximately 2.8 others who will in turn each infect more. Thus every case avoided is a significant important opportunity and every preventive action taken now is critically important!

So what are current priority considerations re Covid-19 and Travel/Tourist Impacts at Tahoe?

In the Tahoe basin area there is increased risk related to individuals driving/arriving from nearby highly impacted areas. The Bay area has imposed a “shelter in place” order to contain spread and we are but a short drive away! Yet there is apparently no identification or tracking process in place to screen or track appropriate quarantine activity for sick folks or their contacts driving into the Tahoe area.

Several of us have heard of transient visitors coming from high risk areas especially this week, some apparently ill. Thus, and in the context of the reportedly limited local testing to date, it seems reasonable to assume that current reports of "no/few cases at the lake" are likely unreliable.

Potential interventions to limit further case incidence and spread will be important and include:

1) Require warning comments and restrictive notices on all governmental and tourist-serving websites regarding the Tahoe Basin area. Many web sites for tourist areas nationally have already posted such warnings and several Tahoe area websites already display pages about closures and risks admonishing travelers to “stay home.” This messaging should be expanded to all similar websites for all jurisdictions around/near the lake. In addition, website pages extolling the joys of the remaining available potential activities only serve to either confuse tourists or encourage visits and should be removed for now.

2) Restrict hotels, etc and all forms of “Transient Lodging” (for example, as listed in WCC Chapter 25 and including STRs): As best I can tell, CA and NV do not yet require hotel, motel, STR, etc closure. To protect the community and tourists who might otherwise optimistically but unwittingly travel to this high risk/low resource area, action is needed NOW to require all lodging facilities in the Tahoe tourist region to implement rigorous limitations temporarily restricting tourist and non-essential business stays..

Heavily toured areas around the country have restricted/closed lodging facilities - hotels, motels, etc and including STRs. Examples include Breckenridge, CO; Miami Beach,FL and the Florida Keys. In addition, several national parks including Yosemite and many beaches have closed.

3. STRs require urgent action: In addition to attracting visitors to our area high risk and poorly resourced area, please recall that STRs have NO requirements for cleaning or sanitation and there are virtually no sanitizing supplies currently available for private purchase. Further, occupancy levels in STRs exceed that of average residences making distancing challenging especially if an occupant becomes ill or has an exposure.

“Self-policing” of STRs either from a rental or appropriate precaution or quarantine perspective will almost certainly be insufficient putting residents, renters and our limited local health care capacity at increased risk. I thus encourage addressing by implementing emergency monitoring/restrictions ASAP including closure of STR rentals during this period of rampant viral spread.

4. Health screenings at entry points into the Tahoe Basin: There are limited access points into the geographic area. Given the elevated risk profile based on proximity of nearby very high risk areas and our local area's limited resources , travel restrictions should be considered. Visitors and returning residents entering the area could be screened at the few road entry points with turn-around or other appropriate intervention for tourists exhibiting concerning history, symptoms or signs as is occurring in airports. Returning residents and/or residents' immediate family members arriving to assist them, similarly screened, could be directed to appropriate interventions and monitored.

Perhaps jurisdictions around the lake could band together with a series of restrictive regulations/enforcement? Cars are checked for chain control when indicated – what about considering health/symptom screens now?

The BOTTOM LINE: A public health catastrophe related to excess tourism in the Tahoe Basin at this time will not be of benefit to residents, tourists or the long-term tourism industry/area economy. Reasonable restrictions as noted above are the appropriate steps and the right thing to do. We look to TRPA to take a leadership role in facilitating and coordinating appropriate responses of all constituent entities around the lake at this time of unprecedented risk.

Thank you.

Note: <800 words

Good-day. These comments are submitted by Carole Black a resident of Incline Village, NV:

I would like to provide public comment regarding the proposed Washoe County Tahoe Area Plan and related STR Ordinance which will be considered by this committee at upcoming meetings. I have also submitted more detailed written comments with illustrative slides to be included in the written Public Comment document for this meeting which I hope you will review and consider. In addition, we'll return with more detail when the topics are formally agendized.

The currently proposed WC Tahoe Area Plan and related STR Ordinance represent an intense effort and encompass broad change with impacts anticipated for many years to come. Nonetheless, there are significant concerns in two major categories: process and content.

First PROCESS: The Tahoe Area Plan is a long, complex document which has undergone major revision in the last few weeks. For a document of this size, complexity, import and implication, the level of public commentary opportunity provided to date has been insufficient. Though there has been much prior community discussion over many years, there has been only one noticed public meeting since major revisions began late October, and none to address the current version. By comparison, in another jurisdiction where I own property, a comparable planning process was undertaken via chapter by chapter review over many months in working sessions with extensive public input and discussion.

Next CONTENT: While there is much very positive content included in the extensive documents, there are priority content concerns in the categories listed below:

First, the Area Plan presentation at the single public meeting was inaccurate obscuring major proposed changes. Specifically, though there are in fact major changes in zoning approach as well as in concepts and programs included in the proposal, an inaccurate statement was repeatedly made at the public meeting and included in the document: "there are no zoning changes [except a few related to Fairway and Ponderosa areas]." This is simply incorrect and misleading!

In addition, the proposals include content which is misleading and/or incomplete. Examples include:

- 1. The Tahoe Area Plan as drafted obscures major zoning changes resulting from the de facto adoption of TRPA zoning even though existing WC classification is more restrictive and therefore "compatible with TRPA." In addition, the interplay of proposed changes with other code elements is not addressed. For example, proposed changes would negate WCC imposed "Transient Lodging" penalties for an STR renter who provides false rental information - a restriction which might help to avoid a mishap such as occurred in Orinda last fall.**
- 2. Incorrect assumptions are included regarding Area Occupancy in both the Area Plan and STR Ordinance: Only residents are considered and added occupancy impacts of transient tourists/visitors are omitted. Tourists have substantially increased area occupancy particularly during busy seasons with more vehicles and people crowding the area. Impacts are thus not projected correctly re Safety and the Environment as well as impacts on housing supply.**

3. Neighborhood character is mentioned throughout both documents, yet conflicting perspectives appear: The STR Ordinance presents STR Tier levels for permitting which do not align with actual resident occupancy and will therefore potentially adversely impact neighbors without any ability to directly respond at the permitting decision point. Further there are no STR density or intensity regulations nor is "buffering" between residents and other uses which might have mitigated impacts considered.

4. Prioritized Area Plan projects and policies do not reliably address root cause: The most prominent examples are Transportation and Parking. There is much emphasis on trails, paths, and public transport systems - yet no attention to the underlying root cause of added occupancy with congestion from transient tourism bringing more people and vehicles with adverse impacts on safety and the environment. A comprehensive Area Occupancy Plan is needed with matching emergency services capability and evacuation capacity.

5. The Area Plan and STR Ordinance fail to fully address public health/safety risks: If the unnecessary adoption of TRPA zoning proceeds as proposed, STRs will escape public health regulations applied to all other forms of Transient Lodging with similar characteristics and risks. The alternative of designating STRs as Transient Lodging as already noted in WCC Chapter 25 avoids this gap while still allowing in residential areas with permitting requirements like other forms of Transient Lodging. Focus areas include sanitation, pest/vectors and sharps/biohazardous waste, etc. Coronavirus recommendations raise added concern.

6. There is a lack of robust, timely measurement. The Area Plan largely relies on TRPA measurement which, though robust and academically based, is infrequent. To understand impacts of changes and develop any required interim interventions, more frequent, focused measurement is required. Further, the impacts of the recent rampant growth in STRs with area occupancy impacts has yet to be seen given TRPA's measurement schedule. Thus the environmental impacts of the added people and vehicles related to STR growth need to be explicitly assessed with a formal EIS and now!

MY CONCLUSION: These documents, WC Tahoe Area Olan and STR Ordinance, as currently drafted include concepts and details which are of significant concern to me, my family and other residents. As occurred with the draft STR Ordinance recently considered by the WC BOC, I believe that the proposed Tahoe Area Plan is also "not ready" for approval at currently drafted, requiring more detailed review and open public/community input and consideration. Hopefully, significant revision will occur before these documents reach you. I hope that this overview of current priority concerns will be helpful as you consider the final draft documents in future meetings.

Thank you for your consideration.

Note: Total <950 words

Washoe County -
RSCVA 3/22/2020.

<https://www.visitrenotahoe.com/>

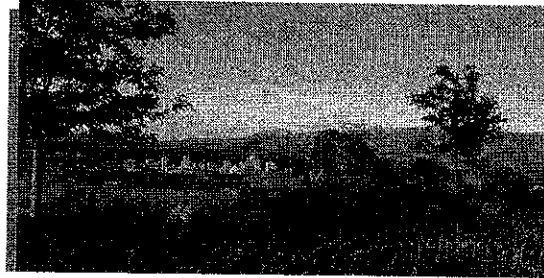
<https://www.visitrenotahoe.com/plan-your-trip/travel-advisories-and-updates/>



TRAVEL ADVISORIES AND UPDATES

Get information related to closures in the Reno Tahoe area, as well as links to additional health and travel resources.

[Travel Information](#)

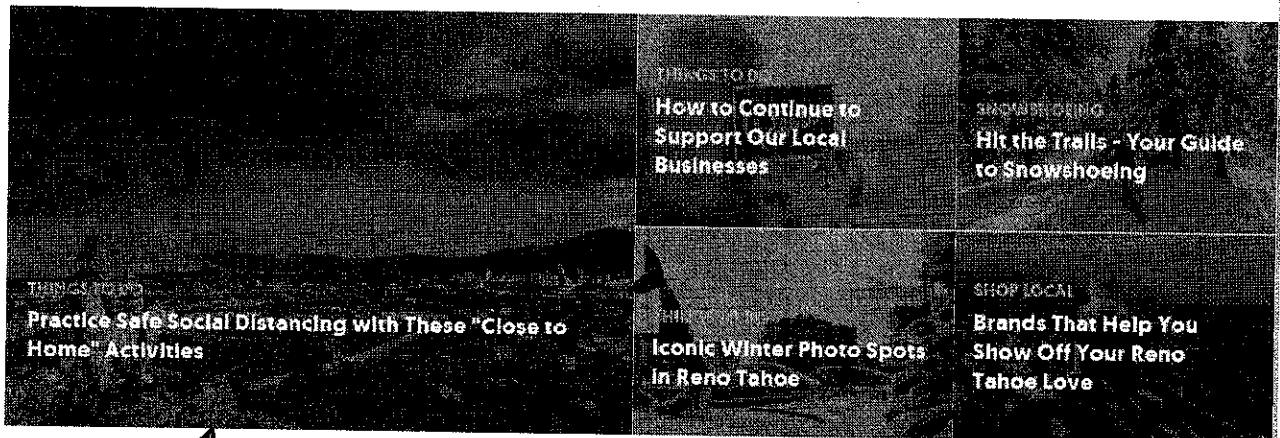


RenoTahoe

Reno Tahoe eNews

Register

CHECK OUT OUR TIPS, LISTS AND STORIES



While travel is not being advised at this time, the Reno Tahoe team would like to urge locals to support the few businesses that remain open for drive-thru, carryout, limited and off-site services. All Reno Tahoe businesses are important to supporting regional tourism! We are all in this together. #StayHomeForNevada

Please don't invite out of town people to Incline activities. See advertising biking, snowshoeing + photos at this link.

Breckenridge, Colorado

Short-Term Vacation Rentals

Breckenridge

With confirmed community spread of the COVID-19 virus in Summit County, all lodging businesses, including hotels, motels, timeshares and short-term rentals (e.g. Airbnb, VRBO, etc.) are required to close by 12 noon, Thursday, March 19, 2020.

It is a violation of the Amended and Restated Public Health Order dated March 17, 2020 for guests to stay past 12 noon on Thursday, March 19, 2020, in a short-term lodging unit.

Currently there is no end date to this restriction but we will post updates as we receive them.

However, if you are under a quarantine or isolation order, you must abide by the terms of that order. In addition, if you are a local worker who currently resides in short-term lodging, please contact EOC@SummitCountyCO.gov

For more information, please refer to the following links:

Amended and Restated Public Health Order (<http://www.summitcountyco.gov/civicalerts.aspx?AID=564>)

Public Health Order Q&A (<http://www.summitcountyco.gov/Blog.aspx?IID=299>)

Summit County regulates short-term vacation rentals (STRs) to address neighborhood impacts and life safety issues. Summit County's regulations for STRs are applicable to properties within the unincorporated areas of Summit County.

STR Permit Application Process Update

If you have submitted an STR permit application, but have not yet received an approval or denial decision, you can check the status of your application on



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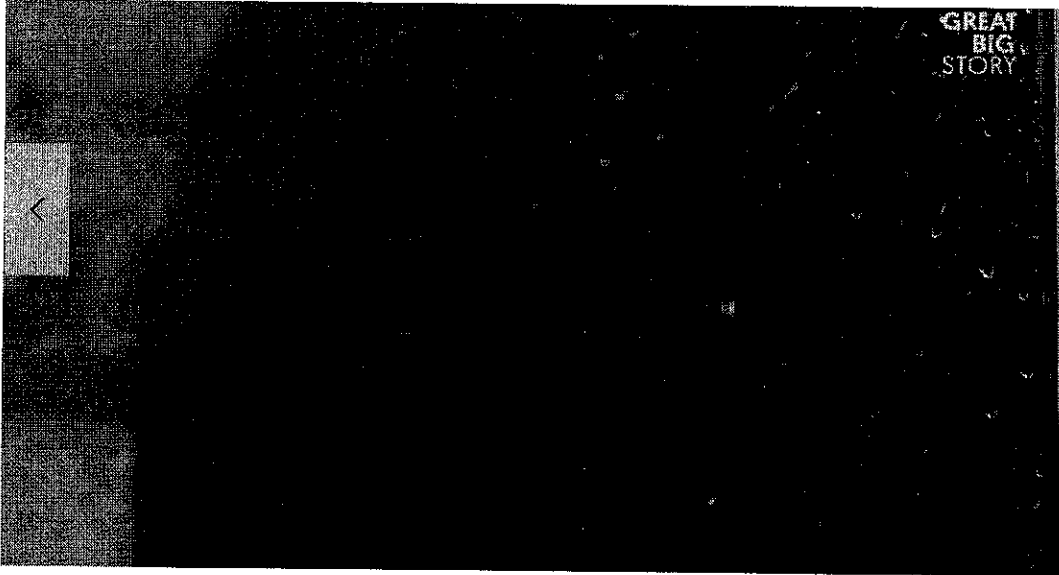
Miami & Florida
No, thanks Add it now Ke
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 Sanders considering
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AdChoices

Living alone on a paradise island



MIAMI (CBSMiami) – On Friday, about a dozen residents of Key Largo gathered near the Welcome sign and Visitors Center to tell people the opposite: Please go home!

"I'm sorry people. Your life is more important than your vacation right now," said Sandy Hall, who has lived in Key Largo for 10 years.

By Sunday at 6 p.m., all hotels, guest homes, short-term rentals in RV parks, and vacation rentals have to close down in the Florida Keys. Tourists who are already in Monroe County can stay to figure out travel plans, but visitors who try to come in now will be asked to turn away. Hotels can no longer take new reservations.

"For every person who comes in, they're leaving a footprint, and just exposed all of those people," said Marlen Weeks, who has lived in Key Largo for more than 40 years.

Bald Head, Cape Fear, Carolina

Head Island declared a State of Emergency that includes a Voluntary Evacuation for the Village of Bald Head Island and mandates the discontinuation of all vacation rentals and day visits until at least April 30, 2020," according to a statement from Bald Head Island.

In an effort to better gauge the public's reaction to the coronavirus, Port City Daily hosted a poll on Twitter asking the simple question, should beaches be closed to out-of-town visitors? At the time of publication 77.8% of the 54 people who answered think the beaches should be closed.



Port City Daily
@PortCityDaily

Should New Hanover County close the beaches to visitors from out of town like Dare County has?

80% Yes, it's needed

20% No, we need the tourists

84 votes • Final results

3 10:02 AM - Mar 19, 2020

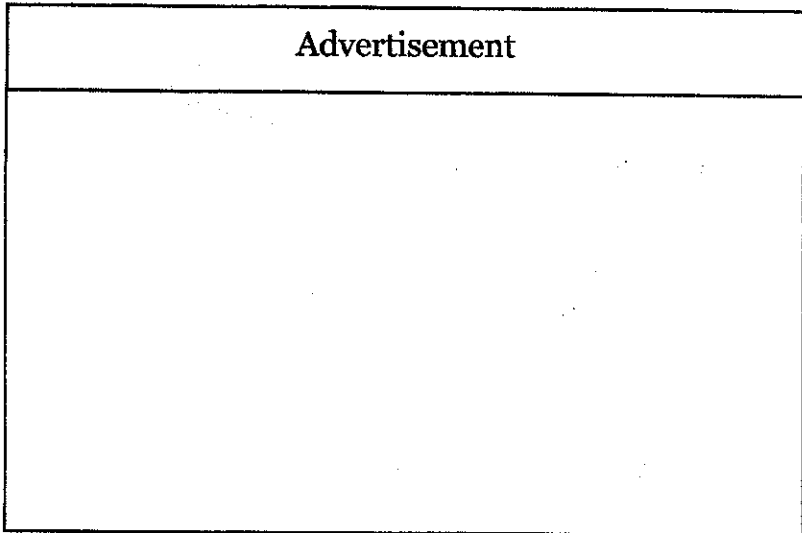
See Port City Daily's other Tweets

Send comments and tips to Michael.p@localvoicemedia.com and follow him on Twitter and Instagram

More on Port City



Advertisement



COVID-19 Public Notice. Mammoth Mountain has suspended operations as of March 15. Click here for more information. (https://www.mammothmountain.com/covid)



☁ 23°F (PART)

I'M LOOKING FOR

TICKETS (/WINTER/PLAN-A-VACATION/BOOK-A-TRIP/LIFT-TICKETS)

LESSONS (/WINTER/PLAN-A-VACATION/BOOK-A-TRIP/BOOK-LESSONS)

RENTALS (/WINTER/PLAN-A-VACATION/BOOK-A-TRIP/RENTALS)

SEASON PASSES (/WINTER/PLAN-A-VACATION/SEASON-PASSES)

COVID

LODGING (/BOOK-LODGING)

DEALS & PACKAGES (/WINTER/PLAN-A-VACATION/PLAN-A-VACATION/DEAL

CONTACT US (/WINTER/HOME/CONTACT-US)

COVID-19 INFORMATION AND RESOURCES

We anticipate heavy call volume over the next several days and appreciate your patience as we work hard to respond to all inquiries and requests for refunds. Please be aware that we can only reimburse reservations booked directly with Mammoth Mountain.

In order to better manage all requests, please send us an email to 800Mammoth@MammothResorts.com (mailto:800Mammoth@MammothResorts.com.) including your last name and your reservation number, with the subject line *COVID Refund Request*. The call center team will contact you as soon as possible for the reimbursement of your lift tickets, activities, ski school, rentals and more.

[View Information & Resources \(https://www.mammothmountain.com/covid#information\)](https://www.mammothmountain.com/covid#information)

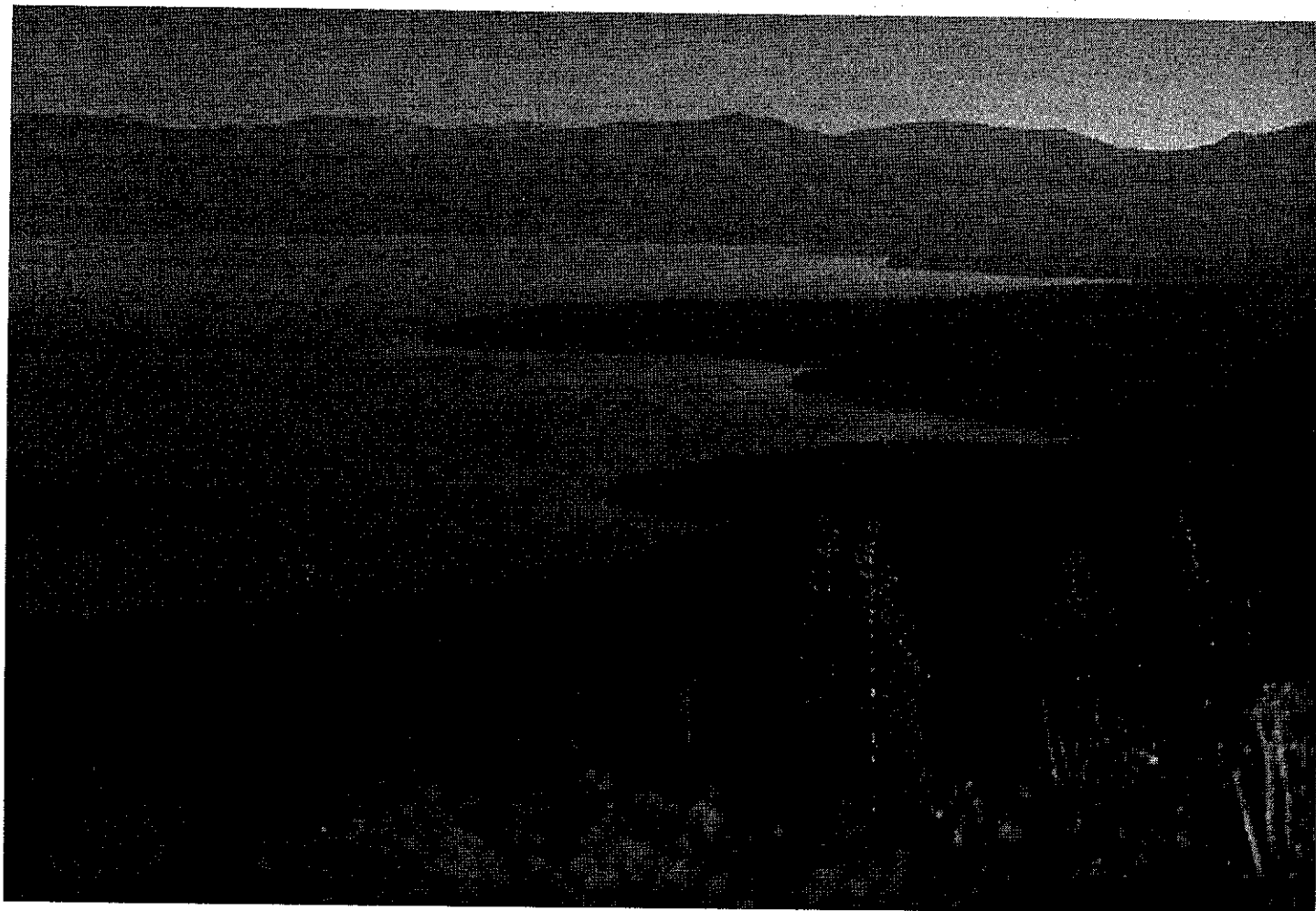
[View Updated Change/Cancellation Policy \(https://www.mammothmountain.com/covid#cancellation\)](https://www.mammothmountain.com/covid#cancellation)

Latest Updates

MARCH 18 10AM

From Mammoth Lakes Tourism:

We're asking anyone who is not a primary resident of Mammoth Lakes or providing essential services to our residents NOT to visit Mammoth Lakes for the time being. The reason is simple: as a small, remote mountain community our healthcare facilities lack the capacity to handle a widespread outbreak of COVID-19. Additionally, services in Mammoth Lakes are currently extremely limited. Mammoth Mountain and restaurants (excluding



[HOME \(HTTPS://WWW.GOTAHOENORTH.COM/\)](https://www.gotahoenorth.com/) > NORTH LAKE TAHOE NEEDS YOUR HELP: COVID-19 COMMUNITY UPDATE

NORTH LAKE TAHOE NEEDS YOUR HELP: COVID-19 COMMUNITY UPDATE

Updated: March 20, 2020

North Lake Tahoe continues to monitor the coronavirus (COVID-19) outbreak with guidance from local and state officials, along with tourism industry partners to ensure the most accurate and timely information is provided to visitors on this topic.

The safety of our visitors and local community are of the utmost importance to North Lake Tahoe. At this time, we ask that all visitors keep loving us from a distance for now, postpone travel plans and come back again when travel is safe and viable. When normal returns, North Lake Tahoe will be here to welcome you back.

Healthy Travel Information

Posted in Featured, Uncategorized | March 21, 2020 | By Tahoe South

Updated March 21, 2020

The Lake Tahoe Visitors Authority, representing California and Nevada on the South Shore, is encouraging visitors to reschedule non-essential travel for a later date when health officials determine it's safe. While there are no cases of COVID-19 in South Lake Tahoe, health experts, and government officials have ordered no public gatherings, school, and tourism-related closures and are highly recommending self-quarantine practices and social distancing at this time.

We are working closely with the El Dorado County Public Health Department, Douglas County Public Health Department, Barton Memorial Hospital, Visit California, Travel Nevada, and the City of South Lake Tahoe to gather and share the latest developments regarding the evolving Coronavirus Disease 2019 (COVID-19) situation and its potential impacts on travel to Lake Tahoe Basin.

Within the last week businesses surrounding South Lake Tahoe, Calif., and Stateline, Nev., have been making the difficult but necessary decisions of canceling/rescheduling special events, fundraisers, meetings/conventions and gatherings. In addition, numerous hotels, all Stateline casinos, bars, wineries, ski resorts, restaurants (excluding take out services), are closed anywhere from two to four weeks, or until further notice.

On March 4, 2020, the state of California declared a State of Emergency to help the state qualify for additional funding and resources to prepare for COVID-19 in the future.

On March 15, 2020, Vail Resorts has announced that its North American resorts and retail stores will be closed for the 2019-20 winter ski season. Dependent on the COVID-19 situation and weather conditions, Heavenly may reopen in late April/early May. Sierra-at-Tahoe Resort is suspending operations for the 2019/2020 season indefinitely.

On March 17, 2020, Nevada Gov. Sisolak announced closures of all non-essential businesses/services including casinos, gyms, beauty salons, bars/wineries that do not include meals provided by a full kitchen must close for 30 days. For details from the State of Nevada visit: Risk Mitigation Initiatives.

On March 19, 2020, California Gov. Newsome announced a statewide shelter-in-place order. Californians can go out for essential errands such as medical appointments, grocery shopping or to do critical jobs, but are otherwise advised to stay away from others. Details: www.gov.ca.gov.

“This is something I thought I'd never have to say throughout my tourism career, but please stay home at this time,” said Carol Chaplin, CEO and president of the Lake Tahoe Visitors Authority. “The safety of our visitors and locals alike is of utmost importance, and in order to combat this pandemic we all need to do our part so we can enjoy the destination we love sooner. Once it is deemed safe by the health experts, we can welcome you with open arms and will be joining you. The mountain town you love needs you to love it from a safe distance. Stay home, stay healthy and we'll see you when it's safe to travel again.”

While Lake Tahoe's natural geography makes social distancing possible with its many outdoor activities like snowshoeing, cross-country skiing, trails, bike paths, beaches, etc., the impact of visitors on a small community would quickly overwhelm existing resources and risk lives with the limited capacity of health facilities.

Both the El Dorado and Douglas County Health Departments are recommending normal seasonal flu health precautions. According to the Centers for Disease Control and Prevention (CDC) website, there are no COVID-19 travel restrictions for the Continental U.S. and the CDC is not recommending canceling or postponing travel in the Continental U.S.

Healthy Travel Practices from the CDC:

Carteret County declares state of emergency, asks non-residents not to enter

New Jersey

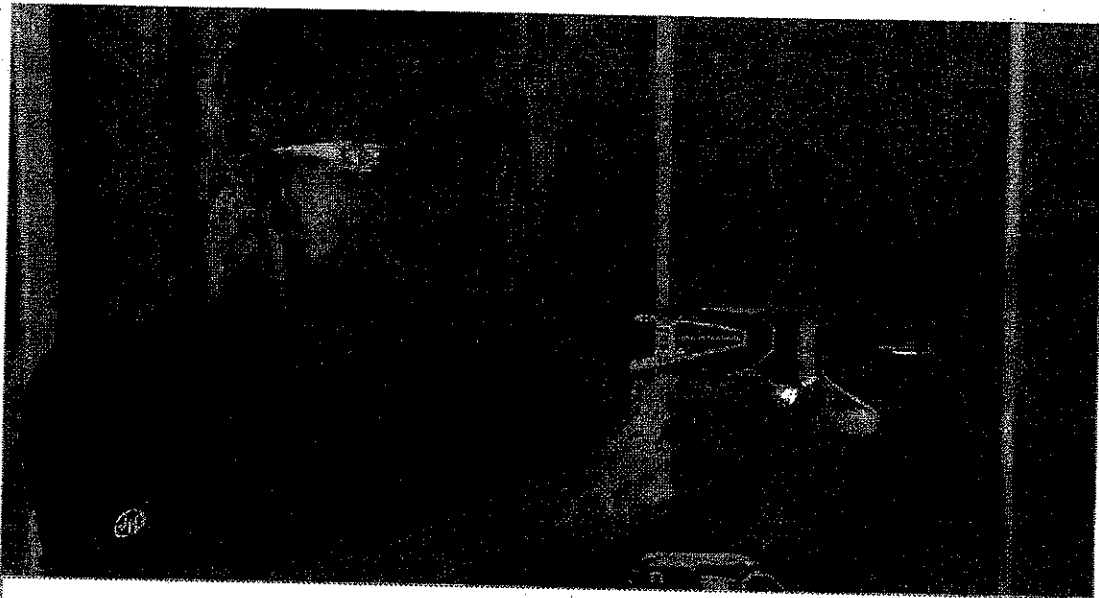
by Nick Sinopoli, Annette Weston and Sydney Basden
Thursday, March 19th 2020

AA

“Based on the recommendations, the County discourages travel to the coast at this time to reduce the possible community spread of COVID-19, said Carteret County Manager Tommy Burns, “Our County Government, municipalities and community businesses are working diligently to maintain resources for the health and everyday provisions of permanent residents.”

As of Thursday evening, officials have announced that all county-maintained beach access points will close beginning Friday. This includes Salter Path, Radio Island and Harkers Island beach accesses.

Carteret County heavily relies on tourism dollars, but for now, they are asking tourists to stay away.



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“The reason we came to the beach is we wanted to make a good time out of an annoying circumstance,” Zoe Raymond, a tourist, says.

Hundreds of people were on the beach in Emerald Isle Thursday, some who live in the area and others saying they are visiting for the weekend.

Sun Valley
Idaho

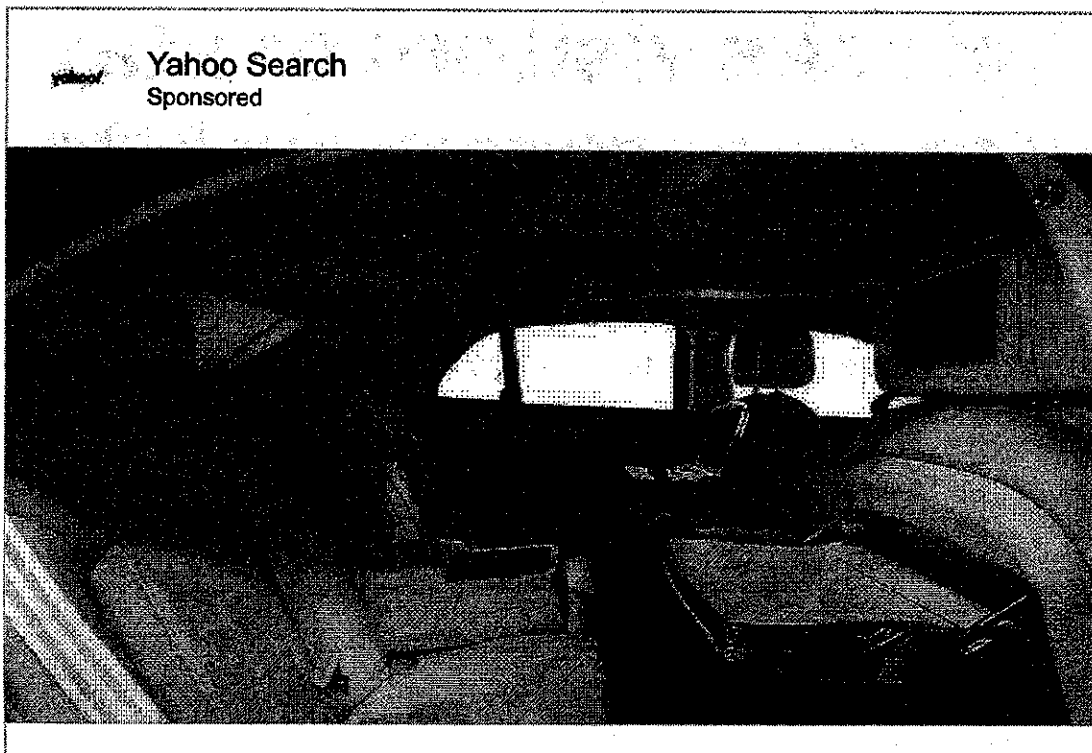
McCall asks visitors to stay away after coronavirus hits hard in Sun Valley

Posted: 3:40 PM, Mar 20, 2020 Updated: 2:44 PM, Mar 20, 2020

MCCALL, Idaho — *This article was originally written by Ximena Bustillo with the Idaho Statesman.*

One of the Treasure Valley's most popular getaway towns is asking visitors to stay away.

The City of McCall, along with various medical centers and first responders in Valley County, has issued a travel advisory requesting that visitors avoid McCall until further notice.



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NEWS

Ige urges visitors to stay away for 30 days; all non-essential state workers to stay home

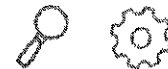


Gov. Ige announces sweeping closures across Hawaii to prevent community spread

By HNN Staff | March 17, 2020 at 2:39 PM HST - Updated March 18 at 6:21 AM

HONOLULU, Hawaii (HawaiiNewsNow) - Amid growing fears that the coronavirus is spreading in the community, the governor issued a host of new orders and guidelines Tuesday, directing all non-essential state workers to stay home, asking visitors to stay away, and directing bars to close.

The actions when fully put in place will all but bring Hawaii's no. 1 economic driver — tourism — to a halt, dramatically change the pace of daily life in the islands, and trigger widespread economic pain.



PSA: MOUNTAIN TOWNS ARE NOT SAFE HAVENS DURING COVID-19

Mar 20, 2020

By: [Katie Lozancich](#)

[Follow](#)



Views

75,821

Comments




Sorry folks, this is not a time for a roadtrip. Wikipedia Photo.

There seems to be this strange perception that mountain towns are safe in the wake of the current COVID-19 crisis. Safe to whom? Most of these small communities have limited medical resources, in fact, the town of Jackson, Wyoming only has 10 ventilators. All it

Utah

READ THE STORY

MOAB AND OTHER ADVENTURE TOWNS ARE PROHIBITING NON- LOCALS

MAX RITTER | NEWS |  15K

These views will still be here after this all blows over. Now is not the time for a desert vacation. Max Ritter photo. Earlier this week, the Southeast Utah Health Department issued an order

READ THE STORY



NEWS

Wrightsville Beach, Surf City, Pleasure Island will close all beach access Friday

By WECT Staff | March 20, 2020 at 10:38 AM EDT - Updated March 21 at 4:35 PM

SOUTHEASTERN NORTH CAROLINA (WECT) - Carolina Beach, Wrightsville Beach and Surf City officials announced Friday that all beach accesses in their respective communities will be closed beginning today.

“The town of Wrightsville Beach by order of the mayor and chief of police has closed all beaches (sound and ocean side) and accesses through March 31,” a Facebook post by the town’s police department stated.

The decision is effective immediately and will remain in place until it’s rescinded or superseded by another declaration, the post continued.

Wrightsville Beach officials said police officers will be patrolling the strand and have the authority to arrest anyone who doesn’t comply.

Officials also said all town restroom facilities will be closed and ask that residents and visitors refrain from using parks and other public spaces.

In Surf City, Mayor Doug Medlin said they’re taking proactive measures and closing all public beach access sites, public parking areas, and town parks beginning at noon Friday.

These measures will be in effect until rescinded.

“In addition, we are urging all business owners and residents to follow the Governor’s Executive Orders for the health safety and welfare of our community. We ask for your understanding and

Panama City Beach and the Florida Keys announce beach closures amid coronavirus pandemic

By Leah Asmelash and Hollie Silverman, CNN

🕒 Updated 6:55 PM ET, Fri March 20, 2020

CNN

US

• LIVE TV

Sen. Rick Scott to spring breakers: What are you thinking? 02:16

(CNN) — The Florida Keys and Panama City Beach announced they would restrict access to beaches in an attempt to control the spread of the coronavirus, following a trend set by other local governments in the state.

Starting Sunday at 6 p.m., the Florida Keys will temporarily close to visitors as coronavirus continues to spread throughout the state, according to a news release from the Keys.

Not only will the beach close, so will hotels and other lodging properties. The announcement comes after the island chain found its first confirmed case of coronavirus, which was announced late Thursday.

"We understand that this is a tremendous inconvenience to our visitors as well as to our businesses, and more than an inconvenience to our workers — our families who live here," said Monroe County Mayor Heather Carruthers. "But the health and safety of both our visitors and our residents is paramount."

Panama City Beach will also be closing, starting Friday at 7 p.m., following a unanimous decision from the city council. The closure is expected until March 26, a news release from the city council said.

On March 26, the Panama City Beach City Council will meet again to decide whether to extend the closure.

The news is significant, particularly for a state that relies heavily on tourism.

The Florida Keys' tourism industry, for example, generated more than \$1.8 billion for the islands' economy in 2018, the

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting
Agenda Item No. XII.A Main Street Management Plan also related to Tahoe South Event Center

I am still playing catch-up. In researching recent information that provides clarity of the issues as related to the necessary mitigations established/negotiated and performance metrics that must be met to ensure zero net VMT for the proposed Event Center I have provided refresher info for all to review.

Cart before the horse Main Street Management Plan first then Event Center is the logical course of action and approval in providing the microtransit requirement to be fulfilled for mitigation to succeed along with the paid parking requirement.

Necessary funding of the Main Street Management Program coincides with achieving some of the proposed mitigations for the Event Center and mitigation success using adaptive management. Identifying that funding/sources is crucial.

2015 Information

http://www.trpa.org/wp-content/uploads/Main-Street-Management-Plan-Work-Plan_REVISED_051519.pdf 19 pages

The consultant will refine the preferred alternative as necessary based on feedback and consult with TTD to integrate the property and improvements ownership, management, and funding plan (section 1.5 of the TRPA Permit Condition 3B) into the alternative

Appendix B: South Shore Community Revitalization Project (SSCRP) Track List (TRPA & TTD)

Obtain Funding for SSCR Implementation (TTD Lead, TRPA Support)

Track 1: Main Street Management Plan:

- Main Street Uses, Wayfinding Implementation Plan, Performance Standards, Monitoring and Refinements (TRPA Lead)
- Main Street Property and Improvements Ownership, Management, and Funding Strategy (TTD Lead)

Track 2: Replacement Housing (TTD Lead)

Track 3: Parking Management (TTD Lead)

Track 4: Circulator Transit (TTD Lead)

Track 5: Rocky Point Neighborhood Amenities Plan (TTD Lead)

Track 6: US 50 Engineering and Construction (TTD Lead)

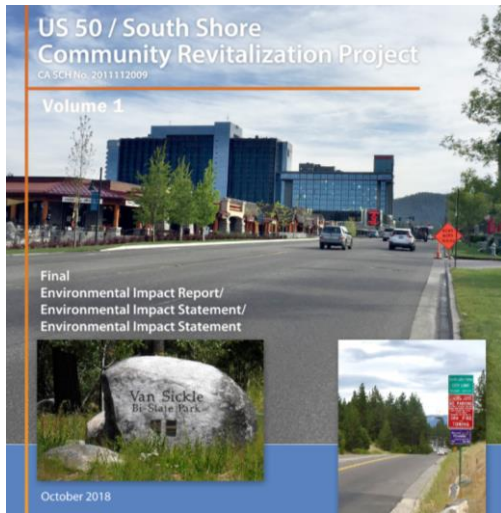
Track 7: Secure Project Funding (TTD Lead)



I am requesting the applicant or TTD provide an up to date summary/spreadsheet identifying all secured funds/sources as well as all unsecured proposed FHWA, other grants, possibly Douglas County, etc. funds expected to be obtained to adequately fund the project.

Example: Was/Is a Build Grant from FHWA part of this requested funding stream? I believe the deadline for this grant round is July 15, 2020? And how much was requested?

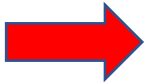
<https://www.trpa.org/document/projects-plans/> October 2018 Final EIR/EIS/EIS



<http://www.trpa.org/wp-content/uploads/US-50-0-Summary.pdf> 108 pages

Page 1 Summary

The project is included in the Tahoe Metropolitan Organization (TMPO) 2015 Federal Transportation Improvement Program (FTIP) and the 2017 FTIP list of projects. It is also listed as a fiscally constrained project in the RTP/SCS, adopted in December 2012. "Fiscally constrained" means that the costs of the proposed projects, over the 23-year plan horizon of the RTP, are within the reasonably foreseeable revenues of that period and, therefore, the project is prioritized for implementation. The 2017 Regional Transportation Plan (2017 RTP), which is an update to the 2012 RTP/SCS, and its joint CEQA/TRPA environmental document was approved on April 26, 2017 after the release of the Draft EIR/EIS/EIS for this project. The vision and goals of the 2017 RTP were based on the 2012 RTP. The projects listed in the 2017 RTP are substantially similar to those in the 2012 RTP, and the US 50/South Shore Community Revitalization Project is included in both documents.



TTD, the Tahoe Regional Planning Agency (TRPA), and the Federal Highway Administration (FHWA) are the lead agencies preparing a joint environmental document for the US 50/South Shore Community Revitalization Project. The environmental document is an environmental impact report (EIR) for TTD pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.); an environmental impact statement (EIS) for TRPA pursuant to the Tahoe Regional Planning Compact (Public Law 96-551) and 1980 revision (Compact), Code of Ordinances, and Rules of Procedure; and an environmental impact statement (EIS) for FHWA pursuant to the National Environmental Policy Act (NEPA) (42 U.S. Code [USC] Section 4321-4347), the Council on Environmental Quality (CEQ) Regulations Implementing NEPA (40 Code of Federal

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Summary

Regulation [CFR] Section 1500-1508), and FHWA Environmental Impact and Related Procedures (23 CFR Section 771). TTD is also the project proponent.

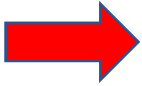
On April 24, 2017, TTD, TRPA, and FHWA distributed a Draft EIR/EIS/EIS to public agencies and the general public for review and comment. The Draft EIR/EIS/EIS evaluated five alternatives, consisting of four action or build alternatives (Alternatives B, C, D, and E) and one no-action alternative (Alternative A). (Note: The discussion under the header "Rationale for Selecting Alternatives Considered in Detail" in Chapter 2, "Proposed Project and Project Alternatives," of this document, summarizes the reasons for selecting the alternatives evaluated in detail in the EIR/EIS/EIS.) Three action alternatives (Alternatives B through D) include realignment of US 50 on the mountain side of the tourist core, pedestrian and bicycle enhancements to improve connectivity and safety, conversion of existing US 50 to a local street, and construction of replacement housing for displaced residents. One action alternative (Alternative E) would construct a raised pedestrian walkway over existing US 50 alignment within the portion of the tourist core between the resort casinos. The realignment alternatives also propose a pedestrian bridge that provides an additional connection between the tourist core and Van Sickle Bi-State Park.

Summary

The following are key issues related to the project:

▲ **Acquiring Project Funding**

- TTD has funding to complete the environmental review process and full design (preliminary through final) of the approved alternative. TTD also has some right-of-way funds for property acquisition and relocation, which have been secured through State Transportation Block Grant (CA and NV) and Congestion Mitigation and Air Quality (CMAQ) grants. Funding for the remaining property acquisition, relocation, and project construction would come from a variety of federal, state, and local sources, including Federal Transportation Act funds incorporated into recently passed legislation, Greenhouse Gas Reduction Fund from revenues of the Cap-and-Trade program administered by the California Air Resources Board, and newly adopted taxes from Douglas County, among others.



▲ **VMT Effects**

- The travel route along US 50 with the realignment alternatives would be 0.4 mile longer around the tourist core than the current US 50 alignment straight through it. This increase in travel length would

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Summary

cause a small localized increase in VMT; however, the project's mobility enhancements and revitalization of planned development in an urban center would be consistent with attaining the regional total VMT threshold (as required by the Lake Tahoe Regional Plan and evaluated in the Regional Plan Update EIS). A master response (Master Response 1: Adequacy of VMT Analysis) included in Appendix O of this Final EIR/EIS/EIS comprehensively responds to concerns related to project effects on VMT.

S.5 SUMMARY OF IMPACTS AND MITIGATION

As discussed above, the US 50/South Shore Community Revitalization Project is a joint project proposed by TTD, TRPA, and FHWA, and is subject to state and federal environmental review requirements. Project documentation, therefore, has been prepared in compliance with CEQA; TRPA's Tahoe Regional Planning Compact, Code of Ordinances, and Rules of Procedure; and NEPA. TTD and TRPA have determined that an EIR and an EIS, respectively, would provide the appropriate level of environmental analysis. Impacts described in this document were found to be potentially adverse under NEPA, requiring preparation of an EIS.



Chapter 3, "Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures," of the Draft EIR/EIS/EIS describes in detail the environmental effects that would result from implementation of the project alternatives. Impacts are determined to be: 1) no impact; 2) not adverse, for the purposes of NEPA, or less than significant, for the purposes of CEQA and TRPA; 3) adverse, for the purposes of NEPA, or significant or potentially significant, for the purposes of CEQA and TRPA (potentially adverse changes in the environment, for which mitigation measures are required); and 4) adverse, for the purposes of NEPA, or significant and unavoidable, for the purposes of CEQA and TRPA (adverse changes in the environment that cannot be feasibly reduced to less-than-significant levels with mitigation measures). Where appropriate, for the purposes of CEQA and TRPA, beneficial impacts associated with the project alternatives are also noted.



I find these statements to be curiously similar to the potential impacts stated in the Event Center but an Environmental Assessment was approved after the Initial Checklist.

Should an EIS still be considered the correct analysis method based on potentially adverse changes for the purposes of NEPA and adaptive management criteria needing a couple of years to tested for accuracy and adjustments?

As well as I'm always skeptical about the potential for mitigating away "significant and unavoidable" impacts. The same roads, intersections, parking and microtransit will be used by the Event Center. Actually, adding to the roadway usage just to park a vehicle.

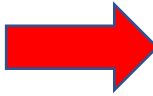
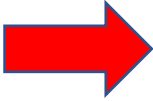
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3.5 Public Services and Utilities					
<p>Impact 3.5-1: Conflicts with existing utility infrastructure Transportation improvements and construction of mixed-use development, including replacement housing, for Alternatives B, C, and D could result in conflicts with existing utility infrastructure and require relocation of utilities or access points to utility infrastructure (i.e., water, sewer, electrical, and natural gas services). Depending on the alternative, utility infrastructure that could be affected by the build alternatives is generally located at and around the existing US 50/Pioneer Trail and Pioneer Trail/Echo Road intersections and along existing US 50, Fern Road, Moss Road, Montreal Road, and the lake side of Lake Parkway. TTD would be required to coordinate with utility providers to address the project's conflicts with utility infrastructure. However, the extent to which existing utility infrastructure could be adversely affected, and plans for relocation, have not yet been determined, and plans for any necessary relocation have not yet been determined.</p>	<p>Alt A = NI Mitigation Measure 3.5-1 has been incorporated into Alternatives B, C, D, and E to further reduce to the extent feasible the environmental consequences related to conflicts with existing utility infrastructure.</p>	<p>Alt A = NI Alts B, C, D, E = PS</p>	<p>Mitigation Measure 3.5-1: Prepare and implement a Utility Relocation Plan Study This mitigation measure is required for Alternatives B, C, and D transportation improvements and mixed-use development, including replacement housing, and Alternative E, for the purposes of NEPA, CEQA, and TRPA. Before the start of construction-related activities, including demolition of displaced residential, hotel/motel, and commercial buildings, the TTD (and the project proponent for the mixed-use development, as applicable) shall coordinate with the South Tahoe Public Utility District (STPUD), Douglas County Sewer Improvement District (DCSID), Edgewood Water Company (EWC), Lakeside Park Association, Liberty Utilities, NV Energy, and Southwest Gas Corporation to relocate utility infrastructure, which is dependent on the alternative and could include infrastructure at and near the existing US 50/Pioneer Trail and Pioneer Trail/Echo Road intersections and along US 50, Fern Road, Moss Road, Primrose Road, Montreal Road, and the lake side of Lake Parkway. The final design plans for the transportation improvements submitted to Caltrans and NDOT shall be prepared to minimize utility disruption or relocation, and identify all utility relocations affected by the transportation improvements. TTD (and the project proponent for the mixed-use development, as applicable) shall coordinate with the utility companies to</p>	<p>Alt A = NI Alts B, C, D, E = No additional mitigation measures would be needed or are feasible to implement.</p>	<p>Alt A = NI Alts B, C, D, E = LTS</p>

This is also another funding resource required that has yet to be identified. And is also identified as Potentially Significant (PS). Will Douglas County be expected to supplement infrastructure funding for the potential of utility relocation? Where do those funds come from if not Douglas County?

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting
 Agenda Item No. XII.A Main Street Management Plan also related to Tahoe South Event Center

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<p>Impact 3.6-2 Impacts of transportation improvements on intersection operations – 2020 (Opening Day) The US 50/South Shore Community Revitalization Project would not generate additional 2020 (opening day) vehicle trips that could affect intersection operations; rather, it would implement improvements to existing transportation infrastructure and change circulation patterns within the study area. For Alternatives B, C, and D, US 50 would be realigned to connect to and approximately follow the existing Lake Parkway East alignment. Under Alternatives A and E, the existing US 50 roadway alignment would remain the same as existing conditions. Under Alternative E, level of service (LOS) intersection operations would remain at acceptable levels in 2020 and LOS at the intersection of Old US 50/Stateline Avenue would improve substantially. Under Alternatives B and D, LOS would improve at several intersections compared to existing conditions. All intersections would operate at acceptable LOS under Alternative A. The implementation of Alternative C would result in unacceptable intersection LOS at the new US 50/Pioneer Trail/Old US 50, Old US 50/Park Avenue/Heavenly Village Way, and new US 50/Lake Parkway/Old US 50 (roundabout option) intersections during summer peak-hour conditions. Exhibits 3.6-10 through 3.6-18 show the lane geometry and study area volumes associated with each of the project alternatives. Because redevelopment of one or more of the mixed-use development sites would not</p>	<p>The design features of Alternatives A, B, D, and E would avoid or minimize the impacts on intersection operations in 2020 such that no additional mitigation measures are needed or feasible to implement; Mitigation Measure 3.6-2 has been incorporated into Alternative C to further reduce to the extent feasible the environmental consequences related to impacts on intersection operations in 2020.</p>	<p>Alt A = LTS Alts B, D, E = B Alt C = S</p>	<p>Mitigation Measure 3.6-2: Change the eastbound and westbound directional traffic on US 50 This mitigation would apply to Alternative C transportation improvements for the purposes of NEPA, CEQA, and TRPA. During subsequent design phases, the project proponent shall reverse the directions of traffic flow on US 50 such that eastbound US 50 would be realigned onto a new alignment along Lake Parkway southeast of existing US 50, and westbound US 50 would remain in place as under existing conditions.</p>	<p>Alts A, B, D, E = NA Alt C = No additional mitigation measures would be needed or are feasible to implement.</p>	<p>Alt A = LTS Alts B, D, E = B Alt C = LTS</p>
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Summary

Table S-1 Summary of Resource Topics with Impacts and Avoidance, Minimization, and/or Mitigation Measures

Resource Topics/Impacts	Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation (by Alternative)		Avoidance, Minimization, and/or Mitigation Measures	Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)	
	NEPA	CEQA/TRPA		NEPA	CEQA/TRPA
generate new trips as it would provide replacement housing for displaced residents and the remaining site(s) would be constructed between 2020 and 2040, the Alternatives B, C, and D mixed-use development sites were not analyzed under this 2020 (opening day) scenario.					

Opening Day is no longer 2020. Is a correction to the approved 2018 Final documentation required to reflect opening day in 202x?

2020 Opening Day is mentioned on several more pages.

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting
 Agenda Item No. XII.A Main Street Management Plan also related to Tahoe South Event Center

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Resource Topics/Impacts	Impact Determinations (CEQA, TRPA) before Mitigation (by Alternative)			Avoidance, Minimization, and/or Mitigation Measures	Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)	
	NEPA	CEQA/TRPA			NEPA	CEQA/TRPA
Adv = Adverse B = Beneficial LTS = Less than significant MU = mixed-use NA = Not applicable NAdv = Not adverse NI = No impact PS = Potentially significant S = Significant SU = Significant and unavoidable						
minimize Alternative A impacts on roadway segment operations in 2040.					environmental consequences related to roadway segment operations in 2040.	
Impact 3.6-14: Impacts on vehicle miles of travel - 2040 (Horizon Design Year) Realignment of US 50 to create the opportunity for community revitalization in the Stateline/South Lake Tahoe tourist core is included in the approved RTP (originally named Alternative 3 in the 2012 RTP/SCS EIR/EIS) and the RTP would have a net beneficial effect by reducing regional per capita VMT. The opportunity for community revitalization would be a source of reduced VMT, because visitor uses could be concentrated in a compact, pedestrian/bicycle/transit-served urban core, decreasing the need to take vehicle trips to reach some tourism destinations (e.g., hotel to restaurant or entertainment venue trip, retail shopping trips). The realignment, itself, would cause a small, localized increase in VMT for through traffic with Alternatives B, C, and D, because the route of US 50 would be slightly longer around the tourist core than through it; however, its mobility enhancements and support of planned development in an urban center would be consistent with attaining the regional total VMT threshold (as required by the Lake Tahoe Regional Plan and evaluated in the Regional Plan Update EIS). The realignment of US 50, would remain consistent with the VMT per capita goal of RTP/SCS EIR/EIS Alternative 3 and would support achievement of the Regional Plan VMT requirements, so the beneficial impact of the RTP on regional VMT would be sustained. Alternatives B, C, and D would help implement the RTP's beneficial impact on regional VMT. Alternative A would affect VMT because it would not support revitalization of the tourist core and would retain the same length of US 50 in the corridor. For Alternative E, the	The design features of Alternatives A, B, C, D, and E would avoid or minimize the impacts on VMT in 2040 such that no additional mitigation measures are needed or feasible to implement	Alts B, C, D = B Alts A, E= LTS	No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA.	Alts A, B, C, D, E = NA	Alts B, C, D = B Alts A, E= LTS	

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Summary

Table S-1 Summary of Resource Topics with Impacts and Avoidance, Minimization, and/or Mitigation Measures

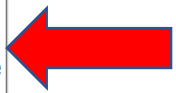
Resource Topics/Impacts	Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation (by Alternative)		Avoidance, Minimization, and/or Mitigation Measures	Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)	
	NEPA	CEQA/TRPA		NEPA	CEQA/TRPA
Adv = Adverse B = Beneficial LTS = Less than significant MU = mixed-use NA = Not applicable NAdv = Not adverse NI = No impact PS = Potentially significant S = Significant SU = Significant and unavoidable					
existing roadway alignment would remain the same with separation of pedestrians on an elevated structure. It would not support revitalization in the tourist core as effectively as the realignment alternatives and the through-traffic trip length on US 50 would be unchanged.					

Prediction of beneficial impacts and attaining the regional total VMT threshold for the “2040 Design Year” cannot be made until adaptive management identification of proposed mitigations are analyzed. I know this was a 2018 approved environmental document but without the Event Center. Another reason to revisit this 2018 approval as the Main Street Management Plan has not been implemented.

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting
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<p>Impact 3.6-20: Daily vehicle trip ends (DVTE) impacts - 2040 (Horizon/Design Year) Alternatives B, C, and D transportation improvements would not generate any additional DVTEs. However, these three alternatives would all generate greater than 200 net new DVTEs with the implementation of the mixed-use development. Because the displaced housing would be replaced at a one for one basis with the replacement housing component of these alternatives, the replacement housing would not generate any net new DVTEs. Alternative A would include no modifications to the existing conditions. Alternative E would not generate any additional DVTEs.</p>	<p>Alt A = NI Mitigation Measure 3.6-20 has been incorporated into Alternatives B, C and D to further reduce to the extent feasible the environmental consequences related to generating additional daily vehicle trip ends; The design features of Alternative E would avoid or minimize the</p>	<p>Alts B, C, D, E = LTSS Alt A = NI</p>	<p>Mitigation Measure 3.6-20: Mitigate DVTE/DVTE Impacts through Air Quality Mitigation Fund Contribution This mitigation would apply to Alternatives B, C, and D mixed-use development for the purposes of NEPA, CEQA, and TRPA. The project proponent shall contribute to the Air Quality Mitigation Fund in accordance with Chapter 65 - Traffic and Air Quality Mitigation Program of the TRPA Code. The air quality mitigation fee shall be assessed in accordance with the mitigation fee schedule in the TRPA Rules of Procedure. Fees generated by the air quality mitigation fee are used to support programs/improvements that reduce</p>	<p>Alts A, E = NA Alts B, C, D = No additional mitigation measures would be needed or are feasible to implement.</p>	<p>Alts B, C, D, E = LTS Alt A = NI</p>
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 US 50/South Shore Community Revitalization Project EIR/EIS/EIS

Summary

Table S-1 Summary of Resource Topics with Impacts and Avoidance, Minimization, and/or Mitigation Measures

Resource Topics/Impacts	Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation (by Alternative)		Avoidance, Minimization, and/or Mitigation Measures	Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)	
	NEPA	CEQA/TRPA		NEPA	CEQA/TRPA
	environmental consequences related to daily vehicle trip ends in 2040 such that no additional mitigation measures are needed or feasible to implement.		VMT, improve air quality, and encourage alternative modes of transportation.		

Please provide the calculation and amount that will be generated by the Air Quality Mitigation Fund in accordance with TRPA Code and fee schedule as well as previous request of noted Federal Transportation Act Funds or possible Build Grant, etc. funding in a summary and spreadsheet that is up to date.

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting
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3.7 Visual Resources/Aesthetics					
<p>Impact 3.7-1: Degradation of scenic quality and visual character Build Alternatives B through E would involve physical changes within the project site that would be visually evident to the public. Depending on the nature and intensity of project-related changes, they could potentially degrade the existing visual quality or character of the site and its surroundings, including a potential decrease in the TRPA Travel Route rating of roadway travel units or inconsistency with the TRPA SQIP, TRPA Design Review Guidelines, or applicable height and design standards. Under Alternatives B, C, and D, the existing four-lane US 50 through the tourist core would be reconfigured as a two-lane roadway. Lake Parkway and Montreal Road would be developed as the realigned US 50, either as a four-lane or two-lane roadway, depending on the alternative. A new section of roadway would be built from Montreal Road at Fern Road connecting to existing US 50 near what is now the intersection of US 50 and Pioneer Trail through an existing neighborhood. Under Alternative E, no changes to existing roadways would occur, except the removal of the signalized at-grade pedestrian scramble between Montbleu Resort Casino and Spa and the Hard Rock Hotel and Casino. Instead, an elevated pedestrian skywalk structure would be constructed over US 50 through</p>	<p>Alt A = NI Mitigation Measures 3.7-1a and 3.7-1b have been incorporated into Alternative B, C, D, and E to further reduce to the extent feasible the environmental consequences related to the degradation of scenic quality and visual character.</p>	<p>Alt A = NI Alts B, C, D, E = S</p>	<p>Mitigation Measure 3.7-1a: Mitigate for Changes in Visual Character from Pioneer Trail to Montreal Road This mitigation measure would apply to the transportation improvements included in Alternatives B, C, and D for the purposes of NEPA, CEQA, and TRPA. Realigning US 50 through the existing Rocky Point residential neighborhood between Pioneer Trail and Montreal Road would cause substantial changes in visual conditions. Realigned US 50 would be designed in accordance with all applicable design standards and guidelines and thus would exhibit a high level of visual quality; however, it would result in significant change in visual character on the neighborhood. The addition of noise barriers could also contribute to the adverse change in visual character. <u>To mitigate for this impact, TTD, TRPA, and FHWA shall incorporate feasible design treatments (e.g. landscaped berm to reduce visible wall mass, landscaped screening and wall texture and colors that blend with the surrounding environment) into the final project design.</u> Mitigation Measure 3.7-1b: Mitigate for Changes in Visual Character on Roadway Travel Unit #32 This mitigation measure would apply to Alternative E for purposes of NEPA, CEQA, and TRPA.</p>	<p>Alt A = NI Alts B, C, D, and E = Mitigation Measures 3.7-1a and 3.7-1b have been incorporated into Alternatives B, C, and D, but there are no other feasible mitigation, avoidance, or minimization measures that could further reduce to the extent feasible the environmental consequences related to scenic quality and visual character.</p>	<p>Alt A = NI Alts B, C, D, E = SU</p>

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 US 50/South Shore Community Revitalization Project EIR/EIS/EIS

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Summary

Table S-1 Summary of Resource Topics with Impacts and Avoidance, Minimization, and/or Mitigation Measures

Resource Topics/Impacts	Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation (by Alternative)		Avoidance, Minimization, and/or Mitigation Measures	Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)	
	NEPA	CEQA/TRPA		NEPA	CEQA/TRPA
<p>Adv = Adverse B = Beneficial LTS = Less than significant MU = mixed-use NA = Not applicable NAdv = Not adverse NI = No impact PS = Potentially significant S = Significant SU = Significant and unavoidable</p>					
<p>the Casino Core from Stataline Avenue to the north end of the Montbleu Resort Casino. Most effects on scenic quality from implementation of Alternatives B, C, and D would result in a mix of impacts either because no changes in visual conditions would occur, changes that would occur would be visually beneficial, or changes would be compatible with existing conditions. Proposals for the mixed-use development projects would have to undergo their own environmental review once they are defined and submitted for permitting, so it is unlikely that there would be a significant difference between the build alternatives with the transportation improvements alone or with the mixed-use development. Development of Alternative E would result in scenic quality impacts, because it would cause a decrease in the travel route rating for Roadway Travel Unit #32 due to a decline in scenic quality from the covering of the road with a pedestrian structure. Effects on visual character associated with Alternatives B, C, and D within the residential neighborhood between Montreal Road and Pioneer Trail and from Alternative E within the tourist core would result in the greatest impacts, because they would substantially degrade visual character in the immediate area and it would not be feasible to reduce the impact to a less-than-significant level for the purposes of CEQA and TRPA.</p>			<p>The elevated skywalk would be a massive, new, human-made feature within Roadway Travel Unit #32 and would be seen by motorists on US 50 traveling in either direction as they approach the skywalk and they travel beneath it. The visual dominance of the skywalk would cause a decrease in the travel route rating from 13.5 to 10 for Roadway Travel Unit #32, indicating an adverse effect on scenic quality. In views from the road, the skywalk would decrease the intactness and unity of views from the road, and the visual presence of the skywalk structure and its enclosure of the highway would substantially degrade the character of the roadway corridor as experienced by motorists. To mitigate for this impact, TTD, TRPA, and FHWA could modify the design the elevated skywalk feature to reduce its visual mass by converting it to more narrow overhead pedestrian walkway crossings only. This design modification would avoid impacts on the intactness and unity of views from the road, and would reduce or eliminate degradation of the character of the roadway corridor as experienced by motorists.</p>		
<p>Impact 3.7-2: Interference with or disruption of scenic vistas or scenic resources Vertical components of the project, such as supports for traffic signals and light standards, have insufficient mass to substantially disrupt scenic views. However, large objects, depending on their location and the location from which they are viewed, could interfere with scenic views. Alternatives B, C, and D include construction of a pedestrian bridge over realigned US 50 (on Lake Parkway) near the California/Nevada state line. Also, in the neighborhood east of Pioneer Trail, sound walls may be</p>	<p>Alt A = NI The design features of Alternatives B, C, and D would avoid or minimize the impacts on scenic vistas and scenic resources such that no additional mitigation measures are needed or feasible to implement; Mitigation</p>	<p>Alt A = NI Alts B, C, D = LTS Alt E = S</p>	<p>Mitigation Measure 3.7-2: Mitigate for Decrease in Visual Quality Rating for Scenic Resources 32.1 and 32.3 This mitigation measure would apply to Alternative E for purposes of NEPA, CEQA, and TRPA. The proposed skywalk structure that would be constructed as part of Alternative E would have the potential to effect views of scenic vistas and scenic resources, by interfering with views of scenic resources 32.1 and 32.3. The skywalk would cause a</p>	<p>Alts A, B, C, D = NA Alt E = Mitigation Measure 3.7-2 has been incorporated into Alternative E, but there are no other feasible mitigation, avoidance, or minimization measures that could further reduce to the extent feasible the</p>	<p>Alt A = NI Alts B, C, D = LTS Alt E = SU</p>

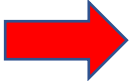
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This scenic assessment is somewhat correct for the Main Street program not necessarily the Event Center. At best, scenic assessment of the Event Center structures imposing size versus a parking lot is subjective. Again, an EIR/EIS would be more appropriate for the Event Center as the analysis would further explore scenic where the Environmental Assessment isn't required to provide this much detail for scenic assessment.

This information is from the Environmental Assessment for the Event Center

Page 6 of scenic assessment



As part of the 2012 TRPA RPU process, TRPA identified potentially significant scenic impacts related to increasing building heights in community centers (including the High Density Tourist District). TRPA adopted scenic mitigation measure 3.9-1b to require no net increase in visual prominence for redevelopment of existing high-rise structures in the High Density Tourist District. Because the Events Center project does

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not include redevelopment of an existing high-rise structure, mitigation measure 3.9-1b does not apply to the Project. The following standards are applicable to the scenic analysis of the Events Center project.

- The Events Center is not subject to the scenic findings in TRPA Code Section 37.7 – specifically Sections 37.7.16 (Finding 16 – Three- or Four-Story Buildings in Town Centers and Three- to Six-Story Buildings in the Regional Center) and 37.7.17 (Finding 17 – Redevelopment in High Density Tourist District within Existing Visual Prominence) and the findings identified therein do not apply to the proposed Events Center in the High Density Tourist District of the South Shore Area Plan.
- Maximum permissible height for a new Events Center building in the High Density Tourist District of the South Shore Area Plan is 95 feet.
- The Events Center is subject to the 80/20 standard set forth in Section 2.1.17 of the TRPA Design Standards and Guidelines. Section 2.1.17 of the Design Standards and Guidelines states "The travel route of Hwy 50 has a 'canyon effect' because the existing tower structures are located too close together with inadequate setbacks. Within a given property, eighty percent of the buildings fronting Hwy 50 shall not exceed 56 feet in height when an existing building or buildings are being replaced within 100 feet of the right-of-way. Twenty percent of the building or buildings frontage may be constructed to a maximum height of 95 feet."

https://www.trpa.org/wp-content/uploads/H_Events_Center_Scenic_Evaluation_report.pdf

So, the applicant found loop-holes. Scenic analysis is always somewhat subjective. So, a flat parking lot versus a high-rise that clearly is a visual change from the existing condition doesn't have to be analyzed. And by-the-way the new event center does block mountain views headed toward SR 207

Scenic Roadway Unit 32 (Casino Area)

The views along U.S. Highway 50 in Roadway Unit 32 (Casino Area) are dominated by the views of high-rise casino towers, resorts, restaurants, and numerous other commercial and office uses (Wagstaff and Brady 1983). The Visual Massing Study included as Attachment A simulates the proposed Events Center development as viewed from numerous U.S. Highway 50 and Lake Parkway viewpoints. Viewpoints include U.S. Highway 50 looking north, U.S. Highway 50 looking south, Lake Parkway looking east and Lake Parkway looking west. Each viewpoint was selected to represent proposed conditions approximately 300 feet from the Events Center structure, and for several viewpoints documents conditions with and without the proposed U.S. Highway 50/South Shore Community Revitalization Project.

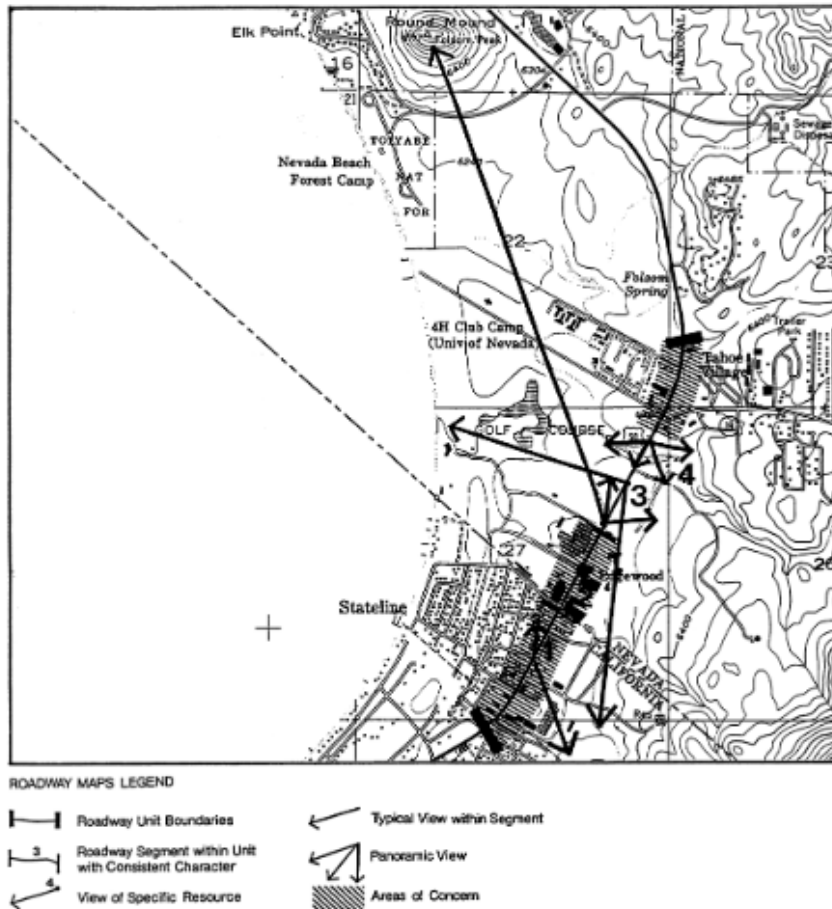
Roadway Unit 32 is approximately 7,000 feet long and categorized as “urban visual environment” and an area of concern in the SQIP. As stated in TRPA Code Chapter 66.2.2.A, “Urban scenic highway corridors are generally urbanized areas where man-made development is the dominant visual feature. When viewed from areas outside of the urban corridor, man-made developments shall blend into the natural environment.” The areas of greatest concern with respect to the unit’s scenic quality are the two existing concentrations of commercial development, which comprise the majority of the unit. The largest and most intensely developed area consists of the entire southern half of the unit (City of South Lake Tahoe), extending from the casinos south to the junction of U.S. Highway 50 with Pioneer Trail. The overall effect is a visually cluttered and confusing environment that fails to take advantage of the scenic value of its natural setting (TRPA SQIP 1989). The 2015 TRPA Threshold Evaluation and previous iterations document many improvements to this part of Unit 32, most recently the improvements associated with the Chateau



One could deduce from this statement “The overall effect is a visually cluttered and confusing environment....” By adding the large-scale Event Center further clutters the visual acuity.

redevelopment along U.S. Highway 50, and remodel of the commercial uses at the U.S. Highway 50/Pioneer Trail intersection. Recent improvements noted within the other commercially concentrated area (Douglas County casino core) of the unit include the Hard Rock Casino renovations, including new signage, paint (darker colors), entryway/outdoor gathering space and landscaping. Added together, these improvements increased the “man-made features” threshold criteria score from 3.5 to 4.5 as reported in the latest TRPA Threshold Evaluation (2015) which assigned a threshold composite score of 14.5 for Roadway Unit 32. The Unit is in nonattainment and must increase its composite score to 15.5 or above to achieve attainment. Scenic quality travel route ratings are listed in Table 1 and Figure 9 provides a map of Roadway Unit 32 (Casino Area).

Figure 9: Roadway Unit 32 (Casino Area)



The SQIP recommends upgrades to overall architectural quality and variety, increased building setbacks to avoid the tunnel-like effect of strip development, reduced prominence of the automobile and facilities designed for the automobile, improved signage consistent with TRPA Code standards, improved landscaping to better integrate existing development, and reductions in night lighting. Regarding building height in the casino core, the SQIP states “When considering visual effects of building heights from within

Non-attainment of Unit 32.

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting
Agenda Item No. XII.A Main Street Management Plan also related to Tahoe South Event Center

Furthermore, this statement applies “The overall effect is a visually cluttered and confusing environment...” Add “avoid the tunnel-like effect” of the large-scale Event Center more clutter. No real architectural changes have been made by the outward appearance of the Casinos.

Power lines gone are an improvement but adding the large-scale Event Center “clutters” the scenic acuity.



Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting
Agenda Item No. XII.A Main Street Management Plan also related to Tahoe South Event Center

This is photo simulation with depiction of the Event Center in this scenic report showing the blockage of a mountain view as seen while driving. Nice the light standards are gone but so is the mountain view.





3D.fx

Tahoe South Event Center
Southbound Hwy. 50

VISUAL SIMULATION
Proposed Conditions
(with roundabout)

1612 Sunset Ave • Chico, CA 95926 • 530.682.0335 • info@3DfxDesign.com

AEC: Visual Assessments • Visual Simulations • GIS • CEQA • NEPA

Back to funding sources. This depiction shows the proposed roundabout. Please identify secured and unsecured funding sources for the round-about.

<https://www.trpa.org/wp-content/uploads/Agenda-Item-No.-XII.A-MSMP-Staff-Report.pdf>

The Staff report dated March 18, 2020 is 3 pages long and no updated information on funding has been provided. The Tahoe Transportation District is lead. Please have staff provide funding status as requested.

TTD should be able to provide information to staff before the meeting or be available to answer questions ant the meeting.



Mail
 PO Box 5310
 Stateline, NV 89449-5310

Location
 128 Market Street
 Stateline, NV 89449

Contact
 Phone: 775 588 4547
 Fax: 775 588 4527
 www.trpa.org

STAFF REPORT

Date: March 18, 2020
 To: TRPA Governing Board
 From: TRPA Staff
 Subject: Update on the Main Street Management Plan and Other Components of the US 50/South Shore Community Revitalization Project

Summary and Staff Recommendation:

This staff report provides a brief update on the Main Street Management Plan and the South Shore Community Revitalization Project. This item is for informational purposes and no action is required.

Project Description/Background:

Prior to permit acknowledgement of Phase 1 of the South Shore Community Revitalization Project (SSCRP), the Main Street Management Plan (MSMP) must be developed and adopted by the TRPA Governing Board. The MSMP will provide a plan for the transition of the Main Street area after its conversion from a five lane US highway to a space which enhances the business environment, visitor experience and environmental sustainability. TRPA, as a partner agency and in coordination with the Tahoe Transportation District (TTD), is the lead in developing the MSMP. TTD is the lead in developing and completing three components of the MSMP and the remaining project conditions/components of the SSCR, as shown in the table below.

Project Condition/Component	Lead Entity
Main Street Management Plan must be approved by TRPA before proceeding with roadway realignment	TRPA
<ul style="list-style-type: none"> • Main Street Design and Wayfinding • Main Street Management Plan Transit Circulator • Main Street Management Plan Property and Improvements Ownership, Management, and Funding • Parking Management 	TRPA TTD TTD TTD
Replacement Housing - 109 Transit Oriented Development (TOD) Residential Units (102 low income, 7 moderate income).	TTD
<ul style="list-style-type: none"> • 76 units shall be constructed prior to displacement of any residents for any part of the SSCR. • No less than 33 units shall be constructed before or concurrent with the roadway realignment. 	

AGENDA ITEM NO. XII.A



Rocky Point Neighborhood Amenities Plan	TTD
US 50 Engineering and Construction Plans	TTD
Secure Project Funding	TTD

TRPA Status Report

- See the update on the Transit Circulator below.

TTD Status Report:

Main Street Management Plan Transit Circulator

- TTD and TRPA staff collaborated to prepare a recommendation to include in both the Main Street Management Plan and as a condition of approval for the South Tahoe Events Center project. It is consistent with the draft Regional Transportation Plan concepts for this area and includes both fixed route transit service along what will be the “Main Street” (a.k.a., the former US 50) and on-demand micro-transit service to the area including and surrounding the South Shore Community Revitalization Project and Main Street Management Plan. That plan will be included as part of the final version of the Main Street Management Plan.

Main Street Parking Management Plan

- TTD held a day-long parking symposium in February to kick off the Parking Management Plan. The symposium focused on the basics of parking for stakeholders and interested parties from both the north and south shores. Julie Dixon of Dixon Consulting, the subcontractor assisting with the plan, began the morning with a “Parking 101” presentation where she explained the benefits of parking management systems and how to build one from the ground up. Next, Matt Eirman with the City of Sacramento presented lessons learned on tiered level parking, on-demand parking, special event parking, and how to partner with private parking operators to provide a seamless customer service experience. The afternoon session included a “Magic Wand Exercise” where attendees were asked to list one item they would change regarding parking in their area. With about fifty attendees, this grew into a broader conversation about transportation challenges in the basin, of which parking is one component. Popular wishlist items from attendees included better parking wayfinding and technology, on demand pricing, increasing or decreasing parking inventory, putting more resources into local and regional transit, transit intercept lots, and public/private partnerships to support transit. Dixon Consulting will use the comments received as a starting point for the Parking Management Plan.

Replacement Housing

- TTD and Pacific Development Group are making progress on the amendment to the Tourist Core Area Plan. The amendment incorporates three parcels adjacent to Ski Run Blvd and Pioneer Trail into the existing area plan and allows for a 17 unit increase in multi-family residential density, allowing approximately 77 multi-family units to be built. The City’s Planning Commission recommended approval of the amendment on February 20, 2020, the City Council approved the amendment on March 10, 2020, and the TRPA Advisory Planning Commission recommended approval on March 11. The City and TRPA staff will present the draft amendment for recommendation for approval to the TRPA’s Regional Plan Implementation Committee (RPIC) on March 25, 2020 and to the full Governing Board for approval on April 22, 2020.

AGENDA ITEM NO. XII.A

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting
Agenda Item No. XII.A Main Street Management Plan also related to Tahoe South Event Center

Contact Information:

For questions regarding this agenda item, please contact Alyssa Bettinger, Associate Planner, at (775) 589-5301 or abettinger@trpa.org.


AGENDA ITEM NO. XII.A

I stated with 2015 now fast-forward to January 2019 Revised March 2019

http://www.trpa.org/wp-content/uploads/Main-Street-Management-Plan-Work-Plan_REVISED_051519.pdf

In conjunction with the South Shore Community Revitalization Plan

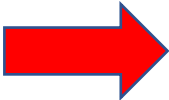
Introduction¹



This Main Street Management Plan (MSMP) covers the bi-state South Shore corridor from which US Highway 50 will be relocated, stretching from the intersection with Lake Parkway in Nevada to just beyond the intersection with Pioneer Trail in California. The relocation of US Highway 50 presents an opportunity to create a "Main Street" for the South Shore that will create a world-class space for people, enhance the environment for those visiting surrounding properties, and provide for an experience that matches the unique natural environment at Lake Tahoe. The MSMP will address plans for surrounding properties and will include a plan for a variety of transportation modes such as pedestrians, bicycles, transit, scooters and other personal mobility devices and vehicles for business, emergency, and service access. It will improve the visitor experience, the business environment, multi-modal transportation, and environmental sustainability.

The MSMP will define the configuration, operations, and management of the former US 50 corridor to achieve the goals of these plans: Regional Plan, 2017 Linking Tahoe: Regional Transportation Plan, South Shore Vision Plan, Tourist Core and South Shore Area Plans, Linking Tahoe: Lake Tahoe Basin Transit Master Plan, and the Linking Tahoe: Corridor Connection Plan. The goals of those plans include the above-stated purpose of this MSMP, encouraging the shifting of through traffic away from the Main Street corridor to the newly constructed Highway in order to facilitate multi-modal business access as well as achieve a pedestrian, bike, and transit-oriented corridor, reduce vehicles miles travelled, orient transit circulation around the existing transit center as a multi-modal mobility hub, define appropriate uses of the Main Street public space and enhance the area for pedestrian-oriented activities and events. In addition, the MSMP will include wayfinding and performance management components as part of a comprehensive plan for the new Main Street. The MSMP will be completed in coordination with other components of the South Shore Community Revitalization Project (SSCRP) listed in Appendix B.

The second component of the MSMP, a wayfinding implementation plan, will be developed to orient visitors within a space or to navigate from place to place. The MSMP wayfinding implementation plan will be a comprehensive wayfinding system for active transportation, transit, parking, visitor information centers, recreation opportunities, interpretive opportunities and other information to inform travelers on how to reach key destinations and connect with other transportation modes. The wayfinding implementation plan will also include (1) a logic and structure for the wayfinding system, (2) a list of key destinations to be highlighted, (3) type, scale, saturation, and specific location of wayfinding elements, and (4) guidelines for implementation and costs of an effective wayfinding system.



As successful planning and implementation is performance based, the MSMP will also include performance standards, monitoring protocols, and a refinement strategy as a third component specific to this project and location. The MSMP and project implementation will use a comprehensive performance standard system to determine appropriate infrastructure, monitor implementation effectiveness, and to adaptively manage refinements as needed. The performance standards, monitoring protocol, and refinement procedures will be derived from existing regional policies and guidelines as well as site specific standards to be determined during the MSMP's development. Existing guidelines implement the 2017 Linking Tahoe: Regional Transportation Plan, the Lake Tahoe Region


¹ This introductory language is a summary of and subject to Condition 3.B of TRPA Permit EIPC2018-0008 for the Main Street Management Plan. Condition 3.B is included in Appendix A.

Funding is a KEY ISSUE to the Effectiveness of the Adaptive Management Plan.

Appendix A: Main Street Management Plan Requirements

TRPA Permit (EIPC2018-0008) Condition 3.B

1. Main Street Management Plan



Prior to permit acknowledgement of Phase 1 of the Permit, TTD and/or a partner agency shall develop and have adopted, with appropriate partners and funding as outlined herein, a Main Street Management Plan (Plan) for the transition of the Main Street area after its conversion from a five lane US highway.

The purpose of the Plan is to create a complete, multi-modal street environment which enhances the businesses environment, the visitor experience and environmental sustainability. The Plan will define the configuration, operations, and management of the newly converted Main Street corridor segment that will achieve the goals of adopted plans: Regional Plan, Regional Transportation Plan, South Shore Vision Plan, and Tourist Core and Casino Core Area Plans. The goals of those plans include the above-stated purpose of this Plan, encouraging the shifting of through traffic away from the main street corridor to the newly constructed Highway in order to facilitate multi-modal business access as well as achieve a pedestrian, bike, and transit-oriented corridor, reduce vehicles miles travelled, orient transit circulation around the existing transit center as a multi-modal mobility hub, define appropriate uses of the Main Street public space, and enhance the area for pedestrian-oriented activities and events.

The Plan shall be developed with a stakeholder working group including members from local businesses and property owners, the Lake Tahoe Visitor's Authority, Tahoe Douglas Visitor's Authority, South Tahoe Alliance of Resorts, the Lake Tahoe South Shore Chamber of Commerce, the League to Save Lake Tahoe, one state-level appointee to the TRPA Governing Board from each state or their designee, community organizations, local governments, and transportation and public safety departments from both States. TRPA Governing Board appointees will be co-chairs of the stakeholder working group. It is acknowledged that it will be important to inspire and incorporate enhanced business opportunities and economic vitality for the success of this Plan. The Plan shall be produced in partnership with, and submitted to, TRPA, Douglas County, the City of South Lake Tahoe, and TTD, and approved by the TRPA Governing Board prior to permit acknowledgement of Phase 1 and the commencement of construction of the approved US 50 highway alignment.

The area of the Main Street project will include, but may not be limited to, the current alignment of US 50 and property fronting it between the proposed roundabout at Lake Parkway and where the proposed new alignment connects to the current alignment southwest of Park Avenue near Pioneer Trail. The area of the Main Street Management Plan will include the area of the Main Street project as well as the adjacent areas necessary to address the items included in the plan.

The Plan shall include an implementation schedule and the following items:

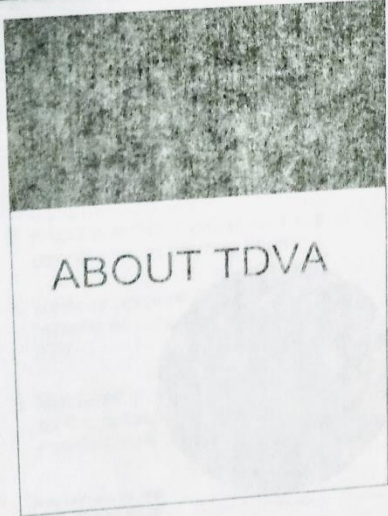
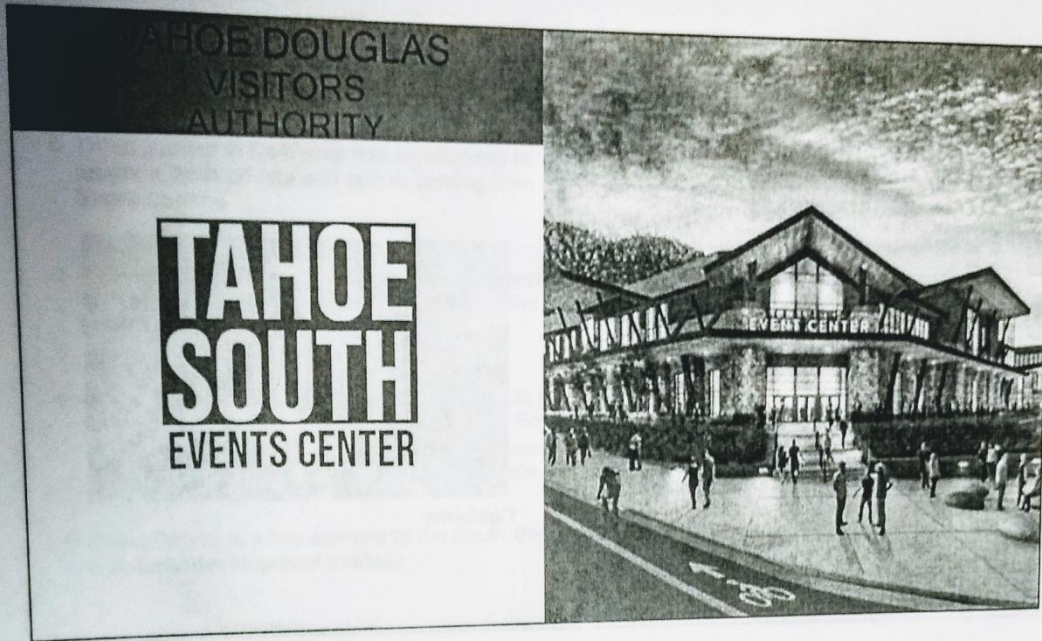
1.1. Introduction

This section will include the purpose and objectives of the management plan; how it is to be used by TRPA, TTD, and other organizations in the overall South Shore Community Revitalization Project (SSCRP) implementation process; the Main Street project area; and how the plan document is organized. [TRPA lead, TTD support]

And/or Partner agency ????? Douglas County ????? TRPA ????? Need up to date funding secured and unsecured. Yes, I'm repeating myself.

Presentation to the Nevada Legislative Oversight Committee for TRPA (and Marlette Lake Water System) on March 12, 2020

3/11/2020

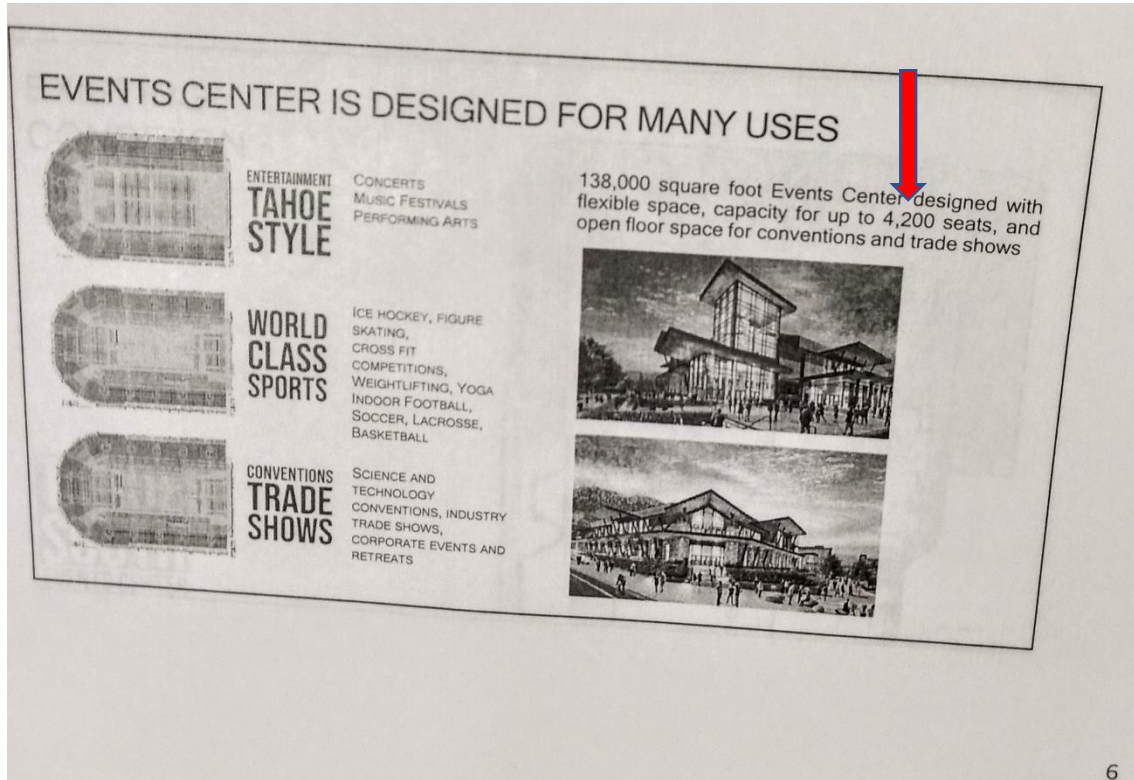


1997: TDVA Act (NRS 496)

- › To promote tourism within the Tahoe Township
- › To design, plan, and operate a convention center

2019: TDVA Act amended

- › TDVA authorized to plan, construct and operate a multi-use events center (AB 98)
- › \$5 per night surcharge on room nights within the Tahoe Township (SB 461)
- › TDVA authorized to issue municipal bonds to fund the planning, construction and operations of the events center (SB 461)



Please have the applicant of the Event Center explain the potential design constraints and has the design been reduced to 4200 seats for concerts? The applicant mentioned to the Senators (Ratti, Parks, Kleckhefer), Assemblywomen (Peters and Jaurequi), Assemblyman Kramer, League Counsel and policy analyst and members of the public that 6000 seats was determined to not be viable with design constraints. Applicant hoping for 5000 seats where the presentation states 4200.

I'll close as I've gotten my point across sufficiently. There are too many unknown funding issues before Douglas County should support and commit \$34.25 million in taxpayer (RDA) dollars.

Burden of Proof: Many Unknowns

There are many e-mails, a press release, etc. circulating about the upcoming March 25, 2020 Tahoe Regional Planning Agency Governing Board meeting.

The public and agencies need to be assured that all meetings have had proper notification: on-line, in newspapers, at libraries, post offices, etc. about the use of webinar for the March 25, 2020 Tahoe Regional Planning Agency Governing Board meeting.

Please provide a paper trail of where the meetings and webinar information were posted by date and location. And what the requirement for postings are: i.e. how many days for each type of posting.

I visited the TRPA web on March 19 and found instructions for the webinar.

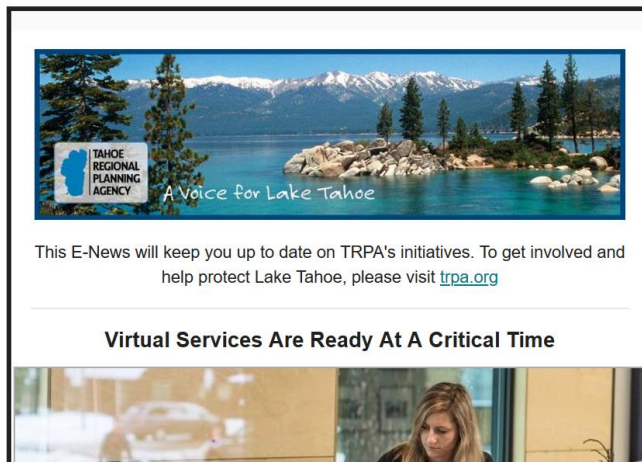
I am not sure and do not recall finding information about webinar in Tahoe Daily Tribune or other newspaper outlets.

Is there a possibility that this meeting should be cancelled due to improper noticing?

I have stated and will continue to state this is extraordinary times that require extraordinary measures but rules are rules and processes must be followed.

 Jeff Cowen <jcowen@trpa.org>
To: tahoellie@yahoo.com

 Fri, Mar 20 at 4:06 PM





Mail
PO Box 5310
Stateline, NV 89449 5310

Location
128 Market Street
Stateline, NV 89449

Contact
Phone: 775-588-4347
Fax: 775-588-1547
www.trpa.org

MEMO

To: TRPA Governing Board Members and interested Members of the Public
From: TRPA Staff
Subject: March 25 Governing Board Meeting to be Conducted on Virtual Platform
Date: March 18, 2020



TRPA is concerned for the health and safety of community members, our staff, and Governing Board and Advisory Planning Commission members. Amid rapidly evolving circumstances, the agency must consider its obligation to continue work while doing our part to slow the spread of the novel Coronavirus.

In addition to virtual technology being used for internal operations, TRPA will utilize technology to hold the March 25 Governing Board meeting. Any Governing Board member or interested member of the public will be able to participate and observe the meeting remotely without coming to a physical location. **In-person attendance will not be a part of TRPA public meetings under the current recommendations from state and local agencies.**

Ways to provide input to the TRPA Governing Board:

Prior to the Board Meeting:

- Submit written comments of any length in advance of the meeting. Written comments received by 5:00 pm March 24 will be included as part of the record. Please email comments on the Tahoe South Events Center to Paul Nielsen, pn Nielsen@trpa.org.

The Day of the Board Meeting (March 25):

- Provide online comments during the meeting through the public comment form available at <https://www.trpa.org/governing-board-documents-march-25-2020/>. In accordance with TRPA rules and procedures, public comment will be allowed at specific points during the live meeting. Comments submitted during the meeting will be read into the record by a member of TRPA staff. Individuals will have three minutes (2,500 character maximum) of their comment read aloud into the record. Organizations will have 5 minutes (4,165 characters maximum).

Governing Board and community members will use the platform GoToWebinar. Visit the service provider's website, <https://www.gotomeeting.com/webinar>, in advance of the meeting to prepare your system to connect to the March 25 meeting (webinar). The link to connect to the meeting as well as the online comment form will be posted on the Meetings and Notices page of

the TRPA website <https://www.trpa.org/governing-board-documents-march-25-2020/> the day of the meeting.

TRPA sincerely appreciates the patience and understanding of everyone concerned as we make accommodations to conduct business using best practices to protect public health. The agency values public input as an integral part of its practices and will work to ensure safe and effective options are available at public meetings.

For more information about the Governing Board meeting or TRPA's response to the COVID-19 crisis, please contact Public Information Officer Jeff Cowen jcowen@trpa.org or (530) 308-5539.

This was provided to me by TRPA staff on March 20, 2020 along with a flyer.

<https://www.trpa.org/governing-board-documents-march-25-2020/>

You are here: [Home](#) / [Governing Board Meeting Materials](#) / Governing Board Documents March 25, 2020

GOVERNING BOARD DOCUMENTS MARCH 25, 2020

March 18, 2020 By [Mambler](#)

[March 25, 2020 Governing Board Agenda](#)

[March 25, 2020 Governing Board Packet](#)

[Virtual Meeting FactSheet](#)

[Consent Calendar Item No. 1 APC Lay Appointment Staff Report](#)

[Consent Calendar Item No. 2 Legal Committee Appointment Staff Report](#)

[TMPO Consent Calendar Item No. 1 Amendment 2 Overall Work Program Staff Report](#)

[TMPO Consent Calendar Item No. 2 2021 Active Transportation Program Guidelines Staff Report](#)

[Agenda Item No. II Deviation from Rules of Procedure Staff Report](#)

[Agenda Item No. IX.A Tahoe Douglas Visitor's Authority Tahoe South Event Center Staff Report](#)

[Agenda Item No. XII.A Mainstreet Management Plan Staff Report](#)

[RPIC Agenda Item No. 4 VMT Threshold Update Workplan Staff Report](#)

[February 26, 2020 Governing Board Minutes](#)

[January 22, 2020 RPIC Minutes](#)



Filed Under: [Governing Board Meeting Materials](#)

MARCH 25 TRPA GOVERNING BOARD MEETING WILL BE ONLINE

Under current recommendations from state and local agencies, TRPA will utilize technology to hold the March 25 Governing Board meeting without in-person attendance.

- **Attend Virtually**

Anyone can use the platform GoToWebinar the day of the meeting to attend and participate. Visit the service provider's website, <https://www.gotomeeting.com/webinar> to make any necessary preparations. On March 25, visit <https://www.trpa.org/governing-board-documents-march-25-2020/> for the link to the webinar.

- **Participate Virtually**

A live public comment form will be posted the day of the meeting to <https://www.trpa.org/governing-board-documents-march-25-2020/>. Brief comments submitted during the meeting will be read into the record.

- **Comment Early**

As always, written comments of any length can be submitted by March 24, 5 p.m. to be entered into the record. Email comments on the Tahoe South Events Center to:
Paul Nielsen, pnielsen@trpa.org.



This flyer/notification has no date but as stated was provided to me March 20, 2020.

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting



● Ellie <tahoellie@yahoo.com>

To: John Marshall, Joanne Marchetta, Julie Regan
Cc: Marja Ambler, Bill Yeates TRPA GB, Jeff Cowen, Cindy Gustafson

Mon, Mar 16 at 6:31 PM



Julie,

Appreciate the quick response. Anxiously await the press release and response to me.

Best, Ellie

On Monday, March 16, 2020, 5:54:40 PM PDT, Julie Regan <jregan@trpa.org> wrote:

Hello Ellie,

Thank you for your inquiry. It was terrific seeing you at the Nevada Legislative Oversight Committee meeting last Thursday.

We are working diligently to pivot to virtual operations at the Agency including the March 25 Governing Board meeting. We will have more details out tomorrow including a press release. We'll be sure to forward.

Thanks and be well.

Julie

From: Ellie <tahoellie@yahoo.com>

Reply-To: Ellie <tahoellie@yahoo.com>

Date: Monday, March 16, 2020 at 5:27 PM

To: John Marshall <jmarshall@trpa.org>, Joanne Marchetta <jMarchetta@trpa.org>, JULIE REGAN <jregan@trpa.org>

Cc: Marja Ambler <mambler@trpa.org>, Bill Yeates TRPA GB <byeates49@gmail.com>, Jeff Cowen <jcowen@trpa.org>, "Cindy Gustafson" <cindygustafson@placer.ca.gov>

Subject: Upcoming meetings

Hi All,

Respectfully, I suspect the Tahoe Regional Planning Agency is contemplating upcoming meeting cancellations as many of the local jurisdiction have published meeting cancellations as of today.

PLEASE ADVISE at your convenience if the March 25, 2020 Governing Board meeting is slated to be cancelled.

Regards, Ellie Waller

When might the webinar information been posted in the newspapers?

Ellie Waller Additional Public Comment for the Record March 25, 2020 TRPA Governing Board Meeting

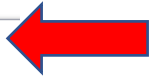
• RELEASE: TRPA TAKING STEPS TO PREVENT THE SPREAD OF COVID-19

Yahoo/TRPA Iss... ★



• Jeff Cowen <jcowen@trpa.org>
To: TRPA

Fri, Mar 13 at 4:05 PM ★

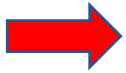


For Immediate Release:

Stateline, NV – The Tahoe Regional Planning Agency (TRPA) is taking responsible steps to prevent and control the spread of the novel coronavirus COVID-19, the Agency announced today. The following steps have been implemented, however further actions may be taken as conditions and official recommendations may change:

- Limiting non-essential meetings.
- Ensuring public comment at meetings can be given remotely.
- Monitoring employee health and sanitation throughout its operation.
- Implementing official recommendations from the National Centers for Disease Control and Prevention and local health care providers.
- Ensuring electronic permitting and document request services are running smoothly.
- Using technology to allow staff to work remotely if needed and to collaborate via video conference.
- Remaining prepared for changing recommendations and methods to prevent the spread.

"The steps we are taking are intended to provide the highest level of care for our staff, customers, partner organizations, and the community," TRPA Executive Director Joanne Marchetta said.



The March 25 TRPA Governing Board meeting is currently scheduled to go forward, the Agency said. Community members interested in attending TRPA meetings should stay up-to-date with possible changes at www.trpa.org.

No mention of webinar

The Events Center agenda item should be tabled and rescheduled until the Tahoe Regional Planning Agency (TRPA) Governing Board members weigh-in on this project as anticipated to be heard at their March 2020 meeting. Many of the Governing Board members expressed concerns about the VMT issues.

This money WHICH SHOULD BE USED for the benefit of LOCAL police, fire protection, schools countywide, etc. is now being reserved largely for the benefit of the multi-billion-dollar mega corporations that largely make up the casino corridor, and must be reconsidered. Why these huge corporations would need to take \$110,000,000 + from the people of Douglas County is beyond my comprehension!

With the passing of Senate Bill 461 in July 2019, a \$5.00 tourism surcharge is being collected to fund such things like the event center. This is a sufficient DEDICATED funding source already being collected in the tune of approximately \$4.4 million per year/\$132 million over 30 years.

A vast majority of Douglas County's residents live in the valley and participation at both meetings being held at the lake is less likely and to obviously point out on back-to-back days. The, yet to be released, TRPA agenda will surely be packed as well as the BOCC agenda thus community members again will be less likely to wait hours in these marathon meeting to have their voices briefly heard.

The BOCC refused to put this disastrous taxpayer rip-off to a vote of the people at the June 20, 2019 Board meeting. With the potential upcoming approval, taxpayers may be holding the bag for millions of dollars instead of the multi-billion-dollar mega corporations that should be footing the bills.

I am happy to say a citizens group is circulating referendum petitions to put this issue on the ballot for this year's elections. Every registered voter should sign this non-partisan petition so all are equally heard from and not just the minority that attend meetings.

I was not surprised that the January 22, 2020 meeting reflecting 14 pages of comments from the Dec 2019 meeting came mostly from supporters (Lisa Deleon, Destination Tahoe Meetings & Events, Corinna Osborne, Edgewood, Tom Fortune, Heavenly Resort, John Cahill, Hard Rock, Stacy Noyes, Lakeside Inn & Casino, John Packer, Harrah's and Harvey's, Carol Chaplin, Tahoe Douglas Visitors Authority, Jerry Bindel, Forest Suites Resort, Bill Cottrell, Lake Tahoe Resort Hotel, etc.)

Clearly this proposed large-scale event center, with possibility of significant and unavoidable impacts, and assumption versus analysis-based (on traffic alone) should require this project to be an Environmental Impact Study (EIS) and not the less stringent/less analysis required Environmental Assessment (EA).

The EA has not sufficiently analyzed cumulative traffic impacts. An EIS must be drafted to ensure environmental impacts are properly mitigated to the fullest extent possible and impact studies conducted for real-time traffic cumulative impacts of existing conditions today.

VMT knows NO BOUNDARIES. Statelines are just that, a line, which VMT crosses 24/7. VMT is a huge consideration that cannot be taken lightly.

Is the LSC traffic analysis adequate based on Governing Board Member comments and Peer Review? Proposed paid parking requirements and microtransit usage are only assumptions when stating achievement of reduced VMT.

(GB Member) Jim Lawrence “As the project moves forward, it’s important in the context of Tahoe and this project to be able to articulate in the analysis whatever the assumptions are regarding the VMT reduction with the pad parking, it needs to demonstrate how the analysis was Tahoe specific as opposed to general nationwide industry standard. Mr. Feldman agreed and said that is a tough order.”

(TRPA staff member) Mr. Nielsen “said the analysis does include a general reduction for paid parking. Then there are local factors that are considered which doesn’t have a lot of data about local factors. It does include an adjustment for local factors. The peer review said that needed some refinement.”


(GB Member) Mr. Shute “said as co-chair of the stakeholder group doing Main Street Management Plan, they could be done in a few months. And the fact that they won’t be is not because of their work. Mr. Shute said the key for him on this project is offsetting the VMT. There will be people coming in the shoulder seasons that wouldn’t be here otherwise and that will generate traffic. The link there is the Main Street Management Plan and the parking management plan that are not done.”

The approval of this EA (which should be an EIS) should come back to the Governing Board once the Main Street Management Plan is completed in a couple of months to ensure consistency and ability for adaptive management plans to be drafted.

Within the boundary of the Event Center project area, pedestrian-oriented development along Highway 50 would include increased building setbacks compared to existing developments, a visible event lawn, improved landscape elements and street trees, new pedestrian amenities, and a unified façade, oriented toward the street and transit facilities. Overhead utilities along the east side of U.S. Highway 50 (at the Lake Parkway intersection) would be removed as part of the adopted South Shore Community Revitalization Project (i.e., Loop Road), or if that project is not constructed, would be completed within the Event Center project area and immediately across Lake Parkway as part of the proposed project. Based on these elements and including the proposed building design, materials, and colors, the EA

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concludes there may be an incremental improvement to the applicable roadway travel route threshold rating and no mitigation is required. Conditions of approval will require:

- 
1. Coordination with the Main Street Management Plan streetscape design to ensure consistency in the type and location of pedestrian amenities.

Gavin Feiger, League to Save Lake Tahoe “said they’ve heard a lot of comments today about economics. With a six page staff report it’s hard for them to gauge the environmental impacts of the project. They don’t have a stance yet but are looking forward to seeing the traffic analysis and the assumptions that went into that along with the peer review.... There’s some great stuff they’ve seen in the brief materials but looking forward to seeing the environmental analysis and a more extensive analysis depending on what that comes out with.”

In the United States, there was continuous growth in VMT in all 50 states until 2008 when growth leveled off due to the economic downturn. **An upward growth trend had returned by 2014.** There are various means of forecasting VMT available. The literature revealed three primary types of data-based methods for estimating and forecasting VMT: •Traffic-count-based methods. •Socioeconomic-data-based methods. •Travel demand forecasting models. The literature also revealed several quantitative and statistical techniques for estimating and forecasting VMT. These include trend/growth factor methods, time series analysis, and regression analysis. The end users of VMT estimates and forecasts typically include state departments of transportation, state environmental agencies, transportation/environmental consultants, and regional planning organizations. These agencies use VMT primarily for transportation planning and emission analyses.

<https://static.tti.tamu.edu/tti.tamu.edu/documents/PRC-15-40-F.pdf>

The CA AG weighed-in on VMT **September 2016**. The first six pages of 19 should provide enough information to ascertain the severity of the VMT issues back in 2016. Now add cumulative impacts of all the projects approved and/or built since this letter was issued.

KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE



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September 6, 2016

VIA OVERNIGHT COURIER

Paul Thompson, Interim Agency Director
Placer County Board of Supervisors
3091 County Center Drive
Auburn, CA 95603

RE: Martis Valley West Specific Plan Environmental Impact Report

Dear Mr. Thompson and Supervisors:

Our office has reviewed the environmental impact report (EIR) for the Martis Valley West Specific Plan (the Project) and respectfully submits the following comments. We request that you consider our comments and address them prior to certifying the EIR. The California Attorney General has a longstanding interest in the protection of Lake Tahoe as a state and national treasure. The Attorney General's interest dates back over four decades (see, e.g., *California ex rel. Younger v. Tahoe Regional Planning Agency* (9th Cir. 1975) 516 F.2d 215) and is as recent as our involvement in the 2012 Tahoe Regional Planning Agency (TRPA) Regional Plan Update and our submission of comments on August 9, 2016, regarding the proposed Squaw Valley Specific Plan, also pending before Placer County. Our concerns with the EIR for the Project are similar to the concerns we expressed with regard to the EIR for the Squaw Valley Specific Plan.

The Project sets forth a 20-year framework for the residential development and open space preservation of two parcels totaling over 7,000 acres. The Project is located in the Martis Valley near the Northstar Resort and the Lake Tahoe Basin (basin). The Project is located just outside of, but adjacent to, the Lake Tahoe Basin, and its entrance lies on State Highway 267, the gateway to Tahoe's North Shore. While we applaud the Project's open space preservation, because of the proximity of the proposed development to Lake Tahoe, we are concerned about the impacts the development will have within the Tahoe Basin. We are particularly concerned with the Project's resulting increases in vehicular use and traffic within the basin. The traffic issues have two components – (1) level of service impacts to specific roadway sections within the basin; and (2) increases in vehicle miles travelled and daily vehicle trips within the basin, which in turn have impacts on air and water quality and may limit the ability of environmentally beneficial redevelopment projects in the basin to go forward. These impacts are especially a concern when viewed in combination with the similar impacts anticipated from the proposed 25-year plan for the redevelopment of nearby Squaw Valley. The EIR has not adequately analyzed



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or mitigated these impacts. Increased traffic also increases greenhouse gas emissions, another issue of statewide importance, which is an identified significant impact of the Project that can and should be mitigated. As you are aware, on July 7, 2016, the Placer County Planning Commission voted against certification of the EIR and we urge you to do the same in order to address the inadequacies we have identified.

A. THE EIR INCLUDES AN ANALYSIS OF THE INCREASED VEHICLE USE IN THE BASIN THAT WILL RESULT FROM THE PROJECT, BUT FAILS TO DETERMINE WHETHER THE INCREASE IS A SIGNIFICANT IMPACT.

In its response to comments, the final EIR (FEIR) includes a discussion of the Project's impact on vehicle use within the basin. The FEIR anticipates that the Project's summer peak daily traffic would generate 1,394 daily trips traveling into the basin. (FEIR 3-17.) The TRPA, the agency charged with regulating and protecting Lake Tahoe, considers the addition of more than 200 daily trips to be a significant impact. (TRPA Code, § 65.2.3.G.) The FEIR also projects that the Project will create an estimated 13,745 additional vehicle miles travelled (VMT) on a summer Friday, an estimated .07 percent increase in VMT within the basin. The addition of the Project's VMT would bring the total VMT in the basin to 1,998,345, which is below TRPA's threshold for basin-wide VMT, but only by a small margin (the VMT threshold is 2,067,600). (FEIR 3-17.) The EIR acknowledges TRPA's standards but asserts that it need not use them as the standards of significance for evaluating the Project's traffic impacts within the basin. (FEIR 3-17.) Rather than identify an alternative standard of significance against which to measure the increase in traffic within the basin, the document's discussion of whether the increase is significant ends there. (FEIR 3-17 to 3-18.)

Lead agencies have the discretion to set standards of significance and are not required to accept significance standards adopted by agencies that will not have regulatory authority over the project. (*Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) However, if evidence is submitted showing that the environmental impact might be significant despite the significance standard used in the EIR, the agency must address that evidence. (See *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1111.) If the agency does not respond by changing the standard, it should respond by explaining the basis for the standard used. (*Id.*; see also, *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 898 [the substantial evidence standard applies to challenges to the scope of an EIR's analysis of a topic, the methodology used for studying an impact, and the reliability or accuracy of the data upon which the EIR relied].) Because Placer County did not set a standard of significance for assessing traffic impacts to Lake Tahoe, it is impossible to know whether its rejection of TRPA's standard is appropriate and supported by substantial evidence.


In addition, while Placer County, as the lead agency, may not be required to use TRPA's standards, it must still determine whether the increase in VMT in the basin that will result from the Project is a significant impact. (See *Protect the Historic Amador Waterways v. Amador Water Agency*, *supra*, 116 Cal.App.4th at p. 1109 [holding that even where a pertinent standard of significance exists, compliance with that standard does not relieve an agency of considering other evidence that suggests an impact may exist]; *Lotus v. Department of Transportation* (2014)

The proposed Event Center IS REQUIRED to use TRPA's standards.

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223 Cal.App.4th 645, 654 [finding environmental document inadequate where discussion of impacts was included but without any information to enable the reader to evaluate the significance of the impacts discussed].) Because the EIR fails to identify whether the increased vehicular use within the basin is a significant impact, the EIR is inadequate.

B. THE EIR FAILS TO ANALYZE AND MITIGATE FOR THE IMPACTS ASSOCIATED WITH INCREASED VEHICULAR USE WITHIN THE TAHOE BASIN.



Although, as discussed above, Placer County in its EIR did not determine the significance of the increased vehicular use in the Tahoe Basin, it does appear that this impact will be significant. The EIR anticipates that the Project will result in more than six times the number of daily trips to the basin that TRPA would determine to be significant. (FEIR 3-17.) The EIR also projects that the Project will create an estimated .07 percent increase in VMT, bringing the total VMT in the basin within a close margin of TRPA's threshold. (FEIR 3-17.) The FEIR did not consider the impacts associated with this increase in vehicular use in the Tahoe Basin. These include impacts to air and water quality within Lake Tahoe and impacts to TRPA's ability to implement its Regional Plan and achieve its environmental goals within the Tahoe Basin. Placer County should analyze these impacts prior to certifying the EIR.

An EIR must identify all of the environmental impacts, direct and indirect, associated with a proposed project. (Cal. Code Regs., tit. 14, §§ 15123, 15126.2.) Indirect effects include secondary effects. (Cal. Code Regs., tit. 14, §§ 15358(a)(2); 15064(d)(2).) In addition, the impacts analysis must take into account the regional setting with "special emphasis" on environmental resources that are rare or unique to the region and would be impacted by the project. (Cal. Code Regs., tit. 14, § 15125(c).) The CEQA Guidelines are clear that "[t]he EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." (Cal. Code Regs., tit. 14, § 15125(c).) Here, the EIR does not include an analysis of the impacts that will be associated with the Project's increase in vehicular use within the Tahoe Basin and is, therefore, inadequate.


1. The EIR does not include an analysis of the air and water quality impacts associated with the Project's increased traffic within the basin.

The significant increase in traffic within the basin will have a direct impact on the air and water quality of Lake Tahoe. Increased vehicular use generates significant amounts of dust and leads to nitrogen deposition in the lake, which in turn causes algae growth that threatens the clarity of the lake. (See Final Lake Tahoe Total Maximum Daily Load Report, November 2010, 3-7, 7-8, and 11-11.)¹ Vehicle trips also contribute to air pollution and global warming. The

¹ The report is available at:
http://www.waterboards.ca.gov/lahontan/water_issues/programs/tmdl/lake_tahoe/docs/tmdl_rpt_nov2010.pdf.

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EIR does not include an analysis of these environmental impacts to Lake Tahoe that will result from the Project's increase in vehicular use.



The traffic analysis contained in the draft EIR (DEIR) is limited to impacts to level of service on specific roadway sections. (See FEIR Chapter 10.) It was not until the FEIR, in response to comments, that Placer County considered VMT and daily vehicle trips to Lake Tahoe. (FEIR 3-17 to 3-18.) While Placer County was correct to include this analysis, the information it yielded also should have been folded into the document's analysis of air and water quality, with a particularized discussion of impacts to Lake Tahoe.


Several commenters on the DEIR requested this analysis. Rather than revisit the air and water quality analyses, however, the FEIR suggests instead that mitigation measures proposed in the DEIR and policies incorporated into the Project to address transit impacts would address any impacts that may result from the increased vehicle use in the basin. (FEIR 3-18.) This response is legally insufficient. An EIR cannot substitute or compress its analysis of impacts with a discussion of mitigation measures. (See *Lotus v. Department of Transportation*, *supra*, 223 Cal.App.4th, at p. 656 ["By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA."].)

Interestingly, in the staff report to the Planning Commission, Placer County staff included a discussion of the air and water quality impacts associated with increased vehicular use in the basin. (See June 30, 2016, Staff Report to the Placer County Planning Commission, 5-6.) The staff report acknowledges that "the majority of vehicle-related pollutants that enter Lake Tahoe are from vehicle sources within the Tahoe Basin." The staff report goes on to conclude that "[t]hus, the 65-70 percent of vehicle trips associated with the project that would not enter the Lake Tahoe Basin would not affect Lake Tahoe water quality. Furthermore, project-related vehicle trips that would enter the Lake Tahoe Basin would remain below TRPA's VMT threshold." (*Id.*) This post-EIR analysis does not cure the EIR's deficiency and only underscores the fact that the EIR should have included an analysis of these air and water quality impacts. (See *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 [emphasizing that the EIR must contain facts and analysis necessary to ensure a meaningful public process]; *People v. County of Kern* (1974) 39 Cal.App.3d 830, 841 [requirement of detail in EIR "helps insure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug."].)




In addition, even if the analysis provided in the staff report had been included in the document, compliance with TRPA's VMT threshold is not an adequate basis for concluding that the increase in traffic will not have impacts to air and water quality within the basin. TRPA's threshold for VMT is an environmental carrying capacity for the basin. Because it is a basin-wide carrying capacity, no single project *should* exceed the threshold. In order to achieve the thresholds, TRPA is required to adopt a Regional Plan that sets forth standards for projects and activities within the basin. (See TRPA Compact, Art. V(c).) These standards apply in addition to the thresholds and are the primary mechanism by which TRPA ensures that new development contributes to, and does not thwart, threshold attainment. Thus, these standards provide additional criteria that apply to individual in-basin projects to ensure environmental impacts are adequately mitigated.

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Of particular relevance here, TRPA's standards characterize any proposed development that creates more than 200 daily vehicle trips as having a significant traffic impact and requires an analysis of air quality impacts associated with the project prior to project approval. In addition, all new development projects are required to provide an air quality mitigation fee to offset regional and cumulative impacts. (TRPA Code of Ordinances § 65.2.) These standards apply regardless of whether or not the project will exceed the TRPA VMT threshold. As a result, it is inaccurate to suggest that compliance with the VMT threshold is sufficient to ensure that the project will not have air and water quality impacts within the basin. Further, in discussing the vehicle impacts, the document specifically indicates that it need not apply and is not applying TRPA standards in order to determine whether the in-basin impacts are significant. (FEIR 3-17 ["the proposed project does not occur in the basin and is not under the jurisdiction of TRPA, so effects on the TRPA thresholds are not used as standards of significance in this EIR..."].) It is inconsistent, on the one hand, to decline to apply TRPA's standards for purposes of the traffic analysis in the EIR, but then, on the other hand, rely on TRPA's standards post-EIR in order to conclude that the increase in traffic will not have air and water quality impacts.



Rather than point to the VMT threshold post-EIR, when it specifically elected not to apply the VMT threshold as the standard of significance in the EIR, or point to other mitigation measures, Placer County should revise and recirculate the EIR to include a meaningful analysis of the air and water quality impacts that will result from the Project's vehicular impacts within the Tahoe Basin.


2. The EIR does not include an adequate discussion of potential mitigation measures to address the impacts associated with the Project's increased traffic within the basin.

In addition to declining to analyze the Project's air and water quality impacts to the Tahoe Basin, the EIR likewise fails to discuss adequate mitigation measures that could, to the extent necessary, address these impacts. The failure to identify mitigation measures for air and water quality impacts that will occur in the basin as a result of the Project's increase in vehicular use follows, in part, from the EIR's failure to analyze these impacts and determine whether or not they are significant. Nevertheless, because Placer County points to proposed mitigation measures and policies that it claims "would reduce VMT impacts of the Project in the Basin" (see FEIR 3-18), a discussion of these measures and policies is warranted. It is also worth discussing the mitigation measures that several commenters proposed to address these impacts, as well as Placer County's discussion of these air and water quality impacts in its staff report to the Planning Commission for the Project.

a. The mitigation measures and policies Placer County points to are insufficient to address the impacts of increased vehicle use within the basin.


Placer County points to mitigation measures that have been adopted for transit impacts and policies to enhance transit built into the Project as being sufficient to reduce VMT impacts of the Project in the basin. (FEIR 3-18.) While it is difficult to gauge whether mitigation is

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sufficient when the impacts have not been quantified, in this instance the measures are facially deficient because they do not guarantee implementation of effective mitigation, nor are the mitigation measures specific to the impacts within the Lake Tahoe Basin. Regardless of the extent of the impacts, these mitigation measures are not sufficient to reduce the environmental impacts resulting from increased VMT within the basin, let alone the transit impacts they purport to address.

First, mitigation measure 10-5a consists of establishing a new Zone of Benefit or annexing into an existing Zone of Benefit to “provide adequate funding of capital and ongoing operational transit services/requirements.” (DEIR 10-33.) The mitigation measure does not specify the amount of the funding obligation, nor does it identify target projects, nor is there any guarantee that the projects it identifies will improve conditions in the basin versus elsewhere in Placer County (e.g., in the town of Truckee). (See FEIR 3.5-448 [stating that the specific level of transit service improvements that would be funded has not yet been defined].) While funding contributions to improve transit could be a valid mitigation measure, the funding obligation is too vague and too disconnected from impacts within the basin to serve as a valid mitigation measure for these impacts. (See *California Clean Energy Commission v. City of Woodland* (2014) 225 Cal.App.4th 173, 197 [fair share fee to fund studies to identify strategies to address urban decay too speculative where EIR did not estimate costs, define how strategies might be implemented, or commit city to undertake actual measures to address urban decay]; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727 [requirement that project applicant pay funds to purchase replacement groundwater not adequate mitigation because it was not known whether groundwater was available].)



Second, mitigation measure 10-5b is also inadequate. Mitigation measure 10-5b consists of a requirement that the commercial and homeowner associations maintain membership in the Truckee North Lake Tahoe Transportation Management Association. (FEIR 2-21.) Membership in an association does not ensure active participation nor that any on the ground improvements will be implemented to relieve impacts related to increased vehicle use in the Lake Tahoe Basin, let alone the transit issues the mitigation measure is designed to address. (See Cal. Code Regs., tit. 14, § 15370 [defining mitigation as including activities that will avoid, minimize, rectify, reduce, or compensate for an impact].)



Third, the policies Placer County points to are, likewise, vague and not sufficiently specific enough to ensure that there will be no impacts from increased vehicular use within the basin. For example, Placer County points to Policy CP-13 of the Project, which proposes to implement a shuttle with construction of the 340th unit of the Project (FEIR 3.3-5.) The basis for the timing of implementation of the shuttle service is not clear, nor is it clear that the shuttle would address VMT impacts within the basin – e.g., the routes for the shuttle are not specified, nor is the frequency of the service. Rather than point to these other measures and policies, Placer County should: (1) provide an adequate analysis of the vehicle impacts and associated air and water quality impacts within the basin, and (2) as necessary, propose adequate and binding mitigation measures tailored to address any significant impacts that result from increased vehicular use in the basin.

Both Martis Valley West and Squaw Valley subsequently agreed to pay approximately \$445K each as contributions to improve transit. How have these dollars been utilized? Provide specific studies, projects etc.

TRPA legal Counsel has also weighed-in with a comment on VMT in the Tahoe Basin. According to TRPA's General Counsel, based on increased traffic counts, it is assumed that the Tahoe Regional Planning Agency's VMT threshold standard is no longer in attainment.

Therefore, any increase in VMT in the Tahoe Basin is expected to contribute to violation of the TRPA threshold.

8/28/2019, TRPA Regional Plan Implementation Committee meeting:

This cannot be confirmed until TRPA's transportation model has been updated, which is expected in 2020. However, TRPA has been informing project applicants that projects can't increase VMT for this reason.

VMT is a huge consideration that cannot be taken lightly. The League to Save Lake Tahoe voiced concerns during this process. They generated a study in 2016 associated with VMT coming into the basin from a proposed project in Martis Valley. The analysis stated the basin is within 3% of exceedance. Since then more projects have been approved and a real-time basin-wide VMT cumulative analysis must be performed. Bill Yeates asked the 64 thousand-dollar question? Which project puts us over?

From the Martis Valley West Specific Plan project

The DEIR/S fails to properly analyze the cumulative effects of Squaw and Martis Valley on VMT. If 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. Simply concluding that Squaw and Martis Valley "would not make a considerable contribution to a significant cumulative impact," without any adequate explanation is not only not legally defensible, it is a potentially dangerous conclusion that could put the Lake at risk and result in a failure to prepare for a threshold nonattainment. Further, there is no discussion as to what is considered "significant" in either the transportation section of the Area Plan DEIR/S or the cumulative impact discussion. Concluding that there is not a considerable contribution to a significant cumulative impact is arbitrary because there is no standard of significance. While the Area Plan DEIR/S shows that VMT will decrease by 2035, again there is still no discussion of the Squaw and Martis Valley projects' impacts to existing conditions, or to future Area Plan build-out. Even with the projected beneficial improvement of a reduction to 1,931,634 VMT in 2035, the additional VMT from Squaw and Martis Valley would still bring the VMT threshold to **within 0.967% of complete attainment.** The work and efforts put forth through this Area Plan to improve existing traffic conditions could be negated by these projects. These inaccuracies must be resolved in the FEIR/S. The Squaw and Martis Valley FEIR/S should also be amended to reflect the most current data, and all of this information should be made public.

As stated by TRPA GB Members at the January 2020 meeting: modeling not based upon Tahoe Specific is problematic and should be based on more suitable information related to Tahoe specifically and not comparison data from other studies in Colorado, etc. Tahoe is unique and yes data difficult to compare this project to but with that said, over-densifying an area should not be the answer to economic deficit.


STAFF REPORT

Date: January 15, 2020
To: TRPA Governing Board
From: TRPA Staff
Subject: Tahoe Douglas Visitor's Authority Tahoe South Event Center Draft Environmental Assessment, TRPA File# ERSP2017-1212, 55 Highway 50, Stateline, NV (Douglas County, Nevada, APNs 1318-27-002-006)

Summary and Staff Recommendation:


No action is required at this time. Staff requests the Governing Board (GB) offer comments and solicit public input on the Draft Environmental Assessment for the Tahoe South Event Center project.

Background & Summary:



In November 2017 the Tahoe Douglas Visitor's Authority (TDVA) submitted a project application to TRPA for a 6,000-seat Event Center located in Stateline, Douglas County, Nevada at the southeast corner of the US Highway 50 intersection with Lake Parkway on the site where Mont Bleu is currently located. The TDVA is responsible for the planning, construction and eventual operation of the Event Center. TRPA released the draft Environmental Assessment on January 13, 2020. The EA identifies scenic quality, groundwater interception, and traffic impacts and mitigations are summarized and discussed below. The analyses conclude that all potential impacts can be fully mitigated with specific and enforceable mitigation. In particular, the traffic mitigations require an aggressive mitigation monitoring program and mandatory adaptive measures in the event monitoring reveals that transit service and parking management are not achieving the required trip and VMT reduction performance measures. TRPA is seeking Board and public comment on the draft environmental analysis, proposed mitigations, and project conditions before bringing the project for decision.

Who will be responsible (and how often) for monitoring and assessing the need for adaptive measures and/or additional mitigations?



During trade shows, ice skating shows, and sporting events, such as hockey, basketball and volleyball, up to 4,200 seats would be available. To reduce traffic loads and competition with other area venues during the peak season, which runs from June 15 through Labor Day, a 2,500-seat limit would be implemented for the Events Center during the peak season along with a paid parking program and a new micro transit service. In addition, the Events Center is designed for “shelter-in-place” (i.e., as an emergency shelter) during an emergency should a natural disaster occur in the area. Office and meeting spaces are designed to accommodate Event Center administration, the TDVA and the Tahoe Chamber of Commerce. It is anticipated that community meetings such as the Douglas County Board of County Commissioners would be held in one of the meeting rooms. It is estimated that the Event Center could host approximately 130 events per year at forecasted operating efficiency, with most of the events likely occurring in spring, early summer, and fall months.

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As stated in recent Douglas County Board of Commissioners meetings they are trying to eliminate the use of a Tahoe facility and/or pay less than \$50K a year. To further support the assessment of not using a Tahoe facility and taking millions from the tax roll is Senator Settlemeyers comment: Senator Settlemeier, Senate District 17 representing Douglas, Lyon, Storey and Churchill Once we bring the people to Tahoe, then Tahoe will sell itself.... Senator Settlemeier said in 1986, 70 percent of the property taxes in Douglas County were generated at Lake Tahoe. Now it's 36 percent. The district lines have changed and with redistricting coming up, it will happen again.


TRPA Code provides a path to acknowledging the Event Center should be analyzed as an EIS

CHAPTER 3: ENVIRONMENTAL DOCUMENTATION

3.1. PURPOSE


This chapter sets forth the provisions regarding environmental documentation.

3.2. APPLICABILITY



3.2.1. Environmental Impact Statement Required

Article VII(a)(2) of the Compact requires TRPA, when acting upon matters that may have a significant effect on the environment, to prepare and consider a detailed environmental impact statement (EIS) before deciding to approve or carry out any project.



3.2.2. Activities and Projects Exempt from Preparation of Environmental Impact Statement

Article VII(f) of the Compact, requires TRPA to adopt by ordinance a list of classes of projects which TRPA has determined will not have a significant effect on the environment and therefore shall be exempt from the requirement for the preparation of an environmental impact statement.

A. Projects Exempt From Preparation of Environmental Impact Statement

The projects listed below shall be exempt from preparation of an EIS and other environmental documents.

1. Construction of single-family houses and additions and accessory structures thereto, in compliance with the provisions of the Code;
2. Changes in use consisting of minor increases in vehicle trips (See Chapter 65: *Air Quality/Transportation*); and
3. Transfers or conversions of development rights (does not include construction of new units).

B. Significant Effect

The categorical exemptions listed above shall not be used for a project where there is a reasonable possibility that the project will have a significant effect on the environment due to unusual circumstances.



The examples for exempt projects make sense the Event Center proposal does not. A brief discussion is not appropriate. This project must require more detailed analysis due to the sheer size, anticipated traffic impacts which will be difficult to mitigate appropriately based on assumptions and no real criteria for specific traffic models, dynamic scenic changes, etc. This points out several reasons for this project to be analyzed under an EIS.

3.4. ENVIRONMENTAL ASSESSMENTS

If TRPA determines the IEC will not provide sufficient information to make the findings in subsection 3.3.2, TRPA shall require the preparation of an environmental assessment in lieu of an initial environmental checklist.

3.4.1. Environmental Assessment Contents

Environmental assessments shall contain the following elements:

-  **A.** A brief discussion of the need for the project;
- B.** Alternatives to the proposed project;
-  **C.** A discussion of the environmental impacts of the proposed project and the alternatives; and
- D.** A list of agencies and persons consulted.

3.4.2. Findings for Environmental Assessment

Based on the information contained in the environmental assessment and other information known to TRPA, TRPA shall make one of the findings listed under subsection 3.3.2 and take the action prescribed in the applicable finding.

3.4.3. Availability of Environmental Assessments

TRPA shall make environmental assessments available for public review not less than five working days before TRPA intends to take action on the project.

Discussions as noted in the EA code should not replace detailed analysis requirements.

3.7. ENVIRONMENTAL IMPACT STATEMENT

If TRPA finds a project or matter may have a significant effect on the environment, TRPA shall cause to be prepared an EIS in accordance with its Rules of Procedure, this chapter, and the Compact.



3.7.1. Preparation of EIS

When preparing an EIS, TRPA shall:

- A. Utilize a systematic interdisciplinary approach that integrates natural and social sciences and the environmental design arts in planning and decision making that may have an impact on man's environment;
- B. Study, develop, and describe appropriate alternatives to recommended courses of action for any project that involves unresolved conflicts concerning alternative uses of available resources;
- C. Consult with and obtain the comments of any federal, state, or local agency that has jurisdiction by law or special expertise with respect to any environmental impact involved. Copies of such statement and the comments and views of the appropriate federal, state, and local agencies that are authorized to develop and enforce environmental standards shall be made available to the public and shall accompany the project through the review processes; and
- D. Consult the public during the environmental impact statement process and solicit views during a public comment period of not less than 60 days.

3.7.2. Contents of EIS


An EIS shall include, at a minimum, the following:

- A. Description of the project;
- B. The significant environmental impacts of the proposed project;
- C. Any significant adverse environmental effects that cannot be avoided should the project be implemented;
- D. Alternatives to the proposed project;
- E. Mitigation measures that must be implemented to assure meeting standards of the region;
- F. The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity;
- G. Any significant irreversible and irretrievable commitments of resources that would be involved in the proposed project should it be implemented; and
- H. The growth-inducing impact of the proposed project.

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This comes down to making the necessary Findings as defined in Chapter 4 of TRPA Code



CHAPTER 4: REQUIRED FINDINGS

4.1. PURPOSE


The Tahoe Regional Planning Compact requires TRPA to make findings before taking certain actions. In addition, the Regional Plan package, including the Code and plan area statements, sets forth other findings that must be made. This chapter sets forth procedures describing how TRPA shall make the findings required.

4.2. APPLICABILITY

Prior to approving any project or taking any other action specified in this Code, TRPA shall make the findings required by the provisions of the Regional Plan package, including the Goals and Policies, the Code, and specifically this chapter and any other requirement of law. All such findings shall be made in accordance with this chapter.


4.3. PROCEDURE FOR FINDINGS

Findings shall be made as provided below.



4.3.1. Written Findings

All required findings shall be in writing and shall be supported by substantial evidence in the record of review. The findings required by Section 4.4 shall be in writing prior to the approval of the proposed matter.



4.3.2. Statement


Required findings shall be accompanied by a brief statement of the facts and rationales upon which they are based.

4.4. THRESHOLD-RELATED FINDINGS

The following specific findings shall be made, pursuant to Articles V(c), V(g) and VI(b) of the Compact, in addition to any other findings required by law.

4.4.1. Findings Necessary to Approve Any Project

To approve any project TRPA shall find, in accordance with Sections 4.2 and 4.3, that:

- 
- A. The project is consistent with and will not adversely affect implementation of the Regional Plan, including all applicable Goals and Policies, plan area statements and maps, the Code, and other TRPA plans and programs;
 - B. The project will not cause the environmental threshold carrying capacities to be exceeded; and
 - C. Wherever federal, state, or local air and water quality standards apply for the region, the strictest standards shall be attained, maintained, or exceeded pursuant to Article V(d) of the Tahoe Regional Planning Compact.

4.4.2. Making Specific Findings

As part of the findings required by subparagraph 4.4.1, TRPA shall:

- A. Identify the nature, extent, and timing or rate of effects of the project, using applicable measurement standards consistent with the available information, on all applicable:

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Additional information on the League's position on VMT in 2016

THE LEAGUE TO SAVE LAKE TAHOE STEPS UP THEIR GAME

Mark | October 16, 2016 | Editorial, Featured | 6 Comments



Near-Tahoe development: looming threat to Tahoe?

Tahoe and traffic. Those two shouldn't go together.

People visit Tahoe to get away from it all, including traffic, but a typical Tahoe vacation is likely to include time stuck on our congested roads. And scientists have found that excessive car traffic poses a critical threat to Lake Tahoe clarity.

"The League is concerned that nearby developments that circumvent Tahoe standards will become a new tactic for those looking to make a profit but hesitant to provide environmental benefits to the Lake as required by TRPA," said Darcie Goodman Collins, PhD, the League's executive director.

The Placer County Board of Supervisors met last week in Auburn and completed the final approvals on the Martis West project. It's not even close to the end though, because we expect that local environmental groups will be filing suit shortly. That was to be expected and we applaud Sierra Watch's efforts. Here's the [complete Sierra Watch press release](#).

More surprising is that the League to Save Lake Tahoe is stepping up their game. I've probably received their newsletter in the mail before and never really given it much thought. But this newsletter contained two articles about development within the region posing a threat to Lake Tahoe. Kudos to the staff at the League to Save Lake Tahoe for taking a stand. The more we stand together, the better chance we have of stopping unchecked development within the North Tahoe region. Here's two articles from their newsletter:

NEAR-TAHOE DEVELOPMENT: LOOMING THREAT TO TAHOE?

TAHOE AND TRAFFIC. THOSE TWO SHOULDN'T GO TOGETHER.

People visit Tahoe to get away from it all, including traffic, but a typical Tahoe vacation is likely to include time stuck on our congested roads. And scientists have found that excessive car traffic poses a critical threat to Lake Tahoe clarity. Traffic threatens Lake Tahoe's health by increasing air pollution that feeds algae. Scientists have also found that the top cause of clarity loss in Lake Tahoe is fine sediment pollution, predominantly coming from cars crushing the road sands used to make winter driving safer.

At the time this Newsletter went to print, two proposed massive projects near Tahoe are in the final stages of environmental review by local government officials: one at Martis Valley West, on a ridge overlooking Lake Tahoe, and the other in Squaw Valley. These projects would draw thousands of people to Tahoe, but do not fall under the direct oversight of the Tahoe Regional Planning Agency. Because they are located just outside of the Lake Tahoe Basin boundary line, each circumvents the standards that protect the lake. Each would clog the area with traffic and pollute Lake Tahoe.

These projects, aimed at Tahoe visitors and second home owners would degrade the lake by adding pollution from the the traffic equivalent of 2,000 cars each driving 18 miles daily to get to Tahoe destinations.

“The League is concerned that nearby developments that circumvent Tahoe standards will become a new tactic for those looking to make a profit but hesitant to provide environmental benefits to the Lake as required by TRPA,” said Darcie Goodman Collins, PhD, the League’s executive director.

There are solutions to Tahoe’s traffic problems. Thanks to your support, League staff have the resources to advocate at the local, state and federal levels for funding for innovative Lake-friendly transportation solutions. We are working with the Tahoe Transportation District to identify options to improve public transit. Our staff is collaborating with private developers and the business community to ensure redevelopment in Tahoe’s communities makes it easier for people to walk, ride a bike or take the bus.

“We will continue to collaborate with local government agencies, TRPA, advocates and the project proponents when possible to insist developers of out-of-Basin projects provide reasonable solutions to the negative traffic impacts to Page 8 posed by their projects,” said Dr. Collins.

LEAGUE CONDEMNS PLACER COUNTY APPROVAL OF MARTIS VALLEY WEST PROJECT

Sep 13, 2016

This afternoon, the Placer County Board of Supervisors voted 4-1 to approve the controversial [Martis Valley West proposal](#). The following is a statement by League to Save Lake Tahoe Executive Director Darcie Goodman Collins, PhD: “This is bad news for Lake Tahoe. By approving Martis Valley West, Placer County is consenting to threats to Tahoe for which no solution has been proposed. In their decision, the majority of supervisors ignored the environmental laws California has set up to protect important places like Tahoe. This sets a terrible precedent.

California environmental law is meant to ensure adequate analysis of the negative impacts of proposed development, and requires solutions be implemented to address the impacts that cannot be avoided. No solutions were advanced to address the project’s estimated increases in

traffic at Tahoe.

Traffic is one of the most significant sources of pollution threatening the Lake's clarity. This decision brings us too close to the threshold for car trips in the Tahoe Basin, a figure expressed in vehicle miles traveled. Cumulatively, traffic from the proposals at Martis and Squaw would bring Tahoe within 3 percent of Tahoe's threshold for vehicle miles traveled.

Future projects located inside the Lake Tahoe Basin may now not be approved because of our nearness to the threshold. This is unfortunate, as Tahoe's Regional Plan Update would require such in-Basin projects to deliver environmental benefits to Lake Tahoe. Will it become a new norm for area jurisdictions to ignore threats to Tahoe, and pile up development just outside the Lake Tahoe Basin? Organizations such as ours will continue to advocate for Lake-friendly redevelopment and a stronger set of protections for Lake Tahoe."



https://www.trpa.org/wp-content/uploads/H_Events_Center_Scenic_Evaluation_report.pdf

Scenic Assessment

Parking: Existing parking for MontBleu totals 1,494 parking spaces (including all surface and garage lots). The Events Center proposes to reorganize the surface parking areas and would reduce the number of available spaces by 468.

Common sense tells us by adding a large event center venue additional parking will be required not a reduction as proposed.

As part of the 2012 TRPA RPU process, TRPA identified potentially significant scenic impacts related to increasing building heights in community centers (including the High Density Tourist District). TRPA adopted scenic mitigation measure 3.9-1b to require no net increase in visual prominence for redevelopment of existing high-rise structures in the High Density Tourist District. Because the Events Center project does not include redevelopment of an existing high-rise structure, mitigation measure 3.9-1b does not apply to the Project. The following standards are applicable to the scenic analysis of the Events Center project. • The Events Center is not subject to the scenic findings in TRPA Code Section 37.7 –specifically Sections 37.7.16 (Finding

16 –Three-or Four-Story Buildings in Town Centers and Three-to Six-Story Buildings in the Regional Center) and 37.7.17 (Finding 17 –Redevelopment in High Density Tourist District within Existing Visual Prominence) and the findings identified therein do not apply to the proposed Events Center in the High Density Tourist District of the South Shore Area Plan. •Maximum permissible height for a new Events Center building in the High Density Tourist District of the South Shore Area Plan is 95 feet. •The Events Center is subject to the 80/20 standard set forth in Section 2.1.17 of the TRPA Design Standards and Guidelines. Section 2.1.17 of the Design Standards and Guidelines states "The travel route of Hwy 50 has a 'canyon effect' because the existing tower structures are located too close together with inadequate setbacks. Within a given property, eighty percent of the buildings fronting Hwy 50 shall not exceed 56 feet in height when an existing building or buildings are being replaced within 100 feet of the right-of-way. Twenty percent of the building or buildings frontage may be constructed to a maximum height of 95 feet." •The Events Center is subject to the applicable standard that projects shall maintain or improve the scenic quality ratings for scenic resource units, roadway units or shoreline units as specified in Code Chapter 66.

Comments on the 2018 EA Draft

These previous comments during 2018 scoping are still appropriate.

1). Alternatives to the Proposed Project "My devil's advocate comment on the whole thing is why they even need the events center: the casinos have huge ballrooms that can and should be used for concerts and performing arts events. Can't they redesign those within the existing footprint? Those ballrooms go empty so much of the time, so we really need another events center?" (Dondra Biller)

2). Purpose and Need and Project Objectives.... addresses the need to strengthen the economic health of Douglas County and its townships through promotion and development of tourism and economic redevelopment. Revenue generated by the transient occupancy tax is designated for studies and actual development toward this goal. This goal is very broad and non-restrictive. True, the South Shore of Lake Tahoe currently lacks a year-round venue, but the Douglas County Board of County Commissioners have not concluded within the referenced Douglas County Codes that such a venue is necessary. The commissioners only state, "All funds collected will be used to increase and support special events and tourism related venues..." The proposed South Shore Events Center is within the scope of the code, but has not been identified as the singular solution. The narrative of the scoping document steers the dialog down one path and implies that alternative proposals, such as other than an events center or even an events center at a different site, have already been considered, dismissed and are no longer under consideration.

Topic of discussion: Desired Condition. References: 2a) Tahoe Regional Planning Agency Regional Plan adopted June 06, 2016, Chapter 2, Land Use Element, Policy LU (Land Use) - 1.1; 2b) Douglas County, Nevada, South Shore Area Plan, adopted by TRPA on September 25, 2013, Section on Phase I: South Shore Area Plan, sub-section High Density Tourist District; 2d) Douglas County, Nevada, Master Plan Drafted October 2014 (and awaiting TRPA approval),

Section on Phase I: South Shore Area Plan, sub-section High Density Tourist District. The description of the desired condition is repeated verbatim below from the scoping notice. The text in italicized, larger font is the topic of discussion. DESIRED CONDITION: The desired condition is a high-quality public assembly and entertainment venue for residents and visitors to the south shore of Lake Tahoe. There is also a desire to reinvent the built environment....2a) Comments: The desire for a high-quality venue is inconsistent with the approved objectives stated in each of References (2a) through (2c). An extract from Reference 2(a) is repeated below: THE PRIMARY FUNCTION OF THE REGION SHALL BE AS A MOUNTAIN RECREATION AREA WITH OUTSTANDING SCENIC AND NATURAL VALUES. From References 2(b) and 2(c), addressing the area bounded by the Casino Core Area and the lower Kingsbury area, and therefore applicable to the proposed events center, the plans state, The objective is to transform the area into a world class recreational tourist destination, which will include... All redevelopment projects in the High Density Tourist District will be evaluated to ensure consistency with these overall objectives.2b) Proposed Resolution -As approved and slightly restated from above, all redevelopment projects in the High Density Tourist District shall be evaluated to ensure consistency with the overall objectives. TRPA and Douglas County should review the proposed events center for compliance with its own established objectives.

It is not apparent how a public assembly area and entertainment venue qualifies as a world class recreation destination while showcasing the beauty that is Lake Tahoe. The plans for the events center should either be abandoned for non-compliance, or the regional plans and South Shore plans should be modified to support the creation of an events center.” (John Jay)

3). NEPA and TRPA Requirements “1. NEPA requires TRPA to accurately analyze the potential impact of the project on TRPA’s vehicle miles traveled threshold standard. An Environmental Assessment (“EA”) is intended to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a “finding of no significant impact” (“FONSI”). In evaluating the significance of a proposal for agency actions, the EA should focus on the context and intensity of effects that may significantly impact the quality of the human environment. Thus, in order to issue a FONSI TRPA must properly conclude that the Project will not “have a significant effect on the human environment.


Here, it is unclear how TRPA may properly make such a finding without a complete and accurate analysis of VMT based on current conditions. The Bi-State Compact requires TRPA to adopt environmental threshold carrying capacities for the region and to make findings prior to project approval that the Project “will not cause the adopted environmental threshold carrying capacities of the region to be exceeded. (League to Save Lake Tahoe)

Summary and Staff Recommendation:

No action is required at this time. Staff requests the Governing Board (GB) offer comments and solicit public input on the Draft Environmental Assessment for the Tahoe South Event Center project.

Background & Summary:

In November 2017 the Tahoe Douglas Visitor's Authority (TDVA) submitted a project application to TRPA for a 6,000-seat Event Center located in Stateline, Douglas County, Nevada at the southeast corner of the US Highway 50 intersection with Lake Parkway on the site where Mont Bleu is currently located.



The TDVA is responsible for the planning, construction and eventual operation of the Event Center. TRPA released the draft Environmental Assessment on January 13, 2020. The EA identifies scenic quality, groundwater interception, and traffic impacts and mitigations are summarized and discussed below. The analyses conclude that all potential impacts can be fully mitigated with specific and enforceable mitigation. In particular, the traffic mitigations require an aggressive mitigation monitoring program and mandatory adaptive measures in the event monitoring reveals that transit service and parking management are not achieving the required trip and VMT reduction performance measures. TRPA is seeking Board and public comment on the draft environmental analysis, proposed mitigations, and project conditions before bringing the project for decision.

From the December 2019 meeting: A key element in completing the environmental assessment was to ensure that project mitigations and conditions are clearly written, effective at reducing impacts, and enforceable over the long term. That statement begs the question: Is enforceability and assumptions without identified criteria/analysis viable?

As part of the EIS, appropriate fire, law enforcement, other agencies would weigh-in. Have those agencies been consulted and are there any published comments?

Mr. Feldman said people don't construct event centers to make money from them. It could operate at a loss and be a huge success. They expect that it will start at a loss but over time, the forecast is that it will break even and potentially make some money. The economic magic is to the rest of the community, not as an independent profit center.

Again, why should the taxpayers be held fiscally accountable by throwing good money at bad? Reminder a small-scale project known as BLUE GO bus.

As the staff report states: This will be paid for by tax increment financing through the redevelopment area (RDA) in Douglas County. One percent of the lodging license fee which flows to the Tahoe Douglas Visitors Authority would be pledged for bonds and the balance would be made up by what was recently adopted by the State of Nevada; the \$5.00 per night, room night surcharge. That would generate sufficient revenue to construct the facility. I ask that the Governing Board REMOVE the tax increment RDA revenue stream as the \$5.00 per night room surcharge will generate approximately \$4.4 million a month which should be adequate and let the taxpayers, off the hook.

Douglas Board of County Commissioners Ellie Waller for the Record February 27, 2020
Tahoe Regional Planning Agency anticipated March 2020 agenda item

The reality check here is you don't really know what people are going to do. Even at 50/50 paid parking or microtransit use there should be analysis above and beyond the requirements of an EA. The EA did not sufficiently provide that criteria or analysis.