

From: Marja Ambler <mambler@trpa.gov>
Sent: 6/25/2024 4:12:25 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: FW: KLT to TRPA GB re SSAP Public Comments
Attachments: [KLT to TRPA GB re SSAP Public Comments.pdf](#) , [image001.jpg](#)

Marja Ambler
Executive Assistant
775-589-5287



From: Lynsey DeSanto <lynsey@fimmtahoe.com>
Sent: Tuesday, June 25, 2024 4:08 PM
To: John Marshall <jmarshall@trpa.gov>; Julie Regan <jregan@trpa.gov>; Kmoneil <Kmoneil@douglasnv.us>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Hayley Williamson <hayley.a.williamson@gmail.com>; Shelly Aldean <shellyaldean@gmail.com>; fvaguilar@sos.nv.gov; Ashley Conrad-Saydah <ashleyc@alumni.princeton.edu>; Belinda Faustinos <belindafastinos@gmail.com>; TRPA <trpa@trpa.gov>; cody@tahoewellnesscoop.org; Meghan Hays <Meghan.hays9@gmail.com>; Alexis Hill <AHill@washoecounty.us>; Vince Hoenigman <vhoenigman@yahoo.com>; James Settlemeyer <JSettlemeyer@dcnr.nv.gov>; BOSFive@edcgov.us; Wesley Rice <wrice@douglasnv.us>; Alexandra Leumer <TRPALeumer@yahoo.com>; Marja Ambler <mambler@trpa.gov>
Cc: Kara Thiel <Kara@fimmtahoe.com>; Lew Feldman <Lew@FMITTahoe.com>; Clinton Purvance <CPurvance@bartonhealth.org>; mbefu@bartonhealth.org; Chris Proctor <cproctor@bartonhealth.org>; Richard Belli <rbelli@bartonhealth.org>
Subject: KLT to TRPA GB re SSAP Public Comments

Good afternoon,

Please find the attached correspondence from Kara Thiel regarding SSAP Public Comments. Should you have any questions or comments, please feel free to contact our office.

Thank you,

Lynsey DeSanto
Feldman Thiel LLP
P.O. Box 1309
Zephyr Cove, Nevada 89448
Telephone: (775) 580-7431

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FELDMAN THIEL LLP

California and Nevada Lawyers

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Lewis S. Feldman
Kara L Thiel

Of Counsel
Catherine L DiCamillo

Email: kara@fmontahoe.com

June 25, 2024

Tahoe Regional Planning Agency Governing Board
128 Market Street
Stateline, NV 89448

Via Electronic Mail

Re: Response to Public Comments
Informational Presentation and Discussion of Proposed Amendments to the
Douglas County South Shore Area Plan
Agenda Item No. 3, June 26, 2024, TRPA Regional Planning Committee Meeting

Dear Honorable Governing Board Members:

This office is counsel to Barton Health and have reviewed the comments submitted to you via email on June 23, 2024, by Mr. Brett Tibbitts concerning the above-referenced matter and, more specifically, Barton's proposed hospital at the former Lakeside Inn and Casino site. Although the roll out of the proposed South Shore Area Plan (SSAP) Amendments has just begun and Barton's hospital plans are in the early stages of planning and development, we feel it is important to correct misinformation contained in Mr. Tibbitts' email. First, Mr. Tibbitts contends the June 26, 2024, Regional Planning Committee (RPC) hearing is an approval hearing, evidencing a fast track "back room" deal which, of course, is inaccurate on both counts. The RPC hearing is informational, and no action has been agendized. Second, Mr. Tibbitts' claim that TRPA constantly does back room deals like it has with Barton Hospital is entirely without merit. While applicants have not always agreed with TRPA's decisions, we have never had reason to question the integrity of either Governing Board members or TRPA staff.

To be clear, there will be a series of noticed public meetings and hearings on the SSAP amendments affording ample opportunities for the public to review them and associated environmental documentation and provide written and oral testimony. Douglas County has already held a town hall on the proposed amendments from 5 – 7 pm on June 13, 2024, at the Kahle Community Center. (See enclosed Press Release.) Tomorrow's informational presentation to the Regional Planning Committee (RPC) will be the first of several TRPA hearings on the amendment. Following hearings before the Douglas County Planning Commission and Board of County Commissioners, the amendments will be heard by the TRPA Advisory Planning Commission and RPC for recommendation and then the full Governing Board for action. The proposed hospital project will require separate review and approval by TRPA, Douglas County and other agencies having jurisdiction.

Barton Hospital's land holdings on both sides of Highway 50, including the former Lakeside Inn site, are located in the SSAP's Kingbury Town Center Mixed-Use District ("MU District").

Health care services and hospitals are permissible uses in the MU District. Barton currently operates health care services on its properties on the east side of Highway 50, and TRPA and Douglas County could approve a hospital on Barton properties on the west side of Highway 50 under the existing SSAP. Thus, no back room deal is necessary to develop a hospital on the former Lakeside Inn site.

The proposed SSAP amendments include the creation of a Healthcare Subdistrict within the MU District to encompass Barton's holdings and recognize this area as the core for healthcare services and supporting facilities in the SSAP. The proposed amendments include goals, policies and action items specific to the Healthcare Subdistrict and create the opportunity for a hospital project on the west side of Highway 50 to have increased heights up to 85 feet.

Mr. Tibbitts' claims concerning impacts to minority and underserved populations are likewise unfounded. Barton's campus in South Lake Tahoe would remain to provide urgent care and outpatient services to the City's population. Barton received a Certificate of Need from the State of Nevada in March 2024 for the new hospital which would expand specialty care to include oncology and cardiology.

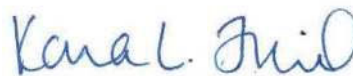
Contrary to Mr. Tibbitts' assertions, the proposed hospital would reduce both trip generation and vehicle miles traveled compared to the existing condition. Finally, if a hospital was not developed on the former Lakeside Inn site, a higher trip- and VMT-generating hospitality and gaming project would be.

Thanks to Douglas County Planning staff, TRPA staff and the RPC for this opportunity to discuss the proposed amendments to the SSAP and preview the concept plan for a new hospital proposed to serve the Region.

Thank you for your consideration of the foregoing.

Sincerely,

FELDMAN THIEL LLP



By:

Kara L. Thiel

KLT/lds

Enclosure

cc: Julie Regan
John Marshall
Douglas County
Client

From: [Kathryn Moroles-O'Neil](#)
To: [Lewis Feldman](#); [Kara Thiel](#); [Chris Proctor](#); mbefu@bartonhealth.org
Subject: FW: Press Release - Planning Division Invites Public to Attend South Shore Area Plan Townhall
Date: Friday, June 7, 2024 9:59:10 AM
Attachments: [image002.png](#)
[image003.png](#)
[image005.png](#)

Kind Regards,

Kate Moroles-O'Neil

Principal Planner | Planning Division
Douglas County Community Development
775.782.6212

Please note that a response by Douglas County Community Development staff in person, to a phone call or an e-mail does not constitute an approval of any application. We strongly encourage you to consult with a legal or real estate professional if you have concerns about whether your proposed actions are appropriate under the laws of Nevada or the Douglas County Code.

Website: <https://www.douglascountynv.gov>

Applications and permits: <https://www.douglascountynv.gov/cms/one.aspx?pageId=12582622>

Title 20: <https://dcnvda.org/CountyCodes.aspx>

GIS public viewer: <https://douglasnvgis.maps.arcgis.com/home/index.html>

From: Eric Cachinero <ecachinero@douglasnv.us>
Sent: Wednesday, June 5, 2024 10:51 AM
To: Eric Cachinero <ecachinero@douglasnv.us>
Subject: Press Release - Planning Division Invites Public to Attend South Shore Area Plan Townhall

FOR IMMEDIATE RELEASE

June 5, 2024

PLANNING DIVISION INVITES PUBLIC TO ATTEND SOUTH SHORE AREA PLAN TOWNHALL



Douglas County, NV - Please join the Douglas County Planning Division on Thursday, June 13 from 5-7 p.m. at Kahle Community Center in Stateline, NV for an informative and educational townhall to preview the amendments proposed for the South Shore Area Plan (SSAP).

The Douglas County Community Development Department is currently preparing a draft South Shore Area Plan, which is intended to further the goals and policies in the Regional Plan and meet the provisions of

Chapter 13, *Area Plans*, in the Tahoe Regional Planning Agency (TRPA) Code of Ordinances, as well as other TRPA regulations.

Douglas County staff will give a brief presentation on the various amendments proposed for the South Shore Area Plan updates. We invite members of the community to review the draft with the team and provide comments or questions on the proposed amendments via conversation with staff, email or townhall worksheets that will be provided as you arrive to the townhall.

Summary:

- The SSAP was adopted by the TRPA Governing Board on September 25, 2013, and the Douglas County Board of County Commissioners on November 21, 2013.
- The SSAP revised the relevant Douglas County plans, maps, and ordinances developed to implement the 1987 Regional Plan, and replaced the Kingsbury and Stateline Community Plans, and the relevant portions of Plan Area Statements (PASs) 070A and 080.
- The prior plans were over 20 years old and had undergone only minor changes since their adoption.
- These amendments require TRPA approval in order to update the SSAP.
- The Area Plan covers properties generally along US 50 from the California-Nevada Stateline to the lower Kingsbury area. It includes the High-Density Tourist District containing the casino core, the Edgewood Lodge and Golf Course, the Edgewood Mountain area, and the Kingsbury Commercial Town Center. These areas are zoned as Tourist, Recreation, Resort Recreation, and Mixed Use, respectively.

Proposed Amendments:

- Create consistent and integrated land use planning and development regulations for Douglas County and TRPA by equitably applying the requirements for similar land uses. The designation of the parcels comprising the Kingsbury Manor Mobile Home Park as partially within and partially outside of the Kingsbury Commercial Town Center does not reflect consistent application of the Regional Plan and redevelopment standards. The amendments aim, in part, to correct this inconsistency.
- Broaden access to regional services and promote redevelopment of the Kingsbury Commercial Town Center through the creation of a new healthcare subdistrict.
- Continue to encourage environmentally beneficial redevelopment in the plan area by implementing an Energy Conservation Strategy.
- Incorporating the signage regulations for the Area Plan that were inadvertently omitted from the Area Plan so that the regulations reflect the most up-to-date and accurate information.
- Increasing the maximum allowable building height for hospital uses in the proposed healthcare subdistrict at the site of the former Lakeside Inn and Casino.
- Updating the changeable sign standard for the High-Density Tourist District from four changes per hour to twelve changes per hour.
- Providing exceptions to TRPA Code Section 33.3.6(A) relating to groundwater interception for projects in town centers if the project is designed to prevent adverse off-site impacts.

These proposed amendments to the South Shore Area Plan are part of a specific scope of work that is nearing completion and this is the public's opportunity to provide feedback.

If you are unable to attend the townhall meeting, please provide comments by **5 p.m., Friday, June 14, 2024** to: kmoneil@douglasnv.us

The South Shore Area DRAFT can be viewed [here](#).

Location: Kahle Community Center
236 Kingsbury Grade
Stateline, NV 89449

June 13, 2024 from 5-7 p.m.

About Douglas County, Nevada

Douglas County, Nevada, a community to match the scenery, is centrally located just 15 minutes south of Nevada's state capital and borders Lake Tahoe. Located on Nevada's western border, the community is framed by the Carson Range of the Sierra Nevada to the west and the Pine Nut Mountains to the east. The community offers miles of open space, expansive ranches and farms, many historical sites and displays, along with numerous outdoor recreation activities. Douglas County is the fifth most populated county in Nevada with approximately 48,000 residents and seasonal populations that can exceed 65,000, due to its proximity to Reno, Carson City and northern California. Douglas County is governed by a five-member elected Board of Commissioners. The County is comprised of ten functional areas – general government, judicial, public safety, public works, sanitation, health, welfare, cultural and recreation, community support and utilities. For more information, visit Douglas County online at [DouglasCountyNV.gov](https://www.douglascountynv.gov).

TITLE VI Notice:

Members of the public who are disabled, require special assistance or accommodations or an interpreter are requested to notify the Douglas County Manager's Office in writing at Post Office Box 218, Minden, Nevada 89423 or by calling 775-782-9821 at least 20 hours in advance of the meeting.

Eric Cachinero

Community Relations Manager/Public Information Officer
Douglas County, Nevada | 1594 Esmeralda Ave. | Minden, NV 89423

Office: 775-782-9015

"Great People, Great Places."

Website:
[douglascountynv.gov](https://www.douglascountynv.gov)





**TAHOE
REGIONAL
PLANNING
AGENCY**

P.O. Box 5310
Stateline, NV 89449

775-588-4547

www.trpa.gov

From: Greg Felton <gregoryrfelton@yahoo.com>
Sent: 6/25/2024 3:53:15 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Hospital in Stateline

TRPA Board,

Though I've not had a chance to review all details associated with the proposed Barton hospital facility in Stateline, NV, I encourage the TRPA to consider this once-in-a-community's-lifetime opportunity to take advantage of the former Lakeside Inn site to develop a state of the art facility that will allow the provision of first-class healthcare for our residents and innumerable guests.

This said, I strongly encourage and expect TRPA to vet the application and all associated conditions publicly to allow residents to voice their opinions, find mitigating solutions to anticipated or suspected problems, and avoid the aspersions some have cast that somehow backroom deals are being struck. Public trust is difficult to establish and maintain, and is critical to our ongoing efficient functioning as a community. I stand ready to help if there's anything I can do.

Thanks,

Greg Felton
Stateline, NV

From: Kevin Boryczki <Kevin.Boryczki@oakviewgroup.com>
Sent: 6/25/2024 3:46:42 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: 6/26/2024 Regional Planning Committee Agenda | Item No 3
Attachments: [image001.png](#), [Letter of Support - Hospital District - Stateline NV - TBEC.pdf](#)

Attached please find a letter of support for the hospital district in Stateline, NV.

Thanks,

Kevin Boryczki
General Manager

Tahoe Blue Event Center
75 US Highway 50, Stateline, NV 89449
O: 775.624.8923 C: 775.790.3736



TAHOE

Blue

— **EVENT CENTER** —



June 25, 2024

TRPA Regional Planning Committee
128 Market Street
Stateline, NV 89410

RE: June 26, 2024-Agenda Item #3 | Douglas County South Shore Area Plan

Dear Chairman Hoenigman,

I am writing to express my support for the establishment of a hospital district and the construction of a new hospital in the Stateline region. As a resident of Douglas County, I believe that a new hospital would bring invaluable benefits to our small rural community, significantly enhancing the quality of life and healthcare services available to us.

The presence of a modern hospital would allow for the expansion of healthcare services in our town. With a new hospital, we would receive care at a higher level in line with many urban areas. The goals of the Tahoe Blue Event Center are to provide entertainment opportunities to our local community and visitors and having a state of the art facility in close proximity to us would be a real benefit.

In conclusion, I support the establishment of the hospital district and the construction of the new hospital. This project represents an opportunity to improve the health, wellbeing, and prosperity of our community.

Thank you for considering my perspective and I look forward to participating in future meetings to speak on behalf of this opportunity.

Best regards,

Kevin Boryczki, General Manager
Tahoe Blue Event Center

From: Christina Frohlich <christina.frohlich@yahoo.com>
Sent: 6/25/2024 3:03:45 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: No Barton on NV side

I'd rather see diversity ie. Carson tahoe or satellite Stanford clinic. Or group of smaller specialists like oncology. Thanks.

Sent from my iPhone

From: Chris Sullivan <crs5009@gmail.com>
Sent: 6/25/2024 3:27:20 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Support for Barton NV

Hello,

I wanted to send a message saying my family fully supports having Barton Facilities on the NV side of town. We have a 4 and 5 year, and aloy of friends with young and growing families. We all believe this would be a great thing for Stateline and the whole community.

Thank you for your consideration

Chris and Shelley Sullivan
306 Kingsbury Grade

From: Steve Brooks <slbtahoe@gmail.com>
Sent: 6/25/2024 12:59:05 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: New Hospital
Attachments: [June 25, 2024.pdf](#)

Sent from my iPhone

June 25, 2024

TRPA Regional Planning Committee

Vince Hoenigman, Chair
128 Market Street
Stateline, NV 89410

***RE: June 26, 2024 RPC Agenda Item #3 | Douglas County
South Shore Area Plan***

Chairman Hoenigman,

I am writing to express my support for the establishment of a hospital district and the construction of a new hospital in the Tahoe-Douglas region. As a resident of Douglas County, I believe that a new hospital would bring invaluable benefits to our small rural community, significantly enhancing the quality of life and healthcare services available to us.


The presence of a modern hospital would allow for the expansion of healthcare services in our town. With a new hospital, we would receive care at a higher level similar to other urban areas. Even though we like to think of our community as rural, on busy weekends we function like a much larger community and we need our basic services such as healthcare to match.

Building a hospital in Nevada while the current hospital remains open ensures no change in care while the hospital is being built. This two-campus model seems to be a great fit for our community.

In conclusion, I support the establishment of the hospital district and the construction of the new hospital. This project represents an opportunity to improve the health, wellbeing, and prosperity of our community. I am excited about the positive impact this would have on our region.

Thanks for taking the time to read this letter.

Sincerely,

Steve Brooks 

[Community Member's Name]

From: Ben Johnson <bqjohnson@gmail.com>
Sent: 6/25/2024 1:20:33 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: June 26, 2024 RPC Agenda Item #3 - Public Comment
Attachments: [Barton New Hospital Support Letter 06.24.24.pdf](#)

Dear TRPA,

Attached, please find my public comment in regards to the June 26, 2024 RPC Agenda Item #3.

Kind regards,

Ben

--
775.848.6199

June 25, 2024

Via Electronic Mail: publiccomment@trpa.gov

TRPA Regional Planning Committee

Vince Hoenigman, Chair
128 Market Street
Stateline, NV 89410

RE: June 26, 2024 RPC Agenda Item #3 | Douglas County South Shore Area Plan

Chairman Hoenigman,

I am writing to express my support for the establishment of a hospital district and the construction of a new hospital in the Tahoe-Douglas region. As a resident of Douglas County, I believe that a new hospital would bring invaluable benefits to our small rural community, significantly enhancing the quality of life and healthcare services available to us.

The presence of a modern hospital would allow for the expansion of healthcare services in our town. With a new hospital, I hope our community can receive care at a higher level similar to other urban areas. Even though we like to think of our community as rural, on busy weekends we function like a much larger community and we need our basic services such as healthcare to match.

Building a hospital in Nevada while the current hospital remains open ensures no change in care while the hospital is being built. This two-campus model seems to be a great fit for our community.

In conclusion, I support the establishment of the hospital district and the construction of the new hospital. This project represents an opportunity to improve the health, wellbeing, and prosperity of our community. I am excited about the positive impact this would have on the lake portion of Douglas County.

I appreciate your time in considering my perspective.

Sincerely,



Ben Johnson
Zephyr Cove, NV

From: Juraj Sojka <juraj@visitlaketahoe.com>
Sent: 6/25/2024 11:23:57 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: 6/26/2024 Regional Planning Committee Agenda | Item No 3
Attachments: [Letter of Support - Juraj Sojka LTV.A.pdf](#)

Hello,

Please see the attached letter of support for agenda item No.3 as part of the public comment.

Sincerely,



Juraj Sojka
Director of Tourism

(775) 589-2937

75 US-50, PO Box 5878
Stateline, NV 89449



Awe and then Some



TRPA Regional Planning Committee

RE: Agenda Item #3 | Douglas County South Shore Area Plan

Dear Chairman Hoenigman,

I am writing to express my support for the establishment of a hospital district and the construction of a new hospital in the Tahoe Douglas region. As a resident of Douglas County, I believe that a new hospital would bring invaluable benefits to our small rural community, significantly enhancing the quality of life and healthcare services available to us.

A healthcare facility would be far more beneficial for the long-term wellbeing of our community as compared to the possibility of another hotel or casino. A hospital not only supports health and wellness but also fosters a sense of security and stability.

The presence of a modern hospital would allow for the expansion of healthcare services in our town. With a new hospital, we would receive care at a higher level in line with many urban areas. Building a hospital in Nevada while the current hospital remains open ensures no change in care while the hospital is being built. And the outpatient services in California will continue to be offered to our community for those who prefer to see their doctor in California. I don't see any reason this wouldn't be supported by our community.

In conclusion, I support the establishment of the hospital district and the construction of the new hospital. This project represents an opportunity to improve the health, wellbeing, and prosperity of our community. I am excited about the positive impact this would have on our region.

Thank you for considering my perspective. I trust that the TRPA will recognize the importance of this initiative and support its implementation.

Sincerely,

A handwritten signature in black ink that reads "Juraj Sojka".

Juraj Sojka

Director of Tourism

VisitLakeTahoe.com

PO Box 5878 | 75 Hwy 50 | Stateline, NV 89449 | (775) 588-5900

From: Tobi Tyler <tylertahoe1@gmail.com>
Sent: 6/25/2024 9:37:14 AM
To: Cindy.Gustafson <cindygustafson@placer.ca.gov>; Hayley Williamson <hayley.a.williamson@gmail.com>; Shelly Aldean <shellyaldean@gmail.com>; fvaguilar@sos.nv.gov <fvaguilar@sos.nv.gov>; Ashley Conrad-Saydah <ashleyc@alumni.princeton.edu>; Belinda Faustinos <belindafastinos@gmail.com>; Cody Bass <cbass@cityofslt.us>; Meghan Hays <Meghan.hays9@gmail.com>; Alexis Hill <AHill@washoecounty.us>; Vince Hoenigman <vhoenigman@yahoo.com>; James Settelmeyer <JSettelmeyer@dcnr.nv.gov>; Brooke Laine <blaine@cityofslt.us>; Wesley Rice <wrice@douglasnv.us>; Alexandra Leumer <TRPALeumer@yahoo.com>; Julie Regan <jregan@trpa.gov>; Marja Ambler <mambler@trpa.gov>; Public Comment <PublicComment@trpa.gov>
Cc: Jacob Stock <jstock@trpa.gov>; Kmoneil <Kmoneil@douglasnv.us>;
Subject: Douglas County South Shore Area Plan
Attachments: [Sierra Club South Shore AP comments 619.24.pdf](#)

Governing Board Members and staff,

Please read and consider the attached comment letter from the Sierra Club's Tahoe Area Group that I sent last week to Douglas County staff after their June 13 South Shore Area Plan meeting. The South Shore Area Plan is scheduled to be discussed at the TRPA Regional Planning Committee meeting tomorrow.

Tobi Tyler
Sierra Club's Tahoe Area Group



Date: June 19, 2024

Kate Moroles-O'Neil, Principal Planner
Douglas County Community Development
1594 Esmeralda Ave, Minden, NV 89423
Via email: kmoneil@douglasnv.us

Tahoe Regional Planning Agency
Regional Plan Implementation Committee and TRPA staff
128 Market St, Stateline, NV 89410
Email: jregan@trpa.gov, kcaringer@trpa.gov

Subject: Douglas County South Shore Area Plan Town Hall

Representing the Tahoe Area Group of the Sierra Club, please see the following comments on Douglas County's South Shore Area Plan amendments presented to the public on June 13, 2024.

The Sierra Club objects to the proposed 85 feet of height for the new hospital in Highway 50 next to Kahle Drive. This astounding height is beyond what is allowed by the Tahoe Regional Planning Agency (TRPA) in their Phase 2 housing amendments, which is being contested by the Mountain Area Preservation. Although the December 2023 Phase 2 amendments are being challenged in court, the building must not "[exceed a total building height of 56 feet.](#)" Please revise the height maximum for the proposed hospital.

The height for a new hospital in this location is also unwarranted given the much lower population located in the Douglas County portion of the Tahoe Basin, [5,600 in 2020](#), versus a population of over [30,000](#) in the El Dorado County portion surrounding the current Barton Hospital. It would make much more economic and environmental sense to expand the Barton Hospital given the population disparity in these two Counties within the Tahoe Basin. It also makes more sense from a scenic standpoint since the site in Stateline is much closer to the Lake and would block views of Lake Tahoe. Building a massive hospital in Douglas County would only increase the Vehicle Miles Traveled (VMT) in the Basin and create more nightmarish traffic gridlock and further environmental degradation to Lake Tahoe.

The hospital proposed at Stateline is in formerly SEZ ([previously Kahle Meadows](#)) habitat. As such, the proposed site will be prone to flooding and interception of groundwater if underground facilities are planned. The nearby Tahoe Beach Club was allowed to build an

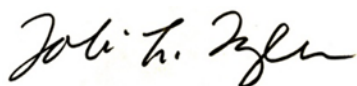
underground facility and is currently undergoing severe problems groundwater interception and requires pumping to remove the groundwater, creating greenhouse gas emissions. If the proposed hospital plans include underground parking or other underground facilities, these plans should be examined carefully by an independent hydrogeologist. Furthermore, if any pumping of underground facilities will be required, this plan should be eliminated and no underground facilities should be permitted.

The Sierra Club also objects to the proposed South Shore Area Plan amendments that would remove current affordable housing in lower Kingsbury and expand the town center to include more tourist accommodations and entertainment. This is completely nonsensical and antithetical to the lengthy, voluminous discussion surrounding the need for affordable housing in the Basin, for which the TRPA has proclaimed is the alleged purpose of TRPA's housing amendments. The 30 long-established mobile homes on Manor Drive off Kingsbury Grade Road provide necessary affordable housing. Conversion to a "Commercial Town Center" would displace people who likely work at minimally paying jobs in the casino area and require them to move out of the Basin. This would in turn require them to commute to work, further increasing the VMT at a time when reducing VMT is necessary and required. The people living in this mobile home park should be allowed to stay. We do not need additional tourist accommodations and entertainment in this area.

We additionally ask that the amendments to the South Shore Area Plan (SSAP) be provided to the public in a red-line, strike-out version on the County's website. Without this, it is impossible for people to distinguish between what was previously in the plan from 2013 and what is new. Please make it easier for the public to understand what is being proposed.

Please also confirm that no federal money is involved in any of the proposed projects that would result from these amendments to the SSAP.

Thank you for your consideration of these comments for the South Shore Area Plan amendments.

A handwritten signature in black ink, appearing to read "Tobi Tyler". The signature is fluid and cursive.

Tobi Tyler, Sierra Club's Tahoe Area Group Vice Chair

Email: tylertahoe1@gmail.com

From: Ellie <tahoellie@yahoo.com>
Sent: 6/23/2024 9:11:02 PM
To: Public Comment <PublicComment@trpa.gov>
Cc: Cindy.Gustafson <cindygustafson@placer.ca.gov>; Vince Hoenigman <vhoenigman@yahoo.com>; Alexandra Leumer <TRPALeumer@yahoo.com>;
Subject: Comment for the 6-26-2024 Regional Plan Committee: Douglas County South Shore Area Plan
Attachments: [GB Reg Plan COMMITTEE 6-26-2024 DC South Shore Area Plan comments .pdf](#)

Please accept this Public Comment for the 6-26-2024 Regional Plan Committee: Douglas County South Shore Area Plan ~Ellie Waller

Why is the Douglas County South Shore Area Plan (SSAP) being fast-tracked?

Opportunities for Public Input (dates are tentative and subject to change):

- Douglas County Townhall Meeting—June 13
- TRPA RPC Informational Presentation—June 26
- Douglas County Planning Commission—July 9
- Douglas County Board of County Commissioners—August 1
- TRPA Advisory Planning Commission—August 14
- TRPA Regional Planning Committee—September 25
- TRPA Governing Board—October 23

Page 473 of the TRPA Governing Board Packet <https://www.trpa.gov/wp-content/uploads/June-26-Governing-Board-Packet.pdf> A Two-page staff report is insufficient.

The 90 page SSAP surely has more content for review than a two-page staff report. Several questions starting on Page two of this comment outline many of the issues. A link to the SSAP wasn't even provided. I supplied below for your review.

https://www.douglascountynv.gov/news/what_s_new/south_shore_area_plan_townhall

https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_12493019/File/SSAP_update_combined_clean.pdf

Also, Design Guidelines are being amended. How many people in the public even know to look for the Design Guidelines. Link provided below to 57 pages document.

[https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_12493019/File/S-Shore Design-Standards-Guidelines_clean.pdf](https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_12493019/File/S-Shore_Design-Standards-Guidelines_clean.pdf)

1.2 Intent of Design Standards and Guidelines

These design standards and guidelines are intended to aid in the development and approval of a project design, for the benefit of the patron, the businessman and the community at large. The adopted design guidelines and standards are not intended to inhibit innovative design. Rather they are intended to allow individual property owners freedom of expression while establishing and maintaining an overall unifying character and image for the entire community.

- 1) Who on The Tahoe Regional Planning Agency staff besides Jacob Stock, along with Douglas County staff drafted the SSAP in collaboration with Ascent Environmental Consulting? The citizens of the Township deserve to know who is planning their future. Any others from the Township should also be disclosed as well as any other agencies, non-profits, etc..
- 2) When will the Initial Environmental Checklist be available for public review? The public should have an opportunity to understand the level of analysis that will be required.
- 3) Barton Hospital, a hospital of this magnitude, was not proposed in the Casino Corridor or envisioned in the Regional Plan Update (RPU) 2012. **This is new territory** in my opinion, and no tiering from the RPU is available to analyze impacts.

Healthcare Subdistrict definition. Where in Douglas County Muni-Code is this defined? When will Title 20 need to be amended?

Healthcare Subdistrict definition. Where in TRPA Code is this defined? When will TRPA Code of Ordinances need to be amended? Where is "subdistrict", in general, defined for the the lay person trying to understand, under-lying zoning, then a "subdistrict overlay", etc.?

One impact is already known with the hospital project: groundwater intercept issues were discovered during excavation. Now an amendment has been generated for the Town Centers.

Proposed amendment: Allowing groundwater interception for projects in town centers if the project is designed to prevent adverse off-site impacts.

My opinion, this will require extensive research and design and analysis for the known issue. Demolition of the Lakeside Inn seemed appropriate. Why was extensive excavation approved by TPRA for a project that has not been approved allowed?

The Barton Hospital is a known future project. What level of analysis should be required? I believe an Environemntal Impact Study is most appropriate.

The Difference Between an Environmental Assessment (EA) and an Environmental Impact Statement (EIS).

In general, under the National Environmental Policy Act (NEPA), the difference between and EA and an EIS is simple. An EA is a concise review document taking into account the purpose and need of the proposal, any alternatives, and a brief review of the impacted environment. An EA will either result in a Finding of No Significant Impact (FONSI) or if significant environmental impacts appear likely, an EIS. The FONSI determination is made without consideration of any cumulative impacts or geographic context.


An EIS is a much more comprehensive document. An EIS requires everything an EA would require while also requiring a much more comprehensive discussion of the reasonable alternatives, and a "hard look" at the cumulative impacts of the proposal along with all existing and reasonably foreseeable future development within the project area.

The use of an EA rather than an EIS means that an agency future **is not required to assess the cumulative impacts of the proposal along with all other existing and reasonably foreseeable development nearby.** In a practical sense, **EAs function as piecemeal planning** due to their limited scope, while EIS's function more as holistic, landscape-level planning.

4) Even more outrageous, and of major concern, TRPA “will” be including the Phase 2 Housing Amendments in the SSAP as part of this process. Douglas County, to my knowledge, has not discussed at any public meetings, the Phase 1, let alone Phase 2 affordable, achievable, workforce housing etc. standards, proposed and approved by TRPA. Why is it necessary to include in this amendment package? Douglas County Township residents should have the opportunity to weigh-in before TRPA willy-nilly (1. Whether you want it or not. 2. In an unplanned, haphazard fashion.) adds this to the SSAP.

HOUSING MARKET

Information on the housing market in the South Shore Area Plan includes sales data, residential development potential, and vacation home rentals and timeshares.

 **2016 SALES DATA**

The 2016 sales data from the Douglas County Assessor reports on sales of single-family detached dwelling units (Code 200) by Township and Range. The South Shore Area Plan is located within Township 13 and Range 18 (T/R 1318).

There were 81 single-family home sales during 2016 in T/R1318. The highest price for home sales during 2016 was \$6,500,000 and the lowest price was \$288,414. There was only one sale below \$300,000.

The median sales price was \$670,000 and the average sales price for single-family homes was \$892,968. None of the 2016 sales transactions took place within the boundary of the South Shore Area Plan. Table 9 provides the single-family sales data for 2016.

Why is the SSAP using 2016 Sales Data?

5) 1.4 Vision for the South Shore: Examples from the Design Guidelines

1) The South Shore is envisioned as a central destination that provides full services for tourist and permanent residents and offers unique experiences related to the many outdoor recreation possibilities that surround the area. The revitalization of the South Shore will catalyze the transformation from a declining gaming economy into a sustainable outdoor tourism recreational destination by incorporating active streetscapes featuring strolling, shopping, entertainment and outdoor food and beverage opportunities. In addition, transit and alternative travel will provide an essential part of the envisioned destination resort experience resulting in significant environmental gain and improved scenic quality.

No mention of a hospital complex. Whose Vision? Is this the same as or very similar to the STAR 2011 South Shore Vision Plan.

2)

Appendix A: Comparison of Douglas County Design Criteria and Improvement Standards (DCDCIS) to the South Shore Design Standards and Guidelines

	Does the DCDCIS standard apply to the South Shore Area?	Replacement standard if DCDCIS standard does not apply to the South Shore Area.
2.4.4	Commercial developments within the Towns of Minden and Gardnerville, and throughout the Carson Valley shall use interlocking pavers, stones or other similar treatments to denote driveway approaches to a minimum depth of 10 feet.	NO Two-way traffic along Hwy 50 (or Main Street when Hwy 50 is realigned) is encouraged.

When is Hwy 50 re-alignment going to be discussed with the public?

6) TRPA is the lead Agency for project approval for the Douglas County South Shore Area Plan (SSAP). This concept needs to be explained to the general public as this is the only Area Plan in the Tahoe Basin that TRPA is the lead.

The 2012 Regional Plan Update intended to have local jurisdictions create and manage Area Plans to allow TRPA to address more regional issues. The statement “to create one-stop-shopping for homeowner improvements” is misleading. The Douglas County SSAP has TRPA/applicants representatives managing, as the lead agency, all types and sizes of projects.

My opinion, the Douglas County SSAP does not comply with the “more regional role” the Compact originally intended with TRPA being a lead agency (see Chapter 13 of the TRPA ordinances for further explanation of lead agency.)

A list of the limited approval by Douglas County needs to be clarified for the public.

“If the lead agency is TRPA, the Area Plan shall require conformity approval under this section by TRPA only. No approval by any other government, such as a local government, shall be required.”

7) 2008 Kingsbury Vision was acknowledged. Provide a link to this document for the public and a presentation of the intent of the plan that is stale and needs to be discussed and/or revised.

8) The South Shore Vision Plan 2011 was mentioned and was prepared by Design Workshop for South Tahoe Alliance of Resorts STAR. Be consistent in spelling out acronyms as the public probably doesn't know who they are. South Tahoe Alliance of Resorts (STAR): Lewis S. Feldman, Feldman Thiel LLP, John McLaughlin, Edgewood Companies, community leaders, to name a few. STAR requested The South Shore Vision Plan which can be found on the Douglas County Website. Another plan that a presentation should be included and be provided to public as part of the SSAP amendment process

<https://www.douglascountynv.gov/cms/one.aspx?portalId=12493103&pageId=15724503>

https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_12493019/File/County%20Manager/RDA2/South%20Shore%20Vision%20Plan%20October%202011.pdf

8) A robust discussion of the proposed new policies needs to be rigorously discussed during public meetings.

9) The Tahoe Douglas Area Plan (TDAP) was mentioned for future update. When might the TDAP be amended if it's in draft form, or drafted for public comment and review?

Table 16 mentions two Area Plans : South Shore Area Plan (SSAP) and Tahoe Douglas Area Plan (TDAP) but only one is being amended: the SSAP. The amendments confusion abounds. The amendment package is specific to SSAP but slipping in the TDAP is confusing.

10) Will Barton bank the Tourist Accommodation Units (TAU) from the Lakeside sale? Who owns the TAUs which are eligible for the TRPA conversion program which needs to be explained to the public. Many more questions forthcoming at subsequent meetings.

From: somis5@cs.com <somis5@cs.com>
Sent: 6/23/2024 7:26:07 AM
To: Cindy Gustafson <cindygustafson@placer.ca.gov>; Hayley Williamson <hayley.a.williamson@gmail.com>; Shelly Aldean <shellyaldean@gmail.com>; fvaguilar@sos.nv.gov <fvaguilar@sos.nv.gov>; Ashley Conrad-Saydah <ashleyc@alumni.princeton.edu>; Belinda Faustinos <belindafaustinos@gmail.com>; Cody Bass <cbass@cityofslt.us>; Meghan Hays <Meghan.hays9@gmail.com>; Alexis Hill <AHill@washocounty.us>; Vince Hoenigman <vhoenigman@yahoo.com>; James Settelmeyer <JSettelmeyer@dcnr.nv.gov>; Brooke Laine <blaine@cityofslt.us>; Wesley Rice <wrice@douglasnv.us>; Alexandra Leumer <TRPALeumer@yahoo.com>; Julie Regan <jregan@trpa.gov>; Marja Ambler <mambler@trpa.gov>; Public Comment <PublicComment@trpa.gov>
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Subject: Barton Hospital

Dear TRPA Board Members and TRPA Regional Planning Committee Members:

I am writing to oppose the proposed amendments to the Douglas County Area Plan in order to allow Barton Hospital to move from South Lake Tahoe, CA to Stateline, NV based upon the amount of information and zero level of public discourse that has occurred at this time.

Every time I hear Julie Regan speak, she almost always states that the TRPA has multiples of goals and that it has to harmonize all of those goals with no one goal having priority. What Ms. Regan never says is that the TRPA goals are conflicting in many ways. Any Management 1 student of any worth knows that if you have conflicting goals you first must prioritize those goals in order of importance when making decisions - or you will have organizational chaos.

The problem is that the TRPA never prioritizes its goals and never harmonizes them either. So Ms. Regan and the TRPA are constantly selling sugar water and cotton candy to the general public about how great the TRPA is - yet never delivering on the promise.

Even worse, the TRPA constantly does back room deals like it has on Barton Hospital so the whole TRPA process becomes a farce.

With Barton Hospital, the case is presented of a local community hospital picking up stakes from the 30,000 population community which utilizes the hospital and raised the funds for the hospital and moving miles away on a very congested highway to a community of 3,500 in another state.

Let's discuss the TRPA's poor decision making and side swiping of harmonizing its goals to accomplish this move.

1. **Minority and Underserved Populations.** In 2023, the TRPA held a very long facilitated seminar for Board members on Transportation Equity. TRPA had spent a large amount of money to hire an outside consultant and at least hundreds of hours in staff time to study how it needed to better serve the minority and low income residents of Lake Tahoe with better transportation. Board members were gushing with comments about how these residents simply must be served far better (I particularly remember Ms. Aldean and Ms. Faustinos pontificating that this "transportation equity" must absolutely come about). So here we are with the TRPA's wanting to allow Barton Hospital to move to Stateline.

Where is the "transportation equity" in such a move? How is it "transportation equity" to force lower income residents of Myers to get on a bus that rarely operates to get healthcare at Stateline instead of the "Y"? Board members - especially Ms. Aldean and Ms. Fustinos - will you remember about your comments on "transportation equity" OR were they just empty words to sound compassionate at the time?

At the very least, will the entire TRPA Board and Ms. Regan admit for once that it cannot harmonize the goal of transportation equity with Barton Hospital's moving to Stateline, Nevada? Can the TRPA Board and Ms. Regan admit to the public and themselves that no aspect of "transportation equity" is achieved by moving Barton from its 30,000 population base in South Lake Tahoe to Stateline's 3,500 base?

2. **Affordable Housing** The TRPA is constantly saying that affordable housing is one of its major goals for Lake Tahoe. The Lakeside Inn and Casino site could have been an absolutely amazing site for affordable housing. Instead, in a back room deal, the TRPA granted Barton a permit to demolish the Lakeside Inn - which could have, on an interim basis at the very least, been used for affordable housing. Yet there was NO public discussion about the use of the former site at all. Unelected TRPA bureaucrats and naive staff members believe they know better than the people who live at Tahoe. The TRPA and Barton precluded such a discussion from taking place as a result of their back room deal. Now we have yet again a big hole in the ground just as on the California side of the state line.

At the very least, will the entire TRPA Board and Ms. Regan admit for once that it cannot harmonize the goal of affordable housing with Barton's moving to Stateline, Nevada UNLESS Barton is willing to turn its current property into a site for affordable housing?

3. **VMTs** Since December 31, 2023, the TRPA has been in violation of its own standards for vehicle miles traveled ("VMTs") at Lake Tahoe. Some of the TRPA Board is trying to paper over this violation.

The moving of Barton Hospital from South Lake Tahoe will create thousands of new vehicle trips and thousands of additional miles driven at Lake Tahoe as a result of the 30,000 people in Barton's service area in California needing to travel miles north to Stateline, Nevada for medical care - trips which are new and additional and have not happened before.

There needs to be a very definitive traffic study performed on this potential move and not the sham type of study that was performed for the Stateline Event Center showing that ZERO additional parking was needed for a 5,000 seat center.

At the very least, will the entire TRPA Board and Ms. Regan admit for once that it cannot harmonize the goal of reducing VMTs at Lake Tahoe with moving Barton Hospital to Stateline, Nevada? Can the TRPA Board and Ms. Regan admit to the public and themselves that no aspect of VMT reduction is achieved by moving Barton from its 30,000 population base in South Lake Tahoe to Stateline's 3,500 base, indeed VMTs are INCREASED?

4. **Bike Lanes** A long standing TRPA goal has been to have a dedicated bike lane around the Lake. The TRPA plan in the recent past was to reduce much of Hwy 50 to two lanes in order to add a bike path behind a cement berm. This is all laid out in the TRPA Lake Tahoe Transportation Plan. This TRPA Plan mobilized the vast majority of the East Shore residents to oppose this plan before TRPA and NDOT. Blessedly, the Governor of Nevada called a halt to this plan in November, 2023 - at least partially as a result of the mobilization of the East Shore community. And now, Douglas County has declared Hwy 50 a four lane evacuation route. But has TRPA heard the East Shore community or is it just biding its time and lurking in the shadows to try to bring back this evacuation disaster?

Now comes the Barton Hospital proposed move. In what world can you have a hospital on a Hwy 50 with greatly reduced capacity and two lanes for much of the road? In what can only be described as Orwellian "government", the TRPA was still pushing for the bike lane on Hwy 50 and resultant lane reductions when it knew that Barton Hospital wanted to move to Stateline.

At the very least, will the entire TRPA Board and Ms. Regan admit for once that it cannot harmonize the goal of a bike lane around the lake and resultant Hwy 50 lane reductions with Barton Hospital's moving to Stateline, Nevada? Can the TRPA Board and Ms. Regan admit to the public and themselves that no aspect of a bike lane around the Lake directly on Hwy 50 be achieved by moving Barton from its 30,000 population base in South Lake Tahoe to Stateline's 3,500 base?

5. **Reduced Health Care Outcomes** A fundamental precept of health care delivery is that victims need to receive emergency medical care as soon as possible. The probability of a successful recovery from a heart attack reduces every minute that health care delivery is delayed beyond four minutes.

Barton wants to move miles away from its 30,000 patient base on a highly congested Hwy 50 and an even more highly congested and narrow Stateline casino corridor. This will automatically delay emergency vehicle response times.

Is there any kind of equity in this?

At the very least, will the entire TRPA Board and Ms. Regan admit for once that it cannot harmonize the goal of better health care around the lake and reduced emergency vehicle response times with Barton Hospital's moving to Stateline, Nevada? Can the TRPA Board and Ms. Regan admit to the public and themselves that it is very hard to conjure up reasons why INCREASED emergency vehicle response times due to the Barton move equate to any goal of better healthcare for the Lake?

This email addresses quite a few matters that the TRPA says are its goals: transportation equity, service to minority and poor communities, affordable housing, reducing traffic, safe evacuations and timely delivery of health care in emergencies. Not one of these goals is furthered by the moving of Barton Hospital many miles to the north to a different state.

So is Ms. Regan being most disingenuous when she says the TRPA must harmonize all of its goals? How can she NOT be and advocate that you approve this amendment to the area plan? How can any of you NOT have very serious issues with this move given your stated goals?

Will this matter turn out to be typical back room dealing as it usually is by the current folks in charge of the TRPA?

I respectfully request that these comments and email be placed in the record for the June 26, 2024 TRPA Board meeting and the TRPA Regional Planning Committee.

Brett Tibbitts
Glenbrook, NV