WELLS BARNETT ASSOCIATES
PLANNING + ECONOMICS

November 7, 2025

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Tahoe Regional Planning Agency
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**RESPONSE TO VERIFICATION OF LAND COVERAGE, LAND USES, & RECREATION CAPACITY / LAKESIDE PARK ASSOCIATION / 4041 LAKESHORE BOULEVARD, CITY OF SOUTH LAKE TAHOE, CALIFORNIA / ASSESSOR PARCEL NUMBERS 029-601-001 & 029-601-002 / TRPA FILE NUMBER VBOC2025-0203**

Dear Julie,

Thank you for giving us an opportunity to review your draft verification results letter for Lakeside Park Association (LPA) prior to formal issuance. We are pleased that you have verified most of the uses in our application. We do, however, wish to discuss your findings with respect to the small number of land uses that you were unable to verify.

**Recreation Capacity**
Regarding the results for recreation capacity, we understand that since Lakeside Beach is not operated by a state or federal entity that PAOTs cannot be applied to the Beach Recreation Use. Conversely, WBA requests that the results letter be revised to state that *Beach Recreation PAOTs at Lakeside Beach will not be required in the future should LPA pursue expansion of their existing beach area*. Please understand that LPA's beach is open to the public, operated by a quasi-public entity (Lakeside Park Mutual Water Company), that is open for use by the public (albeit for a fee). Please include this description in the Recreation Capacity results narrative.

**Marina/Boat Rentals**
We understand that boat rentals at LPA's marina are a legally existing "grandfathered" accessory use that may predate TRPA's regulatory authority. Please confirm our understanding that, provided the use is not substantially modified, this use may continue to operate. LPA has no immediate plans to change this use but is aware that if modifications to the boat rental operation were desired, that a TRPA permit would be required.

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**Pier**

WBA asserts that the structure TRPA has labeled either a breakwater or jetty is actually both, AND a pier. Pursuant to the TRPA Code of Ordinances Definitions Chapter, a breakwater, jetty, and pier are defined as follows:

> *Breakwater*: A man-made structure that diminishes the force of waves.
>
> *Jetty*: A man-made barrier in the water that is usually but not always perpendicular to a shoreline.
>
> *Pier*: A fixed or floating structure intended as a landing or temporary mooring for watercraft and either extending from the backshore to at least 10 feet beyond the line marking the high water elevation of a lake, or extending into Lake Tahoe to a depth of 6,226.1 feet Lake Tahoe Datum, or a functionally similar depth on other lakes in the region.

LPA's structure located directly north of the marina fits all three of the above definitions and specifically includes functions above that of a jetty or breakwater, including that of a pier. It is a distinctly separate structure from the marina facility to the south. Our verification cover letter described the nature and location of historic piers on the property as they were created, removed, and relocated from north to south, culminating in the creation of the marina, boat ramp, and the structure located to the north of the marina which we contend fits the definition of a pier, particularly with respect to the ability to *moor watercraft to it.* If, for example, the marina did not exist, boats would continue to be able to land at both sides of the sheet pile bulkhead support structure and allow their operators to access landward facilities.

WBA researched other lakefront operations with configurations like LPA's marina and pier and found at least one marina/pier operation with a similar lakezone structure. The Tahoe City Marina Expansion Project permit (APN 094-090-09 / TRPA File No. 20061481) includes Special Condition 1 that authorizes *"expansion to the 728-foot public pier with breakwater foundation."* This condition continues to describe the structure of the pier, including its "…*sheetpile wall section*…" Further permit conditions describe the pier's dimensions and appurtenances. Given the similarity between the two operation's lakezone structures, and the functions attributed to LPA's (pier) structure, WBA finds no reason why this structure should not be verified as an existing pier as TRPA has done for at least one other site.

WBA thanks you for your diligent research and hard work towards completion of the verifications. As these results will determine LPA's baseline condition necessary to be known to pursue future significant development of its property, we request that you consider revising your draft letter to address our concerns expressed above.

We look forward to bringing this verification process to a conclusion. If needed, please feel free to contact me to discuss the above matters.

Sincerely,

Jon Paul Kiel
Senior Associate
Wells Barnett Associates

C: Andrew Englehardt, President, Lakeside Park Mutual Water Company
Judy Goddard, LPA
Lyn Barnett, Senior Principal, WBA