

July 16, 2022

Statement of Appeal July 16, 2022

(Notice of Appeal Filed June 16, 2022)

Tahoe Transportation District/Washoe County School District 771 Southwood Blvd. & 915 Northwood Blvd., Incline Village, Washoe County, Nevada; APNs 132-201-02 & 132-012-05; TRPA File Number ERSP2021-0673.

Definitions

FTA = Federal Transit Administration

NEPA = National Environmental Policy Act

OES = Old Elementary School Property at 771 Southwood Blvd, Incline Village, NV

Staff Reports = TRPA SUP Staff report findings and recommendations presented at meetings November 18, 2021, December 16, 2021, and May 26, 2022, leading up to the TRPA Hearing Officer approval of the SUP

SUP = Special Use Permit - Approved by the TRPA Hearing Officer on May 26, 2022 - TRPA File Number ERSP2021-0673.

TTD = Tahoe Transportation District

TRPA =Tahoe Regional Planning Agency

WCSD = Washoe County School District.

Appellants request the reversal of the SUP approval and staff reports for the reasons listed below:

1. The Hearing Officer approval of the SUP approval process and findings connected with the TRPA Staff Reports – Staff Analysis finding F, and the H. 2. Chapter 21 Special Use Findings (a) and (b) (**Attachments B, D and F**) was arbitrary, capricious, and lacked substantial evidence and data to support the required findings. The Hearing Officer ignored first-hand subject-matter expert property-owner public comments over the course of three multi-month public meetings, which demonstrates prejudicial abuse of discretion.

1A. Finding Item H. 2. (a) states: *The project, to which the use pertains, is of such a nature, scale, density, intensity, and type to be an appropriate use for the parcel on which, and surrounding area in which, it will be located.*

The TRPA and TTD failed to provide substantial evidence that the nature of the proposed project was of *a nature, scale, density, intensity, and type to be an appropriate use for the parcel on which, and surrounding area in which, it will be located*; instead, simply stating that, *“The nature of the proposed project may be consistent with the public-service uses permissible within the Area Plan and transportation goals.”*

This weak TRPA justification alluding to the Washoe County Tahoe Area Plan’s permissible uses fails to determine and assess the true *nature, scale, density, and intensity of effects* on the surrounding area in specific connection with either parcel. Therefore, the finding is arbitrary, capricious and an abuse of prejudicial discretion.

1B. Finding Item H.2. (b) states: *“The project to which the use pertains, will not be injurious or disturbing to the health, safety, enjoyment of property, or general welfare of persons or property in the neighborhood, or general welfare of the region, and the applicant has taken reasonable steps to protect against any such injury and to protect the land, water, and air resources of both the applicant’s property and that of surrounding property owners.*

The use of the property at 771 Southwood Blvd in connection with this SUP and any planned future use as a TTD regional mobility hub is highly controversial. The considerable number of SUP opposition comments (more than 65) submitted by firsthand subject-matter residents and property owners, alleging adverse neighborhood impacts related to public safety, traffic, density, noise, and parking represented reasonable and substantial evidence. This then outweighed the “evidence” provided by TRPA to substantiate the finding that the project *will not be injurious or disturbing to the health, safety, enjoyment of property, or general welfare of persons or property in the neighborhood, or general welfare of the region.* TTD failed to assess both the local and the regional welfare.

Over the course of the three SUP public hearings, these 65+ public comments should have been given the consideration and weight of reasonable and substantial evidence, but the TRPA Staff and the Hearing Officer arbitrarily and capriciously ignored them.

1C. VMT Finding Item F states: *Traffic – Per a memo from Carl Hasty of the TTD, (Attachment I), The Tahoe Transportation District (TTD) prepared a Vehicle Miles Traveled (VMT) analysis, as directed by TRPA transportation planning staff. The VMT analysis memo among other claims, shows that the proposed project will result in an overall reduction in regional daily VMT of approximately 557 miles. The VMT analysis presumes that approximately 70% of the trips will access the site from along the North Shore, 11% from out the Basin to the North, and 19% coming from the South.*

This VMT “Traffic Analysis” is not a “Traffic Study.” It fails to specifically discuss or link its purpose to each of the two parking locations. It is presumptive, arbitrary, and capricious. It requires the acceptance of a crystal-ball analysis with regard to ESE users’ trip start-and-end locations, user physical entry points, and does not provide or discuss factual data regarding trip user’s actual trip activities before and after ESE parking use.

The analysis fails to specifically discuss how the project will *not* be injurious or disturbing at each of the two parking locations. In fact, the TRPA did not require a “**traffic study**” of congestion, pedestrian crossing safety, or impacts to adjacent intersections, among other concerns. A traffic study is required to establish the impacts on neighborhood public safety, traffic, and density.

Additionally, the VMT analysis fails to discuss or provide accurate parking capacity/availability data in the area of the East Shore, Highway 28, or Incline Village. It fails to demonstrate and link any relationship whatsoever between the VMT Traffic Analysis and the determination that the nature of the proposed project *will not be injurious or disturbing to the health, safety, enjoyment of property, or general welfare of persons or property in either neighborhood, or in the region.*

2. TRPA Staff arbitrarily and capriciously added the term “**Transit Station**” to describe the **Special Use Permit “Purpose”** within staff reports (**Attachments B, D and F**), the findings and recommendations of which became part of the approved SUP. This action demonstrated prejudicial abuse of discretion on the part of the TRPA Staff and the Hearing Officer since the added term “**Transit Station**” was not the

requested “**Purpose**” stated within the TTD Application (Pages 5 and 9 – **Attach 1AA** – May 11, 2021 – Temporary Activities Activity Form).

Further, this devious arbitrary and capricious “change in use” was also an intensification of use on the part of the TRPA. It was not necessary to receive a Transit Station Permit for TTD legal temporary “parking” or to permit TTD the use of the 771 Southwood location as a “transit Stop.”

3. TRPA Staff arbitrarily and capriciously added the term “**Transit Station and Terminal**” to describe the SUP “**Purpose**” within staff reports (**Attachments B, D and F**) and created **Special Condition 1 (Attach AAA – TTD Permit Acknowledgement)**, which states “*This permit specifically authorizes the temporary operation of a “transit station and terminal” at the former Incline Elementary School campus (APN 132-201-02) and the current Incline Elementary School campus (APN 132-012-05)*”.

Transit Stations and Terminals are defined in the TRPA Code of Ordinances Table 24-1-A as: “*Passenger stations for vehicular and mass transit systems; also, terminal facilities providing maintenance and service for the vehicles operated in the transit system. The use includes, but is not limited to, buses, taxis, railway, and ferries. Outside storage or display is included as part of the use.*”

This action demonstrated prejudicial abuse of discretion on the part of the TRPA Staff and the Hearing Officer since the added term “**Transit Station and Terminal**” was not the requested “**Purpose**” stated within the TTD Application (Pages 5 and 9 – **Attach 1AA** – May 11, 2021 – Temporary Activities Activity Form).

Further, adding **Special Condition 1** intensified the “change in use” and was not at all necessary to allow TTD to obtain a legal temporary “parking” or “transit stop” at either location and especially as the action applies to 771 Southwood property, which is now subject to NEPA.

This action represented prejudicial abuse of discretion as it served to create a process foundation scheme to further assist TTD in justifying its planned use of the 771 Southwood property as a “Regional Mobility Center.”

TTD may have realized that the reasons it gave within its FTA Federal funding request (**Attachment I**) to help secure Federal funding to purchase 771 Southwood Blvd may have not been completely transparent, and may be considered incomplete information. In fact, NDOT and TTD claimed at the time, that “*the site has been used by TTD in agreement with the Washoe County School District as a seasonal **transit hub** for TTD’s popular East Shore Transit Service, when, in reality, the actual use was that of a 10-year inactive school campus with 8 years of TRPA regulatory noncompliant TTD parking and a non-permitted TTD Transit Stop.*”

Additionally, this obfuscation appeared in a July 29, 2020, Letter from NDOT to the FTA (**Attachment J1**) to secure the 771 Southwood Blvd funding. NDOT stated that, “*For the last nine years, Tahoe Transportation District has been using the Property for a seasonal transportation hub*”.

SUP **Special Condition 1 (Attachment AAA)** is an obfuscation of what is normally considered a Permit condition. These are usually special conditions such as “planning permissions” to mitigate or compensate for negative impacts. However, in the case of **Special Condition 1**, especially as it applies to 771 Southwood Blvd, TRPA arbitrarily and capriciously granted an intensified and expanded “change of

use” from the property’s past use, which was a school campus inactive for 10 years which TTD used for 8 years without a permit as a parking lot and transit stop.

If the TTDs’ and Washoe County School District’s actual stated SUP Application project intent was not that of *“Intercept parking for the East Shore Express shuttle service to SR 28 and Sand Harbor”* but rather to utilize the temporary permit process to seek a different intensified, expanded project purpose and description, the TTD and Washoe County School District should have stated such within their application. Otherwise, the application should have been returned to the TTD as “incomplete,” especially given the highly controversial NEPA regulated use of the property at 771 Southwood Blvd.

TRPA most assuredly would not have allowed any non-government applicant the luxury of enjoying an arbitrary and capricious expansion or addition without specific details as to the project purpose, description, and use. This is an indication that the TRPA applies different standards for their “Government Partners” than their public applicants.

The staff reports are not consistent, clear and or complete when describing the action recommended to the Hearing Officer. The various descriptions of the “Use” and “Purpose” appearing within the staff reports as they apply to both locations, and specifically 771 Southwood Blvd, are confusing to the public, inconsistent, arbitrary and capricious, and have led to prejudicial abuse of discretion on the part of TRPA Staff when drafting the permit language seemingly in whatever manner best fit the goals of the TRPA and TTD.

In fact, it is germane to this appeal to identify the various descriptions connected with 771 Southwood Blvd “Use” and SUP transportation-related project descriptions in the original NDOT/TTD grant funding application to the FTA in April of 2020. The interchangeable use seemed to be shaped to fit the need of the TRPA and TTD at the time of the original NDOT/TTD grant funding application in April of 2020:

- **Seasonal transit hub (Attachment J)**
The original FTA Federal funding application dated April 29, 2020, by the TTD for the purpose of purchasing 771 Southwood Blvd stated: *“This site has been used by TTD in agreement with the Washoe County School District as a seasonal transit hub for TTD’s popular East Shore Transit Service.”*
- **Transit Hub (Attachment J1)**
July 29, 2020, Letter for Funding 771 Southwood Blvd from NDOT to the FTA.
- **Intercept Parking (Attachment 1AA)**
The May 11, 2021, TTD SUP application describes the project request and use as: *“Intercept parking for East Shore Express shuttle service to SR 28 and Sand Harbor.”*
- **Transit Stop (Attachments B, D and F)**
Then, Page 1 “Project Description” of the related staff reports define the use as one of seven “transit stops,” i.e., *“The ESE serves seven transit stops along the route between Incline Village and Sand Harbor State Park.”*
- **Transit Service (Attachments B, D and F)**

Then, Staff report, Page 1 “Project Description” of the related staff reports refers to the property as a proposed “transit service.”

- **Intercept Parking and Transit Stops (Attachments B, D and F)**

Then, Staff report, Page 1 states: “The service has been operating for a number of years on a less-formalized basis. The current proposal is to officially allow the transit service to utilize these two locations as intercept parking and transit stops.”

- **Transit Station and Terminal (Attachments B, D and F)**

Then, Staff report, Page 2 states “The current proposal is to allow these two locations to be utilized as a Transit Station and Terminal as a temporary use, which allows the use of the sites for one season, with an option to extend for a second season.”

- **Transit Stop/Station (Attachments B, D and F)**

Then, Staff report page 4 Chapter 4 Required Findings A states: “The proposed use of these sites as a transit stop/station will assist in implementing the Transportation Policies of the Regional Plan related to Environment (to protect and enhance the environment, promote energy conservation, and reduce greenhouse gas emissions), and Connectivity (Transit).”

- **Transit Station - Intercept Parking Final SUP Permit Terminology (Attachment AAA)**

After these conflicting terminologies, the final Permit Project Use Description signed by Carl Hasty on May 26, 2022, states: “Temporary Use -Transit Station (Intercept Parking).”

- **Transit Station and Terminal (Attachment AAA)**

Special Condition 1 of the Final SUP Permit signed by Carl Hasty on May 26, 2022.

- **Stop (Attachment AA)**

This term was used by the TRPA Hearing Officer, who may have been attempting to minimize the project use description when answering questions by the Hearing Officer regarding the alleged violation of Chapter 6.2.

4. TRPA Violated its own Chapter 6.2. *JOINT ENVIRONMENTAL DOCUMENTS* which states:

For projects subject to the California Environmental Quality Act (CEQA), the National Environmental Policy Act (NEPA) or other state or local environmental review, TRPA shall, whenever feasible, coordinate its environmental review process with the local, state, or Federal process. Coordination would include joint activities such as scoping, selection of consultants, notice, and concurrent comment periods.

As stated by the TRPA Hearing Officer attorney during the May 26, 2022, SUP Public Hearing (**Attachment AA**), “the TRPA did not undertake its responsibilities as required under Chapter 6.2”.

AND

“In this case Section 6.2 just wasn’t triggered because we don’t have a joint agency approval process going on.”

Because the 771 Southwood property was purchased using FTA Federal funds via an application for funding in connection with a NEPA Categorical Exclusion (CE) Protective Property Acquisition request by the Nevada DOT on behalf of the TTD, the primacy for regulatory environmental review considerations rests with the FTA under NEPA.

This FTA primacy extends to the TRPA staff-created—and Hearing Officer approved—SUP “change of use” as connected with the intensified “use” as a “**Transit Station and Terminal**.”

During the May 26, 2022 Hearing Officer public meeting, the TRPA attorney erred in her reasoning justifying TRPA’s failure to follow Code Section 6.2 officer (Attach AA - Transcription) when she stated:

“The Initial Environmental Checklist for this project didn’t reveal any need for additional environmental review. And TRPA is the only agency that is approving this permit. Other agencies may have approved transportation plans or other things that are being implemented, and this “stop” is part of that. But this project approval just involves TRPA for this permit. So, when we have a situation where we have other Federal, State, and local agencies that also have an approval that will be required for the project, then we do coordinate the environmental review. Usually this includes a more extensive document—an EIR or EIS—and that’s something we do on a regular basis. But in this case Section 6.2 just wasn’t triggered because we don’t have a joint agency approval process going on.”

The TRPA Attorney’s opinion does not relieve the TRPA from the Chapter 6.2 requirement that TRPA “shall, whenever feasible, coordinate its environmental review process with the local, state, or Federal process.”

As explained by FTA’s Mr. Ted Matley in an email on June 7, 2021, to Appellant Doug Flaherty (**Attachment K**), a “Change of Use” triggers **an additional [required] review and determination under the National Environmental Policy Act (NEPA)** as stated:

From Mr. Ted Matley to Incline Village resident Doug Flaherty:

“The Categorical Exclusion (CE) determination that FTA Region IX issued allows the project sponsor to purchase the property using Federal funds, should the project sponsor choose to do so. The FTA CE determination does not include approval for any future changes to, or development of, the property.”

*“If the property is purchased using Federal funds, or should Federal funds be proposed to fund the development of or change the use of the property, **an additional review and determination under the National Environmental Policy Act (NEPA) is required to develop or change the use of the property.** We have confirmed with the project sponsor that they understand the limitations of the current FTA CE determination and that any future action to develop the property or **change the use will require additional NEPA analysis.**”*

23 CFR § 771.118 (C) (6) states: “Acquisition or transfer of an interest in real property that is not within or adjacent to recognized environmentally sensitive areas (e.g., wetlands, non-urban parks, wildlife management areas) and does not result in a substantial change in the functional use of the property or in substantial displacements, such as: Acquisition for scenic easements or historic sites for the purpose of preserving the site.”

5. The new TRPA Environmental Checklist (Attachment G) has a far-reaching significant environmental impact on the TRPA project environmental review and decision-making process regarding all projects within the Lake Tahoe Basin. As such, the new Environmental Checklist must be considered by the Advisory Planning Commission in an open public hearing before use. A search of the TRPA website did not reveal that such a Public Hearing has been undertaken.

As currently written, the new Environmental Checklist continues to violate the Bi-State Compact by practicing arbitrary and capricious decision-making void of adequate cumulative impact analysis. This is prejudicial abuse of decision-making by failing to provide an adequate and substantial Environmental Impact Statements analysis identifying and analyzing the true cumulative impacts and effects of all incremental code changes and projects within the Lake Tahoe Basin.

The new and previous TRPA Environmental Checklists circumvent the process of ensuring that **cumulative impacts** are analyzed. Cumulative impacts result from individually minor but collectively significant actions taking place over a period of time.

6. Additionally the following Staff Report Items are flawed as discussed below:

- **Required Findings Item 3.** Stating that: *The project will have indirect benefits to both Air Quality and Water Quality* is subjective, vague, opinionated, arbitrary, and capricious.
- **From Staff reports:** *The service has been operating for a number of years on a less-formalized basis* is an obfuscation—vague and incomplete—since the past use of the property was that of a 10-year inactive school campus with 8 years of non-permitted TTD parking and a non-permitted bus TTD transit stop. “Less-formalized” in this case means, “unpermitted.”

Significantly, the TRPA acknowledges that TTD has used the property for eight years without a Special Use Permit, which was required in accordance with Chapter 2, Subsection 2.2.2.a of the TRPA Code.

- **From Staff Analyses Page 3 F. 3 Traffic:** The statement by TRPA Staff that, If the provisions of the Mobility Mitigation Program were applicable, this project would not be subject to any additional mitigation requirements G. is a prejudicial abuse of discretion to avoid any future Environmental Reviews concerning traffic should additional Environmental Reviews be required.

Attachments:

[Attach 1AA -TTD Intercept Parking SUP Application 5-11-21](#)

Attach AA May 26 2022 Meeting Transcription

[Attach AAA TTD Permit Acknowledgement](#)

[Attach B May 26 Mtg Staff Rpt](#)

[Attach C Dec 16 2021 Agenda](#)

[Attach D Dec 2021 Staff Report-Same as Nov 18 Staff Rpt](#)

[Attach E Nov 18 2021 Agenda](#)

[Attach F Nov 18 2021 Mtg Staff Rpt](#)

[Attach G May 20 2022 New TRPA Enviro Checklist TRPA IEC](#)

[Attach H Env Checklist for Nov 18 and Dec 16 Meetings](#)

[Attach I TTD VMT Analysis Memo](#)

[Attach J - 2021 NDOT Capital Assistance Addendum-TTD](#)

Attach J1 7-29-20 FTA to NDOT Concurrence on CE Determination

Attach K FTA CE Determination for 771 Southwood Boulevard Incline Village NV

Transcription of May 26, 2022 Hearing Officer Action in connection with the ESE permit approval. ERSP2021-0673. Also includes NEPA discussion with Counsel.

i.e. Time mark beginning at 01:08:33 and ending at 01:12:10 (Link attached / Audio file at bottom of page).

<https://www.trpa.gov/hearings-officer-meeting-documents-may-26-2022-online-meeting/>

Andrew (Hearing Officer)

My last question and clarification—I think—is probably for our counsel, Marsha. Mr. Flaherty mentioned the joint environmental documentation and coordination process between TRPA and NEPA. Marsha, can you shed any light on how that might be applied in this instance?

Yes, I can Andrew. The Initial Environmental Checklist for this project didn't reveal any need for additional environmental review. And TRPA is the only agency that is approving this permit. Other agencies may have approved transportation plans or other things that are being implemented, and this particular stop is part of that. But this project approval just involves TRPA for this permit. So when we have a situation where we have other Federal, State, local agencies that also have an approval that will be required for the project, then we do coordinate the environmental review. Usually includes a more extensive document—an EIR or EIS—and that's something we do on a regular basis. But in this case Section 6.2 just wasn't triggered because we don't have a joint agency approval process going on.

Andrew – Very good, thank you Marsha. There may have been some previous NEPA action taken between NEPA and TTD and the Federal Highways for some other part of their work, but not in this situation.

Marsha – Correct. I hesitate to speak to that because I do not know what other approval processes were. But for this permit, TRPA is the approving agency.

Andrew – I agree with you, thank you, Marsha. Given that, I will now take action on the project based on the information that's contained in our Staff Report including the findings of fact and the rational on which they're based—and that includes Chapter 4, Chapter 21—Special Use Findings, Chapter 50 – the Special Public Utility Findings, and the FONSE or Finding of No significant Environmental Effect, I will approve the findings, as they have been proposed; and secondly, I will approve the Temporary Use Permit, subject to the draft conditions that are contained in it to permit the activity, the temporary activity for a 6-month period with the option under certain conditions to extend that for one more 6-month period. Thank you. And thank you everyone for your thoughtful input.

Bridget

I'm sorry. Again we talked a at the start of the hearing about the revision to the terms and conditions of the permit. I don't know if when you approve the project you need to get that specific about that condition.

Andrew

Let me do that. Thank you, Bridget. Yes, for the draft conditions, in the Permit draft conditions, the timing element—and that is condition number 5 [Bridget, yeah, Special Condition 5] Special Condition 5 has a timing element for when the Transit Operations report on the service is due to the TRPA within 30 days of the final day of service. Thank you, Bridget. Yes, we do want to include that.

Bridget – Thank you.

Andrew

And that is part of the Conditions of the Draft Permit. At this point I will hand over the duties of Hearings Officer to Paul Neilson for Item 5.c



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IX
Arizona, California,
Hawaii, Nevada, Guam
American Samoa,
Northern Mariana Islands

90 7th Street
Suite 15-300
San Francisco, CA 94103-6701
415-734-9490

888 South Figueroa Street
Suite 440
Los Angeles, CA 90017-5467
213-202-3950

July 29, 2020

Mr. Graham Dollarhide
Multimodal Planning
Nevada Department of Transportation
1263 S. Stewart Street
Carson City, Nevada 89712

Re: Categorical Exclusion Concurrence for
Real Property Protective Acquisition
Claim

Dear Mr. Dollarhide:

The Federal Transit Administration (FTA) has completed our review of your June 26, 2020 letter and supporting documentation requesting an environmental determination for a protective acquisition of the real property located at 771 Southwood Boulevard, Incline Village, Nevada (Property). Based on the information presented in your letter and the documentation you submitted, FTA has determined that the project qualifies as a categorical exclusion under 23 CFR Part 771.118(c)(6), Acquisition or Transfer of the Interest in Real Property:

“Acquisition or transfer of an interest in real property that is not within or adjacent to recognized environmentally sensitive areas (e.g., wetlands, non-urban parks, wildlife management areas) and does not result in a substantial change in the functional use of the property or in substantial displacements.”

For the last nine years, Tahoe Transportation District has been using the Property for a seasonal transportation hub. The Property is an old elementary school owned by the Washoe County School District (WCSD). On August 13, 2019, the WCSD adopted a resolution of intent to sell the property. Upon acquisition, the transit use of the property will remain consistent with the current use.

This review finds that the project: is not within or adjacent to recognized environmentally sensitive areas; does not result in a substantial change in the functional use of the property; or result in substantial displacements.

Please be advised that acquiring property pursuant to this categorical exclusion must not limit the evaluation of alternatives when the future FTA-assisted project is evaluated in the FTA environmental review process, which must allow for the possibility that the property will not be used for the project. Furthermore, acquiring the property must also comply with the Uniform Relocation Act requirements.

If you have any questions about this determination, please contact Ms. Jean Mazur, Transportation Program Specialist, at (415) 734-9456, or by email at jean.mazur@dot.gov.

Sincerely,

**RAYMOND S
TELLIS**

Ray Tellis
Regional Administrator

 Digitally signed by RAYMOND S
TELLIS
Date: 2020.07.29 17:09:23 -07'00'

ATTACHMENT K



Doug Flaherty <tahoebblue365@gmail.com>

FTA CE Determination for 771 Southwood Boulevard Incline Village NV

1 message

Matley, Ted (FTA) <Ted.Matley@dot.gov>
To: "tahoebblue365@gmail.com" <tahoebblue365@gmail.com>

Mon, Jun 7, 2021 at 8:05 AM

Mr. Flaherty,

We also received the attached letter from Tahoe Transportation District (TTD) addressed to you that discusses the Stream Environment Zone (SEZ) issue.

The Categorical Exclusion (CE) determination that FTA Region IX issued allows the project sponsor to purchase the property using federal funds, should the project sponsor choose to do so. The FTA CE determination does not include approval for any future changes to or development of the property.

If the property is purchased using federal funds, or should federal funds be proposed to fund the development of or change the use of the property, an additional review and determination under the National Environmental Policy Act (NEPA) is required to develop or change the use of the property. We have confirmed with the project sponsor that they understand the limitations of the current FTA CE determination and that any future action to develop the property or change the use will require additional NEPA analysis.

The analysis would examine a full range of environmental impacts including the issues you have raised. I am hopeful that this future review, should it become necessary due to a proposed development of or change of use for the property, will meet the expectations of yourself and the other citizens of the area.

Thank you for the information you have provided, which will inform any future analysis. Should you have any further questions regarding the NEPA process, please let me know.

Ted Matley
Director of Planning and Program Development
FTA Region IX
90 Seventh Street, Suite 15-300
San Francisco CA 94103
(415) 734-9468
ted.matley@dot.gov

Letter - Doug Flaherty - 28MAY21.pdf
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