

# **Public Comment Supporting Document**

## **TRPA Governing Board Meeting August 26, 2020**

### **Topic: Washoe County Tahoe Area Air Quality Monitoring**

*From Carole Black, MD*

*As you know I am a retired physician and Incline Village resident. I am concerned about the lack of comprehensive air quality monitoring in WC's Tahoe Area. I have become very acutely aware when searching for air quality (AQI) info in regard to smoke alerts. Poor air quality is a health risk increased in certain groups including older individuals, children, pregnant women and those with cardio-respiratory conditions.*

#### **ARE THERE HEALTH ISSUES?**

Per EPA: "The biggest health threat from smoke is from fine particles. ... They can cause a range of health problems, from [mild] to aggravated chronic heart and lung diseases. Exposure to particle pollution is even linked to premature death"\*

"Particles from smoke tend to be very small ... within the fine particle PM2.5 fraction and can be inhaled into the deepest recesses of the lung ... Particulate matter may also affect the body's physiological mechanisms that remove inhaled foreign materials from the lungs..." \*\*

Per CDC: "Exposure to air pollutants in wildfire smoke can... increase susceptibility to respiratory infections, likely including COVID-19. ... Recent scientific publications ... suggest that air pollutant exposure worsens COVID-19 symptoms and outcomes." \*\*\*

#### **WHAT ARE INTERVENTIONS?**

The main intervention is minimizing or avoiding smoke exposure & recommended intervention intensity increases with higher levels. Smoke collects near & downwind from fires; mountain valleys may experience smoke collection > TAHOE!

#### **WHAT ARE PM2.5 LEVELS IN WC'S TAHOE AREA?**

**WE DON'T KNOW** – Per WCHD there are NO permanent, EPA certified PM2.5 sensors in WC's Tahoe Area. There is an appropriate PM2.5 sensor in Tahoe City but I found no validation of whether those levels match Incline Village and some suggestion in comparing available "low cost sensor info" shown on the AirNow.gov site that there may be a significant difference.

**RECOMMENDATION:** To determine appropriate interventions for Public Safety, accurate local AQI metrics (PM2.5, Ozone & ?PM 10) are needed. A permanent sensor would optimally be located in WC Tahoe area. Or, ad hoc IV measures should be obtained & compared with Tahoe City results to confirm applicability.

In addition, from a TRPA threshold reporting perspective, there is apparently no PM 2.5 sensor on the entire NV side of the lake. In fact, looking at the AirNow site today, there is around Lake Tahoe only one each of PM 2.5, PM 10 and Ozone sensors – PM 2.5 in Tahoe City, PM 10 in South Lake Tahoe and Ozone in Incline Village. How are accurate threshold metrics possibly obtained to reflect the actual local situations around the lake?

Thank you.

References: \*<https://www.epa.gov/pm-pollution/how-smoke-fires-can-affect-your-health>;

\*\*[https://www3.epa.gov/airnow/wildfire\\_may2016.pdf](https://www3.epa.gov/airnow/wildfire_may2016.pdf); \*\*\*<https://www.cdc.gov/coronavirus/2019-ncov/php/smoke-faq.html>

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**TRPA Governing Board Meeting August 26, 2020**  
**Topic: Trash, Tourism and Tahoe Area Occupancy**

Submitted by Carole Black, IV Resident

The following comments were stimulated by a forwarded email (which originated from a TRPA rep) that I received on 8/13/2020 with the logo “Let’s Talk About Trash and Tourism ...” which described efforts to manage trash around Tahoe

A similar article appeared in the Reno Gazette Journal (8/14/2020) titled “Frustrated Lake Tahoe Residents Plan to Protest Disrespectful Behavior by Tourists.” Commentary focused on challenges & interventions. Specifically there were several interesting observations:

- “The Tahoe Daily Tribune reported mobs of tourists are crowding beaches, trails and roads, not wearing masks and leaving piles of garbage behind.”
- “... CEO NLT Resort Assoc. said people are pouring into the Lake Tahoe area because many destinations in California are closed ... Even national parks only allow 30 percent of traffic ... no easy way to limit the number of tourists pouring into Lake Tahoe ”
- “Can’t keep tourists out, but looking to find a solution ...” (SLT rep)

**Thus we conclude: more tourists at Tahoe leaving unwanted footprints - trash; parking/traffic scrambles, some fires (IV); crowding & social distance/masks failures while likely bringing/spreading virus. And there are known historic challenges re first responder staffing/evacuation capacity. Yet Area Occupancy, a root cause, is not addressed.**

**Of interest, with IV’s STR rapid increase, average area occupancy has increased substantially particularly during busy seasons:**

**IV Added Area Occupancy over the several years ending in 2018** included approximately 750-1500 more people/day\*; 200-600 more vehicles/day\*\*; 200-1200 more vehicle trips/day^ & 116 added beach visits/day in season (94% increase in July/August^^)

**Summer 2019** added a further MASSIVE STR Occupancy Increase: 27,000 more Airbnb arrivals & 23% added RSCVA Vacation Rental Days. **Summer 2020** data is pending, though it has clearly been an aberrant year with remarkable interest in beach availability despite or perhaps because of the pandemic

**So, in addition to robust, comprehensive parking, traffic, trash, safety, etc. planning which is essential given current conditions observed in Incline Village and likely elsewhere around the lake, shouldn’t we be addressing total area occupancy vs. infrastructure capability and safe area capacity in developing tourism approaches?**

Given the linkages:

STR growth > Added Area Occupancy > Added Trash/Parking/Traffic/Crowding/Health & Safety risk, shouldn’t STR regulation be reviewed/re-emphasized with appropriate density/intensity/nuisance and health & safety requirements?

*Note: Estimates from RSCVA & Census data, IVGID surveys/reports, WC staff; Airbnb press release; \* 2018 vs 2014; \*\* avg. 2.5 occupants/vehicle winter; 4/vehicle summer; ^ assumes 2 trips/vehicle/day; ^^ 2019 vs 2016*

Keiron McCammon  
Agenda Item No. VI.A  
Tahoe Keys Lagoons Aquatic Weed Control Methods Test

The AIS, primarily weeds, infesting the Tahoe Keys lagoons has got beyond the point where a bunch of homeowners, alone, can be expected to tackle a problem that now threatens our lake. It is time for joint action by the State, Regulatory Agencies, Environmental Groups and homeowners to combat this problem.

Despite what some within our community may choose to believe, homeowners in the Keys are not personally responsible for these weeds. Unfortunately, like other shallow/warmer areas around our lake, the Keys lagoons are simply more susceptible to an infestation that we have seen lake wide.

We need help to combat this problem!

Hoping the Keys lagoons go away one day is just sticking our heads in the sand. Like it or not, the Keys have been here for fifty years and are going to be here for the next fifty.

In my humble opinion, not testing herbicides is environmentally irresponsible given the size of the infestation in our 170+ acres of lagoons. To date, our own, non-herbicide, measures to harvest/control the weeds over the decades have done nothing to curtail the spread - in fact things have only gotten progressively worse.

We need to test all alternatives side-by-side, including herbicides, to see if anything will work at this scale. Not testing herbicides and hoping that an, as yet, unproven method will work at such scale should not be the preferred environmental alternative.

I believe in hoping for the best, but planning for the worst.

It would be fabulous if one of the non-herbicide test methods proves effective at scale, but if it doesn't we better have a backup plan or risk not being able to tackle this problem for another 5+ years!

I'd hate to see the kind of degradation we, as homeowners, have witnessed in our lagoons over the years, despite our best efforts, happen to other areas of our lake. People no longer swim in our waters, the weeds are a constant nuisance getting caught in paddle board/kayak paddles and around boats & docks. The turbidity of our water is simply awful compared to the clarity of the lake.

I implore the Governing Board to, at the very least, approve the proposed limited testing of herbicides within the Keys lagoons so that three years from now we can debate the real-world, scientific evidence regarding their efficacy and environmental impact compared to non-herbicide alternatives.

If you do not, I fear the problem will only get worse with each passing year, with no end in sight.

Warmest regards  
- Keiron McCammon

<https://www.trpa.org/wp-content/uploads/RPIC-Agenda-Item-No.-2-Draft-Placer-County-TBAP-Amendments-Staff-Report.pdf>

**I find this series of meetings and requests for input from TRPA highly irregular and somewhat backwards. Placer County should be conducting, at the very least, Area Plan Team meetings and workshops to vet this information. And, of course, North Tahoe Regional Advisory Council meeting for input before going to the Planning Commission and Board of Supervisors.**

**NO APPROVALS should be suggested before the COMMUNITY is allowed to have their rightful input.**

**Cleaning up the Area Plan through this type of change fix “Senior Housing” isn’t very transparent. Also trying to clean up RHNA requirements in one big amendment is disingenuous and the overall intent of how the amendment process should be conducted seems broken.**

**NO AMENDMENTS should be approved until the community weighs-in on location specific sites and each Area Plan Team has an opportunity to review.**

I’d like to know from Placer County and RPIC member for Placer County Ms. Gustafson what is Placer County’s procedure for Tahoe Basin Area Plan amendments and where can I find that in Placer County code?

Amendments should follow the same process as the initial planning process as stated in TRPA code

**Area Plans shall be prepared in coordination with local residents, stakeholders, public agencies with jurisdictional authority within the proposed Area Plan boundaries, and TRPA staff.**

TPRA CODE below

**13.6.2. Initial Approval of Area Plan by Lead Agency A. When TRPA is Not the Lead Agency** If the lead agency is not TRPA, then the Area Plan shall be approved by the lead agency prior to TRPA’s review of the Area Plan for conformance with the Regional Plan under this section. **“In reviewing and approving an Area Plan, the lead agency shall follow its own review procedures for plan amendments.” At a minimum, Area Plans shall be prepared in coordination with local residents, stakeholders, public agencies with jurisdictional authority within the proposed Area Plan boundaries, and TRPA staff.**

Summary and Staff Recommendation: TRPA and Placer County Staff will provide an overview of proposed amendments to the Placer County Tahoe Basin Area Plan (TBAP). This item is for informational purposes and no action is required. **Staff requests comments from the Regional Plan Implementation Committee before Placer County begins the process of approving these changes through the Placer County Planning Commission and Board of Supervisors.**

Required Motions: No motion is required.

Project Description/Background: On May 22, 2019, Placer County staff gave an informational presentation to RPIC to discuss potential housing-related amendments to the TBAP. **The amendments would have updated the TBAP for consistency with new TRPA Development Rights Strategic Initiative; allow multi-person housing development in mixed-use and community service districts; update Accessory Dwelling Unit (ADU) provisions for consistency with new State of California regulations and new TRPA code allowing for achievable housing; and delete the “Senior Citizen Only” special designation for the Dollar Hill Mixed-Use Neighborhood zoning subdistrict. Since the May informational session, Placer County has incorporated additional refinements into the amendments to update policy, development standards, and process related to Area Plan residential land uses and affordable housing. The current proposed draft Area Plan amendments are generally consistent with the**

information presented at the May 2019 RPIC meeting, while incorporating RPIC feedback and new refinements which have arisen since the May presentation.

The new amendments, which are in addition to those presented at the May 2019 RPIC meeting, focus on expanding the allowance of different types of multi-residential land uses in all residential, mixed-use, and community service subdistricts where some form of multi-residential land use is already allowed, as well as adding multi-residential land uses into the Kings Beach Industrial District (which is a community service district).

The amendments are aimed at accelerating the production and supply of affordable-achievable housing for those who live and work in the North Tahoe-Placer County region and are part of a comprehensive effort to meet State of California mandates for affordable housing specified in the Regional Housing Needs Assessment (RHNA) and Sustainable Communities Strategy requirements, as well as meet the REGIONAL PLAN IMPLEMENTATION COMMITTEE AGENDA ITEM NO. 2

Regional Plan goals of sufficient workforce housing in compact, walkable town centers in order to meet TRPA threshold standards. Additional detail about these amendments is included in the attached Placer County memo (Attachment A) and the TBAP Implementing Regulations with track changes shown (Attachment B). Based on RPIC's direction, **Placer County will continue moving the proposed amendments through the Placer County approval process and, once completed, will bring a full amendment package forward for future consideration by the TRPA Advisory Planning Commission and Governing Board in November and December of 2020.**

**I completely understand that NO MOTION IS REQUIRED for this item but the TRPA needs to step back, advise Placer to go back to the community before bringing this type of information for advancement. Where is the community in community Planning ????**

Neighbor of the Hekmat-Whitehead pier project.

**From:** Jeff Lager  
**Sent:** Monday, August 24, 2020 9:41 AM  
**To:** [abby@tahoelandplanning.com](mailto:abby@tahoelandplanning.com)  
**Cc:** 'Lager Family'  
**Subject:** Whitehead/Hekmat pier project ERSP2020-0121

I am writing to express my support for the above-referenced pier project.

I have reviewed the proposed plans and have no objections.

Thank you,

Jeffrey T. Lager  
JSN Legacy, LLC  
891 Lakeshore Blvd