

From: [Alli Berry](#)
To: [Marja Ambler](#)
Subject: North Lake Tahoe
Date: Wednesday, April 26, 2023 8:16:31 AM

Please pass this on to the Governing Board today. Thank you.

In your meeting today, please ask yourselves, "Where is the traffic plan for North Lake Tahoe? What happens to the residents and visitors in the event of an emergency? Can people get out in a timely manner?" Please ask yourselves what the acceptable number of deaths is while people are stuck in traffic, unable to flee. Please ask yourself if you have ever experienced an hour drive from Kings Beach to Truckee in normal traffic. I have, often. Have you seen the lines in Kings Beach Safeway that extend to the back of the store? Again, I have, often. The North Shore is not equipped to safely handle more. You are pricing locals out of the the housing and even rental market. You are creating unsafe living conditions. You are ruining this place. It is not too late to change. Please, please consider more than money when you make your decisions. Thank you.

Alli Berry
Kings Beach, CA

From: [D. Kanare](#)
To: [Marja Ambler](#)
Subject: I oppose new big developments in Crystal Bay and around Tahoe
Date: Wednesday, April 26, 2023 7:45:35 AM

Dear Marja,

As a real estate broker and long time resident of Incline Village I am adamantly opposed to the proposed projects that are on the TRPA agenda for the meeting on Thursday. There is no legitimate reason to move forward with the Boulder Bay concept or any variation thereof.

The role of the TRPA is to protect the fragile Lake Tahoe environment. It's not to be involved with economic issues or to be supporting development that is only going to bring more people to the basin.

Have you ever been to Crater Lake? The reason it stays so clear and pristine is because of the lack of development.

Let's be honest, by any metric the TRPA is an abysmal failure and is derelict in their mission to preserve and protect the environment. Lake clarity has declined precipitously while big money interests continue to falsely tout the notion that new developments will be good for the basin.

The only reason lake clarity improved last year was because there was so little run off and so little snow (which means less grit and sand being put on the roads). I promise you that lake clarity will once again be under 60 feet when the measurements are taken this coming summer.

Please do the right thing and get the Board of Governors to stop this nonsensical idea that more development is good for the Tahoe environment.

As a real estate broker I would make more money if more people come to Tahoe and buy new condos, houses, commercial buildings, etc. But, I don't need to make more money if the net result is that these new projects are going to ultimately do harm to the environment.

Thank you for your consideration of all of the above and I hope you and the TRPA executives and the TRPA Board of Governors will stop pursuing these absurd projects that will do more harm than good.

Sincerely yours,

Don Kanare

From: [gailm822](#)
To: [Marja Ambler](#)
Subject: [BULK] Tahoe expansion
Date: Wednesday, April 26, 2023 6:09:11 AM

Hello. I am a resident of Incline Village and I wanted to make my feelings known to you as part of TRPA. I'm against any high-density housing that increases the congestion and traffic in Incline Village. Although I understand tourism is vital for the Tahoe Basin to survive, I'm unwilling to see the character of North Lake Tahoe destroyed by over building. Please use restraint when you approve further building and remember that the residents in Tahoe are the backbone of neighborhoods, not tourists and STRS! I have no desire to see beautiful Incline Village turn into a South Lake Tahoe experience!

Respectfully,
Gail Marshall
Incline Village

Sent from my Verizon, Samsung Galaxy smartphone

From: [Revitalize Tahoe Biltmore](#)
To: [John Hester](#); [Julie Regan](#); [Paul Nielsen](#); [Marja Ambler](#)
Subject: Letter of Support for the Waldorf Astoria Project
Date: Wednesday, April 26, 2023 8:06:40 AM

First Name: Heidi

Last Name: Drum

Email: heidi@tahoeprospersity.org

City of Residence: Kings Beach

Message: The status quo isn't working. This rundown and dated property is in dire need of redevelopment. We haven't had any significant community redevelopment projects on the North Shore in many years. It is time for redevelopment that improves old properties and adds workforce housing. Is any project perfect? Obviously, no. But this proposal has more positive, environmental and community benefits than the current property. On a personal note, I live near this project and will drive by it each day I go to work so I will feel the impacts directly as it is being constructed and I support this redevelopment project.

Date: April 26, 2023

Time: 8:06 am

From: [JUDY CRUM](#)
To: [Marja Ambler](#)
Subject: Just say no to this huge hotel!!! Bigger is not better!!!
Date: Wednesday, April 26, 2023 7:32:58 AM

WALT/Boulder Bay Project

TRPA decided that the way to enforce completion of water quality improvements (BMPs) by commercial owners was to incentivize large development projects with extra height, density and coverage. CEPP didn't work. It's 12 years later and the Boulder Bay water quality improvements are still unfinished. Water has been running off the site for years. The site is a dilapidated eyesore with holes in the roof windows and missing doors. The previous owner built 18 multimillion dollar condominiums and then sold the entire site to EKN development. The original plan was approved by Governing Board in 2011. At that hearing two members of Governing Board voted against approval. TRPA should never have approved the project since it went from the existing build out of 120,000 square feet to the proposal of as much as 800,000 square feet, yet the original developer claimed the new project would reduce traffic based on a faulty 2006 traffic baseline.

For years the actual baseline traffic of the site has been nil. The project's own traffic study states the project will create 2880 vehicle trips each day. Although repeatedly asked, EKN has refused to disclose the population of the revised project.

The project owners have tried to eliminate the 4th access out of upper Crystal Bay numerous times. The community has spent thousands to maintain the 4th exit.

Now the WALT project has substantially changed. It's still the same basic build out (800k sf), just less units. The units are larger and building up to 2' higher. Some units are over 5k sf. The access to the site has significantly changed with a drop off point on upper lakeview and the elimination of access on SR 28 and exit on Stateline Rd. Representatives of our group have had numerous meetings with EKN and the County with no agreement on cut through issues for the residential neighborhood of upper Crystal Bay.

Where is the basin wide evacuation plan that covers the millions of visitors and locals when the next wildfire or other emergency occurs? Where is the cumulative impact of the numerous (12 large) projects approved or under review. Cal-Neva, Tahoe Inn, 39 Degrees, Ferrari/Laulima, Martis Valley West, Neptune Investments, Alpine View Estates, Boatworks

Redevelopment, Tahoe City Lodge, Homewood, and Palisades?

[Sent from AT&T Yahoo Mail for iPhone](#)

April 26, 2023

RE: Public Comment - Agenda Item VII.A. Waldorf Astoria Lake Tahoe Project,
TRPA File No.CEPP2014-0138-01

Dear TRPA Governing Board,

****Please make the following public comments part of the minutes and the record****

My family has lived at Lake Tahoe for nearly 100 years.

Lake Tahoe's fabled reputation as the "Jewel of the Sierra" is at risk. Recent scientific studies show that the unparalleled beauty of its waters and geologic watershed basin environment are in peril due to human over-crowding and over-use, increased pollution including micro-plastics, dead or dying vegetation, wildfire dangers, airborne particulates and toxic gases, toxic algae blooms, and invasive plant and aquatic species.

It is clear that the **proposed revised plans for a mega casino-hotel development by Waldorf Astoria-Lake Tahoe (WALT) on this site does not provide proper accountability for protecting Lake Tahoe's waters and watershed basin environment under ALL of the conditions that presently exist.** The developer's traffic and public safety data appear to be flawed. Changes have been made from original permits dating over a decade ago that significantly increase the overall size and scale of the project. And a current Environmental Impact Study of all development impacts upon wildlife, shore zone, aquatic invasive species, air and water quality, for example, is absent.

Over the years, the negative cumulative impacts of Tahoe basin-wide developments, including paving roads and parking lots, growing tourism and tourist attractions, heavy roadway traffic, and increasing fires - when combined together, project by project, impact by impact, county by county, year after year - add up to an abundance of detrimental effects upon the Lake Tahoe basin waters and watershed environment.

Please consider some of these negative cumulative impacts:

- Increasing building height and density have an impact on the number of additional people that will occupy a given footprint. This increased population will then require more service workers to maintain the large, densified buildings they occupy, and increases the need for more service workers for food, supplies, medical, waste management, effluent pipeline infrastructure, school infrastructure and personnel. These additional people by their very presence on the land and water will be impacting the lake basin environment 365-days per year and require transportation on and about our already congested roadways.
- Machinery excavating excessive tonnages of soil and tree removal have an impact on the surrounding slopes, flora, and wildlife.
- Trucks going in and out of the basin servicing the project site - during excavation, construction and after project completion - have an impact on basin road conditions, transportation congestion, air and water quality, and public safety, especially during emergency evacuation scenarios.
- Adding hotel-casino-commercial-residential uses bringing visitor, employee, vendor and service vehicle traffic to already congested and limited roadways has a negative impact on roadway efficiencies, roadside erosion, air quality emissions and particulates, water quality drainage and runoff conditions and **imposes additional risk to already dangerous conditions for public safety, especially in the event of wildfire evacuations.**

In order to fulfill its role as an environmental steward for Lake Tahoe, the TRPA has no other option but to withhold approvals for any development projects in the Tahoe basin pending completion of required updated/new Environmental Impact Studies (EIS) for each and every residential housing, commercial, hotel, casino, transportation, recreation project within our environmentally sensitive Lake Tahoe watershed basin.

Without proper **accountability for cumulative impacts** through analysis of **real time data and current conditions in relation to Lake Tahoe's maximum "Carrying Capacity,"** and utilizing essential information provided within a **full Environmental Impact Study report...**it would be impossible for any board member to cast a vote for or against any project that will impact the Tahoe basin for a lifetime, and beyond.

Be aware: **A simplified desktop environmental "checklist" review (in lieu of a complete EIS) does not provide sufficient detailed reporting** of all necessary information on which to base a monumental decision to impose additional development pressures on Tahoe's environment.

Further, it is **an ill-conceived notion that more and more development is the way forward to improving Tahoe's environment.** The facts speak otherwise: how can one ever justify creating overwhelming negative impacts to Tahoe's fragile environment and infrastructure by supporting large scale, mega developments that displaces 1,000's of pounds of soils along with trees and wildlife and also adds higher densities of more and more people to a smaller footprint who will occupy Tahoe's land and water, impacting infrastructure and increasing the need for more and more workers in the area plus transportation 365-days per year... that are supposedly balanced by the positive outcomes of completing water runoff drains and BMP retaining walls for erosion control? It is illogical that more and more development will improve Tahoe's environment...and simply nonsense.

No TRPA board member could possibly vote with confidence or competence to approve massive hotel-casino development towers that are inconsistent with our small, rural mountain community character, within a limited geographic basin that lacks sufficient infrastructure to handle them....**without first reviewing a complete Environmental Impact Study for each and every proposed new/changed project with analysis of real-time data for Tahoe's overall "Carrying Capacity" and careful evaluation of negative "Cumulative Impacts from aggregated development - past and present, over time."**

Any such action could be construed as a dereliction of the TRPA board member's responsibility to protect public safety and do no harm to our treasured lake environment.

There is no need for making a hasty decision on the pending WALT mega-project approval.

Please step back and take time...to allow for thorough real-time Environmental Impact Study (EIS) on this project, in order to properly account for Tahoe's current "Carrying Capacity" and all potential negative cumulative impacts it will cause in the Lake Tahoe basin, over time. **You must in good conscience vote "no" on the Waldorf Astoria Lake Tahoe project at this time.**

Thank you for taking the appropriate and necessary action: Please vote "no" to this massive development plan, and say "yes" to protecting Lake Tahoe's environment for future generations.

Sincerely,

Kristine Mitchell
Incline Village Resident

From: [Mary Mosher-Armstrong](#)
To: [Marja Ambler](#)
Subject: [BULK] WALT/Boulder Bay Project
Date: Wednesday, April 26, 2023 7:30:33 AM

Hello Marja,

Please disseminate this to the governing board.

I hope the WALT/Boulder Bay Project will not be approved **without** verifying once and for all, the existence of a *full public access* replacement road out of upper Crystal Bay in lieu of Reservoir Road. The road to replace the 4th exit out of upper Crystal Bay has had many names, originally Wellness Way (when the project was going to have a health spa theme a decade ago) and I believe is now being referred to as Scenic Dr. However, there seems to be intentional murkiness as to whether, after multiple plan revisions, this will be a private road, emergency only road or a road available to residents.

Currently, Reservoir Road is THE safest exit out of upper Crystal Bay, especially in the Winter, but really any time of the year because both Amagosa and Beowawie have blind approaches from at least one direction on Hwy 28, and their non-conforming slope grades are better suited to recreational sledding hills than safe access onto Hwy 28. One (of many) stellar examples is a pickup truck that slid off the road going down Amagosa on December 1st/2nd. The sheriff was called and when they responded the sheriff vehicle slid into the distressed vehicle! Another sheriff's vehicle was summoned and it too slid off the road!

Reservoir Road has the least grade slope and the most visual acuity of any outlet from upper Crystal Bay and there **must** to be a safe replacement for it, not only for emergency evacuation from the neighborhood, but just for the general ingress and egress to upper Crystal Bay in the safest manner possible.

Below is a copy of the letter we sent to the Washoe County Commissioners on May 28, 2021. Everything remains unchanged except that Item 7, where this area was being used as the Crystal Bay satellite transfer station, was removed last fall so a huge hole could be dug that is now filled with water and should make an excellent mosquito breeding ground (photos below).

"Dear Commissioners, et. al,

As full time residents of Crystal Bay, we have the following concerns on the "quit claim" request of the Boulder Bay project to be read into the public comments.

We are concerned about the abandonment of Reservoir Road for a plethora of reasons including but not limited to:

1. Abandoning Reservoir Road completely eliminates an access & escape route for the residents of Crystal Bay during an emergency evacuation for fire, avalanche, etc., which should be of critical importance to everyone, especially in light of the last few fire seasons. (T.7.3. Disaster Preparedness, Tahoe Master Plan)
2. Reservoir Road gives neighboring residents direct access (both on foot and vehicular) to the Crystal Bay Post Office, unlike the proposed alternative which would now have us all going via the Horn of California to get there. It vaguely says in various places of the proposal "...pedestrian access

will be handled privately..." and "...sidewalks may be located..." That all seems really vague and like something that should be nailed down by now if you are asking someone to give away the farm. If there is a proposed pedestrian alternative to Reservoir Road through the private property for public use, we're not seeing it. (And don't say the existing public "park", as our 82 year old neighbor who walks to get her mail on Reservoir Road every day isn't going to make it up the dirt hill and the stairs to nowhere...especially in the Winter!)

3. The replacement is not within current code standards (12+%) and so is not an "improvement" to the neighborhood. There are certainly other ways and waypoints to make it a kinder & gentler slope, however, as stated in the packet, it is not in the developer's best interest, as that route would have to go through one of the tower/pods and come out near the existing construction office building. There are ways to meet current code.

4. It is laughable to say that the actual Crystal Bay neighborhood is benefitting from this road abandonment and land giveaway. The development is solely benefitting from this. Those of us outside the development footprint are still driving on our single lane roads with no street parking whatsoever...and we don't have a problem with that! But to say it benefits those of us outside the minute development is wholly inaccurate.

5. Who is maintaining Stateline Road, with its now extensively increased proposed use? Presumably California, since most of it is in CA? So we (NV) are going to eliminate a Nevada access/egress point for its residents (Reservoir Road) that we have control over (paving) and keep clear in the Winter and hope & pray that CA does as good a job with the Stateline? NDOT is the best!

6. Neighbors that have boats, trailers, etc. use Reservoir Road when towing because it is difficult/impossible to make the 90 degree or more corners on Beowawie or E. Tuscarora when you are towing into the neighborhood. Yes, they could use the proposed alternate of Stateline road, however, as was brought up at the IV/CB CAB meeting, that will make criminals out of those with Concealed Carry Weapons (CCW) permits, as this now forces everyone towing to drive into California to get to their Nevada residence...and CCW is not allowed in CA. While this may seem minor to some people, there are more than a few of us in the neighborhood that would be affected.

7. It would be interesting to see unadulterated accident statistics for the intersections at Amagosa, Beowawie & Reservoir Road. If you don't actually live here, you would have no idea that we use Reservoir Road because it's the safest of the three, as the other two both have a blind corner, the speed limit is 35 (a.k.a. 45) and the slopes are easily in the 20%+ range. I know Amagosa has had its share of mash-ups, but the only one I know about at Reservoir is when a TART bus making a left hand turn onto Reservoir off a 0% grade Highway 28, took the corner too tight and clipped the car at a full stop waiting to get on 28! If by some odd chance there are more incidents on Reservoir Road, it's because more of us use it than the other two outlets, as again, it's the safest exit in the neighborhood.

8. Throughout the packet it is stated that this is better for the neighbors and better for the lake. TRPA is brought up a lot and the protection of the lake is mentioned as a priority many times. I feel like if lake quality was really a priority of the developer, this rotting pile of appliances, bedsprings, drywall, etc. etc. that has been behind the contractor's business office for years (and continues to grow) would have been removed so as not to be continually contaminating the lake. It's great to talk the talk, but one should probably also walk the walk if that is an argument being put forth. As

neighbors, we drive or walk by it every day and it makes the entrance of the neighborhood appear to be a satellite transfer station for Waste Management.



Satellite Transfer Station Before...



Mosquito Breeding Ground Project Today...



Just to be clear, we are not opposed to a reasonable development in the Biltmore/Boulder Bay area, but we are definitely opposed to eliminating Reservoir Road which eliminates an emergency ingress/egress to our neighborhood, gives the neighborhood direct access to the CB Post Office and whose proposed alternative would violate code and require residents to leave the State of Nevada to access their Nevada homes.

Mary Mosher-Armstrong

Christopher Armstrong

270 Wassou Rd.

Crystal Bay, NV"

From: [Ron Volle](#)
To: [Marja Ambler](#)
Cc: Stone@washoecounty.gov
Subject: To: TRPA Governing Board re WALT Bolder Bay project
Date: Tuesday, April 25, 2023 9:51:51 PM

Please distribute this email letter to all Governing Board members:

I've been the Real Estate Manger and Development Manger for In-n-Out Burger for over 25 years, now retired. I've met with the EKN developers several times and I am not against the redevelopment of the previous 100,000 sq.ft. Tahoe Biltmore. I live on Tuscarora, close to the project site and I have tried in vain to get the developer to give the neighborhood and nearby home owners a plan to keep the Development's retail project on retail streets and not put our homes and lives in danger. The Developer has been un-responsive since the inception of the project. I've met with everyone who would meet with me including Paul Nielsen at TRPA, no results no action. The traffic study submitted by EKN for the 800,000 sq.ft Waldorf Astoria project is in my estimation so faulty, it's insulting. One 3,500 sq.ft. restaurant can generate close to the PM peak trips then the WALT study reports for the 800,000 sq.ft. project. I've dealt with traffic studies for hundreds of developments.

First question is how many employees on a busy day? That traffic is not accounted for in the VMT as far as I can see and the Developer will not tell me the number.

Using the Trip generation analysis's own words, the WALT plan states the number of UNITS has decreased by 157 (from 374 to 191). One would expect the project size would also decrease but the overall project is bigger, but the Developer continues to say " less dense"! .

With a much smaller hotel the report states: " The WALT provides about TWICE (can we get the correct sq.ft. number ?) as much restaurant floor area as the Biltmore and Boulder Bay programs had. Why would the Developer build a smaller hotel with more than twice the restaurant and bar space? I believe the restaurant, bar/lounge uses within the hotel have been integrated into the " Hotel Accessory space " rate. According to the ITE Hotel use definition: " a hotel is a place of lodging that provides sleeping accommodations and supporting facilities such as a full service restaurant, cocktail lounge, meeting rooms, banquets room and convention facilities" The Developer plans to build 76 hotel rooms in 58,201 sq.ft. of space. As far as I can determine by meeting with the Developer and viewing the plans, they plan to build 25,000 sq. ft. of restaurant and bar space, clearly 1/2 of the entire hotel room sq.ft. for 76 to 100 guests. A SPA of 15,802 sq.ft. (almost 30%) of the entire hotel room sq.ft. and 13,362 sq. ft. of function/banquets rooms.with 28,577 sq.ft. of the plans marked for " circulation"? Plans show a 10,118 sq.ft. lobby/amenity space and a separate building Speakeasy (Bar) of over 7,000 sq.ft. So the accessory space is over 70,000 sq.ft to serve 76 guests? As i understand, all of these spaces/uses are open to the public and are not " supporting facilities to the hotel ".

The definition of accessory space in the 2021 International Building code is: **508.2 Accessory occupancies.**

Accessory occupancies are those occupancies that are ancillary to the main occupancy of the building or portion thereof. Accessory occupancies shall comply with the provisions of Sections 508.2.1 through 508.2.4. Another definition is: " accessory space is incidental and subordinate to the principal use".usually limited to 10% of a project floor area.

Using the PM peak standard ITE rates chart and published table, the PM peak rates are:

Casino 13.5 trips per 1,000 sq.ft, Athletic club is 6.29 per 1,000 sq.ft, Drinking place (Speakeasy & bars) is 11.38 trips per 1,000 sq.ft., Resort hotel is .41 trips multiplied by 76 units, Hair salon is 1.45 per 1,000 sq.ft , Fast Casual restaurant is 14.13 per 1,000 sq.ft., Sit down restaurant is 9.77 per 1,000 sq.ft., Coffee/donuts/bagel is 28-36 per 1,000 sq.ft.. Multiply and add to get the real PM peak generation for the General Urban/Suburban category in the ITE trip generation manual.

I urge you to reject the WALT traffic calculations, and require a realistic traffic study. Please understand

that much like the Incline Village Hyatt, the Waldorf Astoria will be a very popular destination for all of North Lake Tahoe and the resulting and future traffic impacts need to be calculated carefully so that retail streets can absorb the retail traffic generated and prohibit cut-thru neighborhood traffic. The intersection of State Hwy 28 and Stateline intersection needs real traffic and pedestrian controls to work effectively, unlike the Kings Beach roundabouts.

-Ron Volle



Date: April 25, 2023

Governing Board Members
Tahoe Regional Planning Agency
Email: mambler@trpa.gov

Subject: Waldorf Astoria at Lake Tahoe (WALT) – Governing Board Meeting

The Sierra Club Mother Lode Chapter has over 17,400 members in 24 counties in northeastern California. We are the umbrella for over eleven distinct local Sierra Club groups that have countless members and local engagement from Yosemite to the Oregon border. The Sierra Club motto is to explore, enjoy and protect the planet. We are part of the largest and most influential grassroots environmental organization in the United States. The Tahoe Area Group has over 1,000 members in Nevada and California as members of either the Toiyabe Chapter in Nevada or Mother Lode Chapter in California.

The Tahoe Area Group of the Sierra Club offer the following comments on the Waldorf Astoria at lake Tahoe (WALT) that is scheduled to be heard at the April 26, 2023 Governing Board Meeting. In general, we believe the WALT project should not be approved until a cumulative impacts analysis and a full evacuation study are completed. An approval of this project without addressing the cumulative impacts of this project in combination with the numerous other [luxury development projects](#) slated for approval or approved and without addressing the current and future gridlock on the roads and evacuation concerns equates to TRPA failing in its responsibility and duties to protect Lake Tahoe and meet threshold carrying capacities.

Traffic (Transportation and Circulation)

The transportation study states that “At the site access points, the WALT project would result in a net reduction of 537 daily one-way vehicle-trips (or a 13-percent reduction) over the Baseline Biltmore use. (The “Baseline Biltmore” use reflects peak-season Year 2006 operations at the previous Tahoe Biltmore, consistent with the baseline assumptions at the time of the original project approval).” Using 2006 numbers is completely inappropriate as it is not standard practice to use 16-year-old data to analyze traffic impacts. It is only used here to obtain an inaccurate and deceptive conclusion.

It is inconceivable and dubious at best that an increase of 80 units (from 111 to 191) would result in a reduction of vehicle trips. It is also inconceivable that a much larger restaurant that is proposed in the WALT (14,515 KSF – 1,000 square feet – vs. the previous 7.8 KSF) would result

in decreased traffic. Were additional trips by Incline and Kings Beach residents that would be interested in going to a new restaurant calculated into this study?

The latest available (2021) count for Fridays in July at NDOT's permanent station (SR28, 915ft N of Lakeshore Dr/Pinion Dr) is 19,995 trips from [NDOT's Annual Day of Week Summary for 2021](#). This is without any business at the location of this WALT project. The roadway capacity is already exceeded all summer without this project with gridlock and long lines of traffic waiting to get through the roundabouts in Kings Beach.

TRPA's TransCad Travel Demand model assumes all transportation objectives have been fulfilled and that is simply not the case. The transportation study should be more thoroughly vetted and reviewed by transportation experts in Nevada and California. The Tahoe Science Advisory Council is an inadequate organization without the proper credentials for review.

We urge the Board to not approve this project at this time until a more thorough analyses and proper transportation study has been performed. We also urge you to initiate a cumulative impact analysis on the development projects in queue and a thorough evacuation plan.

Evacuation and Emergency Access

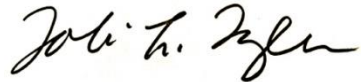
In recognition of numerous litigations over rural development projects in California, the California Attorney General released in October 10, 2022, CEQA guidelines stating that all local governments considering new projects "... carefully analyze and mitigate wildfire impacts as part of the environmental review process required by the California Environmental Quality Act (CEQA)." The guidelines also state: "Evacuation and Emergency Access: Evacuation modeling and analysis should be completed prior to the development's approval and include evaluation of the capacity of surrounding roadways, project impacts on existing evacuation plans, and proximity to existing fire services, among other factors." Although this project is in Nevada and not in California, the concept and need for a thorough evacuation plan study applies nonetheless. The current development boom initiated and advanced by TRPA and The Prosperity Center must be accompanied at the very least by adequate environmental analysis of both evacuation and cumulative impacts.

Roadway capacity is insufficient to achieve successful mass evacuation if needed in the case of wildfires, which are increasingly becoming common in the west as the climate continues to warm. A roadway-by-roadway evacuation capacity analyses study must be done before any further developments are approved. This study must include accurate intersection data traffic studies in order to analyze the cumulative impacts/effects on all basin wide environmental and traffic safety effects/impacts during mass evacuation.

The past several years has shown TRPA's allowances for increases in height, density and coverage, without adequate environmental review and purportedly to supply affordable housing that has not been realized, must be held accountable for the cumulative environmental impacts and increases in evacuation hazards due to larger and larger population in the Basin.

TRPA's more housing, more development, more trails, more tourist accommodations, more of everything without adequately addressing the transportation insufficiencies have shown the public that it has become emboldened and intoxicated with its own power. It is past time for TRPA to end this development boom and get back to its core responsibilities and duties in protecting Lake Tahoe instead of selling off Tahoe to the highest bidder. The Tahoe region must be protected from developers looking to cash in for private gain.

If you have any questions, please feel free to contact me.

A handwritten signature in black ink, appearing to read "Tobi Tyler". The signature is fluid and cursive, with the first name "Tobi" and last name "Tyler" clearly distinguishable.

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

tylertahoe1@gmail.com

From: [Revitalize Tahoe Biltmore](#)
To: [John Hester](#); [Julie Regan](#); [Paul Nielsen](#); [Marja Ambler](#)
Subject: [BULK] Letter of Support for the Waldorf Astoria Project
Date: Tuesday, April 25, 2023 9:28:27 PM

First Name: Tal
Last Name: Fletcher
Email: talfletcher27@yahoo.com
City of Residence: Truckee

Message: I've lived in the Truckee/Tahoe area for 30 years and have spent the majority of that time on the North side of the lake. I'm a home owner, small business owner, husband, father, and environmentalist. I'm a political centrist and involved with many local volunteer groups. For years, the Crystal Bay corridor has been an eyesore, even an embarrassment to our region. After reviewing the Boulder Bay project and discussing it with a wide variety of other locals, I believe it will be an important step to revitalize this important part of the lake.

For reasons ranging from environmental, to economic, to aesthetic, I believe that the Boulder Bay project will be a strong net positive for our community. I hope that you will vote to approve the plan revision. Thanks,

Date: April 25, 2023
Time: 9:28 pm



April 26, 2023

RE: Public Comment, TRPA Governing Board Meeting Agenda Item VII.A. April 26, 2023

Waldorf Astoria Lake Tahoe Project, 5 State Route 28, Crystal Possible Action Page 303
Bay, Nevada, Assessor's Parcel Number 123-051-02, et.al,
TRPA File Number CEPP2014-0138-01

WALT = Waldorf Astoria Lake Tahoe = Current project

EIS = Environmental Impact Statement

Dear Governing Board Members:

Please make this public comment along with Attachment B of my email part of the record and minutes as connected with today's Governing Board Meeting.

While TahoeCleanAir.org is in favor of environmentally sound redevelopment, based on a relevant and recent data driven cumulative impact Environmental Impact Statement (EIS), which includes a data driven roadway by roadway capacity wildfire and winter evacuation assessment, and an up to date relevant and recent EIS, TahoeCleanAir.org is opposed to the current project approval without **a relevant and recent supplemental cumulative impact EIS.**

Due to changing and new Lake Tahoe basin wide conditions, the original Biltmore project EIS in 2014, can no longer be considered as recent and relevant, and TRPA should not approve this project until the developer provides a recent and relevant **supplemental** data driven cumulative impact EIS.

Cumulative impacts result from the tyranny of the incremental impact of small decisions when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts result from individually minor but collectively significant actions taking place over a period of time.

New and relevant information since the 2014 original project EIS and the TRPA 2012 Regional Plan EIS

1. New and relevant information since the 2012 TRPA Regional Plan EIS and original 2012 project EIS includes well documented and photographed wildfire and winter mass public peril events. Any reasonable person would conclude that a **supplemental EIS** to both the 2012 Regional Plan and the original project EIS must be created to discuss and analyze the public health and safety wildfire and winter weather mass evacuation. The assessment must be based on scientific roadway by roadway evacuation capacity analyses data and must include accurate intersection data traffic studies in order to analyze the cumulative over safety impacts during mass evacuation during all seasons.

2. Tahoe visitor overcapacity, adversely impacting safe roadway capacity has increased significantly since both the 2012 TRPA Regional Plan EIS and the 2014 original project EIS. This TRPA created unsafe human and roadway over capacity is due to increased height, density and coverage permitted under the 2012 Regional Plan and the approval of short-term rentals. In the case of Washoe Tahoe significant and unsafe human and roadway overcapacity impacts caused in part by construction of the Lake Tahoe East Shore Trail and short-term rentals has dramatically increased.

3. Vehicle miles traveled (VMT's) are outdated and inaccurate per attachment B of this email.

It is self-evident that TRPA's past and current policies and project approvals have caused the Lake Tahoe basin to become **out of equilibrium and harmony** as the TRPA and its governing "partners" increasingly create opportunity for more growth, more building height, density and coverage, more human and traffic density overcapacity, more vehicle miles traveled, more out of control neighborhood and regional adverse impacts, more algae/invasive weed and species growth, more degradation of our streams, more micro plastics in the Lake, and decreased lake clarity over the last 20 years. **This, as the TRPA and developers fail to provide relevant cumulative impact basin wide EIS's and relevant supplemental EIS'.**

TRPA's continued reliance on an 11-year-old Regional Plan EIS for current and future planning and project decision making, in order to protect Lake Tahoe's environment under the Bi-State Compact, is outdated and represents prejudicial abuse of discretion, is subjective, arbitrary, and capricious. TRPA must provide a workable public health and safety wildfire and winter weather mass evacuation assessment and must require this particular project developer to provide a supplemental EIS to the original project 2014 EIS. This includes a relevant data driven scientific roadway by roadway evacuation capacity analyses data covering all roadways within Crystal Bay, Incline Village and Kings Beach, CA and must include accurate intersection data traffic studies in order to analyze the cumulative safety impacts during mass evacuation.

TRPA's mindset of approving more, more, more is cumulatively contributing to what is already widely recognized as a dire public safety peril. This, in the face of current unworkable and inadequate wildfire evacuation and winter travel safety capability due to human overcapacity. **TRPA continues to fail to provide adequate Public Safety "Environmental Threshold Carrying Capacity's ", as required by the Bi-State Compact.**

Any reasonable person would conclude, in light of the reality of the wildfire threat and inadequate evacuation capacity, the TRPA Regional Plan Chapter 6 Policies and Goals: Public Services & Facilities Element falls woefully short of providing an "Environmental Threshold carrying capacity", "to maintain public health and **safety** within the region", as discussed in the Bi-State Compact.

It is self-evident, and the TRPA is well aware, that the Lake Tahoe Basin and associated street and highway routes are dangerously capacity deficient, when it comes to safe, workable, and adequate wildfire evacuation. Yet, the TRPA continues to place its pro-growth, pro-developer priorities over resident and visitor public safety and protection of the Lake Tahoe environmental resources. This, as the agency relentlessly pursues support and approval of Area and Regional Plan additional height, density, and coverage code amendments and public and private projects without relevant up to date data driven basin wide cumulative impact EIS's and in the case of WALT, case a supplemental EIS.

Sincerely,
Doug Flaherty, President
Tahoe Sierra Clean Air Coalition (DBA TahoeCleanAir.org)
A Nevada 501(c)(3) Non-Profit Corporation
Registered to do business in California
774 Mays Blvd 10-124
Incline Village, NV 89451

[TahoeCleanAir.org Organizational Purpose:](#)

Tahoe Sierra Clean Air Coalition (DBA TahoeCleanAir.Org) is a Nevada 501 (c) (3) non-profit corporation registered to do business in the State of California. Our organizational purpose extends beyond protecting clean air, and includes, among other purposes, protecting and preserving natural resources, including but not limited to clean air, clean water, including lake and stream clarity, soils, plants and vegetation, wildlife and wildlife habitat including wildlife corridors, fish and fish habitat, birds and bird migration, insects, forest and wilderness from adverse environmental impacts and the threat and potential of adverse environmental impacts, including cumulative adverse impacts, within the Nevada and California Sierra Range, and its foothill communities, with corporation/organization geographical purpose priority being that of the Lake Tahoe Basin. Our purpose further extends to all things incidental to supporting environmental impact assessments and studies, including the gathering of data necessary to analyze the cumulative adverse environmental, health and safety impacts from public and private projects inside and outside the Lake Tahoe Basin, and addressing and supporting safe and effective evacuation during wildfire. Our purpose further extends to supporting transparency in government to ensure that our purpose and all things incidental to our specific and primary purposes are achieved.



April 25, 2023

Ms. Ann Nichols
NORTH TAHOE PRESERVATION ALLIANCE
P.O. Box 4
Crystal Bay, Nevada 89402

Subject: Waldorf Astoria Lake Tahoe Transportation Impact Study Peer Review

Dear Ms. Nichols,

MAT Engineering, Inc. has conducted a review of the *Waldorf Astoria Lake Tahoe Transportation Impact Study (LSC Transportation Consultants, March 23, 2023)* and provides the following comments. The transportation analysis is prepared to assess the potential traffic impacts associated with the proposed development of the Tahoe Biltmore Lodge and Casino area located in Crystal Bay, Nevada.

The proposed project (Waldorf Astoria Lake Tahoe or "WALT") is planned to construct 191 lodging and residential units, a 10,000 square-foot casino, restaurants, retail uses, and associated amenities.

1. **Existing Traffic Volumes:** The Baseline Scenario of the analysis and report assumes addition of the trips associated with the existing Biltmore use. Exhibit 3 in the study shows the Existing with Baseline Biltmore conditions traffic volumes. It is recommended an exhibit be added to the report that shows the existing (collected) traffic data at the study intersections and also the trips of the Biltmore assumed at the study intersections.

Please include data on hourly variation of traffic volumes for the study area to show how the analysis time periods were selected.

2. **Project Trip Generation:** The analysis assumes the hotel-related uses to be covered under the ITE hotel trip generation rates as amenities to the hotel. Typically, as general industry practice, the trip generation of hotel amenities are sometimes required to be calculated separately from the hotel use. In cases where the restaurants and other amenities such as spa, retail, meeting rooms, etc. can be expected to be an attraction for public patrons and non-hotel guests, the trip generation of those uses is calculated separately and added to the hotel use. Land uses such as restaurants and bars can especially draw patrons from the outside.

In some cases, an internal interaction and trip capture between the uses can be assumed. Otherwise, the trip generation as well as the project parking demand can be underestimated.

Since trip generation is the main foundation of determining future traffic conditions and potential project impacts, an underestimation of the trips can result in underestimation of the traffic conditions and potential project impacts.

The analysis appears to utilize an internal trip generation reduction of 34 percent and up to 55 percent for some land uses plus an additional non-auto mode trip reduction of 9 to 34 percent. An additional pass-by trip reduction is also applied to the restaurant uses. This appears to be a significant overall reduction of the project trips in the project trip generation analysis.

The internal trip adjustment of the site can be significantly affected by the dynamics of the site and the land uses. If the site is planned to include some uses that become and successful land mark and attraction, a larger number of its trips can be non-internal.

Additionally, When calculating internal interaction of trips between uses, the trips need to balance out. For example, if a hotel generates 500 trips and a retail use on the site generates 50 trips, an over adjustment of 20 percent would translate to 100 hotel trips and 10 retail trips (90 trips short of the hotel reduction). In such case, the controlling factor is the 10 retail trips that can be applied.

Non-auto trips for hotel uses might not be feasible since hotel guests in many cases arrive with luggage.

It appears there is available data on the trip generation of the existing Biltmore site. Does that data include information on the amount of internal trips or pass-by that can be applied to the trip generation of the proposed project instead of ITE-based adjustments?

The comment is based on MAT Engineering Inc. staff's experience in preparation of traffic studies for numerous hotels, resorts, and casinos.

3. **Baseline Conditions:** The analysis assumes full operation of the existing Biltmore as the baseline traffic conditions. Since the Biltmore has been closed for some time, can the Biltmore traffic be included in the baseline conditions and as a comparison to evaluate traffic conditions for the proposed project?
4. **Background Traffic:** Please clarify if there are there are other cumulative/background projects near the study are that can affect the traffic conditions and have they been accounted for in the future year analysis?

In addition to the changes in the background traffic volumes since the baseline conditions utilized in the traffic study, the transportation network has also been significantly changed. In the past years, roadway segment capacities have been reduced from four lanes to two lanes,

two roundabouts have been implemented, resulting in even longer vehicular queues that have been reported to extend for a mile or longer. Implementation of crossing guards for pedestrian traffic, has further extended the queues. With adding more trips, the proposed project would result in even longer queues and delay times.

5. **Study Area:** When preparing a transportation analysis, the study area is generally determined based on the magnitude of the project trips. If the project trip generation needs to be readjusted based on Comment 2, the study area might need to expand to include other intersections.

The study area should typically also include any nearby intersections that are currently experiencing long delays and queues.

6. **Level of Service Standards:** The report lists a number of jurisdictions and their respective level of service standard of operations. Please clarify what level of service standard is utilized for the analysis.
7. **Level of Service and Vehicle Queue Analysis:** Based on information provided by the local residents, some intersections have been reported to have extensive queues. Please clarify if the traffic analysis includes calibration of the results to reflect existing conditions.

Does the analysis utilize existing traffic signal timing? Use of optimized traffic signal timing can result in better than field conditions level of service results.

Please include a table showing the results of the queue analysis performed.

The level of service analysis should potentially be revisited based on items from Comment 2.

MAT Engineering Inc., appreciates the opportunity to provide this review letter. If you have any questions, please contact us at 949-344-1828 or at@matengineering.com.

Respectfully submitted,
MAT ENGINEERING, INC.



Alex Tabrizi, PE, TE
President

