

**From:** [Doug Flaherty](#)  
**To:** [Marja Ambler](#); [John Hester](#); [Cindy Gustafson](#); [Alexis Hill](#); [Jessica Diss](#); [Belinda Faustinos](#); [Wesley Rice](#); [Hayley Williamson](#); [Ashley Conrad-Saydah](#); [Francisco Aguilar](#); [John Friedrich](#); [Vince Hoenigman](#); [Brooke Laine](#); [James Settelmeyer](#); [Julie Regan](#); [Shelly Aldean](#)  
**Subject:** Erratum: Public Comment TRPA Governing Board Meeting Agenda Item XI. Public Interest Comments  
**Date:** Wednesday, July 26, 2023 10:49:16 AM  
**Attachments:** [TRPA Gov Board Evac Attach 7-26-23 - Flaherty.pdf](#)

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This public comment has been corrected by deleting the original 4th paragraph which was a repetition of Paragraph 2.

On Wed, Jul 26, 2023 at 10:03 AM Doug Flaherty <[tahoestierracleanair@gmail.com](mailto:tahoestierracleanair@gmail.com)> wrote:

Please consider this written comment part of the minutes and record during today's TRPA Governing Board Meeting Agenda Item XI. Public Interest Comments

Dear TRPA Governing Board:

TahoeCleanAir.org requests that the TRPA **cease and desist** approval of any regional project that causes increased height, density, and coverage until such time TRPA conducts a Tahoe Basin wide roadway by roadway wildfire evacuation capacity evaluation, of which must be based on substantial data and worst case fire evacuation scenarios. This critical roadway evacuation capacity evaluation should be part of a much needed cumulative impact supplemental EIS to the dated TRPA 2012 Regional Plan. The supplemental EIS must also include a human capacity and density environmental threshold.

TRPA's leadership and board culture has significantly tilted from its environmental mission, incrementally morphing instead into a reckless, unsafe pro urbanization, pro developer, pro resort, pro tourism agency.

Since adoption of the 2012 Regional Plan, TRPA and its partners have allowed Tahoe Basin human and roadway capacity to slip dangerously out of equilibrium and harmony, resulting in cumulative environmental degradation of the Lake Tahoe Basin, and creating year round dangerous health and safety perils for both residents and visitors alike.

We are fortunate that our emergency services are working together participating in drills and communications coordination, however, while drills and communication enhancements are important, they cannot take the place of a prudent foundational capacity planning process to help ensure resident and visitor safety during a wildfire evacuation.

Based on current and past TRPA knowledge regarding the basin's already human and roadway overcapacity safety perils, identification and quantification of the basin's roadway by roadway fire evacuation capacity is a critical environmental

and safety factor that must be undertaken and completed before any increases in height, density, coverage and increased tourists enticements can be approved. To fail to do so, both from an environmental and public safety standpoint is negligent.

TRPA's negligence extends to the fact that TRPA is well aware of existing human and roadway over capacity and have not taken even the basic planning steps (example: as recommended by CEQA) to require projects to conduct a worst case roadway by roadway wildfire evacuation capacity evaluation. TRPA has further ignored, among other information, the basins similar evacuation circumstances associated with the worst case Paradise (Camp) fire as well as the fire behavior of the more recent escaped Little Valley prescribed burn above Washoe Lake, NV, of which burned downhill growing to 2,291 acres over five days and tragically destroying 23 homes and 17 outbuildings.

Additionally, TRPA has failed to warn residents and visitors alike of the Wildfire safety evacuation perils in the Tahoe Basin. This, even though TRPA is well aware of the basin's current day to day human overcapacity environmental degradation, and human and roadway over capacity safety perils.

References of which TRPA is well aware are as follows and also attached:

**1. Butte County Grand Jury Report** - The report recommended a moratorium on new home construction in fire-prone areas and a halt to multifamily projects. In September 2009, the Butte County Board of Supervisors called the grand jury report "not reasonable", citing improved building codes and fire prevention requirements as arguments against a moratorium. Ten years later, the Camp Fire on Nov. 8, 2018, torched the foothill town of Paradise in Butte County, killing 85 people. Many people died in their homes, or cars as they tried to escape. The fire severed evacuation routes, gridlocking traffic, with one person still missing as of August 2, 2019, and injured 12 civilians and five firefighters.

<https://www.buttecounty.net/DocumentCenter/View/5116/General-Plan-2030-PDF>

**2. California Environmental Quality Act (CEQA)** – Best Practices for Projects - Evacuation modeling and analysis should include the following: “Evaluation of the capacity of roadways to accommodate project and community evacuation and simultaneous emergency access”.

<https://oag.ca.gov/system/files/attachments/press-docs/2022.10.10%20-%20Wildfire%20Guidance.pdf>

### **3. Photos of Paradise Fire (Camp Fire) victims and location where each victim died.**

<https://www.kcra.com/article/these-are-the-victims-of-camp-fire/32885128>

### **4. CalFire Video Part 3 – Aftermath – Paradise Fire**

<https://www.youtube.com/watch?v=ZKgsiMpV4Mk>

**5. CAPRDIO – July 11, 2019 – Camp Fire Evacuation Notifications** – From the ignition source, approx. 7 miles from Paradise, winds of 40 miles per hour shot embers along the ground and through canyon, and ***within 90 minutes, the eastern side of Paradise began to burn, according to Butte County dispatch recordings***, which CapRadio reviewed to better understand how agencies responded that morning.

<https://www.capradio.org/articles/2019/07/11/emergency-alert-will-you-be-notified-if-a-wildfire-is-heading-toward-your-town/>

### **6. Body Cam Footage – Evacuation from Paradise**

<https://abc7news.com/camp-fire-video-bodycam-of-evacuations/4850913/>

Sincerely,

Doug Flaherty, President

Tahoe Sierra Clean Air Coalition (DBA TahoeCleanAir.org)

A Nevada 501(c)(3) Non-Profit Corporation

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.

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