

XAVIER BECERRA
Attorney General

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DEPARTMENT OF JUSTICE



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January 26, 2021

Tahoe Regional Planning Agency
Regional Plan Implementation Committee
(Via email)

RE: VMT Threshold Update – RPIC Agenda Items No. 5 and 6

Dear RPIC members,

The California Attorney General's Office has participated in TRPA's stakeholder working group related to updating the VMT threshold since summer 2020, and has also engaged with and commented on issues related to updating the VMT threshold since at least 2017. We are carefully following TRPA's handling of this critically important issue, and write to express our concerns both with the substantive proposals and with TRPA's engagement with our office.

By way of background, our office participated in stakeholder working group meetings related to updating the VMT threshold on August 27, 2020, October 2, 2020, October 5, 2020, and December 10, 2020. The first three meetings covered staff's recommended VMT baseline, population baseline, project-level assessment tool, and mitigation fee update. The December 10 meeting covered staff's recommended per capita VMT reduction target. TRPA first released information about its proposed per capita VMT reduction target three business days before the December 10 stakeholder meeting. Until that point, staff had neither shared its intent to link the per capita reduction target to the draft 2020 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), nor released other meaningful details about the per capita reduction target. After that information was released, our office invested significant time reviewing the lengthy proposal, analyzing it in concert with our transportation consultant at Fehr & Peers, and preparing detailed comments. We shared those comments with TRPA staff during an extensive video call on December 22, 2020 and a follow-up call on January 15, 2021. Staff indicated that it planned to make changes based on our comments.

We hoped staff would release the updated materials in time for our office to review those materials, evaluate which of our comments had been addressed, and prepare a letter with any remaining and any new comments in time for this RPIC meeting. Unfortunately, staff did not share the updated materials until the close of business on Wednesday, January 20, 2021. This gave our office, and other stakeholders, four business days to review, analyze, and respond to the 200+ pages of material released in advance of this meeting. That is not enough time for our office to carefully review and comment on such a significant proposal.

As a committed partner that has participated in good faith in the stakeholder process since last summer, we would have appreciated the opportunity to share what we expect would have been helpful comments with RPIC at this meeting. In the future, when stakeholders have invested such significant time and resources in a collaborative process with staff, we hope staff will provide all involved stakeholders, including our office, with more time to review and comment on updated materials in advance of RPIC and Governing Board meetings, particularly where recommendations or direction are being requested.

Although we are diligently working on detailed comments that we will share as soon as we can, at this time we express continued concern about TRPA's proposal to decouple the VMT threshold from its traditional lake clarity protection function. We raised this concern before RPIC in July 2020 and throughout the stakeholder process; in our view, this concern has not been satisfactorily addressed. We are aware that there is new information in the staff report about lake clarity and we are reviewing it.

For now, it bears noting that under staff's proposal, total VMT in the region can increase without limit.¹ VMT, despite advancements in tailpipe emissions, has historically been understood to be related to NOx emissions, which has in turn been correlated with adverse effects on lake clarity. Indeed, the TMDL Pollutant Reduction Opportunity Report called for a reduction in total VMT via implementation of intercept lots and a basin entry fee, and the 2020 TMDL Performance Report notes that the TMDL strategy for reducing pollutants from atmospheric deposition relies on the TRPA air quality and transportation management plan to reduce nitrogen deposition from vehicle emissions. Total VMT is also related to other issues of concern in the basin, including reduced reliance on the private automobile, the balance between the manmade and natural environments, and concerns regarding mobility. It is not clear that the proposed replacement of an absolute basinwide VMT limit with a per capita standard alone will adequately account for these concerns, particularly given the issues addressed below with the present per capita threshold proposal.² Again, while staff's materials for this meeting may address these issues, we have not yet had a chance to review them in detail. As such, we must continue to urge caution in making the significant recommendation to abandon the basinwide threshold for total VMT.³

We are also concerned about staff's proposal to link the VMT threshold to the draft 2020 RTP/SCS, particularly since that plan has not yet been finalized or approved. Given our continued concern about decoupling the VMT threshold from its traditional lake clarity protection function and our concerns about eliminating an absolute basinwide VMT limit, we cannot and do not, at

¹ We discussed this point in detail in our July 21, 2020 letter to RPIC.

² We note that VMT per capita is the metric used in California for targeting greenhouse gas emissions reductions, and we fully support the use of a VMT per capita metric for that purpose.

³ We recognize that any adverse consequences associated with the proposed replacement of the absolute basinwide VMT threshold with a per capita threshold should be revealed through TRPA's environmental review of the proposal, but again, since that review has not yet been conducted or shared, we urge caution.

this time, endorse staff's proposal to link the VMT threshold to the RTP/SCS. We also take issue with the fact that the proposed threshold would apparently expire in 2045.

Staff's proposed threshold is a 6.8 percent reduction in per capita VMT below 2018 levels by 2045.⁴ This is the level of VMT reduction that staff anticipates will occur with full implementation of the draft 2020 RTP/SCS. However, our review of the draft 2020 RTP/SCS and associated environmental document indicates that the plan has overstated the level of VMT reduction that can be expected to occur under the plan. We discussed this point in detail in our October 23, 2020 letter to the TRPA Governing Board. After reviewing the available information, our transportation consultant concluded that full implementation of the RTP/SCS is likely to result in either no change in VMT per capita between 2018 and 2045, or an increase in VMT per capita between 2018 and 2045. Accordingly, to the extent basin stakeholders are assuming the RTP/SCS alone can achieve the 6.8 percent per capita reduction, that assumption is not supported by the RTP/SCS. While we support setting an aggressive VMT per capita reduction target, it should reflect the desired outcomes for the region that can reasonably be expected and attained. Further, if the VMT threshold is to be set based on the expectations of the RTP, it does not seem appropriate to approve the threshold in advance of the RTP being finalized and approved.

Finally, given that the existing threshold limits absolute basinwide VMT, prudence is particularly warranted to ensure that the per capita standard, which would allow total VMT to increase, is robust and meaningful. Given the huge amount of money that will be invested in transportation projects under the draft 2020 RTP/SCS, why is VMT per capita expected to essentially stay the same or get worse between now and 2045? If the VMT threshold is going to be linked to the draft 2020 RTP/SCS, the plan should, at a minimum, include projects that are more effective at reducing VMT from existing and future residents, visitors, and commuters. TRPA's draft plan does not do this. According to our transportation consultant, the plan could be revised to achieve greater VMT reduction per dollar of investment, especially if the projects and strategies increased the cost of vehicle use and improved the convenience and effectiveness of other travel options. If TRPA is going to link the VMT threshold to the draft 2020 RTP/SCS (an approach we do not currently endorse, as explained above), TRPA should improve the plan so that it does a better job reducing per capita VMT per dollar of investment, then accurately calculate the VMT reduction expected under the improved plan, and then use those accurate numbers to calculate and establish the per capita VMT threshold. Our office has already shared strategies for improving the cost-benefit ratio of the draft 2020 RTP/SCS with TRPA staff, and we are willing to continue providing support on this front.

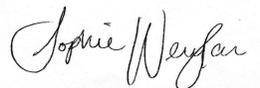
⁴ We note that TRPA's materials contain a confusing mix of references to the terms 'VMT per capita,' 'VMT per effective population,' and other related terms. The materials appear to conflate these terms in multiple instances. Clearly defining the proposed metric is important; we encourage TRPA to revise its materials to reduce this ambiguity.

January 26, 2021

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We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sophie Wenzlau".

SOPHIE A. WENZLAU
NICOLE U. RINKE
Deputy Attorneys General

For XAVIER BECERRA
Attorney General

cc: Arsenio Mataka, Special Assistant to the Attorney General

SAW:

Public Comment for TRPA RPIC Meeting 1.27.2021, Agenda Item #V RE VMT Measurement and Threshold

Submitted by Carole Black, Incline Village resident

The comprehensive report and analysis is impressive and the recommendations carefully documented. After reviewing I offer the following thoughts:

VMT/Capita certainly appears to be a preferred metric if the goal is to understand and impact the average usage/person in the context of enhanced interventions. Indeed it seems likely that it will provide a useful tool to assess intervention impact. I found the comment below in the 2017 RTP:

*Greenhouse Gas Emissions per Capita
Reduction from 2005 Levels*
*Target: 7% reduction from 2005 levels by 2020; 5%
reduction from 2005 levels by 2035*
Projected Estimates: 2020 – 8.8%; 2035 – 5.0%
Status: Meeting Target, Indicator Stable

VMT Total, however, appears to have been a more challenging metric in that it reflects total usage and may therefore be impacted by increases in user population even if VMT/capita declines. Nonetheless it is important in that it reflects the actual total impact on the environment and may stimulate additional parallel interventions, for example interventions to address over-tourism and management of total area occupancy. I found the table below in the 2017 RTP which clearly illustrates this concept:

Table 2.4: 2016 RTP/SCS Mobile-Source Greenhouse Gas Emissions for California Portion of Basin⁷

	2005		2020		2035
Daily VMT ²	1,041,890	Daily VMT	1,038,998	Daily VMT	1,149,601
Population ²	41,377	Population	43,341	Population	45,166
VMT/capita/day	25.18	VMT/capita/day	23.97	VMT/capita/day	25.45
GHG Emissions (tons/day) ³	445	GHG Emissions (tons/day) ³	428	GHG Emissions (tons/day) ³	461
GHG Emissions/Capita (pounds/person/day)	21.52	GHG Emissions/Capita (pounds/person/day)	19.75	GHG Emissions/Capita (pounds/person/day)	20.41
		% change GHG/capita from 2005	-8.2	% change GHG/capita from 2005	-5.2
		Adjusted % change GHG/capita from 2005 ⁴	-10.8	Adjusted % change GHG/capita from 2005 ⁴	-5.0
		SB 375 Target	-7	SB 375 Target	-5
		SB 375 Target Met?	Yes	SB 375 Target Met?	Yes

⁷ Information on this table can be found in the 2017 RTP Environmental Document

VMT/Capita projection looks great; yet projected total VMT increases by 10.6%.

Further though total VMT had been trending down, recent metrics look less positive:
From 2020 draft RTP:

DAILY VMT TRAVELED

TARGET: 10% Reduction from 1981

PERFORMANCE: NOT ON TARGET

1981 Daily VMT: 1,303,301
2018 Daily VMT: 1,398,994 

Figure xiv: Daily VMT Traveled

Thus, as you all are aware, the two different metrics provide information regarding different performance attributes. My vote: if the goal of the threshold metric is to monitor intervention effectiveness, then VMT/Capita. But, if there is interest in overall vehicle impact, as I'd suggest there should be, then VMT Total is preferred. Maybe the best thought would be to use both metrics in threshold reporting to present a balanced picture?

Thank you.

January 26, 2021

Tahoe Regional Planning Agency
Regional Plan Implementation Committee
128 Market St., Stateline, NV, 89410
Submitted via email

RE: Vehicle Miles Traveled Threshold Update and Project Level Analysis Assessment

RPIC Chair, Members and TRPA Staff,

The League to Save Lake Tahoe (League) appreciates the opportunity to provide comments on the Vehicle Miles Traveled Threshold Update and Project Level Analysis Assessment (VMT Threshold Update). The League is dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we support transportation solutions for Tahoe and advocate for the implementation of projects and policies contained within regional land use and planning documents that reduce dependence on the private automobile, including the Bi-State Compact (Compact), the 2012 Regional Plan Update (Regional Plan) and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The League appreciates being part of the vehicle miles traveled (VMT) working and technical groups. This threshold update and associated tasks are a top priority for the League, and we are happy to see the same level of focus from TRPA. We continue to share the vision expressed at the March 25, 2020 RPIC meeting where staff received direction to "update the current VMT threshold to address greenhouse gas (GHG) emissions, mobility, and other concerns related to vehicle travel (e.g., compact mixed-use development in town centers to reduce reliance on the automobile) so that the updated standard(s) can be applied at both the regional and project levels." With that vision in mind, we want to make sure that the VMT threshold helps ensure Regional Plan and RTP/SCS implementation.

Since 1982 when the VMT threshold was adopted, we have come to a better understanding of the contributors to lake clarity decline. Fine sediment pollution from paved surfaces, along with algae growth encouraged by tailpipe emissions contribute to clarity loss. Both of those impacts are linked to vehicle travel, making VMT an imperfect but helpful proxy for some of the key drivers of clarity loss in Lake Tahoe.

Whether intentionally or not, VMT is now at the intersection of rules and regulations that guide transportation, development, and environmental protection in Tahoe. Its position is not unwarranted. California recently recognized VMT as the best available measure for the impacts of vehicle travel. The state now requires a VMT analysis for any project that falls under CEQA. By following the example set by California, a leading force for environmental protection on the national and international stage, Tahoe is well-positioned to protect its unique natural resources.

While VMT certainly has value for Tahoe, the details and triggers that define it as a threshold for TRPA are old, outmoded and need to be brought up to date. The update is not just advisable, it is necessary so TRPA can help push forward related regional improvement plans, including its Regional Transportation Plan update. At the heart of the RTP is Tahoe's mandate to reduce

dependence on the personal automobile to get to, from, and around the Basin. Instead, a multi-modal transportation system that is frequent, free, and fun is the vision for the future. The VMT Threshold Update will provide important triggers for funding that sustainable, alternative transportation plan.

Our objective for the revised threshold is to set an ambitious but achievable goal to reduce the impacts associated with transportation on the environment and to facilitate the implementation of the RTP/SCS. The VMT threshold must ensure that new development and redevelopment projects approved by TRPA do not worsen transportation impacts but move us towards the overall reduction goals. The VMT threshold can and should help Keep Tahoe Blue, and we are committed to ensuring it will.

For nearly a year, the League's policy, advocacy, and transportation experts have been deeply involved in discussions on updating the VMT threshold. Below are our current high-level comments. We will provide more detailed comments as the VMT Threshold Update progresses and, as always, we offer to continue to meet with TRPA's board and staff to discuss details and nuances around the suite of actions, policies, and revisions.

VMT Threshold Target

Although the proposed 6.8% per capita reduction should be more ambitious, we acknowledge that it will require full implementation of both the RTP and RPU. As we improve our transportation system over the coming years, we should strive for more aggressive reduction targets.

Implementation

We are largely supportive of the implementation plan proposed by TRPA. We specifically support these aspects:

- The proposed automatic triggers which will require all projects to be VMT neutral if as a region we are not collecting revenue to implement the RTP by 2024,
- The planned progress checks and resulting mitigation fee increases if we are not on track to meet the VMT reduction target.

However, we propose flipping the order - requiring VMT neutral development for projects that are not screened out in the project-level assessment until a regional revenue source is being collected.

We would also like the VMT reduction progress reviews to occur every four years instead of the proposed eight years. It is important that the advisory body's biennial assessments result in actions if we are not on track to meet RTP and VMT goals. For example, some of the proven-effective VMT mitigation strategies identified in the attachment for agenda item 6 and its Appendix B2 such as implementing commute trip reduction programs and creating Basin-wide parking maximums should be automatically triggered if we are not on track to meet reduction targets by a set time.

Some of the VMT impacts from existing development should be reduced through RTP implementation, but in order to meet our regional target existing development needs to be specifically addressed. This could be accomplished through a VMT retrofit program and implementing existing plans and regulations such as no parking on dirt, the employer-based trip reduction program, and commercial floor area verification. There could also be a role for the mitigation fee here, discussed below.

Project Level Assessment

This is one of the final aspects of the work plan and has not benefited from the same level of robust discussion and response to stakeholder comments as the target and implementation aspects. We are concerned about the initial project screening that will determine if and how much mitigation will be required and if a detailed VMT analysis will be required. Screening out a large number of projects could make it difficult or impossible to achieve the VMT reduction target.

We recommend that the purpose and need for these complicated changes be clearly articulated prior to adoption of this update. We would like TRPA to explain what is not working with the current daily vehicle trips (DVTE) standard of significance and propose a simpler update. One approach, supported by the *Review of Screening Criteria for VMT* (Attachment D for the January 27th meeting), could be converting 100 and 200 DVTE to VMT for a handful of the most common uses and then applying the 20% and 35% bonuses for Town and Regional Centers. The goal should be to promote redevelopment into Town Centers so the screening should focus development in areas identified in the Regional Plan. Keeping it simple helps reduce barriers to redevelopment and the simplest method may be to either not screen out any projects or uses that are outside of Centers, or screen out even more projects and uses that are within Centers.

We generally support screening out affordable housing projects, but the proposed screening criteria could undermine our efforts to reduce VMT by not accurately identifying and mitigating new and additional VMT. Monitoring the VMT impacts from large affordable housing developments and in high-VMT areas would help ground truth assumptions and inform a long-term decision about whether to screen out all affordable housing projects or just those in certain areas and/or with certain VMT-reducing aspects. We provide more details on the need for ground truthing below.

Through the TTAC and meetings with TRPA staff, we provided comments on the parking-based screening criteria. The current proposal is to require any project that may be screened out to use parking rates less than the local minimum parking rates. While we support efforts to reduce parking requirements, parking rates are different all over Tahoe and they can easily change. This could create a perverse incentive for jurisdictions to NOT reduce parking minimums (higher minimums allow more projects to meet the basic screening criteria). A few ideas have been proposed, such as using national parking rate averages or creating some specific to Tahoe. The League has also regularly suggested TRPA using its authority to create Basin-wide parking maximums in the Code or Ordinances instead of deferring to local parking requirements. No changes have been made to this screening criteria based on feedback so far.

The League and other stakeholders have provided comments on the updated project-level assessment tool ("TRIA 2.0" or any other). We have not seen how those comments are being incorporated yet.

Air Quality Mitigation Fee

The mitigation fee update proposed is streamlined and well aligned with the RTP. We believe there is some room for improvement to help prioritize projects in high-VMT per capita areas. We would like TRPA to consider dedicating a portion of the mitigation fee to the same jurisdiction/region/corridor where the fee is generated (like TMDL and coverage transfers) with the remainder going to regional projects.

Monitoring

As with the project-level assessment, there has not been much information on the monitoring aspect yet. Moving to a per capita VMT efficiency standard is a big change from the absolute VMT standard that the Basin has been operating under since the 1982 adoption of threshold standards. Therefore, it is vital that a monitoring system is created to measure progress toward threshold attainment on the regional and project levels. The monitoring needs correspond to trigger points that immediately initiate adaptive management measures as discussed above. In order to support the monitoring plan, we will need to see robust monitoring and adaptive management of progress toward the VMT reduction target, effectiveness of implementation actions, and ground truthing of project-level assumptions.

Ground Truthing

“Additional Recommendations” in Attachment D: *Review of Screening Criteria for VMT* includes running several types of projects through the screens and making adjustments as necessary. This is a fantastic idea that the League has encouraged starting with the travel demand model update in 2018. We are looking forward to seeing the results of this exercise before finalizing the screening criteria. A comparison of how they would play out in the different alternatives would be particularly useful. Further we strongly recommend running the projects not only through the screening criteria but through the full suite of tools and policies proposed to see how it all works together and how these projects would be treated differently under the current and proposed schemes. Finally, some projects that are screened out - such as large affordable housing projects or commercial projects that are near the screening threshold - should be monitored for at least the first five years to validate the assumptions.

Thank you again for your work tackling one of Tahoe’s most impactful and persistent environmental problems. We look forward to working with TRPA and stakeholders to achieve what we believe are our common goals. Please do not hesitate to contact me directly with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Gavin Feiger", with a long horizontal line extending to the right.

Gavin Feiger
Senior Policy Analyst

Tracy Campbell

From: Gina Thompson <ginathompson4tahoe@yahoo.com>
Sent: Saturday, January 23, 2021 7:34 AM
To: Meetings
Cc: ginathompson4tahoe@yahoo.com
Subject: Meeks bay boating pier

Follow Up Flag: Follow up
Flag Status: Flagged

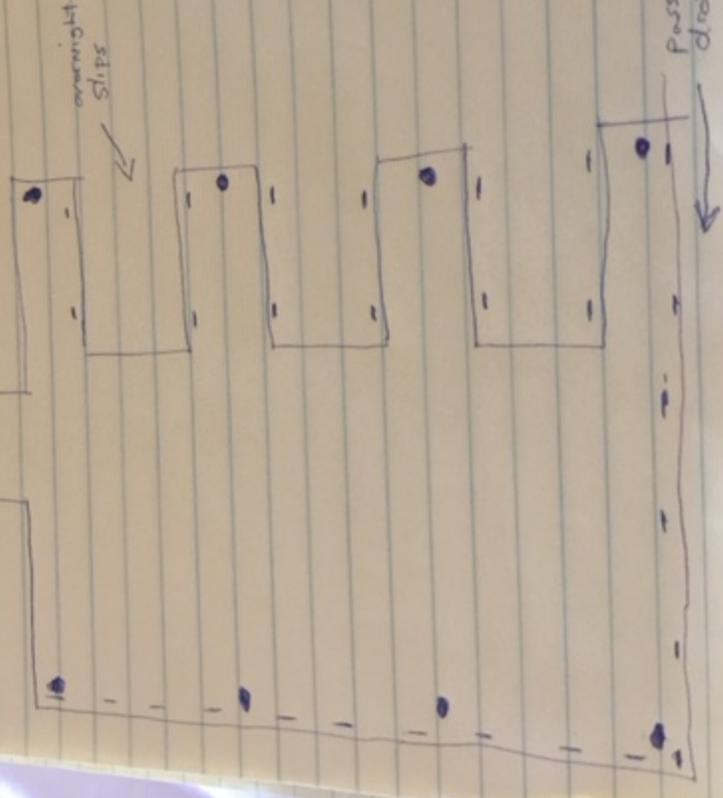
Our family boats to Meeks Bay every year and enjoys the setting and facilities. My dad is 92 years old and still likes to get off the boat to stretch his legs here.

Question: have the project designers for Meeks Bay considered different configurations for a boating pier instead of the traditional pier which may not be as aesthetic or functional?

The floating piers with built in slips allow easier and safer access for boaters. Boaters would like to continue to access the campground, restrooms and food vendor. Floating docks (example drawn below) could be considered instead of the current proposal which sticks out so far in the bay that it is objectionable to some. One could be located to serve day users near the snack shack and a smaller dock version could be located near the new campground facilities for overnight use. Thank you for considering options that could mitigate the conflict between boaters and kayakers, without creating exclusion of user groups on these treasured public lands. Gina Thompson

Drawing is not to scale...please don't laugh (consider design for approx 10 boats)

Meads Bay Floating Dock
(Sketch Not to Scale)



Tracy Campbell

From: Gina Thompson <ginathompson4tahoe@yahoo.com>
Sent: Friday, January 22, 2021 2:41 PM
To: Meetings
Subject: Meeks Bay boating pier

Follow Up Flag: Follow up
Flag Status: Flagged

Question;

Have you considered other configurations for the boat up pier? Their may be more efficient designs at are more visually appealing available.

Thank you. Gina Thompson

Tracy Campbell

Subject: FW: comments on Sugar Pine Village

From: Jane Grey <janepezua@gmail.com>

Sent: Tuesday, January 26, 2021 4:47 PM

To: Brandy McMahon <bmcMahon@trpa.org>

Subject: comments on Sugar Pine Village

Good evening,

I am unable to attend the virtual meeting due to work conflicts, but wanted to share some thoughts on the Sugar Pine Village project for consideration during discussion.

I would propose that the project be reduced to include only two levels in all dwelling structures to limit strain on the surrounding area. This would improve the aesthetics of the project while also ensuring that the surrounding neighborhood and streets can handle the still drastic increase in residents, vehicles, etc.

I would also like light pollution to be taken into account when choosing lighting for the Sugar Pine Village project. Light pollution is a problem in Tahoe, and while promises for good lighting are part of this project, I'm more concerned with uncontrolled lighting from the use of poorly targeted, overly bright, and improperly shielded outdoor lighting, resulting in waste of energy and ill effects to human and animal health. I hope that all installed light fixtures on buildings and over parking areas, cross walks and other common areas will be dark sky compliant with shields to minimize glare and light trespass, and also make it easier for people to see at night.

Thank you for considering my comments,

Jane Grey
1909 B Street

John Messina

PO Box 7115, South Lake Tahoe, CA 96158

RECEIVED

JAN 25 2021

TAHOE REGIONAL
PLANNING AGENCY

TRPA

PO Box 5310, Stateline, NV 89449

✓ Hand Delivery - 128 Market Street, Stateline, Nevada

Email us: trpa@trpa.org

**RE: Sugar Pine Village Workforce Housing Should be DENIED Approval
January 25, 2021**

Because I am being denied the right to appear at this alleged meeting in person, I request that my statement be read into the record as well as the written copies included in the public responses.

This proposed project will have a significant impact on the "Y"/Bonanza area and change the use of the land involved. It therefore must have a full CEQA Environmental Impact Report before it can be approved. The proposed additional 284 welfare housing units will further detract from our area by adding 700 more vehicles on the street trying to accessing major roadways.

To make matters worse, welfare housing also drains funds from other needs because it forces cities to raise taxes on hard working middle class citizens to compensate for the tax money being diverted. Things like waiving permit fees, free RUUs (development rights running around \$30,000 per unit or \$8,520,000 for this project alone.

And to top it off, they never have to pay property tax on the welfare developments — forcing other taxpayers to make up for the loss in taxes that would otherwise be generated by the property. The Conservancy is not even offering to provide "In Lieu of Funds" to compensate for the tax losses.

The TRPA's duty to preserve the quality of life for all residents does not give them the right to degrade the quality of life for those who have worked for years to purchase their own homes in favor of those who seek taxpayer assistance for housing. There is no other area of the city that has such a high concentration of welfare housing. The "Y"/Bonanza residential area already has 90% of the affordable/welfare housing in the city.

Excessive welfare housing density unquestionably hurts the community by labeling the entire area as undesirable and depresses home values and increasing crime. The fact that these units will never increase in value further damages the values of privately owned homes. Historically, welfare housing projects have deteriorated into slums.

The first and only actual public meeting on the issue of the Sugar Pine project illustrates the real problem, they titled the meeting "Housing Solutions at the Y". The Bonanza area has been targeted by the city, TRPA and other agencies as the dumping ground for all the undesirable welfare housing and now to add insult to injury we have three illegally established homeless shelters. This is not right nor fair to the homeowners.

Already in that neighborhood there are six HUD welfare housing projects within one mile of the proposed development sites, and there are three more nearby totaling over 600 units, housing about 1,500 welfare recipients. Now they want to build three more housing projects and three homeless shelters here. This does not include additional private low rent housing units in the area and the proposed welfare housing on the greenway behind McDonalds that would dump another 300 welfare units on the "Y"/Bonanza neighborhood. This area has more than enough, it is time to start looking elsewhere to solve welfare housing problems.

The proposed Sugar Pine project in the "Y"/Bonanza area significantly increases the welfare housing there because of problems created by Douglas County which has absolutely no workforce housing at Stateline. The housing needs of Douglas County should be fulfilled in Nevada, perhaps Round Hill or Zephyr Cove, not dumped on California taxpayers and the "Y"/Bonanza residents.

Most of those complaining about housing issues in South Lake Tahoe are actually Douglas County employees that work in Nevada at Heavenly Mountain Resort and the casinos. They need welfare housing because Nevada allows employers to pay as little as \$8.25 per hour, with most not even getting full time employment - so the tourist industry does not have to pay them benefits the same as Walmart did.

The Nevada employers don't pay their workers a living wage then pocket the saving and stick California's welfare system for housing, medical care and other necessities for their employees. Nevada needs to take care of the problems it is creating, not dump them on the taxpayers of South Lake Tahoe, El Dorado County and Californians.

We not only are getting stuck with subsidizing the profits of the greedy tourist industries who are dumping the cost of housing their workers on us, we are also getting stuck with the welfare payments, Medicaid, Calfresh (food stamps) and other costs for those same Nevada employees who are able to establish residency in El Dorado County by taking advantage of our welfare housing. That is how the Nevada tourist industry is getting away with paying substandard wages to it's employees while making millions in profits.

The Conservancy abused its authority in acquiring these properties in the first place. They were not acquired to "Restore and enhance the extraordinary natural and recreational resources" as authorized, instead it is part of their scheme to monopolize all prime retail, commercial and residential property they can acquire for the purpose of dictating future development of every kind. The Conservancy should stick to "environmental" issues not development or "social engineering."

What the Tahoe Basin needs is industries that provide jobs with decent living wages, something the tourist industry does not do (unless you are one of the tyrants owning them). I believe it would be best for everyone if all the properties held by the Conservancy not related to restoration of the environment be auctioned off to the public as specified by California law in order to allow free enterprise to utilize them to create industries and businesses that are not dependent on the miserly tourist industry. Because obviously, the Conservancy is only interested in fattening the pockets of the wealthy tourist industry interests.

Don't let them destroy our neighborhood at the "Y"/Bonanza.

Say "No" to more welfare housing at the "Y"/Bonanza area.

John Messina is a South Lake Tahoe "Y"/Bonanza resident.

PS: Two days notice is insufficient for important issues and Zoom is not a real meeting and plagued by security problems.

Very truly yours,

John Messina

cc