

**TRPA
APC
PACKETS**

**AUGUST
1982**

August 1982

Phil

NOTICE OF MEETING OF THE
ADVISORY PLANNING COMMISSION OF THE
TAHOE REGIONAL PLANNING AGENCY

NOTICE IS HEREBY GIVEN that on August 11, 1982 at
9:00 a.m. at the hearing room of the Tahoe
Regional Planning Agency, located at 2155 South Avenue, South
Lake Tahoe, California, the Advisory Planning Commission of
said agency will conduct its regular meeting. The agenda for
said meeting is attached to and made a part of this notice.

Dated: August 2, 1982

By: *Raymond*

TAHOE REGIONAL PLANNING AGENCY
ADVISORY PLANNING COMMISSION

TRPA Office, 2155 South Avenue
South Lake Tahoe, California

August 11, 1982
NOTE: 9:00 a.m.

PRELIMINARY AGENDA

- I CALL TO ORDER AND DETERMINATION OF QUORUM
- II APPROVAL OF AGENDA
- III DISPOSITION OF MINUTES
- IV PLANNING MATTERS
 - A. Environmental Impact Statement for the Establishment of Environmental Threshold Carrying Capacities
 - B. Work Program for Development of the Regional Plan
- V REPORTS
 - A. Recommendations to Governing Board on Adoption of Environmental Threshold Carrying Capacities
 - B. 208 Status Report
 - C. Status Report on Delegation of Authority and the Role of the APC
 - D. Public Interest Comments - ~~State Reports to GSB/APC?~~
 - E. APC Members
- VI RESOLUTIONS
- VII CORRESPONDENCE
- VIII PENDING MATTERS
- IX ADJOURNMENT

APC Motions
(1) New Plan
(2) Adopt plan in advance
of imp. ords.

} PAB/M.H.

~~State Reports to GSB/APC?~~

EIS Subcommittee - SAs for EIS
- Judy Unsicker
- J.R.
- Rich Heitlinger

TAHOE REGIONAL PLANNING AGENCY

P.O. Box 8896
South Lake Tahoe, California 95731

2155 South Avenue

(916) 541-0246

MEMORANDUM

August 3, 1982

TO: TRPA Advisory Planning Commission

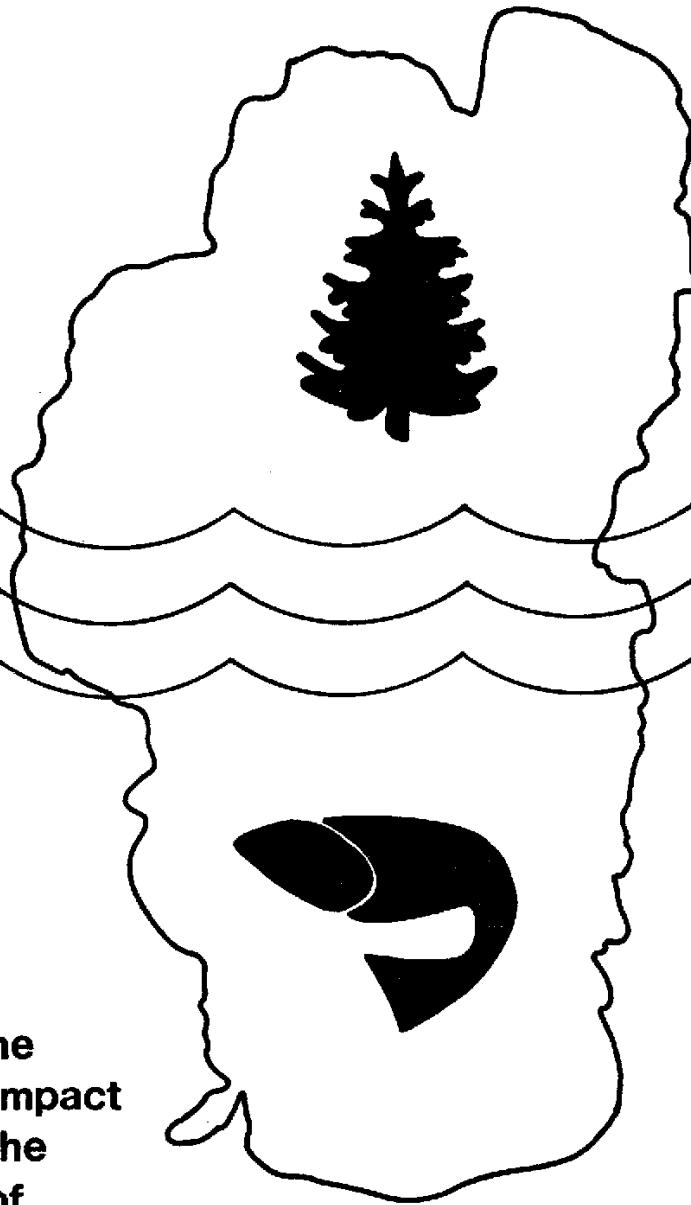
FROM: Agency Staff

SUBJECT: APC Agenda Item IV, A and V, A - Environmental Threshold Carrying Capacities

Attached is the Addendum to the Environmental Impact Statement for the Establishment of Environmental Threshold Carrying Capacities. This document was provided the Governing Board for their consideration for certification of the document at the July meeting. No action was taken by the Board.

Staff provided the Governing Board with the Executive Summary detailing staff and the consultant team recommended thresholds and the document comparing that recommendation with the Advisory Planning Commission's recommendations developed July 14. Both documents were provided APC members July 19 and are not included in this packet.

RCS:md
Attachment



**Addendum to the
Environmental Impact
Statement for the
Establishment of**

Environmental Threshold Carrying Capacities

TAHOE REGIONAL PLANNING AGENCY

P.O. Box 8896
South Lake Tahoe, California 95731

2155 South Avenue

(916) 541-0246

MEMORANDUM

DATE: August 2, 1982

TO: TRPA Governing Board

FROM: Agency Staff

SUBJECT: Addendum to the EIS for the Establishment of Environmental Threshold Carrying Capacities.

The following changes should be made to the July 29, 1982 Addendum to the above subject environmental impact statement:

Page 4: Third sentence under the Employment and the Local Economy paragraph should read "Some of the anticipated. . . benefits from forest management practices, . . .".

Page 5: Third sentence under the Water Quality paragraph should state "Staff estimates a 50 percent reduction (not 53) . . . management."

Page 6: Add a double asterik (**) behind the word ANNUAL in the column heading.

Page 11: In the second sentence of comment 13, cross out the word adequately to read "The comment specifically addresses . . . Plan."

Page 23: The first sentence in Response to the first Comment should read "The comment is correct in stating that staff and the consultant team failed to utilize TRG's recent work in the littoral zone."

Page 28: The first sentence in Response to the second Comment should read "Noise does impact fish."

/sf

ADDENDUM TO THE EIS

I. Introduction

An environmental impact statement describing a recommended set of environmental threshold carrying capacities and alternatives to it was made available for a 60 day public review period beginning May 19, 1982. The proposed action and alternatives described specific threshold standards necessary to maintain significant scenic, recreational, educational, scientific, and natural values of the Lake Tahoe Basin and to maintain public health and safety. The environmental consequences of implementing the alternatives were identified in broad terms since the land use plan necessary to implement and achieve the thresholds has not yet been developed.

The proposed action was a staff and consultant team recommendation initially developed in early May, 1982. It has subsequently undergone review and revision throughout the course of the threshold establishment process. Changes have been made in response to Governing Board direction, input from governmental agencies and other organizations, comment from the general public, and as staff and the consultant team have more precisely refined available data. The revisions have been documented on an on-going basis in an extensive draft study report prepared by staff and the consultant team. The environmental impact statement has not documented these changes.

The purpose of an environmental impact statement is to disclose the environmental consequences of taking a specific course of action and the alternatives to that action. It is not necessarily a decision document, although the evaluation of the potential impacts is a consideration in reaching a decision. Through discussion of a range of alternatives, the EIS must make the reviewer aware of the potential consequences of implementing, in this case, environmental threshold carrying capacities. This environmental impact statement meets these criteria even though the thresholds recommended to the Governing Board have, in some instances, been refined in the interim. The document is adequate to ascertain the broad impacts of adopting environmental threshold carrying capacities without benefit of having land use alternatives developed to indicate precise implementation and attainment.

Not everyone reviewing this environmental impact statement has reached the same conclusion. By the end of the public review period, July 17, 1982, the Agency had received 56 written responses. Of that number, 21 specifically addressed the adequacy of the statement. All respondents also expressed opinion on specific thresholds and the level at which they should be set. The purpose of this document is to respond to the comments received on the adequacy of the EIS, display but not respond to public comment on specific thresholds, and indicate necessary changes to be made in the impact statement prior to Board certification. This addendum contains five sections. The first is the introduction followed by staff's response to general comment received on the adequacy of the EIS. Section 3 summarizes public comment received on the thresholds. Section 4 responds to specific, technical comment concerning the EIS and Section 5 is an errata list.

II. Response to General Comments on the Adequacy of the EIS

1. Eight of the public comments received on adequacy of the EIS said that it did not adequately address a broad-enough range of alternative thresholds. Persons and agencies making this comment were; TRPA's Advisory Planning Commission, the South Tahoe Public Utility District, the City of South Lake Tahoe, Park Cattle Company, the Resources Agency of California, the Tahoe-Sierra Preservation Council, the California State Water Resources Control Board, and the Lahontan Regional Water Quality Control Board.

The EIS for the threshold study discusses recommended thresholds for 34 separate environmental sub-components. It includes three broad alternative scenarios and specific alternative thresholds for 19 of the subcomponents. TRPA staff feels it has adequately addressed a range of alternatives, and that there are reasons why the EIS does not contain alternatives for every subcomponent.

First, the language of the Tahoe Regional Planning Compact states that environmental thresholds are standards necessary to maintain significant environmental, educational, scientific, or natural value of the region or to maintain public health and safety within the region." This language, although broad and general, to some extent narrows the range of possible alternatives.

Second, TRPA started the process of establishing environmental thresholds by developing value statements for each component, (See EIS, pp. 4-6). TRPA developed these value statements with full participation of the Governing Body, the Advisory Planning Commission, the technical resource team, and the public. These value statements continued the process of narrowing the range of feasible alternatives for thresholds.

Third, many thresholds do not lend themselves to the identification of alternative threshold values since they represent a point, or end-state, beyond which significant environmental degradation would occur. Thus, in many instances, staff could not justify proposing alternative thresholds. The text of the EIS discusses, and essentially dismisses, three broad alternative scenarios; maximum environmental protection, minimum environmental protection, and no action. In fact, these broad scenarios apply to every subcomponent and represent possible alternative thresholds. Where staff felt there was adequate justification to propose alternatives beyond these broad scenarios, they did so.

A fourth reason for the apparent scarcity of alternatives has to do with the general intent of the EIS. A primary purpose of the EIS was to disclose all the information available regarding the need and best values for environmental thresholds. Staff felt that the purpose of disclosure would be best-served by brevity and conciseness. Staff refrained from presenting and analyzing "strawmen" alternatives which would make the EIS much longer and more complicated while adding little to public knowledge of the need for thresholds. Staff, the Governing Body, and the public have all been under extreme time and resource pressures to complete the EIS and Study Report within the mandated time schedule. Again, brevity in the EIS was in the best public interest.

Because the link between environmental thresholds (which the Compact defines as environmental standards) and their impacts is indirect, it is difficult to quantify the impacts for the recommended thresholds. Since most impacts will depend upon how the affected community implements the thresholds through the

Regional Plan, the impacts of thresholds must be described in a general way. Bracketing each recommended threshold with hypothetically feasible alternatives would further complicate this analysis and tend to indicate to the reader that the analysis was more precise than it actually is. In-depth analysis of alternatives will come in the Regional Plan which will analyze in detail alternative means of meeting threshold values.

Finally, in passing judgment on the adequacy of the alternatives discussed in the EIS, one must consider the interrelationships among the various thresholds. The thresholds tend to be mutually supportive and strongly interconnected. Many examples of this exist, such as the need to protect stream zones for purposes of water quality, soil conservation, wildlife, fish, vegetation, recreation, and scenic value. Looking at a single threshold value, a reader may conclude that insufficient attention has been paid to alternatives. However, looking at the thresholds as a unit, one must conclude that the EIS identifies and analyzes a broad range of alternatives.

2. Twelve agencies and individuals made similar comments that the EIS was deficient in its discussion of socio-economic impacts, feasibility, implementation methods, mitigation approaches, and attainability. The agencies and individuals were: the TRPA Advisory Planning Commission, the South Tahoe Public Utility District, the City of South Lake Tahoe, the Resources Agency of California, the Tahoe Sierra Preservation Council, the California State Water Resources Control Board, the Lahontan Regional Water Quality Control Board, the Soil Conservation Service, the South Lake Tahoe Visitors Bureau, the Nevada North Tahoe Property Owners Association, and Neva Roberts (Council member, City of South Lake Tahoe). The following discussion addresses these issues in turn:

Socio-Economic Impacts

It is indeed important to assess the social and economic impacts of the recommended thresholds to place them in perspective for the affected community. However, in developing the thresholds, staff's primary focus has been on protection of environmental values for, as Article I(a)(6) of the Tahoe Regional Planning Compact itself states, "Maintenance of the social and economic health of the region depends on maintaining the significant scenic, recreational, educational, scientific, natural, and public health values provided by the Lake Tahoe Basin."

In the threshold EIS, the discussion of socio-economic impacts is very general, due to the nature of the thresholds themselves. Since the thresholds represent environmental standards and do not specify exact implementation steps, their impacts will not be fully realized until the development of the regional plan. Nevertheless, the EIS and the Study Report both discuss socio-economic impacts in the context of each of the environmental subcomponents.

The destination-resort character and seasonal economic base of the Tahoe Basin bring about certain social and economic problems which are difficult for any planning effort to affect. These problems are a transient population, high unemployment, high welfare and benefit payments, and crime (WFRC, 1979). There is a serious shortage of housing and support services in the Basin. The tourism market may have reached saturation, which will result in a declining rate of

economic growth. The employment base consists primarily of just three components: gaming, retail trades, and construction.

It is staff's position that the EIS does adequately address socio-economic impacts of the thresholds, given the qualifications discussed above. However, to aid in understanding the cumulative impacts of all the threshold components, a summary of those impacts - on housing, property values, employment, the local economy, the fiscal situation, and the quality of life - will be repeated.

Housing. The impacts of recommended thresholds on the cost and availability of housing will probably be mixed. To the extent that water quality, soil conservation, and other thresholds require continuing controls on development, they may aggravate the housing shortage. However, if the regional plan emphasizes redevelopment in certain areas and allows orderly growth of housing stock in the Basin, it may mitigate the situation.

Property Values. The impacts of the thresholds on property values will most likely be offsetting. On one hand, certain restrictions on new construction may be necessary to implement the water quality, soil, vegetation, wildlife, and scenic thresholds and may, therefore, have a negative impact on some property values. On the other hand, the thresholds as a group will maintain and enhance the overall recreational and scenic values of the Basin, with a resulting positive impact on property values. (A study for the California State Water Resources Control Board completed in 1980 predicted a modest net gain in property values for the Basin, based on the provisions of the State Board's plan.)

Employment and the Local Economy. Overall, it appears that the impacts of the thresholds on employment and the local economy will be positive. However, achieving the thresholds will require substantial public and private investments. Some of the anticipated benefits of the thresholds are improved tourism and retail trades, better economic stability, economic benefits from for management practices, and a long-term improvement of recreational infrastructure. Some of the anticipated costs are the cost of installing BMP's (best management practices) on public and private lands, the cost to individuals for certain restrictions on development, costs of transportation improvements, the cost of heating fuels to replace wood, cost of mufflers on combustion engines to reduce noise, the costs of fisheries improvements in tributary streams, the costs of providing access to recreational facilities, and the costs of making scenic improvements.

The Fiscal Situation. The fiscal implications of adopting thresholds for units of government and utilities appear to be mixed. On the whole, the thresholds should create a better balance between costs and revenues, but the impacts will vary greatly from agency to agency. Remedial programs for water quality control and improvement of air quality will represent a major expense for local, state, and federal units of government. These costs would be obligated even without adoption of thresholds as other plans require improvement. Water and sewer agencies, which depend on fees for the bulk of their income, may be adversely affected if the regional plan calls for some continuing controls on new development. Many of these costs may be partially offset through new and innovative strategies of acquiring revenue.

Quality-of-Life. On balance, the thresholds will bring about a strong positive impact on quality-of-life in the Basin. Some of the major benefits will be

rehabilitation of aging properties and structures, less traffic congestion, better fishing, enhanced views, and - overall - an enhanced Tahoe environment. Some potential impacts which some persons may perceive as negative impacts are a reduction in the use of private motor vehicles, restrictions on wood burning, and the loss of personal freedom to enjoy off-road vehicles, especially those that exceed noise standards.

Summary. As the Compact intended, the environmental thresholds staff has recommended will clearly have a positive overall impact, not only on the physical environment of the Tahoe Basin, but on the social and economic environment as well. There will, of course, be costs involved in meeting the thresholds. For further discussion of costs, see Attainability, below.

Technical Feasibility and Methods of Implementation

TRPA staff agreed with the public comment that all recommended thresholds must be technically feasible. In staff's opinion, all the thresholds are feasible. The means of implementing the thresholds will be determined in the regional plan and are not appropriate for discussion within this EIS. However, since staff and the consultant team have made various public presentations on this issue in recent months, this addendum includes the following excerpts from those presentations.

It is important to note that these excerpts are simply a discussion of feasibility and possible implementation steps. It is not an outline of the upcoming regional plan. For this addendum, staff will confine its discussion to those areas where the public has questioned the technical feasibility or means of implementation.

Water Quality. Several public comments have questioned the feasibility of meeting the recommended reduction in dissolved nitrogen loading to Lake Tahoe of 25 percent. The recommended reduction is technically attainable through a combined attack on nitrogen loads in surface runoff, groundwater, and atmospheric deposition. Staff estimates that a 53 percent reduction in loads from surface runoff is feasible through a program of fertilizer management, SEZ restoration, remedial measures, street sweeping, and forest management. Staff also estimates that a 30 percent reduction in groundwater loads is feasible through fertilizer management, previous phase-out of septic tanks and spray disposal of sewage, and remedial efforts. With respect to atmospheric deposition of inorganic nitrogen, a 20 percent improvement is possible through a cleaner vehicle fleet mix and vehicle-mile reductions both within and outside the Tahoe Basin. (An extensive monitoring program is needed to estimate the local and regional inputs.) The overall net reduction in dissolved inorganic nitrogen loads to the Lake from surface runoff, groundwater, and atmospheric sources would be 25 percent, as recommended.

Air Quality. One public comment said that the proposed ozone threshold of 0.08 ppm was clearly unattainable. However, it is being attained today. In the Basin, only the carbon monoxide and visibility thresholds are currently exceeded. Throughout the development of the 1982 Air Quality Plan for the Basin, no one has questioned the feasibility of attaining the federal 9 ppm carbon monoxide standard. The primary method of achieving the air quality thresholds is through reductions in automobile traffic and improvements in transportation systems.

Soil Conservation. Much public comment and debate have focused on the feasibility of the recommended thresholds for allowable soil loss. (See Table 6-10 of the Study Report.) It is staff's opinion that the recommended thresholds represent values slightly above natural values for the Basin and that they are attainable, over the long run, through application of Best Management Practices. Various policies of other land management agencies, studies of test plots, and laboratory experiments confirm the reasonableness of the recommended threshold.

It is important to note that the intent of the soil loss threshold is not to prohibit transient uses such as construction or logging, as long as these uses employ BMP's to keep temporary soil loss to a minimum. To achieve the staff recommendation on allowable soil loss, it may well be necessary to retrofit BMP's on existing development. This is also a viable means to help achieve the water quality thresholds.

Vegetation. Some public comment has questioned the feasibility of protecting the Tahoe Yellow Cress (*Rorippa subumbellata*). Staff notes that the threshold, worded in terms of "population sites," is already being achieved today. Most of the population sites are on public land, and all are in the wave runoff area, which is currently protected from most forms of development.

Costs of Implementing Thresholds

The purpose of this addendum, in discussing the costs of achieving the thresholds, is neither to determine the cost of the regional plan nor to expand the statements in the EIS. The purpose is to share with the public, statements that staff and the consultant team have already made on the record at various public sessions pertaining to the thresholds. The costs discussed here represent simply one possible scenario for attaining the air and water quality and other thresholds. The costs include direct capital and annual costs; they do not include opportunity costs.

Staff estimates that the total costs of meeting the recommended thresholds, through analysis of one possible scenario, are in the neighborhood of \$200 million in capital costs, or a corresponding annual cost of about \$30 million. This represents both private and public (federal, state, and local) investment. As the following table shows, the bulk of the expense in meeting recommended thresholds is in achieving the air quality and water quality thresholds. The costs of meeting other thresholds should be minor in comparison, either because they require little investment or because they are already embedded in the water quality and air quality estimates.

ESTIMATED COSTS: ALL THRESHOLDS (\$ MILLIONS)

	<u>CAPITAL</u>	<u>ANNUAL</u>
Air Quality*	9	1-3
Water Quality*	168-218	28-33
Soil Conservation*		
Vegetation*		
Noise*		
Wildlife		
Fisheries		
Recreation		
Scenic Resources		

LITTLE OR
NO ADDITIONAL
COST

* Mandated threshold components

** Includes capital costs annualized at 10 percent for 30 years.

Mitigation Issues

One public comment on the EIS said that where recommended thresholds are less stringent than existing local, state, or federal standards, it was necessary to discuss mitigation of environmental impacts. The only recommended threshold which is less stringent than an existing standard is the value for carbon monoxide concentrations of 9 ppm, as opposed to the States' standard of 6 ppm. The purpose of the CO threshold is to protect public health, rather than the environment at large. It is the judgment of the staff that its recommendation is adequate to protect public health (pending further justification by the States of the 6 ppm standard) and that no environmental mitigation measures are required at this time.

Mitigation of certain social and economic impacts will definitely have to be a part of the regional plan. Potential measures could include transfer of development rights, transfer of land coverage, redevelopment, land purchase including bonds and Santini-Burton acquisition, land exchange, and "pollution offset" programs. However, staff is unable to discuss mitigation measures in detail since the impacts will not be fully realized until the regional plan is developed.

3. Comment was received questioning the adequacy of the environmental impact statement because of the difficulty in assessing the various documents produced by the Agency, the inconsistencies between the documents, and a need to reduce proliferation by incorporating all into the environmental impact statement. This comment was expressed in part or in total by The Resources Agency of California, State Water Resources Control Board of California, Nevada Tahoe Conservation District, League to Save Lake Tahoe, and Tahoe-Sierra Preservation Council.

Staff and the consultant team realize there is indeed a proliferation of documents, working papers, and various verbal presentations produced over the past couple of months. It simply is a matter of work process and state-of-the-art progress in establishing environmental threshold carrying capacities. Each has a major role in the process. The environmental impact statement is a disclosure document describing the environmental consequences of adopting environmental thresholds. The draft study report documents the data and process used in development of staff and consultant team recommendations. Other reports and briefings have been used periodically to clarify and discuss the two documents.

In determining adequacy, the EIS should be the only document reviewed, for it must, and we feel it does, contain adequate environmental disclosure for establishing thresholds. However, public comment upon the Study need not be and was not limited to the EIS and its adequacy. Individuals commented on all phases of the study, recommended specific threshold levels, and expressed opinions on what should and should not be included.

Inconsistencies between documents is a result of updating staff and consultant team recommendations. Revision has occurred up to the time of the final Board meeting set to adopt thresholds. The important point is that the ultimate set of recommended thresholds be within the range of alternatives described and evaluated in the environmental impact statement.

The study report and other documents developed need not be incorporated in the EIS. The EIS is only one tool to be utilized by the Governing Board in the

decision making process. The decision must also be based upon the study report, numerous staff/consultant team briefings, and input provided by the public during the past eight months.

4. Comment on the adequacy of the EIS identified that interrelationships between thresholds had not been given adequate consideration. Achievement of one threshold could possibly negate another, duplication could be eliminated if the relationship was established, and evaluation of consequences is enhanced with discussion of threshold interrelationships. Similar comments were received from the Western Federal Regional Council, Tahoe Resource Conservation District, and League to Save Lake Tahoe.

The interrelationship between thresholds is best established with various land use alternatives such as will be developed during the regional planning process. At that time, various and feasible schemes will be developed to show attainment of not only one but all adopted thresholds. This action verifies the concept that attainment of one threshold will not negate another. Staff and the consultant team have further attempted to eliminate duplication of thresholds and provide an overall evaluation of the consequences involved in adopting thresholds. As pointed out in responding to other comments, the consequences are, of necessity, rather general in description until such time as a land use plan is developed.

5. Comment was received from the Northern California/Nevada Regional Conservation Committee of the Sierra Club that the EIS is an exemplary document that sets goals the public wants to see for the future Lake Tahoe. In addition, the Resources Agency of California and State Water Resources Control Board of California feel the document is adequate for adoption of most environmental thresholds.

No response to this comment is necessary.

6. Comment was received from the Western Federal Regional Council stating a need to show a relationship between man and the natural environment. The comment further stated that although these interdependencies should be in the impact statement, they are uncertain at this time and therefore should be addressed in the Regional Plan.

Staff and the consultant team agree it would be ideal if all monetary and non-monetary costs the public may be facing to maintain environmental quality could be displayed in this environmental impact statement. Since the Compact has prescribed a two phase planning process and since that second phase is yet to be completed, the impacts are uncertain. We agree they will be addressed in the Regional Plan. The response to comment number 2 above on social and economic implications applies equally to this comment.

7. The Western Federal Regional Council also reiterated the need to insure flexibility in the total planning process if, in developing more precisely the cause-effect relationships in the regional plan, attainability of the thresholds becomes questionable. A simplified chart to indicate role and interrelationships was provided by the WFRRC.

There is concurrence with the need to maintain a degree of flexibility based upon achieving the purposes and policies of the Tahoe Regional Planning Compact.