

20 OTHER CEQA AND TRPA-MANDATED SECTIONS

20.1 GROWTH-INDUCING IMPACTS

20.1.1 Tahoe Regional Planning Agency

Section 3.7.2(H) of the TRPA Code of Ordinances requires that an EIS evaluate the growth-inducing impacts of a proposed project. Growth can be induced by eliminating obstacles to growth or by stimulating economic activity in a way that encourages increases in population and housing in the region.

20.1.2 California Environmental Quality Act

CEQA Section 21000(b)(5) specifies that growth-inducing impacts of a project must be addressed in an EIR. Section 15126(d) of the CEQA Guidelines states that a proposed project is growth-inducing if it could “foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Included in the definition are projects that would remove obstacles to population growth. Examples of growth-inducing actions include developing water, wastewater, fire, or other types of services in previously unserved areas; extending transportation routes into previously undeveloped areas; and establishing major new employment opportunities.

Typically, the growth-inducing potential of a proposed project would be considered significant if it fosters growth or a concentration of population above what is assumed in local and regional land use plans, or in projections made by regional planning authorities. Significant growth impacts could also occur if the project provides infrastructure or service capacity to accommodate growth levels beyond those permitted by local or regional plans and policies. These impacts could result from projects that include housing construction or the removal of an obstacle to growth, such as expansion of a wastewater treatment plant, extending transportation routes into previously undeveloped areas; and establishing major new employment opportunities.

20.1.3 Growth-Inducing Impacts

Development in the Tahoe region is guided by the Regional Plan, which allows new development and redevelopment through authorization of residential allocations, residential bonus units, commercial floor area, and tourist accommodation units. As a result, development in the region is capped and implementation of projects in accordance with the Area Plan would not result in an increase in total planned development. Local variation in population growth and economic activity would vary somewhat depending on the alternative selected, but modest growth in the project area is generally expected to occur in accordance with the Regional Plan.

The Area Plan incorporates Regional Plan policies, which encourage the development and redevelopment of Town Center properties through restoration and retirement of parcels outside the urban area—most particularly, sensitive lands—and transfer of development rights into Town Centers. Environmentally beneficial redevelopment resulting from these policies would be concentrated in the Town Centers, and environmental restoration on parcels outside of urban centers would be incentivized.

Population growth under all alternatives would vary minimally. Section 6.4 contains a description of the population growth that can be expected between 2014 and 2035 under each alternative. The difference in

population growth between the lowest-growth alternative (Alternative 4), and the highest-growth alternatives (Alternatives 1 and 2) is 48 persons, or roughly 0.4 percent of projected growth.

Development in the area would proceed in accordance with the Area Plan and Regional Plan and would be limited by available residential allocations, CFA, coverage, TAUs, land use designations and zoning, sensitive resources, and infrastructure constraints. Though modest, growth allowed by the Area Plan could require additional water, sewer, and wastewater facilities; fire protection services; and other infrastructure and public services. Area Plan policies direct development to those areas that are suitable for development, including having infrastructure capacity, and allow the upgrading and expansion of public services and facilities to support existing and new development consistent with the Regional Plan.

The Tahoe City Lodge project would redevelop the project site from existing commercial uses to a 118-unit hotel, visitor amenities, a reconstructed clubhouse at the Tahoe City Golf Course, SEZ restoration and other minor improvements. Among other things, the project objectives are to develop high-quality tourist accommodations, improve scenic quality, provide jobs, contribute to economic revitalization, and contribute to environmental improvement. Because the project would redevelop an existing property with visitor-serving uses, result in a net employment change of 29 full-time equivalent positions, and not result in any permanent housing, the project would not be growth inducing.

Finally, because the Placer County Tahoe Basin Area Plan would implement the goals and policies of the adopted Regional Plan in the area to which it applies, encourage environmentally beneficial development and redevelopment—such as the Tahoe City Lodge—in accordance with the Regional Plan, and allow modest growth that is ultimately capped by the marketable rights program of the TRPA, the Area Plan would not substantially affect the level of growth in the Plan area, and would not be considered growth inducing.

20.2 RELATIONSHIP BETWEEN THE SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Chapter 3 of TRPA's Code of Ordinances (Section 3.7.2.F) requires a discussion of the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity. This requirement recognizes that short-term uses and long-term productivity are linked, and the opportunities acted upon in the near term have corollary opportunity costs in relation to foregone options and productivity that could have continuing effects well into the future. The following discussion addresses how the Area Plan would affect the short-term use and the long-term productivity of the environment. In general, "short-term" is used here to refer to the construction period of projects included in the Area Plan, while "long-term" refers to the operational life projects included in the Area Plan.

This EIR/EIS assesses the effects of proposed policy directions for the Placer County portion of the Lake Tahoe Basin, the effects of a mixed-use design concept, and the effects of a proposed project that demonstrates the practical application of such policies. As such, the analysis focuses primarily on the potential effects of policies with some attention to a specific project. However, the Area Plan will be implemented, over its planning horizon, through as-yet-undefined projects that will be accompanied by site-specific project review and environmental documentation following approval of the Area Plan. Those projects will result in the short-term use of the environment, with implications for the maintenance and enhancement of long-term productivity.

New residential, commercial, tourist, and recreational development projects could involve the use of raw land, including grading, clearing, and construction. Once committed to new development, it is unlikely that the land would be returned to a natural state in the near term. Effects on soils, habitat, and land uses from new development would be considered permanent. New residential development would be limited by remaining development rights and by the number of allocations available to Placer County, CFA would be limited by the remaining pool, and TAUs would be limited by potential transfers, and potential conversion of CFA.

As was directed in the Bi-State Planning Compact, TRPA established standards (threshold standards) that define and protect the significant scenic, recreational, educational, scientific, and natural values of the region. Through adoption of the Area Plan, Placer County and TPRA are implementing a comprehensive set of policies and implementation plan that work together to incentivize development in appropriate areas; remove development from, and restore, sensitive lands; and contribute to environmental improvement and threshold attainment. The threshold standards and system of required findings evaluates the maintenance of long-term productivity as a function of the ability of the region to attain and maintain the nine threshold standards. This EIR/EIS describes construction-related impacts (short-term use). In order for the project to be permitted by TRPA, the current status of threshold standard attainment, existing impacts, and potential impacts on threshold standards (long-term productivity) must be evaluated and found to be consistent through the TRPA threshold findings process. Therefore, the short-term uses of the environment created by the proposed project would not adversely affect the long-term productivity of the Plan area or region.

20.3 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES AND SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

A commitment of resources is irreversible and irretrievable when the use or consumption of such resources is neither renewable nor recoverable for use in the future. Chapter 3 of the TRPA Code of Ordinances (Section 3.7.2.G) and Section 15126.2 of the CEQA Guidelines require a discussion of such resources. The commitment of resources refers to the use of nonrenewable resources such as fossil fuels, water, and electricity, and also to changes to land use which would commit future generations to similar uses. Development, redevelopment, and restoration activities that could occur under the proposed Area Plan would result in the irreversible and irretrievable commitment of energy and material resources during construction and operation of specific projects.

Uses of nonrenewable resources during the development that is expected to occur in the region over the life of the Area Plan may be irreversible since a commitment of such resources makes removal or nonuse thereafter unlikely. Implementation of the Area Plan would result in permanent changes to the existing environment, which has been described throughout this EIR/EIS. While the Area Plan focuses development into existing urban areas, there could still be some conversion of undeveloped land to urbanized uses under various development proposals. Development would result in the irreversible consumption of nonrenewable resources and would have an incremental and irreversible effect on such resources. The irreversible commitment of limited resources is inherent in any development project or projects. Resources anticipated to be irreversibly committed over the life of the project include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water. Development of any kind also represents a long-term commitment to the consumption of fossil fuels. These increased energy demands relate to construction, lighting, heating, and cooling, and general operation of all types of facilities.

20.4 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

Section 5.8.B (2) of the TRPA Code of Ordinances requires an EIS to include any significant adverse environmental effects which cannot be avoided should any of the alternatives be implemented. CEQA Section 21100(b)(2)(A) states that an EIR shall include a detailed statement setting forth “[i]n a separate section...[a]ny significant effect on the environment that cannot be avoided if the project is implemented.” State CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts, including those that can be mitigated but not reduced to a less-than-significant level.

All alternatives (including Alternative 4) would result in significant and unavoidable impacts related to air quality, greenhouse gas emissions (GHG), and traffic. Construction resulting from any alternative would result in short-term ROG, NO_x, PM₁₀ and PM_{2.5} emissions that cannot be fully mitigated and would have a

significant and unavoidable impact. This is consistent with the air quality analysis included in the RPU EIS. All long-term or other air quality impacts would be less-than-significant or would be mitigated to a less-than-significant level. Similarly, GHG emissions resulting from construction activities could be substantial over the build-out period of the Area Plan and Regional Plan. The construction related GHG emissions would be greater than the potential reduction in GHG emissions created by the redevelopment land use patterns prescribed by the four alternatives, and would result in a significant impact that cannot be sufficiently mitigated. This finding is consistent with the RPU EIS analysis for GHGs. Finally, roadway and intersection traffic congestion would increase for all alternatives on SR 28 in Tahoe City east of the Wye and at the SR 28/Grove Street intersection. Although all alternatives would create a significant and unavoidable impact, the projected increase in vehicle congestion would be less for Alternatives 1, 2, and 3 than it would be for Alternative 4. Therefore, although the action alternatives are environmental superior to Alternative 4, the potential environmental effects or benefits that would result from implementation of Alternatives 1, 2, and 3 are roughly equivalent.

20.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE/ENVIRONMENTAL PREFERABLE ALTERNATIVE

The California Environmental Quality Act (CEQA) Guidelines require an EIR to discuss whether an environmentally superior alternative is apparent from the analysis. Often, alternatives have environmental advantages and disadvantages, but no clearly superior alternative becomes evident, because the relative importance of environmental impacts varies based on their different priorities and/or sensitivities.

Section 15126.6 of the State CEQA Guidelines states that “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” The Draft EIR/EIS presents a detailed evaluation of the environmental impacts of each alternative. Based on that evaluation, the following discussion provides a summary of the key environmental advantages and disadvantages of the alternatives and whether any alternative emerges as a clear, environmentally superior alternative.

Table 20-1 identifies the number of potentially significant, significant, significant and unavoidable, and beneficial impacts identified under each action alternative for each environmental issue area evaluated in this EIR/EIS. The significance of impacts after mitigation is also identified. As shown in Table 20-1, based solely on impact significance conclusions after implementation of mitigation measures, the Area Plan element of Alternatives 1, 2, and 3 would result in five significant and unavoidable impacts related to traffic and greenhouse gas emissions, and Alternative 4 (the no action alternative) would result in these same significant and unavoidable impacts, plus an additional five impacts for which mitigation cannot be enforced, for a total of ten significant and unavoidable impacts. All action alternatives would result in five beneficial effects, with one beneficial effect for Area Plan Alternative 4. The Lodge portion of Alternatives 1 and 3 would result in two significant and unavoidable impacts related to traffic. Because Alternative 2 would marginally reduce site-generated trips, this alternative would result in modest beneficial impacts related to intersection and roadway LOS. Lodge Alternative 4 would result in the same traffic-related significant and unavoidable impacts as Lodge Alternatives 1 and 3, plus three additional impacts for which mitigation cannot be enforced, for a total of five significant and unavoidable impacts.

Environmental impact conclusions indicate that Area Plan Alternatives 1, 2, and 3 would have roughly equal environmental effects, and each would provide more environmental benefit than Alternative 4. Although the comparison of the Lodge Alternatives indicates that Alternative 2 would have fewer significant and unavoidable impacts, the margin between the beneficial traffic impacts shown for Alternative 2 and the significant and unavoidable traffic impacts shown for Alternatives 1 and 3 is minor. Additionally, Alternatives 1 and 3 would result in environmental benefits that are not indicated by the impact conclusions, such as restoration of SEZ areas, preservation of open space, and environmental enhancement requirements for development within special planning areas. Therefore, although the action alternatives are environmentally superior to Alternative 4, the potential environmental effects or benefits that would result from implementation of Alternatives 1, 2, and 3 are roughly equivalent.

Table 20-1 Summary of Significant Impacts Before and After Mitigation

Environmental Topic	Project-Level/ Cumulative	Area Plan								Tahoe City Lodge							
		Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 1		Alternative 2		Alternative 3		Alternative 4	
		Before	After	Before	After	Before	After	Before	After ¹	Before	After	Before	After	Before	After	Before	After ¹
Air Quality	Project	2S	0	2S	0	2S	0	2S	2SU	1S	0	0	0	1S	0	0	0
Biological Resources	Project	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cultural and Historic Resources	Project	0	0	0	0	0	0	0	0	2PS	0	2PS	0	2PS	0	0	0
Geology, Soils, Land Capability, and Coverage	Project	0	0	0	0	0	0	0	0	3PS	0	2PS	0	3PS	0	0	0
Greenhouse Gas Emissions and Climate Change	Project	1PS	1SU	1PS	1SU	1PS	1SU	1PS	1SU	0	0	0	0	0	0	0	0
Hydrology and Water Quality	Project	1B	1B	1B	1B	0	0	0	0	3PS	0	3PS	0	3PS	0	0	0
Hazards, Hazardous Materials, and Risk of Upset	Project	0	0	0	0	0	0	0	0	2PS	0	2PS	0	2PS	0	0	0
Land Use	Project	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Noise and Vibration	Project	0	0	0	0	0	0	0	0	2S	0	1S	0	2S	0	1S	1SU
Population and Housing	Project	1B	1B	1B	1B	1B	1B	0	0	0	0	0	0	0	0	0	0
Public Services and Utilities	Project	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Recreation	Project	1B	1B	1B	1B	1B	1B	1B	1B	0	0	0	0	0	0	0	0
Scenic Resources	Project	1PS 1B	1B	1B	1B	1PS 1B	1B	0	0	0	0	0	0	0	0	0	0
Transportation and Circulation	Project	1PS 2S 2B	2SU 2S 2B	1PS 2S 1B	2SU 1B	1PS 2S 2B	2SU 2B	1PS 2S	3SU	1S	1SU	1S 4B	4B	1S	1SU	2S	2SU
	Cumulative	3S	2SU	3S	2SU	3S	2SU	4S	4SU	1S	1SU	1S	1SU	1S	1SU	2S	2SU
Total	Project + Cumulative	3PS 7S 6B	5SU 7S 6B	2PS 7S 5B	5SU 5B	3PS 7S 5B	5SU 5B	2PS 8S 1B	10SU 1B	10PS 5S	2SU	9PS 3S 4B	1SU 4B	10PS 5S	2SU	5S	5SU

Note: PS = Potentially Significant Impact, S = Significant Impact, B = Beneficial Impact, 0 = No Significant Impacts; SU = Significant and Unavoidable Impact

¹ There is no mechanism for enforcement of mitigation measures for the no-action alternatives, therefore the potential impacts identified remain unmitigated. Impacts shows as Significant and Unavoidable for Alternative 4 were indicated as such by the environmental analysis for that specific impact.

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