

# Tahoe South Events Center Environmental Assessment

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## Scoping Summary Report

### Introduction

The Tahoe Regional Planning Agency (TRPA) and Douglas County Visitors Authority (DCVA) sought public comment on the scope of the Environmental Assessment (EA) for the proposed Tahoe South Events Center project between January 5, 2018 and February 5, 2018.

Except for planning matters, ordinary administrative and operational functions of TRPA, or exempt classes of projects, TRPA uses either an initial environmental checklist (IEC) or environmental assessment to determine whether an environmental impact statement will be prepared for a project or other matter. When TRPA determines the IEC will not provide sufficient information to make the findings in TRPA Code of Ordinances subsection 3.3.2, TRPA requires the preparation of an environmental assessment in lieu of an initial environmental checklist.

An Environmental Assessment (EA) will be prepared and circulated for 14 days, during which time the public may comment on the document, prior to a decision being made by the TRPA Governing Board on the project. These comments will be documented, and responses will be provided in the Governing Board Staff Report for the decision meeting. The EA will contain the following elements:

- A. A brief discussion of the need for the project;
- B. Alternatives to the proposed project;
- C. A discussion of the environmental impacts of the proposed project and the alternatives;
- D. A discussion of proposed mitigation for significant adverse effects, if any;
- E. A list of agencies and persons consulted.

Based on the information contained in the environmental assessment and other information known to TRPA, TRPA will make one of the findings listed under Code subsection 3.3.2 and take the action prescribed in the applicable finding. TRPA makes environmental assessments available for public review not less than five working days before TRPA intends to take action on the project.

The TRPA Governing Board will decide:

1. Whether or not to implement the project activities as described in the Proposed Action; and
2. Whether or not a Finding of No Significant Effect can be supported by the environmental analysis contained in the EA; or
3. If a project or matter may have a significant effect on the environment, TRPA will cause an EIS to be prepared in accordance with its Rules of Procedure, Code Chapter 3, and Compact.

If TRPA finds that the project will not have a significant effect, no further environmental documentation will be required. If TRPA finds the project will not have a significant effect if certain mitigation measures are incorporated into and made a part of the project, the project description will be correspondingly modified, and no further environmental documentation will be required.

The following specific findings will be made, pursuant to Articles V(c), V(g) and VI(b) of the Compact, in addition to any other findings required by the TRPA Code of Ordinances (4.4.1. Findings Necessary to Approve Any Project). To approve any project TRPA shall make the following findings, in accordance with Sections 4.2 and 4.3, that:

- A. The project is consistent with and will not adversely affect implementation of the Regional Plan, including all applicable Goals and Policies, plan area statements and maps, the Code, and other TRPA plans and programs;
- B. The project will not cause the environmental threshold carrying capacities to be exceeded; and
- C. Wherever federal, state, or local air and water quality standards apply for the region, the strictest standards shall be attained, maintained, or exceeded pursuant to Article V(d) of the Tahoe Regional Planning Compact.

Public Scoping was noticed in the Tahoe Daily Tribune and on the TRPA website on January 5, 2018. The public scoping notice was distributed to stakeholders and interested parties, requesting written and electronic comments on the proposed project by February 5, 2018. Eleven (11) comment letters were received including comments from the Nevada State Historic Preservation Office and the League to Save Lake Tahoe. In response to the request for public comment on the scope of the EA, formal input was received from the following organizations and individuals on the dates indicated in the list below.

<b>Name</b>	<b>Date</b>
Steven Hartman	January 5, 2018
Dondra Biller	January 6, 2018
Gary Pierce	January 6, 2018
Ralph and Terri Thomas	January 7, 2018
Leonard Soares	January 8, 2018
Bill Downey	January 8, 2018
Jennifer Quashnick	January 9, 2018
Taylor Currier	January 9, 2018
Nevada State Historic Preservation Office – Rebecca Lynn Palmer	January 22, 2018
John Jay	February 4, 2018
League to Save Lake Tahoe – Marissa C. Fox, Esq.	February 5, 2018

## Summary of Comments

Comments received are categorized based on their relevance to the project and organized according to comment focus area. Comments were grouped into the following groups: support for the proposed action (or certain components of the proposed action); project description clarifications; consideration of design features; purpose and need and project objectives; potential resource impacts; NEPA and TRPA requirements, and suggestions for alternatives.

### ***Support for the Proposed Action***

“First I am GREATLY IN FAVOR of this type of facility being built, increasing the type of business activity and draw to the Tahoe area” (Steven Hartman)

"I do think that having new events infrastructure is perhaps a good idea for our town in the long run, but I want to make sure those in charge are considering traffic flow, parking, and the locals and our lives when designing the entire thing. Especially since this will be publicly-owned." (Dondra Biller)

"Coming from Eagle County/Vail years ago; the town there tried for years to build a center such as this with no success. It was badly needed and excluded the town from many meeting and conventions due to the lack of a facility. I believe this is the right project in the right place." (Ralph and Terri Thomas)

**TRPA Response: Thank you for your involvement in the public scoping process. We look forward to continuing to work with citizens and agencies during the review of this project.**

### ***Project Area and Project Description Clarifications***

"Quick questions - the notice re: the Events Center at Stateline states that the project area includes undeveloped land owned by Edgewood (I presume the Resort Recreation parcels), but there is no map showing the entire project area (with these parcels). Can you please provide this? Also, are these parcels being included in the project area for coverage/commodity reasons/etc., or will something be proposed on the Edgewood Mountain parcel as well?" (Jennifer Quashnick)

"Please contact me via Email -I have information on past projects in the South Lake Tahoe area and would like to disclose some of these problems." (Gary Pierce)

"I recently learned of the planned development @ Stateline. I strongly feel that this solely represents another avenue to increase state, county, and federal revenues @ the expense of a beautiful irreplaceable meadow and the wildlife it supports. This is contrary to what all of the residents I've spoken with want..... We all moved here to escape urban sprawl and traffic. As you know, traffic is already a nightmare during the summer months and this project will most certainly exacerbate this issue along with the other ridiculous changes proposed in traffic flow (I'm sure consultants have been paid to suggest otherwise). It does make me wonder if the planners of these projects have any common sense whatsoever and it is certainly obvious that they could care less about the quality of life of we who live here. Those involved in this project are not doing this in the public's interest but for their own financial benefit while squandering our hard earned tax dollars. Interestingly, none of the county commissioners live @ the lake..... this wouldn't be allowed in the back yard. Please reconsider not supporting this project. I hope that you're doing well and are in good health and spirit." (Bill Downey)

"I am writing to voice my opinion about the proposed TVDA event center. I am writing as a public citizen with no affiliation to the project or regulatory agency. I am concerned about the undeveloped parcel owned by Edgewood Companies. This parcel is some of the last remaining open space in the Stateline area and contains historic resources like the Pony Express Trail. It is my opinion that this parcel should not be developed. If the TVDA intends to develop this parcel, then I am advocating for development that works with the existing meadow/landscape. The undeveloped parcel should not include buildings and parking lots. Instead, it should focus on community oriented growth like pedestrian pathways and outdoor gathering space. Please take this into consideration when reviewing the proposed project. Thank you for your time." (Taylor Currier)

**TRPA Response: Thank you for your involvement in the public scoping process. We look forward to continuing to work with citizens and agencies during the review of this project. The project area is located entirely on the MontBleu parcel and the location of the proposed Event Center is currently developed with a paved parking lot. The project is not located on what is sometimes referred to as the "Edgewood Mountain Parcel" which is an undeveloped parcel located to the east of the project area.**

## ***Consideration of Design Features and Mitigation Measures***

“TRPA must consider appropriate transit mitigation measures in connection with the Project. To address increased VMT associated with recent land use and development projects, TRPA repeatedly relies on payment into TRPA’s air quality mitigation fund and compliance with TRPA Code section 50.4.3. The League has repeatedly detailed the ineffectiveness of these measures as proper mitigation for impacts to traffic and the VMT threshold standard, and in the interest of brevity, will decline to repeat those concerns here. However, TRPA may not properly rely on these mitigation measures to make any required findings under NEPA.

TRPA recognizes that transit and transportation are important priorities for the Basin. Here, however, and despite claims that the Project gives special attention to transit, the only improvements proposed on connections with this Project area are a bus pull-off on highway 50 and new transit shelters. Transit shoulders and shelters are of little utility without effective transit. Given the increased burdens on the region’s roads and infrastructure, the potential exceedance of the VMT threshold, and the capacity of the Project, the Project should at the very least, consider the implementation of a frequent and reliable transit shuttle service within the Project Area and greater tourist core, or substantial and ongoing contributions to transit as a mitigation. “ (League to Save Lake Tahoe)

“Traffic movement - we all know that traffic has gotten horrible in South Tahoe the last few years, so we want to make sure that traffic movement down at the casinos and on Lake Parkway is being taken into consideration. Though the potential future of any Loop Road is yet to be determined, we hope that any proposed alternative routing to roads in that area is being considered with the plan for the events center. Please don’t make locals have to go through the casino corridor with all of the tourists! Even during any construction phase.” (Dondra Biller)

“Parking - The proposed plan obviously takes up a ton of the parking at Montbleu. Where are folks going to park during the busy holiday weekends? Please consider having additional parking for each space that you remove for the events center, either as an underground garage or perhaps by adding levels to the already existing Montbleu garage.” (Dondra Biller)

“I know TRPA doesn’t really have power over this comment, but please do what you can to make sure that our town doesn’t turn into Snowglobe every weekend with this new events center. We do not have the infrastructure to handle that many additional people and all you will end up doing is making locals mad and resentful for living here. With all of the other drama unfolding for VHRs and weekend traffic, the locals really need a win. We also want to be able to attract new people to live up here and set down roots in the community. Having a Snowglobe-like experience every single weekend will not make that happen. We can tolerate it once a year, especially since New Years is already so busy up here, but not all of the time.” (Dondra Biller)

“Second, however, as I read the proposal, it calls for eliminating 468 existing parking places, even while it has the capacity to seat 6000 in the event area. As someone who has struggled to find parking in the Stateline/Heavenly/Raleys/Harrahs/MontBleu area, I don't find this tenable. My input, therefore, is that the facility should be built, but that additional parking, likely in the form of a parking structure, should be part of the proposal.” (Steven Hartman)

**TRPA Response: Thank you for your involvement in the public scoping process. We look forward to continuing to work with citizens and agencies during the review of this project. TRPA is requiring preparation of an EA due to potentially significant effects to transportation/transit, traffic, parking and circulation that may result from the proposed project. The public comments on these topics will inform the environmental analysis and development of the associated alternatives.**

## **Purpose and Need and Project Objectives**

“1) Topic of discussion: Existing Condition; Reference: 1a) Douglas County Code, Section 3.70.110 - Need and Use of Funds. The description of the existing condition from the scoping notice is repeated verbatim below. The text in italicized and underlined larger font are the topics of discussion.

EXISTING CONDITION: *The South Shore of Lake Tahoe currently lacks a year-round venue necessary to attract conventions, trade shows, special events and entertainment. The need for such a facility **was reconfirmed** by the Douglas County Board of County Commissioners on February 16, 2017 when they authorized Ordinance 2017- 1480 amending Douglas County Code, Title 3, Chapter 3.70 – Transient Lodging License Tax, Sections 3.70.020, 3.70.030, 3.70.070, **3.70.110**, and 3.70.120, to impose an additional 1 percent Transient Lodging License Tax...*

1a) Comment: The terms *necessary* and *was reconfirmed* are incorrect and misleading. The basis for these two terms appear to be derived from Reference (a). That section is reproduced verbatim in 1(c), with relevant clauses in italicized, larger font.

Section 3.70.110 addresses the need to strengthen the economic health of Douglas County and its townships through promotion and development of tourism and economic redevelopment. Revenue generated by the transient occupancy tax is designated for studies and actual development toward this goal. This goal is very broad and non-restrictive. True, the South Shore of Lake Tahoe currently lacks a year-round venue, but the Douglas County Board of County Commissioners have not concluded within the referenced Douglas County Codes that such a venue is necessary. The commissioners only state, “All funds collected will be used to increase and support special events and tourism related venues...” The proposed South Shore Events Center is within the scope of the code, but has not been identified as the singular solution. The narrative of the scoping document steers the dialog down one path and implies that alternative proposals, such as other than an events center or even an events center at a different site, have already been considered, dismissed and are no longer under consideration. If the narrative is appropriate, identify the proper references, otherwise clarify that alternatives are open for consideration.

1b) Proposed Resolution: Revise the text to correctly identify the assessment determining the need for a South Shore Events Center. In the absence of such an assessment, revise the description along the lines of that below. The larger font text highlights deletions and insertions.

EXISTING CONDITION: The South Shore of Lake Tahoe currently lacks a year-round venue ~~necessary~~ to attract conventions, trade shows, special events and entertainment. ~~The need for s~~ Such a facility ~~was reconfirmed will support the promotion of tourism and economic development within the Lake Tahoe Township.~~ **by** ~~the~~ The Douglas County Board of County Commissioners **authorized this activity** on February 16, 2017 when they authorized Ordinance 2017- 1480 amending Douglas County Code, Title 3, Chapter 3.70 – Transient Lodging License Tax, Sections 3.70.020, 3.70.030, 3.70.070, 3.70.110, and 3.70.120, to impose an additional 1 percent ....

1c) Reference (a) - 3.70.110 Need for and Use of Funds. The revenue generated hereby will help offset the loss of room tax revenues experienced since the year 2000, benefit Douglas County’s Park and Recreation Department, and **strengthen the economic health of Douglas County by the promotion of tourism and economic redevelopment. The Board of County Commissioners shall use the proceeds as follows:**

A. Of the three percent (3%) transient lodging license tax, one percent (1%) will be used for the benefit of Douglas County. **The revenue received will be used to fund the County’s economic vitality efforts** and to repair, replace, improve, acquire and protect Douglas County’s parks, recreation assets and facility reserves adequate to operate safe and functioning parks and recreation facilities and equipment.

B. Of the three percent (3%) transient lodging license tax, the remaining two percent (2%) ***will be used to strengthen the economic health of Douglas County, both in the Carson Valley and the Lake Tahoe Township, by promoting tourism.*** Funds collected within the Lake Tahoe Township portion of Douglas County will stay for use in the Lake Tahoe Township and be paid to the Tahoe Douglas Visitors Authority. Funds collected in the East Fork Township will stay for use in the East Fork Township and be paid to the Carson Valley Visitors Authority. ***All funds collected will be used to increase and support special events and tourism related venues, participate in research,*** marketing and advertising, support technology driven enhancements ***in order to grow the tourism economy in Douglas County.***

C. Of the additional one percent (1%) transient lodging license tax imposed on all transient lodging businesses within the Lake Tahoe Township beginning on July 1, 2017, all of the revenue received shall be accounted for separately by Douglas County, and paid to the Tahoe Douglas Visitors Authority. The Tahoe Douglas Visitors Authority shall account for this revenue separately, and the revenue shall be used by the Tahoe Douglas Visitors Authority solely for the purpose of studying the feasibility of, planning for, operating, and/or funding economic redevelopment projects within the Lake Tahoe Township. (Ord. 1480, 2017; Ord. 1317, 2010)" (John Jay)

"2) Topic of discussion: Desired Condition. References: 2a) Tahoe Regional Planning Agency Regional Plan adopted June 06, 2016, Chapter 2, Land Use Element, Policy LU (Land Use) - 1.1; 2b) Douglas County, Nevada, South Shore Area Plan, adopted by TRPA on September 25, 2013, Section on Phase I: South Shore Area Plan, sub-section High Density Tourist District; 2d) Douglas County, Nevada, Master Plan Drafted October 2014 (and awaiting TRPA approval), Section on Phase I: South Shore Area Plan, sub-section High Density Tourist District. The description of the desired condition is repeated verbatim below from the scoping notice. The text in italicized, larger font is the topic of discussion.

**DESIRED CONDITION: *The desired condition is a high-quality public assembly and entertainment venue for residents and visitors to the south shore of Lake Tahoe.*** There is also a desire to reinvent the built environment...

2a) Comments: The desire for a high-quality venue is inconsistent with the approved objectives stated in each of References (2a) through (2c). An extract from Reference 2(a) is repeated below:

THE PRIMARY FUNCTION OF THE REGION SHALL BE AS A MOUNTAIN RECREATION AREA WITH OUTSTANDING SCENIC AND NATURAL VALUES. From References 2(b) and 2(c), addressing the area bounded by the Casino Core Area and the lower Kingsbury area, and therefore applicable to the proposed events center, the plans state, The objective is to transform the area into a world class recreational tourist destination, which will include... All redevelopment projects in the High Density Tourist District will be evaluated to ensure consistency with these overall objectives.

2b) Proposed Resolution - As approved and slightly restated from above, all redevelopment projects in the High Density Tourist District shall be evaluated to ensure consistency with the overall objectives. TRPA and Douglas County should review the proposed events center for compliance with its own established objectives. It is not apparent how a public assembly area and entertainment venue qualifies as a world class recreation destination while showcasing the beauty that is Lake Tahoe. The plans for the events center should either be abandoned for non-compliance, or the regional plans and South Shore plans should be modified to support the creation of an events center." (John Jay)

**TRPA Response: Thank you for your involvement in the public scoping process. We look forward to continuing to work with citizens and agencies during the review of this project. The purpose and need for the project and the project objectives will be clarified to address the public comment concerning these topics.**

## **Potential Resource Impacts**

“In order to determine the archaeological sensitivity of the project area, the SHPO consulted the Nevada Cultural Resources Inventory System (NVCRIS). According to these records, the area has not been inventoried for archaeological resources and there are no recorded cultural resources in the project area. However, archaeological resources are documented in proximity to the project area. Furthermore, the extent of existing ground disturbance below the parking lot and existing facilities is unknown and could contain subsurface archaeological deposits. It would be helpful if a Secretary of the Interior-qualified archaeologist were present for any ground disturbance. The SHPO recommends consulting with Darrel Cruz, THPO of the Washoe Tribe of Nevada and California. He can be reached at [darrel.cruz@washoetribe.us](mailto:darrel.cruz@washoetribe.us).” (Nevada State Historic Preservation Office)

“TRPA’s vehicle miles traveled (“VMT”) threshold standard mandates “a 10% reduction from 1981 base year estimated VMT” of 2,030,938. The most recent estimate of annual VMT provided by TRPA in the 2015 Threshold Evaluation Report is 1,937,070 (the “VMT Estimate”). The VMT Estimate based on 2014 traffic counts brings the region within five (5) percent of TRPA’s adopted threshold standard. This means that, as of 2014, an increase in VMT of only five percent would result in exceedance of TRPA’s adopted threshold and a dereliction of its responsibility under the Compact.

The VMT Estimate does not include additional VMT contributed by other land use and development projects currently under consideration. For example, the U.S. 50/South Shore Community Revitalization Project (the “Highway 50 Project”) would contribute to a cumulatively significant impact to the VMT threshold before consideration of mitigation. Similarly, the full build-out of the Meyers Area Plan would potentially generate 1,180 additional daily vehicle trips on average and an additional 89 peak hour trips. The 2012 Regional Transportation Plan acknowledges this growth, noting that the regional VMT is forecast to rise in the future and eclipse the threshold value. Further, the number of visitors to the regional necessarily impacts TRPA’s transportation model outputs, including VMT.

Despite this, and despite the fact that more recent and precise traffic counts are available, TRPA has provided no updated data or revised the VMT Estimate to accurately reflect current conditions. It is therefore difficult to understand how TRPA intends to make any findings that a 6,000-seat venue capable of accommodating 150,000 visitors per year will not result in any significant impacts to the region or to the VMT standard. Accordingly, the League requests a full and complete analysis of existing conditions and an estimate of VMT based on current data in connections with any such findings. Such evaluation must include a complete and accurate description of the corresponding increase in VMT resulting from the Project.” (League to Save Lake Tahoe)

“Conclusion. The League supports environmentally positive redevelopment projects. However, we are skeptical that an entertainment venue projected to host over 150,000 people per year will have no significant impact on the south shore’s traffic and circulation system or on TRPA’s VMT threshold standard. Therefore, to the extent TRPA intends to make such findings, TRPA must provide full and complete analysis of existing conditions and VMT in the Basin based on current data, as well as an accurate description of the corresponding increase in VMT resulting from the Project. The Project should also incorporate significant improvements to transit, including reliable shuttle service, to make required findings under NEPA.” (League to Save Lake Tahoe)

‘5) Topic of Discussion: Circulation. References: 5a) US 50 / South Shore Community Revitalization Project, April 2017.

5a) Comment: The section addresses how the design of the events center will accommodate circulation, regardless of the level of service, rather than actual circulatory flow itself. That is, regardless of whether the level of service (LOS) for traffic flow is A, B, C, D or E (unacceptable), the section describes how the events center will work with it. Should the traffic draw from the events center degrade the LOS from A to B, or B to D or other, this impact is not addressed. As

an example, In Reference (a), Section 3.6 - Traffic, the report states that infrastructure and building developments through 2020 have been considered, and whatever the outcome, the outcome of the US 50 Loop Project will support additional development through 2040, at which time traffic patterns and needs will be assessed. It is not known if the analysis includes the traffic impact that will result from the luxury gated community, Gondola Vista, on Lake Parkway at the intersection of Park/Heavenly Village Way. The proposed events center, should it come to fruition, may result in full land development occurring sooner than the year 2040 timeframe anticipated in Reference (5a). The end result may be a degradation in vehicular level of service and quality of life sooner than anticipated in Reference (5a). Presently, US Highway 50 and Lake Parkway are two thoroughfares from west to east. Should the current US Highway 50 be reduced from four lanes to two lanes, Lake Parkway will become the new US Highway 50 and be the single main west-to-east thoroughfare. The US 50 report has taken measures to maintain flow through such a route (e.g. - a bridge to access Van Sickle Bi-State Park). The introduction of the Gondola Vista community (and potentially vacation home rental traffic) and ingress/egress traffic to and from the proposed events center may potentially have a negative impact on future traffic patterns and assumptions, and may even present an argument against the US Highway 50 Loop Project/ Alternative D.

5b) Proposed Resolution: Perform preliminary traffic flow assessments with known planned and anticipated developments and Alternatives A through E of Reference (5a) to determine compliance with regional and area plans.” (John Jay)

**TRPA Response: Thank you for your involvement in the public scoping process. We look forward to continuing to work with citizens and agencies during the review of this project. TRPA is requiring preparation of an EA due to potentially significant effects to air quality, transportation/transit, traffic, parking and circulation that may result from the proposed project. Potential impacts to archaeological resources will also be evaluated in the EA. The public comments on these topics will inform the environmental analysis and development of the associated alternatives.**

### ***NEPA and TRPA Requirements***

“1. NEPA requires TRPA to accurately analyze the potential impact of the project on TRPA’s vehicle miles traveled threshold standard. An Environmental Assessment (“EA”) is intended to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a “finding of no significant impact” (“FONSI”). In evaluating the significance of a proposal for agency actions, the EA should focus on the context and intensity of effects that may significantly impact the quality of the human environment. Thus, in order to issue a FONSI TRPA must properly conclude that the Project will not “have a significant effect on the human environment. Here, it is unclear how TRPA may properly make such a finding without a complete and accurate analysis of VMT based on current conditions. The Bi-State Compact requires TRPA to adopt environmental threshold carrying capacities for the region and to make findings prior to project approval that the Project “will not cause the adopted environmental threshold carrying capacities of the region to be exceeded.” (League to Save Lake Tahoe)

**TRPA Response: Thank you for your involvement in the public scoping process. We look forward to continuing to work with citizens and agencies during the review of this project. The EA is not a National Environmental Policy Act (NEPA) document because no federal action is required to approve the project. TRPA required preparation of the EA is due to potentially significant effects to air quality and transportation as a result of an increase in Vehicle Miles Traveled (VMT) that may result from the proposed project. The public comments on these topics will inform the environmental analysis and development of the associated alternatives.**



## **Alternatives to the Proposed Project**

“My devil’s advocate comment on the whole thing is why they even need the events center: the casinos have huge ballrooms that can and should be used for concerts and performing arts events. Can’t they redesign those within the existing footprint? Those ballrooms go empty so much of the time, so we really need another events center?” (Dondra Biller)

“While I agree that we could use an events center it seems to me that you have already approved one - it now sits as bare columns across from Harvey’s Resort. They built the shopping and lodging and didn’t even bother building the event center everyone was excited about now they want to “build” another one? In my opinion they should complete the project that was already approved by all agencies instead of starting another to suit the same need, leaving bare column for everyone to see and probably just adding more t-shirt shops.” (Leonard Soares)

“3) Topic of Discussion: Proposed Activities. References: 3) South Shore Area Plan for Douglas County, Nevada, adopted by the TRPA Governing Board on September 25, 2013; 3a) Chapter 2 - Land Use Element, subsection, Socioeconomic Conditions (Page 30 of 77); 3b) Phase I: South Shore Area Plan, High Density Tourist District (Page 56 of 77). The description of the proposed activities is repeated verbatim below from the scoping notice. The text in italicized large font is the topic of discussion.

PROPOSED ACTIVITIES (3rd Paragraph): ***The majority of events will consist of corporate and association meetings and banquets and receptions, serving up to 1,200 attendees. This type of event typically occurs midweek (e.g., Sunday through Thursday) and during the spring and fall months.***

3a) Comment: As addressed in comment (2), the proposed activities are inconsistent with the TRPA and South Shore Plans for a world class recreation destination. Although the intent does support the goal of economic revitalization and growth, it is counterproductive. The proposed activities provide direct competition to existing businesses. Rather than promoting economic growth, economic activity will be diverted from one venue to another.

For example, from its website, the adjacent Mont Bleu Casino Hotel Resort already has the following facilities:

- Montbleu Theater: Large showroom for large presentations to accommodate 950 banquet-style or 1,500 patrons theater-style.
- Convention Center: 16,000 sq ft to host 950-1,200 patrons, depending on configuration and reconfigurable to 8 separate rooms.

These facilities may will be idle while events take place at a new events center. South Lake Tahoe presently has plans for construction of a new recreation center to replace the aged recreation center. Some members of the public have expressed desires for world class sports facilities and were told that such wasn’t in the South Lake Tahoe budget. Douglas County is here proposing its own significant events center to host basketball, hockey and volleyball, facilities that the South Tahoe Recreation Center already have and intend to continue to have. Having two facilities within less than 10 minutes of each other will only serve to economically depress the lesser facility.

For administrative offices, older nearby buildings can be remodeled or demolished and replaced with new buildings. Doing so would revitalize and redevelop the tourist core without using more land for development. Both of these achievements are consistent with TRPA and area goals. Reference (3a) itemizes lost gaming revenue, a decline in employment, population, school enrollment, reduction in local home ownership and affordable housing issues. Having an event center compete with local establishments for the same dollar, especially when

business may already be slow, such as mid-week and shoulder seasons, only makes economic survival that much more difficult.

3b) Proposed Resolution: Similar to Olympic Games venues, establish a cooperative effort between public and private entities to enable the proposed activities. For example, large meetings can be held at Mont Bleu, splinter meetings can be held within Mont Bleu or at the Edgewood Resort, (taken by local shuttle bus) on the MS Dixie or Safari Rose, at the top of Heavenly Ski Mountain (which would also increase Gondola use), local restaurants, and even at the local gaming tables (if business executives can discuss business over golf, silicon executives can jot ideas on napkins at local eateries, why not local gaming tables). Without new development and additional land use, outside of the absence of a showcase events center, increased business for existing establishments means more revenue, increased revenue enables business enhancements, higher salaries, perhaps better employee benefits, perhaps even conversion of seasonal jobs to year-round jobs, employees who may actually earn enough to afford to reside locally, increased use and support for local transportation, no change to existing traffic patterns, and so on. Local municipalities would also see greater tax revenue. This could become a win-win-win scenario (but a lost opportunity for developers). In any case, as with trade shows, the American Century Championship, Tour de California, Snow Globe, it would be prudent to use temporary measures to validate assumptions and desires. Some form of market research supported through years of growing attendance at an events center will provide justification for a permanent structure. From Reference (3b), immediately following the main objective is the following other objective: The other main objective is to provide a variety of recreational opportunities within walking distance from the bed base, such as skiing, golfing, biking, hiking, beach, lake, shopping, dining, entertainment. At an events center, visitors stay in the tourist core and see the core. The proposed solution takes visitors out to enjoy Lake Tahoe: A meeting atop Heavenly with a full panorama of the lake region, on a boat with an enjoyable view of the Lake, on a beachfront restaurant with a view of water activities. What better way to present the beauty of Lake Tahoe and entice business visitors to return? Such a plan is consistent with TRPA and area goals" (John Jay)

"4) Topic of Discussion: Proposed Activities. The description of the proposed activities is repeated verbatim below from the scoping notice. The text in italicized larger font and is the topic of discussion.

PROPOSED ACTIVITIES (5th Paragraph): The proposed design repurposes the existing surface parking between the Events Center and MontBleu for use as an *event lawn, public plaza and pedestrian paths* connecting the Events Center with the adjacent streetscape.

4a) Comment: Restore any surface not set aside for parking to its undeveloped state (e.g. - lawn, bare earth) and wait for the outcome of the US Highway 50 Loop effort. Should Alternative E, the Skywalk over existing US Highway 50, become the final solution, a Skywalk may negate the need for a public plaza. A skywalk draws visitors to the tourist core and provides business/shopper traffic. Growth of the local economy is consistent with area plans. A public plaza between the proposed events center and Mont Bleu keeps visitors on the outskirts of the tourist core and away from local businesses.

4b) Proposed Resolution: Postpone development of any public plaza until the outcome of the US Highway 50 Loop project is known. When the outcome of the US Highway 50 loop project is finally known, use of the bare earth can then be revisited and developed as deemed appropriate at the future date. It is much more costly to redo/undo a built public plaza, should that become the case. "(John Jay)

**TRPA Response: Thank you for your involvement in the public scoping process. We look forward to continuing to work with citizens and agencies during the review of this project. Event or community centers have been proposed in the past in the South Shore,**

such as Project 3 in South Lake Tahoe. These concepts have also been approved in the past, where smaller-scale venues have been developed, and larger scale venues have been abandoned prior to construction due to a lack of private-sector funding, a change in the desired land use concept, or other reasons. Although a Convention Center was proposed under Project 3, the Convention Center obligation under Project 3 was extinguished in 2016 with execution of a Release and Extinguishment of Certain CC&Rs by the successor to the South Tahoe Redevelopment Agency. Therefore, the Project 3 Convention Center previously approved but unbuilt will no longer be possible under the existing permit. The purpose and need for the project and the project objectives will be clarified to address the public comment concerning these topics. Additionally, the public comments on these topics will inform the environmental analysis and development of the associated alternatives.