

Edgewood Lodge and Golf Course Improvement Project

Final EIS



PREPARED FOR:
Tahoe Regional Planning Agency

July 27, 2012

Edgewood Lodge and Golf Course Improvement Project Final EIS



PREPARED FOR:

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July 27, 2012

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ACRONYMS AND ABBREVIATIONS

BMPs	best management practices
BWPC	Bureau of Water Pollution Control
Draft EIS	draft environmental impact statement
DVTE	Daily Vehicle Trip Ends
EWC	Edgewood Water Company
Final EIS	final environmental impact statement
IFC	International Fire Code
KGID	Kingsbury General Improvement District
LOS	level of service
NAC	Nevada Administrative Code
NDOT	Nevada Department of Transportation
NOP	Notice of Preparation
NPDWRs	National Primary Drinking Water Regulations
NRS	Nevada Revised Statute
ONRW	Outstanding National Resource Water
PCS	potential contamination source
SDWA	Safe Drinking Water Act
SWPPP	Stormwater Pollution Prevention Plan
TDFPD	Tahoe Douglas Fire Protection District
TRPA	Tahoe Regional Planning Agency
U.S. 50	U.S. Highway 50
VMT	Vehicle Miles Traveled

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1 INTRODUCTION

1.1 OVERVIEW

This document is a final environmental impact statement (Final EIS) prepared on behalf of the Tahoe Regional Planning Agency (TRPA) pursuant to the Tahoe Regional Planning Compact and the TRPA Code of Ordinances. On April 19, 2012, TRPA distributed the draft environmental impact statement (Draft EIS) on the Edgewood Lodge and Golf Course Realignment Project to public agencies and the general public. A public review period of 70 days was provided, which exceeds the minimum 60-day requirement of Article VII(b) of the Tahoe Regional Planning Compact, Article 6.13.2 of the TRPA Rules of Procedure, and Section 3.7.1.D of the TRPA Code of Ordinances. The review period began on April 19, 2012 and ended on June 28, 2012. Two public hearings were held to solicit comments on the Draft EIS: the first at the May 9, 2012 TRPA Advisory Planning Commission meeting and the second at the June 28, 2012 TRPA Governing Board meeting. Both meetings were held at TRPA's offices in Stateline, Nevada.

The approximately 231-acre project site is located within the Edgewood Tahoe Golf Course and includes a small area to the east across U.S. 50. The Edgewood Lodge and Golf Course Improvement Project would include construction of a new lodge complex with associated parking, and other improvements. The project would include the following major elements described in detail in the Draft EIS:

- ▲ construction of a 194-unit lodge complex, including accessory uses;
- ▲ expansion of the South Room at the Edgewood clubhouse;
- ▲ relocation of two existing lakefront residential lots;
- ▲ construction of a new public beach, lakefront recreation facilities, and pedestrian path;
- ▲ pier removal, relocation, and reconstruction;
- ▲ golf course and cart path modifications; and
- ▲ implementation of five threshold improvement projects.

The project would also involve transfers of development rights from offsite properties.

Written and oral comments were received from public agencies, organizations, and individuals. Pursuant to Article 6.14.1 of the TRPA Rules of Procedure, "at the conclusion of the comment period, TRPA shall prepare written responses to all written comments received during the comment period, and may respond to oral or late comments."

1.2 CERTIFICATION AND PROJECT APPROVAL PROCESS

The EIS is intended to be used by the TRPA Governing Board when considering approval of the proposed project or an alternative to the proposed project. In accordance with Article 6.16 of the TRPA Rules of Procedure, TRPA must certify the EIS by making, "a finding that the Final EIS is in compliance, procedurally and substantively, with Article VII of the Compact, Chapter 3 of the Code, and these Rules of Procedure." Before consideration of the proposed Final EIS by the TRPA Governing Board, the TRPA Advisory Planning Commission must review and make a recommendation to the Board regarding certification. The Board must provide an opportunity for comment on the Final EIS and has the discretion to limit such comment to the responses to comments or other new information in the proposed Final EIS. Per Article 6.16.3, "Prior to action by the Board on a project or matter for which an EIS was prepared, the Board shall certify a Final EIS. The Board shall not approve such a

project or matter for which an EIS was prepared prior to certification of a Final EIS.” Therefore, the Board must certify the EIS for the Edgewood Lodge and Golf Course Realignment Project before considering approval of the project. It is expected that the Board will hold a public hearing to consider certification of the Final EIS on August 23, 2012.

1.3 ORGANIZATION AND CONTENT OF THE FINAL EIS

This Final EIS is organized as follows:

- ▲ Chapter 1, “Introduction,” provides an overview of the environmental review process and presents a discussion of the EIS certification and project approval process.
- ▲ Chapter 2, “Comments and Responses to Comments on the Draft EIS,” contains a list of all agencies, organizations, and persons that submitted written comments on the Draft EIS or provided oral comments at the two public hearings during the public review period; copies of the comment letters and/or summary notes from the public hearings; and individual responses to the comments.
- ▲ Chapter 3, “Revisions and Corrections to the Draft EIS,” includes corrections, clarifications and other revisions to the Draft EIS text, based on issues raised by comments on the Draft EIS or TRPA-staff initiated text changes. Revisions are shown as excerpts from the Draft EIS text, with strikethrough (~~strikethrough~~) text for deletions and underlined (underlined) text for additions.
- ▲ Chapter 4, “References,” lists references cited in this document.

This document and the Draft EIS together comprise the Final EIS.

2 RESPONSES TO COMMENTS ON THE DRAFT EIS

2.1 INTRODUCTION

This Final EIS contains the comment letters received on the Draft EIS, including summarized oral comments received during the May 9, 2012 and June 28, 2012 public hearings, and individual responses to substantive environmental issues raised in those comments. The 70-day public review period began on April 19, 2012 and ended on June 28, 2012.

2.2 FORMAT OF COMMENTS AND RESPONSES

Comment letters and responses to comments are arranged and coded as follows:

- ▲ State Agencies (S)
- ▲ Local Agencies (L)
- ▲ Local Utilities, Service Providers, and Quasi-Governmental Entities (E)
- ▲ Organizations/Businesses (O)
- ▲ Individuals (I)
- ▲ Public Hearing (PH)

Each letter and each comment within a letter have been given an identification code. Responses correspond with comment codes, and are cross-referenced where appropriate to avoid redundancy.

2.3 LIST OF COMMENTERS

Table 2-1 lists all parties that submitted written comments on the Draft EIS. Individuals that provided oral comments at the public hearings are listed in the public hearing summary notes.

Table 2-1 List of Commenters		
LetterID	Commenter	Date of Comment
State Agencies (S)		
S1	California Department of Transportation, District 3	July 5, 2012
S2	Nevada Department of Transportation	April 19, 2012
S3	Nevada Division of Environmental Protection, Permits Branch–Bureau of Water Pollution Control	April 20, 2012
S4	Nevada Division of Environmental Protection, Public Water System Branch–Bureau of Safe Drinking Water	June 28, 2012
S5	Nevada Division of State Lands, Department of Conservation and Natural Resources	June 14, 2012
S6	Nevada State Historic Preservation Office	May 30, 2012
Local Agencies (L)		
L1	City of South Lake Tahoe, Community Development Department	June 28, 2012
L2	Douglas County, Board of Commissioners	June 26, 2012

Table 2-1 List of Commenters		
LetterID	Commenter	Date of Comment
Local Utilities, Service Providers, and Quasi-Governmental Entities (E)		
E1	Paiute Pipeline Company	June 28, 2012
E2	Tahoe Douglas Fire Protection District	June 25, 2012
E3	Tahoe Water Suppliers Association	June 27, 2012
Organizations/Businesses (O)		
O1	Barton Health	June 26, 2012
O2	Barton Health	June 18, 2012
O3	Carson Valley Chamber of Commerce and Visitors Authority	June 20, 2012
O4	Boys & Girls Club of Lake Tahoe	June 16, 2012
O5	Heavenly Lake Tahoe	June 25, 2012
O6	League to Save Lake Tahoe	June 27, 2012
O7	JMA Ventures, LLC	May 15, 2012
O8	Marriott Vacation Club International	June 27, 2012
O9	Midkiff & Associates, Inc.	June 26, 2012
O10	Sierra Colina, LLC	June 27, 2012
Individuals (I)		
I1	James F. Barr	June 23, 2012
I2	Casey Blann	June 25, 2012
I3	Patrick Fountain	Not dated
I4	Chris Proctor	June 25, 2012
I5	Patricia Sorokwasz	June 25, 2012
I6	Marilyn Spencer	Not dated
I7	Alison Stanton	June 28, 2012
I8	Paul Sterling	June 27, 2012
Public Hearing (PH)		
PH1	Public Hearing	May 9, 2012
PH2	Public Hearing	June 28, 2012

2.4 COMMENTS AND RESPONSES ON THE DRAFT EIS

The written and oral comments on the Draft EIS and the responses to those comments are provided in this section. Pursuant to Article 6.14.1 of the TRPA Rules of Procedure, “at the conclusion of the comment period, TRPA shall prepare written responses to all written comments received during the comment period, and may respond to oral or late comments.” All comment letters are reproduced in their entirety, and each is followed by responses to substantive environmental issues raised. Where a commenter has provided multiple comments, each comment is indicated by brackets and an identifying letter/number notation in the margin of the comment letter. During the public review period, 29 letters that identified environmental issues or questions, or offered support for the project, were submitted to TRPA. In addition to these letters, 19 commenters (including those representing organizations and businesses, as well as individuals) provided oral comments during the two public hearings.

2.4.1 STATE AGENCIES

S1

From: Angela Shepard [mailto:angela_shepard@dot.ca.gov]
Sent: Thursday, July 05, 2012 1:42 PM
To: Theresa Avance
Cc: Chuck Scharer (cscharer@edgewoodcompanies.com); lew@fnttahoe.com; Lyn Barnett (Lyn@wbaplanning.com); Nanette Hansel (nanette.hansel@ascentenvironmental.com); Patrick Rhamey
Subject: RE: Caltrans comments: Edgewood Lodge & Golf Course Improvement Project

Theresa,

I apologize about the late response. Since you are no longer obligated to consider late comments, I just wanted to send a brief email. We hope the following can be considered: The DEIR indicates that there is a traffic fee program that this project may contribute to. We do recommend that this project contributes to the fee program to mitigate the 7.5 increase in average delay through the Park Ave. and Highway 50 intersection, as indicated on Table 5.10-8.

S1-1

Please contact me if you have any questions.

Thank you,

Angela Shepard
Transportation Planner
Office of Transportation Planning - North
Division of Planning and Local Assistance
Caltrans - District 3
703 B Street
Marysville, CA 95901

Phone: (530) 740-4992
angela_shepard@dot.ca.gov

Response S1	California Department of Transportation, District 3 Angela Shepard, Transportation Planner, July 5, 2012
------------------------	---

S1-1 The commenter recommends that the project contribute to a traffic fee program to mitigate the increase in average vehicle delay in seconds through the U.S. 50 and Park Avenue intersection (as indicated in Table 5.10-8 of the Draft EIS).

The EIS evaluates traffic level of service (LOS) impacts at nearby intersections including the U.S. 50/Park Avenue intersection under existing plus project conditions (Table 5.10-8 on page 5.10-18 of the Draft EIS), and cumulative plus project conditions in 2029 without (Table 5.15-4 on page 5.15-26 of the Draft EIS) and with the proposed US 50/South Shore Community Revitalization Project (Impact 5.15-24 on page 5.15-30). Under each of these scenarios the project would result in an incremental increase in the number of seconds of delay at the U.S. 50/Park Avenue intersection relative to the no project condition, but would not degrade the total LOS of the intersection. For these reasons, the EIS concludes that the project would result in a less-than-significant traffic impact related to LOS at this intersection, so no mitigation would be required.

Notwithstanding the above, as described on page 5.10-24 of the Draft EIS, pursuant to Subsection 65.2.4(C) of the TRPA Code of Ordinances, an air quality mitigation fee would be required for the new trips associated with the proposed land uses to “offset the potential traffic and air quality impacts” of the project. The project applicant would be required to pay this fee prior to TRPA permit acknowledgement. It is important to note, however, that fees are collected for purposes of mitigating cumulative air quality impacts and would not necessarily directly address the increased delay at the U.S. 50/Park Avenue intersection.


Skip Canfield

From: Compton, Mary T [tcompton@dot.state.nv.us]
Sent: Tuesday, June 12, 2012 7:30 AM
To: Skip Canfield
Subject: RE: Nevada State Clearinghouse Notice E2012-209

Please see NDOT's remarks in the "comments" section. Thanks, Terri

From: scanfield@lands.nv.gov [mailto:scanfield@lands.nv.gov]
Sent: Thursday, April 19, 2012 2:19 PM
Cc: hjudge@trpa.org
Subject: Nevada State Clearinghouse Notice E2012-209

 **NEVADA STATE CLEARINGHOUSE**
 Department of Conservation and Natural Resources, Division of State Lands
 901 S. Stewart St., Ste. 5003, Carson City, Nevada 89701-5246
 (775) 684-2723 Fax (775) 684-2721

TRANSMISSION DATE: 04/19/2012

Tahoe Regional Planning Agency
Nevada State Clearinghouse Notice E2012-209
Project: DEIS Edgewood Lodge and Golf Course

Follow the link below to find information concerning the above-mentioned project for your review and comment.

E2012-209 - <http://clearinghouse.nv.gov/public/Notice/2012/E2012-209.pdf>

- Please evaluate this project's effects on your agency's plans and programs and any other issues that you are aware of that might be pertinent to applicable laws and regulations.
- Please reply directly from this e-mail and attach your comments.
- Please submit your comments no later than Wednesday June 13th, 2012.

[Clearinghouse project archive](#)

Questions? Skip Canfield, Program Manager, (775) 684-2723 or nevadaclearinghouse@lands.nv.gov

____ No comment on this project ____ Proposal supported as written

AGENCY COMMENTS:

For any temporary and/or permanent encroachment work performed within the state's right-of-way, a permit will be required from the District II office. Thank you. Thor.

I S2-1



Thor A. Dyson, P.E., CPM - District II Engineer
310 Galletti Way/Sparks, Nevada 89431
(775) 834-8300 - phone/(775) 834-8390 - fax

Signature:

Date:

Requested By:
Brian Judge

This communication, including any attachments, may contain confidential information and is intended only for the individual or entity to whom it is addressed. Any review, dissemination or copying of this communication by anyone other than the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and delete all copies of the original message.

Response S2	Nevada Department of Transportation Thor A. Dyson, P.E., CPM – District II Engineer, April 19, 2012
S2-1	<p>The commenter indicates that for any temporary and/or permanent encroachment work performed within the state’s right-of-way, a permit would be required from the Nevada Department of Transportation (NDOT) District II office.</p> <p>At this time, construction of the proposed project is not expected to be conducted within the State of Nevada right-of-way; therefore, an encroachment permit from Nevada DOT is not anticipated to be needed. Nevertheless, Table 2-1 on pages 2-2 and 2-3 of the Draft EIS is revised in Chapter 3 of this Final EIS to include the possibility of acquiring this permit (if it becomes necessary).</p>



Skip Canfield

From: Alex Lanza
Sent: Friday, April 20, 2012 12:29 PM
To: Skip Canfield
Subject: RE: Nevada State Clearinghouse Notice E2012-209 - DEIS Edgewood Lodge and Golf Course

Good afternoon Skip;

The Nevada Division of Environmental Protection (NDEP) - Bureau of Water Pollution Control (BWPC) - does not have any comments regarding **E2012-209 - DEIS Edgewood Lodge and Golf Course, Nevada.**

| S3-1

Please note that the entity who manages this **DEIS Edgewood Lodge and Golf Course Project**, may be subject to BWPC permitting associated with any of its discharges – including, but not limited to well development, wastewater, Diminimis, UIC, and domestic sewage discharges.

| S3-2

Thank you for the information and the opportunity to comment.

If you have any questions, please contact me at (775) 687-9468.

Respectfully,

Alexi Lanza

Alexi Lanza, P.E.
Permits Branch - Bureau of Water Pollution Control
Nevada Division of Environmental Protection
901 S. Stewart St., Ste 4001
Carson City NV 89701
Phone: 775.687.9468 - Fax: 775.687.4684
www.ndep.nv.gov

Response S3	Nevada Division of Environmental Protection, Permits Branch—Bureau of Water Pollution Control Alexi Lanza, P.E., April 20, 2012
S3-1	The comment is noted. Thank you for your review of the Draft EIS.
S3-2	<p data-bbox="332 386 1468 527">Table 2-1 in the Draft EIS lists the potential permits and authorizations that may be required for development of the project beyond the primary TRPA Project Permit. As noted in Table 2-1 in the Draft EIS, a Stormwater Pollution Prevention Plan (SWPPP) is listed as a requirement of the Nevada Division of Environmental Protection for project implementation.</p> <p data-bbox="332 562 1468 695">The commenter notes that permits from the Nevada Division of Environmental Protection, Bureau of Water Pollution Control (BWPC) may also be required for well development and other water discharges at the site. Table 2-1 on pages 2-2 and 2-3 of the Draft EIS is revised in Chapter 3 of this Final EIS to include the additional BWCP permitting that may be required.</p>

S4



STATE OF NEVADA
 Department of Conservation & Natural Resources
 DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor
 Lea M. Drozdoff, P.E., Director
 Colleen Cripps, Ph.D., Administrator

June 28, 2012

Theresa Avance, AICP
 Senior Planner
 Tahoe Regional Planning Agency
 PO Box 5310
 Stateline, NV 89449

RE: Edgewood Water Company (NV0000235) & Kingsbury GID (NV0000004)—Edgewood Lodge and Golf Course Improvement Project Draft Environmental Impact Statement
 In reply, please refer to project number (DO-4286-12)

Dear Ms. Avance,

The Nevada Division of Environmental Protection (NDEP), Bureau of Safe Drinking Water (BSDW) appreciates the opportunity to review the Draft Environmental Impact Statement (EIS) for the Edgewood Lodge and Golf Course Improvement Project. As discussed further herein, our comments build on earlier phases of the project planning process, and we look forward to working with the appropriate parties to help ensure long term protection of public health.

On July 10, 2009, the NDEP-BSDW, commented on the Preparation of the Draft EIS for the above mentioned project. The two enclosed letters were sent, one with respect to the Edgewood Water Company (EWC) and one with respect to the Kingsbury General Improvement District (KGID) public water systems and the potential impacts the project could have to their public water system status and drinking water.

Based on historic data and the existing watershed control program, the water systems have been able to serve drinking water that is disinfected but not filtered. This status is very unique, and stringent requirements are placed on the water system for raw water monitoring and for maintaining a watershed that minimizes the potential for *Giardia lamblia*, viruses and *Cryptosporidium* in their watershed. As part of new State and Federal regulatory requirements, both EWC and KGID are in the design stage for upgrades to their treatment plants; however, these design plans do not currently include installation of filtration systems for surface water treatment.

In general, the NDEP-BSDW believes that the Draft EIS does not provide enough background research to substantiate the conclusion that the impacts to the EWC are less than significant. Furthermore, the impacts to KGID are not discussed. If the impacts of this project dictate that a different type of treatment may be necessary, the immediacy of this knowledge is critical to the water systems installing the appropriate treatment technology.

S4-1



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June 28, 2012

Page 2 of 4

Re: **EWC (NV0000235) & KGID (NV0000004):** Edgewood Lodge and Golf Course Improvement Project—Draft EIS Project #DO-4286-12

In more detail, the following comments are being provided with regard to the Draft EIS:

Page 1-30, Impact 5.6.1-8: The impact to the Edgewood Water Company primary water supply is found to be “less than significant”. It is unclear from the Draft EIS what research substantiates this conclusion. To aid in resolving this apparent data gap, the NDEP-BSDW notes that the “Lake Tahoe Source Water Protection Assessment Final Report” dated October 2008, includes a tool which is available to aid in determining impacts to drinking water intakes from source water contamination. Any modification in land use within the project area boundary must be evaluated for its potential impacts to the drinking water systems. The addition of public beach access is a major change in land use which must be made a part of the public water systems’ watershed control program as required by Nevada Administrative Code (NAC) 445A.525 which references 40 Code of Federal Regulations (CFR) §141.71 and §§141.520 thru 141.522. 40 CFR §141.71 (2) and §§141.520 thru 141.522 require that the watershed control program take steps to “minimize the potential for contamination by *Giardia lamblia* cysts and viruses *Cryptosporidium* oocysts in the source water...”

S4-2

Furthermore, this section does not address any potential impacts to the KGID primary water supply, which we believe is within 600 feet of the project area boundary as depicted on Exhibit 3-2. The KGID intake has a significantly shorter setback from the shoreline and should be addressed within the scope of the EIS.

S4-3

Increases in bathing and other beach-going uses are a source of potential contamination that should be further investigated. It is anticipated that further investigation would either: (1) ensure that there is no potential for impact; or (2) allow for initiation of appropriate planning steps by EWC and KGID to react to future decreases in drinking water quality.

S4-4

Page 1-35, Impact 5.6.2-8: Same comment as Impact 5.6.1-8 comment.

S4-5

Page 1-39, Impact 5.6.3-8: Same comment as Impact 5.6.1-8 comment.

Page 3-46, Utilities: The first sentence states that “the proposed project would require new utility lines for water supply...” Any modification to the water system, whether it be waterlines, treatment or pump stations, is a water project that requires plan review by BSWD pursuant to NAC 445A.6669. Furthermore, this section does not mention how the water utility will provide water to its customers during the project construction period. Nevada Administrative Code (NAC) 445A.66615 requires that the water system “ensure a reliable supply of water.” This must be maintained during project construction. If the project presumes use of water supplied by KGID during construction, it may also be critical to outline the construction timeframe to ensure that KGID can also maintain a reliable supply of water to its customers.

S4-6

June 28, 2012

Page 3 of 4

Re: **EWC (NV0000235) & KGID (NV0000004):** Edgewood Lodge and Golf Course Improvement Project—Draft EIS Project #DO-4286-12

Page 5.2-28, Policy 9: Rationale indicates that “As discussed in Section 5.6, “Hydrology and Water Quality,” these distances combined with the depths of the intakes is sufficient to protect water quality.” It is unclear from the Draft EIS what research substantiates this conclusion. In addition, this section does not make mention of the KGID intake, which has a significantly shorter setback from the shoreline and is within 600 feet of the project area boundary as depicted on Exhibit 3-2.

S4-7

Page 5.6-31, regarding Impact 5.6.1-8: In the first paragraph following the impact statement, the statement is made that the “proposed pier extension and relocation would not cause an increase in the number of boats on the lake...” Further on, it states that “the placement of the reconstructed pier and buoys would have no measureable effect on existing water supply intakes, as any increases in boat activity related to the pier would be near the shoreline.” It is unclear between these two sentences as to whether or not increased boating activity is expected. Would more boats be able to stop in the shoreline? NAC 445A.6698 requires that “the intake has a diversionary device that is designed and located in such a manner as to prevent damage from marine vehicles and anchors.” Any increase in boating activity would subsequently increase the risk of structural damage to the water supply intake.

The third paragraph mentions three protected drinking water sources within 600 feet of the project area. It is unclear as to why KGID water supply intake is not considered to be within 600 feet of the project area boundary as depicted on Exhibit 3-2.

S4-8

Furthermore, the document states that “prior to issuance of a TRPA permit, the project applicant would be required to comply with the source water protection provisions contained in Section 60.3.3.D of the TRPA Code.” Section 2 of this Code requires TRPA to solicit comment from the “department of health with jurisdiction over the source water prior to action being taken on the proposed project.” It is imperative that the project proponents be able to provide rationale that is supported by research that upon completion of this project the intakes will continue to meet the requirement of NAC 445A.525 for sources at Lake Tahoe. In addition, the creation of a new Potential Contaminating Source (PCS) related to microbial contamination will require additional monitoring as outlined in NAC 445A.5195. The public beach is a microbial PCS, as noted in Section 60.3.5 of the TRPA Code.

If upon further review mitigation is required, the BSDW is amenable to discussing mitigation measures with the project proponents and the water systems.

Page 5.6-39, regarding Impact 5.6.2-8: Same comment as Impact 5.6.1-8 comment.

Page 5.6-43, regarding Impact 5.6.3-8: Same comment as Impact 5.6.1-8 comment.

June 28, 2012

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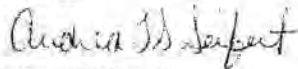
Re: **EWC (NV0000235) & KGID (NV0000004):** Edgewood Lodge and Golf Course Improvement Project—Draft EIS Project #DO-4286-12

Page 5.8-1, Human Health and Risk of Upset: Please add the Safe Drinking Water Act, the Nevada Revised Statutes and Nevada Administrative Code for public water systems to this portion of the document.

S4-9

If I can provide any further information, please contact me at (775) 687-9526 or aseifert@ndep.nv.gov.

Sincerely,



Andrea LS Seifert, PE
Public Water System Compliance Branch Supervisor
Bureau of Safe Drinking Water

cc: Jennifer Carr, P.E., Chief, NDEP, BSDW
Jim Balderson, P.E., Engineering Supervisor, NDEP, BSDW
Reggie Lang, P.E., Facility Manager, NDEP, BSDW
Dave Emme, NDEP Deputy Administrator
Dave Gaskin, NDEP Deputy Administrator
Cameron McKay, Kingsbury GID, P.O. Box 2220 Stateline, NV 89449
Scott Shunter, Edgewood Water Company, P.O. Box 5400, Stateline, NV 89449
Brandon S. Hill, Edgewood Companies, 1300 Buckeye Road Suite A, Minden, NV, 89423
Madonna Dunbar, Tahoe Water Suppliers Association, 1220 Sweetwater Road, Incline Village, NV 89451

Enclosures



STATE OF NEVADA

Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor
Allen Blagel, Director
Leo M. Draxloff, P.E., Administrator

July 2, 2009

A. Lyn Barnett
Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

RE: Edgewood Hotel and Golf Course Realignment Project --Preparation of Draft
Environmental Impact Statement
In reply, please refer to project number (DO-3551-09)

Dear Mr. Barnett,

Edgewood Water Company is classified as a public water system that has "Filtration Avoidance" status. Based on historic data and the existing watershed control program, the water system has been able to serve drinking water that is disinfected but not filtered. This status is very unique, and stringent requirements are placed on the water system for raw water monitoring and for maintaining a watershed that minimizes the potential for *Giardia lamblia*, viruses and *Cryptosporidium* in their watershed.

Nevada Administrative Code (NAC) 445A.525 stipulates the conditions under which filtration avoidance status is granted and maintained. Prior to the Edgewood Water Company installing an ozone treatment plant, the State of Nevada determined that they were eligible for filtration avoidance status. No significant changes in water quality have been observed since the original study of the intake's susceptibility to *Giardia lamblia*, viruses and *Cryptosporidium*.

This project as it relates to the public beach access and short-term increases in sediment load represents an increase in potential contamination sources around the intake and is therefore of concern to Nevada Bureau of Safe Drinking Water (BSDW). Due to this project, the intake will be susceptible to a higher risk of turbidity and microbial loading at the intake. Therefore, the Edgewood Water Company would be required to update its Watershed Control Program and Emergency Response Plan to provide mitigation to reduce the risks.

If at any time BSDW sees an increase in the levels of microbial loading at the intake, steps will be taken to re-evaluate the water system's filtration avoidance status. Failure of the water system to meet any of the requirements of NAC 445A.525 will require disinfection and filtration pursuant to 40 Code of Federal Register §§141.72 and 141.73. If BSDW determines the water system must filter, Edgewood Water Company will have 18 months to install a filtration system that meets the requirements of the Surface Water Treatment Rule.

In addition to maintaining Edgewood Water Company's source water quality, this project could impact the existing water pump station, existing water mains and laterals, and new service.



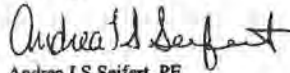
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connections. The Design and Construction Regulations for Public Water Systems, NAC 445A.65505 thru NAC 445A.6731, establish provisions to ensure that the Edgewood Water Company can provide a safe and reliable supply of water to all of its customers. This includes demonstrating that the potable water distribution system is properly designed, separations of lines between potable and non-potable waterlines are maintained, adequate water rights and capacity are available for serving customers, and cross connection control measures are met. Edgewood Water Company must remain in compliance with the associated regulations with the addition of this project.

If I can provide any further information, please contact me at (775) 687-9526.

Sincerely,



Andrea LS Seifert, PE

cc: Jennifer Carr, P.E., Chief, Bureau of Safe Drinking Water
Jim Balderson, P.E., Engineering Supervisor, NDEP, BSDW
Patty Lechler, PWS Regulatory Oversight, NDEP, Supervisor
Cindy Mathews, Edgewood Water Company, 1300 Buckeye Rd Ste A, Minden, NV 89423
Jim Summers, Edgewood Water Company, P.O. Box 5400, Stateline, NV 89449
Cameron McKay, Sierra Water Management, P.O. Box 3002, Stateline, NV 89449
Madonna Dunbar, Tahoe Water Suppliers Association, 1220 Sweetwater Road, Incline Village, NV 89451



STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor
Allen Blaggs, Director
Leo M. Drazdoff, P.E., Administrator

July 10, 2009

A. Lyn Barnett
Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

RE: Edgewood Hotel and Golf Course Realignment Project—Preparation of Draft
Environmental Impact Statement
In reply, please refer to project number (DO-3551-09)

Dear Mr. Barnett,

Kingsbury General Improvement District (KGID) is classified as a public water system that has "Filtration Avoidance" status. Based on historic data and the existing watershed control program, the water system has been able to serve drinking water that is disinfected but not filtered. This status is very unique, and stringent requirements are placed on the water system for raw water monitoring and for maintaining a watershed that minimizes the potential for *Giardia lamblia*, viruses and *Cryptosporidium* in their watershed.

Nevada Administrative Code (NAC) 445A.525 stipulates the conditions under which filtration avoidance status is granted and maintained. Prior to KGID installing an ozone treatment plant, the State of Nevada determined that they were eligible for filtration avoidance status. No significant changes in water quality have been observed since the original study of the intake's susceptibility to *Giardia lamblia*, viruses and *Cryptosporidium*.

This project as it relates to the public beach access and short-term increases in sediment load represents an increase in potential contamination sources around the intake and is therefore of concern to Nevada Bureau of Safe Drinking Water (BSDW). Due to the proximity of this project to the KGID intake, the intake would be susceptible to a higher risk of turbidity and microbial loading. Therefore, KGID would be required to update its Watershed Control Program and Emergency Response Plan to provide mitigation to reduce the risks.

If at any time BSDW sees an increase in the levels of microbial loading at the intake, steps will be taken to re-evaluate the water system's filtration avoidance status. Failure of the water system to meet any of the requirements of NAC 445A.525 will require disinfection and filtration pursuant to 40 Code of Federal Register §§141.72 and 141.73. If BSDW determines the water system must filter, KGID will have 18 months to install a filtration system that meets the requirements of the Surface Water Treatment Rule.



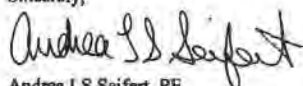
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printed on recycled paper



If I can provide any further information, please contact me at (775) 687-9526.

Sincerely,



Andrea L.S. Seifert, PE

cc: Jennifer Carr, P.E., Chief, Bureau of Safe Drinking Water
Jim Balderson, P.E., Engineering Supervisor, NDEP, BSDW
Patty Lechler, PWS Regulatory Oversight, NDEP, Supervisor
Cameron McKay, Kingsbury GHD, P.O. Box 2220 Stateline, NV 89449
Madonna Dunbar, Tahoe Water Suppliers Association, 1220 Sweetwater Road, Incline
Village, NV 89451

Response S4	Nevada Division of Environmental Protection, Public Water System Branch-Bureau of Safe Drinking Water Andrea Seifert, P.E., June 28, 2012
S4-1	<p>This comment includes prefatory remarks that establish the context for subsequent detailed comments. The public scoping comment letters referenced in this comment, one with respect to Edgewood Water Company (EWC) and one with respect to the Kingsbury General Improvement District (KGID), are included in Appendix A of the Draft EIS. Accordingly, the Draft EIS addresses the effects on source water quality associated with the proposed pier and related boat activity, and increased beach recreation in Impacts 5.6.1-8, 5.6.2-8, and 5.6.3-8 for development Alternatives 1, 2, and 3, respectively. The responses to comments S4-2 through S4-9 provide additional information to support the Draft EIS conclusion that the development alternatives would not adversely affect source water quality.</p>
S4-2	<p>The commenter requests additional information to substantiate the conclusion that the project's impact to the EWC primary water supply would be less than significant and identifies a modeling tool that was developed as part of the Lake Tahoe Source Water Protection Assessment Final Report (Assessment Report, October 2008) to evaluate impacts to drinking water intakes from source water contamination. Specifically, the comment asserts that the addition of public beach access at Edgewood is a major change in land use that must be made a part of the public water system's watershed control program with respect to minimizing "the potential for contamination by <i>Giardia lamblia</i> cysts and viruses <i>Cryptosporidium</i> oocysts in the source water..."</p> <p>As part of its due diligence, EWC evaluated potential impacts to its primary water supply line in 2011. Robert Anderson, P.E., WRS, CFM, Principal Engineer with RO Anderson, on behalf of EWC, used information from the Lake Tahoe Source Water Protection Assessment to evaluate potential impacts to the EWC water system. The purpose of the evaluation was to attempt to quantify and assess the water quality risks and probability of infection resulting from body-contact recreational activities (swimming, water skiing, jet skiing, and other forms of direct contact). The memorandum included a comparative evaluation of the EWC intake and treatment means to the three water systems evaluated in the Assessment Report: Burnt Cedar (an Incline Village General Improvement District line in Incline Village), McKinney/Quail (a Tahoe City Public Utility District line on the west shore), and the KGID line north of the project site). The complete memorandum is added as Appendix K to the EIS. Key findings from the RO Anderson memorandum include (Anderson 2011):</p> <ol style="list-style-type: none"> 1. The science used to predict the risks associated with body-contact recreation and vulnerability to contamination from spills is complex and dependent on numerous variables. As a result, such assessments of risk result in approximations and probabilities of occurrences. That is, these risks cannot be precisely determined or predicted. 2. Given the configuration of the EWC intake, 2,500 feet long and 34 feet deep, it is significantly farther removed from those persons participating in body-contact recreation at existing beaches or other potential activity centers than the intakes to the water systems evaluated in the Assessment Report. As a result, the memorandum concluded that the risk to EWC is lower than the calculated and reported risks to the KGID or the Burnt Cedar water systems. The Assessment Report determined that if the treatment upgrades required by the U.S. EPA Long-term 2 Enhanced Surface Water Treatment Rule (LT-2) to be made by 2014

are implemented at Burnt Cedar and KGID, the risk of exceeding EPA's target risk level of 1 infection per 10,000 visitors (i.e., drinking water customers) per year from body-contact recreation were 0.1% and 0.03%, respectively. Accordingly, the memorandum finds that upon implementation of the required LT-2 treatment modifications and improvements by EWC, the risk level for EWC customers would also be less than 0.1% for body-contact recreation activities.

3. The EWC intake, similar to all other water intakes in the Lake, is vulnerable to contamination by unforeseen pollutant spills. In the event of a contaminant spill with a high concentration of particulate matter, such as a sewage spill, UV inactivation treatment (one of the treatment upgrade options required to meet the LT-2 Rule) would likely be insufficient for pathogen removal. (Body-contact recreation would generate much lower pollutant levels, such that UV inactivation treatment would be adequate.) High concentrations of particulate matter would tend to lower the UV inactivation rate rendering it less effective than microfiltration for removal of such contaminants.

In response to this Draft EIS comment, RO Anderson on behalf of EWC, evaluated potential risks using the spreadsheet-based simplified pollutant-transport model tool (Lake Tahoe Transport Model) developed as part of the Assessment Report and recommended for use in evaluating the proposed project in this comment. According to the memorandum, the model was developed as a tool for utilities to use during a spill event to provide insight as to the contaminant risk at their intakes. Model outputs include estimates of the following:

- a. The likelihood that pollutants from a given contaminant spill would reach the intake to a public water supply,
- b. The amount of time required to reach each affected intake, and
- c. The amount of dispersion that would occur during transport.

The model does not, however, calculate or predict probabilities or risks of infections resulting from additional body contact recreation activities near public water supply intakes (Anderson 2012).

The RO Anderson modeling effort simulates the probable outcomes from a contaminating event occurring at or very near the beach at two separate locations. Modeling results are incorporated here by reference and the complete study is included in Appendix K. The study finds that with implementation of planned upgrades to meet the requirements of LT-2, the risk of exceeding EPA's target risk level of 1 infection per 10,000 visitors (i.e., drinking water customers) per year from body-contact recreation, including anticipated increases in activities associated with the proposed lodge project, would be less than 0.1%. The EWC intake, similar to other public water supply intakes in Lake Tahoe, is vulnerable to catastrophic events that could result in a contaminant spill. The memorandum concludes, based on the modeling conducted, that the proposed project would have limited, if any, impact on the ability of the EWC to continue to meet federal and state drinking water standards, including the provisions of Nevada Administrative Code (NAC) 445A.525 that pertain to filtration avoidance.

The RO Anderson study notes that EWC has initiated the design and permitting of the required upgrades to its treatment system to meet the LT-2 rule by using ultraviolet methods to supplement its current disinfection processes (ozone). EWC anticipates that they will be

prepared to submit those designs for review by permitting agencies during the fall of 2012, and subject to requisite approvals, construction is anticipated to begin in spring or summer 2013.

S4-3

The commenter indicates the KGID water intake line should be addressed in the EIS. The point where the KGID water intake line extends lakeward from the beach is within approximately 450 feet of the northernmost project area boundary. The mouth of the KGID intake line is well over 600 feet from the closest proposed Shorezone activities (relocated pier and new public beach area). In response to this comment (and comment S4-8 below), the text of Section 5.6, Hydrology and Water Quality, page 5.6-31, third full paragraph is revised as follows to clarify the location of the KGID water intake line relative to the project area boundary and the proposed pier and public beach area:

Projects within 600 feet of a drinking water source identified by TRPA require special consideration as described in Section 60.3 of the TRPA Code and are afforded protection under the Lake Tahoe Source Water Protection Program. There are ~~four~~three protected drinking water sources within 600 feet of the project area boundaries: the Edgewood Water Company (EWC) intake line (00703003111) that extends into Lake Tahoe from a location north of the existing lakefront residences; the Kingsbury General Improvement District (KGID) intake line (00709005111); and two active wells (02903603W11 and 02905101W11) south of the project area boundary near golf hole 9 in California (TRPA 2000). The mouth of the KGID water intake line is located well over 600 feet from the proposed pier and public beach area associated with the proposed project (and about 900 feet from the project area boundary), but from the point where the intake line extends lakeward from the beach the line is within approximately 450 feet of the northernmost project area boundary. Prior to acknowledgement issuance of the TRPA permit, the project applicant would be required to comply with the source water protection provisions contained in Section 60.3.3.D of the TRPA Code. The creation of a new potential contamination source (PCS) related to microbial contamination would require additional monitoring as outlined in NAC 445A.5195. The proposed public beach is a microbial PCS, as noted in Section 60.3.5 of the TRPA Code.

Also, in response to this comment, the text of Section 5.6, Hydrology and Water Quality, page 5.6-32, first paragraph is revised as follows:

The mouth of the EWC primary water supply intake is located over 2,000 feet from the closest point of the proposed pier and the proposed public beach at a depth of 34 feet, and an adjacent parallel back-up water intake is located over 700 feet from the beach. The mouth of the KGID water intake line is approximately 3,150 feet (more than one-half mile) from the closest point of the proposed pier and 3,250 feet from the closest part of the proposed public beach at Edgewood. The depth of the water intake line is 60 feet. These distances from the shoreline, combined with the depths of the intakes is sufficient to protect source water quality of the intakes. More specifically, as documented in the source water evaluation memorandums included in Appendix K to this EIS, the risk of exceeding the U.S. EPA's target risk level of 1 infection per 10,000 visitors (i.e., drinking water customers) per year from body-contact recreation would be less than 0.1%. This impact is considered **less than significant**.

The mouth of the KGID water supply intake line is located more than 500 feet farther from the proposed pier and public beach area at Edgewood than the EWC intake line. Further, the

Assessment Report (as cited in the 2012 memorandum from RO Anderson) identifies that the KGID “intake is most vulnerable to spills or other releases...to the north, near Nevada Beach and that...[modeled scenarios of] spills to the south of the intake yielded very low predicted concentrations.” As such, it is appropriate that the Draft EIS and the subsequent memorandum from RO Anderson focus on the EWC water intake line.

S4-4 See response to comment S4-2.

S4-5 See response to comment S4-2.

S4-6 The commenter provides two NAC references (NAC 445A.6669 and 445A.66615) pertaining to the construction of new water lines at the project site and ensuring a reliable water supply is maintained to existing customers during construction. The commenter is directed to Section 5.14, Public Services and Utilities, where Impact 5.14.1-1 includes additional information on water supply line improvements for the proposed project. In response to this comment, the text of Section 5.14, Public Services and Utilities, page 5.14-10, second paragraph, is revised as follows to incorporate additional information:

The proposed project site would likely be served by EWC’s water system via an existing 12-inch water supply line. The 12-inch water supply line that extends through the project site with connections from the main line to proposed onsite uses would be relocated along the realigned entry road. To the extent feasible, new utilities would be located under existing or proposed roadways and appropriate utility easements would be finalized as part of the permitting process. Modifications to the water system, including new water distribution lines, would be subject to NDEP, Bureau of Safe Drinking Water review pursuant to NAC 445A.6669. The existing 12-inch water supply line connects to a larger main on the Horizon property. EWC has indicated that the existing 12-inch water supply line or portions thereof either on or off site may need to be replaced as part of the proposed project (King, pers. comm., 2011). Further studies are needed, which would not commence until latter stages of design, to determine the need for the water supply line replacement. For the purposes of this EIS, it is assumed that the 12-inch water line would not need to be replaced. If determined to be necessary during final design, any the pipeline replacement occurring outside of the proposed project area would be subject to separate and subsequent environmental review and permitting by TRPA, Douglas County, and EWC. If an upsizing of the proposed water supply line within the proposed project area were required, it would occur within the entry road alignment already evaluated as part of this EIS. If replacement were required, it would be within the existing footprint and would include trenching techniques that could result in temporary air quality, noise, traffic, and water quality impacts. The types of temporary construction impacts would be similar to those discussed and analyzed in this EIS.

Pursuant to NAC 445A.66615, water system improvements would be constructed in a manner that would maintain a reliable supply of water to existing EWC customers during construction. The water system improvements contemplated with the proposed project would involve the realignment of both raw water lines and water supply lines for EWC. Typical of a project of this nature, this would be accomplished by constructing the new facility infrastructure before taking the existing infrastructure offline. Once constructed and tested, the new utility lines would be brought on line by switching the

system to the new lines without disruption to EWC customers. The construction plans and methods for activating the new lines would be subject to NDEP, Bureau of Safe Drinking Water review and oversight.

In addition, the Bureau's review role as it relates to any water system modifications has been added to Table 2-1 in Chapter 3 of this Final EIS.

S4-7 See responses to comments S4-2 and SR-3.

S4-8 The commenter requests clarification on the potential for increased boating activity associated with the proposed pier and states that any increase in boating activity would increase the risk of structural damage to the water supply line. The commenter again requests that the KGID line be considered in the EIS, and identifies additional monitoring requirements related to microbial contamination as outlined in NAC 445A.5195 associated with the proposed beach.

See responses to comments S4-2 and S4-3. Text revisions identified in the response to comment S4-3 includes the additional specific information on microbial monitoring.

As described in the Draft EIS (Impact 5.6.1-8), the proposed pier extension and relocation would not cause an increase in the number of boats on the lake because there would be no increase in the number of available buoys, no boat launching facility at the project site, no additional permanent mooring buoys, and no marina facilities. The foregoing was intended to characterize that boat access to the pier would be from existing boats already on the lake. Lodge guests would not be allowed to launch a boat at Edgewood. The proposal includes a 32-foot extension of the pier relative to the existing pier and 30-foot wide L-shaped configuration at its lakeward end. Boat lengths vary, but assuming an average 20-foot boat length, the expanded pier would be able to accommodate approximately three additional boats relative to the existing pier. Alternatives 1 and 2 would move the pier farther north of the existing water intake line. The Alternative 3 pier would reconstruct the pier in its current location, where the pier and the line diverge from each other today. The water intake line is marked by an existing navigational buoy permitted by the Nevada Division of State Lands. Because the potential increase in boat activity is minor, and the proposed project would distance the pier from the water intake line, the proposed project would not increase the risk of structural damage to the water supply intake line.

S4-9 The commenter requests that a description of the Safe Drinking Water Act, the Nevada Revised Statutes and Nevada Administrative Code for public water systems be added to Section 5.8, Human Health and Risk of Upset. As described in the first paragraph on page 5.8-1 of the Draft EIS, "the potential for the project to affect the Edgewood Water Company water intake lines is discussed in Section 5.6, Hydrology and Water Quality." As such, Section 5.8, Human Health and Risk of Upset, does not address public water systems, and thus the recommended additions are made to Section 5.6, Hydrology and Water Quality, where this issue is addressed in the EIS. In response to this comment, the following paragraph is added after the fourth full paragraph of page 5.6-1 (Section 5.6, Hydrology and Water Quality) to incorporate the recommended regulatory information related to the Safe Drinking Water Act:

FEDERAL ANTIDEGRADATION POLICY

The EPA has designated Lake Tahoe an Outstanding National Resource Water (ONRW). ONRWs are provided the highest level of protection under EPA's Antidegradation Policy,

stipulating that states may allow some limited activities that result in temporary and short-term changes to water quality, but such changes should not adversely affect existing uses or alter the essential character or special uses for which the water was designated an ONRW. The EPA interprets this provision to mean no new or increased discharges to ONRWs and no new or increased discharge that would result in lower water quality.

SAFE DRINKING WATER ACT

The Safe Drinking Water Act (SDWA) is the principal federal law (Code of Federal Regulations Title 40 Part 41) in the U.S. intended to ensure safe drinking water for the public. Pursuant to the SDWA, the EPA is required to establish National Primary Drinking Water Regulations (NPDWRs) for contaminants that may cause adverse public health effects. EPA sets standards for drinking water quality and provides oversight of all states, localities, and water suppliers that implement those standards. The SDWA applies to every public water system in the U.S.

Also, in response to this comment, Section 5.6, Hydrology and Water Quality, on page 5.6-6, the following regulatory information is added after the bullets at the top of the page:

- ▲ recreation not involving contact with the water;
- ▲ recreation involving contact with the water;
- ▲ propagation of aquatic life, including a coldwater fishery;
- ▲ municipal or domestic supply, or both; and
- ▲ water of extraordinary ecological or aesthetic value.

In addition, the Bureau of Safe Drinking Water, another branch of NDEP, has the duty to protect the public health of the citizens, tourists and visitors to the State by assuring the public water systems provide safe and reliable drinking water. Nevada's Safe Drinking Water Program regulates public water systems using a combination of State regulations and the National Primary Drinking Water Regulations (NPDWR) established at the federal level. EPA has granted the NDEP primary enforcement responsibility for the NPDWR. In order to maintain primary enforcement responsibility, the NDEP must adopt regulations that are at least as stringent as new or amended federal regulations. Public water systems are defined in Nevada Revised Statute (NRS) 445A.235 to include a "system, regardless of ownership, that provides the public with water for human consumption through pipes or other constructed conveyances, if the system has 15 or more service connections, or regularly serves 25 or more persons. In accordance with NRS 445A.855, NDEP has adopted primary and secondary standards for drinking water. Nevada Administrative Code (NAC) 445A.454 describes the monitoring and analysis requirements overseen by the Bureau of Safe Drinking Water to meet the primary drinking water standards. Any modifications to a water system, whether it be waterlines, treatment, or pump stations, is a water project that requires plan review by the Bureau of Safe Drinking Water in accordance with NAC 445A.6669. NAC 445A.66615 requires that the water system "ensure a reliable supply of water" during any such modifications.


Theresa Avance

From: Skip Canfield <scanfield@lands.nv.gov>
Sent: Thursday, June 14, 2012 11:01 AM
To: amber.giffin@ascentenvinc.com; nanette.hansel@ascentenvironmental.com; Theresa Avance
Cc: Skip Canfield
Subject: State Agency Comments E2012-209 DEIS Edgewood Lodge and Golf Course
Attachments: E2012-209 NDOT.pdf; E2012-209 -NDWR DEIS Edgewood Lodge and Golf Course.pdf; E2012-209 SHPO.pdf

Amber and Nanette:

The Nevada State Clearinghouse received the attached comments and the comments below regarding the DEIS for the Edgewood Lodge and Golf Course.

1. An application and detailed site plan will need to be submitted to the Nevada Division of State Lands prior to any construction of the new proposed multiple use pier and/or demolition of the current 'Pruett pier'.
2. The Nevada Land Bank may be interested in participating with any portion of the project slated to remove coverage in order for it to be permanently retired, or, would be interested in purchasing any previously banked, restored coverage.

Skip Canfield
Nevada State Clearinghouse
State Land Use Planning Agency

Nevada Division of State Lands
Department of Conservation and Natural Resources
901 South Stewart Street, Suite 5003
Carson City, NV 89701
775-684-2723
<http://clearinghouse.nv.gov>
www.lands.nv.gov

S5-1

S5-2

Response S5	Nevada Division of State Lands Skip Canfield, Nevada State Clearinghouse, June 14, 2012
S5-1	The project applicant intends to submit a permit application and detailed site plan to the Nevada Division of State Lands prior to pier relocation and reconstruction, as shown in Table 2-1 on pages 2-2 and 2-3 of the Draft EIS.
S5-2	The comment notes that the Nevada Land Bank may be interested in participating with any portion of the project that would remove coverage for permanent retirement, and expresses interest in purchasing any previously banked restored coverage. This comment does not address the adequacy of the Draft EIS. This comment is acknowledged and will be considered by the project applicant in addressing coverage retirement and banking options should the project be approved.


S6**Skip Canfield**

From: Rebecca Palmer
Sent: Wednesday, May 30, 2012 2:22 PM
To: Skip Canfield
Cc: Karyn de Dufour; Elyse Jolly
Subject: RE: Nevada State Clearinghouse Notice E2012-209

The SHPO has reviewed the subject document. This office supports the draft EIS as written and does not suggest any changes at this time. However, the SHPO notes that the entire cultural resources inventory report was incorporated into the Appendices that are available for public inspection. This document should have been redacted to remove explicit references to site locations prior to its incorporation into a public record. The publication of such sensitive information could be viewed as violation of the Archaeological Resource Protection Act (if federal lands were part of the literature search for this undertaking) and if this becomes a federal undertaking could be viewed as inappropriate under Section 106 of the National Historic Preservation Act. Your consultant should have provided guidance about what should be redacted prior to publication. The SHPO recommends that at this time the document be removed from the public record.

At this time, the project has not been identified as a federal undertaking. However, if this is determined to be a federal undertaking requiring compliance with Section 106 of the National Historic Preservation Act, the SHPO looks forward to receiving the appropriate federal agency's finding of effect.

Rebecca Lynn Palmer
Deputy Historic Preservation Officer
901 South Stewart Street, Suite 5004
Carson City NV 89701
Phone (775) 684-3443
Fax (775) 684-3442

Please note, my email is rlpalmer@shpo.nv.gov

S6-1

Response S6	State Historic Preservation Office Rebecca Palmer, Deputy Historic Preservation Officer, May 30, 2012
S6-1	<p>The commenter supports the Draft EIS as written and does not recommend any changes, except in noting that the cultural resources inventory report should have been excluded from the Draft EIS appendix materials. The confidential maps that were appended to the full Cultural Resources Inventory Report (Appendix I of the Draft EIS) had been redacted from the publically available Draft EIS. In response to this comment, the text of the Cultural Resources Inventory Report (Appendix I of the Draft EIS) has been removed from TRPA's website. We apologize for this error.</p>

2.4.2 LOCAL AGENCIES

L1



City of South Lake Tahoe
"making a positive difference now"

June 28, 2012

Theresa Avance, AICP
 Senior Planner
 Tahoe Regional Planning Agency
 P.O. Box 5310
 Stateline, NV 89449

Dear Ms. Avance,

The City of South Lake Tahoe supports the development of the Edgewood Lodge project as described in Alternative 1 of the Environmental Impact Statement (EIS). The City has partnered with Edgewood Companies in the compilation of Tourist Accommodation Units (TAUs) for the project. The majority of TAUs transferred to the site from within the City limits were associated with projects that have resulted in or are planned to result in significant environmental, social, and economic benefit. These benefits, along with the undeniable benefits of the Edgewood Lodge project itself, comprehensively contribute to the goal of environmental redevelopment in the South Shore area.

With full support for the project from the City, I respectfully submit a single comment on the Edgewood Lodge Project EIS. The traffic and circulation analysis includes a reduction in vehicle trips due to pedestrian, bicycle, and shuttle travel to and from the site with the assumption that some pedestrian traffic will come from the Stateline core area. The analysis should consider whether there is adequate pedestrian facilities between the Lodge site and Stateline core amenities located along Hwy 50 to justify the assumption.

If you have any questions, please feel free to contact me.

Sincerely,

Hilary Roverud
 Director of Development Services
 (530) 542-6024

L1-1

L1-2

Community Development Department • Planning Division • 1052 Tata Lane • South Lake Tahoe, CA 96150-6251 • (530) 542-6020 • (530) 541-7524 FAX

Response L1	City of South Lake Tahoe Hilary Roverud, Director of Development Services, June 28, 2012
L1-1	<p>The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.</p>
L1-2	<p>The commenter recommends considering whether there are adequate pedestrian facilities between the lodge site and the Stateline casino corridor amenities along U.S. 50 to justify the reduction in vehicle trips taken in the Draft EIS related to pedestrian, bicycle, and shuttle travel to and from the site. Page 5.10-23 of the Draft EIS describes pedestrian access to the site from the Stateline casino corridor. Lake Parkway is currently served by a sidewalk on the north side of the roadway between the site entrance road and U.S. 50 to the east. A signalized and striped crossing of U.S. 50 is provided at the U.S. 50/Lake Parkway intersection. The proposed project includes an on-demand shuttle service between the project site and the casino corridor. A non-motorized access pathway would be provided parallel to but separated from the site access roadway for bicycle and pedestrian use. The fact that there are existing and proposed facilities between the lodge site and the Stateline casino corridor for pedestrians and bicyclists supports the reductions accounted for in Table 5.10-4 of the Draft EIS.</p> <p>Furthermore, the proposed first segment of the South Demonstration Project, a shared-use path project proposed by Douglas County and the Tahoe Transportation District that would connect the Stateline casino corridor to Round Hill Pines Beach, if constructed, would create a new crossing near the Harvey's driveway entrance along Lake Parkway, near the state line.</p> <p>Also, Mitigation Measure 5.10.1-4 in the Draft EIS includes two options to ensure safe and adequate access from the proposed off-site employee parking lot on parcel 1318-27-001-012, across Lake Parkway from the project site. One of the options (Mitigation Measure 5.10.1-4a) includes construction of a crosswalk constructed in accordance with Douglas County design standards, as well as an ADA-accessible path along the Edgewood frontage on Lake Parkway between the off-site lot and the Edgewood driveway.</p> <p>If either the South Demonstration Project or Mitigation Measure 5.10.1-4a were implemented, these components would enhance the pedestrian and bicycle access that is already available.</p>

L2



BOARD OF COMMISSIONERS

1594 Esmeralda Avenue, Minden, Nevada 89423

Steve Mokrohisky
COUNTY MANAGER
775-782-9821

COMMISSIONERS:
Lee Bonner, CHAIRMAN
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Doug Johnson
Greg Lynn

June 26, 2012

Norma Santiago, Chair
Governing Board
Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89449

RECEIVED
JUN 26 2012
TAHOE REGIONAL
PLANNING AGENCY

RE: Edgewood Lodge and Golf Course Improvement Project Draft Environmental Impact Statement

Dear Madame Chair:

On behalf of Douglas County, thank you for the opportunity to comment on the Edgewood Lodge and Golf Course Improvement Project Draft Environmental Impact Statement (EIS). Based on a review of the Draft EIS, the County has found the proposed project (Alternative 1A) to be consistent with the goals and policies in the recently adopted Douglas County 2011 Master Plan, Strategic Plan (FY 11/12 – 13/14), and Economic Vitality Strategy and Action Plan, as well as the Lake Tahoe Basin Prosperity Plan. The proposed project also includes a number of environmental enhancement projects that will help to further the objectives of the Lake Tahoe Total Maximum Daily Load (TMDL) Program (adopted August 2011), which focuses on reducing the amount of pollutants of concern, particularly fine sediment from roads and town centers, from entering Lake Tahoe.

The proposed project will also benefit Douglas County and the Tahoe Regional Planning Agency (TRPA) in that it will further the attainment of soil conservation/stream environment zone (SEZ), fisheries, and scenic thresholds, through the implementation of the following Environmental Improvement Program (EIP) and Threshold Improvement Projects on or in the vicinity of the Edgewood Tahoe Golf Course:

Environmental Improvement Program (EIP) Projects

- EIP Project 412: Edgewood Creek – Stateline Community Plan Restoration Project
- EIP Project 413: Edgewood Creek – Golf Course Project
- EIP Project 414: Edgewood Creek – Stateline Avenue SEZ Restoration Project
- EIP Project 506: Scenic Shore Unit #30 Edgewood Improvement Project (partially implemented)
- EIP Project 656: Edgewood Creek 1st Reach Phase 1 – Stream Habitat Restoration Project
- EIP Project 980: Protection of Tahoe Yellow Cress Mouth of Edgewood Creek Project

Mailing Address: P.O. Box 218, Minden, NV 89423

L2-1

Edgewood Draft EIS
Page 2 of 2

Threshold Improvement Projects

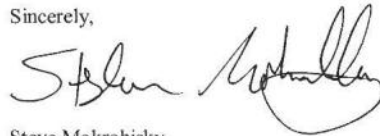
- 1: Edgewood Lodge Stormwater Approach – Best Management Practices (BMPs) for the lodge complex
- 2: Water Quality Improvements to the Stateline Stormwater Association Pond System
- 3: Edgewood Creek Improvements
- 4: Friday's Station Dam Rehabilitation
- 5: Edgewood Tahoe Golf Course Fertilizer Management Plan

Overall, it is anticipated that the water quality improvement projects will result in approximately 500,000 pounds of sediment and 50,000 pounds of fine sediment, as well as nitrogen and phosphorus, being captured on an annual basis and prevented from entering Lake Tahoe.

As demonstrated by the proposed Edgewood Lodge and Golf Course Improvement Project, as well as the Beach Club on Lake Tahoe and Sierra Colina Village Projects, investment by the private sector in water quality improvement projects can significantly benefit the Lake Tahoe environment. Investment by the private sector in water quality improvement projects also reduces the cost of TMDL implementation for the public sector, which has been an expensive proposition for local jurisdictions during the current economic climate. For these reasons, Douglas County is committed to continuing to foster public-private partnerships and support efforts by the private sector, such as Edgewood Companies, to implement projects that will help to protect the clarity of Lake Tahoe.

Douglas County appreciates your consideration of these comments and hopes that the TRPA Governing Board moves forward with certifying the Final EIS and approving the proposed project later this year. If you have any questions, please contact me at (775) 782-9821 or smokrohisky@co.douglas.nv.us.

Sincerely,



Steve Mokrohisky
Douglas County Manager

cc: Joanne Marchetta, TRPA Executive Director
John Hester, AICP, TRPA Planning Manager
Theresa Avance, AICP, TRPA Senior Planner
Mahmood Azad, PE, Principal Engineer/Fisheries, Nevada Tahoe Conservation District
Brandon Hill, Project Manager, Real Estate Edgewood Companies

L2-1
cont'd

Response L2	Douglas County Board of Commissioners Steve Mokrohisky, Douglas County Manager, June 26, 2012
L2-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

2.4.3 LOCAL UTILITIES, SERVICE PROVIDERS, AND QUASI-GOVERNMENTAL ENTITIES

E1

Theresa Avance

From: Jesus Martinez <Jesus.Martinez@swgas.com>
Sent: Thursday, June 28, 2012 11:20 AM
To: Theresa Avance
Subject: Edgewood Lodge Golf Course Improvement
Attachments: img-628132317-0001.pdf

Theresa,
 Paiute Pipeline Company has two natural gas high pressure pipes (8" and 6") running along US HWY 50 (from SR-207 to Lake Parkway ending at the Stateline), and they could be in conflict with your project.
 I have attached a map showing the pipes location and I hope that the scope of work would avoid our pipelines.
 Please be aware that any relocation needs from 6 to 9 months for FERC permitting and Paiute will be reimbursed.
 Don't hesitate to call me if you need additional information.
 Thank you.

E1-1

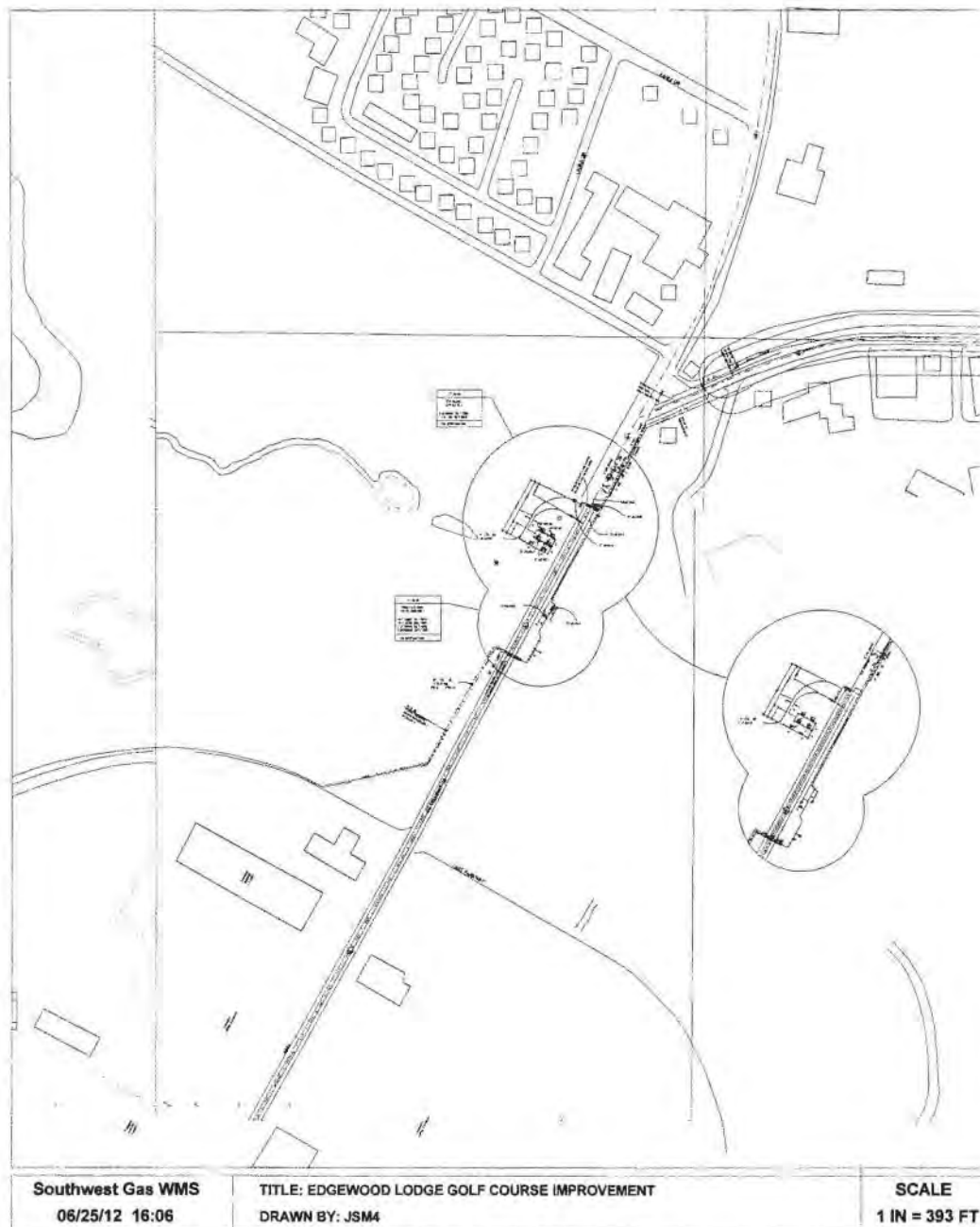


Jesus Martinez
 Transmission Engineer
 Paiute Pipeline Company
 PO Box 1190 | 29A-580 | Carson City, NV 89702-1190
 office 775.887.2862 | fax 775.882.4346 | cell 775.722.4215
 email Jesus.Martinez@swgas.com | web www.paiutepipeline.com

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Thank you for your cooperation.



Response E1	Paiute Pipeline Company Jesus Martinez, Transmission Engineer, June 28, 2012
E1-1	<p>The two high pressure natural gas pipelines referenced by the commenter are located along U.S. 50, at a substantial distance from the proposed lodge complex area improvements in the southern part of the project site. Improvements associated with proposed Threshold Improvement Project C, including improvements to Edgewood Creek, would be the closest improvements to the existing natural gas lines. It is not anticipated that any component of the project would interfere with or cause the need for relocation of these lines. If TRPA approves the proposed project, the project applicant would begin detailed plans and specifications of project features. If possible, utility infrastructure, including the commenter's two natural gas pipelines along U.S. 50 would be avoided. In the case that avoidance is not possible, the project applicant would coordinate with Paiute Pipeline Company to ensure that impacts are minimized to the greatest degree possible and that all permitting and relocation fees incurred by the Company would be reimbursed.</p>

E2

TAHOE DOUGLAS FIRE PROTECTION DISTRICT

Ben Sharit, Fire Chief
Mark Noyak, Assistant Chief
Eric Guevin, Fire Marshal



Steve Seibel, Chairman
Ann Grant, Vice Chairman
Brad Devron, Trustee
Kevin Kjet, Trustee
Mike Bradford, Trustee

June 25, 2012

Theresa Avance, AICP
Senior Planning
Tahoe Regional Planning Agency
PO Box 5310

RECEIVED

JUN 28 2012

Transmitted by email [tavance@trpa.org]

TAHOE REGIONAL
PLANNING AGENCY

Dear Ms. Avance,

The Tahoe Douglas Fire Protection District (Fire District) has reviewed the Draft Environmental Impact Statement for the Edgewood Lodge and Improvement Project. The Fire District is confident that the project can be implemented in a manner that is beneficial to the environment and the community, while providing for public safety. However, the Fire District has identified several deficiencies in the project in the area of:

- 1) Fire Apparatus Access Roads
- 2) Fire Protection Water Supplies
- 3) Fire Protection Systems

The Fire District has been working with the project proponent to identify mitigations for these deficiencies. The exact form of these mitigations has not been finalized. We are proceeding forward with continued dialogue and a mutual agreement to provide for the International Fire Code requirements through design development and final construction plan review. Fire Water Flows, delivery systems and Fire Department Access Roads are concerns that are being addressed as the development progresses through the stages.

Please see attached memorandum from Brandon Hill, Project Manager to the Fire District documenting the working relationship and established requirement options for conceptual site approval and EIS review. We respectfully request that the EIS consider the potential need for these measures.

Sincerely,

Eric Guevin
Fire Marshal

P.O. Box 919 – 193 Elks Point Road – Zephyr Cove, Nevada 89448

Phone (775) 588-3591 Fax (775) 588-3046

E2-1

Memorandum

Date: 6/22/2012

Prepared By: Brandon Hill, Project Manager, Edgewood Companies

Prepared for: Eric Guevin, Tahoe Douglas Fire Protection District

CC: Patrick Ramey, Ben Sharit, Lew Feldman, Chris Stetler, Jason Drew

Subject: Edgewood Lodge & Golf Course Improvement Project

Fire Marshall Eric Guevin,

This memorandum has been prepared pursuant to recent meetings held at the Tahoe Douglas Fire Protection District Station in Elks Point, NV. I have included the consolidated notes taken by representatives from Edgewood Companies and Nichols Consulting Engineers.

In addition to the consolidated notes from meetings which took place on May 29th and June 4th, you will also find attached to the same e-mail a revised site plan exhibit. The revised site plan was prepared to address comments discussed May 29th and June 4th. Please review the consolidated meeting minutes that follow as well as the revised site plan. Feel free to provide additional comment on these notes as well as the revised site plan as soon as you are able to.

As we move forward through the design development phase for the Lodge we will continue the dialogue we have started to ensure compliance with applicable fire code provisions.

Best Regards,



Brandon Hill
Project Manager, Real Estate
Edgewood Companies
bhill@edgewoodcompanies.com
775-315-9508

Meeting Date: 05/29/12

Meeting Subject: TDFPD Comments to Edgewood Lodge Draft EIS

Entities Represented: Edgewood Companies and the Tahoe Douglas Fire Protection District

Attendees: Chris Stetler, Jason Drew, Brandon Hill, Patrick Rhomey, Eric Guevin, Ben Sharit

Overview/Background (Brandon Hill)

- 1) Conceptual plans for the Edgewood Lodge and Golf Course Improvement Project were originally submitted to the TDFPD in June of 2008.
- 2) The 2008 TDFPD review was performed by Rick Nicholson, Fire Marshal at the time.
- 3) On behalf of Edgewood Companies, Richard Shaw of Design Workshop was principally involved.
- 4) Of those involved between the project applicant and the TDFPD, only Richard Shaw is still directly involved in the project.
- 5) The 2008 TDFPD review was conducted in accordance with the 2006 International Fire Code.
- 6) The State of Nevada is scheduled to adopt the 2012 IFC in January 2013.
- 7) Final construction documents will be reviewed for conformance with the 2012 International Fire Code.
- 8) Douglas County is required to adopt IFC codes as a minimum standard.

Review of Proposed Site Plan Design

- 1) Expansion of the South Banquet Room of the existing Clubhouse facility
 - a. Since the existing fire flow connection will be lost with the expansion, the establishment of a new fire flow connection directly from the building is critical with the parking lot loss of parking lot.
- 2) Main lodge
 - a. 154 rooms
- 3) Casitas
 - a. 2-4 bedrooms
 - b. 10 total units
- 4) Casitas Access Path
 - a. 2008 12' wide with 3' pervious shoulders on each side. 18' in total width
 - b. Multiple solutions deemed acceptable for stabilization of shoulders.
 - i. Grass Crete
 - ii. Reviting (vertically driven PVC piping)
 - iii. Pervious Asphalt
 - iv. Pervious Concrete
 - v. Pervious Pavers
- 5) Fire flows
 - a. Eric Guevin: 4,000 GPM required
 - b. 8,000 GPM required without sprinkler system
 - c. 50% reduction allowed with fire sprinkler system
- 6) TDFPD comments/questions/concerns (Eric)

- a. Fire flow
 - i. Hydrant placement (max 350' spacing)
 - ii. Road width for hydrants.
 - 1. Need min 26' width.
 - 2. Need to allow for two fire vehicles to pass each other.
 - b. Casita pathway
 - i. Likely to need pullouts along Casita Path at hydrant locations.
 - ii. TDFPD would also like turn around at south end
 - iii. Roads/Paths must be able withstand 75,000 lbs
 - iv. Casita path must be 20' wide (minimum)
 - v. 12' paved area with 3' permeable material on both sides capable of withstanding 75,000 lbs loading will be acceptable
 - c. Fire suppression Flow to the lake side of the south wing of Main Lodge structure
 - i. One option is for the Casita Path to make a bridge over the pond wide enough and strong enough to support Fire Truck.
 - ii. Bridge over pond could also function as a hammerhead turnaround
 - iii. Even with this hammerhead in place, TDFPD would want at least one turnout off the Casita Path at a location south of the Casitas.
 - iv. Potentially, the pullout could be aligned with the wide end of a path that connects a Casita to the Casita Path.
 - v. An option to serve fire suppression flow to the lake side of the south wing of the main Lodge may be to provide standpipes
 - vi. The standpipes would be served by a fire department connection on the Casita Path and/or the driveway cul-de-sac near the Clubhouse – pumper trucks would connect to the fire department connection, and then hose connections would be made at the standpipes.
 - vii. Access to the standpipes would have to be maintained accessible throughout the year.
 - d. Section C 105 related to fire hydrants footnote C may allow for distance greater than 350' between hydrants –
 - i. TDFPD may permit along the main driveway in to the project.
 - ii. Possible idea thrown out about TDFPD mini pumper
 - 1. Would be purchased and maintained by Edgewood
 - 2. May be possible to get one small enough to travel on golf cart paths
 - 3. Edgewood: How much would it cost? Not sure if mii pumper is a feasible solution.
- 7) Challenges
- a. Tree Removal
 - i. The project is limited by TRPA rules on how many trees it can remove
 - ii. This limit is already being bumped up against
 - b. Impervious Coverage
 - i. Strict TRPA limits on allowable coverage are already being bumped up against.
 - ii. A wider shoulder, hydrant turnouts and a turnaround will only exacerbate this situation.
- 8) Action Items
- a. Edgewood (Brandon)

- i. Follow up with Richard Shaw of Design Workshop
 - 1. Are there written notes from the 2008 review process and negotiations that took place with Rick Nicholson of the TDFPD?
 - 2. How was the concern about fire suppression flow to lake side of the south wing addressed in 2008?
 - 3. Is there any precedent for the TRPA not treating pervious stabilized surfaces as coverage.
- b. TDFPD (Eric Guevin)
 - i. Will stand pipes along the lake side of the south wing be sufficient for fire suppression?
 - ii. Will 3' wide stabilized shoulders be sufficient considering 12' wide cart path?
 - iii. Follow-up with Rick Nicholson to understand possible solution to concern about fire suppression service to lake side of south wing.

2nd Meeting Date: 06/04/12

Meeting Subject: TDFPD Comments on Edgewood Lodge Draft EIS

Entities Represented: Edgewood Companies and the Tahoe Douglas Fire Protection District

Attendees: Brandon Hill, Chris Stetler, Jason Drew, Eric Guevin, Ben Sharit

1) Follow-up from 5/29/2012 Meeting

a. Eric Guevin talked with Rick Nicholson

i. Site Plan is modified from that reviewed by TDFPD in 2008

1. Unit count reduced to 194, down from 235 units
2. South Wing rotated westward toward Lake
3. Water feature enlarged between pond and Casita cart path
4. Spa Annex building eliminated
5. Small Lodge Building eliminated
6. Number of Casita structures increased to 10 from 3
7. Were plans resubmitted to TDFPD after changes?

ii. South wing fire suppression

1. Insufficient access to east side of south wing of main Lodge Building
2. TDFPD okay with standpipes on backside (west side of Lodge building in lieu of fire access road)
3. Fire access pathway needed along east side of Lodge South Wing
4. TDFPD: need to be able to bring ladder truck along entire frontage of main lodge building.
5. Jason Drew: Does fire access lane along south wing need to be a road or can it be a stabilized pedestrian zone surface?
6. As long as it is identified as an emergency fire access lane and is kept free and clear of furnishings, equipment and cars, it can have dual purpose as pedestrian/cart path area.

iii. Casita Pathway

1. 12' wide casita pathway with 3' stabilized shoulders on each side was approved by Rick Nicholson in 2008 and will be acceptable going forward as a dedicated fire access through to Lake Parkway.
2. If a fire access lane is provided along the south wing of the main Lodge Building, the casita path on the east side of the water feature will not require the additional shoulder stabilization.
3. All fire lane surfaces must meet loading requirements
 - a. What are the outrigger point loading requirements?
4. All fire lanes (including shoulders) must be kept free and clear during all seasons
 - a. Snow clearance during winter
5. Edges of 18' wide fire access lanes must be delineated

2) Recap (Brandon):

- a. Design fire access lane along east side of Main Lodge Building south wing (west side of pond)
- b. Entire east side of Lodge to have a fire access lane along it
- c. Fire access lane to be a minimum of 18' wide
- d. Hydrant turnout locations to be a minimum of 26' wide
- e. Casita path east of water feature to stay 12' wide but will no longer require stabilized shoulders.
- f. Change eliminates the need to have a fire truck/engine pullout between Lodge arrival circle and intersection of Casita Path and fire access lane south of Main Lodge Building access road
- g. As a result of the circular arrival sequence, the dedicated fire lane along south wing, and the 12' wide casita pathway, no dedicated fire truck / Engine truck turnaround required.
- h. Casita Access path south of intersection with dedicated fire lane must have stabilized shoulders to allow a stabilized width of 18'.
- i. West side of lodge south wing is adequately protected by standpipes
- j. Pull out to provide 26' width still required at all hydrant locations
- k. Summary of TDFPD/Edgewood meetings should be provided with comments to the Lodge EIS project

3) Action Items

- a. Edgewood (Brandon Hill)
 - i. Provide copy of consolidated meeting minute notes to the group
 - ii. Work with Design Workshop to revise site plan to accommodate TDFPD comments and Edgewood concessions
 - iii. Work with Design Workshop to assess impacts of changes on TRPA tree removal limits and coverage limitations
 - iv. Provide rough draft of site plan revisions to the TDFPD for additional review and conceptual approval
- b. TDFPD (Eric Guevin)
 - i. Research and inform NCE and Edgewood as to outrigger point loading requirements for fire engines.
 - ii. Prepare comments to be submitted to the TRPA which include:
 - 1. Summary of meetings between EC and TDFPD
 - 2. Comments & Agreed to Resolutions
 - 3. Conceptually approved site plan subject to final construction document review



Response E2	Tahoe Douglas Fire Protection District Eric Guevin, Fire Marshall, June 25, 2012
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E2-1

The commenter identifies several aspects of the project design that need further definition and refinement, including fire apparatus access roads, fire protection water supplies, and fire protection systems. The commenter also acknowledges collaboration with the project applicant on design concerns and describes that there is a mutual agreement between the two to ensure that Internal Fire Code requirements are achieved through refinements to the project design as the proposed development progresses through latter design phases. Based on discussions with TDFPD staff, fire flow requirements would be 4,000 gpm at the site. The District has indicated that the final design plans would need to address TDFPD fire hydrant spacing and access requirements, turnaround areas, minimum widths for roadways, minimum loading requirements on roadways, and access road clearing and maintenance, among others.

As described on page 5.14-15 of the Draft EIS, the Tahoe Douglas Fire Protection District (TDFPD) granted preliminary plan check approval in June 2008. At that time (and at present), the 2006 International Fire Code (IFC) provisions were in effect. The state of Nevada is scheduled to adopt the 2012 IFC in January 2013. If the project is approved by TRPA, the final design plans and construction documents would be reviewed for conformance with the 2012 IFC, which would be adopted by Douglas County. Conformance with the 2012 IFC and TDFPD approval would be required by Douglas County as part of the Building Permit process and prior to building occupancy.

The required refinements to the site plan (Exhibit 3-7 of the Draft EIS) to address TDFPD requirements would result in incremental changes to land coverage (Table 3-4 of the Draft EIS) and the number of trees to be removed (Table 3-5 of the Draft EIS). Prior to TRPA permit acknowledgement, TRPA would verify that refinements to the site plan would remain consistent with provisions of Chapter 30 of the TRPA Code related to land coverage and tree removal would be in accordance with the provisions of Chapters 33 and 61 of the TRPA code related to tree removal.

E3



**Tahoe Water
Suppliers
Association**
Protect the Source

1220 Sweetwater Road
Incline Village, Nevada, 89451
775-832-1212

TWSA Members:

Cave Rock Water System
Edgewood Water Company
Glenbrook Water Company
Incline Village GID
Kingsbury GID
Lakeside Park Association
North Tahoe PUD
Round Hill GID
Skyland Water Company
South Tahoe PUD
Tahoe City PUD
Zephyr Water Utility

1

June 27, 2012

To: Ms. Theresa Avance, Tahoe Regional Planning Agency

**RE: Comment regarding the Edgewood Lodge and Golf Course Improvement Project
(TRPA File # ENVP2008-0002)**

On June 27, 2012, Mr. Brandon Hill, Project Manager for the above referenced project, contacted Madonna Dunbar (E.D. TWSA) via telephone, in order to provide additional information to draft comments originally developed by the Tahoe Water Suppliers Association (TWSA). From that conversation, some of the draft comment/concerns of the water providers were addressed:

- Mr. Hill agreed that a specific run of the Risk Assessment Model (referenced below) would reinforce the project's position that there should be no microbial contaminant increase from the new beach area. He agreed that the Edgewood Water Company engineer should be able to work with TWSA staff to run the model specific to the project, and that that information could be included in the final EIS and shared with the water providers. *(Item #1 below)*
- TWSA originally had concerns that the KGID intake will be affected by the project. This had been alleviated by specific information that the construction site of the new lodge is 3,200 feet from the KGID intake. *This original comment was removed from reference below.*
- Mr. Hill is researching the availability of the pier spill response plan *(Item #3 below)* to be shared with the TWSA.

Below are modified comments we still wish to be incorporated in the record of the review process. These comments are specific to potential impacts to municipal drinking water quality.

Impact 5.6.1-8 Degradation of Source Water Quality from Boating Activity and Increased Beach Recreation.

Item # 1:

Alternative 1 would include the relocation and extension of the existing pier and would provide new public beach access. The proposed public beach access is not intended to accommodate a large number of people, and Edgewood Companies proposes to adaptively manage public access by potentially setting a limit to the number of people that may use the beach during peak periods.

E3-1

E3-2

E3-3

E3-4

2

TWSA Comments:

- 1) Microbial contamination from human water contact is a main concern for drinking water quality. The Edgewood Water Company maintains a public water system which is in the process of upgrading to meet US EPA Long Term 2 (LT2) compliance for filtration exempt systems. Filtration exemption compliance of this type requires: submission of an annual watershed control program report, a history of regulatory compliance on turbidity and microbial contaminants, a history of the absence of water borne diseases, and other factors.
- 2) The US Army Corp of Engineers commissioned a Risk Analysis Study and Simplified Pollutant Transport Modeling Tool in 2008 for the TWSA members. This tool can be used to analyze potential risk from human-water contact. We request that the project proponent use this tool to provide a scientific estimate of the increased contamination potential linked to the new beach area next to the intake. TWSA staff can provide the tool and contact information for using the model. This information should be included in the EIS.
- 3) What mechanisms will be used to limit the beach access? The daily beach access limit (number of persons) is not defined. Delineation of the access control methods needs to be specified. Increased human water recreation on the beach, and from nearby boating activity has the potential for increasing microbial contamination near the intake.

E3-4
cont'd**Item # 2:**

Furthermore, the Edgewood Water Company primary water supply intake line extends over 2,000 feet from the beach, and its backup line is located over 700 feet from the beach. These distances from the shoreline, combined with the depths of the intakes is sufficient to protect source water quality.

TWSA comments:

- 1) This statement should be validated by a run of the Risk Assessment Model Tool.

Item # 3:

Projects within 600 feet of a drinking water source identified by TRPA require special consideration as described in Section 60.3 of the TRPA Code and are afforded protection under the Lake Tahoe Source Water Protection Program. There are three protected drinking water sources within 600 feet of the project area: the Edgewood Water Company (EWC) intake line (00703003I11) that extends into Lake Tahoe from a location north of the existing lakefront residences; and two active wells (02903603W11 and 02905101W11) south of the project area boundary near golf hole 9 in California (TRPA 2000). Prior to issuance of a TRPA permit, the project applicant would be required to comply with the source water protection provisions contained in Section 60.3.3.D of the TRPA Code.

60.3. D. Review of Proposed Possible Contaminating Activities Located in Source Water Protection Zones: Proposed uses determined by TRPA to be projects that are identified as a Possible Contaminating Activity, with a project area located in a source water protection zone, shall not be approved unless TRPA finds that: 1. The project complies with the requirements to install BMPs as set forth in subsection 60.4.3; 2. TRPA has solicited comments from the operator/owner of the source water, and the department of environmental health with jurisdiction over the source water, and all such comments received

E3-5

3

were considered by TRPA prior to action being taken on the proposed project; 3. A spill control plan is submitted to TRPA for review and approval. The plan shall contain the following elements: a. Disclosure element describing the types, quantities, and storage locations of contaminants commonly handled as part of the proposed project; b. Contaminant handling and spill prevention element; c. Spill reporting element, including a list of affected agencies to be contacted in the event of a spill; d. Spill recovery element; and e. Spill clean-up element. Submittal of a spill control plan may be waived provided a state or local agency with jurisdiction over the subject source water provides a written statement to TRPA that a plan containing the above elements remains on file with that agency, or TRPA staff determines, at its discretion, that requiring a spill control plan would not result in significant additional protection of the source water.

E3-5
cont'd

TWSA comments:

- 1) The requirements for a spill response plan for the pier have not been detailed as required in TRPA Code of Ordinances (60.3. Source Water Protection -Section D.3). Mr. Hill is in the process of gathering this information.
- 2) Public comment from the affected water providers (Edgewood) was not solicited separately by TRPA (as required in 60.3. Source Water Protection -Section D.2); but is hereby delivered.

Impact 5.6.1-7

Degradation of Water Quality During Pier Relocation and Extension.

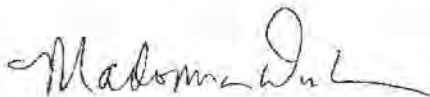
Alternative 1 includes removal of the existing pier, and relocation and construction of a new pier. A total of 14 pilings are proposed for pier construction with parallel pilings on fixed pier sections (four per section) and a single piling for each floating section. Pier installation would result in minor disturbance of the lake bottom and minimal resuspension of sediments, nutrients, and other pollutants. The minimal disturbance to the lake bottom associated with Alternative 1 would not adversely affect Lake Tahoe water quality or cause established water quality standards to be exceeded. Therefore, this impact is considered less than significant.

TWSA comments:

- 1) If the intake is offline during this entire construction process, no mitigation is requested. However, if the intake is in service during lakebed construction with the potential of increased turbidity, a communication plan with the Edgewood Water Company and additional turbidity monitoring between the site and the intake is requested.

E3-6

Respectfully submitted on behalf of the Tahoe Water Suppliers Association Board,



Madonna Dunbar
Executive Director, Tahoe Water Suppliers Association

Response E3	Tahoe Water Suppliers Association Madonna Dunbar, Executive Director, June 27, 2012
E3-1	See response to comment S4-2.
E3-2	This comment is noted. See also response to comment S4-3.
E3-3	<p>The commenter requests information on the pier spill response plan. In response to this comment, the text of Section 5.6, Hydrology and Water Quality, page 5.6-31, the following paragraph describing specific requirements of the spill control plan is added before the last paragraph on the page as follows:</p> <p><u>Specifically, the project applicant is required to prepare a spill control plan for TRPA review and approval. In accordance with Section 60.3.3.D(3), the plan shall include the following elements:</u></p> <ul style="list-style-type: none"> a. <u>Disclosure element describing the types, quantities, and storage locations of contaminants commonly handled as part of the proposed project;</u> b. <u>Contaminant handling and spill prevention element;</u> c. <u>Spill reporting element, including a list of affected agencies to be contacted in the event of a spill;</u> d. <u>Spill recovery element; and</u> e. <u>Spill clean-up element.</u> <p>For the well sites south of the site, the proposed project would not bring fertilized turf areas closer than they are today and therefore is not considered to create a possible contaminating activity. The project is expected to result in reduced fertilizer application (Impact 5.3.1-10) at levels that could improve groundwater conditions. For these reasons, the project would not be expected to cause degradation of these drinking water sources.</p>
E3-4	<p>The commenter identifies microbial contamination from human water contact as a concern for drinking water quality and requests use of the Lake Tahoe Transport Model to analyze potential risk from human-water contact and to provide a scientific estimate of the increased contamination potential linked to the new beach area next to the intake. This comment also requests information on how beach access would be limited, and an explanation of the daily beach access limit.</p> <p>With respect to beach access, as described on page 5.6-31 of the Draft EIS, the project applicant proposes to take an adaptive management approach to beach management through such measures as limiting access during peak periods (e.g., beach goers may be provided a limited number of access passes, controlled via the gate house, during peak periods. The project applicant has the ability to manage access to the beach area, as access to the site would be restricted to the main access driveway from Lake Parkway, which directs users through the gate house area. A specific limit on number of beach goers has not been identified. However, Section 5.4, Recreation, of the Draft EIS provides an estimate of the number of beach users</p>

anticipated at a given time using the design capacity from TRPA's 2005 Recreation Assessment. Assuming one person per 50 square feet of beach space for an urban beach recreation area, approximately 310 people could be accommodated during high lake stands and 530 people during average lake stands. The beach at Edgewood is narrow, estimated at 27 feet wide at high lake level. Because the lodge is proposed as a high-end resort, it would be managed in a manner that maintains a premier experience for its lodge guests, while satisfying the plan area statement requirements to provide public beach access.

Similar comments regarding microbial contamination and use of the Lake Tahoe Transport Model were submitted by the NDEP Bureau of Safe Drinking Water. See response to comment S4-2.

E3-5 See response to comment E3-3. The comment regarding soliciting input from Edgewood Water Company in accordance with Section 60.3.3.D(2) is noted. We appreciate the Tahoe Water Suppliers Association's, of which Edgewood Water Company is a member, input on the Draft EIS.

E3-6 This comment addresses source water quality protection from increased turbidity during construction. With the proposed project, the pier would be reconstructed at a location approximately 1,200 feet north of its current location. The mouth of the EWC primary water supply intake is located over 2,000 feet from the closest point of the proposed pier and at a depth of 34 feet. As described on pages 5.6-28 and 5.6-30 of the Draft EIS, construction staging for the pier removal and reconstruction would be provided by a barge on the lake. In addition, a turbidity curtain or other approved technology for containment of re-suspended sediment would be used at all times during construction of the floating pier. This is a standard BMP (208 Plan, Volume II, BMP-72, Best Management Practices). A turbidity curtain is a floating barrier consisting of relatively impervious fabric, used to prevent fine and coarse suspended sediment transport away from areas of water-based construction activities, in this case the removal and driving of the pier piles. In response to this comment, the text of Section 5.6, Hydrology and Water Quality, page 5.6-30, last paragraph is revised to incorporate additional commitments by the project applicant:

Construction staging for the pier relocation would be provided by a barge on the lake. In addition, a turbidity curtain or other approved technology for containment of re-suspended sediment would be used at all times during construction to prevent earthen materials re-suspended as a result of pier construction from being transported to adjacent lake waters. As a permit condition, TRPA would require that the project applicant install caissons around proposed pilings, a turbidity screen around the entire construction site (in the water), and/or other appropriate measures as proposed by the project applicant and as approved by TRPA. These measures would remain in place until project completion and upon satisfactory inspection by TRPA to ensure that all suspended materials have settled. A turbidity curtain is a floating barrier consisting of relatively impervious fabric, used to prevent fine and coarse suspended sediment transport away from areas of water-based construction activities, in this case the driving of the pier piles.

Additionally, following further design development for the proposed pier and prior to TRPA permit acknowledgement, the project applicant would develop a communications plan with Edgewood Water Company that would incorporate details regarding pier construction/demolition techniques and a schedule for such activities. The

communications plan with Edgewood Water Company would also assess whether there is the need for additional turbidity monitoring. If additional turbidity monitoring were required and the monitoring revealed an exceedance of established turbidity standards, then the pier construction would cease until that time that appropriate corrective actions were implemented (such as temporarily taking the intake line off line and relying on existing storage volume to serve existing customers, or additional turbidity barriers), as determined by Edgewood Water Company and the project applicant. The project applicant would provide TRPA with documentation of the communications plan with Edgewood Water Company prior to TRPA permit acknowledgement. This impact is considered **less than significant**.

2.4.4 ORGANIZATIONS/BUSINESSES

01

2170 South Avenue
South Lake Tahoe
CA 96150

530-541-3420 TEL
www.bartonhealth.org

June 26, 2012

Theresa Avance, AICP
Senior Planner
Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89449

RE: Edgewood Lodge and Golf Course Improvement Project

Dear Ms. Avance and TRPA Board:

I'm writing this letter in strong support of the Edgewood Lodge Project. After reviewing this project, the environmental impacts and the mitigation proposed by the Edgewood Corporation, I feel strongly that the lodge project will guide future development and redevelopment in the Tahoe Basin.

Our community desperately needs projects similar to the Edgewood Lodge Project to enhance not only the economy, but the natural environment. This project will also improve the tourist's experience while in Lake Tahoe.

Please consider moving this project forward as the benefits are wide reaching in our community, environment, and tourism based economy.

Thank you for your consideration.

Best Regards,

Clint Purvance, M.D., C.P.E.
Chief Medical Officer
Barton Health
2170 South Avenue
South Lake Tahoe, CA 96150
cpurvance@bartonhealth.org
530-543-5934

01-1

taking your health to **new heights**

Response 01	Barton Health Clint Purvance, M.D., C.P.E., Chief Medical Officer, June 26, 2012
O1-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

02



June 18, 2012

2173 South Avenue
South Lake Tahoe
CA 96150

530-541-3420 TEL
www.bartonhealth.org

Theresa Avance, AICP
Senior Planner
Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89449

Re: Edgewood Lodge and Golf Course Improvement Project

Dear Ms. Avance and TRPA Board,

Thank you for the opportunity to comment on the Edgewood Lodge and Golf Course Improvement Project Draft Environmental Impact Statement (EIS). As President and Chief Executive Officer of Barton Health, the largest health provider and one of the largest employer's in the Tahoe Basin, I fully support the Edgewood Lodge and Golf Course Improvement Project. Additionally, I feel that the Draft EIS offers a more than thorough study of the potential adverse impacts the Lodge Project could have. Based on this study, it is clear that the Lodge Project will not harm the environment and will, in fact, in many cases, improve it.

I would also like to take this opportunity to share the reason that I support this project, separate from the EIS process:

- 1) The project will bring jobs to our area which translates to needed benefits for full time residents. (Economic Improvement)
- 2) The project is expected to increase the number and quality of visitors to our area bringing more dollars spent to support area businesses. (Economic Improvement)
- 3) It is in alignment with the Lake Tahoe Prosperity Plan. (Economic, Environmental, Health Improvement)
- 4) The project will provide environmental benefits to Lake Tahoe by reducing coverage in the SEZ, replacing old TAUs with LEED TAUs, creating native wetlands, stabilizing banks and run-off, and reducing sediment into the lake. (Environmental Improvement)
- 5) Increase the access to recreation for the visitor and community (Economic, Environmental and Health Improvement)

Barton Health runs health care practices in near vicinity to the Edgewood project at 155 Hwy 50 at Stateline, Nevada, including Barton Urgent Care, Barton Pediatrics, Barton Rehabilitation, Barton Internal Medicine, and Barton Family Practice. Edgewood has shown that their projects at the golf course compliment the beauty of the lake. The renditions and plans show great benefit to our residents, our visitors, our local businesses and our economy.

Please consider approving this project and others that address the environment, economy and community in positive ways.

Sincerely,

John G. Williams
President & Chief Executive Officer

making your healthcare **new heights**

02-1

Response 02	Barton Health John G. Williams, President & Chief Executive Officer, June 18, 2012
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O2-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
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03



Carson Valley
Chamber of Commerce
and Visitors Authority

June 20, 2012
Tahoe Regional Planning Agency
Governing Board
PO Box 5310
Stateline, NV 89449

Members of the Governing Board,

Please accept this communication as a letter of strong support of Alternative 1A as outlined in the Draft Environmental Impact Statement of the Edgewood Tahoe Lodge Project from the Carson Valley Chamber of Commerce & Visitors Authority. We believe that the proposed project delivers significant improvements across a number of areas, with positive impacts on the economy, the environment and the quality of life of the community.

The economic benefits are obvious, with the project filling a known market desire for an upscale resort facility worthy of its location on the lakeshore. Those benefits would include not just increased revenues from an increase in the numbers and quality of visitors and the subsequent increased tax proceeds but also create a number of badly needed new job positions.

The environmental benefits are well documented within the Environmental Impact Statement. The improvements to the Edgewood Creek watershed and ultimately, Lake Tahoe's clarity and the improvements made off site by the replacement of old, inefficient lodging properties with LEED Certified TAUs through the Transfer of Development Rights program are significant.

Finally, we believe that the community benefits are also considerable. It has long been recognized that a lack of public access to the Lake shoreline is a detriment not only to the visitor but the resident as well. The creation of additional Lake recreation access is an enormous benefit as is the aforementioned removal of several blighted properties on the South Shore.

As the Carson Valley Chamber of Commerce & Visitors Authority, we are commenting because we recognize that significant improvements to the Lake portion of Douglas County benefit not just jurisdictions at the Lake, but those of us in Carson Valley as well. The benefits to the clarity of the lake, the health of the economy and the quality of life for the community do not stop at the top of the Lake Tahoe watershed.

03-1

1477 U.S. Hwy 395 Suite A, Gardnerville, NV 89410
775-782-8144 • Fax: 775-782-1025 • Email: info@carsonvalleynv.org
www.carsonvalleynv.org • www.visitcarsonvalley.org

-2-

We appreciate the opportunity to comment and urge your positive action on Alternative 1A of the proposed project. We would be more than happy to answer any questions regarding our position that this letter raises.

03-1
cont'd

Sincerely,



Bill Chernock
Executive Director

On behalf of the Board of Directors of the Carson Valley Chamber of Commerce & Visitors
Authority

1477 U.S. Hwy 395 Suite A, Gardnerville, NV 89410
775-782-8144 • Fax: 775-782-1025 • Email: info@carsonvalleynv.org
www.carsonvalleynv.org • www.visitcarsonvalley.org

Response 03	Carson Valley Chamber of Commerce and Visitors Authority Bill Chernock, Executive Director, June 20, 2012
O3-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

04

GREAT FUTURES START HERE.

BOYS & GIRLS CLUB
OF LAKE TAHOE

June 16, 2012

Tahoe Regional Planning Agency
Attn: Theresa Avance, Senior Planner
PO Box 5310
Stateline, NV 99449

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EXECUTIVE DIRECTOR

Karen Houser

Dear Theresa:

On behalf of the Boys & Girls Club of Lake Tahoe, and the 878 young people and their families we served last year, I would like to present this letter of support regarding the Edgewood Tahoe Lodge Project.

The Boys & Girls Club of Lake Tahoe believes in and supports the Edgewood Tahoe Lodge Project for numerous reasons.

The first reason is the benefit it brings to our community, our youth and our future. At the Boys & Girls Club we are teaching our young people the importance of being a steward of the land and this beautiful mountain setting we call home. Our kids are learning about green building techniques, air and water quality, and the role and responsibility each of us has to sustain our environment. The Edgewood Tahoe Lodge Project embodies and represents all of the components of a business being an integral part of the future of our environment; both geographically as well as socially.

The second point of our support is the economic impact the project will have directly on the families we serve throughout South Lake Tahoe. Like so many families across the country, ours face many challenges. Our young members often carry the burden of the world on their shoulders as they worry every day about a parent or caregiver losing their job or the family home due to foreclosures. Re-vitalizing our local economy not only throughout the construction phases of the project, but into the future of the jobs that will be created to serve the guests coming to the Edgewood Tahoe Lodge for years to come, will have a positive impact on the future of these young people.

I would also like to share the community support that our kids and our club have received from Edgewood every year. Edgewood Tahoe has provided financial support and resources over the years that have continued to impact our ability to ensure our members are provided the hope and opportunity for a future filled with promise and success. Examples of this support included

04-1

the fact that Edgewood sponsors our annual golf tournament. On October 15, 2012 Edgewood will be sponsoring our 19th Annual Golf Tournament. This event is one of our most important fundraising events to support our club and our kids. Edgewood hosts and sponsors our Spirit of Spring event each May in collaboration with Southern Wine and Spirits. This represents yet another important fundraising event for our organization. Our club is the largest youth-serving organization in South Lake Tahoe and we have been established in our community since 1991. Although we are part of the national organization of the Boys & Girls Club of America, each club is entirely responsible for their own financial sustainability. As such we depend on the generosity and support from our local residents and businesses. We believe our young people are important, and we know that you do too. Edgewood Tahoe has always been there for our Boys & Girls Club of Lake Tahoe and the youth and families we serve.

Thank you for allowing our youth to have a voice in the important decisions that are being made in our community that will impact our young people for generations.

Yours truly,

Karen Houser

Karen Houser, Executive Director
Boys & Girls Club of Lake Tahoe

04-1
cont'd



Response 04	Boys & Girls Club of South Lake Tahoe Karen Houser, Executive Director, June 16, 2012
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O4-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
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05



June 25, 2012

Ms. Theresa Avance
Planning Department
Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89449

Dear Ms. Avance

EDGEWOOD LODGE PROJECT DEIS COMMENT LETTER

The following input is provided on behalf of Heavenly Mountain Resort for the Edgewood Lodge Project Draft Environmental Impact Statement (DEIS).

1. Heavenly supports the Edgewood Lodge project as proposed. It represents a thoughtful balance between environmental and economic improvements for the Region. Both are needed. As you are aware, there is very little capital investment in our community which is directly responsible for an unacceptably slow pace of improvements in both areas. The "Do Nothing" approach is not an option.
2. The project is consistent with both the adopted Stateline Community Plan and the Douglas County Master Plan.
3. The proposed project includes important EIP improvements to Edgewood Creek in the reaches of the creek that are adjacent to the lake.

Thank you for the opportunity to provide input. Please contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink that reads 'ANDREW STRAIN'.

Andrew Strain
Vice President of Planning & Governmental Affairs

P.O. Box 37180
Stateline, NV 89449
775/586-7000
www.heavenly.com

VAIL RESORTS
UNORTHodox RESORTS
UNORTHodox EXPERIENCES

05-1

Response 05	Heavenly Lake Tahoe Andrew Strain, Vice President of Planning & Governmental Affairs, June 25, 2012
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O5-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
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06



June 27, 2012

Tahoe Regional Planning Agency

Attn Theresa Avance
 Planning Department
 Tahoe Regional Planning Agency
 P.O. Box 5310
 Stateline, NV 89449

RE: Environmental Impact Report for the Edgewood Hotel Project

Dear Ms. Avance and TRPA Governing Board Members,

The League to Save Lake Tahoe appreciates the opportunity to provide comments on the Edgewood Hotel Project and its associated DEIS. The League staff and Board members have had numerous opportunities to meet with the project managers and participate in site visits to learn about the benefits of this project and the potential impacts.

The League supports the environmental benefits associated with this project, including the five Threshold Improvement Projects:

Threshold Project A – Edgewood Lodge Stormwater Approach
 Threshold Project B – Water Quality Improvements to the Stateline Stormwater Association
 Threshold Project C – Edgewood Creek Improvements
 Threshold Project D - Friday's Station Dam Rehabilitation
 Threshold Project E – Edgewood Tahoe Golf Course Fertilizer and Pond Management Plan

Although many of these environmental benefits and threshold improvements are a voluntary component to the project, when appropriate and feasible, threshold improvements such as these should be associated with any project presented to the Governing Board.

The League supports the preferred alternative including all associated benefits and Threshold Improvement Projects. However, the League remains concerned with the expansion of the urban boundary that was necessary on Recreation Land to allow development such as the proposed project. The Edgewood Hotel Project is located within Special Area #1 of PAS 70A. In 1993, the TRPA sought to extend the South Stateline casino-hotel district onto the Edgewood Golf Course by creating this Special Area that would allow certain permissible uses (250 tourist units) to be built on designated recreational land. The League brought suit and a successful settlement established the principal that urban boundaries should constrain the growth of commercial, tourist, and high-density residential development to existing urban areas, and protect lands used for recreational and watershed purposes from high-intensity uses. Part of the settlement agreement was that Special Area #1 would remain in the Douglas County Community Plan.

06-1

06-2

League to Save Lake Tahoe • 2608 Lake Tahoe Blvd. • South Lake Tahoe, CA 96150 • (530) 541-5388 • www.KeepTahoeBlue.org

Of the 28 acres in Special Area 1, approximately 9.8 acres will be developed. However, associated impacts of the project may be incurred throughout the entire Special Area. The Compact states in Article 1(a)(5) *"Increasing urbanization is threatening the ecological values and threatening the public opportunities for use of the public lands."*

The DEIS does not address the expansion of the urban boundary but relates this project to the uses described as permissible in PAS 070A. We urge that the FEIS reassess the change from Recreation to PAS 070A in light of the details of this project and address impacts and mitigation measures for the expansion of the urban boundary. Although the EIS determines that the proposed Alternative 1 "uses are compatible with the surrounding uses and are consistent with the scale, density, intensity, and types of uses envisioned in PAS 070 and the Stateline [Community Plan]... this impact is considered less than significant," the EIS does not address the regional impacts of expanding the urban boundary into recreational lands, and increasing intensive urban activities beyond designated urban areas.

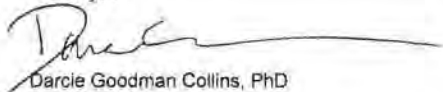
Urban boundaries should provide opportunities for the redevelopment of commercial, tourist, and residential development within urban areas while protecting lands used for recreational and watershed purposes from urban impacts.

To reconcile the expansion of the existing urban boundary, the League recommends that the Board encourage the project proponents to retire potential development in lands at a size equivalent to the expansion of the urban boundary for Special Area 1 to offset this expansion.

The League is aware that the project has retired and restored portions of the SEZ that was previously the Colony Inn, as well as creation of the Bonanza Park. However, this retirement is only an equivalent of 2.4 acres. The 4 acres of SEZ restoration and permanent retirement of 307,999 SF of potential allowable coverage associated with this project, although beneficial, is within a Recreation Area and also does not specifically address the urban boundary expansion. Removal of additional land from an environmentally beneficial area within the urban boundary will help offset the expansion allowed for to create Special Area 1 and protect the ecological values of the basin. Another solution to this expansion may be to deed restrict portions of the conservation land owned by Park Cattle Company on the North side of Highway 50.

For the reasons outlined above, the League is supportive of the proposed project but recommends the Board require the retirement or restriction of potential development to compensate for the expansion of the urban boundary to approve this project.

Thank you



Darle Goodman Collins, PhD
Executive Director
League to Save Lake Tahoe

06-2
cont'd

Response 06	League to Save Lake Tahoe Darcie Goodman Collins, PhD, Executive Director, June 27, 2012
O6-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
O6-2	<p>The commenter expresses concern regarding the expansion of the urban boundary onto recreational land to allow development such as the proposed project within Special Area #1 of PAS 070A. The commenter references the August 24, 1994 Settlement Agreement between TRPA and the League and references Article 1(a)(5) of the Compact that states “Increasing urbanization is threatening the ecological values and threatening the public opportunities for use of the public lands.” The League reserved the right in the 1994 Settlement Agreement to challenge the PAS 070A amendment within 60 days after TRPA approves a project pursuant to the amendment, such as the proposed project. The commenter indicates that the Draft EIS does not address the expansion of the urban boundary, but that it relates the project only to the uses currently described as permissible in PAS 070A.</p> <p>The commenter requests that the EIS analyze the previous changes to PAS 070A to allow tourist accommodation uses in Special Area #1 and the resultant regional impacts of expanding the urban boundary into recreational lands and increased intensification of urban activities beyond designated urban areas. And finally, to reconcile the expansion of the existing urban boundary, the League recommends that the Board encourage the project applicant to retire or restrict potential development in lands at a size equivalent to the expansion of the urban boundary for Special Area #1 to compensate for this expansion. The commenter suggests that this could be accomplished either by removing additional land from an environmentally beneficial area within the urban boundary to offset the expansion and to protect the ecological values of the Basin, or by deed restricting portions of the conservation land owned by Edgewood Companies on the east side of U.S. 50.</p> <p>Page 1-5 of the Draft EIS recognizes the League’s concern, raised during scoping, regarding expansion of the Tahoe Basin’s urbanized areas by amending PAS 070A to include tourist accommodated uses as permissible uses in Special Area #1. In approving the permissible use in 1993, the TRPA Governing Board considered the appropriateness of the site in accommodating such uses. As a practical matter, because the project would draw tourist accommodation units from a finite pool of commodities (meaning any units constructed at the Edgewood site would not be available for construction elsewhere), and because the project site is appropriate for such uses (e.g., adjacent to the urbanized casino corridor, on the property of an existing recreational amenity, and includes high capability lands suitable for development), no impacts relative to the urban boundary would result. The Draft EIS does evaluate the project with respect to planning provisions in place today, i.e., PAS 070A as amended in 1993, and the permissible uses allowed within Special Area #1, and importantly, it thoroughly evaluates the impacts of the project on the entire project site, including Special Area #1 (e.g., land use compatibility, biological resources, water quality, traffic generation, and other effects). Development within Special Area #1 would neither encourage growth or development elsewhere in the Basin nor result in increased development Basin-wide.</p> <p>While the 1987 Regional Plan does not expressly define “urban boundary”, TRPA’s Goals and Policies document provides that, “[s]ince the development permitted under this Plan is generally limited to the existing urban boundaries in which uses have already been established,</p>

the concept of this land use plan is directed toward regulating in fill and redirection.” (Chapter 2, Land Use, Goal #2, Policy #2). The significance of the urban boundary or urban area under TRPA’s Regional Plan is to generally limit additional development to areas with existing uses and infrastructure rather than developing remote undeveloped areas. The Edgewood Tahoe Golf Course is already developed, served by existing utilities and situated adjacent to the most developed area in the Tahoe Basin. Permitting tourist accommodations in PAS 070A, though designated “Recreation” would not conflict with the Regional Plan.

The project site is privately owned, and as such does not constitute “public lands” referenced in Article 1(a)(5) of the Compact. Current uses in Special Area #1 are limited to golf play, a recreational activity available to the general public. Importantly, the proposed project would not displace any existing recreational use at the site, but it would instead enhance the recreational value of the site by offering a range of new lakefront recreation opportunities to lodge guests and the public, including a public beach and shared-use path, among others, that would otherwise not be available. The project would also increase public access to Lake Tahoe, a specific goal in relevant planning documents. The additional public access would also provide walkable access from the Stateline casino corridor to the Lake, an opportunity that is currently unavailable. These new opportunities are consistent with the recreational designation of PAS 070A.

For these reasons, the Draft EIS determines that the project is compatible with the surrounding uses and is consistent with the scale, density, intensity, and types of uses envisioned in PAS 070A and the adjacent Stateline Community Plan.

07



JMA Ventures, LLC
P.O. Box 3938
Truckee, CA 96160
530.582.6080 main
530.582.7351 fax

David A. Tirman
Executive Vice President
Direct: (530) 582.6085
dtirman@jmaventuresllc.com

13 May 2012

Tahoe Regional Planning Agency Governing Board (TRPA)
C/o Judy Nikkel
Tahoe Regional Planning Agency
128 Market Street
P.O. Box 5310
Stateline, NV, 89449

Re: Edgewood Lodge & Golf Course Improvement Project

Dear Members of the Governing Board:

JMA Ventures, LLC would like to express our full support for the Edgewood Lodge & Golf Course Improvement Project preferred alternative "1A". While understanding that this alternative slightly exceeds existing TRPA building height standards, it is our belief that the scale, the architectural character, and ridgeline profile of the preferred alternative are designed in a balanced manner that blends perfectly within the context of the Edgewood setting.

Although the other lodge alternative known as "1B" is in conformance with existing height limitations, the result is an overall appearance of flat roof lines which we believe lack the aesthetic appeal & visual presence of the preferred alternative. In doing a side-by-side comparison of the two designs, it becomes readily apparent that alternative 1A is superior in terms of architectural design and overall scenic quality.

In short, we would encourage the governing board to support making an allowance in this particular case for the relatively modest amount of additional height which we believe would result in a far superior scenic outcome for the proposed Edgewood Lodge and surrounding context.

Respectfully,

A handwritten signature in dark ink, appearing to read "David A. Tirman", is written over a light gray background.

David A. Tirman AIA

07-1

Response 07	JMA Ventures, LLC David A. Tirman, AIA, Executive Vice President, May 15, 2012
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O7-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
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08



June 27, 2012

Attn: Theresa Avance,

RE: Edgewood Lodge Project, Draft EIS Comment

Dear Tahoe Regional Planning and Advisory Planning Agency Members,

My name is Greg Campbell and I am the Area General Manager for Marriott Vacation Club International here in Lake Tahoe.

I would like to submit my comment in support of the proposed Edgewood Tahoe Lodge Project. I have reviewed the Draft Environmental Impact Statement as well as other materials about the Edgewood Lodge Project and would like to share the following comments with you.

Based on the thoroughness of the Draft Environmental Impact Statement it seems very clear that this project will have no significant impacts and, in several instances, it will result in improvements to the natural landscape.

What is also mentioned in the Draft EIS, but only in a minor way, is the benefits it will have to job growth. Once built, the Lodge will provide the equivalent of 183 new full-time jobs. This translates in to 183 families who can make a living, go to our schools, and live in our community.

Not mentioned in the Draft EIS but in an outside study, conducted by Bay Area Economics, commissioned by the City of South Lake Tahoe last year, along with the mentioned job growth, there is going to get other economic benefits:

- Lodge guests expected to spend up to \$24 million annually at local businesses
- The Lodge is expected to generate up to \$2 million in TOT and Transient Lodging License Fees (8% and 2% respectively) per year
- Increase in generated sales tax of up to \$1.7 million (7.1% tax at \$24 million in revenue)

And finally, we need Edgewood to continue with the redevelopment efforts that began with the Heavenly Village project to serve as a role model for what the South Lake is moving towards in the future. The proposed alpine architectural style and the fact that they are going for a silver level of green building standards indicates that not only are they going to create something that is visually appealing but impact water and energy use.

Let's get Edgewood Lodge passed and starting moving forward on all of these good things.

Thank you,

Greg Campbell
Area General Manager
Marriott Vacation Club International

08-1

Response 08	Marriot Vacation Club International Greg Campbell, Area General Manager, June 27, 2012
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O8-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
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09

Midkiff
& Associates, Inc.
CONSULTANTS

June 26, 2012

Ms. Theresa Avance
Planning Department
Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89449

Dear Ms. Avance

EDGEWOOD LODGE PROJECT DEIS COMMENT LETTER

The following input is provided by Midkiff & Associates, Inc., for the Edgewood Lodge Project Draft Environmental Impact Statement (DEIS).

1. The Edgewood Lodge project represents a thoughtful balance between environmental and economic improvements for the Region. This type of project is an example of the type that is needed to replace the tired, outdated, and unwanted lodging that we have too much of in the Tahoe Basin. Also, this type of project is what is needed to attract the outside capital investment necessary to replace no longer available public funds for environmental, recreational, social and economic viability to our community. Without these types of projects, and the investments they attract, our community economy, quality of life and environment will continue to decline.
2. The project is consistent with both the adopted Stateline Community Plan and the Douglas County Master Plan.
3. The proposed project includes additional important EIP improvements like the Stateline Stormwater System to the Stateline area and Edgewood Creek.

Thank you for the opportunity to provide input. Please contact me if you have any questions or comments.

Regards,


Gary D. Midkiff
President

Post Office Box 12427 • Zephyr Cove, Nevada 89448 • Office (775) 588-1090 • Fax (775) 588-1091
295 Highway 50 • Lake Village Professional Building, Suite 8 • Lake Tahoe, Nevada 89449

09-1

Response 09	Midkiff & Associates Gary D. Midkiff, President, June 26, 2012
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O9-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
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010

**Sierra Colina, LLC**

Mail to:
P.O. Box 129
Lake Tahoe, NV 89448-0129

FedEx, UPS Deliveries (No Mail):
224 Kingsbury Grade, Suite #203
Stateline, NV 89449

E-mail: info@sierracolinalake.com
Website: www.sierracolinalake.com
Tel: (775) 588-4949 • Fax: (775) 201-0696

June 27, 2012

Tahoe Regional Planning Agency
128 Market Street
P.O. Box 5310
Stateline, NV 89449

Attention: Chairman Norma Santiago, TRPA Governing Board Chair

Regarding: Edgewood Lodge and Golf Course Improvement Project Draft Environmental Impact Statement

Dear Chairman Santiago and Governing Board Members:

Having recently experienced the rigorous environmental review process for the Sierra Colina Project, which is less than a mile from the proposed Edgewood Lodge and Golf Course Improvement Project (Edgewood Lodge), we have a deep appreciation for the appropriate analytic standards. A review of the Edgewood Lodge Draft Environmental Impact Statement (Draft EIS) makes clear that TRPA conducted a thorough and rigorous scientific process to identify and analyze all potential impacts of the Project.

From our Sierra Colina EIS experience, we are acutely aware that the primary focus of an EIS is identifying and analyzing all significant, adverse environmental impacts. The striking conclusions of the Edgewood Lodge Draft EIS were not the adverse impacts of the Edgewood Lodge, which were analyzed and found to be not significant, either on their own or with mitigation, but the Edgewood Lodge's qualitatively and quantitatively extensive beneficial impacts documented in the Draft EIS.

We are very proud of Sierra Colina's public-private partnership (EIP #679 Lake Village Drive water quality improvement project), which Douglas County estimates will eliminate 140,000 pounds of sediment per year. The Edgewood Lodge has taken the creation of environmental improvements to a whole new level. Its enhancement of a natural water filtration system that stands as the last line of defense for a 4,000 acre watershed before it reaches the Lake is remarkable. From the evaluation of the proposed Threshold Improvement Projects made possible by the Edgewood Lodge, we were pleased to learn that the Project will capture 500,000 pounds of sediment every year, including 50,000 pounds of fine sediment particles annually. The Edgewood Lodge is another example of the type of environmental enhancement being funded and built by the private sector that will help preserve the clarity of Lake Tahoe.

Leaving no stone unturned, the draft EIS carefully discusses the Edgewood Lodge's impact on each of the TRPA's threshold objectives from Air Quality to Recreation. Almost without exception, the Draft EIS documents how Proposed Alternative 1a will further the attainment of TRPA threshold goals, especially related to water quality. At a time when new public funding for environmental improvement projects is non-existent, the Edgewood Lodge is a sterling example of how private investment can be leveraged to further the attainment of environmental goals through redevelopment of the built environment.

The completion of the Edgewood Lodge will encourage other private investment in the Basin to design and install additional water quality and environmental improvements, which will benefit the Lake and will help to create a strong local economy, without which the stewardship of Lake Tahoe is in jeopardy. Please consider our endorsement as a neighboring stakeholder in your decision making process.

With Respect,

Steven C. Kenninger & Gail A. Jaquish, Ph.D.
Sierra Colina, LLC

010-1

Response O10	Sierra Colina, LLC Steven C. Kenninger and Gail A. Jaquish, Ph.D., June 27, 2012
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O10-1	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
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2.4.5 INDIVIDUALS

11

6/23/12

Tahoe Regional Planning Agency
ATTENTION: Ms. Theresa Avance
Subject: Edgewood Lodge Project/EIS

Dear TRPA Governing Board Members,

I'm writing to you regarding the Draft Environmental Statement for the Edgewood Tahoe Project. Please understand that I'm a private citizen and Tahoe homeowner and that I'm vitally interested in anything that can contribute in meaningful ways to our coveted Lake Tahoe lifestyle. I feel this new project will do just that.

I'm not an expert on soils or water or environmental science. I'm simply someone who feels that there's a necessary balance between doing what's right for our precious environment and doing what's right for our struggling community. I've been a resident here for over a decade and feel this entire area is at a tipping point.

When I attended the first public meeting about this project at Edgewood, I came away impressed with the lengths to which Edgewood was going to ensure that this balance was protected and respected. If anything, I felt they were leaning further into protecting the environment than protecting their corporate needs.

I was particularly impressed with Edgewood's plan to provide more beach access and outdoor recreation opportunities. This is especially important here in this main casino core where these are currently scarce commodities. As outlined in the Draft Environmental Impact Statement, the Lodge project would include public access to all kinds of lakefront recreational activities heretofore not available. I like the idea of a public swimming beach where there's now a parking lot, food and beverage service, viewing decks, kayak and bike rentals, restrooms and more. This all struck me as hugely positive for this area as well as for Tahoe. And to accomplish this, Edgewood is even moving an entire golf hole.

Looking deeper into the EIS, I saw that "...public users would have access to the lakefront recreation area via the public shared use access pathway or a loop drop off area in front of the existing clubhouse." To all that, I say hurrah!

I was also impressed with Edgewood's plans to keep over 500,000 pounds of sediment per year out of the lake. I ask you this: what other private (non-government) entity in Tahoe would step up and do something like this? I can't think of one.

Moving to our struggling local economy, I see this project as a huge economic driver. I've even heard of a study done by the City of South Lake Tahoe that says the Edgewood project could generate as many as 400 jobs. The positive ripple effect for this city's businesses and housing market and more would be profound, and all at a time when it is so profoundly needed.

11-1

In my opinion, completing this project would add immeasurably to the appeal of South Lake Tahoe. Edgewood, in its current configuration, is a tangible asset and proves its worth with every visit I've ever made. Whether it's to have a casual lunch at Brooks, to enjoy a pleasant dinner (with a local's 2-for-1 deal) or to attend a wedding there, I always come away impressed. There seems to be a rare and understated, "Edgewood Way" of doing things that just resonates well with me.

I feel the Edgewood Lodge Project will only propel all of that to an even higher level. In so doing, our entire community will prosper and South Lake Tahoe will become an even more diverse destination choice. From campers to casino and motel guests to timeshare owners and now to the people that will be attracted to this new property, Lake Tahoe will become even more appealing. It should even attract more international visitors.

I appreciate this opportunity to have my voice heard and I hope that you will do all you can to move this project forward. For so many good reasons, it's just the right thing to do.

Sincerely,

James F. Barr

1845 Bonanza Trail
South Lake Tahoe, CA 96150

530.542.2160

I1-1
cont'd

Response**I1****James F. Barr, June 23, 2012**

I1-1

The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

12

June 25, 2012

Casey Blann
 Vice President and General Manager
 Kirkwood Mountain Resort
 P.O. Box 1
 Kirkwood, CA 95646
 209-258-7202
 cblann@vailresorts.com

RE: Edgewood Lodge Project, Draft EIS

Dear Tahoe Regional Planning Governing Board Members,

Improvement to the environmental conditions at Lake Tahoe is good for business, both for the California and Nevada sides of the Lake. We are all well aware that tourists travel to our area and people move to our region because of the beauty of our natural landscapes. People who travel to Lake Tahoe to recreate do so with certain expectations of having world class amenities to match the world class scenery. This improvement to Edgewood certainly represents one of the quality projects that we need to continue to create in order to compete on the world market.

Projects like the Edgewood Lodge are exactly the type of redevelopment we need in the Basin; partly due to the fact that is beneficial to both States. They have removed unsightly hotels (by buying expensive TAU's), some in stream zones, and relocated those development rights to a much more desirable location; the downtown core of South Lake Tahoe. Because of this transfer of development rights, visitors can walk to a variety of amenities. Keeping people out of cars is good for the air quality in Lake Tahoe; again, a benefit to both California and Nevada. And let's remember, they are doing all of this on their own dime. A great example of private enterprise footing the bill for environmental improvements.

Another benefit of the Edgewood Project is that it will improve the lives of many families in both Nevada and California by virtue of the jobs that the new Lodge will bring. With unemployment rates averaging 19% in South Shore, we sorely need this. Once built, the Lodge will provide the equivalent of 183 new full-time jobs. This translates in to 183 families who can make a living, go to our schools, and live in our community.

Not mentioned in the Draft EIS but in an outside study, conducted by Bay Area Economics, commissioned by the City of South Lake Tahoe last year, along with the mentioned job growth, the Lodge is expected to bring additional economic benefits:

- Lodge guests are expected to spend up to \$24 million annually at local businesses
- The Lodge is expected to generate up to \$2 million in TOT and Transient Lodging License Fees (8% and 2% respectively) per year
- The Lodge is expected to generate sales tax of up to \$1.7 million (7.1% tax at \$24 million in revenue)

In summary, we need the Edgewood Tahoe Lodge to serve as a role model for what redevelopment projects in Lake Tahoe can look like in the future, especially in South Lake Tahoe. The proposed alpine architectural style and the fact that they are going for a silver level of green building standards indicates that not only are they going to create something that is visually appealing but also reduce the impacts on water and energy use.

Let's get Edgewood Lodge passed and start moving forward on all of these good things.

Thank you,

Casey Blann

I2-1

**Response
I2****Casey Blann, June 25, 2012**

I2-1

The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

13

To: The Tahoe Regional Planning Agency Governing Board
Subject: Edgewood Tahoe Lodge Project

From: Patrick Fountain
1246 Tata Lane
South Lake Tahoe,
California 96150
Phone: 530-541-5596
E-mail Wineowl@sbcglobal.net

Dear Governing Board members,

This letter is written in support of the Edgewood Tahoe Lodge project. I would like to thank anyone who was involved in the changes that the project has brought to the south end of the community. Tearing down the old dilapidated motel that sat on Bonanza Street and replacing it with a neighborhood park is a god sent for that area of our community. Most of the children that live in the apartment buildings in that area of the community have been subject to playing in the streets and parking lots for many years. Bringing a neighborhood park to that area of the community is creating a safe, clean, and healthy environment for the children that are being raised in the housing that surrounds that area.

The Edgewood Tahoe Lodge project will bring both construction jobs and long-term jobs to our community. As a long term resident of the community I have raised my family here and have been able to prosper. I would like to see that same opportunity made available to the youth of our community. This type opportunity is created by quality projects such as the Edgewood Tahoe Lodge.

The Edgewood Tahoe has been a quality business partner for our community for many years. Going forward with and approving the Edgewood Tahoe Lodge project will be a quality investment that will benefit our community for years to come.

Thank you.

13-1

**Response
I3****Patrick Fountain, Not dated**

I3-1

The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

14

Theresa Avance

From: Chris Proctor <CProctor@bartonhealth.org>
Sent: Monday, June 25, 2012 6:27 PM
To: Theresa Avance
Subject: Public Comment-Edgewood DEIS

Dear Teresa,

I am responding to a request for public comment regarding the Draft Edgewood Lodge Environmental Impact Statement.

I honestly did not read the entire 774 page document, but after reviewing the Summary of Environmental impacts that there are several key points that are beneficial and most are less than significant.

Perhaps the most significant is:

Impact 5.6.2-6 Interference with Littoral Processes from the Reconstructed and Expanded Pier and Relocated Mouth of Edgewood Creek. The proposed relocated mouth of Edgewood Creek would be the same with Alternative 2, as with Alternative 1. The Alternative 2 pier would be constructed in the same location as the existing pier and within the same littoral cell as the Alternative 1 pier. The Alternative 2 pier design is also the same as Alternative 1. The lake depth at the Alternative 2 pier location is expected to be about the same as the Alternative 1 pier. For these reasons, this impact is the same as Impact 5.6.1-6 described above for Alternative 1. Because Edgewood Creek is not a significant source of beach sand to the

Less than significant

No mitigation is required. Less than

significant

Significant Mitigation Measure 5.6.2-6: Reduce Floating Section of the Pier to 30 Feet. See Mitigation Measure 5.6.1-6 described above for Alternative 1. The same mitigation measure would apply.

Less than

significant

However, if the mitigation method is followed the outcome is less than significant.

Ultimately, these types of projects boil down to individual belief systems of what is "good for Lake Tahoe". I am of the belief that we need to bring Tahoe up to higher standards to match what companies like Vail have already started. If we can trust all of the organizations involved to do the right thing from an environmental standpoint then we are left with a proposal that has either beneficial or less than significant effect on our environment. Couple this with the ability to offer another truly top notch experience similar to the what the Heavenly Village (South Shore) and North Star (North Shore) provide now then we could only hope for a significant beneficial economic impact.

Finally, our organization is constantly looking for partnering opportunities when it comes to hosting medical conferences. Currently, we have limited conference offerings at best. The ability to offer a 5-star level destination with conference facilities on-site would allow us to attract more medical professionals to Tahoe. The dual benefit of offering an exceptional orthopedic educational experience with a spectacular lodging experience is obvious...higher likelihood of families traveling to Tahoe to attend medical conferences can equate to improving Tahoe as a truly world-class medical and vacation destination.

Sincerely,

Chris Proctor

14-1

**Response
I4****Chris Proctor, June 25, 2012**

I4-1

The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

15

Theresa Avance

From: Tish Sorokwasz <tsorokwasz@yahoo.com>
Sent: Monday, June 25, 2012 12:09 PM
To: Theresa Avance
Subject: Edgewood Project

Hi Theresa, Below, please find a copy of the letter in favor of the Edgewood Lodge Project.
Thank you,

Tish Sorokwasz

June 25, 2012

Tish Sorokwasz
3793 Lucinda Court
South Lake Tahoe, CA
96150

I5-1

RE: Edgewood Lodge Project

Dear TRPA

This letter is to let you know that I am in favor of the Edgewood Lodge Project. I have attended 2 presentations and have reviewed the Draft Environmental Impact Statement. All three were done in a thorough, professional way

I have lived in South Shore for over 40 years and am very enthused to support and see a project of this quality move forward. I wish to

stress the following points that I believe will bring permanent benefits to South Shore and all of Tahoe.

ENVIRONMENTALLY: Water quality is engineered throughout this project, therefore improvement of Lake clarity and fish spawning capabilities

ECONOMICALLY: This privately funded project will create many new jobs within our community from the beginning of planning stages through construction and continuing through operations and maintenance. The lodging portion of the project will bring an influx of tourist dollars for many years to come.

RECREATIONALLY: The excellent golf and dining Edgewood offers will be enhanced. The new pool and beach will be an asset as well.

In conclusion: The Edgewood Project is well researched and a good one for all involved.. I encourage the necessary agencies to agree and move forward.

Sincerely,

Patricia(Tish)Sorokwasz
tsorokwasz@yahoo.com

I5-1
cont'd

**Response
I5****Patricia Sorokwasz, June 25, 2012**

I5-1

The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

16

RE: Edgewood Lodge Project, Draft EIS Comment

Dear Theresa Avance ,Tahoe Regional Planning and Advisory Planning Agency Members,

My name is Marilyn Spencer, I am the broker owner of Alpen Mortgage Ca and NV.

I have gone over the available materials for the Edgewood Lodge Project, and would like to voice my enthusiastic support.

Unlike other projects in our area that have gone uncompleted, the financial and business reputation of the family and corporation behind this project is stellar. The time, careful planning and energy that has gone into it ensures its success. The consulting firms attached to this project are local talent, who have a vested interest in wanting only the best for the place they live.

Not only will local jobs be generated, but the tourist revenues for the area will increase also. Helping the smaller shops and stores in the area to stay in business. The Edgewood project has kept to a mountain architectural design of the buildings and grounds, keeping it consistent with the surroundings. The golf course will remain a world class attraction, now with the benefit of being a destination resort.

I give my full support to the Edgewood Lodge Project and anxiously await its completion.

Regards,

Marilyn Spencer

I6-1

**Response
I6****Marilyn Spencer, Not dated**

I6-1

The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

17

To: Teresa Avance, Tahoe Regional Planning Agency
From: Alison Stanton, Consulting Research Botanist
 3170 Highway 50 Suite # 7, South Lake Tahoe, CA 96150
alisonestanton@shcglobal.net
Date: 6/28/2012
Re: Edgewood Lodge Draft EIS comments

I am an independent research botanist and a 10 year resident of the Lake Tahoe Basin. I moved here in 2002 to initiate a research program on the endangered Tahoe yellow cress (TYC). Through my extensive field research on the species and my participation and facilitation of the TYC Adaptive Management Working Group (AMWG), I have become the foremost expert on the species.

The beach at Edgewood Golf course has been included in lake-wide surveys that have been conducted for TYC since 1979. The number of TYC stems occurring along the beach and at the mouth of Edgewood Creek may have fluctuated over time, but the site has been regularly, if not continually occupied. Based on this empirical survey data, the site has been designated a Core area for conservation of the species in the TYC Conservation Strategy.

It is my personal and professional opinion that the proposed Edgewood Lodge project does not pose a threat to the long-term persistence of Tahoe yellow cress on the site or threaten the viability of the population. It is the conclusion of the DEIS and my own conclusion that the potential impacts to TYC stem not from construction or operation of the Lodge but from the day-lighting of Edgewood Creek as part of Threshold Improvement Project C. However, the potential benefits from the proposed Threshold Improvement Projects would greatly outweigh any potentially significant effects on TYC. The recommended mitigation for the potential effect is rigorous and includes a longer survey period (5 years) than is generally imposed for similar projects (2-3 years). In addition, the proposed mitigation includes a strong adaptive management component and full cooperation with the TYC AMWG to both assess and mitigate any potential impacts from the project.

Edgewood Companies has a demonstrated track record of environmental stewardship for TYC and collaboration with the AMWG. AMWG members have been allowed access to their beach to conduct annual surveys and in 2007 and 2008 I was allowed to conduct experimental plantings of container-grown TYC and translocation of naturally occurring TYC on the golf course beach. Edgewood Companies has an active TYC Stewardship Plan in place and hosted a community planting event of 100 container-grown TYC this year in May.

The adaptive approach to TYC mitigation and the proposed water quality improvements included in the project design sets an excellent precedent for shorezone development

17-1

around Lake Tahoe. The proposed water quality improvements go above and beyond mitigation requirements and I commend Edgewood Companies for including them in the project. Edgewood Lodge would provide a great economic benefit to the community of South Lake Tahoe and the project design includes a host of beneficial water quality improvements that will help protect Lake Tahoe clarity. This is the way development should happen at Lake Tahoe and I strongly support the Edgewood Lodge project.

17-1
cont'd

**Response
17****Alison Stanton, June 28, 2012**

17-1

The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

18**Theresa Avance**

From: Paul Sterling <paulandrewsterling@yahoo.com>
Sent: Wednesday, June 27, 2012 10:33 AM
To: Theresa Avance
Subject: Edgewood Redevelopment

Dear Ms. Avance,

I am writing you today in support of the proposed Edgewood redevelopment project. I live in the Lakeside community and anything that brings our neighborhood and the South Shore out of the 60's is fantastic. Having the public beach access is fantastic on a personal level.

Please urge everyone at the TRPA to support this project.

Sincerely,
Paul Sterling
3999 Cedar Avenue,
South Lake Tahoe, CA 96150
530-544-2921

18-1

**Response
18****Paul Sterling, June 27, 2012**

I8-1

The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.

2.4.6 PUBLIC HEARINGS

The following tables present a summary of each substantive public hearing comment as well as a response (if one was provided at the hearings).

TRPA Advisory Planning Commission (APC)
Public Hearing Notes on Edgewood Lodge and Golf Course Improvement Project Draft EIS



May 9, 2012
9:30 AM—11:45 AM

Comment By	Comment Summary	Response Provided at Meeting (where applicable)
APC Members – Clarifying Questions		
John Upton	<p>Is there separate study that substantiates the sediment load findings</p> <p>Will the pier be in a location where it could be used by the public?</p> <p>Would beach users be able to use self-parking or valet parking?</p>	<p>Yes. Nichols Consulting Engineers (NCE) prepared analysis.</p> <p>Yes.</p> <p>Nanette Hansel (Ascent) and Edgewood Companies (EC): Not intended to be a drive-to beach</p>
Mike Riley	<p>Confused about how the public gets from parking lot to lodge/golf course facilities. Do they walk?</p> <p>Does the applicant intend to apply for a gaming permit?</p>	<p>Theresa Avance (TRPA): Golf course users would self-park; lodge users would use valet parking.</p> <p>EC: No, does not think it is permitted.</p>
Peter Maurer	Where would dredging material go?	Patrick Rhamey (EC): It would remain on site; much of it would be worked into the golf course improvements.
Chuck Green	What is the construction timeframe?	Patrick Rhamey (EC): Anticipates Governing Board hearing later this year. If project is approved this year, the earliest construction could begin would be next year. Initial phases would be constructing a new hole-9, site utilities, etc. They need to work around Celebrity Golf Tournament timing. Construction would need to commence as market timing/funds are appropriate

PH1-1

Comment By	Comment Summary	Response Provided at Meeting (where applicable)
	Will EC do anything that captures/exhibits the Park family's history and legacy?	and would allow. EC will continue to demonstrate thoughtful and patient progress toward project completion. Patrick Rhomey (EC): We haven't reached that level of detail yet. Other EC response: Yes, we have a good opportunity and will explore that in latter phases of planning/design.
Mark (Fire Chief Representative)	What is the anticipated use of the new proposed pier, and will there be a commercial use?	No commercial use. There would be no gas or pump house facilities. The pier would be used for limited operations/access to and from the resort.
Public Comments		
Pat Fountain (resident)	Supports project. Thanks anyone who's been involved in the positive changes that project is bringing to the "south end of the community." Project will bring jobs and other benefits locally.	
Alison Stanton (Research Botanist/Independent Consultant)	Have been conducting research on Tahoe yellow cress (TYC) since 2002. Consulted on some of the Draft EIS preparation related to TYC impacts. The benefits from Threshold Improvement Project C would "vastly outweigh" potential adverse impacts to TYC. The largest colony of TYC plants occurs north of the existing mouth of Edgewood Creek in a collapsed area (collapsed since 2006). There is a potential significant impact of moving the creek mouth, but it will be difficult to quantify. The proposed mitigation in the Draft EIS is a step forward in TYC	

PH1-1
cont'd

PH1-2

PH1-3

Comment By	Comment Summary	Response Provided at Meeting (where applicable)
	conservation at Lake Tahoe. EC would work with the TYC Adaptive Management Working Group (AMWG); and AMWG members support that idea and process.	
Karen Hauser (The Boys and Girls Club of Lake Tahoe)	Supports project. EC and the Park family have been huge supporters of youth in our community. (Karen provided some examples of how proposed improvements would benefit youth.)	
Corinna Osborne, General Manager of Horizon Casino and 15-year resident of South Lake Tahoe	<p>Supports Alternative "A." Based on thoroughness of Draft EIS, it seems clear that the project will have no significant impact and will improve natural landscape. The project would also have benefits to job growth, though that issue was only touched on in EIS.</p> <p>Although not mentioned in the Draft EIS, but in a separate economic study, there will be other economic benefits such as lodge-guest spending in the area, up to \$4.5 million annually, and an increase in generated sales tax.</p> <p>Conclusion: We need the Edgewood Project, to serve as a role model as to what new development should strive for. The silver-level LEED certification goal and lodge architecture are exemplary.</p>	
Margaret Eldridge Graph (owner of property next to the 9 th tee; small cabin owned by grandfather since 1930s)	<p>Does the study address hours and days of construction? Would the utility lines along the "dirt road" change? What are plans for Morgan house at Twin Pine? Is there a model of the project on display?</p> <p>Fence type – concerned about style of fence along Stateline border. We would prefer something like wrought iron instead of solid fencing, to promote views of trees</p>	

PH1-3
cont'd

PH1-4

PH1-5

PH1-6

PH1-7

Comment By	Comment Summary	Response Provided at Meeting (where applicable)
	and the golf course.	
	We support your project.	
Paul Sterling (owner and resident of Tahoe Village Apartments on Cedar Avenue)	Strongly supports project. This is exactly the type of world-class development the town needs. Under existing conditions, people have to drive to access the beach. Those existing driving trips could be substantial, and could be reduced by project. Environmental improvements are fantastic. Also, the benefit of acquisition of EC's TAUs is being understated.	
Lisa Deleon, Owner of Destination Tahoe Meetings and Events	Supports the proposed project. The project is a "godsend" for her group. Her clients are constantly looking for large lakefront properties suitable for larger groups--viable lakefront options to hold events and stay. There would be plenty of indirect benefits to the larger community and economy. For example, not all users of Edgewood's meeting space/facilities will stay at the Edgewood Lodge; this would benefit other lodges, caterers, florists, and other businesses in the area.	
Chris Stetler, Senior Civil Engineer with Nichols Consulting Engineers.	Part of consultant team that worked on project. Formerly worked for Lahontan RWQCB as an engineer. In favor of project. Very impressed with the level of EC's commitment to go beyond what is required (e.g., stormwater improvements).	Charlie Donohue (APC Chair): Project consultant testimony is not appropriate during public hearing/comment period.
Tom Castaneda, Tahoe Beach Club	The EIS is more than adequate. EC/Park Cattle have been tremendous stewards of the land. The various recreation improvements are important. The viability of the casino core area would benefit from improved outdoor recreation aspects of the	

PH1-7
cont'd

PH1-8

PH1-9

PH1-10

PH1-11

PH1-12

Comment By	Comment Summary	Response Provided at Meeting (where applicable)
	project.	
Bea Gorman (Tahoe Chamber of Commerce)	The Chamber has been promoting geotourism. The Edgewood project hits all of the geotourism tenets: LEED certification, environmental protection and improvements, etc. (Bea highlighted some environmental improvements of the project). Importantly, the project is using private investment dollars for these improvements.	
Gary Midkiff	Ponds and wetlands contribute to water quality benefits. The golf course has restored about 4.5 acres of wetlands in the last 20 years. The project would benefit the environment, economy, and socioeconomics. Urges certification of the EIS.	
Public Comment Closed.		
APC Member Follow-up Comments		
Steve Teshara	From TTD's perspective, EC has been a great partner in the South Demonstration Project and other efforts. Regarding the new pier: suggests considering opportunities for a cross ferry. Persuaded that the Alternative 1A version of the roofline is architecturally superior.	
Brandy McMahan	The Draft EIS references the 2006 Douglas County Master plan; however, the latest Master Plan was completed in 2011, and the 2011 Master Plan is available on the County's website.	
11:45 AM: HEARING CLOSED		

PH1-13

PH1-14

PH1-15

PH1-16

PH1-17

PH1-18

Response PH1	TRPA Advisory Planning Commission, Public Hearing May 9, 2012
PH1-1	TRPA APC members asked clarifying questions of TRPA staff, the project applicant, and the EIS consultant. All questions were answered at the public hearing and the responses are summarized in the table above.
PH1-2	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
PH1-3	See response to comment PH1-2.
PH1-2	See response to comment PH1-2
PH1-3	See response to comment PH1-2.
PH1-4	See response to comment PH1-2.
PH1-5	See response to comment PH1-2.
PH1-6	<p>As described in Section 3.6, Construction Schedule, of the Draft EIS, project construction is anticipated to begin in 2013 and be completed in fall 2017. Construction activities would occur between 8:00 AM and 6:30 PM. On occasion, there may be a need for longer work hours to meet specific constructability issues that cannot otherwise be accomplished in the standard 8-hour work period. Such work would be coordinated with and require authorization by TRPA and Douglas County as well as emergency service providers and any local residents that would be affected by construction activities outside of the established daytime hours. TRPA and Douglas County could impose conditions on construction outside of typical hours.</p> <p>The commenter asks whether the utility lines along the “dirt road” would change. Page 3-46 in the Draft EIS states that existing overhead utility lines north and south of the clubhouse would be undergrounded as part of the project. The proposed undergrounding would be limited to the designated project area and that portion of the Edgewood Tahoe Golf Course property located within Nevada. Overhead utility lines on the California side of the property along the dirt road would not be affected by the proposed project.</p> <p>The commenter asks what the plans are for the Morgan house at Twin Pines. Edgewood Companies owns the luxury lakefront home referred to as “Twin Pines” located within the broader Edgewood Tahoe Golf Course property, but in an area outside of the designated project area in California. The home was designed by Julia Morgan, designer of the famed Hearst Castle. Again, the proposed project limits improvements to those portions of the Edgewood Companies property within Nevada, and as such the project would have no effect on the Twin Pines property.</p> <p>The commenter asks if a model of the project is on display. A model of the project is not available at this time. The commenter is encouraged to review exhibits included in the Draft EIS, including building elevations appended to the document, and/or to review the complete plan set that is available during normal business hours at TRPA offices at 128 Market Street in Stateline, Nevada.</p>

- PH1-7 The commenter suggests incorporating a wrought iron instead of a solid fence to promote views of trees and the golf course. The commenter's suggestion would be considered in subsequent design phases. All building materials, including fencing, would be required to comply with TRPA design guidelines.
- PH1-8 See response to comment PH1-2.
- PH1-9 See response to comment PH1-2.
- PH1-10 See response to comment PH1-2.
- PH1-11 See response to comment PH1-2.
- PH1-12 See response to comment PH1-2.
- PH1-13 See response to comment PH1-2.
- PH1-14 See response to comment PH1-2.
- PH1-15 The comment is noted and the acknowledgement of the partnership on the South Demonstration Project is appreciated.
- PH1-16 The commenter suggests that the project applicant consider opportunities for a cross ferry. The pier that would be removed, relocated, and reconstructed as part of the project would not be for commercial use, as noted in Chapter 3, Project Description, in the Draft EIS (see pages 3-27 through 3-32). The pier would be accessible from the project area by Edgewood Lodge guests, with limited space for boat mooring. Edgewood Companies is not proposing the pier as a water taxi stop, but has indicated that if the pier is determined to be a desirable location for future water taxi service, it would be considered and likely allowed. No sewage, boat lift, lighting, or refueling facilities are proposed in conjunction with the pier.
- A separate project, Lake Tahoe Waterborne Transit, is listed in Section 5.15, Cumulative Impacts, in the Draft EIS as a related project that includes a water transit ferry and taxis, piers, and landside terminals at up to three locations throughout the Basin. A potential ferry terminal could be located at Ski Run Boulevard. This project is in the early planning phase, with environmental review planned to begin in 2012 and construction planned for 2015.
- PH1-17 This comment is noted.
- PH1-18 The commenter notes that the Draft EIS references the 2006 Douglas County Master Plan, but that the Master Plan was updated in 2011. At the time the Draft EIS was prepared, the 2006 Douglas County Master Plan was the current adopted plan. The Douglas County Board of Commissioners adopted the updated Master Plan on March 1, 2012, after the Draft EIS was written and before it was publically issued.
- The updated Master Plan was reviewed for any changes that would affect project consistency with the Master Plan. Changes to the 2006 Master Plan generally include renumbering of policy statements, refinement of policy language, and new policies related to fire hazards and hydrology and water quality. In its comment on the Draft EIS, Douglas County states that "the

County has found the proposed project (Alternative 1A) to be consistent with the goals and policies in the recently adopted Douglas County 2011 Master Plan..." (see comment letter L2).

Following review of the updated Master Plan and concurrence from the County, the project would be consistent with both the 2006 Master Plan referenced in the Draft EIS and the updated Master Plan that is now available.



TRPA Governing Board
Public Hearing Notes on Edgewood Lodge and Golf Course Improvement Project Draft EIS

June 28, 2012
 11:00 AM—1:48 PM
 (lunch recess from 12:15 – 1:15 PM)

Comment By	Comment Summary	Response Provided at Meeting (where applicable)
Governing Board – Clarifying Questions		
Shelly Aldean	How does pier relate to the existing Shorezone Program?	Low Feldman: The proposed pier reconstruction complies with current Shorezone regulations.
Claire Fortier	What is meant by the chapter “Human Health and Risk of Upset”?	Nanette Hansel (Ascent): That is a term used in the TRPA Initial Environmental Checklist (IEC). The chapter addresses risk of exposure to natural hazards (e.g., wildfire exposure) and hazardous materials (e.g., asbestos).
Shelly Aldean	If Tahoe yellow cress (TYC) responds well to disturbance, are we harming the plant by restricting access?	Nanette Hansel (Ascent): TYC does respond well to natural changes in lake levels and geomorphic effects, but not trampling. Fencing would allow natural processes to occur, but would avoid trampling.
Public Comments		
Carol Chapman (Lake Tahoe Visitors Authority)	Noted that NBC and other national organizations are excited about project. This project will encourage international visitation. Noted that project is going for LEED certification and is a good model for redevelopment. Tourism product has environmental benefits, becomes the model for our community as project goes forward. Noted that some	

PH2-1

PH2-2

Comment By	Comment Summary	Response Provided at Meeting (where applicable)	
	conferences cannot be held at a venue that has not been LEED certified. Does not see any negatives with this project. Asked that GB certify environmental document. Provided praises for Edgewood Companies as community leader.		PH2-2 cont'd
Patrick Baginski (Tahoe Outdoor Living Owner)	Landscaper for Bonanza Park. He has received excellent public response from the neighborhood for the Bonanza Park. He has seen a transformation of the neighborhood related to the park.		PH2-3
Bill Chernock (Carson Valley Chamber of Commerce and Visitors Authority)	Supports project, specifically Alternative 1A in EIS. This project sets an example for South Shore tourism. The South Shore lacks this type of high end lodging. Urges approval of Alternative 1A.		PH2-4
Alison Stanton (Research Botanist/Independent Consultant)	Involved with experimental research related to TYC since 2002. She is the foremost expert on TYC. Potential effects on TYC are not associated with the lodge, but the proposed threshold improvement projects. There are potentially significant impacts to TYC from Threshold Improvement Project C. Concerns about alteration of flow affecting a core population at creek mouth. It is not clear what long term impacts could be. Supports EIS adaptive management strategy that would more than adequately resolve potential impacts. Appreciates five year monitoring, which is longer than typical. Edgewood has consistently allowed access to property for TYC monitoring and enhancement. She supports this project.		PH2-5

Comment By	Comment Summary	Response Provided at Meeting (where applicable)	
Karen Hauser (Executive Director, The Boys and Girls Club of Lake Tahoe)	Introduce three girls that are boys and girls club members. Read the 700+ pages of EIS. Gives support to document as adequate. Read statement in support. Noted the connection to environment and education opportunities provided by the project. Recognized Edgewood Companies for their support of the boys and girls club.		PH2-6
Danette Winslow (St. Theresa Catholic School/Community Member)	Supports EIS, and helpful in understanding the project. Thankful for Bonanza Park project. Edgewood is an excellent community member. Water quality improvements ties into 3 rd through 8 th grade environmental studies. Thanks the TRPA for their work to protect and enhance the environment. Supports the project.		PH2-7
Barbara Roberts (Neighbor to golf course property)	Speaking for her family, including Margaret and Alan Graf). Supports the efforts at Bonanza Park. Neighbor to golf course property. Thankful and hopeful that project will keep the neighborhood peaceful and protect the natural environment. Supports Alternative 1A. They have the only cabin that you can see from site. Concerns about traffic flow and construction noise, hours of construction, and staging areas. Regardless, supports this long needed project.		PH2-8
Nick Exline (Midkiff and Associates)	Supports the project. Good example of a good marriage between the environment and economy. Project will provide much needed jobs.		PH2-9

Comment By	Comment Summary	Response Provided at Meeting (where applicable)
Governing Board Follow-up Comments		
Tim Cashman	What is the construction timeline? Any significant commercial development at the hotel?	Lew Feldman: No retail is being proposed at the lodge. Applicant hopes to initiate construction in 2013 and will begin with golf course realignment to allow for hotel construction. Lodge could be open around 2015.
Shelly Aldean	Mentioned League to Save Lake Tahoe letter regarding expansion of urban boundary and requested initial thoughts from Lew Feldman.	Lew Feldman: The PAS was adopted by the Governing Board in 1994, and allows construction of up to 250 TAUs. He does not interpret this project as impacting the urban boundary. Development can occur in recreation zone, like an RV park. Lodge is expressly allowed in the PAS and project mitigates impacts to less than significant. Disagrees with urban boundary issue raised by League.
1:48 PM: HEARING CLOSED		

PH2-10

Response PH2	TRPA Governing Board, Public Hearing June 28, 2012
PH2-1	TRPA Governing Board members asked clarifying questions of TRPA staff, the project applicant, and the EIS consultant. All questions were answered at the public hearing and the responses are summarized in the table above.
PH2-2	The comment of support is noted. The TRPA Governing Board will consider this comment at the time it considers project approval.
PH2-3	See response to comment PH2-2.
PH2-4	See response to comment PH2-2.
PH2-5	See response to comment PH2-2.
PH2-6	See response to comment PH2-2.
PH2-7	See response to comment PH2-2.
PH2-8	See response to comment PH2-2. In addition to voicing support for the project, the commenter also expresses concerns about traffic flow, construction noise, hours of construction, and staging areas.
	<p>Section 5.10, Traffic, Parking, and Circulation, of the Draft EIS describes the project's potential effects on existing traffic flow during project construction and operation (see Impacts 5.10.1-1, 5.10.1-5, and 5.10.1-7). These impacts are determined to be less than significant, and no mitigation is required.</p> <p>Project-generated construction source noise levels would not result in noise levels that exceed applicable standards because construction activities would be limited to the less noise-sensitive hours (e.g., daytime) for which associated noise levels are exempt from the provisions of the applicable standards (see Impact 5.13.1-1 in Section 5.13, Noise, of the Draft EIS). This impact is determined to be less than significant, and no mitigation is required.</p> <p>As described in Section 3.6, Construction Schedule, of the Draft EIS, project construction is anticipated to begin in 2013 and be completed in fall 2017. Construction activities would occur between 8:00 AM and 6:30 PM. On occasion, there may be a need for longer work hours to meet specific constructability issues that cannot otherwise be accomplished in the standard 8-hour work period. Such work would be coordinated with and require authorization by TRPA and Douglas County as well as emergency service providers and any local residents that could be affected by construction activities outside of the established daytime hours. TRPA and Douglas County could impose conditions on construction outside of typical hours.</p> <p>Construction staging areas, as described in Section 3.6, Construction Schedule, of the Draft EIS, would be established on the project area, on previously disturbed areas, and would be secured to prevent unauthorized access. At this stage of design, specific staging areas have not yet been determined. Staging areas would be established in locations to minimize impacts on nearby residential areas to the south.</p>

PH2-9 See response to comment PH2-2.

PH2-10 See response to comment PH2-1.

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3 REVISIONS AND CORRECTIONS TO THE DRAFT EIS

3.1 INTRODUCTION

This chapter includes revisions to the text in the Draft EIS following its publication and public review. The changes are presented in the order in which they appear in the original Draft EIS and are identified by Draft EIS page number. The changes shown in this chapter are the result of comments received on the Draft EIS that resulted in text modifications or corrections that occurred after circulation of the Draft EIS for public review and comments, and TRPA staff-initiated text changes. The proposed text modifications do not affect the impact analysis or conclusions in the Draft EIS. Revisions are shown as excerpts from the Draft EIS text, with strikethrough (~~strikethrough~~) text for deletions and underline (underline) text for additions.

3.2 REVISIONS AND CORRECTIONS TO THE DRAFT EIS

Chapter 1, Summary, on page 1-2, the third sentence of the first paragraph is revised as follows:

As part of its environmental review process, TRPA prepared and circulated a Notice of Preparation (NOP) informing responsible agencies and the public that the project could have a significant effect on the environment, and soliciteding their comments.

Chapter 1, Summary, on page 1-3, the last bullet is revised as follows:

- ▲ **Pier Removal, Relocation, and Reconstruction:** The existing Pruett Pier (so named after former lakefront homeowners Margaret Park Pruett and Robert Pruett) would be removed, relocated, and reconstructed at a location approximately 1,200 feet north of its current location. The proposed multiple-use pier would be ~~for private use, and would be~~ accessible by Edgewood Lodge guests.

Chapter 1, Summary, on page 1-4, the second full paragraph is revised as follows:

The proposed lodge building includes a building height that exceeds the existing height limits set forth in Chapter 37, "Height," of the TRPA Code to provide variability in the roof line and increased ceiling heights in some locations. The proposed lodge building design that requires an amendment to Chapter 37 of the TRPA Code is referred to as Alternative 1A herein. Alternative 1B includes the same development program as Alternative 1A, meaning the number and size of proposed units and accessory spaces would not change, but includes a proposed lodge design that complies with Chapter 37 of the TRPA Code. The purpose of the additional height for Alternative 1A would be to enhance the architectural appearance of the lodge building. The additional height does not add additional program or square footage to the proposed lodge. The extra "space" resulting from the Alternative 1A lodge design would create additional air space and/or accommodate mechanical equipment and possibly limited storage. When referring to Alternative 1 herein, unless otherwise specified, the reference applies to Alternatives 1A and 1B.

Chapter 1, Summary, on page 1-4, the last paragraph is revised as follows:

Construction of Alternative 1 would commence as soon as possible after project approval and acquisition of initial permits. Construction would be completed over the course of a minimum of 5 years, with initial construction anticipated to begin in 2013 and final project completion anticipated in fall 2017. Construction activities would be continuous, except during winter months when activities may cease for a period of time. Grading activities (including excavation, filling, and clearing of vegetation or other disturbance of soil) would be restricted between October 15 and May 1 of each year, unless approval was granted by TRPA pursuant to Section 33.3.1.B of the TRPA Code. Construction staging would be established on the project area, on previously disturbed areas, and would be secured to prevent unauthorized access.

Chapter 1, Summary, on page 1-73, the second impact statement in the first column of Table 1-1 is revised as follows:

Impact 5.10.1-5 Vehicle Miles Traveled (VMT). Alternative 1 would result in an increase of approximately ~~622~~⁵⁰⁴ VMT over the course of a peak summer day, or a 0.03-percent increase in existing region-wide VMT. Based on Subsection 65.2.4(C) of the TRPA Code of Ordinances, an air quality mitigation fee and/or in lieu mitigation measures would be required for the new trips generated by Alternative 1 of \$8,434.60 is required. Because the increase in VMT resulting from Alternative 1 is not substantial in relation to the VMT threshold, this impact is **less than significant**.

Chapter 1, Summary, on page 1-76, the first impact statement in the first column of Table 1-1 is revised as follows:

Impact 5.10.2-5 Vehicle Miles Traveled (VMT). Alternative 2 would result in a net increase of approximately ~~306~~⁴⁸⁵ VMT over the course of a peak summer day, or a 0.~~021~~-percent increase in existing region-wide VMT. In comparison with Alternative 1, Alternative 2 would generate a smaller increase in existing region-wide VMT. Based on Subsection 65.2.4(C) of the TRPA Code, an air quality mitigation fee and/or in lieu mitigation measures would be required for the new trips generated by Alternative 2 of \$3,221.80 is required. As the increase in VMT resulting from Alternative 2 is not substantial in relation to the VMT threshold, this impact is **less than significant**.

Chapter 1, Summary, on page 1-78, the first impact statement in the first column of Table 1-1 is revised as follows:

Impact 5.10.3-5 Vehicle Miles Traveled (VMT). Alternative 3 would result in a net increase of approximately ~~1,342~~²²¹ VMT over the course of a peak summer day, or a 0.~~076~~-percent increase in existing region-wide VMT. In comparison with Alternative 1, Alternative 3 would generate a slightly higher increase in existing region-wide VMT. Based on Subsection 65.2.4(C) of the TRPA Code of Ordinances, an air quality mitigation fee and/or in lieu mitigation measures would be required for the new trips generated by Alternative 3 of \$13,502.60 is required. As the increase in VMT resulting from Alternative 3 is not substantial in relation to VMT, this impact is **less than significant**.

Chapter 2, Introduction, on page 2-1, the second sentence of the third paragraph is revised as follows:

TRPA is a bi-state regional planning agency created in 1969 by federal law (Public Law 91-148) to oversee development on both the California and Nevada sides of Lake Tahoe.

Chapter 2, Introduction, on page 2-2, the third paragraph is revised as follows:

In accordance with Section 4.4.1 of the TRPA As mandated by the Code, TRPA may not approve a project if any of the nine TRPA thresholds would be exceeded. If a project would result in an exceedance of an identified threshold, mitigation must be imposed to reduce the impact and maintain the threshold. Pursuant to Chapter 4 of the TRPA Code, written findings must be made regarding the disposition of all significant environmental impacts and their associated mitigation measures, with substantial evidence provided in the record of review prior to final project approval. Also, pursuant to Section 3.7.4 of the TRPA Code, prior to approving a project for which an EIS was prepared, TRPA must make either of the following findings for each significant adverse effect identified in the EIS:

- A. Changes or alterations have been required in or incorporated into such project that avoid or reduce the significant adverse environmental effects to a less than significant level; or
- B. Specific considerations, such as economic, social or technical, make infeasible the mitigation measure or project alternatives discussed in the environmental impact statement on the project.

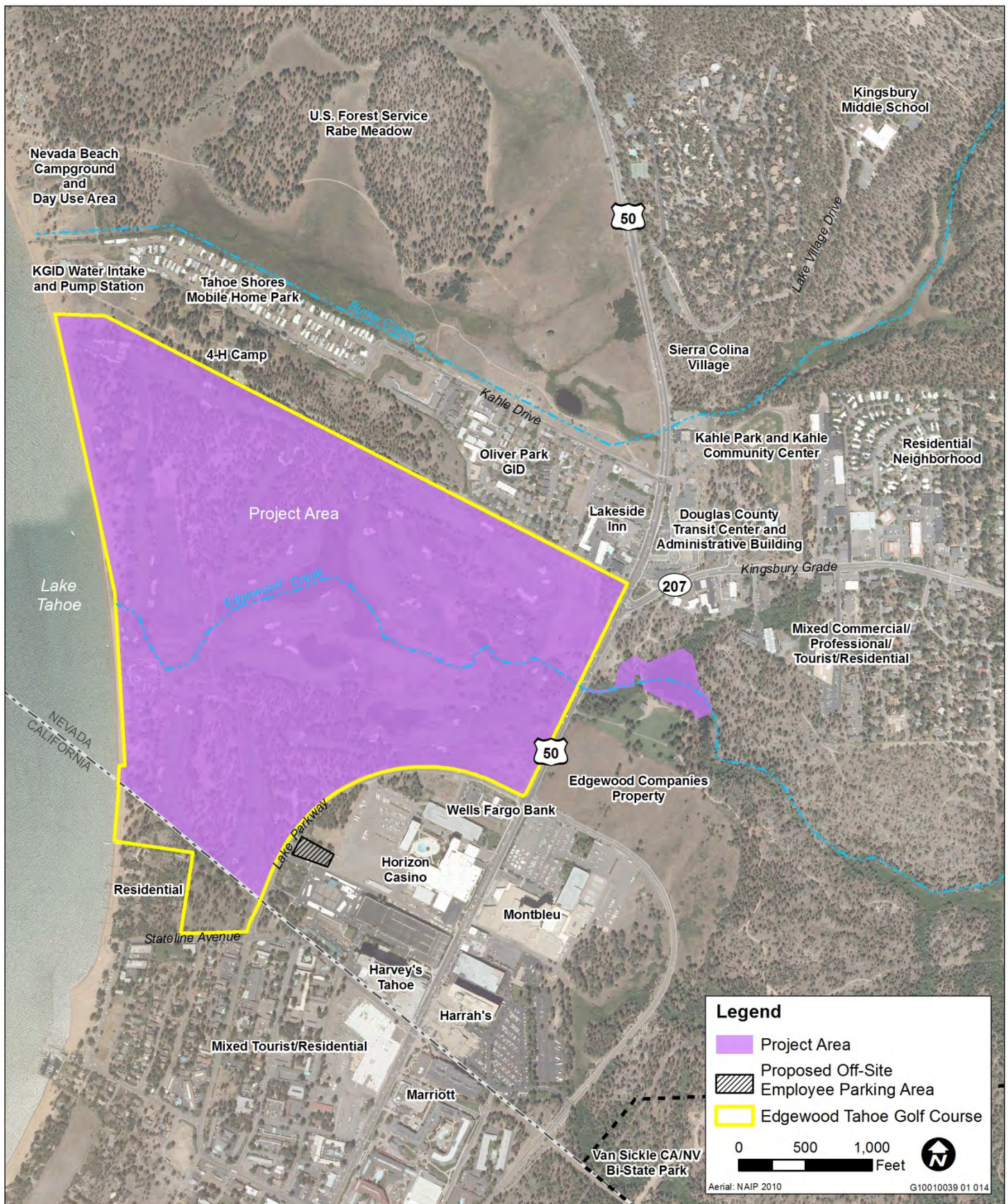
Chapter 2, Introduction, on pages 2-2 and 2-3, Table 2-1 is revised as follows:

Table 2-1. Required Permits and Reviews		
Permitting Agency	Permit Name	Purpose of Permit
Douglas County	Site Improvement Permit	Grading and engineering work
	Building Permit	Building design
	Floodplain Development Permit	Development in floodplain
Douglas County Sewer Improvement District	Sewer Permit	Authorization for sewer connections
Nevada Division of Environmental Protection	<u>SWPPP and other Bureau of Water Pollution Control permits</u>	<u>Activities related to soil disturbance and discharges at the site</u>
	<u>Water System Plan Review</u>	<u>Any modifications to the water system, including water line improvements</u>
<u>Nevada Department of Transportation, District II</u>	<u>Encroachment Permit</u>	<u>Temporary and/or permanent encroachment work within the state's right-of-way (if necessary)¹</u>
Edgewood Water Company	N/A	Authorization for water connections
State Water Engineer	N/A	Authorization to commit water resources required for the project
Nevada Division of State Lands	Pier Permit	Relocation and reconstruction of pier
Tahoe Regional Planning Agency	TRPA Permit	Threshold attainment Permit covers amendment to Chapter 37 of TRPA Code [Alternative 1A only], p Pier relocation and reconstruction, grading, SEZ restoration, etc.
U.S. Army Corps of Engineers	Section 404	Discharge of fill materials in waters of the U.S.

Table 2-1. Required Permits and Reviews		
Permitting Agency	Permit Name	Purpose of Permit
Reviewing Agency		Issue/Authority
Douglas County Sheriff's Department		Public safety
Tahoe Douglas Fire Protection District		Fire safety
Nevada Department of Transportation		Traffic
Nevada Division of Wildlife		Wildlife
U.S. Fish and Wildlife Service		Wildlife
State Historic Preservation Office		Archaeological and Historical Resource
Franchise Utilities		
Southwest Gas Company, NV Energy, Edgewood Water Company, Douglas County Sewer Improvement District, and Charter Business		Public services
Notes: SEZ = stream environment zone; SWPPP = storm water pollution prevention plan; TRPA = Tahoe Regional Planning Agency ¹ At this time, construction of the proposed project is not expected to be conducted within the state of Nevada's right-of-way; therefore, an encroachment permit from NDOT is not anticipated to be needed. Nevertheless, the possibility of acquiring this permit (if it becomes necessary) is recognized here.		
Source: Data compiled by Ascent Environmental, Inc. in 2011		

Chapter 2, Introduction, on page 2-3, the first sentence of the last paragraph is revised as follows:
 Pursuant to TRPA Code Subsection 3.7.1(D), this draft EIS is being ~~circulated~~^{distributed} for ~~at least a minimum~~^{at least a} 60-day public comment period.

Chapter 3, Project Description, on page 3-5, Exhibit 3-2 is revised to reflect the proposed off-site employee parking area as shown below.



Source: Adapted by Ascent Environmental, Inc. in 2010

Exhibit 3-2

Project Area and Surrounding Land Uses

Chapter 3, Project Description, on page 3-15, Table 3-1 is revised to reflect current permit information for the existing permitted snowmobile operation at the site.

Table 3-1. Recent Projects at Edgewood Tahoe Golf Course	
TRPA Permit# / File #	Description
Permit # 19920423	Clubhouse/parking lot elements of Stateline Stormwater Association System best management practices (BMPs), SSWA pump station, and pipeline to pond 10) (Note: the pond numbering at the site corresponds to the adjacent golf hole number.)
Permit # 19930383	Clubhouse remodel
File # 19940843STD	Underground tank removal
Permit # 19940894	Multi-year SEZ Restoration Project (restore SEZ, create wetlands, install fish ladder)
File # 19960417STD	Runoff control (BMPs) and parking lot paving
Permit # 19990525	Divert U.S. 50 runoff to new wetland; collect Lakeside Casino runoff to pre-treat and convey to new wetland; recontour 4th fairway; tree removal; fish habitat protection along Edgewood Creek; remove diversion structure below pond 5 and replace w/ rock drop structure to allow fish passage; create 0.5 acre additional wetlands; and remove about 6 acres of turf from golf play.
File # 2000365STD	Replace chain link fence with wrought iron fence
File # 20030239STD	Golf course entry gate replacement
File# 2030101STD	Golf course new and updated signage
Permit # 20030945	Utility line upgrades and maintenance facility relocation
Permit # 20050333	Outdoor recreation concessions and minor revision to parking and turn around area
Permit # 2006111	Grading permit for golf areas
Permit # 20060819	Placement of a generator on a newly constructed 68 square foot pad. Revegetated and retired 102 square feet of SEZ.
Permit # 20070006	Golf course modification (relocation of golf greens for golf holes 5 and 12)
Permit # 2007 0032	Man-modified determination (clubhouse project area changed from LCD 1b to 6)
Permit # ERSP2007-0139	Edgewood Water Company and KGID waterline project
Permit # ERSP2008-0466	Re-contour driving range near the golf hole 15 tee
Permit # ERSP2009-0766	Upgrade golf course irrigation system
Permit # ERSP2009-2090	Brooks Bar winter operation – temporary use (expired April 11, 2011)
Permit # ERSP2009-3415	Snowmobile operation – temporary activity (permitted through November 21, 2014 expired June 17, 2010)
Permit # Tree2010-0945	Tree removal (completed). Thinning around golf holes 5, 7, 8, and 9 for forest health reasons, and removal of a single tree near the entryway on Lake Parkway for safety reasons.
Permit # Tree2010-1295	Tree removal (has not been completed). Limited tree removal near the maintenance building to protect the structure.
Note: in addition to the projects and permits listed above, in 2011 and 2012 Edgewood Companies also obtained permits from TRPA verifying the land capability and coverage associated with the parcels where the two existing lakefront residences are located and that portion of the project area east of U.S. 50.	
Source: Thiel, pers. comm., 2010; TRPA 2012	

Chapter 3, Project Description, on page 3-16, the last sentence of the first paragraph is revised as follows:

The land use classification for PAS 070A is recreation and the planning statement states that the “entire area should provide a range of visitor and local serving outdoor-oriented recreation opportunities, integrated with the existing and planned improvements within the casino corridor. In addition special areas should provide accommodations for tourists.”

Chapter 3, Project Description, on page 3-27, the third paragraph is revised as follows to accurately reflect the legal status of the existing pier:

The existing Pruett Pier (so named after former lakefront homeowners Margaret Park Pruett and Robert Pruett) is a legally existing multiple-use pier within the project area constructed in 1978 under a permit issued by the Nevada Division of State Lands (Permit Number L0056) (NDSL 1978) in connection with the private residence at APN 1318-27-001-002, now owned by Edgewood Companies. The original NDSL permit was valid for a 20-year period and expired in 1998. An application for a renewed NDSL pier permit was submitted by Edgewood Companies on January 12, 2012. A TRPA pier permit application was submitted in 2009, but has not yet been issued because of the TRPA Shorezone Ordinances litigation. The existing pier extends approximately 91 feet into the lake and is 6 feet wide. It consists of wood decking supported on pairs of pilings spaced about every 15 feet and includes an approximately 16-foot by 3-foot ramp at its lakeward terminus. The existing pier includes a total of 18 pier pilings (14 pilings for the main pier and 4 pilings for the ramped area). The existing pilings are 12 inches in diameter for the main pier and 4 inches in diameter for the ramped section. Exhibit 3-10 shows the existing pier plan.

Chapter 3, Project Description, on page 3-33, the first paragraph is revised as follows:

The proposed lodge complex and water quality improvements would require several golf course and cart path modifications. In some cases the modifications are necessary to ensure adequate golf safety zones in and around the lodge and for the proposed lakefront recreation area. In other cases modifications are required to implement water quality improvement projects, either to create space for those projects to be implemented or to use material excavated as part of those projects to reshape golf areas in an effort to balance materials on site and minimize off-site export. The balancing of material on site would be conducted in accordance with TRPA Code provisions. Changes to the golf course are proposed in a manner that would maintain and enhance golf play. The proposed golf course modifications include the following:

Chapter 3, Project Description, on page 3-34, the header at the center of the page is revised as follows:

SITE LAND COVERAGE

Chapter 3, Project Description, on page 3-49, Table 3-7 is revised to reflect the correct total square feet of restoration required in association with the TAU sending parcels and to include an account of how those requirements are being satisfied, as shown below.

Table 3-7. Alternative 1 – Proposed Project TAU Source Details								
Description of retired property	Address	APN	No. of TAUs	Status	Land Capability District of Sending Parcel	Planned Re-use of Sending Parcel	Restoration Location and Square Feet of Restoration Required	Evidence Completed ¹
Tahoe Beach & Ski Club	3601 Lake Tahoe Blvd, South Lake Tahoe, CA	027-040-33 (Formerly 027-040-21)	63	TAUs banked on the sending property. The 63 TAUs were allowed to be banked through the combining of rooms.	7	Tahoe Beach & Ski Club (less 63 units), still exists. Rooms were combined resulting in an excess of TAUs for the property. Edgewood has purchased the 63 excess units.	Off-site, 41,263 sf	SEZ restoration on Edgewood Tahoe Golf Course
Carousel Motel	Laurel Ave, South Lake Tahoe, CA	029-061-10	27	Two motels on site, Carousel Motel and Thunderbird Motel, were demolished to allow for construction of Redevelopment Project 3. The identified TAUs are in excess of those needed for Redevelopment Project 3, and are banked on the sending property.	5	Redevelopment Project 3	Off-site, 13,746 sf	SEZ restoration on Edgewood Tahoe Golf Course
		029-061-14			5			
Thunderbird Motel		029-061-08	20		5		Off-site, 21,050 sf	
		029-061-13			5			
Colony Inn	3794 Montreal Road (west of Forest Suites Inn), Stateline, NV	029-441-04	34	Structures previous demolished. TAUs banked on the sending property.	5	Native SEZ & Upland restoration	On-site, 32,563 sf	Parcel restored (TRPA File ERSP 2009-3560)
					1b		On-site, 32,247 sf	
C&M Lodge	1209 Bonanza, South Lake Tahoe, CA	032-151-15	50	In June 2011 the South Lake Tahoe City Council approved Edgewood Companies' request to transfer 50 TAUs from the site to the project area and to replace the existing structure with a park (Bonanza Park) to be owned and managed by the City after completion. Park is expected to be constructed in 2012.	7	Conversion to a Neighborhood Park (Bonanza Park)	Off-site, 30,194 sf	SEZ restoration on Edgewood Tahoe Golf Course
Totals			194				171,06329,800 sf	
¹ Of the 106,253 square feet of restoration on Edgewood Tahoe Golf Course required to satisfy the off-site revegetation/restoration requirements for the TAU sending parcels, 89,506 square feet was completed and credited as of January 1, 2008 in association with the man-modified determination for the clubhouse. The remaining obligation for 16,747 square feet of off-site restoration at the Edgewood Tahoe Golf Course would be satisfied with the proposed 200,347 square feet of new, restored, or improved SEZ associated with the project. Source: Data provided by Edgewood Companies in 2011.								

Section 5.2, Land Use, on page 5.2-44, the first paragraph in the third column (with a header “Rationale”) in Table 5.2-3 is revised as follows:

Consistent with the Special Policies of PAS 070A and the planning direction of the Stateline CP, all of the development alternatives include public beach access and access to other proposed lakefront recreation opportunities via a shared-use path originating at Lake Parkway. Lake Parkway is currently served by a sidewalk on the north side of the roadway between the site entrance road and U.S. 50 to the east. Adequate crossing of U.S. 50 is provided at the U.S. 50/Lake Parkway traffic signal. The proposed shared-use path coupled with the existing sidewalk and Lake Parkway crossing at U.S. 50 would enhance the link between Special Area #1 and the casino corridor with all of the development alternatives.

Section 5.3, Scenic Resources, on page 5.3-13, the last sentence on the page is revised as follows:

As part of the contrast rating analysis conducted for the project, the applicant has calculated that the proposed total visible lakefront façade area for all the project’s shoreland structures (existing and proposed) would be 6,6536,459 square feet, substantially less than that allowed under Section 66.3 of the TRPA Code and therefore in compliance with the Code.

Section 5.3, Scenic Resources, on page 5.3-15, the second sentence in the last full paragraph is revised as follows:

At the same time, the clubhouse expansion and pool terrace, both located in the shoreland, would add 2,9332,739 square feet of visible façade area resulting in a net increase of 1,289095 square feet of visible façade area in the shoreland.

Section 5.3, Scenic Resources, on page 5.3-27, Exhibit 5.3-4b is revised as shown below to reflect refinement of the visual simulation to remove two initially proposed trees and some tall shrubs from in front of the clubhouse that are not required and could otherwise disrupt views from the clubhouse towards Lake Tahoe.

Section 5.3, Scenic Resources, on page 5.3-33, Exhibit 5.3-4e is revised as shown below to reflect refinement of the visual simulation to remove two initially proposed trees and some tall shrubs from in front of the clubhouse that are not required and could otherwise disrupt views from the clubhouse towards Lake Tahoe.

Section 5.3, Scenic Resources, on page 5.3-37, Exhibit 5.3-5a is revised as shown below to reflect refinement of the visual simulation to remove two initially proposed trees and some tall shrubs from in front of the clubhouse that are not required and could otherwise disrupt views from the clubhouse towards Lake Tahoe.

Section 5.3, Scenic Resources, on page 5.3-41, Exhibit 5.3-6a is revised as shown below to reflect refinement of the visual simulation to remove two initially proposed trees and some tall shrubs from in front of the clubhouse that are not required and could otherwise disrupt views from the clubhouse towards Lake Tahoe.

Section 5.6, Hydrology and Water Quality, on page 5.6-1, the following is added after the fourth full paragraph:

FEDERAL ANTIDEGRADATION POLICY

The EPA has designated Lake Tahoe an Outstanding National Resource Water (ONRW). ONRWs are provided the highest level of protection under EPA’s Antidegradation Policy, stipulating that states may allow some limited

activities that result in temporary and short-term changes to water quality, but such changes should not adversely affect existing uses or alter the essential character or special uses for which the water was designated an ONRW. The EPA interprets this provision to mean no new or increased discharges to ONRWs and no new or increased discharge that would result in lower water quality.

SAFE DRINKING WATER ACT

The Safe Drinking Water Act (SDWA) is the principal federal law (Code of Federal Regulations Title 40 Part 41) in the U.S. intended to ensure safe drinking water for the public. Pursuant to the SDWA, the EPA is required to establish National Primary Drinking Water Regulations (NPDWRs) for contaminants that may cause adverse public health effects. EPA sets standards for drinking water quality and provides oversight of all states, localities, and water suppliers that implement those standards. The SDWA applies to every public water system in the U.S.

Section 5.6, Hydrology and Water Quality, on page 5.6-6, the following regulatory information is added after the bullets at the top of the page:

- ▲ recreation not involving contact with the water;
- ▲ recreation involving contact with the water;
- ▲ propagation of aquatic life, including a coldwater fishery;
- ▲ municipal or domestic supply, or both; and
- ▲ water of extraordinary ecological or aesthetic value.

In addition, the Bureau of Safe Drinking Water, another branch of NDEP, has the duty to protect the public health of the citizens, tourists and visitors to the State by assuring the public water systems provide safe and reliable drinking water. Nevada's Safe Drinking Water Program regulates public water systems using a combination of State regulations and the National Primary Drinking Water Regulations (NPDWR) established at the federal level. EPA has granted the NDEP primary enforcement responsibility for the NPDWR. In order to maintain primary enforcement responsibility, the NDEP must adopt regulations that are at least as stringent as new or amended federal regulations. Public water systems are defined in Nevada Revised Statute (NRS) 445A.235 to include a "system, regardless of ownership, that provides the public with water for human consumption through pipes or other constructed conveyances, if the system has 15 or more service connections, or regularly serves 25 or more persons. In accordance with NRS 445A.855, NDEP has adopted primary and secondary standards for drinking water. Nevada Administrative Code (NAC) 445A.454 describes the monitoring and analysis requirements overseen by the Bureau of Safe Drinking Water to meet the primary drinking water standards. Any modifications to a water system, whether it be waterlines, treatment, or pump stations, is a water project that requires plan review by the Bureau of Safe Drinking Water in accordance with NAC 445A.6669. NAC 445A.66615 requires that the water system "ensure a reliable supply of water" during any such modifications.

Section 5.6, Hydrology and Water Quality, on page 5.6-30, the last paragraph is revised as follows:

Construction staging for the pier relocation would be provided by a barge on the lake. In addition, a turbidity curtain or other approved technology for containment of re-suspended sediment would be used at all times during construction to prevent earthen materials re-suspended as a result of pier construction from being transported to adjacent lake waters. As a permit condition, TRPA would require that the project applicant install caissons around proposed pilings, a turbidity screen around the entire construction site (in the water), and/or other appropriate measures as proposed by the project applicant and as approved by TRPA. These measures would remain in place until project completion and upon satisfactory inspection by TRPA to ensure that all suspended materials have settled. A turbidity curtain is a floating barrier consisting of relatively impervious fabric, used to prevent fine and coarse suspended sediment transport away from areas of water-based construction activities, in this case the driving of the pier piles.

Additionally, following further design development for the proposed pier and prior to TRPA permit acknowledgement, the project applicant would develop a communications plan with Edgewood Water Company that would incorporate details regarding pier construction/demolition techniques and a schedule for such activities. The communications plan with Edgewood Water Company would also assess whether there is the need for additional turbidity monitoring. If additional turbidity monitoring were required and the monitoring revealed an exceedance of established turbidity standards, then the pier construction would cease until that time that appropriate corrective actions were implemented (such as temporarily taking the intake line off line and relying on existing storage volume to serve existing customers, or additional turbidity barriers), as determined by Edgewood Water Company and the project applicant. The project applicant would provide TRPA with documentation of the communications plan with Edgewood Water Company prior to TRPA permit acknowledgement. This impact is considered **less than significant**.

Section 5.6, Hydrology and Water Quality, on page 5.6-31, the third full paragraph is revised as follows:

Projects within 600 feet of a drinking water source identified by TRPA require special consideration as described in Section 60.3 of the TRPA Code and are afforded protection under the Lake Tahoe Source Water Protection Program. There are ~~four~~^{three} protected drinking water sources within 600 feet of the project area boundaries: the Edgewood Water Company (EWC) intake line (00703003111) that extends into Lake Tahoe from a location north of the existing lakefront residences; the Kingsbury General Improvement District (KGID) intake line (00709005111); and two active wells (02903603W11 and 02905101W11) south of the project area boundary near golf hole 9 in California (TRPA 2000). The mouth of the KGID water intake line is located well over 600 feet from the proposed pier and public beach area associated with the proposed project (and about 900 feet from the project area boundary), but from the point where the intake line extends lakeward from the beach the line is within approximately 450 feet of the northernmost project area boundary. Prior to acknowledgement issuance of the TRPA permit, the project applicant would be required to comply with the source water protection provisions contained in Section 60.3.3.D of the TRPA Code. The creation of a new potential contamination source (PCS) related to microbial contamination would require additional monitoring as outlined in NAC 445A.5195. The proposed public beach is a microbial PCS, as noted in Section 60.3.5 of the TRPA Code.

Specifically, the project applicant is required to prepare a spill control plan for TRPA review and approval. In accordance with Section 60.3.3.D(3), the plan shall include the following elements:

- a. Disclosure element describing the types, quantities, and storage locations of contaminants commonly handled as part of the proposed project;
- b. Contaminant handling and spill prevention element;
- c. Spill reporting element, including a list of affected agencies to be contacted in the event of a spill;
- d. Spill recovery element; and
- e. Spill clean-up element.

For the well sites south of the site, the proposed project would not bring fertilized turf areas closer than they are today and therefore is not considered to create a possible contaminating activity. The project is expected to result in reduced fertilizer application (Impact 5.3.1-10) at levels that could improve groundwater conditions. For these reasons, the project would not be expected to cause degradation of these drinking water sources.

Section 5.6, Hydrology and Water Quality, on page 5.6-32, the first paragraph is revised as follows:

The mouth of the EWC primary water supply intake is located over 2,000 feet from the closest point of the proposed pier and the proposed public beach at a depth of 34 feet, and an adjacent parallel back-up water intake is located over 700 feet from the beach. The mouth of the KGID water intake line is approximately 3,150 feet (more than one-half mile) from the closest point of the proposed pier and 3,250 feet from the closest part of the proposed public beach at Edgewood. The depth of the water intake line is 60 feet. These distances from the shoreline, combined with the depths of the intakes is sufficient to protect source water quality of the intakes. More specifically, as documented in the source water evaluation memorandums included in Appendix K to this EIS, the risk of exceeding the U.S. EPA's target risk level of 1 infection per 10,000 visitors (i.e., drinking water customers) per year from body-contact recreation would be less than 0.1%. This impact is considered **less than significant**.

Section 5.10, Traffic, Parking, and Circulation, beginning on page 5.10-24, Impact 5.10.1-5 is revised as follows:

Impact 5.10.1-5	Vehicle Miles Traveled (VMT). Alternative 1 would result in an increase of approximately 622501 VMT over the course of a peak summer day, or a 0.03-percent increase in existing region-wide VMT. Based on Subsection 65.2.4(C) of the TRPA Code of Ordinances, an air quality mitigation fee <u>and/or in lieu mitigation measures would be required for the new trips generated by Alternative 1 of \$8,434.60 is required.</u> Because the increase in VMT resulting from Alternative 1 is not substantial in relation to the VMT threshold, this impact is less than significant .
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The effect of Alternative 1 on VMT is dependent on the origin and destination of persons traveling to and from the site. Project-related VMT is estimated based on project trip generation and estimated average trip lengths. The increase in VMT resulting from implementation Alternative 1 is estimated based upon the trip types and average trip lengths identified in the TRPA regional transportation model, and the net increase in regional vehicle trips generated by Alternative 1. The VMT calculations are presented in Table 5.10-9. As shown, the existing uses at the project site are estimated to generate approximately 7,494 VMT over the course of a peak day. With implementation of Alternative 1, the existing plus proposed uses would generate a total of approximately 15,~~353232~~ VMT.

None of the proposed lodging/residential units would be “new” development in the South Shore area. A total of 194 TAUs would be transferred from sending parcels located in the South Lake Tahoe area. As shown in Table 5.10-9, the sending parcels are estimated to have the potential to generate approximately 7,237 VMT in the Tahoe Basin over the course of a peak day. Subtracting the existing VMT at the project site (7,494) and the VMT potential associated with the TAU sending parcels (7,237) from the VMT with Alternative 1 (15,~~353232~~) yields a net increase of up to ~~622501~~ VMT under Alternative 1 on a peak summer day. In comparison with TRPA's most recent assessment of VMT in the Tahoe Basin (Norberg, pers. comm., 2011), Alternative 1 is estimated to increase region-wide VMT by approximately 0.03 percent.

Pursuant to Subsection 65.2.4(C) of the TRPA Code, projects that include additional or transferred development are required to offset their potential traffic and air quality impacts. For projects that would generate additional development (net new trips), the project applicant is required to either: (1) contribute to the Air Quality Mitigation Fund in an amount determined by TRPA; or (2) provide mitigation measures in lieu of a contribution to the Air Quality Mitigation Fund that is equal to or greater than the contribution amount that would otherwise apply. Subsection 65.2.4(C)(2) of the TRPA Code identifies that in lieu mitigation measures may include, but are not limited to: (a) transit facility construction; (b) transportation systems management measures, including, but not limited to, bicycle facilities, pedestrian facilities, and use of alternative fuels in fleet vehicles; or (c) transfer

and retirement of offsite development rights. The Air Quality Mitigation Fund provides a mechanism to finance regional and cumulative mitigation measures such as those listed above.

The Air Quality Mitigation fee schedule is included in Section 10.8.5(A)(1) of the TRPA Rules of Procedure. The current fee schedule identifies that ~~an air quality mitigation fee of \$36.20 per daily vehicle trip end is required for new trips associated with the non-residential land uses and \$325.84 per daily vehicle trip end for new trips associated with residential land uses and tourist accommodation units, to “offset the potential traffic and air quality impacts” of a project. The Air Quality Mitigation Fund provides for regional and cumulative mitigation measures that may include, but are not limited to:~~

- ~~▲ transit facility construction;~~
- ~~▲ Transportation Systems Management (TSM) measures, including, but not limited to, bicycle facilities, pedestrian facilities, and use of alternative fuels in fleet vehicles; or~~
- ~~▲ transfer and retirement of off-site development rights.~~

As Alternative 1 would result in additional development and a net increase in vehicle trips in the region ~~an increase of 233 vehicle trips in the region, all of which are associated with non-residential uses. At \$36.20 per trip, TRPA would assess an air quality mitigation, the air quality mitigation fee, and/or recognize in lieu mitigation measures equal to or greater than the air quality mitigation fee amount, as provided in Subsection 65.2.4(C) of the TRPA Code at the time of project approval and permit issuance. associated with this increase is calculated to be \$8,434.60.~~

As the net increase in region-wide VMT resulting from Alternative 1 (~~622501~~) is not substantial in relation to the Regional Plan threshold, this impact is considered **less than significant**.

Table 5.10-9. Alternative 1 – Vehicle Miles Traveled (VMT) Calculations				
Land Use	TRPA Trip Type ¹	Daily Vehicle Trip Ends (DVTE) ²	Average Trip Length (mi) ³	VMT
Existing Land Uses				
Golf Course	Average of All HBR, NHB, and RHBW	673	3.92	2,636
Clubhouse				
Edgewood Restaurant	Average of All HBO, NHB, and RHBW	214	3.47	742
Brooks Bar	Average of All HBO, NHB, and RHBW	708	3.47	2,454
North Banquet Room	Average of All HBO, NHB, and RHBW	320	3.47	1,109
South Banquet Room	Average of All HBO, NHB, and RHBW	128	3.47	444
Banquet Employees	Average of RHBW and RNHB	13	3.13	41
<i>Total Clubhouse</i>		<i>1,383</i>		<i>4,790</i>
Single-Family Residences	Average of All Resident Home-Based Trips	19	3.60	68
<i>Total Existing Development</i>		<i>2,075</i>		<i>7,494</i>
Proposed Land Uses				
Lodge				
Hotel	Average of All Visitor Types Except NHB, RHBW, and RNHB	886	5.58	4,940
Multiple-Bedroom Units	Average of All Visitor Types Except NHB, RHBW, and RNHB	272	5.58	1,517
<i>Subtotal Lodging Units</i>		<i>1,158</i>		<i>6,457</i>
Health Spa	Average of All HBR, NHB, and RHBW	40	3.92	157
Lodge Restaurant	Average of All HBO, NHB, and RHBW	36	3.47	125

Table 5.10-9. Alternative 1 – Vehicle Miles Traveled (VMT) Calculations				
Lodge Bar	Average of All HBO, NHB, and RHBW	16	3.47	55
Lodge Banquet Room	Average of All HBO, NHB, and RHBW	324	3.47	1,123
Lodge Banquet Employees	Average of RHBW and RNHB	18	3.13	56
<i>Subtotal Lodge Amenities</i>		434		1,516
<i>Total Lodge</i>		1,592		7,973
Golf Course	Average of All HBR, NHB, and RHBW	548	3.92	2,146
Clubhouse				
Edgewood Restaurant	Average of All HBO, NHB, and RHBW	200	3.47	693
Brooks Bar	Average of All HBO, NHB, and RHBW	567	3.47	1,965
North Banquet Room	Average of All HBO, NHB, and RHBW	324	3.47	1,123
South Banquet Room	Average of All HBO, NHB, and RHBW	259	3.47	898
Clubhouse Banquet Employees	Average of RHBW and RNHB	17	3.13	53
<i>Subtotal Clubhouse</i>		1,367		4,732
Public Beach and Pier	Average of All HBR, NHB, and RHBW	80	3.92	313
Single-Family Residences	Average of All Resident Home-Based Trips	19	3.60	68
Shuttle Vehicle Trips	Average trip to casino corridor, Heavenly Village, etc.	96	1.26	121
Total Proposed Development		3,702606		15,353223
Net Impact at Project Site with Alternative 1 (Proposed Minus Lodging Units Minus Shuttle Vehicle Trips Minus Existing Land Uses)		373		
Units to be Transferred from Other Parcels				
Carousel Motel	Average of All Visitor Types Except NHB, RHBW, and RNHB	148	5.58	825
Thunderbird Motel	Average of All Visitor Types Except NHB, RHBW, and RNHB	109	5.58	608
Tahoe Beach and Ski Club	Average of All Visitor Types Except NHB, RHBW, and RNHB	422	5.58	2,353
Colony Inn	Average of All Visitor Types Except NHB, RHBW, and RNHB	186	5.58	1,037
C&M Lodge	Average of All Visitor Types Except NHB, RHBW, and RNHB	433	5.58	2,414
<i>Total Units to be Transferred</i>		1,298		7,237
Impact of Alternative 1 on Tahoe Region (Proposed Minus Existing Minus Transferred)		329233		622501
Region Wide VMT⁴				1,987,794
Percent Increase Due to Alternative 1				0.03%
¹ HBR = Home Based Recreation, NHB = Non-Home Based, RHBW = Resident Home Based Work, HBO = Home Based Other, RNHB = Resident Non-Home Based. ² Reference Trip Generation Tables 5.10-4 and 5.10-5. ³ Based on TRPA's 1995 TRANPLAN Trip Length data. ⁴ Based on TRPA 2010 TransCAD Model. Source: LSC Transportation Consultants, Inc. 2012				

Mitigation Measure

No mitigation is required.

Section 5.10, Traffic, Parking, and Circulation, beginning on page 5.10-41, Impact 5.10.2-5 is revised as follows:

Impact 5.10.2-5 Vehicle Miles Traveled (VMT). Alternative 2 would result in a net increase of approximately ~~306,185~~ VMT over the course of a peak summer day, or a ~~0.024~~ percent increase in existing region-wide VMT. In comparison with Alternative 1, Alternative 2 would generate a smaller increase in existing region-wide VMT. Based on Subsection 65.2.4(C) of the TRPA Code, an air quality mitigation fee and/or in lieu mitigation measures would be required for the new trips generated by Alternative 2 that contribute to this increase in VMT of \$3,221.80 is required. As the increase in VMT resulting from Alternative 2 is not substantial in relation to the VMT threshold, this impact is **less than significant**.

The effect of Alternative 2 on VMT is summarized in Table 5.10-15. With implementation of Alternative 2, the existing plus proposed uses would generate a total of approximately ~~16,113,992~~ VMT.

None of the proposed lodging units would be “new” development in the South Shore area. A total of 230 TAUs would be transferred from sending parcels located in the South Lake Tahoe area. As shown in Table 5.10-15, the sending parcels are estimated to have the potential to generate approximately 8,313 VMT in the Tahoe Basin. Subtracting the existing VMT at the project site (7,494) and the VMT potential associated with the TAU sending parcels (8,313) from the VMT with Alternative 2 (~~16,113,992~~) yields a net increase of up to ~~306,185~~ VMT on a peak summer day. In comparison with the TRPA’s most recent assessment of approximately 1,987,794 existing VMT in the Tahoe Basin (Norberg, pers. comm., 2011), Alternative 2 is estimated to increase region-wide VMT by approximately ~~0.024~~ percent. In comparison with Alternative 1, Alternative 2 would generate a smaller (approximately ~~0.012~~ percent lower) increase in existing region-wide VMT, given that Alternative 2 would result in a smaller increase in daily vehicle trips in the region.

As Alternative 2 would result in additional development and a net increase in vehicle trips in the region that increase VMT, TRPA would assess an air quality mitigation fee, or recognize in lieu mitigation measures equal to or greater than the air quality mitigation fee amount, as provided in Subsection 65.2.4(C) of the TRPA Code at the time of project approval and permit issuance. ~~Pursuant to Subsection 65.2.4(C) of the TRPA Code, an air quality mitigation fee of \$36.20 per daily vehicle trip end is required for new trips associated with the non-residential land uses and \$325.84 per daily vehicle trip end for new trips associated with residential land uses. Alternative 2 would result in a net increase of 89 daily vehicle trips in the region, all of which are associated with non-residential uses. At \$36.20 per trip, the air quality mitigation fee associated with this increase is calculated to be \$3,221.80.~~

As the net increase in region-wide VMT resulting from Alternative 2 (~~306,185~~) is not substantial in relation to the Regional Plan threshold, this impact is considered **less than significant**.

Mitigation Measure

No mitigation is required.

Table 5.10-15. Alternative 2 – Vehicle Miles Traveled (VMT) Calculations				
Land Use	TRPA Trip Type ¹	Daily Vehicle Trip Ends (DVTE) ²	Average Trip Length (mi) ³	VMT
Existing Land Uses				
Golf Course	Average of All HBR, NHB, and RHBW	673	3.92	2,636
Clubhouse				
Edgewood Restaurant	Average of All HBO, NHB, and RHBW	214	3.47	742

Brooks Bar	Average of All HBO, NHB, and RHBW	708	3.47	2,454
North Banquet Room	Average of All HBO, NHB, and RHBW	320	3.47	1,109
South Banquet Room	Average of All HBO, NHB, and RHBW	128	3.47	444
Banquet Employees	Average of RHBW and RNHB	13	3.13	41
<i>Total Clubhouse</i>		<i>1,383</i>		<i>4,790</i>
Single-Family Residences	Average of All Resident Home-Based Trips	19	3.60	68
<i>Total Existing Development</i>		<i>2,075</i>		<i>7,494</i>
Proposed Land Uses				
Lodge				
Hotel	Average of All Visitor Types Except NHB, RHBW, and RNHB	708	5.58	3,948
Multiple-Bedroom Units	Average of All Visitor Types Except NHB, RHBW, and RNHB	729	5.58	4,065
<i>Subtotal Lodging Units</i>		<i>1,437</i>		<i>8,013</i>
Health Spa	Average of All HBR, NHB, and RHBW	44	3.92	172
Lodge Restaurant	Average of All HBO, NHB, and RHBW	40	3.47	139
Lodge Bar	Average of All HBO, NHB, and RHBW	37	3.47	128
Lodge Banquet Room	Average of All HBO, NHB, and RHBW	324	3.47	1,123
Lodge Banquet Employees	Average of RHBW and RNHB	18	3.13	56
<i>Subtotal Lodge Amenities</i>		<i>463</i>		<i>1,618</i>
<i>Total Lodge</i>		<i>1,900</i>		<i>9,631</i>
Golf Course	Average of All HBR, NHB, and RHBW	548	3.92	2,146
Clubhouse				
Edgewood Restaurant	Average of All HBO, NHB, and RHBW	200	3.47	693
Brooks Bar	Average of All HBO, NHB, and RHBW	567	3.47	1,965
North Banquet Room	Average of All HBO, NHB, and RHBW	324	3.47	1,123
South Banquet Room	Average of All HBO, NHB, and RHBW	<u>0</u>	3.47	<u>0</u>
Clubhouse Banquet Employees	Average of RHBW and RNHB	17	3.13	53
<i>Subtotal Clubhouse</i>		<i>1,108</i>		<i>3,834</i>
Public Beach and Pier	Average of All HBR, NHB, and RHBW	80	3.92	313
Single-Family Residences	Average of All Resident Home-Based Trips	19	3.60	68
Shuttle Vehicle Trips	Average trip to casino corridor, Heavenly Village, etc.	<u>96</u>	<u>1.26</u>	<u>121</u>
Total Proposed Development		<u>3,751,655</u>		<u>16,113,159</u>
Units to be Transferred from Other Parcels ⁵		1,491	5.58	8,313
Net Impact at Project Site with Alternative 2 (Proposed Minus Lodging Units Minus Shuttle Vehicle Trips Minus Existing Land Uses)		<u>143</u>		
Net Increase in Region-Wide VMT with Alternative 2 (Proposed Minus Existing Minus Transferred)		<u>18589</u>		<u>306,185</u>
Region Wide VMT ⁴				1,987,794
Percent Increase Attributable to Alternative 2				0.021%
¹ HBR = Home Based Recreation, NHB = Non-Home Based, RHBW = Resident Home Based Work, HBO = Home Based Other, RNHB = Resident Non-Home Based. ² Reference Trip Generation Table ³ Based on TRPA's 1995 TRANPLAN Trip Length data. ⁴ Based on TRPA 2010 TransCAD Model. ⁵ Units to be transferred includes all of the units for the preferred alternative. Trip generation of remaining units is based on hotel land use and high transit use (near Stateline area). Source: LSC Transportation Consultants, Inc. 2012				

Section 5.10, Traffic, Parking, and Circulation, beginning on page 5.10-54, Impact 5.10.3-5 is revised as follows:

Impact 5.10.3-5 Vehicle Miles Traveled (VMT). Alternative 3 would result in a net increase of approximately 1,342,221 VMT over the course of a peak summer day, or a 0.076-percent increase in existing region-wide VMT. In comparison with Alternative 1, Alternative 3 would generate a slightly higher increase in existing region-wide VMT. Based on Subsection 65.2.4(C) of the TRPA Code of Ordinances, an air quality mitigation fee and/or in lieu mitigation measures would be required for the new trips generated by Alternative 3 of \$13,502.60 is required. As the increase in VMT resulting from Alternative 3 is not substantial in relation to VMT, this impact is **less than significant**.

The effect of Alternative 3 on VMT is summarized in Table 5.10-21. With implementation of Alternative 3, the existing plus proposed uses would generate a total of approximately 17,746~~25~~ VMT.

None of the proposed lodging units would be “new” development in the South Shore area. A total of 250 TAUs would be transferred from sending parcels located in the South Lake Tahoe area. As shown in Table 5.10-21, the sending parcels are estimated to have the potential to generate approximately 8,910 VMT in the Tahoe Basin. Subtracting the existing VMT at the project site (7,494) and the VMT potential associated with the TAU sending parcels (8,910) from the VMT with Alternative 3 (17,746~~25~~) yields a net increase of up to 1,342,221 VMT on a peak summer day. In comparison with the TRPA’s most recent assessment of approximately 1,987,794 existing VMT in the Tahoe Basin, Alternative 3 is estimated to increase region-wide VMT by approximately 0.076 percent. In comparison with Alternative 1, Alternative 3 would generate a slightly higher (approximately 0.043 percent) increase in existing region-wide VMT.

As Alternative 3 would result in additional development and a net increase in vehicle trips in the region, TRPA would assess an air quality mitigation fee, and/or recognize in lieu mitigation measures equal to or greater than the air quality mitigation fee amount, as provided in Subsection 65.2.4(C) of the TRPA Code at the time of project approval and permit issuance. Pursuant to Subsection 65.2.4(C) of the TRPA Code, an air quality mitigation fee of \$36.20 per daily vehicle trip end is required for new trips associated with the non-residential land uses and \$325.84 per daily vehicle trip end for new trips associated with residential land uses. Alternative 3 would result in a net increase of 373 daily vehicle trips in the region, all of which are associated with non-residential uses. At \$36.20 per trip, the air quality mitigation fee associated with this increase is calculated to be \$13,502.60.

As the increase in VMT resulting from Alternative 3 (1,342,221) is not substantial in relation to the Regional Plan threshold, this impact is considered **less than significant**.

Mitigation Measure

No mitigation is required.

Table 5.10-21. Alternative 3 – Vehicle Miles Traveled (VMT) Calculations				
Land Use	TRPA Trip Type ¹	Daily Vehicle Trip Ends (DVTE) ²	Average Trip Length (mi) ³	VMT
Existing Land Uses				
Golf Course	Average of All HBR, NHB, and RHBW	673	3.92	2,636
Clubhouse				
Edgewood Restaurant	Average of All HBO, NHB, and RHBW	214	3.47	742
Brooks Bar	Average of All HBO, NHB, and RHBW	708	3.47	2,454
North Banquet Room	Average of All HBO, NHB, and RHBW	320	3.47	1,109

South Banquet Room	Average of All HBO, NHB, and RHBW	128	3.47	444
Banquet Employees	Average of RHBW and RNHB	13	3.13	41
<i>Total Clubhouse</i>		<i>1,383</i>		<i>4,790</i>
Single-Family Residences	Average of All Resident Home-Based Trips	19	3.60	68
<i>Total Existing Development</i>		<i>2,075</i>		<i>7,494</i>
Proposed Land Uses				
Lodge				
Hotel	Average of All Visitor Types Except NHB, RHBW, and RNHB	731	5.58	4,076
Multiple-Bedroom Units	Average of All Visitor Types Except NHB, RHBW, and RNHB	838	5.58	4,672
<i>Subtotal Lodging Units</i>		<i>1,569</i>		<i>8,748</i>
Health Spa	Average of All HBR, NHB, and RHBW	44	3.92	172
Lodge Restaurant	Average of All HBO, NHB, and RHBW	40	3.47	139
Lodge Bar	Average of All HBO, NHB, and RHBW	37	3.47	128
Lodge Banquet Room	Average of All HBO, NHB, and RHBW	324	3.47	1,123
Lodge Banquet Employees	Average of RHBW and RNHB	18	3.13	56
<i>Subtotal Lodge Amenities</i>		<i>463</i>		<i>1,618</i>
<i>Total Lodge</i>		<i>2,032</i>		<i>10,366</i>
Golf Course	Average of All HBR, NHB, and RHBW	548	3.92	2,146
Clubhouse				
Edgewood Restaurant	Average of All HBO, NHB, and RHBW	200	3.47	693
Brooks Bar	Average of All HBO, NHB, and RHBW	567	3.47	1,965
North Banquet Room	Average of All HBO, NHB, and RHBW	324	3.47	1,123
South Banquet Room	Average of All HBO, NHB, and RHBW	259	3.47	898
Clubhouse Banquet Employees	Average of RHBW and RNHB	17	3.13	53
<i>Subtotal Clubhouse</i>		<i>1,367</i>		<i>4,732</i>
Public Beach and Pier	Average of All HBR, NHB, and RHBW	80	3.92	313
Single-Family Residences	Average of All Resident Home-Based Trips	19	3.60	68
Shuttle Vehicle Trips	Average trip to casino corridor, Heavenly Village, etc.	<u>96</u>	<u>1.26</u>	<u>121</u>
Total Proposed Development		<u>4,142</u>		<u>17,746</u>
Units to be Transferred from Other Parcels⁵		1,598	5.58	8,910
Net Impact at Project Site with Alternative 3 (Proposed Minus Lodging Units Minus Shuttle Vehicle Trips Minus Existing Land Uses)		<u>402</u>		
Net Increase in Region-Wide VMT with Alternative 3² (Proposed Minus Existing Minus Transferred)		<u>469</u>		<u>1,342</u>
Region Wide VMT⁴				1,987,794
Percent Increase Attributable to Alternative 3²				0.076%
¹ HBR = Home Based Recreation, NHB = Non-Home Based, RHBW = Resident Home Based Work, HBO = Home Based Other, RNHB = Resident Non-Home Based. ² Reference Trip Generation Table ³ Based on TRPA's 1995 TRANPLAN Trip Length data. ⁴ Based on TRPA 2010 TransCAD Model. ⁵ Units to be transferred includes all of the units for the preferred alternative. Trip generation of remaining units is based on hotel land use and high transit use (near Stateline area). Source: LSC Transportation Consultants, Inc.2012				

Section 5.14, Public Services and Utilities, on page 5.14-10, second paragraph, is revised as follows:

The proposed project site would likely be served by EWC's water system via an the existing 12-inch water supply line. The 12-inch water supply line that extends through the project site with connections from the main line to proposed onsite uses would be relocated along the realigned entry road. To the extent feasible, new utilities

would be located under existing or proposed roadways and appropriate utility easements would be finalized as part of the permitting process. Modifications to the water system, including new water distribution lines, would be subject to NDEP, Bureau of Safe Drinking Water review pursuant to NAC 445A.6669. The existing 12-inch water supply line connects to a larger main on the Horizon property. EWC has indicated that the existing 12-inch water supply line or portions thereof either on or off site may need to be replaced as part of the proposed project (King, pers. comm., 2011). Further studies are needed, which would not commence until latter stages of design, to determine the need for the water supply line replacement. For the purposes of this EIS, it is assumed that the 12-inch water line would not need to be replaced. If determined to be necessary during final design, any the pipeline replacement occurring outside of the proposed project area would be subject to separate and subsequent ~~environmental~~ review and permitting by TRPA, Douglas County, and EWC. If an upsizing of the proposed water supply line within the proposed project area were required, it would occur within the entry road alignment already evaluated as part of this EIS. ~~If replacement were required, it would be within the existing footprint and would include trenching techniques that could result in temporary air quality, noise, traffic, and water quality impacts. The types of temporary construction impacts would be similar to those discussed and analyzed in this EIS.~~

Pursuant to NAC 445A.66615, water system improvements would be constructed in a manner that would maintain a reliable supply of water to existing EWC customers during construction. The water system improvements contemplated with the proposed project would involve the realignment of both raw water lines and water supply lines for EWC. Typical of a project of this nature, this would be accomplished by constructing the new facility infrastructure before taking the existing infrastructure offline. Once constructed and tested, the new utility lines would be brought on line by switching the system to the new lines without disruption to EWC customers. The construction plans and methods for activating the new lines would be subject to NDEP, Bureau of Safe Drinking Water review and oversight.

Appendix D, Scenic Resources Materials: Contrast Rating Analysis, Visual Simulation Methodology Memorandum, and Lighting Plan and Details, is revised and reproduced in its entirety as an appendix to this Final EIS to incorporate the updated contrast rating analysis spreadsheets that reflect the removal of the two initially proposed trees and tall shrubs from in front of the clubhouse that are not required and could otherwise disrupt views from the clubhouse towards Lake Tahoe.



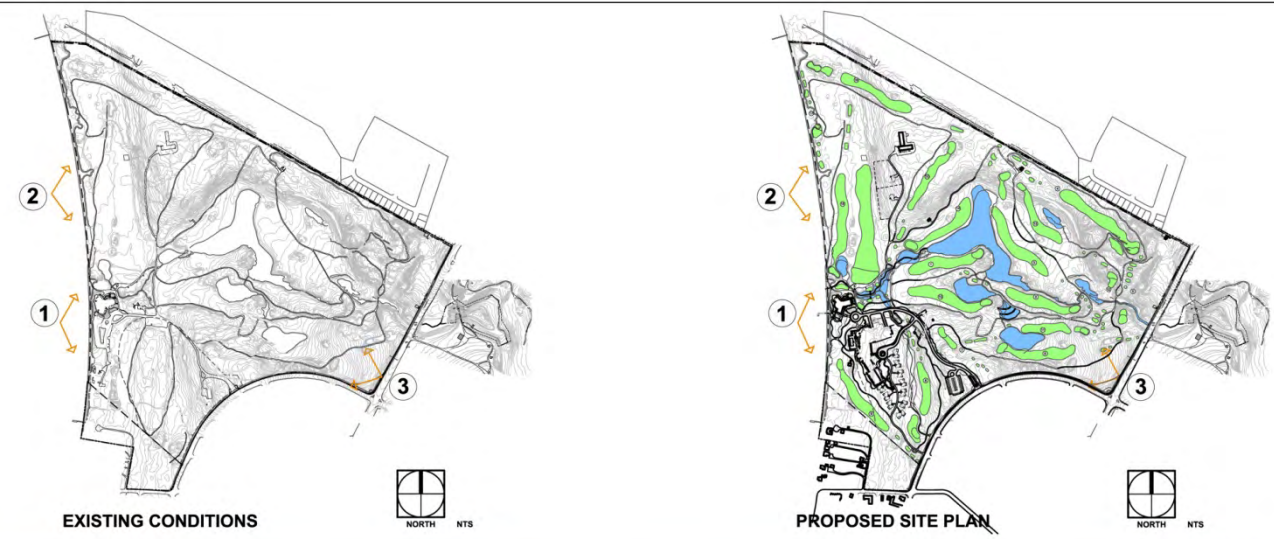
3 - VIEW FROM CLUBHOUSE LAWN



2 - VIEW FROM CLUBHOUSE LAWN (WITH HEIGHT AMENDMENT)



1 - VIEW SIMULATION FROM LAKE (WITH HEIGHT AMENDMENT)



1 EXISTING CONDITIONS
View from Lake Tahoe at Visual Simulation Point 1



1 PROPOSED LODGE
View from Lake Tahoe at Visual Assessment Point 1

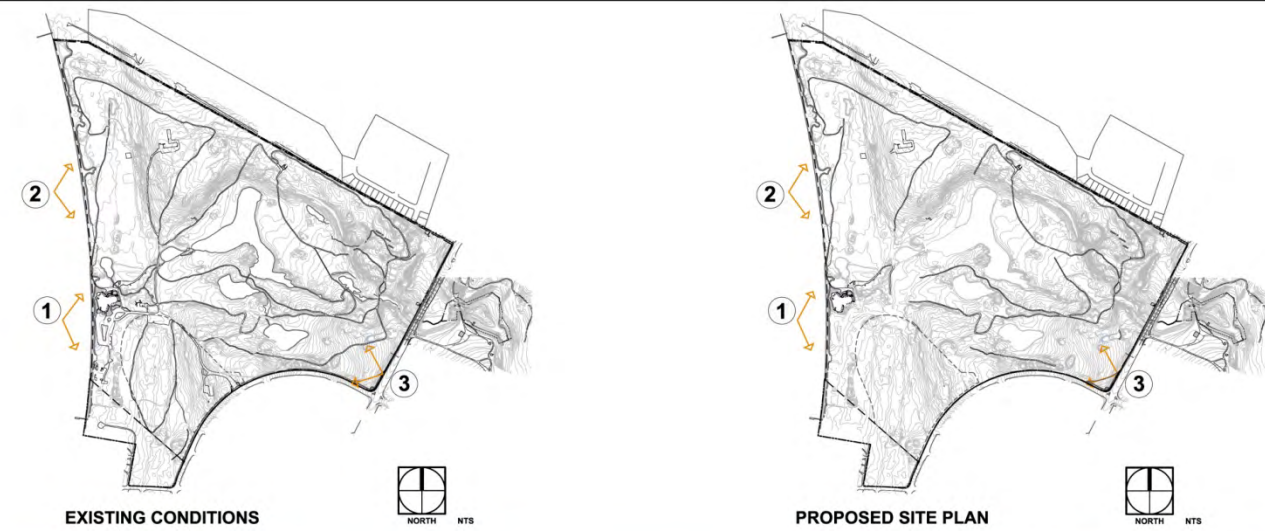
X10010039 01 035

Source: Design Workshop, CCY Architects, Nichols Consulting Engineers, 2012

Exhibit 5.3-4e

Existing and Simulated View of Alternative 1B from Lake Tahoe, Viewpoint 1 (South of Existing Clubhouse)





1 EXISTING CONDITIONS
View from Lake Tahoe at Visual Simulation Point 1



1 PROPOSED LODGE
View from Lake Tahoe at Visual Assessment Point 1

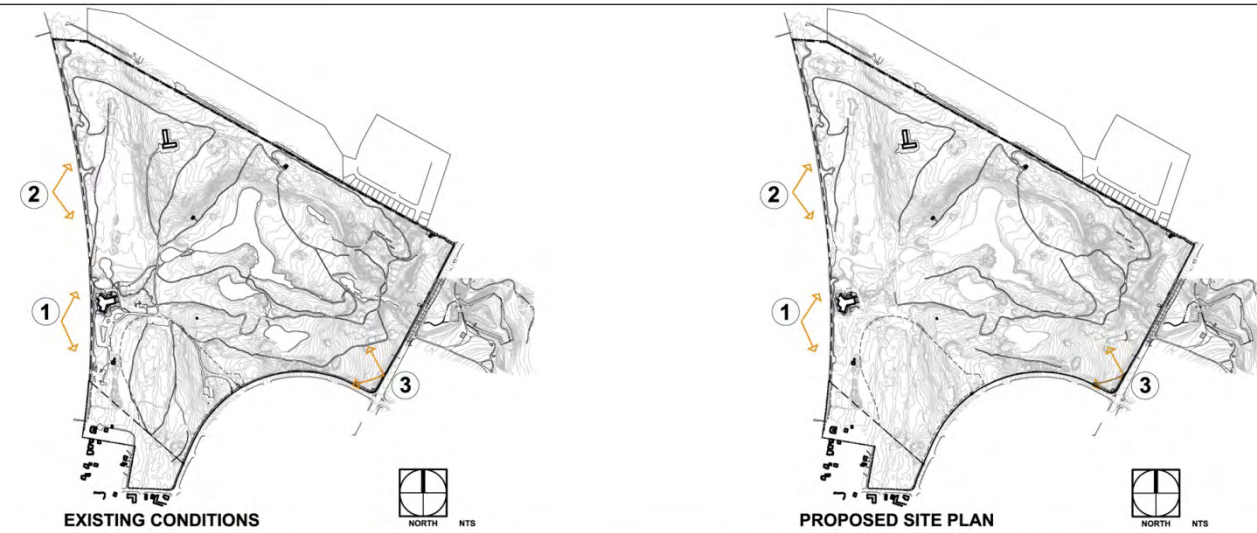
X10010039 01 040

Source: Design Workshop, CCY Architects, Nichols Consulting Engineers, 2012

Exhibit 5.3-5a

Existing and Simulated View of Alternative 2 from Lake Tahoe, Viewpoint 1 (South of Existing Clubhouse)





1 EXISTING CONDITIONS
View from Lake Tahoe at Visual Simulation Point 1



1 PROPOSED LODGE
View from Lake Tahoe at Visual Assessment Point 1

X10010039 01 043

Source: Design Workshop, CCY Architects, Nichols Consulting Engineers, 2011

Exhibit 5.3-6a

Existing and Simulated View of Alternative 3 from Lake Tahoe, Viewpoint 1 (South of Existing Clubhouse)



4 REFERENCES

Anderson, Rob, P.E., W.R.S., CFM. Principal Engineer. RO Anderson, Minden, Nevada. November 4, 2011—letter to Bobby King, General Manager at Edgewood Water Company regarding a comparative review of the results of the Lake Tahoe Source Water Protection Risk Assessment dated October 2008 prepared by Black & Veatch in conjunction with the Tahoe Water Suppliers' Association and the U.S. Army Corps of Engineers.

———. July 19, 2012—letter to Theresa Avance, Senior Planner at TRPA regarding responses to Draft EIS comments from the Tahoe Waters Suppliers Association and the State of Nevada, Division of Environmental Protection – Bureau of Safe Drinking Water.

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Appendix D

Scenic Resource Materials

Contrast Rating Analysis

Design Workshop, Inc.
Landscape Architecture
Land Planning
Urban Design
Strategic Services

Memorandum

To: Edgewood Team
From: Richard Shaw
Date: 09/16/2011
Project Name: Edgewood Lodge
Project #: 3977
Subject: Edgewood Lodge & Golf Visual
Magnitude Study

The included documents support the Edgewood Lodge project and the ongoing environmental review. The following is provided with regard to the Visual Magnitude Rating.

The methodology used is defined by the TRPA's "Baseline Scenic Conditions Assessment for Shoreland and Shorezone Projects." Additionally "Appendix G: Approved TRPA range of earthtone colors" was used. These documents reinforce the method to establish and assess the project proposal with consideration of the visual review.

A baseline contrast rating was established for the length of the shorezone within the project area. The following process was used:

1. The baseline scenic condition for the clubhouse and adjacent walkway was established and approved by TRPA on 7/11/2007 (see attached Exhibit A)
2. The baseline scenic condition for the two existing homes was established using the following process:
 - a. Elevations of the existing structures and associated screening vegetation within the shoreland were created.
 - b. The elevations were then used to quantify the amount of the different materials visible from the lake, as well as to determine the percentage of visible perimeter.
 - c. Corresponding Munsell colors, and their color and reflectance ratings, were selected for each of the materials based upon photographs of the structures.
 - d. Texture ratings were determined through evaluation of the photographs.
 - e. Material quantities, Munsell colors, color & reflectance ratings, and texture scores were then inserted into the TRPA contrast rating sheet thus rendering contrast ratings for each proposed structure:
 - i. House #1 = 17
 - ii. House #2 = 21
3. A composite contrast rating of 20 was then determined by determining the percentage of overall visible area attributed to each structure (including the clubhouse and walkway),

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multiplying the resulting percentages by the respective contrast ratings, and then totaling the resulting figures.

4. A linear foot of the shoreline was determined by measuring the length of the parcel boundary along the lake front.

Notes:

- All baseline information for the clubhouse and walkway comes directly from the baseline study approved in 2007. Additions to that approved assessment include only baseline assessment for existing home lots and proposed activity associated with the new project.
- The elevations for all improvement in the shoreland and shorezone were developed and measured using AutoCAD.

CONTRAST RATING SHEET

House #1

	Roof	Wall	Exposed Wood	Wood Fascia	Glazing	Door	Window Trim	Total Lakefront Façade
Area SF	560.3	922.1	91.8	357.9	442.9	47.3	80.5	2502.8
Percentage	22.4%	36.8%	3.7%	14.3%	17.7%	1.9%	3.2%	
Color and Relectance Rating¹	x	x	x	x	x	x	x	
Munsell Color for surface and Reflectance for glass	Gley2 5/5B	2.5YR 6/6	10YR 7/1	10YR 7/1	>15%	10YR 7/1	10YR 7/1	
	2.0	1.1	0.0	0.1	0.2	0.0	0.0	3.4
Percentage	22%	37%	4%	14%	18%	2%	3%	
Surface Plane/Texture Score²	x	x	x	x	x	x	x	
Texture # of Planes: 2	7	6	7	7	5	5	5	=
	Moderate	Minimal	Moderate	Moderate	None	None	None	
	1.54	2.22	0.28	0.98	0.9	0.1	0.15	6.2
								+
Percent of Perimeter Visible: 35% 111' of 317'								Perimeter Score³ = 7
								CONTRAST RATING = 17

CONTRAST RATING SHEET

House #2

	Roof	Wall	Exposed Wood	Wood Fascia	Glazing	Brick	Fence Poles	Door	Window Trim	Mechanical	Total Lakefront Façade
Area SF	352.0	271.7	43.6	80.6	237.4	32.4	45.8	23.6	29.4	4.2	1120.7
Percentage	31.4%	24.2%	3.9%	7.2%	21.2%	2.9%	4.1%	2.1%	2.6%	0.4%	
Color and Reflectance Rating ¹ Munsell Color for surface and Reflectance for glass	x	x	x	x	x	x	x	x	x	x	
	9	12	8	15	1	5	1	15	1	1	
	10YR 5/1	7.5YR 5/3	10YR 7/3	2.5YR 4/2	>15%	10R 6/6	Gley 1 7/N	2.5YR 4/2	Gley 1 8/N	Gley 1 8/N	
	2.8	2.9	0.3	1.1	0.2	0.1	0.0	0.3	0.0	0.0	7.7
Percentage	31%	24%	4%	7%	21%	3%	4%	2%	3%	0%	
Surface Plane/Texture Score ² Texture # of Planes: 10	x	x	x	x	x	x	x	x	x	x	
	8	6	7	6	5	8	5	5	5	5	+
	Heavy	Minimal	Moderate	Minimal	None	Heavy	None	None	None	None	
	2.5	1.4	0.3	0.4	1.1	0.2	0.2	0.1	0.2	0.0	6.4
											+
					Percent of Perimeter Visible: 37%	Perimeter Score ³					7
					105' of 287'	CONTRAST RATING					21

COMPOSITE CONTRAST RATING

	Clubhouse	House #1	House #2	Walkway					Total Lakefront Façade
Area SF	5954	2503	1121	645	0	0	0	0	10223
Percentage	58%	24%	11%	6%	0%	0%	0%	0%	
CONTRAST RATING	x	x	x	x	x	x	x	x	
	21	17	21	22	0	0	0	0	
	12.2	4.1	2.3	1.3	0.0	0.0	0.0	0.0	19.9
									20

	EXISTING
LAKEFRONT FAÇADE:	10,223
SCREENED AREA:	3,570
VISIBLE AREA:	6,653

VISIBLE S.F. ALLOWED	595
L.F. of Shoreline > 100'	3610
Possible Allowed Vis. S.F.	16705

This architectural section drawing illustrates a multi-story building with a central vertical circulation space, likely a staircase. The building is characterized by a series of rectangular windows of varying sizes and shapes, some of which are grouped together. The structure is surrounded by dense, stylized foliage, represented by hatched areas and irregular outlines, suggesting a garden or wooded setting. The drawing uses fine lines and hatching to create depth and texture, typical of traditional architectural illustrations.

Total Visible Lake View Elevation = 1,155.2 sf

Roof	= 560.3 sf	22.4%
Wall	= 922.1 sf	36.8%
Exposed Wood	= 91.8 sf	3.7%
Wood Fascia	= 357.9 sf	14.3%
Glazing	= 442.9 sf	17.7%
Door	= 47.3 sf	1.9%
Window Trim	= 80.5 sf	3.2%

Total Visible Lake View Elevation = 489.5 sf

Roof	= 352.0 sf	37.0%
Wall	= 271.7 sf	16.4%
Exposed Wood	= 43.6 sf	7.9%
Wood Fascia	= 80.6 sf	6.1%
Glazing	= 237.4 sf	18.3%
Brick	= 32.4 sf	4.9%
Fence Poles	= 45.8 sf	5.8%
Door	= 23.6 sf	2.0%
Window Trim	= 29.4 sf	1.6%
Mechanical	= 4.2 sf	0.4%

Exhibit A

Baseline Scenic Assessment for the Clubhouse and Walkway

Approved by TRPA 7/11/2007

TAHOE REGIONAL PLANNING AGENCY

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Stateline, Nevada
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Fax (775) 588-4527
Email: trpa@trpa.org

July 11, 2007

Angela Silva
Midkiff and Associates
P.O. Box 12427
Zephyr Cove, NV 89448

SUBJECT: REVISED SCENIC SHORELAND ASSESSMENT TO ESTABLISH BASELINE CONDITION, EDGEWOOD GOLF COURSE, 180 LAKE PARKWAY, APN 1318-27-001-001, DOUGLAS COUNTY, NEVADA. TRPA FILE NUMBER 20070205.

Dear Ms. Silva:

This letter is to inform you that the Tahoe Regional Planning Agency (TRPA) has verified the Baseline Scenic Shoreland Assessment on Assessor's Parcel Number (APN) 1318-27-001-001. TRPA has reviewed the contrast rating score information submitted with the application and calculated a **Composite Scenic Baseline Contrast Rating Score of 21**.

The baseline assessment fulfills the initial scenic requirement for a shoreland project by documenting the existing scenic baseline condition on the site and by identifying scenic impact mitigation measures that may be required for future projects. The information regarding scenic impact mitigation is intended to serve as a planning and design tool to assist you with designing future projects so that project proposals in the shoreland and shorezone meet the scenic quality ordinances. Section I of Attachment A contains suggested ways to improve your baseline score.

Please be aware that changes in vegetation, colors, measurements and visibility due to lack of maintenance, natural occurrences, fire, lot line adjustments, etc. may affect future site conditions. The visible area of your existing structure has also been verified and is detailed in Attachment A. This information will assist you in determining which level of review your future project may require and to plan accordingly. Section 30.15.C of the TRPA Code of Ordinances describes the levels of scenic review and mitigation that are required based on the level of activity or project (see Attachment B for overview). *Please note that this letter does not include verification of existing land coverage or existing shorezone structures.*

If you have any questions, please call.


Sincerely,



Chantal M. Charette
Assistant Planner
Environmental Review Services

Attachments:

- A: Contrast Rating Verification Worksheet
- B: Levels of Scenic Review and Mitigation Matrix
- C: Visible Magnitude Table



TRPA Executive Director/Designee

7.11.2007
Date

cc: Park Cattle Company
1300 Buckeye Rd. Suite A
Minden, NV 89423

Attachment A

I. Scenic Best Management Practices (BMPs) are mitigation measures that reduce the visual impact of structures. They can be implemented to increase the contrast rating of the structure in order to meet possible future requirements. The Visual Assessment Tool (Appendix H of TRPA Design Review Guidelines) can be used to test the design elements of scenic BMPs and how they may affect the Contrast Rating of the structure. Below is a list of recommended scenic BMPs:

- Increased texture in building materials
- Use of darker roofing, siding and/or paint (for unique site conditions where the dominant color in the background is gray or green, those colors may be used to reduce contrast with the natural environment.)
- Additional screening of perimeter/facade of structure
- Use of low reflectivity glass treatment
- Use of trellis and overhangs to create breaks and depth

In the case of your application reviewed herein, use of darker colors on exterior surfaces, changing the glass to that with a lower reflectance, and increased screening of the perimeter of existing structures may increase the contrast rating score.

II. Verified Contrast Rating Score Sheets. The TRPA-verified calculations for the subject property are included in the tables shown below. Please refer to these tables for the specific scoring as verified by TRPA. For additional information regarding the process for scoring each element, see the detailed instructions in the Baseline Scenic Assessment Application.

CONTRAST RATING SHEET

Edgewood Golf Course

Club House

	Rock Wall and Chimney	Glazing	Copper	Wood Siding and Fascia	Log Handrails and Beams	Slate Roof	Exposed Beams	Metal Handrails, Fan Exhaust & Chimney Cap	Concrete Stairs	Wood Window Trim			Total Lakefront Façade
Area SF	1095.0	1329.0	75.0	757.0	82.0	1687.0	232.0	83.0	128.0	486.0			= 5954
Percentage	18.4%	22.3%	1.3%	12.7%	1.4%	28.3%	3.9%	1.4%	2.1%	8.2%	0.0%	0.0%	
Color and Reflectance Rating ¹	X	X	X	X	X	X	X	X	X	X	X	X	
Munsell Color for surface and Reflectance for glass	5Y 6/1	>15%	Gley1 2.5/1	7.5YR 4/6	7.5YR 4/6	10R 4/2	7.5YR 5/6	GLEY2 2.5/5B	5Y 6/1	7.5YR 4/6			
	1.29	0.22	0.22	1.91	0.21	2.26	0.47	0.24	0.15	1.23	0.00	0.00	= 8.2
Percentage	18.4%	22.3%	1.3%	12.7%	1.4%	28.3%	3.9%	1.4%	2.1%	8.2%	0.0%	0.0%	
Surface Plane/Texture Score ²	X	X	X	X	X	X	X	X	X	X	X	X	
Texture:	8	5	5	7	8	7	7	5	8	6			
>7 planes	1.47	1.12	0.07	0.89	0.11	1.98	0.27	0.07	0.17	0.49	0.00	0.00	= 6.6
Percent of Perimeter Visible: 43% 259' of 596'													Perimeter Score ³ = 6
													CONTRAST RATING = 21

CONTRAST RATING SHEET

Walkway

	Concrete					Total Lakefront Façade
Area SF	645.0	+		+		645
Percentage	100.0%		0.0%		0.0%	
	x		x		x	
Color and Reflectance Rating ¹	17					
Munsell Color for surface and Reflectance for glass	Gley1 6/10GY					
	17.00	+	0.00	+	0.00	17.0
Percentage	100.0%		0.0%		0.0%	
	x		x		x	
Surface Plane/Texture Score ²	4	+		+		
Texture Heavy						
# of Planes: 1	4.00	+	0.00	+	0.00	4.0
Percent of Perimeter Visible:	100%					1
488' of 488'						22

COMPOSITE CONTRAST RATING

	Oblique	Walkway					Total Lakefront Façade
Area SF	5954	645	+		+		6599
Percentage	90%	10%		0%		0%	
	x	x		x		x	
CONTRAST RATING	21	22					
	18.9	2.2	+	0.0	+	0.0	21.1
COMPOSITE CONTRAST RATING							21

LAKEFRONT FAÇADE: EXISTING
SCREENED AREA: 6599
VISIBLE AREA: 1591
5008

VISIBLE S.F. ALLOWED 680
L.F. of Shoreline > 100' 3,418
Possible Allowed Vis. S.F. 18112

Wood Curb	= 55.9 Sq.Ft.	8.67%
Wood Retaining wall	= 49.1 Sq.Ft.	7.62%
concrete street	= 539.7 Sq.Ft.	83.71%

Design Workshop, Inc.
Landscape Architecture
Land Planning
Urban Design
Strategic Services

Memorandum

To: Edgewood Team
From: Richard Shaw
Date: 12/19/2011
Project Name: Edgewood Lodge
Project #: 3977
Subject: Edgewood Lodge & Golf Visual
Magnitude Study

The included documents support the Edgewood Lodge project and the ongoing environmental review. The following is provided with regard to the Visual Magnitude Rating.

The methodology used is defined by the TRPA's "Baseline Scenic Conditions Assessment for Shoreland and Shorezone Projects." Additionally "Appendix G: Approved TRPA range of earthtone colors" was used. These documents reinforce the method to establish and assess the project proposal with consideration of the visual review.

The following process was completed:

1. The previous baseline scenic conditions for the project area were determined by completing an evaluation for the two existing single family houses, and combining the resulting findings with the TRPA approved baseline evaluation for the existing clubhouse and walkway, completed and approved by TRPA on 7/11/2007. (see adjoining document "111219 – VMS – Existing Conditions")
2. Elevations of the proposed structures and associated screening vegetation within the shoreland were created.
3. The elevations were then used to quantify the amount of the different materials visible from the lake, as well as to determine the percentage of visible perimeter.
4. Corresponding Munsell colors, and their color and reflectance ratings, were selected for each of the materials based upon actual material samples.
5. Texture ratings were determined through evaluation of both the proposed material and its proposed use within the project.
6. Material quantities, Munsell colors, color & reflectance ratings, and texture scores were then inserted into the TRPA contrast rating sheet thus rendering contrast ratings for each proposed structure:
 - a. Clubhouse Expansion = 21
 - b. Proposed Pier = 23
 - c. Pool Deck = 19
 - d. Pedestrian Bridge = 21
 - e. Creek Outlet = 16

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7. A composite contrast rating of 20 was then determined by determining the percentage of overall visible area attributed to each structure, multiplying the resulting percentages by the respective contrast ratings, and then totaling the resulting figures.
8. A linear foot of the shoreline was determined by measuring the length of the parcel boundary along the lake front. A longer shoreline than the baseline was determined due to the addition of new lake frontage acquired through the proposed removal of two existing home sites, located within the project area.
9. A “possible allowed visible square footage” of 16,705 was then determined using the formulas established within the TRPA Contrast Rating spreadsheet

By going through the above process, it was determined that the total proposed visible square footage of 6,459 (after vegetative screening) falls well within allowable parameters.

Notes:

- All baseline information for the clubhouse and walkway comes directly from the baseline study approved in 2007. Additions to that approved assessment include only baseline assessment for existing home lots and proposed activity associated with the new project.
- The elevations for all improvement in the shoreland and shorezone were developed and measured using AutoCAD.

CONTRAST RATING SHEET

Clubhouse

	Rock Wall	Glazing	Copper	Wood Fascia	Wood Handrail	Slate Roof	Exposed Beams	Metal Handrail	Mechanical	Concrete Stairs	Window Trim	Chimney	Wood Wall	Exposed Wood	Total Lakefront Façade
Area SF	1756.4	1812.1	61.0	642.3	134.8	2290.7	187.4	4.9	48.4	45.7	558.0	35.5	231.0	289.3	= 8097.5
Percentage	21.7%	22.4%	0.8%	7.9%	1.7%	28.3%	2.3%	0.06%	0.6%	0.6%	6.9%	0.4%	2.9%	3.6%	
Color and Reflectance Rating¹ Munsell Color for surface and Reflectance for glass	x	x	x	x	x	x	x	x	x	x	x	x	x	x	
	7	1	17	15	15	8	12	17	17	7	15	7	15	15	
	5Y 6/1	>15%	Gley1 2.5/1	7.5YR 4/6	7.5YR 4/6	10R 4/2	7.5YR 5/6	Gley1 2.5/5B	Gley1 2.5/5B	5Y 6/1	7.5YR 4/6	5Y 6/1	7.5YR 4/6	7.5YR 4/6	
	1.5	0.2	0.1	1.2	0.3	2.3	0.3	0.0	0.1	0.0	1.0	0.0	0.4	0.5	= 7.9
															+
Percentage	21.7%	22.4%	0.8%	7.9%	1.7%	28.3%	2.3%	0.1%	0.6%	0.6%	6.9%	0.4%	2.9%	3.6%	
Surface Plane/ Texture Score²	x	x	x	x	x	x	x	x	x	x	x	x	x	x	
	8	5	5	7	8	7	7	5	5	7	6	8	7	7	
Texture:	Heavy	None	None	Moderate	Heavy	Moderate	Moderate	None	None	Moderate	Minimal	Heavy	Moderate	Moderate	
# of Planes: 30	1.7	1.1	0.0	0.6	0.1	2.0	0.2	0.0	0.0	0.0	0.4	0.0	0.2	0.3	= 6.6
															+
															Percent of Perimeter Visible: 43%
															303' of 701'
															Perimeter Score³ = 6
															CONTRAST RATING = 21

Proposed Pier

Percentage	84.8%	15.2%	0.0%	0.0%	0.0%	0.0%	0.0%
-------------------	-------	-------	------	------	------	------	------

$$\begin{array}{ccccccc} \text{7.5YR 4/6} & & \text{7.5YR 3/1} & & & & \\ \text{II} & & \text{II} & & \text{II} & & \text{II} \\ \boxed{12.7} & + & \boxed{2.6} & + & \boxed{0.0} & + & \boxed{0.0} & + & \boxed{0.0} & + & \boxed{0.0} & + & \boxed{0.0} & = & \boxed{15.3} \end{array}$$

85%	15%	0%	0%	0%	0%	0%
-----	-----	----	----	----	----	----

=

+

$$\text{Perimeter Score}^3 = 1$$

CONTRAST RATING	23
------------------------	----

CONTRAST RATING SHEET

Pool Terrace

	Rock Wall	Glazing	Slate Roof	Metel Handrail	Concrete Stairs	Wood Wall	Exposed Wood	Exposed Metal	Pool Tile	Total Lakefront Façade									
Area SF	1206.4	+	1415.1	+	310.4	+	1.4	+	53.5	+	52.7	+	19.2	+	33.2	+	14.0	=	3105.9
Percentage	38.8%		45.6%		10.0%		0.0%		1.7%		1.7%		0.6%		1.1%		0.5%		
Color and Reflectance Rating¹ Munsell Color for surface and Reflectance for glass	x	x	x	x	x	x	x	x	x	x									
	7		1		15		17		7		15		15		15		15		
	5Y 6/1	>15%	Gley2 3/5PB	Gley2 2.5/5B	5Y 6/1	7.5YR 4/4	7.5YR 3/4	7.5YR 3/1	Gley1 3/N										
	2.7	+	0.5	+	1.5	+	0.0	+	0.1	+	0.3	+	0.1	+	0.2	+	0.1	=	5.5
Percentage	39%		46%		10%		0%		2%		2%		1%		1%		1%		
Surface Plane/Texture Score² Texture	x	x	x	x	x	x	x	x	x	x									
	8	+	5	+	7	+	5	+	7	+	7	+	7	+	5	+	5		+
# of Planes: 10	Heavy		None		Moderate		None		Moderate		Moderate		Moderate		None		None		
	3.1	+	2.3	+	0.7	+	0.0	+	0.1	+	0.1	+	0.1	+	0.1	+	0.1	=	6.6
																			+
																			7
																			19

Percent of Perimeter Visible: 40%
306' of 757'

Perimeter Score³ = 7

CONTRAST RATING = 19

CONTRAST RATING	21
------------------------	----

Creek Outlet

Percentage	100%	0%	0%	0%	0%	0%	0%
-------------------	------	----	----	----	----	----	----

Rating¹

7						

$$\begin{array}{|c|} \hline 7.0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0.0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0.0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0.0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0.0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0.0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0.0 \\ \hline \end{array} = \begin{array}{|c|} \hline 7.0 \\ \hline \end{array}$$

100%	0%	0%	0%	0%	0%	0%
------	----	----	----	----	----	----

$$\boxed{8} + \boxed{} + \boxed{} + \boxed{} + \boxed{} + \boxed{} + \boxed{}$$

Heavy

$$\begin{array}{|c|} \hline 8 \\ \hline \end{array} + \begin{array}{|c|} \hline 0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0 \\ \hline \end{array} + \begin{array}{|c|} \hline 0 \\ \hline \end{array} = \begin{array}{|c|} \hline 8.0 \\ \hline \end{array}$$
Perimeter Score³

11

16

COMPOSITE CONTRAST RATING

	Clubhouse	Proposed Pier	Pool Terrace	Pedestrian Bridge	Creek Outlet				Total Lakefront Façade
Area SF	8098	157	3106	57	39	0	0	0	11457
Percentage	71%	1%	27%	0%	0%	0%	0%	0%	
	x	x	x	x	x	x	x	x	
CONTRAST RATING	21	23	19	21	16	0	0	0	
	14.9	0.2	5.1	0.0	0.0	0.0	0.0	0.0	20.2
									20
COMPOSITE CONTRAST RATING									

LAKEFRONT FAÇADE: 11,457
SCREENED AREA: 4,804
VISIBLE AREA: 6,653

VISIBLE S.F. ALLOWED	595
L.F. of Shoreline > 100'	3610
Possible Allowed Vis. S.F.	16705

EDGEWOOD CLUBHOUSE EXPANSION SCENIC ASSESSMENT

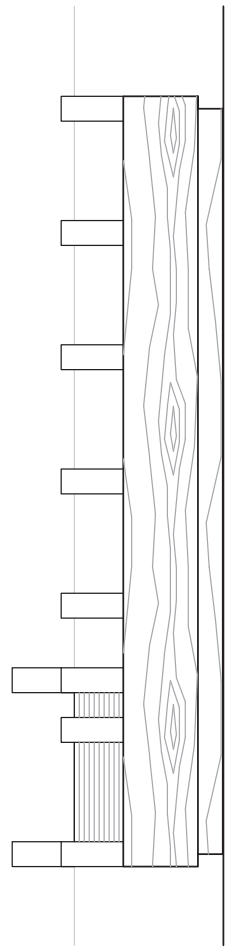
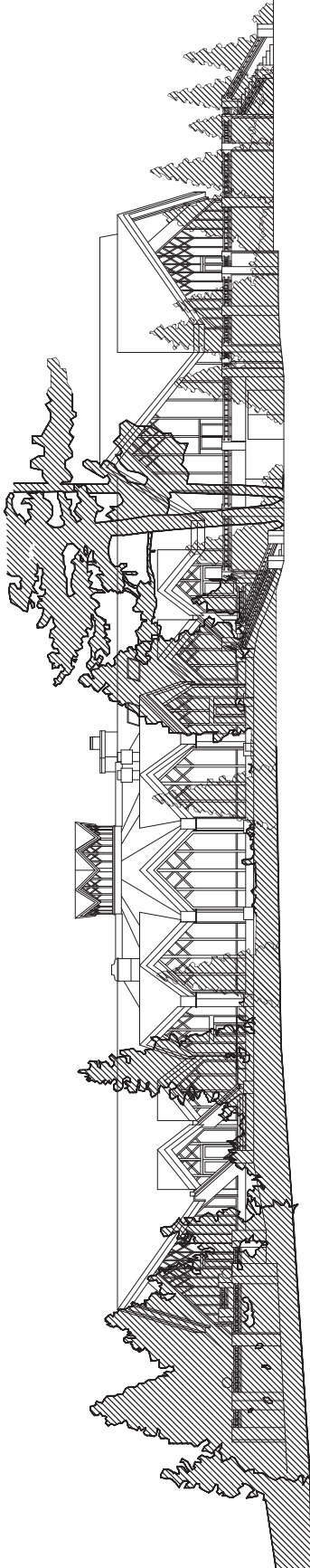
Total Visible Lake View Elevation = 4665.6 sf

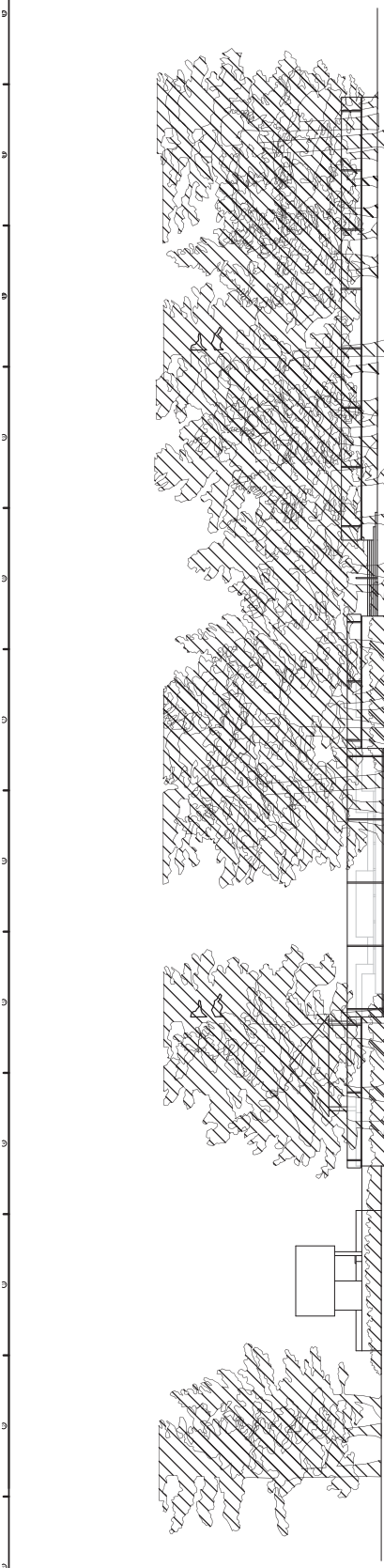
Roof	= 2,290.7 sf	28.3%
Stairs	= 45.7 sf	0.6%
Wall	= 231.0 sf	2.9%
Mechanical	= 48.4 sf	0.1%
Chimney	= 35.5 sf	0.4%
Exposed Wood	= 289.3 sf	3.6%
Exposed Beams	= 187.4 sf	2.3%
Fascia	= 642.3 sf	7.9%
Metal Handrails	= 4.9 sf	0.1%
Wood handrails	= 134.8 sf	1.7%
Rock	= 1,756.4 sf	21.7%
Glazing	= 1,812.1 sf	22.4%
Window Trim	= 558.0 sf	6.9%
Copper	= 61.0 sf	0.8%

PROPOSED PIER SCENIC ASSESSMENT

Total Visible Lake View Elevation = 156.8 sf

Exposed Wood	= 132.9 sf	84.8%
Exposed Metal	= 23.9 sf	15.2%





EDGEWOOD LODGE POOL DECK SCENIC ASSESSMENT

Total Visible Lake View Elevation = 1539.5 sf

Roof	= 310.4 sf	10.0%
Stairs	= 53.5 sf	1.7%
Wall	= 52.7 sf	1.7%
Exposed Wood	= 19.2 sf	0.6%
Metal Handrails	= 1.4 sf	0.1%
Rock	= 1,206.4 sf	38.8%
Glazing	= 1,415.1 sf	45.6%

PEDESTRIAN BRIDGE SCENIC ASSESSMENT

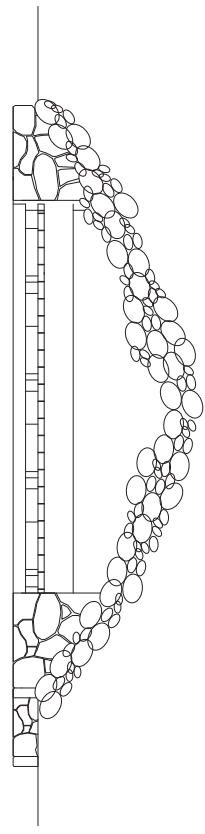
Total Visible Lake View Elevation = 56.5 sf

Exposed Wood	= 36.4 sf	64.4%
Rock	= 20.1 sf	35.6%

CREEK OUTLET SCENIC ASSESSMENT

Total Visible Lake View Elevation = 38.7 sf

Loose Rock	= 38.7 sf	100%
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Visual Simulation Methodology Memorandum

Memorandum

Design Workshop, Inc.
Landscape Architecture
Land Planning
Urban Design
Strategic Services

To: Edgewood Team
From: Richard Shaw
Date: September 15, 2011
Project Name: Edgewood Resort
Project #: 3977
Subject: Visual Simulation Methods

At the request of the team preparing the Edgewood Lodge environmental document, the following description outlines the method used for the preparation of the Edgewood Lodge project visual simulations:

Step One: Viewpoint Determination

The visual simulations were anticipated to be part of the project and environment review. The viewpoints were established through meetings with TRPA staff where the type and location of the simulations were determined. The viewpoints identified include the shore zone viewing location and travel route viewpoints. These specific points were also determined with the TRPA staff and are located on the base maps. In total, there are four viewpoints included.

Step Two: Creation of the Existing Conditions Photography

Photographs from the viewpoints determined for the simulations occurred on May 13, 2009. These photographs were taken on the same day under similar light conditions. The digital photography was recorded and tracked with the viewpoint locations.

Step Three: Development of a Three Dimensional Model of the Options Proposed

The proposed features of the project options were constructed in a 3-D computer program called SketchUp. This wire frame and shaded computer model used the project data to establish the height, position, and the mass of improvements. Known horizontal and vertical measurements were used as a reference to overlay the digital computer model and photographs. The physical features seen from the viewpoints were verified within the photos and SketchUp overlay. The primary visual screen between the lake viewpoint and the lodge are existing trees which were surveyed with spot elevations. Trees to be removed were determined and compared to the photographs. The proposed features seen include: bridges, pier, buildings, contour grading, retaining walls, golf holes, wind screen, pump house, and other features. Figure 1 shows the overlay of the computer model and photography taken from the viewpoint of Lake Tahoe.

Step Four: Development of the Surface Finishes, Texture, Materials, and Light Characteristics

These proposed features and landscape were developed with photo references for their color, texture, materials, and reflectivity. Using the Photoshop program, these features were rendered to create realistic materials and textures. A factor for distance was used in photo references to scale the textures to the

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viewing distance. The Edgewood Clubhouse expansion used photo textures to simulate the matching materials to the existing building. The new buildings used color and material proposed including wood timber, stone, railing, walls and other exterior materials. The final images were printed and labeled to demonstrate the visual change and visibility of the proposed project options.

The lodge options are all located greater than 300 feet from the lake edge and therefore are located outside the shore zone viewpoint. Surface deck areas and other recreational uses that are apparent are simulated in the shore line unit as well as the addition to the Edgewood Clubhouse.

The travel route visual simulations are from a distance and screened by dense forests. The SketchUp model shows no visibility from these travel route viewpoints.

Step Five: Verification of the 'Seen' Areas and Screening in Front of the Proposed Structures

The trees that are in the viewpoint photograph were verified to exist and are to be retained on the site and include overlaying of the utilities plans and grading plan. This was documented graphically on Figure 2. These were located on the plan between the lake edge and the proposed option evaluated. The tree locations were modeled to locate the screening areas and correlate with the photo viewpoints. This was then used to check the 'seen' areas in the viewpoints and determine the portions of the new development that would be visible given the existing vegetation. This is Figure 3. The screening features for all viewpoints were verified.

Step Six: Submission of the Visual Simulations for the Environmental Review

The viewpoint simulations were printed with an inkjet printer and submitted by the project applicant.

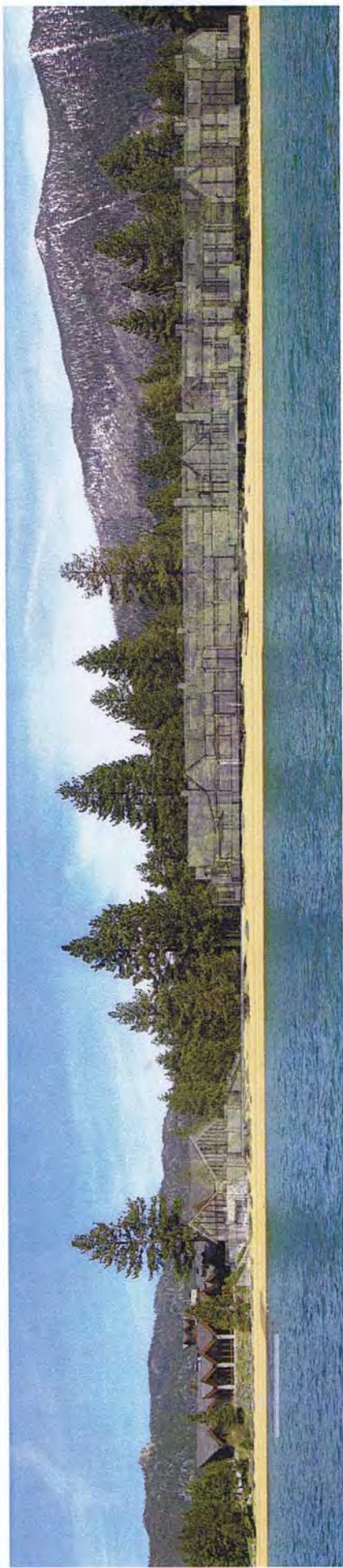


FIGURE 1. Overlay of computer model onto viewpoint photograph



FIGURE 2. Graphic documentation of trees located in the 'seen' areas in the viewpoint photograph

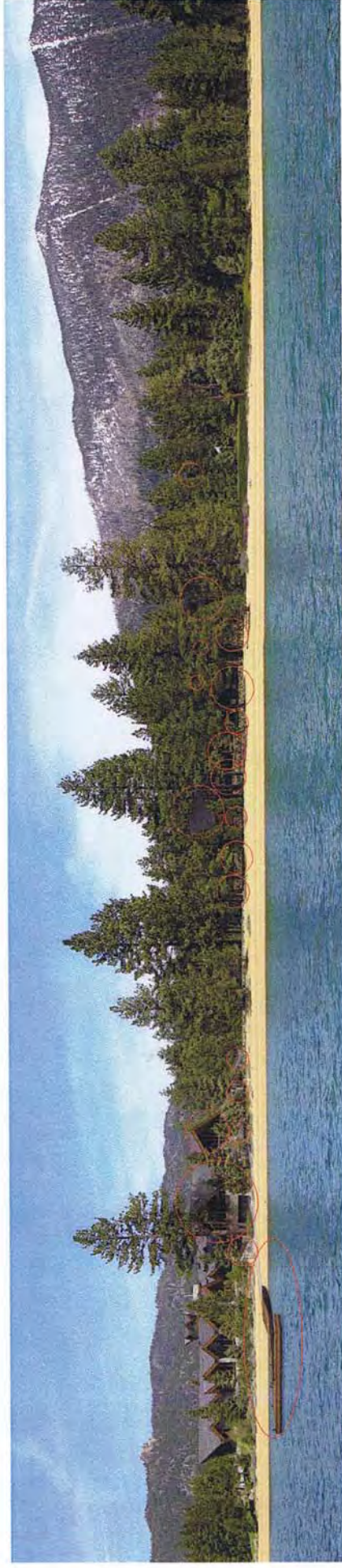


FIGURE 3. Visible portions of the new development given the existing vegetation

Lighting Plan and Details

EDGEWOOD ARCHITECTURAL LIGHTING FIXTURE CONCEPT CUT SHEETS

EXTERIOR LIGHTING - SYMBOL LEGEND

PG 2	○ _a	CEILING MOUNT - SURFACE - SIMPLE FIXTURE ANTARES COMPASS BOX SURFACE MOUNTED LAMP
PG 3	○ _b	CEILING MOUNT - SURFACE - DECORATIVE FIXTURE HESSAMERICA MESSINA 80 RM
PG 4	● _a	CEILING MOUNT - RECESSED - SIMPLE FIXTURE ANTARES COMPASS BOX RECESSED
PG 5	● _b	CEILING MOUNT - RECESSED - DECORATIVE FIXTURE KREON PROLOGE 80 IN-DOLMA SINGLE
PG 6-8	◇ _{1a}	WALL MOUNT - SURFACE - DOWN - SIMPLE FIXTURE LUMIERE WESTWOOD 904 - LED
PG 6-8	◇ _{1b}	WALL MOUNT - SURFACE - UP/DOWN - SIMPLE FIXTURE LUMIERE WESTWOOD 904 - LED
PG 9-10	◇ _{2a}	WALL MOUNT - SURFACE - *UP - SIMPLE FIXTURE LUMIERE CAMBRIA 203 - LED
PG 11	◇ _{2b}	WALL MOUNT - SURFACE - *UP - DECORATIVE FIXTURE HESSAMERICA- RESIDENZA
PG 12	◆ ₁	WALL MOUNT - RECESSED - DOWN MODULAR H2A LED MODUL- MOUNTED AS SHOWN IN PHOTO, UNDER LEDGE
PG 12	◆ ₂	WALL MOUNT - RECESSED - *UP MODULAR H2A LED MODUL- MOUNTED RECESSED INTO COLUMN OR ROOF OVERHANG POINTED UP AT CEILING

*NOTE: ALL UP LIGHTS ARE LOCATED BELOW FLAT ROOFS
AND OVERHANGS

O_a CEILING MOUNT - SURFACE - SIMPLE FIXTURE



» Zoom-View

Antares Compass Box surface mounted lamp

Design: ANTARES

Presented: Light+Building 2008, Frankfurt

stylepark-id: 04.2104.11086

categories: lighting » decorative light » surface mounted lights »
ceiling mounted lights

» Catalogue and price request to manufacturer

Bookmark at:

01 product description

manufacturer: Antares, Germany

Product description

The already rich Compass series by Flos Architectural is completed by a new line of no trim fixed models which -due to their structure, allow a perfect integration with different architectural elements - and with new external ceiling versions.

The new line includes solutions with one, two or four adjustable lamps for a diffused or direct light. There are also new types of light sources such as compact energy-saving fluorescent lamps and dichroic lamps, which adapt perfectly to the needs of the internal lighting market.

The new "Compass Box" have extruded aluminium bodies and a simple fixing system. There are seven available finishes for the "surface" version, all with integrated electronic devices. With Compass Box, Flos Architectural produces "light" and not simply lighting systems.

recom. price

» Available on request from the manufacturer

design: ANTARES
2008

02 technical data

Fittings	
Fittings	QR-CBC 51, 35W max (halogen) QT-12, 100W max. (halogen) QR-111, 100W max (halogen) CDM-R111, 35/70W (discharge) T5 FQ, 24/54W (linear fluorescent) TC-L, 40W max (compact fluorescent)
Illuminant, means of lighting	
Bulb type	compact fluorescent lamp, halogen reflector lamp high volt, low voltage halogen reflector light bulb
Power connection reading	
Max. output	24 W, 35 W, 40 W, 51 W, 54 W, 70 W, 100 W

» Last products view

03 security/protection

Security/protection	
Form of protection (DIN 40050)	IP20 protection against: solids > 12 mm

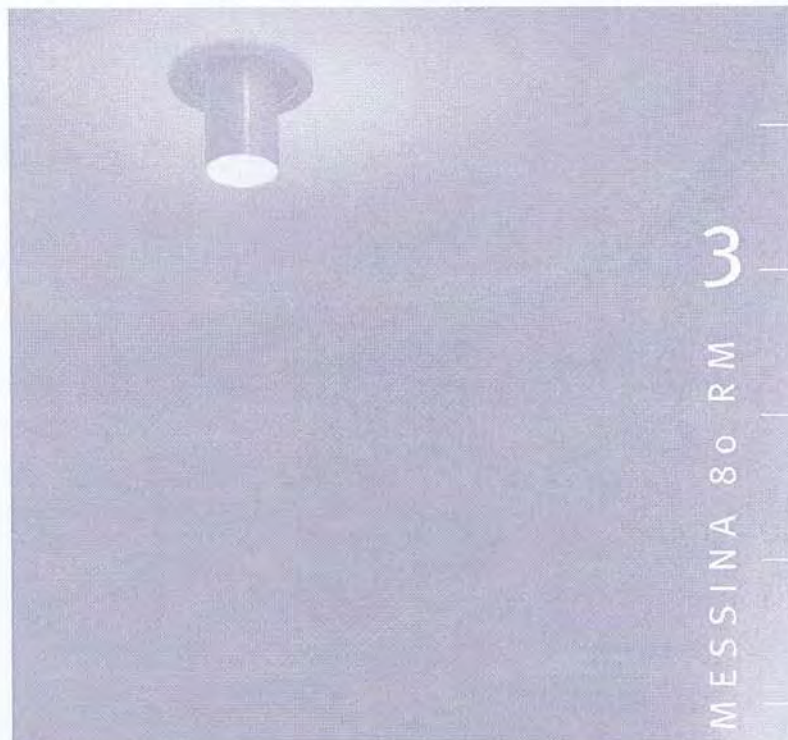
04 All Compass Products



05 Tags

lightings, illuminations, brillances, ceiling lights, ceiling luminaires, light sources, to shine, surface mounted ceiling lights, ornamental lights, interior lightings, lights, lamps, decorative lights, luminescences, surface mounted, ceiling surface mounted lights, surface mounted luminaires, illuminating, surface mounted ceiling luminaires, ceiling surface mounted luminaires, surface mounted lights, rediances, surface mounted devices, ornamentally lights

CEILING MOUNT - SURFACE - DECORATIVE FIXTURE



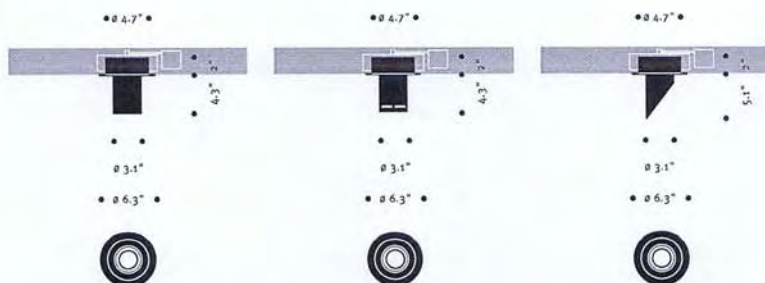
MESSINA 80 RM
Ceiling Mounted Luminaire

The MESSINA family adds simple elegance to any space providing either accent or ambient lighting. Housing is machined from billet aluminum, then satin anodized. The spun aluminum semi-recessed

trim and decorative aluminum cylinders are also anodized. Cylinders are available in three styles. Hardware is stainless steel. See technical data sheet for details.

 Listed for Damp Locations

Model	Mounting	Lamp
MS80RM	Ceiling	50 Halogen / 50 LVH / 35 LVH
MS80RMS	Ceiling	50 Halogen / 50 LVH / 35 LVH
MS80RMA	Ceiling	50 Halogen / 50 LVH / 35 LVH



● a CEILING MOUNT - RECESSED - SIMPLE FIXTURE



› Zoom-View

Antares Compass Box recessed

Design: ANTARES

Presented: Light+Building 2008, Frankfurt

stylepark-id: 04.2104.11085

categories: lighting › decorative light › built-in lights › ceiling built-in lights

› Catalogue and price request to manufacturer

Bookmark at:

01 product description

manufacturer: Antares, Germany

Product description

The already rich Compass series by Flos Architectural is completed by a new line of no trim fixed models which - due to their structure, allow a perfect integration with different architectural elements - and with new external ceiling versions. The new line includes solutions with one, two or four adjustable lamps for a diffused or direct light. There are also new types of light sources such as compact energy-saving fluorescent lamps and dichroic lamps, which adapt perfectly to the needs of the internal lighting market. The new "Compass Box" have extruded aluminium bodies and a simple fixing system. There are seven available finishes for the "surface" version, all with integrated electronic devices. With Compass Box, Flos Architectural produces "light" and not simply lighting systems.

recom. price

› Available on request from the manufacturer

design: ANTARES
2008

02 technical data

Fittings	
Fittings	QR-CBC 51, 35W max (halogen) QT-12, 100W max. (halogen) QR-111, 100W max (halogen) CDM-R111, 35/70W (discharge) T5 FQ, 24/54W (linear fluorescent) TC-L, 40W max (compact fluorescent)
Illuminant, means of lighting	
Bulb type	compact fluorescent lamp, halogen reflector lamp high volt, low voltage halogen reflector light bulb
Power connection reading	
Max. output	24 W, 35 W, 40 W, 51 W, 54 W, 70 W, 100 W

› Last products view

03 security/protection

Security/protection	
Form of protection (DIN 40050)	IP20 protection against: solids > 12 mm

04 All Compass Products

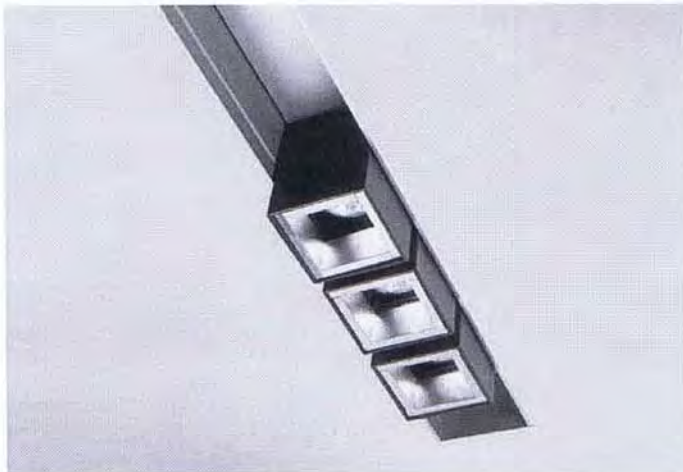


05 Tags

ceiling recessed luminaires, lightings, illuminations, ceiling lights, brillances, ceiling luminaires, recessed lights, light sources, to shine, ornamental lights, interior lightings, lights, lamps, decorative lights, luminescences, ceiling recessed lights, illuminating, recessed luminaires, ornamentally lights, rediances

› Catalogue and price request to manufacturer

●_b CEILING MOUNT - RECESSED - DECORATIVE FIXTURE



Kreon Prologe 80 in-Dolma Single

stylepark-id: 04.1600.10205

categories: lighting › technical light › built-in lights › ceiling built-in lights

› Catalogue and price request to manufacturer

› Download PDF Files

Bookmark at:

01 product description

manufacturer: Kreon, Belgium

Product description

Prologe luminaires protrude slightly from the recessed anodised aluminium housing whereby walls or ceilings can be turned into flexible and functional landscapes, an architectural playground for light.

recom. price

› Available on request from the manufacturer

02 dimensions/weight

› Last products view

overall dimension	
Width	75 mm
Depth	75 mm
Height	100 mm
Installation dimension	
Installation width	105 mm
Installation depth	95 mm
Installation height	190 mm

03 technical data

Fittings	
Fittings	1x HIT/ QR-CB 51/ Q-PAR16 50 W 1x HIT-TC 20 W
Illuminant, means of lighting	
Bulb type	high pressure metal halogen lamp, low voltage halogen reflector light bulb, halogen lamp
Housing	G8.5, GU5.3, GZ10, GU10
Power connection reading	
Voltage	230V, 230V/12V
Max. output	20 W, 50 W

04 security/protection

Security/protection	
Form of protection (DIN 40050)	IP20 protection against: solids > 12 mm
Safety class	class I (protective earthing)

05 All Prologe Products

1a WALL MOUNT - SURFACE - DOWN - SIMPLE FIXTURE

LUMIÈRE®

DESCRIPTION

Westwood 904 and 904-2 are ultra-compact LED and MR16 low voltage halogen fixtures. Model 904 provides downlight or uplight and is available with both LED and halogen sources. Model 904-2 provides a combination uplight and downlight and is available for halogen sources only. Both models mount directly to any wall surface or over a standard 4" J-box and require a remote 12V step-down transformer (not included). Various lenses, louvers and color or dichroic filters can be combined - up to three at once - to create multiple lighting effects. Lumière's exclusive Siphon Protection System (S.P.S.) prevents water from siphoning into the fixture through its own lead wires.

SPECIFICATION FEATURES

A ... Material

Housing and hood are precision-machined from corrosion-resistant 6061-T6 aluminum billet, brass, bronze or stainless steel. Mounting canopy is constructed from corrosion-resistant silicone aluminum, brass, bronze or stainless steel.

B ... Finish Painted

Fixtures constructed from 6061-T6 aluminum are double protected by a chromate conversion undercoating and polyester powdercoat paint finish, surpassing the rigorous demands of the outdoor environment. A variety of standard colors are available. Brass, Bronze or Stainless Steel Fixtures constructed from brass, bronze or stainless steel are left unpainted to reveal the natural beauty of the material. Brass and bronze will patina naturally over time.

C ... Hood

Hood is removable for easy relamping and accepts up to three internal accessories at once (lenses, louvers, filters) to achieve multiple lighting effects. Weep holes prevent water collection on the uplight position.

D ... Gasket

Housing and hood are sealed with a high temperature silicone o-ring gasket to prevent water intrusion.

E ... Lens

Tempered glass lens, factory sealed with high temperature adhesive to prevent water intrusion and breakage due to thermal shock.

F ... Mounting

Both models mount directly to wall surface or over a standard 4" J-box and require remote 12V step-down transformer (not included). Model 904 provides downlight or uplight. Model 904-2 provides non-adjustable uplight and downlight. Lumière's exclusive Siphon Protection System (S.P.S.) prevents water from siphoning into the fixture through its own lead wires.

G ... Hardware

Stainless steel hardware is standard to provide maximum corrosion-resistance.

H ... Socket

Ceramic socket with 250° C Teflon® coated lead wires and GU5.3 bi-pin base.

I ... Electrical

Remote 12V transformer required (not included). Available from Lumière as an accessory - see the Accessories & Technical Data section of this catalog for details.

J ... Lamp

Halogen lamp not included. Available from Lumière as an accessory - see reverse side for details and catalog logic. Due to the onboard thermal feedback control circuitry, LED modules are non-dimmable. LED modules are included and are available in three color temperatures (warm, neutral and cool) and three distributions (spot, narrow and flood). Both color temperature and distribution must be specified when ordering - see reverse side for details and catalog logic.

K ... Labels & Approvals

UL and cUL listed, standard wet label. IP65 rated. Manufactured to ISO 9001-2000 Quality Systems Standard. IBEW union made.

L ... Warranty

Lumière warrants its fixtures against defects in materials & workmanship for three (3) years. Auxiliary equipment such as transformers, ballasts and lamps carry the original manufacturer's warranty.

Catalog #	Type
Project	
Comments	Date
Prepared by	



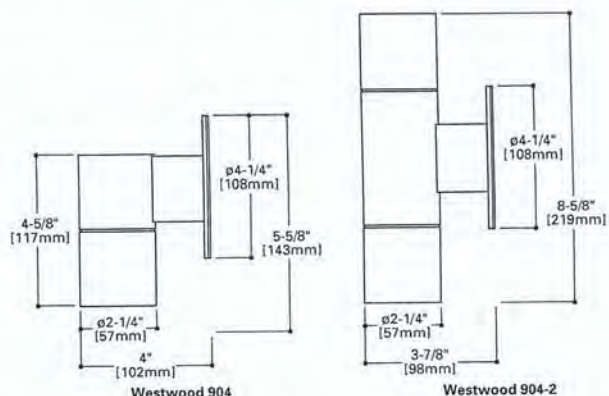
WESTWOOD

**904
904-2**

**12W LED
50W (max.) MR16**
LED
Halogen
Low Voltage

Wall

IP65



1a WALL MOUNT - SURFACE - DOWN - SIMPLE FIXTURE

WESTWOOD 904 / 904-2

LAMP INFORMATION

Lamp	ANSI Code	Watts	Beam Spread	CBC	°K	Life (hrs.)	Base	Volts
2WLEDS		12	8°	443	3000	50000	GU5.3 bi-pin	12
12NLEDS		12	8°	487	4300	50000	GU5.3 bi-pin	12
12CLEDS		12	8°	576	3000	50000	GU5.3 bi-pin	12
12WLEDN		12	16°	443	4300	50000	GU5.3 bi-pin	12
12CLEDN		12	16°	487	6300	50000	GU5.3 bi-pin	12
12WLEDW		12	30°	443	3000	50000	GU5.3 bi-pin	12
12NLEDW		12	30°	487	4300	50000	GU5.3 bi-pin	12
12CLEDW		12	30°	576	6300	50000	GU5.3 bi-pin	12
50MR16/NSP	EXT	50	12°	11,000	3050	4000	GU5.3 bi-pin	12
50MR16/NFL	EXZ	50	25°	3200	3050	4000	GU5.3 bi-pin	12
50MR16/FL	EXN	50	40°	2000	3050	4000	GU5.3 bi-pin	12
50MR16/WFL	FNV	50	60°	1200	3050	4000	GU5.3 bi-pin	12

NOTE: Inferior quality lamps may adversely affect the performance of this product. Use only name brand lamps from reputable lamp manufacturers.

ORDERING INFORMATION

Sample Number: 904-2-50MR16-12-NCP

Series 904 =MR16 Up/Down Westwood Wall Fixture	Source <u>Halogen</u> 50MR16 =50W Max Halogen MR16, GU5.3 Base <u>LED</u> 12WLEDS = 12W Warm LED Spot Optic, GU5.3 Base 12NLEDS = 12W Neutral LED Spot Optic, GU5.3 Base 12CLEDS = 12W Cool LED Spot Optic, GU5.3 Base 12WLEDN = 12W Warm LED Narrow Optic, GU5.3 Base 12NLEDN = 12W Neutral LED Narrow Optic, GU5.3 Base 12CLEDN = 12W Cool LED Narrow Optic, GU5.3 Base 12WLEDW = 12W Warm LED Wide Optic, GU5.3 Base 12NLEDW = 12W Neutral LED Wide Optic, GU5.3 Base 12CLEDW = 12W Cool LED Wide Optic, GU5.3 Base	Voltage 12 =12V Finish <u>Painted</u> BK=Black BZ=Bronze CS=City Silver VE=Verde WT=White <u>Metal</u> NBR=Brass NCP=Copper NSS=Stainless Steel	Accessories Filters F71 =Peach Dichroic Filter, 2.00" Dia F73 =Green Dichroic Filter, 2.00" Dia F75 =Yellow Dichroic Filter, 2.00" Dia F77 =Dark Blue Dichroic Filter, 2.00" Dia F79 =Neutral Density Dichroic Filter, 2.00" Dia F22 =Red Color Filter, 2.00" Dia F44 =Green Color Filter, 2.00" Dia Optical Lenses LSL=Linear Spread Lens (elongate standard beam spread), 2.00" Dia DIF=Diffused Lens (provide even illumination), 2.00" Dia Optical Louver LVR=Hex Cell Louver (reduce glare), 2.00" Dia Lamps EZX =20W MR16 GU5.3 Bi-Pin Very Narrow Spot BAB =20W MR16 GU5.3 Bi-Pin Flood FRA =35W MR16 GU5.3 Bi-Pin Spot EXT =50W MR16 GU5.3 Bi-Pin Narrow Spot EXN =50W MR16 GU5.3 Bi-Pin Flood F66 =Mercury Vapor Color Filter, 2.00" Dia F72 =Amber Dichroic Filter, 2.00" Dia F74 =Medium Blue Dichroic Filter, 2.00" Dia F76 =Red Dichroic Filter, 2.00" Dia F78 =Light Blue Dichroic Filter, 2.00" Dia F80 =Magenta Dichroic Filter, 2.00" Dia F33 =Blue Color Filter, 2.00" Dia F55 =Yellow Color Filter, 2.00" Dia OSL=Overall Spread Lens (increase beam spread), 2.00" Dia ESX =20W MR16 GU5.3 Bi-Pin Narrow Spot FRB =35W MR16 GU5.3 Bi-Pin Narrow Spot FMW =35W MR16 GU5.3 Bi-Pin Flood EXZ =50W MR16 GU5.3 Bi-Pin Narrow Flood FNV =50W MR16 GU5.3 Bi-Pin Very Wide Flood
--	--	--	--

Notes:

- * Lamp not included.
- * 12V remote transformer required - not included.
- * See ACCESSORIES & TECHNICAL DATA section of the Lumière catalog for Low Voltage Cable & Transformers.
- * Contact your Cooper Lighting representative for additional options and finishes.

1a WALL MOUNT - SURFACE - DOWN - SIMPLE FIXTURE

PHOTOMETRIC DATA

Westwood 904/904-2
Lamp=50MR16/NSP
(EXT)
CBCP=11,000

Cone of Light

Distance to Illuminated Plane	Initial Nadir Footcandles	Beam Diameter
15'0"	45	4'0"
10'0"	102	3'0"
8'0"	159	2'0"
6'0"	283	1'6"
4'0"	638	1'0"
2'0"	2550	0'6"

Lamp Wattage Multiplier
20W x 0.32



Westwood 904/904-2
Lamp=50MR16/NFL
(EXZ)
CBCP=3200

Cone of Light

Distance to Illuminated Plane	Initial Nadir Footcandles	Beam Diameter
15'0"	13	10'0"
10'0"	29	6'6"
8'0"	45	5'0"
6'0"	81	4'0"
4'0"	181	2'6"
2'0"	725	1'0"



Westwood 904/904-2
Lamp=50MR16/FL
(EXN)
CBCP=2000

Cone of Light

Distance to Illuminated Plane	Initial Nadir Footcandles	Beam Diameter
15'0"	7	12'0"
10'0"	17	8'0"
8'0"	27	6'6"
6'0"	48	5'0"
4'0"	106	3'0"
2'0"	431	1'6"

Lamp Wattage Multiplier
35W x 0.57
20W x 0.30



Westwood 904/904-2
Lamp=50MR16/WFL
(FNV)
CBCP=1200

Cone of Light

Distance to Illuminated Plane	Initial Nadir Footcandles	Beam Diameter
15'0"	5	17'0"
10'0"	11	11'6"
8'0"	17	9'0"
6'0"	30	7'0"
4'0"	67	4'6"
2'0"	269	2'0"



NOTES AND FORMULAS

- Beam diameter is to 50% of maximum footcandles, rounded to the nearest half-foot.
- Footcandle values are initial. Apply appropriate light loss factors where necessary.
- Bare lamp data shown. Consult lamp manufacturers to obtain detailed specifications for their lamps.

DESCRIPTION

Cambria 203 is an ultra-compact MR16 low voltage halogen and LED fixture. It is available with a fully adjustable side swivel stem (203, 203-FL), an adjustable center rear swivel (203-CRS) or stationary rear flush mount (203-FM). Various lenses, louvers and color or dichroic filters can be combined - up to three at once - to create multiple lighting effects. Lumière's exclusive Siphon Protection System (S.P.S.) prevents water from siphoning into the fixture through its own lead wires.

Catalog #	Type
Project	
Comments	Date
Prepared by	

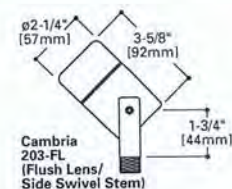
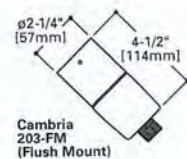
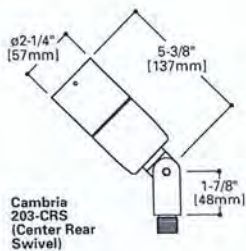
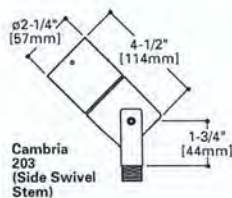
SPECIFICATION FEATURES

A ... Material

Housing, hood and mounting stem are precision-machined from corrosion-resistant 6061-T6 aluminum billet, C360 brass, C932 bronze, C110 copper or 303/304 stainless steel.

B ... Finish Painted

Fixtures constructed from 6061-T6 aluminum are double protected by a chemical film undercoating and polyester powdercoat paint finish, surpassing the rigorous demands of the outdoor environment. A variety of standard colors are available.



C ... Brass, Bronze, Copper or Stainless Steel

Fixtures constructed from brass, bronze, copper or stainless steel are left unpainted to reveal the natural beauty of the material. Brass, bronze and copper will patina naturally over time.

D ... Hood

Hood is removable for easy relamping and accepts up to three internal accessories at once (lenses, louvers, filters) to achieve multiple lighting effects. Model 203, 203-CRS & 203-FM: Weep holes prevent water and mineral stains from collecting on the lens, even in the straight-up position. Model 203-FL: The flush lens design reduces fixture length, minimizes debris collection and prevents water and mineral stains from collecting on the lens.

E ... Gasket

Housing and hood are sealed with a high temperature silicone o-ring gasket to prevent water intrusion.

F ... Lens

Tempered glass lens, factory sealed with high temperature adhesive to prevent water intrusion and breakage due to thermal shock.

G ... Mounting Stem

Model 203 and 203-FL include fully adjustable side-mounted swivel stem, providing 340° tilt and 360° rotation for easy aiming. Center rear swivel (203-CRS) or stationary rear flush mount (203-FM) models are also available. All models include 1/2" NPS threaded male fitting. Stainless steel aim-locking mechanisms are standard (not available on 203-FM). Lumière's exclusive Siphon Protection System (S.P.S.) prevents water from siphoning into the fixture through its own lead wires.

H ... Hardware

Stainless steel hardware is standard to provide maximum corrosion-resistance.

I ... Socket

Ceramic socket with 250° C Teflon® coated lead wires and GU5.3 bi-pin base.

J ... Electrical

Remote 12V transformer required (not included). Available from Lumière as an accessory - see the Accessories & Technical Data section of this catalog for details.

K ... Lamp

Halogen lamp not included. Available from Lumière as an accessory - see reverse side for details and catalog logic. Due to the onboard thermal feedback control circuitry, LED modules are non-dimmable. LED modules are included and are available in three color temperatures (warm, neutral, and cool) and three distributions (spot, narrow, and flood). Both color temperature and distribution must be specified when ordering - see reverse side for details and catalog logic.

L ... Labels & Approvals

UL and cUL listed, standard wet label. IP65 rated. Manufactured to ISO 9001-2000 Quality Systems Standard. IBEW union made. Approved by New York City Dept. of Buildings, Bureau of Electrical Control for use in NYC, NY.

M ... Warranty

Lumière warrants its fixtures against defects in materials & workmanship for three (3) years. Auxiliary equipment such as transformers, ballasts and lamps carry the original manufacturer's warranty.



CAMBRIA 203

12W LED
50W (max.) MR16

LED
Halogen
Low Voltage

Accent/Flood

IP65

PHOTOMETRIC DATA

Cambria 203
Lamp=50MR16/NSP
(EXT)
CBCP=11,000

Cone of Light

Distance to Illuminated Plane	Initial Nadir Footcandles	Beam Diameter
15'0"	45	4'0"
10'0"	102	3'0"
8'0"	159	2'0"
6'0"	283	1'6"
4'0"	638	1'0"
2'0"	2550	0'6"

Lamp Wattage Multiplier
20W x 0.32

Cambria 203
Lamp=50MR16/NFL
(EXZ)
CBCP=3200

Cone of Light

Distance to Illuminated Plane	Initial Nadir Footcandles	Beam Diameter
15'0"	13	10'0"
10'0"	29	6'6"
8'0"	45	5'0"
6'0"	81	4'0"
4'0"	181	2'6"
2'0"	725	1'0"

Cambria 203
Lamp=50MR16/FL
(EXN)
CBCP=2000

Cone of Light

Distance to Illuminated Plane	Initial Nadir Footcandles	Beam Diameter
15'0"	7	12'0"
10'0"	17	8'0"
8'0"	27	6'6"
6'0"	48	5'0"
4'0"	106	3'0"
2'0"	431	1'6"

Lamp Wattage Multiplier
35W x 0.57
20W x 0.30

Cambria 203
Lamp=50MR16/WFL
(FNV)
CBCP=1200

Cone of Light

Distance to Illuminated Plane	Initial Nadir Footcandles	Beam Diameter
15'0"	5	17'0"
10'0"	11	11'6"
8'0"	17	9'0"
6'0"	30	7'0"
4'0"	67	4'6"
2'0"	269	2'0"

NOTES AND FORMULAS

- Beam diameter is to 50% of maximum footcandles, rounded to the nearest half-foot.
- Footcandle values are initial. Apply appropriate light loss factors where necessary.
- Bare lamp/LED data shown. Consult lamp/LED manufacturers to obtain detailed specifications for their lamps/LEDs.

LAMP INFORMATION

Lamp	ANSI Code	Watts	Beam Spread	CBC	°K	Life (hrs.)	Base	Volts
2WLEDs		12	8°	443	3000	50000	GU5.3 bi-pin	12
12NLEDs		12	8°	487	4300	50000	GU5.3 bi-pin	12
12CLEDS		12	8°	576	3000	50000	GU5.3 bi-pin	12
12WLEDN		12	16°	443	4300	50000	GU5.3 bi-pin	12
12CLEDN		12	16°	487	6300	50000	GU5.3 bi-pin	12
12WLEDW		12	30°	443	3000	50000	GU5.3 bi-pin	12
12NLEDW		12	30°	487	4300	50000	GU5.3 bi-pin	12
12CLEDW		12	30°	576	6300	50000	GU5.3 bi-pin	12
50MR16/NSP	EXT	50	12°	11,000	3050	4000	GU5.3 bi-pin	12
50MR16/NFL	EXZ	50	25°	3200	3050	4000	GU5.3 bi-pin	12
50MR16/FL	EXN	50	40°	2000	3050	4000	GU5.3 bi-pin	12
50MR16/WFL	FNV	50	60°	1200	3050	4000	GU5.3 bi-pin	12

NOTE: Inferior quality lamps may adversely affect the performance of this product. Use only name brand lamps from reputable lamp manufacturers.



RESIDENZA
Wall Mounted Luminaire

The simple cylindrical form of RESIDENZA is available in two models for pedestrian scale wall mounting applications. Cast aluminum housing with integral fitter houses electrical components. Choice of optics includes clear acrylic lens with faceted



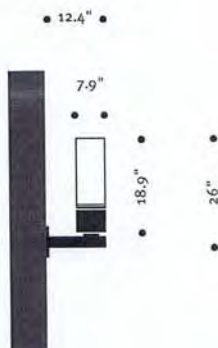
RESIDENZA S
Wall Mounted Luminaire

reflector in symmetric or asymmetric distributions or matte acrylic lens only. Lens twists and locks onto housing for tool-less relamping. Cleanly styled mounting arm is fabricated aluminum. Optional externally mounted decorative house side shield is available on

request. All hardware is stainless steel. Standard colors; matte silver grey metallic or gra-phite grey. Special colors available. See technical sheet for details.

UL Listed for Wet Locations

Model	Lens	Lamp
RS200	Clear	70 MH / 35 MH
RS200S	Matte	70 MH / 35 MH



- 1 WALL MOUNT - RECESSED - DOWN
- 2 WALL MOUNT - RECESSED - *UP



» Zoom-View

Modular H2A LED Modul

stylepark-id: 04.1168.00088

categories: lighting » decorative light » surface mounted lights »
wall mounted lights

Search

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» Catalogue and price request to manufacturer

» where to buy

Bookmark at:

01 product description

manufacturer: Modular, Belgium

Product description

The continuous fluorescence uplight module of the H2A profile has a white symmetric reflector as standard, ensuring uniform light output. Also available is an optional asymmetric light output that makes the light shine onto the target surface at an angle.
The H2A High Power LED module is a unique development conceived as accent lighting and/or additional reading lighting. It is a low-energy, efficient and compact point light source. The LED is built into a lens, so that the light dispersion is beamed in a 15° angle. The 355° horizontal and +/- 55° vertical directionality allows the single or twin lamp LED module to be directed at the optimum reading surface. The LED module is fitted with cold white (6000 Kelvin) or warm white LED's (3200 Kelvin).

Furthermore, a conventional module in 4 colours (amber, red, blue and white) can be used to provide minimal orientation lighting at night. Thanks to the relatively low light output, the conventional LED is used with the H2A profile specifically for indirect and direct orientation lighting.

Modular specifically developed a one-piece polycarbonate extrusion for the H2A up to 6000mm maximum.

This polycarbonate is tougher, easier to install and also guarantees a perfect easy-clean finish. Moreover, the extruded polycarbonate has undergone the glow-wire test (960°) and the material has been catalogued as V0 fire-resistant. The different combinations of polycarbonates with reflectors, wattage and dimming also create a difference in light output and aesthetics.

The H2A base profile comes in anodised aluminium as standard. However, it is possible to powder coat the profile in the characteristic Modular colours (white structure, black structure) or in any other RAL colour desired (gloss or with light-coloured structure). This flexibility allows the H2A to meet the requirement of creating the right mood in the most diverse of interior layouts.

recom. price

» Available on request from the manufacturer

02 technical data

Illuminant, means of lighting	
Bulb type	LED-lamp

03 All H2A Products



04 Tags

illuminations, light sources, to shine, ornamental lights, lamps, lights, decorative lights, surface mounted, surface mounted wall lights, surface mounted luminaires, surface mounted wall luminaires, surface mounted ceiling luminaires, surface mounted lights, surface mounted devices, wall lights, radiances, lightings, wall surface mounted lights, brillances, wall surface mounted luminaires, wall luminaires, interior lightings, luminescences, illuminating, ornamentally lights

» Catalogue and price request to manufacturer

» Collections
» Products
» Philosophy
» www.superm

» Last products viewed



Appendix K

Edgewood Water Company: Source Water Quality Protection Memorandums

July 19, 2012

Via E-mail and U.S. Mail

Theresa Avance, AICP
Senior Planner
TAHOE REGIONAL PLANNING AGENCY
P.O. Box 5310
Stateline, NV 89449

**Edgewood Water Company: Edgewood Lodge and Golf Course Improvement Project,
Draft Environmental Impact Statement (TRPA File ENVP2008 – 0002)
Response to Comments from Tahoe Water Suppliers Association and State of
Nevada, Division of Environmental Protection – Bureau of Safe Drinking Water**

Dear Ms. Avance:

As an introduction, R.O. Anderson Engineering, Inc. is under contract with Edgewood Water Company (Water Company) to assist them with a variety of engineering and land surveying related assignments including the design of the modifications to its existing water treatment plant to upgrade the facilities to meet the requirements of U.S. EPA Long-term 2 Enhanced Surface Water Treatment Rule (LT-2). As you likely know, the Water Company is a Member of the Tahoe Water Suppliers Association (TWSA). In 2007 TWSA, in cooperation with U.S. Army Corps of Engineers, commissioned Black & Veatch to prepare a water quality risk assessment of the public water supplies derived from Lake Tahoe. The Final Report for that risk assessment is entitled *Lake Tahoe Source Water Protection Risk Assessment* and is dated October 2008 (Risk Assessment). At the time the Risk Assessment was prepared only the existing beaches and marinas, as sources of body-contact recreation, were evaluated. For the south shore area of Lake Tahoe, those beaches included Nevada Beach, Lakeside Beach, Pinewild and Round Hill.

The Risk Assessment also included a vulnerability assessment of each of the included intakes (Burnt Cedar, McKinney/Quail and Kingsbury General Improvement District) to sewage and fuel spills and other potential contaminating events in the Lake Tahoe Basin. Such a vulnerability assessment is highly complex and dependent on numerous variables such as in-lake travel times, relative concentrations of contaminants, the direction and velocity of advective transport and dispersion rates to name a few. To assist water purveyors understand and prepare response plans to potential impacts from catastrophic contaminant spills, the authors of the Risk Assessment provided a spreadsheet-based simplified pollutant-transport model (*Lake Tahoe Transport Model*). The Lake Tahoe Transport Model was developed as a tool for utilities during a spill event to provide insight as to contaminant risk at their intakes and could be used to estimate¹:

¹ See Lake Tahoe Source Water Protection Risk Assessment, 2008, pp. ES-4 and 84.

Ms. Theresa Avance
July 19, 2012
Page 2 of 5

- a. The likelihood that pollutants from a given contaminant spill would reach the intake to a public water supply,
- b. The amount of time required to reach each effected intake, and
- c. The amount of dispersion that would occur during transport.

It does not, however, calculate or predict probabilities or risks of infections resultant from additional body contact recreation activities near public water supply intakes.

During the fall of 2011, while considering the potential impacts to the Water Company from the pending Edgewood Lodge and Golf Course Improvement Project (Lodge Project), the Board of Directors of the Water Company requested our company's assistance to evaluate the potential risks to the Water Company from that proposed project. The Water Company's Board of Directors wanted to better understand the risks to water quality as evaluated in detail within the Risk Assessment and the likelihood to successfully address those risks by enhancing their water treatment facilities to include either filtration or ultraviolet treatment methods compliant with the requirements of LT-2 (2-log removal/inactivation). To address the Board's expressed concerns we reviewed in detail the Risk Assessment and then prepared a comparative evaluation of the Water Company's intake and treatment means to the three water systems evaluated in the Risk Assessment, again, Burnt Cedar, McKinney/Quail and Kingsbury General Improvement District. The results of our comparative review of the Risk Assessment were summarized in our letter to Mr. Bobby King, General Manager of Edgewood Water Company, dated November 4, 2011; a copy of that letter is attached for your review and information. For your convenience, our specific findings included the following observations:

1. The science used to predict the risks associated with body-contact recreation and vulnerability to contamination from spills, even in lake environments, is complex and dependent on numerous variables. As a result, such assessments of risk result in approximations and probabilities of occurrences. That is, these risks cannot be quantified definitively but must be defined by probabilities of occurrence.
2. The current configuration of the Water Company's intake, being 2,500 feet long and 34 feet deep, is significantly further removed from those persons participating in body-contact recreation at existing beaches or other potential activity centers than the intakes to the water systems that were specifically evaluated in the Risk Assessment. As a result, it is reasonable to assume that the risk to the Water Company's intake is less than the calculated and reported risks to either KGID or the Burnt Cedar water systems. The Risk Assessment found that if the treatment upgrades required by the LT-2 Enhanced Surface Water Treatment Rule (2-log removal) are implemented at Burnt Cedar and KGID, the risk of exceeding EPA's target risk level of 1 per 10,000 visitors/year from body-contact recreation were 0.1% and 0.03%, respectively. Accordingly, once the Water Company implements the LT-2 treatment modifications and improvements, whether UV or micro-filtration, we expect the risk of exceeding EPA's target risk level is less than 0.1% for body-contact recreation activities.

Ms. Theresa Avance
July 19, 2012
Page 3 of 5

3. The Water Company's intake, similar to all other water purveyors within the Basin, is vulnerable to contamination by pollutant spills. In the event that the contaminant spill involves higher concentration of particulate matter, such as a sewage spill, UV inactivation treatment will probably be much less effective for pathogen removal due to the higher concentration of particulate matter than body-contact recreation might generate. The presence of high concentration of particulate matter will tend to lower the UV inactivation rate rendering it potentially less effective than micro filtration for removal of such contaminants.

Although not listed specifically in our letter to Mr. King, in this context it is noteworthy that a specific conclusion reached in the Risk Assessment was that improving water treatment to achieve 2-log removal/inactivation is expected to substantively improve microbial water quality in the finished water.

For your information, the Water Company's Board has since determined to proceed with the design and permitting of upgrades to its treatment methods to achieve 2-log removal/inactivation by using ultraviolet methods to supplement its current disinfection processes (ozone). The Water Company anticipates submitting those designs for review by each agency during the fall 2012 and, subject to receiving requisite approvals, further intends to commence construction in spring or summer 2013.

We have been provided a copy of the comments to the draft Environmental Impact Statement (EIS) for the Lodge Project as provided by TWSA, dated June 27, 2012, as well as those received from Nevada Division of Environmental Protection – Bureau of Safe Drinking Water, which were dated June 28, 2012. To address the comments from each of these agencies seeking additional data to substantiate the findings of the draft EIS, we were requested to use the Lake Tahoe Transport Model to quantify the potential impacts to affected public water supply intakes from a pollution spill in proximity to the proposed beach and pier. To complete this request, we have reviewed the methods and assumptions within the Risk Assessment used for the vulnerability assessment of KGID's intake. Specifically, the authors of the Risk Assessment assumed and then simulated a 50,000 gallon raw sewage spill "... for each of the 42 centermost shoreline segments on each of the ...Kingsbury Grade model grids."² The findings for those simulations included³:

1. "The vulnerability assessment for Kingsbury Grade intake yielded substantially lower peak and event-averaged concentrations when compared with other intakes." The report's author credited this finding to the considerably deeper placement of KGID's intake to the other intakes evaluated.
2. Average concentration: 0.27 oocysts/100 L
3. Travel Time: 5.09 days.

² See Lake Tahoe Source Water Protection Risk Assessment, 2008, pp. 73.

³ Ibid, pp. 80

Ms. Theresa Avance
July 19, 2012
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4. The intake is most vulnerable to spills or other releases 300-500 m to the north, near Nevada Beach and that "...spills to the south of the intake yielded very low predicted concentrations."

As you are aware, the Lodge project is located southerly of KGID's intake. In addition, KGID's intake is approximately 750 feet long and at a depth of 60 feet. As a comparison, the Water Company's intake is approximately 2,500 feet long and at a depth of 34 feet.

We used the Lake Tahoe Transport Model to simulate the probable outcomes from a contaminating event occurring at or very near the beach in proximity to the proposed Lodge project. To understand and attempt to quantify the range of potential results, we used the model to simulate events occurring at two separate locations along the beach: the first, directly east of the Water Company's intake, and the second at a location about 500 feet north of the Water Company's intake. This latter location is closer to, but still about 0.8 miles southerly of KGID's intake and about 1.7 miles from Round Hill's intake. We also varied the initial concentration of contamination from 100 to 500 to test model sensitivity to such input values. From these model runs we have made the following observations:

1. From the assumed spill location that is directly east of Edgewood's intake, the probability that the current is in the direction of Edgewood's intake was found to be 0.5%, but 0% to either KGID's intake or Round Hill's intake.
2. From the assumed spill location that is about 500 feet north of Edgewood's intake, the probability that the current is in the direction of Edgewood's intake was found to be 4.8% and, again, 0% for both KGID's intake as well as Round Hill's intake.
3. In each run, the Median Transit Time to the Edgewood intake for a contaminating event at either of the two tested locations was 5 hours. The Median Transit Time to the intake at KGID ranged from 9 – 10 hours and to the Round Hill intake ranged from 19 – 20 hours.
4. During transport dispersion will dilute contaminants concentrations from the initial values by 99.4 – 99.6% prior to arrival at the Water Company's intake. The effect of dispersion is estimated to fully dilute contaminant concentrations prior to arrival at either the KGID and Round Hill intakes.

For your convenience, I have attaching two summary tables that together list the results from each of these model runs.

Based on the analysis of this data, once the Water Company completes its planned upgrades to its water treatment plant to meet the requirements of LT-2, we expect that the risk of exceeding EPA's target risk level of 1 per 10,000 visitors/year from body-contact recreation, inclusive of the anticipated increased activity from the proposed Lodge project, will be less than 0.1%. The necessary standard of treatment (2-log removal/inactivation) to minimize these potential risks can be safely and prudently achieved utilizing ultraviolet plus ozone water treatment processes. Irrespective of the status of the Lodge project, these upgrades to the Water Company's treatment plant must be made by 2014 to comply with the requirements of LT-2. The Water Company's intake, similar to every other public water

Ms. Theresa Avance
July 19, 2012
Page 5 of 5

supply intake within Lake Tahoe, is vulnerable to being effected by a catastrophic event resulting in a contaminant spill. The Water Company has previously taken appropriate measures to minimize this vulnerability by locating its intake nearly ½-mile away from the beach and at a depth greater than 30 feet. Accordingly, we conclude that the proposed Lodge project will have limited if any impact on the ability of the Water Company to continue to meet federal and state drinking water standards including the provisions of Nevada Administrative Code (NAC) 445A.525.

During your review of this summary, should you have any questions or require any clarifications, I trust you will not hesitate to contact me directly.

Yours faithfully,

R.O. ANDERSON ENGINEERING, INC.



Robert O. Anderson, P.E., W.R.S., CFM
Principal Engineer

Attachments

cc: Jennifer Carr, P.E.
Madonna Dunbar
Brandon Hill
Bobby King
Patrick Rhamey
Andrea Seifert, P.E.
Chuck Sharer
Jim Summers
John Summers



November 4, 2011

Via E-mail and U.S. Mail

Bobby King, General Manager
EDGEWOOD WATER COMPANY
1300 Buckeye Road, Suite A
Minden, NV 89423

**Edgewood Water Company: Water Quality Risk Assessment
Summary of Comparative Review of Results of
Lake Tahoe Source Water Protection Risk Assessment**

Dear Bobby:

As you are aware, John Summers obtained and provided us with a copy of the Final Report entitled *Lake Tahoe Source Water Protection Risk Assessment* as prepared by Black & Veatch, which report is dated October 2008. This report was prepared in conjunction with the Tahoe Water Suppliers' Association and the U.S. Army Corps of Engineers. I am attaching a copy of that full report for your review.

In response to questions from various Board members we have critically reviewed that report for the purpose of being able to summarize its findings for the public water system intakes that were evaluated relative to the existing and proposed conditions (e.g. Lodge project pier proposal) in proximity to EWC's intake. The following paragraphs provide a brief summary of the results of the subject report and a comparison of the configuration of EWC's intake to that of the evaluated intakes.

Due to resource constraints, the subject report evaluated the potential water quality risks at only three separate, existing public water system intakes within the Lake Tahoe Basin. These intakes were Burnt Cedar (Incline Village area), McKinney/Quail (west shore – Tahoe City PUD) and Kingsbury General Improvement District (KGID).

The purpose of the report was to attempt to quantify and assess the water quality risks and probability of infection due to body-contact recreational activities (swimming, water skiing, jet skiing and other forms of direct contact). The authors also included a vulnerability assessment to better understand and evaluate the in-lake transport processes for contamination events (e.g. large sewer spills) within the basin. In both instances, the authors focused their assessment on *Cryptosporidium* due to its low infectious dose and resistance to disinfection, with the expectation that other potential contaminants will generally react and be transported similarly.

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Risk Assessment from Body-contact Recreation:

Table 3-3 of the report provides a summary of the Length, Depth and Distance from Lake Bottom for each public water system included in the report. I have attached a separate copy of that table for your convenience. Using this data, EWC's intake is reported as being extended a minimum of 3.33 times (2,500' v. 750') further out into the lake than the intakes of the water systems evaluated. The depth of EWC's intake, 34 feet, is also deeper than each of the evaluated intakes except KGID's intake.

The report found that there are four beaches (referred to as "Incline Beaches") in relative proximity to the Burnt Cedar intake. The combined annual use of these beaches from 2005 data, were reported as somewhat over 140,000 visitors. Utilizing a variety of statistical methods and numerous assumptions, a total average daily weekday and holiday/weekend use volume was calculated at 442 and 3,270 visitors per day, respectively. Average daily body-contact recreational use was similarly calculated at 221+/-50 and 1550+/-350 for weekdays and holiday/weekends during the summer recreational season, respectively. Using these data, the report found that the median probability¹ of infection is 0.28 per 10,000 per year. According to the report, EPA has set a target risk level of 1 infection per 10,000 visitors per year. Using additional statistical methods and simulations, the author calculated the probability of exceeding that target risk at this location, due solely to *Cryptosporidium*, at 7.6%.

For the McKinney/Quail intake a similar analysis was undertaken. At that west shore location there are fewer beaches contributing and significantly fewer visitors (as you might expect). After all the calculations, the author(s) estimated the average daily body-contact recreational use at 20+/-10 and 140+/-70 for weekdays and holidays/weekends during the summer recreational season, respectively. The model results predicted much lower risk levels than for the Burnt Cedar intake. Specifically, the predicted median annual risk of infection due to *Cryptosporidium* was 7.58×10^{-4} infections per 10,000 visitors/year at this location. The probability of exceeding EPA's target risk level was found to be less than 0.02%.²

The intake at KGID was also evaluated in the context of recreational activities in its proximity and the risk of infection was predicted. The report authors found that there are four locations (Nevada Beach, Lakeside Beach, Pine Wild and Round Hill) near KGID's intake where body-contact recreation occurs. Again, using available data, assumptions similar to those used at the other locations and the statistical analyses of the contributing parameters, it was estimated that an average of 1,440+/-290 and 206+/-41 individuals per day during the summer season weekend/holiday and weekday use, respectively, could be

¹ There is a 50% probability that there will be more than 0.28 infections per 10,000 consumers/visitors per year and a 50% probability that there will be less than that.

² Section 5.4.7, pp. 58.

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realized. Interestingly, the use at Nevada Beach, which as you know is located just north of KGID's intake, was identified as being particularly important due to the projected circulation in this part of the lake and an expected southerly flow path.³ The model results for KGID's intake predicted the median annual risk level for *Cryptosporidium* of 0.23 infections per 10,000 visitors. The probability of exceeding EPA's target risk level of 1 infection per 10,000 visitors per year was, therefore, estimated at 4.9%.⁴

The following table⁵ provides a summary of these analyses by intake and a comparison of the length and depth of each intake relative to Edgewood Water Company's intake:

Intake	Recreational Use (#/yr)	Treatment Efficiency (%)	Infection Risk (#/10,000/yr)	Exceedance Probability (%)	Length (feet)	Depth (feet)
	Median					
Burnt Cedar	129,256	55%	0.28	7.6%	670	30
McKinney/Quail	11,680	99%	0.00076	<0.02%	650	20
KGID	120,176	60%	0.23	4.9%	750	60
Edgewood Water Co.	Not calculated	Not calculated	Not calculated	Not calculated	2,500	34

Section 5.6.4 of the report discusses the ability of improved treatment schemes to substantially reduce the public health risks at both Burnt Cedar and KGID. These treatment methods would necessarily increase the removal and/or inactivation of oocysts from the raw water. The authors of the report estimated that at Burnt Cedar and KGID the use of 2-log removal/inactivation methods would lower the probability of exceeding the EPA target risk level from 7.6 % and 4.9% to 0.1% and 0.03%, respectively. They further concluded that "direct filtration or UV-treatment would both rather easily achieve 2-log removal/inactivation of *Cryptosporidium*."

The methodologies and techniques used to make the above probability estimates are quite complex and dependent on numerous factors that are highly variable between intake sites. Some of these variables include localized bathymetry, projected average flow paths and lake circulation patterns. As a result, the projected probabilities of exceeding the EPA target risk level are not a linear relationship to intake depth or length, or even distances from potential body-contact contamination sources. However, upon EWC's implementation of a 2-log removal/inactivation treatment method as required by LT-2, combined with length

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⁴ Section 5.5.7, pp. 64.

⁵ Similar to Table 5-6, pp. 66, but appended to include physical configuration of each intake including EWC's

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and depth of the intake line, it is reasonable to imagine that the probability of exceeding EPA's target risk level of 1 per 10,000 visitors/year is probably significantly less than 0.5%.

Vulnerability Assessment:

Next, the report evaluated the vulnerability of each of these intakes to sewage and fuel spills and other potential contaminating events within the Basin. The approach and methodologies for making such a vulnerability assessment are highly complex and dependent on numerous variables (e.g. in-lake travel times, relative concentrations of contaminants reaching the intakes, the direction and velocity of advective transport, dispersion rates, etc.). As a result of these complexities, one of the deliverables of the report was a spreadsheet based simplified pollutant-transport model that can be used to estimate:

- a. The likelihood that pollutants from a given source would reach the intake,
- b. The amount of time required to reach the intake, and
- c. The amount of dispersion that would occur during transport.

Similar to the water quality risk assessment summarized above, the authors focused on *Cryptosporidium* to compute the risk from such spills.

Table 6.4 from the report summarized the results of the vulnerability analysis assuming a 50,000 gallon sewage spill near each intake. I have attached a copy of this table for your convenience. You will note that the median risk of infections from such a spill ranged from a low of 0.03⁶ at McKinney/Quail to a high of 0.28 at Burnt Cedar. Unfortunately, the simplified pollutant transport model that was provided does not predict probabilities or risk of infections, so a direct comparison of potential results that EWC might expect is not possible without additional computations and simulations of catastrophic pollutant spills.

The author does note that, in the instance of such a sewage spill, treatment using UV inactivation would probably be much less effective for pathogen removal due to the probable presence of higher concentration of particulate matter than body-contact recreation contamination will generate. The presence of particulate matter would lower the UV inactivation rate and render it less effective than micro filtration for removal of such contamination. In general, the findings of the vulnerability assessment simulations indicate that those regions 0.3 to 1.0 mile upstream of the intakes represent the greatest potential threat to water quality. Sewage spills occurring in regions downstream, even when in relatively close proximity to the intake, were found to have much lower probability of yielding high contamination concentrations.

Prior to the Water Company undertaking a separate risk analysis and vulnerability assessment of the potential impacts related to the proposed pier that is planned with

⁶ infections/10,000 visitors/day

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Edgewood Companies' Lodge project, both Mr. Scharer and Mr. Johnson astutely suggested that we investigate and review what prior studies have been undertaken for the other water purveyors that are similarly affected by public piers. As a result of John Summers' good efforts, we were provided the subject report that directly addressed these same questions for the Lake Tahoe Water Suppliers Association. Although the data that was relied on by the engineers and scientists at Black & Veatch is from 2008, their analysis of these risks to other water intakes seems to be comprehensive and well documented. From a review of their report, we have come to better understand the science and risk to the Water Company's intake due to body-contact recreational activities, which includes typical activities in and around a public pier, as well as the vulnerability of the Water Company to a sewage spill. Based on our detailed review of the subject report we have made the following observations relative to Edgewood Water Company:

1. The science used to predict the risks associated with body-contact recreation and vulnerability to contamination from spills, even in lake environments, is complex and dependent on numerous variables. As a result, such assessments of risk result in approximations and probabilities of occurrences. That is, these risks cannot be discretely determined or predicted.
2. Given the current configuration of the Water Company's intake, being 2,500 feet long and 34 feet deep, it is significantly further removed from those persons participating in body-contact recreation at existing beaches or other potential activity centers than the intakes to the water systems that were evaluated in the subject report. As a result, it is reasonable to assume that the risk to the Water Company is less than the calculated and reported risks to either KGID or the Burnt Cedar water systems. As noted previously, the report found that if the treatment upgrades required by the LT-2 Enhanced Surface Water Treatment Rule (2-log removal) are implemented at Burnt Cedar and KGID, the risk of exceeding EPA's target risk level of 1 per 10,000 visitors/year from body-contact recreation were 0.1% and 0.03%, respectively. Accordingly, once the Water Company implements the LT-2 treatment modifications and improvements, whether UV or micro-filtration, we would expect the risk level will also be less than 0.1% for body-contact recreation activities.
3. The Water Company's intake, similar to all other water purveyors within the Basin, is vulnerable to contamination by pollutant spills. In the event that the contaminant spill involves higher concentration of particulate matter, such as a sewage spill, UV inactivation treatment will probably be much less effective for pathogen removal due to the higher concentration of particulate matter than body-contact recreation might generate. The presence of particulate matter will tend to lower the UV inactivation rate rendering it less effective than micro filtration for removal of such contaminants.

I hope this review and summary of the findings of the subject report are helpful as you weigh the potential need or merit of having a separate water quality risk assessment completed to evaluate the potential impacts to the Water Company due to the pier proposed with the Lodge project.

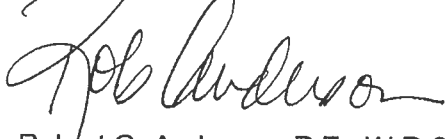
R O Anderson

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November 4, 2011
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During your review of this summary, should you have questions or simply wish to discuss these matters directly, I hope you will contact me.

Yours faithfully,

R.O. ANDERSON ENGINEERING, INC.



Robert O. Anderson, P.E., W.R.S., CFM
Principal Engineer

Attachments

cc: Gordon DePaoli, Esq.
Steve Johnson, CPA
Patrick Rhamey
Chuck Scharer
Scott Schunter
Jim Summers
John Summers

Table 3-3: TWSA Partner Agencies' Intake Length, Depth, and Distance from Lake Bottom*

Agency	Intake	Length (ft)	Depth (ft)	Bottom (ft)	Shoreline Location
Kingsbury GID	Kingsbury Grade	750	60	5	Southeast
Round Hill GID	Round Hill	2,450	52	4	Southeast
Zephyr Water Utility Company	Zephyr	1,100	63	6.5	Southeast
Skyland/Cave Rock	Skyland 1 and 2; Cave Rock 1 and 2	1,800	65	6	East
Incline Village GID	Burnt Cedar	670	30	4	Northeast
Glenbrook Water Company	Glenbrook	1,600	60	6	East
Edgewood Water Company	Edgewood	2,500	34	4	Southeast
North Tahoe PUD	National Avenue	1,800	28	4.75	North
Tahoe City PUD	McKinney/Quail	650	20	3	West
Lakeside Park Association	Lakeside Park Raw Water Intake	3,100	33	n/a	South

* Actual intake depth is dependent upon lake level. Indicated depths have been measured from Lake Rim at 6,229.1 feet



Table 6-4: Summary of results from vulnerability analysis assuming a 50,000 gallon sewage spill near the McKinney/Quail, Burnt Cedar and Kingsbury Grade intakes.

Values represent the median for a spill across the full range of possible spill locations.

	McKinney/Quail	Burnt Cedar	Kingsbury Grade
Average Concentration (oocysts/100 L)	3.02	1.48	0.27
Peak Concentration (oocysts/100 L)	25.3	13.0	1.13
Travel Time (d)	0.85	1.05	5.09
Risk (infections/10,000,day)	0.03	0.28	0.12



Edgewood Water Company: Proposed Lodge Project
Summary of Lake Tahoe Transport Model Runs
16-Jul-12

Location Northing/Easting: 2119965/7147051 (directly east of Edgewood intake at beach)
 Calculation Method: Observed Concentration/Observed Width

Initial Concentration	Edgewood				Kingsbury				Round Hill			
	Prob. of Current Direction (%)		0.5		Prob. of Current Direction (%)		0		Prob. of Current Direction (%)		0	
	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)
100	5	8.13	0.0	100.0%	10	5.8	0.0	100.0%	20	4.09	0.0	100.0%
200	5	16.27	0.1	100.0%	10	11.59	0.0	100.0%	20	8.18	0.0	100.0%
300	5	24.4	0.1	100.0%	10	17.39	0.0	100.0%	20	12.27	0.0	100.0%
400	5	32.53	0.2	100.0%	10	23.19	0.0	100.0%	20	16.36	0.0	100.0%
500	5	40.67	0.2	100.0%	10	28.99	0.0	100.0%	20	20.45	0.0	100.0%

Location Northing/Easting: 2119965/7147051 (directly east of Edgewood intake at beach)
 Calculation Method: Observed Concentration/Calculated Width

Initial Concentration	Edgewood				Kingsbury				Round Hill			
	Prob. of Current Direction (%)		0.5		Prob. of Current Direction (%)		0		Prob. of Current Direction (%)		0	
	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)
100	5	12.5	0.1	99.9%	10	8.92	0.0	100.0%	20	6.3	0.0	100.0%
200	5	25	0.1	99.9%	10	17.84	0.0	100.0%	20	12.6	0.0	100.0%
300	5	37.5	0.2	99.9%	10	26.76	0.0	100.0%	20	18.9	0.0	100.0%
400	5	50	0.3	99.9%	10	35.68	0.0	100.0%	20	25.19	0.0	100.0%
500	5	62.5	0.3	99.9%	10	44.6	0.0	100.0%	20	31.49	0.0	100.0%

Note: Estimated Concentration is product of Maximum Expected Concentration times Probability of Current Direction.

**Edgewood Water Company: Proposed Lodge Project
Summary of Lake Tahoe Transport Model Runs
16-Jul-12**

Location Northing/Easting: 2120475/7147039 (500' north of Edgewood intake at beach)
Calculation Method: Observed Concentration/Observed Width

Initial Concentration	Edgewood				Kingsbury				Round Hill			
	Prob. of Current Direction (%)		4.8		Prob. of Current Direction (%)		0		Prob. of Current Direction (%)		0	
	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)	Median Transit Time (hours)	Max. Expected Concentration	Estimated Concentration	Estimated Dilution (%)
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200	5	16.13	0.8	99.6%	9	12.1	0.0	100.0%	19	8.4	0.0	100.0%
300	5	24.2	1.2	99.6%	9	18.15	0.0	100.0%	19	12.59	0.0	100.0%
400	5	32.26	1.5	99.6%	9	24.2	0.0	100.0%	19	16.79	0.0	100.0%
500	5	40.33	1.9	99.6%	9	30.25	0.0	100.0%	19	20.99	0.0	100.0%

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100	5	12.4	0.6	99.4%	9	9.31	0.0	100.0%	19	6.46	0.0	100.0%
200	5	24.79	1.2	99.4%	9	18.61	0.0	100.0%	19	12.93	0.0	100.0%
300	5	37.19	1.8	99.4%	9	27.92	0.0	100.0%	19	19.39	0.0	100.0%
400	5	49.59	2.4	99.4%	9	37.23	0.0	100.0%	19	25.85	0.0	100.0%
500	5	61.99	3.0	99.4%	9	46.53	0.0	100.0%	19	32.32	0.0	100.0%

Note: Estimated Concentration is product of Maximum Expected Concentration times Probability of Current Direction.

November 4, 2011

Via E-mail and U.S. Mail

Bobby King, General Manager
EDGEWOOD WATER COMPANY
1300 Buckeye Road, Suite A
Minden, NV 89423

**Edgewood Water Company: Water Quality Risk Assessment
Summary of Comparative Review of Results of
Lake Tahoe Source Water Protection Risk Assessment**

Dear Bobby:

As you are aware, John Summers obtained and provided us with a copy of the Final Report entitled *Lake Tahoe Source Water Protection Risk Assessment* as prepared by Black & Veatch, which report is dated October 2008. This report was prepared in conjunction with the Tahoe Water Suppliers' Association and the U.S. Army Corps of Engineers. I am attaching a copy of that full report for your review.

In response to questions from various Board members we have critically reviewed that report for the purpose of being able to summarize its findings for the public water system intakes that were evaluated relative to the existing and proposed conditions (e.g. Lodge project pier proposal) in proximity to EWC's intake. The following paragraphs provide a brief summary of the results of the subject report and a comparison of the configuration of EWC's intake to that of the evaluated intakes.

Due to resource constraints, the subject report evaluated the potential water quality risks at only three separate, existing public water system intakes within the Lake Tahoe Basin. These intakes were Burnt Cedar (Incline Village area), McKinney/Quail (west shore – Tahoe City PUD) and Kingsbury General Improvement District (KGID).

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November 4, 2011
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Similar to the water quality risk assessment summarized above, the authors focused on *Cryptosporidium* to compute the risk from such spills.

Table 6.4 from the report summarized the results of the vulnerability analysis assuming a 50,000 gallon sewage spill near each intake. I have attached a copy of this table for your convenience. You will note that the median risk of infections from such a spill ranged from a low of 0.03⁶ at McKinney/Quail to a high of 0.28 at Burnt Cedar. Unfortunately, the simplified pollutant transport model that was provided does not predict probabilities or risk of infections, so a direct comparison of potential results that EWC might expect is not possible without additional computations and simulations of catastrophic pollutant spills.

The author does note that, in the instance of such a sewage spill, treatment using UV inactivation would probably be much less effective for pathogen removal due to the probable presence of higher concentration of particulate matter than body-contact recreation contamination will generate. The presence of particulate matter would lower the UV inactivation rate and render it less effective than micro filtration for removal of such contamination. In general, the findings of the vulnerability assessment simulations indicate that those regions 0.3 to 1.0 mile upstream of the intakes represent the greatest potential threat to water quality. Sewage spills occurring in regions downstream, even when in relatively close proximity to the intake, were found to have much lower probability of yielding high contamination concentrations.

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Edgewood Companies' Lodge project, both Mr. Scharer and Mr. Johnson astutely suggested that we investigate and review what prior studies have been undertaken for the other water purveyors that are similarly affected by public piers. As a result of John Summers' good efforts, we were provided the subject report that directly addressed these same questions for the Lake Tahoe Water Suppliers Association. Although the data that was relied on by the engineers and scientists at Black & Veatch is from 2008, their analysis of these risks to other water intakes seems to be comprehensive and well documented. From a review of their report, we have come to better understand the science and risk to the Water Company's intake due to body-contact recreational activities, which includes typical activities in and around a public pier, as well as the vulnerability of the Water Company to a sewage spill. Based on our detailed review of the subject report we have made the following observations relative to Edgewood Water Company:

1. The science used to predict the risks associated with body-contact recreation and vulnerability to contamination from spills, even in lake environments, is complex and dependent on numerous variables. As a result, such assessments of risk result in approximations and probabilities of occurrences. That is, these risks cannot be discretely determined or predicted.
2. Given the current configuration of the Water Company's intake, being 2,500 feet long and 34 feet deep, it is significantly further removed from those persons participating in body-contact recreation at existing beaches or other potential activity centers than the intakes to the water systems that were evaluated in the subject report. As a result, it is reasonable to assume that the risk to the Water Company is less than the calculated and reported risks to either KGID or the Burnt Cedar water systems. As noted previously, the report found that if the treatment upgrades required by the LT-2 Enhanced Surface Water Treatment Rule (2-log removal) are implemented at Burnt Cedar and KGID, the risk of exceeding EPA's target risk level of 1 per 10,000 visitors/year from body-contact recreation were 0.1% and 0.03%, respectively. Accordingly, once the Water Company implements the LT-2 treatment modifications and improvements, whether UV or micro-filtration, we would expect the risk level will also be less than 0.1% for body-contact recreation activities.
3. The Water Company's intake, similar to all other water purveyors within the Basin, is vulnerable to contamination by pollutant spills. In the event that the contaminant spill involves higher concentration of particulate matter, such as a sewage spill, UV inactivation treatment will probably be much less effective for pathogen removal due to the higher concentration of particulate matter than body-contact recreation might generate. The presence of particulate matter will tend to lower the UV inactivation rate rendering it less effective than micro filtration for removal of such contaminants.

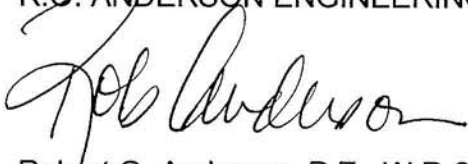
I hope this review and summary of the findings of the subject report are helpful as you weigh the potential need or merit of having a separate water quality risk assessment completed to evaluate the potential impacts to the Water Company due to the pier proposed with the Lodge project.

Mr. Bobby King
November 4, 2011
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During your review of this summary, should you have questions or simply wish to discuss these matters directly, I hope you will contact me.

Yours faithfully,

R.O. ANDERSON ENGINEERING, INC.



Robert O. Anderson, P.E., W.R.S., CFM
Principal Engineer

Attachments

cc: Gordon DePaoli, Esq.
Steve Johnson, CPA
Patrick Rhamey
Chuck Scharer
Scott Schunter
Jim Summers
John Summers

Table 3-3: TWSA Partner Agencies' Intake Length, Depth, and Distance from Lake Bottom*

Agency	Intake	Length (ft)	Depth (ft)	Bottom (ft)	Shoreline Location
Kingsbury GID	Kingsbury Grade	750	60	5	Southeast
Round Hill GID	Round Hill	2,450	52	4	Southeast
Zephyr Water Utility Company	Zephyr	1,100	63	6.5	Southeast
Skyland/Cave Rock	Skyland 1 and 2; Cave Rock 1 and 2	1,800	65	6	East
Incline Village GID	Burnt Cedar	670	30	4	Northeast
Glenbrook Water Company	Glenbrook	1,600	60	6	East
Edgewood Water Company	Edgewood	2,500	34	4	Southeast
North Tahoe PUD	National Avenue	1,800	28	4.75	North
Tahoe City PUD	McKinney/Quail	650	20	3	West
Lakeside Park Association	Lakeside Park Raw Water Intake	3,100	33	n/a	South

* Actual intake depth is dependent upon lake level. Indicated depths have been measured from Lake Rim at 6,229.1 feet



Table 6-4: Summary of results from vulnerability analysis assuming a 50,000 gallon sewage spill near the McKinney/Quail, Burnt Cedar and Kingsbury Grade intakes.

Values represent the median for a spill across the full range of possible spill locations.

	McKinney/Quail	Burnt Cedar	Kingsbury Grade
Average Concentration (oocysts/100 L)	3.02	1.48	0.27
Peak Concentration (oocysts/100 L)	25.3	13.0	1.13
Travel Time (d)	0.85	1.05	5.09
Risk (infections/10,000,day)	0.03	0.28	0.12



