

# **Appendix 0**

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**Comments on the Draft EIR/EIS/EIS  
and Responses**



# COMMENTS ON THE DRAFT EIR/EIS/EIS AND RESPONSES

This Final EIR/EIS/EIS includes all comments on the Draft EIR/EIS/EIS received during the public review period and responses to substantive comments, including those comments raising environmental issues. All written comment letters and transcripts or summaries of oral comments provided at public hearings are included in this final document. As described in Chapter 1, “Introduction,” of this Final EIR/EIS/EIS, a 75-day public and agency review period for the Draft EIR/EIS/EIS began on April 24, 2017 and ended on July 7, 2017. During the review period, public hearings were held on June 9, June 14, and June 28, 2017 to accept comments on the Draft EIR/EIS/EIS.

## FORMAT OF COMMENTS AND RESPONSES

Comment letters and responses to comments in this chapter of the Final EIR/EIS/EIS are arranged into the following categories:

- ▲ Agencies,
- ▲ Organizations,
- ▲ Individuals,
- ▲ Public Hearings, and
- ▲ Letters Received after the Close of the Comment Period.

Each letter and each comment within a letter have been given an identification number. Responses are numbered so that they correspond to the associated comment. Where appropriate, responses are cross-referenced between letters or to a master response. Master responses are provided for topics that are raised by multiple commenters and/or would benefit from a more multi-faceted or integrated response than would be provided to address a single comment.

Some of the comments received on the Draft EIR/EIS/EIS do not address environmental issues or the adequacy of the Draft EIR/EIS/EIS and instead offer design suggestions or preference for a project alternative. This Final EIR/EIS/EIS does not provide detailed responses to comments that address design matters or that do not relate to the adequacy of the document or the environmental analysis; rather, the commenter suggestions and recommendations for specific alternatives are noted and included in this Final EIR/EIS/EIS, which will be reviewed by the decision makers.

## LIST OF COMMENTERS

Table 1 provides a list of all agencies, organizations, and persons who submitted comments on the Draft EIR/EIS/EIS during the public review period. The comment letters were arranged into the above-listed categories and then placed in alphabetical order before numbering them sequentially. Agency comment letters were organized to include federal agency letters first, followed by state and local agency letters.

**Table 1 List of Commenters**

Letter/Hearing #	Commenter	Date of Comment (Date Received, if different)
<b>Agencies</b>		
1	U.S. Department of Interior	July 5, 2017
2	U.S. Environmental Protection Agency	June 30, 2017
3	California Tahoe Conservancy and Nevada Division of State Parks	July 7, 2017
4	California State Clearinghouse	June 16, 2017
5	Nevada Division of State Lands	June 30, 2017
6	Nevada State Clearinghouse	July 3, 2017
7	Nevada State Historic Preservation Office	July 3, 2017
8	City of South Lake Tahoe	July 7, 2017
9	South Tahoe Public Utility District	July 7, 2017
<b>Organizations</b>		
10	Lake Tahoe South Shore Chamber of Commerce	June 23, 2017
11	League to Save Lake Tahoe	July 7, 2017
12	Sierra Club, Tahoe Area Sierra Club Group	June 30, 2017
13	South Tahoe Chamber of Commerce	July 1, 2017
14	South Tahoe Alliance of Resorts	July 7, 2017
15	Tahoe Meadows Association	July 3, 2017
16	Tahoe Meadows Homeowners Association	June 7, 2017
<b>Individuals</b>		
17	Roger Adams	June 15, 2017
18	Sherry Albrink	June 14, 2017
19	Cody Bass	July 7, 2017
20	Michele Basta	July 7, 2017
21	Frank and Gayle Boitano	June 30, 2017
22	Carol Daum	May 1, 2017
23	Fritz Eriksen	No date
24	Jerome Evans	July 6, 2017
25	Carol Gass	June 24, 2017
26	John Gladding	April 26, 2017
27	John Gladding	July 7, 2017
28	Bruce Grego	July 6, 2017
29	John Grigsby	July 7, 2017
30	Clay Grubb	May 9, 2017
31	Ann Harmon	May 30, 2017
32	Richard J. Haynes	June 2, 2017
33	Michael Howard	June 28, 2017
34	Debbie Klee	May 14, 2017
35	Jurg Lang	July 3, 2017



**Table 1 List of Commenters**

Letter/Hearing #	Commenter	Date of Comment (Date Received, if different)
36	Lucien Bruce and Elizabeth P. Lindsey	July 6, 2017
37	Julie Martin	July 5, 2017
38	Erin McCune	June 27, 2017
39	Marc Mejia	April 26, 2017
40	John Messina	June 9, 2017
41	John Messina	July 6, 2017
42	Peter Miroyan	June 29, 2017
43	Patricia Murphy	July 7, 2017
44	Mary Nastronero	July 3, 2017
45	Diane Nico	July 5, 2017
46	William Nico	July 5, 2017
47	Stephen Petty	June 20, 2017
48	Mike Ross	June 13, 2017
49	Brad Shumate	July 6, 2017
50	Brad Shumate	July 6, 2017
51	Megan Siler	June 13, 2017
52	Craig Southwick	June 23, 2017
53	Susan Steinhauser and Daniel Greenberg	July 6, 2017
54	John Telfer	June 26, 2017
55	Gerald H. and Susan Shinkle Trautman	July 1, 2017
56	Diane Williams	June 14, 2017
<b>Public Hearings</b>		
57	Transcript for the Public Hearing at the TTD Board Meeting	June 9, 2017
58	Comment Summary Notes from the TRPA APC Meeting	June 14, 2017
59	Comment Summary Notes from the TRPA Governing Board Meeting	June 28, 2017
<b>Letters Received after the Close of the Comment Period</b>		
60	Scott Cook	July 6, 2017
61	Bob Miroyan	June 29, 2017
62	Phillip Nico	July 6, 2017
63	Peter Nico	July 7, 2017
64	Maureen Richardson	July 8, 2017
65	Alfred C. Schmidt	July 9, 2017
66	California Department of Justice, Attorney General's Office	August 15, 2017
Source: Compiled by Ascent Environmental in 2018		

## RESPONSES TO COMMENTS ON THE DRAFT EIR/EIS/EIS

Responses to substantive comments and significant environmental issues raised in written and oral public comments on the US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS are provided in this section. All comment letters are reproduced in their entirety, followed by written responses. Where a commenter has provided multiple comments, each comment is indicated by brackets and an identifying number notation in the margin of the comment letter. Responses in this section include master responses and specific responses. Master responses are presented first. They address comment topics raised by multiple commenters and/or issues that would benefit from a more comprehensive response than would be provided in a single, focused, individual response. The following topics are discussed in the master responses:

1. Adequacy of Vehicle Miles Traveled (VMT) Analysis
2. Effects on Access to Tahoe Meadows Historic District

Specific responses are intended to address the topic(s) raised by a particular comment. Responses are numbered to correspond to specific comments in each comment letter. To assist the reader, a paraphrased summary of the key comment issue is provided at the beginning of each response. In some instances, the responses to comments may warrant modification of the text of the Draft EIR/EIS/EIS. In those cases, information that is to be deleted is shown in strikethrough (~~strikethrough~~) and additions are shown in underline (underline). Text changes resulting from comments and their accompanying responses have been incorporated into the original Draft EIR/EIS/EIS text, as indicated in the responses.

All of the text changes made in response to public comments result in minor modifications to the original Draft EIR/EIS/EIS text, as explained in the “Summary” chapter and demonstrated in the body of Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures,” of this Final EIR/EIS/EIS. None of the changes included in this Final EIR/EIS/EIS resulted in new significant environmental effects or a substantial increase in the severity of any previously identified significant effects; thus, the changes do not warrant recirculation of all or part of the Draft EIR/EIS/EIS for another public review.

## Master Responses

### MASTER RESPONSE 1: ADEQUACY OF VMT ANALYSIS

Several comments pertain to the Draft EIR/EIS/EIS’s assessment of vehicle miles traveled (VMT). This master response aggregates and responds to common subjects within the comments on this topic. To provide a comprehensive response to comments on the VMT analysis, this response addresses the following topics raised in comments:

- ▲ the environmental document prepared for the 2012 RTP/SCS was a programmatic EIR and a project EIR can only rely on a programmatic EIR to avoid analyzing impacts, if the project does not have any new effects not analyzed in the programmatic EIR;
- ▲ the project-related 0.4-mile increase in travel length exceeds the 0.3-mile maximum additional length that the California Governor’s Office of Planning and Research (OPR) considers a cut-off point for where VMT increases may not occur;
- ▲ the Draft EIR/EIS/EIS improperly tiers from the 2012 RTP/SCS EIR/EIS because it does not notify the public that tiering was occurring;
- ▲ the project has an impact (an increase in VMT) that was not considered in the programmatic EIR for the 2012 RTP/SCS;

- ▲ some of the projects within the 2012 RTP/SCS are ambitious and not guaranteed to be completed and it is improper to declare the project's impact on VMT as beneficial based on an aspirational collection of projects that may never be completed;
- ▲ reliance on the 2012 RTP/SCS to conclude without analysis that the project's impact on VMT is beneficial is inadequate because the 2012 RTP/SCS did not apply TRPA's threshold standard, rather it considered per capita VMT only;
- ▲ the project should include a transit pilot project to address the project's contribution to cumulative VMT increases beyond the phased release of land use allocations identified as mitigation in the 2012 RTP/SCS and 2017 RTP, and codified in Section 50.4.3 of the TRPA Code of Ordinances; and
- ▲ the EIR/EIS/EIS should disclose localized VMT increases.

### Overview of Draft EIR/EIS/EIS Findings Related to VMT

Sections 3.6, "Traffic and Transportation," and Section 3.19, "Cumulative Impacts," of the Draft EIR/EIS/EIS disclose the VMT impacts on transportation and circulation from implementation of the US 50/South Shore Community Revitalization Project alternatives.

Impacts 3.6-4 and 3.6-14, Cumulative Impact 3.6-14, and Section 3.19.3 of the Draft EIR/EIS/EIS disclose that implementation of the realignment alternatives (Alternatives B, C, and D) would create the opportunity for community revitalization in the Stateline/South Lake Tahoe tourist core, consistent with the approved RTP/SCS (originally named Alternative 3 in the 2012 RTP/SCS EIR/EIS), and the approved RTP/SCS would have a beneficial effect by reducing regional per capita VMT. The opportunity for community revitalization would be the source of reduced VMT, because visitor uses could be concentrated in a compact, pedestrian/bicycle/transit-served urban core, decreasing the need to take vehicle trips to reach some tourism destinations. The Draft EIR/EIS/EIS recognizes that realignment would cause a small localized increase in VMT because the realigned route under Alternative B would be 0.4 mile longer around the tourist core than the current US 50 alignment straight through it; however, the project's mobility enhancements and revitalization of planned development in an urban center would be consistent with attaining the regional total VMT threshold (as required by the Lake Tahoe Regional Plan and evaluated in the Regional Plan Update EIS). As a result, the Draft EIR/EIS/EIS determined that Alternatives B, C, and D would promote continued attainment and maintenance of TRPA's VMT threshold standard, resulting in a beneficial impact on regional VMT.

Further, as suggested in comments received on the Draft EIR/EIS/EIS, TTD has included a transit circulator as part of the project description of Alternative B, the locally preferred alternative, which would contribute to VMT reductions in the immediate area. The transit circulator is a specific expression of the general element of the proposed project to provide opportunities for enhanced transit as a component of the project's multimodal features that have been previously described in the Draft EIR/EIS/EIS (see Section 2.3.3, "Corridor Improvements and Enhanced Bicycle, Transit, and Pedestrian Facilities") and in the 2012 RTP/SCS EIR/EIS (see Section 2.8.1, "RTP/SCS Components"). It would involve new transit service between Heavenly Village Center, Stateline Transit Center, and the various casino parking lots. See the discussion under the header "Project Refinements to Alternative B," in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS for additional information.

### Within the Scope of the 2012 RTP/SCS Program EIR

As described in Section 3.19.3, "Cumulative Impacts Addressed in the RTP/SCS EIR/EIS," of the Draft EIR/EIS/EIS (beginning on page 3.19-3), the US 50/South Shore Community Revitalization Project is included in the list of projects to be undertaken to implement the RTP/SCS. The RTP is a long-range plan to develop a transportation system in the Tahoe Region that supports a healthy community, prosperous economy, and sustainable environment and mitigates existing adverse mobility and environmental conditions. The SCS is an integrated land use and transportation plan to meet adopted goals for the reduction in greenhouse gas (GHG) emissions, in compliance with California's Senate Bill (SB) 375, Statutes of 2008.

The RTP/SCS originally approved in December 2012, and most recently updated in April 2017, implements many of the contemporary concepts necessary to achieve the Region's transportation and greenhouse gas reduction vision. These concepts include integration between land use planning and transportation; bringing work, shopping, recreation, housing, and lodging closer together; improving the linkage of development to a multi-modal transportation system; closing gaps in the existing bicycle and pedestrian network; enhancing transit service; and revitalizing communities through corridor enhancement projects that improve mobility for all travel modes.

In December 2012, prior to approval of the RTP/SCS, a Program EIR/EIS was certified for the plan. In accordance with Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. The proposed RTP/SCS EIR/EIS met these criteria for use of a Program EIR (TMPO and TRPA 2012a:1-3).

As noted in Section 15168(c), subsequent proposed activities that are consistent with the RTP/SCS, such as individual transportation projects, are examined in light of the information in the Program EIR to determine whether an additional environmental document must be prepared. If the lead agency for a transportation project that is consistent with the RTP/SCS (such as the US 50/South Shore Community Revitalization Project) finds that, pursuant to CEQA Guidelines Section 15168(c)(2), no new significant effects would occur and no new mitigation measures would be required for a subsequent project, the activity can be approved as being within the scope of the RTP/SCS and the Program EIR, and no new environmental documentation would be required. In this situation, the lead agency must incorporate all feasible mitigation measures from the Program EIR into the subsequent project, as needed, to address significant or potentially significant effects on the environment covered by the Program EIR. The mitigation measures pertaining to VMT presented in the RTP/SCS EIR/EIS associated with the phased release of land use allocations are codified in Section 50.4.3 of the TRPA Code of Ordinances (TMPO and TRPA 2012a:1-3). There were no additional mitigation measures to be incorporated into later projects.

A Program EIR provides a regional consideration of cumulative effects and includes broad policy alternatives and program-level mitigation measures that are equally broad in scope. The Program EIR prepared for the RTP/SCS provided a regional-scale analysis, including related to VMT, and a framework of mitigation measures for subsequent, site-specific environmental review documents prepared by lead agencies in the Region as individual planning, development, and transportation projects are identified, designed, and move through the planning, review, and decision-making process. Because the 2012 RTP/SCS EIR/EIS served as the program environmental document for the US 50/South Shore Community Revitalization Project and the project is contemplated and included in the RTP/SCS project description, the project is a subsequent activity of the RTP/SCS and is consistent with and within the scope of the program EIR/EIS. The 2012 RTP/SCS EIR/EIS did not evaluate site-specific impacts of the project (e.g., scenic, cultural resources, and housing impacts), which are addressed fully in the Draft EIR/EIS/EIS.

One of the fundamental purposes of the RTP/SCS EIR/EIS was to consider all of the transportation projects included on the RTP list for future funding and evaluate the collective effects of those projects, as well as what was known about them individually at the time. The proposed project was one of the projects featured on the RTP list, as was enhanced transit, including BlueGo transit capital and operational enhancements (TMPO and TRPAa 2012a:2-25). While BlueGo transit has been replaced with TTD operating these transit services, these enhancements are still proposed. The 2012 RTP/SCS and its EIR/EIS defined the US 50/South Shore Community Revitalization Project as follows:

- ▲ the realignment of US 50 in the Stateline casino corridor area and the conversion of the existing US 50 roadway, between a location southwest of Pioneer Trail in California and Lake Parkway in Nevada, into a two-lane roadway (one travel lane in each direction) with a center, landscaped median and turn pockets at major driveways and intersections (TMPO and TRPA 2012a: 2-10); and

- US 50 would be realigned around the Stateline casino corridor area to the east, between Lake Parkway in Nevada and a location southwest of Pioneer Trail in California. The new US 50 alignment would include two travel lanes in each direction with left-turn pockets at intersections. Between Pioneer Trail and Lake Parkway within the casino corridor, US 50 would become a local street and would be converted to two lanes, one way in each direction, with a landscaped median and turn pockets at major driveways and intersections. Expanded sidewalks, bicycle lanes, and traffic signals would be installed to improve the flow of traffic, improve pedestrian safety, and encourage the use of non-auto transportation modes along the roadway (TMPO and TRPA 2012b:4-6).

Thus, the 2012 RTP/SCS EIR/EIS considered within its regional analysis the VMT impacts of the project.

Consistent with CEQA Guidelines Section 15168(c), the US 50/South Shore Community Revitalization Project is within the scope of the RTP/SCS covered by a Program EIR, because the description of the project was contemplated at the time of preparation of the RTP/SCS and the current project is consistent with this description, geographic area analyzed for environmental impacts, and is part of the covered infrastructure. The VMT analysis anticipated that localized changes in VMT would occur in association with individual roadway projects. For example, while the US 50/South Shore Community Revitalization Project would result in incremental increases in localized VMT, other capital improvement projects contemplated in the 2012 RTP/SCS, such as the SR 89/Fanny Bridge Community Revitalization Project, would result in localized decreases in VMT. The SR 89/Fanny Bridge Project would result in a small decrease in VMT due to the relocated wye intersection, because through trips along SR 89 would be approximately 0.5-mile shorter (TTD/TRPA/FHWA-CFLHD 2014:4.15-42).

While the proposed realignment of the highway may result in a small increase in localized VMT the redistribution of land uses into a “town center” or “mobility hub” created by the revitalization associated with the project would reduce vehicle trips and trip lengths by decreasing the distance between housing, jobs, and services, and potentially eliminating the need for some trips to/from neighboring communities or between residences and neighborhood services. The new transit, pedestrian, and bicycle facilities that would be constructed as part of the project would also encourage the use of non-vehicular modes of travel once an individual has arrived at the project area. However, the relevant environmental significance conclusions for VMT depends on the regional, cumulative analysis of VMT to determine conformance with SB 375 reduction targets, consistency with TRPA thresholds after mitigation, and environmental impact significance. Thus, the analysis approach did not account for these localized improvements created by the “town center.”

Region-wide VMT impact was found to be beneficial on the basis of VMT per capita and less than significant after mitigation for total regional VMT in the 2012 RTP/SCS, 2012 RPU, and 2017 RTP environmental documents. The VMT impacts are determined to be less than significant for the proposed project and an individualized VMT analysis unnecessary because the US 50/South Shore Community Revitalization Project is included in the RTP/SCS project list and, therefore, evaluated as part of the cumulative analysis in those environmental documents. This determination approach is consistent with the current CEQA Guidelines and the amendments to the CEQA Guidelines proposed by OPR (OPR 2017). Therefore, no additional VMT analysis is necessary or warranted, because the proposed project is a later activity that is within the scope of the RTP/SCS program.

### Use of TRPA’s VMT Threshold Standard

Some comments contend that reliance on the 2012 RTP/SCS is inadequate to conclude without further, project-specific analysis that the project’s impact on per capita VMT is beneficial, because the 2012 RTP/SCS did not apply TRPA’s threshold standard for VMT. The commenters suggest that the 2012 RTP/SCS looked only at per capita VMT, which is incorrect. The net change in VMT per capita is provided for informational purposes and is a useful metric from a planning perspective as it relates to the reduction target for SB 375. The 2012 RTP/SCS EIR/EIS shows that per capita VMT would decrease with implementation of the RTP/SCS compared to existing conditions. That information was important for the public and decision-makers to understand that the RTP/SCS plan area would become more VMT-efficient under the proposed RTP/SCS than under existing conditions. Impacts to the Region-wide VMT threshold are disclosed and fully evaluated in Impact 3.3-3 (TMPO

and TRPA 2012a: Table 3.3-16). The environmental review for the 2012 RTP/SCS, 2012 RPU, and 2017 RTP/SCS are fully coordinated, using the same methodology for estimating VMT and forecast VMT at buildout that exceeds the TRPA 2,030,938 VMT Threshold. The mitigation presented in the certified environmental documents for these plans requires the phased release of land use allocations followed by monitoring and forecasting of actual roadway traffic counts and VMT. (The conclusions of the 2012 RPU EIS were challenged in court and found to be legally satisfactory.)

### **Requests for Localized VMT Analysis**

Some comments suggest that the EIR/EIS/EIS should include a local-scale analysis of VMT that would identify the increase in VMT associated with the project.

The Draft EIR/EIS/EIS evaluates the localized transportation effects of the project in Section 3.6, “Traffic and Transportation.” It discloses forecasted traffic volumes on individual roadway segments and intersections within the study area (see Draft EIR/EIS/EIS Tables 3.6-13, 3.6-14, 3.6-22, 3.6-23, 3.6-24, and 3.6-25). The Draft EIR/EIS/EIS evaluates the effects of the alternatives on the level of service of key roadway segments (Draft EIR/EIS/EIS Impacts 3.6-3 and 3.6-13) and key intersections (Draft EIR/EIS/EIS Impacts 3.6-1, 3.6-2, and 3.6-12). It also evaluates the effects of the alternatives on bicycle and pedestrian facilities (Impacts 3.6-5 and 3.6-15); transit (Impacts 3.6-6 and 3.6-16); vehicular, bicycle, and pedestrian safety (Impacts 3.6-8 and 3.6-18); emergency access (Impacts 3.6-9 and 3.6-19); construction-related traffic and parking impacts (Impacts 3.6-7, 3.6-10, 3.6-17); and permanent parking impacts (Impact 3.6-11). These impacts are analyzed using the geography within which the impact would occur (i.e., across the study area, or at the local roadway segment or intersection).

In contrast, VMT is a regional or larger scale metric that has been used to reflect transportation-related effects on air quality and greenhouse gas emissions. Air quality impacts occur at the scale of the Lake Tahoe Air Basin, and greenhouse gas impacts occur at the global scale. In recognition of this fact, TRPA has adopted a VMT threshold standard that applies at the air basin scale (i.e., the Lake Tahoe Region). Compliance with SB 375 is also determined at a regional scale, i.e., the TMPO territory in California. The Draft EIR/EIS/EIS analyzes the effects of the alternatives on VMT at the regional scale (within which these impacts would meaningfully be described), consistent with the adopted TRPA standard and SB 375 reduction target (see Draft EIR/EIS/EIS Impacts 3.6-4 and 3.6-14, Cumulative Impact 3.6-14, and Section 3.19.3, “Cumulative Impacts Addressed in the RTP/SCS EIR/EIS”).

The only available threshold for VMT is region-wide. No threshold has been developed to determine whether VMT within a project locale or other particular sub-area would be significant, because the metric is meaningful at a regional, rather than localized, scale. The Draft EIR/EIS/EIS appropriately evaluated the VMT effects of the project at the scale that provides meaningful information in relation to established standards and/or targets, i.e., the Lake Tahoe region. However, for informational purposes, project engineers have conducted an estimate of VMT as part of this Final EIR/EIS/EIS. The additional analysis has been incorporated into Appendix I of this Final EIR/EIS/EIS and is summarized here.

The project-level analysis of VMT is based on data taken from the latest versions of the TRPA Regional Travel Demand Model (TDM) and the Tahoe Regional Trip Reduction Impact Assessment (TRIA) tool. The TRIA tool was developed in support of the RTP to determine the effects of the various vehicle trip reduction strategies implemented as part of the RTP. Trip reduction strategies include actions such as concentrating new development in town centers, and implementing parking management strategies, transit service and facilities, and bicycle and pedestrian facilities. TRPA’s travel model is calibrated at a regional level for analysis of the latest RTP. Using the model for the granular analysis of project-specific VMT is not ideal, because regional models typically have lesser precision at a project level; however, it is reasonable to apply the model to this project for the purpose of endeavoring to obtain a general understanding of its impact on VMT, because it is the best available tool. The analysis considered future year traffic volumes that enter the project site from the east or west and depart the project area on the opposite side.

The first steps in the analysis considered future design year average daily traffic volumes (ADT) used in the Draft EIR/EIS/EIS and multiplied the ADT on the new highway alignment by the 0.4-mile increase in trip length. The analysis accounts for existing “cut-through” traffic that navigates through the Rocky Point neighborhood via Chonokis Road and Montreal Road (estimated to be approximately 8,000 to 10,000 vehicles per day). The cut-through trips are already traversing a distance as long, or longer than the new US 50 alignment. Since the cut-through trips would be rerouted to the new US 50 alignment and are already traveling a similar distance, these trips would not contribute to an increase in VMT and were excluded from the change in VMT estimation. Based on this basic calculation, the realignment would result in an increase of approximately 7,000 VMT/day due to the 0.4-mile longer highway alignment.

The next step in the analysis considered the effect that other features of the project would have on VMT. The TRIA tool was used to approximate the percent reduction in vehicle trips due to project features such as providing housing within the tourist core; enhanced pedestrian, bicycle, and transit infrastructure; and implementation of a new transit circulator in the tourist core. Housing within the town center or mobility hub would reduce vehicle trips and trip lengths by decreasing the distance between housing, jobs, and services, and would potentially eliminate the need for some trips to/from neighboring communities (e.g., the Wye or Ski Run areas) or between residences and neighborhood services. The proposed transit, pedestrian, and bicycling facilities would encourage the use of non-vehicular modes of travel once an individual has arrived in the area. Trip reduction rates were approximated for each feature using the rates of the comparable strategies in the TRIA tool. For example, by providing centralized, shared parking, the TRIA tool allows a reduction of approximately 1.32 percent to the trips associated with the project. To calculate the project-related local VMT effect, this total reduction percentage was then applied to future design year trips obtained from the TRPA TDM origin destination data multiplied by an approximate average trip length.

When evaluating the average lengths of trips that would be reduced due to project features, a range of values were considered. If it were assumed that the proposed project features would not reduce any vehicular trips that travel outside of the immediate project area, the reduction would be approximately 2,000 VMT/day from other sources, such as a decrease in trips to neighborhood services that can be reached by walking or with a bicycle. However, if it is assumed that some trips between the project area and other nearby communities would be reduced as well, the estimated reduction could reach up to 12,000 VMT/day. For this analysis a reasonable, moderate approach was taken, whereby it was assumed that project features would reduce trips that stay within the immediate project vicinity as well as trips between the project area and as far away as the Wye. With this moderate assumption, the proposed project would be reasonably anticipated to result in an approximately 7,500 VMT/day reduction.

Based on this supplemental VMT analysis, the project would result in essentially no net change or a slight reduction in VMT, which affirms the findings of the broader regional-scale analysis. This would be due largely to the combination of project features and land use changes that would allow residents to reside close to their place of employment and would encourage visitors to the project area to park once and to use transit, bicycle, or to walk to a variety of services that are available in a centralized area (i.e., town center).

Thus, even with this sub-area VMT analysis, the analysis conclusions are unchanged and there is no basis to make an additional determination of significance.

### **The RTP/SCS's List of Projects**

Some commenters suggest that the RTP/SCS includes ambitious or aspirational projects that are not guaranteed to be completed. An example of an aspiration project cited is TTD's proposed cross-lake passenger ferry project.

Each 2012 RTP/SCS EIR/EIS alternative included a list of one of three groups of transportation projects and roadway-related water quality projects (Transportation Strategy Packages A, B, or C) that constitute the projects intended to implement the adopted goals, policies, and programs. These transportation strategy packages consist of various projects from the fiscally constrained and unconstrained project lists. The federal transportation bill Moving Ahead for Progress in the 21st Century (MAP-21) (23 CFR

450.322[f][10][i]) requires that the RTP/SCS be fiscally constrained, meaning that the costs of projects planned in the RTP/SCS must be implementable with “reasonably foreseeable” revenues during the plan’s timeframe. Under California state law, the Region’s strategy for meeting greenhouse gas reduction targets must also be fiscally constrained. In addition to addressing projected available funds and projected costs of constrained projects, the RTP/SCS can also “include recommendations for additional financing strategies” to inform an “unconstrained” list of projects, should additional funding be available in either the short or long term. This would allow for projects to be considered and implemented as funding becomes available.

The cross-lake ferry project raised as an example by the commenter is one of TTD’s near-term capital improvement projects. In 2017, TTD received grant funding from FHWA through the Congestion Mitigation Air Quality (CMAQ) program to continue work on this north-to-south shore public passenger ferry. Although this funding is no longer available in the Tahoe Basin, TTD is currently working to obtain fundings to replace funding from the CMAQ program. Work to date has involved preliminary engineering, site analyses, and scoping for environmental review.

Because the underlying legislation that is the basis for the RTP/SCS requires that the list of projects be reasonably foreseeable and implemented within the plan’s timeframe, the projects identified in the RTP/SCS are not aspirational as suggested in some comments.

After consideration of public comments on the VMT analysis, including the literature cited in comments, TTD, TRPA, and FHWA consider the VMT analysis presented in the Draft EIR/EIS/EIS to be reasonable and the conclusions are sufficient to adequately inform decision-makers about the VMT effects resulting from implementation of the project alternatives. No changes to the document are required.

### **Notice of Tiering from 2012 RTP/SCS EIR/EIS**

The US 50 project is a “later activity” that is “within the scope” of the RTP/SCS and its Program EIR, consistent with the provisions of Section 15168 of the State CEQA Guidelines, as described above. The project is not being “tiered” from the RTP/SCS EIR, as described in Section 15152 of the State CEQA Guidelines. Therefore, Section 15152(g) regarding a statement that the lead agency is using tiering does not apply.

## **MASTER RESPONSE 2: EFFECTS ON ACCESS TO TAHOE MEADOWS HISTORIC DISTRICT**

Several comments received pertain to the impact of the realignment alternatives (Alternatives B, C, and D) on access to Tahoe Meadows Historic District and related impacts on the Linear Park. This master response aggregates and responds to common elements of this topic that have been noted in multiple comments. To provide a comprehensive approach to these comments, this response addresses the following topics raised in them:

- ▲ limiting left-in/left-out turns to and from Tahoe Meadows onto US 50 from Lake Road would create a traffic hazard;
- ▲ vehicles entering and exiting Tahoe Meadows at the US 50/Lake Road intersection make heavy use of the left-in/left-out center turn lane on US 50 during summer months;
- ▲ removing the existing left-in/left-out opportunity may require vehicles to make a U-turn at the US 50/Pioneer Trail intersection, the US 50/Wildwood Avenue intersection, or a mid-block location. Commenters contend that Impact 3.6-2 of the Draft EIR/EIS/EIS should include impacts to LOS associated with Tahoe Meadows residents and guests making U-turns at these locations; these commenters also suggest that the need to make longer trips to facilitate U-turns could increase VMT;
- ▲ the Draft EIR/EIS/EIS does not consider the safety of Tahoe Meadows residents, guests, and Linear Park pedestrian and bicyclists related to the highway improvements and right-of-way needs associated with the realignment alternatives;



- ▲ realignment of the Linear Park near the main entrance to the Tahoe Meadows community at Lake Road and US 50 would create a traffic impact;
- ▲ reducing the width of the Linear Park would degrade the recreation user experience of the Linear Park and bicyclists would be uncomfortable having to ride closer to the fence. The commenters assert that the EIR/EIS/EIS must analyze and present design solutions for the intersection of US 50 and Lake Road to minimize the interaction of vehicles and users of the Linear Park;
- ▲ some commenters disagree with the conclusion of Impact 3.3-4 of the Draft EIR/EIS/EIS that the recreation user experience at the Linear Park would not be degraded because the changes to the Linear Park would create significant hazards to users of the park;
- ▲ changes to the width of the Linear Park at the entrance gate to Tahoe Meadows would cause vehicles to queue and back up onto US 50 while vehicles wait for the cars ahead of them to get through the keypad access, creating rear-end collision hazard and safety impact;
- ▲ the proposed changes to the Linear Park that reduce the separation distance between the Linear Park shared-use path and the Tahoe Meadows fence to substandard widths would degrade the facility to below Class I bicycle facility minimums and would adversely affect the safety and experience of recreational users;
- ▲ narrowing the Linear Park would be a “breach of faith,” because the land for the Linear Park was acquired from Tahoe Meadows owners by an eminent domain process;
- ▲ TTD should install a traffic signal at the US 50/Lake Road intersection that is activated on demand to allow for safe ingress to and egress from Tahoe Meadows;
- ▲ emergency vehicle access (and access for neighborhood evacuation in the event of an emergency) at the intersection of US 50 and Lodge Road must be continuously maintained throughout construction of any improvements (including construction staging), at opening in 2020, throughout construction of replacement housing near this location, and in 2040. The commenters note that Exhibits 2-2, 2-3, and 2-4 of the Draft EIR/EIS/EIS show a construction staging area directly in front of the emergency vehicle access at US 50 and Lodge Road and, for Alternative D, access is only provided to the Holiday Inn Express;
- ▲ maintain access for residents to the pedestrian gate at Lodge Road; and
- ▲ development of mixed-use development Site 1 for Alternatives B and C would block the connection between Lodge Road and US 50; it is also unclear whether Alternative D maintains connections between Lodge Road and US 50.

### **Project Refinements Related to Access to Tahoe Meadows Historic District and the Linear Park**

As described under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS, since the initiation of public review of the Draft EIR/EIS/EIS, TTD has continued to refine details of the locally preferred action (Alternative B) in response to public input, ongoing agency discussions, and continuing concept planning.

With respect to access to Tahoe Meadows and the Linear Park, TTD met with representatives of Tahoe Meadows on several occasions to discuss their concerns. On June 23, 2017, TTD and its project design engineers presented refined drawings that minimize impacts on the Tahoe Meadows entrance, retain the left-in/left-out turn option for Lake Road, and minimize impacts on the Linear Park. These refinements are described under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” and illustrated in Exhibits 2-1 and 2-2 of this Final EIR/EIS/EIS. The refinements demonstrate the distance from the main entrance gate of Tahoe Meadows to the edge of curb of the reconfigured US 50 would not be shortened more than 3 feet, which would minimize the effect on vehicle

queuing at the entrance to Tahoe Meadows and the encroachment on the Linear Park. With these refinements, an approximately 100-foot section of the Linear Park in a location where the path meanders toward US 50 would be moved up to 4 feet closer to the Tahoe Meadows fence, while maintaining a minimum 5-foot separation from US 50. The separation between the shared-use path and the fence at this location would be greater than the existing separation distances in other locations along the Linear Park. While the width of the Linear Park would be reduced by 4 feet in this location, the width of the existing shared-use path would be retained at 8 feet. These refinements would require acquisition of 0.03 acre (about 1,300 square feet). The refinements would also apply to Alternatives C and D.

The refinements address comments related to retaining left-in/left-turn access to and from Tahoe Meadows onto US 50 from Lake Road and resolve the need for Tahoe Meadows residents and guests to make U-turns at the US 50/Pioneer Trail intersection, the US 50/Wildwood Avenue intersection, or a mid-block location and concerns related to LOS at these intersections. The refinements also eliminate the need to consider additional VMT related to U-turn movements and for a traffic signal at the US 50/Lake Road intersection, as suggested by some commenters.

### **Project Effects on Vehicle Queuing at the US 50/Lake Road Intersection**

The commenters assert that there are an estimated 36,000 total vehicles trips entering and exiting the Tahoe Meadows entrance gate on Lake Road during the peak summer season that was not analyzed in the Draft EIR/EIS/EIS.

The analysis of queuing of vehicles entering and exiting the Tahoe Meadows neighborhood at the US 50/Lake Road intersection has been updated to reflect the refined design in the revised *US 50/South Shore Community Revitalization (Stateline) Project – Caltrans Project Report Traffic Operations Analysis* (see page 45 in Appendix B of this Final EIR/EIS/EIS). Additional Synchro analysis was performed at the US 50/Lake Road intersection, located approximately 1,100 feet west of the existing US 50/Pioneer Trail intersection. Lake Road serves as the gated access point to the Tahoe Meadows neighborhood, which was conservatively assumed to contain 110 single-family homes based on aerial photographs. Using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9<sup>th</sup> Edition trip generation rates, the Tahoe Meadows neighborhood generates an estimated 1,146 daily trips (or with a total of 114 p.m. peak-hour trips [72 trips entering and 42 trips exiting]) or approximately 103,140 vehicle trips during a three-month period. Queueing at the US 50/Lake Road intersection was analyzed for all alternatives considered in the EIR/EIS/EIS under Existing, Year 2020, and Year 2040 annual average and summer peak conditions. With all of the alternatives, the US 50/Lake Road intersection would retain its current configuration with left-in/left-out turns allowed with use of the existing two-way left-turn median lane. The entrance gate on Lake Road, set back approximately 45 feet minimum from the westbound US 50 edge-of-traveled way under Alternatives B, C, and D, was modeled using a typical gate-opening cycle length. With the entrance gate in place, average queues entering Tahoe Meadows were projected to be one vehicle (or 25 feet) or less with occasional peak hour 95<sup>th</sup> percentile queues reaching two vehicles (or 50 feet). Additionally, 95<sup>th</sup> percentile eastbound and southbound queue lengths of one vehicle (or 25 feet) are projected at the intersection under all alternatives and study conditions such that the realignment alternatives would not substantially change vehicle queuing at this location.

### **Effects on the Linear Park**

The realignment alternatives would affect a 280-foot section of the Linear Park. As described above and under the header “Project Refinements to Alternative B,” in Section 2.4.2 of this Final EIR/EIS/EIS, a 100-foot section of the Linear Park that meanders toward US 50 would be moved up to 4 feet closer to the Tahoe Meadows fence, while maintaining a minimum 5-foot separation from US 50. The separation between the shared-use path and the fence would be greater than the existing separation distances in other locations along the Linear Park and would not affect the recreation user experience of pedestrians and bicyclists using the path. While the width of the Linear Park would be reduced by 4 feet, the width of the existing shared-use path would be retained at 8 feet, which would continue to meet the minimum paved width of a travel way for a Class I bicycle path (Caltrans 2017: 1000-4). The existing stop signs along both sides of the path at the Lake Road crossing would be retained to minimize conflicts between path users and vehicles entering and existing the

Tahoe Meadows community. Therefore, users of the Linear Park would not be exposed to significant hazards as suggested in some comments.

Comments related to the narrowing of Linear Park being a “breach of faith” do not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS. These comments are noted for consideration by decision makers.

### **Access to Lodge Road**

Several commenters state that uninterrupted emergency access on Lodge Road must be maintained throughout the life of the project (i.e., construction, at project opening, and through to buildout) and question whether the development of mixed-use development Site 1 with Alternatives B, C, and D would maintain the connection between Lodge Road and US 50.

As described in the last sentence of the second full paragraph on page 3.4-23 in Section 3.4, “Community Impacts,” of the Draft EIR/EIS/EIS, the “emergency access to Tahoe Meadows on Lodge Road and access to the Holiday Inn Express would be maintained.” If Alternatives B or C were approved, then access would be provided through Site 1, as stated on page 3.4-19 of the Draft EIR/EIS/EIS. Access to Lodge Road for these alternatives would be from US 50. If Alternative D were approved, the access would be provided through the remaining right-of-way (ROW) adjacent to US 50. In either case, access to Lodge Road would be incorporated into the final design plans to be completed subsequent to project approval.

Page 2-42 of the Draft EIR/EIS/EIS describes potential construction staging areas to be used to store project-related construction equipment and materials. For Alternatives B and C, one of the potential construction staging areas identified includes the existing US 50 right-of-way abandoned after the construction of realigned US 50, which would be used during construction of the tourist core improvements only. Exhibits 2-2 and 2-3 in the Draft EIR/EIS/EIS show the conceptual layout of this staging area. Emergency access to Lodge Road would be maintained at all times during construction.

With respect to non-emergency access to Lodge Road, access to the pedestrian gate would be maintained with the realignment alternatives. It is understood that a small number of Tahoe Meadows residents (located within the northeastern portion of the community) may use the Lodge Road gate for vehicle access purposes. With Alternative D, the US 50/Lodge Road intersection would be very close to the US 50/Pioneer Trail intersection, so access for private vehicles may be limited to right-in/right-out turns only, depending on what would be permitted by Caltrans. Because there would not be a center median at this location, emergency vehicles would be able to make left-turns in and out at this intersection to the extent they are able to control traffic and safely execute a turn. Because the location of the US 50/Pioneer Trail intersection is further away from the US 50/Lodge Road intersection with Alternatives B and C, it may be possible to retain left-in/left-out access to this intersection during final design.

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## Agencies



### United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
333 Bush Street, Suite 515  
San Francisco, California, 94104

Letter  
1

IN REPLY REFER TO:  
(ER 17/0218)

*Filed Electronically*

July 5, 2017

Russ Nygaard  
Tahoe Transportation District  
PO Box 499  
Zephyr Cove, NV 89448  
[info@tahoetransportation.org](mailto:info@tahoetransportation.org)

Subject: Draft Environmental Impact Statement (EIS) and Section 4(f) Analysis US 50  
Realignment and South Shore Community Revitalization Project, City of South Lake Tahoe, CA  
to Stateline, NV

Dear Mr. Nygaard:

The Department of the Interior has no comments on Draft Environmental Impact Statement  
(EIS) and Section 4(f) Analysis US 50 Realignment and South Shore Community Revitalization  
Project, City of South Lake Tahoe, CA to Stateline, NV.

1-1

Thank you for the opportunity to review this project. If you have any questions, please call me  
at (415) 296-3355.

Sincerely,

Janet L. Whitlock  
Regional Environmental Officer

Cc:  
Carol Braegelmann, DOI, OEPC  
Alan Schmierer, NPS  
Michael Norris, USGS  
Ellen McBride, FWS  
Brownyn Hogan, FWS  
John Rydzik, BIA

Letter  
1

U.S. Department of the Interior  
July 5, 2017

- 1-1 The commenter states that the Department of Interior has no comments on the Draft EIR/EIS/EIS and Section 4(f) analysis. The comment is noted for consideration by decision makers.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

June 30, 2017

Scott McHenry  
Local Programs Manager, Project Delivery Team  
Federal Highway Administration  
650 Capitol Mall, Suite 4-100  
Sacramento, CA 95814

Subject: Draft Environmental Impact Statement for the US 50/South Shore Community Revitalization Project, El Dorado County, California and Douglas County, Nevada (CEQ #20170071)

Dear Mr. McHenry:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

EPA supports the project's goals of advancing multi-modal transportation opportunities and improving vehicle, pedestrian, and bicycle safety, while addressing affordable housing, community revitalization, and mobility needs, and improving the environmental quality of the area. We understand that the Tahoe Transportation District has designated Alternative B as the "locally preferred action," because TTD believes it best meets the objectives of the project and it emerged as the most supported alternative following public scoping. The document states that this alternative would result in impacts to community character and cohesion, substantial noise increases, and visual effects on the Rocky Point neighborhood. Alternative B would also have a disproportionately high and adverse effect on minority and low-income populations in the Rocky Point neighborhood.

Due to these impacts, and a need to provide more information about impacts to wetlands and waters, we have rated this document EC-2, *Environmental Concerns, Insufficient Information*. Please see the attached *Rating Factors* for a description of our rating system. We have included recommendations for the remainder of the environmental review process and subsequent design and construction in our enclosed comments.

We appreciate the opportunity to review this Draft EIS. When the Final EIS is released for public review, please send one hard copy and one electronic copy to the address above (mail code: ENF-4-2).

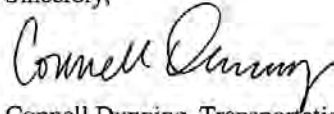
Letter  
2

2-1

If you have any questions, please contact me at 415-947-4161; dunning.connell@epa.gov, or Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554; mulvihill.carolyn@epa.gov.

2-1  
cont.

Sincerely,



Connell Dunning, Transportation Team Supervisor  
Environmental Review Section

Enclosures:

Summary of EPA Rating Definitions  
EPA's Detailed Comments

Cc via email: Russ Nygaard, Tahoe Transportation District  
Abdelmoez A. Abdalla, FHWA Nevada Division  
Steve M. Cooke, Nevada Department of Transportation  
Shannon Friedman, Tahoe Regional Planning Agency  
John Holder, Caltrans District 3  
Dave Johnston, El Dorado County Air Quality Management District  
Jennifer Carr, Nevada Division of Environmental Protection  
Aaron Park, Army Corps of Engineers  
Patty Kouyoumdjin, Lahontan Regional Water Quality Control Board

### SUMMARY OF EPA RATING DEFINITIONS\*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

#### ENVIRONMENTAL IMPACT OF THE ACTION

##### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

##### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

##### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

##### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

#### ADEQUACY OF THE IMPACT STATEMENT

##### *"Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

##### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

##### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

2-2



**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE US 50/SOUTH SHORE COMMUNITY REVITALIZATION PROJECT, JUNE 28, 2017**

**Wetlands and Water Quality**

The Draft Environmental Impact Statement (Draft EIS) states that a preliminary delineation of potential wetlands and other waters of the United States was conducted in 2010 and 2011. This delineation identified several potential wetlands and other waters of the United States within the project site, but was not verified by the U.S. Army Corps of Engineers (USACE). Because the delineation was completed more than 5 years before project construction, it is considered expired, and will need to be repeated prior to permit application and approval. EPA recommends that the new delineation be completed and verified by the USACE prior to publication of the Final Environmental Impact Statement (Final EIS). The Federal Highway Administration (FHWA) and Tahoe Transportation District (TTD) should also coordinate with USACE and EPA to determine appropriate mitigation for wetland impacts, including indirect impacts.

2-3

The DEIS states that improvements to stormwater runoff collection and treatment facilities are needed to meet Tahoe Regional Planning Agency (TRPA), Nevada Division of Environmental Protection, and Lahontan Regional Water Quality Control Board regulations and requirements for protecting the water quality and clarity of Lake Tahoe. EPA strongly supports the proposal to include stormwater improvements as a part of this project to increase stormwater treatment and management capacity and prevent discharges to local water bodies. The project design team identified several measures that would enhance the ability of existing systems to protect water quality, and would create water quality benefits through the capture of currently untreated stormwater runoff. As stated in the Draft EIS, these improvements would resolve preexisting detrimental conditions within the project site and add supplemental capacity to water quality treatment basins above required volumes.

**Recommendations:**

- Complete and verify the wetland delineation prior to publication of the Final EIS. Document coordination with the USACE and EPA on the extent of direct and indirect impacts to wetlands and other waters of the United States and proposed mitigation in the Final EIS.
- Commit to the stormwater improvements discussed in the Draft EIS, in the Final EIS and Record of Decision.
- Integrate "green infrastructure" into project design where feasible for stormwater management and treatment, and identify specific design commitments in the Final EIS.
- Maintain natural washes (in their present location and natural form) and install earthen-bottomed culverts where needed, instead of concrete-lined culverts, to protect water quality, support natural hydrology and improve flood control. Identify in the Final EIS where natural washes and earthen-bottomed culverts were considered and are being implemented.

2-4

**Air Quality**

The Draft EIS states that construction of Alternatives B, C, and D would exceed El Dorado County Air Quality Management District (EDCAQMD)'s NO<sub>x</sub> threshold, and CO, exhaust PM<sub>10</sub>, and PM<sub>2.5</sub> emissions could be significant and result in exceedances of air quality standards. All build alternatives (Alternatives B through E) could also result in excessive fugitive dust emissions.

2-5

EPA appreciates the various commitments to minimize these potential emissions that are included in the Draft EIS, including 1) submitting NOx emission reduction estimates to EDCAQMD prior to approval of grading permits; 2) committing to specific NOx reduction goals through use of Tier 3 and tier 4 engines and other measures; and 3) implementing fugitive dust controls identified in the El Dorado County Air Pollution Control District CEQA Guide (2002)

2-5  
cont.

**Recommendation:**

- Include the minimization and mitigations measures identified above (and included in the Draft EIS) as commitments in the Final EIS and Record of Decision and provided updated information related to construction phasing/timing if reduction of cumulative air quality impacts could be achieved through staggered scheduling of various construction components proposed.

**Environmental Justice**

The Draft EIS states that the project alternatives would displace between 68 and 72 residential units and four to seven businesses, depending on the specific alternative, and that the highway realignment and physical division of the Rocky Point neighborhood would change the character and cohesiveness of the neighborhood by displacing residents and substantially changing the visual character and ambient noise environment. It also states that the neighborhood has a higher proportion of population that is minority and below the poverty level, compared to the general populations of the city, county, and Stateline Census-Designated Place (CDP).

As discussed in the Draft EIS, the physical division of the Rocky Point neighborhood associated with the new US 50 alignment and associated changes in visual character and noise resulting from Alternatives B, C, and D transportation improvements would remain after incorporation of feasible mitigation measures. The alternatives' adverse effects on community character in this neighborhood would remain a disproportionate and unavoidable adverse effect on a low-income, minority area.

The Draft EIS also states that with implementation of mitigation, the realigned US 50 would be designed in accordance with all applicable design standards and guidelines and thus would exhibit a high level of visual quality, but would still substantially alter neighborhood character. The addition of noise barriers could also contribute to the change in visual character. While it would not be feasible to reduce the magnitude of the visual impact, we commend commitments to mitigation of visual impacts and encourage FHWA and TTD to implement all feasible measures.

2-6

**Recommendations:**

- We encourage continued outreach to the impacted community through the remainder of project planning and development, including the previous methods of door-to-door interviews with residents, community meetings in community center locations, and translation services.
- We encourage FHWA and TTD to continue to seek opportunities to minimize and mitigate community impacts through community enhancement projects for the Rocky Point neighborhood, such as community facilities or community beautification projects, and encourage other landscaping and aesthetic treatments for impacted communities as determined through coordination with the communities.
- Include in the Final EIS and Record of Decision the commitment to construct replacement housing (including deed-restricted affordable and deed-restricted moderate-income housing, equal to or greater than the number of housing units displaced) prior to relocating owner and

tenant residents and prior to construction of transportation improvements, so that residents displaced by the project may be relocated to the newly constructed housing if they so choose as early as possible.

2-6  
cont.

#### **Noise Impacts**

The Draft EIS states that with Alternatives B, C, D, and E, multiple noise-sensitive receptors would be exposed to traffic noise levels that exceed traffic noise standard established by various agencies. The Draft EIS includes mitigation measures that require implementation of specific performance requirements and could include additional noise-reduction features, such as use of rubberized hot-mix asphalt or outdoor sound barriers. The selection and design of specific traffic noise reduction measures are to be supported by a site-specific mitigation assessment conducted by a qualified acoustical engineer or consultant selected and funded by the project proponent. These measures would effectively reduce traffic noise, but the document states that it would not be feasible to reduce traffic noise to below traffic noise levels considered significant by Caltrans and TRPA.

Considering the magnitude of the impacts, EPA encourages the implementation of all feasible mitigation measures. The Draft EIS states that the Noise Abatement Decision Report determined that the estimated cost of constructing sound barriers to protect residential units from exposure to traffic noise levels that exceed applicable NEPA criteria would not be reasonable relative to the allowance of money per benefited residence for traffic noise abatement. If funding for a sound barrier is not available from FHWA or Caltrans, the Draft EIS states that funding could be provided by TTD or other agencies.

2-7

#### **Recommendations:**

- EPA strongly encourages FHWA and TTD to implement noise mitigation, including sound barriers, even if they have been determined to not be reasonable due to cost by FHWA or Caltrans. We encourage mitigation of any significant noise impacts in environmental justice communities and encourage FHWA and TTD to consider other factors such as disproportionate impacts to environmental justice communities when determining cost-effectiveness of noise barrier.

**Letter  
2****U.S. Environmental Protection Agency**  
June 5, 2017

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- 2-1 The commenter provides introductory text summarizing Draft EIR/EIS/EIS findings and describes that the document includes insufficient information about impacts to wetlands and waters of the U.S. Specific resource concerns are addressed in Comments 2-3 through 2-7 below.
- 2-2 The comment includes a summary page that identifies the U.S. Environmental Protection Agency's (EPA) comment rating definitions used when reviewing environmental documents, including the Draft EIR/EIS/EIS. The comment is acknowledged.
- 2-3 This commenter states that the wetland delineation completed for the project is considered expired and a new delineation will be required prior to project approval. This statement is correct. A new delineation was completed in 2017 and submitted to the U.S. Army Corps of Engineers (USACE) for verification in March 2018. A preliminary jurisdictional determination was issued by USACE concurring with the findings of the wetland delineation on May 22, 2018 (see Appendix R).
- 2-4 The commenter states their support for the stormwater improvements included in the proposed project and recommends that the project proponent, TTD, commit to these improvements in the Final EIR/EIS/EIS. The commenter also recommends that a wetland delineation be completed and verified prior to publication of the Final EIR/EIS/EIS. As described in the Response to Comment 2-3, a delineation of wetlands and aquatic resources was completed for the project in 2017, submitted to the USACE for verification in March 2018, and verified on May 22, 2018 (see Appendix R). This delineation would be used to minimize impacts to aquatic resources in the final design of the preferred alternative. Changes related to the latest wetland delineation prepared for the project are presented in Chapter 3, "Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures," of this Final EIR/EIS/EIS. These updates do not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the last paragraph on page 3.16-14 in Section 3.16, "Biological Environment," of the Draft EIR/EIS/EIS has been revised as follows:

Construction associated with Alternatives B, C, and D would result in permanent loss or temporary disturbance of montane riparian and montane meadow habitats, which are considered sensitive. Additionally, the wetland and aquatic resources delineation prepared for the project (Ascent Environmental 2018) identified ten wetlands and two jurisdictional "other waters" within the project site. Table 3.16-3 summarizes and compares the acreage of sensitive habitats present and affected on a permanent and temporary basis for each realignment alternative. ~~Additionally, the NES for the project (TTD 2015) identified several potential wetlands and other waters of the United States within the project site, based on a preliminary wetland delineation conducted in 2010 and 2011. This preliminary delineation of potential wetlands and other waters of the United States has not been verified by the USACE and will need to be updated prior to permit application and approval. Most of these areas are included within the montane riparian and montane meadow habitat types mapped and quantified in the project site.~~

Also, Table 3.16-3 on page 3.16-15 in Section 3.16, “Biological Environment,” of the Draft EIR/EIS/EIS has been revised to incorporate information from the wetland delineation as follows:

**Table 3.16-3 Acreage of Permanent and Temporary Effects on Sensitive Habitats**

Sensitive Habitat Type	Alternative B		Alternative C		Alternative D		Alternative E	
	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp
<u>Jurisdictional Waters</u>	<u>0.03</u>	<u>0.01</u>	<u>0.04</u>	<u>0.02</u>	<u>0.03</u>	<u>0.001</u>	<u>0.00</u>	<u>0.00</u>
Montane Riparian	<del>0.4</del> <u>0.38</u>	<del>0.5</del> <u>0.38</u>	<u>0.11</u>	<del>1.0</del> <u>0.82</u>	<del>0.4</del> <u>0.38</u>	<del>0.5</del> <u>0.39</u>	0.00	0.00
Montane Meadow	<del>1.2</del> <u>1.19</u>	<del>1.1</del> <u>0.97</u>	<u>0.22</u>	<del>0.9</del> <u>0.82</u>	<u>1.20</u>	<del>1.2</del> <u>1.05</u>	0.00	0.00
<u>Jurisdictional Wetlands</u>	<u>0.06</u>	<u>0.16</u>	<u>0.02</u>	<u>0.19</u>	<u>0.06</u>	<u>0.16</u>	<u>0.00</u>	<u>0.00</u>
<b>Total</b>	<b><u>1.66</u></b>	<b><del>1.6</del><u>1.52</u></b>	<b><u>0.39</u></b>	<b><del>1.9</del><u>1.85</u></b>	<b><u>1.67</u></b>	<b><del>1.5</del><u>1.60</u></b>	<b>0.00</b>	<b>0.00</b>

Source: Data compiled by Ascent Environmental Inc. in ~~2014~~2018

Additionally, the project proponent, TTD, has committed to the stormwater improvements described in the Draft EIR/EIS/EIS by including these features in the project description and environmental analysis. Although these features may be refined during final design based on site-specific conditions, their implementation is essential to the project and the environmental conclusions of the EIR/EIS/EIS.

Finally, the commenter asks that the Final EIR/EIS/EIS identify where earthen-bottomed culverts would be used in the project. The project would maintain the existing earthen-bottomed culvert for Edgewood Creek.

2-5

The commenter summarizes conclusions regarding construction-related criteria air pollutant emissions, requests that the minimization and mitigation measures identified in the Draft EIR/EIS/EIS be identified as commitments in the Final EIR/EIS/EIS and Record of Decision, and requests consideration as to whether staggering various construction activities would reduce cumulative air quality impacts.

The modeling conducted for the Draft EIR/EIS/EIS (described on page 3.13-16) conservatively assumed that project construction/grading phases could begin as early as 2017 with final project completion for transportation improvements occurring by 2020. Given that project approval will not be considered until 2018, 2019 is the soonest year in which project construction could occur. The modeling of construction emissions in the Draft EIR/EIS/EIS is conservative in that construction emissions in later years would be lower because pollutant emissions from construction vehicles would gradually decrease over time with improvements in emissions control technology and cleaner fuels.

The potential redevelopment of the mixed-use development sites was conservatively assumed to occur simultaneously with the transportation improvements to evaluate a reasonably foreseeable, conservative scenario to avoid understating potential emissions impacts. To model a reasonably foreseeable, conservative scenario for construction emissions from the mixed-use sites, it was conservatively assumed that two of the three sites could be constructed simultaneously. These assumptions regarding overlapping construction phasing are conservative. In the context of environmental impact analysis in this document,

“conservative” is intended to mean avoiding the risk if understating an adverse impact. The Draft EIR/EIS/EIS found that construction-related emissions would not result in a significant short-term impact to air quality with implementation of Mitigation Measures 3.13-1a and 3.13-1b and would not combine with construction emissions of other foreseeable projects such that a cumulatively considerable impact would occur. Staggering project construction activities to minimize overlap could further reduce emissions; however, such measures are not necessary given that construction-related emissions would be sufficiently reduced to a less-than-significant/not adverse level with measures that are proposed in the EIR/EIS/EIS.

- 2-6 The commenter summarizes impacts related to environmental justice and encourages continued community outreach throughout planning and development for the project and additional minimization and mitigation through community enhancement and other aesthetic treatment projects. The commenter also recommends including the commitment to construct replacement housing prior to relocating owner and tenant residents and prior to construction of transportation improvements. TTD’s commitment to constructing replacement housing (i.e., 76 dwelling units) prior to groundbreaking activities for transportation improvements in California are described in Section 2.3.1, “Replacement Housing,” of this Final EIR/EIS/EIS. As described under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS, project refinements to Alternative B have been made to address community character and safety elements in the Rocky Point neighborhood, such as a community park and street lighting. The comment is noted for consideration by decision makers.
- 2-7 The commenter summarizes the Draft EIR/EIS/EIS findings related to noise impacts and states that EPA strongly encourages FHWA and TTD to implement noise mitigation, including sound barriers, even if they have been determined to not be reasonable by FHWA or Caltrans because of the cost. As discussed for Mitigation Measures 3.15-3a, 3.15-3b, and 3.15-3c, if funding for a sound barrier is not available from FHWA or Caltrans, then funding could be provided by TTD or other agencies (see pages 3.15-66, 3.15-68, and 3.15-70 of the Draft EIR/EIS/EIS). The comment is noted for consideration by decision makers.

**Jessica Mitchell**

**Letter  
3**

**From:** Stewart, Penny@Tahoe <Penny.Stewart@tahoe.ca.gov>  
**Sent:** Friday, July 07, 2017 4:53 PM  
**To:** 'info@tahoetransportation.org'  
**Subject:** CTC US 50 Draft EIR/EIS/EIS comments  
**Attachments:** us50 comments\_07-07-17\_001.pdf

-----Original Message-----

From: Stewart, Penny@Tahoe  
 Sent: Friday, July 07, 2017 4:42 PM  
 To: rnygaard@tahoetransportation.org  
 Cc: 'Dana Dapolito' <ddapolito@parks.nv.gov>  
 Subject: US 50 Draft EIR/EIS/EIS comments

Russ -

Please find the comment letter from NDSP and the Conservancy. We appreciate the opportunity to comment and the partnership we have enjoyed to date.

I wanted to let you know that when I read the document, I realized that our "Rocky Point" grant funded project area was substantially larger than just the Rocky Point Stormwater system described in the document. You will note the comment associated with the need to expand the mitigation measure based on the area funded.

3-1

Feel free to call me if you have any questions -

Penny

Penny Stewart, PE  
 Resources and Public Access Program Manager California Tahoe Conservancy  
 1061 Third Street  
 South Lake Tahoe, CA 96150  
 (530) 543-6013 (office)  
 (530) 307-0024 (mobile)  
 (530) 542-5567 (fax)  
 Penny.Stewart@tahoe.ca.gov

Every Californian should conserve water. Find out how at:  
[SaveOurWater.com](http://SaveOurWater.com) • [Drought.CA.gov](http://Drought.CA.gov)



July 7, 2017

Mr. Russell Nygaard, P.E.  
Transportation Capital Program Manager  
Tahoe Transportation District  
P.O. Box 499  
Zephyr Cove, NV 89448

**RE: Draft EIR/EIS/EIS - US 50/South Shore Community  
Revitalization Project**

**BOARD MEMBERS**

**LARRY SEVISON, Chair**  
*Placer County*

**JOHN HOOPER, Vice Chair**  
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**LYNN SUTER**  
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**TODD FERRARA**  
*Natural Resources Agency*

**KAREN FINN**  
*Department of Finance*

**TOM DAVIS**  
*City of South Lake Tahoe*

**SUE NOVASEL**  
*El Dorado County*

**JEFF MARSOLAIS**  
*U.S. Forest Service (ex-officio)*

**PATRICK WRIGHT**  
*Executive Director*

Dear Mr. Nygaard,

Thank you for the opportunity to comment on the Draft EIR/EIS/EIS for the US 50/South Shore Community Revitalization Project (Project). Our comments are focused primarily on the screencheck draft Appendix D, 4(f) DeMinimis Finding, available on your website. We submit this letter as a joint response from Nevada Division of State Parks (NDSP) and the California Tahoe Conservancy (Conservancy).

There are discrepancies between the location of the pathway between the pedestrian overpass to the Park entrance shown in Exhibits 2-2 through 2-4 of the Draft EIR/EIS/EIS and the Key Plan shown in Attachment 2 of Appendix D. We believe the January 21, 2016 meeting minutes indicate that the Key Plan illustrates the pathway location that was agreed upon by the parties to minimize impacts to the Park. The recent construction of the Gondola Vista development has changed the current conditions of the area and no longer allows the pathway location agreed upon by the parties and evaluated in Appendix D.

The Gondola Vista development may also modify other elements, such as tiered retaining walls, that were agreed upon to minimize impacts to the Park and its entrance. Without an understanding of how the Tahoe Transportation District will address changes to these elements caused by the Gondola Vista Project, it is difficult for us to determine whether the Project will still minimize impacts to the Park. We welcome the opportunity to meet and understand how you plan to address the mitigation and minimization elements impacted by the changed site conditions in the Gondola Vista area.

Page 3.10-14, along with other locations in Section 3.10, incorrectly state that the Conservancy acquired properties for the Rocky Point Stormwater System. The Conservancy provided grant funds to the City of South Lake Tahoe (CSLT) for the purchase of properties and easements associated with

3-2

3-3

1061 Third Street, South Lake Tahoe, California 96150  
530-542-5580 fax: 530-542-5567 e-mail: [info@tahoe.ca.gov](mailto:info@tahoe.ca.gov) web: [www.tahoe.ca.gov](http://www.tahoe.ca.gov)




the Fern Road Basins, the Rocky Point Stormwater System, and the Pine Boulevard Stormwater System. In addition, the Conservancy provided grant funds to the CSLT for the construction of improvements associated with these stormwater systems. Changes in the use of real property interests acquired or improvements constructed using these grant funds may require mitigation or repayment of the grant funds. Given this, Mitigation Measure 3.10-3 should be expanded to include all Conservancy grant funded acquisitions and improvements associated with CSLT stormwater systems.

3-3  
cont.

Thank you again for the opportunity to comment.

Sincerely,

  
Penny Stewart  
Program Manager

cc: Nevada Division of State Parks

**Letter  
3**

**California Tahoe Conservancy and Nevada Division of State Parks**  
July 7, 2017

- 3-1 The comment is an email introducing an attached comment letter from the Nevada Division of State Parks (NDSP) and the California Tahoe Conservancy (Conservancy).
- 3-2 The commenter identifies discrepancies between the proposed pedestrian bridge shown in Exhibits 2-2 through 2-4 of the Draft EIR/EIS/EIS and the Key Plan shown in Attachment 2 of Appendix D in the Draft EIR/EIS/EIS and contends that the Gondola Vista development no longer allows the pathway location agreed upon by the parties. Images depicting the sidewalk connecting the proposed pedestrian bridge to the main entrance of Van Sickle Bi-State Park were presented to NDSP and the Conservancy at a meeting on August 11, 2015. The notes from that meeting (also included in Appendix D) indicate that in preparing the Key Plan, the illustrator took artistic liberties that deviated from the plans shown in the Geometric Approval Drawings (GAD; included in Appendix B of the Draft EIR/EIS/EIS). The GAD shows the sidewalk hugging the wall and minimizing right-of-way (ROW) needs. The path as depicted would require additional ROW. The commenter is correct that the development of the Gondola Vista project would limit the ability to create a meandering path within the boundaries of the Gondola Vista property. However, portions of the path extending beyond the Gondola Vista property to the main entrance could be designed to include a meandering element through final design. (See also the discussion under the header "Project Refinements to Alternative B" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS.) The appearance and context-sensitive aesthetic treatments of the tiered retaining walls along the mountain side of realigned US 50 would be retained as an element of the project; the configuration of these walls to accommodate the driveway to the Gondola Vista property would be refined accordingly during detailed design development following environmental review. The commenters' concerns related to the path have been resolved through on-going discussions with TTD since publication of the Draft

EIR/EIS/EIS, as indicated in the Section 4(f) concurrence letter included in Chapter 5, “Consultation and Coordination,” of this Final EIR/EIS/EIS.

3-3

The commenter states that page 3.10-14 and other locations in Section 3.10, “Water Quality and Stormwater Runoff,” of the Draft EIR/EIS/EIS incorrectly characterize the Conservancy’s role in the establishment of the Rocky Point Stormwater System. The commenter also states that additional language should be added to Mitigation Measure 3.10-3. The comment is correct and the text has been revised in this final environmental document. This change is presented in Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures,” of this Final EIR/EIS/EIS. The correction does not alter the conclusions with respect to the significance of any environmental impact.

The first paragraph on page 3.10-14 of the Draft EIR/EIS/EIS is revised as follows:

Drainage from the Fern Road, Echo Road, and Moss Road area is collected via storm drains and enters two drainage basins at the Fern Road/Pioneer Trail intersection. Overflow from these basins is routed west for additional treatment in the Upper and Lower Pine basins before discharging via the North Ditch to Lake Tahoe. In addition to drainage basins, several undeveloped lots within the Fern Road area were purchased by CSLT using grant funds provided by the California Tahoe Conservancy (CTC) as part of the Rocky Point Erosion Control Project. These lots provide a natural infiltration area for runoff from adjacent impervious areas and reduce the volume of runoff that must be treated in the drainage basin system. Any development on these parcels that affects their ability to accomplish this purpose would require mitigation.

The second paragraph on page 3.10-14 of the Draft EIR/EIS/EIS is revised as follows:

Stormwater runoff from the California portion of US 50 in the tourist core is currently conveyed through a series of storm drains and drainage basins west of US 50, known as the Pine Boulevard Stormwater System or the North Ditch, before being discharged to Lake Tahoe. Flow from Stateline Creek crosses Montreal Road and enters the same storm drain system through a 42-inch reinforced concrete pipe and headwall near the southeast portion of the project site. Portions of the Pine Boulevard Stormwater System were completed using grant funds provided by the CTC.

Table 3.10-7 on page 3.10-37 of the Draft EIR/EIS/EIS is revised as follows:

**Table 3.10-7 Increase in Impervious Surfaces by Alternative**

Alternative	New Impervious Surface	Affected Storm Drain Systems
Alternative A: No Build (No Project)	NA	NA
Alternative B: Triangle	5.47 to 7.62 acres	<del>CSLT</del> Fern Road Stormwater Basins (2) <del>CTC</del> Rocky Point Stormwater Treatment Parcels: 029-331-12, 029-331-11, and 029-332-01 <del>CTC</del> Rocky Point Stormwater Easements: 029-170-05, 029-170-04, 029-351-22, 029-341-04, and 029-363-07 Existing Storm Drains: 2.5 miles

**Table 3.10-7 Increase in Impervious Surfaces by Alternative**

Alternative	New Impervious Surface	Affected Storm Drain Systems
Alternative C: Triangle One-Way	1.06 acres	CSLT Fern Road Stormwater Basins (2) CTC Rocky Point Stormwater Treatment Parcels: 029-331-12, 029-331-11, and 029-332-01 CTC Rocky Point Stormwater Easements: 029-170-05, 029-170-04, 029-351-22, 029-341-04, and 029-363-07 Existing Storm Drains: 2.1 miles
Alternative D: PSR Alternative 2	5.76 to 7.91 acres	CSLT Fern Road Stormwater Basins (2) CTC Rocky Point Stormwater Treatment Parcels: 029-331-12, 029-331-11, and 029-332-01 CTC Rocky Point Stormwater Easements: 029-170-05, 029-170-04, 029-343-17, and 029-341-04 Existing Storm Drains: 2.4 miles
Alternative E: Skywalk	NA	NA
CTC – California Tahoe Conservancy; CSLT – City of South Lake Tahoe; NA – not applicable		
Source: Wood Rodgers 2015; adapted by Ascent Environmental in 2016		

Mitigation Measure 3.10.4 on page 3.4-46 of the Draft EIR/EIS/EIS is revised as follows:

### **Mitigation Measure 3.10-3: Protect functionality of Rocky Point Existing Stormwater Improvements**

*This mitigation measure applies to Alternatives B, C, and D transportation improvements and mixed-use development, including replacement housing, for the purposes of NEPA, CEQA, and TRPA.*

The project proponent shall demonstrate that all ~~Rocky Point~~ stormwater improvements continue to meet the goals for which they were established. In the case of stormwater improvements purchased or constructed with CTC grant funds (such as the Rock Point and Fern Road systems), this includes including meeting or exceeding 6.4 pounds of sediment reduction per State of California dollar spent on site improvements. If the functionality of the ~~Rocky Point property and facilities improvements~~ cannot be maintained, the project design would be modified to replace these facilities with land and infrastructure that is at least as effective as the current facilities, or more effective. In the event that any portion of the project encroaches on the existing City of South Lake Tahoe stormwater basins at Fern Road, these basins would be reconstructed in place or replaced in-kind within available right-of-way. The net result would be the maintenance of existing stormwater facilities or the replacement of affected facilities with equivalently or more effective stormwater management land and infrastructure. The specific location and design of the replacement infrastructure would be defined during detailed design development.



EDMUND G. BROWN JR.  
GOVERNOR

June 8, 2017

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT

Letter  
4



KEN ALEX  
DIRECTOR

RECEIVED  
JUN 16 2017

Russ Nygaard  
Tahoe Transportation District  
P.O. Box 499  
Zephyr Cove, NV 89448

Subject: US 50/South Shore Community Revitalization Project  
SCH#: 2011112009

Dear Russ Nygaard:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 7, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

4-1

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

### Document Details Report State Clearinghouse Data Base

**SCH#** 2011112009  
**Project Title** US 50/South Shore Community Revitalization Project  
**Lead Agency** Tahoe Transportation District

**Type** EIR Draft EIR  
**Description** The TTD is proposing the US 50/South Shore Community Revitalization Project, which is designed to improve the Tahoe Basin's transportation network while addressing affordable housing, community revitalization, and mobility needs, and contributing to environmental gains. The project has been contemplated in regional and local planning documents for decades and is one of the region's largest capital improvements in regional and local planning documents for decades and is one of the region's largest capital improvement projects. As proposed, the project would realign US 50, enabling the creation of a pedestrian-oriented, "Main Street" through the middle of the existing tourist core, where the highway is now located. Walking, bicycling and reliable transit would be attractive and safe transportation options and community gathering places would be available in the tourist core. Commercial core revitalization is intended to increase visitor spending and catalyze, adjacent private construction investment.

#### Lead Agency Contact

**Name** Russ Nygaard  
**Agency** Tahoe Transportation District  
**Phone** 775 589-5500 **Fax**  
**email** aknotis@tahoetransportation.org  
**Address** P.O. Box 499  
**City** Zephyr Cove **State** NV **Zip** 89448

4-1  
cont.

#### Project Location

**County** El Dorado  
**City** South Lake Tahoe  
**Region**  
**Lat / Long** 38° 57' 33" N / 119° 56' 31" W  
**Cross Streets** US 50 & Lake Prkwy btwn Wildwood Ave. & SR 207  
**Parcel No.** Numerous  
**Township** **Range** **Section** **Base**

#### Proximity to:

**Highways** SR 207, US 50  
**Airports**  
**Railways**  
**Waterways** Lake Tahoe, Edgewood Crk., & Golf Course Crk.  
**Schools** Bijou ES, So. Tahoe MS  
**Land Use** Stateline/Ski Run Community Plan, and TRPA Pass 070A, 080, and 092

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual; Sewer Capacity

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 2; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3 S; Regional Water Quality Control Bd., Region 6 (So Lake Tahoe); Department of Toxic Substances Control; Native American Heritage Commission; Tahoe Regional Planning Agency

Document Details Report State Clearinghouse Data Base			
Date Received	04/24/2017	Start of Review	04/24/2017
		End of Review	06/07/2017
			4-1 cont.

**Letter**      **California State Clearinghouse**  
**4**              June 8, 2017

- 4-1      The commenter states that the State Clearinghouse submitted the Draft EIR to selected state agencies for review and received no comment letters. The commenter acknowledged that the Draft EIR process complied with the State Clearinghouse review requirements, pursuant to CEQA.

BRADLEY CROWELL  
*Director*

Department of Conservation  
and Natural Resources

CHARLES C. DONOHUE  
*Administrator*

BRIAN SANDOVAL  
*Governor*



State Land Office  
State Land Use Planning Agency  
Nevada Tahoe Resource  
Conservation Bond Program

*Address Reply*

Division of State Lands  
901 S. Stewart St. Suite 5003  
Carson City, Nevada 89701-5246  
Phone (775) 684-2720  
Fax (775) 684-2721  
Web [www.lands.nv.gov](http://www.lands.nv.gov)

**Letter  
5**

STATE OF NEVADA  
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

## Division of State Lands

June 30, 2017

Russ Nygaard  
Transportation Capital Program Manager  
TTD  
P.O. Box 499  
Zephyr Cove, NV 89448

RE: DEIS US 50 SOUTH SHORE REVITALIZATION PROJECT

Dear Mr. Nygaard,

This letter represents comments from the Nevada Division of State Lands concerning the above referenced project. The State of Nevada jointly manages the Van Sickle Bi-State Park with the California Tahoe Conservancy which is within the project area of the US 50 South Shore Revitalization project.

The preferred alternative proposes a four-lane highway adjacent to the Van Sickle Bi-State Park where a two lane road (Montreal Rd) currently exists. A private development is currently in construction on Montreal Road which abuts Van Sickle Bi-State Park. This private development was not in construction during the development of the DEIS and therefore its potential impacts to the preferred alternative design may have not been fully analyzed in the DEIS.

Although not considered or mentioned specifically in the DEIS, the State of Nevada wants to formally comment that authorizations will not be granted for access to private development through lands owned by the State of Nevada, nor does the State of Nevada support private access through Van Sickle Bi-State Park, to accommodate the preferred alternative design for the US 50.

We thank you for the opportunity to comment on this project and are available for any questions you may have.

Sincerely,  
  
Elizabeth Kingsland  
Tahoe Coordinator  
Nevada Tahoe Resource Team  
Nevada Division of State Lands

5-1

**Letter  
5**

**Nevada Division of State Lands**  
June 30, 2017

---

- 5-1      The commenter provides introductory comments related to the Nevada Division of State Land's role in managing the Van Sickle Bi-State Park. The commenter notes that a private development is under construction adjacent to the park and expresses concern that the potential impacts of this development project may not have been fully analyzed in the Draft EIR/EIS/EIS. The commenter also states that the State of Nevada will not authorize granting access to private development through lands owned by the State of Nevada or through Van Sickle Bi-State Park to accommodate the locally preferred action design for US 50. The discussion under the header "Project Refinements to Alternative B" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS and Response to Comment 3-2 discuss access to the Gondola Vista development and potential effects on the park. Access for private development through lands owned by the State of Nevada or through Van Sickle Bi-State Park is not proposed.



**Jessica Mitchell**

**From:** Skip Canfield <scanfield@lands.nv.gov>  
**Sent:** Monday, July 03, 2017 1:13 PM  
**To:** Jessica.Mitchell@ascentenvironmental.com; info@tahoetransportation.org; nanette.hansel@ascentenvironmental.com; tavance@trpa.org  
**Cc:** Skip Canfield; Elizabeth A. Kingsland; Charlie Donohue  
**Subject:** Canfield - State Agency Comments E2017-141 DEIS US 50 South Shore Revitalization Project  
**Attachments:** E2017-132 SHPO (DEIS - US50 South Shore Community Revitalization Project,...pdf

The Nevada State Clearinghouse received the attached comments from SHPO regarding this proposal;  
<http://clearinghouse.nv.gov/public/Notice/2017/E2017-141.pdf>

Also, the Nevada Tahoe Resource Team, within the Nevada Division of State Lands, will be commenting directly regarding some specific issues.

Finally, speaking for the State Land Use Planning Agency, I have reviewed the alternatives (which all have their merits) and believe the one with the most benefits to the community is Alternative "C" - US 50 Triangle One-Way Alternative, for the following reasons:

From experience, any time the number of lanes are reduced, their footprints moved towards the road's centerline, pedestrian access ways expanded, and traffic is limited to one-way traffic only.... there is created a mutual benefit for both vehicles, pedestrians and bicyclists. Alternative "C" includes all of these parameters. The pedestrian core along US 50 and also Lake Parkway will have improved safety. Drivers of vehicles will have reduced potential for collisions with other vehicles due to the reduced number of conflict points. Pedestrians crossing US 50 in the Casino/commercial core and also accessing the Van Sickle Bi-State Park will have less potential for vehicle conflict with the proposed one-way traffic pattern. Reduced lanes and narrower road profiles encourage slower traffic speeds. Including the pedestrian bridge, an expensive option, will be funds well spent, as this has been proven to be a significant benefit in many urban cores.

Of particular interest to me as a pedestrian and bicyclist is Section 2.3 (common features to Alternatives B, C, and D.) I believe that the mitigation and enhancement measures described in Subsection 2.3.3 - "Corridor Improvements and Enhanced Bicycle, Transit and Pedestrian Facilities", Subsection 2.3.4 - "Signage Plan", Subsection 2.3.5 - "Lighting Plan", and Subsection 2.3.6 - "Landscaping" are all excellent and propose improvements that will drastically change the character and livability of the area for the better.

Thank you for the opportunity to provide these comments.

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](http://www.lands.nv.gov)

6-1

**Letter  
6**

**Nevada State Clearinghouse**  
July 3, 2017

- 6-1 The commenter references an attached letter from the Nevada State Historic Preservation Officer, which is addressed in Response to Comment 7-1, and a forthcoming comment letter from the Nevada Division of State Lands, which is addressed in Response to Comment 5-1.
- The commenter also states a preference for Alternative C, asserting that Alternative C would result in the most benefits to the community. The commenter also states that the pedestrian and bicycle improvements described in Section 2.3, “Common Features of Alternatives B through D,” of the Draft EIR/EIS/EIS (with emphasis on Subsections 2.3.3, 2.3.4, 2.3.5, and 2.3.6) are excellent and improvements that would drastically change the character and livability of the area for the better. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.

**E2017-132 (DEIS - US50 South Shore Community Revitalization Project)**

**Letter  
7**

The SHPO has reviewed the subject document. The Nevada SHPO has no record of receiving the federal agency's consultation documentation under Section 106 of the National Historic Preservation Act. To avoid any delays in the progress of the project, the SHPO recommends that the federal agency initiate all necessary consultation with this office under Section 106 of the National Historic Preservation Act at their earliest convenience.

7-1

Regards,

Rebecca Lynn Palmer  
State Historic Preservation Officer  
901 South Stewart Street, Suite 5004  
Carson City NV 89701  
(phone) 775.684.3443



**Letter  
7**

**Nevada Historic Preservation Officer**  
July 3, 2017

- 7-1 An Architectural Inventory Report and Archaeological Survey Report for the portions of the project within Nevada were submitted by TTD to the Nevada State Historic Preservation Office (SHPO) by TTD prior to circulation of the Draft EIR/EIS/EIS in December 2015. These cultural reports were updated to meet current format requirements in March 2018 and were re-submitted to SHPO on March 22, 2018 by NDOT on behalf of FHWA. The Nevada SHPO has reviewed these reports and concurred with their findings as indicated in the concurrence letter included in Chapter 5, “Consultation and Coordination,” of this Final EIR/EIS/EIS.



*"We will reflect the National Treasure in which we live"*

Letter  
8

July 7, 2017

Russ Nygaard  
Transportation Capital Program Manager  
Tahoe Transportation District  
P.O. Box 499  
Zephyr Cove, NV 89448

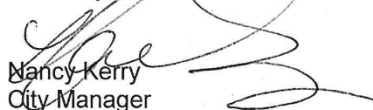
Mr. Nygaard,

Thank you for the opportunity to review and provide comments on the US50/South Shore Community Revitalization Project Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). The City of South Lake Tahoe (City) looks forward to opportunities to participate in the transportation planning process in the Lake Tahoe Basin, especially where it will improve transportation experiences and options in the South Shore area. The City respectfully submits the following comments on the EIR/EIS:

1. Section 3.4-5, Community Impacts, relies on data provided in the 2014 City of South Lake Tahoe Housing Element Background Report for data related to housing characteristics in the City. Much of the data for this document was sourced from the 2000 and 2010 US Census American Community Survey. The EIR/EIS analysis would benefit from the use of more recent data as demographics, and housing characteristics in the City of South Lake Tahoe have changed since 2010. For example, the 2015 American Community Survey data indicates a decrease in the number of housing units available for rent since 2010. Between 2010 and 2015, about 6% percent of the city's occupied housing was converted to vacant and 9.1% of vacant housing is available for rent in 2015 versus 15% in 2010. The jobs to housing ratio in 2015 is over 1.0, indicating a shift from fewer jobs than available housing (2010 ratio of 0.8) to fewer housing units than available jobs. All analysis should utilize the most recent available data, which may influence analysis outcomes.
2. The EIR/EIS analysis should be updated to reflect the construction of the Gondola Vista Project, which consists of 20-unit residential condominiums located adjacent to Van Sickle Bi-State Park. Access to the project is provided directly from Lake Parkway and none of the realignment alternatives currently show an access drive to the project site. Construction of the Gondola Vista Project may influence analysis outcomes.

Once again, thank you for the opportunity to participate in the environmental impact analysis process and for your attention to the items listed above. Feel free to contact me if you have any questions.

Sincerely,

  
Nancy Kerry  
City Manager

8-1

8-2

Letter  
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City of South Lake Tahoe  
July 7, 2017

- 8-1 The commenter suggests that data from the *City of South Lake Tahoe 2014-2022 Housing Element Update* be replaced with more current data available through the U.S. Census American Community Survey for statistics related to housing vacancy and the jobs-to-housing ratio.

Project impacts related to housing vacancy are addressed in the analysis of alteration of the location, distribution, or growth of the human population for the Region during construction and operation (Impacts 3.4-2 and 3.4-3 of the Draft EIR/EIS/EIS) and analysis of housing supply availability, including affordable housing (Impact 3.4-4). Regarding housing supply, the project would replace the housing units that would be displaced by the project. The project also provides an opportunity to construct additional housing units, which could supplement the supply of housing in the South Shore area and meet the housing needs of people employed at new jobs provided by the project. However, the commenter is correct and the jobs-to-housing ratio information has been revised in this final environmental document. This change is presented in Section 3.4, "Community Impacts," of this Final EIR/EIS/EIS. The correction does not alter the conclusions with respect to the significance of any environmental impact.

The third paragraph on page 3.4-7 of the Draft EIR/EIS/EIS is revised to read as follows:

Not all vacant housing in the City of South Lake Tahoe, Douglas County, Stateline CDP, and CIA study area is affordable or available to people who would like to live and work in these areas. As described in the City of South Lake Tahoe Housing Element Background Report, the reason is because a large proportion ~~(78.8 percent in the City of South Lake Tahoe as of 2010)~~ of the vacant housing is considered vacant for seasonal, recreational, or occasional use (City of South Lake Tahoe 2014:4-16 – 4-17). In 2014, approximately 80 percent of vacant housing units were available as seasonal, recreational, or occasional use rentals (U.S. Census Bureau 2015h). In 2010/2014, the city had approximately 15/11 percent of vacant homes were available for rent long-term renters and approximately 3/less than 1 percent were available for sale (City of South Lake Tahoe 2014:4-17/U.S. Census Bureau 2015h). Similar vacancy data for Douglas County, Stateline CDP, and the CIA study area was not readily available, but it is widely understood that these also supports the general understanding that these other areas within the Tahoe Basin experience similar shortages of long-term rental vacancies and it is reasonable to assume that these areas experience similar vacancy statistics as the City of South Lake Tahoe.

The last paragraph on page 3.4-10 and Table 3.4-6 on page 3.4-11 of the Draft EIR/EIS/EIS are revised to read as follows:

The City of South Lake Tahoe General Plan Housing Element provides information about the jobs to housing ratio within the city and county (Table 3.4-6). In 2010/2014, the jobs-to-housing ratio was 0.6 in the city and 1.0 in the county (see Table 3.4-6). This indicates that within the city, there are fewer jobs than available housing. Within the county, the amount of jobs and demand for housing is balanced. The number of housing units used in the jobs-housing ratio identified in Table 3.4-6 represents the total units, regardless of their status as owner-occupied, renter-occupied, or vacation rental; therefore, the jobs to housing ratio for housing only used by permanent residents could be greater than what is shown in the table. The jobs-to-available

housing ratio focuses on owner- and renter-occupied homes, including vacant housing for rent or for sale, and omitting seasonally occupied homes and homes that are vacant and for vacation rental use. Based on the jobs-to-available housing ratio for the city, CIA study area, and Douglas County, there appears to be ample housing stock. It is important to note that this ratio does not account for housing units that are occupied by multiple wage earners and does not account for housing units that may be solely occupied by retired individuals.

**Table 3.4-6 Jobs-to-Housing Ratio**

	South Lake Tahoe		El Dorado County	
	2000	2010	2000	2010
Housing Units	14,050	15,087	71,278	88,159
Employed Residents	11,953	12,223	73,821	84,829
Jobs Housing Ratio	0.9	0.8	1.0	1.0

Source: City of South Lake Tahoe 2014:4-22

**Table 3.4-6 Jobs-to-Housing Ratio (2014)**

Area	Employees	Total Housing Units	Occupied Housing Units	Vacant Housing for Rent or for Sale	Jobs-to-Housing Ratio	Jobs-to-Available Housing Ratio <sup>1</sup>
City of South Lake Tahoe	10,556	16,337	8,585	859	0.6	1.1
Douglas County	20,387	23,677	19,765	426	0.8	1.0
Stateline CDP	601	454	420	0	1.3	1.4
CIA Study Area	3,589	6,306	3,258	294	0.6	1.0

<sup>1</sup> The available housing units used to calculate the jobs-to-available housing ratio is the sum of the occupied housing units and vacant housing for long-term rent or for sale.

Source: U.S. Census Bureau 2015e, 2015g, 2015h

The impact summary on page 3.4-29 of the Draft EIR/EIS/EIS is revised to read as follows:

### **Impact 3.4-3: Alter the location, distribution, or growth of the human population for the Region during operation**

Alternatives B, C, and D transportation improvements and Alternative E could result in additional road and facility maintenance needs during operation but would not generate demand for a substantial number of new employees. The transportation improvements do not include components that would increase population and, thus, would not generate additional demand for housing. Alternatives B, C, and D transportation improvements and Alternative E would not alter the location, distribution, or growth of the human population planned for the Region.

Alternatives B, C, and D mixed-use development, including replacement housing, would result in the same needs for additional road and facility maintenance needs described for these alternatives transportation improvements. With development of

new commercial and housing units associated with buildout of the mixed-use development, including replacement housing. Alternatives B, C, and D would generate an estimated net increase of up to approximately 180-80 – 210-280 new jobs and an estimated net population increase of approximately 320 – 340 people (after accounting for replacement of housing and employment displaced by the project). The additional demand for employees would likely be met by existing residents in the South Shore area. Furthermore, the employment and population growth generated by the mixed-use development, including commercial and residential uses, has been planned for as part of the Regional Plan and the *Tourist Core Area Plan*. Because employment needs generated by the project could be met by existing residents and the project would include new housing, buildout of the mixed-use development would not generate new employment that would induce substantial population growth such that additional housing would be required to be constructed. Future development at any of the three mixed-use development sites would be subject to subsequent project-level environmental review and permitting by the City of South Lake Tahoe and/or TRPA that would include mitigating any adverse physical effects on the environment associated with a jobs and housing imbalance. Thus, Alternatives B, C, and D mixed-use development, including replacement housing, would not alter the location, distribution, or growth of the human population planned for the Region.

Alternative A would not result in any changes to existing conditions that would increase housing demand. Alternative A would not alter the location, distribution, or growth of the human population planned for the Region.

NEPA Environmental Consequences: The design features of Alternatives B, C, D, and E would avoid or minimize effects related to alteration of the location, distribution, or growth of the population during operation; No Impact for Alternative A

CEQA/TRPA Impact Determinations: Less Than Significant for Alternatives B, C, D, and E; No Impact for Alternative A

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The second and third full paragraphs on page 3.4-31 in the Draft EIR/EIS/EIS and the fourth paragraph on page 3.4-31 that continues onto page 3.4-32 are revised to read as follows:

**Mixed-Use Development including Replacement Housing**

Prior to displacing existing residents, Alternative B would construct replacement housing along with supporting commercial uses that could be located at one or more of three mixed-use development sites identified within the project site (see Exhibits 2-9 and 2-11 in Chapter 2, “Proposed Project and Project Alternatives”). If replacement housing is not constructed at any of these sites, then TTD would construct replacement housing at another location in the South Shore area to be determined prior to displacing any residents. Implementation of Alternative B mixed-use development, including replacement housing, would generate the same demand for maintenance employees as described above. Potential mixed-use development would generate additional demand for up to 269 employees associated with new commercial uses (Table 3.4-9), as well as up to 227 new housing units. Implementation of this alternative would displace up to 88 housing units, but would also result in a ~~net~~ increase of up to ~~177269 jobs~~, and a net increase of 139 housing units, and 317 residents (see Table 3.4-7). This increase in residential population would represent a 4 percent increase in the CIA study area population and a 1.5 percent increase in the City of South Lake Tahoe population.

The increase in additional employment generated by Alternative B with mixed-use development could lead to an increase in population growth and subsequent housing demand within the South Shore area and a change in the location and distribution of population, employment, and housing in the Region. The existing jobs-to-available housing ratio in the city is 1.1 and the jobs-to-available housing ratio in the CIA study area is 1.0 (see Table 3.4-6). The estimated 77 to 269 new jobs created by implementation of Alternative B with mixed-use development would offset the potential loss of an estimated 92 jobs displaced by construction of the realigned US 50 and new mixed-use development (see Impact 3.4-5 and Table 3.4-14 for further discussion of displaced businesses). After construction of the replacement housing, the net potential increase in new housing units would be up to 139 units. The mixed-use development ~~could~~would include deed-restricted affordable housing and market-rate housing that could ~~meet these~~serve some needs of these employees. As shown in Table 3.4-4, the unemployment rate in the South Shore area ranges from 5 percent in the CIA study area percent to 12.5 percent in the City of South Lake Tahoe. It is anticipated that demand for employees would likely be ~~partially~~ met by unemployed residents of the South Shore and would not require all new workers to come from outside of this area.

As shown in Table 3.4-2, housing vacancy rates range from approximately 7.5 percent in the Stateline CDP to approximately 50 percent in the CIA study area. As described above in “Housing Occupancy,” some of these housing units are likely vacation rentals or seasonal rentals, limiting actual available housing for new employees that may desire to relocate to the South Shore area. ~~and, a~~According to data from the U.S. Census Bureau, the City of South Lake Tahoe Housing Element Background Report, approximately 11.15 percent of vacant homes in the city were available as long-term rental units for rent and approximately 1.3 percent were available for sale. Other portions of the South Shore area and the Lake Tahoe Region have similar limited supplies of long-term rental vacancies. Therefore, because the addition of new jobs in the project site could be partially met by existing unemployed residents of the South Shore, this alternative is not anticipated to result in a substantial increase in population that would lead to an increased demand for housing that could not be met by the supply of existing vacant homes available for rent. If the reasonably foreseeable, conservative increase of up to 269 jobs and net increase of 139 housing units would occur, the project could result in the need to construct additional housing or require employees to commute into the Tahoe Basin. However, existing unemployed residents in the South Shore area would be anticipated to fill the available jobs and existing available long-term rentals as well as the new housing units could meet the need of any new employees that might move here from outside of the area.

For these reasons, buildout of the mixed-use development would not generate new employment that would induce substantial population growth such that additional housing would be required to be constructed. Future development at any of the three mixed-use development sites would be subject to subsequent project-level environmental review and permitting by the City of South Lake Tahoe and/or TRPA, which would consider the actual proposed number of new housing units and a more refined estimate of employee-generating commercial uses.

The location of new jobs and additional residences resulting from Alternative B with mixed-use development would be primarily within the TCAP boundaries. As described for Impact 3.4-2, construction of new housing units and CFA is limited to the number of allocations available, which are capped by the Regional Plan. Additionally, this area is planned (in the Regional Plan and TCAP) for an increase in density and

development with a mix of uses and is intended to concentrate development in town centers that are walkable, close to jobs, shopping, and entertainment. Implementation of Alternative B with mixed-use development would help to achieve the intent of the TCAP to provide for orderly, well-planned, and balanced growth and to develop a mix of uses that promote convenience, economic vitality, and a pleasant quality of life with a greater range of facilities and services for visitors and residents (City of South Lake Tahoe 2013:2-6). Furthermore, these types of changes to the density of development within the TCAP boundary were assessed in the TCAP and Regional Plan environmental documents (City of South Lake Tahoe 2013, TRPA 2012a). As shown in Table 3.4-10 and Exhibit 2-9, the estimated density of housing units in the mixed-use development would meet the density standards set forth in the TCAP and PAS 092. The TCAP environmental document determined that future development within the TCAP boundaries and the Region would meet future housing demand, including demand for affordable housing (City of South Lake Tahoe 2013:129-130). The Regional Plan EIS determined that buildout of the Regional Plan would result in a balance between jobs and housing and lead to more concentrated development in community centers, with greater improvements to walkability, feasibility of other alternative transportation, and the resultant benefits (TRPA 2012a:3.12-11 – 3.12-12).

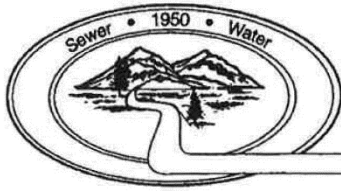
Because employment needs could be met by existing residents and the project would include new housing, buildout of the mixed-use development would not generate new employment that would induce substantial population growth such that additional housing would be required to be constructed. Future development at any of the three mixed-use development sites would be subject to subsequent project-level environmental review and permitting by the City of South Lake Tahoe and/or TRPA that would include mitigating any adverse physical effects on the environment associated with a jobs and housing imbalance. Implementation of Alternative B mixed-use development, including replacement housing, would not change the planned location and distribution of population, employment, and housing planned for the Region. For these reasons, this impact would be **less than significant** for the purposes of CEQA and TRPA.

The third sentence of third full paragraph on page 3.4-43 is revised to read as follows:

The Relocation Study concludes that there would be existing available housing units in the South Shore area that could be used as replacement housing. This remains true; however, the option to purchase and deed restrict or seek other replacement housing options in the South Shore area instead of constructing new housing units would conflict with the project objective related to a no net loss in housing supply. Additionally, as described in Section 3.4.1, “Housing Occupancy,” there is evidence to suggest that about ~~1145~~ percent of the supply of vacant homes are available for rent by full-time residents (see Section 3.4.1, “Housing Occupancy”).

- 8-2      The commenter states the analysis in the EIR/EIS/EIS should be updated to reflect construction of the Gondola Vista Project and how access would be provided to this development for the realignment alternatives. See the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action,” and Response to Comment 3-2 for a discussion of access to the Gondola Vista development and potential effects on the park.





# South Tahoe Public Utility District

General Manager  
 Randy Fogelberg  
**Letter  
 9**  
 Kelly Sheehan  
 Duane Wallace

1275 Meadow Crest Drive • South Lake Tahoe • CA 96150-7401  
 Phone 530 544-6474 • Fax 530 541-0614 • [www.stpud.us](http://www.stpud.us)

July 7, 2017

Tahoe Transportation District  
 Mr. Russ Nygaard, Transportation Capital Program Manager  
 PO Box 499  
 Zephyr Cove, NV 89448  
 Federal Highway Administration  
 Mr. Scott McHenry, Local Programs Manager, Project Delivery Team  
 650 Capitol Mall, Suite 4-100  
 Sacramento, CA 95814

**Re.: US 50 / South Shore Community Revitalization Project – EIR/EIS Comments**

Dear Mr. McHenry and Mr. Nygaard:

The South Tahoe Public Utility District (the District) has completed a review of the Draft EIR/EIS document for the US50 / South Shore Community Revitalization Project (the Project) and appreciates the opportunity to provide comment for this significant Project in our community.

We wish to again state the importance of considering the significant costs and impacts of right-of-way abandonments, and property transfers associated with Project Alternative B on the District's public water and wastewater facilities. As provided to Tahoe Transportation District (TTD) staff during the EIR/EIS development, the cost of water and sewer facility relocations and modifications required as a result of property transfers and loss of easements is estimated at \$3,014,772. Our understanding at that time was, and our continuing expectation is, that these costs will be paid for completely and exclusively by the Project and will not be a burden on the District's ratepayers within the community.

9-1

Please feel free to contact me at (530) 543-6209 or [jthiel@stpud.dst.ca.us](mailto:jthiel@stpud.dst.ca.us) with any questions regarding our comments or any other questions relating to your Project.

Sincerely,

John Thiel, PE, MBA  
 Engineering Department Manager  
 South Tahoe Public Utility District

Cc by email:

Shannon Cotulla, Assistant General Manager, South Tahoe Public Utility District  
 Trevor Coolidge, Associate Engineer, South Tahoe Public Utility District

*US 50 / South Shore Community Revitalization Project  
South Tahoe Public Utility District - EIR/EIS Comments*

- i. Summary Section S.4, Issues Subject to Public Controversy, Impacts on Utilities, page S-11: The statement is made that: "Any relocation of affected utility infrastructure would be coordinated with utility providers." Pursuant to meetings and correspondence with Project staff, utility relocations can be, and should be, minimized through the preservation of existing utility alignments via easements within existing public right-of-way for which abandonment is proposed.
- ii. Summary Section S.5, Table S-1, Summary of Resource Topics with Impacts and Avoidance, Minimization, and/or Mitigation Measures, Impact 3.5-1 Conflicts with Existing Utility Infrastructure, page S-26: Potential impacts as a result of required relocation in the context of lost surface access and physical conflicts with project improvements are included, but the potential impacts as a result of the abandonment of public right-of-way and loss of easements for public utilities are excluded. In a cost estimate provided to the TTD project staff on March 3, 2016, the District estimated that a loss of public-of-way and easements containing District water and wastewater infrastructure at \$3,014,772. Based on the potential costs and required construction activity associated with the associated with the abandonment of right-of-way required for the potential housing and commercial development, the District strongly requests that Mitigation Measure 3.5-1 include the maintenance of easements for existing public utilities and infrastructure to mitigate Project costs and minimize construction activities.
- iii. Summary Section S.5, Table S-1, Summary of Resource Topics with Impacts and Avoidance, Minimization, and/or Mitigation Measures, Impact 3.5-3 Increased demand for Wastewater collection, conveyance, and treatment, page S-28: Associated mitigation measure 3.5-3 identifies capacity upgrades would be a the cost of the Project. Pursuant to prior comments made regarding Mitigation Measure 3.5-1, the District seeks to have required Project relocations and/or easement acquisition costs borne completely and exclusively by the Project and not District water and sewer ratepayers.
- iv. Section 2.4.7, Realignment of Utility Lines, page 2-42: The relocation of "valves, meters, and manholes" is described as "minor." The District finds exception to the classification of these items as minor, as the work would potentially require the relocation of significant pipelines and gravity sewer systems, representing major relocations. Additionally, the Project document states that "Within the existing US 50 right of way, the cost to move and/or modify existing utilities would be determined by existing agreements between the utility providers and Caltrans and NDOT. Along the new US 50 alignment, it is anticipated that the project would be responsible for most, if not all, costs associated with relocations and modifications to existing utilities (page 2-42)." This differs from assurances that were made by the TTD project team to STPUD that the Project would bear all relocation costs, rather the District's ratepayers. The District also notes that the section is silent on the abandonment of City of South Lake Tahoe right-of-way and/or the forced relinquishment of any District easements. The District strongly

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*US 50 / South Shore Community Revitalization Project  
South Tahoe Public Utility District - EIR/EIS Comments*

requests that the Project document address the allocation of costs and impacts of losing public right-of-way and easements to public utilities and to clarify that these costs are not to be assumed by District ratepayers.

9-3  
cont.

- v. Section 2.4.8, Further Development of Project Design, page 2-44: Design exceptions note that features to reduce the roadway footprint would include five-foot wide sidewalks, rather than the standard width of six feet. The District notes that reducing minimum sidewalk widths may result in a conflict between required ADA clearances and the placement of fire hydrants and other utilities, such as cable boxes, transformers, and utility poles in the absence of available right-of-way or easements behind the sidewalk.

9-4

- vi. Section 3.5.1 Public Service and Utilities, Regulatory Setting, Public Service and Utilities, page 3.5-3: A fire flow rate of 750-1000 gpm for a 2-hour period is identified. The current code requirement is 3000 gpm for 3-hours.

9-5

- vii. Section 3.5.3 Environmental Consequences, Mixed-Use Development including Replacement Housing, page 3.5-13: The Project document states that "The sewer gravity lines connect to a sewer main located in existing US 50. The conceptual plan for mixed-use development does not identify the locations where buildings would be placed on this site; thus, because the STPUD lines are in place under an encroachment permit, access to these lines could be eliminated. Eliminating access at this point in the water and sewer infrastructure system would require STPUD to install additional infrastructure to convey water and sewer flows around this site." The District wishes to note that not all lines were placed via encroachment permit and may pre-date US 50; additionally, pursuant to prior comments, the District again strongly requests that this section identify the need to maintain utility easements to minimize significant Project costs and construction activities.

9-6

- viii. Section 3.5.4, Avoidance, Minimization, and/or Mitigation Measures, Mitigation Measure 3.5-1 Prepare and implement a Utility Relocation Plan, page 3.5-42: The proposed plan does not include the identification of new easement for utilities or the evaluation of maintaining utilities where they are currently located; the District again requests that easement issues be considered, with the Project being completely and exclusively responsible for any costs associated with required relocations and/or acquisition of new easements. The District also notes that this section is in conflict in stating that relocations will occur "...before construction of the realigned US 50....(page 3.5-42)" before stating that "...utility relocations would occur simultaneously with construction of the project and would be within the project disturbance area (i.e., the study area), the effects of the utility line relocations on the environment would be similar to, and not greater than, the environmental effects of the project...(page 3.5-43)."

9-7

*US 50 / South Shore Community Revitalization Project  
South Tahoe Public Utility District - EIR/EIS Comments*

- ix. Section 3.5.4, Avoidance, Minimization, and/or Mitigation Measures, Mitigation Measure 3.5-3 Ensure sufficient capacity in the STPUD wastewater collection and conveyance system, page 3.5-44: Reference is made to the project applicant paying for "their fair share" of localized sewer capacity improvements. This District again seeks for the Project document to identify that all water and wastewater relocation, capacity, and easement costs be borne by the Project. Within the same section, work on upgrading a sanitary sewer system is referenced to occur during daytime hours as a noise mitigation measure; the District seeks to advise that work within US 50 is regularly restricted by Caltrans to night-time hours and critical sewer work frequently occurs during low-flow periods, late in the evening, potentially impacting the proposed mitigation measure.

9-8

**Letter  
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**South Tahoe Public Utility District**  
July 7, 2017

- 9-1 The commenter notes previous information that STPUD provided to TTD regarding water and sewer facility relocations and modifications that could occur as a result of the project, and related costs. The commenter asserts that their understanding is that the costs associated with these impacts would be paid for by the project proponent, TTD, and would not be a burden on STPUD ratepayers. This comment is a summary of more detailed comments provided below. See Responses to Comments 9-2 through 9-8 below.
- 9-2 The commenter asserts that utility relocations can be, and should be, minimized through the preservation of existing utility alignments via easements within existing public right-of-way for which abandonment is proposed. Standard engineering design practices attempt to minimize impacts to utilities, where feasible, to minimize disturbances and reduce project costs. Additionally, through implementation of Mitigation Measure 3.5-1, TTD would coordinate with utility providers, including STPUD, related to all necessary relocations of utility infrastructure, which would also encompass maintaining access and easements to utility alignments that may remain as well as relocated infrastructure.
- 9-3 The commenter identifies three concerns: (1) Impact 3.5-1 and Mitigation Measure 3.5-1 do not include a discussion of potential effects related to abandonment of public right-of-way and loss of easements for public utilities; (2) TTD pays for relocations and/or easement acquisitions associated with impacts of the project; and (3) relocation of valves, meters, and manholes may not be “minor” because they could require relocation of pipelines and gravity sewer systems.

In coordination with utility providers at the time of final design, TTD would pay for relocation of utility infrastructure, which could include maintaining utility access and easements; valves, meters, and manholes; and relocation of pipelines and gravity sewer systems. The specific relocations of existing utilities, including valves, meters, and manholes and any associated relocations of pipelines and gravity sewer systems would be determined through implementation of Mitigation Measure 3.5-1. Additionally, as previously described, standard engineering design practices seek to limit impacts on utilities, as applicable and feasible, to reduce costs, construction, and impacts.

To clarify TTD’s commitment to incorporating the cost of utility infrastructure, access, and easement relocations, the following revision has been made to the second sentence of the second full paragraph on page 2-43 of the Draft EIR/EIS/EIS and is presented in Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures”:

Within the existing US 50 right of way, the cost to move and/or modify existing utilities would be determined by existing agreements between the utility providers and [California Department of Transportation] Caltrans and [Nevada Department of Transportation] NDOT. Along the new US 50 alignment, it is anticipated that [the project would be responsible for all most, if not all, costs associated with relocations and modifications to existing utilities- caused by the construction of the project. Any upgrade determined by the utility companies to be done during construction would be paid for by the utility company. The highway realignment does not cause capacity issues with utility systems. If the mixed-use development sites are developed and create a need to increase capacity, those costs would become part of the mixed-use development project and included in the project level environmental document for

the development. TTD would oversee both the project contractor and utility relocation work during construction. Once constructed, the utility facilities would be owned and operated, including maintenance costs, by the utility companies.

Additionally, to clarify that Mitigation Measure 3.5-1 would address the need to mitigate for and maintain access and easements for utilities as well as clarifying that design of the project would seek to avoid impacts on utility infrastructure, access, and easements to the extent feasible, the mitigation measure is revised as follows here and is presented in Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures.” The correction does not alter the conclusions with respect to the significance of any environmental impact.

The mitigation measure on pages 3.5-42 through 3.5-43 of the Draft EIR/EIS/EIS is revised to read as follows:

### **Mitigation Measure 3.5-1: Prepare and implement a Utility Relocation Plan**

This mitigation measure is required for Alternatives B, C, and D transportation improvements and mixed-use development, including replacement housing, and Alternative E, for the purposes of NEPA, CEQA, and TRPA.

Before the start of construction-related activities, including demolition of displaced residential, hotel/motel, and commercial buildings, the TTD (and the project proponent for the mixed-use development, as applicable) shall coordinate with STPUD, DCSID, EWC, Lakeside Park Association, Liberty Utilities, NV Energy, and Southwest Gas Corporation to relocate utility infrastructure, which is dependent on the alternative and could include infrastructure at and near the existing US 50/Pioneer Trail and Pioneer Trail/Echo Road intersections and along US 50, Fern Road, Moss Road, Primrose Road, Montreal Road, and the lake side of Lake Parkway. The final design plans for the transportation improvements submitted to Caltrans and NDOT shall be prepared to minimize utility disruption or relocation, and identify all utility relocations affected by the transportation improvements. TTD (and the project proponent for the mixed-use development, as applicable) shall coordinate with the utility companies to minimize impacts to services throughout the project. ~~To minimize disruption to utility services, relocation of the utility lines shall occur after any required clearing and demolition within the study area and before construction of the realigned US-50, and other transportation improvements. Actions needed to comply with this mitigation measure include coordination with each affected utility company to prepare a utility relocation plan that would, at a minimum, include the following:~~

- ▲ plans that identify the utility infrastructure elements, including access for utility providers and easements, as applicable, that require relocation as a result of constructing the project transportation improvements and mixed-use development, including replacement housing;
- ▲ safety measures to avoid any human health hazards or environmental hazards associated with capping and abandoning some utility infrastructure, such as natural gas lines or sewer lines;
- ▲ timing for completion of the utility infrastructure relocation as part of construction of the transportation improvements and mixed-use development, including replacement housing, which shall be scheduled to minimize disruption to the utility companies and their customers;

- ▲ reparations, if required, and certification of necessary additional environmental evaluations and pertinent processes (e.g., CEQA, NEPA, and/or TRPA documents and requirements), all of which shall be completed, as necessary, before final plans for the mixed-use development, including replacement housing, are permitted;
- ▲ preparation and approval by a licensed civil engineer; and
- ▲ approval as adequate by the affected utility companies and Caltrans, NDOT, TTD, and TRPA, as necessary.

9-4 The commenter notes that the proposed nonstandard design of the sidewalks (5 feet wide instead of 6 feet wide) could result in conflicts with the Americans with Disabilities Act (ADA) and placement of fire hydrants and other utilities. As listed on page 2-44 of the Draft EIR/EIS/EIS, the narrower sidewalk width would only be required for a portion of the sidewalk on the eastbound shoulder of US 50 west of Midway Road. ADA standards allow for reducing the clearance around objects, such as fire hydrants or utility poles, to as little as 32 inches (ADA Section 403.5.1). As part of final design refinements, the locations of fire hydrants and other utility infrastructure can be relocated, if necessary, to comply with ADA clearance requirements.

9-5 The commenter notes that the minimum fire flow rate referenced in the regulatory setting for Section 3.5, “Public Services and Utilities,” is incorrect. The commenter is correct and the fire flows, which vary by some of the different uses within the project area, have been revised in this final environmental document. This change is presented in Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures,” of this Final EIR/EIS/EIS. The correction does not alter the conclusions with respect to the significance of any environmental impact.

The third paragraph on page 3.5-3 of the Draft EIR/EIS/EIS is revised to read as follows:

According to Code Section 32.4.2, adequate fire flows vary by land use within the study area and include:~~for a project in the Tourist Core Area Plan requires 750 – 1,000 gallons per minute (gpm) over a 2-hour period at 20 pounds per square inch (psi) residual pressure.~~

- ▲ Residential Plan Areas (single-family only): 500 – 750 gallons per minute (gpm) at 20 pounds per square inch (psi) for 2 hours
- ▲ Residential Plan Areas (multi-residential): 750 - 1000 gpm at 20 psi for 2 hours
- ▲ Tourist Plan Areas: 1,000 – 1,500 gpm at 20 psi for 2 hours
- ▲ Hotel - Casino Areas: 3500 - 6000 gpm at 20 psi for 3 to 6 hours

9-6 The commenter notes that not all utility lines were placed via encroachment permit and some utility lines may pre-date the existing highway (US 50), and requests that the section identify the need to maintain utility easements. See Response to Comment 9-3. Also, to clarify TTD’s responsibility to pay for the cost of utility relocations required for the project, the following revision is made as follows and is presented in Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures.” The correction does not alter the conclusions with respect to the significance of any environmental impact.

The fourth sentence of the fifth paragraph on page 3.5-13 of the Draft EIR/EIS/EIS is revised to read as follows:

With regard to mixed-use development Site 2, STPUD has expressed concern related to water lines and sewer gravity lines along Echo Road and Fern Road that extend through this site (Cotulla et al., pers. comm., 2016). The sewer gravity lines connect to a sewer main located in existing US 50. The conceptual plan for mixed-use development does not identify the locations where buildings would be placed on this site; thus, because the STPUD lines are in place under an encroachment permit, access to these lines could be eliminated. Eliminating access at this point in the water and sewer infrastructure system would require STPUD to install additional infrastructure to convey water and sewer flows around this site at the expense of TTD or the project proponent for the mixed-use development, as applicable. Because mixed-use development, including replacement housing, on Site 2 could conflict with STPUD water and wastewater infrastructure at this location, this would be a **potentially significant** impact for the purposes of CEQA and TRPA.

- 9-7 The commenter requests that Mitigation Measure 3.5-1 be revised to consider easement issues, with the project proponent being completely and exclusively responsible for any costs associated with required relocations and/or acquisition of new easements. The commenter also asserts that the characterization of timing of utility relocations on pages 3.5-42 and 3.5-43 of the Draft EIR/EIS/EIS are in conflict. See Response to Comment 9-3 for revisions to Mitigation Measure 3.5-1 related to maintaining utility easements and access and timing of utility relocations.
- 9-8 The commenter requests that the project proponent, TTD, pay for all utility relocation, capacity, and easement costs resulting from implementation of Mitigation Measure 3.5-3. The commenter is also concerned that some utility work could occur outside of daytime hours and could result in noise impacts to sensitive receptors. The impact resulting in surcharge at two locations in STPUD wastewater conveyance lines would be caused by buildout of the mixed-use developments. The construction of all three potential mixed-use development sites would occur only as a public-private partnership, which would include TTD and a private developer. Development of a single site could be done by TTD alone if necessary to complete replacement housing. The impact on capacity in the line between Sanitary Sewer Manhole (SSMH) BJ182 and SSMH BJ181 and at SSMH BJ25 would not occur unless buildout of the mixed-use developments were to occur. Future development at any one of the mixed-use development sites would undergo project-level environmental review to narrow down impacts of the project. Additionally, the responsibility for paying costs of different aspects of the project, such as potentially required improvements to STPUD infrastructure, would be determined as part of the agreement between TTD and its private partner for the mixed-use development. If any construction of utility relocations or infrastructure would occur outside of the exempted hours, construction activities would be required to adhere to noise-reduction requirements imposed by TRPA, the City of South Lake Tahoe and/or Douglas County, Caltrans, and NDOT. Additionally, the construction activities would be short-term and temporary in nature and would not be considered a new, permanent stationary noise source.



## Organizations

Lake Tahoe South Shore  
Chamber of Commerce



160 Highway 50  
Edgewood Village, Bldg. D  
Post Office  
Stateline  
89414  
775.5  
775.5

Letter  
10

June 23, 2017

Mr. Jim Lawrence, Chair  
Mr. Bill Yeates, Vice Chair  
Members, Governing Board  
Tahoe Regional Planning Agency  
PO Box 5310  
Stateline, NV 89449

**Re: Initial Comments - Public Draft EIR/EIS/EIS for the  
US 50/South Shore Community Revitalization Project**

Dear Chair Lawrence, Vice Chair Yeates, and Governing Board Members:

On behalf of our Board of Directors and members, the Government Affairs Committee of the Lake Tahoe South Shore Chamber of Commerce (Tahoe Chamber) is pleased to provide you with our comments on the Public Draft environmental analysis for the above-referenced project.

We note for the record that the federal, state and regional agencies involved in review of the Administrative Draft EIR/EIS/EIS, including TRPA staff, gave the document a very thorough evaluation before authorizing release of the document for public review. We understand many refinements were made during this time. We believe the full document, including the appendices, is thorough and comprehensive. We also believe the range of alternatives analyzed meets the requirements of pertinent environmental laws and guidelines.

Here is a summary of our initial conclusions:

- Tahoe Chamber was actively involved in the process of developing the Purpose, Needs and Objectives for this Project, as summarized in Summary Section S.2. We firmly support these as appropriate for the project.
- Alternative A, the No Build Alternative, does not meet the Project Purpose, Needs and Objectives.
- Alternative E, the Skywalk Alternative, does not meet the Project Purpose, Needs and Objectives. It is inconsistent with expanding the street level pedestrian experiences that currently exist on the California side of Stateline into Nevada. Alternative E fails to stimulate the comprehensive community revitalization Tahoe Chamber believes is a vital component and outcome of the project.
- Alternative D, the "Project Study Report Alternative 2" would unnecessarily constrict the project area at its southeast quadrant in California, thereby reducing an element of flexibility without providing any superior improvements over Alternative B.

10-1

10-2

10-3

10-4

Lake Tahoe South Shore  
Chamber of Commerce



169 Highway 50  
Edgebrook Village, Bldg. D  
Post Office Box 7139  
Stateline, Nevada  
89449

775.688.726 ph  
775.688.1941 fx

- Alternative C, the Triangle One-Way Alternate also fails to provide a superior level of improvements. While it would reduce the right-of-way needs relative to Alternative B, in terms of acquisitions and relocations, it would affect nearly the same number of parcels as Alternative B.

10-5

We understand why Alternative B has been designated in the document as the "Locally Preferred Action" as it reflects the best opportunity to meet the adopted Project Purpose, Needs and Objectives.

#### Additional Tahoe Chamber Perspectives

Several chamber members served on the Community Review Committee (CRC) or the Business Review Committee (BRC) formed by the Tahoe Transportation District (TTD) in 2013. These were both community forums for providing input into the development of project alternatives and evaluation.

Tahoe Chamber commends the TTD for approval (in May 2016) of "Guiding Principles related to Right-of-Way, Housing, Road Construction, Assistance and Support for Affected Businesses, and Continued Community Involvement" as the District's adopted set of commitments to guide the development and implementation of the US 50/South Shore Community Revitalization Project, including the following commitments:

10-6

- The necessary right-of-way will be acquired prior to the start of road construction.
- Existing developed and occupied real estate will not be removed until project construction is funded and residential and business relocation is completed.
- All eligible residents directly affected by the project will be relocated fairly and equitably in accordance with the federal Uniform Act.

We are pleased the District is updating its economic analysis of the project, first prepared in 2013. As a business organization that closely tracks trends and our South Shore business climate, we anticipate the update will confirm an even more beneficial economic impact than documented in the first report.

We understand that the project alternatives analyzed in this draft EIR/EIS/EIS are at approximately 30 percent design. Once a preferred project alternative is selected, we know significant final design and other project development details are ahead. We recognize the US 50/South Shore Community Revitalization Project is a complex, multi-year endeavor with a variety of important elements, all of which must be sequenced and coordinated with many project partners and funding sources. Tahoe Chamber will remain actively engaged in the project development and implementation process.



169 Highway 50  
Edgewood Village, Bldg. D  
Post Office Box 7139  
Stateline, Nevada  
89449

775.588.1728 **ph**  
775.588.1941 **fx**

Respectfully submitted,

Liz Lundholm, Chair  
Government Affairs Committee

Nick Exline, Vice Chair  
Government Affairs Committee

**Letter  
10**

**Tahoe Chamber**  
June 23, 2017

- 10-1 The commenter notes the EIR/EIS/EIS and appendices are thorough and comprehensive, the range of alternatives complies with applicable regulations, and expresses support for the project purpose, needs, and objectives. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 10-2 The commenter notes that Alternative A does not meet the project purpose, needs, and objectives. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 10-3 The commenter notes that Alternative E does not meet the project purpose, needs, and objectives and would not stimulate comprehensive community revitalization that is a vital component of the project. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 10-4 The commenter notes that Alternative D would constrict the area between the realigned highway and the Heavenly Village Center and the flexibility for improvements would be reduced. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 10-5 The commenter states that Alternative C reduces right-of-way needs but would still affect a similar number of parcels as Alternative B and would also not provide a superior level of improvements. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.

- 10-6      The commenter notes that Alternative B reflects the best opportunity to meet the purpose, needs, and objectives. The commenter summarizes the Lake Tahoe South Shore Chamber of Commerce participation in the Community Review Committee and Business Review Committee and expresses support for TTD's "Guiding Principles related to Right-of-Way, Housing, Road Construction, Assistance and Support for Affected Businesses, and Continued Community Involvement;" the economic analysis for the project; and the additional work that would be required to implement the project. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.



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**Letter  
11**

July 7, 2017

Tahoe Transportation District  
Attn: Russ Nygaard, Transportation Capital Program Manager  
P.O. Box 499  
Zephyr Cove, NV 89448

Tahoe Regional Planning Agency  
Attn: Shannon Friedman, Senior Planner  
128 Market Street  
Stateline, NV 89449

Federal Highway Administration  
Attn: Scott McHenry, Local Programs Manager, Project Delivery Team  
650 Capitol Mall, Suite 4-100  
Sacramento, CA 95814

Dear Mr. Nygaard, Ms. Friedman and Mr. McHenry:

The League to Save Lake Tahoe (the "League") appreciates the opportunity to review the Draft Environmental Impact Report/Environmental Impact Statement (the "DEIR/EIS") for the U.S. 50/South Shore Community Revitalization Project (the "Project") advanced by the Tahoe Regional Planning Agency ("TRPA"), the Tahoe Transportation District ("TTD") and the Federal Highway Administration (collectively, the "Project Proponents").

The League is dedicated to protecting and restoring the environmental health, sustainability and scenic beauty of the Lake Tahoe Basin (the "Basin"). In connection with our mission, we advocate for the implementation of policies contained within regional land use and planning documents, including, without limitation, the Bi-State Compact (the "Compact"), the 2012 Regional Plan Update (the "Regional Plan"), the 2012 Regional Transportation Plan (the "2012 RTP") and the 2017 Regional Transportation Plan (the "2017 RTP"). This letter requests the inclusion of transportation solutions that incorporate policies and implement directives from these regional planning documents in the Final Environmental Impact Report/Environmental Impact Statement ("FEIR/EIS"), including improvements to transit service and the implementation of a corridor-wide parking management strategy that fulfills the objectives of the Linking Tahoe: Long Range Transit Master Plan recently released by TTD (the "Long Range Transit Plan"). The Project presents a timely opportunity for the City of South Lake Tahoe (the "City") and Douglas County to rescind outdated parking minimum requirements that contradict 2012 RTP and Compact directives to reduce reliance on the private automobile. If the replacement housing proposed to be

11-1

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## League to Save Lake Tahoe

2608 Lake Tahoe Boulevard  
South Lake Tahoe, CA 96150  
530.541.5388  
keeptahoeblue.org  
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constructed in connection with this Project is ultimately located outside the Project area, TTD must provide regular and reliable transit to and from the Tourist Core to offset any additional vehicle trips and associated impacts generated from the displaced workforce.

11-1  
cont.

The DEIR/EIS contains several flaws that must be corrected in the FEIR/EIS. The FEIR/EIS must include a supplemental traffic analysis because the DEIR/EIS improperly tiers off of the 2012 RTP's environmental review, relies on outdated traffic counts and omits the Douglas County Events Center from the related project list. Further, if this Project will result in the removal of a bike lane on Lake Parkway, the Project Proponents may not be able to make CEQA mandated findings that the project is consistent with the 2012 RTP.<sup>1</sup> Similarly, the lack of pedestrian crossings in the Rocky Point neighborhood is inconsistent with the 2012 RTP and requires mitigation. Any SEZ restoration should be in the same watershed as SEZ that is disturbed in connection with this Project and the League requests the completion of the required restoration plan prior to acknowledgment of the Project's permit.

11-2

Finally, although this is outside the scope of this environmental review, the League requests that, prior to Project approval, TRPA revise its air quality mitigation fees in conformance with TRPA Code and TRPA's internal policy and to better reflect current economic conditions. TRPA and TTD should also enter into a formal agreement regarding roles, responsibilities and funding prior to the bi-state transportation consultation between California and Nevada scheduled for this fall.

11-3

**1. The Project Should Incorporate Transportation Solutions That Implement Directives in the Compact, the Regional Plan, and the Regional Transportation Plan.**

As TRPA recently acknowledged in the 2017 RTP, "[t]he Bi-State Compact and California legislation mandates the Region to reduce reliance on the private automobile to decrease vehicle miles travelled and associated GHG emissions and protect water clarity."<sup>2</sup> Similarly, a primary objective of the 2012 RTP is to "establish a safe, secure, efficient, and integrated transportation system that reduces reliance on the private automobile."<sup>3</sup> The League supports the implementation of measures that advance these mandates, as well as other transportation initiatives that may lead to the reduction of fine sediment generated from roadways. Implementation of this Project presents a unique opportunity to further these goals and actualize Compact directives by improving transit service and implementing a corridor-wide parking management strategy.

11-4

**a. The Project Should Include Improvements to Transit Service, Including a Transit Pilot Project, that Support the Project's Transit Infrastructure Improvements.**

Improving transit service within the Basin is a recurring directive of local and regional land use plans and governing documents. Reducing "dependency on the automobile by making more effective use of existing transportation modes and of public transit to move people and goods within the region" is a primary objective of transportation planning under the Compact.<sup>4</sup> Similarly, the 2017 RTP advances policies that "improve the existing transit system for the user making it frequent, fun, and free" and requires the TRPA to develop "... formal standards for incorporating transit amenities in new development or redevelopment, as conditions of project approval."<sup>5</sup> A primary goal of the 2017 RTP is to "encourage efficient and effective expansion of public transit operations and use

11-5

<sup>1</sup> Reference is made to the 2012 RTP, as the DEIR/EIS examines consistency with this document.

<sup>2</sup> TRPA & Tahoe Metro. Planning Org. ("TMPO"), Linking Tahoe: Reg'l Transp. Plan (Apr. 2017) p. 3-2.

<sup>3</sup> TRPA & TMPO, Reg'l Trans. Plan: Mobility 2035 (Dec. 2012) p. 2-3.

<sup>4</sup> Tahoe Reg'l Planning Compact, Pub. L. No. 96-551, Art. 5 § (c)(2)(a).

<sup>5</sup> TRPA & TMPO, Linking Tahoe: Reg'l Transp. Plan (Apr. 2017) pp.2-4, 2-9.



within the Basin.”<sup>6</sup> The Long Range Transit Plan repeatedly identifies the need for increased transit service, particularly in the summer months.<sup>7</sup>

This Project presents a timely opportunity to advance these significant regional objectives. TTD recognizes the intrinsic importance of this opportunity, identifying transit service improvements as both fundamental goals and purposes of this Project. For example, basic Project objectives identified by TTD include decreasing dependence on the use of private automobiles, reducing traffic volumes through the tourist core, improving the connectivity, reliability, travel times and operations of public transportation modes, and making public transportation more effective with better visibility, connectivity, reliability and travel times.<sup>8</sup> The overall purpose of the Project is, among other things, to reduce traffic congestion, advance multi-modal transportation opportunities and implement regional and local transportation and land use plans.<sup>9</sup>

In addition to furthering planning and Compact directives and Project objectives, improving transit service would serve the purpose of advancing TRPA’s Threshold goals. The Compact directs TRPA to adopt environmental threshold carrying capacities (“Thresholds”) to protect the values of the region.<sup>10</sup> The adopted vehicle miles traveled (“VMT”) standard mandates the reduction of regional daily VMT in the Basin by ten (10) percent of the 1981 base year values.<sup>11</sup> Assuming the mixed use development associated with this Project is located within the Project area, it could potentially result in the net increase of 1,400 to 1,700 daily trips.<sup>12</sup> Additional transit service would likely convert many of these trips to non-auto modes, resulting in a corresponding decrease of VMT. Accordingly, improving transit service in the Project area would result in a reduction of VMT and the advancement of TRPA’s Threshold goals.

This Project does propose laudable transportation improvements, including enhanced transit access and the construction of new bus shelters.<sup>13</sup> However, it incorporates no improvements to transit service and therefore does not advance explicit Project objectives, regional planning goals and policies, or Threshold targets. In order to further these objectives, the Project should be tied to a transit pilot project or similar initiative that provides reliable, frequent service from areas outside the tourist core to/from within the Project area. Specifically, and in accordance with the recommendations contained within the Long Range Transit Plan, the Project should incorporate a program that provides frequent and reliable summer transit service to, within, and through the Stateline tourist core.

In addition to obligations imposed by regional land use and transportation plans, the FEIR/EIS must consider improved transit in the Project area as a potential mitigation measure for impacts related to exceedance of the VMT Threshold standard. CEQA requires an EIR to describe feasible measures that could minimize significant adverse impacts.<sup>14</sup> Further, “an adequate EIR must respond to specific suggestions for mitigating a significant impact unless the suggested mitigation is facially infeasible.”<sup>15</sup> ‘Feasible’ means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.”<sup>16</sup> Here, because implementation of the Regional Plan would not achieve VMT Threshold goals, and because this Project is included within the Regional Plan’s traffic analysis, the Project would contribute to a

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<sup>6</sup> TRPA & TMPO., Reg’l Trans. Plan: Mobility 2035 (Dec. 2012) p.2-6.

<sup>7</sup> TTD, Linking Tahoe: Transit Master Plan (Feb. 2017) pp.6, 21, 69, 83.

<sup>8</sup> Draft Envtl. Impact Report/ Envtl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) p.5-5.

<sup>9</sup> *Id.* at 5-2.

<sup>10</sup> Tahoe Reg’l Planning Compact, Pub. L. No. 96-551, Art. 5 § (b).

<sup>11</sup> TRPA, 2015 Threshold Evaluation Report (Dec. 2016) p.3.60.

<sup>12</sup> Draft Envtl. Impact Report/ Envtl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) p.3.13-26.

<sup>13</sup> *Id.* at 2-19.

<sup>14</sup> Cal. Code Regs., tit. 14, § 15126.4, subd.(a)(1).

<sup>15</sup> *Los Angeles Unified Sch. Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1029.

<sup>16</sup> Cal. Pub. Resources Code, § 21061.1; see Cal. Code Regs., tit. 14, § 15364.

cumulatively significant impact before consideration of mitigation.<sup>17</sup> The EIR must therefore respond to specific suggestions for mitigating this impact that are facially feasible.

The only mitigation measure offered by the DEIR/DEIS to address this impact is a program for the “phased release of land use allocations, followed by monitoring and forecasting of actual roadway traffic counts and VMT.”<sup>18</sup> This measure, which is also codified as TRPA Code Section 50.4.3, provides that:

New development allocations will be authorized for release by the TRPA Governing Board every four years, beginning with the approval of the Regional Plan in 2012. Approval of the release of allocations is contingent upon demonstrating, through modeling and the use of actual traffic counts, that the VMT Threshold Standard will be maintained over the subsequent four-year period.

On May 24, 2017, the TRPA Governing Board released residential allocations to the local jurisdictions. Because the base year for the Threshold evaluation was 2014, Code Section 50.4.3 required TRPA to demonstrate, through modeling and the use of actual traffic counts, that the VMT Threshold Standard would be maintained through 2018 prior to releasing these allocations. The staff summary included no four-year (2018) forecast. Because this mitigation measure exists but has not been implemented by TRPA to date and appears likely to never be effectively executed, the DEIR/EIS may not properly continue to depend on it to mitigate this impact. Accordingly, to the extent this DEIR/EIS relies on this measure to serve adequate mitigation for the potential exceedance of the VMT Threshold, such reliance is unwarranted.

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cont.

A transit pilot project that provides increased, reliable summer service to and within the tourist core is a facially feasible mitigation measure and must be considered in this instance. TTD confirms the direct connection between improved transit and the corresponding decrease in VMT in the Long Range Transit Plan, noting that the “greater the use of the transit system, the fewer vehicle miles travelled by automobile.”<sup>19</sup> Further, as discussed above, converting daily trips generated by the mixed use development to non-auto modes would likely result in reduced VMT, therefore advancing TRPA’s Threshold objectives. Accordingly, a transit pilot project that provides frequent, reliable service in and around the Tourist Core is a facially feasible potential mitigation measure. League staff have discussed the potential for such a pilot with TRPA and TTD staff, and look forward to the opportunity to continue working with TRPA and TTD to provide input and support as appropriate.

**b. If the Replacement Housing is Ultimately Located Outside of the Project Area, TTD Must Provide Regular, Reliable Transit to/from the Stateline Tourist Core.**

The preferred location for replacement housing is within the Project site, particularly within the mixed-use development sites identified by TTD. However, if development of these sites is not feasible, “TTD would construct replacement housing elsewhere in the South Shore area.”<sup>20</sup> The League understands that these plans are uncertain, and that any mixed-use development and any associated replacement housing will undergo future environmental analysis. However, should the replacement housing ultimately be located outside of the Project area, the Project must include reliable, frequent transit between such housing and the Tourist Core.

11-6

First, no beneficial reduction in regional VMT will occur if the replacement housing is located outside of the Project area. The DEIR/EIS correctly acknowledges that “locating development within the Tourist Core with a variety of land uses in close proximity would contribute to reducing VMT.”<sup>21</sup> However, this is true only if the underlying

<sup>17</sup> Draft Env'tl. Impact Report/ Env'tl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) p.3.19-8.

<sup>18</sup> *Id.* at 3.19-8.

<sup>19</sup> TTD, Linking Tahoe: Transit Master Plan (Feb. 2017) p.31.

<sup>20</sup> Draft Env'tl. Impact Report/ Env'tl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) p.2-6.

<sup>21</sup> *Id.* at p. 3.13-38.



assumptions of the 2012 RTP and Regional Plan are preserved. The Regional Plan and the 2012 RTP both rely on the theory that concentrating housing, employment and discretionary trip locations within the same area results in shorter trips on average and a reduction in VMT. However, this reduction in VMT will only occur when trips, on average, become shorter due to the concentration of land uses in town centers. In this case, if the replacement housing is located outside of the Project area, there is no concentration of land uses and no associated reduction in regional VMT.

Similarly, the DEIR/EIS's conclusion in the cumulative impact analysis that this Project would remain consistent with the VMT per capita goals of the 2012 RTP (which were determined to have a beneficial impact on VMT) is true only if the replacement housing is located within the Project area.<sup>22</sup> Twenty one (21) percent of workers who live in the Project area walk, bike, or depend on transit to get to work.<sup>23</sup> If replacement housing is not located within the Project area and functional and reliable transit service is not provided, these workers may need to shift to private auto modes and commute further to their jobs at Stateline, resulting in an increase in VMT per capita. On the other hand, if housing is provided within the Project area, the 79% of residents that currently use private auto may be able to shift to non-auto modes, thereby reducing VMT per capita within the Project area. In short, if the replacement housing is located outside of the Project area, this Project will not be consistent with the VMT per capita goals of the 2012 RTP; however, if it is located within the Project area, VMT per capita goals may be advanced.

11-6  
cont.

The League acknowledges that plans regarding the mixed-use development sites and the location of replacement housing are uncertain. However, should this housing be located outside of the Project area, TTD must adopt sufficient mitigation measures that account for the increase in VMT anticipated to result from non-concentrated land use patterns discouraged by the Regional Plan, including, without limitation, frequent and reliable transit service between any such housing and the Tourist Core.

**c. The Project Should Include and Incorporate a Comprehensive Corridor-wide Parking Management Strategy as Part of a Regional Effort to Reduce Reliance on Private Automobiles.**

The 2017 RTP encourages "... parking management programs that incentivize non-auto modes," discourages "private automobile use at peak times in peak locations," and proposes "minimiz[ing] parking requirements through the use of shared-parking facilities."<sup>24</sup> Strategies that reduce parking demand, encourage more efficient use of existing parking facilities, and incentivize a shift to non-auto modes are integral to the ongoing implementation of the 2012 RTP, the 2017 RTP and the Regional Plan, as well as the fulfillment of Compact directives related to transportation. TTD has the authority to own and operate public and private facilities for transportation, including parking lots.<sup>25</sup> Additionally, based on conversations with TRPA staff, it is the League's understanding that TTD has the authority to develop and enforce a regional parking management strategy.

11-7

**i. The Project Should Encourage Partnerships With The Private Sector and Prioritize Centralized Paid Parking With Good Wayfinding Signage and Electric Vehicle Infrastructure.**

Implementation of this project presents a unique opportunity for corridor-wide parking management that supports regional plug-in electric vehicle readiness planning, is located proximate to where residents and visitors are accessing the corridor, and has clear wayfinding. Optimal parking locations could include on the east and west gateways to the corridor, where travelers could easily park and walk to the multitude of destination options that the Tourist Core affords. Managed parking should be variably priced (based on peak period congestion and demand) and should rely on best practice technologies to provide real-time availability information. Plug-in Electric vehicle

<sup>22</sup> *Id.* at p. 3.19-23.

<sup>23</sup> *Id.* at p. 3.4-7

<sup>24</sup> TRPA & Tahoe Metro. Planning Org. ("TMPO"), Linking Tahoe: Reg'l Transp. Plan (Apr. 2017), Appendix A, Goal 2.16, p.A-3.

<sup>25</sup> Tahoe Reg'l Planning Compact, Pub. L. No. 96-551, Article IX, § (f).

infrastructure consistent with the region's Plug-In Electric Vehicle Readiness Plan should be phased in appropriately, and parking should be at a reduced or no fee for patrons utilizing those amenities. TTD should pursue partnerships with the casinos and other businesses in the casino corridor to maximize the most efficient use of existing parking infrastructure in the Tourist Core.

11-7  
cont.

**ii. The Project Presents a Timely Opportunity for the City of South Lake Tahoe and Douglas County to Rescind Outdated Minimum Parking Requirements.**

Both the City and Douglas County impose detailed minimum parking requirements on development.<sup>26</sup> Parking minimums are consistent with outdated regulations that incentivize reliance on the private automobile and can result in the creation of more spaces than necessary.<sup>27</sup> Removing parking minimums would advance the multi-modal objectives of the 2012 RTP, 2017 RTP, Long Range Transit Plan, and Active Transit Plan, encourage reliance on public transit and disincentivize reliance on private automobiles. In fact, an important part of improving a region's walkability and bikeability is incorporating measures that disincentivize reliance on private automobiles. Placer County recently recognized the importance of this strategy, confirming that "[i]t is in the public interest to minimize parking wherever possible to . . . encourage non-auto transit modes."<sup>28</sup>

11-8

Here, the loss of approximately 250 parking stalls from the construction of mixed use development would result in parking at the Heavenly Village Shopping Center to fall below minimum parking requirements, necessitating a detailed parking plan to inform revision of the Center's use permit.<sup>29</sup> By eliminating parking minimums in this case, the City would enable owners of existing and new private parking lots to open their lots to the public as paid parking at market prices, therefore encouraging a more efficient use of existing parking infrastructure. Similarly, by eliminating parking minimums in Douglas County, the casinos and resorts in the Tourist Core could effectively manage shared parking and generate revenue that could potentially be used to fund further transit service improvements. The City and Douglas County could implement this policy immediately and at no cost. Accordingly, the City and Douglas County should eliminate statutory parking minimum requirements or incorporate elimination of parking minimums into future area plans or area plan updates.

**d. The FEIR/EIS Should Include a Consistency Analysis with the Long Range Transit Plan.**

CEQA mandates a discussion of any inconsistencies between the proposed project and applicable general and regional plans.<sup>30</sup> The Guidelines indicate that the objective of this discussion is to identify possible modifications to the project to reduce any inconsistencies with relevant plans and policies. Here, the Long Range Transit Plan is identified as a "vision of the entire basin and surrounding areas from a transit perspective."<sup>31</sup> Accordingly, it is an applicable regional plan, and the DEIR/EIS should analyze and discuss any inconsistencies between the Long Range Transit Plan and the Project.

11-9

<sup>26</sup> South Lake Tahoe City Code § 6.10.410; Douglas County Code of Ordinances § 20.692.010.

<sup>27</sup> See *Searching for the Right Spot: Minimum Parking Requirements and Housing Affordability in New York City*, Furman Center for Real Estate & Urban Policy, New York University School of Law (2012) p.7.

<sup>28</sup> Placer County, North Tahoe Parking Study (Mar. 2015) p.57.

<sup>29</sup> Draft Env'tl. Impact Report/ Env'tl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) pp.3.6-82; 3.6-132.

<sup>30</sup> Cal. Code Regs., tit. 14, § 15125, subd. (d).

<sup>31</sup> TTD, Linking Tahoe: Transit Master Plan (Feb. 2017) p.2.

**2. The FEIR/EIS must Include Additional Analysis Regarding Traffic and Congestion in Connection With the Project.**

The League recognizes that TRPA is engaged in an ongoing effort to determine the most appropriate metrics for measuring traffic and congestion within the Basin. However, the DEIR/EIS improperly tiers from the 2012 RTP's environmental review (the "2012 RTP EIR/EIS"), relies on outdated traffic counts, and fails to correctly analyze potential trip increases and cumulative impacts resulting from the proposed Douglas County Events Center.

11-10

**a. The DEIR/EIS Improperly Tiers off the 2012 RTP EIR/EIS and Fails to Appropriately Analyze the Resulting Impacts on VMT from the Project.**

Although tiering is permissible in certain circumstances, CEQA requires an agency to analyze the project in its entirety to ensure all potential impacts related to the proposed project are properly considered.<sup>32</sup> Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan to an EIR for another plan of lesser scope, but the agency is not excused from adequately analyzing reasonably foreseeable significant environmental effects of the project.<sup>33</sup> One of the requirements of tiering is to inform the public that the agency is using tiering.<sup>34</sup>

11-11

Here, the DEIR/EIS relies on Section 15168(d) of the CEQA guidelines to argue that the 2012 RTP EIR/EIS serves as the program environmental document for the Project and, because the Project is included in the 2012 RTP project description, the Project is a "later part of" the 2012 RTP. The DEIR/EIS concludes that because this Project was included on the 2012 RTP list of projects and was contemplated in the 2012 RTP EIR/EIS, the Project will not contribute to a cumulatively significant impact to VMT per capita or regional air quality.<sup>35</sup> Therefore, the DEIR/EIS is effectively tiering from the 2012 RTP EIR/EIS.

This analysis is flawed and does not meet CEQA's requirements. First, the DEIR/EIS fails to notify the public that any tiering is occurring. Additionally, the 2012 RTP EIR/EIS only references the Project as part of a preferred transportation strategy package in the 2012 RTP EIR/EIS.<sup>36</sup> No analysis of the Project is provided in the 2012 RTP EIR/EIS. The Project Proponents are therefore not excused from adequately analyzing the reasonably foreseeable environmental effects of the Project related to VMT per capita and to air quality. Accordingly, the FEIR/EIS should include additional analysis regarding cumulatively significant impacts to VMT per capita and to air quality.

**b. The DEIR/EIS Relies on Outdated Traffic Counts and Should Include a Supplemental Traffic Analysis.**

Because it tiers from the 2012 RTP EIR/EIS for its VMT and air quality analysis, the DEIR/EIS utilizes outdated traffic counts. The 2012 RTP analysis utilized 2010 traffic counts for its VMT forecasts<sup>37</sup>, whereas 2015 traffic counts are now published by Caltrans and the Nevada Department of Transportation. The FEIR/EIS should therefore include

11-12

<sup>32</sup> *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 197-199.

<sup>33</sup> Cal. Code Regs., tit. 14, § 15152, subd. (b); *see also Atherton v. Bd. of Supervisors* (1983) 146 Cal.App.3d 346 (detailed evaluation of environmental impacts and mitigation measures may be deferred until later EIR is prepared to evaluate specific projects that will implement program).

<sup>34</sup> Cal. Pub. Resources Code, § 21094, subd. (e); Cal. Code Regs., tit. 14, § 15152, subd. (g); *Friends of the Santa Clarita River v. Castaic Lake Water Agency* (2002) 95 Cal.App.4th 1373, 1383-1384.

<sup>35</sup> Draft Env'tl. Impact Report/ Env'tl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) pp.3.19-4, 3.19-5.

<sup>36</sup> Draft Env'tl. Impact Report/ Env'tl. Impact Statement: Mobility 2035 Regional Transportation Plan / Sustainable Communities Strategy (Apr. 2012) p. 3.30-31.

<sup>37</sup> *Id.* at 3.30-10.

a supplemental traffic analysis to understand impacts from known traffic increases since the 2012 RTP EIR/EIS was released.

11-12  
cont.

**c. The DEIR/EIS's Related Project List Should Include the Proposed Douglas County Event Center.**

When assessing whether a new significant cumulative effect exists, CEQA requires the lead agency to "consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects."<sup>38</sup> Douglas County recently approved a one (1) percent increase in transient occupancy tax to fund the planned Douglas County Events Center (the "Events Center"), a 12,000 square foot building capable of accommodating up to 6,000 people.<sup>39</sup> The Events Center, which will be located at the corner of Lake Parkway and existing Highway 50, will be located squarely within the boundaries of the Project area, and has the potential to generate a significant amount of additional vehicle trips and eliminate parking spaces. The Events Center is therefore a proposed project that has become known to a local agency.<sup>40</sup>

11-13

The League recognizes that, due to the preliminary nature of the Events Center, such analysis may necessarily be somewhat speculative. However, sufficient information about the Events Center exists to "allow at least a general analysis of environmental impacts"<sup>41</sup> and to enable TTD to be proactive regarding potential impacts and associated transportation solutions. As a potential 6,000 seat entertainment venue, the Events Center would generate a significant amount of roadway and parking demand in the Project area. The League therefore renews its request for a transit pilot project within the Ski Run/Stateline town centers, as well as an associated parking management strategy that encourages travelers to park once and rely on convenient transit and other multi modal opportunities to travel into and around the Tourist Core.

**3. TRPA May Not Be Able to Make Required Findings That the Project is Consistent With the 2012 RTP.**

Local land use and development decisions must be consistent with the applicable general plan and regional plans.<sup>42</sup> "A project is consistent with the general plan "if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment."<sup>43</sup> Regional plans include regional transportation plans and regional land use plans for the protection of the Lake Tahoe Basin.<sup>44</sup>

**a. The Proposed Removal of Bike Lanes on Lake Parkway is Inconsistent With the 2012 RTP.**

11-14

Developing an effective (comprehensive, connected, safe) multi-modal transportation system is a paramount objective of the 2012 RTP. Prioritizing "constructing pedestrian and bicycle facilities in urbanized areas of the Region, facilities that increase connectivity of the pedestrian and bicycle network, and facilities that can be constructed with other projects" is a policy furthering TRPA's goal of creating a pedestrian friendly community.<sup>45</sup> Additionally, projects should "accommodate the needs of all categories of travelers by designing and operating roads for safe, comfortable, and efficient travel for roadway users of all ages and abilities, such as pedestrians, bicyclists, [and] transit riders."<sup>46</sup>

<sup>38</sup> Cal. Code Regs., tit. 14, § 15152 subd. (e)(2).

<sup>39</sup> See *Lodging Hike to Help Bring Event Center to Stateline* (Apr. 22, 2017), available at <http://www.tahoedailytribune.com/news/local/tot-hike-to-fund-entertainment-venue-in-stateline>.

<sup>40</sup> Draft Envtl. Impact Report/ Envtl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) p. 3.19-8.

<sup>41</sup> *Id.*

<sup>42</sup> *Families Unafraid to Uphold Rural etc. County v. Bd. of Supervisors* (1998) 62 Cal.App.4th 1332, 1336; Cal. Code Regs., tit. 14 § 15125, subd. (d).

<sup>43</sup> *Families Unafraid to Uphold Rural etc. County v. Board of Supervisors*, *supra*, 62 Cal.App.4th at 1336.

<sup>44</sup> Cal. Code Regs., tit. 14 § 15125, subd. (d).

<sup>45</sup> TRPA & TMPO, Reg'l Trans. Plan: Mobility 2035 (Dec. 2012), Policy 2.3, p.2-6.

<sup>46</sup> TRPA & TMPO, Linking Tahoe: Reg'l Transp. Plan (Apr. 2017), Appendix A, Policy 2.15, p.A-3.



The preferred alternative includes an option to restripe Lake Parkway, which would eliminate existing bicycle lanes on the roadway.<sup>47</sup> Removing existing bike lanes is in direct conflict with the goals and policies of the 2012 RTP regarding safe and comfortable travel for bicyclists, and, should the Project eliminate bike lanes on Lake Parkway, TRPA staff will not be able to make the required findings that this Project is consistent with the 2012 RTP. Further, the South Shore Area Plan retains strict environmental protections and includes several strategies to further accelerate environmental improvements and restoration, including the promotion of “redevelopment of existing developed areas to include increased bicycle, pedestrian, and transit amenities.”<sup>48</sup> The elimination of bicycle lanes within the South Shore Area Plan boundary is in direct conflict with these strategies. Accordingly, this Project should at all costs avoid eliminating existing bike lanes on Lake Parkway.

11-14  
cont.

**b. The Lack of Pedestrian Crossings in the Rocky Point Neighborhood is Inconsistent with the 2012 RTP and Requires Mitigation.**

The 2012 RTP’s multi modal transportation policies include the need to implement safety awareness signage, road markings . . . and programs that encourage bicycling and walking.”<sup>49</sup> Here, Alternatives B, C and D would create a five-lane roadway through the Rocky Point neighborhood that will result in unmitigated localized pedestrian safety impacts. Specifically, pedestrians walking from Montreal Road and Primrose Road to the Raley’s shopping center and other retail destinations will not be able to safely cross the new roadway because no marked crosswalks are planned for these locations.<sup>50</sup> Pedestrians wishing to cross here will be more likely to cross at the unmarked intersection than to detour by almost a third (1/3) of a mile to the Montreal Road/Heavenly Village Way signalized intersection. Further, the Montreal intersection would be located on a curve that would reduce pedestrian visibility. Accordingly, Alternatives B, C, and D would result in a significant pedestrian safety impact for the Rocky Point neighborhood and are not consistent with the goals and policies of the 2012 RTP.

11-15

To mitigate this impact and facilitate consistency findings, the League suggests installing a pedestrian hybrid beacon on the Loop Road between Pioneer Trail and Heavenly Village Way to enable pedestrians from the Rocky Point neighborhood to safely access nearby retail and shopping opportunities. This recommendation is timely and consistent with regional efforts to install multiple pedestrian beacons in and around the Basin.

**4. Any Restoration in Connection with the Disturbance of SEZ Should Take Place Within the Same Watershed.**

Mitigation Measure 3.16-2c requires the mitigation of “all impacts within the boundaries of SEZs by restoring SEZ habitat (land capability district 1b) in the surrounding area, or other appropriate area as determined by TRPA, at a minimum ratio of 1.5:1.”<sup>51</sup> Here, the Project will result in the removal of SEZ, mandating restoration. The League requests SEZ restoration that is preferably located within the same watershed, or comparable to the lands that will be lost. The restoration plan identified in Mitigation Measure 3.16-2c should be completed prior to acknowledgment of the Project permit.

11-16

Additionally, the DEIR/EIS fails to analyze compliance with California Fish and Game Code section 1602 (“Section 1602”). Section 1602 requires an entity to notify the California Department of Fish and Wildlife (“CDFW”) prior to commencing any activity that may substantially divert or obstruct the natural flow of any river, stream or lake, or substantially change or use any material from the bed, channel or bank of any river, stream or lake. The League requests confirmation that compliance with this section will occur.

<sup>47</sup> Draft Evtl. Impact Report/ Evtl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) p.3.3-17.

<sup>48</sup> Douglas County, NV, South Shore Area Plan (Sept. 2013) p.64.

<sup>49</sup> TRPA & TMPO., Reg’l Trans. Plan: Mobility 2035 (Dec. 2012), Policy 2.7, p.2-6.

<sup>50</sup> See Draft Evtl. Impact Report/ Evtl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project, Appendix B.

<sup>51</sup> Draft Evtl. Impact Report/ Evtl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) p.3.16-26.

## 5. TRPA's Air Quality Mitigation Fees Do Not Reflect Current Conditions and Should be Revised.

The reduction of "... air pollution which is caused by motor vehicles" is a primary objective of transportation planning in the Compact.<sup>52</sup> Mitigation measure 3.6-20 mandates the Project applicant to contribute funds to the Air Quality Mitigation Fund in accordance with Chapter 65 of the TRPA Code of Ordinances (the "TRPA Code").<sup>53</sup>

The TRPA Code and the Rules of Procedure require TRPA to "review the fee schedules . . . in light of the costs of needed improvements and the funds available to support those improvements and recommend adjustments to the fee schedules as appropriate."<sup>54</sup> In a Memorandum drafted by TRPA Staff dated September of 2007 (attached as Exhibit A hereto and incorporated by reference herein) TRPA acknowledges that mitigation fee increases generally occur every five years, concurrent with the review of the Threshold Evaluation.<sup>55</sup> To support the increase in fees, TRPA cites rising real estate values, as well as fuel and material prices.<sup>56</sup> Here, despite the fact that real estate values, as well as the cost of fuel and materials, have risen significantly since 2007, TRPA did not raise air quality mitigation fees in connection with the 2016 Threshold Evaluation. In fact, TRPA has not raised air quality mitigation fees in over ten years. Accordingly, and in conformance with internal policy and the Code of Ordinances, TRPA should revise its air quality mitigation fees to reflect current conditions prior to t Project approval.

11-17

## 6. TRPA and TTD Should Enter Into A Formal Agreement Regarding Roles, Responsibilities and Funding.

A project this size is necessarily complicated and requires a high level of coordination among agencies and decision makers. The League understands that such agreements are commonly executed between project applicants and TRPA for development of joint environmental documents. To that end, the League recommends that TRPA and TTD enter into a formal agreement or memorandum of understanding in order to effectively define roles, outline responsibilities, and detail how funding is allocated between the two organizations for implementation of this project. Such an agreement will not only facilitate an ongoing working relationship between the agencies with respect to this Project (and otherwise), but will also establish an important foundation for the upcoming bi-state consultation regarding transportation this fall. Accordingly, TRPA and TTD should enter into a formal agreement prior to the bi-state consultation.

11-18

## 7. Conclusion.

The League requests the inclusion of a transit pilot project as mitigation for this Project's contribution to a cumulatively significant impact on TRPA's ability to meet its VMT Threshold goals. Should the planned replacement housing be located outside of the Project Area, the League requests additional analysis and the inclusion of regular, reliable transit to/from such housing to the Tourist Core. This Project should also include and incorporate a comprehensive corridor-wide parking management strategy that leverages partnerships with the private sector for use of existing parking lots and prioritizes centralized paid parking with good wayfinding signage and electric vehicle infrastructure. The League further recommends that Douglas County and the City of South Lake Tahoe rescind outdated minimum parking requirements in connection with this Project and requests that the FEIR/EIS include a consistency analysis with the TTD's Long Range Transit Master Plan.

11-19

The FEIR/EIS must include additional analysis regarding traffic and congestion in connection with this Project. The DEIR/EIS improperly tiers off of the 2012 RTP, fails to appropriately analyze the resulting impacts on VMT from

11-20

<sup>52</sup> Tahoe Reg'l Planning Compact, Pub. L. No. 96-551, Art. V, subd. (c)(2)(b).

<sup>53</sup> Draft Env'tl. Impact Report/ Env'tl. Impact Statement: U.S. 50 / South Shore Cmty. Revitalization Project (Apr. 2017) p.3.6-135.

<sup>54</sup> TRPA Code of Ordinances § 65.2.5, subd. (D); TRPA Rules of Procedure § 10.8.5, subd. (A)(2).

<sup>55</sup> Memorandum from TRPA Staff to TRPA Governing Board (Sept. 2007) p.1.

<sup>56</sup> *Id.*

the Project and relies on outdated traffic counts and an incomplete project list for its VMT analysis. The League requests a supplemental traffic analysis that addresses traffic increases since the 2012 RTP EIR/EIS's release (utilizing 2015 traffic counts), as well as the inclusion of the Douglas County Event Center in the DEIR/EIS's related project list.

11-20  
cont.

In order to make required consistency findings under CEQA, bike lanes on Lake Parkway must not be removed and a pedestrian crossing should be installed to connect the Rocky Point neighborhood with the Tourist Core. The League requests that any restoration to compensate for the loss of SEZ occurs in the same watershed and that the restoration plan identified in Mitigation Measure 3.16-2c be completed prior to acknowledgment of the Project permit.

11-21

Finally, TRPA should revise its air quality mitigation fees to conform to current conditions and to comply with the TRPA Code and TRPA's internal policies. TRPA and TTD should also enter into a formal agreement regarding roles, responsibilities and the allocation of funding prior to the bi-state consultation this fall.

11-22

The League appreciates the opportunity to comment on these items. Should you have any questions or require any clarification regarding these comments, please do not hesitate to contact me.

Sincerely,



Marissa C. Fox, Esq.  
Senior Policy Analyst  
League to Save Lake Tahoe

## EXHIBIT A



## TAHOE REGIONAL PLANNING AGENCY

128 Markel Street  
Stateline, Nevada  
www.trpa.org

P.O. Box 5310  
Stateline, Nevada 89449-5310

Phone: (775) 588-4547  
Fax: (775) 588-4527  
Email: trpa@trpa.org

### MEMORANDUM

**Date:** September 2007

**To:** TRPA Governing Board

**From:** TRPA Staff

**Subject:** Amendment of Chapter 82, Water Quality Mitigation and Amendment of Chapter 93, Traffic and Air Quality Mitigation Program, to Raise the Mitigation Fees to Reflect Increased Cost of Construction

**Proposed Action:** TRPA staff is requesting the Governing Board move to adopt the following Code amendments for increases in the Air and Water Quality Mitigation Fees, and approve the finding of no significant environmental effect.

**Staff Recommendation:** Staff recommends that the Governing Board make the required findings and approve the proposed Regional Plan Amendments for fee increases.

**Required Motion(s):** To approve the proposed amendments, the Board must make the following motions, based on this staff summary and the evidence in the record:

- 1) A motion to approve the required findings (see Attachment A), including a finding of no significant effect; and 2) A motion to approve the proposed ordinance, subject to the conditions contained in the draft ordinance (see Attachment B).

In order for the motion to pass, a 4-4 vote of the Board is required.

**Project Description/Background:** Staff will present a summary of the proposed Regional Plan amendments resulting from the Draft 2006 Threshold Evaluation that are recommended adjustments to assist in Threshold attainment, specifically the air and water quality mitigation fees.

The TRPA Goals and Policies Implementation Element Chapter VII calls for mitigation for new development through air and water quality fees. This implementation is specified in the following code sections:

- Water Quality Mitigation Fee, Chapter 82.3 (see Attachment C)
- Air Quality Mitigation Fee, Chapter 93.3.D (see Attachment C)

**Issues/Concerns:** Mitigation fees increases have generally occurred every 5 years with the review of the Threshold Evaluation. New fees increases are necessary to offset the higher construction costs of EIP project implementation and the very large increase in property values. Since the last increase in 2002, real estate values for acquisitions and easements have risen substantially, as well as fuel and materials prices. Detailed explanation of the last increases can be found in the 2001 Threshold Report. The

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AGENDA ITEM XI.B

11-23

general formulas used are detailed in Attachment C. A reasonable approach to adjust to the rising costs of project construction is to apply the increase to both fees based on the California Construction Cost Index. The CCI was chosen as an inflationary index because the costs of construction are more applicable to mitigation projects than a consumers good index such as the CPI. The CCI also provides a more reasonable regional picture of costs than a national average.

11-23  
cont.

**Regional Plan Compliance:** The proposed ordinance is part of the Regional Plan, and therefore complies with all requirements of the TRPA Goals and Policies and Code of Ordinances, including all required findings in Chapters 6 (see attachment A for details).

If you have any questions about this agenda item, please contact Rita Whitney, Threshold Monitoring Program Manager at 775-588-4547 ext. 258 or [rwhitney@trpa.org](mailto:rwhitney@trpa.org).

**Attachments:**

Chapter 6 Findings and Ordinance 87-8 Findings (Attachment A)  
Draft Ordinance (Attachment B)  
Issues and Concerns Discussion (Attachment C)

**Letter  
11**

**League to Save Lake Tahoe**  
July 7, 2017

11-1

The commenter states they are dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin and they advocate for implementation of the Bi-State Compact, 2012 Regional Plan Update (RPU), Lake Tahoe Regional Transportation Plan and Sustainable Communities Strategy: Mobility 2035 (2012 RTP/SCS), and the Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy Horizon Year 2017–2040 (2017 RTP/SCS). The commenter requests the inclusion of transportation solutions that implement policies and directives from regional planning documents as part of the project, including transit service improvements, corridor-wide parking management strategies, and regular and reliable transit to and from the tourist core. The commenter also notes the timely opportunity for the City of South Lake Tahoe and Douglas County to rescind outdated minimum parking requirements.

As discussed on page 1-6 of Chapter 1, “Introduction,” and pages 3.6-51 through 3.6-54 in Section 3.6, “Traffic and Transportation,” of the Draft EIR/EIS/EIS, the project is included in and consistent with the 2012 RPU, the 2012 RTP/SCS, and the 2017 RTP/SCS. The project is also included in the Tahoe Regional Planning Compact. The study area is currently served by multiple transit service routes (see page 3.6-14), which would be enhanced as part of the project with improvements that include new bus stop shelters at existing bus stops (see Exhibits 2-2 through 2-4). Additionally, as described under Impact 3.6-4 and under “Cumulative Vehicle Miles Traveled Per Capita in the Region” in Section 3.19, “Cumulative Impacts,” implementation of the project would contribute to region-wide vehicle miles traveled (VMT) per capita decreases from improved non-motor vehicle mobility, such as the pedestrian overcrossing, cycle track, bicycle lanes, and sidewalks of the US 50/South Shore Community Revitalization Project, and the placement of a majority of new dwelling units within a town center as directed by the Lake Tahoe Regional Plan. As assessed in Appendix E and Impact 3.2-1 in Section 3.2, “Land Use,” of the Draft EIR/EIS/EIS the project is consistent with and implements policies included in the 2012 RPU and 2012 RTP/SCS related to transit, pedestrian, and bicycle mobility. For these reasons, the project achieves the project purpose, need, and objectives related to transit; helps implement the regional

plans referenced in this comment, including policies related to reducing per capita VMT; provides opportunities for reduced reliance on the private automobile; and enhances transit.

In addition to the roadway, pedestrian, bicycle, and transit improvements included in the project, TTD also has plans for enhancing transit service. The TTD Short Range Transit Plan and Linking Tahoe: Lake Tahoe Basin Transit Master Plan identify a variety of transit improvements, including improved signage for the Stateline transit center and improvements to frequency of transit services into and out of the study area and elsewhere throughout the South Shore area. Additionally, there would not be an increase in transit demand in 2020 (see Impact 3.6-6 on pages 3.6-57 through 3.6-61) and transit improvements are planned that would meet the increase in transit demand that could occur in 2040 from buildout of the mixed-use development sites (see Impact 3.6-16 on pages 3.6-115 through 3.6-118). Regardless, a pilot transit project that includes transit circulator service through the tourist core, as suggested in this comment, is a refinement included in the project, as described under the header, “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS.

Changing the City of South Lake Tahoe and Douglas County parking requirements for development and redevelopment would not be appropriate since these standards are not within the jurisdiction of any of the lead agencies for the project. Permanent impacts on parking are addressed in Impact 3.6-11 on pages 3.6-80 through 3.6-86. The project would remove some parking at Heavenly Village Center and Montbleu Resort and Casino; however, these businesses would continue to have sufficient parking to meet city and county standards. For parking impacts to the apartment complex and local businesses at the US 50/Pioneer Trail intersection affected by the realignment alternatives, the project would provide replacement parking equal to the number of spaces that would be lost within the footprint of the project. Additionally, the project would implement mitigation to prepare and implement a parking plan to offset the loss of parking that could occur if replacement housing and mixed-use development are constructed at Site 3 behind Raley’s (see page 3.6-132 of the Draft EIR/EIS/EIS). The project would prepare and implement a signage plan, which would include signs that direct people to parking and transit as well as other points of interest in the study area. For these reasons, there would be no additional requirement for the project to implement a corridor-wide parking management plan. Regardless, TTD is coordinating a parking agreement that includes commitments to transit access, public parking access in the state line tourist core area, and parking wayfinding signs that would be part of the US 50 project. Implementation of this parking strategy would occur prior to groundbreaking of transportation improvements.

The discussion under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” also describes that TTD has formalized its commitment to construct replacement housing within the project area watershed, with the preferred location within the proposed mixed-use development sites.

11-2

The commenter suggests that the Draft EIR/EIS/EIS uses outdated traffic counts and does not account for construction of the Douglas County Events Center under future scenarios; asserts that with the option to restripe Lake Parkway between Stateline Avenue and US 50 to accommodate summer concert traffic, which would preclude bicycle lanes and widened shoulders along this roadway segment, the project proponents would not be able to make the finding that the project is consistent with the RTP; and asserts that the lack of pedestrian crossings in the Rocky Point neighborhood is inconsistent with the RTP. Finally, this commenter recommends that any required SEZ restoration should be completed in the same watershed as the SEZ that is disturbed and requests the completion of the required restoration plan prior to acknowledgement of the project’s permit.

See the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS regarding the option to restripe Lake Parkway and its elimination from further consideration. See Response to Comment 11-15, below, regarding pedestrian access in the Rocky Point neighborhood.

As discussed on pages 3.6-10 and 3.6-11 of the Draft EIR/EIS/EIS, recent year 2013 traffic counts were obtained from the *Heavenly Mountain Resort Epic Discovery Project EIR/EIS/EIS* (Hauge Brueck Associates 2015) and validated against year 2015 Caltrans Performance Measurement System database counts for US 50 near the Stateline area. The 2013 traffic counts were found to be consistent with year 2015 Caltrans counts, generally within approximately one percent.

The Douglas County Events Center project is in the early planning stages and is currently undergoing environmental review, which was initiated subsequent to release of the Draft EIR/EIS/EIS. Project applicants for the Events Center have submitted an application to TRPA and a notice of preparation of an environmental document for the Events Center was released on January 5, 2018 (TRPA 2018). TRPA will review the application and associated documents to make sure the project is consistent with the zoning, list of permissible uses, and design standards contained in the adopted South Shore Area Plan and Douglas County Development Code. It is also understood that the Events Center planners intend to develop a traffic management plan that would involve scheduling events outside of peak traffic hours to enhance the arrival experience for event goers. The environmental review for the Events Center would need to demonstrate consistency with the South Shore Area Plan; it would be speculative to assume the Events Center would be inconsistent with these planning regulations. The design for the Events Center considers the US 50/South Shore Community Revitalization Project realignment alternatives, with and without a roundabout at the US 50/Lake Parkway intersection (TRPA 2018:3).

According to pages 2-12 and 2-13 of the *Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy Horizon Year 2017-2040* (2017 RTP/SCS), land use growth in the TRPA region, which includes the study area, is controlled by several factors, including projected redevelopment within community plans and area plans, such as the South Shore Area Plan. The growth projected in the Draft EIR/EIS/EIS, which includes 0.5 percent per year background growth and traffic from approved and pending projects, is consistent with forecasts contained in Table 18 of the 2017 RTP/SCS Initial Study/Mitigated Negative Declaration/Initial Environmental Checklist/Finding of No Significant Effect (2017 IS/MND/IEC/FONSE; TRPA 2017a:3-51 – 3-53), and would accommodate traffic associated with the Events Center.

SEZ restoration sites are limited within the Bijou Park and Edgewood Creek watersheds due to intensive urban development and hydrologic modification. For this reason, Mitigation Measure 3.16-2c, “Compensate for Unavoidable Loss of SEZ”, states that SEZ restoration areas would be located in the land surrounding the project site or in another appropriate area determined by TRPA. This flexibility allows TRPA to approve mitigation in the area where it would provide the greatest benefit. Regarding the timing of the restoration plan, the request for completion of the plan prior to permit acknowledgement is reasonable and in response, Mitigation Measure 3.16-2c has been revised in this final environmental document. The change is presented in Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures.” The correction does not alter the conclusions with respect to the significance of any environmental impact.

The third Bullet of Mitigation Measure 3.16-2c on page 3.16-26 of the Draft EIR/EIS/EIS is revised to read as follows:

The project proponent shall retain a qualified restoration ecologist to prepare a restoration plan that will address final clean-up, stabilization, and revegetation procedures for areas disturbed by the project. This restoration plan shall be completed and reviewed by TRPA prior to acknowledgement of the project's permit. The restoration plan for SEZs shall include the following:

- 11-3      The commenter requests that TRPA revise its air quality mitigation fees to better reflect current economic conditions and enter into a formal agreement with TTD regarding roles, responsibilities, and funding prior to the bi-state transportation consultation scheduled for fall of 2017. The commenter recognizes that this request is beyond the scope of the US 50/South Shore Community Revitalization Project. This commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
  
- 11-4      The commenter notes objectives to reduce reliance on the private automobile and establishment of a safe, secure, efficient, and integrated transportation system, which are included in the Tahoe Regional Planning Compact, 2012 RTP/SCS, and 2017 RTP/SCS. The commenter asserts that the proposed project provides an opportunity to improve transit service and implement a corridor-wide parking management strategy. See Response to Comment 11-1.
  
- 11-5      The commenter asserts that the project should improve transit service, implement mitigation measures that would address VMT impacts from the project, and implement a transit pilot project that provides increased, reliable summer service to and within the tourist core. See Response to Comment 11-2 and Master Response 1, "Adequacy of VMT Analysis."
  
- 11-6      The comment pertains to concerns related to potential increases in VMT and an increase in demand for transit that would occur if replacement housing were to be located outside of the study area. These concerns are resolved by TTD's commitment to construct replacement housing within the project site walkshed. See Response to Comment 11-1 and the discussion under the header "Project Refinements to Alternative B," in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS.
  
- 11-7      The commenter suggests the project include a corridor-wide parking management strategy as an effort to reduce reliance on private automobiles, which could include partnerships with casinos and other businesses in the casino corridor to maximize use of existing parking infrastructure in the tourist core and plug-in electric vehicle infrastructure. See Response to Comment 11-1.
  
- 11-8      The commenter notes the timely opportunity for the City of South Lake Tahoe and Douglas County to rescind outdated parking minimum requirements, which could advance the multi-modal objectives of regional plans and disincentivize reliance on private automobiles. See Response to Comment 11-1.
  
- 11-9      The commenter contends that the Draft EIR/EIS/EIS should analyze and discuss any inconsistencies between the Long Range Transit Plan and the project. The Long Range Transit Plan released by TTD in February 2017 includes phases for the development of the full transit network serving the Tahoe Basin as well as regional and trans-sierra connections and specific transit projects and improvements, such as improving wayfinding to the Stateline transit center and increasing frequency in transit service to and from the Stateline transit center that is within the tourist core. The plan also includes goals, objectives, and

performance measures that support improving transit in the Tahoe Region. The project would not impede implementation of the Long Range Transit Plan. In fact, the mixed-use development and replacement housing in the project area as well as improvements in the tourist core to enhance transit stops, walkability, and bicycle infrastructure support several goals and objectives of the plan related to compact development and increasing residential density along transit corridors with targeted services that support walking and bicycling. For these reasons, the project is consistent with the Long Range Transit Plan. See also Response to Comment 11-1 and the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action)” of this Final EIR/EIS/EIS.

- 11-10 The commenter suggests that the Draft EIR/EIS/EIS uses outdated traffic counts, improperly tiers from the 2012 RTP/SCS EIR/EIS, and does not account for construction of the Douglas County Events Center under future scenarios. See Master Response 1, “Adequacy of the VMT Analysis,” and Response to Comment 11-2.
- 11-11 The commenter asserts that the Draft EIR/EIS/EIS improperly tiers off the 2012 RTP/SCS EIR/EIS, does not appropriately analyze the VMT impacts from the project, and asserts that the 2012 RTP/SCS EIR/EIS only references the project as part of a preferred transportation strategy and no analysis of the project was provided. See Master Response 1, “Adequacy of VMT Analysis.”
- 11-12 The commenter asserts that because the VMT and air quality analyses tier from the 2012 RTP/SCS EIR/EIS, the Draft EIR/EIS/EIS relies on outdated traffic data published in 2010 and 2015 traffic counts are available from Caltrans and the Nevada Department of Transportation (NDOT). As described above in Response to Comment 11-2, the 2017 RTP IS/MND/IEC/FONSE analysis of VMT, which considered the project, did not result in a different conclusion about VMT impacts than those in the 2012 RTP/SCS EIR/EIS. Considering the VMT analysis in the 2017 RTP IS/MND/IEC/FONSE, while there may be more current traffic data available, analysis of the project’s impacts on VMT and air quality utilizing this data would not result in any new significant impacts. See Master Response 1, “Adequacy of VMT Analysis.”
- 11-13 The commenter notes that the proposed Douglas County Events Center next to Montbleu at the corner of US 50 and Lake Parkway could generate a substantial amount of additional vehicle trips and parking demand and would eliminate parking spaces. The commenter asserts this project should be added to the cumulative impact analysis. See Response to Comment 11-2.
- 11-14 The commenter asserts that with the option to restripe Lake Parkway between Stateline Avenue and US 50 to accommodate summer concert traffic, which would preclude bicycle lanes and widened shoulders along this roadway segment, the project proponents would not be able to make the finding that the project is consistent with the RTP. The commenter states that the project should avoid eliminating bicycle lanes on Lake Parkway. See Response to Comment 11-2.
- 11-15 The commenter suggests installing a pedestrian hybrid beacon on the Loop Road between Pioneer Trail and Heavenly Village Way to enable pedestrians from the Rocky Point neighborhood to safely access nearby retail and shopping. Physical division of the Rocky Point neighborhood and connectivity for residents through the neighborhood is addressed under Impact 3.4-1 beginning on page 3.4-17 of the Draft EIR/EIS/EIS; mitigation is included on page 3.4-36. The analysis notes:

The current average trip length for residents in this area (midpoint between Pioneer Trail and Heavenly Village Way) is 0.15 mile, and with Alternative B, it would increase to about 0.25 mile. This increased distance would in part be offset by the enhanced bicycle and pedestrian features (e.g., sidewalk and bicycle lane) along the realigned highway.

The incremental increase in pedestrian travel distance would be about 500 feet.

Alternative mitigation measures were considered to improve pedestrian access over or under US 50 connecting residents west of the realigned highway to adjacent commercial properties to the east; however, as stated on page 3.4-36 of the Draft EIR/EIS/EIS:

...this mitigation measure was dismissed because the raised pedestrian walkway or tunnel would require long approach ramps to meet Americans with Disabilities Act (ADA) requirements. The long approach ramps would likely require acquisition of additional properties and would not reduce the trip lengths for pedestrians.

Locating a mid-block crossing along realigned US 50, as suggested in this comment, would not be ideal, even with a pedestrian beacon. The location of the pedestrian beacon would be on a fairly high-speed roadway (the posted speed limit on realigned US 50 is anticipated to be 35 miles per hour [mph]), less than 1,000 feet from two signalized intersections, and in the middle of a curve. Additionally, the roadway is super elevated at this location due to the curvature of the road, so the crosswalk could not be made to meet ADA standards. Realigned US 50 would include bicycle lanes and sidewalk features similar to the existing Linear Park along US 50 near Tahoe Meadows (Exhibit 3.7-21 on page 3.7-52 of the Draft EIR/EIS/EIS), providing a safe and appealing walkway to one of the signalized crossings.

- 11-16 This commenter discusses Mitigation Measure 3.16-2c and restates the concerns described in Comment 11-2. The commenter requests that restoration of SEZ lands take place in the same watershed as the SEZ area that is disturbed and requests that the restoration plan required by Mitigation Measure 3.16-2c be completed prior to acknowledgement of the project permit. See Response to Comment 11-2.
- The commenter also contends that the Draft EIR/EIS/EIS does not analyze compliance with California Fish and Game Code Section 1602 and requests confirmation that compliance with this ordinance will occur. Fish and Game Code Section 1602 is discussed on pages 3.16-3, 3.16-15, and 3.16-26 of the Draft EIR/EIS/EIS. Also, Mitigation Measure 3.16-2b, “Conduct delineation of waters of the United States and obtain authorization for fill and required permits”, specifically addresses compliance with this ordinance.
- 11-17 The commenter asserts that TRPA should revise its air quality mitigation fees to better reflect current economic conditions. This commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 11-18 The commenter asserts that TRPA and TTD should enter into a formal agreement regarding roles, responsibilities, and funding related to implementation of the project. This commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 11-19 The commenter summarizes comments made earlier in the letter related to a transit pilot project, VMT threshold impacts, constructing replacement housing outside of the project area, a corridor-wide parking management strategy, parking standards, and a consistency

analysis with the Long Range Transit Master Plan. See Responses to Comments 11-1, 11-9, and 11-12, and Master Response 1, “Adequacy of VMT Analysis.”

- 11-20 The commenter suggests that the Draft EIR/EIS/EIS uses outdated traffic counts, does not address impacts to VMT, and does not account for construction of the Douglas County Events Center under future scenarios. See Response to Comments 11-2, 11-12, and Master Response 1, “Adequacy of VMT Analysis.”
- 11-21 The commenter summarizes comments made earlier in the letter related to bicycle lanes on Lake Parkway, a pedestrian crossing in the Rocky Point neighborhood, and SEZ restoration. See Responses to Comments 11-2 and 11-15.
- 11-22 The commenter summarizes comments made earlier in the letter related to air quality mitigation fees. This commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 11-23 The comment includes a 2007 memorandum from TRPA staff to the TRPA Governing Board requesting adoption of TRPA Code amendments for increases in air and water quality mitigation fees and approval of a finding of no significant environmental effect. This commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.





Letter  
12

Russ Nygaard  
Transportation Capital Program Manager,  
Tahoe Transportation District  
P.O. Box 499  
Zephyr Cove, NV 89448

June 30, 2017

Subject: Draft EIR, NEPA Draft EIS, and TRPA Draft EIS for the US 50/South Shore Community Revitalization Project (California State Clearinghouse #2011112009)

Dear Mr. Nygaard:

The Sierra Club, Tahoe Area Group (SCTAG) appreciates the opportunity to provide comments on the US 50/South Shore Community Revitalization Project ("Proposed Project"), also known as the "Loop Road" project, draft CEQA Environmental Impact Report, NEPA Environmental Impact Statement, and TRPA Environmental Impact Statement (hereafter "DEIR/S/S").

While the SCTAG supports projects which improve the environment and benefit the community, the proposed project is a massively-scaled project that will further urbanize the South Shore and soon incentivize *more* vehicle travel. Such a project, as well as the \$92 million price-tag, must be carefully and adequately analyzed and scrutinized. Unfortunately, the DEIR/S/S does not meet the NEPA, CEQA, or TRPA Compact requirements to thoroughly analyze the project's impacts. For example:

- The calculations regarding the vehicle miles traveled, Level of Service, and Daily Vehicle Trip Ends are not correct, and fail to utilize the best available transportation planning information;
- The scenic simulations are flawed and do not comport with the project description; and
- Contradictory information is deployed throughout multiple resource sections, including but not limited to the assessments of transportation, visual resources, noise, and economic impacts.

The attached detailed comments outline the technical inadequacies and provide recommendations regarding how the analysis can be corrected. While this letter focuses primarily on transportation, scenic, growth-inducing effects, and recreation (primarily regarding the Van Sickle Bi-State Park) impacts, we have also attached a summary table outlining the key concerns with the DEIR/S/S analysis of additional resource areas including noise, water quality, soil conservation, vegetation, affordable housing, and the application of federal De Minimis findings for Section 4(f).

I

While the DEIR/S/S acknowledges long-term significant and unavoidable impacts to scenic quality and visual character, community cohesion, and noise<sup>1</sup> from the proposed project (Alternative B<sup>2</sup>), the analysis fails to adequately analyze the impacts to a variety of other natural resource areas. Adequate technical analysis would clearly result in new and additional long-term significant and unavoidable impacts to: transportation, visual resources, noise, biological resources, community impacts (affordable housing), climate change, growth-inducing effects, and recreation. As a result, the DEIR/S/S, as it stands, does not provide the evidence necessary to support the environmental findings that the TRPA will have to make.

12-3  
cont.

Finally, the proposed project has been marketed to the community as providing a variety of environmental, social, and economic benefits - but a careful review of the DEIR/S/S indicates that many of the claims being made are simply not supported by the data. For example, the proposed project will:

- **not** improve long-term traffic flow or reduce vehicle miles traveled (VMT).
- **not** replace *all* affordable housing.
- **not** reduce net greenhouse gas emissions, and
- **not** improve the visual quality of the entire affected area.

12-4

The SCTAG looks forward to working with you to address these technical reparations and to evaluate beneficial project options that will support the achievement and maintenance of the TRPA environmental threshold standards. We would be happy to meet with you to discuss our concerns. Please contact Laurel Ames at [amesl@sbcglobal.net](mailto:amesl@sbcglobal.net) if you have any comments or questions.

Sincerely,



Laurel Ames,  
Conservation Chair

<sup>1</sup> Impact 3.7-1: Degradation of scenic quality and visual character, Impact 3.4-1: Physically divide an established community causing changes to community character and cohesion, and Impact 3.15-3: Traffic noise exposure at existing receptors.

<sup>2</sup> Our comments apply to Alternatives B, C, and D, where applicable, even if not specifically stated. In addition, comments on the technical adequacy of the analysis and significance conclusions apply to TRPA, CEQA, and NEPA conclusions, even if not specifically stated.

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## I. Project objectives:

The DEIR/S/S concludes the proposed project (Alternative B) best meets the project's objectives and labels it the "locally preferred" alternative.<sup>3</sup> However, the significance conclusions are based upon faulty technical analyses (detailed in these comments) and/or a failure to consider available alternative, less impactful means to achieving the objectives. In addition, CEQA requires the selection of an alternative which meets *most* of the basic objectives (15126.6). It is not necessary for a project to meet *every* objective. Given the extensive environmental, economic, and social impacts of the proposed project, and the substantial \$92 million-plus price tag to tax-payers,<sup>4</sup> extensive scrutiny is warranted, as is the consideration of alternative mechanisms to meet project objectives. The proposed project will forever change the South Stateline area, and affect the entire South Shore community and roadway network. It is imperative for decision-makers to have the best available information upon which to evaluate the project. As discussed in these comments, the DEIR/S/S fails to provide this for many resource impacts.

12-6

Below we provide a general review of the project objectives and list associated concerns regarding the project's potential to achieve each objective (detailed discussion and citations are included in following sections):

"□ reduce overall vehicle delays through improved motor vehicle mobility on the state highway system, including for commercial access and a better resident and visitor experience;"

Improving LOS will inevitably lead to more vehicle use. TTD, TRPA, and others should focus on other ways to address traffic issues, as discussed in the 2017 Regional Transportation Plan (RTP) and our associated comments (attached).

"□ decrease dependence on the use of private automobiles;"

There are other ways to help achieve this goal, plus given a significant extent of the traffic is related to day drivers only and visitors coming and going for their stay, significantly more transit resources are needed to address the impacts of visitor traffic.

"□ reduce the traffic volumes through the tourist core and "cut-through" traffic in adjacent neighborhoods, and develop a "complete street" for all users, including bicyclists, pedestrians, transit, and vehicles;"

Reducing traffic volumes through the tourist core is part of the aim to improve the walkability of the tourist core. As noted above, there are other actions that should be explored to reduce traffic volume. Further, the project may reduce "cut-through" traffic, however it does so by bulldozing through a part of the very neighborhood that currently experiences the cut-through traffic.

"□ improve visual and environmental conditions within the tourist core;"

<sup>3</sup> "Alternative B is identified as the locally preferred alternative." (DEIR/S/S, p. 2-22)

<sup>4</sup> "Mr. Hasty said the road construction including right-of-way acquisition and relocation cost is \$72 million. They are anticipating an additional \$20 million for the housing portion." From 10/26/2016 TRPA GB meeting; minutes p. 3

Improving the aesthetics of the urban environment should not be done at the expense of the more rural and natural visual environment outside of the tourist core (e.g. on Lake Parkway, at Van Sickle State Park,<sup>5</sup> etc.). Further, there are other ways to improve the visual quality of the urban downtown core than the proposed project.

12-9  
cont.

"□ improve connectivity, reliability, travel times, and operations of public transportation modes, including increased mobility and safety for bicycles and pedestrians and enhanced public access to Van Sickle Bi-State Park;"

These improvements can be achieved in a variety of ways; it is not necessary to expand roadway capacity to meet them. Further, the limited traffic on the existing Lake Parkway route east of the casinos is relatively light, and unlikely to prevent people from accessing Van Sickle. Other methods to improve walkability and access to the park can be implemented.

12-10

"□ make public transportation more effective with better visibility, connectivity, reliability, and travel times;"

These improvements can be achieved in a variety of ways; it is not necessary to expand roadway capacity to meet them. In fact, increased roadway capacity is a deterrent to increased use of public transportation.

□ comply with TRPA regional level-of-service criteria;

Although the project may improve LOS in the short-term, information shows that eventually, congestion will increase (see detailed transportation comments). Further, California has moved toward focusing on VMT as the metric used to identify transportation impacts, rather than LOS, because LOS has led to the expansion of roadway capacity and increased automobile use, among other impacts. In addition, it should be noted that TRPA is currently undergoing an extensive review of transportation metrics, including LOS. In a recent presentation to the Advisory Planning Commission (APC) by a transportation expert invited by TRPA, it was noted that over time, people become "acclimated" to greater delays. In fact, according to the transportation expert,<sup>6</sup> the delay times assigned to the LOS rankings have been adjusted up (such that the time period previously associated with each LOS ranking now allows longer delays) in the past for this very reason.

12-11

"□ facilitate the creation of a safe and walkable district that enhances pedestrian and bicyclist activities and safety and improves the City of South Lake Tahoe's and Douglas County's competitiveness with other regional and national tourist destinations;"

12-12

<sup>5</sup> Concern was also expressed by the Nevada Division of Environmental Protection's Governing Board representative during an informational hearing last fall: "He encouraged them to continue to work with State Parks because there is concern about the impacts of having a large redirection of traffic next to Van Sickle Bi-State Park." (Summary of comments by Jim Lawrence, 10/26/2016 Governing Board meeting, see minutes page 4).

<sup>6</sup> Ron Milam, Fehr and Peers, presentation to APC Transportation Measures Working Group on 6/14/2017.



There are other ways to improve the safety and walkability of the casino core area. In addition, the substantial visitation rebound from the US economic recession that has now occurred over the past two years<sup>7,8</sup> illustrates the area is already competitive with other tourist destinations.

12-12  
cont.

“ | create gateway and streetscape features that create a sense of place, align with complete streets principles, are reflective of Lake Tahoe’s natural setting, and provide effective way-finding;”

There are other ways to achieve this objective in place of an expanded roadway. In addition, Tahoe’s natural setting is currently reflected by the more rural and natural appearance of the forests along Lake Parkway and Montreal Road (so much so that a bi-state park was designated in that location – the Van Sickle Bi-State Park). The proposed project will increase the urban setting in that area, remove 100’s of large trees and replace them with a large retaining wall, wider roadways, and other urban features.

12-13

“ | provide opportunity for redevelopment and revitalization within the project site;”

There are other ways to achieve this objective. A bigger, wider road is not key to revitalization.

“□ provide replacement housing for all residential units acquired for highway right-of-way purposes before groundbreaking for transportation improvements; and”

The proposed project will not replace *all* housing for all displaced residents, as discussed in our comments. Further, in anticipation of this project, residents may already be facing evictions, lack of lease renewals, etc. by current property owners, such that housing is already being lost and those residents are not receiving the relocation assistance advertised as part of this project.

12-14

“□ result in no net loss of housing in the South Shore area.”

The proposed project will not replace housing for all displaced residents, as discussed in our comments.

*The EIR/S/S needs to correct the noted technical deficiencies in these comments and reevaluate the proposed project’s achievement of the stated objectives.*

## II. Transportation

### A. Project objectives related to transportation:

Historically, the original intent of the “Loop Road” project was to reduce vehicle congestion. However, over the past several decades it has become clear that increasing roadway capacity will lead to more driving (see detailed discussion and cites below). Conveniently, the project has now been assigned new objectives, migrating away from the sole focus on a road and instead claiming

12-15

<sup>7</sup> E.g. <http://www.tahoe-dailytribune.com/news/regional/snow-equity-from-2015-driving-winter-bookings-plus-another-record-setting-summer/>

<sup>8</sup> <http://www.sacbee.com/news/local/transportation/article149574509.html>

the benefits will come from a more pedestrian-friendly infrastructure. Although improvements facilitating walkable communities can provide environmental and economic benefits, the proposed project aims to spend over \$90 million on a transportation infrastructure project – a road – that will *increase* transportation impacts.

#### B. Impact conclusions related to transportation:

The DEIR/S/S concludes the following transportation impacts (those marked with an “\*” are discussed further in these comments):

- Impact 3.6-1: Impacts on intersection operations related to the redevelopment of the mixed-use development sites to accommodate replacement housing (Before Opening Day) \*
- Impact 3.6-2: Impacts of transportation improvements on intersection operations – 2020 (Opening Day) \*
- Impact 3.6-3: Impacts on roadway segment operations – 2020 (Opening Day) \*
- Impact 3.6-4: Impacts on vehicle miles of travel – 2020 (Opening Day) \*
- Impact 3.6-5: Impacts on bicycle and pedestrian facilities – 2020 (Opening Day)
- Impact 3.6-6: Impacts on transit – 2020 (Opening Day) \*
- Impact 3.6-7: Construction-related traffic impacts – 2020 (Opening Day)
- Impact 3.6-8: Impacts on vehicular, bicycle, and pedestrian safety – 2020 (Opening Day)
- Impact 3.6-9: Impacts on emergency access – 2020 (Opening Day) \*
- Impact 3.6-10: Construction-related parking impacts
- Impact 3.6-11: Permanent parking impacts
- Impact 3.6-12: Impacts on intersection operations – 2040 (Horizon Year) \*
- Impact 3.6-13: Impacts on roadway segment operations – 2040 (Horizon Year) \*
- Impact 3.6-14: Impacts on vehicle miles of travel – 2040 (Horizon Year) \*
- Impact 3.6-15: Impacts on bicycle and pedestrian facilities – 2040 (Horizon Year)
- Impact 3.6-16: Impacts on transit – 2040 (Horizon Year) \*
- Impact 3.6-17: Construction-related traffic impacts – 2040 (Horizon Year)
- Impact 3.6-18: Impacts on vehicular, bicycle, and pedestrian safety – 2040 (Horizon Year)
- Impact 3.6-19: Impacts on emergency access – 2040 (Horizon Year) \*
- Impact 3.6-20: Daily vehicle trip ends (DVTE) impacts – 2040 (Horizon Year) \*

12-15  
cont.

However, many of these conclusions are based on a flawed technical analysis, as discussed in detail below (not all impacts are discussed in detail, however all impacts affected by the flawed technical analysis will require reevaluation with appropriate data).

#### C. Increased roadway capacity

The proposed project will expand the capacity of the roadway in the project area by increasing vehicle speeds and extending the distance of the travel route along the new highway 50. Although the DEIR/S/S dismisses this impact by referring to the project as simply ‘managing’ traffic and not increasing the capacity, the fact is that by improving speed and adding more lanes to accommodate more vehicles (including increasing traffic lanes on Lake Parkway and Stateline Avenue),<sup>9</sup> as well as an increase in roadway length,<sup>10</sup> this is exactly the type of project that *increases* roadway capacity (detailed discussion and references below).

12-16

<sup>9</sup> “Alternative B would include restriping Stateline Avenue between Cedar Avenue and existing US 50 to include two southeast bound lanes to accommodate summer concert travelers exiting the Harvey’s parking lot... Additionally, Alternative B includes an option to restripe Lake Parkway on the lake side, between Stateline Avenue and US 50, to include four lanes. Lake Parkway is currently a three-lane roadway (one travel lane in each direction



### Increasing roadway capacity (including speeds) increases vehicle use:

It is well established that increasing roadway capacity, including through increased vehicle speeds, leads to more vehicle use (cites below), potentially within a matter of just a few years.<sup>11</sup> This is why California has been moving toward regulation of transportation impacts through VMT rather than LOS metrics. In fact, California specifically calls out the need to stop increasing roadway capacity, but so long as projects focus on meeting LOS, expanding roadway capacity will continue to be encouraged.<sup>12</sup>

While the DEIR/S/S purports that the project simply reconfigures existing traffic and speculates that the improved area will not be large enough to induce travel<sup>13</sup> (although contrary to this opinion is the Economic Assessment's<sup>14</sup> statement that "*total adjacent traffic volumes are predicted to increase above existing conditions under the 'Project Constructed' scenario,*"<sup>15</sup> the associated conclusion that visitors may increase by 20%<sup>16</sup> [discussed below], and anticipated overall increase in visitation to the project area by both visitors and residents<sup>17</sup>), the fact is that wider lanes and improved speeds will **increase** the capacity of the roadway. This is reflected by the DEIR/S/S's own conclusions that LOS will improve with implementation of the project, although the DEIR/S/S does not acknowledge the temporary nature of this improvement. In addition, increased roadway capacity is a deterrent to increased use of public transit, which is

12-16  
cont.

with a dedicated left-turn lane and wide shoulders) that is wide enough to accommodate this by restriping the roadway." (DEIR/S/S, p. 2-23)

<sup>10</sup> "Alternatives B, C, and D would result in lengthening the localized trip distance for through trips in the Stateline area for both eastbound and westbound traffic, because the distance around the tourist core is slightly longer than through the center of the core area (i.e., about 0.4 miles longer). This increase in route length would require vehicles on US 50 to travel a longer distance through the Stateline area, which would lead to a small increase in regional VMT." (DEIR/S/S, p. 3.6-52)

<sup>11</sup> "On congested urban roadways with significant latent demand, a major portion of additional roadway capacity tends to be filled with generated traffic and induced travel within a few years (Gorham 2009)." [Emphasis added]. <http://bca.transportationeconomics.org/benefits/induced-travel> (full cite below)

<sup>12</sup> "Mitigation for increased delay often involves increasing capacity (i.e. the width of a roadway or size of an intersection), which may increase auto use and emissions and discourage alternative forms of transportation." Updating Transportation Impacts Analysis in the CEQA Guidelines. Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (Steinberg, 2013), Governor's Office of Planning and Research, 8/6/2014.

<sup>13</sup> "A significant number of induced trips would not occur as a result of improved levels of service, because the project only involves a little over 1 mile of travel corridor and the difference in travel time would not be sufficient for motorists to decide that more trips should be taken. Also, regional induced trips would not occur, recognizing that the capacity of the overall highway system would not be changed as a result of the project, because the number of lanes and the intersection configurations on US 50 east and west of the project vicinity would be unchanged. Based on this assessment, it is reasonable to conclude that the 2020 (opening day) condition for Alternatives A and E would result in a less-than-significant change to the existing VMT; Alternatives B, C, and D would result in a VMT benefit, because of consistency with the RTP (TMPO and TRPA 2012a:3.3-50)."

<sup>14</sup> Final Report, Economic Analysis of the US 50/South Shore Community Revitalization Project, Economic and Planning Systems, Inc., June 7, 2013, hereafter "Economic Assessment."

<sup>15</sup> Economic Study, p. B-3

<sup>16</sup> "The potential increase in sales to visitors... would be achieved through a combination of a 20-percent increase in overall visitation to the South Shore..." (Economic Study, p. B-6)

<sup>17</sup> "...the type of walkable main street district that is envisioned for the project will complement the existing property extremely well, and have much to gain by the project if it can 1) entice an increase in visitation by creating a shopping and recreational district, and b) draw more local South Shore residents to the Stateline area..." (Economic Assessment, p. 53)

identified as a key objective of the 2017 Regional Transportation Plan (RTP)<sup>18</sup> and called out by the TRPA Bi-state Compact.<sup>19</sup>

12-16  
cont.

Further, the proposed project “may” include restriping to provide additional lanes on Lake Parkway and Stateline Avenue,<sup>20</sup> which would also increase vehicle use. The DEIR/S/S appears to downplay these impacts by suggesting these as “optional.” Under CEQA and NEPA a suggested future action must be fully analyzed in the EIR/S/S.<sup>21</sup> It is unclear whether these increases were incorporated into the transportation analysis.

12-17

The DEIR/S/S concludes that the project will not generate increases in daily trips or VMT,<sup>22</sup> and instead claims the project will result in beneficial LOS and VMT *per capita*. However, without addressing the increased trips that will be induced and generated by the project, this analysis is fatally flawed.

12-18

The DEIR/S/S also concludes that long-term traffic flow will improve in the area, which fails to account for the many studies showing that the reduction in congestion is temporary, and traffic eventually works its way back up to the previous levels of congestion through “induced travel” and “traffic generation (often within just a matter of a few years):”<sup>23</sup>

Key Research Findings:

- The quality of the evidence linking highway capacity expansion to increased VMT is high.
- Increased roadway capacity induces additional VMT in the short-run and even more VMT in the long-run.
- Capacity expansion leads to a net increase in VMT, not simply a shifting of VMT from one road to another.
- Increases in GHG emissions attributable to capacity expansion are substantial.
- Capacity expansion does not increase employment or other economic activity.
- Conversely, reductions in roadway capacity tend to produce social and economic benefits without worsening traffic congestion.

12-19

<sup>18</sup> “Increasing services at areas of known congestion and visitation “hot spots” is a key objective of the plan.” (2017 RTP, p. 3-9)

<sup>19</sup> Article V(c)(2): “The goal of transportation planning shall be: (A) To reduce dependency on the automobile by making more effective use of existing transportation modes and of public transit to move people and goods within the region...”

<sup>20</sup> “Alternative B would include restriping Stateline Avenue between Cedar Avenue and existing US 50 to include two southeast bound lanes to accommodate summer concert travelers exiting the Harvey’s parking lot... Additionally, Alternative B includes an option to restripe Lake Parkway on the lake side, between Stateline Avenue and US 50, to include four lanes. Lake Parkway is currently a three-lane roadway (one travel lane in each direction with a dedicated left-turn lane and wide shoulders) that is wide enough to accommodate this by restriping the roadway...” (DEIR/S/S, p. 2-23)

<sup>21</sup> 10565: “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” [Emphasis added]

<sup>22</sup> p. 3.6-104 and 3.6-127, resp.

<sup>23</sup> <http://bca.transportationeconomics.org/benefits/induced-travel/>; Also, “Induced demand fills up roads as fast as they’re built...” Caltrans Research Connection, 2004:

http://r.search.yahoo.com/\_ylt=A0LEViWMma1UL\_EAugPxoQ...\_ylu=X3oDMTBBybnV3cXQwBIDN1YwNzcgRwb3MDMgRjb2xvA2JmMOR2dGkAw--/RV-2/RE-1420691980/RO-10/RU-http%3a%2f%2fwww.dot.ca.gov%2fresearchconn%2fpast\_speakers%2fDrCrane%2ferane\_caltrans\_9-04.ppt/RK=0/RS=xYABXn0UpTUZOiM3YY2jKqiA6kw-;

- National Center for Sustainable Transportation<sup>24</sup>

A project that changes user travel costs (money or time) on a particular street, road, or transit route will motivate the following changes in traveler behavior:

- **Changes in route:** Users change their route from other facilities to an improved facility.
- **Changes in mode:** Users of other modes change their mode to take advantage of an improved facility.
- **Changes in time of travel:** Users change their time of travel to a more desired time due to the decrease in congestion.
- **Generation of new trips:** Users choose to make trips they previously would not have made, because travel costs are lower.

This is called *generated traffic*, referring to additional vehicle traffic on a particular road. This consists in part of *induced travel*, which refers to increased total vehicle miles travel (VMT) compared with what would otherwise occur (Litman 2001).

This additional vehicle travel tends to increase external costs (downstream congestion, parking subsidies, accident risk, pollution emissions) and provide additional user benefits, although these benefits tend to be small since it consists of the marginal-value vehicle travel that consumers most willingly forego when their time or vehicle operating costs increase slightly.

Virtually any roadway project that increases vehicle travel speeds or reduces travel costs can induce vehicle travel, including roadway expansion and traffic signal synchronization (Noland and Quddus 2006; TRISP 2005). On congested urban roadways with significant latent demand, a major portion of additional roadway capacity tends to be filled with generated traffic and induced travel within a few years (Gorham 2009). On the other hand, congestion pricing and improvements to alternative modes (such as high quality, grade-separated public transit that parallels a highway) can reduce traffic congestion without inducing additional vehicle travel. [Emphasis added]

- Transportation Economics Committee<sup>25</sup>

Notably, “external costs” referenced in this report would be incurred by other areas in the South Shore (e.g. more traffic on highway 50 through the Meyers area, which is already a problem during peak periods<sup>26</sup>). Further, reports by Caltrans’ own reviews document the need for Caltrans to understand that increasing capacity will induce travel:

“... *Changing the culture.* Beyond the mission, vision, and goals, a modernized Caltrans will require capacities and skills that now are lacking: to understand and manage demand (including demand induced by new transportation facilities...” [Emphasis added]

- Caltrans, Jan. 2014<sup>27</sup>

Numerous other studies and references support the concept of induced travel and generated traffic associated with increases in roadway capacity:

“The results strongly support the hypothesis that added lane mileage can induce significant additional travel.”  
- Noland, 2001<sup>28</sup>

<sup>24</sup> “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion.” Susan Handy, Department of Environmental Science and Policy, UC Davis. [http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST\\_Brief\\_InducedTravel\\_CS6\\_v3.pdf](http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf)

<sup>25</sup> <http://bea.transportationeconomics.org/benefits/induced-travel>

<sup>26</sup> <http://southtahoenow.com/story/03/05/2017/heavy-traffic-south-lake-tahoe-city-advising-motorists-stay-town-longer>

<sup>27</sup> “The California Department of Transportation: SSTI Assessment and Recommendations: State Smart Transportation Initiative.” January 2014 (p. 40). <http://www.dot.ca.gov/CIP/docs/SSTIReport.pdf>

12-19  
cont.

"When road capacity is increased, total travel time will ultimately equalize over time, until traffic moves at the previous levels of congestion."  
*– Campaign for Sensible Transportation*<sup>29</sup>

"Traffic congestion tends to maintain equilibrium. Congestion reaches a point at which it constrains further growth in peak-period trips. If road capacity increases, the number of peak-period trips also increases until congestion again limits further traffic growth. The additional travel is called "generated traffic." Generated traffic consists of diverted traffic (trips shifted in time, route and destination), and induced vehicle travel (shifts from other modes, longer trips and new vehicle trips). Research indicates that generated traffic often fills a significant portion of capacity added to congested urban road..."  
*– Littman, 2014*<sup>30</sup>

In fact, the TTD even acknowledges that adding roadway capacity will just lead to impacts later:

"[Widening highways] is too costly financially. It is too costly environmentally. That only buys you so much time, and then what?"  
*– Carl Hasty, TTD, 2017*<sup>31</sup>

In summary, there is no doubt that the project will induce trips and generate more travel. The EIR/S/S must be revised and the analysis correctly done to reflect current information regarding the outcomes of these types of projects. Efforts and resources should focus on the development of alternative mechanisms to achieve the other goals of the project. In sum, construction of the proposed project will run contrary to the best available transportation planning.

***The DEIR/S/S conclusions regarding LOS and VMT are based on improper information and an inadequate analysis. This must be corrected and the best available information used.***

#### **Contradictory claims regarding traffic:**

The conclusion that the project will not increase vehicle trips to the area does not comport with the advertised purpose and need for the project, and would raise questions about the expenditure of over \$90 million on a project that is therefore unnecessary.

- i. First, the DEIR/S/S claims there will be no induced regional traffic because the "capacity of the overall highway system would not be changed as a result of the project, because the number of lanes and the intersection configurations on US 50 east and west of the project vicinity would be unchanged."<sup>32</sup> If this were true, then it would indicate that any increases in traffic to the project area compared to existing conditions would be deterred due to the limited roadway capacity outside of the project area. This means:

<sup>28</sup> Robert. B. Nolan, 2001. *Relationships between highway capacity and induced vehicle travel*. Transportation Research Part A 35 (2001) 47 - 72. <http://www.sensibletransportation.org/pdf/noland.pdf>

<sup>29</sup> <http://www.sensibletransportation.org/induced/>

<sup>30</sup> Todd Littman, "Generated Traffic and Induced Travel," Implications for Transportation Planning, 2014. *Victoria Transport Policy Institute*;

[http://research.yahoo.com/vlt=A0LEViWMma1ULBAx8gPxQt\\_vlu=X3oDMTBzajE3bzE3BHNIYwNzegRwb3MDMTAEY29sbwNiZjEEdnRpZAM-](http://research.yahoo.com/vlt=A0LEViWMma1ULBAx8gPxQt_vlu=X3oDMTBzajE3bzE3BHNIYwNzegRwb3MDMTAEY29sbwNiZjEEdnRpZAM-)

<RV=2/RE=1420691980/RO=10/RU=http%3a%2f%2fvtipi.org%2fcentral/pdf/RK=0/RS=qblrb46iN5XicI2oKmtJgu5OIPmI->

<sup>31</sup> <http://www.sacbee.com/news/local/transportation/article149574509.html>

<sup>32</sup> DEIR/S/S, p. 3.6-52

12-19  
cont.

12-20

- There would be no increase in traffic associated with the No Action alternative through 2040 and therefore no need to implement the project to “reduce overall vehicle delays;”
- The 2040 intersection operation delay times presented in Table 3.6-2 for the existing traffic operations would not be any worse than the delays for the No Build alternative in Table 3.6-22 (but they are).

12-20  
cont.

ii. Second, if the project will not increase visitor traffic to the area (as claimed in the transportation analysis), then the following would apply:

- There would be no economic benefit from the project because there would not be any additional people coming to the area, yet the DEIR/S/S claims the project will provide such benefits from a combination of factors including a 20% increase in visitation (cited previously), and the Economic Assessment concludes that there would be a long-term increase in retail sales of \$16-25 million from drawing more visitors and residents to their businesses.<sup>33</sup>
- There would be no need to increase “competitiveness with other regional and national tourist destinations” because the number of visitors is already at its maximum and visitors are still coming to Stateline even without the project’s improvements.

12-21

These two factors alone would beg the question of why roughly \$92 million should be spent on this massive project if it will *not* reduce traffic compared to existing conditions and *not* improve the economic conditions in the area (aka “revitalize” the area).

However, this also begs the question of why a project that degrades the environment by removing a substantial number of trees, creating more pavement and stormwater runoff, degrading natural scenic views, creating more noise, and other impacts, plus displacing residents from their homes and businesses, should be constructed.

Under this scenario (that is, with no transportation or economic benefits), the only ‘benefit’ that might occur is the improvement of stormwater treatment facilities in some parts of the project area, but this work can be done at substantially far less cost and without the extensive impact to natural resources, the community, and taxpayers. The point here is that either the claims about not increasing traffic in the area (and associated economic benefits) are false, or the proposed project will spend \$92 million or more of primarily taxpayer funds to create substantial environmental, social, and economic damage with the only possible benefit being some water quality treatment facilities that, if improved on their own, would cost far less. **It seems far more likely that the DEIR/S/S claim that the project will not induce additional trips is merely an attempt to avoid analyzing the impacts of the increased vehicle trips (and thus, increased congestion and VMT). Considering that recent transportation information concludes that increasing capacity (which results from improving flow) leads to more traffic, this claim contradicts the best available transportation information. In short, the project will increase traffic.**

12-22

<sup>33</sup> “Increased retail sales will stem from increased levels of tourist visitation... and a higher capture of spending from local residents.” (Economic Assessment, p. 3)



*The EIR/S/S must correct these contradictory statements and perform an adequate analysis of impacts, as noted throughout this letter.*

12-22  
cont.

#### **Regional roadway impacts:**

As noted above, the proposed project will clearly lead to increased traffic in the area. Additionally, the DEIR/S/S aims to increase visitation to the project area. The Economic Assessment estimates a 20% increase from the proposed project and other measures. However, the DEIR/S/S provides no analysis of the impacts to other roadways from increased travel to the project area. The millions of visitors accessing the South Stateline (project) area<sup>34</sup> will enter the from two directions: highway 50 west and highway 50 east. Both of these roadways have limited capacity. As experienced during peak periods in 2015 through the present, roadways between Echo Summit and South Stateline have been clogged on many Sundays/Holidays as visitors to the area exit the Basin for their northern California homes.<sup>35</sup> It is clear that other roadway systems in the Basin cannot handle more traffic during peak periods, raising the question of what a 20% increase in visitation to the project area will do to these other roadways. Although some efforts to encourage non-personal automobile travel to the Basin remain ongoing, current ridership is dismal (less than 1% of daily trips<sup>36</sup>) and the 2017 RTP assumes a “base level” improvement of 5% transit ridership (the RTP notes a desire for higher ridership, however it will require substantial investments in transit and regional services that are not currently funded nor guaranteed).<sup>37</sup>

12-23

Further, even if traffic were to flow better in the project area, this does not address the impacts of the additional traffic on other roadways. Vehicles going to and from the project area will have to rely on the same existing roadway network, which cannot be expanded. This is likely to generate additional traffic problems (e.g. bottlenecks) elsewhere, such as on Pioneer Trail and highway 50 in the Meyers area and at the South Tahoe Y. The existing “regional analysis” of traffic is based on the erroneous assumption of a 0.5%/year growth rate<sup>38</sup> – which has already been proven too

<sup>34</sup> “The Region’s population of 55,000 full-time residents is dwarfed by the 10 million vehicles who come to enjoy Lake Tahoe’s crystal blue waters and surrounding alpine experience. The Region is also part of the rapidly growing Northern California and Nevada megalopolis, an area that extends from San Francisco to Sacramento and Reno and is home to more than 15 million people. Many of the residents in these metropolitan areas drive up to Lake Tahoe to enjoy its outdoor recreation opportunities, causing traffic congestion on the roadways that enter and exit the basin during peak times of visitation. With the lake as the predominant geographic feature at the Region’s center and the Region’s land area mostly in federal and state ownership, the transportation network is grounded in a predominantly 2-lane roadway system that rings the lake’s shore and cannot be expanded to meet growing traffic demands. Meeting the transportation demands of Lake Tahoe residents and a growing recreation visitor population will require unique and dynamic solutions.” (2017 RTP, p. 1-1)

<sup>35</sup> <http://tahoequarterly.com/best-of-tahoe-2017/seeking-traffic-solutions-tahoe>

<sup>36</sup> “Table 1.4: Trips made within the corridor (winter vs summer during high visitation periods)” summarizing conditions in the California/Nevada US 50 South Shore Corridor (2017 RTP, p. 1-24)

<sup>37</sup> “A series of targets have been created with the base case at 5% with a change in routing only, a more ambitious but achievable target of 10% with improvements in the medium term in the levels of service and in the long term with regional services. A transformation goal of 20% in the long term would require full implementation of the plan and changes in the use of personal vehicles to visit the basin.” (Lake Tahoe Transit Master Plan, 2017, p. 5).

<sup>38</sup> “Additionally, it was assumed that traffic on US 50 in the Stateline area would grow at a rate of up to approximately 0.5 percent per year, based on projections from the *US 50 Transportation Concept Report and Corridor System Management Plan* (Caltrans 2014a) and is consistent with the TRPA travel demand model. Additional growth in through traffic was assumed on top of the local growth as necessary to achieve an overall growth rate of approximately 0.5 percent per year on US 50 in the study area.” (DEIR/S/S, p. 3.6-23)

low by 2015 traffic counts (which show increases in the area between 2-12 percent over 2014, as discussed more below).

12-23  
cont.

*The EIR/S/S must assess the transportation impacts of the project on Tahoe's regional roadway network based on current trends and growth rates in the area.*

#### **Growth-inducing:**

A project is found to be growth-inducing if it fosters population or economic growth and/or removes a barrier to growth.<sup>39</sup> The proposed project will result in all three, as follows:

- *Population growth:* The additional 150 housing units and 40,000 sq. ft. of CFA included in the project will increase the population in the area.<sup>40</sup>
- *Economic growth:* The purpose of the project includes promoting the economic vitality of the area and the Economic Assessment estimates increased economic activity on the order of a 16-25% increase (p. 3).
- *Removal of barrier to growth:* Currently, new development will be limited when LOS standards are not being met, or are forecast to not be met (TRPA code 50.4.3.). Where LOS conditions are improved such that standards are met, TRPA's regional plan allows the agency to approve additional allocations for growth. In other words, existing congestion creates a barrier to growth; therefore, the (temporary) improvement in LOS that will result from the proposed project will lead to the removal of an obstacle to growth.

12-24

The DEIR/S/S concludes the project will not induce growth because it does not change the "planned development patterns in the region" nor "propose the expansion of existing transportation or transit routes, which would remove obstacles to growth in the region and influence growth through additional housing, population, and economic growth beyond that planned for in the Regional Plan." (p. 4-5). However, the project **will** expand the existing transportation network.

As noted elsewhere, the growth rate in 2015 already far exceeds the estimated annual growth rate of 0.5% used by TRPA's travel demand model, and 2016 traffic counts are likely to be even higher. Although the TRPA Regional Plan's (RP) "growth caps" are said to limit new residential units, CFA, and TAUs, TRPA does not currently limit the conversion of single family homes to vacation rentals (which operate as additional TAUs that have not been accounted for in the RP),<sup>41</sup> nor does it limit the number of 'day drivers' that visit the area. As recent information reflects, a substantial portion of peak traffic in the Basin is associated with visitors and day-drivers.<sup>42</sup> As the project will increase both beyond the RP's assumed growth rates, the project will influence growth "beyond that planned for in the Regional Plan."

<sup>39</sup> DEIR/S/S, p. 4-5

<sup>40</sup> DEIR/S/S, p. 3.4-12

<sup>41</sup> TRPA also released additional residential allocations in 2017 although it was recognized that many new homes are being used as vacation rentals (May 24, 2017 GB meeting).

<sup>42</sup> See previous cited to 2017 RTP, p. 1-1. Also, <http://www.laketahoenews.net/2017/06/data-visitors-clogging-lake-tahoe-roads/>

*The EIR/S/S must accurately evaluate and disclose the proposed project's growth-inducing effects.*

12-24  
cont.

**D. Assumptions regarding transit trip reduction for cumulative projects:**

**No evidence to support 10% reduction in trip generation:**

The transportation analysis applies a 10% reduction in trips from all cumulative projects in the area, yet no additional analysis, information, or evidence is presented to justify this reduction.<sup>43</sup> It appears that consultants 'speculated' that guests are not "likely" to drive to other local destinations once they are at their hotel. This affects the calculation of vehicle trips, LOS, and VMT.

In addition, the DEIR/S/S tiers from the 2012 RTP/SCS analysis, which includes the following estimated trip reductions:<sup>44</sup>

<b>Table 1. 2035 Vehicle Trip Reduction Estimates from TRIA</b>					
Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Urban Centers	2.66%	3.50%	4.32%	4.12%	2.78%
Other Area	1.28%	1.55%	2.19%	2.13%	1.40%
Internal to External & External to Internal Trips	0.78%	6.7%	0.78%	0.78%	0.78%

Source: TRIA Spreadsheet, TMPO, 2011

12-25

The DEIR/S/S does not explain why the trip reduction estimates for the cumulative project impacts in Appendix I are over twice as high as the estimates for Alternative 3 (the approved alternative) in the RTP/SCS analysis.

In addition, some of these projects are not located immediately within or adjacent to the project area. For example, Sierra Colina Village and the Lake Tahoe Beach Club are approximately a mile away from the project area – notably also from grocery stores, extensive retail, and other amenities. TRPA considers  $\frac{1}{4}$  to  $\frac{1}{2}$  mile as the maximum distance that supports non-auto access.<sup>45</sup> It is not appropriate to apply the same non-auto reductions to projects outside of these distances than those within these distances.

<sup>43</sup> "A 10% transit trip reduction was assumed as guests will likely not drive to other local destinations once at a hotel." E.g. App. I, TABLE 1B, NEAR-TERM (2018) AND LONG-TERM (2038) DEVELOPMENTS, TRIP GENERATION VOLUMES, p. 70.

<sup>44</sup> RPU DEIS, p. E.8-3.

<sup>45</sup> "For transit access, TRPA counts the percentage of recreation areas and overnight lodging facilities (including residences, hotels, and motels) that have a transit stop within one-quarter mile of the entrance. For bicycle access, TRPA counts the percentage of recreation and overnight lodging facilities that have a bicycle path, lane, or route within one-half mile of the entrance. For pedestrian access, TRPA counts the percentage of recreation and overnight lodging facilities that have a Class-I shared-use path or sidewalk within one-quarter mile of the entrance." (2017 RTP, p. 5-13).



*The EIR/S/S needs to correct the cumulative transportation analysis to apply evidence-based non-auto reductions to generated trips, and revise the LOS, VMT, and DVTE estimates accordingly.*

12-25  
cont.

#### E. VMT increases

##### Cites to 2012 RTP/SCS:

##### Traffic increases:

The DEIR/S/S dismisses its obligation to perform a thorough analysis of the transportation impacts (i.e. VMT and LOS) through a variety of references to the 2012 RTP/SCS and related documents, concluding that although the project will increase VMT, the impacts are acceptable because the project was included in the larger RTP/SCS plan which was found to provide VMT benefits on an overall basis.<sup>46</sup>

However, the baseline traffic counts, trends, and recent and future growth rates in the RTP analyses (2012 and 2017) are no longer applicable due to the recent increases in traffic. As with this DEIR/S/S analysis, the RTP analyses also relied on the travel demand model's 0.5% annual growth rate, which has been proven too low. In addition, recent growth has occurred even without the traffic added by cumulative projects (i.e. Edgewood Lodge, Zalanta, Gondola Vista, Sierra Colina, and the potential Edgewood Mountain Recreation Resort District).

12-26

Given that traffic growth rates have already exceeded 0.5%/year, it is reasonable to assume the completion of these cumulative projects will increase the growth even more. Further, the traffic analysis notes 1,400-1,700 additional vehicle trips from the proposed mixed use sites,<sup>47</sup> which will increase VMT.

*The EIR/S/S must make up for this deficiency by completing an adequate technical analysis based on current data, trends, and use of the most appropriate methodology.*

##### Project-level review vs. RTP/SCS programmatic level review:

The DEIR/S/S frequently refers to the inclusion of the project in the 2012 RTP/SCS and other documents, however the 2012 RTP/SCS EIS/R did not analyze the impacts of the proposed

12-27

<sup>46</sup> "Realignment of US 50 to create the opportunity for community revitalization in the Stateline/South Lake Tahoe tourist core is included in the approved RTP (originally named Alternative 3 in the *Lake Tahoe Regional Transportation Plan and Sustainable Communities Strategy Draft Environmental Impact Report/Draft Environmental Impact Statement* [RTP/SCS EIR/EIS]) and the RTP would have a net beneficial effect by reducing regional per capita VMT... The realignment, itself, would cause a small, localized increase in VMT for through traffic with Alternatives B, C, and D, because the route of US 50 would be slightly longer around the tourist core than through it; however, its mobility enhancements and support of planned development in an urban center would be consistent with attaining the regional total VMT threshold (as required by the Lake Tahoe Regional Plan and evaluated in the Regional Plan Update EIS)." (DEIR/S/S, p. S-33 to S-34)

<sup>47</sup> "The proposed new developments under Alternatives B, C, and D would all generate slightly more trips than the land uses they would replace (approximately 1,400 – 1,700 additional daily trips), which could potentially lead to a slight increase in regional VMT." (App. I, p. 45)

project; it simply included the project in a list based on whether funding was likely.<sup>48</sup> No analysis of the vehicle trips, VMT, or LOS impacts of the proposed project is included anywhere in the 2012 environmental documents. It appears that the assumption the project will provide transportation benefits has simply been carried forward for over forty years despite recent information to the contrary (see discussion regarding increased roadway capacity).

12-27  
cont.

*The EIR/S/S cannot rely on the project's mere listing in the 2012 RTP/SCS as a substitute for project-level analysis of impacts. The EIR/S/S needs to include an adequate traffic analysis to estimate the project's impacts on VMT.*

#### **VMT and increased roadway length:**

As discussed above, the state of California has recently shifted the focus of transportation planning to a primary emphasis on the Vehicle Miles Traveled (VMT) generated by projects (although this is regulated as per capita) instead of LOS. But in some ways, TRPA's standards are already ahead of the game because they regulate *total* VMT, recognizing that total VMT is what determines the impact to the Basin's natural resources. However, while California's efforts are often focused on managing the impacts of substantial increases in population, TRPA's requirements are intended to limit the total new growth so impacts do not exceed Lake Tahoe's environmental capacity.

As a result, planning in the Basin must address the total VMT impact of a project. While it is also important to regulate the per capita VMT to achieve statewide standards, this does not negate TRPA's responsibility to achieve the total VMT threshold, nor address the environmental impacts of any VMT increases. Yet the DEIR/S/S focuses on the project's inclusion in the RTP/SCS and its supposed achievement of per capita VMT standards *without even estimating the total VMT that will be generated in the project area* (let alone in the region as a result of induced travel and trip generation as discussed above). This is a violation of not only NEPA, CEQA, and TRPA environmental review disclosure laws, but also represents a significant failure to assess and disclose the project's impacts on TRPA's own threshold standards.

12-28

Specifically, the project will add 0.4 miles to the route. The DEIR/S/S discusses the increased roadway length, however fails to estimate and disclose the total increases. Further, this length exceeds the 0.3 mile maximum additional length that the California Governor's Office of Planning and Research (OPR) considers a cut-off point for where VMT increases may not occur. "Projects that would not likely lead to a substantial or measureable increase in VMT, and therefore should not require analysis, generally include: ...Any lane addition under 0.3 miles in length, including addition of any auxiliary lane less than 0.3 miles in length." (p. III-26 – 27, 2016<sup>49</sup>). In addition, induced VMT also includes a "multiplier" that describes the additional VMT resulting from an additional lane mile of roadway capacity added. In other words, for every increase in capacity of one mile, there is a concomitant increase in VMT such that the VMT increase may exceed one mile.<sup>50</sup>

<sup>48</sup> Table 2-1, RTP List of Projects Included in Transportation Strategy Packages A, B, and C. (2012 RTP DEIR/S, p. 2-25)

<sup>49</sup> [https://www.opr.ca.gov/docs/Revised\\_VMT\\_CEQA\\_Guidelines\\_Proposal\\_January\\_20\\_2016.pdf](https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf)

<sup>50</sup> "Most of these studies express the amount of induced VMT as an "elasticity," which is a multiplier that describes the additional VMT resulting from an additional lane mile of roadway capacity added. For example, an elasticity of

The following provides a conceptual and simplistic example of how the DEIR/S/S can estimate the increased VMT associated with the proposed project:

- Total trips through area on new US 50: 30,100 ADT<sup>51</sup>
- Additional VMT associated with use of new highway 50: 0.4 miles/trip

Additional VMT from new highway 50 (30,100 trips x 0.4 miles/trip) = 12,040 additional VMT/day

Apply “multiplier” as discussed above (not done as part of this example) to get total additional VMT

According to the 2015 Threshold Evaluation Report, the region was 5% shy of violating the VMT standard.<sup>52</sup> The most recent cumulative impact analysis incorporating anticipated VMT increases in the northern part of the Basin (which impact the regional VMT standard) estimated 2035 VMT to be 1,973,780.<sup>53</sup> This is just 57,158 miles below the VMT standard. The estimated VMT increases associated with the additional 0.4 miles of realigned road, as estimated above, would be 12,040 miles – 22% of the 57,158 mile ‘cushion’ before the VMT standard is violated. Further, the total VMT estimates in the TBAP, as well as the 2016 TER, are based on the 2014 baseline traffic year, and therefore do not incorporate increases that have likely occurred as a result of the increased traffic in recent years (cited elsewhere). The increase may have already caused the VMT standard to be violated, as a 2-12% increase in VMT (based on the increase in traffic in 2015 – see detailed discussion below) would result in total VMT between 1,975,811 – 2,169,518 – the latter of which clearly violates the standard of 2,030,938. Finally, as recently expressed by Carl Hasty, TTD, “*Tourism traffic is back...[this summer] may be the most crowded in a decade on Tahoe’s roads.*”<sup>54</sup> These increases are occurring **without** the proposed project and the other cumulative projects that will increase traffic in the area.

12-28  
cont.

***The EIR/S/S needs to analyze and disclose the increase in the total VMT associated with the proposed project.***

0.8 would signify a 0.8 percent increase in VMT for every 1.0 percent increase in lane miles. Many distinguish “short run elasticity” (increase in vehicle travel in the first few years) from “long run elasticity” (increase in vehicle travel beyond the first few years). Long run elasticity is typically larger than short run elasticity, because as time passes, more of the components of induced VMT materialize. Generally, short run elasticity can be thought of as excluding the effects of land use change, while long run elasticity includes them. Most studies find a long run elasticity between 0.6 and just over 1.0 (California Air Resources Board *DRAFT Policy Brief on Highway Capacity and Induced Travel*, p. 2.), meaning that for every increase in capacity of one lane-mile there is a concomitant increase in VMT of 0.6 to 1.0 lane miles. The most recent major study (Duranton and Turner, 2011) reveals an elasticity of VMT by lanes miles of 1.03; in other words, each lane mile built resulted in 1.03 additional miles of vehicle travel. (An elasticity greater than 1.0 can occur because new lanes leverage travel behavior beyond just the project location.) In CEQA analysis, the long-run elasticity should be used, as it captures the full effect of the project rather than just the early-stage effect.” (OPR 2016, p. III.29-30)

<sup>51</sup> Estimate used in Economic Assessment (Table B-3, p. B-4), sourced from Wood Rodgers Traffic Forecasting and Operations Analysis, 2009.

<sup>52</sup> “Status – At or somewhat better than target. In 2014, the most recent year where traffic modeling was available, there was an estimated 1,937,070 VMT, which is approximately 95 percent of the target.” (p. 3-60)

<sup>53</sup> See Alternative 1 forecasts, Table 19-5 Region-Wide Daily Summer VMT under Future Cumulative Conditions with Build-Out of Each Alternative, Tahoe Basin Area Plan and Tahoe City Lodge DEIR/S. Approved by TRPA January 2017, p. 19-17.

<sup>54</sup> <http://www.sacbee.com/news/local/transportation/article149574509.html>

**Local VMT impacts:**

The project also relies on regional VMT for the assessment and determination of significance, however fails to analyze the local VMT increases. As of 2014, traffic in the Douglas County portion had increased, and based on Caltrans counts for 2015, it is likely traffic has increased in both affected local jurisdictions (Douglas and El Dorado County).

12-29

*At a minimum, the EIR/S/S should disclose the local VMT and DVTEs for El Dorado County and/or the City of South Lake Tahoe and Douglas County; notably, the 2016 Threshold Evaluation Report summed traffic impacts by county (Table 12-15, p. 12-27)*

**Increased visitation:**

The project's Economic Assessment concluded the project would lead to a potential 20% overall increase in vehicles to the area. No information is provided to explain the dismissal of this increase in the EIR/S/S, which still refers to this Economic Assessment to support the conclusion of economic benefits from the project. In other words, the Economic Assessment concludes a significant increase in visitors to the area that will result in economic benefits, while the traffic analysis claims no increase in visitors from the project. As discussed previously, the EIR/S/S cannot have it both ways. Either the economic benefits have been overstated or the traffic impacts understated.

12-30

*The DEIR/S/S needs to clarify this information and ensure consistent data throughout the analysis.*

**Outdated baseline year:**

The DEIR/S/S uses 2014 traffic conditions and trends to reflect baseline conditions. We understand it is necessary to select an appropriate year and that such analyses cannot continue to be updated as the traffic assessment for the EIS/S/S requires time and resources, however given the significance of the proposed project, the substantial price tag, the extensive removal of homes and residences that will be required, and the many significant environmental impacts of this project, it is reasonable to expect the use of the best possible traffic data. The use of 2015 counts would have still provided almost eighteen months to complete the traffic analysis and include it in the EIR/S/S. As noted below, traffic counts in the project area have increased in recent years, which is not reflected in the EIR/S/S discussion regarding past reductions in traffic,<sup>55</sup> which were typically associated with the economic recession and therefore expected to be *temporary*. Alternatively, as noted below, the EIR/S/S can resolve this failure by incorporating recent trends and growth rates into the post-2014 analyses (e.g. for 2020 and 2040).

12-31

<sup>55</sup> "As seen from **Table 5**, traffic volumes on US 50 study segments have generally been decreasing over the last 22 years. Between 1992 and 2014, overall AADT on US 50 study segments between Pioneer Trail and just east of Stateline Avenue have decreased by 8,500-21,400 AADT (approximately 21%-47%), which is equal to a rate of approximately 1% to 3% per year. More recently, between 2006 and 2014, AADT volumes through the study segments between Pioneer Trail and just east of Stateline Avenue appear to have decreased by 3% to 23%, which is equal to a rate of approximately 0.5% to 3% per year." (App. I, p. 15)

*The EIR/S/S must reflect recent increases in traffic through either the use of an updated baseline year, or adjustments to the growth rate used in the analysis.*

Further, Table 5 in Appendix I lists traffic counts for locations within the study area, however notes that, "At certain locations, Caltrans and NDOT counts may have been actually conducted only once in every three years."

12-32

*The EIR/S/S needs to identify which locations are only counted every three years, as clearly substantial increases may occur over just one year's time but will be missed if counts are merely estimated or carried forward from previous years.*

#### Recent traffic growth:

While it is understandable that a baseline must be selected for an environmental analysis in advance of the release of the DEIR/S/S, there was ample time to incorporate traffic counts through at least 2015 in the DEIR/S/S, as well as include the growth in 2016 in the cumulative impact analysis. However, neither was done; instead, the EIR/S/S relies on a baseline year and trends which no longer apply. While traffic temporarily decreased, in large part due to the economic recession, traffic has significantly increased in recent years and is anticipated to continue this trend.<sup>56</sup> An examination of the 2015 road counts from Caltrans – which were available well before the draft EIR/S/S was released – indicates growth in traffic between 2.2 – 12% at the following intersections in the project area from 2014 to 2015 (counts imbedded below into Table 5, App. I, from Caltrans 2015 road counts):

Table 5 – US 50 Segments through Study Intersections - Recent Traffic Trends

Year	US 50 Two-Way Annual Average Daily Traffic (AADT) Volumes					
	Just west of Pioneer Trail	Between Pioneer Trail and Park Ave	Just east of Park Avenue	Just west of Stateline Ave	Just east of Stateline Ave	Just east of Kingsbury Grade
1992	40,000	47,000	46,000	34,000	31,100	n/a
1993	40,000	47,000	46,000	34,000	29,300	n/a
1994	40,000	47,000	46,000	34,000	29,070	n/a
1995	38,000	44,000	44,000	33,000	28,740	n/a
1996	35,500	41,000	44,500	33,000	27,900	n/a
1997	35,500	41,000	44,500	33,000	27,900	n/a
1998	35,500	41,000	44,500	33,000	26,700	n/a
1999	35,500	41,000	44,500	29,500	26,700	n/a
2000	35,500	41,000	44,500	28,000	27,800	n/a
2001	35,500	41,000	44,500	29,000	27,300	n/a
2002	35,500	41,000	34,000	33,000	27,600	n/a
2003	32,000	37,500	34,000	33,000	30,500	n/a
2004	32,500	37,500	33,500	33,000	30,800	n/a
2005	32,500	36,000	32,000	33,000	28,900	27,700
2006	32,500	35,500	29,000	30,500	26,500	23,700
2007	32,500	35,000	29,000	30,500	25,000	20,000
2008	31,500	33,000	28,500	28,000	25,000	20,000
2009	31,500	31,500	27,500	27,500	24,000	21,000
2010	31,500	28,500	26,500	26,500	24,000	22,000

12-33

<sup>56</sup> <http://tahoequarterly.com/best-of-tahoe-2017/seeking-traffic-solutions-tahoe>



2011	31,500	29,000	26,500	26,000	27,000	24,000
2012	31,500	29,000	26,500	25,500	22,500	21,000
2013	31,500	29,000	26,500	25,500	21,500	22,000
2014	31,500	27,500	24,600	25,000	21,500	25,000
2015		28,100	27,500	27,500		
% change 2014-2015		+ 2.2%	+ 12%	+ 9%		

Source: Caltrans and NDOT Traffic Volumes Publications  
Notes: At certain locations, Caltrans and NDOT counts may have been actually conducted only once in every three years. n/a = data not available  
\* Data taken from Caltrans 2015 Traffic Volumes at: <http://www.dot.ca.gov/trafficops/census/volumes2015/>

This reflects a substantial increase in traffic in just one year, and observations suggest traffic continued to increase in 2016, and is expected to increase even more in 2017. Although of significant importance, none of this current information is reflected in the DEIR/S/S.

In fact, the EIR/S/S traffic analysis assumes a 0.5% annual growth rate (App. I, p. 22) after the 2014 baseline year. The traffic increases that have already occurred since 2014 must be included, at a minimum, in the long-term and cumulative impact analyses. Thus, rather than assuming a 0.5%/year growth rate for the next 20 years of the plan, the EIR/S/S must incorporate increases from 2015 (at a minimum), which appear to be in the range of 2-12%. Further, the post-2014 increases must be reflected immediately; in other words, the 2-12% growth in 2015 cannot be spread out into the annual average rate and applied over the next twenty years as is done with the assumed 0.5% growth rate. By failing to account for post-2014 traffic conditions, the analysis fails to adequately analyze the long term and cumulative traffic impacts of the project.

In addition, the substantial increases in traffic in the last two years raises important questions regarding the appropriateness of the 0.5% per year growth rate assumed in the EIR/S/S. Further, these increases have occurred without the additional traffic that will be generated by the new Edgewood Lodge, Zalanta development, Gondola Vista,<sup>57</sup> Lake Tahoe Beach Club, or Sierra Colina projects.

*The EIR/S/S must reevaluate the annual growth rate used in the transportation analysis and apply a realistic growth rate to future impact determinations, as well as incorporate increases in 2015 and 2016 into the analysis. The EIR/S/S also needs to make adjustments to all related analyses impacted by increased growth of traffic, including noise, air quality, and water quality, as well as reevaluate the claims that the proposed project is necessary to increase visitors to the project area (increased visitation in recent years suggests otherwise).*

#### F. LOS impacts:

##### Increasing roadway capacity:

As cited previously, achieving LOS standards has often resulted in increases in roadway capacity and thereby contributed to increased vehicle use (and eventually, worsening LOS again). In addition, people acclimate to longer delay times such that the time associated with each LOS

<sup>57</sup> <http://www.laketahoenews.net/2016/06/condos-proposed-near-van-sickle-park/>

12-33  
cont.

12-34

category has actually been increased over the years (in other words, LOS standards were adjusted 'up' to allow longer delay times) because people were used to longer delays.<sup>58</sup> However, due to the TRPA Compact's requirements to protect Lake Tahoe and associated limits on development, the construction of new roads and/or increasing roadway capacity – both of which draw more traffic and eventually experience higher congestion levels again – is not an option.<sup>59</sup> Instead, efforts must focus on how to better manage and reduce impacts. The proposed project was first introduced decades ago as a means to reduce congestion, however that was before planners were aware that increasing roadway capacity would eventually lead to *more* traffic. It is therefore perplexing, given TRPA's understanding that roadway capacity cannot be increased in the Basin, that TRPA and the TTD are proposing a project that will do just that. As discussed previously in our comments, this runs contrary to the best available transportation and environmental planning information.

12-34  
cont.

LOS regulations are important for protecting Lake Tahoe's environment as well as public health and safety. Congestion affects the accessibility of emergency responders as well as potential evacuation operations during an emergency. Efforts and resources need to focus on implementing alternative methods, including significant increases in public transit and deterrents to use of the private automobile (see our attached 2017 RTP comments for more discussion and recommendations) to reduce vehicle use – both in the short- and long-term – and developing plans to prevent impediments during emergency situations.

*The EIR/S/S needs to reflect the best available transportation planning information and evaluate alternative options to reduce vehicle use and accommodate emergency responders and operations without expanding roadway capacity.*

#### **Local roadway impacts:**

While TRPA's VMT-based significance criterion focuses on the regional VMT in the Basin (although the location of VMT matters and should be evaluated at the local level), impacts to LOS are specifically *local* impacts. Therefore, LOS impacts will occur where new development within the project area is a result of the transfer of development from somewhere outside of the project area. For example, units that may be developed in the Edgewood Mountain Resort Recreation District (RRD) would be transferred in from development elsewhere. This would draw increased traffic specifically to the project area, creating additional LOS impacts. It is irrelevant whether LOS improves at the location the development is transferred from (aka "the sending site") because what must be assessed is the LOS within and surrounding the project area. Further, the traffic analysis notes 1,400-1,700 additional vehicle trips from the proposed mixed use sites,<sup>60</sup> which will impact local LOS in and around the project area.

12-35

*As a result, the EIR/S/S must evaluate the local LOS impacts that will result from any units that are added to the project area (e.g. affordable housing above and beyond that which is*

<sup>58</sup> Ron Milam, Fehr and Peers, presentation to APC Transportation Measures Working Group on 6/14/2017

<sup>59</sup> <http://www.trpa.org/monthly-column-working-together-to-improve-tahoes-transportation-system/>

<sup>60</sup> "The proposed new developments under Alternatives B, C, and D would all generate slightly more trips than the land uses they would replace (approximately 1,400 – 1,700 additional daily trips), which could potentially lead to a slight increase in regional VMT." (App. I, p. 45)

*replaced), and impacts associated with all cumulative and reasonably foreseeable projects in the area (e.g. Edgewood Mountain RRD, Gondola Vista). As alternative affordable housing locations are being considered at the South Lake Tahoe "Y,"<sup>61</sup> the EIR/S/S must also evaluate the potential impacts to intersections in between the Y and Stateline since employees will have to commute (although some portion may ride transit or bike, there will still be a net increase in vehicle trips).*

12-35  
cont.

#### **Transit improvements:**

The TRPA Compact states the goal of transportation planning is to "reduce dependency on the automobile by making more effective use of existing transportation modes and public transit," and the DEIR/S/S reiterates this directive.<sup>62</sup> The 2017 RTP identifies the need for transit improvements to reduce both resident and visitor traffic. Increasing transit ridership is an important means to reducing vehicle use and thereby reducing congestion. Resources are already being expended to improve transit systems, however far more funding is needed.<sup>63</sup> Yet even as improved transit is one of the key emphasis areas of the 2017 RTP, and the accompanying 2017 Transit Master Plan identifies the need to improve ridership, the proposed project does little to enhance transit. The DEIR/S/S concludes Alt. B will improve transit and result in wider shoulders, potential bus pullouts (notably not guaranteed or required), and some new bus shelters, although the locations of these improvements and the extent to which they will improve transit are not provided.<sup>64,65</sup> In addition, the DEIR/S/S concludes impacts to transit from the claimed improvements in traffic flow, however as noted above, the conclusion that the project will reduce traffic in the long term runs contrary to all evidence.

12-36

The DEIR/S/S also relies on the transit service expansions within the 2012 RTP/SCS (since updated by the 2017 RTP) to meet the demands from the new mixed use housing,<sup>66</sup> although the funding for the transit service expansions is not secured. Without assurance that the future transit

<sup>61</sup> "The Tahoe Transportation District is looking at the transit oriented development and opportunities that the local area plans allow. The TTD is also looking at other opportunities down near the Y." (Carl Hasty, TTD, at 5/24/2017 GB hearing, minutes p. 5).

<sup>62</sup> "As identified by the Compact, the goal of the transportation plan is to reduce dependency on the automobile by making more effective use of existing transportation modes and public transit." (DEIR/S/S, p. 3.6-2)

<sup>63</sup> "That leaves the Region with an \$3.8 billion funding shortfall over the next several decades to implement the fully envisioned system." (2017 RTP, p. 4-2)

<sup>64</sup> "Implementation of transportation improvements included in Alternative B would not alter existing transit circulation. Transit operations would be improved as a result of wider shoulders and the potential provision of bus pullouts, resulting in safer bus stop operations. The decreased traffic volumes through the tourist core anticipated under Alternative B would enhance safety and improve transit service by reducing travel times and delays associated with congestion in the area. Alternative B would also include the construction of new bus shelters at bus stop locations where existing features are limited to signs and, in some cases, benches." (DEIR/S/S, p. 3.6-58)

<sup>65</sup> "Transportation Improvements Alternative B transportation improvements would not alter existing transit circulation for the 2040 design year. Alternative B would enhance safety and provide improved transit service. Alternative B would also include the construction of new bus shelters at existing bus stop locations where features are limited to signs and, in some cases, benches. Alternative B would improve transit service within the study area. Furthermore, the project would be consistent with adopted policies related to transit systems. Therefore, Alternative B transportation improvements would result in a beneficial impact for the purposes of CEQA and TRPA." (DEIR/S/S, p. 3.6-115)

<sup>66</sup> "Thus, the mixed-use development was accounted for in the RTP/SCS EIR/EIS, and the proposed transit service expansions within that document would more than meet the demand anticipated under RTP buildout conditions." (DEIR/S/S, p. 3.6-116).



systems will actually be funded and operational, the DEIR/S/S cannot rely on uncertain future transit expansions to mitigate impacts. The proposed project also includes no mechanisms to help generate the additional funding needed to implement the recommended transit system, yet the proposed project will cost upward of \$92 million, representing a substantial investment by taxpayers and creating on-the-ground impacts that will forever change the project area. Such an investment should include improved transit as a *priority issue*.

*The EIR/S/S needs to evaluate the specific improvements to transit, including the location of new facilities and the extent to which they will improve transit. The EIR/S/S cannot rely on the 'improved speeds' from the project, as the technical analysis of such impacts is flawed and LOS will increase as the project generates additional trips (even if the DEIR/S/S analysis were correct, notably the estimated "improvements" in transit time are on the order of a few seconds and considered less-than-significant<sup>67</sup> – an amount that is unlikely to have much impact on ridership).*

12-36  
cont.

*The EIR/S/S also needs to evaluate methods for the proposed project to provide funding toward the transit improvements that are being relied upon to mitigate impacts. In fact, this substantial transportation project should include significant funding toward future transit needs. The EIR/S/S needs to evaluate existing traffic conditions, the timing of traffic growth, and the schedule in the 2017 Transit Master Plan and 2017 RTP and ensure mitigations are operational before traffic increases associated with the project occur.*

#### G. Daily Vehicle Trip Ends (DVTEs)

The EIR/S/S concludes no increase in DVTEs will result from the proposed project.<sup>68</sup> As noted previously, this contradicts current information regarding induced and generated traffic and the conclusions in the Economic Assessment, which estimate up to a 20% increase in visitors as a result of the project's implementation in combination with other recommendations included in the DEIR/S/S (e.g. recommendations regarding actions local businesses can take to improve visitation). Further, the traffic analysis notes 1,400-1,700 additional vehicle trips from the proposed mixed use sites,<sup>69</sup> which will impact DVTEs, VMT, and LOS.

12-37

<sup>67</sup> "Alternative A: No Build (No Project)

Similar to Alternative A in 2020, the projected increase in vehicular traffic through the study area would result in LOS degrading. The segment of US 50 between Pioneer Trail and Park Avenue would experience a reduction of speed as result, as shown below:

- Eastbound US 50 between Pioneer Trail and Park Avenue – average vehicular speed would degrade as follows:
  - Annual average peak hour: Reduction from 22.2 mph to 19.3 mph
- Westbound US 50 between Pioneer Trail and Park Avenue – average vehicular speed would degrade as follows:
  - Annual average peak hour: Reduction from 21.6 mph to 18.7 mph

The reduction in average mph anticipated with Alternative A would increase travel times along US 50, however, the overall increased travel time would be minimal. Thus, this would result in a less-than-significant impact for the purposes of CEQA and TRPA. For the purposes of NEPA, the design features of Alternative A would avoid or minimize the impacts on transit in 2040 such that no additional mitigation measures are needed or feasible to implement." (DEIR/S/S, p. 3.6-115)

<sup>68</sup> DEIR/S/S, p. 3.6-128

<sup>69</sup> "The proposed new developments under Alternatives B, C, and D would all generate slightly more trips than the land uses they would replace (approximately 1,400 – 1,700 additional daily trips), which could potentially lead to a slight increase in regional VMT." (App. I, p. 45)

*The EIR/S/S needs to evaluate the increase in DVTEs from the proposed project, which includes induced travel, trip generation, a net increase in housing units, and a net increase in CFA.*

12-37  
cont.

#### H. Cumulative traffic impacts:

The same flaws that affect the VMT and LOS analyses also infect the cumulative analysis of these impacts. In addition, the following cumulative impacts need to be addressed:

##### **Traffic associated with unregulated vacation rentals:**

Although the proposed project will not, itself, create new vacation rentals or contribute to the conversion of single family homes to vacation rentals, the local (area plan) and regional (basin-wide) increases in traffic associated with vacation rentals – which essentially operate as unregulated TAUs<sup>70</sup> – have not been adequately analyzed.<sup>71</sup> In fact, it is likely that some portion of the traffic increases experienced since 2014 are attributable to significantly increased popularity of vacation rentals through websites such as VRBO and Airbnb.

12-38

*The increased traffic associated with vacation rentals needs to be incorporated into the cumulative impact analysis, and impacts adequately incorporated into the assumed growth rate.*

##### **Edgewood Mountain Resort Recreation District:**

The cumulative impact analysis fails to address the potential increases in localized traffic from the Edgewood Mountain Recreation Resort District (RRD) land use. While the RP and DC SSAP require future development on this parcel to come from transferred development, the sending site is anticipated to be from outside of the local area,<sup>72</sup> drawing even more traffic into the project area. This specific, local impact has not been accounted for in the 2012 RTP/SCS, 2012 RPU, or 2017 RTP documents and therefore must be addressed as part of the EIR/S/S. In addition, the potential driveway/access road(s) and need for turnout lanes and signals associated with future development on the Edgewood Mountain RRD parcel should be discussed, especially if located on the new highway 50 route.

12-39

*The EIR/S/S needs to estimate the impacts of additional traffic from the Edgewood Mountain RRD on LOS, VMT, and DVTEs.*

<sup>70</sup> E.g. See League to Save Lake Tahoe comments to TRPA Local Government Committee, 5/10/2017.

<sup>71</sup> Discussion and recommendations included in our 3/22/2017 comments on the draft 2017 RTP (attached).

<sup>72</sup> “The 2012 TRPA Regional Plan also allows for tourist accommodations and commercial structures that are accessory to a recreation use to be located on the site, as long as development is transferred in from outside of the designated area and the transfer results in the retirement of development.” (Douglas County Master Plan, Land Use Element, p. 58)



Exhibit 2-1 Douglas County Resort Recreation Area Land Use Designated Area  
Source: 2012 TRPA Regional Plan Update, Final EIS, p. 2-4

12-39  
cont.

### Van Sickle Bi-State Park (VSBSP):

It is unclear whether the traffic generated by implementation of the 2006 Van Sickle Bi-State Park (VSBSP) has been incorporated into the cumulative analysis. The 2005 Master Plan estimated the Park would create an increase in 4,247 VMT (and 1,224 DVTEs) at build-out,<sup>73</sup> although the Master Plan identifies this as a rough estimate wherein additional analysis would be required.<sup>74</sup>

12-40

*The EIR/S/S should clearly identify how the VSBSP impacts have been addressed in the cumulative transportation impacts and/or revise the analysis accordingly.*

<sup>73</sup> "The project is expected to generate approximately 1,224 DVTE. Per TRPA regulations, therefore, a full traffic and air quality analysis is required...While the proposed project would increase regional Vehicle-Miles of Travel by 4,247, this level is considered to represent a significant increase." (VS BSP 2005 Master Plan Summary, p. 6)

<sup>74</sup> "[This] is only a preliminary traffic analysis. Therefore full evaluation of transportation impacts has not been performed." (VS BSP 2005 Master Plan Summary, p. 4)

**Gondola Vista:**

The access road and its associated impacts for the Gondola Vista development – beginning construction this year – it not reflected in the DEIR/S/S, although this is required as part of the proposed project according to the Gondola Vista project approval documents.<sup>75</sup>

12-41

*The EIR/S/S needs to accurately reflect the cumulative transportation impacts from Gondola Vista.*

**III. Visual Resources:****A. Project objectives:**

The project's objectives include to: "improve visual and environmental conditions within the tourist core." However, the visual improvements appear to focus primarily on the existing urban environment of buildings along highway 50, and such improvements will be done so at the expense of the adjacent, less developed natural areas along the proposed new highway 50 route (e.g. VSBSP).<sup>76</sup> Improvements to the urban areas, such as redevelopment of unsightly buildings, landscaping, etc., can be done without rerouting and expanding the highway, as evinced by the Heavenly Village/Marriot project.

12-42

**B. Impact conclusions:**

The DEIR/S/S concludes the following visual resource impacts from the proposed project:

Impact 3.7-1: Degradation of scenic quality and visual character (SU<sup>77</sup>)

Impact 3.7-2: Interference with or disruption of scenic vistas or scenic resources (LTS)

Impact 3.7-3: Increased light and glare (LTS)

12-43

The DEIR/S/S conclusions are based on a flawed and inadequate technical analysis, as discussed in detail below. Further, the SU determination for Impact 3.7-1 is based on the impacts to the residential neighborhood between Montreal Road and Pioneer Trail;<sup>78</sup> negative impacts to the natural areas east and northeast of the existing Lake Parkway and Montreal Road, including the VSBSP, are not adequately assessed nor considered. In fact, as discussed below, the DEIR/S/S

<sup>75</sup> "In general, the Van Sickle project would be compatible with the US 50 project, as currently envisioned. It should be noted that the US 50 project is presently at a very conceptual level, and changes in alternatives will undoubtedly occur through the environmental and detailed design processes. Furthermore, this project is not assured, and is at least eight years from implementation. As such, it is not appropriate to condition the Van Sickle project to reflect possible future impacts associated with the US 50 proposals. Rather, the US 50 project, if implemented, would be responsible for addressing any minor roadway modifications necessary to accommodate all adjacent land uses as plans become finalized." (Gondola Vista [previously "Van Sickle Property Development"] Traffic Analysis, App. A, Negative Declaration and Initial Study, October 2005, p. 4).

<sup>76</sup> "East Lake Parkway between Park Avenue and U.S. 50 traverses an area that is urbanized to the west and a natural landscape to the east (coniferous forests and portions of Van Sickle Bi-State Park and Heavenly Valley Mountain are visible)." (App. G, Visual Impact Assessment, p. 40) [Emphasis added]

<sup>77</sup> Significant and unavoidable

<sup>78</sup> "Effects on visual character associated with Alternatives B, C, and D within the residential neighborhood between Montreal Road and Pioneer Trail." (DEIR/S/S, p. S-47)

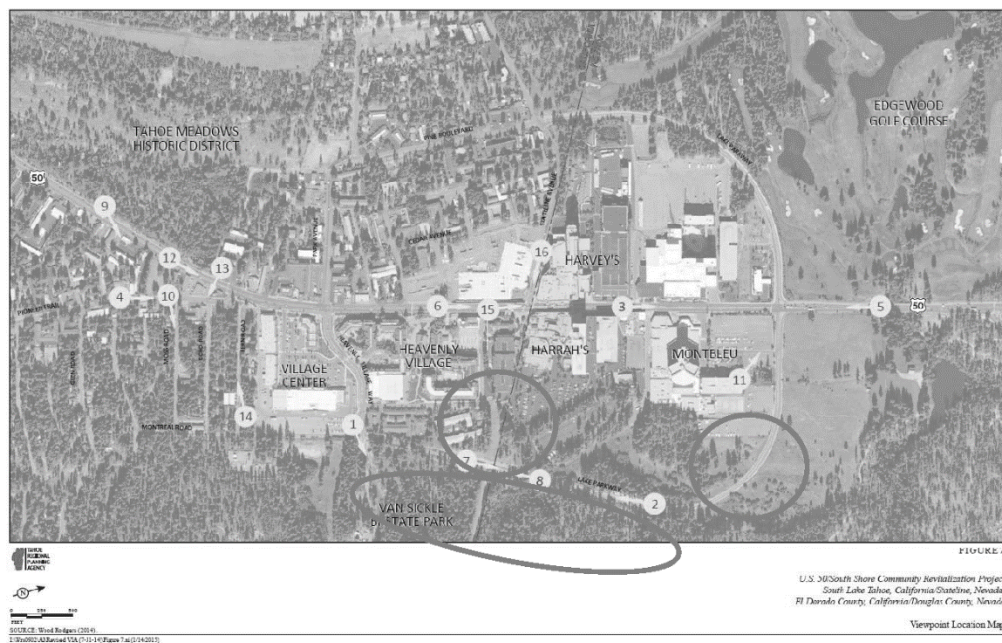
notes a *decrease* in visual quality associated with the limited viewpoints that were analyzed in these areas, yet the protection of natural scenic resources should be prioritized above improvements to the urban areas.

12-43  
cont.

### C. Degradation of scenic quality and visual character:

#### Selection of viewpoints:

Appendix G contains the Visual Impact Assessment (VIA) completed for the proposed project. The Viewpoint Location Map on page 42 (inserted below) notes the viewpoints analyzed in the VIA:



12-44

There are far more viewpoints selected in the urban areas than the natural areas where emphasis should be placed.

*For example, the EIR/S/S should include the following viewpoints (the recommended general vicinity is identified with red circles in figures above and below):*

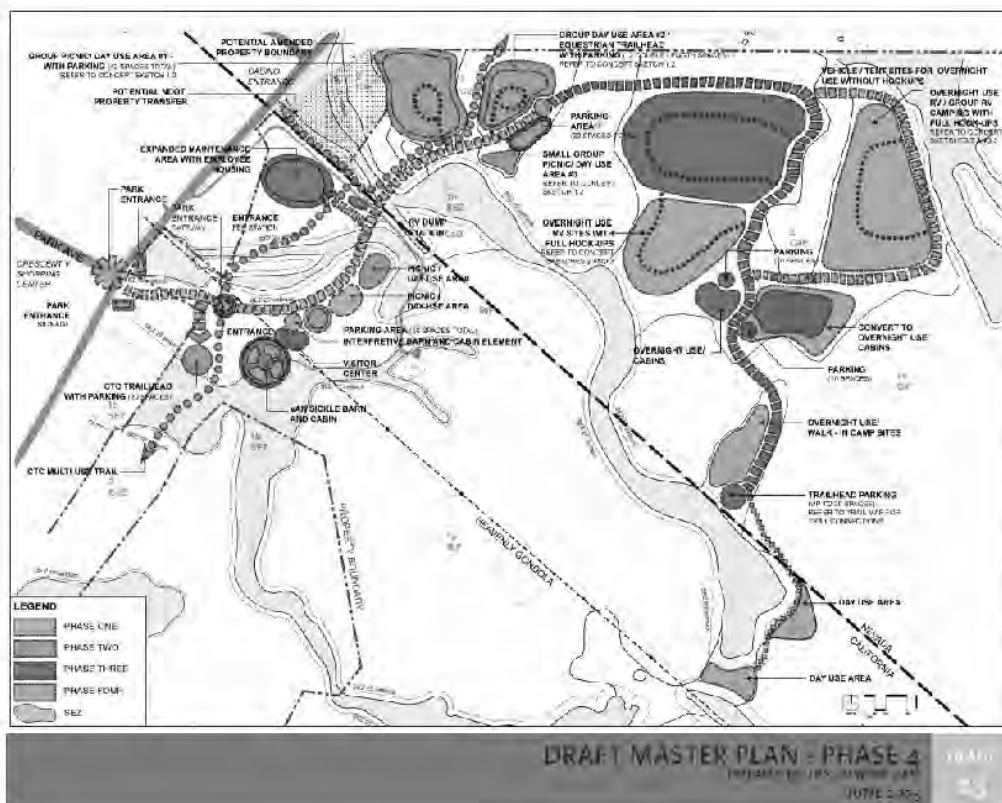
- Multiple locations from the Heavenly Village and along the proposed pedestrian path looking “up” the mountain toward VSBSP (which would involve looking across the new highway). The document notes viewers include residents, tourists, pedestrians, and retail owners – all of whom will experience this view, which will be degraded by a significantly widened highway, more urbanized structures, fewer trees (to accommodate

29



the widened highway<sup>79</sup>), a pedestrian overpass, an 18' retaining wall, and other visually-degrading features;

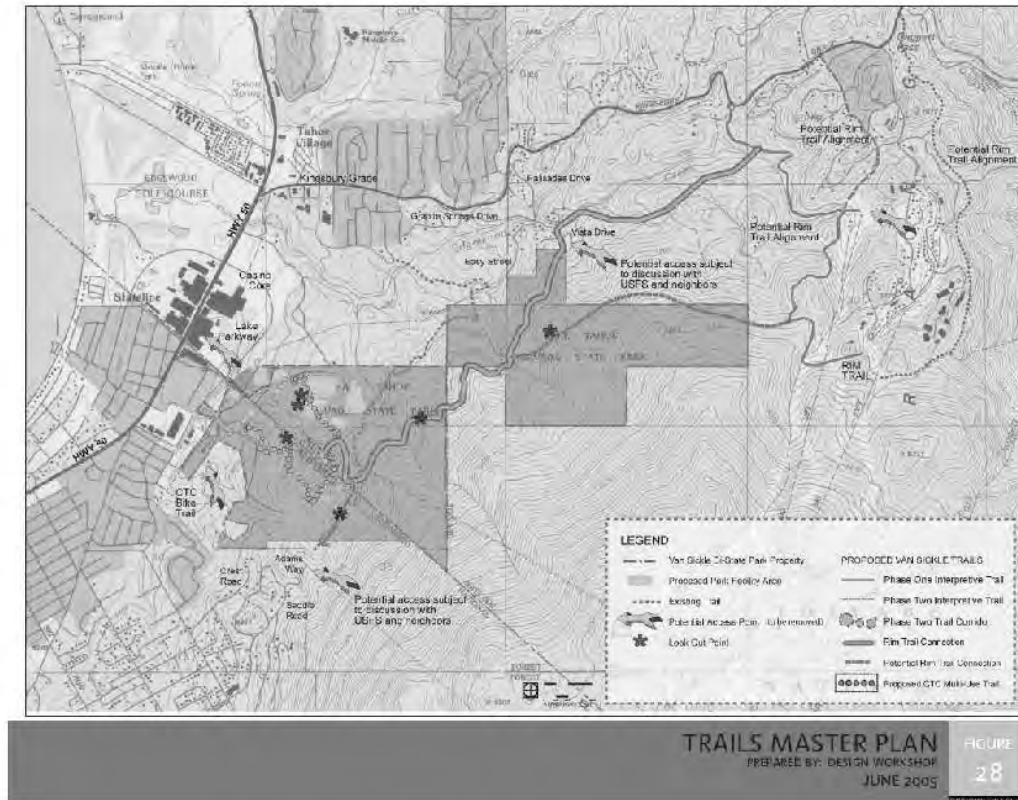
- From the existing Lake Parkway driving east around the corner where one first sees views across Lake Tahoe; and
- From within VSBSP looking toward the new highway route and along current and proposed trails that connect to the Tahoe Rim Trail (excerpted images from 2005 VSBSP Master Plan below) and other locations within the VSBSP where the project area can be observed.<sup>80</sup>



12-44  
cont.

<sup>79</sup> See proposed tree removal in Appendix L.

<sup>80</sup> "Views of Van Sickle Bi-State Park are visible to motorists, pedestrians, and bicyclists traveling in the Project area along Montreal Road/Lake Parkway. Views of the proposed Project area are visible from higher elevation areas in the Lower and Upper Park of Van Sickle Bi-State Park. Considering that Van Sickle Bi-State Park is adjacent to and has similar features and amenities as the TRPA's Recreation Area Number 37: Heavenly Valley, the existing visual quality rating would be similar to that of Heavenly Valley." (App. G, p. 81)



12-44  
cont.



Image from Google Earth; VSBSP on top

**Visual impacts to natural resources:**FHWA Assessment:

The DEIR/S/S concludes the proposed project will improve the visual quality rating of urbanized areas, however this is done at the expense of the visual quality of *natural* areas. The TRPA Compact specifically calls for the protection of Tahoe's unique *natural* resources (Article I). Urban development can always be replaced/improved, whereas when natural views are destroyed, they are lost forever. TRPA should prioritize the protection of natural scenic resources above the urban environment, and focus on alternative means to improve the urban areas that do not degrade natural areas.

However, the proposed project does just the opposite. The Visual Impact Assessment in Appendix G concludes a negative impact to visual quality at three viewpoints for Alternatives B-D – viewpoints 2, 7, and 8 – all of which are located along the existing Lake Parkway in natural areas and adjacent to the VSBSP. These impacts are not reflected in the general summaries of total visual impacts, which do not distinguish between natural and urban views.<sup>81</sup>

Table E: Visual Quality Assessment Summary (View from Road and View of the Road)

Viewpoints	Existing/Alternative A Visual Quality Rating	Alternative B Visual Quality Rating/(Score Difference between Existing Conditions and Alternative B)	Alternative C Visual Quality Rating/(Score Difference between Existing Conditions and Alternative C)	Alternative D Visual Quality Rating/(Score Difference between Existing Conditions and Alternative D)	Alternative E Visual Quality Rating/(Score Difference between Existing Conditions and Alternative E)
Viewpoint 1	3.06	3.67 / (+0.61)	3.67 / (+0.61)	3.67 / (+0.61)	N/A
Viewpoint 2	4.61	3.61 / (-1.00)	3.61 / (-1.00)	3.61 / (-1.00)	N/A
Viewpoint 3	2.67	3.56 / (+0.89)	3.56 / (+0.89)	3.56 / (+0.89)	N/A
Viewpoint 4	2.06	3.50 / (+1.44) <sup>1</sup>	3.50 / (+1.44) <sup>2</sup>	N/A	N/A
Viewpoint 5	2.50	2.56 / (+0.06) <sup>3</sup>	2.83 / (+0.33) <sup>4</sup>	2.56 / (+0.06) <sup>3</sup>	N/A
Viewpoint 6	3.00	3.06 / (+0.06)	N/A	3.06 / (+0.06)	N/A
Viewpoint 7	4.33	3.22 / (-1.11)	N/A	3.22 / (-1.11)	N/A
Viewpoint 8	4.06	3.28 / (-0.78)	N/A	3.28 / (-0.78)	N/A
Viewpoint 9	3.00	3.00 / (0.00) <sup>5</sup>	3.00 / (0.00) <sup>6</sup>	N/A	N/A
Viewpoint 10	2.11	4.28 / (+2.17) <sup>7</sup>	4.28 / (+2.17) <sup>8</sup>	N/A	N/A
Viewpoint 11	5.00	5.00 / (0.00) <sup>9</sup>	N/A	5.00 / (0.00) <sup>9</sup>	N/A
Viewpoint 12	3.22	N/A	N/A	3.33 / (+0.11)	N/A
Viewpoint 13	3.56	N/A	N/A	3.89 / (+0.33)	N/A
Viewpoint 14	3.06	N/A	N/A	3.67 / (+0.61)	N/A
Viewpoint 15	2.17	N/A	N/A	N/A	1.83 / (-0.34)
Viewpoint 16	2.72	N/A	N/A	N/A	2.33 / (-0.39)

<sup>81</sup> "Table M: FHWA Analysis Summary provides a summary of the change in visual character and visual quality each Alternative would have on the studied viewpoints." (DEIR/S/S, App. G, p. 158)

12-45



Source: LSA Associates, Inc. April 2014. Individual worksheets are located in Appendix B

Notes: Simulated Visual Quality Rating is followed in parentheses by the quantified change in the Visual Quality Rating. Bolded Numbers = Improvement in Visual Quality Rating compared to Existing Conditions.

Italicized Numbering / Grey Shaded Cells = Degradation in Visual Quality Rating compared to Existing Conditions N/A = Viewpoint does not apply to specified Alternative

### TRPA Assessment:

The DEIR/S/S concludes that: “Under the TRPA methodology implementation of Alternative A, B, C, D or E would be consistent with the TRPA Scenic Resource Thresholds.” (App. G, p. 159). However, TRPA’s methodology does not address the impacts associated with the loss of natural scenic resources along the existing Lake Parkway or from VSBSP, although recreational areas are included in the threshold category.

Further, the DEIR/S/S notes that: “As a result of the project, TRPA may designate a new travel route and new scenic resources or redesignate the locations of existing travel routes and resources during the next threshold assessment. A new TRPA roadway travel unit designation would be assigned to the realigned US 50 during the next TRPA Threshold Evaluation Update that occurs after the project construction is complete.” (DEIR/S/S, p. 3.7-42). The DEIR/S/S does not explain why TRPA did not evaluate VSBSP (a scenic resource) nor consider the existing Lake Parkway segment in the last threshold evaluation (2016) as was suggested by the VIA, especially given the current views are better than those that will occur with the project (as noted by the reduction in the scenic quality rating). It is likely that such a designation may have placed greater importance on protection of these areas from degradation and thereby required additional justification to allow the negative impacts of the proposed project.

***The EIR/S/S should evaluate the existing roadway units and resources along Lake Parkway (including VSBSP; more discussion below) for designation in the next threshold assessment. The EIR/S/S must then evaluate the impacts the project will create on the potential for these areas to be designated as scenic resources, since the proposed project will forever impact the existing scenic views.***

### **Impacts of Alternative E:**

The DEIR/S/S concludes that the skywalk included in Alternative E would have a significant impact on Roadway Travel Unit #32,<sup>82</sup> however the design could be modified to reduce its visual mass by converting it to a narrower overhead pedestrian walkway.<sup>83</sup> The DEIR/S/S then

<sup>82</sup> “The elevated skywalk would be a massive, new, human-made feature within Roadway Travel Unit #32... Furthermore, the visual presence of the skywalk structure and its enclosure of the highway would substantially degrade the character of the roadway corridor as experienced by motorists. This would be a significant impact for purposes of CEQA, and TRPA.” (DEIR/S/S, p. 3.7-39)

<sup>83</sup> “To mitigate for this impact, TTD, TRPA, and FHWA could modify the design the elevated skywalk feature to reduce its visual mass by converting it to more narrow overhead pedestrian walkway crossings only. This design modification would avoid impacts on the intactness and unity of views from the road, and would reduce or eliminate degradation of the character of the roadway corridor as experienced by motorists...Significance after Mitigation... Reducing the scale of the structure associated with Alternative E, by constructing a pedestrian walkway over the highway rather than a deck structure that fully encloses the highway, would reduce the visual impact of the structure, potentially to a less-than-significant level, depending on the design.” (DEIR/S/S, p. 3.7-49)

12-45  
cont.

12-46

dismisses this option, claiming this narrower design would “alter the nature of Alternative E” and “likely... not feasibly meet the project objectives.”<sup>84</sup> However, the DEIR/S/S does not define what the ‘nature’ of Alternative E is or how a narrower design would alter it, nor does it discuss what other project objectives will not be met. Further, the DEIR/S/S fails to address the tradeoffs that may occur under Alternative E compared to Alternatives B-D. For example, this mitigation may not achieve the expressed desire to close the street down for events,<sup>85</sup> however it could result in less-than-significant impacts to other resources (e.g. transportation and visual resources) compared to alternatives B-D. There is also no discussion of other locations within and adjacent to the project area where such events may be held without this substantial roadway project (e.g. Heavenly Village, existing casino parking lots, side streets, etc.).

12-46  
cont.

*The EIR/S/S needs to clearly and sufficiently explain why this mitigation option is not feasible. This discussion needs to also address which objective(s) will not be met, as well as explore other variations that could be made to Alternative E that would better meet objectives. The EIR/S/S should also disclose the tradeoffs associated with this narrower design. The EIR/S/S's dismissal of this mitigation with little discussion or analysis appears a means to favor the alternative that is preferred by the TTD (Alternative B).*

#### **Disruption of scenic views by manmade structures:**

We are also concerned that the impacts of all manmade structures on viewsheds have not been adequately considered. The DEIR/S/S states that “Vertical components of the project, such as supports for traffic signals and light standards, have insufficient mass to substantially disrupt scenic views.” However, while such structures may be narrow relative to large objects and buildings, the presence of manmade structures can negatively impact views of a natural scene.<sup>86</sup> This claim appears to be based on consultant opinion.

12-47

*The EIR/S/S must clarify how the presence of such vertical components has been accounted for in the simulations, including the viewpoints along Lake Parkway and within VSBSP.*

#### **Proposed mixed use locations:**

The proposed mixed-use sites are located in areas where heights of up to 95 feet are allowed by the Tourist Core Area Plan (TCAP). As noted on the figure below, mixed-use sites 2 and 3 fall in the “TSC-C” zoning district, where buildings up to 95 feet are allowed. Mixed use site 1 is in the TSC-MU district, allowing 56 feet of height.<sup>87</sup>

12-48

<sup>84</sup> “However, this mitigation would substantially alter the nature of Alternative E and is likely to not feasibly meet the project objectives. Therefore, recognizing the uncertain effectiveness and feasibility, it is important to disclose the potential for Alternative E to result in a significant and unavoidable visual impact for purposes of CEQA and TRPA.” (DEIR/S/S, p. 3.7-49)

<sup>85</sup> Economic Assessment, p. 48.

<sup>86</sup> Appendix G, Draft Visual Impact Assessment.

<sup>87</sup> TCAP, Table 7: “Roof and Height Standards,” p. C-18



Excerpt from ICAP Figure 5.1 with proposed mixed-use sites identified by district.

The DEIR/S/S dismisses responsibility for evaluating the potential visual impacts of the proposed mixed use sites 1, 2, and 3, although the sites are included as part of the proposed project. The potential height and bulk of three new tall structures will impact the scenic view from highways, pedestrian paths, bike paths, and recreation areas (e.g. VSBSP). Although additional project-level review would be required, the DEIR/S/S must still assess the potential impacts of all project components on visual resources. Further, given the project objectives include improvement of visual conditions within the tourist core, the potential for the mixed use site developments to affect visual resources – both through the dominance of the large new buildings as well as the obstruction of open viewsheds – must be

12-48  
cont.

assessed. Consultant speculation that new developments would “likely not” substantially alter the visual character of the area because “other development is nearby,” and additional project-level review would be required, does not substitute for an analysis of the potential visual impacts.<sup>88</sup>

The DEIR/S/S includes no analysis or simulated images to assess the potential visual impacts of the proposed mixed use sites. The closest we could locate is the simulated view from viewpoint 12 for Alternative D (App. G, p. 131), which does not include the potential buildings at mixed use locations 1 or 2. It is misleading to the public and decision-makers to provide visual simulations that presumably reflect the visual ‘improvements’ from the proposed project yet exclude buildings that are proposed as part of the project, and which are likely to impact many of the same views that are advertised as ‘improved’ by the project.

***The EIR/S/S needs to adequately analyze the scenic impacts of the proposed mixed use sites.***

<sup>88</sup> “Sites 1, 2, and 3 are all near Heavenly Village Center. Other development is nearby. New mixed-use development at these sites would likely not, by itself, alter the visual character of the area in a substantial way. New development would need to comply with all applicable design standards and guidelines, including height standards, and would need to be oriented and designed in ways that avoid impacts to TRPA scenic threshold ratings for travel routes and scenic resources. The mixed-use development projects would have to undergo project-level environmental review once they are defined and submitted for permitting. Under these conditions, it is assumed that new mixed-use development on Sites 1, 2, and 3 would have few additional impacts beyond those described for the transportation improvements on scenic quality and visual character. For these reasons, development of the mixed-use development sites with Alternative B would result in a less than- significant impact on scenic quality and visual character. For the purposes of NEPA, the design features of the mixed-use development sites included in Alternative B would avoid or minimize scenic quality and visual character effects such that no additional mitigation measures are needed or feasible to implement.” (DEIR/S/S, p. 3.7-30)

**Cumulative visual impacts:**

The DEIR/S/S concludes there are no cumulatively considerable or adverse impacts (DEIR/S/S, p. 3.19-24). The same comments regarding the project-specific impact analysis apply to the cumulative impact assessment. In addition, the DEIR/S/S does not include the Gondola Vista project although it is located in the project area.

12-49

*The EIR/S/S needs to address the flaws in the visual impact assessment from a cumulative perspective, including inclusion of the impacts of the Gondola Vista project.*

**D. Light and Glare:****Headlight pollution:**

The DEIR/S/S concludes less than significant impacts to light and glare impacts for the project area outside of the residential area, and potentially significant impacts within the residential area.<sup>89</sup> The DEIR/S/S states, “Headlights from traffic on realigned US 50 would not be a new source of light because local traffic already passes through the area.” However, there is a substantial increase in the number of vehicles that will travel on Lake Parkway if the proposed project is constructed, thereby increasing the extent to which light pollution will occur in the new alignment compared to existing conditions. This additional light has the potential to negatively impact the experience of park visitors (e.g. potential future campers within the VSBSP [see 2005 Master Plan, cited previously]) and along the trail network, including trails that connect to the Tahoe Rim Trail, and the Tahoe Rim Trail itself.

12-50

*The EIR/S/S needs to discuss the increased headlight impacts to adjacent natural and recreational areas associated with more vehicle use.*

The DEIR/S identifies the potentially significant impact of headlights to residences in the Rocky Point community, however concludes less-than-significant impacts with mitigation measure 3.7-3,<sup>90</sup> which involves the construction of a 6-8 foot barrier (primarily included for noise reduction). Yet elsewhere, the DEIR/S/S discloses that the FHWA will not pay for installation of this barrier

12-51

<sup>89</sup> “Construction at the intersections of realigned US 50 with local streets (Harrah’s Drive, Heavenly Village Way, Montreal Road, Fern Road, and Echo Road) would involve installation of safety lighting. It would be similar to existing lighting at intersections along existing US 50 from Pioneer Trail to Lake Parkway. Realigned US 50 would pass through the residential neighborhood between Montreal Road and Pioneer Trail. Currently, traffic passes through the neighborhood using the existing road network. Motorists are required to use headlights from dusk to dawn. Headlights from traffic on realigned US 50 would not be a new source of light because local traffic already passes through the area; however, the orientation of headlights on realigned US 50 relative to residential properties and the number of vehicles would differ from existing conditions. New sources of light from new streetlights would not result in substantial night lighting and glare because standard design practices would limit spillover illumination. In this case, impacts related to light and glare from fixed sources for the Alternative B transportation improvements would be less than significant for the purposes of CEQA and TRPA. Headlights of vehicles on realigned US 50 would have a potentially significant impact on residents of the Rocky Point neighborhood living directly along the realigned highway for the purposes of CEQA and TRPA.” (DEIR/S/S, p. 3.7-46)

<sup>90</sup> “The impact of vehicle headlights on private residences after mitigation would be eliminated or reduced to a less-than-significant level for Alternatives B, C, and D for the purposes of CEQA and TRPA.” (DEIR/S/S, p. 3.7-51)

and the feasibility is uncertain due to aesthetic impacts, snow removal requirements, and potential noise reflection.<sup>91</sup> thus there are no guarantees or requirements for it to be installed.

12-51  
cont.

*As a result, the EIR/S/S must identify this impact as significant and unavoidable.*

#### **Light pollution from new stationary sources:**

The DEIR/S/S states, "New sources of light from new streetlights would not result in substantial night lighting and glare because standard design practices would limit spillover illumination." Although the lake side of the proposed new US 50 includes substantial development with existing sources of night light, the mountain side currently lacks such development. While standard practices will minimize the increase in nighttime illumination, there will still be a net increase, which has not been examined.

12-52

*The EIR/S/S needs to evaluate the impacts of the net increase in light pollution relative to existing conditions along the mountain-side of the proposed US 50, including scenic simulations of the existing conditions and post-project light.*

#### **Cumulative light and glare:**

The DEIR/S/S concludes no cumulative adverse impacts associated with light and glare.<sup>92</sup> However, the same flaws associated with the project-based analysis also affect the cumulative analysis. In addition, the impacts from the net addition of light to a new area associated with the proposed project and other cumulative projects in the area (i.e. Gondola Vista, the potential Edgewood Mountain Resort Recreation District) have not been addressed.

12-53

*The EIR/S/S needs to adequately analyze the cumulative light impacts.*

#### **E. Scenic Simulations:**

##### **Tree removal:**

According to the information provided in Appendix L, a substantial number of trees, including many that are greater than 24-30" dbh, will have to be removed to accommodate the widening of Lake Parkway. However, the viewpoint simulations along this section of the roadway (viewpoints 1, 2, 7, and 8) do not appear to reflect the removal of trees in these areas, which results in a false image of how the post-project viewpoint will look. The image below presents a rough comparison of the viewpoints in the scenic assessment lined up next to the tree removal that will be required.

12-54

<sup>91</sup> "The Noise Abatement Decision Report determined that the estimated cost of constructing sound barriers to protect residential units from exposure to traffic noise levels that exceed applicable NEPA criteria with Alternative B would not be reasonable relative to the allowance of money per benefited residence for traffic noise abatement (Caltrans 2016:56). If funding for a sound barrier is not available from FHWA or Caltrans, then funding could be provided by TTD or other agencies...it may not be feasible to construct sound barriers along both sides of the highway that meet aesthetic and snow removal requirements and avoid measurable levels of noise reflection." (DEIR/S/S, p. 3.15-70)

<sup>92</sup> DEIR/S/S, p. 3.19-26.

Following the combined images are the existing and simulated views from three of the four viewpoints with examples of trees (circled in red) that are kept in the simulations yet appear to require removal to accommodate the project (the figure excerpt below does not reflect tree removal throughout the rest of the project area).

*The EIR/S/S needs to clearly show which trees will be removed in the context of the viewpoints and include accurate representations of post-project conditions.*

12-54  
cont.



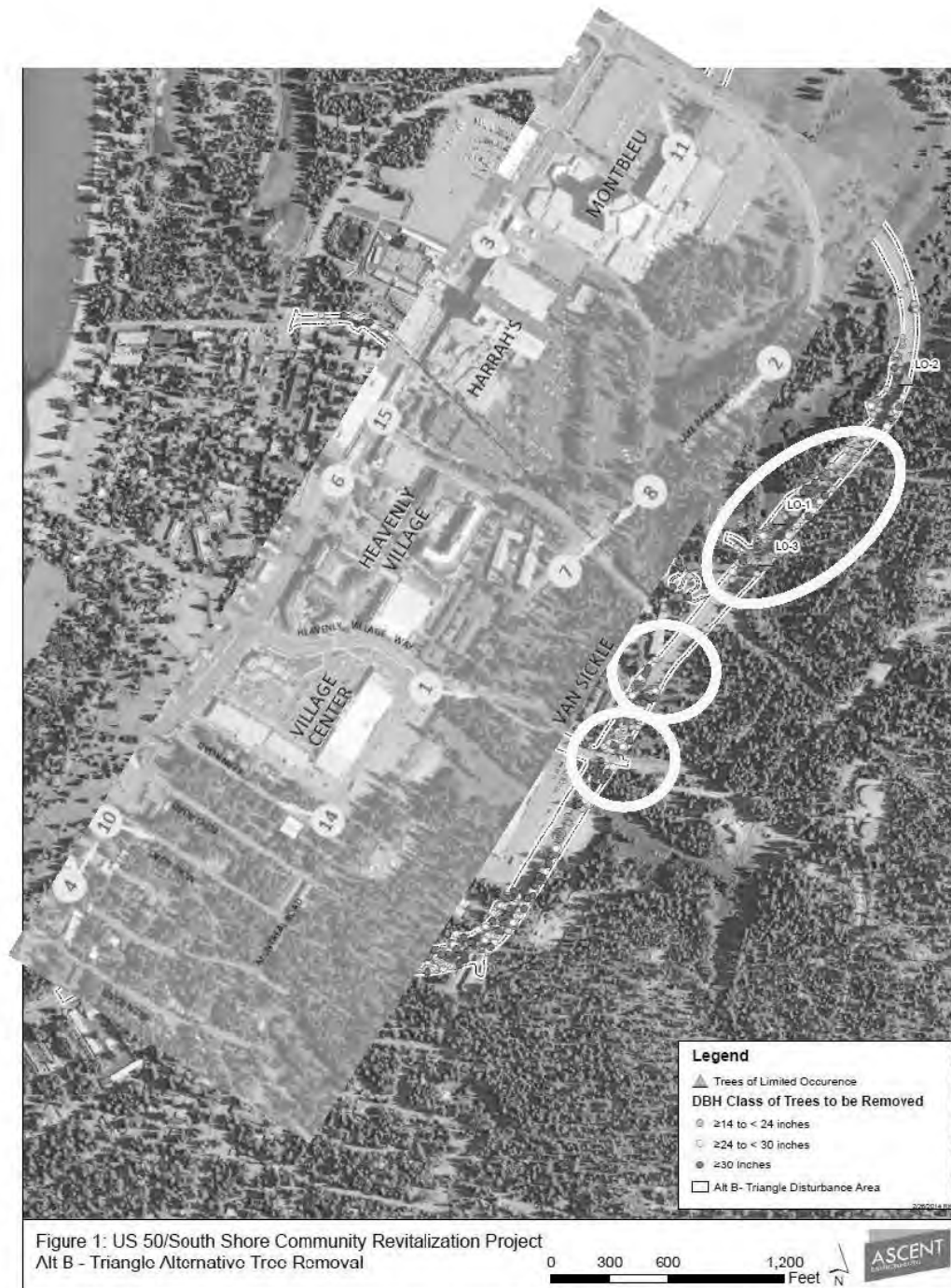


Image above compares a section of App. G's "Viewpoint Location Map" with the tree removal required for Alt. B (App. L). The hollow yellow circles show the general vicinity of viewpoint areas that will be impacted by tree removal.

12-54  
cont.



FIGURE 1

U.S. 50 South Shore Community Revitalization Project  
South Lake Tahoe, California/Stanislaus, Nevada  
El Dorado County, California/Douglas County, Nevada

U.S. 50 South Shore Community Revitalization Project  
South Lake Tahoe, California/Stanislaus, Nevada  
El Dorado County, California/Stanislaus, Nevada

Viewpoint 2: Looking South



FIGURE 2

U.S. 50 South Shore Community Revitalization Project  
South Lake Tahoe, California/Stanislaus, Nevada  
El Dorado County, California/Stanislaus, Nevada

U.S. 50 South Shore Community Revitalization Project  
South Lake Tahoe, California/Stanislaus, Nevada  
El Dorado County, California/Stanislaus, Nevada

View: Simulation at Viewpoint 2 for Alternative B (as applicable to Alternatives C and F)

12-54  
cont.





FIGURE 14

U.S. 50/ South Shore Community Revitalization Project  
South Lake Tahoe, California/Stanislaus Nevada  
El Dorado County, California/Deuel County, Nevada

Viewpoint / Looking Conditions

SOURCE: Visual Resources, Inc.  
FIGURE 14/ Draft EIR/EIS/EIS, Figure 14, 12/14/14



FIGURE 15

U.S. 50/ South Shore Community Revitalization Project  
South Lake Tahoe, California/Stanislaus Nevada  
El Dorado County, California/Deuel County, Nevada

Visual Simulation at Viewpoint 7 for Alternative 3 (also applicable to Alternative D)

SOURCE: Visual Resources, Inc.  
FIGURE 15/ Draft EIR/EIS/EIS, Figure 15, 12/14/14

12-54  
cont.



FIGURE 15

U.S. 50/South Shore Community Revitalization Project  
 South Lake Tahoe, California/Orleans, Nevada  
 El Dorado County, California/Plumas County, Nevada

Visual Simulation of Viewpoint 15 for Alternative B

Visual Simulation of Viewpoint 15 for Alternative B  
 (Visual Simulation of Viewpoint 15 for Alternative B)



FIGURE 16

U.S. 50/South Shore Community Revitalization Project  
 South Lake Tahoe, California/Orleans, Nevada  
 El Dorado County, California/Plumas County, Nevada

Visual Simulation of Viewpoint 16 for Alternative B (also applicable to Alternative D)

Visual Simulation of Viewpoint 16 for Alternative B  
 (Visual Simulation of Viewpoint 16 for Alternative B)

12-54  
 cont.

### Roadway width and retaining walls on Lake Parkway:

The proposed project will require a substantial widening of the existing Lake Parkway. The existing roadway width varies from about 35 to 45 feet; the proposed width would range from 59 to 112 feet<sup>93</sup> – roughly a three- to four-fold increase. It is apparent to even untrained eyes that the simulated images do not adequately reflect this significant widening (notably, the simulations' retention of trees that will actually be cut to accommodate the widened road is another example of how the simulations fail to adequately represent the visual impacts of the project). Further, the location of the viewer in the simulated viewpoints from the side of the road (e.g. viewpoints 2 and 7, images above) makes it difficult to discern the significance of the widening to a driver or pedestrian.

The proposed project will also require new retaining walls along Lake Parkway that will be up to 18 feet tall.<sup>94</sup> The DEIR/S/S describes the general location of the walls,<sup>95</sup> but disclosure of the length of the walls and associated heights could not be located in the DEIR/S/S.

12-55

The simulations fail to accurately portray the significant height of these structures. For example, the simulations for viewpoints 2 and 8 show images from a distance, thereby failing to represent the extent of the height and bulk of the retaining walls as will be experienced by nearly drivers and pedestrians. The retaining wall will be three times the height of most vehicles and pedestrians. The location of vehicles in the simulations distorts the images, making the walls appear shorter than what it appears will be constructed.

*The EIR/S/S must accurately portray the before and after images associated with the proposed project's impacts such that the simulations do not erroneously mask the significance of the widened roadway and retaining walls. Additional viewpoints taken from the perspective of drivers and pedestrians (including views while walking along the sidewalks next to the retaining walls, crossing the roadway, and from the proposed pedestrian bridge), should be included. The EIR/S/S needs to disclose the total length of the retaining walls and associated height.*

### Signage:

The simulated images appear to leave out all signs that will be required by the highway departments, City of South Lake Tahoe, and other signs that will be placed along the Lake Parkway/Montreal Roadway realignment, access roads from the turnouts, and access roads for Edgewood Mountain RRD, including the extensive signage recommended in the DEIR/S/S:

<sup>93</sup> "The width of the paved surface of Lake Parkway currently varies from about 35 feet to 45 feet. The expanded four-lane roadway would range in width from 59 feet to 112 feet." (DEIR/S/S, p. 3.7-27)

<sup>94</sup> "Widening the road to four lanes along the current Lake Parkway alignment would require acquisition of additional right-of-way and construction of retaining walls along the east side of realigned US 50. The retaining walls would be constructed in the area from the entrance road to Van Sickle Bi-State Park to about 900 feet east of Harrah's Driveway. The walls would range in maximum height from 6 feet to 18 feet." (DEIR/S/S, p. 3.7-27)

<sup>95</sup> "The retaining walls would be constructed in the area from the entrance road to Van Sickle Bi-State Park to about 900 feet east of Harrah's Driveway. The walls would range in maximum height from 6 feet to 18 feet." (DEIR/S/S, p. 3.7-27)

*“Signage for transit, parking, visitor information centers, and recreation opportunities would be developed and installed at appropriate locations throughout the project site. Other informational and interpretive/educational/way finding signs, including signs that direct pedestrians towards appropriate crossings, may also be installed along the tourist core area (all build alternatives) and near the pedestrian overcrossing into Van Sickle Bi-State Park (Alternatives B, C, and D).”* (DEIR/S/S, p. 2-19)

The failure to identify signs not only results in inaccurate simulations, but it also skews the comparison of before and after project images because the existing condition pictures include signs (i.e. the existing image of viewpoint 7 includes a prominent road sign on the left side, yet no such sign is included in the simulation although signs will be required for the new US 50 [it is understood that locations may vary]).

12-55  
cont.

***The visual simulations need to be revised to accurately reflect the required and anticipated signage within the project area.***

#### **F. Scenic impacts to Van Sickle Bi-State Park (VSBSP):**

The DEIR/S/S notes that there is no baseline information available for the scenic resources in the VSBSP as no inventory has been completed.<sup>96</sup> The DEIR/S/S states the 2011 Threshold Evaluation Report did not include VSBSP in its scenic assessment because it was not open to the public at that time.<sup>97</sup> However, it does not appear that the 2016 TER included this information, and the DEIR/S/S does not provide this information. Further, the DEIR/S/S states: *“Whether future use areas would provide views of realigned US 50 is uncertain,”*<sup>98</sup> although the VSBSP Master Plan includes ample information to evaluate where future use areas will be and to assess whether visual impacts will occur to those areas. The VSBSP is an important recreation area and the project’s scenic impacts must be assessed. After over six years, the TRPA has an obligation to the two states to complete the necessary studies to provide a baseline scenic inventory for the VSBSP. The importance of this bi-state resource as a natural recreational area exceeds the importance of expanding the roadway network.

12-56

***The EIR/S/S must include a baseline scenic inventory for the VSBSP and evaluate the impacts of the alternatives on scenic resources. It is not possible to examine the significance of impacts of the project where no baseline exists for comparison, and thus there is no evidence upon which to base a conclusion of no or less-than-significant impacts. Further, as noted previously, the EIR/S/S needs to assess the potential for designation of the VSBSP as a scenic***

<sup>96</sup> “The Van Sickle Bi-State Park is a public recreation area that directly borders portions of the east side of Lake Parkway and affords views of the project site; the majority of the park is set back and separated from Lake Parkway by existing private parcels (Exhibit 2-1), except at the park entrance and a short section of frontage near the state line. Because it is relatively new (opened in summer 2011), the park has not yet been officially added to TRPA’s list of public recreation areas. Consequently, specific scenic resources associated with the park have not been inventoried.” (DEIR/S/S, p. 3.7-4)

<sup>97</sup> “It should be noted that the Van Sickle Bi-State Park was not analyzed in the TRPA 2011 Threshold Evaluation for scenic quality/resources because it was not open to the public at the time of the document’s approval.” (DEIR/S/S, App. G, p. 81)

<sup>98</sup> DEIR/S/S, p. 3.7-28

*resource and evaluate the impacts the proposed project would have on this resource, including in areas of existing and potential facilities (as identified in the Master Plan).*

12-56  
cont.

#### IV. Long term vs. short term:

The DEIR/S/S acknowledges that: *"In the long term, the build alternatives would result in increased coverage (see Section 3.11, "Geology, Soils, Land Capability, and Coverage"); tree removal and disturbance and loss of sensitive habitats (see Section 3.16, "Biological Environment"); increases in ambient noise levels and visual impacts on neighborhood character in the Rocky Point residential area west of the Heavenly Village Center (see Sections 3.15, "Noise and Vibration," and 3.7, "Visual Resources/Aesthetics"); and the division of the Rocky Point neighborhood and displacement of residences. These impacts would be minimized through implementation of mitigation measures intended to reduce environmental effects."* (DEIR/S/S, p. 3.17-1). We have several concerns with this section.

##### A. Identification of post-mitigation significance:

Even after mitigation, the DEIR/S/S identifies the following long-term impacts as significant and unavoidable (SU):

- Impact 3.7-1: Degradation of scenic quality and visual character
- Impact 3.4-1: Physically divide an established community causing changes to community character and cohesion
- Impact 3.15-3: Traffic noise exposure at existing receptors

12-57

It is misleading to suggest the impacts have been minimized when they remain significant and unavoidable.

*The EIR/S/S should explain that the impacts have been reduced through the implementation of mitigation measures intended to reduce environmental effects, however numerous impacts remain significant and unavoidable.*

##### B. Other long-term impacts

As explained in these comments, the technical analyses are fatally flawed. Once corrected, long-term impacts are also expected to include serious impacts and/or additional impacts to: transportation, visual resources, noise, biological resources, community impacts (affordable housing), climate change, growth-inducing effects, and recreation. **Additional comments regarding water quality, noise, greenhouse gas emissions, recreation, tree removal, growth-inducing effects, and federal Section 4(f) findings are included in the attached table.**

TASC comments on US 50/South Shore Revitalization Project DEIR/R/R - June 2017

Summary of additional resource impacts and comments on DEIR/S/S*				
* This table provides additional comments on other resource areas to accompany the SCTAG's 6/30/2017 detailed comments that are focused on transportation and visual resource impacts.				
Resource	Impact	Intensity of Impact of Alt. B (C & D, where different) and stated significance before mitigation	Stated Reason for Insignificance and/or Mitigation Measures (MM)	Why Stated Reason is not Convincing
LTS = "Less than Significant"; S/L = "Significant & Unavoidable"; B = "Beneficial"; MM = Mitigation Measure				
Water Quality - Surface water:				
3.10 Water Quality	3.10.1: Potential for degradation of surface water quality due to construction activities (p. 3.10-17)	Not estimated.	Existing regulations will have to be met. A SWPPP will be required, which will include BMP requirements, means of waste disposal, etc.	The project will require the disturbance of a significant extent of soil for roadway widening and DEIR/S/S fails to identify the volume of soil and where it will be disposed of. Notably, the DEIR/S/S does not explain the data and source for the assumptions used for air quality modeling in Appendix I regarding vehicle trips for excavation, which presumably requires an assessment of the extent of soil to be removed.
	3.10.2: Surface water quality (p. 3.10-23)	Snow storage will affect runoff; amount not stated - LTS	All snow storage areas will be designed to drain to BMPs.	
		Increased fertilizer use, but amount not stated - LTS	A fertilizer management plan will be required.	Only requires a plan; this does not state how much fertilizer will be allowed. In addition, nitrogen inputs from fertilizer use need to be addressed.
		Nurse coverage will result in a need for more stormwater treatment. There is adequate room to install several stormwater improvements that could exceed the 20-year storm design requirements - B (p. 3.10-26)	Stormwater basin improvements are part of project.	DEIR/S/S includes several enhancements to stormwater treatment systems, including systems that will treat more than the required 20-year storm, however the DEIR/S/S does not commit to installing facilities that exceed this capacity. Unless this is required, the DEIR/S/S may support a LTS conclusion, however there will only be benefits if the greater treatment capacities are required.

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12-59

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Water Quality - Stormwater runoff				
3.10 Water Quality	3.10-3: Stormwater runoff (p. 3.10-36)	Increased coverage will increase stormwater volumes. Coverage increases include: Alt. B - 5.4-7.2 acres; Alt. C - 1.06 acres; and Alt. D - 5.76-7.91 acres. Project will use some existing treatment systems, although the DEIR/S/S includes a list of various improvements. However, per CQA and TRPA requirements, the impact is significant. - 5-	Mitigation Measure 3.10-3: Protect functionality of Rocky Point Stormwater Improvements. Also, project will follow BMP requirements and rely on existing stormwater treatment facilities (or "equivalent or more effective" facilities.)	Proposed mitigation does not require more effective facilities, only equivalent. There are no performance measures included that will be used to determine if existing facilities are adequate. Increased coverage combined with impacts of climate change will require facilities that can handle larger volumes of water in shorter periods of time, but project only requires existing, 20-year design.
				Relies on treatment through Stateline Stormwater Association (SSWA) facilities, which were found to reduce 34 percent of the total nitrogen, 23 percent of the ammonia, 31 percent of the phosphate, and 46 percent of the total suspended solids and increase nitrate (14%) and orthophosphate (3%) by ORR (p. 3.10-14). DEIR/S/S does not discuss how these reductions and increases compare to what was anticipated (and/or what the permit requires). 3.10-24 The results of monitoring efforts must be used to make adjustments or revisions to the BMPs as appropriate (SWRCB 2013, NDOT 2013).
				Need to require installation and effective operation before construction.
Recreation - quality of user experience				
3.0 Recreation	3.3-4 Changes to quality of recreation user experience (p. 3.3-26)	Increased noise, traffic, visual impacts - LTS	Traffic noise would not be discernible by users of facilities. Visual impacts will be addressed through following design standards/etc., plus impacts are consistent with features in an "urban setting" - LTS	No scenic inventory has been performed, therefore the existing baseline is unknown. The noise analysis in Appendix K includes an adjustment that subtracts 5 dB from the predicted noise levels in the VSSP sites, but does not explain why this was applied. In addition, although App. K lists numbered sites that are within VSSP, there is no map which indicates which noise measuring sites in the Park correspond with the numbered values. We requested clarification for these issues on 6/20/2017. As of 6/30/2017, TTD has not provided this information. (Correspondence attached)



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Community Impacts - Physically Divides Community:				
12-62	3.4-1: Physically Divide Community (p. 3.4-17)	Physically divides Rocky Point community and generates increased noise and scenic impacts - SL	MM 3.4-1: Apply MM 3.7-3a (scenic). Includes following design guidelines and mentions potential impacts of sound barrier (p. 3.4-36) - SL	(Maintained as SL)
			MM Apply 3.15-3 a,b,c (noise). Includes: CNEL requirements; offer to retrofit South Shore inn, sound barrier, speed limits, noise abatement report, etc. (p. 3.4-36)	For noise abatement options that "can" be selected (p. 3.15-63); they are not required thus the requirement to implement all feasible measures related to a significant and unavoidable impact has not been met. Also, DEIR/S/S states that FHWA will not fund a sound barrier and while the TTD or other agencies "could" fund it, it is not guaranteed nor required. "The Noise Abatement Decision Report determined that the estimated cost of constructing sound barriers to protect residential units from exposure to traffic noise levels that exceed applicable NEPA criteria with Alternative B would not be reasonable relative to the allowance of money per benefited residence for traffic noise abatement (Caltrans 2016:56). If funding for a sound barrier is not available from FHWA or Caltrans, then funding could be provided by TTD or other agencies." (p. 3.15-66)
Community Impacts - Affordable Housing:				
12-63	3.4-8: Housing supply availability, including affordable housing (p. 3.4-42)	Alt. B: Removes 58 affordable units (low and very-low income), 7 moderate-income units, 11 "golden" units, and 44 Single Resident Occupant (SRO) units. Alt. C: 53, 7, 11, and 44 (resp.). Alt. D: 68 affordable units and 4 SROs. (p. 3.4-43) - TS	"Eligible" displaced owner and tenant residents will be relocated before construction begins on California side.	Does not relocate individuals in SROs, therefore it does not provide for relocation of all affordable units. (p. 3.4-43). Also, assessment is based on outdated data regarding affordable housing and available rental units, and DEIR/S/S does not incorporate information regarding existing conditions.
				Many displaced residents may have to drive to work if relocated to sites that are too far to walk (e.g. the South Tahoe V, which according to TTD, is one area being considered for affordable housing replacement [5/24/2017 TRPA GO hearing]), as a substantial number of existing residents in the project area get to work via non-auto modes (DEIR/S/S, p. 3.4-8). In addition, the net loss in affordable units (through failing to relocate SRO residents) is likely to result in more employees living outside of the Basin and therefore commuting to work, generating additional vehicle impacts, in addition to the social and economic costs of displacing affordable housing.
12-64				
12-65		Displacement of affordable housing for seasonal/part-time residents is unknown.		Does not state whether displaced units include part-time/seasonal housing or only full-time.



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12-66	3.4-4: Housing supply availability, including affordable housing (p. 3.4-42) (continued from previous page)	"Displaced residents must be relocated to comparable replacement housing, which is determined to be housing in an area that is not generally less desirable than the current dwelling unit with regard to utilities, commercial facilities, schools, and public services..." (p. 3.4-14)	TTD would provide affordable housing units to all (eligible) displaced residents, however DEIR/S/S does not discuss potential new locations outside of the project area, although housing specifically located at the proposed mixed use site locations is not guaranteed nor required.	DEIR/S/S does not discuss potential impacts of relocating housing outside of the project area, instead stating it will require future, project-level review (p. 3.4-46). As the DEIR/S/S notes, many residents that will be displaced are spanish-speaking (p. 3.4-7). The Dujo elementary school has a unique program for second language students: <a href="http://dujo.husd.org/two_way_immersion">http://dujo.husd.org/two_way_immersion</a> . If housing is relocated into another school district, there is the potential that the new schools will not be comparable to existing schools with regards to this program. The DEIR/S/S must disclose this potential impact.	
				DEIR/S/S does not discuss whether new mixed use sites, would be comparable with regards to noise (i.e. Exhibit 3.15-2 indicates noise levels at mixed use sites 1 and 3 would violate several criteria and/or would be placed in an area with a less protective noise standard than where residents currently live; in other words, the new housing units will be subject to far more noise than the existing units).	
Soil Conservation - erosion and alteration of topography:					
12-68	3.11.5a: Soil conservation	3.11-2: Increased erosion and alteration of topography during construction (p. 3.11-25)	Alt. B: 56.49 acres; Alt. C: 52.20 acres; Alt. D: 52.39 acres; Alt. E: 0.75 acres	"Project is in urban setting and topographical changes are minimal and consistent with urban setting."	Van Sickle State Park is not "urban." There is an urban area along one side of the park, otherwise it is open, undeveloped forest land (other than some recreational facilities). This also fails to discuss the volume of soil that will be disturbed/removed associated with road cuts on Lake Parkway.
Climate Change: GHGs & Adaptation					
12-69	3.14-1: GHG emissions (p. 3.14-10)	Not estimated	Consistent with 2012 RTP/SCS	Project must still identify related emissions. In addition, as discussed in transportation comments, the growth rates assumed in the RTP (2012 and 2017) have already been exceeded in 2015 (and likely 2016). Additional growth must be accounted for in either the baseline or the future estimated emissions. All other SCTAG comments on transportation analysis apply here, as appropriate.	
	3.14-2: Vulnerability to climate change risks (p. 3.14-26)	Concludes no vulnerability to increased wildfires, landslides and ground saturation, stormwater runoff, snow loading, and high winds.	Regulations in place will mitigate impacts.	As noted in comments related to stormwater runoff and treatment, project does not require treatment beyond the outdated 20-year storm design. Should require design to treat 100-year storm, at a minimum. DEIR/S/S also fails to discuss potential impacts from the substantial road cut (e.g. where the retaining wall will be up to 18 feet high), where saturation and other ground disturbance from weather-related factors may cause problems.	

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Biological Resources – Tree removal:					
11.18 Biological Resources	3.1.6-3: Tree removal (p. 3.1.6-18)	Project will remove 827 trees over 14" dbh, with a total of 163 trees over 24" dbh, and 35 trees over 30" dbh (totals include both states) (Table 3.1.6-4, p. 3.1.6-19).	Tree removal is exempt because the proposed project is an E.P. project. Also, MM 3.1.6-3 requires the preparation of a tree removal, protection, and replanting plan that must meet Chapter 61 requirements.	The DEIR/S/S includes no representation of the existing tree cover in the project area (although App. 1 includes a rough aerial map with tree removal). It is not detailed or focused enough to inform the public regarding which trees (specifically) will be removed; additional maps of zoomed-in locations should be included. The tree removal discussion also includes no comparison to threshold requirements for large seed/old growth trees. While the removal may be exempt by TRPA's Code, the impact must still be analyzed and disclosed. Also, the tree removal and replanting plan should be developed as part of the DEIR/S/S and disclosed to the public in order for the public to assess the impacts of tree removal.	12-71
Noise:					
11.19 Noise	3.1.5-1: Short-term construction noise (p. 3.1.5-27)	Alt. B-D: EIR/S/S states that design features will avoid or minimize impacts.	Due to the linear nature of the project and the relatively short duration of construction activity in any one place, no single receptor location would be exposed to construction-related noise for an excessive period of time. EIR/S/S also states that TRPA's Noise Best Control Measures will be required and that it is not anticipated that any construction activities would occur outside of the 8am to 6:30pm timeline without measures required by the agencies.	EIR/S/S does not estimate what the "relatively short" duration is, nor define what would be considered an excessive period of time for noise exposure. While noise from construction may be exempt during daytime hours, the EIR/S/S must still analyze and disclose impacts. The EIR/S/S does list noise associated with construction equipment but does not address the length of time receptors may be exposed to the noise. Also, noise-generating activities outside of exempt hours should be specifically prohibited unless an emergency.	12-72
		Alt. E: Significant impacts during nighttime hours (some activities will occur at night to reduce traffic conflicts) – S	Remains significant.	EIR/S/S does not evaluate alternative options to avoid nighttime work. For example, can traffic be re-routed around Lake Parkway/Mantres/Park Avenue during periods of light traffic (e.g. shoulder season/weekday periods)? In other words, what criteria are used to determine whether construction can be done during certain times? In addition, EIR/S/S should discuss existing noise and expectations at the casino area; notably, other sections refer to the "urban" environment to suggest impacts are more acceptable/expected. The DEIR/S/S should discuss the noise-related expectations of people visiting the affected casino core area.	12-73
	3.1.5-3: Traffic noise at existing receptors (p. 3.1.5-32)	Traffic noise modeling – SU	Must implement all feasible noise abatement measures.	Does not define what will determine whether measures are feasible, nor discuss the findings of the FHWA Noise Abatement study, which determined the sound barrier/wall will not be funded (and funding by TTD or other entities is an option but is not required). (p. 3.1.5-70)	12-74

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Mandated Sections - Growth inducing:					12-75
4.3 (a)(ii)(d), Sustains	4.3-4: Growth-inducing impacts	Claims no impacts:	Development is capped by the RP//TRP and the proposed project does not cause a change in development patterns in the region.	Growth-inducing impact occurs if project fosters population or economic growth and/or removes a barrier to growth (p. 4-5). The proposed project does all three: 1. Population growth will be associated with the additional 150 mixed use units and the additional visitation to the area (predicted to be 25% by the Economic Analysis). 2. Fostering economic growth is a goal of the project. 3. Currently, new development would be limited by the existing LOS conditions; proposed project aims to improve LOS, which will allow for more development to be approved in the future since new allocations are tied to LOS by the TRPA Regional Plan (and would presumably limit any increases in development if new trips will significantly impact LOS, including trips from redevelopment projects).	
			Project does not propose expansion of existing transportation or transit system.	Project increases roadway capacity (see detailed transportation comments), and proposes potential expansion of Lake Parkway West and Strollline Avenues, which represents an expansion of the transportation system. In addition, see comments regarding technical inadequacies of traffic analysis.	
Section 4(f) Findings:					12-76
4.3 (a)(ii)(e), Mitigates	Van Sickle State Park - potential impacts related to visual resources and noise	Would not adversely affect activities, features, or attributes that qualify VSSP for region or protection	Right of Way incorporation will only involve 0.1% of total park area, and there are no impacts to visual quality or noise	As there is no baseline scenic inventory, it cannot be concluded that there are no visual resource impacts. Those impacts are also uncertain. See detailed comments regarding VSSP.	

Receptor No.	Include in Summary Table?	Location	Additional noise reduction provided? (and manually calculated in cell)	Attenuation Notes	Parcel acquired for new ROW (according to acquisition maps)?	Parcel acquired for redevelopment site (according to acquisition maps)?	Parcel acquired under Alternative B (according to NSR)?	Existing Noise Levels (dB CNEL)	Existing Plus Alternative B (dB CNEL)
121	no	Lake Parkway			no	no	no	45	48
122	no	Park Avenue			no	no	no	62	63
123	no	Park Avenue			no	no	no	58	62
124	no	US 50 (Lake Tahoe Blvd.)			no	no	no	71	67
125	no	La Salle Street			no	no	no	46	45
126	no	US 50 (Lake Tahoe Blvd.)			no	no	no	60	54
127	no	Friday Avenue			no	no	no	47	45
128	no	Cedar Avenue			no	no	no	49	46
129	no	US 50 (Lake Tahoe Blvd.)			no	no	no	65	59
130	no	Cedar Avenue			no	no	no	49	46
131	no	US 50 (Lake Tahoe Blvd.)			no	no	no	55	49
132	no	US 50 (Lake Tahoe Blvd.)			no	no	no	46	44
133	no	Transit Way			no	no	no	35	36
134	no	Lake Parkway			no	no	no	55	60
135	no	US 50 (Lake Tahoe Blvd.)		The outdoor air	no	no	no	66	61
136	yes	Stateline Avenue		There may not	no	no	no	65	66
137	no	Stateline Avenue			no	no	no	53	56
138	no	Stateline Avenue			no	no	no	56	58
139	no	US 50 (Lake Tahoe Blvd.)			no	no	no	66	58
140	no	US 50 (Lake Tahoe Blvd.)			no	no	no	56	50
141	no	US 50 (Lake Tahoe Blvd.)			no	no	no	45	42
142	yes	Van Sickle Bi-State Park	yes	5 dB additional	no	no	no	58	68
143	no	Van Sickle Bi-State Park	yes	5 dB additional	no	no	no	42	47
144	no	Van Sickle Bi-State Park	yes	5 dB additional	no	no	no	39	43
145	no	Van Sickle Bi-State Park	yes	5 dB additional	no	no	no	42	47
146	no	Van Sickle Bi-State Park	yes	5 dB additional	no	no	no	37	39
147	no	Van Sickle Bi-State Park	yes	5 dB additional	no	no	no	38	41
148	no	US 50 (Lincoln Highway)			no	no	no	53	51
149	no	US 50 (Lincoln Highway)			no	no	no	65	60
150	no	US 50 (Lincoln Highway)			no	no	no	33	35
151	no	US 50 (Lincoln Highway)			no	no	no	42	46
152	no	US 50 (Lincoln Highway)			no	no	no	53	54
153	no	US 50 (Lincoln Highway)			no	no	no	37	37
154	no	US 50 (Lincoln Highway)			no	no	no	54	52
155	no	US 50 (Lincoln Highway)			no	no	no	44	47
156	no	US 50 (Lincoln Highway)			no	no	no	48	52
157	no	US 50 (Lincoln Highway)			no	no	no	61	56
158	no	Lake Parkway—NV side			no	no	no	63	66
159	no	Lake Parkway—NV side			no	no	no	60	65
160	no	US 50 (Lincoln Highway)			no	no	no	63	63
161	no	US 50 (Lincoln Highway)			no	no	no	53	54
162	no	Lake Parkway—NV side			no	no	no	55	54
163	no	Lake Parkway—NV side			no	no	no	51	52
164	no	Lake Parkway			no	no	no	53	53
165	no	Lake Parkway—NV side			no	no	no	60	59
166	no	Lake Parkway—NV side			no	no	no	58	58
167	no	Lake Parkway			no	no	no	52	52
Table D-14	formula	Table D-14			G11010010_02_031_AltB ROW Acquisition by Wood Rogers	G11010010_02_031_AltB ROW Acquisition by Wood Rogers	Table 8-1	Tables D-14 thru D-17	Table D-14

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**Subject:** Re: Another cite -- Re: Request for references cited in US50/SSCR DEIR/S/S  
**From:** Jennifer Quashnick (jqtahoe@sbcglobal.net)  
**To:** jallen@tahoetransportation.org  
**Date:** Wednesday, June 21, 2017 4:54 PM

Hi Judi,

I appreciate the quick response!  
 As to the noise site data, App. K lists numbered sites and associated measurements/modeling, but includes no map to correlate with the site numbers, while the DEIR/S/S includes figures (e.g. 3-15.2) that show site locations as circles, but they are not labeled with the site numbers. I haven't found a map that matches the site numbers in App K with the locations, other than a select few sites.

Thank you,  
 ~Jennifer

**From:** Judi Allen <jallen@tahoetransportation.org>  
**To:** 'Jennifer Quashnick' <jqtahoe@sbcglobal.net>  
**Sent:** Wednesday, June 21, 2017 1:59 PM  
**Subject:** RE: Another cite -- Re: Request for references cited in US50/SSCR DEIR/S/S

12-78

Hello,

There are additional Van Sickle plan documents here: [http://www.nsladigitalcollections.org/browse/nevadaparkspublicland#search/facet\\_1:Planning%20-%20State%20Parks/](http://www.nsladigitalcollections.org/browse/nevadaparkspublicland#search/facet_1:Planning%20-%20State%20Parks/) if the one I attached is not the one you are looking for.

Did you look in Appendix K for the noise related documents you are requesting?

Please let me know if those are not the documents you are looking for.

Regards,

Judi Allen  
 Executive Assistant  
 Tahoe Transportation District  
 P.O. Box 499  
 Zephyr Cove, NV 89448  
 775/589-5502 - Direct  
 775/588-0917 - Fax  
[www.tahoetransportation.org](http://www.tahoetransportation.org)

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**From:** Jennifer Quashnick [mailto:jqtahoe@sbcglobal.net]  
**Sent:** Tuesday, June 20, 2017 12:38 PM  
**To:** info@tahoetransportation.org  
**Cc:** jallen@tahoetransportation.org  
**Subject:** Another cite -- Re: Request for references cited in US50/SSCR DEIR/S/S

Hello again,  
 Can you please also provide the Van Sickle Bi-State Park Master Plan?  
 Thank you!

**From:** Jennifer Quashnick <jqtahoe@sbcglobal.net>  
**To:** info@tahoetransportation.org  
**Cc:** "jallen@tahoetransportation.org" <jallen@tahoetransportation.org>  
**Sent:** Tuesday, June 20, 2017 12:16 PM  
**Subject:** Request for references cited in US50/SSCR DEIR/S/S

Hello Mr. Nygaard,

Can you please provide the following documents as cited in the US 50/SSC Revitalization DEIR/S/S? Also, I'm assuming one of these will show where the noise-related sites are located as referenced in App. D (if not, can you please also provide that information)?

In addition, perhaps these references will answer this, but I am also trying to locate the reason for the -5 dB adjustment to the model to the Van Sickle Park locations (e.g. App. D, p. 50). Can you provide or refer me to more information?

Thank you,  
 ~Jennifer

2013a (September). Technical Noise Supplement (TeNS). Technical supplement to the Traffic Noise Analysis Protocol.

2015b (November). Noise Study Report, US 50/South Shore Community Revitalization Project. Prepared by LSA Associates, Inc.

\_\_\_\_\_. 2016 (March). Noise Abatement Decision Report—U.S. 50 South Shore Community Revitalization Project. South Lake Tahoe, CA and Douglas County, NV. 003-ED-50-PM 79.00-80.44; NDOT-DC-50 PM 0.00-0.70; EA No. 03-1E330K. Prepared by LSA Associates. Caltrans. See California Department of Transportation.

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**Subject:** Re: Another cite -- Re: Request for references cited in US50/SSCR DEIR/S/S  
**From:** Jennifer Quashnick (jqtahoe@sbcglobal.net)  
**To:** jallen@tahoetransportation.org  
**Date:** Wednesday, June 21, 2017 5:55 PM

PS: The noise documents I'm looking for are not in App K.

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**From:** Judi Allen <jallen@tahoetransportation.org>  
**To:** 'Jennifer Quashnick' <jqtahoe@sbcglobal.net>  
**Sent:** Wednesday, June 21, 2017 1:59 PM  
**Subject:** RE: Another cite -- Re: Request for references cited in US50/SSCR DEIR/S/S

Hello,

There are additional Van Sickle plan documents here: [http://www.nsladigitalcollections.org/browse/nevadaparkspublicland#search/facet\\_1:Planning%20-%20State%20Parks/](http://www.nsladigitalcollections.org/browse/nevadaparkspublicland#search/facet_1:Planning%20-%20State%20Parks/) if the one I attached is not the one you are looking for.

Did you look in Appendix K for the noise related documents you are requesting?

Please let me know if those are not the documents you are looking for.

Regards,

Judi Allen  
Executive Assistant  
Tahoe Transportation District  
P.O. Box 499  
Zephyr Cove, NV 89448  
775/589-5502 - Direct  
775/588-0917 - Fax  
[www.tahoetransportation.org](http://www.tahoetransportation.org)

12-78  
cont.

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**From:** Jennifer Quashnick [mailto:jqtahoe@sbcglobal.net]  
**Sent:** Tuesday, June 20, 2017 12:38 PM  
**To:** info@tahoetransportation.org  
**Cc:** jallen@tahoetransportation.org  
**Subject:** Another cite -- Re: Request for references cited in US50/SSCR DEIR/S/S

Hello again,  
Can you please also provide the Van Sickle Bi-State Park Master Plan?  
Thank you!



Print

<https://us-mg204.mail.yahoo.com/neo/launch?partner=sbc&rand=da2r...>

**From:** Jennifer Quashnick <jqtahoe@sbcglobal.net>  
**To:** [info@tahoetransportation.org](mailto:info@tahoetransportation.org)  
**Cc:** "[jallen@tahoetransportation.org](mailto:jallen@tahoetransportation.org)" <[jallen@tahoetransportation.org](mailto:jallen@tahoetransportation.org)>  
**Sent:** Tuesday, June 20, 2017 12:16 PM  
**Subject:** Request for references cited in US50/SSCR DEIR/S/S

Hello Mr. Nygaard,

Can you please provide the following documents as cited in the US 50/SSC Revitalization DEIR/S/S? Also, I'm assuming one of these will show where the noise-related sites are located as referenced in App. D (if not, can you please also provide that information)?

In addition, perhaps these references will answer this, but I am also trying to locate the reason for the -5 dB adjustment to the model to the Van Sickle Park locations (e.g. App. D, p. 50). Can you provide or refer me to more information?

Thank you,  
~Jennifer

2013a. (September). Technical Noise Supplement (TeNS). Technical supplement to the Traffic Noise Analysis Protocol.

2015b (November). Noise Study Report, US 50/South Shore Community Revitalization Project. Prepared by LSA Associates, Inc.

\_\_\_\_\_. 2016 (March). Noise Abatement Decision Report—U.S. 50 South Shore Community Revitalization Project. South Lake Tahoe, CA and Douglas County, NV. 003-ED-50-PM 79.00-80.44; NDOT-DC-50 PM 0.00-0.70; EA No. 03-1E330K. Prepared by LSA Associates. Caltrans. See California Department of Transportation.

12-78  
cont.



**Tahoe Area  
Sierra Club  
Group**

Letter  
12  
Attachment

Tahoe Regional Planning Agency  
128 Market St.  
Stateline, NV 89449

March 22, 2017

**Re: Comments on the draft Regional Transportation Plan update and associated Initial Study/Initial Environmental Checklist (IS/IEC)**

Dear Ms. Beryl:

The Friends of the West Shore (“FOWS”) and the Tahoe Area Sierra Club (“TASC”) thank you for the opportunity to provide comments on the draft 2017 Regional Transportation Plan (RTP) update, Initial Study/Initial Environmental Checklist (IS/IEC), and related documents. The RTP lays out a multi-pronged approach to address transportation issues in the Basin, identifying the 2012 RTP’s focus as improving transportation and reducing vehicle trips within Town Centers,<sup>1</sup> the 2017 RTP’s focus as addressing transportation within the Region, (e.g. from community centers to other community centers),<sup>2</sup> and the 2021 RTP’s focus as reducing regional transportation impacts (e.g. travel from Northern California and Nevada to and from the Basin).<sup>3</sup>

The 2017 RTP includes many positive measures and approaches that will be important in addressing Tahoe’s transportation impacts. The 2017 RTP also clearly explains the different approaches and management strategies spanning from *within* community centers, *among* centers, and travel to and from the Lake Tahoe Basin, all of which play an important role in Tahoe’s transportation system. New technology also provides promising options to further improve transportation planning. However, we have several concerns and recommendations regarding the RTP update and associated IS/IEC (detailed comments follow):

- The 2017 RTP includes no modifications to ensure existing traffic problems are not exacerbated;
- The 2017 RTP IS/IEC does not adequately consider the traffic increases associated with post-2012 RPU amendments, recently-approved projects adjacent to the Basin (e.g. Squaw Valley and Martis Valley area Specific Plans), conversions of single-family

<sup>1</sup> “The priorities of the 2012 Regional Transportation Plan began by creating walkable, bikeable community centers to better address Everyday Tahoe travel needs.” (RTP, p. ES-5)

<sup>2</sup> “Instead, the first need is the foundation of a seamlessly interconnected, well-functioning transportation system within the Region to assure travel options and easy movement once people arrive. The priorities of this 2017 plan’s transportation infrastructure, programs, and management activities will implement this foundation. They encourage the use of multi-modal options to increase the efficiency, capacity, and flexibility of what is fundamentally a fixed regional transportation system.” (RTP, p. ES-3)

<sup>3</sup> “With a clearer understanding of the number and types of users and their travel needs and patterns, the time is ripe to raise and resolve the issue of regional funding so the Lake Tahoe Region is well-positioned in 2021 to chart a clear path to buildout of the transportation system that assures continued preservation of the environment, quality of life for residents, and a high-quality experience for the millions of people who travel to Lake Tahoe each year.” (RTP, p. ES-11)

## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

homes to vacation rentals, capacity-expanding highway projects, and other existing conditions not addressed in the 2012 analysis;

- Vehicle impacts associated with entry/exit visitor traffic on public health and safety are not adequately discussed;
- Recent increases in traffic from visitors exiting the Basin on peak congestion days are not reflected by the 2014 baseline year (used as the existing conditions for the environmental analysis) and total traffic has increased.<sup>4</sup> Recent increases also reflect a larger problem that has not been adequately addressed by the 2017 RTP wherein our transit systems are not keeping up with the increases in development and visitor growth;
- Aggressive measures and/or political efforts to pursue more effective measures to reduce visitor entry/exit traffic need to be pursued immediately and not delayed until 2021.<sup>5</sup> Political efforts need to be initiated very soon as it will take time to garner political support for legal and regulatory changes for such measures (e.g. road toll/user fee). The 2017 RTP fails to discuss and require specific actions to achieve this goal;
- The RTP does not provide a plan to review successful measures in other areas or a plan to acquire adequate funding to cover transportation needs, although funding remains the biggest impediment to implementing an adequate transit network, and options to address the funding shortfalls are not adequately considered (e.g. road toll/user fee); and
- A list of potential local funding measures has not been provided to jump start local conversations about solutions to Tahoe's transit problems, despite the forty year gap since initial solutions were initially discussed in the mid-1970s.

To address these concerns, we recommend the following:

1. Adopt the “no new net VMT increase” concept proposed by the League to Save Lake Tahoe (this is not a building moratorium, but rather a requirement that future projects include adequate measures to avoid increasing VMT); in addition, we recommend that future special events or temporary activities be prohibited from increasing vehicle trips during peak periods;
2. Adjust the IS/IEC data to account for the potential increases in traffic from the following and adjust planning accordingly:
  - a. The Village at Squaw Valley and Martis Valley West Parcel Specific Plans;
  - b. Post-2012 RPU amendments;
  - c. Existing and future conversions of homes to vacation rentals which serve as additional de-facto Tourist Accommodation Unit (TAU) uses that are not addressed by the RPU's cap on TAUs; and
  - d. Highway expansion projects that will result in additional VMT, including the State Route 89/Fanny Bridge Community Revitalization Project (Fanny Bridge Bypass) and the South Shore Community Revitalization Project (aka “the Loop Road”).

<sup>4</sup> “Ms. Maloney said the traffic counts have started to trend upwards in the past three or four years.” (TRPA GB 2/22-2/23/2017, Minutes, p. 8)

<sup>5</sup> “By first creating a seamless in-region transportation system, by the next update in 2021, partners can direct more action emphasis to providing effective travel options for visitors entering and existing the Region.” (RTP, p. 1-15)

## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

3. Although a quantitative assessment of existing conditions (as reflected by the traffic increases in 2015 and 2016, especially for visitors exiting the Basin) may not be possible due to the need to select a baseline year to represent the existing conditions for the environmental analysis, the RTP update and IS/IEC should include a discussion of recent traffic impacts and, at minimum, a qualitative comparison to the 2014 baseline data;
4. In addition to stronger parking management strategies to more effectively manage existing parking, the RTP should incorporate policies which do not allow for increases in parking spaces while incentivizing the removal of existing parking spaces; and
5. The RTP should include a robust discussion of more aggressive traffic-reducing and funding mechanisms, including a road toll/user fee (which would not only help reduce the funding shortfall for future transit needs, but also to discourage personal vehicle use) and a focused effort to utilize Adaptive Roadway Management (currently listed on the RTP's "unconstrained" list).

Detailed comments regarding these concerns and recommendations are attached. In addition, we hereby incorporate the 3/20/2017 comments submitted by the League to Save Lake Tahoe (LTSLT), including but not limited to concerns regarding the RTP's reliance on other documents which are not yet available for public release (e.g. the Long Range Public Transit Plan and Corridor Plans). We would be happy to meet to discuss these comments. Please contact Jennifer Quashnick at [jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net) or Laurel Ames at [amesl@sbcglobal.net](mailto:amesl@sbcglobal.net) if you have any questions.

Sincerely,



Susan Gearhart,  
President  
Friends of the West Shore



Laurel Ames,  
Conservation Chair  
Tahoe Area Sierra Club



Jennifer Quashnick,  
Conservation Consultant

## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

**Adopt a “no net VMT increase” amendment:****New projects:**

As proposed by the LTSLT,<sup>6</sup> we recommend TRPA immediately adopt a “no net VMT increase” policy so that existing transportation problems are not made worse in the immediate future while the agency leads efforts to examine better planning mechanisms (e.g. the Transportation Measures Working Group) and to implement the 2017 RTP policies (which include mitigating traffic impacts from new, expanded, or revised developments or land uses<sup>7</sup>). The proposed amendment would not be a moratorium on new development; rather, it would require future projects and plans to include adequate measures and project adjustments to ensure additional traffic impacts are not generated through measures which may include:

- Parking fees paid by business owners and/or developers that are used to support transit (which may involve business owners charging their customers for parking to collect such fees);
- Transit subsidies;
- 1:2 offsets for new parking spaces; and
- Incentives for passengers using Lyft, Uber, taxis, shuttles, etc.

As the RTP tiers from the 2012 Regional Plan Update (RPU), we recognize that certain recommendations may require associated RPU amendments.

**New events and temporary activities:**

Events which draw a substantial number of new vehicles during peak periods have been approved in recent years, further exacerbating roadway conditions during times that traffic congestion is already a problem (i.e. Snowglobe in the City of South Lake Tahoe over the New Year’s Eve Holiday).<sup>8</sup> Increases in vehicle trips during peak periods associated with events and other potential temporary activities should be prohibited unless and until a comprehensive and effective transit system which reduces vehicle use by visitors entering and exiting the Tahoe Basin is successfully implemented. As noted for new projects, this is not suggesting that new events be denied, but rather that strong measures are included to prevent increased peak vehicle trips. Additional measures to reduce peak trip generation should also be employed for events that have already been approved and create or contribute to peak roadway congestion, such as the Snowglobe festival<sup>9</sup> and Annual Celebrity Golf Tournament at Edgewood Golf course.<sup>10</sup>

<sup>6</sup> Concept proposed in 12/12/2016 written comments on 2015 Threshold Evaluation Report and reiterated by Shannon Eckmeyer, Esq., during the 3/8/2017 APC hearing.

<sup>7</sup> “Policy 1.3: Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses by prioritizing projects and programs that enhance non-automobile travel modes.” (RTP, p. 2-3)

<sup>8</sup> “Although an estimated 10 million cars enter the Region annually, congestion is not always the result. Peaks in travel are experienced at specific locations during holiday weekends, for special events, and on high snowfall days.” (RTP, p. 3-4) [Emphasis added]

<sup>9</sup> <http://snowglobemusicfestival.com/>

<sup>10</sup> <https://americancenturychampionship.com/tournament-information/schedule-of-events/>

## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

*We recommend TRPA immediately consider and approve the proposed “No net VMT increase” policy for projects, and that it be applied to redevelopment and conversions of uses that increase vehicle use in addition to all new development. We also recommend TRPA adopt similar requirements which prohibit increased vehicle trips during peak periods associated with new and/or expanded future events and temporary activities.*

### Revisions and new information requiring analysis:

#### RPU Amendments:

Amendments to the RPU (including Area Plan approvals) have resulted in land use changes that are likely to increase traffic compared to existing conditions. For example:

- The environmental review performed for the January 2015 TRPA Code amendment to allow conversions of Commercial Floor Area (CFA) to Tourist Accommodation Units (TAUs)<sup>11</sup> did not adequately address the net regional increased vehicle trips that may result;
- The Placer County Tahoe Basin Area Plan<sup>12</sup> adopted in January 2017 allows for additional conversions of TAUs in Placer County without having accounted for the *local* impacts of additional TAUs and TAU morphing<sup>13</sup> (the final EIR’s response to comments does not address this specific issue<sup>14</sup>);
- Regulations allowing TAU “morphing” continue to allow for net increases in vehicle trips that have not been accounted for in environmental impact analyses;<sup>15</sup> and
- A significant number of large single family homes have been or are being converted/used as vacation rentals without being counted under TRPA’s cap on Tourist Accommodation Units (TAUs) consistent with the analysis in the 2012 RPU EIS/RTP EIS/R; as a result, the impacts of these de-facto TAU units have not been counted.

*We recommend the IC/IEC analysis be revised to reflect the potential increases in traffic associated with the conversions of uses (e.g. commodities as well as single-family homes converted to de-facto TAUs, etc.), and the morphing of TAUs (based on the RPU’s definition of TAU size compared to the size of existing ‘transferred’ units<sup>16</sup>). The 2017 RTP analysis in the IC/IEC builds on the 2012 RTP analysis and 2015 Threshold Evaluation Report, which include assumptions regarding the transfer of such units, estimates regarding the number of existing and bonus units, and potential future units.<sup>17</sup> This information can be used to assess the potential increase in the number of overnight accommodations (e.g. the number of*

<sup>11</sup> Ordinance No. 2016-01, adopted 1/27/2015, Revisions to Chapter 50.10.8.

<sup>12</sup> <http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan>

<sup>13</sup> FOWS & TASC comments on DEIR/S, included in TBAP Final EIR/S on p. 3.3-37 to 3.3-40; response provided on p. 3.3-141

<sup>14</sup> Discussed in FOWS & TASC comments on final TBAP EIR to RPIC, 11/14/2016, p. 5-7 (attached)

<sup>15</sup> See detailed comments in 4/21/2015 FOWS comments to the Regional Plan Implementation Committee (attached)

<sup>16</sup> “Provided the conditions in subparagraph 1. above are met, 80 percent of the tourist accommodation units on the receiving site may be up to 1,200 square feet, with kitchens, and no more than 20 percent of the project’s floor area may contain units not to exceed 1,800 square feet, with kitchens.” (TRPA Code 51.5.2.K)

<sup>17</sup> 2012 RPU DEIS, Appendix E, Part 7; 2015 Threshold Evaluation Report, Chapter 12.



## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

*'bedrooms' – which better reflect the overnight capacity of the units - rather than the number of TAUs) compared to existing conditions*

*The RTP (and RPU) should also include specific requirements for future project-level environmental impact analyses to compare the existing number of bedroom units associated with a sending unit(s), a single-family home that is being converted to a vacation rental use, and/or the CFA that is being used to develop the TAU (through the conversion allowances in the RPU and TBAP), to the post-project number of bedroom units and the associated increase in vehicle trips and other environmental impacts. For example, the RPU/RTP could include Code requirements for future project analyses to include a comparison of the existing number of bedroom units to the proposed number of bedroom units and to disclose and mitigate the associated human and vehicle population increases.*

*As noted in the 3/20/2017 comments submitted by the LTSLT, conversions of single-family homes to de-facto TAUs need to be regulated by TRPA. The current lack of regulation allows for growth beyond what was analyzed in the 2012 RPU EIS.*

**Impacts from projects in Squaw Valley and Martis Valley:**

It is unclear whether the IS/IEC incorporates the most recent estimates included in the Village at Squaw Valley Specific Plan (VSVSP) EIR<sup>18</sup> and Martis Valley West Parcel Specific Plan (MVWPSP) EIR.<sup>19</sup> Appendix D discusses efforts taken to match forecasts with entry volumes modeled by adjacent MPOs,<sup>20</sup> however the document does not appear to include the more recent estimates of the additional in-Basin traffic that will be generated by these two projects (although the forecasts of potential traffic in both EIRs underestimated peak unit occupancy, as noted in numerous public comments on each EIR).

*We recommend the IC/IEC be revised to incorporate the most recently available information regarding vehicle trip impacts from these adjacent Specific Plans, accounting for actual peak occupancy rates (rather than the reduced occupancy used in the associated EIRs), and/or if these impacts are reflected in the forecasts, the IC/IEC should be revised to clarify this.*

**Local VMT:**

As noted in our comments on the TBAP (see excerpt from 12/1/2016 letter to APC; attached), the 2015 Threshold Evaluation Report includes data showing that VMT has increased in the North Shore and decreased in the South Shore.<sup>21</sup> As documents continue to review significance based solely on the "regional" VMT standard, impacts at the local scale are not being adequately

<sup>18</sup> <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/villageatsquawvalley>

<sup>19</sup> <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/martisvalleywestparcel>

<sup>20</sup> "To reflect the potential growth along the two north entry-corridors, TRPA staff made slight adjustments to the hotel-motel occupancies as well as to beach attractiveness factors to influence greater day-use visitation from the two projects along the SR 89 and SR 267 corridors. The purpose of the analysis was intended to match the forecasted entry volumes forecasted in the Squaw and Martis Valley analyses to be commensurate with the forecasted model values. The comparison of TRPA modeled traffic entry volumes and the modeled entry volumes by adjacent metropolitan planning organizations is shown in Table D.17, below." (draft RTP, App. D, p. D-26)

<sup>21</sup> Table 12-15.



## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

addressed. The 2017 RTP fails to discuss this distinction, and the IC/IEC includes no analysis of these local impacts. Although TRPA has initiated review of the VMT standard beginning with the formation of the Transportation Measures Working Group (as well as the Threshold Update Strategic Initiative process), the environmental impacts of the RTP occur on localized scales and should be analyzed and disclosed as such.

*We recommend the RTP include more discussion of the differences in transportation impacts and trends in the north/west shore versus the south/east shore areas of the Basin (at a minimum, as we understand more analysis will be required in order to select appropriate boundaries), and that future projects and plans be required to evaluate these impacts separately. The proposed “No new VMT/vehicle trips during peak periods” approaches discussed previously should be evaluated based on both the regional and local scales.*

**Existing conditions (2014 baseline year):**

The IC/IEC relies on 2014 as the baseline year to represent existing conditions for transportation. As noted previously, we understand that the year chosen to represent existing conditions cannot be a moving target and the analysis process began well over a year ago, however we are concerned that recent increases in traffic (beginning in 2015 through the present) are not sufficiently reflected by the 2014 baseline year (the LTSLT notes similar concerns in their 3/20/2017 comments). The 2016 TBAP EIR/S (released over eight months before the RTP IC/IEC) included updated 2015 estimates regarding VMT,<sup>22</sup> however no similar process was done for the 2017 RTP analysis. Further, 2015 traffic counts within the Basin should be available from the state departments of transportation (e.g. 2015 California Department of Transportation traffic counts<sup>23</sup> and Nevada Department of Transportation VMT estimates<sup>24</sup> are already available online) and 2016 traffic counts should also be obtained, where available.

*At a minimum, the IC/IEC should include the most recent transportation data available and discuss how it compares to the 2014 baseline conditions as well as trends in the Basin beginning in 2015. Further, the IC/IEC analysis and subsequent RTP requirements should include an additional ‘cushion’ wherein the plans account for more traffic than is represented by the 2014 baseline in order to err on the side of caution. For example, if recent traffic counts reveal a 3% increase in VMT (and/or peak trips),<sup>25</sup> the RTP should be adjusted so that it incorporates additional traffic reduction measures to address the additional 3% VMT (and/or peak trips) compared to what is represented in the 2014 baseline. In other words, if the 2017 RTP calls for a 7% reduction in traffic from the 2014 baseline year, but traffic counts from 2015 indicate traffic has increased by 3%, then the 2017 RTP should plan to ensure a 10% reduction in traffic, not 7%. This analysis should separate local and regional impacts, such that increases in one part of the Basin are addressed even if traffic has decreased in other areas of the Basin.*

<sup>22</sup> Placer County Tahoe Basin Area Plan and Tahoe City Lodge Final EIR/EIS, p. 3.1-5 and 3.1-6.

<sup>23</sup> <http://www.dot.ca.gov/trafficops/census/>.

<sup>24</sup> <http://www.nevadadot.com/home/showdocument?id=4436>

<sup>25</sup> Numbers in these examples are hypothetical.

## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

**Traffic-related impacts to public health and safety:****“Visit Tahoe” Category and peak exit congestion:**

Peak visitor traffic primarily exiting the Tahoe Basin has become increasingly problematic in recent years,<sup>26,27</sup> resulting in hours-long traffic jams<sup>28</sup> that effectively block roadways which have traditionally provided a means for emergency access. The RTP categorizes this traffic within the “Visit Tahoe” category, reporting that these trips account for 25% of the daily vehicle trips in the Basin.<sup>29</sup> However, the greatest impact from vehicles in this category occur on Sundays/Holidays, days after events, or heavy snow periods (as cited previously), thus the average daily vehicle metric does not appear to sufficiently reflect the source of these vehicle impacts (e.g. resident/commuter, recreation, or visitor).

*We request the 2017 RTP also identify what proportion of the “Sunday/Holiday” gridlock exiting the Basin is associated with this class of drivers, as we anticipate it is far greater than 25% on affected peak days and such information is important to understanding the environmental and public safety impacts from these vehicles.*

**Measures to reduce peak exiting visitor traffic:**

Entry/exit traffic is identified as a significant public concern.<sup>30</sup> Congestion is noted as a primary consideration for the 2021 RTP to address (although the 2012 RPU amendments and the 2017 TBAP allowed for even more congestion by permitting more degraded Level of Service [LOS] conditions).<sup>31,32</sup> While extensive gridlock on peak days is currently a major public health and safety concern, the 2017 RTP does not adequately consider immediate actions to help mitigate these impacts or include specific and enforceable short- and long-term actions that can be taken to ensure emergency access is available when needed, although the RTP notes the importance of evacuation plans.<sup>33</sup> We recognize this will require coordination with public service entities, however the 2017 RTP should include specific actions TRPA can implement and related performance measures. Notably, the 2007 Angora Fire started on a *Sunday* morning and advanced swiftly. Had the roadways in that neighborhood been congested as they have been over

<sup>26</sup> <http://www.sacbee.com/news/local/article129393194.html>

<sup>27</sup> <http://southtahoenow.com/story/03/10/2017/city-county-state-and-law-enforcement-officials-meet-discuss-tahoe-traffic-jams>

<sup>28</sup> <http://southtahoenow.com/story/03/05/2017/heavy-traffic-south-lake-tahoe-city-advising-motorists-stay-town-longer>

<sup>29</sup> “... Visit Tahoe, the long distance trips to and from the Region, by visitors and commuters accounting for 25 percent of daily vehicle trips.” (RTP, p. 1-14)

<sup>30</sup> “Multiple themes and goals generated from the public are integrated into Linking Tahoe... Increasing quality-of-life and environmental benefit through reducing the high numbers of cars arriving and leaving the Region at the same time.” (RTP, p. 2-9)

<sup>31</sup> Policy T-10.7: “These vehicle LOS standards may be exceeded when provisions for multi-modal amenities and/or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users.”

<sup>32</sup> “In recognition of the LOS conditions in the Tahoe City Town Center, Area Plan Alternatives 1 through 3 would revise the LOS standards to allow LOS F during peak periods in town centers (Area Plan Policy T-P-6).” (TBAP DEIR/S, p. 10-16)

<sup>33</sup> “Wide-scale evacuation plans for the Lake Tahoe Region are necessary to address possible large-scale security incidents and natural disasters such as fires, earthquakes, and tsunamis.” (RTP, p. 3-34)

## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

the past two years, the situation could have been far more dire. As noted below, more needs to be done now to set the stage for aggressive measures that can reduce vehicle travel to and from the Basin (e.g. the road toll/user fee approach and out-of-basin parking lots with shuttles [more details provided below]).<sup>34</sup>

*The 2017 RTP should discuss existing actions and efforts that are being taken to help address emergency access through neighborhoods associated with the “Sunday/Holiday” gridlock from visitors leaving the Basin (for example, El Dorado County Supervisor Sue Novasel recently explained the development of a “traction ordinance” related to chain requirements that will increase the authority to control chain requirements on county roadways<sup>35</sup>).*

*The RTP should also explore additional options that can be taken in the interim during these peak conditions to improve emergency access, as well as initiate clear and aggressive efforts to pursue additional traffic-related measures, such as the Adaptive Roadway Management option (discussed more below).*

### Road tolls/user fees:

The concept of a Basin entry fee/road toll has been discussed in TRPA documents for over forty years.<sup>36</sup> Such a fee could provide much-needed funding for public transit (as discussed below, funding is one of the biggest impediments to a more effective system and funding shortfalls are substantial<sup>37</sup>) as well as disincentivize the use of personal automobiles for traveling to the Basin<sup>38</sup> and incentivize carpooling, public transit use, and other ride-sharing concepts among visitors, thereby reducing traffic impacts to the environment and public health and safety. We understand TRPA has been working with the Trans-Sierra and Mega-region partners,<sup>39,40</sup> however such efforts are long-term, and while improved regional transit to and from the Tahoe

<sup>34</sup> This concern was expressed by Board member Shelly Aldean during the 2/23/2017 annual retreat.

<sup>35</sup> <http://www.tahoe-daily-tribune.com/news/gps-savvy-tourists-clogging-lake-tahoe-residential-streets/>

<sup>36</sup> “The CTRPA plan also recommends a basin user fee (a concept developed by TRPA) to finance the multi-modal transportation systems in the Basin.” (Draft EIR, Regional Transportation Plan Update, February 1976. California Tahoe Regional Planning Agency. Page 95)

<sup>37</sup> “That leaves the Region with an \$3.8 billion funding shortfall over the next several decades to implement the fully envisioned system.” (RTP, p. 4-3)

<sup>38</sup> “Road user fees could be imposed in a variety of different ways that comply with Compact restrictions—for instance, as a congestion toll within the Region, or as a parking fee. This would provide a cost disincentive to driving and a cost incentive to utilizing the intercept lots and shuttles.” (TRPA RPU FEIS, Volume 1, p. 3-462)

<sup>39</sup> “The Trans-Sierra Transportation Coalition is a group of 11 California and Nevada counties, federal and state agencies, stakeholders, and citizens from Northern California and Northern Nevada committed to ensuring that the transportation system in the greater Trans-Sierra Region supports economic vitality and preserves an excellent quality of life. Mega-Region partners currently collaborating with the Tahoe Region include but are not limited to Washoe Regional Transportation Commission, Carson City Metropolitan Planning Organization and Sacramento Area Council of Governments.” (RTP, p. 2-6)

<sup>40</sup> “Coordination is already underway to identify solutions and prepare to implement more frequent and convenient connections between Lake Tahoe and northern California and Nevada cities including Truckee, Reno, Sacramento, Bay Area, Stockton, and Auburn. Concepts for new rail and transit services with transit centers that incorporate park and ride lots are being developed and are included on the plan’s unconstrained, unfunded project list. Through continued work with the Trans-Sierra Transportation Coalition these strategies will be refined and poised for inclusion and implementation through the 2021 RTP.” (RTP, p. 2-6)

## FOWS &amp; TASC Comments on draft 2017 RTP and RTP IS/IEC

Basin is a necessary part of providing an alternative to automobile use, incentives alone will not likely be enough; a road toll/user fee would help disincentivize the use of the private automobile. In fact, the 2012 RPU response to comments on the Final EIS specifically outlines the authority TRPA has to implement this measure (Volume 1, p. 3-462 to 3-463; excerpt attached). TRPA Governing Board members have also recently raised this option, noting that it would be best to begin efforts sooner rather than later as it will take substantial time and collaboration to implement such a measure.<sup>41,42</sup>

Sufficient information exists to show the nexus between vehicle use and impacts to Tahoe's roadways and environment. Further, a substantial proportion of Tahoe's visitors come from the Bay Area and other places in California where roads commonly have tolls on them.<sup>43</sup> This is not a new or innovative concept. The idea of charging road tolls/user fees to enter natural recreational areas is also not new – National Parks already implement such an approach (although Lake Tahoe is not a designated National Park, the Basin's significance as a natural resource and status as a federally-designated Outstanding National Resource Water prove Tahoe's special status is undisputable).

*We ask the TRPA to immediately and aggressively pursue the road toll/user fee option. The 2017 RTP should include a timeline for interim milestones related to implementing this approach.*

### Adaptive Roadway Management:

The 2017 RTP identifies Adaptive Roadway Management as an option to assist with travel during peak periods; this approach may also be combined with priority transit services to incentivize the use of public transit.<sup>44</sup> However, the 2017 RTP notes that additional funding

<sup>41</sup> "Ms. Aldean said if there were no impediments, toll booths would be the solution to regulate the number of people in the Basin. Toll booths will take some legislative action but should be considered." (2/22/2017 GB meeting minutes, p. 9)

<sup>42</sup> E.g. "Ms. Aldean suggested including a Basin user fee in the range of options for the survey. It will [be] complicated and will require political will and some Legislative changes. If there is an appetite for people who live in the Basin or just outside the Basin to impose an entrance fee into the Basin, it would be a long term source of funding and is a solution to the increased popularity of Tahoe as a destination resort. Now is the time to start having this discussion. Surveying the residents who live in the Basin would be the first step. It needs to be included as a funding option and also for the long term, they need to find funding sources or an endowment. Mr. Sass suggested in the past that the Board needed to start using their political influence amongst the Board members to get the...user fee rolling down the track. He does not believe the portfolio approach will work. Locals and the counties are not going to approve a tax to fund transportation in the Basin. There would need to be caveats on the user fee, but in lieu of that it is the simplest and easiest solution." (2/23/2017, GB meeting minutes, p. 23-24)

<sup>43</sup> i.e. "The majority of visitors to North Lake Tahoe make a three-hour (or less) drive on I-80, from the Sacramento and San Francisco Bay areas. These account for 71% of winter visitors and 68% of summertime visitors." (Trans Sierra Transportation Plan, March 2015)

<sup>44</sup> "Another example is prioritizing roadway access for transit and active transportation during peak times at peak locations to manage congestion and encourage less impactful travel methods. Adaptive roadway management on U.S. Highway 50, SR 89, and SR 267 would significantly improve entry and exit congestion during high peak visitation seasons and visitation at high-use recreation destinations." (RTP, p. 3-31)



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sources and collaboration will be necessary to implement this option,<sup>45</sup> and it is included in the “unconstrained” project list.<sup>46</sup>

*We request that Adaptive Roadway Management be prioritized among transportation projects and implemented as soon as possible (we herein reference the LTSLT’s 3/20/2017 detailed comments and recommendations). In the meantime, no new projects or events which will increase peak hour vehicle trips into and out of the Basin should be approved (regardless of whether the no VMT/vehicle trip increase measures previously discussed are included).*

### Parking:

The IC/IEC concludes the RTP’s impact on parking would be less than significant and explains that future project-level reviews are expected to address individual project impacts.<sup>47</sup> However, parking impacts are both a local and regional problem and require more extensive coordinated planning than can be provided project-by-project. In addition, as noted by transportation expert Greg Riessen, PE (in comments submitted by the LTSLT [cited throughout]), each additional parking space constructed means more VMT and congestion and resulting air and water pollution (excerpt below), yet the RTP’s policies do not call for a *net reduction* in parking spaces.

“Fundamentally, imposing a minimum parking requirement is the equivalent of requiring existing and new development to generate Vehicle Miles Traveled (VMT) and exacerbate traffic congestion. Each additional parking space constructed deepens the hole of air and water quality impacts that the Tahoe Basin is trying to climb out of. The report confirms this connection on page 57: “It is in the public interest to minimize parking wherever possible in order to...encourage non-auto transit modes.” However, there is no mention of VMT in the report, specifically, the relationship between parking and VMT. This document should describe how minimizing the parking supply serves to reduce VMT and addresses the TRPA’s VMT threshold, while increasing parking supply will increase VMT and undermine threshold attainment. Similarly, there is no mention in the report of the relationship between increased parking supply and worsened traffic congestion.” (12/9/2016 LTSLT comments on final TBAP DEIR/S, from transportation expert Greg Riessen)

Mr. Riessen’s 12/9/2016 comments also note that there is not a lack of existing parking spaces, but rather a lack of parking *management* (the latter concept is discussed substantially in the 2017 RTP<sup>48</sup>). What should be gleaned from this information is two-fold:

<sup>45</sup> “However, adaptively managing the Region’s entry and exit roadways, U.S. 50, SR 89, and SR 267, cannot be realized without new funding sources, and agency collaboration and buy-in (unconstrained project list).” (RTP, p. 3-36)

<sup>46</sup> See “Table 3.2: Transit Services: Existing, Constrained and Unconstrained.” (RTP, p. 3-14)

<sup>47</sup> “8. Would the project result in changes to existing parking facilities, or demand for new parking?...As discussed in Chapter 2 of the 2012 RTP/SCS EIR/EIS, the 2012 plan would include projects that have the potential to increase parking demand, but would also include projects that would decrease the demand for parking and projects that would increase or improve parking facilities. Individual transportation projects would be subject to, or are currently undergoing, project-level environmental analyses to determine project-specific impacts of each project, including providing adequate parking for those projects that would increase demand. This would also be the case with the 2017 RTP/SCS. This impact would be less than significant.” (IC/IEC, p. 58)

<sup>48</sup> “Parking Management: The price and availability of parking has a significant impact by shaping how people decide to travel. Where parking is free, disorganized, or un-enforced, as it is along the Region’s state highways which provides access to many of Tahoe’s most popular recreation areas, roadsides can become crowded with parked cars. This uncontrolled parking leads to issues with roadside erosion and public safety. Where parking is

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- 1) Additional parking spaces should be discouraged/prohibited and existing parking spaces reduced in order to reduce vehicle use (this does not mean new or redevelopment projects would not be allowed to construct new spaces in their project areas, however a system could be in place to ensure spaces elsewhere are reduced, just as there are coverage and other commodity transfer programs); and
- 2) It is more effective to better manage existing parking spaces to address peak needs rather than simply construct additional spaces.

The LTSLT's 3/20/2017 comments on the draft 2017 RTP also discuss the need for improved parking management and for adherence to the 2012 RPU's more aggressive reductions in parking minimums, and include additional comments from Mr. Reissen (incorporated herein). We support the 2017 RTP's focus on "parking management" as part of its strategy;<sup>49</sup> however, there is no mention of *reducing* the number of parking spaces in the Basin. At best, the RPU and subsequent Area Plans may strive to reduce the number of *new* spaces compared to previous minimum parking requirements<sup>50</sup> – but this still means *additional* parking spaces will be constructed. Further, there are many other options for parking management which can address parking needs, reduce vehicle use, and incentivize transit use<sup>51</sup> that have not been incorporated into Area Plans or the RPU but can and should be included in the 2017 RTP.

perceived as free and unlimited people are less likely to use transit to access those areas or pay for parking in a safer more organized location. Successful parking management strategies help disperse where and when people travel. Parking strategies are dependent on the location and use of an area. For recreational areas, strategies could include combinations of no time limit parking lots with higher prices, limited and short-term roadway parking with medium prices, and free shuttle service. Through corridor planning, TTD and land management partners are exploring parking strategies that support improved access to recreation areas. These include a pilot project to test parking pricing along Tahoe's East Shore. This project will also explore using technology to let travelers know about the availability and price of parking in the area via smart phones, online, or changeable message signs." (RTP, p. 3-11 to 3-12)

<sup>49</sup> i.e. "Transportation system services and programs can respond to these varying conditions with dynamic traffic and parking management, diverse seasonal public transit services, real-time travel information, and incentives to use public transit, mobility hubs, bicycling and walking trails, and zero-emission electric vehicles." (RTP, p. 1-17), and as discussed during the 2/22/2017 TRPA GB hearing: "Mr. Haven said the Regional Transportation Plan wants to create an incentive and disincentive program to drive transit usage. As the programs are implemented and the tracking of ridership is done then that could be a future discussion... Mr. Cashman asked what types of incentives and disincentives are they considering... Ms. Beryl said parking management, dynamic pricing, and limitations of parking in certain areas..." (2/22-2/23/2017 GB meeting, minutes, p. 6)

<sup>50</sup> Response to comment number 12-42 in the TBAP FEIR/S: "The comment pertains to parking, both for the Area Plan and for the Tahoe City Lodge. Regarding Area Plan parking impacts, the actual parking demand and supply would depend on specific project projects, their design, and future land uses at a finer level of specificity than can be identified in the Area Plan (as specific types of commercial land uses, for example, have differing levels of parking demand), future shared parking arrangements, the degree to which future developers take advantage of in-lieu fee programs, and other factors. As a result, it would be speculative to identify a specific number of future parking spaces that would be needed or supplied. What can be concluded at a plan level of analysis is that the parking standards that would be adopted as part of the Area Plan would result in a lower number of additional future parking spaces in town centers associated with new development than would occur if the new parking standards are not adopted." (TBAP FEIR/S, p. 3.3-150) [Emphasis added]

<sup>51</sup> Examples were provided by Mr. Reissen in the 12/9/2016 comments previously cited.

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In addition, we support the 2017 RTP's policy to focus on improved transportation strategies, including parking management, for popular recreation sites,<sup>52</sup> however the RTP should include a policy to prohibit additional parking spaces associated with expansions of existing recreational facilities (for example, the proposed expansion of the Lake Tahoe Golf Course into the Washoe Meadows State Park is likely to include a substantial number of new parking spaces). As noted above, this does not mean no new spaces could be constructed at a project site, however spaces would have to be reduced elsewhere in the project's vicinity (taking location and site-specific issues into consideration).

### Funding:

Funding has been one of the primary impediments to implementation of a sufficient transportation system for decades.<sup>53</sup> The RTP notes that additional dedicated funding sources are necessary to achieve the long term vision, and that TRPA and partners will be working to identify such sources over the next four years.<sup>54</sup> Funding problems are exacerbated by the potential for existing funding levels to drop.<sup>55</sup> The RTP currently estimates a shortfall of \$3.8 billion in funding for the full transportation vision.<sup>56</sup> As just \$2 billion in funding is forecast over the next 23 years (assuming no reduction in existing levels),<sup>57</sup> this means funding will almost have to *triple* to achieve the full network. Without adequate funding, transportation networks cannot be sufficiently improved and existing problems will likely only get worse, especially as the populations of the Northern California and Nevada "Mega-Regions" grow by millions.<sup>58</sup>

<sup>52</sup> Policy 5.2: Provide multimodal access to recreation sites. Encourage collaboration between public lands managers, departments of transportation, transit providers, and other regional partners to improve year-round access to dispersed recreation activities. Strategies could include active transportation end-of-trip facilities, transit services, parking management programs, and incentives to use multi-modal transport. (RTP, p. 2-16)

<sup>53</sup> "This 2017 plan is a blueprint for a regional transportation system that also begins to address inter-regional travel demand. To achieve the long-term vision, TRPA and partners will need to collaborate to identify and source dedicated regional revenue sources to meet the larger need of comprehensive bus and rail service coupled with park and ride lots that will provide options to private vehicle use. This policy debate has been ongoing since the 1990s without resolution." (RTP, p. 4-3) [Emphasis added]; also see previous cite to 1976 CTRPA RTP DEIR: "The CTRPA plan also recommends a basin user fee (a concept developed by TRPA) to finance the multi-modal transportation systems in the Basin." (p. 95)

<sup>54</sup> "Now with a clearer understanding of the size of the demand, the time is ripe to engage the matter of regional funding. While we move forward to build seamless transit and active transportation systems within the Lake Tahoe Region, over the next four years TRPA and partners have the opportunity to identify new funding streams and be poised in 2021 to fully support the build out of the transportation system's long-term vision. This is necessary to ensure the preservation of the environment, residential quality of life, and quality experience for the millions of people who travel to the Lake Tahoe Region." (RTP, p. 4-3)

<sup>55</sup> "The estimated levels of future funding by the various transportation agencies within the Region assume that future federal and state funding will mirror historic levels. There is no guarantee that this will occur and the estimated shortfalls may increase dramatically if our state and federal partners cannot sustain current levels of investment into the future." (Trans Sierra Transportation Plan, p. 29)

<sup>56</sup> "The total amount of funding needed to deliver the constrained and unconstrained projects, operations, and programs for the life of this plan is just over \$5.8 billion. That leaves the Region with an \$3.8 billion funding shortfall over the next several decades to implement the fully envisioned system." (RTP, p. 4-3)

<sup>57</sup> "An estimated \$2 billion in revenue is anticipated over the 23-year forecast period." (RTP, p. 4-3)

<sup>58</sup> "The wide open spaces and attractions of the Trans-Sierra Region straddle what has been dubbed the Northern California megapolitan, the fast growing urban area stretching from San Francisco, through Sacramento, to Reno. The Northern California megapolitan is home to some 15 million people today, and this number is expected to



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While efforts to garner adequate funding have been underway for decades, and the recent reclassification of the Tahoe Metropolitan Planning Organization (TMPO) to an urban MPO<sup>59</sup> may help Tahoe qualify for additional federal funding, this will still not be enough to cover the shortfall. Further, given Tahoe's relatively small year-round population, it is generally recognized as infeasible to place the cost burden for such a network on local full-time residents.<sup>60</sup> While "local self-funding" approaches may help raise a portion of these funds, the 2017 RTP recognizes that such approaches are insufficient.<sup>61</sup> However, the 2017 RTP does not discuss the potential funding that could be required of corporations and other large businesses (e.g. Edgewood, Vail, etc.) to help subsidize the cost of transit. As noted in the LTSLT's 3/20/2017 comments, additional requirements and incentives for local employers are also an option.

We support TRPA's efforts to explore additional funding mechanisms, including the options listed in Chapter 4 of the RTP (e.g. regional dynamic pricing strategies), although these options will not be sufficient to address the \$3.8 billion funding gap. However, as noted previously, a road toll/user fee has the potential to raise substantial funding and will provide a clear nexus between the road toll/user fee and the expenditure on Tahoe's transportation systems. For example, the 2017 RTP notes that recent information indicates roughly 10 million vehicles travel to the Basin each year. If a road toll/user fee were applied to each vehicle upon entry to the Basin, funds raised could be as follows (this is an overly simplistic view that is only meant as a general example):

\$5 per vehicle = \$ 50 million/year; sum for 23 years = \$1.15 billion  
 \$10 per vehicle = \$100,000 million/year; sum for 23 years = \$2.3 billion  
 \$15 per vehicle = \$150,000 million/year; sum for 23 years = \$3.45 billion

Such options would clearly go a long way in raising the additional **\$3.8 billion** necessary to implement the full transportation vision.

*We strongly urge TRPA to immediately and aggressively pursue a road toll/user fee option. Interim steps that could be incorporated into the 2017 RTP may include the formation of a Governing Board Committee to discuss political and other implications and associated solutions, and a technical working group to explore examples of how such a system may be installed and operated based on an examination of other locations where such road tolls/user fee systems are in place as well as coordination with other involved entities. TRPA could also undertake a Strategic Initiative to pursue this option.*

increase by an estimated 25-30% by the year 2035. The natural beauty, year-round recreational opportunities, and solitude of the Trans-Sierra Region are a relatively short drive from these urban areas. This proximity makes the Region a key contributor to the overall quality of life for the millions that live and work in the Northern California megapolitan." (Trans-Sierra Transportation Plan, p. 9)

<sup>59</sup> "In February 2016, the FAST Act upgraded TRPA's status to an urban metropolitan planning organization, which requires TRPA to develop, establish, and implement a formal congestion management process." (RTP IS/IEC, p. 3-50)

<sup>60</sup> i.e., "Visitation far outstretches anything our permanent population can do." (Carl Hasty, TTD, 2/22/2017 GB hearing, minutes, p. 24)

<sup>61</sup> "Local self-help funding is needed to match federal and state funds, but also require voter approval for initiation and renewal. These types of sources can levy relatively large amounts of funding, but are insufficient as the sole source that the Lake Tahoe Region relies on to achieve its long-term transportation vision." (RTP, p. 4-9)

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**Other recommendations:****Additional land use options:**

As detailed in the Petition for Writ of Mandate (Petition) for the lawsuit recently filed by the California Clean Energy Committee (CCEC) against Placer County's approval of the Tahoe Basin Area Plan (TBAP),<sup>62</sup> there are additional actions that could be taken to mitigate transportation impacts (and the associated greenhouse gas emissions, air and water pollution, noise, and public health and safety threats). Although the Petition focuses on Placer County's approval of the TBAP, the actions recommended in the Petition, as well as comments on the draft and final EIR/S submitted by CCEC, FOWS and TASC, and the League to Save Lake Tahoe,<sup>63</sup> are also representative of potential RPU/RTP amendments including additional measures to reduce transportation impacts (and related environmental impacts). These recommendations should be included in the 2017 RTP and evaluated in the IS/IEC.

**Additional information:**

According to the IS/IEC, surveys have been performed within the last four years to gather updated information regarding public views on transportation.<sup>64</sup> It is unclear what the questions were or what information was gathered, however we recommend the following information be obtained (or if it already has, we request this information be provided to the public and included with the RTP documents):

- What frequency of transit service to and from the Tahoe Basin would be necessary for a substantial number of visitors to use public transit into the Basin?
- How much of an incentive would be provided by priority access for transit during congested conditions (through Adaptive Roadway Management)?
- How many hours in gridlock is too many hours (recognizing many visitors deal with regular gridlock every work day)?
- What is the importance of a transit service which allows pets (in other words, how many pet owners would use transit if pet-friendly transit service options that provided convenient and frequent transit service were available<sup>65</sup>)?
- What amenities are necessary to encourage use (e.g. bathrooms on the bus, Wifi, seat comfort, etc.)?
- What will it take to overcome the discouragement of using transit for visitors with substantial luggage/gear?
- What is necessary to encourage visitors with children to take transit?

<sup>62</sup> <http://friendswestshore.org/wordpress/wp-content/uploads/2017/01/Verified-Petition-for-Writ-of-Mandate.pdf>

<sup>63</sup> <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/tahoebasinap>

<sup>64</sup> "The policies, programs, and projects included in the 2017 plan have been vetted, modified and updated based on feedback received through multiple public and stakeholder workshops, surveys, and meetings held over the last four years. Over 800 people were engaged through qualitative and quantitative methods specifically for feedback on the 2017 RTP/SCS." (RTP IS/IEC, p. 2-1)

<sup>65</sup> This question stems from the 2017 RTP's reference to allowing dogs: "Hubs would be coupled with frequent transit that carries recreation equipment, luggage, and could allow dogs, with services reservable online." (p. 4-6).

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- If these issues were addressed to visitors' satisfaction, what would their preference be with regards to getting from their homes to a location where they would board public transit to the Basin? For example, would park and ride lots be sufficient? Would such lots need to be manned for security to make users feel comfortable leaving their vehicles behind?

Although such survey questions would need to be determined by a professional in the field, these questions represent the type of information that would be important to assessing how to encourage visitors to use transit into and out of the Basin. Unfortunately, it is not likely to be an "if you build it, they will come" situation.

*We request where such information has already been obtained, it be provided to the public and included with the 2017 RTP documents. Where such information has not been obtained, we recommend TRPA and partners conduct an appropriate survey of summer and winter visitors. We would also be happy to distribute surveys or other information to our members. In addition, we recommend TRPA gather similar information from transit networks in other locations where there is more successful transit use.*

### Conclusion:

In conclusion, we support the features of the 2017 RTP which will incentivize non-automobile modes of travel and increase public transit options, however we remain concerned that additional immediate actions are necessary to begin what is no doubt an intensive process to address some of the most impactful transportation problems in the Basin. It will be important for TRPA to take a strong leadership role to implement additional measures supporting adequate transportation funding, such as the road toll/user fee option. In the meantime, we also ask TRPA to adopt regulatory changes to prevent increases in VMT and peak vehicle trips associated with new projects and special and temporary events so that existing traffic problems are not exacerbated. We would welcome the opportunity to work with TRPA and other stakeholders to craft such policies and engage the public in their development.

**Letter  
12****Sierra Club, Tahoe Area Sierra Club**  
June 30, 2017

- 12-1 The commenter states that the calculations regarding VMT, level of service (LOS), and daily vehicle trip ends are not correct and do not use the best available transportation planning information.
- The Draft EIR/EIS/EIS traffic analysis was performed using industry standard Highway Capacity Manual 2010 and Institute of Transportation Engineers trip generation rates (from the Trip Generation Manual, 9th Edition) methodologies for LOS and Daily Vehicle Trip End calculations. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided. Also, see Master Response 1, “Adequacy of VMT Analysis.”
- 12-2 The commenter provides general statements that the scenic simulations do not agree with the project description, and that multiple resource sections (e.g., transportation, visual resources, noise, and economic impacts) include contradictory information. This comment is general in nature and is a summary of more detailed comments included later in the letter. Please refer to responses to the more detailed comments on this subject.
- 12-3 The commenter suggests the document includes technical inadequacies and the topics that are deficient. The comment is a summary of more detailed comments included in the submittal. Please refer to responses to the more detailed comments on this subject.
- 12-4 The commenter suggests that the project would clearly result in additional significant and unavoidable impacts and the environmental document does not provide the evidence necessary to support the environmental findings TRPA will have to make. The comment is a summary of more detailed comments included in the submittal. Please refer to responses to the more detailed comments on this subject.
- 12-5 The comment includes a contents list for the remainder of the comment letter. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR/EIS/EIS.
- 12-6 The commenter describes that the project will change the South Stateline area and roadway network, states that decision makers need to have the best available information upon which to evaluate the project, and suggests the Draft EIR/EIS/EIS does not provide this for many resource impacts. With respect to the project objective pertaining to reducing overall vehicle delays through improved motor vehicle mobility, the commenter asserts that improving LOS will inevitably lead to more vehicle use and TTD and TRPA should focus on other ways to address traffic issues. Also see Response to Comments 12-11 and 12-24, which address LOS issues. The comment is general in nature and is noted for consideration by decision makers.
- 12-7 The commenter suggests there are other ways to achieve the project’s goal to “decrease dependence on the use of private automobiles” and that more transit resources are needed for visitor traffic. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR/EIS/EIS. The proposed project includes multimodal transportation features, including transit. The comment is noted for consideration by decision makers.
- 12-8 The commenter suggests there are other ways to reduce traffic volumes through the tourist core and improve walkability that should be explored and states the project may reduce cut-

through traffic, but would also remove a large portion of the neighborhood that currently experiences the cut-through traffic.

The route experiencing the greatest cut-through traffic volumes is Chonokis Road, which would not be removed under any of the project alternatives. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR/EIS/EIS. The comment is noted for consideration by decision makers.

- 12-9 The comment pertains to the project objective to “improve visual and environmental conditions within the tourist core.” The commenter states that improving aesthetics in the tourist core should not be at the expense of the rural and natural visual environment outside the tourist core and suggests that there are other ways to improve aesthetics than with implementation of the project. These comments are detailed later in the comment letter. Please refer to responses to the more detailed comments on this subject.
- 12-10 The commenter suggests that the project’s goals to improve connectivity, reliability, travel times, and operations of public transportation modes, as well as to make public transportation modes more effective with better visibility, etc., can be achieved in a variety of ways and that it is not necessary to expand roadway capacity to meet them. The commenter also suggests that the project would not enhance access to Van Sickle Bi-State Park.

Alternatives A and E would not result in changes to the roadway network, because Alternative A is the No Action Alternative, which proposes no improvements, and Alternative E only proposes improvements to pedestrian facilities elevated over the existing US 50 alignment (all roadway lane configurations would remain consistent with existing conditions).

Alternative C would result in a decrease in number of roadway lanes, which is closely related to roadway capacity, in the project site. The existing US 50 alignment would be converted from a five-lane, two-way roadway to a two-lane, one-way eastbound roadway between Park Avenue and Lake Parkway, and the existing two-lane, two-way Montreal Road/Lake Parkway (southeast of existing US 50) would be converted to a two-lane, one-way westbound US 50 segment between Pioneer Trail and Lake Parkway.

Depending on the roadway segment, alternatives B and D would result in either no change, a localized decrease, or a localized increase in number of roadway lanes. The existing US 50 Segment through the project site has a five-lane cross section, Montreal Road has a two-lane cross section, and Lake Parkway, north of existing US 50, currently has a three-lane cross-section. For both alternatives, Montreal Road would be converted to US 50, and be expanded to a five-lane section in the California portion of the project site and a four-lane section in the Nevada portion of the project site. Existing US 50 would be reduced to a two-lane section with turn pockets from Park Avenue to its intersection with Lake Parkway and Lake Parkway, north of US 50, would remain unchanged. Existing US 50 from Pioneer Trail to Park Avenue would be left as a five-lane cross section. These configurations would lead to an improvement in local operations, but would not increase capacity outside of the immediate 0.2 mile segment of the highway. An increase in lane miles on this short segment would not be sufficient to influence trip generation or VMT. Additionally, as discussed under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS, TTD is coordinating a parking agreement to improve parking availability in the state line tourist core area that includes commitments to transit access, access to new public parking, and parking wayfinding signs as part of the project. Also, TTD has amended their short-range transit plan to include a transit circulator service in the tourist core near the state line. The transit circulator service would shorten walking distances between surrounding areas and amenities in the tourist core. These amenities would support increased use of multi-modal transportation. See Response to Comment 12-16 for a discussion of the effects of the project on transit ridership.

Van Sickle Bi-State Park currently only has one vehicular access point in the project site across from Heavenly Village Way. The project would create a signalized intersection at this entrance by installing a traffic signal that would provide vehicles entering and exiting Van Sickle Bi-State Park dedicated lanes and signal phases. Pedestrians would also have dedicated pedestrian crossing signal phases. The project would also construct a pedestrian bridge over new US 50 alignment, providing a direct connection between the tourist core and Van Sickle Bi-State Park. The pedestrian bridge would provide a safe crossing for pedestrians that would allow pedestrians to access the park without ever needing to cross a roadway at-grade.

12-11

The commenter suggests that the project may improve LOS in the short term, but that congestion would increase again in the long term. The commenter also states that California is moving toward focusing on VMT, instead of LOS, as the primary metric for identifying transportation-related environmental impacts.

The Draft EIR/EIS/EIS analyzes both VMT and LOS. As discussed on pages 3.6-88 and 3.6-89 (Tables 3.6-22 and 3.6-23) in Section 3.6.3 of the Draft EIR/EIS/EIS, study area facilities were analyzed under a long-term 2040 design year condition. Buildout of pending and approved projects are expected to be completed by 2040, as well as background growth in the region that is consistent with projections in the *Caltrans District 3 US 50 Transportation Concept Report and Corridor System Management Plan* (Caltrans 2014) and Table 18 of the 2017 IS/IEC (TRPA 2017a:3-52 – 3-53). The 2017 RTP/SCS accounted for buildout of the *South Shore Area Plan* and *Tourist Core Area Plan* (TRPA 2017b:2-12 – 2-13) as well as construction of active transportation and corridor revitalization projects (see Figure 3.6 in the 2017 RTP/SCS). The analysis in the Draft EIR/EIS/EIS showed that Alternatives B, D, and E would improve LOS within the project site through 2040.

California is currently in the process of defining guidelines for using VMT to evaluate transportation impacts of projects under CEQA, as mandated by Senate Bill 743 (2013). However, no formal CEQA guidelines had been issued as of the time of preparation of the Draft EIR/EIS/EIS nor have they been issues since then. Therefore, the Draft EIR/EIS/EIS has used the latest available NEPA, CEQA, TRPA, Caltrans, and NDOT guidelines and significance criteria available for evaluating transportation impacts of projects, as discussed on pages 3.6-15, 3.6-17, 3.6-26, and 3.6-30 of the Draft EIR/EIS/EIS. TRPA has a total VMT standard of reducing overall VMT within the Region to at least 10 percent below 1981 levels. Achievement of the VMT standard is addressed in the 2012 RTP/SCS and the 2017 RTP/SCS through a combination of transportation improvements and land use policies that incentivize redevelopment in urban center and mixes of urban uses that help reduce VMT. Master Response 1, “Adequacy of VMT Analysis,” addresses comments pertaining to the VMT analysis in the Draft EIR/EIS/EIS.

Caltrans, NDOT, and TRPA all currently have guidelines that define LOS thresholds for which all improvement projects shall comply. Relevant agency LOS thresholds are summarized in Section 3.6.3 of the Draft EIR/EIS/EIS, pages 3.6-15 and 3.6-17.

12-12

The commenter states that there are other ways to improve the safety and walkability of the tourist core area and that the substantial visitation rebound from the economic recession that has occurred over the past two years illustrates that the area is already competitive with other tourist destinations.

The commenter does not provide specific suggestions for safety and walkability improvements in the tourist core area and offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the

EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.

12-13 The commenter relates to the project objective to “create gateway and streetscape features that create a sense of place, align with compete streets principles, are reflective of Lake Tahoe’s natural setting, and provide effective way-finding,” and the commenter asserts there are other ways to achieve this objective. The comment does not provide specific suggestions for gateway or streetscape features, aesthetic treatments, wayfinding, or improvements that would implement complete street concepts. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives. Comments pertaining to the urban setting, tree removal, and other urban features are detailed later in the comment letter.

12-14 The comment pertains to the project objectives to “provide opportunity for redevelopment and revitalization with the project site,” “provide replacement housing for all residential units acquired for highway right-of-way purposes before groundbreaking for transportation improvements,” and “result in no net loss of housing in the South Shore area.” The commenter asserts that a bigger, wider road will not achieve project objectives and the project would not replace all housing for displaced residents. These comments are detailed later in the comment letter.

12-15 The commenter states that the project will increase transportation impacts and suggests that many of the conclusions regarding impacts discussed in the Draft EIR/EIS/EIS are based on inadequate technical analyses.

All transportation impacts were identified and discussed in the Draft EIR/EIS/EIS using industry standard methodologies and analysis, as well as traffic data that was validated to be consistent with existing conditions at the time of preparation of the Draft EIR/EIS/EIS (see Response to Comments 11-2 and 12-1). Section 3.6.4 of the Draft EIR/EIS/EIS identified and discussed mitigation measures for all significant impacts. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.

12-16 The commenter states that the project would expand capacity of the roadway in the study area by increasing vehicle speeds, extending the distance of the travel route along the realigned US 50, and adding more lanes to accommodate more vehicles (Lake Parkway and Stateline Avenue). The commenter also suggests that the increase in roadway capacity would be a deterrent to increased use of public transit.

As discussed in Section 3.6.3 of the Draft EIR/EIS/EIS, most of the action alternatives would result in higher average travel speeds on the realigned segment of US 50 relative to existing conditions. However, the posted speed limit on the realigned US 50 is anticipated to be 35 mph, matching that on existing US 50 today outside of the tourist core, thus limiting the maximum speed vehicles would be allowed to travel. The increased average travel speeds would only apply to the approximately 1.25-mile segment of realigned US 50, so interregional traffic on US 50 would see little travel time benefit overall because deficiencies and congestion on neighboring segments would remain. Most of the benefits of the increased average travel speeds on US 50 would be felt locally. Local transit services such as the TTD bus routes that operate within the project site would benefit from increased average travel speeds on mainline US 50 and decreased traffic volumes on old US 50 through the casino corridor, which would lead to improved route times and rider experience of local bus routes and encourage transit ridership. See also the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred



Action),” of this Final EIR/EIS/EIS regarding implementation of a transit circulator service in the tourist core near the state line.

None of the action alternatives would add capacity to Stateline Avenue. The only proposed improvement to Stateline Avenue would be extension of the existing southbound right-turn pocket at the intersection with US 50 via restriping. Under existing conditions, southbound Stateline Avenue approaching US 50 is wide enough to accommodate queued left-turn vehicles for approximately 250 feet without blocking the right-turn lane; therefore, the proposed restriping improvements would not affect capacity. As discussed under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS, the option to restripe Lake Parkway from three lanes to four has been dropped from further consideration.

An increase in length of the travel route along US 50 in the project site would lead to a slight increase in VMT (see Impacts 3.6-4 and 3.6-14 of the Draft EIR/EIS/EIS), but would not increase roadway capacity. The Highway Capacity Manual 2010 (Transportation Research Board 2010) defines roadway capacity as:

the maximum sustainable hourly flow rate at which persons or vehicles reasonably can be expected to traverse a point or a uniform section of a lane or roadway during a given time period under prevailing roadway, environmental, traffic, and control conditions.

Lengthening the roadway would have no effect on how many vehicles can travel through a certain point or segment of US 50 in the project site in a given time period.

As discussed in Impacts 3.6-6 and 3.6-16 in the Draft EIR/EIS/EIS, Alternatives B, C, D, and E would enhance existing transit infrastructure by constructing new bus shelters within the project site. These enhancements would encourage increased use of public transit. See also the discussion under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS regarding implementation of a transit circulator service in the tourist core near the state line.

12-17 The commenter suggests that the optional restriping of Lake Parkway (north of existing US 50) and Stateline Avenue would increase vehicle use and that it is unclear whether these increases were incorporated into the transportation analysis. As described under “Project Refinements to Alternative B,” in Chapter 2, “Preferred Alternative and Project Refinements,” of this Final EIR/EIS/EIS, the option to restripe Lake Parkway on the lake side between Stateline Avenue and US 50 as a four-lane roadway is no longer being considered. With implementation of Alternative B, this segment of Lake Parkway would remain a three-lane roadway (one travel lane in each direction with a dedicated left-turn lane). Because this option has been dropped, there is no need to reiterate the locations in the Draft EIR/EIS/EIS where it was analyzed.

12-18 The commenter suggests that the traffic analysis in the Draft EIR/EIS/EIS is inadequate since it does not address the increased trips that would be induced by the project.

According to a policy brief entitled *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion* (National Center for Sustainable Transportation 2015), “An increase in VMT attributable to increases in roadway capacity where congestion is present is called ‘induced travel’.” The increases in capacity the policy brief refer to are listed as generally consisting of improvements, such as adding additional lanes to existing roadways. The policy brief also summarizes that capacity expansion leads to a net increase in VMT.

Alternatives A, C, and E would not result in a net increase in number of roadway lanes in the project site. Depending on the roadway segment, Alternatives B and D would result in either no increase, a localized decrease, or a small, local increase in number of roadway lanes. As described in Response to Comment 12-10, this small, local increase in number of lanes would occur over a roadway segment that is approximately 0.2 miles long (existing US 50). This potentially widened roadway segment would primarily only be utilized by traffic going to or from the land uses located directly adjacent to the segment, for example, the Heavenly Village Center Shopping Center adjacent to existing US 50. See Response to Comments 12-10 and 12-17. Since all action alternatives would lead to either no increase in number of roadway lanes or a small, local increase in number of roadway lanes in the project site, the project would induce either no or a minor amount of demand, which was accounted for under the background growth that was assumed consistent with the 2017 RTP/SCS.

According to the Federal Highway Administration (FHWA), the term “induced travel” (FHWA 2017):

[I]s often misused to imply that increases in highway capacity are directly responsible for increases in traffic. In fact, the relationship between increases in highway capacity and traffic is very complex, involving various travel behavior responses, residential and business location decisions, and changes in regional population and economic growth. While some of these responses do represent new trips, much of the observed increase in traffic comes from trips that were already being made before the increase in highway capacity, or reflect predictable traveler behavior that is accounted for in travel demand forecasts.

The FHWA also states that using a single demand elasticity to directly link a percentage increase in roadway capacity to a percentage increase in travel is highly unreliable.

Based on the above definition of induced travel, any estimate of growth in traffic in the study area would need to incorporate the effects of population and economic growth, planned roadway improvements, travel behaviors and choices, etc. All of these factors were considered during the development of the approved 2017 RTP/SCS. All forecasts in the Draft EIR/EIS/EIS are consistent with study area forecasts found in Table 18 of the 2017 IS/IEC (TRPA 2017a:3-52 – 3-53). Therefore, demand induced by the project was accounted for in the future year forecasts used in the Draft EIR/EIS/EIS.

12-19      The commenter suggests that the project would induce trips and generate more travel, and that the Draft EIR/EIS/EIS conclusion that long-term traffic flow would be improved in the area does not account for the idea that reduction in congestion is temporary due to induced travel.

The project would induce either no or a minor amount of demand, which was accounted for under the background growth that was assumed consistent with the 2017 RTP/SCS. The demand induced by the project is accounted for in the long-term 2040 forecasts used in the Draft EIR/EIS/EIS (see Response to Comment 12-18). The analysis in the Draft EIR/EIS/EIS showed that Alternatives B, D, and E would result in improved LOS within the project site under long-term 2040 conditions. See Response to Comment 12-11.

12-20      The commenter suggests that since the Draft EIR/EIS/EIS claims the project is not projected to induce travel, there would be no increase in traffic between existing conditions and 2040 due to limited roadway capacity; therefore, there would be no need for the project to reduce vehicle delays. The existing traffic operations shown in Table 3.6-2 of the Draft EIR/EIS/EIS should be consistent with the 2040 No Build alternative operations shown in Table 3.6-22, but they are not.

According to pages 2-12 and 2-13 of the 2017 RTP/SCS, land use growth in the study area, which is connected to growth in transportation, is controlled by several factors, including buildout of the *South Shore Area Plan* and *Tourist Core Area Plan*. The *South Shore Area Plan* and *Tourist Core Area Plan* also set limits on the maximum growth that can occur in the Stateline region. Also, according to page 2-16 of the 2017 RTP/SCS:

Although growth is capped and development metered within the Tahoe Region, population growth is occurring outside the regional boundaries. Forecasts of four million people or more in Northern California and Northern Nevada over the next 20 years are likely to increase the currently estimated 10 million vehicles entering the Tahoe Region annually.

The increase in traffic projected for the No Build alternative between existing conditions and 2040 conditions in the Draft EIR/EIS/EIS, which includes 0.5 percent per year background growth and traffic from approved and pending projects, is consistent with forecasts contained in Table 18 of the 2017 IS/IEC (TRPA 2017a:3-52 – 3-53).

12-21

The commenter asserts that if the project would not increase visitor traffic to the area, then the project would not increase visitation by 20 percent or result in an increase in retail sales. The commenter also questions why the project should be constructed if it would result in removal of trees, increases in pavement and stormwater runoff, scenic effects, noise, and displacement of residents and businesses.

To clarify, the Draft EIR/EIS/EIS does not claim that the project would result in a 20 percent increase in visitation. The commenter obtained this statistic from the *Economic Analysis of the US 50/South Shore Community Revitalization Project* (TTD 2013), which was used to support analysis of the economic effects of the project in Section 4.6, “Economic Effects” (pages 4-10 – 4-23 in the Draft EIR/EIS/EIS).

The comment misinterprets the capability of the project to result in a 20 percent increase in visitation discussed in the Economic Study. The actual potential of the project to result in an increase in visitation is tied to implementation of best practices, some of which are outside the scope of the project as stated on page 49 of the Economic Study:

The Project can be used as a means to facilitate the provision of these [best practices] through both direct and indirect means. If these initiatives can be successfully implemented by way of the Project, the positive impact on the South Shore economy would be substantial. While it is very difficult to predict the magnitude of this effect, EPS believes that a 20 percent increase in visitation could reasonably be expected to be achieved.

As stated in the Economic Study and on page 4-12 of the Draft EIR/EIS/EIS, economic benefits and increase in visitation to the tourist core area would be influenced by improvements related to those provided by the project, such as enhanced transit, affordable housing, maintaining a sense of place, and enhanced walkability. However, the economic benefits and increased visitation could be fully achieved by implementing best practices that extend beyond the scope of the project and have been demonstrated through the successful redevelopment of other tourism-oriented mountain/resort communities, including (TTD 2013:26, 47–48):

- ▲ comprehensive redevelopment efforts to raise the aesthetic appeal and allow visitors to experience new and compelling attractions;
- ▲ provide a more complete roster of visitor amenities;

- ▲ offer a variety of upscale accommodations, fine dining, shopping, and other attractions;
- ▲ enhance four-season appeal; and
- ▲ provide events and programs that cater to a wide range of visitors and local residents.

Full implementation of the TCAP and SSAP, along with the project, could incorporate these best practices to help achieve the full economic benefits and increase in visitation that is described in the Economic Study.

The project would help enable an increase in visitation and increase in retail sales because it supports the goals and policies of the TCAP and SSAP. The TCAP and SSAP provide frameworks for improvement and enhancement of the built environment as well as for providing redevelopment and revitalization in the tourist core. As described under Impact 3.2-1 in Section 3.2, "Land Use," the project is consistent with the goals and policies of the TCAP and SSAP. The plans for Town Centers, such as the TCAP and SSAP within the study area, are intended to facilitate development and implement components of those plans, including roadway improvements, transit improvements, and improvements that support bicycling and walking, such as complete streets that allow for multiple uses including automobiles, bikes, and pedestrians. The transportation improvements proposed by Alternatives B, C, and D are recognized as planned improvements in the RTP/SCS, TCAP, SSAP, and ATP (page 3.2-15 of the Draft EIR/EIS/EIS). As stated on page 3.2-16 of the Draft EIR/EIS/EIS:

Alternative B would narrow existing US 50 through the tourist core, creating a low speed street, and would enhance pedestrian, bicycle, and transit access and facilities in this area. These are some of the features of Alternative B that would help achieve goals, policies, and actions included in the Regional Plan, TCAP, AND SSAP that encourage redevelopment, development of alternative modes of transportation, and creating a seamless connection between California and Nevada and a seamless pedestrian street environment (City of South Lake Tahoe and TRPA 2013:5-1, 5-2, 6-1, 6-2; Douglas County and TRPA 2013:75, 76; Tahoe Metropolitan Planning Organization [TMPO] and TRPA 2012a:3-2, 3-4, 3-6).

The commenter's assertions related to approval of the project in the face of potential adverse environmental effects do not provide any specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided. The comment is noted for consideration during project review.

12-22

The commenter suggests recent transportation information concludes that increasing capacity leads to more traffic, which shows the project will increase traffic.

Since all action alternatives would lead to either no increase in net roadway lanes or a small, local increase in net roadway lanes in the project site (see Response to Comment 12-10), the project would induce an incremental increase in demand. The demand induced by the project is accounted for in the long-term 2040 forecasts used in the Draft EIR/EIS/EIS. See Response to Comment 12-18.

12-23

The commenter states that the Draft EIR/EIS/EIS does not consider the project's impact on other roadways within the region and that the 0.5 percent per year growth rate assumed in the Draft EIR/EIS/EIS is too low.

Inter-regional roadways are outside of the study area and are not required to be analyzed for NEPA, CEQA, or TRPA. Analysis of major interregional roads in the Tahoe Basin area was included in Table 18 of the 2017 IS/IEC (TRPA 2017a:3-52 – 3-53).

According to pages 2-12 and 2-13 of the 2017 RTP/SCS, land use growth in the TRPA region, and therefore the study area, is controlled by several factors, including the *South Shore Area Plan* and *Tourist Core Area Plan*. The growth projected in the Draft EIR/EIS/EIS, which includes 0.5 percent per year background traffic volume growth and traffic from approved and pending projects, is consistent with forecasts contained in Table 18 of the 2017 IS/IEC. In addition, the 0.5 percent per year growth rate assumed in the Draft EIR/EIS/EIS is a long-term average. Growth during individual years may vary significantly, as shown in the recent traffic trends in Table 3.6-1 of the Draft EIR/EIS/EIS. However, overall growth averages out to approximately 0.5 percent per year between the existing conditions and design year 2040 assuming full build out of the *South Shore Area Plan* and *Tourist Core Area Plan*. See Response to Comment 12-21 regarding the alleged 20 percent increase in visitation resulting from the project.

12-24

The commenter asserts that the project would be growth-inducing because it fosters population growth and economic growth and removes barriers to growth (i.e., improves LOS conditions). The commenter also asserts that the project would expand the existing transportation network.

The commenter is correct that the project could result in additional housing units, economic benefits, and improved LOS standards. The project would not result in induced growth that was not planned and accounted for in the Regional Plan. As described in Response to Comment 12-21, the economic benefits associated with the project are tied to redevelopment in the tourist core that could occur with implementation of the TCAP and SSAP. On page 4-5, the Draft EIR/EIS/EIS states:

Development in the Tahoe Region is guided by the Regional Plan, which allows new development and redevelopment through authorization of residential allocations, commercial floor area, tourist accommodation units, and residential bonus units. As a result, development is capped in the Region and implementation of capital improvement projects, such as the US 50/South Shore Community Revitalization Project would not result in an increase in the planned development patterns in the Region.

The commenter refers to the requirements of Section 50.4.3 of the TRPA Code for mandatory LOS standards that must be met and maintained before commodity allocations for individual jurisdictions are released. The commenter is incorrect in asserting that the improvement of LOS conditions would be growth-inducing because meeting those conditions would result in the release of additional commodities. Table 50.4.1-1 in Section 50.4.1 of the TRPA Code identifies the maximum amount of residential allocations, commercial floor area, and tourist units that can be allocated in the Region as a whole and breaks out how much of the total allocations can be distributed between the jurisdictions. The LOS standard is a condition that jurisdictions must meet to receive their share of the total allocations.

The Draft EIR/EIS/EIS also addresses the potential growth-inducing effects related to the mixed-use development on page 4-5:

Alternatives B, C, and D with mixed-use development would result in localized growth of residential and commercial uses that is planned for in the Regional Plan. This development would be subject to the commodities system set forth by the Regional Plan that distributes a limited number of residential and commercial floor area (CFA) allocations.

The commenter's assertion that the project would result in an increase in growth beyond the Regional Plan's assumed growth rates because TRPA does not currently limit the conversion of single-family homes to vacation rentals, is invalid. While it is true that single-family homes

in the Tahoe Basin can be used as vacation rentals, those homes are either used by full-time residents or they are used for vacation rentals. In either case, the number of single-family homes is still capped by the Regional Plan. As described in Section 2.3.1, “Replacement Housing,” on page 2-5 of the Draft EIR/EIS/EIS, “All of the replacement housing would be deed-restricted such that the housing units must be used for full-time residents and may not be used as second homes or for vacation rental use.”

The traffic volume growth rate of 0.5 percent per year is consistent with forecasts contained in the 2017 RTP/SCS IS/IEC and represents a long-term average of traffic trends. See Response to Comment 12-23.

All project alternatives would result in either no increase or a minor increase in number of roadway lanes in the project site, depending on certain project options. See Response to Comment 12-10.

For the reasons described herein and discussed in Draft EIR/EIS/EIS Section 4.3, “Growth-Inducing Impacts,” the project would not induce growth beyond that planned for in the Regional Plan.

12-25 The commenter states that the transportation analysis applies a 10 percent trip reduction to all cumulative developments in the area, but does not provide evidence to justify this reduction. The commenter also suggests it is not appropriate to apply a reduction to some of these cumulative developments because they are not located immediately within the study area or near other amenities.

According to Figures 1.5 and 1.6 in the 2017 RTP/SCS, transit and non-motorized travel methods make up approximately 17 percent of all trips in the Tahoe region, including trips by residents, commuters, and visitors for both recreational and typical daily activities. Assuming approximately 10 percent of trips generated by future developments would be transit/bike/pedestrian is a reasonably conservative estimate consistent with current mode choice data within the region.

Based on a review of available information for approved and pending projects as well as aerial imagery, all of the approved and pending projects included in the Draft EIR/EIS/EIS would be located within approximately 0.5 mile of a bus stop. Existing pedestrian and bicycle facilities adjacent to the approved and pending projects vary. Some existing pedestrian and bicycle facilities are within the vicinity of the approved and pending projects, but most facilities are not continuous. The 2017 RTP/SCS proposes to increase transit service in the South Shore area, including increased frequency of bus routes and improved transit stops and facilities. The project would construct new transit stops, bicycle and pedestrian improvements, and a transit circulator service in the tourist core (see the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action)”) that would provide better network connectivity within the project site and study area.

12-26 The commenter states that growth rates in the RTP analyses are no longer applicable due to recent increases in traffic and that the EIR/EIS/EIS must resolve this deficiency. See Response to Comments 12-20, 12-23, and 12-24 regarding growth rates.

12-27 The commenter states that the 2012 RTP/SCE EIR/EIS did not analyze the impacts of the proposed project. The commenter further states that there was no analysis of the vehicle trips, VMT, or LOS impacts of the proposed project included in the 2012 environmental documents. See Master Response 1, “Adequacy of VMT Analysis.”

- 12-28 The commenter provides an example of how to estimate VMT and asserts that the EIR/EIS/EIS needs to analyze and disclose the increase in the total VMT associated with the proposed project. See Master Response 1, “Adequacy of VMT Analysis.”
- 12-29 The commenter contends that the EIR/EIS/EIS should disclose the local VMT and daily vehicle trip ends (DVTEs) for El Dorado County and/or the City of South Lake Tahoe and Douglas County as was done for the 2015 Threshold Evaluation Report. Table 12-15 referenced in this comment summarizes VMT and DVTE over a 5-year period based on Caltrans and NDOT traffic count data, not a projection. The data shows the variability of these traffic metrics and demonstrates an overall decrease in DVTE and VMT over the period. See Master Response 1, “Adequacy of VMT Analysis,” regarding the commenter’s request for a localized analysis.
- 12-30 The commenter states that the project’s Economic Assessment concluded the project would lead to a potential 20 percent overall increase in vehicles to the area and the Draft EIR/EIS/EIS dismisses this increase in visitors. The commenter asserts that either the economic benefits of the project have been overstated or the traffic impacts understated. See Response to Comment 12-21.
- 12-31 The commenter suggests that the Draft EIR/EIS/EIS traffic analysis should use 2015 traffic counts and account for recent growth rates and trends into the post-2014 analyses (e.g., for 2020 and 2040).
- Regarding use of 2014 traffic counts, see Response to Comment 11-2. An annual growth rate of 0.5 percent was used for post-2014 analysis. See Response to Comment 12-23.
- 12-32 The commenter states that the Draft EIR/EIS/EIS must reflect recent increases in traffic through the use of an updated baseline year or adjustments to the growth rate used in the analysis. The commenter also states that the Draft EIR/EIS/EIS needs to identify which locations found in Table 5 of Appendix I have been counted once every 3 years (see also Table 5 in Appendix B of this Final EIR/EIS/EIS). The footnote in Table 5 of Appendix I of the Draft EIR/EIS/EIS stating the following, “At certain locations, Caltrans and NDOT counts may have been actually conducted only once in every three years,” has been removed as it was originally included in error, which is reflected in Appendix B of this Final EIR/EIS/EIS.
- Year-to-year differences in annual average daily traffic (AADT) are not a good indicator of overall long-term AADT trends as AADT can fluctuate significantly from year to year. Any years for which Caltrans or NDOT count book volumes are adjusted or estimated may still be considered accurate in the context of long-term (20-year) traffic trends. Additionally, Caltrans Performance Measurement System data for locations found in Table 5 of Appendix I of the Draft EIR/EIS/EIS and Appendix B of this Final EIR/EIS/EIS have been used to verify the trends shown in Table 5.
- Regarding use of 2014 traffic counts, see Response to Comment 11-2. An annual growth rate of 0.5 percent was used for post 2014 analysis. See Response to Comment 12-23.
- 12-33 The commenter suggests that the Draft EIR/EIS/EIS must re-evaluate the annual growth rate used in the transportation analysis and apply a different growth rate to future year impact analyses. The commenter notes that a growth in traffic of 2 to 12 percent occurred from 2014 to 2015.
- Year-to-year differences in AADT can fluctuate significantly and are not a good indicator of overall long-term AADT trends (see Response to Comment 12-32). Regarding use of a 0.5 percent growth rate for future year analyses, see Response to Comment 12-23.



- 12-34 The commenter states that the Draft EIR/EIS/EIS should reflect the best available transportation planning information and evaluate alternative options to reduce vehicle use and accommodate emergency responders and operations without expanding roadway capacity.
- The use of LOS as a means of qualitatively assessing traffic operating conditions is a widely used industry standard (see Response to Comment 12-11). The project proposes to increase roadway capacity in the project site by a minor amount, if at all, depending on project options (see Response to Comment 12-16). As shown in Table 2-5 of the Draft EIR/EIS/EIS, throughout the history of the project, 20 alternatives have been studied to produce the alternatives that best address the project's purposes, need, and project objectives.
- See also Response to Comment 12-10 regarding roadway capacity.
- 12-35 The commenter states that the Draft EIR/EIS/EIS should evaluate local LOS impacts that would result from any foreseeable developments in the study area, as well as potential impacts to intersections between the Y (SR 89/US 50 intersection) and the state line.
- Impact 3.6-12 in the Draft EIR/EIS/EIS evaluates LOS impacts under conditions with buildout of all approved and pending projects within or near the study area, as well as construction of the mixed-use developments proposed as part of the project, at study area intersections and roadways. The study area facilities were chosen based on discussion with TRPA, Caltrans, and NDOT staff. Any foreseeable developments not approved or pending in the project site would be required to be consistent with the *South Shore Area Plan* (SSAP) and *Tourist Core Area Plan* (TCAP). Assessment of traffic generated by future development that would not be consistent with the SSAP and TCAP would be speculative. Traffic generated from these projects has been accounted for in the 2017 IS/IEC.
- 12-36 The commenter asserts that the project does little to improve transit and it should include improved transit as a priority issue and mechanisms to generate additional funding needed to implement future transit. See Master Response 11-1 and the discussion under the header "Project Refinements to Alternative B," in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS for details on transit elements incorporated into the project.
- 12-37 The commenter states that the EIR/EIS/EIS needs to evaluate the increase in DVTEs from the project, including those due to induced travel and a net increase in housing units and commercial floor area.
- Because all project alternatives would lead to either no increase in net roadway lanes or a small, local increase in net roadway lanes in the project site (see Response to Comment 12-10), the project would induce a less-than-significant amount of demand. The demand induced by the project is accounted for in the long-term 2040 forecasts used in the Draft EIR/EIS/EIS. See Response to Comment 12-18. Response to Comment 12-21 addresses the commenter's concerns about the alleged 20 percent increase in visitation associated with the project.
- Impact 3.6-20 of the Draft EIR/EIS/EIS shows that Alternatives B, C, and D would generate more than 200 new daily vehicle trip ends with implementation of the proposed mixed-use development, which would be a significant impact. Implementation of Mitigation Measure 3.6-20 of the Draft EIR/EIS/EIS would reduce the impact to less than significant.
- 12-38 The commenter acknowledges that the project does not create new vacation rentals or contribute to the conversion of single-family homes to vacation rentals, but states that the traffic associated with vacation rentals should be incorporated into the cumulative impact analysis.
- As stated in Draft EIR/EIS/EIS page 3.6-23, industry standard Institute of Transportation Engineers *ITE Trip Generation Manual*, 9<sup>th</sup> Edition trip generation rates were used to develop

Year 2040 volumes forecasts. As outlined in *ITE Trip Generation Manual, 9<sup>th</sup> Edition*, daily and peak hour trip generation rates for Single-Family Detached Housing (Land Use 210) (i.e., permanent residences) are approximately three to four times higher than Recreational Homes (Land Use 260) (i.e., vacation homes) daily and peak hour trip generation rates. Therefore, the Draft EIR/EIS/EIS assumption that the existing single-family housing in the area would retain its original land use offers a more conservative cumulative condition forecast. Additionally, the future growth assumed in the Draft EIR/EIS/EIS is consistent with land use growth in the TRPA region as outlined in 2017 RTP/SCS, which assumes implementation of the *South Shore Area Plan* and *Tourist Core Area Plan*.

- 12-39 The commenter states that the cumulative impact analysis in the Draft EIR/EIS/EIS needs to consider the potential localized impact of traffic from the Edgewood Mountain Recreation Resort District (RDD).

Neither TRPA nor Douglas County consider the RDD an approved or pending project. Projects that are not currently approved or pending are not directly assumed in the future scenarios of the Draft EIR/EIS/EIS. As stated in pages 2-12 and 2-13 of the 2017 RTP/SCS, cumulative growth in the area is dictated by various programs, such as the *South Shore Area Plan*. Any future developments in the Tahoe region, such as the RDD, must conform to these Area Plan requirements. The cumulative growth projected in the Draft EIR/EIS/EIS, which includes build out of the *South Shore Area Plan*, is consistent with forecasts contained in Table 18 of the 2017 IS/IEC (TRPA 2017a:3-52 – 3-53).

- 12-40 The commenter notes that it is unclear whether traffic generated by the implementation of the 2005 Van Sickle Bi-State Park (VSBSP) Master Plan has been incorporated into the Draft EIR/EIS/EIS cumulative analysis.

The Van Sickle Bi-State Park Master Plan (Master Plan) is not yet an adopted plan. The IS/ND/Expanded IEC prepared for the Master Plan found that implementation of Phase I of the Master Plan would generate a total of 183 DVTE and 28 one-way peak hour vehicle trips (11 inbound and 17 outbound; Conservancy 2009:260 – 261). Van Sickle Bi-State Park is located immediately adjacent to the largest bed base in the Tahoe Basin, which allows for a short walk or bicycle ride to the park for visitors in the tourist core area. Additionally, the project proposes an additional pedestrian access point to the park with the proposed pedestrian overcrossing near the Harrah's entrance. The Traffic and Air Quality Mitigation Program in the TRPA Code of Ordinances defines an increase of more than 100 but not more than 200 daily vehicle trips as a minor increase in traffic, which would not require preparation of a traffic study (see Section 65.2.2(e) of the TRPA Code). The relatively small increase in traffic generated by buildout of Phase I of the Master Plan would be accounted for in the 0.5 percent increase in background growth in traffic considered in the traffic analysis in the EIR/EIS/EIS. See Response to Comment 11-2 for additional discussion of the assumptions used in the traffic analysis related to background growth and other planned projects.

- 12-41 The commenter states that the access road for the Gondola Vista project and its associated impacts are not reflected in the Draft EIR/EIS/EIS. See the discussion under the header "Project Refinements to Alternative B" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS.

- 12-42 The comment pertains to the project objective to "improve visual and environmental conditions within the tourist core." The commenter asserts that the visual improvements appear to focus on the existing urban environmental along US 50, and improvements would be completed at the expense of the adjacent, less developed natural areas along the proposed realigned US 50 route. The commenter suggests that this objective can be met without realigning the highway. The comment focuses on a single objective, neglecting consideration of the overarching

purpose and need for the project of which scenic quality improvements are only one element. The comment is noted for consideration by decision makers.

12-43

The commenter asserts that the visual impact conclusions are flawed, because the negative impacts to the natural areas east and northeast of existing Lake Parkway and Montreal Road, including Van Sickle Bi-State Park, are not adequately addressed. The commenter also notes a decrease in visual quality associated with the limited viewpoints that were analyzed for these areas.

Exhibit 3.7-4 of the Draft EIR/EIS/EIS shows the location of illustration viewpoints considered in the analysis. Five before-and-after illustrations were prepared to consider the impacts of the realigned highway on Montreal Road, Lake Parkway, and Van Sickle Bi-State Park. Three illustrations were prepared to consider the impacts along the new main street through the tourist core. The impacts on the scenic quality and visual character of Lake Parkway and Montreal Road is discussed on page 3.7-28. The analysis concludes that implementation of the proposed project (Alternative B) “would have minor effects on scenic quality and visual character in this part of the project.” Many context-sensitive design treatments have been included in the project design to address potential impacts in these natural areas. These are described in Section 2.3.2, “Pedestrian Bridge over Realigned US 50,” and Section 5.3.1, “Section 4(f) Consultation,” of the Draft EIR/EIS/EIS. Illustrations of these features are included in Appendix D, “Resources Evaluated Relative to the Requirements of Section 4(f) and Proposed *de Minimis* Determination,” in the Draft EIR/EIS/EIS and Appendix C of this Final EIR/EIS/EIS. The commenters assertion that the analysis is flawed is unfounded.

12-44

The commenter suggests that there are far more viewpoints selected for analysis in the urban areas than the natural areas where emphasis should be placed. The comment includes an excerpt with Figure 7 from the Visual Impact Assessment (VIA) included in Appendix G of the Draft EIR/EIS/EIS, with circled viewpoints that should be included.

It appears that the author of the comment did not consider the additional visual illustrations prepared for the Draft EIR/EIS/EIS and included in Section 3.7, “Visual Resources/Aesthetics.” As noted in Response to Comment 12-43, more illustrations were prepared to analyze impacts along Montreal Road and Lake Parkway, than the new main street through the tourist core. The reasonable viewpoints that are requested are already included in Section 3.7 and those included in Appendix D, nearly all of the requested images were already included in the Draft EIR/EIS/EIS analysis.

It is not necessary to analyze impacts from locations within Heavenly Village as the realigned highway would not be visible from these locations because of intervening structures (the three-story Marriot buildings, four-story parking structure, and two-story Forest Suites Inn buildings) and trees.

It is not necessary to illustrate views from existing Lake Parkway driving east around the turn near Montbleu where one first sees views across Lake Tahoe, because the highway improvements in this area would not block existing views of the lake. It would more likely enhance views of the lake by extending the roadway alignment to the east.

12-45

The commenter asserts that improvements in the visual quality rating of urbanized areas would be completed at the expense of the visual quality of natural areas, and TRPA should focus on alternative means to improve the urban areas that do not degrade natural areas. The commenter asserts that Viewpoints 2, 7, and 8 are located in natural areas along Lake Parkway and states that the VIA concluded a negative impact to visual quality of these viewpoints. Finally, the commenter asserts that the EIR/EIS/EIS should evaluate Lake Parkway as a potential future TRPA roadway travel unit with potential future scenic resources that could be designated as such in the next threshold assessment.

Chapter 90 of the TRPA Code defines “urban areas” as those areas designated as residential, tourist, commercial/public service, or mixed-use by the applicable plan area statement (PAS), community plan, or area plan. The project site is located within one of the most densely developed areas in the Tahoe Basin. Most areas within the project site in California within the TCAP, including Lake Parkway, are designated Tourist and located either within a Town Center or Regional Center Overlay area (City of South Lake Tahoe and TRPA 2013: Figure 2-1). The only portion of the project site in California not within the TCAP includes the Rocky Point neighborhood, which is designated as residential in applicable PASs. Portions of the project site within Nevada are located entirely within the SSAP on lands primarily designated as Tourist, with land northeast of Lake Parkway designated as Resort Recreation (Douglas County and TRPA 2013). Therefore, the project site is located in an urban area.

The Draft EIR/EIS/EIS discusses the effect the realignment alternatives would have on the scenic quality and visual character of Lake Parkway in Impact 3.7-1 (pages 3.7-28, 3.7-34, and 3.7-48) and concludes these alternatives would have a minor effect on scenic quality and visual character after implementation of various design elements and context-sensitive aesthetic treatments developed in consultation with the Van Sickle Bi-State Park managers. The context-sensitive treatments were developed subsequent to completion of the VIA and are shown in Exhibits 3.7-7, 3.7-8, 3.7-9, and Appendix D of the Draft EIR/EIS/EIS. It is beyond the scope of the EIR/EIS/EIS to evaluate yet-to-be-established TRPA scenic travel routes and scenic resources beyond the analysis that has already been included in the Draft EIR/EIS/EIS. The comment is noted for consideration by decision makers.

- 12-46 The commenter states that with design modifications that would convert the pedestrian skywalk associated with Alternative E to a narrower walkway would reduce its visual mass. The commenter inquires about what project objectives would not be met with a narrower walkway and where events that would otherwise close the street down could be held. See Response to Comment 66-2.
- 12-47 The commenter contends that impacts of all manmade structures on viewsheds have not been adequately considered, and excerpts Draft EIR/EIS/EIS text stating that traffic signals and light standards do not have sufficient mass to substantially disrupt scenic views. The comment requests clarification on how these vertical components have been accounted for in the simulations and viewpoints along Lake Parkway and within Van Sickle Bi-State Park. Visual illustrations contained in the Draft EIR/EIS/EIS show the vertical features referred to in this comment. Exhibits 3.7-7 and 3.7-9 show proposed street lighting along realigned US 50 on the lake side of the roadway and sidewalk. Exhibits 3.7-8 and 3.7-9 show proposed traffic signals along realigned US 50 at the main entrance to Van Sickle Bi-State Park and at the Harrah’s driveway. Exhibit 3.7-15 shows proposed street lighting along existing US 50 between Lake Parkway and SR 207. Exhibits 4 and 5a in Appendix D of the Draft EIR/EIS/EIS also show proposed street lighting and traffic signals along realigned US 50. See Response to Comment 12-61 regarding viewpoints from within Van Sickle Bi-State Park.
- 12-48 The commenter states that the proposed mixed-use sites are located in areas where heights of up to 95 feet are allowed in the TCAP. The commenter further states that the Draft EIR/EIS/EIS dismisses the responsibility for evaluating the potential visual impacts of the proposed mixed-use sites and that the potential height and bulk of three new tall structures would impact the scenic views from highways, pedestrian paths, bike paths, and recreation areas. The commenter notes that the Draft EIR/EIS/EIS does not include analysis or simulated images to assess the potential scenic impacts associated with the proposed mixed-use sites.

For Alternative B, Site 1 is within the Tourist Center Mixed-Use (TSC-MU) zoning district, which allows a height of up to 56 feet and buildings of up to four stories. Site 2 is partially within the Tourist Center Neighborhood Mixed-Use (TSC-NMX) and Open Space (OS) zoning districts and partially within PAS 092 (Pioneer/Ski Run). The TSC-NMX zoning district allows a height

of up to 36 feet and buildings of up to three stories. PAS 092 allows heights of up to 42 feet (Section 37.4 of the TRPA Code), but does not specify a limit on number of stories. Site 3 is within the Tourist Center (TSC-C) zoning district, which allows heights of up to 95 feet and buildings of up to six stories. (City of South Lake and TRPA 2013: Figure 5-1 and Table 7) The Draft EIR/EIS/EIS considers a conceptual plan for potential development of the three mixed-use sites with buildings of up to three stories on each of the sites (see discussion under the header “Mixed-Use Development Sites” beginning on page 2-25 of the Draft EIR/EIS/EIS).

The potential for the mixed-use development to affect scenic resources is discussed in Section 3.7, “Visual Resources/Aesthetics,” of the Draft EIR/EIS/EIS. The Draft EIR/EIS/EIS programmatically evaluates the potential for the mixed-use development sites to degrade scenic quality and visual character (beginning on page 3.7-29), interfere with or disrupt scenic vistas or scenic resources (beginning on page 3.7-43), and increase light and glare (beginning on page 3.7-46). The analysis also describes that the mixed-used development sites would have to undergo subsequent project-level environmental review once they are defined and submitted for permitting.

As described in the Draft EIR/EIS/EIS, the mixed-use development sites would be required to avoid impacts on scenic vistas and scenic resources through building design and orientation consistent with TRPA Code. Similarly, the mixed-use development sites would need to comply with all applicable design standards and guidelines, including height standards, and would need to be oriented and designed in a ways that avoid impacts to TRPA scenic threshold ratings for travel routes and scenic resources. Further, because the proposed three-story buildings would be intermixed with other one to three stories buildings in the immediate surrounding area, the proposed mixed-use development sites would not be substantially more bulky or taller than surrounding buildings and would not substantially alter the visual character of the area. Conceptual illustrations of the mixed-use development sites prepared in support of the project are included below. For the reasons described above, the mixed-use development sites would not impact the scenic view from highways, pedestrian paths, bike paths, and recreation areas as suggested by the commenter. Therefore, further analysis is not necessary.



Source: Design Workshop 2015

**Alternative B: Conceptual view looking north from the proposed New US 50/Pioneer Trail/Old US 50 intersection toward potential mixed-use development Sites 1 and 2.**





Source: Design Workshop 2015

**Alternative B: Conceptual view from the Linear Park looking toward the tourist core from a point behind mixed-use development Site 1.**



Source: Design Workshop 2015

**Alternative D: Conceptual view looking toward the proposed New US 50/Pioneer Trail/Old US 50 intersection and mixed-use development Sites 1 and 2.**

12-49

The commenter states that the same comments regarding the project-specific impact analysis apply to the cumulative impact assessment and that the EIR/EIS/EIS needs to address these flaws, including the impacts of the Gondola Vista Project.

This comment is general in nature. The Gondola Vista Project is listed in the cumulative project list in Table 3.19-2 of the Draft EIR/EIS/EIS and considered in the impact analysis in Section 3.19, "Cumulative Impacts." A discussion of cumulative impacts related to visual resources/aesthetics begins on page 3.19-24. See also the discussion under the header "Project Refinements to Alternative B" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)" of this Final EIR/EIS/EIS.

- 12-50 The commenter asserts that the EIR/EIS/EIS needs to discuss the impact of vehicle headlights on realigned US 50 on adjacent natural and recreational areas, including potential future campers and trail users within Van Sickle Bi-State Park.
- The potential for the realignment alternatives to increase light and glare, including light related to headlights of vehicles, is discussed in Impact 3.7-3 of the Draft EIR/EIS/EIS. Potential future camping and trail locations are shown on conceptual drawings in the Van Sickle B-State Park Master Plan (Conservancy 2009), which was never adopted. Headlights of vehicles on realigned US 50 would not result in significant light and glare impacts on park users because existing and planned camping and trail use areas would be setback and topographically separated from the realigned highway and would be screened from the highway by intervening stands of trees and existing Gondola Vista residential structures (currently under construction). Van Sickle Bi-State Park is in close proximity to the tourist core and urban development; thus, expectations about light and noise at this park would be different than if it were located in a more remote location. Therefore, further analysis is not necessary.
- 12-51 The commenter describes that the Draft EIR/EIS/EIS identifies a potentially significant impact of headlights to the residents in the Rocky Point neighborhood that can be mitigated with construction of the 6 to 8-foot sound barriers identified in Mitigation Measures 3.15-3. The commenter states that FHWA will not pay for installation of this barrier and there are no guarantees it would be installed and asserts that the impact conclusion should be significant and unavoidable.
- See Response to Comment 12-74 regarding funding for the sound barriers.
- As described on page 3.15-66 of the Draft EIR/EIS/EIS, sound barriers and/or rubberized hot mix-asphalt (RHMA) applied on top of the roadway would be necessary to reduce noise to a level below the applicable TRPA land use-based noise thresholds. Because sound barriers are more effective than RHMA and the Draft EIR/EIS/EIS did not find any significant and unavoidable impacts related to their implementation, TTD has committed to constructing noise attenuation features including sound walls where needed, earthen berms, short walls, boulders, trees, wood fences, etc. within the greenway created on either side of the realigned US 50 as its primary noise reduction features since publication of the Draft EIR/EIS/EIS.
- 12-52 The commenter suggests that the EIR/EIS/EIS needs to evaluate the net increase in light pollution along the mountain side of realigned US 50. The commenter states incorrectly that the mountain side of realigned US 50 lacks development with existing sources of light.
- The commenter is presumably referring to the mountain side of existing Lake Parkway. Existing sources of lighting on the mountain side of Lake Parkway includes the Gondola Vista residential development and the electrical substation across Lake Parkway from Raley's. The lake side of Lake Parkway is fully developed and includes multiple sources of existing lighting (including the Heavenly Village Center, Forest Suites Resort in Lake Tahoe, Harrah's, and Montbleu). As described on page 3.7-46 of the Draft EIR/EIS/EIS, new sources of lighting on the mountain side of Lake Parkway would be limited to safety lighting at the US 50/Heavenly Village Way intersection and the US 50/Harrah's driveway intersection. The project would also install directional lighting for safety on the entry and exit to the pedestrian bridge and safety lighting along the path between Heavenly Village and the pedestrian bridge. As discussed under the header "Project Refinements to Alternative B," in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS, TTD has committed to implementing neighborhood design amenities in the Rocky Point neighborhood within the study area that would enhance the community character and safety elements of the neighborhood that remains after realignment of US 50, including street lighting. Safety lighting in these areas would not result in substantial night lighting and glare because standard design practices would limit spillover illumination. No further analysis is necessary.



- 12-53 The commenter states that their comments associated with the project-specific analysis also apply to the cumulative analysis and that light impacts associated with the project and other cumulative projects in the study area (i.e., Gondola Vista, and potential future development within the Edgewood Mountain Resort Recreation District) have not been addressed.
- Cumulative Impact 3.7-3 (beginning on page 3.19-26 of the Draft EIR/EIS/EIS) discusses cumulative increases in light and glare and concludes that new projects (such as those in Table 3.19-2) would not result in substantial night lighting and glare, because standard design practices would limit illumination. Also, codes, regulations, and design standards pertaining to lighting associated with any new developments would limit illumination. Design standards would control exterior materials of all new buildings and minimize reflectivity.
- At the time of writing of this document, there are no known plans for development of the property within the Edgewood Mountain Resort Recreation District. It would be speculative to try to analyze lighting impacts associated with any type of development on that property. The Gondola Vista Project is listed in the cumulative project list in Table 3.19-2 of the Draft EIR/EIS/EIS and considered in the impact analysis in Cumulative Impact 3.7-3. No further analysis is necessary.
- 12-54 The commenter contends that the viewpoint simulations along Lake Parkway do not appear to reflect the removal of trees. The commenter has compared trees marked for removal in Figure 1 in Appendix L of the Draft EIR/EIS/EIS with three visual simulations from the VIA (Appendix G of the Draft EIR/EIS/EIS). As described in Response to Comment 12-45, the VIA was prepared before the development of various design elements and context-sensitive aesthetic treatments that are incorporated into the realignment alternatives. The context-sensitive are shown in Exhibits 3.7-7, 3.7-8, and 3.7-9 of the Draft EIR/EIS/EIS. The viewpoint locations depicted in these exhibits are similar to those referenced in this comment. Because the commenter focused on visual simulations that have been superseded and the commenter does not identify any concerns related to the simulations included in Section 3.7, “Visual Resources/Aesthetics,” of the Draft EIR/EIS/EIS, for which impact determinations were made, no further analysis is needed.
- 12-55 The commenter again refers to the VIA exhibits excerpted in Comment 12-54 and contends that the simulations do not adequately reflect the widening of Lake Parkway and retaining walls associated with the realignment alternatives. The commenter also requests clarification on the total length of the retaining walls and associated height, and additional simulations of views showing pedestrians walking along sidewalks next to the retaining walls, crossing the roadway, and from the pedestrian bridge.
- With respect to the commenters request for a visual simulation showing pedestrians walking along sidewalks next to retaining walls, no at-grade sidewalks are proposed along the mountain side of realigned US 50 east of the Van Sickle Bi-State Park entrance. Exhibits 3.7-7 and 3.7-9 in the Draft EIR/EIS/EIS illustrate pedestrians on the opposite side of the roadway; these exhibits show the extent of retaining walls in these viewpoints and wall heights relative to bicyclists and vehicles. Exhibit 3.7-8 shows pedestrians crossing the roadway at the US 50/Heavenly Village Way intersection. Exhibit 4 in Appendix D of the Draft EIR/EIS/EIS illustrates pedestrian views from the pedestrian bridge as requested by the commenter.
- Because the commenter focused on visual simulations that have been superseded and the commenter does not identify any concerns related to the simulations included in Section 3.7, “Visual Resources/Aesthetics,” of the Draft EIR/EIS/EIS, for which impact determinations were made, no further analysis is needed.
- Page 3.7-27 of the Draft EIR/EIS/EIS describes the length and height of the retaining wall as follows:

Widening the road to four lanes along the current Lake Parkway alignment would require acquisition of additional right-of-way and construction of retaining walls along the east side of realigned US 50. The retaining walls would be constructed in the area from the entrance road to Van Sickle Bi-State Park to about 900 feet east of Harrah's Driveway. The walls would range in maximum height from 6 feet to 18 feet.

The highest retaining locations for the realignment alternatives are depicted on the Geometric Approval Drawings included in Appendix B of the Draft EIR/EIS/EIS.

- 12-56 The commenter states that the EIR/EIS/EIS must include a baseline scenic inventory for Van Sickle Bi-State Park and evaluate the impacts of the alternatives on scenic resources. The commenter also states that the EIR/EIS/EIS needs to assess the potential designation of Van Sickle Bi-State Park as a scenic resource, despite the 2011 and 2015 Threshold Evaluation Reports excluding a scenic assessment of the park. The commenter further states that the EIR/EIS/EIS must evaluate the impacts that the project would have on this resource, including areas of existing and potential facilities as identified in the Master Plan.

As described in Response to Comments 12-40 and 12-50, the Van Sickle Bi-State Park Master Plan (Master Plan) is not yet an adopted plan. Realigned US 50 would not result in significant visual impacts because, as described in Response to Comment 12-45, existing and planned camping and trail use areas associated with Van Sickle Bi-State Park would be setback and topographically separated from the realigned highway and would be screened from the highway by intervening stands of trees and existing Gondola Vista residential structures (currently under construction). For these reasons, further analysis is not necessary. See also Response to Comments 12-45, 12-47, 12-50, 12-61, and 12-68.

- 12-57 The commenter excerpts text from Section 3.17, "Relationship Between Local Short-Term Uses of the Human Environment and the Maintenance and Enhancement of Long-Term Productivity," of the Draft EIR/EIS/EIS and states that it is misleading to suggest the impacts have been minimized when the project would result in significant and unavoidable impacts. The commenter's requested revision is reasonable, and the text has been revised in this final environmental document. This change is presented in Chapter 3, "Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures," of this Final EIR/EIS/EIS. The correction does not alter the conclusions with respect to the significance of any environmental impact.

The third paragraph on page 3.17-1 of the Draft EIR/EIS/EIS has been revised as follows:

In the long term, the build alternatives would result in increased coverage (see Section 3.11, "Geology, Soils, Land Capability, and Coverage" of the Draft EIR/EIS/EIS); tree removal and disturbance and loss of sensitive habitats (see Section 3.16, "Biological Environment"); increases in ambient noise levels and visual impacts on neighborhood character in the Rocky Point residential area west of the Heavenly Village Center (see Sections 3.15, "Noise and Vibration," and 3.7, "Visual Resources/Aesthetics"); and the division of the Rocky Point neighborhood and displacement of residences. These impacts would be ~~reduced~~ minimized through implementation of mitigation measures intended to reduce environmental effects. However, the following impacts would remain significant and unavoidable after mitigation: the physical division of the Rocky Point neighborhood (for Alternatives B, C, and D), impacts on roadway segment operations (Alternative C), impacts on emergency vehicle access (for Alternative C), impacts on visual character (for Alternatives B, C, D, and E), impacts on scenic views or vistas (for Alternative E), potential structural damage from groundborne vibration related to construction (Alternative E), and increases in traffic noise (Alternatives B, C, and D).

- 12-58 This comment claims that Impact 3.10-1, “Potential for degradation of surface water quality due to construction activities,” is incomplete because it does not identify the volume of soil produced by excavation activities and the manner and location of its disposal. Impact 3.10-1 addresses potential construction-related effects on surface water quality. The volume of cut and fill materials and its disposal is addressed in Impact 3.5-4, “Increased generation of solid waste.” As described in Impact 3.5-4, land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities associated with Alternatives B, C, and D would generate approximately 5,700 cubic yards of solid waste, which would be disposed of at Lockwood Regional Landfill in Storey County, Nevada.
- 12-59 This comment concerns Impact 3.10-2, “Surface water quality,” and includes a statement regarding the analysis of fertilizer use and another regarding the sufficiency of the proposed stormwater improvements. Related to fertilizer use, the commenter faults the analysis in Impact 3.10-2 for not quantifying the amount of fertilizer use that would be permitted for maintenance of project landscaping. As described in the second paragraph on page 3.10-24 of the Draft EIR/EIS/EIS, the TRPA Code and Handbook of Best Management Practices require that landscaped areas use native or adapted plant species which require minimal amounts of fertilizer. In addition, the project would be required to prepare a fertilizer management program and a revegetation plan which describe the amount and method of any necessary fertilizer applications in accordance with TRPA Code Section 61.4.5. These provisions, which are linked to permit approval, provide strong protections against the risk of fertilizer migration into surface and ground waters. Therefore, quantifying the allowable amount of any specific fertilizer is unnecessary.
- Regarding the sufficiency of the proposed stormwater treatment enhancements, the commenter claims that the project does not commit to installing stormwater facilities that exceed the required 20-year/1-hour stormwater runoff volume, and therefore cannot support the beneficial finding of Impact 3.10-2. The comment correctly states that no regulation requires the project to capture more than the 20-year/1-hour storm, however the project proponent, TTD, has publicly stated their intent and commitment to maximize stormwater capture and enhance water quality through implementation of the project. This commitment has included coordination with local jurisdictions to identify enhancements that would create the maximum water quality benefit and to include these as project components. As described on pages 3.10-24 through 3.10-26 of the Draft EIR/EIS/EIS, these include many enhancements that are separate from the creation of oversized stormwater basins. These include capture of stormwater from the US 50/SR 207 intersection which currently discharges directly to Edgewood Creek, installation of curb and gutter and stabilization of bare shoulders on Stateline Avenue, installation of sediment traps on all drainage inlets within the project site, and upgrades to the US 50 stormwater infrastructure. Although the project proposes to maximize the size of stormwater basins, the capacity of the basins is dependent on final engineering. However, the beneficial finding of Impact 3.10-24 is based on the entire suite of water quality enhancements and not dependent solely on the additional capacity of these basins.
- 12-60 This comment addresses Impact 3.10-3, “Stormwater runoff.” The commenter states that the analysis of stormwater runoff should require facilities that can accommodate more than the standard 20-year/1-hour design storm. The TRPA stormwater runoff significance criteria specifically cites containment of the 20-year/1-hour design storm. Additionally, as described in Impact 3.10-2, “Surface water quality,” the project includes the construction of several stormwater capture basins which have the potential to capture runoff from events much larger than the design storm. The commenter also makes the claim that the analysis does not adequately discuss the permit conditions of the Stateline Stormwater Association (SSWA) facilities. SSWA does not currently hold a National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge to surface waters. The Nevada Division of Environmental Protection and the Environmental Protection Agency found that SSWA’s

NPDES permit was unnecessary and it was terminated in October 2015. Finally, the commenter states that stormwater BMPs should be installed prior to construction. TRPA Code Section 5.3.1 requires that temporary water quality BMPs be installed and inspected prior to the start of construction or ground disturbance.

12-61

The commenter refers to Impact 3.3-4 of the Draft EIR/EIS/EIS related to changes to the quality of recreation user experience and states that no scenic inventory has been performed; thus, the existing baseline is unknown. The commenter also asks why Appendix K of the Draft EIR/EIS/EIS, "Noise Modeling Data," shows that a 5-decibel (dB) adjustment was applied to the discrete receptors located in Van Sickle Bi-State Park.

As stated on page 3.7-4 of the Draft EIR/EIS/EIS, "Because [Van Sickle Bi-State Park] is relatively new (opened in summer 2011), the park has not yet been officially added to TRPA's list of public recreation areas." Additionally, recreation users in Van Sickle Bi-State Park would have limited views of the project because, as stated on page 3.7-4, "the majority of the park is set back and separated from Lake Parkway by existing private parcels (Exhibit 2-1), except at the park entrance and a short section of frontage near the state line," and as described on page 3.7-28, "Recreationists at Van Sickle Bi-State Park would have little or no view of the project site once inside the park because of screening by topography and existing tree cover." Therefore, characterization of the existing scenic baseline is described and assessed to the extent necessary for analysis of project impacts in the Draft EIR/EIS/EIS.

A 5-dB adjustment was included to account for noise attenuation provided by stands of forest in the park and topographic separation from the roadway. This is explained on page 3.15-19 of the Draft EIR/EIS/EIS. Here the analysis states, "...for those receptors located in heavily forested areas of Van Sickle Bi-State Park, adjustments were made to the modeled noise levels to account for the additional attenuation provided by stands of trees based on applicable guidance (Hoover & Keith Inc. 2000:6-9, as cited in Caltrans 2013a:7-8)."

The commenter also requests a map "which indicates which noise measuring sites in [Van Sickle Bi-State Park] correspond with the numbered values" in the tables in Appendix K of the Draft EIR/EIS/EIS. A map showing all discrete receptor locations analyzed in the noise analysis is provided in Figure 3 of the Noise Study Report. The Noise Study Report is cited as follows in Section 3.15, "Noise and Vibration," of the Draft EIR/EIS/EIS and is available at the TTD and TRPA offices during normal business hours:

California Department of Transportation. 2015b (November). *Noise Study Report, US 50/South Shore Community Revitalization Project*. Prepared by LSA Associates, Inc.

12-62

The commenter asserts that the list of noise abatement options that can be selected are not required thus the requirement to implement all feasible measures related to a significant and unavoidable impacts has not been met. Mitigation Measures 3.15-3a, 3b, and 3c require that TTD prepare a study supplemental to the Noise Abatement Decision Report that identifies all necessary measures to ensure attainment of all applicable TRPA thresholds and identify all feasible measures to reduce traffic noise increases as stated in the mitigation. A set of feasible noise reduction measures that would benefit the most receptors and meet noise standards would be included in the study. This additional study would be required at a later point in the planning and design process when more specific project design details are available, but before acknowledgement of the TRPA permit. In spite of these measures, the traffic noise impact would remain significant and unavoidable because some of the improvements would require owner approval for modifications to private property (e.g., installation of noise insulation features) and it may not be feasible to reduce substantial increases in noise at every receptor site. For these reasons, the Draft EIR/EIS/EIS has met the requirement to implement all feasible measures related to a significant and unavoidable impact related to traffic noise, and as it relates to the physical division of the Rocky Point neighborhood (Impact 3.4-1).

- 12-63 The commenter references Impact 3.4-4 and page 3.4-43 and states that the project does not relocate individuals in Single Room Occupancy units (SROs) and, therefore, does not provide for relocation of all affordable housing units. The commenter also asserts that the analysis in the Draft EIR/EIS/EIS is based on outdated data regarding affordable housing and available rental units.
- See the discussion under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS and Response to Comment 66-4 regarding relocation of individuals in SRO units.
- The City of South Lake Tahoe provided similar comments regarding updating affordable housing and available rental units. See Response to Comment 8-1.
- 12-64 The comment expresses concern related to locating replacement housing outside the project site and the effects of removing SRO units without replacement. The League to Save Lake Tahoe had similar comments regarding the location of replacement housing. See Response to Comment 11-1. See the discussion under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS and Response to Comment 12-64 related to displacement of SRO units.
- 12-65 The commenter states the document does not identify whether displaced units are part-time/seasonal housing or only full-time housing. The impacts related to displaced units reflect the maximum number of units that could be impacted by the project regardless of housing occupancy. The impact analysis does acknowledge that the majority of affected units are occupied by renters and few affected units are occupied by owners (see page 3.4-43 of the Draft EIR/EIS/EIS).
- 12-66 The commenter asserts that the Draft EIR/EIS/EIS must disclose impacts related to locating replacement housing outside of the project site that could result in relocating Spanish-speaking residents to within the service area of a school that does not provide bilingual programs. As discussed in Response to Comment 11-1 and in the discussion under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS, TTD has formalized its commitment to construct replacement housing within the project area watershed, with the preferred location within the proposed mixed-use development sites. Therefore, the commenter’s concern is no longer relevant.
- 12-67 The commenter asserts that “the DEIR/S/S does not discuss whether new mixed-use [development] sites would be comparable with regards to noise (i.e., Exhibit 3.15-2 indicates noise levels at mixed-use sites 1 and 2 would violate several criteria and/or would be placed in an area with a less protective noise standard than where residents currently live; in other words, the new housing units would be subject to far more noise than the existing units).” As stated on page 1-7 of the Draft EIR/EIS/EIS, the project would provide an opportunity for new mixed-use, transit-oriented development to include replacement housing and commercial space that could be used by residents and businesses displaced by the transportation improvements with Alternatives B, C, and D. However, there is no certainty that the residents displaced from the Rocky Point neighborhood would choose to live at one of the mixed-use development sites. Thus, the noise impact analysis does not focus on a comparison of noise exposure levels at existing residential units that would be replaced to the level of noise exposure at the mixed-use redevelopment sites. Instead, it focuses on whether existing residents would be exposed to substantial increases in noise or noise levels that exceed local standards—see Impact 3.15-3: Traffic noise exposure at existing receptors—and whether the mixed-use development sites would be compatible with applicable noise standards. However, a comparison can be made by examining the noise level estimates in Appendix K of the Draft EIR/EIS/EIS, “Noise Modeling Data.” Tables in Appendix K, “Noise Modeling Data,” indicate which receptor parcels would be displaced with each alternative and the existing traffic noise

level. For instance, receptors 20, 23-27, 30, 35, 40-42, 44-48, 55-62, 65-67, 74-78, 85-87, and 95 would be displaced with Alternative B. The existing noise levels at these receptors can be compared to the receptors representing the mixed-use development sites, which are represented by receptors 159 and 160 and depicted on Exhibit 3.15-2. As stated in the comment, much of the housing at the mixed-use redevelopment sites would be exposed to higher exterior noise levels than the residential units that would be displaced.

As stated in Section 1.3 of the Draft EIR/EIS/EIS the objectives of the project are to improve the corridor consistent with the Loop Road System concept of the Tahoe Regional Planning Compact, improve multimodal mobility and safety, minimize congestion, minimize neighborhood “cut-through” traffic, and revitalize the study area.

Note that the analysis under Impact 3.15-4 (beginning on page 3.15-57) concludes that any common outdoor activity areas included on the mixed-use redevelopment sites under Alternatives B, C, or D could be exposed to traffic noise levels that exceed the City of South Lake Tahoe’s 60 Community Noise Equivalent Level (CNEL) standard. To address this impact Mitigation Measure 3.15-4 requires the implementation of noise protection measures to ensure that outdoor activity areas on the mixed-use redevelopment sites are not exposed to noise levels greater than 60 CNEL.

- 12-68 The commenter disagrees with the finding that the project is located in an urban area, as described in Impact 3.11-2, “Increased erosion and alteration of topography during construction” (page 3.11-25). The commenter states that Van Sickle Bi-State Park is only urban along one edge. The proposed project is located within or immediately bordering the intensively developed Tourist Core Town Center. The proposed alignment does cross the urban margin of Van Sickle Bi-State Park (approximately 650 linear feet), however the majority of the study area in the vicinity of the Van Sickle Bi-State Park is located on several privately-owned parcels that are situated between the Park and the proposed alignment of US 50. In fact, at the writing of this document, one of these parcels is currently being developed as a luxury residential complex (i.e., Gondola Vista). Therefore, the project site located in an urban setting as described in Impact 3.11-2 and no revisions are required. See also Response to Comment 12-45 regarding the urban character of the project site.

The commenter also claims that the analysis does not discuss the volume of soil that would be disturbed or removed through cut and fill activities. As described in Response to Comment 12-58, the volume of cut and fill materials and its disposal is addressed in Impact 3.5-4, “Increased generation of solid waste.”

- 12-69 The comment is related to Impact 3.14-1, “GHG emissions and consistency with the Regional Transportation Plan.” The commenter asserts that emissions need to be identified and that growth rates assumed in the 2012 and 2017 RTP have already been exceeded, which need to be accounted for in future estimated emissions.

CEQA Guidelines 15183.5 (tiering and streamlining the analysis of greenhouse gas emissions) allows lead agencies to rely on existing programmatic analyses of greenhouse gas emissions for project-specific environmental analyses, provided the programmatic EIR adequately analyzed the reasonably foreseeable significant environmental impacts (i.e., GHG emissions) of the project being evaluated. Further, in accordance with CEQA 15183.5 (b), GHG emissions can also be evaluated at a programmatic level if the project is shown to be consistent with applicable “Plans for the Reduction of Greenhouse Gas Emissions.”

Project-generated GHG emissions would occur from construction during roadway alignment work and mixed-use development. Construction emissions were estimated for all action alternatives in Impact 3.14-1 and as discussed in the Draft EIR/EIS/EIS “there would be nominal construction-related GHG emissions of less than 1,100 metric tons of carbon

dioxide equivalent per year (MTCO<sub>2e</sub>/year) and 660 MTCO<sub>2e</sub>/year (2030 adjusted threshold) for all the build alternatives” (page 3.14-10). As discussed on page 3.14-10 these thresholds were established to “assess consistency with California’s 2030 GHG target” and subsequently compliance with these thresholds would also show consistency with California’s *Plan for the Reduction of Greenhouse Gas Emissions* (i.e., 2017 Scoping Plan).

Generally, a project’s operational emissions are associated with mobile sources (e.g., trip generation and VMT) and energy use from land use development. As discussed in the Draft EIR/EIS/EIS, “VMT (and resultant GHG emissions) associated with the US 50/South Shore Community Revitalization Project were evaluated in the analysis of the 2012 RTP/SCS EIR/EIS,” a certified programmatic EIR/EIS consistent with CEQA Guidelines Section 15168 (program EIR), and long-term operational GHG emissions associated with population increases, vehicle trips and VMT, and land use development were found to be significant and unavoidable. Therefore, the potentially significant long-term increase in GHG emissions associated with regional growth increase and development has already been identified. Consistent with the CEQA Guidelines the project-level analysis focused on showing consistency with approved programmatic analyses (e.g., RTP/SCS EIR/EIS) and plans for the purpose of reducing GHG emissions. As discussed in the Draft EIR/EIS/EIS, the adopted RTP/SCS complies with State-mandated VMT per capita reduction targets (and associated GHG reductions), as regulated by SB 375. Thus, “because SB 375 is a component of the AB 32 Scoping Plan,” (page 3.14-12) projects that are consistent with the RTP/SCS would also be consistent with the State’s adopted plan for GHG emissions reduction. The GHG analysis is consistent with all CEQA requirements and all potential GHG-related impacts have been adequately identified and evaluated. No further analysis is necessary.

12-70

The comment is related to Impact 3.14-2, “Vulnerability to climate change risks” and states that the project should require stormwater capture facilities to be designed to accommodate the 100-year storm flows. The commenter further expresses concern that the Draft EIR/EIS/EIS did not address potential impacts that may result from installation of the retaining wall due to ground disturbance and saturation.

Regarding water quality and stormwater basin design, all proposed facilities are described on pages 3.10-24 through 3.10-26 in Chapter 3.10, “Water Quality and Stormwater Runoff” of the Draft EIR/EIS/EIS and Responses to Comments 11-17 and 11-8 explain why revisions to the proposed facilities are not necessary. Regarding climate change vulnerability, the Draft EIR/EIS/EIS explains that “the preliminary design of the project’s stormwater basins indicates that, on average, they can accommodate five times the regulatory requirement and therefore able to accept flows from a much larger storm” (page 3.10-26). In addition to stormwater basin capacity, as discussed in Impact 3.14-2 of Chapter 3.14, “Greenhouse Gas Emissions and Climate Change,” the project would include various improvements that would help with stormwater retention, such as sediment traps, infiltration basin, and sand traps,” further reducing stormwater runoff and improving capture” (page 3.14-17 of the Draft EIR/EIS/EIS). Climate prediction models can be used to attempt to describe how weather patterns (e.g., annual average precipitation) may change over time in certain geographic areas. However, there is no fine-grained modeling tool to determine precipitation or stormwater flows for future years at the project-level and, therefore, it is not used to determine project-level design.

Regarding the retention wall, all site-specific geologic and soil conditions are discussed in detail in Section 3.11, “Geology, Soils, Land Capability, and Coverage.” As discussed in the Draft EIR/EIS/EIS, “Chapter 18 of the California Building Code regulates the excavation of foundation and retaining walls, and Chapter 33 regulates grading activities, including drainage and erosion control construction on unstable soils, such as expansive soils and areas subject to liquefaction” (page 3.11-7). Impact 3.11-2 in Section 3.11 of the Draft EIR/EIS/EIS discusses potential impacts from grading and construction activities and found



that “because the soils of the project site are not highly susceptible to erosion, temporary and permanent Best Management Practices would be installed as requirements of the necessary TRPA and Lahontan RWQCB permits” (page 3.11-26). Further, the Draft EIR/EIS/EIS explained that “the project site is not located on sloping ground that is potentially subject to landslides, rock falls, and debris/earth flows, which could become more frequent or severe as storm patterns change” (page 3.14-17).

Thus, the analysis in the Draft EIR/EIS/EIS is based on best available information, project design features, and reasonable foreseeable changes in climate that may affect the project. As the Draft EIR/EIS/EIS concludes, considering the aforementioned project features and requirements in place, “changes in local weather patterns as a result of climate change would not be expected to have a substantial impact on the project” (page 3.14-17). No further analysis is necessary.

12-71

The commenter states that the Draft EIR/EIS/EIS does not display existing tree cover in the project site or disclose which trees would be removed by the project. The commenter also states that the analysis of tree removal includes no evaluation relative to TRPA threshold requirements for late seral/old growth forests, and the tree removal and replanting plan (required by Mitigation Measure 3.16-3) should be developed as part of the EIR/EIS/EIS and available for public review.

Regarding tree cover and locations where tree removal would occur, Appendix L, “Tree Survey Memorandum,” of the Draft EIR/EIS/EIS describes the tree survey conducted for the project site; shows overall tree cover on an aerial-photo base map; and displays trees that could be removed by size class and action alternative, at a level possible and appropriate for the current level of project design.

Regarding consistency of proposed tree removal with the TRPA threshold for late seral/old growth habitat, trees would not be removed in areas where the threshold applies. TRPA-designated urban areas, and areas of the montane zone (lower than 7,000 feet elevation) within 1,250 feet of urban areas that are not actively being managed for late seral and old growth conditions, are excluded from the calculation for attainment of this threshold (TRPA 2016). The project site is located almost entirely within TRPA-designated urban areas; non-urban areas in the project site are small portions within Van Sickle Bi-State Park. Under any of the action alternatives, tree removal is expected to occur only within urban areas.

As described in Mitigation Measure 3.16-3 of the Draft EIR/EIS/EIS (page 3.16-27), a Tree Removal, Protection, and Replanting Plan (Plan) shall be prepared by the project proponent to provide tree protection measures to comply with the performance criteria and other requirements of Chapter 61 of the TRPA Code, prevent damage to trees that are proposed to remain, and determine appropriate tree replanting locations and approaches to occur in the project site. Because detailed design of the project has not been completed, and the marking and inventorying of specific trees to be removed based on further design would be used to develop the Plan, the Plan would be completed during/after detailed design and prior to permit acknowledgement by TRPA.

12-72

The commenter questions the meaning of “relatively short duration” in the statement on page 3.15-23 of the Draft EIR/EIS/EIS, which states, “Due to the linear nature of the project and the relatively short duration of construction activity in any one place, no single receptor location would be exposed to construction-related noise for an excessive period of time.” The exact number of days noise-generating construction activity would occur in any one location is not known at this time. However, it is in no way expected that noise-generating construction activity would take place in the same location during the entire construction period, especially when compared to the construction of a facility that is not linear in nature.

The commenter also states that “while noise from construction may be exempt during daytime hours, the [EIR/EIS/EIS] must still analyze and disclose the impacts.” The comment, however, does not offer specific information or evidence that the EIR/EIS/EIS does not analyze or disclose impacts associated with construction-generated noise.

The commenter also suggests that noise-generating construction activities outside the exempt daytime hours should be prohibited unless an emergency. The comment is addressed in Response to Comment 12-73.

12-73

The commenter suggests that noise-generating construction activities outside the exempt daytime hours should be prohibited unless an emergency. The comment alleges that the EIR/EIS/EIS does not evaluate alternative options to avoid nighttime construction work under Alternative E (Skywalk). The comment asks whether traffic could be re-routed around Lake Parkway/Montreal Road/Park Avenue during periods of light traffic (e.g., shoulder season, weekdays). The comments also request the criteria that would be used to determine whether construction activity can occur during different times. Whether construction would need to be performed during noise-sensitive nighttime hours is not known at the time of preparing this EIR/EIS/EIS but may be a possibility if other options are not available. It is the nature of constructing an elevated bridge that would require full closure of the road for safety purposes. If Alternative E were selected TTD would be incentivized to find ways to avoid having noise-generating construction activity at night, because this would make the project more cost-effective and less of a nuisance to nearby noise-sensitive receptors. Requiring that construction activity only take place during daytime hours may result in a longer construction period and more severe traffic impacts when traffic volumes are greater. Also, routing traffic to local streets such as Lake Parkway, Park Avenue, and/or Montreal Road would have the potential to result in impacts along these roadway segments. Construction-related traffic impacts are addressed in greater detail under Impact 3.6-7 of the Draft EIR/EIS/EIS. On page 3.6-61 of the Draft EIR/EIS/EIS, the analysis explains that Alternative E would require construction outside of the established daytime hours to minimize traffic conflicts, and weather conditions constrain the timing of construction to hours that would generally be subject to reduced traffic flow rates.

The commenter suggests that the EIR/EIS/EIS discuss the existing noise levels and expectations at the tourist core. The expectations of exterior noise levels at the tourist core is engrained in the noise standards applicable to the casino area. As shown in Exhibit 3.15-1, TRPA has a standard of 65 CNEL for the casino area, except for the contour-based noise standard in the US 50 transportation corridor, which specifies that the 65 CNEL noise contour generated by traffic on US 50 shall not extend more than 300 feet from the highway’s edge. Also, community expectations about construction noise are also inherent to the exemptions for daytime construction activity established by TRPA, Caltrans, the City of South Lake Tahoe, and Douglas County. Moreover, outdoor areas around casinos are generally not considered to be noise-sensitive land uses where noise exposure could result in health-related risks to individuals or where quiet is an essential element of their intended purpose. The commenter suggests that the EIR/EIS/EIS discuss the noise-related expectations of people visiting the tourist core. The EIR/EIS/EIS addresses these expectations by evaluating whether the project alternatives would result in noise levels that exceed the noise standards established for the tourist core.

12-74

The comment concerns Mitigation Measures 3.15-3a, 3.15-3b, 3.15-3c, and 3.15-3d which require the implementation of traffic noise reduction measures to reduce traffic noise exposure at affected receptors. The commenter states that these mitigation measures do not define *how* the feasibility of noise reduction measures would be determined. This is correct. The list of Performance Requirements of these mitigation measures are clearly stated. The first performance requirement requires that measures be implemented to ensure that TRPA noise thresholds are not exceeded due to implementation of the project at specific receptors. The list

of Noise Reduction Features indicates the different possible ways the Performance Requirements could be achieved. As the comment points out, the EIR/EIS/EIS does not specify exactly which noise reduction features would be implemented to achieve the performance requirements. Instead, it includes discussion showing that the performance requirements would be achievable if some combination of the Noise Reduction Features are implemented.

The commenter also points out that the EIR/EIS/EIS does not discuss the findings of the FHWA Noise Abatement Decision Report, which determined that sound barriers would not be funded. More specifically, it's important to note, that the Noise Abatement Report applied the federal criteria for determining whether a sound barrier would be feasible and, applying these criteria, concluded that they would not be eligible to receive federal funding. Therefore, the full funding needed to build sound barriers would need to come from other sources.

The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.

- 12-75 The commenter asserts that the project would result in growth-inducing impacts because the project would cause population growth, increased visitation, economic growth, and improved LOS that would allow for more development. See Response to Comment 12-24.
- 12-76 The commenter refers to Section 4.5.1, "Section 4(f) *De Minimis* Findings," of the Draft EIR/EIS/EIS and asserts that because there is no baseline scenic inventory, it cannot be concluded that there are no visual resource impacts to Van Sickle Bi-State Park. The commenter also states that noise impacts are also uncertain. See Response to Comment 12-61.
- 12-77 The comment includes a table of noise receptors, associated acquisition disposition for the project, and noise levels. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.
- 12-78 The comment includes correspondence with TTD staff regarding requests for documents cited in the Draft EIR/EIS/EIS and regarding maps and information associated with the noise analysis. Response to Comment 12-61 addresses the commenter's request for mapping of noise data and adjustment used to model noise impacts in Van Sickle Bi-State Park. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.



# South Tahoe

## CHAMBER OF COMMERCE

Letter  
13

July 1, 2017

Russ Nygaard  
Tahoe Transportation District  
PO Box 499  
Zephyr Cove, NV 89448  
[info@tahoe transportation.org](mailto:info@tahoe transportation.org)

Mr. Nygaard,

Thank you for the opportunity to comment on the Draft EIR/EIS US 50/South Shore Community Revitalization Project, aka-Loop Road.

### Comments

- Your Summary states: "Commercial core revitalization is intended to increase visitor spending and catalyze adjacent private construction investment." However, the Economic Analysis for the project states that the "businesses in the area will realize up to \$5.5 million in loss per year during construction and implementation." Although short term in nature, this economic loss could and will destroy a huge number of small, locally-owned businesses in the stateline area. These businesses operate on such a small profit margin that a loss of any kind for any length of time is unsustainable.
- The businesses in the area have reported that even a short period of interruption would kill them.
- 24% of the businesses in the area receive 75% of their customers from drive-by traffic.
- Your economic analysis of the project states that the degree to which a successful outcome is realized depends on good implementation of the project and other external factors such as adequate parking, adoption by pedestrian users and effective signage. This project has inherent problems with the successful implementation of these items.
  - Parking: NO NEW PARKING is proposed.
    - Current parking is inadequate:
      - The Village Center
      - Parking structure at Heavenly Village
      - The casinos
      - Etc.

13-1

- ◆ This parking is already overburdened during peak times. The casinos recently announced that they would start charging \$20/\$25 during holidays, the Celebrity Golf Tournament and concert weekends. This is essentially all summer. The Village Center is so overburdened that they barely have enough parking for their current customers and employees/tenants. And, the parking structure at Heavenly Village exceeds capacity all summer long, with little or no availability for their employees/tenants.
  - Pedestrians: If there is nowhere to park, where will the pedestrians come from?
  - Signage: The city's sign ordinance is, at best, a nightmare.
- How does this translate to making the Stateline corridor more bikeable and walkable? Plus, where will the customers come from, since you are taking away these businesses' drive-by market. This project is simply a bypass, cars will be able to drive Pioneer Trail in Meyers, then take this new highway and will never drive past a single City of South Lake Tahoe business. You only have to look to Carson City to see the detrimental effect to business that this type of bypass brings to a community.
- Tahoe Transportation District is currently failing at their primary function, bus service. How can we then expect TTD to competently implement at \$74+ million project?
- Measure T was a clear message to the City of South Lake Tahoe, TTD and TRPA that the Loop Road project is less than satisfactory in it's current form and that the voters want a say on a project of this magnitude. Why then are you not listening?
- Our area was recently changed from a Rural to Urban transportation area (apparently in an effort to meet funding requirements for the Loop Road project and possibly other projects in the Regional Transportation Plan). This new designation has had detrimental impacts on transportation services between the Lake Tahoe Basin and Carson City/Carson Valley. Why destroy proven transportation services?
- The construction timeframe on the Loop Road will, I believe, cause unnecessary additional congestion in an already congested area for many years. Plus, will take place during CalTrans projects on Echo Summit (bridge replacement) and in Meyers (roundabout at 50/89).
- We submit that Park Avenue on both the mountain-side of Lake Tahoe Blvd that connects to Montreal Ave. then Lake Parkway and on the lake-side that turns into Pine Blvd. and then Lake Parkway fulfills the intent of Article V(2) of the Tahoe Regional Planning Compact (Public Law 96-551), 1980 (Compact).
- The document states that current conditions exist where cars are cutting through the neighborhood thereby making it unsafe for families. However, your proposed plan cuts through the same neighborhood putting families at risk. Where is the logic in this plan?
- South Lake Tahoe, like many cities, is in a housing crisis. Taking out up to 97 housing units to construct an unnecessary bypass will cause additional burden on the citizens of our community. Also, it will affect a mostly Hispanic neighborhood. This population is least likely to raise vocal opposition to the project. They may have concerns about immigration status or language barriers; however, not taking their concerns into account seems somewhat racist.
- The preferred alternative is the most invasive where it comes to housing. There are nearly 100 single family units (houses, duplexes and multi-family dwellings) that will be removed.
- Impacted utilities: Who will pay for the relocated utilities? The rate-payers who voted to get this project on the ballot? Or the tax-payers as a whole?

13-1  
cont.

13-2

13-3

13-4

13-5

13-6

13-7

- A key economic/personal component is missing from the document...eminent domain. How will you proceed if there are hold outs from property owners?

In conclusion, we believe that at a minimum, the voters should have a say on whether or not this project proceeds. If it is such a great project, then the voters will vote accordingly. At a maximum, we feel that this project fails to serve the California residents and business owners and Alternate A – No Build, should be the option selected.

13-8

Please contact me at (530) 545-2623 or [tami.wallace@hotmail.com](mailto:tami.wallace@hotmail.com), if you need further information.

Respectfully Submitted,

*Tamara Wallace*

Executive Director  
South Tahoe Chamber of Commerce

**Letter  
13**

**South Tahoe Chamber of Commerce**  
July 1, 2017

13-1

The commenter asserts that the short-term economic losses from interruptions of drive-by customers, lack of adequate parking, and signage issues would damage local businesses and could cause smaller businesses to permanently close. See Response to Comment 11-1 regarding the analysis of parking impacts associated with implementation of the project. Estimated changes to business activity in the study area are described on pages 4-18 through 4-23 of the Draft EIR/EIS/EIS, which concludes that the long-term increase in business activity would exceed any potential short-term losses.

[T]he project would implement a Transportation Management Plan (TMP) that would use all reasonable and feasible measures to minimize traffic disruption and maintain access to businesses during construction; however, reduced business activity from temporary discouragement of access to businesses within the tourist core could not be eliminated.

The project would result in a permanent change in visibility of businesses within the project site. However, the types of transportation improvements proposed as part of the project, including complete streets improvements through the tourist core, streetscape improvements, providing expanded opportunities for events, and enhancing public transit could make the project site more attractive to visitors and local residents. These types of changes are estimated to result in a long-term increase in business activity that would exceed the short-term losses in retail sales associated with construction activities. Therefore, Alternatives B, C, and D transportation improvements would not have an adverse impact on long-term business activity within the study area.

As described on page 4-22 of the Draft EIR/EIS/EIS, the 2013 Economic Analysis found that “[d]uring the short-term, construction and transitional period, potential retail sales losses are estimated to range between \$900,000 to \$5.5 million per year...” (TTD 2013) As described in Section 2.4.6, “Construction Overview,” of the Draft EIR/EIS/EIS, construction of the

project-related transportation improvements is anticipated to occur over a three-year period. The highway realignment would be constructed before any improvements would happen along existing US 50 through the tourist core, decreasing the extent of time individual businesses would be affected by project construction.

Outreach with businesses in the study area conducted for the 2013 Economic Analysis showed that many of the businesses (73 percent of survey respondents) had been operating for more than a decade, 20 percent had been operating between 6 and 10 years, and a small proportion (7 percent) had been operating for less than 2 years. The longevity of businesses in the study area demonstrates that they have endured challenging economic times. On page 4.-22 of the Draft EIR/EIS/EIS, the analysis describes that construction activities could still be perceived as a deterrent to business activity in the study area and would be estimated to result in a loss of between 1 and 6 percent of existing retail sales in the short-term.

The information in the Draft EIR/EIS/EIS has been supplemented with information from the *Economic Analysis Update, US 50 South Shore Community Revitalization Project* (TTD 2018). The updated analysis recognizes that businesses that are currently marginally viable and heavily dependent upon pass-by-traffic for convenience purchases would be more at risk than destination-based businesses. It further indicates that the long-term viability of such businesses in a higher-value, pedestrian-oriented environment may also be limited, as demand increases for alternative retailers to occupy the limited space available in the area. Some business closures are possible.

The updated economic analysis recognizes that the area of greatest impact to retail sales volumes would be in the construction zone for the new intersection of US 50 and Pioneer Trail. This area contains several high-volume retailers that benefit from pass-by-traffic of US 50 but also function as neighborhood retailers for the area immediately to the south. Some of these businesses would be demolished for project construction and have indicated their relocation intentions to TTD (TTD 2018). Those that remain at the fringes of the intersection construction area could be negatively impacted by the disruption to visibility and access. To the extent visibility and access can be maintained during construction, the negative impact to sales can be mitigated. No negative impacts on casino visitor retail spending are anticipating, given that the new alignment would provide access to these businesses and any retail sales within the resort-casinos are ancillary to the destination-oriented uses within the structures. (TTD 2018)

As described on page 4-21 of the Draft EIR/EIS/EIS, “the project would enhance signage in the project site, which would include signage for existing parking areas. This would attempt to enhance visitors’ and residents’ perceptions of parking opportunities in the project site.” The project would not reduce parking (see the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS for a description of parking enhancements included in the proposed project since publication of the Draft EIR/EIS/EIS) and would implement a signage program that would assist in directing visitors to parking in the project site. With respect to the comment about signage, the commenter offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.

13-2

The commenter questions how the project will make the tourist core more conducive to bicycles and pedestrians and asserts that the project is a bypass that would allow cars to drive Pioneer Trail in Meyers to the realigned highway without ever driving past any businesses in the City of South Lake Tahoe. Many vehicles traveling to or from the tourist core already use Pioneer Trail and cut through the Rocky Point neighborhood. Additionally,



the project does not propose to expand the capacity of Pioneer Trail. Visitors to South Lake Tahoe and the state line area may use Pioneer Trail to reach the tourist core area; however, visitors often choose to travel throughout South Lake Tahoe along US 50 to reach amenities throughout the city and beyond, such as Ski Run Marina, Camp Richardson, Fallen Leaf Lake, and Emerald Bay as well as restaurants and shopping. To reach these destinations, visitors would be required to drive along US 50 through the city and would pass many businesses within the city. The commenter offers no specific information or evidence that the analysis presented in the Draft EIR/EIS/EIS is inadequate; therefore, no further response regarding the effect of vehicle patterns on businesses in the City of South Lake Tahoe can be provided.

The tourist core would become more bicycle- and pedestrian-friendly because with the reduction in the number of vehicle travel lanes proposed for the roadway through the tourist core, the project would construct bicycle lanes and enhanced sidewalks with street furniture, such as benches, lighting, public art, and public gathering spaces or common areas along existing US 50 (page 2-14 of the Draft EIR/EIS/EIS). Additionally, as described in Impact 3.6-8 of the Draft EIR/EIS/EIS, pedestrian and bicyclist safety would improve in this area because “exposure to vehicular traffic would be reduced with the improvements associated with Alternative B, including a pedestrian bridge over the new US 50 alignment connecting Van Sickle Bi-State Park to the Stateline area; shoulders/bicycle lanes and pedestrian sidewalks along Lake Tahoe Boulevard (existing US 50) for the full length of the study segment; and bicycle lanes/shoulders along the new US 50 alignment with sidewalks on at least one side of the roadway,” and “Safety of the existing pedestrian crossings along US 50 would be improved because of reduced traffic volumes and shorter crossing lengths associated with the narrowing of the existing US 50” (page 3.6-67 of the Draft EIR/EIS/EIS).

13-3 The commenter questions TTD’s ability to implement an over \$74 million project and asserts that the project is not satisfactory and voters want a say on the project, and summarizes effects on transportation services in the area caused by re-designating the area from a “Rural” to an “Urban” transportation area. This commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.

13-4 The commenter states their belief that the project would cause unnecessary additional congestion and would occur simultaneously with Caltrans’s projects on Echo Summit and in Meyers. Traffic congestion impacts are assessed under Impacts 3.6-1, 3.6-2, 3.6-3, 3.6-12, and 3.6-13 in Section 3.6, “Traffic and Transportation.” The possibility exists that timing for construction of the project may overlap with the timing of Caltrans projects located over 7 miles to the southwest of the study area in Meyers or elsewhere. Construction of the project would be phased over multiple construction seasons to minimize impacts to residents, businesses, and traffic. TTD would work with Caltrans, NDOT, City of South Lake Tahoe, and Douglas County to coordinate the agencies’ ongoing construction projects to further reduce impacts to the community. Before and during construction, notifications including on TV, radio, newspaper, internet, and signage on major routes in and around Lake Tahoe, would be made to the public alerting them to construction and providing information on alternative routes. As described in Section 2.4.6, “Construction Overview,” and in Impact 3.6-7, construction of the project would be implemented to minimize transportation disruptions.

The Caltrans projects referenced in this comment are over 7 miles southwest of the project site. TRPA has received applications for the Meyers Roundabout, with construction planned for 2018, and the Echo Summit wall project, with 95 percent design plans and construction planned for 2019. Construction for these Caltrans projects and the proposed project would most likely not occur at the same time. Congestion effects from these projects would not combine with those of the project to result in a new significant cumulative impact.

- 13-5 The commenter asserts that existing roadways in the study area meet the intent of Article V(2) of the Tahoe Regional Planning Compact. As described on page 1-1 of the Draft EIR/EIS/EIS, the Nevada portion of the “loop road” was built. The proposed project would complete the loop road in California. This commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 13-6 The commenter asserts that the project cuts through a neighborhood resulting in similar safety risks to families as the existing neighborhood traffic. The commenter also notes that displacing 97 housing units would be a burden on the citizens of the community and would also affect a mostly minority community. The comment is accurate in that the realigned US 50 would generally follow the same route as the existing route used by existing cut-through traffic in the Rocky Point neighborhood. However, the road would be widened, which would allow space for shoulders that could accommodate bicycles and sidewalks would be constructed along both sides of the realigned US 50 through this neighborhood between Heavenly Village Way and the realigned US 50/Pioneer Trail intersection (page 2-15 of the Draft EIR/EIS/EIS). Because of these improvements, pedestrians and bicyclists traveling along US 50 through the neighborhood would be better protected from vehicles compared to existing conditions.
- As described on pages 3.4-43, 3.4-44, 3.4-46, and 3.4-48 of the Draft EIR/EIS/EIS, the maximum number of units displaced by Alternatives B, C, and D would be 88, 83, and 78 housing units, respectively. As described in Chapter 2 and under Impact 3.4-4 of the Draft EIR/EIS/EIS, as part of the project, TTD would provide relocation assistance to all eligible displaced owners and tenant residents and would construct replacement housing equal to or greater than the number displaced prior to displacing any residents so that residents are able to have affordable housing to move to and so that affordable housing supply in the study area is not reduced by the project (pages 2-5 and 2-6, and 3.4-42 through 3.4-50 of the Draft EIR/EIS/EIS).
- A list of public involvement activities and outreach to minority and low-income populations in the affected neighborhood is included in Table 3.4-15 on page 3.4-59 of the Draft EIR/EIS/EIS. Public outreach efforts began in 2013 and as described on page 3.4-59, “Public involvement activities have specifically targeted potentially affected minority and low-income populations, including door-to-door distribution of flyers with information about the project in English, Spanish, and Tagalog. These flyers were also available online and at the public workshops conducted for the project.” TTD has also coordinated outreach efforts with the South Lake Tahoe Family Resource Center to facilitate dialogue with the affected community. Section 3.4, “Community Impacts,” includes analysis of the environmental justice effects of the project on pages 3.4-60 through 3.4-65. This analysis recognizes the project’s adverse effects on the minority and low-income population in the Rocky Point neighborhood concluding, “In spite of the project’s benefits, other measures included in the project to minimize adverse effects, and additional planning efforts to identify alternatives that would eliminate or reduce impacts, the preliminary determination... is that the project would still have a disproportionately high and adverse effect on minority and low-income populations in the Rocky Point neighborhood” (page 3.4-65). Outreach to the affected community will continue to be conducted as part of the decision-making process for the project. The commenter offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.
- 13-7 The commenter questions who will pay for relocated utilities. The South Tahoe Public Utility District (STPUD) expressed similar concerns related to the costs associated with the project’s impacts on utility infrastructure. See Response to Comments 9-2, 9-3, 9-6, 9-7, and 9-8.

- 13-8      The commenter is concerned that eminent domain may be used if affected property owners are unwilling to sell their property. The commenter also reiterates comments discussed earlier in the letter and expresses support for Alternative A, the no build alternative. As stated in TTD's guiding principles for the development and implementation of the project (TTD 2016), which are referenced in the Draft EIR/EIS/EIS, "The acquisition process will be conducted in a manner consistent with the requirements of the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 ("Uniform Act"). TTD's priority in the process will be to seek acquisition based on a willing-seller basis. Any use of eminent domain by the District would only be if necessary to complete the needed right-of-way and also be consistent with provisions of the Uniform Act." The commenter offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided. This comment and the commenter's preference for Alternative A are noted for consideration by decision makers.

LAW OFFICES

FELDMAN McLAUGHLIN THIEL LLP

Letter  
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Lewis S. Feldman  
Michael J. McLaughlin  
Kara L. Thiel

Licensed in California and Nevada

178 U.S. Highway 50, Suite B  
P.O. Box 1309, Zephyr Cove, NV 89448  
Telephone: 775.580.7431 Facsimile: 775.580.7436

Website: [finttahoe.com](http://finttahoe.com)  
Email: [lew@finttahoe.com](mailto:lew@finttahoe.com)

July 7, 2017

Mr. Jim Lawrence, Chair  
Via Email: [lawrence@dcnr.nv.gov](mailto:lawrence@dcnr.nv.gov)  
Mr. Bill Yeates, Vice Chair  
Via Email: [jwytrpa@gmail.com](mailto:jwytrpa@gmail.com)  
Tahoe Regional Planning Agency  
P.O. Box 5310  
Stateline, NV 89449

Tahoe Transportation District  
Attn: Russ Nygaard, Transportation Capital  
Via Email: [info@tahoetransportation.org](mailto:info@tahoetransportation.org)  
P.O. Box 499  
Zephyr Cove, NV 89448

Federal Highway Administration  
Attn: Scott McHenry  
Via Email: [Scott.McHenry@dot.gov](mailto:Scott.McHenry@dot.gov)  
650 Capitol Mall, Suite 4-100  
Sacramento, CA 95814

Re: Comments Concerning the US 50/South Shore Community  
Revitalization Project Draft EIR/EIS/EIS

Gentlemen:

This office is counsel to the South Tahoe Alliance of Resorts ("STAR"), which includes the Lake Tahoe Resort Hotel, Heavenly Mountain Resort, Harrah's Lake Tahoe Hotel, Harveys Lake Tahoe Hotel, Hard Rock Hotel Lake Tahoe, MontBleu Resort, The Edgewood Companies, and Lakeside Inn. STAR appreciates the opportunity to comment on the in-depth environmental analysis concerning the above-described Project and range of alternatives. STAR submits for your consideration the following:

STAR has been monitoring the evolution of this Project since initial scoping and is pleased to support the Locally Preferred Action, "Alternative B". STAR submits the re-routing of US Highway 50 along the existing Montreal Road and Lake Parkway, coupled with the narrowing of the existing Highway 50 to a Main Street will positively impact water quality, air quality, scenic quality, noise, level of service, and create a platform to integrate pedestrian scale improvements throughout the tourist core and enhance multi-modal mobility.

STAR is supportive of and compliments the Tahoe Transportation District Board for their commitment to private replacement housing prior to relocation of displaced residents.

The environmental review demonstrates a clear preponderance of beneficial environmental impacts resulting from project implementation.

Finally, STAR respectfully submits that neither Alternative A nor Alternative E meets the Project Purpose, Needs and Objectives, whereas Alternatives C and D do not align with the Project Purpose, Needs and Objectives as well as Alternative B. The Locally Preferred Action, Alternative B, is consistent with the Tahoe Regional Planning Compact, the updated

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FELDMAN McLAUGHLIN THIEL LLP

TRPA Governing Board  
 Tahoe Transportation District  
 Federal Highway Administration  
 Page 2  
 July 7, 2017

Regional Plan, the South Shore Area Plan, the Tourist Core Area Plan, and the City of South Lake Tahoe's General Plan. STAR respectfully submits the beneficial impacts of the Project, including but not limited to, new quality workforce housing, improved multi-modal circulation, reduced traffic volumes and noise through the tourist core, the construction of a landscaped parkway, and the diversion of large trucks and through traffic around the core will result in a transformative change for the work force, visitors, and the economy.

14-1  
 cont.

Thank you for your consideration of the foregoing.

Sincerely,

FELDMAN McLAUGHLIN THIEL LLP

By:

Lewis S. Feldman

LSF/jps

cc: South Tahoe Alliance of Resorts

**Letter  
 14**

**South Tahoe Alliance of Resorts**  
 July 7, 2017

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The commenter recognizes the beneficial effects of the project, supports TTD's commitment to provide replacement housing, and expresses support for Alternative B. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the project.

**TAHOE MEADOWS**  
Historic District

Letter  
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July 3, 2017

Contact: Cathi Sweeney  
3830 Meadow Road  
South Lake Tahoe, CA 96150  
[cathi.sweeney@gmail.com](mailto:cathi.sweeney@gmail.com)  
510 842-7042

Tahoe Transportation District  
c/o Russ Nygaard  
TTD Program Manager  
PO Box 499  
Zephyr Cove, NV 89448  
[info@tahoetransportation.org](mailto:info@tahoetransportation.org)

Dear Sirs,

Attached are comments on the US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS from Tahoe Meadows Association.

We appreciate the effort made by Mr. Hasty and Wood Rogers after the publication of the Draft EIR/EIS/EIS to address some of our concerns about the project. Their later drawings illustrate that mitigation of our issues with access at the Hwy 50/Lake Road intersection is feasible. However, these later drawings are not part of the Draft EIR/EIS/EIS and were not part of the environmental analysis performed for the US 50 project. Therefore, we must comment on the document as published.

15-1

Tahoe Meadows Board of Directors  
Ron Yank, President  
Richard Haynes  
Stephanie Mel  
Michael Ross  
Scott Sanford  
Craig Southwick  
Cathi Sweeney

Tahoe Meadows Comments US 50/South Shore Community Revitalization Project  
Draft EIR/EIS/EIS

## TAHOE MEADOWS Historic District

### COMMENTS US 50/SOUTH SHORE COMMUNITY REVITALIZATION PROJECT DRAFT EIR/EIS/EIS

#### GENERAL COMMENTS ON THE DRAFT EIR/EIS/EIS

Tahoe Meadows generally supports the redesign of Hwy 50 to alleviate traffic congestion and create a local road through the casino core. Tahoe Meadows residents and their guests experience first-hand summer back-up conditions right outside the only neighborhood entry point at Hwy 50/Lake Road.

However, this draft EIR/EIS/EIS fails to consider the safety of Tahoe Meadows residents and guests, Linear Park bicyclists and pedestrians, and the public at large by failing to identify, analyze and design solutions to the newly created hazards at the intersection of Hwy 50/Lake Road. In addition, uninterrupted Emergency Vehicle Access at Hwy 50/Lodge Road is not preserved.

#### **Background of Tahoe Meadows Involvement in Public Input**

Access to Tahoe Meadows was not identified as a potential impact during the initial scoping period (2011) because the Notice of Preparation/Notice of Intent did not provide sufficient details for Tahoe Meadows to imagine that access at the Hwy 50/Lake Road intersection and at the Hwy 50/Lodge Road Emergency Vehicle Access gate might be changed in any way. The Notice of Preparation/Notice of Intent description and illustration were too rudimentary to predict that access to the Tahoe Meadows neighborhood might be an issue. Staff at the public scoping sessions stated that no change to Tahoe Meadows access was anticipated.

As the engineering on the alternatives progressed, beginning in 2012 Tahoe Meadows identified and brought to TTD staff's attention the issues of access at Hwy 50/Lake Road (potential loss of left in/left out turns) and the Hwy 50/Lodge Road Emergency Vehicle Access.

These access issues have been raised by Tahoe Meadows homeowners in emails, public meetings and workshops, and the Citizen's Review Committee meetings – as often as possible since 2012.

Tahoe Meadows homeowners have been repeatedly assured by project staff that these access issues are known to them, that the access issue was raised with the appropriate consultants and that the left in/left out turns at Hwy 50/Lake Road would be maintained.

It is clear from review of the draft EIR/EIS/EIS documents that the access issue information has been completely ignored by project staff and consultants in the preparation of the alternative designs presented in this draft EIR/EIS/EIS.

Tahoe Meadows has 96 homes. There are full-time residents, short term rental properties in use throughout the year and a number of seasonally occupied homes. There is only one point of entry to Tahoe Meadows: the gate at Hwy 50/Lake Road.

Tahoe Meadows Comments US 50/South Shore Community Revitalization Project  
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## TAHOE MEADOWS

### Historic District

There are Emergency Vehicle Access gates at Hwy 50/Lodge Road and at Hwy 50/Wildwood Ave. as required by South Lake Tahoe Fire Dept. These are not used for resident vehicle access. There are two additional pedestrian-only gates but neither can accommodate any type of vehicle. Fire evacuation of the 96 homes will require use of all egress points.

15-2  
cont.

Vehicles entering and exiting Tahoe Meadows at Hwy 50/Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.

The summer months are the months with the highest number of residents and guests. The Tahoe Meadows gate log shows that the entry gate opened 7,338 times in July 2013, not including the heaviest traffic day - July 4<sup>th</sup> - when the gate was locked open so no entry count was made. *The actual entry vehicle count would be much higher* because more than one vehicle often enters on each gate opening cycle during busy periods. And, obviously, the number of vehicle trips is doubled because *the counted number is only the entry gate operation; an equal number of vehicles also exit* producing well in excess of 15,000 vehicle trips in July 2013 at this intersection. Since that time, with the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.

15-3

The July 2013 Tahoe Meadows' Hwy 50/Lake Road gate entry information was submitted in September 2013 as part of a Community Review Committee written comment pointing out the need to actively address the left in/left out access issue.

In a December 12, 2014 email the project manager, Alfred Knotts, said,

**"I wanted to let you know I did follow up with our Design Engineer and he has assured me that we can get a two way left in front of Tahoe Meadows so it will essentially mimic what is occurring today."**

In September 2015, when we learned Mr. Knotts was no longer on the project, we reiterated our concerns to the current project manager, Russell Nygaard.

At the April 27, 2017 open house event, Tahoe Meadows homeowners continued to be told by project staff that left in/left out turns at Hwy 50/Lake Road would be retained. That is not reflected in the data, analysis and designs presented in the draft EIR/EIS/EIS.

Creating traffic back-ups and significant hazards for vehicles, bicyclists and pedestrians at Hwy 50/Lake Road is not acceptable.

Loss of continuous emergency vehicle / evacuation access at Hwy 50/Lake Road is not acceptable.

15-4

#### Summary of Tahoe Meadows Issues

Tahoe Meadows Comments US 50/South Shore Community Revitalization Project  
Draft EIR/EIS/EIS

Page 2

## TAHOE MEADOWS

### Historic District

**The draft EIR/EIS/EIS is inadequate** because it fails to analyze, include in project alternative designs, or identify solutions for the following issues:

#### **1. Impacts of Changing Tahoe Meadows Access at Hwy 50/Lake Road**

The neighborhood impact analysis and traffic studies and analysis in this draft EIR/EIS/EIS are inadequate because they fail to include the proposed change in access to Tahoe Meadows to eliminate left in/left out turns under proposed Alternatives B, C (including EIR/EIS/EIS mitigation measures) and D.

The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.

There is no analysis of this significant change in neighborhood access. Alternatives B, C (including mitigation measures) and D as currently shown in the draft EIR/EIS/EIS exhibits clearly impact the neighborhood's access at Hwy 50/Lake Road by reconfiguring Hwy 50 to eliminate the left in/left out turning motions for thousands of vehicle trips per year.

With no left turns permitted at Hwy 50/Lake Road, vehicles will be required to make U-turns to continue in the desired direction. Those U-turns could occur at the signals at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. or they could occur mid-block from the center lane between Hwy 50/Lake Road and Hwy 50/Wildwood which is a dangerous situation. Hundreds of additional summer peak average day vehicle trips will have to make U-turns. Since U-turns at signaled intersections are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay. This would degrade the Level of Service (LOS) at both intersections and increase the Vehicle Miles Traveled (both individually and for the project as a whole) under Alternatives B, C (including EIR/EIS/EIS mitigation measures) and D.

It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.

Removing the left turn queuing area (existing center lane) and requiring all vehicles entering Tahoe Meadows to travel west on Hwy 50 to make a right entry turn will create a back-up in the travel lane while vehicles wait for the cars ahead of them to use the keypad to open the Tahoe Meadows gate. This will adversely impact road segment operations and create a significant safety hazard: higher potential for rear-end collisions due to stopped vehicles in the travel lane.

That situation is further exacerbated by the proposal to narrow the Linear Park at this critical intersection forcing trucks or vehicles with trailers to block the shared

Tahoe Meadows Comments US 50/South Shore Community Revitalization Project  
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15-4  
cont.

15-5

## TAHOE MEADOWS

### Historic District

bicycle/pedestrian path while using the gate keypad. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians.

15-5  
cont.

The significant changes to the intersection of Hwy 50/Lake Road and adverse impacts to study area intersections (including Hwy 50/Lake Road itself) and road segments that result from the changes are not addressed in the analysis of the alternatives' impact on neighborhoods or in the analysis of the alternatives' impact on traffic & transportation.

15-6

These impacts need to be analyzed and a solution identified that maintains left in/left out access at Hwy 50/Lake Road.

#### **2. Reduction of the Width of the Linear Park at Hwy 50/Lake Road**

The draft EIR/EIS/EIS is inadequate because it fails to identify, analyze and mitigate the creation of safety hazards for vehicles, bicyclists and pedestrians at the intersection of Hwy 50/Lake Road due to narrowing the Linear Park at this intersection.

The current Linear Park profile allows one entering vehicle using the entry gate keypad and one additional vehicle behind to stop out of the westbound Hwy 50 traffic lane with space between for the full width of the shared path. Exiting vehicles have space to wait for a break in oncoming traffic without blocking the shared path.

Redesign of the Linear Park to drastically reduce the park profile at Hwy 50/Lake Road as shown in Appendix N under proposed Alternatives B, C and D creates significant safety hazards for vehicles, bicyclists and pedestrians.

Vehicles must stop to use the keypad to open the Tahoe Meadows gate. By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), the following new hazards are created:

15-7

- Trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane, adding risk of collisions.
- All vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic.
- This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.

When a vehicle is stopped at the keypad, additional traffic entering Tahoe Meadows will have to queue in the westbound travel lane of Hwy 50 to wait for the vehicle ahead to clear the gate. Narrowing the Linear Park at Hwy 50/Lake Road creates a significant traffic safety hazard for rear-end collisions on Hwy 50.

## TAHOE MEADOWS

### Historic District

Vehicles trying to quickly get out of the fast-moving Hwy 50 westbound travel lane may choose to block the Linear Park shared path to avoid being rear-ended. This creates the safety hazard of dangerous interactions with pedestrians and bicyclists using the Linear Park shared path. As shown in Appendix N, vehicles entering Tahoe Meadows will have no space between the road and the shared path to pause for path users.

The volume of daily vehicle trips generated by the Tahoe Meadows neighborhood makes the creation of new traffic hazards for pedestrians, bicyclists and vehicles at Hwy 50/Lake Road unacceptable.

The proposed changes to the Linear Park create significant safety issues at Hwy 50/Lake Road. Full analysis of the impacts in the EIR/EIS/EIS and redesign of the proposed Alternatives is necessary.

#### **3. Combined Impacts of Changes to the Hwy 50/Lake Road Intersection and Redesign of the Linear Park**

The draft EIR/EIS/EIS is inadequate because it fails to identify and analyze the compounding of impacts at Hwy 50/Lake Road with the narrowing of the Linear Park at that location.

The combined adverse impacts to recreational user safety and experience, community quality of life and adjacent road intersection and road segment operations that result from these combined changes are not addressed in the draft EIR/EIS/EIS analysis of the alternatives' impact on neighborhoods, recreational facilities and traffic & transportation.

The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

#### **4. Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road**

The draft EIR/EIS/EIS is inadequate because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.

Exhibit 2.2 (Alternative B) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.

Exhibit 2.3 (Alternative C) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.

Exhibits 2-4 and 2-11 (Alternative D) show access provided to the Holiday Inn Express, but no Emergency Vehicle Access at Hwy 50/Lodge Road.

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cont.

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## TAHOE MEADOWS Historic District

The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.

Tahoe Meadows has extremely limited access for emergency vehicles: one vehicle entry point at Hwy 50/Lake Road and two Emergency Vehicle Access points at Hwy 50/Wildwood Ave. and Hwy 50/Lodge Road. There are two additional pedestrian-only access gates but neither can accommodate any type of vehicle.

Fire evacuation of the 96 homes will require use of all egress routes.

Emergency Vehicle Access and neighborhood evacuation would be impaired by construction of a median of any height as part of the transportation improvements at the Hwy 50/Lake Road intersection.

The EIR/EIS/EIS must include measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

Emergency Vehicle Access at Hwy 50/Lodge Road must be continuously maintained without interruption throughout construction of any improvements (including construction staging activities), at opening in 2020, throughout construction of relocation housing near this location, and in the Horizon Year 2040.

15-8  
cont.

## COMMENTS ON SPECIFIC DRAFT EIR/EIS SECTIONS

### SUMMARY

#### S.2 PURPOSE, NEED, AND OBJECTIVES

##### Need

(page 31, S-5) *E. Neighborhood Traffic Operations* This section fails to describe the need to maintain safe access to the Tahoe Meadows neighborhood at Hwy 50/Lake Road.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- The access issue affects 96 homes with full-time residents, short term rental properties in use throughout the year and a number of seasonally occupied homes.
- The intersection of Hwy 50/Lake Road is the only vehicle entry point to Tahoe Meadows.
- Restricting Tahoe Meadows traffic to right in/right out access under proposed Alternatives B, C and D will increase congestion at Hwy 50/Pioneer Trail and

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Tahoe Meadows Comments US 50/South Shore Community Revitalization Project  
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## TAHOE MEADOWS

### Historic District

Hwy 50/Wildwood Avenue due to hundreds of additional summer peak average day U-turns required to replace the lost left turn patterns.

- Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- Removing the left turn queuing area (existing center lane) and requiring all vehicles entering Tahoe Meadows to travel west on Hwy 50 to make a right entry turn will create a back-up in the westbound Hwy 50 travel lane while vehicles wait for the cars ahead of them to use the keypad to open the Tahoe Meadows gate. This will adversely impact road segment operations and create a safety hazard: higher potential for rear-end collisions due to stopped vehicles in the travel lane.
- Redesign of the Linear Park at Hwy 50/Lake Road as shown in Appendix N under proposed Alternatives B, C and D will further increase congestion on the westbound Hwy 50 road segment operations east of Hwy 50/Lake Road as there will be no space for vehicles to wait out of the travel lane.
- These changes will adversely impact the Tahoe Meadows neighborhood traffic operations.

15-10  
cont.

### Project Objectives

(page 31, S-5) first listed objective: *reduce overall vehicle delays through improved motor vehicle mobility on the state highway system, including for commercial access and a better resident and visitor experience;*

- Safe access to Tahoe Meadows at Hwy 50/Lake Road needs to be included in the EIR/EIS/EIS analysis under this objective.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Restricting Tahoe Meadows traffic to right in/right out access as illustrated in Exhibits for Alternatives B, C (including mitigation measures) and D will increase overall vehicle delays at Hwy 50/Lake Road, Hwy 50/Wildwood Ave. and Hwy 50/Pioneer Trail.
- Loss of the left in/left out turn motions will force hundreds of additional summer peak average day vehicles to make U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to replace the lost left turn patterns.

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- Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay.
- Added delay and longer queuing for the left turn at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. would degrade the LOS at both intersections under Alternatives B, C (including mitigation measures) and D.
- Vehicles entering Tahoe Meadows with right in only access would have to queue in the westbound travel lane of Hwy 50 to wait for cars ahead to use the Tahoe Meadows gate keypad. This is dangerous and will result in degraded LOS for the Hwy 50 road segment east of the Hwy 50/Lake Road intersection.
- These access changes will adversely impact the Tahoe Meadows resident and visitor experience.

15-12  
cont.

### S.4 ISSUES SUBJECT TO PUBLIC CONTROVERSY

#### Community Impacts

(page 36, S-10) Severely degraded access to the Tahoe Meadows neighborhood at Hwy 50/Lake Road should be included as an identified community impact.

- The proposed changes to the intersection of Hwy 50/Lake Road affect the quality of life for Tahoe Meadows neighborhood residents and guests as well as bicyclists and pedestrians using the Linear Park in front of Tahoe Meadows.
- Alternatives B, C (including mitigation measures) and D as currently shown in the draft EIR/EIS/EIS exhibits clearly impact the neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- Hundreds of summer peak average day Tahoe Meadows vehicles would be required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.

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- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- Hundreds of summer peak average day Tahoe Meadows vehicles would be required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- Hundreds of additional summer peak average day right turns into Tahoe Meadows on the westbound road segment between Hwy 50/Pioneer Trail and Hwy 50/Lake Road would degrade the road segment operation and create hazardous conditions:
- The requirement to access Tahoe Meadows only by right turn will cause stopped traffic queuing in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to open the Tahoe Meadows gate.
- This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- These changes to the intersection of Hwy 50/Lake Road will impact the broader community by degrading intersection operations and creating hazardous conditions on Hwy 50 and in the Linear Park.

15-14  
cont.

### Impacts on Parks and Trails

(page 37, S-11) The description of changes to the Linear Park fails to include the information that the drastic reduction in the profile of the shared bicycle & pedestrian path at Hwy 50/Lake Road (as shown in Appendix N) creates new significant hazards for vehicles, bicyclists and pedestrians.

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- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- The redesign of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- The description of changes to the Linear Park fails to highlight that proposed reduction in the Linear Park profile as shown in Appendix N would significantly degrade the user experience in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
  - Routing the shared path too close to the fence would create a hazard for bicycle riders and pedestrians. The Tahoe Meadows fence is a metal picket fence so if a rider clips the fence, the handle bars may hang up between the pickets and cause a nasty crash.
  - Riding close to a fence is an uncomfortable riding experience which sends the rider into the center of the shared path. Riding in the center of the path is hazardous to pedestrians and oncoming bicyclists.
- Reducing the separation between the path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user, the user experience and the recreational value of the Linear Park.
- Reducing the separation between the path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of the recreational user, the user experience and the recreational value of the Linear Park.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

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cont.

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#### Multi-Modal Improvements

(page 38, S-12) *One of TTD's basic project objectives includes improving connectivity, reliability, travel times, and operations of public transportation modes, including increased mobility and safety for bicycles and pedestrians and enhanced public access to Van Sickle Bi-State Park via the new pedestrian bridge.*

- Drastically reducing the profile of the Linear Park at Hwy 50/Lake Road as shown in Appendix N will create potential hazards for bicyclists and pedestrians.
  - Trucks and vehicles with trailers stopping to operate the Tahoe Meadows entry gate keypad and all vehicles exiting the neighborhood will block the shared path. Many will extend into Hwy 50.
- The redesign of the Linear Park as shown in Appendix N directly contradicts the stated objective to increase safety and should be described in this section.

15-16

### S.5 SUMMARY OF IMPACTS AND MITIGATION

#### 3.3 Parks and Recreational Facilities

##### Impact 3.3-4: Changes to the quality of recreation user experience

##### *Resource Topics/Impacts*

(page 45, S-19) *Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion **The effects of Alternatives B, C, and D transportation improvements on the quality of recreation user experience at the Linear Park and Edgewood Companies mountain parcel would not be substantial because recreation user experience at these facilities is currently influenced by similar vehicle traffic on adjacent US 50 and Lake Parkway and the user experience would be similar to existing conditions** cannot be made.*

15-17

- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards to Linear Park users at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break

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in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.

- The redesign of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade bicycle/pedestrian user safety within the Linear Park in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
  - Routing the shared path too close to the fence would create a hazard for bicycle riders and pedestrians. The Tahoe Meadows fence is a metal picket fence so if a rider clips the fence, the handle bars may hang up between the pickets and cause a nasty crash.
  - Riding close to a fence is an uncomfortable riding experience which sends the rider into the center of the shared path. Riding in the center of the path is hazardous to pedestrians and oncoming bicyclists.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- Reducing the separation between the Linear Park shared path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 45, S-19) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *The design features of Alternatives B, C, D, and Alternative E would avoid or minimize the change in the quality of recreation user experience environmental consequences such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

(page 45, S-19) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *Alts B, C, D = LTS (Less than Significant)* cannot be made.

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cont.

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- Changes to the Linear Park profile as shown in Appendix N create Significant impacts on the Linear Park user experience.
- Drastic reduction in the profile of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) creates new significant hazards for vehicles, bicyclists and pedestrians.
- Drastic reduction in the Linear Park profile as shown in Appendix N would significantly degrade the user experience in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- Reducing the separation between the path and Hwy 50 would adversely affect the safety of the recreational user, the user experience and the recreational value of the Linear Park.
- Reducing the separation between the path and the Tahoe Meadows fence would adversely affect the safety of the recreational user, the user experience and the recreational value of the Linear Park.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.
- The impact is Significant.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

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cont.

#### ***Avoidance, Minimization, and/or Mitigation Measures***

(page 45, S-19) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA* cannot be made.

15-18

- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### **3.4 Community Impacts**

(page 46, S-20) An impact statement is needed to address the proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D.

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- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.

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- The proposed changes to the intersection of Hwy 50/Lake Road affect the quality of life for Tahoe Meadows neighborhood residents and guests as well as bicyclists and pedestrians using the Linear Park in front of Tahoe Meadows.
- Alternatives B, C (including mitigation measures) and D as currently shown in the draft EIR/EIS/EIS exhibits clearly impact the neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- Hundreds of summer peak average day Tahoe Meadows vehicles would be required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- Hundreds of summer peak average day Tahoe Meadows vehicles would be required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- Hundreds of additional summer peak average day right turns into Tahoe Meadows on the westbound road segment between Hwy 50/Pioneer Trail and Hwy 50/Lake Road would degrade the road segment operation and create hazardous conditions:
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to open the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane, adding

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cont.

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risk of collisions. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.

- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- These changes to the intersection of Hwy 50/Lake Road will impact the broader community by degrading intersection operations and creating hazardous conditions on Hwy 50 and in the Linear Park.

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cont.

### 3.6 Traffic and Transportation

#### Impact 3.6-2 Impacts of transportation improvements on intersection operations – 2020 (Opening Day)

##### *Resource Topics/Impacts*

(page 57 S-31) The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.

- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.

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- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of additional summer peak average day right turns into Tahoe Meadows on the westbound Hwy 50 road segment between Hwy 50/Pioneer Trail and Hwy 50/Lake Road.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane, adding risk of collisions. This reduction creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

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cont.

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- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.at Hwy 50/Lake Road must be included.

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cont.

#### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 57 S-31) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *the design features of Alternatives A, B, D, and E would avoid or minimize the impacts on intersection operations in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

(page 57 S-31) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alts B, D, E = B (Beneficial) Alt C = S (Significant)* cannot be made.

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- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.
- The adverse impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The adverse impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection to accommodate the widening of Hwy 50 as shown in Appendix N under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified combined impact of these changes at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The draft EIR/EIS/EIS fails to identify solutions and mitigations for these adverse impacts.
- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- Maintaining the left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.at Hwy 50/Lake Road must be included.

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#### ***Avoidance, Minimization, and/or Mitigation Measures***

(page 57 S-31) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA* cannot be made.

- Maintaining the left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

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#### **Impact 3.6-3: Impacts on roadway segment operations – 2020 (Opening Day)**

##### ***Resource Topics/Impacts***

(page 58, S-32) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Under the opening day conditions, Alternatives B, D, and E would result in acceptable roadway segment LOS during annual average and summer peak hours* cannot be made.

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.
- The proposed changes adversely affect the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail as well as the safety of vehicles, bicyclists, and pedestrians at the intersection of Hwy 50/Lake Road.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation

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measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.

- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 58, S-32) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *the design features of Alternatives A, B, D, and E would avoid or minimize the impacts on roadway*

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cont.

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*segment operations in 2020 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

(page 58, S-32) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alt A, B, D = LTS* (Less than Significant) ... *Alt C = S* (Significant) cannot be made.

- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### ***Avoidance, Minimization, and/or Mitigation Measures***

(page 58, S-32) The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.

- The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while

15-28  
cont.

15-29

15-30

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vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.

- This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

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cont.

15-31

#### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)***

(page 58, S-32) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Alts A, B, D, E = NA* (Not Applicable); *Alt C = Mitigation Measure 3.6-3 has been incorporated into Alternative C, but there are no other feasible mitigation, avoidance, or minimization measures that could further reduce to the extent feasible the environmental consequences related to impact on roadway segment operations* cannot be made.

15-32

AND

(page 58, S-32) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alt A, B, D = LTS* (Less than Significant) cannot be made.

- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.

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- This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-32  
cont.

15-33

### Impact 3.6-4: Impacts on vehicle miles of travel – 2020 (Opening Day)

#### *Resource Topics/Impacts*

(page 59, S-33) The impact on VMT of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D is not identified.

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed change in access to Tahoe Meadows at Hwy 50/Lake Road under proposed Alternatives B, C (including mitigation measures) and D.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
  - Information about the number of vehicle trips at Hwy 50/Lake Road was made available to the project team in 2013 yet the study fails to include the loss of the left in/left out turning motions at Hwy 50/Lake Road for the Tahoe Meadows neighborhood of 96 homes.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits eliminate left in/left out turns at Hwy 50/Lake Road for vehicles entering or leaving Tahoe Meadows.

15-34



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- Eliminating left in/left out access will result in hundreds of additional summer peak average day U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to accomplish the lost left in/left out turns.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible. This would greatly increase the VMT for trips to and from Tahoe Meadows.
- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.
- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

15-34  
cont.

#### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 59, S-33) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives A, B, C, D, and E would avoid or minimize the impacts on VMT in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

(page 59, S-33) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alts B, C, D = B (Beneficial)* cannot be made.

- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits eliminate left in/left out turns at Hwy 50/Lake Road for vehicles entering or leaving Tahoe Meadows.
  - Eliminating left in/left out access will result in hundreds of additional summer peak average day U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to accomplish the lost left in/left out turns.
- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.

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- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

#### ***Avoidance, Minimization, and/or Mitigation Measures***

(page 59, S-33) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA* cannot be made.

15-34  
cont.

- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

#### **Impact 3.6-5: Impacts on bicycle and pedestrian facilities – 2020 (Opening Day)**

##### ***Resource Topics/Impacts***

(page 60, S-34) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusions *Because of their design, Alternatives B, C, D, and E would not disrupt or interfere with existing or planned bicycle/pedestrian facilities; rather, they would enhance the existing infrastructure and create a bicycle and pedestrian network with enhanced connectivity. Furthermore, Alternatives B, C, D, and E would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems* cannot be made.

15-35

- Proposed changes to the Linear Park profile under Alternative B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards to Linear Park users at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending

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bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.

- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Proposed changes to the Linear Park profile under Alternative B, C (including mitigation measures) and D as shown in Appendix N to accommodate widening of Hwy 50 would significantly degrade bicycle/pedestrian user safety within the Linear Park in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- Reducing the separation between the Linear Park shared path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

15-35  
cont.

### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 60, S-34) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *The design features of Alternatives B, C, D, and E would avoid or minimize the impacts on bicycle and pedestrian facilities in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

(page 60, S-34) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *Alts B, C, D, E = B (Beneficial)* cannot be made.

- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.

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- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining these changes at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection.
- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-35  
cont.

### ***Avoidance, Minimization, and/or Mitigation Measures***

(page 60, S-34) Without analysis of the impact of intersection changes at Hwy 50/Lake Road, the conclusion *No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA* cannot be made.

15-36

- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

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- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

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cont.

#### **Impact 3.6-8: Impacts on vehicular, bicycle, and pedestrian safety – 2020 (Opening Day)**

##### ***Resource Topics/Impacts***

(page 62, S-36) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *Alternatives B, C, D, and E would enhance the existing infrastructure and improve safety throughout the vehicular, bicycle, and pedestrian network within the study area* cannot be made.

- Proposed changes to the Linear Park profile under Alternative B, C (including mitigation measures) and D as shown in Appendix N to accommodate the widening of Hwy 50 would create significant safety hazards to Linear Park users at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Proposed changes to the Linear Park profile under Alternative B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade bicycle/pedestrian user safety within the Linear Park in areas where buffers are reduced below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.

15-37



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- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 62, S-36) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *The design features of Alternatives B, C, D, and E would avoid or minimize the impacts on vehicular, bicycle, and pedestrian safety in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

(page 62, S-36) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alts B, C, D, E = B (Beneficial)* cannot be made.

- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.
- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N under alternatives B, C (including mitigation measures) and D to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection.
- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.

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- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.at Hwy 50/Lake Road must be included.
- The impact is Significant.

#### **Avoidance, Minimization, and/or Mitigation Measures**

(page 62, S-36) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA cannot be made.*

- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.at Hwy 50/Lake Road must be included.

#### **Impact 3.6-9: Impacts on emergency access – 2020 (Opening Day)**

##### **Resource Topics/Impacts**

(page 63, S-37) The statement fails to include potential impacts on emergency access to the Tahoe Meadows neighborhood.

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
  - Not only will the emergency access at Hwy 50/Lodge Road be required at opening in 2020, but must be maintained throughout construction of any improvements (including construction staging activities) and construction of relocation housing near this location.
  - Exhibit 2.2 (Alternative B) shows a large construction staging area directly in front of the Emergency Vehicle Access ay Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.
  - Exhibit 2.3 (Alternative C) shows a large construction staging area directly in front of the Emergency Vehicle Access ay Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.
  - Exhibits 2-4 and 2-11 (Alternative D) show access provided to the Holiday Inn Express, but no Emergency Vehicle Access at Hwy 50/Lodge Road.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.

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- Tahoe Meadows has extremely limited access for emergency vehicles: one vehicle entry point at Hwy 50/Lake Road and two Emergency Vehicle Access points at Hwy 50/Wildwood Ave. and Hwy 50/Lodge Road. There are two additional pedestrian-only access gates but neither can accommodate any type of vehicle.
- Fire evacuation of the 96 homes will require use of all egress routes.
- Emergency Vehicle Access and neighborhood evacuation would be impaired by construction of a median of any height as part of the transportation improvements at the Hwy 50/Lake Road intersection.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 63, S-37) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *The design features of Alternatives A, B, D, and E would avoid or minimize the impacts on emergency access in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

(page 63, S-37) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Alts A, B, D, E = LTS (Less than Significant)* cannot be made.

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles.
- Fire evacuation of the 96 homes will require use of all egress routes.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

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cont.

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#### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)***

(page 63, S-37) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Alts A, B, D, E = NA; Alt C = Mitigation Measure 3.6-9 has been incorporated into Alternative C, but there are no other feasible mitigation, avoidance, or minimization measures that could further reduce to the extent feasible the environmental consequences related to emergency access in 2020* cannot be made.

AND

(page 63, S-37) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Alts A, B, D, E = LTS (Less than Significant)* cannot be made.

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles.
- Fire evacuation of the 96 homes will require use of all egress routes.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

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cont.

#### **Impact 3.6-12: Impacts on intersection operations – 2040 (Horizon Year)**

##### ***Resource Topics/Impacts***

(page 66, S-40) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Under 2040 horizon year conditions, improvements under Alternatives B and D transportation improvements and mixed use development, including replacement housing, would operate intersections at annual average and summer peak hour LOS C or better* cannot be made.

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.

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- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of additional summer peak average day right turns into Tahoe Meadows on the westbound Hwy 50 road segment between Hwy 50/Pioneer Trail and Hwy/50 Lake Road.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.

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cont.

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- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-40  
cont.

15-41

#### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 66, S-40) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *The design features of Alternatives B, D, and E would avoid or minimize the effects on intersection operations in 2040 such that no additional mitigation measures are needed or feasible to implement; Mitigation Measure 3.6-12 has been incorporated into Alternative C to further reduce to the extent feasible the environmental consequences related to impacts on intersection operations in 2040* cannot be made.

AND

15-42

(page 66, S-40) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Alts B, D, E = LTS (Less than Significant) and Alt C = S (Significant)* cannot be made.

- The adverse impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The adverse impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection to accommodate the widening of Hwy 50 as shown in Appendix N under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.

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- The draft EIR/EIS/EIS fails to consider the intensified combined impact of these changes at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The draft EIR/EIS/EIS fails to identify solutions and mitigations for these adverse impacts.
- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- Maintaining the left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.at Hwy 50/Lake Road must be included.

15-42  
cont.

### ***Avoidance, Minimization, and/or Mitigation Measures***

- Maintaining the left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.at Hwy 50/Lake Road must be included.

15-43

### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)***

(page 66, S-40) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Alts B, C, D, E = NA* (Not Applicable) and *Alt C = No additional mitigation measures would be needed or are feasible to implement* cannot be made.

AND

(page 66, S-40) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Alts B, C, D, E = LTS* (Less than Significant) cannot be made.

- Mitigation 3.6-12 does not address the combined impacts at the Hwy 50/Lake Road intersection.
- Maintaining the left in/left out turns at Hwy 50/Lake Road is feasible.

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- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-43  
cont.

#### **Impact 3.6-13: Impacts on roadway segment operations – 2040 (Horizon Year)**

##### ***Resource Topics/Impacts***

(page 67, S-41) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Under 2040 horizon year conditions, Alternatives B and D transportation improvements and mixed-use development, including replacement housing, and Alternative E would result in acceptable roadway segment LOS during annual average and summer peak hours cannot be made.*

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.
- The proposed changes adversely affect the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail as well as the safety of vehicles, bicyclists, and pedestrians at the intersection of Hwy 50/Lake Road.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows

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## TAHOE MEADOWS

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entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.

- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-44  
cont.

15-45

#### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 67, S-41) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives B, D, and E would avoid or minimize the environmental consequences related to roadway segment operations in 2040; Mitigation Measure 3.6-13 has been incorporated into Alternative C to further reduce to the extent feasible the environmental consequences related to roadway segment operations in 2040* cannot be made

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AND

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(page 67, S-41) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Alts B, D, E = LTS* (Less than Significant) and *Alt C = S* (significant) cannot be made.

- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### **Avoidance, Minimization, and/or Mitigation Measures (page 67, S-41)**

- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)

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cont.

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- The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
- Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-48  
cont.

15-49

***Environmental Consequences (NEPA)/Impact Determinations (CEQA, TRPA)  
after Mitigation (by Alternative)***

(page 67, S-41) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Alts B, D, E = NA; Alt C = Mitigation Measure 3.6-13 has been incorporated into Alternative C, but there are no other feasible mitigation, avoidance, or minimization measures that could further reduce to the extent feasible the environmental consequences related to roadway segment operations in 2040 cannot be made.*

AND

(page 67, S-41) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alts B, D, E = LTS (Less than Significant) cannot be made.*

15-50

- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)

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- The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
- Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-50  
cont.

15-51

#### **Impact 3.6-14: Impacts on vehicle miles of travel – 2040 (Horizon Year)**

##### ***Resource Topics/Impacts***

(page 67, S-41) The impact on VMT of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D is not identified.

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed change in access to Tahoe Meadows at Hwy 50/Lake Road under proposed Alternatives B, C (including mitigation measures) and D.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
  - Information about the number of vehicle trips at Hwy 50/Lake Road was made available to the project team in 2013 yet the study fails to include the loss of the left in/left out turning motions at Hwy 50/Lake Road for the Tahoe Meadows neighborhood of 96 homes.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits eliminate left in/left out turns at Hwy 50/Lake Road for vehicles entering or leaving Tahoe Meadows.
  - Eliminating left in/left out access will result in hundreds of additional summer peak average day U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to accomplish the lost left in/left out turns.
  - It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including

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mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible. This would greatly increase the VMT for trips to and from Tahoe Meadows.

- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.
- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

#### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 67, S-41) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *the design features of Alternatives A, B, C, D, and E would avoid or minimize the impacts on VMT in 2040 such that no additional mitigation measures are needed or feasible to implement* cannot be made

AND

(page 67, S-41) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alts B, C, D = B (Beneficial)* cannot be made.

- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits eliminate left in/left out turns at Hwy 50/Lake Road for vehicles entering or leaving Tahoe Meadows.
  - Eliminating left in/left out access will result in hundreds of additional summer peak average day U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to accomplish the lost left in/left out turns.
- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.
- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.

15-52  
cont.

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- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

### ***Avoidance, Minimization, and/or Mitigation Measures***

(page 67, S-41) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA* cannot be made.

15-52  
cont.

- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

### **Impact 3.6-15: Impacts on bicycle and pedestrian facilities – 2040 (Horizon Year)**

#### ***Resource Topics/Impacts***

(page 68, S-42) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *Because of their design, Alternatives B, C, D, and E would not disrupt or interfere with existing or planned bicycle/pedestrian facilities; rather, they would enhance the existing infrastructure and create a bicycle and pedestrian network with enhanced connectivity. Furthermore, Alternatives B, C, D, and E would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems* cannot be made.

15-53

- Proposed changes to the Linear Park profile under Alternative B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards to Linear Park users at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break

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in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.

- The redesign of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Proposed changes to the Linear Park profile under Alternative B, C (including mitigation measures) and D as shown in Appendix N to accommodate widening of Hwy 50 would significantly degrade bicycle/pedestrian user safety within the Linear Park in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- Reducing the separation between the Linear Park shared path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

15-53  
cont.

### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 68, S-42) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives B, C, D, and E would avoid or minimize the impacts on bicycle and pedestrian facilities in 2040 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

(page 68, S-42) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alts B, C, D, E = B (Beneficial)* cannot be made.

- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.
- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.

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- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining these changes at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection.
- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-53  
cont.

#### ***Avoidance, Minimization, and/or Mitigation Measures***

(page 68, S-42) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA* cannot be made.

15-54

- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### **Impact 3.6-18: Impacts on vehicular, bicycle, and pedestrian safety – 2040 (Horizon Year)**

##### ***Resource Topics/Impacts***

(page 70, S-44) Without analysis of the impact of intersection changes at Hwy 50/Lake Road, the statement *Alternatives B, C, D, and E would enhance the existing*

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*infrastructure and improve safety throughout the vehicular, bicycle, and pedestrian network within the study area cannot be made.*

- Proposed changes to the Linear Park profile under Alternative B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards to Linear Park users at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Proposed changes to the Linear Park profile under Alternative B, C (including mitigation measures) and D as shown in Appendix N to accommodate widening of Hwy 50 would significantly degrade bicycle/pedestrian user safety within the Linear Park in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- Reducing the separation between the Linear Park shared path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

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cont.

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### ***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 70, S-44) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives B, C, D, and E would avoid or minimize the impacts on vehicular, bicycle, and pedestrian safety in 2040* cannot be made.

AND

(page 70, S-44) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alts B, C, D, E = B (Beneficial)* cannot be made.

- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.
- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N under alternatives B, C (including mitigation measures) and D to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection.
- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.
- The impact is Significant.

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cont.

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#### **Avoidance, Minimization, and/or Mitigation Measures**

(page 70, S-44) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *No avoidance, minimization, or mitigation measures are required to reduce impacts such that no additional mitigation measures are needed or feasible to implement for the purposes of NEPA or to a less-than-significant level for the purposes of CEQA and TRPA* cannot be made.

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- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### **Impact 3.6-19: Impacts on emergency access – 2040 (Horizon Year)**

##### **Resource Topics/Impacts**

(page 70, S-44) The statement fails to include potential impacts on emergency access to the Tahoe Meadows neighborhood.

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
  - Not only will the emergency access at Hwy 50/Lodge Road be required at Horizon Year 2040, but must be maintained throughout construction of any improvements (including construction staging activities) and construction of relocation housing near this location.
  - Exhibit 2.2 (Alternative B) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.
  - Exhibit 2.3 (Alternative C) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.
  - Exhibits 2-4 and 2-11 (Alternative D) show access provided to the Holiday Inn Express, but no Emergency Vehicle Access at Hwy 50/Lodge Road.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles: one vehicle entry point at Hwy 50/Lake Road and two Emergency Vehicle Access points at Hwy 50/Wildwood Ave. and Hwy 50/Lodge Road. There are two

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additional pedestrian-only access gates but neither can accommodate any type of vehicle.

- Fire evacuation of the 96 homes will require use of all egress routes.
- Emergency Vehicle Access and neighborhood evacuation would be impaired by construction of a median of any height as part of the transportation improvements at the Hwy 50/Lake Road intersection.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

***Environmental Consequences (NEPA)/ Impact Determinations (CEQA, TRPA) before Mitigation***

(page 70, S-44) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *The design features of Alternatives B, D, and E would avoid or minimize the environmental consequences related to emergency access in 2040 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

(page 70, S-44) Without including uninterrupted emergency access to Tahoe Meadows, the conclusions *Alts B, D = LTS* (Less than Significant) *Alt E = B* and *Alt C = S* (Significant) cannot be made.

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles.
- Fire evacuation of the 96 homes will require use of all egress routes.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

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cont.

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#### ***Environmental Consequences (NEPA)/Impact Determinations (CEQA, TRPA) after Mitigation (by Alternative)***

(page 70, S-44) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Alts B, D, E = NA (Not Applicable)* and *Alt C = Mitigation Measure 3.6-19 has been incorporated into Alternative C, but there are no other feasible mitigation, avoidance, or minimization measures that could further reduce to the extent feasible the environmental consequences related to roadway segment operations in 2040* cannot be made.

AND

(page 70, S-44) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Alts B, D = LTS (Less than Significant)* and *Alt C = S (Significant)*

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles.
- Fire evacuation of the 96 homes will require use of all egress routes.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

15-57  
cont.

## 1 INTRODUCTION

### 1.3 PURPOSE, NEED, AND OBJECTIVES

#### 1.3.2 Need

(page 136, 1-8) *E. Neighborhood Traffic Operations* fails to describe the need to maintain safe access to Tahoe Meadows at Hwy 50/Lake Road.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- The access issue affects 96 homes with full-time residents, short term rental properties in use throughout the year and a number of seasonally occupied homes.

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- The intersection of Hwy 50/Lake Road is the only vehicle entry point to Tahoe Meadows.
- Restricting Tahoe Meadows traffic to right in/right out access under proposed Alternatives B, C and D will increase congestion at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Avenue due to hundreds of additional summer peak average day U-turns required to replace the lost left turn patterns.
- Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- Removing the left turn queuing area (existing center lane) and requiring all vehicles entering Tahoe Meadows to travel west on Hwy 50 to make a right entry turn will create a back-up in the westbound Hwy 50 travel lane while vehicles wait for the cars ahead of them to use the keypad to open the Tahoe Meadows gate. This will adversely impact road segment operations and create a safety hazard: higher potential for rear-end collisions due to stopped vehicles in the travel lane.
- Redesign of the Linear Park at Hwy 50/Lake Road as shown in Appendix N under proposed Alternatives B, C and D will further increase congestion on the westbound Hwy 50 road segment operations east of Hwy 50/Lake Road as there will be no space for vehicles to wait out of the travel lane.
- These changes will adversely impact the Tahoe Meadows neighborhood traffic operations.

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cont.

### 1.3.3 Project Objectives

(page 137, 1-9) first listed objective: *reduce overall vehicle delays through improved motor vehicle mobility on the state highway system, including for commercial access and a better resident and visitor experience;*

- Safe access to Tahoe Meadows at Hwy 50/Lake Road needs to be included in the EIR/EIS/EIS analysis under this objective.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Restricting Tahoe Meadows traffic to right in/right out access as illustrated in Exhibits for Alternatives B, C (including mitigation measures) and D will increase

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overall vehicle delays at Hwy 50/Lake Road, Hwy 50/Wildwood Ave. and Hwy 50/Pioneer Trail.

- Loss of the left in/left out turn motions will force hundreds of additional summer peak average day vehicles to make U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to replace the lost left turn patterns.
- Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay.
- Added delay and longer queuing for the left turn at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. would degrade the LOS at both intersections under Alternatives B, C (including mitigation measures) and D.
- Vehicles entering Tahoe Meadows with right in only access would have to queue in the westbound travel lane of Hwy 50 to wait for cars ahead to use the Tahoe Meadows gate keypad. This is dangerous and will result in degraded LOS for the Hwy 50 road segment east of the Hwy 50/Lake Road intersection.
- These access changes will adversely impact the Tahoe Meadows resident and visitor experience.

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cont.

## 2 PROPOSED PROJECT AND PROJECT ALTERNATIVES

### 2.3 COMMON FEATURES OF ALTERNATIVES B THROUGH D

#### 2.3.3 Corridor Improvements and Enhanced Bicycle, Transit, and Pedestrian Facilities

##### CHANGES IN THE LINEAR PARK

(page 161, 2-19) This section inadequately describes the changes proposed to the Linear Park by not including the information shown on the exhibits in Appendix N.

- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards to Linear Park users at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows

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Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.

- The redesign of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) eliminates the space for an entering vehicle between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade bicycle/pedestrian user safety within the Linear Park in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
  - Routing the shared path too close to the fence would create a hazard for bicycle riders and pedestrians. The Tahoe Meadows fence is a metal picket fence so if a rider clips the fence, the handle bars may hang up between the pickets and cause a nasty crash.
  - Riding close to a fence is an uncomfortable riding experience which sends the rider into the center of the shared path. Riding in the center of the path is hazardous to pedestrians and oncoming bicyclists.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- Reducing the separation between the Linear Park shared path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

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cont.

## 2.4 DIFFERENTIATING FEATURES OF ALTERNATIVES

### 2.4.2 Alternative B: Triangle (Locally Preferred Action)

#### ROAD NETWORK CHANGES

(page 164, 2-22) This draft EIR/EIS/EIS section is **inadequate** because it fails to identify and describe the significant changes to the intersection of Hwy 50/Lake Road and adverse impacts to study area intersections and road segments that result from the changes.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.

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- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The elimination of left in/left out turns at Hwy 50/Lake Road would significantly increase the need for of U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. by hundreds of additional summer peak average day U-turns.
  - Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay. This will significantly degrade the LOS at both intersections.
- The loss of left in/left out turns at Hwy 50/Lake Road would increase the number of right in turns at this intersection by hundreds of additional summer peak average day vehicle trips. These vehicles would have to queue in the travel lane to wait for cars ahead to use the Tahoe Meadows gate keypad. This would degrade the road segment LOS of westbound Hwy 50 east of this intersection.
  - A significant safety issue and the hazard of increased rear-end collisions due to stopped traffic in the travel lane is created by this change.
- These significant changes in the road network function should be included in the EIR/EIS/EIS description and analysis.

### INTERSECTION IMPROVEMENTS

(page 165, 2-23) This section is inadequate because it fails to identify and describe the significant changes and adverse impacts to the intersection of Hwy 50/Lake Road.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The elimination of left in/left out turns at Hwy 50/Lake Road would significantly increase the need for of U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. by hundreds of additional summer peak average day U-turns.
  - Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay. This will significantly degrade the LOS at both intersections.
- The loss of left in/left out turns at Hwy 50/Lake Road would increase the number of right in turns at this intersection by hundreds of additional summer peak average day vehicle trips. These vehicles would have to queue in the travel lane to wait for cars ahead to use the Tahoe Meadows gate keypad. This would degrade the road segment LOS of westbound Hwy 50 east of this intersection.

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cont.

## TAHOE MEADOWS

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- A significant safety issue and the hazard of increased rear-end collisions due to stopped traffic in the travel lane is created by this change.
- These significant changes in the intersection function should be included in the EIR/EIS/EIS description and analysis.

#### 2.4.3 Alternative C: Triangle One-Way

##### ROAD NETWORK CHANGES

(page 172, 2-30) This section is inadequate because it fails to identify and describe the significant changes to the intersection of Hwy 50/Lake Road and adverse impacts to study area intersections and road segments that result from the changes.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The elimination of left in/left out turns at Hwy 50/Lake Road would significantly increase the need for of U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. by hundreds of additional summer peak average day U-turns.
  - Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay. This will significantly degrade the LOS at both intersections.
- The loss of left in/left out turns at Hwy 50/Lake Road would increase the number of right in turns at this intersection by hundreds of additional summer peak average day vehicle trips. These vehicles would have to queue in the travel lane to wait for cars ahead to use the Tahoe Meadows gate keypad. This would degrade the road segment LOS of westbound Hwy 50 east of this intersection.
  - A significant safety issue and the hazard of increased rear-end collisions due to stopped traffic in the travel lane is created by this change.
- These significant changes in the road network function should be included in the EIR/EIS/EIS description and analysis.

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cont.

##### INTERSECTION IMPROVEMENTS

(page 172, 2-30) This section is inadequate because it fails to identify and describe the significant changes and adverse impacts to the intersection of Hwy 50/Lake Road.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.

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- The elimination of left in/left out turns at Hwy 50/Lake Road would significantly increase the need for of U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. by hundreds of additional summer peak average day U-turns.
  - Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay. This will significantly degrade the LOS at both intersections.
- The loss of left in/left out turns at Hwy 50/Lake Road would increase the number of right in turns at this intersection by hundreds of additional summer peak average day vehicle trips. These vehicles would have to queue in the travel lane to wait for cars ahead to use the Tahoe Meadows gate keypad. This would degrade the road segment LOS of westbound Hwy 50 east of this intersection.
  - A significant safety issue and the hazard of increased rear-end collisions due to stopped traffic in the travel lane is created by this change.
- These significant changes in the intersection function should be included in the EIR/EIS/EIS description and analysis.

#### 2.4.4 Alternative D: PSR Alternative 2

##### ROAD NETWORK CHANGES

(page 174, 2-32) This section is inadequate because it fails to identify and describe the significant changes to the intersection of Hwy 50/Lake Road and adverse impacts to study area intersections and road segments that result from the changes.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The elimination of left in/left out turns at Hwy 50/Lake Road would significantly increase the need for of U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. by hundreds of additional summer peak average day U-turns.
  - Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay. This will significantly degrade the LOS at both intersections.
- The loss of left in/left out turns at Hwy 50/Lake Road would increase the number of right in turns at this intersection by hundreds of additional summer peak average day vehicle trips. These vehicles would have to queue in the travel lane to wait for cars ahead to use the Tahoe Meadows gate keypad. This would degrade the road segment LOS of westbound Hwy 50 east of this intersection.
  - A significant safety issue and the hazard of increased rear-end collisions due to stopped traffic in the travel lane is created by this change.

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cont.

## TAHOE MEADOWS

### Historic District

- These significant changes in the road network function should be included in the EIR/EIS/EIS description and analysis.

#### INTERSECTION IMPROVEMENTS

(page 174, 2-32) This section is inadequate because it fails to identify and describe the significant changes and adverse impacts to the intersection of Hwy 50/Lake Road.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The elimination of left in/left out turns at Hwy 50/Lake Road would significantly increase the need for of U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. by hundreds of additional summer peak average day U-turns.
  - Since U-turns are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay. This will significantly degrade the LOS at both intersections.
- The loss of left in/left out turns at Hwy 50/Lake Road would increase the number of right in turns at this intersection by hundreds of additional summer peak average day vehicle trips. These vehicles would have to queue in the travel lane to wait for cars ahead to use the Tahoe Meadows gate keypad. This would degrade the road segment LOS of westbound Hwy 50 east of this intersection.
  - A significant safety issue and the hazard of increased rear-end collisions due to stopped traffic in the travel lane is created by this change.
- These significant changes in the intersection function should be included in the EIR/EIS/EIS description and analysis.

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cont.

#### 2.4.6 Construction Overview

##### CONSTRUCTION PHASING AND SCHEDULE OVERVIEW

(page 183, 2-41) *Access to Van Sickle Bi-State Park and all businesses would be maintained for the duration of construction activities.*

- Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road must also be maintained.
- Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles and this emergency access gate must remain accessible at all times during construction.

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#### TRAFFIC CONTROL MEASURES

(page 184, 2-42) *Emergency service providers, businesses, and other affected public would be notified about any planned lane closures and reduced lane widths, and a traffic management plan would be prepared to specify how emergency services would be provided during construction.*

- Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles and this emergency access gate must remain accessible at all times during construction.

#### CONSTRUCTION STAGING AREAS

(page 184, 2-42) *Bullet 3#: the existing US 50 right-of-way abandoned after the construction of the new alignment of US 50, which would be used during construction of the tourist core improvements only.*

- The proposed construction staging area on the abandoned US 50 right of way would block Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road.
- Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles and this emergency access gate must remain accessible at all times during construction.

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cont.

#### 2.4.8 Further Development of Project Design

(page 185, 2-43) *The development of alternatives and project refinements has occurred in response to input from the Project Development Team (PDT; a collaboration of public agency staff members assisting the lead agencies in project planning), other interested agencies, and members of the public in an effort to reduce cost and minimize areas of disturbance (temporary and permanent).*

- Tahoe Meadows homeowners participated in public input and offered important information regarding neighborhood access issues in writing and orally, at public comment opportunities such as workshops and informational presentations, during membership in the Citizen Review Committee, and by email to project managers Alfred Knotts and Russell Nygaard.
- Tahoe Meadows' participation in the planning process has been ongoing since 2011.

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- Despite repeated assurances from project staff that Tahoe Meadows' concerns were known and recognized as constraints on design, this input was not included in the alternative designs, impact identification or analysis presented in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS is **inadequate** because it does not assess the impact on study area intersections and road segments including the changes at Hwy 50/Lake Road combined with the impact of the sub-minimum buffers in the redesign the Linear Park at that location as shown in Appendix N.

(page 184, 2-42) *Design information has been refined and presented, as it became available, to the PDT, public, and decision makers.*

- There was no effort to inform Tahoe Meadows homeowners of the significant changes to the designs that eliminate the left in/left out turns at Hwy 50/Lake Road or the significant changes to drastically reduce the width of the Linear park to accommodate Hwy 50 widening at that intersection.
- Project staff was provided a contact person for the Tahoe Meadows Homeowners Association and several homeowners commented at many of the public open house and workshop including their contact information on the provided sign-in sheets.
- No effort was made by project staff to share the changes as illustrated in the draft EIR/EIS/EIS. In fact, as late as the April 27, 2017 open house event, Tahoe Meadows homeowners continued to be told by project staff that left in/left out turns at Hwy 50/Lake Road would be retained. That is not reflected in the designs presented in the draft EIR/EIS/EIS.

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cont.

### 3 AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND AVOIDANCE, MINIMIZATION, AND/OR MITIGATION MEASURES

#### 3.2 LAND USE

##### 3.2.2 Affected Environment

##### EXISTING LAND USES WITHIN THE STUDY AREA

(page 206, 3.2-8) The Tahoe Meadows Historic District is within the study area (Exhibits S-1, 2-1, and 3.6-1) and should be listed in this section. The intersection of Hwy 50/Lake Road (Tahoe Meadows' only entry point) is in the project site.

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##### 3.3 PARKS AND RECREATION FACILITIES

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### Historic District

#### Impact 3.3-1: Temporary disruption of public access to public lands and recreation areas

##### Linear Park

(page 236, 3.3-12) *Portions of the Linear Park would be narrowed and the shared-use path realigned to the northwest; however, where a realigned path would be constructed it would continue to be 8 feet wide (see Appendix N). Sections of the path would be relocated up to 1 foot away from the wrought iron fence around Tahoe Meadows. Depending on the alternative, between seven and nine street lamps would be relocated within the Linear Park. The project would not affect public art or benches in the Linear Park and no changes would be made to the fence.*

- This discussion of permanent changes to the Linear Park does not belong in this discussion of temporary disruption to recreation areas. It belongs in Impact 3.3-4: Changes to the quality of recreation user experience.

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cont.

#### Impact 3.3-4: Changes to the quality of recreation user experience

The analysis of impacts on the quality of recreation user experience fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road and the redesign of the Linear Park under alternatives B, C (including mitigation measures) and D.

(page 250, 3.3-26) The description of the changes located in Impact 3.3-1: Temporary disruption of public access to public lands and recreation areas - Linear Park - (page 236, 3.3-12) should be in this section: *Portions of the Linear Park would be narrowed and the shared-use path realigned to the northwest; however, where a realigned path would be constructed it would continue to be 8 feet wide (see Appendix N). Sections of the path would be relocated up to 1 foot away from the wrought iron fence around Tahoe Meadows. Depending on the alternative, between seven and nine street lamps would be relocated within the Linear Park. The project would not affect public art or benches in the Linear Park and no changes would be made to the fence.*

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AND

(page 250, 3.3-26) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *The effects of Alternatives B, C, and D transportation improvements on the quality of recreation user experience at the Linear Park and Edgewood Companies mountain parcel would not be substantial because recreation user experience at these facilities is currently influenced by similar vehicle traffic on adjacent US 50 and Lake Parkway and the user experience would be similar to existing conditions* cannot be made.

AND

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(page 250, 3.3-26) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *Recognizing the influence of the combination of both detractors and enhancements to recreation resource site conditions (i.e., adverse for forest use, beneficial for access and amenities) and reasonably anticipating that user expectations take into account the setting, nearby urban area, and existing use patterns, the effect of the project's infrastructure improvements would have little effect on the quality of recreation user experiences in the study area cannot be made.*

- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards to Linear Park users at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Proposed changes to the Linear Park profile under Alternatives B, C (including mitigation measures) and D as shown in Appendix N would significantly degrade bicycle/pedestrian user safety within the Linear Park in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
  - Routing the shared path too close to the fence would create a hazard for bicycle riders and pedestrians. The Tahoe Meadows fence is a metal picket fence so if a rider clips the fence, the handle bars may hang up between the pickets and cause a nasty crash.

15-66  
cont.

## TAHOE MEADOWS Historic District

- Riding close to a fence is an uncomfortable riding experience which sends the rider into the center of the shared path. Riding in the center of the path is hazardous to pedestrians and oncoming bicyclists.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- Reducing the separation between the Linear Park shared path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.
- The impact is Significant.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-66  
cont.

### NEPA Environmental Consequences:

(page 250, 3.3-26) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *NEPA Environmental Consequences: The design features of Alternatives B, C, D, and Alternative E would avoid or minimize the change in the quality of recreation user experience environmental consequences such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### CEQA/TRPA Impact Determinations:

(page 250, 3.3-26) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *CEQA/TRPA Impact Determinations: Less than Significant for Alternatives B, C, and D* cannot be made.

AND

### Alternative B: Triangle (Locally Preferred Action)

#### **Transportation Improvements**

(page 252, 3.3-28) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *Implementation of the Alternative B transportation improvements roadway improvements would not result in substantial changes to recreation user experience at the Linear Park or on the Edgewood Companies mountain side parcel because recreation user experience at these facilities is currently influenced by similar vehicle traffic on adjacent US 50 and Lake Parkway* cannot be made.

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AND

(page 252, 3.3-28) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For these reasons, and taking into account the park setting in proximity to an urban area, Alternative B transportation improvements would not substantially diminish recreation user experience. This would be a less-than-significant impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 252, 3.3-28) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the potential for substantially diminishing the quality of the recreation user experience such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### **Conclusion**

(page 253, 3.3-29) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and mixed-use development including replacement housing would result in a less than significant impact on the quality of recreation user experience at recreation resources in the study area* cannot be made.

AND

(page 253, 3.3-29) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing at the mixed-use development sites as part of Alternative B would minimize the effects on quality of recreation user experience at recreation resources in the study area such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### **Alternative C: Triangle One-Way**

##### **Transportation Improvements**

(page 253, 3.3-29) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For these reasons and the reasons described above for Alternative B transportation improvements,*

15-66  
cont.



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*Alternative C transportation improvements would result in a less-than significant impact on the quality of recreation user experience at recreation resources in the study area for the purposes of CEQA and TRPA cannot be made.*

AND

(page 253, 3.3-29) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the potential for substantially diminishing the quality of the recreation user experience such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

### **Conclusion**

(page 254, 3.3-30) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative C transportation improvements and mixed-use development including replacement housing would result in a less than significant impact on the quality of recreation user experience at recreation resources in the study area cannot be made.*

AND

(page 254, 3.3-30) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing at the mixed-use development sites as part of Alternative C would minimize the effects on quality of recreation user experience at recreation resources in the study area such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

### **Alternative D: Project Study Report Alternative 2**

#### **Transportation Improvements)**

(page 254, 3.3-30) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *Alternative D transportation improvements, would include similar improvements near the Linear Park, ... as Alternative B transportation improvements. For these reasons and the reasons described above for Alternative B transportation improvements, Alternative D transportation improvements would result in a less than significant impact on the quality of recreation user experience at recreation resources in the study area for the purposes of CEQA and TRPA cannot be made.*

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15-66  
cont.



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AND

(page 254, 3.3-30) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize the potential for substantially diminishing the quality of the recreation user experience such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### **Conclusion**

(page 255, 3.3-31) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and mixed-use development including replacement housing would result in a less than significant impact on the quality of recreation user experience at recreation resources in the study area* cannot be made.

AND

(page 255, 3.3-31) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing at the mixed-use development sites as part of Alternative D would minimize the effects on quality of recreation user experience at recreation resources in the study area such that no additional mitigation measures are needed or feasible to implement* cannot be made.

15-66  
cont.

- Changes to the Linear Park profile as shown in Appendix N create Significant impacts on the Linear Park user experience.
- Drastic reduction in the profile of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) creates new significant hazards for vehicles, bicyclists and pedestrians.
- Drastic reduction in the Linear Park profile as shown in Appendix N would significantly degrade the user experience in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- Reducing the separation between the path and Hwy 50 would adversely affect the safety of the recreational user, the user experience and the recreational value of the Linear Park.

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- Reducing the separation between the path and the Tahoe Meadows fence would adversely affect the safety of the recreational user, the user experience and the recreational value of the Linear Park.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.
- The impact is Significant.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-66  
cont.

### 3.4 COMMUNITY IMPACTS

(page 257, 3.4) This entire draft EIR/EIS/EIS section is **inadequate** because it fails to include analysis of the degraded quality of life for the Tahoe Meadows neighborhood resulting from the proposed changes in access at Hwy 50/Lake Road and the redesign of the Linear Park to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.

- An impact statement is needed to address the proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D.
- The proposed changes to the intersection of Hwy 50/Lake Road affect the quality of life for Tahoe Meadows neighborhood residents and guests as well as bicyclists and pedestrians using the Linear Park in front of Tahoe Meadows.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits clearly impact the neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- Hundreds of summer peak average day Tahoe Meadows vehicles would be required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation

15-67

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measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.

- Hundreds of summer peak average day Tahoe Meadows vehicles would be required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- Hundreds of additional summer peak average day right turns into Tahoe Meadows on the westbound road segment between Hwy 50/Pioneer Trail and Hwy/50 Lake Road would degrade the road segment operation and create hazardous conditions:
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to open the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- These changes to the intersection of Hwy 50/Lake Road will impact the quality of life of the broader community by degrading intersection operations and creating hazardous conditions on Hwy 50 and in the Linear Park.

15-67  
cont.

(page 257, 3.4) *Bullet point #11: Acquisition of Tahoe Meadows land is unclear.*

- No discussion or clarification appears in the text. This bullet point should be discussed.
- Tahoe Meadows strenuously objects to any land acquisition of Association or privately-owned land within the Tahoe Meadows subdivision.
- Pages 269 – 271, Exhibits 3.4-2, -3, -4 and Appendix B indicate that several parcels owned by the City of South Lake Tahoe along the frontage of Tahoe Meadows from either side of Hwy 50/Lake Road intersection and connected

15-68

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eastward are on the list of properties to be acquired for Hwy 50 realignment under Alternatives B, C and D.

- If the acquisition includes any area where the existing fence is located, Tahoe Meadows expects the acquiring agency to assume the obligation to maintain the fence in its current location and condition as well as the obligation to maintain landscaping as agreed by the City of South Lake Tahoe in the original acquisition process.

15-69  
cont.

#### **Impact 3.4-1: Physically divide an established community causing changes to community character and cohesion**

##### **Alternative B: Triangle (Locally Preferred Action)**

##### ***Mixed-Use Development including Replacement Housing***

(page 275, 3.4-19) *The mixed-use development at Site 1 would be physically and visually separated from the Tahoe Meadows Historic District by the Linear Park and existing wrought iron fence; it would replace older commercial development with newer buildings that are consistent in character with other surrounding uses, such as the Holiday Inn Express.*

15-70

- A wrought iron picket fence provides minimal physical separation and zero visual separation. This description of the fence should be amended to remove that characterization.
- Development at Site 1 should be scaled to be consistent with the scale of the Tahoe Meadows Historic District where such development would be seen in the same the visual envelope.
  - Reduce the height of buildings to two stories on Site 1 to preserve the Tahoe Meadows Historic District setting.

15-71

(page 275, 3.4-19) *The access to Tahoe Meadows via Lodge Road and access to the Holiday Inn Express would be maintained through Site 1.*

- It is appreciated that emergency access to Tahoe Meadows would be maintained. Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles and this emergency access gate must remain accessible at all times during construction (including construction staging activities) as well as at completion of all phases of improvements.

15-72

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#### Alternative C: Triangle One-Way

##### ***Mixed-Use Development including Replacement Housing***

(page 279, 3.4-23) *The emergency access to Tahoe Meadows on Lodge Road and access to the Holiday Inn Express would be maintained.*

- It is appreciated that emergency access to Tahoe Meadows would be maintained. Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles and this emergency access gate must remain accessible at all times during construction (including construction staging activities) as well as at completion of all phases of improvements.

15-72  
cont.

#### **3.6 TRAFFIC AND TRANSPORTATION**

(page 367, 3.6-1) The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.

- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.

15-73

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- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of the westbound Hwy 50 road segment between Hwy 50/Pioneer Trail and Hwy/50 Lake Road from hundreds of additional summer peak average day right turns into Tahoe Meadows:
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- The impact is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

15-73  
cont.



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- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

(page 367, 3.6-1) *The City of South Lake Tahoe requested that the EIR/EIS/EIS analyze impacts at all affected intersections and road segments, including surrounding local streets; impacts on bicycle and pedestrian traffic and transit service; and short-term impacts during construction, including construction traffic routing and potential impacts on business access and parking.*

15-73  
cont.

- Despite this request by the City of South Lake Tahoe, the draft EIR/EIS/EIS fails to mention, describe, analyze or mitigate the adverse impacts caused by changes to the intersection of Hwy 50/Lake Road combined with the drastic redesign of the Linear Park in that location.

### 3.6.1 Regulatory Setting

#### FEDERAL

(page 368, 3.6-2) *When current or anticipated pedestrian and/or bicycle traffic presents a potential conflict with motor vehicle traffic, every effort must be made to minimize the detrimental effects on all highway users who share the facility.*

AND

#### STATE

##### California

##### California Department of Transportation

(page 371, 3.6-5) *When current or anticipated pedestrian and/or bicycle traffic presents a potential conflict with motor vehicle traffic, every effort must be made to minimize the detrimental effects on all highway users who share the facility.*

15-74

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.
- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:

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- ❑ reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - ❑ drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of the westbound Hwy 50 road segment between Hwy 50/Pioneer Trail and Hwy 50/Lake Road from hundreds of additional summer peak average day right turns into Tahoe Meadows:
  - ❑ The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - ❑ This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to

15-74  
cont.

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enter. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.

- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-74  
cont.

### LOCAL

#### *City of South Lake Tahoe General Plan*

##### *Level of Service Requirements*

(page 372, 3.6-6) *The General Plan contains goals and policies designed to create a well-connected transportation network that serves all residents and visitors. Policy TC-1.2 identifies LOS D as the minimum level for all city streets and intersections, with up to four hours per day of LOS E being acceptable.*

- Proposed design features in Alternatives B, C (including mitigation measures) and D will change the access to Tahoe Meadows at the intersection of Hwy 50/Lake Road resulting in degraded performance at local intersections and road segments.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The EIR/EIS/EIS analysis must include the impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.

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- The EIR/EIS/EIS analysis must include the impact on LOS of hundreds of additional summer peak average day right turns into Tahoe Meadows on the westbound Hwy 50 road segment between Hwy 50/Pioneer Trail and Hwy/50 Lake Road.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-75  
cont.

### EXISTING TRANSPORTATION FACILITIES

(page 373, 3.6-7 and Exhibit 3.6-1) The draft EIR/EIS/EIS is **inadequate** because it fails to include analysis of Lake Road as an existing transportation facility

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits clearly impact the neighborhood's access at Hwy 50/Lake Road by reconfiguring Hwy 50 to eliminate the left in/left out turning motions for vehicle entering or leaving Tahoe Meadows.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.

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## TAHOE MEADOWS Historic District

### HISTORIC AND EXISTING TRAFFIC VOLUMES

#### *Existing Traffic Volumes*

(page 376, 3.6-10) The draft EIR/EIS/EIS analysis is **inadequate** because it fails to consider traffic volumes at Hwy 50/Lake Road.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- Tahoe Meadows traffic must be included in existing traffic volumes to inform predictions for 2020 and 2040.

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### EXISTING INTERSECTION AND ROADWAY SEGMENT LEVELS OF SERVICE

(page 377, 3.6-11) The draft EIR/EIS/EIS analysis is **inadequate** because it fails to include the intersection at Hwy 50/Lake Road.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- Analysis of existing conditions must include Tahoe Meadows traffic to inform predictions for 2020 and 2040.

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### 3.6.3 Environmental Consequences

#### **Impact 3.6-2: Impacts of transportation improvements on intersection operations – 2020 (Opening Day)**

(page 401, 3.6-35) The analysis of impacts of transportation improvements on intersection operations fails to consider the significant impacts of proposed changes to

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access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D.

- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS at the intersection of Hwy/50 Lake Road from hundreds of additional summer peak average day right turns into Tahoe Meadows:
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while

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cont.

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vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.

- This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- The impact is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### NEPA Environmental Consequences:

(page 401, 3.6-35) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *The design features of Alternatives A, B, D, and E would avoid or minimize the impacts on intersection operations in 2020 such that no additional mitigation measures are needed or feasible to implement. Mitigation Measure 3.6-2 has been incorporated into Alternative C to further reduce to the extent feasible the environmental consequences related to impacts on intersection operations in 2020* cannot be made.

AND

#### CEQA/TRPA Impact Determinations:

(page 401, 3.6-35) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Beneficial for Alternatives B, D, and E; Less Than Significant for Alternative A; Less Than Significant for Alternative C after implementation of Mitigation Measure 3.6-2* cannot be made.

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cont.

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AND

### **Alternative B: Triangle (Locally Preferred Action)**

#### ***Transportation Improvements***

(page 402, 3.6-36) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, because intersection operations would remain at acceptable LOS for all study area intersections and would improve for the intersections listed above, implementation of transportation improvements included in Alternative B on opening day would result in a beneficial impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 402, 3.6-36) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the impacts on intersection operations in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **Alternative C: Triangle One-Way**

#### ***Transportation Improvements***

(page 402, 3.6-36) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, because of LOS intersection operations exceeding acceptable levels at the intersections detailed above, implementation of Alternative C transportation improvements on opening day would result in a significant impact for the purposes of CEQA and TRPA* is incomplete.

AND

(page 402, 3.6-36) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, additional mitigation measures have been incorporated into the transportation improvements included in Alternative C to further reduce to the extent feasible the environmental consequences related to unacceptable LOS during opening day peak-hour operations* cannot be made.

AND

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cont.

## TAHOE MEADOWS Historic District

### Alternative D: Project Study Report Alternative 2

#### **Transportation Improvements**

(page 403, 3.6-37) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, because operations would be at acceptable LOS for all study area intersections and would improve for the intersections listed above, implementation of transportation improvements included in Alternative D on opening day would result in a beneficial impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 403, 3.6-37) Without analysis of the impact of intersection changes at Hwy 50/Lake Road, the statement *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize the impacts on intersection operations in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

- The adverse impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The adverse impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection to accommodate the widening of Hwy 50 as shown in Appendix N under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified combined impact of these changes at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The draft EIR/EIS/EIS fails to identify solutions and mitigations for these adverse impacts.
- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections as well as the safety of vehicles, bicyclists, and pedestrians.
- The impact is Potentially Significant.
- Maintaining the left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at Hwy 50/Lake Road intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

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cont.

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#### Impact 3.6-3: Impacts on roadway segment operations – 2020 (Opening Day)

The analysis of impacts on roadway segment operations – 2020 (Opening Day) fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D.

(page 414, 3.6-48) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Under the opening day conditions, Alternatives B, D, and E would result in acceptable roadway segment LOS during annual average and summer peak hours. Alternative E would actually improve roadway segment LOS for both roadway study segments during summer peak conditions. However, with Alternative C, three roadway segments within the study area (eastbound and westbound existing US 50 between Pioneer Trail and Park Avenue and one-way eastbound US 50 between Park Avenue and Lake Parkway) would be reduced to unacceptable roadway segment LOS cannot be made.*

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.
- The proposed changes adversely affect the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail as well as the safety of vehicles, bicyclists, and pedestrians at the intersection of Hwy 50/Lake Road.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows

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### Historic District

entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.

- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- The impact is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### NEPA Environmental Consequences:

(page 414, 3.6-48) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives A, B, D, and E would avoid or minimize the impacts on roadway segment operations in 2020 such that no additional mitigation measures are needed or feasible to implement; Mitigation Measure 3.6-3 has been incorporated into Alternative C to further reduce to the extent feasible the impacts on roadway segment operations in 2020 cannot be made.*

AND

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cont.



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### **CEQA/TRPA Impact Determinations:**

(page 414, 3.6-48) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Less Than Significant for Alternative A and for Alternatives B and D; Significant and Unavoidable for Alternative C after implementation of Mitigation Measure 3.6-3* cannot be made.

AND

### **Alternative B: Triangle (Locally Preferred Action)**

#### ***Transportation Improvements***

(page 414, 3.6-48) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *As shown in Table 3.6-14, all study area arterial segments after implementation of Alternative B transportation improvements are projected to operate at annual average and summer peak-hour LOS D or better under opening day conditions. Thus, because LOS segment operations would remain at acceptable levels for all study area arterial segments, implementation of Alternative B would result in a less-than significant impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 414, 3.6-48) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of Alternative B would avoid or minimize the impacts on roadway segment operations in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **Alternative C: Triangle One-Way**

#### ***Transportation Improvements***

(page 416, 3.6-50) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *As shown in Table 3.6-14, with implementation of transportation improvements included in Alternative C, one arterial/highway segment is projected to operate at LOS E or worse for more than 4 hours per day during the summer peak under opening day conditions: Westbound Old US 50 between Pioneer Trail and Park Avenue* cannot be made

AND

(page 416, 3.6-50) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, because segment operations for one roadway segment would be reduced to*

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cont.



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*unacceptable LOS, implementation of Alternative C transportation improvements on opening day would result in a significant impact for the purposes of CEQA and TRPA cannot be made.*

AND

(page 416, 3.6-50) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, additional mitigation measures have been incorporated into the transportation improvements included in Alternative C to further reduce to the extent feasible the environmental consequences related to unacceptable LOS on a roadway segment in 2020 cannot be made.*

AND

#### **Alternative D: Project Study Report (Alternative 2)**

##### ***Transportation Improvements***

(page 416, 3.6-50) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *As shown in Table 3.6-14, with implementation of Alternative D transportation improvements, all study area arterial/highway segments are projected to operate at annual average and summer peak-hour LOS D or better under opening day conditions cannot be made.*

AND

(page 416, 3.6-50) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, because segment operations would remain at acceptable LOS, implementation of Alternative D transportation improvements on opening day would result in a less-than significant impact for the purposes of CEQA and TRPA cannot be made.*

AND

(page 416, 3.6-50) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of Alternative D transportation improvements would avoid or minimize the impacts on roadway segment operations in 2020 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.

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cont.

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- The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
- This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- The impact is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

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cont.

### Impact 3.6-4: Impacts on vehicle miles of travel – 2020 (Opening Day)

The analysis of impacts on vehicle miles traveled fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D.

(page 417, 3.6-51) The impact on VMT of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D is not identified.

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- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed change in access to Tahoe Meadows at Hwy 50/Lake Road under proposed Alternatives B, C (including mitigation measures) and D.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
  - Information about the number of vehicle trips at Hwy 50/Lake Road was made available to the project team in 2013 yet the study fails to include

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the loss of the left in/left out turning motions at Hwy 50/Lake Road for the Tahoe Meadows neighborhood of 96 homes.

- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits eliminate left in/left out turns at Hwy 50/Lake Road for vehicles entering or leaving Tahoe Meadows.
  - Eliminating left in/left out access will result in hundreds of additional summer peak average day U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to accomplish the lost left in/left out turns.
  - It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible. This would greatly increase the VMT for trips to and from Tahoe Meadows.
- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.
- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

- **NEPA Environmental Consequences:**

(page 417, 3.6-51) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives A, B, C, D, and E would avoid or minimize the impacts on VMT in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

- **CEQA/TRPA Impact Determinations:**

(page 417, 3.6-51) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Beneficial for Alternatives B, C, and D* cannot be made.

AND

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cont.

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### **Alternative B: Triangle (Locally Preferred Action)**

#### ***Transportation Improvements***

(page 419, 3.6-53) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *implementation of transportation improvements included in Alternative B on opening day would have a beneficial impact on VMT for the purposes of CEQA and TRPA* cannot be made.

AND

(page 419, 3.6-53) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize impacts on VMT in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **Alternative C: Triangle One-Way**

#### ***Transportation Improvements***

(page 419, 3.6-53) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, implementation of transportation improvements included in Alternative C would support the RTP's beneficial impact on VMT for the purposes of CEQA and TRPA* cannot be made.

AND

(page 419, 3.6-53) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative C would avoid or minimize impacts on VMT in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **• Alternative D: Project Study Report Alternative 2**

#### ***Transportation Improvements***

(page 420, 3.6-54) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, implementation of transportation improvements included in Alternative D would support the RTP's beneficial impact on VMT for the purposes of CEQA and TRPA* cannot be made.

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cont.

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AND

(page 420, 3.6-54) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize impacts on VMT in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits eliminate left in/left out turns at Hwy 50/Lake Road for vehicles entering or leaving Tahoe Meadows.
  - Eliminating left in/left out access will result in hundreds of additional summer peak average day U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to accomplish the lost left in/left out turns.
- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.
- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

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cont.

### **Impact 3.6-5: Impacts on bicycle and pedestrian facilities – 2020 (Opening Day)**

The analysis of impacts on bicycle and pedestrian facilities – 2020 (Opening Day) fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road and the redesign of the Linear Park under alternatives B, C (including mitigation measures) and D.

(page 420, 3.6-54) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Because of their design, Alternatives B, C, D, and E would not disrupt or interfere with existing or planned bicycle/pedestrian facilities; rather, they would enhance the existing infrastructure and create a bicycle and pedestrian network with enhanced connectivity. Furthermore, Alternatives B, C, D, and E would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems* cannot be made.

- The draft EIR/EIS/EIS is **inadequate** because it fails to include the proposed changes at Hwy 50/Lake Road under proposed Alternatives B, C (including mitigation measures) and D.

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- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile to accommodate the widening of Hwy 50 as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road as shown in Appendix N, trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road as shown in Appendix N, all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road as shown in Appendix N eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.
- Proposed changes to the Linear Park profile as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.

15-82  
cont.

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### Historic District

- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### **NEPA Environmental Consequences:**

(page 421, 3.6-55) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives B, C, D, and E would avoid or minimize the impacts on bicycle and pedestrian facilities in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### **CEQA/TRPA Impact Determinations:**

(page 421, 3.6-55) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Beneficial for Alternatives B, C, D, and E;* cannot be made.

AND

#### **Alternative B: Triangle (Locally Preferred Action)**

##### ***Transportation Improvements***

(page 421, 3.6-55) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alternative B would improve existing bicycle/pedestrian infrastructure and improve connectivity within the study area. Furthermore, Alternative B would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems. Therefore, the impact of Alternative B transportation improvements on opening day would be beneficial for the purposes of CEQA and TRPA* cannot be made.

AND

(page 421, 3.6-55) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize any inconsistencies with adopted policies related to bicycle or pedestrian systems such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

15-82  
cont.

## TAHOE MEADOWS

### Historic District

#### **Alternative C: Triangle One-Way**

##### ***Transportation Improvements***

(page 422, 3.6-56) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alternative C would improve existing bicycle/pedestrian infrastructure and improve connectivity within the study area. Furthermore, Alternative C would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems. Therefore, the impact of Alternative C transportation improvements on opening day would be beneficial for the purposes of CEQA and TRPA* cannot be made.

AND

(page 422, 3.6-56) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative C would avoid or minimize any inconsistencies with adopted policies related to bicycle or pedestrian systems such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### **Alternative D: Project Study Report Alternative 2**

##### ***Transportation Improvements***

(page 422, 3.6-56) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alternative D would improve existing bicycle/pedestrian infrastructure and improve connectivity within the study area. Furthermore, Alternative D would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems. Therefore, the impact of Alternative D transportation improvements on opening day would be beneficial for the purposes of CEQA and TRPA* cannot be made.

AND

(page 423, 3.6-57) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize any inconsistencies with adopted policies related to bicycle or pedestrian systems such that no additional mitigation measures are needed or feasible to implement* cannot be made.

- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.

15-82  
cont.

## TAHOE MEADOWS Historic District

- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign as shown in Appendix N to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection.
- Proposed changes to the Linear Park profile as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-82  
cont.

### **Impact 3.6-8: Impacts on vehicular, bicycle, and pedestrian safety – 2020 (Opening Day)**

The analysis of impacts on vehicular, bicycle, and pedestrian safety – 2020 (Opening Day) fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road and the redesign of the Linear Park under alternatives B, C (including mitigation measures) and D.

(page 432, 3.6-66) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park, the conclusion *Alternatives B, C, D, and E would enhance the existing infrastructure and improve safety throughout the vehicular, bicycle, and pedestrian network within the study area* cannot be made.

- The draft EIR/EIS/EIS is **inadequate** because it fails to include the proposed changes at Hwy 50/Lake Road under proposed Alternatives B, C (including mitigation measures) and D.
- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road is not included or analyzed in this draft EIR/EIS/EIS.

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## TAHOE MEADOWS Historic District

- The impact of proposed Linear Park redesign as shown in Appendix N to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile to accommodate the widening of Hwy 50 as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road as shown in Appendix N, trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road as shown in Appendix N, all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road as shown in Appendix N eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.
- Proposed changes to the Linear Park profile as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.

15-83  
cont.

## TAHOE MEADOWS

### Historic District

- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### **NEPA Environmental Consequences:**

(page 432, 3.6-66) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives B, C, D, and E would avoid or minimize the impacts on vehicular, bicycle, and pedestrian safety in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### **CEQA/TRPA Impact Determinations:**

(page 432, 3.6-66) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Beneficial for Alternatives B, C, D, and E* cannot be made.

AND

#### **Alternative B: Triangle (Locally Preferred Action)**

##### ***Transportation Improvements***

(page 433, 3.6-67) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, because the proposed design features would improve vehicular, bicycle, and pedestrian safety, implementation of Alternative B transportation improvements on opening day would result in a beneficial impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 433, 3.6-67) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize environmental consequences related to vehicular, bicycle, and pedestrian safety such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

##### ***Conclusion***

(page 434, 3.6-68) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and replacement housing at one or more of the three mixed-use sites* Tahoe Meadows Comments US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS

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cont.



## TAHOE MEADOWS Historic District

would result in a beneficial impact on vehicular, bicycle, and pedestrian safety in 2020 cannot be made.

AND

(page 434, 3.6-68) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing at one of the three mixed-use development sites as part of Alternative B would minimize the impacts on vehicular, bicycle, and pedestrian safety in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **Alternative C: Triangle One-Way**

#### ***Transportation Improvements***

(page 434, 3.6-68) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Because the proposed design features would improve vehicular, bicycle, and pedestrian safety, implementation of Alternative C transportation improvements on opening day would result in a beneficial impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 434, 3.6-68) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative C would avoid or minimize environmental consequences related to vehicular, bicycle, and pedestrian safety in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### ***Conclusion***

(page 435, 3.6-69) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative C transportation improvements and replacement housing at one or more of the three mixed-use sites would result in a beneficial impact on vehicular, bicycle, and pedestrian safety in 2020* cannot be made.

AND

15-83  
cont.



## TAHOE MEADOWS

### Historic District

(page 435, 3.6-69) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing at one of the three mixed-use development sites as part of Alternative C would minimize the impacts on vehicular, bicycle, and pedestrian safety in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### Alternative D: Project Study Report Alternative 2

##### *Transportation Improvements*

(page 436, 3.6-70) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, because the proposed design features would improve traffic, bicycle, and pedestrian safety, implementation of Alternative D transportation improvements on opening day would result in a beneficial impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 436, 3.6-70) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize environmental consequences related to vehicular, bicycle, and pedestrian safety such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

##### *Conclusion*

(page 436, 3.6-70) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and replacement housing at one or more of the three mixed-use sites would result in a beneficial impact on vehicular, bicycle, and pedestrian safety in 2020* cannot be made.

AND

(page 437, 3.6-71) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing at one of the three mixed-use development sites as part of Alternative D would minimize the impacts on vehicular, bicycle, and* Tahoe Meadows Comments US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS

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cont.

## TAHOE MEADOWS

### Historic District

*pedestrian safety in 2020 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under Alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection.
- Proposed changes to the Linear Park profile as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-83  
cont.

#### **Impact 3.6-9: Impacts on emergency access – 2020 (Opening Day)**

(page 437, 3.6-71) This impact summary fails to include continuously maintaining the Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road.

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
  - Not only will the emergency access at Hwy 50/Lodge Road be required at opening in 2020, but must be maintained throughout construction of any improvements (including construction staging activities) and construction of relocation housing near this location.
  - Exhibit 2.2 (Alternative B) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.

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## TAHOE MEADOWS

### Historic District

- Exhibit 2.3 (Alternative C) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.
- Exhibits 2-4 and 2-11 (Alternative D) show access provided to the Holiday Inn Express, but no Emergency Vehicle Access at Hwy 50/Lodge Road.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles: one vehicle entry point at Hwy 50/Lake Road and two Emergency Vehicle Access points at Hwy 50/Wildwood Ave. and Hwy 50/Lodge Road. There are two additional pedestrian-only access gates but neither can accommodate any type of vehicle.
- Fire evacuation of the 96 homes will require use of all egress routes.
- Emergency Vehicle Access and neighborhood evacuation would be impaired by construction of a median of any height as part of the transportation improvements at the Hwy 50/Lake Road intersection.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

15-84  
cont.

#### NEPA Environmental Consequences:

(page 437, 3.6-71) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *The design features of Alternatives A, B, D, and E would avoid or minimize the impacts on emergency access in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### CEQA/TRPA Impact Determinations:

(page 437, 3.6-71) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Less Than Significant for Alternatives A, B, D, and E* cannot be made.

AND

## TAHOE MEADOWS Historic District

### Alternative B: Triangle (Locally Preferred Action)

#### **Transportation Improvements**

(page 438, 3.6-72) This impact summary fails to include continuously maintaining the Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road.

AND

(page 438, 3.6-72) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Additionally, as required by Caltrans, the TMP for the construction phase of the project would be coordinated with emergency services and all emergency service entities would be notified of any lane or road closures during construction to ensure adequate access for emergency vehicles throughout the construction period* cannot be made.

AND

(page 438, 3.6-72) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Thus, the impact on emergency access from Alternative B transportation improvements would be less than significant for the purposes of CEQA and TRPA* cannot be made.

AND

(page 438, 3.6-72) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the emergency access environmental consequences such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### **Conclusion**

(page 439, 3.6-74) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and replacement housing at Site 3 would result in a less-than-significant impact on emergency access in 2020* cannot be made.

AND

(page 439, 3.6-74) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing at one of the three mixed-use development sites as part of Alternative B would minimize the impacts on emergency access in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

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cont.

## TAHOE MEADOWS Historic District

### Alternative C: Triangle One-Way

#### Transportation Improvements

(page 439, 3.6-73) This impact summary fails to include continuously maintaining the Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road.

AND

(page 439, 3.6-73) Without including uninterrupted emergency access to Tahoe Meadows, the conclusions *This change in circulation patterns would result in increased emergency response times due to indirect emergency access routes for some areas and increased congestion along multiple roadway segments. Thus, this would be a significant impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 439, 3.6-73) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, additional mitigation measures have been incorporated into the transportation improvements included in Alternative C to further reduce to the extent feasible the environmental consequences related to the emergency access* cannot be made.

AND

#### Conclusion

(page 440, 3.6-74) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative C transportation improvements and replacement housing at Site 3 would result in a less-than-significant impact on emergency access in 2020* cannot be made.

AND

(page 440, 3.6-74) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing at one of the three mixed-use development sites as part of Alternative C would minimize the impacts on emergency access in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### Alternative D: Project Study Report (Alternative 2)

#### Transportation Improvements

(page 440, 3.6-74) This impact summary fails to include continuously maintaining the Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road.

AND

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cont.



## TAHOE MEADOWS

### Historic District

(page 440, 3.6-74) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Additionally, as required by Caltrans, the TMP for the construction phase of the project would be coordinated with emergency services and all emergency service entities would be notified of any lane or road closures during construction to ensure adequate access for emergency vehicles throughout the construction period* cannot be made.

AND

(page 440, 3.6-74) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *Emergency access during construction would be subject to all applicable jurisdictional construction rules and regulations and would be addressed on a project specific level during the project permitting process. Thus, the impact on emergency access for Alternative D replacement housing would be less than significant for the purposes of CEQA and TRPA* cannot be made.

AND

#### **Conclusion**

(page 441, 3.6-75) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and replacement housing would result in a less-than-significant impact on emergency access in 2020* cannot be made.

AND

(page 441, 3.6-75) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and replacement housing as part of Alternative D would minimize the impacts on emergency access in 2020 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles.
- Fire evacuation of the 96 homes will require use of all egress routes.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.

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cont.



## TAHOE MEADOWS

### Historic District

- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

15-84  
cont.

#### **Impact 3.6-12: Impacts on intersection operations – 2040 (Design Year)**

The analysis of impacts on roadway segment operations – 2040 (Design Year) fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D.

(page 452, 3.6-86) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Under 2040 design year conditions, improvements under Alternatives B and D transportation improvements and mixed-use development, including replacement housing, would operate intersections at annual average and summer peak-hour LOS C or better and Alternative C transportation improvements and mixed-use development, including replacement housing, would degrade operations at three intersections to unacceptable levels or exacerbate already unacceptable operations* cannot be made.

- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.

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## TAHOE MEADOWS

### Historic District

- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS at the intersection of Hwy/50 Lake Road from hundreds of additional summer peak average day right turns into Tahoe Meadows:
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- The impact is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### NEPA Environmental Consequences:

(Page 452, 3.6-86) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *The Tahoe Meadows Comments US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS*

15-85  
cont.

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## TAHOE MEADOWS

### Historic District

*design features of Alternatives B, D, and E would avoid or minimize the effects on intersection operations in 2040 such that no additional mitigation measures are needed or feasible to implement; Mitigation Measure 3.6-12 has been incorporated into Alternative C to further reduce to the extent feasible the environmental consequences related to impacts on intersection operations in 2040; cannot be made.*

AND

#### **CEQA/TRPA Impact Determinations:**

(Page 452, 3.6-86) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Less than Significant for Alternatives B, D, and E; Less Than Significant for Alternative C after implementation of Mitigation Measure 3.6-12 cannot be made.*

AND

#### **Alternative B: Triangle (Locally Preferred Action)**

##### ***Transportation Improvements***

(page 453, 3.6-87) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alternative B transportation improvements would not degrade operations to unacceptable levels or exacerbate already unacceptable operations at the intersections; therefore, the impact would be less than significant for the purposes of CEQA and TRPA cannot be made.*

15-85  
cont.

AND

(page 453, 3.6-87) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the impacts on intersection operations in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

##### ***Conclusion***

(page 463, 3.6-97) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and mixed-use development, including replacement housing, would result in a less-than-significant impact on 2040 intersection operations cannot be made.*

AND

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(page 463, 3.6-97) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative B would minimize the impacts on intersection operations in 2040 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **Alternative C: Triangle One-Way**

#### ***Transportation Improvements***

(page 463, 3.6-97) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *As shown in Table 3.6-22, Alternative C transportation improvements for 2040 design year conditions are projected to degrade operations to unacceptable levels or exacerbate already unacceptable operations at two intersections: New US 50/Pioneer Trail/Old US 50 ... and ... New US 50/Lake Parkway/Old US 50* cannot be made.

AND

(page 463, 3.6-97) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Because two study area intersections would operate at unacceptable LOS F under 2040 design year conditions for Alternative C transportation improvements, either degrading from an acceptable LOS or substantially exacerbating already unacceptable operations, this impact would be significant for the purposes of CEQA and TRPA* cannot be made.

AND

(page 463, 3.6-97) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, additional mitigation measures have been incorporated into the transportation improvements included in Alternative C to further reduce to the extent feasible the impacts on intersection operations in 2040* cannot be made.

- The adverse impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The adverse impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection to accommodate the widening of Hwy 50 as shown in Appendix N under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.

15-85  
cont.

## TAHOE MEADOWS

### Historic District

- The draft EIR/EIS/EIS fails to consider the intensified combined impact of these changes at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The draft EIR/EIS/EIS fails to identify solutions and mitigations for these adverse impacts.
- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections as well as the safety of vehicles, bicyclists, and pedestrians.
- The impact is Potentially Significant.
- Maintaining the left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at Hwy 50/Lake Road intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### **Conclusion**

(page 464, 3.6-98) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative C transportation improvements and mixed-use development, including replacement housing, would result in a significant impact on 2040 intersection operations.*

- Agreed that the impact of the Alternative C (including mitigation measures) transportation improvements will be significant for the purposes of CEQA and TRPA, but the EIR/EIS/EIS must include analysis of the changes to Hwy 50/Lake Road to fully describe the impact.

(page 464, 3.6-98) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, additional mitigation measures have been incorporated into construction of the Alternative C transportation improvements and mixed-use development, including replacement housing, to further reduce to the extent feasible the impacts on 2040 intersection operations cannot be made.*

AND

#### **Alternative D: Project Study Report Alternative 2**

##### **Transportation Improvements**

(page 464, 3.6-98) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alternative D transportation improvements would not degrade operations to unacceptable levels or exacerbate already unacceptable operations at the intersections;* Tahoe Meadows Comments US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS

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cont.

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### Historic District

*therefore, this impact would be less than significant for the purposes of CEQA and TRPA cannot be made.*

AND

(page 464, 3.6-98) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize the impacts on intersection operations in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

#### **Conclusion**

(page 465, 3.6 -99) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion Without analysis of the impact of intersection changes at Hwy 50/Lake Road, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and mixed-use development, including replacement housing, would result in a less-than-significant impact on 2040 intersection operations cannot be made.*

AND

(page 465, 3.6 -99) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative D would minimize the impacts on intersection operations in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

- The adverse impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The adverse impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection to accommodate the widening of Hwy 50 as shown in Appendix N under alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified combined impact of these changes at the Hwy 50/Lake Road intersection under Alternatives B, C (including mitigation measures) and D.
- The draft EIR/EIS/EIS fails to identify solutions and mitigations for these adverse impacts.

15-85  
cont.

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### Historic District

- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections as well as the safety of vehicles, bicyclists, and pedestrians.
- The impact is Potentially Significant.
- Maintaining the left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at Hwy 50/Lake Road intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-85  
cont.

#### **Impact 3.6-13: Impacts on roadway segment operations – 2040 (Design Year)**

The analysis of impacts on roadway segment operations – 2040 (Design Year) fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D.

(page 466, 3.6-100) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion) *Under 2040 design year conditions, Alternatives B and D transportation improvements and mixed-use development, including replacement housing, and Alternative E would result in acceptable roadway segment LOS during annual average and summer peak hours cannot be made.*

15-86

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D.
- The proposed changes adversely affect the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail as well as the safety of vehicles, bicyclists, and pedestrians at the intersection of Hwy 50/Lake Road.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation

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measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.

- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- The impact is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### NEPA Environmental Consequences:

(page 466, 3.6-100) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The* Tahoe Meadows Comments US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS

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cont.

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*design features of Alternatives B, D, and E would avoid or minimize the environmental consequences related to roadway segment operations in 2040; Mitigation Measure 3.6-13 has been incorporated into Alternative C to further reduce to the extent feasible the environmental consequences related to roadway segment operations in 2040; There would be no mechanism by which to implement or enforce avoidance or mitigation measures to minimize Alternative A impacts on roadway segment operations in 2040 cannot be made.*

AND

#### **CEQA/TRPA Impact Determinations:**

(page 466, 3.6-100) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Less Than Significant for Alternatives B, D, and E; Significant and Unavoidable for Alternative A; and Significant and Unavoidable for Alternative C with implementation of Mitigation Measure 3.6-13 cannot be made.*

AND

#### **Alternative B: Triangle (Locally Preferred Action)**

##### ***Transportation Improvements***

(page 466, 3.6-100) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *As shown in Table 3.6-24, all roadway study segments under Alternative B transportation improvements are projected to operate at acceptable LOS under annual average and summer peak-hour conditions for the 2040 design year cannot be made.*

15-86  
cont.

AND

(page 466, 3.6-100) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, Alternative B transportation improvements would not degrade operations to unacceptable levels or exacerbate already unacceptable operations for any roadway segments under 2040 design year conditions, and therefore this impact would be less than significant for the purposes of CEQA and TRPA cannot be made.*

AND

(page 466, 3.6-100) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the environmental consequences related to 2040 roadway segment operations such that no additional mitigation measures are needed or feasible to implement cannot be made.*

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AND

### **Conclusion**

(page 467, 3.6-101) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and mixed-use development, including replacement housing, would result in a less-than-significant impact on 2040 roadway segment operations* cannot be made.

AND

(page 467, 3.6-101) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative B would minimize the environmental consequences related to 2040 roadway segment operations such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **Alternative C: Triangle One-Way**

#### **Transportation Improvements**

(page 467, 3.6-101) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *As shown in Table 3.6-24, Alternative C transportation improvements for the 2040 design year is projected to degrade operations to unacceptable levels along two roadway segments: Westbound Old US 50 between Pioneer Trail and Park Avenue (and) One-way Eastbound US 50 between Park Avenue and Lake Parkway* cannot be made.

AND

(page 468, 3.6-102) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For these two roadway segments, Alternative C would result in a significant impact during the summer peak hour. Therefore, Alternative C transportation improvements during the 2040 design year would result in a significant impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 468, 3.6-102) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, additional mitigation measures have been incorporated into the*

15-86  
cont.

## TAHOE MEADOWS

### Historic District

*transportation improvements included in Alternative C to further reduce to the extent feasible the environmental consequences related to roadway segment operations in 2040 cannot be made.*

AND

#### **Conclusion**

(page 468, 3.6-102) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative C transportation improvements and mixed-use development, including replacement housing, at one or more of the mixed-use development sites would result in a significant impact on roadway segment operations in 2040 cannot be made.*

AND

(page 468, 3.6-102) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, additional mitigation measures have been incorporated into construction of the Alternative C transportation improvements and mixed-use development, including replacement housing, to further reduce to the extent feasible the environmental consequences related to roadway segment operations in 2040 cannot be made.*

AND

#### **Alternative D: Project Study Report Alternative 2**

##### **Transportation Improvements**

(page 469, 3.6-103) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *As shown in Table 3.6-24, all roadway study segments under Alternative D transportation improvements are projected to operate at annual average and summer peak-hour LOS D or better under 2040 design year conditions. Thus, Alternative D transportation improvements would not degrade operations to unacceptable levels or exacerbate already unacceptable operations for any roadway segments, and therefore this impact would be less than significant for the purposes of CEQA and TRPA cannot be made.*

AND

(page 469, 3.6-103) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize the environmental consequences related to 2040 roadway segment operations such that no additional mitigation measures are needed or feasible to implement cannot be made.*

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cont.



## TAHOE MEADOWS Historic District

AND

### **Conclusion**

(page 470, 3.6-104) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and mixed-use development, including replacement housing, would result in a less-than-significant impact on 2040 roadway segment operations* cannot be made.

AND

(page 470, 3.6-104) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative D would minimize the environmental consequences related to 2040 roadway segment operations such that no additional mitigation measures are needed or feasible to implement* cannot be made.

- The EIR/EIS/EIS analysis must include the adverse impact on the LOS of the westbound road segment between Hwy 50/Lake Road and Hwy 50/Pioneer Trail due to hundreds of additional summer peak average day right in turns into Tahoe Meadows at Hwy/50 Lake Road to replace the eliminated left in turn.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N)
  - The reduced width eliminates the space for a vehicle to wait between the street and the shared path. Cars waiting to enter Tahoe Meadows will have to queue in the westbound traffic lane of Hwy 50.
  - Vehicles trying to get out of fast-moving traffic on Hwy 50 may choose to block the Linear Park shared path instead of queuing in the westbound traffic lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- The impact is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

15-86  
cont.

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### Historic District

- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

15-86  
cont.

#### **Impact 3.6-14: Impacts on vehicle miles of travel – 2040 (Design Year)**

The analysis of impacts on vehicle miles traveled fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D.

(page 470, 3.6-104) The impact on VMT of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road under alternatives B, C (including mitigation measures) and D is not identified.

- The traffic studies and traffic analysis in this draft EIR/EIS/EIS are **inadequate** because they fail to include the proposed change in access to Tahoe Meadows at Hwy 50/Lake Road under proposed Alternatives B, C (including mitigation measures) and D.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
  - Information about the number of vehicle trips at Hwy 50/Lake Road was made available to the project team in 2013 yet the study fails to include the loss of the left in/left out turning motions at Hwy 50/Lake Road for the Tahoe Meadows neighborhood of 96 homes.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits eliminate left in/left out turns at Hwy 50/Lake Road for vehicles entering or leaving Tahoe Meadows.
  - Eliminating left in/left out access will result in hundreds of additional summer peak average day U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to accomplish the lost left in/left out turns.
  - It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible. This would greatly increase the VMT for trips to and from Tahoe Meadows.
- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.

15-87

## TAHOE MEADOWS Historic District

- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

### NEPA Environmental Consequences:

(page 470, 3.6-104) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives A, B, C, D, and E would avoid or minimize the impacts on VMT in 2040 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### CEQA/TRPA Impact Determinations:

(page 470, 3.6-104) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *the CEQA/TRPA Impact Determination is Beneficial for Alternatives B, C, and D* cannot be made.

AND

### Alternative B: Triangle (Locally Preferred Action)

#### *Transportation Improvements*

(page 473, 3.6-107) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alternative B transportation improvements would have a beneficial impact on VMT under 2040 design year conditions for the purposes of CEQA and TRPA* cannot be made.

AND

(page 473, 3.6-107) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the 2040 VMT environmental consequences such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

15-87  
cont.

## TAHOE MEADOWS

### Historic District

#### **Conclusion**

(page 474, 3.6-108) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and mixed-use development, including replacement housing, would result in a beneficial impact on 2040 VMT cannot be made.*

AND

(page 474, 3.6-108) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative B would avoid or minimize the 2040 VMT environmental consequences such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

#### **Alternative C: Triangle One-Way**

##### **Transportation Improvements**

(page 475, 3.6-109) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Thus, Alternative C transportation improvements would support the RTP's beneficial impact on VMT per capita and achievement of the Regional Plan's VMT requirements for the purposes of CEQA and TRPA cannot be made.*

AND

(page 475, 3.6-109) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative C would avoid or minimize the 2040 VMT environmental consequences such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

(page 475, 3.6-109) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative C would avoid or minimize the 2040 VMT environmental consequences such that no additional mitigation measures are needed or feasible to implement cannot be made.*

15-87  
cont.

## TAHOE MEADOWS Historic District

AND

### **Conclusion**

(page 476, 3.6-110) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative C transportation improvements and mixed-use development, including replacement housing, would result in a beneficial impact on 2040 VMT* cannot be made.

AND

(page 476, 3.6-110) Without analysis of the impact of intersection changes at Hwy 50/Lake Road, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative C would avoid or minimize the 2040 VMT environmental consequences such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **Alternative D: Project Study Report Alternative 2**

#### **Transportation Improvements**

(page 476, 3.6-110) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alternative D transportation improvements would support the RTP's beneficial impact on VMT for the purposes of CEQA and TRPA* cannot be made.

AND

(page 476, 3.6-110) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize the 2040 VMT environmental consequences such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

### **Conclusion**

(page 477, 3.6-111) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and mixed-use development, including replacement housing, would result in a beneficial impact on 2040 VMT* cannot be made.

AND

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cont.

## TAHOE MEADOWS

### Historic District

(page 477, 3.6-111) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative D would avoid or minimize the 2040 VMT environmental consequences such that no additional mitigation measures are needed or feasible to implement* cannot be made.

- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits eliminate left in/left out turns at Hwy 50/Lake Road for vehicles entering or leaving Tahoe Meadows.
  - Eliminating left in/left out access will result in hundreds of additional summer peak average day U-turns at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. to accomplish the lost left in/left out turns.
- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.
- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.
- A mitigation measure that maintains the left in/left out turns at this intersection must be included.

15-87  
cont.

#### **Impact 3.6-15: Impacts on bicycle and pedestrian facilities – 2040 (Design Year)**

The analysis of impacts on bicycle and pedestrian facilities fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road and the redesign of the Linear Park under alternatives B, C (including mitigation measures) and D.

(page 477, 3.6-111) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Because of their design, Alternatives B, C, D, and E would not disrupt or interfere with existing or planned bicycle/pedestrian facilities; rather, they would enhance the existing infrastructure and create a bicycle and pedestrian network with enhanced connectivity. Furthermore, Alternatives B, C, D, and E would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems* cannot be made.

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- The draft EIR/EIS/EIS is **inadequate** because it fails to include the proposed changes at Hwy 50/Lake Road under proposed Alternatives B, C (including mitigation measures) and D.

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- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile to accommodate the widening of Hwy 50 as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road as shown in Appendix N, trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road as shown in Appendix N, all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road as shown in Appendix N eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.
- Proposed changes to the Linear Park profile as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.

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cont.

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### Historic District

- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

#### **NEPA Environmental Consequences:**

(page 477, 3.6-111) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives B, C, D, and E would avoid or minimize the impacts on bicycle and pedestrian facilities in 2040 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

#### **CEQA/TRPA Impact Determinations:**

(page 477, 3.6-111) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Beneficial for Alternatives B, C, D, and E* cannot be made.

AND

#### **Alternative B: Triangle (Locally Preferred Action)**

##### ***Transportation Improvements***

(page 478, 3.6-112) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Alternative B would not disrupt or interfere with the implementation of planned bicycle/pedestrian facilities, nor would it result in unsafe conditions for bicyclists or pedestrians. Furthermore, Alternative B would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems. Therefore, Alternative B transportation improvements would have a beneficial impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 478, 3.6-112) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the impacts on bicycle and pedestrian facilities in 2040 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

##### ***Conclusion***

(page 478, 3.6-112) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For Tahoe Meadows Comments US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS*

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cont.

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*the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and mixed-use development, including replacement housing, would result in a beneficial impact on bicycle and pedestrian facilities in 2040 cannot be made.*

AND

*(page 478, 3.6-112) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative B would minimize the impacts on bicycle and pedestrian facilities in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

### **Alternative C: Triangle One-Way**

#### **Transportation Improvements**

*(page 479, 3.6-113) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions Alternative C would not disrupt or interfere with the implementation of planned bicycle/pedestrian facilities, nor would it result in unsafe conditions for bicyclists or pedestrians. Furthermore, Alternative C would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems. Therefore, Alternative C transportation improvements would have a beneficial impact for the purposes of CEQA and TRPA cannot be made.*

AND

*(page 479, 3.6-113) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion For the purposes of NEPA, the design features of the transportation improvements included in Alternative C would avoid or minimize the impacts on bicycle and pedestrian facilities in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

#### **Conclusion**

*(page 479, 3.6-113) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion For the purposes of CEQA and TRPA, taken as a whole, the Alternative C transportation improvements and mixed-use development, including replacement housing, would result in a beneficial impact on bicycle and pedestrian facilities in 2040 cannot be made.*

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cont.

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AND

(page 479, 3.6-113) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative C would minimize the impacts on bicycle and pedestrian facilities in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

### Alternative D: Project Study Report Alternative 2

#### ***Transportation Improvements***

(page 480, 3.6-114) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusions *Alternative D would not disrupt or interfere with the implementation of planned bicycle/pedestrian facilities, nor would it result in unsafe conditions for bicyclists or pedestrians. Furthermore, Alternative D would not create an inconsistency with any adopted policies related to bicycle or pedestrian systems. Therefore, Alternative D transportation improvements would have a beneficial impact for the purposes of CEQA and TRPA cannot be made.*

AND

(page 480, 3.6-114) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize the impacts on bicycle and pedestrian facilities in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

#### ***Conclusion***

(page 480, 3.6-114) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and mixed-use development, including replacement housing, would result in a beneficial impact on bicycle and pedestrian facilities in 2040 cannot be made.*

AND

(page 480, 3.6-114) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For*

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cont.

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*the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative D would minimize the impacts on bicycle and pedestrian facilities in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

- The combined changes to the Hwy 50/Lake Road intersection and the drastic reduction in the width of the Linear Park at that location are not beneficial.
- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under Alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection.
- Proposed changes to the Linear Park profile as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

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cont.

### **Impact 3.6-18: Impacts on vehicular, bicycle, and pedestrian safety – 2040 (Design Year)**

The analysis of impacts on vehicular, bicycle, and pedestrian safety fails to consider the significant impacts of proposed changes to access to the Tahoe Meadows neighborhood at Hwy 50/ Lake Road and the redesign of the Linear Park under alternatives B, C (including mitigation measures) and D.

(page 486, 3.6-120) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Alternatives B, C, D, and E would enhance the existing infrastructure and improve*

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*safety throughout the vehicular, bicycle, and pedestrian network within the study area cannot be made.*

- The draft EIR/EIS/EIS is **inadequate** because it fails to include the proposed changes at Hwy 50/Lake Road under proposed Alternatives B, C (including mitigation measures) and D.
- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign as shown in Appendix N to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile to accommodate the widening of Hwy 50 as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road as shown in Appendix N, trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road as shown in Appendix N, all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road as shown in Appendix N eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

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cont.

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- Proposed changes to the Linear Park profile as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

### NEPA Environmental Consequences:

(page 486, 3.6-120) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *The design features of Alternatives B, C, D, and E would avoid or minimize the impacts on vehicular, bicycle, and pedestrian safety in 2040* cannot be made.

AND

### CEQA/TRPA Impact Determinations:

(page 486, 3.6-120) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Beneficial for Alternatives B, C, D, and E* cannot be made.

AND

### Alternative B: Triangle (Locally Preferred Action)

#### Transportation Improvements

(page 486, 3.6-120) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Therefore, Alternative B transportation improvements would have a beneficial impact for the purposes of CEQA and TRPA* cannot be made.

AND

(page 487, 3.6-121) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the effects on vehicular, bicycle, and pedestrian safety in 2040 such that no additional mitigation measures are needed or feasible to implement* cannot be made.

AND

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cont.



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#### **Conclusion**

(page 487, 3.6-121) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and mixed-use development, including replacement housing, would result in a beneficial impact on vehicular, bicycle, and pedestrian safety in 2040 cannot be made.*

AND

(page 487, 3.6-121) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative B would minimize the effects on vehicular, bicycle, and pedestrian safety in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

#### **Alternative C: Triangle One-Way**

##### **Transportation Improvements**

(page 488, 3.6-122) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Therefore, Alternative C transportation improvements would have a beneficial impact for the purposes of CEQA and TRPA cannot be made.*

AND

(page 488, 3.6-122) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative C would avoid or minimize the effects on vehicular, bicycle, and pedestrian safety in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

#### **Conclusion**

(page 488, 3.6-122) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative C transportation improvements and mixed-use development, including replacement housing, would*

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cont.

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*result in a beneficial impact on vehicular, bicycle, and pedestrian safety in 2040 cannot be made.*

AND

(page 488, 3.6-122) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development, including replacement housing, as part of Alternative C would minimize the effects on vehicular, bicycle, and pedestrian safety in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

### **Alternative D: Project Study Report Alternative 2**

#### ***Transportation Improvements***

(page 489, 3.6-123) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *Therefore, Alternative D transportation improvements would have a beneficial impact for the purposes of CEQA and TRPA cannot be made.*

AND

(page 489, 3.6-123) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize the effects on vehicular, bicycle, and pedestrian safety in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made*

AND

#### ***Conclusion***

(page 490, 3.6-124) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and mixed-use development, including replacement housing, would result in a beneficial impact on vehicular, bicycle, and pedestrian safety in 2040 cannot be made.*

AND

(page 490, 3.6-124) Without analysis of the impact of intersection changes at Hwy 50/Lake Road and the redesign of the Linear Park in that location, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation*

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cont.

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*improvements and mixed-use development, including replacement housing, as part of Alternative D would minimize the effects on vehicular, bicycle, and pedestrian safety in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

- The impact of proposed traffic operations changes to the intersection of Hwy 50/Lake Road under Alternatives B, C (including mitigation measures) and D is not included or analyzed in this draft EIR/EIS/EIS.
- The impact of proposed Linear Park redesign at the Hwy 50/Lake Road intersection as shown in Appendix N to accommodate the widening of Hwy 50 is not included or analyzed in this draft EIR/EIS/EIS.
- The draft EIR/EIS/EIS fails to consider the intensified impact of combining the intersection changes and Linear Park redesign at the Hwy 50/Lake Road intersection.
- The combined changes to the intersection of Hwy 50/Lake Road and the drastically reduced Linear Park profile as shown in Appendix N would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection.
- Proposed changes to the Linear Park profile as shown in Appendix N to accommodate the widening of Hwy 50 would degrade the bicycle/pedestrian facility below the Class I bicycle facility minimums illustrated in Appendix I, Figure 2 where the minimums are shown with an additional wide vegetated buffer between the facility and the road.
- The impact is Significant.
- A mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path at Hwy 50/Lake Road must be included.

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cont.

#### **Impact 3.6-19: Impacts on emergency access – 2040 (Design Year)**

(page 490, 3.6-124) This impact summary fails to include continuously maintaining the Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road.

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
  - Not only will the emergency access at Hwy 50/Lodge Road be required at opening in 2020, but must be maintained throughout construction of any improvements (including construction staging activities) and construction of relocation housing near this location.
  - Exhibit 2.2 (Alternative B) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road

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### Historic District

indicating that the access would be blocked perhaps for weeks or months at a time.

- Exhibit 2.3 (Alternative C) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.
- Exhibits 2-4 and 2-11 (Alternative D) show access provided to the Holiday Inn Express, but no Emergency Vehicle Access at Hwy 50/Lodge Road.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles: one vehicle entry point at Hwy 50/Lake Road and two Emergency Vehicle Access points at Hwy 50/Wildwood Ave. and Hwy 50/Lodge Road. There are two additional pedestrian-only access gates but neither can accommodate any type of vehicle.
- Fire evacuation of the 96 homes will require use of all egress routes.
- Emergency Vehicle Access and neighborhood evacuation would be impaired by construction of a median of any height as part of the transportation improvements at the Hwy 50/Lake Road intersection.
- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

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cont.

#### NEPA Environmental Consequences:

(page 490, 3.6-124) Without including uninterrupted emergency access to Tahoe Meadows, the conclusions *The design features of Alternatives B, D, and E would avoid or minimize the environmental consequences related to emergency access in 2040 such that no additional mitigation measures are needed or feasible to implement; Mitigation Measure 3.6-19 has been incorporated into Alternative C to further reduce to the extent feasible the environmental consequences related to impacts on emergency access in 2040* cannot be made.

AND

#### CEQA/TRPA Impact Determinations:

(page 490, 3.6-124) Without including uninterrupted emergency access to Tahoe Meadows, the conclusions *Beneficial for Alternative E; Less Than Significant for Alternatives B and D (and) Significant and Unavoidable for Alternative C with implementation of Mitigation Measure 3.6-19* cannot be made.

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## TAHOE MEADOWS Historic District

AND

### Alternative B: Triangle (Locally Preferred Action)

#### *Transportation Improvements*

(page 491, 3.6-125) Without including uninterrupted emergency access to Tahoe Meadows, the conclusions *Alternative B would maintain current emergency access routes and points to existing land uses in the study area and even with the narrowing of existing US 50, the improved traffic flow would at the least maintain emergency response time. Thus, the impact on emergency access for Alternative B transportation improvements would be less than significant for the purposes of CEQA and TRPA cannot be made.*

AND

(page 491, 3.6-125) Without including uninterrupted emergency access to Tahoe Meadows, the conclusions *For the purposes of NEPA, the design features of the transportation improvements included in Alternative B would avoid or minimize the impacts on emergency access in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

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cont.

AND

#### *Conclusion*

(page 491, 3.6-125) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative B transportation improvements and mixed-use development would result in a less-than-significant impact on emergency access in 2040 cannot be made.*

AND

(page 491, 3.6-125) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development as part of Alternative B would minimize the impacts on emergency access in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

### Alternative C: Triangle One-Way

#### *Conclusion*

(page 492, 3.6-126) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, additional mitigation measures have been incorporated into the transportation improvements included in Alternative C to further reduce to the extent feasible the environmental consequences related to impacts on emergency access in 2040 cannot be made.*

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## TAHOE MEADOWS Historic District

AND

### Alternative D: Project Study Report (Alternative 2)

#### **Transportation Improvements**

(page 492, 3.6-126) Without including uninterrupted emergency access to Tahoe Meadows, the conclusions *Alternative D would maintain current emergency access routes and points to existing land uses in the study area and even with the narrowing of Old US 50, the improved traffic flow would at the least maintain emergency response time. Thus, the impact on emergency access for Alternative D transportation improvements would be less than significant for the purposes of CEQA and TRPA cannot be made.*

AND

(page 492, 3.6-126) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, the design features of the transportation improvements included in Alternative D would avoid or minimize the impacts on emergency access in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

AND

#### **Conclusion**

(page 493, 3.6-127) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of CEQA and TRPA, taken as a whole, the Alternative D transportation improvements and mixed-use development would result in a less-than-significant impact on emergency access in 2040 cannot be made.*

AND

(page 493, 3.6-127) Without including uninterrupted emergency access to Tahoe Meadows, the conclusion *For the purposes of NEPA, taken as a whole, the design features of the transportation improvements and mixed-use development as part of Alternative D would minimize the impacts on emergency access in 2040 such that no additional mitigation measures are needed or feasible to implement cannot be made.*

- The draft EIR/EIS/EIS is **inadequate** because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including mitigation measures) and D.
- The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.
- Tahoe Meadows has extremely limited access for emergency vehicles.
- Fire evacuation of the 96 homes will require use of all egress routes.

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cont.



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### Historic District

- The impact is Significant as it affects the life safety of the Tahoe Meadows neighborhood.
- The EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

15-90  
cont.

## APPENDIX I

### **US 50/South Shore Community Revitalization (Stateline) Project – Caltrans Project Report Traffic Operations Analysis Update**

This traffic operations analysis update is **inadequate** because it fails to consider the traffic generated by the Tahoe Meadows Historic District, a significant source of daily vehicle trips in the analysis of intersection operations, road segment operations, and vehicle miles traveled.

- The proposed changes in access to Tahoe Meadows at Hwy 50/Lake Road and the redesign of the Linear Park in that location to accommodate the widening of Hwy 50 as shown in Appendix N under proposed Alternatives B, C (including mitigation measures) and D create significant safety hazards.
- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. In July 2013 (excluding heavily traveled July 4th when the gate was locked open) the entry gate opened 7,338 times (this information provided to project staff in 2013). The number of vehicles entering Tahoe Meadows was considerably higher than the gate count because during busy periods more than one vehicle enters for each entry gate operation. And, of course those vehicles all exit as well producing well in excess of 15,000 vehicle trips per peak month in July 2013 at this intersection.
- The July 2013 Tahoe Meadows' Hwy 50/Lake Road gate entry information was submitted in September 2013 as part of a Community Review Committee written comment pointing out the need to actively address the left in/left out access issue.

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## TAHOE MEADOWS

### Historic District

- Since that time, with the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- The EIR/EIS/EIS analysis must include the adverse impact on LOS of the westbound Hwy 50 road segment between Hwy 50/Pioneer Trail and Hwy/50 Lake Road from hundreds of additional summer peak average day right turns into Tahoe Meadows.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will

15-91  
cont.

## TAHOE MEADOWS

### Historic District

block the Linear Park shared path while waiting for a break in oncoming traffic.

This creates a safety hazard affecting bicyclists and pedestrians.

- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.

15-91  
cont.

#### EXISTING TRANSPORTATION FACILITIES

(page 6 pdf, 5 report) **Local Roads** within/near the project study area include *Chonokis Road, Moss Road, and Echo Road*.

A significant omission from the roads considered in the traffic analysis is Lake Road which provides the only access to the Tahoe Meadows Historic District.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Vehicles entering and exiting Tahoe Meadows at Hwy 50/Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- As the sole access for 96 homes in the Tahoe Meadows Historic District, Lake Road represents a significant source of vehicle trips. With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.

15-92

#### EXISTING CONDITIONS TRAFFIC OPERATIONS

##### **INTERSECTION OPERATIONS**

(page 17 pdf, 16 report) This section is **inadequate** because fails to consider the traffic generated by the Tahoe Meadows Historic District, a significant source of daily vehicle trips in the analysis of intersection operations.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes. In July 2013 (excluding heavily traveled July 4th when the gate was locked open) the entry gate opened 7,338 times (this information provided to project staff in 2013). The number of vehicles entering Tahoe Meadows was considerably higher than the gate count because during busy periods more than one vehicle enters for each entry gate operation. And, of course those vehicles all exit as well producing well in excess of 15,000 vehicle trips per peak month in July 2013 at this intersection.
- The July 2013 Tahoe Meadows' Hwy 50/Lake Road gate entry information was submitted in September 2013 as part of a Community Review Committee written comment pointing out the need to actively address the left in/left out access issue.

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## TAHOE MEADOWS

### Historic District

- Since that time, with the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.

15-93  
cont.

#### **ROADWAY OPERATIONS**

(page 18 pdf, 17 report) This section is **inadequate** because fails to consider the traffic generated by the Tahoe Meadows Historic District, a significant source of daily vehicle trips in the analysis of intersection operations.

- With the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Elimination of left in/left out turns at Hwy 50/Lake Road will significantly impact roadway operations on the westbound travel lanes of Hwy 50 between Hwy 50/Pioneer Trail and Hwy 50/Lake Road. However, no effort is made in this report to quantify the existing conditions on that segment.

15-94

#### **PROJECT DESCRIPTION**

##### **Alternatives**

##### ***Alternative B (Triangle Alternative):***

(page 19 pdf, 18 report) This description fails to include the proposed changes to the intersection of Hwy 50/Lake Road which would eliminate the left in/left out turns and drastically reduce the width of the Linear Park in this location.

##### ***Alternative C (Triangle One-Way Alternative):***

(page 20 pdf, 19 report) This description fails to include the proposed changes to the intersection of Hwy 50/Lake Road which would eliminate the left in/left out turns and drastically reduce the width of the Linear Park in this location.

##### ***Alternative D (PSR Alternative):***

(page 21 pdf, 20 report) This description fails to include the proposed changes to the intersection of Hwy 50/Lake Road which would eliminate the left in/left out turns and drastically reduce the width of the Linear Park in this location.

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## TAHOE MEADOWS

### Historic District

#### FUTURE-YEAR TRAFFIC FORECASTS

(page 22 pdf, 21 report) The forecasts of future year traffic (both 2020 and 2040) for Alternatives B, C and D are **inadequate** because they fail to include the significant impact of changes at the Hwy 50/Lake Road intersection.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes.
  - In July 2013 (excluding heavily traveled July 4th when the gate was locked open) the entry gate opened 7,338 times (this information provided to project staff in 2013). The number of vehicles entering Tahoe Meadows was considerably higher than the gate count because during busy periods more than one vehicle enters for each entry gate operation. And, of course those vehicles all exit as well producing well in excess of 15,000 vehicle trips per peak month in July 2013 at this intersection.
  - The July 2013 Tahoe Meadows' Hwy 50/Lake Road gate entry information was submitted in September 2013 as part of a Community Review Committee written comment pointing out the need to actively address the left in/left out access issue.
  - Since that time, with the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by:
  - reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
  - drastically reducing the width of the Linear Park in this location
- The proposed changes affect not just LOS at the intersection of Hwy 50/Lake Road but the LOS of other study area intersections and road segments as well as the safety of vehicles, bicyclists, and pedestrians.
- The forecasts show minimal left turn lane motions at Hwy 50/Pioneer Trail because the analysis fails to include the significant traffic that will be added with the Hwy 50/Lake Road changes. The forecasts do not consider the impact on the intersection of Hwy 50/Wildwood Ave at all.

15-96



## TAHOE MEADOWS Historic District

- The analysis must include the adverse impact on LOS and saturation flow rate of hundreds of summer peak average day Tahoe Meadows vehicle trips required to make a U-turn at Hwy 50/Pioneer Trail to replace the existing left in turns at Hwy 50/Lake Road.
- U-turn traffic moves more slowly than simple left turns so the impact on intersection operations may be significant.
- The additional U-turn traffic should be included in the future-year traffic forecasts.
- It is unclear from the draft EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including mitigation measures) and D. If not, the design of Alternatives B, C (including mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.
- The analysis fails to include the adverse impact on LOS of hundreds of summer peak average day Tahoe Meadows vehicles required to make a U-turn at Hwy 50/Wildwood Ave. to replace the existing left out turns at Hwy 50/Lake Road.
- The analysis fails to include the adverse impact on LOS of the westbound Hwy 50 road segment between Hwy 50/Pioneer Trail and Hwy/50 Lake Road from hundreds of additional summer peak average day right turns into Tahoe Meadows.
  - The requirement to access Tahoe Meadows only by right turn will cause stopped traffic to queue in the westbound travel lane of Hwy 50 while vehicles wait for the car ahead to use the keypad to access the Tahoe Meadows gate.
  - This creates a significant hazard of rear-end collisions.
- The rear-end collision hazard is intensified by drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N) to eliminate the space for a vehicle to wait between the street and the shared path.
- By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. These vehicles may partially block the Hwy 50 westbound lane. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
- By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road (as shown in Appendix N), all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
- The adverse impact on future traffic operations is Potentially Significant.

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cont.

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## TAHOE MEADOWS

### Historic District

- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.

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cont.

#### VMT ANALYSIS

(page 44 pdf, 43 report) The forecasts of future year Vehicles Miles Traveled (both 2020 and 2040) for Alternatives B, C and D are **inadequate** because they fail to include the significant impact of changes at the Hwy 50/Lake Road intersection.

- The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.
- Lake Road (a private road) is the sole access point for the entire Tahoe Meadows neighborhood of 96 homes.
  - In July 2013 (excluding heavily traveled July 4th when the gate was locked open) the entry gate opened 7,338 times (this information provided to project staff in 2013). The number of vehicles entering Tahoe Meadows was considerably higher than the gate count because during busy periods more than one vehicle enters for each entry gate operation. And, of course those vehicles all exit as well producing well in excess of 15,000 vehicle trips per peak month in July 2013 at this intersection.
  - The July 2013 Tahoe Meadows' Hwy 50/Lake Road gate entry information was submitted in September 2013 as part of a Community Review Committee written comment pointing out the need to actively address the left in/left out access issue.
  - Since that time, with the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. Adding the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 36,000 total vehicle trips in the peak summer season.
- Vehicles entering and exiting Tahoe Meadows at Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.
- Alternatives B, C (including mitigation measures) and D as shown in the draft EIR/EIS/EIS exhibits adversely impact the Tahoe Meadows neighborhood's access at Hwy 50/Lake Road by reconfiguring Hwy 50 to eliminate the left in/left out turns for vehicles entering or leaving Tahoe Meadows
- The need to travel in the wrong direction, wait at a traffic light to make a U-Turn, and return past the original left turn point increases the VMT for each of those hundreds of trips and for the overall project.
- The increase in VMT due to the elimination left in / left out turns at Hwy 50/Lake Road should be included in the EIR/EIS/EIS analysis.
- The adverse impact on VMT is Potentially Significant.
- Maintaining left in/left out turns at Hwy 50/Lake Road is feasible.

15-97

#### Appendix N

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## TAHOE MEADOWS

### Historic District

#### Linear Park Exhibits

Proposed changes to the Linear Park profile under Alternatives B, C and D as shown in Appendix N are unacceptable because they create significant safety hazards for vehicles, bicyclists and pedestrians

- Proposed changes to the Linear Park profile would significantly degrade the bicycle/pedestrian facilities creating significant hazards to Linear Park users at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road, trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road, all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- Proposed changes to the Linear Park profile under Alternatives B, C and D would significantly degrade bicycle/pedestrian user safety within the Linear Park in areas where buffers are reduced below the Class I bicycle facility minimums as illustrated in Appendix I, Figure 2.
  - In Appendix I, Figure 2 the minimums are shown with an additional wide vegetated buffer between the facility and the road.
  - Routing the shared path too close to the fence would create a hazard for bicycle riders and pedestrians. The Tahoe Meadows fence is a metal picket fence so if a rider clips the fence, the handle bars may hang up between the pickets and cause a nasty crash.
  - Riding close to a fence is an uncomfortable riding experience which sends the rider into the center of the shared path. Riding in the center of the path is hazardous to pedestrians and oncoming bicyclists.
  - The proposed minimum profile for Alternative D creates a virtual tunnel with no buffers – an extremely unpleasant condition for both bicyclists and pedestrians.

15-98  
cont.

## TAHOE MEADOWS

### Historic District

- Reducing the separation between the Linear Park shared path and Hwy 50 to substandard widths would adversely affect the safety of the recreational user.
- Reducing the separation between the Linear Park shared path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of the recreational user.
- The combined changes to the intersection of Hwy 50/Lake Road (no left in/left out turns permitted) and the drastically reduced Linear Park profile to accommodate the widening of Hwy 50 would significantly degrade the bicycle/pedestrian facilities creating significant hazards for vehicles, bicyclists and pedestrians at the Hwy 50/Lake Road intersection:
  - By drastically reducing the width of the Linear Park at Hwy 50/Lake Road, trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter. Many will extend into Hwy 50. This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.
  - By drastically reducing the width of the Linear Park at the intersection of Hwy 50/Lake Road, all vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic. This creates a safety hazard affecting bicyclists and pedestrians.
  - The redesign of the Linear Park at Hwy 50/Lake Road eliminates the space for an entering vehicle to wait between the street and the shared path. This creates a significant safety hazard for pedestrians and bicyclists when vehicles try to get out of fast-moving Hwy 50 traffic with no place to pause before crossing the shared path.
- The EIR/EIS/EIS must present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.
- The impact is Significant.

15-98  
cont.

**Letter  
15****Tahoe Meadows Association**  
July 3, 2017

- 
- 15-1 The commenter notes their appreciation for the efforts of TTD staff and consultants to address their concerns about the project, including drawings that illustrate mitigation of their issues with access at the US 50/Lake Road intersection. However, the commenter notes the illustrations were not included in the environmental analysis in the Draft EIR/EIS/EIS; therefore, they are providing comments on the document as published. Exhibits referenced in this comment are included under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS. This commenter does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.
- 15-2 The commenter notes their general support for the redesign of US 50 to alleviate traffic congestion and create a local road through the tourist core. The commenter asserts the Draft EIR/EIS/EIS does not consider the safety of Tahoe Meadows residents, guests, and Linear Park pedestrians and bicyclists and emergency vehicle access at the US 50/Lake Road intersection. The commenter provides background information about Tahoe Meadows and their participation in the planning process for the project. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-3 The commenter states that vehicles entering and exiting Tahoe Meadows at the US 50/Lake Road intersection make heavy use of the left-in/left-out center turn lane, with an estimated 36,000 vehicle entries and exits during the summer months at this access point. The commenter states that Tahoe Meadows gate entry information was submitted to TTD, pointing out the need to address the left-in/left-out access issue. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-4 The commenter expresses concern that the Draft EIR/EIS/EIS analysis does not address safety hazards and impacts on roadway operations related to changes in access to Tahoe Meadows that remove the center left-in/left-out turn lane. The commenter suggests that these changes may require vehicles to make a U-turn at the US 50/Pioneer Trail intersection or make mid-block left turns resulting in back-up in the travel lanes while vehicles wait for the cars ahead of them to get through the keypad access at the Tahoe Meadows gate. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-5 The commenter asserts that the project’s proposal to narrow the Linear Park would create a safety hazard for vehicles, bicyclists, and pedestrians and would cause additional vehicle back-up on US 50. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-6 The commenter asserts that the Draft EIR/EIS/EIS needs to analyze and mitigate the effects on neighborhoods and traffic and transportation from changes to the intersection of US 50/Lake Road. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-7 The commenter asserts that redesign of the Linear Park to reduce the park width at the US 50/Lake Road intersection creates a safety hazard for vehicles, bicyclists, and pedestrians because this change to the path reduces the area that allows for vehicles to wait at the entrance keypad potentially resulting in more vehicles queueing on US 50 and

- resultant conflicts between vehicles and recreation users, pedestrians, and bicyclists. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-8 The comment states that emergency vehicle access at the intersection of US 50 and Lodge Road must be continuously maintained throughout construction of any improvements (including construction staging), at opening in 2020, throughout construction of relocation housing near this location, and in 2040. The comment notes that Exhibits 2-2, 2-3, 2-4, and 2-11 in the Draft EIR/EIS/EIS show a constructing staging area directly in front of the emergency vehicle access at US 50 and Lodge Road and, for Alternative D, access is only provided to the Holiday Inn Express. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-9 The commenter asserts that the “Neighborhood Traffic Operations” needs on page S-5 of the Draft EIR/EIS/EIS do not describe the need to maintain safe access to the Tahoe Meadows neighborhood at US 50 and Lake Road. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-10 The commenter asserts that the project’s changes at the Tahoe Meadows access point and to the Linear Park would increase congestion. The commenter questions whether or not U-turns would be allowed at the new US 50/Pioneer Trail intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-11 The commenter asserts that the first project objective on page S-5 of the Draft EIR/EIS/EIS needs to include safe access to Tahoe Meadows at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.” The commenter is referring to the project objective that states the project would be intended to, “reduce overall vehicle delays through improved motor vehicle mobility on the state highway system, including for commercial access and a better resident and visitor experience.” This project objective is broad enough to encompass the intent of the revisions the commenter is seeking and, as demonstrated in Master Response 2, safe access to Tahoe Meadows at the US 50/Lake Road intersection would be maintained with all realignment alternatives. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 15-12 The commenter asserts that the project’s changes at the Tahoe Meadows access point would increase congestion on US 50 and at the US 50/Pioneer Trail and US 50/Wildwood Avenue intersections. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-13 The commenter asserts that the degraded access to the Tahoe Meadows neighborhood should be identified as a community impact on page S-10 of the Draft EIR/EIS/EIS. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District,” which addresses the commenter’s concern related to degraded access.
- 15-14 The commenter asserts that changes to the intersection at US 50/Lake Road would impact the broader community and create hazardous conditions on US 50 and for bicyclists and pedestrians using the Linear Park. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-15 The commenter asserts that reducing the width of the Linear Park would degrade the recreation user experience of the Linear Park and bicyclists would be uncomfortable having to ride closer to the fence. The commenter asserts that the EIR/EIS/EIS must analyze and present design solutions for the intersection of US 50 and Lake Road to minimize the

- interaction of vehicles and users of the Linear Park. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-16 The commenter asserts that the redesign of the Linear Park as shown in Appendix N of the Draft EIR/EIS/EIS contradicts the objective on page S-12 about improving connectivity and increased safety for bicyclists and pedestrians. Bicycle and pedestrian improvements associated with the US 50 realignment alternatives that would improve connectivity and safety for bicyclists and pedestrians are described in Section 2.3.3, “Corridor Improvements and Enhanced Bicycle, Transit, and Pedestrian Facilities,” of the Draft EIR/EIS/EIS. Master Response 2, “Effects on Access to Tahoe Meadows Historic District,” describes that the paved path within the Linear Park would continue to meet Caltrans Class I Bike Path standards. The comment is noted for consideration by decision makers.
- 15-17 The commenter disagrees with the conclusion of Impact 3.3-4 in the Draft EIR/EIS/EIS that the recreation user experience for the Linear Park would not be degraded because the changes to the Linear Park from the project would create significant hazards to users of the park. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-18 The commenter asserts that a mitigation measure to minimize the interaction of vehicles and pedestrians/bicyclists on the Linear Park and at the Tahoe Meadows entrance must be provided. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-19 The commenter asserts that the proposed changes to the US 50/Lake Road intersection affects the quality of life of Tahoe Meadows residents, guests, bicyclists, and pedestrians and an impact statement is needed to address this issue. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-20 The commenter notes that the project could result in U-turns at the US 50/Pioneer Trail intersection, an increase in U-turns at the US 50/Wildwood Avenue intersection, and would result in effects on roadway operations and an increase in hazards from vehicles waiting to enter Tahoe Meadows that could also increase hazards to bicyclists and pedestrians using the Linear Park. The commenter asserts that the proposed changes to the US 50/Lake Road intersection would affect the broader community by degrading intersection operations and creating hazardous conditions on US 50 and within the Linear Park. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-21 The commenter refers to Impact 3.6-2 on page S-31 of the Draft EIR/EIS/EIS, and asserts that the analysis must include impacts on LOS associated with hundreds of summer peak Tahoe Meadows vehicle trips resulting in U-turns at the US 50/Pioneer Trail intersection and at the US 50/Wildwood Avenue intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-22 The commenter asserts that changes proposed by the project, including reduction in the width of the Linear Park, would result in traffic queueing on US 50 resulting in a rear-end collision hazard and increasing safety hazards for vehicles, bicyclists, and pedestrians where they interact at the Linear Park and entrance to Tahoe Meadows. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-23 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”



- 15-24 The commenter refers to the “Environmental Consequences (NEPA)/Impact Determinations (CEQA, TRPA) before Mitigation” column of the table on page S-31 of the Draft EIR/EIS/EIS. The commenter asserts that without analysis of the impact of changes at the US 50/Lake Road intersection and the redesign of the Linear Park at that location, the analysis cannot conclude that the design features of Alternatives B, D, and E would avoid or minimize the impacts on intersection operations in 2020. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-25 The commenter refers to the “Avoidance, Minimization, and/or Mitigation Measures” column of the table on page S-31 of the Draft EIR/EIS/EIS. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-26 The commenter refers to Impact 3.6-3 on page S-32 of the Draft EIR/EIS/EIS and expresses concern that the traffic studies and traffic analysis contained therein do not include the proposed changes at the US 50/Lake Road intersection and at the Linear Park at the entrance to Tahoe Meadows, such as potential effects on LOS on US 50 and safety of vehicles, bicyclists, and pedestrians. The commenter also asserts that reducing the width of the Linear Park could intensify rear-end collision hazards. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-27 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-28 The commenter refers to the “Environmental Consequences (NEPA)/Impact Determinations (CEQA, TRPA) before Mitigation” column of the table on page S-32 of the Draft EIR/EIS/EIS. The commenter asserts that without analysis of the impact of changes at the US 50/Lake Road intersection and the redesign of the Linear Park at that location the analysis cannot conclude the project alternatives would avoid or minimize the impacts on roadway segment operations. The commenter asserts the analysis must include the adverse impact on LOS of the US 50 roadway segment and associated hazards. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-29 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-30 The commenter refers to the “Avoidance, Minimization, and/or Mitigation Measures” column of the table on page S-32 of the Draft EIR/EIS/EIS. The commenter asserts the EIR/EIS/EIS must include the adverse impact on roadway segment operations because of queueing on US 50 and the potential for rear-end collisions, which would be exacerbated by reducing the width of the Linear Park. The commenter also asserts that vehicles trying to get out of traffic on US 50 block the Linear Park and create a safety hazard for vehicles, bicycles, and pedestrians. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-31 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

- 15-32 The commenter disagrees with the impact conclusions under the “Environmental Consequences (NEPA)/Impact Determinations (CEQA, TRPA) after Mitigation” column of the table on page S-32 of the Draft EIR/EIS/EIS, because analysis of the intersection changes at the US 50/Lake Road intersection and redesign of the Linear Park at that location have not been analyzed. The commenter asserts the EIR/EIS/EIS must include the adverse impact on roadway segment operations because of queueing on US 50 and the potential for rear-end collisions, which would be exacerbated by reducing the width of the Linear Park. The commenter also asserts that vehicles trying to get out of traffic on US 50 block the Linear Park and create a safety hazard for vehicles, bicycles, and pedestrians. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-33 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-34 The commenter refers to Impact 3.6-4 on page S-33 of the Draft EIR/EIS/EIS. The commenter asserts the impact on VMT of proposed changes to access to Tahoe Meadows is not identified and is potentially significant, including effects on VMT associated with needing to wait at a traffic light to make a U-turn and return past the original access point. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-35 The commenter refers to Impact 3.6-5 on page S-34 of the Draft EIR/EIS/EIS. The commenter disagrees with the conclusion that the alternatives would avoid or minimize the impacts on bicycle and pedestrian facilities in 2020 and asserts that the EIR/EIS/EIS must analyze and present design solutions for the intersection at US 50 and Lake Road to minimize the safety hazards associated with the interaction of vehicles and pedestrians/bicyclists at the Linear Park. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-36 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-37 The commenter refers to Impact 3.6-6 on page S-36 of the Draft EIR/EIS/EIS. The commenter disagrees with the conclusion that the alternatives would enhance existing infrastructure and improve vehicular, bicycle, and pedestrian safety; asserts the proposed changes to the Linear Park at the entrance to Tahoe Meadows creates a safety hazard; and the EIR/EIS/EIS must analyze and present design solutions for the US 50/Lake Road intersection to minimize the interaction of vehicles, bicyclists, and pedestrians. The commenter also asserts that the proposed changes to the Linear Park would degrade the facility to below Class I bicycle facility minimums. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-38 The commenter asserts that mitigation measures should be included to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared-use path at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

- 15-39 The commenter refers to Impact 3.6-9 on page S-37 of the Draft EIR/EIS/EIS. The commenter expresses concern that the EIR/EIS/EIS does not recognize the need for continuous emergency vehicle access at the US 50/Lodge Road intersection, including during construction activities. The commenter notes that a construction staging area is shown as located in front of the emergency vehicle access at the US 50/Lodge Road intersection in Exhibits 2-2, 2-3, 2-4, and 2-11 and impairment of emergency vehicle access and neighborhood evacuation would be a significant impact on the safety of the Tahoe Meadows neighborhood. The commenter asserts that the EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and emergency responder access. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-40 The commenter refers to Impact 3.6-12 on page S-40 of the Draft EIR/EIS/EIS. The commenter asserts the analysis cannot conclude that intersections would operate at LOS in 2040 with the proposed transportation improvements and mixed-use development because the traffic studies and traffic analysis do not assess the proposed changes in access to Tahoe Meadows or changes to the Linear Park that would result in queueing on US 50 and would result in safety hazards for vehicles, bicyclists, and pedestrians. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-41 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-42 The commenter disagrees with the conclusion that in 2040 the alternatives would avoid or minimize the effects on intersection operations in 2040 because analysis of intersection changes at the US 50/Lake Road intersection are not included or mitigated. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-43 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-44 The commenter refers to Impact 3.6-13 on page S-41 of the Draft EIR/EIS/EIS. The commenter disagrees with the conclusion that in 2040 the alternatives would avoid or minimize the effects on roadway segment operations in 2040 because analysis of intersection changes at the US 50/Lake Road intersection are not included or mitigated and impacts on operations would result from queueing on US 50 and increased hazards to vehicles, bicyclists, and pedestrians. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-45 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-46 The commenter disagrees with the conclusion that in 2040 the alternatives would avoid or minimize the effects on roadway segment operations in 2040 because analysis of intersection changes at the US 50/Lake Road intersection are not included or mitigated and impacts on operations would result from queueing on US 50 and increased hazards to vehicles, bicyclists, and pedestrians. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

- 15-47 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-48 The commenter asserts the EIR/EIS/EIS analysis must include the adverse impact on roadway segment LOS resulting from the changes at the entrance to Tahoe Meadows and the increase in vehicles queueing in US 50 that also blocks the Linear Park, which would create vehicle, bicycle, and pedestrian hazards. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-49 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-50 The commenter asserts that without analysis of the impact of changes at the US 50/Lake Road intersection and the Linear Park that the conclusions related to the alternatives’ impacts on roadway segment operations in 2040 could not be made. The commenter notes that the increase in vehicles queueing on US 50 that also blocks the Linear Park would create vehicle, bicycle, and pedestrian hazards. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-51 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-52 The commenter refers to Impact 3.6-14 on page S-41 of the Draft EIR/EIS/EIS. The commenter asserts the impact on VMT in 2040 from proposed changes to access to Tahoe Meadows is not identified and is potentially significant, including effects on VMT associated with needing to wait at a traffic light to make a U-turn and return past the original access point. The comment asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-53 The commenter refers to Impact 3.6-6 on page S-36 of the Draft EIR/EIS/EIS. The commenter disagrees with the conclusion that the alternatives would enhance bicycle and pedestrian infrastructure in 2040; asserts the proposed changes to the Linear Park at the entrance to Tahoe Meadows create a safety hazard; and the EIR/EIS/EIS must analyze and present design solutions for the US 50/Lake Road intersection to minimize the interaction of vehicles, bicyclists, and pedestrians. The commenter also asserts that the proposed changes to the Linear Park would degrade the facility to below Class I bicycle facility minimums. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-54 The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-55 The commenter refers to Impact 3.6-18 on page S-44 of the Draft EIR/EIS/EIS. The commenter disagrees with the conclusion that the alternatives would enhance bicycle and pedestrian infrastructure and improve vehicular, bicycle, and pedestrian safety in 2040; asserts the proposed changes to the Linear Park at the entrance to Tahoe Meadows create a

- safety hazard; and the EIR/EIS/EIS must include mitigation measures to minimize the interaction of vehicles, bicyclists, and pedestrians. The commenter also asserts that the proposed changes to the Linear Park would degrade the facility to below Class I bicycle facility minimums. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-56 The commenter asserts that a mitigation measure should be included that reduces the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-57 The commenter refers to Impact 3.6-19 on page S-44 of the Draft EIR/EIS/ES. The commenter expresses concern that the EIR/EIS/EIS does not recognize the need for continuous emergency vehicle access at the US 50/Lodge Road intersection through 2040, including during construction activities. The commenter notes that a construction staging area is shown as located in front of the emergency vehicle access at the US 50/Lodge Road intersection in Exhibits 2-2, 2-3, 2-4, and 2-11 of the Draft EIR/EIS/EIS and impairment of emergency vehicle access and neighborhood evacuation would be a significant impact on the safety of the Tahoe Meadows neighborhood. The commenter asserts that the EIR/EIS/EIS must include mitigation measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and emergency responder access. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-58 The commenter asserts that the need associated with Neighborhood Traffic Operations on page 1-8 of the Draft EIR/EIS/EIS does not describe the need to maintain safe access to Tahoe Meadows at the US 50/Lake Road intersection for residents and renters of the 96 homes in the neighborhood. The commenter notes that the changes to the entrance to Tahoe Meadows would increase congestion at the US 50/Pioneer Trail, and US 50/Wildwood Avenue intersections, it is unclear if U-turns would be allowed at the US 50/Pioneer Trail intersection, and safety hazards would be generated associated with queueing on US 50. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-59 The commenter asserts the project objectives on page 1-9 of the Draft EIR/EIS/EIS needs to include safe access to Tahoe Meadows at the US 50/Lake Road intersection. The commenter notes that the changes to the entrance to Tahoe Meadows would increase congestion at the US 50/Pioneer Trail, and US 50/Wildwood Avenue intersections, it is unclear if U-turns would be allowed at the US 50/Pioneer Trail intersection, and safety hazards would be generated associated with queueing on US 50. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District,” and Response to Comment 15-11.
- 15-60 The commenter expresses concern about how the changes to the Linear Park shown on exhibits in Appendix N of the Draft EIR/EIS/EIS are described in the project description on page 2-19. The commenter asserts that changes in the profile of the Linear Park would degrade bicycle/pedestrian facilities and create hazards to Linear Park users and vehicles extending onto US 50. The commenter asserts that reducing the separation between the Linear Park shared-use path and the Tahoe Meadows fence to substandard widths would adversely affect the safety of recreational users. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-61 The commenter notes that descriptions of road network changes and intersection improvements for Alternatives B, C, and D on pages 2-22–2-23, 2-30, and 2-32 of the Draft EIR/EIS/EIS do not identify changes to the intersection of US 50 and Lake Road. The commenter reiterates earlier comments regarding use of the left-in/left-out turn into Tahoe Meadows, the need for U-turns at the US 50/Pioneer Trail intersection and US 50/Wildwood

Avenue intersection, degradation of road segment and intersection LOS, and safety hazards for vehicles, bicyclists, and pedestrians. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

15-62 The commenter refers to construction activities for the project described on pages 2-14 through 2-42 of the Draft EIR/EIS/EIS. The commenter reiterates earlier comments related to concerns about a proposed construction staging area blocking the US 50/Lodge Road emergency vehicle access point, maintaining emergency vehicle access to Tahoe Meadows at the US 50/Lodge Road intersection, and the emergency gate at the US 50/Lodge Road intersection must remain accessible at all times. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

15-63 The commenter describes Tahoe Meadows homeowners input at public comment opportunities since 2011. The commenter is concerned that Tahoe Meadows input was not included in the designs of alternatives and that the homeowners were not informed about proposed changes to the left-in/left-out access at the main entrance to Tahoe Meadows. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

15-64 The commenter notes that the Tahoe Meadows Historic District is within the study area and should be included in the “Existing Land Uses within the Study Area” discussion in Section 3.2.2, “Affected Environment,” of the Draft EIR/EIS/EIS. The commenter also notes that the US 50/Lake Road intersection is within the project site. The comment is correct and the environmental setting in Section 3.2, “Land Use,” has been revised in this final environmental document. This change is presented in Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures.” The correction does not alter the conclusions with respect to the significance of any environmental impact.

To clarify that a small portion of the Tahoe Meadows Historic District is within the study area, the following sentence has been added after the fifth paragraph under the header, “Existing Land Uses within the Study Area,” on page 3.2-8 of the Draft EIR/EIS/EIS:

The area west of US 50 bound by Lodge Road to the south, Pine Boulevard to the west, and Stateline Avenue to the north, contains a number of tourist lodging facilities, commercial uses, and dining establishments.

The Tahoe Meadows Historic District, a private residential community, is located within the study area southwest of the intersection of Pioneer Trail and US 50. Although a small portion of the District is shown within the project site boundary on Exhibits 3.2-1, 3.2-2, and 3.2-3, the project improvements would not make changes to the fence around the District or on any land that falls within the fence.

In Nevada, the four major resort-casinos, Harrah’s, Harvey’s, Hard Rock, and Montbleu, are located along US 50 between Stateline Avenue and Lake Parkway.

Additionally, the second sentence of the first paragraph under “Surrounding Land Uses,” on page 3.2-8 has been revised to read as follows:

Land uses surrounding the project site are generally similar in nature to the visitor-centered development within the project site. The approximately 100 homes within the Tahoe Meadows Historic District, a private community, is located southwest of the intersection of Pioneer Trail and US 50 are located outside of the project site. Properties to the west of the project site north of Lodge Road consist of a number of



tourist lodging facilities with the shore of Lake Tahoe and Lakeside Marina just beyond.

- 15-65 The commenter asserts the description of changes to the Linear Park resulting from the project included under Impact 3.3-1 on page 3.3-12 of the Draft EIR/EIS/EIS belongs in Impact 3.3-4. The description of the changes that would occur to the Linear Park demonstrates the physical extent of where construction activities, which support these features, would occur and potentially disrupt use of the Linear Park. Impact 3.3-4 includes descriptions of the project's potential to adversely affect recreation users of the Linear Park on pages 3.3-28 through 3.3-31 of the Draft EIR/EIS/EIS. The commenter does not offer any specific information or evidence that the analysis in the environmental document is inadequate; therefore, no further response can be provided.
- 15-66 The commenter disagrees with the less-than-significant impact conclusion for Impact 3.3-4 of the Draft EIR/EIS/EIS. The commenter asserts that the changes to the Linear Park at the US 50/Lake Road intersection would result in significant impacts on recreation user experience because vehicles entering Tahoe Meadows would block flow of Linear Park users, bicycles and pedestrians would have to dodge fast-moving traffic entering Tahoe Meadows from US 50, bicyclists and pedestrians would have an increased potential for accidents resulting from the path being located closer to the Tahoe Meadows fence, and bicyclists and pedestrians would be exposed to an increased hazard associated with reduced separation between the path and US 50. The commenter also asserts that a mitigation measure should be included that reduces the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 15-67 The commenter expresses concern that Section 3.4, "Community Impacts," of the Draft EIR/EIS/EIS does not include analysis of the degraded quality of life for the Tahoe Meadows neighborhood resulting from the proposed changes at the US 50/Lake Road intersection, redesign of the Linear Park, and related traffic effects. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District," and Response to Comment 15-3.
- 15-68 The commenter asserts that Section 3.4, "Community Impacts," of the Draft EIR/EIS/EIS should clarify whether or not land in Tahoe Meadows would be acquired by the project. The commenter also notes that they object to any land acquisition of Association or privately-owned land within the Tahoe Meadows subdivision. The commenter is correct and the text in the "Methods and Assumptions" discussion under Section 3.4.2, "Real Property Acquisitions, Dislocations, and Relocations," has been revised in this final environmental document. This change is presented in Chapter 3, "Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures." The correction does not alter the conclusions with respect to the significance of any environmental impact.

The second paragraph on page 3.4-41 of the Draft EIR/EIS/EIS is revised to read as follows:

The list of parcels identified for acquisition is preliminary but represents the maximum number of acquisitions required for implementation of the build alternatives. The complete list of parcels proposed for acquisition for each alternative is included in Appendix B, "Maps Showing Parcel Acquisition Needs and Geometric Approval Drawings for Alternatives B, C, and D," and represents the maximum number and extent of acquisitions that would occur. Refinements to the final project design could result in a smaller project footprint, which could result in fewer partial and/or full acquisitions. As indicated in Appendix B, no property within Tahoe Meadows, including that which contains the Tahoe Meadows fence, would be acquired by the project. The number of parcels and type of units that would be

acquired for the realigned US 50 ROW for each alternative are summarized in Tables 2-1 and 2-2. The number of parcels and type of units that would be acquired for the mixed-use development are summarized in Table 2-3 and Table 2-4.

15-69 The commenter notes that the document recognizes that several City of South Lake Tahoe parcels are listed for acquisition as part of the project. The commenter expresses their expectation that the acquiring agency would assume the obligation to maintain the fence in its current location and condition as well as the obligation to maintain landscaping as agreed by the City in the original acquisition process. Changes to the Linear Park as a result of the project are described on page 2-19 in Chapter 2, "Proposed Project and Project Alternatives," of the Draft EIR/EIS/EIS. See also Master Response 2, "Effects on Access to Tahoe Meadows Historic District." The City would continue to maintain the Linear Park and any appurtenant features after the project improvements are completed.

15-70 The commenter disagrees with the characterization of the fence around Tahoe Meadows on page 3.4-19 of the Draft EIR/EIS/EIS that it provides physical and visual separation between Tahoe Meadows and mixed-use development at Site 1.

The existing wrought iron fence around the Tahoe Meadows Historic District is a physical barrier between the neighborhood and the Linear Park. The fence, along with the landscaping, provides a filtered view of the Linear Park, US 50, and surrounding commercial and motel/hotel development. This physical barrier would not be changed by the project; however, the commenter is correct and clarification that the Tahoe Meadows fence would not provide a clear visual separation between Tahoe Meadows and mixed-use development at Site 1 has been revised in this final environmental document. This change is presented in Chapter 3, "Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures." The correction does not alter the conclusions with respect to the significance of any environmental impact.

The fourth paragraph on page 3.4-19 is revised to read as follows:

The mixed-use development, including replacement housing, associated with Alternative B would introduce several buildings up to three stories tall in locations that are surrounded by commercial and residential uses. At Site 1, the mixed-use development would replace several older commercial buildings and would maintain and extend the Linear Park along the western edge of the site. The mixed-use development at Site 1 would be physically ~~and visually~~ separated from the Tahoe Meadows Historic District by the Linear Park and existing wrought iron fence; it would replace older commercial development with newer buildings that are consistent in character with other surrounding uses, such as the Holiday Inn Express. At Site 2, the mixed-use development would replace older hotels and apartment buildings along Pioneer Trail with buildings up to three stories tall that are similar in character to other surrounding uses, such as the Heavenly Village Center. Development of Site 2 would introduce buildings that are slightly taller than the existing two-story buildings, but would improve the community character of the neighborhood by replacing hotel units with housing units and commercial uses that would contribute to a stronger sense of community. Site 3 would introduce mixed-use development in an area that is primarily surrounded by commercial development and open space. New development at Site 3 would enhance community character in this area by expanding the existing neighborhood into an area that currently contains no residences. Additionally, the mixed-use development could add new amenities, such as a convenience store or restaurant, that could help maintain community character and cohesion in this neighborhood.

- 15-71 The commenter asserts that development at Site 1 should be scaled to be consistent with Tahoe Meadows, reducing the height of the buildings to two stories.
- The site plan and visual rendering that have been prepared for mixed-use development Site 1 are conceptual at this point. They were developed to be consistent with the TCAP and considering maximum potential development of those sites with one development concept. As described in the Draft EIR/EIS/EIS on pages 3-4 and 3-5, development of Site 1 or any other sites would be subject to subsequent environmental review and design-level review and context-sensitive design considerations could be incorporated at that time.
- 15-72 The commenter expresses support for statements on pages 3.4-19 and 3.4-23 of the Draft EIR/EIS/EIS, which clarify that access to Tahoe Meadows via Lodge Road and access to the Holiday Inn Express would be maintained through Site 1. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during project review.
- 15-73 The commenter expresses concern that the traffic studies and traffic analysis in the Draft EIR/EIS/EIS do not assess changes in access to Tahoe Meadows that affect intersection and roadway operations and vehicle, bicycle, and pedestrian safety, which would be potentially significant impacts. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-74 The commenter expresses concern that the traffic studies and traffic analysis in the Draft EIR/EIS/EIS do not assess changes in access to Tahoe Meadows that affect intersection and roadway operations and vehicle, bicycle, and pedestrian safety. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-75 The commenter asserts that the Draft EIR/EIS/EIS must assess changes in access to Tahoe Meadows that affect intersection and roadway operations and vehicle, bicycle, and pedestrian safety. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-76 The commenter expresses concern that the Draft EIR/EIS/EIS does not include analysis of Lake Road as an existing transportation facility. The commenter notes that the US 50/Lake Road intersection is in the project site; Alternatives B, C, and D affect access to Tahoe Meadows by eliminating the left-in/left-out access at Lodge Road; and the main access is estimated to have 18,000 entries during the summer season. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-77 The commenter expresses concern that the Draft EIR/EIS/EIS does not consider traffic volumes at the US 50/Lake Road intersection. The commenter notes that the US 50/Lake Road intersection is in the project site; the main access is estimated to have 18,000 entries during the summer season; and Tahoe Meadows traffic should be included in existing traffic volumes to inform 2020 and 2040 conditions. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

- 15-78 The commenter expresses concern that the Draft EIR/EIS/EIS does not include the US 50/Lake Road intersection. The commenter notes that the US 50/Lake Road intersection is in the project site; the main access is estimated to have 18,000 entries during the summer season; and Tahoe Meadows traffic should be included in existing traffic volumes to inform 2020 and 2040 conditions. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-79 The commenter asserts that the Draft EIR/EIS/EIS does not assess changes in access to Tahoe Meadows that affect intersection and roadway operations and vehicle, bicycle, and pedestrian safety. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-80 The commenter asserts that the Draft EIR/EIS/EIS does not assess changes in access to Tahoe Meadows that affect roadway operations and vehicle, bicycle, and pedestrian safety in 2020. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-81 The commenter asserts that the analysis of VMT for 2020 in the Draft EIR/EIS/EIS does not consider the effects of changes to access to Tahoe Meadows at the US 50/Lake Road intersection. The commenter asserts that the analysis does not include vehicles entering and exiting Tahoe Meadows at Lake Road, that the project’s changes to access would increase VMT for trips to and from the neighborhood, and that the Draft EIR/EIS/EIS must include a mitigation measure that maintain left-in/left-out at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-82 The commenter asserts that the analysis of impacts on bicycle and pedestrian facilities in 2020 does not consider the effects of proposed changes to access at the US 50/Lake Road intersection. The commenter asserts that the proposed changes would affect intersection operations; vehicle, pedestrian, and bicycle safety; and that the Draft EIR/EIS/EIS must include a mitigation measure to minimize the interaction between vehicles and pedestrians/bicyclists using the Linear Park at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-83 The commenter asserts that the analysis of impacts on bicycle and pedestrian safety in 2020 does not consider the effects of proposed changes to access at the US 50/Lake Road intersection. The commenter asserts that the proposed changes would affect intersection operations; vehicle, pedestrian, and bicycle safety; and that the Draft EIR/EIS/EIS must include a mitigation measure to minimize the interaction between vehicles and pedestrians/bicyclists using the Linear Park at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-84 The commenter asserts that Impact 3.6-9 of the Draft EIR/EIS/EIS does not include continued use of Lodge Road for emergency vehicle access in 2020. The commenter expresses concern that Exhibits 2-2, 2-3, and 2-4 show a construction staging area at the US 50/Lodge Road intersection, which could block access for emergency vehicles. The commenter notes that Exhibit 2-11 shows that with implementation of the mixed-use development, access to the Holiday Inn Express is maintained but access to Lodge Road is not maintained. The commenter also notes that constructing a median at the US 50/Lake Road intersection would affect emergency access at the main entrance. The commenter

- asserts that the EIR/EIS/EIS must include mitigation measures to provide for uninterrupted emergency vehicle access for evacuation and emergency responder access. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-85 The commenter asserts that the Draft EIR/EIS/EIS does not assess changes in access to Tahoe Meadows that affect intersection and roadway operations and vehicle, bicycle, and pedestrian safety. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-86 The commenter asserts that the Draft EIR/EIS/EIS does not assess changes in access to Tahoe Meadows that affect roadway operations and vehicle, bicycle, and pedestrian safety in 2040. The commenter asserts that mitigation measures should be included that maintain the left-in/left-out turns at the US 50/Lake Road intersection and reduce the interaction of vehicles and bicyclists/pedestrians where the Linear Park meets the Tahoe Meadows entrance. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-87 The commenter asserts that the analysis of VMT for 2040 in the Draft EIR/EIS/EIS does not consider the effects of changes to access to Tahoe Meadows at the US 50/Lake Road intersection. The commenter asserts that the analysis does not include vehicles entering and exiting Tahoe Meadows at Lake Road, that the project’s changes to access would increase VMT for trips to and from the neighborhood, and that the Draft EIR/EIS/EIS must include a mitigation measure that maintains left-in/left-out at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-88 The commenter asserts that the analysis of impacts on bicycle and pedestrian facilities in 2040 does not consider the effects of proposed changes to access at the US 50/Lake Road intersection. The commenter asserts that the proposed changes would affect intersection operations; vehicle, pedestrian, and bicycle safety; and that the Draft EIR/EIS/EIS must include a mitigation measure to minimize the interaction between vehicles and pedestrians/bicyclists using the Linear Park at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-89 This commenter essentially restates Comment 15-88. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-90 The commenter asserts that Impact 3.6-9 does not include continued use of Lodge Road for emergency vehicle access in 2040. The commenter expresses concern that Exhibits 2-2, 2-3, and 2-4 show a construction staging area at the US 50/Lodge Road intersection, which could block access for emergency vehicles. The commenter notes that Exhibit 2-11 shows that with implementation of the mixed-use development, access to the Holiday Inn Express is maintained but access to Lodge Road is not maintained. The commenter also notes that constructing a median at the US 50/Lake Road intersection would affect emergency access at the main entrance. The commenter asserts that the EIR/EIS/EIS must include mitigation measures to provide for uninterrupted emergency vehicle access for evacuation and emergency responder access. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-91 The commenter expresses concern that the traffic operations analysis update in the Caltrans Project Report (Appendix I of the Draft EIR/EIS/EIS) does not consider traffic generated by the Tahoe Meadows Historic District. The commenter asserts that the changes at the US 50/Lake Road intersection would create safety hazards for vehicles, bicyclists, and

- pedestrians and would affect intersection and road segment LOS. The commenter asserts that maintaining the left-in/left-out on US 50 at the Tahoe Meadows entrance is feasible. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-92 The commenter notes the omission of consideration of Lake Road and the US 50/Lake Road intersection in the Draft EIR/EIS/EIS traffic analysis. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-93 This comment essentially restates Comment 15-91. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-94 This comment essentially restates Comment 15-91. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-95 The commenter asserts that the descriptions of Alternatives B, C, and D in the Caltrans Project Report (Appendix I of the Draft EIR/EIS/EIS) does not include the proposed changes that eliminate the left-in/left-out turn lane at the entrance to Tahoe Meadows. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-96 The commenter expresses concern that forecasts of future year traffic (both 2020 and 2040) for Alternatives B, C and D do not include the impact of geometric changes to the US 50/Lake Road intersection, including reducing the width of Linear Park and eliminating left-in/left-out turns at the intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-97 The commenter expresses concern that forecasts of future year VMT in 2020 and 2040 do not include the proposed changes at the US 50/Lake Road intersection. The commenter asserts that removal of the left-in/left-out lane at the Tahoe Meadows entrance would increase VMT resulting in a potentially significant impact on VMT. The commenter asserts that maintaining the left-in/left-out lane is feasible. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 15-98 The commenter asserts that the proposed changes to the Linear Park shown in Appendix N of the Draft EIR/EIS/EIS are unacceptable because they would create a safety hazard for vehicles, bicyclists, and pedestrians at the US 50/Lake Road intersection. The commenter asserts the EIR/EIS/EIS must present design solutions to minimize the interaction between vehicles and pedestrians/bicyclists using the Linear Park. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”



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**ROLLSTON, HENDERSON, CRABB & JOHNSON, LTD**  
ATTORNEYS

Letter  
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ROBERT M. HENDERSON\*  
J. DENNIS CRABB  
MICHAEL K. JOHNSON\*

<sup>Of Counsel</sup>  
KENNETH C. ROLLSTON (Ret.)  
MICHAEL P. HAMBSCH\*

\* Also Licensed in Nevada

June 7, 2017

**VIA HAND DELIVERY**

Tahoe Transportation District  
Board of Directors  
128 Market Street, Suite 3F  
Stateline, NV 89449

Re: Tahoe Meadows Homeowners Association/US 50 South Shore Community  
Revitalization Project (Project)

Dear Tahoe Transportation District:

Please be advised the undersigned represents Tahoe Meadows Homeowners Association (Tahoe Meadows) with regard to the above-described matter. Tahoe Meadows and its 98 members own property near and/or adjacent to what I understand to be on or near the proposed westerly terminus of the Project. This letter, and attachment hereto, constitute Tahoe Meadows' initial comments and objections to the US 50 South Shore Community Revitalization Project (Project) Public Draft California Environmental Quality Act (CEQA) Environmental Impact Report (EIR), Tahoe Regional Planning Agency (TRPA) Environmental Impact Statement (EIS), and National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS).

As you will note from the attached "TAHOE MEADOWS GENERAL COMMENTS". Tahoe Meadows has several concerns about Alternatives B, C and D inasmuch as all such alternatives present significant environmental, health & safety, traffic and related issues. As you will see from the attached, approximately 36,000 vehicles pass through the intersection of Highway 50 and Lake Road (the entrance/exit to Tahoe Meadows' neighborhood) during the three (3) summer months. The failure of the alternatives to address the effect on this traffic and related ingress and egress necessarily renders such an analysis deficient and legally fatally flawed. Despite diligent efforts by Tahoe Meadows over the past several years and assurances from TTD staff that such concerns would be appropriately addressed, Tahoe Meadows remains concerned that its voice has not been appropriately heard and/or addressed. However, Tahoe Meadows remains fully committed to working with TTD and is confident that if such current concerns are properly addressed, Tahoe Meadows will be able to support a revised version of the Project.

16-1

591 Tahoe Keys Boulevard, Suite D8 • South Lake Tahoe, California 96150  
telephone: South Lake Tahoe (530) 544-1785 e-mail: rhrc@rhrc-law.com facsimile: (530) 544-5053

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**ROLLSTON, HENDERSON, CRABB & JOHNSON, LTD.**  
**ATTORNEYS AT LAW**

P. O. Box 4848  
Stateline, NV 89449  
Telephone (775) 588-4212  
Facsimile (775) 588-4213  
e-mail [mike@taholawyer.com](mailto:mike@taholawyer.com)

591 Tahoe Keys Boulevard, Suite D8  
South Lake Tahoe, California 96150  
Telephone 530/544-1785  
Facsimile 530/544-5053  
e-mail [rhrc@rhrc-law.com](mailto:rhrc@rhrc-law.com)

**FACSIMILE COVER PAGE**

**DATE:** June 7, 2017  
**TO:** Tahoe Transportation District  
**VIA FAX:** (775) 588-0917  
**FROM:** Michael K. Johnson, Esquire  
**RE:** Letter dated June 7, 2017

<b>DOCUMENTS</b>	<b>NO. OF PAGES</b> (Not Including this Cover Page)
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**COMMENT:**

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Tahoe Transportation District  
Board of Directors  
June 7, 2017  
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Tahoe Meadows and I remain open to any and all communications with TTD board members and staff at any time and further look forward to TTD's written responses to its comments<sup>1</sup>.

We look forward to meeting with staff, working with you, and receiving an appropriate written response. Please do not hesitate to contact us at any time.

Sincerely,



Michael K. Johnson

MKJ:dh  
Encl.

16-1  
cont.

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<sup>1</sup> *Inter Alia*, Cal. Code Regs., tit. 14, §15088, subds. (a), (b).

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**TAHOE MEADOWS GENERAL COMMENTS**  
**US 50/SOUTH SHORE COMMUNITY REVITALIZATION PROJECT**  
**EIR/EIS/EIS**

Tahoe Meadows generally supports the redesign of Hwy 50 to alleviate traffic congestion and create a local road through the casino core. Tahoe Meadows residents and their guests experience first-hand summer back-up conditions right outside the only neighborhood entry point at Hwy 50/Lake Road.

16-2

However, this EIR/EIS/EIS fails to consider the safety of Tahoe Meadows residents and guests, Linear Park bicyclists and pedestrians, and the public at large by failing to identify, analyze and design solutions to the newly created hazards at the intersection of Hwy 50/Lake Road. In addition, uninterrupted Emergency Vehicle Access at Hwy 50/Lodge Road is not preserved.

**Background**

Access to Tahoe Meadows was not identified as a potential impact during the initial scoping period (2011) because the Notice of Preparation/Notice of Intent did not provide sufficient details for Tahoe Meadows to imagine that access at the Hwy 50/Lake Road intersection and at the Hwy 50/Lodge Road Emergency Vehicle Access gate might be changed in any way. The Notice of Preparation/Notice of Intent description and illustration were too rudimentary to predict that access to the Tahoe Meadows neighborhood might be an issue. Staff at the public scoping sessions stated that no change to Tahoe Meadows access was anticipated.

As the engineering on the alternatives progressed, beginning in 2012 Tahoe Meadows identified and brought to TTD staff's attention the issues of access at Hwy 50/Lake Road (potential loss of left in/left out turns) and the Hwy 50/Lodge Road Emergency Vehicle Access.

These access issues have been raised by Tahoe Meadows homeowners in emails, public meetings and workshops, and the Citizen's Review Committee meetings – as often as possible since 2012.

16-3

Tahoe Meadows homeowners have been repeatedly assured by project staff (project managers and the TTD general manager) that these access issues are known to them, that the access issue was raised with the appropriate consultants and that the left in/left out turns at Hwy 50/Lake Road would be maintained.

It is clear from review of the EIR/EIS/EIS documents that the access issue information has been completely ignored by project staff and consultants in the preparation of the alternative designs and this EIR/EIS/EIS.

Tahoe Meadows has 96 homes. There are full-time residents, short term rental properties in use throughout the year and a number of seasonally occupied homes. There is only one point of entry to Tahoe Meadows: the gate at Hwy 50/Lake Road.

There are Emergency Vehicle Access gates at Hwy 50/Lodge Road and at Hwy 50/Wildwood Ave. as required by South Lake Tahoe Fire Dept. These are not used for resident vehicle access. There are two additional pedestrian-only gates but neither can accommodate any type of vehicle. Fire evacuation of the 96 homes will require use of all egress points.

16-4

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Vehicles entering and exiting Tahoe Meadows at Hwy 50/Lake Road make heavy use of the left in/left out turning pattern permitted by the center left turn lane.

The summer months are the months with the highest number of residents and guests. The Tahoe Meadows gate log shows that the entry gate opened 7,338 times in July 2013, not including the heaviest traffic day - July 4<sup>th</sup> - when the gate was locked open so no entry count was made. *The actual entry vehicle count would be much higher because more than one vehicle often enters on each gate opening cycle during busy periods. And, obviously, the number of vehicle trips is doubled because the counted number is only the entry gate operation; an equal number of vehicles also exit* producing well in excess of 15,000 vehicle trips in July 2013 at this intersection. Since that time, with the increase in Vacation Home Rentals, Tahoe Meadows now has approximately 18,000 entries during the three-month summer season. With the matching exits, the Tahoe Meadows entry at Hwy 50/Lake Road sees about 32,000 total vehicle trips in the peak summer season.

16-5

The July 2013 Tahoe Meadows' Hwy 50/Lake Road gate entry information was submitted in September 2013 as part of a Community Review Committee written comment pointing out the need to actively address the left in/left out access issue.

In a December 12, 2014 email the project manager, Alfred Knotts, said,

**"I wanted to let you know I did follow up with our Design Engineer and he has assured me that we can get a two way left in front of Tahoe Meadows so it will essentially mimic what is occurring today."**

In September 2015, when we learned Mr. Knotts was no longer on the project, we reiterated our concerns to the current project manager, Russell Nygaard.

At the April 27, 2017 open house event, Tahoe Meadows homeowners continued to be told by project staff that left in/left out turns at Hwy 50/Lake Road would be retained. Based on the data, analysis and designs presented in the EIR/EIS/EIS, that statement was completely incorrect.

16-6

Creating traffic back-ups and significant hazards for vehicles, bicyclists and pedestrians at Hwy 50/Lake Road is not acceptable.

Loss of continuous emergency vehicle / evacuation access at Hwy 50/Lake Road is not acceptable.

The EIR/EIS/EIS is inadequate because it fails to analyze, include in project alternative designs, or identify solutions for the following issues:

#### **1. Impacts of Changing Tahoe Meadows Access at Hwy 50/Lake Road**

The neighborhood impact analysis and traffic studies and analysis in this EIR/EIS/EIS are inadequate because they fail to include the proposed change in access to Tahoe Meadows to eliminate left in/left out turns under proposed Alternatives B, C (including EIR/EIS/EIS mitigation measures) and D.

The intersection of Hwy 50/Lake Road (Tahoe Meadows' entry) is in the project site according to Exhibits S-1, 2-1, and 3.6-1.

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There is no analysis of this significant change in neighborhood access. Alternatives B, C (including EIR/EIS/EIS mitigation measures) and D as currently shown in the EIR/EIS/EIS exhibits clearly impact the neighborhood's access at Hwy 50/Lake Road by reconfiguring Hwy 50 to eliminate the left in/left out turning motions for thousands of vehicle trips per year.

With no left turns permitted at Hwy 50/Lake Road, vehicles will be required to make U-turns to continue in the desired direction. Those U-turns could occur at the signals at Hwy 50/Pioneer Trail and Hwy 50/Wildwood Ave. or they could occur mid-block from the center lane between Hwy 50/Lake Road and Hwy 50/Wildwood which is a dangerous situation. Hundreds of additional summer peak average day vehicle trips will have make U- turns. Since U-turns at signaled intersections are slower to complete than simple left turns, the number of cars able to clear the impacted intersections on each left turn arrow will be drastically reduced producing added queuing and delay. This would degrade the Level Of Service at both intersections and increase the Vehicle Miles Traveled (both individually and for the project as a whole) under Alternatives B, C (including EIR/EIS/EIS mitigation measures) and D.

It is unclear from the EIR/EIS/EIS illustrations whether U-turns at Hwy 50/Pioneer Trail will be permitted under Alternatives B, C (including EIR/EIS/EIS mitigation measures) and D. If not, the design of Alternatives B, C (including EIR/EIS/EIS mitigation measures) and D totally fails to accommodate all traffic demand and makes access to Tahoe Meadows from the west virtually impossible.

16-6  
cont.

Removing the left turn queuing area (existing center lane) and requiring all vehicles entering Tahoe Meadows to travel west on Hwy 50 to make a right entry turn will create a back-up in the travel lane while vehicles wait for the cars ahead of them to use the keypad to open the Tahoe Meadows gate. This will adversely impact road segment operations and create a significant safety hazard: higher potential for rear-end collisions due to stopped vehicles in the travel lane.

That situation is further exacerbated by the proposal to narrow the Linear Park at this critical intersection forcing trucks or vehicles with trailers to block the shared bicycle/pedestrian path while using the gate keypad. This creates a safety hazard affecting vehicles, bicyclists and pedestrians.

The significant changes to the intersection of Hwy 50/Lake Road and adverse impacts to study area intersections (including Hwy 50/Lake Road itself) and road segments that result from the changes are not addressed in the analysis of the alternatives' impact on neighborhoods or in the analysis of the alternatives' impact on traffic & transportation.

These impacts need to be analyzed and a solution identified that maintains left in/left out access at Hwy 50/Lake Road.

## **2. Reduction of the Width of the Linear Park at Hwy 50/Lake Road**

The EIR/EIS/EIS is inadequate because it fails to identify, analyze and mitigate the creation of safety hazards for vehicles, bicyclists and pedestrians at the intersection of Hwy 50/Lake Road due to narrowing the Linear Park at this intersection.

The current Linear Park profile allows one entering vehicle using the entry gate keypad and one additional vehicle behind to stop out of the westbound Hwy 50 traffic lane with space between

16-7



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for the full width of the shared path. Exiting vehicles have space to wait for a break in oncoming traffic without blocking the shared path.

Redesign of the Linear Park to drastically reduce the park profile at Hwy 50/Lake Road as shown in Appendix N under proposed Alternatives B, C and D creates significant safety hazards for vehicles, bicyclists and pedestrians.

Vehicles must stop to use the keypad to open the Tahoe Meadows gate. By drastically reducing the width of the Linear Park at Hwy 50/Lake Road (as shown in Appendix N), the following new hazards are created:

- Trucks and vehicles with trailers entering Tahoe Meadows will block the shared bicycle/pedestrian path while using the gate keypad to enter.
- All vehicles exiting Tahoe Meadows will block the Linear Park shared path while waiting for a break in oncoming traffic.
- This creates a safety hazard affecting vehicles, bicyclists and pedestrians by potentially sending bicyclists and pedestrians dangerously close to or into the Hwy 50 westbound travel lane.

16-7  
cont.

When a vehicle is stopped at the keypad, additional traffic entering Tahoe Meadows will have to queue in the westbound travel lane of Hwy 50 to wait for the vehicle ahead to clear the gate. Narrowing the Linear Park at Hwy 50/Lake Road creates a significant traffic safety hazard for rear-end collisions on Hwy 50.

Vehicles trying to quickly get out of the fast-moving Hwy 50 westbound travel lane may choose to block the Linear Park shared path to avoid being rear-ended. This creates the safety hazard of dangerous interactions with pedestrians and bicyclists using the Linear Park shared path. As shown in Appendix N, vehicles entering Tahoe Meadows will have no space between the road and the shared path to pause for path users.

The volume of daily vehicle trips generated by the Tahoe Meadows neighborhood makes the creation of new traffic hazards for pedestrians, bicyclists and vehicles at Hwy 50/Lake Road unacceptable.

The proposed changes to the Linear Park create significant safety issues at Hwy 50/Lake Road. Full analysis of the impacts in the EIR/EIS/EIS and redesign of the proposed Alternatives is necessary.

### **3. Combined Impacts of Changes to the Hwy 50/Lake Road Intersection and Redesign of the Linear Park**

The EIR/EIS/EIS is inadequate because it fails to identify and analyze the compounding of impacts at Hwy 50/Lake Road with the narrowing of the Linear Park at that location.

16-8

The combined adverse impacts to recreational user safety and experience, community quality of life and adjacent road intersection and road segment operations that result from these combined changes are not addressed in the EIR/EIS/EIS analysis of the alternatives' impact on neighborhoods, recreational facilities and traffic & transportation.

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The EIR/EIS/EIS must analyze and present design solutions for the intersection at Hwy 50/Lake Road to minimize the interaction of vehicles and pedestrians/bicyclists using the Linear Park shared path.

16-8  
cont.

#### 4. Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road

The EIR/EIS/EIS is inadequate because it fails to recognize the need for continuous emergency vehicle access at Hwy 50/Lodge Road including during construction activities under proposed alternatives B, C (including EIR/EIS/EIS mitigation measures) and D.

Exhibit 2.2 (Alternative B) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.

Exhibit 2.3 (Alternative C) shows a large construction staging area directly in front of the Emergency Vehicle Access at Hwy 50/Lodge Road indicating that the access would be blocked perhaps for weeks or months at a time.

Exhibits 2-4 and 2-11 (Alternative D) show access provided to the Holiday Inn Express, but no Emergency Vehicle Access at Hwy 50/Lodge Road.

The Hwy 50/Lodge Road Emergency Vehicle Access is an essential part of the Tahoe Meadows Fire Evacuation Plan and is required by the South Lake Tahoe Fire Dept.

16-9

Tahoe Meadows has extremely limited access for emergency vehicles: one vehicle entry point at Hwy 50/Lake Road and two Emergency Vehicle Access points at Hwy 50/Wildwood Ave. and Hwy 50/Lodge Road. There are two additional pedestrian-only access gates but neither can accommodate any type of vehicle.

Fire evacuation of the 96 homes will require use of all egress routes.

Emergency Vehicle Access and neighborhood evacuation would be impaired by construction of a median of any height as part of the transportation improvements at the Hwy 50/Lake Road intersection.

The EIR/EIS/EIS must include measures to assure uninterrupted emergency vehicle access for neighborhood evacuation and for emergency responder access.

Emergency Vehicle Access at Hwy 50/Lodge Road must be continuously maintained without interruption throughout construction of any improvements (including construction staging activities), at opening in 2020, throughout construction of relocation housing near this location, and in the Horizon Year 2040.

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Tahoe Meadows General Comments – Hwy 50 Redesign EIR/EIS/EIS

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**Letter  
16**

**Michael Johnson**  
June 7, 2017

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- 16-1 The commenter provides introductory text describing that the letter and attachment represents Tahoe Meadows Homeowners Association (Tahoe Meadows) comments and objections to the Draft EIR/EIS/EIS. The commenter also expresses concerns regarding Alternatives B, C, and D and asserts that the Draft EIR/EIS/EIS does not address the effect on Tahoe Meadows traffic and related ingress and egress from Lake Road onto US 50. TTD met with representatives of Tahoe Meadows on June 12, 2017, June 13, 2017, and June 23, 2017 to discuss their concerns. TTD and its project design engineers have made project refinements that minimize impacts on the Tahoe Meadows entrance, retain the left-in/left-out turn option for Lake Road, and minimize impacts on the Linear Park. The TTD Board authorized execution of an agreement between TTD and Tahoe Meadows to revise the US 50 design to address their concerns (TTD 2017). Please see Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 16-2 The commenter states that Tahoe Meadows generally supports the project. However, the commenter also asserts that the Draft EIR/EIS/EIS does not consider the safety of Tahoe Meadows residents and others by not analyzing hazards created at the US 50/Lake Road intersection and does not maintain uninterrupted emergency access to Lodge Road. Please see Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 16-3 The commenter provides a brief history of interactions between representatives of Tahoe Meadows and TTD related to access concerns, the ability to retain the left-in/left-out turns to and from Lake Road onto US 50, and emergency access to Lodge Road. The commenter further asserts that the Draft EIR/EIS/EIS does not discuss these issues in the development of alternatives. Please see Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 16-4 The commenter describes that there are emergency access gates at US 50/Lodge Road and at US 50/Wildwood Avenue, and two additional pedestrian-only gates that cannot accommodate vehicles. Please see Master Response 2, “Effects on Access to Tahoe Meadows Historic District,” regarding maintaining emergency access to Lodge Road.
- 16-5 The commenter states that vehicles entering and exiting Tahoe Meadows at US 50/Lake Road make heavy use of the left-in/left-out turning pattern permitted by the center left turn lane. The commenter also provides information on the number of vehicles entering and exiting Tahoe Meadows during peak periods. This comment by itself does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 16-5 The commenter expresses concern that the Draft EIR/EIS/EIS does not consider traffic volumes at the US 50/Lake Road intersection. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 16-6 The commenter summarizes information about vehicle entry to Tahoe Meadows and use of the left-in/left-out turn lane. The commenter expresses concern that the EIR/EIS/EIS does not analyze the change in neighborhood access that could degrade LOS at intersections and roadway segments and increase VMT. The commenter also asserts that the changes to access could result in safety hazards for vehicles, bicyclists, and pedestrians. The commenter asserts the EIR/EIS/EIS needs to identify a solution that maintains the left-in/left-out access. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

- 16-7 The commenter expresses concern that the EIR/EIS/EIS does not identify and mitigate safety hazards for vehicles, bicyclists, and pedestrians at the US 50/Linear Park intersection due to narrowing the Linear Park at that location. The commenter describes typical operations at the keypad entrance to Tahoe Meadows that create dangerous interactions between vehicles and pedestrians/bicyclists. The commenter asserts that redesign of the alternatives is necessary. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 16-8 The commenter asserts the EIR/EIS/EIS does not address the combined adverse effects on recreational user safety and experience, community quality of life, and adjacent road intersection and road segment operations that result from the changes to the US 50/Lake Road intersection and redesign of the Linear Park. The commenter states that the EIR/EIS/EIS must analyze and present design solutions for the US 50/Lake Road intersection to minimize the interaction between vehicles and pedestrians/bicyclists using the Linear Park. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 16-9 The commenter expresses concern that the EIR/EIS/EIS does not recognize the need for emergency access at the US 50/Lodge Road intersection during construction activities. The commenter also notes that emergency vehicle access and neighborhood evacuation would be impaired by construction of a median on US 50 at the US 50/Lake Road intersection. The commenter asserts that the EIR/EIS/EIS must include measures that provide for continuous emergency vehicle access and neighborhood evacuation. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

## Individuals

**Jessica Mitchell**

Letter  
17

**From:** roger adams <adams.roj@gmail.com>  
**Sent:** Thursday, June 15, 2017 6:22 PM  
**To:** info@tahoetransportation.org  
**Subject:** Roger Adams- Loop Road Proposals and Tahoe Meadows Access

Dear Transportation Dept.

I am a resident of Tahoe Meadows. I applaud your efforts to do something about the traffic jam at this end of town. I think a bypass around the casinos will be very beneficial to all of us. However, I have two very serious concerns with options B, C, and D. Tahoe meadows residents must have the ability to enter and exit our gate by turning left as is currently available. Do you really expect emergency vehicles to continue to Pioneer trail and then U turn back to our gate? Also widening Hwy 50 to six lanes would cause very serious safety issues at our gate. Cars with trailers would be blocking Hwy 50 while waiting for the gate to open.

There are many times when the gate is balky or the people trying to enter have trouble with the gate codes etc. I dont see the need for six lanes for this short section of road and I think the disadvantages would far outweigh any advantages. Thank you for your consideration.

Roger Adam  
 3780 Meadow Rd  
 Tahoe Meadows  
 South Lake Tahoe

17-1

**Letter  
17**

**Roger Adams**  
June 15, 2017

- 17-1 The commenter expresses support for the intent of the project to address traffic near the resort-casinos, but is concerned with reconfiguring US 50 in front of the entrance to Tahoe Meadows. The commenter asserts that Tahoe Meadows residents must have the ability to enter and exit the gate using the existing left-turn lane. The commenter is also concerned with safety issues related to queueing at the entrance and access for emergency vehicles. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell**

**Letter  
18**

**From:** salbrink@juno.com  
**Sent:** Wednesday, June 14, 2017 3:41 AM  
**To:** info@tahoetransportation.org  
**Cc:** natalbrink@gmail.com  
**Subject:** S. Albrink - Hwy 50 changes

To Whom it May Concern:

Did you grow up on historical fiction--reading or watching "Little House on the Prairie" or "Little House in the Big Woods"? Did you know we have the real deal, right here in Tahoe?

Our family has a historic log cabin in Tahoe Meadows, which is on a National Registry of Historic Places. This little piece of history is special, but it is also vulnerable, as it is made of wood and surrounded by pine trees.

The proposed changes to Loop Road would affect emergency vehicle access to this area, and also make it more difficult and dangerous to enter and leave Tahoe Meadows since the proposal would narrow the Linear Park Lawn causing cars to block the bike and pedestrian trail as they stop at the gate. As I understand it, about 18,000 cars enter and leave thru the main gate every summer.

The proposal also alters traffic flow such that cars headed north on Hwy 50 would have to make a U turn after exiting the gate. This seems like a recipe for accidents. I'm certain the Fire Dept and Police Dept have better things to do besides respond to the problems that such a change would create.

Please take the time to revisit the proposed changes to the Loop Road/Hwy 50/Pioneer Trail Intersection. A safe environment is in the best interest of everyone at Tahoe, those in small developments and the big economic interests at Stateline, as well.

Sincerely,  
Sherry Albrink

How To Remove Eye Bags & Lip Lines Fast (Watch) Fit Mom Daily  
<http://thirdpartyoffers.juno.com/TGL3131/594112d689ddb12d61da6st04duc>

18-1

**Letter  
18**

**Sherry Albrink**  
June 14, 2017

- 18-1 The commenter asserts the project would affect emergency vehicle access to Tahoe Meadows and would make entering and leaving Tahoe Meadows more difficult and dangerous. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell**

**Letter  
19**

**From:** Cody Bass <codybass@me.com>  
**Sent:** Friday, July 07, 2017 2:24 PM  
**To:** suggestions@us50revitalization.org  
**Cc:** asass@cityofsl.us; wdavid@cityofsl.us; tdavis@cityofsl.us  
**Subject:** Cody Bass-Comments on Loop Road

To whom it may concern,

I believe that the current proposals for the loop road project does not benefit the community of South Lake Tahoe and greater Lake Tahoe region in the ways that this amount of resource could provide with more thought from community members.

With the amount of resources proposed we could eliminate the use of dump trucks hauling snow from the middle of highway 50 and even filter all the melt before it goes into the lake. That's the type of a project that would make sense to use a hundred million dollars to revitalize highway 50, and could still accomplish the goals of rerouting the highway. While also majorly reducing the carbon footprint from stopping dump trucks hauling snow all across town. On top of that a serious amount of protection to the road's from not having lines of dump trucks destroying pavement from every storm we have in the winter. A major help to road safety in our town, and better access for our businesses.

I have a vision for this project that is proven to work in city's comparable to our environment. Saving millions of dollars in maintenance and improving the environment and clarity of Lake Tahoe.

I believe we should not build at this time and continue exploring options that will provide benefit to the entire town, not just one district. I would like to get active in the process and know many other people that believe in this vision and would contribute there time.

The amount of resources proposed only benefit a very small portion of our town and Lake Tahoe. Using those resources in a way that benefits the entire town and presents a model for other towns to follow while also improving the clarity of the lake seems much more desirable and something that everyone can get behind. Let's continue working on a better environmental plan for Lake Tahoe accomplishing goals that benefit all!

Sincerely,  
Cody L. Bass  
530-542-0420

Sent from my iPhone

19-1



**Letter  
19****Cody L. Bass**  
July 7, 2017

- 19-1 The commenter expresses opposition to the project and provides alternative suggestions, such as investing in improved snow removal equipment and stormwater filters or continuing to explore other options that would save money and benefit the entire town instead of a small portion. The alternative suggestions do not meet the project's purpose, need, or project objectives. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.

**Jessica Mitchell****Letter  
20**

**From:** mightybasta@aol.com  
**Sent:** Friday, July 07, 2017 1:08 PM  
**To:** info@tahoetransportation.org  
**Subject:** Michele Basta-Loop Road Project

Michele Basta

mightybasta@aol.com

I would like to comment that I live on Moss Road and I would prefer that Plan D was chosen. Many like the Elizabeth Lodge should be torn down. Also, giving incentives to property owners to assist them with fixing and maintaining their properties would be a great idea.

Please go with Plan D!

Thank you!!!!

20-1

**Letter  
20****Michele Basta**  
July 7, 2017

- 20-1 The commenter notes that she lives on Moss Road and that she prefers Alternative D. She also asserts that certain motels should be torn down and incentives should be provided to property owners to fix and maintain their properties. The commenter expresses support for Alternative D; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.

RECEIVED  
JUN 30 2017

6/27/17

Letter  
21

Dear Mr. Russ Nygaard:

We own a home in Tahoe Meadows at 3793 Azure Road. It has recently come to our attention as to what you and the Tahoe Transportation District have planned to change our access to Tahoe Meadows off Highway 50.

First, relative to the elimination of the left hand turn lane. As a 70 year old person, I feel that emergency vehicles need to have access to Tahoe Meadows as quickly as possible. The elimination of the left hand turn lane will greatly delay access to Tahoe Meadows by a significant amount of time.

Secondly and very importantly, the

21-1

Narrowing of the width of the Linear Park creates a tremendous safety issue. I cannot tell you how many times that I've driven down Highway 50 from the Casino area, planning on making a right turn into Tahoe Meadows. That I've thought I was going to be rear ended as I've had to slow down to turn into the Meadows. People accelerate as they leave the slightly uphill stop light at Pioneer Trail intersection and are not fully alert to someone making a right turn into Tahoe Meadows, I believe. Narrowing the Linear Park area to right-turn into, with pedestrians and bicycles to deal with, will make this situation a much worse safety issue.

Mr. Nygaard, thank you for your

21-1  
cont.

attention to these two very serious issues. The safety of all members and guests of Tahoe Meadows is on your shoulders. We trust you will see how important these issues are.

Thank you for your consideration on this matter.

Frank + Gayle Boitano  
18694 Carriage Hill Dr.  
San Jose, Calif. 95120

21-1  
cont.

**Letter  
21**

**Frank and Gayle Boitano**  
June 30, 2017

21-1

The commenter asserts that emergency vehicles need to have access to Tahoe Meadows as quickly as possible and elimination of the left-hand turn lane would delay access. The commenter also notes that narrowing the width of the Linear Park would create a safety issue for vehicles turning right into Tahoe Meadows. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell****Letter  
22**

**From:** C Daum <designscapes@att.net>  
**Sent:** Monday, May 01, 2017 8:19 PM  
**To:** relocation@us50revitalization.org  
**Cc:** info@us50revitalization.org  
**Subject:** Alternative E & eminent domain

Dear Russ,

I wanted to express my concerns for the lack of information on property tax laws regarding eminent domain. I feel if eminent domain is part of some of your alternatives you are proposing that citizens of California should be informed that the property tax for a "comparable replacement property" may go up if it is not considered comparable, (or) if the full cash value received for the eminent domain is more than 120% of the purchase price or award. Citizens should be made aware of this for negotiating. The rule is a law controlled by the State Board of Equalization 462.500.

22-1

Due to this lack of information given out to the community, my vote is for the Skywalk alternative E or no change at all.

Best Regards,

*Carol Daum  
 P.O. box 550160  
 South Lake Tahoe, CA 96155*

**Letter  
22**

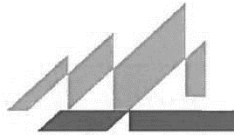
**Carol Daum**  
 May 1, 2017

22-1

The commenter expresses concern for lack of information on property tax laws regarding eminent domain and that the public should be informed of property tax implications. As noted on page 2-5 in Section 2.3.1, "Replacement Housing," of the Draft EIR/EIS/EIS, TTD has approved a set of guiding principles for the development and implementation of the proposed project, which includes the following commitments regarding right-of-way acquisition (TTD 2016):

- ▲ Necessary right-of-way will be acquired prior to the start of road construction.
- ▲ Existing developed and occupied real estate will not be removed until project construction is funded and residential and business relocation is completed.
- ▲ Acquisition process will follow the Federal "Uniform Act" based [on a] willing seller basis.
- ▲ Any possible use of eminent domain by the District would only be necessary to complete the needed right of way and would follow exact provisions of the Uniform Act.

The project will seek to acquire property on a willing seller basis before potentially utilizing eminent domain. The commenter states support for Alternative E or no project at all; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.

Letter  
23Tahoe Transportation  
DISTRICTUS50/South Shore  
Community Revitalization ProjectCOMMENTS  
Regarding the  
Public Draft EIR/EIS/EIS

Please hand in comments during the meeting, mail them (address on back), fax them to 775-588-0917, or send an email. Those submitting comments electronically should provide them by email in either Microsoft Word format or as a Portable Document Format (PDF) to [info@tahoetransportation.org](mailto:info@tahoetransportation.org). Please include "US50/South Shore Community Revitalization Project Comment" in the email subject line.

Name: FRITZ ERIKSEN

Organization (if any): \_\_\_\_\_

Address (optional): \_\_\_\_\_

City, State, Zip: Z.C. NV 89448E-mail: fritz.eriksen@yahoo.com

The Tahoe Transportation District (TTD) and Tahoe Regional Planning Agency (TRPA) invite you to provide comments you have on the US50/South Shore Community Revitalization Project. To submit comments, please fold this page in half, tape closed, affix postage and place in the mail to Russ Nygaard at the address on the reverse. Written comments should be sent at the earliest possible date, but no later than 5:00 p.m. on July 7, 2017. Thank you for your comments

## Comments:

Economic Study: Not nearly enough information to justify a \$16-25M increase in economic activity in the Cal. corridor. No new parking cannot lead to an increase in customers. How could they spend 20% more @ Ruby's just because of a Bypass? Commercial space is already maximized in the area so where does the increased revenue come from? Very subjective speculation

23-1

Traffic Study: Volumes have actually decreased since 2003! Potential congestion is problematic in Casino corridor w/ single lanes obstructed by short left turn lanes. OK

23-2



ROUNDABOUT @ LAKE PARKWAY  
 - no rational provision for walkers/  
 bikers traversing a condensed traffic  
 stream @ MONTEBELLO TO LAKE PARKWAY

23-2  
 cont.

Letter  
 23

Fritz Eriksen  
 No date, 2017

- 23-1 The commenter expresses skepticism about the increase in economic activity associated with the project and reported in the economic study if there is no new parking proposed and commercial space in the area is already maximized. A summary of the economic effects of the project are provided in Section 4.6 of the Draft EIR/EIS/EIS beginning on page 4-10, which is based on an economic study prepared for TTD by Economic and Planning Systems, Inc. The methods and assumptions used to prepare the economic analysis are described on pages 4-12 through 4-13. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.
- 23-2 The commenter asserts that traffic volumes have decreased since 2003, the project would result in congestion in casino corridor with single lanes and short left-turn lanes, and a roundabout at Lake Parkway would be a challenge for pedestrians and bicyclists. The Draft EIR/EIS/EIS includes analysis of projected traffic volumes along with intersection and roadway operations with and without the project in Impacts 3.6-2 and 3.6-3 on pages 3.6-34 through 3.6-50 and Impacts 3.6-12 and 3.6-13 on pages 3.6-86 through 3.6-104. In 2020 and 2040, with Alternatives B and D, all intersection operations and roadway segment operations would remain at acceptable levels of service throughout the project area (pages 3.6-35–3.6-37; 3.6-48–3.6-50, 3.6-87, 3.6-98–3.6-99, and 3.6-100–3.6-103). In 2020, Alternative C with implementation of mitigation would result in acceptable levels of service at study area intersections and most roadway segments, but would result in an unacceptable LOS on westbound Old US 50 between Pioneer Trail and Park Avenue during summer peak hours (pages 3.6-32, 3.6-50, and 3.6-131). In 2040, Alternative C with implementation of mitigation would result in acceptable levels of service at intersections in the study area but would result in unacceptable levels of service at a couple of roadway segments in the study area (pages 3.6-97–3.6-98, 3.6-101–3.6-102, and 3.6-133–3.6-134). Future traffic growth assumed in the Draft EIR/EIS/EIS is also addressed in Response to Comment 12-23.

Left-turn pockets throughout the tourist core have been designed to accommodate projected 95<sup>th</sup> percentile queues under reasonably foreseeable, conservative Year 2040 Summer Peak Hour conditions. Additionally, under Alternatives B and D, the number of lanes on Old US 50 between Park Avenue and Lake Parkway would decrease from two lanes to one lane in each direction. As a result, queueing times would decrease as left-turning vehicles would only need to find a suitable gap to cross one lane of conflicting traffic instead of two.

The roundabout would be designed per the national standard, the Transportations Research Board's National Cooperative Highway Research Program (NCHRP) *NCHRP Report 672, Roundabouts: An Informational Guide, Second Edition* (NCHRP 2000). Per these guidelines, sidewalks and bicycle lanes would be included at the roundabout. As shown in Exhibits 2-2 and 2-4 of the Draft EIR/EIS/EIS, the optional roundabout with Alternatives B and D would include dedicated pedestrian crosswalks and multiple pedestrian refuges at the mid-way point of the crosswalks throughout the roundabout (pages 2-7 and 2-11 of the Draft EIR/EIS/EIS). Crosswalks could also be utilized by bicyclists in the roundabout. As discussed in the analysis of pedestrian, bicyclist, and vehicle safety on pages 3.6-67 and 3.6-70 of the Draft EIR/EIS/EIS, "Roundabouts tend to reduce the severity of traffic accidents because the geometric design of the entry points eliminates right-angle collisions and high-entry speeds as well as reducing conflict points." The number of crosswalks and pedestrian refuges coupled with reduced vehicle traffic speeds in the roundabout would help facilitate pedestrian and bicyclist access through the roundabout. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.

Letter 24
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Jerome Evans  
PO Box 7101  
South lake Tahoe, CA 96158  
Jeromeevans81@gmail.com

Russ Nygaard  
Transportation Capital Program Manager  
Tahoe Transportation District  
PO Box 499  
Zephyr Cove, NV 89448

Dear Mr. Nygaard,

According to the Tahoe Transportation District's Draft EIR/EIS/EIS document dated April 24, 2017, of the four alternative loop road projects, the "Locally Preferred Action" is Alternative B: Triangle. Perhaps I am not yet a "local", as I have only lived on the South Shore for some 27 years, but Alternative B is not my preferred action. Nor, to my knowledge, has there been a poll of local residents as to their preference.

24-1

In any case, I strongly favor Alternative A: No Build.

Here is why:

1. If once there was a congestion problem through the casino corridor, that is no longer the case. Nor is there any reason to believe that congestion will be a problem in the future.

24-2

Caltrans traffic volume data show a remarkable, indeed precipitous, decline in vehicle traffic through the casino corridor from 1992 to 2014. There is a reason for this decline, and it is likely to continue with the continuing slow death of the Stateline

casinos hastened by the growth of electronic gaming and on-line gambling.

Wood Rogers predicts a substantial increase in traffic (but not VMTs!) with the construction of several proposed projects in the area, but their estimates say nothing about likely concurrent decreases as a result of declining casino business.

24-2  
cont.

2. There is no reason to believe that Alternative B will significantly improve pedestrian and cyclist safety.

The existing sidewalks from Pioneer Trail to Stateline are broad and reasonably safe. From Stateline to Lake Parkway, the existing sidewalks are narrow and primitive, but as they are lined by casinos and casino parking, they attract very few pedestrians. Paving might be a good thing.

24-3

Cyclists are not likely to find this corridor any more attractive with Alternative B than they do now. As the 2013 economic study by ECS observed, "...some of the larger casino structures themselves present a barrier of the built environment that is not necessarily welcoming to pedestrians, bicyclists, and other nonmotorized users."

3. It is not evident that the loop road will attract many drivers, as there are to be two traffic signals where there are now none. Nor is it evident that drivers who choose neighborhood streets are likely to be dissuaded from doing so when they discover the new traffic lights.

24-4

4. We do not know the true cost of Alternative B, as no real cost analysis has been done.

The cost of the project has been estimated to be \$70 million (TTD FAQ sheet) or \$65-\$85 million (Wood Rogers) depending on the alternative selected. But this did not include, among other things, the cost of:

24-5

Redesigning the roadway from Pioneer Trail to Nevada State Route 207;

Housing for relocated residents;

The bridge to the Van Sickle Park and ADA access;

Rerouting utilities;

Storm water and waste containment and treatment;

Construction of a roundabout at the Lake Parkway/US50 intersection;

Conversion of Lake Parkway West from two to three or four lanes;

Conversion of Stateline Avenue from two to three or four lanes;

Property acquisition costs.

Can't TTD come up with a current and comprehensive cost estimate? Or don't they want to?

24-5  
cont.

5. The bridge across the rerouted highway to the Van Sickle Bi-State Park is presented as an "option", but it would provide a very necessary and costly access to the park.

In order to have an ADA-compliant access from the shopping centers to the bridge, there would have to be a massive earth fill to reach the level of the bridge. All in all, the cost of the bridge and access would very likely be \$10-\$15 million or more

24-6

6. According to the ECS economic analysis of the project, it would draw business from the south end of town where there are already many struggling local businesses and empty storefronts. Yet, the probable consequence of rerouting through traffic around the Village Center and Heavenly Village shopping areas has not been addressed.

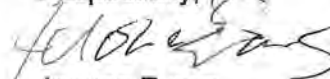
24-7

7. The much heralded "main street" is nothing more than the existing casino corridor from Stateline to Highway 207 lined with trees and with a center divide. Where are all the attractive shops and restaurants one associates with a "main street"? Not here.

24-8

All the window dressing in the world can't disguise the fact that this will be a massive and needless waste of scarce resources, tax payers' money that should be spent on important infrastructure and recreation projects that have been postponed for far too long.

Respectfully,



Jerome Evans

cc: Scott McHenry, Federal Highway Administration; Joanne Marchetta, TRPA; Justin Sass, City of South Lake tahoe.

**Letter  
24**

**Jerome Evans**  
July 6, 2017

- 24-1 The commenter expresses opposition to Alternative B and questions why it is identified as the locally preferred option if there has not been a poll of residents; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. Section 2.1, "NEPA, TRPA, and CEQA Requirements for Alternatives," on page 2-1 of the Draft EIR/EIS/EIS explains that TTD designated Alternative B as the "locally preferred action," because TTD believes Alternative B would best meet the objectives of the project and it emerged as the most supported alternative following public scoping. Please also refer to the discussion under the header "Basis for Selection of the Preferred Alternative" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," in this Final EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 24-2 The commenter asserts that congestion is not a problem through the casino corridor, and vehicle traffic is declining because of the declining casino business. The commenter also states that the environmental document predicts a substantial increase in traffic, excluding VMT, but does not address impacts on traffic resulting from declining casino business. See Response to Comment 23-2 regarding traffic congestion in the study area. As stated in the 2017 RTP/SCS, projected population growth of metropolitan areas surrounding Lake Tahoe in Northern California and Nevada "...will likely add more users to Lake Tahoe's transportation system. By 2035, the population of these surrounding areas is expected to increase by four million people. This will lead to increases in visitor trips to the Tahoe Region and increased demand on existing transportation infrastructure" (page 1-1). Regarding the future traffic growth assumed in the Draft EIR/EIS/EIS, see Response to Comment 12-23. The commenter expresses support for Alternative A. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided. The comment is noted for consideration during the review of the merits of the alternatives.



- 24-3 The commenter asserts there is no reason to believe that Alternative B would significantly improve pedestrian and bicycle safety. The commenter characterizes existing sidewalk infrastructure as adequate and asserts that bicyclists are not likely to find the corridor any more attractive with implementation of the project.
- The project would install/replace sidewalk along the entire length of both new and existing US 50, and along some local streets, within the project site, creating a complete sidewalk network along the most prominent roadways in the tourist core. All sidewalks would be brought up to current standard to meet Americans with Disabilities Act (ADA) requirements.
- Bicycle lanes, along with bicycle signage and striping, would be created on all segments of new and existing US 50. Alternative B also has an option to construct a Class 4 bikeway (i.e., cycle track), which would provide bicycles a dedicated travel way separated from traffic. The bicycle improvements would connect the Linear Park with the Nevada Stateline to Stateline Bikeway, creating a continuous bikeway from Ski Run Boulevard to Nevada Beach/Round Hills Pines Beach Resort. See Response to Comment 13-2, which elaborates on the benefits to and safety for pedestrians and bicyclists.
- 24-4 The commenter states that it is not evident that the new US 50 loop road would attract many drivers, as the new alignment contains two new traffic signals. The commenter also suggests that drivers would continue to use neighborhood streets because of the traffic lights on realigned US 50. See Response to Comment 29-3 regarding project travel times for each of the alternatives considered in the EIR/EIE/EIS. The comment is noted for consideration by decision makers.
- 24-5 The commenter asserts that no real cost analysis of all aspects of Alternative B has been done. Preliminary cost estimates for the build alternatives were prepared as part of the Draft Project Report (Caltrans 2016) and referenced on page 1-6 of the Draft EIR/EIS/EIS, which includes roadway-related items, structural items, and right-of-way acquisition. In addition to acquisition costs, the right-of-way cost estimate included in the Draft Project Report also includes estimated costs for permit fees, appraisal costs, utility relocations (e.g., electric, gas, water, sewer, cable, and telephone lines). This cost estimate is preliminary as it is based on partial completion of the project design. The estimates would be updated for the final project report. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 24-6 The commenter asserts the pedestrian overcrossing to Van Sickle Bi-State Park would provide a necessary and costly access to the park, which would require a massive earth fill to reach the level of the bridge to be compliant with ADA requirements. The Conservancy parcel between the Harrah's surface parking lot and Forest Suites Inn slopes up to the existing road, which would preclude the need to use fill material (see Exhibit 2-6 on page 2-16 of the Draft EIR/EIS/EIS). The proposed path leading to the pedestrian bridge would meander to meet ADA slope requirements. The project would receive federal funding and, as a federal-aid project, is required to build transportation facilities that provide equal access for all persons and meet ADA requirements (page 3.6-2).
- 24-7 The commenter asserts that the economic analysis found that the project would draw business from the south end of town, but the analysis does not address the consequence of rerouting through traffic around the Heavenly Village Center and Heavenly Village shopping areas. The economic effects on businesses in the study area, including the Heavenly Village Center and Heavenly Village, from changing travel patterns in the study area are described on pages 4-18 through 4-23 of the Draft EIR/EIS/EIS. The short-term and long-term effects on retail sales in the Heavenly Village Center and Heavenly Village, in light of changes in travel patterns and

other improvements that would be constructed by the project, are included in Table 4-7. As summarized on page 4-23, “The project would result in a permanent change in visibility of businesses within the project site. However, the types of transportation improvements proposed as part of the project, including complete streets improvements through the tourist core, streetscape improvements, providing expanded opportunities for events, and enhancing public transit could make the project site more attractive to visitors and local residents. These types of changes are estimated to result in a long-term increase in business activity that would exceed the short-term losses in retail sales associated with construction activities.” No further response is required.

- 24-8 The commenter asserts that the “main street” concept proposed as part of the project is simply the existing casino corridor lined with trees and a center median and the project would be a waste of resources and taxpayers’ money that should be spent on other projects. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.

**Jessica Mitchell**

**Letter  
25**

**From:** Carol Gass <cbmgass@gmail.com>  
**Sent:** Saturday, June 24, 2017 12:06 PM  
**To:** info@tahoetransportation.org  
**Subject:** Carol Gass-US 50 Relocation (Loop Road) Project

Impacts of changing Tahoe Meadows access at Hwy 50/Lake Road Requiring ALL vehicles to make a right in turn from the direction of Pioneer Trail would create a back up on Hwy 50 while vehicles wait for the cars ahead of them to use the keypad to open the Tahoe Meadows gate.

This creates a significant safety hazard for rear-end collisions due to stopped vehicles on Hwy 50. This situation is made much worse by drastically narrowing the Linear Park at Lake Road.

As a very long time member of Tahoe Meadows (since the early 1950's) I ask you to please take these concerns seriously! They would cause many problems for not only TM residents, but to the general public! Safety should take precedence!

Thank you very much,

Carol B. Gass

Sent from my iPhone

25-1

**Letter  
25**

**Carol Gass**  
 June 24, 2017

- 25-1 The commenter is concerned that changes to the Tahoe Meadows access at the US 50/Lake Road intersection would result in a safety hazard associated with queueing on US 50. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

**Jessica Mitchell****Letter  
26**

**From:** Gladding, John <john.gladding@intel.com>  
**Sent:** Wednesday, April 26, 2017 10:37 AM  
**To:** suggestions@us50revitalization.org  
**Subject:** 50 comments-John Gladding

Hi there –

I hope this is the right email address for public comments.

I really like the efforts and ideas behind the “triangle” (B) and “D” options. In particular I like the 4-lane roads. It’s my opinion we only get one shot at this and traffic / population will grow. Expanding to 4 lanes will make it easier on weekends and holidays during peak hours. I’m sure you are aware progress is difficult in this town, so I think if you are going to do it, do it for the future. I am OK with wider lanes (I think Pioneer Trail should be wider all the way down but that’s a different subject).

26-1

Personally, I think the intersection with the greatest concern is between Village Center and Heavenly Village. Many people park in Village Center and go to Heavenly for the movies or whatever and I have seen many near-misses right there with pedestrians. I don’t know the answer to this but it is a concern of mine.

26-2

John Gladding  
 2687 Armstrong Ave, SLT

**John Gladding**  
 Sr. UX Designer, IT User Experience (IT UX)  
 @jgladding74 . com@jgladding74 . com

**Letter  
26****John Gladding**  
April 26, 2017

- 26-1 The commenter expresses support for Alternatives B and D. The commenter does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 26-2 The commenter expresses concern for pedestrian safety at the intersection between Heavenly Village Center and Heavenly Village. The existing US 50 and Heavenly Village Way intersection is signalized and a pedestrian beacon, mid-block crossing is located at the Heavenly Village Center driveway on Heavenly Village Way. These facilities provide for safe pedestrian crossing, assuming that they are used properly by pedestrians and vehicle drivers are aware of their surroundings. No changes are proposed at the intersection of existing US 50 and Heavenly Village Way or along Heavenly Village Way that would change pedestrian access between the two shopping areas, with the exception of a new signalized intersection at Lake Parkway (i.e., realigned US 50) and Heavenly Village Way. Impacts on pedestrian safety throughout the study area are addressed in Impact 3.6-8 on pages 3.6-66–3.6-71 and Impact 3.6-18 on pages 3.6-120–3.6-124 of the Draft EIR/EIS/EIS. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.

**Jessica Mitchell****Letter  
27**

**From:** Gladding, John <john.gladding@intel.com>  
**Sent:** Friday, July 07, 2017 11:21 AM  
**To:** suggestions@us50revitalization.org  
**Subject:** Gladding comments on 50 realignment

I realize this is the last day for comments, but just 2 cents, whatever that's worth...

It feels like the majority of residents hate change, construction, and visitors. However you guys are doing what is necessary for the community. That said, whatever options you are presented, please think of 50 years from now when we have more residents, and more importantly, more visitors. My personal preference is whatever options provide more parking, and more lanes at Stateline.

27-1

One of your options seemed to show residential units in "Site 3" where there is parking. I think this is a poor choice, as many people park in the Village Center lot year-round. That will only get worse if we take away parking spots. If anything, put in a garage there.

While I realize we will displace homes near Stateline, there is no reason we have to rebuild at Stateline. We can always go down the road a bit. I would love to see some dumpy motels torn down in favor of nicer apartment living for these residents. We should be spreading down to the "Y" and not building near Stateline.

27-2

Just my \$.02

John Gladding  
 2687 Armstrong, SLT

**Letter  
27**

**John Gladding**  
 July 7, 2017

- 27-1 The commenter expresses support for a project that would provide more parking and lanes at Stateline and states that residential units at Site 3 would remove parking, which would be a poor choice. The loss of parking at the Heavenly Village Center, if replacement housing or mixed-use development is constructed behind Raley's, is assessed in Impact 3.6-11 (pages 3.6-80 through 3.6-85) of the Draft EIR/EIS/EIS. As discussed on pages 3.6-132 and 3.6-133, "Implementation of Mitigation Measure 3.6-11 would reduce the potentially significant impact related to inadequate parking at the Heavenly Village Center as a result of development at Site 3 because the project applicant would prepare a parking plan that would determine the parking demand at the center and identify solutions that would reduce or meet the demand and attain city parking standards... the project applicant would implement recommendations in the parking plan to meet parking demand prior to groundbreaking at Site 3 in order to avoid any interim loss of parking supply to meet demand." The comment is noted for consideration by decision makers.
- 27-2 The commenter supports constructing replacement housing closer to the "Y" and replacing some of the rundown motels with nicer apartments for the displaced residents. The commenter expresses preference for the location of replacement housing; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.

<p>Letter 28</p>
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**Bruce P. Grego**  
 Attorney at Law  
 2262 Barton Avenue  
 South Lake Tahoe, California 96150  
 Telephone: (530) 544-7575  
 Facsimile: (530) 544-7987

July 6, 2017

Russ Nygaard  
 Tahoe Transportation District  
 PO Box 499  
 Zephyr Cove, NV 89448  
[info@lahoetransportation.org](mailto:info@lahoetransportation.org)

Mr. Nygaard,

Thank you for the opportunity to comment on the Draft EIR/EIS US 50/South Shore Community Revitalization Project ("DEIR"), aka-Loop Road .

#### COMMENTS

##### LAWSUIT

The TTD has stated that the CSLT will be required to approve the Loop Road Project. A ballot measure (Measure T) was brought by the voters in November of 2016 and passed by 60%. This measure requires voter approval by the voters in SLT for the 'Project' to go forward. This measure was challenged in court and the plaintiff prevailed. This decision is currently being litigated by appeal and leaves the possibility of approval by the 'City' in question. The DEIR report fails to consider this situation.

28-1

##### ECONOMIC SHIFT:

Your Summary states: "Commercial core revitalization is intended to increase visitor spending and catalyze adjacent private construction investment." This statement fails to consider the broader economic impacts to the SLT businesses. Evidence of a shift in economic development rather than an increase in economic development was evident after the CSLT Redevelopment from Stateline to Ski Run was initiated. Today, after more than 20 years, the 'Y' is still in recovery mode from this economic shift. The net gain to the city's economic enhancement needs to be identified rather than projecting economic gains in the immediate area of the project only.

28-2

##### REAL PROPERTY TAX BASE:

The report fails to address the loss of real property value tax base for El Dorado County and the City of SLT. The 'taking' of property will result in said property going from taxable (privately owned) to non-taxable (publicly owned). The amount of the tax base loss initially could be in the tens of millions of dollars.

28-3

Letter to TTD  
Attn: Russ Nygaard  
July 6, 2017  
Page 2

#### COMPENSATION FOR VACANT LOT:

The vacant lot that borders Pioneer Trail and Hwy 50 west of the 7-11 property near Stateline is owned by the City's Remainder Redevelopment agency. Carl Hasty has stated that the city should donate that parcel to the project. The City is not in a position to donate that parcel because it is obligated to the Remainder Redevelopment Agency. The Draft Document fails to identify funding for this vacant parcel to be used to pay down the City's Redevelopment bonds.

28-4

#### PARKING:

At a public workshop a question was asked about the plan to add NO NEW parking for the project. The answer was that underutilized existing parking lots would satisfy the new demand. Parking is already overburdened during peak times. The casinos recently announced that they would start charging \$20/\$25 during holidays, the Celebrity Golf Tournament and on concert nights. This is very impactful during the busy summer season. The Village Center is so overburdened that they barely have enough parking for their current customers, employees and tenants. The parking structure (garage) at Heavenly Village exceeds capacity during peak seasons, with little or no availability for their employees and tenants. The casinos have recognized that their lots are being used by non- casino customers thus the need to charge to park in their lots. The argument that there are underutilized existing parking lots is not accurate unless you are referring to off season. This lack of planning for additional parking demands is a significant flaw in the project.

28-5

#### SOCIAL JUSTICE

There is NO social justice in taking a neighborhood of predominately ethnic minorities and running a five lane highway through the middle. Any sense of neighbor or community will be irreparable changed. The preferred alternative is the most invasive when it comes to housing. There are nearly 100 single family units (houses, duplexes and multi-family dwellings) that will be removed. The DEIR fails to discuss the community social impacts of the Project.

28-6

#### HEALTH RISKS:

For more than a decade California air quality officials have warned against building homes within 500 feet of highways and freeways. People there suffer higher rates of asthma, heart attacks, strokes, lung cancer and pre-term births. The draft report fails to assess the health risks of positioning a new highway in close proximity (well within 500 feet) of residential living units.

28-7

#### EMINENT DOMAIN

The report fails to identify who will be responsible for eminent domain. At public workshops this topic has been discussed, but never definitively determined as to what agency has eminent domain authority.

28-8

#### TREE REMOVAL AND REPLACEMENT:

More than 800 trees are identified to be removed. There is no indication that these trees will be replanted. A plan to actually provide for a site or sites to plant and maintain the replacement trees is needed along with the size of replacement trees.

28-9



Letter to TTD  
Attn: Russ Nygaard  
July 6, 2017  
Page 2

#### UTILITIES

The construction of the Loop Road will necessitate the removal and replacement of sewer, water and other underground utilities. The report fails to identify locations for the removal and replacement of utilities along with unforeseen costs. Further there is no indication of what government agency will pay for it and whether those costs will be handed down to the rate-payers or picked up by the Feds or the State.

28-10

#### HOUSING REPLACEMENT

Many of the living units to be taken in this project are single room occupancy (SRO). The draft document fails to identify the funding source for the SROs and other affordable and replacement housing.

28-11

#### LAKE TAHOE UNIFIED SCHOOL DISTRICT:

The draft report fails to identify impacts to the LTUSD as to potential loss of students through possible family relocation to other school districts. The financial impact could be significant.

28-12

#### SECTION 4(f) EVALUATION:

The draft document fails to provide a Section 4(f) evaluation.

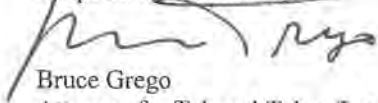
The evaluation and approval may be used only for projects where the FHWA Division Administrator, in accordance with this evaluation, ensures that the proposed action includes all possible planning to minimize harm. This has occurred when the officials having jurisdiction over the Section 4(f) property have agreed, in writing, with the assessment of impacts resulting from the use of the Section 4(f) property.

28-13

In conclusion, the issues in this comment letter should be fully addressed. Also, the SLT voters should have the right to vote on this project's approval.

Please contact me at (530) 544-7575 or [brucegrego@att.net](mailto:brucegrego@att.net) if you need further information.

Respectfully Submitted,



Bruce Grego  
Attorney for Tahoe 4 Tahoe/Let Tahoe Decide

**Letter  
28**

**Bruce Grego**  
July 6, 2017

- 28-1 The commenter states that the City of South Lake Tahoe's ability to approve the project is in question because the decision to invalidate Measure T is being litigated through an appeal. The commenter asserts that the Draft EIR/EIS/EIS does not consider this situation. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 28-2 The commenter asserts that the EIR/EIS/EIS needs to analyze the net gain to the city's economic enhancement needs rather than projecting economic gains in the immediate area of the project only. The commenter states that there was evidence of a shift in economic development after the City of South Lake Tahoe Redevelopment from Stateline to Ski Run was initiated. The economic analysis conducted for the project focused on the geographic

area that would be directly affected by the project. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.

- 28-3 The commenter asserts the EIR/EIS/EIS does not address the loss of real property value tax base for El Dorado County and the City of South Lake Tahoe because the taking of property would result in the property changing from taxable, privately-owned property to non-taxable, publicly-owned property. The Draft EIR/EIS/EIS includes an analysis of the effects of the project on property tax, sales tax, and transient occupancy tax revenues on pages 4-13 through 4-18. With respect to property tax values, as described on page 4-14, “In Fiscal-Year 2014-15, the City of South Lake Tahoe received approximately \$6.2 million in property taxes, based on a total assessed value of \$4.1 billion (Walker, pers. comm., 2016:3). The assessed value of the land removed from the tax roll from the build alternatives would represent 0.3 to 0.4 percent of the assessed value of property in the city’s tax roll.” This analysis represents a conservative estimate of the overall change in tax revenue because it only considers the removal of property when the project would also construct replacement housing, provide relocation benefits for displaced businesses that would allow them to relocate, and provide the opportunity for the construction of additional commercial floor area space and residential units. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 28-4 The commenter asserts that the EIR/EIS/EIS does not identify funding for the vacant, city-owned lot southwest of the shopping center containing 7-11. Preliminary cost estimates for the build alternatives were prepared as part of the Draft Project Report (Caltrans 2016) and referenced on page 1-6 of the Draft EIR/EIS/EIS, which includes roadway-related items, structural items, and right-of-way acquisition. This cost estimate is preliminary as it is based on partial completion of the project design. The estimates would be updated for the final project report. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 28-5 The commenter asserts that the claim that underutilized parking exists in the study area is not accurate unless you are referring to the off-season and the lack of planning for additional parking demand is a significant flaw in the project. The comment does not provide any evidence to support their claims about inadequate parking supply. Additional demand for parking would be generated by the replacement housing and mixed-use development, but these projects would include construction of parking and parking has been accounted for in the conceptual planning for each of the mixed-use development sites (see Exhibits 2-9 and 2-10 on pages 2-27 and 2-29 and Exhibits 2-11 and 2-12 on pages 2-35 and 2-37 of the Draft EIR/EIS/EIS). Permanent impacts to parking are assessed in Impact 3.6-11 (pages 3.6-80–3.6-85), concluding that “[t]he amount of parking at Heavenly Village Center and Montbleu Resort and Casino would continue to have sufficient parking to meet city and county standards and the project would provide replacement parking equal to those lost at the other [affected] businesses...” (page 3.6-81). Despite the owners of those parking lots making the choice to charge a parking fee, these parking lots are considered part of the underutilized existing parking lots. Beyond the replacement housing and mixed-use development, the project would not construct any other development that would be required to supply parking. Regardless, as described in the discussion under the header “Project Refinements to Alternative B,” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” TTD has coordinated with resort-casino property owners to improve parking availability in the tourist core through a public-private agreement between TTD and the four casinos (Harrah’s, Harvey’s, Montbleu, and Hard Rock Hotel) to promote and make available

the existing parking spaces on the Nevada side for visitors. Implementation of this parking strategy would occur prior to groundbreaking of transportation improvements.

- 28-6 The commenter expresses concern about displacing minority residents and nearly 100 residential units as a result of the project and asserts that the Draft EIR/EIS/EIS does not discuss the community social impacts of the project. The potential effects on minority residents in the Rocky Point neighborhood are also assessed in Section, 3.4.3, “Environmental Justice,” of the Draft EIR/EIS/EIS, which concludes that, in spite of project benefits and mitigation measures implemented by the project, the project would have a disproportionately high and adverse effect on minority and low-income populations in this neighborhood. See Response to Comment 13-6, which addresses the environmental justice effects of the project. Also see Responses to Comments 66-2, 66-3, and 66-4, which also address concerns related to environmental justice effects of the project.
- 28-7 The commenter expresses concern that the Draft EIR/EIS/EIS did not assess the health risks of positioning a realigned highway within 500 feet of residential land uses. Impact 3.13-4 in Section 3.13, “Air Quality” of the Draft EIR/EIS/EIS evaluated health risks associated with the proposed alignment, consistent with available guidance from applicable regulatory agencies and found that no existing or future planned residential land uses would be exposed to excessive health risk as a result of the action alternatives (pages 3.13-38 through 3.13-42). The Draft EIR/EIS/EIS acknowledges that “as a result of the new alignment, existing sensitive land uses currently not in close proximity to US 50 (e.g., residences along Primrose Road and Moss Road) would now be located as close as 100 feet to the realigned US 50” (page 3.13-38). However, the Draft EIR/EIS/EIS further explains that none of the action alternatives would result in average daily trips (ADT) that exceed 40,000, below screening criteria, designed for evaluating health risk from freeways, established by FHWA of 140,000 ADT and the California Air Resources Board of 100,000 ADT (pages 3.13-38 through page 3.13-42). The Draft EIR/EIS/EIS has evaluated health risks associated with the proposed realignment and determined that impacts would be less than significant. No revisions are necessary.
- 28-8 The commenter states that the environmental document does not identify the agency that would have eminent domain authority for the project. The guiding principles for the development and implementation of the US 50 South Shore Community Revitalization Project that have been adopted by the TTD Board summarize the commitments TTD has made thus far related to the property acquisition process (TTD 2016; see Section 2.3.1, “Replacement Housing,” on pages 2-5 and 2-6 of the Draft EIR/EIS/EIS). As identified in these guiding principles:

- ▲ Necessary right-of-way would be acquired prior to the start of road construction.
- ▲ Existing developed and occupied real estate would not be removed until project construction is funded and residential and business relocation is completed.
- ▲ The acquisition process will follow the Federal “Uniform Act” based on a willing seller basis.
- ▲ Any possible use of eminent domain by TTD would only be used if necessary to complete the needed right-of-way and would follow exact provisions of the Uniform Act.

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.

- 28-9           The commenter states that there is no indication that trees removed by the project would be replaced through replanting, and that a plan to provide for sites to plant and maintain the replacement trees is needed along with the size of replacement trees.
- See Response to Comment 12-71. The discussion of Mitigation Measure 3.16-3 of the Draft EIR/EIS/EIS (page 3.16-27) and requirement to prepare and implement a Tree Removal, Protection, and Replanting Plan applies to this comment. No further analysis is necessary.
- 28-10           The commenter states that the environmental document does not identify locations for removal and replacement of sewer, water, and other underground utilities and does not identify who would be responsible for paying for removal and replacement of utilities affected by the project. See Response to Comments 9-2, 9-3, and 9-6 through 9-8.
- 28-11           The commenter asserts that the EIR/EIS/EIS does not identify funding for acquiring SRO units and other affordable and replacement housing. Preliminary cost estimates for the build alternatives were prepared as part of the Draft Project Report (Caltrans 2016) and referenced on page 1-6 of the Draft EIR/EIS/EIS, which includes roadway-related items, structural items, and right-of-way acquisition. This cost estimate is preliminary as it is based on partial completion of the project design. The estimates would be updated for the final project report. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 28-12           The commenter asserts that the EIR/EIS/EIS does not identify impacts to Lake Tahoe Unified School District (LTUSD) as to potential loss of students through family relocation to other school districts. It would be speculative to analyze the impacts to LTUSD associated with families relocating outside of LTUSD, in part because the preferred location of the replacement housing would be within the study area, which is served by LTUSD. Displaced residents could choose to be relocated elsewhere; however, the number of residents with children that would make this choice is unknown. The project's effects on school capacity that could result in a potential adverse physical effect on the environment are addressed in Impact 3.5-7 on pages 3.5-39 through 3.5-42 of the Draft EIR/EIS/EIS. Furthermore, the comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during by decision makers.
- 28-13           The commenter asserts that the draft document does not provide a Section 4(f) evaluation. The commenter closes the letter with asserting that the issues in the letter should be fully addressed and the South Lake Tahoe voters should have the right to vote on this project's approval. The Section 4(f) evaluation for the project is included in Appendix D, "Resources Evaluated Relative to the Requirements of Section 4(f) and Proposed *De Minimis* Determination," and a summary of the Section 4(f) proposed *De Minimis* Findings are provided on pages 4-8 and 4-9 of the Draft EIR/EIS/EIS. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided. The comment is noted for consideration during project review.

**Jessica Mitchell****Letter  
29**

**From:** john@evil-genius.com  
**Sent:** Friday, July 07, 2017 1:59 PM  
**To:** Russ Nygaard  
**Subject:** Grigsby- Comments on the Draft EIR/EIS/EIS for the US 50/South Shore Community Revitalization Project

Please verify receipt. Thank you!

To: Russ Nygaard, Transportation Capital Program Manager, TTD

Re: Public comment for the "US 50/South Shore Community Revitalization Project"

I am a South Shore resident and have been for many years, living in the Stateline/Zephyr Cove area. I ride my bicycle frequently both for recreation and transporation, and I frequently ride into and out of town, directly through the proposed project area, in addition to driving through it. As such, I am one of the people most directly and frequently affected by the proposed projects, and I've spent many hours poring through the various plans on the TTD website and puzzling out their effects on myself and the community. I feel my comments are consequently of value.

#### Executive Summary

\* I agree that "no action" Alternative A is the least attractive alternative.

\* I strongly support Alternative E, the skywalk, with a few caveats and refinements re: specific features of the skywalk, such as access ramps (instead of just stairs/elevators) and creating an elevated park like the Brooklyn High Line, not just a long pedestrian bridge.

\* I strongly oppose Alternatives B-D, known as the "Loop Road". It's incredibly expensive, is guaranteed to cost far more than budgeted due to property values rising dramatically since the 2014 estimates, and provides only a marginal improvement in traffic and bicycle/pedestrian experience for nearly \$100 million (and perhaps more, given South Tahoe's history of poorly chosen redevelopment projects) while strongly impacting Van Sickle Park.

\* If a Loop Road variant (Alternatives B-D) is chosen despite this, all housing built or rebuilt within the Plan - not just the low-income replacement housing - \*must\* be permanently deed-restricted to full-time Tahoe residents, with preference given to full-time Tahoe workers and rents limited to values affordable at typical local incomes. 10,000 commute trips per day are made between Tahoe and the Carson Valley because of high housing costs (Tahoe Prosperity Center), and vehicle miles driven are the primary cause of decreasing lake clarity. Not losing existing units isn't enough.

#### Why The Skywalk?

Based on the website and the official EIR/EIS, it's clear that the Loop Road is being pushed hard and the Skywalk is being deprecated. Elaborate renderings are shown of the proposed Loop Road project (even though we have no idea what any finished developments will look like), while the Skywalk is dismissed as a "concrete bridge/pedestrian walkway."

This is a mistake. An elevated park nearly 1/3 mile long and five lanes wide means roughly \*two acres\* of sorely needed public space, right in the middle of the casino corridor - whose pedestrian experience currently consists of a narrow sidewalk between blank concrete walls and a heavy security fence. Brooklyn turned a defunct elevated train line into a beautiful public park with the High Line (see [en.wikipedia.org/wiki/High\\_Line](http://en.wikipedia.org/wiki/High_Line))...with a wider right-of-way, I'm sure we can do even better! Grass, trees, and local flowers, walkways, bikeways, and park benches, art and sculptures from local

29-1

artists, "Summer on the Skywalk" concert series...the experience here, with no traffic to disrupt it, would be far nicer than any bike paths next to a two-lane highway and interrupted by casino access can ever hope to be.

The Skywalk design does, however, require some refinement. The current plan calls for access provided only by stairways and elevators, no doubt patterned after those on the Vegas Strip. Bicycle access beneath the Skywalk will become even more dangerous than it already is with the construction of a tunnel, so access ramps for wheeled access to the Skywalk will be required.

29-1  
cont.

Fortunately, ample public right-of-way exists for this on all four corners of the site. On the southwest side, there's nothing but concrete sidewalk already, and the northwest side is occupied only by planter boxes between the shops and the street. Both the northeast and southeast sides have ample sidewalk space, as we're out of the concrete canyon by that point, so I see no problem running ramped bicycle and pedestrian access paths up and over the Skywalk. Casino and shop access mid-path will obviously require some stairways and elevators, but that is as it is.

Additionally, there is no reason that the roundabout from the Loop Road plans cannot be built at US50 and Lake Parkway in combination with the Skywalk, though I'm not sure that's enough of a traffic bottleneck on its own to justify the expense.

#### Why Not The Loop Road?

The Loop Road project is currently budgeted at \$70 to \$80 million. This is a monumental expense, and exceeds the cost of the Skywalk by over an order of magnitude (10x).

29-2

First, I note that the land value estimates that will be required to exercise eminent domain, and on which the Loop Road project budget largely rests, date from 2014. Land and real estate values in the project area have skyrocketed since 2014, with cumulative increases of anywhere from 50% to over 100%. Thus, it's already clear that the Loop Road project will cost far more than advertised.

Second, the improvements in traffic flow will be marginal at best. As far as vehicle traffic is concerned, we're paying close to \$100 million to bypass \*two stoplights\* - with the replacement route being over half a mile longer. The Skywalk alternative, despite the extra stoplight at Stateline Avenue, may well get people through town more quickly.

29-3

Third, the improvement to pedestrian and bicycle experience will be marginal at best. There will still be a road through the casino corridor, and the bicycle paths and sidewalks will still be cut through by constant casino parking access. The resulting sidewalks will be wider and less unpleasant, but they would not qualify as usable public space, as the Skywalk will.

29-4

Fourth, routing that much traffic that much farther north will dramatically increase noise levels in Van Sickle Park. The Van Sickle is a major attraction both for locals and tourists, and the increased traffic noise is not a simple "by-the-way" as the EIR/EIS states. It's a major and unnecessary blow to the most used hiking trail in South Lake - one which I spent many workdays constructing with the TRTA, and one which I enjoy frequently as a resident.

29-5

Fifth, local government and agencies have a terrible record with redevelopment projects. The Ta-hole still remains the main feature of downtown, though a facade of single-story shops (as if Tahoe were short of retail space) and "Zalanta" vacation condos masks its front side now.

The fact that former City council members have sued to stop the Loop Road and universally consider it a waste of money - and the fact that local government is so eager to push a hugely expensive project of such doubtful benefit - makes me suspicious that there is a pre-existing backroom sweetheart deal that once again shovels money out of residents' pockets and into the pockets of connected developers.

29-6

#### Conclusion



- \* Support Alternative E, the Skywalk, with refinements listed above
- \* Strongly oppose the Loop Road, for reasons listed above
- \* If the Loop Road is built anyway, all housing within the project area, not just the mitigation housing, must be permanently deed-restricted to full-time Tahoe residents, with preference given to full-time Tahoe workers and rents limited to values affordable at typical local incomes.

29-7

Thank you for your time and careful consideration,

John Grigsby  
PO Box 10897  
Zephyr Cove, NV 89448

Postscript: This isn't directly relevant to the proposed alternatives, but it's in the draft EIR/EIS, so I shall comment upon it.

On page 3.19-18, the section "Cumulative Impact 3.4-4: Cumulative change in housing supply availability" flatly states that "The Beach Club project would construct new housing and result in a total net the loss [sic] of 12 housing units. As mitigation, the Beach Club project would provide one-to-one replacement for 54 moderate income housing units."

This is partially misleading and partially outright wrong.

First, the developers of the Beach Club site raised rents at the Tahoe Shores mobile home park, which previously occupied the site for decades, by hundreds of dollars \*just before\* the "affordable housing" calculation was made. By doing this they displaced many existing low-income residents \*and\* legally avoided having to mitigate the entire project as "affordable housing." (This fact can be verified in the public comments made when the project was first opened for comment over 10 years ago.) The TRPA and Douglas County should never have accepted this morally bankrupt dodge in the first place.

29-8

Second, the "one-to-one replacement" for displaced Tahoe Shores residents involved buying existing affordable housing - the Aspen Grove apartment complex - and displacing its existing residents to make room for those displaced by the Beach Club. So this "mitigation" was entirely fake, and has accomplished nothing but displacing residents of Aspen Grove instead of residents of Tahoe Shores. Again, the TRPA and Douglas County should never have accepted this morally bankrupt dodge in the first place.

Third, the Beach Club is comprised of multimillion-dollar condominiums. Exactly zero local workers can afford to live there.

In short, the "cumulative effect" of the Tahoe Beach Club has been to dispose of over 130 units of affordable local housing (Tahoe Shores Mobile Home Park) and replace them with vacation condos, thus directly contributing to the ongoing loss of lake clarity by forcing hundreds of people to commute 45+ miles per day from the Carson Valley and back, and the destruction of the local economy by displacing full-time workers and contributors in favor of more occasional seasonal visitors.

**Letter  
29****John Grigsby**  
July 7, 2017

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- 29-1 The commenter expresses support for Alternative E and opposition to Alternatives B–D. The commenter suggests constructing the approximately 2-acre public space in the middle of the casinos along with some refinements to what is proposed. The commenter expresses support for Alternative E; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 29-2 The commenter expresses opposition for the loop road because he asserts the cost is monumental, exceeds the cost of the Skywalk Alternative, and would cost more than advertised. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 29-3 The commenter suggests that the improvements in traffic flow with Alternatives B, C, or D in place will be marginal at best, and the Skywalk Alternative may get people through town more quickly.
- A discussion of projected travel times on up to three eastbound/westbound routes between Pioneer Trail and Lake Parkway under Year 2040 Annual Average and Summer Peak conditions for all five alternatives has been included in the revised *US 50/South Shore Community Revitalization (Stateline) Project – Caltrans Project Report Traffic Operations Analysis Update* (see pages 46 through 53 of Appendix B of this Final EIR/EIS/EIS). All projected travel times are shown in Tables 23 through 26 of Appendix B. Alternatives B and D travel times on New US 50 are projected to be 107 to 167 seconds faster than Alternative A (No Build) travel times on Old US 50 under Year 2040 Summer Peak conditions. Alternative E travel times on Old US 50 are projected to be 56 to 58 seconds faster than Alternative A (No Build) travel times on Old US 50 under Year 2040 Summer Peak conditions. Alternative C travel times on the proposed eastbound and westbound US 50 alignments are projected to be up to 240 seconds slower than Alternative A (No Build) travel times on Old US 50 under Year 2040 Summer Peak conditions. Alternatives B (roundabout option), D (roundabout option), and E are projected to provide the fastest travel times overall under Year 2040 Annual Average conditions. Alternatives B (roundabout option) and D (roundabout option) are projected to provide the fastest travel times overall under Year 2040 Summer Peak conditions.
- 29-4 The commenter states that improvements to pedestrian and bicycle experience would be marginal at best as there would still be a roadway through the tourist core and driveways would cut through sidewalks and bikeways. See Response to Comment 24-3.
- 29-5 The commenter expresses concern about the project to dramatically increase traffic noise levels in Van Sickle Bi-State Park. As shown in Draft EIR/EIS/EIS Exhibits 3.15-2, 3.15-3, and 3.15-4, for Alternatives B, C, and D, respectively, the noise levels at five discrete locations in Van Sickle Bi-State Park were analyzed and the traffic noise modeling results indicate that all five of these locations would not experience an exceedance (or a considerable contribution to an exceedance) of an applicable TRPA threshold or TRPA, CEQA, or NEPA significance threshold. These five receptors include receptors 143, 144, 145, 146, and 147. More detail about the analysis of traffic noise at these receptors is provided in Tables D-14, D-15, and D-16 in Appendix K of the Draft EIR/EIS/EIS for Alternatives B, C, and D, respectively. As shown in these tables, the highest increase experienced by one of the discrete receptor locations in

Van Sickle Bi-State Park is 5 dB. As described on page 3.15-3 of the Draft EIR/EIS/EIS, a 5-dB increase is generally perceived as readily noticeable and, as explained under Impact 3.15-3, the resultant noise level would not exceed any applicable noise standards. Moreover, the values in Tables D-14, D-15, and D-16 do not reflect any noise attenuation provided by the stands of forest in Van Sickle Bi-State Park and those portions of the park more distant from US 50 would be less influenced by noise generated by traffic on US 50. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.

- 29-6 The commenter asserts the local government and agencies have a terrible record with redevelopment projects (e.g., the “Ta-hole”). The commenter states former city council members sued to stop the project and expresses suspicion of a backroom deal to benefit developers. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.
- 29-7 The commenter reiterates support for Alternative E, opposition to the loop road, and all housing in the study area, not just the mitigation housing, must be permanently deed-restricted to full-time Tahoe residents. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 29-8 The commenter asserts that the change in housing supply cumulative analysis inaccurately portrays the housing mitigation required for the Beach Club project and expresses dissatisfaction with the mitigation implemented for that project. As part of Alternatives B, C, and D of the US 50/South Shore Community Revitalization Project, the project would construct an equal number of replacement housing units as those displaced by the project prior to breaking ground on road construction on the California side of the project site. Thus, the project would maintain the number of existing housing units that currently exist and would not contribute to a cumulative loss of housing, including affordable housing, in the south shore as stated on page 3.19-18 of the Draft EIR/EIS/EIS.

**Jessica Mitchell****Letter  
30**

**From:** wcgrubbjr@aol.com  
**Sent:** Tuesday, May 09, 2017 9:09 PM  
**To:** info@tahoetransportation.org  
**Subject:** Clay Grubb-Scoping Comments on Draft Highway 50 EIS

Mr Nygaard,

I have continually supported a realignment of highway 50 around the core area. As a permanent resident, both a winter and summer user of all facilities in the project area including businesses, parks, bike commuter routes, and recreational facilities, as well as being part of a family where both adults commute to work through the area, I have seen for 16 years the increasing difficulties, dangers, and economic impediments of the current situation. As one who has visited and worked in destination recreational resort areas around the US and in Europe and Asia, I find it hard to believe that we have not yet improved our town center to reflect the obvious success of those similar areas that have separated their core attractions from voluminous through traffic. Its time to take action.

30-1

I support Alternative B (and find D acceptable as well) as the best of the remaining alternatives. It most effectively enhances the city center as well as improving and making safer the routes that all locals already use to avoid the core area.

I strongly support the pedestrian bridge into Van Sickle Bi-State Park for ALL Alternatives. It was proposed in 2004 as part of the Park trails planning, but was beyond the financial capability of the volunteer organizations that built the Park trail system. It creates a more direct route into the Park from "Explore Tahoe: The Urban Trailhead" as well from as the bus transportation center, which is the terminus for those who take the Van Sickle Connector Trail one way downhill and use the bus for the uphill start/return (reducing private vehicle "shuttle" pollution). The bridge provides more aesthetic "loop" trail options through the Park and replaces two dangerous access routes (from the Harrah's parking lot road and from the Forest Suites) that currently are unmarked crossings of a high speed road with poor sight lines. Van Sickle Park also hosts an ever increasing volume of winter users (downhill skiers and boarders from Fire Break, Gondola, and Raley's Bowl ski runs; snowshoers and cross country skiers using the Park's well marked trails; and hikers taking advantage of the intermittent snow coverage of many winters). Crossing is even more dangerous for winter users because of bad visibility, icy road conditions, and the impediments of boots and equipment.

30-2

If the objective of this effort seriously includes pedestrian and recreational safety (and I believe it does), the Van Sickle Bridge should be included in all alternatives, even A and E. Deciding not to reroute traffic only slows the increase in the already significant danger level of the existing Van Sickle access routes, it does not alleviate the problem.

Thanks,  
Clay Grubb

949-795-8035  
wcgrubbjr@aol.com

**Letter  
30****Clay Grubb**  
May 9, 2017

- 30-1 The commenter expresses support for Alternatives B and D as they would most effectively enhance the city center as well as improve the routes that locals already use to avoid the tourist core. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 30-2 The commenter expresses support for the pedestrian bridge crossing into Van Sickle Bi-State Park and enumerates the benefits this feature would provide, including creating a direct route from the transit center, replacing dangerous crossings from the Harrah's parking lot road and the Forest Suites Resort, and providing a safe crossing for winter recreation users. The commenter also suggests including the crossing into Alternatives A and E. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.

**Jessica Mitchell****Letter  
31**

**From:** Ann Harmon <abh@charter.net>  
**Sent:** Tuesday, May 30, 2017 1:09 PM  
**To:** suggestions@us50revitalization.org  
**Subject:** Ann Harmon Alternative A

Alternative A is **no build!!!** and the only one possible to support.

1. This is a “phony” project which will be obvious when those who gain financially will be revealed.

2. What problems do the current route present and how to cheaply resolve:

- a. remove the mid-corridor light. People can walk a block to cross!!! Might encourage business!
- b. utilize underground or overhead access if considered necessary. An overhead route is far cheaper than this phony project
- c. remove walking access across intersection of Hwy 50 and Lakeside. It’s seldom used and is a holdup.

3. What problems are presented by a highway around the casinos?

- a. air pollution near our wilderness areas
- b. noise pollution from fast traffic
- c. **loss of “country” feeling by visitors who are trying to get away from highways!**
- d. financial loss by taxpayers!! No gain!!!

Best to those who sensibly turn down this project,

Ann Harmon  
[abh@charter.net](mailto:abh@charter.net)

**Letter  
31**

**Ann Harmon**  
 May 30, 2017

- 31-1 The commenter expresses support for Alternative A; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 31-2 The commenter provides alternative suggestions for improvements in the study area, including removing the mid-corridor light, utilizing underground or overhead access, and removing pedestrian access across US 50. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 31-3 The commenter describes problems that would occur with realigning the highway around the casinos, including air pollution, noise pollution, loss of “country” feeling by visitors, and financial loss of taxpayers. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.

Letter  
32

Tahoe Transportation District  
Public Comments  
2 June 2017

US 50 Community Revitalization Project  
EIS/EIS/EIR Public Hearing Public Comment

1. Richard & Sherril Haynes are long-term residents of the Tahoe Meadows Historic District (Richard 1963-present) (Sherril 1952-present)
  - a. Our Property is a Historic Property
2. The Haynes Property is on Cedar Road (immediately parallel to Highway 50) between the closed Lodge Road Intersection and the Lake Road Intersection.
3. We have two specific concerns about the EIS/EIS/EIR: Access to the Tahoe Meadows Historic District and Public Safety

Tahoe Meadows Historic District Access

1. Emergency Access
  - a. Emergency Access to the Historic District Requires the Availability of Center Lane Left Turn Access onto Lake Road
    - i. Personal Experience in September, 2015 verified the importance of this access
    - ii. Fire Vehicles are in specific need of this access
    - iii. Emergency Fire Evacuation specifically requires this access/exit intersection
  - b. Lodge Road Emergency Access
    - i. The Lodge Road Gate is an Emergency Access Intersection which would be imperative during a Fire or similar Emergency for Access/Evacuation
2. Contractor, Sanitation and other large vehicle/trailer access
  - a. During our July, 2017 Garage Construction large vehicles were in need of the Central Lane for Left Turn Entry and Access due to their large size
  - b. Sanitation Trucks/Delivery Trucks/Trailers use the Center Left Turn Lane for access and exit of the District

32-1

Tahoe Meadows Historic District Lake Road Intersection Safety Concerns

1. These comments are made as a concerned resident and long-term practicing Orthopaedic Surgeon who for over 30 years was a spokesperson for the American Academy of Orthopaedic Surgeons addressing Public Safety issues (Playground Safety, Hip Fracture Prevention, etc.)
2. The Lake Road Intersection is heavily utilized particularly during high Visitor Seasons
3. The Center Lane Left Turn Entry and Exit of the Tahoe Meadows Historic District is currently the safest entry/exit of the District
  - a. The Right turn entry from Highway 50 has been the site of all Road Accidents known to this observer
    - i. The Right turn Entry requires a significant slowing of high speed traffic and attention of all following vehicles

32-2



- ii. The Right turn entry is prohibitive for all large vehicles/trailers
  - b. The Right turn Exit for Eastbound Traffic requires U turns or other correction of direction
- 4. The proposed Linear Park Reduction will specifically compromise the safety of any Entry/Exit of the District
  - a. Although there are stop signs on the walk/bicycle way, these are essentially never observed
    - i. Safety has been ensured by the diligence of the District Residents/Visitors who utilize the entry/exit Linear Park Space to ensure Safe entry/exit
    - ii. Reduction of this Space would compromise the Safety of Entry/Exit of the District
  - b. The proposed additional merging lane onto Highway 50 will magnify the problem of Safe Entry/Exit from the Right turn lane

32-2  
cont.

Respectively Submitted,

Richard J. Haynes, MD  
3935 Cedar Avenue  
South Lake Tahoe, CA 96150

602.301.5404  
[rjhssh@gmail.com](mailto:rjhssh@gmail.com)

**Letter**      **Richard J. Haynes**  
**32**          June 2, 2017

- 32-1      The commenter asserts that availability of the center lane left-turn access onto Lake Road is required by emergency vehicles, garbage trucks, and delivery trucks and the Lodge Road is access must be maintained for emergency access and evacuation. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 32-2      The commenter elaborates on safety concerns for the Lake Road intersection, right-turn entry into Tahoe Meadows, and narrowing of the Linear Park. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

Letter  
33

DEAR TTD  
REGARDING THE SOUTH SHORE  
PROJECT (LOOP RD) I'VE BEEN  
A HOMEOWNER AT 1038 MOSS RD  
WEST SIDE OF MOSS. FOR THE  
PAST 8 YEARS, I BELIEVE  
THAT ALTERNATIVE D WOULD  
BE THE BEST PLAN FOR THE  
LOOP RD PROJECT. I BELIEVE  
THAT THE HOTELS AT THE  
CORNERS OF PIONEER, ECHO, FERN,  
AND MOSS HAVE SEEN BETTER DAYS.  
I HAVE ENCLOSED PICTURES AND  
ADDRESS OF HOMES ON FERN +  
ECHO THAT HAVEN'T IMPROVED  
IN ALL 8 YEARS I HAVE LIVED  
HERE.

33-1

Plan D would affect the  
 least amount of parcels and  
 property to be purchased, the  
 fewest trees to be cut down  
 environmentally. The D plan would  
 eliminate the houses that can't  
 be helped and leave some of the  
 working class community intact.  
 The road would run next to rallies  
 and lead to more shopping +  
 commercial businesses. There  
 are many people that need to  
 stay in this area due to walking  
 to jobs and shopping in the  
 state line area

33-1  
 cont.

Plan D  
 is the answer

Thank you,  
 Michael Howard

my  
House  
1038  
moss  
A+B



PLAN D WOULD KEEP THESE  
HOUSES ON THE WEST SIDE  
OF MOSS RD. WELL MAINTAINED  
BY OWNERS



33-2



33-2  
cont.



VACANT  
LOT  
BEHIND  
TRAVELER  
HOTEL



WITH PLAN D THE NEXT 3 PAGES OF  
HOUSES AND THE 3 HOTELS ON PIONEER  
WOULD BE REMOVED. ALTERNATIVE D

33-2  
cont.

1014  
ELCH





1018  
ECHO

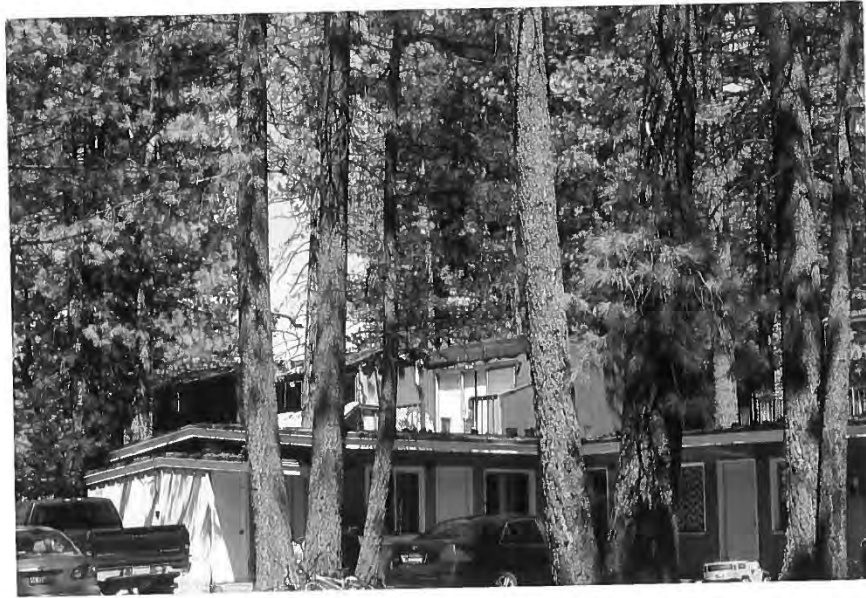


I BELIEVE THESE TRAILERS AND STORAGE  
LOCKERS WITH TARPS, MAY HAVE TENANTS

33-2  
cont.

1028  
ECHO





THIS GREEN COMPLEX RUNS A FULL  
BLOCK ON THE EAST SIDE OF ECHO 1031  
AND YOU CAN SEE BY THE TARPS IT  
HAS PROBLEMS

ALTERNATIVE D

33-2  
cont.

3749  
Primrose





ECHO ST NEAR 1018 ECHO

THIS HOUSE IS EMPTY ON ECHO



33-2  
cont.



THIS HOUSE IS FALLING APART  
ON THE CORNER OF PRIMROSE AND  
ECHO

8 PLEX

ALTERNATIVE D

1036  
FERN



33-2  
cont.

PRIMROSE  
+  
FERN  
RENTAL



THIS RENTAL HASN'T BEEN TOUCHED  
IN YEARS,

THESE BLUE + WHITE HOUSES ON FERN HAVE  
BEEN CRACK HOUSES FOR YEARS. SOME OF THE  
WINDOWS DON'T HAVE GLASS. THE LANDLORDS + TENANTS

1039  
+ 1041  
FERN



SHOULD  
LEAVE  
THE  
STATE,

33-2  
cont.

**Letter  
33**

**Michael Howard**  
no date, 2017

- 33-1 The commenter resides at 1038 Moss Road. The commenter offers support for Alternative D, because (1) the hotels at the corners of Pioneer Trail, Echo Road, and Fern Road and certain residences along Fern and Echo Roads have not improved their property in the last 8 years; (2) it would affect the fewest number of parcels; (3) it would remove the fewest trees; and (4) it would leave some of the working class community intact. The commenter includes a series of five photos showing the purported well-maintained properties along Moss Road that would be retained if Alternative D were implemented. The next seven photos show properties that would be removed with Alternative D. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 33-2 The commenter includes photos with narrative describing the condition and occupancy of the properties shown. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.

**Jessica Mitchell**

**Letter  
34**

**From:** Debra Klee <debraklee@icloud.com>  
**Sent:** Sunday, May 14, 2017 11:20 AM  
**To:** info@tahoetransportation.org  
**Subject:** Hwy 50 - Debra Klee

Hi

The task ahead with Hwy 50 IS a challenge and a lot is at stake with the Environment and Quality of life at stake. Progress is not always a good option when risks out weigh benefits

Tahoe is a mountain town, we Do Not want a CITY. Visitors I think t got are the main driver for proposed development. I use to live in Bay Area, great example where development got out of hand

Yes something needs to be done with Hwy 50. This is a project that needs to move slowly and cautiously.

The best solution would have been that Tahoe became a State Park years ago to protect and perserve Tahoe's one the most beautiful places on earth.

You face a road of a lot of opposition- we the people who live here will take a strong stand to protect it

I am core volunteer with Keep Tahoe Blue, we removed almost 700 pounds of garbage at Spooner Summit, left behind people who obviously have no value for the environment - Urbanites!

I do Not support 8 lane road for Hwy 50 - 4 lanes each way. Here is an analogy- the bigger a women's purse the more stuff that gets stuffed into this small place leading not being able to find things. Do we want to crowd out the Forrest, meadows, and wildlife who dominated this land before us

Debbie

Sent from my iPhone

34-1



**Letter  
34**

**Debbie Klee**  
Mary 14, 2017

34-1

The commenter expresses concern about the potential effects of development on the character and environment of Tahoe as a mountain town and asserts that turning Tahoe into a State Park would have been a good solution to protect and preserve the lake. The commenter describes their experience collecting garbage at Spooner Summit as a volunteer with Keep Tahoe Blue. The commenter does not support an eight-lane road for US 50; none of the alternatives considered in the Draft EIR/EIS/EIS consider such an alternative. It does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during the review of the merits of the alternatives.

Jurg Lang, Architect, 1546 Chastain Pkwy, Pacific Palisades, CA 90272

310 459 9

**Letter  
35**

Mr. Russ Nygaard  
TTD Program Manager  
PO Box 499  
Zephyr Cove, Nevada 89448

[Info@tahoetransportation.org](mailto:Info@tahoetransportation.org)

July 3, 2017

Dear Mr. Nygaard,

I have reviewed the ***EIR for the US50 South Shore Community Revitalization Project*** and herewith submit the following observations:

The project and the EIR fail to address the impact on the access situation of the Tahoe Meadows community and the intersection of US50 and Lake Road at the west end of the study area.

This community is home to approximately 100 housing units generating a substantial traffic load for ingress and egress to and from US50.

Alternatives B and C in their present design of intersection 3 (US50/Pioneer Trail), and due to their positioning extending to the west end of the study area as well as the extended right turn merger lane US50 south, create an immediate and dangerous conflict with the access to and from Lake Road. The elimination of left turns to and from Lake Road will double the amount of right turns in and out of Tahoe Meadows. Right turns into Lake Road have often backup at the gate, which will place stopped cars into lanes of US50 south at the point where the merging cars merge into the through lanes or immediately thereafter. This will greatly increase the potential for rear end collisions. Cars entering Tahoe Meadows from west or south, no longer being allowed to turn left, will have to approach Lake Road via Pioneer Trail. At the point where they must slow down to turn right into Lake Road, they will need, within a short distance, to cross the accelerating traffic on the HW50 southbound merger lane and through lanes which additionally will create a high potential for collisions.

Exiting Tahoe Meadows on Lake Road will create additional problems. The new left bend on southbound US50 leaving intersection 3 will make it hard to see oncoming cars from the left for cars exiting from Lake Road. High speeds and uninterrupted traffic flow on HW50 will make it extremely difficult to complete a safe right turn on to US50 from Lake Road. We do not have any information if or how the traffic is regulated on the right turn merger. This, however, is a most critical issue impacting access at Lake Road.

In the past, the Tahoe Meadows community had 3 full access points. Over the years, access was reduced to one single entrance and exit point at Lake Road with two emergency exits and entrances. The

35-1

Page 2

Jurg Lang (continued)

proposal reduces the Lake Road access to right in and out turns only, which as described above, are unsafe and problematic, and certainly a most inconvenient hardship.

Based on this evaluation I request the following:

1. An appropriate distance must be created between the new intersection and Lake Road. This is not possible in Alternatives B and C. Therefore, Alternative D should be selected.
2. The right turn merger from old US50 to US50 south needs to be redesigned and signalized to slow the traffic. The merger lane should be shortened, signalization introduced to create stop and yield and to create traffic gaps. Generally, the project's stated concept is to reduce the speed and traffic volume through the center, and it is contradictory to design this right turn leg of the intersection for uninterrupted flow and high speed.
3. The median should be reopened to allow left turn entry and exit to and from Lake Road.

I support the overall concept, but ultimately it must function properly. At present this situation at Lake Road has been overlooked and the design of intersection 3 is severely flawed with detrimental impact on the adjacent community. It is the responsibility of the Transportation Department to remedy the situation and make it work.

Sincerely



Jurg Lang  
Architect

Professor Emeritus for Urban Design UCLA

35-1  
cont.

**Letter**  
**35**

**Jurg Lang**  
July 3, 2017

35-1

The commenter asserts that the Draft EIR/EIS/EIS does not address potential traffic, safety hazards, and emergency access issues associated with changes to circulation patterns near the entrance to Tahoe Meadows. The commenter provides suggestions for redesigning the roadway near the Tahoe Meadows entrance to address these issues. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell****Letter  
36**

**From:** blindsey@redshift.com  
**Sent:** Thursday, July 06, 2017 10:03 PM  
**To:** info@tahoetransportation.org  
**Cc:** ronaldyank@sbcglobal.net; cathi.sweeney@gmail.com; scottc46@yahoo.com  
**Subject:** Lindsey- Hwy 50 EIR comments

Dear Tahoe Transportation District,

My wife and I are property owners at 3980 Meadow Road, South Lake Tahoe, in the Tahoe Meadows Historic District ("TM"). We are alarmed at and object to several of the proposals concerning the Loop Road project, namely:

1. Elimination of left turns in and out of Lake Road at Highway 50.
2. Constricting the Linear Park space for Lake Road ingress and egress at the TM gate.

Requiring a right turn out of the TM gate will force cars to make a U-turn at Wildwood (if permitted) or to traverse the Wildwood neighborhood to Pioneer trail. The first option seems foolish in light of what one presumes to have been an extensive, multi-year expenditure of planning resources, and the second option, in addition to tripling the driving distance and time to the Heavenly area or Nevada destinations, forces an increased traffic load on an otherwise quiet neighborhood street. Eliminating a left turn into the TM gate is similarly puzzling, as wither forcing a questionable U-turn at Pioneer Trail or a traverse through the Wildwood neighborhood.

While the Loop Road proposals may provide some benefits for overall congestion, they will increase congestion and danger at the Lake Road gate. Currently, that gate has barely room for one car to operate the gate code device, even while straddling the current Linear Park sidewalk, so reducing the Linear Park may require a car at the gate code device to extend out into Highway 50, and would certainly force cars waiting to enter the gate to stage on Highway 50. As it is, Highway 50 traffic westbound from the Pioneer Trail light is accelerating on a downslope path as it approaches the Lake Road entrance. The Linear Park reduction proposal make no sense in logic or in safety.

None of these options seem well-thought out. Indeed, they seem to be afterthoughts to the main part of the project, perhaps to satisfy objections of other constituencies, but at the same time creating greater problems for those residents, visitors, tradespeople, utilities, and others who need to enter and leave the Tahoe Meadows Historic District.

Very truly yours,

Lucien Bruce Lindsey  
 Elizabeth P. Lindsey

36-1

**Letter  
36**

**Lucien Bruck and Elizabeth P. Lindsey**  
 July 6, 2017

36-1

The commenter expresses concern that the project would eliminate left turns in and out of Lake Road at US 50 and constricts the Linear Park space for Lake Road ingress and egress at the Tahoe Meadows gate. The commenter asserts that these changes proposed by the project would cause increases in traffic congestion and safety issues. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell****Letter  
37**

**From:** Julie Martin <juliemart@gmail.com>  
**Sent:** Wednesday, July 05, 2017 3:06 PM  
**To:** info@tahoetransportation.org  
**Subject:** J Martin-Comments on US 50/South Shore Community Revitalization Project DRAFT EIR/EIS/EIS

To Whom It May Concern,

I am writing to express my concerns about the US 50/South Shore Community Revitalization Project.

**1. Realignment of the Linear Park creates a traffic impact at the entrance to Tahoe Meadows Historic District.** The proposal to move the linear park closer to the Tahoe Meadows fence will narrow the driveway for cars to turn into Tahoe meadows so that traffic will need to slow or stop for cars to be able to turn into Tahoe Meadows Historic District. This will block pedestrians and cars, increasing the risk of potential conflict between cars, bicyclists, and pedestrians,. This is in direct conflict with the one of the stated purposes of this project that is to "improve vehicle, pedestrian, and bicycle safety." This impact would be easily avoided by maintaining the current alignment of the linear park.

37-1

**2. Uninterrupted emergency access on Lodge Road must me maintained.**

It is essential that emergency vehicle access via Lodge Road be maintained. This is consistent with the purpose of this project to "improve safety for residents, pedestrians, and bicyclists in local neighborhoods". Though the EIR/EIS indicates that "the emergency access to Tahoe Meadows on Lodge Road and access to the Holiday Inn Express would be maintained" the development of Site 1 in alternatives B and C blocks the connection between Lodge Road and the street. It is unclear whether alternative D maintains connection between Lodge Road and the street.

37-2

**3. Limiting left-turn access to Tahoe Meadows Historic District would also create a traffic impact.** Limiting left-turns across the existing highway 50 will make access to Tahoe Meadows Historic District difficult. Thus, it is important that, if left-turn access is limited, one of the proposed left-turn pockets provide access to a turn into and out of the Tahoe Meadows main gate at Lake Road and Highway 50.

37-3

Sincerely,

Julie Martin  
 3960 Cedar Rd.

**Letter  
37**

**Julie Martin**  
 July 5, 2017

- 37-1 The commenter asserts that the realignment of the Linear Park would create a traffic impact and a risk of potential conflicts between cars, bicyclists, and pedestrians by narrowing the entrance driveway at Tahoe Meadows Historic District. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 37-2 The commenter states that uninterrupted emergency access on Lodge Road must be maintained, and questions whether the development of mixed-use development Site 1 with Alternatives B, C, and D would maintain the connection between Lodge Road and the highway. As described in the last sentence of the second full paragraph on page 3.4-23 of the Draft EIR/EIS/EIS, the "emergency access to Tahoe Meadows on Lodge Road and access to the Holiday Inn Express would be maintained." If Alternative B or C were approved, then access would be provided through Site 1. If Alternative D were approved, the access would be provided through the remaining ROW adjacent to US 50. In either case, access to Lodge Road would be incorporated into the final design plans to be completed subsequent to project approval.
- 37-3 The commenter asserts that limiting left-turn access to Tahoe Meadows Historic District would also create a traffic impact. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell****Letter  
38**

**From:** Erin McCune <erinmccune@gmail.com>  
**Sent:** Tuesday, June 27, 2017 6:42 AM  
**To:** info@tahoetransportation.org  
**Subject:** Erin McCune-Comment re: US 50 Relocation (Loop Road) Project EIR

Attn: Russ Nygaard, TTD Program Manager

My family and I have a home at Tahoe Meadows. Over the past 40+ years I have visited South Lake Tahoe in the summer and the winter, when it is crowded on peak weekends as well as during quieter seasons. Over the years there have been many improvements to the area related to public transportation, pedestrian friendly design, and a gradual increase in bike lanes. I applaud these efforts.

However, I have two concerns related to the EIR for the Hwy 50 Relocation (Loop Road) Project.

The Linear Path parkway and bike lane are enjoyed by our community as well as the broader resident and visiting community. The proposed alternatives B C and D dramatically reduce the width of the park - this in turn dramatically reduces the space for cars and other vehicles entering and exiting Tahoe Meadows. This endangers cyclists and pedestrians, as cars waiting to turn on to the highway or use the keypad to open our gate will block the path.

My second concern relates to the ease of entering and exiting our community if the left in/left out turns are eliminated. This will cause those entering from the West to have to overshoot the gate, do a u-turn, then return and make a right turn. Upon exiting and wanting to go to the Raley's shopping center, one would have to turn right, make a u-turn and the next light, then head past the entrance on the way East toward Stateline. This is inconvenient to the residents, visitors, and various workers/service people that drive in and out of Tahoe Meadows. In addition, due to the reduced width of the linear parkway, there is no place for cars making the right turn to wait for the driver of the car ahead of them to use the keypad. Waiting cars will likely cause delays and perhaps even accidents if they pause in the right Hwy 50 traffic lane.

Thank you for your attention to these matters.

Do not hesitate to contact me if you have any questions.

- EMc

Erin McCune  
 (415) 484-2330  
[erinmccune@gmail.com](mailto:erinmccune@gmail.com)

**Letter  
38**

**Erin McCune**  
 June 27, 2017

- 38-1 The commenter provides introductory information about the commenter's history in Tahoe and asserts that Alternatives B, C, and D drastically reduce the width of the Linear Park, which in turn reduces the space for cars at the entrance gate to Tahoe Meadows and endangers bicyclists and pedestrians. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 38-2 The commenter relates to the ease of entering and exiting Tahoe Meadows if the left-in/left-out turns are eliminated, as well as the width of the Linear Park and the potential adverse effects of vehicles queuing onto US 50. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell****Letter  
39**

**From:** Marc Mejia <marcmejia@yahoo.com>  
**Sent:** Wednesday, April 26, 2017 6:23 PM  
**To:** suggestions@us50revitalization.org  
**Subject:** Marc Mejia Village center question

Hello,

I was wondering why there is no alternative for the loop road to travel through the village center (raleys shopping center). It seems it would be much easier to get approval for the road if it did not require bulldozing ~80 homes, displacing residents, and add a 4 lane freeway through a residential neighborhood and the required eminent domain. Instead, the project could acquire the village center and raze an old shopping center (even though it was recently given a new facade, it's still old) and run the road through the parking lot/raleys. I am sure this has been suggested or considered, I am just curious why this is not feasible.

39-1

Thanks,  
 Marc

**Letter  
39**

**Marc Mejia**  
 April 26, 2017

39-1

The commenter questions why none of the alternatives considered go through the Heavenly Village Center, further stating that it would not require bulldozing homes, displacing residents, or aligning a four-lane highway through a residential neighborhood.

The Draft EIR/EIS/EIS did not consider an alternative that would route a realigned US 50 through the Heavenly Village Center because of its important role as an amenity for visitors and local residents, many of which are within walking distance; source of employment; potential for greater environmental impacts; and contributions to the local economy.

The Heavenly Village Center is a visitor- and community-serving center that provides an essential role in the community. The Heavenly Village Center is a successful shopping center that enjoys considerable patronage, low vacancy, and is an established and popular shopping destination for both local residents and visitors to the South Shore and Stateline area (TTD 2013:52). Approximately 30 shops and amenities are located in the center, including a Raley's grocery store, hardware store, retail stores, a fitness center, and restaurants. With a large number of businesses and a Raley's grocery store, this shopping center provides employment for a large number of people, Raley's alone employs an estimated 75 people (City of South Lake Tahoe 2017:162). Combined, the two Raley's in South Lake Tahoe (the one in the Heavenly Village Center and the one at the wye) are considered the tenth largest employer in the city. It is estimated that, combined, the other businesses in the Heavenly Village Center employ at least as many as employees as those that work at Raley's. An alternative that would route US 50 through the Heavenly Village Center could result in the loss of a substantial number of jobs for local residents.

Raley's is the only grocery store in the high-density tourist core, and within walking distance of Tahoe's primary bed base, that serves local residents and visitors. The nearest grocery stores to this area, Safeway in Round Hill and Safeway in midtown South Lake Tahoe, are



between 2 and 4 miles away, respectively. Removal of the Raley's at the Heavenly Village Center would result in increased vehicle trips, VMT, and GHG emissions associated with residents, including those in the Rocky Point neighborhood, and tourists having to access more distant grocery stores.

The assessed value (AV) of property removed from tax rolls in California by the build alternatives considered in the Draft EIR/EIS/EIS would range between approximately \$11 million and \$14.4 million (see Table 4-3 and the analysis on pages 4-13 through 4-16 of the Draft EIR/EIS/EIS). The AV of the Heavenly Village Center was over \$25 million in 2017 (County of El Dorado 2018). An alternative that would pass through the Heavenly Village Center could remove the property and associated businesses, resulting in the loss of property tax revenues for local agencies associated with the AV of this property, which is greater than the loss of property taxes that could occur under Alternatives B, C, or D. Similarly, removal of the Heavenly Village Center would also reduce sales tax revenues that would be paid to local agencies.

- Removal of the Heavenly Village Center would also remove a source of parking in the tourist core. Any alternative that would bisect this property would result in a loss of parking. The supply of parking in the tourist core is perceived as lacking. Although the parking at the Heavenly Village Center serves patrons of its own businesses, the loss of any supply of parking in this area would be a concern for local residents and visitors.

Letter  
40

# John Messina

**RE: Proposed Loop Road Project**

## **Three reasons to oppose the Welfare Housing Component**

### **1 - SAY NO TO THE LOOP ROAD WELFARE HOUSING COMPONENT**

Did you know that Douglas County is using it's property in this prime real estate area to build a entertainment complex that will generate millions of dollars for them while in South Lake Tahoe the Tahoe Transportation District wants to use its property (the most valuable property in the county) along the Loop Road project for welfare housing that will generate no tax or other revenue for the local budget and will ultimately increase taxes for all other

40-1

### **2 - SAY NO TO THE LOOP ROAD WELFARE HOUSING COMPONENT**

South Lake Tahoe already has more welfare housing than is recommended by the state, yet the Tahoe Transportation Districts plans would increase it by 50%. This housing will generate no property tax benefits for the local budgets while increasing demands for public services and raising taxes for all other property owners. For meeting schedule see #1

### **3 - SAY NO TO THE LOOP ROAD WELFARE HOUSING COMPONENT**

The proposed welfare housing will increase South Lake Tahoe school enrollment by around 600 additional students without providing one cent of additional school funding to our already underfunded school system. This will force other property owners to compensate by paying higher property taxes or school funding add ons. For meeting schedule see #1

40-2

John Messina, PO Box 7115, SLT, CA 96158

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**Letter  
40****John Messina**  
no date

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- 40-1 The commenter states that Douglas County is using its prime real estate area to build an entertainment complex and that in South Lake Tahoe TTD wants to use the most valuable property in the county to build welfare housing that will generate no tax or other revenue for the local budget and will increase taxes for all. The commenter also states that South Lake Tahoe has more welfare housing than recommended by the state, and yet TTD's plans would increase it by 50 percent. The commenter provides no information to support these claims. The mixed-use housing proposed as part of the US 50/South Shore Community Revitalization Project is replacement housing for housing units displaced by the highway realignment. As discussed in Section 2.3.1, "Replacement Housing," of the Draft EIR/EIS/EIS, TTD would replace all multi-family and single-family residential units that it acquires for road right-of-way purposes with multi-family residential units. See Response to Comment 66-4 for further information regarding replacement housing. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 40-2 The commenter asserts that the proposed welfare housing will increase South Lake Tahoe school enrollment by around 600 additional students without providing additional funding to our already underfunded school system. The commenter provides no information to support this claim and the number of students identified by the commenter as being generated by the project is incorrect. As described in Section 3.5, "Public Services and Utilities," of the Draft EIR/EIS/EIS (Impact 3.5-7), the mixed-use housing component of the project could generate between 47 and 49 additional students. The majority of the mixed-use housing units would be replacement housing for residential units displaced by the highway realignment. New students generated by the project were estimated using a student generation factor available for El Dorado County.

Letter  
41

John Messina

PO Box 7115, South Lake Tahoe, CA 96158

Russ Nygaard, Transportation Capital Program Manager  
TTD  
PO Box 499, Zephyr Cove, NV 89448  
info@tahoetransportation.org

July 6, 2017

RE: Loop Road Project Draft EIR/EIS/EIS For Public Hearings  
AKA: US 50/South Shore Community Revitalization Project

This proposal is wrought with many environmental problems that have been ignored in the Draft EIR/EIS/EIS For Public Hearings (draft).

**The TRPA IS SUPPOSED TO TAKE INPUT FROM ALL FORMS OF PUBLIC COMMENT**, yet has ignored the 2,852 voters who opposed the Loop Road Plan by supporting Measure T. This was over 60.5% of the voters.

**The TRPA HAS ALSO ENGAGED IN PREFERRED TREATMENT**

The TRPA plan would evict and destroy the homes of 50-60 lower income residents near Pioneer Trail. At the same time the plans to modify the Loop Road could have also eliminated the dangerous curve by cutting across an undeveloped portion of the Edgewood Estate from the beginning of the curve behind Montbleu Resort Stateline to near the intersection of Hwy 50 and Kingsbury Grade. This safety issue was apparently ignored to avoid raising the ire of the wealthy Edgewood estate.



41-1

41-2

It is also pretty obvious that Vail Properties, Heavenly Resort and other casinos and commercial properties must have had some comment or opinion on the proposed project, yet none appears on the public record.

#### **LACK OF PUBLIC INPUT**

The meetings were poorly advertised and scarcely attended by members of the public. The meeting times (mostly 8:00-9:30 AM) is very inconvenient for hourly wage earners.

#### **The last minute change in the meeting schedule on June 28, 2017.**

As I was not aware of the change in the normal agenda, I missed the bus tour.

I therefore would like to obtain a copy of the video or other record of that portion of the meeting so I will know what discussions occurred.

41-3

### **STATED GOALS:**

#### **IMPROVE SAFETY FOR ALL TRANSPORTATION MODES**

##### **SKYWAYS - A BETTER SOLUTION TO THE HWY 50 CASINO CORRIDOR**

Reno found a very successful solution to the issue of visitors crossing the streets around the casinos - skyways. This would also be the best solution for the South Lake Tahoe's Stateline casinos. A skyway between Harvey's and Harrah's casinos and a second one between Montblea and the Hard Rock would allow patrons to cross Hwy 50 without dodging traffic or foul weather. This would not only eliminate the need to re-route Hwy 50 around the casinos, it would also increase the floor space available for commercial use in the casinos. Of course the casinos may like the Loop Road alternative because the Loop Road concept passes the expense onto the taxpayers and would save the casinos the construction costs.

41-4

I commute to Carson City frequently and find that going around the casinos on the Loop Road very annoying and dangerous to say the least.

In addition, making the current highway a mall would deprive locals of the optional bypass they currently use and add an unnecessary sharp curve to the highway.

The mall would also probably have devastating effects on the small shops that currently benefit from visitors seeing items in their windows as they drive by and encourage them to come in and shop. Sacramento made the mistake of turning K Street into a mall there and it became a devastated wasteland and all of the businesses went broke.

41-5



#### ANOTHER ALTERNATIVE - SUBWAYS

At least one subway already exists between Harvey's Casino and Montbleu Resort Stateline. This is underutilized due to the fact that both casinos have camaflogged it instead of making it clear to tourists that they can cross the street without even going outside.

41-6

#### REDUCE NEIGHBORHOOD "CUT-THROUGH" TRAFFIC

The neighborhood traffic problem could easily be eliminated at a very limited cost by simply closing Monterey Rd. completely at some point between Heavenly Village Parkway and Fern Rd. behind the Raley's supermarket. Residents of the Rocky Point and nearby neighborhoods can easily access the shopping center by utilizing Pioneer Trail if they so desire.

41-7

The Loop Road (Lake Parkway) would also still be accessible by using Heavenly Village Parkway. There is no beneficial reason to keep Monterey Road open. This would eliminate the need to evict 50-60 residents and the additional costs involved with acquiring property and relocating residents.

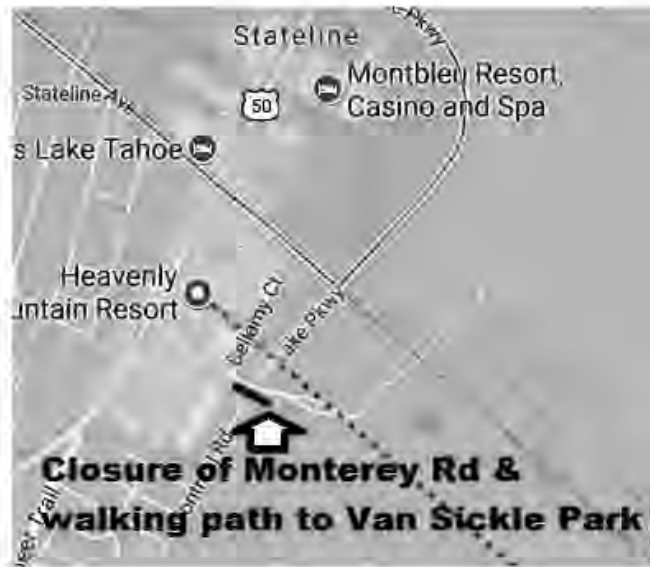
#### IMPROVE ACCESS TO VAN SICKLE BI-STATE PARK

There is no real need to change the access to Van Sickle Park unless the Loop Road is changed into Hwy 50. The closure of Monterey Rd. near the

41-8



Heavenly Village Parkway would provide an excellent opportunity to provide a ground level walkway/bikeway from the corner of Heavenly Village Parkway across a closed section of Monterey Rd. to the entrance of Van Sickle Park. This would also completely eliminate any need to build an expensive skyway across Lake Parkway as proposed.



41-8  
cont

## **SOCIAL & ECONOMIC ISSUES**

### **ENHANCE ECONOMIC OPPORTUNITY - FOR WHO?**

The TRPA needs to take their blinders off and recognize that people are just as much a part of the environment as bears, trees and the clarity of the lake. Numerous studies have shown that in more affluent areas the pollution is lower because the property owners have more discretionary funds to use for minimizing damage to the environment. Poor areas may even experience things like illegal dumping that pollutes our streams, lake and environment.

**Where is the "FINANCIAL IMPACT REPORT"?** Residents, taxpayers and employees are all part of the environment, but the report only addresses the needs of those people riding bicycles or walking on local pathways.

### **UNDERMINING WORKERS WAGES IS NOT BENEFICIAL TO THE ENVIRONMENT**

City Manager, Nancy Kerry is wrong in saying that the use of CEQA proceedings to examine the economic effects of the actions of the TRPA. Adverse economic effects can be devastating for the economy and consequently to the environment. Many of the

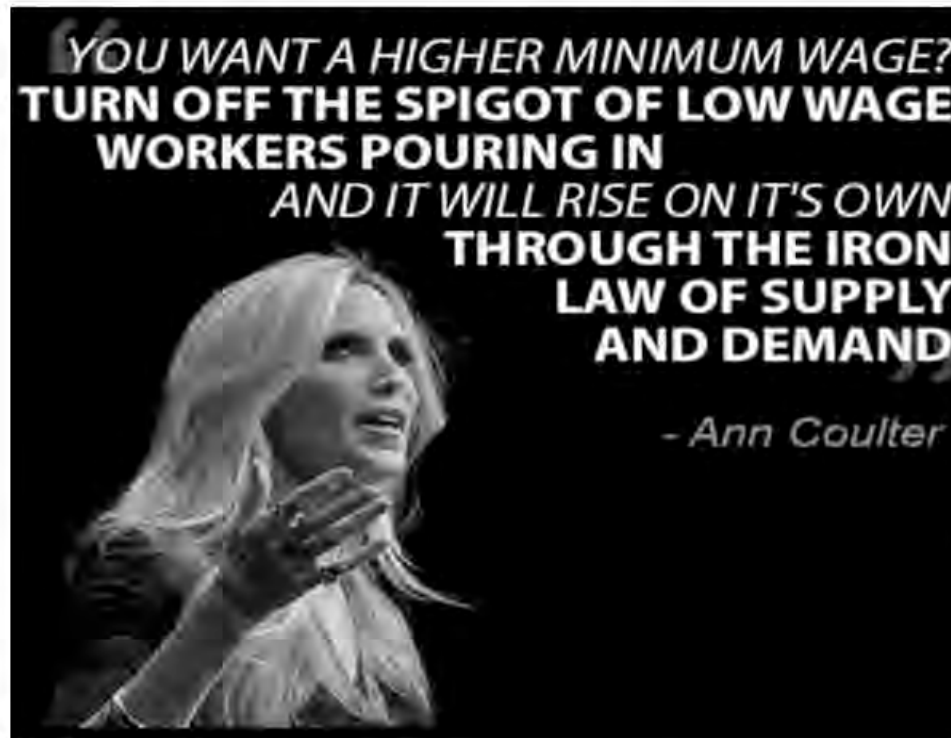
41-9

TRPA's recent decisions are undermining workers ability to obtain fair wages and should be examined in the enviromental studies.

**TRPA HAS ADOPTED AN ANTI-LABOR POLICY, MORE WORKERS = LESS WAGES**

The heavy snow last winter combined with the upturn in the economy has been beneficial to most unskilled labor around Tahoe. They are finally gettinhg reasonable wages in excess of the former minimum wage they recieved durring the recession.

The push to import over 1,000 new welfare recipiants into the workforce who will recieve an unfair advantage of being given subsidized housing in addition to other government financial assistance will make it impossible those who are currently paying market rate for their housing to compete and will undermine this uptrend in wages eventually forcing all laborers to recieve welfare and minimum wages in order to compete with them.



41-9  
cont

The 720 PLUS of additional welfare housing units will not lift the occupants up to better jobs, it will force all laborers to accept lower wages. The TRPA is creating a workforce that will become totally dependant on welfare. Combined they will double the number of welfare housing units in the area.

### STATE MANDATE TO INCREASE NUMBER OF HOUSING UNITS

This is a ridiculous pyramiding scheme. It is impossible for areas like Tahoe with limited available developable land to continuously increase the number of residential units forever. The idea that a city must provide accommodations for everyone who wishes to move there is impossible and could only be accomplished by forcing everyone to live in extremely small cubicles. When all available lots are developed it is time to quit building. The only way to add more units is to allow more condos/apartments per acre. This would certainly have a negative effect on the environment and the quality of life here.

### ADDRESS AFFORDABLE / WORKFORCE HOUSING NEEDS

Housing in the Tahoe area is very affordable. Houses here sell for around \$100,000 less than other areas. Small apartments are also lower cost and is the reason that so many unskilled/low wage workers have settled here.

It is disingenuous to claim that housing in the Tahoe area is not affordable in order to disguise the real purpose - building more welfare housing. South Lake Tahoe already has more welfare housing than is recommended by the state, yet the Tahoe Transportation Districts plans would increase it by 50%. Combined with the 430 units proposed for Zephyr Cove, it would more than DOUBLE the number of welfare units in the Stateline/South Lake Tahoe area.

Welfare housing will generate no property tax benefits for the local budgets while increasing demands for public services and raising taxes for all other property owners.

Douglas County is just dumping its welfare recipients on the Stateline & South Lake Tahoe area by constructing 420 units of welfare housing at Zephyr Cove and another 300+ units in connection with the Loop Road project using the excuse of providing affordable housing.

There is no evidence to support the claim that the workers will be employed in nearby casinos or business. They may be commuting for miles to their jobs.

The EIR fails to take into consideration the effect of adding over 1,000 additional cars to the traffic and roadways and pollution in the area.

The plan to build 300 plus welfare housing units along the Loop Road corridor is poorly thought out. The middle of casinos, bars and night clubs is not a good environment to raise 600 welfare children in.

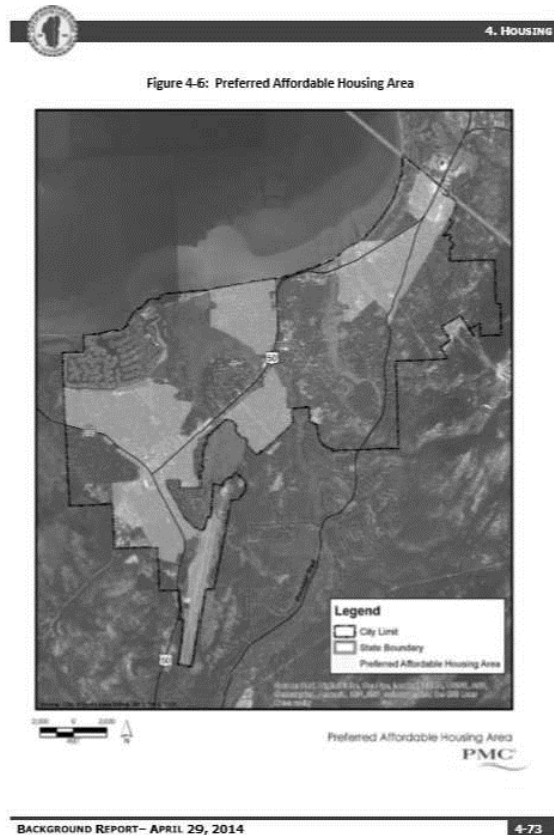
The proposed welfare housing will increase South Lake Tahoe school enrollment by at least 600 additional students without providing one cent of additional school funding to our already underfunded school system. This will force other property owners to compensate by paying higher property taxes or funding school bonds.

41-10

41-11

41-12

The plan engages in illegal "Red Lining" areas of the city where the welfare recipients will be dumped on current homeowners. The plan (Figure 4-6 Preferred Affordable Housing Area) will turn low income residential areas into outright slums and reduce existing home values.



41-13

Respectfully submitted July 6, 2017,

*John Messina*

**Letter  
41**

**John Messina**  
July 6, 2017

41-1

The commenter asserts that the proposal has many environmental problems that have not been discussed in the Draft EIR/EIS/EIS. It also states that TRPA is supposed to take input from all forms of public comment, yet the agency has not listened to the 2,852 voters that opposed the Loop Road Plan by supporting Measure T. The comment is general in nature and does not raise any specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. As described in Section 1.5, "Summary of Public Involvement," of the Draft EIR/EIS/EIS and this Final EIR/EIS/EIS, the environmental

review process for the project has included public scoping meetings, public engagement and outreach to the public, and a public review period for the Draft EIR/EIS/EIS. Public meetings and hearings have provided opportunities for people to provide feedback to the lead agencies on the project. Additionally, public comments on the Draft EIR/EIS/EIS are responded to in this Final EIR/EIS/EIS. The comment is noted for consideration by decision makers.

41-2

The commenter asserts that TRPA has engaged in preferential treatment by proposing a plan that would displace the homes of 50 to 60 lower income residents near Pioneer Trail and not eliminating the dangerous curve by cutting across an undeveloped portion of the Edgewood Estate from the beginning of the curve behind Montbleu. The commenter states that this safety issue was not discussed.

Table 3.6-4 and Impact 3.6-8 of the Draft EIR/EIS/EIS identify that the existing US 50/Lake Parkway intersection had accident rates higher than the state average accident rates for fatalities plus injuries, and total accidents, between 2010 and 2013. Roundabouts tend to reduce the severity of traffic accidents because the geometric design of the entry points eliminates right-angle collisions and high-entry speeds as well as reducing conflict points. Thus, implementation of the proposed roundabout for this intersection would reduce the severity of the traffic accidents occurring at this location, and in turn reduce the number of fatalities and injuries. This was found to be a beneficial outcome of Alternatives B and D.

The commenter's recommendation to realign Lake Parkway through the Edgewood mountainside property to a point near SR 207 does not recognize the benefits of the roundabout reported in the Draft EIR/EIS/EIS. The commenter's recommended roadway alignment would create unnecessary disturbance and private property acquisition, and would disturb and invoke additional Section 106 and 4(f) compliance documentation related to the Friday's Station complex, which was listed on the National Register of Historic Places (NRHP) in 1986. The comment is noted for consideration by decision makers.

41-3

The commenter states that it is obvious that Vail Properties, Heavenly Resort, and other casinos and commercial properties must have had some comment or opinion on the proposed project, yet none appears on the public record. The commenter also states that there was a lack of public input, and that meetings were poorly advertised and scarcely attended by members of the public, and that the meeting times were mostly between 8:00 a.m. and 9:30 a.m., which is inconvenient for low wage workers.

Section 1.5, "Summary of Public Involvement," of the Draft EIR/EIS/EIS describes public outreach efforts. Table 1-2 on page 1-11 shows that more than 150 meetings related to the project occurred between 2011 through 2016; these meetings included daytime and evening meetings with agencies, the public, and interested stakeholders.

Several comment letters received on the Draft EIR/EIS/EIS are from businesses referenced in this comment, including: Comment Letter 10 from the South Lake Tahoe Chamber of Commerce, Comment Letter 13 from the South Tahoe Chamber, and Commenter Letter 14 from the law offices of Feldman McLaughlin Thiel, representing the South Tahoe Alliance of Resorts (STAR). STAR includes the Lake Tahoe Resort Hotel, Heavenly Mountain Resort, Harrah's Lake Tahoe Hotel, Harvey's Lake Tahoe Hotel, Hard Rock Hotel Lake Tahoe, Montbleu Resort, Edgewood Companies, and Lakeside Inn.

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.

- 41-4 The commenter suggests constructing skywalks between Harvey's and Harrah's casinos and between Hard Rock Casino and Montbleu, similar to pedestrian overcrossings constructed in Reno. The commenter asserts this would eliminate the need to re-route US 50 around the casinos and increase floor space for commercial use in the casinos. The commenter expresses support for a skywalk, similar to Alternative E; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. It is unclear what the commenter is referencing to with regards to a mall. The project would narrow the existing US 50 through the resort-casino portion of the tourist core to one lane in each direction with complete street features to improve pedestrian bicyclist, and vehicle safety (see pages 2-14 and 2-15 of the Draft EIR/EIS/EIS). As stated on page 3.6-1 of the Draft EIR/EIS/EIS, "None of the build alternatives would install sharp curves or dangerous intersections, or result in incompatible uses." The comment is noted for consideration during the review of the merits of the alternatives.
- 41-5 The commenter asserts that the project would have devastating effects on small businesses in the study area that currently benefit from visitors seeing items in their windows as they drive by and encourage them to come in and shop. See Response to Comment 13-1.
- 41-6 The commenter notes that one underground walkway currently exists between Harvey's and Harrah's. The commenter asserts this is underutilized because both casinos have camouflaged it instead of making it clear for pedestrians that it is available. The commenter is correct in identifying this amenity that already exists for pedestrians within the resort-casino portion of the tourist core. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 41-7 The commenter asserts that the neighborhood cut-through traffic could be eliminated by closing Monterey Road between Heavenly Village Way and Fern Road noting that residents of nearby neighborhoods could access the shopping center via Pioneer Trail. It is assumed that the commenter is referring to Montreal Road, as Monterey Road does not exist within the study area. The commenter also notes that Lake Parkway would also still be accessible by using Heavenly Village Way. The commenter asserts that these solutions would eliminate the need to displace residents and reduce the costs associated with property acquisition. The Draft EIR/EIS/EIS included detailed analysis of an alternative that avoided displacement of businesses and residents (Alternative E). Additionally, as discussed in Response to Comment 66-2, a range of alternatives were developed during project planning that were ultimately dismissed from further discussion (see Table 2-5 and Appendix C of the Draft EIR/EIS/EIS). These alternatives also included alignment options that avoided or reduced impacts in the Rocky Point neighborhood. The comment does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 41-8 The commenter states that there is no need to change the access to Van Sickle Bi-State Park unless the Loop Road is changed into US 50 and closure of Monterey Road would provide an opportunity to provide ground-level access for pedestrians and bicyclists from Heavenly Village Way. The commenter asserts this would eliminate the need to build a pedestrian bridge across Lake Parkway. As stated on page 1-9 of the Draft EIR/EIS/EIS, one of the project objectives is to "improve connectivity, reliability, travel times, and operations of public transportation modes, including increased mobility and safety for bicycles and pedestrians and enhanced public access to Van Sickle Bi-State Park." Additionally, a new pedestrian bridge providing access to the park was developed in response to public comments received during scoping and concerns expressed by the California Tahoe Conservancy (Conservancy) and Nevada Division of State Parks (NDSP) regarding access to Van Sickle Bi-State Park resulting from the highway realignment (see Section 2.3.2, "Pedestrian Bridge over



Realigned US 50,” on pages 2-6 and 2-14 of the Draft EIR/EIS/EIS). Implementation of the build alternatives would also enhance access to Van Sickle Bi-State Park for pedestrians and bicyclists at the main entrance at Heavenly Village Way by constructing a signalized intersection. The comment does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.

- 41-9 The commenter expresses concern about the social and economic effects of the project in addition to effects on the environment. The commenter requests a financial impact report. The commenter asserts that economic effects can be devastating for the economy and the environment. The commenter makes assumptions about an increase in welfare recipients into the workforce and their receiving subsidized housing. The commenter asserts the project will double the number of welfare housing units in the area.
- Potential effects on residents and businesses, including displacement and environmental justice issues, are assessed in the EIR/EIS/EIS in Section 3.4, “Community Impacts,” Of the Draft EIR/EIS/EIS. Additionally, Section 4.6.2, “Economic Effects of the Project,” assesses short-term and long-term effects on businesses revenues in the study area as well as potential sales and property tax implications of implementing the project. The comment does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 41-10 The commenter expresses concern related to state requirements for constructing affordable housing in Tahoe. The commenter disagrees that housing in Tahoe is not affordable. The commenter asserts that South Lake Tahoe has more welfare housing than recommended by the state, that TTD plans would increase it by 50 percent, welfare housing does not generate property tax benefits, and there is no evidence to support the claim that workers will be employed in nearby casinos or businesses. Alternatives B, C, and D would construct an equal number of housing units as replacement for eligible residential units displaced by the project. TTD would replace all multi-family and single-family residential units that it acquires for road right-of-way purposes (see pages 2-5 through 2-6 of Chapter 2, “Proposed Project and Project Alternatives,” and Impact 3.4-4 on pages 3.4-42 through 3.4-50 of the Draft EIR/EIS/EIS). The replacement housing would include deed-restricted low-income and deed-restricted moderate-income housing to replace those low-income and moderate-income housing units that would be displaced by the project. The comment does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.
- 41-11 The commenter suggests that the Draft EIR/EIS/EIS does not take into consideration the effect of adding over 1,000 cars to roadways in the area. Regarding land use/traffic growth in the area, see the Responses to Comments 11-2 and 12-23.
- 41-12 The commenter asserts that the project would build housing in the middle of the casinos, bars, and night clubs, which is not a good environment for raising children. The commenter also asserts that the project’s housing would increase school enrollment by at least 600 additional students without providing any funding. See Response to Comment 58-3.
- 41-13 The commenter refers to Figure 4-6 in the City of South Lake Tahoe Housing Element Background Report and asserts that the plan engages in illegal “red lining” in the city where welfare recipients will be directed to housing turning low income residential areas into slums. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.

**Jessica Mitchell****Letter  
42**

**From:** Peter Miroyan <Petermiroyan@sbcglobal.net>  
**Sent:** Thursday, June 29, 2017 2:40 PM  
**To:** info@tahoetransportation.org  
**Subject:** Peter Miroyan US 50 Relocation (Loop Road) Project and EIR Report

To Tahoe Transportation District,

My name is Peter Miroyan, my family and another have owned and shared a cabin in Tahoe Meadows at South Lake Tahoe for over 50 years. Four generations have shared in the enjoyment of the Lake and its surroundings. We take great pride in being positive contributors to the society and ecosystem in this community.

This is the first time I've ever felt it necessary to voice our concerns to the Tahoe Transportation District, but I feel our safety and that of the other residents of our community are not being taken into account. Please understand that we have over many years, in all sorts of weather, at all times of the year and under every imaginable condition experienced driving in and out of Tahoe Meadows. As such, I strongly support maintaining the left in/out of Tahoe Meadows onto Highway 50 and keeping the Linear Park in its current and safe configuration.

If Russ Nygaard (or any other representative of your agency) feels it beneficial to discuss this in person with me, I would be more than happy to meet with him/them during the last week of July. Please ask him to contact me directly at 559-970-3848 and I will meet him at our gate to discuss this safety concern.

I appreciate your understanding and look forward to hearing from you.

Sincerely, Pete Miroyan

Sent from my iPad

42-1

**Letter  
42****Peter Miroyan**  
June 29, 2017

42-1

The commenter provides introductory information about the commenter's history in Tahoe and expresses strong support for maintaining the left-in/left-out turn lane at the entrance to Tahoe Meadows onto US 50 and keeping the Linear Park in its current configuration. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Letter  
43**

Thank you in advance for taking the time to read my comments. I tried to speak at the meeting last week but was too emotional to get the words out.

Firstly I do not believe we need the loop road to mitigate traffic problems along the Highway 50 casino corridor. We only have backups on 4-5 holiday weekends each year. I believe that in the 1000's of pages of documentation on the project CALTRAN concluded that the loop road project was not a long term traffic solution.

As my husband noted at one of the June meetings tourists want to drive by the casinos they want to see the lights and in most cases this is their destination. The traffic will persist west of the casinos and west of the Pioneer intersection along 50. The real solution is to put in additional tunnels under 50 in the casino and village corridor they work beautifully. I have seen comments indicating that we need to be able to shutdown 50 in the casino corridor or village area for special events well I challenge that, for these events shut down a portion of Heavenly Village Way or Stateline Ave or use the parking areas behind the Casinos like Harvey's does with their Summer Concert Series. Could even shut down the portion of Lake Pkwy behind Harrahs or Montebieu for events that stretch of road is beautiful

If I were to prioritize a traffic issues in town I would start with Pioneer as the speeds are too fast, there is a lack of shoulders and there are numerous side streets feeding onto Pioneer.

There is cut through traffic in our neighborhood, my neighbor on Chonokis has been most vocal about this but we all have the same problem to some extent and this should be addressed with speed mitigation tools such as speed cushions and speed humps. Make some money for the city with photo radar units

With Measure T being overturned in January it seems that we the people have no vote and the project will move forward regardless. Based on this these are my questions:

- Why is the Alternative 2 / Option D approved by CALTRAN in 2010, TRPA supported in 2012 and TTD's choice as recently as 2013 suddenly not the preferred option?
  - This alternative has the least impact on trees taken, housing taken and people displaced.
  - All along the preferred routing was to hug Ralley's and minimize the number of properties impacted.
- Who are the locals that constitute the group noted with alternative B as the "Locally preferred Option"?
- Why does a 5 lane road with adequate shoulders which generously would be ~80 feet wide need to destroy 3 full blocks or consume a ~660 feet wide swath of land?
- Why can't the people vote on this?
- Why weren't there flyers in every mailbox at least 4 times a year explaining to the residents what was going on and where to go for information?
- Why are we being referred to as the Rocky Point neighborhood we are Pinewood Park?

A roundabout at the Lake pkwy / 50 intersection should never be in any plan.

My neighborhood is no different than any neighborhood south of 50 between Ralley's and Sierra Tract. You can drive through all of these neighborhoods and see the same property conditions; great, good, ok, and deplorable. I would challenge the city to enforce code and require the property owners with deteriorating properties to maintain them or be fined repeatedly until the issued cited is fixed. There should be long term rental standards that need to be met in order to rent a property; GFI outlets, Fire/Co2 detectors, functional kitchens and bathrooms, occupancy limits, heat, etc. If the affected neighborhood is so offensive then to preserve the character of SLT there should be a grant program created to incentivize property owners to fix up their properties.

I do believe that the property in the neighborhood affected is prime real estate that developers can't wait to get their hands on. Our neighborhood is the same proximity/walking distance to Van Sickle, the lake, groceries, the Gondola, Heavenly Village and the casinos as the gated enclave "Gondola Vista Estates" now being built.

Bottom line is that we worked hard to fix up our homes on Moss Road and we don't want to lose them. Are they perfect are they done, no but we are kind of stuck until we know what is going to happen with this loop road project. We know what it will take to beautify our neighborhood and will happily support efforts to do so in order to save our homes and make the neighborhood a place the residents and city can be proud of.

Respectfully  
Patricia Murphy  
5721magic@gmail.com  
1038 Moss Rd

43-1

43-2

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43-6

**Letter  
43****Patricia Murphy**  
no date, 2017

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43-1

The commenter states that the US 50 casino corridor only received backups on 4 to 5 holiday weekends per year and that the project is not needed to mitigate traffic problems along the US 50 casino corridor. The commenter suggests that constructing additional tunnels in the casino corridor would help alleviate traffic concerns and portions of Heavenly Village Way, Stateline Avenue, Lake Parkway, and the parking areas behind the casinos could be closed off during special events. The commenter mentions traffic issues along Pioneer Trail such as high speeds, lack of shoulders, and numerous side streets connecting to Pioneer Trail. The commenter mentions mitigating cut-through traffic through the neighborhood along Chonokis Road by using speed cushions, speed humps, and photo radar units.

Corridor revitalization is recognized as one of the Transportation System Management Strategies outlined on page 3-32 of the 2017 RTP/SCS and the US 50/South Shore Revitalization Project is included on page 3-21, Figure 3-6: Short-Term (2017–2020) Active Transportation and Corridor Revitalization Projects of the 2017 RTP/SCS.

As shown in Table 3.6-22 of the Draft EIR/EIS/EIS, under Alternative A (No Build) Year 2040 Summer Peak conditions, the intersections of Pioneer Trail/US 50 and US 50/Stateline Avenue, and the roadway segment of US 50 between Pioneer Trail and Lake Parkway are projected to operate at unacceptable LOS per TRPA standards. Under Year 2040 Summer Peak conditions, all study intersections and study roadways segments are projected to operate at acceptable levels of service with Alternatives B, D, or E in place. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.

Alternatives that included construction of tunnels underneath US 50 have been considered but were eliminated from detailed evaluation in this Draft EIR/EIS/EIS as described on pages 2-47 and 2-48. These alternatives were eliminated from consideration because:

[they] would have an extremely high cost and challenging construction, which would require a specialized contractor, which deemed this alternative infeasible. Would require complex traffic handling/detours for multiple years. Constructability and cost impacts outweigh benefits.

The comment regarding tunnels is noted for consideration during the review of the merits of the alternatives.

Traffic issues along Pioneer Trail are outside of the study area and scope of the Draft EIR/EIS/EIS.

Increased speeds on US 50 are projected to reroute cut-through traffic, which is currently using local roads such as Chonokis Road and Montreal Road to avoid US 50 near the state line area, back onto mainline US 50, thus improving safety and reducing emissions on local roads in the study area. Installing features such as speed cushions and speed humps could result in safety improvements to the neighborhood, but they have limitations related to snow removal. Additionally, devices such as these, along with radar units, can help to reduce speeds, but would not reduce cut-through traffic. The comment is noted for consideration during project review.

43-2

The commenter expresses concern that with Measure T overturned the people have no vote and also questions why Alternative D, which was approved by Caltrans but is no longer the preferred alternative, in spite of having the least impact on trees, housing, and displaced people.

Alternative B is identified by TTD as the “locally preferred action” because, as stated on page S-6 of the Draft EIR/EIS/EIS, “TTD believes it best meets the objectives of the project and it emerged as the most supported alternative following public scoping.” In practice, FHWA does not identify a preferred action at the time of release of the draft environmental document, thus the Draft EIR/EIS/EIS recognizes the CEQA lead agency’s proposed project as the locally preferred action to distinguish that it is not yet a preferred action by the federal agency. As described on page 1-12 of the Draft EIR/EIS/EIS,

Following completion of the responses to comments and preparation of the final environmental document, TTD, FHWA, and TRPA will select a preferred alternative and make the final determination of the project’s effect on the environment. Public meetings will be held by TTD and TRPA as part of the process of selecting the preferred alternative and considering project approval.

Although Alternative B is identified as the locally preferred action (i.e., the proposed project for CEQA purposes) in the Draft EIR/EIS/EIS (see page 2-1 in Chapter 2, “Proposed Project and Project Alternatives,” of the Draft EIR/EIS/EIS), the lead agencies have the option to select any one of the alternatives as the alternative for project approval. This comment is noted for consideration by decision makers.

- 43-3      The commenter asks why the alternatives would need to occupy three full blocks or about 660 feet of land.

The Draft EIR/EIS/EIS assumes a reasonably foreseeable, conservative scenario for the amount of land needed for all alternatives so as to avoid understating the potential impacts that could occur related to the project. This includes assuming the largest roadway footprint that could possibly be required by Caltrans. The alternatives shown for US 50 in the Draft EIR/EIS/EIS meet Caltrans standard roadway design based on Caltrans Highway Design Manual (HDM). Designing to HDM standards for roadways results in an alignment that is at a skewed angle through the neighborhood area and is up to 125 feet wide. TTD would work with Caltrans to reduce the size of the roadway through a process known as a Design Exception. However, this process would not occur until after certification of the environmental document and a decision on the project. Because purchasing just the right-of-way needed for the roadway would leave small or unusable parcels remaining, those entire parcels would be purchased. This results in some areas where the right-of-way for the realigned highway is approximately 300 feet wide.

- 43-4      The commenter questions why people cannot vote on the project and why flyers were not mailed to residents at least four times each year. As noted in Section 1.5, “Summary of Public Involvement,” of the Draft EIR/EIS/EIS, TTD engaged in numerous public outreach activities in addition to the formal scoping process required by CEQA, TRPA, and NEPA. Public outreach included flyer distributions, press releases and media alerts, community events/stakeholder meetings, and community meetings (see page 1-11 of the Draft EIR/EIS/EIS). TTD utilized a Citizens Review Committee (CRC) and a Business Review Committee (BRC) during the scoping and early environmental phase to provide community input. TTD will continue to offer opportunities for public engagement throughout the environmental review and project design for the project.

- 43-5      The commenter states that a roundabout at the Lake Parkway/US 50 intersection should never be in any plan. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers.

- 43-6      The commenter describes housing conditions in the Rocky Point neighborhood as well as other neighborhoods in the South Shore area and supports any efforts that might be taken to

beautify the neighborhood to save their homes. The commenter also asserts that the neighborhood affected by the project is prime real estate for developers. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS. The comment is noted for consideration by decision makers.

Mary Nastronero, Architect Tahoe Meadows 3903 Cedar Avenue South Lake Tahoe California 96150

Letter  
44

Russ Nygaard  
TTD Program Manager  
PO Box 499  
Zephyr Cove, Nevada 89448

[Info@tahoetransportation.org](mailto:Info@tahoetransportation.org)

July 3, 2017

Dear Sir:

I am writing as a concerned resident of South Lake Tahoe and Tahoe Meadows. I have reviewed the proposals for the realignment of Highway 50 and while I support the overall intent of the efforts to reduce traffic in the Village, I have serious reservations about the impacts of the various alternatives on the single point of entry into Tahoe Meadows. All of the proposals have direct and very significant, detrimental impacts on the access to Tahoe Meadows, a community of over 100 properties.

Over the years, the original three points of access to Highway 50 into Tahoe Meadows have been reduced to a single point, with the other access points being limited to emergency vehicles. With the current proposals, this single point of access would be effectively restricted to right turns in and out under precarious conditions, an unacceptable situation. Further, there is a rise in the elevation of the existing Highway 50 to the east of the Tahoe Meadows entry, which limits the view of oncoming traffic, often coming at a high rate of speed. Under current traffic conditions, "gaps" in the traffic flow are created by the traffic controls at the existing intersection of Pioneer and Highway 50, which allow ingress and egress for Tahoe Meadows. Given the current proposals it appears that even these "gaps" will no longer occur.

What is needed for Tahoe Meadows residents to safely access their homes, is protected ingress and egress by means of a traffic signal activated on demand, to allow for the necessary turn movements. There is a similar control by means of a new traffic signal at Camp Richardson, which allows pedestrians to cross Highway 89 and cars to access the entry to Camp Richardson. Additionally, traffic control for the westbound traffic merging from the original alignment of Highway 50 onto to the realigned Highway 50, would further alleviate the conditions for the accessibility at the Tahoe Meadows entry.

There is a similarly detrimental impact of the various proposals on the greenway along Highway 50 with virtually no separation between the pedestrians and the traffic flow along highway 50. It is already an unpleasant experience walking next to the high-speed traffic, where the pathway comes closest to Highway 50. The proposed narrowing of the greenway and elimination of all of the greenspace buffer from the roadway, would create an unacceptable condition which would surely reduce the use of this walkway to nothing, from what is now a widely used, thoroughly enjoyed walkway.

It is my hope that working together, revisions can be made to the traffic plans that will create a realistic and workable entry conditions for the residents of Tahoe Meadows as well as improved conditions for the Village area.

Sincerely,



Mary Nastronero, Architect

44-1

44-2



**Letter  
44****Mary Mastronero**  
July 3, 2017

- 44-1 The commenter notes that while they support the overall intent of the project, they have concerns related to limiting access to right-in/right-out at the entrance to Tahoe Meadows. The commenter suggests installing a traffic signal activated on demand to allow for safe ingress and egress to Tahoe Meadows. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 44-2 The commenter asserts that the experience of walking along the Linear Park next to US 50 is already unpleasant and would be exacerbated through reducing the width of the Linear Park as part of the project. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell****Letter  
45**

**From:** Diane Nico <dnico@comcast.net>  
**Sent:** Wednesday, July 05, 2017 11:51 AM  
**To:** info@tahoetransportation.org  
**Subject:** Diane Nico-Comments AGAINST the proposed highway 50 project

## Concerns:

- 1: The linear parkway must stay in its current configuration to ensure safety of pedestrians, cyclists and cars.
- 2: Emergency vehicles must have access to the North gate of Tahoe Meadows.

45-1

45-2

Diane Nico  
 Summer resident of South Lake Tahoe since 1958

Sent from my tablet

**Letter  
45****Diane Nico**  
July 5, 2017

- 45-1 The commenter asserts that the Linear Park must stay in its current configuration to ensure safety of pedestrian, bicyclists, and vehicles. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 45-2 The commenter asserts that emergency vehicles must have access to the north gate of Tahoe Meadows. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell**Letter  
46

**From:** William Nico <wnico@comcast.net>  
**Sent:** Wednesday, July 05, 2017 1:13 PM  
**To:** info@tahoetransportation.org  
**Subject:** Wm Nico -Comments on the Highway 50 relocation project plan

Mr. Russ Nygaard, TTD Program Manager:

I have several serious concerns regarding the current project plans.  
 I'll enumerate them.

1. Lodge Road gate into Tahoe Meadows: It is extremely important to me that easy access to that gate be maintained to accommodate emergency vehicles (and occasionally other large vehicles, when necessary). This is an issue of public safety regarding our property at 3960 Cedar. I consider any plan that omits such access unacceptable.
2. Lodge Road pedestrian gate into Tahoe Meadows: This gate is extremely important to those of us who reside near it in Tahoe Meadows. Ordinarily residents at 3960 Cedar make one, and sometimes many more, trips through that gate for shopping at Raley's, Ace Hardware, etc. Blocking this access will force an increase in vehicular trips rather than a reduction to improve the environment.
3. Linear Parkway near Lake Road and Highway 50: Any design which narrows the Linear Parkway near the gate into Tahoe Meadows creates a safety hazard for the cars trying to enter, for those still proceeding along the road, and for bicyclers and pedestrians. It is quite common in peak season for vehicles to "stack up" at least two deep at the gate -- owners, renters/guests, or service vehicles. A narrower Linear Parkway will cause such vehicles to back up onto the highway impeding through traffic and causing a safety hazard. The lessened maneuverability space will also increase dangerous interactions between vehicles and bicyclist/pedestrians.

Also, to my mind narrowing the Linear Parkway would be something of a "breach of faith", since land for that Parkway was acquired from Tahoe Meadows owners by an eminent domain process.

I also think that any plans that forbid left turns at that intersection will likely add to congestion, rather than relieve it, because of the need to make u-turns nearby. Many cars entering Tahoe Meadows approach along east-bound Highway 50, while many leaving are also aiming to get onto east-bound Highway 50.

I hope your plans will be able to accommodate these concerns.

William R. Nico  
 Summer Resident 3960 Cedar Ave.  
 (Permanent mailing address 1826 Rosetree Ct., Pleasanton, CA 94566)

46-1

46-2

46-3

46-4

46-5

**Letter  
46**

**William Nico**  
July 5, 2017

- 46-1 The commenter expresses the importance of maintaining access for emergency vehicles at the Lodge Road gate into Tahoe Meadows. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 46-2 The commenter expresses the importance of maintaining access for residents to the pedestrian gate at Lodge Road. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 46-3 The commenter expresses concern that narrowing the Linear Park would result in safety hazards for vehicles, pedestrians, and bicyclists. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 46-4 The commenter also notes that narrowing the Linear Park would be a “breach of faith” since the land for the Linear Park was acquired from Tahoe Meadows owners by an eminent domain process. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration by decision makers. See also Master Response 2, “Effects on Access to the Tahoe Meadows Historic District.”
- 46-5 The commenter notes that not allowing left turns at the Tahoe Meadows entrance would increase congestion. See Master Response 2, “Effects on Access to the Tahoe Meadows Historic District.”

**Jessica Mitchell**

**Letter  
47**

**From:** STEPHEN PETTY <stephen.petty@sbcglobal.net>  
**Sent:** Tuesday, June 20, 2017 11:05 PM  
**To:** suggestions@us50revitalization.org  
**Subject:** Stephen Petty-current hiway 50 and Tahoe Meadows exit/entrance

Dear Sir and Ms.:

Removing a turn lane on hiway 50 at the Tahoe Meadows entrance/exit would add to the congestion problems on other streets when people can only make a right turn; many use Raley's as their main store and many a left turn is used. This would cause congestion as folks take a right turn and then a left turn at the first light, causing a back-up there and then feed into the neighborhoods trying to get back to where they want to go. Also, the left turn into Tahoe meadows, coming from the Y direction, allows drivers to wait to make the turn until the proceeding car is through the TM gate. Meanwhile, bicyclists and walkers are using the walkways bordering TM and drivers must be extra careful as they the exit/enter, and a back-up here would be dangerous. There needs to be a section at Tahoe Meadows for a middle turn lane both for SAFETY and TRAFFIC FLOW.

your, stephen petty  
3859 Beach Rd., Tahoe Meadows

P.S. This criticism is limited to the cause cited; I think you are doing a good job with the revamp.

47-1

47-2

**Letter  
47**

**Stephen Petty**  
June 20, 2017

- 47-1 The commenter asserts that removing the turn lane into Tahoe Meadows would add to congestion problems on other streets and the middle turn lane needs to be maintained for safety and traffic flow. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 47-2 The commenter notes that their criticism is limited to the cause cited. The commenter expresses support for the project. It does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration by decision makers.

**Jessica Mitchell**

**Letter  
48**

**From:** Michael L. Ross <mike@michaellouissross.com>  
**Sent:** Tuesday, June 13, 2017 4:23 PM  
**To:** info@tahoetransportation.org  
**Subject:** Michael Ross-Tahoe Meadows and Lake Road - VERY IMPORTANT

I am a long time homeowner in Tahoe Meadows. My address is 3961 Azure Road, South Lake Tahoe, CA. My family has owned homes in this neighborhood since 1954. Tahoe Meadows is a very special place, we are focused on being good citizens, and we are very environmentally conscious. Tahoe Meadows is on the national historic register because it was the first planned open space community in the Tahoe Basin. That means we preserve natural habitat within the neighborhood to keep Tahoe preserved as it should be.

48-1

It has recently come to my attention that the Tahoe Transportation District is considering eliminating the left in and left out from our neighborhood. My family has been making that left since before most (if not all of you) were even born. You can NOT eliminate that. Also, you are considering reducing the width of the linear park in front of Tahoe Meadows. That is very precious land. It was snatched from the neighborhood by the city through eminent domain 20 years ago, with all sorts of promises that it would be well maintained, landscaped and kept natural. We had to fight for 15 years to make the city come through with their promises on this front. And now you are talking about ripping it out. That's terrible!

48-2

Please, please, please don't do these two things. We can't have that happen. We can NOT ALLOW this to happen.

Also, please respond to my e-mail so I'm certain that you received it and have processed what I have said here.

Thank you,  
Mike Ross

-----  
Michael Ross  
Mike@michaellouissross.com  
650-387-5355

**Letter  
48**

**Michael Ross**  
June 13, 2017

- 48-1 The commenter notes they are a long-time homeowner in Tahoe Meadows and provides background information about the neighborhood. The commenter asserts that project cannot eliminate the left-in/left-out lane at the entrance to the neighborhood. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

- 48-2 The commenter expresses concern related to reducing the width of the Linear Park, which the commenter asserts the Linear Park was acquired from the neighborhood through eminent domain with promises for maintaining the land. The commenter requests that the left-in/left-out lane and Linear Park remain. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell**

**Letter  
49**

**From:** Shumate <theshumates@sbcglobal.net>  
**Sent:** Thursday, July 06, 2017 5:30 PM  
**To:** info@tahoetransportation.org  
**Subject:** Shumate-EIR Comment Letter

Brad Shumate  
 One Lodge Road  
 South Lake Tahoe, CA 96150  
 925-822-5029

July 6, 2017

Mr. Russ Nygaard  
 Transportation Capital Program Manager  
 TTD  
 P.O. Box 499  
 Zephyr Cove, NV 89448

Mr. Nygaard:

I am writing concerning the EIR as it relates to the alternative plans for the Highway 50 Revitalization project. As a resident that will be impacted by the new road alignment, I would like to state my concerns.

My property is located at 1 Lodge Road, South Lake Tahoe, and faces Highway 50. I enter my property from Lodge Road but per TRPA instructions and conditions of approval, the front of my house faces Highway 50 and is part of the "Scenic Resource Corridor". My property is in a scenic resource corridor and it was not mentioned in the EIR. This is a concern to me.

Lodge Road access was also not addressed in the EIR and questions regarding Lodge Road were submitted by the public in writing on comment cards during a 2016 community workshop. If Alternative B, C or D is approved, I am concerned about the negative impact on my view. The proposed building locations do not look like they meet the standards set forth in the "Regional Plan for the Lake Tahoe Basin" by the Tahoe Regional Planning Agency. I have a prescriptive right to the view - a view which was recognized at the time I built. This was evidenced by the building requirements and standards that TRPA required of our project. How would this be resolved?

I am also concerned about the impact Alternative B and C would have on the value of my property. Currently my property fronts highway 50. Replacing the highway directly in front of my home with a commercial building and affordable housing will impact the value of my property in a negative manner. If alternative B or C is approved my view of the Heavenly ski slopes will be replaced by a three story building, a parking lot and dumpsters.

I also have a concern regarding vehicular access to Highway 50 from my property. I currently have direct access to Highway 50 (Lake Tahoe Blvd) from Lodge Road and this access does not require an easement over any privately held property. With Alternatives B, C and D, access from Lodge Road may need to be granted through private property, and will no longer be direct. I have been advised that this is not legal. My guests and family use Lodge Road to access Highway 50 and do not want it turned into an emergency only access. The entrance at Lodge Road has been used for ingress and egress to Highway 50 for over 90 years.

Prior to Linear Park, our property adjoined Highway 50. When the conservancy acquired a portion of our lot for the Linear Park Project, I was promised landscape improvement, irrigation and maintenance along the parkway in front of my home. No landscaping or irrigation has been installed near me. Subsequently, I have maintained the portion of Linear Park that is adjacent to my home. There is also an open storm water outfall in Linear Park directly in front of my home which discharges highway storm water runoff onto my land and other Tahoe Meadow property. This problem was identified on my signed and approved site plan, however this issue has never been resolved. Why was this not mentioned in the EIR? I was never contacted during the EIR process. I could have asked questions and made comments during the process.

which would have added clarity for both you and myself. It appears my property and access are being ignored even though my home is greatly impacted by the proposed changes. How will these issues be handled by the Highway 50 Revitalization Project?

49-3  
cont

If alternative A, to do nothing, is the best for the environment, it is our wish that you would fight for that alternative. However, if that recommendation is going to be ignored we would like to recommend alternative D over alternatives B and C. Alternative B has the most negative environmental impacts. It cuts the most trees. It displaces the most residences and businesses. It will be the most costly when purchasing right-of-ways and relocating utilities. These are some, but not all the reasons that Alternative B should be the last alternative to be considered.

49-4

Respectfully Submitted,

Brad Shumate

**Letter  
49**

**Brad Shumate**  
July 6, 2017

49-1

The commenter states they are an owner of a residence in Tahoe Meadows that faces US 50 and they assert their property is in a scenic resource corridor and, along with Lodge Road access, was not mentioned in the EIR. The commenter describes the standards for building that TRPA required of building his project, is concerned about the negative impact of the project on their view, and is concerned that replacing the highway directly in front of their home with a commercial building and affordable housing would impact their view of the Heavenly ski slopes.

The Draft EIR/EIS/EIS recognizes the presence of three Roadway Travel Units and their respective Roadway Scenic Resources in the study area in the regulatory setting, affected environment, and analysis of environmental effects in Section 3.7, "Visual Resources/Aesthetics." The Draft EIR/EIS/EIS shows existing conditions and proposed transportation-related changes in Roadway Travel Unit #33, The Strip, that extends along US 50 west of Pioneer Trail (including the portion of US 50 adjacent to Tahoe Meadows) in Exhibit 3.7-11 on page 3.7-25, Exhibit 3.7-14 on page 3.7-32, and Exhibit 3.7-16 on page 3.7-35. Improvements in visual conditions in Roadway Travel Unit #33 from Alternative B transportation improvements would occur because, as stated on page 3.7-27:

Streetscape improvements and the reduced width of the roadway would improve visual quality while the urban visual character of the corridor would be maintained. The area would become a more attractive and inviting place. Compared to the existing roadway environment, the level of visual unity would increase.

Alternatives C and D transportation improvements would have similar beneficial effects on visual conditions in Roadway Travel Unit #33 as described for Alternative B (see pages 3.7-34 and 3.7-38).

Potential effects from implementation of the mixed-use development, or construction of replacement housing at one of the mixed-use development sites, are assessed on page 3.7-29 and 3.7-30 of the Draft EIR/EIS/EIS and determined to have a less-than-significant impact on scenic quality and visual character because:

New development would need to comply with all applicable design standards and guidelines, including height standards, and would need to be oriented and designed in ways that avoid impacts to TRPA scenic threshold ratings for travel routes and



scenic resources. The mixed-use development projects would have to undergo project-level environmental review once they are defined and submitted for permitting. Under these conditions, it is assumed that new mixed-use development on Sites 1, 2, and 3 would have few additional impacts beyond those described for the transportation improvements on scenic quality and visual character.

Alternatives C and D mixed-use development would be subject to similar design standards and guidelines to avoid impacts to TRPA scenic threshold ratings for travel routes and scenic resources as described for Alternative B mixed-use development (see pages 3.7-34 and 3.7-38).

Simply because an area contains a TRPA Roadway Travel Unit or Roadway Scenic Resource does not necessarily preclude the ability of a project to make transportation improvements or construct new commercial or residential development. As described above, new development would be subject to TRPA design standards and guidelines, including height standards, to avoid impacting scenic resources. Furthermore, views from private property are not specifically protected, beyond those protections that might be secondary benefits of implementing the TRPA design standards, guidelines, and height restrictions in new developments.

The commenter's concern related to adverse effects on the value of his property does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.

- 49-2 The commenter expresses concern that access to his property from Lodge Road will be maintained for emergency access only. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District," related to concerns about maintaining the use of Lodge Road. The project has no plans to change the use of Lodge Road.
- 49-3 The commenter expresses concern related to landscaping and irrigation of the Linear Park, a portion of which the commenter asserts were acquired from him, and also expresses concern related to stormwater discharge from the highway onto his property and other Tahoe Meadows property. The commenter questions why the Draft EIR/EIS/EIS did not address this issue and how the US 50 project will handle this issue. It is unclear to what extent the drainage and landscape issues are within the project footprint. Drainage improvements would be made as part of the project within the project site. If there are any temporary effects on existing landscape within the project site, those areas would be replanted as necessary.
- 49-4 The commenter expresses support for Alternatives A and D as opposed to Alternative B, which the commenter asserts would have the most negative environmental impacts. It does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during the review of the merits of the alternatives.

**Jessica Mitchell**

Letter  
50

**From:** Shumate <theshumates@sbcglobal.net>  
**Sent:** Friday, July 07, 2017 3:19 PM  
**To:** info@tahoetransportation.org  
**Subject:** Brad Shumate EIR Comments

Brad Shumate  
One Lodge Road  
South Lake Tahoe, CA 96150  
925-822-5029

July 7, 2017

Russ Nygaard  
Transportation Capital Program Manager  
TTD  
P.O. Box 499  
Zephyr Cove, NV 89448

Mr. Nygaard,  
Thank you for taking my comments. I sent comments yesterday but I have two more concerns.

I am interested in finding out if the Highway 50 Revitalization Project has plans for the gas main that runs under Linear Park between Highway 50 and Tahoe Meadows. I did not see where this was addressed in the EIR. In approximately the 3900 block of Highway 50, there is a "Natural Gas Pressure Regulating Station". It is extremely noisy and potentially a safety hazard. If a vehicle ran off the road and collided with this station it would be a disaster. Are there plans to have this relocated? This should be relocated away from a residential area.

50-1

The transit/bus stop that is located on the west side of Highway 50, at the corner of Lodge Road and Highway 50 needs to be relocated. There is no bus pull out, so buses must stop to load and unload passengers while impeding traffic. This is a safety issue. People that use the bus stop leave graffiti and trash. They also throw trash into my yard and urinate through the fence. They have even climbed over the fence. Please relocate this bus stop to an area where there is more exposure to the public so that the users will be less likely to vandalize the bus stop enclosure.

50-2

Thank you for reviewing these issues.

Brad Shumate

**Letter  
50**

**Brad Shumate**  
July 7, 2017

---

- 50-1 The commenter questions what the project's plans are for the gas mains that run under the Linear Park, notes they did not see where the Draft EIR/EIS/EIS addressed this issue, and suggests the natural gas pressure regulating station be relocated away from a residential area. The project's potential conflicts with utilities, including natural gas infrastructure, are addressed in Impact 3.5-1 on pages 3.5-11 through 3.5-16 of the Draft EIR/EIS/EIS. As described on pages 3.5-42 and 3.5-43, the transportation improvements and mixed-use development would be required to implement Mitigation Measure 3.5-1 that would reduce any potential conflicts with utility services and utility infrastructure "because TTD would coordinate with affected utility companies, engineering studies, and environmental analyses to ensure that all utility realignment and/or relocation plans are feasible and compliant with federal, state, and local regulations." The need to relocate the natural gas pressure regulating station next to the Linear Park would be determined, through coordination with Southwest Gas Corporation, after the preferred alternative is chosen and more complete design plans for the project are completed.
- 50-2 The commenter requests that the bus stop at the corner of Lodge Road and US 50 be relocated because since there is no bus pull out, the bus must stop in traffic, which impedes traffic flow and causes a safety hazard. The commenter also asserts that people using the bus stop leave graffiti and trash and even leave trash in his yard and climb over the fence. As described on page 3.6-58 under Impact 3.6-6, with implementation of Alternative B transportation improvements:
- Transit operations would be improved as a result of wider shoulders and the potential provision of bus pullouts, resulting in safer bus stop operations. The decreased traffic volumes through the tourist core anticipated under Alternative B would enhance safety and improve transit service by reducing travel times and delays associated with congestion in the area. Alternative B would also include the construction of new bus shelters at bus stop locations where existing features are limited to signs and, in some cases, benches.
- Alternatives C and D would also construct these transit improvements (see pages 3.6-59 – 3.6-61). Thus, the project would result in improvements that would address the commenter's safety concerns about buses needing a pull-out area that would take them out of the travel lane. The bus stops in the study area are equipped with bear-resistant trash and recycle cans. Concerns related to graffiti and trash are outside of the scope of the project, such that the types of improvements included in the project do not have control over the choices of individuals to cause these nuisance problems.

**Jessica Mitchell****Letter  
51**

**From:** Megan Siler <mhsflick@comcast.net>  
**Sent:** Tuesday, June 13, 2017 1:03 PM  
**To:** info@tahoetransportation.org  
**Subject:** Megan Siler Re: Loop road safety and traffic concerns @ hwy 50/Lake rd.

Dear Tahoe Transportation District,

I am a resident of Tahoe Meadows and I am writing to say how absolutely important it is that:

- the new loop road plan(s) maintain the left in/out of Tahoe Meadows and that
- The plan should also keep the linear park in its current configuration at highway 50/Lake road (instead of reducing its width which is proposed in plans B,C,D).

Having to only turn right and then having to do a 'U' turn at Wildwood in order to go back towards Stateline will create a continual backup on highway 50 and increase the likelihood of collisions due to stopped traffic in the road.

Also if the the linear park area is reduced then exiting and entering cars to Tahoe Meadows will block the bike path and could also back up into traffic flowing along highway 50.

Tahoe Meadows has expressed these concerns previously over the course of five years and it looks like none of the B,C,D alternative plans consider these safety and traffic issues.

**I strongly support a plan that will maintain the left turn in/out of Tahoe Meadows, as well as maintaining the current width of the linear park at highway 50/Lake Road.**

Sincerely,

Megan Siler  
 Homeowner – Tahoe Meadows Association

51-1

**Letter  
51**

**Megan Siler**  
 June 13, 2017

51-1

The commenter asserts that it is important the project maintains the left-in/left-out lane at the entrance to Tahoe Meadows and that the Linear Park should remain in its current configuration to avoid congestion and safety issues. The commenter notes Tahoe Meadows has expressed these concerns and none of the alternatives consider these issues. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell****Letter  
52**

**From:** Craig Southwick <c.southwick@comcast.net>  
**Sent:** Friday, June 23, 2017 9:10 AM  
**To:** info@tahoetransportation.org  
**Subject:** Craig Southwick - Concern over accessing my property

I have recently been made aware that during the planning and design process for the bypass loop road for Highway 50, the access road to my property in Tahoe Meadows, South Lake Tahoe, was not considered nor recognized. This concerns me. Not being able to turn left onto Lake Road from Highway 50 will create a lot of problems. Not being able to turn left onto Highway 50 will create more traffic as I will have to turn right, make a U-Turn at the light at Wildwood or turn left. Either option stops traffic needlessly, backing up east bound travel. I am also concerned that emergency vehicles will have to go around the block and additional intersections to reach the entrance to Tahoe Meadows instead of turning left directly off of the highway. If my loved ones need help, I do not to wait any longer than is necessary as you can understand.

52-1

52-2

PLEASE reconsider your designs and include Lake Road and the entrance to our community in them. As a long standing member of South Lake Tahoe, we need to included in the whole picture.

Thank You,  
 Craig Southwick  
 3949 Cedar Road  
 South Lake Tahoe

Sent from [Mail](#) for Windows 10

**Letter  
52****Craig Southwick  
June 23, 2017**

- 52-1 The commenter expresses concern that removing the left turn into Tahoe Meadows would create traffic problems. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 52-2 The commenter expresses concern that emergency vehicles would be required to go around the block and through additional intersections to reach the entrance to Tahoe Meadows instead of being able to turn left directly from the highway, increasing emergency response times. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell**

**Letter  
53**

**From:** Susan Steinhauser <susanst2@bzzmail.com>  
**Sent:** Thursday, July 06, 2017 9:03 AM  
**To:** info@tahoetransportation.org  
**Cc:** dan@danielbengreenberg.com  
**Subject:** Susan Steinhauser Proposed Changes to South Lake Tahoe Loop Road: Impact on Tahoe Meadows

To Whom It May Concern:

We've been Tahoe property owners since the 70s and happily so. It is paradise. Please help keep it that way by keeping the entry and exit to Tahoe Meadows easy and safe, not only for us residents, owners and visitors but also for emergency service providers. In other words, please maintain the left in/left out of Tahoe Meadows and keep the Linear Park in its current safety figuration. We would be so very appreciative.

53-1

Susan Steinhauser and Daniel Greenberg  
 3975 Beach Rd.  
 South Lake Tahoe California

Sent from my iPhone

**Letter  
53**      **Susan Steinhauser and Daniel Greenberg**  
 July 6, 2017

53-1      The commenter provides introductory information about the commenter's history in Tahoe and asks that the left-in/left-out lane at the entrance to Tahoe Meadows in addition to the current configuration of the Linear Park be maintained. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."



**Jessica Mitchell**Letter  
54

**From:** john@scountyrealty.com  
**Sent:** Monday, June 26, 2017 2:56 PM  
**To:** info@tahoetransportation.org  
**Subject:** John Telfer Loop Road EIR and impact on Tahoe Meadows.

Mr. Russ Nygaard, As a long time owner of a residence within the historic Tahoe Meadows neighborhood I wanted to voice my deep concern regarding the Loop Road EIR inadequacies pertaining to the study of impacts of either option B, C, or D of the EIR upon said neighborhood. I have been a real estate broker for over 40 years in the bay area and deal quite often with EIR reports pertaining to development of the numerous commercial and residential projects we are directly involved with, including the largest Ford Auto Dealership in Northern California. Having these experiences I must say I am left quite puzzled at the lack of adequate (or should I say the lack of ANY) analysis of these three option's and their potential impacts upon Tahoe Meadows. There are clearly multiple issues that will take place should any of these 3 options become reality, such as:

54-1

#### **1. Impacts of Changing Tahoe Meadows Access at Hwy 50/Lake Road**

requiring *all* vehicles entering Tahoe Meadows to make a 'right in' turn will create a back-up on Hwy 50 while vehicles wait for the cars ahead of them to use the keypad to open the TM gate. This creates a significant safety hazard for rear-end collisions due to stopped vehicles on Hwy 50. The situation is made much worse by drastically narrowing the Linear Park at Lake Road.

#### **2. Reduction of the Width of the Linear Park at Hwy 50/Lake Road**

EIR Alternatives B, C and D redesign the Linear Park to drastically reduce the width of the park to accommodate widening of Hwy 50 at Lake Road. It would be to 14 feet from fence to curb. Trucks and vehicles with trailers entering Tahoe Meadows will block the bike path while using the gate keypad. All vehicles exiting Tahoe Meadows will block the bike path while waiting for a break in oncoming traffic. If a vehicle is stopped at the keypad, additional cars entering Tahoe Meadows will have to stop on Hwy 50 or block the bike path to wait for the vehicle ahead to clear the gate. This adds to the safety hazard for rear-end collisions on Hwy 50 and creates problems for bikes & pedestrians on the path. Also FYI when the Linear Park right of way was negotiated with those members of Tahoe Meadows who front Hwy 50 it was represented to them by the city RDA and others that the substantial cushion derived from said linear park was a real positive for traffic noise and lighting issues. Now we hear that was then this is now, too bad homeowner. No wonder trust in Government is at an all time low.

54-2

#### **3. Combined Changes: No Left In/Left Out Plus Narrowing the Linear Park**

Combining the changes dramatically intensifies the danger.

#### **4. Emergency Vehicle Access to Tahoe Meadows at Hwy 50/Lodge Road**

The EIR Alternatives B, C and D fail to provide uninterrupted emergency vehicle access at Hwy 50/Lodge Road. Tahoe Meadows has extremely limited access for emergency vehicles and for fire evacuation: the gate at Lake Road and two Emergency Vehicle Access gates at Wildwood Ave. and Lodge Road.

54-3

Lastly, please remember that Tahoe Meadows is a registered Historically Significant Planned Development Community and negative impacts such as those described above are therefore even more concerning. I would like to respectfully request that the EIR needs to be amended to include the required and necessary analysis pertaining to these impacts, or seek other options that do not place these burdens unduly upon this wonderful community.

54-3  
cont

Respectfully, John Telfer and Family



Letter  
54

John Telfer  
June 26, 2017

- 54-1 The commenter provides introductory information about the commenter's history in Tahoe and asks that the left-in/left-out turns to and from Tahoe Meadows to US 50 in addition to the current configuration of the Linear Park be maintained. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 54-2 The commenter asserts the changes to the roadway and Linear Park at the entrance to Tahoe Meadows would result in safety hazards for vehicles, pedestrians, and bicyclists. The commenter also notes the separation between Tahoe Meadows and US 50 provided by the park would provide positive benefits for traffic noise and lighting issues. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District." With respect to the comment about the positive benefits of the Linear Park, the comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.
- 54-3 The commenter asserts that Alternatives B, C, and D do not provide uninterrupted emergency vehicle access at the intersection of US 50 and Lodge Road and that, in general, the negative impacts on Tahoe Meadows are more concerning given that Tahoe Meadows is a registered Historically Significant Planned Development Community. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

<p>Letter 55</p>
----------------------

Gerald H. Trautman, Jr.  
Susan Shinkle Trautman  
3762 Meadow Road  
So. Lake Tahoe, CA 96150  
Mailing address:  
PO Box 66  
Rio Linda, CA 95673  
916 284 3532

RECEIVED  
JUL 05 2017

July 1, 2017

Mr. Russ Nygaard  
TTD Program Manager  
PO Box 499  
Zephyr Cove, NV 89448

Re: Elimination of Left Turn Pocket  
at Tahoe Meadows (TM) in  
"Alternatives B, C, and D.

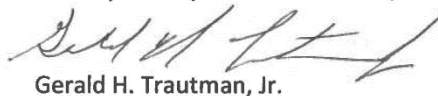
We own a home in TM. TM is a one-hundred-acre private gated community with approximately 100 homes, primarily vacation homes. During the summer months, there can be up to 300 cars within TM and on the Fourth of July, that number can swell to close to 500 cars. These cars need to come and go into TM during the same summer months that Highway 50 carries the heaviest traffic. Further, the majority of the cars entering TM are traveling from the south toward the north, from the direction of Bay Area population centers and South Tahoe commercial areas, and therefore use the left turn pocket to enter TM.

The elimination of the left turn pocket into TM will create two negative traffic situations. First, by eliminating the left turn pocket it will route several hundred cars further north into the very busy intersection at Pioneer Trail and Highway 50 where it will be necessary for them to make U-turns to return to the TM entrance. This can only create more congestion. Secondly, because TM is a gated community, there are times when cars may back up as they attempt to get the gate open. The left turn pocket as it is presently constructed provides an excellent buffer so that cars do not back up into moving traffic. The elimination of the left turn pocket will create a dangerous traffic situation as cars wait to get into TM. We understand that the proposed plan will narrow the Linear Park in front of TM which will only exacerbate this problem.

55-1

We urge you to leave left turn pocket and the Linear Park as they are currently configured.

Thank you for your consideration,



Gerald H. Trautman, Jr.



Susan Shinkle Trautman

**Letter 55**      **Gerald Trautman, Jr. and Susan Trautman**  
July 1, 2017

- 55-1      The commenter provides information about the traffic numbers and patterns of visitors to Tahoe Meadows and asserts the elimination of the left-turn pocket into the neighborhood would result in congestion from vehicles making U-turns at the US 50/Pioneer Trail intersection and would create a dangerous traffic situation for cars trying to access Tahoe Meadows. The commenter also asserts that narrowing the Linear Park in front of Tahoe Meadows would exacerbate these problems. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

**Jessica Mitchell**

**Letter 56**

**From:** Diane Williams <dkw55@comcast.net>  
**Sent:** Wednesday, June 14, 2017 3:52 PM  
**To:** info@tahoetransportation.org  
**Subject:** Diane Williams Loop Road Project

To Whom it May Concern,

As a homeowner in Tahoe Meadows, I have serious concerns about the changes proposed with the new loop road.

I believe maintaining the current left in/out from/to highway 50 from Tahoe Meadows is very important, and that changes to the current linear park configuration would be dangerous to walkers, bikers, and motorists alike.

Please take my thoughts under consideration.

Thank you,

Diane Williams

56-1

**Letter 56**      **Diane Williams**  
June 14, 2017

- 56-1      The commenter states that maintaining the left-in/left-out turn lane at the entrance to Tahoe Meadows and keeping the Linear Park in its current configuration are very important. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”

## Public Hearings

Public Hearing		US 50/South Shore Community Revitalization Project		Page	
				Letter 57	
1					
2	PUBLIC HEARING FOR THE				
3	US50/SOUTH SHORE COMMUNITY REVITALIZATION PROJECT				
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11					
12					
13	PUBLIC COMMENTS				
14	FRIDAY, JUNE 9, 2017				
15	Stateline, Nevada				
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21					
22					
23					
24					
25	REPORTED BY: Janet Menges, CCR #206 (NV) CCR #5785 (CA)				
Bonanza Reporting & Videoconference Center		(775) 786-7655		1111 Forest Street Reno, NV 89509	

1	
2	APPEARANCES:
3	STEVE TESHARA, CHAIRMAN
4	CARL HASTY
5	JUDI ALLEN
6	MARSHA BERKBIGLER
7	AUSTIN SASS
8	SUE NOVASEL
9	SANDRA ROSENBERG
10	ARTHUR MURRAY
11	MARK KIMBROUGH
12	WILL GARNER
13	RON TREABESS
14	ADAM SPEAR
15	NANCY McDERMID
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Public Hearing

US 50/South Shore Community Revitalization Project

Page 3

1 STATELINE, NEVADA, FRIDAY, JUNE 9, 2017, 9:30 A.M.

2 -oOo-

3

4 MR. TESHARA: Anyone else?

5 Okay, seeing none, thank you, Nannette,  
6 and I move to the public hearing.

7 Again if I have your name on the list I  
8 will go down this list, and if you are speaking on  
9 behalf of yourself you would have three minutes and  
10 if you're speaking on behalf of an organization or an  
11 agency you would have five minutes.

12 Mr. Yank, please identify yourself and  
13 give your affiliation.

14 MR. YANK: I will.

15 My name is Ron Yank and I am the  
16 president of the Tahoe Meadows Association. Ms.  
17 Allen, Judi Allen has been kind enough to run off  
18 copies of a two page letter from our law firm and a  
19 four page attachment which goes into some detail  
20 about our objections with regard to safety, which is  
21 of course an important part of an Environmental  
22 Impact Report.

23 With me are members of the Tahoe Meadows  
24 community, if you would just all stand up and raise a  
25 hand or something. Thank you, and maybe some of them

57-1

57-2

Bonanza Reporting &amp; Videoconference Center

(775) 786-7655

1111 Forest Street Reno, NV 89509

1 will speak later.

2           So our community is about a hundred years  
3 old. We try to be good neighbors. Indeed we sold  
4 part of our land to the city to build the Linear  
5 Park. What is very interesting about the  
6 environmental report is it literally does not mention  
7 the intersection between Highway 50 and Lake Road.  
8 Going through that intersection in a three month  
9 period 18,000 vehicles go in, 18,000 go out. We have  
10 a keypad on our gate connected to a computer, et  
11 cetera, et cetera, et cetera. If anything that  
12 number is low, 36,000 total in and out, because  
13 during the summer months sometimes two, three  
14 vehicles go in on one gate opening.

15           We have attended every single meeting  
16 this agency has held starting with the end of 2011.  
17 We have constantly made it clear that the ability to  
18 turn left into Tahoe Meadows and to turn left going  
19 out is of paramount importance to us. That's because  
20 of what I will call the two two middle configuration  
21 on 50.

22           What the project presently does is it  
23 wipes out two two middle about a hundred yards west  
24 of the intersection of Lake and Highway 50. What  
25 that means is if anyone wants to get into Tahoe

57-2  
cont

1 Meadows coming from Ski Run Boulevard they are going  
 2 to have to go by and somehow make a U-turn. If  
 3 anyone wants to go to Raley's or to the movies from  
 4 Tahoe Meadows they are going to make a right-hand  
 5 turn on your plan, find a place to make a U-turn, et  
 6 cetera.

57-2  
cont

7           What we are asking is to slide the end of  
 8 two two middle about a 150 yards east. That would be  
 9 maybe 40 to 50 yards east of the intersection of  
 10 Lake. I don't want to get too much into the reeds,  
 11 but it would roughly be where Midway presently hits  
 12 Highway 50. That would enable people to make a left  
 13 out and at Midway that left out ends and becomes part  
 14 of your left-hand turn onto the new city street, and  
 15 95, 99 percent of our people would just get into that  
 16 protected left out and then keep going as it turns  
 17 into a left turn only. You have two left turn only  
 18 lanes from existing 50 onto the city street. We  
 19 think this is an easy, doable fix.

57-3

20           In that regard I want to cite an e-mail  
 21 from your prior projects manager. So if you go four  
 22 pages into this document you have been handed, which  
 23 is page 2 of our initial written objections, right in  
 24 the middle you will see highlighted in a  
 25 December 2014 e-mail from prior projects manager

1 Alfred Knots, I wanted to let you know I did  
2 follow-up with our design engineer and he has assured  
3 me that we can get a two-way left in front of Tahoe  
4 Meadows so that it will essentially mimic what is  
5 occurring today. So we think we have an easy fix.

57-3  
cont

6 We think your planners have let you down.  
7 Our attorney will follow-up, maybe making nasty  
8 noises on the law.

9 MR. TESHARA: Not Mr. Johnson.

10 MR. YANK: Our organization is super  
11 angry and that's because of our involvement and your  
12 report literally does not mention the intersection  
13 with -- and the impact of 50 and Lake Road. We did a  
14 computer word search, a thousand pages in the report,  
15 500 pages in the appendix, you don't mention that.

16 Now, the bad news for us is you did not  
17 accommodate us. The good news for us is you are now  
18 at grave legal risk. Let me get away from the legal  
19 noises and just speak to you as people.

57-4

20 This existing configuration is going to  
21 kill or maim people. How is that? There's three  
22 groups of people I have in mind here.

23 First, our emergency responders, police  
24 and fire. A fire emergency in Tahoe Meadows, fire  
25 trucks want to get in. They are going to be sitting

1 in the left-hand lane of an active highway with the  
2 only thing to protect them flashing red lights, ditto  
3 the police. Now, those folks at least have flashing  
4 red lights.

5 Then you've got civilians wanting to come  
6 into Tahoe Meadows. Go onto Map Quest. I did it  
7 last week. Map Quest will tell you if you're coming  
8 up from Sacramento, the Bay Area, whatever, stay on  
9 50, come through the Y, get on to Lake Tahoe  
10 Boulevard and turn left right onto Lake Road to get  
11 into Tahoe Meadows. I just had to go buy a new  
12 Toyota corporation vehicle, our old one got totaled,  
13 and so coming up here a couple of weeks ago I had my  
14 little GPS, Jennifer we call her, tell me how to go.  
15 Stay on 50 right through the Y, turn left into Tahoe  
16 Meadows. So you're going to have civilians confused  
17 as all get out. Either they will try and illegally  
18 cross three lanes of a highway with no protection,  
19 because they can get rear ended or God knows what.

20 Last thing, you, by you I mean your  
21 planners have added an additional lane. I think it's  
22 kind of a no stop lane coming from the street. There  
23 will be no light stopping it making the curve onto  
24 the old 50. To accomplish that you have shrunk the  
25 park, the Linear Park. It's going to be so shrunk

57-4  
cont

1 that there will be room for just one car at our gate  
2 and then a slimmed down bike trail and practically no  
3 foliage. Now, why the heck is that dangerous and  
4 this may be the most dangerous aspect of all. Right  
5 now at the entrance of Tahoe Meadows there's room for  
6 one car at the gate, at the keypad and sometimes it  
7 takes people two or three times to get in, even my  
8 children, then you have a nice wide bike lane and  
9 then there's additional space. So if you've got two  
10 cars stacked up, which is so terribly common in the  
11 summer, that will be wiped out. There will be barely  
12 room for one car.

13           You've got our garbage trucks coming in.  
14 That garbage truck is going to be sticking out into  
15 the right-hand lane of the highway. You're forcing  
16 all cars who want to come into Tahoe Meadows to  
17 somehow circle around to the east and make a  
18 right-hand turn. So there's people at the keypad and  
19 you're going to have car two, three, gosh knows what  
20 sticking out in the middle of an active highway, and  
21 all you have to do -- that right-hand lane merges  
22 into the existing two two middle again just about a  
23 hundred yards west of Lake Road.

24           MR. TESHARA: Mr. Yank, if you could --

25           MR. YANK: I'm here.

57-4  
cont



Public Hearing

US 50/South Shore Community Revitalization Project

Page 9

1 MR. TESHARA: You've had about ten  
2 minutes is what you have had.

3 MR. YANK: Our ask is let us meet with  
4 your planning staff so that we can circle back to  
5 that 2014 e-mail and work something out. We are not  
6 opposed to this project, but we're worried about  
7 obviously our own convenience and literally lives.

8 Thank you all.

9 MR. TESHARA: Thank you, sir.

10 Mr. Johnson.

11 MR. JOHNSON: Thank you.

12 Mike Johnson from the law firm of  
13 Rollston, Henderson, Crabb and Johnson, and as  
14 Mr. Yank points out I'm here representing Tahoe  
15 Meadows Homeowners Association today.

16 I have only recently become involved with  
17 this issue, haven't had time to read in great detail  
18 the entire document, but at this point in time I  
19 think my role, at least as of right now is, like  
20 Mr. Yank said, to try and facilitate communication.  
21 Again I'm not pointing fingers at anybody, because I  
22 wasn't involved at an earlier date, but I think there  
23 has been a lack of communication for whatever reason  
24 and based on whoever's fault, it doesn't matter at  
25 this point as far as I'm concerned. I want to

57-4  
cont

57-5

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1 facilitate communication with the board, with staff,  
2 with Ascent, because I think this is low hanging  
3 fruit that could be easily addressed and I think it  
4 can make everybody satisfied and it can result in  
5 Tahoe Meadows supporting the overall project, which  
6 is what I think we would like to do.

7 Again the main concern, as Mr. Yank  
8 pointed out, I will sort of reiterate, maybe describe  
9 it in a different way, is this design issue and it  
10 really relates to the westerly terminus of the  
11 project. As you're heading to the Y from here at  
12 some point the project is going to have two turn  
13 lanes and at some point it will transition back to  
14 the one turn lane to the Highway 50 we love and know  
15 at the moment.

16 All Tahoe Meadows is really asking is  
17 that this transition point be slid just a little bit  
18 back this way, a little bit back toward the east, and  
19 it seems like a minor adjustment, and it is  
20 relatively speaking a minor adjustment in this, but  
21 it will have serious benefits by doing it,  
22 significant benefits by doing it.

23 I will point out from the exhibits I  
24 think the closest we could get from looking at the  
25 project document, I think it was Exhibit N, I want to

57-5  
cont

1 say, we still aren't exactly sure where this  
 2 transition is going to take place. We have a pretty  
 3 good idea, but we don't see any numbers to a  
 4 surveyor's level of certainty in the document, so  
 5 we're making some assumption here and I would love to  
 6 be told that I'm wrong and I've got this way farther  
 7 west than it need be, but based on what we've seen it  
 8 looks like these two center turn lanes are going to  
 9 be right in front of the entrance to Tahoe Meadows  
 10 and they don't need to be moved very far to address  
 11 what is Tahoe Meadows's primary issue.

57-5  
cont

12 As Mr. Yank pointed out, this is not just  
 13 an academic issue. This has serious consequences and  
 14 two serious consequences to note. One is this will  
 15 just eliminate left in, left out access at Tahoe  
 16 Meadows and you don't have to have much of an  
 17 imagination to understand people that maybe decide  
 18 they are going to turn there any way, what kind of  
 19 consequences that will have.

20 Secondly, in order to create the real  
 21 estate for that additional center lane you need to  
 22 eat up a portion of the Linear Parkway and a portion  
 23 of what effectively is kind of the margin of safety  
 24 for people coming in and out of Tahoe Meadows. You  
 25 will have a right lane traffic jam near constantly,

57-6

1 certainly in the summertime near constantly if this  
2 margin of error, this additional area is eaten up at  
3 that portion for a turn lane.

4 So again I'm here to facilitate  
5 communication now and I think hopefully over the next  
6 few months, hopefully everybody agrees to take my  
7 calls or otherwise meet with me. I will certainly do  
8 what I can on my end.

9 In any event we look forward to working  
10 with you to resolve this issue. I think it can be  
11 resolved. I appreciate the comment from Ascent  
12 earlier that CEQA requires a considered, careful  
13 response to this concern. I thought it was important  
14 enough to cite the CEQA regulation in my letter,  
15 although I notice I put it in a footnote. I should  
16 have put it in the body of the letter itself, because  
17 I think when this is addressed, based on everything I  
18 know at this moment, I don't see how this cannot be  
19 properly resolved. It's in everybody's interest to  
20 do so.

21 Thank you.

22 MR. TESHARA: Thank you, sir, I  
23 appreciate it.

24 I think just because there are so many  
25 people here from Tahoe Meadows that it would be worth

57-6  
cont

57-7

1 our district manager clarifying where we're at in the  
2 design process. None of the alternatives are  
3 anywhere near final design. So I believe that and  
4 appreciate the comment in your letter that you want  
5 to work with us to resolve the design issue.

6 Carl.

7 MR. HASTY: Yes, a couple of points of  
8 clarification for the board and the audience.

9 One, the Tahoe Meadows community has been  
10 very involved and constructive throughout this entire  
11 multi-year process. So we will continue to work with  
12 you all in addressing this.

13 Two, to the Chairman's point, for the  
14 environmental document, at best this is at a  
15 30 percent design level. It is difficult to get at  
16 some of the details, because those details don't yet  
17 exist. Having said that this is kind of worse case  
18 scenario, this environmental document. So the final  
19 design and addressing issues and concerns like yours,  
20 which we remain aware and I apologize if it looks  
21 like there has been some slip here, we remain aware  
22 and will be addressing this and working with you on  
23 this, because certainly it's not our intent nor has  
24 it been the intent of this project do anything  
25 adverse in that way.

57-7  
cont

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1 MR. YANK: All we've got is what is in  
2 front of us and unless we have some written guarantee  
3 at the end of the back and forth between us, we're  
4 not --

5 MR. TESHARA: You're not exactly on the  
6 record.

7 MR. HASTY: This is what this process is  
8 all about.

9 MR. TESHARA: You can continue the  
10 conversation --

11 MR. YANK: You get the message,  
12 Mr. Hasty.

13 MR. HASTY: Absolutely.

14 MR. TESHARA: The next person that I have  
15 on my list who wishes to speak is Linda Manning.

16 MS. MANNING: I would like to relinquish  
17 my time. I don't need to speak.

18 MR. TESHARA: Okay, thank you.

19 Janet Liolios.

20 MS. LIOLIOS: Yes, I will also relinquish  
21 my time to our president, if he would like to speak.

22 MR. TESHARA: If he needs any more time,  
23 okay.

24 And George Liolios.

25 MR. LIOLIOS: Same.

57-7  
cont

57-8

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1 MR. TESHARA: Thank you, sir. I  
2 appreciate that.

3 Is there a John Messina that wishes to  
4 speak? Come forward, sir. Good morning.

5 MR. MESSINA: Good morning. John  
6 Messina, local resident.

7 Couple of things actually. One is you're  
8 talking about the problems of people using the Loop  
9 Road to go through the residential neighborhoods, I  
10 guess they call it Rocky Point. It seems to me once  
11 before they had put up a gate at Heavenly Village Way  
12 on Montreal Road to prevent that. I'm wondering why  
13 they don't just leave it like that. They could put  
14 up one there and one at Fern Road and there would be  
15 no traffic going through the residential area. It  
16 would be a lot cheaper than spending millions of  
17 dollars for a new road. Traffic could still go up  
18 Heavenly Village Way and around the Loop Road to get  
19 around the casinos so there would be no interference  
20 there.

21 Also if this road was to go actually  
22 straight from Pioneer Trail to down by Kingsbury, I  
23 could see it as actually being a traffic improvement,  
24 but all three of the plans retain that horrible  
25 curve, which with drunks driving it is an accident

57-8  
cont

57-9

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1 waiting to happen. The only reason I can see for  
2 that is the 50 or 60 people, poor people down by  
3 Pioneer's homes are expendable and the front lawn of  
4 a wealthy individual is not. I call that  
5 discrimination.

57-9  
cont

6 I'm all for the skyways and subways. We  
7 already have a subway going across Highway 50. It's  
8 just nobody knows it's there. If you're worried  
9 about a view, build another subway.

57-10

10 So the other impact to this is you call  
11 bicyclists and pedestrians an environmental issue,  
12 but taxpayers are being completely ignored. All of  
13 this is going to have an effect. The welfare housing  
14 is going to cost the taxpayers money in loss of  
15 revenue. That area is valuable property. It should  
16 be used for something that generates money, not loses  
17 it, and there was one other thing.

57-11

18 Well, anyway the taxpayers -- there  
19 should be -- the financial impact to this should be  
20 included in the environmental report. I mean, taxes  
21 and other people are part of the environment, too,  
22 not just bicyclists and pedestrians. I would like to  
23 know what it's going to cost. Here we have this  
24 organization that wants to spend millions of dollars  
25 on a Loop Road that most people don't want, but they

1 haven't got enough funds to fill the potholes. I  
2 think you ought to just scrap this and use the money  
3 to fill the potholes.

4 Thank you.

5 MR. TESHARA: Thank you, sir. I  
6 appreciate you taking the time to come here today.

7 Scott Sanford.

8 MR. SANFORD: I'm a Tahoe Meadows  
9 year-round resident.

10 MR. TESHARA: Do you want to speak or  
11 relinquish your time?

12 MR. SANFORD: Just for a second.

13 MR. TESHARA: So it's on the record, come  
14 to the podium, state your name.

15 MR. SANFORD: Scott Sanford, I'm a Tahoe  
16 Meadows year-round resident and registered voter here  
17 in El Dorado County, and I just want to thank our  
18 president and our attorney for coming up with the  
19 same issues that we're all concerned with.

20 My problem with this whole thing was that  
21 we have been told all along that our interests are  
22 being considered, yet in the document we're not and  
23 that's my biggest beef as a local resident and  
24 homeowner and taxpayer.

25 That's all.

57-11  
cont

57-12

1 MR. TESHARA: Thank you, sir. I  
2 appreciate it.

3 MaryAnn Sanford, good morning.

4 MS. SANFORD: Good morning.

5 I'm MaryAnn Sanford. I'm a resident of  
6 Tahoe Meadows full-time, and I just want to say if we  
7 don't keep our left turn in, left turn out it's a  
8 tragedy waiting to happen, not just one tragedy, many  
9 tragedies.

10 Oftentimes in the summer fire trucks have  
11 to come in there. We have a lot of elderly in there.  
12 If they can't get in there a matter of minutes can be  
13 life or death for them.

14 That's all. I think that's very  
15 important. Not opposed to the Loop Road, just the  
16 left in, left out.

17 Thank you.

18 MR. TESHARA: Thank you.

19 So that's the end of my sign-up list, but  
20 if there is anyone else who issues to speak? I see a  
21 hand in the back. Do you wish to come forward? Good  
22 morning.

23 MR. BROWN: Good morning.

24 My name is Dan Brown. I'm a 46-year  
25 resident of Lake Tahoe. I live at 856 El Dorado

57-13

57-14

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1 Avenue, so I'm not impacted by this, but as a little  
 2 historic perspective I worked on the redevelopment  
 3 and the Loop Road with the city council and back when  
 4 Terry Trupp was the mayor and the TRPA wasn't in the  
 5 least bit interested in the CalTrans bypass and the  
 6 Loop Road at the time and they could care less about  
 7 the environmental impacts then, but now all of the  
 8 sudden there is a necessity because somehow, some way  
 9 there is an environmental impact.

10 Whenever you create a funnel effect on a  
 11 highway you're asking for trouble and whenever you  
 12 create a funnel effect you're asking for even more  
 13 pollution than you have right now. I thought your  
 14 mandate was to protect the lake. This in no way  
 15 protects the lake and it would have to be proven  
 16 beyond a shadow of a doubt that what you're trying to  
 17 do here actually protects the lake.

18 All it does is eat up a lot of money that  
 19 could be better spent elsewhere in protecting the  
 20 lake. Improvements could be made without the  
 21 gigantic environmental impact that this project is  
 22 going to create.

23 So before you endeavor to go through with  
 24 something like this I think it needs a whole lot more  
 25 consideration and I think the impact that it's going

57-14  
cont

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1 to create also needs to be considered, and above all  
 2 the environment that you are here mandated to protect  
 3 needs more protecting.

57-14  
 cont

4 Thank you.

5 MR. TESHARA: Thank you, Mr. Brown.

6 Mr. Mosur.

7 MR. MOSUR: Good morning, Board. Ed  
 8 Mosur, resident of South Lake Tahoe.

9 Yes, I live in the Lakeside Park area and  
 10 I spend a great deal of time crisscrossing this area  
 11 every day, and I think 99.5 percent of the time there  
 12 isn't a traffic problem or an environmental problem  
 13 resulting from the traffic. It's just crunch time  
 14 and look at highways and freeways, you can build  
 15 twelve lane freeways and you still have traffic  
 16 backed up 20 miles.

57-15

17 First I would like to talk about  
 18 addressing affordable housing and workforce housing  
 19 needs that you have in your project goals. This  
 20 started out as a transportation project and it's kind  
 21 of digressed to affordable housing and workforce  
 22 housing as part of the project in one of its chief  
 23 assets.

57-16

24 Number two is reducing cut-through  
 25 traffic in neighborhoods. On an environmental level

57-17



1	I see Pine Boulevard, which is already an alternate	
2	route, will become more of an alternate route with	
3	this. People going west will be -- when they get to	
4	the roundabout or the light here at the end of the	
5	casino corridor they are going to be going right down	
6	Lakeshore Parkway along the golf course. Pine	
7	Boulevard you only have to deal with one stop sign to	
8	get back up to Highway 50. It will be a lot quicker.	57-17 cont
9	It will be a shorter route. So that will be your	
10	alternative 50. You're still going to have	
11	cut-throughs through the neighborhoods and it's only	
12	one lane each way there. So you're creating another	
13	cut-through that already does exist to some extent	
14	and is going to be far greater.	
15	People will run across from Rocky Point.	
16	If you have the barrier wall all the way across	
17	through there people will still probably go across it	
18	and everything to run down to cut short rather than	57-18
19	go all the way down to the highway and around. It	
20	will be a shortcut and create problems with them	
21	running across the highway. That will happen.	
22	If you have a sound barrier, sound walls,	
23	which you show there is not -- I don't see as being	
24	that effective. High walls, if you look where they	57-19
25	have them along the highways, they build them up	

1 along next to the housing off of the highway, because  
2 when you put it right near the traffic, if you have  
3 ever been around one, the noise bounces off,  
4 especially trucks and buses and higher vehicles. It  
5 goes against the wall, back up against the vehicle  
6 and bounces over and it actually acts as a resonator  
7 and is actually louder and you a get a bump, bump,  
8 bump, bump staccato sound to it. So that defeats the  
9 purpose having it right alongside the road.

57-19  
cont

10 The casino core is a wind tunnel.  
11 Basically there could be five mile, eight mile an  
12 hour winds outside of it. As soon as you get by Mac  
13 P's, if you're in the casino core, it's far less.  
14 There's times I have to get off my bike to go through  
15 if I'm heading west into the wind there just because  
16 you almost come to a standstill. As soon as you  
17 break out and get out to Stateline Avenue and the  
18 corner there you jump back on and go. It's not  
19 pedestrian friendly. It's not bicycle friendly as it  
20 exists and you're still going to have that problem.  
21 You're not stopping the wind.

57-20

22 Van Sickle Park, exhaust fumes, the  
23 effect on trees and plants there. Years ago back in  
24 the early '70s I was in Riverside County when they  
25 put the freeway through there and killed the

57-21

1 vineyards along there and that is a problem around  
 2 the lake here finding trees dying from exhaust and  
 3 carbon monoxide. So it is going to effect Van Sickle  
 4 Park.

57-21  
cont

5 Access for emergency service vehicles,  
 6 police, fire, ambulance, you don't have what the  
 7 width is going to be, the total width with the bike  
 8 lane and with the one lane going through where  
 9 vehicles will not be able to pull over to allow  
 10 emergency vehicles to get through. So you're adding  
 11 excess time for emergency vehicles to get to the  
 12 casino core, which is very important, again a life  
 13 saving factor.

57-22

14 Last one is accommodating -- you've been  
 15 accommodating the Holiday Inn Express that you used  
 16 to own, Ms. McDermid, and also Crescent V making  
 17 considerations to help them for access to their  
 18 places, but not Tahoe Meadows.

57-23

19 So that's pretty much it. Thank you.

20 MR. TESHARA: Thank you, sir.

21 Anyone else wish to address this matter?

22 Ms. Eckmeyer, good morning.

57-24

23 MS. ECKMEYER: Good morning, Mr. Chair,  
 24 members of the board.

25 Shannon Eckmeyer, League to Save Lake

1 Tahoe. We will be submitting comments on the draft  
 2 environmental review. We made the comments at the  
 3 TRPA governing board meeting last month that we hope  
 4 to see some type of pilot project incorporating  
 5 transit solutions as part of the final environmental  
 6 review along with a more aggressive parking  
 7 management strategy.

8 So we continue to look forward to working  
 9 with your staff and going through our comments.

10 Thank you.

11 MR. TESHARA: Thank you, Shannon,

12 Anyone else? Yes.

13 MR. TANCREADY: Good morning, Mr. Chair,  
 14 members of the board.

15 I'm Steve Tancready, property owner on  
 16 Chonokis Road here in South Lake Tahoe. It's been in  
 17 the family since 1958. Hearing people who are  
 18 against this project obviously do not have a clue of  
 19 what we're dealing with in that neighborhood being  
 20 used as a cut-through, people doing 40 to 50 miles an  
 21 hour up that street in a residential street, using  
 22 our front yards as turnarounds when the traffic does  
 23 back up, because people simply cannot get through.

24 Responding to what another person in the  
 25 audience mentioned about the barricade that used to

57-24  
cont

57-25

1 be at Heavenly Village, Lake Parkway and Montreal.  
 2 That was an absolute joke because people went around  
 3 it all the time. Then they took it down for whatever  
 4 reason, which dumped even more traffic on our street.

5 So as far as I'm concerned this Loop Road  
 6 thing for me is not going to happen fast enough and  
 7 for all the safety, you know, for us I see a big  
 8 benefit in it.

9 MR. TESHARA: Thank you, Mr. Tancready.  
 10 Ms. Yanish.

11 MS. YANISH: Hi, good morning.

12 My name is Natalie Yanish. I'm a  
 13 resident here in Douglas County on Kingsbury Grade  
 14 and I have just one comment. I was very pleased to  
 15 see that there was some mitigation for the affordable  
 16 housing elements that was in the document, so I  
 17 appreciate that it was not just looked at  
 18 environmentally, but also in a social and community  
 19 way.

20 Then I have just one more of a question  
 21 here. In the document it states that there is -- the  
 22 proponent shall determine that all Rocky Point storm  
 23 water improvements continue to be the goals for which  
 24 they were established, including meeting or exceeding  
 25 6.4 pounds of sediment reduction per State of

57-25  
cont

57-26

57-27

1 California dollars spent on the site improvements,  
2 and I wasn't to able to see exactly how much that  
3 dollar amount was, but it sounds like that would be a  
4 very good mitigation and environmental improvement  
5 for the area, and I know at this point that that  
6 dollar amount might not be completely determined, but  
7 if anybody had any comments on what that might be  
8 times that 6.4 pounds of sediment reduction that  
9 would probably help me out in understanding the  
10 environmental improvement for storm water drainage in  
11 that area.

12 Thank you.

13 MR. TESHARA: Thank you.

14 Anyone else wish to address the board on  
15 the public hearing on the environmental document for  
16 the US50/South Shore Revitalization Project?

17 Yes, sir.

18 MR. HOWARD: My name is Michael Howard.

19 I live in the Rocky Point area and talking  
20 environmentally here and the cost of what this whole  
21 loop project is, we will stick to the environment, I  
22 guess, I've got paperwork that says we're cutting  
23 down 300 trees throughout here, give or take ten, I  
24 guess, and when I'm up in the mountains skiing or I  
25 have tourists or friends come here and we take them

57-27  
cont

57-28



1 up there, we look down and you see the top of all the  
2 buildings. We go 300 trees this way into the Rocky  
3 Point area that's just another eyesore in my view of  
4 the whole thing. To make this Loop Road that's what  
5 we're going to end up with.

57-28  
cont

6 Secondly, I have driven for Blue Go Bus  
7 Company and I noticed that with the traffic here it's  
8 due to all the pedestrians around the casinos and  
9 trying to get across the street and that's just like  
10 everybody is walking slowly. In the bus it takes  
11 minutes to get through there. It's either more  
12 police we need to speed it up or environmentally I  
13 like the skywalk things, put two or three of these in  
14 somewhere and that keeps all the tourists moving back  
15 and forth over the top, because you know yourselves  
16 when we get in there it's just so hard to make a  
17 right-hand turn into Raley's and everything else that  
18 it's much -- it would be easier, I think, might be a  
19 lot cheaper, give it a different look, and we would  
20 save a little bit of the environment tree-wise.

57-29

21 When you go to different places or people  
22 that come up here, they want to go down the main  
23 drags. They want to see the lights. They want to  
24 see the shops. If you get off on the business  
25 by-loops or whatever they are called you're missing

1 the whole thing and then they have to come back and  
2 start all over again, you know.

3 So in my estimation, and we can argue  
4 about the other points, B, C or D eventually, I  
5 guess, the skywalks would be pretty neat, save a lot  
6 of trees, wouldn't pour a whole lot of concrete.  
7 When you're looking down, we've all been there skiing  
8 and stuff, it just gets bigger and bigger all the  
9 time and it takes away from the view of the lake.

10 That's all. Thank you.

11 MR. TESHARA: Thank you, Mr. Howard.

12 Anyone else wish to address the board at  
13 this public hearing?

14 Okay, seeing none we will close the  
15 public hearing today. As was mentioned, there will  
16 be another public hearing just like this next  
17 Wednesday in this very same room. The Advisory  
18 Planning Commission of TRPA will be doing that very  
19 early on its agenda. The meeting will start at 9:30  
20 and then the governing board meeting will be here on  
21 the 28th, another hearing.

22 So I appreciate everybody who came today.  
23 Hope to see you at a future hearing. Thank you for  
24 your comments, which will be part of the record and  
25 will get a response, and again thank you.

57-29  
cont

57-30

Public Hearing

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1                   Comments or questions before we finish  
2 this from the board?

3                   Ms. McDermid.

4                   MS. McDERMID: I just want to put on the  
5 record I was never the owner of the Holiday Inn  
6 Express. That was Charles McDermid, who was the  
7 owner, but I had no financial interest in the Holiday  
8 Express ever.

9                   MR. TESHARA: Thank you, Nancy.

10                  Anyone else wish to --

11                  MR. HASTY: I just want to note this the  
12 47th day of the 75 day comment period. So there's 28  
13 more days before it closes on July 7th.

14                  MR. TESHARA: I see your hand, Mr. Brown.  
15 I did close the public hearing, but is there  
16 something else that you wanted to put on the record?

17                  You have to come up here. I'm giving you  
18 an exception here because I know you're a long-time  
19 resident.

20                  MR. BROWN: I was just wondering --

21                  MR. TESHARA: Again for the record, Dan  
22 Brown, 46-year resident.

23                  MR. BROWN: Yeah, Dan Brown, 46-year  
24 resident, live over on El Dorado Avenue.

25                  I was just wondering if affected property

57-30  
cont

57-31

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1 owners, if there was going to be like a workshop with  
2 the proposed -- the different proposals that might  
3 come up, if affected property owners would have an  
4 ability to see, you know, how their properties were  
5 going to be affected, whether through eminent domain  
6 or a sound wall or how this was going to be done?

7 MR. TESHARA: Okay.

8 MR. BROWN: Is there going to be a  
9 workshop in the future specifically for that?

10 MR. TESHARA: We will ask the staff to  
11 respond to that.

12 MR. BROWN: Okay, thank you.

13 MR. TESHARA: Thank you.

14 Again the hearing is closed. If anybody  
15 else wants to speak to the board we will do a public  
16 comment period at the end of the meeting, but we do  
17 have other items on the agenda we want to move on.

18 I will ask our staff to perhaps give an  
19 indication to Mr. Brown in response to his question.

20 MR. HASTY: Over the years we have had  
21 numerous workshops. We do plan on having additional  
22 workshops and starting to focus on design once we get  
23 past the public comment period.

24 MR. TESHARA: All right.

25 We will take a break now.

57-31  
cont

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1 STATE OF NEVADA )  
 2 COUNTY OF WASHOE ) ss.  
 3  
 4

5 I, JANET MENGES, a notary public in and  
 6 for the County of Washoe, State of Nevada, do hereby  
 7 certify:  
 8

9 That I was personally present for the  
 10 purpose of acting as notary public and Certified  
 11 Shorthand Reporter in the matter entitled herein;  
 12

13 That said transcript which appears  
 14 hereinbefore was taken in verbatim stenotype notes by  
 15 me and thereafter transcribed into typewriting as  
 16 herein appears to the best of my knowledge, skill and  
 17 ability and is a true record thereof.  
 18

19 

20 JANET MENGES, CCR #206, RPR, CP

21 California CCR # 5785  
 22  
 23  
 24  
 25

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**Letter  
57****TTD Board Meeting  
June 9, 2017**

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- 57-1 The commenter provides instructions for public commenters during the public hearing. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during project review.
- 57-2 The commenter provides introductory information about his role as president of the Tahoe Meadows Association, background on Tahoe Meadows, and his objections to the project regarding safety. The commenter expresses concern that the Draft EIR/EIS/EIS does not mention the US 50/Lake Road intersection and that the project would remove the dedicated left-turn lane on US 50 at Lake Road, resulting in changes to the circulation for vehicles entering and exiting Tahoe Meadows. The commenter also provides background about the traffic that enters and exits Tahoe Meadows. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 57-3 The commenter requests that the project be revised so that people can continue to make left turns into and out of Tahoe Meadows. The commenter also notes correspondence with the prior TTD project manager, Alfred Knotts, for the project and asserts the correspondence states that the dedicated left-turn lane on US 50 in front of Tahoe Meadows could remain as it is today. See the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS and Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 57-4 The commenter expresses concern that the document does not mention the US 50/Lake Road intersection and that it would be difficult and unsafe for emergency responders and civilians to turn left into Tahoe Meadows without the center lane. The commenter expresses concern that reducing the Linear Park would result in safety hazards for vehicles, including garbage trucks, entering Tahoe Meadows. The commenter requests a meeting with the project planning staff to work on a solution. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 57-5 The commenter introduces himself as the legal representative for the Tahoe Meadows Homeowners Association. The commenter notes that his role is to facilitate communication between the TTD Board, staff, and Ascent to address the design issue related to eliminating the left-in/left-out access to Tahoe Meadows, which could be done by sliding back the transition to the turn lane on US 50 to the east. The commenter asserts that people would still turn left into Tahoe Meadows even if the left-in/left-out lane is eliminated. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 57-6 The commenter asserts that the Linear Park provides a margin of safety for people coming in and out of Tahoe Meadows and removing a portion of the Linear Park would result in a traffic jam in the right lane of US 50. The commenter reiterates their role to facilitate communication and points out that they included a citation to the CEQA regulation in their comment letter. See Master Response 2, “Effects on Tahoe Meadows Historic District,” and the responses to Comment Letter 16.
- 57-7 The commenter notes the Tahoe Meadows community involvement throughout the process. The commenter also notes the level of detail for the project analyzed in the environmental document is at a 30 percent design detail. The commenter also notes that the analysis in the environmental document assumes a reasonably foreseeable, conservative scenario to avoid



- understating potential impacts. The commenter acknowledges that TTD will work with Tahoe Meadows to resolve this issue and notes it is not the intent of the project to do anything adverse. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.
- 57-8 The commenter includes several speakers that relinquish their opportunity to speak. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.
- 57-9 The commenter suggests putting up a gate at Heavenly Village Way and Montreal Road to keep traffic from going through the Rocky Point neighborhood and traffic could still go up Heavenly Village Way and around the Loop Road to get around the casinos. The commenter also asserts that if the road were to go straight from Pioneer Trail to Kingsbury then there would be a traffic improvement, the curve in the road is prone to accidents, and the poor people down by Pioneer Trail are expendable and the front lawn of a wealthy individual is not. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided. See also the responses to the commenter's more detailed comments provided in Comment Letters 40 and 41.
- 57-10 The commenter expresses support for skyways and subways, noting that if there are concerns about views then build another subway. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during the review of the merits of the alternatives.
- 57-11 The commenter expresses concerns related to the economic impact of the project, including cost of welfare housing in an area that contains valuable property that could be used for something that generates money. The commenter would like to know how much the project is going to cost and suggests scrapping the project and using the money to fill the potholes. See Response to Comment 24-5. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during project review.
- 57-12 The commenter notes he is a year-round resident in Tahoe Meadows and expresses thanks to the Tahoe Meadows president and attorney for identifying issues they are concerned with. The commenter expresses concern that they have been told all along their interests were being considered yet this is not reflected in the environmental document. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during project review. See also Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 57-13 The commenter expresses their support for the project with the exception that the left-in/left-out access to Tahoe Meadows remain. The commenter notes that fire trucks need to access the neighborhood and elderly people need to be easily accessible. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 57-14 The commenter provides background as a long-time resident of Lake Tahoe and their previous experience working on redevelopment and the Loop Road. The commenter asserts that when you create a funnel effect on a highway you are asking for more pollution and the project could have to prove that it protects the lake. The commenter asserts improvements could be made without the environmental impact the project is going to create. Chapter 3,

- “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures,” of the Draft EIR/EIS/EIS contains comprehensive environmental analyses of 15 resources areas, the cumulative impacts of which are discussed in Section 3.19, “Cumulative Impacts.” The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.
- 57-15 The commenter suggests that a majority of the time, there is not a traffic problem or an environmental problem resulting from the traffic. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.
- 57-16 The commenter observes that the project started out as a transportation project that has digressed to affordable housing and workforce housing as part of the project’s chief assets. The affordable housing and workforce housing provided by the project would serve as replacement housing for residents displaced by the project, as described in Chapter 2, “Proposed Project and Project Alternatives,” on pages 2-5 and 2-6 of the Draft EIR/EIS/EIS. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during the review of the merits of the alternatives.
- 57-17 The commenter states that with the implementation of project alternatives, westbound vehicles on US 50 would use Pine Boulevard as an alternate route to avoid the tourist core and that cut-through traffic in adjacent neighborhoods would continue. See Response to Comments 12-17 and 24-4.
- 57-18 The commenter expresses concern that people will run across the road as a short cut, creating problems with them running across the highway. See Response to Comment 11-15 for a discussion of pedestrian access through the Rocky Point neighborhood with implementation of the project.
- 57-19 The commenter suggests that sound barriers would not be effective. The commenter suggests that traffic noise bounces off sound walls, bounces back toward the vehicles, and then bounces off tall trucks and buses resulting in higher noise levels. The commenter provides no evidence about why this would be the case for the sound barriers required by Mitigation Measures 3.15-3a, 3-15-3b, and 3.15-3c of the EIR/EIS/EIS. Mitigation Measure 3.15-3a specifies design criteria for sound barriers including that “the reflectivity of each sound barrier will be minimized to ensure that traffic noise reflected off the barrier does not contribute to an exceedance of applicable TRPA CNEL standards at other receptors. The level of sound reflection from a barrier can be minimized with a textured or absorptive surface or with vegetation on or next to the barrier.” Mitigation Measure 3.15-4 also specifies the same design criteria for minimizing the reflectivity of sound barriers. The comment offers no specific information or evidence that the analysis presented in the EIR/EIS/EIS is inadequate; therefore, no further response can be provided.
- 57-20 The comment asserts that the tourist core is a wind tunnel and there are times riders must get off their bicycle because the wind stops you. The commenter asserts the tourist core is not pedestrian or bicycle friendly and the problem with the wind would continue. Although it is true that the tourist core can become windy at times, implementation of Alternatives B, C, or D would result in improving safety and the experience for pedestrians and bicyclists as discussed under Impact 3.6-8 (page 3.6-67) of the Draft EIR/EIS/EIS:

Pedestrian and bicyclist exposure to vehicular traffic would be reduced with the improvements associated with Alternative B, including a pedestrian bridge over the

new US 50 alignment connecting Van Sickle Bi-State Park to the Stateline area; shoulders/bicycle lanes and pedestrian sidewalks along Lake Tahoe Boulevard (existing US 50) for the full length of the study segment; and bicycle lanes/shoulders along the new US 50 alignment with sidewalks on at least one side of the roadway. The cycle track option would further reduce bicyclist exposure to vehicular traffic and enhance bicyclist safety. The cycle track option includes a two-way bike path separated from vehicular traffic by a barrier along the westbound side of Lake Tahoe Boulevard.

Safety of the existing pedestrian crossings along US 50 would be improved because of reduced traffic volumes and shorter crossing lengths associated with the narrowing of the existing US 50 roadway geometry. Additionally, Alternative B would include a new traffic signal at the Van Sickle Bi-State Park entrance that would provide a dedicated pedestrian crossing phase where none exists today.

Alternatives C and D would also result in similar improvements for bicyclists and pedestrians as described for Alternative B above (page 3.6-68 through 3.6-70 of the Draft EIR/EIS/EIS). The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.

57-21 The comment expresses concern about the potential effects of vehicle-generated exhaust and carbon monoxide (CO) on trees and other vegetation along roadways. As described in Section 3.13, "Air Quality," of the Draft EIR/EIS/EIS, implementation of transportation improvements would result in changes to traffic patterns and delay times at affected intersections. However, implementation of transportation improvements with any of the alternatives would not result in operational-related CO emissions that could exceed applicable standards or expose receptors to high CO concentrations. Further, the modeling results shown in Appendix J of the Draft EIR/EIS/EIS indicate that project-related CO emissions would not cause or contribute to any new or worsened localized violations of the federal 1-hour or 8-hour CO ambient standards. Although project-related effects of vehicle emissions on trees and other vegetation along roadways has not been quantified or analyzed in detail, it is assumed that these levels of project-related emissions would not result in vegetation mortality or loss of vigor substantially above existing levels.

57-22 The comment asserts that the project would increase emergency response times through the tourist core because vehicles would not have sufficient space with the bicycle lane to pull over to allow emergency vehicles to pass. Impact 3.6-9 and Impact 3.6-19 address impacts on emergency access in 2020 and 2040, respectively. As described on page 3.6-72 of the Draft EIR/EIS/EIS for Alternative B:

Emergency access to the parcels along existing US 50 between Park Avenue and Lake Parkway would be maintained and, although the roadway would be narrowed, traffic flow would be improved during the summer peak. Back and side street access to the parcels between Park Avenue and Lake Parkway would remain, thus providing multiple emergency routes.

Alternative D would result in similar conditions for emergency response as described for Alternative B (see page 3.6-74).

Additionally, Alternatives B and D would include either 5-foot bicycle lanes in both directions of travel or a 12-foot cycle track and 5-foot shoulders (see Exhibit 2-8 on page 2-19), which would provide space for vehicles to pull over to allow emergency vehicles to pass.

Alternative C would include a 5-foot wide bicycle lane through the tourist core that would provide space for vehicles to pull over to allow emergency vehicles to pass. However,

Alternative C, because of the one-way flow of traffic even with implementation of Mitigation Measures 3.6-9 and 3.6-19, this alternative would result in a significant and unavoidable impact on emergency response times (see pages 3.6-132 and 3.6-134).

For the reasons described herein and discussed in the Draft EIR/EIS/EIS, Alternatives B and D would not increase emergency response times through the tourist core related to the reduction in the number of vehicle travel lanes.

- 57-23 The commenter asserts that the Holiday Inn Express and Crescent V (i.e., Heavenly Village Center) have been accommodated by the project, but not Tahoe Meadows. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 57-24 The commenter states they will be submitting comments on the environmental review and hopes to see some type of pilot project incorporating transit solutions and a more aggressive parking management strategy. See Response to Comment 11-1.
- 57-25 The commenter provides background related to his status as a property owner on Chonokis Road and his experience living on a street that is used as a cut-through, in which people are driving fast and using front yards as turnarounds. The commenter also refers to another commenter’s suggestion for a barricade at Heavenly Village Way and Montreal Road, which he asserts people would drive around. The commenter states that the Loop Road is not going to happen fast enough and that it would provide a safety benefit. The comment expresses support for the project; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 57-26 The commenter provides background as a resident of Douglas County and states they are pleased with the mitigation for affordable housing that was in the document. The comment expresses support for the project’s affordable housing component; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 57-27 This comment refers to Mitigation Measure 3.10-3, “Protect functionality of Rock Point Stormwater Improvements.” This mitigation measure requires the project proponent to demonstrate that all Rocky Point stormwater Improvements continue to meet or exceed the 6.4 pounds of sediment reduction per State of California dollar spent on site improvements. The commenter asks to be informed of the dollar amount of State funds that were spent on the improvements, so that they may better understand the sediment reduction standard for the Rock Point stormwater improvements. According to the Rocky Point Erosion Control Project Fact Sheet (TRPA 2006), \$1,600,223 State of California dollars were spent on the Rocky Point Erosion Control Project.
- 57-28 The comment asserts that removal of 300 trees would be an eyesore when up in the mountains skiing. Tree removal associated with the project alternatives is addressed in Impact 3.16-3 on pages 3.16-18 through 3.16-21 and Mitigation Measure 3.16-3 on pages 3.16-27 through 3.16-28 of the Draft EIR/EIS/EIS. The commenter expresses an opinion and does not raise specific concerns about the adequacy of the environmental document. The visual impacts of the project related to scenic vistas or scenic resources are addressed in Impact 3.7-2 on pages 3.7-42 through 3.7-45 of the Draft EIR/EIS/EIS. Because the area described by the commenter is already developed, the removal of trees in this area would not create a new impact on scenic vistas from the mountaintop. The comment is noted for consideration during the review of the merits of the alternatives.

- 57-29 The commenter describes their experience as a BlueGo Bus driver and asserts that the pedestrians around the casinos cause the traffic. The commenter suggests more police to speed things up or build skywalks, which would be easier, cheaper, would provide a different look, and save a little bit of the environment. The comment expresses support for a skywalk; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 57-30 The comment describes the public hearing process, including additional public hearings, and provides closing remarks. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during project review.
- 57-31 The comment inquires if there will be another public workshop for the affected property owners to see how their properties would be affected, if there would be eminent domain, or if there would be a sound wall. Carl Hasty of TTD provided a response that TTD plans on having additional workshops after the public comment period. The Draft EIR/EIS/EIS summarizes the number of potentially affected parcels on pages 2-24 through 2-26 and 2-31 through 2-33 and described on page 3.4-41:
- The list of parcels identified for acquisition is preliminary but represents the maximum number of acquisitions required for implementation of the build alternatives. The complete list of parcels proposed for acquisition for each alternative is included in Appendix B, "Maps Showing Parcel Acquisition Needs and Geometric Approval Drawings for Alternatives B, C, and D," and represents the maximum number and extent of acquisitions that would occur. Refinements to the final project design could result in a smaller project footprint, which could result in fewer partial and/or full acquisitions.
- The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during project review.

**Draft EIR/EIS/EIS**  
**Public Hearing Comments**  
**TRPA Advisory Planning Commission**

Letter  
58

**Date:** Wednesday, June 14, 2017  
**Time:** Beginning at 9:30 a.m.  
**Location:** TRPA Offices, Stateline, NV

**Meeting Purpose:**

Receive oral comments on the US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS.

**Attendees:** TRPA Advisory Planning Commission (APC) members, TRPA staff, TTD staff, and interested stakeholders.

#	Commenter	Summary of Comments
1	Mike Johnson, Tahoe Meadows Owners Association President	Commenter provides description and history of Tahoe Meadows neighborhood. We think westerly terminus of project would be at the entrance to Tahoe Meadows neighborhood. Understands not all design plans are completed at this phase and his comments may be premature. Describes proposed roadway. Project will have two center-turn lanes that might be right in front of entrance to Tahoe Meadows which could cause two issues: First, turn lanes preclude left-in/left-out turns to and from Tahoe Meadows. Second, if there would be an extra turn lane then the land must come from somewhere – the Linear Park. Problem for traffic turning right into Tahoe Meadows, which stops at key pad, there is enough room now but adding cars after removing some of Linear Park would cause build-up of traffic into highway. Has been told there are promising meetings between TTD staff and members of Tahoe Meadows.
2	John Messina	Last meeting, he mentioned closing off Montreal Road at Heavenly Parkway and Fern to avoid traffic through neighborhood. He proposes closing road completely. Would avoid tearing down houses. Don't have to displace people. Questions the project's ability to enhance economic opportunities and for who. This winter had an upturn in economy with higher wages for workers. Asserts the plan brings in welfare recipients which will undermine those salaries and have an unfair advantage. They are currently paying market rate for their housing. They will have to go on welfare to compete. Creating a welfare-dependent society. Not beneficial for Tahoe. Putting houses right in the middle of the casinos. Is this really a good place to raise kids? Questions that with over 300 housing units there would only be 50 kids? That's nonsense. There is no way 300 welfare houses would only have 50 kids. Talking about improving access to Van Sickle park. There is nothing wrong with access to Van Sickle Bi-State Park. Why are you trying to fix something that isn't a problem?
3	Shannon Eckmeyer, League to Save Lake Tahoe	Would like to see a pilot project in coordination with TRPA and TTD for transit and more aggressive parking management to be implemented with the project.

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#	Commenter	Summary of Comments	
4	David Silva	Received something in mail and wonders which alternative this piece of mail refers to. Sees property values decreasing in that area. Based on some alternatives sees property values decreasing and seeing noise and traffic more of a problem, which also contribute to property value decrease. Thought heard no more road, but thinks this makes more roads. And widening roads. And adding bridges really impacts the environment of the mountain.	58-6
5	Carolyn Peterson	Commenter's family has owned their cabin since 1950. What are boundaries of the Rocky Point neighborhood? I have not heard of it referred to as Rocky Point. We live at eastern end of Chonokis and have not heard of this before.	58-7
6	Charlie Donohue, APC Member	I know you have been working with NDSP. Need to involve Nevada State Parks in addressing the rockery wall on mountain side. There will be a significant challenge in trying to access private property through Van Sickle.	58-8

**Letter 58**      **TRPA Advisory Planning Commission Meeting**  
June 14, 2017

- 58-1      The commenter asserts that the project's two center turn lanes in front of the entrance to Tahoe Meadows would preclude left-in/left-out access for Tahoe Meadows. The commenter also asserts that narrowing the Linear Park at the entrance would result in build-up of traffic into the highway. The commenter notes that he is aware that TTD staff have been meeting with members of Tahoe Meadows. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 58-2      The commenter suggests closing off Montreal Road at Heavenly Village Parkway to avoid traffic through the neighborhood and the need to avoid displacing houses and people. The commenter questions who would benefit, economically, from the project and describes upturn in the economy last winter and asserts the plan would bring in welfare recipients that would undermine salaries for existing workers. The alternative suggested would not meet the project's purpose, need, or project objectives. The Draft EIR/EIS/EIS analyzes an alternative that would avoid displacing residents. Alternative E described on pages 2-33 and 2-34 of the Draft EIR/EIS/EIS is analyzed throughout the resource sections of the Draft EIR/EIS/EIS. Economic effects of the project are addressed in Section 4.6 on pages 4-10 through 4-23 of the Draft EIR/EIS/EIS. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.
- 58-3      The commenter questions putting houses in the middle of the casinos as a good place to raise children. The commenter also questions that 300 welfare housing units would only have 50 kids. Potential impacts on schools from additional students are assessed under Impact 3.5-7 on pages 3.5-39 through 3.5-42 of the Draft EIR/EIS/EIS. New students generated by the project were estimated using a student generation factor available for El Dorado County.
- 58-4      The commenter questions the need to improve access to Van Sickle Bi-State Park when, he asserts, there is nothing wrong with access to the park. With implementation of Alternatives B through D, a small portion of Van Sickle Bi-State Park would be acquired for the realigned US 50. As described on page 4-9 of the Draft EIR/EIS/EIS, these alternatives

would acquire approximately 0.1 percent of the acreage of the park. As described on page 2-6 of the Draft EIR/EIS/EIS:

In response to public comments received during scoping and concerns expressed by the California Tahoe Conservancy (Conservancy) and Nevada Division of State Parks (NDSP) regarding access to Van Sickle Bi-State Park resulting from the highway realignment, Alternatives B through D include a new pedestrian bridge extending over US 50 at a point just west of the Harrah's entrance driveway.

- 58-5 The commenter would like to see a pilot project for transit and parking management implemented with the project in coordination with TTD and TRPA. See Response to Comment 11-1.
- 58-6 The commenter expresses concern about property values decreasing in the study area associated with noise and traffic. The commenter also thinks the project would increase roads and widening roads although he had heard there would be no more roads. The commenter also notes that bridges really impact the environment of the mountain. Response to Comments 12-16 and 12-17 address the commenter's concern about expanded roadways. The effects of the pedestrian bridge over the realigned US 50 and the skywalk (Alternative E) are analyzed throughout the resource sections of the Draft EIR/EIS/EIS. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.
- 58-7 The commenter notes their family has owned their cabin at the end of Chonokis Road since 1950 and has not heard of the neighborhood referred to as Rocky Point. The commenter asks for the boundaries of the Rocky Point neighborhood. The Draft EIR/EIS/EIS on pages 2-2 through 2-3 describes the Rocky Point neighborhood under Section 2.2, "Regional and Local Setting":
- The "project site" encompasses the infrastructure footprint and the abutting land to contain the potential construction disturbance areas of any of the alternatives. It is aligned along the existing routes of US 50 and Lake Parkway, and includes portions of the Rocky Point residential neighborhood west of the Heavenly Village Center.
- The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS. The comment is noted for consideration during project review.
- 58-8 The commenter recognizes that the project team has been coordinating with NDSP. The commenter asserts that the project needs to involve NDSP in the rockery wall on the mountain side and asserts that there will be a significant challenge in trying to access private property through Van Sickle Bi-State Park. Section 5.3.1, "Section 4(f) Consultation," in the Draft EIR/EIS/EIS describes the history of coordination between TTD and the land managers, including NDSP, of Van Sickle Bi-State Park (see pages 5-2 through 5-3 of the Draft EIR/EIS/EIS). Additionally, as noted in Table 1-3 on page 1-14 of the Draft EIR/EIS/EIS, the project would be required to obtain concurrence from NDSP and California Tahoe Conservancy on the Section 4(f) determination with respect to potential impacts and mitigation measures for Van Sickle Bi-State Park. There are no plans as part of the project to access private property through the park. See the discussion under header "Project Refinements to Alternative B" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS for details on access to the Gondola Vista property.

**Draft EIR/EIS/EIS  
Public Hearing Comments  
TRPA Governing Board**

**Letter  
59**

**Date:** Wednesday, June 28, 2017  
**Time:** Beginning at 11:00 a.m.  
**Location:** TRPA Offices, Stateline, NV

**Meeting Purpose:**

Receive oral comments on the US 50/South Shore Community Revitalization Project Draft EIR/EIS/EIS.

**Attendees:** TRPA Governing Board (GB) members, TRPA staff, TTD staff, and interested stakeholders.

#	Commenter	Summary of Comments	
1	Clem Shute, Governing Board Member	Can someone explain how the 1-way (Alternative C) works?  <u>Response from Carl Hasty:</u> One direction through the core and the opposite direction going around the mountain outside on mountainside. This was intended to try and reduce the project footprint. Does bring about questions related to confusion and workability.	59-1
2	James Lawrence, Governing Board Member	Has noticed grading has started on one of the projects between State Park and existing road. Are there any impacts to access to those properties as a result of the alternatives, specifically from the preferred alternative?  <u>Response from Carl Hasty:</u> That is the Gondola Vista project. There are 20 condo units approved there. There is a 50-foot setback. We'll still be able to address right of way needed for the project. There is one entrance approved for that project. We'll be looking at design to maintain access for that property.	59-2
3	James Lawrence, Governing Board Member	Is a 50-foot typical throughout project area?  <u>Response from Carl Hasty:</u> That was a city setback. Local area plan had 70-foot setbacks, but an exception was sought for 50-feet. TTD was consulted about right-of-way (ROW) anticipated for that property.	59-3
4	James Lawrence, Governing Board Member	More specifically, what is the setback between the proposed road and homes that would stay in Rocky Point?  <u>Response from Steven Robinson:</u> We don't have a setback defined right now. Some parcels could be 10 feet and others might be 30 feet. Setback will vary parcel by parcel to minimize ROW impacts.  <u>Response from Carl Hasty:</u> acquisition of ROW – once it's finalized, we know what project is, and then final design and know what highway configuration and acquisition – will vary.	59-4
5	Richard Hanes	Resident adjacent to US 50 and between lodge road and emergency lodge road intersection.  Two concerns:	59-5

#	Commenter	Summary of Comments	
		<p>Access to Tahoe Meadows</p> <p>Public safety access</p> <p>Emergency access to TM requires ability to make left-turn into historic district for emergency access and evacuation.</p> <p>Fire access and emergency evacuation requires the ability to use center left-turn lane.</p> <p>Lodge Road emergency access road not clearly addressed in environmental document.</p> <p>Large vehicle access needs center left-turn lane.</p> <p>2<sup>nd</sup> concern - Lake Road intersection safety issues – heavily used during peak season. Presently, Lake Road intersection is safest entry into TM</p> <p>Right-turn entry has been site of accidents at this intersection. Requires slowing of traffic, is prohibitive for large vehicles and trailers, and making an exit there you have to make a U-turn if you want to be eastbound.</p> <p>Proposed linear park reduction compromises safe entry into the District. Any reduction reduces safety. Stop signs are not observed by bikes or walkers.</p> <p>Strongly ask that preservation of linear park space be addressed</p>	59-5 cont
6	Shelly Aldean, Governing Board Member	<p>GB received copy of letter from Michael Johnson, representing TM. Final paragraph in his letter indicates TTD is working on this issue. Is this the same issue as Mr. Hanes'?</p> <p>Mr. Hanes: confirms his comments are same as those identified in Michael Johnson's letter.</p>	59-6
7	Cathy Sweeney	<p>Represents Tahoe Meadows.</p> <p>It's true TM and TTD staff have been discussing issues brought up by designs in EIR/EIS. However, comments are made on published document. Hopeful that tentative designs will be accepted, there is no guarantee.</p> <p>Provides background information about Tahoe Meadows, including as a registered historic place.</p> <p>ED does not mention Lake Road intersection. TM produces about 36,000 vehicle trips in summer. A lot of traffic to not have been addressed.</p> <p>3 main issues:</p> <ol style="list-style-type: none"> <li>1. Loss of left-in/left-out turning, hundreds of vehicles/day forced to make U-turns. U-turns would probably not be permitted.</li> <li>2. Drastic narrowing of linear park. Currently allows one large vehicle to get out of traffic while accessing keypad. Appendix N shows vehicles wouldn't have enough space without sticking out into traffic, creating an unnecessary hazard. Bikes and pedestrians would have to dodge out into traffic to get around vehicles waiting. Hopeful that TTD and Wood Rodgers will be able to come up with a solution.</li> <li>3. Emergency vehicle access at Lodge Road. Lodge Road gate is locked, but key is available for emergency responders. TM has 3 exit points, 1 main exit and 2 emergency vehicle only exits.</li> </ol> <p>Exhibits show construction staging in front of Lodge road gate, which is unsafe.</p>	59-7
8	Patricia Murphy	<p>Lobbying for Alternative D, which saves her homes that are fully functioning.</p> <p>Recognizes there are some homes of substandard quality, which should be addressed by the City enforcing code.</p> <p>Cut-through traffic should have also been addressed long ago by TTD with installation of speed cushions or pillows that are conducive to emergency response vehicles.</p>	59-8

#	Commenter	Summary of Comments	
		Conditions in her neighborhood extend from Raley's to beyond and into Sierra Tract - every neighborhood has good, bad, and ugly homes. Fan of revitalization, takes care of her property and hopes others would too.	59-8 cont
9	John Messina	Representing people who have voted against this project. Claims the decisionmakers are not listening to the public. Skyway is a good alternative that works in Reno. Proposing skyway to Van Sickle but not over Highway 50. That's being hypocritical. Don't need any environmental reports. Make casinos take down walls concealing subways between the casinos. Intrusion of traffic in Rocky Point. Put barricade between Heavenly Village and Fern and close road. Loop road would still be accessible from Heavenly Village. Don't need to build a new entrance to Van Sickle park. Other issue is all the housing you want to build. You have a policy that is anti-labor. Labor workers suffering from recession and just now getting decent wages. You've just approved more houses and employees in Zephyr Cove. You want to put another 1,000 over here by the loop. You're giving subsidized housing. How can people who work in minimum wage jobs compete when you are giving someone else special privileges? A subsidized house, and a house that is not paying taxes either. No money into government budget, no money for schools, law enforcement, emergency equipment, fire protection. Literally stealing from every other taxpayer in the area to pay for subsidized housing. We already have more affordable housing than what California says we should have. This project would be a 50% increase in welfare housing and the other would double it. People are part of the environment, not just bears, trees, and the water.	59-9
10	Laurel Ames, Sierra Club	Notes long history of the project. Lots of attention on the road and now on a big road. 2012 Regional Plan had a transit emphasis - now there are two road projects (Fanny Bridge and Loop Road) and still being aspirational about transit. There isn't the energy and effort put towards transit as much as there has been energy put into the road aspect. This road won't improve traffic, which is stated in the document. Caltrans report says traffic flow will improve, but is a temporary reduction but then we are just going to get more traffic. Induced traffic comes from mixed-use projects and economic benefits. Comments on the ED in terms of traffic info, traffic studies, emphasis on LOS. Caltrans determined LOS is an aid to improve traffic, which is why they switched to VMT. Measuring VMT - VMT issue and State of CA says to measure VMT by per capita, which is silly to use it here. We can see that when we add people that VMT is difficult to deal with. Points out in Jan/Feb had huge floods here in Tahoe. There are going to be more and bigger floods and we are not dealing with that. If we are going to protect the lake, we have to protect stream zones and flood ways. Can't just put in concrete. Have stream zones where flood waters are attenuating and can soak into the soil.	59-10  59-11

#	Commenter	Summary of Comments	
11	Ed Moser	<p>Project goals have gone from a traffic congestion problem to address affordable housing needs. If you visit any resort town – traffic is horrendous no matter what you build.</p> <p>Offers a solution to put a tower staffed by one person down by Park Avenue for remote control of signals to help traffic flow during crunch time.</p> <p>Regarding improving access to Van Sickle park – the existing access is fine.</p> <p>Crossing a 4-lane highway would be more difficult than exists now.</p> <p>Closing the ends of local streets is a possible, cheap solution to pass through.</p> <p>Give Google a mitigation fee to take it off their maps.</p> <p>Pine Blvd alternate instead of above casinos. What's going on now in Rocky Point will go on there.</p> <p>Stakeholders – if economic benefit then have stakeholders help pay for the project.</p> <p>Strongly opposed to spending \$90 to 100 million.</p>	59-12
12	Steve Tancready	<p>Offers thanks for the TTD field trip and TRPA discussing issue with residents.</p> <p>Supports the project.</p> <p>Traffic on the street is a city problem, but the city has not put in more speed bumps or done anything.</p>	59-13
13	Belinda Faustinos, Governing Board Member	<p>Concerned about how the project would impact this local community.</p> <p>Accommodation to ensure replacement housing constructed is important.</p> <p>Obviously, an impacted area with low income population with not as much experience.</p> <p>Clearly heard – there are much more low-income residents in that area than the accommodations would allow for. Look into any accommodation that could be made to further increase the number of affordable housing for that population and so they can still live near where they work.</p>	59-14

**Letter 59**      **TRPA Governing Board Meeting**  
June 28, 2017

59-1      The commenter asks for an explanation of how the one-way alternative (i.e., Alternative C) works. Carl Hasty of TTD provided a response, saying that one direction would go through the core and the opposite direction would go around the casinos on the mountainside in an effort to reduce the project's footprint. The Alternative C road network changes are also described on page 2-30 of the Draft EIR/EIS/EIS:

Alternative C would split eastbound and westbound directions on US 50 from the Park Avenue/Heavenly Village/US 50 intersection in California to Lake Parkway/US 50 intersection in Nevada. Eastbound US 50 would remain in place as under existing conditions, while westbound US 50 would be realigned onto a new alignment along Lake Parkway southeast of existing US 50.

59-2      The commenter noticed that grading has started on one of the projects between Van Sickle Bi-State Park and the existing road. The commenter asks if there are any impacts to access to those properties as a result of the alternatives. Carl Hasty provided a response, describing the Gondola Vista project, including the one entrance that has been incorporated into that project. He notes that TTD is coordinating the project design to maintain access for that property. See Response to Comment 3-2 and the discussion under the header "Project Refinements to Alternative B" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS.



- 59-3 The commenter asks if a 50-foot setback is typical throughout the study area. Carly Hasty provided a response, stating that was a city setback established in the Gondola Vista permit, the local area plan had a 70-foot setback, and there was an exception made for the project for 50 feet. He notes that TTD was consulted about ROW for that property. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.
- 59-4 The commenter asks what the setback would be between the proposed road and the homes that would stay in the Rocky Point neighborhood. Steven Robinson of Wood Rodgers, the project engineer, responded stating that a setback is not yet defined and could vary by parcel to minimize ROW impacts. Carly Hasty also responded, saying that final design and acquisition would vary once the project is finalized. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.
- 59-5 The commenter expresses concerns related to changes in access to Tahoe Meadows for public safety and emergency access, including at Lodge Road. The commenter also notes concerns related to potential for accidents associated with right turns into Tahoe Meadows, and reductions in the Linear Park width pose safety risks. The commenter requests that the Linear Park space be preserved. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 59-6 The commenter asks if the letter from Michael Johnson that the Governing Board received that indicates that TTD is working on the issue is the same issue as the previous commenter’s issue. The previous commenter confirms that it refers to the same issue. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.” The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.
- 59-7 The commenter notes that she represents Tahoe Meadows. The commenter also notes that Tahoe Meadows and TTD have been discussing issues brought up by the designs in the Draft EIR/EIS/EIS, but that the tentative designs discussed were not a guarantee. The commenter provides background about Tahoe Meadows and notes the environmental document does not mention the Lake Road intersection. The commenter also notes three main issues, including the loss of the left-in/left-out lane at the entrance to Tahoe Meadows, narrowing of the Linear Park, and maintaining emergency vehicle access. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”
- 59-8 The comment states their preference for Alternative D, because it would save her home. The commenter expresses concern related to cut through traffic and notes that every neighborhood from Raley’s to Sierra Tract have good, bad, and ugly homes. The commenter states their support for revitalization and notes that she takes care of her property and hopes others would too. The commenter states that Alternative D should be approved, because her home would be saved. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during the review of the merits of the alternatives.
- 59-9 The commenter asserts he is representing the people who voted against the project. The commenter supports use of skyways, subways, and a barricade between Heavenly Village Way and Fern Road. The commenter asserts that a new entrance to Van Sickle does not need to be built. The commenter also expresses concern related to the housing the project proposes, potential for subsidized housing that he asserts would put no money into the government’s budget, schools, law enforcement, emergency equipment, and fire protection. The commenter asserts there is already more affordable housing than required by California.

Regardless of whether the owner or developer is a public or private entity, the construction of housing units and mixed-use development would be required by the City of South Lake Tahoe to pay impact fees for their fair share of the costs of providing public services and maintaining adequate service levels, such as for law enforcement and fire protection. Future development would also be required to pay school impact fees to mitigate the potential impact associated with generating school demand by new students. The commenter offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.

59-10 The commenter notes the long history of the project and the transit emphasis of the 2012 Regional Plan. The commenter asserts that the project does not put much effort into transit and would not improve traffic and induced traffic would result from mixed-use projects and economic benefits. The commenter also notes Caltrans standards related to LOS and VMT. The commenter also submitted Comment Letter 12. TTD has amended their short-range transit plan to include a transit circulator service in the tourist core near the state line to be implemented as a phase of the project to coincide at the earliest with opening of the new alignment (see the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS). Please refer to Response to Comments 12-11 and 12-18 through 12-21 related to induced traffic, LOS, and VMT analyses.

59-11 The commenter recounts flooding that occurred in Tahoe at the beginning of the year and asserts there would be more and bigger floods. The commenter asserts that stream zones and floodways must be protected and cannot just be put in concrete. See Response to Comments 12-59 and 12-60, which address concerns related to stormwater runoff and flooding. Potential impacts on stream environment zones (SEZs) are assessed in Impact 3.16-2 on pages 3.16-14 through 3.16-18 of the Draft EIR/EIS/EIS. The project would be required to implement Mitigation Measure 3.16-2 to reduce impacts on sensitive habitats, such as SEZs. See also Response to Comments 10-2 and 11-16 that address concerns related to SEZ restoration.

59-12 The commenter offers a solution to put a tower staffed by one person down by Park Avenue for remote control of signals to help traffic flow during crunch time.

All signalized study intersections have been analyzed with optimized signal timing under all study conditions and future-year scenarios. Signal optimization involves implementing signal timing settings that reduce the amount of time pedestrians, bicycles, and vehicles are stopped at a traffic signal based on traffic patterns and flow. Signal optimization ensures approaches are prioritized based on demand, so the US 50 corridor, for example, would receive more green time than side streets. As shown in Table 3.6-22 of the Draft EIR/EIS/EIS, under Alternative A (No Build) Year 2040 Summer Peak conditions, the intersections of Pioneer Trail/US 50 and US 50/ Stateline Avenue are projected to operate at unacceptable LOS per TRPA standards with optimized signal timing. All study intersections with optimized signal timing are projected to operate at acceptable levels of service with Alternatives B or D in place Under Year 2040 Summer Peak conditions.

The commenter states that existing access to Van Sickle Bi-State Park is adequate and that crossing a four-lane highway would be more difficult than what exists now.

See Response to Comment 12-10.

The commenter suggests closing the ends of local streets and to give Google a mitigation fee to take the route off their maps to end cut-through traffic.

The cut-through roads are currently owned by the City of South Lake Tahoe and are subject to their laws and regulations. Closing a street may be possible with approval of the City of South Lake Tahoe, so long as it meets city regulations, such as fire codes. Since the roads are public, Google is allowed to route directions on them.

The commenter states that with the project, vehicles would use Pine Boulevard as an alternate route to avoid the tourist core.

See Response to Comments 12-17 and 24-4.

- 59-13 The commenter expresses appreciation for the field trip and for discussing issues with residents. The commenter expresses support for the project and notes that traffic on the street is a city problem, but the city has not addressed the issue. The commenter expresses support for the project; it does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during project review.
- 59-14 The commenter notes concern for impacts to the local community, which includes a low-income population with not as much experience, and recognizes the importance of ensuring replacement housing is constructed. The commenter suggests looking into accommodations that could further increase the amount of affordable housing for the low-income population. As noted in Table 3.4-7 on page 3.4-12 of the Draft EIR/EIS/EIS, buildout of all three mixed-use development sites, after taking into consideration replacement housing needs, would result in a net increase in 139 to 146 housing units. The type of housing these units could serve as (e.g., affordable, workforce, or market rate) has not yet been determined; however, these housing units could provide an opportunity to be used for additional affordable housing. A private developer that partners with TTD to develop any of the mixed-use sites would determine the type of housing. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.

## Letters Received after the Close of the Comment Period

07/06/2017 10:41 FAX

001

Letter  
60



Tahoe Transportation  
DISTRICT

US50/South Shore  
Community Revitalization Project

COMMENTS

Regarding the

Public Draft EIR/EIS/EIS

Please hand in comments during the meeting, mail them (address on back), fax them to 775-588-0917, or send an email. Those submitting comments electronically should provide them by email in either Microsoft Word format or as a Portable Document Format (PDF) to [info@tahoe transportation.org](mailto:info@tahoe transportation.org). Please include "US50/South Shore Community Revitalization Project Comment" in the email subject line.

Name: Scott Cook  
 Organization (if any): Tahoe meadows Homeowners Ass.  
 Address (optional): 3996 meadow Rd.  
 City, State, Zip: So Lake Tahoe CA 96150  
 E-mail: ScottC46@yahoo.com

The Tahoe Transportation District (TTD) and Tahoe Regional Planning Agency (TRPA) invite you to provide comments you have on the US50/South Shore Community Revitalization Project. To submit comments, please fold this page in half, tape closed, affix postage and place in the mail to Russ Nygaard at the address on the reverse. Written comments should be sent at the earliest possible date, but no later than 5:00 p.m. on July 7, 2017. Thank you for your comments

Comments: The EIR/EIS does not address the intersection of Lake Road and Highway 50. In fact, the proposal makes an extremely dangerous situation by eliminating the middle turn lane on Lake Road. To feed by an area of 96 homes. During the summer months and peak winter times have from 2-4 vehicles each (in some cases more).

60-1

Also, the proposal shows that Lodge Road is to be blocked during construction. Lodge road is an emergency exit for the people of Tahoe meadows. With the prevailing winds from west to east, should a fire break out, Lodge Road could be the only exit for several hundred people. Blocking Lodge Road is an extremely unsafe condition.

60-2



Tahoe Transportation  
DISTRICT

US50/South Shore  
Community Revitalization Project

COMMENTS

Regarding the

Public Draft EIR/EIS/EIS

Please hand in comments during the meeting, mail them (address on back), fax them to 775-588-0917, or send an email. Those submitting comments electronically should provide them by email in either Microsoft Word format or as a Portable Document Format (PDF) to [info@tahoetransportation.org](mailto:info@tahoetransportation.org). Please include "US50/South Shore Community Revitalization Project Comment" in the email subject line.

Name: Scott Cook

Organization (if any): \_\_\_\_\_

Address (optional): 3776 Meadow Road

City, State, Zip: So Lake Tahoe CA 96150

E-mail: scottc46@yahoo.com

The Tahoe Transportation District (TTD) and Tahoe Regional Planning Agency (TRPA) invite you to provide comments you have on the US50/South Shore Community Revitalization Project. To submit comments, please fold this page in half, tape closed, affix postage and place in the mail to Russ Nygaard at the address on the reverse. Written comments should be sent at the earliest possible date, but no later than 5:00 p.m. on July 7, 2017. Thank you for your comments

Comments: The proposed does not address the intersection of  
Highway 50 and Midway. Midway should be blocked.  
I have lived here for 35 years and never seen anyone make  
a right turn from midway. It is used exclusively as a short cut  
for people not wanting to go through the intersection of  
Primm Trail + Highway 50.  
Allowing left turns from Midway is an unnecessary  
traffic hazard.

60-3

Letter  
60

Scott Cook  
July 6, 2017

- 60-1 The commenter asserts that the Draft EIR/EIS/EIS does not address the Lake Road/US 50 intersection and that eliminating the middle turn lane would result in a dangerous situation. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 60-2 The commenter asserts that the proposal shows Lodge Road, an emergency exit, being blocked during construction, which would be unsafe in the event of the need for evacuation during a fire. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

- 60-3 The commenter asserts the Draft EIR/EIS/EIS does not address the Midway Road/US 50 intersection, which should be blocked. The commenter asserts that allowing left turns from Midway Road is an unnecessary traffic hazard.

Based on the changes to the project described in Master Response 2, “Effects on Access Tahoe Meadows Historic District,” the dedicated left-turn lane would remain, allowing left turns from Midway Road onto US 50. Additional alternatives that were considered during the initial planning for the project, but ultimately dismissed from further analysis, included a one-way alternative that moved the western eastbound/westbound US 50 split west to the US 50/Midway Road intersection (see page 2-48 of the Draft EIR/EIS/EIS). Implementation of the project does not preclude the City of South Lake Tahoe from making circulation changes to Midway Road at US 50 in the future.

**Jessica Mitchell**

**Letter  
61**

**From:** Robert Miroyan <rlmiroyan@aol.com>  
**Sent:** Thursday, June 29, 2017 12:05 PM  
**To:** info@tahoetransportation.org  
**Subject:** Comments on the recent EIR - relating to Tahoe Meadows.

Dear Committee,

We have been home owners in the Tahoe Meadows area for over 45 years, we have followed the proposed Loop Road very carefully.

We want you to know that we strongly support maintaining the left in left our access to Tahoe Meadows.

We further strongly support keeping the Linear Park in its current safe configuration, do not narrow it as it will create traffic and a new set of safety issues.

We thank you,

Bob Miroyan  
 Tahoe Meadows Homeowner

61-1

**Letter  
61**

**Bob Miroyan**  
 June 29, 2017

- 61-1 The commenter expresses support for maintaining the left-in/left-out middle lane at the entrance to Tahoe Meadows and for maintaining the Linear Park in its current configuration. See Master Response 2, “Effects on Access to Tahoe Meadows Historic District.”



**Jessica Mitchell****Letter  
62**

**From:** Phillip Nico <phillip.nico@gmail.com>  
**Sent:** Thursday, July 06, 2017 12:56 PM  
**To:** info@tahoetransportation.org  
**Subject:** Phillip Nico-Comments on the US 50 Relocation (Loop Road) Project

Good afternoon,

As part of a Tahoe Meadows family I am writing to express my concern about options B, C, and D of the proposed project. In particular, I am concerned about access to and from Tahoe Meadows.

In general, I think the project looks like an improvement, but I fear that the narrowing of the linear park at Hwy 50 and Lake Rd. will create dangerous backups onto Hwy 50 as cars stop to enter the gate code. This point was driven home last week when I got caught behind two other cars and had to wait, anxiously, hanging out into the roadway while they operated the gate.

This was the first time I've ever been caught behind two cars there, but the proposed new distance of 14 feet from fence to curb would be even less space than I had then and make this a regular occurrence.

I am also concerned about the elimination of egress options at Lodge Rd. As a resident of that corner of the Meadows I've always regarded that gate as an option for escape in an emergency (fire) or to allow access for emergency vehicles. Of far lesser importance, it also aids the occasional delivery vehicle that ventures down Cedar/Lodge without a plan for turning around.

-PLN

62-1

62-2

**Letter  
62**

**Phillip Nico**  
 July 6, 2017

- 62-1 The commenter notes his background as a member of the Tahoe Meadows family and expresses concern about access to Tahoe Meadows and narrowing the Linear Park. The commenter notes his experience with having to wait in US 50 behind two cars stopped at the entrance. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."
- 62-2 The commenter expresses concern about the elimination of an access point at Lodge Road for emergency evacuation and for emergency vehicles or for delivery drivers. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."

**Jessica Mitchell****Letter  
63**

**From:** psnico@gmail.com  
**Sent:** Friday, July 07, 2017 7:58 PM  
**To:** info@tahoetransportation.org  
**Subject:** Comments on US 50/South Shore Community Revitalization Project DRAFT EIR/EIS/EIS

Whom it May Concern,

I wish to express my concerns about the US 50/South Shore Community Revitalization Project.

**1. Realignment of the Linear Park creates a traffic impact at the entrance to Tahoe Meadows Historic District.**

The proposal to move the linear park closer to the Tahoe Meadows fence will narrow the driveway for cars to turn into Tahoe meadows so that traffic will need to slow or stop for cars to be able to turn into Tahoe Meadows Historic District. This will block pedestrians and cars, increasing the risk of potential conflict between cars, bicyclists, and pedestrians,. This is in direct conflict with the one of the stated purposes of this project that is to "improve vehicle, pedestrian, and bicycle safety." This impact would be easily avoided by maintaining the current alignment of the linear park.

63-1

**2. Uninterrupted emergency access on Lodge Road must be maintained.** It is essential that emergency vehicle access via Lodge Road be maintained. This is consistent with the purpose of this project to "improve safety for residents, pedestrians, and bicyclists in local neighborhoods". Though the EIR/EIS indicates that "the emergency access to Tahoe Meadows on Lodge Road and access to the Holiday Inn Express would be maintained" the development of Site 1 in alternatives B and C blocks the connection between Lodge Road and the street. It is unclear whether alternative D maintains connection between Lodge Road and the street.

63-2

**3. Limiting left-turn access to Tahoe Meadows Historic District would also create a traffic impact.** Limiting left-turns across the existing highway 50 will make access to Tahoe Meadows Historic District difficult. Thus, it is important that, if left-turn access is limited, one of the proposed left-turn pockets provide access to a turn into and out of the Tahoe Meadows main gate at Lake Road and Highway 50.

63-3

Sincerely,

Peter Nico  
 3960 Cedar Rd.

**Letter  
63**

**Peter Nico**  
 July 7, 2017

- |      |  |
|------|--|
| 63-1 | The commenter expresses concern that realignment of the Linear Park would create a traffic impact and safety impact for cars, bicyclists, and pedestrians. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."  |
| 63-2 | The commenter asserts that uninterrupted emergency access on Lodge Road should be maintained and that development of mixed-use development Site 1 for Alternatives B and C would block the connection between Lodge Road and the street. The commenter also asserts that it is unclear whether Alternative D maintains connections between Lodge Road and the street. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District." |
| 63-3 | The commenter asserts that limiting left-turn access to Tahoe Meadows would create a traffic impact. See Master Response 2, "Effects on Access to Tahoe Meadows Historic District."  |

**Jessica Mitchell****Letter  
64**

**From:** Maureen Richardson <golddance5@yahoo.com>  
**Sent:** Saturday, July 08, 2017 6:39 AM  
**To:** suggestions@us50revitalization.org  
**Subject:** Public comment

To whom it may concern:

I am against this project.

Traffic through casino corridor has to be all or none. Why keep one lane of traffic through a pedestrian area? Does not make sense.

This project benefits a few.

Housing displacement. Where do people go? NIMBY attitude of recent Zephyr Cove housing project proves that existing residential communities will prevent development of housing that is low income.

Vote no. This is a Trojan horse to subsidize a few at the expense of many.

Maureen Richardson  
 Home owner South Lake Tahoe

Sent from my iPhone

64-1

**Letter  
64**

**Maureen Richardson**  
 July 8, 2017

64-1

The commenter expresses opposition for the project. The commenter asks why there would be only one lane of traffic through a pedestrian area and where are the people displaced by housing supposed to go. The commenter asserts that existing residential communities will prevent development of housing that is low income. The commenter asserts the project will subsidize a few at the expense of many. As described on page 2-14 of the Draft EIR/EIS/EIS, Alternatives B and D would convert US 50 to a “complete street” through the tourist core in which the existing five-lane roadway would be narrowed down to one lane in each direction with left-turn pockets. The reduced number of vehicle travel lanes would enable pedestrian, bicycle, and transit enhancements. To address the commenter’s concern about low income housing, TTD has committed to constructing an equal number of housing units as replacement for eligible residential units displaced by the project (see pages 2-5 and 2-6 of the Draft EIR/EIS/EIS). The replacement housing would include deed-restricted affordable housing to replace those displaced by the project. Additionally, the acquisition process of properties displaced by the project, including those properties potentially displaced by the mixed-use development, would be conducted in a manner consistent with the requirements of the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (“Uniform Act”). All eligible residents directly affected by the project would be relocated fairly and equitably in accordance with the federal Uniform Act. The comment offers no specific information or evidence that the analysis presented in the environmental document is inadequate; therefore, no further response can be provided.

ALFRED C. SCHMIDT  
720 HAYNE ROAD  
HILLSBOROUGH, CALIF. 94010

Letter  
65

July 9, 2017

RECEIVED  
JUL 21 2017

To:

Federal Highway Administration,  
Tahoe Transportation District,  
Tahoe Regional Planning Agency,

Gentlemen,

I am writing this letter to you as a long time property owner in Tahoe Meadows, going back before there were any Casinos at the Nevada State Line.

I believe that the real answer to the Highway 50 traffic problem is to change the business plans for the Casinos; to convert them into vacation hotels; and to not permit any more large hotels to be built in this location.

Lake Tahoe is a gem of the Sierras, comparable to Yosemite and Yellowstone National Parks. It is the summer home of the Washoe Indians. It needs to be treated with respect, and used for only those activities that are not available elsewhere. There is no shortage of gambling facilities for those who must have them, and there is no need for them at Lake Tahoe when they can be located elsewhere.

If I were you I would stop looking at highway details and concentrate on changing the business plans for the Casinos which are the cause of the problem.

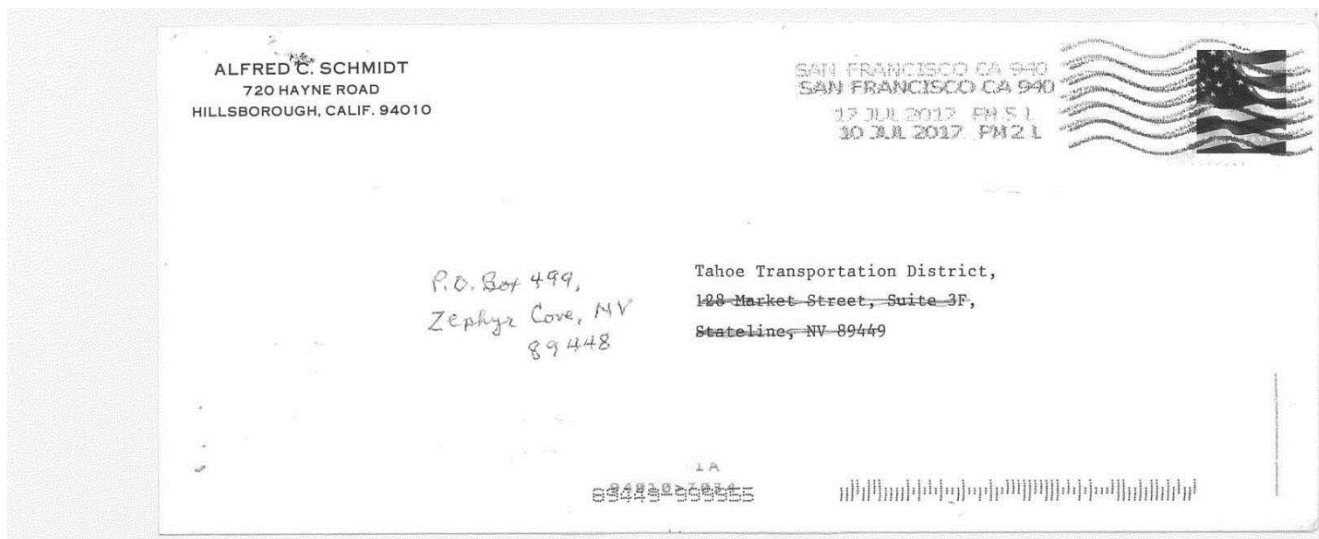
Very truly yours,

*Alfred C. Schmidt*

Alfred C. Schmidt

cc: Ron Yank & Cathi Sweeney

65-1



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**Letter  
65****Alfred C. Schmidt**  
July 9, 2017

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- 65-1      The commenter provides background as a long-time property owner in Tahoe Meadows. The commenter suggests that the answer to the US 50 traffic problem is in changing the business plans for the casinos and to not permit anymore large hotels in this area. The commenter compares Lake Tahoe to Yosemite and Yellowstone National Parks, notes it is the summer home of the Washoe tribe, and it needs to be treated with respect. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the EIR/EIS/EIS. The comment is noted for consideration during project review.

**XAVIER BECERRA**  
*Attorney General*

*State of California*  
**DEPARTMENT OF JUSTICE**



1300 I STREET, SUITE 125  
P.O. BOX 944255  
SACRAMENTO, CA 94244-2550

Public: (916) 445-9555  
Telephone: (916) 210-7797  
Facsimile: (916) 327-2319  
E-Mail: Nicole.Rinke@doj.ca.gov

August 15, 2017

Russ Nygaard, Transportation Capital Program Manager  
Tahoe Transportation District  
P.O. Box 499  
Zephyr Cove, NV 89449  
*Via email – rnygaard@tahoetransportation.org*

Shannon Friedman, Senior Planner  
Tahoe Regional Planning Agency  
P.O. Box 5310  
Stateline, NV 89449  
*Via email – sfriedman@trpa.org*

**Re: US 50/South Shore Community Revitalization Project Draft Environmental Impact Report/Environmental Impact Statement**

Dear Mr. Nygaard and Ms. Friedman,

The California Attorney General's Office has reviewed the draft environmental impact report/environmental impact statement (EIR/EIS)<sup>1</sup> for the US 50/South Shore Community Revitalization Project (the Project) and respectfully submits the following comments. The Attorney General submits these comments pursuant to his independent authority under the California Constitution, common law, and statutes to represent the public interest. Along with other State agencies, the Attorney General has the power to protect the natural resources of the State from pollution, impairment, or destruction. (See Cal. Const. Art. V, sec. 13; Gov. Code §§, 12511, 12600-12; *D'Amico v. Board of Medical Examiners* (1974) 11 Cal.3d 1, 14-15.) These comments are made on behalf of the Attorney General and not on behalf of any other California agency or office. We recognize that the comment period on the draft EIR/EIS has closed, but request that you consider our comments and address them prior to issuing or certifying the final EIR/EIS for the Project.

66-1

<sup>1</sup> The EIR/EIS is a joint environmental impact report/environmental impact statement prepared pursuant to the requirements of the California Environmental Quality Act, the National Environmental Policy Act, and the Tahoe Regional Planning Agency's requirements for environmental review.

August 15, 2017

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The California Attorney General has a longstanding interest in the protection of Lake Tahoe as a state and national treasure. The Attorney General's interest dates back over four decades (see, e.g., *California ex rel. Younger v. Tahoe Regional Planning Agency* (9th Cir 1975) 516 F.2d 215) and is as recent as our involvement in the 2016 Martis Valley West and Squaw Valley Specific Plan Updates, approved by Placer County, and the Tahoe Regional Planning Agency's (TRPA) current planning efforts regarding the shoreline plan amendments.

Our major concern with the EIR/EIS is that it does not analyze a reasonable range of alternatives. The Project seeks to revitalize business in South Lake Tahoe and address congestion that occurs along Highway 50 in the South Shore/Stateline tourist core area. The preferred alternative, Alternative B, proposes to construct a new 4-lane highway through the Rocky Point neighborhood (Rocky Point), a predominately low income, Hispanic, and Asian neighborhood,<sup>2</sup> and along the back/mountainside of the existing developed tourist core area, adjacent to and encroaching into the Van Sickle Bi-state Park. The preferred alternative would essentially formalize and enlarge a cut-through route that motorists presently take through the Rocky Point neighborhood to avoid traffic on Highway 50. While Rocky Point is, therefore, already experiencing impacts, the preferred alternative will have new and long-lasting significant adverse impacts on the Rocky Point neighborhood and its residents. The preferred alternative will physically split the community, displacing residents, and leaving the ones left behind facing a disproportionately high and adverse set of scenic, noise, and community cohesion impacts. The preferred alternative would also be 0.4 miles longer than the existing section of Highway 50, yet the project EIR/EIS does not quantify the increased vehicle miles travelled (VMT) or greenhouse gas (GHG) emissions that would result from operation of the Project.

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We object to the Tahoe Transportation District (TTD) and the Tahoe Regional Planning Agency (TRPA) moving forward with the Project unless they give meaningful consideration to alternatives that do not come at the expense of the residents of Rocky Point. Too often, lower income and minority communities disproportionality bear the adverse impacts that may be associated with new development or redevelopment projects and unfortunately, that would be the case with the majority of alternatives analyzed in the Project EIR/EIS. All but one of the build alternatives analyzed in the EIR/EIS propose a similar realignment of Highway 50 through Rocky Point with correspondingly similar impacts to the displacement of residents and the remaining community, and potential impacts to VMT and GHG emissions. The EIR/EIS should

<sup>2</sup> It is important to note that in characterizing the demographics of Rocky Point, the EIR/EIS primarily utilizes a study area that is much broader than Rocky Point and not necessarily homogeneous with its demographics. (See Highway 50 EIR/EIS Exhibit 3.4-1). For example, the EIR/EIS states that minority populations compose over half (54.8%) of the residents of the broader study area (Highway 50 EIR/EIS 3.4-7); whereas another study conducted specifically of the relocation area found that of the residents that will be relocated, approximately 73% are bi-lingual or speak a primary language at home other than English. (Tahoe Transportation District, 2012 Relocation Study for the US 50/South Shore Community Revitalization Project, p. 13.)



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analyze alternatives that do not route Highway 50 through Rocky Point. Those alternatives could include improvements to the existing highway or a different route.

The fundamental purpose of an EIR is to “inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’” (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.) The EIR/EIS for the Project only analyzes one alternative that does not involve the realignment of Highway 50 through the Rocky Point neighborhood. In addition, the EIR/EIS does not consider the full panoply of mitigation measures that may be available to reduce the Preferred Alternative’s impacts to Rocky Point. The EIR/EIS also does not include an analysis of the Project’s operational impacts on VMT and GHG emissions. The EIR/EIS should be revised to include a broader range of alternatives, an analysis of all of the Project’s potential impacts, and feasible potential mitigation measures that may lessen the Project’s impacts. Absent further analysis, the public and the decision-makers do not have the information necessary to make an informed decision regarding the proposed Project.

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#### A. THE EIR/EIS MUST ANALYZE A REASONABLE RANGE OF ALTERNATIVES.

First and foremost, the EIR/EIS fails to consider a reasonable range of alternatives that could potentially reduce the Project’s impacts on Rocky Point. The EIR/EIS includes four action alternatives, three of which involve a very similar reroute of Highway 50 through Rocky Point with similar corresponding impacts to the neighborhood. CEQA requires that an EIR present a reasonable range of potentially feasible alternatives and discuss mitigation measures that may minimize a project’s significant environmental effects. (Pub. Resources Code, § 21002 [mitigation]; Pub. Resources Code, § 21003 [alternatives]; Cal. Code Regs., tit. 14, §§ 15126.4, 15126.6, subd. (a).) While an EIR need not consider every possible alternative, an EIR will be considered deficient if it omits, without reasonable explanation, analysis of an alternative that would reduce significant impacts and achieve most of the project’s objectives. (*Laurel Heights Improvement Assn. v. Regents of University of California, supra*, at p. 403.) Here, the EIR/EIS is deficient because it has not adequately analyzed alternatives that would use the existing alignment of Highway 50, nor has it analyzed alternative realignments that would route the new highway somewhere other than Rocky Point.

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Out of the four proposed build alternatives, only Alternative E is a non-realignment alternative. Alternative E is a proposed pedestrian skywalk that would span the entire length of the tourist core, a distance of approximately 0.3 miles. The EIR/EIS indicates that “Alternative E would avoid the housing and business displacement and encroachment on Van Sickle State Park associated with the other build alternatives, but would only meet some of the basic project objectives.” (Highway 50 EIR/EIS 2-21.) Although it is not explained as such, Alternative E appears to fall short of project objectives because it would not provide for the addition of bicycle lanes on Highway 50 or development of the potential future residential/commercial sites associated with the replacement housing required for the other alternatives. (Highway 50 EIR/EIS 2-33 to 2-34). In addition, due to the size of the skywalk, the EIR/EIS identifies the scenic impacts from this alternative as significant and unavoidable. Although the shortcomings of this alternative are unfortunate and the scenic impacts concerning, we encourage TRPA and

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TTD to consider the trade off between achieving project objectives and causing significant impacts and, to the extent impacts are unavoidable, thoughtfully consider what sort of impacts are appropriate (e.g., scenic impacts versus the dislocation of residences).

In order to facilitate this balancing, we suggest that the EIR/EIS analyze a modified version of the skywalk, such as a series of smaller pedestrian bridges. The EIR/EIS briefly contemplates such an alternative in the context of mitigation for the scenic impacts of the proposed pedestrian skywalk. Specifically, the EIR/EIS suggests that the design of the skywalk could be modified to reduce its visual mass by converting it to more narrow overhead crossings for pedestrian walking only. (Highway 50 EIR/EIS S-46 to 47.) The document indicates that “this design modification would avoid impacts on the intactness and unity of views from the road, and would reduce or eliminate degradation of the character of the roadway corridor as experienced by motorists.” (Highway 50 EIR/EIS S-46 to 47.) The document, however, concludes, without explanation, that with this modification, Alternative E “is likely to not feasibly meet the project objectives.” (Highway 50 EIR/EIS 3.7-49.)

This conclusory dismissal of a series of smaller pedestrian bridges as mitigation is insufficient to support the conclusion that the scenic impacts of Alternative E are significant and unavoidable. There is no apparent reason why a smaller series of pedestrian bridges would fall any further short of achieving project objectives than the proposed skywalk. The EIR/EIS indicates that Alternative E would improve roadway segment level of service (LOS) and substantially improve LOS at several intersections. A series of smaller pedestrian bridges would do the same. The EIR/EIS also finds that Alternative E would promote walkability through the tourist core, yet avoid the adverse impacts of the preferred alternative on Rocky Point. (Highway 50 EIR, see 3.6-37, and 48.) The same would appear true for a series of smaller pedestrian bridges. It is a logical inconsistency to include the proposed skywalk as an alternative for analysis, while at the same time declining to meaningfully consider a series of smaller pedestrian bridges as mitigation for the scenic impacts of the proposed skywalk or as a stand alone alternative. We request that TRPA and TTD analyze pedestrian bridges as an alternative and again encourage TRPA and TTD to consider whether such an alternative strikes the appropriate balance between achieving project objectives and causing significant and unavoidable impacts.

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In addition, the EIR/EIS should include an analysis of a realignment alternative that does not reroute Highway 50 through Rocky Point. Such an alignment could, for example, reroute the highway on the north side of the existing Highway 50 (“north side realignment”) behind the casinos and through an area that is presently developed with commercial uses, primarily motels and hotels. This alignment would completely avoid the impacts to Rocky Point and would seem just as likely to achieve the Project’s objectives. We recognize that a north side realignment would also displace existing businesses and, to the extent they exist, residences. By suggesting analysis of this alternative, we are not suggesting that this dislocation is preferable or more acceptable, but merely asking that an alternative alignment be analyzed so that the public and the decision-makers have the information necessary to assess the relative merits and consequences of the proposed Project.

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The EIR/EIS includes versions of a north side alignment alternative in its list of “alternatives considered but eliminated from further discussion.” (Highway 50 EIR/EIS 2-46 to 2-47, see also Appendix C [Maps 5, 6, and 7].)<sup>3</sup> The document indicates that these alternatives were eliminated from further consideration because the “constructability and cost impacts outweigh the benefits.” (Highway 50 EIR/EIS 2-46 to 2-47). However, the estimated construction costs seem comparable to those of the preferred alternative. The preferred alternative is estimated to cost between \$70 to \$80 million, while the north side alternatives were estimated to cost between \$90 to \$100 million.<sup>4</sup> (Highway 50 EIR/EIS Appendix C Map 3 [“Triangle Alternative”]; Maps 5, 6, and 7.)<sup>5</sup> The document also states that these alternatives were not considered because they would require construction of a separate frontage road and driveway consolidations (Highway 50 EIR/EIS 2-46 to 2-47), yet it is not obvious why these construction accommodations are any less feasible or acceptable than displacing residents, constructing replacement housing for displaced residences, and causing significant and adverse impacts to the remaining residents of Rocky Point.

Finally, the EIR/EIS indicates that the north side realignment alternatives were not considered because they would “not meet the project objective to create a complete street through the tourist core for all users.” (*Ibid.*) Again, however, it appears that the north side realignments were only contemplated as one-way realignments that would retain the highway status of the existing segment of Highway 50. It is not apparent why, for this realignment on the north side of the existing highway, an alternative was not considered that would, like the preferred alternative, have realigned Highway 50 in its totality, allowing for conversion of the existing highway to a complete street. Given the significant and unavoidable impacts to Rocky Point from all of the realignment alternatives analyzed, the EIR/EIS should be modified to include analysis of a realignment alternative that avoids these impacts. Again, absent this additional analysis the public and the decision-makers do not have the information necessary to make an informed decision about the Project.

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<sup>3</sup> The EIR/EIS identifies alternatives considered but eliminated from further discussion in chapter 2 of the EIR/EIS and also, in more detail, in Appendix C. Chapter 2 only seems to describe two north side realignment alternatives, while Appendix C includes three. It is not clear why the EIR/EIS does not describe the third north side realignment alternative.

<sup>4</sup> While \$10 million may seem significant, some of the other alternatives considered but eliminated from further discussion for constructability and costs reasons were estimated to cost as much as \$750 to \$800 million. (Highway 50 EIR/EIS Appendix C, Map 10; see also Map 11 [\$300 to \$350 million].) Further, several alternatives were estimated to cost between \$100 and \$135 million and these alternatives were not rejected on the basis of cost. (Highway 50 EIR/EIS Appendix C, Maps 4, 12, 13, and 14.)

<sup>5</sup> It is not clear that the “triangle alternative” is identical to the preferred alternative, but the Regional Transportation Plan (RTP) also estimates that the Project will cost between \$75 to \$82 million. (2012 RTP, p. 133 and 2017 RTP, Appendix B, p. 2.)

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**B. THE EIR SHOULD CONSIDER ADDITIONAL POTENTIAL MITIGATION MEASURES THAT MAY ADDRESS THE ENVIRONMENTAL JUSTICE IMPACTS TO ROCKY POINT.**

The EIR/EIS acknowledges that the Project will have significant adverse noise, community cohesion, and scenic impacts on Rocky Point. While the Rocky Point neighborhood is already experiencing impacts related to cut-through traffic that is occurring as a result of traffic on the existing Highway 50, the Project will essentially formalize and enlarge this cut-through route, permanently and more severely impacting the neighborhood. The EIR does not, but must, consider all feasible mitigation measures to reduce these impacts.

**Noise** – The preferred alternative (as well as the other realignment alternatives) involves the rerouting of Highway 50 through Rocky Point, which will create significant and unavoidable noise impacts in the neighborhood. Some of the mitigation measures proposed are to build 1,000 to 1,200 foot-long sound barriers, reduce vehicle speeds, offer increased noise insulation to exterior walls on properties that exceed certain thresholds, or to acquire properties where the noise level would exceed TRPA and Caltrans standards. (Highway 50 EIR/EIS 3.15-65.) While acknowledging these potential mitigation measures, the EIR/EIS, without further discussion, indicates that these measures may not be feasible and, thus, states that these impacts remain significant and unavoidable, presumably because the mitigation measures will not be required as part of the Project. (Highway 50 EIR/EIS 3.15-66.)

**Community Cohesion** – The EIR/EIS deems the Rocky Point neighborhood as currently having moderate community cohesion. (Highway 50 EIR/EIS 3.4-17.) With the preferred alternative, Highway 50 would bisect Rocky Point. “The community would be split in two, and residents southwest of the highway would be physically separated from the adjacent commercial properties and downtown area.” (Highway 50 EIR/EIS 3.4-18.) The EIR/EIS discusses the potential of constructing a raised pedestrian walkway to provide access across the realigned US 50, but indicates that it was dismissed because the long approaches that it would require to comply with the Americans with Disabilities Act would “not reduce trip lengths for pedestrians.” (US 50 EIR/EIS 3.4-36.) Without discussing any other potential mitigation measures, the EIR/EIS identifies the physical division of Rocky Point as a significant and unavoidable impact.

**Scenic** – The new portion of Highway 50 that would be constructed under the preferred alternative will cause significant and unavoidable scenic impacts within Rocky Point. The proposed highway would include a noise barrier, 6 to 8 feet tall, adjacent to the highway for its full length through the neighborhood. (Highway 50 EIR/EIS 3.7-28.) “Residents’ existing views within the neighborhood of homes, open yards, and local streets would be replaced with a new continuous, structural border or edge of the neighborhood with views of the berm and noise wall mass.” (Highway 50 EIR/EIS 3.7-29.) The EIR/EIS considers this a significant and unavoidable impact. (Highway 50 EIR/EIS 3.7-17.)<sup>6</sup>

<sup>6</sup> In addition, along Lake Parkway, outside of Rocky Point, “the realigned US 50 would appear two to three times wider and much more heavily traveled.” (Highway 50 EIR/EIS 3.7- (continued...))

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Although the EIR/EIS recognizes that the Project will have these significant and unavoidable impacts to Rocky Point, it does not discuss potential mitigation measures that may avoid or minimize the impacts. An EIR should include a discussion of potential mitigation measures unless they are patently infeasible. (See e.g., *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 360; Pub. Resources Code, § 21002; Cal. Code Regs., tit. 14, § 15126.4.) Here, the EIR/EIS for the Project fails, without adequate explanation, to consider potential mitigation measures that could reduce the significant and unavoidable noise, community cohesion, and scenic impacts that will occur in Rocky Point.

In particular, it would appear that TTD could acquire additional parcels – beyond those that would be necessary for the new right of way alignment – as buffer parcels that could be left vacant to create more distance between the remaining residences and the new highway. This would potentially reduce the noise and scenic impacts within the community. TTD could also acquire parcels that are not directly needed for the new right of way, but would be most severely impacted by the new highway in terms of being cut off from the remaining neighborhood or the commercial core area. The acquisition could be mandatory for all parcels that would be most severely impacted or could be a voluntary program that residents could opt into.

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In addition, for noise impacts within the community, the EIR/EIS identifies potential mitigation measures but declines to determine whether they are feasible and declines to mandate their implementation. At a minimum, TTD and TRPA should determine whether the identified measures are feasible and, for those that are, require implementation. Further, for community cohesion, TTD could install a signalized intersection to service the neighborhood. As proposed, the new Highway 50 would have signalized intersections at Heavenly Village Way and Harrah's Drive. (Highway 50 EIR/EIS 3.7-27.) Thus, there is no apparent reason why a signalized intersection could not be included to serve pedestrians within Rocky Point and potentially reduce the community cohesion impacts of the Project.

**C. THE PROJECT SHOULD PROVIDE PROXIMAL REPLACEMENT HOUSING FOR THE ROCKY POINT RESIDENTS THAT THE PROJECT WILL DISPLACE.**

In addition to impacts to the Rocky Point neighborhood as a whole, the preferred alternative would result in the displacement of 76 single or multiple family housing units. (Highway 50 EIR/EIS Table 2-2). These residents will be provided relocation assistance pursuant to the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Act). (Highway 50 EIR/EIS 2-5.) The Act requires that TTD provide displaced residents with financial assistance for relocation. (Highway 50 EIR/EIS 3.4-42.) In addition, TTD proposes to construct replacement housing equal to or greater than the number of units displaced. The replacement housing would include deed restricted low-income and moderate-

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28.) The highway will also involve large retaining walls to contain new cut slopes along the east side of the road. (*Ibid.*) The EIR does not identify these as significant scenic impacts.

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income housing (equal to the relative number being replaced) and would be built before the existing residential properties are condemned. (Highway 50 EIR/EIS 2-5.)

Although it appears that TTD, as part of the Project, will replace all of the condemned housing units, there is some language in the EIR/EIS that suggests this to be contingent upon the acquisition of certain development rights. (Highway 50 EIR/EIS 2-5 [“TTD will replace multi-family residential units, where they are able to acquire the owner’s development right as part of the acquisition.”].) This commitment should be clarified, and full replacement should be guaranteed as part of the Project.

In addition, the replacement housing should be constructed in close proximity to the existing neighborhood. TTD proposes to construct the replacement housing at mixed use development sites within the project area. (Highway 50 EIR/EIS 2-5 to 2-6.) The redevelopment of high-density mixed use in the tourist core area would be consistent with TRPA’s 2012 Regional Plan, as well as the Project’s goals of encouraging a more pedestrian oriented community. For a number of reasons, however, the EIR/EIS indicates that acquisition of and construction at these sites is not guaranteed. If TTD is unable to construct replacement housing within the tourist core area, the EIR/EIS indicates that the replacement housing may be constructed at another location in the South Shore area. (Highway 50 EIR/EIS 3.4-45.) Some of the alternative locations include locations at the “Y” intersection in Tahoe, on the other end of town. (Highway 50 EIR/EIS 3.4-40.) This location would displace residents approximately six miles from their original location, a distance that during high tourist season can take a significant amount of time, disproportionate to the distance, to travel. The EIR/EIS acknowledges that most of the residents within the Rocky Point neighborhood work in the nearby tourist core area and the surrounding commercial area. (Highway 50 EIR/EIS 3.4-18.) It is not reasonable to expect these residents to relocate to the “Y” intersection. TTD should construct the replacement housing within greater proximity to the existing neighborhood and the tourist core area where most of the Rocky Point residents work. Keeping these residents close to their place of work will not only better serve the residents but will also better serve the goals of TRPA, TTD, and the Project to promote pedestrian-transit oriented development.

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Finally, replacement housing needs to be provided for all of the residences that will be displaced. In addition to the single and multi-family homes that the Project will displace, the preferred alternative will displace 114 motel units that are largely occupied by low income residents as housing. Although the total number is unknown, it is confirmed that at least 44 of these motel units are being used as residences. (Highway 50 EIR/EIS 3.4-43.)<sup>7</sup> The EIR/EIS

<sup>7</sup> The City of South Lake Tahoe recently adopted a single room occupancy (SRO) ordinance to provide incentives to owners of motels to improve units that are being used as residential housing. Pursuant to the SRO ordinance, motel owners that agree to make certain improvements and obtain a permit from the City are exempt from the City’s transient occupancy tax for those units. (Highway 50 EIR/EIS 3.4-39.) Applications have been submitted for 44 of the 114 units that will be condemned for the Project. Because the program is optional, we cannot be certain whether the other 70 units are also being used as residential units.

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does not conclude that the loss of these units requires the construction of replacement affordable housing, nor is relocation assistance being provided for the individuals residing in these motel units. (Highway 50 EIR/EIS 2-24.) Under TRPA's criteria for environmental review, a project has a significant impact if it results in the temporary or permanent displacement of residents; affects existing housing or creates a demand for additional housing; or results in the loss of housing for lower-income or very-low-income households. (Highway 50 EIR/EIS 3.4-41.) Pursuant to this standard, the loss of these residential motel units is a significant impact and TTD must construct replacement housing for these units.

The EIR/EIS suggests, in part, that it need not consider the loss of these units as a loss of residential units because TRPA recognizes them as tourist accommodation units, not residential units. TRPA's classification of these units for regulatory purposes should not be used to ignore the actual known use of these units, nor to ignore the impact their removal will have on the residents or on the supply of low income housing in the area. (Cf., *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1451 [the proper baseline is the existing condition of the site, even if that condition may be the result of illegal activity]; *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1233 [the proper baseline for assessing impacts to habitat was the existing condition of the site, even if the condition had been degraded by illegal activity].) TTD should provide replacement housing near the existing neighborhood/tourist core area for these units, as well as the other 76 residences that will be displaced by the Project. This replacement housing is necessary to insure that the loss of housing is fully mitigated and that it is mitigated in a manner consistent with the larger goals of the Project and the region.

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**D. THE EIR SHOULD INCLUDE A MORE COMPLETE ANALYSIS OF THE PROJECT'S POTENTIAL IMPACT ON VMT AND GHG EMISSIONS/CLIMATE CHANGE.**

TRPA has adopted regional environmental standards or "thresholds" to achieve environmental goals in the basin. Projects proposed within the basin must comply with these thresholds. The thresholds include standards for VMT. The VMT threshold is 10% below 1981 levels, or 2,067,600 peak daily basinwide VMT.<sup>8</sup> TRPA uses VMT as a proxy for capturing the air and water quality impacts associated with vehicle use. As the EIR/EIS itself explains, "[e]nvironmental consequences are indirectly related to a change in the volume or efficiency of VMT. Motor vehicle travel involves air pollutant emissions, greenhouse gas emissions, and noise generation; therefore, VMT increases result in indirect environmental impacts related to air pollutant, GHG, and noise emissions." (Highway 50 EIR/EIS 3.6-51.) VMT is also an important metric for achieving the bi-state Compact's directive to reduce reliance on automobiles within the basin. In addition, beyond the basin, VMT reductions are an important means of achieving the state's GHG reduction goals. (See e.g., California Air Resources Board Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, June

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<sup>8</sup> According to the latest threshold report, the resulting value is 2,030,938 daily VMT. (TRPA 2015 Threshold Evaluation Report, 3-6.)



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2017, page 9 [“While most of the GHG reductions from the transportation sector will come from technologies and low carbon fuels, reduction in the growth of VMT is also necessary.”].)

The EIR/EIS for the Project concludes that the preferred alternative’s impact on VMT will be beneficial. However, the EIR/EIS does not include an analysis of the Project’s operational impact on VMT, but rather relies on the environmental analysis that was completed for the 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP). (Highway 50 EIR/EIS 3.6-51.) The 2012 RTP included the Highway 50 Revitalization Project as well as about a dozen other transportation projects, many of which are aspirational and have not yet been, and may never be, constructed.<sup>9</sup> The EIR for the 2012 RTP concluded that, as a whole, the plan would have a net beneficial effect by reducing regional per capita VMT. (2012 RTP EIR/EIS 3.3-49.) Relying on this conclusion, the EIR/EIS for the Project reasons that because the Project was included within the 2012 RTP, the regional VMT quantitative projections prepared for that plan are applicable to this Project and a separate quantitative analysis is not needed. (Highway 50 EIS/EIR 3.6-51.) The EIR/EIS carries this same logic over to the GHG analysis, and relies on it to also forego analysis of the Project’s operational impacts on GHG emissions and climate change.

This approach is incorrect. The environmental document prepared for the 2012 RTP was a programmatic EIR. A project EIR can only rely on a programmatic EIR to avoid analyzing impacts if the Project does not have any new effects not analyzed in the programmatic EIR. (Cal. Code Regs., tit. 14, § 15168, subd. (c).) Here, the EIR/EIS for the Project indicates that the new segment of Highway 50 will be 0.4 miles longer than the existing segment of Highway 50, and will therefore have a “small localized increase in VMT.” (Highway 50 EIR 3.6-51.) Thus, the Project has an impact (an increase in VMT and presumably associated GHG emissions) that was not analyzed in the programmatic EIR for the 2012 RTP. The EIR for the 2012 RTP included a cumulative analysis of all 12 projects, but did not include an analysis of the VMT or GHG impacts of individual projects within the plan. Therefore, the Project’s impact on VMT and GHG emissions must be more particularly analyzed in the Project EIR/EIS.

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Notably, SB 375, adopted in 2008, specifically provides for streamlining project level reviews subsequent to a program level review of an adopted RTP/Sustainable Communities Strategy for certain categories of projects that promote compact, transit-based development. Specifically, SB 375 provides streamlined review for “mixed use residential projects” and “transit priority projects” that are consistent with a Sustainable Communities Strategy. (Pub. Resources Code, § 21555, et seq.; Pub. Resources Code, § 21159.28.) Pursuant to the streamlined process, for example, a transit priority project that is consistent with an approved Sustainable Communities Strategy is not required to consider the project specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network. (Pub. Resources Code, §§ 21155.2, subd. (b); 21159.28, subd. (b).) The Highway 50 Project

<sup>9</sup> For example, the 2012 RTP includes implementation of a ferry system across the lake, with an estimated cost of approximately \$40 million. (2012 RTP G-12.)

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does not meet the requirements of a “transit priority project,” yet the EIR/EIS is, in effect, trying to use the streamlined process the Legislature specifically created for this class of projects.

Some of the projects within the 2012 RTP are ambitious and not guaranteed to be completed. Thus, the program level conclusion that the 2012 RTP will have a net beneficial impact on VMT and GHG emissions cannot be relied upon to forego analysis of the Project’s operational impacts on VMT and GHG emissions/climate change. Suppose that this Project is completed, but other bicycle and pedestrian related projects envisioned in the RTP are not completed. This would mean that the Project’s increase in VMT and associated GHG emissions within the basin would not be offset by these other projects. It is improper to declare the Project’s impact on VMT or GHG emissions as beneficial based on an aspirational collection of projects that may never be completed. (See, *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 952 [an EIR must focus on the project’s impacts to the environment, not its impacts on hypothetical situations]; *Woodward Park Homeowners Association v. City of Fresno* (2007) 150 Cal.App.4th 683, 707 [an EIR that limits its analysis to a comparison with future development allowed by existing zoning and other land use plans is legally inadequate].) The Legislature, via SB 375, has authorized agencies to take that risk, but only for mixed use residential and transit priority projects that meet specified criteria.

Reliance on the 2012 RTP to conclude without analysis that the Project’s impact on VMT is beneficial is also inadequate because the 2012 RTP did not apply TRPA’s threshold standard for VMT. The 2012 RTP looked only at per capita VMT. (See 2012 RTP EIR/EIS, 3.3-3 [“Because achievement of the VMT threshold standard relies on both land use and transportation decisions, and TMPO [Tahoe Metropolitan Planning Organization] does not have authority over land use decisions, the issue of compliance with this standard is addressed in the RPU [Regional Plan Update] EIS.”].) The TRPA threshold is a basinwide limit on VMT that applies to all projects approved within the basin. (See Compact V(g) [requiring that TRPA prescribe findings for project approval that “shall insure that the project under review will not adversely affect implementation of the regional plan and will not cause the adopted environmental threshold carrying capacities of the region to be exceeded.”]; TRPA Code of Ordinances 4.4.1(B) [requiring for project approval that TRPA find that the project will not cause the environmental threshold carrying capacities to be exceeded].)<sup>10</sup> Absent an analysis of the Project’s impact on basinwide VMT, TRPA will not be able to make the required findings to approve the Project.<sup>11</sup>

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<sup>10</sup> It is troubling that the 2012 RTP forecasts that the threshold standard for VMT will be exceeded in 2035. (2012 RTP EIR/EIS [estimating 2,131,000 daily VMT for 2035 with the implementation of the RPU/RTP, alternative 3].) The Regional Plan, which includes the RTP, is required by the bi-state Compact to maintain and achieve thresholds. The 2012 Regional Plan Update EIS identified the Plan’s impact on basinwide VMT, but determined that with mitigation it would be less than significant. (2012 Regional Plan Update EIS 3.3-49.) The mitigation measure limits TRPA’s release of new development allocations to every four-years contingent upon a determination that the VMT threshold will not be exceeded in the subsequent four-year period. The environmental document for the 2017 RTP again acknowledges that basinwide VMT is forecasted to be exceeded, but expressly references the Regional Plan’s mitigation

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While the Project EIR/EIS does not include a discussion of the Project's impact on basinwide VMT within the impact's analysis, it does address basinwide VMT in its discussion of traffic methods and assumptions. There the EIR/EIS suggests that the Project's impact on basinwide VMT was not analyzed because the Project is consistent with the Regional Plan Update and "a project that would be consistent with the Regional Plan, would not have an adverse effect on regional VMT." (Highway 50 EIR/EIS 3.6-30.) This rationale ignores the Compact's requirement that TRPA review projects for consistency with both the Regional Plan and adopted thresholds.

This failure to consider the Project's operational impacts on VMT or GHG emissions is particularly concerning since the Project will represent an increase in vehicle capacity in the area. (Highway 50 EIR/EIS 3.6-1.) The existing Highway 50 only has four lanes. With the construction of the preferred alternative there will be six total lanes, plus additional turning lanes, in which one can travel east or west bound through the area.<sup>12</sup> The Governor's Office of Planning and Research (OPR), in working to revise its CEQA Guidelines regarding traffic analyses, has acknowledged that, in most situations, adding new roadway capacity increases vehicle miles travelled. (See OPR's Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, at 1:4 [referencing [http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST\\_Brief\\_InducedTravel\\_CS6\\_v3.pdf](http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf)].)

66-5  
cont

In conclusion, we request that TTD and TRPA revise the Project EIR/EIS to include: (1) alternatives that avoid the impacts to Rocky Point; (2) additional mitigation measures that may reduce the significant and unavoidable impacts within Rocky Point; (3) proximal replacement housing for all dislocated Rocky Point residences, including motel rooms that are being used as residences; and (4) a more particularized analysis of the Project's operational VMT and GHG

66-6

(...continued)

measure to conclude that the impact will be less than significant. (2017 RTP Draft Initial Study/Initial Environmental Checklist 3-61.)


<sup>11</sup> Reliance on the 2012 RTP EIS may also be inadequate because that analysis did not include the new Clear Creek residential development of nearly 400 homes that is being developed just outside of the basin on Highway 50. (See <https://www.tmrrealestate.com/clear-creek-tahoe-mountain-resort-community/>; <http://www.tahodailytribune.com/news/clear-creek-tahoe-closing-on-first-lots/>.)

<sup>12</sup> In addition, the EIR/EIS indicates that the preferred alternative includes the option for converting Lake Parkway, the existing road that more or less parallels the existing Highway 50 on the north side of the existing highway, from a three lane road to a four lane road, eliminating its existing bike lane. (Highway 50 EIR/EIS 2-23.) This conversion would add more vehicle capacity to the overall alternative and it would reduce bicycle connectivity along Lake Parkway in a manner that does not appear consistent with the overall project objectives.

August 15, 2017  
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impacts. While we recognize that the existing conditions, in terms of traffic through the South Shore/Stateline tourist core area and cut-through traffic in Rocky Point, are a legitimate concern, the Project and its impacts must be fully disclosed and considered. The Project will significantly impact the predominately low income, Hispanic, and Asian residents of Rocky Point and may adversely impact VMT in the basin and increase GHG emissions, contrary to statewide goals. In order to determine whether these impacts are warranted, the EIR needs to provide an adequate analysis of all Project impacts and potentially feasible mitigation measures and alternatives that may reduce those impacts. Without a thorough analysis, the decision makers and the public lack the information necessary to make an informed decision regarding the Project. We appreciate your consideration of our comments.

66-6  
cont

Sincerely,  
  
NICOLE U. RINKE  
Deputy Attorney General  
Land Law Section

For XAVIER BECERRA  
Attorney General

NUR/pc

cc: Carl Hasty, District Manager, TTD  
Adam Spear, General Counsel, TTD  
Joanne Marchetta, Executive Director, TRPA  
John Marshall, General Counsel, TRPA  
(via email)

Letter  
66

California Department of Justice, Attorney General's Office  
July 9, 2017

66-1

The commenter provides introductory text regarding the California Attorney General Office's authority and interest in the project and a request for consideration of their late comments. The commenter states that the major concern with the EIR/EIS/EIS is that it does not analyze a reasonable range of alternatives, including those that would avoid the Rocky Point neighborhood, such as improvements to the existing highway alignment or different realignment alternatives. The commenter also summarizes concerns related to:

- ▲ the preferred alternative being 0.4 mile longer than the existing section of US 50 and that the EIR/EIS/EIS does not quantify operational emissions resulting from increased VMT and GHG emissions;
- ▲ the EIR/EIS/EIS not considering the full panoply of mitigation measures that may be able to reduce impacts to the Rocky Point neighborhood.

This comment is a summary of more detailed comments provided below. See the Response to Comments 66-2, 66-3, and 66-5.

66-2

The commenter states that the EIR/EIS/EIS does not consider a reasonable range of alternatives that could potentially reduce the project's impacts on the Rocky Point neighborhood, including using the existing highway alignment or a "north-side alignment" (i.e., "lake-side alignment").

As described below, the range of alternatives considered during the planning process of the US 50/South Shore Community Revitalization Project was robust. The Draft EIR/EIS/EIS considered 16 alternatives developed during project planning that were ultimately dismissed from further discussion (see Table 2-5 in Section 2.5, "Alternatives Considered but Eliminated from Further Discussion," of this Final EIR/EIS/EIS and Appendix C of the Draft EIR/EIS/EIS). The discussion of the range of alternatives, however, must take into account how they directly relate to the purpose and need for the project, the conditions existing on the ground, the potential impacts of the various proposals, and the alternatives reasonably feasible in light of those – and other considerations.

#### **Purpose and Need/Objectives of the Project**

The project purpose, need, and objectives are described in Chapter 1, "Introduction," of this Final EIR/EIS/EIS and in Chapter 1, "Introduction," of the Draft EIR/EIS/EIS. Some of the purposes and need for the project include improving the environmental quality of the area; safety for residents, pedestrians, and bicyclists in local neighborhoods and multimodal mobility and safety throughout the study area; implementing regional and local plans; and addressing neighborhood traffic operations, such as the "cut-through" traffic already existing in the Rocky Point neighborhood. Many of the project objectives that would be achieved by the project overlap with the purpose and need for the project, including reducing "cut-through" traffic in local neighborhoods, developing a complete street for all users, and improving environmental conditions within the corridor. The project would also achieve the project objective related to creating gateway and streetscape features with a sense of place, align with complete streets principles, is reflective of Lake Tahoe's natural setting, and provide effective way-finding.

#### **Existing Conditions**

The study area includes the entire tourist core, including the resort-casinos, Heavenly Village, Heavenly Village Center, and Edgewood Golf Course, as well as the Rocky Point neighborhood to the southwest of Heavenly Village Center, the Tahoe Meadows Historic District neighborhood, and the lake-side neighborhood between US 50 and Lake Tahoe.

Alternatives B, C, and D propose to realign US 50 through the Rocky Point neighborhood and on the mountain side of the casinos. The Rocky Point neighborhood contains primarily single-family and multi-family dwelling units with some hotel/motels located along Pioneer Trail. The local roadways in this residential neighborhood are used by commuters and increasing numbers of visitors as a cut-through option to avoid traveling through the congested US 50 tourist core. The neighborhood on the lake side of US 50 is characterized by a large number of hotel/motels, some of which include rooms that are used for Single-Room Occupancy (SRO) units, along with multi-family dwelling units and some single-family dwelling units. Residents and visitors in this neighborhood can easily walk or ride bicycles to the lake on the local roads in this neighborhood.

#### **Alternatives Considered**

To meet the basic project objectives, three types of options exist: (1) use the existing right-of-way and separating through traffic from pedestrians; (2) moving US 50 to the north, or lakeside, of the existing corridor; or (3) moving US 50 to the south, or mountain side, of the existing corridor. Each of these types of alternatives are discussed herein and further details provided in Table 2-5 in Section 2.5, "Alternatives Considered but Eliminated from Further Discussion," of this Final EIR/EIS/EIS and Appendix C of the Draft EIR/EIS/EIS.

### **Existing Right-of-Way Alternatives**

#### **Tunnel Alternatives**

Alternatives involving tunneling under the tourist core and Rocky Point neighborhood were considered in the planning process. The tunnel alternatives were dismissed for constructability and cost reasons, including concern with agency approvable operations and geometric design (i.e., arrangement of the visible elements of a road, such as alignment, grades, sight distances, widths, slopes, and other similar elements.), challenging construction techniques requiring a specialized contractor, multi-year construction with complex traffic handling/detours, and excessive export material. The tunnel underneath the tourist core would also result in impacts to an estimated 15 commercial properties and 30 to 40 residential dwelling units. The tunnel underneath the Rocky Point neighborhood would result in similar impacts to businesses and residential units as the build alternatives, except that after construction, much of the area could be redeveloped. Each tunneling alternative would have challenges with geometrics, operations and maintenance, and utilities (see Appendix C of the Draft EIR/EIS/EIS).

#### **Alternatives Involving a Pedestrian Skywalk**

Alternative E would construct a raised pedestrian walkway over existing US 50 alignment within the portion of the tourist core between the resort casinos. This alternative would not meet several of the project's purposes, needs, and project objectives identified in Chapter 1, "Introduction," of the Draft EIR/EIS/EIS. This alternative and other alternatives that would use the existing highway alignment would not achieve the project's need for redevelopment and revitalization opportunities. As described on page 1-9 in Chapter 1, "Introduction," of the Draft EIR/EIS/EIS a portion of the study area is within the TCAP, for which there are guiding principles to establish a diverse and concentrated mix of uses to help achieve revitalization in this area. Alternative E does not provide such opportunities for redevelopment in part because the roadway through the tourist core would not be improved to become a complete street, which includes improving bicycle safety. With construction of a skywalk or a series of pedestrian bridges through the tourist core, there would be insufficient space available to allow for bicycle lanes. For this reason, Alternative E would not achieve the project objectives to decrease dependence on the use of private automobiles or facilitate the creation of a safe and walkable district that enhances pedestrian and bicyclist activities and safety. Also, Alternative E does not provide opportunities for creating mixed-use development at the gateway to the tourist core area. For these reasons, Alternative E would not meet the project objective to create gateway and streetscape features that create a sense of place.

The Regional Plan, TCAP, SSAP, and 2012 RTP/SCS describe the project as realigning US 50 outside of the existing right-of-way to narrow the existing US 50 to be more pedestrian friendly. These plans describe the project as existing US 50 becoming a local road (City of South Lake Tahoe 2013:3-12 and 6-4; Douglas County and TRPA 2013:65; TRPA 2012:4-6; and TMPO and TRPA 2012:4-6). Alternative E would retain the existing US 50 alignment and, although this alternative would improve pedestrian safety, it would not reduce the number of lanes through the resort-casino portion of the tourist core to create a complete street with bicycle lanes. For these reasons, Alternative E would not fulfill the purpose of the project to be consistent with the Loop Road System concept or implement regional and local plans, including the Lake Tahoe Regional Transportation Plan and would not meet the need of the project to implement regional and local plans.

Alternative E also has several other issues, which make it infeasible to implement, including potential damage to casino buildings resulting from vibration related to pile and foundation installation during construction and adverse effects related to a TRPA scenic threshold. Foundation construction, including piling, on structures adjacent to existing buildings always carries the potential for negative impacts to the existing foundations and structures. This is

particularly true in the casino core due to the extremely tight spaces, unknown condition of existing foundations, below-ground utilities, and the existing pedestrian tunnel under the highway between the casinos that is also in conflict with the construction of new pilings. Pile installation, particularly pile driving, within 100 feet of any of the buildings in the resort-casino portion of the tourist corridor could result in damage to the existing buildings that could not be avoided or mitigated to a less-than-significant impact (see pages 3.15-27 – 3.15-31 and 3.15-62 – 3.15-63 in Section 3.15, “Noise and Vibration,” of the Draft EIR/EIS/EIS).

#### **Multiple Smaller Pedestrian Walkways**

To address the significant impact from Alternative E on scenic quality and visual character (see page 3.7-39 of Section 3.7, “Visual Resources/Aesthetics,” of the Draft EIR/EIS/EIS), Mitigation Measure 3.7-1b proposes a series of smaller pedestrian walkways over US 50. However, this mitigation measure would substantially alter the nature of Alternative E as an enhanced pedestrian facility and plaza-like space and would not feasibly meet project objectives for reasons similar to those described above for Alternative E. Alternative E would also result in a significant and unavoidable visual impact related to a TRPA threshold not only from the spans over the highway, but also the extensive ramping that would be required to meet ADA criteria, or elevator shafts to reach the elevated crossings. TRPA would be unable to approve Alternative E because it would result in degradation of a TRPA threshold. To clarify the inability of the proposed mitigation measure, a series of smaller pedestrian walkways over the highway, to achieve the intent of Alternative E and to be unable to meet project purpose, need, and objectives, the discussion of this alternative proposed in Mitigation Measure 3.7-1b has been revised in this final environmental document. This change is presented in Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures.” The correction does not alter the conclusions with respect to the significance of any environmental impact.

The last paragraph on page 3.7-49 of the Draft EIR/EIS/EIS is revised to read as follows:

Reducing the scale of the structure associated with Alternative E, by constructing narrow pedestrian walkways over the highway rather than a deck structure that fully encloses the highway, would reduce the visual impact of the structure, potentially to a less-than-significant level, depending on the design. However, this mitigation would substantially alter the nature and intent of Alternative E because these walkways would not provide enhanced pedestrian facilities or plaza space for pedestrians in the resort-casino portion of the tourist core where people could gather and special events could be held. Additionally, the improvements would be limited to the area within the resort-casino portion of the tourist core.

For these reasons, a set of narrow A-series-of pedestrian walkways would and is likely to not feasibly meet the project purpose and need and project objectives: related to improving the corridor consistent with the Loop Road System concept; improving bicycle safety; implementing regional and local plans, including the Lake Tahoe Regional Transportation Plan, Lake Tahoe Environmental Improvement Program, the TCAP, and the SSAP; improving safety for residents, pedestrians, and bicyclists in local neighborhoods; creating opportunities for redevelopment and revitalization in the study area; creating gateway and streetscape features that align with complete streets principles; redevelopment and revitalization; decreasing dependence on the use of private automobiles; improving connectivity, reliability, travel times, and operations of public transportation modes, including increased mobility and safety for bicycles and pedestrians and enhanced public access to Van Sickle Bi-State Park; and creating gateway and streetscape features that create a sense of place. This alternative could reduce dependence on private vehicles and facilitate the creation of



a safe and walkable district that enhances pedestrian and bicycle activities and safety, but to a lesser degree than could occur with Alternatives B, C, and D.

Therefore, recognizing the uncertain effectiveness and feasibility, it is important to disclose the potential for Alternative E to result in a **significant and unavoidable** visual impact for purposes of CEQA and TRPA.

#### **Lake-Side Realignment Alternatives**

The comment includes a footnote stating that Appendix C includes three north side alignments, but Chapter 2 (Table 2-5) of the Draft EIR/EIS/EIS only includes two. The commenter appears to have missed one of the lake-side alternatives considered in Table 2-5. The column of Table 2-5 labeled “Reasons Alternative Dropped from Consideration” (see Section 2.5, “Alternatives Considered but Eliminated from Further Discussion,” of this Final EIR/EIS/EIS) includes the corresponding map number in Appendix C. The three lake-side alternatives considered but eliminated from further discussion include: (1) 2004 US 50/Stateline Area Transportation Study – Alternative A (Map 6), (2) 2004 US 50/Stateline Area Transportation Study and 2010 Project Study Report – Alternative B (Map 7), and (3) PSR Alternative A – Lakeside Alternative (Map 5). These three lake-side alternatives would avoid dislocating residences in the Rocky Point neighborhood, but cause other environmental impacts including impacts to residences and businesses. These are identified in Table 2-5 and shown in Appendix C as Maps 5, 6, and 7. Each of these alternatives was dismissed for constructability and cost reasons that outweighed benefits; however, there are additional challenges with these alternatives.

#### **Community Impacts of Lake-Side Alternatives**

The lake-side alternatives would pass through a neighborhood with similar demographic characteristics as the Rocky Point neighborhood that would be affected by the realignment alternatives considered in detail in the Draft EIR/EIS/EIS. The lake-side neighborhood is characterized by a greater number of hotel/motels and fewer single-family dwellings than in the Rocky Point neighborhood. Although there are fewer long-term residences in the lake-side neighborhood than in Rocky Point, this neighborhood is home to a similar proportion of the population that are minorities and living below poverty level (see table below). The highway realignment and physical division of the neighborhood associated with a lake-side alternative would change the character and cohesiveness of the neighborhood by displacing residents and substantially changing the visual character and ambient noise environment similar to Alternatives B, C, and D, albeit for a different neighborhood. The lake-side alternatives would result in fewer impacts to residents than the number of residents that would be affected by the proposed realignment alternatives, but the lake-side alternatives would result in a greater number of businesses and employees that would be impacted compared to the realignment alternatives (see tables below).

The loss of businesses would result in a loss of Transit Occupancy Tax (TOT) revenues for the City of South Lake Tahoe, which could be greater than the loss of TOT revenues from the realignment alternatives considered in the Draft EIR/EIS/EIS. The number of people that live in SRO units could increase the number of people living below the poverty line mentioned in the table below since SROs often serve as a housing solution for people requiring low-income housing. Although Alternative D would affect an estimated 57 employees, which would be similar in magnitude to the 47 to 65 employees that could be affected by the lake-side alternatives. Revisions have been made to Table 2-5, as shown in Section 2.5, “Alternatives Considered but Eliminated from Further Discussion,” of this Final EIR/EIS/EIS to reflect these impacts.

**Minority and Poverty Characteristics of Rocky Point and Lake-Side Neighborhoods**

Location	Minority (percent)	Population Living Below Poverty Level (percent)
CIA Study Area (includes Rocky Point neighborhood) <sup>1</sup>	3,448 (54.8)	1,254 (16.0)
Rocky Point Neighborhood	846 (58.1)	390 (24.3)
Lake-Side Neighborhood	191 (56.9)	183 (18.3)

<sup>1</sup> From Tables 3.4-1 and 3.4-5 in Section 3.4, "Community Impacts," in the EIR/EIS/EIS.

Source: US Census Bureau 2015a, US Census Bureau 2015b

**Summary of Affected Businesses and Employees**

Alternative	Number of Businesses <sup>1</sup>	Estimated Number of Employees
Alternative B <sup>2</sup>	4	14
Alternative C <sup>2</sup>	4	14
Alternative D <sup>2</sup>	7	57
Lake-Side Alternatives – Maps 5 and 6 <sup>3</sup>	24	65
Lake-Side Alternatives – Map 7 <sup>3</sup>	14	47

Notes:

<sup>1</sup> Businesses include motels.

<sup>2</sup> Information from Table 3.4-14 in Section 3.4, "Community Impacts."

<sup>3</sup> Conservative estimates of existing numbers of employees are based on similar businesses for which employee numbers were available related to the build alternatives.

See "Methods and Assumptions" on pages 3.4-40 through 3.4-41 of Section 3.4, "Community Impacts," in the Draft EIR/EIS/EIS.

Source: Compiled by Ascent Environmental in 2018

**Summary of Units Affected by Lake-Side Alternatives**

Building Type	Number of Motels/Units Affected	Number of SRO Units Affected
<b>Alternative B<sup>1</sup></b>		
Hotel/motels (complexes/rooms)	4 / 114	44
Multi-family dwellings (apartments) <sup>2</sup>	64	NA
Businesses (in addition to hotels/motels)	4	NA
<b>Alternative C<sup>1</sup></b>		
Hotel/motels (complexes/rooms)	4 / 114	44
Multi-family dwellings (apartments) <sup>2</sup>	59	NA
Businesses (in addition to hotels/motels)	4	NA
<b>Alternative D<sup>1</sup></b>		
Hotel/motels (complexes/rooms)	2 / 41	4
Multi-family dwellings (apartments) <sup>2</sup>	59	NA
Businesses (in addition to hotels/motels)	5	NA
<b>Lake-Side Maps 5 and 6</b>		
Hotel/motels (complexes/rooms)	21 / 741	122
Multi-family dwellings (complexes, apartments)	4 / 41	NA

**Summary of Units Affected by Lake-Side Alternatives**

Building Type	Number of Motels/Units Affected	Number of SRO Units Affected
Businesses (in addition to hotels/motels)	3	NA
<b>Lake-Side Map 7</b>		
Hotel/motels (complexes/rooms)	11 / 481	23
Multi-family dwellings (complexes, apartments)	3 / 8	NA
Businesses (in addition to hotels/motels)	3	NA

**Notes:**

<sup>1</sup> Information from Table 3.4-13 on page 3.4-44 of the Draft EIR/EIS/EIS and Table 3.4-14 on page 3.4-51 of the Draft EIR/EIS/EIS.

<sup>2</sup> Only total number of multi-family dwelling units are provided.

Source: Compiled by Ascent Environmental in 2017

**Operations**

The three lake-side alternatives would operate poorly due to the number of required driveways for businesses and residences. These alternatives would also require people walking or bicycling from the tourist core to cross the realigned highway on their way to the lake. With these alternatives, realigned westbound US 50 would operate at LOS E for the lake-side alternative shown in Map 5 and LOS F for the lake-side alternatives shown in Maps 6 and 7 (Caltrans et al. 2009). For comparison, both directions of travel for US 50 would operate at LOS C or better for the realignment alternatives considered in detail in the Draft EIR/EIS/EIS. These alternatives would require a separate frontage road and driveway consolidation, which would increase impacts to businesses and residents in the lake-side neighborhood because additional ROW area along the realigned US 50 would need to be acquired. The estimated number of businesses and residents that would be affected by realigned US 50 and the frontage road is reflected in the table, "Summary of Units Affected by Lake-Side Alternatives," above. The lake-side realignment alternative shown in Map 7 was also eliminated from consideration for numerous nonstandard geometrics and the need for a five-point intersection. Similar to the emergency impacts that would occur for Alternative C (see Impact 3.6-9 and 3.6-19 in Section 3.6, "Traffic and Transportation," of the Draft EIR/EIS/EIS), which includes one-way traffic circulation through the resort-casinos and on the mountain side realignment of US 50, these alternatives could increase emergency response times due to the indirect emergency access route through the resort-casinos.

**Consistency with Regional Transportation Plan**

The 2012 RTP/SCS describes the project as realigning US 50 on the mountain side of Lake Parkway and narrowing the existing US 50 to be more pedestrian friendly. This plan describes the project as existing US 50 becoming a local road (TMPO and TRPA 2012:4-6). The alternatives that propose to realign US 50 with a loop on the lake side would not be consistent with the RTP because each of the lake side alternatives would realign US 50 Westbound along Lake Parkway, Pine Boulevard, and Park Avenue and the existing US 50 through the tourist core would become two eastbound traffic lanes. The Map 7 alternative would also include a transit lane on existing US 50 through the tourist core. The lake-side loop alternatives would not reduce the number of travel lanes through the tourist core and create a more pedestrian-friendly main street.

**Walkability to the Lake**

The lake-side alternatives would decrease the ease of walkability for visitors and residents in the lake-side neighborhood to walk or bicycle to the lake. These alternatives would reconstruct existing roads with one lane for each travel direction as a highway with two through lanes westbound, plus a single eastbound lane for local access and a center two-way left-turn lane. Traffic on US 50 westbound would travel at greater speeds than allowed under

existing conditions through the lake-side neighborhood increasing concerns for conflicts with pedestrians and bicyclists trying to access the lake. Additionally, pedestrians would have to cross a larger road in addition to a frontage road as they travel through this area between the lake and their motel or residence.

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

The lake-side alternatives would not provide opportunities for achieving the project's need for redevelopment and revitalization. As described on page 1-9 in Chapter 1, "Introduction," of the Draft EIR/EIS/EIS, a portion of the study area is within the TCAP, for which there are guiding principles to establish a diverse and concentrated mix of uses to help achieve revitalization in this area. The lake-side alternatives do not provide such opportunities for redevelopment in part because the tourist core along existing US 50 would not be improved to become a complete street and more inviting, walkable environment. Also, although replacement housing and relocating businesses would be an element of these alternatives, the lake-side alternatives do not provide opportunities for creating mixed-use development at the gateway to the tourist core area around the US 50/Pioneer Trail intersection. The lake-side alternatives would not meet the purpose of enhancing visitor and community experience or promote the economic vitality of the area without, at a minimum, reducing the roadway through the tourist core to create a complete street that is safe and inviting for all users. For these reasons, the lake-side alternatives would also not meet the project objective to create gateway and streetscape features that create a sense of place.

The lake-side alternatives would not meet the purpose and need for environmental quality improvement in the area or the project objective to improve the environmental conditions within the corridor as it relates to water quality. The lake-side alternatives shown in Maps 5 and 6 would eliminate parts of the Pine Boulevard stormwater basins to provide for ROW needs for the realigned highway and frontage road. The Pine Boulevard stormwater basins provide secondary treatment for runoff that is collected in the Fern Road basins before those flows are discharged to the lake. Development of stormwater basins lakeward of Pine Boulevard would prove challenging due the limited vertical distance between groundwater and subsurface stormdrains resulting from proximity of the lake. Because of this difficulty, stormwater runoff from residential developments lakeward of Pine Boulevard often drains directly to Lake Tahoe without treatment. Roadway runoff contains much higher sediment and pollutant concentrations than runoff from residential areas. New stormwater collection systems in this area would likely need active treatment systems. It is unlikely that it would be economically feasible to reliably capture and infiltrate or treat the volume of roadway runoff generated by the lake-side alternatives because of the cost of an active treatment system, and implementation of these alternatives could create adverse water quality affects. The mountain side realignment alternatives (Alternatives B, C, and D) could affect the Fern Road stormwater basins, but offer multiple opportunities for stormwater collection and treatment (including existing secondary treatment in the Pine Boulevard stormwater basins).

Revisions have been made to Table 2-5 as shown in Section 2.5, "Alternatives Considered but Eliminated from Further Discussion," of this Final EIR/EIS/EIS to reflect these impacts and characteristics of the lake-side alternatives.

#### **Additional Lake-Side Alternative**

An additional realigned US 50 lake-side alternative that includes two lanes for westbound traffic, two lanes for eastbound traffic, and a center two-way left-turn lane was added for consideration to Table 2-5 (see Section 2.5, "Alternatives Considered but Eliminated from Further Discussion," of this Final EIR/EIS/EIS). This alternative would also convert existing US 50 through the tourist core into a local street that would be narrowed to one lane for each direction and complete street improvements, including bicycle lanes. No changes would be proposed for the Rocky Point neighborhood or Lake Parkway on the mountain side of the

tourist core. Traffic operations and business and residential impacts for this lake-side alternative would be similar to those described above for the Maps 5 and 6 lake-side alternatives, requiring construction of a separate frontage road and driveway consolidation.

Compared to the other lake-side alternatives, this alternative would meet the purpose of enhancing visitor and community experience and promoting the economic vitality of the area by reducing the roadway through the tourist core to create a complete street that is safe and inviting for all users. With the complete street through the core, the 5-lane lake-side alternative would meet the project objectives related to decreasing dependence on the use of private automobiles; improving connectivity, reliability, travel times, and operations of public transportation modes, including increased mobility and safety for bicycles and pedestrians; and creating streetscape features that create a sense of place.

By allowing two-way traffic through the tourist core, this alternative would not adversely affect emergency response times, like the other lake-side alternatives. However, this alternative would not achieve other project purposes, needs, and objectives similar to the lake-side alternatives associated with Maps 5, 6, and 7 identified in 2-5 of the Draft EIR/EIS/EIS. These include the project purpose, need, and objectives related to improving safety for residents, pedestrians, and bicyclists in local neighborhoods; environmental quality improvements; reducing “cut-through” traffic in the Rocky Point neighborhood; and creating gateway features. Like the other lake-side alternatives, this alternative would adversely affect walkability and bikability to the lake from the tourist core, would impact stormwater basins along Pine Boulevard, and would not eliminate cut-through traffic on local roads in the Rocky Point neighborhood.

#### **Conclusion**

The Draft EIR/EIS/EIS and revisions to the Draft EIR/EIS/EIS described herein and in Chapter 2, “Proposed Project and Project Alternatives,” and Chapter 3, “Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures,” considered a reasonable range of alternatives, with four build alternatives and one no build alternative analyzed at an equal level of detail in the EIR/EIS/EIS and 17 alternatives that were considered but eliminated from further discussion, including the new five-lane lake-side alternative that included complete streets improvements through the resort-casino corridor. A number of alternatives that avoided impacts on the Rocky Point neighborhood were assessed, although dismissed from further discussion for reasons related to constructability and cost that outweighed the benefits as well as inability to meet a number of the project’s purposes, needs, and objectives.

66-3

The commenter states that the EIR/EIS/EIS should consider all feasible mitigation measures that may address environmental justice impacts to the Rocky Point neighborhood. The commenter focuses on impacts to the Rocky Point neighborhood related to noise, community cohesion, and scenic resources. The commenter states that although the EIR/EIS/EIS recognizes that the project would have significant and unavoidable impacts to the Rocky Point neighborhood, it does not discuss potential mitigation measures that may avoid or minimize those impacts. The commenter suggests that TTD could acquire additional parcels—beyond those that would be necessary for the new right-of-way alignment—as buffers that could be left vacant to create more distance between the remaining residences and the realigned highway. The commenter suggests that additional parcel acquisition could reduce noise and scenic impacts within the community. The commenter also suggests that TTD could install a signalized intersection to serve the neighborhood to address community cohesion impacts.

The EIR/EIS/EIS does consider mitigation to avoid or minimize environmental impacts to the Rocky Point neighborhood. The EIR/EIS/EIS provides sufficient mitigation measures, including noise-reduction features and options to acquire additional properties along realigned US 50, to

reduce potential impacts to this neighborhood. Since the release of the Draft EIR/EIS/EIS and receipt of this comment letter, TTD has committed to additional project refinements to address the adverse effects of the project on community character and cohesion within the Rocky Point neighborhood. TTD has committed to implementing neighborhood design amenities in the Rocky Point neighborhood within the study area that would enhance the community character of the neighborhood that remains after realignment of US 50. Such amenities would include a community park and street lighting (see the discussion under the header “Project Refinements to Alternative B” in Section 2.4.2, “Alternative B: Triangle (Locally Preferred Action),” of this Final EIR/EIS/EIS). While these project features would lessen impacts on community cohesion through creating a community gathering space and improving nighttime visibility, the potential scenic and community impacts in the Rocky Point neighborhood would remain significant and unavoidable because the physical division of the Rocky Point neighborhood associated with the new US 50 alignment and associated changes in visual character and noise resulting from transportation improvements would remain.

With respect to noise, Mitigation Measures 3.15-3a through 3d comprehensively address the suite of feasible noise-reduction measures (see pages 3.15-63 – 3.15-72 of the Draft EIR/EIS/EIS). Implementation of these mitigation measures would substantially reduce project-related traffic noise. Mitigation Measures 3.15-3a, 3b, and 3c require that TTD prepare a study supplemental to the Noise Abatement Decision Report that identifies all necessary measures to ensure attainment of all applicable TRPA thresholds and identify all feasible measures to reduce traffic noise increases as stated in the mitigation. A set of feasible noise reduction measures that would benefit the most receptors and meet noise standards would be included in the study. This additional study would be required at a later point in the planning and design process when more specific project design details are available. These mitigation measures also clearly state Performance Requirements, which are achievable through implementation of some combination of the Noise Reduction Features identified in the measures. A significant and unavoidable conclusion was made out of an abundance of caution and based on the substantial reduction in noise levels that would be needed at certain receptor locations and the inability to determine with certainty that adequate noise reductions could be made to reduce the impact to a less-than-significant level. Also, there are some outlying receptor sites along Pioneer Trail (such as Receptor 34) that would not entirely be mitigated such that the resultant increase in noise would not be 3 dB or greater, the stringent noise standard used to draw CEQA and TRPA noise conclusions in the EIR/EIS/EIS. It is important to note that for highway projects, FHWA and Caltrans consider a 12 dB or more increase in noise to be the level of increase needed before considering a change in noise level to be significant or adverse. Also see Response to Comments 12-62 and 12-74, which provide additional discussion of traffic noise impacts and the approach to the noise mitigation measures.

The commenter’s suggestion for additional property acquisition reflects what is already proposed in Mitigation Measures 3.15-3a through 3d (see last bullet on page 3.15-65 of the Draft EIR/EIS/EIS). Additional property acquisition would impact additional low income and/or minority residents (see “Minority and Poverty Characteristics of Rocky Point and Lake-Side Neighborhoods” table above). Mitigation Measures 3.15-3a through 3d would apply to those properties most impacted, where a discernible increase in noise would occur (i.e., a 3-dB increase in noise), by the highway realignment as suggested in this comment. As described in these mitigation measures, acquisition of additional properties would only occur if other feasible noise-reduction measures are not available to achieve the applicable standards or minimize traffic noise increases to less than 3 dB CNEL. During project approval, decisionmakers could choose to seek acquisition of additional properties along the realigned US 50 to increase the distance between the remaining residences and the new highway and avoid or further reduce noise and scenic impacts of the project. The comment is noted for consideration during subsequent project implementation.

The commenter also questions whether a mitigation measure might exist in place of a pedestrian bridge over US 50, which the commenter recognized was dismissed because it would not reduce trip length and connectivity for residents southwest of the highway and would require long approach ramps to comply with Americans with Disabilities Act (see page 3.4-36 of the Draft EIR/EIS/EIS). The long approach ramps would increase the cost of the project because acquisition of additional ROW would be required, and more residents would be displaced. The commenter's suggestion to consider other potential feasible mitigation measures is addressed in Response to Comment 11-15, which discusses installing a mid-block pedestrian crossing with a pedestrian beacon along the realigned US 50. As described in that response, locating a mid-block crossing would not be feasible because of its location less than 1,000 feet from the new signalized intersection at Pioneer Trail and in the middle of a curve that is super elevated such that the crosswalk would not meet ADA standards. The addition of a crosswalk at this location would also be dangerous as a result of limited line of sight for pedestrians and vehicles near the curve. Also, realigned US 50 would include pedestrian features similar to the existing Linear Park (see Exhibit 3.7-21 on page 3.7-52 of the Draft EIR/EIS/EIS), providing a safe and appealing walkway along the highway to one of the signalized crossings. Additionally, the increase in trip length for these residents to shopping and nearby commercial properties would be an estimated 0.1 mile or about 500 feet (see page 3.4-19 of the Draft EIR/EIS/EIS). Implementation of Alternatives B, C, and D would not preclude access for residents in the Rocky Point neighborhood to high quality food choices and public health resources. For these reasons, there are no additional feasible mitigation measures to avoid or reduce impacts related to community cohesion and physical division of the Rocky Point neighborhood.

As for the comment regarding noise, a barrier would be constructed as a combination of a berm and wall structure, with the construction of an earthen berm and landscape planting intended to minimize the visual impact of the wall component while also serving as a noise-reducing feature. In the analysis and Mitigation Measure 3.7-1a (see pages 3.7-29 and 3.7-49), the Draft EIR/EIS/EIS notes that realigned US 50 and the noise barrier would be designed in accordance with all applicable design standards and guidelines resulting in a high level of visual quality for these new built features. Ultimately, introduction of a highway through a residential neighborhood and introducing the highway project, including the required noise wall mitigation, substantially alters the neighborhood's visual setting resulting in a significant and unavoidable impact on scenic quality and visual character (see pages 3.7-29 and 3.7-49 of the Draft EIR/EIS/EIS). Without a noise wall along realigned US 50 through this neighborhood, a majority of the Rocky Point neighborhood would be exposed to significant noise impacts and a substantial number of properties would need to be acquired to avoid exposing those residents to a significant increase in traffic noise. Furthermore, a secondary effect of the noise wall would be to block vehicle headlights from intruding onto residential properties (see Mitigation Measure 3.7-3 on page 3.7-50 of the Draft EIR/EIS/EIS). There is no feasible mitigation measure that could avoid or reduce the substantial adverse visual changes in the Rocky Point neighborhood that would not result in a greater number of displaced residents if additional properties are required or would substantially alter the nature of Alternatives B, C, and D that realigns US 50 through the neighborhood and on the mountain side of the tourist core. Changes in scenic quality and visual character in the Rocky Point neighborhood as a result of implementing the project is also addressed in Impact 3.7-1 on pages 3.7-17 – 3.7-42 of the Draft EIR/EIS/EIS and in Mitigation Measure 3.7-1a on page 3.7-49.

The comment includes a footnote that asserts the EIR/EIS/EIS did not identify scenic impacts from a widened roadway along Lake Parkway outside of the Rocky Point neighborhood as significant. The EIR/EIS/EIS determined that widening the road and increasing the amount of traffic on realigned US 50 along Lake Parkway would result in a less-than-significant impact on scenic quality and visual character because, as described on page 3.7-28 of the Draft EIR/EIS/EIS:



The proposed new features of Alternative B along Lake Parkway and Montreal Road would reduce the level of intactness of the landscape and its freedom from encroaching elements, but not enough to substantially degrade the visual quality of the setting. The existing visual character of the area would be maintained through implementation of various design elements. The realigned highway would be designed in accordance with all applicable design standards and guidelines. The project would include improvements to the entrance to Van Sickle Bi-State Park (as depicted in Exhibit 3.7-8). The retaining walls and pedestrian overcrossing would be given context-sensitive aesthetic treatments. The overcrossing would serve as a gateway between California and Nevada.

The EIR/EIS/EIS includes mitigation measures that reduce traffic noise impacts to receptors in the Rocky Point neighborhood to the extent feasible and the significant and unavoidable impact conclusion has been made out of an abundance of caution based on lack of certainty regarding the ability to implement some of the noise reduction features for some sensitive receptors. The realigned highway and other project improvements, such as landscaping and sound wall, would exhibit a high level of design quality compatible with the surrounding neighborhood and forest in accordance with all applicable standards and design guidelines. However, the visual impacts and community character impacts related to realigning a highway through a neighborhood cannot be reduced to a less-than-significant level. However, project refinements have been made to Alternative B, which could also be implemented under Alternatives C and D, to provide some community enhancement features within the affected neighborhood. For these reasons, the mitigation measures and project refinements adequately achieve requirements to mitigate impacts to the extent feasible and there are no additional feasible mitigation measures that could further reduce scenic, community, or noise impacts in the Rocky Point neighborhood.

66-4

The commenter states that the project should provide proximal replacement housing for the Rocky Point residents that the project would displace. The commenter also requests clarification regarding language included in the EIR/EIS/EIS regarding replacement housing being limited to instances where TTD can acquire the owner's development right as part of the acquisition. Finally, the commenter states that TTD must construct replacement housing for motel units that are used as residences near the existing neighborhood/tourist core area.

As described under the header "Project Refinements to Alternative B" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS, following the release of the Draft EIR/EIS/EIS, TTD has continued to refine details of the locally preferred alternative (Alternative B) in response to public input, ongoing agency discussions, and continuing conceptual planning. As part of these project refinements, TTD has revised their commitment to construct replacement housing and is now proposing to construct 102 deed-restricted low-income housing units and seven deed-restricted moderate-income housing units, increasing the number of multi-family replacement units from 76 to 109 units. The replacement housing (i.e., 76 dwelling units) would be constructed prior to groundbreaking activities for transportation improvements in California. TTD has also formalized its commitment to construct replacement housing within the project site watershed, with the preferred location within the proposed mixed-use development sites.

The replacement housing would compensate for the low-income dwelling units (i.e., 58 dwelling units), the moderate-income housing units (i.e., seven dwelling units), and the number of SRO units that would be displaced by the project (i.e., 44 SRO units). The mixed-use development sites would allow for construction of up to 227 total dwelling units. Additional units beyond the minimum 109 replacement units at one or more of the mixed-use development sites would include additional low-income, moderate-income, or market-rate housing.

Within the TRPA region, new development, such as residential units, commercial floor area, and tourist accommodation units (TAUs), are limited by a total number of allocations for each of these development types. To construct new housing, a residential allocation must be obtained or TAUs could be converted to residential units under TRPA Code Section 50.10. When residential or hotel/motel properties are acquired for the project, for replacement dwelling units to be constructed, the residential allocation for the dwelling unit that is displaced must also be acquired along with the property and used to construct the replacement unit. Deed-restricted affordable housing units and moderate-income housing are eligible for TRPA bonus units and are not required to have a residential allocation (TRPA Code Sections 52.3.2 and 52.3.4).

The discussion of TTD's commitment to construct replacement housing has been revised in this Final EIR/EIS/EIS to clarify the need for and use of residential allocations and TAU commodities. This change is presented in Chapter 2, "Proposed Project and Project Alternatives." The correction does not alter the conclusions with respect to the significance of any environmental impact.

Paragraphs 5 and 6 on page 2-5 of the Draft EIR/EIS/EIS are revised to read as follows:

Alternatives B, C, and D would construct an equal number of housing units as replacement for eligible residential units displaced by the project. TTD would replace all multi-family and single-family residential units that it acquires for road right-of-way purposes with multi-family residential units, where TTD is able to acquire the owner's development right as part of the acquisition. TTD has committed to constructing 102 low-income and seven moderate-income replacement housing units regardless of whether or not the residential allocations were acquired with the property within the project right-of-way. If the number of residential allocations acquired by TTD is less than the number of replacement housing units, then tourist accommodation units (TAUs) acquired as part of the project would be converted to residential units on a ratio of one unit for one unit in accordance with TRPA Code Section 50.10. The replacement housing would include deed-restricted low-income and moderate-income housing, which could use TRPA bonus units without the need for residential allocations, and moderate-income housing to replace those displaced by the project. Additional units beyond the minimum 109 replacement units at the mixed-use development sites would include additional low-income, moderate-income, or market-rate housing. A TRPA bonus unit is an additional residential unit that is counted separately from each jurisdiction's residential allocation limits and is intended to incentivize construction of affordable housing units and achievement of the goals and policies of the Regional Plan (see Chapters 50 and 52 of the TRPA Code). All of the replacement housing would be deed restricted such that the housing units must be used for full-time residents and may not be used as second homes or for vacation rental use. The replacement dwelling units would be constructed within the project site walkshed with the preferred location at one or more of the proposed mixed-use development sites.

As part of the property acquisitions for the project, TTD would acquire the TRPA commodities associated with the properties, including residential and ~~tourist accommodation unit (TAU)~~ allocations, and commercial floor area (CFA). TTD would reserve half of the TAU commodities acquired for potential conversion to CFA should that be needed to attract a public-private partnership for the mixed-use commercial and residential development sites. The other half of the TAUs acquired ~~would~~ could be used for replacement housing, if needed, or for any additional or future transit-oriented development (TOD) housing project(s) addressing South Shore needs related to deed restricted low-income, moderate-income, and market rate housing for full-time

residents (not as second homes or for vacation rental use) in designated Town Centers. If the reserved half for possible CFA conversion is not needed, then it would be included in any additional or future TOD residential development project(s) as described.

66-5

The commenter asserts that the EIR/EIS/EIS should include a more complete analysis of the project's impact on VMT, GHG emissions, and climate change. The commenter states that the environmental document prepared for the 2012 RTP was a programmatic EIR and that a project EIR can only rely on a programmatic EIR to avoid analyzing impacts if the project does not have any new effects not analyzed in the programmatic EIR. The commenter further suggests that the project has an impact (an increase in VMT and presumably associated GHG emissions) that was not considered in the programmatic EIR for the 2012 RTP.

Other points raised include:

- ▲ The EIR for the 2012 RTP included a cumulative analysis of 12 transportation projects, but did not include an analysis of VMT or GHG impacts of individual projects within the plan.
- ▲ Some of the projects within the 2012 RTP are ambitious and not guaranteed to be completed. It is improper to declare the project's impact on VMT or GHG emissions as beneficial based on an aspirational collection of projects that may never be completed.
- ▲ Reliance on the 2012 RTP to conclude without analysis that the project's impact on VMT is beneficial is also inadequate because the 2012 RTP did not apply TRPA's threshold standard. The commenter states that the 2012 RTP considered per capita VMT only.

These comments and similar comment raised by others are addressed in Master Response 1, "VMT Analysis and Tiering from the RTP/SCS EIR/EIS."

Finally, the commenter expresses a concern that the project represents an increase in vehicle capacity in the area. A footnote to the comment refers to restriping Lake Parkway from a three-lane road (two travel lanes and one continuous left-turn lane) to a four-lane road (see page 2-23 of the Draft EIR/EIS/EIS). Since publication of the Draft EIR/EIS/EIS, this optional element of the project has been eliminated from further consideration. See Response to Comments 12-16 and 12-17, and the discussion under the header "Project Refinements to Alternative B" in Section 2.4.2, "Alternative B: Triangle (Locally Preferred Action)," of this Final EIR/EIS/EIS regarding the project's effect on roadway capacity and locally preferred alternative refinements that have occurred since release of the Draft EIR/EIS/EIS, respectively.

66-6

This comment includes concluding remarks regarding points made earlier in the letter related to consideration of alternatives that avoid impacts to the Rocky Point neighborhood, additional mitigation measures to further reduce impacts within this neighborhood, constructing replacement housing for displaced residences and motels used as residences, analysis of the project's VMT and GHG impacts. The commenter asserts that full disclosure and consideration of all project impacts and potentially feasible mitigation measures and alternatives that would reduce or avoid those impacts is warranted. This comment is a summary of more detailed comments provided above. See the Responses to Comments 66-2, 66-3, 66-4, and 66-5.

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