

3 COMMENTS AND RESPONSES

This chapter contains comment letters received during the public review period for the Draft EIR/EIS, which concluded on August 15, 2016, including copies of the summary notes from public hearings. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR/EIS.

Table 1-1 in Chapter 1, “Introduction,” presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

Five public hearings were held, as described in Chapter 1, to receive input from agencies and the public on the Draft EIR/EIS. Summary notes of the oral comments at the hearing were prepared.

The oral and written individual comments received on the Draft EIR/EIS and the responses to those comments are provided below. The comment letters and oral comments made at the public hearings are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

3.1 MASTER RESPONSES

Several comments raised similar and/or related issues. Rather than responding individually, master responses have been developed to address the comments comprehensively. An index of master response topics and the section number where it is addressed is provided below. A reference to the master response is provided, where relevant, in responses to individual comments.

- ▲ Vehicle Miles of Travel (VMT) and Level of Service (LOS) (see Section 3.1.1)
- ▲ SEZ Restoration (see Section 3.1.2)
- ▲ Affordable Housing (see Section 3.1.3)
- ▲ Kings Beach Zoning and Shared-Use Path along Brockway Vista Avenue (see Section 3.1.4)
- ▲ Tahoe Marina Lakefront Shared-Use Path Alignment (see Section 3.1.5)
- ▲ Emergency Access and Evacuation (see Section 3.1.6)

3.1.1 Master Response 1 – VMT and LOS

TRPA and Placer County received multiple comments on the transportation and circulation analysis, and in particular the assessment of Vehicle Miles Travelled (VMT) and Level of Service (LOS). This Master Response aggregates and responds to common comments on these topics. It provides relevant background information, as many comments may be addressed through a clearer understanding of the purpose and analytical processes of these two standards of significance. To provide a comprehensive response to comments on the VMT and LOS analysis, this response addresses the following topics:

- ▲ Overview of Draft EIR/EIS findings related to VMT and LOS,
- ▲ VMT background,
- ▲ Transportation model and threshold updates,
- ▲ VMT significance criteria,
- ▲ Land use considerations in the transportation analysis,
- ▲ Cumulative VMT analysis,
- ▲ Trip lengths and traffic counts,

- ▲ Future economic conditions,
- ▲ Requests for localized VMT analysis,
- ▲ LOS background and findings in the Draft EIR/EIS,
- ▲ Proposed change in LOS standard,
- ▲ Existing programs and projects that will improve LOS,
- ▲ Revisions to the Area Plan to improve LOS and VMT, and
- ▲ Mitigation measures for LOS impacts.

OVERVIEW OF DRAFT EIR/EIS FINDINGS RELATED TO VMT AND LOS

Chapter 10 of the Draft EIR/EIS discloses the impacts from implementation of the Area Plan and Tahoe City Lodge alternatives on transportation and circulation. In general, Chapter 10 discloses that implementation of Alternative 1 (the proposed Area Plan) would reduce vehicle miles traveled (VMT) as compared with the baseline condition, due to the more compact land use pattern and mobility improvements. As a result, the Draft EIR/EIS determined that Alternative 1 would have a beneficial impact related to VMT, and the alternative would promote continued attainment and maintenance of TRPA's VMT threshold standard.

Implementation of the proposed Area Plan would also result in an increase in localized traffic congestion during the peak afternoon hour at one roadway segment and one intersection in Tahoe City, as measured by level of service (LOS). As compared to existing conditions, LOS would either continue to operate at an unacceptable level or worsen with additional localized densities in the town centers within the Plan area, but LOS would be somewhat worse under the no project alternative (Alternative 4) than under the proposed Area Plan. In other words, while traffic conditions, as measured by LOS, would continue to degrade slightly, implementation of the Area Plan would serve to reduce the degradation, as compared to doing nothing.

On a local/plan area scale, the Draft EIS/EIR confirmed the conclusion of the RPU and RTP EISs – namely, that implementation of Regional Plan policies in local Area Plans that concentrate development within town centers would reduce vehicle miles traveled. As development is concentrated in town centers, trips, on average, become shorter, and a greater proportion of trips can be made by non-automobile modes; the trade-off can be continued or increased localized congestion within town centers, as a higher proportion of trips originate or end in those areas of concentrated development.

As for impacts from the proposed Tahoe City Lodge project, the Draft EIS/EIR discloses that the project would reduce average daily trips, but produce both a small increase in VMT and decrease in LOS as compared to the baseline condition, but a decrease in VMT and better (increase) LOS when compared to the “No Project” alternative (Alternative 4).

While Chapter 10 analyzes the VMT and LOS that would result from complete buildout of the Plan area and the rest of the Lake Tahoe Basin, Chapter 19 evaluates the cumulative VMT within the Tahoe Basin and LOS that could result from complete buildout of the Plan area, the rest of the Lake Tahoe Basin, and buildout of surrounding areas including Martis Valley, Squaw Valley/Alpine Meadows, and Truckee. The cumulative analysis found that with the addition of external trips that could result from buildout of surrounding areas outside of the Lake Tahoe Basin, VMT in the Tahoe Region would increase above baseline levels, but would remain below the TRPA VMT threshold standard, resulting in a less than significant impact. With respect to LOS, the cumulative analysis found that with the addition of trips associated with buildout of surrounding areas, the same intersection and roadway segment affected by the Area Plan would either continue to operate at an unacceptable level or worsen to an unacceptable level.

VMT BACKGROUND

Chapters 10 and 19 of the Draft EIS/EIR use TRPA's VMT threshold as a standard of significance to determine whether the Area Plan and Tahoe City Lodge project alternatives would result in significant impacts. The VMT threshold implements a Compact directive to reduce dependency on the use of private vehicles and as a rough proxy for the production of nitrates, and entrainment of soil sediments from roads.

Historically, TRPA linked increased VMT with increased traffic, increased nitrate loading into the atmosphere and deposition into Lake Tahoe, and an increase in the airborne concentration of particulate matter known to impact regional and sub-regional visibility and human health (TRPA 1982). The threshold is: “Reduce vehicle miles of travel in the Basin by 10 percent of the 1981 base year values.” Note that there are no other adopted standards regarding VMT in the Tahoe Region (such as a maximum allowed VMT increase by project or by sub-area).

While concisely expressed, the base year values necessary to implement the VMT threshold are difficult to calculate. As adopted, a single numeric standard was not tied to the threshold because VMT is a modeled value and the actual VMT of the Region in 1981 was not known. As a result, TRPA has modeled both the 1981 base value and the current year’s VMT in order to measure compliance with the 10 percent reduction target.

Since the early 1980s, TRPA has used a series of progressively more sophisticated travel models to estimate VMT for the Region and has “backcast” the 1981 value (i.e., extrapolated the value based on modeling of current VMT). Because the significant improvements in transportation models have fundamentally changed their architecture over time¹, modern VMT estimates are not directly comparable to early estimates. As discussed on Draft EIR/EIS page 19-17, “The VMT threshold is periodically updated whenever the TRPA updates its transportation model.”

Senate Bill 375 of 2008 (SB 375) requires regions to more fully integrate their land use and transportation models to examine and document the inter-relationships between land use and transportation efficiency. In the past, Metropolitan Planning Organizations (MPOs) used these tools to perform sequential and isolated analyses. Land use models predicted the type and allocation of land uses, while transportation models predicted resulting mode choice, system capacity, and total travel. SB 375 emphasized the need for an interactive and iterative application of these analysis tools for regional planning.

By mandating the integration of transportation, land use, and housing in the regional planning process for purposes of quantifying reductions in greenhouse gas (GHG) emissions from autos and light-duty trucks, SB 375 has increased the analysis requirements for all MPOs. These increased analysis requirements are reflected in TRPA’s most recent VMT modelling.

TRANSPORTATION MODEL AND VMT THRESHOLD UPDATES

Some comments questioned why different VMT estimates and threshold standards have been identified in different documents, and suggested that the VMT threshold standard is arbitrary.

The summary below describes TRPA’s travel demand model updates since 1981 consistent with federal and state requirements, and the corresponding changes in both forecast VMT and the regional VMT threshold standard. As described below, the VMT threshold standard and estimates are not arbitrary, but the result of better models and data that result in refined estimates over time.

1981, 1987, 1995 Models - Early TRPA transportation models calculated the number of trips made on the highway network and the distance between trip origins and trip destinations and then calibrated its models from current traffic count information. The 1981 and 1987 VMT forecast values were derived from a similar database while the 1995 VMT forecast was developed from a significantly different database, using more accurate spatial socioeconomic data. As a result, the VMT values computed using the 1995 base year model are not directly comparable to the VMT values of the 1981 and 1987 models.

2004 Model - In 2004, to determine an annual VMT estimate for the Threshold Evaluation, TRPA staff analyzed the annual percentage change resulting from traffic counts generated by the 20 count station locations maintained by the California and Nevada Departments of Transportation (Caltrans and NDOT, respectively) and applied this percentage change annually to the 1995 VMT estimate, bringing the estimate

¹ As an example, early models only considered the region’s major roadways, while the current model includes all roadways.

up to a comparative 2004 value. This dataset does not include all Tahoe roadways. This dataset does, however, provide ample data to determine changes in traffic levels between 1995 and 2004. The 2004 model's estimate of basin-wide VMT represents the best available data for both 1995 and 2004, as required to provide a comparison between the required years.

2005–2010 Model – In January 2005, TRPA developed a more modern, tour-based TransCAD travel model to replace its existing three-step TranPlan model. A resident/seasonal resident travel survey was conducted and the data was used to build the new micro-simulated tour-based model. Winter and summer visitor surveys were conducted in January and August of 2004, respectively. The household travel survey was conducted from April through September of 2005. A 2005 Base Year was developed using the newly collected data inputs, and the updated model was used to estimate VMT for the 2008 RTP. Subsequently, this model version was used to estimate VMT for the 2010 RTP Monitoring Report.

2011–2014 Model – In 2010, TRPA initiated an update of its model for the 2012 Regional Plan and Regional Transportation Plan. This effort included analyzing development potential (residential units, commercial floor area [CFA] and tourist accommodation units [TAUs]) authorized by the 1987 Regional Plan. The update also included a comprehensive inventory of developable parcels and an assessment of future development potential that would eventually be included as part of the 2012 Regional Plan update. A post-processing Trip Reduction Impact Tool (TRIA) was developed and used to account for future VMT-reducing policies, programs, and projects that were not reflected in the TransCAD model. The policies, programs and projects that were incorporated into the 2012 Regional Plan update that would reduce trips and VMT include: bike and pedestrian infrastructure, transit service and capacity, intercept lots, parking management strategies, and ridesharing policies, among others. This updated model was used to calculate VMT forecast estimates in the 2011 Threshold Evaluation (TEVAL), the 2012 RTP Monitoring Report, and the 2012 Regional Transportation Plan (RTP) and Regional Plan Update (RPU). The TRIA, as applied in these previous studies, includes VMT reductions associated with assumed reductions in parking supply, such as those proposed in the proposed Area Plan. The result of this factor was estimated to be a small (0.024 percent) reduction in region-wide VMT. More detailed discussion of TRIA can be found in Appendix C of the Tahoe Metropolitan Planning Organization 2012 Regional Transportation Plan.

However, again the fundamental workings of the model had changed significantly, and the street network used in the previous model could not be translated into the new platform. For purposes of understanding VMT threshold attainment status, a method for correlating VMT estimated from the new model to previous estimates of 1981 VMT was needed. For the 2011 Threshold Evaluation, staff created a new estimate for 1981 VMT and the VMT threshold which compared the changes in traffic counts over time and applied that same change to the VMT estimates. This time, the 2010 VMT estimates and traffic counts dating from 1981 to 2010 were used to “backcast” a VMT estimate for 1981. The methodology resulted in the VMT threshold standard as reported in the 2011 Threshold Evaluation (TEVAL), the 2012 RTP Monitoring Report, the Regional Plan Update (RPU), and the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) “Mobility 2035.” Environmental documents for the Village at Squaw Valley and Martis Valley West Parcel specific plans were prepared using the VMT threshold standard as reported in the 2012 RTP/SCS EIR/EIS and the RPU EIS, rounded to the nearest hundred.

2014 RTP Monitoring Report – As an interim approach to determine compliance with the VMT threshold in the 2014 Regional Transportation Monitoring Report, August traffic counts² from 2013 were used to gauge vehicle activity. These traffic counts were indexed to traffic counts from 1981 to estimate the percent decrease in VMT from the 1981 levels. TRPA updates their model every 4 years, consistent with RTP update cycles, thus traffic counts serve an important role in both calibrating TRPA's tour-based model, and also serving as a proxy to annually updating the model for VMT estimation.

During development of the 2014 RTP Monitoring Report, TRPA used a staff recommended fixed number for the Region's VMT Threshold of 2,000,000. The intent of establishing a fixed VMT threshold is that this

² The August 2013 traffic counts used the same 20 count station locations maintained by the California and Nevada Departments of Transportation, as described above. The exact locations of count stations are available from TRPA upon request.

number would be more easily understood by the public, and would not fluctuate with future updates to traffic models. Further, this number approximately, and more conservatively, correlates with the most recent estimate of 10 percent below the 1981 value for VMT. This fixed VMT threshold standard, as recommended by TRPA staff, was reported in the 2014 RTP Monitoring Report, although it has not been adopted as the threshold standard.

Current model updates - After completion of the 2012 Regional Transportation Plan, TRPA again initiated an update to the TransCAD model. The update applied 2010 Census demographic updates and incorporated data from a 2011 license plate survey. The data refinements better identified and responded to changing travel behavior in the Region. Notably, these refinements provided an updated accounting of several variables that serve as critical primary predictors of travel behavior for the TRPA model, including the overall percentage of full-time homeowners, secondary homeowners, commuters, and visitors to the region at the seven Basin-entry locations. The data refinements for this model update also included use of the latest US Census demographic and socioeconomic data (US Census 2010), including: resident vs. seasonal homeownership, persons per occupied dwelling unit, household income, and employment.

The Draft EIR/EIS VMT analysis was conducted using this updated version of the TransCAD model. The 2015 base year in the Draft EIR/EIS was prepared using the 2012 RPU/RTP Model land use inputs (2010 base year), updated by Placer County to include buildout of projects in the Plan area through 2015, as described in the Draft EIR/EIS (pages 10-13 to 10-14). The land use inputs were modelled using the most up-to-date TransCAD model configuration containing the most recent License Plate Survey data. Therefore, this VMT estimate represents a 2015 land use scenario produced with the best available traffic model configuration available at the time the model was run.

Shortly after completing the Draft EIR/EIS model run, TRPA completed an updated inventory of existing development and land uses. This inventory was based on the most recent remote sensing data and on 2014 data available from the various county assessors in the Tahoe Region. This inventory of existing development, as of 2014, was used as the 2014 land use scenario that was modeled for the 2016 TRPA Threshold Evaluation. Like the Draft EIR/EIS, the Threshold Evaluation used the most recent TransCAD model configuration. However, the differences between the Draft EIR/EIS and the Threshold Evaluation baseline conditions are the result of the different land use scenarios modeled for each purpose.

During the review of baseline VMT estimates in response to comments on the Draft EIR/EIS, TRPA noted that the Draft EIR/EIS had inadvertently reported the baseline VMT figure of 1,937,070, which was generated from the 2016 Threshold Evaluation model run, instead of the baseline VMT figure of 1,939,159, which was generated from the Draft EIR/EIS 2015 base year scenario. As described above, the Draft EIR/EIS VMT estimate of the 2015 base year was prepared using the 2012 RPU/RTP model inputs (2010 base year), updated by Placer County to include buildout of known projects (land use changes) through 2015. The 2035 land use scenarios evaluated in Chapters 10 and 19 of the Draft EIR/EIS used this same 2015 land use scenario as a starting point, then modified the land use scenario to reflect build out of each alternative. In contrast, the 2016 Threshold Evaluation model was based on a different 2014 land use scenario that incorporated a more recent inventory of existing development. It should be noted that regardless of the model configuration or land use inputs, estimates of VMT are not precise. Modeled VMT is most useful in comparing the relative VMT generated under different scenarios, and it is less accurate in determining actual existing or future VMT. Thus, the baseline VMT estimate of 1,939,159 should be used as the estimate of baseline VMT for the Area Plan alternatives because this estimate was based on the land use assumptions specific to the Area Plan alternatives, as reported in the Draft EIR/EIS.

The 2015 baseline VMT estimate is corrected to 1,939,159 in the Final EIR/EIS. The VMT at buildout of each Area Plan alternative is unchanged. This correction is reflected in Chapter 2 "Corrections and Revisions to the Draft EIR/EIS." The correction does not alter the conclusions with respect to the significance of any environmental impact. Because the baseline VMT estimate is 2,089 greater than was identified in the Draft EIR/EIS and the buildout numbers are the same as reported in the Draft EIR/EIS, the decrease in VMT (i.e., the difference between baseline and future VMT) under Alternatives 1 and 3 is greater than reported in the

Draft EIR/EIS. This decrease in VMT is considered beneficial. Similarly, the increase in VMT under Alternatives 2 and 4, and in the cumulative scenarios is less than reported in the Draft EIR/EIS.

Table 3-1, below, provides a summary of historical VMT threshold values and existing VMT estimates. The VMT threshold updates since 2008 documented above, are shown in the table for comparison.

Table 3-1 Historical Regional VMT Threshold Standard and Reported VMT Estimates

	Transportation Model	Threshold Standard	Status/Regional VMT Estimate
2016 Threshold Evaluation	2014 model configuration, with updated inventory of existing development	2,030,938	1,937,070 (2014)
Placer County Tahoe Basin Area Plan EIR/EIS	2014 model configuration with modified version of land use inventory from the RPU analyses	2,030,938	1,939,159 (2015)
2014 RTP Monitoring Report	No TransCad model run, index of 2013 and 1981 traffic counts.	2,000,000	1,974,026 (2014)
Squaw Valley Specific Plan EIR	2011 - 2014 model	2,067,600	1,984,600
Martis Valley West Parcel Project EIR		2,067,600	1,984,600
2012 RTP/RPU "Mobility 2035"		2,067,568	1,987,794 (2010)
2012 RTP Monitoring Report		2,067,568	1,987,794 (2010)
2011 Threshold Evaluation		2,067,568	2,036,642 (2011)
2010 RTP Monitoring Report	No TransCad model run, index of most recent available and 1981 traffic counts	1,483,620	1,412,154 (2009)
2008 RTP "Mobility 2030"		1,483,620	1,594,400 (2004)
1981	1981 model	1,700,000	

As described above, the VMT threshold and existing VMT baseline is not arbitrary. Rather, the changes over time are the result of improved models and available data TRPA, like other jurisdictions that maintain such models, continually update travel demand models to incorporate the latest available data, which result in updated model outputs over time. As a result, VMT estimates are revised. Such revisions will continue to occur over time.

Comments stating that VMT estimates do not correlate over time are correct; different models produced different results, which cannot be compared over time. The fact that VMT estimates do not remain fixed does not mean, however, that VMT estimates are inaccurate. Rather, the evolution of VMT estimates is a function of continual refinements to the models used to estimate VMT. Thus, VMT estimates have become more accurate over time, rather than less so. This evolution is expected to continue in the future.

VMT SIGNIFICANCE CRITERIA

Some comments state that the Draft EIR/EIS does not include a discussion of what contribution of VMT would be considered a significant impact. Other comments express concern about the use of the TRPA regional VMT threshold standard as a standard of significance for the cumulative and Area Plan VMT analysis. These comments suggest that because there is low confidence in the status and trends related to VMT, and because existing VMT levels are near the threshold standard, a lower or more stringent VMT level should be used as a standard of significance.

As described on page 4-4 of the Draft EIR/EIS, the significance criteria identified in each section "provides the criteria used in this document to define the level at which an impact would be considered significant." Page 10-15 of the Draft EIR/EIS explains that an alternative would result in a significant impact if it would "cause total VMT within the Tahoe Region to exceed the TRPA Air Quality Threshold value of 2,030,938."

Neither TRPA nor Placer County have adopted significance criteria or formal guidance related to the selection of a VMT significance criteria.

TRPA has consistently used the adopted VMT threshold standard as the applicable significance criteria for the environmental review of regional and sub-regional planning efforts. As TRPA explained in the Regional Plan Update EIS, significance criteria for a regional or sub-regional plan are “based on TRPA environmental threshold standards and regulatory requirements” (Regional Plan Update Draft EIS page 1-11). The adopted VMT threshold standard was used as a significance criterion in the Regional Plan Update EIS (2012), the Regional Transportation Plan/ Sustainable Community Strategy EIR/EIS (2012), the Douglas County - South Shore Area Plan IEC (2013), the City of South Lake Tahoe - Tourist Core Area Plan (2013), and the City of South Lake Tahoe - Tahoe Valley Area Plan IEC/IS/MND (2015).

No other adopted VMT standards or regulatory requirements exist; development of an alternative VMT standard is within the policy discretion of the TRPA Governing Board. Placer County has not adopted a significance threshold with respect to VMT.

Some comments suggest that TRPA should adopt a more aggressive VMT reduction target (i.e., a lower VMT standard), or that the EIR/EIS should use a significance criterion that is some level below the adopted VMT threshold standard. More aggressive VMT reduction targets, in general, may have merit as an environmental improvement strategy. However, a revision to the adopted VMT threshold standard or the development of a new alternate standard of significance against which regional and sub-regional planning efforts should be evaluated is a policy decision that would need to be made by the TRPA Governing Board. That option, however, does not render inappropriate use of the existing standard, especially when it has consistently been used in the evaluation of similar planning efforts since the formation of TRPA.

As described above, the Draft EIR/EIS clearly identified the significance criteria related to VMT, which is appropriately based on the only adopted VMT standard in the region. This is consistent with the approach used in other recent regional and sub-regional planning efforts in the Tahoe Basin. The suggestions for the development of more stringent or alternate VMT standards are noted for consideration by the TRPA Governing Board and the county Board of Supervisors during future priority setting and work planning efforts.

LAND USE CONSIDERATIONS IN THE TRANSPORTATION ANALYSIS

Some comments suggest that the transportation analysis double-counted VMT reductions associated with the Regional Plan. Other comments suggested that the transportation analysis simply deferred to the regional transportation analysis in the Regional Plan Update EIS or did not reflect the differences between the land use patterns that would result from the Area Plan and the land use patterns that were assumed to occur in the Regional Plan Update EIS.

As described on page 10-13 of the Draft EIR/EIS: “Estimates of land uses, including assumptions about the location and extent of existing and new residential, commercial, and tourist development, are fundamental to the transportation analysis. The Regional Plan Update EIS (TRPA 2012) established limits on the amount and type of development that could occur under the Area Plan alternatives, and it analyzed complete build-out of the Tahoe Basin by the year 2035. The Area Plan alternatives have a planning horizon of approximately 20 years, which also approximately equates to the year 2035. Therefore, the 2035 land use assumptions for the adopted Regional Plan Update alternative (Regional Plan Update Alternative 3) from the Regional Plan Update EIS were used as the starting point to develop land use scenarios for the Area Plan alternatives. The Draft EIR/EIS goes on to describe how “the Area Plan alternatives include policies and standards that could result in variations in land use patterns that would be different than those analyzed in the Regional Plan Update EIS” (Draft EIR/EIS page 10-13).

To evaluate the transportation effects of the Area Plan alternatives, the TRPA TransCAD Transportation Demand Model was used to evaluate the effects of specific land use scenarios that would result from

implementation of the Area Plan alternatives. This model accounts for the existing land uses and roadway network within the Plan area and other portions of the Tahoe Basin. While the land use assumptions from the Regional Plan Update EIS served as a starting point, these were modified to reflect the specific policies, ordinances and zoning included in the Area Plan alternatives. The modeling did not tier from the Regional Plan Update EIS or double count VMT reductions that were already assumed to occur under the Regional Plan. Instead, the analysis conducted a new model run that evaluated the land use patterns that would result from implementation of the specific policies, zoning, and ordinances included in the Area Plan alternatives. The VMT reductions anticipated to occur from implementation of the proposed Area Plan are not in addition to those projected to occur in the Regional Plan EIS. Rather, they reflect a refinement of the VMT reductions projected in the Regional Plan EIS.

Appendix G-1 of the Draft EIR/EIS describes the differences between the Regional Plan Update EIS land use scenarios and the land use scenarios evaluated in the Area Plan transportation modeling. As noted in Appendix G-1, the Regional Plan EIS land use scenario was updated to reflect development that has occurred since the adoption of the Regional Plan. Because the land use scenarios reflect build out of the Plan area, a list of proposed or reasonably foreseeable projects within the Plan area was review to determine if any foreseeable projects were not already accounted for in the Regional Plan build out assumptions. This review identified the proposed Brockway Campground as the one reasonable foreseeable project in the Plan area that was not already reflected in the Regional Plan land use assumptions.

As described on page 1 of Appendix G-1, “to reflect this project, 2,200 Persons-At-One-Time (PAOT) allocations were added to the traffic analysis zone (TAZ) that contains the project site. This reflects 4 PAOTs per proposed campsite, consistent with TRPA Code requirements for the allocation of PAOTs. This project could occur under any alternative, including the no-project alternative, so the PAOTs were added in the same way in the 2035 buildout scenario for each alternative.” Notably, since the preparation of the Draft EIR/EIS, the Brockway Campground applicant and property owner entered into an agreement to sell the property to the U.S. Forest Service for permanent protection as open space (see Sacramento Business Journal 2016).

Other differences between the Area Plan and Regional Plan land use scenarios include specific assumptions to reflect the proposed Tahoe City Town Center boundary revision, conversions of CFA to TAUs, allowances for second residential units on parcels less than one acre, and permissible uses within specific town center zoning districts. The land use scenarios also reflected the specific redevelopment proposals included in the Tahoe City Lodge alternatives and the Kings Beach Center Design Concept. The land use scenarios did not include specific assumptions to reflect proposed provisions that would allow non-contiguous project areas because this provision would affect the design of individual projects, but would not affect the total development potential or trip generation that could occur within each town center. Similarly, TRPA Code amendments approved since the adoption of the Regional Plan were reviewed to determine if they would affect land use patterns. The TRPA Code amendments approved since the 2012 Regional Plan was adopted would affect the process for transferring land coverage, releasing residential allocations to local jurisdictions, and converting between commodity types. These Code amendments, however, would not affect the total amount or location of development that could occur in the region, and they would not alter the land use assumptions included in the Regional Plan land use scenarios. Therefore, it was not necessary to alter the land use assumptions to reflect recent code amendments.

As described above, the transportation analysis in the Draft EIR/EIS did not double count the VMT reductions associated with the Regional Plan, nor did it simply apply the Regional Plan land use scenarios without reflecting changes that have occurred since 2012 or changes that would result from implementation of the Area Plan alternatives. Instead, the Draft EIR/EIS appropriately modeled the transportation effects of the Area Plan alternatives based on the best available current information using land use assumptions that reflect the specific Area Plan proposals, which are documented in Appendix G-1 of the Draft EIR/EIS.

CUMULATIVE VMT ANALYSIS

Several comments question the cumulative VMT analysis. In particular, some comments suggest that the Draft EIR/EIS did not consider VMT that could be generated within the Plan area by buildout of the proposed Brockway Campground project, or VMT associated with development of areas outside of the Lake Tahoe Basin including the Village at Squaw Valley Specific Plan and the Martis Valley West Parcel Specific Plan.

As described above, the proposed Brockway Campground site is within the Plan area and could be implemented under any of the Area Plan alternatives. The VMT associated with the Brockway Campground is reflected in the analysis of buildout of each Area Plan alternative in Chapter 10 of the Draft EIR/EIS.

The Draft EIR/EIS provides a cumulative analysis of VMT in Chapter 19, beginning on page 19-14. The Draft EIR/EIS clarifies that the cumulative analysis considers VMT associated with development of areas outside of the Lake Tahoe Basin, stating that the cumulative analysis "...considers additional traffic increases that could occur as the result of growth outside of the Tahoe Basin, including Martis Valley, the Squaw Valley/Alpine Meadows area, and Truckee." (Draft EIR/EIS page 19-14).

Detailed methodologies for estimating cumulative VMT generated from buildout of areas outside the Tahoe Basin are provided in Appendix G-2 of the Draft EIR/EIS. Pages 3 to 4 of Appendix G-2 describe how the cumulative transportation analysis conservatively accounted for complete buildout of the Town of Truckee General Plan and Martis Valley Community Plan, based on the results of a separate TransCAD model maintained by the Town of Truckee.

Because no existing transportation model covers the nine-mile stretch of SR 89 between the Town of Truckee and the Plan area, an alternative methodology was used to estimate cumulative vehicle trips from projects in this area. The traffic volume estimates from draft CEQA documents for foreseeable projects within this area were summed to account for VMT that could be generated from cumulative development. This estimate reflected the vehicle trips from the Village at Squaw Valley Specific Plan Draft EIR, as well as trips that could occur from development of the Plumpjack Squaw Valley Inn, Palisades at Squaw, and Alpine Sierra Subdivision.

The VMT from the additional trips entering the Plan area at SR 267 and SR 89 was then calculated at an additional 12,616 VMT (within the Tahoe Basin) as a result of external trips entering the Plan areas from SR 267, and an additional 29,861 VMT (within the Tahoe Basin) as a result of external trips entering the Plan area from SR 89. Between the two external access points, a total of an additional 42,477 VMT on a peak summer day, was estimated to occur from cumulative buildout of areas outside the Tahoe Basin (see pages 2 to 6, and Tables D and F in Draft EIR/EIS Appendix G-2 for more information). This additional VMT from external development was in addition to the external trips already reflected in the TRPA TransCAD model, which account for general regional growth outside of the Tahoe Basin.

The additional VMT generated from cumulative buildout of areas outside the Tahoe Basin was added to the VMT estimates from Chapter 10, which reflected cumulative build out of the Plan area and other portions of the Tahoe Basin. The resulting cumulative VMT estimates are presented under Cumulative Impact 10-4 (cumulative vehicle miles traveled) on pages 19-17 to 19-18 of the Draft EIR/EIS. The Draft EIR/EIS determined that "under cumulative conditions with all alternatives VMT would remain below the TRPA regional VMT threshold standard of 2,030,938. Because cumulative VMT would remain below the adopted standard under all alternatives, the cumulative impact would be less than significant. Thus, the Area Plan or Lodge alternatives would not make a considerable contribution to a significant cumulative impact" (Page 19-18). It should also be noted that even if the cumulative VMT levels exceeded the regional VMT standard resulting in a significant cumulative effect, Area Plan Alternatives 1 (the proposed Area Plan) and 3 would not contribute to a significant cumulative impact because these alternatives reduce VMT from existing levels resulting in a beneficial effect.

As described above, the Draft EIR/EIS appropriately evaluated the cumulative VMT that could occur as a result of buildout the Plan area; other areas of the Tahoe Basin; and external areas including Truckee, Martis

Valley (including the Martis Valley West Parcel Specific Plan), and the SR 89 corridor (including the Village at Squaw Valley Specific Plan).

TRIP LENGTHS AND TRAFFIC COUNTS

Some comments suggest that the VMT analysis used traffic counts as a proxy for VMT, or inaccurately estimated 1981 VMT levels because the modeling assumed that trip lengths have not changed over time.

TRPA typically updates its TransCAD model in four- or five-year increments consistent with its Regional Transportation Plan Updates. As described above, in the transportation model and VMT threshold updates section, in some cases TRPA will use traffic counts as a proxy for VMT to generate annual VMT estimates between model updates. For example, the 2014 RTP Monitoring Report used this approach as an interim step between model updates. However, for the Draft EIR/EIS analysis, the TransCAD model was updated to reflect land use and transportation scenarios that would result from the Area Plan alternatives (see Draft EIR/EIS pages 10-13 to 10-14 and Appendix G-1). Traffic counts were not used as a proxy for VMT in the Draft EIR/EIS.

The 1981, 1987, and 1995 VMT modeling estimates representing the Tahoe Region VMT were compared to (or calibrated from) 27 traffic count stations maintained by Caltrans and NDOT. These 27 count stations were used consistently as a standard to calibrate the 1981, 1987, and 1995 models and VMT estimates. Between the 2006 and 2011 Threshold Evaluations, TRPA removed seven cordon station count stations to better discern the increase and or decrease in traffic volumes and visitation leading into the basin. The distribution of the 20 continuously utilized internal count stations were primarily selected to correlate with the population differences between the south shore and north shore (two-thirds – one third, respectively) and to account for those permanent count stations where traffic is counted continuously. Notably, this dataset represents the best indicator of traffic levels available throughout the Tahoe Basin and across the necessary years of analysis.

Trip Lengths are computed separately for each new model iteration based on the most current information with the TransCAD Tour Based Model and prior to that, the TranPlan Model. However, given the relative lack of change in the street network and land use patterns over time, trip lengths have changed very little as shown in the trip length outputs from the 2005, 2010, and 2015 TransCAD model runs, below.

2005	2010	2015
Resident Average= 5.87	Resident Average= 5.77	Resident Average= 5.78
Seasonal Resident =16.50	Seasonal Resident =16.41	Seasonal Resident =16.39
Overnight Visitor = 12.73	Overnight Visitor = 12.71	Overnight Visitor = 12.69
Day Visitor = 32.98	Day Visitor = 32.48	Day Visitor = 33.18
External Worker = 23.17	External Worker = 23.57	External Worker = 23.66
Thru Visitor = 32.63	Thru Visitor = 32.13	Thru Visitor = 32.14

The Draft EIR/EIS appropriately modeled VMT that would result from each Area Plan alternative. Trip counts were used as a method to calibrate the model and estimate a 1981 VMT value. Trip lengths were accurately reflected and have changed very little over time. Therefore, the VMT analysis did not use trip counts as a proxy for VMT or inaccurately assume that trip lengths have not changed over time.

FUTURE ECONOMIC CONDITIONS

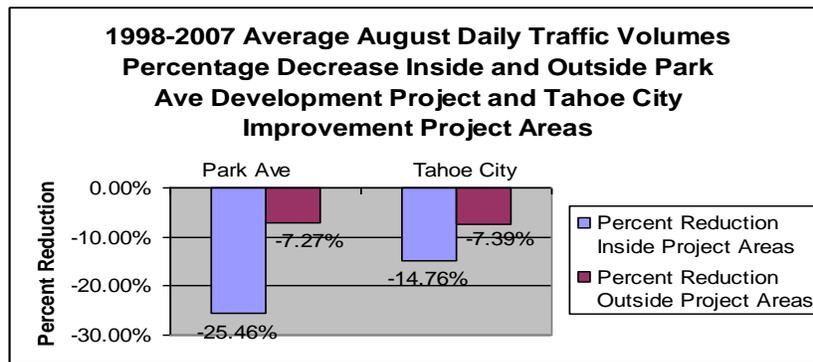
Some comments suggest that the existing baseline reflects an artificially low VMT level and that the transportation analysis did not account for potential increases in economic activity, the temporary effects of drought, or other changes in visitation that could increase future VMT.

As described above, the VMT analysis is based on a 2015 baseline. Other environmental review guidelines (e.g., CEQA Guidelines Section 15125, Environmental Setting) and judicial guidance on the subject of

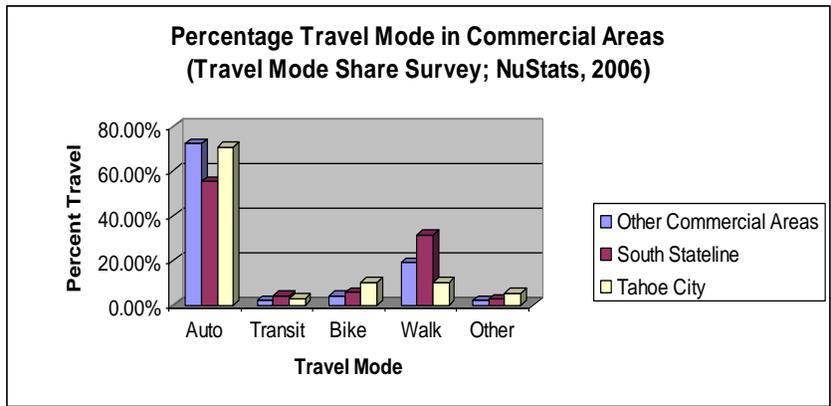
baseline have determined that the baseline against which a project’s impacts should be compared is generally existing conditions at the time of the NOP or at the time the analysis is commenced unless special circumstances warrant a modified baseline. There are not special circumstances related to transportation modeling in the case of the proposed project that warrant a modified baseline. Thus, use of existing conditions as baseline is appropriate. As noted above, the comments suggest that future increases in visitation rates could increase VMT. However, VMT has been on a decreasing trend since 1986 (Regional Transportation Plan, Figure 1-14). The overall decrease in VMT may be due to a wide variety of influences including reductions in population, reductions in school enrollment, increases in gas prices, reductions in gaming revenues and gaming employees, decreases in overnight (hotel/motel) stays, reductions in day-use visitors, and overall shifts away from driving. Attempting to make a prediction on all the future factors that would influence population and VMT would be speculative. The future year versions of the TRPA travel demand model take into consideration reasonably expected growth in population, school enrollment, employment levels, and overnight and day use visitors due to release of new allocations, as presented in Lake Tahoe Resident and Visitor Model Report (Parsons Brinckerhoff 2007).

Some comments indicate a belief that the recent drought may have reduced Tahoe area traffic volumes, and that current conditions do not reflect an accurate baseline. However, there is no evidence that the recent drought has reduced traffic volumes. It is also possible that the drought has increased visitation to Lake Tahoe, because Lake Tahoe provides more public recreational access to water than other large lakes in the region (such as the foothill reservoirs), during drought conditions. In the absence of conclusive data about the effects of the recent drought, it would be highly speculative to manipulate the actual baseline conditions to account for the effects of the drought.

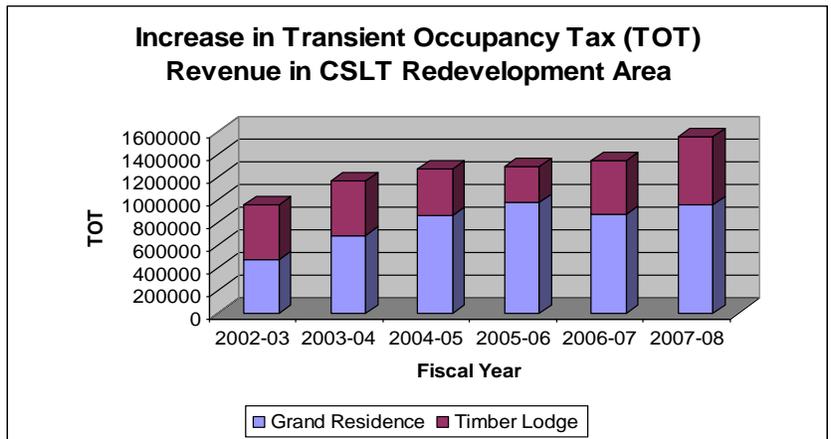
In addition, evidence suggests that the type of increased economic activity likely to result from the proposed Area Plan (i.e., concentrated redevelopment of pedestrian-oriented town centers) would further reduce VMT rather than increase it. Two examples of the type of economic improvements likely to result from the proposed Area Plan include the Tahoe City Urban Improvement Project (2000) and the Park Avenue Development Project (2001). Empirical evidence suggests that the two developments have resulted in increased economic activity and reduced vehicle trips as shown in the following graphics.



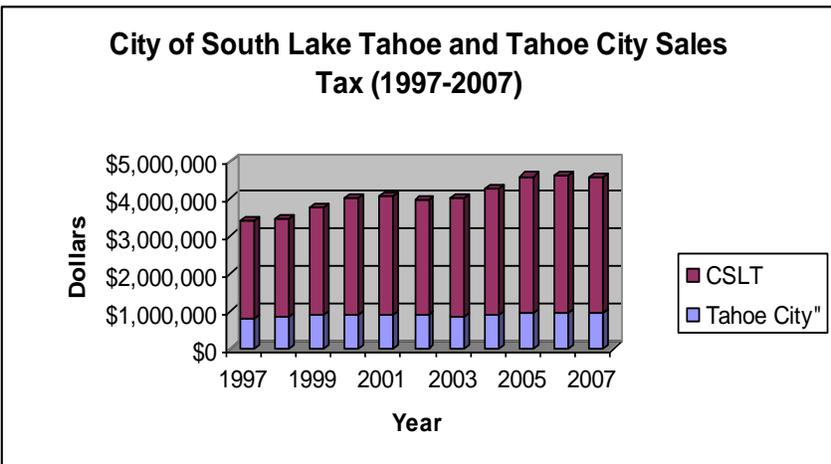
Source: Caltrans 2007



Source NuStats 2006



Source City of South Lake Tahoe budget FY 08-09



Source: City of South Lake Tahoe 2008, Placer County 2015

As described above, the Draft EIR/EIS appropriately reflects baseline conditions. The analysis includes realistic economic growth assumptions. Additional VMT increases that could result from increase economic activity or other factors are not included because those increases in VMT would be speculative and contrary to the available evidence.

REQUESTS FOR LOCALIZED VMT ANALYSIS

Some comments suggest that the EIR/EIS should include a local-scale analysis of VMT that would identify the vehicle miles traveled within the Plan area or portions of the Plan area, such as the Tahoe City Town Center. The comments suggest that VMT within the Plan area could have a different environmental effect than VMT occurring in other areas of the Tahoe Basin. Comments that question whether the VMT analysis accurately reflected local conditions within the Plan area are addressed above in the section titled land use considerations in the transportation analysis.

The Draft EIR/EIS evaluates the localized transportation effects of the Area Plan alternatives in Chapter 10. It discloses forecasted traffic volumes on individual roadway segments and intersections within the Plan area (see Draft EIR/EIS Tables 10-4 and 10-5). The Draft EIR/EIS evaluates the effects of the Area Plan alternatives on the level of service of key roadway segments (Draft EIR/EIS pages 10-16 to 10-21), and key intersections (Draft EIR/EIS pages 10-35 to 10-38). It also evaluates the effects of the Area Plan alternatives regarding the capacity of specific local residential streets within the Plan area (Draft EIR/EIS pages 10-32 to 10-34) and the effects on parking conditions, transit service, bicycle and pedestrian use, and transportation-related hazards within the Plan area (Draft EIR/EIS pages 10-41 to 10-49). These impacts are analyzed at the geographic scale at which the impact would occur (i.e., across the Plan area, or at the local roadway segment or intersection).

In contrast, VMT is a 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 Basin). The Draft EIR/EIS analyzes the effects of the Area Plan alternatives on VMT at that scale (where these impacts would occur), consistent with the adopted standard (See Draft EIR/EIS pages 10-38 to 10-40).

It would be possible to use the TransCAD model to identify the proportion of VMT that would occur within a specific local area. However, this analysis would not provide meaningful information to evaluate the policies, programs, and ordinances included in the Area Plan alternatives because the VMT within a specific area (such as the Kings Beach core) is generated by a myriad of trips with differing origins/destination. The TransCAD model accounts for trip origins and destinations that occur within and outside of the region. As a result, an analysis of VMT within local areas could underestimate the VMT impacts of the Area Plan because it would not reflect VMT that is generated by land uses in the Plan area but that occur outside the Plan area (e.g., a trip from Kings Beach to Incline Village). Conversely, an analysis of the VMT within the Plan area could overestimate VMT associated with the Area Plan alternatives because it would include VMT from through trips that are not affected by land uses or policies in the Area Plan alternatives (e.g., trips from Incline Village to Truckee).

In addition, the only available threshold is for basin-wide VMT. No threshold has been developed to determine whether VMT within a particular sub-area is significant. Thus, even if the sub-area VMT were reported, that number would not alter the analysis, and would not result in making an additional determination of significance. Rather, the number would simply provide additional information, without any impact on the analysis of the impacts of the Area Plan

The Draft EIR/EIS appropriately evaluated the VMT effects of the Area Plan alternatives at the scale at which those effects would occur (i.e., the Lake Tahoe Basin), which is consistent with the adopted standards for VMT. An analysis of the proportion of VMT that could occur within specific portions of the Plan area was not included because it would not provide meaningful information to assist in evaluating the Area Plan alternatives.

LOS BACKGROUND AND FINDINGS IN THE DRAFT EIR/EIS

While VMT measures the total distance travelled by motorized vehicles during a peak summer day, LOS measures the delay experienced at a specific intersection or roadway segment. Thus, VMT is a measure of

the distance travelled via automobiles and overall use of the roadway network, and LOS is a measure of how quickly that traffic can move through individual roadway segments or intersections.

As described above, TRPA has adopted a threshold standard for VMT that must be attained and maintained as required by the Compact. In contrast, TRPA has not adopted a threshold standard for LOS. Instead a LOS policy is included in the Transportation Element of the Regional Plan (T-10.7) as well as Policy 3.A.7 of the Placer County General Plan (see Draft EIR/EIS pages 10-1 to 10-4). To reflect the worst-case scenario, the Draft EIR/EIS analyzes LOS for the peak-hour period for the busiest day of the year (a Saturday in August), and compares that LOS to the more stringent of TRPA and county LOS policies for specific roadway segments or intersections.

The Draft EIR/EIS analyzes the Area Plan alternatives effects on roadway LOS on pages 10-16 to 10-32, and the effects on intersection LOS on pages 10-35 to 10-36.

With respect to the proposed Area Plan (Alternative 1), the Draft EIR/EIS found that buildout of the Plan area would result in average daily trip volumes increasing by an average of approximately 2.8 percent along SR 28. The analysis found that this increase in daily trips “would degrade the LOS on SR 28 between the Wye and Grove Street in Tahoe City from an acceptable LOS E (LOS E for 4 hours per day or less) in the westbound direction to an unacceptable LOS E (LOS E for 5 hours or more). In the eastbound direction, although the peak-hour traffic volume would decrease, it would continue to operate at an unacceptable LOS F” (Draft EIR/EIS page 10-17).

The Draft EIR/EIS determined that the proposed Area Plan would result in a significant impact because the LOS on SR 28 in Tahoe City would exceed the TRPA policy. While the proposed Area Plan would result in a significant impact related to roadway LOS, it would reduce the average daily trip volumes along SR 28 when compared to the no project alternative (Alternative 4), and would therefore result in better roadway LOS than the no project alternative (see Draft EIR/EIS tables 10-5 and 10-6).

With respect to intersection LOS, the Draft EIR/EIS found that with buildout of the Plan area under the proposed Area Plan (Alternative 1), the SR 28 and Grove Street intersection, which currently exceeds the applicable LOS, would continue to exceed the applicable levels in the policy and delay times would increase. All other study intersections would continue to operate at acceptable LOS levels. The Draft EIR/EIS determined that the proposed Area Plan would result in a significant impact because it would exacerbate an existing unacceptable LOS level at one intersection.

The Draft EIR/EIS analyzed the cumulative effects of the Area Plan alternatives in chapter 19 (Draft EIR/EIS pages 19-14 to 19-17). As described under the section titled cumulative VMT analysis, above, the cumulative analysis modeled build out of the Plan area, the remainder of the Tahoe Basin, and nearby areas outside of the Tahoe Basin including Martis Valley, Truckee, and the Squaw/Alpine Meadows area. The cumulative analysis found that the proposed Area Plan (Alternative 1) would make a considerable contribution to a cumulatively significant impact related to the same roadway segment and intersection discussed above.

PROPOSED CHANGE IN LOS STANDARD

Some comments suggested that policy T-P-6 in the proposed Area Plan was not analyzed or would result in significant impacts.

The proposed Area Plan (Alternative 1) includes Policy T-P-6, which states “Maintain consistency with Level of Service (LOS) and quality of service standards identified in the Regional Transportation Plan (RTP), with the exception of intersections and roadway segments within the town center boundaries where LOS F is acceptable during peak periods. The RTP allows for possible exceptions to the LOS standards outside the town center boundaries when provisions for multi-modal amenities and/or services (such as transit, bicycling and walking facilities) are incorporated and found to be consistent with Policy T-10.7 of the RTP.”

As described in the Draft EIR/EIS, “this policy, in combination with proposed multi-modal improvements, is intended to promote increased use of non-automobile transportation modes” (Draft EIR/EIS page 10-17). As described above, LOS is a measure of how quickly traffic can move through the roadway system. In other words, LOS is a comparison of traffic volume to roadway capacity. Because roadway and intersections within the Plan area already operate at unacceptable LOS, attainment of the existing LOS standards may require an increase in roadway capacity (e.g., additional travel lanes, intersection widening, signalization) or increasing use of alternative modes of transportation (i.e., reducing the number of cars using the roadway system).

However, while there are those who disagree with the change in policy, Placer County and TRPA have concluded that increases in roadway capacity would be inconsistent with the Regional Transportation Plan and Regional Plan because they would also serve as an incentive for visitors and residents to use private automobiles instead of using alternative travel modes. As described on page 3-6 of the Draft EIR/EIS, one of the goals of the Area Plan is to “enhance all modes of transportation and mobility within the plan area.” The change in the applicable LOS standard is intended to reflect this goal by maintaining existing roadway capacities and encouraging residents and visitors to use alternative modes of transportation.

Although final guidelines implementing the legislation are yet to be adopted, SB 743, signed into law on September 27, 2013, started a process that, among other things, eliminates auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice are necessary to more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. So, while Area Plan Policy T-P-6 does not eliminate the LOS standard, it does acknowledge that delay-based standards can interfere with other important environmental goals.

The Draft EIR/EIS analyzes the effects of the change in the LOS standard on page 10-17. The analysis notes that the change in the LOS standard would not change the actual LOS of intersections and roadway segments in the Plan area. It also notes that the change in the LOS standard would not change project-level mitigation requirements, which are based on the size of proposed projects and the trips generated by the project, not by the LOS that would result from implementation of the project. Thus, the proposed change in LOS standards was appropriately analyzed in the Draft EIR/EIS.

EXISTING PROGRAMS AND PROJECTS THAT WILL IMPROVE LOS

Several comments questioned the adequacy of mitigation measures included in the Draft EIR/EIS to address the significant impacts related to LOS. The mitigation measures proposed in the Draft EIR/EIS are in addition to existing programs and projects that are intended to improve LOS in the Plan area. These existing programs and projects are described below to provide context for the discussion of LOS mitigation measures included in the EIR/EIS, and the benefits of these programs were not fully reflected in the Draft EIR/EIS LOS analysis. It should be noted, that these existing programs and projects are also intended to reduce VMT. The existing programs and projects include the following:

The **Kings Beach Commercial Core Improvement Project** changed the auto-dominated section of SR 28 between Secline Ave and Beaver Street to a pedestrian and bicycle friendly corridor including sidewalk upgrades, bicycle lanes and roundabout intersections. The project is scheduled to be completed in the fall of 2016

The **Fanny Bridge Community Revitalization Project** provides an enhanced facility to improve integration of the transit center into the heart of Tahoe City, to enhance the multi-modal function of the mixed-use center. The roadway project will incorporate a “bypass” roadway to the Fanny Bridge area; allowing Fanny Bridge and the adjoining roadway to become more user friendly for pedestrians, bicyclists and transit. New roundabouts are planned at the Tahoe City Wye and at both ends of the new “bypass” segment which will

connect SR 89 north of Tahoe City to SR 89 south of the Transit Center. In addition, the project provides bike lanes, sidewalk connections as well as multi-use trail improvements.

The Placer County Tahoe Region **Capital Improvement Program** (CIP) currently identifies transit capital costs for two additional buses for service expansion on SR 267. Additional capital projects, adaptive traffic management and traffic flow improvement projects, which aid peak hour LOS, may be considered for inclusion in an update of the CIP after adoption of the Area Plan.

In April 2016, Placer County adopted the **Tahoe Truckee Area Regional Transit Systems Plan** (TART Systems Plan) which provides a framework for expanding transit service and consolidation with other transit services. Placer County has delivered a level of transit improvement, service, and coordination in excess of the requirements that govern local public transit; and continues to look for opportunities to enhance and expand transit service. The plan identifies priority transit improvements and reasonably foreseeable funding sources, including local, state, and federal funding sources; and private funding from development mitigation via the County Service Area Zone of Benefit (ZOB). It is anticipated that the plan will encourage more ridership into the future.

Placer County and TRPA signed a **Joint Statement of Regional Transit Principles** agreement in the summer of 2016. The agreement serves to further outline the priorities and principles leading to the development of a sustainable public transportation system in the Lake Tahoe Region which will fulfill the policies and objectives of the Tahoe Metropolitan Planning Organizations' (TMPO) Regional Transportation Plan. The principles of the agreement focus on making transit a priority mode choice, enhancing partnerships, improving the environment, creating route choices, supporting change, and fostering contributions by out-of-Basin development to support the regional transit plan.

The **Tahoe City Mobility Plan**, funded by a grant from TRPA, was finalized in June of 2016. A mobility study focused on existing mobility conditions, as well as alternatives and community preferences for pedestrian and bicycle improvement to the Tahoe City Town Center. The recommended enhancements from the study are incorporated in the Area Plan (Area Plan, Part 5 Transportation Plan). In addition, a Pedestrian and Bicycle Road Safety Audit was performed which focused on key issues affecting pedestrian and bicycle safety and mobility along SR 28 and recommended short-term and long-term improvements. These recommendations have been incorporated in the Tahoe City Mobility Plan and into the Area Plan for implementation.

Many recent documents have identified the limitations and potential for public and private parking within the town center areas of Tahoe City and Kings Beach. The **Tahoe City Mobility Plan and North Tahoe Parking Study** serve as a basis for development of future parking strategies in these areas. Way-finding signage programs are currently being implemented with the Kings Beach Commercial Core Improvement Project and with the Fanny Bridge Community Revitalization Project. In addition, wayfinding guidelines have been developed by the Resort Association to support development of a coordinated wayfinding signage program to enhance awareness of alternative transportation modes including transit, pedestrian, and bicycle facilities.

REVISIONS TO THE AREA PLAN TO IMPROVE LOS AND VMT

In response to public comments on the proposed Area Plan that was available for review along with the Draft EIR/EIS, Placer County and TRPA have revised the proposed Area Plan to include additional policies that are intended to improve LOS, consistent with the intent of the Area Plan and Regional Plan. These policies would also contribute to additional reductions in VMT. The additional policies include the following:

- ▲ **Policy T-P-10:** Collaborate with Caltrans to develop adaptive traffic management strategies for peak traffic periods at Basin entry/exit routes of SR 267 and SR 89 which support the TRPA Regional Transportation Plan.

This policy would promote adaptive traffic management strategies that would help to alleviate congestion on Tahoe Basin entry and exit routes during peak periods, when the LOS on these routes are at their worst. Adaptive traffic management strategies could include approaches such as variable traffic signal timing that responds to actual traffic conditions, or temporary changes to lane configurations to increase capacity in one direction in response to demand.

- ▲ **Policy T-P-11:** Explore future modification to the Placer County Trip Reduction Ordinance which would expand requirements for Transportation Demand Management (TDM) plans within the Tahoe Basin which would include measures that reduce private automobile use.

This policy would encourage future expansion of an existing Placer County ordinance that requires certain employers to implement incentives and other measures that encourage employees to use forms of transportation other than private automobiles.

- ▲ **Policy T-P-12:** In an effort to reduce peak-period vehicle trips and improve LOS, future development project proposals which will employ between 20 and 100 employees and/or include tourist accommodation or recreational uses will be required to submit to Placer County a Transportation Demand Management Plan (TDM) upon Development Review.

This policy would expand upon existing requirements for the preparation of TDMs, which currently apply to projects that employ 100 or more employees. Smaller projects and those that generate trips associated with tourism would also be required to prepare TDMs.

- ▲ **Policy T-P-18:** Explore parking management strategies in town centers that support the TRPA Regional Transportation Plan and which would alleviate circulating vehicle trips associated with parking availability. Strategies could include consideration of dedicated parking circulators during peak periods, new parking and mobility infrastructure, and wayfinding signage. Wayfinding signage for parking facilities should be incorporated into a comprehensive program for multiple modes.

This policy would encourage drivers to park once and use alternate forms of transportation to get around a town center. It would also make efficient use of available parking spaces and make it easier for drivers to find available parking. This would reduce traffic associated with drivers who are searching for available parking.

- ▲ **Policy T-P-34:** Implement safety for pedestrian and bicycle routes and maximize visibility at bicycle, pedestrian and vehicle conflict points through increased safety signage, sight distance and facility design.

This policy would encourage additional bicycle and pedestrian use by improving safety and reducing conflicts with vehicles. Increased bicycle and pedestrian use could decrease traffic as a higher proportion of travelers use these no-motorized transportation modes.

- ▲ **Policy T-P-37:** Develop a coordinated wayfinding signage program to enhance awareness of alternative transportation modes including transit (TART), pedestrian and bicycle facilities. The wayfinding program should also include parking management strategies, see T-P-16 above. Wayfinding signs should be consistent within all areas of the Plan to provide clear recognition in congested periods.

This policy would encourage additional transit, bicycle, and pedestrian use by increasing travelers' awareness of the availability of these alternative modes. Increased transit, bicycle, and pedestrian use could decrease traffic as a higher proportion of travelers use these alternative transportation modes.

Taken together, these additional policies would improve LOS to the extent that they are implemented. These policies would reduce the environmental impacts associated with the version of the proposed Area Plan that was evaluated in the Draft EIR/EIS. To be conservative, this EIR/EIS does not estimate LOS improvements that would result from implementation of the policies. Thus, the significance determinations in the Draft

EIR/EIS are not changed by the addition of the policies above. However, to the extent that these policies are implemented, they would improve LOS which would mean that the Draft EIR/EIS overestimated LOS impacts.

MITIGATION MEASURES FOR LOS IMPACTS

Some comments question the effectiveness of mitigation measures recommended for LOS impact, or suggest they are inadequately described. The Draft EIR/EIS analyzes the proposed Area Plan's effects on roadway LOS on pages 10-16 through 10-21, and the effects on intersection LOS on pages 10-35 through 10-36. The Draft EIR/EIS prescribed three mitigation measures to address the significant impacts on roadway and intersection LOS (described in the Draft EIR/EIS on pages 10-30 through 10-31):

- ▲ Mitigation Measure 10-1a: Construct pedestrian crossing improvements at the Grove Street/SR 28 intersection;
- ▲ Mitigation Measure 10-1b: Establish a County Service Area Zone of Benefit to fund expansion of transit capacity; and
- ▲ Mitigation Measure 10-1c: Payment of traffic mitigation fees to Placer County.

Each of these mitigation measures was reviewed in light of the comments received. Where applicable, the text of mitigation measures has been revised to clarify the intent and requirements of the mitigation measure. Specific mitigations that were suggested in comments have been carefully reviewed. Several comments suggested mitigation measures that were determined to be feasible. These additional mitigation measures have been included in this Final EIR/EIS. In some cases, additional mitigation measures were proposed in comments, but determined to be infeasible. The rationale as to why those mitigations are not feasible is provided in the response to those individual comments. The additional mitigation measures include an expansion of Mitigation Measure 10-1b beyond the requirements outlined in the Draft EIR/EIS, as well as the inclusion of the following additional mitigation measures:

- ▲ Mitigation Measure 10-1d: Expand requirements for transportation demand management plans; and
- ▲ Mitigation Measure 10-1e: Prepare and implement a comprehensive wayfinding program for parking and multi-modal transportation
- ▲ Mitigation Measure 10-1f: Long-term monitoring and adaptive management of mobility strategies
- ▲ Mitigation Measure 10-1g: Four-year review of vehicle trips and mobility strategies
- ▲ Mitigation Measure 10-1h: Implement TRPA's Congestion Management Process

In response to comments, the text of Mitigation Measure 10-1a is revised to provide additional clarity on the timing of this mitigation measure. Mitigation Measure 10-1a requires the construction of pedestrian crossing improvements at the Grove Street/SR 28 intersection. The revision specifies that the pedestrian crossing must be implemented within 3 years of adoption of the Area Plan. The revised text of Mitigation Measure 10-1a is provided in Chapter 2, and below:

Mitigation Measure 10-1a: Construct pedestrian crossing improvements at the Grove Street/SR 28 intersection

This mitigation measure applies to Area Plan Alternatives 1, 2, and 3.

As described above, pedestrian crossings, particularly near the SR 28/Grove Street intersection contribute to vehicular congestion and the existing unacceptable LOS conditions at the SR 28/Grove Street intersection. To reduce traffic delays on SR 28 through the Tahoe City Town Center during peak summer periods, Placer County shall construct a pedestrian activated hybrid beacon crossing at the

Grove Street and SR 28 intersection in Tahoe City within three years of adoption of the Area Plan. The Tahoe City Mobility Plan and the Proposed Area Plan already identify this pedestrian crossing as a needed improvement. Article 15.28.010 of the Placer County Code establishes a road network Capital Improvement Program. The payment of traffic impact fees funds the Capital Improvement Program for area roadway improvements, such as the hybrid beacon pedestrian crossing. The implementation of the hybrid beacon pedestrian crossing would consolidate pedestrian crossings, which would reduce the impacts of pedestrian crossings on LOS at the Grove Street/SR 28 intersection.

Mitigation Measure 10-1b requires the establishment of a county Service Area Zone of Benefit that would fund expansion of transit capacity. The mitigation measure in the Draft EIR/EIS required that the Zone of Benefit be designed to provide on-going annual funding sufficient to, at a minimum, provide four additional vehicle-hours of transit service per day throughout the winter season on each of three routes. Mitigation Measure 10-1b has been expanded to also require that the Zone of Benefit provide sufficient annual funding to provide 16 additional vehicle-hours of transit service per day throughout the summer season. In addition, the text of the mitigation measure has been revised to provide additional detail and clarity on how the Zone of Benefit would function. The revised text of Mitigation Measure 10-1b is provided in Chapter 2, and below:

Mitigation Measure 10-1b: Establish a County Service Area Zone of Benefit to fund expansion of transit capacity

This mitigation measure applies to Area Plan Alternatives 1, 2, and 3.

The key constraint to expanding transit capacity is the availability of ongoing transit operating subsidy funding, as discussed in the recently completed System Plan Update for the Tahoe Truckee Area Regional Transit in Eastern Placer County (LSC, 2016). While the proposed Area Plan includes Policy T-P-22 (“Secure adequate funding for transit services so that transit is a viable transportation alternative”), this does not identify a specific mechanism to assure expansion of transit services to address increased peak demand. To provide an ongoing source of operating funding as well as transit bus seating capacity, Placer County shall establish one or more County Service Area Zones of Benefit encompassing the developable portions of the Plan area. Ongoing annual fees would be identified to fund expansion of transit capacity as necessary to expand seating capacity to accommodate typical peak-period passenger loads during both summer and winter peak periods. At a minimum, this would consist of four additional vehicle-hours of transit service per day throughout the winter season on each of the following three routes: North Shore (North Stateline to Tahoe City), SR 89 (Tahoe City to Squaw Valley), and SR 267 (North Stateline to Northstar), as well as the expansion of transit fleet necessary to operate this additional service. In addition, ongoing annual fees would be sufficient to, at a minimum, provide 16 additional vehicle-hours of transit service per day throughout the summer season, as well as the expansion of transit fleet necessary to operate this additional service. The additional 16 vehicle-hours of transit service during the summer season would be provided on those routes that have the highest ridership and/or the lowest LOS conditions. Currently, SR 28 through Tahoe City has the highest ridership levels and lowest LOS. However, the county will determine the specific routes where additional transit service will be provided each year based on observed changes in ridership and LOS over time. Fees would be assessed on all future land uses that generate an increased demand for transit services, including residential, lodging, commercial, civic, and recreational land uses.

The new Zone of Benefit under the County Service Area would be established through action by the Board of Supervisors to fund increased public services within the Plan area. This is a very common means of funding the costs for expanded public services generated by development in California, though Zones of Benefit funding transit programs are relatively uncommon. In this case, the services to be funded would be expanded winter and summer TART transit services, and could also include capital expenses (such as additional buses). An Engineers Report is required under state law to identify the costs to be funded and the fee. Like traffic fee programs, fees are set on a “dwelling unit equivalent” (DUE) basis for various land use types, depending on the relative transit ridership generated by each type of land use. The total potential number of future development DUEs in the Plan area would be identified. The annual fee for each DUE would be calculated by dividing the annual costs of the

additional transit service by the total DUEs. The fee would then be applied to all future development that increases ridership (residential, commercial, lodging, etc.). The fee would be an annual ongoing fee that is collected as part of property tax billing. As funds are received, they would be kept in a separate account, which can only be used for the specified purposes. Fee levels would be indexed to the regional rate of inflation, increasing as costs increase and these fees would be collected indefinitely.

The actual amount of funding generated by the Zone of Benefit will depend on the actual level of development that occurs. Initially, when little development and little increased demand for transit has occurred, funds may be allowed to accumulate to a level at which they can be effectively used for the intended purpose. As expansion of existing transit service is relatively simple to implement in increments, the expansion of transit services funded through the Zone of Benefit can be expected to occur relatively soon and long before buildout of the Plan area. A good example of Zones of Benefit funding transit expansion can be found in the Martis Valley area. As a result of the Martis Valley Community Plan process, Zones of Benefit have been established by the Placer County Board of Supervisors for all subsequent developments over the past ten years, tied to the cost of expanding transit service and funding an additional bus purchase. These generate approximately \$40 per DUE per year. In initial years, funds were allowed to accumulate. More recently, as additional development has occurred, annual funding levels have risen and this source is now an important element of the recent expansion of TART's 267 Route to year-round service.

In addition to the revisions and expansions to Mitigation Measures 10-1a and 10-1b, five additional feasible mitigation measures have been identified and are hereby included in the Final EIR/EIS as Mitigation Measures 10-1d through 10-1h. Mitigation Measure 10-1d would expand existing TRPA requirements related to transportation demand management plans, so that more projects would be required to implement transportation demand plans. Mitigation Measure 10-1e would require the preparation and implementation of a comprehensive wayfinding program for parking and multi-modal transportation. Mitigation Measure 10-1f would require the periodic evaluation of the long-term success of the mobility strategies included in the Area Plan; and Mitigation Measure 10-1g would require a separate four-year review of traffic levels occurring within the Plan area, and it would require revised mobility strategies if actual vehicle trips exceed the levels projected in the Draft EIR/EIS. Mitigation Measure 10-1h would require that Placer County and TRPA prioritize additional mobility strategies consistent with TRPA's Congestion Management Process, which is under development and will include programmatic mitigation plans for future transportation projects. The text of the additional mitigation measures is provided below and in Chapter 2:

Mitigation Measure 10-1d: Expand requirements for transportation demand management plans

This mitigation measure applies to Area Plan Alternatives 1, 2, and 3.

To reduce peak-period vehicle trips and improve LOS, future development project proposals which will employ between 20 and 100 employees and/or include tourist accommodation or recreational uses will be required to submit to Placer County a Transportation Demand Management Plan (TDM) upon Development Review. The current threshold for preparation of a TDM or Employee Transportation Plan (TRPA Code Section 65.5.2.B) and compliance with the Placer County Trip Reduction Ordinance (Placer County Code 10.20) is 100 or more employees in a single location which applies to a very limited number of sites in the Plan area. This existing requirement also does not address trips that are generated from sources other than employee commutes, and in the Plan area, a large proportion of peak period trips are the result of tourist or visitor trips rather than employee trips.

Development of the expanded requirements for transportation demand management plans will consider trip sources and characteristics in the Plan area during peak periods. This mitigation measure will expand the requirements for transportation demand management plans with criteria that would require some employers with fewer than 100 employees to prepare such plans and implement through project mitigation for LOS impacts.

A menu of measures that could be included in transportation demand management plans is provided in TRPA Code section 65.5.3 and Placer County Code 10.20. These measures include but are not limited to:

- ▲ preferential carpool/vanpool parking;
- ▲ shuttle bus program;
- ▲ transit pass subsidies;
- ▲ paid parking; and
- ▲ direct contributions to transit service.

Mitigation Measure 10-1e: Prepare and implement a comprehensive wayfinding program for parking and multi-modal transportation

This mitigation measure applies to Area Plan Alternatives 1, 2, and 3.

Within one year of adoption of the Area Plan, Placer County will coordinate with partner agencies and organizations and ensure the preparation of a comprehensive wayfinding program for parking and multi-modal transportation. The program will identify specific improvements, responsible parties, and a timeline for implementation. The program will be consistent with Area Plan Policy T-P-37, which states “Develop a coordinated wayfinding signage program to enhance awareness of alternative transportation modes including transit (TART), pedestrian and bicycle facilities. The wayfinding program should also include parking management strategies, see Policy T-P-18. Wayfinding signs should be consistent within all areas of the Plan to provide clear recognition in congested periods.” The program would encourage additional transit, bicycle, and pedestrian use by increasing travelers’ awareness of the location and availability of these alternative modes. Wayfinding signage for parking facilities would be incorporated into the program and be consistent within all areas of the Plan to provide clear recognition in congested periods.

Mitigation Measure 10-1f: Long-term monitoring and adaptive management of mobility strategies

This mitigation measure applies to Area Plan Alternatives 1, 2, and 3.

Utilizing monitoring data continuously collected by various partner agencies, Placer County and TRPA will periodically assess the effectiveness of the long-term implementation of mobility strategies within the Plan area.

Mitigation Measure 10-1g: Four-year review of vehicle trips and mobility strategies

This mitigation measure applies to Area Plan Alternatives 1, 2, and 3.

Concurrent with TRPA’s four-year Area Plan recertification process, should actual vehicle trips surpass the Area Plan vehicle trips projected for travel into and within the Plan area, as shown in Chapter 19 of the Draft EIR/EIS for the Tahoe Basin Area Plan, the County and TRPA shall jointly revise mobility strategies in the Area Plan transportation chapter to address the increased vehicle trips. Placer County and its partners shall develop financing mechanisms to ensure implementation of new or modified mobility strategies within a feasible period of time. Placer County shall submit the revised Area Plan to TRPA for approval.

Mitigation Measure 10-1h: Implement TRPA’s Congestion Management Process

This mitigation measure applies to Area Plan Alternatives 1, 2, and 3.

Placer County and TRPA shall prioritize additional mobility strategies in a manner consistent with TRPA’s Congestion Management Process required by federal regulation (23 CFR 450.320) for urban

metropolitan planning organizations. TRPA's CMP is currently under development and will be implemented in 2017 in collaboration with local jurisdictions and public transit providers.

The revisions and expansion of existing mitigation measures, and implementation of additional mitigation measures, as described above, would improve roadway and intersection LOS during peak periods. However, even with the implementation of these additional and expanded mitigation measures, one intersection and one roadway segment would continue to operate at an unacceptable level, and the impacts would remain significant and unavoidable.

3.1.2 Master Response 2 – SEZ Restoration

Several comments suggest that the Area Plan should do more to make gains in SEZ restoration, noting that the only public SEZ restoration opportunities referenced in the Area Plan include Burke Creek and Pomin Park. One comment states that the Area Plan includes no regulatory changes or incentive programs to encourage the removal of coverage from, and restoration of, SEZs *within* town center boundaries where the SEZs are closest to the lake. The comment also expresses the opinion that the Area Plan should include additional measures beyond those already included in the Regional Plan to ensure that SEZ restoration is “significantly” accelerated. Other comments requested that the Area Plan expand the requirements for SEZ restoration within town centers. These comments relate to the Area Plan, rather than the Draft EIR/EIS, however a discussion is included below.

The Area Plan incorporates the Regional Plan policies intended to incentivize the removal of land coverage from SEZ areas and into high capability land within town centers. Because policies within the Regional Plan Update were designed to increase SEZ restoration, TRPA found the Regional Plan to be consistent with the TRPA SEZ threshold (TRPA 2012). This finding also applies to the Area Plan which implements the RPU policies. As described in Area Plan Section 8.2, “Implementation Plan,” the county’s SEZ restoration goals extend beyond the land transfer and SEZ restoration policies of the Regional Plan. Table 3-2, below, summarizes the projects completed by Placer County and partner agencies that would result in SEZ restoration within the Plan area.

Table 3-2 Summary of Placer County and Partner Agency SEZ Restoration Projects Within the Plan Area

Project Name	Responsible Agency	Summary of SEZ Restoration Component
Griff Creek Watershed Water Quality Project	Placer County	Reconnection of Griff Creek to its floodplain and restoration of surrounding SEZ habitats
Kings Beach Water Quality and SEZ Improvement Project	Placer County	Restoration of SEZ areas adversely affected by the built environment in Kings Beach, including Coon Creek and Griff Creek
Upper National SEZ	Private project	Restoration of one acre of Snow Creek
Burton Creek Linked Project – Antone Meadows to Lake Tahoe	California State Parks	Includes reconnection of the creek to the floodplain and restoration of SEZ areas
Lake Forest Creek Area Restoration	California State Parks	Restoration of the mouth of Lake Forest Creek, springs, and associated areas, possibly including the relocation of Pomin Park
Placer County Golf Course SEZ Restoration	Placer County, Tahoe City Public Utility District (TCPUD), Private	Wetland restoration on portions of the Tahoe City Golf Course
Truckee River Corridor Restoration	Placer County, Private	River corridor and SEZ habitat restoration
Tahoe Conservancy Riparian Wildlife and Upland Habitat Management	Tahoe Conservancy	Enhance and restore SEZ habitat throughout the region

Table 3-2 Summary of Placer County and Partner Agency SEZ Restoration Projects Within the Plan Area

Project Name	Responsible Agency	Summary of SEZ Restoration Component
Dollar Creek Restoration	Tahoe Conservancy	Remediate impacts from an abandoned dam and enhance SEZ vegetation
Sensitive Land Acquisitions	Placer County, Tahoe Conservancy, USFS	Secure funds to purchase private lands in sensitive areas
Kings Beach Library Relocation	Placer County	Relocate library from SEZ to high capability lands

In addition to the projects and programs described above, the proposed Area Plan includes Special Planning Areas (SPAs) specifically developed to encourage the restoration of SEZ habitats within urban area: the Tahoe City Western Entry SPA would require that future projects remove land coverage and restore SEZ areas within 30 feet of the Truckee River high water mark; the Tahoe City Gold Course SPA would require that projects restore disturbed SEZ at a ratio of 1 square foot of SEZ for every 1 square foot of the project area located within the SPA (regardless of land capability district [LCD]); and, the King Beach Entry SPA would require future projects to remove all development from the 100 year floodplain of Griff Creek and restore those areas.

While comments suggest otherwise, the proposed Area Plan does not rely solely on Regional Plan implementation policies and individual BMP implementation for SEZ restoration. The Area Plan supports many SEZ restoration projects and programs overseen by Placer County as well as partner agencies and private individuals. In addition, the Area Plan would establish SPAs specifically designed to restore and protect SEZs in urban environments, and Part 2.4 of the Area Plan has been revised to prioritize key SEZ restoration areas. SEZ restoration priority sites include: Griff Creek, Lake Forest (Pomin Park), and Burton Creek.

3.1.3 Master Response 3 – Affordable Housing

Numerous comments express the opinion that the Area Plan should more rigorously support development of affordable or workforce housing. Comments received were related to the Area Plan's secondary residential unit program, affordable housing in-lieu fees, and the enforcement of Tourism Occupancy Tax for vacation rental housing. While these comments do not address the adequacy of the Draft EIR/EIS, there are nevertheless responded to here.

SECONDARY RESIDENTIAL UNIT PROGRAM

With respect to the Area Plan secondary residential unit program, intended to result in a TRPA-certified local government housing program, some comments recommend that the program be expanded to include all residential parcels within the Plan area. The Area Plan Implementing Regulations Chapter 3.01 A. outlines provisions for secondary residences that would allow units to be constructed on parcels less than an acre in size if the units are located within one quarter mile of a main transit line or mixed-use zoning district. Application of this provision would result in potentially 12,139 private parcels gaining becoming eligible to develop a secondary residential unit. County parcel data indicates that there are 12,149 parcels in the Tahoe Basin that are under private ownership and less than one acre. Therefore, there are ten parcels within Plan area that would not gain a right to develop a secondary residential unit under the new provision. The number of secondary residential units that could be constructed would be limited by the number of residential allocations and bonus units that could be assigned from the TRPA pool. As described in Appendix G-1, it was assumed that an additional 5 percent of the new residential units would be secondary residential units. Alternative 3 analyzes a proposal to allow secondary residential units on all residential parcels and the impact for this alternative is considered less than significant.

Comments were also received that recommend that a provision be added to ensure residential occupancy and prohibit short-term occupancy of the secondary residential units, including vacation rentals or tourist

uses. The proposed secondary residential unit program includes a provision (Implementing Regulations Chapter 3.01.A), that states that the parcel must be deed restricted to not allow the secondary residential unit to be converted to a tourist use. Chapter 3.01.B of the Area Plan Implementing Regulations states that short term rental of a secondary residence (fewer than 30 consecutive days) is prohibited. The occupancy standard of 30 days or fewer is consistent with Placer County Code (Article 4.16) and California tenant law (Civil Code Section 1940), which defines 30 days or less as being transient in nature and subject to the state's hotel occupancy tax. Therefore, 30 days is considered the housing standard for determining residential occupancy and is also consistent with landlord/tenant month-to-month rental agreements. Accordingly, the proposed secondary residential unit program includes provisions that appropriately ensure residential occupancy of new secondary residential units.

Several comments suggested that no residential unit allocation should be required for secondary residential units that are deed restricted for residential use. Per TRPA Code of Ordinances 52.3.4, with a TRPA-certified local government housing program, secondary residential units that are deed restricted as affordable or moderate-income housing can access the available residential bonus units authorized by the Regional Plan instead of obtaining a residential unit allocation and development right; however, market rate secondary residential units are required to obtain a residential unit allocation and development right. Allowing market rate secondary residential units to access the TRPA Bonus Unit Program and residential bonus units is beyond the scope of the environmental analysis conducted for the Area Plan, and is not included in the Area Plan.

In response to comments requesting units be allowed on all residential parcels, and comments suggesting a provision be included in the secondary residential unit program that would require that units be deed restricted to ensure affordability, the Area Plan secondary residential unit program has been modified to include all residential parcels in Plan area and to include a provision that would require all new secondary residential units on parcels less than one acre be deed restricted as affordable or moderate-income housing. By modifying the Area Plan's secondary residential unit program to require all secondary residential units to be deed restricted for affordable or moderate-income housing, the program would not only ensure the units are addressing affordable housing needs in the Tahoe Basin, it would also allow property owners the opportunity to access the TRPA residential bonus unit pool. In summary, the revised Area Plan would allow secondary residential units on all residential parcels less than one acre, would require that the secondary units be deed-restricted to prohibit tourist uses or short-term rentals, and would require that secondary units be deed-restricted as affordable or moderate-income housing. Other requirements such as design standards and size restrictions outlined in the implementing ordinances would also apply.

In addition, some comments expressed concern regarding enforcement of secondary residential units to ensure that the units are not being used as or converted to tourist uses. By requiring secondary residential units to be deed restricted for affordability, TRPA Code of Ordinances 52.3.6. C requires the county to submit annual reports to TRPA documenting enforcement of the deed restrictions.

Finally, some comments expressed concern that adding secondary residential units would result in the number of residential units exceeding that analyzed in the Regional Plan Update (RPU) EIS. This statement is incorrect. Any bonus units that are assigned to secondary dwelling units would come from the TRPA Plan pool of bonus units. A total of 1,474 residential bonus units are remaining in the pool (TRPA 2012). The total extent of commodities, including bonus units, was evaluated in the RPU EIS in Chapters 3 and 4; the residential bonus units were identified in Tables 3.2-3 and 3.2-13 (pages 3.2-9 and 3.2-41 of the RPU EIS). For these reasons, the secondary residential unit program implemented under the Area Plan would not include additional residential units beyond those already contemplated in the RPU EIS as suggested in this comment.

AFFORDABLE HOUSING IN-LIEU FEES

Several comments expressed concern regarding the appropriateness of in-lieu fees as a way for projects to meet their affordable/workforce housing obligation. Comments questioned the adequacy of such fees to translate into actual construction of affordable housing. The county's 2013 Housing Element contains a section related to housing needs in the Tahoe Basin, with a goal to promote housing opportunities that meet

the specific needs of residents and workers in the Tahoe Basin. Policy C-2 of the Housing Element requires new development in the Sierra Nevada and Lake Tahoe areas to mitigate potential impacts to employee housing by housing 50 percent of the full-time equivalent employees (FTEE) generated by the development. This policy provides options for ways that projects can meet this obligation, which include: construction of on-site employee housing; construction of off-site employee housing; dedication of land for needed units; and/or payment of an in-lieu fee. The intent of this policy is to provide flexibility so that county housing staff can work with developers on site-specific solutions to mitigate project impacts to employee housing. The preferred method, particularly in larger projects, is to work with developers to construct units; however, there are conditions in which construction is not possible or desirable as a result of some local or site circumstance. Past projects in the Tahoe Basin have opted to use a variety of options and many projects have resulted in on-site and off-site construction of units. Table A-1 of the Placer County 2013 Housing Element provides a list of planned and approved affordable housing units in the Tahoe Basin. Also, in recent years, near-basin projects in Placer County have included the requirement to construct on-site affordable housing. The Village at Squaw Valley Specific Plan (VSVSP) proposes 300 employee units. The Martis Valley West Specific Plan (MVWSP), approved October 2016, includes 22 employee units, as well as in lieu fees. So, although the policy allows for in-lieu fees based on site-specific constraints, the record shows that the county has moved in the direction of requiring the actual construction of on-site units.

Funding for most affordable housing development is provided by a combination of private sector, nonprofit, and government programs. While affordable housing in-lieu fees may not appear to translate into actual construction of units on site, they are a mechanism by which local governments can collect funds and leverage such funds in a variety of ways to meet affordable housing needs. For example, affordable housing in-lieu fees in Placer County have been used for rental subsidies, low-interest loans for down payments, and in partnerships with non-profit housing developers to leverage other funding sources and construct units.

Some comments questioned how in-lieu fees are collected and earmarked for affordable housing. Affordable housing in-lieu fees are collected after project approvals, where developers pay a fee into the county's Housing Trust Fund, which is a segregated county account and dedicated funding source that has been established to increase and improve the supply of affordable and workforce housing in Placer County.

ENFORCEMENT OF TOURISM OCCUPANCY TAX FOR VACATION RENTAL HOUSING/EFFECT OF PEER-TO-PEER SHORT TERM RENTALS ON AVAILABILITY OF AFFORDABLE HOUSING

Several comments expressed concern over the county's enforcement of tourism occupancy tax (TOT) collection for vacation rentals of residential units in the Tahoe Basin. Placer County manages approximately 3,900 operators registered to collect and remit TOT on occupancy of overnight lodging within the unincorporated areas of Placer County. TOTs paid by visitors help fund initiatives that benefit the county as a whole including public safety, transportation, libraries, public parks, infrastructure improvements, and historical and environmental preservation projects. To ensure compliance with the TOT program, Placer County has recently contracted with a consultant to work on TOT discovery, analysis and compliance review, vacation rental discovery services, and franchise fee compliance review services.

Comments were also received that express concern regarding the effect of peer-to-peer short term rentals on the availability of affordable housing. The Placer County 2013 Housing Element identifies high housing vacancy rates for the unincorporated areas of the county and notes that this is due in large part to the predominance of vacation homes in the Tahoe Basin. In an effort to address affordable housing needs in the Tahoe area, the county partnered with the Town of Truckee, Nevada County, and the Tahoe Truckee Community Foundation to prepare the August 2016 Truckee North Tahoe Regional Workforce Housing Needs Assessment. This assessment also finds that residential vacancy rates are high in North Lake Tahoe and suggests it is driven by the high numbers of units left vacant for seasonal, recreational, or occasional use. The assessment also outlines policy options for consideration that would help to address affordable/workforce housing needs in the region. A few suggested policy changes outlined in the assessment have been incorporated into the Area Plan's secondary residential unit program and are described above. They include: the required use of deed restrictions of new secondary residential units to ensure housing affordability and availability for the lowest

income workforce households; the restrictions of short term use of secondary residential units to ensure residential occupancy; and the development incentive allowing access of the TRPA Bonus Unit Program and residential bonus units to construct secondary residential units that are deed restricted for affordability. The modifications to Area Plan's secondary residential unit program are intended to collectively respond to all comments received regarding affordable housing, including the effect of vacation rentals on the affordable housing stock in the Tahoe Basin.

3.1.4 Master Response 4 – Kings Beach Zoning and Shared-Use Path along Brockway Vista Avenue

Several comments were received expressing concern about the establishment of Mixed-Use zoning within the Kings Beach Town Center. The comments assert that this change would dramatically alter the character of the portion of the town center south of SR 28 and west of Secline Street. Under the existing Kings Beach Community Plan, this area includes Special Area #2, "East and West Entry Commercial Area" and Special Area #4, "Tourist Accommodation." Exhibit 5-1 on page 5-21 of the Draft EIR/EIS shows the zoning under the existing community plan overlain with the Mixed-Use districts proposed by the Area Plan (Exhibit 5-1 is included below as Exhibit 3-1 for ease of reference). Impact 5-2 of the Draft EIR/EIS included a change-in-use analysis of each community plan or PAS where the Area Plan proposed zoning changes. The tables showing the results of this analysis for the Kings Beach Town Center were included as Appendix B of the Draft EIR/EIS. To provide further clarification, Table 3-3 of this Final EIR/EIS lists the proposed use changes for the Mixed-Use areas in question.

Although the western lakefront portion of Kings Beach has been developed predominantly for residential use, the existing zoning under the Kings Beach Community Plan is broadly inclusive and characteristic of a Mixed-Use area. This can be shown by the "Continuing Uses" and "Eliminated Uses" columns in Table 3-3. These columns show the allowed uses under the current community plan, and identify whether these uses would be continued or eliminated under the Area Plan. The proposed Area Plan would eliminate 18 uses in the Lakeside Town Center Mixed Use Area (MU-LTC), and would add an additional six uses that are similar in nature to other currently allowed uses. For example, although the Area Plan would add "Retail Sales" as an allowed use, this use is similar to other commercial uses currently allowed such as "Building Materials and Hardware," "Eating and Drinking Places," and "General Merchandise Stores." In the same way, the proposed MU-LTC zoning would allow "Publicly Owned" or "Privately Owned Assembly and Entertainment," however these uses are similar in nature to "Local Assembly and Entertainment," which is a currently allowed use. Additionally, although the proposed Mixed-Use zoning would prohibit the construction of new single family dwellings along North Lake Boulevard, this would not affect existing single family homes.

As is the case under the Kings Beach Community Plan, the Area Plan allows a suite of uses that align with the vision of the Kings Beach Town Center, and tailors these uses to the specific Mixed-Use District proposed. These refinements would not result in the loss of established residential neighborhoods or add new uses that are not consistent with those currently allowed. Therefore, the establishment of Mixed-Use zoning within the Kings Beach Town Center would not alter the character of the portion of the town center south of SR 28 and west of Secline Street.

Many of the same comments concerned about Mixed-Use zoning also express opposition to the Brockway Vista lakefront shared-use path. The Brockway Vista boardwalk has been discussed as a component of the Kings Beach Gateway project for several years as was identified at a conceptual level in the Kings Beach Vision Plan. Although the Area Plan calls for the eventual construction of a boardwalk (Placer County 2015, p 151) and includes the conceptual location of the proposed boardwalk on Area Plan Figure 5-3 (Placer County 2015, p 124), the alignment of the path has not been finalized. The depiction of the alignment of the future Brockway Vista Boardwalk in the Area Plan is not intended to be precise, nor is the Draft EIR/EIS intended to analyze this path at a project level. The future construction of the boardwalk would require independent project level analysis and environmental review.

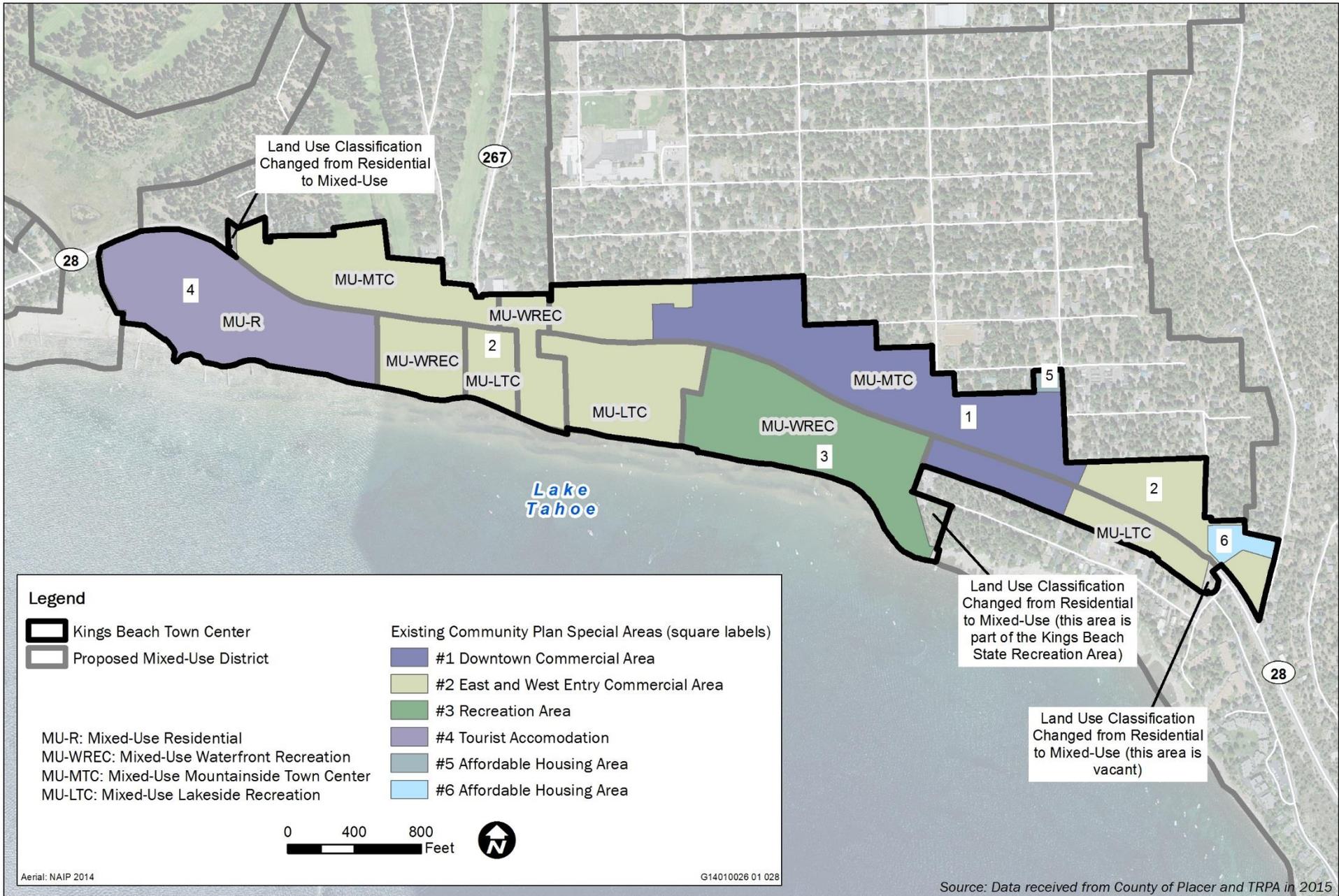


Exhibit 3-1

Table 3-3 Proposed Use Changes Within Select Portions of the Kings Beach Town Center

Proposed Mixed-Use District/Existing Designation	Continuing Uses	Eliminated Uses	New Uses
Mixed-Use Lakeside Recreation (MU-LTC)/ Special Area #2, West Entry Commercial Area	Multiple Family Dwelling Multi-Person Dwelling Employee Housing Bed and Breakfast Facilities Hotel, Motel, and other Transient Dwelling Units Timeshare Building Materials and Hardware Eating and Drinking Places Food and Beverage Retail Sales General Merchandise Stores Mail Order and Vending ² Nursery Outdoor Retail Sales Amusements and Recreation Services Outdoor Amusements Animal Husbandry Services ² Broadcasting Studios Business Support Services Financial Services Health Care Services Personal Services Printing and Publishing Professional Services Schools – Business and Vocational ² Vehicle Storage and Parking Collection Stations Cultural Facilities Day Care Centers/Preschools Government Offices Hospitals Local Assembly and Entertainment Local Post Offices Local Public Health and Safety Facilities Membership Organizaions ² Schools – College Transmission and Receiving Facilities Pipelines and Power Transmission Transit Stations and Terminals Transportation Routes Day Use Areas Beach Recreation Boat Launching Facilities Participant Sport Facilities Marinas Outdoor Recreation Concessions Recreation Center	Single Family Dwelling ¹ Residential Care Furniture, Home Furnishings, and Equipment Service Stations Sales Lots Small Scale Manufacturing Religions Assembly Schools – Elementary Schools – Secondary Social Service Organizations Threshold-Related Research Facilities Golf Courses Recreation Vehicle Park Riding and Hiking Trails Visitor Information Center	Retail Sales Privately Owned Assembly and Entertainment Professional Offices Publicly Owned Assembly and Entertainment Regional Public Health and Safety Facilities Snowmobile Courses
Mixed-Use Water Recreation (MU-WREC)/ Special Area #2, West Entry Commercial Area	Employee Housing Eating and Drinking Places Food and Beverage Retail Sales General Merchandise Stores Cultural Facilities Local Assembly and Entertainment	Single Family Dwelling ¹ Multiple Family Dwelling Residential Care Bed and Breakfast Facilities Hotel, Motel, and other Transient Dwelling Units	Retail Sales Privately Owned Assembly and Entertainment Publicly Owned Assembly and Entertainment

Table 3-3 Proposed Use Changes Within Select Portions of the Kings Beach Town Center

Proposed Mixed-Use District/Existing Designation	Continuing Uses	Eliminated Uses	New Uses
	Local Public Health and Safety Facilities Transmission and Receiving Facilities Pipelines and Power Transmission Transit Stations and Terminals Transportation Routes Day Use Areas Beach Recreation Boat Launching Facilities Participant Sports Facilities Marinas Outdoor Recreation Concessions and Recreation Center	Timeshare Building Materials and Hardware Furniture, Home Furnishings, and Equipment Mail Order and Vending Nursery Outdoor Retail Sales Service Stations Amusements and Recreation Services Outdoor Amusements Animal Husbandry Services Broadcasting Studios Business Support Services Financial Services Health Care Services Personal Services; Printing and Publishing Professional Services Sales Lots; Schools- Business and Vocational Small Scale Manufacturing Vehicle Storage and Parking Religious Assembly Collection Stations Day Care Centers/Preschools Government Offices Hospitals Local Post Offices Membership Organizations Schools - all Social Service Organizations Threshold-Related Research Facilities Golf Courses Recreational Vehicle Park Riding and Hiking Trails Visitor Information Center	Regional Public Health and Safety Facilities Developed Campgrounds Sport Assembly
MU-R (SA#4, Beach Street Tourist/Residential Area)	Employee Housing Eating and Drinking Placer Privately Owned Assembly and Entertainment Vehicle Storage and Parking Cultural Facilities Local Assembly and Entertainment Local Public Health and Safety Facilities Publicly Owned Assembly and Entertainment Transmission and Receiving Facilities Pipelines and Power Transmission Transit Stations and Terminals Transportation Routes Day Use Areas Developed Campgrounds Beach Recreation Boat Launching Facilities	Single-Family Dwelling ¹ Multiple Family Dwelling Multi-Person Dwelling Bed and Breakfast Facilities Hotel, Motel, and other Transient Dwelling Units Timeshare Outdoor Retail Sales Service Stations Outdoor Amusements Business Support Services Financial Services Health Care Services Personal Services Professional Offices Schools- Business and Vocational	Retail Sales Food and Beverage Retail Sales General Merchandise Stores Regional Public Health and Safety Facilities

Table 3-3 Proposed Use Changes Within Select Portions of the Kings Beach Town Center

Proposed Mixed-Use District/Existing Designation	Continuing Uses	Eliminated Uses	New Uses
	Participant Sports Facilities Marinas Outdoor Recreation Concessions Recreation Center	Secondary Storage Religious Assembly Collection Stations Day Care Centers/Preschools Government Offices Local Post Offices Membership Organizations Schools - All Threshold-Related Research Facilities Golf Courses Group Facilities Cross Country Ski Courses Recreational Vehicle Park Riding and Hiking Trails Rural Sports Visitor Information Center	

¹ New single family and secondary dwellings are not allowed along North Lake Boulevard.

² Not allowed on the ground floor along North Lake Boulevard frontage.

Source: King Beach Community Plan, TRPA 1996; Placer County Tahoe Basin Area Plan, Implementing Regulations. Placer County 2015.

3.1.5 Master Response 5 – Tahoe Marina Lakefront Shared-Use Path Alignment

Multiple comments expressed concern regarding a planned trail segment or “missing link” to the Lakeside Trail located in Tahoe City, connecting Commons Beach to the Tahoe City Wye. This trail segment was part of the Tahoe City Mobility Plan, a plan that addressed pedestrian and bicycle mobility and corridor gaps in Tahoe City. The Mobility Plan explored various trail alignments to connect the Lakeside trail where there is a missing link in this location, and after seeking public input on such alignments, the Mobility Plan outlined a conceptual alignment along the lakeside which was broadly supported. Accordingly, the June 2016 Public Review Draft Tahoe Basin Area Plan identified this alignment and location as the preferred alternative for a future trail connection. Comments expressed concern regarding the language used to describe the “preferred alternative” of the trail segment, as well as the trail segment’s depiction on Figures 5-3, 5-5, and 6-3 of the Area Plan, as well as the “Tahoe City Town Center Pedestrian and Shared Use Path Improvements” exhibit in Chapter 3 of the Area Plan Implementing Regulations.

As with all planned pedestrian and bicycle trails, the intent of the Area Plan is to conceptually illustrate a future planned trail. The Area Plan is not intended to precisely depict the alignment of the future Lakeside Trail segment connecting Commons Beach to the Tahoe City Wye or circumscribe any future exercise of discretion regarding such alignment, nor is the Draft EIR/EIS intended to analyze this segment at a project level. Future connection of this trail corridor and the choice of alignment would be an independent project and require full, independent environmental review. However, to address comments received related to the Lakeside Trail “missing link,” the Final Area Plan has been revised to modify the Tahoe City Mobility Plan language and Mobility Plan graphic related to the Lakeside Trail found in Part 5 and Part 8 of the Area Plan, so that a specific future alignment for the missing trail segment is not suggested. In addition, Figures 5-3, 5-5, and 6-3 of the Area Plan, as well as the “Tahoe City Town Center Pedestrian and Shared Use Path Improvements” exhibit in Chapter 3 of the Area Plan Implementing Regulations have been modified to include arrows at each end of the missing trail segment, such that a specific alignment is not illustrated. Any future planning effort to implement this trail segment will be subject to project-level review and environmental analysis.

3.1.6 Master Response 6 – Emergency Access and Evacuation

Several comments addressed the issue of emergency evacuation and response, particularly with respect to wildfire hazard. The following summarizes concerns expressed in comments:

- ▲ Project-generated development will result in greater congestion during peak periods which will impede the ability of emergency responders to both access and evacuate areas within the limits of the Area Plan and beyond during emergency situations.
- ▲ The EIR/EIS should identify performance standards to be met to ensure additional people and vehicles from new or redeveloped projects do not impede evacuation plans, or other means to evaluate the impacts of additional vehicles on the roadway capacity during emergency events.
- ▲ The Area Plan does not provide an emergency response plan or emergency evacuation plan that is formulated to address the capacity of Area Plan roadways to evacuate or provide emergency access.
- ▲ The EIR/EIS analysis of wildfire risk should evaluate emergency evacuation. Reducing fuels to minimize fire risk does not change roadway capacity, nor negate the need for evacuations, and access for emergency responders.
- ▲ The effects of Tahoe City Lodge-generated traffic on emergency access and evacuation should be evaluated.

DEVELOPMENT POTENTIAL OF THE AREA PLAN AND TAHOE CITY LODGE

Concerns were expressed that the project would increase the response times of emergency responders. In this instance, the “project” evaluated in the EIR/EIS includes both the Area Plan (a body of policies, implementation strategies, and land use map) and the Tahoe City Lodge, a near-term development project identified as an initial opportunity to incentivize and facilitate redevelopment in the project area.

As described in the Draft EIR/EIS, the proposed Area Plan is an update to Placer County’s land use regulations in the Tahoe Basin. It is intended to implement and achieve the environmental improvement and redevelopment goals of the Lake Tahoe Regional Plan and the TRPA/Tahoe Metropolitan Planning Organization (TMPO) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Adoption of the Area Plan would supersede numerous area-specific general plans, community plans, Plan area statements (PASs), and related planning documents. As a *planning* instrument, the Area Plan would not, in and of itself, result in approval of any new development that could contribute to increased congestion in the Plan area that would impede emergency access or evacuation. Rather, it would guide the development and redevelopment of the Plan area in a manner that implements the Lake Tahoe Regional Plan.

The Tahoe City Lodge is a proposed 118-unit lodge that would include a mix of hotel rooms and 1- and 2-bedroom suites. The lodge site currently includes, and would replace, a partially occupied 2-story commercial complex, comprised of three buildings. The Tahoe City Lodge would reduce average daily trips, but produce both a small increase in VMT and decrease in LOS as compared to the baseline condition, but a decrease in VMT and better (increase) LOS when compared to the “No Project” alternative (Alternative 4)

As described on page 5-10 of the Draft EIR/EIS and shown in Table 5-2, the commodities remaining for new development of future residential, commercial, and tourist uses within the Plan area are very limited. The remaining commodities available to Placer County include 43 residential development rights (an increase of 0.4 percent over existing); 77,175 square feet of commercial floor area (CFA), including remaining, unused rights and banked CFA, an increase of 5.9 percent); and 61 tourist accommodation units (TAUs), including remaining rights and banked TAUs (an increase of 2.3 percent). This amount of additional growth over the 46,162-acre Plan area (approximately 400 acres of which are within town centers/urban areas) is not substantial. Most new development would be in the form of redevelopment, which would replace existing

development—and therefore, its vehicle trip generation—with new uses. It is the intent of both the Area Plan and Regional Plan that the redevelopment would be concentrated in the town centers, with a focus on, among other things, reduced congestion and support of transit, pedestrian, and bike trail projects that reduce automobile dependency and increase walkability and safety (TRPA 2012:1-1).

EMERGENCY EVACUATION ANALYSIS

Comments express concern that increased peak period congestion will interfere with emergency access and evacuation. These are two very different issues; changes in travel time identified in the traffic analysis (Chapter 10) do not directly relate to the issue of emergency access and evacuation. The traffic analysis was conducted assuming busy but non-emergency traffic conditions, and standard traffic controls. Under emergency evacuation conditions, it is likely that key intersections would be staffed by public safety officers manually directing traffic, thereby overriding standard traffic controls. Emergency personnel would restrict traffic entering the evacuation area to maximize roadway capacity for evacuating traffic. Inbound lanes, or portions thereof, could be redirected to provide additional outbound capacity. Emergency evacuation conditions would likely result in traffic demand that exceeds roadway capacities under any scenario and at any hour, not just at normal peak traffic periods.

The time required to complete an evacuation depends on innumerable factors, including the size and specific area to be evacuated, season, day of the week, time of day, the advance time available, and specific routes available. Moreover, given the extensive geography of the area (roughly 15 miles from end to end) it is unlikely that a condition requiring full evacuation of the entire area would occur. Given these uncertainties, conducting detailed analyses of travel time based on a specific scenario would largely be an exercise in supposition.

A more useful measure of the impact of the various alternatives on evacuation conditions can be provided by an evaluation of the relative number of vehicles that would require evacuation (assuming full evacuation of the Plan area. This evaluation is shown in Table 3-4, and is based on the number of evacuation vehicles generated by the following sources:

- ▲ Evacuation vehicles associated with **permanent residents** can be estimated based upon the number of permanent housing units (per Table 6-8 of the Draft EIR/EIS). It is assumed that some households (20 percent for purposes of this calculation) choose to take two cars in the evacuation.
- ▲ The number of **seasonal resident** vehicles are estimated by considering the number of non-permanent dwelling units (per Table 6-8, assuming that all units not permanently occupied are seasonally occupied). However, even at peak times many seasonally-used dwelling units are not occupied on any one day. The TRPA TransCAD socioeconomic dataset includes an estimate for the Placer Area of 47 percent of seasonal units occupied. To be conservative and reflect a peak condition, it is assumed that 66 percent of these units are occupied. The same number of evacuation vehicles per occupied unit (1.2) is also applied.
- ▲ **Overnight visitor** evacuation vehicles are estimated by totaling the number of lodging units (per Table 6-8) and the number of campground sites (per the TRPA TransCAD socioeconomic dataset). In addition, consistent with the other portions of the Draft EIR/EIS the Brockway Campground (550 sites) is assumed for all future alternatives. One evacuating vehicle is assumed for all units and sites.
- ▲ **Day visitor** vehicles for existing conditions were estimated based upon parking counts presented in the *North Tahoe Parking Study* (LSC, 2015), the proportion of visitors that are not lodged in the area (per the *North Lake Tahoe Resort Association Visitor Research Summary* [RC Associates 2014]), the *Connecting Tahoe Rim Trail Users to Transportation Alternatives Study* (LSC 2015) and counts of parking spaces and shoulder parking at activity centers. While the various future alternatives do not include land use elements that would substantially change recreational day visitor levels, the additional commercial growth would provide increased capacity to accommodate day visitors. The additional day visitor vehicles

associated with this growth was estimated by applying a weighted average parking demand rate, and factoring for the proportion of future peak parking demand generated by day visitors.

- Finally, additional evacuation vehicles will be generated by **employees commuting to the study area**. The total growth in area employment (per Table 6-8) was factored by an estimate of the proportion of employees commuting from outside the Plan area (per the employee survey data presented in the *Truckee North Tahoe Regional Workforce Housing Needs Assessment* (BAE 2016), and factored by the proportion of total payroll employees that would be onsite at a peak time during a summer weekday (when employment is highest).

Table 3-4 Comparison of Total Evacuation Traffic Volumes

Input Data	2014 Existing Conditions	2035 Projected Conditions			
		Alternative 1	Alternative 2	Alternative 3	Alternative 4
Total Housing Units	11,190	12,206	12,206	12,206	12,206
Permanent Housing Units	3,698	4,192	4,192	4,191	4,168
Seasonal Housing Units	7,492	8,014	8,014	8,015	8,038
Tourist Accommodation Units	1,340	1,911	1,511	1,711	1,511
Campground Sites	236	786	786	786	786
Jobs (Payroll Employees)	3,553	4,358	5,062	4,524	5,062
Commercial Floor Area	1,306,564	1,396,882	1,576,882	1,486,882	1,576,882
Additional Commercial Floor Area (KSF)		90.3	270.3	180.3	270.3
Existing Day Visitor Peak Parked Vehicles	730				
Evacuation Vehicles per Residence	1.2				
Evacuation Vehicles per Lodging Unit/Campground Site	1.0				
Assumed Proportion of Seasonal Housing Units Occupied at Peak Time	66%				
% of Visitors that are Day Visitors	22%				
Estimated Weighted Average Commercial Parking Rate	5.9	Spaces per KSF			
% New Commercial Parking Demand Generated by Visitors	80%				
% of Payroll Employees Onsite at Peak Time	60%				
% of Payroll Employees Not Living in Plan Area	50%				
Employees per Evacuation Vehicle	1.2				
Total Estimated Vehicles for Evacuation					
Permanent Residents	4,438	5,030	5,030	5,029	5,002
Seasonal Residents	5,934	6,347	6,347	6,348	6,366
Overnight Visitors	1,576	2,697	2,297	2,497	2,297
Day Visitors	728	822	1,008	915	1,008
Onsite Employees Not Living In Plan Area	888	1,090	1,266	1,131	1,266
Total Vehicles for Evacuation	13,563	15,985	15,948	15,920	15,939
Change Over Existing		2,422	2,385	2,357	2,375
% Change Over Existing		17.9%	17.6%	17.4%	17.5%
Excluding Brockway Campground					
Total Vehicles	13,563	15,435	15,398	15,370	15,389
Increase Over Existing		1,872	1,835	1,807	1,825
% Increase Over Existing		13.8%	13.5%	13.3%	13.5%

Source: Information provided by LSC Transportation Consultants, Inc. in 216

As shown in the Table 3-4, the total number of vehicles to be evacuated under baseline conditions is estimated to be 13,563. This increases under the future alternatives to 15,920 (Alternative 3) to 15,985 (Alternative 1) vehicles. This is equivalent to a 17.5 percent to 17.9 percent increase in vehicle. All of the future alternatives result in a very similar number, including the no project alternative, with only a 0.4 percent difference between the lowest and highest value. If the Brockway Campground is not constructed, the evacuation traffic volume is reduced to between 13.3 percent and 13.8 percent, depending on the alternative.

These figures can be used to gain a rough understanding of the impacts of the various alternatives on evacuation travel time. One reasonable scenario (assuming full evacuation) would be that two egress points are available (such as SR 89 and SR 267 to the north) with the southbound travel lanes not available for evacuation (to provide ingress for emergency vehicles). A typical travel lane of a two-lane highway can accommodate on the order of 1,800 vehicles per hour. Dividing the total vehicles (including Brockway Campground) by 1,800 per egress point over two egress points (and assuming that manual traffic controls within the Plan area provide the necessary capacity to the egress points, and there are no accidents or other factors limiting capacity), under current conditions the area could be evacuated in 3.77 hours. For the future alternatives (including no project), this figure increases to a low of 4.42 hours (Alternative 3) and a high of 4.44 hours (Alternative 1). This difference in the future alternatives value is equal to 1.1 minutes of additional evacuation time. In other words, the remaining development potential in the Plan area, with or without the proposed Area Plan and Tahoe City Lodge, will result in some increase in vehicle traffic which will extend the time required to evacuate the area. Because the remaining development potential is modest, and there is no evidence to suggest that the project would adversely affect ease or timing of emergency evacuation, and that there is no discernable difference between future project conditions and no project conditions, the impact would be less than significant.

Comments were received that suggest that the EIR/EIS should define performance standards to ensure additional people and vehicles from new or redeveloped projects do not impede evacuation, or other means to evaluate the impacts of additional vehicles on the roadway capacity during emergency events. Performance standards are required when mitigation measures are recommended for significant impacts and the details of that mitigation are necessarily deferred. Because no significant effects have been identified, performance standards are not required.

PLACER COUNTY EMERGENCY RESPONSE PLANS

Placer County has in place several existing emergency response plans, including the Placer Operational Area East Side Emergency Evacuation Plan, Placer County Local Hazard Mitigation Plan, and Lake Tahoe Geographic Response Plan [LTGRP]. Each of these plans is summarized on pages 18-6 through 18-10 of the Draft EIR/EIS and each fulfills its stated purpose. The Placer Operational Area East Side Emergency Evacuation Plan was developed to help increase preparedness and facilitate the efficient and rapid evacuation of threatened communities in the far eastern end of the county in the event of an emergency, such as a forest fire or flood. The Placer County Local Hazard Mitigation Plan was developed to reduce or eliminate long-term risk to people and property from natural hazards and their effects, and includes implementing actions and programs that would help reduce wildfire hazards including, but not limited to, Firewise Communities/USA Education Outreach, Hazardous Vegetation Abatement Program, Biomass Removal Projects, and Annual Defensible Space Inspections Program in the Unincorporated County. The LTGRP is the principal guide for agencies within the Lake Tahoe watershed, its incorporated cities, and other local government entities in mitigating hazardous materials emergencies.

With regard to the Placer Operational Area East Side Emergency Evacuation Plan, specifically, and its applicability to the Plan area, page 1 of the plan states, “[f]or the purposes of this plan, the ‘eastern side’ comprises all of Placer County from just west of Cisco Grove to the Nevada State line not including the areas within the Tahoe National Forest and the Lake Tahoe Basin Management Unit [LTBMU].” The LTBMU consists of only National Forest System land only. The East Side Emergency Evacuation Plan prescribes specific responsibilities for first responders and other agencies that would be involved in an emergency

evacuation, defines typical evacuation scenarios, establishes incident command responsibilities, and addresses traffic control, transportation, resources and support, communications, care and shelter, and animal services. It identifies nine evacuation center and the major evacuation routes to include Interstate 80, and SRs 267, 89, and 28. Exhibit 3-2 shows evacuation routes for the Placer County portion of the Tahoe Basin (North Tahoe Fire Protection District 2016). It also appropriately recognizes challenges in the Tahoe Basin, that “the dense forests, rugged terrain, and the scarcity of roads in the area - problems that present difficulties for first responders and residents/transients alike - complicate any evacuation.” (Placer County Office of Emergency Services 2015:1)

On comment suggests that the Area Plan does not comply with the requirements of Government Code Section 65302(g). As outlined in Part 1 of the Area Plan, the Placer County General Plan governs all topics not addressed in the Area Plan or TRPA plans. Consistent with Government Code Section 65302(g), the 2013 Placer County General Plan includes a Health and Safety Element, which includes goals and policies related to seismic and geologic hazards, flood hazards, fire hazards, airport hazards, emergency management, public safety and emergency management facilities, hazardous materials, and avalanche hazards. The 2015 Placer Operational Eastside Emergency Evacuation Plan is intended to implement the General Plan’s Health and Safety Element and further comply with the requirements of Government Code Section 65302(g). In response to this comment, two additional policies have been added to the revised version of the Area Plan released concurrently with this Final EIR/EIS (Policies N-H-P-6 and N-H-P-7), which incorporate by reference the 2015 Placer Operational Eastside Emergency Evacuation Plan and outline a requirement for all new development projects within the Plan area to prepare and implement an emergency preparedness and evacuation plan consistent with Government Code Section 65303(g). The additional polices include the following:

- ▲ **Policy N-H-P-6.** All new development projects within the Plan area shall prepare and implement an emergency preparedness and evacuation plan consistent with Government Code Section 65302(g) (protection from unreasonable risks associated with the effects of seismic, geologic or flooding events or wildland fires, etc.) and in the furtherance of the Placer Operation Area East Side Emergency Evacuation Plan (Update 2015).
- ▲ **Policy N-H-P-7:** The Placer Operational Area East Side Emergency Evacuation Plan, as updated by the Board of Supervisors in 2015 is hereby incorporated by reference.

WILDFIRE HAZARDS AND EMERGENCY EVACUATION

Wildland fire hazards are described on page 18-12, and shown in Exhibit 18-1 of the Draft EIR/EIS. These discussions explain, and the exhibits show, that the Plan Area contains moderate, high, and very high fire hazard severity zones, and the Tahoe City Lodge is located in a very high fire hazard severity zone. The significance criterion related to wildfires is described on page 18-14 of the Draft EIR/EIS: expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Based on the project setting in a moderate to a very high fire hazard area and the significance criterion, the Draft EIR/EIS concludes that the impact related to exposure of people or structures to a significant risk of loss, injury, or death involving wildfire for the Area Plan and Tahoe City Lodge would be less than significant (see Impact 18-4 on pages 18-27 through 18-30 of the Draft EIR/EIS), because future development in the Placer County portion of the Tahoe Basin, including the Tahoe City Lodge, would be required to comply with Regional Plan policies, existing local and state regulations for fire protection (including North Tahoe Fire Protection District review and approval to ensure all fire protection measures are incorporated into the project design), and proposed Area Plan policies for fire fuel reduction and increases in defensible space. While such policies do not directly affect the issue of emergency evacuation, they serve to reduce the severity and extent of wildfires, improve the ability to control and fight wildfires, improve the ability to shelter in place in appropriate structures, and ultimately reduce the potential for loss of life and property. Impact 14-4 on page 19-32 assesses cumulative wildland fire hazards, which describes fire hazards from a regional perspective.



Exhibit 3-2

Evacuation Routes



AREA PLAN AND TAHOE CITY LODGE EFFECTS ON EMERGENCY EVACUATION AND RESPONSE

Several comments suggest that the project will result in substantially greater traffic generation and congestion that will impede the ability of emergency responders to both access and evacuate areas within the limits of the Plan area and beyond during emergency situations. While concern about wildfire and emergency evacuation from the Plan area is an acknowledged and legitimate concern, the notion that the project—defined as the Tahoe Basin Area Plan and Tahoe City Lodge—would exacerbate existing conditions with respect to emergency evacuation is not supported by facts.

First, as described above, changes in travel time (i.e., reduced LOS) identified in the traffic analysis (Chapter 10) do not directly relate to the issue of emergency access and evacuation. In an emergency situation requiring evacuation, roadways and intersections would likely be controlled by emergency personnel, which would implement measures designed to maximize roadway capacity in the outbound direction, including converting lane directions.

Second, new development potential is very limited. Remaining commodities include 43 residential development rights, 77,175 square feet of CFA (approximately equal to a single supermarket, or several small businesses), and 61 tourist accommodation units. This amount of development in the entire 400+-acre urbanized portion of the Plan area, particularly in the context of the smart-growth policies of the Regional Plan and Area Plan, would result in traffic impacts that, depending upon their ultimate locations, would likely be immeasurable.

Third, this level of additional development could occur *with or without* the Area Plan. As noted above, the Area Plan consist of a body of policies, implementation plans, and a land use map to guide future development and redevelopment; no provision of the plan proposes or approves development. The Tahoe City Lodge project must comply with existing requirements of the Regional Plan to secure the development rights necessary to implement the project—it does not increase the regional cap on any development rights. In addition, as a redevelopment project, it will supplant existing uses on the site and generate fewer total daily vehicle trips than those uses.

Fourth, as described in Chapter 10 of the Draft EIR/EIS, implementation of any of the alternatives would result in very modest increases in average daily trips (ADT) during summertime peak-hour periods in the year 2035—on the order of 4.5 percent for the study area as a whole, and 2.8 percent on SR 28. Importantly, ADT generated by the no project alternative would be essentially the same (see Table 10-5 of the Draft EIR/EIS). For the most congested roadway segment (SR 28, Between Wye and Grove Street), each of the action alternatives would reduce the number of vehicles heading eastbound relative to existing conditions and the no project Alternative, and westbound relative to the no project alternative. With regard to total vehicle miles traveled (VMT), implementation of Alternatives 1 and 3 would reduce total VMT in 2035 (that is, under cumulative conditions) relative to existing conditions and VMT resulting from Alternative 2 would be essentially the same. VMT under the no project alternative would be slightly worse. (See Draft EIR/EIS Table 10-12). In other words, analysis shows that, as compared to existing conditions and especially to the no project alternative in 2035, implementation of the Area Plan and Tahoe City Lodge would have relatively minor traffic impacts. Traffic conditions in 2035 will be influenced more by the type and location of subsequent development, which cannot be accurately predicted, than by the Area Plan itself.

Fifth, as described in the Draft EIR/EIS, new buildings and structures are required to be constructed consistent with the latest fire code requirements (updated every 3 years) and defensible space requirements. New projects in Placer County, such as the Tahoe City Lodge, are required to obtain fire district approval prior to permit issuance by Placer County and TRPA and, pursuant to policies added to the Area Plan, would be required to prepare emergency preparedness and evacuation plans.

Finally, the Draft EIR/EIS discusses interference with an emergency response plan or emergency evacuation plan (see Chapter 18, Impact 18-3). As discussed therein, the project would not cut off or otherwise modify any existing evacuation routes. Placer County maintains Placer Alert, a state of the art community notification system to alert residents about emergency events and other important public safety information,

and the Placer Operational Area East Side Emergency Evacuation Plan, described above. The plan addresses all elements of emergency response and evacuation of the Placer County portion of the Tahoe Basin and is incorporated into the Placer County Tahoe Basin Area Plan.

CONCLUSION

Issues of wildfire, emergency access, and evacuation are important concerns, as they would be for any mountain community susceptible to wildfire. The Draft EIR/EIS includes a thorough evaluation of the issue, and based on that analysis, it is determined that implementation of the proposed project would have a less-than-significant effect on emergency access and evacuation in the Plan area. Few development rights remain for the Plan area, so the potential for additional growth and associated traffic congestion is not only limited, but could be implemented with or without the Area Plan. The traffic analysis demonstrates very little change in traffic conditions with any of the action alternatives in 2035, and the no project alternative is generally similar or worse. The Tahoe City Lodge would reduce average daily trips, but produce both a small increase in VMT and decrease in LOS as compared to the baseline condition, but a decrease in VMT and better (increase) LOS when compared to the “No Project” alternative (Alternative 4). Placer County maintains a comprehensive emergency evacuation plan and a notification system to alert the community in the event of an emergency or need for evacuation. While the location, intensity, speed, and direction of a given wildfire cannot be predicted, systems are in place for wildfire tracking and response by applicable agencies, and there is no evidence to suggest that implementation of the proposed project would have a substantial effect on emergency access or evacuation.