Letter 81

Raine Rude
11 Schooner Hill
Oakland, CA 94618

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BOARD OF SUPERVISORS
5BOS ✓ TL ✓ ALL AIDES ✓ CL ✓ (mail person)
AUG - 1 2016
SUP____ COB Corr____ CoCo____
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July 18, 2016

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Placer County June 2016 Public Review Draft Tahoe Basin Area Plan and
Draft Environmental Impact Report/Environmental Impact Statement

For many years our family owned a cabin across the road from Sunnyside Resort, which required us to cross the road to get to our beach, pier, and boat buoy.

For reasons of convenience and especially for the safety of our children, my husband and I in 1988 chose to buy our condo at Tahoe Marina Lakefront. Now we have children and grandchildren and guests who enjoy the safety and security of TML. My appeal is for the County to return to the September 2015 Area Bike Path Plan to connect Commons Beach with Fanny Bridge. This shared-use path is behind TML and is set back from the road. TML has repeatedly offered to work with the County to put this plan into effect.

Safety and security are main concerns along with value of our TML property. A path along the water line would cause us homeowners to erect a fence, which would greatly decrease enjoyment of our lakeside property and would come very close to several condos. Our very young children now enjoy romping on our grassy area and beach into the lake. I cannot envision what a water line path would do to this grandmother's peace of mind. I also cannot imagine the environmental impact a lakeside path would have on the Lake.

Please consider my appeal to scrap the June 2016 draft plan and revert to the September 2015 plan. 81-1

Sincerely,

Raine Rude
Tahoe Marina Lakefront #31
270 North Lake Boulevard
Tahoe City, CA 96145

Cc: Each Member, Placer County Board of Supervisors, 175 Fulweiler Avenue, Auburn, CA 95603
Honorable Jack Duran, Supervisor, District 1
Honorable Robert Weygandt, Supervisor, District 2
Honorable Jim Homes, Supervisor, District 3
Honorable Kirk Uhler, Supervisor, District 4
Honorable Jennifer Montgomery, Supervisor, District 5

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Theresa S. Rude
3234 Encinal Avenue
Alameda, CA 94501

July 17, 2016

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Placer County June 2016 Public Review Draft Tahoe Basin Area Plan and Draft Environmental Impact Report/Environmental Impact Statement

Based on an extensive review of the Placer County June 2016 Public Review Draft Tahoe Basin Area Plan (Plan) and the Draft Environmental Impact Report/Environmental Impact Statement (DEIR), it appears you have two separate but related decision paths to take. One is the review and certification of the DEIR and the other is the consideration of the Plan and subsequent direction to staff regarding the additional analysis needed prior to any adoption of the Plan.

The purpose of this letter is to address the serious concerns we, as homeowners, have regarding a portion of the Plan presenting a possible shared-use path/trail extension route along the lakeside between Fanny Bridge and Commons Beach crossing the entire length of the lakefront property known as the Tahoe Marina Lakefront (TML).

The County of Placer website sets out the two documents (Plan & DEIR) with the following information:

"*PROJECT DESCRIPTION: The proposed Area Plan is a Placer County-initiated update to its land use regulations that apply in the Tahoe Basin. It would update the existing community plans, general plans, plan area statements, maps, and regulations in the Placer County portion of the Tahoe Basin and is being developed to implement the TRPA Regional Plan. Proposed amendments to existing plans, maps, and regulations are primarily focused within the TRPA-designated town centers in Tahoe City and Kings Beach. The proposed Area Plan contemplates one near-term redevelopment project, the Tahoe City Lodge, and one environmental redevelopment design concept, the Kings Beach Center, both identified as opportunities to incentivize and facilitate redevelopment in these areas. The Kings Beach Center design concept is a conceptual mixed-use redevelopment design on parcels owned by Placer County.*" 81-2

We contend that the DEIR gives you sufficient information to make decisions regarding ONLY the site specific Tahoe City Lodge project and the Kings Beach Center and NOT the site specific shared-use path project route proposals mentioned in the Plan. This proposal requires its own detailed EIR process.

The stated purpose of the DEIR is:

"to identify and assess the anticipated environmental effects of each alternative, *with a focus on significant and potentially significant environmental impacts*. Its role is not to recommend approval or denial of the project, but to provide sufficient environmental information to allow meaningful comment and participation by public agencies, interest groups, and the public; to allow the Placer County Planning Commission, TRPA Advisory Planning Commission, and/or TRPA Regional Plan Implementation Committee to recommend a preferred alternative to the

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Placer County Board of Supervisors and TRPA Governing Board, respectively; and ultimately for the decision-making bodies *to render fully informed decisions with regard to the proposed Area Plan and Tahoe City Lodge project*."

The DEIR's focus is the two major development projects one in Tahoe City and one in Kings Beach. There is NO analysis of the "lakeside route alternative" for the Fanny Bridge - Commons Beach shared-use path connection which is detailed at project level specificity in Part 5 of the Plan. Since the ability "to render a fully informed decision" is the purpose and goal of the process, it *will not be* possible for either the Tahoe City PUD or the Board of Supervisors to make a final decision on anything other than the two development projects which are the focus of the extensive DEIR analysis. The lakeside shared-use path route will require the same extensive environmental impact review prior to ANY decision.

Repeatedly throughout both documents the most important stated goal is to protect and improve the clarity of the Lake. The proposed "lakeside shared-use trail/path alternative" connecting the Fanny Bridge trail with the Commons Beach trail does NOT promote that Lake clarity goal nor does it meet many of the other stated goals. None of the documents addressed the impacts of the "lakeside alternative" nor did they address how or why it is now listed as the "preferred" alternative - a change from all earlier documents. You as the governing body cannot make that determination unless you have studied the impacts, costs and objectives of each alternative. To our knowledge that process has yet to occur as it pertains to the shared-use path/trail.

As longtime owners at TML we present the impacts we believe make this lakeside route the *least* desirable alternative.

81-2 cont

- TML is in a Stream Environmental Zone (SEZ) and an increase in impervious surfaces in a SEZ is undesirable, a lakeside shared use path is an impervious surface running right next to the lake side altering the runoff patterns and ground water recharge cycles as well as adding pollutants and trash to the water.
- If the desire is to work on restoring sensitive landscapes then further altering the existing shoreline through the TML property with hard-scape "improvements" is decidedly not restorative.
- The existing shared use paths are at least 10 feet wide, so even if other obstacles were overcome, there is insufficient actual real estate along the TML shoreline to accommodate such a path.
- Construction of the path would negatively impact the lake clarity, the TML beach itself and the southern portion of Commons Beach because it would require the removal of the beaches themselves in order to be replaced by paved pathways with protective rip-rap (An elevated alternate would act as a very low pier and severely impede water access for humans and animals not to mention requiring more space and in-lake construction). In addition several trees and scrubs would need to be removed again not restoring sensitive land or habitats.
- TML now owns the existing pier so a path would separate the main property from the pier as well as the lake, increasing the security measures necessary to both protect property and insure the safety of residents and path users.
- Having a path/trail imposed along our shoreline is a "taking of private property", requiring impact findings, significant compensation to the property owners and undoubtedly a lengthy and expensive legal process. A very real waste of resources which would be better directed at less impactful and thereby quicker to implement alternatives.

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- Finally and significantly, the shared-use path concept has been presented with several alternatives in prior documents, but suddenly, with no supporting feasibility or impact review, the lakeside alternative is listed as the "preferred alternative". How and by whom was that "preference" made? It is absolutely NOT reviewed in the DEIR. The property right impact alone rightfully triggers an impact evaluation.

The shared use path connection is a wonderful goal and our objection to the lakeside option is not NIMBYizm as TML represents a legal pre-existing property use and there are other viable alternatives in the *immediate vicinity* of the property which we fully support . TML owners do expect and are entitled to, the same full, "quiet enjoyment" as *ALL* other lakefront property owners. These concerns raise significant questions regarding the thoroughness of the review process. Therefore, we as owners assert that without a full and complete EIR directed to all of the proposed shared-use path route alternatives, no *fully informed decisions* can be made by any governing body or official. 81-2 cont

In conclusion, the Area Plan must be changed to reflect the need for future analysis of all alternatives. In addition, the Tahoe City Mobility Plan which is incorporated by reference into the Plan must be changed to also reflect the need for full analysis of all alternatives, not just the water side alternatives, as it currently states.

We thank you for your prompt and thorough consideration of our concerns, rights and requests.

Sincerely,

Theresa S. Rude

Theresa S. Rude

Tahoe Marina Lakefront #31
270 North Lake Boulevard
Tahoe City, CA 96145

Cc: Each Member, Placer County Board of Supervisors

Honorable Jack Duran, Supervisor, District 1
Honorable Robert Weygandt, Supervisor, District 2
Honorable Jim Homes, Supervisor, District 3
Honorable Kirk Uhler, Supervisor, District 4
Honorable Jennifer Montgomery, Supervisor, District 5

| Letter 81 | Raine Rude<br>July 18, 2016 |
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81-1 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and concern regarding the potential adverse impacts associated with this shared-use path alignment. In addition, the comment suggests an alternative location for the shared-use path alignment. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

81-2 This comment also expresses concern regarding the lake side shared-use path. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

**Letter 82**

**Comments for The Record from Aaron Rudnick Bechdolt Building OWNER:**

**DRAFT Environmental Impact Report/Environmental Impact Statement (EIR/EIS) Placer County Tahoe Basin Area Plan (TBAP) Clearinghouse # 2014072039 August 15, 2016**

There are glaring inconsistencies across the entirety of the TBAP DEIR/EIS. The neighboring properties should absolutely be included in all maps and visuals in the TBAP Final EIR/EIS (FEIR)..

Many of the maps do not show the property boundary, and rather show a bold line showing the edge of the PROJECT, which conveniently leaves out the fact that so much of the project area is over the property line of the actual land owned by Kila Tahoe LLC.
The TBAP FEIR/EIS must provide corrected maps that include actual property boundary line versus proposed inaccurate project boundary line.

It is imperative to the public's understanding of the project that the smoke and mirrors be cast aside and all visuals show the actual property lines of each parcel, not just the project boundaries. Almost every member of the public that was shown the actual property lines had no idea, and just assumed no one would be brash enough to build such a project on land that wasn't theirs. Such a thing has already happened when Ollie Henrickson built his structures. Historical documents (included) show Ollie's errors. As the only ones actually owning, paying taxes on, and maintaining a portion of the land the TC Lodge project plans on using as their own, it will be devastating to see the County, TCPUD, TRPA and many more not only allow, but encourage such a blatant land grab, stealing property from a local citizen and allowing it to go to an outsider without the proper experience for such a grand project as the one proposed in the draft TBAP EIR/EIS. Include deed information

Kila Properties has yet to disclose any of their financials to show that Samir Tuma/ Kila Tahoe is even capable of paying for such a project outright. If he doesn't get his timeshares sold on the condos, will we be stuck with a half completed project? Mr. Tuma's refusal to build alternative 2, (a smaller, and more appropriate option for the amount of land proposed) makes that even more worrisome. 82-1

This project is OVER THREE ACRES. The TBAP DEIR/EIS must stop saying ( and be corrected in the FEIR/EIS) that he is going above and beyond in his SEZ restoration, when it is actually subpar. One of the more problematic inconsistencies is that the project conveniently goes back and forth from the 1.4 acres actually owned by Kila Tahoe, and the 3+ 82-2

acres that the total project area will encompass.
The TBAP FEIR/EIS must include language stating that 3+acres of SEZ will be restored to accurat ely apply to TRPA code 1:1 requirement. If it is assumed that he need only do restoration for part of the total area of his project, I would then have to ask why that is.

A TRUE one to one SEZ restoration is near impossible given what it would require, and the equipment, fuel, etc required to accomplish the undertaking. If the project area is 3+ acres, then that should be what the requirements for all other aspects are weighed against. It is tragically inappropriate to give so many invaluable public commodities to one entity, but then also cut them a break on environmental restoration. Building in Tahoe is a privilege, and absolutely should be treated as such. 82-2 cont

A ten foot setback for the entire building is not adequate. The project should be held to the standard twenty feet, and no variance should be allowed. As referenced in section 9-17; "Taller buildings with reduced setbacks will have a greater potential to block views of mountains, ridgelines, Lake Tahoe, and other scenic views."

With that being stated, why on earth would the TRPA or any other agency allow a reduced setback for a FOUR STORY building?
The TBAP FEIR/EIS must provide scenic analysis and evidence that reduced setbacks create less scenic degradation. 82-3

Why are our public agencies allowing such a transfer of CFA to TAUs? Is this creating growth that was not analyzed in the TRPA Regional Plan Update! The TB AP DEIR/EIS did not analyze new growth. The TAU's must come from some other mechanism n ot CFA to TAU conversion. 82-4

This entire project is trying to put a cherry on top of a sundae that is yet to be built. Kila Tahoe plans on displacing roughly a dozen local businesses, almost all of whom have no alternate location to move to.

Town Center redevelopment is supposed to create a place to live, work and play not destroy sm all businesses' livelihood. No mention of relocation assistance is in the TBAP DEIR/EIS. Placer Co unty should assist the displaced businesses and not just the developer. People will not desire to stay in Tahoe City if there is nowhere for them to eat, or even less to see and do. This is especially true of the particular clientele this lodge hopes to attract. 82-5

The developer Samir Tuma stated in front of the Placer County Planning Commission, as well as the TRPA Governing Board, that he would NOT build "alternative 2" if that was the chosen option. That automatically makes that NOT A VIABLE ALTERNATIVE and Kila 82-6

should present an actual alternative in the TBAP FEIR/EIS. This whole "If I don't get everything I want, for free, I'll take my ball and go home" mentality is not even close to "caring for the community" it is holding it hostage for an incredible ransom. 82-6 cont

It has been stated in public meetings on the record that there would be ski resort shuttles using the new lodge as a stop. Where are they planning on putting them?
The TBAP FEIR/EIS must include diagrams showing this proposal, queuing and parking (where w ill they be stored when not in use?). As Mr. Tuma is removing his driveway, and planning on solely using mine, the easement will already be overloaded. There is absolutely no room physically or in the easement language for busses and shuttles in an already precarious driveway overburdened by current traffic, and looking at adding well over two hundred more daily cars. The FEIR/EIS must include a traffic count study for all proposed uses of the easement. 82-7

The only recreation listed as provided by the hotel itself, and not piggybacking on public amenities will itself be closed to the public. There will be no access to the pool, (a new private pool in drought stricken Tahoe????) hot tub, exercise room, etc, for the public, once again showing that this project is taking so much more than it is actually giving back.
The TBAP FEIR/EIS must include approximate water use/volume of pool, hot tubs, etc. above a nd beyond hotel and restaurant use. 82-8

The Henrickson building needs to go, but not at the cost of this town's future, and not paid for by the time and sweat of the public. The fact that any alternatives less than the horrendously obtrusive ones planned will not be built is a serious red flag. Basecamp, in Tahoe City, did not need even a fraction of the special consideration one man is being given, yet they still managed to repair a blighted part of Tahoe City, and did so by following the rules.

The statements about increasing the neighboring property values are false if Kila Tahoe is given everything it is trying to take. After taking my parking, on MY property, I would never be able to add another story to my building. With the majority of new commodities being created and the push for Public/Private partnerships, I don't see any situation where there would be options for the same deals in the future. Given the threats made against us by senior staff in the TCPUD and Placer County, it really doesn't sound like there would be any cooperation with/from local agencies in the future. 82-9

I have covered the issue with alternative 2 not being a true alternative, but it bears repeating that NOT ONE of the alternatives shows a hotel that does not 100% use our driveway for their main entrance. If the foot print is the same, how much of an alternative is it really? I just cannot believe that it would be cheaper or easier to deal with litigation and the future struggles imminent with the project, rather than redraw a proper alternative using the driveway currently owned by Kila Tahoe, and not one owned by Sierra Northwest Properties.

We spent a morning recording the traffic going in and out of the golf course, and found that with the current easements, many people still cut through our property other ways to get to the course, rather than use the designated entrance. This was especially true of large semi trucks delivering goods to the clubhouse. If the current driveway is so overburdened, without the true 100% of traffic that should be on it, how much more will the issue be exacerbated once the traffic increases tenfold?
The FEIR/EIS must include a traffic count study for all proposed uses of the easement.

Numerous requests have been made to get proper traffic studies for the easements and a maintenance agreement with the PUD and Kila Tahoe. Kila Tahoe has offered zero input or assistance into the matter. The TCPUD has also been mostly absent, though they did respond once by email addressing that it could happen, but they have made no effort to follow through. This is evidenced in the public comment portion of the August 8th 2016 Golf Course Oversight Committee meeting, where I was forced to address the committee looking for answers on why I received not one email or call for months between the May meeting, where I once again asked for it to be on the docket and progress to be made. It is incredibly disappointing that we can't seem to make even the slightest progress towards any work being done on the current issues with "shared property."

Section 10.4.3 Paragraph 2 *"Tahoe City Lodge Alternatives 1 and 3 would not add traffic volumes in a direction or location that would exacerbate an existing LOS deficiency or degrade an existing acceptable LOS. Tahoe City Lodge Alternatives 1 and 3 would still be subject to payment of traffic mitigation fees prior to issuance of any building permits, and this would reduce the project's impact on roadway LOS to less-than-significant. Tahoe City Lodge Alternative 2 would create a reduction in traffic volumes, resulting in a beneficial impact to roadway LOS. "* There is already an incredible amount of traffic through our driveway and across our property, as mentioned previously in these comments. The easement is overloaded currently and was never created for the load proposed on it. It is impossible to believe there would be no impact on level of
service. The TBAP FEIR/EIS must provide evidence through analysis that LOS is not degraded. Al l aspects and documents related to the traffic studies should be shown in their entirety in the T BAP FEIR/EIS. Individual traffic studies should be done on each individual proposed or current use of any of the properties affected by the current proposals. Meetings at the clubhouse at maximum occupancy, restaurant peaks, 50% occupancy, ice rink standard and ice rink peak, current approximate uses such as all the overflow and poached parking due to the Farmer's Market, movies/concerts on the beach, etc. 82-10

The parking maps show that Kila Tahoe's property will not be used for parking, and will rely on the property of others. This new push for "shared use" parking has one serious issue. The 82-11

parking on our property was NEVER ASKED FOR. "Sharing" implies that there was some mutual agreement made. A mutual agreement with all signatories (property owners that will be Impacted; Bechdolt, Savemart, ZA's etc. all bordering the proposed Lodge property that will possibly use the easement/parking) must be a permit condition and stated in the FEIR as required. We have never once been asked to use or share or property for this project, and I would hope by now after countless meetings and years of voicing opposition to a land grab taking our property for someone else's gain, that it is abundantly clear how vehemently opposed we are to this portion of the project.

Look at the actual maps for parking in the DEIR. The vast distance from the far spaces to the actual hotel room doors is incredible. Will people be walking all that way with their luggage? Will that also be the case in the winter, when the snow and ice return? How long will it be before people do not wish to do that? Will we then see a golf cart, or some other shuttle vehicle operating to ferry them from their cars to their rooms. Many other hotels use them, yet there is no mention of any potential for anything like that, and without such, they must not be allowed in the future. The FEIR must restrict as a permit condition the Lodge from new uses (golf carts for customer service from outlying parking spaces) without additional analysis especially because the easement is already exacerbated by too many uses. 82-11 cont

In the DEIR/EIS, as well as an the many presentations from Ascent Environmental, there is only one Lodge Alternative that will bring a reduction in VMT and a decrease in pollutant loads with respect to hydrology and water quality. As mentioned previously in the comments, the developer refuses to build alternative #2. This leaves us with no alternatives offering reductions in two very important issues inherent to this basin, vehicles on the roadways, and water quality.

There did not seem to be any mention, or study on shade coverage in the DEIR. With such a large building, it will cast a tremendous shadow on our property, leading to not only scenic issues, a significant loss of natural light in the day time, but a dramatic increase in dangerous ground during the winter. Ice and snow will remain prevalent much longer in the shade, please include in the FEIR, proper information and accurate projections towards what factors shade will play on the neighboring parcels. A shadow analysis and related health and safety impacts to all surrounding properties that are affected due to new building heights and shadowing must be analyzed in the FEIR. 82-12

Where is the designation for ADA parking? Given the sheer number of spaces, more than one space will be required. How will they at all be close to the entrance, if Kila Tahoe will be stealing and removing our parking on that side? (A maneuver they do not have the right to do, reminding everyone that the easement is not for his parking at all, and does not provide any 82-13

language to make that a reasonable assumption.) There are no spaces shown on the current maps displayed at the 8/11/2016 NTRAC and countless other meetings. The FEIR must include handicap parking requirements for the lodge, golf course, all properties 82-13 cont

As it is currently planned today, evidenced from so many comments made in numerous public meetings, and this, the draft EIR itself, the Tahoe City Lodge Project is far too dense, and poorly planned to be implemented in its current form. A driveway on its own property is a crucial start. The FEIR must include an alternative for the Lodge project that has the entrance within the confines of the 1.4 acres and not using the easement. This is a reasonable request and should at the very least be analyzed to state why it's not feasible. This same alternative would essentially reduce the number of condo units to provide the necessary entry. Stating a reduced density alternative is infeasible does not provide an adequate range per CEQA. 82-14

Providing adequate room for fire and emergency services also needs to be prioritized and included in the FEIR. The DEIR does not demonstrate adequate fire response info. Provide a diagram in the FEIR that the fire district would accept for emergency evacuation and response at both the lodge and golf course and surrounding project area properties "sharing" the easement. 82-15

Proper logistics on snow removal, including the questions of how, why, how much, how long and more need to be presented more clearly in the FEIR. Provide a diagram along with assessments needed to determine adequate space is available for all current properties storing snow where the project proposes to do so in the FEIR. 82-16

This project is being fueled by emotion, dealing in vague promises, and an opportunity to remove an eyesore from our town. We should not let ourselves and our public agents get so far ahead of reason, the area's governing principles, and our future, just because we've all had that "what if…" moment thinking about a life without the Henrickson property. Please send the developer back to the drawing board to try again. An architect will always be cheaper than the fallout of a poorly planned project. 82-17

## Letter 82

**Aaron Rudnick**
August 9, 2016

82-1 The comment raises concerns that the commenter's property and corresponding property lines are not shown on the project maps, and that the project applicant is proposing to build on the commenter's property. See Section 2.1.1, "Description of Tahoe City Lodge Changes," in Chapter 2 of this Final EIR/EIS. Among the changes made, maps included in Appendix D of the Draft EIR/EIS are revised to enhance the visibility of property boundaries. No buildings are shown or would be constructed on the commenter's property. However, an easement over a portion of the commenter's property is shown, and would be used pursuant to the right granted under that easement. See responses to comments 54-1 and 54A-1 regarding the rights within the easement.

82-2 The comment expresses the opinion that the Tahoe City Lodge SEZ restoration component is insufficient. The comment also requests that the Tahoe City Lodge project be required to restore an SEZ area equal to the size of the project area (approximately 3.9 acres). As described on page 3-29 of the Draft EIR/EIS, the SEZ restoration component of the Tahoe City Lodge project is a function of the project's use of 1.7 acres of land within the proposed Tahoe City Golf Course Special Planning Area (SPA). Projects within the SPA would be required to restore disturbed SEZ at a ratio of 1 square foot of restored SEZ for each square

foot of the SPA included in a project area. Therefore, the conclusion in the Draft EIR/EIS that the project requires restoration of 1.7 acres of SEZ land is consistent with TRPA requirements.

82-3 The comment suggests that the proposed Tahoe City Lodge project should be required to comply with a twenty-foot setback rather than be granted a variance for a ten-foot setback, and that the EIR/EIS must analyze the scenic impacts of the reduced setback. As described on page 9-17 of the Draft EIR/EIS "Currently, new or redeveloped buildings along SR 28 or SR 89 in the Tahoe City or Kings Beach Town Centers are required to include a minimum 20-foot setback. This setback can be reduced if TRPA finds that a reduced setback will not cause a decrease in the applicable scenic threshold standard, as described in TRPA Code Section 36.5.4. Alternative 1 would replace the existing setback requirements with reduced setback distances within several subdistricts to promote pedestrian activity. In some cases, the new setback standards would include maximum setback distances instead of minimum distances to create a consistent active pedestrian space between roadways and buildings." The Draft EIR/EIS goes on to explain that the applicable setback in the Mixed-Use Town Center subdistrict of Tahoe City, where the project site is located, is a ten-foot maximum setback. Thus, the proposed Tahoe City lodge project is not seeking a variance for a ten-foot setback, rather it is designed to comply with the Area Plan standards that are expected to be in place at the time of approval.

The comment states the EIR/EIS must analyze the scenic effects of the reduced setbacks. The Draft EIR/EIS analyzes the scenic effects of the proposed setback distances in the section titled "Building Heights and Setbacks" beginning on page 9-17. The comment provides no rationale or evidence that the analysis in the Draft EIR/EIS is incomplete or technically inadequate.

82-4 The comment states that the Draft EIR/EIS did not analyze the proposed conversion of CFA to TAUs. Please refer to the response to comment 12-93 which discusses the analysis of this conversion within the Draft EIR/EIS.

82-5 The comment suggests that the Tahoe City Lodge project would displace a number of local businesses that would have no alternative locations to which to relocate. The comment states that the Draft EIR/EIS does not mention relocation assistance and that Placer County should assist the displaced businesses. The comment also notes that without places to eat or things to do, visitors will not wish to stay in Tahoe City. There are no regulations relevant to this project that require the applicant or Placer County to provide relocation assistance for displaced businesses. Because this comment does not raise significant environmental issues and is unrelated to the Draft EIR/EIS environmental analysis, no further response is required. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.

82-6 The comment cites comments made by the Tahoe City Lodge project applicant indicating that Lodge Alternative 2 would not be built. CEQA requires an EIR to discuss "potentially feasible" alternatives that will reduce or avoid a project's significant effects. (Guidelines Section 15126.6(a).) The determination of whether an alternative is "feasible" is made in two stages. (*See Mira Mar Mobile Cmty. v. City of Oceanside* (2004) 119 Cal.App.4th 477, 489-90.) The first step involves identifying a range of alternatives that will satisfy basic project objectives while reducing significant impacts. (*See id.*) When selecting "potentially" feasible alternatives at this stage, the agency must bear in mind that "alternatives need not satisfy all project objectives, they must merely meet 'most' of them." (*Mira Mar,* 119 Cal.App.4th at 489 (citing Guidelines Section 15126.6(a).) In addition, potentially feasible alternatives selected at this stage need only be environmentally superior to the project in some respects. (*Mira Mar,* 119 Cal.App.4th at 490.) Thus, even if an alternative would increase some impacts, it should be

discussed if it would substantially reduce other impacts. (*Id*.) The second stage occurs at project approval, where the decision-maker weighs the relative advantages and disadvantages of the project and the alternatives examined in the EIR, and, if it chooses to reject the alternatives in favor of the project, finds the alternatives to be infeasible. (Public Resources Code Section 21081(a)(3); Guidelines Section 15091.) Alternative 2 was determined to be a viable alternative by the lead agencies and was evaluated as such in the Draft EIR/EIS. If Alternative 2 is selected as the approved alternative, the project applicant would determine whether or not to pursue it.

82-7 The comment makes reference to a Tahoe City Lodge project applicant statement regarding ski shuttles that guests of the Tahoe City Lodge may use, and raises concerns over where those shuttle buses would park on the project site. The statement by the project applicant related to ski shuttles pertains to the possibility of Tahoe City Lodge guests using ski shuttles that already operate in the Tahoe Basin; no new shuttle bus service exclusively for Tahoe City Lodge guests is proposed. (*See* Draft EIR/EIS pages 10-10 through 10-12, and 10-24.) These shuttles are operated by third parties, would not be stored at the Tahoe City Lodge project site, and would likely load and unload passengers at the lodge entrance, rather than parking. As explained on page 10-51 of the Draft EIR/EIS, under certain specific conditions of high peak usage where an event takes place utilizing the golf course conference room space, the lodge or the organizer of the event may choose to provide shuttle service or a number of other measures to mitigate parking impacts, however, the chance that an event with high non-lodge guest usage coincides with a peak golf day is very remote and the use of such shuttles would help reduce traffic generated by Tahoe City Lodge guests.

82-8 The comment states that the only recreation provided by the Tahoe City Lodge project itself would not be available to the public. The comment asserts that the Draft EIR/EIS must assess water use for the pool, hot tubs, and other recreation uses in addition to the water used by the hotel and restaurant. The recreation facilities, which include the fitness center, are part of the lodge buildings; therefore, the water demand for these facilities are included in the total estimated water demand for the lodge alternatives identified in Table 16-4 of Chapter 16, "Public Services and Utilities." The comment is correct with respect to the need for specific analysis of pool and spa water demands; therefore, analysis of pool and spa water demands for the Tahoe City Lodge were provided in a memorandum prepared by Auerbach Engineering Corporation on September 9, 2016. This change is presented in Chapter 2, "Corrections and Revisions to the Draft EIR/EIS," and below. The correction does not alter the conclusions of the Draft EIR/EIS with respect to the significance of any environmental impact related to water supply because this information does not change demand for water supplied by TCPUD and there would still be a reduction in use of water supplied by the on-site well from existing conditions. The correction does not alter the conclusions with respect to the significance of any environmental impact related to wastewater because the preliminary modeling analysis conducted by T-TSA based on the number and types of connections proposed as part of the lodge project included connections for the pool and spas (Auerbach Engineering 2016a:18).

The first sentence of the impact summary on page 16-19 of the Draft EIR/EIS is revised to read as follows:

> Implementation of Tahoe City Lodge Alternatives 1 through 3 would result in a net increase in water demand over existing conditions that ranges between ~~6,962 gpd (2.5 mgy)~~ 7,208 gpd (2.6 mgy) and ~~14,700~~ 14,789 gpd (5.4 mgy).

The last paragraph on page 16-21 of the Draft EIR/EIS is revised to read as follows:

> Total water demand for full occupancy of the lodge and clubhouse is shown in Table 16-4. These estimates are conservative since they assume full occupancy at the

lodge; however, the anticipated average occupancy rate for the year is 69 percent (Placer County 2015). Water demand for the lodge and clubhouse under Alternative 1 would be ~~18,915~~ 19,004 gpd (6.9 mgy) under full occupancy, which includes water demand for irrigation, pool, and spas. This would be a net increase in water demand at the lodge project site of ~~14,700~~ 14,789 (5.4 mgy) over existing conditions.

Table 16-4 on page 16-22 of the Draft EIR/EIS is revised to read as follows:

**Table 16-4 Tahoe City Lodge Project Water Demand and Wastewater Flows**

| Alternative | Water Demand | | Wastewater Flows | |
|---|---|---|---|---|
| | Estimated Demand (gpd/mgy) | Net Change from Existing Conditions (gpd/mgy) | Estimated Flows[1] (gpd/mgy) | Net Change from Existing Conditions (gpd/mgy) |
| Existing Conditions[2] | 4,215 (1.5) | NA | 4,215 (4.7) | NA |
| Alternative 1: Proposed Lodge | ~~18,915~~ 19,004 (6.9) | ~~14,700~~ 14,789 (5.4) | ~~18,315~~ 18,404 (6.7) | ~~14,100 (5.1)~~ 14,189 (5.2) |
| Alternative 2: Reduced Scale Lodge[3] | 11,423 (4.2) | 7,208 (2.6) | ~~10,823 (3.9)~~ 10,875 (4.0) | ~~6,608~~ 6,660 (2.4) |
| Alternative 3: Reduced Height Lodge[4] | 18,915 (6.9) | 14,700 (5.4) | 18,315 (6.7) | 14,100 (5.1) |
| Alternative 4: No Project | 9,231 (3.4) | 5,016 (1.8) | 9,231 (3.4) | 5,016 (1.8) |

[1] Sewer flows are assumed to mirror domestic water usage without irrigation.

[2] Estimated existing water demand and wastewater flows for the commercial uses on the project site are 3,561 gpd (1.3 mgy). Existing flows for the golf course clubhouse are 654 gpd (0.2 mgy). The golf course clubhouse demand does not include golf course irrigation.

[3] Demand is based on ratio of gross square footage between Alternatives 1 and 2 of 68,950:116,683 gross square feet.

[4] Assumes same amenities and fixture counts leading to equal water demand for Alternatives 1 and 3, except there would be no pool or spas.

Source: Auerbach Engineering 2016; Tuma, pers. comm., 2016

The first sentence of the first paragraph on page 16-22 of the Draft EIR/EIS is revised to read as follows:

Water demand for irrigation and the pool at the lodge would be served by the onsite well and would represent a net decrease in demand of ~~3,615 gpd (1.3 mgy)~~ 3,526 gpd (1.2 mgy) for water from this source. Alternative 1 would result in a reduction in use of the water from the onsite well over existing conditions.

The first sentence of the third paragraph on page 16-22 of the Draft EIR/EIS is revised to read as follows:

The net increase in water demand at the lodge site would be ~~14,700 gpd (5.1 mgy)~~ 14,789 gpd (5.4 mgy), ~~600~~ 689 gpd of which would come from a private well, which is not part of TCPUD's supply.

Pertaining to Alternative 2, the second sentence of the last paragraph on page 16-22 of the Draft EIR/EIS is revised to read as follows:

Implementation of Alternative 2 would result in construction of a 56-unit hotel with associated amenities, similar to what would occur under Alternative 1. Alternative 2 would not include reconstruction of the golf course clubhouse. Water demand for lodge Alternative 2, including irrigation, pool, and spa demand, which would be supplied from well water outside of TCPUD supplies, would be 11,423 gpd (4.2 mgy),

> which would be a net increase in water demand at the project site of 7,208 gpd (2.5 mgy) over existing conditions. Alternative 2 would have a lower demand for water than described above for lodge Alternative 1.

With respect to Alternative 3, the first sentence of the second paragraph on page 16-23 of the Draft EIR/EIS is revised to read as follows:

> Implementation of Alternative 3 would result in ~~the same~~ approximately 90 mgd less water demand as that described above for Alternative 1.

With respect to wastewater, first sentence of the second paragraph in the impact summary on page 16-23 of the Draft EIR/EIS is revised to read as follows:

> Implementation of Alternatives 1 through 3 for the lodge project would result in a net increase in wastewater flows over existing conditions that ranges between ~~6,608~~ 6,660 gpd and ~~14,100~~ 14,189 gpd.

The last two sentences of the third paragraph on page 16-25 of the Draft EIR/EIS are revised to read as follows:

> The Tahoe City Lodge project site currently includes commercial uses, the Tahoe City Golf Course, and its access, parking, and accessory uses. Wastewater collection at the project site is provided by TCPUD infrastructure, which carries wastewater flows to the TRI for export out of the basin. Existing wastewater generated on the lodge project site from commercial use is 3,561 gpd and from the golf course clubhouse is 654 gpd for a total existing wastewater demand of 4,215 gpd (see Table 16-4). Implementation of Alternative 1 would result in construction of 118 hotel units, a restaurant, and reconstructed golf course clubhouse, resulting in an increase in demand for wastewater conveyance facilities. The peak day wastewater discharge generated by the lodge would be approximately ~~18,315~~ 18,404 gpd (Auerbach Engineering 2016). Lodge Alternative 1 would result in a net increase in wastewater flows of ~~14,100~~ 14,189 gpd at the project site.

With respect to wastewater flows from Alternative 2, third sentence of the sixth paragraph on page 16-28 of the Draft EIR/EIS is revised to read as follows:

> Implementation of Alternative 2 would result in construction of a 56-unit hotel with associated amenities, similar to what would occur under Alternative 1. Alternative 2 would not include reconstruction of the golf course clubhouse. Wastewater flows generated by Alternative 2 would be ~~10,823~~ 10,875 gpd, which would be a net increase in wastewater generated at the project site of ~~6,608~~ 6,660 gpd over existing conditions.

With respect to wastewater flows from Alternative 3, the first sentence of the seventh paragraph on page 16-28 of the Draft EIR/EIS is revised to read as follows:

> Implementation of Alternative 3 would generate ~~the same amount~~ approximately 90 gpd less ~~of~~ wastewater as that described above for Alternative 1.

82-9 The comment raises concerns regarding the impact of the Tahoe City Lodge project on the commenter's property values, and that the Tahoe City Lodge project would use up all of the "new commodities" being created. The statement regarding value of the commenter's property is not supported and does not raise environmental issues regarding the adequacy, accuracy, or completeness of the environmental document. While it is not clear as to what commodities are referenced in the comment, the Tahoe City Lodge is using a portion of the

density from the Tahoe City Golf Course property being brought into the Tahoe City Town Center. The total area being brought into the Town Center is 4.2 acres, and the Tahoe City Lodge is using approximately 1.7 acres of that area, or about 40 percent of the density attributable to that acreage. The remaining density would remain with the Tahoe City Golf Course for that entity to use as it deems appropriate. The density being used by the Tahoe City Lodge does not preclude future projects from using the balance of the density or "commodities" associated with the Town Center segment of the Tahoe City Golf Course.

With respect to using the easement as the entrance to the lodge for all alternatives, the design follows the recommendations of the county's Tahoe City Mobility Plan (June 2016) that encourages fewer driveway entrances in downtown Tahoe City to improve the safety and mobility of pedestrians. The comment also states that no alternative shows a hotel that does not use the easement. See response to comment 85-1.

82-10 The comment pertains to current traffic activity on the existing easements adjacent to the Tahoe City Lodge project site. The statement regarding a ten-fold traffic increase is incorrect. The LOS (Impacts 10-1 and 10-3 of the Draft EIR/EIS) analysis under CEQA pertains to the operation and traffic delays specifically at the site access/SR 28 intersection, and does not pertain to the volume of traffic, appropriate users, or the allocation of maintenance costs along the easement. The traffic counts of existing conditions at this location reflect all existing uses using the easement access, including the golf course clubhouse. The changes in traffic volumes at the driveway intersection reflect all proposed uses under each alternative (including a conservative estimate of event traffic at the clubhouse) and reflects the proposal under the lodge alternatives to rely on the single access point on the easement. LOS at the site access would be acceptable (LOS B or C) under all alternatives. As the ice rink would generate less traffic in winter than would the golf course in summer, there is no potential that winter traffic volumes would be greater than those analyzed in Impacts 10-1 and 10-3 of the Draft EIR/EIS.

In addition, the comment on 'cut through' traffic that may exist today will be lessened by a more organized parking arrangement and circulation layout as designed in each of the lodge alternatives, and that no vehicular circulation or cut through will occur east of the project as recommended by the county's Tahoe City Mobility Plan (2016) that encourages enhanced pedestrian mobility in downtown Tahoe City with a trail and/or sidewalk infrastructure that connects downtown along the south side of the golf course.

82-11 This comment focuses on the parking supply proposed for the Tahoe City Lodge, and the alternatives considered in the environmental analysis. See responses to comments 12-42 and 19-3, and the revised site plans discussed in Section 2.1.1 of the Final EIR/EIS that show all parking spaces outside of the referenced easement.

The comment expresses a preference for Alternative 2, citing reduced VMT and pollutant loads. The comment is noted for consideration during project review. The alternatives identified for consideration in the Draft EIR/EIS were defined by Placer County and TRPA, and represent a reasonable range of options for the Tahoe City Lodge project site required under CEQA. See Draft EIR/EIS Chapter 3, "Alternatives" for a discussion of alternative selection and a list of alternatives that were considered but ultimately dismissed from further evaluation.

82-12 The comment suggests that the EIR/EIS should include an analysis of the scenic, and public health and safety effects of shadows and shading from the proposed Tahoe City Lodge project on adjacent properties. As described in Section 3.6 of the Draft EIR/EIS, the proposed Tahoe City Lodge project would replace an existing two-story commercial building with four-story lodging buildings. The proposed Tahoe City Lodge buildings are shown in relation to adjacent buildings in Exhibit 3-11 of the Draft EIR/EIS. The effects of the proposed Tahoe

City Lodge project on scenic resources, and public health and safety are analyzed in Chapters 9 and 18 of the Draft EIR/EIS, respectively. 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". The significance criteria that apply to the scenic analysis are listed on page 9-15, and the significance criteria that apply to the public health and safety analysis are listed on pages 18-13 to 18-14 of the Draft EIR/EIS. At four stories, changes in building shadows or shading that could result from the proposed Tahoe City Lodge project would not affect the significance criteria for public health and safety or scenic resources. Therefore, changes in building shading or shadows would not result in a significant effect related to these resources pursuant to CEQA or TRPA regulations.

82-13 The comment pertains to the provision of ADA spaces at the Tahoe City Lodge project site. ADA requirements are not a matter for the environmental analysis, but rather for the standard county plan review process and more detailed improvement plans submitted once a project is approved. Proposed accessible parking space locations are shown on revised project site maps discussed in Section 2.1.1 of this Final EIR/EIS.

82-14 The comment requests that the Draft EIR/EIS evaluate a Tahoe City Lodge alternative that places the main entrance outside of the easement on the adjacent property, which would reduce the number of units to provide the necessary entry. A reduced density alternative (Alternative 2) was analyzed in the Draft EIR/EIS. The lodge alternatives propose to make use of the easement in question in a manner pursuant to the right granted under that easement. See responses to comments 54-1 and 54A-1.

82-15 The comment speaks to the adequacy of fire and emergency vehicle access to serve the Tahoe City Lodge project. Emergency access at the proposed Tahoe City Lodge is discussed in the Draft EIR/EIS on pages 16-41, 16-42, and 18-25. As described in the Draft EIR/EIS, the North Tahoe Fire Protection District (NTPFD) provided a conditional will serve letter to Kila Tahoe, LLC dated January 20, 2016 in response to the Notice of Preparation stating that plan review (for both building permit and improvement plans) would be completed by the District for approval. In addition, Michael S. Schwartz, Fire Chief for NTFPD, provided a comment letter on the Draft EIR/EIS (letter 6 of this Final EIR/EIS) that did not raise specific concerns to providing emergency services to the project alternatives evaluated in the Draft EIR/EIS. For additional discussion see Master Response 6, Emergency Access and Evacuation, of this Final EIR/EIS.

82-16 This comment requests that the Final EIR/EIS provide additional information regarding how snow removal would be accomplished for the Tahoe City Lodge project. The Draft EIR/EIS analyzed the potential water quality impact of snow melt and snow management at the Tahoe City Lodge site (Impact 15-2). The project would be required to manage snow removal in accordance with Section 60.1.4 of the TRPA Code. See also the Conceptual Snow Management Plan, which is Sheet C6 of Appendix A, Revised Tahoe City Lodge Concept Plans, of this Final EIR/EIS.

82-17 The comment expresses dissatisfaction with the design of the Tahoe City Lodge and encourages Placer County not to approve the project. The comment is noted for consideration during project review.

Letter 83

**COMMENTS ON EIR TAHOE BASIN PLAN** ***8/9/16***

*My family owns the* property directly west of the proposed Tahoe City Lodge (243 N. Lake Blvd. –Bechdolt Building APN 094-540-004-000) and I would like to address my comments to the Draft EIR on several points: density, traffic, parking and construction of the project.

Section 5.3.3 of the EIR explains that the project encompasses 3.9 acres. The actual property (APN 094-070-001-000 and 094-070-002-000) amounts to 1.3704 acres as deeded. The balance of the 3.9 acres is a combination of property belonging to the TC Golf Course, TCPUD and 50' of easement (for ingress and egress) of our property. This 50' swath is not buildable nor owned by Kila Tahoe LLC. To present it as anything less than a very egregious land grab would be an understatement. The concept of adding area to the project from non-contiguous and non-owned property sets a poor precedent for future growth of Tahoe City. It would lead one to believe that we could expand our building by two stories and many more square feet if we just consider all of the golf course, and our neighbor's property as shared space and parking.

I have searched the Placer County GIS (see attached maps and spreadsheet) and discovered that the density for tourist accommodations in Tahoe City are quite disparate from what is proposed by the Tahoe City Lodge (TCL.) Alternative 1 of the TCL proposes 118 units on 1.3704 acres. The next closest in size to that parcel would be America's Best Value Inn which has 46 units on 1.2004 acres, which renders the TCL more than twice as dense as a comparable property in Tahoe City. Across the street from the proposed TCL stands Tahoe Marina Lakefront which consists of 48 units on 2.3775 acres rendering the TCL more than four times as dense! Tahoe Taverns and Tavern shores occupy over 34 acres and boast 200 units! The proposed Tahoe City Lodge is **fourteen times** more dense that that. Granlibakken sits on 74 acres and has 180 units. 83-1

Instead of relying on non-contiguous, non-owned property to build the TC Lodge, perhaps fewer units would be more appropriate. It would be more in keeping with current land use and would provide a density that is more suited to Lake Tahoe views and accessibility. One of the overarching principles (#6) from the visioning process of 2013 was to "Recognize the importance of views and access to Lake Tahoe and the Truckee River." Less height and density would be more in keeping with Principle #6.

I understand that Mr. Tuma, on the record at a public meeting last week, announced that if Placer County held him to Alternative 2 of the proposed plan (or 56 units - which seems much more supportable from a density and parking standpoint) that he would abandon the project. As citizens of Tahoe City I think we would all like to see the properties at 255 and 265 N. Lake Blvd. turned into a project that the area could be proud of and would supply us with much needed accommodations, but 118 units is just too many for a parcel that small. 83-2

As for parking? The proposed building utilizes every inch of the deeded parcels and ALL of the parking for the project will be on property owned by others. The symbiosis of Kila Tahoe's project and the MoU concerning provision of a clubhouse and conference facility for the Tahoe City Golf Course is lost on no one. However, the provision of publicly owned lands, paid for by community taxpayers, used to facilitate a private project, in competition with local privately owned businesses sets a terrible precedent.

*It is* no secret to anyone who spends time in Tahoe City that traffic and parking are significant problems. The addition of a minimum 100 cars to park and the added ingress and egress onto Hwy. 28 presents a problem of epic proportions! To the best of my knowledge, Kila Tahoe plans to locate their entrance to the Tahoe City Lodge on the west side of their property along the easement of our property. This driveway already serves both the Bechdolt Building, private residences and the TC Golf Course and it is nearly impossible to exit onto Hwy 28 heading east most of the day. Adding the traffic of a 118 unit hotel to this will be a nightmare. Where is the traffic study? 83-3

The Bechdolt Building houses eight businesses, with at least 23 employees, and a long list of clients. If Tahoe City Lodge plans to utilize our driveway as their own, it will place a tremendous burden our property. I do not believe that a traffic study has been done. The PUD has expressed reluctance at producing one but I feel strongly that one is necessary for

public safety and to preserve the rights of property ownership. Our properties are parked heavily during Thursday Farmer's Market, Wednesday movie nights at Commons Beach and Sunday concerts. (Please see attached photos.) 83-3 cont

I have a laundry list of other concerns: noise from a fourth story pool, bar and deck (alternative 1,) limited access for fire and safety due to lack of access on east side of Lodge, delivery access for proposed restaurant, bar and hotel, loss of view for homeowners on Fairway Dr., loss of parking for golfers (since 90% will be used by Lodge,) added consumption of water and other resources, more cars, more traffic reduction in air quality.... I could go on.

Lastly I would like to address the demolition and construction necessary for the TCL project. Staging for construction should be conducted solely on the property owned by Kila Tahoe LLC. The dust, disruption and added truck traffic will be significant and should not affect surrounding properties. The shared property concept runs contrary to all that private property owners hold dear....privacy, autonomy and ownership. 83-4

Respectfully submitted,

Antionette Rudnick

Sierra Northwest Properties

| Letter 83 | Antoinette Rudnick<br>August 9, 2016 |
|---|---|

83-1 The comment expresses opposition to the use of portions of the Tahoe City Golf Course by the Tahoe City Lodge project within its project area, and the resulting density of the project. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.

83-2 The comment cites comments made by the Tahoe City Lodge project applicant indicating that Lodge Alternative 2 would not be built. Alternative 2 was determined to be a viable alternative by the lead agencies and was evaluated as such in the Draft EIR/EIS. If Alternative 2 is selected as the approved alternative, the project applicant would determine whether or not to pursue it. See also response to comment 82-6.

83-3 The comment raises issues regarding parking at the Tahoe City Lodge and concern with the location of the entrance. This comment is similar to comment 82-11. See response to that comment above. This comment also questions whether a traffic study was prepared. Such a traffic study was conducted, and the results are provided in Chapter 10, "Transportation and Circulation," of the Draft EIR/EIS.

83-4 The comment expresses general opposition and concerns to the Tahoe City Lodge Project and suggests that demolition and construction activities be kept out of the easement located on the commenter's property. The comment is noted for consideration during project review.

**Letter 84**

**From:** Rachel Rudnick <rrudnick@uw.edu>
**Sent:** Monday, August 15, 2016 4:09 PM
**To:** Placer County Environmental Coordination Services
**Subject:** Area Plan Draft EIR/EIS Comments

My name is Rachel Rudnick. I am a local resident, taxpayer, employer, private property owner and a graduate student. I have a vested interest in the success and growth of this community and hope to be a participant in its future.

I am young, but I am also experienced. In the three years I spent as an associate director at a Seattle investment bank, I learned the importance of developing a cohesive strategy. I watched opportunities prosper and I watched them fail. I also learned a great many ways to manipulate data and how easily numbers can be coerced to achieve a desired result. You can support any hypothesis in a statistically significant way with the right assumptions. As a professional I urge you to consider the validity of the information provided in this EIR and the assumptions made to provide it to you. Consider the impact of other projects in development and how easily any variety of outcomes from those works in progress may alter the predictions provided in this report. We have Homewood, Squaw Valley and Martis West to consider and also significant changes occurring in the direction and flow of traffic on highways 28 and 89. How can you predict the environmental impact of this area plan without also considering the effects of this future development? 84-1

In business school, I learned that incentives change behavior. I also learned a myriad of ways these incentives can alter the course of action in a positive and negative way if not properly developed. I assimilated years of evidence based research and analyzed hundreds of Harvard reviewed case studies on implementing change and how the most common failure firms face is growing too quickly without dedicating the appropriate resources to building the infrastructure needed to support their growth and goals. Putting the cart before the horse can ruin an organization faster than almost anything. I agree with the goals and direction this plan intends to take, but fear that the proposed alternatives and mitigations outlined in this EIR are not the most effective ways to get there. These developments are attractive in the short run, but may prove even more problematic in the long run. We were also taught that the most successful leaders prevail most often when utilizing the input from their direct stakeholders. Please consider the input from the community while analyzing this opportunity. If the people of Placer County feel heard, they will support this growth in ways that are absolutely imperative to its' success. As a student, I encourage you to dig deeper than this superficial environmental review and make a truly informed analysis that includes the input from the local community.

As a resident, I must implore you to actually experience our environment in order to analyze these opportunities, to understand how easily data can be manipulated and do not simply accept the information provided in this report as fact. Come to Kings Beach and watch the semi-trucks drive over the new roundabouts because they cannot feasibly drive around them. Try to find a parking spot in Tahoe City at any given time, and if you actually succeed, try again during the Thursday Farmers Market or a Sunday evening concert. Rather than relying on the 2010 census data to assess the housing situation, spend one hour on Craigslist and get a realistic feel for how impossible it is to find a place to live in the basin. Talk to the local business owners and hear the endless stories of how difficult it is to find and retain employees, see the help wanted signs in every window and experience the reduced level of service at local establishments due to the lack of labor force. Sit in traffic for 45 minutes on your way home after working a 12-hour day, when it should take you less than 10 minutes to get home. Consider the local businesses that will have to relocate or close their doors when their office space gets converted to tourist accommodations. I fear the impact to our environment may be more significant than what is indicated in this report and that it may be very 84-2

difficult to truly comprehend this for the decision makers that do not permanently reside in the areas that will be affected by these proposed changes. 84-2 cont

As a private property owner, most notably the owner of the Bechdolt Building in Tahoe City next to the proposed Lodge project, I find it incredibly alarming that the County of Placer appears to be giving permission for a non-local resident to use my personal property without my consent or approval. The Project Boundary mapping includes the Bechdolt property, and allows for the construction of a motel entrance structure onto my property and within an easement. The easement conveys a Non-Exclusive right of access and utilities, thus reserving all rights of use of the easement area, including for parking. The project as defined in this EIR calls for a gross misuse and overburden of this easement and also will eliminate about 15 parking spaces for our tenants that is simply not permissible and a substantial negative impact to my property. No structures, other than a sign for Tahoe City Golf Course, 50' removed from Hwy 28, are allowed. Construction of the lodge entrance and porte cochere within this easement is verboten. The proposed structures must comply with applicable setbacks, as well which are not delineated in the current project plans. 84-3

Finally, as a local resident, taxpayer, employer, private property owner and a graduate student in one, I cannot accept the idea that certain significant impacts such as traffic and congestion on basin highways are unavoidable and cannot be alleviated. The residents of Placer County deserve better from our civil servants and relief from these afflictions. Please consider concrete and realistically achievable solutions to the impacts that you have identified as significant. Simply collecting monetary fees as a mitigation is not sufficient. 84-4

Thank you for your consideration,

Rachel --

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## Letter 84 — Rachel Rudnick, August 15, 2016

84-1 The comment urges Placer County to consider the cumulative effects of projects within the Plan area and the vicinity. An analysis of these potential effects is included in Chapter 19, "Cumulative Impacts," of the Draft EIR/EIS.

84-2 The comment requests that Placer County decision makers spend time in Tahoe City to experience the traffic congestion first hand. The comment is noted for consideration during project review.

84-3 This comment raises concerns regarding location of signage, retention of large specimen poplar trees, lighting, and snow storage on the Tahoe City Lodge site. The project applicant plans to erect signage on the project property, and not on the adjoining property to the west. Most of the large specimen poplars are on the project applicant's property, and are planned to be retained. Lighting would comply with dark sky and all other applicable regulations, consistent with any other development proposals in the Tahoe Basin. Concerns regarding use of the easement on the commenter's property are addressed in response to comment 54-1.

84-4 The comment states that mitigation measures should be identified that achieve LOS standards. Traffic congestion is a region-wide issue that is a result of decades of decisions regarding land use, the desire to limit the size of roadways, limitations on transit funding, and other factors. Standard traffic engineering approaches to mitigating impacts to non-significant levels (such as widening area roadways to four travel lanes) are precluded by TRPA policies and other environmental considerations. Alternatives to greatly expand public transit services have to date been infeasible due to the lack of transit operating subsidy funding. Adoption of the Area Plan would result in lower overall traffic levels (through concentration of land uses to spur additional non-auto travel) in comparison with development under the currently adopted community plans. The mitigation measures identified in the Draft EIR/EIS (beyond payment of traffic/transportation impact fees) include concrete steps to improve mobility conditions, including construction of a pedestrian hybrid beacon at Grove Street to reduce the impact of pedestrians on traffic flow and expansion of transit service.

**Letter 85**

**With regard to the draft EIR of the Tahoe Basin Plan, I have the following comments regarding the proposed Tahoe City Lodge:**

Health and Safety:

A traffic study should be conducted to determine current use and projected increase of flow through easement on west side of TC Lodge project. Kila Tahoe LLC proposes that the easement over property to the west (094-540-004-000 -- Bechdolt Building) grants them rights to ingress and egress. The addition of such a significant amount of vehicles (118 units) requires study. Also, pedestrians who use this path to TART stop, as well as clients and customers of adjoining properties will be at greater risk due to increase in traffic. It is a very busy driveway as it is; the addition of that many vehicles will surely impact safety and requires study. It is nearly impossible to turn left out of this driveway all summer and there is a great deal of foot traffic along that route.

It seems that if the TC Lodge would locate its entrance on the east side of their property many of these issues would be resolved. As the existing building stands it can be accessed from the back or either side. Closing off the easterly entrance and road will exacerbate the traffic issues already inherent in the Bechdolt easement (west side of project,) and the added traffic load may change the use and scope of this easement.

How will fire/emt equipment access the east side of the TCL if needed? The current renderings indicate a turn-around for trucks, but is it sufficient? How will they remove snow from interior of property if it can only be accessed from the west side? What about deliveries to hotel, restaurant and bar?

The driveway on the west side of the project is for benefit of Bechdolt Building tenants and their patrons as well as providing access to the golf course and private homes beyond. Currently this easement is used for parking approximately fifteen vehicles; if TCL intends to use it as an entrance (front door and porte cochere) it will negatively impact the parking capacity of the Bechdolt Building. Kila Tahoe LLC has not maintained this easement, paid taxes on it, paid for snow removal upon it, nor have they insured it. **85-1**

All the maps in EIR and Tahoe Basin Plan need to reflect placement of Bechdolt Building and clearly define the easement that TC Lodge is proposing to use as its driveway/entrance. (See attached survey map for detail with regard to easements, utilities etc.)

Kila Tahoe also has not addressed that their proposed building will be over an existing sewer easement. Will the TCPUD abandon that easement and take private property through eminent domain as they have threatened?

If parking is shared, will the public have access to this 'shared' parking as well? The downtown events (Movies on the Beach, Concerts and Farmers Market) all draw significant crowds who currently use the parking on that easement as well as parking behind the Bechdolt Building and golf course. Will they be displaced by guests of the hotel? The Parking Standards chart (see attached) suggests that 90% of the parking at the golf course property will be used by the hotel and that the parking load will diminish midday and those spaces will be used by golfers. I sit in an office in the Bechdolt building and I can tell you that a large number of those golfers arrive in the early morning. Again, I think a traffic study is critical.

Noise pollution:

Noise abatement will be very important. The increase in vehicular traffic will be measurable and a street side restaurant, bar, and a rooftop pool with a bar have the potential to be loud and a detriment to the peaceful setting of Lake Tahoe. 85-2

Kila Supplemental response 9/2/15 to questions:

Item n: Signage at entrance on west side of project. Kila Tahoe LLC. has no rights to signage at this locale.

Item o: Landscaping..."large specimen poplars" on west side of building retained to mitigate scale etc. Those trees do NOT belong to Kila Tahoe and they have no capacity to guarantee whether the trees stay or go.

Item p: Lighting should not be an eyesore to buildings nearby that are lower than TC Lodge.

Item t: Building will form a central court....where will removed snow go? Everything for this project is planned off site; parking, snow removal/storage, construction staging. Tahoe City Lodge project proposes to utilize surrounding properties with no regard to being a 'good neighbor.'

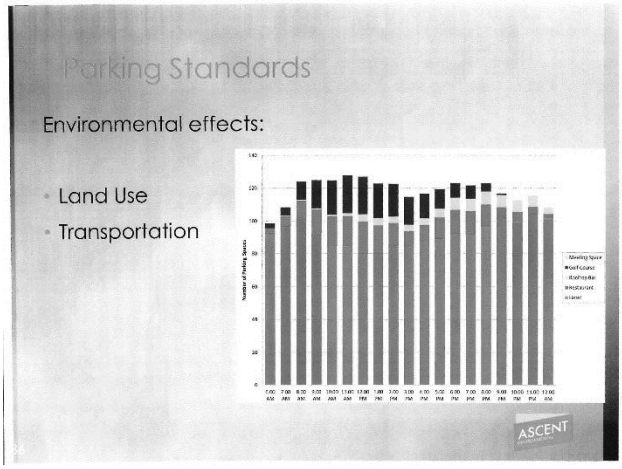
I propose that a block fence following the property line down the west side of Kila Tahoe LLC property would mitigate much of the noise, trespassing by TCL guests on private property and add to safety and security of the Bechdolt Building. Good fences make good neighbors I've been told. 85-3

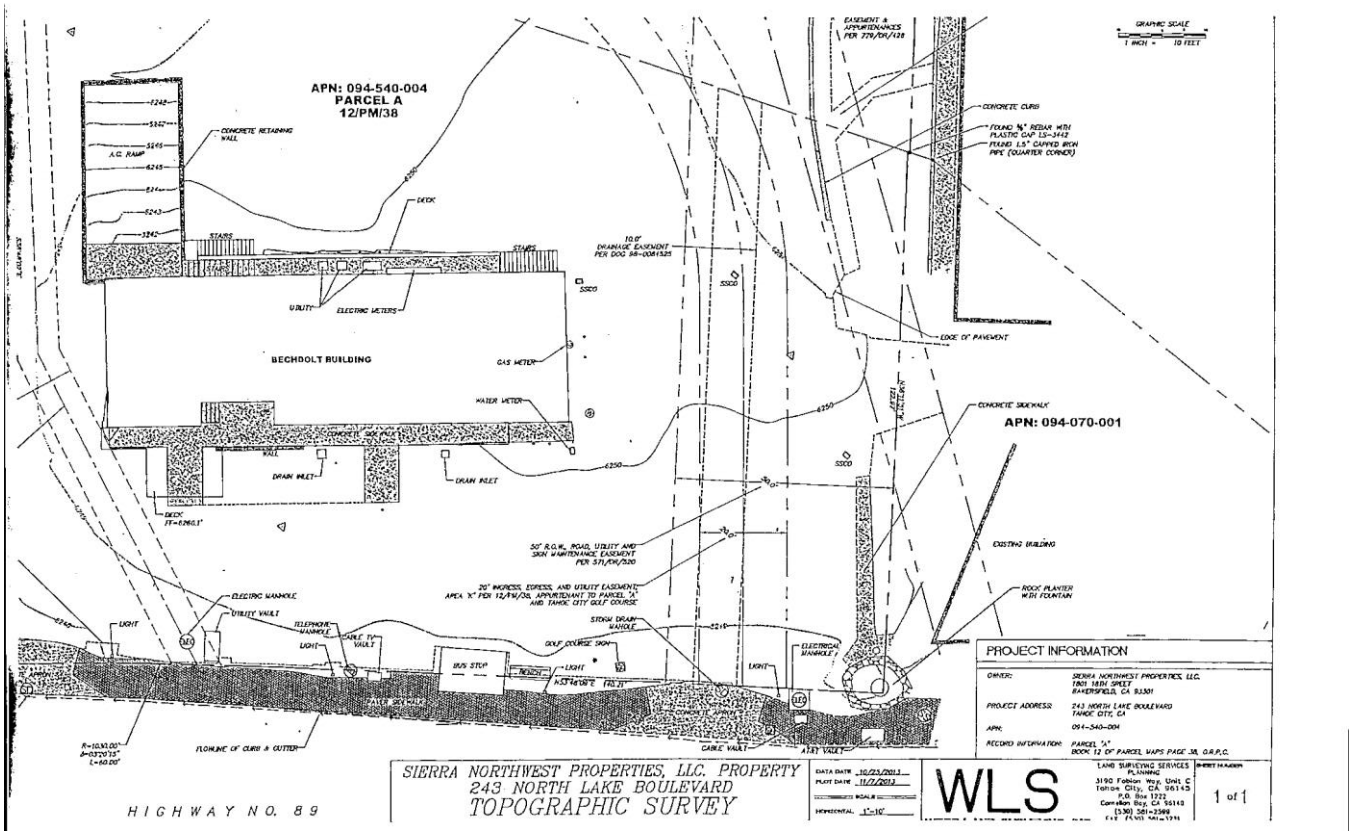
The other issue at hand here is that the TCPUD and Placer county have become ersatz partners with Kila via the sharing of rights, development costs, access, engineering etc. It is a wonderful thing that Kila Tahoe wants to provide the area with a conference center and build a clubhouse for the Tahoe City Golf Course. It is not a wonderful thing that the PUD and County are paving the way for Kila Tahoe to usurp benefit of neighboring properties and the owners of same. Since Kila Tahoe has ingratiated itself to both governing bodies, it leaves little or no recourse for those of us who own nearby property. The very entities that should be advocating for our private property rights are benefitting directly from this project which renders them unavailable to the citizenry who fund and elect them.

Sam Rudnick,

Sierra Northwest Properties

530-583-1068






| Letter 85 | Sam Rudnick<br>No date |
|---|---|

85-1 The comment states that a traffic study should be performed to determine the flow of traffic through the easement over the commenter's property. Such a traffic study was conducted, and the results are provided in Chapter 10, "Transportation and Circulation," of the Draft EIR/EIS. The comment goes on to suggest that the entrance to the Tahoe City Lodge should be relocated to the east side of the project site. This option was studied and rejected by the project applicant for the several reasons. First, the Implementing Regulations for the Area Plan state that curb cuts should be "[m]inimized and in areas least likely to impede pedestrian circulation." See Table 2.04.A-5 of the Implementing Regulations. Adding a second driveway on the east side of the project would necessitate a second curb cut into a sidewalk used heavily by pedestrians. Additionally, page 123 of the Implementing Regulations discusses shared access, encouraging "…shared parking and shared access points on public streets, new parking facilities should be designed to accommodate cross-access to/from adjacent properties to allow parking areas to become joint use facilities…." The current design with access through the easement is consistent with this discussion while access to the east side of the project site and creating a second access point would not be. Finally, moving the driveway to the east side of the project would have significant adverse impacts on the project, eliminating much of the buildable area of the site, and turning the central courtyard into a roadway. As a result, and because a driveway on the east side of the property would not reduce any of the project impacts, the project applicant chose not to pursue a driveway on the east side of the property.

This comment also raises concerns regarding fire/EMT access, deliveries, and snow removal. Deliveries would be accomplished via the designated access at the rear of the property. See response to comment 82-15 regarding fire/EMT access. Snow from the interior courtyard

would remain in that courtyard for snow storage purposes. See also the Conceptual Snow Management Plan, which is Sheet C6 of Appendix A, Revised Tahoe City Lodge Concept Plans, of this Final EIR/EIS.

This comment also raises the concern regarding a sewer easement. The project applicant is working with TCPUD to develop an alignment that is acceptable to the project applicant and TCPUD, and the alignment would be resolved as part of the final design and improvement plan approval by Placer County.

The comment also raises concerns regarding parking capacity. See the responses to comments 12-42 and 19-3.

85-2 The comment states that noise abatement will be important, that the increase in traffic noise will be measurable, and that the noise-generating activities on the rooftop terrace of the Tahoe City Lodge could be a detriment to the peaceful setting of Lake Tahoe.

Traffic noise impacts, including increases in traffic noise levels along highway segments in the Plan area, are addressed under Impact 13-1, which begins on page 13-18. The program-level analysis of traffic noise for the Area Plan concludes that, because TRPA would only approve individual projects that can demonstrate compliance with TRPA's CNEL thresholds (TRPA 2012c:3.6-16), this impact would be less than significant for the purposes of TRPA and CEQA environmental review. The project-level analysis of the Tahoe City Lodge Alternatives 1, 2, and 3 explains that development of the lodge would generate fewer vehicle trips than under existing conditions, which means lodge operations would not result in any traffic noise increases. For the no project alternative, Alternative 4, an increase in vehicle trips from the site would result due to expected renovation of the existing commercial center, resulting in increases in traffic noise levels.

Please refer to response to comment 19-2 for discussion about the potential impact of noise-generating activities on the rooftop terrace of the lodge. This includes revisions to Impact 13-5, as well as noise abatement measures under Mitigation Measure 13-5.

85-3 The comment raises concerns regarding the location of signage, retention of large specimen poplar trees, lighting and snow storage. The project applicant plans to erect signage on its property, and not on the adjoining property to the west. The majority of the large specimen poplars are on project applicant's property, and are planned to be retained. Lighting would comply with dark sky and all other applicable regulations as is consistent with any other development proposals in the Tahoe Basin. Snow from the interior courtyard would remain in that courtyard for snow storage purposes. See also the Conceptual Snow Management Plan, which is Sheet C6 of Appendix A, Revised Tahoe City Lodge Concept Plans, of this Final EIR/EIS.

The comment proposes a block fence along the west side of Kila Tahoe LLC property. Such a fence would impede access to the project site and interfere with existing easement rights.

The portion of the comment referring to the relationship between the project applicant and the TCPUD does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document.

Nancy Ryan
PO Box 5955
Tahoe City, CA 96145
530.448.9017
jersey.n4@gmail.com

**Letter 86**

August 3, 2016

Placer County Community Dev. Res. Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn CA 95603

To Whom It May Concern:

I am writing this letter to voice my objection and to address the many issues with the proposed shared-use path that is being proposed to connect Commons Beach to Fanny Bridge in Tahoe City.
As a full time resident of Tahoe City, I understand the flow of traffic and shared use traffic here. One of the first issues to be addressed here is that a water-side, shared use path would create a very dangerous situation for us owners, of Tahoe Marina Lakefront, with more than 1600 people using the proposed path on a peak day. Our families and guests, including children and elderly, would have to cross the path to move between our grassy play and area and our beach.
Secondly, our security would be compromised, as the proposed path would be within feet of some of the Tahoe Marina Lakefront units.
Also, the environmental impact of wide paving on the pristine shoreline would be a travesty. We protect our lake and shoreline, not pave it.
Our proposed recommendation is to return to the September 2015 Area Plan shared-use path alignment that goes behind Tahoe Marina Lakefront and is set back from the road. This is the best plan for several reasons. Local businesses, owned by people like us, will benefit from increased pedestrian and cyclist traffic. Tahoe City has been focusing on how to increase pedestrian flow through its restaurants and shops. Here is a great solution! In addition, the shared-use path set back from the road will save the county as it could be implemented more quickly and in a less costly manner. And, the public would still retain current access provided by the Tahoe Marina Lakefront, ~650 feet on the southerly boundary of the property.
In conclusion, I am asking for your support in voting for the September 2015 Area Plan shared-use alignment that goes BEHIND Tahoe Marina Lakefront, set back from the road.
I attended this meeting on Thursday evening in Kings Beach and would like to go on the record that I agree with Mr. White. I didn't have time to wait to make my comments after the meeting. Also, I sent this letter via US Mail too. 86-1

Best,

Nancy Ryan
270 North Lake Blvd., #18
Tahoe City, CA 96145

| Letter 86 | Nancy Ryan<br>August 3, 2016 |
|---|---|

86-1 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and concern regarding the potential adverse impacts associated with this shared-use path alignment. In addition, the comment suggests an alternative location for the shared-use path alignment. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

Letter 87

William R. Sage
Tahoe Marina Lakefront Condominiums, Unit 42
109 Valley Oaks Drive
Alamo, CA 94507

RECEIVED
BOARD OF SUPERVISORS
5BOS ✓ TL ✓ ALL AIDES ✓ (mail person) UK
AUG - 1 2016
SUP____ COB Corr ✓ CoCo____
AIDE____ CEO ____ Other____

July 26, 2016

Mr. Jack Duran
Placer County Supervisor, District 1
Placer County
175 Fulweiler Avenue
Auburn, CA 95603

Dear Mr. Duran:

I purchased my unit at Tahoe Marina Lakefront Condominiums in 1977 as a second home for my family. I remember paying a lot more compared to other property in the Tahoe area because it was very private and was lakefront.

I believe we have waited way too long for this missing piece of the walking-bike path to be built. Many have written to you discussing their concerns about the proposed lakeside path. I, too, share those concerns and opposition to the lakeside route. Therefore, I would like to address the problems from a practical prospective.

If you insist upon using the lakefront location to build the path, you will continue to delay its construction for many years and will be wasting taxpayers' money.

In 2002, as a director of our association I met with an official of Tahoe City PUD. At that time, we agreed that the lakeside option was not practical and the land option would be the better way to go. We just needed to work out the details. But, within months, Placer County in conjunction with the TCPUD attempted to blackmail TML into granting a lakeside easement for the path. Litigation followed. After over a year, a summary judgment was granted in our favor. Much time had been wasted and a lot of taxpayers' money had been spent. 87-1

At that time, our attorneys said that condemning residential property for a walking-bike path was not legal. In looking at the existing trail map, one cannot find a single incidence where the trail goes through a residential backyard or between a residence and the lake. Should you decide to choose the lakeside path, we will fight it and let a court decide if you can condemn our property for that use. Other lakefront owners would be interested if you were to choose to pursue condemnation as such action could put all of their properties at risk, as well. This litagation would be costly to both sides and could take years to reach a final judgment, once again postponing the completion of the path for all that time and once again wasting a great deal of taxpayers' money.

Should you prevail after a lengthy and expensive court battle and begin condemnation to acquire the easement, you will be required to compensate the owners fairly. I suggest that your proposed estimate of compensation will be insufficient. We would then return to the courts to determine what fair compensation would be. Then consider what you would be asking to have happen: a public path between our units and the lake. I have heard that as many as 1600 people use the path daily. For safety and privacy reasons, you should be required to put up a fence between the path and our units. Our children playing in their backyards just feet from their units should not be able to be run over by bikes flying by. The homeowners could have people walking by, peering into their master bedrooms just feet away. Some of the units have master bedrooms very close to the lake. The proposed path would be within feet of their units and there is not enough existing land needed to build the path. This part of the fence would have to be solid and would cut off any homeowners' views of the lake. In fact, some units would not have any space at all between their patios and the fence. The fence would have to have gates so the owners could access our private beach. Yes, our *private beach.*

When we bought our land from Lands of Sierra, we also bought the beach. It belongs to us and is not available for the public use. So you would need to fence it from the path. The area between the lake and the buildings in some places is smaller than the width of the path. This would require extending the level area for the path into the lake bed, so now you are building into the lake. This, too, would require a fence or barrier for safety reasons so that bikers and walkers wouldn't fall into the lake. The result is that the path is fenced on both sides, actually defeating the entire purpose of having the path along the lake. 87-1 cont

Now let's see who benefits from this pipe dream.
**(1) The taxpayers?** No. They will have spent tens of millions of dollars for this small piece of the path. Best use of their (not your) money?
**(2) The users?** Perhaps. But consider that many using it are tourists who don't pay taxes and really don't care if this part of the path is on Mackinaw Road. The entire path on Highway 89 is not lakefront. The path leading east on North Lake Boulevard is not lakefront, except the area along the cliff by Commons Beach and the commercial area around the Marina. Will the tourists feel cheated if they don't have our little piece of land? Of course not. And the local taxpayers who do use the path: it will be years, perhaps a decade before this path would be completed. It will not be so scenic as you imagine with fences on both sides. Perhaps if they knew the huge costs and delays that will be incurred, they would be satisfied with the short land route along Mackinaw Road and you could use their money for a better cause.
**(3) TML homeowners?** No, we will have our way of life destroyed. We will be the only people who have paid for lakefront property only to have no unfettered access to the lake.

I urge you to drop this folly and move forward with the land option. Please ask yourselves if the proposed lakefront path is right. Would you put this path right outside *your* bedroom door?

Thank you for your consideration.

William R. Sage

| Letter 87 | William Sage<br>July 26, 2016 |
|---|---|

87-1 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and concern regarding the potential adverse impacts associated with this shared-use path alignment. In addition, the comment suggests an alternative location for the shared-use path alignment. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

Letter 88

STUART W. SEILER Insurance Consultant

704 Junipero Serra Boulevard
San Francisco, CA 94127
(415) 333-4158
Fax (415) 841-1614

RECEIVED BOARD OF SUPERVISORS stuartws33
5BOS TH ALL AIDES (mail person)
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SUP COB Corr CoCo
AIDE CEO Other

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive-Suite 190
Auburn, CA 95603

RE: The Draft Environment Impact Report (DEIR)
Placer County Tahoe Basin Plan and Tahoe City Lodge
Project June 2016 Report Prepared by Ascent
Environmental, Inc.

Ladies and Gentlemen:

My wife and I own Unit 25, a lakefront property, which we purchased in 1985 and I have served on the Board of Directors for approximately 20 years and served as president for two years. We have reviewed the subject DEIR and comment as follows:

1. It would be safer for everyone using the water-side, shared use path that it be removed from the Area Plan as it would create an unsafe condition as it is used by several hundred people on a peak day. This would be hazardous to adults and children as they would have have to cross thru significant traffic.

2. There could be significant damage to the Lake environment. This would also be significant impairment to Tahoe Marina, its owners and guests.

3. Tahoe Marina Owners and guests would be significantly disturbed by the use of a path of this nature as well as the area in general

88-1

4. It appears that the path would run very close to some of the PML units and could impair their view of the lake and their peace and quiet while in residence.

5. The shared use path would result in a serious encroachment on Tahoe Marina's property which could result in lengthy and expensive actions for both entities. The alternate (green line month map plan) would infringe on Tahoe Marina minimally, is more acceptable to me as an owner as well other owners that I have spoken with.

I would hope that all representative Agencies involved would revisit this issue and all parties would agree on a Shared use plan that would be acceptable to all parties. As a long time owner I love Lake Tahoe and want to see that it remains a beautiful and wonderful treasure that it is which provides the maximum benefit to all residents and visitors.

Thank you for considering my comments and enjoy a terrific Summer.

Sincerely,

Stuart W Seiler
Past President, Tahoe Marina HOA

Cos:
Ms Jennifer Montgomery-Placer County Supervisor District 5
Mr. Jack Duran-Placer County Supervisor,District11
Mr Robert Weylandt -Placer County Supervisor District 2
Mr Jim Holmes-Placer County Supervisor District 3
Mr Ken Uhler-Placer County Supervisor District 4

| Letter 88 | Stuart Seiler<br>August 1, 2016 |
|---|---|

88-1 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and concern regarding the potential adverse impacts associated with this shared-use path alignment. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

**Letter 89**

**From:** Mary Anne Semrau <masemrau76@gmail.com>
**Sent:** Monday, August 15, 2016 5:54 PM
**To:** Placer County Environmental Coordination Services
**Subject:** TO: PLACER COUNTY

RE; PLACER COUNTY TAHOE BASIN - WATER-SIDE SHARED-USE PATH FROM COMMONS BEACH TO FANNY BRIDGE

My Family Has Been Homeowner's Of TML Unit # 36 Since The Very Beginning. At One Time They Also Owned Unit # 34.
My Family Eventually Sold Unit # 34, Because We All Loved Unit # 36 So Much. I Have Very Fond Memories Of Walking Through The Skeleton Of TML Unit # 36, Thinking, What An Absolute Awesome Place To Stay With Families And Friends. This View Is Amazing!!!!

Over The Years We Have Enjoyed Many Family Holidays And Vacations, We Would All Love To Be Out On The Deck Or Downstairs On The Patio Enjoying A Meal Or Snack And Never Stop Adoring Our View And Our Privacy. I Cannot Imagine Having An Intrusive Bike Path Just Outside The Guest Bedrooms, Master Bedroom And Master Bathroom. This Can't Be Possible There Is No Space On Our Side Of Unit # 36 To Implement A Bike Path That Would Be Unsafe And Extremely Dangerous. Also This Would Be A Tremendous Violation Of Privacy For My Family And Any Renters As Well As All TML Homeowner's And Their Families And Guests. My Family Is Strongly Against This Shared-Use Path. This Shared-Use Path Would Cause An Adverse Effect To The Peaceful Setting That It Was Meant To Be For Children And Parents Who Like To Play On The Grassy Area As Well As Walking To Enjoy The Pier And Walking To Use The Swimming Pool And Tennis Courts. Again, This Shared-Use Path Is Not SAFE And Would Be A Huge LIABILITY To All Of TML Private Property Homeowner's. 89-1

We As Homeowner's Know That The TML Lakefront Could Never Be Able To Handle The High Volumes Of Bikers And Walkers. Our Patios Would Be In Danger Of Our Personal Items And Furniture Being Stolen, In Addition To The Noise And Garbage. Please Remove This Shared-Use Path From The Ballot.

We All Want To Keep TML Flourishing In The Future With Many Generations Of Families Enjoying This Unique And Very Beautiful One Of A Kind Place. This Shared-Use Path Would Be A Definite Detriment To All TML Homeowner's And Guests.

Again, Please Remove This Shared-Use Path From The Ballot.

Thank You For Your Consideration In This Very Important Matter.

Sincerely, Mary Anne Semrau, Unit # 36, Family Trustee.

## Letter 89 — Mary Anne Semrau, August 15, 2016

89-1 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and concern regarding the potential adverse impacts associated with this shared-use path alignment. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

Letter 90

August 12, 2016

Dear Placer County Community Development Resource Agency,

This letter is in response to the plan to create shared-use path that connects Fanny Bridge to Commons Beach in Tahoe City, California. I am requesting that your agency **exclude** the alternative plan to create a water-side shared-use path in front of the Tahoe Marina Lakeside (TML).

The Commercial Side Route Alternative provides many benefits for Tahoe City. This path is cheaper and will take less time to create (Mackinow Road is already leveled), is easier to maintain, can provide a safer width for the public, has less environmental impact than a public path on the edge of the lake, and provides better access to Tahoe City businesses.

My family has been homeowners at TML since 1971. Once owned by my parents, it is now in the family trust. It has been a destination for relaxation and fun for generations, from my parents to their great-grandchildren. We have paid our taxes for the property and have been good citizens for Placer County.

My family's property at Tahoe Marina Lakeside is unit 36. A water-side shared-use path would go **within feet** of our property. This would be a severe encroachment of TML's private property and would require a lengthy and expensive eminent domain process. 90-1

My family and I are all concerned about the safety a water- side shared-use path would cause. I frequently walk and ride my bike on the current shared-use path from all directions of SR 89/28. A variety of bikers use the path from families with kids using training wheels to the professional-looking adult riders who speed. Walkers have to be cautious of those riding bikes and vica versa. A water-side shared-use path would be dangerous and chaotic for those using the path, and those staying and using the facilities at TML.

Also, a water-side shared-use path would severely impact the security and privacy for my family along with all the other TML owners. During the peak season, it has been estimated that more that 1,600 people will be using the shared-use path per day. At Unit 36, we have already experienced people using our bottom patio as a place to hang out and drink, and this is without a shared-use path open 24/7 right in front of our property.

I ask that you reflect all that I have stated and **exclude** the alternative plan to create a water-side shared-use path in front of the Tahoe Marina Lakeside (TML). 90-1 cont

Thank you for your time and consideration.

Sincerely,

Elizabeth Diane Semrau

Elizabeth "Diane" Semrau
650-996-9868
frwluv3@yahoo.com

| Letter 90 | Elizabeth Semrau<br>August 12, 2016 |
|---|---|

90-1 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and concern regarding the potential adverse impacts associated with this shared-use path alignment. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

Letter 91

Laurence J. Shaw, PhD
3627 Sacramento Street
San Francisco, CA 94118
integralpatent@gmail.com
415-812-6203

RECEIVED AUG 15 2016 PLANNING DEPT.

August 10, 2016

Crystal Jacobsen
Placer County Community Development
3091 Country Center Drive
Auburn, CA 95603

TRPA
P.O. Box 5310
Stateline, Nevada
89440

RE: Comments on the Tahoe Basin Area Plan/EIR/EIS (Kings Beach)

Dear Tahoe Planners,

I am a co-owner of the property at 7750 North Lake Blvd. Currently, the eleven properties from 7708 to 7840 North Lake Blvd. are one- or two-story single-family homes, and there are a number of large trees on the properties. I am writing to express my concern that a portion of Kings Beach (which includes the strip of eleven houses) has been zoned for multi-use, which allows for substantial development.

**The multi-use zoning allows development which is not at all in the spirit of Keep Tahoe Blue and should be changed.** Under the multi-use zoning, five-story buildings with dozens more units per acre may be built. Development of that sort would result in a substantial change in appearance from the lake, from the beach, and from the road. Rather than being a somewhat wooded area with relatively low buildings, it could become a strip of high rises. (The resulting increase in population would presumably also increase the environmental burden on the lake.) 91-1

Clearly, there are financial interests involved in maximizing the number of units on Kings Beach so as to maximize profits. (It is worth noting that it would even be in my financial interest to have such development.) However, this is not in the best interest of the Lake. I urge you to act in the interest of Lake Tahoe rather than the financial interests of developers.

Sincerely,

Laurence J. Shaw

| Letter 91 | Laurence Shaw<br>August 10, 2016 |
|---|---|

91-1 The comment expresses opposition to the Mixed-Use zoning of the portion of the Kings Beach Town Center south of SR 28 and west of Secline Street. Please see Master Response 4, Kings Beach Zoning and Shared-Use Path along Brockway Vista Avenue, in Section 3.1 of this Final EIR/EIS.

Leonard Shaw
595 Fairway Drive
Novato, CA 94949

RECEIVED
AUG 01 2016
PLANNING DEPT

Letter 92

tel: (415) 883-0120
fax: (415) 883-8255
email: ljshaw1@comcast.net

July 27, 2016

Crystal Jacobsen
Placer County Community Development
3091 County Center Drive, Ste. 140
Auburn, CA 95603

TRPA
128 Market Street
P.O. Box 5310
Stateline, NV 89440
ATTN: Luca Maloney

League to Save Lake Tahoe
2608 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150
ATTN: Shannon

Tahoe Lakefront Owner's Association
P.O. Box 7073
Tahoe City, CA 96145

RE: Tahoe Basin Area Plan/Zoning

Our family has owned a single family lakefront property located at 7750 North Lake Blvd. in Kings Beach (Tahoe Vista) since the early 1950's.

We are unable to attend the July/August public hearings on The Draft Plan and we request that this letter be provided to the Commission or Council holding the hearings.

We are concerned about, and opposed to, the Mixed Use Residential (MU-R) zoning for our area that is apparently contemplated by the Draft Area Plan, and we are urging that this intensified zoning designation be reconsidered and changed. 92-1

We and many of our neighbors who own single family properties in what has been a unique enclave along the lakefront in the area westward from the Ferrari Crown Motel to the Edgelake Resort property, feel that this area should be zoned single family residential, and we are requesting that the Draft Plan be amended to reflect this predominant existing use.

We are concerned that MU-R zoning would provide a strong incentive for developers to acquire contiguous single family dwellings and to pursue more intensive high density multi-family, condominium, timeshare, motel or other similar uses in this locale. We believe that not only would such intensified usage damage our useful enjoyment of our property, but it would also be environmentally ill advised and harmful.

We know that TRPA and the League to Save Lake Tahoe have long been dedicated to maintaining and preserving the visual beauty of the beachfront as viewed from the lake. The kind of development that we fear would result from MU-R zoning would run contra to what these organizations have striven to achieve and preserve. 92-1 cont

Thank you in advance for your consideration of our concerns and our requested single family zoning designation.

Very truly yours,

Leonard Shaw

LEONARD SHAW

Judith B Shaw

JUDITH B. SHAW

| Letter 92 | Leonard and Judith Shaw<br>July 27, 2016 |
|---|---|

92-1 The comment expresses opposition to the Mixed-Use zoning of the portion of the Kings Beach Town Center south of SR 28 and west of Secline Street. Please see Master Response 4, Kings Beach Zoning and Shared-Use Path along Brockway Vista Avenue, in Section 3.1 of this Final EIR/EIS.

**Letter 93**

**From:** Hal Slear <hslear@sbcglobal.net>
**Sent:** Monday, August 15, 2016 5:21 PM
**To:** Placer County Environmental Coordination Services
**Subject:** Comment on Draft EIS/EIR Area Plan + Tahoe City Lodge Project

[To Whom it May Concern]

I am a forty one year resident, property and business owner in Tahoe City. I am the current President of the Kiwanis Club North Lake Tahoe and I serve on the Board of Directors for the Tahoe City Downtown Association. I am an active member of the NTFD CERT group.

I have reviewed the Draft EIR/EIS for the Placer County Tahoe Basin Area Plan and the Tahoe City Lodge Project, and would like to have you include my comments for both the Plan and the Lodge Project. I believe that the EIS/EIR process has adequately addressed my concerns about any potential environmental impacts that could occur for the various alternatives outlined for both the Area Plan and Lodge Project.

Here is why I support Alternative **1 for Proposed Area Plan:**

- I believe we need to support walkable downtown centers and the new area plan policies focus on this by allowing for increased density and height. This in turn offers environmental benefits such as better water quality management and lower VMT's.
- I support the policy focus on preservation lands for recreation such as demonstrated with the deed restriction on the Tahoe City Golf Course. Not only will this be good for locals and visitors because it improves a recreational amenity close to downtown but it also triggers great stream area restoration work, which again, is good for Lake Tahoe clarity goals. 93-1
- I really, really like the policy concept that is looking at allowing for a secondary dwelling unit program. This is very forward thinking and actually makes sense for workers and locals who would appreciate a way to offset expensive living costs. We might discourage people from leaving the area when they retire if they could build a rental unit to augment their income. I see this as a win- win for lots of locals. It's not a total solution but it offers one tool in a toolbox of solutions to our housing issues.

I also strongly support the Tahoe City Lodge Project, Alternative 1, which allows for the full project to move forward because of the following reasons:

- **Height**: At first I was concerned about the four-story concept I heard about because I thought it would be too much for little Tahoe City. But, after reviewing the EIS/EIR sections on the height of the hotel, looking at renderings, reading about traffic generation compared to the current site, and looking at the plans for stream zone improvements – I learned that the four

1

stories is only for the SR 28 section and really the 4th floor will be the roof top bar area. Most of the rest of the hotel is more along the two-story level.

- **Way Better Than Current**: The property, as it exists now is ugly, bad for the lake and the environment, and not beneficial to the community as it affects visitors perception of the town and is largely vacant, rather than housing businesses that could contribute to our economy. The way things are today on that property isn't acceptable, and the proposed hotel is exactly what our community needs.
- **Streamzone Improvements**: The stream zone improvements that would come with this project are critical – everything we can do to maintain and improve Lake Tahoe's clarity is key to maintaining why we live here and why visitors come here.
- Parking: I was concerned about parking, but after reviewing the draft EIR/EIS, I'm satisfied that the arrangement will work between the hotel and golf course. It won't cure all of Tahoe City's parking problems, but sufficiently addresses its own impacts to parking.

93-1 cont

I appreciate the opportunity to review these documents and give my input.

Harold Slear
P.O. Box 6893
Tahoe City, CA 96145
hslear@sbcglobal.net

**Hal Slear**

| Letter 93 | Harold Slear<br>August 15, 2016 |
|---|---|

93-1 The comment expresses support for the Area Plan and the Tahoe City Lodge project, specifically Alternative 1. The comment is noted for consideration during project review.

Letter 94

August 11, 2016

Clark G. Sperry
270 North Lake Blvd.
Tahoe City, CA 96145

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

re: Draft Tahoe Basin Area Plan Draft EIR, Tahoe City Lodge

I would like to address two items regarding the Tahoe City Lodge project included in the above referenced DEIR.

1) Parking, parking, parking. Do I need to say more. I'm no parking engineer but whoever sold you this can't be either. One hundred and eighteen units with only 42 adjacent parking spaces close to the building and an additional 20 within a short walk. They must be kidding. The hotel, the condos, the restaurant, the conference facilities, the golf course, an ice rink and cross country skiing. Are those some kind of magic parking spaces? Everyone in town is in favor of this facility so figure out how to do it right. Parking will be a problem and it should be easier to fix it now than later. 94-1

2) The rooftop facilities need to be eliminated. If it's OK to occupy the roof then enclose it with a roof and walls, ie. another floor if that's what it takes. As neighbors, we would prefer not to see, hear, or share their outdoor party every night. 94-2

Thanks for your indulgence,

Clark G. Sperry

| Letter 94 | Clark Sperry<br>August 11, 2016 |
|---|---|

94-1 The comment pertains to parking impacts of the Tahoe City Lodge. See response to comment 12-42. The parking supply available for the Tahoe City Lodge would total 132 spaces. These spaces would be shared with the golf course/winter sports park. Evaluation of the summer uses on the golf course (detailed in Impact 10-8, beginning on page 10-48 of the Draft EIR/EIS) indicates that parking demand (peaking in the middle of the day when hotel parking needs would be relatively low), would be up to 26 spaces, leaving at least 105 spaces for hotel uses. The *Tahoe City Winter Sports Park Seasonal Ice Rink Initial Study MND* (TCPUD 2016) indicates that a maximum of 23 spaces would be required for winter uses, again peaking in the middle of the day. Restrictions have been developed for conference uses to such that they occur either when adequate parking is available, or that parking management strategies (such as off-site parking) are instituted. With these restrictions, the overall project would provide parking equal to or exceeding the shared parking demand at all times and in all seasons.

As some of the shared Tahoe City Lodge/golf course parking spaces are a substantial distance from the lodge, some drivers can be expected to park in more convenient, existing public parking spaces along SR 28 and in the public parking lot across the highway from the site, and be tempted to park in nearby existing parking areas (as occurs today). Note that SR 28 curb spaces are limited to 2 hours only during the day, overnight parking on SR 28 is prohibited in winter, and Tahoe Marina Lodge parking is already signed and chained to prohibit parking by others. See also response to comment 12-42.

94-2 The comment expresses an opinion that the rooftop facilities associated with the Tahoe City Lodge need to be eliminated or enclosed so residents at the Tahoe Marina Lakefront property are not exposed to noise. This comment is similar to comment 19-2. See response to comment 19-2 regarding outdoor noise sources related to the Tahoe City Lodge.

Letter 95

Clark G. Sperry

270 North Lake Boulevard #26

Tahoe City, CA 96145

Placer County Community Development Resource Agency

Environmental Coordination Services

3091 County Center Drive, Suite 190

Auburn, CA 95603

re: Draft Tahoe Basin Area Plan, Public Review Draft, June 2016

I am writing in regard to the preferred alignment of the multi-use trail referred to in the above referenced DEIR. My wife and I purchased our condo at Tahoe Marina Lakefront Condominiums in July of 1999 and our family has enjoyed spending as much of our summers and winters at Lake Tahoe as the ownership of a family business in Sacramento would allow. As long as we have lived at Tahoe, the completion of the multi-use trail has been a topic. Sometimes on the front burner and sometimes the back. With the issuance of this DEIR it seems to be back on the front burner with completion of the long awaited missing link becoming a reality.

My concern is that in previous Area Plan and Mobility Plan documents for public review there were several different alignments proposed. Now the preferred and only alignment being considered seems to be the one bisecting our property from one side to the other at the shoreline. Even more disturbing is the fact that I have been on the TML association board for the last eight years and although I don't believe we are too hard to find, no one representing the individuals proposing this alignment ( which is a bold and frankly unilateral attempt to steamroll this bike trail through our private property, forever affecting our safety, our security, and

95-1

our way of life, as well as that of the public), have ever come to us and offered to sit down and see if we could possibly come to agreement on a location that we could all live with. Instead, they have done exactly the opposite. Just put it on paper and maybe somehow it will become so.

I do not believe that this approach as taken in the Area Plan is going to best serve the interest of Placer County or make for any kind of a lasting friendship. I am going to state right now that I do not feel Placer County is in any way the driving force behind this alignment. Unfortunately, I can't say the same for the Tahoe City Public Utility District. I suspect the lakeside alignment is the one and only alignment preferred by the TCPUD. For whatever reason they have been totally focused and unbending in their desire over the years to run this trail right through TML property thus totally ignoring any other economical alternate or practical route. They have been in the past and continue to be extremely passively antagonistic and totally nontransparent in any and all dealings they have had with us at TML. Because of this and other incidents in the past, our relationship with the TCPUD has suffered because there is not the needed level of trust. I would regret seeing Placer County take the brunt of the bad public relations sure to be created if the multi-use path alignment indicated in the Area Plan remains and a robust evaluation of all alternatives is not undertaken. I would hope that we could work with Placer County to develop a path alignment that is feasible, weighs all relevant factors, and represents the interests of all stake holders. 95-1 cont

I would like to suggest that before this possibly escalates as I will explain below, the County would consider sitting down with us to see if it would be possible to work out a mutually acceptable solution to the connection and completion of the multi-use path. The public at large, along with the merchants, the out-of-town visitors and I'm sure you and I would like to see this project completed in a timely fashion. I'm not sure that a vast majority of the public really care where it goes. They just want to see it completed for their own safety and hopefully in their lifetimes.

By "escalates" above, I am referring to the obvious fact, at least to me, that the 48 residence owners at TML are not going to voluntarily allow the TCPUD or Placer County or whomever to just take their private residential property, their future safety, their further right to undisturbed use and enjoyment of their real property

without some kind of a fight. Condemnation and eminent domain would seem to me to be the only way this land could be commandeered for this purpose. This fight doesn't sound like something either of us would enjoy but more one we would like to avoid. Shouldn't the expeditious completion of the Tahoe Basin Area Plan, the trail connection being a part of it, be the prize we are all looking for?

I could probably go on for six more pages citing a laundry list of safety, privacy, environmental and any number of other concerns we have regarding the preferred alternative alignment but I think you get my point. A meeting between the ultimate decision makers on both sides in an effort to hammer out a compromise needs to take place. I am assuming the decision makers on your side would be the Placer County Supervisors and possibly the elected Directors of the TCPUD. 95-1 cont

In closing I would like to see the lakeside preferred alignment removed from the Area Plan and to have all alternatives fully evaluated. There is way more involved here than can be represented by one blue line on a map. This portion of the Area Plan is deficient because it is not evaluated in the DEIR, ultimately way too expensive due to the Eminent Domain factor, and a total waste of public funds. Significantly more economical and timely alternatives do in fact exist and should be explored further. We are not building an International Airport here - we are trying to connect two ends of a bike trail. How about we have the meeting that should have taken place but up to now has not.

Thanks for your consideration,

Clark G. Sperry

| Letter 95 | Clark Sperry<br>No date |
|---|---|

95-1 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and concern regarding the potential adverse impacts associated with this shared-use path alignment. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

**Letter 96**

August 2, 2016

To whom it may Concern:

My name is Dan Tester. I am a property owner in Agate Bay, a partner in an Olympic Valley based business of 50+ employees and a 26 year resident of the Tahoe Truckee area. I commend Placer County on the completion of the Draft Tahoe Basin Area Plan. I have comments regarding language in the Plan describing the alignment of the Class I shared-use path connecting Commons Beach and Fanny Bridge, otherwise known as the "missing link".

From 2003 to 2009, I served on the North Lake Tahoe Resort Association & Chamber of Commerce Board of Directors. It is gratifying to see the progress of area shared-use trails I advocated for. I am particularly pleased with the lakefront trail connecting Tahoe City Marina to Commons Beach, a truly stunning project benefitting residents and visitors alike. As a resident, tourist serving business owner and heavy user of these paths, I will be equally pleased to see the "missing link" completed.

In the *Active Transportation Facilities* narrative in *Section 5.4 Pedestrian and Bicycle Network* of the Plan, two alternatives for "missing link" path alignment are noted: lakeside and commercial side. Due to the results of an informal poll conducted as part of the Tahoe City Mobility Plan, the lakeside alternative has been dubbed the "preferred alternative" in the Plan for the "missing link". I strongly encourage drafters of this plan to eliminate any of the options as a "preferred alternative" until a detailed analysis of all factors is completed. Listing the lakeside alternative as preferred is a risky precedent, as it implies this as a fait accompli, as is the inclusion of the line indicating the path alignment on Figure 5.5. 96-1

I understand the emotional desire for the lakeside option, but the practical realities of this alignment require thorough review of the other options noted in the Tahoe City Mobility Plan. After recently walking the lakeside alignment, it became clear the lakeside option is not fair to the landowners of Tahoe Marina Lakefront. It crosses over their land, interfering with their quiet and recreational enjoyment of their property. The path would bisect their access to beach and lake activities and cross literally within a couple feet from their patios and living rooms. It's just not right.

In order to ensure a timely, amicable and successful completion of the "missing link" I suggest eliminating any language in the Area Plan that refers to a "preferred alternative" and that the line drawn in Figure 5.5. of the Plan also be removed to avoid any confusion and inconsistency with the EIR . Beyond that, a detailed analysis of all impacts of the various alignment alternatives should be conducted and all critical stakeholders brought to the table as soon as feasible.

Thank you for the opportunity to comment.

Sincerely,

Dan Tester

| Letter 96 | Dan Tester<br>August 2, 2016 |
|---|---|

96-1 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and suggests that additional alternatives be analyzed. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

**Letter 97**

**From:** Karen Wagner <wagnerkarent@gmail.com>
**Sent:** Monday, August 15, 2016 2:40 AM
**To:** Placer County Environmental Coordination Services
**Subject:** Comments on Tahoe City Lodge and Multi-Use Path

To Placer County Coordination Services and Tahoe City Lodge:

My family has been one of the owners of Unit 28 of Tahoe Marina Lakefront since 1974 when it was built (then Tahoe Marina Lodge). I attended the August 12th hearing and would like to raise the following concerns to be addressed in the *Final Environmental Impact Report / Environmental Impact Statement* for the Tahoe City Lodge and Multi-Use Path project.

Concerns about Tahoe City Lodge

The four-story Tahoe City Lodge will have an open-air restaurant on the fourth floor, facing towards our unit. The front of the lodge would directly face our children's first-floor bedroom window (which faces the street). We are concerned about the noise coming from the open-air restaurant at night. Unfortunately, Tahoe City already has some nearby bars/restaurants that sometimes play extremely loud music late at night, such as that heard coming from No. Lake Tahoe Blvd. towards TML and environs until 2:00 a.m. on 8/13/2016 without abatement. To a lesser degree, we are also concerned with increased light from the four-story lodge coming into the children's bedroom. We request for these impacts to be evaluated and addressed with mitigation measures. We would be happy to discuss any ideas with the developer of Tahoe City Lodge, who graciously offered to meet with TML homeowners. 97-1

Concerns about the multi-use path

I respectfully request that the County consider an alternative route for the proposed multi-use path other than routing it through Tahoe Marina Lakefront or through its private property.

The obvious alternative and safer route from Fanny Bridge to Commons Beach is to turn onto Mackinaw and rejoin 28 near the front of TML near the bus stop. In fact, there is a sign at Fanny Bridge with a map showing that exact route as the suggested one.

The proposed multi-use path has severe, adverse impacts on our interests in privacy, safety, security, view, noise, liability, maintenance and environment. The path must be 10 feet wide and that would be impossible at the point near the gate to the dock. The building there is much closer to the end of the grass. In addition to the 10-foot path, there would also need to be built a fence to keep trespassers out of TML private property. The fence would take up space, too. 97-2

It would have a severe impact on privacy, security and views of the TML homeowners to have an unlimited number of pedestrians, bicyclists and perhaps skateboarders, rollerbladers and Razor riders riding past their first-story bedroom sliding-glass windows that are less than ten feet away in some locations. It would also create an unlimited amount of noise and view obstruction. TML homeowners bought their properties to enjoy the view, privacy and quiet. I remember my parents remarking about these attributes when they made the decision to buy. My family counts on having these qualities in our property now and in the future.

We also have environmental concerns. If the large boulders are removed, there is the erosion problem. Putting in asphalt so close to Lake Tahoe would result in runoff with polluting chemicals into the lake.

1

If an elevated walkway is constructed, it increases the maintenance and safety issues and does not alleviate the other impacts. I am very concerned about liability for any injuries to the public and guests while using the path. Is the county assuming responsibility for maintaining the path and obtaining insurance to cover claims and lawsuits by anyone injured on the path? Is the county going to indemnify Tahoe Marina Lakefront for liability for claims and suits arising from public use of the path? We already granted some access to the dock, and some people have gone beyond the allowed use. We don't need that kind of surprise on the multi-use path.

The existing public use path TML was encouraged to accept in the past (from our dock and behind our tennis court) leads to the far lot that we share with the public. It also leads to a relatively new path to Fanny Bridge. If the two paths are connected, pedestrians and bikes will be funneled from the Fanny Bridge area directly to Commons Beach through the TML private property. Today, I saw two groups of people (not TML owners or guests) try to do this before being stopped by our fence. If the far parking lot is used as the link, we would also lose some of the TML parking spots to make room for the multi-use path.

97-2 cont

We would appreciate your consideration of these concerns.

Sincerely,
Karen Torme Wagner

| Letter 97 | Karen Wagner<br>August 15, 2016 |
|---|---|

97-1 The comment expresses concern about the noise coming from the Tahoe City Lodge's open-air restaurant at night. This comment is similar to comment 19-2. See response to comment 19-2 regarding outdoor noise sources related to the Tahoe City Lodge.

97-2 The comment expresses opposition to the lake side alignment of the shared-use path between Commons Beach and Fanny Bridge, and concern regarding the potential adverse impacts associated with this shared-use path alignment. See Master Response 5, Tahoe Marina Lakefront Shared-Use Path Alignment, in Section 3.1 of this Final EIR/EIS.

Letter 98

**From:** Ellie [mailto:tahoellie@yahoo.com]
**Sent:** Tuesday, June 21, 2016 2:39 PM
**To:** "caseybeyer01@yahoo.com"; "lawrence@dcnr.nv.gov"; "shelly@tristatecommercial.com"; "mlberkbigler@charter.net"; "tc@tcarlson.biz"; "lizcarmel@gmail.com"; "tc@thecashmancompanies.com"; "halcole@charter.net"; "nmcdermid@me.com"; "bkcegavske@sos.nv.gov"; "mbrucetrpa@gmail.com"; "bosfive@edcgov.us"; "lpsevison@sbcglobal.net"; "shutetrpa@gmail.com"; "jwytrpa@gmail.com"; "jmarchetta@trpa.org"; "jmarshall@trpa.org"; "mambler@trpa.org"
**Cc:** Jennifer Montgomery; Jennifer Merchant; Crystal Jacobsen; Steve Kastan; Paul Thompson
**Subject:** Please accept as public comment for the record June 22, 2016 TRPA Governing Board Opinion: Placer County needs to slow down its development process

Please accept as public comment for the record June 22, 2016 TRPA Governing Board. Also please have staff answer the clarification question about Chapter 13 code as requested below (highlighted)

Dear Governing Board members:
As stated in my article below and begs the question:

"What's the hurry? To get these projects approved (the three majors projects listed below) have been in the queue with one environmental consultant. The consultant completes their efforts and we get slammed!"

I know that planning the release of documents is not a science and sometimes projects overlap, BUT not to the magnitude of the three larger projects in the queue and many others.

98-1

The TRPA is a party to one of the three documents: The Tahoe Basin Area Plan. I am still trying to complete comprehensive comments on the FEIR for the Martis Valley West Parcel Specific Plan before the tentative July 7 Placer Planning Commission continuation and subsequent July 26 Placer Board of Supervisors.

That said, I must be sure to capture and document enough information to go before the TRPA Advisory Planning Commission on July 13 on the Tahoe Basin Area Plan to insure I have the right to speak before, you, the Governing Board on the project July 22 per TRPA code:

1

Code States there can only be one Lead Agency BUT, this Area Plan has been prepared for TRPA and Placer County.

**How does this EIR/EIS for an Area Plan follow code below? Please clarify who the Lead Agency is.**

## 13.6. CONFORMITY REVIEW PROCEDURES FOR AREA PLANS

### 13.6.1. Initiation of Area Planning Process by Lead Agency

The development of an Area Plan shall be initiated by a designated lead agency. The lead agency may be TRPA or a local, state, federal, or tribal government. There may be only one lead agency for each Area Plan.

### 13.6.2. Initial Approval of Area Plan by Lead Agency

**A. When TRPA is Not the Lead Agency**
If the lead agency is not TRPA, then the Area Plan shall be approved by the lead agency prior to TRPA's review of the Area Plan for conformance with the Regional Plan under this section. In reviewing and approving an Area Plan, the lead agency shall follow its own review procedures for plan amendments. At a minimum, Area Plans shall be prepared in coordination with local residents, stakeholders, public agencies with jurisdictional authority within the proposed Area Plan boundaries, and TRPA staff. 98-2

**B. When TRPA is the Lead Agency**
If the lead agency is TRPA, the Area Plan shall require conformity approval under this section by TRPA only. No approval by any other government, such as a local government, shall be required.

### 13.6.3. Review by Advisory Planning Commission

The TRPA Advisory Planning Commission shall review the proposed Area Plan and make recommendations to the TRPA Governing Board. The commission shall obtain and consider the recommendations and comments of the local government(s) and other responsible public agencies, as applicable.

### 13.6.4. Approval of Area Plan by TRPA

For Area Plans initiated and approved by a lead agency other than TRPA, the Area Plan shall be submitted to and reviewed by the TRPA Governing Board at a public hearing. Public comment shall be limited to issues raised by the public before the Advisory Planning Commission and issues raised by the Governing Board. The TRPA Governing Board shall make a finding that the Area Plan, including all zoning and development Codes that are part of the Area Plan, is consistent with and furthers the goals and policies of the Regional Plan. This finding shall be referred to as a finding of

2

**Draft Environmental Impact Report/ Environmental Impact Statement for the**

**Placer County Tahoe Basin Area Plan and Tahoe City Lodge Project**

**California State Clearinghouse #2014072039**

PREPARED FOR:

**Placer County**
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

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

98-3

No surprise the Planning Commission is on the holiday week (July 7).

First graduation (June 9) day and now a holiday week.

**Ellie Waller**
**Opinion**
http://www.sierrasun.com/news/22576560-113/opinion-placer-county-needs-to-slow-down-it

Back to: News
June 21, 2016

# Opinion: Placer County needs to slow down its development process

98-4

To Placer County:
The citizens of North Lake Tahoe (along with environmental groups in Tahoe and surrounding region and local government agencies) are asking for your support for a fair public process.
We have been besieged with thousands of pages of environmental documentation and have responded in kind. We have asked that Placer slow down the approval process to no avail and give each project its due respect.

3

Final and Draft environmental reports on three major projects that will affect the next 20 years in the Tahoe region have been released within a span 70 days.

The Placer County public process for responding to environmental documents is being abused by releasing several documents of several thousands of pages (EIR document, reference materials, studies, etc. add up to thousands of pages) each for local government agencies, environmental groups, the public-at-large, etc. to respond with comprehensive comments to inform the local elected officials.

I do not require a lot of sleep and can pass up a few meals but it's been hard to get a breath of fresh air trying to read all the documents. There are only 24 hours in a day.

Yes, the County is adhering to minimum requirements for response time but not taking into consideration the volume of information we are required to consume to provide comments.

What's the hurry? To get these projects approved (the three majors projects listed below) have been in the queue with one environmental consultant. The consultant completes their efforts and we get slammed!

The process is not allowing for a sufficient amount of time between each project. They are being overlapped with several meetings each month that we must attend or send in written comments to build an accurate record.
Furthermore, there are many other smaller, but just as important, projects in the pipeline for public comment and meeting attendance (Placer and Nevada County):
1). The Railyard Mixed-Use Development Master Plan in Truckee. 98-4 cont
2). The Crown Motel (Laulima) redevelopment of 4.5 acres on lake and mountain sides of Highway 28 includes 117 lodging rooms, 34 residential units, and 5,500 square feet of commercial space in Kings Beach.
3). The Alpine-Squaw Gondola project: a new 8-person gondola (a design capacity of approximately 1,400 persons per hour in both directions) connecting the Alpine Meadows and Squaw Valley Ski resorts.
4). And on-hold but will be released: The Brockway Campground — a 550-unit luxury camping experience with swimming pool, commercial, etc. atop a Tahoe ridgeline at Brockway Summit abutting the Martis Valley West parcel Specific Plan, just to name a few.
Info on the three major projects can be found below. It's not too late to participate before the projects are approved, but BEWARE it's a time consuming process just to address one project, let alone all three.

Meetings we know of:
July 7: Placer Planning Commission, subject TBD (Squaw or Martis Valley West).
July 13: TRPA Advisory Planning Commission will hear Tahoe Basin Area Plan.
July 26: Placer Board of Supervisors Martis Valley West, tentative.
July 27: TRPA Governing Board and Regional Plan Implementation Committee (two presentations same day) on the Tahoe Basin Area Plan.
July 28: Placer County Planning Commission, Tahoe Basin Area Plan.

4

August 9: Placer County Planning Commission, Squaw, tentative.
August 11: North Tahoe Regional Advisory Council, Tahoe Basin Area Plan
Stay Tuned: Squaw and Martis Valley West will have meetings actually scheduled.

Below are shortened URLs to the environmental reports and more information on the three major aforementioned projects:
Tahoe Basin Area Plan (20+ year up date of community plans and a 120 unit hotel in Tahoe City) released June 15, 2016, Draft Environmental Impact Report: bit.ly/28NfL9T 98-4 cont
Martis Valley West Parcel Specific Plan Final Environmental Impact Report, released May 3, 2016: bit.ly/28R5QPl
Village at Squaw Valley Specific Plan Final Environmental Impact Report, released April 7, 2016: bit.ly/28LywvL

Ellie Waller is a Tahoe Vista resident.

FYI: notified today after article was published
Another Placer Planning Commission meeting has been scheduled: subject TBD on July 14 in Auburn

| Letter 98 | **Ellie Waller**<br>June 21, 2016 |
|---|---|

98-1 The comment expresses dismay regarding the timing of the Area Plan environmental process, considering other projects that are undergoing concurrent environmental review. The comment is noted for consideration.

98-2 The comment includes an excerpt from Section 13.6, "Conformity Review Procedures for Area Plans," of the TRPA Code and inquires as to the lead agency for the Area Plan pursuant to Section 13.6.1. Placer County is the proponent of the Area Plan. Following consideration of approval of the Area Plan by the Placer County Board of Supervisors, TRPA would consider its adoption. As described on page 1-2 of the Draft EIR/EIS, Placer County is the lead agency for the project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.) and TRPA is the lead agency pursuant to the Tahoe Regional Planning Compact (Public Law 96-551, as revised), Code of Ordinances, and Rules of Procedure.

98-3 The comment excerpts a portion of the Title Page of the Draft EIR/EIS and expresses dismay that Planning Commission hearings were scheduled during a holiday week and on the same day as the local high school graduation. The comment is noted for consideration.

98-4 The comment includes an opinion letter authored by the commenter and published in the Sierra Sun on June 21, 2016. The letter reiterates concerns raised in Comment 98-1 about overlapping environmental review schedules for several projects, provides a list of upcoming Placer County and TRPA public hearings, and provides links to environmental documents. The comment is noted for consideration.

TRPA Advisory Planning Commission 7-13-16 July, 10,
Ellie Waller, Tahoe Vista Resident - Comments for The Record
DRAFT Environmental Impact Report / Environmental Impact Statement (EIR/EIS)
Placer County Tahoe Basin Area Plan (TBAP) Clearinghouse # 2014072039

**Letter 99**

The public process has been an empty platitude to those that have participated for 3+ years. There is little to no community/team input translated into the proposed Tahoe Basin Area Plan (TBAP) or meaningful alternative that reflects what the Plan teams (for most sub-areas) requested without holding an alternative hostage to a 118 unit Tahoe City Lodge that requires extraordinary entitlements.

**I was given sage advice to focus on a few topics and not try to conquer the monster.**

That said it's still been an arduous task to find North Tahoe West information enabling a total comprehensive package for that sub-area to be reviewed. Land use Section 5 of Draft DEIR, then need to refer to Land Use Section 4 in Draft Area Plan as the DEIR does not have details by sub-area listed. Next district standards in the Implementing Regulations must be reviewed Table 2.01.A-1 for sub-district and overlay info. Next special policies and designations in the Implementing Regulations in another section. Yet another section: Mixed-Use sub-districts for what is allowed in those districts and required review level be it Allowed or require CUP or MUP, as well as building placement standards and guidelines and to understand for the lay person what a Minor Use Permit or Conditional Use Permit is another Section Chapter 1 of Implementing Ordinances in the Introduction, several maps and diagrams to be consulted in too many places to identify. Plus many more sections and documents.... 99-1

I think you are probably following my arduous task.

I submitted 147 pages in Notice of Preparation (NOP) comments (attached) and many were not addressed, completely ignored and dismissed. I am now requesting all comments and questions within the 147 pages be addressed and answered and corrections made to all related documentation as part of the DRAFT TBAP EIR/EIS process for response to comments in the FEIR. 99-2

I made a reasonable request for each sub-area (North Tahoe East, North Tahoe West, Tahoe City Town City and West Shore) to have a section in its entirety for reviewers to be able to analyze at sub-area level. This request was ignored and not in the DEIR. To add confusion some information is listed as Tahoe Vista or Carnelian Bay. I am requesting the FEIR provide separate sections for what used to be the four (4) separate area plans now sub-areas. It took me several hours to find (if I did find) and am still looking for all references to the North Tahoe West Plan. The information is available just needs to be broken out into sections for each-sub-area to allow the public and agencies the opportunity to provide comprehensive, meaningful comments. 99-3

The Area Plan document for which the DEIR is derived is not consistent with other documents. I cited several inconsistencies in my NOP comments. My NOP comments were ignored. I went to great lengths to point out, by page number, which was and is a time-consuming effort but necessary for clarity and adequacy and accuracy of the environmental documentation. This should trigger and require a re-circulation of the Tahoe Basin Area Plan DEIR/EIS. 99-4

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**Example 1**
G. Upon adoption, the provisions of the Area Plan will supersede the six Community Plans and 51 Plan Area Statements that were previously adopted by Placer County and TRPA for the area. It will also replace two previously adopted Placer County General Plans. Page 2 **Chapter 1 Introduction and General Provisions Draft Implementing Regulations**

I stated in my NOP comments dated July 16, 2015 Page 1 of 48

> In addition to community and general plans, Plan Area Statements (PASs) provide specific land use policies and regulations for individual "Plan Areas." The Placer County portion of the Region is divided into 57 separate Plan Areas. For each Plan Area, a "statement" is made as to how that particular area should be regulated to achieve environmental and land use objectives. Each PAS includes a description, land classification, management strategy, planning considerations, special designations, special policies, use regulations, and density limitations
> Page 3-29 Chapter 3: Land Use, Community Design and Development Potential Existing Conditions Report
>
> G. Upon adoption, the provisions of the Area Plan will supersede the six Community Plans and 51 Plan Area Statements that were previously adopted by Placer County and TRPA for the area. It will also replace two previously adopted Placer County General Plans
> From Implementing Regulations document pgs 1-156 on page 9 of the document Page 2 at bottom of the page
>
> *All reports, studies, documentation, figures, tables, etc. must report data consistently to insure environmental analysis is accurately completed. TRPA website confirms 57 Plan Area Statements in Placer County. The Draft Area Plan EIR/EIS must reflect the correct information as well as being consistently reported in all reference materials and the NOP.*

In addition the Project Description in the Draft EIR/EIS is incorrect in stating 51 PAS which must be corrected in the FEIR for the TBAP. See Plan Area Statement List below for accurate count.

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# 1 INTRODUCTION

## 1.1 PROJECT DESCRIPTION

Placer County and the Tahoe Regional Planning Agency (TRPA) are jointly proposing to adopt the Placer County Tahoe Basin Area Plan (Area Plan), which addresses the portion of Placer County located within the Tahoe Basin, including portions of the north and west shores of Lake Tahoe.

With adoption of the Lake Tahoe Regional Plan in December 2012, TRPA created a new planning instrument, the area plan. Unlike plan area statements (PASs) and community plans, which describe allowable land uses for specific areas in the Tahoe Basin, area plans allow local governments and regulatory agencies to implement the Regional Plan at a smaller scale and with greater flexibility, allowing TRPA to focus on issues of regional environmental significance. Under the new planning system, multiple requirements—TRPA, local, state, and federal are addressed in a coordinated fashion through the Regional Plan and area plans. The result is greater planning and permitting efficiency, while retaining essential oversight by TRPA of large-scale projects and projects in more sensitive Tahoe Basin environments.

The proposed Area Plan was prepared and initiated by Placer County as an update to its 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). The Area Plan would also satisfy California's comprehensive long-term general plan requirements, and would serve as the General Plan for the Tahoe Basin portion of Placer County (California Government Code Section 65300 et seq.). Adoption of the Area Plan would supersede the following general plans, community plans, PASs, and related planning documents adopted to implement the 1987 Regional Plan, and relevant sections of the Placer County Zoning Ordinance:

- West Shore General Plan;
- Tahoe City Area General Plan;
- North Tahoe Area General Plan;
- Tahoe City Community Plan;
- Carnelian Bay Community Plan;
- Tahoe Vista Community Plan;
- Kings Beach Community Plan;
- Kings Beach Industrial Community Plan;
- California North Stateline Community Plan;
- 51 PASs adopted for Placer County;
- Placer County Standards & Guidelines for Signage, Parking and Design; and
- Placer County Zoning Ordinance, Sections 17.02.050(D) and 17.56.202, and Appendices B, C, D, and F.

The proposed Area Plan largely carries forward the details of these existing documents into a single consolidated Area Plan; proposed changes are primarily focused within the TRPA-designated town centers in Tahoe City and Kings Beach. The Draft Area Plan is available for download and review at:

http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan.

The proposed Area Plan contemplates one near-term redevelopment project, the Tahoe City Lodge, and one environmental redevelopment design concept, the Kings Beach Center, both identified as initial opportunities to incentivize and facilitate redevelopment in these areas. The Tahoe City Lodge is proposed by a private developer, Kila Tahoe LLC, and would redevelop an existing commercial complex into a 118-unit lodge with a mix of hotel rooms and 1- and 2-bedroom suites, hotel amenities, and parking. The project

Placer County/TRPA
Placer County Tahoe Basin Area Plan and Tahoe City Lodge Draft EIR/EIS 1-1

99-5 cont

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Plans by Jurisdiction

Placer | Washoe | Douglas

1 001A – Tahoe City CP
2 001B - Tahoe City Industrial
3 002 - Fairway Tract
4 003 - Lower Truckee
5 004 - Burton Creek
6 005 - Rocky Ridge
7 006 - Fish Hatchery
8 007 - Lake Forest Glen
9 008 - Lake Forest
10 009A - Lake Forest Commercial
11 009B - Dollar Hill
12 010- Dollar Point
13 011 - Highlands
14 012 - North Tahoe High School
15 013 - Watson Creek
16 014 - Cedar Flat
17 015 - North Star
18 016A - Carnelian Woods
19 016B - Carnelian Bay Subdivision
20 017 - Carnelian Bay Community Plan
21 018 - Flick Point/Agate Bay
22 019 - Martis Peak
23 020 - Kingswood West
24 021 - Tahoe Estates
25 022 - Tahoe Vista CP
26 023 - Tahoe Vista Subdivision
27 024A - North Tahoe Recreation Area
28 024B - Snow Creek
29 025 - Kingswood East
30 026 - Kings Beach Industrial CP
31 027 - Woodvista
32 028 - Kings Beach Residential
33 029 - Kings Beach CP
34 031 - Brockway
35 032 - California North Stateline CP
36 152 - McKinney Lake
37 154 - Tahoma Residential
38 155 - Tahoma Commercial
39 156 - Chambers Landing
40 157 - Homewood/Tahoe Ski Bowl
41 158 - McKinney Tract
42 159 - Homewood/Commerical
43 160 - Homewood/Residential
44 161 - Tahoe Pines
45 162 - Blackwood
46 163 - Lower Ward Valley
47 164 - Sunnyside/Skyland
48 165 - Timberland
49 166 - Upper Ward Valley
50 167 - Alpine Peaks
51 168 - Talmont
52 169 - Sunnyside
53 170 - Tahoe Park/Pineland
54 171 - Tavern Heights
55 172 - Mark Twain Tract
56 173 - Granlibakken
57 174 - 64 Acre Tract

99-5 cont

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**Example 2**

I stated in my NOP comments dated July 16, 2015 Pages 1/2 of 48

**4.1 Land Use Strategy** **Page 1 Land Use Plan: page 71 on bottom of page**
This Land Use Plan promotes redevelopment of the built environment, multi-modal transportation options and enhanced economic conditions. Regional Plan incentives for compact and environmentally sensitive redevelopment are applied in the Town Centers of Tahoe City, Kings Beach and North Stateline. Incentives to transfer development from sensitive lands and outlying areas to these Centers are also provided.

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Comments for the Record: Placer County Tahoe Basin Area Plan Part 4 Land Use Plan July 16, 2015
Ellie Waller: Member North Tahoe West Team and Tahoe Vista Resident

Additional amendments are implemented for the lower intensity Village Centers throughout the Plan area. In these traditionally commercial nodes, the Plan promotes mixed land uses, environmental gain and high quality design. Village Centers include Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista.

*The Draft Area Plan EIR/EIS must disclose and list the specific amendments for lower intensity Village Centers and provide detailed criteria and environmental analysis for the amendments proposed for each of the Village Centers listed above.* 99-6

Below is what still remains in the Land Section Chapter 4 of the Area Plan. Tahoe Vista is now called a Community Center which adds much confusion. The FEIR should call it a Village Center as previously stated which is more in-line with other Village Centers: Page 71 as previously noted.

## 4.1 Land Use Strategy

This Land Use Plan promotes redevelopment of the built environment, multi-modal transportation options and enhanced economic conditions. Regional Plan incentives for compact and environmentally sensitive redevelopment are applied in the Town Centers of Tahoe City, Kings Beach and North Stateline. Incentives to transfer development from sensitive lands and outlying areas to these Centers are also provided.

Additional amendments are implemented for the lower intensity Village Centers throughout the Plan area. In these traditionally commercial nodes, the Plan promotes mixed land uses, environmental gain and high quality design. Village Centers include Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista.

Another example of Tahoe Vista being cited as a Village Center but in Appendix B you also find Community Center. Community Center must be removed throughout the Area Plan, Draft EIR/EIS, Appendices, Implementing Regulations, etc. to provide clarity and consistenty in FEIR.

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Appendix B Ascent Environmental

**Change i se Tables Associated with Mixed-Use Areas (Town Centers and Village Centers) – Key**

**Village Center Mixed Us o-Districts**

The smaller Village Centers of Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista contain a variety of uses but are not identified in the Regional Plan or eligible for its Town Center incentives. Village Centers face many of the same challenges as the larger Town Centers, including development in SEZs, excess land coverage, scenic non-attainment ratings and a general need for property upgrades.

1. "MUN-" Mixed Use Neighborhood. Includes Dollar Hill (MUN-DH) and Lake Forest Glen (MUN-LFG).
2. "MU-GW" Mixed Use Gateway West
3. "MU-CCW" Mixed Use Community Center
4. "MU-CCE" Mixed Use Community Center East
5. "MU-NC" Mixed-Use Neighborhood Commercial
6. Tahoma Village Center
7. Homewood Village Center
8. Sunnyside Village Center

**Use Category Symbols**

A = allowed use
C = subject to an Administrative Review Permit
S = requires a County Special Use Permit or TRPA special use
CUP = requires a Conditional Use Permit (CUP)
MUP = requires a Minor Use Permit (MUP)
(blank space) = prohibited

Source: *Placer County Tahoe Basin Area Plan Implementing Regulations Public Review Draft.* Placer County. June 2015

99-6 cont

**Example 3**

In the Implementing Regulations Section District Standards Chapter 2 Page 162-166 **TABLE 2.04.C-1: LAND USE REGULATIONS—NORTH TAHOE WEST MIXED-USE SUBDISTRICTS** confuses the reviewers as a header stating Town Center Sub-districts for North Tahoe West which is incorrect.

The table must be corrected for accuracy of the FEIR.

Page 162 for example

**TABLE 2.04.C-1: LAND USE REGULATIONS–NORTH TAHOE WEST MIXED-USE SUBDISTRICTS**

| | *Town Center Subdistricts* | | | | | |
|---|---|---|---|---|---|---|
| *Use* | *MU-GW* | *MU-CCW* | *MU-CCE* | *MU-GE* | *MU-NC* | *Add'l Regs* |
| **Residential** | | | | | | |
| Single Family Dwelling | MUP(2) | MUP(3) | MUP(3) | A(2) | A(1) | |
| Multiple Family Dwellings | MUP(2) | MUP(3) | MUP(3) | MUP(2) | MUP(1) | |
| Multi-Person Dwellings | MUP | MUP | | MUP | | |
| Employee Housing | MUP | MUP | MUP | MUP | MUP | |
| Residential Care | | MUP | | MUP | | |

99-7

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At a recent meeting on another Placer project a member of the Fast Tracks consultant group, to be hired by Placer to help the public navigate the TBAP, asked me where to find info. I suggested she spend several hours with a Placer staff person or Ascent. That speaks volumes to just how difficult the documentation is to navigate.

The Draft Environmental Impact documentation is basically focused on a singular project (The Tahoe City Lodge) which is precedent setting. That said, the environmental documentation assumes all proposed incentives and entitlements will be approved. I will have additional separate comments on the Lodge to insure they are adequately addressed. 99-8

The way in which the documentation is presented to reviewers is confusing. The Tahoe City Lodge project is an independent environmental analysis and should have been an appendix as a separate EIR for ease of commenting and clarity of the documentation, analysis performed and subsequent comments.

An additional alternative, solely based on what is allowed without incentives should be provided in the FEIR as not all incentives may be approved.

**CHAPTER 3 ALTERNATIVES**

Chapter 3 alternative descriptions do not identify or explain areas outside Town Centers in much detail but the DEIR provides in various chapters many anticipated changes even though the documentation has conflicting language that says the area outside town centers will be governed by the old Plan Area Statement information.

Examples:

Identification of Neighborhood Center: Carnelian Bay and Community Center (which should be Village Center) for Tahoe Vista or West Shore Village Center, etc. Implementing Ordinances adequately identifies those areas but the DEIR does not.

This is not a Tahoe City Lodge centric proposal although most of the documentation is focused there. The rest of the area plan that is described in Table 3-6 Alternatives Comparison should be summarized in the alternative descriptions in the FEIR for clarity to the reviewers who may not review the project alternatives charts. 99-9

Alternative 1: Proposed Area Plan and Tahoe City Lodge: This alternative includes the proposed Area Plan as reflected in the June 2015 Public Review Draft and the refinements made in response to stakeholder input in the version released concurrent with this EIR/EIS, and the Tahoe City Lodge as submitted in the project application, with the exception of a more clearly defined project description, including details on the SEZ restoration area and a project scale of 118 lodge units (where 120 were included at the time of submittal) and proposed by the applicant.

Alternative 2: Area Plan with No Substitute Standards and Reduced Scale Lodge: This alternative applies the maximum development standards (e.g., height, density) allowed under the Regional Plan and includes no specific Area Plan programs or substitute standards (e.g., special planning areas, commercial floor area [CFA] to tourist accommodation unit [TAU] conversion, non-contiguous project areas). Alternative 2 includes a modified and reduced-scale Tahoe City Lodge with a reduced number of lodging units.

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Alternative 3: Reduced Intensity Area Plan and Reduced Height Lodge: This alternative would reduce the maximum coverage in town centers allowed under the Regional Plan and implement community-specific height standards with reduced lake side heights. Substitute standards would be implemented requiring higher environmental performance in some cases. The height of the Tahoe City Lodge would be reduced from four to three stories and the building footprint would be expanded to allow the same number of lodging units as the proposed project.

Alternative 4: No Project: This alternative would retain the existing community plans, PASs, and Placer County zoning with no changes; the Area Plan would not be implemented. This alternative does not include redevelopment of the Tahoe City Lodge project site, but reflects a condition in which the project applicant could renovate the existing commercial center to increase occupancy relative to existing conditions. 99-9 cont

I request an Alternative 5 be added for consideration that reflects Area Plan Team member input in its entirety with a Tahoe City Lodge at Reduced height (3 and 4 stories) and max density 56 units, no Tahoe City Town Center Boundary line change and no new special planning areas, and the Tahoe City Golf Course clubhouse be a separate environmental analysis unto itself.

"Tahoe City Town Center Boundary: The Area Plan would modify the Tahoe City Town Center boundary to remove 7.12 acres of property surrounding the Fairway Community Center and the Placer County Tahoe City Wetlands Basin (a water quality wetland treatment area), and add 4.2 acres surrounding the Tahoe City Golf Course clubhouse. These changes would result in a net reduction of 2.91 acres in the town center. The Area Plan would also modify Regional Plan land use designations and zoning within the Tahoe City Town Center to change: (1) the land use designation of land added to the town center from Residential to Mixed Use; (2) the land use designation of the Placer County Tahoe City Wetlands Basin located adjacent to the golf course from Mixed Use to Recreation; and (3) the land use designation of the remainder of the Tahoe City Golf Course from Residential to Recreation. Exhibit 3-3 shows these proposed boundary and land use changes" 99-10

The net reduction allows for more coverage for the TC Golf Course as well as the TC Lodge. The environmental impact of the new clubhouse site and the TC Lodge has far more impacts than the net reduction touted. The FEIR must reflect the impacts versus the reduction if the boundary were to be changed and identify the baseline conditions before the boundary line change, club house relocation and proposed TC Lodge.

The Tahoe City Lodge is being represented as a separate environmental analysis which would have been given 45-60 days as a review period unto itself. 99-11

Add: (1) TC Golf Course clubhouse relocation and new construct (2) substitute standards (3) several special planning areas along with (4) a community plan boundary line adjustment leaving the reviewers to comment on too many components. Clearly identified impact analysis for each of the four items listed above trigger the need for re-circulation. 99-12

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Implementing Regulations Chapter 1 (not to be confused with Chapter 8 Implementation Plan within the Tahoe Basin Area Plan DEIR)

1.02 **Authority**

Pursuant to the TRPA Regional Plan and Code of Ordinances, Chapter 13, Area Plans, the County adopts the regulations in this document to implement the Area Plan in the portions of Placer County located within the Lake Tahoe Regional Planning area.

1.03 **Applicability**

The provisions of this document apply to all land uses, development, and projects occurring within the Placer County Tahoe Basin Area Plan area. The boundaries of the Area Plan include all land within Placer County under the jurisdiction of TRPA.

A. All development within the Tahoe Region is required by federal and State law to comply with the Tahoe Regional Planning Compact (Public Law 96-551), Regional Plan, Code of Ordinances, and other provisions of TRPA.

B. No Area Plan may limit TRPA's responsibility to enforce the Tahoe Regional Planning Compact, Regional Plan, TRPA Code of Ordinances, or other plan or regulation adopted by TRPA.

C. All regulations of the TRPA Code of Ordinances shall remain in effect unless superseded by the provisions of this Area Plan. This document supersedes Chapter 36, Design Standards, of the TRPA Code of Ordinances in the Mixed Use Subdistricts. This document supersedes Chapter 34, Driveway and Parking Standards and Chapter 38, Signs, of the TRPA Code of Ordinances in the entire Plan area.

99-13

**36.2. APPLICABILITY**

**36.2.1. General**

All projects shall comply with the standards set forth in this chapter, except as noted below. In addition, exempt activities, as identified in Chapter 2: *Applicability of the Code of Ordinances*, shall comply with Sections 36.6 (*Building Design Standards*), 36.9 (*Water Conservation Standards*), and 36.10 (*Standards for Combustion Appliances*).

**36.2.2. Substitute Standards**

TRPA may adopt equal or superior substitute design standards pursuant to a community plan, redevelopment plan, specific plan, or master plan. Substitute design standards shall not apply to the review procedures and standards for projects in the shoreland. Appropriate provisions of TRPA's Design Review Guidelines and Scenic Quality Improvement Program may be considered as conditions of project approval. Substitute standards adopted by TRPA are listed below.

**A. Douglas County Substitutions**
The *Douglas County Community Plans, Design Standards and Guidelines*, August 1993, shall apply within the Round Hill Community Plan. The Douglas County South Shore Design Standards and Guidelines (August 2013) shall apply within the South Shore Area Plan.

**B. Placer County Substitutions**
The *Placer County Standards and Guidelines for Signage, Parking, and Design*, February 1993, shall apply to the Tahoe City, Carnelian Bay, Tahoe Vista, Kings Beach Commercial, and Kings Beach Industrial Community Plans.

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TRPA Chapter 36 section 36.2.2 must be amended to add Area Plan(s) before subsitutue standards can be approved. The FEIR/FEIS must add that amendment to approvals.

**REGIONAL PLAN IMPLEMENTATION MEASURES**

The Area Plan includes redevelopment incentives and new development and design standards for mixed-use areas. These provisions are intended to implement Regional Plan policies promoting the redevelopment of existing town centers to improve aesthetic conditions, restore sensitive lands, enhance recreation opportunities, and improve multi-modal transportation options.

- **Maximum Building Height and Density:** The Area Plan designates Core Areas within town centers and Transition Areas along the periphery of town centers. As discussed below, the Area Plan includes additional scenic requirements that may reduce maximum building heights on the lake side of SR 28 or SR 89 (Table 3-2).

**Table 3-2 Area Plan Height and Density Standards**

| | Town Center Core Areas | Town Center Transition Areas | Special Planning Areas | Outside of Town Centers |
|---|---|---|---|---|
| Height | 56 feet and 4 stories | 46 feet and 3 stories | No change unless performance standards are met. If performance standards are met the applicable Core or Transition area standards would apply, or other standards adopted through an Area Plan amendment. | TRPA Code Chapter 37 |
| Tourist Density | 40 units/acre | 40 units/acre | | Same as PAS or CP |
| Residential Density[1] | 25 units/acre | 25 units/acre | | Same as PAS or CP |

[1] Single-family residential is limited to one dwelling unit per acre.

Source: Placer County and TRPA 2015

- **Maximum Transferred Coverage:** Consistent with Regional Plan allowances within town centers, project sites that are greater than 300 feet from Lake Tahoe or on the mountain side of SR 89 or SR 28 could receive transferred coverage to a maximum of 70 percent coverage on high capability lands (land capability districts [LCDs] 4 through 7). Project sites within 300 feet of Lake Tahoe and on the lake side of SR 89 or SR 28 could receive transferred coverage to a maximum of 50 percent coverage on high capability lands.

99-13 cont

Page 3-16 TBAP

There is NO TRPA Regional Plan analysis for height or density (tourist or residential) in what Placer County is calling a Town Center Transition Area. The FEIR must provide analysis of transition areas with further clarification that the lakeside side of the Area Plan in transition areas should not exceed 2 stories and mountainside 3 stories as requested by the North Tahoe West Area Plan team. A portion of the Kings Beach Town Center includes a transition area into Tahoe Vista where this must apply.

TRPA code specifcally states Area of Community Plans outside Centers shall not be eligible for alternative height and density allowances. The undefined in current code of ordinances "transition area" is partially in Tahoe Vista and abuts to the North Tahoe West Plan and should have been part of that sub-district.

99-14

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**CHAPTER 13: AREA PLANS**
13.5 Contents of Area Plans
13.5.3 Development and Community Design Standards for Area Plans

**TABLE 13.5.3-1: MINIMUM DEVELOPMENT STANDARDS FOR AREA PLANS**

| Regional Land Use Districts | Wilderness | Backcountry | Conservation | Recreation | Resort Recreation | Residential | Mixed-Use | Tourist | Town Center Overlay | Regional Center Overlay | High-Density Tourist District Overlay |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Height [3] | N/A | Sec. 37.4 | | | | | | | Up to 4 stories (56 ft) max. [1] | Up to 6 stories (95 ft) max. [1] | Up to 197' max. [2] |
| Density SFD | Sec. 31.3 | | | | | | | | | | |
| Density MFD [3] | N/A | Sec. 31.3 | | | | | | | With adoption of an Area Plan: - Residential: 25 units/acre (max.) - Tourist: 40 units/acre (max.) | | |
| Land Coverage | Sec. 30.4 or Alternative Comprehensive Coverage Management System [See 13.5.3.B.1] | | | | | | | | | | |
| Complete Streets | Sec. 36.5 | | | | | | | | [4] | | |

[1] With adoption of an Area Plan. To ensure compatibility with adjacent uses and viewshed protection, the findings in Sec. 37.7.16 shall apply.
[2] Limited to replacement structures, provided, the structures to be demolished and replaced are an existing casino hotel, with existing structures of at least eight stories, or 85 feet of height as measured from the lowest point of natural grade. Such structures shall also comply with Sec. 37.7.17.
[3] Areas of Community Plans outside of Centers shall not be eligible for the alternative height and density allowances authorized in Area Plans for Centers. Any existing project density approved pursuant to Section 31.4.3 may be retained in an Area Plan.
[4] Plan for sidewalks, trails, and other pedestrian amenities providing safe and convenient non-motorized circulation within Centers, as applicable, and incorporating the Regional Bike and Pedestrian Plan.

99-14 cont

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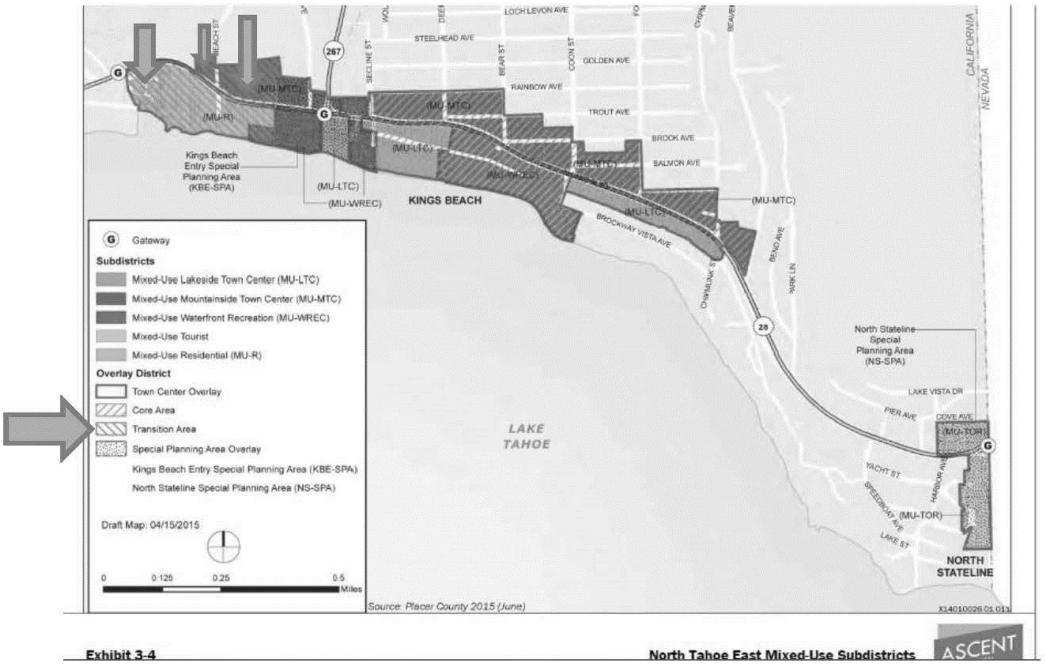


Exhibit 3-4 North Tahoe East Mixed-Use Subdistricts

99-14 cont

The definition below states it's a lower-density sub-district and heights should be consistent with that definition and not at 46 on the lake side as the adjacent North Tahoe West sub-area recommends two (2) stories on the lakeside. Additionally, the tourist density should also be lessened as this area is not the center of the Town Center and abuts to the North Tahoe West sub-area and should reflect the current Plan Area Statements that have been adequately analyzed in the TRPA Regional Plan. Transition Areas were not defined or analyzed in the 2012 Regional Plan Update.

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c. Mixed-Use Residential (MU-R). This subdistrict is intended to allow a variety of residential and nonresidential uses and provides a transition from surrounding, lower-density subdistricts to the Town Center. A mix of residential, tourist accommodation, retail, and recreational uses are allowed; however, nonresidential uses are limited west of Beach Street.

i. **Special Designations.** *(See Section 3.14)*

(1) Town Center

ii. **Special Policies.**

(1) Development is preferred in and directed toward Town Centers.

(2) This subdistrict should be maintained as a residential and tourist area.

99-14 cont

The language on the Placer County web and in the Draft EIR/EIS Introduction section is misleading to the reviewers stating the Tahoe City Golf Course clubhouse is redevelopment of the existing clubhouse when in reality it is proposed to be moved and re-built in its entirety at a different location. The language must be corrected in the FEIR and environmental analysis completed for the new location and building of the TC Golf Course clubhouse before approval of the FEIR/FEIS. The Draft EIR/EIS must be re-circulated as this is new information and analysis.

**Project Description below on the Placer County web:**

**https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/tahoebasinap**

**PROJECT DESCRIPTION:** The proposed Area Plan is a Placer County-initiated update to its land use regulations that apply in the Tahoe Basin. It would update the existing community plans, general plans, plan area statements, maps, and regulations in the Placer County portion of the Tahoe Basin and is being developed to implement the TRPA Regional Plan. Proposed amendments to existing plans, maps, and regulations are primarily focused within the TRPA-designated town centers in Tahoe City and Kings Beach. The proposed Area Plan contemplates one near-term redevelopment project, the Tahoe City Lodge, and one environmental redevelopment design concept, the Kings Beach Center, both identified as opportunities to incentivize and facilitate redevelopment in these areas. The Kings Beach Center design concept is a conceptual mixed-use redevelopment design on parcels owned by Placer County. 99-15

The Tahoe City Lodge would redevelop an existing commercial complex into a 118-unit lodge that would include a mix of hotel rooms and 1- and 2-bedroom suites, hotel amenities, and parking, as well as redevelopment of the existing clubhouse building and new shared-use parking at the Tahoe City Golf Course.

The language above is mis-leading and must be corrected in the TBAP FEIR to reflect that the Tahoe Cty Golf Course clubhouse is being re-located as a new constrcut not simply the redevelopment of the existing clubhouse building. Environmental analysis of the new site location, parking nees assessemnt, etc must be performed.

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Project Description Page 1-1 and 1-2 of Introduction Draft TBAP EIR/EIS

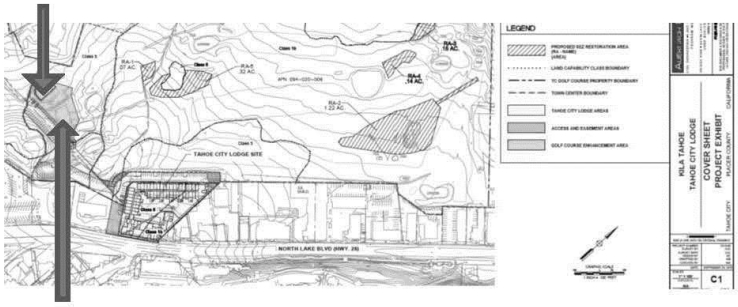
The proposed Area Plan contemplates one near-term redevelopment project, the Tahoe City Lodge, and one environmental redevelopment design concept, the Kings Beach Center, both identified as initial opportunities to incentivize and facilitate redevelopment in these areas. The Tahoe City Lodge is proposed by a private developer, Kila Tahoe LLC, and would redevelop an existing commercial complex into a 118-unit lodge with a mix of hotel rooms and 1- and 2-bedroom suites, hotel amenities, and parking. The project

Placer County/TRPA
Placer County Tahoe Basin Area Plan and Tahoe City Lodge Draft EIR/EIS 1-1

Introduction Ascent Environmental

would also include redevelopment of the existing clubhouse building and new shared-use parking at the Tahoe City Golf Course. The Kings Beach Center is a conceptual mixed-use redevelopment design on parcels owned by Placer County.

NEW clubhouse location




Existing clubhouse location

The reason this article should be part of the public record for this hearing as future hearings on other projects that the public and agencies will be making is being compromised because there just isn't enough time being assessed between the projects released.

Please accept as public comment for the record July 13, 2016 TRPA Advisory Planning Commission hearing on the Tahoe Basin Area Plan.

Opinion: Placer County needs to slow down its development process

http://www.sierrasun.com/news/22576560-113/opinion-placer-county-needs-to-slow-down-its

**Ellie Waller**
**Opinion**

99-15 cont

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Back to: **News**
June 21, 2016

**Opinion: Placer County needs to slow down its development process**

To Placer County:

The citizens of North Lake Tahoe (along with environmental groups in Tahoe and surrounding region and local government agencies) are asking for your support for a fair public process.

We have been besieged with thousands of pages of environmental documentation and have responded in kind. We have asked that Placer slow down the approval process — to no avail — and give each project its due respect.

Final and draft environmental reports on three major projects that will affect the next 20 years in the Tahoe region have been released within a span 70 days.

The Placer County public process for responding to environmental documents is being abused by releasing several documents of several thousands of pages (EIR document, reference materials and studies add up) each for local government agencies, environmental groups and the public at-large to respond with comprehensive comments to inform the local elected officials.

I do not require a lot of sleep and can pass up a few meals but it's been hard to get a breath of fresh air trying to read all the documents. There are only 24 hours in a day.

99-16

Yes, the county is adhering to minimum requirements for response time but not taking into consideration the volume of information we are required to consume to provide comments.

What's the hurry? The three major projects listed below have been in the queue with one environmental consultant. The consultant completes their efforts and we get slammed!

The process is not allowing for a sufficient amount of time between each project. They are being overlapped with several meetings each month that we must attend or send in written comments to build an accurate record.

Furthermore, there are many other smaller, but just as important, projects in the pipeline for public comment and meeting attendance in Placer and Nevada County:

1) The Railyard Mixed-Use Development Master Plan in Truckee;

2) The Crown Motel (Laulima) redevelopment of 4.5 acres on lake and mountain sides of Highway 28 includes 117 lodging rooms, 34 residential units, and 5,500 square feet of commercial space in Kings Beach;

3) The Alpine-Squaw Gondola project: a new 8-person gondola (a design capacity of approximately 1,400 persons per hour in both directions) connecting the Alpine Meadows and Squaw Valley ski resorts;

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4) And on-hold but will be released: The Brockway Campground — a 550-unit luxury camping experience with swimming pool and commercial space atop a Tahoe ridgeline at Brockway Summit abutting the Martis Valley West parcel Specific Plan.

Info on the three major projects can be found below. It's not too late to participate before the projects are approved, but beware — it's a time-consuming process just to address one project, let alone all three.

Meetings we know of:

July 7: Placer Planning Commission, subject TBD (Squaw or Martis Valley West) (Project DENIED)

July 13: TRPA Advisory Planning Commission will hear Tahoe Basin Area Plan

July 26: Placer Board of Supervisors Martis Valley West (tentative) now TBD

July 27: TRPA Governing Board and Regional Plan Implementation Committee (two presentations same day) on the Tahoe Basin Area Plan

July 28: Placer County Planning Commission, Tahoe Basin Area Plan

Aug. 9: Placer County Planning Commission, Squaw (tentative)

Aug. 11: North Tahoe Regional Advisory Council, Tahoe Basin Area Plan

Stay Tuned: Squaw and Martis Valley West will have meetings actually scheduled.

Below are shortened links to the environmental reports and more information on the three major aforementioned projects:

Tahoe Basin Area Plan (20-plus year update of community plans and a 120-unit hotel in Tahoe City) released June 15, Draft Environmental Impact Report: bit.ly/28NfL9T

Martis Valley West Parcel Specific Plan Final Environmental Impact Report, released May 3: bit.ly/28R5QPl

Village at Squaw Valley Specific Plan Final Environmental Impact Report, released April 7: bit.ly/28LywvL

Ellie Waller is a Tahoe Vista resident.

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At the June 9, 2016 Placer Planning Commission meeting an owner (Aaron Rudnick) of the Bechdolt Building spoke during public comment requesting assistance from Placer staff on boundary line issues with the former Hendriksen Building and newly proposed Tahoe City Lodge by Kila Properties. Mr. Rudnick stated that the Tahoe City Lodge is now planning a difference entrance for the Lodge property which utilizes an encroachment for ingress and egress which is the Bechdolt property. Mr. Rudnick also stated this has been an issue for many years and now is the ripe for being officially corrected. A new survey of both properties must be completed and new Lodge proposal drawings done with corrected property boundaries before the TC Lodge can go forward. This is another cause that triggers the necessity to re-circulate the Placer Tahoe Basin Area Plan DEIR/EIS.

The TBAP FEIR must include corrected and approved surveyed boundary lines for Tahoe City Lodge and all properties abutting the project to insure accurate boundary lines are being used.

With all that said and other comments I will believe the Tahoe City Lodge alternative for 56 units is the only alternative that correctly uses the current TRPA ordinances for density. The project site is 1.4 acres which allows 40 units per acre. 1 acre = 40 units + .4 acres = 16 units for a total of 56 units

99-17

**CHAPTER 13: AREA PLANS**
13.5 Contents of Area Plans
13.5.3 Development and Community Design Standards for Area Plans

**TABLE 13.5.3-1: MINIMUM DEVELOPMENT STANDARDS FOR AREA PLANS**

| Regional Land Use Districts | Wilderness | Backcountry | Conservation | Recreation | Resort Recreation | Residential | Mixed-Use | Tourist | Town Center Overlay | Regional Center Overlay | High-Density Tourist District Overlay |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Height [3[ | N/A | Sec. 37.4 | | | | | | | Up to 4 stories (56 ft) max. [1] | Up to 6 stories (95 ft) max. [1] | Up to 197' max. [2] |
| Density SFD | Sec. 31.3 | | | | | | | | | | |
| Density MFD [3] | N/A | Sec. 31.3 | | | | | | | With adoption of an Area Plan: - Residential: 25 units/acre (max.) - Tourist: 40 units/acre (max.) | | |

Range of Alternatives

As described above, the Tahoe City Lodge is proposed in conjunction with the Placer County Tahoe Basin Area Plan, which assumes that the county and TRPA will adopt the Area Plan, thereby providing the incentives upon which the project relies. However, the Tahoe City Lodge could be approved even if the county and TRPA do not adopt the Placer County Tahoe Basin Area Plan. To do so, however, the Tahoe City Lodge would require amendments to the Regional Plan and Code of Ordinances, as well as several planning documents associated with the 1987 Regional Plan. It is anticipated that TRPA would need to amend PAS 002 (Fairway Tract) and the Tahoe City Community Plan to provide the same density

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and height allowances that are provided in the proposed Placer County Tahoe Basin Area Plan. The amendments would be narrowly tailored to the Tahoe City Lodge project site.

The Tahoe City Lodge Project requires the expansion of the TC community plan boundary line adjustment which is not a given and it depends upon utilization of acreage from public linear facility parking and golf course. The clubhouse further confuses the reviewers as it should be a separately analyzed project as it is being relocated and newly built and has not been analyzed in the DEIR. Furthermore, a parking needs assessment must include new clubhouse and uses, lodge parking, golfers, winter uses parking for ice rink, sled hill, etc. to accurately assess if parking is adequate for all uses and a table provided showing the assessment by season and use in the FEIR. 99-18 cont

Appendix D

99-19

| PROJECT AREA CALCULATIONS | Area (SF) | | ALLOWABLE COVERAGE | | TOTAL ALLOWABLE (SF) |
|---|---|---|---|---|---|
| **Tahoe City Lodge** | | | | | |
| **AREA 1 =** | **25,782** | | | | |
| CLASS 1b | 11,509 | x | 1% | = | 115 |
| CLASS 5 | 14,273 | x | 25% | = | 3,568 |
| **Area 2 =** | **35,922** | | | | |
| CLASS 1b | 3,772 | x | 1% | = | 38 |
| CLASS 5 | 32,150 | x | 25% | = | 8,038 |
| **AREA 4 =** | **19,164** | | | | |
| CLASS 1b | 18,197 | x | 1% | = | 182 |
| CLASS 3 | 967 | x | 5% | = | 48 |
| **AREA 5 =** | **787** | | | | |
| CLASS 1b | 37 | x | 1% | = | 0 |
| CLASS 3 | 750 | x | 5% | = | 38 |
| **AREA 7 =** | **49,037** | | | | |
| CLASS 1b | 5,252 | x | 1% | = | 53 |
| CLASS 3 | 27,751 | x | 5% | = | 1,388 |
| CLASS 5 | 16,034 | x | 25% | = | 4,009 |
| **Tahoe City Lodge Area** | **130,692** | | | | **17,475** |
| **Access and Parking** | | | | | |
| **AREA 3 =** | **6,467** | | | | |
| CLASS 3 | 6,467 | x | 5% | = | 323 |
| **AREA 6 =** | **2,705** | | | | |
| CLASS 1b | 2,327 | x | 1% | = | 23 |
| CLASS 3 | 378 | x | 5% | = | 19 |
| **Access and Parking** | **9,172** | | | | **366** |
| **Golf Course Enhancements** | | | | | |
| **AREA 8 =** | **28,611** | | | | |
| CLASS 3 | 183 | x | 5% | = | 9 |
| CLASS 5 | 28,428 | x | 25% | = | 7,107 |
| **Golf Course Enhancements** | **28,611** | | | | **7,116** |
| **Total Area of Project Influence** | **168,475 SF** | | | | |

NOTES:
1. PROJECT AREA AND LAND COVERAGE CALCULATIONS FOR AREAS 1 AND 2 TAKEN FROM TRPA-APPROVED LCV DATED JULY 30,2010
2. PROJECT AREA AND LAND COVERAGE CALCULATIONS FOR AREAS 4,6,7,8,9 TAKEN FROM TRPA-APPROVED LVC DATED APRIL 21, 2010
3. PROJECT AREA AND LAND COVERAGE CALCULATIONS FOR AREA 5 TAKEN FROM OTHER SURVEY INFORMATION. LAND CAPABILITY AND LAND COVERAGE ARE UNVERIFIED.

| EXISTING LAND COVERAGE CALCULATIONS | Tahoe City Lodge Area | | | | | | Access and Parking | | Golf Course Enhancements |
|---|---|---|---|---|---|---|---|---|---|
| | Area 1 | Area 2 | Area 4 | Area 5 | Area 7 | | Area 3 | Area 6 | Area 8 |
| APN | 094-070-002 | 094-070-001 | 094-02-006 | 094-540-003 | 094-540-003 | 094-02-006 | 094-540-004 | 094-02-006 | 094-02-006 |
| **Class 1b** | | | | | | | | | |
| AC (Cart Path, Roads, Parking, Misc.) | 6,728 | 503 | 967 | 37 | 4,278 | | | 1,675 | |
| Buildings/Decks/Stairs/Storage Bins | 2,896 | 2,212 | | | | | | | |
| Concrete (Cart Path, Walls, Misc.) | 1,153 | 910 | | | | | | | |
| Planter | 454 | 34 | | | | | | | |
| Pavers | 33 | | | | | | | | |
| **Class 1b Total** | 11,264 | 3,659 | 967 | 37 | 4,278 | - | - | 1,675 | - |
| **Class 3** | | | | | | | | | |
| AC ( Cart Path, Roads, Parking, Misc.) | | | 12,736 | 513 | 13,758 | | 5,154 | 51 | |
| Cart Bridge/Deck | | | | | 124 | | | | |
| Concrete (Cart Path, Walls, Misc.) | | | | | | | 379 | | |
| AC Walkway | | | 581 | 109 | | | | | |
| Planter | | | | | | | 60 | | |
| **Class 3 Total** | - | - | 13,317 | 622 | 13,882 | - | 5,593 | 51 | - |
| **Class 5** | | | | | | | | | |
| AC ( Cart Path, Roads, Parking, Misc.) | 4,388 | 5,579 | | | 2,875 | 3,504 | | | 8,151 |
| Cart Bridge/Deck Reduction | | | | | 5 | | | | |
| Buildings/Deck/Stairs/Conc. Pads/ BBQ | 8,691 | 8,904 | | | | | | | 3,426 |
| Concrete (Cart Path, Walls) | 1,183 | 9,923 | | | 391 | | | | |
| Dirt/Gravel (Cart Path, Road, Parking, Walkway) | | 1,320 | | | 213 | | | | 168 |
| Bocce Ball Courts (added 4-15-15) | | | | | | | | | 495 |
| Planter | | 439 | | | | | | | 45 |
| **Class 5 Total** | 14,262 | 26,165 | - | - | 3,484 | 3,504 | - | - | 12,285 |
| **Sub-Total Coverage** | 25,526 | 29,824 | 14,284 | 659 | 21,644 | 3,504 | 5,593 | 1,726 | 12,285 |
| **Total Coverage** | **95,441** | | | | | | **7,319** | | **12,285** |

| PROPOSED LAND COVERAGE CALCULATIONS | Tahoe City Lodge Area | | | | | | Access and Parking | | Golf Course Enhancements |
|---|---|---|---|---|---|---|---|---|---|
| | Area 1 | Area 2 | Area 4 | Area 5 | Area 7 | | Area 3 | Area 6 | Area 8 |
| APN | 094-070-002 | 094-070-001 | 094-02-006 | 094-540-003 | 094-540-003 | 094-02-006 | 094-540-004 | 094-02-006 | 094-02-006 |
| **CLASS 1b** | | | | | | | | | |
| BUILDING | 7,036 | 3,140 | | | | | | | |
| CONCRETE | 2,064 | 218 | | | | | | 164 | |
| AC | | | 928 | 37 | 3,234 | | | 1,854 | |
| **Class 1b Total** | 9,100 | 3,358 | 928 | 37 | 3,234 | - | - | 2,018 | - |
| **CLASS 3** | | | | | | | | | |
| BUILDING | | | | | | | | | |
| CONCRETE | | | | | | | | | |
| AC | | | 16,032 | 750 | 14,766 | | 6,157 | 239 | 22 |
| **Class 3 Total** | - | - | 16,032 | 750 | 14,766 | - | 6,157 | 239 | 22 |
| **CLASS 5** | | | | | | | | | |
| BUILDING | 6,586 | 20,225 | | | | | | | 3,737 |
| CONCRETE | 1,937 | 1,654 | | | | | | | |
| AC | 88 | | | | 7,023 | 4,304 | | | 2,295 |
| **Class 5 Total** | 8,611 | 21,879 | - | - | 7,023 | 4,304 | - | - | 6,032 |
| **Sub-Total Coverage** | 17,711 | 25,237 | 16,960 | 787 | 25,023 | 4,304 | 6,157 | 2,257 | 6,054 |
| **Total Coverage** | **90,022** | | | | | | **8,414** | | **6,054** |

REVISED DRAWING

AUBERACH ENGINEERING CORP.

KILA TAHOE
TAHOE CITY LODGE
EXISTING AND PROPOSED COVERAGE CALCS.
PLACER COUNTY CALIFORNIA
TAHOE CITY

C3.3

The reduction in coverage does not take into account the actual science and functionality of the Stream Environment Zone (SEZ) that is being swapped and no environmental analysis has been completed. The Draft TBAP EIR/EIS must be re-circulated to include analysis and proof that there is a net gain of 2.9 acres of **functioning** SEZ. 99-20

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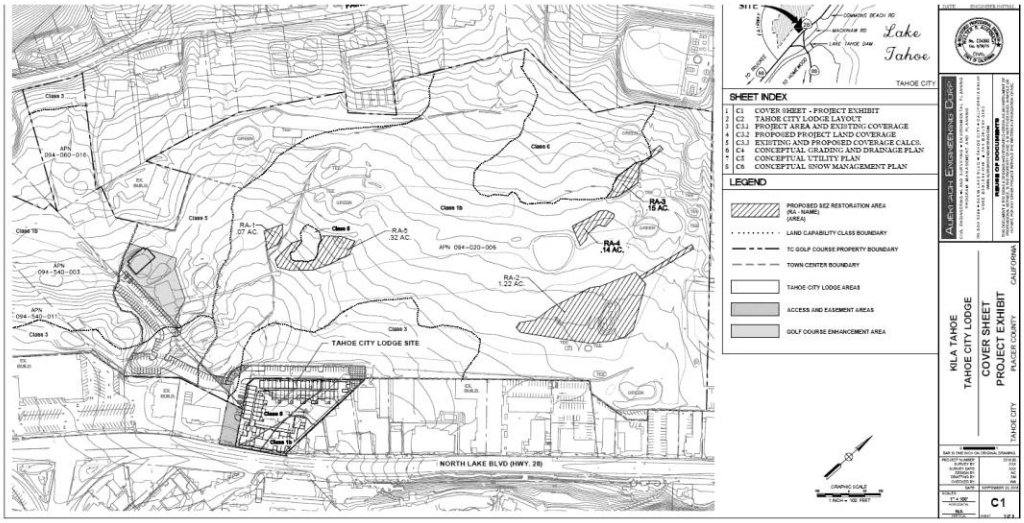


99-20 cont

C1 above shows Access and Easement in tourquoise. The snow storage map below shows using the access and easement. The project must store snow on project site. The FEIR/EIS must define ownership of access and easement and provide new diagrams not using that location for snow storge and that the project site can adequately store snow.

99-21

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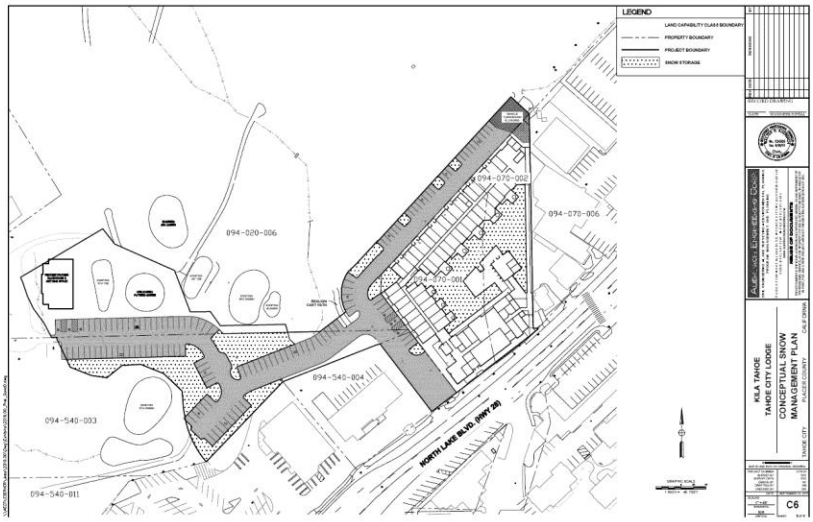


99-21 cont

The Tahoe City Lodge Project requires the expansion of the TC community plan boundary line adjustment which is not a given and it depends upon utilization of acreage from public linear facility parking and golf course. The clubhouse further confuses the reviewers as it should be a separately analyzed project as it is being relocated and newly built and has not been analyzed in the DEIR. 99-22

A land capability challenge was completed which ironically supports changes to stream environment zones in favor of additional coverage for the proposed Tahoe City Lodge and relocation of the Tahoe City Golf Course clubhouse. I attended the TRPA Hearings Officer meeting, on-site meeting at the golf course and expressed my concerns about the land capability challenge results and benefits to the proposed Tahoe City Lodge and Golf Course.

The Hearings Officer, Jim Batege, former Executive Director of TRPA asked the applicant of the land use challenge why the maps I provided of the proposed Tahoe City Lodge (below) were not submitted as part of the review? All information should be provided. The land capability challenge was too conveniently completed prior to the Tahoe City Lodge and Golf Course clubhouse relocation proposals were released in the TBAP. The challenge was very specific to benefit both proposed projects. 99-23

The project is just too large for the proposed area and cannot be built as proposed at 118 units: (1) only allow 56 units, (2) the clubhouse be a separate project and environmental analysis and (3) NO Tahoe City Community Plan boundary adjustment to add proposed golf course clubhouse to Area Plan boundary. The FEIR must include adequate and accurate environmental analysis is performed on the 3 items above and mitigation measures assessed.

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Information below was provided to the TRPA Hearings Officer July 22, 2015 I 99-23 cont

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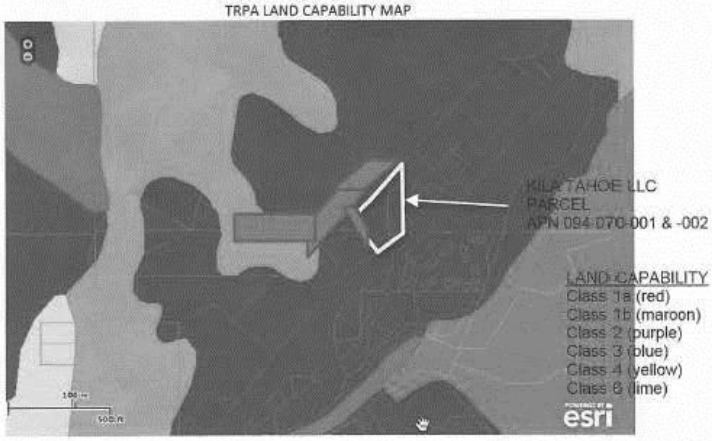
Comment for the Record Tahoe Basin Area Plan NOP Ellie Waller, Tahoe Vista Resident July 22, 2015
Tahoe City Lodge Project and Special Planning Area # 2 ( GB board testimony July 22, 2015)

TRPA LAND CAPABILITY MAP




99-23 cont

Land surrounding the proposed challenge has previously been changed with Tahoe City Golf Course challenge in April 2014 from 1b to Class 3 where proposed shared parking will be located. An approximation of where change was made is demonstrated- refer to actual change on PROPOSED Challenge map.

Other previous changes with the TCGC challenge will result in: 1). TCGC clubhouse being located in Class 5 entirely where it was partially Class 1b. 2) proposed shared golf course/lodge parking location changed from 1B and Class 5 to Class 3..

The TC Lodge project and golf course require detailed analysis and should not be part of the Draft Area Plan EIR/EIS.

The map provided above, with a professional engineered overlay, must be included in the Draft Area Plan EIR/EIS as well as the Tahoe City Lodge Draft EIR/EIS Area Plan to provide clarity for public/agencies comment and insure accurate and extensive environmental analysis.

The independent land capability challenge changes for the golf course and The Tahoe City Lodge project are intertwined but have not been reviewed as a proposed project. The letter of intent between the Lodge and TCGC should also be discussed for clarity.

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Tahoe City Lodge Project and Special Planning Area # 2 ( GB board testimony July 22, 2015)

Allowing 120 units on a 1.4 acre site though calling the site 3.1 acres is confusing and misleading and too many units for less than 1.5 acres where only ½ of the units would be allowed without the additional acreage calculation.

The Tahoe City Lodge site includes 2 parcels as noted in the NOP documentation above and diagram below but will use acreage from off-site shared easement and call it 3.1 acres

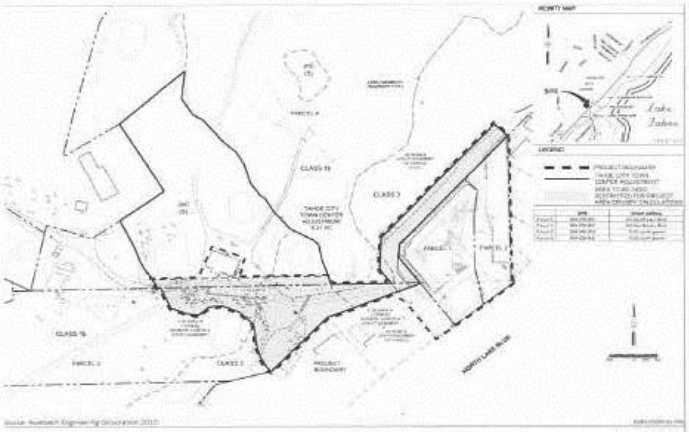

Exhibit 3 Tahoe City Lodge Pilot Project – Project Site Boundaries

99-23 cont

### 1.2.1 Tahoe City Lodge Pilot Project

#### PROJECT LOCATION

The approximately 3.1-acre Tahoe City Lodge Pilot Project site is situated east of the intersection of SR 28 and SR 89 near the western entrance to Tahoe City (Exhibit 1). The site is located at 255 and 265 North Lake Boulevard and includes Assessor Parcel Numbers (APNs) 094-070-001 and 094-070-002, which comprise approximately 1.4 acres. The project site also includes two existing easements on adjacent properties (a 0.5-acre easement from the Tahoe City Golf Course and a 0.1-acre easement from the parcel to the west of the project site) and 1.1 acres of the Tahoe City Golf Course.

#### PROJECT OVERVIEW

The Tahoe City Lodge Pilot Project proposes to redevelop an existing commercial complex into a 120-unit lodge that would include a mix of hotel rooms and 1- and 2-bedroom suites, conference facilities, a lobby, an activity center, a roof-top swimming pool and hot tub, a recreation room (including workout equipment), food and beverage facilities, as well as parking. The project would operate as a "condo hotel" meaning that the 1- and 2-bedroom suites would be sold to private individuals. However, it is anticipated that nearly all of these units would be put into a rental pool and be rented out through the hotel, subject to Transit Occupancy Tax (TOT) like other hotel rooms. The Tahoe City Lodge Pilot Project site boundaries are shown on Exhibit 3, and Exhibit 4 shows the proposed site plan. Lodging unit sizes would range from approximately 300 to 1,000 square feet.

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Tahoe City Lodge Specific comment

Comment for the Record Tahoe Basin Area Plan NOP Ellie Waller, Tahoe Vista Resident July 22, 2015
Tahoe City Lodge Project and Special Planning Area # 2 ( GB board testimony July 22, 2015)

Tahoe City Lodge recent land capability challenge. I attended the Hearings Officer meeting July 9 for a requested change from SEZ 1b to Class 5 for the Lodge location. Staff included information that did not show the recent 2014 challenge info for the adjacent Tahoe City Golf Course which changed 1b to Class 3 bordering this project in April 2014 but instead showed the lands as all 1b surrounding the property. That challenge change will benefit this project and shared golf course and lodge parking.

I presented maps (handed out) to the Hearings Office who stated to staff that they should have been used for the challenge and when the project comes forth, should be the most up to date info. I'm bringing this to your attention as this is a highly unusual process with the proposed Lodge project that has an agreement and requests for easement acreage to allow up to 40 units per acre on approx. 1.4 acres.

The independent land capability challenge changes for the golf course and The Tahoe City Lodge project are intertwined but have not been reviewed as a proposed project and will have to be analyzed as part of the Placer Area Plan environmental documentation but should have been done as one challenge showing the project intent.

The agreement between the Lodge and TCGC should also be discussed for clarity.

I am requesting that the Tahoe City Lodge project come before you as a Board with more detail disclosing what is necessary to get this project on the ground i.e. Area Plan incentives from the Town Centers, The Tahoe City Golf Course Boundary line change to be included as a Community Plan Boundary change as well as a Special Planning Area #2 approval and much more. I believe the complexity of issues will get glossed over/frankly lost with the enormity of the proposed changes in the Placer County Area Plan approval process.

Also note the date of the TCPUD letter of intent to transfer assets is the same time as the TC Golf Course Land Capability Challenge approval.

99-23 cont

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**TCPUD Policy Statement Regarding Transfer of Assets**

TCPUD is willing to negotiate for use or transfer of Tahoe City Golf Course assets and consider entering into public-private partnerships to facilitate redevelopment of the Tahoe City commercial core under the following guidelines and understandings:

- TCPUD holds title to the Tahoe City Golf Course pursuant to the terms of a Memorandum of Understanding with Placer County, North Lake Tahoe Resort Association and the Truckee Tahoe Airport District (Partners). Any negotiation for use or transfer of assets must address the individual Partners' purposes for their financial contribution to the acquisition.
- Any proposal to transfer assets must also preserve a viable golf course and winter sports park, allow for additional public recreation, preserve water rights and not preclude the ability to construct a water treatment plant in the future.
- TCPUD will rely upon the Partners' recommendations for transfer of those assets that are unrelated to TCPUD's purposes.
- The public must benefit from the value of any assets used or transferred.
- Once the Partners' recommendations and goals are met, the buyout provisions in the MOU will be revised or eliminated to reflect the commensurate change in values.
- Any future agreements will be subject to public review and disclosure consistent with the Brown Act.

Approved by the Board of Directors 4/18/2014

References:
http://www.trpa.org/wp-content/uploads/TCPUD-Golf-Course_Staff-Summary_UPDATED1.pdf
Tahoe City Golf Course Land Capability Challenge March 2014 Hearings Officer Mtg

http://www.trpa.org/wp-content/uploads/ITEM-NO.-V.C._KILA-TAHOE_LCC.pdf
Kila Properties Land Capability Challenge Hearings Officer Mtg July 2015

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| Letter 99 | Ellie Waller<br>July 10, 2016 |
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99-1 The comment suggests that little to no community/team input was used to develop the proposed Area Plan and that none of the alternatives reflect what the Plan teams requested. The comment refers to the 118-unit Tahoe City Lodge, implying that additional alternatives without a lodge project or with a smaller lodge project should have been included. Alternative 2 includes a reduced-scale lodge with 56 units, and the no project alternative contemplates no lodge project and no Area Plan. The comment is noted for consideration during project review.

99-2 The comment references comments submitted in response to the Notice of Preparation (NOP) as an attachment to the Draft EIR/EIS comment letter, and requests that the comments and questions contained therein be addressed in the Final EIR/EIS. The State CEQA Guidelines do not require lead agencies to respond in writing to comments on a NOP. All comments received on the NOP are included in the Scoping Summary Report in Appendix A of the Draft EIR/EIS, and were considered in the preparation of the Draft EIR/EIS and development of alternatives evaluated.

99-3 The comment reiterates a request previously submitted in response to the NOP for each sub-area of the Plan area to be addressed separately in the Draft EIR/EIS so reviewers can focus on the analysis of that sub-area, and requests that the Final EIR/EIS provide separate sections for the four sub-areas. The Area Plan Implementing Regulations were prepared to include a separate section related to the North Tahoe West mixed-use subdistricts. Page 11 of the Draft Implementing Regulations lists the five North Tahoe West mixed-use subdistricts and the existing plan area statements (PASs) that would be superseded. Proposed land use regulations, permissible uses, development standards (density, building height, and noise standards), building placement standards and guidelines, parking and access standards and guidelines, and design guidelines are included on pages 162 through 178 of the Draft Implementing Regulations. The request for a different format for the Final EIR/EIS is acknowledged, but the county has determined that the format of the Draft EIR/EIS is sufficient as prepared. The Final EIR/EIS includes the Draft EIR/EIS, excerpted text identifying revisions to the draft document, and responses to comments; its content is not conducive to organization by sub-area.

99-4 The comment suggests that the Area Plan for which the Draft EIR/EIS was prepared is not consistent with other documents, describes that the NOP comments cited several inconsistencies, and asserts that these comments were ignored, and that for these reasons the Draft EIR/EIS requires recirculation. Recirculation is required when significant new information, as defined in CEQA Guidelines Section 15088.5, is added to an EIR after notice of public review but before certification. None of the requirements for recirculation have been triggered and recirculation is not required. See also Response to Comment 99-2 regarding consideration of NOP comments.

99-5 The comment asserts that the correct number of PASs that would be superseded by the Area Plan should be listed as 57 in the Draft EIR/EIS, not 51; the comment also provides a list of the PASs from TRPA's website. Page 1-1 of the Draft EIR/EIS correctly identifies that 51 PASs would be superseded. Six of the items listed in the commenter's attachment are community plans; these include the following: 001A – Tahoe City CP; 017– Carnelian Bay Community Plan; 022 – Tahoe Vista CP; 026 – Kings Beach Industrial CP; 029 – Kings Beach CP; and California North Stateline CP.

99-6 The comment notes confusion related to the Tahoe Vista designations in the Area Plan. As depicted on the Area Plan Land Use Diagram, Figure 4-5, Tahoe Vista is considered a Village

Center, as are other Mixed-Use-designated communities within the Placer County portion of the Tahoe Basin that are not TRPA-designated town centers. As depicted in Chapter 2 of the Area Plan Implementing Regulations, Tahoe Vista also contains zoning districts that are intended to implement the Area Plan Land Use Diagram. The zoning districts are called subdistricts and each individual subdistrict within Tahoe Vista has a different name.

99-7 The comment excerpts Table 2.04.C-1 of the Area Plan and points out an incorrect table heading that refers to town center subdistricts. The comment is correct that the table is labeled in error. The table has been corrected in the revised Area Plan released concurrently with this Final EIR/EIS.

99-8 The comment expresses the opinion that the Draft EIR/EIS is focused on a single project (the Tahoe City Lodge), that the Tahoe City Lodge should have been evaluated in an appendix or separate EIR, and that an additional alternative should be provided that is based on what is allowed without incentives, as all incentives may not be approved. The proposed action includes both the Area Plan and the Tahoe City Lodge project. The impact statements in each of the resource chapters (Chapters 5 through 18) of the Draft EIR/EIS separately identify the impacts of the Area Plan from the Tahoe City Lodge, so it is incorrect to state that the Draft EIR/EIS is focused on a single project. The format of the document is sufficient for the purpose of evaluating the environmental effects of the Area Plan and Tahoe City Lodge. The selection and analysis of alternatives was conducted in accordance with CEQA, State CEQA Guidelines, and TRPA Code and regulations. Evaluation of an additional alternative without incentives is not necessary for disclosure of information pertaining to environmental effects of the project.

99-9 The comment summarizes features of Alternatives 3 and 4 analyzed in the Draft EIR/EIS, and recommends that another action alternative be added for consideration. The suggested alternative would reflect Area Plan Team input in its entirety with a Tahoe City Lodge at a reduced height (3 and 4 stories), a maximum density of 56 units, no town center boundary adjustment, and no new special planning areas. With this alternative, the comment suggests that the golf course clubhouse improvements be evaluated in its own environmental document. All of the attributes recommended in this comment are reflected in Alternative 2 (see Table 3-8 on page 3-37 of the Draft EIR/EIS). As shown in Table 3-8, the lodge height would be 4 stories, the total number of units would be 56, and there would not town center boundary adjustment or new special planning areas. Similarly, there would be no changes to the golf course clubhouse.

99-10 The comment summarizes changes to the Tahoe City Town Center boundary, asserts that the net reduction in the town center acreage allows for more coverage for the Tahoe City Golf Course as well as the Tahoe City Lodge, and suggests that the related impacts would be worse than the benefit of the town center reduction. While it is not entirely clear what the comment is suggesting, presumably the comment is referring to land capability and coverage changes. With respect to land capability the areas removed from the Tahoe City Town Center are SEZ lands (land capability district [LCD 1b]) and the added areas are higher capability lands including LCD 3 and 5 (see Exhibit 14-6 on page 14-20 of the Draft EIR/EIS). Existing (baseline) land coverage information is compared against the various lodge project alternatives in Table 14-8 on page 14-27 of the Draft EIR/EIS. As shown in Table 14-8 and discussed on pages 14-26 through 14-28 of the Draft EIR/EIS, all of the lodge alternatives (Alternatives 1 through 3) would reduce overall coverage relative to existing conditions, and importantly those reductions would also occur in SEZ areas.

99-11 The comment states that the Tahoe City Lodge is being represented as a separate environmental analysis that should have been given 45 to 60 days as a review period by itself. It appears that the comment is suggesting that, if the Area Plan and Tahoe City Lodge had been evaluated in separate environmental documents rather than in one as a hybrid program-project proposal, additional time would have been available to focus on review of

each project element separately. While this may be true, the county and TRPA determined that it was appropriate to evaluate the Area Plan, and a project demonstrating implementation of the Area Plan policies, in one environmental document, allowing 60 days (in accordance with TRPA longer comment period requirements) for public and agency review.

99-12 The comment expresses the opinion that the Tahoe City Golf Course clubhouse relocation and new construction, substitute standards, special planning areas, and a community plan boundary line adjustment leave the reviewers to comment on too many components. The comment implies that each component should be analyzed separately, and that this triggers the need for recirculation. An opinion regarding the complexity of a project under review does not meet the criteria for recirculation as set forth in CEQA Guidelines Section 15088.5. The commenter's opinion is acknowledged. See also response to comment 99-4 regarding CEQA requirements for recirculation.

99-13 The comment excerpts substitute standards discussions from Chapter 1 of the Draft Implementing Regulations and Section 36.2.2 of the TRPA Code, asserts that Chapter 36.2.2 must be amended to add Area Plans before substitute standards can be approved, and suggests that the amendment needs to be added to the approvals in the Final EIR/EIS. Not only is this not a comment on the adequacy of the of the Draft EIR/EIS, but it is also incorrect. Regarding the sequencing of events, substitute standards proposed in the Area Plan and adopted by both Placer County and TRPA become effective as Regional Plan elements pursuant to Chapter 13: Area Plans of the TRPA Code; Section 36.2.2 need not be amended to make the provisions effective.

99-14 The comment asserts that the height and density provisions proposed in the Area Plan Town Center Transition Areas are not allowed by TRPA Code, because those height and density standards are only allowed within town centers. The comment also requests that the proposed Area Plan be revised to include lower height limits. The Draft EIR/EIS describes the proposed Town Center Core and Transition areas on page 3-9 as follows: "Within the Kings Beach and Tahoe City Town Centers, the Area Plan would establish zoning overlay districts for two Community Structure Areas (Exhibits 3-4 and 3-6) that include: Core Areas, in which the full range of Regional Plan incentives would apply; and Transition Areas, which include requirements for transitional building heights (maximum of three stories) and requirements to complete sidewalk or multi-use trail connections to core areas prior to, or concurrent with, projects using the Regional Plan redevelopment incentives." As described in the Draft EIR/EIS and shown in Exhibits 3-4 and 3-6, the proposed Town Center Transition Areas are within the TRPA designated town centers, not outside of them. The Transition Areas would restrict building to lower heights within portions of the town Centers. This provision complies with the TRPA Code requirement that, within town centers, building height and density should be varied with some buildings smaller and less dense than others (TRPA Code Section 13.5.3.F.1.b[iii]). Because the Transition Areas are within town centers, the town center density and height provisions apply to these areas; and the Draft EIR/EIS accurately describes and analyzes these areas. The commenter's request for lower height limits within portions of the town centers is noted for consideration during finalization of the Area Plan.

99-15 The comment expresses the opinion that the Draft EIR/EIS's characterization of the Tahoe City Lodge Golf Course clubhouse as being redeveloped, when it is being moved to a different location, is misleading. The comment proceeds to state that the new location must be analyzed in the Final EIR/EIS, and that the Draft EIR/EIS must be recirculated because this is new information and analysis. The Draft EIR/EIS does not characterize the clubhouse as remaining in its existing location. Rather, text in the project description of the Draft EIR/EIS (page 3-28 and 3-29) describes that the "locations of the reconstructed clubhouse and putting green would be swapped…" Exhibit 3-12 shows the location of the reconstructed

clubhouse, which is what was analyzed in the Draft EIR/EIS. Because the Draft EIR/EIS accurately discloses the potential new location of the clubhouse, recirculation is not required.

The comment also includes a weblink to an opinion letter submitted by the commenter and published in the Sierra Sun. See response to comment 98-4.

99-16 The comment includes the contents of an opinion letter submitted by the commenter and published in the Sierra Sun. See response to comment 98-4.

99-17 The comment raises the boundary line issues between the Bechdolt Building and the former Henriksen Building, now with the proposed Tahoe City Lodge. Please see responses to comment 54-1 and 54-1A regarding this issue. The comment also expresses the opinion that Alternative 2 is the alternative that complies with TRPA density requirements.

99-18 The comment excerpts language included in the last paragraph on page 3-1 of the Draft EIR/EIS describing the mechanism by which the Tahoe City Lodge could be approved absent approval of the Area Plan. The comment identifies specific actions required for implementation of the Tahoe City Lodge. The comment expresses confusion about the Tahoe City Golf Course Clubhouse and suggests it has not been analyzed in the Draft EIR/EIS. Please refer to response to comment 99-15.

The comment also states that a parking needs assessment must include the new clubhouse and uses, the lodge, golfers, and winter uses. A parking needs assessment was conducted for the Tahoe City Lodge project that addresses the uses noted in this comment. Please see Impact 10-8 beginning on page 10-48 of the Draft EIR/EIS and response to comment 12-42.

99-19 This comment excerpts Sheet C3.3 from Appendix D of the Draft EIR/EIS, which details coverage calculations. (See response 99-20, below.)

99-20 This comment states that, in its assessment of coverage, the Draft EIR/EIS does not consider the functionality of the SEZ areas on the Tahoe City Lodge site and the Tahoe City Golf Course. The comment also states that the Draft EIR/EIS must show a net gain of 2.9 acres of functioning SEZ. For a discussion of the Draft EIR/EIS analysis of SEZ impacts see the response to comments 12-54 and 82-2.

99-21 The comment states that the project is required to provide sufficient snow storage within the project area and states that the easement areas may not be used for snow storage. This is partially correct. TRPA Code Section 36.5.3(B) requires that commercial and tourist accommodation uses provide adequate snow storage within the project area, or make arrangements by means of recorded easements or the equivalent to remove and store accumulated snow offsite. The project would be required to demonstrate compliance with this code provision as a condition of approval. See also the Conceptual Snow Management Plan, within Sheet C6 of Appendix A, “Revised Tahoe City Lodge Concept Plans,” of this Final EIR/EIS.

99-22 The comment expresses confusion about the Tahoe City Golf Course Clubhouse. Please see responses to comments 99-15 and 99-18.

99-23 The comment describes concerns with the results of the land capability challenge for the golf course and expresses the opinion that only 56 units should be allowed for the lodge, that separate environmental review should be conducted for the clubhouse, and that the Tahoe City Community Plan boundary adjustment should be denied.

The land capability challenge for the golf course is a separate action from the Area Plan and Tahoe City Lodge project. The land capability challenge was approved by TRPA on February 20, 2014, and was used as the basis for the development of the Tahoe City Lodge project site plans as they relate to the golf course property.

As described in the third full paragraph on page 3-32 and shown in Table 3-8 of the Draft EIR/EIS, Alternative 2 includes a lodge with 56 units and the Area Plan without a town center boundary adjustment as requested by the commenter. See also response to comment 99-15 regarding the clubhouse redevelopment.