FRIENDS OF THE WEST SHORE
• Protecting Our Watersheds • Wildlife • Rural Quality of Life

Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

May 18, 2015

Subject: Comments on S.R. 89/Fanny Bridge Community Revitalization Project Final EIR/S/EA (Project)

Dear Chair Uhler and Members of the Board of Supervisors:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments for your consideration on the proposed Project. However, FOWS is extremely concerned that the Project will cause substantial and unnecessary environmental damage to the area, all while costing taxpayers close to $30,000,000. This is not justified, especially in light of the availability of feasible alternatives (Alt. 6/6a, which widen Fanny Bridge), or a simple rehabilitation ($2 million, according to p. 335 in packet). Further, many impacts, including all factors that affect congestion in the area, have not been properly analyzed or addressed in the FEIR/S/EA. For example:

- Available evidence indicates increasing roadway capacity **increases vehicle trips and VMT**;
  - No evidence supports the assertion that there will not be induced travel/generated trips;
  - **No surveys of existing/future driver behavior** were collected to assess such impacts;
- One of the key causes of congestion at the Wye is not even included in the analysis (pedestrian crossings in Tahoe City).
  - There is no evidence that any action alternative is necessary to improve congestion at the Wye; dealing with pedestrian crossings in Tahoe City may be enough to improve the *temporary* peak congestion the project focuses on;
  - This raises questions regarding how much improvement, if any, will be provided if pedestrian issues in Tahoe City are not addressed;
- The FEIR/S/EA fails to analyze the negative impacts to recreational users of the 64-acre Tract;
  - In fact, **no surveys of recreation users** of the 64-acre Tract were gathered to assess impacts of the new bypass on recreational experience;
- The FEIR fails to analyze all day and nighttime scenic impacts from the elevated bypass;
  - The assessment of daytime impacts sidesteps the impacts of the new **elevated** bypass, providing **no images of existing versus future views on the 64-acre Tract**;
  - Headlight impacts on night sky are not addressed; instead, the FEIR/S/EA fails to consider that roundabouts are circles, and headlights will point in all directions;
- The FEIR/S/EA does not disclose the potential hazardous impacts associated with the movement of the sewer line, nor address concerns of the Tahoe-Truckee Sanitation Agency.

We are also concerned with the rushed process for the environmental document, resulting in the failure to address numerous public comments and concerns. Notably, **72% of the comments submitted by residents and business owners do not support Alternative 1**. Further, concerns among several business owners about the loss of revenue to their businesses from the bypass have not been addressed.

In conclusion, the final EIR/S/EA fails to adequately analyze and disclose numerous impacts, and we therefore recommend you do not approved the Project until these inadequacies have been addressed. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

Cc: Matt Ambroziak, Central Federal Lands Highway Division

Attachments: FOWS' "Fanny Bridge By-the-Numbers" Fact Sheet
4/9/2015 FOWS Comments to TTD
4/7/2015 FOWS Comments to APC
3/9/2015 Additional FOWS comments on DEIR/S/EA & Attachment
2/25/2015 FOWS Comments to TRPA GB
2/17/2015 FOWS Comments on DEIR/S/EA & Attachments

Inadequate Traffic Analysis:

As noted in our comments on the draft EIR/S/EA, there are many inadequacies in the traffic analysis. The Final EIR/S/EA does little to address our concerns, and instead appears to reiterate the draft's conclusions without responding to our detailed comments.

1. The Project's inclusion in the 2012 RTP/SCS was simply based on likelihood of funding, not environmental 'benefits.'[1] There was no analysis of project impacts, or claimed benefits. Therefore, there is no information or analysis from which to 'tier' off of the RTP/SCS EIR. For example, response O5-8 states:

   > "The SR 89/Fanny Bridge Community Revitalization Project was identified in the Regional Transportation Plan (Mobility 2035) as a corridor revitalization project and included in transportation strategy packages A, B, and C. As discussed in Chapter 3, Affected Environment and Environmental Consequences, of the RTP/SCS EIR/EIS most of the impacts in that document address effects from implementation of three Transportation Strategy Packages, which are sets of transportation projects and other transportation actions from the RTP. Therefore, the environmental document for the RTP/SCS did analyze the environmental effects of the project at a programmatic level." (p. 3-189). [Emphasis added]

   A similar statement is made in response to comment O5-13:

   > "The RTP/SCS EIR/EIS is a program-level document that analyzed the environmental effects of the plan, which included the SR 89/Fanny Bridge Project as part of its transportation strategy package. A program EIR provides a regional consideration of cumulative effects and includes broad policy alternatives and program mitigation measures that are equally broad in scope. Thus, this EIR/EIS/EA incorporates by reference cumulative impacts that have been addressed adequately in the RTP/SCS EIR/EIS." (p. 3-192). [Emphasis added].

   However, the responses fail to identify any information in the RTP/SCS EIR that would provide evidence of any environmental analysis, even at a programmatic level. For example, the response could have provided the specific sections and page numbers in the RTP/SCS EIR where the impacts of the Fanny Bridge project were analyzed. Yet no such information has been provided. Therefore, the FEIR/S/EA still fails to analyze the project's cumulative impacts.

2. Any analysis of induced travel and generated traffic from the project is rejected without any supporting evidence. Instead, Master Response 2 continues the same 'narrative and speculation' used in the draft to 'explain away' why the potential for this increased traffic was not analyzed, rather than presenting any evidence that could show whether induced or generated traffic would occur. For example, a driver survey of residents and visitors could be taken during the peak summer and

[1] This is reaffirmed by the response to comment O5-8, which states: "The SR 89/Fanny Bridge project was placed on the "constrained" list instead of the "unconstrained list" because of its funding status." (p. 3-190).

winter months to determine how drivers might react to the increased roadway capacity. This would be as simple as asking questions to determine whether drivers avoid trips during peak hours now, take them off-peak, or don't make trips, and whether this would change if the bypass were constructed. Surveys could also be used to assess which roadways drivers would use, and how the bypass would alter their driving patterns and behaviors.

Instead, the FEIR/S/EA presents readers with a narrative regarding induced travel and highway capacity increases, attempting to explain that it is so complex as to be impossible to evaluate:

> Several comments assert that reducing congestion in the wye area with the SR 89/Fanny Bridge Project would induce motor vehicle trips and cause vehicle miles traveled (VMT) to increase, because of the improved intersection and roadway operation...Economists use the term "induced travel" to describe the additional demand for travel that occurs as a result of a decrease in travel time or the dollar cost of travel. However, this term can also be misinterpreted to imply that an increase in roadway capacity inherently leads to increases in traffic. In fact, the relationship between improvements in highway operations and traffic volume is very complex, involving trip lengths and travel times, availability of alternative routes, capacity around the improved area, travel behavior responses, residential and business development, and changes in regional population and economic growth. Also, much of the concept of induced travel relates to driver behavior. Predicting driver behavior in response to traffic conditions can easily cross into speculation that is not meaningful for environmental review, because motivations for and levels of urgency or flexibility of vehicle trips can vary widely, as can driver decisions to take on or avoid congested traffic conditions. (Master Response 2, p. 3-9).

The EIR/S/EA could have gathered information on the various factors which affect the relationship noted above, especially as the project objectives have been advertised to include a reduction in traffic congestion. Further, such information used in a proper analysis would provide the information necessary for the document to analyze and disclose whether the project increases, or has no impact on, VMT and vehicle trips. However, this analysis was not performed, and the FEIR/S/EA has nothing more than speculation to support the claim that there will be no induced or generated traffic.

Master Response 2 also claims that studies cited in draft comments are not applicable because, "*The potential for significant effects on increased traffic and VMT is focused on congested urban roadways and highways in larger-population metropolitan areas, where the magnitude of traffic shifts can be substantial (Nolan 2001). Many studies of induced travel relate to the development of substantial additional lane-miles on urban highways, where there is an increase in roadway capacity over a substantial distance (Litman 2015).*" (p. 3-10). This provides no additional evidence to support the conclusion that there will be no induced travel. Rather, this response again speculates that because conditions in the Tahoe area are not like those in larger metropolitan areas, the studies don't apply. Once again, information should be gathered locally, from residents and visitors, to evaluate existing and potential driver behaviors.

Master Response 2 also confirms one of our comments[2] – that by reducing congestion during peak times through adding roadway capacity, people will begin to take their trips during those times. As more people switch to making trips during peak hours, the congestion will again increase. This is, in fact, one of the reasons the studies cited in our comments on the draft EIR/S/EA states congestion eventually reaches pre-project levels. This conflicts with the lengthy narratives quoted earlier which appear to discount the possibility that congestion will again increase in the future.

3. TRPA's previous estimates of increased vehicle trips and VMT from the project (730 and 4, 669, resp. [2008]) are explained away with more narrative, but no new evidence. Response O5-12 explains why the 2008 estimates are no longer valid, and why the current estimates claim no new trips or VMT.
    a. The response states: "*The 2012 RTP recognized that demographic and economic changes caused a dramatic shift (i.e., decrease) in current and future traffic volumes, compared to previous projections, in part because of the Great Recession. As a result of the decrease in traffic volumes, modeled VMT by passenger vehicles in the Tahoe Region were shown to have decreased in the 2012 RTP."* This is irrelevant, because the EIR/S/EA must analyze and disclose the potential impacts of the project. Reductions in traffic from the Great Recession are temporary, and should have no impact on the potential future impact analysis. The Great Recession did not reduce roadway capacity, narrow lanes, or cause any other physical changes that would make it impossible for traffic to reach pre-Recession levels.
    b. The response appears to suggest the discrepancy in the 2008 model was a result of the model's inability to account for investments in bicycle, pedestrian, and transit service and facility upgrades.[3] However, the FEIR/S/EA (and the RTP/SCS EIR) provides no evidence to show that these investments in the project area have reduced, or will reduce, 760 trips and 4,669 VMT. In fact, countless comments on the DEIR/S/EA discuss how little the new Transit Center is used. In sum, the environmental analysis fails to explain this discrepancy.

[2] "Once traffic operation is improved by the SR 89/Fanny Bridge Project, travelers who previously shifted a typical peak-period trip to an off-peak time may later take advantage of decreased peak-period travel times through study area. However, the increase in peak-period trips on the improved facility would replace the off-peak trips, because drivers can travel at their preferred, peak-period time again. In this circumstance, total daily traffic and VMT would not increase; traffic volumes would simply shift in time during the day with no added trips." (p. 3-10).

[3] As with most travel demand models, the Tahoe area model is not able to precisely quantify the traffic reductions resulting from specific bicycle, pedestrian, or transit investments (e.g., the model does not reduce automobile traffic and increase bicycle trips with the addition of a new bike path or lane), because these types of improvements were not included in the model structure. It was realized, during the evaluation leading up to the 2012 RPU and RTP/SCS, that the model did not incorporate the non-automobile transportation policies and investments related to mode split across the proposed alternatives. Thus, it was concluded that the Tahoe area model was not built to provide this type of detailed information and the TDM used in the 2008 RTP was over-predicting personal vehicle trips, because it did not account for investments in bicycle, pedestrian, and transit service and facility upgrades. This resulted in an overestimate of VMT. (p. 3-191).

c. The response also suggests that application of the "Trip Reduction Impact Analysis (TRIA) tool yields estimated reductions in vehicle trips," although the response does not provide evidence of how many trips and VMT the TRIA model estimates will be reduced in the project area. Further, as noted in comments on the RPU submitted by traffic expert Joy Dalhgren,[4] there are many problems with the TRIA model.

4. The roadways in the project area are all connected to two-lane highways on each end. As vehicles are forced back into two lanes, (for example, vehicles coming across Fanny Bridge and vehicles traveling on the bypass to drive south on SR 89) there are likely to be bottlenecks in several more locations.

In summary, the FEIR/S/EA lacks evidence to support the claim that traffic trips and VMT will not be reduced as a result of the increased highway capacity, contrary to academic, state, and national information that it will. The FEIR/S/EA gathered no evidence to support various claims regarding driver behaviors, which are acknowledged to affect induced and generated travel, instead relying on lengthy narratives and speculation to assume that there will be no induced trips and VMT. Although the response fails to address another outcome noted in our draft comments – that the reductions in congestion are also temporary because people will begin taking trips during peak hours until levels reach pre-project levels again – the response acknowledges that people will begin traveling more during peak hours (noted above).

Grove Street/Tahoe City Pedestrian Crossing Impacts:

In the public comments submitted on the draft, the pedestrian crossings in Tahoe City were cited as a notable, if not significant cause of the congestion at the Wye, including on S.R. 89 south, in 56 unique comment letters from residents and business owners in the area. Several of these commenters have lived in the area for decades, and are extremely familiar with the traffic conditions during peak summer weekends. As noted in our comments on the draft EIR/S/EA, the document's own transportation appendix also notes the Grove Street pedestrian crossing in Tahoe City as one of the causal factors of the delay at the Wye. Ample evidence suggests that backups on S.R. 89 south of the Wye are affected by delays in Tahoe City. Vehicles heading into Tahoe City are delayed by the uncontrolled pedestrian crossings through town (on S.R. 28), thus causing backups across Fanny Bridge and south on S.R. 89 as vehicles turning left (toward Truckee) are stuck in the line of vehicles because it is a two-lane road. Notably, Master Response 1 includes a full page discussing all of the other factors involved in congestion in this area, including driver behaviors, unfamiliar drivers, mid-block pedestrian crossing activity (in Tahoe City), and traffic congestion on SR 28 east of the wye, which specifically states: "*The mid-block pedestrian crossings near Grove Street further exacerbate these conditions. Lack of capacity on this segment of SR 28 contributes to the long queues on northbound SR 89 in the vicinity of Fanny Bridge and the existing wye intersection."* (p. 3-8).

4 http://www.trpa.org/documents/reisc/2_Other%20Organizations/North%20Tahoe%20Preservation%20Alliance%20&%20Mountain%20Area%20Preservation%20Foundation.pdf (see pages 17-21).

This would suggest that alleviating peak congestion, and improving pedestrian conditions at Fanny Bridge, may be resolved by simply addressing the pedestrian crosswalks in Tahoe City and making minor improvements to Fanny Bridge. In fact, commenters provided several suggestions to 'test' this theory for one year – before causing the environmental damage and tax-payer expense associated with the new bypass and bridge.

Yet the project dismisses this information entirely, instead stating: "*Congestion at the Grove Street/SR28 intersection caused by pedestrians is not within the scope of the project (see Master Response 1, Comments Related to Project Purpose and Need*)" (p. 3-192). However, given the objective of the project includes reducing congestion at the Wye, it makes little sense to exclude from review the potential causes of the congestion.

Input from local residents most familiar with traffic conditions is also dismissed:

> Some comment letters provide observational evidence to support the contention that there is little to no congestion in the area surrounding the wye, both as personal experience and photographs. While personal observations of congestion can be helpful, inherently, congestion does not occur continuously, but rather during heavy traffic and pedestrian use periods, so single observations or photographs or a small number of observation days can overlook heavily congested periods. Also, in a community where seasonal visitor traffic contributes substantially to local traffic volumes, peak traffic patterns and timing are different from average annual conditions. (p. 3-6).

Notably, unlike decades of observations by locals (including public transit drivers, river raft shuttle drivers, and others who would be on the roadway during peak times), the environmental analysis is based on traffic counts and models that "[do] not account for all of the driver-based field behaviors and human factors…" without extensive calibration effort (which was not done). The traffic counts also do not consider the impacts of pedestrian activity in Tahoe City, nor the impacts of that activity on the Wye and south on S.R. 89. In fact, as the Final EIR/S/EA notes in numerous responses, downtown Tahoe City is not within the project area and therefore was not included in the analysis. However, the traffic and pedestrian activity in these areas impact traffic operations throughout the entire area - from east of Tahoe City on SR 28, through the downtown, to the Wye, south on SR 89, and north on SR 89. Looking at just one segment of the entire area without considering how it fits into the larger picture makes little sense. As a result, there is no evidence to support the contention that Fanny Bridge is the primary cause of congestion at the Wye, and thus no evidence to support the claim that a new bypass is needed to address this problem. On the other hand, there is ample information suggesting the need to examine and document the impacts of the pedestrian crossings in Tahoe City on congestion at the Wye – however the FEIR/S/EA fails to do so.

Purpose of Project:

As noted in our comments on the DEIR/S/EA, the proposed bypass is not likely to reduce congestion in the long run, will likely result in increased VMT and vehicle trips, does not address all causes of congestion at the Wye, and there are less intrusive and damaging alternatives available to improve pedestrian safety (e.g. Alt. 6/6A) on Fanny Bridge. Therefore, we raised questions regarding the actual purpose of the project. Based on information in the DEIR/S/EA, the Economic Report for Fanny Bridge, and as referenced

by the Executive Director of the TTD in March (excerpt below), it appears some of the push for the proposed project may be related to potential future developments in Tahoe City (e.g. the Hendrickson "Opportunity" Project), rather than merely correcting existing problems.

> Proposed benefits of the project: Safety; two points of ingress and egress for the West shore, fewer bike and pedestrian conflicts with vehicles, congestion Improvement, complete street implementation; the old alignment becomes a local county street, catalyst for economic development at the North end of Tahoe City, the bike trail along the river, and operational improvements for traffic, transit, and goods movement. (Carl Hasty, APC March 11, 2015) [Emphasis added].

The FEIR/S/EA does not address these comments.

Scenic Impacts:

Elevated bypass and bridge:
The scenic impacts of an elevated new bridge and bypass across the 64-acre Tract have not been examined. We identified this failure in our comments on the draft, however, no new images to assess these impacts were provided in the final. For example, although the draft EIR/S/EA notes key viewpoints and observation points within the 64-acre Tract, there are no visuals to illustrate what the elevated bypass will look like at these viewpoints. The FEIR/S/EA does not address this discrepancy.

The draft and final EIR/S/EA documents also fail to provide ground-level images of what the alternatives will look like compared to existing conditions. Although additional simulations were provided at the 2/26/2015 TTD public workshop, they consisted primarily of images from aerial viewpoints, and therefore do not provide a means for the public to assess the impacts at the level the public will be viewing the new structures from.

The FEIR/S/EA also fails to examine the scenic impacts of the elevated bridge and bypass from locations required by the TRPA scenic thresholds, including bike paths, public areas, surrounding mountains and hiking trails, and Lake Tahoe.

Night sky:
The impacts of the light from vehicle headlights have not been addressed, and the response to these concerns includes more narrative and speculation:

> Light and glare associated with headlights along the realigned portion of SR 89 would not substantially affect sensitive receptors in the study area. As stated on page 4.14-36 of the Draft EIR/EIS/EA, existing light sources on and around the project site includes vehicle lights on SR 89. Headlights along the realigned section of SR 89 would be pointed in the direction of travel (generally east to west or west to east), which would not be toward residential units. While headlights create limited amounts of spillover light, this would be shielded by the presence of trees throughout the project site. Recreation users would not be expected within the 64-Acre Tract after dark for extended times, and would, therefore, experience headlights for a limited period, such as just prior to sundown. (p. 3-21)

Yet there are no diagrams or information to assess the impacts of headlights – which will actually be aimed in *all* directions at the roundabouts (which are *circles*), not the existing N/S or E/W directions of the highway as the response suggests. Night light impacts may affect the residential areas southwest of the project area, given the elevation of the western roundabout and the raised location of neighborhoods in that area. Also, as no surveys have been done to assess recreationists' use, experience, and impacts from the project, there is no information to base the statement that recreation users would not be impacted by lights because they "would not be expected to be within the 64-acre Tract after dark for extended periods of time."

Further, the DEIR/S/EA information regarding this impact notes headlights on SR 89 as an existing light source:

> Existing light sources on and around the project site include lighting at the Caltrans Maintenance Facility, the County buildings on the north side of SR 89, the existing Transit Center on the north end of the 64-Acre Tract and development located to the south and southeast of the 64-Acre Tract, from street lights and parking lot lights in Tahoe City, street lights and signal lights in the wye intersection area, lights at businesses just south of Fanny Bridge, and vehicle lights on SR 89. (DEIR/S/EA, p. 4.14-36). [Emphasis added]

However, the 'analysis' of the impacts of Alternative 1 does not discuss the impacts of headlights.

> Operational Phase
> Under this alternative, new sources of light would include lighting for the bicycle/pedestrian undercrossing of bridge, lighting on the new bridge, street lighting at the two roundabout intersections and lighting at the entrance to the Transit Center onto the newly localized road (relinquished portion of SR 89). Rehabilitation or replacement of Fanny Bridge and modifications to the free-right turn lanes would not result in a substantial change to lighting conditions in the wye area. Modifications to the Caltrans maintenance facility, T-TSA sewer line, and NSEF sewer export main would not result in a substantial change to existing lighting conditions. There are no sensitive receptors for nighttime lighting in the vicinity of the new bridge. The nearest residential area to the eastern roundabout is approximately 350 feet to the southeast and is screened by dense coniferous forest. There are few sensitive receptors to nighttime lighting in this area. Compliance with Caltrans standards for roadway lighting would be part of the project. Thus, because the project lighting would be limited to the new bridge, intersections, and roundabouts, would be located in areas that do not have receptors sensitive to nighttime lighting, and would have to comply with Caltrans standards for roadway lighting, this impact would be less than significant. (DEIR/S/EA, p. 4.14-36).

As a result, the FEIR/S/EA still fails to analyze and disclose the impacts of headlights on night sky, and to adjacent residential areas.

Recreation Impacts:

As noted in our comments on the draft EIR/S/EA, there is no evidence upon which to analyze and disclose the impacts to recreation experience. Notably the following impact was included for analysis in the draft: "Impact 4.13-4: Effects on the quality of recreation use experience." However, no surveys were gathered to assess existing user experiences and to ask users how a bypass through the forested area would impact their experience. Instead, the final, like the draft, reiterates speculation and narrative to 'conclude' that

users already expect urban features nearby, and therefore should not find their experience impacted by the new bypass.

As noted in our comments on the DEIR/S/EA, past recreation surveys indicate that most users of the 64-acre Tract did not drive there – they walked from their homes or lodging units. We raised the question of how many people may choose to drive to another less impacted recreation area for their recreation after the bypass is built, and what the traffic implications of this would be. However, Master Response 3 incorrectly states what our comments were,[5] and in doing so, fails to address the actual question (see p. 42, FOWS 2/17/2015 comments on DEIR/S/EA; excerpt below):

> However, if a new bypass is added, this will bisect the now valued open space and recreation benefits of the 64-acre Tract. As a result, people may opt to visit (drive to) other less developed areas to recreate, thereby creating more vehicle trips…***Further, surveys need to assess whether the 70+% of recreation users who walk to the area from their homes or lodging locations will instead drive to recreate if the bypass is constructed. Such impacts to VMT and vehicle trips must be included in the revised transportation analysis.***

Finally, although the EIR/S/EA claims the recreation experience will be enhanced due to certain trail connections, more access to the 64-acre Tract (although ample access already exists), and reduced conflicts on Fanny Bridge, in failing to assess the impacts on recreation users' experience, the document also fails to assess how the new bypass across the now forested area and the Truckee River, may impact tourism if the experiences associated with hiking, biking, walking, and rafting in the area are negatively impacted.

New Land Coverage:

Alternative 1 will add 23,136 square feet of new coverage in an SEZ (LCD 1b), and 191,664 square feet of new coverage in total. This conflicts with TRPA's SEZ thresholds which require a reduction in coverage on SEZs. However, the FEIR/S/EA claims the impacts are less than significant because TRPA's Code allows exceptions for public facilities, and that a certain amount of unidentified mitigation will occur 'somewhere.' As noted in our comments on the draft EIR/S/EA, the exemption in the Code only applies to situations where no feasible alternative is available. However, as noted by the EIR/S/EA, Alternatives 6 and 6a are "feasible." These alternatives would add 11,761 (Alt. 6a) and 12 197 square feet (Alt. 6) of new coverage in LCD 1b – far less than Alternative 1. In addition, as noted in comments by Jim Sajdak, it appears a modified, narrower version of Alternative 6a could be viable, which may reduce this coverage even more. Further, Alternative 6a (at the existing size) will result in a total reduction in coverage.

Oddly, the response to comments includes a narrative, stating: "*As described in Chapter 2, TRPA, as one of the three Lead Agencies, must approve a preferred alternative that would be considered the most reasonable when environmental, social, economic, and technological factors are assessed."* (p. 3-193). TRPA's primary requirement includes making environmental findings related to the TRPA thresholds. In addition, the response

[5] "Commenters suggested that the action alternatives would reduce traffic congestion to a point that it would encourage existing visitors to travel by car to the 64-Acre Tract, rather than walk or bike, as some currently do." (p. 3-16).

further states: "*Please refer to the TTD and TRPA staff reports for a discussion related to the selection of the preferred alternative*." However, the TTD staff report simply states: *"In preparing the final joint environmental document, the lead agencies convened with other partner agencies to determine the identification and recommendation of a Preferred Alternative."* (p. 5, TTD packet). We did not locate an in-depth discussion related to why the TTD is choosing a more environmentally disruptive and far more costly alternative, nor which "environmental, social, economic, and technological factors" TRPA and partners considered before recommending Alternative 1.

We do not believe the evidence available supports the environmental findings TRPA will be required to make to approve Alternative 1.

Tree Removal:

Alternative 1 will remove 178 trees over 14" dbh. This is dismissed as significant in large part because TRPA exempts EIP projects from tree removal regulations. Further, the bypass will run through an area that was replanted roughly 30 years ago by volunteers in the area who dedicated the planted trees to loves ones. As noted by comments in the record, many people were unaware that these trees would be removed. We request you consider the individual and cumulative impacts of tree removal in the project area, and the concerns of those who planted the trees in past memorials.

Public Input:

To get a sense of how the community felt about the project, FOWS reviewed the comments submitted on the draft EIR/S/EA, and counted the number of individual comments by residents and business owners on the project. These counts excluded repeated comments by the same individual(s), and comments by regulatory agencies, organizations (including FOWS), and public utilities. Many individual commenters expressed: support for Alternatives 5/6/6a, opposition to the bypass (Alternatives 1-4), support for the bypass, or questioned the need for the project. We summed up the comments expressing support for Alternatives 5/6/6a, and /or opposition to the bypass, and determined roughly 72% of the comments (53 out of 74 comments) do not support the bypass. We request the BOS give due consideration to the interests of the community.

Fanny Bridge Bypass "By The Numbers"

72%	% of comments by individual public citizens and business owners that do not support bypass ("Alternatives 1-4")

178 # of trees over 14" dbh to be cut for bypass across 64-acre Tract

730 Additional vehicle trips*

4,669 Additional Vehicle Miles Traveled*

0	# of surveys done to find out if people will drive more with a new bypass

0 # of surveys done to ask how recreationists in 64-acre Tract feel about it being bisected by a highway bypass

0 # of simulated pictures of what bypass will look like across 64-acre Tract

9 ft. Elevation of bypass above ground level & across Truckee River on West Side

$30,000,000 Approx. cost to taxpayers for bypass

** Original TRPA estimate (2008)*

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FOWS supports rehabilitation of Fanny Bridge through a modified (narrower) Alternative 6/6A

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Tahoe Transportation District
PO Box 499
Zephyr Cove, NV 89448

April 9, 2015

Subject: Comments on S.R. 89/Fanny Bridge Community Revitalization Project Final EIR/S/EA

Dear Chair Teshara and Members of the Tahoe Transportation District:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments for your consideration of the Final Environmental Impact Statement/Report/Assessment (FEIR/S/EA) for the State Route 89/Fanny Bridge Community Revitalization Project. We also commend staff for the extensive time involved in addressing the environmental documentation on such a short timeline. However, FOWS is extremely concerned that the preferred alternative – the new bypass and elevated bridge over the Truckee River (Alternative 1) – will cause substantial and unnecessary environmental damage to the area, all while costing taxpayers close to $30,000,000. This is not justified, especially in light of the availability of feasible alternatives (Alt. 6/6a, which widen Fanny Bridge). Further, many impacts, including all factors that affect congestion in the area, have not been properly analyzed or addressed in the FEIR/S/EA. Environmental and community concerns include, but are not limited to:

- Addition of 23,136 square feet of new coverage in an SEZ (LCD 1b), which is contrary to TRPA's threshold and RPU requirements to *reduce* coverage in SEZs;
- Increased vehicle trips and VMT associated with increasing vehicle capacity, contrary to TRPA's thresholds and RPU which call for reduced VMT and automobile use;
- Increased traffic along the West Shore;
- Failure to address one of the key causes of congestion at the Wye (pedestrian crossings in Tahoe City), making it questionable how much improvement, if any, will be provided if pedestrian issues in Tahoe City are not addressed;
- Negative impacts to recreational users of the forested areas of the 64-acre Tract;
- Negative scenic impacts from the elevated bridge and bypass, including day and night impacts;
- Removal of a substantial number of trees, including those planted in memorials; and
- Potential impacts, including sewage spills, associated with the movement of the sewer line.

We are also concerned with the rushed process for the environmental document, resulting in the failure to address numerous public comments and concerns. Although the staff report suggests years of public engagement, it is clear from written and verbal comments in the record that many community members were not aware of the scope of this project. Further, 72% of the comments submitted by residents and business owners do not support Alternative 1. In addition, as noted by entities including Liberty Utilities and the Truckee Water Management Association, owners of property affected by the project were not notified in advance and only learned of the proposed project upon release of the draft EIR/S/EA. Finally, business owners in the area have repeatedly expressed concerns about the loss of revenue to their businesses from the bypass, which have not been addressed in the FEIR/S/EA.

In conclusion, the final EIR/S/EA fails to adequately analyze and disclose numerous impacts, and we therefore recommend you do not certify the document until these inadequacies have been addressed. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

Cc: Matt Ambroziak, Central Federal Lands Highway Division

Inadequate Traffic Analysis:

As noted in our comments on the draft EIR/S/EA, there are many inadequacies in the traffic analysis. The Final EIR/S/EA does little to address our concerns, and instead appears to reiterate the draft's conclusions without responding to our detailed comments.

1. The Project's inclusion in the 2012 RTP/SCS was simply based on likelihood of funding, not environmental 'benefits.'[1] There was no analysis of project impacts, or claimed benefits. Therefore, there is no information or analysis from which to 'tier' off of the RTP/SCS EIR. For example, response O5-8 states:

   > "The SR 89/Fanny Bridge Community Revitalization Project was identified in the Regional Transportation Plan (Mobility 2035) as a corridor revitalization project and included in transportation strategy packages A, B, and C. As discussed in Chapter 3, Affected Environment and Environmental Consequences, of the RTP/SCS EIR/EIS most of the impacts in that document address effects from implementation of three Transportation Strategy Packages, which are sets of transportation projects and other transportation actions from the RTP. Therefore, the environmental document for the RTP/SCS did analyze the environmental effects of the project at a programmatic level." (p. 3-189). [Emphasis added]

   A similar statement is made in response to comment O5-13:

   > "The RTP/SCS EIR/EIS is a program-level document that analyzed the environmental effects of the plan, which included the SR 89/Fanny Bridge Project as part of its transportation strategy package. A program EIR provides a regional consideration of cumulative effects and includes broad policy alternatives and program mitigation measures that are equally broad in scope. Thus, this EIR/EIS/EA incorporates by reference cumulative impacts that have been addressed adequately in the RTP/SCS EIR/EIS." (p. 3-192). [Emphasis added].

   However, the responses fail to identify any information in the RTP/SCS EIR that would provide evidence of any environmental analysis, even at a programmatic level. For example, the response could have provided the specific sections and page numbers in the RTP/SCS EIR where the impacts of the Fanny Bridge project were analyzed. Yet no such information has been provided. Therefore, the FEIR/S/EA still fails to analyze the project's cumulative impacts.

2. Any analysis of induced travel and generated traffic from the project is rejected without any supporting evidence. Instead, Master Response 2 continues the same 'narrative and speculation' used in the draft to 'explain away' why the potential for this increased traffic was not analyzed, rather than presenting any evidence that could show whether induced or generated traffic would occur. For example, a driver survey of residents and visitors could be taken during the peak summer and winter months to determine how drivers might react to the increased roadway capacity. This would be as simple as asking questions to determine whether drivers avoid trips during peak hours now, take them off-peak, or don't make trips, and whether this would change if the bypass were constructed. Surveys could also be used to assess which roadways drivers would use, and how the bypass would alter their driving patterns and behaviors.

[1] This is reaffirmed by the response to comment O5-8, which states: "The SR 89/Fanny Bridge project was placed on the "constrained" list instead of the "unconstrained list" because of its funding status." (p. 3-190).

Instead, the FEIR/S/EA presents readers with a narrative regarding induced travel and highway capacity increases, attempting to explain that it is so complex as to be impossible to evaluate:

> Several comments assert that reducing congestion in the wye area with the SR 89/Fanny Bridge Project would induce motor vehicle trips and cause vehicle miles traveled (VMT) to increase, because of the improved intersection and roadway operation...Economists use the term "induced travel" to describe the additional demand for travel that occurs as a result of a decrease in travel time or the dollar cost of travel. However, this term can also be misinterpreted to imply that an increase in roadway capacity inherently leads to increases in traffic. In fact, the relationship between improvements in highway operations and traffic volume is very complex, involving trip lengths and travel times, availability of alternative routes, capacity around the improved area, travel behavior responses, residential and business development, and changes in regional population and economic growth. Also, much of the concept of induced travel relates to driver behavior. Predicting driver behavior in response to traffic conditions can easily cross into speculation that is not meaningful for environmental review, because motivations for and levels of urgency or flexibility of vehicle trips can vary widely, as can driver decisions to take on or avoid congested traffic conditions. (Master Response 2, p. 3-9).

The EIR/S/EA could have gathered information on the various factors which affect the relationship noted above, especially as the project objectives have been advertised to include a reduction in traffic congestion. Further, such information used in a proper analysis would provide the information necessary for the document to analyze and disclose whether the project increases, or has no impact on, VMT and vehicle trips. However, this analysis was not performed, and the FEIR/S/EA has nothing more than speculation to support the claim that there will be no induced or generated traffic.

Master Response 2 also claims that studies cited in draft comments are not applicable because, "*The potential for significant effects on increased traffic and VMT is focused on congested urban roadways and highways in larger-population metropolitan areas, where the magnitude of traffic shifts can be substantial (Nolan 2001). Many studies of induced travel relate to the development of substantial additional lane-miles on urban highways, where there is an increase in roadway capacity over a substantial distance (Litman 2015).*" (p. 3-10). This provides no additional evidence to support the conclusion that there will be no induced travel. Rather, this response again speculates that because conditions in the Tahoe area are not like those in larger metropolitan areas, the studies don't apply. Once again, information should be gathered locally, from residents and visitors, to evaluate existing and potential driver behaviors.

Master Response 2 also confirms one of our comments[2] – that by reducing congestion during peak times through adding roadway capacity, people will begin

[2] "Once traffic operation is improved by the SR 89/Fanny Bridge Project, travelers who previously shifted a typical peak-period trip to an off-peak time may later take advantage of decreased peak-period travel times through study area. However, the increase in peak-period trips on the improved facility would replace the off-peak trips, because drivers can travel at their preferred, peak-period time again. In this circumstance, total daily traffic and VMT would not increase; traffic volumes would simply shift in time during the day with no added trips." (p. 3-10).

to take their trips during those times. As more people switch to making trips during peak hours, the congestion will again increase. This is, in fact, one of the reasons the studies cited in our comments on the draft EIR/S/EA states congestion eventually reaches pre-project levels. This conflicts with the lengthy narratives quoted earlier which appear to discount the possibility that congestion will again increase in the future.

3. TRPA's previous estimates of increased vehicle trips and VMT from the project (730 and 4, 669, resp. [2008]) are explained away with more narrative, but no new evidence. Response O5-12 explains why the 2008 estimates are no longer valid, and why the current estimates claim no new trips or VMT.
    a. The response states: "*The 2012 RTP recognized that demographic and economic changes caused a dramatic shift (i.e., decrease) in current and future traffic volumes, compared to previous projections, in part because of the Great Recession. As a result of the decrease in traffic volumes, modeled VMT by passenger vehicles in the Tahoe Region were shown to have decreased in the 2012 RTP."* This is irrelevant, because the EIR/S/EA must analyze and disclose the potential impacts of the project. Reductions in traffic from the Great Recession are temporary, and should have no impact on the potential future impact analysis. The Great Recession did not reduce roadway capacity, narrow lanes, or cause any other physical changes that would make it impossible for traffic to reach pre-Recession levels.
    b. The response appears to suggest the discrepancy in the 2008 model was a result of the model's inability to account for investments in bicycle, pedestrian, and transit service and facility upgrades.[3] However, the FEIR/S/EA (and the RTP/SCS EIR) provide no evidence to show that these investments in the project area have reduced, or will reduce, 760 trips and 4,669 VMT. In fact, countless comments on the DEIR/S/EA discuss how little the new Transit Center is used. In sum, the environmental analysis fails to explain this discrepancy.
    c. The response also suggests that application of the "Trip Reduction Impact Analysis (TRIA) tool yields estimated reductions in vehicle trips," although the response does not provide evidence of how many trips and VMT the TRIA model estimates will be reduced in the project area. Further, as noted in comments on the RPU submitted by traffic expert Joy Dalhgren,[4] there are many problems with the TRIA model.

[3] As with most travel demand models, the Tahoe area model is not able to precisely quantify the traffic reductions resulting from specific bicycle, pedestrian, or transit investments (e.g., the model does not reduce automobile traffic and increase bicycle trips with the addition of a new bike path or lane), because these types of improvements were not included in the model structure. It was realized, during the evaluation leading up to the 2012 RPU and RTP/SCS, that the model did not incorporate the non-automobile transportation policies and investments related to mode split across the proposed alternatives. Thus, it was concluded that the Tahoe area model was not built to provide this type of detailed information and the TDM used in the 2008 RTP was over-predicting personal vehicle trips, because it did not account for investments in bicycle, pedestrian, and transit service and facility upgrades. This resulted in an overestimate of VMT. (p. 3-191).

[4] http://www.trpa.org/documents/reisc/2_Other%20Organizations/North%20Tahoe%20Preservation%20Alliance%20&%20Mountain%20Area%20Preservation%20Foundation.pdf (see pages 17-21).

4. The roadways in the project area are all connected to two-lane highways on each end. As vehicles are forced back into two lanes, (for example, vehicles coming across Fanny Bridge and vehicles traveling on the bypass to drive south on SR 89) there are likely to be bottlenecks in several more locations.

In summary, the FEIR/S/EA lacks evidence to support the claim that traffic trips and VMT will not be reduced as a result of the increased highway capacity, contrary to academic, state, and national information that it will. The FEIR/S/EA gathered no evidence to support various claims regarding driver behaviors, which are acknowledged to affect induced and generated travel, instead relying on lengthy narratives and speculation to assume that there will be no induced trips and VMT. Although the response fails to address another outcome noted in our draft comments – that the reductions in congestion are also temporary because people will begin taking trips during peak hours until levels reach pre-project levels again – the response acknowledges that people will begin traveling more during peak hours (noted above).

Grove Street/Tahoe City Pedestrian Crossing Impacts:

In the public comments submitted on the draft, the pedestrian crossings in Tahoe City were cited as a notable, if not significant cause of the congestion at the Wye, including on S.R. 89 south, in 56 unique comment letters from residents and business owners in the area. Several of these commenters have lived in the area for decades, and are extremely familiar with the traffic conditions during peak summer weekends. As noted in our comments on the draft EIR/S/EA, the document's own transportation appendix also notes the Grove Street pedestrian crossing in Tahoe City as one of the causal factors of the delay at the Wye. Ample evidence suggests that backups on S.R. 89 south of the Wye are affected by delays in Tahoe City. Vehicles heading into Tahoe City are delayed by the uncontrolled pedestrian crossings through town (on S.R. 28), thus causing backups across Fanny Bridge and south on S.R. 89 as vehicles turning left (toward Truckee) are stuck in the line of vehicles because it is a two-lane road. Notably, Master Response 1 includes a full page discussing all of the other factors involved in congestion in this area, including driver behaviors, unfamiliar drivers, mid-block pedestrian crossing activity (in Tahoe City), and traffic congestion on SR 28 east of the wye, which specifically states: "*The mid-block pedestrian crossings near Grove Street further exacerbate these conditions. Lack of capacity on this segment of SR 28 contributes to the long queues on northbound SR 89 in the vicinity of Fanny Bridge and the existing wye intersection."* (p. 3-8).

This would suggest that alleviating peak congestion, and improving pedestrian conditions at Fanny Bridge, may be resolved by simply addressing the pedestrian crosswalks in Tahoe City and making minor improvements to Fanny Bridge. In fact, commenters provided several suggestions to 'test' this theory for one year – before causing the environmental damage and tax-payer expense associated with the new bypass and bridge.

Yet the project dismisses this information entirely, instead stating: "*Congestion at the Grove Street/SR28 intersection caused by pedestrians is not within the scope of the project (see Master Response 1, Comments Related to Project Purpose and Need*)" (p. 3-

192). However, given the objective of the project includes reducing congestion at the Wye, it makes little sense to exclude from review the potential causes of the congestion.

Input from local residents most familiar with traffic conditions is also dismissed:

> Some comment letters provide observational evidence to support the contention that there is little to no congestion in the area surrounding the wye, both as personal experience and photographs. While personal observations of congestion can be helpful, inherently, congestion does not occur continuously, but rather during heavy traffic and pedestrian use periods, so single observations or photographs or a small number of observation days can overlook heavily congested periods. Also, in a community where seasonal visitor traffic contributes substantially to local traffic volumes, peak traffic patterns and timing are different from average annual conditions. (p. 3-6).

Notably, unlike decades of observations by locals (including public transit drivers, river raft shuttle drivers, and others who would be on the roadway during peak times), the environmental analysis is based on traffic counts and models that "[do] not account for all of the driver-based field behaviors and human factors…" without extensive calibration effort (which was not done). The traffic counts also do not consider the impacts of pedestrian activity in Tahoe City, nor the impacts of that activity on the Wye and south on S.R. 89. In fact, as the Final EIR/S/EA notes in numerous responses, downtown Tahoe City is not within the project area and therefore was not included in the analysis. However, the traffic and pedestrian activity in these areas impact traffic operations throughout the entire area - from east of Tahoe City on SR 28, through the downtown, to the Wye, south on SR 89, and north on SR 89. Looking at just one segment of the entire area without considering how it fits into the larger picture makes little sense. As a result, there is no evidence to support the contention that Fanny Bridge is the primary cause of congestion at the Wye, and thus no evidence to support the claim that a new bypass is needed to address this problem. On the other hand, there is ample information suggesting the need to examine and document the impacts of the pedestrian crossings in Tahoe City on congestion at the Wye – however the FEIR/S/EA fails to do so.

Purpose of Project:

As noted in our comments on the DEIR/S/EA, the proposed bypass is not likely to reduce congestion in the long run, will likely result in increased VMT and vehicle trips, does not address all causes of congestion at the Wye, and there are less intrusive and damaging alternatives available to improve pedestrian safety (e.g. Alt. 6/6A) on Fanny Bridge. Therefore, we raised questions regarding the actual purpose of the project. Based on information in the DEIR/S/EA, the Economic Report for Fanny Bridge, and as referenced by the Executive Director of the TTD last month (excerpt below), it appears some of the push for the proposed project may be related to potential future developments in Tahoe City (e.g. the Hendrickson "Opportunity" Project), rather than merely correcting existing problems.

> Proposed benefits of the project: Safety; two points of ingress and egress for the West shore, fewer bike and pedestrian conflicts with vehicles, congestion Improvement, complete street implementation; the old alignment becomes a local county street, catalyst for economic development at the North end of Tahoe City, the bike trail along the river, and operational improvements for traffic, transit, and goods movement. (Carl Hasty, APC March 11, 2015) [Emphasis added].

The FEIR/S/EA does not address these comments.

Scenic Impacts:

Elevated bypass and bridge:
The scenic impacts of an elevated new bridge and bypass across the 64-acre Tract have not been examined. We identified this failure in our comments on the draft, however, no new images to assess these impacts were provided in the final. For example, although the draft EIR/S/EA notes key viewpoints and observation points within the 64-acre Tract, there are no visuals to illustrate what the elevated bypass will look like at these viewpoints. The FEIR/S/EA does not address this discrepancy.

The draft and final EIR/S/EA documents also fail to provide ground-level images of what the alternatives will look like compared to existing conditions. Although additional simulations were provided at the 2/26/2015 TTD public workshop, they consisted primarily of images from aerial viewpoints, and therefore do not provide a means for the public to assess the impacts at the level the public will be viewing the new structures from.

The FEIR/S/EA also fails to examine the scenic impacts of the elevated bridge and bypass from locations required by the TRPA scenic thresholds, including bike paths, public areas, surrounding mountains and hiking trails, and Lake Tahoe.

Night sky:
The impacts of the light from vehicle headlights have not been addressed, and the response to these concerns includes more narrative and speculation:

> Light and glare associated with headlights along the realigned portion of SR 89 would not substantially affect sensitive receptors in the study area. As stated on page 4.14-36 of the Draft EIR/EIS/EA, existing light sources on and around the project site includes vehicle lights on SR 89. Headlights along the realigned section of SR 89 would be pointed in the direction of travel (generally east to west or west to east), which would not be toward residential units. While headlights create limited amounts of spillover light, this would be shielded by the presence of trees throughout the project site. Recreation users would not be expected within the 64-Acre Tract after dark for extended times, and would, therefore, experience headlights for a limited period, such as just prior to sundown. (p. 3-21)

Yet there are no diagrams or information to assess the impacts of headlights – which will actually be aimed in *all* directions at the roundabouts (which are *circles*), not the existing N/S or E/W directions of the highway as the response suggests. Night light impacts may affect the residential areas southwest of the project area, given the elevation of the western roundabout and the raised location of neighborhoods in that area. Also, as no surveys have been done to assess recreationists' use, experience, and impacts from the

project, there is no information to base the statement that recreation users would not be impacted by lights because they "would not be expected to be within the 64-acre Tract after dark for extended periods of time."

Further, the DEIR/S/EA information regarding this impact notes headlights on SR 89 as an existing light source:

> Existing light sources on and around the project site include lighting at the Caltrans Maintenance Facility, the County buildings on the north side of SR 89, the existing Transit Center on the north end of the 64-Acre Tract and development located to the south and southeast of the 64-Acre Tract, from street lights and parking lot lights in Tahoe City, street lights and signal lights in the wye intersection area, lights at businesses just south of Fanny Bridge, and vehicle lights on SR 89. (DEIR/S/EA, p. 4.14-36). [Emphasis added]

However, the 'analysis' of the impacts of Alternative 1 does not discuss the impacts of headlights.

> Operational Phase
> Under this alternative, new sources of light would include lighting for the bicycle/pedestrian undercrossing of bridge, lighting on the new bridge, street lighting at the two roundabout intersections and lighting at the entrance to the Transit Center onto the newly localized road (relinquished portion of SR 89). Rehabilitation or replacement of Fanny Bridge and modifications to the free-right turn lanes would not result in a substantial change to lighting conditions in the wye area. Modifications to the Caltrans maintenance facility, T-TSA sewer line, and NSEF sewer export main would not result in a substantial change to existing lighting conditions. There are no sensitive receptors for nighttime lighting in the vicinity of the new bridge. The nearest residential area to the eastern roundabout is approximately 350 feet to the southeast and is screened by dense coniferous forest. There are few sensitive receptors to nighttime lighting in this area. Compliance with Caltrans standards for roadway lighting would be part of the project. Thus, because the project lighting would be limited to the new bridge, intersections, and roundabouts, would be located in areas that do not have receptors sensitive to nighttime lighting, and would have to comply with Caltrans standards for roadway lighting, this impact would be less than significant. (DEIR/S/EA, p. 4.14-36).

As a result, the FEIR/S/EA still fails to analyze and disclose the impacts of headlights on night sky, and to adjacent residential areas.

Recreation Impacts:

As noted in our comments on the draft EIR/S/EA, there is no evidence upon which to analyze and disclose the impacts to recreation experience. Notably the following impact was included for analysis in the draft: "Impact 4.13-4: Effects on the quality of recreation use experience." However, no surveys were gathered to assess existing user experiences and to ask users how a bypass through the forested area would impact their experience. Instead, the final, like the draft, reiterates speculation and narrative to 'conclude' that users already expect urban features nearby, and therefore should not find their experience impacted by the new bypass.

As noted in our comments on the DEIR/S/EA, past recreation surveys indicate that most users of the 64-acre Tract did not drive there – they walked from their homes or lodging units. We raised the question of how many people may choose to drive to another less

impacted recreation area for their recreation after the bypass is built, and what the traffic implications of this would be. However, Master Response 3 incorrectly states what our comments were,[5] and in doing so, fails to address the actual question (see p. 42, FOWS 2/17/2015 comments on DEIR/S/EA; excerpt below):

> However, if a new bypass is added, this will bisect the now valued open space and recreation benefits of the 64-acre Tract. As a result, people may opt to visit (drive to) other less developed areas to recreate, thereby creating more vehicle trips…***Further, surveys need to assess whether the 70+% of recreation users who walk to the area from their homes or lodging locations will instead drive to recreate if the bypass is constructed. Such impacts to VMT and vehicle trips must be included in the revised transportation analysis.***

Finally, although the EIR/S/EA claims the recreation experience will be enhanced due to certain trail connections, more access to the 64-acre Tract (although ample access already exists), and reduced conflicts on Fanny Bridge, in failing to assess the impacts on recreation users' experience, the document also fails to assess how the new bypass across the now forested area and the Truckee River, may impact tourism if the experiences associated with hiking, biking, walking, and rafting in the area are negatively impacted.

New Land Coverage:

Alternative 1 will add 23,136 square feet of new coverage in an SEZ (LCD 1b), and 191,664 square feet of new coverage in total. This conflicts with TRPA's SEZ thresholds which require a reduction in coverage on SEZs. However, the FEIR/S/EA claims the impacts are less than significant because TRPA's Code allows exceptions for public facilities, and that a certain amount of unidentified mitigation will occur 'somewhere.' As noted in our comments on the draft EIR/S/EA, the exemption in the Code only applies to situations where no feasible alternative is available. However, as noted by the EIR/S/EA, Alternatives 6 and 6a are "feasible." These alternatives would add 11,761 (Alt. 6a) and 12 197 square feet (Alt. 6) of new coverage in LCD 1b – far less than Alternative 1. In addition, as noted in comments by Jim Sajdak, it appears a modified, narrower version of Alternative 6a could be viable, which may reduce this coverage even more. Further, Alternative 6a (at the existing size) will result in a total reduction in coverage.

Oddly, the response to comments includes a narrative, stating: "*As described in Chapter 2, TRPA, as one of the three Lead Agencies, must approve a preferred alternative that would be considered the most reasonable when environmental, social, economic, and technological factors are assessed."* (p. 3-193). TRPA's primary requirement includes making environmental findings related to the TRPA thresholds. In addition, the response further states: "*Please refer to the TTD and TRPA staff reports for a discussion related to the selection of the preferred alternative*." However, the TTD staff report simply states: *"In preparing the final joint environmental document, the lead agencies convened with other partner agencies to determine the identification and recommendation of a Preferred Alternative."* (p. 5, TTD packet). We did not locate an in-depth discussion related to why the TTD is choosing a more environmentally disruptive and far more costly alternative, nor which

[5] "Commenters suggested that the action alternatives would reduce traffic congestion to a point that it would encourage existing visitors to travel by car to the 64-Acre Tract, rather than walk or bike, as some currently do." (p. 3-16).

"environmental, social, economic, and technological factors" TRPA and partners considered before recommending Alternative 1.

We do not believe the evidence available supports the environmental findings TRPA will be required to make to approve Alternative 1.

Tree Removal:

Alternative 1 will remove 178 trees over 14" dbh. This is dismissed as significant in large part because TRPA exempts EIP projects from tree removal regulations. Further, the bypass will run through an area that was replanted roughly 30 years ago by volunteers in the area who dedicated the planted trees to loves ones. As noted by comments in the record, many people were unaware that these trees would be removed. We request you consider the individual and cumulative impacts of tree removal in the project area, and the concerns of those who planted the trees in past memorials.

Public Input:

To get a sense of how the community felt about the project, FOWS reviewed the comments submitted on the draft EIR/S/EA, and counted the number of individual comments by residents and business owners on the project. These counts excluded repeated comments by the same individual(s), and comments by regulatory agencies, organizations (including FOWS), and public utilities. Many individual commenters expressed: support for Alternatives 5/6/6a, opposition to the bypass (Alternatives 1-4), support for the bypass, or questioned the need for the project. We summed up the comments expressing support for Alternatives 5/6/6a, and /or opposition to the bypass, and determined roughly 72% of the comments (53 out of 74 comments) do not support the bypass. We request the TTD give due consideration to the interests of the community.

FRIENDS OF THE WEST SHORE
• Protecting Our Watersheds • Wildlife • Rural Quality of Life

Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

April 7, 2015

Subject: Comments on S.R. 89/Fanny Bridge Community Revitalization Project Final EIR/S/EA

Dear Chair Teshara and Members of the Advisory Planning Commission:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments for your consideration of the Final Environmental Impact Statement/Report/Assessment (FEIR/S/EA) for the State Route 89/Fanny Bridge Community Revitalization Project. We also commend staff for the extensive time involved in addressing the environmental documentation on such a short timeline. However, FOWS is extremely concerned that the preferred alternative – the new bypass and elevated bridge over the Truckee River (Alternative 1) – will cause substantial and unnecessary environmental damage to the area, all while costing taxpayers close to $30,000,000. This is not justified, especially in light of the availability of feasible alternatives (Alt. 6/6a, which widen Fanny Bridge). Further, many impacts, including all factors that affect congestion in the area, have not been properly analyzed or addressed in the FEIR/S/EA. Environmental and community concerns include, but are not limited to:

- Addition of 23,136 square feet of new coverage in an SEZ (LCD 1b), which is contrary to TRPA's threshold and RPU requirements to *reduce* coverage in SEZs;
- Increased vehicle trips and VMT associated with increasing vehicle capacity, contrary to TRPA's thresholds and RPU which call for reduced VMT and automobile use;
- Increased traffic along the West Shore;
- Failure to address one of the key causes of congestion at the Wye (pedestrian crossings in Tahoe City), making it questionable how much improvement, if any, will be provided if pedestrian issues in Tahoe City are not addressed;
- Negative impacts to recreational users of the forested areas of the 64-acre Tract;
- Negative scenic impacts from the elevated bridge and bypass, including day and night impacts;
- Removal of a substantial number of trees, including those planted in memorials; and
- Potential impacts, including sewage spills, associated with the movement of the sewer line.

We are also concerned with the rushed process for the environmental document, resulting in the failure to address numerous public comments and concerns. Although the staff report suggests years of public engagement, it is clear from written and verbal comments in the record that many community members were not aware of the scope of this project. Further, 72% of the comments submitted by residents and business owners do not support Alternative 1. In addition, as noted by entities including Liberty Utilities and the Truckee Water Management Association, owners of property affected by the project were not notified in advance and only learned of the proposed project upon release of the draft EIR/S/EA. Finally, business owners in the area have repeatedly expressed concerns about the loss of revenue to their businesses from the bypass, which have not been addressed in the FEIR/S/EA.

In conclusion, the final EIR/S/EA fails to adequately analyze and disclose numerous impacts, and we therefore recommend you do not certify the document until these inadequacies have been addressed. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

Cc: Matt Ambroziak, Central Federal Lands Highway Division

Inadequate Traffic Analysis:

As noted in our comments on the draft EIR/S/EA, there are many inadequacies in the traffic analysis. The Final EIR/S/EA does little to address our concerns, and instead appears to reiterate the draft's conclusions without responding to our detailed comments.

1. The Project's inclusion in the 2012 RTP/SCS was simply based on likelihood of funding, not environmental 'benefits.'[1] There was no analysis of project impacts, or claimed benefits. Therefore, there is no information or analysis from which to 'tier' off of the RTP/SCS EIR. For example, response O5-8 states:

   > "The SR 89/Fanny Bridge Community Revitalization Project was identified in the Regional Transportation Plan (Mobility 2035) as a corridor revitalization project and included in transportation strategy packages A, B, and C. As discussed in Chapter 3, Affected Environment and Environmental Consequences, of the RTP/SCS EIR/EIS most of the impacts in that document address effects from implementation of three Transportation Strategy Packages, which are sets of transportation projects and other transportation actions from the RTP. Therefore, the environmental document for the RTP/SCS did analyze the environmental effects of the project at a programmatic level." (p. 3-189). [Emphasis added]

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Instead, the FEIR/S/EA presents readers with a narrative regarding induced travel and highway capacity increases, attempting to explain that it is so complex as to be impossible to evaluate:

> Several comments assert that reducing congestion in the wye area with the SR 89/Fanny Bridge Project would induce motor vehicle trips and cause vehicle miles traveled (VMT) to increase, because of the improved intersection and roadway operation...Economists use the term "induced travel" to describe the additional demand for travel that occurs as a result of a decrease in travel time or the dollar cost of travel. However, this term can also be misinterpreted to imply that an increase in roadway capacity inherently leads to increases in traffic. In fact, the relationship between improvements in highway operations and traffic volume is very complex, involving trip lengths and travel times, availability of alternative routes, capacity around the improved area, travel behavior responses, residential and business development, and changes in regional population and economic growth. Also, much of the concept of induced travel relates to driver behavior. Predicting driver behavior in response to traffic conditions can easily cross into speculation that is not meaningful for environmental review, because motivations for and levels of urgency or flexibility of vehicle trips can vary widely, as can driver decisions to take on or avoid congested traffic conditions. (Master Response 2, p. 3-9).

The EIR/S/EA could have gathered information on the various factors which affect the relationship noted above, especially as the project objectives have been advertised to include a reduction in traffic congestion. Further, such information used in a proper analysis would provide the information necessary for the document to analyze and disclose whether the project increases, or has no impact on, VMT and vehicle trips. However, this analysis was not performed, and the FEIR/S/EA has nothing more than speculation to support the claim that there will be no induced or generated traffic.

Master Response 2 also claims that studies cited in draft comments are not applicable because, "*The potential for significant effects on increased traffic and VMT is focused on congested urban roadways and highways in larger-population metropolitan areas, where the magnitude of traffic shifts can be substantial (Nolan 2001). Many studies of induced travel relate to the development of substantial additional lane-miles on urban highways, where there is an increase in roadway capacity over a substantial distance (Litman 2015).*" (p. 3-10). This provides no additional evidence to support the conclusion that there will be no induced travel. Rather, this response again speculates that because conditions in the Tahoe area are not like those in larger metropolitan areas, the studies don't apply. Once again, information should be gathered locally, from residents and visitors, to evaluate existing and potential driver behaviors.

Master Response 2 also confirms one of our comments[2] – that by reducing congestion during peak times through adding roadway capacity, people will begin

[2] "Once traffic operation is improved by the SR 89/Fanny Bridge Project, travelers who previously shifted a typical peak-period trip to an off-peak time may later take advantage of decreased peak-period travel times through study area. However, the increase in peak-period trips on the improved facility would replace the off-peak trips, because drivers can travel at their preferred, peak-period time again. In this circumstance, total daily traffic and VMT would not increase; traffic volumes would simply shift in time during the day with no added trips." (p. 3-10).

to take their trips during those times. As more people switch to making trips during peak hours, the congestion will again increase. This is, in fact, one of the reasons the studies cited in our comments on the draft EIR/S/EA states congestion eventually reaches pre-project levels. This conflicts with the lengthy narratives quoted earlier which appear to discount the possibility that congestion will again increase in the future.

3. TRPA's previous estimates of increased vehicle trips and VMT from the project (730 and 4, 669, resp. [2008]) are explained away with more narrative, but no new evidence. Response O5-12 explains why the 2008 estimates are no longer valid, and why the current estimates claim no new trips or VMT.
    a. The response states: "*The 2012 RTP recognized that demographic and economic changes caused a dramatic shift (i.e., decrease) in current and future traffic volumes, compared to previous projections, in part because of the Great Recession. As a result of the decrease in traffic volumes, modeled VMT by passenger vehicles in the Tahoe Region were shown to have decreased in the 2012 RTP."* This is irrelevant, because the EIR/S/EA must analyze and disclose the potential impacts of the project. Reductions in traffic from the Great Recession are temporary, and should have no impact on the potential future impact analysis. The Great Recession did not reduce roadway capacity, narrow lanes, or cause any other physical changes that would make it impossible for traffic to reach pre-Recession levels.
    b. The response appears to suggest the discrepancy in the 2008 model was a result of the model's inability to account for investments in bicycle, pedestrian, and transit service and facility upgrades.[3] However, the FEIR/S/EA (and the RTP/SCS EIR) provide no evidence to show that these investments in the project area have reduced, or will reduce, 760 trips and 4,669 VMT. In fact, countless comments on the DEIR/S/EA discuss how little the new Transit Center is used. In sum, the environmental analysis fails to explain this discrepancy.
    c. The response also suggests that application of the "Trip Reduction Impact Analysis (TRIA) tool yields estimated reductions in vehicle trips," although the response does not provide evidence of how many trips and VMT the TRIA model estimates will be reduced in the project area. Further, as noted in comments on the RPU submitted by traffic expert Joy Dalhgren,[4] there are many problems with the TRIA model.

[3] As with most travel demand models, the Tahoe area model is not able to precisely quantify the traffic reductions resulting from specific bicycle, pedestrian, or transit investments (e.g., the model does not reduce automobile traffic and increase bicycle trips with the addition of a new bike path or lane), because these types of improvements were not included in the model structure. It was realized, during the evaluation leading up to the 2012 RPU and RTP/SCS, that the model did not incorporate the non-automobile transportation policies and investments related to mode split across the proposed alternatives. Thus, it was concluded that the Tahoe area model was not built to provide this type of detailed information and the TDM used in the 2008 RTP was over-predicting personal vehicle trips, because it did not account for investments in bicycle, pedestrian, and transit service and facility upgrades. This resulted in an overestimate of VMT. (p. 3-191).

[4] http://www.trpa.org/documents/reisc/2_Other%20Organizations/North%20Tahoe%20Preservation%20Alliance%20&%20Mountain%20Area%20Preservation%20Foundation.pdf (see pages 17-21).

4. The roadways in the project area are all connected to two-lane highways on each end. As vehicles are forced back into two lanes, (for example, vehicles coming across Fanny Bridge and vehicles traveling on the bypass to drive south on SR 89) there are likely to be bottlenecks in several more locations.

In summary, the FEIR/S/EA lacks evidence to support the claim that traffic trips and VMT will not be reduced as a result of the increased highway capacity, contrary to academic, state, and national information that it will. The FEIR/S/EA gathered no evidence to support various claims regarding driver behaviors, which are acknowledged to affect induced and generated travel, instead relying on lengthy narratives and speculation to assume that there will be no induced trips and VMT. Although the response fails to address another outcome noted in our draft comments – that the reductions in congestion are also temporary because people will begin taking trips during peak hours until levels reach pre-project levels again – the response acknowledges that people will begin traveling more during peak hours (noted above).

Grove Street/Tahoe City Pedestrian Crossing Impacts:

In the public comments submitted on the draft, the pedestrian crossings in Tahoe City were cited as a notable, if not significant cause of the congestion at the Wye, including on S.R. 89 south, in 56 unique comment letters from residents and business owners in the area. Several of these commenters have lived in the area for decades, and are extremely familiar with the traffic conditions during peak summer weekends. As noted in our comments on the draft EIR/S/EA, the document's own transportation appendix also notes the Grove Street pedestrian crossing in Tahoe City as one of the causal factors of the delay at the Wye. Ample evidence suggests that backups on S.R. 89 south of the Wye are affected by delays in Tahoe City. Vehicles heading into Tahoe City are delayed by the uncontrolled pedestrian crossings through town (on S.R. 28), thus causing backups across Fanny Bridge and south on S.R. 89 as vehicles turning left (toward Truckee) are stuck in the line of vehicles because it is a two-lane road. Notably, Master Response 1 includes a full page discussing all of the other factors involved in congestion in this area, including driver behaviors, unfamiliar drivers, mid-block pedestrian crossing activity (in Tahoe City), and traffic congestion on SR 28 east of the wye, which specifically states: "*The mid-block pedestrian crossings near Grove Street further exacerbate these conditions. Lack of capacity on this segment of SR 28 contributes to the long queues on northbound SR 89 in the vicinity of Fanny Bridge and the existing wye intersection."* (p. 3-8).

This would suggest that alleviating peak congestion, and improving pedestrian conditions at Fanny Bridge, may be resolved by simply addressing the pedestrian crosswalks in Tahoe City and making minor improvements to Fanny Bridge. In fact, commenters provided several suggestions to 'test' this theory for one year – before causing the environmental damage and tax-payer expense associated with the new bypass and bridge.

Yet the project dismisses this information entirely, instead stating: "*Congestion at the Grove Street/SR28 intersection caused by pedestrians is not within the scope of the project (see Master Response 1, Comments Related to Project Purpose and Need*)" (p. 3-

192). However, given the objective of the project includes reducing congestion at the Wye, it makes little sense to exclude from review the potential causes of the congestion.

Input from local residents most familiar with traffic conditions is also dismissed:

> Some comment letters provide observational evidence to support the contention that there is little to no congestion in the area surrounding the wye, both as personal experience and photographs. While personal observations of congestion can be helpful, inherently, congestion does not occur continuously, but rather during heavy traffic and pedestrian use periods, so single observations or photographs or a small number of observation days can overlook heavily congested periods. Also, in a community where seasonal visitor traffic contributes substantially to local traffic volumes, peak traffic patterns and timing are different from average annual conditions. (p. 3-6).

Notably, unlike decades of observations by locals (including public transit drivers, river raft shuttle drivers, and others who would be on the roadway during peak times), the environmental analysis is based on traffic counts and models that "[do] not account for all of the driver-based field behaviors and human factors…" without extensive calibration effort (which was not done). The traffic counts also do not consider the impacts of pedestrian activity in Tahoe City, nor the impacts of that activity on the Wye and south on S.R. 89. In fact, as the Final EIR/S/EA notes in numerous responses, downtown Tahoe City is not within the project area and therefore was not included in the analysis. However, the traffic and pedestrian activity in these areas impact traffic operations throughout the entire area - from east of Tahoe City on SR 28, through the downtown, to the Wye, south on SR 89, and north on SR 89. Looking at just one segment of the entire area without considering how it fits into the larger picture makes little sense. As a result, there is no evidence to support the contention that Fanny Bridge is the primary cause of congestion at the Wye, and thus no evidence to support the claim that a new bypass is needed to address this problem. On the other hand, there is ample information suggesting the need to examine and document the impacts of the pedestrian crossings in Tahoe City on congestion at the Wye – however the FEIR/S/EA fails to do so.

Purpose of Project:

As noted in our comments on the DEIR/S/EA, the proposed bypass is not likely to reduce congestion in the long run, will likely result in increased VMT and vehicle trips, does not address all causes of congestion at the Wye, and there are less intrusive and damaging alternatives available to improve pedestrian safety (e.g. Alt. 6/6A) on Fanny Bridge. Therefore, we raised questions regarding the actual purpose of the project. Based on information in the DEIR/S/EA, the Economic Report for Fanny Bridge, and as referenced by the Executive Director of the TTD last month (excerpt below), it appears some of the push for the proposed project may be related to potential future developments in Tahoe City (e.g. the Hendrickson "Opportunity" Project), rather than merely correcting existing problems.

> Proposed benefits of the project: Safety; two points of ingress and egress for the West shore, fewer bike and pedestrian conflicts with vehicles, congestion Improvement, complete street implementation; the old alignment becomes a local county street, catalyst for economic development at the North end of Tahoe City, the bike trail along the river, and operational improvements for traffic, transit, and goods movement. (Carl Hasty, APC March 11, 2015) [Emphasis added].

The FEIR/S/EA does not address these comments.

Scenic Impacts:

Elevated bypass and bridge:
The scenic impacts of an elevated new bridge and bypass across the 64-acre Tract have not been examined. We identified this failure in our comments on the draft, however, no new images to assess these impacts were provided in the final. For example, although the draft EIR/S/EA notes key viewpoints and observation points within the 64-acre Tract, there are no visuals to illustrate what the elevated bypass will look like at these viewpoints. The FEIR/S/EA does not address this discrepancy.

The draft and final EIR/S/EA documents also fail to provide ground-level images of what the alternatives will look like compared to existing conditions. Although additional simulations were provided at the 2/26/2015 TTD public workshop, they consisted primarily of images from aerial viewpoints, and therefore do not provide a means for the public to assess the impacts at the level the public will be viewing the new structures from.

The FEIR/S/EA also fails to examine the scenic impacts of the elevated bridge and bypass from locations required by the TRPA scenic thresholds, including bike paths, public areas, surrounding mountains and hiking trails, and Lake Tahoe.

Night sky:
The impacts of the light from vehicle headlights have not been addressed, and the response to these concerns includes more narrative and speculation:

> Light and glare associated with headlights along the realigned portion of SR 89 would not substantially affect sensitive receptors in the study area. As stated on page 4.14-36 of the Draft EIR/EIS/EA, existing light sources on and around the project site includes vehicle lights on SR 89. Headlights along the realigned section of SR 89 would be pointed in the direction of travel (generally east to west or west to east), which would not be toward residential units. While headlights create limited amounts of spillover light, this would be shielded by the presence of trees throughout the project site. Recreation users would not be expected within the 64-Acre Tract after dark for extended times, and would, therefore, experience headlights for a limited period, such as just prior to sundown. (p. 3-21)

Yet there are no diagrams or information to assess the impacts of headlights – which will actually be aimed in *all* directions at the roundabouts (which are *circles*), not the existing N/S or E/W directions of the highway as the response suggests. Night light impacts may affect the residential areas southwest of the project area, given the elevation of the western roundabout and the raised location of neighborhoods in that area. Also, as no surveys have been done to assess recreationists' use, experience, and impacts from the

project, there is no information to base the statement that recreation users would not be impacted by lights because they "would not be expected to be within the 64-acre Tract after dark for extended periods of time."

Further, the DEIR/S/EA information regarding this impact notes headlights on SR 89 as an existing light source:

> Existing light sources on and around the project site include lighting at the Caltrans Maintenance Facility, the County buildings on the north side of SR 89, the existing Transit Center on the north end of the 64-Acre Tract and development located to the south and southeast of the 64-Acre Tract, from street lights and parking lot lights in Tahoe City, street lights and signal lights in the wye intersection area, lights at businesses just south of Fanny Bridge, and vehicle lights on SR 89. (DEIR/S/EA, p. 4.14-36). [Emphasis added]

However, the 'analysis' of the impacts of Alternative 1 does not discuss the impacts of headlights.

> Operational Phase
> Under this alternative, new sources of light would include lighting for the bicycle/pedestrian undercrossing of bridge, lighting on the new bridge, street lighting at the two roundabout intersections and lighting at the entrance to the Transit Center onto the newly localized road (relinquished portion of SR 89). Rehabilitation or replacement of Fanny Bridge and modifications to the free-right turn lanes would not result in a substantial change to lighting conditions in the wye area. Modifications to the Caltrans maintenance facility, T-TSA sewer line, and NSEF sewer export main would not result in a substantial change to existing lighting conditions. There are no sensitive receptors for nighttime lighting in the vicinity of the new bridge. The nearest residential area to the eastern roundabout is approximately 350 feet to the southeast and is screened by dense coniferous forest. There are few sensitive receptors to nighttime lighting in this area. Compliance with Caltrans standards for roadway lighting would be part of the project. Thus, because the project lighting would be limited to the new bridge, intersections, and roundabouts, would be located in areas that do not have receptors sensitive to nighttime lighting, and would have to comply with Caltrans standards for roadway lighting, this impact would be less than significant. (DEIR/S/EA, p. 4.14-36).

As a result, the FEIR/S/EA still fails to analyze and disclose the impacts of headlights on night sky, and to adjacent residential areas.

Recreation Impacts:

As noted in our comments on the draft EIR/S/EA, there is no evidence upon which to analyze and disclose the impacts to recreation experience. Notably the following impact was included for analysis in the draft: "Impact 4.13-4: Effects on the quality of recreation use experience." However, no surveys were gathered to assess existing user experiences and to ask users how a bypass through the forested area would impact their experience. Instead, the final, like the draft, reiterates speculation and narrative to 'conclude' that users already expect urban features nearby, and therefore should not find their experience impacted by the new bypass.

As noted in our comments on the DEIR/S/EA, past recreation surveys indicate that most users of the 64-acre Tract did not drive there – they walked from their homes or lodging units. We raised the question of how many people may choose to drive to another less

impacted recreation area for their recreation after the bypass is built, and what the traffic implications of this would be. However, Master Response 3 incorrectly states what our comments were,[5] and in doing so, fails to address the actual question (see p. 42, FOWS 2/17/2015 comments on DEIR/S/EA; excerpt below):

> However, if a new bypass is added, this will bisect the now valued open space and recreation benefits of the 64-acre Tract. As a result, people may opt to visit (drive to) other less developed areas to recreate, thereby creating more vehicle trips…***Further, surveys need to assess whether the 70+% of recreation users who walk to the area from their homes or lodging locations will instead drive to recreate if the bypass is constructed. Such impacts to VMT and vehicle trips must be included in the revised transportation analysis.***

Finally, although the EIR/S/EA claims the recreation experience will be enhanced due to certain trail connections, more access to the 64-acre Tract (although ample access already exists), and reduced conflicts on Fanny Bridge, in failing to assess the impacts on recreation users' experience, the document also fails to assess how the new bypass across the now forested area and the Truckee River, may impact tourism if the experiences associated with hiking, biking, walking, and rafting in the area are negatively impacted.

New Land Coverage:

Alternative 1 will add 23,136 square feet of new coverage in an SEZ (LCD 1b), and 191,664 square feet of new coverage in total. This conflicts with TRPA's SEZ thresholds which require a reduction in coverage on SEZs. However, the FEIR/S/EA claims the impacts are less than significant because TRPA's Code allows exceptions for public facilities, and that a certain amount of unidentified mitigation will occur 'somewhere.' As noted in our comments on the draft EIR/S/EA, the exemption in the Code only applies to situations where no feasible alternative is available. However, as noted by the EIR/S/EA, Alternatives 6 and 6a are "feasible." These alternatives would add 11,761 (Alt. 6a) and 12 197 square feet (Alt. 6) of new coverage in LCD 1b – far less than Alternative 1. In addition, as noted in comments by Jim Sajdak, it appears a modified, narrower version of Alternative 6a could be viable, which may reduce this coverage even more. Further, Alternative 6a (at the existing size) will result in a total reduction in coverage.

Oddly, the response to comments includes a narrative, stating: "*As described in Chapter 2, TRPA, as one of the three Lead Agencies, must approve a preferred alternative that would be considered the most reasonable when environmental, social, economic, and technological factors are assessed."* (p. 3-193). TRPA's primary requirement includes making environmental findings related to the TRPA thresholds. In addition, the response further states: "*Please refer to the TTD and TRPA staff reports for a discussion related to the selection of the preferred alternative*." However, the APC staff report includes roughly four pages describing primarily past coordination activities related to the project, followed by detailed pages regarding Alternative 1 impacts. We did not locate an in-depth discussion related to why TRPA is choosing a more environmentally disruptive

[5] "Commenters suggested that the action alternatives would reduce traffic congestion to a point that it would encourage existing visitors to travel by car to the 64-Acre Tract, rather than walk or bike, as some currently do." (p. 3-16).

alternative, nor which "environmental, social, economic, and technological factors" TRPA considered before recommending Alternative 1.

We do not believe the evidence available supports the environmental findings TRPA will be required to make to approve Alternative 1.

Tree Removal:

Alternative 1 will remove 178 trees over 14" dbh. This is dismissed as significant in large part because TRPA exempts EIP projects from tree removal regulations. Further, the bypass will run through an area that was replanted roughly 30 years ago by volunteers in the area who dedicated the planted trees to loves ones. As noted by comments in the record, many people were unaware that these trees would be removed. We request you consider the individual and cumulative impacts of tree removal in the project area, and the concerns of those who planted the trees in past memorials.

Public Input:

To get a sense of how the community felt about the project, FOWS reviewed the comments submitted on the draft EIR/S/EA, and counted the number of individual comments by residents and business owners on the project. These counts excluded repeated comments by the same individual(s), and comments by regulatory agencies, organizations (including FOWS), and public utilities. Many individual commenters expressed: support for Alternatives 5/6/6a, opposition to the bypass (Alternatives 1-4), support for the bypass, or questioned the need for the project. We summed up the comments expressing support for Alternatives 5/6/6a, and /or opposition to the bypass, and determined roughly 72% of the comments (53 out of 74 comments) do not support the bypass. We request the APC give due consideration to the interests of the community.

FRIENDS OF THE WEST SHORE
• Protecting Our Watersheds • Wildlife • Rural Quality of Life

Tahoe Regional Planning Agency
Attn: Mr. Brian Judge
PO Box 5310
Stateline, NV 89449

March 9, 2015

Tahoe Transportation District
Attn: Mr. Alfred Knotts
PO Box 499
Zephyr Cove, NV 89448

Subject: Additional Comments on S.R. 89/Fanny Bridge Community Revitalization Project

Dear Mr. Judge and Mr. Knotts:

We appreciate TRPA's willingness to extend the public comment period on the draft EIR/EIS/EA for the State Route 89/Fanny Bridge Community Revitalization Project (Fanny Bridge Project). Based on additional information provided during the 2/25/2015 GB hearing, the 2/26/2015 Tahoe Transportation District workshop, and other correspondence, we have reviewed the document in greater detail and provide the following additional comments.

Environmental Analysis not adequate:

Overall, the DEIR/S/EA fails to adequately analyze the environmental impacts of the project and disclose significance. Problems include, but are not limited to:

- Conclusions of significance (or lack thereof) are based on technically inadequate analyses (such as the transportation analysis and its failure to disclose the increased traffic that will result from the project),
- Insufficient evidence (i.e. noise, recreation, and scenic impacts),
- Speculation substituted for face (e.g. recreation, transportation),
- Erroneous justifications (e.g. because project will meet current regulations, there is no impact),
- Application of regulatory exemptions to reduce significance, however this does not negate the requirement for the EIR/S/EA to disclose impacts (e.g. new soil coverage),
- Failure to analyze potential hazardous impacts associated with moving the TRI sewer line; and
- Conflicting information in the record (i.e. the document concludes no increase in trips south on S.R. 89 resulting from the project, but the LOS numbers do not add up).

As a result, the document erroneously concludes no significant impacts to any resource area from the project. Such conclusions are not only unsupported by the DEIR/S/EA, but also defy logic. A new, elevated highway bypass and bridge will be constructed in natural areas where currently no development beyond pedestrian and bike paths exists (in the remaining 35 acres of forested area of the "64-acre tract"). Highway capacity will be increased. It is inconceivable that this project will only result in less-than-significant impacts.

We also note that even without accounting for the increased vehicle trips resulting from expanding highway capacity, **the DEIR/S/EA reveals that all Action Alternatives (and moreso the bypass alternatives) will *worsen LOS conditions* (meaning more 'congestion') compared to the No Action Alternative.** This runs counter to the claims this project will 'reduce congestion' and provide related environmental benefits.

USFS Decision to perform Environmental Assessment (EA):

The USFS choice to only analyze the project with an EA does not meet NEPA requirements, which state that if a project may have significant impacts, a full EIS must be performed (42 U.S.C. § 4332). As noted in our comments, there are significant and potentially significant impacts, therefore the USFS must initiate the EIS process for this project. Notably, the Project Scoping Report also recommended a full EIS be performed to satisfy NEPA requirements (p. J-5).

Appearance of Prejudice toward one alternative:

EIS, EIR, and EA documents must not be used as a means to simply justify the desired alternative. However, for multiple reasons detailed below, the DEIR/S/EA and other documents in the record give the appearance that the lead agencies have already selected Alternative 1 (or some variation thereof), and the DEIR/S/EA was crafted to justify this decision, rather than to objectively examine other alternatives, including variations proposed by the public during the scoping period.

Intent of Project vs. Outcome of Project:

The primary needs for the project have, for decades, involved: 1) reducing vehicle congestion in and around Fanny Bridge; 2) improving pedestrian safety in the area, and reducing pedestrian impacts on traffic; and 3) upgrading Fanny Bridge. However, as noted in the DEIR/S/EA, pedestrian activity in Tahoe City has a significant impact on vehicle congestion in the area, yet the project area does not address the core of Tahoe City. What is not known or disclosed in the DEIR/S/EA is the extent to which pedestrian movements in Tahoe City affect traffic within the project area. It is clear that the entire area must be examined comprehensively to truly assess what roadway improvements will most improve conditions. In other words, the true 'project area' should encompass the Fanny Bridge area and the downtown Tahoe City area, so that impacts, causal factors, and potential improvements can be evaluated from the appropriate scale. The piecemeal approach currently proposed - to approve the Fanny Bridge project, and then start looking at Tahoe City mobility issues - makes little sense. In light of the approximate $30 million cost to taxpayers (federal, state, and local), this decision must be based on what will best serve the needs of the public, and not waste taxpayer dollars and cause irreparable damage to the environment.

Public Process Concerns:

We were disturbed to hear statements during the 2/25 TRPA GB hearing, and the 2/26 TTD public workshop, which criticized the need to perform an EIR/S/EA. Project proponents expressed dislike for doing these documents, instead favoring 'collaboration' and discussions to mold the project (this was often stated in attempts to respond to public concerns by saying the bridge design had been narrowed, and elevation reduced compared to the DEIR/S/EA). This disinterest for public process, and requirements to ensure the environmental impacts of such projects are carefully analyzed and disclosed, is of great concern.

It is also noteworthy that the DEIR/S/EA concludes **no beneficial environmental impacts** for the bypass alternatives (1-4), other than VMT per capita (which is based on a flawed analysis). *"Less-than-significant" impacts are not "beneficial impacts".* Our detailed comments are attached. We herein incorporate comments submitted by the Tahoe Area Sierra Club, League to Save Lake Tahoe, and Jim Sajdak. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President,
Friends of the West Shore

Jennifer Quashnick
Conservation Consultant
Friends of the West Shore

Cc: Matt Ambroziak, Central Federal Lands Highway Division

Attachments: 2/25/2015 Powerpoint Presentation excerpts – by TTD and TRPA

Environmental Analysis not adequate:

We note the significance of an impact must be determined based on substantial evidence in the record:

> CEQA documents also must explicitly identify each impact the agency has determined to be significant (*Id.* at § 15126.2, subd. (a)). These significance determinations must be "based on substantial evidence in the record" (*Id.* at § 15064, subd. (f)).[1]

Substantial evidence is defined[2] as:

> (1) For the purposes of this section and this division, substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact.
> (2) Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. [Emphasis added]

In an effort to better clarify the inadequacies of the analysis, we have summarized key examples of improper conclusions in the document in the table below: "*Review of Selected Resource Impacts, Intensity of Impact, and Stated Reason for Insignificance*." Notably, NEPA, CEQA, and the TRPA Compact require environmental impact determinations be based on evidence in the record, and the DEIR/S/EA fails to meet these requirements.

Review of Selected Resource Impacts, Intensity of Impact, and Stated Reason for Insignificance					
Resource	**Impact**	**Intensity of Impact (Stated signficance before mitigation)**	**Stated Reason for Insignificance**	**Why Stated Reason is not Convincing**	**Should be:**
Agricultural and Forest Resources	Impact 4.1-1: Tree Removal	Alternatives 1-4 will remove 178 trees > 14" dbh (PS)	Exempt from regulations because project is on EIP list;	N/A - regulatory exception; does not negate impact as Potentially Significant	PS
			Project will follow TRPA requirements in Chapter 61	N/A - following existing requirements does not negate impact as Potentially Significant	PS

[1] www.opr.ca.gov/docs/NEPA_**CEQA**_Handbook_Feb2014.pdf

[2] § 21080 (e)

Agricultural and Forest Resources	Impact 4.1-2: Conversion of Forest Land	Alternatives 1-4 will convert over 4 acres of land to highway use (LTS)	Other forest land on project site will be conserved, and regional forest land composition and distribution would not be altered	Document relies on CEQA significance criteria for NEPA analysis; CEQA criteria include: "result in substantial tree removal; result in the loss of forest land or conversion of forest land to non-forest use;..." No percentages are included, therefore any conversion of forest land to non-forest use must be identified as a significant impact.	S
Biological Resources	Impact 4.3-2: Disturbance or loss of sensitive habitats (jurisdictional wetlands, riparian vegetation, and SEZ)	0.53 acres of SEZ (S)	Will follow TRPA regulations to avoid disturbing more	N/A - following existing requirements does not negate disclosing impact as Significant	S
			Will notify CDFW before activity	N/A - following existing requirements does not negate disclosing impact as Significant	S
			Will mitigate somewhere else, will pay mitigation fee, and/or will develop mitigation and monitoring plan	No information provided regarding where/how/if mitigation will work (PS)	PS
Wildlife	Impact 4.3-4: Disturbance or loss of special-status wildlife species and habitat	Refers to loss of individuals or nests (PS)	Conduct pre-construction survey and modify project "to the extent feasible."	Mitigation does not ensure impacts will be avoided, especially due to 'extent feasible'	PS
Geology/Soils/ Land Coverage	Impact 4.5-4: Land Coverage.	Alternatives 1-4 will increase coverage in SEZ 0.5 acres or more. (LTS)	Complies with TRPA's land coverage regulations	N/A - following existing requirements does not negate impact as Potentially Significant	PS
				Fails to look at localized impacts	PS

GHGs	Impact 4.6-1: GHG emissions and consistency with the Regional Transportation Plan	Zero increase in GHGs (LTS)	Consistent with RTP	RTP did not examine emissions from project. (2008 RTP did examine, estimate, and note increased GHGs from project)	S
				Poor analysis - incorrectly assumes no increase in vehicle trips and VMT from project (see transportation comments)	S
Hydrology and Water Quality	Impact 4.7-1: Surface Water Quality	Ground disturbance and construction activities; sediment loss; release of hazardous materials (LTS)	Rules will be followed.	N/A - following existing requirements does not negate impact as Potentially Significant	PS
				Fails to address impacts from relocation of TRI	PS
Hydrology and Water Quality	Impact 4.7-2: Groundwater Interception	Unknown - relative amounts for bridge, unknown for sewer line relocation (LTS)	Project components will be isolated and TRPA rules will be followed.	N/A - following existing requirements does not negate impact as Potentially Significant	PS
				Fails to address impacts from relocation of TRI	PS
Hydrology and Water Quality	Impact 4.7-3: Stormwater runoff and drainage capacity	Increased in impervious surfaces: Alt. 1-4 of > 4 acres (LTS)	Complies with TRPA's land coverage regulations	N/A - following existing requirements does not negate impact as Potentially Significant	PS
				Fails to consider location of surfaces and other factors affecting runoff and drainage	PS
Noise	Impact 4.10-3: Long-term noise impacts	TRPA/CEQA: > 3 db CNEL increase and new noise source from bypass (S)	Will consider features during design to reduce noise "to the extent feasible."	Poor analysis - incorrectly assumes no increase in vehicle trips and VMT from project (see transportation comments); Relies on inappropriate	S

				data (see noise comments)	
				Given ability to reduce noise through design is unknown and not analyzed, this remains a Significant impact	S
Utilities	Impact 4.12-1: Utility Service Lines	No conflicts with utility lines (LTS)	Realignment of TRI sewer line included in Alts. 1-4; otherwise standard permitting conditions require contractors to identify other lines	Sanitation Agency submitted detailed comments regarding conflicts with TRI line; not addressed in DEIR/S/EA	PS
				N/A - following existing requirements does not negate impact as Potentially Significant	PS
Recreation	Impact 4.13-3: Reduction of public forest land available for dispersed recreation	Alt. 1-3 will convert 3.2 acres (9% of remaining 35 acres in project area); Alt. 4 will convert 3.4 acres; Alt. 6/6a will convert 0 acres. (LTS)	Conversion is less than 10 % of 35-acre area and people will still be able to recreate around the bypass	NEPA significance criteria: "An alternative is determined to result in a significant impact related to recreation resources if it would:y adversely alter or decrease the recreation resource values of the project area to the extent that recreational user experience or opportunity is substantially diminished." As the criteria do not identify any 'acceptable' amount/percentage of loss of available land, any impact would be significant.	S

	Impact 4.13-4: Effects on the quality of recreation use experience	"Expectations are typically influenced by user experiences, physical characteristics of the recreation resource setting, and perceptions about the level and pattern of use…" (LTS)	"While survey research data is not available to precisely define user expectations and perceptions in the study area, the existing setting would make it reasonable to anticipate that expecations reflect the understanding of the area…"	Failure to obtain survey data; no evidence to assess this impact (available evidence suggests most favor the current experience - see recreation comments)	PS/S
				Consultant and agency speculation can not be substituted for a survey of recreationalist's experiences and expectations	PS/S
Scenic Resources	Impact 4.14-2: Change the existing visual character or quality of the project site after completion	Alt. 1-4 will add elevated bypass, bridge, and roundabouts to area that is currently open forest and river (PS)	Minimize the visual intrusion with vegetation/etc.	Failure to address impacts of new structure from multiple viewpoints both within and outside of the project area (see scenic comments)	PS/S
				Failure to address impacts to Key Observation Points (see scenic comments)	PS/S
				Failure to examine impacts at ground level	PS/S
Scenic Resources	Impact 4.14-4: Create a new source of light and glare that would adversely affect day or nighttime views in the area	Adds new light fixtures/etc. (LTS)	New light fixtures will be designed per existing regulations	N/A - following existing requirements does not negate impact as Potentially Significant	PS
				Fails to address impacts on nighttime views from headlights on elevated bypass and	PS

				in new area	
Transportation	Impact 4.15-1: Roadway Segment Operations	no increase in trips; LOS maintained (LTS)	Project will not increase trips; Alt.s 1 & 4 will meet LOS standards	Fails to address increase in vehicle trips and VMT from project; (see transportation comments)	PS
				Fails to address impacts of pedestrian activity within and adjacent to project area on roadway operations	PS
		no increase in trips; LOS exceeded in 2038 for Alt.s 2 & 3 (S)		Fails to address increase in vehicle trips and VMT from project; (see transportation comments)	PS
				Fails to address impacts of pedestrian activity within and adjacent to project area on roadway operations	PS
				Proposes mitigation in 20+ years involving expanding lanes on bypass. Ignores other environmental constraints, TRPA regulations, etc. This mitigation must be evaluated as reasonably foreseeable under these alternatives.	PS
Transportation	Impact 4.15-2: Intersection Operations	Impacts to intersections; significant impact to Granlibakken and 89 intersection (S)	Pay traffic impact fees to County	Paying fees does not lessen the impact	S
				Document suggests Placer County may use fees for future capital improvements at intersection, but nothing requires this or shows how this	S

				possible future project will mitigate the impact	
				Project relying on an agency to follow a certain action in the future without assurance it will be done; Placer County is also not a lead agency for the EIR/S	S
				Fails to address increases in vehicle trips and VMT from project	S
Transportation	Impact 4.15-3: Vehicle miles of travel per capita[a]	Increase or decrease in VMT per capita (LTS)	Decrease for Alt.s 1-4 because distance of one travel route will decrease; no change for Alt. 6/6a	Fails to address increases in vehicle trips and VMT from project (induced travel and traffic generation)	S
			"This simplified analysis does not account for induced demand that may result if motorists choose to travel during the peak hours once the project is implemented. However, it can be logically assumed that these trips are occurring sometime during the day other than the peak hour, so the VMT in the study area likely would not change as a result of project implementation."	Speculation can not be substituted for substantial evidence.	S
				NOTE: 2008 RTP estimated increases in VMT	
Notes: LTS = Less-than-significant; PS = Potentially Significant; S = Significant					
a. Table 2-1 lists Impact 4.15-3 as VMT per capita; however p. 4.15-42 lists just VMT.					

Less-than-significant vs. Beneficial

Impacts may be deemed less than significant when compared to significance criteria, but this does not mean impacts are beneficial. The many presentations and materials from the lead agencies have touted environmental benefits from this project, however even with many technical inadequacies in the DEIR/S/EA, the document concludes that all environmental impacts for Alternative 1 (the proposed action) are less than significant (with one exception).[3] **This is not the same as 'beneficial.'** The only 'beneficial' environmental impact is related to VMT (Impact 4.15-3), however as noted in our comments, the traffic analysis is flawed and does not support this conclusion. For Alternatives 2-4, most environmental impacts are less-than-significant or significant and unavoidable. For Alternatives 6 and 6A, the outcomes are similar (mostly 'less-than-significant') however there is a beneficial impact related to Impact 4.7-3, Stormwater runoff and drainage capacity. In summary, we request the document and the lead agencies clearly explain the difference and clarify the actual environmental benefits (if any) and impacts to the public.

USFS Decision to perform Environmental Assessment (EA):

The USFS choice (or Caltrans choice per agreement with the USFS) to only analyze the project with an EA does not meet NEPA requirements, which state that if a project may have significant impacts, a full EIS must be performed (42 U.S.C. § 4332). As noted in our comments herein and from 2/17,[4] an evaluation of the context and intensity of the project's impacts[5] reveals numerous significant and potentially significant impacts.

In addition, the EA appears to be 'tacked on' to the EIR/S in a process that is being rushed forward in an effort to secure federal funding for the project. However, NEPA (CFR 40 1502.5) requires the EA be prepared early enough so that it "*can serve practically as an important contribution to the decisionmaking process and will not be used to rationalize or justify decisions already made (§§1500.2(c), 1501.2, and 1502.2).*"[6] In the event the USFS may attempt to rely on the EIR completed per CEQA, NEPA also requires that *"a Federal agency may not use a completed EIR to meet its own requirements until the Federal agency has reviewed the CEQA document and accompanying administrative record and determined that it satisfies all the agency's NEPA requirements."* As pointed out herein, the DEIR/S/EA fails to accurately assess and disclose the environmental impacts of the project.

Appearance of Prejudice toward one alternative:

EIR, EIS, and EA documents must not be used as a means to simply justify the desired alternative.[7] However, for multiple reasons discussed below, the DEIR/S/EA and other documents in the record give the appearance that the agencies have already selected Alternative 1 (or some variation thereof), and the DEIR/S/EA was crafted to justify this decision, rather than to objectively examine all alternatives, including variations proposed by the public during the scoping period (for example, Jim Sajdak has provided extensive

[3] Impact 4.5-2 Siesmic hazards is considered beneficial for all Action Alternatives. However, we note this project is not required to address these hazards, and such repairs can be performed for approx.. $400,000.
[4] http://friendswestshore.org/wordpress/wp-content/uploads/2015/02/FOWS-comments-on-FannyB-SR-Realign-DEIR.EIS_.EA-2.17.2015.pdf
[5] The NEPA determination of significance is based on context and intensity. (40 C.F.R. § 1508.27.)
[6] http://www.ecfr.gov/cgi-bin/text-idx?SID=af0f370f459101e537010df53a872d8e&node=se40.33.1502_15&rgn=div8
[7] E.g. NEPA, Section 1502.2(g)

information regarding other feasible alternatives to widen Fanny Bridge to a lesser extent than Alternatives 6 and 6A). Examples include:

1. The DEIR/S/EA states that Alternative 1 is "considered by the lead agencies to be the 'proposed action'." (p. 3-1). This statement creates prejudice from the beginning of the DEIR/S/EA.
2. In a TTD presentation to the Governing Board on 2/25, the presentation focused on Alternative 1 as the "Proposed Action," noting claimed benefits and including three images of Alt. 1.
3. TRPA's Executive Director opened the presentation by discussing how *the bypass* has been 'contemplated in this location' (crossing the 64-acre Tract) for over twenty years, and also stated 'in response to a question last month about whether the environmental thresholds had been considered with this project,' the answer was an "unequivocal yes."
4. A TRPA staff member presented information relating to TRPA's Environmental Improvement Program, with a slideshow that ran through the presumed 'benefits' of Alternative 1.[8] These statements and presentations indicate a clear bias toward Alternative 1, although the non-bypass alternatives have also been identified as feasible.
5. In addition, included in the "*Economic Analysis of the State Route 89/Fanny Bridge Community Revitalization Project*"[9] (Economic Report) are repeated references favoring the new bypass, without equal consideration of Alternatives 6 and 6A. In fact, the Economic Report dismisses from detailed review all alternatives except Alternative 1:

> Project "Alternative 1" (defined in detail in Chapter 4) accomplishes this goal [keeping Fanny Bridge open for traffic], and is the primary subject of this economic analysis and quantification of potential impacts. Throughout this report, reference to the "Project" relates to Alternative 1 unless otherwise specified. (p. 1).[10]

6. The Economic Report also appears to push for Alternative 1 as part of a larger economic scheme involving nearby redevelopment:

> "**The Project supports several nearby redevelopment initiatives, which can provide substantial economic benefits to the region, including jobs, sales activity, and municipal revenues**. For example, the feasibility of a 75-room hotel constructed on one of the nearby redevelopment sites will be enhanced by the improvement of traffic flow and an enhanced pedestrian environment…" (p. 3)
>
> "**The magnitude of benefit realized by the Project depends on the quality of subsequent implementation actions related to positioning and marketing a new "Fanny Bridge District."** The degree to which this impact to visitation is realized relies not only on the Project, but on several other factors, including redevelopment of key nearby parcels…" (p. 4)
>
> The Project is an important piece of a multifaceted effort to enhance the town's visitor appeal. Relieving traffic congestion is likely to help transition the image of Tahoe City from one of a congested commercial core to that of a more welcoming, appealing, pedestrian-friendly tourism district, especially during the summer season when most businesses see their peak economic activity…
>
> Several strategically located parcels could accommodate new investment. Examples include the "Henrickson Building;' the old Tahoe City fire station; the Tahoe City Golf Course…and other properties located near the existing Wye. These properties have long been observed as potential investment opportunities by both the public and private sectors. The benefits conferred by the Project

[8] Powerpoint Presentation by staff member, Brian Judge, provided to GB on 2/25/2015 (attached).
[9] http://tahoetransportation.org/images/assets/sr89-fannybridge-econ-study-draft.pdf
[10] We also note that Alternatives 6 and 6A also keep Fanny Bridge open to vehicular traffic.

> may tip the balance toward improved feasibility as the result of improved walkability and creation of a defined district. (p. 27-28). [Emphasis added]

It appears certain investors may be interested in the new bypass alternative to presumably justify new developments in Tahoe City. There is no need, purpose, or objective included in the Fanny Bridge Project supporting redevelopment opportunities in Tahoe City. Further, if this project aims to correct problems from existing levels of use, the addition of more visitors (and their vehicles) would run contrary to the need and purpose of this project.

Based on the DEIR/S/EA's own conclusions regarding worsening LOS conditions, the FEIR/S/EA must clarify the actual need, purpose, and objectives for this project. If the project is being proposed primarily for the purpose of creating a "Fanny Bridge District," then it should not be proposed as a transportation project.

Tiering from RTP:

As noted in our 2/17 comments, the Fanny Bridge Project was merely listed in the RTP based on the likelihood of funding. We could not locate any analysis in the 2012 RTP documents evaluating the impacts of the proposed project on VMT, trips, GHGs, or other environmental thresholds. The most recent information we could locate is from the 2008 RTP, which reveals increases in all transportation-related parameters. Because the RTP did not examine the Fanny Bridge Project "*at a sufficient level of detail in the prior environmental report to enable those effects to be mitigated or avoided by site specific provisions, the imposition of conditions, or by other means in connection with the approval of the later project*" (§ 21094)**,** the DEIR/S/EA cannot tier from the RTP EIR/S and must now analyze the impacts of the project.

Public Process Concerns:

As summarized by the California Office of Planning and Research: "Public involvement in the NEPA and CEQA review process is critical for the overall framework of informed decision making. Public review serves as a check on accuracy in analysis. Public comments inform agencies about public opinions and values."[11]

During the 2/25/2015 GB hearing, and the 2/26/2015 TTD public workshop, the public was repeatedly told the DEIR/S/EA examined the 'worst case scenario,' and that in recent discussions (not public), project designers have worked to lessen the width and reduce the elevation of the new bridge and bypass. These statements appeared to be made to alleviate concerns about the size and scale of the project that were based on the DEIR/S/EA descriptions.

The TTD's director expressed a dislike for the CEQA/NEPA/TRPA process and implied that it would be easier to discuss the options in some other way. However, the reason for the DEIR/S/EA is to evaluate and disclose the environmental impacts of the project for the public and decision-makers. Public processes such as NEPA and CEQA are in place for a reason. This disregard for public process and adequate analysis and disclosure of environmental impacts is extremely concerning, even moreso in light of the rushed schedule for approval of this project.

[11] www.opr.ca.gov/docs/NEPA_**CEQA**_Handbook_Feb2014.pdf

We are also concerned with how this project has been presented to the public, the Board, and others. As noted in the attached slides, the project is advertised as having several 'environmental benefits' – including a reduction in congestion, air pollution, and GHGs, yet the conclusions in the DEIR/S/EA do not support this and in fact, reveal otherwise. A "less-than-significant" impact is not a 'beneficial' impact, however presentations and statements to the public appear to be misrepresenting the difference between these conclusions.

Confusion with the Purpose and Need for Project and Alt. 1:

The Fanny Bridge Project has long been listed as a project which aims to 'improve congestion and traffic flow' in the area. The DEIR/S/EA states: "The primary needs for the proposed project relate to the current traffic congestion and inadequate safety and travel conditions in and around the Fanny Bridge and SR 89/28 wye intersection area. During peak travel periods, vehicle queues are very long and persistent, because of the current configuration of Fanny Bridge and the wye intersection, including delay caused by bicycle and pedestrian activity very close to travel lanes on and around Fanny Bridge…" [Emphasis added]. (DEIR/S/EA, p. 1-4). This statement would lead readers to assume the project will reduce vehicle queues and delays. Further, there are many objectives listed, however the following all reflect improvements in traffic congestion as part of this project:

> Recognizing the needs and fundamental purposes of the proposed project, it would be intended to achieve the following project objectives:
>
> - Reduce overall vehicle delays through improved motor vehicle mobility on the State Highway system, including for commercial access and a better resident and visitor experience;
> - Improve traffic safety, traffic operations, and emergency access on SR 89 and SR 28, which includes the river crossing (Fanny Bridge) and associated intersections;…
> - Improve connectivity, reliability, travel times and operations of public transportation modes, including increased mobility and safety for bicycles and pedestrians and more multi-use trail options for crossing Truckee River, including maintaining and/or improving access to the Caltrans maintenance yard;…
> - Make public transportation more effective with better visibility, connectivity, reliability, and travel times;
> - Comply with TRPA regional level of service (LOS) criteria;…
> - Enhance community attraction for existing and future economic activity by resolving mobility and safety issues in the Fanny Bridge area;…" (DEIR/S/EA, p. 1-5).

However, even without having considered the induced travel, generated traffic, and full suite of cumulative impacts of regional developments, the DEIR/S/EA itself concludes that the LOS of all but one of the evaluated roadway segment operations for Alt. 1 will be the same as the No Action Alternative (in 2018 and 2038). For one segment (southbound travel between western and eastern roundabouts), LOS will actually be worse than the comparable segment in the existing alignment (southbound from Fanny Bridge to Granlibakken) in the No Action alternative.

> [2018]:
> Exhibit 4.15-5 shows the study area volumes associated with Alternative 1 in 2018. As shown in Table 4.15-6, the roadway segments are projected to operate at acceptable LOS during both peak hours with existing capacity configurations (i.e., as shown for Alternative 5, the No Action Alternative). Both the SR 89 segment between Twin Crags Way and the new SR 89/28 intersection and the new SR 28 segment between this intersection and the existing wye are projected to operate at the same LOS in both directions as under the No Action Alternative. The relocated SR 89 segment (between the western

> and eastern roundabouts) is projected to operate at the same LOS in the northbound direction toward SR 28 during both peak hours as compared to the existing alignment under the No Action Alternative (between the existing wye and Granlibakken Road). Along this same segment between the western and eastern roundabouts, the southbound projected travel speed and associated LOS is lower during the summer peak hour than the No Action Alternative. The operations at the eastern roundabout could contribute to the projected average speed reduction. The projected LOS for the existing segment of SR 89 between the wye and Granlibakken Road is the same for Alternative 1 as under the No Action Alternative. Thus, because LOS segment operations would remain at acceptable levels, implementation of Alternative 1 would result in a less-than-significant impact.
>
> [2038]:
> Exhibit 4.15-11 shows the study area volumes associated with Alternative 1 in 2038. As shown in Table 4.15-7, the roadway segments are projected to operate at acceptable LOS during both peak hours with existing capacity configurations (i.e., as shown for Alternative 5, the No Action Alternative). Both the SR 89 segment between Twin Crags Way and the new SR 89/28 intersection and the new SR 28 segment between this intersection and the existing wye are projected to operate at the same LOS in both directions as under the No Action Alternative. The relocated SR 89 segment (between the western and eastern roundabouts) is projected to operate at the same LOS in the northbound direction toward SR 28 during both peak hours as compared to the existing alignment under the No Action Alternative (between the existing wye and Granlibakken Road). Along this same segment between the western and eastern roundabouts, the southbound projected travel speed and associated LOS is lower during the summer peak hour than the No Action Alternative. The operations at the eastern roundabout could contribute to the projected average speed reduction. The projected LOS for the existing segment of SR 89 between the wye and Granlibakken Road is the same for Alternative 1 as under the No Action Alternative. Thus, because LOS segment operations would remain at acceptable levels, implementation of Alternative 1 would result in a less-than significant impact.

In addition, Tables 4.15-6 and 4.15-7, *Roadway Segment Traffic Operations for All Alternatives*, list the 2018 and 2038 (resp.) LOS for traveling southbound on the roadway segment "New SR 89- between new SR 89/28 intersection (Western Roundabout for Alternatives 1,2,3 or signal for Alt. 4) & New SR 89/existing SR 89 intersection (Eastern Roundabout for Alts 1,2,3 or Granlibakken Rd for Alt 4)" as D and E, resp. Existing peak LOS for the comparable roadway segment in both forecast years under the No Action Alternative is C. These results indicate that Alt. 1 would, in fact, result in worse LOS conditions than the No Action Alternative.

The conclusions for Alternatives 6 and 6A state the 2018 LOS segment operations will be the same as under the No Action alternative (DEIR/S/EA, p. 4.15-27), and the 2038 LOS segment operations will be the same as the No Action Alternative, and will be worse for the summertime peak hour in the eastbound direction on the segment between Twin Crags Way and the existing Wye intersection (p. 4.15-32).

While the impacts may be deemed less than significant per TRPA and Caltrans criteria, the alternatives do not meet the need, purpose, and stated objectives regarding *improving* traffic delays and LOS in the project area.

In summary, even failing to account for the project-related increases from induced travel, generated traffic, pedestrian activity in the project area, driver behavior, pedestrian traffic in Tahoe City, and evaluating all cumulative impacts,[12] the DEIR/S/EA itself has concluded that

[12] Detailed comments related to these inadequacies are included in our 2/17/2015 Comments on the DEIR/S/EA.

the Action Alternatives will *worsen* LOS compared to the No Action alternative – contrary to the stated need, purpose, and objective of the project.

This needs to be clarified, and an amended project description, purpose, and need statement must be recirculated as part of a new scoping process.

Scenic Impacts:

We appreciate the additional information provided by TTD and TRPA staff, and consultants, at the 2/26 TTD workshop. The visual images and simulations help the public to visualize what the project may look like. However, there were several viewpoints that were not represented in the visuals. For example, there were no ground (eye-level) visuals of what the new bridge may look like to someone along the riverbank, or from the existing road or bike trail. It is difficult to see the elevated grade, or even the size and scale, of the new bridge from the images provided. Most people will see the new bridge from ground level, not from the raised viewpoint in the simulated photos and videos.

There were no visuals of what the bypass may look like as it crosses the 64-acre Tract. We have also requested more information regarding how much of the bypass will be elevated as it crosses the 64-acre Tract; we were finally told by one of the project consultants at the workshop that it would come back down to ground elevation about half-way through the forested tract. There is still a need to clearly examine and disclose to the public the visual impacts of the bypass throughout the 64-acre Tract.


SR 89/FANNY BRIDGE COMMUNITY REVITALIZATION PROJECT
SIMULATION Alternative 6a

Traffic Volume estimates:

We compared the Year 2018 and Year 2038 Traffic Volumes for the No Action Alternative and Alternatives 1 and 6/6A.

No Action vs. Alt. 1:

According to the graphics from Appendix G (beginning on the next page), the summer peak month average daily traffic volumes in 2018 for noted intersections under the No Action Alternative would be:

- SR 89 N - 17,000;
- Fanny Bridge – 22,900.

For Alternative 1, 2018 volumes would be:

- SR 89 N – 17,000;
- Fanny Bridge – 9,200;
- Eastern Roundabout on SR 89 S – 22,900;

Therefore, there will be an additional 9,200 vehicles on the roadway in the project area during the peak summertime month. However for the No Action Alternative, and Alternatives 6/6A, the volumes remain the same. The same situation exists for 2038, where there are an additional 10,000 vehicles. This is clearly a substantial increase in vehicle trips on the roadways during the peak summer month with Alternative 1 and must be explained in the DEIR/S/EA. This also conflicts with statements in the DEIR/S/EA that the bypass will not result in increased traffic volumes.

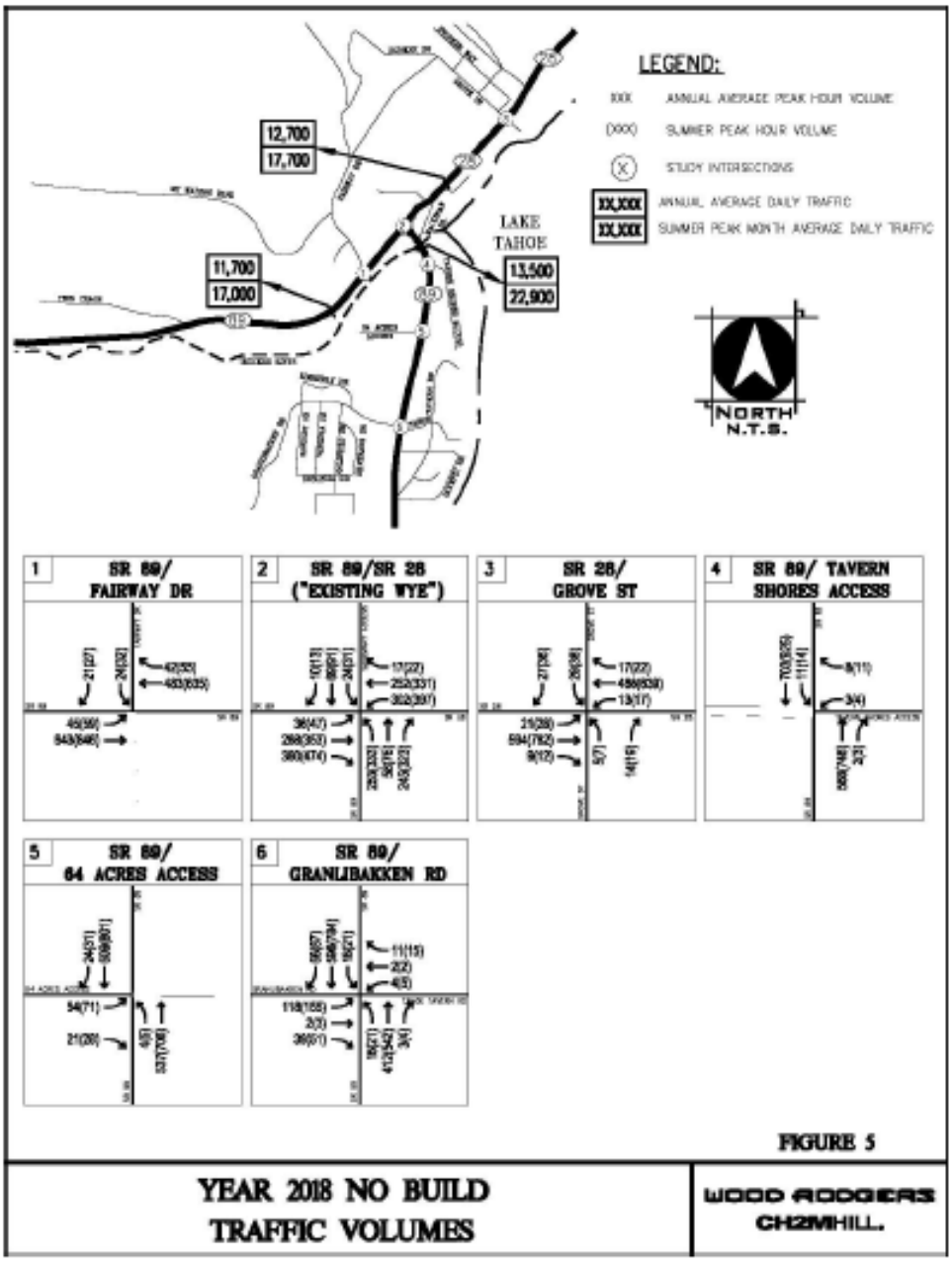


FIGURE 5

YEAR 2018 NO BUILD TRAFFIC VOLUMES

WOOD RODGERS CH2MHILL.

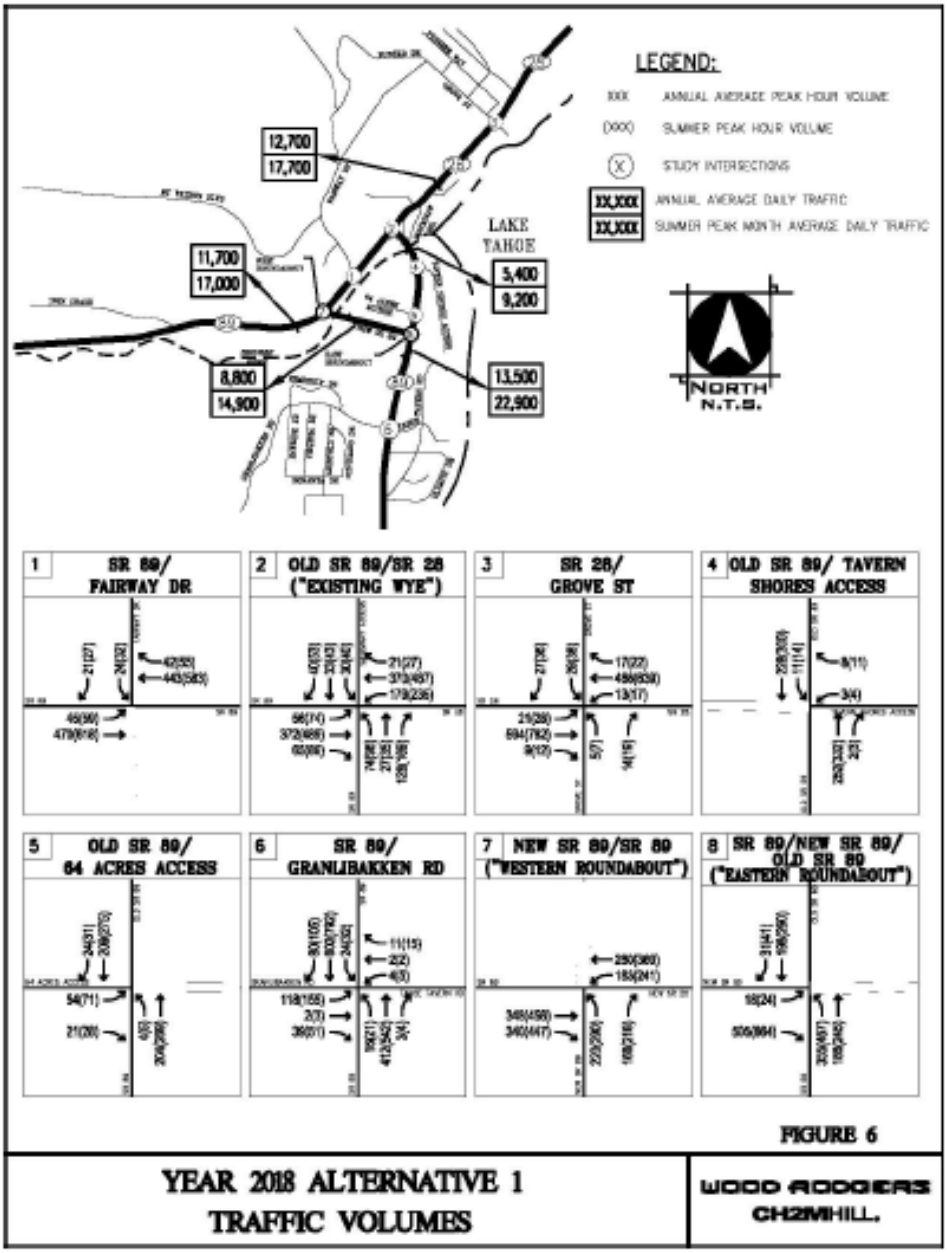


FIGURE 6

YEAR 2018 ALTERNATIVE 1
TRAFFIC VOLUMES

WOOD RODGERS
CH2MHILL

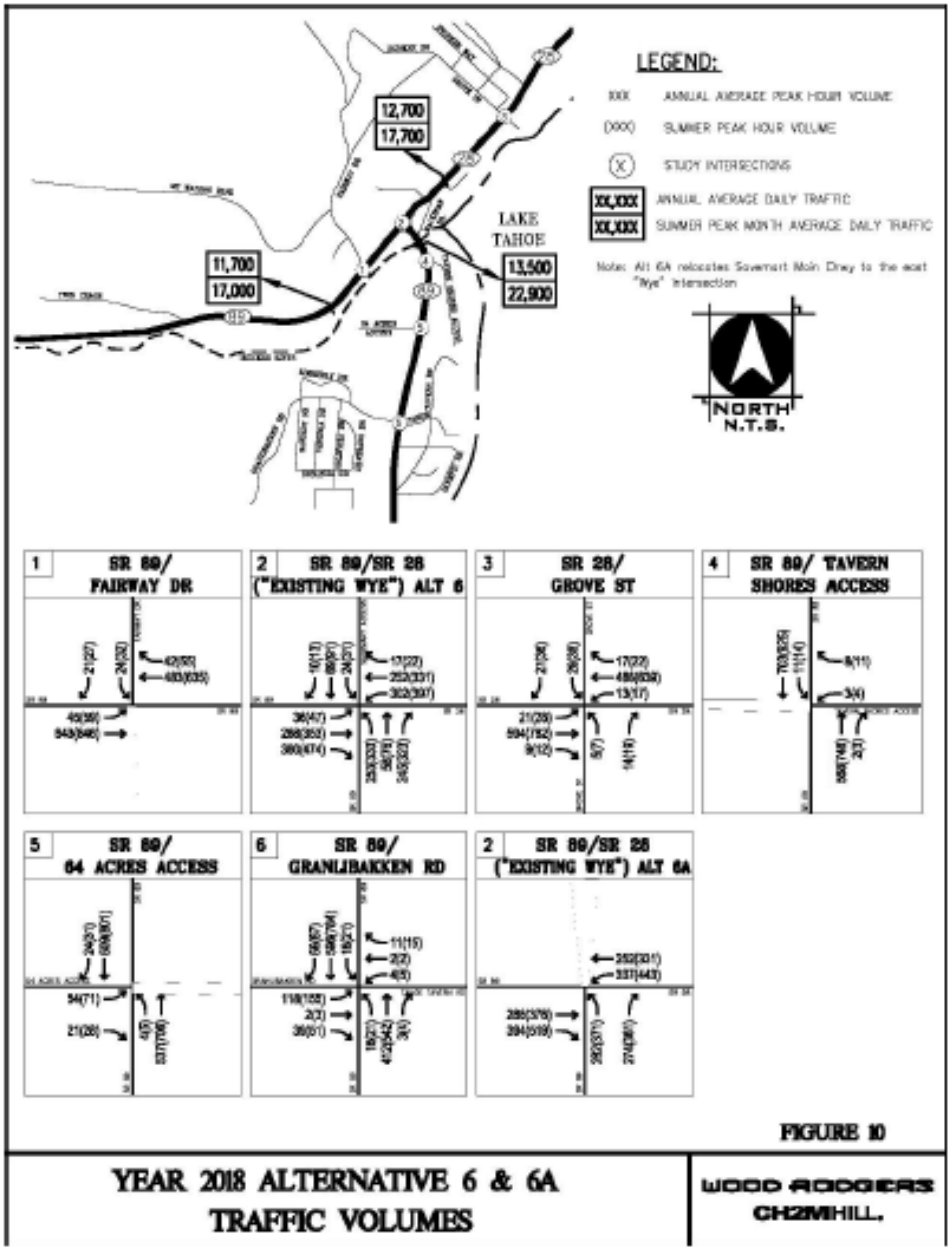


FIGURE 10

YEAR 2018 ALTERNATIVE 6 & 6A TRAFFIC VOLUMES

WOOD RODGERS CH2MHILL

Other Questions:

On p. 4.15-15, the DEIR/S/EA states that traffic from the 64-Acre Recreation Tract Intermodal Center was not included because "this project was constructed and volumes in/out of the development project were captured in the 2013 traffic counts." However, we have heard the Transit Center has been operating at much less than capacity. The traffic counts must assess the vehicle trips to and from the Transit Center based on its capacity (maximum use).

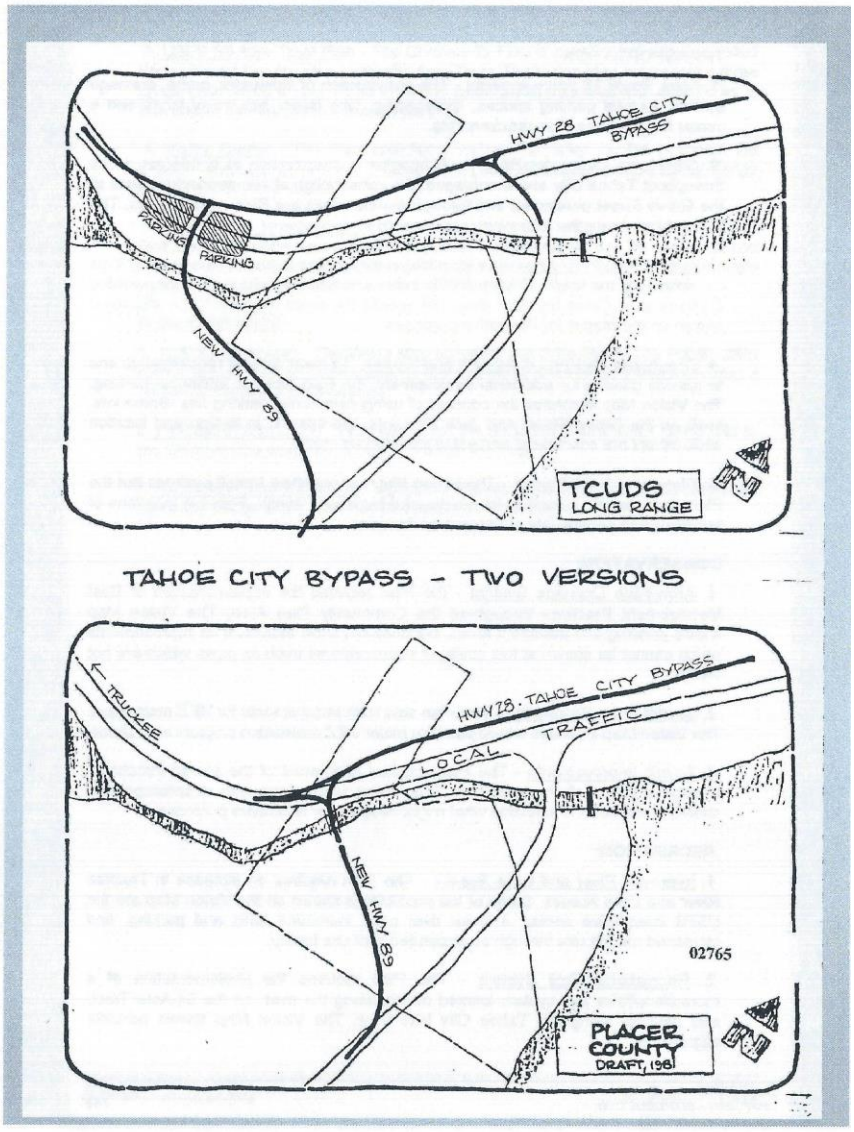
On p. 4.15-36, the DEIR/S/EA states "The shaded cells indicate that the projected LOS is worse than the No Action Alternatives, which is a significant impact." However, in the previous impact discussion, the text discussion (and data in Tables 4.15-6 and -7) show roadway segment LOS is also worse than the No Action Alternative, however this is not considered a significant impact. The FEIR/S/EA needs to clarify this discrepancy.

On p. 4.15-42, the document states "This simplified analysis does not account for induced demand that may result if motorists choose to travel during the peak hours once the project is implemented. However, it can be logically assumed that these trips are occurring sometime during the day other than the peak hour, so the VMT in the study area likely would not change as a result of project implementation." However, agency or consultant speculation cannot be substituted for factual evidence. Obtaining information to assess the possible induced travel does not seem burdensome, especially for a project of this size, scale, impact, and cost. For example, this information could be assessed through actions such as objective surveys of drivers, residents, and visitors. In addition, as noted in our 2/17 comments, available evidence from Caltrans and other studies indicate increased roadway capacity results in induced travel and generated traffic. Therefore, in the absence of any data to suggest otherwise, the DEIR/S/EA has no basis on which to assert there will be no increases in trips.

Reasonably foreseeable impacts for Tahoe City:

This project will not solve congestion related to Tahoe City pedestrian use, although the transportation study has stated this is part of the problem in the area. However, the action alternatives will substantially increase the capacity of the highway in this area.

That improvements in Tahoe City are already needed to improve flow in the project area is not only documented in the DEIR/S/EA, but represented by the upcoming workshop related to mobility improvements in Tahoe City (flyer below). However, during the 2/25/2015 TRPA Governing Board Meeting, the Executive Director of the TTD stated the following to the Board: "[You] will hear this [project] doesn't address problems in Tahoe City…if you really want to solve that…you need to do a Tahoe City bypass." This statement correlated with a powerpoint slide show, which included an old sketch of a Tahoe City bypass.



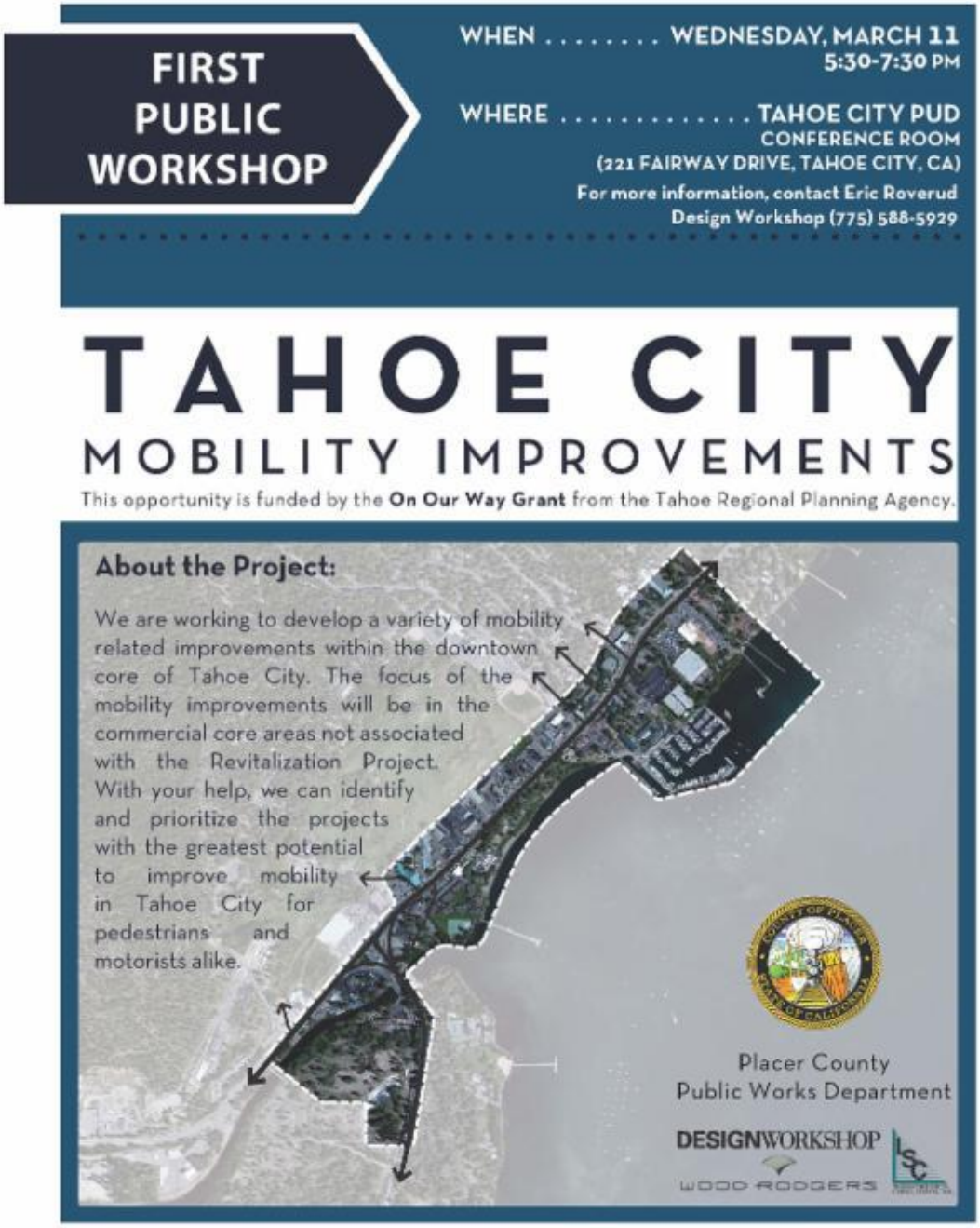
No one is discussing a bypass around Tahoe City again – yet. Many might say such a thing would never be considered. However, the logic behind the support for the Fanny Bridge bypass project has relied heavily on its listing in historical documents.[13] What has not been considered **is whether this project is now appropriate given existing conditions and understanding of transportation systems**. Yet claiming the need for the project because it was on the books decades ago would be like claiming the need for the bypass around Tahoe City because that was also contemplated decades ago. We suspect Tahoe City would opt to consider other options carefully.

On that note, the cumulative impacts of this project, which the DEIR/S/EA notes includes worsened LOS conditions in the future compared to the No Action alternative, in addition to increased development associated with other regional and local projects (e.g. Squaw

[13] According to the TTD Director while presenting images of historical documents, this project "*has long been contemplated*." 2/25/2015 GB Hearing.

Valley, Alpine Meadows, Tahoe Basin Area Plan, etc.) will mean more traffic in Tahoe City. It is not unreasonable to question whether a Tahoe City bypass project will be proposed in the future to "improve flow and support walkability."

The DEIR/S/EA must carefully examine the potential cumulative and reasonably foreseeable impacts of this project. In this case, as Alternatives 1-4 and 6/6A will create more congestion, the DEIR/S/EA must assess the impacts this will have on Tahoe City. How will this be addressed? Will another bypass be contemplated in the future? What alternative ways will Tahoe City address increased traffic and congestion in the future?



Conclusion:

In conclusion, there are feasible (and less costly) alternatives to address two of the top three long-standing needs for the project:

1. Improve pedestrian safety/etc.: Widening of Fanny Bridge, including physical barriers between vehicle lanes and pedestrian sidewalks, directing pedestrians interested in viewing the fish to a cantilever structure over the river, and other options are available to improve pedestrian safety and infrastructure.
2. Seismic rehabilitation of Fanny Bridge: As noted by Caltrans, the bridge could be repaired for approximately $400,000 to meet seismic standards.
3. The third long-standing stated need – reducing traffic congestion and improving flow – is not met by any of the Action Alternatives.
    a. As noted, the DEIR/S/EA finds that all action alternatives will result in *worse* LOS (more congestion) at one or more intersections or segments compared to the No Action alternative.

FOWS requests the alternatives proposed by Jim Sajdak (included in his NOP comments and recent comments on the record), and others including the Tahoe Area Sierra Club and League to Save Lake Tahoe (as proposed in NOP comments), be fully evaluated whereby the existing Fanny Bridge is widened to a lesser extent than Alt. 6/6A, and alternative options for improved pedestrian access are taken (e.g. a cantilever for viewing fish). It is also clear the purpose and need for the project must be reconsidered in light of the failure of any action alternatives to reduce roadway congestion. It appears the true objectives may be focused on pedestrian improvements and supporting a new "Fanny Bridge District" to supplement desired resort/hotel developments in Tahoe City. This needs to be carefully considered and clarified to the public.

We also request the larger Tahoe City/Fanny Bridge Area be examined together to assess the existing pedestrian infrastructure, connections, and impacts throughout the entire area. As the activities in these areas directly impact each other, we recommend this be done *before* any large scale "transportation" or other projects are implemented.

The DEIR/S/EA contains significant gaps in data, lacks substantial evidence to support many impact conclusions, includes conflicts between the project need and purpose and the outcomes of the project, and draws numerous impact conclusions based on speculation and narrative. Correcting these flaws will introduce significant new information to the public. For this reason, a new EIR/S/EA should be circulated with the appropriate information so the public will have ample opportunity to comment on a sufficient analysis and disclosure of the impacts.

Attachments: 2/25 EIP Slides from TRPA Staff Presentation to Governing Board

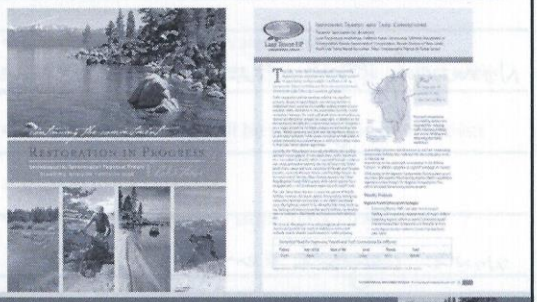
Environmental Improvement Program

- The EIP is a strategy to help achieve environmental thresholds
- Launched EIP after 1997 Lake Tahoe Presidential Forum
- SR89/Fanny Bridge Community Revitalization Project is a high priority transportation and trail connectivity EIP project

Water Quality and Soil Conservation

- Project area drainage
- Threshold Indicators
- Water Quality BMPs
- Coverage and Mitigation
- Stream Environment Zone (SEZ)
- Roadway maintenance practices

Environmental Improvement Program Update



Scenic Resources

- Three Scenic Roadway Travel Units
- Update all highway fixtures to blend
- Complete streets features
- Design features for bridge rails and lights
- Public art and vegetation in roundabouts
- Vegetative screening required

TRPA Threshold Categories

- Water Quality CWQ, Sewer Line
- Soil Conservation 23K
- Scenic Resources
- Recreation
- Air Quality
- Noise
- Vegetation
- Fish Habitat
- Wildlife Habitat

Recreation

- All bike and hiking trail connections will remain
- Access to the Truckee River will remain the same or improve
- Pedestrian and bicycle facilities will increase with bike lanes along the roadways and complete sidewalk connections
- Pedestrian crossings will improve
- Access to public lands

Air Quality

- Is directly related to Transportation
- Less reliance on private automobile by enhancing pedestrian and bicycle facilities, and creating connectivity
- Increases operation efficiency of public and private transit
- No alternative will increase VMT and Alternatives 1 through 4 decrease VMT
- Does not affect other indicators like ozone, carbon monoxide or odors

Fish and Wildlife Habitat

- No work is proposed for the Truckee River channel, except for removal of Fanny Bridge mid-river columns
- Any effects would be minor and temporary
- All fisheries threshold indicators will not be affected
- Special interest wildlife species will not be affected
- Habitats of special significance indicator will not be affected

Noise

- Community Noise Equivalency Level
- Noise will not increase as a result of the project with mitigation
- Part of noise source will be relocated in alternatives 1 through 4
- Speeds will be slower
- Roundabouts have less stop-and-go traffic

Questions and Comments?

Vegetation

- No threshold indicators are affected
- No uncommon plant communities occur in the project area
- No sensitive TRPA special-interest plants occur in the project area
- The project area is not located in a late seral/old growth forest

Selected Slides from TTD presentation to GB:

SR 89/Fanny Bridge Community Revitalization Project

The Purpose and Need is:

- Safety
  - RPU, Fed and State Trans
- Improving Transit and Trails Connections
  - EIP, AQ, GHG, Rec
- Congestion Improvement
  - VMT, AQ, GHG
- Complete Streets Improvement
  - WQ, Scenic, RPU, EIP

What Does It Take To Deliver a Public Project?

To Date:

- More than five years of project process
- Over 40 Project Delivery Team meetings
- Over $3 million in project costs
- Over 30 public workshops and meetings
- Community Review Committee
- Ten public hearings and Board meetings
- Extraordinary collaborative relationships (legacy of EIP implementation)
- $33 million for construction costs

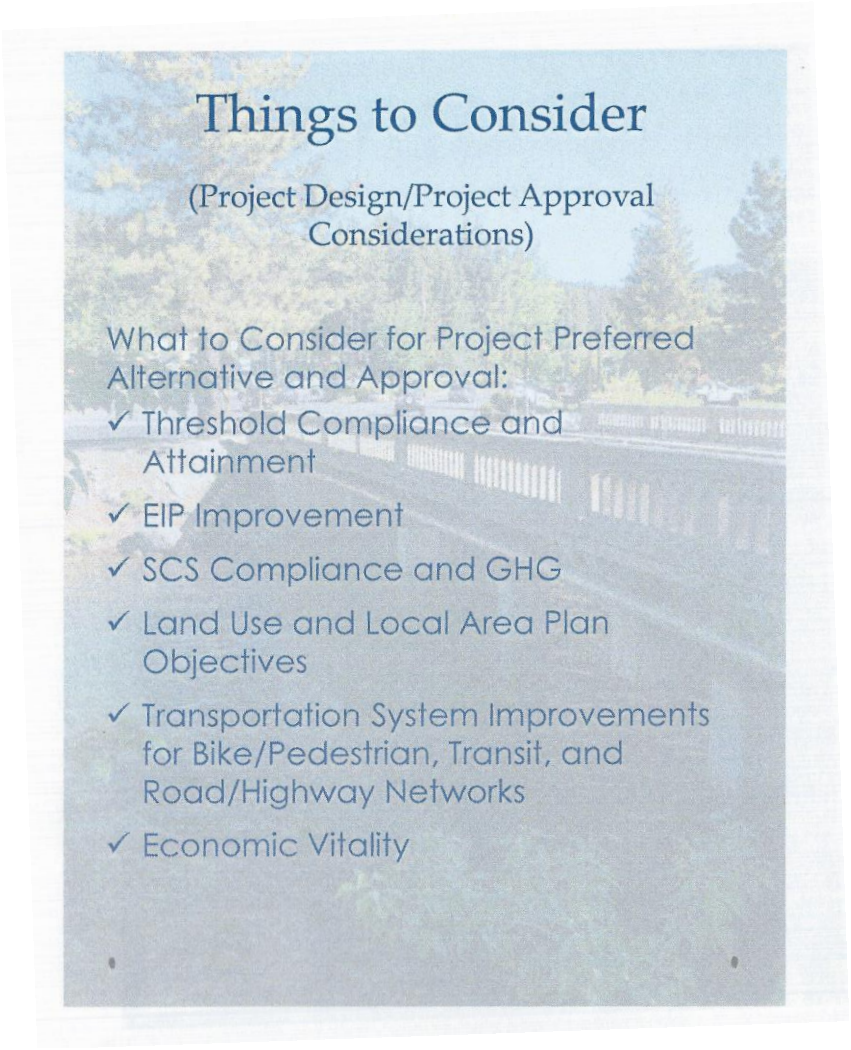
Proposed Action Benefits

- Safety (RPU, Fed and State Trans, AQ)
  - Two points of ingress and egress for the west shore
  - Fewer bike/pedestrian conflicts with vehicles
- Congestion Improvement (VMT, AQ, GHG)
  - Relieve to west shore queuing
- Complete Street Implementation (VMT, AQ, GHG)
  - Old alignment becomes local for transit and commercial end of Tahoe City enhancing historic and pedestrian environment
- Water Quality Improvement (WQ)
  - TMDL BMP Improvements
  - Replace Sewer Main Collector
- Infrastructure Upgrade
  - Two new long lived bridges out of the flood plain, aesthetically designed to fit community
- Bike Trail along the River (Rec)
- Catalyst for Economic Development at North End of Tahoe City (RPU G&P)
- Operational Improvement for Traffic, Transit, and Goods Movement (RPU G&P)

New Truckee River Bridge

Roundabout at Wye
with Alt 1

Alternative 6a with No
Realignment


Things to Consider
(Project Design/Project Approval Considerations)
What to Consider for Project Preferred Alternative and Approval:
✓ Threshold Compliance and Attainment
✓ EIP Improvement
✓ SCS Compliance and GHG
✓ Land Use and Local Area Plan Objectives
✓ Transportation System Improvements for Bike/Pedestrian, Transit, and Road/Highway Networks
✓ Economic Vitality

FRIENDS OF THE WEST SHORE
• Protecting Our Watersheds • Wildlife • Rural Quality of Life

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

February 23, 2015

Subject: Comments on State Route 89/Fanny Bridge Community Revitalization Project

Dear Chair Beyer and Members of the Governing Board:

Thank you for the opportunity to comment on the workshop and informational briefing for the State Route 89/Fanny Bridge Community Revitalization Project (Fanny Bridge Project). We also appreciate the board's interest in asking staff to explain the environmental benefits of the proposed project. However, as reflected in our attached comments, the draft EIR/EIS/EA contains numerous significant technical flaws in its analysis of multiple environmental impacts. Further, the environmental documentation does not support the claim of environmental benefits from the bypass (Alt. 1-4), and downplays the impacts that are noted.

The general objectives for this project have long focused on three key items: 1) improving congestion at the Tahoe City Wye/S.R. 89 intersection; 2) improving pedestrian facilities/access; and 3) ensuring Fanny Bridge meets seismic requirements. Although a long list of other objectives have emerged in the DEIR/S/EA, a historic review of this project since its inception decades ago reveals these three issues. However, the proposed bypass will *increase traffic and congestion* because it will add capacity to the highway. Our comments include numerous references to this effect. There are other feasible options to improve pedestrian facilities and meet the seismic requirements (which also notably cost taxpayers millions less). In fact, two of them are included in the DEIR/S/EA (Alternatives 6 and 6A widen the existing Fanny Bridge). With regard to emergency situations, the bypass will still be connected to two-lane highways.

Finally, it should be made very clear that the bypass will be elevated up to ten feet above ground level, and is estimated to be 80-100 feet wide. The scenic impacts alone are substantial. However, this will cover over 23,000 sq. ft. in a Stream Environment Zone (Land Capability 1b) – contrary to the RPU's call to *reduce* coverage in SEZs. The elevated bypass will also bisect a popular recreation area that most users currently walk to. The EIR/S/EA includes no applicable surveys of recreationalists, including how many would opt to drive to other areas to recreate if a bypass intrudes into this area (creating more vehicle trips). The project will also create more noise (and in new areas), air and water pollution, require the removal of many healthy trees, disturb wildlife habitat, and impede night sky. Additionally, the bypass will require the rerouting of a major sewer line, which poses numerous risks.

We ask the Board to request the extensive deficiencies in the draft EIR/S/EA be addressed and a new draft document re-circulated for public review. Further, the need for the bypass project should be reassessed given existing conditions, current science and transportation information, the available (and feasible) alternatives, and the impacts the bypass alternatives will have on TRPA's environmental thresholds.

Sincerely,

Susan Gearhart,
President,
Friends of the West Shore

Jennifer Quashnick
Conservation Consultant
Friends of the West Shore

Attachments: FOWS Comments on the Draft EIR/S/EA for Fanny Bridge (2/17/2015)

Tahoe Regional Planning Agency
Attn: Mr. Brian Judge
PO Box 5310
Stateline, NV 89449

February 17, 2015

Tahoe Transportation District
Attn: Mr. Alfred Knotts
PO Box 499
Zephyr Cove, NV 89448

Subject: Comments on State Route 89/Fanny Bridge Community Revitalization Project

Dear Mr. Judge and Mr. Knotts:

Thank you for the opportunity to comment on the draft EIR/EIS/EA for the State Route 89/Fanny Bridge Community Revitalization Project (Fanny Bridge Project). The Friends of the West Shore (FOWS) works towards the preservation, protection, and conservation of the West Shore, our watersheds, wildlife, and rural quality of life, for today and future generations. Unfortunately, the EIR/EIS/EA contains numerous significant technical flaws in its analysis of multiple environmental impacts. New evaluations, data collection, and surveys are needed throughout, to such an extent that a revised draft EIR/EIS/EA (with recirculation and a 60-day public comment period) is needed in order to provide adequate public disclosure and analysis of the impacts of the project alternatives. In addition, although one of the key goals of the Fanny Bridge project has, for decades, been focused on reducing congestion at the Tahoe City Wye and on SR 89, the draft EIR/EIS/EA outright dismisses the most recent information regarding the traffic impacts of increased highway capacity – namely, the increase in Vehicle Miles Traveled (VMT) and vehicle trips and the lack of long-term improvements in congestion levels. In essence, the proposed bypass (Alternatives 1-4) will increase roadway capacity, leading to more of the transportation-related problems the originators of the Fanny Bridge project aimed to solve decades ago (and the reason for which the Environmental Improvement Program lists this project).

Further, the environmental documentation provides no information to support any environmental benefits from this project. Where impacts are acknowledged, the draft EIR/EIS/EA tends to dismiss them through various exemptions (e.g. coverage), speculations (i.e. recreation impacts), lack of information (e.g. scenic), and other methods. In addition, given the significant impacts from the project, we believe NEPA requirements dictate a full EIS be done to meet federal requirements. Impacts include, but are not limited to:

- Increased vehicle trips, congestion, vehicle miles traveled (VMT), and VMT per capita from the increased highway capacity;
- Increased air pollution and greenhouse gas (GHG) emissions associated with the additional VMT and vehicle trips;
- Increased water pollution in Lake Tahoe's nearshore area, where algal growth is already high;
- Water quality impacts from the increased coverage, the disturbance related to elevating the road, and impacts to the Truckee River from additional vehicle emissions and spills;
- Loss of soil and increased water pollution and runoff from increases in coverage by the new bypass (including 0.53 acres of coverage on SEZ lands) and disturbance on the River's banks;

- Scenic impacts from the elevation of the western roundabout by ten feet, the new elevated highway across the Truckee River, and the physical intrusion of the bypass across the forested 64-acre Tract;
- Substantial impacts to recreation users of the 64-acre Tract;
- Noise impacts to humans and wildlife from more cars, higher speeds, the new location of the roadway, and elevation of the roadway,
- Vegetation and forest impacts to the area from disturbing the land across the now forested area of the 64-acre Tract, including the removal of trees greater than 30" dbh;
- Wildlife impacts from the destruction of existing habitat, the additional noise and activity created by the proposed project, and the fragmentation that would occur through realignment;
- Potential impacts resulting from releases of hazardous waste associated with the relocation of the Truckee River Interceptor line; and
- The cumulative impacts to traffic, air and water quality, noise, scenic resources, and other environmental resources impacted by the proposed bypass plus reasonably foreseeable projects.

The current draft EIR/EIS/EA fails to adequately evaluate and disclose numerous environmental impacts to thresholds and to multiple resource areas as required by the TRPA Code of Ordinances (section 3.7),[1] NEPA (1500.1),[2] and CEQA (15125, 15126.2).[3] Correcting these deficiencies will require substantial new analyses, data collection, and other assessments. Therefore, this DEIR/EIS/EA should be set aside and time taken gather the appropriate data, perform sufficient analyses of impacts, and correctly disclose this information to the public for review and consideration in a revised draft EIR/EIS/EA. Such information is also needed by the decision-makers responsible for protecting the environment of Lake Tahoe, a National Treasure. Actions which must be taken and information gathered include, but are not limited to:

- The EIR/EIS/EA must use a consistent project description for all impact sections;

[1] http://www.trpa.org/wp-content/uploads/TRPA-Final-Code-Adopted-by-Governing-Board-7_23_2014-amended_notracking.pdf

[2] Sec. 1500.1 Purpose. …(b) NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail;
https://ceq.doe.gov/nepa/regs/ceq/1500.htm#1500.1

[3] § 15126.2. Consideration and Discussion of Significant Environmental Impacts.
An EIR shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services. [Emphasis added]
https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=IB4809520D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=%28sc.Default%29

- Clear and visual information is needed to clarify where the bypass will be located and how much it will be elevated for the entire realigned section;
- Re-assess the need for the bypass project as it relates to:
  - Traffic congestion, since the project will increase vehicle trips and VMT, and the bypass will be attached to 2-lane highways on all sides;
  - The potential harm to TRPA's environmental thresholds (see findings required by TRPA's Code[4]);
  - Costs and potential harm from relocating the sewer line;
  - Benefits versus costs when compared to other options for improving pedestrian facilities and repairing the bridge;
  - Funding needs and benefits with regards to improving public transit versus constructing new roads (in fact, the TTD recently stated the need for more transit funding[5]);
- Analyze the impacts of the pedestrian activity and driver behavior on each alternative;
- After an updated transportation analysis has been completed, the impacts to air quality, GHGs, noise, water quality, soil conservation (coverage), vegetation, wildlife habitat, recreation, and scenic resources must be re-examined;
- Complete a revised scenic analysis which includes before and after images of all points of scenic interest, including identified scenic viewpoints, Key Observation Points (KOPs), and any areas on the Lake where the bypass (including headlights at night) may be seen;
- Perform recreation surveys to assess baseline usage and to gather data upon which to evaluate impacts to user experience;
- Perform sufficient noise monitoring (not just modeling) in areas that will be affected; and
- Reassess the cumulative impacts of the project.

Our detailed comments are attached. We herein incorporate comments submitted by the Tahoe Area Sierra Club. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President,
Friends of the West Shore

Jennifer Quashnick
Conservation Consultant
Friends of the West Shore

Cc: Matt Ambroziak, Central Federal Lands Highway Division

Attachments:

Lake Tahoe Basin Bike Trail Survey, July 2007. Tahoe Coalition of Recreation Providers.
Excerpts from TMPO Regional Transportation Plan, 2008/Mobility 2030
FOWS Request for Extension of Public Comment Period for DEIR/EIS/EA & TTD Response
Fanny Bridge Inspection Report: 6/9/2014

[4] Code of Ordinances, Section 4.4.1.B: To approve any project TRPA shall find, in accordance with Sections 4.2 and 4.3, that: …The project will not cause the environmental threshold carrying capacities to be exceeded;"

[5] http://www.laketahoenews.net/2015/02/tahoe-making-case-for-federal-transit-dollars/

I. Purpose and Need:

The proposed action:

The NOA states: "*This EIR/EIS/EA does not make a recommendation regarding the approval or denial of the project. The analysis included in this EIR/EIS/EA is informational in its purpose and will be used by the TTD, TRPA, and FHWA-CFLHD to render decisions regarding approval of project elements within their jurisdiction and selection of an alternative. It will also be used by other agencies with approval authority over some aspect of project implementation, such as the United States Forest Service (USFS), California Department of Transportation (Caltrans), and Placer County*." (p. 1-2). Additionally, responses during the 1/14/2015 APC hearing for this item indicated no preferred alternative. However, we note the DEIR/EIS/EA states that: "*Alternative 1: New Alignment – Existing SR 89 Open to Local Traffic is considered by the lead agencies to be the 'proposed action.'"* (p. 3-1).

However, it has been verbally stated that there is no preferred alternative. The agencies should very clearly disclose, including verbally, what they consider the proposed alternative. Throughout our comments, we refer to the bypass alternatives (1-4) as the "Proposed Project/alternative" and "proposed bypass."

Historic versus stated purpose and need:

The original stated need for this project, decades ago, was based on reducing traffic congestion, and improving pedestrian facilities. In fact, the current EIP list includes the following project description:

> The project addresses severe traffic congestion during the peak summer and winter periods. The project also addresses existing structural deficiencies required for seismic retrofit within the next ten years. Fanny Bridge will be upgraded to improve pedestrian and bicycle safety and access. Traffic congestion will be addressed with a wider Fanny Bridge and/or a new State Route 89 realignment through the 64-acre USFS parcel located west of the existing State Route 89. (EIP 5-Year Priority Project List (January 1, 2012 through December 31, 2016). http://www.trpa.org/wp-content/uploads/EIP_5-Year_List-2012_through_20162.pdf

The purpose of the project has for years been focused on the following three issues: bridge retrofits, traffic congestion, and pedestrian/bicyclist safety. On this note, Caltrans has already documented that seismic retrofits can be completed for roughly $400,000 – a fraction of the $20-30 million bill to taxpayers estimated for the bypass.[6] Second, as noted in our transportation comments, ample evidence now shows that adding highway capacity does not reduce long-term congestion. Third, pedestrian/bicyclists access improvements can be made to the existing bridge (for example, Alt. 6a or other alternatives suggested by the public which rehabilitate the existing bridge); a bypass is

[6] California Department of Transportation Division of Maintenance: ***Structure Maintenance and Investigations.*** Bridge Inspection Records Information System. Inspection Date: 6/9/2014.

not necessary to improve public safety on Fanny Bridge. The DEIR/EIS/EA concludes that all action alternatives improve pedestrian safety.[7]

In sum, it appears the items under the "Purpose and Need" have been expanded to go far beyond the actual purpose and need associated with the project when it was first envisioned. However, the DEIR/EIS/EA promotes the project as having been planned 'for decades.' If the purpose and need no longer reflect the core purpose of the original project concept (including seismic upgrades, pedestrian access improvements, and congestion relief), the eligibility for federal transportation funding is questionable, especially in light of the far less expensive alternatives that will achieve the original stated goals, and not create more traffic and environmental impacts.

The Project Purpose and Need must be revised to reflect the true purpose and need for the project in light of the most current transportation information and alternative options available to implement pedestrian improvements (for example, options involving minor widening of Fanny Bridge for pedestrians, and repairs for structural improvements).

Project Description:

As noted in our detailed comments below, the description of the proposed bypass is inconsistent and unclear. As a result, assessing the impacts of the project on resources, including scenic quality, is not possible.

Each alternative needs to include a consistent project description throughout the EIR/EIS/EA. This description should clearly identify and provide visuals regarding where the bypass will be located and at what elevation. The environmental study of the impacts of each alternative requires a consistent project description for each impact section and analysis.

Reason for inclusion in RTP/SCS:

The DEIR/EIS/EA frequently refers to the inclusion of this project in the RTP/SCS adopted in 2012. As noted in our comments below, the RTP did not analyze the environmental impacts of this project, nor did it reevaluate the appropriateness of the project given existing conditions and information about roadway capacity improvements. Not only are VMT and daily trip reductions questionable from this project (and unlikely in the long run as noted below), but no environmental improvements are identified for this project (other than the claimed transportation benefits, which affect the air quality, GHGs, and other impact assessments). In fact, the RTP notes the reason this project (listed as a "constrained project" in the RTP) was included was simply due to the likelihood of funding:

[7] **Impact 4.15-5. Traffic and pedestrian safety impacts.** Alternatives 1 through 4 would realign SR 89, which would result in construction of a new SR 89/28 intersection and improvements to the existing wye. A comparison of the safety-related features for these alternatives suggests they would result in beneficial impacts under Alternatives 1, 2, 3, 4, 6, and 6a. Because the existing wye would remain in the same location with no improvements under Alternative 5, there would be no impact associated with this alternative. (DEIR/EIS/EA, p. 4.15-45).

> As described in Chapter 2, RTP/SCS Alternatives, transportation projects, programs, and operational actions of the RTP have been assembled into three distinct sets of transportation strategies (identified as Transportation Strategy Packages A, B, and C) based on relative certainty of implementation in the near-, medium-, or longterm, and based on whether funding is considered reliable (see Appendix C for detailed information). Projects on the financially "constrained" project list are those that can be funded with reasonably foreseeable revenues from a combination of federal funds (i.e., Congestion Mitigation and Air Quality Program, Federal Lands Highway Program), California and Nevada state funds (i.e., State Transit Assistance and Local Transportation Fund, Nevada State Funds, California State Highway Operation and Protection Program), and local revenue (i.e., transit farebox revenues, hotel occupancy taxes, Regional Surface Transportation Program funds). "Unconstrained" projects are those that could be implemented only if additional funding is available in either the short or long term. Transportation Strategy Packages and their application to Regional Plan Update alternatives are described as follows:…[Emphasis added] (2012 RTP EIR/EIS, p. 3.3-30).[8]

In other words, the listing in the 2012 RTP is not based on providing any environmental improvements, and in fact recognizes the potential degradation of scenic quality from the bypass.[9] Further, as explained in detail below, the 2008 RTP actually identified the *increases* in VMT and daily vehicle trips, and GHGs, from this project – which is consistent with current information about the impacts of capacity-increasing projects. The RTP also includes no analysis of the impacts of the proposed bypass, and as a result, there is nothing upon which to base any conclusions about environmental benefits from the project. This lack of evidence is carried forward by the numerous deficiencies in the environmental analysis noted herein.

The EIR/EIS/EA must evaluate the proposed project based solely on the environmental benefits and impacts of each alternative, without regard or reference to the 2012 RTP list of projects. The evaluation must analyze and disclose the transportation impacts using the most current information regarding roadway capacity increases; including VMT, VMT per capita, and daily and peak vehicle trips.

[8] http://tahoempo.org/Mobility2035/#eir

[9] In urban areas, new transportation facilities are expected to enhance, rather than degrade, the scenic quality. For example, the State Route 89/Fanny Bridge Community Revitalization Project (included in all alternatives) would include landscape improvements in the vicinity of the North Tahoe "Wye," which could enhance scenic quality. This project could also result in the construction of a new bridge over the Truckee River, which would add a new visual element to the river corridor landscape (a potential degradation of scenic quality). Projects that include "complete streets" (such as the Sierra Boulevard Complete Streets Project from US 50 to Barbara Avenue) would also involve changes to views; however, these changes could be considered beneficial, as they would likely enhance the existing pedestrian and bicycle viewer experiences through the addition of new landscape elements, sidewalks, benches and lighting resulting in improvements to the roadway character and threshold standard indicator for Travel Route Ratings. [Emphasis added] (RTP/SCS EIR/S, p. 3.9-20).

II. Reasonable Set of Alternatives/Dismissed Alternatives:

As noted in NOP comments from the LTSLT and TASC, "An alternative should be examined and a traffic model run on a scenario in which the bridge crossing is two lanes with a middle turning/emergency lane instead of the proposed 4-lanes." Tahoe City residents and other commenters on the NOP also requested other alternatives. However, the EIR/EIS/EA hastily dismisses an alternative which would rehabilitate Fanny Bridge, improve pedestrian access, and not create the increases in roadway capacity that result in more traffic, more air pollution, more noise, and other negative impacts:

> **Rehabilitate or Replace and Widen the Existing Fanny Bridge, Provide Barriers Separating Vehicles and Pedestrians.**
> This alternative would rehabilitate or replace the existing Fanny Bridge and widen it by approximately 14 feet in the downstream direction. The widening would accommodate a new shared bicycle/pedestrian sidewalk on the downstream side of the bridge, and separate the sidewalks on both sides of the bridge from traffic lanes with reinforced concrete barrier rails to provide a safe pedestrian environment.
>
> This alternative was eliminated from consideration because it did not meet some of the basic objectives of the project including the Purpose and Need, and would not eliminate pedestrian crossings south of Fanny Bridge, and would not construct any features to improve level of service or air quality, improve safety and improve access, or provide for a "gateway experience." (DEIR/EIS/EA, p. 3-31)

As a result, feasible alternatives have been dismissed from further review.

The Project Purpose and Need must be based on the purpose and need originally envisioned for this project, and a revised DEIR/EIS/EA with alternatives reflecting the original purpose and need must be analyzed.

The EIR/EIS/EA must also evaluate alternatives to reduce the widening of the bridge, and/or accommodate pedestrian improvements through means other than a 39-60 foot increase in width proposed in Alternatives 6 and 6A. Comments provided by Tahoe City resident Jim Sajdak on the NOP and during the draft EIR/EIS/EA period have described alternative options and we reference those herein.

III. Transportation and related impacts

Oddly, the DEIR/EIS/EA has concluded that the project would not generate increases in daily trips or VMT[10]:

> Because the project involves improvements to existing transportation infrastructure, no new daily trips are anticipated to occur as a result of implementation of the proposed project. Thus, the generation of new DVTE would not occur with project implementation and this topic is not discussed further in the EIR/EIS/EA. (p. 4.15-17) [Emphasis added]

> …None of the alternatives, however, would generate traffic or result in increased regional traffic volumes traveling through the study area or elsewhere in the Region, because traffic volumes are determined by regional travel demand, local and regional land uses, and residential and visitor populations. For this reason, the action alternatives would not contribute to this cumulative condition, so no cumulative impact would occur. (p. 5-20) [Emphasis added]

Meanwhile, the DEIR/EIS/EA claims VMT 'benefits' from changes in the route.[11] However, without addressing the increased trips that will be induced and generated by the project, this analysis is fatally flawed.

The DEIR/EIS/EA also concludes that traffic flow will improve in the area,[12] which fails to account for the many studies showing that the reduction in congestion is temporary, and traffic eventually works its way back up to the previous levels of congestion. Further, impacts on intersection operations[13] were not analyzed because of the same incorrect assertion (that the project will not increase trips).

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[10] **Impact 4.15-3. Vehicle miles of travel.** VMT is a measure of the efficiency of the transportation system and the degree to which the land use pattern would reduce personal motor vehicle travel. When VMT increases, it results in indirect environmental impacts (such as air pollutant emissions). VMT would decrease a small amount for Alternatives 1 through 4 as a result of the realignment of SR 89. For Alternatives 1, 2, 3, and 4, reduced VMT would result in a small beneficial impact. For Alternatives 5, 6, and 6a, the existing roadway alignment would remain the same; thus, no change to existing VMT would occur and there would be no impact. (DEIR/EIS/EA, p. 4.15-42)

[11] **Impact 4.15-3. Vehicle miles of travel.** VMT is a measure of the efficiency of the transportation system and the degree to which the land use pattern would reduce personal motor vehicle travel. When VMT increases, it results in indirect environmental impacts (such as air pollutant emissions). VMT would decrease a small amount for Alternatives 1 through 4 as a result of the realignment of SR 89. For Alternatives 1, 2, 3, and 4, reduced VMT would result in a small beneficial impact. For Alternatives 5, 6, and 6a, the existing roadway alignment would remain the same; thus, no change to existing VMT would occur and there would be no impact. (DEIR/EIS/EA, p. 4.15-42)

[12] **Impact 4.15-6. Mobility and operations-related impacts.**
A second bridge across the Truckee River would improve travel flow and efficiency for all transportation modes in the study area. Two river crossings that would spread the vehicular, pedestrian, and bicycle volumes across multiple locations would reduce congestion and the potential for conflict among travel modes. Implementation of Alternatives 1, 2, 3, and 4 would result in a beneficial impact. Because a second river crossing is not provided under Alternatives 5, 6, and 6a, there would be no impacts with these alternatives. (DEIR/EIS/EA p. 4.15-47)

[13] **Impact 4.15-2. Intersection operations.** The project would not generate additional vehicle trips that could affect intersection operations; rather, it would implement improvements to existing transportation infrastructure. (DEIR/EIS/EA, p. 4.15-36)

Rather, evidence suggests that such projects will lead to increased trips through "induced travel" and "traffic generation:"[14]

> A project that changes user travel costs (money or time) on a particular street, road, or transit route will motivate the following changes in traveler behavior:
>
> - **Changes in route**: Users change their route from other facilities to an improved facility.
> - **Changes in mode**: Users of other modes change their mode to take advantage of an improved facility.
> - **Changes in time of travel**: Users change their time of travel to a more desired time due to the decrease in congestion.
> - **Generation of new trips**: Users choose to make trips they previously would not have made, because travel costs are lower.
>
> This is called *generated traffic*, referring to additional vehicle traffic on a particular road. This consists in part of *induced travel*, which refers to increased total vehicle miles travel (VMT) compared with what would otherwise occur (Litman 2001).
>
> This additional vehicle travel tends to increase external costs (downstream congestion, parking subsidies, accident risk, pollution emissions) and provide additional user benefits, although these benefits tend to be small since it consists of the marginal-value vehicle travel that consumers most willingly forego when their time or vehicle operating costs increase slightly.
>
> Virtually any roadway project that increases vehicle travel speeds or reduces travel costs can induce vehicle travel, including roadway expansion and traffic signal synchronization (Noland and Quddus 2006; TRISP 2005). On congested urban roadways with significant latent demand, a major portion of additional roadway capacity tends to be filled with generated traffic and induced travel within a few years (Gorham 2009). On the other hand, congestion pricing and improvements to alternative modes (such as high quality, grade-separated public transit that parallels a highway) can reduce traffic congestion without inducing additional vehicle travel. [Emphasis added]

Notably, "external costs" referenced in this report would be incurred by the West Shore. Further, reports by Caltrans' own reviews document the need for Caltrans to understand that increasing capacity will induce travel:

> "Induced demand fills up roads as fast as they're built…"
>
> *- Caltrans Research Connection, 2004*[15]
>
> "…*Changing the culture.* Beyond the mission, vision, and goals, a modernized Caltrans will require capacities and skills that now are lacking: to understand and manage demand (including demand induced by new transportation facilities…" [Emphasis added]
>
> *- Caltrans, Jan. 2014*[16]

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[14] http://bca.transportationeconomics.org/benefits/induced-travel; Also, "Induced demand fills up roads as fast as they're built…" Caltrans Research Connection, 2004: http://r.search.yahoo.com/_ylt=A0LEViWMma1UL.EAusgPxQt.;_ylu=X3oDMTBybnV2cXQwBHNlYwNzcgRwb3MDMgRjb2xvA2JmMQR2dGlkAw--/RV=2/RE=1420691980/RO=10/RU=http%3a%2f%2fwww.dot.ca.gov%2fresearchconn%2fpast_speakers%2fDrCrane%2fcrane_caltrans_9-04.ppt/RK=0/RS=xYABXn0UpTUZOiM3YY2jKqiA6kw-;

[15] http://r.search.yahoo.com/_ylt=A0LEViWMma1UL.EAusgPxQt.;_ylu=X3oDMTBybnV2cXQwBHNlYwNzcgRwb3MDMgRjb2xvA2JmMQR2dGlkAw--/RV=2/RE=1420691980/RO=10/RU=http%3a%2f%2fwww.dot.ca.gov%2fresearchconn%2fpast_speakers%2fDrCrane%2fcrane_caltrans_9-04.ppt/RK=0/RS=xYABXn0UpTUZOiM3YY2jKqiA6kw-

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

> "The results strongly support the hypothesis that added lane mileage can induce significant additional travel." - *Noland, 2001*[17]

> "When road capacity is increased, total travel time will ultimately equalize over time, until traffic moves at the previous levels of congestion." – *Campaign for Sensible Transportation*[18]

> "Traffic congestion tends to maintain equilibrium. Congestion reaches a point at which it constrains further growth in peak-period trips. If road capacity increases, the number of peak-period trips also increases until congestion again limits further traffic growth. The additional travel is called "generated traffic." Generated traffic consists of diverted traffic (trips shifted in time, route and destination), and induced vehicle travel (shifts from other modes, longer trips and new vehicle trips). Research indicates that generated traffic often fills a significant portion of capacity added to congested urban road…" – *Littman, 2014*[19]

> "The new alignment could change traffic patterns at the Tahoe City area. At the present time, many residents and visitors plan their trips to avoid the congestion associated with Fanny Bridge. If the traffic queues on SR 89 were reduced, then there would be more flexibility for making vehicle trips in the Tahoe City area during peak summer hours. It should be noted that some interests are opposed to any improvement to the conditions that exist on SR 89 because it could result in inducing additional vehicle trips to the Tahoe Basin…There is also the potential that any of the alternatives could result in cumulative impacts that are currently unknown. In addition, because the alternatives are intended to reduce the existing congestion at Fanny Bridge, there is a possibility that they could result in growth inducement. Further investigations of these issues is also warranted." - *Project Study Report, March 2002*

In fact, the TMPO's own Regional Transportation Plan (2008)[20] estimated the increase in VMT and vehicle trips from this project (excerpt below). This conflicts with the claim in the current DEIR/EIS/EA that the project will not increase vehicle trips or VMT.

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[16] "The California Department of Transportation: SSTI Assessment and Recommendations: State Smart Transportation Initiative January 2014; http://r.search.yahoo.com/_ylt=A0LEViWMma1UL.EAu8gPxQt.;_ylu=X3oDMTByODJtaWUzBHNlYwNzcgRwb3MDMwRjb2xvA2JmMQR2dGlkAw--/RV=2/RE=1420691980/RO=10/RU=http%3a%2f%2fwww.calsta.ca.gov%2fres%2fdocs%2fpdfs%2f2013%2fSSTI_Independent%2520Caltrans%2520Review%25201.28.14.pdf/RK=0/RS=R_FtXKwCadcL.ktzpaiG6r9k3iM-

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

[18] http://www.sensibletransportation.org/induced/

[19] Todd Litman. "Generated Traffic and Induced Travel." Implications for Transportation Planning. 2014. *Victoria Transport Policy Institute*; http://r.search.yahoo.com/_ylt=A0LEViWMma1UL.EAx8gPxQt.;_ylu=X3oDMTBzajE3bzE3BHNlYwNzcgRwb3MDMTAEY29sbwNiZjEEdnRpZAM-/RV=2/RE=1420691980/RO=10/RU=http%3a%2f%2fvtpi.org%2fgentraf.pdf/RK=0/RS=qbIrb4IiN5XiCl2oKmTgu5OIPmI-

[20] Aka "Mobility 2030 - Lake Tahoe's Regional Transportation Plan Update." From: http://www.tahoempo.org/rtp.aspx?SelectedIndex=1

It proposes to reduce the existing U.S. Highway 50 alignment to two eastbound lanes with westbound traffic redirected on Lake Parkway.

State Route 89 Realignment

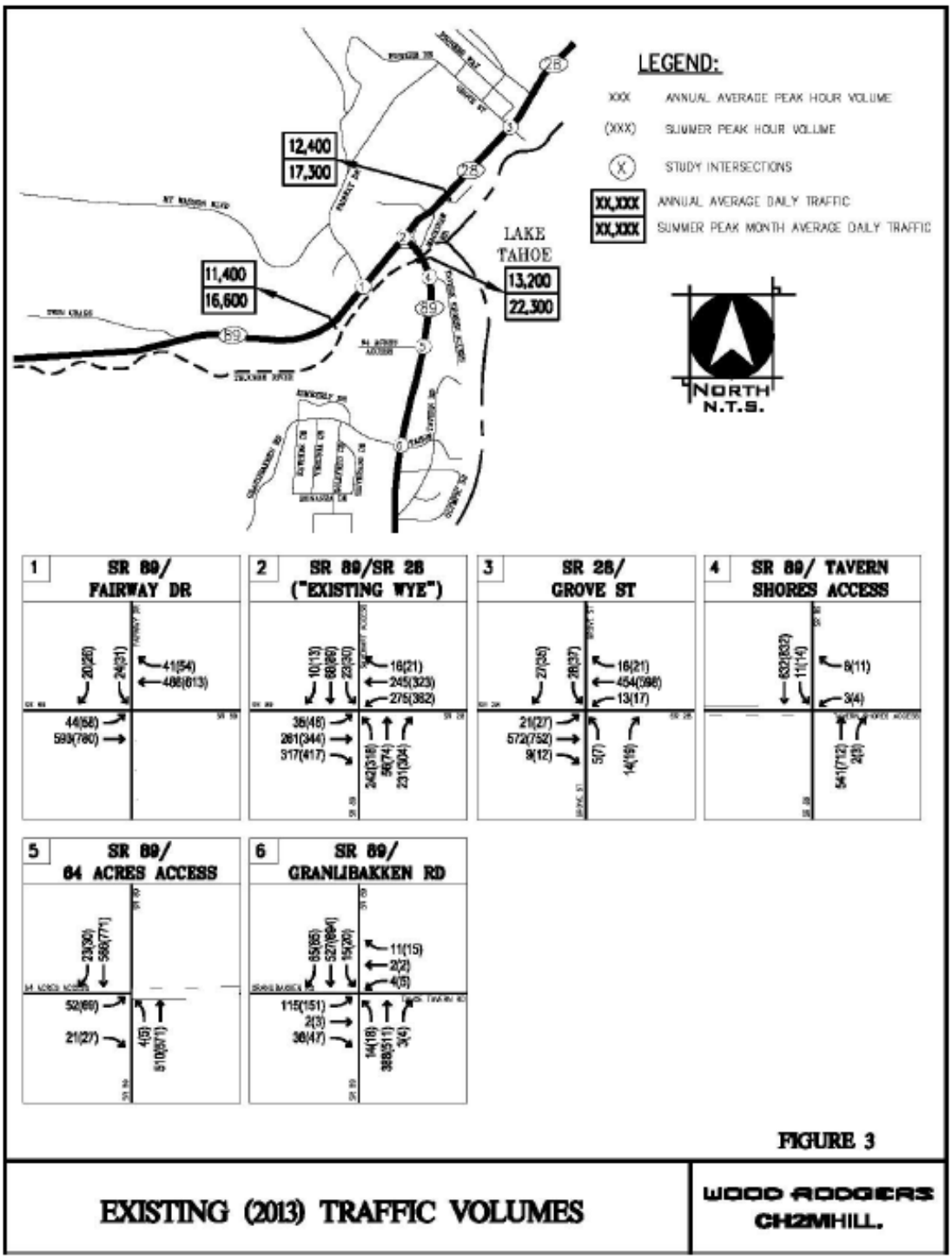
Also scheduled for completion after 2022, this project addresses seasonal traffic congestion at the Tahoe City "Wye" in Placer County and the structural and seismic deficiencies of the Fanny Bridge over the Lower Truckee River. Fanny Bridge will be upgraded to provide improved pedestrian and bicycle safety with a new State Route 89 alignment through the 64-acre USFS (U.S. Forest Service) parcel located west of the existing SR 89.

Based on the results of the TransCAD modeling and street network analysis, the resulting increase in daily VMT and vehicle trips from the two non-exempt projects have been estimated at 15,530 and 2,283 respectfully for the forecast year of 2030. In order to identify the county's (El Dorado and Placer) VMT and vehicle trip change contribution as inputs to the on-road source emission estimates created by the two projects, the TMPO staff utilized the TransCAD model to identify El Dorado and Placer VMT and vehicle trip changes for the 2030 forecast year. Based on the results of this analysis the El Dorado and Placer County increases in VMT and vehicle trips were computed as follows for the 2030 forecast year:

El Dorado County 2030 Forecast	Placer County 2030 Forecast
VMT +10,861	VMT +4,669
Vehicle Trips +1,553	Vehicle Trips +730

Figure 6.4

This graphic provides estimates for each county; note the Placer County increases are attributable to the Fanny Bridge Realignment Project. The estimated increased vehicle trips are noted as the 'daily vehicle trips.' Although the estimates to peak hour are not included, it is noteworthy that 730 trips/day is roughly double the general range in summer peak hour trips and more than double the general annual average peak hour trips, as noted in Figure 3 from Appendix G, the Travel Forecast and Operations Analysis Technical Memorandum:



Although the average trips per day and average peak trips per day are different units, the addition of 730 trips could be highly significant in light of the existing peak numbers.

The EIR/EIS/EA must clarify the discrepancy between the 2008 estimated increases and the DEIR/EIS/EA statements that contradict them.

FHWA assumptions do not apply:

Although FHWA documents may suggest minimal changes from realignments,[21] the reasoning behind their conclusion is not applicable to the project area. The FHWA suggests that existing trips have simply been moved to back roads, thus with capacity increases on the highway, those drivers may move their travel back onto the highway, creating very little 'increase' from the capacity expansion. However, as there was no alternative route to crossing Fanny Bridge, there were no other routes available for drivers to rely on to avoid congestion. Chances are, as capacity increases, travelers who have simply avoided trips will now take them, increasing the number of trips and VMT in the area.

The final EIR/EIS/EA must analyze and disclose the true potential increase in daily trips, by day and peak hour, as well as daily trips during peak hours for all affected intersections.

Regarding the VMT, the RTP/SCS EIR/EIS did not specifically list, nor evaluate, the increased VMT associated with this project. Therefore, tiering from its mere "listing" in the programmatic EIR/EIS for those documents does not suffice, nor relieve the agencies of the responsibility to examine and disclose the impacts of the increased VMT from this project, both on a regional and local scale.

The final EIR/EIS/EA must analyze and disclose the potential increase in total VMT, locally and regionally.

Impacts related to regional increases in visitors and residents on the West Shore:

Further, the proposed bypass will make it more encouraging for visitors traveling from North Tahoe, Squaw Valley, Alpine Meadows, Truckee, and other areas to drive south on SR 89 along the West Shore. The popularity of Emerald Bay is a well-known visitor attraction.

The final EIR/EIS/EA must analyze and disclose the potential increase in traffic along the West Shore from the project plus the cumulative impacts of regional developments.

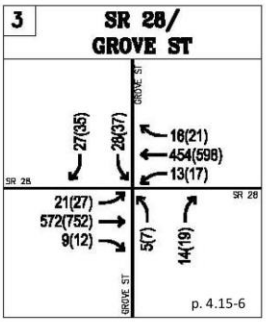
Congestion from Grove Street Intersection

During a recent public meeting in Tahoe City (February 11), local residents and business owners stated that the congestion through Tahoe City and affecting the SR 89/28

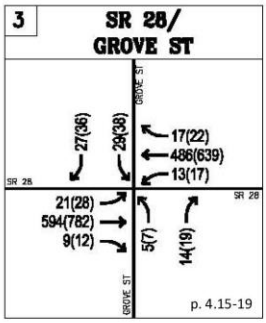
[21] "In metropolitan areas, highway facilities are usually built or widened where existing traffic congestion has already decreased travel speeds during certain times of the day. To avoid the congestion, some travelers may have diverted to alternative routes, changed the time they make their trips, switched to different travel modes, traveled to other destinations, or decided not to make a particular trip at all. The new or widened highway facility can carry significantly more traffic before it becomes congested. Many travelers who previously took other routes or traveled at other times may switch to the new facility to take advantage of decreased travel times. The increase in traffic on the new facility resulting from these changes is largely offset by reductions in traffic along parallel routes and at other times of the day. The net effect on region-wide daily vehicle miles of travel (VMT) resulting from these travel behavior changes is minimal" [Emphasis added]. http://www.fhwa.dot.gov/planning/itfaq.cfm

intersection was heavily associated with the Grove Street intersection and pedestrian crosswalk. The traffic analysis in Appendix G also refers to the impacts of the pedestrian crossing at Grove Street: "*During the summer peak hour conditions, factors such as pedestrian/bicyclist activity at/near Fanny Bridge and Grove Street, additional traffic volume, and drivers unfamiliar with the area play a role in reducing the capacity of the study roadway segments."* [Emphasis added] (p. 2). Although the EIR/EIS/EA includes a forecast of vehicle counts and turns for the Grove Street intersection, there is no analysis regarding the interactions with pedestrian traffic. In fact, according to the vehicle numbers alone, in each forecast year (2018 and 2038) Alternatives 1, 6a, and 5 all show the same number of vehicles in all directions at this intersection. In other words, the EIR/EIS/EA forecasts no increase or decrease in traffic at this intersection from the proposed project. For ease of reference, images for each have been compiled below.

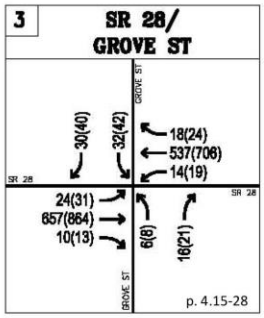
Existing Conditions 2013



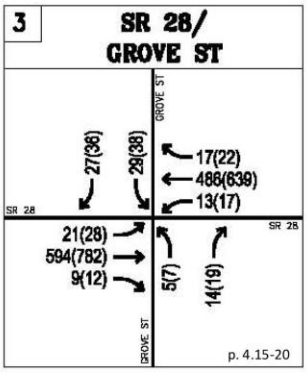
Year 2018 – No Build



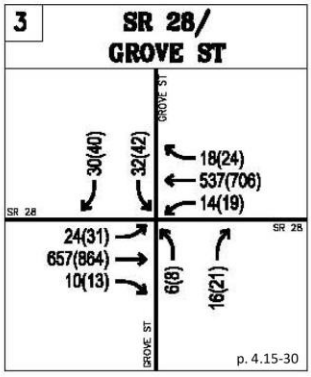
Year 2038 – No Build



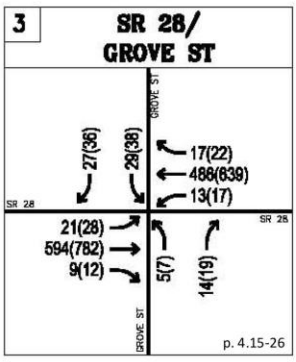
Year 2018 – Alt. 1



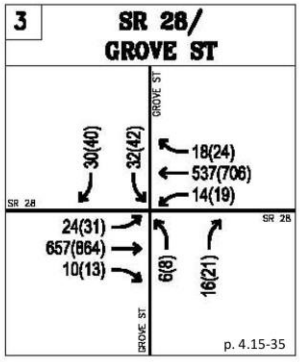
Year 2038 – Alt. 1



Year 2018 - Alt. 6/6a



Year 2038 – Alt. 6/6a



The final EIR/EIS/EA must clearly assess the pedestrian and vehicle impacts at intersections in the Tahoe City area, including the cumulative impacts of each alternative and the increases in traffic from surrounding and foreseeable developments.

In addition, once a sufficient transportation analysis has been performed, then the impacts to air quality, GHGs, noise, water quality, soil conservation (coverage), vegetation, wildlife habitat, recreation, and scenic resources must be re-examined in light of the new information.

Impacts from pedestrian activities and driver behaviors

Throughout the DEIR/EIS/EA, it is noted that pedestrian activity plays a major role in the congestion experienced near/on the Fanny Bridge. In fact, the traffic study (Appendix G) explains that pedestrian and bicyclist activity at/near Fanny Bridge and Grove Street, and driver behavior, play a role in reducing the capacity of the roadway segments:

> **Existing study area congestion.** The Field Conditions section discusses the traffic flow issues associated with the summer tourist and recreational season in the study area. During the summer peak hour conditions, factors such as pedestrian/bicyclist activity at/near Fanny Bridge and Grove Street, additional traffic volume, and drivers unfamiliar with the area play a role in reducing the capacity of the study roadway segments. Extremely long vehicular queues result at signalized locations, especially on northbound SR 89 and westbound SR 28. Since the queuing is not effectively discharged in every cycle or even within a single peak hour, the un-serviced queues tend to extend through multiple peak hour periods. (Appendix G, p. 2).

However, the modeling performed for the analysis does not adequately account for the impacts of driver-based and human behaviors without extensive calibration - which was not performed.

> It is important to note that the arterial progression evaluation completed in this traffic analysis (using Synchro/SimTraffic 8 software) assumes/models random traffic arrival/discharge patterns occurring within the peak hour, and not the actual field-observed saturated traffic arrival/discharge conditions resulting from "un-serviced" residual queues from the prior peak hours. Furthermore, it should also be noted that without an extensive calibration effort, this analysis tool does not adequately account for all of the driver-based field behaviors and human factors previously discussed. Therefore, the observed queuing and congestion in the Tahoe City area is worse than the analysis results indicate in this study. For instance, high levels of pedestrian activity at/near Fanny Bridge and at Grove Street along with driving behavior of out-of-town vacationers typically exacerbate the duration of long queues on the northbound SR 89 and westbound SR 28 approaches to Tahoe City during the peak summer season.
>
> The Synchro/SimTraffic software is an industry standard tool for analysis of intersection and roadway operations, respectively. Synchro and SimTraffic are intended to be used as companion models. Synchro is used to first determine macro level LOS and delays at intersections, and then SimTraffic is used to simulate real world conditions. While Synchro looks at individual intersections independently without the impact of queuing or blocking from downstream intersections, SimTraffic measures the full impacts of queuing and blocking by individually tracking each vehicle in the roadway system and collecting comprehensive measures of effectiveness for them at 0.1-second intervals during the simulation. For the purposes of this

> arterial roadway segment analysis, the following steps were undertaken to reduce variability in results:
> • Multiple simulation runs (five) were averaged to account for different arrival/discharge patterns.
> • The default SimTraffic seed and recording times of 3 and 10 minutes were increased to 10 and 60 minutes, respectively, for generating more reliable results.
>
> However, a calibration to match real-world conditions was not performed as part of this analysis. Calibrating simulation models is a time-intensive effort that involves multiple data collection efforts across all modes of travel. For instance, the pedestrian/bicyclist activity at the Fanny Bridge signal crossing and other mid-block pedestrian crossings on eastbound SR 28 between the existing wye and Grove Street would have to be counted and entered as model inputs into the SimTraffic microscopic analysis tool. After a re-run with these parameters, observed field conditions would then need to be compared with the model outputs to verify the calibration of the model. These steps would be repeated until the results match real-world operating conditions. Microscopic models like SimTraffic are resource intensive. [Emphasis added] (Appendix G, p. 15)

If, as the EIR/EIS/EA notes, pedestrian activity and human behaviors are causing the capacity of the existing roadway system to be lower (thereby increasing congestion and delays), then the EIR/EIS/EA must examine how each alternative will impact these activities and behaviors (and how these interactions will impact traffic congestion). In essence, the current analyses of the impacts of each alternative fail to carefully examine and disclose how the very causes of the congestion will continue to affect each alternative. For example, if no changes are made to improve the Grove Street intersection (which is confirmed by the graphs indicating no difference between the No Build and Alternatives 1 and 6A), then it is likely that pedestrian crossing at this intersection will continue to impact nearby roadways. However, this impact does not appear to be considered in the traffic analysis. In another example, how will driver behaviors affect traffic with regards to the new bypass? Will people find the two intersections more confusing? How will each alternative improve (or not improve) the impacts from drivers unfamiliar with the area?

Given the direct tie between congestion in the project area and pedestrian/bicyclist activity and human behavior, the EIR/EIS/EA must account for the impacts of these activities on the projected traffic impacts of each alternative. This must include calibration of models to ensure they reflect real-world conditions accurately.

IV. Localized impacts of VMT on Tahoe's Nearshore:

Our comments address the regional impacts elsewhere, however, as noted extensively in our comments to TRPA on the RPU,[22] and in subsequent legal documents,[23] the RPU/RTP failed to address the localized impacts of development to Tahoe's nearshore areas. There are currently five thresholds related to Tahoe's nearshore:[24]

> *Nitrogen Loading: (numerical)*
> Reduce dissolved inorganic nitrogen (N) loading from all sources by 25% of 1973-81 annual average
>
> *Pollutant Loading: (numerical)*
> Reduce the loading of dissolved inorganic nitrogen, dissolved phosphorus, iron, and other algal nutrients from all sources to meet the 1967-71 mean values for phytoplankton primary productivity and periphyton biomass in the littoral zone.
>
> *Sediment Loading: (numerical)*
> Decrease sediment load as required to attain turbidity values not to exceed three NTU. In addition, turbidity shall not exceed one NTU in shallow waters of the Lake not directly influenced by stream discharges
>
> *Pollutant Loading: (management)*
> Reduced dissolved inorganic nitrogen loads from surface runoff by approximately 50 percent, from groundwater approximately 30 percent, and from atmospheric sources approximately 20 percent of the 1973-81 annual average. This threshold relies on predicted reductions in pollutant loadings from out-of-basin sources as part of the total pollutant loading reduction necessary to attain environmental standards, even though the Agency has no direct control over out-of-basin sources. The cooperation of the states of California and Nevada will be required to control sources of air pollution which contribute nitrogen loadings to the Lake Tahoe Region.
>
> *Attached Algae*
> MANAGEMENT STANDARD
>
> Implement policy and management actions to reduce the areal extent and density of periphyton (attached) algae from Lake Tahoe's nearshore

As a result, as required by the TRPA Compact the EIR/EIS/EA must examine the impacts of the project on all thresholds, including these nearshore indicators. With regards to VMT impacts, the annual average basinwide VMT does not provide the necessary information to analyze the impacts of localized increases in VMT on Tahoe's nearshore. For example, what are the water and air impacts associated with the additional 4,669

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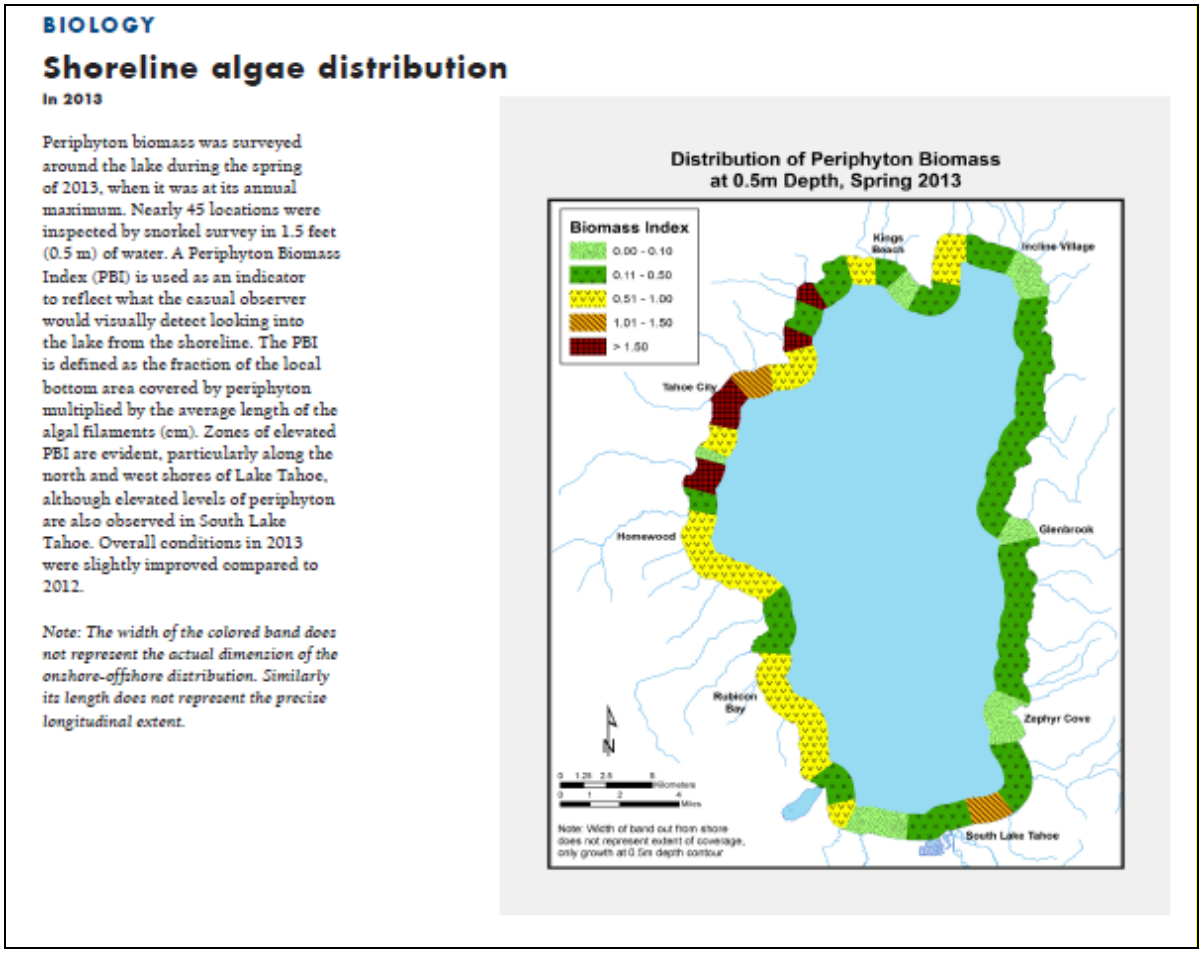
[22] http://www.trpa.org/documents/reisc/2_Other%20Organizations/League%20to%20Save%20Lake%20Tahoe,%20Friends%20Of%20West%20Shore,%20Tahoe%20Area%20Sierra%20Club%20-%20Joint%20Comments.pdf; http://www.trpa.org/documents/reisc/6_Comments%20Received%20Outside%20Comment%20Period/Comments%20received%20prior%20to%20release%20of%20Final%20Drafts/Friends%20of%20West%20Shore.pdf; http://www.trpa.org/documents/reisc/6_Comments%20Received%20Outside%20Comment%20Period/Comments%20received%20after%20release%20of%20Final%20Drafts/TASC_FOWS_8.pdf; http://www.trpa.org/documents/reisc/6_Comments%20Received%20Outside%20Comment%20Period/Comments%20received%20after%20release%20of%20Final%20Drafts/TASC_FOWS_2.pdf

[23] http://friendswestshore.org/wordpress/wp-content/uploads/2014/12/Appellants-Final-Reply-Brief-12-23-14.pdf; http://friendswestshore.org/wordpress/wp-content/uploads/2014/10/Sept-30-2014-RPU-Appeal-Opening-Brief.pdf;

[24] http://www.trpa.org/about-trpa/how-we-operate/thresholds/

VMTs estimated by TRPA from this project, considering those impacts will occur along the West Shore and in Tahoe City - both areas which are documented by the Tahoe Environmental Research Center[25] to have elevated amounts of attached algae in the nearshore.



Example from most recent State of the Lake Report (2014)

Given the overwhelming evidence that this project will increase vehicle trips (including the TMPO's own analysis, as noted above), and not likely reduce congestion (affecting LOS) for more than a few years until traffic levels again rise, the transportation analysis is wholly inadequate. Further, this failure infects the EIR/EIS/EA's other analyses of impacts to air quality, noise, water quality, recreation, scenic, and other impacts affected by increased VMT and vehicle trips.

The public cannot meaningfully comment on the analyses of the project's impacts across multiple environmental thresholds and standards when the draft EIR/EIS/EA fails to analyze or disclose the impacts. For this reason, the DEIR/EIS/EA should be revised to reflect these impacts and recirculated to the public for proper review.

[25] State of the Lake Reports, 2008-2014; see information for "Shoreline Algae Distribution" in each Biology Chapter: "Zones of elevated PBI are evident, particularly along the north and west shores of Lake Tahoe,…"

V. Land Coverage

The proposed bypass would create a net increase in coverage as represented below:

Table 4.5-5 Net Increase in Land Coverage

Alternative	Surface Type	Coverage by Land Capability District (acres)		
		1b	5	Total
Alternative 1 (Proposed)	Roadway	0.53	3.66	4.19
	Bike Path	0.07	0.14	0.21
	Total	0.6	3.8	4.4
Alternative 2	Roadway	0.53	3.67	4.2
	Bike Path	0.07	0.14	0.21
	Total	0.6	3.81	4.41
Alternative 3	Roadway	0.5	2.37	2.87
	Bike Path	0.07	0.14	0.21
	Total	0.57	2.51	3.08
Alternative 4	Roadway	0.87	2.73	3.6
	Bike Path	0.03	0.16	0.19
	Total	0.9	2.89	3.79
Alternative 6	Roadway	0.28	-0.03	0.25
	Bike Path	0	0.05	0.05
	Total	0.28	0.02	0.3
Alternative 6a	Roadway	0.29	-0.64	-0.35
	Bike Path	-0.02	0	-0.02
	Total	0.27	-0.64	-0.37

Source: Wood Rodgers 2014

As noted in the RTP/SCS EIR/EIS, lands in Land Capability District (LCD) 1b are over-covered by 650 acres and are not meeting the threshold standard.[26] Coverage in LCD 1b must be reduced in order to attain the TRPA threshold. However, Alternatives 1-4 would increase coverage, notably in LCD 1b. The EIR/EIS/EA concludes the impacts of this increase are less-than-significant "*Because the coverage increase associated with Alternatives 1, 2, 3, and 4 would comply with TRPA land coverage regulations, including mitigation of disturbances in LCD 1b at a ratio of 1.5:1, the potential for these alternatives to create an adverse effect related to land coverage would be less than significant."* (DEIR/EIS/EA p. 4.5-26).

However, it does not appear the proposed project/Alternatives 1-4 meet TRPA's criteria associated with the exemptions provided by TRPA's land coverage regulations, as discussed below.

[26] "According to the 2011 Threshold Evaluation for soils, LCDs 1A, 1C, and 2 through 7 are meeting the threshold standard based on hard impervious cover. LCD 1B is not meeting the standard as existing hard impervious cover is estimated to be exceeding allowable land coverage by 650 acres or 680 percent." (RTP/SCS EIR/S p. 4-19)

TRPA Exemptions for Coverage in LCD 1b do not apply

The DEIR/EIS/EA states the following:

> Although TRPA Code Section 30.5 prohibits additional land coverage in low capability land, an exemption is provided for public service facilities (i.e., linear public facilities or LPF). (DEIR/EIS/EA p. 4.5-26).

TRPA Code section 30.5 provides the exemption to coverage in LCD 1b (SEZ) as follows:

> 30.5.2.
> C. Public Service
> Land coverage and disturbance for public service facilities may be permitted in Land Capability District 1b (Stream Environment Zone) if TRPA finds that:
> 1. The project is necessary for public health, safety, or environmental protection;
> 2. There is no reasonable alternative, including a bridge span or relocation, that avoids or reduces the extent of encroachment in the stream environment zone; and
> 3. The impacts of the land coverage and disturbance are fully mitigated in the manner set forth in subparagraph 30.5.1.B.5, with the exception that the restoration requirement in such subsection shall apply exclusively to stream environment zone lands and shall include coverage and disturbance within the permitted Bailey coefficients. [Emphasis added]

However, as shown in Alternatives 6 and 6a, as well as documentation regarding Alternative 5 (and options Caltrans will have to address needed bridge repairs), there are reasonable alternatives that can avoid encroachment in the stream environment zone. Therefore, the exemption for the coverage provided by Code section 30.5 is not applicable and the new coverage in Alternatives 1-4 is not exempted by the Code.

Further, the 'justifications' provided for why the new highway section in Alternatives 1-4 should qualify completely ignore the fact that alternatives exist. The EIR/EIS/EA states:

> Because the rehabilitation or replacement of Fanny Bridge is necessary because it does not meet current Caltrans seismic design standards; the position of SR 89 in proximity to the river requires the creation of land coverage for the new bridge within LCD 1b soils; and the increased land coverage and disturbance would be minimized and mitigated though application of BMPs and restoration of 1b lands at a ratio of 1.5 acres of restoration for every 1 acre of disturbance (per TRPA Code Section 30.5.3), the action alternatives would qualify for this exemption.

There are other ways to ensure Fanny Bridge meets Caltrans seismic standards, including Alternatives 6, 6a, and options available under Alternative 5. The position of SR 89 in proximity to the river is only applicable under Alternatives 1-4. The statements about mitigation only apply if the criteria regarding 'no feasible alternative' can be met. Given there are other feasible alternatives available, the Code cannot exempt the coverage, and the proposed mitigation is irrelevant.

Even if the coverage in the SEZ qualified for the LPF exemption, the EIR/EIS/EA suggests that coverage in excess of the base allowable may be required, and refers to two Code sections that presumably allow this. The EIR/EIS/EA also states that the amount of excess coverage cannot be determined at this stage, and will be addressed during application and review by TRPA. As it remains unclear when the public will

be able to weigh in on this issue, we include the following comments regarding excess coverage in the SEZ. First, the EIR/EIS/EA states:

> "TRPA's base allowable coverage standards by LCD normally limit the amount of coverage permitted for a project on a parcel-by-parcel basis (Section 30.4.1.A of the TRPA Code). However, because the project would be an LPF, per Section 21.4 and 30.4.2.D of the TRPA Code, the allowable land coverage would be limited to the minimum amount needed to achieve its public purpose…" (DEIR/EIS/EA, p. 4.5-26).

The statement references Code section 30.4.2.D, which does not exist. We assume the intended reference may have been Code section 30.4.2.A.2:

> 30.4.2.A.2. Linear Public Facilities and Public Health and Safety Facilities
> The maximum land coverage for linear public facilities and public health and safety facilities is limited to the minimum amount needed to achieve their public purpose, except as provided for non-motorized public trails in subsection 30.4.6.D.3. Such transfer may be permitted, provided TRPA makes the following findings:
>
> a. The project complies with required findings for additional public service facilities if required pursuant to Section 50.8;
>
> b. There is no feasible alternative that would reduce land coverage;
>
> c. The project, because of its unusual configuration or service requirement, requires special consideration; and
>
> d. The facility primarily serves the needs of persons other than those who are or will be residents of the lands in question, or the owners of the land in question. [Emphasis added]

Alternatives 1 through 4 already fail meeting these criteria based on item b. alone because there are feasible alternatives. However, we also examined item a., which refers to the following Code section:

> 50.8.2. Definition of "Additional" Public Service Facilities
> Public service facilities shall be considered "additional" if they are to be created pursuant to a TRPA approval issued on or after January 1, 1987. The conversion of an existing nonpublic service facility use to a use constituting a public service facility shall be an additional public service facility subject to this chapter. The following shall not be "additional" public service facilities:
> A. The reconstruction or replacement on the same parcel of legally existing public service facilities;
> B. Modifications to legally existing public service facilities and their accessory uses that do not create additional service capacity;
> C. Public or quasi-public utility service connections;
> D. Replacement or reinforcement of pipelines or transmission lines that result in no significant increase in service capacity; and
> E. Telephone lines, local distribution facilities, and similar facilities. [Emphasis added]

Alternatives 1-4 fail to meet these criteria as well, because they all create additional service capacity.

Additional Land coverage from public facilities was not examined in RTP/RPU EIR/S:

The EIR/EIS/EA must clearly disclose that the new coverage associated with Alternatives 1-4 was not analyzed in the RTP/RPU environmental review documents[27] and clearly analyze the impacts of the new coverage.

VI. Scenic Impacts

The DEIR/EIS/EA fails to adequately analyze and disclose the potential scenic impacts of the project, both during the daytime and at night. The TRPA Compact[28] (Article I) specifically requires that TRPA's role includes:

> "(6) Maintenance of the social and economic health of the region depends on maintaining the significant scenic, recreational, educational, scientific, natural public health values provided by the Lake Tahoe Basin…"(10) In order to preserve the scenic beauty and outdoor recreational opportunities of the region, there is a need to insure an equilibrium between the region's natural endowment and its manmade environment." [Emphasis added].

The TRPA Goals & Policies[29] also call for the protection of Lake Tahoe's scenic values, and TRPA adopted thresholds[30] to protect scenic quality. Examples include, but are not limited to, the following:

> "LU-1.1 THE PRIMARY FUNCTION OF THE REGION SHALL BE AS A MOUNTAIN RECREATION AREA WITH OUTSTANDING SCENIC AND NATURAL VALUES.
> The economic health of the Region depends on a viable tourist and recreation-oriented environment. It is the intent of this Regional Plan, among other things, to encourage development that enhances these values.
> …
> GOAL SR-1
> MAINTAIN AND RESTORE THE SCENIC QUALITIES OF THE NATURAL APPEARING LANDSCAPE.
> SR-1.1 ALL PROPOSED DEVELOPMENT SHALL EXAMINE IMPACTS TO THE IDENTIFIED LANDSCAPE VIEWS FROM ROADWAYS, BIKE PATHS, PUBLIC RECREATION AREAS, AND LAKE TAHOE." [Emphasis added]

In TRPA's 1982 EIS for the development of the environmental threshold carrying capacities, it was recognized that:[31]

> "…Scenic quality is perhaps the most often identified natural resource of the Lake Tahoe Basin. Visitors to the area enjoy views of a magnificent lake sitting within a forested mountainous environment under clear blue skies. The Tahoe Basin is unique in that it combines visual elements normally found in several different landscape settings into one clearly defined region exhibiting exceptionally high aesthetic values…"
> "…The distinctive mountain landforms surround the flat plane of the Lake, creating an enclosed landscape type. The edges between sky and ridgetops, between water and shore, and between vegetation and rock all add interest to the scenic landscape."
> "…views of natural landscape features uninterrupted by manmade development rank higher than views competing with or blocked by buildings. Also, large scale panoramic views rate higher than focused or intermittent, obscured views…" [Emphasis added]

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[27] These estimates of change in coverage do not include coverage resulting from public facilities, public infrastructure, or recreation facilities. (RPU DEIS, p. 3.7-19)
[28] http://www.trpa.org/bi-state-compact/
[29] http://www.trpa.org/wp-content/uploads/Regional_Plan_Goals_Policies_Final-2012-12-12.pdf
[30] http://www.trpa.org/wp-content/uploads/2_AppendixB_Resolution82-11.pdf
[31] *Environmental Impact Statement for the Establishment of Environmental Threshold Carrying Capacities*, Tahoe Regional Planning Agency. May 1982. (p. 44-45).

Size and scope of new bypass:

The EIR/EIS/EA describes the new bypass bridge as follows:

> The new bridge over the Truckee River would be located approximately 1,800 feet southwest of the existing Fanny Bridge in four of the action alternatives (Alternatives 1-4). The bridge would include two 11-foot through-traffic lanes (one eastbound and one westbound) and 8-foot shoulders on each side. The width of the proposed bridge would range from 80 feet at the eastern abutment to 100 feet at the western abutment. The structure would widen on the western abutment under Alternatives 1, 2, and 3 to accommodate the approach to the proposed western roundabout. The structure would use precast concrete girders and context sensitive railings, reflective of Tahoe City's surroundings, would be constructed along each edge of the bridge. Aesthetic treatments would be included in the design and construction of the bridge to be compatible with surrounding natural and human environment. There would be a minimum of 10 feet of clearance below the bridge under normal water level conditions, and 10 feet of clearance over the Tahoe Rim Trail/TCPUD bike path on the eastern shore of the Truckee River. (DEIR/EIS/EA, p. 3-11)

In other words, the bridge could span up to 100 feet in width. At the western bypass, it will be elevated up to ten feet. This is a significantly-sized bridge that should clearly be represented to the public. Yet there is not one image provided in the EIR/EIS/EA of what this bridge may truly look like (Exhibit 3-6 does not suffice, as discussed below). This is one reason FOWS requested an extension of the public comment period until after an upcoming TTD meeting which advertises additional visual information (copies of our request and the TTD's response are attached).

Further, the EIR/EIS/EA is unclear about the elevation over the river. If the bypass will be elevated up to ten feet at the western roundabout, will it also be elevated over the Truckee River? It appears that in order to provide ten feet of clearance from the bike trail, which we doubt will be constructed on the river's bed, but rather at some elevated point on the eastern bank, then this would suggest the bypass will be far more than ten feet from normal water conditions. As noted below in great detail, the images provided in the EIR/EIS/EA fail to show the scenic implications of Alternatives 1-4. Further, the project description throughout the DEIR/EIS/EA is inconsistent, making it difficult for the public to follow a text description of the proposed bypass (which given the lack of visuals, is all the public has to imagine the scale and scope of this bridge). The following image was created by a Tahoe City resident, and shows a 65 foot wide bridge – notably 35 feet less than the 100 feet included in the project description.

Simulated bypass image based on 65 foot wide bridge as described in Alt. 1 from the Air Quality Appendix of the DEIR/S; from Jim Sajdak

The DEIR/EIS/EA also fails to include images to reflect the potential impacts of Alternatives 6 and 6A, which could result in substantial widening of the Fanny Bridge by 49-60 feet.[32]

The DEIR/EIS/EA must be revised to include scenic information and clear project descriptions so the public can meaningfully assess and comment on the project alternatives.

Scenic impacts of elevated bypass to all locations:

As noted in NOP comments submitted by Mr. Tom Moeller (1/30/2012), "…*visitors don't come to Tahoe to enjoy our bypasses, they come to enjoy the natural scenery*." The unique scenic beauty of the Tahoe Basin is why TRPA's Compact specifically calls out for protection of scenic resources.

Failure to identify scenic impacts as required by TRPA:

The elevated bypass will mar scenic resources from multiple viewing areas. Because the DEIR/EIS/EA fails to examine the impacts of the elevated bypass, the EIR/EIS/EA fails

[32] Alt. 6:As a result, the new bridge would be 60 feet wider, and the centerline would be 28 feet downstream, as compared to the existing structure. The new Fanny Bridge would have 12-foot travel lanes, 8-foot shoulders, and 10-foot sidewalks on both sides
Alt. 6a: The increase in width would be approximately 49 feet. Similar to Alternative 6, the additional width would be downstream of the existing structure. The centerline of the new bridge would be 22 feet downstream from the centerline of the existing bridge. The new Fanny Bridge would have 12-foot travel lanes, 8-foot shoulders, and 10-foot sidewalks on both sides. (DEIR/EIS/EA, p. 2-7)

to "examine the impacts to the identified landscape views from roadways, bike paths, public recreation areas, and Lake Tahoe" as required by TRPA's Goals and Policies (SR-1.1). Not only does the EIR/EIS/EA lack a clear description of the bypass, its route, height, and width through the 64-acre Tract, or include any simulated visuals of the elevated bypass (as noted elsewhere, the few simulated views of the roundabouts and bridge that are included do not appear elevated), but the EIR/EIS/EA also fails to consider the visual impacts from locations beyond the project area.

Impact conclusion not supported by evidence:

The DEIR/EIS/EA's impact assessment related to scenic quality seemingly downplays the impact of the new elevated bypass. "Increas[ing] built environment features" does not clearly reflect the impact of constructing a new elevated highway through the forested area, nor does "experience visual change" correctly describe the replacement of open, forested views with an elevated highway bypass. The assessment concludes a "potentially" significant impact for Alternatives 1-4, although "potentially" does not seem appropriate. *Open forested views will be replaced by an elevated highway bypass*. This is a significant impact.

> Impact 4.14-2. Change the existing visual character or quality of the project site after completion. Alternatives 1 through 4 would increase built environment features within the 64-Acre Tract and across the Truckee River. Views from the Tahoe Rim Trail in the 64-Acre Tract near the new bridge approach and from the river itself, would experience visual change; however, the area is already altered by the presence of urban features. Because the reduction in the quality of scenic resources would be substantial near the bridge in the 64-Acre Tract and within the river corridor, this impact would be potentially significant for Alternatives 1 - 4. Alternatives 6 and 6a would rehabilitate or replace Fanny Bridge and reconfigure the existing wye intersection, but would not substantially alter the appearance of the bridge, once completed, nor the scenic quality of views in the area. Therefore, impacts under Alternatives 6 and 6A would be less than significant. Alternative 5, the No Action Alternative, would have no impact on visual quality or character.

Inadequate mitigation:

The proposed mitigation measure[33] falls far short of addressing this impact. A non-vegetated elevated bypass through the 64-acre Tract will block existing open views just as much as a vegetated bypass. Landscaping cannot make the bypass invisible. The EIR/EIS/EA needs to clearly analyze and disclose, in clear terms, the impact of the alternatives. Where impacts are significant and unavoidable, they must be disclosed as such.

In addition, reliance on vegetation to mitigate scenic impacts of new development simply doesn't hold water. Not only do trees die, become ill, and take a long time to grow, but as reflected in recent examples in the Tahoe Basin, project renditions often reflect a much more pleasant, and typically unrealistic image, of the scenic 'screening' of new projects.

[33] Mitigation Measure 4.14-2. Minimize visual change and visually screen infrastructure with replanted forest vegetation. The following mitigation applies to Alternatives 1 through 4. To maintain the existing visual quality and decrease the visual effects caused by the project, the following design, construction, and maintenance actions shall be implemented. These actions will soften the visual intrusion of the new bridge and realigned highway on the 64-Acre Tract. (DEIR/EIS/EA, p. 2-38).

For example, the Domus affordable housing project in Kings Beach looks nothing like the more subtle, screened simulation provided prior to construction:[34]

Pre-project artist rendition

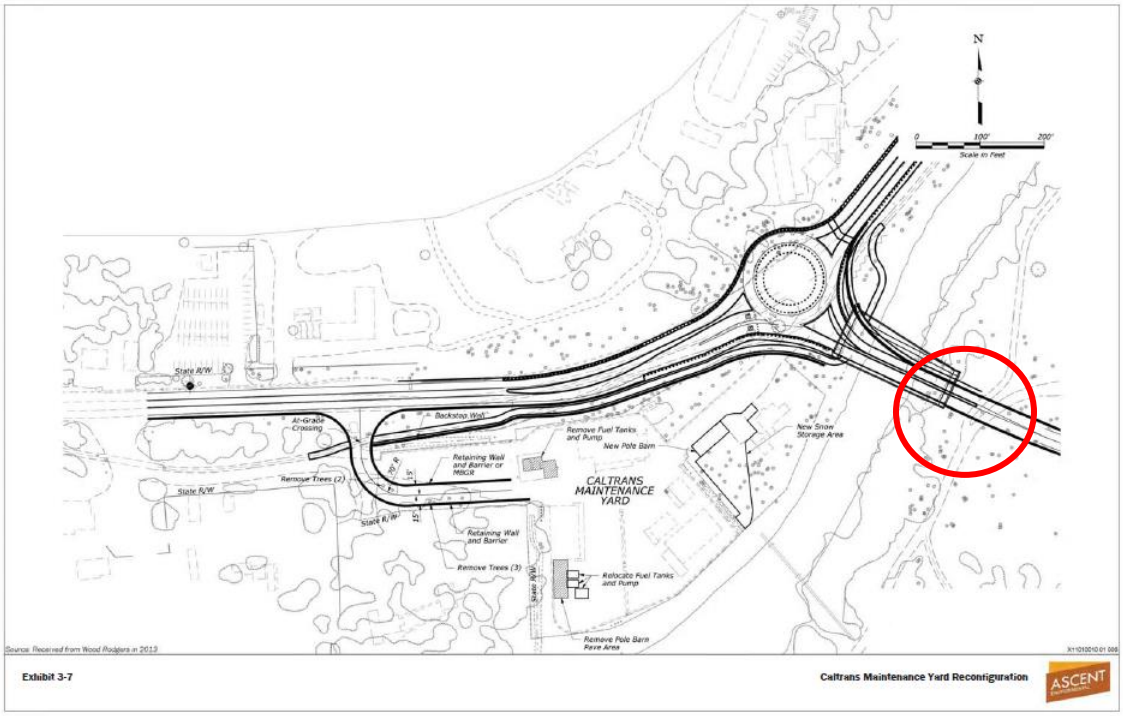
Post-project image

Lack of sufficient visuals:

The photograph simulation provided in the DEIR/EIS/EA (Exhibit 3-6) is far too limited for the public to be able to discern the scenic impacts of the highway. First, it does not appear the bridge is elevated as described in the text[35] (more detailed comments on this are provided below). In fact, a physical sketch or image clearly showing the elevated bypass could not be located in the DEIR/EIS/EA. For example, in the sketch below, is the circled area the new segment of bike trail that will require 10 feet of clearance by the bypass above it? The EIR/EIS/EA does not make this clear.

[34] Photos from: http://www.moonshineink.com/news/did-domus-deliver

[35] The realigned SR 89 would be also raised approximately three to nine feet on an earthen embankment, traveling from east to west, which would increase the visibility of the roadway and passing vehicles. The bridge site would be visible from the Tahoe Rim Trail/bicycle path along the south side of the River within the 64-Acre Tract in some locations. Exhibit 4.14-8 shows the view to the north along the path of the bridge site. (p. 4.14-24).



Unrealistic visuals:

Although the EIR/EIS/EA's description suggests a fairly unobtrusive image of the new bypass bridge,[36] the bridge will not be constructed without disturbance to the land nearby, nor will it only have one small vehicle on it as depicted in Exhibit 3-6.

[36] The change in view from the existing pedestrian bridge on the Truckee River looking downstream is depicted on Exhibit 4.14-11. The bridge would have a low profile so that it would not substantially obscure views of the surrounding forest but would partially truncate the distant view of the river and the forested hillside beyond. (DEIR/EIS/EA, p. 4.14-22)

Simulations must include the bridge with vehicles, from other angles, including both sides of the river, from surrounding mountaintops and Lake Tahoe (from any point where this raised highway may be seen), and views without as many trees, since trees will be cut for the project (and more trees tend to die during or shortly after construction; South Shore's "Marriott/Heavenly Village" redevelopment is a prime example of this).

The EIR/EIS/EA must include sufficient and correct depictions of the alternatives in order for the public to meaningfully understand and comment on the alternatives.

TRPA Viewpoints:

TRPA viewpoints 1, 2, 3, 4, 5, and 8 do not include areas affected by the bypass. Viewpoint 6 is pointed north on 89 where the western roundabout of the new bypass would be located, and viewpoint 7 appears to represent a site where the new bypass will cross the 64-acre Tract. Also, while the viewpoints are provided, no visual assessment of the impacts of each alternative on the viewpoints are included.

USFS Key Observation Points:

The Key Observation Points (KOPs) 1, 2, 4, and 6 appear to focus on areas that will be impacted by the new western roundabout and bypass. Comments are as follows:

KOP 1:

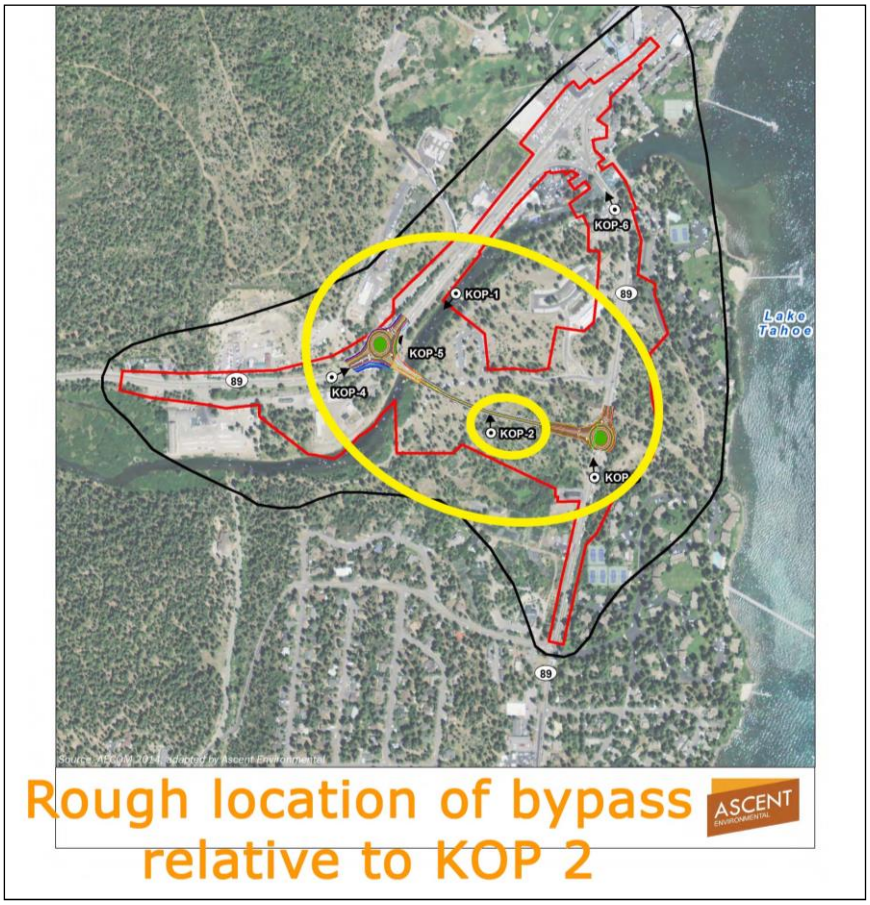
The EIR/EIS/EA presents the existing view from KOP 1, along with a simulated view of the bridge. However, the simulated view does not appear to represent a raised bridge, and it is unclear whether the bridge will be ten feet from the floor of the river, or ten feet above the bike path (which is presumed itself to be raised from the riverbed).

In addition, this image paints a far more pleasant picture than can be expected. For example, trees will be removed to construct this project. Vehicles will be crossing the roadway, creating dust and emissions. The EIR/EIS/EA must disclose the potential visual impacts of the project. Although the following images below have not been professionally created, they are included to represent the types of simulations that should be included in the DEIR/EIS/EA to better reflect the reality of what the impacts could be. The first image includes the EIR/EIS/EA's simulated bridge from KOP 1, however vehicles, emissions, and other highway debris have been added. The second image below includes a higher bridge, roughly raised another ten feet above grade level at the sides of the river, as it is unclear from the EIR/EIS/EA exactly how high the bridge will pass over the river.

KOP 2:

Oddly, the DEIR/EIS/EA includes no visual assessments of the impacts to KOP 2, which is an area representing the undeveloped forested section of the 64-acre Tract. The DEIR/EIS/EA acknowledges this point: "*The view from KOP 2 consists of a forest scene that provides relatively intact forest vegetation, which does not contain any urban features.*"[37] Although Exhibit 4.14-10 identifies the location of the KOPs, and the DEIR/EIS/EA notes the bypass *will be visible from KOP 2 and other points in the 64-acre tract,*[38] the DEIR/EIS/EA fails to include a picture representing the existing view from KOP 2, let alone a simulation of what it would look like with the bypass in Alternatives 1-4.

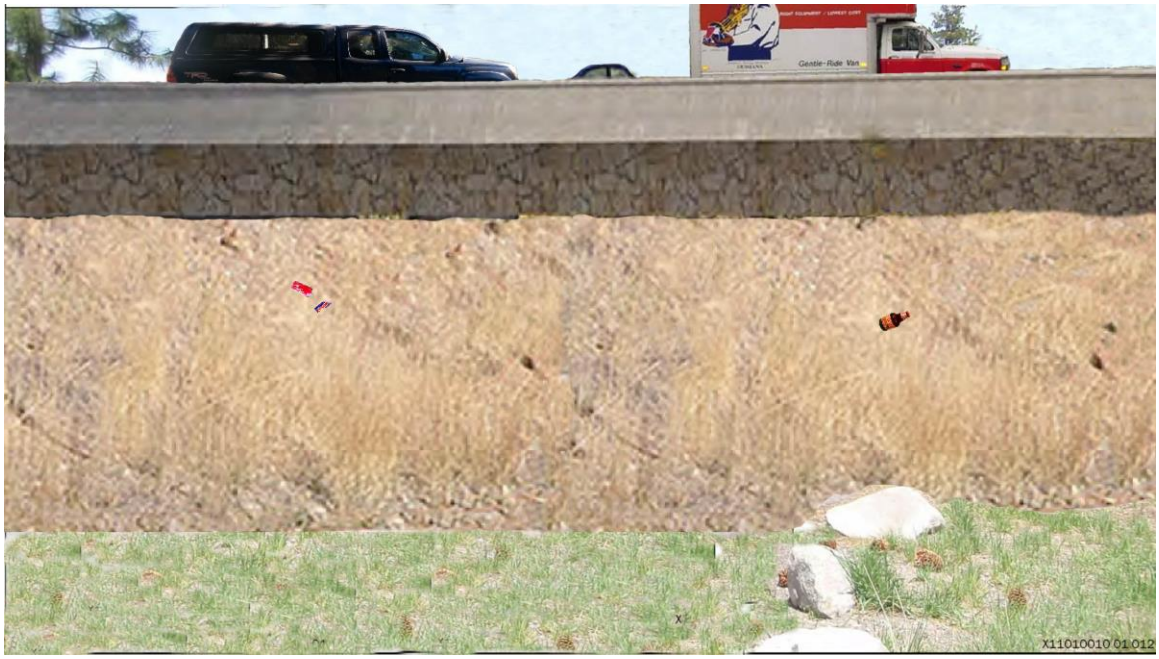
In a rough comparison of the location of the new bypass to the KOP 2, it appears the bypass would be built in the same location as the KOP 2. The EIR/EIS/EA needs to clearly show the before and after impacts to this observation point.



[37] The potential change in views of the 64-Acre Tract from a location adjacent to the existing bike path south of the realigned SR 89 looking north would be available at KOP 2. The view from KOP 2 consists of a forest scene that provides relatively intact forest vegetation, which does not contain any urban features. [Emphasis added] (DEIR/EIS/EA, p. 4.14-24)

[38] Implementation of the Alternative 1 would result in construction of the realigned portion of SR 89, which would be visible from KOP 2 and other locations within the 64-Acre Tract. The realigned portion of SR 89 would be elevated on an earthen embankment from three feet above current grade near the eastern roundabout, up to nine feet above current grade near the bridge (see Exhibit 4.14-15, typical cross-section). [Emphasis added] (DEIR/EIS/EA, p. 4.14-29)

For example, the following image is not a professional simulation, but intended to represent the type of information the DEIR/EIS/EA needs to include. Although unclear, based on the limited information available to the public, it appears the bypass may be placed right at the KOP 2 viewpoint. If this is correct, then a "*forest scene that provides relatively intact forest vegetation, which does not contain any urban features*" could be replaced with a view such as the following:



The EIR/EIS/EA must include the best available and most accurate information about how the view may be impacted. Currently, the EIR/EIS/EA doesn't even attempt to address impacts to the KOP 2 viewpoint.

KOP 4:

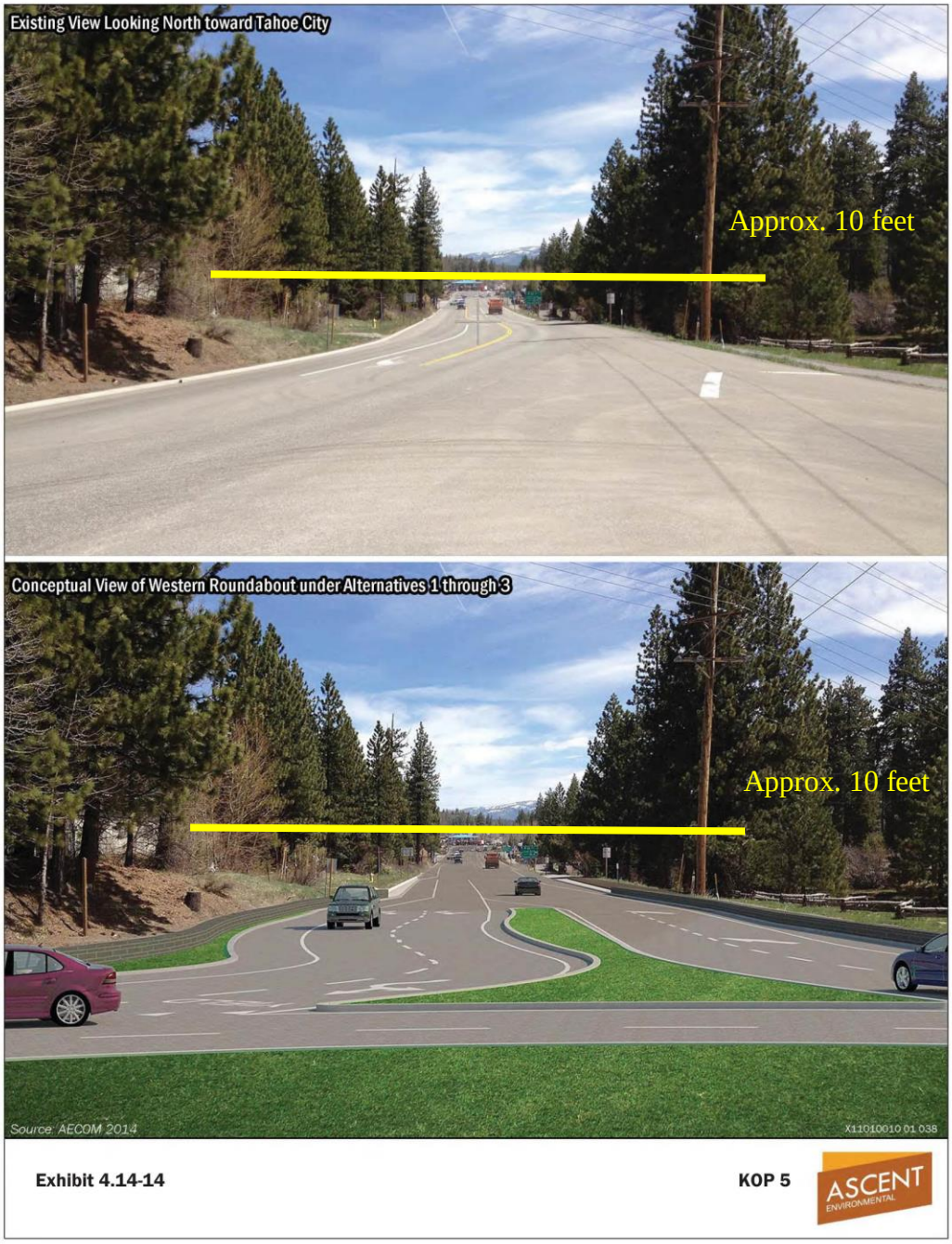
KOP 4 represents the view one would see entering the Tahoe basin from S.R. 89 north. The EIR/EIS/EA provides the following before and after pictures:

However, once again the visual images do not appear to reflect the description in the text, which includes a raised bypass of up to ten feet. This lack of clarity makes it impossible for the public to assess the potential visual impacts of the bypass. For example, the following image notes the approximate location of the roadway if raised 10 feet.

KOP 5:

A local Tahoe City resident placed ten foot poles at the intersection labeled KOP 5 in the EIR/EIS/EA to represent where an elevated embankment would be. As the resident's picture reflects below, the elevated bypass would significantly change the views in this area.

However, the KOP 5 simulation in the EIR/EIS/EA appears to be based on ground level. If this bypass will be elevated above the existing ground level, the visual simulations need to clearly reflect the changes.



Vegetation and screening:

Finally, the reality of the situation is that vegetation may not grow as depicted in the pictures, especially due to the impacts of climate change and drought. Simulations should depict vegetation more reflective of the area, which includes the dry vegetation seen in

the existing images. We refer back to the example of the simulated Domus building versus the actual post-construction Domus building as a key representation of the unrealistic portrayal these simulations can provide.

In conclusion, due to the failures to analyze all viewpoints and KOPs, to include accurate depictions of what the proposed alternatives may look like, and the use of unrealistic, 'dressed-up' simulations, the DEIR/EIS/EA fails to adequately assess and disclose the visual impacts of the project.

This deficit makes it impossible for the public to consider the project impacts. A revised DEIR/EIS/EA is warranted so the public can provide meaningful comments on the scenic impacts of the project. The revised scenic analysis needs to include photographs of all points of scenic interest, including the identified scenic viewpoints, the KOPs, and any areas on the Lake, or mountainside, where the new bypass (and headlights) will be visible. The analysis must include sufficient information and simulations to disclose to the public the scenic impacts of each alternative at each location. All scenic points of interest must include a before and after.

Scenic impacts to Night Sky from headlights on new bypass (Light Pollution)

Impact 4.14-4[39] requires the EIR/EIS/EA assess the impacts of the alternative on nighttime views. Light pollution has become an increasing problem in many areas of Lake Tahoe, yet stargazing and dark night sky views are scenic resources appreciated by both residents and visitors (and which must be protected per TRPA's Compact). Projects must be carefully reviewed for their impacts to this resource. Comments submitted on the NOP by Jim Sajdak requested the DEIR/EIS/EA to "*Provide a night lighting study addressing the increased light levels and light pollution.*" However, as noted herein, although the DEIR/EIS/EA acknowledges glare from vehicles in the daytime, the focus is solely on non-mobile sources,[40] and fails to even mention the impacts of headlights on the raised roadway (see discussion on p. 4.14-36 and -37).

The EIR/EIS/EA must analyze the impacts to night sky from the headlights of vehicles that will use the new roadway. Changes in direction, location, angle, height of the roadway, and other factors will all affect the impacts of light pollution from the project. This discussion is completely absent from the EIR/EIS/EA.

[39] Impact 4.14-4. Create a new source of light and glare that would adversely affect day or nighttime views in the area. [Emphasis added] (DEIR/EIS/EA, p. 4.14-36)

[40] …The action alternatives would increase lighting within the 64-Acre Tract and across the Truckee River by adding new light fixtures. Existing regulations and standard design practices would restrict light fixture locations, lighting visibility from surrounding area, the type and intensity of lights, and the direction of light projection. The localized nature of new light sources and use of standard low glare and night glow designs would minimize light and glare effects in the study area. Thus, because new lighting sources would be limited to roundabouts and the new bridge, this impact would be less than significant for Alternatives 1 through 4… (DEIR/EIS/EA, p. 4.14-36)

VII. Recreation Impacts

Given that alternatives 1-4 will result in a highway being constructed through what is now a recreational area, it is imperative that the DEIR/EIS/EA carefully consider and disclose the impacts to recreation in the project area. However, the DEIR/EIS/EA fails to even include data regarding existing conditions, let alone analyze the impacts on recreational access and experience.

Existing/Baseline Conditions:

The DEIR/EIS/EA provides very little data regarding recreational uses and considerations in the project area. The only information included comes from a regional LTBMU survey, which does not address the specific conditions in the project area, and annual TCPUD surveys, which provide no information on user expectations and preferences. [41] Such basic information is required to evaluate the impacts with regards to the significance criteria noted for NEPA and TRPA, respectively: *"[will the project] adversely alter or decrease the recreation resource values of the project area to the extent that recreational user experience or opportunity is substantially diminished,"* and *"[will the project] have the potential to create conflicts between recreation uses, either existing or proposed."* (DEIR/EIS/EA, p. 4.13-15). Notably, in order to assess whether the project will impact recreational uses, the existing value, user experiences, and opportunities must be determined. In fact, it is surprising that the applicant(s) failed to perform what could come down to a few days' time performing surveys during peak and off peak times.

The EIR/EIS/EA must examine and disclose both the existing conditions and the potential impacts of each alternative on these criteria.

In addition, of the more detailed survey information that we could locate, it appears that none of the users of the trail sought an 'urbanized feel' be brought or enhanced in this area. Rather, of the forty comments from 64-acre Tract recreation users, gathered by the Tahoe Coalition of Recreation Providers (July 2007; attached) during a more comprehensive recreation survey, the general theme suggested users were extremely happy with the recreation trails, were thankful to have them and wanted more of them, and as one user noted, more trails "off roadway as possible." However, no survey questions were posed to assess how users would feel about a large, wide elevated highway cutting through the recreational area.

[41] "Survey information regarding user satisfaction has been gathered for the overall LTBMU through the USDA Forest Service National Visitor Use Monitoring Program; however, it is not available for a single site, such as the 64-Acre Tract or the Truckee River…User data has been collected annually since 2005 by TCPUD for trails in the project vicinity. These surveys are conducted during the peak period of August and include data on use level, type of use, and visitor characteristics. Information on user expectations and preferences is not collected. Surveys collected on August 14th and 15th, 2013 found that the majority of trail users in this area are visitors or seasonal residents and that most of the trail users (65 percent) begin their trip at their home or lodging facility…"(TCPUD 2013). [Emphasis added]. (DEIR/EIS/EA, p. 4.13-13).

Failure to Analyze impacts to Significance Criteria:

As noted previously, the NEPA and TRPA criteria for assessing recreational impacts include: *"[will the project] adversely alter or decrease the recreation resource values of the project area to the extent that recreational user experience or opportunity is substantially diminished,"* and *"[will the project] have the potential to create conflicts between recreation uses, either existing or proposed."* (DEIR/EIS/EA, p. 4.13-15).

The DEIR/EIS/EA appears to take four approaches to presumably 'address' impacts related to use conflicts.

1. **Issues Not Warranting Further Examination:**
   First, the EIR/EIS/EA relieves itself of any examination in the "Issues not warranting detailed evaluation" section by stating, *"Because the action alternatives would not change any existing recreation uses or types of facilities, there would be no effect on use conflict. This topic is not discussed further."* (p. 4.13-15). Four of the action alternatives will place a new highway, raised up to ten feet, through the center of the recreational area. Clearly it does not take more than common sense to acknowledge that this new highway may create some 'user conflicts.' Increased noise, exhaust fumes, and the intrusion of a large highway into the now open area will no doubt have an impact on existing recreational uses.
2. **Reference to adopted land use plans and Dismissal of Section 4(f):**
   Second, the EIR/EIS/EA suggests no impact under "Impact 4.13-3: Reduction of public forest land available for dispersed recreation," because the "*realigned highway has been reflected in adopted land use plans for decades (since the 1980s)…"* (p. 4.13-21). There are two big problems with this claim:
   i. As frequently referenced throughout the EIR/EIS/EA, the current 'adopted land use plan' includes the 2012 TRPA/TMPO RTP/SCS. Interestingly, the RTP/SCS EIR/EIS included a discussion regarding the impacts of the package of transportation projects (which included the proposed Fanny Bridge realignment) on recreation. It concluded there would be no impacts related to the impact on "Compatibility with Existing Recreation Resources"[42] **because:** "…*protection of public park and recreation areas would be provided by Section 4(f) of the DOT Act for projects receiving federal transportation funds.*" [43] (RTP DEIR/S p. 3.11-13).

[42] "Impact 3.11-1 Compatibility with Existing Recreation Resources. The proposed RTP/SCS would result in projects in the Region that could potentially conflict with existing recreation resources and areas. However, existing Recreation Element Goals and Policies address potential conflicts and incompatibility of recreational areas and facilities with surrounding land uses. In addition, implementation of the RTP/SCS would provide new recreation facilities (i.e., trails) and improved access to existing recreation facilities for pedestrians, bicyclists, transit riders, and drivers. This impact would be less than significant for all alternatives." (RTP/SCS DEIR/S p. 3.11-12).

[43] "Section 4(f) of the Department of Transportation (DOT) Act of 1966 states that a transportation program or project requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance can be approved only if there is no prudent and feasible alternative to using that land and if the program or project includes all possible planning to

In fact, the RTP specifically referred to the applicability of Section 4(f) in preventing these impacts **from the Fanny Bridge Realignment Project**: *"For example, the SR 89/Fanny Bridge Community Revitalization Project could result in a roadway realignment through an area designated as recreation and could affect access and uses through the USFS 64-acre tract area. For projects implemented using federal funds, Section 4(f) of the DOT Act would diminish the risk of conflict by requiring implementation of feasible and prudent alternatives to any encroachment into public park and recreation areas."* (RTP DEIR/S p. 3.11-12). However, although the Fanny Bridge Project is receiving federal funds, the DEIR/EIS/EA dismisses Section 4(f), claiming it does not apply[44] (DEIR/EIS/EA p. 6-13 to 6-14). Therefore the reliance on any conclusions from the RTP/SCS (or RPU) documents – which assumed no impact *because* Section 4(f) would apply, is not appropriate.

ii. Where the DEIR/EIS/EA suggests no impacts because the project has been listed (notably *not analyzed*) in land use plans for decades, we point out that being listed in old planning documents is no substitute for the environmental baseline/existing conditions – nor the required examination and disclosure of the impacts of each alternative on those conditions - for which the DEIR/EIS/EA must now examine.

3. Conclusion not based on significance criteria

Third, the DEIR/EIS/EA employs an unexplained mathematical conclusion that the impacts are less than significant because the physical footprint of the new highway segment does not exceed ten percent of the currently undeveloped public land.[45] However, there are no related significance criteria

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minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use." RTP/SCS DEIR/S p. 3.11-5

"Alternative 3 would include transportation projects that would provide improved pedestrian, bicycle, transit, and vehicle access throughout the Region, including access to existing recreation facilities. Implementation of Transportation Strategy Package C would result in new bicycle and pedestrian projects that could include passive recreation facilities, but to a lesser extent than Alternative 2. Therefore, implementation of Alternative 3 would result in increased availability to recreation facilities by increasing access, especially access to alternative transportation modes. Also, protection of public park and recreation areas would be provided by Section 4(f) of the DOT Act for projects receiving federal transportation funds. Implementation of Alternative 3 would result in a **less-than-significant impact**." [Emphasis added]. (RTP DEIR/S p. 3.11-13)

[44] "The Lake Tahoe Basin Management Unit of USFS provided concurrence on April 3, 2014, stating that ongoing planning for the 64-Acre Tract for both transportation and recreation uses indicates that the joint planning rule applies, and that Section 4(f) requirements do not apply (Gibson 2014)." (DEIR/EIS/EA, p. 6-14).

[45] "Based on conceptual engineering plans of Alternative 1, the area of the 64-Acre Tract to be occupied by highway and embankment, and therefore, no longer available for dispersed recreation uses, would be approximately 3.2 acres. This is about 9 percent of the 35 acres that constitute the existing remainder of public land from the original 64-Acre Tract…After development of the realigned highway, at least 90 percent of the 64-Acre Tract would remain available for dispersed recreation use and existing recreation

listed for NEPA, TRPA, or CEQA purposes (see pages 4.13-14 to -15), nor is there any explanation why this footprint is less than significant (or any information regarding why less than ten percent was chosen in this case).

4. **Speculations about the 'Effects on the quality of recreation use experience."**

The EIR/EIS/EA fails to address the impacts on the quality of recreation use experience (Impact 4.13-4[46]; discussion begins on p. 4.13-22). As noted above, no existing condition/baseline information regarding recreational experiences, expectations, and opportunities has been gathered for the project area. Unlike other impacted resources (e.g. transportation counts/modeling, air quality monitoring, etc.), gathering this information should not require a substantial amount of resources. That the project aims to place a highway through a recreation-zoned area, used by locals and tourists regularly, should clearly indicate the need for a careful and balanced examination of the impacts on recreation use experience.

Next, the EIR/EIS/EA aims to substitute a careful consideration of impacts with 'opinions' about what expectations 'might' be 'reasonable:'

> While survey research data is not available to precisely define user expectations and perceptions in the study area, the existing setting would make it reasonable to anticipate that expectations reflect the understanding that the area, which is heavily used and located where traffic, surrounding urban development, and considerable human interactions are present. Designation of the affected land as "rural" within the recreation opportunity spectrum of the USFS would be consistent with both current and post project conditions. [Emphasis added] (DEIR/EIS/EA, p. 4.13-22)

> Recreational users engaged in outdoor activities are generally sensitive to changes in views; however, user expectation would reasonably include encountering infrastructure and urban features, because such features are already present in the study area and surrounding vicinity. (DEIR/EIS/EA, p. 4.14-22).

Consultant or agency opinions do not replace necessary information, assessment, and disclosure of impacts. In addition, community 'open space' has been identified as an important resource by countless planning agencies, including the TRPA. The apparent 'logic' being used to skirt the issue in the EIR/EIS/EA runs counter to the concepts associated with having community open space.

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facilities would be maintained. Forest land on both sides of the realigned highway would be connected via a new trail section and grade-separated crossing (i.e., trail tunnel through the highway embankment), Consequently, although conversion of public forest land would be an adverse consequence, it would not be substantial because of the retention of 90 percent of the public land for dispersed recreation use, and re-established trail connectivity; this impact would be less than significant." (p. 4.13-21)

[46] Impact 4.13-4. Effects on the quality of recreation use experience. The quality of an outdoor recreation user's experience relates greatly to expectations for a visit and the ability to meet those expectations during an intended activity. Expectations are typically influenced by user experiences, physical characteristics of the recreation resource setting, and perceptions about the level and pattern of use. All the action alternatives would alter the resource setting of the 64-Acre Tract, regional trails, Truckee River, and Fanny Bridge area, which are the four major outdoor recreation resources in the study area.

> Finally, the claim that experience will be 'improved' because new/redeveloped infrastructure will be compatible with existing uses represents a baseless, circular argument.[47] As noted above, the EIR/EIS/EA fails to gather information on existing uses, address whether the proposed project is compatible with the existing uses, and examine the potential impacts to recreation experiences for each alternative. This ignores the importance of open space, noise (quiet), forest, scenery, and the other values recreationalists appreciate when recreating. Recreational experiences are about more than the number of cracks in an area of the pavement.

Survey information suggests importance of open space:

In the limited recreation information included in the EIR/EIS/EA, it is clear that most recreation users of the 64-acre Tract walk or ride to the area. A general survey referenced in the DEIR/EIS/EA, performed by the TCPUD in 2013, indicated 65% of users began their trip from home or their lodging facility,[48] although this survey included more locations than just the 64-acre Tract. However, in 2007, the Tahoe Coalition of Recreation Providers (TCORP) conducted a survey which specifically identified over 70% of those recreating in the area had walked from their home or lodging facility (excerpt below; full report attached). A more general survey referenced in the DEIR/EIS/EA, performed by the TCPUD in 2013, indicated 65% of users began their trip from home or their lodging facility,[49] although this survey included more locations than just the 64-acre Tract. Regardless, available evidence clearly shows that *most users recreate in this area without driving to it.*

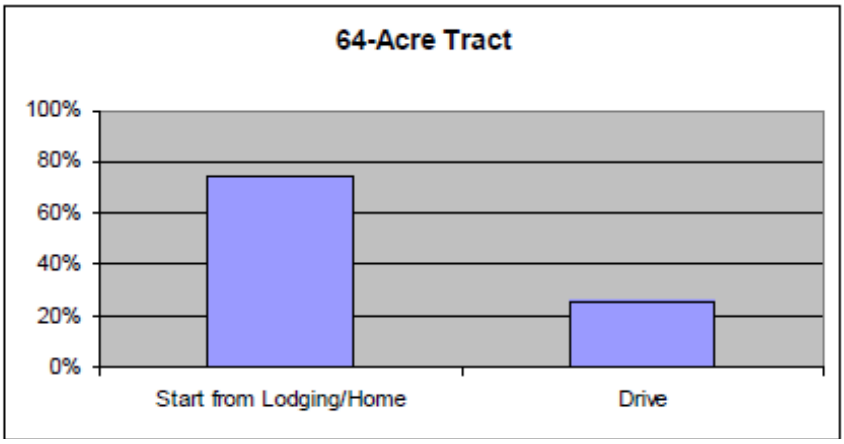
[47] As such, it is also reasonable to anticipate that the action alternatives would result in less-than-significant changes to the quality of recreation user experiences, because the alternatives improve, restore, or replace existing infrastructure in the study area that is compatible with its existing setting. The elevated highway realignment on an earthen embankment as part of Alternatives 1-4 would alter the visual and noise conditions of the study area, but the recreation character of the forest would not be significantly changed for dispersed recreation use. The No Action Alternative, Alternative 5 would have no impact on the quality of recreation user experience. (DEIR/EIS/EA, p. 4.13-22)

[48] Surveys collected on August 14th and 15th, 2013 found that the majority of trail users in this area are visitors or seasonal residents and that most of the trail users (65 percent) begin their trip at their home or lodging facility…(DEIR/EIS/EA, p. 4.13-14 and -15).

[49] Surveys collected on August 14th and 15th, 2013 found that the majority of trail users in this area are visitors or seasonal residents and that most of the trail users (65 percent) begin their trip at their home or lodging facility…(DEIR/EIS/EA, p. 4.13-14 and -15).

TCORP – Lake Tahoe Basin - Bike Trail Survey – July 2007
APPENDIX B
Graphic Results for Questions #2 and #4 for Selected Sites

Question 4: Did you start your trip from home or did you drive to the trail?



However, if a new bypass is added, this will bisect the now valued open space and recreation benefits of the 64-acre Tract. As a result, people may opt to visit (drive to) other less developed areas to recreate, thereby creating more vehicle trips. The DEIR/EIS/EA analysis also fails to assess recreation use off-trail, such as the dispersed uses within the forest, or along the river.[50]

In summary, the DEIR/EIS/EA analysis of impacts to recreation access and experience is wholly inadequate. Recreation surveys must be conducted by an objective, experienced entity during both peak seasons (summer and winter) to assess baseline usage and to gather data upon which to evaluate impacts to user experience. Further, surveys need to assess whether the 70+% of recreation users who walk to the area from their homes or lodging locations will instead drive to recreate if the bypass is constructed. Such impacts to VMT and vehicle trips must be included in the revised transportation analysis.

Pedestrians and bicycle access during flooding events:

Although the project descriptions for the bypass are unclear with regards to the east bank pedestrian/bike path, it appears the path-which will be relied upon to connect multi-model options from each side of the bypass[51]- may be located in an area that will be closed during flooding events[52] (which will increase due to climate change). It appears

[50] No data is available from the TCPUD surveys related to off-trail use, such as dispersed uses within the forest, along the river, or on the lakeshore. (DEIR/EIS/EA, p. 4.13-14 and -15).
[51] Multi-use trail connectivity on the 64-Acre Tract would be maintained for the Tahoe Rim Trail, Truckee River Trail, Lakeside/North Shore Trail, and West Shore Trail, with a grade-separated trail crossing beneath the new highway segment near the new Truckee River bridge (DEIR/EIS/EA, p. 4.13-19).
[52] Alternative 1 would relocate the bike path so that a portion of the bike path would cross under the proposed new bridge over the Truckee River on the east bank. Tahoe City Public Utility District (TCPUD) manages the bike paths within the project area and is responsible for closing all or portions of the bike path as necessary to protect public safety during high water events (Butterfield, pers. comm., 2014). Because

pedestrians and bicyclists would be required to cross the new bypass or walk to one of the roundabouts during flooding events. What are the recreational impacts of this change from existing conditions, where users can cross the area in any location?

This is another impact to recreation, and safety, which must be analyzed in the EIR/EIS/EA.

VIII. Section 4(f) Requirements:

The EIR/EIS/EA notes: "Section 4(f) of the Department of Transportation Act of 1966 states that a transportation program or project requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance can be approved only if there is no prudent and feasible alternative to using that land and if the program or project includes all possible planning to minimize harm resulting from the use to the park, recreation area, wildlife and waterfowl refuge, or historic site." (DEIR/EIS/EA, p. 6-13). The DEIR/EIS/EA dismisses the underlined disclaimer through a lengthy Appendix which concludes the trails within the 64-acre Tract are not subject to this protection because they are considered jointly planned with this project,[53] and the impacts to adjacent trails are proposed as 'de minimis' under Section 4(f) provisions.[54]

> This appendix documents the Federal Highway Administration's (FHWA) intent to make a Section 4(f) de minimis use determination for the use of trails within the Tahoe City Public Utility District (TCPUD) multi-use trail system; a final de minimis determination will not be made until after public review of the environmental document. Also, included in this appendix is a discussion of other potential Section 4(f) properties evaluated relative to the requirements of Section 4(f), including a discussion of the 64 Acre Tract. (Appendix F, p. 1)

Exclusion of the trails on the 64-acre Tract:

Although the project has been 'listed' in various plans for many years, no environmental analysis of the bypass, alternatives, and other impacts has been completed. The proposed project's purpose and need have been expanded well beyond the original purpose and need for this project, and as noted, for the most part, no longer apply. It is therefore questionable that the recreation impacts to the 64-acre Tract can be excluded for this reason. The EIR/EIS/EA must clearly explain the justification for this exemption.

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any potential flooding events would be the result of a controlled release of water from the Tahoe dam, and because access to the bike path would be closed by Tahoe City Public Utility District prior to any such release, the portions of the bike path within the 100 year flood zone would not expose users to a significant risk of injury or death from flood hazards. (DEIR/EIS/EA, p. 4.7-29)

[53] Because trails within the 64 Acre tract are considered jointly planned with the proposed project, trails within the 64 Acre Tract are not included in the acreage given for Section 4(f) use; however, in order to describe trail system connectivity issues, they are included in the text discussion here. (App. F, p. 2)

[54] As described in the Section 4(f) Report (Appendix F of this document), Federal Highway Administration (FHWA) finds that use of existing trails on the project site that are within the Tahoe City Public Utility District (TCPUD) multi-use trail system would be de minimis under Section 4(f) provisions. (DEIR/EIS/EA, p. 6-13).

Proposed "de minimus" finding for adjacent recreation impacts:

Section 4(f) of the Department of Transportation Act of 1966 codified in Federal law at 49 USC §303, declares that "[i]t is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites."

> Section 4(f) specifies that "[t]he Secretary [of Transportation] may approve a transportation program or project…requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if –
>
> (1) there is no prudent and feasible alternative to using that land; and
>
> (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use."
>
> Section 4(f) further requires consultation with the Department of the Interior and, as appropriate, the involved offices of the Departments of Agriculture and Housing and Urban Development in developing transportation projects and programs which use land protected by section 4(f).
>
> In general, a section 4(f) "use" occurs with a DOT-approved project or program when 1) section 4(f) land is permanently incorporated into a transportation facility; 2) when there is a temporary occupancy of section 4(f) land that is adverse in term of the section 4(f) preservationist purposes as determined by specified criteria (23 CFR §771.135[p][7]); and 3) when section 4(f) land is not incorporated into the transportation project, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for protection under section 4(f) are substantially impaired (constructive use) 23 CFR § 771.135(p)(1) and (2).
>
> Section 6009(a) of SAFETEA-LU amended Section 4(f) legislation at 23 United States Code (USC) 138 and 49 USC 303 to simplify the processing and approval of projects that have only *de minimis* impacts on lands protected by Section 4(f). This revision provides that once the U.S. Department of Transportation (USDOT) determines that a transportation use of Section 4(f) property, after consideration of any 1 avoidance, minimization, and mitigation or enhancement measures, results in a *de minimis* impact on that property, an analysis of avoidance alternatives is not required and the Section 4(f) evaluation process is complete. FHWA's final rule on Section 4(f) *de minimis* findings is codified in 23 Code of Federal Regulations (CFR) 774.3 and CFR 774.17. (App. F, p. 2)

The DEIR/EIS/EA proposes a *'de minimus'* finding for these impacts, however, the criteria for making this finding have not been met, as follows (note the same arguments apply to the 64-acre Tract area as well):

> *Feasible and prudent avoidance alternative.*
> (1) A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.
> (2) An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.

As Alternatives 6 and 6a can be built, those alternatives are feasible.

> (3) An alternative is not prudent if:
> (i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
> (ii) It results in unacceptable safety or operational problems;

The DEIR/EIS/EA concludes Alternatives 6 and 6a have a less than significant impact on Long Term access for emergency services,[55] therefore these alternatives do not result in 'unacceptable safety' problems. In addition, we reiterate that with regards to safe access for emergency vehicles, the proposed bypass in Alternatives 1-4 ends in *two lane* highways. Therefore, although emergency access may improve to and from the 64-acre Tract, other services will have to continue to drive down two-lane highways. In the larger picture, it is very unlikely that most emergency services will be confined to the 64-acre Tract compared to the entire West Shore.

In addition, we suggest there are alternatives available which have not been considered. For example, during an emergency situation such as a fire on West Shore, and given the documentation that the pedestrian signal across the highway next to Fanny Bridge is part of the reason for the congestion of traffic along S.R. 89 South, an option to improve flow in this limited area of congestion could include an officer being placed at the pedestrian signal and regulating the free-flowing crossing of the highway as needed for emergency vehicles.

The DEIR/EIS/EA also concludes that the long term operations impacts to public access and mobility are actually beneficial under Alternatives 6 and 6a.[56]

In summary, alternatives 6 and 6a are both 'prudent' and therefore, the de minimus determination of Alternatives 1-4 is not justified. The EIR/EIS/EA must clearly disclose the justification for such conclusions.

IX. Greenhouse Gas (GHGs) Emissions

The DEIR/EIS/EA concludes the project will have a less-than-significant impact on GHG emissions, claiming it "would not result in an increase in GHG emissions relative to existing conditions."[57] As noted in our comments on the transportation impacts, the conclusion that the project will not increase VMT or vehicle trips is not supported by

[55] "Impact 4.12-5. Long-term access for emergency services:
Alternative 6…would be less than significant…Alternative 6a…would be less than significant." (DEIR/EIS/EA 4.12-16)

[56] Impact 4.13-2. Long-term impacts on public access to the Truckee River, recreational trails, 64-Acre Tract, or Fanny Bridge area.
"…in the long-term Alternative 6 [and 6a] would result in increased public access, and thus, a beneficial impact. (DEIR/EIS/EA, p. 4.3-20)
Impact 4.15-6. Mobility and operations-related impacts.
"…implementation of Alternative 6 [and 6a] would result in a beneficial impact…" (DEIR/S.EA, p. 4.15-49)

[57] ENVIRONMENTAL EFFECTS OF THE PROJECT ALTERNATIVES
Impact 4.6-1. GHG emissions and consistency with the Regional Transportation Plan.
Implementation of the project alternatives would not result in an increase in VMT or associated mobilesource GHG emissions, and implementation of the action alternatives would be consistent with implementation of the RTP/SCS, which aims to achieve targets assigned by the RTAC for mobile-source GHGs. Also, construction-related GHG emissions would be less than significant for all the action alternatives. Implementation of the No Action Alternative (Alternative 5) would retain existing traffic conditions, including existing levels of congestion and traffic flow but would not result in an increase in GHG emissions relative to existing conditions. Therefore, this would be a less-than-significant impact. [Emphasis added] (DEIR/EIS/EA, p. 4.6-16)

evidence. In fact, available information indicates the project will *increase* traffic and VMT, which will *increase* GHG emissions. This was previously acknowledged by the TRPA/TMPO as noted in the 2008 Mobility 2030:

> Projects included in the "increase" greenhouse gas emissions category are those that create capacity increases for motor vehicles. These capacity increases are still quite small, compared to those planned in larger, urban areas, but they create additional lane capacity for several thousand feet of roadway in order to alleviate reoccurring congestion at key points. [Emphasis added] (Regional Transportation Plan - Mobility 2030, FINAL August 27, 2008 p. 71-72)

Figure 6.6. Regional Transportation Plan Project Strategies, Costs, and Greenhouse Gas Emission Effects

Project Strategies	Reduce GG	Increase GG	Unclear	Total
U.S. 50 Bicycle and Pedestrian Improvement Project(s)	$48,000,000			$48,000,000
Kings Beach Commercial Core Improvement Project	$50,000,000			$50,000,000
State Route 89 Realignment Project		$50,000,000		$50,000,000
Tahoe City Transit Center	$7,000,000			$7,000,000
U.S. 50 Stateline Corridor Project			$65,000,000	$65,000,000
Waterborne			$14,000,000	$14,000,000

The document also states:

> Exempt projects generally include projects that will not increase roadway capacity or VMT, safety improvements, maintenance of existing transit systems, such as bus replacement and the addition of bus shelters to be implemented in the Lake Tahoe Region. The following non-exempt projects have been identified for the Tahoe Region. [Emphasis added]
>
> State Route 89/Fanny Bridge Community Revitalization Project – Scheduled for completion in 2018 this project addresses seasonal traffic congestion at the Tahoe City Wye in Placer County and the structural and seismic deficiencies of Fanny Bridge on the Truckee River. Fanny Bridge will be upgraded to provide improved pedestrian and bicycle safety with a new SR 89 alignment through the 64-acre United States Forest Service parcel located west of the existing State Route 89. (Mobility 2035. p. E-3)

As a result, the DEIR/EIS/EA fails to adequately analyze the impacts of increased GHGs from each alternative.

After the transportation analysis has been revised to clearly identify the impacts of each alternative, the GHG emissions must be evaluated and clearly disclosed in the EIR/EIS/EA.

X. Utilities – Truckee River Interceptor (TRI) Line

The Tahoe-Truckee Sanitation Agency included four pages related to the potential environmental impacts of Alternatives 1-4 that the DEIR/EIS/EA needed to analyze (see App. B, Scoping Report, p. 118-123). Impacts and concerns include, but are not limited to, detailed information about the importance of maintenance of the line at all times, the challenges to preventing raw sewage from spilling into Lake Tahoe or the Truckee River, the impacts of placing the roundabout over existing manholes, the detrimental impacts associated with raising the highway up to ten feet on the river overpass, and possible impacts to the gravitational flow of the current system.

These are serious concerns for which the DEIR/EIS/EA utterly fails to respond to. The only apparent response appears to be the following in the Utilities Chapter, a section which includes minimal, generic discussion about contractors dealing with utilities:

> Construction activities associated with the action alternatives include grading and other earthmoving activities. Realignment of the T-TSA TRI sewer line and modifications to the NSEF sewer export main is included as part of Alternatives 1 through 4 to accommodate the transportation improvements. Identification and location of all other known underground utility lines is a required standard condition of construction approvals. Therefore, construction contractors would be able to avoid potential conflicts with existing utility services. Thus, this impact would be less than significant for Alternatives 1, 2, 3, 4, 6, and 6a. There would be no impact under Alternative 5. (p. 4.12-9) [Emphasis added].

The EIR/EIS/EA must assess and disclose the potential impacts identified by the Tahoe-Truckee Sanitation Agency.

XI. Noise Impacts

The EIR/EIS/EA notes that for the FHWA and Caltrans analysis, a substantial increase in noise occurs when the hourly estimated noise energy, or Leq[58], is increased by 12 dB. The noise analysis in Appendix E estimates increases in traffic noise, noting none exceed this value, and therefore*: "…no noise abatement measures were proposed at any locations in the project area.*"[59] TRPA's noise standards are based on the 24-hour noise

[58] "Equivalent Continuous Sound Level (Leq): Leq represents an average of the sound energy occurring over a specified period. In effect, Leq is the steady-state sound level containing the same acoustical energy as the time-varying sound that actually occurs during the same period. The 1-hour A-weighted equivalent sound level (Leq[h]) is the energy average of A-weighted sound levels occurring during a 1-hour period and is the basis for noise abatement criteria (NAC) used by Caltrans and Federal Highway Administration (FHWA)." (DEIR/EIS/EA, p. 4.10-4)

[59] "The build alternatives would create some noise level changes over No Build Alternative. The maximum increase associated with build alternatives would be 4.2 dB and 4.4 dB under Alternative 4 (2018), and Alternative 4 (2038), respectively, which is below the Caltrans definition of a substantial increase (12 dB). Based on the Protocol and relevant noise abatement criteria used by Caltrans and the Federal Highway Administration, no noise abatement measures were proposed at any locations in the project area. The proposed project would not expose any locations to a higher noise level under any of the build alternatives in 2018 and 2038, over the existing and the No-Build Alternative conditions. No noise abatement measures are evaluated in this report; therefore, preparation of a noise abatement decision report is not required." (Appendix E, p. iii-iv).

energy standard (CNEL), where noise is weighed more heavily during typically sensitive hours (e.g. overnight).[60] The threshold for all receivers in the project area is 55 CNEL.

Noise studies based on inadequate traffic analysis:

As noted, the EIR/EIS/EA erroneously concludes there will be no increase in traffic from the proposed bypass. This failure infects the noise analysis which relies heavily on traffic data. The EIR/EIS/EA must include a revised noise analysis based on appropriate traffic information.

TNM model not appropriate:

Use of the TNM model[61] is insufficient to account for local site conditions, including weather, which can have a significant impact on acoustics. As noted in the *Technical Noise Supplement* (TeNS) *to the Traffic Noise Analysis Protocol*[62] *(*notably used to guide the Noise Study Report for the EIR/EIS/EA[63]), there are several limitations to the model:

> **N-5420 Limitations**
> Highways constructed along new alignments and profiles do not lend themselves to model calibration. The site before project construction does not include the new highway. Ambient noise levels are generated by typical community noises, such as surface street traffic, lawn mowers, air conditioners, barking dogs, etc. These are impossible to model.
>
> Also, the site and source characteristics change substantially after the project, making model calibration meaningless, even if it were possible. Similarly, highway reconstruction projects which significantly alter alignments and profiles of an existing highway are also poor candidates for model calibration. [Emphasis added] (TeNS, Subsection N-5420).
>
> **N-5430 Pertinent Site Conditions**
> Group 2 - Site conditions that CANNOT be accounted for by the model, and are therefore ignored, even though they affect the local noise environment. They include but are not necessarily limited to:
>
> · Pavement types and conditions. The model has no provisions to deal with these.
> · A typical (or nontypical) vehicle noise populations. The California Vehicle Noise Emission Levels (Calveno) are statewide averages. Individual sites may have vehicle noise sources that deviate significantly from Calveno.
> · Transparent shielding (noise transmission through material is significant: i.e. low transmission loss). Examples of this type of shielding are wood fences with shrinkage gaps (noise leaks), areas of heavy brush or trees.
> · Reflections off nearby buildings and structures.
> · Meteorological conditions. [Emphasis added]. (TeNS, Subsection N-5430).

[60] Community Noise Equivalent Level (CNEL) or Day-Evening-Night Level (Lden): Similar to Ldn, CNEL or Lden is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10-dB penalty applied to A-weighted sound levels occurring during the nighttime hours between 10 p.m. and 7 a.m. and a 5-dB penalty applied to the A-weighted sound levels occurring during evening hours between 7 p.m. and 10 p.m. (DEIR/EIS/EA, p. 4.10-4)

[61] "CNEL or Day Evening Night (Lden) noise levels were predicted using TNM 2.5 for 2018 and 2038 No-Build and build alternatives:" (Appendix E, p. 119)

[62] http://www.dot.ca.gov/hq/env/noise/index.htm

[63] "A field noise study was conducted in accordance with recommended procedures in the Caltrans TeNS document (Caltrans 2009)" (Appendix E, p. 40);

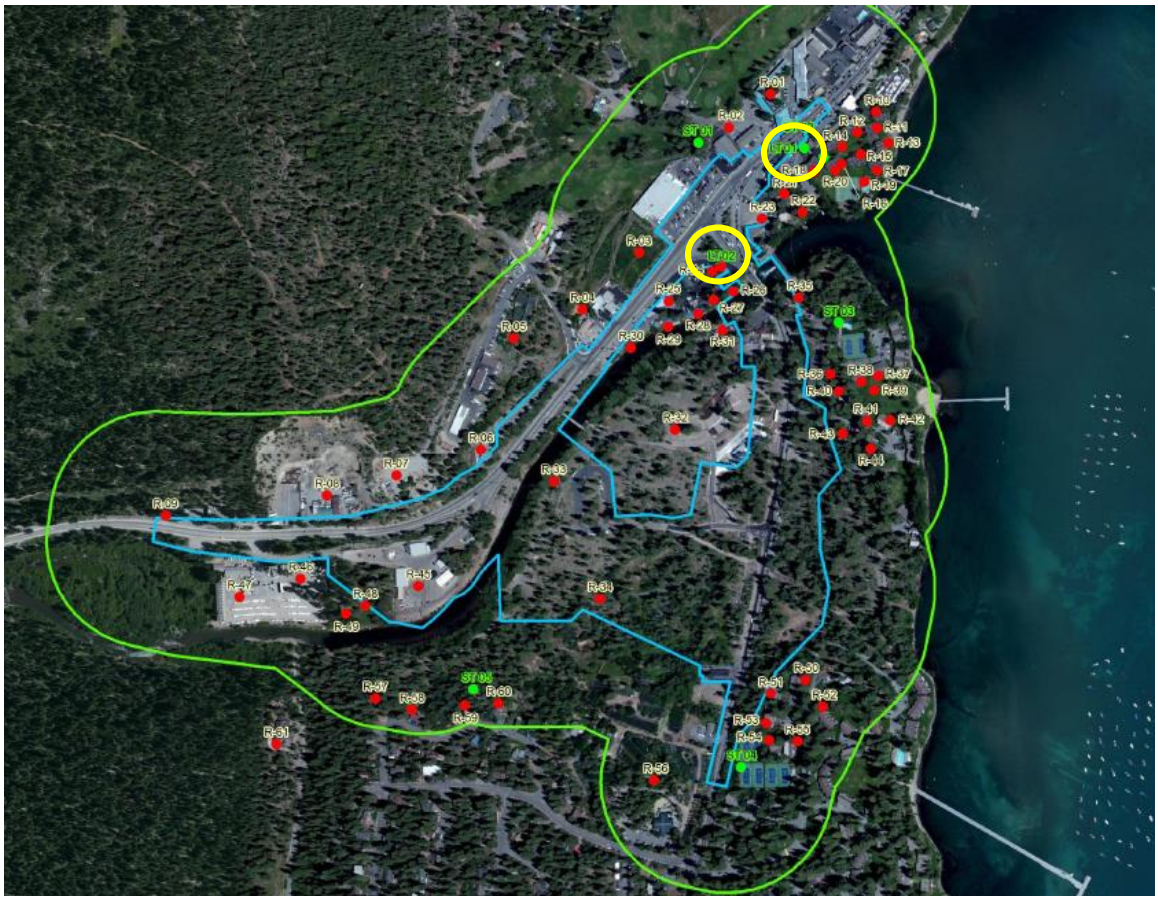
> Meteorology is one of the major problems in Group 2 site conditions. The effects of wind speed and direction on noise levels at a receiver can be substantial, even at relatively short distances from a highway. Since the prediction model does not take meteorology into consideration, noise measurements have to be taken under calm wind conditions. Section N-3600 discussed the criteria for calm winds. Any attempt to calibrate the model for a prevailing wind condition is only valid for that wind condition. Noise standards, however, are not linked to meteorology. [Emphasis added] (Caltrans Technical Noise Supplement, p. N-114)

Monitoring sites/calibration of model:

Not only is the model inappropriate for use with realignment projects, but the extremely limited 'measurements' and sites used to calibrate the model are so minimal[64] that calibration is questionable.

First, the locations for the "long-term" measurement sites are both confined to the area in the immediate vicinity of the existing Wye (circled in yellow below). These two sites, neither of which are situated near the new bypass (LT-01 and -02), fail to provide information to calibrate the existing or future conditions in the area where the new bypass will be constructed. In fact, to say there were two "long-term" sites is misleading, since LT-01 represents measurements for just thirteen hours during one summer peak time period (and LT-02 is a similar site monitored in the winter months). That means the model - *which was used to forecast summer peak hour noise levels over twenty years into the future* – was calibrated based on just thirteen hours in one location. The analysis also relied on 'modeled' traffic values to fill in the other 11 hours, in essence using an estimated modeled value to calibrate a model. The point of calibrating a model is to use **measured** data to determine how well the model forecasts conditions. Further, the analysis includes no information regarding the other factors which may affect the traffic noise at this time.

[64] Five short-term (ST) noise measurement locations were selected to represent the major developed area within the project area along the existing portion of the project roadway segments. Two long-term (LT) measurement sites were selected to capture the diurnal traffic noise level pattern in the project area. The short-term measurement locations were selected to serve as representative modeling locations at noise sensitive areas. An additional 61 non-measurement locations were selected as modeling locations. In total, 67 receiver locations were modeled to represent the noise sensitive land uses in the project vicinity. The monitoring and modeled receiver locations are shown in Figure 5-1. (Appendix E, p. 39).



The wintertime traffic-related noise levels, which are shown to be higher than the summertime measurements (App. E, p. 50), are based on *one* 24-hour period in January 2014. No information is provided regarding the weather, or the adequacy of this time period to represent peak winter conditions. For example, peak traffic conditions in the winter tend to be associated with ski traffic, yet the time period (January 10-11, 2014) occurred when the snow pack was at less than 20% its average.[65] Ski resorts were struggling to make snow, opening very few runs, and visitation was down. This period also did not occur on a Holiday. This does not appear to represent the noise during **peak** winter traffic conditions.

Short term measurements were only taken for 15 minutes during one time period.[66] In addition, only one "short term measurement" (ST-05) site was located in the residential area that will be impacted by the new alignment. No evidence is provided to suggest the noise during this short period of time is indicative of noise levels year round and under variable conditions.

The EIR/EIS/EA must include substantial noise measurements during both summer and winter peak times, for at least 24-hour periods, at least four times per season.

[65] http://sacramento.cbslocal.com/2014/01/03/sierra-snow-survey-20-percent-january-2013/

[66] Five short term (15-minute) noise measurements were conducted at representative receiver sites, classified as Activity Categories B, C, and E within the project area, on Thursday and Friday, July 5 and July 6, 2012, between 7:00 a.m. and 6:30 p.m. when traffic was free-flowing. (Appendix E, p. 40).

Noise impacts to humans and wildlife will be permanent, and must not be taken lightly or dismissed. Impacts must be evaluated with regards to topography/slope to receptor, weather conditions, highway conditions (e.g. if chains are required, there will be more noise), and other factors affecting how noise travels and impacts humans and wildlife. Noise monitoring (not modeling) must to include the residential areas adjacent to the new bypass and the impacts to the 64-acre Tract.

XII. Cumulative Impacts

VMT and Vehicle Trips:

The EIR/EIS/EA fails to evaluate and disclose the cumulative transportation-related impacts of the project. Instead, the EIR/EIS/EA attempts to tier from the 2012 RTP/SCS EIR/EIS.[67] Yet the RTP/SCS EIR/EIS simply listed the project. No detailed information was provided regarding the potential impacts of the Fanny Bridge project. In other words, there was no cumulative analysis of the project, or its impacts taken collectively with other reasonably foreseeable projects. The DEIR/EIS/EA cannot tier from an analysis that does not exist.

The DEIR/EIS/EA inappropriately relies on one mitigation measure in the RPU/RTP to conclude there will be no cumulatively significant impacts on VMT:

> Because the SR 89/Fanny Bridge Community Revitalization Project is included within the traffic analysis in the Regional Plan Update and this analysis, the project would contribute to a cumulatively significant impact, before consideration of mitigation. TRPA adopted Mitigation Measure 3.3-3: Implement Additional VMT Reduction, in response to the shortfall in reaching the VMT reduction goal. Under this mitigation measure, TRPA developed a program for the phased release of land use allocations, followed by monitoring and forecasting of actual roadway traffic counts and VMT. New development allocations will be authorized for release by the TRPA Governing Board every four years, beginning with the approval of the Regional Plan in 2012. Approval of the release of allocations is contingent upon demonstrating, through modeling and the use of actual traffic counts, that the VMT Threshold Standard will be maintained over the subsequent four-year period. This mitigation measure was established as TRPA Code Section 50.4.3. As a result of this requirement, the project would not contribute to a cumulatively significant impact. (DEIR/EIS/EA, p. 5-7)

First, this conclusion is not supported for the reasons stated below regarding the VMT per capita assessment. Second, the noted mitigation measure does little to ensure mitigation of VMT. The RPU contains numerous loopholes and allowances that allow existing

[67] TRPA and the Tahoe Metropolitan Planning Organization (TMPO) prepared a program EIR/EIS for the environmental review and approval of the Lake Tahoe Regional Transportation Plan (RTP, also known as *Mobility 2035*) and Sustainable Communities Strategy (SCS, for the California portion of the Lake Tahoe Region) (TMPO and TRPA 2012). This program-level document provides a regional consideration of cumulative effects and includes broad policy alternatives and program mitigation measures that are equally broad in scope. Because the approved RTP/SCS EIR/EIS includes the proposed SR 89/Fanny Bridge Community Revitalization Project, some of its environmental effects, including cumulative effects, have been considered at the program level. Thus, this EIR/EIS/EA incorporates the RTP/SCS EIR/EIS by reference. It is available for review on the TMPO's webpage (http://tahoempo.org/Mobility2035/) and summarized in this document, where appropriate. (DEIR/EIS/EA, p. 4-2).

development to be transferred and converted to/from CFA, TAUs, ERUs, etc.[68], morphed into larger sizes[69], doubled, tripled, and in some cases allowed to make six times the development footprint from certain transfers[70] - *all without requiring new allocations*. Thus, limiting the release of "new" allocations will have minimal impacts compared to the extensive increases in development that are already allowed through regulations associated with existing development. In addition, as noted in our comments on the DEIS and FEIS for the RPU, TRPA has failed to determine how it will reduce VMT to achieve the threshold for over twenty-five years; the RPU and RTP contain no additional measures for reducing VMT other than the phased release of new allocations (which as noted, does not account for the transfers/conversions/morphing allowed by the RPU).

In addition, as Caltrans traffic counts show, the existing infrastructure has accommodated thousands more Average Daily Vehicles in the past; *nothing has been changed to reduce the capacity that already exists*. Other factors, such as economic changes, weather related changes, the deterrence due to peak hour congestion on S.R. 89, and population changes have impacted the AADV. The RPU already calls for significant increases in local residential populations for the Basin,[71] and the RPU's strategies increase the size of TAUs (thereby allowing more visitors per unit),[72] allow more conversions, and increase resort development through the inclusion of new Resort Recreation District rezoning[73] will result in more visitors. The RTP's own estimates show that over 90% of Tahoe's visitors drive here.[74] These increases in residents and visitors could alone bring the AADV levels back to their highest amounts (mid-1990's) without any changes to existing infrastructure. Increasing the capacity of S.R. 89 will only allow for *even more* vehicles on the highway. The DEIR/EIS/EA fails to analyze this potential impact, and includes no proposed safeguards to mitigate future congestion facilitated by the project. As noted in NOP comments by the League to Save Lake Tahoe (LTSLT) and Tahoe Area Sierra Club (TASC), *"…the project must have safeguards in place to mitigate any future congestion facilitated by the project, and thus must include the current maximum worst-case traffic scenario*." (1/30/2012).

The Final EIR/EIS/EA must include this analysis and sufficient mitigation measures for the increased VMT.

VMT per capita:

The DEIR/EIS/EA relies on the RTP/SCS to conclude no 'considerable contribution to a significant cumulative impact' for VMT per capita.[75] However, the RTP/SCS includes no specific information about the impacts of this project, and the DEIR/EIS/EA does not

[68] Code of Ordinances, Chapter 50
[69] Code of Ordinances, Chapter 51, Section 51.5.2.K.2
[70] Code of Ordinances, Chapter 30, see TABLE 30.4.4-1: TRANSFER RATIOS
[71] See TRPA RPU DEIS, p. 3.3-29, Table 3.3-8. Population Totals for 2020 and 2035 for Project Alternatives
[72] See Code of Ordinances, Chapter 50, Section 50.10
[73] See TRPA RPU FEIS, Volume 1, p. 2-3, Section 2.2.3, Resort Recreation Designation
[74] Mobility 2030: Transportation Monitoring Program 2010 (TRPA 2010, pp. 12-14); also, RTP/SCS DEIR/S, p. 3.3-9
[75] Under the adopted RTP/SCS, VMT per capita would decrease. Thus, the project's contribution to any change in VMT per capita would not result in a considerable contribution to a significant cumulative impact. (DEIR/EIS/EA, p. 5-4)

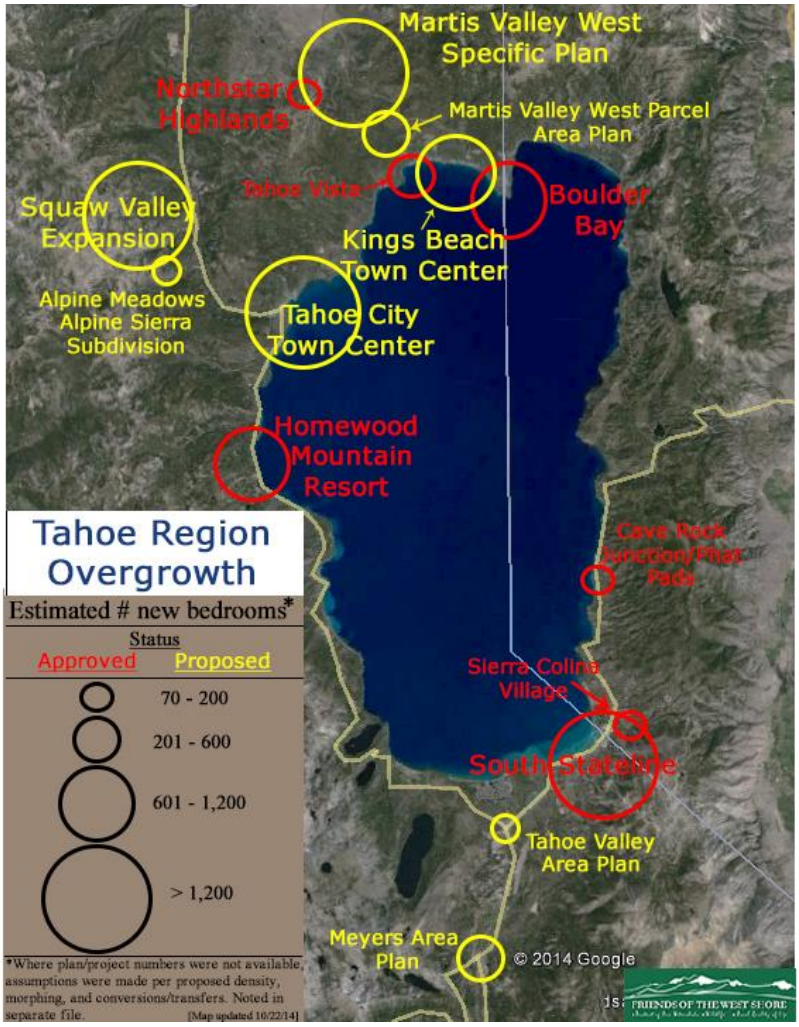
analyze the potential increases in VMT per capita because the EIR/EIS/EA has made the erroneous claim that the project will not result in increased vehicle trips or VMT. Until this error is corrected and an adequate analysis is performed, there is no evidence upon which to conclude the Fanny Bridge/SR 89 project will not generate cumulative impacts on VMT per capita. Further, there is no evidence presented regarding the cumulative "benefits" (or rather, reductions in VMT per capita) due to the changes in pedestrian and biking infrastructure. In fact, as noted in our comments on the recreation section, there is a significant gap in the DEIR/EIS/EA's analysis of impacts to recreation (and therefore, pedestrians and bicyclists) for the proposed alternatives which include the bypass. As a result, there is no information suggesting anyone will be more apt to get out of their vehicle to walk or bike under Alternatives 1-4 compared to existing conditions or Alternatives 6 and 6A.

The Final DEIR/EIS/EA must adequately analyze the impacts of the increased trip generation/induced travel, as well as the impact of the alternatives on non-motorized use, both on Fanny Bridge and through the 64-acre Tract recreation area.

Cumulative impacts of reasonably foreseeable projects:

The cumulative impacts section fails to analyze the impacts of reasonably foreseeable projects. Simply listing the projects[76] does not provide a substitute for analyzing their potential cumulative impacts. Even at a rough scale, one can estimate the potential increases in traffic from new (or redeveloped/expanded) units in and around the project area. For example, the following map estimates the potential new bedrooms in the region from approved/not-yet-built and proposed projects and plans:

[76] The following discussion addresses the cumulative impacts associated with implementation of the project alternatives in combination with other past, present, and reasonably foreseeable related projects. The cumulative impacts described below are limited to those significant environmental impacts that would occur related to implementation of one or more of the alternatives evaluated in this EIR/EIS and that were not otherwise previously analyzed in the RTP/SCS EIR/EIS (see Section 5.1.4). Impacts determined to result in less-than-significant or beneficial impacts were determined to not have the potential to result in an incremental contribution to a significant cumulative impact. Thus, resources sections that are not discussed below consist of: air quality; geology, soils, land capability, and coverage; greenhouse gas and climate change; hydrology and water quality; land use; and public services and utilities. (DEIR/EIS/EA, p. 5-7).



As the regional planning agency for Lake Tahoe, the TRPA should, at a minimum, have the information available to estimate potential increases in traffic. Further, as the RPU/RTP's mitigation for VMT and LOS impacts is only tied to *new* development allocations, the impacts of transfers, conversions, and morphing of existing uses must be evaluated. Notably, the new bedrooms in the estimated map above are tied to potential land use changes (discussed above), not new allocations. For example, Placer County is currently pursuing the purchase of 93 hotel rooms (TAUs) in South Shore, which would be converted into 279 hotel rooms in Placer County[77] – a net increase of 186 hotel rooms (TAUs) that do not require new allocations from TRPA, meaning they are not subject to the mitigation measure in the RPU/RTP. Such a transfer would also move traffic from the South Shore area to Tahoe City- another factor which must be addressed in the transportation analysis.

The EIR/EIS/EA must examine and disclose the cumulative impacts of reasonably foreseeable developments in the local and regional area.

[77] http://www.bizjournals.com/sacramento/news/2014/12/11/potential-hotel-development-swap-causing-ire.html?page=all

Lake Tahoe Basin Bike Trail Survey

July 2007

FINAL May 29, 2008

TCORP

Tahoe Coalition of Recreation Providers

Contents

Trail users in South Lake Tahoe

Introduction to the Survey

In July 2007 the Tahoe Coalition of Recreation Providers (TCORP), in cooperation with the Tahoe Regional Planning Agency (TRPA) and other Basin agencies, carried out a Bicycle Trail User survey. The basic survey was first developed by TCORP and the Tahoe-Baikal Institute (TBI) in 1997 with three major goals in mind:

1. to gain a better understanding of the needs and wants of bike trail users so that future project planning can better incorporate these concerns;
2. to help establish a set of user data that can be used by recreation providers seeking funding for future bike trails around the Basin; and
3. to better establish the quality of user's overall recreational experience while using the bike trail.

The bicycle trail user survey was repeated in 2007, as part of an enhanced transportation monitoring program that resulted from the Pathway 2007 planning process. This bicycle trail user survey is one of three on-going Basin surveys that attempts to gather data about non-auto travel in the Lake Tahoe Basin. The other two surveys are the Lake Tahoe Recreation and Commercial Area Travel Mode Surveys[1]. The goals of all three of these surveys are to track changes in travel patterns over time, and to determine whether projects and programs intended to reduce dependency on the private automobile are working. This year's bicycle trail user study had a strong focus on user counts in order to track changes in trail patronage over time.

To be able to compare the data with the data set of 1997, most of the old questions were included in the new survey. However, a few questions were altered to achieve clearer results. Also, four more survey locations were added based on near-term planned bike trail improvements in those areas.

Participating organizations in 2007:

- California Tahoe Conservancy (CTC)
- City of South Lake Tahoe (CSLT)
- EDAW
- El Dorado County (participated in the planning but was unable to provide volunteer surveyors due to the Angora Fire)
- Incline Village General Improvement District (IVGID)
- Karen Mullen-Ehly, Inc.
- Lake Tahoe Bicycle Coalition
- Nevada Department of Transportation (NDOT)
- Nevada State Parks
- Tahoe City Public Utility District (TCPUD)
- Tahoe Regional Planning Agency
- Washoe County

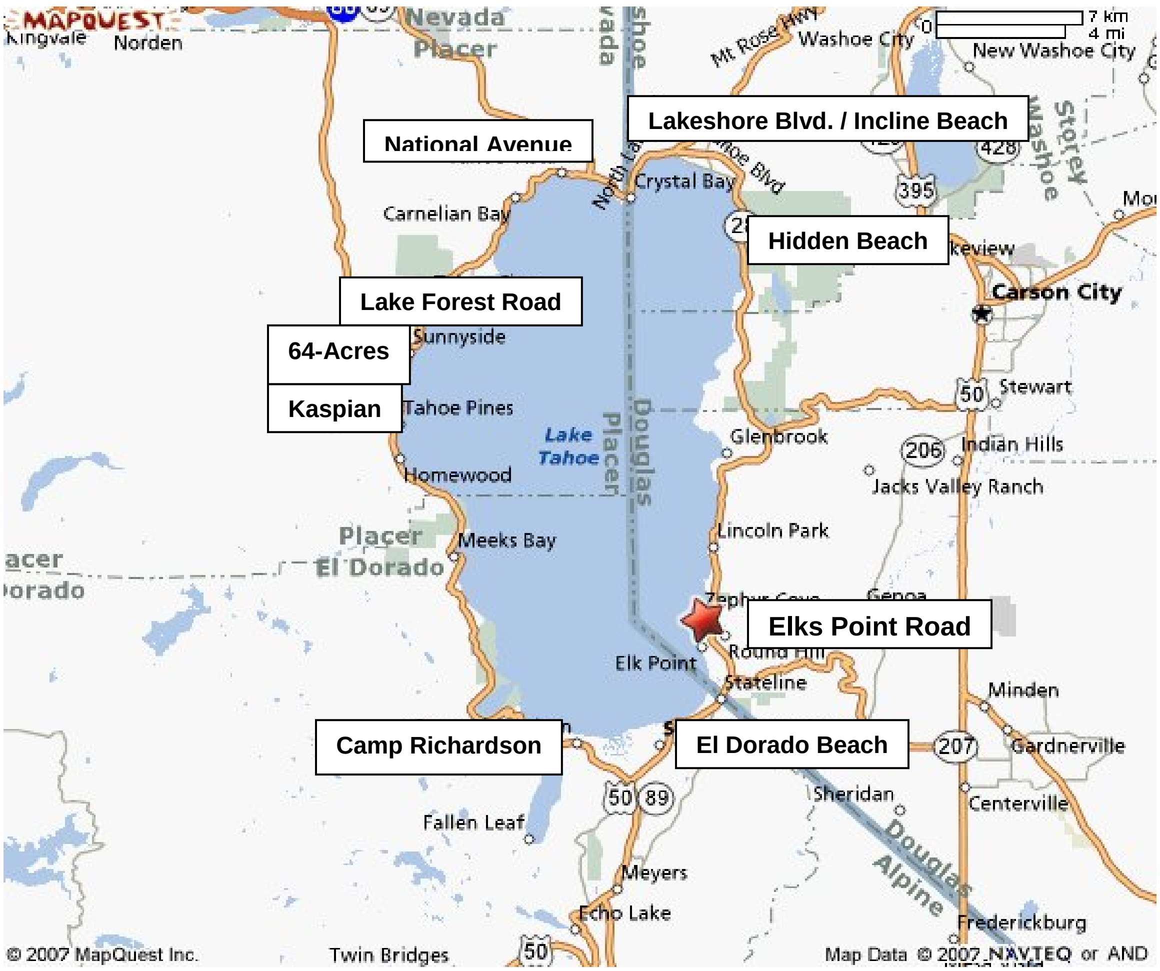
[1] These can be found on the Tahoe Regional Planning Agency's website at http://www.trpa.org under "Other Documents".

Survey Locations

All surveys were conducted on Thursday, July 5, 2007 between the hours of 10:00 a.m. and 2:00 p.m[2]. Survey interviews and user counts were conducted at nine locations. Most of the survey locations were on established shared use paths, but three were in areas where future bicycle routes are planned, and thus took place near the highway or on sidewalks:

• **TCPUD's Truckee River Trail at 64-Acre Tract** (shared use path)	➢ Approximately 200 yards north of the vehicle entrance to 64-Acres at the intersection of the West Shore Trail and the Truckee River Trail;
• **TCPUD's West Shore Trail at Kaspian** (shared use path)	➢ At the USDA Forest Service (USFS) Kaspian picnic facility at bathrooms
• **USFS Bike Trail at Camp Richardson** (shared use path just outside of South Lake Tahoe)	➢ Next to the Camp Richardson Resort sign, with the bear. On the highway side of the bike path.
• **Lakeshore Boulevard Path in Incline Village** (shared use path)	➢ At the entrance to Incline Beach
• **CSLT Bike Trail at El Dorado Beach** (shared use path)	➢ Hwy 50 at Lakeview, approx. 150 feet east of the intersection, on the bike path at El Dorado Beach
• **Nevada State Parks Hidden Beach path on the East Shore of Lake Tahoe** (dirt footpath)	➢ Hidden Beach North Trailhead by Nevada State Park Signage
• **Elks Point Road near Nevada Beach, in Douglas County** (this is near the Nevada Beach Shared Use Path, but actual surveys were conducted where there is no path)	➢ Northwest corner of the Elks Point Road/U.S. 50 intersection on the sidewalk.
• **National Avenue in Tahoe Vista** (sidewalk only)	➢ In front of the recreation area/boat launch at National Ave. in Tahoe Vista and SR28, on the lakeside.
• **TCPUD Trail at Lake Forest Road and SR 28 west of Tahoe City** (shared use path)	➢ At SR28 and Lake Forest Rd (the north end of Lake Forest Rd) just before the shared use path climbs to Dollar Hill

[2] El Dorado County collected user counts at the intersection of US Hwy 50 and Santa Fe Road in Meyers, at the beginning of the new Sawmill bicycle path, on different days and times. See Appendix G for these results.



National Avenue
Lakeshore Blvd. / Incline Beach
Hidden Beach
Lake Forest Road
64-Acres
Kaspian
Elks Point Road
Camp Richardson
El Dorado Beach
Lake Tahoe
Carnelian Bay
Crystal Bay
Sunnyside
Tahoe Pines
Homewood
Meeks Bay
Glenbrook
Lincoln Park
Elk Point
Stateline
Carson City
Stewart
Indian Hills
Jacks Valley Ranch
Minden
Gardnerville
Centerville
Sheridan
Fallen Leaf
Meyers
Echo Lake
Twin Bridges
Frederickburg
Washoe City
New Washoe City
Norden
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Methodology

Prior to surveying, the twenty volunteers were given training on survey techniques. Surveyors were instructed to politely ask only one adult person of each travel party to fill out a survey form. To ensure randomization of the survey, volunteers were instructed to ask everyone who passed on the trail to take the survey, regardless of their demeanor, gender, speed of travel, or whether or not they were talking on a cell phone. In cases where there was very high use, the surveyors were instructed to ask every third travel party to take the survey and not to deviate from this sample rate. Appendix D shows a sample survey.

Additionally, surveyors were asked to keep a running tally of trail users over a fixed time during peak day usage. Walkers (including wheelchair users) and bikers were to be counted separately. All other modes of transportation were counted as "other". Trail users were counted every time they passed, in both directions.

At each survey site, the volunteers were equipped with pencils, clipboards, surveys, counting sheets, and tables. (See Appendix C for a complete list of materials and surveyor instructions).

Cyclist in South Lake Tahoe

Summary of Results

In total, 365 fully or partially completed surveys were collected:

Location	# of completed surveys
64-Acre Tract:	89 surveys
Kaspian:	29 surveys
Camp Richardson:	45 surveys
Incline Beach:	30 surveys
El Dorado Beach:	60 surveys
Hidden Beach:	32 surveys
Elks Point Road:	12 surveys
National Avenue:	22 surveys
Lake Forest Road:	46 surveys
Total	365 surveys

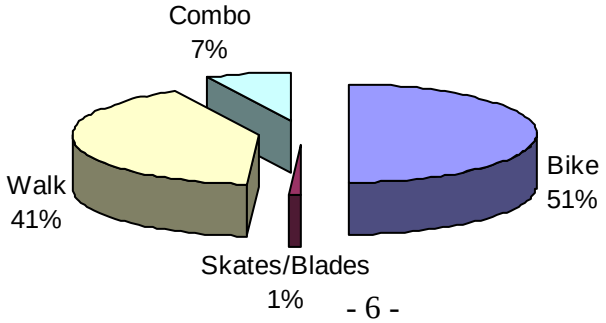
The average "users per hour" was the highest at Camp Richardson and the lowest at National Avenue.

Location	Average Users per Hour	Total Count
Camp Richardson:	224 users	(896 in 4 hours)
Incline Beach:	217 users	(867 in 4 hours)
64-Acre Tract:	151 users	(605 in 4 hours)
Kaspian:	93 users	(370 in 4 hours)
El Dorado Beach:	91 users	(274 in 3 hours)
Lake Forest Road:	62 users	(246 in 4 hours)
Elk's Point Road:	40 users	(161 in 4 hours)
Hidden Beach:	34 users	(101 in 3 hours)
National Avenue:	26 users	(104 in 4 hours)
Total	938 users	3624 users

Summarized, this data shows that Thursday, July 5, 2007, there were 938 users during the average midday hour passing through the nine points where data were collected.

Most trail users were either cyclists or pedestrians, with only a very small percentage using rollerblades or skateboards (Graphic 1).

Graphic 1: Respondents' indicated mode of travel

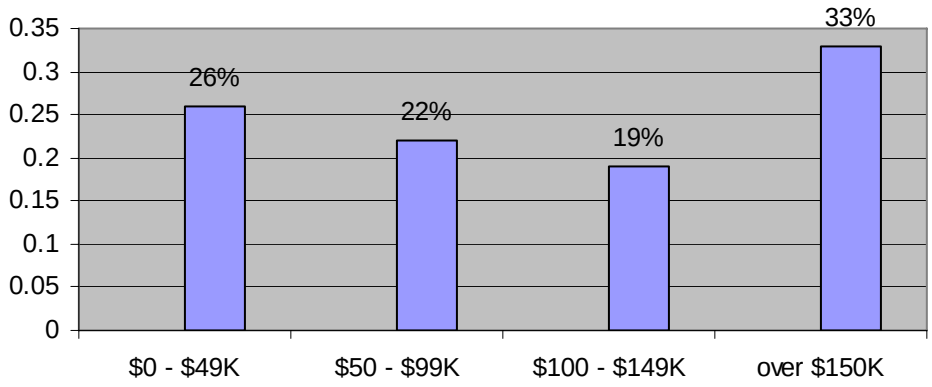


Forty percent (40%) of the respondents indicated that they were visitors to the Tahoe Area, 34% reported they were seasonal residents, and 26% said that they were permanent residents. The median number of days that visitors spent or were planning to spend in the Tahoe basin during the year 2007 was 12. The median number of trips to Tahoe for 2007 was 3. Most of the visitors were staying with a friend or relative in Tahoe (33%) followed by a time-share/condo (20%) and a rental (19%).

The main reasons why these visitors traveled to Tahoe were going to the beach, hiking, and cycling (please refer to Appendix A, Question #13-1, 13-2, and 13-3 for detailed information on visitors' first, second and third-choice purposes of their trip to Tahoe.)

Of the demographic data asked in the survey, most significant are the various income groups of the people that use Tahoe's trails (Graphic 2).

Graphic 2: What was your total household income (before taxes) in 2006?



Vehicle Miles Traveled (VMT)

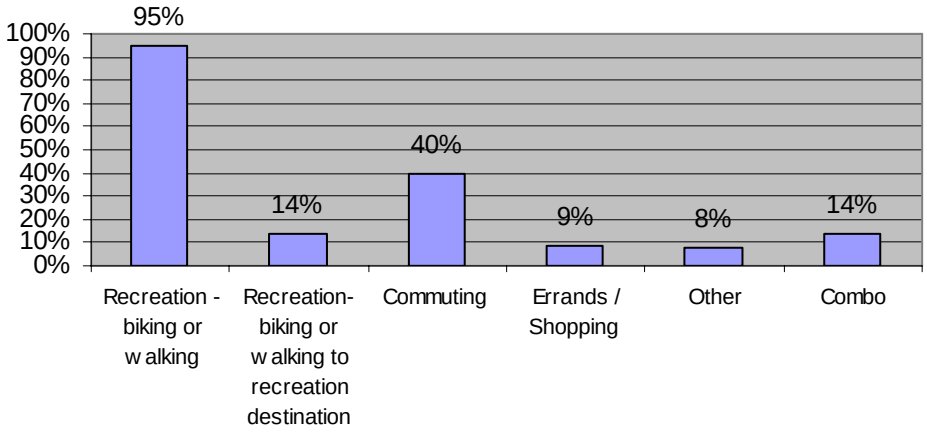
One of the questions of greatest interest to funders and planners is "how many cars are taken off the road by the construction of bicycle trails?" Generally, recreational bicycling or walking is not considered to replace a car trip, however in some instances perhaps it should. Many trail users may combine recreational and "errand" or work trips. Also, recreational trips on bicycle or by foot may replace motorized recreational trips (such as driving around the lake or jetskiing).

The three survey questions that tell the most about whether their trip replaced a car trip are Q-3, "Why are you making this trip today?", Q-4 "Did you start your trip from your

place of lodging/home or did you drive to the trail?", and Q-5 "How do you anticipate you would be making this trip if the trail did not exist?". Results to these questions can be seen in the graphs below.

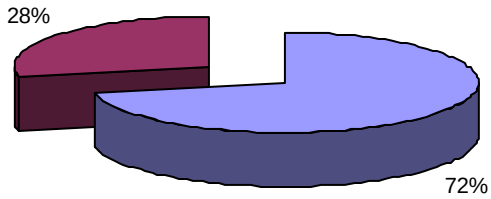
On the survey day, most respondents answered that they were using the trails that day for recreational biking or walking, which includes a high percentage of people biking only for recreation and a lower percentage of people that were using biking or walking to get to their recreation destination (Graphic 3)[3]. Since the survey time of day was mid-day, as opposed to during the commuting hours, and since commuters may be less likely to stop to take a survey, the survey results most likely to not accurately capture commuting trips.

Graphic 3: Why are you making this trip today?



Graphic 4 shows that 72% of the respondents started their trip at home or at their lodging. The other 28% drove to the trail. Most people planned on staying on the trail for three or more miles.

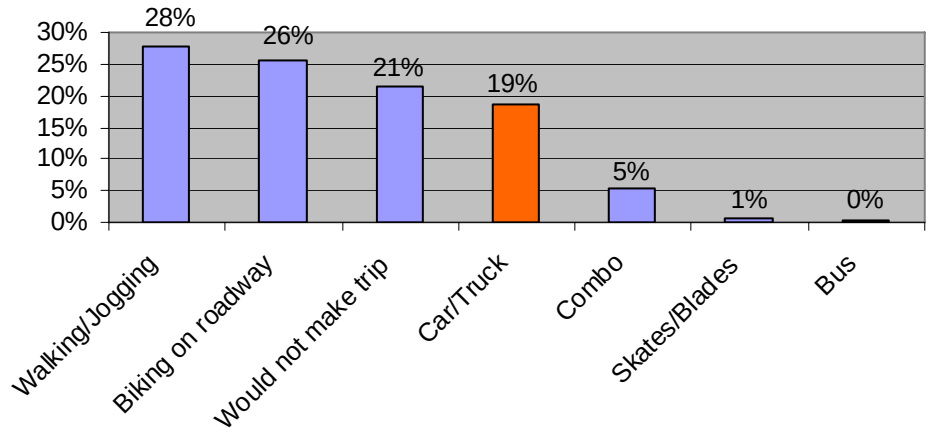
Graphic 4: Where did the trip start?



[3] The answer choices available for this question did not consider those that might be walking for exercise or walking to a recreation destination. Therefore, there were a high percentage of write-in answers for "other", which were subsequently re-categorized by transportation staff into the main categories. "Recreation-biking only" and "Recreation—biking to recreation destination" have been changed in the graph to include walking.

About one fifth of the surveyed visitors answered that they would not have made this trip if the bike trail did not exist. Another fifth would have driven their cars instead (orange columns in Graphic 5). Without this trail, 29% percent of the people would have switched to different recreational activities (walking/jogging or skates/blades).

Graphic 5: Mode of traveling if trail didn't exist



The percentages from these survey questions can also be *very roughly* extrapolated to vehicle miles travelled (VMT) to give some ballpark indication of the number of miles that these bicycling and walking trips are replacing automobile miles. Although graphic three shows that up to 40% of trips are "commuting" type of trips (errands, shopping, commuting, biking or walking to recreation destination, and "combo"), Graphic 5 shows the most conservative percentage of trips that would have been made by car if a trail did not exist--19%. The data also shows that the average trip length is 3.8 miles.[4] Using 938 as the average users per hour at all site locations combined, and rounding 19% up to 20%, we find that:

3.8 miles x 938 users x 20% replacing car trips = 720 miles in one hour.

Since the 938 users figure probably contains some duplicates (users were counted every time they passed by), to be conservative we could reduce that number by half. The hourly rate could be multiplied by four, to capture the four heaviest usage hours during the day.

3.8 miles x 470 users x 20% replacing car trips x 4 hours = 1440 miles/day

This is an extremely rough extrapolation, and also extremely conservative, since it does not represent all bicycle paths in the Basin, but it can give some idea of the miles of trips that are being replaced with non-auto modes due to bicycle trails. Individual trails can be

[4] This is a weighted average, using 360 survey responses, and assuming that no trip was greater than 6 miles.

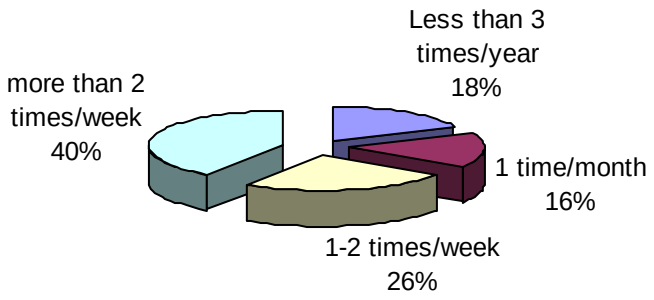
looked at on a case-by-case basis for an estimate per trail. Camp Richardson, with 224 users per hour, could be estimated to replace 344 vehicle miles per day using the above formula.

Additional Survey Results for Two Locations: National Avenue and Lake Forest Road

Two additional questions were added for the surveys at National Avenue and Lake Forest Road, based on a request by the consulting firm EDAW. At these two locations, 93% of the respondents indicated that they would bike or walk more often if there were a Class I (Shared Use) trail in this vicinity.

As Graphic 6 shows, most people would bike or walk at least once a week more often than they currently do, if a Class I (Shared Use) Trail were present.

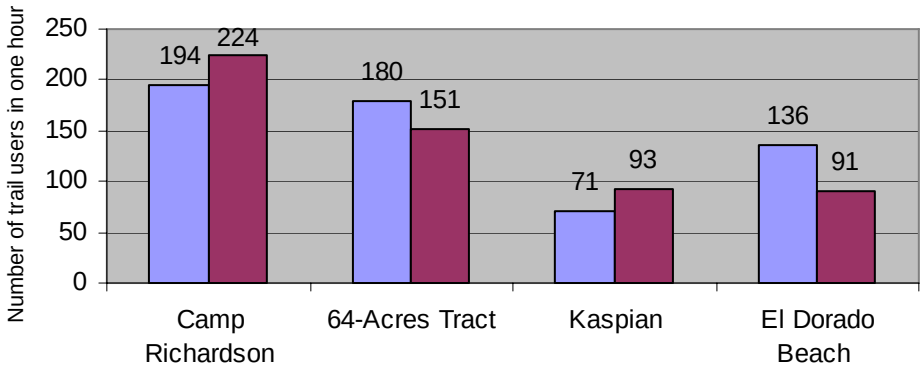
Graphic 6: Increased biking or walking if Class I Trail was present



Comparison of 1997 and 2007 Surveys

Users
The numbers of users per hour on the trail were slightly different in 2007 compared with 1997, although there is no statistical difference between these numbers. Graphic 7 shows a comparison of the two years for four trails. The other five trails could not be compared as only data for one of the years existed.

Graphic 7: Comparison of 1997 and 2007 Surveys



Survey Locations
For the 2007 survey, four locations were added as survey sites: Hidden Beach, Elks Point Road, National Avenue, and Lake Forest Road. These sites were all studied to gather site-specific user data for upcoming bicycle trail projects.

Survey Instrument
Survey questions #3 of the 1997 study and #7 of the 2007 study were posed the same ("Why are you making this trip today?"), but in 2007 the available answer choices broke out "recreation" into "recreation—biking only" and "recreation—biking to recreation destination". This was to differentiate between people who were riding more for the sake of riding, and for those who may have been replacing a vehicle trip with a bicycling trip.

The 1997 survey contained a few questions which were removed from the 2007 survey, these were:
Q8. How often have you used this trail?
Q10. Approximately how far is your home or where you are staying from the trail?
Q12. Please rate the quality of your recreational experience while using this trail which was removed in the 2007 survey.
Q13. What facility or amenity do you consider the nicest feature of this ride?

New questions in 2007 were:
Q6. How many people are in your travel party today?
Q8. Visitors/seasonal resident, please describe your stay here in Tahoe (total days/trips to Tahoe this year).
Q13. If visitor, what is the primary purpose of your visit in Lake Tahoe?
Q14-20. Demographic information.

Survey Results
Several questions showed marked similarities or differences between the two years.

User Type: In 1997, seventy-five percent of the trail users were cyclists, whereas in 2007, 51% of trail users were cyclists and 41% were pedestrians.

Distance traveling: The 1997 and 2007 surveys showed similarities overall in the distances users were traveling.

Starting from home or driving to the trail: In 1997, 39% of users reported driving to the trail, as compared to only 28% in 2007.

How would users be traveling if trail did not exist? In 1997, 31% reported they would use a car or a truck, 35% said they would bike on the roadway, and 18% said they would be walking or jogging. In 2007, 19% said they would use a car or a truck, 28% said they would be walking or jogging, and 26% said they would be biking on the roadway.

Type of lodging: For visitors, in 1997, 36% said they were staying in a rental house, 15% in a hotel/motel, and 17% at a friend or relative's. In 2007, 33% were staying with a friend or relative and only 19% in a rental, with 13% in a hotel/motel.

Since the surveys were conducted 10 years apart, there can be many explanations for any major differences between surveys. One reason for differences in answers to the questions noted above is that several new survey sites were added in 2007, and the new sites could be weighted more heavily towards a certain type of user or type of lodging. It should also be noted that the 2007 surveys were conducted less than two weeks after the Angora Fire. Visitation to the South Shore, and perhaps to the Basin as a whole, was affected by the fire and many visitors chose to cancel plans to visit Tahoe near that time.

Cyclists on a coffee break

Limitations of the Survey

The major limitation of the survey was that it was conducted on only one day, and that day was near a major holiday. This date was chosen for consistency with the 1997 survey, and to ensure a high response rate to the survey. However, the results of the survey may show higher visitor use than would ordinarily be the case due to the proximity of the date to the Fourth of July holiday.

While the training instructed volunteers to survey only one person from each party, it appears from some of the responses that several individuals from one party did answer the survey in some cases.

Recommendations for Future Surveys

Future surveys should be conducted more frequently than at a 10-year interval. Ideally surveys would be conducted at 2-year intervals. Also, while for comparable results it is important for these surveys to choose dates that are similar to the dates chosen in 1997 and 2007, there is some interest among bicycle and pedestrian planners and advocates to conduct surveys at other times. If resources allow, a separate survey could be conducted to capture users during peak commuting hours, during weekends, or during a weekday that is not near a major holiday. While this data should not be used in place of the current survey framework, it would provide useful data to bicycle trail planners.

For the future, the number of needed surveyors could be determined by taking the 1997 and 2007 study results into account. More volunteers could be placed on those trails where a lot of traffic is expected than on those with little traffic.

A few of the questions should be slightly altered in a future survey:

Question 3:	The answers to this question should be modified slightly, as they currently overlap. Add “Exercise/Strolling/Recreational Riding”, add “commuting to work”, change “Recreation—biking to recreation destination” to “biking or walking to recreation destination”, take out “Recreation—biking only”, take out “commuting”, change “Errands” to “Errands/Shopping”, and take out “Shopping”.
Question 6:	The question “How many people are in your travel party at Lake Tahoe today?” should be changed to “How many people are in your travel party on this trail today?”
Question 9:	Change answer “North Shore” to “Other North Shore” and list immediately under “Tahoe City”.
Question 11:	The answers to this question should be put in order.

Possible new questions:	Did you rent your bicycle in the Lake Tahoe area or bring it from home? Ask a question that provides an indication of the trail user's economic impact at Lake Tahoe (suggested by the Lake Tahoe Bicycle Coalition).

Observations and suggestions that surveyors made in 2007:

- An Elk's Point Road Surveyor wrote: "I might pick a different corner of the intersection for survey work if I were to replicate this study. I also might rather pick the location at Elks Point Road and Dorla Court (if I was trying to capture trail users headed for NV Beach)."

- Locate the survey station so that you have 30 yards of visibility to oncoming traffic. That way the bicycle will have time to see you and come to a stop.

- Offer trail users bottled water: "Nothing stops the traffic like a cold bottle of water".

- It might be useful to have a large print version of the survey on hand—a couple of people had trouble reading it.

- "Signs for the tables would be nice. I didn't have much luck with mounting my sign [posts], but if each table had a sign it would resolve this issue."

- "We could use this as an opportunity to disseminate trail information/brochures. I had several people ask for that type of information."

- "While driving up this morning I noticed a ton of walkers on the trail, but did not get that many after we set up. I think next time we need to set up earlier to capture the morning walkers."

- "One thing that stood out in my mind is that I felt like we missed most of the Hwy. 50 bike traffic during the 10-2 pm window. I would think ideally we could survey a.m. and p.m. peak hours and noon time hours. That's probably a lot of volunteer time, but maybe we could do a morning and noon time period. Also, in a perfect world would be nice to get data on peak holiday, weekday, and weekend."

Biker on Hwy. 50

Acknowledgements

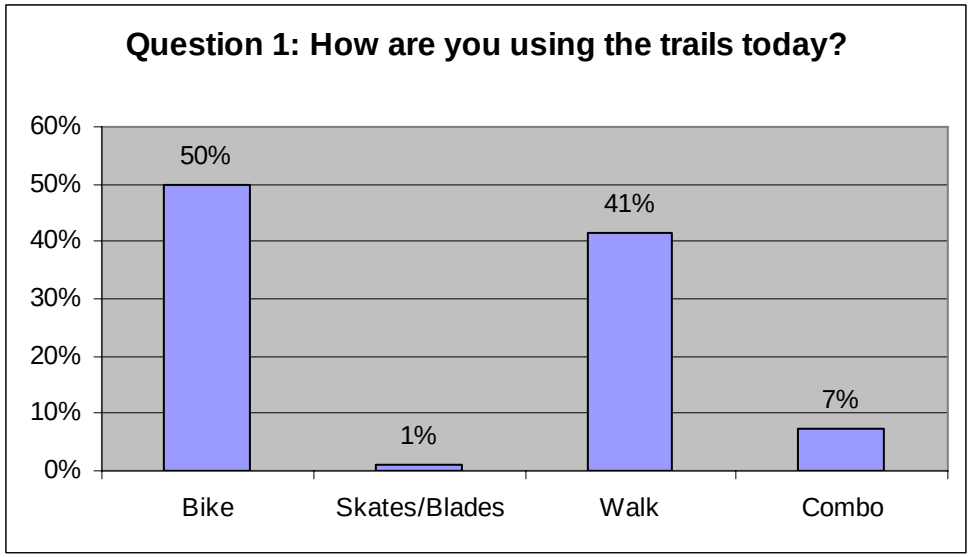
TCORP and the TRPA are grateful for the cooperation and interest of all participating organizations and local cyclists who took part in this study. It would not have been possible without their help. This survey was supported by:

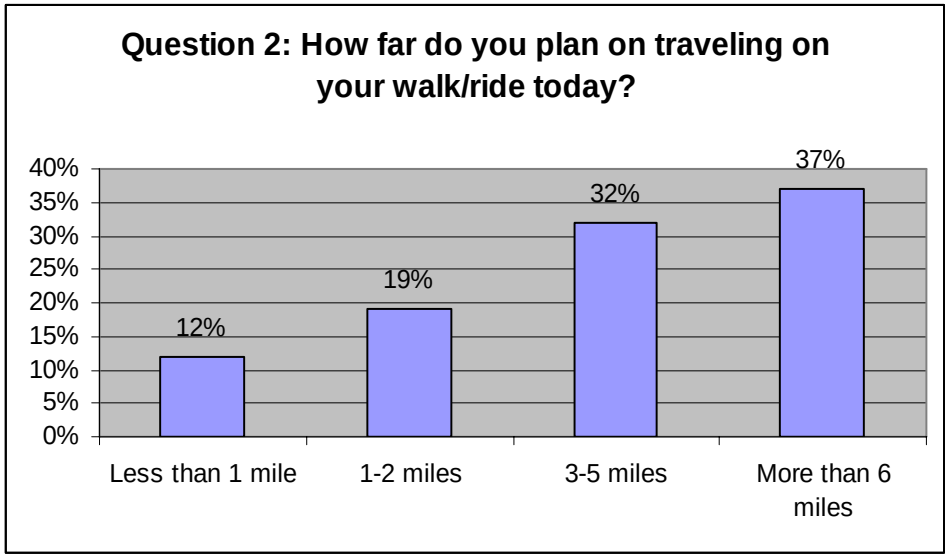
64-Acre Tract:	John Reichert (Tahoe City Public Utility District) and other TCPUD volunteers
Kaspian:	Peter Eichar (California Tahoe Conservancy) Kellee Jones (TRPA)
Camp Richardson:	Karen Fink (TRPA) Ana Arneodo (local volunteer)
Incline Beach:	Sheila Leijon (Incline Village General Improvement District) Melissa Johnson (Incline Village General Improvement District) and other IVGID volunteers
El Dorado Beach:	Stan Hill (City of South Lake Tahoe) Bonnie Turnbul (local cyclist) Jessie Brown (local cyclist) Peter Fink (local cyclist)
Hidden Beach:	Kristine Bunnell (Washoe County) Karen Mullen (Karen Mullen-Ehly, Inc.) Cheryl Surface (Nevada State Parks)
Elk's Point Road:	Nanette Hansel (EDAW) Amber Letizia and Paige Allison (Nevada Department of Transportation)
National Avenue / Lake Forest Road:	Kim Carr (EDAW) Patricia Hickson (EDAW) John Friedrich (local cyclist)

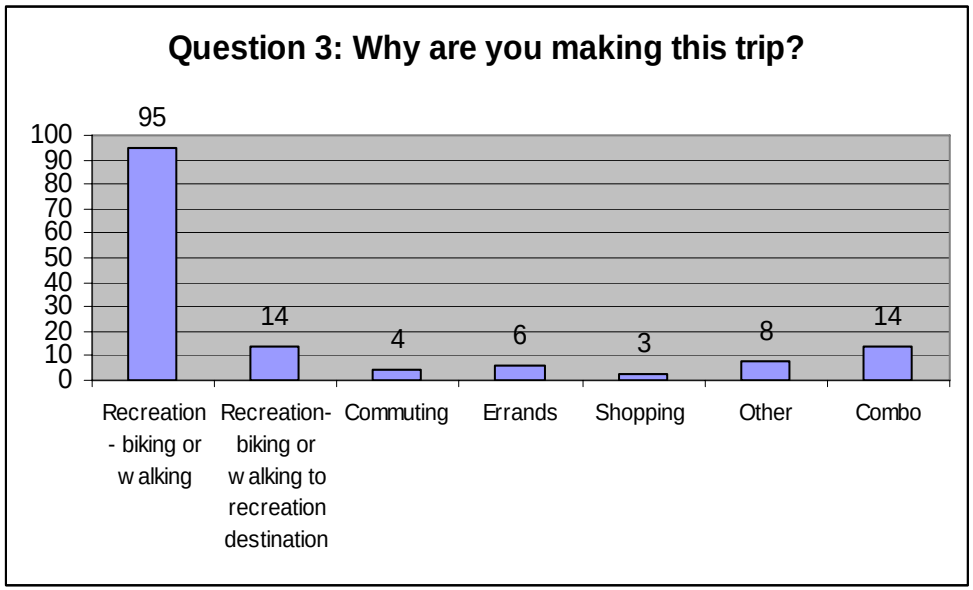
Appendices

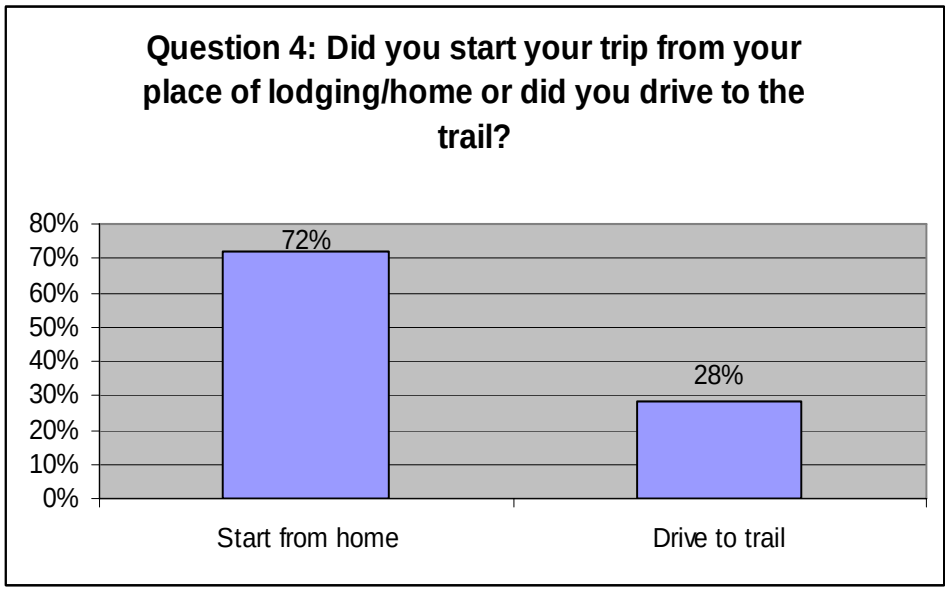
Appendix A -- Graphic results for each survey question (full survey set)
Appendix B -- Graphic results for questions #2 and #4 for each survey site
Appendix C -- Trail user comments
Appendix D -- Surveyor training materials
Appendix E -- 2007 Survey Instrument
Appendix F -- Counting sheet

For further information about this study, please contact
Karen Fink at TRPA 775-588-4547, ext. 204 or kfink@trpa.org.

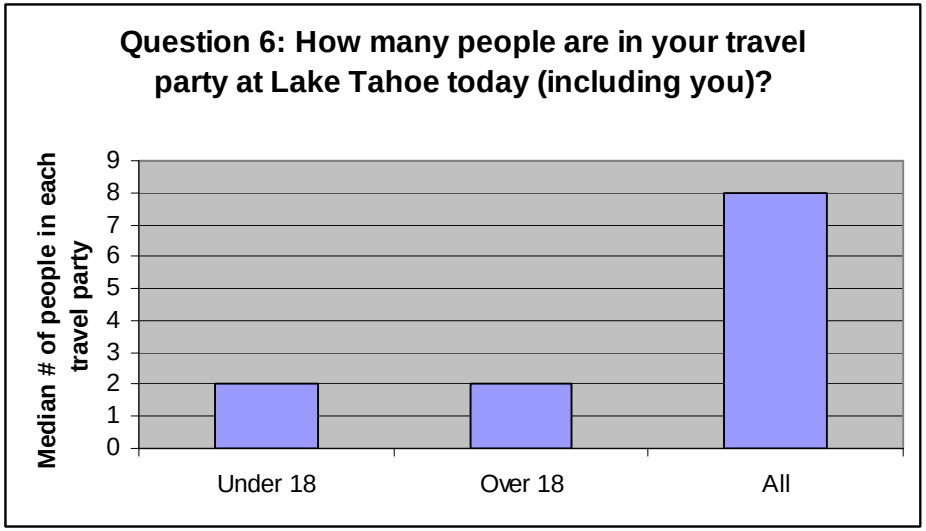

Question 1: How are you using the trails today?
60%
50%
40%
30%
20%
10%
0%
50%
1%
41%
7%
Bike
Skates/Blades
Walk
Combo

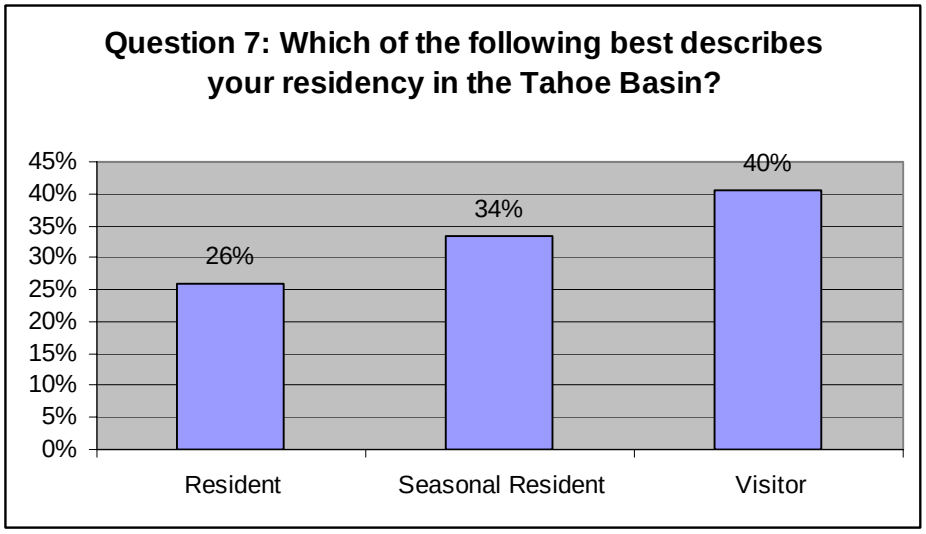

Question 2: How far do you plan on traveling on your walk/ride today?
40%
35%
30%
25%
20%
15%
10%
5%
0%
12%
19%
32%
37%
Less than 1 mile
1-2 miles
3-5 miles
More than 6 miles

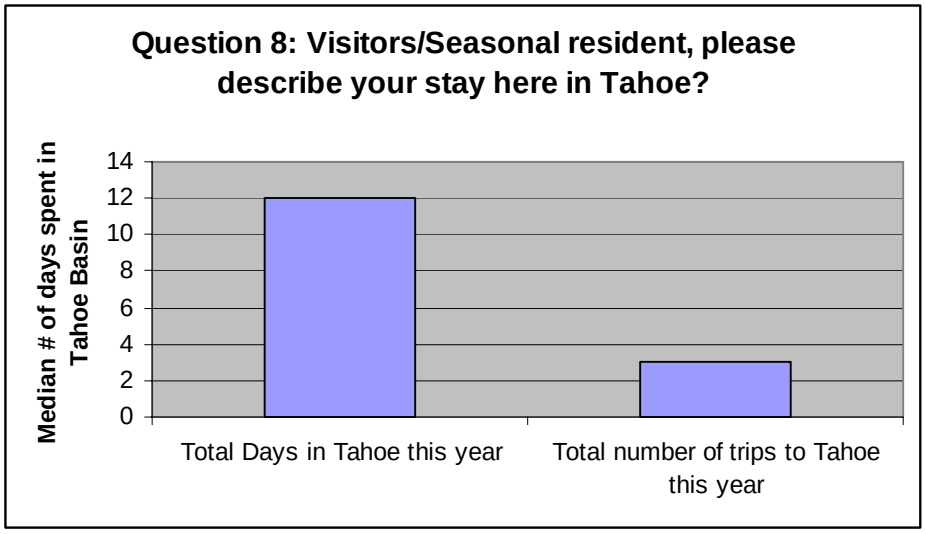

Question 3: Why are you making this trip?
100
90
80
70
60
50
40
30
20
10
0
95
14
4
6
3
8
14
Recreation - biking or walking
Recreation- biking or walking to recreation destination
Commuting
Errands
Shopping
Other
Combo

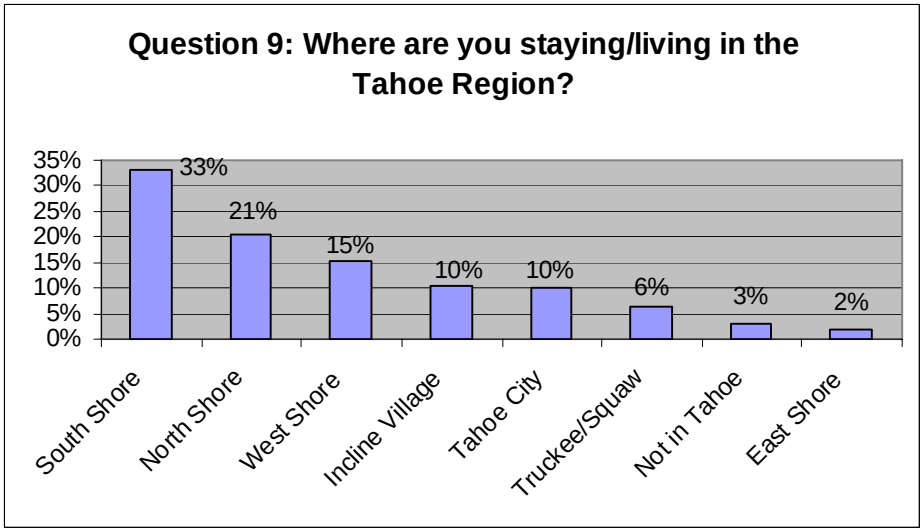

Question 4: Did you start your trip from your place of lodging/home or did you drive to the trail?
80%
70%
60%
50%
40%
30%
20%
10%
0%
72%
28%
Start from home
Drive to trail

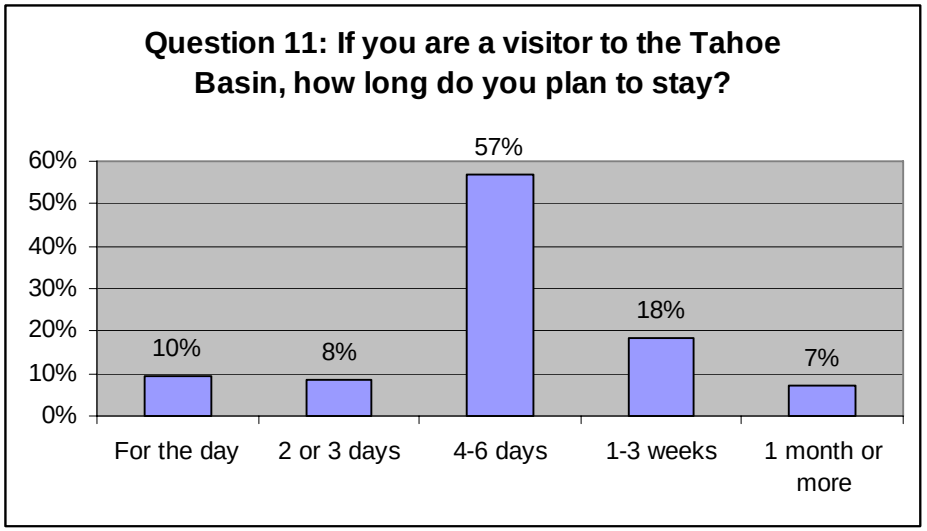

Question 5: How do you anticipate you would be traveling if this trail did not exist?
30%
25%
20%
15%
10%
5%
0%
28%
26%
21%
19%
5%
1%
0%
Walking/Jogging
Biking on roadway
Would not make trip
Car/Truck
Combo
Skates/Blades
Bus

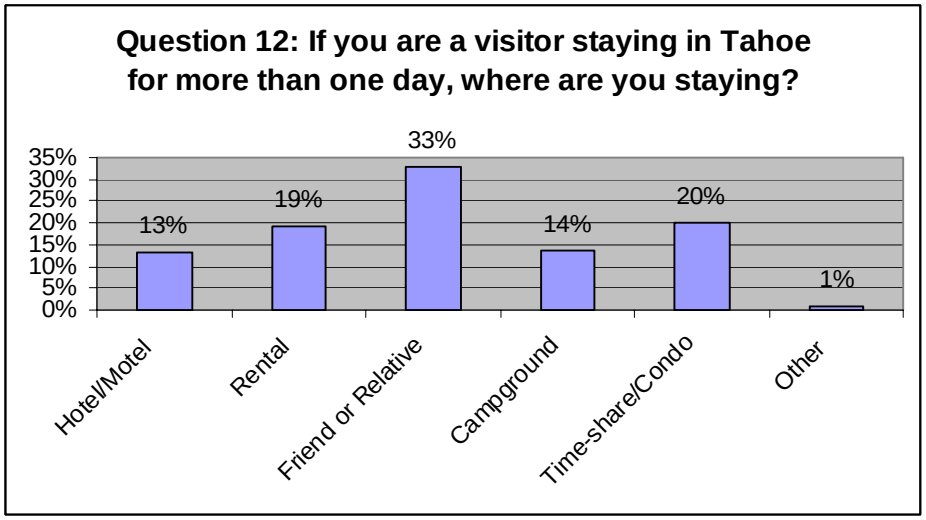

Question 6: How many people are in your travel party at Lake Tahoe today (including you)?
Median # of people in each travel party
9
8
7
6
5
4
3
2
1
0
Under 18
Over 18
All

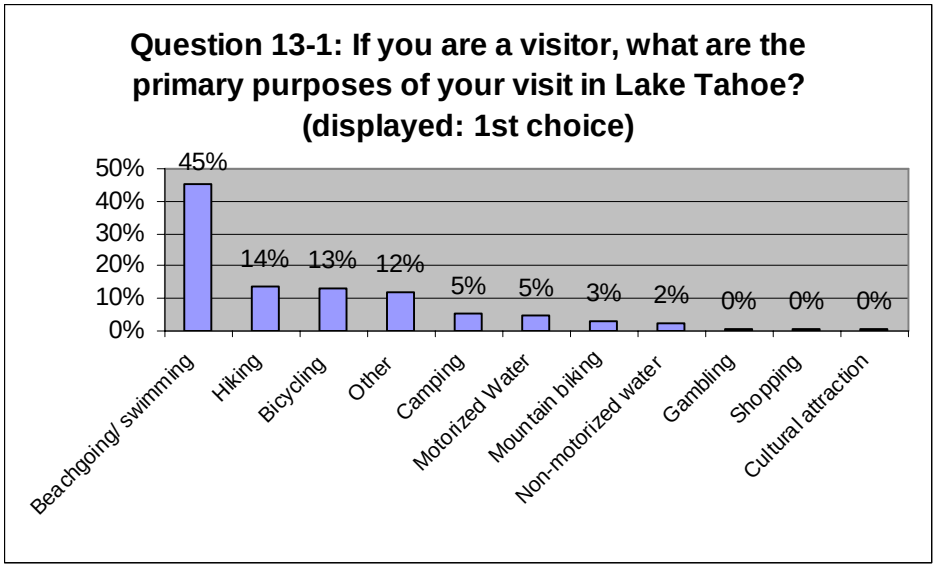

Question 7: Which of the following best describes your residency in the Tahoe Basin?
45%
40%
35%
30%
25%
20%
15%
10%
5%
0%
26%
34%
40%
Resident
Seasonal Resident
Visitor

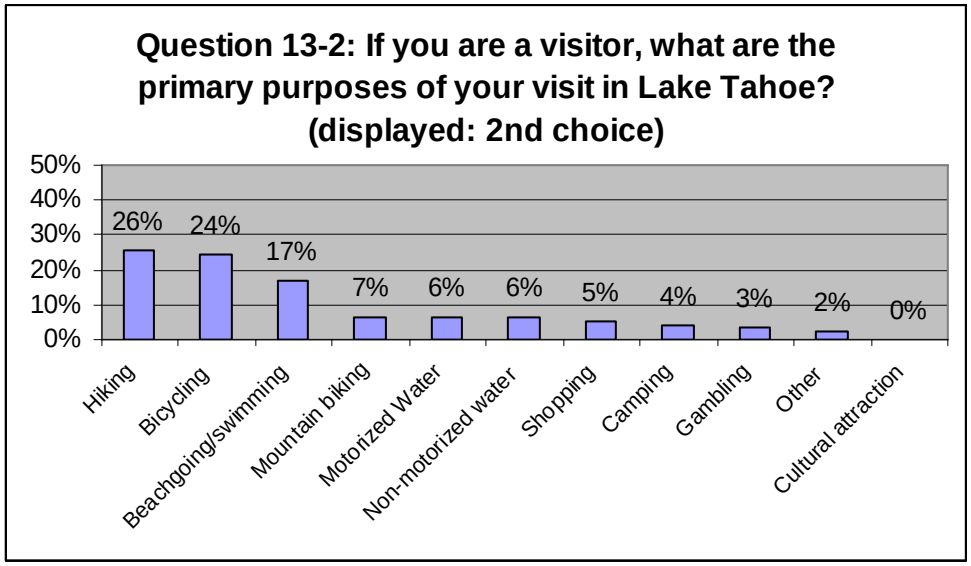

Question 8: Visitors/Seasonal resident, please describe your stay here in Tahoe?
Median # of days spent in Tahoe Basin
14
12
10
8
6
4
2
0
Total Days in Tahoe this year
Total number of trips to Tahoe this year

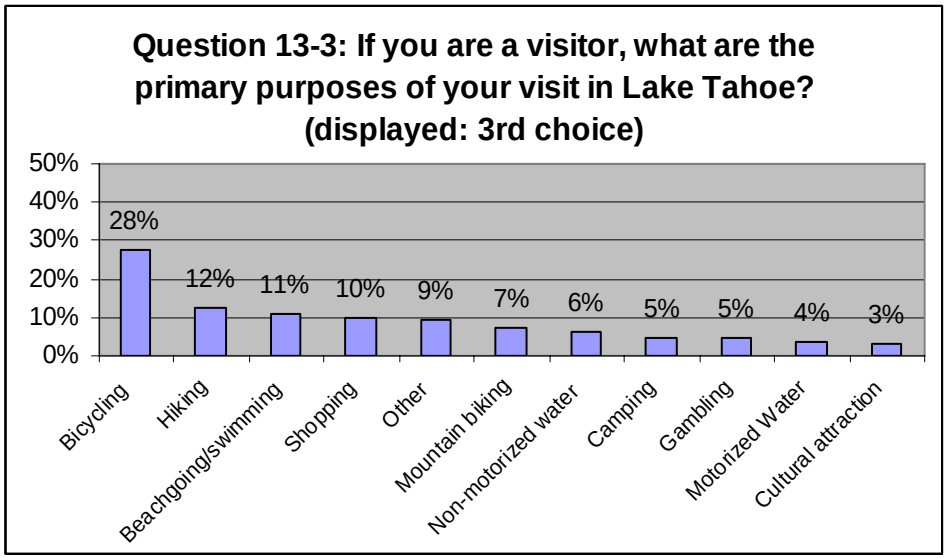

Question 9: Where are you staying/living in the Tahoe Region?
35%
30%
25%
20%
15%
10%
5%
0%
33%
21%
15%
10%
10%
6%
3%
2%
South Shore
North Shore
West Shore
Incline Village
Tahoe City
Truckee/Squaw
Not in Tahoe
East Shore

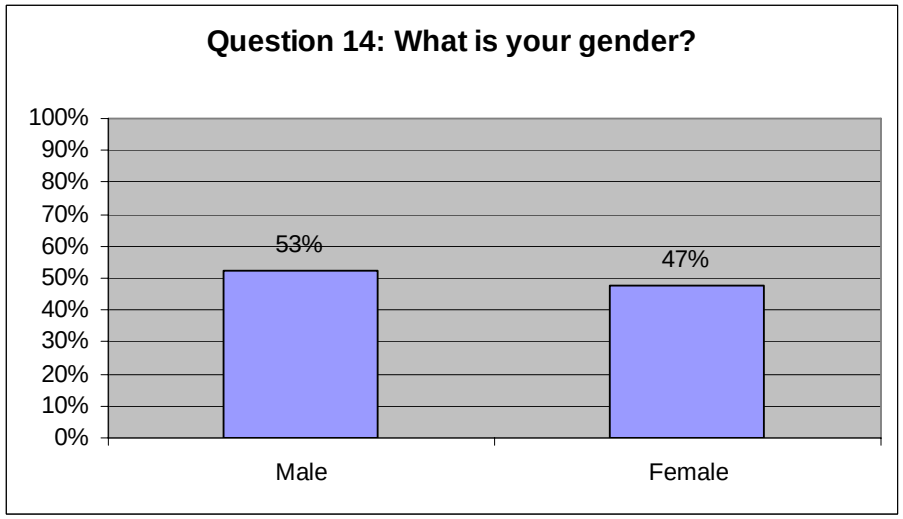

Question 11: If you are a visitor to the Tahoe Basin, how long do you plan to stay?
60%
50%
40%
30%
20%
10%
0%
10%
8%
57%
18%
7%
For the day
2 or 3 days
4-6 days
1-3 weeks
1 month or more

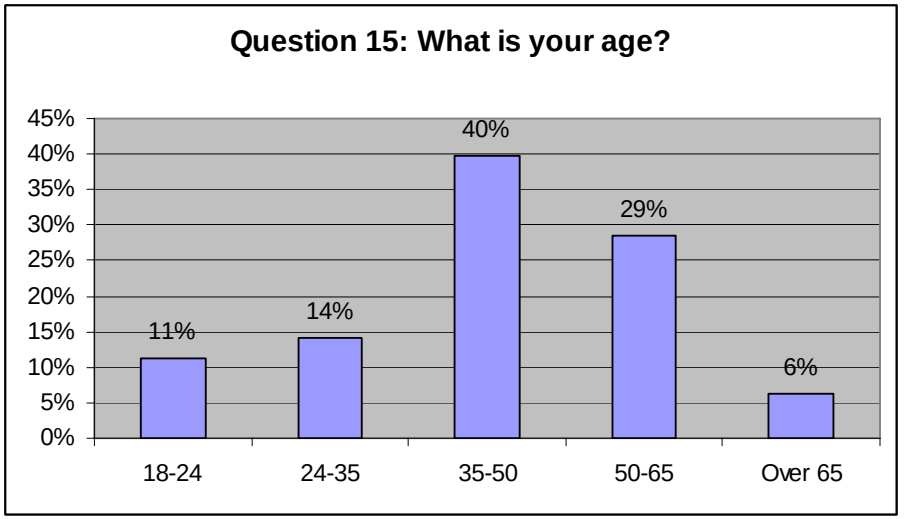

Question 12: If you are a visitor staying in Tahoe for more than one day, where are you staying?
35%
30%
25%
20%
15%
10%
5%
0%
13%
19%
33%
14%
20%
1%
Hotel/Motel
Rental
Friend or Relative
Campground
Time-share/Condo
Other

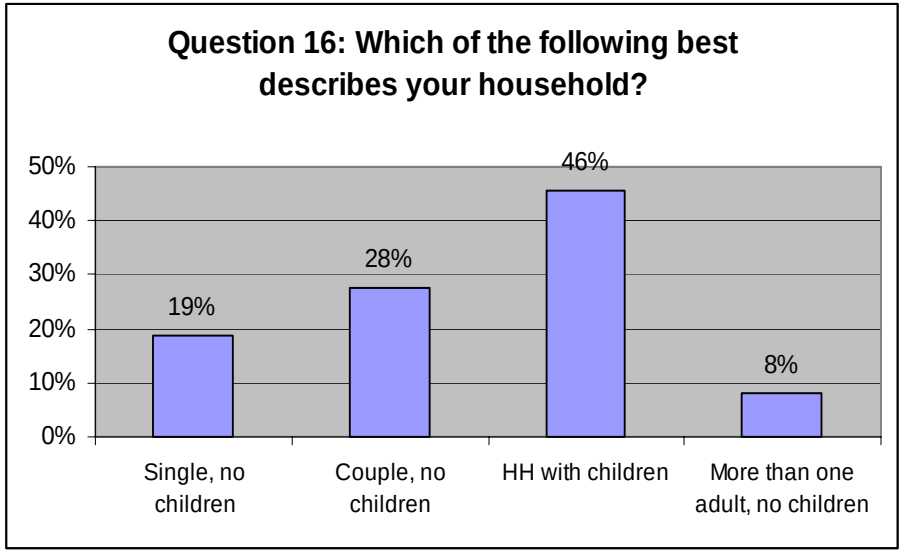

Question 13-1: If you are a visitor, what are the primary purposes of your visit in Lake Tahoe? (displayed: 1st choice)
50%
40%
30%
20%
10%
0%
45%
14%
13%
12%
5%
5%
3%
2%
0%
0%
0%
Beachgoing/ swimming
Hiking
Bicycling
Other
Camping
Motorized Water
Mountain biking
Non-motorized water
Gambling
Shopping
Cultural attraction

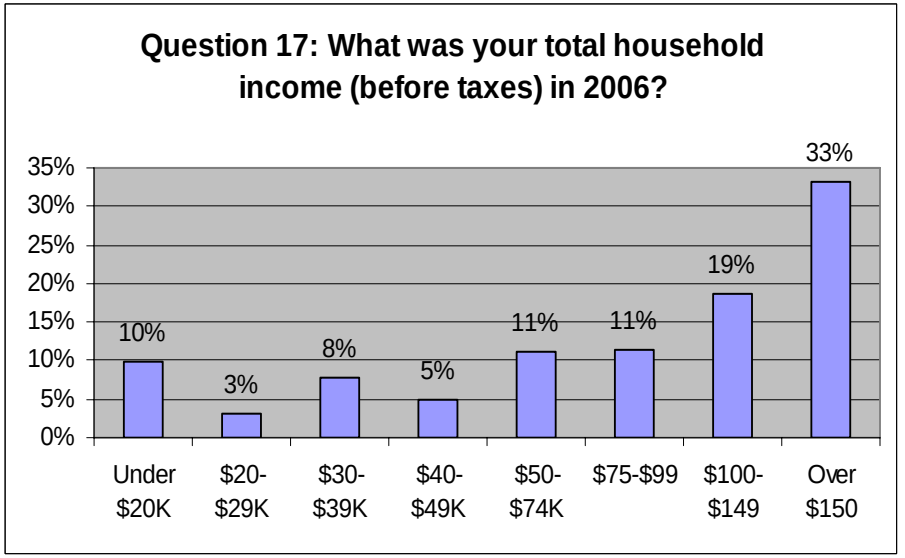

Question 13-2: If you are a visitor, what are the primary purposes of your visit in Lake Tahoe? (displayed: 2nd choice)
50%
40%
30%
20%
10%
0%
26%
24%
17%
7%
6%
6%
5%
4%
3%
2%
0%
Hiking
Bicycling
Beachgoing/swimming
Mountain biking
Motorized Water
Non-motorized water
Shopping
Camping
Gambling
Other
Cultural attraction

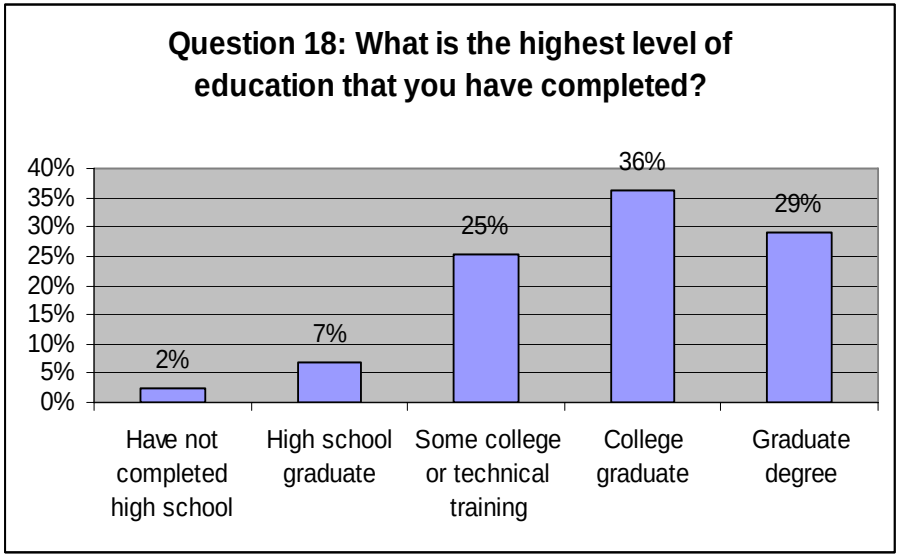

Question 13-3: If you are a visitor, what are the primary purposes of your visit in Lake Tahoe? (displayed: 3rd choice)
50%
40%
30%
20%
10%
0%
28%
12%
11%
10%
9%
7%
6%
5%
5%
4%
3%
Bicycling
Hiking
Beachgoing/swimming
Shopping
Other
Mountain biking
Non-motorized water
Camping
Gambling
Motorized Water
Cultural attraction

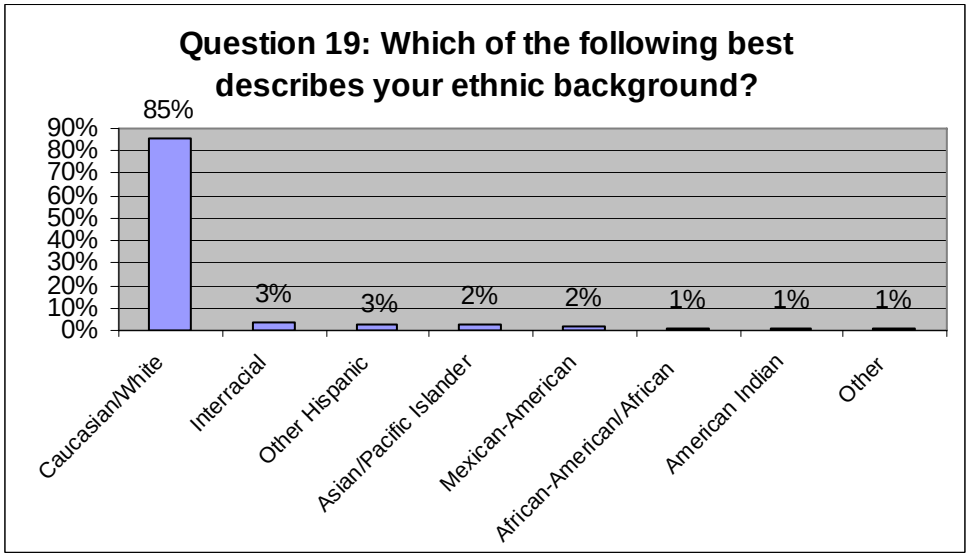

Question 14: What is your gender?
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
53%
47%
Male
Female


Question 15: What is your age?
45%
40%
35%
30%
25%
20%
15%
10%
5%
0%
11%
14%
40%
29%
6%
18-24
24-35
35-50
50-65
Over 65


Question 16: Which of the following best describes your household?
50%
40%
30%
20%
10%
0%
19%
28%
46%
8%
Single, no children
Couple, no children
HH with children
More than one adult, no children


Question 17: What was your total household income (before taxes) in 2006?
35%
30%
25%
20%
15%
10%
5%
0%
10%
3%
8%
5%
11%
11%
19%
33%
Under $20K
$20-$29K
$30-$39K
$40-$49K
$50-$74K
$75-$99
$100-$149
Over $150



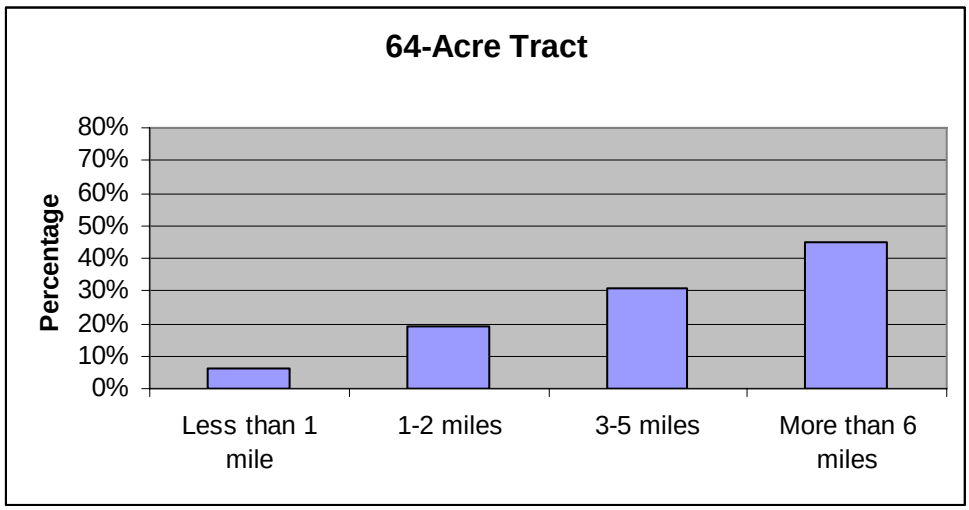


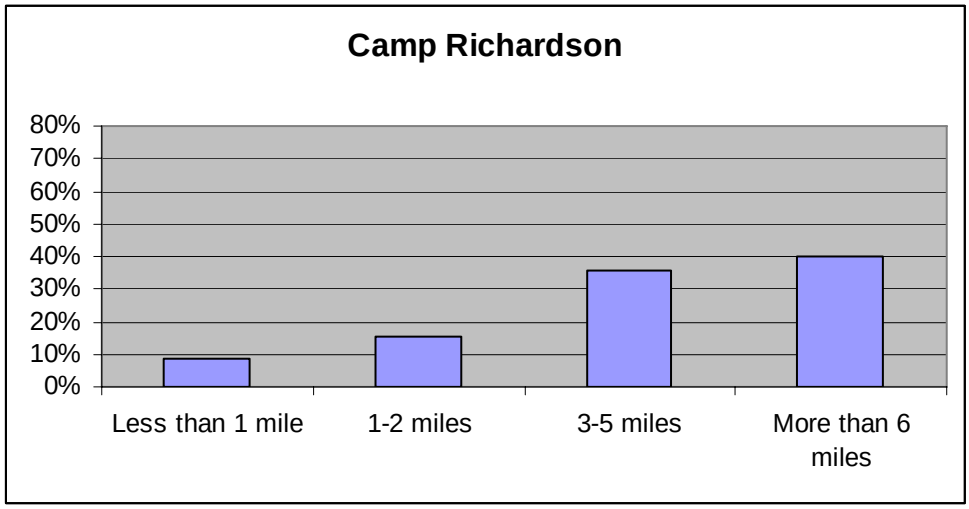
Question 20: If you are not a permanent U.S. resident, what is your country of origin?

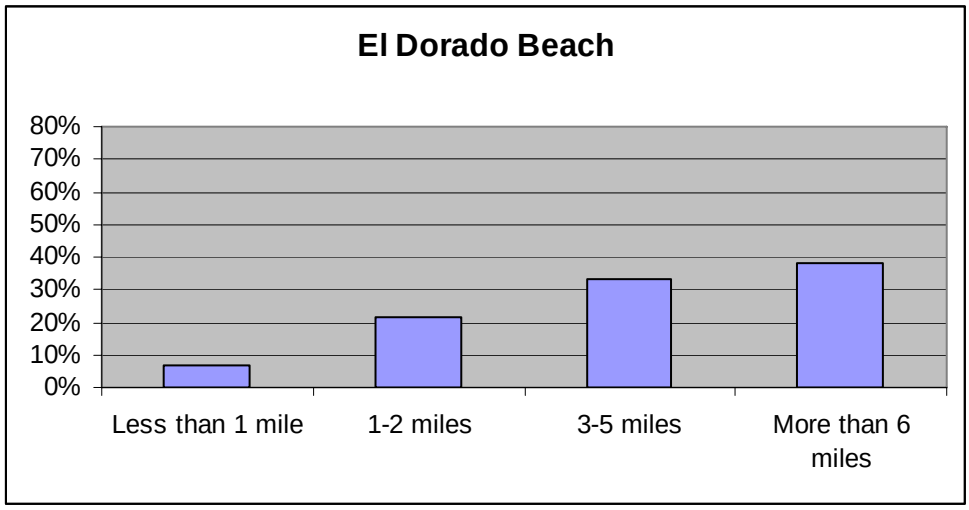
Each of the following countries was named once; all the other respondents were U.S. residents.

Columbia
England
Mexico
Brazil
New Zealand
Germany
Canada

Question #2: How far do you plan on traveling on your walk/ride today?

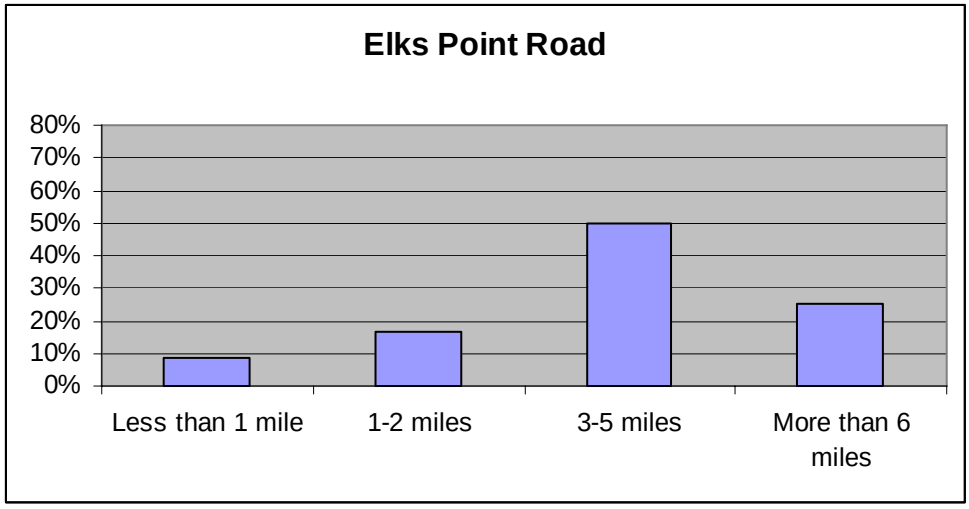


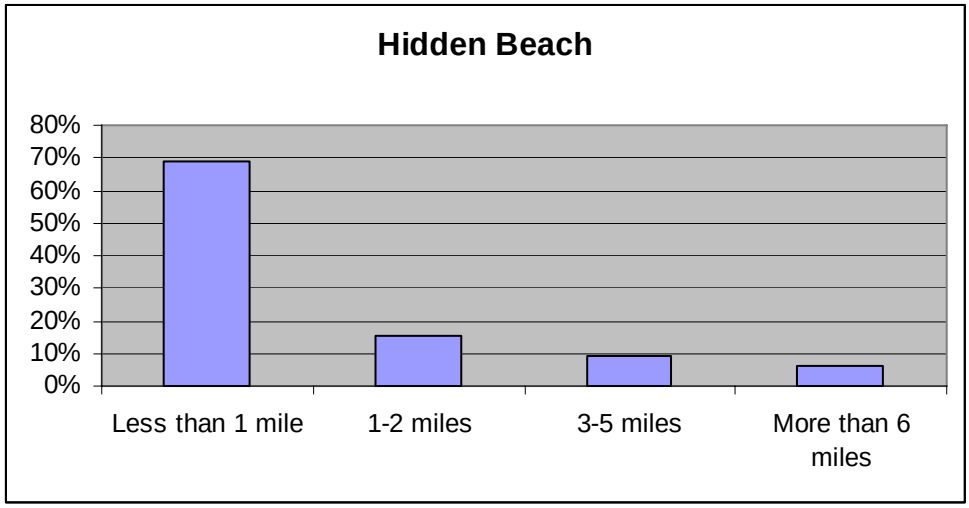


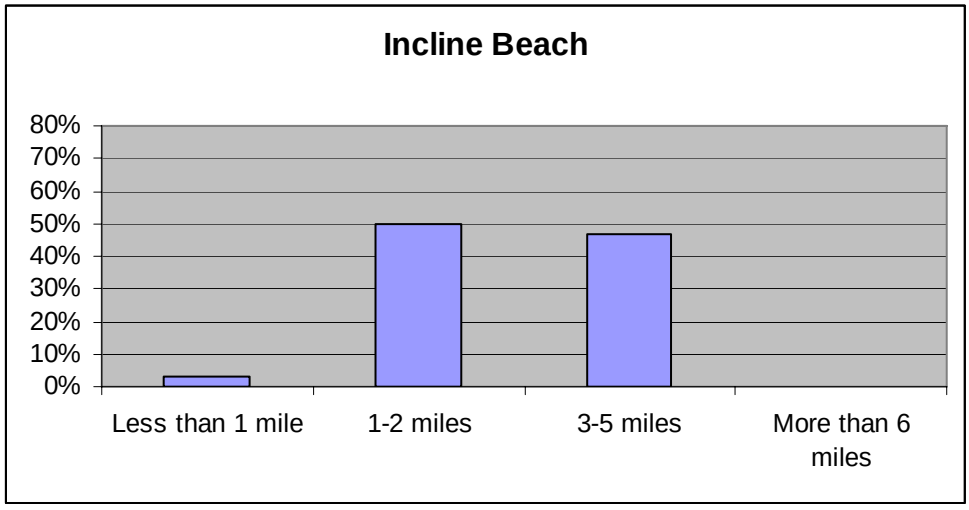


APPENDIX B

Graphic Results for Questions #2 and #4 for Selected Sites

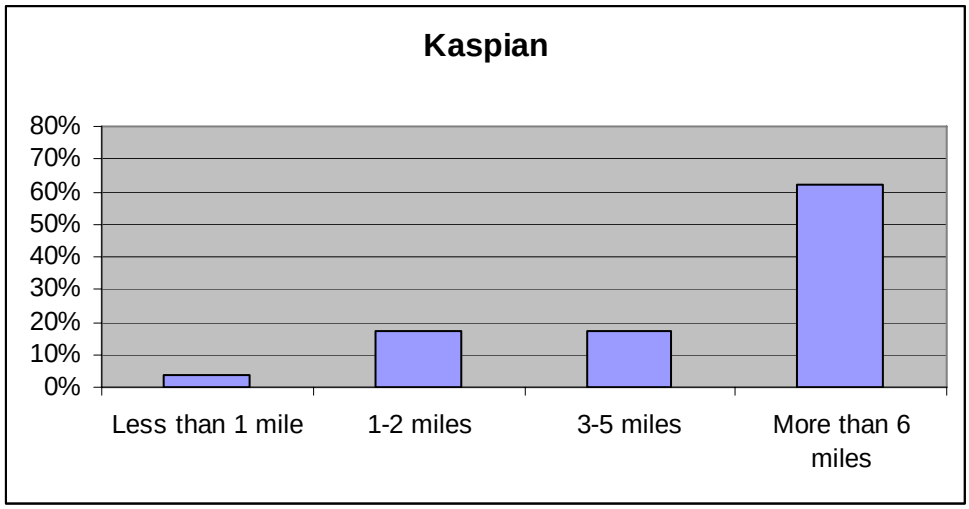


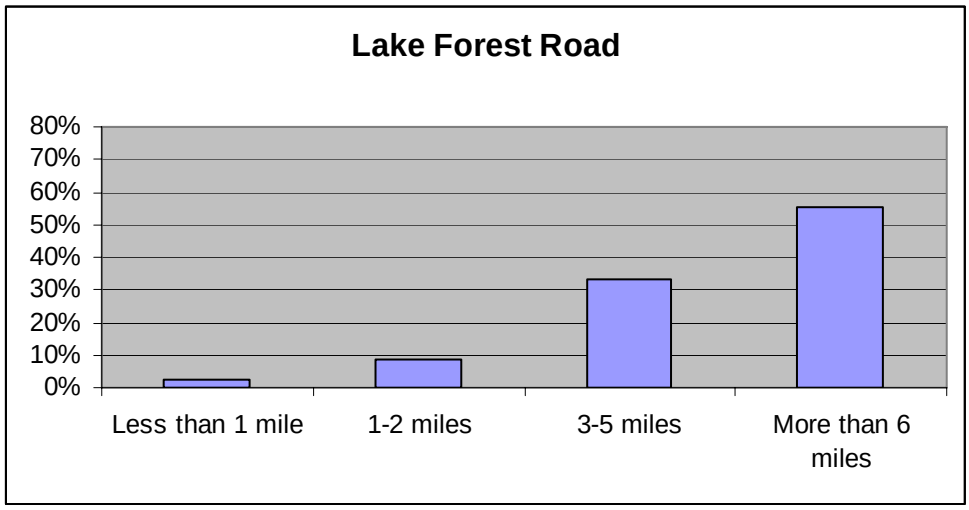


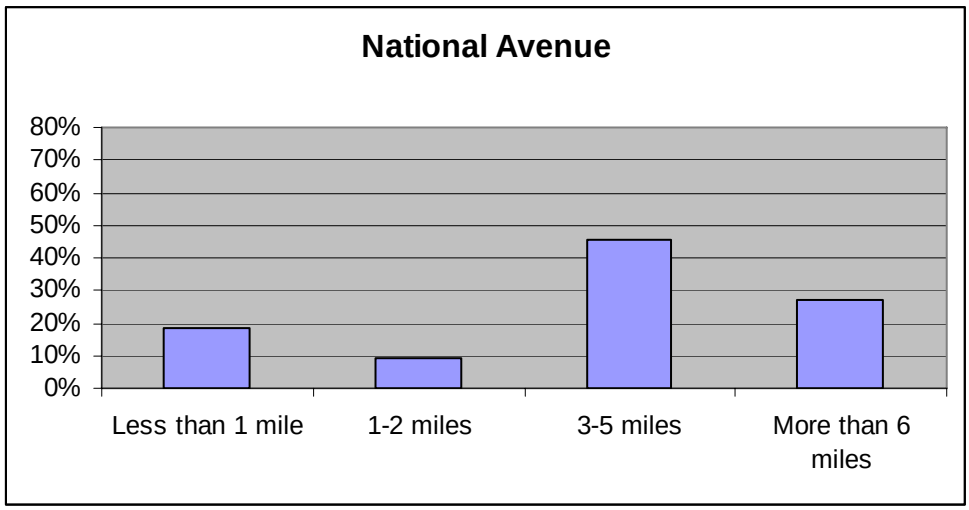


APPENDIX B

Graphic Results for Questions #2 and #4 for Selected Sites



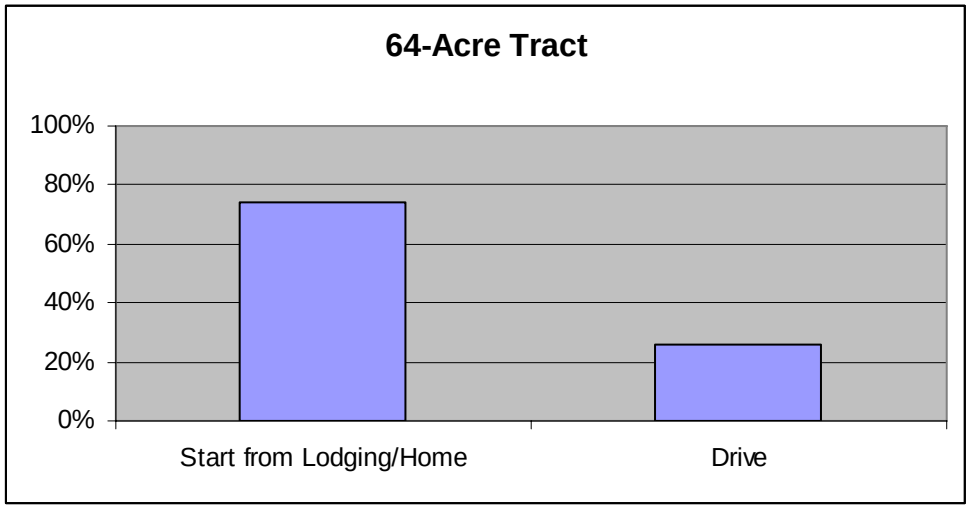


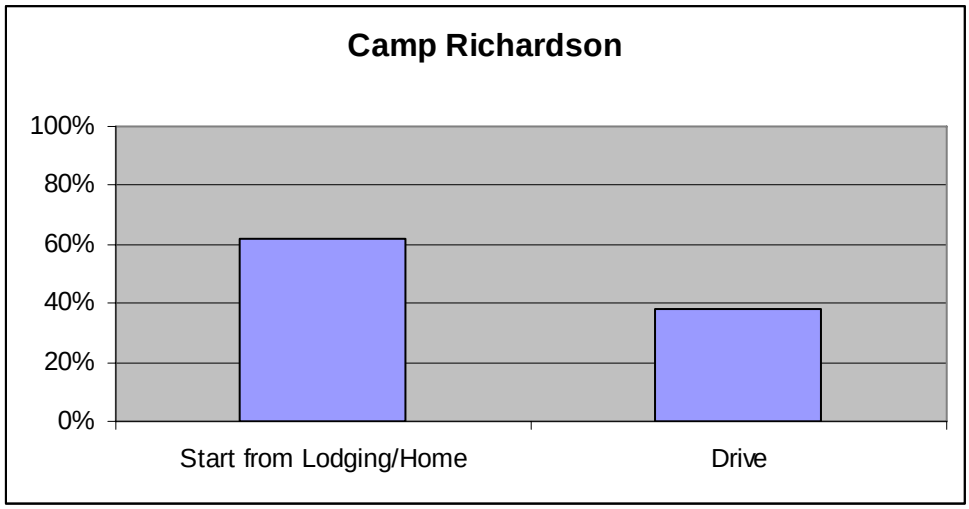


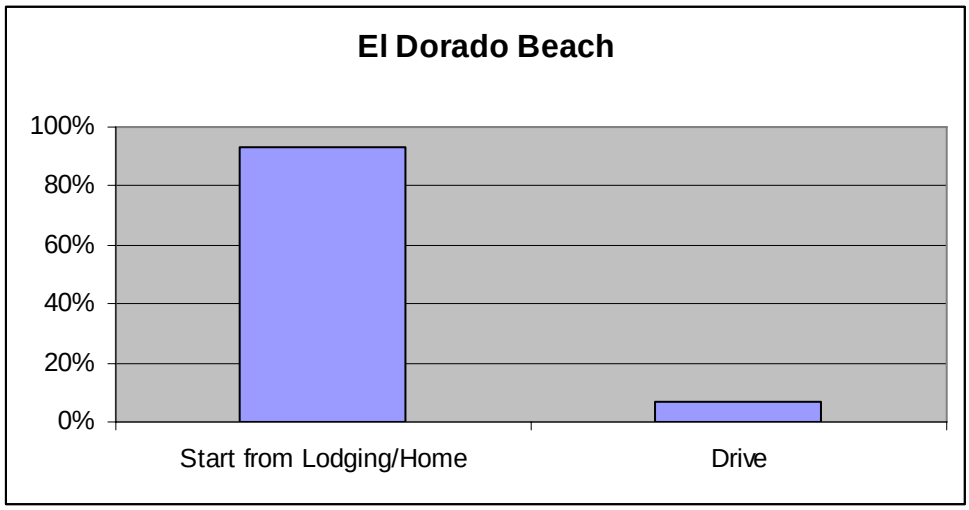
APPENDIX B

Graphic Results for Questions #2 and #4 for Selected Sites

Question 4: Did you start your trip from home or did you drive to the trail?

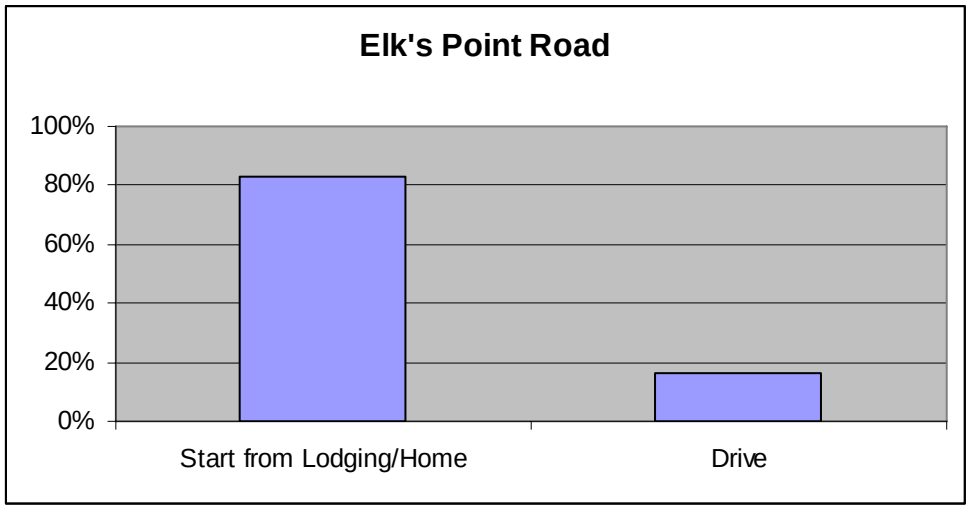


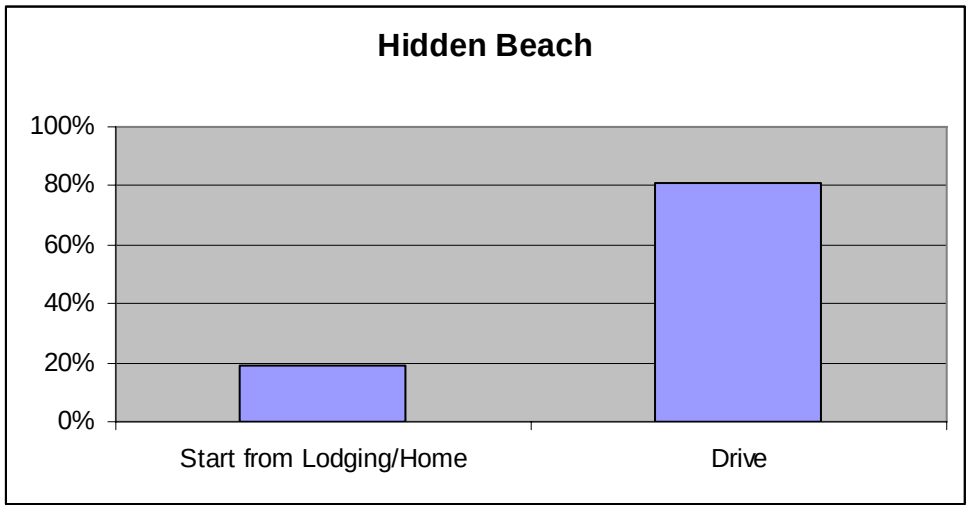


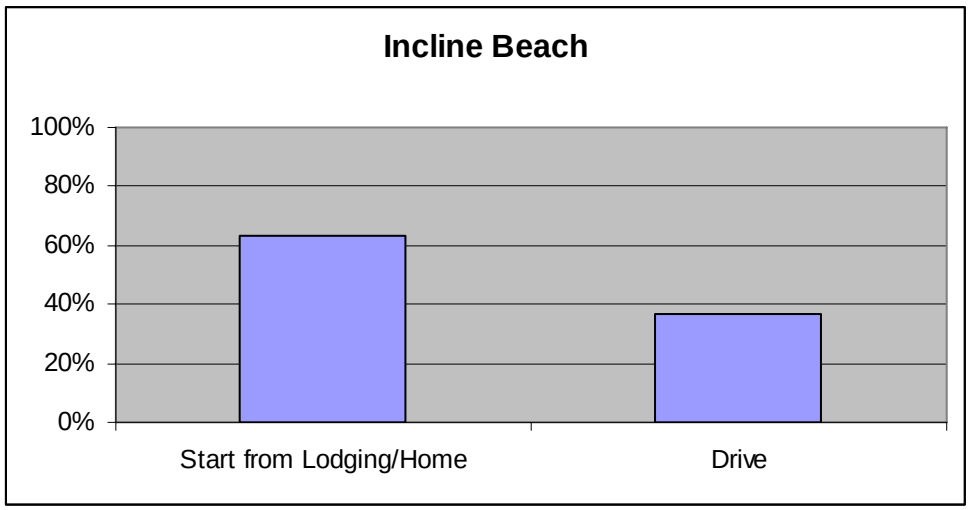


APPENDIX B

Graphic Results for Questions #2 and #4 for Selected Sites







APPENDIX B

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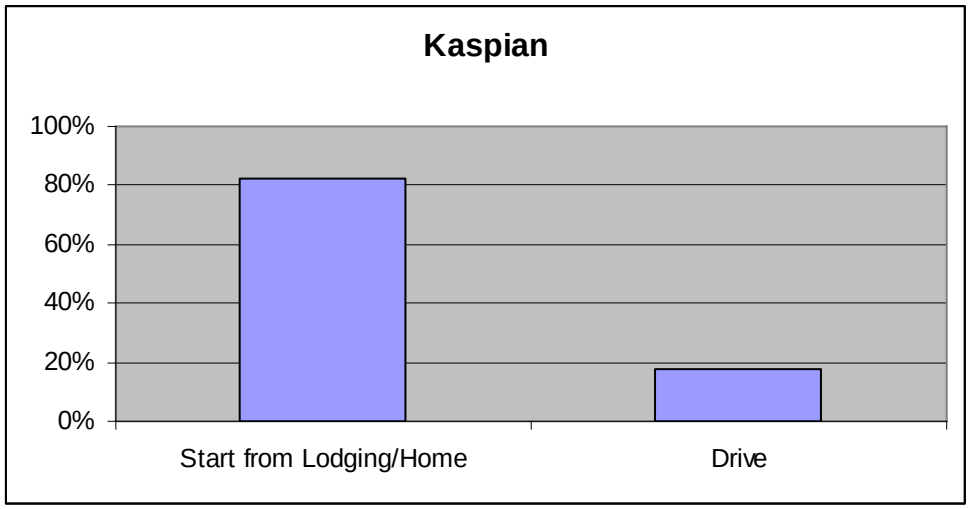
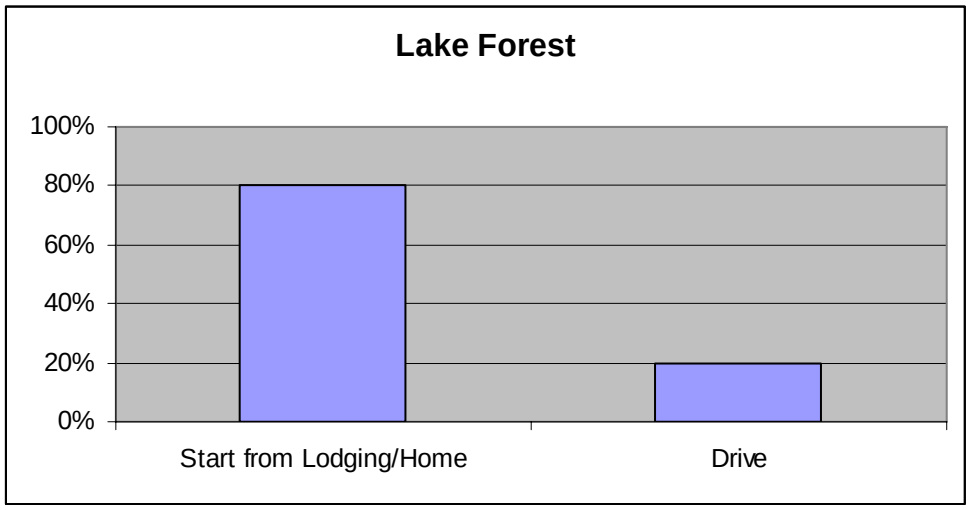
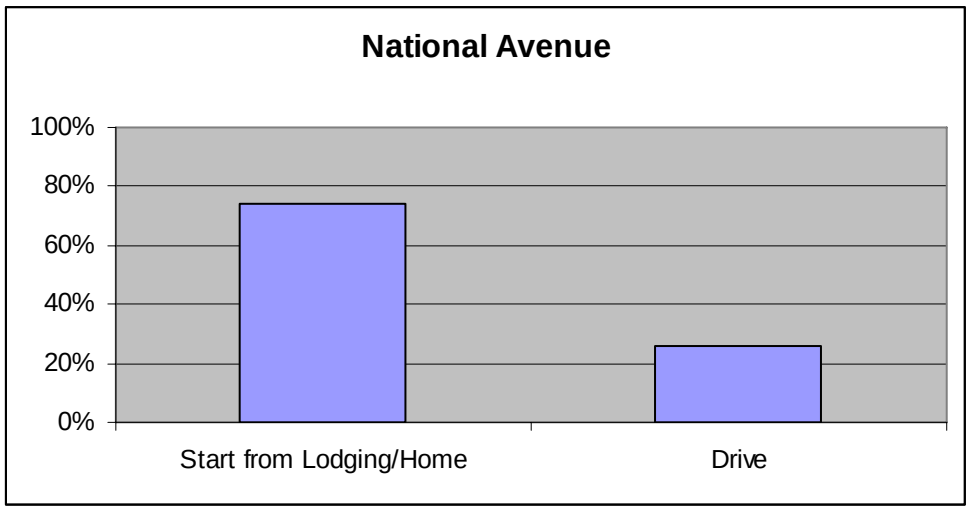






The data for these questions are not statistically significant at the site level.

Comments from Question 21 broken up by survey sites
"Do you have any comments, suggestions, or concerns?"

Survey site: Kaspian

- 1. Longer season maintenance April/May--first snow. Pineland Drive to Lake Forest for locals in Tahoe City. 2. Continue BT from Cherry to Ski Bowl Way (Homewood). 3. All bicyclists by law to use bike trail only in congested areas (West Shore). Safety issue, unless special event.
- Flashing lights at crossing
- Extend Trail to Rubicon, please!
- Please extend bike trail to Rubicon on west shore
- Great trails thanks!
- Love the trail! Clean & pleasant Thanks!
- Great Trails!
- 1.How come people park in bike lane? 2.Why do I have to cross road to stay on trail? 3.Why isn't it continuous? 4.Why does it say bike lane when there isn't even a shoulder to ride in?? 5.Ketchum Idaho has a nice bike trail. Think I rather spend my vacations dollars there.
- Love the trail wish it went all around the lake.
- love the trail
- love the trails!
- More paved bike trails

Survey site: Incline Beach

- Make beaches public
- TRPA-Make tree cutting process easier
- need to make the tree cutting process easier
- More bike trails!!
- Sidewalks should be for walking-bikes should be on street
- keep it up
- Concern: Overcrowding
- Love the trail
- loved 4th of July activities (all Week)!
- Thank you The volunteers were great!
- Would love to see the trail or sidewalks continue up to ski way Thanks for the great trail
- Great trails!

Survey site: Elk Point Road

- Move bike lanes share the road signs
- more trails on Nevada side some dangerous areas
- more bike paths
- Beautiful

Survey site: El Dorado Beach

- more trails good work so far
- Please repair pot holes
- keep it up more trails need a shoulder on busy to ride around lake
- bike trails make both motorist and cyclist happy
- very happy with bike route
- more train
- enjoy the trails and bike paths

- more bike trails
- love trails make more of them
- fix the potholes
- keep Tahoe clean
- very bad cracks in trails
- would have loved a continuous bike trail or better mapping
- love the trails
- have mandatory bike days!
- better sidewalks
- Please make better bike trails so we can stay off the highway all along 50 Thanks
- paved bikeways are great!
- More trails
- bike education-bikers should shout as approaching walkers from behind
- finish bike trail on 50 to state line or document safe alt route
- Unknown
- Trail-wise keep up the good work!
- Please complete the bike trail (Stateline to the Y)

Survey site: Camp Richardson

- ban cars/trucks from the basin
- would like more paved bike trails!
- MORE TRAILS(PAVED)
- gaps in asphalt need to be filled next to hwy 89
- more trails!
- I love it here could be heaven
- Go Tahoe!
- NO FIRES! NO CARS!
- Keep up good work!
- would be nice to have yellow line painted on whole bike trail please! (need more bike trails in basin)
- love the bike trails
- more bike trails
- resurface the trails & expand off vehicle road trails
- more trails needed
- love the trail! Thanks!
- Terrific Trails!
- THANKS!

Survey site: National Avenue

- Thank you for doing this.
- Please make the walking path
- a lot vs. enjoy the diet in the Nordic center area. Please No Paving!!
- Lake lacks public access possibilities
- bike trail would be awesome great to get more cars off the road
- bike trail would be great to Tahoe City
- Thanks for the Lake

Survey site: Lake Forest Road

- build more bike paths maybe a class 2
- Keep up good work!
- keep Tahoe blue and in grade

- love to see the trail extended
- We need type/class2 bike paths
- Maintenance of paths existing and new
- more trails extend to Truckee complete loop around the lake
- Bikers watch for walkers they have equal rights on the trail I favor bike trails as long as they are called walking/bike trails bikers need to watch out for walkers bikers from Safeway to dollar point the most polite bikers from fanny bridge to alpine are the rudest I won't walk along the river because the bikers think they own the road
- please extend the bike path for safety reasons
- more trails on roads
- love the bike trails free from traffic
- Class 1 bike trail and bike friendly bus around the lake Why spend all this $$ for no trans/rec. benefit?
- DO IT!!
- make it longer
- I love the class 1 trail
- I use roads and streets not trails
- More bike trails
- Great having the trails SAFER!
- Love the trail to Tahoe City Use it as much of the year as possible
- please connect class 1
- All for it expanding to TV
- would love a bike lane around the lake

Survey site: 64-Acre Tract

- Bocce Rec ctr
- bike
- Great Work!
- Cracks along Truckee are too deep hard on bikes and body
- More Benches
- The trails are Great! I think they're well maintained I use the trail at least once each visit.
- "Bike Path" through Homewood too narrow-crossing at Homewood ski parking lot-unsafe
- Thanks a the waxe
- Wonderful!
- Keep building walk/bike paths- off roadway as possible - safer more public transit too!
- Bike trails are very important!
- Great Trails!
- We love the trail 3rd time on it this trip We have run walked and biked it
- Keep Tahoe Blue
- Biking is awesome
- SKATE PARK!!
- night safer passing
- Thank you for the nice bike paths
- Welcome path- more consideration for walkers won't walk river path - bikers will run you over
- love the trails can you make them go all around the lake?
- beautiful walk!
- great trails! Love the ride!
- complete trail to Homewood
- Awesome!
- more signs explaining trail etiquette (right of way)
- bike trail to Kings beach along Truckee squaw

- look forward to the bike path going part TC down at the water (past Commons Beach)
- We love the bike trail!
- Thanks!
- Thanks 4 the trail!
- via trail keep adding
- longer bike trails
- Please make the trail longer! I love it!
- the bike trail is a spectacular amenity! I'd love to see it extended
- Thanks!
- Benches would be great
- We love the trails!
- We love the trail! I'm old enough to remember no trail
- Thanks for the great trails!
- Thanks for being here!

Survey site: Hidden Beach

- Keep Tahoe, Tahoe blue! More Baths
- Build the Trail!
- Lets go swimming!
- Need to have paved path for biking!
- more parking
- better parking for visitors
- Parking/access?
- Put in a bike trail for safety
- Like idea of safe bike trail ESP Nevada side of lake!

List of Bike Monitoring Training and Equipment

TRAINING:

1) Set up:
   a) About 30 minutes to set up. More if you need to scout a spot.
   b) Pick a spot where people are stopping anyway.
   c) Set up in a way where people can pull off the trail to take the survey.
   d) Organizer (TCORP) should check all spots with appropriate personnel before the survey.

2) Survey:
   a) Get four surveys on clipboards ready with pencils.
   b) Only ask ONE person from travel party – adult
   c) VERY IMPORTANT: Only ask adults to take survey, no one under 18.
   d) Randomization. Surveyors need to ask EVERY GROUP who passes to take the survey, regardless of their demeanor, gender, speed, talking on cell phone, etc. If people are passing by too quickly and you cannot ask everyone, ask every THIRD travel party to take the survey. Do not deviate from this sample rate.
   e) Ask "Would you like to take a survey about bike trails today". (so that people realize it's not a marketing survey)
   f) Might have to remind people to do the back of the survey.

3) Counts:
   a) Counts—do walkers and bikers separately. Third click for "other".
   b) Include wheelchairs as walkers.
   c) Count people *every time* they pass by, in both directions.
   d) Make sure to record numbers of walkers, bikers, and "other" every hour.

EQUIPMENT

Volunteers need:
- Clipboards--4
- folding chairs
- folding table
- hats
- water
- hammer or mallet
- beach umbrella (optional).
- Digital camera (optional—but great if you can take some pictures for the report).

Supplied:
- Clipboards (only for those that need it)
- Surveys
- Pencils
- Signs
- Clicker counters
- Counting sheets
- Waiver of liability forms

Appendix E

Tahoe Coalition of Recreation Providers
Bike Trail User Survey

1. How are you using the trails today?

   - Bicycling
   - Skates/blades
   - Walking/Jogging

2. How far do you plan on traveling on your walk/ride today?

   - Less than 1 mile
   - 1-2 miles
   - 3-5 miles
   - More than 6 miles

3. Why are you making this trip today? (*record all that apply*)

   - Recreation – biking only
   - Recreation – biking to recreation destination
   - Commuting
   - Errands
   - Shopping
   - Other _____

4. Did you start your trip from your place of lodging/home or did you drive to the trail?

   - Start from lodging/home
   - Drive to trail

5. How do you anticipate you would be traveling if this trail did not exist?

   - Biking on roadway
   - Skates/blades
   - Walking/jogging
   - Car/truck
   - Bus
   - Would not make trip

6. How many people are in your travel party at Lake Tahoe today (including you)?

   _____ # of people under age 18
   _____# over age 18

7. Which of the following best describes your residency in the Tahoe Basin?

   - Resident
   - Seasonal Resident
   - Visitor

8. Visitors/seasonal resident, please describe your stay here in Tahoe:

   __ Total days in Tahoe this year
   __Total number of trips to Tahoe this year

9. Where are you staying/living in the Tahoe Region?

   - North Shore
   - Truckee/Squaw
   - West Shore
   - Incline Village
   - South Shore
   - East Shore
   - Tahoe City
   - Not in Tahoe

10. What is your home zip code?

    _____

11. If you are a visitor to the Tahoe Basin, how long do you plan to stay?

    - For the day
    - 4 to 6 days
    - 1 month or more
    - 2 or 3 days
    - 1 to 3 weeks

TURN OVER PLEASE

12. If you are a visitor staying in Tahoe for more than one day, where are you staying?

    - ☐ Hotel/Motel
    - ☐ Rental
    - ☐ Friend or relative
    - ☐ Campground
    - ☐ Time-share/condominium

13. If you are a visitor, what are the primary purposes of your visit in Lake Tahoe? Choose three, rank 1-3 with 1 being the primary reason

___Beachgoing/swimming
___Hiking
___Bicycling (on paved surfaces)
___Mountain biking (not on paved surfaces)
___Motorized water sports (water skiing, jetskis, powerboating)
___Non-motorized water activities (sailing, fishing, canoeing, kayaking, windsurfing)
___Camping
___Gambling
___Shopping
___Visit cultural attraction (museum, historic site)
___Other _____

DEMOGRAPHIC INFORMATION

14. What is your gender?
    - ☐Male
    - ☐Female

15. What is your age?
    - ☐ 18-24
    - ☐ 24-35
    - ☐ 35-50
    - ☐ 50-65
    - ☐ Over 65

16. Which of the following best describes your household?

    - ☐ Single, no children
    - ☐ Couple, no children
    - ☐ Household with children
    - ☐ More than one adult, no children

17. What was your total household income (before taxes) in 2006?

    - ☐ Under $20,000
    - ☐ $20K - $29K
    - ☐ $30K - $39K
    - ☐ $40K - $49K
    - ☐ $50K - $74K
    - ☐ $75K - $99K
    - ☐ $100K - $149K
    - ☐ $150K or more

18. What is the highest level of education that you have completed?

    - ☐ Have not completed high school
    - ☐ High school graduate
    - ☐ Some college or technical training
    - ☐ College graduate
    - ☐ Graduate degree

19. Which of the following best describes your ethnic background?

    - ☐ Mexican-American
    - ☐ Other Hispanic
    - ☐ Caucasian/White
    - ☐ Asian/Pacific Islander
    - ☐ African/American/African
    - ☐ American Indian
    - ☐ Other _____

20. If you are not a permanent United States resident, what is your country of origin?

    _____

21. Do you have any comments, suggestions, or concerns?

    _____
    _____

THANK YOU for your help! Enjoy the trails.
If you would like a summary of the results of this survey please contact the TRPA (775) 588-4547.

Counting Sheet

Bike, Walk Counts
July 5, 2007

Location: _____ (describe precisely).

10:00 – 11:00 am

Bikes	Walkers	Other

11:00 – 12:00 pm

Bikes	Walkers	Other

12:00 – 1:00 pm

Bikes	Walkers	Other

1:00 – 2:00 pm

Bikes	Walkers	Other

Results from Sawmill Trail Bike Counts

Memo

Stantec

To:	Brendan Ferry El Dorado County DOT	From:	Sarah McIlroy, PE Stantec Consulting Inc.
File:	184151204	Date:	September 6, 2007

Reference: Sawmill Bike Path
Pre-Construction User Monitoring Results

INTRODUCTION

The purpose of this Memorandum is to summarize the findings of the pre-construction user count and survey monitoring data for the Sawmill Bike Path project in El Dorado County. The pre-construction monitoring was completed according to the *Sawmill Bike Path Monitoring Plan Amendment*, August 2007.

The Sawmill Bike Path Project consists of a Class I bicycle trail from the intersection of US Highway 50 and Santa Fe Road (end of the existing Pat Lowe Memorial Bike Trail) to the intersection of US Highway 50 and Sawmill Road (see Figure 1).

The County conducted user monitoring at the intersection of the Sawmill Bike Trail and Santa Fe Road. This location will allow for comparison of future/post-construction bike trail use. The purpose of the monitoring efforts is to assist with assessing the utilization of the bike trail. Bicycle and pedestrian counts were performed, and surveys were administered to determine user types. Data and their related parameters were compiled into a spreadsheet to track performance. Additionally, a bike trail user survey was administered to determine the types of users on the bike trail.

METHODOLOGY

A bike path user survey was administered by Stantec staff on Saturday, August 25, 2007 and Tuesday, August 28, 2007. Personnel were positioned at the head of the trail near the intersection of Highway 50 and Santa Fe Road. The times selected to conduct the survey were based upon assumed peak usage hours. The weekend surveys were conducted between the midday hours of 10:00 am and 2:00 pm. The weekday surveys were conducted between the morning hours of 7:00 am and 10:00 am and between the evening hours of 4:00 pm and 7:00 pm.

RESULTS

The results are discussed below by user counts and user survey.

Reference: Sawmill Bike Path
Pre-Construction User Monitoring Results

User Count Results

The user count result data sheets are included in Attachment B and a summary of the results are provided below.

Weekend Midday User Count Summary:

Cyclists	33
Pedestrians	0
Other	1
Total	34

Note that 11 of the users were seen biking on Highway 50 during the monitoring effort.

Other users could be skateboarders, rollerbladers, scooters, etc.

Weekday Morning and Evening User Count Summary:

	Morning 7am – 10 am	Evening 4pm – 7pm
Cyclists	4	9
Pedestrians	4	0
Other	0	1
Total	8	10

Note that 23 of the users were seen biking on Highway 50 during the monitoring effort.

Other users could be skateboarders, rollerbladers, scooters, etc.

Weekend Mid-Day. A total of 34 people were observed using the bike path between the hours of 10:00 am and 2:00 pm. The flow was relatively steady, with an average of 11 users per hour between 10:00 am and 1:00 pm. Bike trail utilization dropped dramatically in the last hour from 1:00 to 2:00 pm, when only two persons were observed. In general, the path was utilized more in the southbound direction (24) than in the northbound direction (10). Nearly 28% of the cyclists counted utilized Highway 50, rather than the trail. No pedestrians were observed using the path at this location; however, one person was seen riding scooter in the southbound direction.

Reference: Sawmill Bike Path
Pre-Construction User Monitoring Results

Weekday Morning. A total of eight people were observed using the bike path during the morning hours between 7:00 am and 10:00 pm. The path was utilized more frequently in the southbound direction (5) than in the northbound direction (3). Four pedestrians were observed during the weekday morning hours. The busiest hour observed was from 9:00 am to 10:00 am, with a total of four users. There was very little bike path utilization in the early morning hour between 7:00 am and 8:00 am. An equal number of users were seen utilizing the bike path (8) as were observed utilizing the bike lane along Highway 50.

Weekday Evening. A total of ten people were observed using the bike path during the evening hours between 4:00 pm and 7:00 pm. The path was utilized more frequently in the northbound direction (7) than in the southbound direction (3). No pedestrians were observed during the weekday evening hours. The busiest hour observed was from 6:00 pm to 7:00 pm, with a total of seven users. There was no bike path utilization in the evening hour of 4:00 pm to 5:00 pm. More users were seen utilizing the bike lane along Highway 50 (15) than were observed using the bike path (10).

User Survey Results

A blank user survey is shown in Attachment A and the completed user surveys are included in Attachment D. Attachment C consists of pie charts summarizing the user surveys by weekend and weekday.

Bike Path Utilization. User surveys from both the weekend and weekday study periods indicate that the bicycle path is most commonly utilized for recreational cycling, as opposed to walking, skating, or other recreational uses. Seventy percent (70%) of those surveyed were in the area for the purpose of road cycling or mountain biking. Only two of the people, both of whom were surveyed during the weekday, were using the path for commuting to or from work, in addition to recreational use. This trend towards recreational use, rather than commuter use, may provide explanation to why the majority of cyclists planned on traveling 6 miles or more on the weekend, and cyclists traveling during the week expected to travel only one to two miles. The majority of those surveyed (83%) were starting their trip from home, while few (17%) drove to trail. Most users stated that if the trail did not exist they would cycle on area roadways or not make the trip at all.

User Demographics. Over fifty percent (50%) of the bike path users surveyed during the weekend study period reside in the Tahoe Basin, primarily in the South Lake Tahoe and North Lake Tahoe areas. Ninety-five percent (95%) of those from the Basin originated from the South Lake Tahoe/South Shore area. The other fifty percent (50%) of weekend users surveyed were from surrounding areas such as Folsom, and from

more distant areas of California, such as Orange County. Weekday trends leaned more towards local use, with more than 75% of those surveyed on the trail originating from the surrounding Lake Tahoe Basin. The representative user household is comprised of couples or singles with no children in the home (75%). The majority of those surveyed were males (67%). One half of users surveyed were under the age of 36, and as many as one-third were over the age of 50. Eighty-four percent (84%) of those surveyed hold a bachelor's degree or higher, with the majority of them (59%) earning over $50,000 per year.

CONCLUSIONS

It should be noted that any user count survey data trends are limited by the number of data points. Comparison of user counts collected and user types observed before/during construction to those observed during late Summer 2008 and Spring 2009 will document the pre-project conditions. The user counts and survey that are obtained before/during construction will also include use on Highway 50.

List of Figures
1. Project Location Map

List of Attachments
A. Blank User Survey
B. Completed Field User Count Data Sheets
C. Pie Charts Summarizing User Survey Data
D. Completed User Data Survey Forms

STANTEC CONSULTING INC.

Sarah A. McIlroy, PE
Senior Associate
sarah.mcilroy@stantec.com

c. Alfred Knotts, El Dorado County DOT
John Klemunes, Stantec

Project Location

Proposed Bike Path Alignment

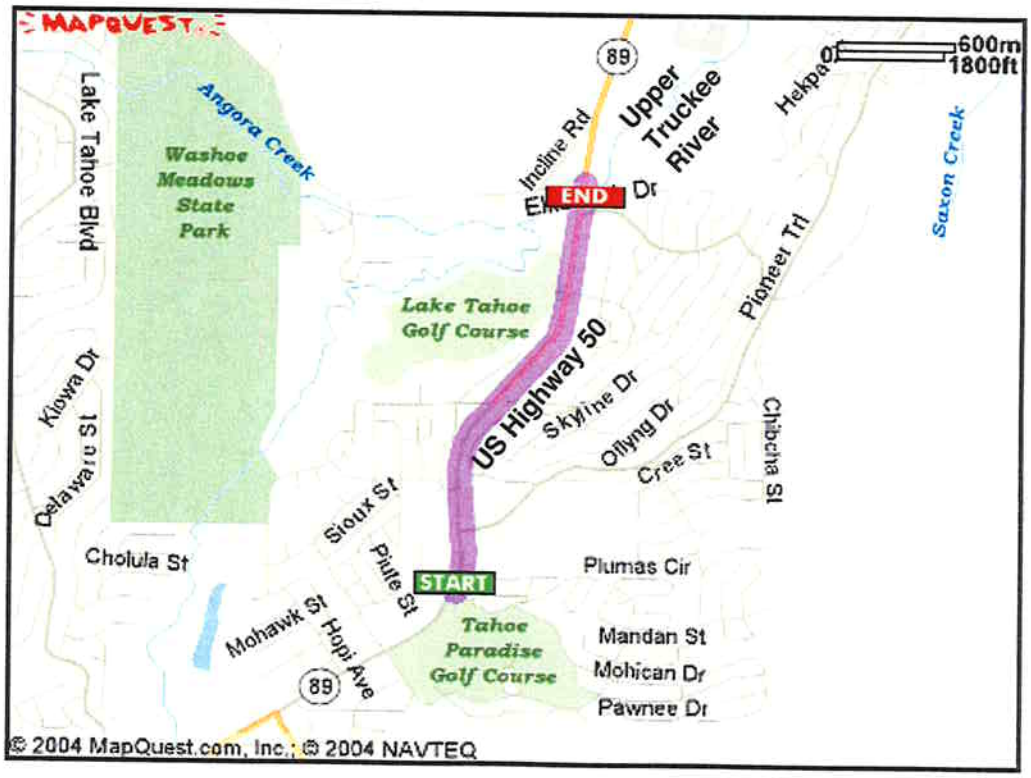


Figure 1

ATTACHMENT A

BLANK USER SURVEY

Sawmill Bike Path Monitoring Plan
Bike Trail User Survey
August 2007

1.	**How are you using the trails today?**		9.	**Where are you staying/living in Tahoe Region?**	
	☐ Bicycling ☐ Skates/Blades	☐ Walking/Jogging		☐ North Shore ☐ Truckee/Squaw ☐ West Shore ☐ Incline Village	☐ South Shore ☐ East Shore ☐ Tahoe City ☐ Not in Tahoe
2.	**How far do you plan on traveling on your walk/ride today?**		10.	**If you are a visitor, what are the primary purposes of your visit in Tahoe?**	
	☐ Less than 1 mile ☐ 1-2 miles	☐ 3-5 miles ☐ More than 6 miles		☐ Hiking ☐ Cycling (paved roads) ☐ Mountain biking ☐ Motorized water sports	☐ Non-motorized water activities ☐ Camping ☐ Gambling ☐ Other:
3.	**Why are you making this trip today?**		11.	**What is your gender?**	
	☐ Recreation ☐ Commuting to/from work	☐ Running errands ☐ Shopping ☐Other:		☐ Male	☐ Female
4.	**Did you start your trip from home/lodging or drive to trail?**		12.	**What is your age?**	
	☐ Home/lodging	☐ Drive to trail		☐ 18-24 ☐ 24-35 ☐ 35-50	☐ 50-65 ☐ 65-up
5.	**How would you be traveling if this trail didn't exist?**		13.	**What is your household income?**	
	☐ Cycling on roadway ☐ Automobile	☐ Public transportation ☐ Would not make trip		☐ Under $20K ☐ $30K-$39K ☐ $50K-$74K	☐ $20K-$29K ☐ $40K-$49K ☐ $75K or more
6.	**Is your primary residence in the Tahoe Basin?**		14.	**Which best describes your household?**	
	☐ Yes	☐ No		☐ Single, no children ☐ More than one adult, no children	☐ Couple, no children ☐ Household with children
7.	**What is the highest level of education that you have completed?**		15.	**Do you have any comments, suggestions, or concerns?**	
	☐ High school graduate ☐ Some college or technical training	☐ College Graduate ☐ Graduate Degree			
8.	**What is your zip code?**				

ATTACHMENT B

COMPLETED FIELD USER COUNT DATA SHEETS

Bicyclist/Pedestrian Counts
Date: 8/25/07 Day of Week: Saturday
Location: Hwy 50 & Santa Fe @ Trailhead
Field Staff: Kim Garrett, Spencer Larson

Weekend Midday User Counts		
10:00 – 11:00 am		
Bicyclists	Pedestrians	Other
Northbound: 2 Southbound:7	0	0
11:00 am – 12:00 pm		
Bicyclists	Pedestrians	Other
Northbound: 7 Southbound: 5	0	0
12:00 – 1:00 pm		
Bicyclists	Pedestrians	Other
Northbound: 0 Southbound: 11	0	0
1:00 – 2:00 pm		
Bicyclists	Pedestrians	Other
Northbound: 1 Southbound: 0	0	1

Bicyclist/Pedestrian Counts
Date: 8/28/07 Day of Week: Tuesday
Location: Hwy 50 & Santa Fe @ Trailhead
Field Staff: Kim Garrett, Spencer Larson

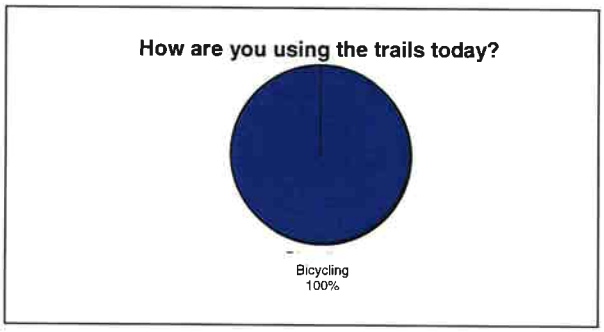
Midweek A.M. User Counts		
7:00 – 8:00 am		
Bicyclists	Pedestrians	Other
Northbound: 0 Southbound: 1	0	0
8:00 – 9:00 am		
Bicyclists	Pedestrians	Other
Northbound: 0 Southbound: 1	1 1	0
9:00 – 10:00 am		
Bicyclists	Pedestrians	Other
Northbound: 1 Southbound: 1	2	0

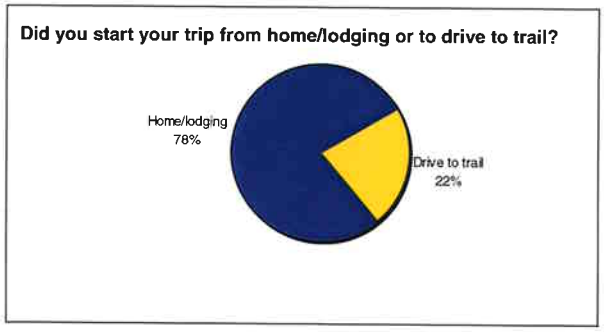
Midweek P.M. User Counts		
4:00 – 5:00 pm		
Bicyclists	Pedestrians	Other
Northbound: 0 Southbound: 0	0	0
5:00 – 6:00 pm		
Bicyclists	Pedestrians	Other
Northbound: 2 Southbound:	0	1
6:00 – 7:00 pm		
Bicyclists	Pedestrians	Other
Northbound: 4 Southbound: 3	0	0

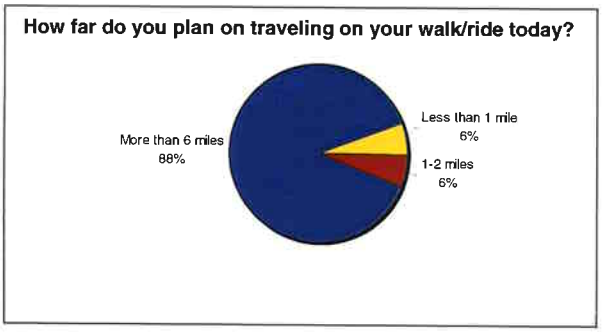
ATTACHMENT C

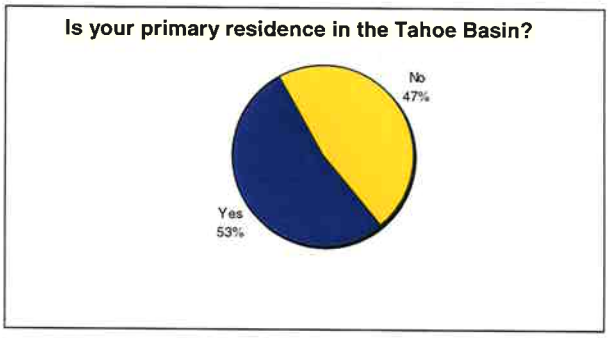
PIE CHARTS SUMMARIZING USER SURVEY DATA

Sawmill Bike Path User Survey
Saturday, August 25, 2007, 10:00 AM – 2:00 PM







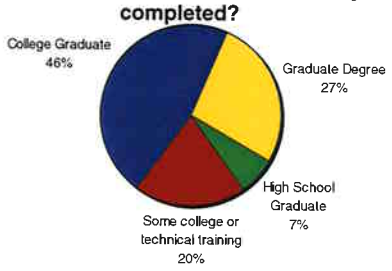


Charts were compiled by a survey of 17 respondents.

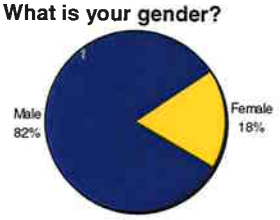
Sawmill Bike Path User Survey

Saturday, August 25, 2007, 10:00 AM – 2:00 PM

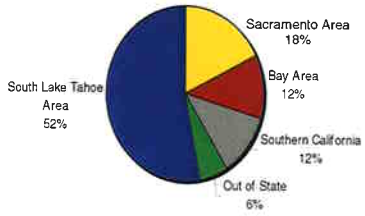
What is the highest level of education that you have completed?



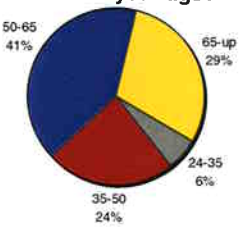
What is your gender?



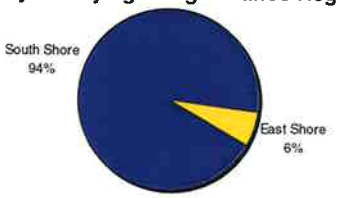
Region according to zip code?



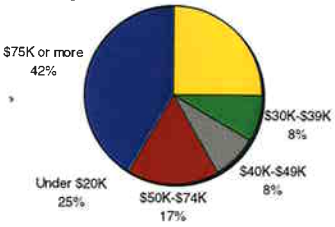
What is your age?



Where are you staying/living in Tahoe Region?



What is your household income?



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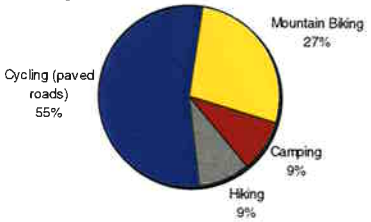
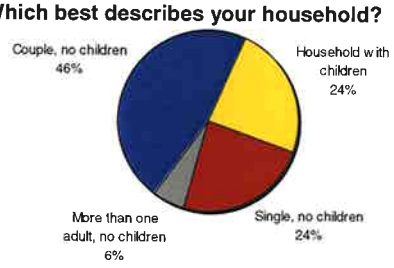


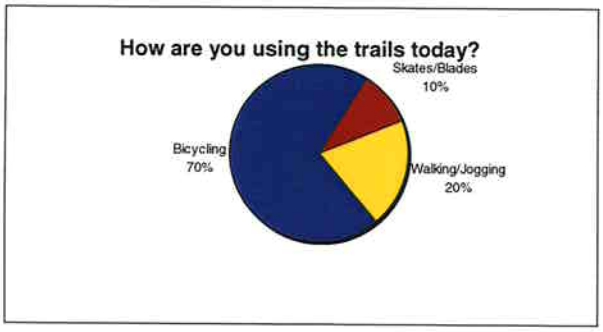
Which best describes your household?

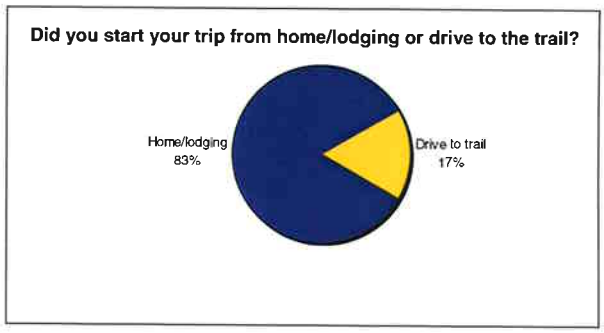


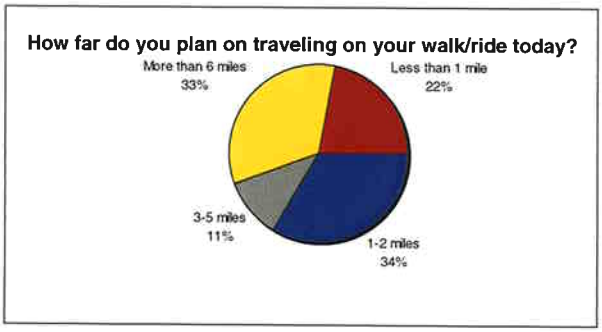
Charts were compiled by a survey of 17 respondents.

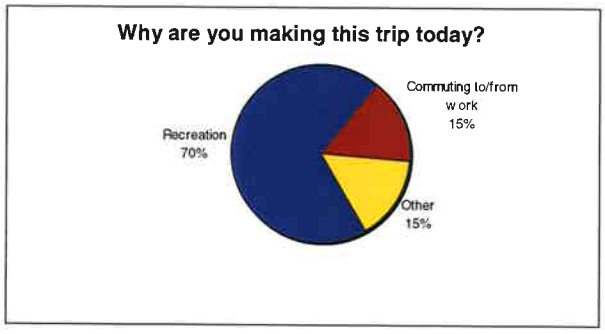
Sawmill Bike Path User Survey

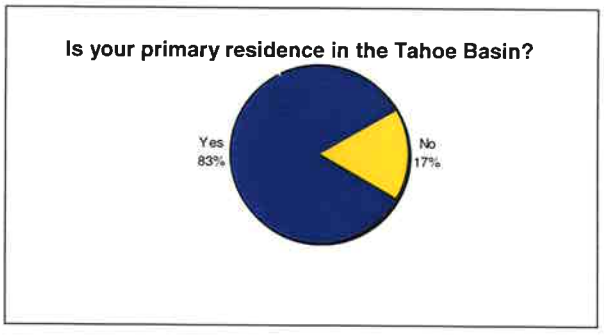
Tuesday, August 28, 2007, 7:00 AM – 10:00 AM & 4:00 PM – 7:00 PM











Charts were compiled by a survey of 12 respondents.

Sawmill Bike Path User Survey

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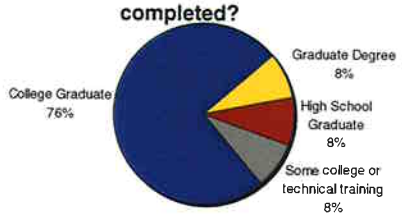

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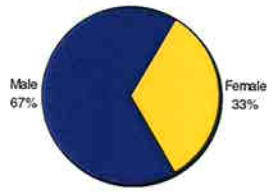

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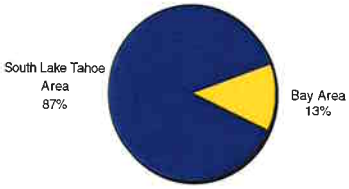

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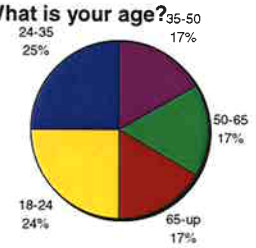

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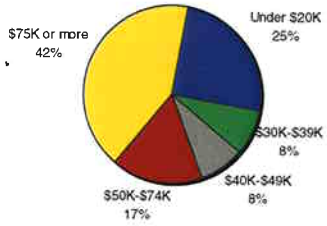

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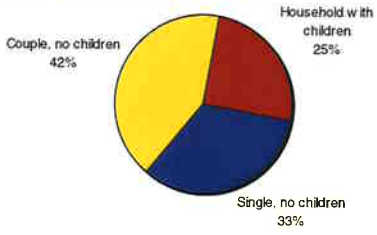


Charts were compiled by a survey of 12 respondents.

Tahoe Transportation DISTRICT

Connecting our communities

February 13, 2015

Friends of the West Shore
Attn: Susan Gearhart and Jennifer Quashnick
PO Box 5095
Tahoe City, CA 96145

Re: State Route 89/Fanny Bridge Community Revitalization Project – Request for Extension of Public Comment Period for Draft Environmental Impact Report/Environmental Impact Statement/Environmental Assessment (DEIR/EIS/EA)

Dear Ms. Gearhart and Ms. Quashnick:

This letter has been prepared in response to your correspondence dated February 6, 2015 that requests an extension of the sixty (60) day public comment period for the State Route 89/Fanny Bridge Community Revitalization Project DEIR/EIS/EA, which is scheduled to conclude on February 17, 2015. The stated rationale for the request is that "additional information" will be discussed at a public workshop scheduled for February 26, 2015. TTD and project partners are conducting this workshop to facilitate continued dialogue between the public and the project proponents on the following design elements:

- Proposed bridge aesthetics
- Bicycle and pedestrian enhancements
- Proposed roundabouts
- Streetscaping ideas

The workshop will provide an aerial view of the project area, still images, streetscaping examples, and example design photos. All of these reflect visualization of project elements that are described and addressed in the Draft EIR/EIS/EA and presented at the three public hearings conducted during the comment period. They do not provide substantial new information or introduce new project elements.

The purpose of an environmental document public review period is to: share expertise, disclose agency analyses, check for accuracy, detect omissions, discover public concerns, and to solicit counter proposal (see CEQA Guidelines Section 15200). This review period is not intended to require a halt in the planning activities for the project (CEQA Guidelines Section 15203[b]). The purpose of the February 26, 2015 workshop is to provide an opportunity for the public and Project Development Team to continue the dialogue about project design. Given that the workshop will not be presenting new project elements not already contained in the DEIR/EIS/EA and is not intended to solicit comments on the adequacy of the DEIR/EIS/EA TTD, as the CEQA lead agency, plan to maintain the DEIR/EIS/EA schedule and conclude the sixty (60) day public comment period on February 17, 2015.

128 Market Street Suite 3F Stateline, Nevada 89449 | PO Box 499 Zephyr Cove, Nevada 89448
775.589.5500 Fax 775.588.0917 tahoetransportation.org

Thank you for your continued interest in this very important Regional Transportation Plan and Environmental Improvement Program project. Please do not hesitate to contact me should you have any additional questions, comments, and/or require additional information.

Sincerely,

Alfred Knotts

ec: Carl Hasty, TTD; Brian Judge, TRPA; Matthew Ambroziak, CFLHD

MOBILITY 2030 for the next generation

LAKE TAHOE REGIONAL TRANSPORTATION PLAN

FINAL

August 27, 2008

2008 TMPO TransCAD Modeling and Network Analysis

The 2008 RTP impact on travel behavior is assessed at the regional scale using the TMPO TransCAD Tour-Based Travel Demand Model. The TransCAD model identifies the 2008 RTP impact on region-wide circulation patterns and Vehicle Miles Traveled (VMT). The socio-economic data inputs for the regional network travel demand model were derived from the most recent growth allocations (2012, 2017, 2022 and 2030) identified through the TRPA Regional Plan (Pathway). Both non-exempt projects required modifications to the 2030 TransCAD street networks. New roads or road extensions were coded by creating new links; widening projects required re-coding the number of lanes on affected links; channelization improvements entailed increasing the coded lane capacities; and passing lanes and/or roadway improvements/upgrades were reflected by increasing the average free flow speeds on affected links.

Non-Exempt Projects

The Lake Tahoe Region is subject to a transportation conformity analysis on specific types of projects (termed "non-exempt projects") that are included within the planning and programming documents. Exempt projects are defined in 40 CFR 93.126 and generally include projects that will not increase roadway capacity or VMT, safety improvements, maintenance of existing transit systems, such as bus replacement and the addition of bus shelters to be implemented in the Lake Tahoe Region. The following non-exempt projects have been identified for the Tahoe Region. (A complete list of projects can be found on page 54 of the RTP.)

U.S. Highway 50 Stateline Project

Scheduled for completion after 2022, this project will re-align U.S. Highway 50 near the casino corridor to improve bicycle, pedestrian and transit opportunities. The project straddles the California/Nevada Stateline area in El Dorado County, California and Douglas County, Nevada. It proposes to reduce the existing U.S. Highway 50 alignment to two eastbound lanes with westbound traffic redirected on Lake Parkway.

State Route 89 Realignment

Also scheduled for completion after 2022, this project addresses seasonal traffic congestion at the Tahoe City "Wye" in Placer County and the structural and seismic deficiencies of the Fanny Bridge over the Lower Truckee River. Fanny Bridge will be upgraded to provide improved pedestrian and bicycle safety with a new State Route 89 alignment through the 64-acre USFS (U.S. Forest Service) parcel located west of the existing SR 89.

Based on the results of the TransCAD modeling and street network analysis, the resulting increase in daily VMT and vehicle trips from the two non-exempt projects have been estimated at 15,530 and 2,283 respectfully for the forecast year of 2030. In order to identify the county's (El Dorado and Placer) VMT and vehicle trip change contribution as inputs to the on-road source emission estimates created by the two projects, the TMPO staff utilized the TransCAD model to identify El Dorado and Placer VMT and vehicle trip changes for the 2030 forecast year. Based on the results of this analysis the El Dorado and Placer County increases in VMT and vehicle trips were computed as follows for the 2030 forecast year:

El Dorado County 2030 Forecast	Placer County 2030 Forecast
VMT +10,861	VMT +4,669
Vehicle Trips +1,553	Vehicle Trips +730

Figure 6.4

Reducing Greenhouse Gas Emissions at Lake Tahoe

The Lake Tahoe Region is particularly vulnerable to the impacts of global climate change, just as it is to other environmental impacts. The region's economy is highly dependent on the health of its environmental assets, including its substantial snowpack, a clear lake, and healthy forests, all of which will be negatively affected by warming temperatures.

Emissions from motor vehicles, including cars, buses and boats, are a leading source of greenhouse gas emissions in the Basin. Motor vehicle use has been identified as a major contributor to the loss of clarity of Lake Tahoe, contributing to runoff from roadways and the emission of nitrogen oxides and particulate matter, causing algae growth in the Lake. Since 1982, the TRPA has strived to meet two air quality threshold indicators: Vehicle Miles Traveled (VMT) and traffic counts. Both of these criteria should be reduced to 1981 levels. These threshold indicators are consistent with the goals of California's Global Warming Solutions Act (AB32) of 2006, which specifies that the state must reduce greenhouse gas emissions to 1990 levels by 2020. Vehicle Miles Traveled have been decreasing in the Lake Tahoe Region over the last five years, and traffic counts, which, for the purposes of the threshold indicator, are measured at a location in South Lake Tahoe, are also trending downward.

Because of the air quality thresholds and the intense focus on environmental health in the Lake Tahoe Region, the goals and policies of past regional plans and regional transportation plans have focused on reducing emissions from motor vehicles, and on shifting people out of their cars and into other, lower impact modes such as transit, bicycling, and walking. This Regional Transportation Plan continues this trend, with the majority of policies and projects encouraging transit and pedestrian-oriented development, constructing pedestrian and bicycling facilities, and strengthening the transit system. Those projects that are related to roadway improvements are limited to minor changes such as adding left-hand turn lanes or improving traffic signalization to provide for a more efficient use of the current roadway network. These projects relieve congestion without widening roadways or adding major capacity for motor vehicles.

Concurrent with the development of this regional transportation plan is a comprehensive revision and update to the regional plan for the Lake Tahoe Region. The regional plan outlines goals and policies for many resource areas in addition to transportation, and will examine land-use and building strategies that can reduce greenhouse gas emissions. The regional plan will include a region-wide analysis that looks at all aspects of the plan with respect to climate change, including transportation.

Projects that affect greenhouse gas emissions

In the area of transportation, most greenhouse gas emissions are associated with motor vehicle use. Therefore, projects that shift people out of cars and into other, lower-emission alternatives will reduce greenhouse gas emissions. The projects proposed as part of Mobility 2030, the Lake Tahoe Regional Transportation Plan, are grouped below into three categories: projects that will likely reduce greenhouse gas emissions, projects that will likely increase greenhouse gas emissions, and those where the effect on emissions is unclear or may be neutral.

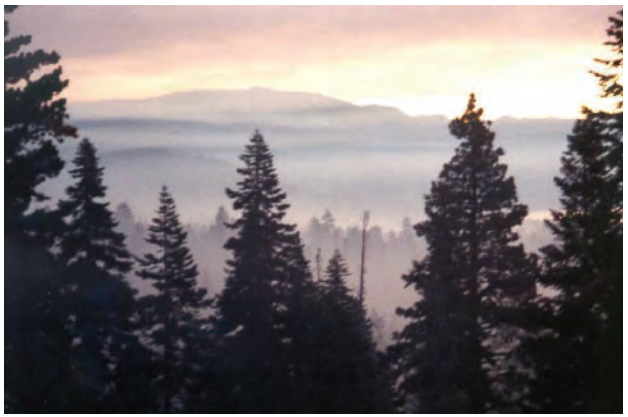
Projects that were placed in the "reduce" category are those that aim to reduce vehicle use or vehicle emissions as a primary goal. For instance, all bicycle trails and pedestrian improvements are considered to reduce emissions, since the primary goals of these projects getting drivers to walk or bicycle for trips they otherwise would have made by motor vehicle, thus reducing air quality emissions. Likewise, capital improvements in bus fleets were considered to reduce greenhouse gas emissions, since one of the main purposes of replacing buses is introducing newer, cleaner technologies to the fleets.

Projects included in the "increase" greenhouse gas emissions category are those that create capacity increases for motor vehicles. These capacity increases are still quite small, compared to those planned in larger, urban areas, but they create additional lane capacity for several thousand feet of roadway in order to alleviate reoccurring congestion

at key points. Aviation service enhancements are also considered to increase greenhouse gas emissions as air travel is one of the most energy-intensive forms of travel.

Projects that are in the "unclear" column include certain transit and roadway improvement projects. These projects may reduce greenhouse gas emissions in some ways, but could increase them in others. New transit services get people out of their cars, but if older buses with out-of-date emissions technology are used to provide that transit service, then ridership must be high enough to outweigh the impacts of the additional bus emissions. As capital improvements are made to bus fleets, however, emissions will be reduced. Likewise, roadway improvements can decrease greenhouse gas emissions by reducing idling times, but at the same time they can increase the capacity of a roadway, allowing and encouraging more vehicles to use the roadway system. The roadway capacity increases in the 2008 RTP are intended to encourage greater flexibility to implement alternative mode options.

As a percentage of total project cost, projects that will likely reduce greenhouse gas emissions are estimated at approximately 57% of expenditures; those that will likely increase greenhouse gas emissions are approximately 1% of expenditures; and those whose effect is unclear make up 42% of expenditures. See Figure 6.6.



Policies that affect greenhouse gas emissions

Most of the goals and policies in the Regional Transportation Plan focus on reducing environmental impacts of motor vehicles, including emissions of greenhouse gasses.

GOAL #1 Pedestrian Transit Oriented Development (PTOD) Plan for and promote land use changes and development patterns consistent with the Regional Plan that encourage the development of walkable, mixed-use centers that support transportation enhancements and environmental improvements while improving the viability of transit systems.

GOAL #2 Pedestrian/Bicycle Friendly Communities Design an atmosphere elevating bicycle and pedestrian usage to the primary modes of transportation at Lake Tahoe.

GOAL #3 Utilization of Intelligent Transportation Systems (ITS). Technology shall be considered, implemented and used to increase usage of alternative modes.

GOAL #4 Actively pursue programs that promote the use and expansion of mass transit.

GOAL #5 Participate in state and local transportation planning efforts to ensure coordination and consistency in the transportation system, and to strengthen inter and intra-regional transportation.

GOAL #7 Develop parking management strategies for the Tahoe Region.

GOAL #8 Manage and respond to transportation demand through traffic management plans.

GOAL #10 Improve the mobility of the elderly, handicapped and other transit-dependent groups.

GOAL #12 Develop an on-going source of regional revenue to fund alternative transportation operations and maintenance.

For the full text of goals and associated policies, please refer to Chapter 2.

Figure 6.6. Regional Transportation Plan Project Strategies, Costs, and Greenhouse Gas Emission Effects

Project Strategies	Reduce GG	Increase GG	Unclear	Total
U.S. 50 Bicycle and Pedestrian Improvement Project(s)	$48,000,000			$48,000,000
Kings Beach Commercial Core Improvement Project	$50,000,000			$50,000,000
State Route 89 Realignment Project		$50,000,000		$50,000,000
Tahoe City Transit Center	$7,000,000			$7,000,000
U.S. 50 Stateline Corridor Project			$65,000,000	$65,000,000
Waterborne			$14,000,000	$14,000,000
Transit Strategies				
BlueGo Service Operational Enhancements			$4,073,400	$4,073,400
BlueGo Service Capital Enhancements	$4,740,000			$4,740,000
BlueGo Maintenance Facility			$7,000,000	$7,000,000
TART Service Operational Enhancements			$813,000	$813,000
TART Service Capital Enhancements	$281,300			$281,300
Lake Lapper Capital			$30,000	$30,000
Lake Lapper Operational			$240,000	$240,000
Aviation Capital		$1,500,000		$1,500,000
Aviation Operational		$800,000		$800,000
Bike and Pedestrian Strategies				
Pioneer Trl - from Lake Tahoe Blvd./US Hwy 50 to - Ski Run Blvd	$3,560,000			$3,560,000
Harrison Ave - from Lakeview Ave to Los Angelese Avenue	$450,000			$450,000
Lake Tahoe Nevada State Park - From Incline Village to Sand Harbor	$7,920,000			$7,920,000
Sawmill Rd - from Lake Tahoe Blvd to Us Hwy 50	$3,680,000			$3,680,000
Al Tahoe Trl - from Lake Tahoe Blvd/US Hwy 50 to Al Tahoe Trl	$500,000			$500,000
Lake Tahoe Blvd - from Sawmill Road to D Street	$2,100,000			$2,100,000
US Hwy 50 - from Cave Rock to Zephyr Cove	$9,500,000			$9,500,000
US Hwy 50 - from Zephyr Cove to Roundhill/Elks Point Trail	$2,960,000			$2,960,000
USFS Trl. - from Spring Creek to Cascade Rd.	$3,840,000			$3,840,000
Dollar Hill Trl - from Dollar Hill to N. Tahoe Regional Park	$6,160,000			$6,160,000
OLD Hwy 50 ROW - from CSLT City Limits to Douglas County Line	$6,760,000			$6,760,000

Figure 6.6

Project Strategies	Reduce GG	Increase GG	Unclear	Total
OLD Hwy 50 ROW - from CSR 89-Meyers to CSLT City Limits	$9,480,000			$9,480,000
Lake Tahoe-Nevada State Park - from Incline Village to Sand Harbor	$990,000			$990,000
College Drive - from Mt. Rose Hwy to Village Blvd	$200,000			$200,000
NSR 207/Kingsbury Grade - from Basin Boundary/Spooner Summit to US Hwy 50	$12,320,000			$12,320,000
Brockway Summit - from Kings Beach/CSR 28 to Brockway Summit	$1,610,000			$1,610,000
NSR 28 - from Sand Harbor to Chimney Beach	$120,800			$120,800
CSR 89 - from Cascade to N. Emerald Bay	$196,400			$196,400
Homewood - from Tahoe Ski Bowl Way to Silver Street	$2,000,000			$2,000,000
Incline Village/NSR 28 - from Southwood to Country Club Drive	$300,000			$300,000
Nevada South Demo - from Stateline to Round Hill Pines Beach	$6,000,000			$6,000,000
Smart Streets - Complete Streets Strategies				
US 50 and Sierra Blvd. Intersection Improvements		$755,000		$755,000
US 50 Signal Syncronization (Meyers to Stateline)			$3,000,000	$3,000,000
US 50 and Apache Intersection Improvements		$320,000		$320,000
Meyers Highway Corridor Operations Study			$700,000	$700,000
Tahoe City Traffic Management Program			$550,000	$550,000
Intersection Detection Equipment (various Locations)			$900,000	$900,000
Changeable Message Signs (Various Locations)			$2,850,000	$2,850,000
Sierra Traffic Operation System (TOS) (ITS at Various Locations in CA)	$5,300,000			$5,300,000
Traffic Monitoring Stations (various locations)	$520,000			$520,000
Bike & Pedestrian Facilities O&M	$2,000,000			$2,000,000
Safety and Rehabilitation Projects (Minor Projects-NV)	$1,800,000			$1,800,000
Safety and Rehabilitation Projects (Minor Projects-CA)	$2,800,000			$2,800,000
Emergency Roadway Repair Program	$600,000			$600,000
Total Project/Program Costs in 2008 dollars	**$203,688,500**	**$53,375,000**	**$99,156,400**	$356,219,900
Percentage of Total Cost	57%	15%	28%	

Figure 6.6 cont.

California Department of Transportation
Division of Maintenance

Structure Maintenance and Investigations

BRIDGE

INSPECTION

RECORDS

INFORMATION

SYSTEM

The requested documents have been generated by BIRIS.

Records for “Confidential” bridges may only be released outside the Department of Transportation upon execution of a confidentiality agreement.

DEPARTMENT OF TRANSPORTATION
Structure Maintenance & Investigations

Bridge Number : 19 0033
Facility Carried: STATE ROUTE 89
Location : 03-PLA-089-8.48
City :
Inspection Date : 06/09/2014

Bridge Inspection Report

Inspection Type
Routine [X] FC Underwater Special Other

STRUCTURE NAME: TRUCKEE RIVER

CONSTRUCTION INFORMATION

Year Built : 1928
Year Widened: N/A
Length (m) : 37.2

Skew (degrees): 0
No. of Joints : 3
No. of Hinges : 0

Structure Description: Simply supported RC (5) T-Girder spans on RC 2 column bents and RC strutted abutments, all on spread footings.

Span Configuration : 4 @ 9.14 m

SAFE LOAD CAPACITY AND RATINGS

Design Live Load: MS-18 OR HS-20
Inventory Rating: RF=1.18 =>38.2 metric tons Calculation Method: LOAD FACTOR
Operating Rating: RF=1.96 =>63.5 metric tons Calculation Method: LOAD FACTOR
Permit Rating : PPPPP
Posting Load : Type 3: Legal Type 3S2: Legal Type 3-3: Legal

DESCRIPTION ON STRUCTURE

Deck X-Section: 0.1 m br, 8.8 m, 1.2m sw, 0.1 m br
Total Width: 10.2 m Net Width: 9.8 m No. of Lanes: 2 Speed: 25 mph
Min. Vertical Clearance: Unimpaired
Rail Code: 0000 Rail Description: C. WIN

DESCRIPTION UNDER STRUCTURE

Channel Description: compact clay and sand

NOTICE

The bridge inspection condition assessment used for this inspection is based on the American Association of State Highway and Transportation Officials (AASHTO) Bridge Element Inspection Manual 2013 as defined in Moving Ahead for Progress in the 21st Century (MAP-21) federal law. The new element inspection methodology may result in changes to related condition and appraisal ratings on the bridge without significant physical changes at the bridge.

INSPECTION COMMENTARY

SCOPE AND ACCESS

This inspection was completed in accordance with SM&I standards for a routine regularly scheduled evaluation. No direct channel access was possible due to water depth and velocity. The substructure and deck soffit were observed from the abutment corners.

SAFE LOAD CAPACITY

A Load Rating Summary Sheet dated 07/01/2009 and based on BDS analysis dated 01/05/1977 is on file for this structure. While this report does not include a check of that analysis, it does verify that the structural conditions observed during this inspection are consistent with those assumed in that analysis.

ELEMENT INSPECTION RATINGS AND COMMENTARY

Elem No.	Defect /Prot	Defect	Element Description	Env	Total Qty	Units	Qty in each Condition State St. 1	St. 2	St. 3	St. 4
	522		Deck Membrane	2	400	sq.m	400	0	0	0
		7000	Damage	2	2		0	0	0	2
12			Deck-RC	4	400	sq.m	390	10	0	0
	1120		Efflorescence/Rust Staining	4	10		0	10	0	0
	510		Deck Wearing Surface-Asphalt	4	400	sq.m	288	12	100	0
		3210	Delam./Pothole-AC (WS)	4	2		0	2	0	0
		3220	Cracking-AC (WS)	4	10		0	10	0	0
		3230	Effectiveness (WS)	4	100		0	0	100	0

(12-522)
The deck membrane is not available for direct inspection, but the damage noted below has compromised the integrity of the membrane as a whole.

(12-522-7000)
On the left side of Span 3 the membrane under the AC overlay exhibits failed section that has been patched with AC. See Photo #7.

(12)
The RC deck is covered with an AC overlay and is not available for direct inspection.

(12-1120)
Mild efflorescence is present at several locations on the soffit. The distress has remained stable since the previous inspection.

(12-510)
The AC overlay exhibits rutting in the wheel lines in both directions as well as a patched section and cracking over the abutment joints. A work recommendation to resurface the bridge deck has been entered.

(12-510-3210)
On the left side of Span 3 the AC overlay exhibits a failed AC section with patch. See Photo #7.

(12-510-3220)
The AC overlay over the joints exhibits transverse cracking. See Photos #5 and #6.

(12-510-3230)
The rutting in the wheel lines has diminished the effectiveness of the wearing surface.

110			Girder/Beam-RC	3	186	m	186	0	0	0
	1080		Delamination/Spall/Patched Area	3	20		20	0	0	0

(110)
The girders are structurally sound. The defects noted below do not affect the load capacity or servicability of the structure.

(110-1080)
The reinforced concrete girders exhibit several patched areas from previous spalling over the bents.

	521		Concrete Coat.(Meth/Paint/Seal)	2	150	sq.m	150	0	0	0
205			Column-RC	3	6	each	6	0	0	0

(205-521)
The RC columns have been fitted with fiberglass jackets. The jackets are in good condition.

(205)
No structural defects were noted in the columns.

215			Abutment-RC	3	21	m	1	20	0	0

ELEMENT INSPECTION RATINGS AND COMMENTARY

Elem No.	Defect /Prot	Defect	Element Description	Env	Total Qty	Units	Qty in each Condition State St. 1	St. 2	St. 3	St. 4
	1130		Cracking (RC and Other)	3	20		0	20	0	0
(215) The abutments are structurally sound. The defects noted below do not affect the load capacity or servicability of the structure.										
(215-1130) The abutments exhibit minor cracks and spalls with no exposed reinforcing.										
220			Pile Cap/Footing-RC	2	40	m	40	0	0	0
(220) No structural defects were noted in the footing.										
234			Pier Cap-RC	3	32	m	22	10	0	0
	1130		Cracking (RC and Other)	3	10		0	10	0	0
(234) The pier caps are structurally sound. The defects noted below do not affect the load capacity or servicability of the structure.										
(234-1130) The RC caps at Bents 2 and 4 exhibit rust staining, patches, map cracking, and efflorescence. See Photo #8. The RC cap at Bent 2 exhibits an incipient spall on the left side overhang. See Photo #9. The RC cap at Bent 4 exhibits a failed patch near Column 1. See Photo #10.										
301			Joint-Pourable Seal	2	30	m	30	0	0	0
(301) The joints are covered by the AC overlay and not visible for direct inspection.										
331			Railing-RC	2	80	m	40	20	20	0
	1080		Delamination/Spall/Patched Area	2	20		0	0	20	0
	1090		Exposed Rebar (PS Conc./RC)	2	20		0	20	0	0
(331) Several of the tubular steel stanchions on the right side sidewalk are missing anchor bolts. See Photo #4. A work recommendation to replace the bolts has been entered.										
(331-1080) The RC bridge rail on both sides exhibits spalling, cracking, and incipient spalling. See Photo#2.										
(331-1090) The RC bridge rail on both sides exhibits spalling with areas of exposed reinforcement. See Photos #1 and #3.										

WORK RECOMMENDATIONS

RecDate: 06/09/2014
Action : Deck-Resurface
Work By: MAINT. CONTRACT
Status : PROPOSED

EstCost: $52,400
StrTarget: 2 YEARS
DistTarget:
EA:

Remove and replace the AC overlay and waterproof membrane.

WORK RECOMMENDATIONS

RecDate: 06/09/2014 Action : Railing-Repair Work By: BRIDGE CREW Status : PROPOSED	EstCost: $2,600 StrTarget: 1 YEAR DistTarget: EA:	Replace missing anchor bolts on the right side sidewalk stanchions.
RecDate: 09/14/2010 Action : Sub-Scour Mitigate Work By: MAINT. CONTRACT Status : TEN YEAR PLAN	EstCost: $25,000 StrTarget: 2 YEARS DistTarget: EA: S1010	Repair the eroded bank at the upstream side of Abutment 5 (northern abutment) with Rock Slope Protection (RSP). Extend the RSP downstream under the bridge to the top of the footing of abutment 5 to protect it from undermining. The estimated cost is $25,000.
RecDate: 02/10/1984 Action : Railing-Upgrade Work By: STRAIN Status : TEN YEAR PLAN	EstCost: $160,720 StrTarget: 2 YEARS DistTarget: EA: S1010	F1-03 / F2-0 / F3-5 / Rail Type-C.WIN

Team Leader : Shawn Hart

Report Author : Shawn Hart

Inspected By : S.Hart/EC.Kaslan

9/23/14

Shawn Hart (Registered Civil Engineer) (Date)

STRUCTURE INVENTORY AND APPRAISAL REPORT

********** IDENTIFICATION **********

(1) STATE NAME- CALIFORNIA 069
(8) STRUCTURE NUMBER **19 0033**
(5) INVENTORY ROUTE(ON/UNDER)- ON 131000890
(2) HIGHWAY AGENCY DISTRICT 03
(3) COUNTY CODE 061 (4) PLACE CODE 00000
(6) FEATURE INTERSECTED- TRUCKEE RIVER
(7) FACILITY CARRIED- STATE ROUTE 89
(9) LOCATION- 03-PLA-089-8.48
(11) MILEPOINT/KILOMETERPOINT 8.48
(12) BASE HIGHWAY NETWORK- PART OF NET 1
(13) LRS INVENTORY ROUTE & SUBROUTE 000000008901
(16) LATITUDE 39 DEG 10 MIN 00.15 SEC
(17) LONGITUDE 120 DEG 08 MIN 39.15 SEC
(98) BORDER BRIDGE STATE CODE % SHARE %
(99) BORDER BRIDGE STRUCTURE NUMBER

******** STRUCTURE TYPE AND MATERIAL *********

(43) STRUCTURE TYPE MAIN:MATERIAL- CONCRETE
TYPE- TEE BEAM CODE 104
(44) STRUCTURE TYPE APPR:MATERIAL- OTHER/NA
TYPE- OTHER/NA CODE 000
(45) NUMBER OF SPANS IN MAIN UNIT 4
(46) NUMBER OF APPROACH SPANS 0
(107) DECK STRUCTURE TYPE- CIP CONCRETE CODE 1
(108) WEARING SURFACE / PROTECTIVE SYSTEM:
A) TYPE OF WEARING SURFACE- BITUMINOUS CODE 6
B) TYPE OF MEMBRANE- PREFORMED FABR CODE 2
C) TYPE OF DECK PROTECTION- NONE CODE 0

********** AGE AND SERVICE **********

(27) YEAR BUILT 1928
(106) YEAR RECONSTRUCTED 0000
(42) TYPE OF SERVICE: ON- HIGHWAY-PEDESTRIAN 5
UNDER- WATERWAY 5
(28) LANES:ON STRUCTURE 02 UNDER STRUCTURE 00
(29) AVERAGE DAILY TRAFFIC 11100
(30) YEAR OF ADT 2010 (109) TRUCK ADT 6 %
(19) BYPASS, DETOUR LENGTH 79 KM

********** GEOMETRIC DATA **********

(48) LENGTH OF MAXIMUM SPAN 9.1 M
(49) STRUCTURE LENGTH 37.2 M
(50) CURB OR SIDEWALK: LEFT 0.2 M RIGHT 1.5 M
(51) BRIDGE ROADWAY WIDTH CURB TO CURB 9.8 M
(52) DECK WIDTH OUT TO OUT 10.2 M
(32) APPROACH ROADWAY WIDTH (W/SHOULDERS) 9.8 M
(33) BRIDGE MEDIAN- NO MEDIAN 0
(34) SKEW 0 DEG (35) STRUCTURE FLARED NO
(10) INVENTORY ROUTE MIN VERT CLEAR 99.99 M
(47) INVENTORY ROUTE TOTAL HORIZ CLEAR 9.8 M
(53) MIN VERT CLEAR OVER BRIDGE RDWY 99.99 M
(54) MIN VERT UNDERCLEAR REF- NOT H/RR 0.00 M
(55) MIN LAT UNDERCLEAR RT REF- NOT H/RR 0.0 M
(56) MIN LAT UNDERCLEAR LT 0.0 M

********** NAVIGATION DATA **********

(38) NAVIGATION CONTROL- NO CONTROL CODE 0
(111) PIER PROTECTION- CODE
(39) NAVIGATION VERTICAL CLEARANCE 0.0 M
(116) VERT-LIFT BRIDGE NAV MIN VERT CLEAR M
(40) NAVIGATION HORIZONTAL CLEARANCE 0.0 M

****

SUFFICIENCY RATING = 79.7
STATUS
HEALTH INDEX = 96.8
PAINT CONDITION INDEX = N/A

********** CLASSIFICATION ********** CODE

(112) NBIS BRIDGE LENGTH- YES Y
(104) HIGHWAY SYSTEM- ROUTE ON NHS 1
(26) FUNCTIONAL CLASS- OTHER PRIN ART RURAL 02
(100) DEFENSE HIGHWAY- NOT STRAHNET 0
(101) PARALLEL STRUCTURE- NONE EXISTS N
(102) DIRECTION OF TRAFFIC- 2 WAY 2
(103) TEMPORARY STRUCTURE-
(105) FED.LANDS HWY- NOT APPLICABLE 0
(110) DESIGNATED NATIONAL NETWORK - NOT ON NET 0
(20) TOLL- ON FREE ROAD 3
(21) MAINTAIN- STATE HIGHWAY AGENCY 01
(22) OWNER- STATE HIGHWAY AGENCY 01
(37) HISTORICAL SIGNIFICANCE- NOT ELIGIBLE 5

********** CONDITION ********** CODE

(58) DECK 8
(59) SUPERSTRUCTURE 8
(60) SUBSTRUCTURE 7
(61) CHANNEL & CHANNEL PROTECTION 8
(62) CULVERTS N

********* LOAD RATING AND POSTING ********* CODE

(31) DESIGN LOAD- MS-18 OR HS-20 5
(63) OPERATING RATING METHOD- LOAD FACTOR 1
(64) OPERATING RATING- 63.5
(65) INVENTORY RATING METHOD- LOAD FACTOR 1
(66) INVENTORY RATING- 38.2
(70) BRIDGE POSTING- EQUAL TO OR ABOVE LEGAL LOADS 5
(41) STRUCTURE OPEN, POSTED OR CLOSED- A
DESCRIPTION- OPEN, NO RESTRICTION

********** APPRAISAL ********** CODE

(67) STRUCTURAL EVALUATION 7
(68) DECK GEOMETRY 4
(69) UNDERCLEARANCES, VERTICAL & HORIZONTAL N
(71) WATER ADEQUACY 8
(72) APPROACH ROADWAY ALIGNMENT 8
(36) TRAFFIC SAFETY FEATURES 0000
(113) SCOUR CRITICAL BRIDGES 7

********** PROPOSED IMPROVEMENTS **********

(75) TYPE OF WORK- MISC STRUCTURAL WORK CODE 38
(76) LENGTH OF STRUCTURE IMPROVEMENT 37.2 M
(94) BRIDGE IMPROVEMENT COST $400,000
(95) ROADWAY IMPROVEMENT COST $80,000
(96) TOTAL PROJECT COST $672,000
(97) YEAR OF IMPROVEMENT COST ESTIMATE 2010
(114) FUTURE ADT 12100
(115) YEAR OF FUTURE ADT 2034

********** INSPECTIONS **********

(90) INSPECTION DATE 06/14 (91) FREQUENCY 24 MO
(92) CRITICAL FEATURE INSPECTION: (93) CFI DATE
A) FRACTURE CRIT DETAIL- NO MO A)
B) UNDERWATER INSP- NO MO B)
C) OTHER SPECIAL INSP- NO MO C)

Photo No. 1
Spalled Rail Base With Exposed Reinforcement (typ)

Photo No. 1
Spalled Rail Base With Exposed Reinforcement (typ)

Photo No. 2
Ballusters With Incipient Spalling (typ)

Photo No. 2
Ballusters With Incipient Spalling (typ)

Photo No. 3
Spalled Rail With Exposed Reinforcement Near Abutment 1 (Left Side)

Photo No. 3
Spalled Rail With Exposed Reinforcement Near Abutment 1 (Left Side)

Photo No. 4
Railing Stanchion With Missing Bolts (typ)

Photo No. 4
Railing Stanchion With Missing Bolts (typ)

Photo No. 5
Transverse AC Cracks, Abutment 5 Joint

Photo No. 5
Transverse AC Cracks, Abutment 5 Joint

Photo No. 6
Transverse AC Cracks, Abutment 1 Joint

Photo No. 6
Transverse AC Cracks, Abutment 1 Joint

Photo No. 7
Failed AC Section with Patch, Span 3 Left Side

Photo No. 7
Failed AC Section with Patch, Span 3 Left Side

Photo No. 8
Bent 2 Cap: Patches, Map Cracking, Efflorescence and Staining

Photo No. 8
Bent 2 Cap: Patches, Map Cracking, Efflorescence and Staining

Photo No. 9
Bent 2 Cap Left Side Overhang: Incipient Spall

Photo No. 9
Bent 2 Cap Left Side Overhang: Incipient Spall

Photo No. 10
Bent 4 Cap Facing Span 3: Failed Patch Near Column 1.

Photo No. 10
Bent 4 Cap Facing Span 3: Failed Patch Near Column 1.

FRIENDS OF THE WEST SHORE
• Protecting Our Watersheds • Wildlife • Rural Quality of Life

Tahoe Regional Planning Agency
Attn: Mr. Brian Judge
PO Box 5310
Stateline, NV 89449

February 6, 2015

Tahoe Transportation District
Attn: Mr. Alfred Knotts
PO Box 499
Zephyr Cove, NV 89448

Subject: Request for Extension of Public Comment Period for DEIR/S/EA on State Route 89/Fanny Bridge Community Revitalization Project

Dear Mr. Judge and Mr. Knotts:

We recently received notice regarding the TTD's public workshop scheduled for February 26, 2015. According to the announcement, this workshop will provide the following opportunities for the public to:

- Offer input on bridge aesthetics for proposed new bridge and/or Fanny Bridge
- Discuss ideas for new sidewalks
- Get detailed information on roundabouts
- See aerial video of project area, still images, streetscaping ideas and example design photos

We appreciate the additional information and opportunity the TTD aims to provide for the public to participate, however, we feel such information should have been included in the draft EIR/S/EA to ensure the public ample time to consider and comment on the information, and have it addressed by the final EIR/S/EA. For example, videos, images, and example design photos, as well as detailed information on roundabouts, are important items for helping the public assess and comment on the scope of each alternative. As our comments will note, the draft DEIR/S/EA is currently deficient in its analysis of several impacts, including scenic and recreation.

We therefore request the deadline for comments on the draft EIR/S/EA be extended by at least 30 days (no earlier than March 6) in order to provide the public at least one week to review and assess the new information that will be provided at the Feb. 26th meeting and provide comments so they may be addressed in the final EIR/S/EA.

Thank you for your consideration. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President,
Friends of the West Shore

Jennifer Quashnick
Conservation Consultant
Friends of the West Shore