



Central Federal Lands Highway Division
Attn: Michael Davies
12300 West Dakota Avenue
Lakewood, CO 80228

November 24, 2015

Subject: S.R. 89/Fanny Bridge Community Revitalization Project, Lake Tahoe, CA

Dear Mr. Davies:

The Friends of the West Shore (FOWS) works toward the preservation, protection and conservation of the West Shore, our watersheds, wildlife, and rural quality of life, for today and future generations. We appreciate the DOT's attention to Lake Tahoe transportation issues. However, FOWS remains extremely concerned that the SR 89/Fanny Bridge Project (Fanny Bridge) will cause substantial and unnecessary environmental damage to the area, all while costing taxpayers over \$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 of Fanny Bridge (\$2 million).¹ We ask you to consider the following:

- There are no environmental benefits to the bypass (Alt. 1) versus widening Fanny Bridge (Alternatives 6/6a, or a reduced version of 6/6a²), and additional traffic impacts will result;³
- The congestion the Project originally aimed to solve occurs for just a few weeks in the summer and winter months. Further, recent improvements at Fanny Bridge have alleviated some of the congestion experienced years ago. This is a huge expenditure of public tax dollars on a project that will harm the environment to purportedly fix a short term, temporary problem that can be resolved through other less impactful options (for example, law enforcement officers have managed traffic during peak periods in the past);
- Throughout the United States, our roadway infrastructure needs repair, yet funding is sorely lacking. Public tax dollars should be spent on overdue repairs, not building new roads.⁴
- Unregulated pedestrian crossings in Tahoe City notably contribute to the congestion in the project area. The project – which originated as a means to reduce congestion and improve pedestrian safety – fails to address this key contributor to the congestion in the area.
- The proposed Village at Squaw Valley Specific Plan EIR concludes a significant and unavoidable impact to traffic on S.R. 28 through Tahoe City due to increases in traffic generated by Squaw's expansion.⁵ This will only exacerbate congestion in Tahoe City. Public tax dollars would be better spent resolving these conflicts before developments draw even more vehicles.
- Notably, **72% of the comments submitted by residents and business owners do not support Alternative 1.**⁶

¹ <http://www.placer.ca.gov/upload/bos/cob/documents/sumarchv/2015/150519A/07a.pdf>; p. 335

² FOWS supports a reduced, narrower version of Alternatives 6/6a.

³ "By including required mitigation measures and design features into a proposed project, the Final EA/EIR/EIS concludes that, with the exception of traffic impacts, no unmitigated significant environmental impacts were identified in any of the analyzed alternatives. All of the alternatives analyzed will create traffic impacts, though the type and severity of those impacts differs between the alternatives." (Staff report, p. 136)

⁴ "Our infrastructure is on life support..." (i.e. view "60 minutes" TV Show, CBS, aired 5/17/2015).

⁵ http://www.placer.ca.gov/~media/cdr/ECS/EIR/VSVSP/DEIR/9_VSVSP_DEIR_TransandCirc.pdf

⁶ 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

It is our understanding that the DOT has indicated that Caltrans requires the traffic flow to be modeled at full capacity as if these conditions were daily (Pers. Comm., Jim Sajdak). Not only are the most congested conditions far from daily (peak traffic occurs generally a few weekends per year), but it is also well documented by California that project impacts should not be judged by LOS impacts. In fact, in 2013 California's Governor Brown signed Senate Bill 743, which requires the Governor's Office of Planning and Research (OPR) to "provide an alternative to level of service for evaluating transportation impacts." California's OPR notes that the "mitigation for increased delay often involves increased capacity, which may increase auto use and emissions and discourage alternative forms of transportation."⁷ Instead, OPR suggests that measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." Further, in the August 2015 "*Proposed Updates to the CEQA Guidelines*," OPR proposes to revise the questions related to transportation impacts, which currently refer to "level of service," to focus instead on a project's vehicle miles traveled.⁸

In summary, California has clearly recognized that construction of transportation projects for the purposes of presumably improving peak congestion⁹ only leads to more transportation impacts in the long run. As a result, the OPR proposes changes to how project impacts are analyzed. This process began in 2013, almost two years before the Fanny Bridge draft EIR was released. It would be unfortunate to expend additional public resources on an unnecessary project that aims to meet a transportation goal the state has recognized as causing *additional* transportation problems.

Placer County has also stated similar concerns with planning for peak periods. The following information is included in two recent Placer County draft Environmental Impact Reports:¹⁰

"This DEIR analyzes project impacts during both summer and winter conditions. Several issues are considered, and one is a focus on congestion. As a general note, congestion addresses traveler convenience; how long should a motorist sit in their automobile when traveling from one point to another. When traffic volumes are large relative to roadway's capacity, congestion occurs, slowing traffic and requiring greater travel time. This is a social/economic issue, and communities must balance between many factors when addressing congestion, including vehicle speeds, the cost to build and maintain wider roads, environmental impacts from road improvements, etc. In striking a balance, agencies tend to focus on 'typical' traffic congestion issues, such as considering frequent conditions (e.g., peak hour trips, typical peak periods) when determining existing conditions and project impacts. Agencies typically shy away from evaluating impacts

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.

⁷ Updating Transportation Impacts Analysis in the CEQA Guidelines. *Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743* (Steinberg, 2013). Governor's Office of Planning and Research. 8/6/2014.

⁸

http://opr.ca.gov/docs/Preliminary_Discussion_Draft_Package_of_Amendments_to_the_CEQA_Guidelines_Aug_11_2015.pdf

⁹ As noted in our comments on the EIR, the Fanny Bridge project does not address one of the key causes of congestion in the area – activities in Tahoe City.

¹⁰ Village at Squaw Valley Specific Plan DEIR at:

<http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/villageatsquawvalley/draft%20eir> and Martis Valley West Parcel Specific Plan DEIR at:

http://www.placer.ca.gov/~media/cdr/ecs/eir/martisvalleywestparcel/deiroct2015/10%20transportation%20deir_10,-d-,19,-d-,15.pdf?la=en; Quote is from VSVSP DEIR however the MVWSP includes the same disclaimer.

based on occasional conditions so that impacts, and measures to mitigate impacts, don't result in over-building roads—along with the resulting economic and environmental consequences—to address those infrequent conditions. For example, when commercial/retail facilities are evaluated, the busiest shopping days of the year (day after Thanksgiving, day before and after Christmas) are not studied so that roads are not designed for these several days, while being substantially underutilized the remainder of the year. This issue is unique to traffic, because of the social and economic nature of the impact.” [Emphasis added].

Placer County’s SR 89/Fanny Bridge EIR/S – notably completed by the same consulting firm during the same year as the two DEIRs which include this discussion of peak period – inexplicably includes no such disclaimer (*see Section 4-15¹¹*). In fact, the transportation impacts are based on the *peak* summer conditions.

In conclusion, we recommend the DOT consider a phased approach. This would involve repairing Fanny Bridge, gathering current and appropriate information regarding pedestrian activity in the area, and testing alternative options (e.g. controlling pedestrian traffic in Tahoe City) to determine whether other measures will help alleviate traffic during the busiest peak periods. We believe this would be a more fiscally responsible and environmentally prudent approach to addressing peak period issues in this area. Other conservation organizations (i.e. the Tahoe Area Sierra Club) and private citizens share the same opinion. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.¹²

Sincerely,



Susan Gearhart,
President



Jennifer Quashnick,
Conservation Consultant

Cc: Matt Ambroziak, Central Federal Lands Highway Division

¹¹ Section 4-15, SR 89/Fanny Bridge Project DEIR/S; http://www.trpa.org/wp-content/uploads/Draft_SR89-FannyBridgeEIR-EIS-EA_12192014.pdf

¹² FOWS’ comments on the draft and final EIRs can be viewed at: <http://friendswestshore.org/wordpress/wp-content/uploads/2015/05/FOWS-comments-on-FannyB-FEIR.S-for-TRPA-GB-5.23.2015.pdf> and <http://friendswestshore.org/wordpress/wp-content/uploads/2015/05/Attachments-5.23.2015-FOWS-Comments-to-TRPA-GB-re-Fanny-Bridge.pdf>

Executive Summary

On September 27, 2013, Governor Brown signed [Senate Bill 743](#) (Steinberg, 2013). Among other things, SB 743 creates a process to change the way we analyze transportation impacts under the California Environmental Quality Act (Public Resources Code section 21000 and following) (CEQA). Currently, environmental review of transportation impacts focuses on the delay that vehicles experience at intersections and on roadway segments. That delay is often measured using a metric known as “level of service,” or LOS. Mitigation for increased delay often involves increasing capacity (i.e. the width of a roadway or size of an intersection), which may increase auto use and emissions and discourage alternative forms of transportation. Under SB 743, the focus of transportation analysis will shift from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses.

SB 743 requires the Governor’s Office of Planning and Research (OPR) to amend the CEQA Guidelines (Title 14 of the California Code of Regulations sections and following) to provide an alternative to level of service for evaluating transportation impacts. The alternative criteria must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (New Public Resources Code Section 21099(b)(1).) Measurements of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.” (*Ibid.*)

This document contains a ***preliminary discussion draft*** of changes to the CEQA Guidelines implementing SB 743. In developing this preliminary discussion draft, OPR consulted with a wide variety of potentially affected stakeholders, including local governments, metropolitan planning organizations, state agencies, developers, transportation planners and engineers, environmental organizations, transportation advocates, academics, and others. OPR released its [preliminary evaluation](#) of different alternatives for public review and comment in December 2013. Having considered all [comments](#) that it received, and conducted additional research and consultation, OPR now seeks public review of this preliminary discussion draft.

This document contains background information, a narrative explanation of the proposed changes, text of the proposed changes, and appendices containing more detailed background information.