



Tahoe Regional Planning Agency  
Attn: Devin Middlebrook  
PO Box 5310  
Stateline, NV 89449

August 18, 2020

**Subject: Draft State Route 89 Corridor Management Plan**

Dear Mr. Middlebrook:

The Friends of the West Shore (FOWS) appreciates this opportunity to provide comments on the Draft State Route 89 Corridor Management Plan (SR 89 CMP). FOWS mission is to work toward the preservation, protection, and conservation of the West Shore, our watersheds, wildlife, and rural quality of life, for today and future generations. FOWS represents community interests from Emerald Bay to south of Tahoe City.

FOWS believes it is imperative to address the extensive traffic, public safety, and environmental impacts that have continued to increase in recent years, and to protect the unique beauty and recreational opportunities along the corridor. In addition, FOWS has also long been concerned about the impacts of more vehicles traveling along the West Shore to visit Emerald Bay and is pleased to see measures in the SR 89 CMP that aim to reduce the number of vehicles driving to Emerald Bay, especially during peak periods.

FOWS hopes the attached comments will assist the TRPA and agency partners in preparation of the final SR 89 CMP. Please feel free to contact Jennifer Quashnick at [jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net) if you have any questions.

Sincerely,

Judith Tornese,  
President

Jennifer Quashnick,  
Conservation Consultant

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## Transit/Shuttle Services and Parking:

### *1. Transit and Shuttle Services*

#### **Shuttle service at Sugar Pine Pt. SP (SPP):**

The plan proposes to use SPP as a park and ride location for a shuttle to Emerald Bay. FOWS strongly supports the implementation of a shuttle system to get people to Emerald Bay without their vehicles. However, as we have seen happen this year, demand has increased and drivers are often not adhering to parking restrictions. We encourage the final plan to include more details regarding the proposed parking (i.e. number of spots and locations) and enforcement.

The plan also proposes SPP as a location for a water taxi service that would take people to Emerald Bay. We believe it is best that parking for a water taxi and the shuttle system be in the same location. However, parking management and vehicle and pedestrian circulation patterns will need to be carefully examined.

While this plan stops at the Placer County line in Tahoma, we strongly recommend a shuttle be provided from Tahoe City in the future to further reduce the need for visitors to drive along the West Shore.

#### **Transit Frequency:**

The CMP proposes a 15 minute shuttle from SPP and 30 minute shuttle from South Shore in Phase 1 and a 30 minute shuttle from SPP and 15 minute shuttle from South Shore in Phase 2. It is unclear why frequency would decrease from SPP. We recommend the frequency be maintained in Phase 2.

#### **Shuttles:**

We encourage the use of electric-powered shuttles to reduce the pollution that would be associated with their use.

### *2. Water Taxis:*

The expansion of water taxi service should be moved to Phase 3. It may turn out that the shuttle service combined with the other strategies alleviates traffic and parking issues. We recommend

resources first be prioritized toward implementation of more frequent and convenient on-road transit service. Water taxi service will be more expensive and slower than shuttles.

We also encourage the project implementers to favor private vendors for provision of the water taxi service. In addition, water taxis should be fueled by clean energy so they do not contribute air or water pollution to the lake.

### **3. Parking:**

#### **Paid Parking:**

While it is desirable to keep costs down, unfortunately the significant over-use of the SR 89 Corridor in Emerald Bay (and Camp Richardson/Pope Beach areas) require significant measures to reduce safety and environmental impacts. We support the implementation of parking fees in concert with providing adequate alternative access options (e.g. the shuttle, increased pedestrian/bike path routes, etc.), including fees that increase during peak periods. Funding the improvements in the CMP is necessary, therefore revenue generation will be key. Parking fees would generate funds to help implement the CMP as well as disincentivize the use of private automobiles and visits during peak periods. However, we would recommend year-round, discounted passes for parking be made available for locals and underserved populations.

The CMP appears to include only a “framework” for the fees in Phase 1 and proposes fees in Phase 2. We recommend fee collection be started as soon as possible, even if it does not incorporate all of the proposed elements in Phase 1.

In addition, fines for illegal parking need to be significantly increased. As noted in a recent article<sup>1</sup>, many visitors consider current fines as ‘just the price of the visit’ and are not discouraged from illegal parking. Further, while we understand there are logistical issues which make towing illegally-parked vehicles difficult (including the congestion that is caused by waiting for the tow truck to attach and haul away the vehicle), we hope that with reductions in traffic and parking along the highway, tow truck access to tow those who still park illegally will be made easier.

#### **Bayview parking:**

We support the prevention of on-highway parking and understand this may involve removing some camping spots from the Bayview Campground for use as parking. The CMP should include more information about how the parking will be distributed between those parking to use the shuttle to Emerald Bay, visit Inspiration Point, hike to Cascade Lake, or hike into Desolation Wilderness (which would include both day users and overnight users). We also support keeping the parking area (partially or fully) open during the winter months for access, so long as there are adequate facilities to support their use (e.g. trash removal, restrooms, etc.).

The USFS has stated that any removed sites would be relocated somewhere else in the Basin. We recommend the USFS examine locations along the West Shore to keep the spots in the vicinity and to locate them in areas that are not already overly-congested.

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<sup>1</sup> <http://southtahoenow.com/story/08/13/2020/how-much-are-you-willing-pay-parking-fines-around-lake-tahoe>

### **Reservation system for transit and parking:**

We strongly support the implementation of a reservation system for parking and transit, modeled after the Muir Woods system. We also support allocating a pool of reservations for locals and underserved populations.

### **Parking in Meeks Bay and SPP:**

The CMP proposes that adaptive management may be used in the future to address roadside parking in Meeks Bay and at SPP. However, parking in these areas, especially along the highway in Meeks Bay, is already problematic. The increased visitation this year has only made this worse. It is unclear to what extent, if any, the Meeks Bay Restoration Project (Restoration Project) will address parking along the sides of the highway through Meeks Bay. If along-highway parking will not be addressed as part of the Restoration Project, this should be incorporated into the plan and addressed beginning with Phase 1 in coordination with the Restoration Project.

## **Winter access:**

### **Highland Drive:**

The CMP proposes improvements to parking for winter access off Highland Drive. While we support improvements to retain existing access and to move it off of the street (as is proposed by the Tahoe Backcountry Alliance<sup>2</sup>), modifications should not result in significant increases of vehicles traveling into the neighborhood for access. We recommend that the project simply remove parking from on-street to off-street with adequate snow removal and strict enforcement of no-parking policies.

### **Emerald Bay:**

The CMP includes an evaluation of the need for a small parking area (15 spaces) by North Emerald Bay gates for off-season/winter access<sup>3</sup> in Phase 3. However, as the CMP already notes, the need for winter access is already well-established. The CMP should be revised to analyze this option in Phase 1.

## **Proposed “Multi-Use Lake Trail”:**

The plan also includes the “Multi-Use Lake Trail”. This appears to be the mountain bike-focused trail that is supposed to be analyzed as part of the USFS environmental analysis of allowing electric bikes (“E-bikes”) on a portion of trails in the Lake Tahoe Basin<sup>4</sup> (which is still forthcoming as far as we know). This new trail has not been vetted among the public yet and we are concerned that including it “as is” in the CMP will essentially result in future approval by agencies. Typically, once a concept is included in an adopted plan, future proposed projects simply refer back to the plan as ‘support’ for the proposal. We believe this trail requires extensive public outreach, especially to residents and homeowners in the area; in addition, that the trail may also propose to allow E-bikes, which is a

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<sup>2</sup> <http://tahoebackcountryalliance.org/tba-wp/current-projects/>

<sup>3</sup> P. 90

<sup>4</sup> <https://www.fs.usda.gov/project/?project=54566>

controversial issue, amplifies the importance of vetting this with the public prior to approving it in the plan.

Further, such a trail would not be expected to have much, if any, impact on reducing vehicular traffic to Emerald Bay, which offers no opportunities for mountain bike use<sup>5</sup> due to land designations and ownership. While there may be some hikers who might use the new trail to access Emerald Bay, the proposed project is geared primarily toward mountain bike users and associated trail design; it is reasonable to assume that it will be used primarily by mountain bikers. Therefore, we request this trail be removed from the CMP and considered separately in the upcoming USFS environmental review.

## Revenue:

The CMP discusses the interest in ensuring that the revenue generated within the corridor can be spent within the corridor, however current management structures do not allow for that approach.<sup>6</sup> The document also states that the CMP “*identifies methods by which the approach might be implemented.*” It appears the primary approach is through development of a Corridor Management Team that would address such procedural issues.<sup>7</sup> While we understand that assembling such a team and determining work programs takes time, we also encourage the Team to prioritize working on solutions to resolve the issue of keeping locally-generated revenue for use locally. The broad selection of measures in the CMP will not go far unless they are funded in both the short- and long-term.

## Capacity:

We believe that in order to adopt a plan which reduces traffic, improves public safety, reduces environmental impacts, and supports positive recreational experiences, the issue of capacity of the areas cannot be ignored. Even if every visitor used a shuttle, it would still be important to consider the capacity of the hiking trails, pedestrian paths, beaches, etc., to prevent the consequences of over-use. However, the CMP, which calls attention to providing access to a “sustainable number of visitors,”<sup>8</sup> includes no such capacity analysis; instead, there is a reference to a “Corridorwide capacity study”<sup>9</sup> as a consideration for the future Corridor Management Team. We believe capacity should be evaluated *prior to* final adoption of a Corridor Plan. However, in order not to slow the momentum to begin addressing issues now, we recommend this study be included in Phase 1 and adjustments made based on the results. For example, the capacity study may indicate a maximum number of users per day for the hike to Emerald Lake that the environment can sustain before harm from over-use occurs, and/or a maximum level of visitation that can be reached before user experiences significantly decrease. Such capacities could then be addressed through the parking and shuttle reservation systems.

The CMP references a paper by David Cole in 2019 that states that literature research “*shows visitor management techniques are more effective than strictly limiting use in order to limit impact on*

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<sup>5</sup> <https://www.mtbproject.com/directory/8007254/emerald-bay-and-dl-bliss-state-parks>

<sup>6</sup> P. 11

<sup>7</sup> P. 120

<sup>8</sup> P. 48

<sup>9</sup> P. 120

*resources. The connection between use levels and the impacts to both the size and/or intensity of disturbance may not be a one to one relationship.”*<sup>10</sup> We do not dispute this, however these results do not mean that limiting visitor use in order to limit impacts on resources should not be part of an overall management system.

### Other comments:

- We support the inclusion of undergrounding powerlines in the plan.
- The CMP includes several separate-grade crossings along the west shore. These will require snow removal to provide adequate alternative access in the winter months.
- Meetings of the Future Management Team<sup>11</sup> discussed should be fully open to the public.
- If the highway were modified around the hairpin turns south of Emerald Bay to accommodate larger shuttles, would this open the highway up to use by larger semis and other larger vehicles, which could create other problems? What impact is there to the number of passengers that could ride a shuttle under the current roadway configuration versus the proposed modification? In other words, how significant would the increased capacity for shuttle riders be if the roadway were modified? We also recommend such a significant modification be considered only after a sufficient capacity analysis has been completed for Emerald Bay and if the analysis finds that more visitors can be accommodated.
- In Table 3 on p. 111, all of the sums are off by a factor of 2.

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<sup>10</sup> P. 118

<sup>11</sup> P. 120