

# North Tahoe Citizen Action Alliance

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North Tahoe Citizen Action Alliance (NTCAA) was organized to represent the local resident, business owner and property owner in a citizen's voice for our North Tahoe Community. Having a significant number of Tahoe Vista community members who are either NTCAA members or those who have been contacted, NTCAA finds it essential to comment on the Tahoe Vista Partners, LLC Affordable Housing and Interval Ownership Development Draft EA/EIR.

1. Under the Public Service section, analysis of the Fire Department's concerns is incomplete. The North Tahoe Fire Protection District requires secondary access for a proposed development of this scale and configuration. In a letter dated July 6, 2007 to Mr. Steve Buelna of the Placer County Planning Department, Fire Chief Duane Whitelaw states in Section 8, "*A secondary access road, either a looped road, or an emergency access road to Toyon Road shall be provided.*" This has not been implemented in the Draft EA/EIR.
2. The Tahoe Vista Community Plan addresses the proposed development site by the statement encouraging expansion of the campground. The property owner cannot economically justify this course of development as evidenced by the proposed project. However, replacement of the campground on NTPUD property at Dollar Hill and the North Tahoe Regional Park has not been pursued or assured. The mitigation fee of \$500,000 imposes financial demands on the developer to maximize density and coverage on the site. The current proposed project was never envisioned as possible during the Tahoe Vista Community Plan formulation during the 1990's.
3. Under the existing governing Community Plan residential timeshare is not an allowed use but is a special use, requiring a special use permit. The DEIR uses language such as "con-

4. sistent with” Community Plan, which the proposed development is not. This type and scale of project was never conceived or discussed in the Community plan process.
5. There is insufficient snow storage on site. The current winter storms have demonstrated the lack of available local sites for excess snow storage. The proposed on site capacity is certainly not based on a normal winter snowfall. The snow would have to be hauled off the site which imposes burdens on the surrounding area to absorb this impact. Snow is often hauled long distances and/or dumped in “any expedient” location. The DEIR does not identify these impacts.
6. The Traffic section calculates the incremental increase in VTE (299) during the summer use of the campground facilities, fully occupied about three months of the year. However, the proposed development as residential tourist accommodation will enable year round use for an additional nine months of 522 VTE’s. The EIR only refers to summer (offset by campground VTE’s) and winter traffic. This technique gives a false impression of the year round impact which would be the 522 VTE for about nine months.
7. Grandfathering in a 62% land use coverage, which was based on the campground use described in Item 5 above, does not reflect the immediate impacts on the environment and infrastructure that the proposed project will incur. The use is changing significantly and is very close to single family residences. The housing density should be reduced to approximately 30%. Typical housing density for this area of Tahoe Vista is five/acre. This project is ten/acre and is not consistent with the character of the community as required in the presently governing community plan.
8. The TRPA is currently developing a Regional Plan for the Lake Tahoe Basin. It will not be approved until 2009. Since the Tahoe Vista Community Plan will then be developed within the scope of the Regional Plan, all land use changes should be postponed until that time, including this development.
9. Under Vegetation and Noise sections there is no identified impact of increased noise levels on nearby residential neighborhoods from highway 28 due to the removal of trees.
10. The proposed removal of 85% of the existing trees, coupled with the 62% land coverage, will significantly degrade the environment by reducing air quality, reducing rainwater absorption, increasing surface runoff into Lake Tahoe, and impairing the visual beauty of the property, not in keeping with the character of Lake Tahoe. How can any amount of revegetation replace this loss?

11. The transfer of TAU's should be analyzed further. If the TAU's are from motel rooms of 300 to 500 sq. ft. and are being used to build the proposed 1900 to 3000 sqft units, there are growth impacts that are not identified.
12. The Cumulative Impact section is inadequate. The payment of Air Quality Mitigation fees to TRPA and Traffic mitigation fees to Placer County does not address the accumulation of physical vehicles on the roadways or increased air pollution. Regional programs to encourage mass transit displace very few of the VTE's generated by projects targeting the demographic of the proposed project. Based on the logic of traffic impacts in the DEIR, any cumulative analysis could conclude "less than significant impact" even though several thousand additional vehicles occupy existing roadways. The methodology is inadequate to assess true cumulative impacts because it still looks at individual projects first making a judgment of their impacts. Then that judgment of level of significance is applied in relation to the general area. Traffic generated by all projects needs to be added together first to produce a physical incremental vehicle count. Only then can the true impact be judged as to its significance.
13. The currently proposed Community Enhancement Projects in Kings Beach will also add to traffic and infrastructure demands which must also be included for a comprehensive cumulative impact.
14. There are several major developments within one-square mile of Tahoe Vista: 1) Tahoe Vista Partners, LLC Affordable Housing and Interval Ownership Development, 2) North Tahoe Marina expansion (more than doubling in size), 3) Tahoe Sands Time Share expansion (doubling in size), 4) the adjoining Vista Village Affordable Housing Development, last proposed at 72 rental apartments, and 5) the Tahoe Vista Recreation Area parking lot. In addition, there are several smaller projects along Route 28, and the proposed expansion of the North Tahoe Regional Park. These will effectively double the population in that area.
15. The selection of Alternatives is biased in favor of full development of the parcel and is therefore inadequate. Alternative B reduces the number of units but increases the interior space of the units to an admitted difference of only 600 sq.ft. Therefore, there really is no alternative presented that reduces impacts significantly from Alternative A.

For the above reasons, the North Tahoe Citizen Action Alliance believes that the Tahoe Vista Partners, LLC Affordable Housing and Interval Ownership Development Draft EA/EIR is substantially inadequate in current facts, and the scope and depth of impacts on the Tahoe Vista and

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surrounding community. Action must be taken to mitigate these adverse impacts in a physical, not financial, way.

Sincerely,  
NORTH TAHOE CITIZEN ACTION ALLIANCE

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